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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNILOC 2017 LLC and UNILOC)
14 LICENSING USA LLC,)

15 Plaintiffs,)

16 v.)

17 BOX, INC.,)

18 Defendant.)
19

Case No.: 3:18-cv-03432-JST

SECOND AMENDED COMPLAINT FOR
PATENT INFRINGEMENT

DEMAND FOR JURY TRIAL

20 Plaintiffs, Uniloc 2017 LLC and Uniloc Licensing USA LLC (together “Uniloc”), as and
21 for their Second Amended Complaint against defendant, Box, Inc. (“Box”), allege as follows:

22 **THE PARTIES**

23 1. Uniloc 2017 LLC is a Delaware limited liability company having addresses at 1209
24 Orange Street, Wilmington, Delaware 19801 and 620 Newport Center Drive, Newport Beach,
25 California 92660.

26 2. Uniloc Licensing USA LLC is a Delaware limited liability company having
27 addresses at 1209 Orange Street, Wilmington, Delaware 19801 and 620 Newport Center Drive,
28 Newport Beach, California 92660.

1 and solutions to such problems and shortcomings. The technological improvements and solutions
2 described and claimed in the '345 Patent were not conventional or generic at the time of their
3 respective inventions but involved novel and non-obvious approaches to the problems and
4 shortcomings prevalent in the art at the time.

5 10. The inventions claimed in the '345 Patent involve and cover more than just the
6 performance of well-understood, routine and/or conventional activities known to the industry prior
7 to the invention of such novel and non-obvious methods, systems and devices by the '345 Patent
8 inventors.

9 11. The inventions claimed in the '345 Patent represent technological solutions to
10 technological problems. The written description of the '345 Patent describes in technical detail
11 each of the limitations of the claims, allowing a person of ordinary skill in the art to understand
12 what the limitations cover and how the non-conventional and non-generic combination of claim
13 elements differ markedly from and improved upon what may have been considered conventional
14 or generic.

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

22 13. As set forth in the claim chart attached hereto as Exhibit B, Box has directly
23 infringed, and continues to directly infringe, one or more claims of the '345 Patent in the United
24 States during the pendency of the '345 Patent, including claims 1, 9, 17, 25, 33, and 41 literally
25 and/or under the doctrine of equivalents, by or through making, using, offering for sale, selling
26 and/or importing the Accused Products.

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1 14. Should use of the Accused Products be found to not literally infringe the asserted
2 claims of the '345 Patent, use of the Accused Products would nevertheless infringe the asserted
3 claims of the '345 Patent. More specifically, the Accused Products perform substantially the same
4 function (replacing substrings in file and directory pathnames with tokens), in substantially the
5 same way (canonicalizing a current working directory and name string to form a pathname
6 containing a plurality of substrings), to yield substantially the same result (validating the parsed
7 pathname containing the list of tokens). Box would thus be liable for direct infringement under the
8 doctrine of equivalents.

9 15. Box has indirectly infringed, and continues to indirectly infringe, claims
10 1, 9, 17, 25, 33, and 41 of the '345 Patent in the United States by, among other things, actively
11 inducing the using, offering for sale, selling and/or importing the Accused Products having the
12 functionality described in this Count. Box's customers who use such the Accused Products in
13 accordance with Box's instructions directly infringe claims 1, 9, 17, 25, 33, and 41 of the '345
14 Patent in violation of 35 U.S.C. § 271. Box directly and/or indirectly intentionally instructs its
15 customers to infringe through training videos, demonstrations, brochures, installation and/or user
16 guides such as 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 Files-And-](https://community.box.com/t5/Managing-Files-and-Folders/Rename-Files-And-Folders/ta-p/50467)
20 Folders/ta-p/50467
- 21 • <https://support.myharmony.com/en-us/compatibility>

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

23 16. Box has indirectly infringed, and continues to indirectly infringe, claims
24 1, 9, 17, 25, 33, and 41 of the '345 Patent in this District and elsewhere in the United States by,
25 among other things, contributing to the direct infringement by others including, without limitation
26 customers using the Accused Products, by making, offering to sell, selling and/or importing into
27 the United States, a component of a patented machine, manufacture or combination, or an
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1 apparatus for use in practicing a patented process, constituting a material part of the invention,
2 knowing the same to be especially made or especially adapted for use in infringing the '345 Patent
3 and not a staple article or commodity of commerce suitable for substantial non-infringing use. Box
4 is thereby liable for infringement of the '345 Patent under 35 U.S.C. § 271(c).

5 17. Box will have been on notice of the '345 Patent since, at the latest, the service upon
6 Box of the original complaint in this case. By the time of trial, Box will have known and intended
7 (since receiving such notice) that its continued actions would actively induce and contribute to the
8 infringement of 1, 9, 17, 25, 33, and 41 of the '345 Patent. Despite that knowledge, and as further
9 evidence of its intent, Box has refused to discontinue its infringing acts and has also induced and
10 contributed to infringement by failing to remove the infringing functionality from the Accused
11 Infringing Devices or otherwise place a non-infringing limit on their use.

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

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

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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: November 1, 2018

Respectfully submitted,

13 /s/ Aaron S. Jacobs

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27 ATTORNEYS FOR THE PLAINTIFFS
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