

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CASCADES PUBLISHING INNOVATION, LLC,)	
)	
)	Civil Action No. 1:15-cv-6173
Plaintiff,)	
vs.)	
)	
REED ELSEVIER, INC.,)	JURY TRIAL DEMANDED
)	
Defendant.)	

COMPLAINT

Plaintiff Cascades Publishing Innovation LLC complains of defendant Reed Elsevier, Inc. for infringement of three United States Patents:

PARTIES, JURISDICTION AND VENUE

1. This is a claim for patent infringement arising under the patent laws of the United States, including 35 U.S.C. §271. This Court has exclusive jurisdiction over the subject matter of this action under 28 U.S.C. §1338(a).

2. Cascades Publishing Innovation LLC is a limited liability company established under the laws of Illinois, having its principal place of business at 500 Skokie Boulevard, Suite 250, Northbrook, Illinois 60062. Cascades is the exclusive licensee and has standing to sue for infringement of United States Patents Nos. 8,386,484 B2, 8,972,846 B2, and 8,983,955 B2. The patents are Exhibits A, B and C to this complaint. TimeBase Pty Ltd. is the patent owner, developed the patented technology, and has a financial interest in the outcome of this litigation.

3. Cascades previously filed suit against Reed Elsevier in this District, *Cascades Publishing Innovation, LLC v. Reed Elsevier, Inc.*, 13 CV 5044. Reed Moved to Transfer Venue to the Southern District of Ohio pursuant to 28 U.S.C. § 1404. (ECF 20 in 13 CV 5044). The case was transferred. (ECF 34 in 13 CV 5044). Cascades agreed in December 2014 to dismiss

that suit at Reed's request to further negotiations between the parties. Negotiations over the next six months were unsuccessful.

4. Cascades has filed suit in this District against CCH, a Wolters Kluwer Business, for infringement of the same patents. Cascades will move that this case and the CCH case be reassigned to the same judge in accordance with Local Rule 40.4 or be consolidated for pretrial discovery in accordance with this District's Internal Operating Procedure 13(e), "Coordinated Pretrials In Complex Cases Not Involving Multi-District Litigation." The two cases involve the same plaintiff and the same three patents. Cascades' motion specifies other benefits of consolidation.

5. According to <http://www.lexis.com>, "LexisNexis [is] a division of Reed Elsevier, Inc." LexisNexis has an office at 70 W. Madison, Chicago, IL 60602, according to the "About LexisNexis" link on its website. Reed's Motion to Transfer Venue to the Southern District of Ohio pursuant to 28 U.S.C. § 1404 in 13 CV 5044 said that Reed operates facilities related to Lexis in this district. Through its Lexis services, Reed Elsevier provides legal research products and services nationwide and in this judicial district.

6. Reed Elsevier has used, sold or offered to sell products and services that infringe the patents within this judicial district, and has advertised the sale of such products in this judicial district, including its LexisNexis® Academic service and its LexisNexis® Advance service.

7. Reed Elsevier's Motion to Transfer Venue in 13 CV 5044 represented that it is subject to personal jurisdiction in this judicial district.

8. Reed Elsevier's Motion to Transfer Venue in 13 CV 5044 represented that venue is proper in this district under 28 U.S.C. §§1391(d) and 1400(b).

9. The exhibits to this Complaint are:

A -- United States Patent No. 8,386,484 B2;

B -- United States Patent No. 8,972,846 B2;

C -- United States Patent No. 8,983,955 B2;

D – A claim chart applying claim 1 of the 484 patent to LexisNexis® Academic in the first claim for relief;

E – The Declaration of William Donald Kilgallon;

F – A claim chart applying claim 1 of the 846 patent to LexisNexis® Academic in the second claim for relief;

G – A claim chart applying claim 1 of the 955 patent to LexisNexis® Academic in the third claim for relief;

H – A claim chart applying claim 1 of the 484 patent to LexisNexis® Advance in the fourth claim for relief;

I – A claim chart applying claim 1 of the 846 patent to LexisNexis® Advance in the fifth claim for relief; and

J – A claim chart applying claim 1 of the 955 patent to LexisNexis® Advance in the sixth claim for relief.

