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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

OLYMPIC DEVELOPMENTS AG,  
LLC,

Plaintiff,

v.

VALVE CORPORATION,

Defendant.

No. 2:11-cv-00392-RSM

**ORIGINAL COMPLAINT FOR  
PATENT INFRINGEMENT**

Jury Trial Demanded

**PLAINTIFF’S ORIGINAL COMPLAINT**

Plaintiff Olympic Developments AG, LLC (“Plaintiff”), by and through its undersigned counsel, files this Original Complaint against Valve Corporation (“Defendant”) as follows:

**NATURE OF THE ACTION**

1. This is a patent infringement action to stop Defendant’s infringement of Plaintiff’s United States Patent No. 5,475,585 entitled “*Transactional Processing System*” (the “’585 patent”; a copy of which is attached hereto as Exhibit A) (“the patent-in-suit”). Plaintiff is the exclusive licensee of the ’585 patent with respect to the Defendant. Plaintiff seeks injunctive relief and monetary damages.

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3 **PARTIES**

4 2. Plaintiff is a limited liability company organized and existing under the  
5 laws of the State of Delaware. Plaintiff maintains its principal place of business at 1000  
6 North West Street, Suite 1200, Wilmington, DE 19801. Plaintiff is the exclusive licensee  
7 of the '585 patent with respect to the Defendant, and possesses the right to sue for  
infringement and recover past damages.

8 3. Upon information and belief, Valve Corporation ("Valve") is a corporation  
9 organized and existing under the laws of the State of Washington, with its principal place  
10 of business located at 8411 Preston Road, Suite 650, Dallas, Texas 75225.

11 **JURISDICTION AND VENUE**

12 4. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1  
13 *et seq.*, including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This Court has subject matter  
14 jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

15 5. The Court has personal jurisdiction over Defendant because: Defendant is  
16 present within or has minimum contacts with the State of Washington and the Western  
17 District of Washington; Defendant has purposefully availed itself of the privileges of  
18 conducting business in the State of Washington and in the Western District of Washington;  
19 Defendant has sought protection and benefit from the laws of the State of Washington;  
20 Defendant regularly conducts business within the State of Washington and within the  
21 Central District of Washington; and Plaintiff's causes of action arise directly from  
22 Defendant's business contacts and other activities in the State of Washington and in the  
23 Western District of Washington.

24 6. More specifically, Defendant, directly and/or through authorized  
25 intermediaries, ships, distributes, offers for sale, sells, and/or advertises (including the  
26 provision of an interactive web page) its products and services in the United States, the

1 State of Washington, and the Western District of Washington. Upon information and  
2 belief, Defendant has committed patent infringement in the State of Washington and in the  
3 Western District of Washington. Defendant solicits customers in the State of Washington  
4 and in the Western District of Washington. Defendant has many paying customers who  
5 are residents of the State of Washington and the Western District of Washington and who  
6 each use Defendant's products and services in the State of Washington and in the Western  
7 District of Washington.

8 7. Venue is proper in the Western District of Washington pursuant to 28  
9 U.S.C. §§ 1391 and 1400(b).

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11 **COUNT I – PATENT INFRINGEMENT**

12 8. The '585 patent was duly and legally issued by the United States Patent and  
13 Trademark Office on December 12, 1995, after full and fair examination for systems and  
14 methods for purchasing products over a network. Plaintiff is the exclusive licensee of the  
15 '585 patent with respect to the Defendant, and possesses all rights of recovery under the  
16 '585 patent with respect to the Defendant, including the right to sue for infringement and  
17 recover past damages.

18 9. Plaintiff is informed and believes that Valve owns, operates, advertises,  
19 controls, sells, and otherwise provides software and websites for "online game services"  
20 including via the Valve Steam client ("the Valve software") and Steam Store ("the Valve  
21 website"), both available through www.steampowered.com. Upon information and belief,  
22 Valve has infringed and continues to infringe one or more claims of the '585 patent by  
23 making, using, providing, offering to sell, and selling (directly or through intermediaries),  
24 in this district and elsewhere in the United States, systems and methods for purchasing  
25 products and services and processing corresponding financial transactions, including via  
26 the Valve website and Valve software. More particularly, Plaintiff is informed and

1 believes that Valve has and/or requires and/or directs users to access and/or view and/or  
2 purchase products from a remote programming system at the Steam Store via a Steam  
3 software client in a manner claimed in the '585 patent.

4 10. Defendant's aforesaid activities have been without authority and/or license  
5 from Plaintiff.

6 11. Plaintiff is entitled to recover from the Defendant the damages sustained by  
7 Plaintiff as a result of the Defendant's wrongful acts in an amount subject to proof at trial,  
8 which, by law, cannot be less than a reasonable royalty, together with interest and costs as  
9 fixed by this Court under 35 U.S.C. § 284.

10 12. Defendant's infringement of Plaintiff's exclusive rights under the '585  
11 patent will continue to damage Plaintiff, causing irreparable harm for which there is no  
12 adequate remedy at law, unless enjoined by this Court.

13 **JURY DEMAND**

14 13. Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal  
15 Rules of Civil Procedure.

16 **PRAAYER FOR RELIEF**

17 Plaintiff respectfully requests that the Court find in its favor and against Defendant,  
18 and that the Court grant Plaintiff the following relief:

- 19 A. An adjudication that one or more claims of the '585 patent have been  
20 infringed, either literally and/or under the doctrine of equivalents, by  
21 Defendant;
- 22 B. An award to Plaintiff of damages adequate to compensate Plaintiff for the  
23 Defendant's acts of infringement together with pre-judgment and post-  
24 judgment interest;
- 25  
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- C. A grant of permanent injunction pursuant to 35 U.S.C. § 283, enjoining the Defendant from further acts of infringement with respect to the claims of the '585 patent;
- D. That this Court declare this to be an exceptional case and award Plaintiff its reasonable attorneys' fees and costs in accordance with 35 U.S.C. §285; and
- E. Any further relief that this Court deems just and proper.

Date: April 11, 2011

/s/Steven W. Ritcheson  
 Steven W. Ritcheson *pro hac vice application to be filed*  
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