IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRITISH TELECOMMUNICATIONS PLC, Plaintiff, v. GOOGLE INC., Defendant.	)	C. A. No.: _____ **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff British Telecommunications plc ("BT"), by and through its undersigned counsel, for its Complaint against Defendant Google Inc. ("Google"), alleges as follows:

NATURE OF THIS ACTION

1. This is a patent infringement action brought by BT against Google based on Google's ongoing and pervasive infringement of BT patents, which include U.S. Patent No. 6,151,309 (entitled "Service Provision System for Communications Networks") (the "Busuioc" Patent), U.S. Patent No. 6,169,515 (entitled "Navigation Information System") (the "Mannings 1" Patent), U.S. Patent No. 6,397,040 (entitled "Telecommunications Apparatus and Method") (the "Titmuss 1" Patent), U.S. Patent No. 6,578,079 (entitled "Communications Node for Providing Network Based Information Service") (the "Gittins" Patent), U.S. Patent No. 6,650,284 (entitled "Information System") (the "Mannings 2" Patent), and U.S. Patent No. 6,826,598 (entitled "Storage and Retrieval of Location Based Information in a Distributed Network of Data Storage Devices") (the "Titmuss 2" Patent).

2. A true and correct copy of the Busuioc Patent is attached as Exhibit A.

3. A true and correct copy of the Mannings 1 Patent is attached as Exhibit B.

4. A true and correct copy of the Titmuss 1 Patent is attached as Exhibit C.

5. A true and correct copy of the Gittins Patent is attached as Exhibit D.

6. A true and correct copy of the Mannings 2 Patent is attached as Exhibit E.

7. A true and correct copy of the Titmuss 2 Patent is attached as Exhibit F.

8. BT seeks monetary damages and injunctive relief.

PARTIES

9. Plaintiff British Telecommunications plc is a corporation organized under the laws of England and Wales, and has its principal place of business at 81 Newgate Street, London EC1A 7AJ, United Kingdom.

10. Upon information and belief, Defendant Google Inc. is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California.

JURISDICTION AND VENUE

11. This is a civil action for patent infringement arising under the United States patent statutes, 35 U.S.C. § 100, *et seq.*

12. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

13. This Court has personal jurisdiction over Google because Google is organized and exists under the laws of the State of Delaware, and is a resident of the State of Delaware. Google also has conducted and does conduct business within the State of Delaware, and has designated The Corporation Trust Company as its agent for service of process in the State of Delaware.

14. Venue is proper in this District under 28 U.S.C. §§ 1391(b), 1391(c), and/or 1400(b), because Google conducts business and is subject to personal jurisdiction in this District.

FACTUAL BACKGROUND

BT

15. BT is the oldest telecommunications company in the world, tracing its origins back to the Electric Telegraph Company, which was incorporated in England in 1846. Today, after more than 160 years since its founding, BT provides communications services in 170 countries and employs more than 100,000 people worldwide.

16. From its earliest beginnings, BT has been on the forefront of research and innovation in the world of communications, starting with its adoption in the nineteenth century of leading-edge telegraphy technology, including the world's first commercial telegraph service.

17. BT has conducted much of that work at its renowned research facility at Adastral Park, near Ipswich in the county of Suffolk, England. Adastral Park has housed some of the leading technology researchers and engineers in the world, whose inventive efforts led to the issuance of more than 10,000 patents by the turn of the century. The innovations created at Adastral Park include the world's first instantaneous translation of speech by computer, advanced video-on-demand services, commercial optical fiber transmission, the world's fastest regenerator, and the world's first fully automated "spam buster" system to track down and tackle professional spammers.

18. Among those areas in which BT has invested heavily over the last twenty years have been mobility and related network services technologies, which BT recognized early on would revolutionize the way people communicate.

19. Extensive work in this field throughout the 1990s has led to numerous patents in the field of mobility, including the patents-in-suit.

Google

20. Google was founded a little over a decade ago, but now offers a broad range of products and services that incorporate pre-existing technologies invented by BT prior to Google's founding. After investigation, and upon information and belief, Google's products and services operate substantially as described hereinafter and those that infringe one or more of the patents-in-suit include, *inter alia,* Google's storage, retrieval and delivery of location-based information through its search engines, Android, AdMob, AdSense, AdWords, AdWords Express, DoubleClick, Gmail, Google+, Google Docs, Google Maps, Google Offers and Google Places.

