

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

LEADER TECHNOLOGIES, INC., a Delaware corporation,)	
)	
Plaintiff,)	Civil Action No.
)	
v.)	
)	
FACEBOOK, INC., a Delaware corporation,)	DEMAND FOR JURY
)	TRIAL
Defendant.)	

Plaintiff Leader Technologies, Inc. (“Plaintiff” or “Leader”) alleges as follows:

THE PARTIES

1. Plaintiff Leader is a corporation organized and existing under the laws of the State of Delaware, with its corporate headquarters located at 921 Eastwind Drive, Suite 118, Westerville, Ohio 43081.
2. Defendant Facebook, Inc. (“Defendant” or “Facebook”) is a corporation organized and existing under the laws of the State of Delaware, with its corporate headquarters at 165 University Avenue, Palo Alto, California 94301.

JURISDICTION AND VENUE

3. This action arises under the Patent Act, 35 U.S.C. §271 *et seq.* This Court has original jurisdiction over this controversy pursuant to 28 U.S.C. §§ 1331 and 1338.
4. Venue in this judicial district is proper under 28 U.S.C. § 1391(b) and 28 U.S.C. § 1400(b). On information and belief, this Court has personal jurisdiction over Facebook because it is incorporated in this district, does business in this district and has, and continues to, infringe, contributorily infringe and/or induce the infringement of U.S. Patent No. 7,139,761 in this district.

PLAINTIFF'S PATENT

5. On November 21, 2006, United States Patent No. 7,139,761 ("the '761 Patent"), entitled DYNAMIC ASSOCIATION OF ELECTRONICALLY STORED INFORMATION WITH ITERATIVE WORKFLOW CHANGES, was issued to Michael T. McKibben and Jeffrey R. Lamb. Leader was assigned all ownership rights to the '761 Patent. A true and correct copy of the '761 Patent is attached to this complaint as Exhibit A and incorporated herein by reference.

6. Generally, the '761 Patent is directed to a method and system for the management and storage of electronic information.

PATENT INFRINGEMENT

7. Leader is informed and believes Facebook operates a web site which can be found on the World Wide Web at <http://www.facebook.com> (the "Facebook website"). Leader is informed and believes Facebook has and continues to infringe the '761 Patent by making, using, importing, selling, offering for sale, distributing, advertising, and marketing products and services, including but not limited to those related to the Facebook website, that infringe the '761 Patent.

FIRST CAUSE OF ACTION

(Infringement of the '761 Patent)

8. Leader realleges each and every allegation set forth in Paragraphs 1 through 7, inclusive, and incorporates them herein by reference.

9. Leader is informed and believes that Facebook has and continues to infringe, contributorily infringe, and/or induce the infringement of the '761 Patent by making, using, importing, selling, offering for sale, distributing, advertising, and marketing products and

services, including but not limited to those related to the Facebook website, that infringe the '761 Patent and will continue to do so until enjoined by this Court.

10. Leader is informed and believes that, as a result of Facebook's unlawful activities, Leader has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law. Accordingly, Leader is entitled to preliminary and/or permanent injunctive relief pursuant to 35 U.S.C. § 283.

11. Leader is informed and believes that Facebook's infringement of the '761 Patent has been and continues to be willful and deliberate.

12. Leader is informed and believes that Facebook's infringement of the '761 Patent has injured and continues to injure Leader in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Leader prays that the Court grant the following relief and judgment:

A. A preliminary and permanent injunction against Facebook and its respective officers, employees, agents, servants, attorneys, instrumentalities, and/or those in privity with them, from infringing, contributorily infringing, or inducing the infringement of the '761 Patent and for all further and proper injunctive relief pursuant to 35 U.S.C. § 283;

B. An award to Leader of such damages as it shall prove at trial against Facebook that are adequate to fully compensate Leader for Facebook's infringement of the '761 Patent, said damages to be no less than a reasonable royalty;

C. An award to Leader for willful infringement against Facebook of three times the damages so determined, as provided by 35 U.S.C. § 284, together with prejudgment interest from the date infringement of the '761 Patent began and postjudgment interest;

D. A finding that this case is “exceptional” and an award to Leader of its costs and reasonable attorney’s fees, as provided by 35 U.S.C. § 285;

E. An accounting of all infringing sales and revenues; and

F. Such further and other relief as the Court and/or jury may deem proper and just.

DEMAND FOR JURY TRIAL

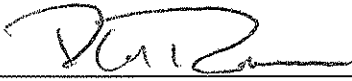
Leader hereby demands a trial by jury on all issues triable by a jury.

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