

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Solocron Media, LLC

Plaintiff,

v.

**Verizon Communications Inc., Cellco
Partnership d.b.a. Verizon Wireless,
AT&T Inc.,
AT&T Mobility LLC,
Sprint Corporation,
Sprint Communications Company L.P.,
Sprint Solutions Inc., and
T-Mobile USA, Inc.**

Defendants.

Case No.: 2:13-cv-1059

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Solocron Media, LLC (“Solocron” or “plaintiff”) hereby alleges for its Complaint for patent infringement against defendants Verizon Communications Inc. and Cellco Partnership d.b.a. Verizon Wireless (collectively, “Verizon”); AT&T Inc. and AT&T Mobility LLC (collectively, “AT&T”); Sprint Corporation (formerly known as Sprint Nextel Corporation), Sprint Communications Company L.P., and Sprint Solutions Inc. (collectively, “Sprint”); and T-Mobile USA, Inc. (“T-Mobile”) on personal knowledge as to its own actions and on information and belief as to the actions of others, as follows:

THE NATURE OF THE ACTION

1. This is a patent infringement action to end Verizon’s AT&T’s, Sprint’s, and T-Mobile’s (collectively, “Defendants”) unauthorized and infringing manufacture, use, sale,

offering for sale, and/or importation of products and methods incorporating Plaintiff Solocron's patented inventions.

2. Plaintiff Solocron holds all substantial rights and interest in the Patents-in-Suit described below, including the exclusive right to sue Defendants for infringement and recover damages.

3. Defendants make, use, sell, offer for sale, and import infringing products and provide infringing services in violation of the Patents-in-Suit. Plaintiff Solocron seeks injunctive relief to prevent Defendants from continuing to infringe Solocron's patent rights. Plaintiff Solocron further seeks monetary damages and prejudgment interest for defendants' past infringement of the Patents-in-Suit.

4. This is an exceptional case, and Solocron requests damages, enhanced damages, attorneys' fees, costs, and expenses.

THE PARTIES

5. Plaintiff Solocron is a Texas corporation with its principal place of business at 625 Chase Drive, Suite 200, Tyler, Texas 75701.

6. On information and belief, defendant Verizon Communications Inc. is a corporation existing and organized under the laws of Delaware and has its principal place of business at 140 West Street, 29th Floor, New York, NY 10007. Verizon Communications Inc. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, C T Corporation System, located at 350 North St. Paul St., Ste. 2900, Dallas, Texas 75201.

7. On information and belief, defendant Cellco Partnerships d.b.a. Verizon Wireless is a general partnership existing and organized under the laws of Delaware, is doing business as

Verizon Wireless, and has its principal place of business at One Verizon Way, Basking Ridge, New Jersey 07920. Cellco Partnerships d.b.a. Verizon Wireless is doing business in the Eastern District of Texas and can be served through its registered agent for service, the Corporation Trust Company, located at Corporation Trust Center 1209 Orange St., Wilmington, New Castle, DE 19801.

8. On information and belief, defendant AT&T Inc. is a corporation existing and organized under the laws of Delaware and has its principal place of business in Texas at 208 S. Akard St., Dallas, TX 75202. AT&T Inc. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, C T Corporation System, located at 350 North St. Paul St., Ste. 2900, Dallas, Texas 75201.

9. On information and belief, defendant AT&T Mobility LLC is a corporation existing and organized under the laws of Delaware and has its principal place of business at 5565 Glenridge Connector, Atlanta, GA 30349. AT&T Mobility LLC is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, C T Corporation System, located at 350 North St. Paul St., Ste. 2900, Dallas, Texas 75201.

10. On information and belief, defendant Sprint Corporation was formerly known as Sprint Nextel Corporation, is a corporation existing and organized under the laws of Delaware, and has its principal place of business at 6200 Sprint Parkway, Overland Park, KS 66251. Sprint Corporation is doing business in the Eastern District of Texas, and can be served through its registered agent for service, the Corporation Service Company, located at 2711 Centerville Rd., Ste. 400 Wilmington, New Castle, DE 19808.

11. On information and belief, defendant Sprint Communications Company L.P. is a limited partnership existing and organized under the laws of Delaware and has its principal place of business at 8140 Ward Parkway, Kansas City, MO 64114. Sprint Communications Company L.P. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, The Prentice-Hall Corporation System, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

12. On information and belief, defendant Sprint Solutions Inc. is a corporation existing and organized under the laws of Delaware and has its principal place of business at 701 Brazos St., Ste. 1050, Austin, Texas 78701. Sprint Solutions Inc. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, the Corporation Service Company, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

13. On information and belief, defendant T-Mobile USA, Inc. is a corporation existing and organized under the laws of Delaware and has its principal place of business at 12920 SE 38th Street, Bellevue, WA 98006. T-Mobile USA, Inc. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, the Corporation Service Company, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

JURISDICTION AND VENUE

14. This action for patent infringement arises under the patent laws of the United States, Title 35 of the United States Code.

15. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

16. Founded in 2011, Plaintiff Solocron is registered to do business in Texas and is doing business in the Eastern District of Texas. Solocron's flagship product, Loopdoodle, which is one embodiment of the inventions in the Patents-in-Suit, was substantially developed in Tyler, Texas, and is currently offered for sale in Tyler, Texas. Solocron continues to conduct research and development activities in Tyler, Texas. Solocron stores documents, including documents pertaining to this litigation, the Patents-in-Suit, corporate formation, email servers, and Loopdoodle in Tyler, Texas. Solocron currently employs five (5) employees in its Tyler, Texas office, including its general manager, Joshua Ebright, who is a full-time Tyler resident.

17. This Court has general and specific personal jurisdiction over defendant Verizon Communications Inc. Verizon Communications Inc. is registered to do business in Texas, and has identified CT Corporation System, 350 N. St. Paul St., Ste. 2900, Dallas, Texas 75201-4234 as its registered agent. Verizon Communications Inc. has substantial contacts with the forum as a consequence of conducting substantial business in the State of Texas and within this district. Verizon Communications Inc. is the parent corporation of Cellco Partnerships d.b.a. Verizon Wireless, a wholly-owned subsidiary, which is also doing business in Texas. On information and belief, Verizon Communications Inc., individually or through joint and concerted action through its operating subsidiaries: maintains retail store locations within Texas and this district; transacts business in Texas and/or in this district, including through the retail locations maintained within Texas and this district; offers for sale, sells, and advertises its products and services utilizing the claimed systems and methods with and for customers residing in Texas, including within this district; and provides products and services, including mobile device products and services, directly to consumers in Texas, including within this district. As detailed

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