

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

I2Z TECHNOLOGY, LLC

Plaintiff,

V.

CITYGRID MEDIA, LLC,  
HOTPADS, INC.,  
AOL INC.,  
RM ACQUISITION, LLC,  
REDFIN CORPORATION,  
TRAVELOCITY.COM LP,  
TRIPADVISOR LLC,  
TRULIA, INC.,  
WEBMD, LLC,  
YAHOO! INC.,  
YELP! INC.,  
ZAGAT SURVEY, LLC,  
GOOGLE, INC.

Defendants.

Civil Case No. 1:11-cv-00811-LPS

## JURY TRIAL DEMANDED

**FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff I2Z TECHNOLOGY, LLC (“I2Z”), for its complaint against CityGrid Media, LLC (“CityGrid”), HotPads, Inc. (“HotPads”), AOL Inc. (“AOL”), RM Acquisition, LLC (“Rand McNally”), Redfin Corporation (“Redfin”), Travelocity.com LP (“Travelocity”), TripAdvisor LLC (“TripAdvisor”), Trulia, Inc. (“Trulia”), WebMD, LLC (“WebMD”), Yahoo! Inc. (“Yahoo”), Yelp! Inc. (“Yelp”), Zagat Survey, LLC (“Zagat”), and Google Inc. (“Google”) (collectively, “Defendants”) demands a jury trial and alleges as follows:

## NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*, brought against Defendants for violations of those laws.

2. Plaintiff I2Z is a Texas company with its principal place of business at 3301 W. Marshall Avenue, Suite 302, Longview, Texas 75604.

3. Upon information and belief, Defendant CityGrid is a Delaware company with its principal place of business at 8833 Sunset Blvd., West Hollywood, California 90069.

4. Upon information and belief, Defendant HotPads is a Delaware company with its principal place of business at 1420 17th St. NW, Washington, D.C. 20036-6423.

5. Upon information and belief, Defendant AOL is a Delaware corporation with its principal place of business at 22000 AOL Way, Dulles, Virginia 70802-6129.

6. Upon information and belief, Defendant Rand McNally is a Delaware company with its principal place of business at 9855 Woods Drive, Skokie, Illinois 60077.

7. Upon information and belief, Defendant Redfin is a Delaware corporation with its principal place of business at 2025 1st Avenue Suite 600, Seattle, Washington 98121-2158.

8. Upon information and belief, Defendant Travelocity is a Delaware partnership with its principal place of business at 3150 Sabre Drive, Southlake, Texas 76092.

9. Upon information and belief, Defendant TripAdvisor is a Delaware company with its principal place of business at 141 Needham Street, Newton, Massachusetts 02464.

10. Upon information and belief, Defendant Trulia is a Delaware corporation with its principal place of business at 116 New Montgomery Street, Suite 300, San Francisco, California 94105.

11. Upon information and belief, Defendant WebMD is a Delaware company with its principal place of business at 111 8th Avenue, New York, New York 10011.

12. Upon information and belief, Defendant Yahoo is a Delaware corporation with its principal place of business at 701 First Avenue, Sunnyvale, California 94089.

13. Upon information and belief, Defendant Yelp is a Delaware corporation with its principal place of business at 706 Mission Street, Fl 7, San Francisco, California 94103.

14. Upon information and belief, Defendant Zagat is a Delaware company with its principal place of business at 4 Columbus Circle, New York, NY 10019.

15. Upon information and belief, Defendant Google is a Delaware corporation with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043-1351.

### **JURISDICTION**

16. This action arises under the patent laws of the United States, Title 35 of the United States Code, § 1 *et seq.*

17. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

18. Upon information and belief, CityGrid has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to CityGrid's products and services within this District.

19. Upon information and belief, HotPads has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to HotPads' products and services within this District.

20. Upon information and belief, AOL has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and

continues to engage in sales and other conduct with respect to AOL's products and services within this District.

21. Upon information and belief, Rand McNally has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to Rand McNally's products and services within this District.

22. Upon information and belief, Redfin has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to Redfin's products and services within this District.

23. Upon information and belief, Travelocity has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to Travelocity's products and services within this District.

24. Upon information and belief, TripAdvisor has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to TripAdvisor's products and services within this District.

25. Upon information and belief, Trulia has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to Trulia's products and services within this District.

