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RIPARIUS VENTURES LLC,)
Plaintiff,)) Civil Action No. 07-CV-00812
v.)
SKYPE TECHNOLOGIES S.A and RTX TELECOM A/S) Honorable Charles R. Norgle) Magistrate Judge Cole
Defendants.)

JURY TRIAL DEMANDED

AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, Riparius Ventures LLC ("Riparius"), complains of Defendants, Skype Technologies S.A. ("Skype"), and RTX Telecom A/S ("RTX") as follows:

- 1. This is a claim for patent infringement arising under the patent laws of the United States, Title 35, United States Code. This Court has exclusive jurisdiction over the subject matter under 28 U.S.C. § 1338(a).
- 2. Riparius Ventures LLC is a Maryland limited liability company. Riparius owns all right, title and interest in and has standing to sue for infringement of United States Patent Nos. 7,016,481 and 7,139,371, each entitled "Remote Internet Telephony Device."
- 3. Skype Technologies S.A. is an alien corporation organized under the laws of Luxembourg. According to Skype's Answer and Counterclaim in Net2Phone, Inc. v. eBay, Inc., and Skype Technologies S.A., Civil Action 2:06-CV-02469-KSH-PS, in the United States District Court for the District of New Jersey, Skype's address and principal place of business as of September 15, 2006 was at 15, rue Notre Dame, L-2240, Luxembourg. Skype does business in

this judicial district through the use of internet telephony services and the sale of products for such services.

- 4. RTX Telecom A/S is an alien corporation organized under the laws of Denmark, with its headquarters at Stroemmen 6, 9400 Noerresundby, Denmark. RTX does business in this judicial district through the use of internet telephony services and the sale of products for such services.
 - 5. Venue is proper in this district under 28 U.S.C. §§ 1391 and 1400(b).
- 6. The defendants have infringed the '481 and '371 patents in connection with the manufacture, importation, sale, offer for sale, and use of internet telephony devices. For example, the RTX Dualphone sold by Skype and others on the internet. RTX was given notice of the published application for the '371 patent, and its claims have not substantially changed. RTX was also given notice of its infringement of the '481 and '371 patents.
- 7. The infringement has injured Riparius, which is entitled to recover damages adequate to compensate it for the infringement, but in no event less than a reasonable royalty.
- 8. On information and belief, the infringement has been willful and deliberate and has injured and will continue to injure Riparius unless and until this Court enters an injunction prohibiting further infringement of the '481 and '371 patents.

WHEREFORE, Riparius respectfully demands judgment against Defendants and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

A. An award of damages adequate to compensate Riparius for the infringement that has occurred, together with prejudgment interest from the date infringement of the patent in suit began, including pre-issue damages pursuant to 35 U.S.C. § 154(d);

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B. Increased damages as permitted under 35 U.S.C. § 284;

C. A finding that this case is exceptional and an award to Plaintiff of its attorneys' fees and costs as provided by 35 U.S.C. § 285;

- D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the patents in suit; and,
 - E. Such other and further relief as this Court or a jury may deem proper and just.

JURY DEMAND

Riparius Ventures LLC demands a trial by jury on all issues so triable.

RIPARIUS VENTURES LLC

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CERTIFICATE OF SERVICE

I hereby certify that foregoing AMENDED COMPLAINT FOR PATENT INFRINGEMENT was filed today with the Clerk of the Court and was served upon the below-listed counsel of record by facsimile and first class mail. A copy of the documents filed today was hand-delivered to Judge Norgle's office in Room 2341 at 219 South Dearborn Street, Chicago, Illinois 60604.

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On October 29, 2007.

/s/ Joseph N. Hosteny