IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

	§	
UNILOC USA, INC., and	§	
UNILOC LUXEMBOURG, S.A.,	§	Civil Action No. 6:15-cv-1009
	§	
Plaintiffs,	§	
	§	PATENT CASE
v.	§	
	§	
ELECTRONIC ARTS INC.,	§	
	§	JURY TRIAL DEMANDED
Defendant.	§	
	§	

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs, Uniloc USA, Inc., and Uniloc Luxembourg, S.A. (together "Uniloc"), as and

for their complaint against defendant, Electronic Arts Inc. ("EA"), allege as follows:

THE PARTIES

1.   Uniloc USA, Inc. ("Uniloc USA") is a Texas corporation having a principal place

of business at Legacy Town Center I, Suite 380, 7160 Dallas Parkway, Plano Texas 75024.

Uniloc also maintains a placed of business at 102 N. College, Suite 603, Tyler, Texas 75702.

2.   Uniloc Luxembourg S.A. ("Uniloc Luxembourg") is a Luxembourg public limited

liability company having a principal place of business at 15, Rue Edward Steichen, 4th Floor, L-

2540, Luxembourg (R.C.S. Luxembourg B159161).

3.   Uniloc has researched, developed, manufactured and licensed information

security technology solutions, platforms and frameworks, including solutions for securing

software applications and digital content. Uniloc Luxembourg has been awarded and owns a

number of patents. Uniloc's technologies enable, for example, software and content publishers

to distribute and sell their valuable technologies securely and with a minimum burden to their

legitimate and authorized end users. Uniloc's technologies are used in several markets,

including property rights management and critical infrastructure security.

4.   Upon information and belief, EA is a Delaware corporation having a principal

place of business at 209 Redwood Shores Parkway, Redwood City, California 94065 and does

business in Texas at 11501 Domain Drive, Austin, Texas and in the judicial Eastern District of

Texas. EA may be served with process through its registered agent, the Corporation Trust

Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.
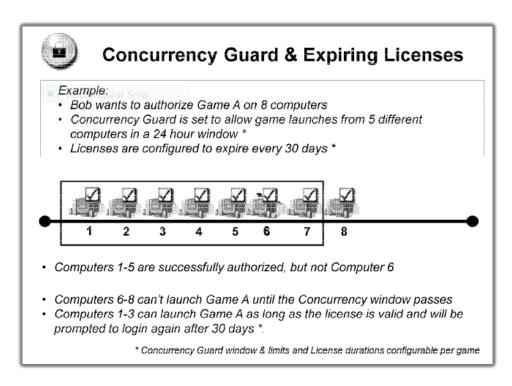
JURISDICTION AND VENUE

5.   Uniloc brings this action for patent infringement under the patent laws of the

United States, 35 U.S.C. § 271 *et seq.* This Court has subject matter jurisdiction pursuant to 28

U.S.C. §§ 1331, 1338(a) and 1367.

6.   Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c) and

1400(b). Upon information and belief, EA is deemed to reside in this judicial district, has

committed acts of infringement in this judicial district, has purposely transacted business

involving the accused products in this judicial district and/or has a regular and established place

of business in this judicial district.

7.   EA is subject to this Court's jurisdiction pursuant to due process and/or the Texas

Long Arm Statute due at least to its substantial business in this State and judicial district,

including: (A) at least part of their past infringing activities, and (B) regularly doing or soliciting

business, engaging in persistent conduct and/or deriving substantial revenue from goods and
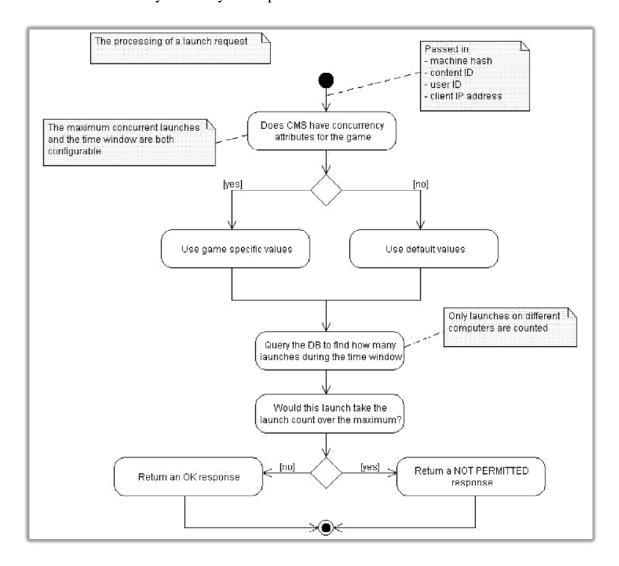
services provided to customers in Texas and maintaining regular and established place of

business at 11501 Domain Drive, Austin, Texas.