26. Upon information and belief, WebMD has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to WebMD's products and services within this District.

27. Upon information and belief, Yahoo has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to Yahoo's products and services within this District.

28. Upon information and belief, Yelp has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to Yelp's products and services within this District.

29. Upon information and belief, Zagat has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to Zagat's products and services within this District.

30. Upon information and belief, Google has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Delaware and has engaged and continues to engage in sales and other conduct with respect to Google's products and services within this District.

#### **FACTUAL BACKGROUND**

31. I2Z is a software, Internet services, web site development, and web site hosting company.

32. On September 6, 1994, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 5,345,551 (“the ’551 patent”), entitled “Method and System for Synchronization of Simultaneous Displays of Related Data Sources.”

33. A true and correct copy of the ’551 patent is attached as Exhibit A to this Complaint.

34. I2Z is the owner by assignment of all right, title, and interest in and to the ’551 patent.

### **CITYGRID**

35. CityGrid, through its website [www.Citysearch.com](http://www.Citysearch.com) (“the CitySearch website”), provides recommendations, comments, and address listings.

36. The CitySearch website displays maps and address information.

37. The CitySearch website displays two separate frames of data present on the screen, including a map demonstrating the locations of particular establishments as well as address listings and a vertical menu bar with selection criteria.

38. Between these two separate frames on the CitySearch website, there is a visible cause and effect.

39. The cause (changes to the selection criteria) must be manipulated to affect the map and address listings.

40. The address listings and the map change as a response to the selected criteria.

41. The cause and effect are consistent so that when selections are removed, the original map and listings are shown.

### **HOTPADS**

42. HotPads, through its website at [www.Hotpads.com](http://www.Hotpads.com) (“the HotPads website”), offers a map based real estate search engine listing homes for sale, apartments, condos, and rental houses.

43. The HotPads website displays maps and detailed property information.

44. The HotPads website displays two separate frames of data present on the screen, including a map demonstrating the locations and icons for particular properties and property information.

45. Between these two separate frames on the HotPads website, there is a visible cause and effect.

46. Changes to the map made by selecting an icon for a particular property must be manipulated to affect the particularized property information.

47. The property information changes as a response to the selections of property on the map.

48. The cause and effect are consistent so that when selections are removed the property information returns to its original form.

### **AOL**

49. AOL, through its website [www.Mapquest.com](http://www.Mapquest.com) (“Mapquest”), provides maps, directions, and location-based services via online and wireless offerings.

50. Mapquest displays two separate frames of data present on the screen, including a map demonstrating the highlighted driving route and driving directions.

51. Between these two separate frames on Mapquest, there is a visible cause and effect.

52. Changes to the map made by dragging the highlighted route affect the driving directions.

53. The directions change as a response to the highlighted route.

54. The cause and effect are consistent so that when the highlighted route is returned to the original position, the original directions are shown.

### **RAND McNALLY**

55. Rand McNally, through its website [www.Randmcnally.com](http://www.Randmcnally.com) (“the Rand McNally website”), provides services such as maps, navigation, travel information and planning services.

56. The Rand McNally website displays two separate frames of data present on the screen, including a map demonstrating the locations of particular businesses and detailed location information listings including addresses and reviews.

57. Between these two separate frames on the Rand McNally website, there is a visible cause and effect.

58. Changes to the map made by zooming in or out affect the listings.

59. The listings change as a response to the changes made to the map by zooming in or out.

60. The cause and effect are consistent so that when the changes to the map are removed the listings return to their original form.

### **REDFIN**

61. Redfin, through its website [www.Redfin.com](http://www.Redfin.com) (“the Redfin website”), provides real estate search and brokerage services using an online real estate search on its website [Redfin.com](http://Redfin.com).



62. The Redfin website displays two separate frames of data present on the screen, including a map demonstrating the locations of particular properties and detailed listings including addresses and prices.

63. Between these two separate frames on the Redfin website, there is a visible cause and effect.

64. The changes to the map made by zooming in or out affect the listings.

65. The listings change as a response to the changes made to the map by zooming in or out.

66. The cause and effect are consistent so that when the changes are removed from the map the listings return to their original form.

### **TRAVELOCITY**

67. Travelocity provides travel information on its website [www.travelocity.com](http://www.travelocity.com) (“the Travelocity website”).

