

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

INTELLECTUAL VENTURES I LLC and	)	
INTELLECTUAL VENTURES II LLC,	)	
	)	
<i>Plaintiffs,</i>	)	C.A. No. 4:24-cv-980
	)	
v.	)	
	)	<b>JURY TRIAL DEMANDED</b>
AMERICAN AIRLINES, INC.	)	
	)	
<i>Defendant.</i>	)	

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (collectively, “Intellectual Ventures,” “IV,” or “Plaintiffs”), in their Complaint for patent infringement against Defendant American Airlines, Inc. (“American” or “Defendant”), hereby alleges as follows:

**NATURE OF THE ACTION**

1. This is a civil action for the infringement of United States Patent No. 8,332,844 (“the ’844 Patent”), United States Patent No. 8,407,722 (“the ’722 Patent”), United States Patent No. 7,949,785 (“the ’785 Patent”), United States Patent No. 8,027,326 (“the ’326 Patent”), United States Patent No. 7,324,469 (“the ’469 Patent”), and United States Patent No. 7,257,582 (“the ’582 Patent”) (collectively, the “Patents-in-Suit”) under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

**THE PARTIES**

**Intellectual Ventures**

2. Plaintiff Intellectual Ventures I LLC (“Intellectual Ventures I”) is a Delaware limited liability company having its principal place of business located at 3150 139th Avenue SE, Bellevue, Washington 98005.

3. Plaintiff Intellectual Ventures II LLC (“Intellectual Ventures II”) is a Delaware limited liability company having its principal place of business located at 3150 139th Avenue SE, Bellevue, Washington 98005.

4. Intellectual Ventures I is the owner of all rights, title, and interest in and to the ’722, ’582, ’326, and ’785 Patents.

5. Intellectual Ventures II is the owner of all rights, title, and interest in and to the ’844 and ’469 Patents.

**American Airlines, Inc.**

6. Upon information and belief, Defendant American Airlines, Inc. (“American”) is a Delaware corporation with its principal place of business at One Skyview Drive, Fort Worth, Texas 76155. American is registered to do business in the State of Texas and has been since at least June 13, 1934. On information and belief, American does business in the State of Texas and the Eastern District of Texas.

7. Upon information and belief, American makes, utilizes, services, tests, distributes, sells, offers, and/or offers for sale in the State of Texas and the Eastern District of Texas products, services, and technologies (“Accused Products and Services”) that infringe the Patents-in-Suit, contributes to the infringement by others, and/or induces others to commit acts of patent infringement in the State of Texas and the Eastern District of Texas.

8. On information and belief, American has derived substantial revenue from infringing acts in the Eastern District of Texas, including from the sale and use of the Accused Products and Services as described in more detail below.

**JURISDICTION AND VENUE**

9. This is an action for patent infringement arising under the patent laws of the United States. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

10. This Court has personal jurisdiction over American because American conducts business in and has committed acts of patent infringement, contributed to infringement by others, and/or induced others to commit acts of patent infringement in this District, the State of Texas, and elsewhere in the United States, and has established minimum contacts with this forum state such that the exercise of jurisdiction over American would not offend the traditional notions of fair play and substantial justice. Upon information and belief, American transacts substantial business with entities and individuals in the State of Texas and the Eastern District of Texas, by, among other things, making, utilizing, servicing, testing, distributing, selling, offering, and/or offering for sale the Accused Products and Services that infringe the Patents-in-Suit, as well as by providing service and support to its customers in this District. American also places certain of the Accused Products and Services into the stream of commerce with the knowledge and expectation that they will be sold in the State of Texas, including this District. For example, American provides Wi-Fi service for its customers and/or employees on American airplanes within this District.

11. American is subject to this Court's general and specific jurisdiction pursuant to due process and/or the Texas Long Arm Statute due at least to American's substantial business in the State of Texas and this District, including maintaining its principal place of business at One Skyview Drive, Fort Worth, Texas 76155, through its past infringing activities, because American regularly does and solicits business herein, and/or because American has engaged in persistent conduct and/or has derived substantial revenues from goods and services provided to customers in the State of Texas and this District.