21. Google has derived and will continue to derive substantial value from these products and services that incorporate BT's patented technologies. BT brings this action to recover the just compensation it is owed and to prevent Google from continuing to benefit from BT's inventions without authorization.

Google Infringes the Busuioc Patent

22. The Busuioc Patent (U.S. Patent No. 6,151,309) was issued by the United States Patent & Trademark Office ("USPTO") on November 21, 2000.

23. The Busuioc Patent is directed to systems and methods for accessing content in a mobile environment where network constraints vary across networks. By way of example, embodiments of the invention include providing services by means of a combination of communications networks in spite of differing capabilities on the bandwidth that is available in certain mobile networks.

24. As set forth below, Google Music and Google Android offer representative examples of Google's infringement of the Busuioc Patent.

Google Music

25. Google Music supports streaming music to desktop browsers and Android phones and tablets, among other devices.

26. Google Music maintains data relating to whether a particular music service is available or unavailable to its user based on whether the user is located in, and connected to, a WiFi hotspot or a cellular data network. A Google Music user can choose his or her settings to allow streaming of music only when the user is located in a WiFi hotspot and his or her device is connected to it. Google Music also continuously checks the type of network in which the user is located and to which the user's device is connected, and when the user's network location and connections change, it updates the data relating to the availability of its music services.

Google Android

27. Google Android is an operating system for mobile devices such as smartphones and tablet computers. Android comes equipped with various pre-installed applications ("apps"), including Browser, Email, Gallery and Android Market. Users can download and/or upload various files by using these apps.

28. Google Android maintains data relating to whether particular file download and/or upload services are available or unavailable to its user based on whether the user's device is connected to a WiFi hotspot or a cellular data network. For example, a Google Android user can choose his or her settings to allow downloading of a file in Browser and Android Market only when the user is located in a WiFi hotspot and his or her device is connected to that hotspot. Google Android continuously checks the type of network to which the user's device is connected, and when the user's network connection type changes, it updates data relating to the availability of its file download and/or upload services based on the user's network location.

Google Infringes the Mannings 1 Patent

29. The Mannings 1 Patent (U.S. Patent No. 6,169,515) was issued by the USPTO on January 2, 2001.

30. The Mannings 1 Patent arises out of an application filed in 1994 and is directed to a navigation system which includes a fixed part and at least one mobile part to provide guidance information to a user. By locating the geographical database and associated intelligence with the service provider, the system described in the Mannings 1 Patent allows for transmission of current guidance information to the mobile part rather than requiring a user to rely upon previously created geographical information such as might have been loaded onto a CD-ROM in a mobile computer.

31. While the Mannings 1 Patent contemplates transmission of route and traffic information to a motor vehicle, guidance information may take the form of other locality-dependent information. Guidance to public transportation, tourist attractions and other local facilities are expressly identified as examples of guidance information. In providing guidance to users, the Mannings 1 Patent provides the same guidance information to users located in a discrete predetermined area overlying a given geography wherein those users are currently located.

32. As set forth below, Google Maps offers a representative example of Google's infringement of the Mannings 1 Patent.

Google Maps

33. Google Maps is an online mapping service application and technology that powers many map-based services.

34. From tracking information transmitted from a mobile part associated with a Google Maps user, Google Maps determines the location of the user in relation to one or more discrete predetermined map overlay areas. An overlay area may correspond to a map tile in relation to which Google stores and transmits guidance information to users located within that overlay area.

35. Google Maps transmits guidance information pertaining to public transportation stops, tourist attractions and local facilities present in an overlay area to all users within that overlay area. Similarly, traffic and route guidance may also be provided. In providing guidance information in this fashion, Google has built Google Maps upon the foundation provided by the Mannings 1 Patent and infringes upon its claims.

