

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

GEOTAG, INC.

PLAINTIFF,

v.

AROMATIQUE, INC.; ACADEMY, LTD.
D/B/A ACADEMY SPORTS + OUTDOORS
D/B/A ACADEMY SPORTS AND
OUTDOORS;; ASICS AMERICA CORP.;
AVON PRODUCTS, INC.; AT&T MOBILITY
LLC D/B/A AT&T MOBILITY; AT&T
SERVICES, INC.;
BESTBUY.COM LLC; BROWN JORDAN
INTERNATIONAL, INC. D/B/A BROWN
JORDAN; BROOKSTONE COMPANY, INC.;
CHRISTIAN DIOR PERFUMES LLC;
CRAFTMASTER MANUFACTURING, INC.
D/B/A CRAFTMASTER D/B/A CMI;
DOLLAR TREE, INC.; GAMESTOP CORP.;
GANDER MOUNTAIN COMPANY;
HINKLEY LIGHTING, INC.; KOHL'S
ILLINOIS, INC.; KOHL'S DEPARTMENT
STORES, INC.; KOHL'S CORPORATION;
MICHAELS STORES, INC.; NORDSTROM,
INC.; OLD NAVY, LLC; OSCAR DE LA
RENTA, LTD; PETSMART, INC.;
PETSMART STORE SUPPORT GROUP,
INC.; RICHEMONT NORTH AMERICA,
INC. D/B/A CARTIER; ROLEX WATCH
USA, INC.; SEVEN FOR ALL MANKIND
LLC; STERLING JEWELERS, INC. D/B/A
JARED THE GALLERIA OF JEWELRY
D/B/A KAY JEWELERS; KAY JEWELERS,
INC.; TARGET CORP.; THE TJX
COMPANIES, INC. D/B/A TJ MAXX; TOYS
"R" US, INC.; GEOFFREY, LLC; VAN
CLEEF & ARPELS, INC.; VF CORP. D/B/A 7
FOR ALL MANKIND D/B/A 7FAM D/B/A
SEVEN JEANS D/B/A LUCY
ACTIVEWEAR; SEVEN FOR ALL
MANKIND, LLC D/B/A 7FAM; VF
JEANSWEAR, L.P. D/B/A WRANGLER;

NO. 2:10-CV-570-TJW

JURY TRIAL DEMANDED

VF OUTDOOR, INC. D/B/A THE NORTH
FACE,

DEFENDANTS.

AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff GEOTAG, INC. files this Amended Complaint¹ against the Defendants named herein, namely AROMATIQUE, INC.; ASICS AMERICA CORP.; AT&T MOBILITY LLC D/B/A AT&T MOBILITY; AT&T SERVICES, INC.; ACADEMY, LTD. D/B/A ACADEMY SPORTS + OUTDOORS D/B/A ACADEMY SPORTS AND OUTDOORS; AVON PRODUCTS, INC.; BESTBUY.COM LLC; BROWN JORDAN INTERNATIONAL, INC. D/B/A BROWN JORDAN; BROOKSTONE COMPANY, INC.; CHRISTIAN DIOR PERFUMES LLC; CRAFTMASTER MANUFACTURING, INC. D/B/A CRAFTMASTER D/B/A CMI; DOLLAR TREE, INC.; GAMESTOP CORP.; GANDER MOUNTAIN COMPANY; HINKLEY LIGHTING, INC.; KOHL'S ILLINOIS, INC.; KOHL'S DEPARTMENT STORES, INC.; KOHL'S CORPORATION; MICHAEL'S STORES, INC.; NORDSTROM, INC.; OLD NAVY, LLC; OSCAR DE LA RENTA, LTD; PETSMART, INC.; PETSMART STORE SUPPORT GROUP, INC.; RICHEMONT NORTH AMERICA, INC. D/B/A CARTIER; ROLEX WATCH USA, INC.; SEVEN FOR ALL MANDKIND LLC; STERLING JEWELERS, INC. D/B/A JARED THE GALLERIA OF JEWELRY D/B/A KAY JEWELERS; KAY JEWELERS, INC.; TARGET CORP.; THE TJX COMPANIES, INC. D/B/A TJ MAXX; TOYS "R" US, INC.; GEOFFREY, LLC; VAN CLEEF & ARPELS, INC.; VF CORP. D/B/A 7 FOR ALL MANKIND D/B/A 7FAM D/B/A SEVEN JEANS D/B/A LUCY

¹ Geotag's complaint is being amended pursuant to Fed. R. Civ. P. 15(a)(1)(B).

