

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**TRANSOCEAN OFFSHORE DEEPWATER
DRILLING INC.**

Plaintiff,

v.

STENA DRILLING LIMITED

Defendants.

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CASE NO: _____

JURY DEMANDED

ORIGINAL COMPLAINT

Transocean Offshore Deepwater Drilling Inc. (“Transocean”), for its original complaint of patent infringement against defendant Stena Drilling Limited (“Stena”), alleges as follows:

The Parties

1. Plaintiff Transocean is a Delaware corporation having a place of business at 4 Greenway Plaza, Houston, Texas 77046.
2. On information and belief, Stena is a foreign corporation with a place of business at 2727 Allen Parkway, 14th Floor, Houston, Texas 77019.

Jurisdiction & Venue

3. This action arises under the patent statutes of the United States, 35 U.S.C. § 271 et seq. Accordingly, the Court has federal question jurisdiction over this matter under 28 U.S.C. §§ 1331 and 1338(a).
4. The court has specific and general jurisdiction over Stena.

5. Venue is properly within this district in accordance with 28 U.S.C. § 1391 (b) and (c) and § 1400 (b).

Facts and Background

The Transocean Patents

6. On April 11, 2000, United States Patent No. 6,047,781 (the “‘781 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘781 Patent is attached as Exhibit A and incorporated herein.

7. On May 2, 2000, United States Patent No. 6,056,071 (the “‘071 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘071 Patent is attached as Exhibit B and incorporated herein.

8. On May 30, 2000, United States Patent No. 6,068,069 (the “‘069 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘069 Patent is attached as Exhibit C and incorporated herein.

9. On July 11, 2000, United States Patent No. 6,085,851 (the “‘851 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drill Method and Apparatus. A copy of the ‘851 Patent is attached as Exhibit D and incorporated herein.

10. Collectively, the above-mentioned patents are the Transocean patents. Transocean owns the Transocean patents by assignment dated March 9, 2004.

Stena Infringes the Transocean Patents

11. Stena is building three dual activity ultra deepwater drillships in South Korea called the Stena DrillMAX I, II and III. On information and belief, the design of the drillships are covered by apparatus claims of the Transocean patents.

12. On information and beliefs, Stena negotiated and contracted with Repsol YPF to provide the Stena DrillMAX I under a four year contract for use in the Gulf of Mexico by early 2008.

13. On information and belief, Stena has recently bid to provide the Stena DrillMAX III to Eni US Operating Co. Inc. for operations under a four year contract in the Gulf of Mexico.

14. Transocean notified Stena of its infringing activities by letter dated June 7, 2007.

Count 1: Patent Infringement

15. Transocean adopts and incorporates by reference the allegations set forth in the paragraphs 1-14.

16. On information and belief, Stena infringed claims in the Transocean patents by selling and offering for sale the Stena DrillMAX I for use in the Gulf of Mexico and offering for sale the Stena DrillMAX III for use in the Gulf of Mexico.

17. On information and belief, Stena will continue to infringe the claims in the Transocean patents unless enjoined by this Court.

18. Transocean has been damaged and will continue to be damaged by Stena's infringing acts.

19. On information and belief, Stena was actually aware of the Transocean patents and willfully committed acts of infringement.

Jury Demand

20. Transocean demands a trial by jury on all issues.

Prayer for Relief

WHEREFORE, Transocean prays the Court to:

- (a) grant a permanent injunction against Stena's continued infringement;
- (b) award damages of not less than a reasonable royalty;
- (c) find that Stena's infringement has been willful and under 35 U.S.C. § 284 and increase such damages to three times the awarded amount;
- (d) award prejudgment and postjudgment interest;
- (e) find that this case is an exceptional case under 35 U.S.C. § 285 and award attorneys' fees;
- (f) award costs; and
- (g) grant all other relief to which Transocean is entitled.

Date: August 30, 2007

Respectfully submitted,

/s/Charles B. Walker, Jr.

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