

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**JAWBONE INNOVATIONS, LLC,**

**Plaintiff,**

**v.**

**APPLE INC.,**

**Defendant.**

**Case No. 6:21-CV-00984-ADA**

**PATENT CASE**

**JURY TRIAL DEMANDED**

**[REDACTED]**

**PUBLIC VERSION**

**DEFENDANT APPLE INC.'S MOTION TO  
TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

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## **I. INTRODUCTION**

This case should be transferred to the Northern District of California (“NDCA”), where Apple is headquartered, where most of its likely witnesses are located, where the accused technology was developed, and where most of the named inventors on the Asserted Patents are located. This case has no meaningful connection to the Western District of Texas (“WDTX”). No material witnesses are located in Texas. Nor is Apple aware of any relevant documents located in Texas. While Apple maintains offices in WDTX, the groups at Apple that designed and developed the accused functionality are not located in Texas, and Apple is not aware of any employees located there who were involved in any issues implicated in this case. By any measure, NDCA is the clearly more convenient venue, and this case should be transferred for the convenience of the parties and witnesses, and in the interest of justice. For these reasons and those discussed below, Apple respectfully requests that the Court transfer this case to NDCA pursuant to 28 U.S.C. § 1404(a). Apple and Jawbone have conferred on this Motion pursuant to Local Rule CV-7(g). Jawbone opposes this Motion.

## **II. STATEMENT OF FACTS**

### **A. Nature of this Case**

Jawbone Innovations filed this suit against Apple on September 23, 2021, and filed an Amended Complaint on December 23, 2021. Jawbone Innovations accuses Apple of infringing U.S. Patent Nos. 7,246,058, 8,019,091, 8,280,072, 8,321,213, 8,326,611, 8,467,543, 10,779,080, 11,122,357, and 8,503,691 (the “Asserted Patents.”). Am. Compl. ¶¶ 9-18. Jawbone Innovations accuses of infringement nearly all versions of the Apple iPhone, AirPods, HomePod, Beats, MacBook, and iMac (the “Accused Products”). Ex. A (Infringement Contentions). In particular,

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