IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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| WEB COLLABORATION TECHNOLOGIES LLC, | ) | |
| | ) | C.A. No. _____ |
| Plaintiff, | ) | |
| v. | ) | |
| | ) | JURY TRIAL DEMANDED |
| CITRIX SYSTEMS, INC., | ) | |
| Defendant. | ) | |

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Web Collaboration Technologies LLC ("WCT") complains of the defendant, Citrix Systems, Inc. ("Citrix") as follows:

**NATURE OF LAWSUIT & SUBJECT MATTER JURISDICTION**

1. This is a claim for patent infringement arising under the patent laws of the United States. Title 28 of the United States Code, Section 1338(a) gives this Court exclusive subject matter jurisdiction over this Complaint.

**PARTIES AND PATENTS**

2. Plaintiff WCT is a Delaware limited liability corporation with its principal place of business at 6136 Frisco Square Blvd., Suite 385, Frisco, TX 75034.

3. Plaintiff WCT is the assignee of the entire right, title, and interest and thereby owns all substantial rights in and has standing to sue for infringement of, United States Patent No. 5,649,104, entitled "System For Allowing User of Any Computer To Draw Image Over That Generated By The Host Computer And Replicating The Drawn Image To Other Computers" (the "'104 Patent") (attached as Exhibit A), and United States Patent No. 5,819,038, entitled "Collaboration System For Producing Copies Of Image Generated By First Program On First

Computer On Other Computers And Annotating The Image By Second Program" (the "'038 Patent") (attached as Exhibit B).

4. Defendant Citrix is a Delaware corporation with its operational headquarters at 851 West Cypress Creek Road, Fort Lauderdale, FL, 33309. This Court has personal jurisdiction over Citrix by virtue of its residence in this judicial district, its tortious acts of patent infringement that have been committed in this judicial district, and its transaction of business in this district.

## VENUE

5. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(c)-(d) and 1400(b).

## CITRIX'S ACTS OF PATENT INFRINGEMENT

6. Defendant Citrix has infringed the '104 Patent and the '038 Patent through, among other activities, the manufacture, testing, use, importation, sale and/or offer for sale of certain remote collaboration products available to end users on its websites and through its hosting services. Known infringing products or services currently include Citrix Online GoToMeeting, and may include additional systems, services and technologies (to be determined in discovery) and/or methods generated by those additional systems, services and technologies offered by Defendant Citrix.

7. Defendant Citrix infringes the '104 Patent and '038 Patent by making, using, offering for sale, importing, or selling GoToMeeting, as well as by contracting with others to use, market, sell, offer to sell, or import GoToMeeting.

## DEMAND FOR RELIEF

WHEREFORE, Plaintiff WCT asks this Court to enter judgment against Citrix and against Citrix's respective subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

A. An award of damages adequate to compensate WCT for the infringement that has occurred, together with prejudgment interest from the date infringement of the '104 Patent and/or the '038 Patent began;

B. An award to WCT of all remedies available under 35 U.S.C. § 284;

C. An award to WCT of all remedies available under 35 U.S.C. § 285;

D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the '104 Patent and '038 Patent; and,

E. Such other and further relief as this Court or a jury may deem proper and just.

## JURY DEMAND

WCT demands a trial by jury on all issues so triable.

Respectfully submitted,

Dated: January 4, 2013

FARNAN LLP

/s/ Michael J. Farnan

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