

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

**Industrial Quick Search, Inc.,
a Michigan corporation, and
Michael Meiresonne, an Individual**

Plaintiffs,

v.

Google, Inc., a Delaware corporation,

Defendant.

Case No. _____

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT
AND DEMAND FOR JURY TRIAL**

Plaintiffs Industrial Quick Search, Inc. (“IQS”) and Michael Meiresonne (“Meiresonne”), by and through their counsel, for their Complaint against Google, Inc. (“Google”) allege as follows:

The Parties

1. IQS is a Michigan corporation having its principal place of business at 1500 East Beltline Ave., Suite 265, Grand Rapids, MI 49506.
2. Meiresonne owns IQS and resides at 2096 Robinson Road, East Grand Rapids, MI 49506.
3. On information and belief, defendant Google is a Delaware corporation having its principal place of business at 1600 Amphitheatre Parkway, Mountain View, CA 94043.

Jurisdiction And Venue

4. The claims pleaded herein arise under the Patent Act, 35 U.S.C. § 1 et seq.
5. Subject matter jurisdiction for the pleaded claims is conferred upon the Court by 28 U.S.C. §§ 1331 and 1338.
6. IQS, the exclusive licensee of the asserted patent, resides and is registered to do business in this District (MI Bus. I.D. No. 23571C).
7. Meiresonne, the inventor of the asserted patent and the sole owner of IQS, also resides in this District.
8. Google regularly and continuously engages in substantial sales and other business transactions in this District. Google is registered to do business in this District (MI Bus. I.D. No. 650221). Google's Registered Agent Office address in this District is 601 Abbot Rd., East Lansing, MI 48823.
9. Google has committed acts of patent infringement and has established minimum contacts in this District.
10. On information and belief, Google receives millions of dollars of search advertising revenue from this District.
11. For at least these reasons, venue is proper in this District pursuant to 28 U.S.C. § 1391 and/or 28 U.S.C. § 1400.

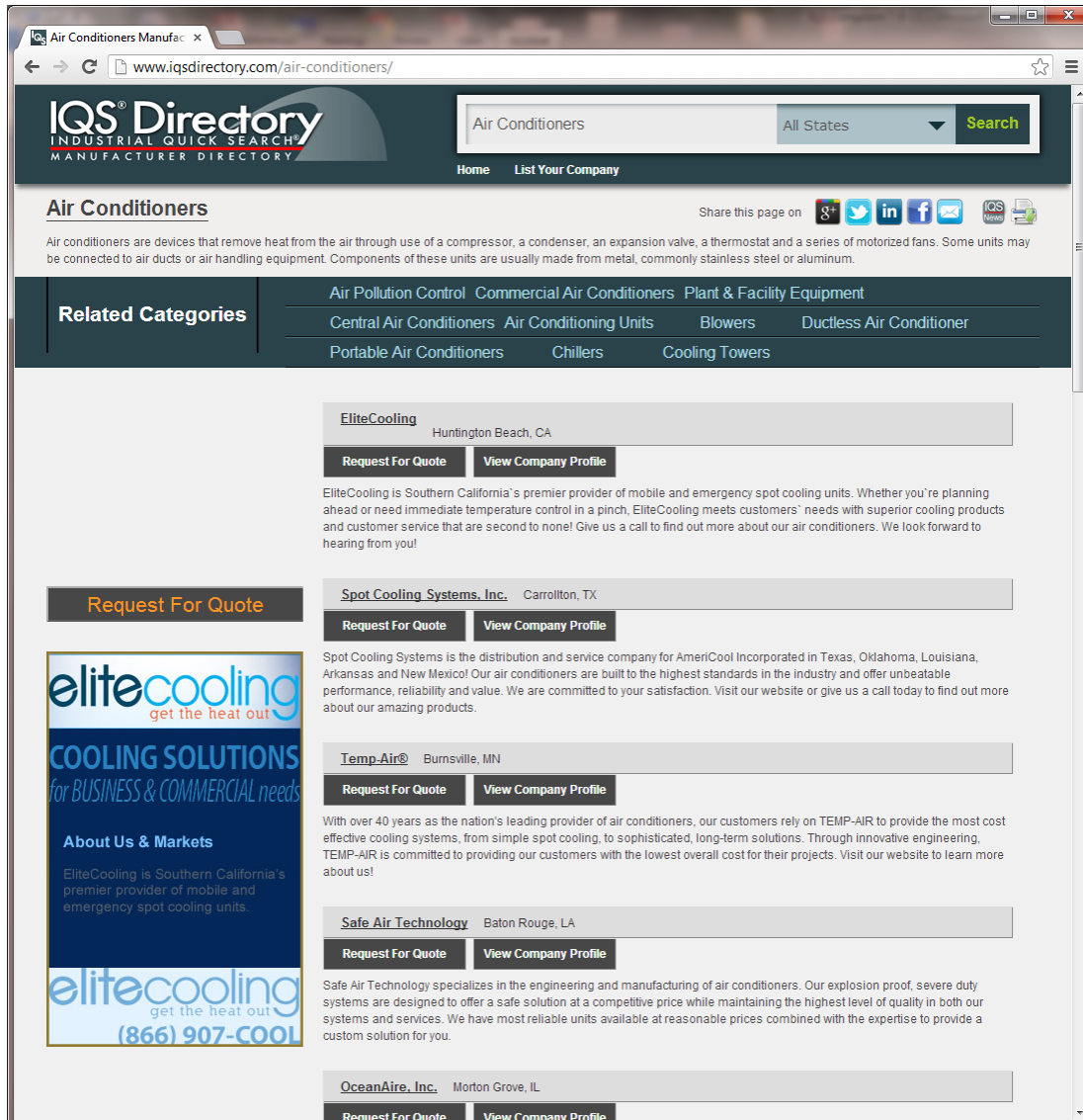
Meiresonne, IQS And The Patented Technology

