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9 Attorneys for Plaintiff  
Ancora Technologies, Inc.

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

14 ANCORА TECHNOLOGIES,  
15 INC.

16 Plaintiff,

17 v.

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

21 Defendants.

**Case No. 8:19-cv-02192-GW-ASx**  
**(LEAD CASE)**

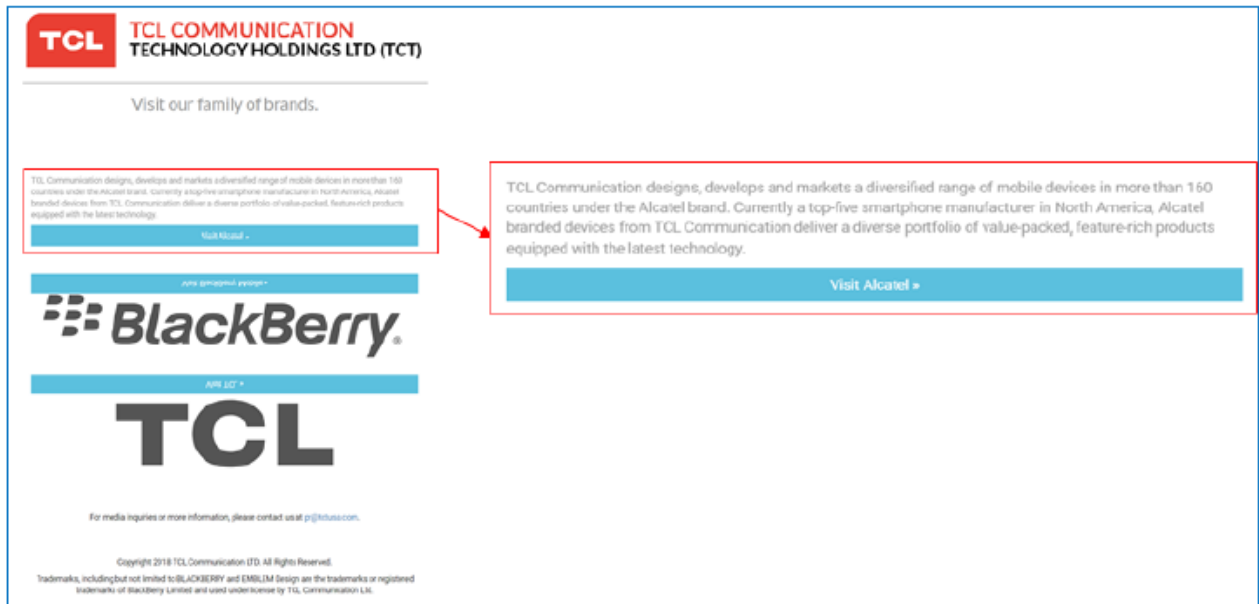
Consolidated Case No.:  
Case No. 2:20-cv-01252-GW-ASx

[Hon. George H. Wu]

