

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

SRC LABS, LLC & SAINT REGIS  
MOHAWK TRIBE,

Plaintiffs,

v.

AMAZON WEB SERVICES, INC.,  
AMAZON.COM, INC., &  
VADATA, INC.,

Defendants.

Case No. 2:17cv547  
JURY TRIAL DEMANDED

**PLAINTIFFS' ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

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Plaintiffs SRC Labs, LLC and Saint Regis Mohawk Tribe file this Original Complaint for Patent Infringement (“Complaint”) against Defendants Amazon Web Services, Inc., Amazon.com, Inc. and VADATA, Inc. (collectively “Defendants”). Plaintiffs allege as follows:

### I. NATURE OF THE ACTION

1. This is an action for infringement of U.S. Patent Nos. 6,434,687, 7,149,867, 7,225,324, 7,620,800 and 9,153,311.

2. SRC Labs, LLC is a Texas limited liability company and its parent is the successor to SRC Computers.

3. Saint Regis Mohawk Tribe (the “Tribe”) is a federally recognized, sovereign American Indian Tribe located in upstate New York.

4. Amazon.com, Inc. (“Amazon”) is a Delaware corporation with its principal place of business at 410 Terry Avenue North, Seattle, Washington 98109. Amazon may be served through its registered agent for service of process at Corporation Service Company, 271 Centerville Rd., Suite 300, Wilmington, Delaware 19808.

5. Amazon Web Services, Inc. (“AWS”) is a Delaware corporation headquartered at 410 Terry Avenue North, Seattle Washington 98109. AWS is a wholly-owned subsidiary of Amazon. AWS has been registered to do business in Virginia since January 25, 2013 (SCC ID F1918947). AWS’s Registered Agent/Registered Office is Corporation Service Company, Bank of America Center 16<sup>th</sup> Floor, 1111 East Main Street, Richmond Virginia, 23219.

6. VADATA, Inc. (“VADATA”) is a Delaware corporation with offices and employees in the Commonwealth of Virginia. VADATA is a wholly-owned subsidiary of Amazon.

VADATA's Registered Agent/Registered Office is Corporation Service Company, Bank of America Center 16<sup>th</sup> Floor, 1111 East Main Street, Richmond Virginia, 23219.

## II. JURISDICTION

7. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*, including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This is a patent infringement lawsuit, over which this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

8. This Court has general and specific personal jurisdiction over Defendants because they are present in and transact and conduct business in and with residents of this District and the Commonwealth of Virginia.

9. Plaintiffs' causes of action arise, at least in part, from Defendants' contacts with and activities in the Commonwealth of Virginia and this District.

10. In addition, upon information and belief, Defendants have committed acts of infringement within this District and this State by, *inter alia*, making, selling, offering for sale, importing, and/or using products that infringe one or more claims of the patents-in-suit.

11. Defendants, directly and through intermediaries, use, sell, ship, distributes offer for sale, and/or advertise or otherwise promote products in the Commonwealth of Virginia and this District. Defendants regularly conduct and solicit business in, engage in other persistent courses of conduct in, and/or derive substantial revenue from goods and services provided to residents of the Commonwealth of Virginia and this judicial District.

## III. VENUE

12. Venue is proper in this District because Defendants meet all three general requirements relevant to the inquiry: (1) Defendants have multiple physical places in the District (2) they are

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