IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DATAQUILL LIMITED	§	
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	§	
Plaintiff,	§	
	§	
	§	
v.	§	**Civil Action No. 1:13-cv-706**
	§	
APPLE INC.	§	
	§	
Defendant.	§	
	§	**JURY TRIAL REQUESTED**
	§	
	§	
	§	
	§	

PLAINTIFF'S ORIGINAL COMPLAINT

Plaintiff DataQuill Limited files this Original Complaint for patent infringement against Defendant Apple Inc.

PARTIES

1. Plaintiff DataQuill Limited ("DataQuill") is a limited company organized under the laws of the British Virgin Islands.

2. On information and belief, Defendant Apple Inc. ("Apple") is a corporation duly organized and existing under the laws of the state of California, with places of business at 12545 Riata Vista Circle, Austin, TX 78727, and 1 Infinite Loop, Cupertino, CA 95014. Apple may be served with process in Texas through its registered agent, C T Corporation System, at 350 North St. Paul St., Suite 2900, Dallas, TX 75201.

JURISDICTION AND VENUE

3. This is an action for patent infringement under the Patent Laws of the United States, 35 U.S.C. § 271.

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Apple. Apple regularly sells (either directly or indirectly) products and services into this judicial district. Additionally, Apple has substantial operations located in this judicial district including an existing campus that employs more than 3,500 individuals. Apple is also currently building a new campus that it has publicly stated will more than double the size of its workforce in this judicial district.

6. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and 1400(b) because a substantial part of the events giving rise to the claims occurred in this district, Apple has a regular and established practice of business in this district, and Apple has committed acts of infringement in this district.

DATAQUILL & THE ASSERTED PATENTS

7. Over the past twelve years, DataQuill has sought to protect its invention through a licensing program (which has on several occasions required litigation). Many of the largest high-tech companies, including HTC, Nokia, Motorola, LG, Samsung, Palm, and Hewlett-Packard, have purchased a license to DataQuill's patent portfolio. To date, DataQuill has obtained over $75 million in licensing revenue.

8. The value of DataQuill's asserted patents is further demonstrated by DataQuill's repeated success against validity challenges. Three of the asserted patents have been through reexaminations at the United States Patent & Trademark Office where hundreds of references

have been considered. In prior litigations, several of the asserted patents withstood heavy scrutiny, including motions for summary judgment of anticipation, obviousness, inequitable conduct, lack of enablement, and lack of an adequate written description—all of which were resolved in DataQuill's favor. The following is a list of DataQuill's previous litigation, all of which concluded with the defendant taking a license to DataQuill's portfolio:

- *DataQuill Ltd. v. Handspring Inc.*, No. 1:01-cv-04635 (N.D. Ill.) (June 19, 2001 – October 4, 2005)
- *DataQuill Limited v. Kyocera Wireless*, No. 3:01-cv-02302 (S.D. Cal.) (December 14, 2001 – April 25, 2006)
- *DataQuill Limited v. Novatel Wireless Inc.*, No. 3:03-cv-02066 (S.D. Cal. (October 16, 2003 – July 1, 2004)
- *Research In Motion Limited v. DataQuill BVI, Ltd.*, No. 3:06-cv-00973 (N.D. Tex.) (March 31, 2006 – December 3, 2008)
- *DataQuill Limited v. Nokia Corp.*, No. 3:07-cv-01055 (S.D. Cal.) (June 8, 2007 – April 9, 2008)
- *DataQuill Limited v. High Tech Computer Corp.*, No. 3:08-cv-00543 (S.D. Cal.) (March 25, 2008 – September 21, 2012)

9. Prior to filing this lawsuit, DataQuill diligently attempted to resolve its claims against Apple without litigation. Beginning in April 2009, DataQuill had communications with Apple. Over the course of these discussions, DataQuill has repeatedly informed Apple that it is infringing DataQuill's patents and provided claim charts that specifically describe the infringement. The following partial chronology details DataQuill's attempts to resolve its dispute with Apple:

