

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

EBUDDY TECHNOLOGIES B.V.,	§	
	§	
Plaintiff,	§	
	§	C.A. No.
v.	§	
	§	
LINKEDIN CORPORATION	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, eBuddy Technologies B.V. (hereinafter, “EBT” or “Plaintiff”), by and through its undersigned counsel, files this Original Complaint against Defendant LinkedIn Corporation (hereinafter, “LinkedIn” or “Defendant”), as follows:

NATURE OF THE ACTION

1. This is a patent infringement action to stop Defendant’s infringement of United States Patent Nos. 8,510,395 (the “395 Patent”)(attached as Exhibit 1), 9,584,453 (the “453 Patent”)(attached as Exhibit 2), 8,230,135 (the “135 Patent”)(attached as Exhibit 3) and 8,402,179 (the “179 Patent”)(attached as Exhibit 4) (collectively, the “Patents-in-Suit”).

PARTIES

2. Plaintiff eBuddy Technologies B.V. is a private limited liability company incorporated under the laws of the Netherlands.

3. Upon information and belief, Defendant LinkedIn is a corporation organized and existing under the laws of the State of Delaware, with a place of business at 2029 Stierlin Court, Mountain View, California 94043, and can be served through its registered agent, Corporation Service Company, 251 Little Falls Drive, Wilmington, Delaware 19808.

JURISDICTION AND VENUE

4. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1 et seq., including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This Court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over LinkedIn, including because LinkedIn is a Delaware corporation; LinkedIn has minimum contacts within the State of Delaware; LinkedIn has purposefully availed itself of the privileges of conducting business in the State of Delaware; LinkedIn regularly conducts business within the State of Delaware; and Plaintiff's cause of action arises directly from LinkedIn's business contacts and other activities in the State of Delaware, including at least by virtue of LinkedIn's infringing methods, systems, computer-readable media, and products, which have been, and are currently, at least practiced, made, and/or used in the State of Delaware. Defendant is subject to this Court's specific and general personal jurisdiction, pursuant to Constitutional Due Process and the Delaware Long Arm Statute. Defendant is subject to this Court's general personal jurisdiction due at least to its continuous and systematic business contacts in Delaware, including related to operations conducted in Delaware and the infringements alleged herein. Further, on information and belief, LinkedIn is subject to this Court's specific jurisdiction, including because LinkedIn has committed patent infringement in the State of Delaware, including as detailed herein. In addition, LinkedIn induces infringement of the Patents-in-Suit by customers and/or infringing users located in Delaware. Further, on information and belief, LinkedIn regularly conducts and/or solicits business, engages in other persistent courses of conduct, and/or derives substantial revenue from goods and services provided to persons and/or entities in Delaware.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400(b), including because LinkedIn resides in the State of Delaware at least by virtue of the fact that it is incorporated in this state and at least some of the direct and/or indirect infringement of the Patents-in-Suit occurs in this District.

THE PATENTS-IN-SUIT

7. EBT is the owner of all right, title, and interest in the Patents-in-Suit, including the right to sue for past, present, and future infringement thereof and to collect damages for any such past, present, or future infringement. The inventions disclosed and claimed in the '395 and '453 Patents comprising, *inter alia*, contact aggregation between different messaging services, provide numerous benefits over any prior systems or methods. The inventions disclosed and claimed in the '135 and '179 Patents comprising, *inter alia*, event notification, provide numerous benefits over any prior systems, methods, or non-transitory computer-readable media.

The '395 and '453 Patents

8. The matters described and claimed by the '395 Patent generally include, *inter alia*, systems comprising a network login engine; a network contacts database embodied in one or more non-transitory computer readable mediums; a web server coupled to the network contacts database; a contact aggregation engine coupled to the network login engine and the network contacts database; wherein, in operation, the contact aggregation engine: controls the network login engine to login or facilitate login to a first network associated with a first messaging service provider and a second network associated with a second messaging service provider, updates the networks contacts database with contact information obtained from the first messaging service provider and the second messaging service provider, maintains an aggregated contact list that comprises a first contact list associated with the contact information from the first messaging service provider and

a second contact list associated with the contact information from the second messaging service provider, stores the aggregated contact list in a non-transitory computer readable medium at the web server, and provides the aggregated contact list to a display device.

9. The matters described and claimed by the '395 Patent also generally include, *inter alia*, methods comprising joining a high level network; joining a first low level network associated with a first messaging service provider and a second low level network associated with a second messaging service provider; obtaining a first contact list associated with the first messaging service provider; obtaining a second contact list associated with the second messaging service provider; maintaining an aggregated contact that comprises the first contact list and the second contact list; logging into the high level network; displaying the aggregated contact list.

10. The asserted claims of the '395 Patent, when viewed as a whole, including as an ordered combination, are not merely the recitation of well-understood, routine, or conventional technologies or components. The claimed inventions were not well-known, routine, or conventional at the time of the invention, including with regard to message services, including web-based messaging services, over ten years ago, and represent specific improvements over the prior art systems and methods.

11. The matters described by the '453 Patent generally include, *inter alia*, systems for contact list aggregation across a plurality of different networks comprising a network interface; a network login engine coupled to the network interface; a network contacts database embodied in one or more non-transitory computer-readable mediums; a server coupled to the network contacts database; a contact aggregation engine coupled to the network login engine and the network contacts database; wherein, in operation, the contact aggregation engine controls the network login engine to login or facilitate login to a plurality of low level networks associated with a plurality of

messaging services through a high level network using the network interface to access contact information from the plurality of messaging services, updates the networks contacts database based on the contact information associated with the plurality of low level networks to create an aggregated contact list, stores the aggregated contact list in a non-transitory computer-readable medium at the server, and provides the aggregated contact list including the contact information to a display device.

12. The matters described by the '453 Patent also generally include, *inter alia*, methods for contact list aggregation across a plurality of different networks comprising joining a high level network; joining a plurality of low level networks associated with a plurality of messaging services through the high level network; obtaining a first contact list associated with the plurality of low level networks; maintaining a second contact list associated with the high level network; maintaining a contact list associated with the plurality of low level networks for the plurality of messaging services; logging into the high level network; displaying contacts from the plurality of low level networks and the high level network in an aggregated contact list, the contacts retrieved by logging into the high level network.

13. The matters described by the '453 Patent also generally include, *inter alia*, non-transitory computer readable medium comprising executable instructions, the instructions being executable by a processor to perform a method for contact list aggregation across a plurality of different networks, the method comprising: joining a high level network; joining a plurality of low level networks associated with a plurality of messaging services through the high level network; obtaining a first contact list associated with the plurality of low level networks; maintaining a second contact list associated with the high level network; maintaining a contact list associated with the plurality of low level networks for the plurality of messaging services; logging into the

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