

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

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UNILOC USA, INC. and	§	
UNILOC LUXEMBOURG, S.A.,	§	Civil Action No. 2:16-cv-641-JRG
	§	
Plaintiffs,	§	
	§	
v.	§	PATENT CASE
	§	
LINE EURO-AMERICAS CORP. and	§	
LINE CORPORATION,	§	
	§	
Defendants.	§	JURY TRIAL DEMANDED

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**FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiffs, Uniloc USA, Inc. and Uniloc Luxembourg, S.A. (together “Uniloc”), as and for their First Amended Complaint against defendants, LINE Euro-Americas Corp. and LINE Corporation (together “LINE”), 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 place 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, 4<sup>th</sup> Floor, L-2540, Luxembourg (R.C.S. Luxembourg B159161).
3. Uniloc Luxembourg owns a number of patents in the field of text/voice instant messaging.

4. Upon information and belief, LINE Euro-Americas Corp. is subsidiary of LINE Corp. and a Delaware corporation having a principal place of business at 5750 Wilshire Boulevard, Suite 640, Los Angeles, California 90036. LINE Euro-Americas Corp. may be served with process through its registered agent: Yeong-Sae Kim, 3003 N. 1<sup>st</sup> Street, San Jose, California 95134.

5. Upon information and belief, LINE Corp. is a Japanese corporation having a principal place of business in Tokyo, Japan and offers its products and/or services, including those accused herein of infringement, to customers and/or potential customers located in Texas and in the judicial Eastern District of Texas. LINE Corp. can be served pursuant to service of process provisions of The Hague Convention.

#### **JURISDICTION AND VENUE**

6. 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.

7. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c) and 1400(b). Upon information and belief, LINE is deemed to reside in this judicial district, has committed acts of infringement in this judicial district, and/or has purposely transacted business involving the accused products in this judicial district, including sales to one or more customers in Texas.

8. LINE 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 its past infringing activities, (B) regularly doing or soliciting

business in Texas and/or (C) engaging in persistent conduct and/or deriving substantial revenue from goods and services provided to customers in Texas.

**COUNT I**  
(INFRINGEMENT OF U.S. PATENT NO. 8,724,622)

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

10. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 8,724,622 (“the ’622 Patent”), entitled SYSTEM AND METHOD FOR INSTANT VOIP MESSAGING that issued on May 13, 2014. A true and correct copy of the ’622 Patent is attached as Exhibit A hereto.

11. Uniloc USA is the exclusive licensee of the ’622 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.

12. Upon information and belief, the following identifies, at least in part, LINE’s mobile messenger app:

13. Upon information and belief, the following identifies, at least in part, LINE’s mobile messenger app:

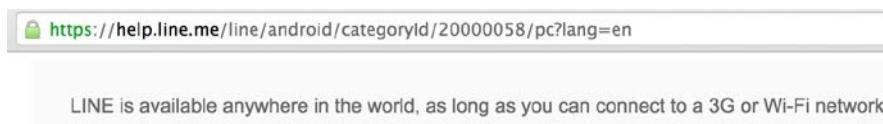


14. Upon information and belief, the following describes, at least in part, LINE’s mobile messenger app:

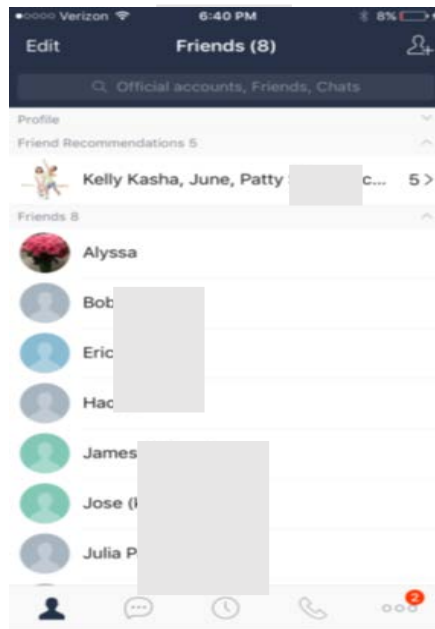
# From Photo and Video Sharing to Voice Messages

LINE lets you share photos, videos, voice messages, contacts, and location information in the moment.