- On April 14, 2009, DataQuill sent Apple a claim chart detailing how the iPhone infringes DataQuill's U.S. Patent No. 6,058,304 and a copy of the district court's claim construction order issued in connection with DataQuill's litigation against Research in Motion.
- On May 13, 2009, DataQuill sent Apple a claim chart detailing how the iPhone infringes DataQuill's U.S. Patent No. 7,505,785 as well as a copy of another pending and published DataQuill patent application.
- On November 30, 2009, DataQuill sent Apple a letter including a copy of the Reexamination Certificate for U.S. Patent No. 7,139,591 along with a claim chart detailing how the iPhone infringes that patent. In this letter, DataQuill requested that Apple consider purchasing a license to DataQuill's patents.
- On April 21, 2010, DataQuill sent Apple a copy of the Reexamination Certificate issued for DataQuill's U.S. Patent No. 6,058,304. In this letter, DataQuill again requested that Apple consider purchasing a license to DataQuill's patents.
- On April 13, 2011, DataQuill sent Apple another letter requesting that Apple consider taking a license to DataQuill's portfolio. This letter also included a copy of DataQuill's then-recently issued U.S. Patent. No. 7,920,898.
- On May 16, 2011, DataQuill sent Apple another letter in which it provided a copy of the Reexamination Certificate for DataQuill's U.S. Patent No. 7,505,785 and yet again requested that Apple consider purchasing a license.

10. Notwithstanding DataQuill's concerted efforts to resolve its claims against Apple without litigation—and despite DataQuill's extensive and successful history of licensing its

portfolio to major players in the smartphone industry—Apple has declined to enter into a license agreement with DataQuill.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,058,304

11. DataQuill incorporates the foregoing paragraphs as if fully set forth here.

12. On May 2, 2000, the United States Patent & Trademark Office ("USPTO") duly and legally issued United States Patent No. 6,058,304 ("the '304 Patent"), entitled "Data Entry System" to DataQuill Limited. On April 13, 2010, the USPTO issued an Ex Parte Reexamination Certificate for the '304 Patent. DataQuill owns the '304 Patent and holds the right to sue and recover damages for infringement thereof.

13. Apple has been and now is directly infringing the '304 Patent in the state of Texas, in this judicial district, and elsewhere within the United States by making, using, offering for sale, selling, and/or importing devices that infringe one or more claims of the '304 Patent, including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5. Apple is thus liable for infringement of the '304 Patent under 35 U.S.C. § 271(a).

14. Apple has had knowledge of the '304 Patent and Apple's infringement thereof since no later than April 14, 2009. On that date, DataQuill provided Apple with a claim chart for the Apple iPhone describing how it infringes the '304 Patent. DataQuill also provided Apple with a copy of the claim construction order issued in the Research in Motion case. Thereafter, and on an on-going basis, DataQuill provided Apple with infringement charts and updates about the issuance of new patents and reexamination certificates. For example, on April 21, 2010, DataQuill sent Apple a letter informing it of the issuance of the '304 Patent's Ex Parte Reexamination Certificate.

15. With knowledge of the ‘304 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged its retailers to directly infringe the ‘304 Patent by offering to sell and selling these devices to end user consumers. Apple knew of and intended to cause its retailers’ direct infringement and is therefore liable for inducing their infringement of the ‘304 Patent under 35 U.S.C. § 271(b).

16. With knowledge of the ‘304 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged end users to directly infringe the ‘304 Patent by using these devices. Apple has marketed, promoted, and instructed users to use these devices in an infringing manner. This marketing, promotion, and instruction has specifically included instructions to use the App Store, iTunes, and iBooks functionality to download apps, music, podcasts, audiobooks, and books. Apple knew of and intended to cause its end users’ direct infringement and is therefore liable for inducing their infringement of the ‘304 Patent under 35 U.S.C. § 271(b).

17. As a result of its infringement of the ‘304 Patent, Apple has damaged DataQuill. Apple is liable to DataQuill in an amount to be determined at trial that adequately compensates DataQuill for the infringement, which by law can be no less than a reasonable royalty.

