

PARTIES

3. Plaintiff RARE DOMAINS.COM, LLC is a company organized under the laws of the State of Maryland and has a principal address of 6000 Marquette Terrace, Bethesda, MD 20817.

4. On information and belief, Defendant NAMEBOY is a subsidiary and/or trade name of Defendant NAME GOGH, INC. and has a principal place of business at P.O. Box 2136, White Salmon, WA 98672. On information and belief, Defendant Nameboy owns and operates an online business service permitting online users to seek registration of domain names. The service facilitates use of online forms that drive operation of a domain name suggestion system like the one owned and operated by the Plaintiff and which is covered by the patent in this suit.

PATENT INFRINGEMENT

5. The Plaintiff is a company that owns and operates an Internet based online storefront under the name BUYDOMAINS.COM(tm) (www.buydomains.com) that registers and sells Uniform Resource Locators ("URLs" also known as "domain names"). URLs are used to address content on the Internet and are mapped to physical, numerical addresses called Internet Protocol ("IP") Addresses. The Plaintiff is a registration agency that, on behalf of a customer, obtains registration of a domain name by paying a wholesale price to a primary/principal registration authority. The primary registration authority then posts a registration record in one of the Internet's primary domain name server databases such as those owned and operated by Verisign, Inc. To an online customer, such registration agency is transparent and his domain name registration is equivalent to a domain name that is registered directly by Plaintiff. However, the cost of registering a domain name via the

Plaintiff's online service is substantially less than the cost of registering directly with a primary registration authority.

6. The Plaintiff developed certain technology that facilitates the generation, sale, and registration of new domain names. This technology, NAMEFIND(tm) (the NAMEFIND(tm) service was formerly branded as WHOIS PLUS(tm)), permits customers who wish to register a domain name to enter desired terms/domain names into an online form. The NAMEFIND(tm) service determines whether the desired terms/domain names are available for registration. If not, NAMEFIND(tm) will arrange and/or combine those desired terms with other terms in order to produce domain name suggestions that are available for registration. The technology facilitating the NAMEFIND(tm) service includes computer programs that reside on back-end server computer systems operated by the Plaintiff. Printouts of certain computer screenshots related to operation of the NAMEFIND(tm) service are attached hereto at EXHIBITS 1 and 2.

7. To protect the Plaintiff's proprietary interest in its NAMEFIND(tm) technology, the Plaintiff sought patent protection on September 22, 1999. On October 2, 2001, U.S. Patent No. 6,298,341 ("341 Patent") entitled "System and method for generating domain names and for facilitating registration and transfer of same" assigned to the Plaintiff was issued by the U.S. Patent and Trademark Office based on U.S. Patent Application Serial No. 09/400,602 ("602 Application"). A copy of U.S. Patent No. 6,298,341 is attached hereto at EXHIBIT 3.

8. On information and Belief, Defendant NAMEBOY owns and operates a domain name registration service where domain name suggestions are offered to customers. The

Defendant's domain name registration service is located online at www.Nameboy.Com.

Screen-shots depicting Defendant's online service are attached hereto at EXHIBIT 4.

16. The Defendant has infringed, and continues to infringe the '341 Patent by developing, providing, marketing, and using its online domain name registration services, nationally and internationally, including in this Judicial District.

17. The Defendant's infringement of the '341 Patent has caused and continues to cause substantial damage to the Plaintiff. The Plaintiff seeks injunctive relief pursuant to 35 U.S.C. § 283 as well as appropriate damages adequate to compensate Plaintiff for the Defendant's infringement pursuant to 35 U.S.C. § 284, together with interest and costs as determined by this Court. Additionally, pursuant to 35 U.S.C. § 285, the Plaintiff seeks a finding that this case is exceptional and one that warrants an award of enhanced damages and reasonable attorneys' fees to the Plaintiff.

18. Upon information and belief, the Defendant will continue to infringe the '341 Patent unless enjoined and restrained by this Court.

