

EXHIBIT 4

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNILOC USA, INC. and
UNILOC SINGAPORE PRIVATE LIMITED

Plaintiffs,

vs.

MICROSOFT CORPORATION,
UNICOM TECHNOLOGY GROUP, INC., and
ALADDIN KNOWLEDGE SYSTEMS INC.

Defendants.



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Civ. A. No.

JURY TRIAL DEMANDED

COMPLAINT

Plaintiffs Uniloc USA, Inc. and Uniloc Singapore Private Limited (together "Uniloc" or "Plaintiffs") as and for their Complaint against defendants Microsoft Corporation, Unicom Technology Group, Inc. and Aladdin Knowledge Systems Inc. (together "Defendants") allege as follows:

JURISDICTION AND VENUE

1. This action arises under the patent laws of the United States, 35 U.S.C. § 271 et seq. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).
2. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b), (c) and §1400(b).

PARTIES

3. Plaintiff Uniloc USA, Inc. is a Rhode Island corporation having a principal place of business at 1 Richmond Square, Providence, Rhode Island 02906.

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4. Plaintiff Uniloc Singapore Private Limited is a Singapore Corporation having a principal place of business at Six Battery Road # 38-01, Singapore 0104.
5. Defendant Microsoft Corporation ("Microsoft") is a Washington corporation having a principal place of business at One Microsoft Way in Redmond, Washington 98052 and is registered to do business in Rhode Island and is doing business and committing acts of patent infringement in this judicial district and elsewhere.
6. Defendant Unicom Technology Group, Inc. ("Unicom") is a Rhode Island corporation having a principal place of business at 1026 Park East Drive in Woonsocket, Rhode Island 02895 and is doing business and committing acts of patent infringement in this judicial district and elsewhere.
7. Defendant Aladdin Knowledge Systems Inc. ("Aladdin") is a New York Corporation having a principal place of business at 2920 North Arlington Heights Road in Arlington Heights, Illinois 60004 and is doing business and committing acts of patent infringement in this judicial district and elsewhere.

COUNT I

(Infringement of U.S. Patent No. 5,490,216)

8. The allegations of paragraphs 1 - 7 above are incorporated herein by reference.
9. This claim is made under the provisions of the patent laws of the United States, 35 U.S.C. § 271 et seq.
10. Plaintiff Uniloc Singapore Private Limited is the owner of U.S. Patent No. 5,490,216 ("the '216 patent") that was duly and legally issued on February 6, 1996 and is entitled "System for Software Registration". Plaintiff Uniloc USA, Inc. is the exclusive licensee of the '216 patent in the United States and possesses the right to enforce the '216 patent in the United States.

11. In violation of one or more provisions of 35 U.S.C. § 271, Defendants have infringed, and continue to infringe one or more of the claims of the '216 patent by making, using, selling and/or offering for sale, *inter alia*, anti-piracy and product activation technology products in this judicial district and elsewhere.

12. Defendants' acts of infringement are willful.

13. Defendants' acts of infringement have caused reparable and irreparable damage to Plaintiffs and Plaintiffs will continue to suffer damage unless Defendants are enjoined.

WHEREFORE, Plaintiffs pray that the Court:

- A. Enter judgment that Defendants have infringed U.S. Patent No. 5,490,216;
- B. Enter judgment that Defendants' acts of patent infringement are willful;
- C. Temporarily, preliminarily and permanently enjoin Defendants, their parents, subsidiaries, affiliates, divisions, officers, agents, servants, employees, directors, partners, representatives, and all parties in active concert and/or participation with them, from engaging in the aforesaid unlawful acts of infringement;
- D. Order Defendants to account for and pay to Plaintiffs all damages caused to Plaintiffs by Defendants' unlawful acts;
- E. Award Plaintiffs increased damages and attorney fees pursuant to 35 U.S.C. §§ 284 and 285;
- F. Award Plaintiffs their interest and costs incurred in this action; and
- G. Grant Plaintiff such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs demand a jury trial of all issues triable of right by jury.

UNILOC USA, INC.

UNILOC SINGAPORE PRIVATE LIMITED

Dated: 9/26/03

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