IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

The Money Suite Company, Plaintiff, v. **21st Century Insurance and Financial Services, Inc.; 21st Century Insurance Group; Farmers Group, Inc.,** Defendants.	Civil Action No. **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

This is an action for patent infringement in which Plaintiff The Money Suite Company ("Money Suite) makes the following allegations against 21st Century Insurance and Financial Services, Inc., 21st Century Insurance Group, and Farmers Group, Inc. (collectively, "Defendants").

PARTIES

1. Money Suite is a Delaware corporation that maintains its principal place of business at 200 W. Broadway, Suite C, Missoula, Montana 59808.

2. On information and belief, Defendant 21st Century Insurance and Financial Services, Inc. is a Delaware corporation with its principal office at 3 Beaver Valley Road, Wilmington, Delaware 19803-1115.

3. On information and belief, Defendant 21st Century Insurance Group is a Delaware corporation with its principal office at 3 Beaver Valley Road, Wilmington, Delaware 19803-1115. On Information and belief, Defendant 21st Century Insurance Group has appointed the Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

4. On information and belief, Defendant Farmers Group, Inc. is a Nevada corporation with its principal place of business at 4680 Wilshire Blvd, Los Angeles, CA 90010. Defendant has appointed CSC Services of Nevada 2215-B Renaissance Dr., Las Vegas, NV 89119 as its agent for service of process.

JURISDICTION AND VENUE

5. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*, including § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendants because, among other reasons, Defendants 21st Century Insurance and Financial Services, Inc. and 21st Century Insurance Group are Delaware corporations with their principal places of business in Delaware, and all Defendants have done business in this District and have committed acts of patent infringement in this District to the harm of Money Suite in this District, by, among other things, using, selling, offering for sale, and importing infringing products and services in this District.

7. Venue is proper in this District under 28 U.S.C. §§ 1391(b)-(d) and 1400(b) because, among other reasons, Defendants 21st Century Insurance and Financial Services, Inc. and 21st Century Insurance Group are Delaware corporations with their principal places of business in Delaware, and all Defendants are subject to personal jurisdiction in this District, and have committed acts of patent infringement in this District. On information and belief, for example, Defendants have used, sold, offered for sale, and imported infringing products in this District.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,684,189

8. Money Suite is the owner as assignee of all rights, title and interest in and under United States Patent No. 6,684,189 ("the '189 patent"), which duly and legally issued on January 27, 2004, with Ronald B. Ryan and Ronald G. Marquart as the named inventors, for an apparatus

and method using front-end network gateways and search criteria for efficient quoting at a remote location. Attached hereto as Exhibit A.

9. Defendants have directly infringed, literally and/or under the doctrine of equivalents, at least claim 1 of the '189 patent, in this judicial district and elsewhere in the United States to the injury of Money Suite, by, among other things, having made, used, imported, offered for sale, and/or sold financial product quotation products and services that fall within the scope of the claims of the '189 patent, including but not necessarily limited to insurance quotation products and services provided at the www.21st.com website, including, for example, the auto insurance quote service on that website. By making, using, importing, offering for sale, and/or selling such products and services which fall within the scope of the '189 patent, including but not limited to using front-end network gateways and selection criteria entered at a remote computer terminal to conduct a search of multiple financial products for efficient quoting at a remote location and all like products and services, Defendants have injured Money Suite and are thus liable for infringement of the '189 patent pursuant to 35 U.S.C. § 271.

10. Defendants have committed these acts of infringement without license or authorization.

11. To the extent that facts learned in discovery show that Defendants' infringement of the '189 patent has been willful, Money Suite reserves the right to request such a finding at the time of trial.

12. As a result of Defendants' infringement of the '189 patent, Money Suite has suffered monetary damages and is entitled to a money judgment in an amount adequate to compensate for Defendants' infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendants, together with interest and costs as fixed by the Court.

13. This is an exceptional case within the meaning of 35 U.S.C. §285.

PRAYER FOR RELIEF

Money Suite respectfully requests the following relief:

A. That the Court declare that the '189 patent is valid and enforceable and that its claims have been infringed by Defendants as described herein;

B. That the Court award damages to Money Suite to which it is entitled for patent infringement;

C. That the Court award pre and post judgment interest on the damages to Money Suite;

D. That the Court award to Money Suite its costs and attorneys' fees incurred in this action; and

E. Such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Money Suite, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury on all issues so triable.

June 3, 2013

FARNAN LLP

/s/ Brian E. Farnan

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