IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ANTENNATECH, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. _____
	)	
SUNOCO INC.	)	**JURY TRIAL DEMANDED**
	)	
Defendant.	)	
	)	

COMPLAINT

For its Complaint, Antennatech, LLC ("Antennatech"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Antennatech is a Delaware limited liability company with a place of business located at 3131 McKinney Ave, Suite 600, Dallas, Texas 75204.

2. Defendant Sunoco Inc. is a Pennsylvania corporation with, upon information and belief, a place of business at 1735 Market Street, Philadelphia, Pennsylvania 19103.

3. Upon information and belief, Defendant has registered with the Delaware Secretary of State to conduct business in Delaware.

JURISDICTION AND VENUE

4. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

5. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

6. Upon information and belief, Defendant 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 this district.

7. Venue is proper in this district pursuant to §§ 1391(b), (c) and 1400(b).

THE PATENT-IN-SUIT

8. On February 7, 2012, United States Patent No. 8,112,131 (the "'131 patent"), entitled "Radiative Focal Area Antenna Transmission Coupling Arrangement" was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '131 patent is attached hereto as Exhibit A.

9. Antennatech is the assignee and owner of the right, title and interest in and to the '131 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. 8,112,131

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

11. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe at least claim 1 of the '131 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, products or services that, among other features, facilitate near-field communication ("NFC") with a communication device that has a radiative antenna configured for NFC communication.

12. Antennatech is entitled to recover from Defendant the damages sustained by Antennatech as a result of Defendant's infringement of the '131 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

Antennatech hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Antennatech requests that this Court enter judgment against Defendant as follows:

A. An adjudication that Defendant has infringed the '131 patent;

B. An award of damages to be paid by Defendant adequate to compensate Antennatech for Defendant's past infringement of the '131 patent 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. A declaration that this case is exceptional under 35 U.S.C. § 285 and an award of Antennatech's reasonable attorneys' fees; and

D. An award to Antennatech of such further relief at law or in equity as the Court deems just and proper.

Dated: June 24, 2014

STAMOULIS & WEINBLATT LLC

/s/ Richard C. Weinblatt

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