

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PICSEL (RESEARCH) LTD. and)	
PICSEL TECHNOLOGIES LTD.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No.
)	
APPLE INC.)	JURY TRIAL DEMANDED
)	
Defendant.)	

COMPLAINT

For their complaint against Defendant Apple, Inc. (hereafter “Apple”), Plaintiffs Picssel (Research) Ltd. and Picssel Technologies Ltd. (hereinafter “Plaintiffs”) allege as follows:

THE PARTIES

1. Plaintiff Picssel (Research) Ltd. is a corporation existing and organized under the laws of Scotland in the United Kingdom (Company Number SC186224) and has its principal place of business at Titanium House, Braehead Business Park, King’s Inch Road, Glasgow, United Kingdom G51 4BP.

2. Plaintiff Picssel Technologies Ltd. is a corporation existing and organized under the laws of Scotland in the United Kingdom (Company Number SC211433) and has its principal place of business at Titanium House, Braehead Business Park, King’s Inch Road, Glasgow, United Kingdom G51 4BP.

3. Defendant Apple is a corporation existing and organized under the laws of the State of California and has its principal place of business at 1 Infinite Loop, Cupertino, California 95014.

JURISDICTION AND VENUE

4. This action arises under the Patent Laws of the United States, including, but not limited to, 35 U.S.C. §§1 *et seq.*

5. This Court has jurisdiction over the subject matter of this case under the provisions of 28 U.S.C. §§1331 and 1338(a).

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

7. Apple is subject to personal jurisdiction in this district.

GENERAL ALLEGATIONS

8. Plaintiffs are leaders in the research and design of graphical data processing and screen rendering technology. Plaintiffs have developed and patented technology that enables rapid processing of graphical data, such as data retrieved from a website, and accelerates the process of updating the display on a device, such as a mobile telephone or a personal digital assistant (“PDA”). Plaintiffs have invested millions of dollars in developing the technology covered by their patent.

9. Picsel (Research) Ltd. is the owner of the entire right, title and interest in and to U.S. Patent No. 7,009,626 entitled “Systems and Methods for Generating Visual Representations of Graphical Data and Digital Document Processing” (the “’626 patent”), a copy of which is attached hereto as Exhibit “A”.

10. The ‘626 patent was duly and legally issued on March 7, 2006. Majid Anwar is the inventor of the ‘626 patent. Dr. Anwar assigned his entire right, title and interest in and to the ‘626 patent, including all rights to recover damages for all infringements thereof, including past infringements, to a company named Picsel Technologies Ltd. (Company Number

SC186224) at the time the assignment was executed. On June 14, 2001, Picsel Technologies Ltd. changed its name to Picsel (Research) Ltd.

11. On June 14, 2001, a company named Picsel Research Ltd. (Company Number SC211433) changed its name to Picsel Technologies Ltd. Picsel Technologies Ltd. is now an exclusive licensee of the '626 patent in the United States and has the right to grant sublicenses under the '626 patent. Picsel Technologies Ltd. sells and licenses software products that employ the inventions described in the '626 patent.

12. Upon information and belief, Apple is in the business of making, using, selling, offering for sale and/or importing cellular phones and other handheld devices that are capable of browsing the internet that infringe the '626 patent. Examples of infringing Apple handheld devices include the Apple iPhone and Apple iPod Touch.

13. Upon information and belief, Apple, without Plaintiffs' authorization, is making, using, selling, offering for sale and/or importing handheld devices that infringe the '626 patent.

**CLAIM FOR
PATENT INFRINGEMENT**

14. Plaintiffs reallege and incorporate by reference paragraphs 1-13 of this Complaint.

15. Apple, without Plaintiffs' authorization, is directly infringing, contributing to the infringement, and/or actively inducing infringement of the '626 patent by making, using, selling, offering for sale and/or importing handheld devices covered by the '626 patent.

16. Apple's infringement of the '626 patent is intentional, willful, wanton and deliberate, without license, and with full knowledge of Plaintiffs' rights.

17. Plaintiffs have been damaged by Apple's acts of infringement.

18. On information and belief, unless restrained and enjoined by this Court, Apple will continue its acts of infringement and the resulting damages to Plaintiffs will be substantial, continuing and irreparable.

WHEREFORE, Plaintiffs pray that judgment be entered in their favor and against Apple, as follows:

A. That Apple's cellular phones and handheld devices, including the iPhone and iPod Touch handheld devices, be declared infringing products under 35 U.S.C. §271.

B. That Apple and its officers, directors, employees, agents, licensees, servants, successors, subsidiaries, assigns and any and all persons acting in privity or in concert with them, be preliminarily and permanently enjoined and restrained, under 35 U.S.C. §283, from infringing, contributing to infringement by others or inducing others to infringe the '626 patent, including, without limitation, the sale, offer to sell, use, importation, advertising, transfer, disposal or promotion of Apple's cellular phones and handheld devices, or the aiding and abetting of any other persons' performance of these acts.

C. That damages pursuant to 35 U.S.C. §284, together with prejudgment interest and costs, be awarded to Plaintiffs against Apple in an amount adequate to compensate Plaintiffs for Apple's infringement of the '626 Patent.

D. That the patent damages be increased to three times the amount awarded, as provided for under 35 U.S.C. §284.

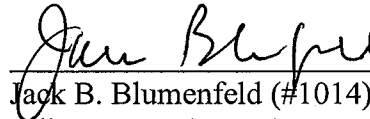
E. That the Court declare this to be an exceptional case and award Plaintiffs its attorneys fees pursuant to 35 U.S.C. §285; and

F. That the Court grant such further relief as it deems to be just and proper.

JURY DEMAND

Plaintiffs hereby demand a jury trial as provided by Rule 38(a) of the Federal Rules of Civil Procedure.

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