1 2 3 4 5 6 7 8	Aaron S. Jacobs (Cal. State Bar No. 214953) ajacobs@princelobel.com James J. Foster (Cal. N.D. Bar No. 553285) jfoster@princelobel.com Prince Lobel Tye LLP One International Place, Suite 3700 Boston, MA 02110 617-456-8000  Matthew D. Vella (CA No. 314548) mvella@princelobel.com PRINCE LOBEL TYE LLP 410 Broadway Avenue, Suite 180 Laguna Beach, CA 92651  Attorneys for Plaintiffs		
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10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
13 14	UNILOC USA, INC., UNILOC 2017 LLC ) and UNILOC LICENSING USA LLC,	Case No.: 3:18-cv-03432-JST	
15	Plaintiffs,	FIRST AMENDED COMPLAINT FOR	
16	v.	PATENT INFRINGEMENT	
17	BOX, INC.,	DEMAND FOR JURY TRIAL	
18	Defendant.		
19			
20	Plaintiffs, Uniloc USA, Inc., Uniloc 2017 LLC and Uniloc Licensing USA LLC (together		
21	"Uniloc"), as and for their First Amended Complaint against defendant, Box, Inc. ("Box"), allege		
22	as follows:		
23	THE	PARTIES	
24	1. Uniloc USA, Inc. is a Texas corporation having a principal place of business at		
25	Legacy Town Center I, Suite 380, 7160 Dallas Parkway, Plano, Texas 75024.		
26	2. Uniloc 2017 LLC is a Delaware corporation having addresses at 1209 Orange		
27	Street, Wilmington, Delaware 19801 and 620 Newport Center Drive, Newport Beach, California		
28	92660.		
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FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

1	3.	Uniloc Licensing USA LLC is a Delaware corporation having addresses at 1209	
2	Orange Stree	t, Wilmington, Delaware 19801 and 620 Newport Center Drive, Newport Beach,	
3	California 92	2660.	
4	4.	Uniloc is the owner of all substantial rights, title and interest in and to U.S. Patent	
5	No. 6,470,34	5 ("the '345 Patent"), entitled REPLACEMENT OF SUBSTRINGS IN	
6	FILE/DIREC	CTORY PATHNAMES WITH NUMERIC TOKENS that issued on October 22, 2002.	
7	A true and correct copy of the '345 Patent was attached as Exhibit A to the original complaint in		
8	this case.		
9	5.	Box is a Delaware corporation having a principal place of business at 900 Jefferson	
10	Ave., Redwo	od City, CA 94063, and offers its products and services, including those accused	
11	herein of infr	ringement, to customers and/or potential customers located in this District. Box may	
12	be served wit	th process through its registered agent for service: Corporation Service Company,	
13	2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA 95833.		
14	JURISDICTION AND VENUE		
15	6.	Uniloc brings this action for patent infringement under the patent laws of the United	
16	States, 35 U.S.C. § 271 et seq. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§		
17	1331 and 1338(a).		
18	7.	This Court has personal jurisdiction over Box due, inter alia, to Box's continuous	
19	presence within, and systematic contacts with, this District, including having its principal place of		
20	business in this District. Through its continuous importation of accused products into this District,		
21	Box has derived substantial revenues here and has purposefully availed itself of the privileges and		
22	benefits of co	onducting business in this District.	
23	8.	Venue is proper in this Court pursuant to 28 U.S.C. § 1400(b).	
24		COUNT I	
25		(INFRINGEMENT OF U.S. PATENT NO. 6,470,345)	
26	9.	Uniloc incorporates paragraphs 1-8 above by reference.	
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- 10. Box manufactures, uses, sells, offers for sale and/or imports into the United States the Box content management and file sharing software, including Business, Individual and Enterprise Editions (the "Accused Products"), which replace substrings in file and directory pathnames with tokens by reading a name string to be converted into a list of tokens, canonicalizing a current working directory and the name string to form a pathname that contains a plurality of substrings, parsing the pathname and replacing each substring with an associated token, and validating the parsed pathname containing the list of tokens.
- 11. Box has directly infringed, and continues to directly infringe, one or more claims of the '345 Patent in the United States during the pendency of the '345 Patent, including claims 1, 9, 17, 25, 33, and 41 literally and/or under the doctrine of equivalents, by or through making, using, offering for sale, selling and/or importing the Accused Products.
- 12. Should use of the Accused Products be found to not literally infringe the asserted claims of the '345 Patent, use of the Accused Products would nevertheless infringe the asserted claims of the '345 Patent. More specifically, the Accused Products perform substantially the same function (replacing substrings in file and directory pathnames with tokens), in substantially the same way (canonicalizing a current working directory and name string to form a pathname containing a plurality of substrings), to yield substantially the same result (validating the parsed pathname containing the list of tokens). Box would thus be liable for direct infringement under the doctrine of equivalents.
- 13. Box has indirectly infringed, and continues to indirectly infringe, claims 1, 9, 17, 25, 33, and 41 of the '345 Patent in the United States by, among other things, actively inducing the using, offering for sale, selling and/or importing the Accused Products having the functionality described in this Count. Box's customers who use such the Accused Products in accordance with Box's instructions directly infringe claims 1, 9, 17, 25, 33, and 41 of the '345 Patent in violation of 35 U.S.C. § 271. Box directly and/or indirectly intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installation and/or user guides such as those located at one or more of the following:

www.box.com

2 3 https://developer.box.com/reference

4

https://community.box.com/t5/Managing-Files-and-Folders/Rename Files-And-Folders/ta-p/50467

5

https://support.myharmony.com/en-us/compatibility

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

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14. Box has indirectly infringed, and continues to indirectly infringe, claims

1, 9, 17, 25, 33, and 41 of the '345 Patent in this District and elsewhere in the United States by, among other things, contributing to the direct infringement by others including, without limitation

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customers using the Accused Products, by making, offering to sell, selling and/or importing into

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the United States, a component of a patented machine, manufacture or combination, or an

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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 '345 Patent

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and not a staple article or commodity of commerce suitable for substantial non-infringing use. Box

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

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Box of the original complaint in this case. By the time of trial, Box will have known and intended

Box will have been on notice of the '345 Patent since, at the latest, the service upon

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(since receiving such notice) that its continued actions would actively induce the infringement of 1,

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9, 17, 25, 33, and 41 of the '345 Patent. Despite that knowledge, and as further evidence of its

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intent, Box has refused to discontinue its infringing acts and has also induced infringement by failing to remove the infringing functionality from the Accused Infringing Devices or otherwise

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place a non-infringing limit on their use.

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Box may have infringed the '345 Patent through other devices and/or software utilizing the same or reasonably similar functionality as the Accused Products. Uniloc reserves the

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

right to discover and pursue all such additional infringing software and devices.

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1	PRAYER FOR RELIEF
2	Uniloc requests that the Court enter judgment against Box as follows:
3	(A) declaring that Box has infringed the '345 Patent;
4	(B) awarding Uniloc its damages suffered as a result of Box's infringement of the '345
5	Patent;
6	(C) awarding Uniloc its costs, attorneys' fees, expenses and interest, and
7	(D) granting Uniloc such further relief as the Court may deem just and proper.
8	DEMAND FOR JURY TRIAL
9	Uniloc hereby demands trial by jury on all issues so triable pursuant to Fed. R. Civ. P. 38.
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12	Date: September 5, 2018 Respectfully submitted,
13	/s/ Aaron S. Jacobs
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