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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF ARIZONA

10 Automated Transactions LLC,

No. \_\_\_\_\_

11 Plaintiff,

**COMPLAINT AND DEMAND FOR  
JURY TRIAL**

12 v.

13 Goathead Saloon – AAA ATMS,

14 Defendant.  
15

16 Plaintiff Automated Transactions LLC (“Automated Transactions”) alleges as  
17 follows:

18 **PARTIES**

19 1. Automated Transactions is a limited liability company organized and  
20 existing under the laws of the state of Delaware, having a principal place of business at  
21 2711 Centerville Road, Suite 400, Wilmington, DE 19808.

22 2. Upon information and belief, Goathead Saloon –AAA ATMS (“Goathead”)   
23 has a principal place of business located at 1423 S Country Club Drive, Mesa, Arizona  
24 85210.

25 **NATURE OF ACTION**

26 3. This is an action for patent infringement pursuant to 35 U.S.C. §101, et. seq.

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**JURISDICTION AND VENUE**

4. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§1331 and 1338.

5. Venue is proper in this judicial district under 28 U.S.C. §§1391 and 1400(b).

**FIRST CLAIM FOR RELIEF**

6. On August 18, 2009, U.S. Patent No. 7,575,158 (the “‘158 patent”) was duly and legally issued to David M. Barcelou. A true and correct copy of the ‘158 patent is attached hereto as Exhibit A.

7. By license, Automated Transactions is the exclusive licensee of the ‘158 patent with the right to sue for past and future infringement and collect damages therefore in its own name.

8. The ‘158 patent discloses and claims, among other things, integrated banking and transaction machines. Claims 1-3, 11-13 and 15 state as follows:

1. An integrated banking and transaction machine for use by a consumer to purchase access to retail ATM services, comprising:
    - an automated teller machine;
    - a user interface to the automated teller machine;
    - means for identifying the user to the automated teller machine, further comprising a smart card/magnetic stripe reader/encoder and a sensor;
    - an Internet interface to an Internet connection to the automated teller machine that uses encryption services and security services to provide the user access to the user interface and retail ATM service; and
    - access to the automated teller machine user interface whereupon the consumer may selectively dispense currency using the integrated banking and transaction machine providing the retail ATM service;
- wherein the consumer can purchase access to the retail ATM

- 1 service through use of the user interface and Internet services  
2 connections.
- 3 2. The integrated banking and transaction machine according to  
4 claim 1, further comprising means for consummating the  
5 purchase with cash.
- 6 3. The integrated banking and transaction machine according to  
7 claim 1, further comprising means for consummating the  
8 purchase with bills.
- 9 11. The integrated banking and transaction machine according to  
10 claim 1, further comprising means for consummating the  
11 purchase with a credit card.
- 12 12. The integrated banking and transaction machine according to  
13 claim 1, further comprising means for consummating the  
14 purchase with a debit card.
- 15 13. The integrated banking and transaction machine according to  
16 claim 1, further comprising means for consummating the  
17 purchase with a stored value card.
- 18 15. The integrated banking and transaction machine according to  
19 claim 1, further comprising means for consummating the  
20 purchase with an identification card

21 9. Goathead is using ATMs within this judicial district which incorporate every  
22 element of the above claims or substantial equivalents thereof. Therefore, Goathead is  
23 directly or indirectly infringing at least the above claims of the '158 patent, either literally  
24 or under the doctrine of equivalents, and is liable for infringement of the '158 patent  
25 pursuant to 35 U.S.C. §271.

26 10. Goathead also provides the above ATMs for use by customers and others  
within this judicial district, and provides those customers and others with detailed  
explanations, instructions and information as to arrangements, applications and uses of  
these ATMs that promote and demonstrate how to use these ATMs in an infringing  
manner. These acts constitute inducement to infringe the above claims of the '158 patent,  
either literally or under the doctrine of equivalents, whenever a customer uses one of the  
above ATMs to purchase access to retail ATM services through the use of the user

1 interface and Internet service connections. Goathead is therefore liable for inducing  
2 infringement of the '158 patent pursuant to 35 U.S.C. §271.

3 11. Goathead's actions in infringing the '158 patent have been, and continue to  
4 be, willful, deliberate and/or in conscious disregard to the rights of Automated  
5 Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

6 12. Goathead's infringement of the '158 patent has caused and continues to  
7 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
8 infringement of the '158 patent by Goathead will continue unless enjoined by this Court.

9 **SECOND CLAIM FOR RELIEF**

10 13. On October 6, 2009, U.S. Patent No. 7,597,248 (the "'248 patent'") was duly  
11 and legally issued to David M. Barcelou. A true and correct copy of the '248 patent is  
12 attached hereto as Exhibit B.

13 14. By license, Automated Transactions is the exclusive licensee of the '248  
14 patent with the right to sue for past and future infringement and collect damages therefore  
15 in its own name.

16 15. The '248 patent discloses and claims, among other things, integrated  
17 banking and transaction machines. Claims 1-3, 5, 11-13 and 15 state as follows:

- 18 1. An integrated banking and transaction machine for use by a  
19 consumer to purchase access to retail ATM services,  
20 comprising:  
21 an automated teller machine;  
22 a user interface to the automated teller machine;  
23 means for identifying the user to the automated teller machine,  
24 further comprising a smart card/magnetic stripe reader/encoder  
25 and a sensor;  
26 network services to financial network connections to the  
automated teller machine that uses encryption services and  
security services to provide the user access to the user  
interface and retail ATM service; and

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access to the automated teller machine user interface whereupon the consumer may selectively dispense cash using the integrated banking and transaction machine providing the retail ATM service;

wherein the consumer can purchase access to the retail ATM service through use of the user interface and financial network connections.

- 2. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with cash.
- 3. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with bills.
- 5. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with currency.
- 11. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a credit card.
- 12. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a debit card.
- 13. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a stored value card.
- 15. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with an identification card.