Additional claims are likely to apply with respect to each patent.

**FIRST CLAIM FOR RELIEF:
INFRINGEMENT OF THE 484 PATENT BY LEXIS ACADEMIC**

10. Paragraphs 1 to 8 are adopted by reference.
11. Reed Elsevier has infringed the 484 patent at least by making, using, importing, selling or offering to sell products and services, that is, the LexisNexis® Academic service that falls within the scope of at least at least claim 1 of the 484 patent. Exhibit D describes the infringement of claim 1 by the LexisNexis® Academic service.
12. LexisNexis® Academic can be accessed over the Internet. See Exhibit D, page 1.
13. The Declaration of William Donald Kilgallon in support of Reed Elsevier's Motion to Transfer Venue in 14 CV 5044 says at paragraph 3 that "LexisNexis originally pioneered online information with its Lexis® and Nexis® services." The Declaration, executed under penalty of perjury, is Exhibit E to this complaint.
14. The LexisNexis® Academic service publishes electronic data. The data includes text, for example, regulations and statutes. See Exhibit D, page 2.
15. Paragraph 6 of the Kilgallon Declaration says that "LexisNexis® Academic is offered through <http://www.lexisnexis.com/hottopics/lnacademic>."
16. LexisNexis® Academic is available to subscribers via the Internet.
17. Paragraph 4 of the Kilgallon Declaration says that the "LexisNexis® Academic, a product offered under the LexisNexis division, helps students and faculty members at colleges and universities save valuable research time by offering them quick, easy access to more than 15,000 of the most credible business, legal and news sources available in a single location."
18. LexisNexis® Academic includes text-based data.
19. LexisNexis® Academic includes sections of the Canadian Criminal Code. See Exhibit D, page 3.

20. LexisNexis® Academic therefore has a plurality of portions of text-based data. See Exhibit D, page 3.
21. LexisNexis® Academic includes amended sections, for example, the 2001 version of Section 431 of the Canadian Criminal Code. See Exhibit D, pages 4 and 5.
22. Paragraph 8 of the Kilgallon Declaration says that “Both the databases and computer servers for LexisNexis® Academic are physically located in Miamisburg, Ohio, with data center backups in Springboro, Ohio and Lebanon, Ohio.”
23. LexisNexis® Academic stores statutory sections, for example, the 1988 and 2001 versions of Section 431 of the Canadian Criminal Code. See Exhibit D, pages 6 and 7.
24. Paragraph 9 of the Kilgallon Declaration says that “Mr. Bergeron’s group obtains data from a variety of sources from paper documents that are scanned using optical character recognition (OCR) to highly structured data feeds.” The same paragraph says that Mr. Bergeron is expected to testify about “the content used within the LexisNexis® Academic product, the format that that Lexis either receives or purchases that content and the structure of the databases into which that content is organized for use in the LexisNexis® Academic product.”
25. LexisNexis® Academic stores text data in databases.
26. LexisNexis® Academic displays different versions of, for example, Section 431 of the Canadian Criminal Code. See Exhibit D, pages 6 and 7.
27. LexisNexis® Academic stores different versions of statutory sections for selected statutes. If a section is amended, both the original and amended versions are stored. Both are available to subscribers. For example, Academic stores the 1988 and 2001 versions of Section 431 of the Canadian Criminal Code. Section 431 was amended in 2001 to add the word “violent” to the crime proscribed by Section 431. See Exhibit D, pages 4 and 5.

28. Paragraph 9 of the Kilgallon Declaration says that “Mr. Andrew Smith . . . drafted technical requirements for legislative versioning as it was to be implemented in the underlying platform for LexisNexis® Academic. He would be expected to testify as to the development of the LexisNexis® Academic product across versions as well as various aspects of testing the product.”

29. Paragraph 9 of the Kilgallon Declaration says that Mareck Doniec, who is believed to reside in Poland, “originated the concept of legislative versioning.” He “would be expected to testify, as to his historical knowledge regarding the state of the art for legislative versioning, at the time the LexisNexis division of Reed Elsevier was considering implementing this technology.”

