

2. On information and belief, Defendant Verizon Communications, Inc. (“Verizon Communications”) is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 1095 Avenue of the Americas, New York, New York 10036. On information and belief, Verizon Communications may be served with process through its registered agent at CT Corporation System, 350 North Street, Dallas, Texas 75201.

3. On information and belief, Defendant Cellco Partnership, d/b/a Verizon Wireless (“Verizon Wireless”) is a Delaware partnership, with its principal place of business at One Verizon Way, Basking Ridge, New Jersey 07920. On information and belief, Verizon Wireless is a wholly-owned subsidiary of Verizon Communications.

4. On information and belief, Defendant Verizon Enterprise Solutions, LLC (“Verizon Enterprise”) is a limited liability company organized and existing under the laws of the State of Delaware, with a principal place of business at One Verizon Way, Basking Ridge, New Jersey 07920. Defendant Verizon Enterprise may be served with process through its registered agent at the CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

5. On information and belief, Defendant Verizon Business Global LLC (“Verizon Business Global”) is a limited liability company organized and existing under the laws of the State of Delaware, with a principal place of business at One Verizon Way, Basking Ridge, New Jersey 07920. On information and belief, Defendant Verizon Business Global is a wholly-owned subsidiary of Verizon Communications. Defendant Verizon Business Global may be served with process through its registered agent Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

6. On information and belief, Defendant Verizon Business Network Services, LLC (“Verizon Business Network”) is a limited liability company organized and existing under the laws

of the State of Delaware, with a regular and established place of business in this District at 222 Rotary, San Antonio, Texas 78202. Defendant Verizon Business Network may be served with process through its registered agent at CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

7. On information and belief, Defendant Terremark North America LLC (“Terremark”) is a limited liability company, organized and existing under the laws of the State of Florida, with a principal place of business at One Verizon Way, Basking Ridge, New Jersey 07920. Defendant Terremark may be served with process through its registered at the CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

8. Verizon is doing business, either directly or through its agents, on an ongoing basis in this Judicial District and elsewhere in the United State, and has regular and established places of business in this Judicial District including, but not limited to: 1006 East End Boulevard North, Suite A, Marshall, Texas 75670; 1111 East Grand Avenue, Marshall, Texas 75670; 741 North Central Expressway, Plano, Texas 75075; 2330 Preston Road, Suite 500, Frisco, Texas 75034; 3220 East Hebron Parkway, Suite 114, Carrollton, Texas 75010; 5020 State Highway 121, The Colony, Texas 75056; 204 Central Expressway South, Suite 40, Allen, Texas 75013; and 500 East Loop 281, Longview, Texas 75605.

9. On information and belief, Verizon Communications operates as a multinational telecommunications conglomerate composed currently and primarily of two segments, Wireless and Wireline.¹ On information and belief, Verizon Wireless comprises the Wireless segment.²

¹ <https://www.sec.gov/Archives/edgar/data/732712/000119312514073266/d622994d10k.htm>

² *Id.*

On information and belief, Verizon Business Global, Verizon Business Network, Verizon Enterprise, and Terremark comprise the Wireline segment.³

10. On information and belief, Verizon Enterprise, Verizon Business Global, Verizon Business Network, and Terremark are direct or indirect subsidiaries of Verizon Communications, Inc. On information and belief, Verizon Communications Inc. and/or its employees or officers direct and/or control the actions of these entities. On information and belief, Verizon Communications Inc. and/or its employees or officers direct and/or control the actions of these entities by, for example, inducing and contributing to the actions complained of herein.

JURISDICTION AND VENUE

11. 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.

12. This Court has specific and personal jurisdiction over Defendants consistent with the requirements of the Due Process Clause of the United States Constitution and the Texas Long Arm Statute. On information and belief, Defendants have sufficient minimum contacts with the forum because Defendants transact substantial business in the State of Texas and in this Judicial District. Further, Defendants have, directly or through subsidiaries or intermediaries, committed and continue to commit acts of patent infringement in the State of Texas and in this Judicial District as alleged in this Complaint, as alleged more particularly below.

13. Venue is proper in this Judicial District pursuant to 28 U.S.C. §§ 1391 and 1400(b) because Defendants are subject to personal jurisdiction in this Judicial District, have committed acts of patent infringement in this Judicial District, and have regular and established places of

³ *Id.*

business in this Judicial District. Defendants, through their own acts and/or through the acts of others, make, use, sell, and/or offer to sell infringing products within this Judicial District, regularly do and solicit business in this Judicial District, and have the requisite minimum contacts with the Judicial District, such that this venue is a fair and reasonable one. Further, on information and belief, Defendants have admitted or not contested proper venue in this Judicial District in other patent infringement actions.

PATENTS-IN-SUIT

14. On July 3, 2012, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,213,970 (the “’970 Patent”) entitled “Method of Utilizing Forced Alerts for Interactive Remote Communications.” On September 1, 2021, the United States Patent and Trademark Office issued an *Inter Partes* Review Certificate for the ’970 Patent cancelling claims 1 and 3-9. On December 9, 2021, the United States Patent and Trademark Office issued an *Ex Parte* Reexamination Certificate for the ’970 Patent determining claims 2 and 10 (as amended) and claims 11-13 to be valid and patentable. A true and correct copy of the ’970 Patent, which includes the September 1, 2021 *Inter Partes* Review Certificate and the December 9, 2021 *Ex Parte* Reexamination Certificate, is attached hereto as **Exhibit A**.

15. On October 11, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,467,838 (the “’838 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” On May 27, 2021, the United States Patent and Trademark Office issued an *Ex Parte* Reexamination Certificate for the ’838 Patent confirming the validity and patentability of claims 1-84. A true and correct copy of the ’838 Patent, which includes the May 27, 2021 *Ex Parte* Reexamination Certificate, is attached hereto as **Exhibit B**.

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