18. Because Apple knew of the ‘304 Patent and its infringement thereof (as detailed above), Apple’s infringement of the ‘304 Patent is therefore willful and deliberate, entitling DataQuill to increased damages under 35 U.S.C. § 284 and to attorneys’ fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

COUNT II: INFRINGEMENT OF U.S. PATENT NO. 7,139,591

19. DataQuill incorporates the foregoing paragraphs as if fully set forth here.

20. On November 21, 2006 the USPTO duly and legally issued United States Patent No. 7,139,591 ("the '591 Patent"), entitled "Hand Held Telecommunications And Data Entry Device" to DataQuill Limited. On October 29, 2009, the USPTO issued an Ex Parte Reexamination Certificate for the '591 Patent. The '591 Patent claims priority to and is entitled to the filing date of the '304 Patent. DataQuill owns the '591 Patent and holds the right to sue and recover damages for infringement thereof.

21. Apple has been and now is directly infringing the '591 Patent in the state of Texas, in this judicial district, and elsewhere within the United States by making, using, offering for sale, selling, and/or importing devices that infringe one or more claims of the '591 Patent, including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5. Apple is thus liable for infringement of the '591 Patent under 35 U.S.C. § 271(a).

22. Apple has had knowledge of the '591 Patent and Apple's infringement thereof since no later than April 14, 2009. On that date, DataQuill provided Apple with a claim chart for the Apple iPhone describing how it infringes the related '304 Patent. DataQuill also provided Apple with a copy of the claim construction order issued in the RIM case. This order also addresses the '591 Patent. Thereafter, and on an on-going basis, DataQuill provided Apple with infringement charts and updates about the issuance of new patents and reexamination certificates. For example, on May 26, 2009, DataQuill sent Apple a letter concerning its infringement that specifically identified the '591 Patent in the subject line. Additionally, DataQuill informed Apple of the issuance of the Ex Parte Reexamination Certificate for the '591

Patent and provided Apple with a claim chart detailing its infringement of the ’591 Patent no later than November 30, 2009.

23. With knowledge of the ‘591 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged its retailers to directly infringe the ‘591 Patent by offering to sell and selling these devices to end user consumers. Apple knew of and intended to cause its retailers’ direct infringement and is therefore liable for inducing their infringement of the ‘591 Patent under 35 U.S.C. § 271(b).

24. With knowledge of the ‘591 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged end users to directly infringe the ‘591 Patent by using these devices. Apple has marketed, promoted, and instructed users to use these devices in an infringing manner. This marketing, promotion, and instruction has specifically included instructions to use the App Store, iTunes, and iBooks functionality to download apps, music, podcasts, audiobooks, and books. Apple knew of and intended to cause its end users’ direct infringement and is therefore liable for inducing their infringement of the ‘591 Patent under 35 U.S.C. § 271(b).

25. As a result of its infringement of the ‘591 Patent, Apple has damaged DataQuill. Apple is liable to DataQuill in an amount to be determined at trial that adequately compensates DataQuill for the infringement, which by law can be no less than a reasonable royalty.

26. Because Apple knew of the ‘591 Patent and its infringement thereof (as detailed above), Apple’s infringement of the ‘591 Patent is therefore willful and deliberate, entitling

DataQuill to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

COUNT III: INFRINGEMENT OF U.S. PATENT NO. 7,505,785

27. DataQuill incorporates the foregoing paragraphs as if fully set forth here.

28. On March 17, 2009, the USPTO duly and legally issued United States Patent No. 7,505,785 ("the '785 Patent"), entitled "Data Entry Systems" to DataQuill Limited. On May 10, 2011, the USPTO issued an Ex Parte Reexamination Certificate for the '785 Patent. The '785 Patent claims priority to and is entitled to the filing date of the '304 Patent. DataQuill owns the '785 Patent and holds the right to sue and recover damages for infringement thereof.

29. Apple has been and now is directly infringing the '785 Patent in the state of Texas, in this judicial district, and elsewhere within the United States by making, using, offering for sale, selling, and/or importing devices that infringe one or more claims of the '785 Patent, including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5. Apple is thus liable for infringement of the '785 Patent under 35 U.S.C. § 271(a).

