

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
(Central Division)**

VOICE DOMAIN TECHNOLOGIES, LLC,

Plaintiff,

v.

ZOOM CORPORATION,

Defendant.

Civil Case No.

JURY TRIAL DEMANDED

PLAINTIFF'S COMPLAINT

Voice Domain Technologies, LLC ("Voice Domain") for its complaint against Zoom Corporation ("Zoom") alleges as follows:

JURISDICTION AND VENUE

1. This action arises under the patent laws of the United States and this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.
2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

PARTIES

3. Plaintiff Voice Domain Technologies, LLC is a Connecticut limited liability company with its principal place of business at 176 East Main Street, Suite 6, Westborough, Massachusetts 01581. Voice Domain is the assignee and owner of United States Patent No. 5,548,566 ("the '566 patent").
4. Upon information and belief, defendant Zoom is a corporation organized under the laws of Japan, headquartered at 4-4-3, Kanda-Surguadai, Chiyoda-Ku, Tokyo, 101-0062

Japan. Zoom sells products in the Commonwealth and derives revenue from the Commonwealth of Massachusetts.

FIRST CLAIM FOR RELIEF

5. The allegations of paragraphs 1 through 4 are incorporated herein as if fully set forth.
6. The '566 patent was duly issued by the United States Patent Office on August 20, 1996 to Bruce J. Barker and was assigned to Voice Domain.
7. Defendant Zoom has, and continues to, willfully infringe the '566 patent pursuant to 35 U.S.C. §§ 271(a), (b) and (c) by the manufacture, importation, sale or offer to sell various models of its voice recorder products.
8. Plaintiff has been and will continue to be irreparably damaged by the infringing acts of the defendants.

WHEREFORE, plaintiff prays that the Court enter Judgment granting the following relief:

- A. Adjudge that Zoom has infringed the '566 patent;
- B. Awarding monetary damages against Zoom together with interest as permitted by law;
- C. Awarding enhanced damages and attorneys' fees against Zoom for willful infringement; and
- D. Enjoining Zoom and its employees and agents from further infringement of the '566 patent.

DEMAND FOR JURY TRIAL

Plaintiff requests a trial by Jury for all issues so triable.

Dated: March 28, 2011

Bruce J Barker
VOICE DOMAIN TECHNOLOGIES LLC
176 East Main Street, Suite 6
Westborough, MA. 01581
(508) 366-3800

By /s/ Bruce J. Barker
Bruce J Barker
BBO No. 551102