IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

REMOTE CONCEPTS LLC, Plaintiff, v. **SLACK TECHNOLOGIES, INC.,** Defendant.	**Civil Action No. 1:20-cv-3452** **JURY TRIAL DEMANDED**

COMPLAINT

This is an action for patent infringement in which Remote Concepts LLC ("Remote Concepts" or "Plaintiff") makes the following allegations against Slack Technologies, Inc. ("Slack" or "Defendant"):

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 United States Code ("U.S.C.") to prevent and enjoin Defendant from infringing and profiting, in an illegal and unauthorized manner, and without authorization and/or consent from Plaintiff from U.S. Patent No. 7,016,942 ("the '942 Patent").

PARTIES

2. Remote Concepts LLC is a limited liability company organized and existing under the laws of the state of Texas.

3. Defendant Slack Technologies, Inc. is a corporation organized and existing under the laws of Delaware that maintains an established place of business at 1681 Chestnut Pl, Denver,

CO 80202. Defendant may be served at Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808.

JURISDICTION AND VENUE

4. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271(a)-(b), 281, and 284 - 85. This Court has subject matter jurisdiction over this action under 28 U.S.C. §1331 and §1338(a).

5. Venue is proper in this district pursuant to 28 U.S.C. § 1400(b). Defendant has a regular place of business in this district at 1681 Chestnut Pl, Denver, CO 80202 and has committed acts of patent infringement in this district.

6. Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Colorado Long Arm Statute, due at least to Defendant's substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; (ii) having a regular established place of business within the forum state; and (iii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Colorado and in this district.

U.S. PATENT NO. 7,016,942

7. Remote Concepts incorporates paragraphs 1 through 7 as though fully set forth herein.

8. On March 21, 2006, United States Patent No. 7,016,942 (the "'942 Patent") was duly and legally issued by the United States Patent and Trademark Office for an invention entitled "Dynamic Hosting." A true and correct copy of the '942 Patent is attached hereto as Exhibit A.

9. Gary Odom is the listed inventor of the '942 Patent.

10. Plaintiff is the owner by assignment of the '942 Patent, with all rights in and to that patent.

11. The '942 Patent is valid and enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

12. The '942 Patent recognized problems with the existing client-server environment, wherein a client computer's performance potential was largely untapped. Exhibit A at 1:12-14. As broadband-based connectivity increased, client computers were then able to sustain network connectivity indefinitely, in contrast to previously short-lived dial-up connections. Exhibit A at 15-18.

13. In a traditional client-server setup, one or more clients connect directly to a server through a network. *Id.* 2:26-28. The clients receive data from the server and the server acts as a conduit for data transfer between clients — in other words, the server is a hub for data communication between the clients. *Id.* at 2:28-33. In the prior art, a server acts as the host, and may also have a backup server, but at no point does a client dynamically become the server for the other clients. *Id.* at 34-41. The inventions disclosed in the '942 Patent perform a method for dynamic hosting, which is where a computer connects to a server in a network as a client and one of the clients begins to act as the host or server for the other clients, thereby no longer using the server to function as the host or server for the other clients. *Id.* at 2:59-65. This allows for a novel solution to a technological problem, *i.e.*, "offloading server tasks to specific clients" and "creating self-sustaining dynamic client-server configurations independent of the server to which the clients originally connected." *Id.* at 1:33-36.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 7,016,942

14. Defendant, directly or through its intermediaries, makes, uses, imports, sells, and/or offers for sale products and/or systems that infringes the claims of the '942 patent when placed into operation by Defendant or its end users, *i.e.*, Slack Voice and Video calls which utilize WebRTC and substantially similar products (the "Accused Instrumentalities").

15. Upon information and belief, Defendant has been and is now infringing claim 13 of the '942 Patent in the State of Colorado, in this Judicial District, and elsewhere in the United States, by, among other things, directly or through intermediaries, making, using, selling and/or offering for sale the Accused Instrumentalities, covered by one or more claims of the '942 Patent to the injury of Plaintiff. Defendant is directly infringing, literally infringing, and/or infringing the '942 Patent under the doctrine of equivalents. Defendant is thus liable for infringement of the '942 Patent pursuant to 35 U.S.C. § 271(a).

16. When placed into operation by Defendant or its end users, the Accused Instrumentalities infringe claim 13 of the '942 Patent as they perform a computer implemented method for channeling data through a network from an initial client/server connectivity to direct client-to-client communication comprising the following steps: at least a first and second client computers connecting through a network to a static server at a pre-designated address, thereby respectively establishing a communications session with said static server, wherein said first client computer and said second client computer not communicating with each other prior to respectively establishing said communications session with said static server; said first computer transmitting a first data to said second computer via said static server; while said first computer maintaining network connectivity to said static server, said first computer directly transmitting a second data to said second computer without said static server intervening.

17. For example, regarding Claim 13, Slack Voice and Video calls is used to set up video calls between users.

Slack voice and video call security

Looking for details about the security of Slack's voice and video features? You're in the right place!

Tip: If you're having connection, audio, or video issues with Slack Calls, click here to begin troubleshooting.

Security

We use the WebRTC standard for real-time communications with the latest recommended security techniques. Here's how we protect the integrity and confidentiality of a call:

- All traffic is encrypted in transit.
- Media traffic is encrypted with SRTP using a DTLS-SRTP key exchange.
- Real-time data channel traffic is encrypted with DTLS.
- HTTPS or secure WebSockets using TLS 1.2 are used for signaling communication with our media server.

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