## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNILOC 2017 LLC,

Civil Action No. 1:19-cv-11272

Plaintiff,

v.

PAYCHEX, INC.,

Defendant.

JURY TRIAL DEMANDED

## **COMPLAINT**

Plaintiff, Uniloc 2017 LLC ("Uniloc"), for its complaint against defendant, Paychex, Inc. ("Paychex"), alleges:

## THE PARTIES

1. Uniloc is a Delaware limited liability company.

2. Paychex is a Delaware corporation having regular and established places of business in Boston, Quincy, and Foxboro, Massachusetts.

## **JURISDICTION**

3. 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).

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

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

5. Uniloc is the owner, by assignment, of U.S. Patent No. 6,324,578 ("the '578 Patent"), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR MANAGEMENT OF CONFIGURABLE APPLICATION PROGRAMS ON A NETWORK,

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which issued on November 27, 2001 on an application filed on December 14, 1998. A copy of the '578 Patent is attached as Exhibit A.

6. The following image from www.paychex.com/products/ identifies services offered online by Paychex:

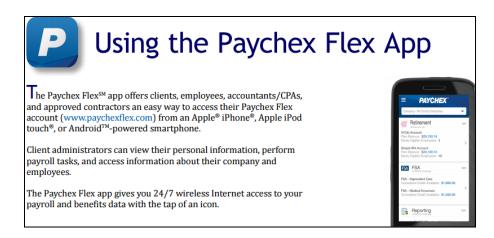
Payroll & Taxes	Human Resources	
ExpenseWire®	COBRA Administration	
Online Payroll Services	Custom Employee Handbook	
Employee Access Online	Employee Screening Services	
Ceneral Ledger Service	HR Essentials	
Paychex Flex <sup>SM</sup>	HR Online	
Reports Center	Paychex HR Solutions	
Paychex Flex Time	Paychex PEO	
Paychex Payroll Services	Safety Programs	

7. The following image from https://myapps.paychex.com/landing\_remote/login.do?

shows that Flex could be accessed through the Paychex web browser:

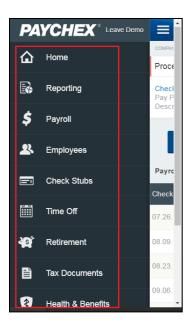
Paychex Flex Login				
Enter Username				
demo@gmail.com	Next			
Sign-Up • Forgot Username or Password? Did you forget your username?				

8. The following image from http://static.paychexinc.com shows that the Flex app could be downloaded to mobile devices from sites such as Google Play and iTunes:



9. The following image from www.paychex.com/demos/mobile-app/ shows the

mobile device interface that identified several Flex applications offered by Paychex:



10. The following image from https://uxmag.com shows that the Flex software products could be accessed on mobile devices:

Paychex Flex Usern	lame
Password	
Remember Me	Log In
View Demo	Security Info
View Demo	Security Info
Privacy information	

The following image from http://static.paychexinc.com shows that the user was 11.

offered numerous ways in which to configure the Paychex dashboard:

Customizing the Dashboard			
You can customize how the Paychex Flex app displays your data.			
<ul> <li>To customize the dashboard in the module you wish to edit, tap Edit.</li> </ul>			
<ul> <li>To display or hide items, slide or tap </li> <li>(On) or </li> </ul>			
Tap Save.			
The dashboard is controlled by your company profile and subscribed products. For example, payroll-only users do not see Retirement and FSA, just Check Stubs and Time Off.			

The following image from www.paychex.com/products/ illustrates the interface 12.

that opened when a user logged in to the Flex mobile application identifying products that the user

was authorized to use:

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	PAYCHEX®	
Com	pany - Company 1 🛛 🗸 🗸	
P	Paychex Time	
Paych	ex Time is now available for your s	>
	Reporting EI	лт
Journa	l: \$1,018.97 net on 03.21.15	>
\$	Payroll	
Payrol		>
2	Employees	
Employ	yees	>
6	Check Stubs	

The following image from www.gcccd.edu/auxiliary/ shows that the users' 13.

administrator could control access to features of the Flex software:

When you click the Actions icon, screen displays with a combination of these tabs to choose from: Punch, Time Sheet Entry, Period Entry, Percentage Entry, Template Entry and Express Entry. Each of these tabs will be defined and explained in this section.					
Note: If your screen looks different if your administrator has not enabled some of thes options.	е				
There may be any combination of these tabs to choose from: Punch, Time Sheet Entry, Period Entry, Percentage Entry, Template Entry and Express Entry. Each of these tabs will be defined and explained in this section.					
Punch Tab					
The punch tab enables you to view the current day's entries and to enter punches with more detail. This screen shows the current date, your status (for example, Working), your schedule for the day, your punches for the day and the punch icons.					
Note: Labor Levels are a customizable feature. The labor levels listed in this section (Location, Department, Sub-Department, Job) are examples and may be labele differently for your company.	d				

The following image from www.paychex.com shows that the administrator could 14.

decide what the user sees using the Flex software:

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