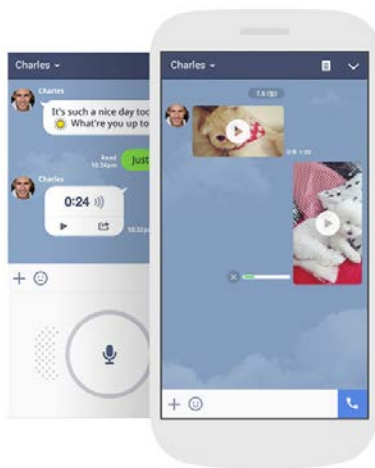
15.



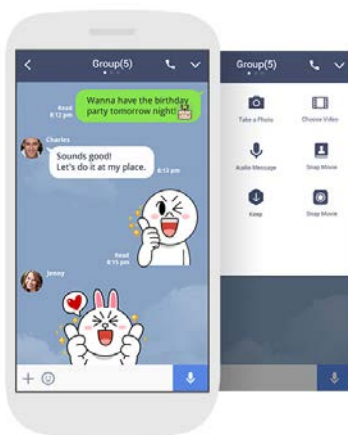
16. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



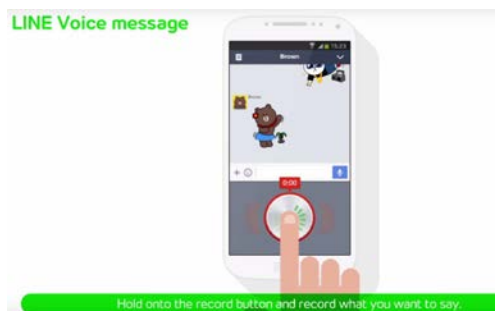
17. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



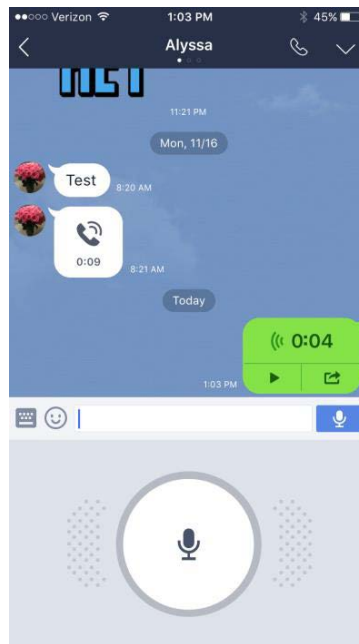
18. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



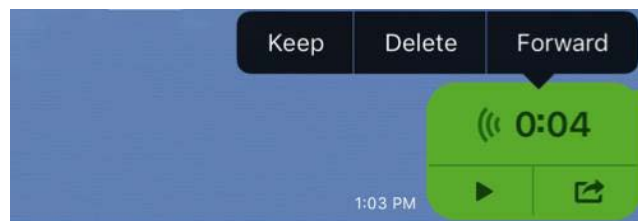
19. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



20. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



21. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



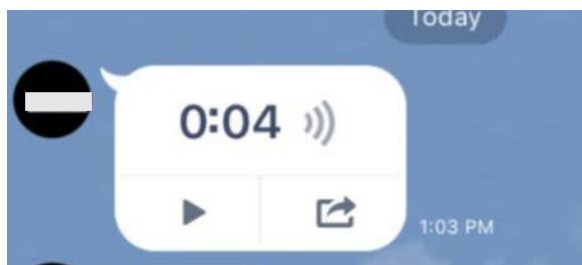
22. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



