

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SUFFOLK TECHNOLOGIES, LLC

Plaintiff,

V.

AOL INC. and GOOGLE INC.

Defendants.

Civil Action No. 1:12-CV-625 TSE/IDD

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT, PERMANENT INJUNCTION, AND DAMAGES; DEMAND FOR JURY TRIAL

Pursuant to Rule 15(a)(1)(B) of the Federal Rules of Civil Procedure, for its First Amended Complaint against Defendants AOL Inc. (“AOL”) and Google Inc. (“Google”) (collectively “Defendants”), Plaintiff Suffolk Technologies, LLC (“Suffolk” or “Plaintiff”) alleges as follows:

NATURE OF ACTION

1. British Telecommunications plc (“BT”) was a leader in developing innovative technology relating to the Internet, and this patent infringement action involves two such BT patents that have been assigned to Plaintiff Suffolk. This is a patent infringement action directed to, among other things, the common use by AOL and Google of so called “snippet” technology by which a customized summary is generated for a person conducting a search on the Internet. The identical instrumentality is being used by both AOL and Google to infringe United States Patent No. 6,334,132 entitled “Method and Apparatus For Creating a Customized Summary of

Text By Selection of Sub-Sections Thereof Ranked By Comparison to Target Data Items” (“the ’132 patent”).

2. This case also involves the infringement of a second BT patent, United States Patent No. 6,081,835 entitled “Internet Server and Method of Controlling an Internet Server” (“the ’835 patent”). The ’835 patented technology is directed to methods and apparatus by which a server selectively determines whether a file is going to be served and, if so, what a file is served and whether a customized file should be generated before service. The identical instrumentality and methods are being used by both AOL and Google to infringe the ’835 patent as well. AOL and Google are infringing the ’835 patent by virtue of their use of Google’s AdWords and AdSense services. Google is directly infringing the ’835 patent by virtue of services it provides through AdSense to selectively place Google AdWords advertisements for an advertiser’s product or service either (a) on the webpage of another, or (b) on a page of search results of a web publisher utilizing Google’s search services (“Google Network Member”) in response to a search query initiated by a computer end user. AOL is a Google Network Member. AOL is indirectly infringing the ’835 patent by inducing Google’s direct infringement of that patent. In addition, AOL is itself directly infringing the ’835 patent by virtue of services it provides through AOL’s proprietary “ad serving” technology to selectively place paid advertisements for a company’s product or service on a webpage.

JURISDICTION AND VENUE

3. This is a civil action arising under the laws of the United States relating to patents (35 U.S.C. §§ 271, 281, 283, 284, and 285). This court has original jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over AOL and Google. Defendants have extensive, systematic and continuous contacts with and dealings in the Commonwealth of

Virginia and with this District. Defendants have committed and continue to commit acts of infringement in this District.

5. Venue is proper in this District and Division under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b), and Local Civil Rule 3 because, on information and belief, Defendants have transacted business in this District, have advertised and solicited business in this District, have committed acts of infringement in this District, have established minimum contacts in this District, and have regular and established places of business in this Division.

THE PARTIES

6. Plaintiff Suffolk is a limited liability corporation duly organized and existing under the laws of the state of Delaware, with its address in Bridgewater, New Jersey.

7. Upon information and belief, Defendant AOL is a corporation duly organized and existing under the laws of the state of Delaware, with its corporate headquarters located in New York City. On information and belief, AOL owns and operates a corporate campus comprising office buildings, a data center and support facilities of approximately 840,000 square feet located at 22000 AOL Way, Dulles, Virginia 20166 where a significant portion of AOL's operations directed to Internet search functionality occurs and thousands of AOL employees work.

8. Upon information and belief, Defendant Google is a corporation organized under the laws of the State of Delaware, with its corporate headquarters and principal place of business at 1600 Amphitheater Parkway, Mountain View, California 94043. A portion of Google's operation is conducted at a location in Reston, Virginia, where, on information and belief, about fifty (50) employees work on research, development, or design for Google, and where search advertising infrastructure is found and is used to infringe the '132 and '835 patents (collectively, the "Patents-in-Suit"). Google also, on information and belief, has two other technical facilities within this District, one in Ashburn, Virginia and another in Virginia Beach, Virginia. In

litigation before this Court, Google has admitted that it has facilities in this District and that it employs workers in this District, and it has not contested venue in this District or this Court's exercise of personal jurisdiction over it.

