

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
COVINGTON DIVISION**

iLOR, LLC

1710 Alexandria Dr., Ste. 4
Lexington, KY 40504

Plaintiff,

v.

GOOGLE, INC.

1600 Amphitheatre Parkway
Mountain View, CA 94043

Statutory Agent:

CSC - Lawyers Incorporating Service
PO Box 526036
Sacramento, CA 95852

Defendant.

COMPLAINT WITH JURY DEMAND

Plaintiff, iLOR, LLC (“iLOR”), by and through undersigned counsel and for its
Complaint against Google, Inc. (“Google”), states as follows:

THE PARTIES

1. Plaintiff iLOR is a corporation organized and existing under the laws of the State of Kentucky, having its principal place of business in this District at 1710 Alexandria Dr. Ste 4, Lexington, KY 40504 in Fayette County. iLOR is in the business of, among other things, developing internet based search solutions, particularly for social search applications.
2. Upon information and belief, Google is a Delaware corporation with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California in Santa Clara County. In addition, on information and belief, Google advertises, solicits clients, and

conducts substantial amounts of business in Kentucky and within this District in particular.

3. This is a civil action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.
4. The Court has jurisdiction over the subject matter of this action under Title 28 United States Code, §§ 1331 and 1338(a).
5. Venue is proper in this District under Title 28 of the United States Code, §§ 1391(b) & (c) and 1400(b).
6. On April 17, 2007, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,206,839 (“the ‘839 Patent”) entitled “Method for Adding a User Selectable Function to a Hyperlink.” A copy of the ‘839 patent is attached hereto as Exhibit A.
7. iLOR is presently the sole and exclusive assignee of the entire right, title, and interest in and to the ‘839 patent.
8. Upon information and belief, Google is infringing the ‘839 patent.
9. iLOR has been, and continues to be, damaged by the infringing activities of Google.
10. Google will continue its infringing activities unless enjoined by this Court. iLOR has been, and will continue to be, irreparably harmed unless Google is enjoined from the actions complained of herein.

WHEREFORE, iLOR requests the following relief:

- A. entry of a final judgment holding Google liable for infringing the ‘839 patent;
- B. entry of an order permanently enjoining Google, its officers, agents, servants, employees, attorneys, parent and subsidiary corporations, assigns and successors in

interest, and those persons in active concert or participation with them, from further infringing the '839 patent;

C. an award of damages adequate to compensate iLOR for the infringement of the '839 patent by Google with prejudgment and post-judgment interest and costs as fixed by the Court as provided by 35 U.S.C. § 284;

D. entry of an order finding that Google's infringement has been willful, and a trebling of the damages awarded pursuant to 35 U.S.C. § 284;

E. a judgment holding this action to be an exceptional case, and an award to iLOR for its attorneys' fees pursuant to 35 U.S.C. § 285; and

F. such other relief as the Court deems just and equitable.

Respectfully submitted,

Dated: April 17, 2007

s/ Susan Grogan Faller
Susan Grogan Faller (82812)
Frost Brown Todd, LLC
2200 PNC Center
201 East Fifth Street
Cincinnati, OH 45202-4182
(513) 651-6641 Phone
(513) 651-6981 Fax
sfaller@fbtlaw.com

David E. Schmit (Ohio Bar. # 0021147)
FROST BROWN TODD LLC
2200 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202-4182
(513) 651-6985
(513) 651-6981 (fax)
dschmit@fbtlaw.com

*Attorneys for Plaintiff
iLOR LLC.*