ACTIVEWEAR; SEVEN FOR ALL MANKIND, LLC D/B/A 7FAM; VF JEANSWEAR, L.P. D/B/A WRANGLER; and VF OUTDOOR, INC. D/B/A THE NORTH FACE (collectively “Defendants”), as follows:

PARTIES

1. Plaintiff GEOTAG, INC. (“GEOTAG” or “Plaintiff”) has a place of business in Plano, Texas.

2. On information and belief, Defendant AROMATIQUE, INC. (“AROMATIQUE”) has a place of business in Heber Springs, Arkansas.

3. On information and belief, Defendant ACADEMY, LTD. D/B/A ACADEMY SPORTS + OUTDOORS D/B/A ACADEMY SPORTS AND OUTDOORS (“ACADEMY”) has a place of business in Katy, Texas.

4. On information and belief, Defendant ASICS AMERICA CORP. (“ASICS”) has a place of business in Irvine, California.

5. On information and belief, Defendant AT&T MOBILITY LLC D/B/A AT&T MOBILITY (“AT&T MOBILITY”) has a place of business in Atlanta, Georgia.

6. On information and belief, Defendant AT&T SERVICES, INC. (“AT&T SERVICES”) has a place of business in Dallas, Texas.

7. On information and belief, Defendant AVON PRODUCTS, INC. (“AVON”) has a place of business in New York, New York.

8. On information and belief, Defendant BESTBUY.COM LLC (“BEST BUY”) has a place of business in Richfield, Minnesota.

9. On information and belief, Defendant BROWN JORDAN INTERNATIONAL, INC. D/B/A BROWN JORDAN (“BROWN JORDAN”) has a place of business in Louisville, Kentucky.

10. On information and belief, Defendant BROOKSTONE COMPANY, INC. (“BROOKSTONE”) has a place of business in Merrimack, New Hampshire.

11. On information and belief, Defendant CHRISTIAN DIOR PERFUMES, LLC (“CHRISTIAN DIOR”) has a place of business in New York, New York.

12. On information and belief, Defendant CRAFTMASTER MANUFACTURING, INC. D/B/A CRAFTMASTER D/B/A CMI (“CRAFTMASTER”) has a place of business in Chicago, Illinois.

13. On information and belief, Defendant DOLLAR TREE, INC. (“DOLLAR TREE”) has a place of business in Chesapeake, Virginia.

14. On information and belief, Defendant GAMESTOP CORP. (“GAMESTOP”) has a place of business in Grapevine, Texas.

15. On information and belief, Defendant GANDER MOUNTAIN COMPANY (“GANDER MOUNTAIN”) has a place of business in St. Paul, Minnesota.

16. On information and belief, Defendant HINKLEY LIGHTING, INC. (“HINKLEY”) has a place of business in Cleveland, Ohio.

17. On information and belief, Defendant KOHL’S ILLINOIS, INC. has a place of business in Menomonee Falls, Wisconsin.

18. On information and belief, Defendant KOHL’S DEPARTMENT STORES, INC. has a place of business in Menomonee Falls, Wisconsin.

19. On information and belief, Defendant KOHL'S CORPORATION has a place of business in Menomonee Falls, Wisconsin. Hereinafter KOHL'S ILLINOIS, INC., KOHL'S DEPARTMENT STORES, INC., and KOHL'S CORPORATION are collectively referred to as "KOHL'S."

20. On information and belief, Defendant MICHAELS STORES, INC. ("MICHAELS") has a place of business in Austin, Texas.

21. On information and belief, Defendant NORDSTROM, INC. ("NORDSTROM") has a place of business in Seattle, Washington.

22. On information and belief, Defendant OLD NAVY, LLC has a place of business in San Francisco, California.

23. On information and belief, Defendant OCSCAR DE LA RENTA, LTD. ("OSCAR DE LA RENTA") has a place of business in New York, New York.

24. On information and belief, Defendant PETSMART, INC. has a place of business in Phoenix, Arizona.

25. On information and belief, Defendant PETSMART STORE SUPPORT GROUP, INC. has a place of business in Phoenix, Arizona. Hereinafter PETSMART, INC. and PETSMART STORE SUPPORT GROUP, INC. are collectively referred to as "PET SMART."

26. On information and belief, Defendant RICHEMONT NORTH AMERICA, INC. D/B/A CARTIER ("CARTIER") has a place of business in New York, New York.

27. On information and belief, Defendant ROLEX WATCH USA, INC. ("ROLEX") has a place of business in New York, New York.

28. On information and belief, Defendant SEVEN FOR ALL MANKIND LLC ("SEVEN") has a place of business in Vernon, California.