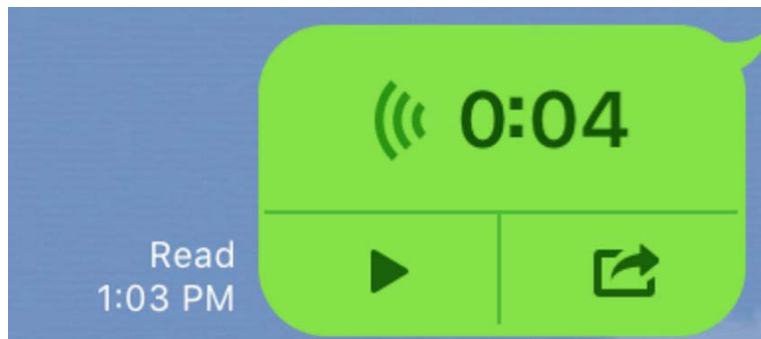
23. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



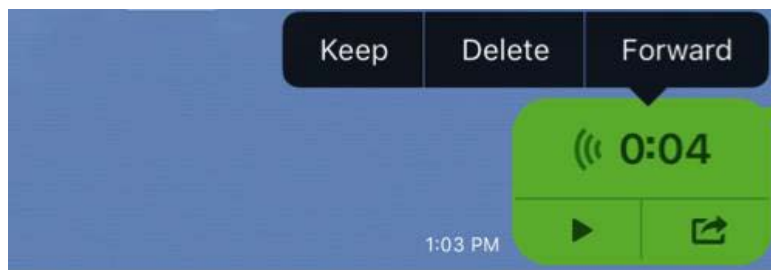
24. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



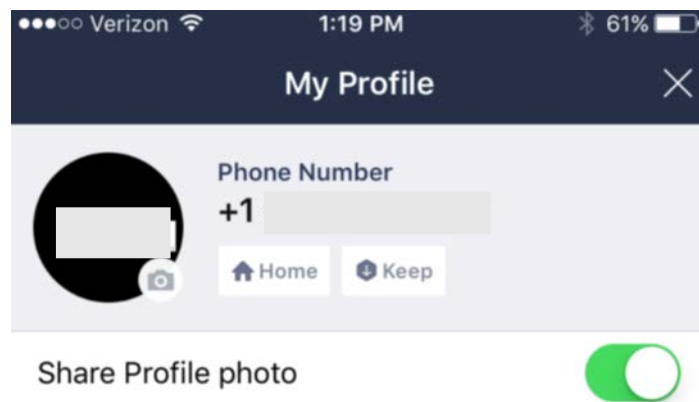
25. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



26. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:

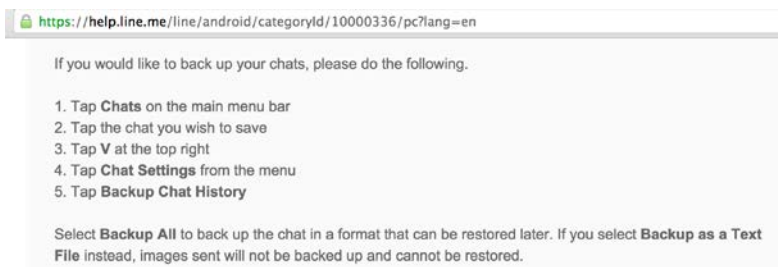


27. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



28. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:





29. Upon information and belief, the following describes, at least in part, how LINE's mobile messenger app works:



30. LINE has directly infringed, and continues to directly infringe one or more claims of the '622 Patent in this judicial district and elsewhere in Texas, including at least Claims 3, 4, 6-8, 10, 11-19, 21-23, 38 and 39 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling the LINE mobile messenger app system running iOS, Android and/or WP8 during the pendency of the '622 Patent which software and associated LINE servers perform instant voice messaging over Wi-Fi and the Internet between persons using cellphones and/or other devices capable of instant voice messaging; wherein digitized audio files are transmitted between a plurality of recipients on a packet switched network and a list of one or more currently potential recipients is displayed on the device.

