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-741
Plaintiffs,	§	
v.	§	PATENT CASE
ADP, LLC,	§	
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, ADP, LLC ("ADP"), 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, ADP is a Delaware corporation having a principal place of business in Roseland, New Jersey and offering its products, including those accused

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herein of infringement, to customers and/or potential customers located in Texas and in the judicial Eastern District of Texas. ADP may be served with process through its registered agent in Texas: CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

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, ADP 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. ADP 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 Austin, Dallas, El Paso, Houston and San Antonio, 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. 6,324,578)

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

9. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 6,324,578 ("the '578 Patent"), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR MANAGEMENT OF CONFIGURABLE APPLICATION PROGRAMS ON

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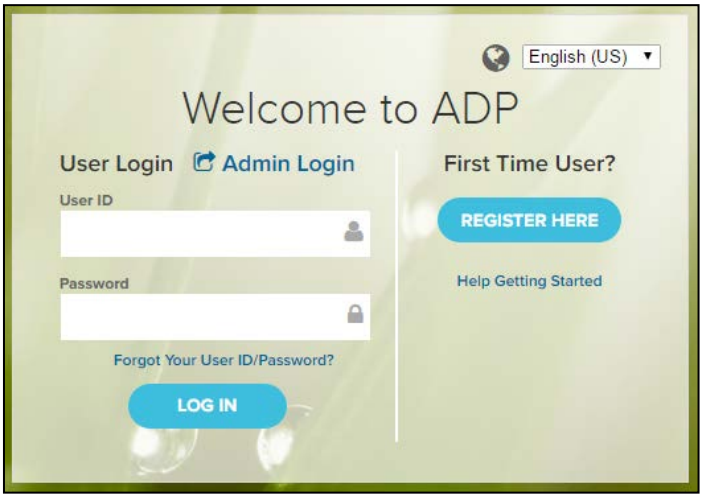
A NETWORK that issued on November 27, 2001. A true and correct copy of the '578 Patent is attached as Exhibit A hereto.

10. Uniloc USA is the exclusive licensee of the '578 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 ADP's portal works:



12. Upon information and belief, the following describes, at least in part, how the ADP portal works:

Activation
If you already have a User ID and Password for ADP Workforce Now, iPayStatements, ADP Employee Self Service, ADP TotalSource, or ADP Resource to access your information on the web, you can use the same User ID and Password to log in to ADP Mobile Solutions. If you don't, please go to New User Registration on your desktop browser to create a new User ID.

Eligibility Requirements
The ADP© Mobile Solutions app is available to employees of ADP clients in the US using these select ADP Services. The select ADP services that work with ADP Mobile Solutions are iPay Statements, Workforce Now 2.0 and higher for mid-sized companies, and specific versions of Portal Self Service for large clients including Vantage and Enterprise HR. Small businesses using ADP's online payroll management solution, RUN Powered by ADP®, as well as those utilizing the comprehensive Human Resources outsourcing solution, ADP TotalSource®, will also be able to deploy the ADP Mobile Solutions app. Each employee must already have an ADP User ID and password.

13. Upon information and belief, the following describes, at least in part, how the ADP portal works:

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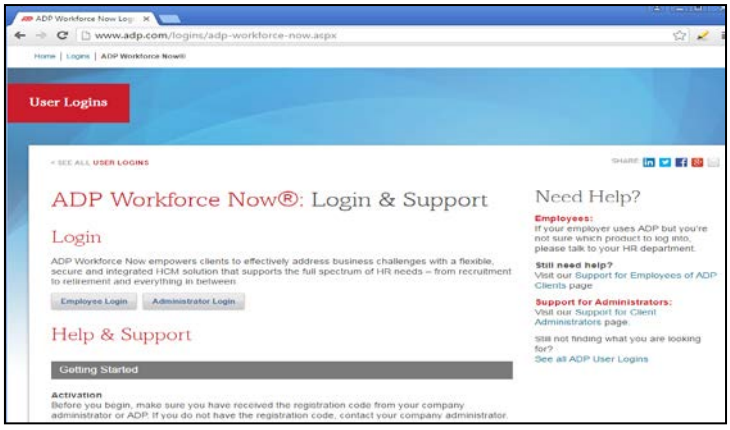
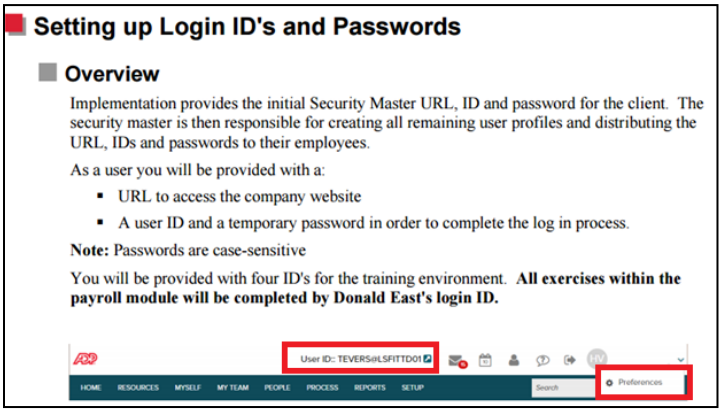
14. Upon information and belief, the following describes, at least in part, how the ADP portal works:



