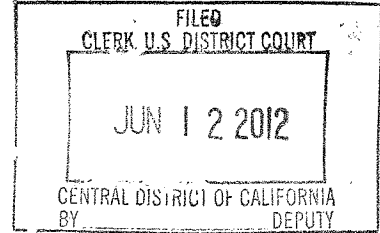


COPY

1 Tyler J. Woods, Bar No. 232464
twoods@trialnewport.com
2 Scott J. Ferrell, Bar No. 202091
sferrel@trialnewport.com
3 NEWPORT TRIAL GROUP
895 Dove Street, Suite 425
4 Newport Beach, CA 92660
Tel: (949) 706-6464
5 Fax: (949) 706-6469



6 Attorneys for Plaintiff ECLIPSE IP LLC

7
8
9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 ECLIPSE IP LLC

12 Plaintiffs,

13 vs.

14 AMERICAN HONDA MOTOR CO.,
15 INC.,

16 Defendants.

Case No. 12-05092 PGK (JL)

COMPLAINT FOR PATENT
INFRINGEMENT

JURY TRIAL DEMANDED

Complaint Filed:
Trial Date:

17 COMPLAINT FOR PATENT INFRINGEMENT

18 Plaintiff Eclipse IP LLC ("Eclipse"), by counsel, complains of defendant
19 American Honda Motor Co., Inc. ("Honda"), as follows:

20 NATURE OF LAWSUIT

21 1. This is a suit for patent infringement arising under the patent laws of the
22 United States, Title 35 of the United States Code § 1 *et seq.* This Court has exclusive
23 jurisdiction over the subject matter of the Complaint under 28 U.S.C. §§ 1331 and
24 1338(a).

25 PARTIES AND PATENTS

26 2. Eclipse is a company organized and existing under the laws of Florida and
27 having a principal place of business address at 115 NW 17th Street, Delray Beach,
28 Florida 33444.

1 continuing to manufacture, distribute, and sell vehicles equipped with the AcuraLink
2 Real-Time Traffic System to its customers after having received notice of its
3 infringement of the '952 patent.

4 10. Honda has knowingly infringed one or more claims of the '900 patent
5 through, among other activities, the use of the AcuraLink Real-Time Traffic System in
6 its vehicles to: alert and/or update drivers regarding changes in various traffic data;
7 monitoring such traffic data in relation the scheduled route to determine if it is
8 necessary to initiate a communication with the driver to relay a change in route and/or
9 estimated travel time.

10 11. Honda has actively induced and/or contributed to the infringement by
11 others of one or more claims of the '900 patent through, among other activities,
12 continuing to manufacture, distribute, and sell vehicles equipped with the AcuraLink
13 Real-Time Traffic System to its customers after having received notice of its
14 infringement of the '900 patent.

15 12. Through direct, induced, and contributory infringement Honda has injured
16 Eclipse, and Eclipse is entitled to recover damages adequate to compensate it for such
17 infringement, but in no event less than a reasonable royalty.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiff Eclipse asks this Court to enter judgment against the
20 defendant and against each of the defendant's respective subsidiaries, affiliates, agents,
21 servants, employees and all persons in active concert or participation with it, granting
22 the following relief:

23 (a) An award of damages adequate to compensate Eclipse for the infringement
24 that has occurred, together with prejudgment interest from the date infringement of the
25 Eclipse Patents began;

26 (b) An award to Eclipse of all remedies available under 35 U.S.C. §§ 284 and
27 285; and,

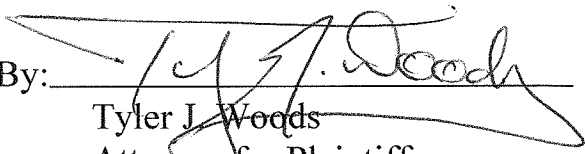
1 (c) Such other and further relief as this Court or a jury may deem proper and
2 just.

3 **DEMAND FOR JURY TRIAL**

4 Pursuant to Federal Rule of Civil Procedure 38 and Civil Local Rule 3-6, Eclipse
5 hereby demands a jury trial on all issues so triable.

6
7 Respectfully submitted this 5th day of June, 2012

8 NEWPORT TRIAL GROUP

9
10 By: 
11 Tyler J. Woods
12 Attorney for Plaintiff
13 ECLIPSE IP LLC
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28