16. Goathead is using ATMs within this judicial district which incorporate every element of the above claims or substantial equivalents thereof. Therefore, Goathead is directly or indirectly infringing at least the above claims of the '248 patent, either literally or under the doctrine of equivalents, and is liable for infringement of the '248 patent

1 pursuant to 35 U.S.C. §271.

2 17. Goathead also provides the above ATMs for use by customers and others  
3 within this judicial district, and provides those customers and others with detailed  
4 explanations, instructions and information as to arrangements, applications and uses of  
5 these ATMs that promote and demonstrate how to use these ATMs in an infringing  
6 manner. These acts constitute inducement to infringe the above claims of the '248 patent,  
7 either literally or under the doctrine of equivalents, whenever a customer uses one of the  
8 above ATMs to purchase access to retail ATM services through the use of the user  
9 interface and financial network connections. Goathead is therefore liable for inducing  
10 infringement of the '248 patent pursuant to 35 U.S.C. §271.

11 18. Goathead's actions in infringing the '248 patent have been, and continue to  
12 be, willful, deliberate and/or in conscious disregard to the rights of Automated  
13 Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

14 19. Goathead's infringement of the '248 patent has caused and continues to  
15 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
16 infringement of the '248 patent by Goathead will continue unless enjoined by this Court.

17 **THIRD CLAIM FOR RELIEF**

18 20. On October 13, 2009, U.S. Patent No. 7,600,677 (the "'677 patent") was  
19 duly and legally issued to David M. Barcelou. A true and correct copy of the '677 patent is  
20 attached hereto as Exhibit C.

21 21. By license, Automated Transactions is the exclusive licensee of the '677  
22 patent with the right to sue for past and future infringement and collect damages therefore  
23 in its own name.

24 22. The '677 patent discloses and claims, among other things, integrated  
25 banking and transaction machines. Claims 1-3, 5, 11-13 and 15 state as follows:

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1. An integrated banking and transaction machine for use by a consumer to purchase access to retail ATM services, comprising:
  - an automated teller machine;
  - a user interface to the automated teller machine;
  - means for identifying the user to the automated teller machine, further comprising a smart card/magnetic stripe reader/encoder and a sensor;
  - an Internet interface to the World Wide Web to the automated teller machine that uses encryption services and security services to provide the user access to the user interface and retail ATM service; and
  - access to the automated teller machine user interface whereupon the consumer may selectively dispense currency using the integrated banking and transaction machine providing the retail ATM service;
  - wherein the consumer can purchase access to the retail ATM service through use of the user interface and World Wide Web connections.
2. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with cash.
3. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with bills.
5. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with currency.
11. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a credit card.
12. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a debit card.

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13. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a stored value card.

15. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with an identification card.

23. Goathead is using ATMs within this judicial district which incorporate every element of the above claims or substantial equivalents thereof. Therefore, Goathead is directly or indirectly infringing at least the above claims of the '677 patent, either literally or under the doctrine of equivalents, and is liable for infringement of the '677 patent pursuant to 35 U.S.C. §271.

24. Goathead also provides the above ATMs for use by customers and others within this judicial district, and provides those customers and others with detailed explanations, instructions and information as to arrangements, applications and uses of these ATMs that promote and demonstrate how to use these ATMs in an infringing manner. These acts constitute inducement to infringe the above claims of the '677 patent, either literally or under the doctrine of equivalents, whenever a customer uses one of the above ATMs to purchase access to retail ATM services through the use of the user interface and World Wide Web connections. Goathead is therefore liable for inducing infringement of the '677 patent pursuant to 35 U.S.C. §271.

25. Goathead's actions in infringing the '677 patent have been, and continue to be, willful, deliberate and/or in conscious disregard to the rights of Automated Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

26. Goathead's infringement of the '677 patent has caused and continues to cause irreparable harm to Automated Transactions in an amount to be proven at trial. The infringement of the '677 patent by Goathead will continue unless enjoined by this Court.



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**FOURTH CLAIM FOR RELIEF**

27. On April 20, 2010, U.S. Patent No. 7,699,220 (the “‘220 patent”) was duly and legally issued to David M. Barcelou. A true and correct copy of the ‘220 patent is attached hereto as Exhibit D.

28. By license, Automated Transactions is the exclusive licensee of the ‘220 patent with the right to sue for past and future infringement and collect damages therefore in its own name.

29. The ‘220 patent discloses and claims, among other things, integrated banking and transaction machines. Claims 1-3, 41-43, 48, 50 and 88 state as follows:

1. An automated retail terminal for use by a consumer to purchase from a banking or commercial ATM provider, cash access services, comprising:
  - an automated teller machine;
  - an Internet interface to the automated teller machine for providing the user with services for immediately realizing access to dispensable currency;
  - a user interface to the automated teller machine;
  - means for identifying the user to the automated teller machine;
  - network services to the automated teller machine that include encryption services, security services and at least one ATM network connection;
  - and means for selectively dispensing at least one form of dispensable currency using the automated teller machine video command or control touchscreen;
  - where the consumer may purchase cash access services through the use of the user interface and the ATM network connection, in combination with Intranet services, Internet services or the World Wide Web on the Internet.
2. The automated retail terminal according to claim 1, further comprising means for accepting cash, checks or removable media deposits.

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3. The automated retail terminal according to claim 1, further comprising means for check cashing by use of coins, cash or encoding devices.

41. The automated retail terminal for use by a consumer to purchase from a banking or commercial ATM provider cash access services according to claim 1, where, the consumer may consummate the purchase by means of the use of a credit card.

42. The automated retail terminal for use by a consumer to purchase from a banking or commercial ATM provider cash access services according to claim 1, where, the consumer may consummate the purchase by means of the use of a debit card.

43. The automated retail terminal for use by a consumer to purchase from a banking or commercial ATM provider cash access services according to claim 1, where, the consumer may consummate the purchase by means of the use of a stored value card.

48. The automated retail terminal for use by a consumer to purchase from a banking or commercial ATM provider cash access services according to claim 1, where, the consumer may consummate the purchase by means of the use of an identification card.