31. In addition, should LINE's mobile messenger app system be found to not literally infringe the asserted claims of the '622 Patent, LINE's mobile messenger app system would nevertheless infringe the asserted claims of the '622 Patent. More specifically, the accused mobile messenger app system performs substantially the same function (instant voice messaging), in substantially the same way (via a digitized audio files in a client/server

environment), to yield substantially the same result (delivering voice messages to available intended recipients). LINE would thus be liable for direct infringement under the doctrine of equivalents.

32. LINE has indirectly infringed and continues to indirectly infringe at least Claims 3, 4, 6-8, 10, 11-19, 21-23, 38 and 39 of the '622 Patent in this judicial district and elsewhere in the United States by, among other things, actively inducing the using, offering for sale, selling, or importing the mobile messenger app. LINE's customers who purchase the mobile messenger app and operate such application in accordance with LINE's instructions directly infringe one or more of the forgoing claims of the '622 Patent in violation of 35 U.S.C. § 271. LINE directly and indirectly instructs its customers through training videos, demonstrations, brochures, installation and/or user guides, such as those located at the following:

<http://line.me/en>

<https://itunes.apple.com/us/app/line>

<https://play.google.com/store/apps>

[www.youtube.com](http://www.youtube.com)

LINE is thereby liable for infringement of the '622 Patent under 35 U.S.C. § 271(b).

33. LINE has indirectly infringed and continues to indirectly infringe at least Claims 3, 4, 6-8, 10, 11-19, 21-23, 38 and 39 of the '622 Patent in this judicial district and elsewhere in the United States by, among other things, contributing to the direct infringement by others including, without limitation customers using the mobile messenger app, by making, offering to sell, selling and/or importing into the United States, a component of a patented machine, manufacture or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or

especially adapted for use in infringing the '622 Patent and not a staple article or commodity of commerce suitable for substantial non-infringing use.

34. For example, the mobile messenger app is a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patent process. Furthermore, the mobile messenger app is a material part of the claimed inventions and upon information and belief is not a staple article or commodity of commerce suitable for substantial non-infringing use. LINE is, therefore, liable for infringement under 35 U.S.C. § 271(c).

35. LINE will have been on notice of the '622 Patent since, at the latest, the service of this complaint upon LINE. By the time of trial, LINE will have known and intended (since receiving such notice) that its continued actions would actively induce, and contribute to, the infringement of one or more of Claims 3, 4, 6-8, 10, 11-19, 21-23, 38 and 39 of the '622 Patent.

36. LINE may have infringed the '622 Patent through other software utilizing the same or reasonably similar functionality, including other versions of its mobile messenger app system. Uniloc reserves the right to discover and pursue all such additional infringing software/devices.

37. Uniloc has been damaged, reparably and irreparably, by LINE's infringement of the '622 Patent and such damage will continue unless and until LINE is enjoined.

**COUNT II**  
(INFRINGEMENT OF U.S. PATENT NO. 8,995,433)

38. Uniloc incorporates paragraphs 1-37 above by reference.

39. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 8,995,433 ("the '433 Patent"), entitled SYSTEM AND METHOD FOR INSTANT VOIP MESSAGING that issued on March 31, 2015. A true and correct copy of the '433 Patent is attached as Exhibit B hereto.

40. Uniloc USA is the exclusive licensee of the '433 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.

41. LINE has directly infringed, and continues to directly infringe one or more claims of the '433 Patent in this judicial district and elsewhere in Texas, including at least Claims 1-5, 7-12, 14-17 and 25-27 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling the LINE mobile messenger app system running iOS, Android and/or WP8 during the pendency of the '433 Patent which software and associated LINE servers perform instant voice messaging over Wi-Fi and the Internet between persons using cellphones and/or other devices capable of instant voice messaging; wherein a list of one or more potential recipients is displayed on the device, the instant messages are temporarily stored using a unique identifier, and a file manager stores, retrieves and/or deletes the messages in response to the users request.

