IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

UNILOC USA, INC. et al
        Plaintiffs,
    v.
 	
PAYCHEX, INC.
        Defendant.
 	
RIOT GAMES, INC.,
Defendant.
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		CIVIL ACTION NO. 2:16-cv-1316-RWS
		CONSOLIDATED LEAD CASE
		
		JURY TRIAL DEMANDED
		
		CIVIL ACTION NO. 2:17-cv-284-RWS

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ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

1.   Plaintiffs, Uniloc USA, Inc. and Uniloc Luxembourg, S.A. (together "Uniloc"), as and for their complaint against defendant, Riot Games, Inc. ("Riot Games"), allege as follows:

THE PARTIES

2.   Uniloc USA, Inc. ("Uniloc USA") is a Texas corporation having a principal place of business at Legacy Town Center I, Suite 380, 7160 Dallas Parkway, Plano Texas 75024. Uniloc also maintains a place of business at 102 N. College, Suite 603, Tyler, Texas 75702.

3.   Uniloc Luxembourg S.A. ("Uniloc Luxembourg") is a Luxembourg public limited liability company having a principal place of business at 15, Rue Edward Steichen, 4th Floor, L-2540, Luxembourg (R.C.S. Luxembourg B159161). Uniloc Luxembourg owns several patents in the field of application management in a computer network.

4.   Upon information and belief, Riot Games, Inc. is a Delaware corporation having a place of business in 12333 W Olympic Blvd, Los Angeles CA 90064 and offering its products and/or services, including those accused herein of infringement, for purchase or download to

customers and/or potential customers located in Texas and in the judicial Eastern District of Texas. Riot Games, Inc. may be served with process through its registered agent: CT Corp 818 West Seventh St. Ste 930 Los Angeles, CA 90017.

<u>**JURISDICTION AND VENUE**</u>

1.   Uniloc USA and Uniloc Luxembourg (collectively, "Uniloc") bring 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, 1338(a) and 1367.
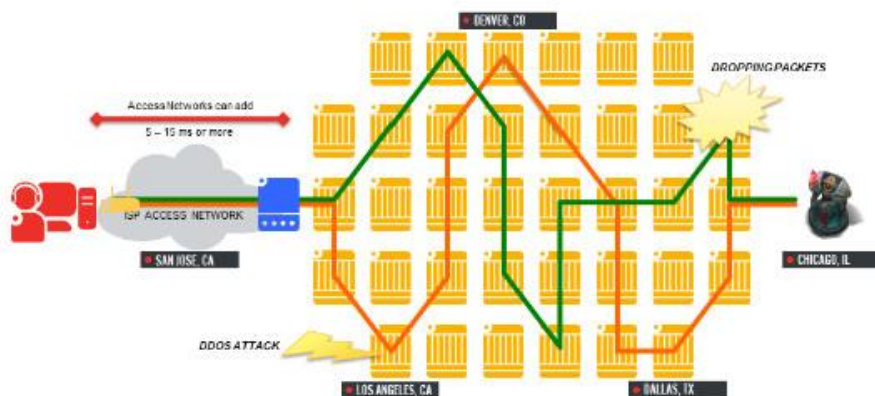
2.   Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(d) and 1400(b). This Court has personal jurisdiction over Riot Games, in part, because Riot Games provides infringing online services to subscribers who reside in this district. Upon information and belief, Riot Games is deemed to reside in this judicial district, has committed acts of infringement in this judicial district, and/or has purposely transacted business involving the accused products and/or services in Texas and this judicial district.

3.   Riot Games is subject to this Court's jurisdiction pursuant to due process and/or the Texas Long Arm Statute due at least to its substantial presence and business in this State and judicial district, including: (A) at least part of its past infringing activities, (B) regularly doing and/or soliciting business in Texas and/or (C) engaging in persistent conduct and/or deriving substantial revenue from goods and services provided to customers in Texas. Riot also has multiple facilities in the EDTX and NDTX.

4.   Riot's gameplay relies on a behind-the-scenes network infrastructure designed to allow critical low latency connections between players. To enable such infrastructure in the central part of the U.S, Riot employs a massive network infrastructure located in the EDTX and NDTX.

