

FILED

OCT - 7 2005

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE LINDBERG

ABLAISE LTD. and GENERAL
INVENTIONS INSTITUTE A, INC.,

Plaintiffs,

v.

CDW CORPORATION,

Defendant.

Civil Action No.:

050 5799

JURY TRIAL DEMANDED

MAGISTRATE JUDGE DENLOW

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs, Ablaise Ltd. ("Ablaise") and General Inventions Institute A, Inc. ("GIIA") (Ablaise and GIIA are collectively referred to herein as "Plaintiffs"), complain of defendant CDW Corporation ("CDW") as follows:

1. This is a claim for patent infringement and 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 complaint under 28 U.S.C. § 1338(a).
2. Ablaise is a British corporation.
3. GIIA is a British Virgin Islands corporation.
4. CDW is an Illinois corporation having a place of business at 200 N. Milwaukee Ave., Vernon Hills, Illinois 60061.
5. Plaintiffs own and have standing to sue for infringement of United States Patent No. 6,295,530 ("the '530 patent") (Ex. A), entitled, "Internet Service of Differently Formatted Viewable Data Signals Including Commands for Browser Execution."

6. The '530 patent was duly and legally issued by the United States Patent and Trademark Office on September 25, 2001.

7. CDW has infringed one or more claims of the '530 patent by making, using, and operating its cdw.com website throughout the United States, including this judicial district.

8. CDW has continued to engage in its infringing activities even after receiving notice of the '530 patent and its infringement of the patent.

9. CDW's infringement of the '530 patent will continue unless enjoined by this Court.

10. Plaintiffs have been damaged by the infringing acts of CDW.

11. Plaintiffs will continue to be damaged unless and until CDW is restrained from its infringing acts by this Court.

WHEREFORE, Plaintiffs demand judgment against CDW, including CDW's affiliates, officers, agents, servants, employees, and all persons in active concert or participation with them, as follows:

A. A preliminary and permanent injunction prohibiting CDW from further acts of infringement of the '530 patent;

B. An award to Plaintiffs of such damages as it shall prove at trial against CDW, after a full accounting of all damages that Plaintiffs have suffered as a result of CDW's unlawful conduct, said damages to be no less than a reasonable royalty;

C. An award to Plaintiffs of all damages so determined for willful infringement, in accordance with 35 U.S.C. § 284, together with prejudgment interest;

D. A determination that this case is exceptional within the meaning of 35

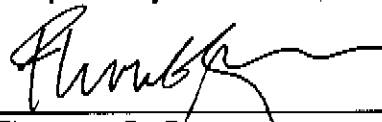
U.S.C. § 285, and an award to Plaintiffs of the costs of this action and reasonable attorneys' fees; and

E. Such other relief as this Court and/or a jury may determine to be proper and just.

JURY DEMAND

Plaintiffs hereby demand a jury trial on all issues triable to a jury in this case.

Respectfully submitted,



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