30. LexisNexis® Academic uses versioning.

31. LexisNexis® Academic organizes sections by, for example, Section 431 of the Canadian Criminal Code using (1) section number, (2) part, (3) effective date, and (4) jurisdiction. See Exhibit D, pages 8 and 9.

32. Sections can be located in the database by, for example, date, section title, section number, and jurisdiction. For example, a subscriber can locate all versions of Section 431 for the time period in which versions are available. A display pane in LexisNexis® Academic shows current and past versions of sections carrying the number “431.” A subscriber can click on the section of interest and see its text. See Exhibit D, pages 14 and 15.

33. The various ways a section can be organized in a database, for example, date, title, section number, and so forth are attributes of the section. One or more attributes can be used to search the database for a section of interest. See Exhibit D, pages 11 and 12.

34. The subscriber can use another, second pane to choose “Versioning” in a drop-down box. If another version of the statutory section exists, the pane will display the other

versions by their dates. Each version is clickable. LexisNexis® Academic retrieves the section of interest from one of its databases. For example, the pane showing versions of Section 431 includes the section number, the title, and the date. See Exhibit D, pages 14 and 15.

35. Multiple attributes in a database constitute a multidimensional space that is capable of, or involves, more than three dimensions. See Exhibit D, page 16.

36. Additional claims of the 484 patent may apply to LexisNexis® Academic.

37. Representatives of TimeBase Pty Ltd., the owner of the patents, exchanged information with, and met with, representatives of LexisNexis in 2004 and 2005. TimeBase provided technical details regarding the technology used in the 484 patent and in a related patent. TimeBase was told by a third party that an employee of LexisNexis in Dayton, Ohio, Mr. Paul Knodel, was evaluating TimeBase's proprietary technology. Stephen Casbeer, Lawrence Stern and Ray Daley are believed to be other LexisNexis employees in the Dayton area who were exposed to TimeBase's technical information.

38. After Cascades became the exclusive licensee of the patents, it notified Reed Elsevier of its infringement of the 484 patent by a letter to the Chief Executive Officer of LexisNexis on April 4, 2013. Cascades did not receive any response to its letter, and sent another letter on October 11, 2013. Cascades filed the suit referred to in paragraph 3 above. After transfer, Cascades agreed in December 2014 to dismiss that suit at Reed's request to further negotiations between the parties. Negotiations over the next six months were unsuccessful. Copies of the 846 and 955 patents were sent to the attorneys for Reed Elsevier on April 1, 2015.

39. Reed Elsevier's acts of infringement have injured Cascades, and it is entitled to recover damages adequate to compensate it for the infringement that has occurred, but in no event less than a reasonable royalty.

40. The infringement by Reed Elsevier has injured and will continue to injure Cascades unless and until the infringement is enjoined.

**SECOND CLAIM FOR RELIEF:
INFRINGEMENT OF THE 846 PATENT BY LEXISNEXIS ACADEMIC**

41. Paragraphs 1 to 8, the paragraphs citing Exhibit E, the Kilgallon Declaration (¶¶ 13, 15, 17, 19, 22, 24, 28 and 29) and 37 to 38 are adopted by reference.

42. Reed Elsevier has infringed the 846 patent at least by making, using, importing, selling or offering to sell products and services, that is, the LexisNexis® Academic service that falls within the scope of at least at least claim 1 of the 846 patent. Exhibit F describes the infringement of claim 1 by the LexisNexis® Academic service

43. LexisNexis® Academic provides electronic data. In other words, it makes information in the form of text, for example, the Canadian Criminal Code, available to persons using a computer and browser. See slide 1.1.2 of Exhibit F.

44. LexisNexis® Academic uses a multidimensional space that is capable of more than three dimensions. See slides 1.1.1 and 1.1.3 of Exhibit F. A database is one form of multidimensional space. LexisNexis® Academic can access text in multiple ways: hierarchy/sequence, version, jurisdiction, and type. See Exhibit F, slide 1.1.3.