5.   Riot's engineering website identifies its only central U.S. server facility in Dallas,

TX. This sever facility – called CyrusOne at 1649 West Frankford Road – is located in the EDTX.

This particular facility is the biggest of its kind in Texas.

Source: https://engineering.riotgames.com/news/fixing-internet-real-time-applications-part-ii

6.   Riot also provide the following high- level snapshot for its architecture:

Source:
https://boards.na.leagueoflegends.com/en/c/help-support/0hVNFnPH-na-server-roadmap-update-pops-peering-and-the-north-bridge

7.   Riot also has its servers and other network infrastructure in at least three other

Eastern EDTX facilities located in the DFW area.

8.   Riot additionally places its equipment inside facilities in the EDTX and NDTX in a peering relationship to more quickly serve Riot game users.

9.   Riot games is also believed to other infrastructure and equipment as part of so - called edge tier.

10.   Riot also describes itself as an eSports tournament organizer.

11.   Riot sponsors Riot Games tournaments, viewing parties, and other events in the Eastern District of Texas (EDTX) and the Northern District of Texas (NDTX).

12.   These Riot Games events in EDTX and NDTX are contracted and registered directly with Riot and displayed on Riot's website.

13.   Riot's interactive website seeks out EDTX residents and NDTX residents allowing them to locate local EDTX and NDTX events as well as register for those events directly on Riot's website using Riot login credentials assigned to each of those EDTX or NDTX residents. EDTX and NDTX residents may later return to Riot's website, login, and continue to obtain additional details of such Riot sponsored events.

14.   For these EDTX and NDTX events, Riots also provides prizes to EDTX and NDTX residents.

15.   Riot contracts with partner companies and venues located within EDTX and NDTX for these tournaments.

16.   As a contractual obligation of these tournaments in the EDTX and the NDTX, only Riot permits only Riot's League of Legend game to be played.

17.   Another contractual obligation of these tournaments, one may not use any element of Riot's intellectual property without Riot's prior approval.

18.   For Riot Game tournaments in the EDTX and NDTX, Riot sets and requires EDTX and NDTX users to follow Riot established protocol concerning game-play.

19.   Riot Games also advertises its EDTX events in the EDTX venues such as shown below:

Coke eSports and Cinemark bring the 2014 Worlds Final to theaters

Want to watch the League of Legends 2014 World Championship Final on a movie screen? Are you in Plano, Texas, Bellevue, Washington, or Evanston, Illinois? Then head over to one of the official Coke eSports and Cinemark viewing parties on October 18th. Each event will feature a selfie wall and giveaways where you can collect limited edition League of Legends cups, Coke Zero gaming hats, and stress balls to help you through all of the Finals' tense

3 YEARS AGO

Source: http://na.leagueoflegends.com/en/tag/viewing-party

20.   One example of an Riot sponsored EDTX event on Riot's website was a viewing party at 7201 N. Central Expressway, Plano, TX on October 31, 2015 attended by 100's of attendees.

21.   Another example of a Riot event in EDTX listed on Riot's website was a two-day tournament where Riot also provided prizes on July 8, 2017 and July 9, 2017 at the Microsoft Store 2601 Preston Road Frisco, TX 75034.

22.   One example of aRiot Event in NDTX listed on Riot's website was a May 1, 2016 tournament where Riot also provided prizes at Shadow Lan, 300 North Coit Rd., Suite 175 Richardson TX, 75080.

23.   Multiple other Riot events have also occurred in the NDTX and EDTX.

24.   In addition to these tournaments, Riot markets to high-schools and colleges for competitive team-play.

25.   Multiple colleges and high schools in the EDTX and NDTX have teams that specifically compete with Riot's games.

26.   Texas A&M, which has campuses in the EDTX and other Texas districts, was one of the eight final teams in Riot's collegiate tournament.

27.   Riot maintains a list of collegiate teams on the following website:
                         https://ulol.na.leagueoflegends.com/

28.   On its collegiate website, Riot lists the following EDTX teams: Texas A&M

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