

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>CASHEDGE, INC,</b>	)	
	)	
<b>Plaintiff</b>	)	
	)	
<b>v.</b>	)	<b>C. A. No.</b>
	)	
<b>YODLEE, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	<b>JURY TRIAL DEMANDED</b>
	)	
	)	
	)	
	)	

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff CashEdge, Inc. ("CashEdge"), by and through its attorneys, alleges as and for its complaint against Defendant Yodlee, Inc. ("Yodlee") as follows:

**THE PARTIES**

1. CashEdge is a corporation organized and existing under the laws of the State of Delaware having its principal place of business at 104 Fifth Avenue, New York, NY 10011.
2. Upon information and belief, Yodlee is a corporation organized and existing under the laws of the State of Delaware having its principal place of business at 3600 Bridge Parkway, Suite 200, Redwood City, CA 94065-1170.

**JURISDICTION AND VENUE**

3. This is an action for patent infringement arising under the patent laws of the United States, Title 35, United States Code. This Court has jurisdiction over the causes of action stated herein pursuant to 35. U.S.C. § 101 et seq. and 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Yodlee because it is incorporated in the state of Delaware.

5. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b).

**THE PATENT**

6. CashEdge is the owner of all right, title, and interest in and to United States Patent No. 7,013,310 (the “’310 patent”), entitled Method And Apparatus For Retrieving And Processing Data, which was duly and legally issued by the United States Patent and Trademark Office on March 14, 2006. A copy of the ‘310 patent is attached hereto as Exhibit A.

**COUNT ONE: PATENT INFRINGEMENT**

7. Plaintiff CashEdge re-alleges and incorporates by reference Paragraphs 1-6 of this Complaint as if fully set forth herein.

8. Yodlee has infringed and continues to infringe one or more claims of the ‘310 patent by making, using, offering for sale, and selling in the United States data aggregation products, services, solutions, applications and techniques which utilize methods and apparatus for retrieving and processing data that embody the claimed inventions of the ‘310 patent, including but not limited to Yodlee’s OnCenter and Funds Transfer for Personal Financial Management, BillDirect and CardDirect for Electronic Bill Payment & Presentment, AdvisorView for Wealth Management, Instant Account Verification for Risk Management, and InsideView for Market Research.

9. Yodlee has induced and continues to induce others to infringe, and/or has committed and continues to commit acts of contributory infringement of one or more claims of the ‘310 patent.

10. On information and belief, Yodlee has had and continues to have knowledge of the ‘310 patent.

11. As a result of Yodlee's infringement, CashEdge has suffered and continues to suffer monetary damages in an amount yet to be determined because of the above-described acts of infringement of the '310 patent and will continue to suffer damages in the future unless Yodlee's infringing activities are enjoined by this Court.

12. CashEdge is entitled to damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for the infringement of the '310 patent.

13. Unless infringement of the '310 patent by Yodlee, its agents, servants, employees, attorneys, representatives, and all others acting on its behalf is preliminarily and permanently enjoined, CashEdge will be greatly and irreparably harmed.

**PRAYER FOR RELIEF**

**WHEREFORE**, CashEdge respectfully requests for judgement against Yodlee as follows:

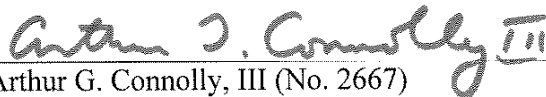
- (a) That Yodlee has infringed the '310 patent;
- (b) Awarding CashEdge damages for Yodlee's infringement;
- (c) Preliminarily and permanently enjoining Yodlee, its agents, servants, employees, attorneys, representatives, and all others acting on its behalf and all those persons in active concert or participation with it from infringing the '310 patent;
- (d) Declaring this an exceptional case under 35 U.S.C. § 285 and awarding CashEdge its costs, expenses and attorneys fees in this action; and
- (e) Awarding CashEdge such further relief as this Court may deem proper.

**JURY DEMAND**

CashEdge hereby demands a trial by jury of all issues in this action.

Dated: March 14, 2006

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