29. On information and belief, Defendant STERLING JEWELERS, INC. D/B/A JARED THE GALLERIA OF JEWELRY D/B/A KAY JEWELERS (“STERLING”) has a place of business in Akron, Ohio.

30. On information and belief, Defendant KAY JEWELERS, INC. has a place of business in Akron, Ohio. Hereinafter STERLING JEWELERS, INC. and KAY JEWELERS, INC. are collectively referred to as “STERLING”.

31. On information and belief, Defendant TARGET CORP. (“TARGET”) has a place of business in Nicollet Mall, Minnesota.

32. On information and belief, Defendant THE TJX COMPANIES, INC. D/B/A TJ MAXX (“TJ MAXX”) has a place of business in Framingham, Massachusetts.

33. On information and belief, Defendant TOYS “R” US, INC. has a place of business in Wayne, New Jersey.

34. On information and belief, Defendant GEOFFREY, LLC has a place of business in Wayne, New Jersey. Hereinafter TOYS “R” US, INC. and GEOFFREY, LLC are collectively referred to as “TOYS ‘R’ US.”

35. On information and belief, Defendant VAN CLEEF & ARPELS, INC. (“VAN CLEEF”) has a place of business in New York, New York.

36. On information and belief, Defendant VF CORPORATION D/B/A 7 FOR ALL MANKIND D/B/A 7FAM D/B/A SEVEN JEANS D/BA LUCY ACTIVEWEAR (“VFC”) has a place of business in Greensboro, North Carolina.

37. On information and belief, Defendant SEVEN FOR ALL MANKIND, LLC D/B/A 7FAM (“7FAM”) has a place of business in Greensboro, North Carolina.

38. On information and belief, Defendant VF JEANSWEAR, L.P. D/B/A WRANGLER (“WRANGLER”) has a place of business in Greensboro, North Carolina.

39. On information and belief, Defendant VF OUTDOOR, INC. D/B/A THE NORTH FACE (“VFO”) has a place of business in Greensboro, North Carolina. Hereinafter, VFC, 7FAM, WRANGLER and VFO are collectively referred to as “VF.”

JURISDICTION AND VENUE

1. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a). On information and belief, the Defendants are subject to this Court’s specific and general personal jurisdiction, pursuant to due process and/or the Texas Long Arm Statute, due at least to their substantial business in this forum, including related to the infringements alleged herein. Further, on information and belief, Defendants have interactive websites comprising infringing methods and apparatuses which are at least used in and/or accessible in this forum. Further, on information and belief, Defendants are subject to the Court’s general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to persons or entities in Texas.

2. Venue is proper in this district under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b). Without limitation, on information and belief, Defendants are subject to personal jurisdiction in this district. On information and belief, the Defendants are subject to this Court’s specific and general personal jurisdiction in this district, pursuant to due process and/or the Texas Long Arm

Statute, due at least to their substantial business in this district, including related to the infringements alleged herein. Further, on information and belief, Defendants have interactive websites comprising infringing methods and apparatuses which are at least used in and/or accessible in this district. Further, on information and belief, Defendants are subject to the Court's general jurisdiction in this district, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to persons or entities in this district.

3. Further, venue of this action is appropriate and convenient because this Court previously heard a parallel action for infringement of the same '474 patent in *Geomas (International), Ltd., et al. vs. Idearc Media Services-West, Inc., et al.*, Civil Action No. 2:06-CV-00475-CE ("the Geomas Lawsuit"). In the Geomas Lawsuit this Court considered and construed the terms and claims of the '474 patent, as set forth in the Court's Memorandum Opinion and Order issued on November 20, 2008.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 5,930,474

4. United States Patent No. 5,930,474 (the "'474 patent"), entitled "Internet Organizer for Accessing Geographically and Topically Based Information," duly and legally issued on July 29, 1999.

5. GEOTAG is the assignee of the '474 Patent and it has standing to bring this lawsuit for infringement of the '474 Patent.

6. The claims of the '474 Patent cover, *inter alia*, systems and methods which comprise associating on-line information with geographic areas, such systems and methods comprising computers, an organizer, and a search engine configured to provide a geographical

search area wherein at least one entry associated with a broader geographical area is dynamically replicated into at least one narrower geographical area, the search engine further configured to search topics within the selected geographical search area.

7. On information and belief, all Defendants named herein have infringed the '474 patent pursuant to 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent.

8. On information and belief, 7FAM has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.7forallmankind.com.

9. On information and belief, ACADEMY has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.academy.com.

10. On information and belief, AROMATIQUE has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line

information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Retail Locator at www.aromatique.com.