50. The automated retail terminal for use by a consumer to purchase from a banking or commercial ATM provider cash access services according to claim 1, where, the consumer may consummate the purchase by means of the use of a check cashing service.

88. Integrated banking and transaction apparatus for use by a consumer, comprising:

an automated teller machine; and

means for providing a retail transaction to the consumer through an Internet interface and an Intranet service to the automated teller machine.

30. Goathead is using ATMs within this judicial district which incorporate every

1 element of the above claims or substantial equivalents thereof. Therefore, Goathead is  
2 directly or indirectly infringing at least the above claims of the '220 patent, either literally  
3 or under the doctrine of equivalents, and is liable for infringement of the '220 patent  
4 pursuant to 35 U.S.C. §271.

5 31. Goathead also provides the above ATMs for use by customers and others  
6 within this judicial district, and provides those customers and others with detailed  
7 explanations, instructions and information as to arrangements, applications and uses of  
8 these ATMs that promote and demonstrate how to use these ATMs in an infringing  
9 manner. These acts constitute inducement to infringe the above claims of the '220 patent,  
10 either literally or under the doctrine of equivalents, whenever a customer uses one of the  
11 above ATMs to purchase access to retail ATM services through the use of the user  
12 interface and Internet service connections. Goathead is therefore liable for inducing  
13 infringement of the '220 patent pursuant to 35 U.S.C. §271.

14 32. Goathead's actions in infringing the '220 patent have been, and continue to  
15 be, willful, deliberate and/or in conscious disregard to the rights of Automated  
16 Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

17 33. Goathead's infringement of the '220 patent has caused and continues to  
18 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
19 infringement of the '220 patent by Goathead will continue unless enjoined by this Court.

20 **FIFTH CLAIM FOR RELIEF**

21 34. On August 11, 2009, U.S. Patent No. 7,571,850 (the "'850 patent'") was duly  
22 and legally issued to David M. Barcelou. A true and correct copy of the '850 patent is  
23 attached hereto as Exhibit E.

24 35. By license, Automated Transactions is the exclusive licensee of the '850  
25 patent with the right to sue for past and future infringement and collect damages therefore  
26 in its own name.

1           36. The '850 patent discloses and claims, among other things, integrated  
2 banking and transaction machines. Claims 1-3, 11-13 and 15 state as follows:

3                   1. An integrated banking and transaction machine for use by a  
4 consumer to purchase access to retail ATM services,  
comprising: an automated teller machine;

5                   a user interface to the automated teller machine; means for  
6 identifying the user to the automated teller machine, further  
comprising a smart card/magnetic stripe reader/encoder and a  
7 sensor;

8                   an Internet interface to an Intranet connection to the automated  
9 teller machine that uses encryption services and security  
services to provide the user access to the user interface and  
retail ATM service;

10                   and access to the automated teller machine user interface  
11 whereupon the consumer may selectively dispense encodable  
credit using the integrated banking and transaction machine  
12 providing the retail ATM service;

13                   wherein the consumer can purchase access to the retail ATM  
14 service through use of the user interface, Intranet and Internet  
connections.

15                   2. The integrated banking and transaction machine according to  
16 claim 1, further comprising means for consummating the  
purchase with cash.

17                   3. The integrated banking and transaction machine according to  
18 claim 1, further comprising means for consummating the  
purchase with bills.

19                   11. The integrated banking and transaction machine according to  
20 claim 1, further comprising means for consummating the  
purchase with a credit card.

21                   12. The integrated banking and transaction machine according to  
22 claim 1, further comprising means for consummating the  
purchase with a debit card.

23                   13. The integrated banking and transaction machine according to  
24 claim 1, further comprising means for consummating the  
purchase with a stored value card.

25                   15. The integrated banking and transaction machine according to  
26 claim 1, further comprising means for consummating the  
purchase with an identification card.

1 37. Goathead is using ATMs within this judicial district which incorporate every  
2 element of the above claims or substantial equivalents thereof. Therefore, Goathead is  
3 directly or indirectly infringing at least the above claims of the '850 patent, either literally  
4 or under the doctrine of equivalents, and is liable for infringement of the '850 patent  
5 pursuant to 35 U.S.C. §271.

6 38. Goathead also provides the above ATMs for use by customers and others  
7 within this judicial district, and provides those customers and others with detailed  
8 explanations, instructions and information as to arrangements, applications and uses of  
9 these ATMs that promote and demonstrate how to use these ATMs in an infringing  
10 manner. These acts constitute inducement to infringe the above claims of the '850 patent,  
11 either literally or under the doctrine of equivalents, whenever a customer uses one of the  
12 above ATMs to purchase access to retail ATM services through the use of the user  
13 interface, Intranet and Internet service connections. Goathead is therefore liable for  
14 inducing infringement of the '850 patent pursuant to 35 U.S.C. §271.

15 39. Goathead's actions in infringing the '850 patent have been, and continue to  
16 be, willful, deliberate and /or in conscious disregard to the rights of Automated  
17 Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

18 40. Goathead's infringement of the '850 patent has caused and continues to  
19 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
20 infringement of the '850 patent by Goathead will continue unless enjoined by this Court.

21 **SIXTH CLAIM FOR RELIEF**

22 41. On September 22, 2009, U.S. Patent No. 7,591,420 (the "'420 patent") was  
23 duly and legally issued to David M. Barcelou. A true and correct copy of the '420 patent is  
24 attached hereto as Exhibit F.

25 42. By license, Automated Transactions is the exclusive licensee of the '420  
26 patent with the right to sue for past and future infringement and collect damages therefore

1 in its own name.

