IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

Interface IP Holdings LLC, Plaintiff, v. Singapore Airlines Limited, Defendant.	)	Civil Action No. _____ **DEMAND FOR JURY TRIAL**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Interface IP Holdings LLC ("Interface IP"), by and through its undersigned counsel, files this Complaint for Patent Infringement against Defendant Singapore Airlines Limited ("Defendant") as follows:

The Parties

1. Plaintiff Interface IP is a limited liability company duly organized and existing under the laws of California, having its principal place of business in Foster City, California.

2. Upon information and belief, Defendant is a foreign corporation with its principle place of business at Airline House, 25 Airline Rd., 819829, Singapore.

Nature of the Action

3. This is a civil action for the infringement of United States Patent Nos. 7,080,325 ("the '325 patent"), 7,406,663 ("the '663 patent") and 7,500,201 ("the '201 patent") (collectively, "the Patents-in-Suit") under the Patent Laws of the United States 35 U.S.C. § 1 *et seq*.

Jurisdiction and Venue

4. This Court has jurisdiction over the subject matter of this action pursuant to

28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, including 35 U.S.C. § 271 *et seq*.

5. This Court has personal jurisdiction over Defendant because, upon information and belief, Defendant conducts or has conducted business in Delaware. Upon information and belief, Defendant has committed and/or participated in the commission of patent infringement in Delaware and elsewhere in the United States, and has harmed and continues to harm Interface IP in Delaware.

6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

The Patents-in-Suit

7. On July 18, 2006, the ’325 patent, titled “Graphical Device For Comprehensive Viewing And Input Of Variable Data Via A Browser-Based Display,” was duly and lawfully issued by the United States Patent and Trademark Office (“PTO”). The ’325 patent is attached hereto as Exhibit A.

8. On July 29, 2008, the ’663 patent, titled “Graphical Input Device With Dynamic Field Width Adjustment For Input Of Variable Data Via A Browser-Based Display,” was duly and lawfully issued by the PTO. The ’663 patent is attached hereto as Exhibit B.

9. On March 3, 2009, the ’201 patent, titled “Data Input Method And System With Multi-Sub-Field Matching Of User Entries Into A Graphical Input Device,” was duly and lawfully issued by the PTO. The ’201 patent is attached hereto as Exhibit C.

10. Interface IP owns the ’325, ’663 and ’201 patents and holds the right to sue and recover damages for infringement thereof, including past infringement.

Count 1

Infringement of U.S. Patent No. 7,080,325

11. Paragraphs 1-10 are incorporated by reference as if fully restated herein.

12. Defendant has directly infringed, and continues to directly infringe, in the United States of America, at least claim 1 of the ’325 patent under 35 U.S.C. § 271, literally and/or

under the doctrine of equivalents, by using and/or operating websites that practice at least claim 1 including, for example, www.singaporeair.com.

13. Interface IP has been and continues to be damaged by Defendant's infringement of the '325 patent.

Count 2

Infringement of U.S. Patent No. 7,406,663

14. Paragraphs 1-13 are incorporated by reference as if fully restated herein.

15. Defendant has directly infringed, and continues to directly infringe, in the United States of America, at least claim 1 of the '663 patent under 35 U.S.C. § 271, literally and/or under the doctrine of equivalents, by using and/or operating websites that practice at least claim 1 including, for example, www.singaporeair.com.

16. Interface IP has been and continues to be damaged by Defendant's infringement of the '663 patent.

Count 3

Infringement of U.S. Patent No. 7,500,201

17. Paragraphs 1-16 are incorporated by reference as if fully restated herein.

18. Defendant has directly infringed, and continues to directly infringe, in the United States of America, at least claim 1 of the '201 patent under 35 U.S.C. § 271, literally and/or under the doctrine of equivalents, by using and/or operating websites that practice at least claim 1 including, for example, www.singaporeair.com.

19. Interface IP has been and continues to be damaged by Defendant's infringement of the '201 patent.

Prayer for Relief

Wherefore, Plaintiff Interface IP respectfully requests that this Court enter judgment against Defendant as follows:

a) adjudging that the Defendant has infringed, literally or under the doctrine of equivalents, the Patents-in-Suit;

b) awarding Interface IP the damages to which it is entitled under 35 U.S.C. § 284 for Defendant's past infringement and any continuing or future infringement up until the date Defendant is finally and permanently enjoined from further infringement, and ordering a full accounting of same;

c) awarding Interface IP pre-judgment and post-judgment interest on its damages; and

d) awarding Interface IP such other and further relief in law or equity that the Court deems just and proper.

Demand for Jury Trial

Interface IP hereby demands a trial by jury on all claims and issues so triable.

Dated: October 20, 2014

FARNAN LLP

/s/ Brian E. Farnan

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