68. The Travelocity website displays two separate frames of data present on the screen, including a map demonstrating the locations of particular hotels and detailed vertical menu including hotel criteria including ratings and price ranges.

69. Between these two separate frames on the Travelocity website, there is a visible cause and effect.

70. The changes made to the criteria must be manipulated to affect the map demonstrating hotel locations.

71. The map demonstrating hotels changes as a response to the changes made to the criteria.

72. The cause and effect are consistent so that when the changes are removed from the criteria the map returns to its original form.

### **TRIPADVISOR**

73. TripAdvisor provides travel information on its website [www.TripAdvisor.com](http://www.TripAdvisor.com) (“the TripAdvisor website”).

74. The TripAdvisor website displays two separate frames of data present on the screen, including a map demonstrating the locations of particular hotels and detailed vertical menu including hotel criteria including ratings and price ranges.

75. Between these two separate frames on the TripAdvisor website, there is a visible cause and effect.

76. The changes made to the criteria affect the map demonstrating hotel locations.

77. The map demonstrating hotels changes as a response to the changes made to the criteria.

78. The cause and effect are consistent so that when changes to the criteria are removed the map returns to its original form.

### **TRULIA**

79. Trulia, through its website at [www.Trulia.com](http://www.Trulia.com) (“the Trulia website”), offers real estate location maps and listing information at [www.trulia.com](http://www.trulia.com).

80. The Trulia website displays maps and detailed property information.

81. The Trulia website displays two separate frames of data present on the screen, including a map demonstrating the locations of particular real estate listings and real estate listing information.

82. Between these two separate frames on the Trulia website, there is a visible cause and effect.

83. The changes to the map made by zooming in or out affect the real estate listings.

84. The real estate listings change as a response to the changes made to the map by zooming in or out.

85. The cause and effect are consistent so that when changes made to the map are removed the real estate listings return to their original form.

### **WEBMD**

86. WebMD provides health information services in the form of online healthcare information, decision-support applications, and communications services on its website at [www.webmd.com](http://www.webmd.com) (“the WebMD website”).

87. The WebMD website displays a symptom checker which indicates symptoms and conditions associated with those symptoms.

88. The WebMD website displays two separate frames of data present on the screen, including a list of possible symptoms on the left side of the screen and conditions associated with the selected symptoms on the right side of the screen.

89. Between these two separate frames on the WebMD website, there is a visible cause and effect.

90. The changes made to symptoms made by selecting one from the list must affect the conditions associated with that symptom.

91. The conditions associated change as a response to the symptoms selected.

92. The cause and effect are consistent so that as symptom selections are removed the conditions associated are also removed.

**YAHOO**

93. Yahoo provides maps and directions on its website <http://maps.yahoo.com/> (“Yahoo Maps”).
94. Yahoo Maps displays two separate frames of data present on the screen, including a map demonstrating the highlighted driving route and driving directions.
95. Between these two separate frames on Yahoo Maps, there is a visible cause and effect.
96. The changes to the map made by dragging the highlighted route affect the driving directions.
97. The directions change as a response to the highlighted route.
98. The cause and effect are consistent so that when changes to the highlighted route are removed the directions return to their original form.
99. Yahoo provides maps and contact information on its website <http://local.yahoo.com> (“Yahoo Local”).
100. Yahoo Local displays separate frames present on the screen, including a map demonstrating the locations and a separate panel showing selection options.
101. Between these two separate frames on Yahoo Local, there is a visible cause and effect.
102. The changes to the selections affect the map and the address listings and ratings.
103. The address listings change as a response to the selections.
104. The cause and effect are consistent so that when changes to the selections are removed the addresses, map, and ratings return to their original forms.

**YELP**

105. Yelp provides maps and directions on its website [www.yelp.com](http://www.yelp.com) (“the Yelp website”).

106. The Yelp website displays two separate frames of data present on the screen, including a map demonstrating locations of businesses and address information.

107. Between these two separate frames on the Yelp website, there is a visible cause and effect.

108. The changes to the map made by changing the area in view affect the address information.

109. The address information changes as a response to the area covered by the map.

110. The cause and effect are consistent so that when the area is returned to its original frame, the address information also returns to its original form.

**ZAGAT**

111. Zagat provides maps and address information for restaurants on its website at [www.Zagat.com](http://www.Zagat.com) (“the Zagat website”).

