IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PRAGMATUS TELECOM, LLC, Plaintiff, v. REED ELSEVIER US HOLDINGS INC., Defendant.	Civil Action No. _____ JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Pragmatus Telecom, LLC ("Pragmatus") complains and alleges as follows against Defendant Reed Elsevier US Holdings Inc. ("Reed Elsevier"):

THE PARTIES

1. Pragmatus is a limited liability company organized and existing under the laws of the Commonwealth of Virginia with its principal place of business at 601 North King Street, Alexandria, Virginia 22314.

2. Pragmatus is informed and believes that Reed Elsevier is a corporation organized and existing under the laws of the state of Delaware with its principal place of business in the United States at 125 Park Avenue, 23rd Floor, New York, New York 10017.

JURISDICTION AND VENUE

3. This is an action for patent infringement arising under the patent laws of the United States, United States Code, 35 U.S.C. § 271 et seq. This Court has subject matter jurisdiction over this action under Title 28 United States Code, §§ 1331 and 1338.

4. Pragmatus is informed and believes that this Court has personal jurisdiction over Reed Elsevier because Reed Elsevier is a corporation incorporated under the laws of the State of Delaware and has committed, and continues to commit, acts of infringement in Delaware. Pragmatus is informed and believes that Reed Elsevier also maintains a registered agent in

Delaware, namely The Corporation Trust Company, 1209 Orange Street, Wilmington, DE 19801.

5. Venue is proper under 28 U.S.C. §§ 1391 and 1400 because Reed Elsevier has committed acts of infringement in this district and/or is deemed to reside in this district.

THE PATENTS-IN-SUIT

6. On October 30, 2001, the United States Patent and Trademark Office ("USPTO") duly and legally issued United States Patent No. 6,311,231 ("the '231 Patent"), entitled "Method and System for Coordinating Data and Voice Communications Via Customer Contract Channel Changing System Using Voice Over IP." Pragmatus holds all right, title, and interest in and to the '231 Patent. A true and correct copy of the '231 Patent is attached as Exhibit A.

7. On December 23, 2003, the USPTO duly and legally issued United States Patent No. 6,668,286 ("the '286 Patent"), entitled "Method and System for Coordinating Data and Voice Communications Via Customer Contact Channel Changing System Over IP." Pragmatus holds all right, title and interest in and to the '286 Patent. A true and correct copy of the '286 Patent is attached as Exhibit B.

8. On January 2, 2007, the USPTO duly and legally issued United States Patent No. 7,159,043 ("the '043 Patent"), entitled "Method and System for Coordinating Data and Voice Communications Via Contact Channel Changing System." Pragmatus holds all right, title and interest in and to the '043 Patent. A true and correct copy of the '043 Patent is attached as Exhibit C.

COUNT I

(INFRINGEMENT OF THE '231 PATENT)

9. Pragmatus incorporates by reference herein the averments set forth in paragraphs 1 through 8 above.

10. Reed Elsevier has and continues to infringe directly one or more claims of the '231 Patent, including at least by using the system of claim 1 of the '231 Patent to provide LEXIS NEXIS live chat service over the Internet.

11. As a result of Reed Elsevier's acts of infringement, Pragmatus has suffered and will continue to suffer damages in an amount to be proved at trial.

COUNT II

(INFRINGEMENT OF THE '286 PATENT)

12. Pragmatus incorporates by reference herein the averments set forth in paragraphs 1 through 8 above.

13. Reed Elsevier has and continues to infringe directly one or more claims of the '286 Patent, including at least by using the system of claim 9 of the '286 Patent to provide LEXIS NEXIS live chat service over the Internet.

14. As a result of Reed Elsevier's acts of infringement, Pragmatus has suffered and will continue to suffer damages in an amount to be proved at trial.

COUNT III

(INFRINGEMENT OF THE '043 PATENT)

15. Pragmatus incorporates by reference herein the averments set forth in paragraphs 1 through 8 above.

16. Reed Elsevier has and continues to infringe directly one or more claims of the '043 Patent, including at least by using the system of claim 1 of the '043 Patent to provide LEXIS NEXIS live chat service over the Internet.

17. As a result of Reed Elsevier's acts of infringement, Pragmatus has suffered and will continue to suffer damages in an amount to be proved at trial.

PRAYER FOR RELIEF

WHEREFORE, Pragmatus respectfully requests the following relief:

a) A judgment that Reed Elsevier has infringed one or more claims of United States Patent Nos. 6,311,231, 6,668,286, and 7,159,043;

b) A judgment that United States Patent Nos. 6,311,231, 6,668,286, and 7,159,043 are valid and enforceable;

c) Pragmatus be awarded damages adequate to compensate Pragmatus for Reed Elsevier's infringement of United States Patent Nos. 6,311,231, 6,668,286, and 7,159,043 up until the date such judgment is entered, including prejudgment and post-judgment interest, costs, and disbursements as justified under 35 U.S.C. § 284 and, if necessary adequately to compensate Pragmatus for Reed Elsevier's infringement, an accounting;

d) A judgment that Pragmatus be awarded attorneys' fees, costs, and expenses incurred in prosecuting this action; and

e) A judgment that Pragmatus be awarded such further relief at law or in equity as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Pragmatus hereby demands trial by jury on all claims and issues so triable.

Dated: December 11, 2012

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)
919 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 777-0300
(302)777-0301
bfarnan@farnanlaw.com

Of Counsel

Margaret Elizabeth Day
Ian N. Feinberg
David L. Alberti
Clayton Thompson
Marc C. Belloli
Sal Lim
Yakov Zolotorev
FEINBERG DAY ALBERTI &THOMPSON LLP
401 Florence Street, Suite 200
Palo Alto, CA 94301
Telephone: (650) 618.4360
Facsimile: (650) 618.4368
eday@feinday.com
ifeinberg@feinday.com

dalberti@feinday.com
cthompson@feinday.com
mbelloli@feinday.com
slim@feinday.com
yzolotorev@feinday.com

Attorneys for Plaintiff
PRAGMATUS TELECOM, LLC