**IN THE UNITED STATES DISTRICT COURT**
**FOR THE WESTERN DISTRICT OF TEXAS**
**AUSTIN DIVISION**

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|---|---|
| UNILOC 2017 LLC,<br><br>        Plaintiff,<br><br>v.<br><br>BOX, INC.,<br><br>        Defendant. | CIVIL ACTION NO. 1:19-cv-594<br><br><br>JURY TRIAL DEMANDED |

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, Uniloc 2017 LLC ("Uniloc"), for its complaint against defendant, Box, Inc. ("Box"), alleges:

**THE PARTIES**

1.      Uniloc 2017 LLC is a Delaware limited liability company.

2.      Box is a Delaware corporation and has a regular and established place of business at One American Center, 600 Congress Avenue, Austin, Texas 78701.  Box may be served with process through its registered agent: Corporation Service Company, 1560 Broadway, Suite 2090, Denver, Colorado 80202-5180.

**JURISDICTION**

3.      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).

**COUNT I**
(INFRINGEMENT OF U.S. PATENT NO. 6,324,578)

4.      Uniloc incorporates by reference paragraphs 1-3 above.

5.      Uniloc is the owner, by assignment, of U.S. Patent No. 6,324,578 ("the '578 Patent"), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR

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MANAGEMENT OF CONFIGURABLE APPLICATION PROGRAMS ON A NETWORK, which issued on November 27, 2001 on an application filed on December 14, 1998. A copy of the '578 Patent is attached as Exhibit A.

6.      The following image from https://app.box.com/services describes, at least in part, how the Box configurable content management and collaboration system works:
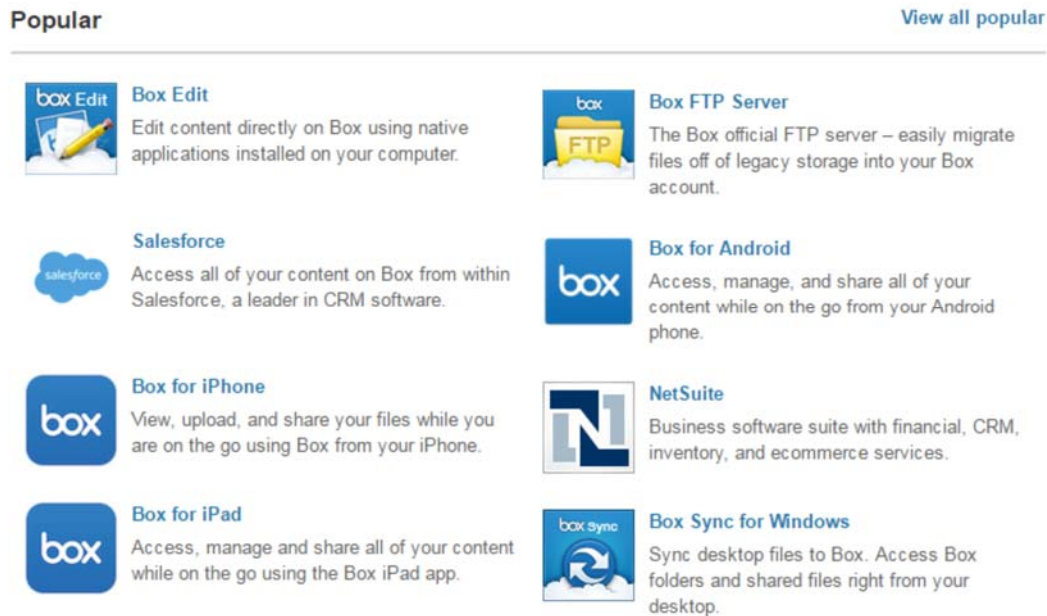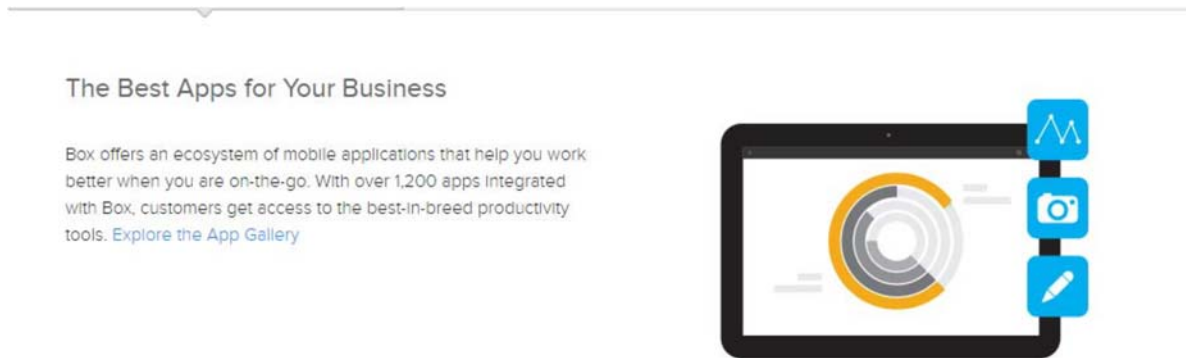


