

1 UNITED STATES DISTRICT COURT FOR  
2 THE EASTERN DISTRICT OF NEW YORK

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9 Attorneys for Plaintiff Glory Licensing LLC

10 GLORY LICENSING LLC

11 Plaintiff,

12 v.

13 UNITED AIRLINES, INC.,

14 Defendant.

15 Case No. 09-CV-5569 (DLI) (RML)

16 FIRST AENDED COMPLAINT FOR  
17 PATENT INFRINGEMENT

18 DEMAND FOR JURY TRIAL

19 Plaintiff, Glory Licensing LLC, a limited liability company (hereinafter referred to as  
20 "Glory"), demands a jury trial and complains against the defendant as follows:

21 **THE PARTIES**

22 1. Glory is a limited liability company organized and existing under the laws of the  
23 Island of Nevis, with its principal place of business at P.O. Box 733, Springates South, Government  
24 Road, Charlestown, Nevis.

25 2. Upon information and belief, United Airlines, Inc. (hereinafter referred to as  
26 "Defendant" or "United") is a business organized and existing under the laws of the State of Illinois,  
27 having a place of business in this district.

28 **JURISDICTION AND VENUE**

1 This action arises under the patent laws of the United States of America, Title 35 of  
2 the United States Code. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and  
3 1338(a).

4 Upon information and belief, Defendant is doing business and committing  
5 infringements in this judicial district and is subject to personal jurisdiction in this judicial district.



1 Website, according to customizable transmission format instructions in a manner defined by the  
2 claims of the '383 patent.

3 13. The content instructions and transmission format instructions utilized on the first  
4 computer system are received from the second computer system, the United Website.

5 14. A United reservations sales agent can book a flight for a customer who calls a  
6 United reservation center such as the one in Chicago, Illinois or in the Philippines. Alternatively, a  
7 third-party travel agent such as one working at Liberty Travel can book a flight for a customer who  
8 calls a travel agency. The sales or travel agent can enter customer information including the city,  
9 date and time of the departing flight, and the city, date and time of the return flight into HTML form  
10 elements displayed on the web page found at <http://www.united.com/> of the Website to make the  
11 flight reservation and/or ticket purchase for the customer. The foregoing information entered into  
12 the computerized form document on the first computer system is extracted according to content  
13 instructions, and then transmitted to an application program running on the second computer  
14 system, i.e., the United Website, in a format and using a protocol required by the application  
15 program, in order to process the reservation and/or sale.  
16

17 15. Plaintiff Glory alleges that United is infringing claims 1, 3-4, 6-7, 9-10, 12-13, 15-  
18 16, 18-19, 21-22, 24-25 and 27 of the '383 Patent.  
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20 16. Plaintiff, Glory, has been damaged by such infringing activities by the Defendant of  
21 the '383 patent and will be irreparably harmed unless such infringing activities are enjoined by this  
22 Court.

23 **COUNT TWO**

24 17. Plaintiff, Glory, repeats and incorporates herein the entirety of the allegations  
25 contained in paragraphs 1 through 16 above.

26 18. Defendant United has for a long time past and still is infringing in this judicial  
27 district the '768 patent by, among other things, processing information on the website at  
28

1 [www.united.com](http://www.united.com) (“United Website”) pursuant to a claim of the ‘768 patent, without permission  
2 from Glory, in which information not derived from a scanned hard copy is extracted from a  
3 computerized form document displayed on a first computer system according to content instructions  
4 and transmitted to an application program operating on a second computer system, i.e., the United  
5 Website, according to customizable transmission format instructions in a manner defined by the  
6 claims of the ‘768 patent.

7  
8 19. The content instructions and transmission format instructions utilized on the first  
9 computer system are received from the second computer system, i.e. the United Website.

10 20. A United reservations sales agent can book a flight for a customer who calls a  
11 United reservation center such as the one in Chicago, Illinois or in the Philippines. Alternatively, a  
12 third-party travel agent such as one working at Liberty Travel can book a flight for a customer who  
13 calls a travel agency. The sales or travel agent can enter customer information including the city,  
14 date and time of the departing flight, and the city, date and time of the return flight into HTML form  
15 elements displayed on the web page found at <http://www.united.com/> of the Website to make the  
16 flight reservation and/or ticket purchase for the customer. The foregoing information entered into  
17 the computerized form document on the first computer system is extracted according to content  
18 instructions, and then transmitted to an application program running on the second computer  
19 system, i.e., the United Website, in a format and using a protocol required by the application  
20 program, in order to process the reservation and/or sale.

21  
22 21. Plaintiff Glory alleges that United is infringing claims 1, 3-4, 6-7, 9-10, 12-13, 15-  
23 16, 18-19, 21-22, 24-25 and 27-28 of the '768 Patent.

24 22. Plaintiff, Glory, has been damaged by such infringing activities by the Defendant of  
25 the ‘768 patent and will be irreparably harmed unless such infringing activities are enjoined by this  
26 Court.  
27  
28

**COUNT THREE**

1  
2 23. Plaintiff, Glory, repeats and incorporates herein the entirety of the allegations  
3 contained in paragraphs 1 through 22 above.

4 24. Defendant United has for a long time past and still is infringing in this judicial  
5 district the '007 patent by, among other things, processing information on the website at  
6 [www.united.com](http://www.united.com) ("United Website") pursuant to a claim of the '007 patent, without permission  
7 from Glory, in which information not derived from a scanned hard copy is extracted from a  
8 computerized form document displayed on a first computer system according to content instructions  
9 and transmitted to an application program operating on a second computer system, i.e., the United  
10 Website, according to customizable transmission format instructions in a manner defined by the  
11 claims of the '007 patent.  
12

13 25. The content instructions and transmission format instructions utilized on the first  
14 computer system are received from the second computer system, i.e., the United Website.

15 26. A United reservations sales agent can book a flight for a customer who calls a  
16 United reservation center such as the one in Chicago, Illinois or in the Philippines. Alternatively, a  
17 third-party travel agent such as one working at Liberty Travel can book a flight for a customer who  
18 calls a travel agency. The sales or travel agent can enter customer information including the city,  
19 date and time of the departing flight, and the city, date and time of the return flight into HTML form  
20 elements displayed on the web page found at <http://www.united.com/> of the Website to make the  
21 flight reservation and/or ticket purchase for the customer. The foregoing information entered into  
22 the computerized form document on the first computer system is extracted according to content  
23 instructions, and then transmitted to an application program running on the second computer  
24 system, i.e., the United Website, in a format and using a protocol required by the application  
25 program, in order to process the reservation and/or sale.  
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**DEMAND FOR JURY TRIAL**

The Plaintiff, Glory, demands a trial by jury of all issues properly triable by jury in this action.

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Licensing LLC

Dated: April 14, 2011  
Westfield, NJ