

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

14 JAN 31 PM 2: 04
SOUTHERN DISTRICT
OF INDIANA
LAURA A. BRIGGS
CLERK

ONE NUMBER CORPORATION,)
)
Plaintiff)
)
v.)
)
GOOGLE, INC.,)
)
Defendant)

Case No.

1 : 14 -cv- 0142 LJM -DML

COMPLAINT FOR PATENT INFRINGEMENT

One Number Corporation ("1Num"), by counsel, for its Complaint for Patent Infringement against Google, Inc. ("Google"), alleges and states:

1. This action arises under the Patent Laws of the United States, 35 U.S.C. §§ 1 *et seq.*

2. On December 17, 2013, the United States Patent and Trademark Office ("USPTO") issued United States Letters Patent No. 8,611,511 ("the '511 patent") to 1Num for an invention titled a "Contact Number Encapsulation System." *See Exhibit 1 attached and incorporated herein by reference.* 1Num owned the '511 Patent throughout the period of the defendant's infringing acts and still owns the '511 Patent.

3. Google has infringed and is still willfully infringing the '511 Patent by making, selling, and using a "Contact Number Encapsulation System" that embodies the patented invention, and Google will continue to do so unless enjoined by this

court.

4. 1Num has given Google written notice of the infringement.

5. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1338(a), and 1400(b).

6. This Court has personal jurisdiction over Google because, *inter alia*, it has committed, or aided, abetted, contributed to, or participated in the commission of, patent infringement that has led to foreseeable harm and injury to 1Num in Anderson, Indiana. Google offers its infringing Google Voice services throughout Indiana and elsewhere. This Court also has personal jurisdiction over Google by virtue of its systematic and continuous contacts with Indiana.

7. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

8. 1Num has been, and continues to be, damaged as a result of Google's infringement of the '511 Patent.

Wherefore, 1Num respectfully demands judgment in its favor against Google, a final injunction against the continuing infringement, an accounting for damages, interest, costs and attorneys' fees, and all other just and proper relief.

DEMAND FOR TRIAL BY JURY

Plaintiff demands a trial by jury of all claims triable by a jury.

Date: January 31, 2014



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