

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EVERGLADES GAME TECHNOLOGIES, LLC,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. _____
v.	)	
	)	<b>JURY TRIAL DEMANDED</b>
VALVE CORPORATION,	)	
	)	
Defendant.	)	
_____	)	

**COMPLAINT**

For its Complaint, Plaintiff Everglades Game Technologies, LLC ("Everglades"), by and through the undersigned counsel, alleges as follows:

**THE PARTIES**

1. Everglades is a Delaware limited liability company with a place of business located at 1304 SW 160th Avenue #135, Sunrise, Florida 33326.
2. Defendant Valve Corporation is a Washington corporation with, upon information and belief, a place of business located at 10900 NE 4th Street, Suite 500 Bellevue, Washington 98004.

**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.
5. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and

services provided to individuals in this district.

6. Venue is proper in this district pursuant to §§ 1391(b), (c) and 1400(b).

**THE PATENT-IN-SUIT**

7. On December 2, 2003, United States Patent No. 6,656,050 (the "'050 patent"), entitled "Odds Accelerator for Promotional Type Sweepstakes, Games, and Contests," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '050 patent is attached hereto as Exhibit A.

8. Everglades is the assignee and owner of the right, title and interest in and to the '050 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

**COUNT I – INFRINGEMENT OF U.S. PATENT NO. 6,656,050**

9. Everglades repeats and realleges the allegations of paragraphs 1 through 8 as if fully set forth herein.

10. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe the '050 patent by making, using, importing, offering for sale, and/or selling products and services, including, but not limited to, Steam Trading Card games, that provide game pieces that are applied to a game board at a game site, make information available about the pieces needed to complete a winning combination, allow the player to share or trade game pieces, and enable the players to easily and securely store game pieces.

11. Everglades is entitled to recover from Defendant the damages sustained by Everglades as result of Defendant's infringement of the '050 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

**JURY DEMAND**

Everglades hereby demands a trial by jury on all issues so triable.

**PRAYER FOR RELIEF**

WHEREFORE, Everglades requests that this Court enter judgment against Defendant as follows:

- A. An adjudication that Defendant has infringed the '050 patent;
- B. An award of damages to be paid by Defendant adequate to compensate Everglades for Defendant's past infringement of the '050 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Everglades' reasonable attorneys' fees; and
- D. An award to Everglades of such further relief at law or in equity as the Court deems just and proper.

Dated: May 19, 2014

STAMOULIS & WEINBLATT LLC

/s/ Richard C. Weinblatt

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