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6 Attorneys for Plaintiff

7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA

<p>9 UNILOC 2017 LLC, 10 11 Plaintiff, 12 v. 13 NETSUITE, INC., 14 Defendant.</p>	<p>Civil Action No. 8:19-cv-01151 COMPLAINT FOR PATENT INFRINGEMENT JURY TRIAL DEMANDED</p>
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15 Plaintiff, Uniloc 2017 LLC (“Uniloc”), for its complaint against defendant, Netsuite, Inc.
16 (“Netsuite”), alleges:

17 **THE PARTIES**

- 18 1. Uniloc is a Delaware limited liability company.
- 19 2. Netsuite is a California corporation having a regular and established place of
20 business at 1620 26th Street, Santa Monica, California 90404.

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 pursuant to 28 U.S.C. §§
24 1331 and 1338(a).

25 **COUNT I**

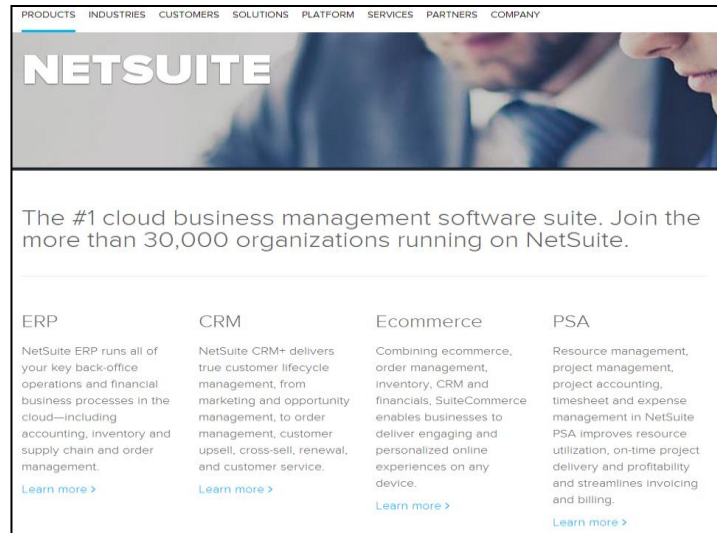
26 (INFRINGEMENT OF U.S. PATENT NO. 6,324,578)

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

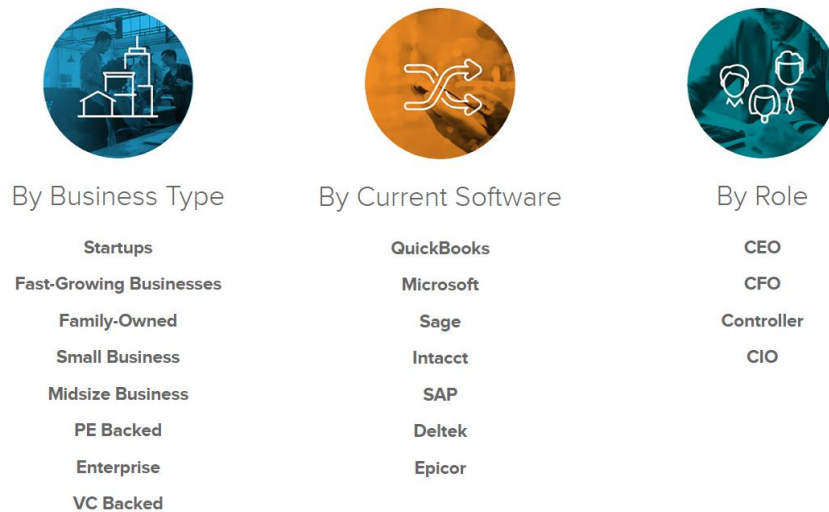
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1 5. Uniloc is the owner, by assignment, of U.S. Patent No. 6,324,578 (“the ’578
 2 Patent”), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR
 3 MANAGEMENT OF CONFIGURABLE APPLICATION PROGRAMS ON A NETWORK,
 4 which issued on November 27, 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.Netsuite.com shows that the Netsuite cloud
 7 software suite is used to distribute software products, including ERP, CRM, Ecommerce, and PSA:



16 7. The following image from www.Netsuite.com shows that the Netsuite cloud
 17 software suite is used to distribute of applications:



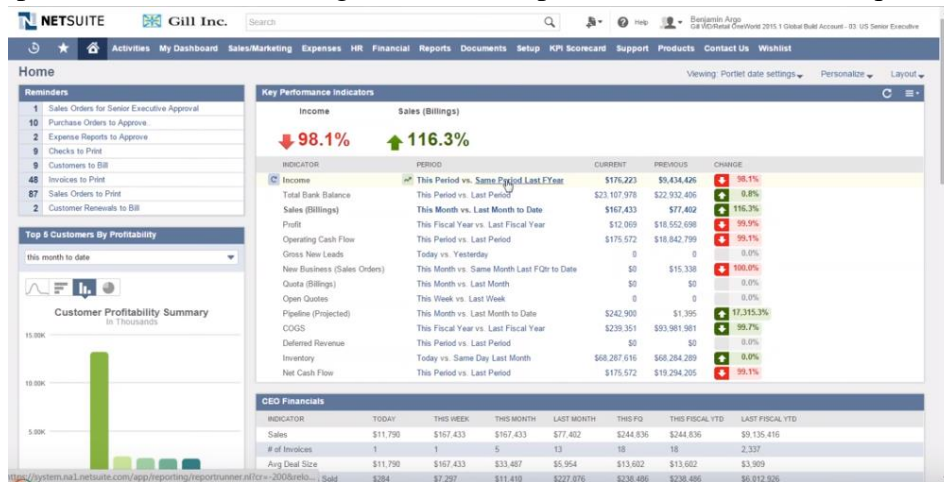
27 8. The following image from www.Netsuite.com shows how an authorized user logs
 28 in to Netsuite’s platform:



9. The following image from a Netsuite product demo shows that the Netsuite platform is used to distribute numerous configurable apps to authorized users:

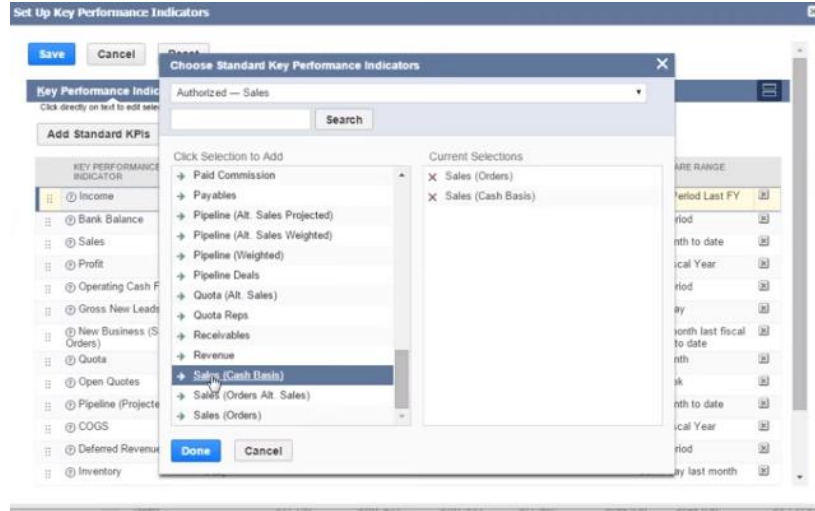


10. The following image from a Netsuite product demo shows a configurable dashboard of a Netsuite product distributed through the Netsuite platform to the user's computer:

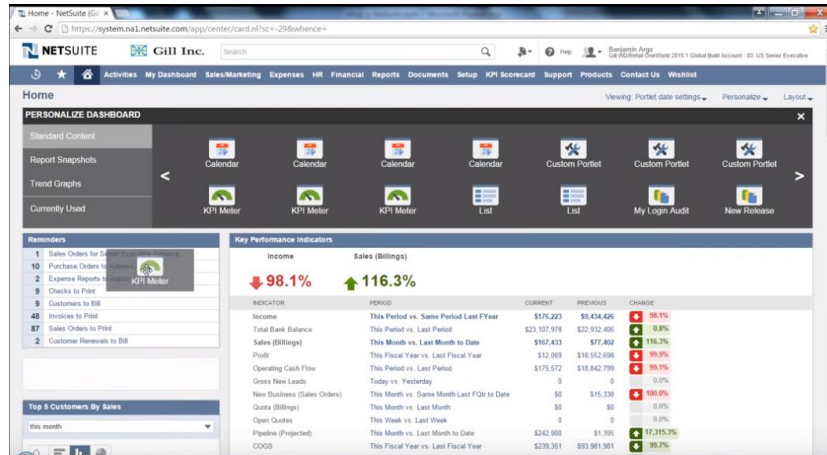


11. The following image from a Netsuite product demo shows how a user configures a dashboard of a Netsuite product distributed through the Netsuite platform:

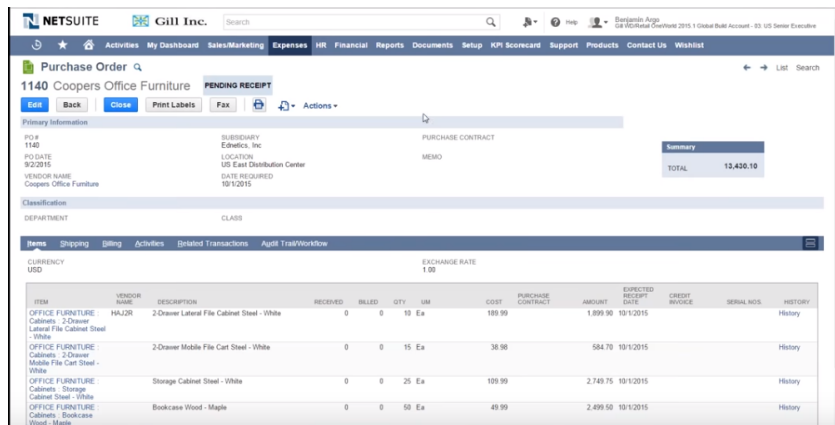
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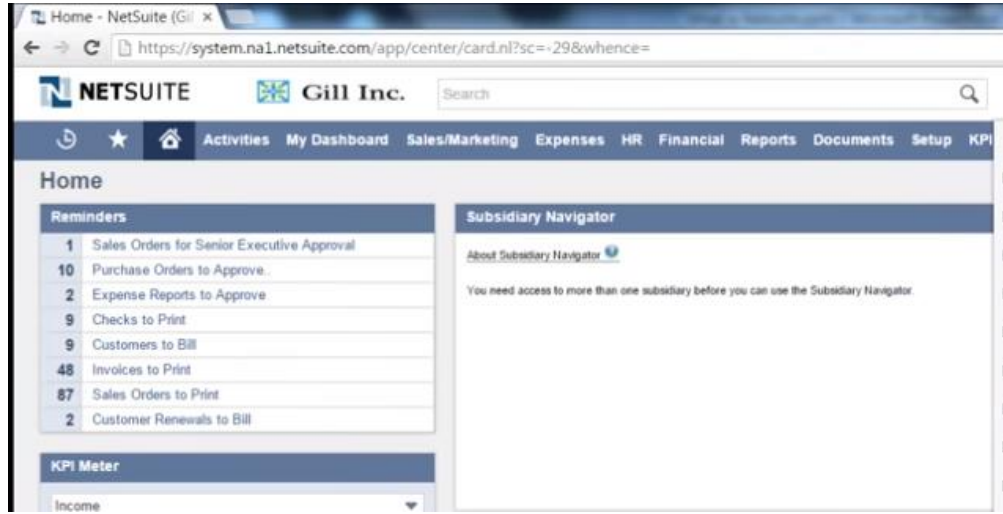
12. The following image from a Netsuite product demo shows how a user can configure the dashboard by dragging and dropping gadgets to the desired location:



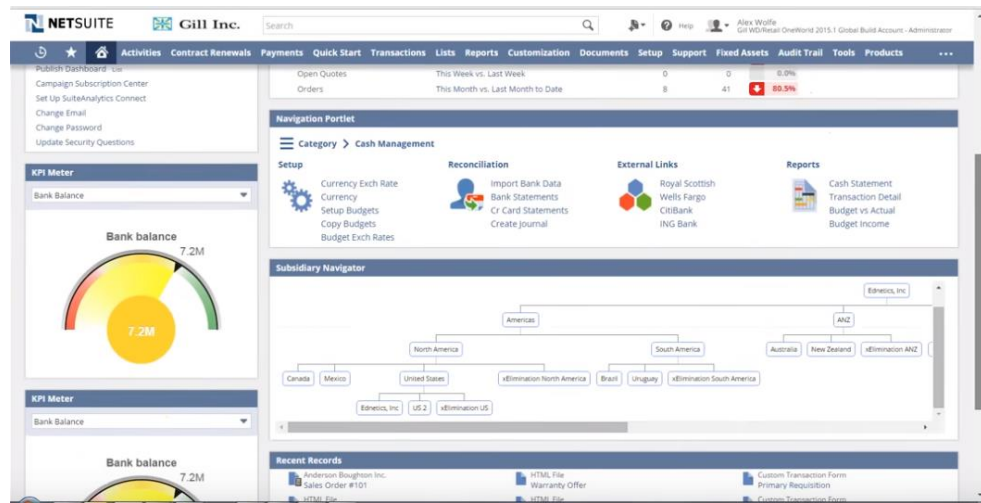
13. The following image from a Netsuite product demo shows how an administrator has not granted rights to this user to approve a Purchase Order and the platform will prevent the user from approving the transaction:



1 14. The following image from a Netsuite product demo shows that the user has been
2 prevented by the administrator from using the Subsidiary Navigator feature:



11 15. The following image from a Netsuite product demo shows that the user has been
12 granted permission by the administrator to use the Subsidiary Navigator feature:



21 16. The following image from a Netsuite product demo shows that the administrator
22 can set rules for the degree of access to information based upon the user's position in the company:
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