

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

IGT and IGT CANADA SOLUTIONS, ULC,	§	
	§	
Plaintiffs,	§	C.A. No. 6:21-cv-00331-ADA
v.	§	
	§	JURY TRIAL DEMANDED
ZYNGA INC.,	§	
	§	
Defendant.	§	

**DEFENDANT'S OPPOSED MOTION TO TRANSFER VENUE TO THE AUSTIN
DIVISION OF THE WESTERN DISTRICT OF TEXAS**

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I. INTRODUCTION

Plaintiffs IGT (“IGT US”) and IGT Canada Solutions ULC (“IGT Canada”) (collectively, “IGT”) allege that the mobile games provided by Defendant Zynga Inc. (“Zynga”) infringe six of IGT’s patents. IGT US is headquartered in Las Vegas, and Zynga is headquartered in San Francisco, but both companies have offices in Austin, Texas. Zynga’s Austin office opened in 2011 and currently has 231 employees, including engineers who work on the products and/or features that IGT has accused of infringement. Upon information and belief, IGT US employs approximately 199 people in its Austin office. Neither company has *any* facilities or presence in the Waco Division of the Western District of Texas. In addition, IGT’s venue allegations focus solely on Austin, *see* First Amended Complaint (“FAC”) ¶ 8 (ECF No. 7), and IGT has not identified, in its FAC or elsewhere, any office locations, witnesses, documents, or evidence in the Waco Division. Because Austin is clearly a more convenient venue than Waco, Zynga hereby moves pursuant to 28 U.S.C. § 1404(a) for an intra-district transfer of this case to the Austin Division.

II. FACTUAL BACKGROUND

A. Plaintiffs, Potential Party Witnesses for Plaintiffs, and the Asserted Patents

IGT US is a Nevada corporation based in Las Vegas, Nevada. FAC, ¶ 2. IGT Canada is a Canadian unlimited liability company that conducts business out of New Brunswick, Canada. *Id.* at ¶ 3. Both are subsidiaries of International Game Technology PLC. *Id.* The parent company is purportedly incorporated and headquartered in the United Kingdom. *See* Ex. A-1 (cover of IGT PLC 2020 Annual Report).¹ IGT claims to have 4,400 U.S. employees, of which 2,800 are in

¹ Exhibits A-1 through A-5 and A-7 through A-13 cited herein are attached to and authenticated by the Declaration of Christopher Childers in Support of Zynga Inc.’s Motion to Transfer Venue under 28 U.S.C. § 1404(a).

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