

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

GARNET DIGITAL, LLC

Plaintiff,

v.

- (1) APPLE, INC.;
- (2) SAMSUNG ELECTRONICS AMERICA, INC.;
- (3) SAMSUNG TELECOMMUNICATIONS AMERICA, LLC;
- (4) AT&T INC.;
- (5) AT&T MOBILITY LLC;
- (6) DELL INC.;
- (7) PANTECH WIRELESS, INC.;
- (8) HTC AMERICA, INC.;
- (9) RESEARCH IN MOTION CORPORATION;
- (10) SHARP ELECTRONICS CORPORATION;
- (11) HEWLETT-PACKARD COMPANY;
- (12) LG ELECTRONICS U.S.A., INC.;
- (13) LG ELECTRONICS MOBILECOMM U.S.A., INC.;
- (14) MOTOROLA MOBILITY, INC.;
- (15) SONY ERICSSON MOBILE COMMUNICATIONS (USA) INC.;
- (16) CASIO AMERICA, INC.;
- (17) GOOGLE INC.;
- (18) VERIZON COMMUNICATIONS, INC.;
- (19) CELLCO PARTNERSHIP (DBA VERIZON WIRELESS);
- (20) SPRINT SOLUTIONS, INC.;
- (21) SPRINT NEXTEL CORPORATION;
- (22) T-MOBILE USA, INC.;
- (23) BOOST MOBILE, LLC;
- (24) VIRGIN MOBILE USA, INC.;
- (25) VIRGIN MOBILE USA, L.P.;
- (26) UNITED STATES CELLULAR CORPORATION;
- (27) METROPCS COMMUNICATIONS,

CIVIL ACTION NO. 6:11-cv-647

ORIGINAL COMPLAINT FOR
PATENT INFRINGEMENT

JURY TRIAL DEMANDED

Apple Inc.

Exh. 1022

- INC.;
- (28) LEAP WIRELESS INTERNATIONAL,
INC.;
- (29) STX WIRELESS OPERATIONS, LLC;
- (30) HUAWEI TECHNOLOGIES USA INC.;
- (31) ZTE (USA) INC.; and
- (32) RADIOSHACK CORPORATION;

Defendants.

Plaintiff Garnet Digital, LLC (“Garnet”) files this original 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 Apple, Inc. (“Apple”) is a corporation organized under the laws of the state of California, with a principal place of business at 1 Infinite Loop, Cupertino, CA 95014. Apple 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 Samsung Electronics America, Inc. (“Samsung Electronics”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 105 Challenger Road; Ridgefield Park, NJ 07660. Samsung Electronics 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 Samsung Telecommunications America, LLC (“STA”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 1301 East Lookout Drive; Richardson, TX 75082-4124. STA 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 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.

6. 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.

7. 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.

8. 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.

9. 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.

10. Defendant Research In Motion Corporation (“RIM”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 122 West John Carpenter Parkway, Ste. 430; Irving, TX 75039. RIM can be served with process by serving its registered agent: CT Corporation System; 350 N. St. Paul Street, Ste. 2900; Dallas, TX 75201.

11. Defendant Sharp Electronics Corporation (“Sharp”) is a corporation organized under the laws of the state of New York, with a principal place of business at Sharp Plaza; Mahwah, NJ 07430. Sharp can be served with process by serving its registered agent: CT Corporation System; 350 N. St. Paul Street, Ste. 2900; Dallas, TX 75201.

12. 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.

13. Defendant LG Electronics U.S.A., Inc. (“LG Electronics”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at 920 Sylvan Ave.; Englewood Cliffs, NJ 07632. LG Electronics can be served with process by

serving its registered agent: United States Corporation Co.; 211 East 7th Street, Ste. 620; Austin, TX 78701-3218.

14. Defendant LG Electronics MobileComm U.S.A., Inc. (“LG Mobile”) is a corporation organized under the laws of the state of California, with a principal place of business at 10101 Old Grove Road; San Diego, CA 92131. LG Mobile can be served with process by serving its registered agent: National Registered Agents; 16055 Space Center, Ste. 235; Houston, TX 77062.

15. 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.

16. Defendant Casio America, Inc. (“Casio”) is a corporation organized under the laws of the state of New York, with a principal place of business at 570 Mount Pleasant Ave.; Dover, NJ 07801. Casio can be served with process by serving its registered agent: United States Corp Company; 211 East 7th Street, Ste. 620; Austin, TX 78701-3218.

17. 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.

18. Defendant Kyocera Communications, Inc. (“Kyocera”) is a corporation organized under the laws of the state of Delaware, with a principal place of business at

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