2 43. The '420 patent discloses and claims, among other things, integrated  
3 banking and transaction machines. Claims 1-3, 11-13 and 15 state as follows:

4 1. An integrated banking and transaction machine for use by a  
5 consumer to purchase access to retail ATM services,  
6 comprising: an automated teller machine;

7 a user interface to the automated teller machine;

8 means for identifying the user to the automated teller machine,  
9 further comprising a smart card/magnetic stripe reader/encoder  
10 and a sensor;

11 an Internet interface to an Intranet connection to the automated  
12 teller machine that uses encryption services and security  
13 services to provide the user access to the user interface and  
14 retail ATM service;

15 and access to the automated teller machine user interface  
16 whereupon the consumer may selectively dispense encodable  
17 currency using the integrated banking and transaction machine  
18 providing the retail ATM service;

19 wherein the consumer can purchase access to the retail ATM  
20 service through use of the user interface, Intranet and Internet  
21 connections.

22 2. The integrated banking and transaction machine according to  
23 claim 1, further comprising means for consummating the  
24 purchase with cash.

25 3. The integrated banking and transaction machine according to  
26 claim 1, further comprising means for consummating the  
purchase with bills.

11. The integrated banking and transaction machine according to  
claim 1, further comprising means for consummating the  
purchase with a credit card.

12. The integrated banking and transaction machine according to  
claim 1, further comprising means for consummating the  
purchase with a debit card.

13. The integrated banking and transaction machine according to  
claim 1, further comprising means for consummating the  
purchase with a stored value card.

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15. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with an identification card.

44. Goathead is using ATMs within this judicial district which incorporate every element of the above claims or substantial equivalents thereof. Therefore, Goathead is directly or indirectly infringing at least the above claims of the '420 patent, either literally or under the doctrine of equivalents, and is liable for infringement of the '420 patent pursuant to 35 U.S.C. §271.

45. Goathead also provides the above ATMs for use by customers and others within this judicial district, and provides those customers and others with detailed explanations, instructions and information as to arrangements, applications and uses of these ATMs that promote and demonstrate how to use these ATMs in an infringing manner. These acts constitute inducement to infringe the above claims of the '420 patent, either literally or under the doctrine of equivalents, whenever a customer uses one of the above ATMs to purchase access to retail ATM services through the use of the user interface, Intranet and Internet service connections. Goathead is therefore liable for inducing infringement of the '420 patent pursuant to 35 U.S.C. §271.

46. Goathead's actions in infringing the '420 patent have been, and continue to be, willful, deliberate and/or in conscious disregard to the rights of Automated Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

47. Goathead's infringement of the '420 patent has caused and continues to cause irreparable harm to Automated Transactions in an amount to be proven at trial. The infringement of the '420 patent by Goathead will continue unless enjoined by this Court.

**SEVENTH CLAIM FOR RELIEF**

48. On October 6, 2009, U.S. Patent No. 7,597,251 (the "'251 patent'") was duly and legally issued to David M. Barcelou. A true and correct copy of the '251 patent is attached hereto as Exhibit G.

1           49. By license, Automated Transactions is the exclusive licensee of the '251  
2 patent with the right to sue for past and future infringement and collect damages therefore  
3 in its own name.

4           50. The '251 patent discloses and claims, among other things, integrated  
5 banking and transaction machines. Claims 1-3, 11-13 and 15 state as follows:

- 6                   1. An integrated banking and transaction machine for use by a  
7                   consumer to purchase access to retail ATM services,  
8                   comprising: an automated teller machine;  
9                   a user interface to the automated teller machine;  
10                   means for identifying the user to the automated teller machine,  
11                   further comprising a smart card/magnetic stripe reader/encoder  
12                   and a sensor;  
13                   network services to wireless network connections to the  
14                   automated teller machine that use encryption services and  
15                   security services to provide the user access to the user  
16                   interface and retail ATM service;  
17                   and access to the automated teller machine user interface  
18                   whereupon the consumer may selectively dispense cash using  
19                   the integrated banking and transaction machine providing the  
20                   retail ATM service;  
21                   wherein the consumer can purchase access to the retail ATM  
22                   service through use of the user interface and wireless network  
23                   connections.  
24                   2. The integrated banking and transaction machine according to  
25                   claim 1, further comprising means for consummating the  
26                   purchase with cash.  
27                   3. The integrated banking and transaction machine according to  
28                   claim 1, further comprising means for consummating the  
29                   purchase with bills.  
30                   11. The integrated banking and transaction machine according to  
31                   claim 1, further comprising means for consummating the  
32                   purchase with a credit card.  
33                   12. The integrated banking and transaction machine according to  
34                   claim 1, further comprising means for consummating the



1 purchase with a debit card.

2 13. The integrated banking and transaction machine according to  
3 claim 1, further comprising means for consummating the  
purchase with a stored value card.

4 15 The integrated banking and transaction machine according to  
5 claim 1, further comprising means for consummating the  
purchase with an identification card.

6 51. Goathead is using ATMs within this judicial district which incorporate every  
7 element of the above claims or substantial equivalents thereof. Therefore, Goathead is  
8 directly or indirectly infringing at least the above claims of the '251 patent, either literally  
9 or under the doctrine of equivalents, and is liable for infringement of the '251 patent  
10 pursuant to 35 U.S.C. §271.

11 52. Goathead also provides the above ATMs for use by customers and others  
12 within this judicial district, and provides those customers and others with detailed  
13 explanations, instructions and information as to arrangements, applications and uses of  
14 these ATMs that promote and demonstrate how to use these ATMs in an infringing  
15 manner. These acts constitute inducement to infringe the above claims of the '251 patent,  
16 either literally or under the doctrine of equivalents, whenever a customer uses one of the  
17 above ATMs to purchase access to retail ATM services through the use of the user  
18 interface and wireless network connections. Goathead is therefore liable for inducing  
19 infringement of the '251 patent pursuant to 35 U.S.C. §271.

20 53. Goathead's actions in infringing the '251 patent have been, and continue to  
21 be, willful, deliberate and/or in conscious disregard to the rights of Automated  
22 Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

23 54. Goathead's infringement of the '251 patent has caused and continues to  
24 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
25 infringement of the '251 patent by Goathead will continue unless enjoined by this Court.

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**EIGHTH CLAIM FOR RELIEF**

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2 55. On November 17, 2009, U.S. Patent No. 7,617,973 (the “‘973 patent”) was  
3 duly and legally issued to David M. Barcelou. A true and correct copy of the ‘973 patent is  
4 attached hereto as Exhibit H.

