IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BOADIN TECHNOLOGY, LLC, Plaintiff, v. BLOOMBERG L.P., Defendant.	)	Civil Action No._____ **JURY TRIAL DEMANDED**

COMPLAINT

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

THE PARTIES

1. Boadin is a Delaware limited liability company with a place of business located at 113 Barksdale Professional Center, Newark, Delaware 19711.

2. Defendant Bloomberg L.P. ("Bloomberg") is a Delaware limited partnership with, upon information and belief, a place of business located at 731 Lexington Avenue, New York, New York 10022.

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. Upon information and belief, Bloomberg conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in

other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in Delaware.

6. Venue is proper in this District pursuant to §§ 1391(b), (c) and 1400(b).

THE PATENTS-IN-SUIT

7. On July 10, 2012, United States Patent No. 8,219,615 (the "'615 patent"), entitled "Instantaneous Symbol Lookup," was duly and lawfully issued by the USPTO. A true and correct copy of the '615 patent is attached hereto as Exhibit A.

8. On July 10, 2012, United States Patent No. 8,219,906 (the "'906 patent"), entitled "Instantaneous Symbol Lookup," was duly and lawfully issued by the U.S. Patent and Trademark Office ("USPTO"). A true and correct copy of the '906 patent is attached hereto as Exhibit B.

9. Boadin is the assignee and owner of the right, title and interest in and to the '615 and '906 patents, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 8,219,615

10. Boadin repeats and realleges the allegations of paragraphs 1 through 9 as if fully set forth herein.

11. Without license or authorization and in violation of 35 U.S.C. § 271(a), Bloomberg has infringed and continues to infringe one or more claims of the '615 patent by making, using, offering for sale, and/or selling within this district and elsewhere in the United States and/or importing into this district and elsewhere in the United States, certain computer program products, including without limitation via the website www.bloomberg.com (the "Bloomberg Website"), that embody the subject matter

claimed in the '615 patent. A copy of relevant portions of the Bloomberg Website is attached as Exhibit C.

12. Boadin is entitled to recover from Bloomberg the damages sustained by Boadin as a result of Bloomberg's infringement of the '615 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 8,219,906

13. Boadin repeats and realleges the allegations of paragraphs 1 through 12 as if fully set forth herein.

14. Without license or authorization and in violation of 35 U.S.C. § 271(a), Bloomberg has infringed and continues to infringe one or more claims of the '906 patent by making, using, offering for sale, and/or selling within this district and elsewhere in the United States and/or importing into this district and elsewhere in the United States, certain computer program products, including without limitation via the Bloomberg iPad app ("Bloomberg for iPad"), that embody the subject matter claimed in the '906 patent. A copy of relevant portions of Bloomberg for iPad is attached as Exhibit D.

15. Boadin is entitled to recover from Bloomberg the damages sustained by Boadin as a result of Bloomberg's infringement of the '906 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

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

PRAYER FOR RELIEF

WHEREFORE, Boadin requests that this Court enter judgment against Defendants as follows:

A. An adjudication that Bloomberg has infringed the '615 patent;

B. An adjudication that Bloomberg has infringed the '906 patent;

C. An award of damages to be paid by Bloomberg adequate to compensate Boadin for Bloomberg's past infringement of the '615 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs and expenses as justified under 35 U.S.C. § 284 and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

D. An award of damages to be paid by Bloomberg adequate to compensate Boadin for Bloomberg's past infringement of the '906 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs and expenses as justified under 35 U.S.C. § 284 and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

E. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Boadin's reasonable attorneys' fees; and

F. An award to Boadin of such further relief at law or in equity as the Court deems just and proper.

Dated: July 10, 2012

STAMOULIS & WEINBLATT LLC

/s/ Richard C. Weinblatt

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