

Ex. 1003

Complaint in Uniloc USA, Inc. and

Uniloc Luxembourg, S.A. v.

BitDefender LLC et al., Case No. 2:16-

cv-00394-RWS, E.D. Tex. (“E.D. Tex.

Complaint”)

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

	§	
UNILOC USA, INC. and	§	
UNILOC LUXEMBOURG, S.A.,	§	Civil Action No. 2:16-cv-394
	§	
Plaintiffs,	§	
	§	
v.	§	PATENT CASE
	§	
BITDEFENDER HOLDING B.V. and	§	
BITDEFENDER LLC,	§	
	§	
Defendants.	§	JURY TRIAL DEMANDED
	§	

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs, Uniloc USA, Inc. and Uniloc Luxembourg, S.A. (together “Uniloc”), as and for their complaint against defendants, BitDefender Holding BV and BitDefender LLC (together “BitDefender”), allege as follows:

THE PARTIES

1. Uniloc USA, Inc. (“Uniloc USA”) is a Texas corporation having a principal place of business at Legacy Town Center I, Suite 380, 7160 Dallas Parkway, Plano Texas 75024. Uniloc also maintains a placed of business at 102 N. College, Suite 603, Tyler, Texas 75702.

2. Uniloc Luxembourg S.A. (“Uniloc Luxembourg”) is a Luxembourg public limited liability company having a principal place of business at 15, Rue Edward Steichen, 4th Floor, L-2540, Luxembourg (R.C.S. Luxembourg B159161).

3. Uniloc Luxembourg owns a number of patents in the field of application management in a computer network.

4. Upon information and belief, BitDefender Holding B.V. is a Dutch private limited liability company with a principal place of business in Delft, Holland.

5. Upon information and belief, BitDefender LLC is a Florida limited liability company having a principal place of business in Fort Lauderdale, Florida and offering its products, including those accused herein of infringement, to customers and/or potential customers located in Texas and in the judicial Eastern District of Texas. BitDefender LLC may be served with process through its registered agent: Joel Friend Associates, Inc., 2863 Executive Park Drive, Suite 105, Weston, Florida 33331.

JURISDICTION AND VENUE

6. 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 pursuant to 28 U.S.C. §§ 1331, 1338(a) and 1367.

7. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c) and 1400(b). Upon information and belief, BitDefender is deemed to reside in this judicial district, has committed acts of infringement in this judicial district, and/or has purposely transacted business involving the accused products in this judicial district, including sales to one or more customers in Texas.

8. BitDefender is subject to this Court's jurisdiction pursuant to due process and/or the Texas Long Arm Statute due at least to its substantial business in this State and judicial district, including: (A) at least part of its past infringing activities, (B) regularly doing or soliciting business in Texas and/or (C) engaging in persistent conduct and/or deriving substantial revenue from goods and services provided to customers in Texas.

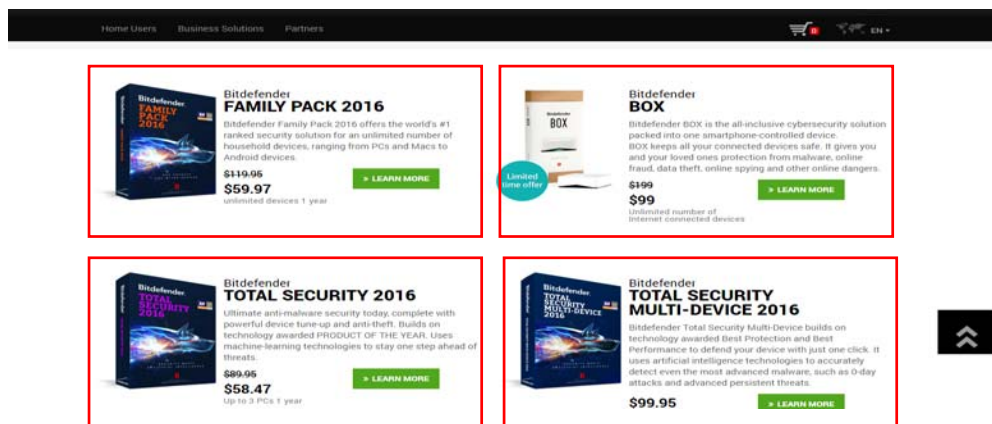
COUNT I (INFRINGEMENT OF U.S. PATENT NO. 6,510,466)