11. On information and belief, ASICS has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Search For A Local Retailer at www.asicsamerica.com.

12. On information and belief, AT&T MOBILITY has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the store locator at www.att.com and/or www.wireless.att.com.

13. On information and belief, AT&T SERVICES has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the store locator at www.att.com, www.connecttoatt.com and/or www.wireless.att.com.

14. On information and belief, AVON has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the

United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Find A Representative at www.avon.com.

15. On information and belief, BEST BUY has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Find A Best Buy Store at www.bestbuy.com.

16. On information and belief, BROOKSTONE has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.brookstone.com.

17. On information and belief, BROWN JORDAN has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Dealer Locator at www.brownjordan.com.

18. On information and belief, CARTIER has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Find A Boutique at www.cartier.us.

19. On information and belief, CHRISTIAN DIOR has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.dior.com, www.diorhomme.com and www.diorcouture.com.

20. On information and belief, CRAFTMASTER has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Dealer Locator and Where To Buy at www.cmfurniture.com and www.craftmasterdoors.com.

21. On information and belief, DOLLAR TREE has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474

patent. On information and belief, such systems and methods comprise the Store Locator at www.dollartree.com.

22. On information and belief, GAMESTOP has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.gamestop.com.

23. On information and belief, GANDER MOUNTAIN has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Find A Store Near You at www.gandermountain.com.

24. On information and belief, HINKLEY has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Where To Buy at www.hinkleylighting.com.

25. On information and belief, KOHL'S has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with

geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.kohls.com.

26. On information and belief, MICHAELS has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Find A Store at www.michaels.com.

27. On information and belief, NORDSTROM has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Our Stores at www.nordstrom.com.

28. On information and belief, OLD NAVY LLC has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.oldnavy.com and www.gap.oldnavy.com.

29. On information and belief, OSCAR DE LA RENTA has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or

offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.oscardelarenta.com.

30. On information and belief, PETSMART has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.petsmart.com.

31. On information and belief, ROLEX has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Dealer Locator at www.rolex.com.

32. On information and belief, SEVEN has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Dealer Locator at www.7forallmankind.com.

33. On information and belief, STERLING has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.jared.com and www.kay.com.

34. On information and belief, TARGET has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Find A Store at www.target.com.

35. On information and belief, TJ MAXX has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.tjmaxx.com.

36. On information and belief, TOYS "R" US has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator at www.toysrus.com and www.babiesrus.com.

37. On information and belief, VAN CLEEF has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Boutique Search at www.vancleef-arpels.com.

38. On information and belief, VF has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise the Store Locator and Find A Store Near You at www.7forallmankind.com, www.lucy.com, www.wrangler.com and/or www.thenorthface.com.

39. On information and belief, WRANGLER has infringed the '474 patent in violation of 35 U.S.C. § 271 through actions comprising the making, using, selling and/or offering for sale in the United States systems and methods which comprise associating on-line information with geographic areas and which are covered by one or more claims of the '474 patent. On information and belief, such systems and methods comprise Find A Store Near You at www.wrangler.com.

40. As a result of Defendants' infringing conduct, Defendants have damaged GEOTAG. Defendants are liable to GEOTAG in an amount that adequately compensates GEOTAG for their infringement, which, by law, can be no less than a reasonable royalty.

41. To the extent that facts learned during the pendency of this case show that Defendants' infringement is, or has been willful, GEOTAG reserves the right to request such a finding at time of trial.

PRAYER FOR RELIEF

WHEREFORE, GEOTAG respectfully requests that this Court enter:

1. A judgment in favor of GEOTAG that Defendants have infringed the '474 patent;
2. A permanent injunction enjoining Defendants, and their officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement, inducing the infringement of, or contributing to the infringement of the '474 patent;
3. A judgment and order requiring Defendants to pay GEOTAG its damages, costs, expenses, and prejudgment and post-judgment interest for Defendants' infringement of the '474 patent as provided under 35 U.S.C. § 284;
4. An award to GEOTAG for enhanced damages as provided under 35 U.S.C. § 284;
5. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to GEOTAG its reasonable attorneys' fees; and
6. Any and all other relief to which GEOTAG may show itself to be entitled.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, GEOTAG requests a trial by jury of any issues so triable by right.

DATED February 6, 2012.

Respectfully submitted,

By: \s\ Stevenson Moore

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**ATTORNEYS FOR PLAINTIFF
GEOTAG, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile, and/or first class mail on this 6th day of February, 2012.

\s\ Stevenson Moore

Stevenson Moore