42. In addition, should LINE's mobile messenger app system be found to not literally infringe the asserted claims of the '433 Patent, LINE's accused mobile messenger app system would nevertheless infringe the asserted claims of the '433 Patent. More specifically, the accused mobile messenger app system performs substantially the same function (instant voice messaging), in substantially the same way (identifying potentially available recipients, storing messages using unique identifiers and a file manager for storing, retrieving and/or deleting the messages), to yield substantially the same result (delivering voice messages to available intended recipients and wherein the messages may be stored, retrieved and/or deleted). LINE would thus be liable for direct infringement under the doctrine of equivalents.

43. LINE has indirectly infringed and continues to indirectly infringe at least Claims 1-5, 7-12, 14-17 and 25-27 of the '433 Patent in this judicial district and elsewhere in the United States by, among other things, actively inducing the using, offering for sale, selling, or importing the mobile messenger app. LINE's customers who purchase the mobile messenger app and operate such application in accordance with LINE's instructions directly infringe one or more of the forgoing claims of the '433 Patent in violation of 35 U.S.C. § 271. LINE directly and indirectly instructs its customers through training videos, demonstrations, brochures, installation and/or user guides, such as those located at the following:

<http://line.me/en>

<https://itunes.apple.com/us/app/line>

<https://play.google.com/store/apps>

[www.youtube.com](http://www.youtube.com)

LINE is thereby liable for infringement of the '433 Patent under 35 U.S.C. § 271(b).

44. LINE has indirectly infringed and continues to indirectly infringe at least Claims 1-5, 7-12, 14-17 and 25-27 of the '433 Patent in this judicial district and elsewhere in the United States by, among other things, contributing to the direct infringement by others including, without limitation customers using the mobile messenger app, by making, offering to sell, selling and/or importing into the United States, a component of a patented machine, manufacture or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringing the '433 Patent and not a staple article or commodity of commerce suitable for substantial non-infringing use.

45. For example, the mobile messenger app is a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patent process. Furthermore, the mobile messenger app is a material part of the claimed inventions and upon information and belief is not a staple article or commodity of commerce suitable for substantial non-infringing use. LINE is, therefore, liable for infringement under 35 U.S.C. § 271(c).

46. LINE will have been on notice of the '433 Patent since, at the latest, the service of this complaint upon LINE. By the time of trial, LINE will have known and intended (since receiving such notice) that its continued actions would actively induce, and contribute to, the infringement of one or more of Claims 1-5, 7-12, 14-17 and 25-27 of the '433 Patent.

47. LINE may have infringed the '433 Patent through other software utilizing the same or reasonably similar functionality, including other versions of its mobile messenger app system. Uniloc reserves the right to discover and pursue all such additional infringing software/devices.

48. Uniloc has been damaged, reparably and irreparably, by LINE's infringement of the '433 Patent and such damage will continue unless and until LINE is enjoined.

**COUNT III**  
(INFRINGEMENT OF U.S. PATENT NO. 7,535,890)

49. Uniloc incorporates paragraphs 1-48 above by reference.

50. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 7,535,890 ("the '890 Patent"), entitled SYSTEM AND METHOD FOR INSTANT VOIP MESSAGING that issued on May 19, 2009. A true and correct copy of the '890 Patent is attached as Exhibit C hereto.

51. Uniloc USA is the exclusive licensee of the '890 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.

52. LINE has directly infringed, and continues to directly infringe one or more claims of the '890 Patent in this judicial district and elsewhere in Texas, including at least Claims 1-6, 9, 14, 15, 17-20, 23, 28, 29, 31, 32, 33, 34, 37, 40-43, 46, 51, 52, 53, 54, 57, 62, 63, 64, 65 and 68-69 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling the LINE mobile messenger app system running iOS, Android and/or WP8 during the pendency of the '890 Patent which software and associated LINE servers perform instant voice messaging over Wi-Fi and the Internet between persons using cellphones and/or other devices capable of instant voice messaging; wherein the instant messages are temporarily stored if an intended message recipient is unavailable and thereafter delivered once the intend recipient becomes available.

