



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

## II. FACTUAL BACKGROUND

7. United States Patent No. 6,625,582 B2 (“the ’582 patent”), entitled “Method and System for Converting a Designated Portion of Future Social Security and Other Retirement Payments to Current Benefits,” was duly and legally issued by the United States Patent and Trademark Office on September 23, 2003. Exhibit A is a true and correct copy of the ’582 patent.

8. Plaintiff Retirement Capital Access Management Company LLC is the owner by assignment of all rights, title, and interest in and to the ’582 patent.

9. Plaintiff Benefit Funding Systems LLC is the exclusive licensee of the ’582 patent.

10. Defendant has made, offered for sale, used, and/or caused to be used computerized systems and methods that embody or practice one or more claims covered by the ’582 patent within the United States. On information and belief, Defendant uses and causes to be used computerized services, such as those marketed under the phrase, “Checking Account Advance,” that involve, among other things, obtaining authorization to periodically withdraw a portion of future Social Security benefits, that are directly deposited into an account, in exchange for providing a monetary benefit based at least in part on the present value of a portion of the future Social Security benefits, and doing so without violating laws against alienation of Social Security benefits.

**III. CLAIMS**

**COUNT I  
PATENT INFRINGEMENT**

11. Defendant has infringed the '582 patent.
12. Defendant's infringement of the '582 patent has damaged and will continue to damage Plaintiffs.
13. Defendant's infringement of the '582 patent has caused and will continue to cause Plaintiffs irreparable harm unless enjoined by the Court.

**IV. DEMAND FOR JURY TRIAL**

14. Plaintiffs request a jury to hear this action.

**V. PRAYER FOR RELIEF**

For these reasons, Plaintiffs respectfully request that this Court enter judgment in their favor and grant the following relief:

- a) Adjudge that Defendant has infringed the '582 patent;
- b) Enter an order enjoining Defendant from any further acts of infringement of the '582 patent;
- c) Award Plaintiffs damages in an amount adequate to compensate them for Defendant's infringement of the '582 patent, but in no event less than a reasonable royalty under 35 U.S.C. § 284;
- d) Enter an order awarding Plaintiffs pre- and post-judgment interest on damages awarded and their costs under 35 U.S.C. § 284; and
- e) Award such other relief as the Court may deem appropriate and just.

Date: June 22, 2012

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

Brian E. Farnan (Bar No. 4089)  
Michael J. Farnan (Bar No. 5165)  
919 N. Market Street, 12<sup>th</sup> Floor  
Wilmington, Delaware 19801  
(302) 777-0300  
(302) 777-0301  
mfarnan@farnanlaw.com

**ATTORNEYS FOR PLAINTIFFS**