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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON	
AT SE	EATTLE
DEEP WEB, LLC)
Plaintiff,	
V.) Case No. 14-cv-00664
IAC SEARCH & MEDIA, INC. d/b/a ASK.COM) COMPLAINT FOR) PATENT INFRINGEMENT)
Defendant.)) JURY TRIAL DEMANDED
	Veb, LLC ("Deep Web"), by and through the
undersigned counsel, alleges as follows:	
	ARTIES
1. Deep Web is a Washington corporation with a place of business at 15327	
184th Place NE, Woodinville, Washington 9	
	Media, Inc. d/b/a Ask.com is a Delaware
• •	elief, a place of business located at 555 12th
Street, Suite 500, Oakland, California 94607	
	<u>ON AND VENUE</u>
3. This action arises under the Pa	
	is proper in this Court under 28 U.S.C.
§§ 1331 and 1338.	
COMPLAINT FOR PATENT INFRINGEMEN	IT - 1 ROHDE & VAN KAMPEN PLLC 1001 Fourth Avenue, Suite 4050 Seattle, Washington 98154-1000 (206) 386-7353

5. 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.

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

BACKGROUND

7. On April 6, 2010, United States Patent No. 7,693,956 (the "'956 patent"), entitled "Accessing Deep Web Information Using a Search Engine," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '956 patent is attached hereto as Exhibit A.

8. On May 11, 2010, United States Patent No. 7,716,303 (the "'303 patent"), entitled "Accessing Deep Web Information Associated With Transportation Services Using A Search Engine," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '303 patent is attached hereto as Exhibit B.

9. On June 1, 2010, United States Patent No. 7,730,160 (the "'160 patent"), entitled "Accessing Deep Web Information Associated With Hospitality Services Using A Search Engine," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '160 patent is attached hereto as Exhibit C.

10. Deep Web is the assignee and owner of the right, title and interest in and to the '956, '303 and '160 patents, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

11. In February 2010, Deep Web made repeated attempts to contact Defendant to open patent licensing discussions outside the context of litigation. After the third such attempt Defendant responded that it was not interested in such discussions.

COMPLAINT FOR PATENT INFRINGEMENT - 2

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,693,956

12. Deep Web repeats and realleges the allegations of paragraphs 1 through 11 as if fully set forth herein.

13. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe the '956 patent by making, using, importing, offering for sale, and/or selling methods for searching dynamic web pages, including, but not limited to Ask.com, which are covered by one or more claims of the '956 patent.

14. Deep Web is entitled to recover from Defendant the damages sustained by Deep Web as result of Defendant's infringement of the '956 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.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 7,716,303

15. Deep Web repeats and realleges the allegations of paragraphs 1 through 14 as if fully set forth herein.

16. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe the '303 patent by making, using, importing, offering for sale, and/or selling methods and products for searching dynamic web pages associated with a transportation service, including, but not limited to Ask.com, which are covered by one or more claims of the '303 patent.

17. Deep Web is entitled to recover from Defendant the damages sustained by Deep Web as result of Defendant's infringement of the '303 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.

COMPLAINT FOR PATENT INFRINGEMENT - 3

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COUNT III - INFRINGEMENT OF U.S. PATENT NO. 7,730,160

18. Deep Web repeats and realleges the allegations of paragraphs 1 through 17 as if fully set forth herein.

19. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe the '160 patent by making, using, importing, offering for sale, and/or selling methods for searching dynamic web pages associated with a hospitality service, including, but not limited to Ask.com, which are covered by one or more claims of the '160 patent.

20. Deep Web is entitled to recover from Defendant the damages sustained by Deep Web as result of Defendant's infringement of the '160 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

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

PRAYER FOR RELIEF

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

A. An adjudication that Defendant has infringed the '956 and '303 patents;

B. An award of damages to be paid by Defendant adequate to compensate Deep Web for Defendant's past infringement of the '956, '303 and '160 patents 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 Deep Web's reasonable attorneys' fees; and

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

COMPLAINT FOR PATENT INFRINGEMENT - 4

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2	DATED this 2 nd day of May, 2014.
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7	<i>npaine@rvk-law.com</i> Attorneys for Plaintiff Deep Web, LLC
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