

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

BELL NORTHERN RESEARCH, LLC,

Plaintiff,

v.

AT&T INC., AT&T CORP., AT&T
MOBILITY, LLC, AT&T SERVICES,
INC., CRICKET WIRELESS LLC, and
EMBLEM SOLUTIONS LLC

Defendants.

Civil Action No. 4:23-cv-789

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Bell Northern Research, LLC (“BNR” or “Plaintiff”), for its Complaint against Defendant AT&T Inc., (“AT&T Inc.” or “Defendant”), Defendant AT&T Corp., (“AT&T Corp.” or “Defendant”), Defendant AT&T Mobility, LLC, (“AT&T Mobility” or “Defendant”), Defendant AT&T Services Inc., (“AT&T Services” or “Defendant”), Cricket Wireless LLC (“Cricket” or “Defendant”), and Emblem Solutions (“Emblem” or “Defendant”) (individually each a “Defendant” and collectively “Defendants”) for infringement of U.S. Patent Nos. 8,204,554, 7,319,889, RE 48,629, 8,416,862, 7,564,914, 7,957,450, 6,941,156, 6,696,941, 7,039,435, 6,963,129, 6,858,930, 8,396,072, and 8,792,432 (the “Asserted Patents”) alleges the following:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

THE PARTIES

2. Plaintiff BNR is a limited liability company organized under the laws of the State of Delaware with a place of business at 401 N. Michigan Ave., Suite 1630, Chicago, IL 60611.

3. On information and belief, Defendant AT&T Inc. is a Delaware corporation with its principal place of business at 208 S. Akard Street, Dallas, Texas, 75202. AT&T Inc.'s registered agent for service is CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201. Upon information and belief, AT&T Inc. sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services that into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this judicial district and elsewhere in the United States.

4. On information and belief, Defendant AT&T Corp. is a New York corporation with a principal place of business at One AT&T Way, Bedminster, New Jersey 07921-0752. AT&T Corp.'s registered agent for service is CT Corporation System, 28 Liberty Street, New York, New York, 10005. Upon information and belief, AT&T Corp. sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services that into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this judicial district and elsewhere in the United States.

5. On information and belief, Defendant AT&T Mobility is a Delaware limited liability company with its principal place of business at 5565 Glenridge Connector, Atlanta, Georgia 30349. AT&T Mobility LLC's registered agent for service is The Corporation Trust Company, located at Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801. Upon information and belief, AT&T Mobility sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services that into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this judicial district and elsewhere in the United States.

6. On information and belief, Defendant AT&T Services is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 208 South

Akard Street, Dallas, Texas 75202. AT&T Services, Inc.'s registered agent for service is CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. Upon information and belief, AT&T Services sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services that into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this judicial district and elsewhere in the United States.

7. Upon information and belief, Cricket is a limited liability company organized and existing under the laws of Delaware that maintains its principal place of business at 575 Morosgo Dr NE, Atlanta, GA 30324. Cricket has as its registered agent for service: The Corporation Trust Company, located at Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801. Upon information and belief, Cricket sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services that into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this judicial district and elsewhere in the United States.

8. Upon information and belief, Emblem Solutions LLC is a limited liability company organized and existing under the laws of Delaware that maintains its principal place of business at 2200 Century Parkway NE, Ste 250, Atlanta, GA 30345. Emblem has as its registered agent for service: The Corporation Trust Company, located at Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801. Upon information and belief, Emblem sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services that into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this judicial district and elsewhere in the United States.

JURISDICTION AND VENUE

9. This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 of the United States Code.

10. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

11. Venue is proper in this judicial district under 28 U.S.C. §1400(b).

12. On information and belief, AT&T Inc. has committed acts of infringement in this District and has a regular and established places of business within this District at 208 S. Akard Street, Dallas, Texas, 75202, as well as at multitude of retail stores. *See e.g.*, <https://www.att.com/stores/texas/plano> (showing 5 AT&T stores located in Plano, Texas).

13. On information and belief, AT&T Corp. has committed acts of infringement in this District.

14. On information and belief, AT&T Mobility has committed acts of infringement in this District.

15. On information and belief, AT&T Services has committed acts of infringement in this District.

16. On information and belief, Cricket has committed acts of infringement in this District and has regular and established places of business within this District at 1405 Jupiter Road, Plano, TX 75074, and at 2400 K Ave, Ste F, Plano, TX 75074.

17. On information and belief, Emblem has committed acts of infringement in this District.

18. On information and belief, each Defendant is subject to this Court's general and specific personal jurisdiction because each Defendant has sufficient minimum contacts within the State of Texas and this District, pursuant to due process and/or the Texas Long Arm Statute because each Defendant purposefully availed itself of the privileges of conducting business in the

State of Texas and in this District, because each Defendant regularly conducts and solicits business within the State of Texas and within this District, and because Plaintiff's causes of action arise directly from each of Defendant's business contacts and other activities in the State of Texas and this District.

19. This Court has personal jurisdiction over AT&T Inc. in this action because AT&T Inc. has committed acts of infringement within this District giving rise to this action, has a regular and established place of business in this District, and has established minimum contacts with this forum such that the exercise of jurisdiction over AT&T Inc. would not offend traditional notions of fair play and substantial justice. AT&T Inc., directly and/or through subsidiaries or intermediaries, conducts its business extensively throughout Texas, by shipping, distributing, offering for sale, selling, and advertising its products and/or services in the State of Texas and the Eastern District of Texas, regularly does business or solicits business, engages in other persistent courses of conduct, and/or derives substantial revenue from products and/or services provided to individuals in the State of Texas, and commits acts of infringement of Plaintiff's patents in this District by, among other things, making, using, importing, offering to sell, and selling products and/or services that infringe the asserted patents, including without limitation the tablets and phones accused of infringement in this case and cellular services offered by AT&T Inc. on its network.

20. AT&T Inc., directly and/or through subsidiaries or intermediaries, has purposefully and voluntarily placed one or more products and/or services in the stream of commerce that practice the Asserted Patents with the intention and expectation that they will be purchased and used by consumers in the Eastern District of Texas. These products and/or services have been and continue to be purchased and used in the Eastern District of Texas. *See e.g.*, <https://www.att.com/stores/texas/plano> (showing 5 AT&T stores located in Plano, Texas).

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