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11 **Attorneys for Plaintiffs**

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 UNILOC USA, INC. and
15 UNILOC LUXEMBOURG, S.A.,

16 Plaintiffs,

17 v.

18 BOX, INC.,

19 Defendant.

) **Case No.:**
)
) **COMPLAINT FOR PATENT**
) **INFRINGEMENT**
)
) **DEMAND FOR JURY TRIAL**

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23 Plaintiffs, Uniloc USA, Inc. and Uniloc Luxembourg, S.A. (together “Uniloc”),
24 as and for their complaint against Defendant, Box, Inc. (“Box”), allege as follows:
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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.

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. Box is a Delaware corporation having a principal place of business at 900 Jefferson Ave., Redwood City, CA 94063, and offers its products and services, including those accused herein of infringement, to customers and/or potential customers located in this District. Box may be served with process through its registered agent for service: Corporation Service Company, 2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA 95833.

JURISDICTION AND VENUE

4. 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 and 1338(a).

5. This Court has personal jurisdiction over Box due, *inter alia*, to Box’s continuous presence within, and systematic contacts with, this District, including having its principal place of business in this District. Through its continuous importation of accused products into this District, Box has derived substantial revenues here and has purposefully availed itself of the privileges and benefits of conducting business in this District.

6. Venue is proper in this Court pursuant to 28 U.S.C. § 1400(b).

INTRADISTRICT ASSIGNMENT

7. Pursuant to Civil Local Rules 3-2(c) and (d), this action should be assigned to the San Francisco Division or the Oakland Division because Box is

1 located in Redwood City, California and a substantial part of the events which give
2 rise to the claims are believed to have occurred in San Mateo County.

3 **COUNT I**

4 (INFRINGEMENT OF U.S. PATENT NO. 6,470,345)

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

6 9. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No.
7 6,470,345 (“the ’345 Patent”), entitled REPLACEMENT OF SUBSTRINGS IN
8 FILE/DIRECTORY PATHNAMES WITH NUMERIC TOKENS that issued on
9 October 22, 2002. A true and correct copy of the ’345 Patent is attached as Exhibit A
10 hereto.

11 10. Uniloc USA is the exclusive licensee of the ’345 Patent with ownership
12 of all substantial rights therein, including the right to grant sublicenses, to exclude
13 others, and to enforce, sue and recover past damages for the infringement thereof.

14 11. Box manufactures, uses, sells, offers for sale and/or imports into the
15 United States the Box content management and file sharing software, including
16 Business, Individual and Enterprise Editions (the “Accused Products”), which replace
17 substrings in file and directory pathnames with tokens by reading a name string to be
18 converted into a list of tokens, canonicalizing a current working directory and the
19 name string to form a pathname that contains a plurality of substrings, parsing the
20 pathname and replacing each substring with an associated token, and validating the
21 parsed pathname containing the list of tokens.

22 12. Box has directly infringed, and continues to directly infringe, one or
23 more claims of the ’345 Patent in the United States during the pendency of the ’345
24 Patent, including claims 1, 9, 17, 25, 33, and 41 literally and/or under the doctrine of
25 equivalents, by or through making, using, offering for sale, selling and/or importing
26 the Accused Products.

27 13. Should use of the Accused Products be found to not literally infringe the
28 asserted claims of the ’345 Patent, use of the Accused Products would nevertheless

1 infringe the asserted claims of the '345 Patent. More specifically, the Accused
2 Products perform substantially the same function (replacing substrings in file and
3 directory pathnames with tokens), in substantially the same way (canonicalizing a
4 current working directory and name string to form a pathname containing a plurality
5 of substrings), to yield substantially the same result (validating the parsed pathname
6 containing the list of tokens). Box would thus be liable for direct infringement under
7 the doctrine of equivalents.

8 14. Box has indirectly infringed, and continues to indirectly infringe, claims
9 1, 9, 17, 25, 33, and 41 of the '345 Patent in the United States by, among other things,
10 actively inducing the using, offering for sale, selling and/or importing the Accused
11 Products having the functionality described in this Count. Box's customers who use
12 such the Accused Products in accordance with Box's instructions directly infringe
13 claims 1, 9, 17, 25, 33, and 41 of the '345 Patent in violation of 35 U.S.C. § 271.
14 Box directly and/or indirectly intentionally instructs its customers to infringe through
15 training videos, demonstrations, brochures, installation and/or user guides such as
16 those located at one or more of the following:

- 17 • www.box.com
- 18 • <https://developer.box.com/reference>
- 19 • [https://community.box.com/t5/Managing-Files-and-Folders/Rename
20 Files-And-Folders/ta-p/50467https://support.myharmony.com/en-
21 us/compatibility](https://community.box.com/t5/Managing-Files-and-Folders/Rename-Files-And-Folders/ta-p/50467https://support.myharmony.com/en-us/compatibility)

22 Box is thereby liable for infringement of the '345 Patent under 35 U.S.C.
23 § 271(b).

24 15. Box has indirectly infringed, and continues to indirectly infringe, claims
25 1, 9, 17, 25, 33, and 41 of the '345 Patent in this District and elsewhere in the United
26 States by, among other things, contributing to the direct infringement by others
27 including, without limitation customers using the Accused Products, by making,
28 offering to sell, selling and/or importing into the United States, a component of a

1 patented machine, manufacture or combination, or an apparatus for use in practicing a
2 patented process, constituting a material part of the invention, knowing the same to
3 be especially made or especially adapted for use in infringing the '345 Patent and not
4 a staple article or commodity of commerce suitable for substantial non-infringing use.

5 16. Box will have been on notice of the '345 Patent since, at the latest, the
6 service of this complaint upon Box. By the time of trial, Box will have known and
7 intended (since receiving such notice) that its continued actions would actively
8 induce the infringement of 1, 9, 17, 25, 33, and 41 of the '345 Patent.

9 17. Box may have infringed the '345 Patent through other devices and/or
10 software utilizing the same or reasonably similar functionality as the Accused
11 Products. Uniloc reserves the right to discover and pursue all such additional
12 infringing software and devices.

13 18. Uniloc has been damaged by Box's infringement of the '345 Patent.

14 **PRAYER FOR RELIEF**

15 Uniloc requests that the Court enter judgment against Box as follows:

16 (A) declaring that Box has infringed the '345 Patent;

17 (B) awarding Uniloc its damages suffered as a result of Box's infringement
18 of the '345 Patent;

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

20 (D) granting Uniloc such further relief as the Court may deem just and
21 proper.

22 **DEMAND FOR JURY TRIAL**

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

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26 Dated: June 8, 2018

Respectfully submitted,

27 */s/ Aaron S. Jacobs*

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