

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNILOC 2017 LLC,

Plaintiff,

v.

PAYCHEX, INC.,

Defendant.

Civil Action No. 1:19-cv-11272

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).

**COUNT I**

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

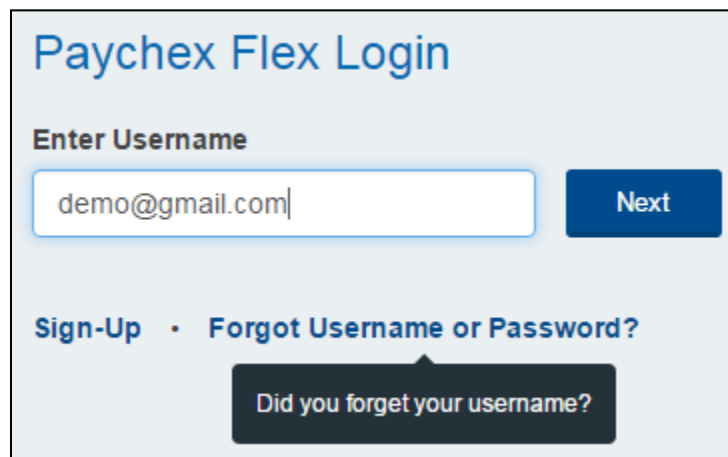
4. Uniloc incorporates by reference paragraphs 1-3 above.
5. Uniloc is the owner, by assignment, of U.S. Patent No. 6,324,578 (“the ‘578 Patent”), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR MANAGEMENT OF CONFIGURABLE APPLICATION PROGRAMS ON A NETWORK,

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.

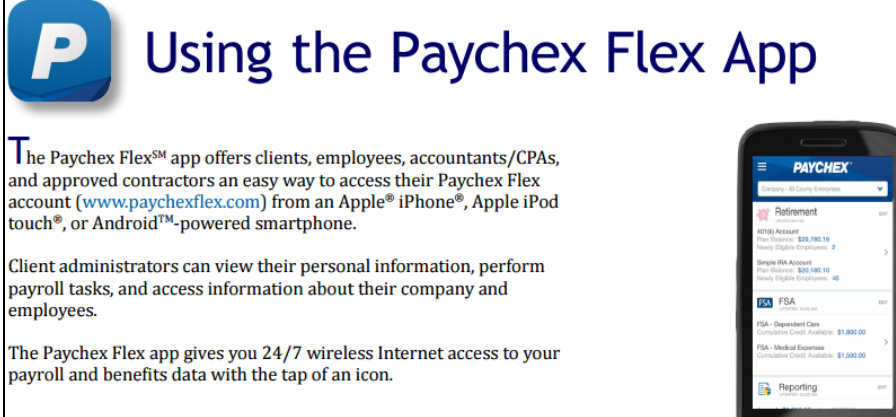
6. The following image from [www.paychex.com/products/](http://www.paychex.com/products/) identifies services offered online by Paychex:



7. The following image from [https://myapps.paychex.com/landing\\_remote/login.do?](https://myapps.paychex.com/landing_remote/login.do?) shows that Flex could be accessed through the Paychex web browser:



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:

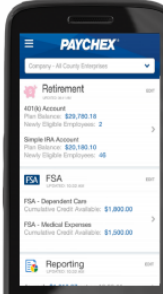


**P** Using the Paychex Flex App

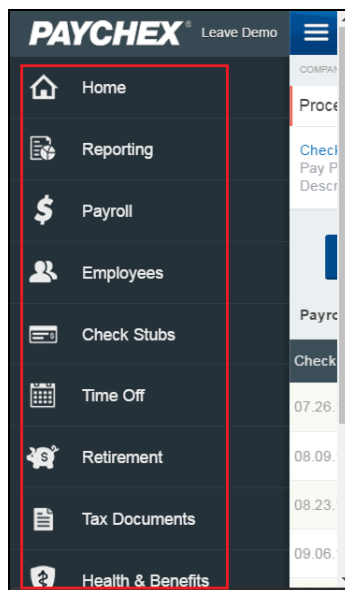
The Paychex Flex<sup>SM</sup> app offers clients, employees, accountants/CPAs, and approved contractors an easy way to access their Paychex Flex account ([www.paychexflex.com](http://www.paychexflex.com)) from an Apple® iPhone®, Apple iPod touch®, or Android™-powered smartphone.

Client administrators can view their personal information, perform payroll tasks, and access information about their company and employees.

