

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

| | |
|-----------------------------------|------------------------------|
| DASHBOARD COMPUTING LLC, |) |
| |) |
| Plaintiff, |) |
| |) Civil Action No. _____ |
| v. |) |
| |) JURY TRIAL DEMANDED |
| JPMORGAN CHASE & CO. and JPMORGAN |) |
| CHASE BANK, NATIONAL ASSOCIATION, |) |
| |) |
| Defendants. |) |
| _____ |) |

COMPLAINT

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

THE PARTIES

1. Dashboard Computing is a Texas limited liability company with a place of business located at 1400 Preston Road, Suite 400, Plano, Texas 75093.
2. Defendant JPMorgan Chase & Co. is a Delaware company with, upon information and belief, a place of business located at 112 West Austin Street, Marshall, Texas 75670.
3. Defendant JPMorgan Chase Bank, National Association is a national banking association with, upon information and belief, a place of business located at 1111 Polaris Pkwy Columbus, Ohio 43240.
4. Upon information and belief, JPMorgan Chase Bank, National Association is a subsidiary of JPMorgan Chase & Co.
5. Upon information and belief, JPMorgan Chase & Co. has registered with the Texas Secretary of State to conduct business in Texas.

JURISDICTION AND VENUE

6. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

7. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

8. Upon information and belief, Defendants conduct 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.

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

THE PATENT-IN-SUIT

10. On June 27, 1998, United States Patent No. 6,222,543 (the "'543 patent"), entitled "Method And Apparatus For Attaching Navigational History Information To Universal Resource Locator Links On A World Wide Web Page," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '543 patent is attached hereto as Exhibit A.

11. Dashboard Computing is the assignee and owner of the right, title and interest in and to the '543 patent, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 6,222,543

12. Dashboard Computing repeats and realleges the allegations of paragraphs 1 through 11 as if fully set forth herein.

13. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendants have infringed and continues to infringe at least claim 8 of the '543 patent by

making, using, importing, offering for sale, and/or selling a computer implemented method and system for organization and presentation of visual information on a computer display screen, including, but not limited to, methods and systems used to operate www.chase.com.

14. Dashboard Computing is entitled to recover from Defendants the damages sustained by Dashboard Computing as a result of Defendants' infringement of the '543 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

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

PRAYER FOR RELIEF

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

- A. An adjudication that Defendants have infringed the '543 patent;
- B. An award of damages to be paid by Defendants adequate to compensate Dashboard Computing for Defendants' past infringement of the '543 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; and
- C. An award to Dashboard Computing of such further relief at law or in equity as the Court deems just and proper.

Dated: August 4, 2015

/s/Andrew W. Spangler

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