

JUDGE KENNELLY

MAGISTRATE JUDGE MASON

RCC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Illinois Computer Research, LLC)	
)	
)	
Plaintiff,)	Case Number:
)	
v.)	
)	JURY DEMANDED
Harpo Productions Inc.,)	
Sony Corporation of America, and)	
Sony Electronics Inc.)	
)	
Defendants.)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, Illinois Computer Research, LLC (ICR) complains of Defendants Harpo Productions Inc. (Harpo), Sony Corporation of America (Sony Corporation), and Sony Electronics Inc. (Sony Electronics) as follows:

PARTIES, JURISDICTION, AND VENUE

1. This is a claim for patent infringement arising under the patent laws of the United States, including 35 U.S.C. §§ 271, 281. This Court has exclusive jurisdiction over the subject matter of this action under 28 U.S.C. § 1338(a).

2. ICR is an Illinois corporation with its sole place of business in Chicago, Illinois.

3. The patent-in-suit is U.S. Patent No. 7,111,252 entitled Enhancing Touch And Feel On The Internet, which issued on September 19, 2006 (the 252 Patent, attached as Ex. A).

4. ICR owns and has all right, title and interest in the 252 Patent, including

all claims for damages by reason of past, present or future infringement, with the right to sue for and collect damages for the same and therefore has standing to sue for infringement of the 252 Patent.

5. Harpo is an Illinois corporation having its principal place of business at 110 N. Carpenter St., Chicago, IL 60607. Harpo designs, develops, offers for sale and sells products, that are covered by the claims of the 252 Patent nationwide, including this judicial district.

6. Sony Corporation is a New York corporation having its principal place of business at 550 Madison Avenue, New York, NY 10022. Sony Corporation designs, develops, offers for sale and sells products that are covered by the claims of the 252 Patent nationwide, including this judicial district.

7. Sony Electronics is a Delaware corporation having its principal place of business at 1 Sony Dr., Park Ridge, NJ 07656. Sony Electronics designs, develops, offers for sale and sells products that are covered by the claims of the 252 Patent nationwide, including this judicial district.

8. Venue is proper in this district under 28 U.S.C. §1400(b) because Harpo, Sony Corporation, and Sony Electronics are subject to personal jurisdiction, do business in and have committed acts of infringement in this judicial district.

PATENT INFRINGEMENT

9. The 252 Patent relates to an apparatus and method for obtaining and reviewing excerpts from a digital book for preview prior to purchase, but prevents the reader from obtaining and reviewing the entire book prior to purchase.

10. Harpo has infringed the claims of the 252 Patent at least by making,

using, importing, selling or offering to sell, and by inducing, aiding and abetting, encouraging or contributing to others use of its Oprah Book Club product.

11. The acts of infringement set forth above have occurred in this judicial district, such as through Harpo's website that reaches and instructs customers in this district to buy and use products.

12. Harpo's infringement has injured ICR, and ICR is entitled to recover damages adequate to compensate it for the infringement that has occurred, but in no event less than a reasonable royalty.

13. The infringement by Harpo has injured and will continue to injure ICR unless and until such infringement is enjoined by the Court.

14. Sony Corporation has infringed the claims of the 252 Patent at least by making, using, importing, selling or offering to sell, and by inducing, aiding and abetting, encouraging or contributing to others use of its Sony Bookreader product.

15. Sony Electronics has infringed the claims of the 252 Patent at least by making, using, importing, selling or offering to sell, and by inducing, aiding and abetting, encouraging or contributing to others use of its Sony Bookreader product.

16. The acts of infringement set forth above have occurred in this judicial district, such as through Sony Corporation's and/or Sony Electronics website that reaches and instructs customers in this district to buy and use products.

17. Sony Corporation's and Sony Electronics infringement has injured ICR, and ICR is entitled to recover damages adequate to compensate it for the infringement that has occurred, but in no event less than a reasonable royalty.

18. The infringement by Sony Corporation and Sony Electronics has injured

and will continue to injure ICR unless and until such infringement is enjoined by the Court.

WHEREFORE, Plaintiff, ICR, respectfully requests judgment against Harpo, Sony Corporation, and Sony Electronics, their subsidiaries and affiliates and all persons in active concert or participation with them as follows:

- A. An entry of judgment in favor of ICR and against Harpo, Sony Corporation, and Sony Electronics;
- B. An award of damages adequate to compensate ICR for the infringement, together with prejudgment interest from the date infringement began, but in no event less than a reasonable royalty as permitted by 35 U.S.C. §284; and
- C. Such other further relief as this Court or a jury may deem proper.

JURY DEMAND

ICR requests a trial by jury.

December 23, 2008

Illinois Computer Research, LLC.

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