12. Meiresonne entered the industrial search listing business in 1975 by working with MacRAE'S Blue Book. In 1981, Meiresonne joined Thomas Register, where he became a senior sales contractor and was awarded one of the company's top ten sales franchises.

13. The patented technology relates to the display of “rollover” or “preview” windows alongside Internet search result listings. Meiresonne invented the patented technology as an improvement over traditional text-only Internet search listings.

14. IQS has practiced its patented technology since 2000, providing an online directory search tool having a rollover window feature. The IQS directory features many industrial manufacturers, service providers, suppliers and distributors who pay IQS to be listed.

15. An example of the patented IQS search tool can be seen at <http://www.iqsdirectory.com/air-conditioners/>, reproduced below.



16. By using a mouse to “roll over” the names of the air conditioner suppliers listed above, an informational window or advertisement associated with each supplier is automatically displayed to the left of the text listings.

17. IQS derives its revenue from the suppliers of goods or services that pay IQS to list and thereby advertise their goods in the IQS online directory of products and services. The IQS directory has experienced more than 17,000,000 page views.

18. U.S. Patent No. 8,156,096 (the “’096 Patent,” Exhibit A) is entitled “Supplier Identification and Locator System and Method.” The ‘096 Patent issued April 10, 2012 and, through intermediate applications, claims priority to U.S. Patent Application Serial No. 09/938,163 filed August 23, 2001.

