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UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY

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Attorneys for Plaintiff Eon-Net, L.P.

EON-NET, L.P.,  
  
Plaintiff,  
  
v.  
  
COOLANIMALSTUFF.COM,  
  
Defendant.

Case No.: \_\_\_\_\_

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

Plaintiff, Eon-Net, L.P., a limited partnership (hereinafter referred to as “Eon-Net”),  
demands a jury trial and complains against the defendant as follows:

**THE PARTIES**

1. Eon-Net is a limited partnership organized and existing under the laws of the  
Cayman Islands, with its principal place of business at P.O. Box 116, Road Town, Tortola, British  
Virgin Islands.

2. Upon information and belief, CoolAnimalStuff.com (hereinafter referred to as  
”Defendant” or “CoolAnimal”) is a business organized and existing under the laws of the State of  
Washington, having a place of business at 2815 2<sup>nd</sup> Avenue, Suite 103, Seattle, Washington 98121.

1 **JURISDICTION AND VENUE**

2 3. This action arises under the patent laws of the United States of America, Title 35 of  
3 the United States Code. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and  
4 1338(a).

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

7 5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

8 **CLAIM FOR PATENT INFRINGEMENT**

9 6. Plaintiff, Eon-Net, repeats and incorporates herein the entirety of the allegations  
10 contained in paragraphs 1 through 5 above.

11 7. On January 27, 2004, U.S. Patent No. 6,683,697 (hereinafter referred to as “the ‘697  
12 patent”) was duly and legally issued to Eon-Net for an invention entitled “Information Processing  
13 Methodology.” A copy of the ‘697 patent is attached to this Complaint as Exhibit 1.

14 8. Eon-Net is the owner of all right, title and interest in and to the ‘697 patent by way  
15 of Assignment from Millennium.  
16

17 **COUNT ONE**

18 9. Plaintiff, Eon-Net, repeats and incorporates herein the entirety of the allegations  
19 contained in paragraphs 1 through 8 above.

20 10. CoolAnimalStuff.com has for a long time past and still is infringing, actively  
21 inducing the infringement of and contributorily infringing in this judicial district, the ‘697 patent by,  
22 among other things, collecting information over the Internet pursuant to a claim of the ‘697 patent, and  
23 deploying for Defendant’s own use an application distributed over the Internet in which information is  
24 collected and extracted from a customer of Defendant and processed on Defendant’s server as defined by  
25 the claims of the ‘697 patent without permission from Eon-Net and will continue to do so unless  
26 enjoined by this Court.  
27  
28



- 1 F. A judgment that the Defendant is a willful infringer and an award of treble damages
- 2 to the Plaintiff, Eon-Net, pursuant to 35 U.S.C. §284 against the Defendant,
- 3 CoolAnimalStuff.com;
- 4 G. Award of reasonable attorney's fees to the Plaintiff, Eon-Net, pursuant to 35 U.S.C.
- 5 §285;
- 6 H. Award of Eon-Net's costs and expenses; and
- 7 I. Such other and further relief as this Court may deem proper, just and equitable.
- 8

9 **DEMAND FOR JURY TRIAL**

10 The Plaintiff, Eon-Net, demands a trial by jury of all issues properly triable by jury in this  
11 action.

12 By: /s/Jean-Marc Zimmerman  
13 Jean-Marc Zimmerman (JZ 7743)  
14 Zimmerman, Levi & Korsinsky, LLP  
15 226 St. Paul Street  
16 Westfield, NJ 07090  
17 Attorneys for Plaintiff Eon-Net, L.P.

18 Dated: February 4, 2005  
19 Westfield, NJ