

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                            |   |                                     |
|----------------------------|---|-------------------------------------|
| Interface IP Holdings LLC, | ) |                                     |
|                            | ) |                                     |
| Plaintiff,                 | ) |                                     |
|                            | ) |                                     |
| v.                         | ) | Civil Action No. _____              |
|                            | ) |                                     |
| Societe Air France,        | ) |                                     |
|                            | ) |                                     |
| Defendant.                 | ) | <b><u>DEMAND FOR JURY TRIAL</u></b> |
| _____                      | ) |                                     |

**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 Societe Air France, (“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 principal place of business at 45, rue de Paris / 95747 Roissy CDG Cedex, France.

**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, at least claim 1 of the '325 patent under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents,

by using and/or operating one or more graphical input devices on its websites that practice at least claim 1 including, for example, the graphical input device at <http://www.airfrance.us> shown below:



13. Defendant has indirectly infringed and continues to indirectly infringe the '325 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 '325 patent by others (*e.g.*, Defendant's customers, distributors, partners, and/or third parties).

14. Upon information and belief, Defendant has been aware of the '325 patent at least since August 20, 2015.

15. Since Defendant has been on notice of the '325 patent, Defendant has actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '325 patent by others (*e.g.*, Defendant's customers, distributors, partners, and/or third parties) by using and/or operating one or more graphical input devices on its websites that practice at least claim 1 of the '325 patent including, for example, <http://www.airfrance.us>, knowing of the '325 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.

16. 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 '325 patent. Defendant continues to disseminate the same promotional and marketing materials, including links to its websites, as before.

17. To date, upon information and belief, Defendant has not produced or relied upon

an opinion of counsel related to the '325 patent.

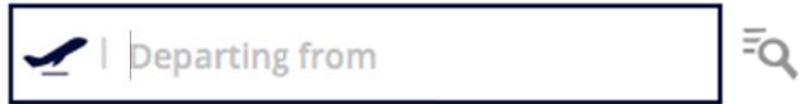
18. Interface IP has been and continues to be damaged by Defendant's infringement of the '325 patent.

**Count 2**

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

19. Paragraphs 1-18 are incorporated by reference as if fully restated herein.

20. Defendant has directly infringed, and continues to directly infringe, at least claim 1 of the '663 patent under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, by using and/or operating one or more graphical input devices on its websites that practice at least claim 1 including, for example, the graphical input device at <http://www.airfrance.us> shown below:



21. Defendant has indirectly infringed and continues to indirectly infringe the '663 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 '663 patent by others (*e.g.*, Defendant's customers, distributors, partners, and/or third parties).

22. Upon information and belief, Defendant has been aware of the '663 patent at least since August 20, 2015.

23. Since Defendant has been on notice of the '663 patent, Defendant has actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '663 patent by others (*e.g.*, Defendant's customers, distributors, partners, and/or third parties) by using and/or operating one or more graphical input devices on its websites that practice at least claim 1 of the '663 patent including, for example, <http://www.airfrance.us>, knowing of the '663 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.

24. 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 '663 patent. Defendant continues to disseminate the same promotional and marketing materials, including links to its websites, as before.

25. To date, upon information and belief, Defendant has not produced or relied upon an opinion of counsel related to the '663 patent.

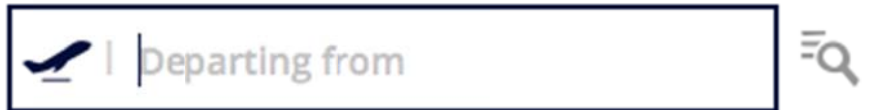
26. Interface IP has been and continues to be damaged by Defendant's infringement of the '663 patent.

### **Count 3**

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

27. Paragraphs 1-26 are incorporated by reference as if fully restated herein.

28. 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, for example, the input field of the graphical input device at <http://www.airfrance.us> shown below:



29. 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).

30. Upon information and belief, Defendant has been aware of the '201 patent at least

since August 20, 2015.

31. 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, for example, <http://www.airfrance.us>, 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.

32. 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.

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

34. 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;
- d) awarding Interface IP attorneys' fees pursuant to 35 U.S.C. § 285; and
- e) 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: March 17, 2016

Respectfully submitted,

FARNAN LLP

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