19. Figure 2 of the ‘096 Patent depicts one embodiment of the patented technology:

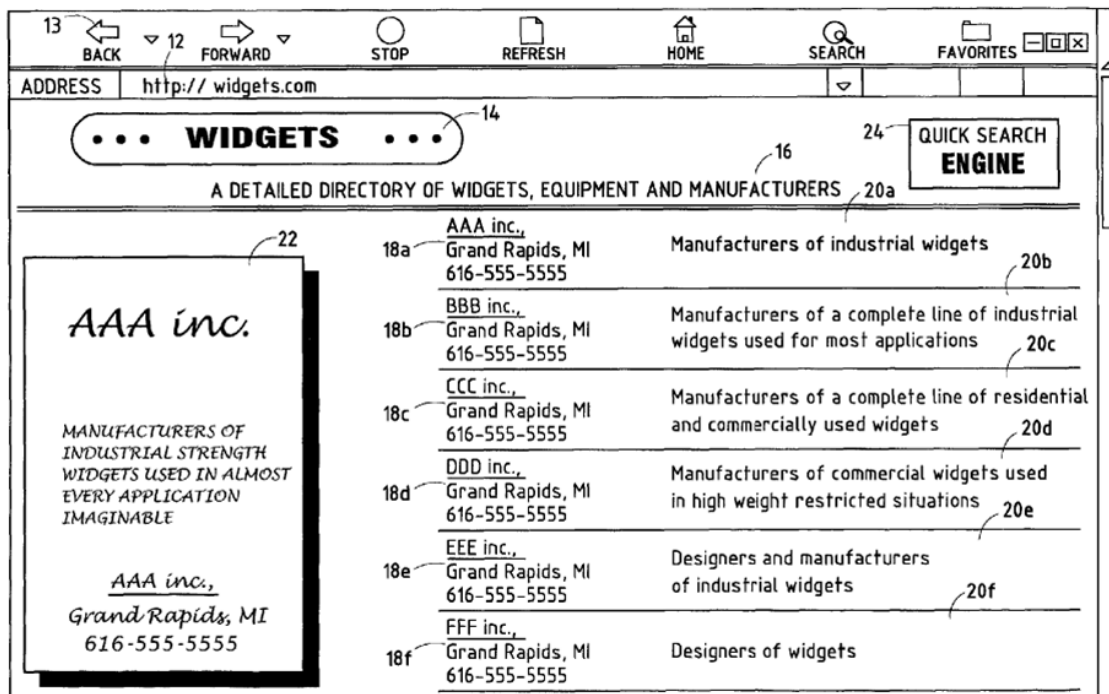


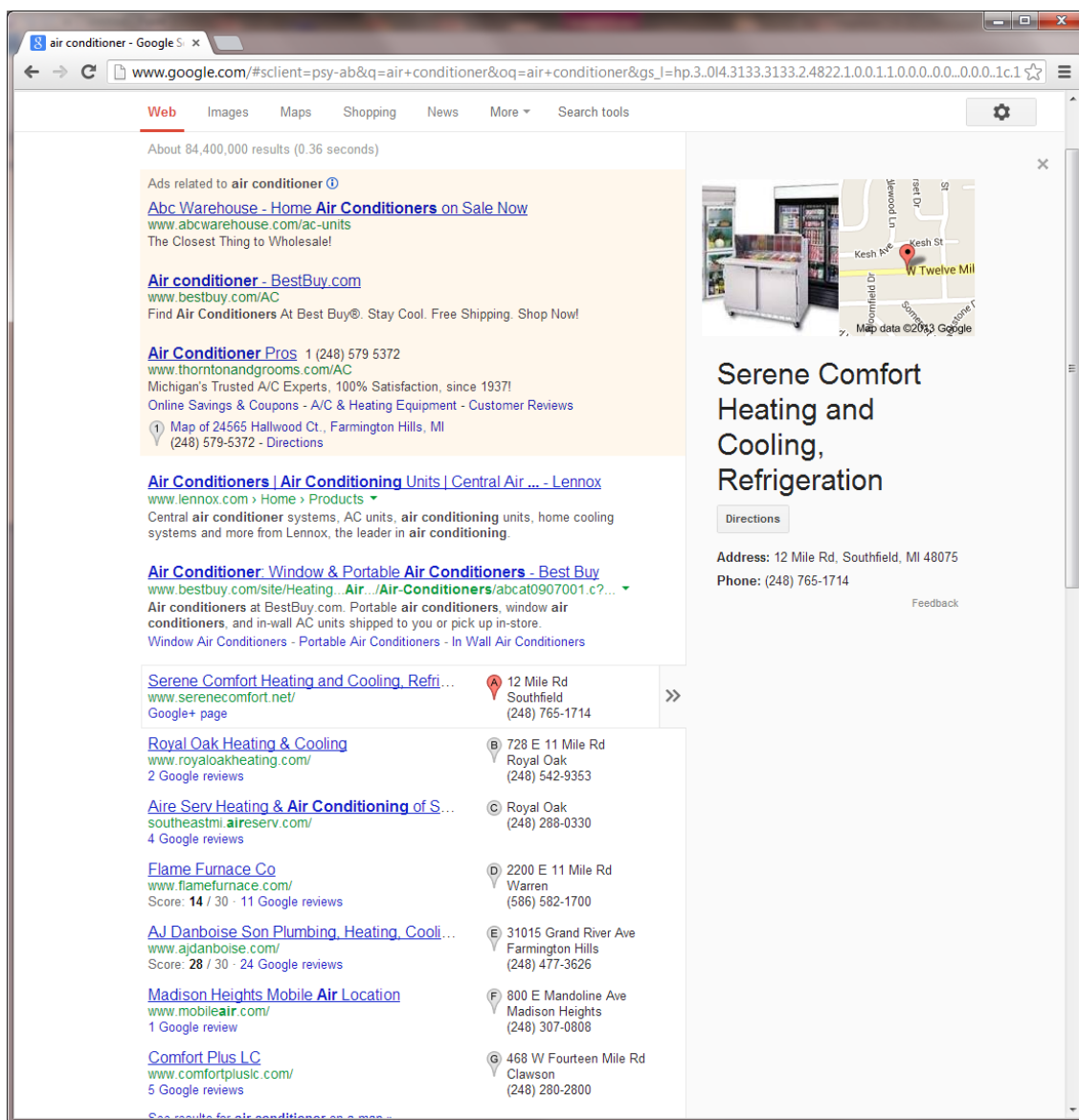
FIG. 2

20. Meiresonne is the inventor and sole owner of the ‘096 Patent. IQS is the exclusive licensee of the ‘096 patent, and has the right to enforce the ‘096 patent in this case.

21. The IQS search tool is marked with the '096 Patent number pursuant to 35 U.S.C. § 287.

Google's Infringement Of The '096 Patent

22. Google infringes the '096 patent by providing a rollover window to the right of search engine results for various goods and services. For example, a search of "air conditioners" at Google produces the following search result.



23. Just as described in the '096 patent, Google provides a rollover window alongside local search results that provides additional information about particular local listings, such as the address and telephone number of the company that provides the good or service, as well as graphics corresponding to the search results listing.

24. Placing a mouse over the hyperlink, associated address, or the double arrow ">>" corresponding to the local listings (*e.g.*, "Serene Comfort Heating and Cooling") produces the rollover window along the right-hand side of the listings. The rollover window provides, for each of the local listings, the address, telephone number, a map of their location and, in some cases, one or more images associated with the listing.

25. Google introduced the infringing "instant preview" technology in approximately November 2010 to enhance its search engine, increase traffic, and ultimately generate revenue. For example, Google's 2010 10K Report filed with the Securities and Exchange Commission ("SEC") states that "Instant Previews" are among "some recent notable enhancements to search." Google's 2011 10K and Google's 2012 1Q 10K, each also filed with the SEC, state that "providing an option to preview the ad" was among the "improvements in [Google's] ability to ultimately monetize increased traffic."

