

Texas. They may be served through their registered agent CT Corporation System at 350 N. St. Paul Street, Dallas, Texas 75201.

Jurisdiction & Venue

4. This action arises under the patent statutes of the United States, 35 U.S.C. § 271 et seq. Accordingly, the Court has federal question jurisdiction over this matter under 28 U.S.C. §§ 1331 and 1338(a).

5. The court has specific and general jurisdiction over each defendant.

6. Venue is properly within this district in accordance with 28 U.S.C. § 1391 (b) and (c) and § 1400 (b).

Facts and Background

The Transocean Patents

7. On April 11, 2000, United States Patent No. 6,047,781 (the “‘781 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘781 Patent is attached as Exhibit A and incorporated herein.

8. On May 2, 2000, United States Patent No. 6,056,071 (the “‘071 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘071 Patent is attached as Exhibit B and incorporated herein.

9. On May 30, 2000, United States Patent No. 6,068,069 (the “‘069 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘069 Patent is attached as Exhibit C and incorporated herein.

10. On July 11, 2000, United States Patent No. 6,085,851 (the “851 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drill Method and Apparatus. A copy of the ‘851 Patent is attached as Exhibit D and incorporated herein.

11. Collectively, the above-mentioned patents are the Transocean patents. Transocean owns the Transocean patents by assignment dated March 9, 2004.

Noble Infringes the Transocean Patents

12. Around June 2003, British Petroleum Amoco (“BP”) received bids for its deep water oil field development project in the Gulf of Mexico called the Atlantis Project.

13. On information and belief, Noble submitted a bid on the Atlantis Project.

14. On information and belief, Noble’s Atlantis Project bid was for a dual activity semisubmersible drilling unit called the Noble Clyde Boudreaux.

15. On information and belief, Noble negotiated and contracted with Shell Exploration & Production Company (“Shell”) around December 2004 to provide a dual activity semisubmersible drilling unit called the Noble Clyde Boudreaux for dual activity drilling operation in the US territorial waters of the Gulf of Mexico.

16. On information and belief, Noble is currently upgrading the Noble Clyde Boudreaux in Mississippi in accord with the Shell contract to include a dual activity drilling design covered by the Transocean patents.

17. Transocean notified Noble of its infringing activities by letters dated July 29, 2003 and August 4, 2005.

Count 1: Patent Infringement

18. Transocean adopts and incorporates by reference the allegations set forth in the paragraphs 1-19.

19. On information and belief, defendant Noble infringes the claims in the Transocean patents by offering for sale and selling the use of the Noble Clyde Boudreaux within the Southern District of Texas for use in the U.S. Territorial waters of the Gulf of Mexico.

20. On information and belief, Noble also infringes the claims of the Transocean patents by making an infringing structure within the United States through its upgrade of the Noble Clyde Boudreaux.

21. Noble will continue to infringe the claims in the Transocean patents unless enjoined by this Court.

22. Transocean has been damaged and will continue to be damaged by Noble's infringing acts.

23. On information and belief, Noble was actually aware of the Transocean patents and willfully committed acts of infringement.

Jury Demand

24. Transocean demands a trial by jury.

Prayer for Relief

WHEREFORE, Transocean prays the Court to:

- (a) grant a permanent injunction against Noble's continued infringement;
- (b) award damages of not less than a reasonable royalty;
- (c) find that Noble's infringement has been willful and under 35 U.S.C. § 284 and increase such damages to three times the awarded amount;
- (d) award prejudgment and postjudgment interest;
- (e) find that this case is an exceptional case under 35 U.S.C. § 285 and award attorneys' fees;
- (f) award costs; and

(g) grant all other relief to which Transocean is entitled.

Date: February 16, 2007

Respectfully submitted,

/s/Charles B. Walker, Jr.
Charles B. Walker, Jr.
State Bar No. 00794808
S.D. Tex. Bar No. 19307
1301 McKinney, Suite 5100
Houston, Texas 77010-3095
Telephone: 713/651-5203
Facsimile: 713/651-5246
Email: cwalker@fulbright.com

Attorney-in-Charge for Plaintiff

OF COUNSEL:
Winn D. Carter
State Bar No. 03932950
S.D. Tex. Bar No. 2934
Michael S. McCoy
State Bar No. 24013129
S.D. Tex. Bar No. 24498
FULBRIGHT & JAWORSKI L.L.P.
1301 McKinney, Suite 5100
Houston, Texas 77010-3095
Telephone: 713/651-5151
Facsimile: 713/651-5246