45. LexisNexis® Academic includes text-based data, for example, the text of the Canadian Criminal Code. See slide 1.2.1 of Exhibit F.

46. LexisNexis® Academic includes sections of the Canadian Criminal Code. See slide 1.2.1 of Exhibit F. It shows the 1988 version of “R.S.C. 1985, c. C-46, Part XI, Section 431”. See Slide 1.2.1 of Exhibit F.

47. LexisNexis® Academic includes the 2001 version of the Canadian Criminal Code section “R.S.C. 1985, c. C-46, Part XI, Section 431”. See slide 1.2.2 of Exhibit F.

48. The 2001 version of Section 431 adds “violent.” See slide 1.2.3 of Exhibit F.

49. A section of a statute is a predefined portion. LexisNexis® Academic includes predefined portions.

50. An amended version of the same section is a modified predefined portion.

LexisNexis® Academic includes at least one amended predefined portion.

51. Portions include text, for example, Section 431 of the Canadian Criminal Code.

LexisNexis® Academic includes portions containing text-based data.

52. LexisNexis® Academic can display at least one portion in a first display region on a computer, for example, the text of the 2001 version of Section 431. See slides 1.3 and 1.3.1 of Exhibit F.

53. The display region includes links to other sections of the Canadian Criminal Code and to other versions of Section 431. See slides 1.4.1 and 1.4.2 of Exhibit F.

54. A user can connect to, for example, other versions of Section 431. See slide 1.4.2 of Exhibit F. It shows a link to the 1988 version of Section 431.

55. A user can connect to, for example, other sections of the Canadian Criminal Code using the link shown in slide 1.4.1 of Exhibit F.

56. The 2001 version of “R.S.C. 1985, c. C-46, Part XI, Section 431” is stored. See slide 1.5.1 of Exhibit F.

57. Predefined portions are points on an axis of the multidimensional space. For example, the hierarchy/section axis has points that are sections. See slides 1.6 and 1.6.1 of Exhibit F.

58. Section 431 is a point on a first axis.

59. LexisNexis® Academic enables movement between two different predefined portions. For example, one can move from Section 431 of the Canadian Criminal Code to Section 432. See slides 1.7.1 and 1.7.2 of Exhibit F.

60. LexisNexis® Academic enables movement from one version of Section 431 to another version of Section 431. See slide 1.7.3 of Exhibit F.

61. LexisNexis® Academic has navigation on a second axis.

62. Once a user has selected the link to the 1988 version of Section 431, that section is displayed. See slide 1.7.4 of Exhibit F.

63. The 1988 version depicted in slide 1.7.4 is a second predefined portion.

64. Section 432 can be chosen for display from a list of sections in the Canadian Criminal Code. See slides 1.7.1 and 1.8.1 of Exhibit F.

65. A particular version of Section 431 can be displayed. See slides 1.7.3 and 1.8.2 of Exhibit F.

66. LexisNexis® Academic includes the display of a second point, or a plurality of points, on either a first or a second axis.

67. A predefined portion is selected, at least in part, based on its usability and structure, for example a section of the Canadian Criminal Code. See slide 1.9 and 1.9.1 of Exhibit F.

68. Additional claims of the 846 patent may apply to LexisNexis® Academic.

69. Reed Elsevier's acts of infringement have injured Cascades, and it is entitled to recover damages adequate to compensate it for the infringement that has occurred, but in no event less than a reasonable royalty.

70. The infringement by Reed Elsevier has injured and will continue to injure Cascades unless and until the infringement is enjoined.

**THIRD CLAIM FOR RELIEF:
INFRINGEMENT OF THE 955 PATENT BY LEXISNEXIS ACADEMIC**

71. Paragraphs 1 to 8, the paragraphs citing Exhibit E, the Kilgallon Declaration (¶¶ 13, 15, 17, 19, 22, 24, 28 and 29) and 37 to 38 are adopted by reference.

72. Reed Elsevier has infringed the 955 patent at least by making, using, importing, selling or offering to sell products and services, that is, the LexisNexis® Academic service that falls within the scope of at least at least claim 1 of the 955 patent. Exhibit G describes the infringement of claim 1 by the LexisNexis® Academic service.