26. Google has infringed, and continues to infringe, one or more claims of the '096 Patent by making, using and/or selling the rollover feature described above, and by inducing users of Google's use that feature.

27. Meiresonne and IQS have suffered damages as a result of the infringing activities of Google, and will continue to suffer such damages as long as Google's infringing activities continue.

Prayer For Relief

WHEREFORE, IQS and Meiresonne request entry of a judgment against Google, granting relief as follows:

- A. Finding Google liable for infringement of the '096 patent;
- B. Entering an Order preliminarily and permanently enjoining Google, together with any officers, agents, servants, employees, and attorneys, and such other persons in active concert or participation with Google who receive actual notice of the Order, from further infringement of the '096 patent;
- C. Awarding Plaintiffs damages adequate to compensate for Google's infringement;
- D. Declaring this an exceptional case within the meaning of 35 U.S.C. § 285, and awarding Plaintiffs treble damages and their reasonable attorney's fees, costs, and disbursements;
- E. Awarding Plaintiffs interest on all damages awarded; and
- F. Granting such other, further and different relief as may be just and equitable on the proofs.

Demand For Jury Trial

Plaintiffs hereby demand a trial by jury for all issues so triable.

Respectfully submitted,

BROOKS KUSHMAN P.C.

Dated: July 17, 2013

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