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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEEP WEB, LLC)	
)	
Plaintiff,)	
)	Case No. 14-cv-00664
v.)	
)	COMPLAINT FOR
IAC SEARCH & MEDIA, INC. d/b/a)	PATENT INFRINGEMENT
ASK.COM)	
)	
Defendant.)	JURY TRIAL DEMANDED

For its Complaint, Plaintiff Deep Web, LLC ("Deep Web"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Deep Web is a Washington corporation with a place of business at 15327 184th Place NE, Woodinville, Washington 98072.
2. Defendant IAC Search & Media, Inc. d/b/a Ask.com is a Delaware corporation with, upon information and belief, a place of business located at 555 12th Street, Suite 500, Oakland, California 94607.

JURISDICTION AND VENUE

3. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*
4. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

1 **COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,693,956**

2 12. Deep Web repeats and realleges the allegations of paragraphs 1 through 11
3 as if fully set forth herein.

4 13. Without license or authorization and in violation of 35 U.S.C. § 271(a),
5 Defendant has infringed and continues to infringe the '956 patent by making, using,
6 importing, offering for sale, and/or selling methods for searching dynamic web pages,
7 including, but not limited to Ask.com, which are covered by one or more claims of the
8 '956 patent.

9 14. Deep Web is entitled to recover from Defendant the damages sustained by
10 Deep Web as result of Defendant's infringement of the '956 patent in an amount subject
11 to proof at trial, which, by law, cannot be less than a reasonable royalty, together with
12 interest and costs as fixed by this Court under 35 U.S.C. § 284.

13 **COUNT II – INFRINGEMENT OF U.S. PATENT NO. 7,716,303**

14 15. Deep Web repeats and realleges the allegations of paragraphs 1 through 14
15 as if fully set forth herein.

16 16. Without license or authorization and in violation of 35 U.S.C. § 271(a),
17 Defendant has infringed and continues to infringe the '303 patent by making, using,
18 importing, offering for sale, and/or selling methods and products for searching dynamic
19 web pages associated with a transportation service, including, but not limited to Ask.com,
20 which are covered by one or more claims of the '303 patent.

21 17. Deep Web is entitled to recover from Defendant the damages sustained by
22 Deep Web as result of Defendant's infringement of the '303 patent in an amount subject
23 to proof at trial, which, by law, cannot be less than a reasonable royalty, together with
24 interest and costs as fixed by this Court under 35 U.S.C. § 284.

1 **COUNT III – INFRINGEMENT OF U.S. PATENT NO. 7,730,160**

2 18. Deep Web repeats and realleges the allegations of paragraphs 1 through 17
3 as if fully set forth herein.

4 19. Without license or authorization and in violation of 35 U.S.C. § 271(a),
5 Defendant has infringed and continues to infringe the '160 patent by making, using,
6 importing, offering for sale, and/or selling methods for searching dynamic web pages
7 associated with a hospitality service, including, but not limited to Ask.com, which are
8 covered by one or more claims of the '160 patent.

9 20. Deep Web is entitled to recover from Defendant the damages sustained by
10 Deep Web as result of Defendant's infringement of the '160 patent in an amount subject
11 to proof at trial, which, by law, cannot be less than a reasonable royalty, together with
12 interest and costs as fixed by this Court under 35 U.S.C. § 284.

13 **JURY DEMAND**

14 Deep Web hereby demands a trial by jury on all issues so triable.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, Deep Web requests that this Court enter judgment against
17 Defendant as follows:

18 A. An adjudication that Defendant has infringed the '956 and '303 patents;

19 B. An award of damages to be paid by Defendant adequate to compensate
20 Deep Web for Defendant's past infringement of the '956, '303 and '160 patents and any
21 continuing or future infringement through the date such judgment is entered, including
22 interest, costs, expenses and an accounting of all infringing acts including, but not limited
23 to, those acts not presented at trial;

24 C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an
25 award of Deep Web's reasonable attorneys' fees; and

26 D. An award to Deep Web of such further relief at law or in equity as the
27 Court deems just and proper.

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DATED this 2nd day of May, 2014.

ROHDE & VAN KAMPEN PLLC

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