73. LexisNexis® Academic publishes electronic information on a computer including the Canadian Criminal Code. See slide 1.1.1 of Exhibit G.

74. LexisNexis® Academic includes text-based data, for example, the text of the Canadian Criminal Code “R.S.C. 1985, c. C-46, Part XI, Section 431” as of 1988. See slide 1.2.1 of Exhibit G.

75. LexisNexis® Academic stores the 1988 version of Section 431. See slide 1.2.1 of Exhibit G.

76. LexisNexis® Academic includes the 2001 version of the Canadian Criminal Code section “R.S.C. 1985, c. C-46, Part XI, Section 431”. See slide 1.3.1 of Exhibit G.

77. LexisNexis® Academic includes an amended version of a statute, for example, the 2001 version of Section 431. “Violent” has been added to the 2001 version of Section 431. See slides 1.3.1 and 1.3.2 of Exhibit G.

78. A section of a statute is a predefined portion. LexisNexis® Academic includes predefined portions.

79. An amended version of the same section is a modified predefined portion. LexisNexis® Academic includes at least one amended predefined portion.

80. Portions include text, for example, Section 431.
81. The display of Section 431 includes a drop-down menu that includes a versioning selection. See slides 1.4.1 and 1.4.2 of Exhibit G.
82. Multiple versions of a statute, for example, the 2001 and the 1988 versions of Section 431 are available. See slides 1.4.2 of Exhibit G.
83. LexisNexis® Academic links a predefined portion of text, the 1988 version of Section 431, with a modified predefined portion, the 2001 version of Section 431.
84. LexisNexis® Academic uses terms to describe text-based data, for example, one or more of section number, version, jurisdiction or type. See slides 1.5.1 and 1.5.2 of Exhibit G.
85. These terms are attributes used in LexisNexis® Academic to organize, for example, the 1988 and 2001 versions of Section 431. See slide 1.5.3.
86. A version, for example, 2009 USCS § 112, can be displayed. See slide 1.4.3 of Exhibit G.
87. Each line of blue text on the screen shown in slide 1.4.2 connects to a screen showing that version of 35 USCS § 112. See, for example, slide 1.4.3 of Exhibit G.
88. Each line of blue text on the screen shown in slide 1.4.2 is written in a markup language, HTML (hypertext markup language).
89. LexisNexis® Academic includes a plurality of attributes.
90. Each attribute is a point in a multidimensional space.
91. LexisNexis® Academic uses a multidimensional space that is capable of, or involves, more than three dimensions. See slide 1.5.1 of Exhibit G.
92. Additional claims of the 955 patent may apply to LexisNexis® Academic.

93. Reed Elsevier's acts of infringement have injured Cascades, and it is entitled to recover damages adequate to compensate it for the infringement that has occurred, but in no event less than a reasonable royalty.

94. The infringement by Reed Elsevier has injured and will continue to injure Cascades unless and until the infringement is enjoined.

**FOURTH CLAIM FOR RELIEF:
INFRINGEMENT OF THE 484 PATENT BY LEXISNEXIS ADVANCE**

95. Paragraphs 1 to 8 and 37 to 38 are adopted by reference.

96. Reed Elsevier has infringed the 484 patent at least by making, using, importing, selling or offering to sell products and services, that is, the LexisNexis® Advance service that falls within the scope of at least at least claim 1 of the 484 patent. Exhibit H describes the infringement of claim 1 by the LexisNexis® Advance service.

97. LexisNexis® Advance can be accessed over the Internet using a browser. See Exhibit H, page 1.

98. LexisNexis® Advance displays a table of contents of, for example, Titles of the United States Code. See Exhibit H, page 2.

99. LexisNexis® Advance displays sections of the United States Code, for example, 2009 35 USCS § 112. See Exhibit H, page 3.

100. LexisNexis® Advance displays amended versions of statutes, for example, 35 USCS § 112 as of 2014. See Exhibit H, pages 4 and 5.

