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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 UNILOC 2017 LLC, 11 Plaintiff, 12 v. 13 INFOR, INC., 14 Defendant.	Civil Action No. 8:19-cv-01150 COMPLAINT FOR PATENT INFRINGEMENT JURY TRIAL DEMANDED
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15 Plaintiff, Uniloc 2017 LLC (“Uniloc”), for its complaint against defendant, Infor, Inc.
16 (“Infor”), alleges:

17 **THE PARTIES**

- 18 1. Uniloc is a Delaware limited liability company.
- 19 2. Infor is a Delaware corporation having a regular and established place of business at
20 26250 Enterprise Court in Lake Forest, California, 92630.

21 **JURISDICTION**

- 22 3. Uniloc brings this action for patent infringement under the patent laws of the United
23 States, 35 U.S.C. § 271, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331
24 and 1338(a).

25 **COUNT I**

26 (INFRINGEMENT OF U.S. PATENT NO. 6,324,578)

- 27 4. Uniloc incorporates paragraphs 1-3 above by reference.

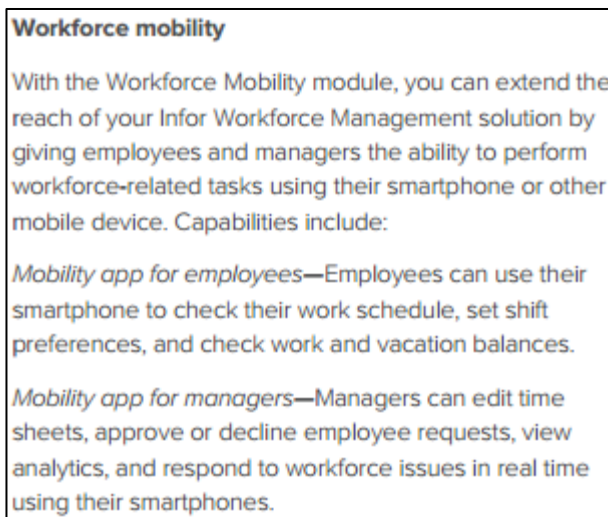
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1 5. Uniloc is the owner, by assignment, of U.S. Patent No. 6,324,578 (“the ’578
2 Patent”), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR
3 MANAGEMENT OF CONFIGURABLE APPLICATION PROGRAMS ON A NETWORK,
4 which issued on November 27, 2001 on an application filed on December 14, 1998. A copy of the
5 ’578 Patent is attached as Exhibit A.

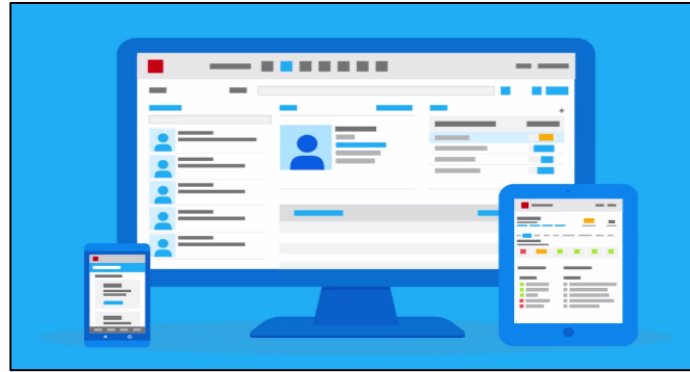
6 6. The following image from www.infor.com shows that Infor provides numerous
7 solutions over the Internet:

CI	Clinical Interoperability	▼	ERP	Enterprise Resource Planning	▼
CX	Customer Experience (CRM and Marketing solutions)	▼	HCM	Human Capital Management	▼
d/EPM	Enterprise Performance Management	▼	PLM	Product Lifecycle Management	▼
EAM	Enterprise Asset Management	▼	SCM	Supply Chain Management	▼
EFM	Enterprise Financial Management	▼			

