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-393
	§	
Plaintiffs,	§	
	§	
v.	§	PATENT CASE
	§	
AVG TECHNOLOGIES USA, INC.,	§	
	§	
Defendant.	§	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 defendant, AVG Technologies USA, Inc. ("AVG"), 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 place 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, AVG is a Delaware corporation having a place of business at 149 Bluxome Street, San Francisco, California 94107 and offering its products and/or



services, including those accused herein of infringement, for purchase or download to customers and/or potential customers located in Texas and in the judicial Eastern District of Texas. Valve may be served with process through its registered agent: PHS Corporate Services, Inc., 1313 N. Market Street, Suite 5100, Wilmington, Delaware 19801.

JURISDICTION AND VENUE

- 5. 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.
- 6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c) and 1400(b). Upon information and belief, AVG 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.
- 7. AVG 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.

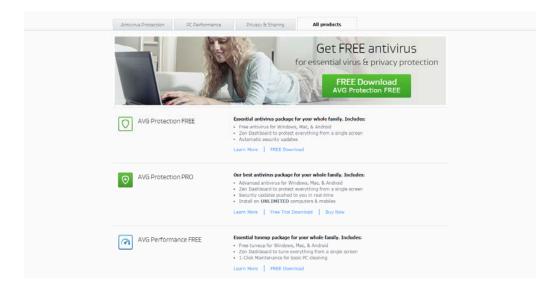
(INFRINGEMENT OF U.S. PATENT NO. 6,510,466)

- 8. Uniloc incorporates paragraphs 1-7 above by reference.
- 9. 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

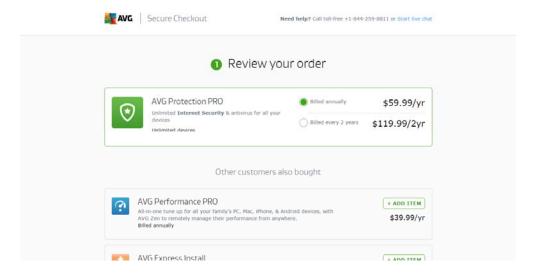


NETWORK that issued on January 21, 2003. A true and correct copy of the '466 Patent is attached as Exhibit A hereto.

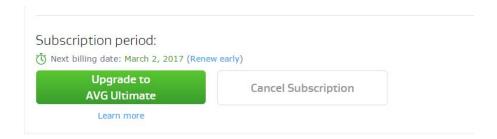
- 10. Uniloc USA is the exclusive licensee of the '466 Patent with ownership of all substantial rights therein, including the right to grant sublicenses, to exclude others, and to enforce, sue and recover past damages for the infringement thereof.
- 11. Upon information and belief, the following describes, at least in part, how AVG's software licensing and delivery system works:



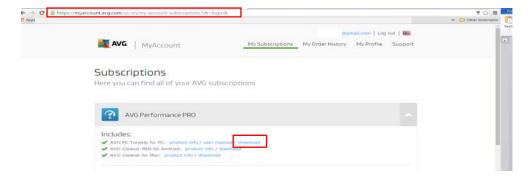
12. Upon information and belief, the following describes, at least in part, how AVG's software licensing and delivery system works:



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

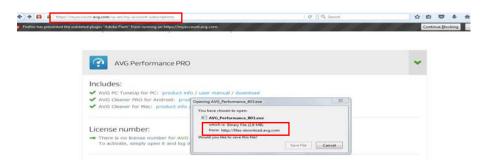


14. Upon information and belief, the following describes, at least in part, how AVG's software licensing and delivery system works:

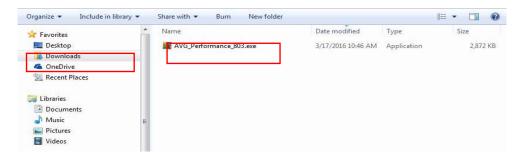


15. Upon information and belief, the following describes, at least in part, how AVG's software licensing and delivery system works:





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



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



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

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