Google Infringes the Titmuss 1 Patent

36. The Titmuss 1 Patent (U.S. Patent No. 6,397,040) was issued by the USPTO on May 28, 2002.

37. The Titmuss 1 Patent is directed to systems and methods for generating and transmitting shortlists of sources of information dependent upon the location of a user. Mobile users may be provided with shortlists of information sources along with summaries for the information, such as the contents of web pages, from which a particular source may be selected to retrieve information. By way of example, these lists may relate to sources of information respecting services, facilities, friends and transportation and may be generated in accordance with user preferences.

38. As set forth below, Google Maps, Google Search, Google Places, Google's location-based advertising, Google Offers, and Google+ offer representative examples of Google's infringement of the Titmuss 1 Patent.

Google Maps

39. As noted above, Google Maps is an online mapping service application and technology that powers many map-based services.

40. Google Maps provides sources of information, which may include World Wide Web pages accessible by URLs, to users over the Internet via wired and/or wireless networks, based on the location of the user. For example, Google Maps tracks the location of the user by receiving the user's tracking information, accesses location data relating to the localities that are relevant to the user's tracked location, and generates and transmits a shortlist of information sources, along with summaries for the contents of information, that are found on the basis of the user's tracking information and the location data.

41. Google Maps also generates shortlists of information sources in accordance with user preference data. A user who has provided ratings of places receives a different shortlist than a regular Maps user who has neither used Google Places nor provided ratings. Consequently, shortlists may be generated on the basis of user location in combination with user preference data.

Google Search

42. Google Search, on desktop computers, laptop computers and mobile devices, provides sources of information, which may include World Wide Web pages accessible by URLs, to users over the Internet via wired and/or wireless networks, based on the location of the user. For example, when a user accesses www.google.com on a computer or a mobile device and types in a search term, Google tracks the location of the user's computer or mobile device by receiving tracking information, and generates and transmits a shortlist of information sources,

along with summaries for the contents of information, that are found on the basis of the user's tracking information and the location data.

43. Google Search not only generates shortlists of information based on location, but also on the basis of stored user preference data. By way of example, HTTP cookies may be used to store user preferences, Google may track a user's web history to determine preferences, and social connections may also be used to generate location-based shortlists of information that also correspond to user preferences.

Google Places

44. Google Places allows users to access information relating to businesses based on location information.

45. Google Places provides a shortlist of sources of information, which may include World Wide Web pages accessible by URLs, to users over the Internet via wired and/or wireless networks, based on the location of the user. For example, when a user accesses Google Places through www.google.com or Google Maps, Google tracks the location of the user by receiving tracking information and accesses from Google's server the location data relating to the localities that are relevant to the user's tracked location. It then generates and transmits a shortlist of information sources, along with summaries for the contents of information sources, on the basis of the user's tracking information and the location data.

46. Google Places also generates shortlists on the basis of user preference. As reflected in Google's "Discover new places" page, Google provides shortlists that provide customized recommendations based on a user's past web history and ratings of places the user has visited. Shortlists of information sources are generated accordingly.

Google Offers

47. Google Offers is a deal-of-the-day website localized to major geographic markets in the United States.

48. Google Offers provides a shortlist of sources of information, which may include World Wide Web pages accessible by URLs, to users over the Internet via wired and/or wireless networks, based on the location of the user. For example, when a user accesses Google Offers (www.google.com/offers), Google tracks the location of the user's computer or mobile device by receiving tracking information, and generates and transmits a shortlist of information sources, along with summaries for the contents of information, that are found on the basis of the user's tracking information and the location data.

49. Google Offers also generates shortlists on the basis of user preference. Google Offers has "Personalization Settings," which allow a user to provide Google with information as to the types of deals in which a user is interested, and that information is used for generating shortlists of information sources based on user preference as well as location.

Google's Location-Based Advertising

50. Google provides location-based advertising services that generate and transmit shortlists of sources of information in the form of location-based advertisements. Among other things, these services include Google's advertising programs such as AdWords, AdWords Express, AdSense, and AdMob.

