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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 TELESIGN CORPORATION,) Case No.
12)
13 PLAINTIFF,) **COMPLAINT FOR PATENT**
14 v.) **INFRINGEMENT**
15 TWILIO, INC.,)
16 DEFENDANT.) **JURY TRIAL DEMANDED**
17)

18
19 **TELESIGN CORPORATION’S**
20 **COMPLAINT FOR PATENT INFRINGEMENT**

21 Plaintiff TeleSign Corporation (“TeleSign”) for this Complaint against
22 Defendant Twilio, Inc. (“Twilio”) and on information and belief alleges as follows:

23 **Introduction**

24 1. TeleSign is an industry leader in internet security and user authentication.
25 TeleSign is one of the fastest-growing technology companies in North America, sells
26 to some of the top websites in the world, and is a market leader in two-step-
27 verification technology.

1 2. TeleSign helps its customers secure billions of end-user accounts
2 worldwide and prevent registration fraud.

3 3. The technology offered by TeleSign gives businesses the ability to
4 connect a unique identity with every account to verify new registrations and
5 authenticate users. TeleSign helps businesses detect suspicious users and better
6 protect their existing user base from account compromise. TeleSign is trusted by
7 some of the world’s largest companies to help prevent fraudulent accounts and stop
8 account takeovers.

9 4. TeleSign owns United States Patent No. 7,945,034 (the “‘034 Patent”),
10 entitled “Process for determining characteristics of a telephone number,” and Nos.
11 8,462,920 (the “‘920 Patent”) and 8,687,038 (the “‘038 Patent”), both entitled
12 “Registration, verification and notification system” (collectively, the “Asserted
13 Patents”).

14 5. Twilio competes directly with TeleSign.

15 6. Twilio has used, and continues to use, TeleSign’s patented technology in
16 connection with products and services that Twilio makes, sells, offers for sell and/or
17 uses without TeleSign’s permission, causing TeleSign irreparable harm.

18 7. In this suit, TeleSign asks the Court to enjoin Twilio from making, using,
19 selling or offering to sell products and services claimed by the Asserted Patents and to
20 award monetary relief for Twilio’s past violations.

21 **Jurisdiction and Venue**

22 8. This is an action for patent infringement arising under the patent laws of
23 the United States, 35 U.S.C. § 1 et seq., including §§ 271 and 281. This Court has
24 original jurisdiction over this patent-infringement action under 28 U.S.C. § 1338(a).

25 9. Venue is proper in this Court at least because Twilio is responsible for
26 acts of infringement occurring in the Central District of California, as alleged in this
27 Complaint, and has delivered or caused to be delivered infringing products or services
28

1 in the Central District of California. Moreover, TeleSign is headquartered in the
2 Central District of California, where the harm from Twilio's infringement has been
3 and is being felt.

4 **Plaintiff TeleSign**

5 10. Plaintiff TeleSign is a California corporation, duly authorized to do
6 business in the State of California, with its principal place of business in Marina Del
7 Rey, California.

8 **Defendant Twilio**

9 11. Defendant Twilio is a Delaware corporation with its principal place of
10 business in San Francisco, California. Twilio maintains its principal place of business
11 at 645 Harrison Street, San Francisco, California 94107 and can be served at 548
12 Market Street #14510, San Francisco, California 94104

13 **The Asserted Patents**

14 12. The United States Patent and Trademark Office issued the '034 Patent
15 (attached as Exhibit A) on May 17, 2011, the '920 Patent (attached as Exhibit B) on
16 June 11, 2013, and the '038 Patent (attached as Exhibit C) on April 1, 2014.

17 13. TeleSign is the owner of all right, title and interest in the Asserted
18 Patents, including all rights to pursue and collect damages for past, present, and future
19 infringement of the Asserted Patents.

20 **FIRST CLAIM FOR PATENT INFRINGEMENT ('034 PATENT)**

21 14. TeleSign repeats and realleges each of the allegations contained in the
22 paragraphs above.