WHEREFORE, the Plaintiff, RARE DOMAINS.COM, LLC, demands judgment against the Defendant, NAMEBOY, and prays that:

- (a) this Court find the '341 Patent to be valid and infringed;
- (b) a preliminary and permanent injunction be issued enjoining the Defendant, its officers, agents, and employees from infringing, inducing or contributing to the infringement of the '341 Patent;
- (c) the Plaintiff be awarded damages against the Defendant in an amount adequate to compensate for infringement of the '341 Patent, and that such damages when ascertained be

trebled and/or enhanced, and awarded to the Plaintiff together with prejudgment and post judgment interest;

(d) the Plaintiff be awarded its costs and attorney's fees; and

(e) the Plaintiff be awarded all such further and additional relief as this Court deems just and proper.

JURY DEMAND

The Plaintiff hereby requests a trial by jury on all triable issues concerning this Complaint.

Date: August 14, 2003

Respectfully submitted,

JOSEPH, GREENWALD & LAAKE, P.A.

By: _____

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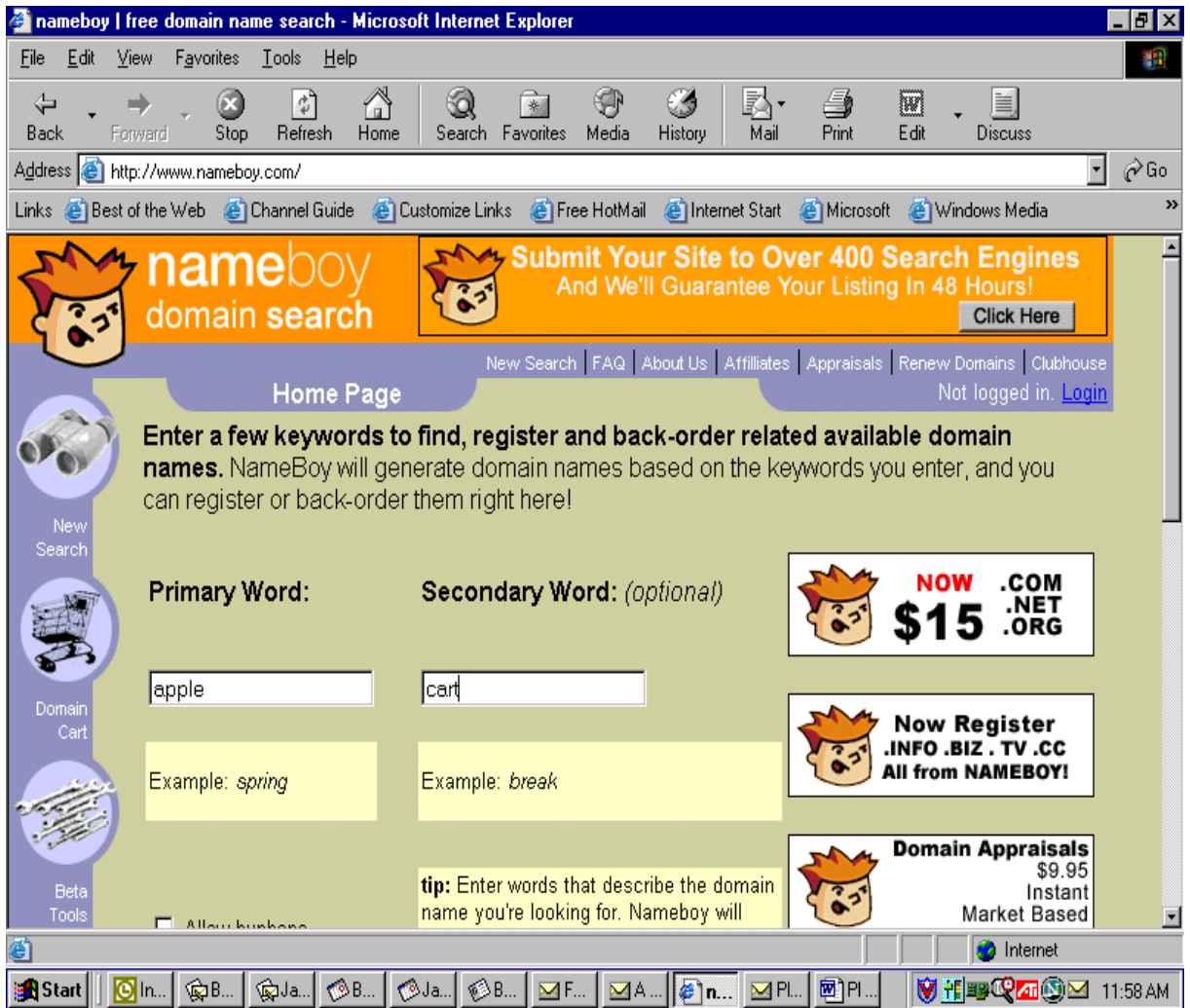


