

**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-871
	§	
Plaintiffs,	§	
	§	
v.	§	PATENT CASE
	§	
KASPERSKY LAB, INC.	§	
	§	
Defendant.	§	JURY TRIAL DEMANDED

**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

1. Plaintiffs, Uniloc USA, Inc. and Uniloc Luxembourg, S.A. (together “Uniloc”), as and for their complaint against defendant, Kaspersky Lab, Inc. (“Defendant”), allege as follows:

**THE PARTIES**

2. 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.

3. 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). Uniloc Luxembourg owns a number of patents in the field of application management in a computer network.

4. Upon information and belief, Kaspersky Lab, Inc. is a Massachusetts corporation having a place of business at 500 Unicorn Park, 3rd Floor, Woburn, Massachusetts 01801 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. Kaspersky Lab, Inc. may be served with process through its registered agent: Angelo Gentile, 500 Unicorn Park Dr., Woburn, MA 01801.

**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, Defendant 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. Defendant 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. 6,510,466)

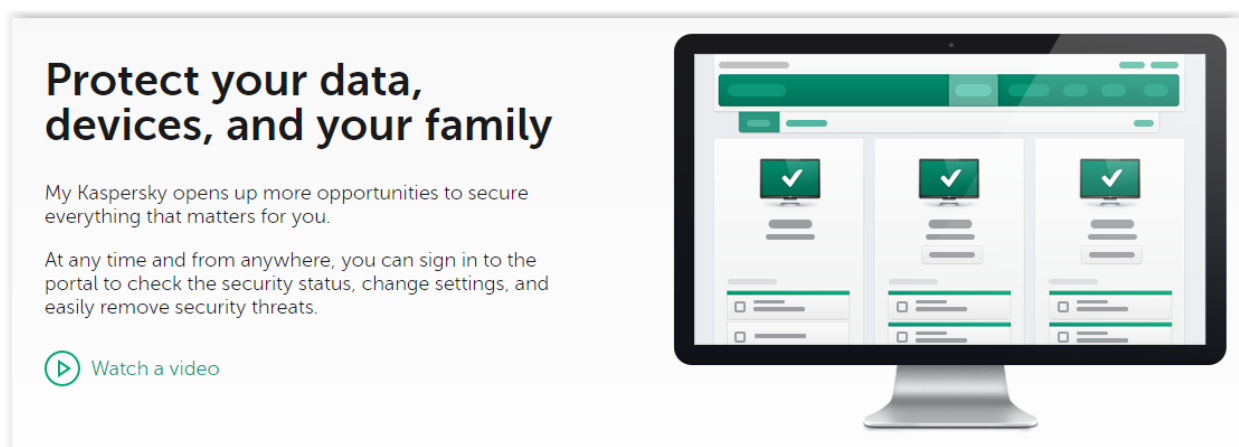
8. Uniloc incorporates by reference the preceding paragraphs.

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.

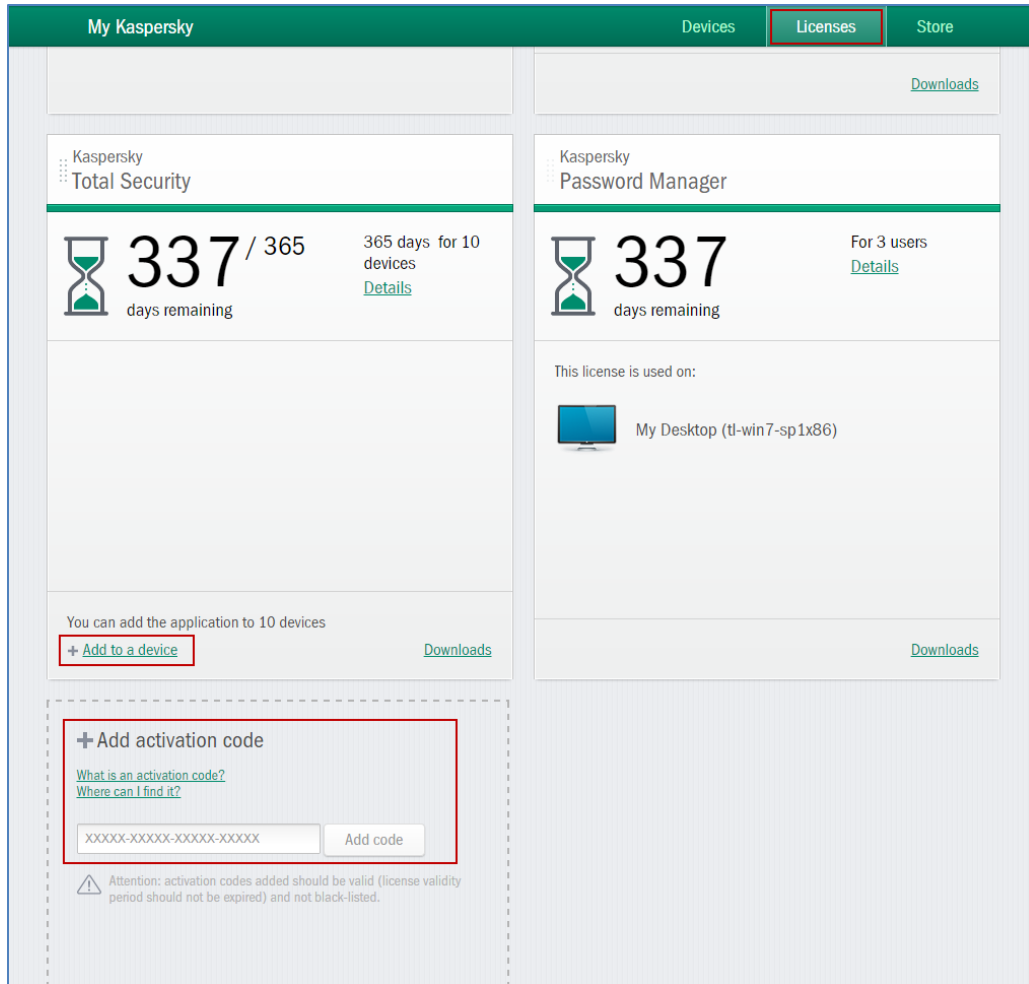
11. The '466 Patent has been referenced by over four hundred other patent applications/patents including patents applications/patents by IBM, HP, Network Associates, Microsoft, Fujitsu, Alcatel, SAP, AT&T, Citrix, Sharp, Computer Associates, Oracle, Google, and Intel.