9. Uniloc incorporates paragraphs 1-8 above by reference.

10. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 6,510,466 (“the ’466 Patent”), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR CENTRALIZED MANAGEMENT OF APPLICATION PROGRAMS ON A NETWORK that issued on January 21, 2003. A true and correct copy of the ’466 Patent is attached as Exhibit A hereto.

11. Uniloc USA is the exclusive licensee of the ’466 Patent with ownership of all substantial rights therein, including the right to grant sublicenses, to exclude others, and to enforce, sue and recover past damages for the infringement thereof.

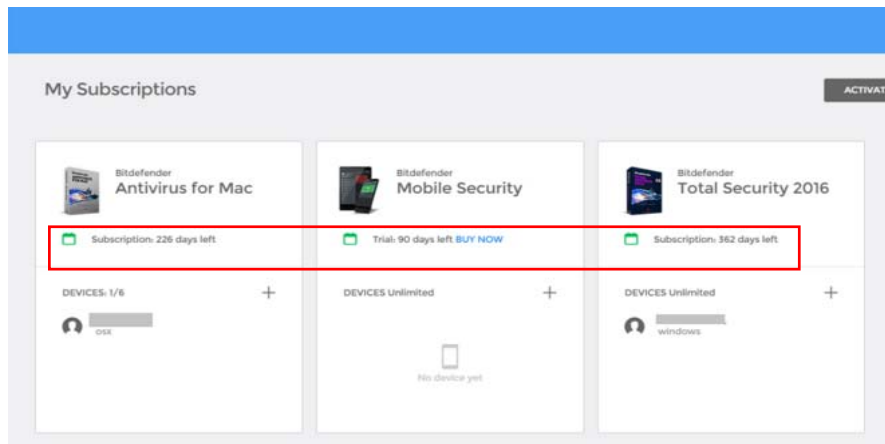
12. Upon information and belief, the following describes, at least in part, how BitDefender’s software licensing and delivery system works:



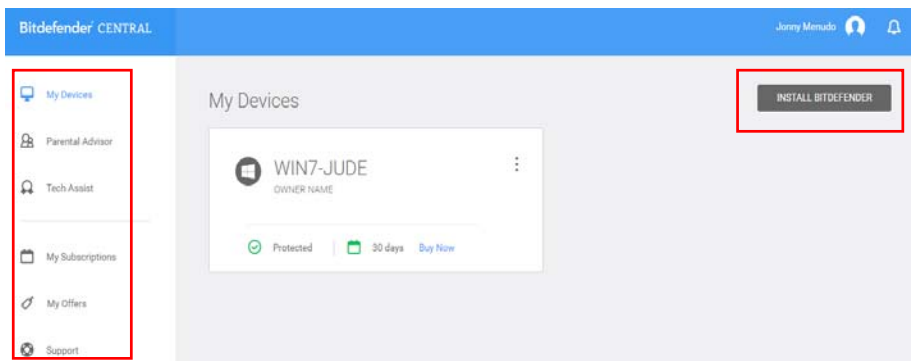
13. Upon information and belief, the following describes, at least in part, how BitDefender’s software licensing and delivery system works:



14. Upon information and belief, the following describes, at least in part, how BitDefender's software licensing and delivery system works:



15. Upon information and belief, the following describes, at least in part, how BitDefender's software licensing and delivery system works:



16. Upon information and belief, the following describes, at least in part, how BitDefender's software licensing and delivery system works

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