30. Apple has had knowledge of the '785 Patent and Apple's infringement thereof since no later than May 13, 2009. On that date, DataQuill provided Apple with a claim chart for the Apple iPhone describing how it infringes the '785 Patent. Thereafter, and on an on-going basis, DataQuill provided Apple with infringement charts and updates about the issuance of new patents and reexamination certificates. For example, on May 16, 2011, DataQuill sent Apple a letter informing it of the issuance of the '785 Patent's Ex Parte Reexamination Certificate.

31. With knowledge of the '785 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged its retailers to directly infringe the

‘785 Patent by offering to sell and selling these devices to end user consumers. Apple knew of and intended to cause its retailers’ direct infringement and is therefore liable for inducing their infringement of the ‘785 Patent under 35 U.S.C. § 271(b).

32. With knowledge of the ‘785 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged end users to directly infringe the ‘785 Patent by using these devices. Apple has marketed, promoted, and instructed users to use these devices in an infringing manner. This marketing, promotion, and instruction has specifically included instructions to use the App Store, iTunes, and iBooks functionality to download apps, music, podcasts, audiobooks, and books. Apple knew of and intended to cause its end users’ direct infringement and is therefore liable for inducing their infringement of the ‘785 Patent under 35 U.S.C. § 271(b).

33. As a result of its infringement of the ‘785 Patent, Apple has damaged DataQuill. Apple is liable to DataQuill in an amount to be determined at trial that adequately compensates DataQuill for the infringement, which by law can be no less than a reasonable royalty.

34. Because Apple knew of the ‘785 Patent and its infringement thereof (as detailed above), Apple’s infringement of the ‘785 Patent is therefore willful and deliberate, entitling DataQuill to increased damages under 35 U.S.C. § 284 and to attorneys’ fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 7,920,898

35. DataQuill incorporates the foregoing paragraphs as if fully set forth here.

36. On April 5, 2011, the USPTO duly and legally issued United States Patent No. 7,920,898 (“the ‘898 Patent”), entitled “Data Entry Systems” to DataQuill Limited. The ‘898

Patent claims priority to and is entitled to the filing date of the ‘304 Patent. DataQuill owns the ‘898 Patent and holds the right to sue and recover damages for infringement thereof.

37. Apple has been and now is directly infringing the ‘898 Patent in the state of Texas, in this judicial district, and elsewhere within the United States by making, using, offering for sale, selling, and/or importing devices that infringe one or more claims of the ‘898 Patent, including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5. Apple is thus liable for infringement of the ‘898 Patent pursuant to 35 U.S.C. § 271(a).

38. On May 14, 2009, DataQuill provided Apple with a copy of the published patent application that issued as the ‘898 Patent. On November 30, 2009, DataQuill provided Apple with a re-published copy of the application that issued as the ‘898 Patent. DataQuill is thus also entitled to a reasonable royalty for Apple’s making, using, offering for sale, selling, and importing into the United States the invention claimed in the published patent applications and substantially identical inventions claimed in the ‘898 Patent under 35 U.S.C. § 154(d).

39. Apple has had knowledge of the ‘898 Patent and Apple’s infringement thereof since no later than May 14, 2009. On that date, DataQuill provided Apple with a copy of the published patent application that resulted in the ‘898 Patent. Thereafter, and on an on-going basis, DataQuill provided Apple with infringement charts and updates about the issuance of new patents and reexamination certificates. For example, DataQuill sent Apple a letter informing it of the issuance of the ‘898 Patent on April 13, 2011.

40. With knowledge of the ‘898 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged its retailers to directly infringe the ‘898 Patent by offering to sell and selling these devices to end user consumers. Apple knew of

and intended to cause its retailers' direct infringement and is therefore liable for inducing their infringement of the '898 Patent under 35 U.S.C. § 271(b).

41. With knowledge of the '898 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged end users to directly infringe the '898 Patent by using these devices. Apple has marketed, promoted, and instructed users to use these devices in an infringing manner. This marketing, promotion, and instruction has specifically included instructions to use the App Store, iTunes, and iBooks functionality to download apps, music, podcasts, audiobooks, and books. Apple knew of and intended to cause its end users' direct infringement and is therefore liable for inducing their infringement of the '898 Patent under 35 U.S.C. § 271(b).

