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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

1ST TECHNOLOGY LLC, Plaintiff. v. SPORTINGBET PLC, NDS GROUP PLC, ONGAME E-SOLUTIONS AB, and ORBIS TECHNOLOGY, Defendants.	CV-S-05-0788-RLH-PAL **JURY DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff 1st Technology LLC ("1st Technology"), complains of defendants Sportingbet PLC, NDS Group PLC, Ongame e-solutions AB and Orbis Technology (collectively "Defendants") as follows:

JURISDICTION AND VENUE

1. Jurisdiction exists under 28 U.S.C. § 1338(a) because defendants are charged with patent infringement under 35 U.S.C. § 271.

2. Defendants each have transacted business in this judicial district by making, using, selling or offering to sell and distributing software products that violate 1st Technology's patents either in this judicial district or in the United States.

3. Venue is proper under 28 U.S.C. §§ 1391(d) and 1400(b).

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PARTIES

4. 1st Technology is a California limited liability company with offices at 654 North Santa Cruz Avenue #C169, Los Gatos, California 95030. 1st Technology is the assignee of and owns all right, title and interest in and has standing to sue for infringement of United States Patent No. 5,564,001 entitled "Method and System for Interactively Transmitting Multimedia Information Over a Network Which Requires Reduced Bandwidth" ("the '001 Patent"), United States Patent No. 5,745,379 entitled "Method for the Production and Transmission of Enhanced Multimedia Information" ("the '379 Patent") and United States Patent No. 5,845,088 entitled "Method for the Production and Transmission of Enhanced Interactive Multimedia Information" ("the '088 Patent") (collectively "the Lewis Multimedia Patents").

5. Sportingbet PLC ("Sportingbet") is a foreign corporation with offices at 82-100 City Road 6th Floor, Transworld House, London EC1Y 2BY, United Kingdom. Sportingbet has made, sold, offered for sale, offers for sale and/or imports software products that infringe one or more claims of the Lewis Multimedia Patents. Sportingbet has infringed the Lewis Multimedia Patents either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

6. NDS Group PLC ("NDS") is a foreign company with offices at One London Road, Staines, Middlesex TW18 4EX, United Kingdom. NDS has made, sold, offered for sale, offers for sale and/or imports software products that infringe one or more claims of the Lewis Multimedia Patents. NDS has infringed the Lewis Multimedia Patents either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

7. Ongame e-solutions AB ("Ongame") is a foreign company with offices at Dragarbrunnsgatan 50 , Svavagallerlan, Smedsgränd 3, 753 20 Uppsala, Uppsala, Sweden. Ongame has made, sold, offered for sale, offers for sale and/or imports software products that infringe one or more claims of the Lewis Multimedia Patents. Ongame has infringed the Lewis Multimedia Patents either directly or through acts of contributory infringement

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or inducement in violation of 35 U.S.C. § 271.

8. Orbis Technology ("Orbis") is a foreign company with offices at 414 Chiswick High Road, London W4 5TF, United Kingdom. Orbis has made, sold, offered for sale, offers for sale and/or imports software products that infringe one or more claims of the Lewis Multimedia Patents. Orbis has infringed the Lewis Multimedia Patents either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

BACKGROUND

9. Dr. Scott Lewis ("Dr. Lewis") is an individual residing in Los Gatos, California. Dr. Lewis is the controlling manager of 1st Technology LLC. Dr. Lewis is the inventor of the '001 Patent, the '379 Patent and the '088 Patent.

10. Dr. Lewis received B.S. and M.S. degrees with honors in mechanical and electrical engineering from M.I.T. Dr. Lewis has a Ph.D. from Oxford University in adaptive digital signal processing as a Marshall Scholar and an M.B.A. from Harvard Business School. Dr. Lewis led the development of single-chip video and audio compression solutions, as well as the first automotive video cellular telephone.

11. Dr. Lewis is the inventor of a number of patents in multimedia communication technology including the separation, processing and recombination of multiple streams of multimedia data. This processing can include enhancement, compression and other forms of data manipulation. The inventions of Dr. Lewis' patents are used in many online wagering systems.

PATENT INFRINGEMENT

12. Each of the Defendants has infringed the Lewis Multimedia Patents either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

13. Sportingbet PLC has infringed at least Claim 1 of the '379 Patent, at least Claim 26 of the '001 Patent, and at least Claim 1 of the '088 Patent.

14. NDS Group PLC has infringed at least Claim 1 of the '379 Patent, at least Claim 26 of the

'001 Patent, and at least Claim 1 of the '088 Patent.

15. Ongame e-solutions AB has infringed at least Claim 1 of the '379 Patent, at least Claim 26 of the '001 Patent, and at least Claim 1 of the '088 Patent.

16. Orbis Technology has infringed at least Claim 1 of the '379 Patent, at least Claim 26 of the '001 Patent, and at least Claim 1 of the '088 Patent.

17. Defendants' infringement, contributory infringement and/or inducement to infringe has injured 1st Technology and it, therefore, is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

18. Defendants' infringement, contributory infringement and/or inducement to infringe has been willful and deliberate because each Defendant has been given notice of or knew of the Lewis Multimedia Patents and has nonetheless injured and will continue to injure 1st Technology, unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further manufacture, use, sale and/or offer for sale of products or services that come within the scope of the Lewis Multimedia Patents.

JURY DEMAND

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, 1st Technology requests a trial by jury on all issues presented that can properly be tried to a jury.

WHEREFORE, plaintiff, 1st Technology, asks this Court to enter judgment, individually and jointly against defendants Sportingbet PLC, NDS Group PLC, Ongame e-solutions AB, and Orbis Technology and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

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A. An award of damages adequate to compensate 1st Technology for the infringement that has occurred, together with prejudgment interest from the date infringement began;

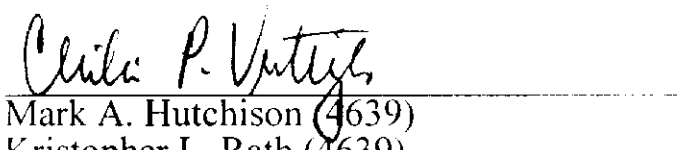
B. All other damages permitted by 35 U.S.C. § 284;

C. A finding that this case is exceptional and an award to 1st Technology of attorneys' fees and costs as provided by 35 U.S.C. § 285;

D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the Lewis Multimedia Patents; and,

E. Such other and further relief as this Court or a jury may deem proper and just.

Respectfully submitted,



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