IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNILOC 2017 LLC,
 	
    Plaintiff,
 	
v.
 	
MOTOROLA MOBILITY, LLC,
 	
    Defendant.
	Civil Action No. _____
	
	JURY TRIAL DEMANDED

COMPLAINT

Plaintiff, Uniloc 2017 LLC ("Uniloc"), for its Complaint against defendant, Motorola Mobility, LLC ("Motorola"), alleges:

THE PARTIES

1.   Uniloc 2017 LLC is a Delaware limited liability company having addresses at 1209 Orange Street, Wilmington, Delaware 19801; 620 Newport Center Drive, Newport Beach, California 92660; and 102 N. College Avenue, Suite 303, Tyler, Texas 75702.

2.   Uniloc owns all substantial rights, interest, and title in U.S. Patent No. 6,836,654, entitled ANTI-THEFT PROTECTION FOR A RADIOTELEPHONY DEVICE, issued December 28, 2004 ("the '654 Patent"). A copy of the '654 Patent is attached as Exhibit A.

3.   Motorola is a Delaware corporation having a regular and established place of business in or around Chicago, Illinois.

JURISDICTION

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

PATENT INFRINGEMENT

5.   The '654 Patent describes in detail and claims in various ways inventions in systems and devices for improved blocking and unblocking of the operational mode of electronic devices such as cellphones, using timing and identifiers.

6.   The inventions claimed in the '654 Patent involve and cover more than just the performance of well-understood, routine, or conventional activities known to the industry prior to the invention of the '654 Patent.

7.   The written description of the '654 Patent describes in technical detail each of the limitations of the claims, allowing a person of ordinary skill in the art to understand what the limitations cover and how the combination of claim elements differed markedly from and improved upon what may have been considered conventional or generic.

8.   Motorola imports, uses, offers for sale, and sells electronic devices that utilize antitheft measures, including those designated: Moto G6 Series, Moro E5 Series, Moto X4 Series, Moto Z2 Series, Moto G5 Series, Moto E4 Series, Moto Z series, Moto G Series, Moto G4 Series, Moto C Series, Moto X Series, Moto XT-XXX Series, Moto MT-XXX Series, Moto ME-XXX Series, Moto E3 Series, Moto E Series, Moto G4 Series, Moto M Series, Moto 360 Series, Moto Maxx, MotoGO TV, Motoluxe Series, MotoKey Series, Droid Turbo Series, Droid Maxx Series, Droid Ultra Series, Droid Mini Series, Droid RAZR Series, Droid 3, Droid 4, Droid XYBOARD, Droid Bionic Series, Droid X Series, RAZR Series, Atrix Series, Xoom Series, Defy Series, Electrify Series, XT-XXX Series, PhotonQ, Admiral XT-XXX, Milestone Series, EX-XXX Series, Nexus, Luge, MotoGo, Gleam+, ME632, WX294, Triumph, Photon 4G and Moto Cliq 2 (collectively, "Accused Infringing Devices").

9.   The Accused Infringing Devices are mobile radiotelephony devices incorporating antitheft technology that utilizes timing and identification codes to block and unblock normal operation of the device.

10.   As set forth in the claim chart attached as Exhibit B, Motorola has infringed, and continues to infringe, at least claims 1, 3-5, and 7 of the '654 Patent by making, using, offering for sale, selling, and importing the Accused Infringing Devices.

11.   Motorola knowingly and intentionally incorporates into the Accused Infringing Devices components and software intended by Motorola to enable the devices to operate as described above to infringe the '654 Patent.

12.   In its marketing, promotional, and instructional materials, including those identified below, Motorola intentionally instructs its customers to use the Accused Infringing Devices in a manner that causes the devices to infringe the asserted claims of the '654 Patent.

13.   Motorola has also infringed, and continues to infringe, claims 1, 3-5, and 7 of the '654 Patent by actively inducing others to use, offer for sale, and sell the Accused Infringing Devices. Motorola's customers who use those devices in accordance with Motorola's instructions and intent and knowledge infringe claims 1, 3-5, and 7 of the '654 Patent. Motorola intentionally instructs and induces its customers to infringe through training videos, demonstrations, brochures, installation and user guides, and instructional and marketing materials, such as:

- https://motorola-global-portal-en-
  ca.custhelp.com/ci/fattach/get/1064475/1418241388/
  redirect/1/session/L2F2LzEvdGltZS8xNTMxMjIwNDE5L3NpZC9JdVBOaWpSbg
  ==/filename/68017754001c.pdf:

On, off, lock & unlock

Your touchscreen is on when you need it and off when you don't. To turn the screen on, press the Power key.

- **Screen off & on:** Press the Power key to turn the screen off & on.
- **Screen lock:** To unlock the screen, touch 🔒 and drag up. To use a password, pattern, PIN, or facial recognition security to unlock your screen, touch Apps (⋮⋮⋮) → ⚙ **Settings** → **Security** → **Screen lock** (see "**Screen lock**").

- https://motorola-global-portal.custhelp.com/app/answers/indevice_detail/a_id/
  112159/p/30,67209833:

Security features - Moto Z Force

Your device has several different lock options available. If a lock is set for your screen, the screen goes dark and locks when the display goes to sleep or if you press the Power button.

To access your lock options, touch ⋮⋮⋮ > **Settings** > **Security** > **Screen lock**

Screen Lock Options

- **Swipe** - provides no protection, but lets you get to the Home screen quickly.
- **Pattern** - lets you draw a simple pattern with your finger to unlock the phone.
- **PIN** - requires four or more numbers. Longer PINs tend to be more secure.
- **Password** - requires four or more letters or numbers. This is the most secure option, as long as you create a strong password.

Important note: Your phone may contain security policies set by your IT administrator which may override any settings you attempt to set under screen security. Please contact your IT Admin for more information.

Automatically lock

Set the period of time after sleep, to lock your phone, except when kept unlocked by Smart Lock

Power button instantly locks

The power button will instantly lock your screen, except when kept unlocked by Smart Lock

Lock Screen Message

Add a lock screen message for anyone that finds your phone.

See also:

- moto x4 play User Guide, "Control with one touch"/"On, off, lock & unlock"

- moto z3 play User Guide, "Protect your phone"

- moto g6 play User Guide, "Protect your phone"

- moto e5 play User Guide, "Protect your phone"

14.   Motorola has infringed, and continues to infringe, claims 1, 3-5, and 7 of the '654 patent by offering to sell, selling, and importing the Accused Infringing Devices knowing that the devices are used in infringing the '654 patent, and constitute a material part of the invention. Motorola knows portions of the Accused Infringing Devices to be especially made or especially adapted such that, when in use by Motorola's customers as Motorola designed the Accused Infringing Devices and intends them to be used, the devices infringe the '654 patent as shown in Exhibit B. Motorola knows those portions of the Accused Infringing Devices are not staple articles or commodities of commerce suitable for substantial non-infringing use.

15.   Motorola has been on notice of the '654 Patent since, at the latest, the service upon it of the original complaint in Case No. 1:18-cv-01230-LPS. Motorola has also been on notice of Uniloc's infringement allegations and theory of infringement since that date of service, and thus has known that its continued actions would induce and contribute to the infringement of claims of the '654 Patent. Despite that knowledge, and as further evidence of its intent, Motorola has refused to discontinue its infringing acts. Motorola has also induced and contributed to infringement by failing to remove the infringing functionality from the Accused Infringing Devices or otherwise place a non-infringing limit on their use.

DOCKET ALARM

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