53. In addition, should LINE's mobile messenger app system be found to not literally infringe the asserted claims of the '890 Patent, LINE's accused mobile messenger app system would nevertheless infringe the asserted claims of the '890 Patent. More specifically, the accused mobile messenger app system performs substantially the same function (instant voice messaging), in substantially the same way (via a client/server environment), to yield substantially the same result (delivering voice messages to available intended recipients). LINE would thus be liable for direct infringement under the doctrine of equivalents.

54. LINE has indirectly infringed and continues to indirectly infringe at least Claims 1-6, 9, 14, 15, 17-20, 23, 28, 29, 31, 32, 33, 34, 37, 40-43, 46, 51, 52, 53, 54, 57, 62, 63, 64, 65 and 68-69 of the '890 Patent in this judicial district and elsewhere in the United States by, among

other things, actively inducing the using, offering for sale, selling, or importing the mobile messenger app. LINE's customers who purchase the mobile messenger app and operate such application in accordance with LINE's instructions directly infringe one or more of the forgoing claims of the '890 Patent in violation of 35 U.S.C. § 271. LINE directly and indirectly instructs its customers through training videos, demonstrations, brochures, installation and/or user guides, such as those located at the following:

<http://line.me/en>

<https://itunes.apple.com/us/app/line>

<https://play.google.com/store/apps>

[www.youtube.com](http://www.youtube.com)

LINE is thereby liable for infringement of the '890 Patent under 35 U.S.C. § 271(b).

55. LINE has indirectly infringed and continues to indirectly infringe at least Claims 1-6, 9, 14, 15, 17-20, 23, 28, 29, 31, 32, 33, 34, 37, 40-43, 46, 51, 52, 53, 54, 57, 62, 63, 64, 65 and 68-69 of the '890 Patent in this judicial district and elsewhere in the United States by, among other things, contributing to the direct infringement by others including, without limitation customers using the mobile messenger app, by making, offering to sell, selling and/or importing into the United States, a component of a patented machine, manufacture or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringing the '890 Patent and not a staple article or commodity of commerce suitable for substantial non-infringing use.

56. For example, the mobile messenger app is a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patent process.



Furthermore, the mobile messenger app is a material part of the claimed inventions and upon information and belief is not a staple article or commodity of commerce suitable for substantial non-infringing use. LINE is, therefore, liable for infringement under 35 U.S.C. § 271(c).

57. LINE will have been on notice of the '890 Patent since, at the latest, the service of this complaint upon LINE. By the time of trial, LINE will have known and intended (since receiving such notice) that its continued actions would actively induce, and contribute to, the infringement of one or more of Claims 1-6, 9, 14, 15, 17-20, 23, 28, 29, 31, 32, 33, 34, 37, 40-43, 46, 51, 52, 53, 54, 57, 62, 63, 64, 65 and 68-69 of the '890 Patent.

58. LINE may have infringed the '890 Patent through other software utilizing the same or reasonably similar functionality, including other versions of its mobile messenger app system. Uniloc reserves the right to discover and pursue all such additional infringing software/devices.

59. Uniloc has been damaged, reparably and irreparably, by LINE's infringement of the '890 Patent and such damage will continue unless and until LINE is enjoined.

**COUNT IV**  
(INFRINGEMENT OF U.S. PATENT NO. 8,199,747)

60. Uniloc incorporates paragraphs 1-59 above by reference.

61. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 8,199,747 ("the '747 Patent"), entitled SYSTEM AND METHOD FOR INSTANT VOIP MESSAGING that issued on June 12, 2012. A true and correct copy of the '747 Patent is attached as Exhibit D hereto.

