IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TECHNOLOGY INNOVATIONS, LLC,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 11-690-SLR
v.	)	
	)	**JURY TRIAL DEMANDED**
AMAZON.COM, INC.,	)	
	)	
Defendant.	)	

AMAZON'S MOTION TO DISMISS

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant, Amazon.com, Inc. ("Amazon"), moves to dismiss United States Patent Number 5,517,407 ("the '407 Patent") from the suit filed by Plaintiff, Technology Innovations, LLC ("TI"), because the complaint fails to allege sufficient facts to support a claim of infringement of the '407 Patent on which relief may be granted. The Kindle e-reader cannot be found to infringe the '407 Patent under any possible claim construction. The inclusion of the '407 Patent in this case is meritless, and it should be dismissed.

The grounds for this motion are set forth in the accompanying memorandum.

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Dated: September 30, 2011
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CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on September 30, 2011, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I further certify that on September 30, 2011, the attached document was Electronically Mailed to the following person(s):

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