51. Google's location-based advertising programs utilize user preference information in order to generate shortlists of information sources in at least two ways. The first is to track a user's history to determine what ads will be most relevant and generate shortlists of information sources on the basis of user interest as well as location. Google's own site

(http://www.google.com/ads/preferences/html/about.html) explains how Google creates interest-based advertising by tracking those websites a user has visited and generating advertisements that corresponds to user preferences reflected in past website visits, as well as location. Another way in which shortlists may reflect user preferences as well as location is to generate them out of stored preferences actually identified by users, *e.g.*, a user's own explicit identification of what it is that is of interest to him or her, such as the user's "+1" data in his or her Google account.

52. The "+1" personalization allows Google to tailor advertisements to a user and content seen by the user according to preferences that have been stored by that user. Google has also introduced the +1 button to advertisements themselves and informs AdSense publishers that +1's of advertisements directly affect the composition of advertisement units shown to users.

Google+

53. Google+ is a social networking service that is provided by Google.

54. Google+ provides its users with sources of information, which may include World Wide Web pages accessible by URLs containing information about local Google+ users, over the Internet via wired and/or wireless networks based on the location of the user. For example, Google+, when used on a mobile phone, tracks the location of the user by receiving tracking information from the mobile phone's location tracking mechanism, and accesses from Google's server the location data relating to the localities that are relevant to the user's tracked location. Google+ then generates and transmits a shortlist of information sources, along with summaries for the contents of information, that are found on the basis of the user's tracking information and the location data.

Google Infringes the Gittins Patent

55. The Gittins Patent (U.S. Patent No. 6,578,079) was issued by the USPTO on June 10, 2003.

56. The Gittins Patent teaches, among other things, systems and methods for providing a network-based information service in a communications network by storing customer identities, respective customer-associated lists of identities of information items for which the respective associated customer has access rights, and identities of item-associated information sources which store the respective items.

57. As set forth below, Google's Android Market, Google Books and Google Music offer representative examples of Google's infringement of the Gittins Patent.

Google's Android Market

58. Google's Android Market is a service allowing users to obtain software and other information such as movie and book contents.

59. Google's Android Market utilizes user identities in Google's servers, maintains a list of items (*e.g.*, Android apps, movies and books) that each user can access, and, for each such item, provides the identity of the source of the item's contents. Once Google verifies the provided login credentials and/or authentication tokens, it offers the list of items that the user is entitled to access. Then, at the user's request, Google retrieves the selected item's contents.

Google Books & eBooks

60. Google Books and eBooks (collectively, "Google Books") allow users to search the full text of books stored in its digital database and gain access to their contents.

61. Google Books utilizes customer identities stored on Google's servers, and for each Google Books user in the database, maintains a list of items (*e.g.*, books) that each user can

access, such as those books that are available for free and those that had been purchased by the user. Once Google verifies the provided login credentials and/or authentication tokens, it retrieves the list of books that the user is entitled to access. Then, upon receiving the identity of a desired item from the user, Google retrieves the contents and sends it to the user's device.

Google Music

62. As set forth above, Google Music supports streaming music to computer browsers and Android phones and tablets, among other devices.

63. Google Music utilizes customer identities stored on Google's servers, and for each Google Music user in the database, maintains a list of items (*e.g.*, music files) that each user can access, such as the songs that are available for free and those that had been purchased by the user. Once Google verifies the provided login credentials and/or authentication tokens, it retrieves the list of items (*e.g.*, music albums and songs) that the Google Music user is entitled to access. Upon receiving the identity of a desired item from the user, Google retrieves the contents and sends it to the user's device.

Google Infringes the Mannings 2 Patent

64. The Mannings 2 Patent (U.S. Patent No. 6,650,284) was issued by the USPTO on November 18, 2003.

65. The Mannings 2 Patent contains the same disclosure as the Mannings 1 Patent and is directed to one particular inventive feature of the navigation systems disclosed in it. In particular, the claims are directed to a method and apparatus for providing information to a mobile part in which the route may be affected by a physical characteristic of the vehicle with which the mobile part is associated.

66. Google Maps, as described above, provides guidance information in which a route may change depending upon the physical characteristics of the vehicle with which a mobile part is associated. By way of example, different route information is provided to a user carrying a mobile device depending upon the user's mode of transportation (*e.g.*, bicycle or car).

