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*Attorneys for JEDI TECHNOLOGIES, INC.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

JEDI TECHNOLOGIES, INC., an  
Arizona corporation,

Plaintiff,

vs.

SPEEDDATE.COM, INC., a Delaware  
corporation,

Defendant.

Case No.

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

Plaintiff Jedi Technologies, Inc. complains of Defendant SpeedDate.com, Inc. as follows:

**NATURE OF CASE**

1. This is a claim for patent infringement that arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original jurisdiction over the subject matter of this claim under 28 U.S.C. §§ 1331 and 1338(a).

**PARTIES**

2. Jedi Technologies, Inc. ("Jedi Technologies") is an Arizona corporation that has a principal place of business at 11353 East Chuckwagon Circle, Tucson, Arizona, 85749. Jedi Technologies is a privately held technology company that is involved in the



1           8.     SpeedDate has provided and/or continues to provide its interactive online  
2 dating service via its [www.speeddate.com](http://www.speeddate.com) website to numerous website members that are  
3 residents of Tucson, Arizona, including the following exemplary display names: Renee,  
4 age 27; Alli, age 27; misty, age 30; Carla, age 23; Shirley, age 35; tabitha, age 30; Janie,  
5 age 26; Stephanie, age 24; Amanda, age 35; Rhonda, age 28; Jere, age 24; milly, age 32;  
6 Maria, age 33; indpndnt, age 36; dea, age 39; Carolyn, age 25; ANTOINETTE, age 30;  
7 tanidra, age 30; Victoria, age 23; Ana, age 36; Cauline, age 36; Turquoise, age 27;  
8 Michelle, age 37; clumsyroyalty, age 22; and babygirl89735, age 41; and others.

9  
10           9.     SpeedDate has provided and/or continues to provide interactive online  
11 speed dates to its website members, including residents of Tucson, Arizona, through its  
12 [www.speeddate.com](http://www.speeddate.com) website.

13           10.    SpeedDate has e-mailed and/or continues to email its website members,  
14 including residents of Tucson, Arizona, to solicit their participation in interactive online  
15 speed dates with other website members that SpeedDate hosts through its  
16 [www.speeddate.com](http://www.speeddate.com) website.

17           11.    SpeedDate has solicited and/or continues to solicit upgraded, paid  
18 memberships to its website members, including residents of Tucson, Arizona, for \$15.95  
19 per month, payable by Visa, Mastercard, Discover, Amex, JCB or Paypal, via its  
20 [www.speeddate.com](http://www.speeddate.com) website. For at least this reason, SpeedDate's online interaction  
21 with its website members, including residents of Tucson, Arizona, is commercial in  
22 nature.

23  
24           12.    SpeedDate is doing business in this judicial district, has purposefully  
25 availed itself of the privilege of conducting business in this judicial district, thereby  
26

1 invoking its benefits and protections, has established sufficient minimum contacts with  
2 the State of Arizona such that it should reasonably and fairly anticipate being brought  
3 into court in Arizona, and has purposefully reached out to and directed its activities at  
4 residents of Arizona. The patent infringement claims alleged herein arise out of or result  
5 from one or more of the foregoing activities.

6 13. Venue is proper in this district under 28 U.S.C. §§ 1391(b)-(d) and 1400(b).

### 7 **CLAIMS FOR PATENT INFRINGEMENT**

#### 8 **COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,401,098 C1**

9  
10 14. SpeedDate has infringed and continues to infringe at least claim 4 of the  
11 '098 Patent by, among other activities, making, using and/or conducting business through  
12 the social networking and online dating service website [www.speeddate.com](http://www.speeddate.com), including  
13 e-mailing its members to solicit further activity on the [www.speeddate.com](http://www.speeddate.com) website, in a  
14 manner which is covered by at least claim 4 of the '098 Patent in the United States  
15 pursuant to 35 U.S.C. § 271(a). SpeedDate has and continues to expand its afore-  
16 mentioned infringement to the mobile market by developing, providing, serving and  
17 supporting its SpeedDate.com Apple iPad and iPhone applications.

18 15. To the extent required by law, Jedi Technologies has complied with the  
19 provisions of 35 U.S.C. § 287 with respect to the '098 Patent.

20 16. The acts of infringement of the '098 Patent by SpeedDate have injured Jedi  
21 Technologies, and Jedi Technologies is entitled to recover damages adequate to  
22 compensate it for such infringement from SpeedDate, but, in no event less than a  
23 reasonable royalty. Further, the acts of infringement of the '098 Patent by SpeedDate  
24

1 have injured and will continue to injure Jedi Technologies unless and until this Court  
2 enters an injunction prohibiting further infringement of the '098 Patent.

3 **COUNT II – INFRINGEMENT OF U.S. PATENT NO. 7,885,977 B2**

4 17. SpeedDate has infringed and continues to infringe at least claims 1, 2 and 3  
5 of the '977 Patent by, among other activities, making, using and/or conducting business  
6 through the social networking and online dating service website [www.speeddate.com](http://www.speeddate.com),  
7 including accessing its members' Facebook accounts to collect data, in a manner which is  
8 covered by at least claims 1, 2 and 3 of the '977 Patent in the United States pursuant to 35  
9 U.S.C. § 271(a).

10  
11 18. To the extent required by law, Jedi Technologies has complied with the  
12 provisions of 35 U.S.C. § 287 with respect to the '977 Patent.

13 19. The acts of infringement of the '977 Patent by SpeedDate have injured Jedi  
14 Technologies, and Jedi Technologies is entitled to recover damages adequate to  
15 compensate it for such infringement from SpeedDate, but, in no event less than a  
16 reasonable royalty. Further, the acts of infringement of the '977 Patent by SpeedDate  
17 have injured and will continue to injure Jedi Technologies unless and until this Court  
18 enters an injunction prohibiting further infringement of the '977 Patent.

19 WHEREFORE, Plaintiff Jedi Technologies respectfully asks this Court to enter  
20 judgment against Defendant SpeedDate.com, Inc. and against its subsidiaries, successors,  
21 parents, affiliates, officers, directors, agents, servants, employees, and all persons in  
22 active concert or participation with them, jointly and severally, granting the following  
23 relief:  
24  
25  
26



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*Pro hac vice applications pending*

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INC.*