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Ancora Technologies, Inc.

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13

14 ANCORA TECHNOLOGIES,
15 INC.

16 Plaintiffs,

17 v.

18 TCL CORP., SHENZHEN TCL
CREATIVE CLOUD
19 TECHNOLOGY CO., LTD.,
HUIZHOU TCL MOBILE
20 COMMUNICATION CO,
LTD., and TCT MOBILE (US)
INC.

21 Defendants.
22

Case No. 8:19-cv-02192-JLS-ADS

[Hon. Josephine L. Staton]

AMENDED COMPLAINT

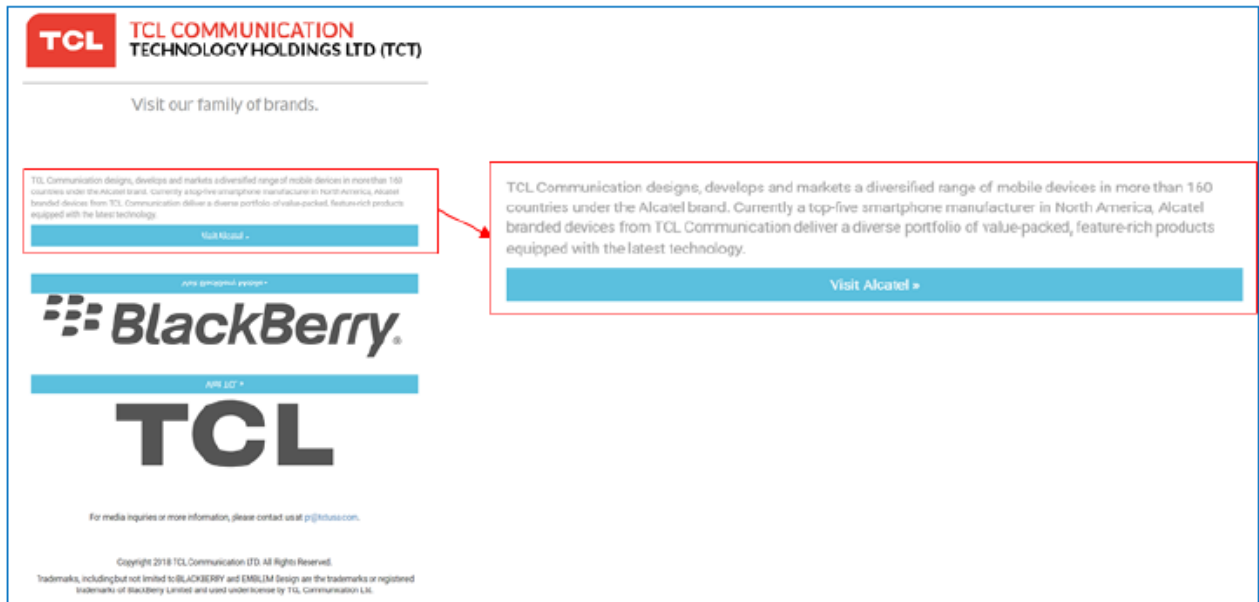
Courtroom: 10A, 10th Floor

23
24 * RELATED CASE 2:20-cv-01252

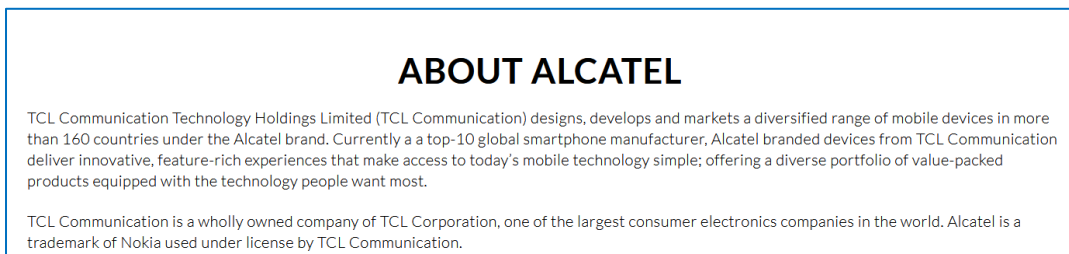
1 Republic of China, with a principal place of business at No. 86 Hechang Qi Lu Xi,
2 Zhongkai Gaoxin District, Huizhou City, Guandong Province, P.R. China.

3 7. TCT Mobile (US) Inc. is a corporation organized and existing under the
4 laws of Delaware with a principal place of business at 25 Edelman, Suite 200,
5 Irvine, California 92618.

6 8. Upon information and belief, TCL is licensed to make, use, and sell
7 Alcatel-branded mobile devices in the United States.

