



### **Jurisdiction & Venue**

3. This action arises under the patent statutes of the United States, 35 U.S.C. § 271 et seq. Accordingly, the Court has federal question jurisdiction over this matter under 28 U.S.C. §§ 1331 and 1338(a).

4. The court has specific and general jurisdiction over Maersk Contractors.

5. Venue is properly within this district in accordance with 28 U.S.C. § 1391 (b) and (c) and § 1400 (b).

### **Facts and Background**

#### **The Transocean Patents**

6. On April 11, 2000, United States Patent No. 6,047,781 (the “‘781 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘781 Patent is attached as Exhibit A and incorporated herein.

7. On May 2, 2000, United States Patent No. 6,056,071 (the “‘071 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘071 Patent is attached as Exhibit B and incorporated herein.

8. On May 30, 2000, United States Patent No. 6,068,069 (the “‘069 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘069 Patent is attached as Exhibit C and incorporated herein.

9. On July 11, 2000, United States Patent No. 6,085,851 (the “‘851 Patent”) was duly and legally issued for an invention in a Multi-Activity Offshore Exploration and/or

Development Drill Method and Apparatus. A copy of the '851 Patent is attached as Exhibit D and incorporated herein.

10. Collectively, the above-mentioned patents are the Transocean patents. Transocean owns the Transocean patents by assignment dated March 9, 2004.

### **Maersk Contractors Infringes the Transocean Patents**

11. By May 2005, Maersk Contractors contracted to build a DSS-21 ultra deepwater development semisubmersible drilling rig in Singapore referred to by Maersk Contractors as the Deepwater Semisubmersible I. On information and belief, the design of the rig is covered by apparatus claims of the Transocean patents.

12. Maersk Contractors negotiated and contracted with Statoil Gulf of Mexico LLC by December 18, 2006 to provide the Deepwater Semisubmersible I for four years of drilling operations primarily in the Gulf of Mexico for an estimated \$696 million.

13. Maersk Contractors reports that it will bring the Deepwater Semisubmersible I to the Gulf of Mexico for operations by the summer of 2008.

14. Transocean notified Maersk Contractors of its infringing activities by letter dated August 17, 2005.

### **Count 1: Patent Infringement**

15. Transocean adopts and incorporates by reference the allegations set forth in the paragraphs 1-14.

16. On information and belief, defendant Maersk Contractors infringes the claims in the Transocean patents by offering for sale and selling the Deepwater Semisubmersible I for use in the Gulf of Mexico.

17. Maersk Contractors will continue to infringe the claims in the Transocean patents unless enjoined by this Court.

18. Transocean has been damaged and will continue to be damaged by Maersk Contractors' infringing acts.

19. On information and belief, Maersk Contractors was actually aware of the Transocean patents and willfully committed acts of infringement.

**Jury Demand**

20. Transocean demands a trial by jury.

**Prayer for Relief**

WHEREFORE, Transocean prays the Court to:

- (a) grant a permanent injunction against Maersk Contractors' continued infringement;
- (b) award damages of not less than a reasonable royalty;
- (c) find that Maersk's infringement has been willful and under 35 U.S.C. § 284 and increase such damages to three times the awarded amount;
- (d) award prejudgment and postjudgment interest;
- (e) find that this case is an exceptional case under 35 U.S.C. § 285 and award attorneys' fees;
- (f) award costs; and
- (g) grant all other relief to which Transocean is entitled.

Date: July 24, 2007

Respectfully submitted,

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