12. Upon information and belief, the following describes, at least in part, how certain aspects of a representative sample of Defendant's software licensing and delivery system work:



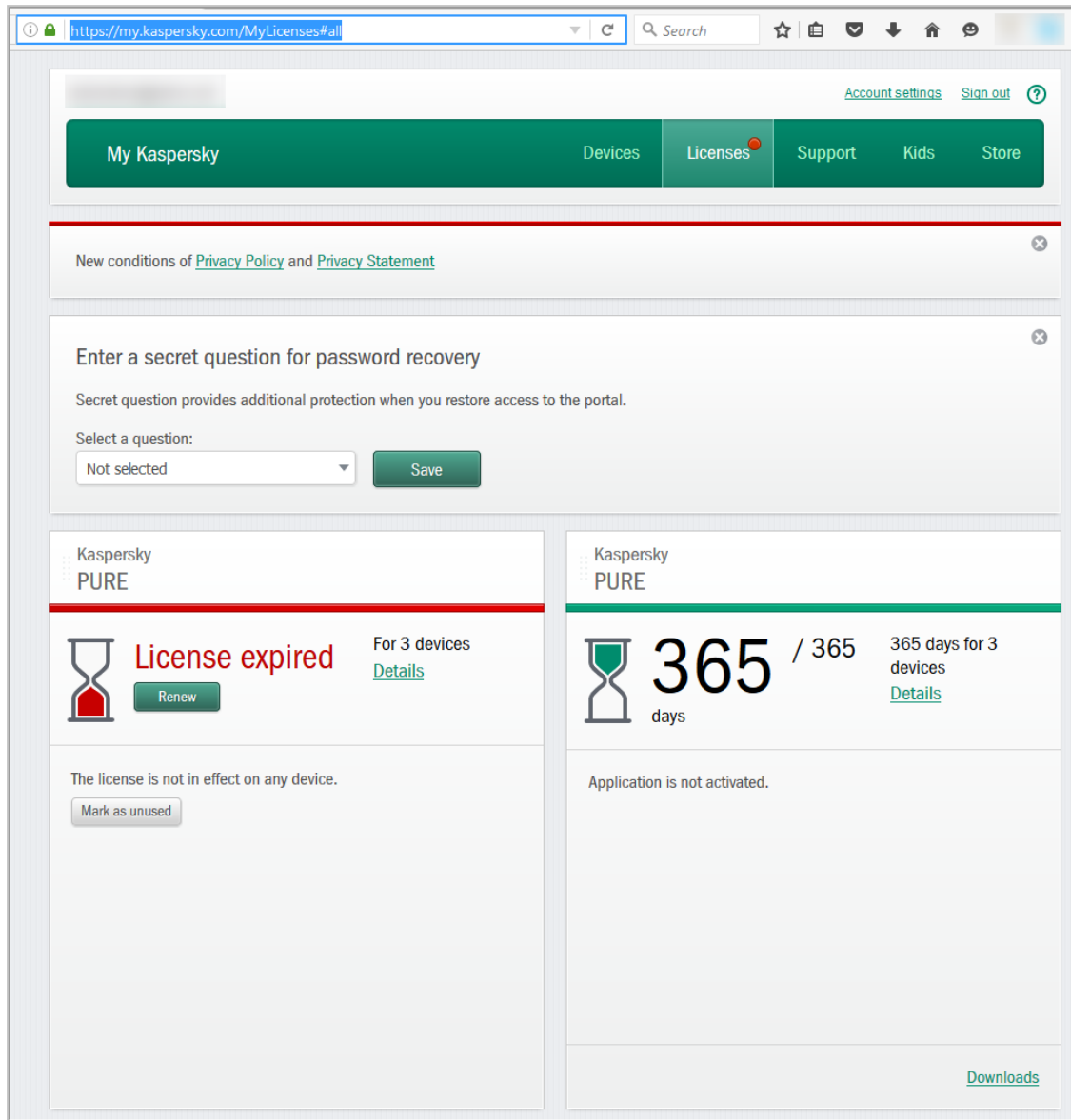
Source: <https://my.kaspersky.com>

13. Upon information and belief, the following describes, at least in part, how certain aspects of a representative sample of Defendant's software licensing and delivery system work:



Source: <https://blog.kaspersky.com/my-kaspersky-tip-of-the-week/7131/>

14. Upon information and belief, the following describes, at least in part, how certain aspects of a representative sample of Defendant's software licensing and delivery system work:



15. Upon information and belief, the following describes, at least in part, how certain aspects of a representative sample of Defendant's software licensing and delivery system work:

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