62. Uniloc USA is the exclusive licensee of the '747 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.

63. LINE has directly infringed, and continues to directly infringe one or more claims of the '747 Patent in this judicial district and elsewhere in Texas, including at least Claims 1-3 and 12-14 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling the LINE mobile messenger app system running iOS, Android and/or WP8 during the pendency of the '747 Patent which software and associated LINE servers perform instant voice messaging over Wi-Fi and the Internet between persons using cellphones and/or other devices capable of instant voice messaging; wherein the instant message audio file is generated and one or more files attached thereto and transmitting the files to available recipients and temporarily storing the message if an intended recipient is unavailable and thereafter delivered once the intend recipient becomes available.

64. In addition, should LINE's mobile messenger app system be found to not literally infringe the asserted claims of the '747 Patent, LINE's accused mobile messenger app system would nevertheless infringe the asserted claims of the '747 Patent. More specifically, the accused mobile app performs substantially the same function (instant voice messaging), in substantially the same way (recording and transmitting a message to be audibly played by one or more recipients and temporarily storing messages for a recipient who is unavailable), to yield substantially the same result (delivering voice messages with attached file(s) to available intended recipients). LINE would thus be liable for direct infringement under the doctrine of equivalents.

65. LINE has indirectly infringed and continues to indirectly infringe at least Claims 1-3 and 12-14 of the '747 Patent in this judicial district and elsewhere in the United States by, among other things, actively inducing the using, offering for sale, selling, or importing the mobile messenger app. LINE's customers who purchase the mobile messenger app and operate

such application in accordance with LINE's instructions directly infringe one or more of the forgoing claims of the '747 Patent in violation of 35 U.S.C. § 271. LINE directly and indirectly instructs its customers through training videos, demonstrations, brochures, installation and/or user guides, such as those located at the following:

<http://line.me/en>

<https://itunes.apple.com/us/app/line>

<https://play.google.com/store/apps>

[www.youtube.com](http://www.youtube.com)

LINE is thereby liable for infringement of the '747 Patent under 35 U.S.C. § 271(b).

66. LINE has indirectly infringed and continues to indirectly infringe at least Claims 1-3 and 12-14 of the '747 Patent in this judicial district and elsewhere in the United States by, among other things, contributing to the direct infringement by others including, without limitation customers using the mobile messenger app, by making, offering to sell, selling and/or importing into the United States, a component of a patented machine, manufacture or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringing the '747 Patent and not a staple article or commodity of commerce suitable for substantial non-infringing use.

67. For example, the mobile messenger app is a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patent process. Furthermore, the mobile messenger app is a material part of the claimed inventions and upon information and belief is not a staple article or commodity of commerce suitable for substantial non-infringing use. LINE is, therefore, liable for infringement under 35 U.S.C. § 271(c).

68. LINE will have been on notice of the '747 Patent since, at the latest, the service of this complaint upon LINE. By the time of trial, LINE will have known and intended (since receiving such notice) that its continued actions would actively induce, and contribute to, the infringement of one or more of Claims 1-3 and 12-14 of the '747 Patent.

69. LINE may have infringed the '747 Patent through other software utilizing the same or reasonably similar functionality, including other versions of its mobile messenger app system. Uniloc reserves the right to discover and pursue all such additional infringing software/devices.

70. Uniloc has been damaged, reparably and irreparably, by LINE's infringement of the '747 Patent and such damage will continue unless and until LINE is enjoined.

**COUNT V**  
(INFRINGEMENT OF U.S. PATENT NO. 8,243,723)

71. Uniloc incorporates paragraphs 1-70 above by reference.

72. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 8,243,723 ("the '723 Patent"), entitled SYSTEM AND METHOD FOR INSTANT VOIP MESSAGING that issued on August 14, 2012. A true and correct copy of the '723 Patent is attached as Exhibit E hereto.