23 15. On May 17, 2011, United States Patent No. 7,945,034, entitled "Process
24 for determining characteristics of a telephone number," was duly and legally issued by
25 the United States Patent and Trademark Office.

1 16. Plaintiff TeleSign is the owner of the '034 Patent with full rights to
2 pursue recovery of royalties or damages for infringement of the '034 Patent, including
3 full rights to recover past and future damages.

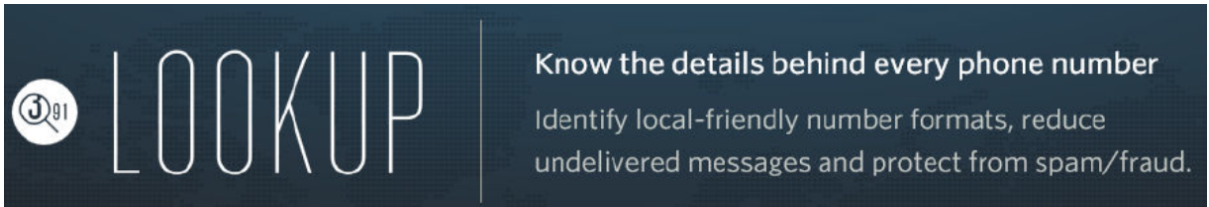
4 17. Each claim of the '034 Patent is valid and enforceable.

5 18. On March 31, 2015, Twilio posted a blog entry stating “Today we’re
6 happy to introduce you to a new product called Lookup, an API that will retrieve
7 detailed information about a phone number.”

8 <https://www.twilio.com/blog/2015/03/introducing-twilio-lookup.html>.

9 19. Defendant Twilio has infringed the '034 Patent and, unless enjoined, will
10 continue to do so, by using, offering for sale and selling services claimed by the '034
11 Patent.

12 20. Twilio makes, sells, offers for sale and/or uses, in the United States its
13 “lookup” technology, including through its website at www.twilio.com, as indicated
14 by, for example, <https://www.twilio.com/lookup> and as shown below (hereafter
15 referred as “Twilio Lookup”).



20

21 21. The '034 patent relates to, among other things, using “characteristics of a
22 telephone number” in a registration process. These characteristics could include for
23 example, whether a telephone number is a landline (claim 4), the phone carrier (claim
24 1), and geographic characteristics such as a country (claim 6).

25 22. By way of example only, the screen capture below from
26 <https://www.twilio.com/lookup> indicates that Twilio Lookup technology determines at
27 least these characteristics.

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```

curl -X GET https://lookups.twilio.com/v1/PhoneNumbers/55-11-5525-6325\
-d "Type=carrier"
-u "{AccountSid}:{AuthToken}"

```

```

{
  "country_code": "BR",
  "phone_number": "+551155256325",
  "national_format": "(11) 5525-6325",
  "url": "https://lookups.twilio.com/v1/PhoneNumber/+551155256325",
  "carrier": {
    "type": "landline",
    "error_code": null,
    "mobile_network_code": null,
    "mobile_country_code": null,
    "name": "Vivo"
  }
}

```

23. On information and belief, Twilio Lookup includes the performance of each step of the methods claimed by the '034 Patent.

24. TeleSign has been damaged by Twilio's infringement of the '034 Patent and will suffer additional irreparable damage unless Twilio is enjoined from continuing to infringe the '034 Patent.

25. TeleSign demands trial by jury for all issues relating to this claim.

26. On information and belief, Twilio's infringement has been willful and continues to be, at least since notice of this Complaint.

SECOND CLAIM FOR PATENT INFRINGEMENT ('920 PATENT)

27. TeleSign repeats and realleges each of the allegations contained in the paragraphs above.

28. On June 11, 2013, United States Patent No. 8,462,920, entitled "Registration, verification and notification system," was duly and legally issued by the United States Patent and Trademark Office.

29. Plaintiff TeleSign is the owner of the '920 Patent with full rights to pursue recovery of royalties or damages for infringement of the '920 Patent, including full rights to recover past and future damages.

30. Each claim of the '920 Patent is valid and enforceable.



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