Google Infringes the Titmuss 2 Patent

67. The Titmuss 2 Patent (U.S. Patent No. 6,826,598) was issued by the USPTO on November 30, 2004.

68. The Titmuss 2 Patent is directed, among other things, to systems and methods for storing and/or retrieving location-based information. By employing a distributed network and contemplating distributed processing, Titmuss 2 allows for rapid storage and retrieval of location-specific information stored across the distributed network where such information is accessible simultaneously from a plurality of remote user terminals.

69. In one embodiment also employed by Google, the Titmuss 2 patent describes a distributed network of data storage devices accessible simultaneously from a plurality of remote user terminals wherein data access nodes within the network are responsible for predefined localities. References to information sources containing information relating to given localities are indexed at such nodes. Different information may be indexed at higher level nodes than at lower level nodes, yet some of the same information may also be repeatedly indexed at differing levels of nodes. In this fashion, greater levels of specificity in identifying location-based information sources may be provided at different zoom levels, while some location-based information sources may be repeatedly identified at multiple zoom levels.

70. In yet another embodiment of the invention practiced by Google, the locality of interest for location-based information sources is determined as a function of a mobile user's speed of travel. It may also be determined in accordance with the user's direction of travel.

71. As set forth below, Google Maps and Google Maps Navigation offer representative examples of Google's infringement of the Titmuss 2 Patent in the creation of the systems utilized by Google to store, retrieve and transmit location-based sources of information.

Google Maps & Google Maps Navigation

72. As set forth above, Google Maps is an online mapping service application that powers many map-based services.

73. Google Maps is organized in tiles, stored in a distributed network of data storage devices, covering the surface of the earth. Each tile represents a known area specified in longitude and latitude at a given zoom level, and has various data associated with it, such as data relating to its latitude/longitude and data relating to how to access it over the Internet. Based on the zoom level of the user's map interface and the location of the user's interest, Google Maps determines which map tiles to retrieve from the distributed network of data storage devices so as to enable the user's access to the tiles as well as references for information sources associated with such tiles, such as links to information about local businesses.

74. Google Maps Navigation is an Internet-connected GPS navigation system with voice guidance that displays a map on the user's terminal corresponding to the locality of interest to the user. Google Maps Navigation also selects information sources from which locality-specific information can be retrieved, and displays them on the map interface to allow the user's access to such information. The displayed map corresponding to the locality of interest is affected by the user's speed and/or direction of travel.

COUNT I
(INFRINGEMENT OF U.S. PATENT NO. 6,151,309)

75. BT repeats and realleges the allegations contained in Paragraphs 1 through 74 above as if fully set forth herein.

76. Through lawful assignment, BT is the lawful owner of all rights, title and interest in the Busuioc Patent, including the right to sue for patent infringement and damages.

77. Google has infringed and continues to infringe, and following filing will be willfully infringing, literally and/or under the doctrine of equivalents, one or more claims of the Busuioc Patent by making, using, licensing, offering to sell, selling (directly or through intermediaries), importing and/or supplying, in this District and elsewhere in the United States, products and services, including but not limited to Google Music and Google Android, that are claimed in and/or perform the methods claimed in the Busuioc Patent without authority or license from BT.

78. Upon information and belief, such products and services, including but not limited to Google Music and Google Android, are especially designed to be used by customers in such a way that infringes the Busuioc Patent, lack substantial non-infringing uses, and have been used by customers to infringe the Busuioc Patent. Google's continuation of past practices following receipt of this Complaint will constitute inducement of infringement and/or contributory infringement and give rise to indirect, as well as direct, infringement.

79. BT has been damaged and continues to be damaged by Google's infringement of the Busuioc Patent.

COUNT II
(INFRINGEMENT OF U.S. PATENT NO. 6,169,515)

80. BT repeats and realleges the allegations contained in Paragraphs 1 through 74 above as if fully set forth herein.

81. Through lawful assignment, BT is the lawful owner of all rights, title and interest in the Mannings 1 Patent, including the right to sue for patent infringement and damages.

82. Google has infringed and continues to infringe, and following filing will be willfully infringing, literally and/or under the doctrine of equivalents, one or more claims of the Mannings 1 Patent by making, using, licensing, offering to sell, selling (directly or through intermediaries), importing and/or supplying, in this District and elsewhere in the United States, products and services, including but not limited to Google Maps and Google Maps Navigation and the navigational guidance provided in association with it, as claimed in the Mannings 1 Patent, and/or performing the methods claimed in it, without authority or license from BT.