JOINDER

9. Joinder of accused infringers AOL and Google as Defendants in this action is proper under 35 U.S.C. § 299. With respect to both of the '132 and the '835 patents, Suffolk asserts a right to relief against Defendants Google and AOL jointly, with respect to acts arising out of the same transaction, occurrence, and series of transactions and occurrences relating to the use of the same accused processes.

10. In its First Claim for Relief, herein, Suffolk alleges that Google is directly infringing the '132 patent and that AOL is liable for indirect infringement under 35 U.S.C. § 271(b) for actively inducing Google's direct infringement of the '132 patent with respect to the same accused process.

11. In its Second Claim for Relief, herein, Suffolk alleges that Google is directly infringing the '835 patent and that AOL, in addition to itself directly infringing the '835 patent, is also liable for indirect infringement under 35 U.S.C. § 271(b) for actively inducing Google's direct infringement of the '835 patent with respect to the same accused process.

PERTINENT BACKGROUND FACTS

12. Plaintiff Suffolk is the owner by assignment of the '132 patent and the '835 patent. The Patents-in-Suit were originally filed in the United States Patent and Trademark Office (the "PTO") by BT. BT is the world's oldest telecommunications company; its origins date back to the establishment of the first telecommunications companies in the United Kingdom, including the first commercial telegraph service, the Electric Telegraph Company, established in 1846.

13. Each of the inventors of the Patents-in-Suit was an employee of BT when the inventions contained in the Patents-in-Suit were conceived and when the application for each of the Patents-in-Suit was filed. Each of the named inventors of the Patents-in-Suit currently resides in Great Britain.

The '132 Patent and Defendants' Infringement

14. In the spring of 1998, BT employee Richard Weeks filed with the PTO an application for a United States patent entitled "Method and Apparatus for Creating a Customized Summary of Text by Selection of Sub-Sections Thereof Ranked by Comparison to Target Data Items." On December 25, 2001, the PTO duly and legally issued this application as the '132 patent. A true and correct copy of the '132 patent is attached hereto as Exhibit 1.

15. The inventions of the '132 patent provide, among other things, a means by which a customized summary of a set of data responsive to a computer user's search request is generated.

16. In general, the '132 patent accomplishes this by dividing the data set into sections and calculating a "ranking value" for each section depending on a comparison of one or more search terms to words in each section. The relevant summary is then compiled by selecting one or more of the sections according to their ranking values.

17. Whenever a user provides a search term for Google to search, Google returns a list of webpages that are responsive to the user's search term. For each webpage included in that list, Google provides a "snippet" ("Snippet"). A Snippet is a set of information concerning the content of the webpage. On information and belief, Google performs the methods claimed in the '132 patent to generate Snippets.

18. On information and belief, AOL has contracted to have Google provide responses to search requests initiated on AOL and AOL-affiliated websites ("AOL Websites"), which responses include Snippets. When a user visiting an AOL Website enters a search term, that

information is sent by AOL to Google's servers. In response, Google conducts a search and returns to the AOL Website a list of webpages that are responsive to the user's search term. Included in that list is, for each webpage, a Snippet that is generated by Google, as described above.

**The '835 Patent, Defendant AOL's Advertising Services
and Defendant Google's AdSense and AdWords Services**

19. On or about March 11, 1997, BT employees Stuart J. Antcliff, John C. Regnault, and Laurence D. Bradley filed with the PTO an application for a United States patent entitled "Internet Server and Method of Controlling an Internet Server." On June 27, 2000, the PTO duly and legally issued this application as the '835 patent. A true and correct copy of the '835 patent is attached hereto as Exhibit 2.