73. Uniloc USA is the exclusive licensee of the '723 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.

74. LINE has directly infringed, and continues to directly infringe one or more claims of the '723 Patent in this judicial district and elsewhere in Texas, including at least Claims 1-3 literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling the LINE mobile messenger app system running iOS, Android

and/or WP8 during the pendency of the '723 Patent which software and associated LINE servers perform instant voice messaging over Wi-Fi and the Internet between persons using cellphones and/or other devices capable of instant voice messaging; wherein the availability of the recipients' nodes is monitored, recorded and displayed and the instant message(s) are temporarily stored if an intended message recipient is unavailable and thereafter delivered once the intend recipient becomes available.

75. In addition, should LINE's mobile messenger app system be found to not literally infringe the asserted claims of the '723 Patent, LINE's accused mobile messenger app system would nevertheless infringe the asserted claims of the '723 Patent. More specifically, the accused mobile app performs substantially the same function (instant voice messaging), in substantially the same way (monitoring, recording and displaying recipients' availability), to yield substantially the same result (delivering voice messages to available intended recipients and storing messages for unavailable recipients until they become available). LINE would thus be liable for direct infringement under the doctrine of equivalents.

76. LINE has indirectly infringed and continues to indirectly infringe at least Claims 1-3 of the '723 Patent in this judicial district and elsewhere in the United States by, among other things, actively inducing the using, offering for sale, selling, or importing the mobile messenger app. LINE's customers who purchase the mobile messenger app and operate such application in accordance with LINE's instructions directly infringe one or more of the forgoing claims of the '723 Patent in violation of 35 U.S.C. § 271. LINE directly and indirectly instructs its customers through training videos, demonstrations, brochures, installation and/or user guides, such as those located at the following:

<http://line.me/en>

<https://itunes.apple.com/us/app/line>

<https://play.google.com/store/apps>

[www.youtube.com](http://www.youtube.com)

LINE is thereby liable for infringement of the '723 Patent under 35 U.S.C. § 271(b).

77. LINE has indirectly infringed and continues to indirectly infringe at least Claims 1-3 of the '723 Patent in this judicial district and elsewhere in the United States by, among other things, contributing to the direct infringement by others including, without limitation customers using the mobile messenger app, by making, offering to sell, selling and/or importing into the United States, a component of a patented machine, manufacture or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringing the '723 Patent and not a staple article or commodity of commerce suitable for substantial non-infringing use.

78. For example, the mobile messenger app is a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patent process. Furthermore, the mobile messenger app is a material part of the claimed inventions and upon information and belief is not a staple article or commodity of commerce suitable for substantial non-infringing use. LINE is, therefore, liable for infringement under 35 U.S.C. § 271(c).

79. LINE will have been on notice of the '723 Patent since, at the latest, the service of this complaint upon LINE. By the time of trial, LINE will have known and intended (since receiving such notice) that its continued actions would actively induce, and contribute to, the infringement of one or more of Claims 1-3 of the '723 Patent.

80. LINE may have infringed the '723 Patent through other software utilizing the same or reasonably similar functionality, including other versions of its mobile messenger app

system. Uniloc reserves the right to discover and pursue all such additional infringing software/devices.

81. Uniloc has been damaged, reparably and irreparably, by LINE's infringement of the '723 Patent and such damage will continue unless and until LINE is enjoined.

**PRAYER FOR RELIEF**

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

(A) that LINE has infringed the '622 Patent, '890 Patent, '747 Patent, '723 Patent and the '433 Patent;

(B) awarding Uniloc its damages suffered as a result of LINE's infringement of the '622 Patent, '890 Patent, '747 Patent, '723 Patent and the '433 Patent pursuant to 35 U.S.C. § 284;

(C) enjoining LINE, 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 '622 Patent, '890 Patent, '747 Patent, '723 Patent and the '433 Patent pursuant to 35 U.S.C. § 283;

(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: July 11, 2016

Respectfully submitted,

/s/ Kevin Gannon

Craig Tadlock

Texas State Bar No. 00791766

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**ATTORNEYS FOR THE PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/EMF system per Local Rule 5(a)(3) on July 11, 2016.

By: /s/ Kevin Gannon