

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

QUEST LICENSING CORPORATION

Plaintiff,

v.

SUNGARD DATA SYSTEMS,  
INC.

Defendant.

Civil Action No.

**Jury Trial Demanded**

**COMPLAINT**

Plaintiff Quest Licensing Corporation (“Quest” or “Plaintiff”) hereby alleges patent infringement of U.S. Patent No. 7,194,468 (the “468 patent”) against SunGard Data Systems, Inc. (“SunGard”), as follows:

**PARTIES**

1. Plaintiff Quest Licensing Corporation is a Delaware corporation with a principal place of business at 19 Fortune Lane, Jericho, New York 11753.
2. Defendant SunGard Data Systems, Inc. is a Delaware corporation with its principal place of business at 680 East Swedesford Road, Wayne, Pennsylvania, 19087 and has appointed The Corporation Trust Company as its registered agent for service of process.

**JURISDICTION AND VENUE**

3. This action arises under the Patent Laws of the United States, including 35 U.S.C. § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).
4. On information and belief, SunGard regularly transacts business in the District of Delaware.

5. SunGard has previously admitted that it transacts business in the District of Delaware.

6. SunGard has previously admitted it is subject to personal jurisdiction in this court and that the District of Delaware is a proper venue in litigation against it under 28 U.S.C. §§ 1391(b)-(c) and 1400(b).

7. SunGard is therefore subject to this Court's specific and general personal jurisdiction.

8. Venue is proper pursuant to 28 U.S.C. §§ 1391(b)-(c) and 1400(b).

### **THE '468 PATENT**

9. Quest is the owner of all rights by assignment of the '468 patent, entitled "Apparatus and a Method for Supplying Information," with the right to pursue claims for infringement.

10. The United States Patent and Trademark office issued the '468 patent on March 20, 2007.

A true and correct copy of the '468 patent is attached to this Complaint as Exhibit A.

### **CLAIM FOR RELIEF**

#### **COUNT I**

11. Plaintiff repeats and incorporates by reference paragraphs 1-10 above.

12. SunGard has infringed and continues to directly infringe the claims of the '468 patent, literally or under the doctrine of equivalents, by making, using, selling, and offering for sale products that are covered by claims of the '468 patent, including its MarketMap Mobile system and related hardware and software that provide mobile access to real-time financial data.

13. SunGard's infringement of the '468 patent has damaged Plaintiff.

14. To the extent that facts uncovered in discovery show that SunGard's past infringement has been willful, Plaintiff reserves the right to seek enhanced damages and attorney fees for such past infringement.

WHEREFORE, Plaintiff requests that this Court:

- (a) enter judgment in favor of Plaintiff that SunGard has infringed and continues to infringe the '468 patent;
- (b) award Plaintiff all monetary relief available under the patent laws of the United States, including an award to plaintiff of the costs of this action; and
- (c) grant Plaintiff such other and further relief as this Court deems just and proper.

**DEMAND FOR A JURY TRIAL**

Plaintiff demands a trial by jury on all issues so triable.

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