83. Such products and services are especially designed to be used by customers in such a way that infringes the Mannings 1 Patent, lack substantial non-infringing uses, and have been used by customers to infringe the Mannings 1 Patent. Google's continuation of past practices following receipt of this Complaint will constitute inducement of infringement and/or contributory infringement and give rise to indirect, as well as direct, infringement.

84. BT has been damaged and continues to be damaged by Google's infringement of the Mannings 1 Patent.

COUNT III
(INFRINGEMENT OF U.S. PATENT NO. 6,397,040)

85. BT repeats and realleges the allegations contained in Paragraphs 1 through 74 above as if fully set forth herein.

86. Through lawful assignment, BT is the lawful owner of all rights, title and interest in the Titmuss 1 Patent, including the right to sue for patent infringement and damages.

87. Google has infringed and continues to infringe, and following filing will be willfully infringing, literally and/or under the doctrine of equivalents, one or more claims of the Titmuss 1 Patent by making, using, licensing, offering to sell, selling (directly or through intermediaries), importing and/or supplying, in this District and elsewhere in the United States, products and services, including but not limited to Google Maps, Google Search, Google Places, Google's location-based advertising, and Google+ that are claimed in and/or perform the methods claimed in the Titmuss 1 Patent without authority or license from BT.

88. Such products and services, including but not limited to Google Maps, Google Search, Google Places, Google's location-based advertising, Google Offers and Google+, are especially designed to be used by customers in such a way that infringes the Titmuss 1 Patent, lack substantial non-infringing uses, and have been used by customers to infringe the Titmuss 1 Patent. Google's continuation of past practices following receipt of this Complaint will constitute inducement of infringement and/or contributory infringement and give rise to indirect, as well as direct, infringement.

89. BT has been damaged and continues to be damaged by Google's infringement of the Titmuss 1 Patent.

COUNT IV
(INFRINGEMENT OF U.S. PATENT NO. 6,578,079)

90. BT repeats and realleges the allegations contained in Paragraphs 1 through 74 above as if fully set forth herein.

91. Through lawful assignment, BT is the lawful owner of all rights, title and interest in the Gittins Patent, including the right to sue for patent infringement and damages.

92. Google has infringed and continues to infringe, and following filing will be willfully infringing, literally and/or under the doctrine of equivalents, one or more claims of the Gittins Patent by making, using, licensing, offering to sell, selling (directly or through intermediaries), importing and/or supplying, in this District and elsewhere in the United States, products and services, including but not limited to Google's Android Market, Google Books and Google Music, that are claimed in and/or perform the methods claimed in the Gittins Patent without authority or license from BT.

93. Such products and services, including but not limited to Google's Android Market, Google Books and Google Music, are especially designed to be used by customers in such a way that infringes the Gittins Patent, lack substantial non-infringing uses, and have been used by customers to infringe the Gittins Patent. Google's continuation of past practices following receipt of this Complaint will constitute inducement of infringement and/or contributory infringement and give rise to indirect, as well as direct, infringement.

94. BT has been damaged and continues to be damaged by Google's infringement of the Gittins Patent.

COUNT V
(INFRINGEMENT OF U.S. PATENT NO. 6,650,284)

95. BT repeats and realleges the allegations contained in Paragraphs 1 through 74 above as if fully set forth herein.

96. Through lawful assignment, BT is the lawful owner of all rights, title and interest in the Mannings 2 Patent, including the right to sue for patent infringement and damages.

97. Google has infringed and continues to infringe, and following filing will be willfully infringing, literally and/or under the doctrine of equivalents, one or more claims of the Mannings 2 Patent by making, using, licensing, offering to sell, selling (directly or through

intermediaries), importing and/or supplying, in this District and elsewhere in the United States, products and services, including but not limited to Google Maps and Google Maps Navigation, that are claimed in and/or perform the methods claimed in the Mannings 2 Patent without authority or license from BT.