EXHIBIT 4

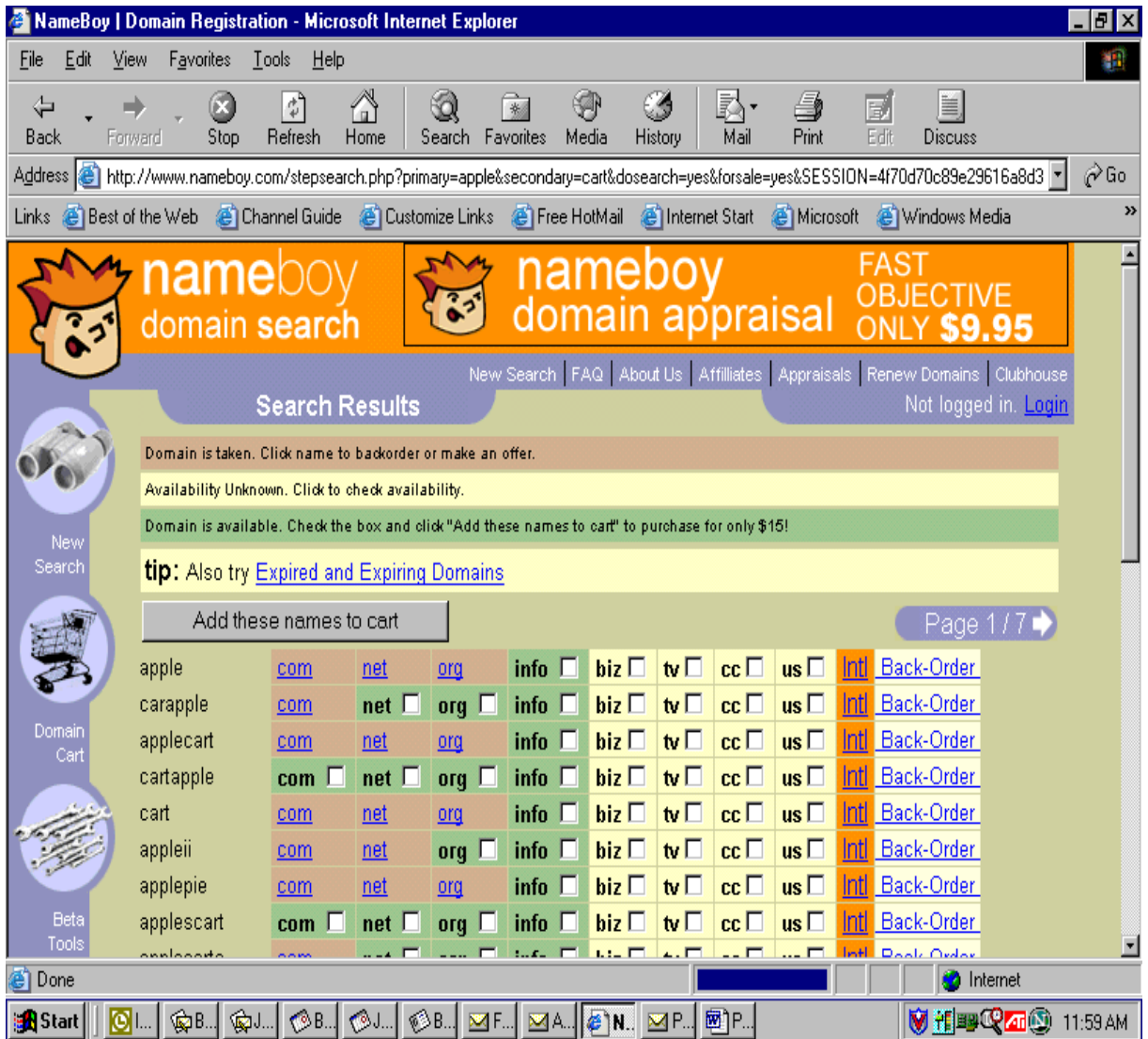


EXHIBIT 4