IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

Interface IP Holdings LLC, Plaintiff, v. Fareportal, Inc., 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 Fareportal, Inc. ("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 New York Corporation with its principle place of business in New York, New York.

Nature of the Action

3. This is a civil action for the infringement of United States Patent No. 7,500,201 ("the '201 patent") (or, "the Patent-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).

Patent-in-Suit

7. 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 A.

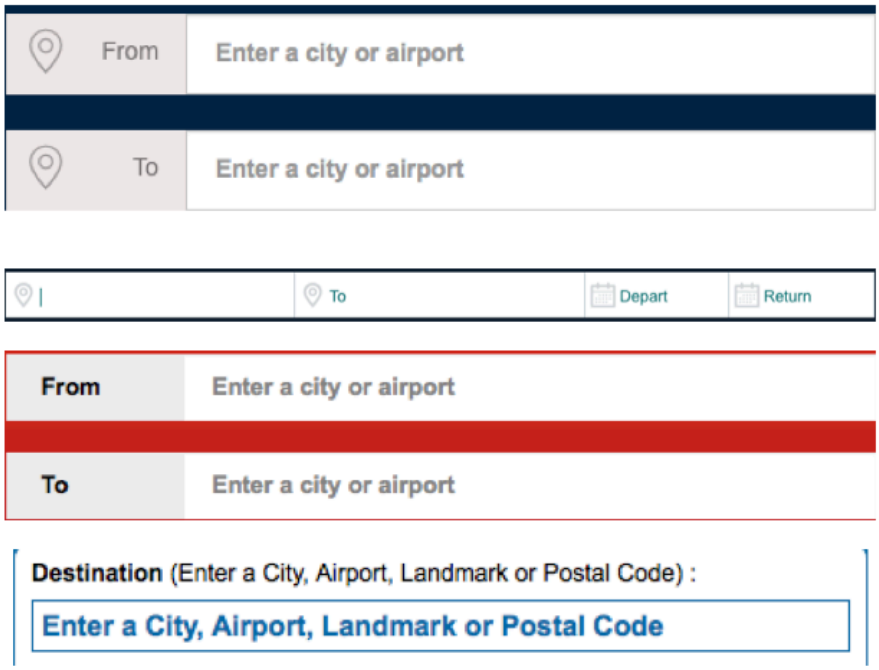
8. Interface IP owns the ’201 patent and holds the right to sue and recover damages for infringement thereof, including past infringement.

Count

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

9. Paragraphs 1-8 are incorporated by reference as if fully restated herein.

10. Defendant has directly infringed, and continues to directly infringe, at least claim 1 of the ’201 patent under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, by using and/or operating one or more input fields of a graphical input device on its websites that practice at least claim 1 including, *e.g.*, the input fields of the graphical input devices at www.cheapoair.com, www.onetravel.com, www.farebuzz.com, and www.cheapostay.com shown below respectively:



11. Defendant has indirectly infringed and continues to indirectly infringe the '201 patent under 35 U.S.C. § 271(b), literally and/or under the doctrine of equivalents, by actively, knowingly, and intentionally inducing infringement of the '201 patent by others (*e.g.,* Defendant's customers, distributors, partners, and/or third parties).

12. Upon information and belief, Defendant has been aware of the '201 patent at least since October 23, 2014.

13. Since Defendant has been on notice of the '201 patent, Defendant has actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '201 patent by others (*e.g.,* Defendant's customers, distributors, partners, and/or third parties) by using and/or operating one or more input fields of a graphical input device on its websites that practice at least claim 1 of the '201 patent including, *e.g.*, www.cheapoair.com, www.onetravel.com, www.farebuzz.com, and www.cheapostay.com, knowing of the '201 patent, knowing that others will use and/or operate its websites in an infringing manner, and knowing and intending to encourage and facilitate those infringing uses and/or operations of its websites through the creation and/or dissemination of promotional and marketing materials, including links to its websites.

14. To date, upon information and belief, Defendant continues the relevant operations of its websites and has not provided its customers and/or users of its websites instructions on how to avoid infringement since Defendant had notice of the ’201 patent. Defendant continues to disseminate the same promotional and marketing materials, including links to its websites, as before.

15. To date, upon information and belief, Defendant has not produced or relied upon an opinion of counsel related to the ’201 patent.

16. 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 ’201 patent;

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: April 10, 2015

FARNAN LLP

/s/ Brian E. Farnan

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