**SECOND AMENDED COMPLAINT**



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

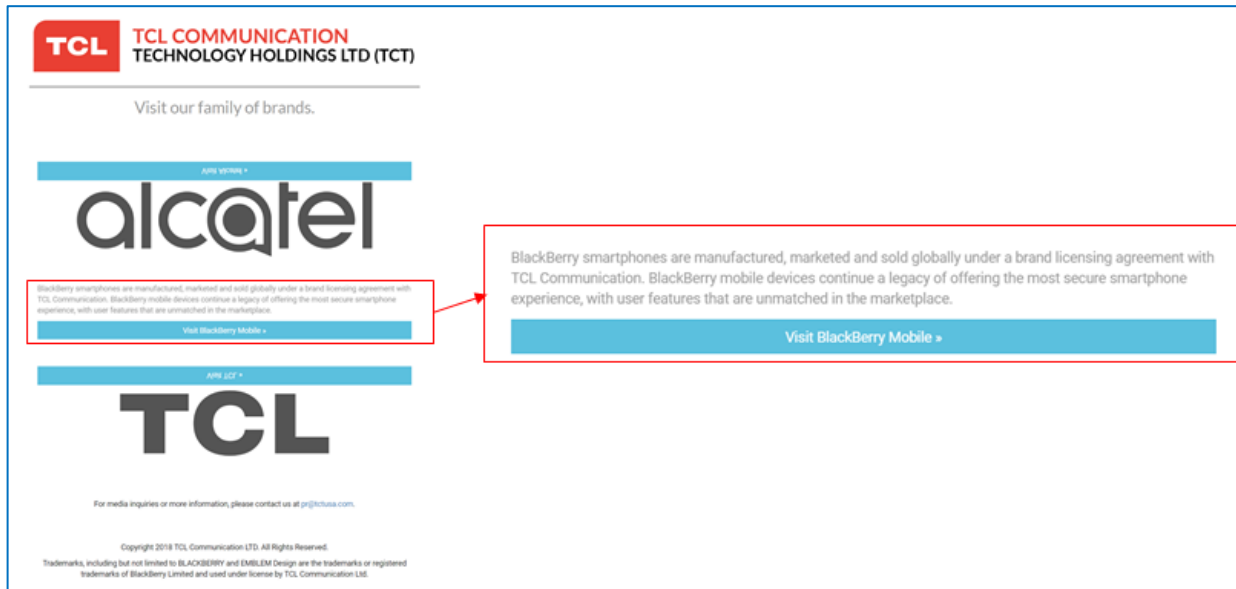


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10 <http://www.tctusa.com/>

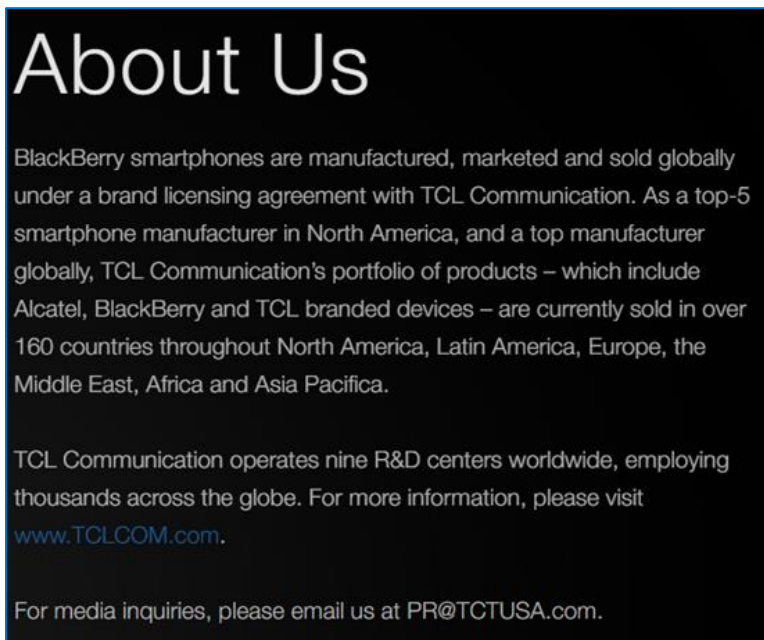


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16 <https://us.alcatelmobile.com/about-us/>

17 8. Upon information and belief, TCL is licensed to make, use, and sell  
18 Blackberry-branded mobile devices in the United States.  
19  
20  
21  
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23  
24



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



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

9. The Defendants identified in paragraphs 4-6 above are an interrelated group of companies which together comprise a manufacturer and seller of Android

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

## 3 **II. JURISDICTION**

4  
5 10. 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 11. This Court has personal jurisdiction over Defendants pursuant to due  
9 process and/or the California Long Arm Statute and additional based on admission by  
10 way of the Declaratory Judgment Action and the parties’ stipulation contained in  
11 Docket No. 22.

12 12. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c),  
13 and 1400(b) because (i) Defendants have done and continue to do business in this  
14 district; (ii) Defendants have committed and continue to commit acts of patent  
15 infringement in this district, including using the claimed process in this district; and  
16 (iii) Defendants are foreign entities.

17 13. Venue is proper as to Defendants based on the Declaratory Judgment  
18 Action and on agreement/stipulation and also because they are organized under the  
19 laws of the People’s Republic of China. 28 U.S.C. § 1391(c)(3) provides that “a  
20 defendant not resident in the United States may be sued in any judicial district, and  
21 the joinder of such a defendant shall be disregarded in determining where the action  
22 may be brought with respect to other defendants.”

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