

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

GARNET DIGITAL, LLC

Plaintiff,

v.

- (1) AT&T INC.;
- (2) AT&T MOBILITY LLC;
- (3) DELL INC.;
- (4) PANTECH WIRELESS, INC.;
- (5) HTC AMERICA, INC.;
- (6) HEWLETT-PACKARD COMPANY;
- (7) MOTOROLA MOBILITY LLC;
- (8) SONY ERICSSON MOBILE COMMUNICATIONS (USA) INC.;
- (9) GOOGLE INC.;
- (10) KYOCERA COMMUNICATIONS, INC.;
- (11) VERIZON COMMUNICATIONS, INC.;
- (12) CELLCO PARTNERSHIP (DBA VERIZON WIRELESS);
- (13) SPRINT SOLUTIONS, INC.;
- (14) SPRINT NEXTEL CORPORATION;
- (15) T-MOBILE USA, INC.;
- (16) BOOST MOBILE, LLC;
- (17) VIRGIN MOBILE USA, INC.;
- (18) VIRGIN MOBILE USA, L.P.;
- (19) METROPCS COMMUNICATIONS, INC.;
- (20) LEAP WIRELESS INTERNATIONAL, INC.;
- (21) STX WIRELESS OPERATIONS, LLC;
- (22) HUAWEI TECHNOLOGIES USA INC.;
- and
- (23) RADIOSHACK CORPORATION;

Defendants.

CIVIL ACTION NO. 6:11-cv-647

AMENDED COMPLAINT FOR
PATENT INFRINGEMENT

JURY TRIAL DEMANDED

Apple Inc.

Exh 1022

Plaintiff Garnet Digital, LLC (“Garnet”) files this amended complaint against the above-named defendants, alleging, based on its own knowledge with respect to itself and its own actions and based on information and belief as to all other matters, as follows:

PARTIES

1. Garnet is a limited liability corporation formed under the laws of the State of Texas, with a principal place of business in Plano, Texas.
2. Defendant AT&T Inc. is a corporation organized under the laws of the state of Delaware, with a principal place of business at 208 S. Akard Street; Dallas, TX 75202. AT&T Inc. can be served with process by serving its registered agent: CT Corporation System; 350 N. St. Paul Street, Ste. 2900; Dallas, TX 75201.
3. Defendant AT&T Mobility LLC (“AT&T Mobility”) is a limited liability company organized under the laws of the state of Delaware, with a principal place of business at 5565 Glenridge Connector, Ste. 510; Atlanta, GA 30342. AT&T Mobility can be served with process by serving its registered agent: CT Corporation System; 350 N. St. Paul Street, Ste. 2900; Dallas, TX 75201.
4. Defendant Dell Inc. (“Dell”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 1 Dell Way, Round Rock, TX 78682-7000. Dell can be served with process by serving its registered agent: Corporation Service Company; 211 East 7th Street, Ste. 620; Austin, TX 78701-3218.
5. Defendant Pantech Wireless, Inc. (“Pantech”) is a corporation organized under the laws of the state of Georgia, with a principal place of business at 5607 Glenridge Drive, Ste. 500; Atlanta, GA 30342. Under the Texas Long Arm Statute, as well as the Texas Business Corporations Act, Pantech can be served by serving the Secretary of State

because it is doing business in Texas but has not registered an agent for the service of process in Texas. The address of its home, home office, and principal office is 5607 Glenridge Drive, Ste. 500; Atlanta, GA 30342.

6. Defendant HTC America, Inc. (“HTC”) is a corporation organized under the laws of the state of Washington, with a principal place of business at 13920 SE Eastgate Way, Ste. 400; Bellevue, WA 98005. HTC can be served with process by serving its registered agent: National Registered Agents; 16055 Space Center, Ste. 235; Houston, TX 77062.