12. Upon information and belief, American is a corporation organized and existing under the laws of Texas with a principal place of business located at One Skyview Drive, Fort Worth, Texas 76155. On information and belief, American does business itself, or through its subsidiaries, affiliates, and agents, in the State of Texas and the Eastern District of Texas.

13. Upon information and belief, American flies to 18 destinations<sup>1</sup> within Texas in addition to several local routes through its regional brand, American Eagle Airlines.

14. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)-(c) and 1400(b) because American maintains numerous regular and established places of business in this District, and has committed and continues to commit acts of infringement in this District giving rise to this Action.

15. Upon information and belief, American Airlines maintains regular and established places of business via terminals, airplanes, operations centers, ticket counters, as well as other equipment and facilities at airports located in this district. For example, American serves several airports in the Eastern District of Texas: (1) Tyler Pounds Regional Airport (TYR) – located at 700 Skyway Blvd, Tyler, TX 75704; (2) East Texas Regional Airport (GGG) – located at 269 Terminal Cir, Longview, TX 75603; (3) Texarkana Regional Airport (TXK) – located at 2600 Txx Blvd, Texarkana, AR 71854; (4) Easterwood Airport (CLL) – located at 1 McKenzie Terminal Blvd, College Station, TX 77845; and (5) Jack Brooks Regional Airport (BPT) – located at US-69, Beaumont, TX 77705 (collectively “American Airport Locations”).

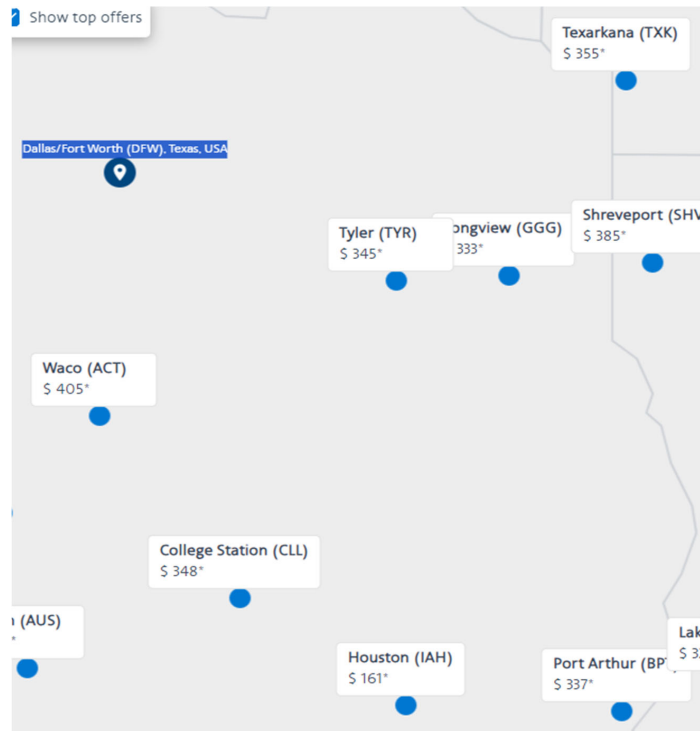
16. Upon information and belief, American holds these American Airport Locations to be regular and established places of business of American in this District by operating flights, selling tickets, and servicing customers at these locations.

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<sup>1</sup> <https://www.aa.com/en-us/flights-to-texas> (Last Accessed on 10/9/2024).

17. Upon information and belief, the American Airport Locations in this District are regular, continuous, and established physical places of business of American, being established, ratified, and/or controlled by American as authorized locations, which are places of business at which American makes, utilizes, services, tests, distributes, offers and/or offers for sale the Accused Products and Services.

18. Upon information and belief, American ratifies and holds these American Airport Locations out as regular and established places of business of American in this District by listing them on American's website, including, *e.g.*, as shown below.<sup>2</sup>



<sup>2</sup> <https://www.aa.com/en-us/fare-finder-map>. (Last Accessed on 10/9/2024).

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