

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CYBERFONE SYSTEMS, LLC (formerly  
known as LVL PATENT GROUP, LLC),

Plaintiff,

v.

AMAZON.COM, INC.; AMAZON  
SERVICES LLC; EBAY INC.; PAYPAL,  
INC.; KAYAK SOFTWARE  
CORPORATION; EXPEDIA INC.;  
PRICELINE.COM INC.;  
TRAVELOCITY.COM, LP; ORBITZ  
WORLDWIDE, LLC; AMERICAN  
AIRLINES, INC.; DELTA AIRLINES, INC.;  
UNITED AIR LINES, INC.; SOUTHWEST  
AIRLINES CO.; AVIS BUDGET GROUP,  
INC.; ROUNDARCH, INC.; THE HERTZ  
CORPORATION; HOTELS.COM L.P.;  
MARRIOTT INTERNATIONAL, INC.;  
HILTON WORLDWIDE, INC.; HILTON  
HOTELS CORPORATION; HILTON  
GARDEN INNS MANAGEMENT LLC;  
STARWOOD HOTELS & RESORTS  
WORLDWIDE, INC.; PURE BIZ  
SOLUTIONS LLC; INTER-CONTINENTAL  
HOTELS CORPORATION; AND SIX  
CONTINENTS HOTELS, INC.,

Defendants.

C.A. No. 11-831-SLR

**DEMAND FOR JURY TRIAL**

**FIRST AMENDED COMPLAINT**

Plaintiff CyberFone Systems, LLC, (“CyberFone”), formerly known as LVL Patent Group, LLC, alleges as follows:

**PARTIES**

1. CyberFone is a Virginia limited liability company with its principal place of business at 231 Mill Road, Suite 100, Alexandria, Virginia 22314.

2. On information and belief, Defendant Amazon.com, Inc. (“Amazon”) is a Delaware corporation with its principal place of business at 410 Terry Avenue North, Seattle, Washington 98109. Amazon has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

3. On information and belief, Defendant Amazon Services LLC (“Amazon Services”) is a Nevada limited liability company with its principal place of business at 8329 West Sunset Road, Suite 200, Las Vegas, Nevada 89113. Amazon Services has appointed CSC Services of Nevada, Inc., 2215-B Renaissance Drive, Las Vegas, Nevada 89119, as its agent for service of process.

4. On information and belief, Defendant eBay Inc. (“eBay”) is a Delaware corporation with its principal place of business at 2065 Hamilton Avenue, San Jose, California 95125. eBay has appointed National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, Delaware 19904, as its agent for service of process.

5. On information and belief, Defendant PayPal, Inc. (“PayPal”) is a Delaware corporation with its principal place of business at 2211 North First Street, San Jose, California 95131. PayPal has appointed National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, Delaware 19904, as its agent for service of process.

6. On information and belief, Defendant Kayak Software Corporation (“Kayak”) is a Delaware corporation with its principal place of business at 55 North Water Street, Suite 1, Norwalk, Connecticut 06854. Kayak has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent service of process.

7. On information and belief, Expedia, Inc. (“Expedia”) is a Delaware corporation with its principal place of business at 3000 Hanover Street, Palo Alto, California 94303. Expedia has appointed National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, Delaware 19904, as its agent for service of process.

8. On information and belief, Priceline.com Inc. (“Priceline”) is a Delaware corporation with its principal place of business at 800 Connecticut Avenue, Norwalk, Connecticut 06854. Priceline has appointed Corporation Service Company, 2711 Centerville, Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

9. On information and belief, Defendant Travelocity.com LP (“Travelocity”) is a Delaware limited partnership with its principal place of business at 3150 Sabre Drive, Southlake,

Texas 76092. Travelocity has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

10. On information and belief, Orbitz Worldwide, LLC (“Orbitz”) is a Delaware limited liability company with its principal place of business at 500 W. Madison Street, Suite 1000, Chicago, Illinois 6066. Orbitz has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent service of process.

11. On information and belief, Defendant American Airlines, Inc. (“American”) is a Delaware corporation with its principal place of business located at 4333 Amon Carter Boulevard, Forth Worth, Texas 76155. American has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, as its agent for service of process.