42. As a result of its infringement of the '898 Patent, Apple has damaged DataQuill. Apple is liable to DataQuill in an amount to be determined at trial that adequately compensates DataQuill for the infringement, which by law can be no less than a reasonable royalty.

43. Because Apple knew of the '898 Patent and its infringement thereof (as detailed above), Apple's infringement of the '898 Patent is therefore willful and deliberate, entitling DataQuill to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

COUNT V: INFRINGEMENT OF U.S. PATENT NO. 8,290,538

44. DataQuill incorporates the foregoing paragraphs as if fully set forth here.

45. On October 16, 2012, the USPTO duly and legally issued United States Patent No. 8,290,538 ("the '538 Patent"), entitled "Data Entry Systems" to DataQuill Limited. The

‘538 Patent claims priority to and is entitled to the filing date of the ‘304 Patent. DataQuill owns the ‘538 Patent and holds the right to sue and recover damages for infringement thereof.

46. Apple has been and now is directly infringing the ‘538 Patent in the state of Texas, in this judicial district, and elsewhere within the United States by making, using, offering for sale, selling, and/or importing devices that infringe one or more claims of the ‘538 Patent, including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5. Apple is thus liable for infringement of the ‘538 Patent pursuant to 35 U.S.C. § 271(a).

47. On information and belief, Apple has had knowledge of the ‘538 Patent and Apple’s infringement thereof since no later than its issuance on October 16, 2012. As described in the preceding paragraphs, DataQuill and Apple have an extensive history of correspondence that demonstrates that Apple was familiar with DataQuill’s patent portfolio. At a minimum, Apple has had knowledge of the ‘538 Patent and its infringement thereof since no later than the filing of this lawsuit.

48. With knowledge of the ‘538 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged its retailers to directly infringe the ‘538 Patent by offering to sell and selling these devices to end user consumers. Apple knew of and intended to cause its retailers’ direct infringement and is therefore liable for inducing their infringement of the ‘538 Patent under 35 U.S.C. § 271(b).

49. With knowledge of the ‘538 Patent and knowledge of the infringing nature of its devices including the iPhone, iPhone 3G, iPhone 3GS, iPhone 4, iPhone 4S, and iPhone 5 (or, at a minimum, willful blindness thereto), Apple has encouraged end users to directly infringe the ‘538 Patent by using these devices. Apple has marketed, promoted, and instructed users to use

these devices in an infringing manner. This marketing, promotion, and instruction has specifically included instructions to use the App Store, iTunes, and iBooks functionality to download apps, music, podcasts, audiobooks, and books. Apple knew of and intended to cause its end users' direct infringement and is therefore liable for inducing their infringement of the '538 Patent under 35 U.S.C. § 271(b).

50. As a result of its infringement of the '538 Patent, Apple has damaged DataQuill. Apple is liable to DataQuill in an amount to be determined at trial that adequately compensates DataQuill for the infringement, which by law can be no less than a reasonable royalty.

51. On information and belief, Apple knew of the '538 Patent and its infringement thereof (as detailed above), and Apple's infringement of the '538 Patent is therefore willful and deliberate, entitling DataQuill to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff DataQuill prays for the following relief:

52. A judgment in favor of DataQuill that Apple has infringed the '304, '591, '785, '898, and '538 Patents;

53. A judgment in favor of DataQuill that Apple's infringement of the '304, '591, '785, '898, and '538 Patents was willful and that DataQuill is therefore is entitled to treble damages and attorney fees under 35 U.S.C. § 284 and 35 U.S.C. § 285;

54. A judgment and order requiring Apple to pay DataQuill damage for its infringement of the '304, '591, '785, '898, and '538 Patents, together with interest (both pre- and post-judgment), costs and disbursements as fixed by this Court under 35 U.S.C. § 284 and 35 U.S.C. § 285;

55. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to DataQuill its reasonable attorney's fees; and

56. Such other and further relief in law or in equity to which DataQuill may be justly entitled.

DEMAND FOR JURY TRIAL

57. Plaintiff demands a trial by jury of any and all issues triable of right before a jury.

Dated: August 16, 2013

Respectfully submitted,

Parker C. Folse, III (by permission Douglas R. Wilson)

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