IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BOADIN TECHNOLOGY, LLC, Plaintiff, v. CNBC LLC, 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 CNBC LLC ("CNBC") is a Delaware limited liability company with, upon information and belief, a place of business located at 900 Sylvan Avenue Englewood Cliffs, New Jersey 07632.

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, CNBC 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 PATENT-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. Boadin is the assignee and owner of the right, title and interest in and to the '615 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

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

9. Boadin repeats and realleges the allegations of paragraphs 1 through 8 as if fully set forth herein.

10. Without license or authorization and in violation of 35 U.S.C. § 271(a), CNBC 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.cnbc.com (the "CNBC Website"), that embody the subject matter claimed in the '615 patent. A copy of relevant portions of CNBC Website is attached as Exhibit B.

11. Boadin is entitled to recover from CNBC the damages sustained by Boadin as a result of CNBC'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.

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 CNBC has infringed the '615 patent;

B. An award of damages to be paid by CNBC adequate to compensate Boadin for CNBC'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;

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

D. 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

Stamatios Stamoulis #4606
stamoulis@swdelaw.com
Richard C. Weinblatt #5080
weinblatt@swdelaw.com
Two Fox Point Centre
6 Denny Road, Suite 307
Wilmington, DE 19809
Telephone: (302) 999-1540

Attorneys for Plaintiff
Boadin Technology, LLC