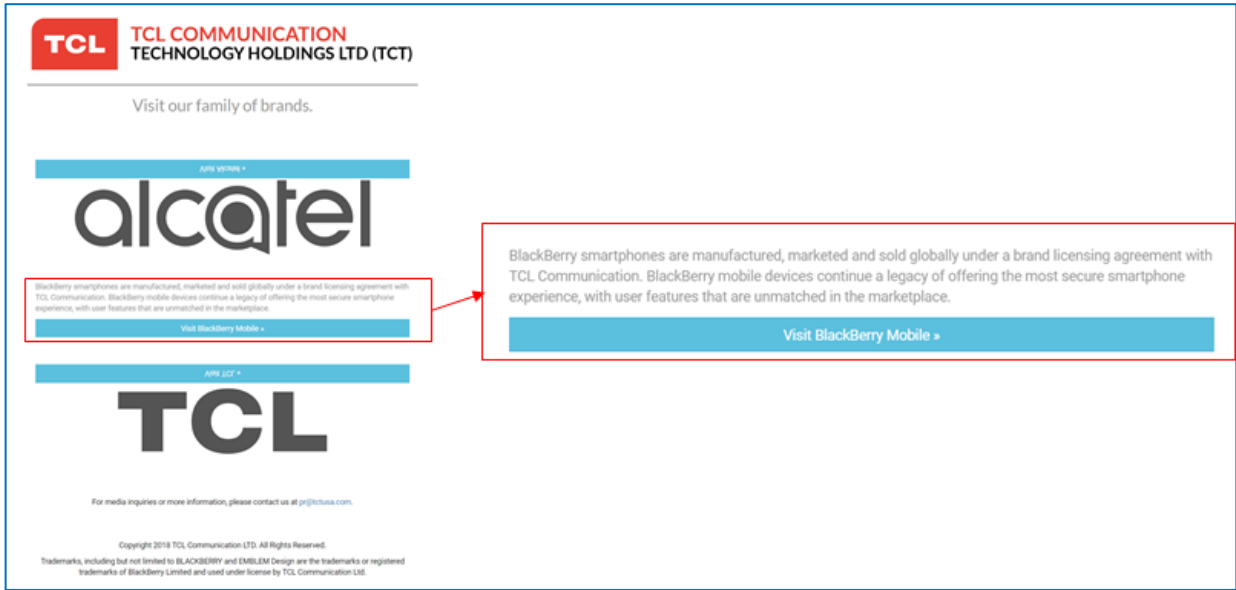


16 <http://www.tctusa.com/>



22 <https://us.alcatelmobile.com/about-us/>

23 9. Upon information and belief, TCL is licensed to make, use, and sell
24 Blackberry-branded mobile devices in the United States.



<http://www.tctusa.com/>

About Us

BlackBerry smartphones are manufactured, marketed and sold globally under a brand licensing agreement with TCL Communication. As a top-5 smartphone manufacturer in North America, and a top manufacturer globally, TCL Communication's portfolio of products – which include Alcatel, BlackBerry and TCL branded devices – are currently sold in over 160 countries throughout North America, Latin America, Europe, the Middle East, Africa and Asia Pacifica.

TCL Communication operates nine R&D centers worldwide, employing thousands across the globe. For more information, please visit www.TCLCOM.com.

For media inquiries, please email us at PR@TCTUSA.com.

<https://blackberrymobile.com/us/about-us/>

10. The Defendants identified in paragraphs 2-5 above are an interrelated group of companies which together comprise a manufacturer and seller of Android

1 mobile devices in the United States, including Android mobile devices that are sold
2 under the Alcatel and Blackberry brands.

3 II. JURISDICTION

4
5 11. This is an action for infringement of United States patents arising under
6 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject matter
7 jurisdiction of the action under 28 U.S.C. § 1331 and § 1338(a).

8 12. This Court has personal jurisdiction over Defendants pursuant to due
9 process and/or the California Long Arm Statute and additional based on admission
10 by way of the Declaratory Judgment Action and the parties’ stipulation contained in
11 Docket No. 22.

12 13. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b),
13 1391(c), and 1400(b) because (i) Defendants have done and continue to do business
14 in this district; (ii) Defendants have committed and continue to commit acts of patent
15 infringement in this district, including making, using, offering to sell, and/or selling
16 accused products in this district, and/or importing accused products into this district,
17 including by internet sales and sales via retail and wholesale stores, and/or inducing
18 others to commit acts of patent infringement in this district; and (iii) Defendants are
19 foreign entities.

20 14. Venue is proper as to Defendants based on the Declaratory Judgment
21 Action and on agreement/stipulation and also because they are organized under the
22 laws of the People’s Republic of China. 28 U.S.C. § 1391(c)(3) provides that “a
23 defendant not resident in the United States may be sued in any judicial district, and
24

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