20. The inventions of the '835 patent provide, among other things, a means by which an Internet server (a device that stores and sends requested files) can determine, depending upon the identity of the requesting webpage, whether a webpage requesting a file is authorized to receive that file, and by which it can customize its file response in either of two ways: (1) it can choose to serve some but not all of the existing files that the requesting webpage is authorized to receive, and (2) it can generate a new file based upon stored information that the requesting webpage is authorized to receive in order to present information more relevant to the requesting computer.

21. In general, the patented '835 inventions accomplish this by programming the server in such a way that it can: (1) identify the webpage making the request for information by checking its identification signal; (2) compare the identification signal of the requesting webpage to a stored list of one or more identification signals; and (3) determine, based on the comparison, what existing file(s) to send or whether to generate and send one or more new files.

22. Defendant Google operates an Internet advertising service which includes Google's AdWords and AdSense services. AdWords enables users to create advertisements which will appear on relevant Google search results pages and on the webpages of Google Search Partners. Through AdSense, Google distributes for display on web publishers' webpages ads that, among other things, may be relevant to that webpage's content ("AdSense for Content"). In addition, Google distributes ads for display on a Google Network Member's webpages showing search results in response to a search initiated by a computer user on the Google Network Member's webpage ("AdSense for Search").

23. Through AdWords and/or AdSense (including but not limited to AdSense for Content and AdSense for Search), an advertiser can have its advertisements displayed on the webpages of websites that are part of the Google Network. Advertisers can create ads by using AdWords and specify targets for their advertisement, such as specific webpages or characteristics of webpages on which they want or do not want their advertisements to be shown. In addition, web publishers of the Google Network Member websites can specify the identity or characteristics of advertisements that they do or do not want to appear on the webpages of their websites. Thereafter, when a computer user visits the publisher's webpage, Google's server receives a request for one or more ad files. Google then determines if the request includes, among other things, the universal resource locator ("URL"), portion of the URL and/or other identification information ("Source Information") for the webpage from which the request is made.

24. Before serving ads to a webpage, Google compares the Source Information of the requesting webpage to a list of webpage Source Information stored in Google's server. Based on this comparison, Google decides which ad files, if any, to supply to the webpage in order to, among other things, (a) give effect to advertisers' identification of the webpages on which particular ads are permitted or are not permitted to appear, (b) give effect to the web publisher's

identification of webpages associated with advertisements that are or are not allowed to be shown on its webpages, and/or (c) provide ads that are contextually targeted to the content of, or otherwise appropriate to appear on, the requesting webpage.

25. Additionally, in the context of AdSense for Search, when Google receives a search request from a website that is part of the Google Network, Google sends not only the search results, but may also send one or more ad files that will appear on a search results page. On information and belief, before serving ads to a webpage, Google compares the Source Information of the webpage from which the search request was initiated to webpage Source Information stored on Google's server and, based on this comparison, decides which ad files to serve along with the search results. This is done in order to, among other things, (a) give effect to advertisers' identification of the webpages on which particular ads are permitted and not permitted to appear, (b) give effect to the web publisher's identification of webpages associated with advertisements that are or are not allowed to be shown on its webpages, or (c) provide ads that are contextually targeted to the content of, or otherwise appropriate to appear on, the webpage on which they will appear.

26. Defendant AOL offers for sale and sells Internet advertising services. AOL provides advertising services both through "AOL Properties" and the "Third Party Network."

27. AOL Properties include certain AOL owned and operated content, products and services, as well as co-branded websites owned or operated by third parties for which certain criteria have been met, including that the Internet traffic has been assigned to AOL. AOL generates advertising revenues from AOL Properties through the sale of display advertising and search and contextual advertising.

28. AOL also generates advertising revenues through the sale of advertising on third-party websites, which AOL refers to as the "Third Party Network."

29. At times throughout the past decade, AOL has also offered advertising services over what it referred to as the “AOL Network.” The AOL Network consisted of AOL Properties and any other product or service owned, operated, distributed, or authorized to be distributed by or through AOL or its Affiliates worldwide.