7.      The following image from www.box.com describes, at least in part, how the Box content management and collaboration system offers Desktop Apps through Box's web browser service:
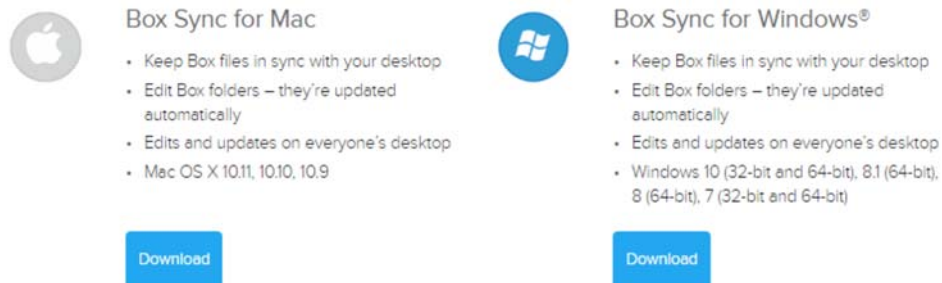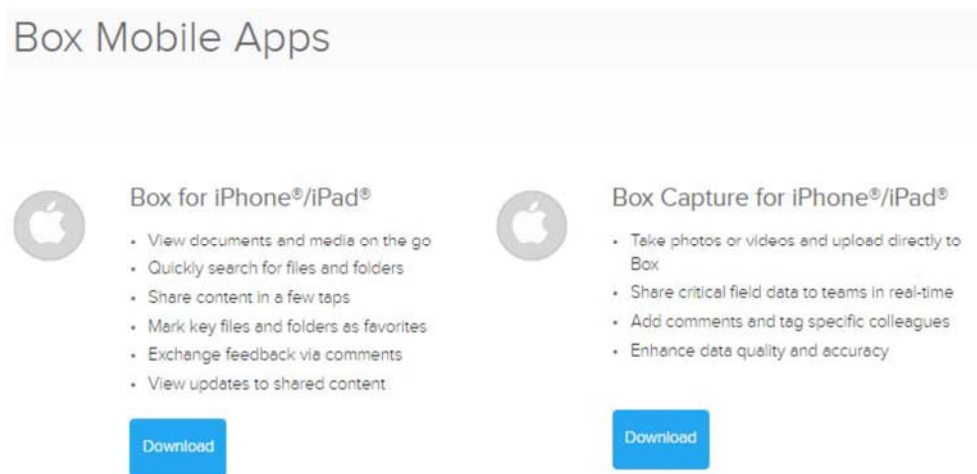
8.      The following image from www.box.com describes, at least in part, how Box

offers apps through its content management and collaboration system:



9.      The following image from www.box.com describes, at least in part, how Box

offers mobile apps through its content management and collaboration system:



10.     The following describes, at least in part, how the Box content management and

collaboration system works:

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11.     The following image from www.box.com describes, at least in part, how Box offers partner apps with built-in integration to Box's content management and collaboration system:



12.     The following image from www.box.com describes, at least in part, how Box offers partner apps with built-in integration to Box's content management and collaboration system:

13.     The following image describes, at least in part, how users may log in to the Box content management and collaboration system:
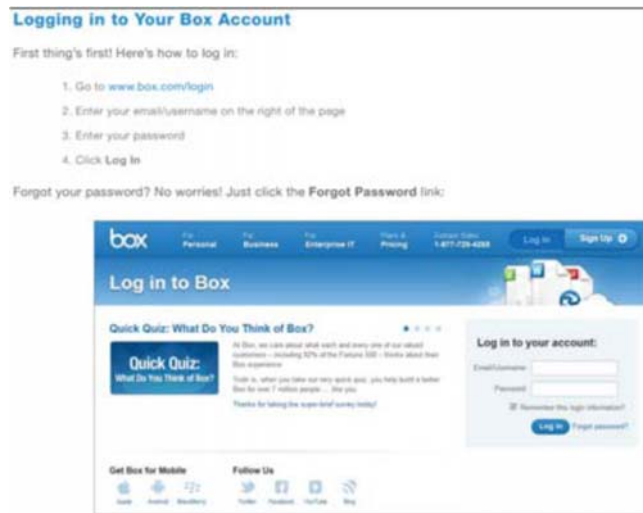


14.     The following image describes Box's login process that requires a valid email address and password to be entered by users:
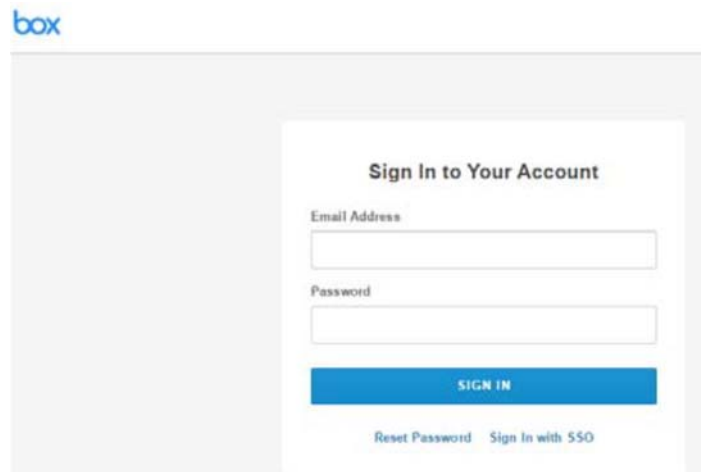


15.     The following image describes Server Farms that Box has used to host, at least in part, its content management and collaboration system:

## "Box" Server Farms

- Box.com uses a mixture of Amazon Web Services' "EC2" virtual cloud servers combined with their own servers in 10 leased data centers
- Their leased data centers are located in
  Palo Alto, California
  Portland, Oregon
  Chicago, Illinois
  New York state
  Sao Paulo, Brazil
  Amsterdam, Netherlands
  Tokyo, Japan
  Singapore
  Sydney, Australia

16.     The following image shows how the Box content management and collaboration

system works once an authorized user has logged in:
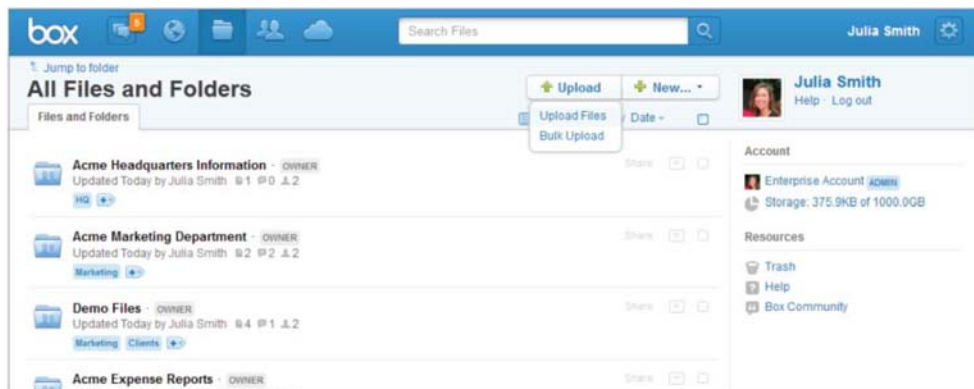