101. LexisNexis® Advance stores both original and amended versions of sections, for example, the 2009 and 2014 versions of § 112. See Exhibit H, pages 6 and 7.

102. LexisNexis® Advance has attributes for each section, for example, (1) section number, (2) title, (3) effective date, and (4) jurisdiction for § 112. See Exhibit H, page 8.

103. LexisNexis® Advance uses an attribute to link related portions, for example, the 2009 and 2014 versions of § 112. See Exhibit H, pages 10 and 11.

104. LexisNexis® Advance permits sections to be searched using an attribute, for example, the title or section number. See Exhibit H, page 12.

105. LexisNexis® Advance displays search results. The displayed results include links to relevant sections of the United States Code. See Exhibit H, page 13.

106. The sections linked from the search results can be displayed graphically. See Exhibit H, page 14.

107. The displayed section can include links to older versions of the displayed section. See Exhibit H, pages 15 to 17.

108. LexisNexis® Advance uses multiple attributes and therefore employs a multidimensional space. See Exhibit H, page 18.

109. Reed Elsevier's acts of infringement have injured Cascades, and it is entitled to recover damages adequate to compensate it for the infringement that has occurred, but in no event less than a reasonable royalty.

110. The infringement by Reed Elsevier has injured and will continue to injure Cascades unless and until the infringement is enjoined.

**FIFTH CLAIM FOR RELIEF:
INFRINGEMENT OF THE 846 PATENT BY LEXISNEXIS ADVANCE**

111. Paragraphs 1 to 8 and 37 to 38 are adopted by reference.

112. Reed Elsevier has infringed the 846 patent at least by making, using, importing, selling or offering to sell products and services, that is, the LexisNexis® Advance service that falls within the scope of at least at least claim 1 of the 846 patent. Exhibit I describes the infringement of claim 1 by the LexisNexis® Advance service.

113. LexisNexis® Advance publishes electronic data. In other words, it makes information in the form of text, for example, 35 USCS § 112 available to persons using a computer and browser. See slide 1.1.2 of Exhibit I.

114. LexisNexis® Advance uses a multidimensional space that is capable of more than three dimensions. See slides 1.1.1 and 1.1.3 of Exhibit I. A database is one form of multidimensional space. LexisNexis® Advance can describe a section in multiple ways: hierarchy/sequence, version, Shepard's citations, and expert opinions. See Exhibit I, slide 1.1.3.

115. LexisNexis® Advance includes text-based data, for example, the text of 2009 35 USCS § 112. See slide 1.2.1 of Exhibit I.

116. LexisNexis® Advance includes court decisions concerning text-based data, for example, *Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120 (2014). See slide 1.2.2 of Exhibit I.

117. LexisNexis® Advance includes articles about § 112, for example, "2010 Emerging Issues 5335, Sec. 112 Does Include a Separate Written Description Requirement." See slide 1.2.3 of Exhibit I.

118. LexisNexis® Advance includes an amended version of a statute, for example, the 2015 version of the U.S. Code section 35 USCS Section 112. See slides 1.2.4 and 1.2.5 of Exhibit I.

119. A section of a statute is a predefined portion. LexisNexis® Advance includes predefined portions.

120. An amended version of the same section is a modified predefined portion. LexisNexis® Advance includes at least one amended predefined portion.

121. Portions include text, for example, §112. LexisNexis® Advance includes portions containing text-based data.

122. LexisNexis® Advance can display at least one portion in a first display region on a computer, for example, the text of parts of 35 USCS § 112. See slides 1.3 and 1.3.1 of Exhibit I.

123. The display region includes the links “Shepardize® this document,” “Archived code versions” and “Expert Analysis.” See slide 1.4.1 of Exhibit I.

124. A user can connect to, for example, other versions of § 112. See slide 1.4.1 of Exhibit I.

125. The sections of a statute are stored in a LexisNexis® database. See slide 1.5.1 of Exhibit I.

126. Predefined portions are points on an axis of the multidimensional space. For example, the hierarchy/section axis has points that are sections. See slides 1.6.1 to 1.6.3 of Exhibit I.