30. AOL markets its offerings to advertisers on both AOL Properties and the Third Party Network under the brand “AOL Advertising.” AOL markets its offerings to publishers on the Third Party Network under the brand “Advertising.com.” AOL has also marketed its advertising services under various brands and through various business units and subsidiaries, including but not limited to the Advertising.com Group, Advertising.com Sponsored Listings, Platform-A, AdSonar, TACODA, Inc., Quigo Technologies, Inc., Quigo Contextual Services Program, and ADTECH AG.

31. Using AOL’s advertising services referenced above, an advertiser can have its advertisements displayed on pages of websites that are or were members of the AOL Properties, the AOL Network or the Third Party Network.

32. AOL has provided and continues to provide advertising services in at least three different ways:

- a. For a portion of AOL’s advertising business, AOL uses proprietary optimization and targeting “ad serving technology” (*i.e.*, technology that places advertisements on websites and digital devices) to best match advertisers with available ad inventory. AOL also licenses this ad serving technology to third parties.
- b. For a portion of AOL’s advertising business, AOL contracts with Google for Google to provide advertising services on AOL Properties.
- c. For a portion of AOL’s advertising business, AOL contracts with Google for Google to provide AOL with a white label, modified version of Google’s search advertising system, including but not limited to Google’s AdWords and AdSense

services. A “white label” product or service is produced by one company (the producer) and rebranded by another company (the marketer) to make it appear as if the marketer produced the product or service. AOL uses the white label version of Google’s advertising system to pass requests from AOL to Google for advertisement files to be placed on a publisher’s website.

33. Upon information and belief, web publishers agree to have advertisements shown on a portion of their webpages by placing AOL-provided code within their webpages. Web publishers can specify the identity or characteristics of advertisements that they do or do not want to be shown on their webpages. Similarly, advertisers can provide AOL with information regarding the identity and characteristics of websites on which they do or do not want their ads to appear. When such a webpage is visited, AOL’s server receives a request for ad files from the webpage.

34. Upon information and belief, before serving an ad to a webpage using AOL’s proprietary ad serving technology, AOL’s server determines if the ad request contains Source Information for the webpage from which the request was made. AOL’s server then compares the Source Information of the webpage from which the request is made to Source Information stored by AOL, and based on that comparison, decides which ads, if any, to send to the webpage.

35. Upon information and belief, when an ad is served to a webpage through AOL’s use of Google’s AdSense and AdWords services (whether directly through Google or through AOL’s use of the white label version of Google’s advertising services), AOL’s server passes the ad request to Google’s server and Google’s server serves one or more ad files to the webpage in the manner described above in Paragraphs 23-24.

36. Additionally, on information and belief, when AOL serves ads to a search results page through AOL’s use of Google’s AdSense and/or AdWords services (whether directly through Google or through AOL’s use of the white label version of Google’s advertising

services), Google receives the search request from an AOL Website and, in response, Google sends not only the search results, but also one or more ad files in the manner described above in Paragraph 25. On information and belief, before serving ads and search results to an AOL Website, Google, among other things, compares the Source Information of the webpage from which the search request was initiated to Source Information stored in Google's server and, based on this comparison, decides which ad file(s), if any, to send and decides what search result should appear first in the list of search results that it sends.

FIRST CLAIM FOR RELIEF

Infringement of the '132 Patent against AOL and Google

37. Plaintiff incorporates herein by reference the allegations set forth in Paragraphs 1-36 of this Complaint as though fully set forth herein.

38. Defendant Google has been and is directly infringing claims of the '132 patent under 35 U.S.C. § 271(a) at least by generating, making, using, and selling, in the United States, Snippets in response to search terms provided to Google's servers.

39. Defendant AOL has been and is indirectly infringing claims of the '132 patent under 35 U.S.C. § 271(b) by actively inducing Google to generate, make, use, and sell, in the United States, Snippets in response to search terms entered by visitors to an AOL Website, in a manner that is covered by the claims of the '132 patent, with knowledge of the '132 patent, with knowledge that the acts AOL was causing to occur were covered by claims of the '132 patent, and with the specific intent to encourage Google's infringement of the '132 patent.

