IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

EFFECTIVE EXPLORATION, LLC,

          Plaintiff,

          v.

MUREX PETROLEUM CORP.

          Defendants.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Effective Exploration, LLC ("Effective Exploration"), by way of Complaint against Murex Petroleum Corp. ("Murex" or "Defendant"), alleges the following:

NATURE OF THE ACTION

1.   This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 of the United States Code.

THE PARTIES

2.   Plaintiff Effective Exploration is a limited liability company organized under the laws of the State of Texas with a place of business at 8117 Preston Road, Suite 300, Dallas, Texas 75225.

3.   On information and belief, Defendant is a corporation organized under the laws of the State of Delaware with its principal place of business at 363 N. Sam Houston Parkway E., Suite 200, Houston, Texas 77060 and a registered agent for service at Corporate Agents, Inc., 2711 Centerville Road, Suite 400, Wilmington, Delaware 19801.

JURISDICTION AND VENUE

4.   This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.

5.   This Court has personal jurisdiction over Defendant at least because Defendant has ongoing and systematic contacts with this District and the United States. Specifically, Defendant is a corporation organized under the laws of Delaware, has a registered agent for service of process in Delaware, and has thereby availed itself of the privileges and the protections of the laws of the State of Delaware and this Judicial District.

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

COUNT I

INFRINGEMENT OF U.S. PATENT NOs. 8,376,039 and 8,505,620

7.   Plaintiff repeats and re-alleges the allegations of paragraphs 1 through 6 as though fully set forth herein.

8.   On February 19, 2013, United States Patent No. 8,376,039 ("the '039 Patent"), entitled "METHOD AND SYSTEM FOR ACCESSING SUBTERRANEAN DEPOSITS FROM THE SURFACE AND TOOLS THEREFOR," was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '039 Patent is attached as Exhibit A to this Complaint.

9.   On August 13, 2013, United States Patent No. 8,505,620 ("the '620 Patent" or collectively with the '039 Patent the "Effective Exploration Patents") entitled "METHOD AND SYSTEM FOR ACCESSING SUBTERRANEAN DEPOSITS FROM THE SURFACE AND TOOLS THEREFOR," was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '620 Patent is attached as Exhibit B to this Complaint.

10.   Effective Exploration is the assignee and owner of all rights, titles and interests in and to the Effective Exploration Patents, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

11.   The Effective Exploration Patents are part of a larger portfolio that Effective Exploration is the assignee and owner of the right, title and interest in and to, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them. The portfolio includes fifty-two (52) U.S. patents. There is also at least one continuation patent application pending in the United States. The Effective Exploration Patents and the larger portfolio were previously owned by CDX LLC. In 2007, the Wall Street Journal's "Patent Scorecard" ranked CDX LLC's patent portfolio, which is now owned by Effective Exploration, as the eighth strongest portfolio in the energy and environmental industries, ahead of Chevron, General Electric, BP, and ConocoPhilips among others.

12.   Defendant has been directly infringing and continues to directly infringe one or more claims of each of the Effective Exploration Patents in the United States through at least its operation of oil and gas wells throughout the United States in violation of 35 U.S.C. § 271 (a), including, but not limited, to the following wells (identified by API number): 3310501536, 3310501552, 3306100604, 3310501547, 3310501558, 3310501635.

13.   Defendant was made aware of the Effective Exploration Patents and its infringement thereof at least as early as the filing of this Complaint.

14.   Because of Defendant's infringement of the Effective Exploration Patents, Plaintiff has suffered damages and will continue to suffer damages in the future. Plaintiff is entitled to an award of such damages, but in no event less than a reasonable royalty, the precise amount to be determined at trial.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Effective Exploration, LLC respectfully demands entry of judgment against Defendant as follows:

A.   finding that Defendant has infringed one or more claims of the Effective Exploration Patents;

B.   awarding Plaintiff damages to be paid by Defendant adequate to compensate Plaintiff for Defendant's past infringement of the Effective Exploration Patents and any continuing or future infringement of the Effective Exploration Patents through the date such judgment is entered, together with pre-judgment and post-judgment interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial as justified under 35 U.S.C. § 284;

C.   a declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Plaintiff's reasonable attorneys' fees;

D.   ordering an accounting of all infringing acts including, but not limited to, those acts not presented at trial and an award of damages to Plaintiff for any such acts; and

E.   awarding such other and further relief at law or in equity as the Court deems just and proper.

Dated: February 21, 2014   */s/ Timothy Devlin*
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