5 56. By license, Automated Transactions is the exclusive licensee of the ‘973  
6 patent with the right to sue for past and future infringement and collect damages therefore  
7 in its own name.

8 57. The ‘973 patent discloses and claims, among other things, integrated  
9 banking and transaction machines. Claims 1-3, 11-13 and 15 state as follows:

- 10 1. An integrated banking and transaction machine for use by a  
11 consumer to purchase access to retail ATM services,  
12 comprising: an automated teller machine;  
13 a user interface to the automated teller machine;  
14 means for identifying the user to the automated teller machine,  
15 further comprising a smart card/magnetic stripe reader/encoder  
16 and a sensor;  
17 network services to Intranet services connections to the  
18 automated teller machine that use encryption services and  
19 security services to provide the user access to the user  
20 interface and retail ATM service;  
21 and access to the automated teller machine user interface  
22 whereupon the consumer may selectively dispense currency  
23 using the integrated banking and transaction machine  
24 providing the retail ATM service;  
25 wherein the consumer can purchase access to the retail ATM  
26 service through use of the user interface and Intranet services  
connections.  
2. The integrated banking and transaction machine according to  
claim 1, further comprising means for consummating the  
purchase with cash.  
3. The integrated banking and transaction machine according to  
claim 1, further comprising means for consummating the  
purchase with bills.

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- 11. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a credit card.
- 12. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a debit card.
- 13. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a stored value card.
- 15. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with an identification card.

58. Goathead is using ATMs within this judicial district which incorporate every element of the above claims or substantial equivalents thereof. Therefore, Goathead is directly or indirectly infringing at least the above claims of the '973 patent, either literally or under the doctrine of equivalents, and is liable for infringement of the '973 patent pursuant to 35 U.S.C. §271.

59. Goathead also provides the above ATMs for use by customers and others within this judicial district, and provides those customers and others with detailed explanations, instructions and information as to arrangements, applications and uses of these ATMs that promote and demonstrate how to use these ATMs in an infringing manner. These acts constitute inducement to infringe the above claims of the '973 patent, either literally or under the doctrine of equivalents, whenever a customer uses one of the above ATMs to purchase access to retail ATM services through the use of network services. Goathead is therefore liable for inducing infringement of the '973 patent pursuant to 35 U.S.C. §271.

60. Goathead's actions in infringing the '973 patent have been, and continue to be, willful, deliberate and/or in conscious disregard to the rights of Automated Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

1           61.     Goathead's infringement of the '973 patent has caused and continues to  
2 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
3 infringement of the '973 patent by Goathead will continue unless enjoined by this Court.

4   **NINTH CLAIM FOR RELIEF**

5           62.     On November 24, 2009, U.S. Patent No. 7,621,444 (the "'444 patent'") was  
6 duly and legally issued to David M. Barcelou. A true and correct copy of the '444 patent is  
7 attached hereto as Exhibit I.

8           63.     By license, Automated Transactions is the exclusive licensee of the '444  
9 patent with the right to sue for past and future infringement and collect damages therefore  
10 in its own name.

11           64.     The '444 patent discloses and claims, among other things, integrated  
12 banking and transaction machines. Claims 1-3, 11-13 and 15 state as follows:

- 13                                 1. An integrated banking and transaction machine for use by a  
14 consumer to purchase access to retail ATM services,  
15 comprising: an automated teller machine;  
16 a user interface to the automated teller machine;  
17 and means for identifying the user to the automated teller  
18 machine, further comprising a smart card/magnetic stripe  
19 reader/encoder and a sensor;  
20 network services to banking network connections to the  
21 automated teller machine that use encryption services and  
22 security services to provide the user access to the user  
23 interface and retail ATM service;  
24 and access to the automated teller machine user interface  
25 whereupon the consumer may selectively dispense cash using  
26 the integrated banking and transaction machine providing the  
retail ATM service;  
wherein the consumer can purchase access to the retail ATM  
service through use of the user interface and banking network  
connections.
2. The integrated banking and transaction machine according to  
claim 1, further comprising means for consummating the  
purchase with cash.

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- 3. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with bills.
- 11. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a credit card.
- 12. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a debit card.
- 13. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a stored value card.
- 15. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with an identification card.

65. Goathead is using ATMs within this judicial district which incorporate every element of the above claims or substantial equivalents thereof. Therefore, Goathead is directly or indirectly infringing at least the above claims of the '444 patent, either literally or under the doctrine of equivalents, and is liable for infringement of the '444 patent pursuant to 35 U.S.C. §271.

66. Goathead also provides the above ATMs for use by customers and others within this judicial district, and provides those customers and others with detailed explanations, instructions and information as to arrangements, applications and uses of these ATMs that promote and demonstrate how to use these ATMs in an infringing manner. These acts constitute inducement to infringe the above claims of the '444 patent, either literally or under the doctrine of equivalents, whenever a customer uses one of the above ATMs to purchase access to retail ATM services through the use of network services. Goathead is therefore liable for inducing infringement of the '444 patent pursuant to 35 U.S.C. §271.

67. Goathead's actions in infringing the '444 patent have been, and continue to

1 be, willful, deliberate and/or in conscious disregard to the rights of Automated  
2 Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

3 68. Goathead's infringement of the '444 patent has caused and continues to  
4 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
5 infringement of the '444 patent by Goathead will continue unless enjoined by this Court.

6 **TENTH CLAIM FOR RELIEF**

7 69. On September 14, 2010, U.S. Patent No. 7,793,830 (the "'830 patent") was  
8 duly and legally issued to David M. Barcelou. A true and correct copy of the '830 patent is  
9 attached hereto as Exhibit J.

10 70. By license, Automated Transactions is the exclusive licensee of the '830  
11 patent with the right to sue for past and future infringement and collect damages therefore  
12 in its own name.