40. On or about December 3, 2008, Google was provided written notice of the existence of the '132 patent and therefore, by at least as early as December 3, 2008, Google was aware of the '132 patent.

41. On or about September 18, 2009, AOL was provided written notice of the existence of the '132 patent and its infringement of that patent, and therefore, by at least as early as September 18, 2009, AOL was aware of the '132 patent and of its infringement by AOL. Additionally, since at least as early as June 7, 2012 when this action was filed, AOL was aware that the way Google generates Snippets infringes the '132 patent, that Google is directly infringing the '132 patent, and that AOL is knowingly inducing Google's infringement of the '132 patent, and.

42. On or about September 18, 2009, and continuing through the present, AOL has operated as described above whereby search terms entered on an AOL Website are sent by AOL to Google for Google to conduct the search and provide search results, including Snippets. Upon information and belief, at that time, and continuing through the present, AOL actively caused, urged and encouraged Google to generate Snippets while AOL knew that the manner in which Google generated Snippets infringed the '132 patent. AOL has taken affirmative steps to bring about the infringement of the '132 patent by, among other things, continuing to send to Google search queries in response to which AOL requests that Google provide Snippets along with the responses to the search requests. AOL did so with the specific intent of inducing Google to infringe the '132 patent. Without receiving from AOL the requests to search initiated on an AOL Website, Google would not be able to generate responses, including Snippets, in the infringing manner in response to those requests. AOL actively participates in Google's infringement by providing Google with the requests in response to which Google generates Snippets in a manner covered by the '132 patent. At that time, and continuing through the present, AOL has continued to provide the infringing Snippets to its customers for the purpose of and with the expectation that doing so will increase computer users' visits to AOL Websites and advertisement viewings, ultimately adding to AOL's revenues and profits. Since September 18, 2009, AOL has evinced no intention of ceasing its encouragement of Google's infringement and

its provision of the infringing Snippets to visitors to AOL Websites. Therefore, by at least as early as September 18, 2009, AOL was aware of the '132 patent, was aware of Google's direct infringement of the '132 patent, and actively and knowingly induced that infringement.

43. Upon information and belief, Google's and AOL's infringement of the '132 patent has been and is willful, and will continue unless enjoined by the Court. Suffolk has suffered, and will continue to suffer, irreparable injury as a result of this willful infringement. Pursuant to 35 U.S.C. § 284, Suffolk is entitled to damages for infringement and treble damages. Pursuant to 35 U.S.C. § 283, Suffolk is entitled to a permanent injunction against further infringement.

44. This case is exceptional, and Suffolk therefore is entitled to attorneys' fees pursuant to 35 U.S.C. §285.

SECOND CLAIM FOR RELIEF

Infringement of the '835 Patent against AOL and Google

45. Plaintiff incorporates herein by reference the allegations set forth in Paragraphs 1 - 36 of this Complaint as though fully set forth herein.

46. Defendant Google has been and is directly infringing claims of the '835 patent under 35 U.S.C. § 271(a) by, among other ways, operating, using and selling its AdSense and AdWords services in the United States as described above in Paragraphs 22-25.

47. Defendant AOL has been and is directly infringing claims of the '835 patent under 35 U.S.C. § 271(a) by, among other ways, operating, using and selling in the United States the advertising services described in Paragraphs 26-31, 32(a), 33-34 above.

48. Additionally, AOL has been and is indirectly infringing claims of the '835 patent under 35 U.S.C. § 271(b) by actively inducing Google to generate, make, use and sell, in the United States, ads generated in a manner that is covered by the claims of the '835 patent, with

knowledge of the '835 patent, with knowledge that the acts AOL was causing would be covered by claims of the '835 patent, and with specific intent to encourage Google's infringement of the '835 patent.

49. On or about December 3, 2008 Google was provided written notice of the existence of the '835 patent and therefore, by at least as early as December 3, 2008, Google was aware of the '835 patent.

