

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

DR. LAKSHMI ARUNACHALAM

Plaintiff,

v.

LYFT, INC.,

Defendant.

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CV No.: 5:19cv19

JURY DEMAND

COMPLAINT FOR PATENT INFRINGEMENT

I. THE PARTIES

- 1. Plaintiff, Dr. Lakshmi Arunachalam, (“Dr. Arunachalam”), is an individual that maintains her principal place of business at 222 Stanford Avenue, Menlo Park, CA 94025.
- 2. Defendant Lyft, Inc. is a Delaware corporation that maintains its principal place of business at 185 Berry Street, Suite 5000, San Francisco, CA 94107.
- 3. Defendant Lyft, Inc. does business in Texas and can be served with process through its Registered Agent for Service, The Corporation Trust Company, located at 4701 Cox Road, Ste 285, Glen Allen, VA 23060; 1999 Bryan St., Ste. 900, Dallas, TX 75201-3136; and 1209 Orange Street, Wilmington, DE.

II. JURISDICTION AND VENUE

- 4. This action arises under the patent laws of the United States, Title 35 of the United States Code. The Court’s jurisdiction over this action is proper under the above statutes, including 35 U.S.C. § 271 et seq. and 28 U.S.C. § 1338.

5. Personal jurisdiction exists over the Defendant because there exists sufficient contact with the forum as a result of business conducted within the State of Texas and within this district. Personal jurisdiction also exists specifically over the Defendant because of Defendant's conduct in making and using infringing products and practices within the State of Texas and this district, wherein it has a regular, established place of business.
6. Venue is proper in this Court under 28 U.S.C. §§139(b), (c), and (d), as well as 28 U.S.C. § 1400(b).

III. PATENT INFRINGEMENT

7. Plaintiff, Dr. Arunachalam, is the inventor and assignee of all rights, title and interest in and under United States Patent No. 7,930,340 ("the '340 patent"), which duly and legally issued on April 19, 2011, with Plaintiff Dr. Arunachalam, as the named inventor for a Network Transaction Portal.
8. Defendant has been and continues to infringe the '340 patent by at least making and using, without authority, products and practices regarding at least its Lyft car transportation mobile Web app, providing ride-hailing, ridesharing and peer-to-peer transportation and payment services, matching drivers with passengers who request rides, with partnerships with dining, entertainment and sports-anchored developments which host thousands of events year-round and systems and methods that fall within the scope of the claims of the '340 patent. Defendant will continue to infringe the '340 patent unless enjoined by this Court. Plaintiff is without an adequate remedy at law.
9. Defendant's infringement of the '340 patent has been and continues to be willful.
10. Defendant has and is actively inducing and/or contributing to the infringement of the '340 patent among itself and by others.

11. This is an exceptional case within the meaning of 35 U.S.C. § 285.

IV. PRAYER FOR RELIEF

12. Plaintiff respectfully requests this Court to enter judgment against Defendant and against Defendant's subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with Defendant, granting the following relief:

- A. An award of damages adequate to compensate Plaintiff for the infringement that has occurred, together with prejudgment interest from the date infringement of the '340 Patent began;
- B. An award to Plaintiff of all remedies available under 35 U.S.C. § 284;
- C. An award to Plaintiff of all remedies available under 35 U.S.C. § 285;
- D. A preliminary and thereafter a permanent injunction under 35 U.S.C. § 283 against Defendant's infringement of the '340 Patent, and, in the alternative, in the event injunctive relief is not granted as requested by Plaintiff, an award of a compulsory future royalty;
- E. That the Court award to Plaintiff her costs and attorneys' fees incurred in this action; and
- F. Such other and further relief as the Court or a jury deems just and proper.

V. DEMAND FOR JURY TRIAL

13. Plaintiff demands a jury trial on all issues.

14. Exhibit I: U.S. Patent No. 7,930,340 is incorporated by reference herein, as if fully incorporated herein, and is attached herewith.

Respectfully submitted,

Lakshmi Arunachalam

DATED: February 4, 2019


Dr. Lakshmi Arunachalam

222 Stanford Avenue, Menlo Park, CA 94025
Tel: 650 690 0995; Fax: 650 854 3393
Laks22002@yahoo.com
Pro Se Plaintiff Patent Owner

VERIFICATION

I, Dr. Lakshmi Arunachalam, Plaintiff in the above entitled action, hereby verify under penalty of perjury, under the laws of the United States of America, that the above statement of facts and laws is true and correct, according to the best of my current information, knowledge, and belief, so help me God, pursuant to 28 U.S.C. 1746(1). See the Supremacy Clause in the Constitution for the United States of America, as lawfully amended (hereinafter "U. S. Constitution").

Dated: February 4, 2019

Signed: 
Printed: Dr. Lakshmi Arunachalam


**DECLARATION OF DR. LAKSHMI ARUNACHALAM IN SUPPORT OF
PLAINTIFF'S PATENT INFRINGEMENT COMPLAINT**

I, Dr. LAKSHMI ARUNACHALAM, declare:

I am the inventor and assignee of the patent-in-suit, U.S. Patent No. 7,930,340 ('340). I reside at 222 Stanford Avenue, Menlo Park, CA 94025. I am *pro se* Plaintiff in the above-captioned action. I make this declaration based on personal knowledge and, if called upon to do so, could testify competently thereto.

1. Attached as **Exhibit 1** is a true and correct copy of Plaintiff's U.S. Patent No. 7,930,340.

I declare under the penalty of perjury under the laws of the United States and the State of California and Texas that the foregoing is true and correct. Executed this 4th day of February, 2019 in Menlo Park, California.


Dr. Lakshmi Arunachalam
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CERTIFICATE OF MAILING

I, Dr. Lakshmi Arunachalam, hereby certify that on February 4, 2019, I sent via Express Mail via the U.S. Post Office an original and 4 copies of the attached Complaint, Dr. Arunachalam's Declaration and Verification in support thereof, Exhibit 1, Civil Cover Sheet and 1 copy of Form A0-440, Summons in a Civil Action, to the Clerk of the Court, United States District Court for the Eastern District of Texas, Texarkana Division at 500 North State Line Avenue, Texarkana, Texas 75501 for filing and docketing in this case.

February 4, 2019



/s/Lakshmi Arunachalam/

Signature of Plaintiff

Dr. Lakshmi Arunachalam

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Exhibit 1: U.S. Patent No. 7,930,340