17.     The following image shows how the Box content management and collaboration

system offers configurable options once an authorized user has logged in:
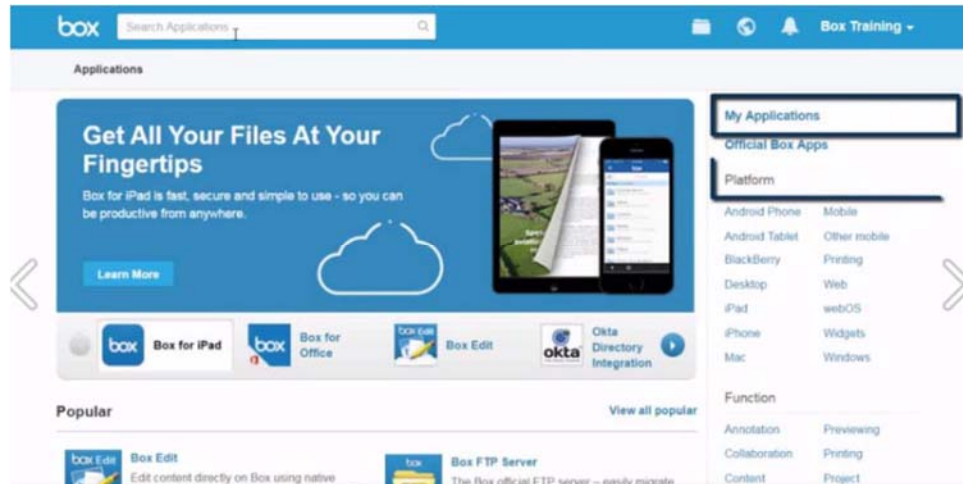
18.     The following image shows how the Box content management and collaboration system uses servers:
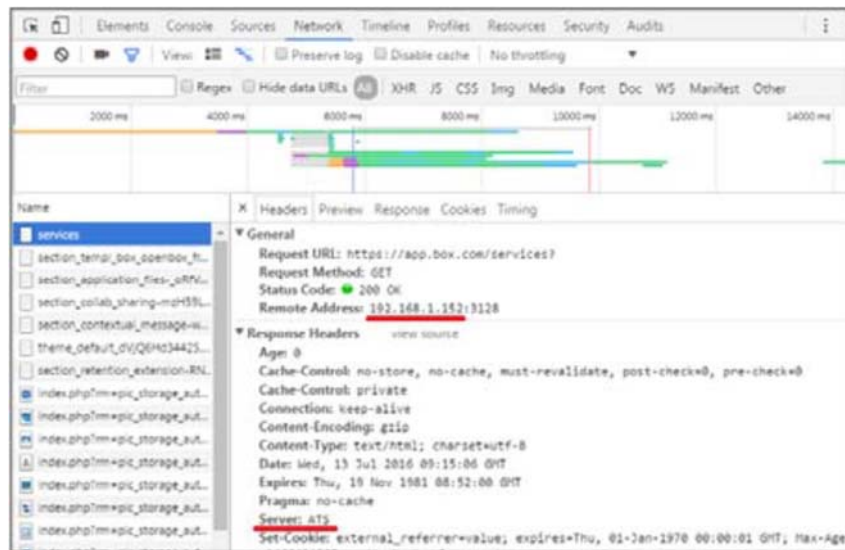


19.     The following shows how an administrator can restrict collaboration using the Box content management and collaboration system:
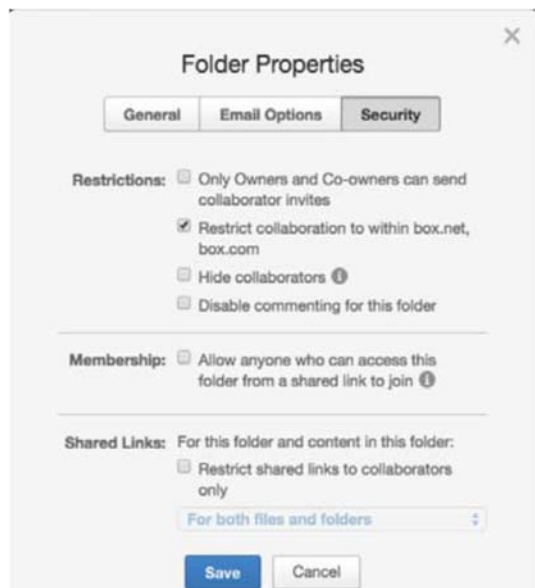
20.     The following image from www.community.box.com shows how a user may customize email notifications using the Box content management and collaboration system:



21.     The following image from www.community.box.com shows how an administrator is given rights using the Box content management and collaboration system:
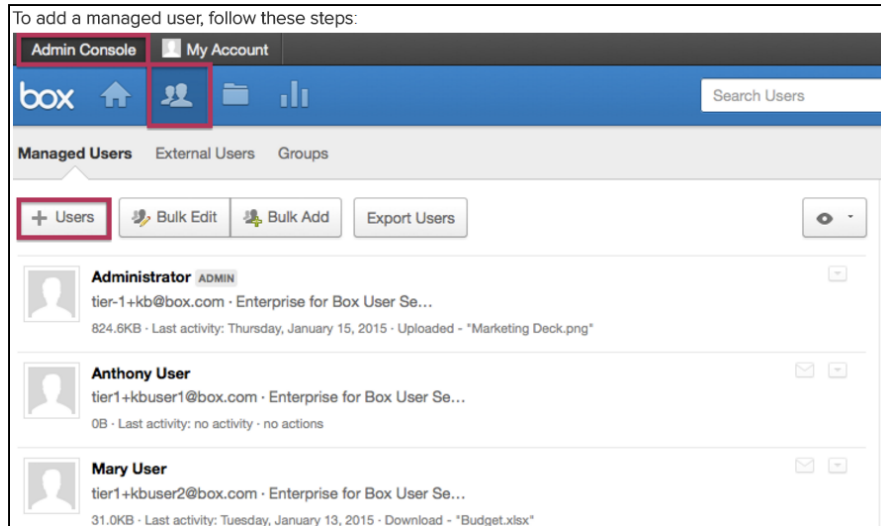
22.     The following image from www.community.box.com shows how an administrator can add and remove users and manage user settings in the Box content management and collaboration system:
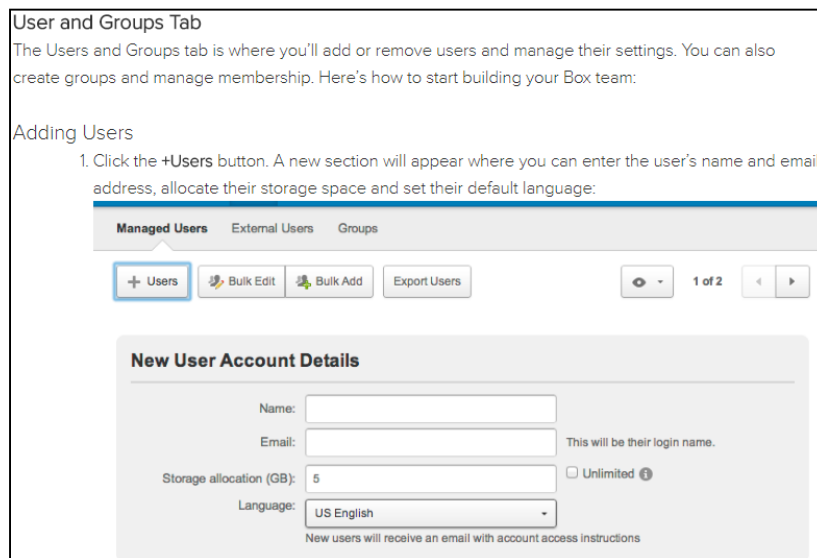


23.     The following image from www.community.box.com shows how an administrator can grant access permission to users of the Box content management and collaboration system:

24.     As set forth above, Box has infringed at least claim 1 of the '578 Patent by making, using, offering for sale and/or selling the Box content management and collaboration system, which software and associated backend server architecture allows for installing an application program having configurable preferences and authorized users on a server coupled to a network, distributing an application launcher program to a client, obtaining a user set of the configurable preferences, obtaining an administrator set of configurable preferences, and executing the application program using the user and administrator sets of configurable preferences responsive to a request from a user.