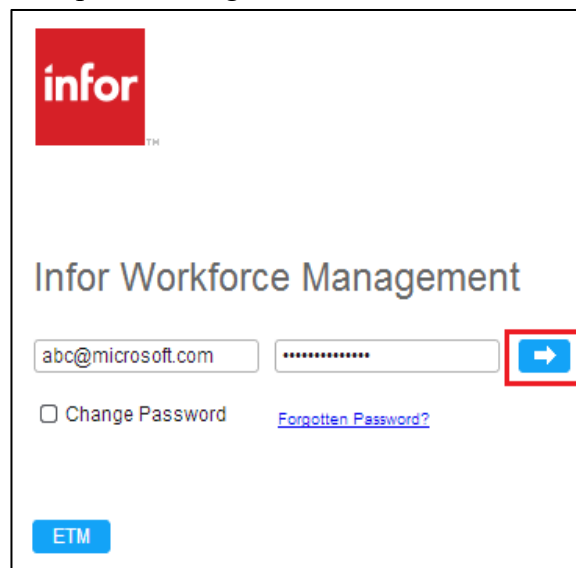
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13 7. The following image from www.infor.com shows that Infor also provides solutions
14 for use on smartphones, such as Workforce mobility:



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23 8. The following image from www.infor.com shows that Infor provides solutions for
24 use on desktop computers, smartphones and tablet devices:



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7 9. The following Infor image shows that one solution provided by Infor and installed
8 on a user's device is Infor Workplace Management:



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18 10. The following image from www.infor.com shows that Infor provides solutions,
19 such as Workforce Scheduling, that offer users configurable preferences:

20 Infor's Workforce Scheduling module provides organizations with a number of features that will
21 enable them to provide greater levels of flexibility and involvement through a comprehensive
22 employee self-service framework. Using an intuitive web or mobile-based interface, employees
23 can define their own work preferences such as when they are available for work, their preferred
24 shift times, preferred days (for part-time employees for example) or even the type of work which is
25 preferred. All of these preferences for each individual employee are automatically included and
26 considered in the schedule creation and optimization process. Using the same self-service
27 interface, employees can also submit requests for time-off and which are automatically routed to
28 the appropriate manager for authorization (subject to compliance and business rules been met
29 such as for accrual balances and entitlement for example). If and when approved, the scheduling
30 process then automatically compensates for those planned time-off requests. If required, self-
31 scheduling can also be provided, enabling employees (or certain groups or types of employees) to
32 manually input their own work schedules directly within a set of defined parameters.

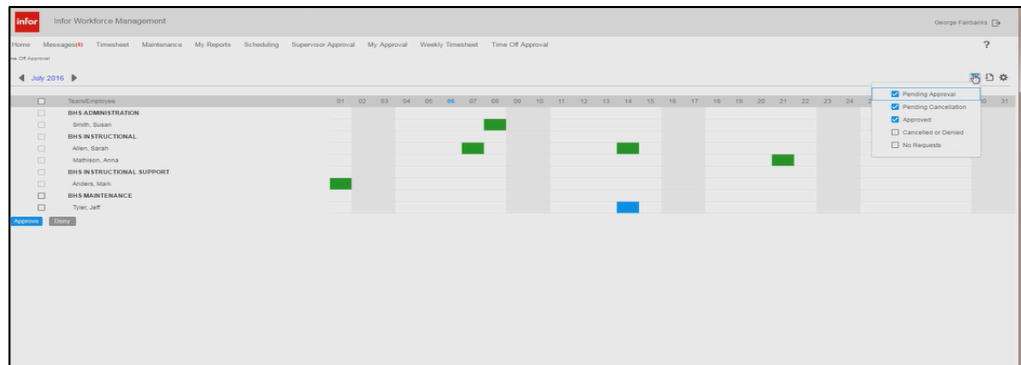
1 11. The following image from www.infor.com shows that Infor provides solutions,
 2 such as Workforce Management, that offer administrators configurable preferences:

3 integral and fully configurable rules engine, Infor's Time and Attendance module enables
 4 organizations to define any number of business, work or compliance rules which can be enforced,
 5 or validated, as data is entered into the system. Examples may include restricting an employee's
 6 ability to clock on outside of scheduled work times or allow employees to register activities against
 7 only certain work orders or projects, for example. Certain rules may require mandatory

