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11                    UNITED STATES DISTRICT COURT

12                    CENTRAL DISTRICT OF CALIFORNIA

13                        SANTA ANA DIVISION

14   UNILOC 2017 LLC,                    | Civil Action No.  8:19-cv-01150-JLS-ADS

15          Plaintiff,

16   v.                                  | **AMENDED COMPLAINT**

17   INFOR, INC.,

18          Defendant.

19          Plaintiff, Uniloc 2017 LLC ("Uniloc 2017"), for its Amended Complaint against defendant,

20   Infor, Inc. ("Infor"), alleges:

21                              **THE PARTIES**

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

23          2.      Infor is a Delaware corporation.

24                              **JURISDICTION**

25          3.      Uniloc 2017 brings this action for patent infringement under the patent laws of the

26   United States, 35 U.S.C. § 271, et seq.  This Court has subject matter jurisdiction under 28 U.S.C.

27   §§ 1331 and 1338(a).

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                                        1

3307527.v1

## COUNT I

### (INFRINGEMENT OF U.S. PATENT NO. 6,324,578)

4.      Uniloc 2017 incorporates paragraphs 1-3 above by reference.

5.      Uniloc 2017 is the owner, by assignment, of U.S. Patent No. 6,324,578 ("the '578 Patent"), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR 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 was attached to the Complaint, Docket No. 1, as Exhibit A.

6.      Infor infringed claims 1-38 of the '578 Patent by making, using, offering for sale, and selling its software licensing and management system, which software and associated backend server architecture allowed for installing application programs such as Infor CRM Cloud, 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.

7.      As an example, the attached Exhibit C to this Amended Complaint demonstrates that Infor's implementation of its CRM Cloud application program incorporated each limitation of claims 1-38. Infor's implementation of other Infor products similarly incorporated each limitation of claims 1-38 of the '578 patent.

8.      Infor also infringed the '578 Patent by actively inducing the use of the Infor software licensing and management system.  Infor's customers who used the Infor software licensing and management system in accordance with Infor's instructions infringed the '578 Patent, as described above.  Infor intentionally instructed its customers to infringe through instructions on using the Infor CRM Cloud software and Infor system.

9.      Infor also infringed the '578 Patent by contributing to the infringement by others, including customers using the Infor software licensing and management system, by offering to sell, selling, or otherwise commercially offering use of the system, which was used to infringe the '578

1  Patent, and constituted a material part of the invention.  Infor knew portions of the software

2  contained in the accused system were especially written solely for use to implement what Infor

3  knew as infringement of the '578 Patent.  Infor knew those portions had no use, other than for

4  infringement.

5        10.    Infor was on notice of the '578 Patent since, at the latest, the service on Infor on

6  May 12, 2017 of the complaint filed in the previous action between Uniloc USA and Infor in the

7  Eastern District of Texas.  Infor knew and intended (since receiving such notice) that its continued

8  actions actively induced, and contributed to, the infringement of the '578 Patent.

9        11.    Infor may have infringed the '578 Patent through other software and architecture

10  utilizing the same or reasonably similar functionality as described above.

11        12.    Uniloc 2017 was damaged by Infor's infringement of the '578 Patent.

12  <div align="center">**COUNT II**</div>

13  <div align="center">(INFRINGEMENT OF U.S. PATENT NO. 7,069,293)</div>

14        13.    Uniloc 2017 incorporates by reference paragraphs 1-12 above.

15        14.    Uniloc 2017 is the owner, by assignment, of U.S. Patent No. 7,069,293 ("the '293

16  Patent"), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR

17  LICENSING OF APPLICATION PROGRAMS TO A TARGET STATION ON A NETWORK,

18  which issued on June 27, 2006, claiming priority to an application filed on December 14, 1998.  A

19  copy of the '293 Patent was attached as Exhibit B to the Complaint. Docket No. 1.

20        15.    Info distributes its application programs to a centralized network management

21  server for further distribution to edge servers.

22        16.    Infor specifies to the centralized network management server both where the

23  application programs can be found and where the application programs will be sent.

24        17.    Infor prepares a file package associated with each application program that includes

25  code to cause the edge servers to register the application program on the edge server to make it

26  recognized by and available to users at a client, who can then request execution of the application

27  program.

28

18.     Infor infringed, and continues to infringe, claims 1, 3-5, 8, 12, 14, 17, and 19 of the '293 Patent by making, using, importing, offering for sale, and selling the Infor software licensing and management system, which software and associated backend server architecture allow for providing an application program such as Infor CRM Cloud for licensing 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.

19.     Infor has been on notice of the '293 Patent since, at the latest, the service on Infor on May 12, 2017, of the complaint in the previous action between Uniloc USA and Infor in the Eastern District of Texas.  Infor knew and intended (since receiving that notice) that its continued actions would infringe the '293 Patent.

20.     Infor may have infringed the '293 Patent through other software and architecture utilizing the same or reasonably similar functionality as described above.

21.     Uniloc 2017 has been and is being damaged by Infor's infringement of the '293 Patent.

**PRAYER FOR RELIEF**

Uniloc 2017 requests that the Court enter judgment against Infor:

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

(B)     awarding Uniloc 2017 its damages suffered as a result of Infor's infringement of the '578 Patent and the '293 Patent;

(C)     awarding Uniloc 2017 its costs, attorneys' fees, expenses, and interest, and

(D)     granting Uniloc 2017 such other and further relief as the Court may deem just and proper.

Dated: October 10, 2019

Respectfully submitted,

*/s/ James J. Foster*

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