

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

The Money Suite Company,

Plaintiff,

v.

Citigroup, Inc.,

Defendant.

Civil Action No.

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

This is an action for patent infringement in which Plaintiff The Money Suite Company (“Money Suite”) makes the following allegations against Citigroup, Inc. (“Defendant”).

PARTIES

1. Money Suite is a Delaware corporation that maintains its principal place of business at 200 W. Broadway, Suite C, Missoula, Montana 59808.

2. On information and belief, Defendant is a Delaware limited liability company with its principal office at 399 Park Avenue, New York, New York 10022. Defendant has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801 its agent for service of process.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*, including § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant because, among other reasons, Defendant is a Delaware corporation, has done business in this District, has committed acts of patent infringement in this District, and has harmed Money Suite in this District, by, among other things, using, selling, offering for sale, and importing infringing products and services in this District.

5. Venue is proper in this District under 28 U.S.C. §§ 1391(b)-(d) and 1400(b) because, among other reasons, Defendant is a Delaware corporation, is subject to personal jurisdiction in this District, and has committed acts of patent infringement in this District. On information and belief, for example, Defendant has used, sold, offered for sale, and imported infringing products in this District.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,684,189

6. Money Suite is the owner as assignee of all rights, title and interest in and under United States Patent No. 6,684,189 (“the ‘189 patent”), which duly and legally issued on January 27, 2004, with Ronald B. Ryan and Ronald G. Marquart as the named inventors, for an apparatus and method using front-end network gateways and search criteria for efficient quoting at a remote location. A copy of the ‘189 patent is attached hereto as Exhibit A.

7. Defendant has directly infringed at least claim 1 of the ‘189 patent, in this judicial district and elsewhere in the United States, by, among other things, making, using, importing, offering for sale, and/or selling financial product quotation products and services that fall within the scope of the claims of the ‘189 patent, including but not necessarily limited to financial product quotation products and services provided at the www.citibank.com website, including, for example, the mortgage quote service on that website. By making, using, importing, offering for sale, and/or selling such products and services which fall within the scope of the ‘189 patent, including but not limited to using front-end network gateways and selection criteria entered at a remote computer terminal to conduct a search of multiple financial products for efficient quoting at a remote location and all like products and services, Defendant has injured Money Suite and is thus liable for infringement of the ‘189 patent pursuant to 35 U.S.C. § 271.

8. Defendant has committed these acts of infringement without license or authorization.

9. As a result of Defendant’s infringement of the ‘189 patent, Money Suite has suffered monetary damages in an amount not yet determined, but in no event less than a

reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

10. To the extent that facts learned in discovery show that Defendant's infringement of the '189 patent has been willful, Money Suite reserves the right to request such a finding at the time of trial.

11. As a result of Defendant's infringement of the '189 patent, Money Suite has suffered monetary damages and is entitled to a money judgment in an amount adequate to compensate for Defendant's infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

12. This is an exceptional case within the meaning of 35 U.S.C. §285.

PRAYER FOR RELIEF

Money Suite respectfully requests the following relief:

- A. That the Court declare that the '189 patent is valid and enforceable and that its claims have been infringed by Defendant as described herein;
- B. That the Court award damages to Money Suite to which it is entitled for patent infringement;
- C. That the Court award interest on the damages to Money Suite;
- D. That the Court award to Money Suite its costs and attorneys' fees incurred in this action; and
- E. Such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Money Suite, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury on all issues so triable.

October 23, 2013

FARNAN LLP

/s/ Brian E. Farnan

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