25.     Box has also infringed at least claim 1 of the '578 Patent by actively inducing the use of the Box content management and collaboration system. Box's customers who used the Box content management and collaboration system in accordance with Box's instructions infringed the '578 Patent, as described above.  Box intentionally instructed its customers to infringe through instructions on using the Box system as exemplified in the figures above.

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26.     Box has also infringed at least claim 1 of the '578 Patent by contributing to the infringement by others including customers using the Box content management and collaboration system, by offering to sell, selling or otherwise commercially offering use of the system, which was used to infringe the '578 Patent, and constituted a material part of the invention.  Box knew portions of the software contained in the accused system were especially written solely for use in infringement of the '578 Patent.  Box knew those portions had no use other than for infringement.

27.     Box was on notice of the '578 Patent since, at the latest, the service of the original complaint upon Box on August 17, 2016 in the previous action between Uniloc and Box for infringement of the '578 Patent in the Eastern District of Texas.  Box knew and intended (since receiving that notice) that its continued actions actively induced, and contributed to, the infringement of the '578 Patent.

28.     Box may have infringed the '578 Patent through other software and architecture utilizing the same or reasonably similar functionality, including other versions of its content management and collaboration system.

29.     Uniloc has been damaged by Box's infringement of the '578 Patent.

## COUNT II
### (INFRINGEMENT OF U.S. PATENT NO. 7,069,293)

30.     Uniloc incorporates by reference paragraphs 1-29 above.

31.     Uniloc is the owner, by assignment, of U.S. Patent No. 7,069,293 ("the '293 Patent"), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR DISTRIBUTION OF APPLICATION PROGRAMS TO A TARGET STATION ON A NETWORK, which issued on June 27, 2006 and claims priority to an application filed on December 14, 1998. A copy of the '293 Patent is attached as Exhibit B.

32.     The following image from https://app.box.com/services shows that Box distributes numerous apps through its content management and collaboration system:
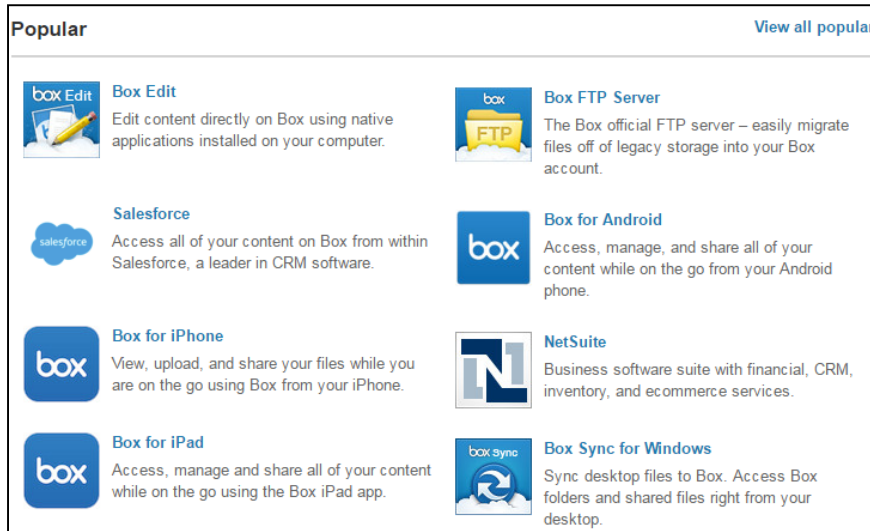