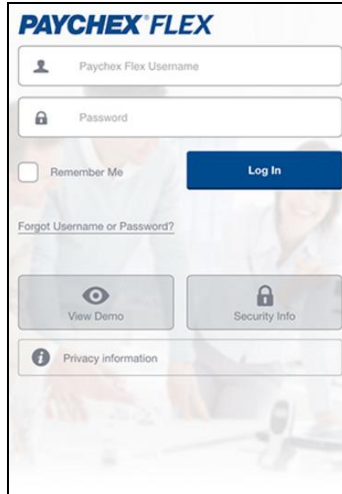
The Paychex Flex app gives you 24/7 wireless Internet access to your payroll and benefits data with the tap of an icon.



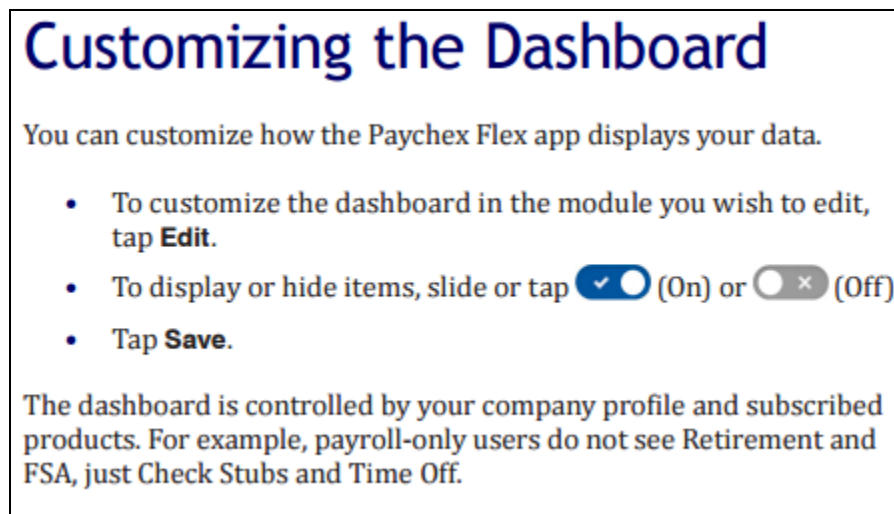
9. The following image from [www.paychex.com/demos/mobile-app/](http://www.paychex.com/demos/mobile-app/) shows the mobile device interface that identified several Flex applications offered by Paychex:



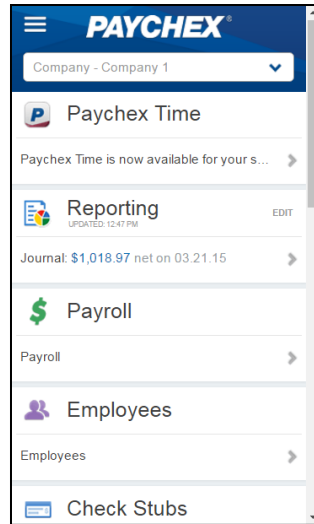
10. The following image from <https://uxmag.com> shows that the Flex software products could be accessed on mobile devices:



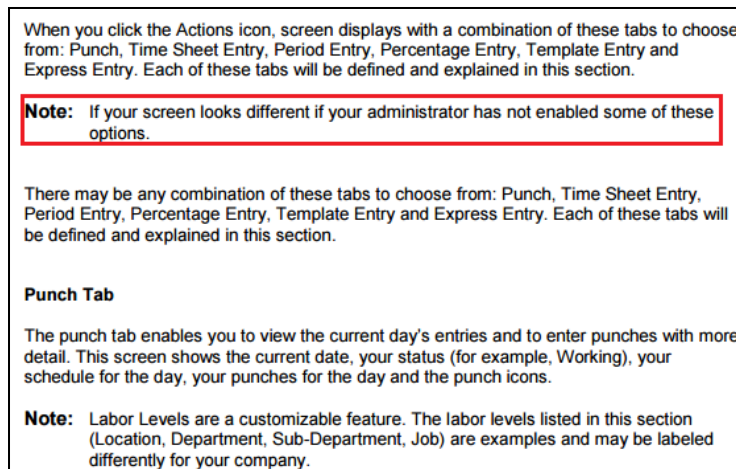
11. The following image from <http://static.paychexinc.com> shows that the user was offered numerous ways in which to configure the Paychex dashboard:



12. The following image from [www.paychex.com/products/](http://www.paychex.com/products/) illustrates the interface that opened when a user logged in to the Flex mobile application identifying products that the user was authorized to use:



13. The following image from [www.gcccd.edu/auxiliary/](http://www.gcccd.edu/auxiliary/) shows that the users' administrator could control access to features of the Flex software:



14. The following image from [www.paychex.com](http://www.paychex.com) shows that the administrator could decide what the user sees using the Flex software:

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