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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

LOCATA LBS LLC, a California limited liability company,

Plaintiff,

v.

YELLOWPAGES.COM LLC, a Delaware limited liability company, and YP Holdings LLC, a Delaware limited liability company

Defendants.

CASE NO.: 2:13-cv-07664

COMPLAINT FOR PATENT INFRINGEMENT

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Plaintiff Locata LBS LLC ("Locata LBS") hereby alleges patent infringement against Defendants Yellowpages.com LLC ("YP") and YP Holdings LLC ("YP Holdings") on personal knowledge and information and belief, as follows:

THE PARTIES

1. Locata LBS is a California limited liability company with a principal location at 5716 Corsa Avenue, Suite 110, Westlake Village, CA 91362.

2. On information and belief, Defendant YP is a Delaware limited liability company with a principal place of business at 611 North Brand Boulevard Suite 500, Glendale, CA 94085. Defendant YP is a wholly owned subsidiary of Defendant YP Holdings. Defendant YP Holdings is a Delaware limited liability company with a principal place of business at 2247 Northlake Parkway, Tucker, GA 30084.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. Personal jurisdiction and venue are proper in this district under 28 U.S.C. §§ 1391 and 1400(b). On information and belief, Defendants YP and YP Holdings have a regular and established place of business in this district, have transacted business in this district, and/or has committed, contributed to, and/or induced acts of patent infringement in this district.

5. On information and belief, Defendants are subject to this Court's specific and general personal jurisdiction consistent with the principles of due process and/or the California Long Arm Statute, due at least to its substantial business in this forum directly related to the allegations set forth herein, including: (i) a portion of the infringement alleged herein, including making, using, selling, offering to sell, and/or importing products, methods and/or systems that infringe the patent-in-suit; (ii) the presence of established distribution and/or marketing channels; and (iii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or

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deriving substantial revenue from goods and services provided to individuals and entities in California and this judicial district.

COUNT I

INFRINGEMENT OF UNITED STATES PATENT NO. 6,259,381

6. United States Patent No. 6,259,381, entitled "Method of Triggering An Event" ("'381 Patent"), was duly issued by the United States Patent and Trademark Office on July 10, 2001 to Locata Corporation Pty. Ltd. ("Locata PTY"), an Australian company specializing in location based technologies since 1997. Locata LBS is the exclusive owner by assignment of all rights in and to the '381 Patent, including but not limited to the right to sue for past and present damages. A true and correct copy of the '381 Patent is attached to this Complaint as Exhibit A.

7. On information and belief, Defendants YP and YP Holdings have been and are directly infringing, inducing others to infringe, and/or contributorily infringing, literally, under the doctrine of equivalents, and/or jointly, one or more claims of the '381 Patent in the State of California, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering to sell, and/or importing systems and methods that implement, utilize or otherwise embody the patented invention, including by way of example location-based services, such as Dynamic Store Locator and Mobile Display Ads, which are described or have been described at least in part online at http://www.yellowpages.com/welcome/store-locator and http://adsolutions.yp.com/. Therefore, Defendants YP and YP Holdings are liable for infringement of the '381 Patent.

8. Defendants YP and YP Holdings have been and are inducing and/or contributing to the direct infringement of the '381 Patent by at least, but not limited to, customers and end-users of its products, including but not limited Dynamic Store Locator and Mobile Display Ads, who directly implement or use the accused systems, products and services, which have no substantial non-infringing uses, by at least the

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following affirmative acts: (1) advertising in public and marketing the features, benefits and availability of the accused systems, products, and services; (2) promoting the adoption and installation of the accused systems, products and services; and (3) providing instructions on how to use the accused systems, products and services.

9. Defendants YP and YP Holdings have knowledge of the '381 Patent and have had the specific knowledge that its location-based services described above infringe the '381 Patent, since at least the filing of this complaint.

10. Locata LBS has been and is irreparably harmed by Defendants YP and YP Holdings' infringement of the '381 Patent. Locata LBS has incurred and will continue to incur substantial damages, including monetary damages, unless Defendants are enjoined from further acts of infringement.

PRAYER FOR RELIEF

WHEREFORE, Locata LBS respectfully requests that this Court:

(a) enter judgment in favor of Locata LBS that Defendants have infringed, and continue to infringe, a valid and enforceable '381 Patent;

(b) enjoin Defendants, its officers, subsidiaries, agents, servants, employees, and all persons in active concert with any of them, from any further infringement of the '381 Patent;

(c) award Locata LBS all monetary relief available under the patent laws of the United States, including but not limited to actual damages, pre- and post-judgment interest, enhanced damages, and costs pursuant to 35 U.S.C. § 284;

(d) declare this case exceptional and award Locata LBS its reasonable attorneys' fees pursuant to 35 U.S.C. § 285; and

(e) grant Locata LBS such other relief as the Court deems just and equitable.

DEMAND FOR JURY TRIAL

Locata LBS demands a trial by jury on all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Glaser Weil Fink Jacobs Howard Avchen & Shapiro LLP

Date: October 16, 2013

Respectfully submitted,

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