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

Honeyman Cipher Solutions LLC,	Case No. _____
Plaintiff,	Patent Case
v.	Jury Trial Demanded
Groupon, Inc.,	
Defendant.	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Honeyman Cipher Solutions LLC ("Honeyman"), through its attorneys, complains of Groupon, Inc. ("Groupon"), and alleges the following:

PARTIES

1.   Plaintiff Honeyman Cipher Solutions LLC is a corporation organized and existing under the laws of Delaware and maintains its principal place of business at 675 Town Square Blvd., Suite 200, Garland, TX 75040.

2.   Defendant Groupon, Inc. is a corporation organized and existing under the laws of Delaware that maintains its principal place of business at 600 West Avenue, Suite 400, Chicago, IL 60654.

JURISDICTION

3.   This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

4.   This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5.   This Court has personal jurisdiction over Groupon because it has engaged in systematic and continuous business activities in this District. As described below, Groupon has committed acts of patent infringement giving rise to this action within this District.

VENUE

6.   Venue is proper in this District under 28 U.S.C. § 1400(b) because Groupon has committed acts of patent infringement in this District and has an established place of business in this District. In addition, Honeyman has suffered harm in this district.

PATENT-IN-SUIT

7.   Honeyman is the assignee of all right, title and interest in United States Patent No. 5,991,399 (the "'399 Patent" or "Patent-in-Suit"), including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the Patent-in-Suit. Accordingly, Honeyman possesses the exclusive right and standing to prosecute the present action for infringement of the Patent-in-Suit by Groupon.

The '399 Patent

8.   The '399 Patent is entitled "System and Method for Creating Dynamic Playlists," and issued February 25, 2003. The application leading to the '399 Patent was filed on November 15, 2000, which claims priority from provisional application number 60/166,039, filed on November 17, 1999; which claims priority from provisional application number 60/165,726, filed on November 15, 1999; which claims priority from provisional application number 60/165,727, filed on November 15, 1999. A true and correct copy of the '399 Patent is attached hereto as Exhibit 1 and incorporated herein by reference.

9.   The '399 Patent is valid and enforceable.

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COUNT I: INFRINGEMENT OF THE '399 PATENT

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10.   Honeyman incorporates the above paragraphs herein by reference.

11.   **Direct Infringement.** Groupon has been and continues to directly infringe one or more claims of the '399 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Groupon Android and iOS Mobile Apps ("Exemplary Groupon Products") that infringe at least exemplary claims 1-2, 9-11, 34 of the '399 Patent (the "Exemplary '399 Patent Claims") literally or by the doctrine of equivalence. On information and belief, numerous other devices that infringe the claims of the Patent-in-Suit have been made, used, sold, imported, and offered for sale by Groupon and/or its customers.

12.   Exhibit 2 includes charts comparing the Exemplary '399 Patent Claims to the Exemplary Groupon Products. As set forth in these charts, this Exemplary Groupon Products practices the technology claimed by the '399 Patent. Accordingly, the Exemplary Groupon Products incorporated in these charts satisfy all elements of the Exemplary '399 Patent Claims.

13.   Honeyman therefore incorporates by reference in its allegations herein the claim charts of Exhibit 2.

14.   Honeyman is entitled to recover damages adequate to compensate for Groupon's infringement.

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JURY DEMAND

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15.   Under Rule 38(b) of the Federal Rules of Civil Procedure, Honeyman respectfully requests a trial by jury on all issues so triable.

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PRAYER FOR RELIEF

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WHEREFORE, Honeyman respectfully requests the following relief:

A.   A judgment that the '399 Patent is valid and enforceable.

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B.   A judgment that Groupon has infringed, contributorily infringed, and/or induced infringement of one or more claims of the '399 Patent;

C.   An accounting of all damages not presented at trial;

D.   A judgment that awards Honeyman all appropriate damages under 35 U.S.C. § 284 for Groupon's past infringement of the Patent-in-Suit, up until the date such judgment is entered, including pre- or post-judgment interest, costs, and disbursements as justified under 35 U.S.C. § 284 and, if necessary, to adequately compensate Honeyman for Groupon's infringement, an accounting:

   i.   that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and that Honeyman be awarded its reasonable attorneys' fees against Groupon that it incurs in prosecuting this action;

   ii.   that Honeyman be awarded costs, and expenses that it incurs in prosecuting this action; and

   iii.   that Honeyman be awarded such further relief at law or in equity as the Court deems just and proper.

Dated: June 5, 2019   Respectfully submitted,

                                    /s/ Isaac Rabicoff
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