7. Defendant Hewlett-Packard Company (“HP”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 3000 Hanover Street; Palo Alto, CA 94304. HP can be served with process by serving its registered agent: CT Corporation System; 350 N. St. Paul Street, Ste. 2900; Dallas, TX 75201.

8. Defendant Motorola Mobility, LLC (“Motorola”) is a limited liability company organized under the laws of the state of Delaware, with a principal place of business at 1303 East Algonquin Road; Schaumburg, IL 60196. Motorola can be served with process by serving its registered agent: CT Corporation System; 350 N. St. Paul Street, Ste. 2900; Dallas, TX 75201.

9. Defendant Sony Ericsson Mobile Communications (USA) Inc. (“Sony Ericsson”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 7001 Development Drive; PO Box 13969; Research Triangle Park, NC 27709. Sony Ericsson can be served with process by serving its registered agent: Capitol Corporate Services, Inc.; 800 Brazos, Ste. 400; Austin, TX 78701.

10. Defendant Google Inc. (“Google”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 1600 Ampitheatre Parkway; Mountain View, CA 94043. Google can be served with process by serving its registered agent: Corporation Service Company dba CSC--Lawyers Incorporating Service Company; 211 East 7th Street, Ste. 620; Austin, TX 78701-3218.

11. Defendant Kyocera Communications, Inc. (“Kyocera”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 10300 Campus Point Drive; San Diego, CA 92121. Kyocera can be served with process by serving its registered agent: Corporation Service Company dba CSC--Lawyers Incorporating Service Company; 211 East 7th Street, Ste. 620; Austin, TX 78701-3218.

12. Defendant Verizon Communications, Inc. (“Verizon Communications”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 140 West Street; New York, NY 10007. Under the Texas Long Arm Statute, as well as the Texas Business Corporations Act, Verizon Communications can be served by serving the Secretary of State because it is doing business in Texas but has not registered an agent for the service of process in Texas. The address of its home, home office, and principal office is 140 West Street; New York, NY 10007.

13. Defendant Cellco Partnership (dba Verizon Wireless) (“Cellco”) is a partnership organized under the laws of the state of Delaware, with a principal place of business at One Verizon Way; Basking Ridge, NJ 07920. Under the Texas Long Arm Statute, as well as the Texas Business Corporations Act, Cellco can be served by serving the Secretary of State because it is doing business in Texas but has not registered an agent

for the service of process in Texas. The address of its home, home office, and principal office is One Verizon Way; Basking Ridge, NJ 07920.

14. Defendant Sprint Solutions, Inc. (“Sprint Solutions”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 701 Brazos St., Ste. 1050; Austin, TX 78701. Sprint Solutions can be served with process by serving its registered agent: Corporation Service Company dba CSC--Lawyers Incorporating Service Company; 211 East 7th Street, Ste. 620; Austin, TX 78701-3218.

15. Defendant Sprint Nextel Corporation (“Sprint Nextel”) is a corporation organized under the laws of the state of Kansas, with a principal place of business at 6200 Sprint Parkway; Overland Park, KS 66251. Under the Texas Long Arm Statute, as well as the Texas Business Corporations Act, Sprint Nextel can be served by serving the Secretary of State because it is doing business in Texas but has not registered an agent for the service of process in Texas. The address of its home, home office, and principal office is 6200 Sprint Parkway; Overland Park, KS 66251.

16. Defendant T-Mobile USA, Inc. (“T-Mobile”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 12920 SE 38th Street; Bellevue, WA 98006. T-Mobile can be served with process by serving its registered agent: Corporation Service Company; 211 East 7th Street, Ste. 620; Austin, TX 78701-3218.

17. Defendant Boost Mobile, LLC (“Boost”) is a limited liability company organized under the laws of the state of Delaware, with a principal place of business at 6200 Sprint Parkway, KSOPHF0302-3B124; Overland Park, KS 66251. Boost can be served with process by serving its registered agent: Corporation Service Company dba

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.