

July 16, 2008

Kevin M. Bell
(703) 744-8065
Kbell@pattonboggs.com

Practice Limited To Matters
Before Federal Courts

VIA FEDEX

Geert Bevin
Chief Technical Officer
Uwyn Bvba/Sprl
Avenue de Scailmont 34
B-7170 Manage
Belgium

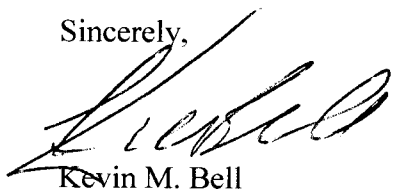
Re: *Channel Intelligence, Inc. v. SBSH Mobile Software Ltd. et al.*
United States District Court for the District of Delaware
Civil Action No. 08-437

Dear Mr. Bevin:

Our firm has been retained as intellectual property counsel by Channel Intelligence, Inc. regarding U.S. Patent No. 6,917,941. Attached is a courtesy copy of a complaint filed by Channel Intelligence against your company in the U.S. District Court for the District of Delaware. Please provide the complaint to your counsel.

Please let us know if you are interested in discussing ways to resolve this matter amicably. If your company does have an interest, we would like to receive a response as soon as possible, but not later than August 4, 2008. We look forward to receiving your response.

Sincerely,



Kevin M. Bell

Enclosure

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FILED
CLERK, U.S. DISTRICT COURT
DISTRICT OF DELAWARE

2008 JUL 15 PM 4:34

CHANNEL INTELLIGENCE, INC.,)
)
Plaintiff,)
)
v.)
)
SBSH MOBILE SOFTWARE LTD., and)
UWYN BVBA/SPRL,)
)
Defendants.)

C. A. No. 08 - 437

COMPLAINT

Plaintiff, Channel Intelligence, Inc. ("Channel Intelligence"), for its complaint against defendants alleges as follows:

PARTIES

1. Channel Intelligence is a Delaware corporation with its principal place of business in Celebration, Florida.
2. Defendant SBSH Mobile Software Ltd. ("SBSH") is an Israeli corporation with its principal place of business in Rishon Le Zion, Israel. SBSH owns, maintains and/or operates a website at <http://www.sbsh.net>, the content of which is incorporated herein by reference. Its products and services are offered to and may be purchased and/or used by citizens of Delaware.
3. Defendant Uwyn Bvba/Spri ("Uwyn") is a Belgium corporation with its principal place of business in Manage, Belgium. Uwyn owns, maintains and/or operates a website at <http://www.blablalist.com>, the content of which is incorporated herein by reference. Its products and services are offered to and may be purchased and/or used by citizens of Delaware.

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under Title 35 of the United States Code, 35 U.S.C. §§ 1 *et seq.*

5. Exclusive subject matter jurisdiction over this matter is conferred upon the Court pursuant to 28 U.S.C. §§ 1331 and 1338.

6. The exercise of personal jurisdiction over each defendant comports with the laws of the State of Delaware and the constitutional requirements of due process because the defendants are incorporated in Delaware and/or transacts business and/or offers to transact business within Delaware.

7. Venue is proper in this District under 28 U.S.C. §§ 1391, 1400(b).

FACTS

8. Channel Intelligence was incorporated in 1991. Its primary goal is to help online consumers easily find and buy products. Channel Intelligence's products, methods and systems include, *inter alia*, a software system that allows online shoppers to create personal lists of goods and/or services (*e.g.*, a shopping list, or other type of list) managed via a web browser and stored on a networked server for later access, revision, printing, and so on.

9. Channel Intelligence owns the entire right, title and interest to U.S. Patent No.6,917,941 ("the '941 patent"), issued to Wight, *et al.*, on or about July 12, 2005, entitled "Method and Apparatus for Creation and Maintenance of Database Structure." A copy of the '941 patent is attached as Ex. 1 and incorporated by reference. Channel Intelligence also owns foreign equivalents to that patent.

10. Channel Intelligence marks its website, product literature and online accessible software system embodying the '941 patent's invention with the '941 patent and its foreign equivalents.

11. Each defendant makes, offers for sale, sells, and uses products, methods, and services that fall within the scope of one or more claims of the '941 patent. In addition, each defendant contributes to and induces others to use each defendant's respective infringing products, methods, and services.

12. None of the defendants are licensed or authorized to use any of Channel Intelligence's intellectual property.

COUNT I
(Patent Infringement -- SBSH)

13. The foregoing allegations of this complaint are incorporated by reference.

14. SBSH has made, used, sold, and/or offered for sale products embodying the patented invention, thereby infringing, literally or under the doctrine of equivalents, one or more claims of the '941 patent, and will continue to do so unless enjoined therefrom.

15. SBSH has contributed to the use by others of its infringing products, methods, and services.

16. SBSH has induced the use by others of its infringing products, methods, and services.

17. SBSH's infringement has been willful.

18. Channel Intelligence has been irreparably harmed by SBSH's acts of infringement and has suffered damages in an amount to be determined at trial.

COUNT II
(Patent Infringement -- Uwyn)

19. The foregoing allegations of this complaint are incorporated by reference.
20. Uwyn has made, used, sold, and/or offered for sale products embodying the patented invention, thereby infringing, literally or under the doctrine of equivalents, one or more claims of the '941 patent, and will continue to do so unless enjoined therefrom.
21. Uwyn has contributed to the use by others of its infringing products, methods, and services.
22. Uwyn has induced the use by others of its infringing products, methods, and services.
23. Uwyn's infringement has been willful.
24. Channel Intelligence has been irreparably harmed by Uwyn's acts of infringement and has suffered damages in an amount to be determined at trial.

REQUEST FOR RELIEF

Channel Intelligence respectfully requests that this Court enter judgment against the defendants and that the following relief be granted:

- a. judgment that the defendants have infringed the claims of the '941 patent (35 U.S.C. § 271);
- b. judgment that defendants' infringement of the claims of the '941 patent was willful;
- c. injunction against continued infringement (35 U.S.C. § 283);
- d. damages for past infringement (35 U.S.C. § 284);
- e. imposition of a constructive trust on all proceeds from the sale of accused products;

- f. increased and trebled damages for willful infringement (35 U.S.C. § 284);
- g. attorneys' fees as allowed by law, including without limitation, 35 U.S.C. § 285;
- h. costs pursuant to Fed. R. Civ. P. 54(d) or otherwise provided by law; and
- i. such other relief as the Court deems just and appropriate under the circumstances.

JURY DEMAND

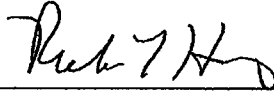
Channel Intelligence hereby demands a jury trial on all issues so triable.

Respectfully submitted,

OF COUNSEL:

POTTER ANDERSON & CORROON LLP

James K. Lewis
PATTON BOGGS LLP
1801 California Street, Suite 4900
Denver, Colorado 80202
(303)-830-1776

By: 
Richard L. Horwitz (#2246)
David E. Moore (#3983)
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899-0951
(302) 984-6000
rhorwitz@potteranderson.com
dmoore@potteranderson.com

Richard J. Oparil
PATTON BOGGS LLP
2550 M Street, NW
Washington, DC 20037
(202) 457-6000

Kevin M. Bell
PATTON BOGGS, LLP
8484 Westpark Drive, Ninth Floor
McLean, Virginia 22102
(703) 744-8000

*Attorneys for Plaintiff
Channel Intelligence, Inc.*

Dated: July 15, 2008
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