

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

BENEFIT FUNDING SYSTEMS LLC, AND  
RETIREMENT CAPITAL ACCESS  
MANAGEMENT COMPANY LLC

Plaintiffs,

v.

REGIONS FINANCIAL CORPORATION

Defendant.

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CIVIL ACTION NO. \_\_\_\_\_

JURY DEMANDED

COMPLAINT

Plaintiffs, Benefit Funding Systems LLC and Retirement Capital Access Management Company LLC (collectively, the “Plaintiffs”), complain of patent infringement by Regions Financial Corporation (“Regions”), and allege as follows:

**I. PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff Benefit Funding Systems LLC is a limited liability corporation organized and existing under the laws of the State of Delaware.
2. Plaintiff Retirement Capital Access Management Company LLC is a limited liability corporation organized and existing under the laws of the State of Delaware.
3. Defendant Regions Financial Corporation is a corporation organized and existing under the laws of the State of Delaware.
4. This is an action arising under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).
5. This Court has personal jurisdiction over Defendant by virtue of its incorporation in the State of Delaware and by availing itself of the laws and protections of this Judicial District.

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.

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 “Regions Ready Advance,” that involve, among other things, obtaining authorization to periodically withdraw a portion of future Social Security benefit payments, 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 benefit payments, 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 preliminarily and permanently 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

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