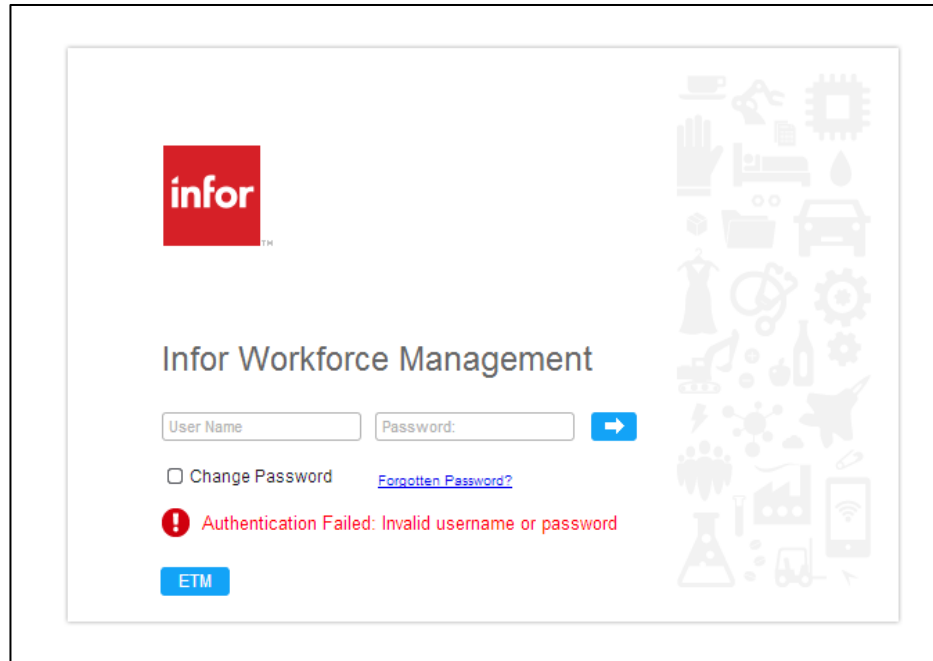
8 12. The following image from www.infor.com also shows that Infor provides solutions,
 9 such as Workforce Management, that offer administrators configurable preferences:

10 related data. The design methodology employed by Infor is heavily focused around improving the
 11 efficiency of many common workforce management processes and therefore alleviating managers
 12 of much of the administrative burden which would otherwise be required. Utilizing a push-based
 13 methodology for example, ensures that all actions or information that require a particular managers
 14 attention are automatically displayed (in real-time) in a message queue and which with each item
 15 categorized by type and level of importance. By selecting each notification, a split-pane view
 16 display's all the necessary supporting information the manager may need, with convenient links to
 17 the actions which are likely to be required. Examples may include: a notification when approval of
 18 an employee's time sheet is required; missing or inaccurate clock punch data; notification of an
 19 unapproved time or absence event such as a failure of an employee to clock on for a scheduled
 20 shift, a late arrival, an early finish or an unapproved extended break; or potential or actual
 21 compliance breaches triggered by the rules engine. By selecting a particular notification, the
 22 relevant information is displayed below (including the ability to make direct edits to information
 23 directly through the data view) with links to common actions such as approving or rejecting
 24 requests or making manual corrections as required. On approval, the automatic time-to-pay
 25 process continues with the data being submitted directly through to the payroll process. If the
 26 rejected, the manager or supervisor can add comments as to why the time sheet or request has
 27 been rejected which is then automatically routed back to the employee (through the Employee
 28 Transaction Manager) for correction.

13 13. The following image from Workforce Management also shows that Infor provides
 14 solutions, such as Workforce Management, that offer administrators configurable preferences:



15 14. The following image shows how an unauthorized user is denied access to the
 16 Workforce Management product:



12 15. Infor has infringed at least claim 1 of the '578 Patent by making, using, offering for
13 sale, and/or selling its software licensing and management system which software and associated
14 backend server architecture allow for installing application programs such as Workforce
15 Management, having configurable preferences and authorized users on a server coupled to a
16 network, distributing an application launcher program to a client, obtaining a user set of the
17 configurable preferences, obtaining an administrator set of configurable preferences, and executing
18 the application program using the user and administrator sets of configurable preferences
19 responsive to a request from a user.

20 16. Infor has also infringed the '578 Patent by actively inducing the use of the Infor
21 software licensing and management system. Infor's customers who used the Infor software
22 licensing and management system in accordance with Infor's instructions infringed the '578
23 Patent, as described above. Infor intentionally instructed its customers to infringe through
24 instructions on using the Workforce Management software and Infor system, such as exemplified
25 in the figures above.

26 17. Infor has also infringed the '578 Patent by contributing to the infringement by
27 others, including customers using the Infor software licensing and management system, by offering
28 to sell, selling, or otherwise commercially offering use of the system, which was used to infringe

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