

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ECLIPSE IP LLC,

Plaintiff,

vs.

MEETMOI LLC,

Defendant.

Case No.: 1:12-cv-2430

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Eclipse IP LLC (“Eclipse” or “Plaintiff”), by and through their undersigned attorneys, for their complaint against defendant MeetMoi LLC (“MeetMoi” or “Defendant”) hereby allege as follows:

NATURE OF LAWSUIT

1. This action involves claims for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. § 1338(a).

THE PARTIES

2. Eclipse is a corporation organized under the laws of Florida and having a principal business address at 115 NW 17th Street, Delray Beach, Florida 33444.

3. Eclipse owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 7,479,901 (“the ‘901 patent”), entitled “Mobile thing determination systems and methods based upon user-device location,” issued January 20, 2009. A copy of the ‘901 patent is annexed hereto as Exhibit A.

4. Eclipse owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 7,504,966 (“the ‘966 patent”), entitled “Response systems and methods for notification systems for modifying future notifications,” issued March 17, 2009. A copy of the ‘966 patent is annexed hereto as Exhibit B.

5. Defendant MeetMoi is a New York Limited Liability Company with a place of business at 520 Broadway, 10th Floor, New York, New York 10012. MeetMoi transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Illinois services that infringe claims of the ‘901 and ‘966 patents.

6. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).

DEFENDANT MEETMOI’S ACTS OF PATENT INFRINGEMENT

7. Defendant MeetMoi has infringed claims of the ‘901 and ‘966 patents through, among other activities, the use and sale of MeetMoi’s meetMoi mobile dating service.

8. Defendant MeetMoi’s infringement has injured and will continue to injure Eclipse unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the ‘901 and ‘966 patents.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs ask this Court to enter judgment against the Defendant, 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 Eclipse for the infringement that has occurred, together with prejudgment interest from the date that Defendant's infringement of the Eclipse patents began;
- B. Increased damages as permitted under 35 U.S.C. § 284;
- C. A finding that this case is exceptional and an award to Eclipse 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 Eclipse patents; and
- E. Such other and further relief as this Court or a jury may deem proper and just.

JURY DEMAND

Eclipse demands a trial by jury on all issues presented in this Complaint.

Dated: April 2, 2012

Respectfully submitted,

/s/ Anthony E. Dowell
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**ATTORNEYS FOR PLAINTIFF
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