50. On or about September 18, 2009, AOL was provided written notice of the existence of the '835 patent and of its infringement of that patent in connection with its ad serving technology, and therefore, by at least as early as September 18, 2009, AOL was aware of the '835 patent and its infringement of it. Additionally, since at least as early as June 7, 2012 when this action was filed, AOL has known that the way Google operates AdSense and AdWords infringes the '835 patent, that Google is directly infringing the '835 patent and that AOL is indirectly infringing the '835 patent, and.

51. On or about September 18, 2009, and continuing to the present, upon information and belief, AOL was knowledgeable about the manner in which Google's AdSense and AdWords services operated and knew that Google generated ads in a manner that is covered by the claims of the '835 patent. By September 18, 2009, AOL had already had a long and extensive relationship with Google, centered around AOL's use of Google's AdSense and AdWords services, which AOL had been using for six years by then. For 2009, Google-related revenue represented 32% of all AOL advertising revenues that year, and comprised the vast majority of the search and contextual revenues generated on AOL Properties. AOL knew in September 2009 that its proprietary ad serving technology was sufficiently similar to Google's AdSense and AdWords services in ways relevant to the '835 patent, such that AOL knew in September 2009 that Google was directly infringing the '835 patent in connection with the AdSense and AdWords services that Google was providing to AOL and its customers.

52. After being notified of the existence of the '835 patent and the ways in which it was infringed, AOL did not stop causing Google to infringe the patent, and evinced no intention of stopping its inducement of Google's infringement. To the contrary, it continued to maintain and update its provision to its customers of infringing advertising services that AOL obtained from Google. Further, despite the knowledge that Google was infringing the '835 patent in connection with its provision of AdSense and AdWords services to AOL, AOL actively and knowingly caused, urged and encouraged that infringement by, among other things, extending and expanding its contractual relationship with Google in 2010 to continue through 2015.

53. Additionally, AOL has taken affirmative steps to bring about the infringement of the '835 patent by, among other things, continuing to send to Google search requests and requests for ad files in response to which it knew and intended Google would generate and make ads in a manner covered by the '835 patent and use and sell them. AOL did so with the specific intent of inducing Google to infringe the '835 patent. Without receiving from AOL the search requests and requests for ad files initiated on an AOL Website, Google would not be able to generate and serve in response thereto ads that were generated in a manner covered by the '835 patent. AOL actively participates in Google's infringement by providing Google with the search requests and requests for ad files in response to which Google generates ads in a manner covered by the '835 patent. At that time, and continuing through the present, AOL has continued to provide the infringing services to its customers for the purpose of and with the expectation that doing so will generate revenues and profits for AOL.

54. Upon information and belief, Google's and AOL's infringement of the '835 patent has been and is willful, and will continue unless enjoined by the Court. Suffolk has suffered, and will continue to suffer, irreparable injury as a result of this willful infringement. Pursuant to 35 U.S.C. § 284, Suffolk is entitled to damages for infringement and treble damages.

Pursuant to 35 U.S.C. § 283, Suffolk is entitled to a permanent injunction against further infringement.

55. This case is exceptional, and Suffolk therefore is entitled to attorneys' fees pursuant to 35 U.S.C. §285.

PRAYER FOR RELIEF

Suffolk respectfully requests the following relief:

1. that AOL be adjudged to have indirectly infringed the '132 patent and to have directly and indirectly infringed the '835 patent;
2. that Google be adjudged to have directly infringed the '132 and '835 patents;
3. that the Court enter a permanent injunction against AOL, and all others in active concert with it, prohibiting them from indirectly infringing the '132 patent and from directly and indirectly infringing the '835 patent;
4. that the Court enter a permanent injunction against Google, and all others in active concert with it, prohibiting them from directly infringing the '132 and '835 patents;
5. that the Court order an accounting for damages by virtue of AOL's infringement of the '132 and '835 patents;
6. that the Court order an accounting for damages by virtue of Google's infringement of the '132 and '835 patents;
7. that the Court award damages to Suffolk against AOL and Google, pursuant to 35 U.S.C. § 284;
8. that the Court treble the damages to Suffolk against AOL and Google for willful infringement pursuant to 35 U.S.C. § 284;
9. that the Court award Suffolk pre-judgment and post-judgment interest and its costs, pursuant to 35 U.S.C. §284;

10. that the Court award Suffolk attorneys' fees incurred in this action pursuant to 35 U.S.C. § 285; and,

11. that Suffolk be awarded such other and further relief as this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Suffolk hereby demands a trial by jury as to all issues triable by a jury.

