

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.;
CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS; VERIZON SERVICES CORP.;
VERIZON ENTERPRISE SOLUTIONS, LLC;
VERIZON BUSINESS GLOBAL LLC;
VERIZON BUSINESS NETWORK
SERVICES, LLC; VERIZON CORPORATE
SERVICES GROUP INC.; VERIZON DATA
SERVICES, LLC; VERIZON MEDIA INC.;
and VERIZON ONLINE, LLC,

Defendants.

Case No. 2:20-CV-280

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff KAIFI LLC (“Plaintiff” or “KAIFI”) hereby alleges infringement of United States Patent No. 6,922,728 (“the ’728 Patent”) against Defendants Verizon Communications Inc. (“VZComms”); Cellco Partnership d/b/a Verizon Wireless (“VZWireless”); Verizon Services Corp. (“VZServices”); Verizon Enterprise Solutions, LLC (“VZEnterprise”); Verizon Business Global, LLC (“VZBizGlobal”); Verizon Business Network Services, LLC (VZBizNetwork); Verizon Corporate Services Group Inc. (“VZCorp”); Verizon Data Services, LLC (“VZData”); Verizon Media Inc. (“VZMedia”); and Verizon Online, LLC (“VZOnline”) (collectively, “Defendants” or “Verizon”) as follows:

THE PARTIES

1. Plaintiff KAIFI is a corporation organized and existing under the laws of the State

of Texas, having a principal place of business at 405 State Highway 121, Lewisville, Texas 75067.

2. Defendant VZComms is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 1095 Avenue of the Americas, New York, New York 10036. Defendant VZComms may be served with process through its registered agent at CT Corporation System, 350 North St. Paul Street, Dallas, Texas 75201.

3. Defendant VZWireless is a general partnership organized and existing under the laws of the State of Delaware, with a principal place of business at One Verizon Way Basking Ridge, New Jersey 07920. Defendant VZWireless may be served with process through its registered agent at The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

4. Defendant VZServices is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 1717 Arch Street, 21st Floor, Philadelphia, Pennsylvania 19103. Defendant VZServices may be served with process through its registered agent at CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

5. Defendant VZEnterprise is a limited liability company organized and existing under the laws of the State of Delaware, with a principal place of business at One Verizon Way Basking Ridge, New Jersey 07920. Defendant VZEnterprise may be served with process through its registered agent at The Corporation Trust Company, Corporation Trust Center, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

6. Defendant VZBizGlobal is a limited liability company organized and existing under the laws of the State of Delaware, with a principal place of business at One Verizon Way

Basking Ridge, New Jersey 07920. Defendant VZBizGlobal may be served with process through its registered agent at The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

7. Defendant VZBizNetwork is a limited liability company organized and existing under the laws of the State of Delaware, with a principal place of business at 22001 Loudoun County Parkway, Ashburn, Virginia 20147. Defendant VZBizNetwork may be served with process through its registered agent at CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

8. Defendant VZCorp is a corporation organized and existing under the laws of the State of New York, with a principal place of business at One Verizon Way, Basking Ridge, New Jersey 07920. Defendant VZCorp may be served with process through its registered agent at CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

9. Defendant VZData is a limited liability company organized and existing under the laws of the State of Delaware, with a principal place of business at One East Telecom Parkway, B3E, Temple Terrace, Florida 33637. Defendant VZData may be served with process through its registered agent at CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

10. Defendant VZMedia is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 770 Broadway, New York, New York 10003. Defendant VZMedia may be served with process through its registered agent at CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

11. Defendant VZOnline is a limited liability company organized and existing under the laws of the State of Delaware, with a principal place of business at 22001 Loudoun County

Parkway, Ashburn, Virginia 20147. Defendant VZOnline may be served with process through its registered agent at CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

12. Upon information and belief, Defendant VZComms is the parent corporation of Defendants VZWireless, VZServices, VZEnterprise, VZBizGlobal, VZBizNetwork, VZCorp, VZData, VZMedia, and VZOnline. Defendants have regular and established places of business throughout Texas and the Eastern District of Texas including at 1006 E End Blvd N, Marshall, Texas 75670, and 500 E Loop 281, Longview, Texas 75605.

JURISDICTION; VENUE; JOINDER

13. This action arises under the patent laws of the United States, Title 35 of the United States Code (“U.S.C.”) § 101 *et seq.*

14. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331, 1332, and 1338(a).

15. Defendants are subject to this Court’s specific and general personal jurisdiction consistent with the principles of due process and/or the Texas Long Arm Statute.

16. Defendants are registered with the Secretary of State to do business in the State of Texas. Defendants sell and offer to sell products and services throughout the State of Texas, including in this judicial district, and introduce infringing products and services into the stream of commerce knowing that they would be sold in the State of Texas and this judicial district.

17. Personal jurisdiction exists generally over Defendants because each Defendant has sufficient minimum contacts with the forum as a result of business conducted within the State of Texas and the Eastern District of Texas. Personal jurisdiction also exists over each Defendant because it, directly or through subsidiaries or intermediaries, makes, uses, sells, offers for sale, imports, advertises, makes available, and/or markets products within the State of Texas

and the Eastern District of Texas that infringe one or more claims of the '728 Patent, as alleged more particularly below.

18. Venue in this District is proper under 28 U.S.C. §§ 1400(b) and 1391(b)–(c) because each Defendant is subject to personal jurisdiction, resides and/or has a regular and established place of business, and has committed acts of infringement in this District. Each Defendant makes, uses, sells, offers to sell, and/or imports infringing products into and/or within this District, maintains a permanent and/or continuing presence within this District, and has the requisite minimum contacts with this District such that this venue is a fair and reasonable one. Upon information and belief, each Defendant has transacted and, at the time of the filing of the Complaint, is continuing to transact business within this District.

19. Defendants are properly joined under 35 U.S.C. § 299(a)(1) because, as set forth in greater detail below, Defendants commonly and/or jointly make, use, sell, offer to sell, and/or import infringing instrumentalities, such that at least one right to relief is asserted against Defendants jointly, severally, and in the alternative with respect to the same transactions, occurrences, or series of transactions or occurrences relating to the making, using, selling, offering to sell, and/or importing into the United States the same accused instrumentalities, as set forth in greater detail herein.

20. Defendants are properly joined under 35 U.S.C. § 299(a)(2) because, as set forth in greater detail below, Defendants make, use, sell, offer to sell in, and/or import into the United States the same or similar accused instrumentalities, such that questions of fact that are common to all Defendants will arise, as set forth in greater detail herein.

21. The '728 Patent was the subject of a prior litigation in this District, in *KAIFI LLC v. AT&T Inc., et al.*, Case No. 2:19-cv-00138-JRG (E.D. Tex.), making this action a “related”

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