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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Jean-Marc Zimmerman (JZ 7743)
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Attorneys for Plaintiff Eon-Net, L.P.

EON-NET, L.P.

Plaintiff,

v.

SONY CORPORATION OF AMERICA,

Defendant.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Plaintiff, Eon-Net, L.P., a limited partnership (hereinafter referred to as “Eon-Net”), demands a jury trial and complains against the defendant as follows:

THE PARTIES

1. Eon-Net is a limited partnership organized and existing under the laws of the British Virgin Islands, with its principal place of business at P.O. Box 116, Road Town, Tortola, British Virgin Islands.

2. Upon information and belief, Sony Corporation of America (hereinafter referred to as “Defendant” or “Sony”) is a business organized and existing under the laws of the State of Delaware, having a place of business in this district at Sony Drive, Park Ridge, New Jersey 07656.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States of America, Title 35 of the United States Code. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and 1338(a).

1 4. Upon information and belief, Defendant is doing business and committing
2 infringements in this judicial district and is subject to personal jurisdiction in this judicial district.

3 5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

4 **CLAIM FOR PATENT INFRINGEMENT**

5 6. Plaintiff, Eon-Net, repeats and incorporates herein the entirety of the allegations
6 contained in paragraphs 1 through 5 above.

7 7. On January 27, 2004, U.S. Patent No. 6,683,697 (hereinafter referred to as “the ‘697
8 patent”) was duly and legally issued to Millennium, L.P. (“Millennium”) for an invention entitled
9 “Information Processing Methodology.” On October 14, 2004, Millennium assigned the ‘697 patent
10 to Eon-Net. A Certificate of Correction to the ‘697 patent issued on July 26, 2005. A copy of the
11 ‘697 patent and the Certificate of Correction are attached to this Complaint as Exhibit 1.
12

13 8. Eon-Net is the owner of all right, title and interest in and to the ‘697 patent.

14 9. On July 11, 2006, U.S. Patent No. 7,075,673 (hereinafter referred to as “the ‘673
15 patent”) was duly and legally issued to Eon-Net for an invention entitled “Information Processing
16 Methodology.” A copy of the ‘673 patent is attached to this Complaint as Exhibit 2.
17

18 10. Eon-Net is the owner of all right, title and interest in and to the ‘673 patent.

19 11. On February 27, 2007, U.S. Patent No. 7,184,162 (hereinafter referred to as “the
20 ‘162 patent”) was duly and legally issued to Eon-Net for an invention entitled “Information
21 Processing Methodology.” A copy of the ‘162 patent is attached to this Complaint as Exhibit 3.

22 12. Eon-Net is the owner of all right, title and interest in and to the ‘162 patent.

23 **COUNT ONE**

24 13. Plaintiff, Eon-Net, repeats and incorporates herein the entirety of the allegations
25 contained in paragraphs 1 through 12 above.

26 14. Sony has for a long time past and still is infringing, actively inducing the
27 infringement of and/or contributorily infringing in this judicial district, the ‘673 patent by, among
28

1 other things, operating a website at www.sony.com (“the Sony Website”) pursuant to a claim of the
2 ‘697 patent, without permission from Eon-Net, in which information entered by a Sony customer
3 into an electronic document template displayed on the browser of the customer’s computer is
4 extracted according to content instructions and transmitted to an application program operating on
5 Defendant’s web server according to customizable transmission format instructions in a manner
6 defined by the claims of the ‘697 patent. For example, a Sony customer seeking to purchase
7 product can enter information including their first and last name and address into HTML form
8 elements displayed on the web page found at
9 [https://www.sonystyle.com/webapp/wcs/stores/servlet/SYOrderCheckout?catalogId=10551&storeI
10 \[d=10151&langId=-1\]\(https://www.sonystyle.com/webapp/wcs/stores/servlet/SYOrderCheckout?catalogId=10551&storeId=10151&langId=-1\) of the Sony Website. The foregoing information entered into the HTML
11 forms is extracted by the browser and transmitted to an application program running on the Sony
12 web server for processing the customer’s order in a format and using a protocol required by the
13 application program.
14](https://www.sonystyle.com/webapp/wcs/stores/servlet/SYOrderCheckout?catalogId=10551&storeId=10151&langId=-1)

15 15. Plaintiff, Eon-Net, has been damaged by such infringing activities by the Defendant
16 of the ‘697 patent and will be irreparably harmed unless such infringing activities are enjoined by
17 this Court.
18

19 **COUNT TWO**

20 16. Plaintiff, Eon-Net, repeats and incorporates herein the entirety of the allegations
21 contained in paragraphs 1 through 15 above.

