

Exhibit L

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Neo Wireless LLC,

Plaintiff,

v.

Apple Inc.

Defendant.

C.A. NO. 6:21-cv-00026-ADA

JURY TRIAL DEMANDED

PLAINTIFF’S FIRST AMENDED COMPLAINT

Plaintiff Neo Wireless LLC (“Plaintiff” or “Neo Wireless”) files this First Amended Complaint against Defendant Apple Inc. (“Apple”) for patent infringement under 35 U.S.C. § 271. Plaintiff alleges, based on its own personal knowledge with respect to its own actions and based upon information and belief with respect to all others’ actions, as follows:

THE PARTIES

1. Plaintiff Neo Wireless LLC is a Delaware corporation with its principal place of business located in Wayne, Pennsylvania.
2. On information and belief, Defendant Apple is a California corporation with its principal place of business located at One Apple Park Way, Cupertino, California 95014. Apple maintains several regular and established places of business in the Western District of Texas including at 12535 Riata Vista Circle and 5501 West Parmer Lane, Austin, Texas 78727; 2901 S. Capital of Texas Hwy, Austin, TX 78746; 3121 Palm Way, Austin, TX 78758; 8401 Gateway Boulevard West, El Paso, TX 79925; 15900 La Cantera Parkway, San Antonio, TX 78256; and 7400 San Pedro Avenue, San Antonio,

TX 78216. Moreover, Apple maintains seventeen regular and established storefront Apple Stores across the state of Texas.¹ Apple offers and sells its products and/or services, including those accused herein of infringement, to customers and potential customers located in Texas, including in the judicial Western District of Texas, such as at the Barton Creek Mall (2901 S. Capital of Texas Hwy) and in the Domain (3121 Palm Way) in Austin, Texas. Apple may be served with process through its registered agent for service in Texas: CT Corporation System, 1999 Bryan Street, Suite 900, Dallas Texas 75201.

3. On information and belief, seven of Apple's suppliers manufacture products, including those relevant to this Complaint, in the State of Texas. Cypress Semiconductor Corporation, Flex Limited, Samsung Electronics Company Limited, and Maxim Integrated Products Incorporated are all located within this judicial district. Hon Hai Precision Industry Company Limited (FoxConn) is located in the Dallas/Fort Worth metroplex.² On information and belief, Cypress Semiconductor, Apple's supplier, produces chips for use in Apple's Accused Instrumentalities in its Austin factory at Apple's direction and specification.³ On information and belief, Flex Limited or Flextronics, Apple's supplier, assembles infringing products in its Austin factory at

¹ <https://www.apple.com/retail/storelist/>

² <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-List.pdf>.

³ <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-List.pdf>; <https://www.investopedia.com/4-stocks-poised-to-gain-as-new-iphone-sales-beat-expectations-4769942>; <https://www.austinhomeseker.com/cypress-semiconductor.php>; <https://9to5mac.com/2020/02/26/iphone-fixed-broadcom-chip-flaw/>.

Apple's direction and specifications.⁴ On information and belief, Hon Hai Precision Industry or Foxconn, Apple's primary assembly supplier, has two plants for Apple products located in Fort Worth, Texas. At least one of these plants is a repair factory for Apple's products, including infringing products.⁵ On information and belief, Maxim Integrated, Apple's supplier, produces chips used in the Accused Instrumentalities in its San Antonio factory at Apple's direction and specifications.⁶ On information and belief, Qorvo, Apple's supplier, produces radio frequency chips used in the Accused Instrumentalities in its Richardson factory location at Apple's direction and specifications.⁷ On information and belief, Samsung, Apple's supplier, designs and produces chips used in the Accused Instrumentalities in its Austin factory (as discussed in greater detail below) at Apple's direction and specifications.

⁴ <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-List.pdf>; <https://www.bloomberg.com/news/articles/2020-04-04/apple-supplier-targets-production-of-30-000-ventilators-a-month>; <https://www.cnbc.com/2019/11/20/apple-ceo-tim-cook-and-president-trump-tour-texas-computer-factory.html>.

⁵ <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-List.pdf>; <https://focustaiwan.tw/sci-tech/201903090004>; <https://dallasinnovates.com/uta-teams-with-foxconn-to-help-reduce-iphone-fraudulent-claims1423/>.

⁶ <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-List.pdf>; <https://appleinsider.com/articles/12/07/19/made-in-america-apples-supply-chain-increasing-us-production>; https://en.wikipedia.org/wiki/Maxim_Integrated; <https://pdfserv.maximintegrated.com/en/pr/SanAntonio.pdf>.

⁷ <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-List.pdf>; <https://www.forbes.com/sites/greatspeculations/2020/05/29/qualcomm-qorvo-jabil-apple-suppliers-have-been-left-behind-from-the-rally-time-to-buy/#677ea6942257>; <https://www.fool.com/investing/2020/03/03/apple-supplier-qorvo-cuts-guidance-coronavirus.aspx>.

JURISDICTION AND VENUE

4. This action includes a claim of 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 and 1338(a).

5. This Court has personal jurisdiction over Apple. As indicated above, Apple conducts business and has committed acts of patent infringement and has induced and contributed to acts of patent infringement by others in this District, the State of Texas, and elsewhere in the United States.

6. Venue is proper in this judicial district per 28 U.S.C. §§ 1391 and 1400(b).

7. Apple has committed acts of infringement in this judicial district and maintains regular and established places of business in this district, as set forth above. Apple has continuous and systematic business contacts with the State of Texas. Apple, directly or through subsidiaries or intermediaries (including distributors, retailers, contract manufacturers, and others), conducts its business extensively throughout Texas, by shipping, manufacturing, distributing, offering for sale, selling, and advertising (including the provision of interactive web pages) its products and services in the State of Texas and the Western District of Texas.

8. Apple, directly or through subsidiaries or intermediaries (including distributors, retailers, contract manufacturers, and others), has purposefully and voluntarily placed its infringing products and services into this District and into the stream of commerce with the intention and expectation that they will be purchased and used by consumers in this District. Apple has offered and sold and continues to offer and sell these infringing products and services in this District, including at its seventeen

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