

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CORELOGIC SOLUTIONS, LLC,

Plaintiff,

v.

COLLATERAL INTELLIGENCE LLC,

Defendant.

CIVIL ACTION NO. 2:12-cv-304

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff CoreLogic Solutions, LLC (“Plaintiff” or “CoreLogic”) for its complaint against Defendant Collateral Intelligence LLC (“Collateral Intelligence”) hereby alleges as follows:

PARTIES

1. Plaintiff CoreLogic is a Delaware corporation with its principal place of business at 4 First American Way, Santa Ana, California 92707.
2. On information and belief, Defendant Collateral Intelligence is a Delaware limited liability corporation with its principal place of business at 11 Huron Drive, Ste. 202, Natick, Massachusetts 01760. Defendant Collateral Intelligence makes, imports, uses, offers to sell, and/or sells within the United States, including the state of Texas and the judicial district, products, including, but not limited to, AVMs for real estate appraisal.

JURISDICTION AND VENUE

3. This infringement action arises under the patent laws of the United States, Title 35, United States Code. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and 1338(a).

4. Upon information and belief, this Court has personal jurisdiction over Collateral Intelligence because Collateral Intelligence has conducted – and continues to conduct – business on a systematic and continuous basis within the United States, including the State of Texas and this judicial district.

5. Collateral Intelligence has minimum contacts with the Eastern District of Texas such that this venue is fair and reasonable. On information and belief, Collateral Intelligence has committed purposeful acts or transactions in the State of Texas such that it reasonably knew and expected that it could be brought into a Texas court as a consequence of such activity. Further, on information and belief, Collateral Intelligence has committed acts of infringement in the Eastern District of Texas.

6. Upon information and belief, venue is proper in the Court pursuant to 28 U.S.C. § 1391(b) and (c) and § 1400 as Collateral Intelligence is subject to personal jurisdiction in this district.

GENERAL ALLEGATIONS

7. Each of the foregoing paragraphs is incorporated by reference.

8. CoreLogic is one of the nation’s largest providers of advanced property and ownership information, analytics, and solutions. As a core component of its business, CoreLogic manufactures and sells Automated Valuation Models (“AVMs”) for real estate appraisal.

9. The AVM technology at issue allows persons to easily, accurately and instantly obtain an appraisal of the value of real property without having an on-sight appraiser.

10. CoreLogic is a leading innovator in AVM technology and is the assignee and owner of all rights, title, and interest in U.S. Patent No. 5,361,201 (the “’201 Patent”), entitled “Real Estate Appraisal Using Predictive Modeling.” The ’201 Patent was duly and legally

issued on November 1, 1994, by the United States Patent and Trademark Office. A copy of the '201 Patent is attached hereto as **Exhibit A**.

COUNT ONE

(COLLATERAL INTELLIGENCE'S INFRINGEMENT OF THE '201 PATENT)

11. Each of the foregoing paragraphs is incorporated by reference.

12. On information and belief, Collateral Intelligence manufactures, offers for sale, sells, uses or induces the same, systems falling within the scope of one or more of the claims of the '201 Patent, including, but not limited to, CaValue AVM, CaValue Range AVM, CaValue Interactive AVM, and Hybrid Valuation Report. As a result, Collateral Intelligence has infringed, literally and/or by equivalents, continues to infringe, and/or threatens infringement of one or more of the claims of the '201 Patent as defined by 35 U.S.C. § 271. Plaintiff has suffered damage by reason of Collateral Intelligence's infringement and will continue to suffer additional damage until this Court enjoins the infringing conduct. On information and belief, Collateral Intelligence is contributing to and/or inducing the infringement of one or more claims of the '201 Patent by offering to sell and selling its systems, including, but not limited to, CaValue AVM, CaValue Range AVM, CaValue Interactive AVM, and Hybrid Valuation Report, to customers, buyers, sellers, users and others that directly infringe the '201 Patent.

13. Plaintiff believes that Collateral Intelligence will continue to infringe the '201 Patent unless enjoined by this Court. Such infringing activity causes Plaintiff irreparable harm and will continue to cause such harm without the issuance of an injunction.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff CoreLogic Solutions, LLC hereby demands a trial by jury on this action.

PRAYER FOR RELIEF

WHEREFORE, CoreLogic respectfully requests that this Court enter judgment in its favor and against defendants and grant the following relief:

A. Judgment that one or more of the claims of the '201 Patent have been infringed, either directly, contributorily, and/or by inducement, either literally and/or under the doctrine of equivalents, by Collateral Intelligence;

B. Judgment awarding damages adequate to compensate CoreLogic for its profits lost, but not less than a reasonable royalty, for the infringement of the '201 Patent by Collateral Intelligence, including treble damages, costs, and all other categories of damages allowed by 35 U.S.C. § 284;

C. Permanent injunctive relief enjoining Collateral Intelligence, its employees, agents, affiliates and all other persons in active concert or participation with it as follows:

- (i) from using, manufacturing, offering to sell or selling any products falling within the scope of the claims of the '201 Patent;
- (ii) from actively inducing others to infringe any of the claims of the '201 Patent;
- (iii) from engaging in acts constituting contributory infringement of any of the claims of the '201 Patent;
- (iv) from all other acts of infringement of any of the claims of the '201 Patent;

D. Further such other and further relief as this Court deems just and proper under the circumstances.

Dated: May 23, 2012

Respectfully submitted by,

By: /s/ Eric H. Findlay
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