



Mary Ave., Suite 200, Sunnyvale, CA 94085. In some circumstances, Good Technology competes with AirWatch.

**JURISDICTION, VENUE, AND INTRADISTRICT ASSIGNMENT**

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

6. This Court has personal jurisdiction over Good Technology because Good Technology has conducted and conducts business in this District, has committed and continues to commit acts of patent infringement in this District, and has harmed and continues to harm AirWatch by making or using infringing products and services in this District and by inducing and contributing to its customers' infringement in this District.

7. Venue is proper within this District under 28 U.S.C. §§ 1391(b) and (c) because Good Technology transacts business and sells and offers for sale within this District products and services that practice the asserted AirWatch patent. Assignment to the Atlanta Division is proper because AirWatch has its principal place of business in Atlanta, Georgia.

**THE PATENT IN SUIT**

8. U.S. Patent No. 8,826,432 ("the '432 patent"), entitled "Systems and Methods for Controlling Email Access," was lawfully issued by the United States Patent and Trademark Office ("PTO") on September 2, 2014. The '432 patent issued from U.S. Patent Application Serial No. 13/723,526, filed on December 21, 2012. A copy of the '432 patent is attached as Exhibit A.

9. The '432 patent was assigned to AirWatch, and AirWatch holds the entire right, title, and interest in the '432 patent.

## COUNT ONE

### **(Infringement of U.S. Patent No. 8,826,432)**

10. AirWatch incorporates and realleges paragraphs 1 through 9 of this Complaint.

11. Upon information and belief, Good Technology has infringed and continues to infringe one or more claims of the '432 patent in violation of 35 U.S.C. § 271(a). Good Technology's acts of infringement include direct infringement by making or using products and services having URL-access technologies covered by one or more claims of the '432 patent in the United States. The infringing products and services (collectively, "Accused Products") include, without limitation, Good for Enterprise, Good Access, Good Dynamics, and Good Network Operations Center (NOC).

12. Good Technology's acts of infringement further include inducement of infringement of the '432 patent, in violation of 35 U.S.C. § 271(b). Good Technology has induced and continues to induce its customers to install, configure, and use the Accused Products in the United States so as to infringe the '432 patent. Good Technology's acts of inducement include selling or otherwise distributing the Accused Products in the United States (directly or through intermediaries). Good Technology's acts of inducement further include providing to customers in the United States instructions and promotional materials, including but not limited to website pages and administrator and user guides, for the installation, configuration, and use of the Accused Products. As a consequence of Good Technology's aforementioned acts of inducement, its customers have been induced and continue to be induced to infringe the '432 patent by installing, configuring, and using the Accused Products.

13. Good Technology has had knowledge of the '432 patent at least since the filing of AirWatch's initial complaint on October 14, 2014. Since at least October 14, 2014, Good Technology has known that the Accused Products infringe the '432 patent. Furthermore, since at least October 14, 2014, Good Technology has specifically intended to induce its customers to install, configure, and use the Accused Products so as to infringe the '432 patent. Indeed, Good Technology's above-referenced acts of inducement have no purpose other than to induce its customers to infringe the '432 patent.

14. Good Technology's acts of infringement further include contributory infringement of the '432 patent, in violation of 35 U.S.C. § 271(c). Good Technology has sold or otherwise distributed in the United States (directly or through intermediaries) the Accused Products to its customers. The Accused Products are components of the systems on which they are installed. The systems on which the Accused Products are installed are both patented machines and apparatus for practicing patented processes. The Accused Products constitute material parts of the patented invention. Good Technology has known that the Accused Products are especially made and adapted for use in the infringement of the '432 patent and that the Accused Products are not staple articles or commodities of commerce suitable for substantial noninfringing use at least since October 14, 2014. Indeed, the only use for the Accused Products is to install and use them so as to infringe the '432 patent.

15. Upon information and belief, Good Technology's acts of infringement further include infringement under 35 U.S.C. § 271(f)(1). Without authority, in and from the United States, Good Technology has supplied and caused to be supplied the Accused Products to customers outside the United States. The Accused Products are substantial portions of the patented invention. The

supply of the Accused Products to customers outside the United States actively induces the customers to install the Accused Products, and Good Technology intends for them to do so. Good Technology has known at least since October 14, 2014, that the installation of the Accused Products would make a system that practices the '432 patent, and thus infringe the patent, if it occurred within the United States.

16. Upon information and belief, Good Technology's acts of infringement further include infringement under 35 U.S.C. § 271(f)(2). Without authority, in and from the United States, Good Technology has supplied and caused to be supplied the Accused Products to customers outside the United States. The Accused Products are components of the patented invention. The Accused Products are especially made and adapted for use in the patented invention and are not staple articles or commodities of commerce suitable for substantial noninfringing use. Good Technology knows that its customers outside the United States will install the Accused Products and intends for them to do so. Furthermore, Good Technology knows that its customers' installation of the Accused Products would infringe the '432 patent if it occurred within the United States.

17. Upon information and belief, Good Technology has committed and continues to commit all of the above acts of infringement despite its lack of a good-faith belief that the claims of the '432 patent are noninfringed, invalid, or unenforceable.

18. Good Technology committed these acts of infringement without license or authorization.

19. As a result of Good Technology's infringement of the '432 patent, AirWatch has suffered damages and will continue to suffer damages.

20. Good Technology will continue to infringe unless this Court enjoins Good Technology and its agents, servants, employees, representatives, and all others acting in active concert with it from infringing the '432 patent.

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, AirWatch hereby demands trial by jury on all issues raised by the Complaint.

**PRAYER FOR RELIEF**

WHEREFORE, AirWatch prays for relief, as follows:

- A. A judgment that Good Technology has infringed and continues to infringe one or more claims of the '432 patent;
- B. An injunction barring Good Technology and its officers, directors, agents, servants, employees, affiliates, attorneys, and all others acting in privity or in concert with it, and its parents, subsidiaries, divisions, successors, and assigns, from further acts of infringement of the '432 patent;
- C. An award of damages adequate to compensate for Good Technology's infringement of the '432 patent, including all pre-judgment and post-judgment interest at the maximum rate permitted by law; and
- D. Any other remedy to which AirWatch may be entitled.

Dated: November 7, 2014

Respectfully submitted,

By: /s/ Susan A. Cahoon  
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**Attorneys for Plaintiff**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2014, I electronically filed the foregoing AMENDED COMPLAINT FOR PATENT INFRINGEMENT with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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