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-725
Plaintiffs,	§ §	
v.	§ §	PATENT CASE
BEETALK PRIVATE LTD.,	§ § §	
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, BeeTalk Private Ltd. ("BeeTalk"), 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 text/voice instant messaging.

4.   Upon information and belief, BeeTalk is a private limited Singapore company having a principal place of business at 1 Fusionopolis Place #17-10, Galaxis, Singapore 138522.

BeeTalk may be served with process in accordance with the provisions of The Hague Service Convention.

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, BeeTalk 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.   BeeTalk 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. 8,724,622)

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

9.   Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 8,724,622 ("the '622 Patent"), entitled SYSTEM AND METHOD FOR INSTANT VOIP MESSAGING that issued on May 13, 2014. A true and correct copy of the '622 Patent is attached as Exhibit A hereto.

10.   Uniloc USA is the exclusive licensee of the '622 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 identifies the BeeTalk app:

12.   Upon information and belief, the following describes, at least in part, the BeeTalk app:

Description

Join interesting communities through Club and Forum.

Forum
Forum is a great place for you to share and discuss on a variety of interesting and hot topics. Learn new things, interact with cool people.

Club
Club allows you to be in a group filled with people with your same interests. You can join clubs or create your own club.

Look Around
Get to know all the awesome people around you and befriend with them.

Radar
Radar is an advanced search feature that allows you to find even more friends.

Whisper
Whisper is a unique messaging option that makes your sent messages magically disappeared after being read by recipient.
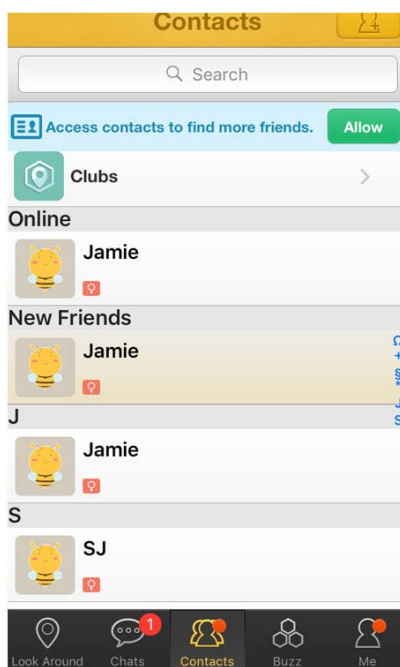
Free Calls and Messages
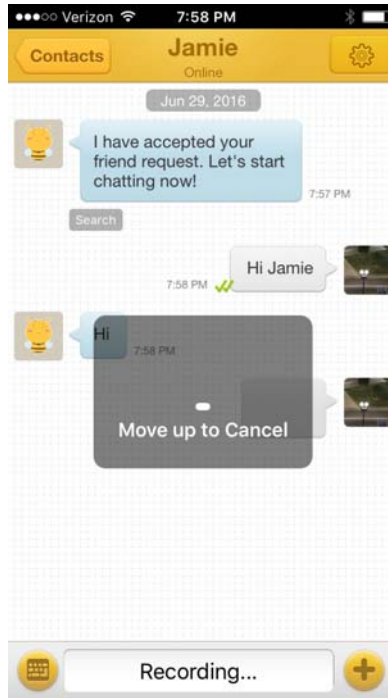Unlimited talk time, texts and voice messages

13.   Upon information and belief, the following describes, at least in part, the BeeTalk app:

14.   Upon information and belief, the following describes, at least in part, how the BeeTalk app works:

15.   Upon information and belief, the following describes, at least in part, how the BeeTalk app works:

16.   Upon information and belief, the following describes, at least in part, how the

BeeTalk app works:

17.   Upon information and belief, the following describes, at least in part, how the

BeeTalk app works:

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