12. On information and belief, Defendant Delta Air Lines, Inc. (“Delta”) is a Delaware corporation with its principal place of business at 1030 Delta Boulevard, Atlanta, Georgia 30320. Delta has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

13. On information and belief, Defendant United Air Lines, Inc. (“United”) is a Delaware corporation with is principal place of business at 77 West Wacker Drive, Suite 100, Chicago, Illinois 60601. United has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

14. On information and belief, Defendant Southwest Airlines Co. (“Southwest Airlines”) is a Texas corporation with its principal place of business at 2702 Love Field Drive, Dallas, Texas 75235. Southwest Airlines has appointed Corporation Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78201, as its agent for service of process.

15. On information and belief, Defendant Avis Budget Group, Inc. (“Avis”) is a Delaware corporation with its principal place of business at 6 Sylvan Way, Parsippany, New Jersey 07054. Avis has appointed Corporation Service Company, 2711 Centerville Road Suite, 400 Wilmington, Delaware, 19808, as its agent for service of process.

16. On information and belief, Defendant Roundarch, Inc. (“Roundarch”) is a Delaware corporation with its principal place of business at 2 World Finance Center, 225 Liberty Street, 36th Floor, New York, New York 10281. Roundarch has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, as its agent for service of process.

17. On information and belief, Defendant The Hertz Corporation (“Hertz”) is a Delaware corporation with its principal place of business at 225 Brae Boulevard, Park Ridge, New Jersey 07656. Hertz has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, as its agent service of process.

18. On information and belief, Defendant Hotels.com L.P. (“Hotels.com”) is a Delaware limited partnership with its principal place of business at 333 108th Avenue, Northeast, Bellevue, Washington 98004. Hotels.com has appointed National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, Delaware 19904, as its agent for service of process.

19. On information and belief, Defendant Marriott International, Inc. (“Marriott”) is a Delaware corporation with its principal place of business at 10400 Fernwood Road, Bethesda, Maryland, 20817. Marriott has appointed The Prentice-Hall Corporation System, Inc., 2711 Centerville Road, Suite 400, Wilmington, Delaware, 19808, as its agent for service of process.

20. On information and belief, Defendant Hilton Worldwide, Inc. (“Hilton Worldwide”) is a Delaware corporation with its principal place of business at 6950 Yarmouth Avenue, Reseda, California 91335. Hilton has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

21. On information and belief, Defendant Hilton Hotels Corporation (“Hilton Hotels”) is a Delaware corporation with its principal place of business at 9336 Civic Center Drive, Beverly Hills, California 90210. Hilton Corp. has appointed Worldwide Incorporators Ltd., 3411 Silverside Road, Rodney Building, Suite 104, Wilmington, Delaware 19810, as its agent for service of process.

22. On information and belief, Defendant Hilton Garden Inns Management LLC (“Hilton Garden”) is a Delaware limited liability company with its principal place of business at 9336 Civic Center Drive, Beverly Hills, California 90210. Hilton Garden has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process

23. On information and belief, Defendant Starwood Hotels & Resorts Worldwide, Inc. (“Starwood”) is a Maryland corporation with its principal place of business at 5530 Wisconsin Avenue, Chevy Chase, Maryland 20015. Starwood has appointed The Corporation Trust Incorporated, 351 West Camden Street, Baltimore, Maryland 21201, as its agent for service of process.

24. On information and belief, Defendant Pure Biz Solutions LLC (“Pure Biz”) is a California corporation with its principal place of business at 7033 West Sunset Boulevard, Suite 225, Los Angeles, California 90028. Pure Biz has appointed Alonso Vargas, 7033 W. Sunset Boulevard, Suite 225, Los Angeles, California 90028, as its agent for service of process.

25. On information and belief, Defendant Inter-Continental Hotels Corporation (“Inter-Continental”) is a Delaware corporation with its principal place of business at 3 Ravinia Drive, Suite 100, Atlanta, Georgia 30316. Inter-Continental has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware, 19801 as its agent for service of process.

26. On information and belief, Defendant Six Continents Hotels, Inc. (“Six Continents”) is a Delaware corporation with its principal place of business at 3 Ravinia Drive, Suite 100, Atlanta, Georgia 30346. Six Continents has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, as its agent for service of process.

