**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

AGIS SOFTWARE DEVELOPMENT LLC,	§ § §	Case No.
Plaintiff,	§ §	**JURY TRIAL DEMANDED**
v.	§ § §	
UBER TECHNOLOGIES INC., d/b/a UBER,	§ § §	
Defendant.	§ §	

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, AGIS Software Development LLC ("AGIS Software" or "Plaintiff") files this original Complaint against Defendant Uber Technologies Inc., d/b/a Uber ("Uber" or "Defendant") for patent infringement under 35 U.S.C. § 271 and alleges as follows:

THE PARTIES

1.   Plaintiff AGIS Software is a limited liability company organized and existing under the laws of the State of Texas and maintains its principal place of business at 100 W. Houston Street, Marshall, Texas 75670. AGIS Software is the owner of all right, title, and interest in and to U.S. Patent Nos. 7,031,728, 7,630,724, 8,213,970, 10,299,100, 10,341,838 and (the "Patents-in-Suit").

2.   Defendant Uber is a Delaware corporation and maintains its principal place of business at 1455 Market Street, #400, San Francisco, California 94103, and may be served with process via its registered agent, Corporation Service Company at 251 Little Falls Drive, Wilmington, Delaware 19808. Upon information and belief, Uber does business in Texas, directly or through intermediaries, and offers its products and/or services, including those

accused herein of infringement, to customers and potential customers located in Texas, including in the judicial Eastern District of Texas.

JURISDICTION AND VENUE

3.   This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq*. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1338(a), and 1367.

4.   This Court has personal jurisdiction over Uber in this action because Uber has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Uber would not offend traditional notions of fair play and substantial justice. Uber conducts business and has committed acts of patent infringement and/or has induced acts of patent infringement by others in this Judicial District and/or has contributed to patent infringement by others in this Judicial District, the State of Texas, and elsewhere in the United States by, among other things, offering to sell and selling products and/or services that infringe the Patents-in-Suit.

5.   Venue is proper in this Judicial District pursuant to 28 U.S.C. §§ 1391 and 1400(b). Uber is registered to do business in Texas and, upon information and belief, Uber has transacted business in the Eastern District of Texas, and has committed acts of direct and indirect infringement in the Eastern District of Texas.
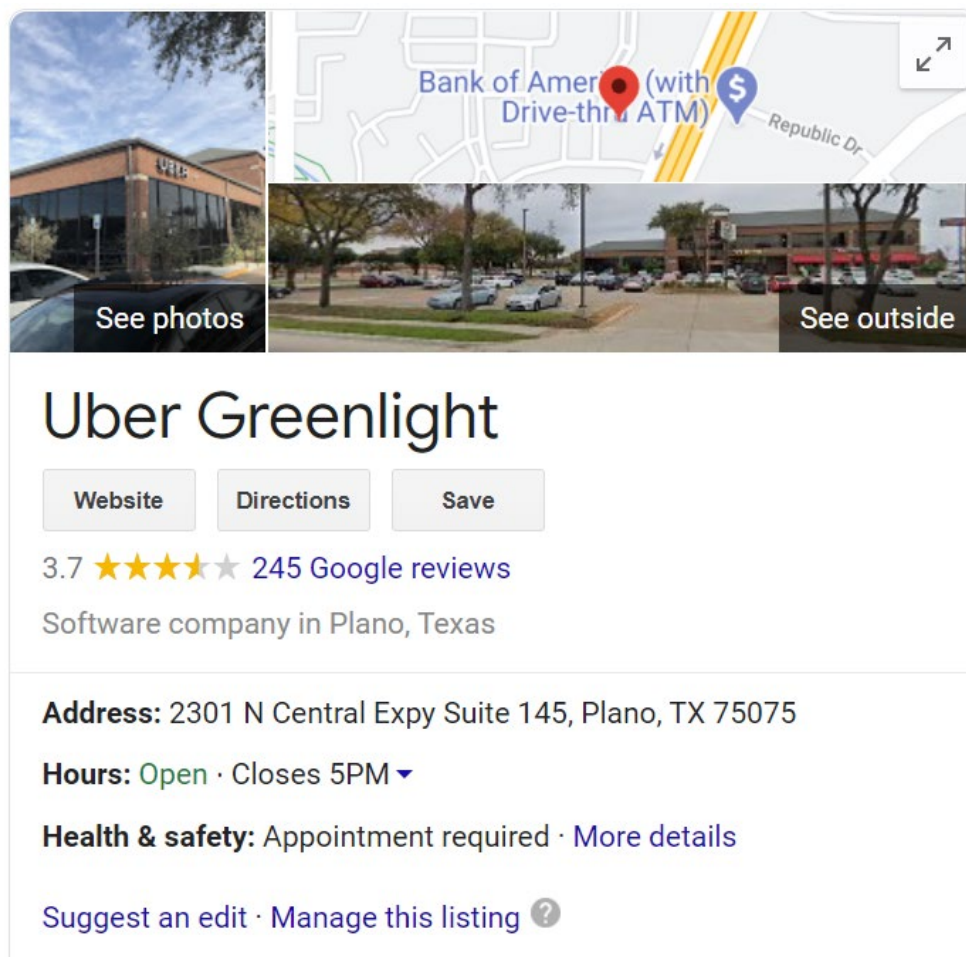
Uber Greenlight

6.   For example, venue is proper because Uber maintains a regular and established place of business in this District with an Uber Greenlight Hub at 2301 North Central Expressway, Suite 145, Plano, Texas 75075. The Greenlight Hub at this location is a physical

location of Uber in this District, from which Uber's employees and/or agents conduct its

business:

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7.   Upon information and belief, the Uber Greenlight Hub at 2301 North Central Expressway, Suite 145, Plano, Texas 75075 has continued to operate throughout the duration of the COVID-19 pandemic, either regularly or by appointment:

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[1] https://www.google.com/maps/place/Uber+Greenlight/@33.0301283,-96.7093791,3a,75y/data=!3m8!1e2!3m6!1sAF1QipOkLpyQMzIEpxtBcxA4O2oatPlBhMu7D0s2hyHz!2e10!3e12!6shttps:%2F%2Flh5.googleusercontent.com%2Fp%2FAF1QipOkLpyQMzIEpxtBcxA4O2oatPlBhMu7D0s2hyHz%3Dw203-h270-k-no!7i3120!8i4160!4m8!1m2!2m1!1suber+greenlight!3m4!1s0x0:0x1a6b77e198ba1b5!8m2!3d33.0308295!4d-96.7095566

[2] https://www.google.com/maps/place/Uber+Greenlight/@33.0301283,-96.7093791,3a,75y,90t/data=!3m8!1e2!3m6!1sAF1QipOWt1SM6YgeiSh34D-52BLbhje5C4mB5bFBJ7ci!2e10!3e12!6shttps:%2F%2Flh5.googleusercontent.com%2Fp%2FAF1QipOWt1SM6YgeiSh34D-52BLbhje5C4mB5bFBJ7ci%3Dw203-h114-k-no!7i4032!8i2268!4m8!1m2!2m1!1suber+greenlight!3m4!1s0x0:0x1a6b77e198ba1b5!8m2!3d33.0308295!4d-96.7095566

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