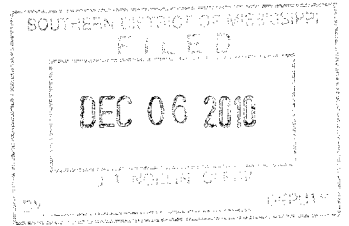


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI



SKYHAWKE TECHNOLOGIES, LLC,)
)
Plaintiff,)
)
v.)
)
DECA INTERNATIONAL CORP.,)
)
Defendant.)

C.A. No. 3:11-cv-00017-JWB

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff SkyHawke Technologies, LLC (“SkyHawke”), by its undersigned attorneys, brings this complaint for patent infringement against Defendant DECA International Corp. (“Defendant”) and, in support thereof, alleges as follows:

PARTIES

1. Plaintiff SkyHawke is a Mississippi Limited Liability Company having a principal place of business at Ridgeland Technology Center, 274 Commerce Park Drive, Suite M, Ridgeland, MS 39157.
2. Upon information and belief, Defendant DECA International Corp. (“DECA”) is a California corporation, having a principal place of business at 16613 Valley View Avenue, Cerritos, CA 90703.

BACKGROUND

3. SkyHawke owns by assignment all rights, title and interest in and to United States Patent No. 6,456,938 (the “’938 patent”) entitled “PERSONAL DGPS GOLF COURSE CARTOGRAPHER, NAVIGATOR AND INTERNET WEB SITE WITH MAP EXCHANGE AND TUTOR.” The ‘938 patent was duly and legally issued by the United States Patent and

Trademark Office on September 24, 2002. A true and correct copy of the '938 patent is attached hereto as Exhibit A.

JURISDICTION AND VENUE

4. This action arises under the federal patent laws, 35 U.S.C. §§ 101 *et seq.*
5. This Court has subject matter jurisdiction over this action based on 28 U.S.C. §§ 1331 and 1338(a).
6. This Court has personal jurisdiction over DECA because, on information and belief, DECA has made, caused to be made, imported, caused to be imported, used, caused to be used, offered to sell, sold, and caused to be sold products (including but not limited to, the GolfBuddy World Platinum Device) in the State of Mississippi, which have infringed, induced infringement and/or contributed to infringing the '938 patent.
7. Venue is proper under 28 U.S.C. §§ 1391(b) and (c) and 1400.

CLAIM FOR RELIEF
(For Infringement of United States Patent No. 6,456,938)

8. SkyHawke incorporates paragraphs 1-7 by reference as if set forth here in full.
9. On information and belief, Defendant has been and is now making, using, selling, or offering for sale, within the United States, GPS devices for use on golf courses which infringe one or more claims of the '938 patent.
10. On information and belief, Defendant has infringed, and continue to infringe, either literally or under the doctrine of equivalents, one or more claims of the '938 patent by making, using, selling, or offering for sale, within the United States, GPS devices for use on golf courses.

11. SkyHawke has been damaged by such infringement and will continue to be damaged by such infringement unless Defendant is permanently enjoined from its unlawful infringement of the '938 patent by this Court.

PRAYER FOR RELIEF

WHEREFORE, SkyHawke respectfully requests:


- (1) an injunction against continued infringement (35 U.S.C. § 283);
- (2) an award of damages adequate to compensate SkyHawke for Defendant's infringement of the '938 patent, together with interest and costs as fixed by the Court (35 U.S.C. § 284);
- (3) its costs (Fed. R. Civ. P. 54(d)); and
- (4) any other relief appropriate under the circumstances.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff SkyHawke, Inc. hereby demands a trial by jury of all issues so triable in this action.

This the 6th day of December, 2010.

RESPECTFULLY SUBMITTED,



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