JURISDICTION AND VENUE

27. This is an action for patent infringement arising under the patent laws of the United States of America, 35 U.S.C. § 1, *et seq.*, including § 271. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

28. Venue is proper in this district under 28 U.S.C. §§ 1391 (b)-(d) and 1400(b) because each defendant is subject to personal jurisdiction in this district, has committed acts of patent infringement in this district, or has a regular and established place of business in this district.

COUNT I

(Infringement of U.S. Patent No. 8,019,060)

29. CyberFone is the owner by assignment of United States Patent No. 8,019,060 (“the ‘060 patent”), entitled “Telephone/Transaction Entry Device and System for Entering Transaction Data into Databases.” The ‘060 patent issued on September 13, 2011. A true and correct copy of the ‘060 patent is attached hereto as Exhibit A.

30. Amazon has infringed and still is infringing at least claim 1 of the ‘060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Amazon Mobile application for iOS, Price Check by Amazon application for iOS, Amazon Deals application for iOS, MYHABIT application for iOS, Amazon Student application for iOS, Amazon Mobile application for Android, Amazon Kindle application for Android, AmazonFresh application for Android, Amazon.com application for Windows Phone 7, and Amazon Fresh application for Windows Phone 7.

31. Amazon Services has infringed and still is infringing at least claim 1 of the ‘060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell,

or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Amazon Kindle application for Windows Phone 7.

32. eBay has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Official eBay Android App application for Android, eBay Annunci application for Android, eBay Classifieds application for Android, Auction application for Android, eBay application for iOS, eBay Motors application for iOS, eBay Instant Sale application for iOS, eBay Fashion application for iOS, eBay Classifieds application for iOS, eBay Classifieds Pets application for iOS, eBay Annunci application for iOS, eBay application for Windows Phone, and eBay application for BlackBerry.

33. PayPal has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its PayPal application for iOS.

34. Kayak has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a

single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its KAYAK Travel search Flights Hotels Cars Flight Status Trips application for BlackBerry, KAYAK Flight and Hotel Search application for Android, Kayak Lite application for Android, KAYAK Flights Hotels Rental Cars Flight Tracker Status Ultimate Travel Planner application for iOS, KAYAK PRO Flights Hotels Rental Cars Flight Tracker Status Ultimate Travel Planner application for iOS, Flight Status application for iOS, Flight Status PRO application for iOS, and KAYAK Flight & Hotel Search application for Windows Phone 7.

35. Expedia has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Expedia Hotels—Book a Room application for Android, TripAssist by Expedia application for iOS, and Expedia Hotels—Book Your Hotel Rooms application for iOS.

36. Priceline has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transaction, using its mobile services network platform, including, but not limited to, its priceline Hotel Negotiator application for Android and priceline Hotel & Car Negotiator application for iOS.

37. Travelocity has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or



importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Travelocity application for iOS, Travelocity application for Android, and Travelocity application for Windows Phone 7.

38. Orbitz has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Orbitz Flights, Hotels, Cars application for iOS and Orbitz—Hotels, Flights, Cars application for Android.

39. American has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited, to its American Airlines application for Windows Phone 7, American Airlines application for iOS, and American Airlines application for Android.

40. Delta has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information

entered in the single transmission, using its mobile services network platform, including, but not limited to, its Fly Delta application for Blackberry, Fly Delta application for iOS, Fly Delta application for Android, and Fly Delta application for Windows Phone 7.

41. United has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its United Airlines application for iOS and United Airlines application for Android.

42. Southwest has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Southwest Airlines application for iOS, SWALife Mobile application for iOS, Southwest Airlines application for Android, SWALife Mobile application for Android, SWALife Mobile application for Blackberry, and Southwest Airlines application for Blackberry.

43. Avis has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Avis Reservation App application for iOS, Avis Mobile App application for Windows Phone 7, and Avis application for Blackberry.

44. Roundarch has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Avis Reservation App application for iOS.

45. Hertz has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Hertz RentACar application for BlackBerry, Hertz Car Rental application for iOS, Connect by Hertz application for iOS, and Hertz RentACar application for Android.