13 71. The '830 patent discloses and claims, among other things, integrated  
14 banking and transaction machines. Claims 1-3, 11-13 and 15 state as follows:

- 15 1. An integrated banking and transaction machine for use by a  
16 consumer to purchase access to retail ATM services,  
17 comprising: an automated teller machine;  
18 a user interface to the automated teller machine;  
19 means for identifying the user to the automated teller machine,  
20 further comprising a smart card/magnetic stripe reader/encoder  
21 and a sensor;  
22 an Internet interface to the automated teller machine that uses  
23 encryption services and security services to provide the user  
24 access to the user interface and retail ATM service;  
25 and access to the automated teller machine user interface  
26 whereupon the consumer may selectively dispense currency  
using the integrated banking and transaction machine  
providing the retail ATM service;  
wherein the consumer can purchase access to the retail ATM  
service through use of the user interface and the Internet  
interface.

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- 2 The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with cash.
- 3. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with bills.
- 11. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a credit card.
- 12. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a debit card.
- 13. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a stored value card.
- 15. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with an identification card.

72. Goathead is using ATMs within this judicial district which incorporate every element of the above claims or substantial equivalents thereof. Therefore, Goathead is directly or indirectly infringing at least the above claims of the '830 patent, either literally or under the doctrine of equivalents, and is liable for infringement of the '830 patent pursuant to 35 U.S.C. §271.

73. Goathead also provides the above ATMs for use by customers and others within this judicial district, and provides those customers and others with detailed explanations, instructions and information as to arrangements, applications and uses of these ATMs that promote and demonstrate how to use these ATMs in an infringing manner. These acts constitute inducement to infringe the above claims of the '830 patent, either literally or under the doctrine of equivalents, whenever a customer uses one of the above ATMs to purchase access to retail ATM services through the use of the user interface and Internet service connections. Goathead is therefore liable for inducing infringement of the '830 patent pursuant to 35 U.S.C. §271.

1           74.   Goathead’s actions in infringing the ‘830 patent have been, and continue to  
2 be, willful, deliberate and/or in conscious disregard to the rights of Automated  
3 Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

4           75.   Goathead’s infringement of the ‘830 patent has caused and continues to  
5 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
6 infringement of the ‘830 patent by Goathead will continue unless enjoined by this Court.

7                                   **ELEVENTH CLAIM FOR RELIEF**

8           76.   On September 28, 2010, U.S. Patent No. 7,802,718 (the “‘718 patent”) was  
9 duly and legally issued to David M. Barcelou. A true and correct copy of the ‘718 patent is  
10 attached hereto as Exhibit K.

11           77.   By license, Automated Transactions is the exclusive licensee of the ‘718  
12 patent with the right to sue for past and future infringement and collect damages therefore  
13 in its own name.

14           78.   The ‘718 patent discloses and claims, among other things, integrated  
15 banking and transaction machines. Claims 1-3, 11-13 and 15 state as follows:

- 16                   1. An integrated banking and transaction machine for use by a  
17                    consumer to purchase access to retail automated teller machine  
18                    services, comprising: an automated teller machine;  
19                    a user interface to the automated teller machine;  
20                    an identification device for identifying the user to the  
21                    automated teller machine, further comprising a smart  
22                    card/magnetic stripe reader/encoder and a sensor;  
23                    an Internet interface to an Intranet connection to the automated  
24                    teller machine that uses encryption services and security  
25                    services to provide the user access to the user interface and  
26                    retail automated teller machine service;  
                    and access to the automated teller machine user interface  
                    whereupon the consumer may selectively dispense bills and/or  
                    coins using the integrated banking and transaction machine  
                    providing the retail automated teller machine service;



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wherein the consumer can purchase access to the retail automated teller machine service through use of the user interface, Intranet and Internet connections.

2. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with cash.
3. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with bills.
11. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a credit card.
12. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a debit card.
13. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with a stored value card.
15. The integrated banking and transaction machine according to claim 1, further comprising means for consummating the purchase with an identification card.

79. Goathead is using ATMs within this judicial district which incorporate every element of the above claims or substantial equivalents thereof. Therefore, Goathead is directly or indirectly infringing at least the above claims of the '718 patent, either literally or under the doctrine of equivalents, and is liable for infringement of the '718 patent pursuant to 35 U.S.C. §271.

80. Goathead also provides the above ATMs for use by customers and others within this judicial district, and provides those customers and others with detailed explanations, instructions and information as to arrangements, applications and uses of these ATMs that promote and demonstrate how to use these ATMs in an infringing manner. These acts constitute inducement to infringe the above claims of the '718 patent, either literally or under the doctrine of equivalents, whenever a customer uses one of the

1 above ATMs to purchase access to retail ATM services through the use of the user  
2 interface, Intranet and Internet service connections. Goathead is therefore liable for  
3 inducing infringement of the '718 patent pursuant to 35 U.S.C. §271.

4 81. Goathead's actions in infringing the '718 patent have been, and continue to  
5 be, willful, deliberate and/or in conscious disregard to the rights of Automated  
6 Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

7 82. Goathead's infringement of the '718 patent has caused and continues to  
8 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
9 infringement of the '718 patent by Goathead will continue unless enjoined by this Court.

10 **TWELFTH CLAIM FOR RELIEF**

11 83. On November 23, 2010, U.S. Patent No. 7,837,101 (the "'101 patent'") was  
12 duly and legally issued to David M. Barcelou. A true and correct copy of the '101 patent is  
13 attached hereto as Exhibit L.

14 84. By license, Automated Transactions is the exclusive licensee of the '101  
15 patent with the right to sue for past and future infringement and collect damages therefore  
16 in its own name.

