

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

SYNKLOUD TECHNOLOGIES, LLC, a)	
Delaware limited liability company,)	
)	
Plaintiff,)	Civil Action No. 6:19-cv-00526
)	
v.)	
)	JURY TRIAL DEMANDED
DROPBOX, INC., a Delaware corporation,)	
)	
Defendant.)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff SynKloud Technologies, LLC (“SynKloud” or “Plaintiff”) hereby alleges for its Complaint for Patent Infringement against Dropbox, Inc. (“Dropbox” or “Defendant”) the following:

NATURE OF THE ACTION

1. This is an action for patent infringement of United States Patent Nos. 8,606,880 (the “880 Patent”); 8,856,195 (the “195 Patent”); 8,868,690 (the “690 Patent”); 9,219,780 (the “780 Patent”); 9,239,686 (the “686 Patent”); and 10,015,254 (the “254 Patent”) (collectively, the “Patents-in-Suit”) arising under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*, seeking damages and other relief under 35 U.S.C. § 281, *et seq.*

THE PARTIES

2. Plaintiff SynKloud Technologies, LLC is a company organized under the laws of Delaware, with its principal place of business located at 124 Broadkill Road, #415, Milton, Delaware 19968.

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3. Defendant Dropbox, Inc. is a corporation organized under the laws of Delaware with its principal place of business located at 333 Brannan Street, San Francisco, California 94107. Dropbox's registered agent for Service of Process is located at Corporation Service Company, d/b/a CSC, 211 E. 7th Street Suite 620, Austin, Texas 78701.

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the provisions of the Patent Laws of the United States of America, Title 35, United States Code.

5. This Court has subject matter jurisdiction over SynKloud's claims under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendant in this action because Defendant has committed acts within the Western District of Texas, giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over the Defendant would not offend traditional notions of fair play and substantial justice. The Defendant, directly and through subsidiaries or intermediaries, has committed and continues to commit acts of infringement in this District by, among other things, offering to sell and selling products and/or services that infringe the asserted patents.

7. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b), (c) and/or 28 U.S.C. § 1400(b). Defendant transacts business within this District and offers for sale in this District products that infringe the Patents-in-Suit. Defendant is registered to do business in Texas. Defendant has a regular and established place of business in Western District of Texas. For example, Defendant has an office in Austin, Texas where it employs sales and user operations teams. Dropbox chose Austin for its second U.S. location and has stated that in

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Austin, they are building out its “sales and channel, customer experience and people teams for the Americas.” (<https://www.dropbox.com/jobs/locations/austin> as of August 23, 2019).

PATENT OWNERSHIP AND EXCLUSIVE RIGHT TO SUE

8. Plaintiff is the owner of the Patents-in-Suit asserted in this action and has the exclusive right to sue and collect remedies for past, present, and future infringement of the Patents-in-Suit.

ACCUSED PRODUCTS AND/OR SERVICES

9. Defendant manufactures, provides, uses, sells, offers for sale, imports, and/or distributes infringing services for storage, including, for example, Dropbox Cloud Personal, Plus, Professional, Standard, Advanced, Business and/or Enterprise Versions, using infringing Dropbox servers that operate with client-side Dropbox software that is connected through wireless networks including, for example, Dropbox Mobile Applications, Web browser interface and/or Desktop Applications (collectively, “Accused Products and/or Services”).

ACTUAL NOTICE AND KNOWLEDGE OF THE PATENTS-IN-SUIT

10. Defendant had actual notice and/or knowledge of the Patents-in-Suit since at least October 11, 2015 when the predecessor owner of the Patents-in-Suit sent a notice of patent infringement to Defendant, copy of the original attached as Exhibit 1-A that explicitly listed the '880 Patent, that is the Parent patent of the Patents-in-Suit, the '195 Patent and the '690 Patent.

11. Defendant again had actual notice of patent infringement and had knowledge at least on January 11, 2017 with a letter that explicitly listed the '780 Patent and the '686 Patent and included infringement claim chart attached copy as Exhibit 1-B. This was followed up with further correspondence on April 25, 2017 (attached copy as Exhibit 1-C), May 22, 2017

(attached copy as Exhibit 1-D) and October 6, 2017 (attached copy as Exhibit 1-E) in response to communications from Defendant.

12. Plaintiff followed up on the communications with Defendant on June 10, 2019, attached copy as Exhibit 1-F.

13. Defendant has had knowledge of the Patents-in-Suit and its infringement since at least the filing of the Original Complaint in this action, or shortly thereafter, including by way of this lawsuit.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 8,606,880

14. SynKloud reasserts and incorporates herein by reference the allegations of all preceding paragraphs of this Complaint as if fully set forth herein.

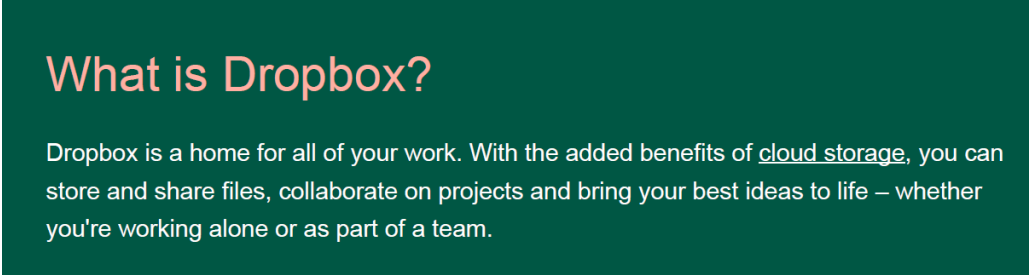
15. On December 10, 2013, the '880 Patent, entitled "Use of Wireless Devices' External Storage," was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '880 Patent is attached as Exhibit 2-A.

16. Defendant has infringed and continues to infringe at least claims 2, 7-17 of the '880 Patent under 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, the Accused Products and/or Services.

17. As just one non-limiting example, set forth in the claim chart, attached as Exhibit 3-A, is a description of exemplary claim 2 of the '880 Patent. Plaintiff reserves the right to modify this description, including on the basis of information it obtains during discovery.

18. For example, the Accused Products and/or Services meet all of the claim limitations of claim 2 of the '880 Patent, set forth below with claim language in italics. To the

extent the preamble is limiting, the Accused Products and/or Services include *a system for expanding storage capacity of a plurality of wireless devices, the system comprising a configured server.*



https://www.dropbox.com/features_ last visited on August 22, 2019.

19. The Accused Products and/or Services *allocate a storage space of a predefined capacity for each of the wireless devices, create a file system for the storage space allocated for the each of the wireless devices.*

	For individuals		For teams	
	Plus	Professional	Standard	Advanced
	Get started	Try for free or purchase now	Try for free or purchase now	Try for free or purchase now
Dropbox core features				
Storage	2 TB (2,000 GB)	3 TB (3,000 GB)	3 TB (3,000 GB)	As much space as needed
Best-in-class sync technology	✓	✓	✓	✓

<https://www.dropbox.com/plans?trigger=nr>

20. The Accused Products and/or Services *establish a link for each of the wireless devices access to the storage space.*

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