

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.

Intellectual Ventures I LLC and
Intellectual Ventures II LLC,

Plaintiffs,

v.

Motorola Mobility LLC,

Defendant.

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC hereby sue
Motorola Mobility LLC (“Motorola Mobility”) and allege as follows:

THE PARTIES

1. Intellectual Ventures I LLC (“Intellectual Ventures I”) is a Delaware limited liability company having its principal place of business located at 3150 139th Avenue SE, Bellevue, Washington, 98005.

2. Intellectual Ventures II LLC (“Intellectual Ventures II”) is a Delaware limited liability company having its principal place of business located at 3150 139th Avenue SE, Bellevue, Washington, 98005.

3. Upon information and belief, Motorola Mobility is a Delaware limited liability company with its principal place of business at 600 North U.S. Highway 45, Libertyville, Illinois 60048 as well as substantial operations at 8000 W. Sunrise Blvd., Plantation, Florida 33322. On information and belief, Motorola Mobility has substantial ties to this district. *See, e.g., Motorola*

Mobility, Inc. v. Apple Inc., Case No. 10-CV-23580, Dkt. No. 47, which details Motorola Mobility's substantial ties to the district.

JURISDICTION AND VENUE

4. This is a civil action for patent infringement under the Patent Laws of the United States, 35 U.S.C. § 1 *et. seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§1331 and 1138(a).

5. This Court has general personal jurisdiction over Motorola Mobility because it is engaged in substantial and not isolated activity in this judicial district. This Court has specific jurisdiction over Motorola Mobility because it has committed acts giving rise to this action and has established minimum contacts within this judicial district such that the exercise of jurisdiction over Motorola Mobility would not offend traditional notions of fair play and substantial justice.

6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§1391(b)-(c) and 1400(b) because Motorola Mobility has conducted business in this district and/or provided services to its customers within this judicial district, and has committed acts of patent infringement within this district giving rise to this action.

INTELLECTUAL VENTURES AND THE PATENTS-IN-SUIT

7. Intellectual Ventures Management, LLC ("Intellectual Ventures") was founded in 2000. Since its founding, Intellectual Ventures has been deeply involved in the business of invention. Intellectual Ventures creates inventions and files patent applications for those inventions; collaborates with others to develop and patent inventions; and acquires and licenses patents from individual inventors, universities and other institutions. A significant aspect of

Intellectual Ventures' business is managing the Plaintiffs in this case, Intellectual Ventures I and Intellectual Ventures II.

8. Intellectual Ventures' business includes purchasing important inventions from individual inventors and institutions and then licensing the inventions to those who need them. Through this business, Intellectual Ventures allows inventors to reap a financial reward from their innovations, which is frequently difficult for individual inventors to do. To date, Intellectual Ventures has acquired more than 70,000 IP assets and, in the process, has paid individual inventors hundreds of millions of dollars for their inventions. Intellectual Ventures, in turn, has earned more than \$3 billion by licensing these patents to some of the world's most innovative and successful technology companies who continue to use them to make computer equipment, software, semiconductor devices, and a host of other products.

9. Intellectual Ventures also creates inventions. Intellectual Ventures has a staff of scientists and engineers who develop ideas in a broad range of fields, including agriculture, computer hardware, life sciences, medical devices, semiconductors, and software. Intellectual Ventures has invested millions of dollars developing such ideas and has filed hundreds of patent applications on its inventions every year, making it one of the top patent filers in the world. Intellectual Ventures has also invested in laboratory facilities to assist with the development and testing of new ideas.

10. Intellectual Ventures also creates inventions by collaborating with inventors and research institutions around the world. For example, Intellectual Ventures has developed inventions by selecting a technical challenge, requesting proposals for inventions to solve the challenge from inventors and institutions, selecting the most promising ideas, rewarding the inventors and institutions for their contributions, and filing patent applications on the ideas.

Intellectual Ventures has invested millions of dollars in this way and has created a network of more than 4,000 inventors worldwide.

11. On August 4, 1998, U.S. Patent No. 5,790,793 (“the ’793 Patent”), titled “Method and System To Create, Transmit, Receive and Process Information, Including An Address To Further Information,” was duly and lawfully issued by the United States patent and Trademark Office (“PTO”). A copy of the ’793 Patent is attached hereto as Exhibit A.

12. Intellectual Ventures I is the owner and assignee of all right, title and interest in and to the ’793 Patent and holds the right to sue and recover damages for infringement thereof, including past damages.

13. On November 14, 2006, U. S. Patent No. 7,136,392 (“the ’392 Patent”), titled “System and Method For Ordering Data Messages Having Differing Levels of Priority For Transmission Over A Shared Communication Channel,” was duly and lawfully issued by the PTO. A copy of the ’392 Patent is attached hereto as Exhibit B.

14. Intellectual Ventures I is the owner and assignee of all right, title and interest in and to the ’392 Patent and holds the right to sue and recover damages for infringement thereof, including past damages.

15. On September 19, 2000, U.S. Patent No. 6,121,960, (“the ’960 Patent”), titled “Touch Screen Systems and Methods,” was duly and lawfully issued by the PTO. A copy of the ’960 Patent is attached hereto as Exhibit C.

16. Intellectual Ventures II is the owner and assignee of all right, title and interest in and to the ’960 Patent and holds the right to sue and recover damages for infringement thereof, including past damages.

17. On June 3, 2008, U.S. Patent No. 7,382,771 (“the ’771 Patent”), titled “Mobile Wireless Hotspot System,” was duly and lawfully issued by the PTO. A copy of the ’771 Patent is attached hereto as Exhibit D.

18. Intellectual Ventures II is the owner and assignee of all right, title and interest in and to the ’771 Patent and holds the right to sue and recover damages for infringement thereof, including past damages.

19. On July 21, 2009, U.S. Patent No. 7,564,784 (“the ’784 Patent”), titled “Method and Arrangement For Transferring Information In A Packet Radio Service,” was duly and lawfully issued by the PTO. A copy of the ’784 Patent is attached hereto as Exhibit E.

20. Intellectual Ventures I is the owner and assignee of all right, title and interest in and to the ’784 Patent and holds the right to sue and recover damages for infringement thereof, including past damages.

21. On January 2, 2001, U.S. Patent No. 6,170,073 (“the ’073 Patent”), titled “Method And Apparatus For Error Detection In Digital Communications,” was duly and lawfully issued by the PTO. A copy of the ’073 Patent is attached hereto as Exhibit F.

22. Intellectual Ventures I is the owner and assignee of all right, title and interest in and to the ’073 Patent and holds the right to sue and recover damages for infringement thereof, including past damages.

23. On December 7, 2010, U.S. Patent No. 7,848,353 (“the ’353 Patent”), titled “Method, Communication System And Communication Unit For Synchronisation For Multi-Rate Communication,” was duly and lawfully issued by the PTO. A copy of the ’353 Patent is attached hereto as Exhibit G.

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