COUNT I
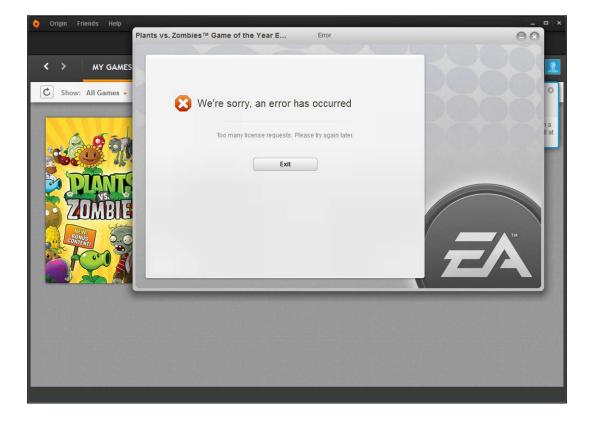### (INFRINGEMENT OF U.S. PATENT NO. 8,566,960)

8.   Uniloc incorporates paragraphs 1-7 above by reference.

9.   Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 8,566,960

("the '960 Patent"), entitled SYSTEM AND METHOD FOR ADJUSTABLE LICENSING OF

DIGITAL PRODUCTS that issued on October 22, 2013. A true and correct copy of the '960

Patent is attached as Exhibit A hereto.

10.   Uniloc USA is the exclusive licensee of the '960 Patent with ownership of all

substantial rights therein, including the right to grant sublicenses, to exclude others, and to

enforce, sue and recover past damages for the infringement thereof.

11.   Upon information and belief, the following describes, at least in part, the EA

Access with Concurrency Guard:

12.   Upon information and belief, the following describes, at least in part, how the EA

Access with Concurrency Guard system operates:

13.   Upon information and belief, the following describes, at least in part, how the EA

Access with Concurrency Guard system operates when too many license requests have been

made:

14.   EA has directly infringed one or more claims of the '960 Patent in this judicial

district and elsewhere in Texas, including at least claim 1, either literally or under the doctrine of

equivalents, by or through making, using, importing, offering for sale and/or selling software that

implements piracy prevention technology including, without limitation, EA Access with

Concurrency Guard.

15.   EA may have infringed the '960 Patent through other software utilizing the same

or reasonably similar activation functionality, including other versions of the EA Access with

Concurrency Guard activation software. Uniloc reserves the right to discover and pursue all

such additional infringing software. For the avoidance of doubt, the EA Access with

Concurrency Guard activation software is identified for exemplary purposes and in no way limits

the discovery and infringement allegations against EA concerning other software that

incorporated the same or reasonably similar activation functionality.

16.   Uniloc has been damaged, reparably and irreparably, by EA's infringement of the '960 Patent and such damage will continue unless and until EA is enjoined.

17.   Uniloc has entered into a Patent License, Release and Settlement Agreement with Flexera Software LLC ("Flexera"). Uniloc is not alleging infringement of the '960 Patent based on any product, software, system, method or service provided by Flexera Software LLC or any Flexera Predecessor ("Flexera Products"). For the purposes of this action, a Flexera Predecessor is any predecessor business owned or controlled by Flexera, including, but not limited to, C-Dilla Limited, GLOBEtrotter Software, Inc., InstallShield Software Corporation, Flexera Holding LLC, Flex co Holding Company, Inc., Flexera Software Inc., Acresso Software Inc., Intraware, Inc., Managesoft Corporation, HONICO Software GmbH, LinkRight Software L.L.C., and Logiknet, Inc. (d/b/a SCCM Expert) and only to the extent of, and limited to, the specific business, technologies and products acquired by Flexera from each of them, and Macrovision Corporation (renamed Rovi Solutions Corporation in July 2009) only to the extent of, and limited to, the specific business, technologies and products acquired by Flexera Holdings Company, Inc. in April 2008 (renamed Acresso Software Inc.), which later changed its name in October 2009 to Flexera Software LLC. For purposes of this action, Flexera Products do not include any third party products or services that provide activation, entitlement, licensing, usage monitoring and management, auditing, or registration functionality or third party products and services that are activated, licensed or registered exclusively and independently of products, software, systems, methods or services provided by Flexera or Flexera Predecessors. All allegations of past infringement against defendant(s) herein are made exclusively and independently of the authorized use of Flexera Products.

PRAYER FOR RELIEF

Uniloc requests that the Court enter judgment against EA as follows:

(A)   that EA has infringed the '960 Patent;

(B)   awarding Uniloc its damages suffered as a result of EA's infringement of the '960

Patent;

(C)   enjoining EA, its officers, directors, agents, servants, affiliates, employees,

divisions, branches, subsidiaries and parents, and all others acting in concert or privity with it

from infringing the '960 Patent;

(D)   awarding Uniloc its costs, attorneys' fees, expenses and interest, and

(E)   granting Uniloc such other and further relief as the Court may deem just and

proper.

DEMAND FOR JURY TRIAL

Uniloc hereby demands trial by jury on all issues so triable pursuant to Fed. R. Civ. P. 38.

Dated: November 20, 2015.   Respectfully submitted,

                                             By: /s/ Craig Tadlock
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