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



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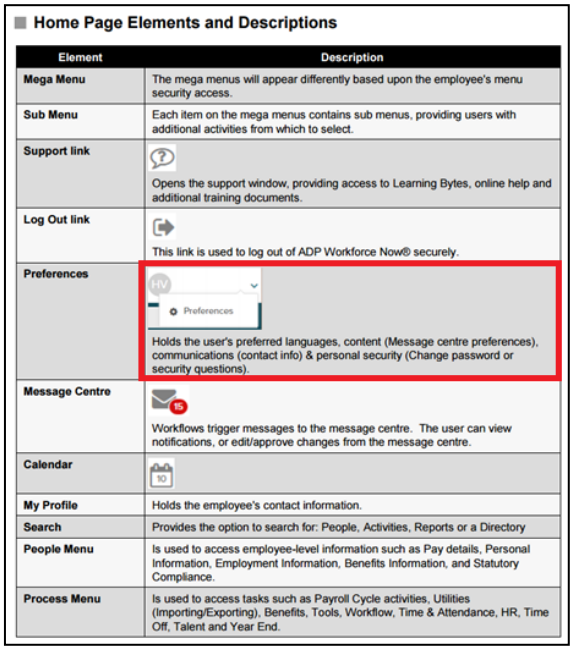
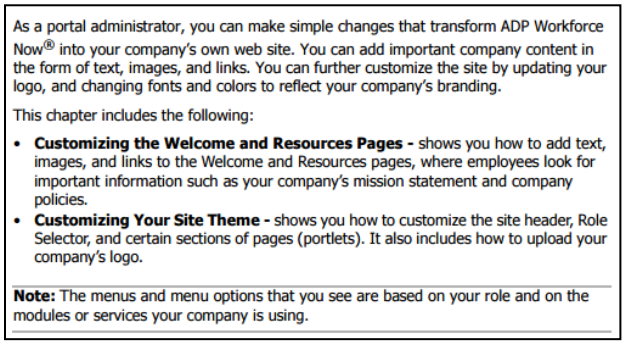
16. Upon information and belief, the following describes, at least in part, how the ADP portal works:



Home Page Elements and Descriptions

Element	Description
Mega Menu	The mega menus will appear differently based upon the employee's menu security access.
Sub Menu	Each item on the mega menus contains sub menus, providing users with additional activities from which to select.
Support link	Opens the support window, providing access to Learning Bytes, online help and additional training documents.
Log Out link	This link is used to log out of ADP Workforce Now® securely.
Preferences	Preferences Holds the user's preferred languages, content (Message centre preferences), communications (contact info) & personal security (Change password or security questions).
Message Centre	Workflows trigger messages to the message centre. The user can view notifications, or edit/approve changes from the message centre.
Calendar	
My Profile	Holds the employee's contact information.
Search	Provides the option to search for: People, Activities, Reports or a Directory
People Menu	Is used to access employee-level information such as Pay details, Personal Information, Employment Information, Benefits Information, and Statutory Compliance.
Process Menu	Is used to access tasks such as Payroll Cycle activities, Utilities (Importing/Exporting), Benefits, Tools, Workflow, Time & Attendance, HR, Time Off, Talent and Year End.

17. Upon information and belief, the following describes, at least in part, how the ADP portal works:



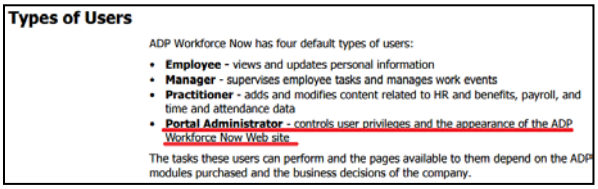
As a portal administrator, you can make simple changes that transform ADP Workforce Now® into your company's own web site. You can add important company content in the form of text, images, and links. You can further customize the site by updating your logo, and changing fonts and colors to reflect your company's branding.

This chapter includes the following:

- **Customizing the Welcome and Resources Pages -** shows you how to add text, images, and links to the Welcome and Resources pages, where employees look for important information such as your company's mission statement and company policies.
- **Customizing Your Site Theme -** shows you how to customize the site header, Role Selector, and certain sections of pages (portlets). It also includes how to upload your company's logo.

Note: The menus and menu options that you see are based on your role and on the modules or services your company is using.

18. Upon information and belief, the following describes, at least in part, how the ADP portal works:



Types of Users

ADP Workforce Now has four default types of users:

- **Employee -** views and updates personal information
- **Manager** - supervises employee tasks and manages work events
- **Practitioner -** adds and modifies content related to HR and benefits, payroll, and time and attendance data
- **Portal Administrator** - controls user privileges and the appearance of the ADP Workforce Now Web site

The tasks these users can perform and the pages available to them depend on the ADP modules purchased and the business decisions of the company.

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