112. The Zagat website displays two separate frames of data present on the screen including selection criteria panel and detailed restaurant listings.

113. Between these two separate frames on the Zagat website, there is a visible cause and effect.

114. The changes to the selection criteria affect the restaurant listings.

115. The restaurant listings change as a response to the selections made.

116. The cause and effect are consistent so that when selection criteria are removed, the listings return to their original form.

**GOOGLE**

117. Google provides an internet search engine as well as web related products including the website Google.com/flights (“Google Flights”).

118. Google Flights displays maps and flight information.

119. Google Flights displays two separate frames of data present on the screen, including selection panel demonstrating flight options and flight listings showing flight information.

120. Between these two separate frames on Google Flights, there is a visible cause and effect.

121. Changes to the selection criteria affect the flight listings.

122. The flight listings change as a response to the changes to selection criteria.

123. The cause and effect are consistent so that when the changes to the criteria are removed, the listings return to their original form.

124. Google’s website, Google.com displays maps and driving directions at Google.com/maps (“Google Maps”).

125. Google Maps displays two separate frames of data on the screen, including a map demonstrating the weather condition icons and weather condition information.

126. Between these two separate frames on Google Maps, there is a visible cause and effect.

127. Changes to the area covered by the map made by zooming in or out affect the weather condition information.

128. The information about weather conditions changes as a response to the area covered by the map.

129. The cause and effect are consistent such that when the area is returned to its original size, the information about weather conditions also return to the original form.

**COUNT 1**

**INFRINGEMENT OF U.S. PATENT NO. 5,345,551**

**(ALL DEFENDANTS)**

130. I2Z realleges and incorporates herein by reference the allegations contained in Paragraphs 1 through 129.

131. The Defendants have been, and continue to be, literally or equivalently infringing the '551 patent at least by making and/or using the infringing websites identified in paragraphs 35, 42, 49, 55, 61, 67, 73, 79, 86, 93, 99, 105, 111, 117, and 124 for the purpose of offering for sale and/or selling products and/or services. The Defendants have had knowledge of and/or been aware of the '551 patent since at least September 13, 2011, when I2Z filed Plaintiff's Original Complaint initiating this matter. Upon information and belief, the Defendants' infringement of the '551 patent since September 13, 2011 has been and continues to be willful and deliberate.

132. I2Z has been damaged by the Defendants' infringement, and will continue to suffer damages in the future.

133. I2Z is entitled to damages in accordance with 35 U.S.C. §§ 271, 281, 284, 285, and 287.

**JURY DEMAND**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, I2Z hereby respectfully requests a jury trial on all issues and claims so triable.

**PRAYER FOR RELIEF**

WHEREFORE, I2Z prays for judgment as follows:

- A. That the Defendants have infringed the '551 patent;
- B. That I2Z be awarded damages to be paid by Defendants adequate to compensate I2Z for Defendants' past infringement of the '551 patent and any continuing or future infringement through the date such judgment is entered, including interests, costs, expenses, and enhanced damages for any willful infringement as justified under 35 U.S.C. § 284, 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 I2Z's reasonable attorneys' fees;
- D. That I2Z be awarded pre-judgment and post-judgment interest; and
- E. That I2Z be awarded such other and further relief as this Court deems just and proper.

Dated: January 12, 2012

/s/ Richard C. Weinblatt

Stamatios Stamoulis #4606  
stamoulis@swdelaw.com  
Richard C. Weinblatt #5080  
weinblatt@swdelaw.com  
STAMOULIS & WEINBLATT LLC  
Two Fox Point Centre  
6 Denny Road, Suite 307  
Wilmington, DE 19809  
Telephone: (302) 999-1540

Steve Daniels (admitted *pro hac vice*)  
sdaniels@farneydaniels.com  
FARNEY DANIELS LLP  
800 S. Austin Avenue, Suite 200  
Georgetown, TX 78626  
Telephone: (512) 582-2828

*Attorneys for Plaintiff*  
*I2Z TECHNOLOGY, LLC*



**CERTIFICATE OF SERVICE**

I hereby certify that on January 12, 2012, I electronically filed the above document(s) with the Clerk of Court using CM/ECF which will send electronic notification of such filing(s) to all registered counsel.

/s/ Richard C. Weinblatt  
Richard C. Weinblatt #5080