127. LexisNexis® Advance enables movement between two different predefined portions. For example, when the blue text under 35 USCS § 112 is clicked, a list of sections of Title 35 is displayed. See slides 1.7.1 and 1.7.2 of Exhibit I.

128. If the blue text “§ 113 Drawings” is clicked, the user is taken to the text of 35 USCS § 113. See slides 1.7.2 and 1.7.3 of Exhibit I.

129. If the blue text “Archived code versions (22)” on slide 1.7.1 is clicked, the user is taken to a list of numerous versions of 35 USCS § 112 for 2013, 2011, 2010, 2009, 2008, 2007, 2006, 2005 and 2004. See slide 1.7.4 of Exhibit I.

130. A version, for example, 2009 USCS § 112, can be displayed. See slide 1.7.5 of Exhibit I.

131. The versions depicted on slide 1.7.4 constitute a second axis in LexisNexis® Advance.

132. Each of the versions depicted in slide 1.7.4 is a second predefined portion.
133. If the blue text “Shepardize® this document” is selected (slide 1.7.1), the user is taken to a new screen showing a list of citing decisions. See slide 1.7.6 of Exhibit I.
134. A user can select one of the citations, for example, *Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120 (2014), for display. See slide 1.7.6 of Exhibit I.
135. The selected decision is displayed. See slide 1.7.7 of Exhibit I.
136. LexisNexis® Advance enables a user to navigate from a point on one axis, the text of 35 USCS § 112 (slide 1.7.1) to another point on a different axis, the Nautilus citation. See slides 1.7.1 and 1.7.7 of Exhibit I.
137. LexisNexis® Advance enables a user to navigate from a point on one axis, the text of 35 USCS § 112 (slide 1.7.1) to another point on still another different axis, for example, expert analyses of § 112. See slide 1.7.8 of Exhibit I.
138. If the user selects, for example, “Sec. 112. Paragraph One Does Include A Separate Written Description Requirement, 2010 Emerging Issues 5335,” the user is taken to another screen showing the text of the article. See slides 1.7.8 and 1.7.9 of Exhibit I.
139. LexisNexis® Advance includes one or more links, for example, “Shepardize® this document,” “Archived code versions” or “Expert Analysis.”
140. LexisNexis® Advance enables movement from one predefined portion to another second predefined portion related to the first.
141. LexisNexis® Advance enables the display of information, for example, the text of 35 USCS § 113 that corresponds to the list of sections. See slides 1.7.1 and 1.8.1 or 1.8.2 or 1.8.4 of Exhibit I.
142. A predefined portion is selected, at least in part, based on its usability and structure, for example a section of Title 35 USCS. See slides 1.9 and 1.9.1 of Exhibit I.

143. Additional claims of the 846 patent may apply to LexisNexis® Advance.

144. Reed Elsevier's acts of infringement have injured Cascades, and it is entitled to recover damages adequate to compensate it for the infringement that has occurred, but in no event less than a reasonable royalty.

145. The infringement by Reed Elsevier has injured and will continue to injure Cascades unless and until the infringement is enjoined.

**SIXTH CLAIM FOR RELIEF:
INFRINGEMENT OF THE 955 PATENT BY LEXISNEXIS ADVANCE**

146. Paragraphs 1 to 8 and 37 to 38 are adopted by reference.

147. Reed Elsevier has infringed the 955 patent at least by making, using, importing, selling or offering to sell products and services, that is, the LexisNexis® Advance service that falls within the scope of at least at least claim 1 of the 955 patent. Exhibit J describes the infringement of claim 1 by the LexisNexis® Advance service.

148. LexisNexis® Advance publishes electronic data that can be read on a computer. In other words, it makes information in the form of text, for example, 35 USCS § 112, available to persons using a computer and browser. See slide 1.1.1 of Exhibit J.

149. LexisNexis® Advance includes text-based data, for example, the text of 2009 35 USCS § 112. See slide 1.2.1 of Exhibit J.

150. LexisNexis® Advance includes court decisions concerning text-based data, for example, *Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120 (2014). See slide 1.2.2 of Exhibit J.