98. Such products and services, including but not limited to Google Maps and Google Maps Navigation, are especially designed to be used by customers in such a way that infringes the Mannings 2 Patent, lack substantial non-infringing uses, and have been used by customers to infringe the Mannings 2 Patent. Google's continuation of past practices following receipt of this Complaint will constitute inducement of infringement and/or contributory infringement and give rise to indirect, as well as direct, infringement.

99. BT has been damaged and continues to be damaged by Google's infringement of the Mannings 2 Patent.

COUNT VI
(INFRINGEMENT OF U.S. PATENT NO. 6,826,598)

100. BT repeats and realleges the allegations contained in Paragraphs 1 through 74 above as if fully set forth herein.

101. Through lawful assignment, BT is the lawful owner of all rights, title and interest in the Titmuss 2 Patent, including the right to sue for patent infringement and damages.

102. Google has infringed and continues to infringe, and following filing will be willfully infringing, literally and/or under the doctrine of equivalents, one or more claims of the Titmuss 2 Patent by making, using, licensing, offering to sell, selling (directly or through intermediaries), importing and/or supplying, in this District and elsewhere in the United States, products and services, including but not limited to Google Maps and Google Maps Navigation,

that are claimed in and/or perform the methods claimed in the Titmuss 2 Patent without authority or license from BT.

103. Such products and services, including but not limited to Google Maps and Google Maps Navigation, are especially designed to be used by customers in such a way that infringes the Titmuss 2 Patent, lack substantial non-infringing uses, and have been used by customers to infringe the Titmuss 2 Patent. Google's continuation of past practices following receipt of this Complaint will constitute inducement of infringement and/or contributory infringement and give rise to indirect, as well as direct, infringement.

104. BT has been damaged and continues to be damaged by Google's infringement of the Titmuss 2 Patent.

PRAYER FOR RELIEF

WHEREFORE, BT respectfully requests that this Court enter judgment against Google, granting BT the following relief:

A. A judgment holding Google liable for direct infringement under 35 U.S.C. § 271(a), indirect infringement under 35 U.S.C. § 271(b) and/or (c), and/or infringement under 35 U.S.C. § 271(f) of the Busuioc, Mannings 1, Titmuss 1, Gittins, Mannings 2, and Titmuss 2 Patents;

B. An injunction against Google, its respective officers, agents, servants, employees, attorneys, parent and subsidiary entities, assigns and successors in interest, and those persons in active concert or participation with them, enjoining them from continued acts of infringement of the Busuioc, Mannings 1, Titmuss 1, Gittins, Mannings 2, and Titmuss 2 Patents;

C. Damages resulting from Google's infringement of the Busuioc, Mannings 1, Titmuss 1, Gittins, Mannings 2, and Titmuss 2 Patents in an amount to be proven at trial, but no less than a reasonable royalty, together with pre-judgment interest and post-judgment interest;

D. A judgment holding Google's infringement of the Busuioc, Mannings 1, Titmuss 1, Gittins, Mannings 2, and Titmuss 2 Patents to be willful and deliberate, and a trebling of damages pursuant to 35 U.S.C. § 284;

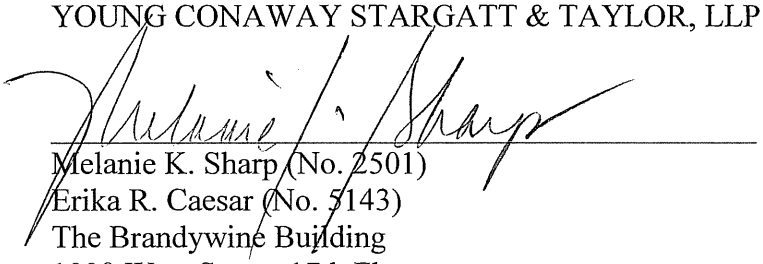
E. A judgment holding this to be an exceptional case, and an award to BT for its attorneys' fees, costs and expenses incurred prosecuting this action pursuant to 35 U.S.C. § 285; and

F. Such other and further relief as the Court deems just and equitable.

DEMAND FOR JURY TRIAL

BT demands a trial by jury of all issues so triable.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



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**pro hac vice motions to be filed*

Dated: December 15, 2011

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