

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

**CREDIT CARD FRAUD CONTROL
CORPORATION,**

Plaintiff,

v.

CYBERSOURCE CORPORATION,

Defendant.

Civil Action No. _____

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT

Plaintiff Credit Card Fraud Control Corporation files this Complaint against CyberSource Corporation for infringement of U.S. Patent No. 8,229,844 (“the ’844 patent”).

THE PARTIES

1. Credit Card Fraud Control Corporation (“Fraud Control”) is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Newport Beach, CA.
2. CyberSource Corporation (“Defendant”) is a Delaware corporation with its principal place of business in Foster City, California. This Defendant may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Rd., Suite 400, Wilmington, Delaware, 19808.

JURISDICTION AND VENUE

3. Fraud Control brings this action for patent infringement under the patent laws of the United States, namely 35 U.S.C. §§ 271, 281, and 284-285, among others.

4. This Court has subject matter jurisdiction over the claims in this action pursuant to 28 U.S.C. §§ 1331, 1338(a), and 1367.

5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c) and 1400(b). On information and belief, Defendant is deemed to reside in this judicial district, has committed acts of infringement based on transactions arising in this judicial district, has purposely transacted business in this judicial district, and/or has regular and established places of business in this judicial district.

6. Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Florida Long Arm Statute, due at least to its substantial business in this State and judicial district, including: (A) committing acts of infringement based on transactions arising in Florida; and (B) operating, conducting, engaging in, or carrying on business in Florida.

PATENT INFRINGEMENT

7. Fraud Control incorporates paragraphs 1 through 6 herein by reference.

8. Fraud Control is the exclusive licensee of the '844 patent, entitled "Method of Billing a Purchase Made Over a Computer Network," with ownership of all substantial rights in the '844 patent, including the right exclude others and to enforce, sue and recover damages for past and future infringement. A true and correct copy of the '844 patent is attached as Exhibit A.

9. The '844 patent is valid, enforceable and was duly issued in full compliance with Title 35 of the United States Code.

10. Defendant has directly infringed and continues to directly infringe one or more claims of the '844 patent, including (for example) at least claim 42, without the consent or

authorization of Fraud Control, by using Internet address information (*e.g.*, an IP address) to identify, manage, and/or prevent fraudulent Internet transactions.

11. More particularly, Defendant has committed direct infringements as alleged in paragraph 10 at least, and by way of example, through operation of the IP Address Blocking feature provided in connection with the Authorize.Net Advanced Fraud Detection Suite.

12. Fraud Control has been damaged as a result of Defendant's infringing conduct described in paragraphs 10-11. Defendant is, thus, liable to Fraud Control in an amount that adequately compensates it for Defendant's infringements, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

Fraud Control hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

Fraud Control requests that the Court find in its favor and against Defendant, and that the Court grant Fraud Control the following relief:

- a. Judgment that one or more claims of the '844 patent has been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that Defendant account for and pay to Fraud Control all damages to and costs incurred by Fraud Control because of Defendant's infringing activities and other conduct complained of herein;
- c. Judgment that Defendant account for and pay to Fraud Control a reasonable, on-going, post-judgment royalty because of Defendant's infringing activities and other conduct complained of herein;
- d. That Fraud control be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and

- e. That Fraud Control be granted such other and further relief as the Court may deem just and proper under the circumstances.

Dated: October 17, 2012

Respectfully submitted,

/s/ Joshua B. Spector
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*Motion for Admission, Pro Hac Vice
forthcoming*

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