151. LexisNexis® Advance includes expert analyses about § 112, for example, “2010 Emerging Issues 5335, Sec. 112 Does Include a Separate Written Description Requirement.” See slide 1.2.3 of Exhibit J.

152. LexisNexis® Advance includes an amended version of a statute, for example, the 2015 version of 35 USCS Section 112. See slides 1.3.1 and 1.3.2 of Exhibit J.

153. A section of a statute is a predefined portion. LexisNexis® Advance includes predefined portions.

154. An amended version of the same section is a modified predefined portion. LexisNexis® Advance includes at least one amended predefined portion.

155. Portions include text, for example, §112. LexisNexis® Advance includes portions containing text-based data.

156. The display of the 2015 version of 35 USCS § 112 includes the links “Shepardize® this document,” “Archived code versions (22)” and “Expert Analysis (8).” See slide 1.4.1 of Exhibit J.

157. Multiple versions of a statute, for example, the 2009 and the 2015 versions of 35 USCS § 112 are available. See slides 1.4.1 and 1.4.2 of Exhibit J.

158. If the blue text “Archived code versions (22)” on slide 1.7.1 is clicked, the user is taken to a list of numerous versions of 35 USCS § 112 for 2013, 2012, 2011, 2010, 2009, 2008, 2007, 2006, 2005 and 2004. See slides 1.4.1 and 1.4.2 of Exhibit J.

159. A version, for example, 2009 USCS § 112, can be displayed. See slide 1.4.3 of Exhibit J.

160. Each line of blue text on the screen shown in slide 1.4.2 connects to a screen showing that version of 35 USCS § 112. See, for example, slide 1.4.3 of Exhibit J.

161. Each line of blue text on the screen shown in slide 1.4.2 is written in a markup language, HTML (hypertext markup language).

162. LexisNexis® Advance uses terms to describe text-based data, for example, one or more of section number, version, Shepard's citation or expert opinion. See slides 1.1.1, 1.4.2, 1.4.3, 1.5.1, and 1.5.2 of Exhibit J.

163. These terms are attributes used in LexisNexis® Advance to organize, for example, the 2009 and 2015 versions of 35 USCS § 112. See slide 1.5.3 of Exhibit J.

164. LexisNexis® Advance includes a plurality of attributes.

165. Each attribute is a point in a multidimensional space.

166. LexisNexis® Advance uses a multidimensional space that is capable of, or involves, more than three dimensions. See slides 1.5.1 and 1.5.2 of Exhibit J.

167. Additional claims of the 955 patent may apply to LexisNexis® Advance.

168. Reed Elsevier's acts of infringement have injured Cascades, and it is entitled to recover damages adequate to compensate it for the infringement that has occurred, but in no event less than a reasonable royalty.

169. The infringement by Reed Elsevier has injured and will continue to injure Cascades unless and until the infringement is enjoined.

DEMAND FOR RELIEF

Cascades respectfully demands judgment against Reed Elsevier and its subsidiaries and affiliates as follows:

- A. An award of damages adequate to compensate Cascades for the infringement that has occurred, together with prejudgment interest from the date infringement of each of the patents began and through the lifetime of each of the patents;
- B. Any other damages permitted, including any for willful infringement, under 35 U.S.C. § 284;
- C. A finding that this case is exceptional and an award to Cascades of its attorneys' fees and expenses as provided by 35 U.S.C. § 285;
- D. An injunction permanently prohibiting Reed Elsevier, and all persons in active concert or participation with it, from further acts of infringement of each of the patents; and
- E. Such other and further relief as this Court or a jury may deem proper.

JURY DEMAND

Plaintiff demands a trial by jury.

Respectfully submitted,

s/ Joseph N. Hosteny _____

Joseph N. Hosteny

Arthur A. Gasey

Niro, Haller & Niro

181 West Madison Street, Ste. 4600

Chicago, IL 60602

Phone: 312-236-0733

Fax: 312-236-3137

jhosteny@hosteny.com

gasey@nshn.com

Attorneys for Cascades Publishing Innovation LLC