17 85. The '101 patent discloses and claims, among other things, integrated  
18 banking and transaction machines. Claims 1-3, 11-13 and 15 state as follows:

- 19 1. An integrated banking and transaction machine for use by a  
20 consumer to purchase access to retail automated teller machine  
21 services, comprising: an automated teller machine;  
22 a user interface to the automated teller machine;  
23 means for identifying the user to the automated teller machine,  
24 further comprising a smart card/magnetic stripe reader/encoder  
25 and a sensor;  
26 network services to satellite network connections to the  
automated teller machine that use encryption services and  
security services to provide the user access to the user  
interface and retail ATM service;

1 and access to the automated teller machine user interface  
2 whereupon the consumer may selectively dispense cash using  
3 the integrated banking and transaction machine providing the  
4 retail ATM service;

5 wherein the consumer can purchase access to the retail  
6 automated teller machine service through use of the user  
7 interface and satellite network connections.

8 2. The integrated banking and transaction machine according to  
9 claim 1, further comprising means for consummating the  
10 purchase with cash.

11 3. The integrated banking and transaction machine according to  
12 claim 1, further comprising means for consummating the  
13 purchase with bills.

14 11. The integrated banking and transaction machine according to  
15 claim 1, further comprising means for consummating the  
16 purchase with a credit card.

17 12. The integrated banking and transaction machine according to  
18 claim 1, further comprising means for consummating the  
19 purchase with a debit card.

20 13. The integrated banking and transaction machine according to  
21 claim 1, further comprising means for consummating the  
22 purchase with a stored value card.

23 15. The integrated banking and transaction machine according to  
24 claim 1, further comprising means for consummating the  
25 purchase with an identification card.

26 86. Goathead is using ATMs within this judicial district which incorporate every  
element of the above claims or substantial equivalents thereof. Therefore, Goathead is  
directly or indirectly infringing at least the above claims of the '101 patent, either literally  
or under the doctrine of equivalents, and is liable for infringement of the '101 patent  
pursuant to 35 U.S.C. §271.

87. Goathead also provides the above ATMs for use by customers and others  
within this judicial district, and provides those customers and others with detailed  
explanations, instructions and information as to arrangements, applications and uses of  
these ATMs that promote and demonstrate how to use these ATMs in an infringing

1 manner. These acts constitute inducement to infringe the above claims of the '101 patent,  
2 either literally or under the doctrine of equivalents, whenever a customer uses one of the  
3 above ATMs to purchase access to retail ATM services through the use of network  
4 services. Goathead is therefore liable for inducing infringement of the '101 patent  
5 pursuant to 35 U.S.C. §271.

6 88. Goathead's actions in infringing the '101 patent have been, and continue to  
7 be, willful, deliberate and/or in conscious disregard to the rights of Automated  
8 Transactions, making this an exceptional case within the meaning of 35 U.S.C. §285.

9 89. Goathead's infringement of the '101 patent has caused and continues to  
10 cause irreparable harm to Automated Transactions in an amount to be proven at trial. The  
11 infringement of the '101 patent by Goathead will continue unless enjoined by this Court.

12 **PRAYER FOR RELIEF**

13 **WHEREFORE**, Automated Transactions prays for judgment against Goathead as  
14 follows:

- 15 1) Declaring Goathead has infringed United States Patent No. 7,575,158;
- 16 2) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries  
17 and employees, and those in privity or in active concert with tem, from  
18 further activities that constitute infringement, contributory infringement  
19 and/or inducing infringement of United States Patent No. 7,575,158;
- 20 3) Awarding lost profits or a reasonable royalty and other damages arising from  
21 Goathead's infringement of United States Patent No. 7,575,158 including  
22 treble damages, to Automated Transactions, together with prejudgment and  
23 post-judgment interest, in an amount according to proof;
- 24 4) This case be declared an "exceptional case" within the meaning of 35 U.S.C.  
25 §285 and awarding treble damages and reasonable attorneys' fees to  
26 Automated Transactions;

- 1 5) Declaring Goathead has infringed United States Patent No. 7,597,248;
- 2 6) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries
- 3 and employees, and those in privity or in active concert with them, from
- 4 further activities that constitute infringement, contributory infringement
- 5 and/or inducing infringement of United States Patent No. 7,597,248.
- 6 7) Awarding lost profits or a reasonable royalty and other damages arising from
- 7 Goathead's infringement of United States Patent No. 7,597,248 including
- 8 treble damages, to Automated Transactions, together with prejudgment and
- 9 post-judgment interest, in an amount according to proof;
- 10 8) This case be declared an "exceptional case" within the meaning of 35 U.S.C.
- 11 §285 and awarding treble damages and reasonable attorneys' fees to
- 12 Automated Transactions;
- 13 9) Declaring Goathead has infringed United States Patent No. 7,600,677;
- 14 10) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries
- 15 and employees, and those in privity or in active concert with them, from
- 16 further activities that constitute infringement, contributory infringement
- 17 and/or inducing infringement of United States Patent No. 7,600,677.
- 18 11) Awarding lost profits or a reasonable royalty and other damages arising from
- 19 Goathead's infringement of United States Patent No. 7,600,677 including
- 20 treble damages, to Automated Transactions, together with prejudgment and
- 21 post-judgment interest, in an amount according to proof;
- 22 12) This case be declared an "exceptional case" within the meaning of 35 U.S.C.
- 23 §285 and awarding treble damages and reasonable attorneys' fees to
- 24 Automated Transactions;
- 25 13) Declaring Goathead has infringed United States Patent No. 7,699,220;
- 26 14) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries

- 1 and employees, and those in privity or in active concert with them, from  
2 further activities that constitute infringement, contributory infringement  
3 and/or inducing infringement of United States Patent No. 7,699,220.
- 4 15) Awarding lost profits or a reasonable royalty and other damages arising from  
5 Goathead's infringement of United States Patent No. 7,699,220 including  
6 treble damages, to Automated Transactions, together with prejudgment and  
7 post-judgment interest, in an amount according to proof;
- 8 16) This case be declared an "exceptional case" within the meaning of 35 U.S.C.  
9 §285 and awarding treble damages and reasonable attorneys' fees to  
10 Automated Transactions.
- 11 17) Declaring Goathead has infringed United States Patent No. 7,571,850;
- 12 18) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries  
13 and employees, and those in privity or in active concert with them, from  
14 further activities that constitute infringement, contributory infringement  
15 and/or inducing infringement of United States Patent No. 7,571,850.
- 16 19) Awarding lost profits or a reasonable royalty and other damages arising from  
17 Goathead's infringement of United States Patent No. 7,571,850 including  
18 treble damages, to Automated Transactions, together with prejudgment and  
19 post-judgment interest, in an amount according to proof;
- 20 20) This case be declared an "exceptional case" within the meaning of 35 U.S.C.  
21 §285 and awarding treble damages and reasonable attorneys' fees to  
22 Automated Transactions.
- 23 21) Declaring Goathead has infringed United States Patent No. 7,591,420;
- 24 22) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries  
25 and employees, and those in privity or in active concert with them, from  
26 further activities that constitute infringement, contributory infringement

