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8 Attorneys for Plaintiffs

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

13 UNILOC 2017 LLC,) **Case No.:**
14 Plaintiff,)
15 v.) **COMPLAINT**
16 BOX, INC.,) **DEMAND FOR JURY TRIAL**
17 Defendant.)

18
19 Plaintiff, Uniloc 2017 LLC (“Uniloc”), for its Complaint against defendant, Box, Inc.
20 (“Box”), alleges:

21 **THE PARTIES**

22 1. Uniloc 2017 LLC is a Delaware limited liability company having addresses at 1209
23 Orange Street, Wilmington, Delaware 19801; 620 Newport Center Drive, Newport Beach,
24 California 92660; and 102 N. College Avenue, Suite 303, Tyler, Texas 75702.

25 2. Uniloc owns all substantial rights, title, and interest in U.S. Patent No. 6,470,345
26 (“the ’345 Patent”), entitled REPLACEMENT OF SUBSTRINGS IN FILE/DIRECTORY
27 PATHNAMES WITH NUMERIC TOKENS, issued October 22, 2002. A copy of the ’345 Patent
28 is attached as Exhibit A.

1 3. Box is a Delaware corporation having a principal place of business at 900 Jefferson
2 Ave., Redwood City, CA 94063.

3 **JURISDICTION**

4 4. Uniloc brings this action for patent infringement under the patent laws of the United
5 States, 35 U.S.C. § 271, *et seq.* This Court has subject matter jurisdiction pursuant to 28 U.S.C.
6 §§ 1331 and 1338(a).

7 **PATENT INFRINGEMENT**

8 5. The '345 Patent describes in detail and claims in various ways inventions in
9 systems and methods for improved file and directory pathnaming, particularly by replacing
10 substrings file and directory pathnames with numeric tokens.

11 6. The '345 Patent describes problems and shortcomings in the then-existing field of
12 file and directory pathnaming, particularly file and directory pathnames having lengthy strings and
13 broken into substrings, and describes and claims novel and inventive technological improvements.

14 7. The written description of the '345 Patent describes in technical detail each of the
15 limitations of the claims, allowing a person of ordinary skill in the art to understand what the
16 limitations cover and how the combination of claim elements differed markedly from and
17 improved upon what may have been considered conventional or generic.

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

25 9. As set forth in the claim chart attached as Exhibit B, Box has infringed, and
26 continues to infringe, claims of the '345 Patent, including claims 1, 9, 17, 25, 33, and 41 by
27 making, using, offering for sale, selling, and importing the Accused Products.

1 10. Box has infringed, and continues to infringe, claims 1, 9, 17, 25, 33, and 41 of the
2 '345 Patent by actively inducing the using, offering for sale, selling, importing of the Accused
3 Products having the functionality described in this Complaint. Box's customers who use the
4 Accused Products in accordance with Box's instructions infringe claims 1, 9, 17, 25, 33, and 41 of
5 the '345 Patent in violation of 35 U.S.C. § 271. Box intentionally instructs its customers to
6 infringe through training videos, demonstrations, brochures, and installation and user guides such
7 as those located at:

- 8 • www.box.com
- 9 • https://developer.box.com/reference
- 10 • https://community.box.com/t5/Managing-Files-and-Folders/Rename-Files-And-
11 Folders/ta-p/50467
- 12 • https://support.myharmony.com/en-us/compatibility

13 11. Box has infringed, and continues to infringe claims 1, 9, 17, 25, 33, and 41 of the
14 '345 Patent by offering to sell, selling, and importing a component of a patented machine,
15 manufacture, or combination, or an apparatus for use in practicing a patented process, constituting
16 a material part of the invention, knowing the same to be especially made or especially adapted for
17 use in infringing the '345 Patent and not a staple article or commodity of commerce suitable for
18 substantial non-infringing use.

19 12. Box will have been on notice of the '345 Patent since, at the latest, the service upon
20 Box of the original complaint in Case No. 3:18-cv-03432-JST. By the time of trial, Box will have
21 known and intended (since receiving such notice) that its continued actions would actively induce
22 and contribute to the infringement of 1, 9, 17, 25, 33, and 41 of the '345 Patent. Despite that
23 knowledge, and as further evidence of its intent, Box has refused to discontinue its infringing acts
24 and has also induced and contributed to infringement by failing to remove the infringing
25 functionality from the Accused Products or otherwise place a non-infringing limit on their use.

26 13. Box may have infringed the '345 Patent through other devices or software utilizing
27 the same or reasonably similar functionality as the Accused Products.

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

2 **PRAYER FOR RELIEF**

3 Uniloc requests that the Court enter judgment against Box:

- 4 (A) declaring that Box has infringed the '345 Patent;
5 (B) awarding Uniloc its damages suffered as a result of Box's infringement;
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 demands trial by jury on all issues.

10
11 Date: November 20, 2018

Respectfully submitted,

12 /s/ Aaron S. Jacobs

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