



accused of patent infringement herein, to resellers and distributors for purposes of resale to consumers in the State of New York, including this judicial district. Netgear knows or has reason to know that some of the customers who purchase and ultimately use the devices accused of patent infringement in this case reside in this judicial district.

29. This Court has personal jurisdiction over Netgear because, among other things, Netgear has engaged in the specific transaction of business in the State of New York, including advertising, promoting, selling and offering for sale products that infringe the patent-in-suit as described more particularly herein. Moreover, Netgear generally conducts business in New York so as to render it amenable to general jurisdiction. Because Netgear avails itself of the privilege of doing business in New York, the exercise of personal jurisdiction over Netgear is fair and reasonable. Venue is proper in this this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c) and §1400(b).

30. Netgear infringes one or more claims of the '530, '510, '360 and 7,016,368 patents in suit literally or under the Doctrine of Equivalents by manufacturing, advertising, promoting, selling, offering for sale and distributing products that infringe at least one claim of the above-referenced patents in suit.

31. SercoNet has been damaged as a result of the Netgear's acts of patent infringement, and will continue to be damaged unless such activities are enjoined by this Court.

32. As a result of these acts of patent infringement, SercoNet is entitled to recover damages from the Defendant, amounting to at least a reasonable royalty.

#### **PRAYER FOR RELIEF**

WHEREFORE, SercoNet prays for trial by jury, judgment and relief after entry of final verdict, including:

1. A judgment that Netgear has infringed at least one claim of the patents additional patents.
2. An injunction against Netgear's continued infringement of the additional patents pursuant to 35 U.S.C. § 283.
3. An award of damages resulting from Netgear's acts of patent infringement.
4. An assessment of interest on the damages so computed.
5. Such other and further relief as this Court deems just and appropriate.

Respectfully submitted,  
Dated: April 26<sup>th</sup>, 2006

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