

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AGINCOURT GAMING, LLC,)	
)	
Plaintiff,)	
)	Civil Action No. _____
v.)	
)	JURY TRIAL DEMANDED
ELECTRONIC ARTS INC.)	
)	
Defendants.)	
_____)	

COMPLAINT

For its Complaint, Plaintiff Agincourt Gaming, LLC ("Agincourt Gaming"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Agincourt Gaming is a Delaware limited liability company with a place of business located in Plano, Texas.
2. Defendant Electronic Arts Inc. is a Delaware corporation with, upon information and belief, a place of business located in Redwood City, California.

JURISDICTION AND VENUE

3. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*
4. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.
5. Venue is proper in this district.

THE PATENTS-IN-SUIT

6. On October 23, 2001, United States Patent No. 6,306,035 (the '035 patent") was duly and legally issued for an invention entitled "Graphical User Interface For Providing Gaming And Prize Redemption Capabilities." A true and correct copy of the '035 patent is attached as

Exhibit A.

7. On June 3, 2013, United States Patent No. 8,454,432 (the "'432 patent"), entitled "Method for Providing Network Gaming System," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '432 patent is attached hereto as Exhibit B.

8. The '035 patent and the '432 patent issued from a series of applications extending back to November 14, 1996.

9. Agincourt Gaming was assigned the '035 patent and the '432 patent, and continues to hold all rights and interest in the patents.

10. Defendant designs, makes, markets, uses, offers for sale, and/or sells the following products that infringe the '035 patent: Origin.

11. Defendant designs, makes, markets, uses, offers for sale, and/or sells the following products that infringe the '432 patent: Origin-enabled games, including, but not limited to, Mass Effect 3 and FIFA 15.

12. To redress Defendant's infringement of the '035 patent and the '432 patent, Agincourt Gaming seeks actual damages.

FACTUAL BACKGROUND

13. Agincourt Gaming was formed in April 2011. Agincourt Gaming provided online social network games. Its business plan focused on developing its own online social network games and then launching the games for play online.

14. In 2013, Agincourt Gaming launched its online social network game, Battle Conquest. Battle Conquest incorporates strategy, simulation, and role-play elements in an online platform that utilizes social interaction to enhance the gaming experience. As players interact with the game, they have opportunities to make in-game purchases of virtual goods and other

game-related items. To date, Battle Conquest has been played over one million times. In addition.

15. Agincourt Gaming's patents-in-suit, which claim priority to 1996, were both far ahead of their time in anticipating the development of credits-based online gaming. Long before the explosion of online games, Agincourt Gaming's patents-in-suit recognized that allowing online gamers to earn and redeem prizes – including, in particular, game enhancements – based on the outcome of game play would be desirable to players but difficult for game providers to effectively maintain and display.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 6,306,035

16. Agincourt Gaming repeats and realleges the allegations of paragraphs 1 through 15 as if fully set forth herein.

17. Defendant has been and still is infringing the '035 patent, literally or under the doctrine of equivalents, by making, using, importing, offering to sell, and/or selling certain software products, including, but not limited to the products identified in paragraph 10 above.

18. As a direct and proximate result of Defendant's acts of infringement, Agincourt Gaming has been, is being, and will be damaged. Defendant's infringement of Agincourt Gaming's exclusive rights under the '035 patent will continue to damage Agincourt Gaming.

19. Agincourt Gaming also is entitled to recover from Defendant the damages sustained by Agincourt Gaming as a result of Defendant's wrongful acts in an amount subject to proof at trial.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 8,454,432

20. Agincourt Gaming repeats and realleges the allegations of paragraphs 1 through 19 as if fully set forth herein.

21. Defendant has been and still is infringing the '432 patent, literally or under the doctrine of equivalents, by making, using, importing, offering to sell, and/or selling certain software products, including, but not limited to the products identified in paragraph 11 above.

22. As a direct and proximate result of Defendant's acts of infringement, Agincourt Gaming has been, is being, and will be damaged. Defendant's infringement of Agincourt Gaming's exclusive rights under the '432 patent will continue to damage Agincourt Gaming.

23. Agincourt Gaming also is entitled to recover from Defendant the damages sustained by Agincourt Gaming as a result of Defendant's wrongful acts in an amount subject to proof at trial.

JURY DEMAND

Agincourt Gaming hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

Agincourt Gaming respectfully requests entry of judgment in its favor and against Defendant as follows:

A. Declaring that Defendant has infringed and continues to infringe the '035 and '432 patents;

B. Awarding actual damages arising out of Defendant's infringement of the '035 and '432 patents, together with prejudgment and post-judgment interest, in an amount according to proof and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C. Awarding attorney's fees pursuant to 35 U.S.C. § 285 or as otherwise permitted by law; and

D. Awarding such other costs and further relief as the Court may deem just and proper.

Dated: May 1, 2015

STAMOULIS & WEINBLATT LLC

/s/ Richard C. Weinblatt

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