IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

MEADOWS FINANCIAL SYSTEMS, LLC,	§	
	§	
Plaintiff,	§	
	§	**CIVIL ACTION NO.**
v.	§	
	§	
CICI ENTERPRISES, LP,	§	**JURY TRIAL DEMANDED**
Defendant.	§	
	§	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Meadows Financial Systems, LLC ("Plaintiff" or "Meadows"), hereby alleges for its Complaint against Defendant Cici Enterprises, LP ("Defendant" or "Cici Enterprises") on personal knowledge as to its own actions and on information and belief as to the actions of others, as follows:

PARTIES

1. Plaintiff Meadows is a Texas corporation with a principal place of business at 104 East Houston Street, Suite 170A, Marshall, Texas 75670.

2. Upon information and belief, Defendant Cici Enterprises is a Delaware limited partnership, with its principal place of business located at 1080 West Bethel Road, Coppell, Texas 75019. Cici Enterprises is authorized by the Secretary of State of the State of Texas to do business in this state and can be served with process of service by

and through its registered agent of record, CSC-Lawyers Incorporating Service Company 211 East 7th Street, Suite 620, Austin, Texas 78701-3218.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, 35 U.S.C. § *et seq.*, including 35 U.S.C. § 271. This Court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

4. Venue is proper in the Eastern District of Texas pursuant to 28 U.S.C. §§1391 and 1400(b). On information and belief, Defendant has transacted business in this district, and has committed and/or induced acts of patent infringement in this district.

5. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to their substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this Judicial District.

COUNT I– INFRINGEMENT OF U.S. PATENT 8,064,434

6. On November 22, 2011, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,064,434 ("the '434 Patent"), entitled "Method for Providing Internet Services to a Telephone User." A true and correct copy of the '434 Patent is attached to the Complaint as Exhibit A.

7. Upon information and belief, Defendant has been and is now directly infringing, both literally and/or under the doctrine of equivalents, the claims of the '434 Patent in the State of Texas, in this judicial district, and elsewhere in the United States, by, among other things, providing a method for providing the capability to use internet-based applications to a telephone user ("Accused Defendant Product"). By making, using, and/or providing the Accused Defendant Product, for example the Cici Enterprises mobile internet site, that is covered by one or more claims of the '434 Patent, Defendant has injured Meadows and is thus liable to Meadows for infringement of the '434 Patent pursuant to 35 U.S.C. § 271.

8. As a result of Cici Enterprises' unlawful infringement of the '434 Patent, Meadows has suffered and will continue to suffer damage. Meadows is entitled to recover from Defendant the damages adequate to compensate for such infringement, which have yet to be determined.

9. Defendant's acts of infringement have caused and will continue to cause irreparable harm to Meadows unless and until enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, Meadows prays for a Judgment from this Honorable Court in favor of Meadows and against the Defendant as follows:

1. That the '434 Patent is valid and enforceable;
2. That Defendant has directly infringed the '434 Patent;

3. An order requiring Defendant to pay Meadows its damages, costs, expenses, and pre-judgment and post-judgment interest for its infringement of the '434 Patent as provided under 35 U.S.C. § 284;

4. An order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Meadows its reasonable attorneys' fees; and

5. Any and all other relief to which Meadows may show itself to be entitled.

JURY DEMAND

Meadows, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: October 29, 2012 Respectfully submitted,

By: ___/s/ *Andrew W. Spangler*_____

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