IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ADVANCED ESCREENS LLC, Plaintiff, v. AMAZON.COM, INC, Defendant.	Civil Action No. _____ JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Advanced eScreens LLC, by way of Complaint against the above-named Defendant, alleges the following:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

THE PARTIES

2. Plaintiff Advanced eScreens is a limited liability company organized under the laws of the State of Delaware with its place of business at 1220 North Market Street, Suite 806, Wilmington, Delaware 19801.

3. Defendant Amazon.com, Inc. is a corporation organized under the laws of the State of Delaware with its principal place of business at 410 Terry Ave, North Seattle, WA, 98109. It may be served process through its Delaware Registered Agent: Corporation Service Company, 2711 Centerville Rd, Ste. 400, Wilmington, DE 19808.

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 of the United States Code.

5. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.

6. On information and belief, Defendant is subject to the jurisdiction of this Court by virtue of being incorporated in Delaware. On information and belief, Defendant is also subject to the jurisdiction of this Court by reason of its acts of patent infringement which have been committed in this Judicial District, and by virtue of its regularly conducted and systematic business contacts in this State. As such, Defendant has purposefully availed itself of the privilege of conducting business within this Judicial District; has established sufficient minimum contacts with this Judicial District such that it should reasonably and fairly anticipate being haled into court in this Judicial District; has purposefully directed activities at residents of this State; and, at least a portion of the patent infringement claims alleged herein arise out of or are related to one or more of the foregoing activities.

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

COUNT I – INFRINGEMENT OF U.S. PATENT No. 6,525,866

8. The allegations set forth in the foregoing paragraphs 1 through 7 are hereby re-alleged and incorporated herein by reference.

9. On February 25, 2003, United States Patent No. 6,525,866, titled "Electrophoretic Displays, Display Fluids for Use Therein, and Methods of Displaying Images," was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '866 Patent is attached as Exhibit A to this Complaint.

10. Advanced eScreens is the assignee and owner of the entire right, title, and interest in and to the ’866 Patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement.

11. In violation of 35 U.S.C. § 271(a), Defendant has directly infringed, and continues to directly infringe, the claims of the ’866 Patent both literally and under the doctrine of equivalents. Defendant’s infringement includes its making, testing, using, importing, selling, and offering to sell certain products comprising an electrophoretic display that practices the subject matter recited in one or more claims of the ’866 Patent, including but not limited to claims 1, 2, 6, 9, and 16. Defendant performs it infringing acts in the United States, including within this Judicial District, without the authorization of Advanced eScreens. The accused portable products include Defendant’s Kindle line of eReaders including but not limited to Kindle 1st Generation, Kindle 2nd Generation, Kindle DX, Kindle DX Graphite, Kindle 3rd Generation Wi-Fi and Wi-Fi/3G, Kindle 4th Generation, Kindle Touch Wi-Fi and Wi-Fi/3G, Kindle 5th Generation, and Kindle Paperwhite (collectively “Kindle”), plus variations of these models. Defendant infringes by making, using, testing, importing, providing, selling, and offering to sell its Kindles.

12. Advanced eScreens has been harmed by Defendant’s infringing activities.

JURY DEMAND

Cloud Satchel demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

WHEREFORE, Advanced eScreens respectfully requests that this Court enter judgment for Advanced eScreens and against Defendant as follows:

a. an adjudication that Defendant has infringed one or more claims of the ’866 Patent;

b. an award of damages to be paid by Defendant adequate to compensate Advanced eScreens for Defendant’s past infringement of any of the ’866 Patent claims, and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses, and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

c. an injunction ordering Defendant to pay an ongoing royalty in an amount to be determined for any continued infringement after the date judgment is entered;

d. an award of treble damages under 35 U.S.C. § 284;

e. a declaration finding this to be an exceptional case, and awarding Advanced eScreens attorney fees under 35 U.S.C. §285; and,

f. for such further relief at law and in equity as the Court deems just and proper.

Dated: August 2, 2013

STAMOULIS & WEINBLATT LLC

/s/ *Stamatios Stamoulis*

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