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MAY 12 2006
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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

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

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

Plaintiffs,

v.

LYCOS, INC.,

Defendant.

06CV2666

JUDGE HOLDERMAN

MAG. JUDGE LEVIN

JURY TRIAL DEMANDED

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 Lycos, Inc. ("Lycos") 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. Lycos is a Virginia corporation having a place of business at 100 5th Avenue, Waltham, Massachusetts 02451-8703.

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" and United

States Patent No. 6,961,737 ("the '737 patent") (Ex. B), entitled, "Serving Signals."

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

7. The '737 patent was duly and legally issued by the United States Patent and Trademark Office on November 1, 2005.

8. Lycos has infringed one or more claims of the '530 patent and the '737 patent by making, using, and operating its lycos.com and related websites throughout the United States, including this judicial district.

9. Lycos has continued to engage in its infringing activities even after receiving notice of, at least, the '737 patent and its infringement of such patents.

10. Lycos' infringement of the '530 patent and the '737 patent will continue unless enjoined by this Court.

11. Plaintiffs have been damaged by the infringing acts of Lycos.

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

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

A. A preliminary and permanent injunction prohibiting Lycos from further acts of infringement of the '530 patent and the '737 patent;

B. An award to Plaintiffs of such damages as they shall prove at trial against Lycos, after a full accounting of all damages that Plaintiffs have suffered as a result of Lycos' 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;

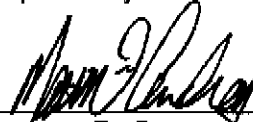
D. A determination that this case is exceptional within the meaning of 35 U.S.C. § 285, and an award to Plaintiffs of the costs of this action and reasonable attorneys' fees; and

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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