33.     The following image shows that Box uses one or more on-demand servers to distribute apps from its content management and collaboration system:
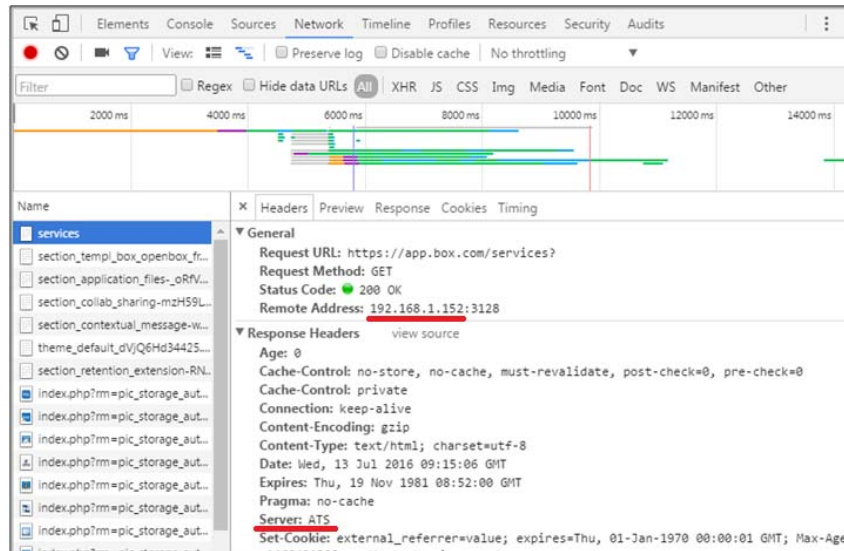


34.     The following image shows that the Box distributes apps from a source Box directory to a user's target directory where the app is registered using information in the app's file packets:
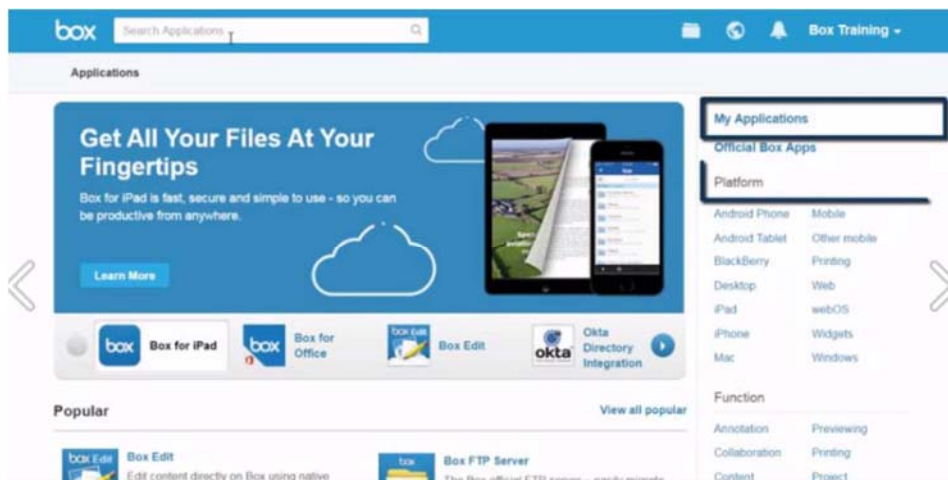
35.     As set forth above, Box has infringed, and continues to infringe, at least claim 1 of the '293 Patent by making, using, offering for sale and/or selling the Box content management and collaboration system, which software and associated backend server architecture allow for providing an application program for distribution to a network server, specifying source and target directories for the program to be distributed, preparing a file packet associated with the program including a segment configured to initiate registration operations for the application program at a target on-demand server, and distributing the file packet to the target on-demand server to make the program available for use by a client user.

36.     Box will have been on notice of the '293 Patent since, at the latest, the service of the original complaint upon Box on August 17, 2016 in the previous action between Uniloc and Box for infringement of the '578 Patent in the Eastern District of Texas.  Box knew and intended (since receiving that notice) that its continued actions would infringe the '293 Patent.

37.     Box may have infringed the '293 Patent through other software and architecture utilizing the same or reasonably similar functionality, including other versions of its content management and collaboration system.

38.     Uniloc has been damaged by Box's infringement of the '293 Patent.

**PRAYER FOR RELIEF**

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

(A)     that Box has infringed the '578 Patent and the '293 Patent;

(B)     awarding Uniloc its damages suffered as a result of Box's infringement of the

'578 Patent and the '293 Patent;

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

(D)     granting Uniloc such other and further relief as the Court may deem just and

proper.

**DEMAND FOR JURY TRIAL**

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

Dated: June 10, 2019                                Respectfully submitted,

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