22 17. Sony has for a long time past and still is infringing, actively inducing the
23 infringement of and/or contributorily infringing in this judicial district, the ‘673 patent by, among
24 other things, operating the Sony Website pursuant to a claim of the ‘673 patent, without permission
25 from Eon-Net, in which information entered by a customer of Defendant into an electronic
26 document template displayed on the browser of the customer’s computer is extracted according to
27 content instructions and transmitted to an application program operating on Defendant’s web server
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1 according to customizable transmission format instructions in a manner defined by the claims of the
2 '673 patent. For example, a Sony customer seeking to purchase product can enter information
3 including their first and last name and address into HTML form elements displayed on the web page
4 found at
5 <https://www.sonystyle.com/webapp/wcs/stores/servlet/SYOrderCheckout?catalogId=10551&storeId=10151&langId=-1>
6 of the Sony Website. The foregoing information entered into the HTML
7 forms is extracted by the browser and transmitted to an application program running on the Sony
8 web server for processing the customer's order in a format and using a protocol required by the
9 application program.
10

11 18. Plaintiff, Eon-Net, has been damaged by such infringing activities by the Defendant
12 of the '673 patent and will be irreparably harmed unless such infringing activities are enjoined by
13 this Court.

14 **COUNT THREE**

15 19. Plaintiff, Eon-Net, repeats and incorporates herein the entirety of the allegations
16 contained in paragraphs 1 through 18 above.

17 20. Sony has for a long time past and still is infringing, actively inducing the
18 infringement of and/or contributorily infringing in this judicial district, the '162 patent by, among
19 other things, operating the Sony Website pursuant to a claim of the '162 patent, without permission
20 from Eon-Net, in which information entered by a customer of Defendant into an electronic
21 document template displayed on the browser of the customer's computer is extracted according to
22 content instructions and transmitted to an application program operating on Defendant's web server
23 according to customizable transmission format instructions in a manner defined by the claims of the
24 '162 patent. For example, a Sony customer seeking to purchase product can enter information
25 including their first and last name and address into HTML form elements displayed on the web page
26 found at
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1 <https://www.sonystyle.com/webapp/wcs/stores/servlet/SYOrderCheckout?catalogId=10551&storeId=10151&langId=-1>
2 of the Sony Website. The foregoing information entered into the HTML
3 forms is extracted by the browser and transmitted to an application program running on the Sony
4 web server for processing the customer's order in a format and using a protocol required by the
5 application program.

6 21. Plaintiff, Eon-Net, has been damaged by such infringing activities by the Defendant
7 of the '162 patent and will be irreparably harmed unless such infringing activities are enjoined by
8 this Court.
9

10 **PRAYER FOR RELIEF**

11 WHEREFORE, THE Plaintiff, Eon-Net prays for judgment against the Defendant Sony on
12 all the counts and for the following relief:

- 13 A. Declaration that the Plaintiff is the owner of the '697, '673 and '162 patents, and that
14 the Plaintiff has the right to sue and to recover for infringement thereof;
- 15 B. Declaration that each one of the '697, '673 and '162 patents are valid and
16 enforceable;
- 17 C. Declaration that the Defendant has infringed, actively induced infringement of,
18 and/or contributorily infringed each one of the '697, '673 and '162 patents;
- 19 D. A preliminary and permanent injunction against the Defendant, each of its officers,
20 agents, servants, employees, and attorneys, all parent and subsidiary corporations,
21 their assigns and successors in interest, and those persons acting in active concert or
22 participation with them, enjoining them from continuing acts of infringement, active
23 inducement of infringement, and contributory infringement of Eon-Net's '697, '673
24 and '162 patents;
- 25 E. An accounting for damages under 35 U.S.C. §284 for infringement of Eon-Net's
26 '697, '673 and '162 patents by the Defendant and the award of damages so
27 ascertained to the Plaintiff, Eon-Net, together with interest as provided by law;
- 28 F. Award of Eon-Net's costs and expenses; and

1 G. Such other and further relief as this Court may deem proper, just and equitable.

2 **DEMAND FOR JURY TRIAL**

3 The Plaintiff, Eon-Net, demands a trial by jury of all issues properly triable by jury in this
4 action.

5 By: /s/Jean-Marc Zimmerman
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12 Attorneys for Plaintiff Eon-Net, L.P.

10 Dated: January 4, 2009
11 Westfield, NJ

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