46. Hotels.com has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Hotels.com—Hotel Reservations for 135,000 Hotels application for iOS and Hotels.com—Book hotels application for Android.

47. Marriott has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission,

and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Marriott International application for BlackBerry, Marriott International application for iOS, and Marriott International application for Android.

48. Hilton Worldwide has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Hilton application for iOS, Hilton Garden Inn application for iOS, Bizwords by Hilton Garden Inn application for iOS, Conrad Hotels & Resorts application for iOS, Hampton application for iOS, Embassy application for iOS, Homewood Suites application for iOS, DoubleTree application for iOS, and Waldorf Astoria Hotels & Resorts application for iOS.

49. Hilton Hotels has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Hilton application for iOS, Hilton Garden Inn application for iOS, Hampton application for iOS, Embassy application for iOS, Conrad Hotels & Resorts application for iOS, Homewood Suites application for iOS, DoubleTree application for iOS, and Waldorf Astoria Hotels & Resorts application for iOS.

50. Hilton Garden has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a

single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Bizwords by Hilton Garden Inn application for iOS.

51. Starwood has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its W Hotels Worldwide application for iOS, St. Regis New York E-Butler application for iOS, SPG Mobile App application for iOS, and SPG Mobile Application application for BlackBerry.

52. Pure Biz has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its St. Regis New York E-Butler application for iOS.

53. Inter-Continental has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Priority Club Rewards application for Android, Priority Club Rewards application

for iOS, Holiday Inn Express Hotels application for iOS, Holiday Inn Hotels & Resorts application for iOS, Crowne Plaza Hotels & Resorts application for iOS, Candlewood Suites application for iOS, Staybridge Suites application for iOS, Hotel Indigo application for iOS, Inter-Continental Hotels & Resorts application for iOS, Candlewood Suites application for Blackberry, Crowne Plaza application for Blackberry, Holiday Inn application for Blackberry, Holiday Inn Express Hotels application for Blackberry, Hotel Indigo application for Blackberry, IHG application for Blackberry, Priority Club Rewards application for Blackberry, Staybridge Suites application for Blackberry, and Intercontinental Hotels and Resorts application for Blackberry.

54. Six Continents has infringed and still is infringing at least claim 1 of the '060 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing software for obtaining data transaction information entered on a telephone from a single transmission, forming a plurality of exploded data transactions for the single transmission, and sending different exploded data transactions to different destinations based on information entered in the single transmission, using its mobile services network platform, including, but not limited to, its Priority Club Rewards application for iOS, Holiday Inn Express Hotels application for iOS, Holiday Inn Hotels & Resorts application for iOS, Crowne Plaza Hotels & Resorts application for iOS, Candlewood Suites application for iOS, Staybridge Suites application for iOS, Hotel Indigo application for iOS, and Inter-Continental Hotels & Resorts application for iOS.

55. As a result of each Defendant's infringement of the '060 patent, CyberFone has suffered monetary damages in an amount not yet determined, and will continue to suffer damages in the future unless each Defendant's infringing activities are enjoined by this Court.

56. Unless a permanent injunction is issued enjoining each Defendant and its agents, servants, employees, attorneys, representatives, affiliates, and all others acting on its behalf from infringing the '060 patent, CyberFone will suffer irreparable harm.

PRAYER FOR RELIEF

CyberFone prays for the following relief:

1. A judgment that each defendant has infringed (either literally or under the doctrine of equivalents) one or more claims of the '060 patent;
2. A permanent injunction enjoining defendants and their officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with them, from infringing the '060 patent;
3. An award of damages resulting from each defendant's acts of infringement in accordance with 35 U.S.C. § 284;
4. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to CyberFone its reasonable attorneys' fees against each defendant;
5. A judgment and order requiring defendants to provide an accounting and to pay supplemental damages to CyberFone, including without limitation, pre-judgment and post-judgment interest; and
6. Any and all other relief to which CyberFone may show itself to be entitled.

DEMAND FOR JURY TRIAL

CyberFone demands a trial by jury on all issues so triable.

November 18, 2011

BAYARD, P.A.

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