

EXHIBIT L

information and belief, ZTE Corporation does business in Texas, directly or through intermediaries, and maintains its principal place of business in Shenzhen, China. ZTE offers its products and/or services, including those accused herein of infringement, to customers and potential customers located in Texas, including in the judicial Eastern District of Texas.

3. Upon information and belief, ZTE (USA) Inc. is a corporation organized and existing under the laws of the state of New Jersey, with its principal place of business at 2425 N. Central Expressway, Suite 600, Richardson, Texas 75080, and may be served with process through its registered agent, Jing Li, 2425 N. Central Expressway, Suite 323, Richardson, Texas 75080.

4. Upon information and belief, ZTE (TX) Inc. is a corporation organized and existing under the laws of the State of Texas, with its principal place of business at 2500 Dallas Parkway, Plano, Texas 75093 and may be served with process through its registered agent, Ferguson, Braswell & Fraser, PC at 2500 Dallas Parkway, Suite 501, Plano, Texas 75093. Upon information and belief, ZTE (TX) Inc. is a wholly-owned subsidiary of ZTE Hong Kong Ltd., which is in turn a wholly-owned subsidiary of ZTE Corporation.

JURISDICTION AND VENUE

5. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, et seq. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1338(a), and 1367.

6. This Court has personal jurisdiction over each Defendant. Defendants conduct substantial business and have committed acts of patent infringement and/or have induced acts of patent infringement by others in this Judicial District and/or have contributed to patent infringement by others in this Judicial District, the State of Texas, and elsewhere in the United

States. Each Defendant solicits business in the State of Texas, transacts business in the State of Texas and attempts to derive financial benefit from the residents of the State of Texas in this District, including benefits directly related to the instant patent infringement causes of action set forth herein, place products and services into the stream of commerce throughout the United States, including in this Judicial District, and have been and are actively engaged in transacting business in the State of Texas and in this Judicial District.

7. Venue is proper against each defendant in this Judicial District pursuant to 28 U.S.C. § 1400(b).

8. ZTE Corporation is a foreign corporation and is subject to venue in this Judicial District.

9. ZTE (USA) Inc. is registered to do business in the State of Texas, is headquartered in Richardson, Texas, and has established a call center in Plano, Texas with 60+ dedicated ZTE representatives. *See American GNC Corp. v. ZTE Corp., et al.*, Case No. 4:17-cv-00620-ALM-KPJ, Doc. No. 66, at 1 (E.D. Tex) (quoting Doc. No. 49-2 (sealed)); Doc. No. 77, at 6-7. Therefore, ZTE (USA) Inc. has a regular and established place of business in this Judicial District. ZTE (USA) Inc. imports, ships, distributes, offers for sale, sells, uses, and advertises its products (including but not limited to the products and services through its website, www.zteusa.com) in the Eastern District of Texas.

10. ZTE (TX) Inc. is incorporated in the State of Texas and, thus, resides in Texas. Venue is proper against ZTE (TX) Inc. in any Judicial District in Texas, including the Eastern District of Texas. *See Diem LLC v. BigCommerce, Inc.*, No. 6:17-cv-00186-JRG, 2017 WL 3187473, at *2-3 (E.D. Tex. July 26, 2017). ZTE (TX) Inc. has admitted that it uses the

allegedly infringing products in the Eastern District of Texas “as an end-user of consumer wireless equipment.” Doc. No. 28, at 1.

11. Venue is further proper because Defendants together have regular and established places of business in this Judicial District, including in Plano, are deemed to reside in this Judicial District, have committed acts of infringement in this Judicial District, and/or have purposely transacted business involving the accused products in this Judicial District.

PATENTS-IN-SUIT

12. On July 3, 2012, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,213,970 (the “’970 Patent”) entitled “Method of Utilizing Forced Alerts for Interactive Remote Communications.” A true and correct copy of the ’970 Patent is attached hereto as Exhibit A.

13. On August 2, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,408,055 (the “’055 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” A true and correct copy of the ’055 Patent is attached hereto as Exhibit B.

14. On September 13, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,445,251 (the “’251 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” A true and correct copy of the ’251 Patent is attached hereto as Exhibit C.

15. On October 11, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,467,838 (the “’838 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” A true and correct copy of the ’838 Patent is attached hereto as Exhibit D.

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