Respectfully submitted,

Dated: August 3, 2012

/s/ Craig C. Reilly

Craig C. Reilly, Esq.
VSB # 20942
111 Oronoco Street
Alexandria, Virginia 22314
TEL (703) 549-5354
FAX (703) 549-2604
craig.reilly@ccreillylaw.com

Craig Thomas Merritt
VSB # 20281
R. Braxton Hill, IV
VSB # 41539
CHRISTIAN & BARTON LLP
ATTORNEYS AT LAW
909 East Main Street, Suite 1200
Richmond, Virginia 23219
804.697.4128 tel
804.697.6128 fax
cmerritt@cblaw.com
www.cblaw.com

Roderick G. Dorman, *Pro Hac Vice*
Jeanne Irving, *Pro Hac Vice*
Alan P. Block, *Pro Hac Vice*
Jeffrey Huang, *Pro Hac Vice*
MCKOOL SMITH HENNIGAN P.C.
865 South Figueroa Street, Suite 2900
Los Angeles, CA 90017
Telephone: (213) 694-1200
Facsimile: (213) 694-1234
Email:
rdorman@mckoolsmithhennigan.com
jirving@mckoolsmithhennigan.com
ablock@mckoolsmithhennigan.com
jhuang@mckoolsmithhennigan.com

and

Doug Cawley, *Pro Hac Vice*
J. Austin Curry, *Pro Hac Vice*
MCKOOL SMITH P.C.
300 Crescent Court
Suite 1500
Dallas, Texas 75201
Telephone: (214) 978-4000
Facsimile: (214) 978-4044
Email: dcawley@mckoolsmith.com
Email: acurry@mckoolsmith.com

ATTORNEYS FOR PLAINTIFF
SUFFOLK TECHNOLOGIES, LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2012, I electronically filed the foregoing using the CM/ECF system, which will send a notice of such filing (NEF) to the following:

Stephen E. Noona
(Virginia State Bar No. 25367)
Kaufman & Canoles, P.C.
150 W. Main Street, Suite 2100
Norfolk, VA 23510
Telephone: (757) 624.3239
Facsimile: (757) 624.3169
senoona@kaufcan.com

David A. Perlson (pro hac vice)
David L. Bilsker (pro hac vice)
Antonio R. Sistos (pro hac vice)
Margaret P. Kammerud (pro hac vice)
Rebecca A. Bers (pro hac vice)
Quinn Emanuel Urquhart & Sullivan, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700
davidperlson@quinnemanuel.com
davidbilsker@quinnemanuel.com
antoniosistos@quinnemanuel.com
megkammerud@quinnemanuel.com
rebeccabers@quinnemanuel.com

Counsel for Defendant Google Inc.

Stephen E. Noona
(Virginia State Bar No. 25367)
Kaufman & Canoles, P.C.
150 W. Main Street, Suite 2100
Norfolk, VA 23510
Telephone: (757) 624.3000
Facsimile: (757) 624.3169
senoona@kaufcan.com

Bradford P. Lyerla (*pro hac vice*)
Paul D. Margolis (*pro hac vice*)
Joseph A. Saltiel (*pro hac vice*)
Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654-3456
Tel (312) 840-7476
Fax (312) 840-7576
blyerla@jenner.com
pmargolis@jenner.com
jsaltiel@jenner.com

Counsel for Defendant AOL Inc.

/s/ Craig C. Reilly

Craig C. Reilly, Esq.
VSB # 20942
111 Oronoco Street
Alexandria, Virginia 22314
TEL (703) 549-5354
FAX (703) 549-2604
craig.reilly@ccreillylaw.com

ATTORNEYS FOR PLAINTIFF
SUFFOLK TECHNOLOGIES, LLC