- 1 and/or inducing infringement of United States Patent No. 7,591,420.
- 2 23) Awarding lost profits or a reasonable royalty and other damages arising from
- 3 Goathead's infringement of United States Patent No. 7,591,420 including
- 4 treble damages, to Automated Transactions, together with prejudgment and
- 5 post-judgment interest, in an amount according to proof;
- 6 24) This case be declared an "exceptional case" within the meaning of 35 U.S.C.
- 7 §285 and awarding treble damages and reasonable attorneys' fees to
- 8 Automated Transactions.
- 9 25) Declaring Goathead has infringed United States Patent No. 7,597,251;
- 10 26) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries
- 11 and employees, and those in privity or in active concert with them, from
- 12 further activities that constitute infringement, contributory infringement
- 13 and/or inducing infringement of United States Patent No. 7,597,251.
- 14 27) Awarding lost profits or a reasonable royalty and other damages arising from
- 15 Goathead's infringement of United States Patent No. 7,597,251 including
- 16 treble damages, to Automated Transactions, together with prejudgment and
- 17 post-judgment interest, in an amount according to proof;
- 18 28) This case be declared an "exceptional case" within the meaning of 35 U.S.C.
- 19 §285 and awarding treble damages and reasonable attorneys' fees to
- 20 Automated Transactions.
- 21 29) Declaring Goathead has infringed United States Patent No. 7,617,973;
- 22 30) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries
- 23 and employees, and those in privity or in active concert with them, from
- 24 further activities that constitute infringement, contributory infringement
- 25 and/or inducing infringement of United States Patent No. 7,617,973.
- 26 31) Awarding lost profits or a reasonable royalty and other damages arising from

1 Goathead's infringement of United States Patent No. 7,617,973 including  
2 treble damages, to Automated Transactions, together with prejudgment and  
3 post-judgment interest, in an amount according to proof;

4 32) This case be declared an "exceptional case" within the meaning of 35 U.S.C.  
5 §285 and awarding treble damages and reasonable attorneys' fees to  
6 Automated Transactions.

7 33) Declaring Goathead has infringed United States Patent No. 7,621,444;

8 34) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries  
9 and employees, and those in privity or in active concert with them, from  
10 further activities that constitute infringement, contributory infringement  
11 and/or inducing infringement of United States Patent No. 7,621,444.

12 35) Awarding lost profits or a reasonable royalty and other damages arising from  
13 Goathead's infringement of United States Patent No. 7,621,444 including  
14 treble damages, to Automated Transactions, together with prejudgment and  
15 post-judgment interest, in an amount according to proof;

16 36) This case be declared an "exceptional case" within the meaning of 35 U.S.C.  
17 §285 and awarding treble damages and reasonable attorneys' fees to  
18 Automated Transactions.

19 37) Declaring Goathead has infringed United States Patent No. 7,793,830;

20 38) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries  
21 and employees, and those in privity or in active concert with them, from  
22 further activities that constitute infringement, contributory infringement  
23 and/or inducing infringement of United States Patent No. 7,793,830.

24 39) Awarding lost profits or a reasonable royalty and other damages arising from  
25 Goathead's infringement of United States Patent No. 7,793,830 including  
26 treble damages, to Automated Transactions, together with prejudgment and



- 1 post-judgment interest, in an amount according to proof;
- 2 40) This case be declared an “exceptional case” within the meaning of 35 U.S.C.
- 3 §285 and awarding treble damages and reasonable attorneys’ fees to
- 4 Automated Transactions.
- 5 41) Declaring Goathead has infringed United States Patent No. 7,802,718;
- 6 42) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries
- 7 and employees, and those in privity or in active concert with them, from
- 8 further activities that constitute infringement, contributory infringement
- 9 and/or inducing infringement of United States Patent No. 7,802,718.
- 10 43) Awarding lost profits or a reasonable royalty and other damages arising from
- 11 Goathead’s infringement of United States Patent No. 7,802,718 including
- 12 treble damages, to Automated Transactions, together with prejudgment and
- 13 post-judgment interest, in an amount according to proof;
- 14 44) This case be declared an “exceptional case” within the meaning of 35 U.S.C.
- 15 §285 and awarding treble damages and reasonable attorneys’ fees to
- 16 Automated Transactions.
- 17 45) Declaring Goathead has infringed United States Patent No. 7,837,101;
- 18 46) Permanently enjoining Goathead, its officers, directors, agents, subsidiaries
- 19 and employees, and those in privity or in active concert with them, from
- 20 further activities that constitute infringement, contributory infringement
- 21 and/or inducing infringement of United States Patent No. 7,837,101.
- 22 47) Awarding lost profits or a reasonable royalty and other damages arising from
- 23 Goathead’s infringement of United States Patent No. 7,837,101 including
- 24 treble damages, to Automated Transactions, together with prejudgment and
- 25 post-judgment interest, in an amount according to proof;
- 26 48) This case be declared an “exceptional case” within the meaning of 35 U.S.C.

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§285 and awarding treble damages and reasonable attorneys' fees to Automated Transactions.

49) Awarding Automated Transactions such other and further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff requests a trial by jury of all issues.

DATED this 22th day of April, 2013.

FENNEMORE CRAIG, P.C.

*Bys/s/Ray K. Harris*

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