

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

MOBILITY WORKX, LLC,

Plaintiff,

v.

AT&T INC., AT&T CORP.,
AT&T COMMUNICATIONS
LLC: AT&T MOBILITY LLC,
AND AT&T SERVICES INC.,

Defendants.

Case No. 4:23-cv-00594

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Mobility Workx, LLC (“Mobility Workx”) files this complaint against Defendants A&T Inc., AT&T Corp., AT&T Communications LLC, AT&T Mobility LLC, and AT&T Services Inc. (collectively, “Defendants” or “AT&T”) for infringement of U.S. Patents Nos. 7,697,508 (the “’508 Patent”), 8,213,417 (the “’417 Patent”), and 7,231,330 (the “’330 Patent”) (collectively the “Patents in Suit”).

I. PARTIES

1. Plaintiff Mobility Workx LLC is a Florida limited liability company that maintains its principal place of business at 215 Circle Drive, Winters, TX 79567.

2. Mobility Workx is the owner of U.S. Patent No. 7,697,508, entitled “System, Apparatus, and Methods for Proactive Allocation of Wireless Communication Resources,” issued April 13, 2010. A copy of the ‘508 patent is attached hereto as Exhibit 1.

3. Mobility Workx is the owner of U.S. Patent No. 8,213,417, entitled “System, Apparatus, and Methods for Proactive Allocation of Wireless Communication Resources,” issued July 3, 2012. A copy of the ‘417 patent is attached hereto as Exhibit 2.

4. Mobility Workx is the owner of U.S. Patent No. 7,231,330, entitled “Rapid Mobility Network Emulator Method and System,” issued June 12, 2007. A copy of the ‘330 patent is attached hereto as Exhibit 3.

5. On information and belief, Defendant AT&T Inc. is a Delaware corporation with its principal place of business at 208 S. Akard Street, Dallas, Texas, 75202. AT&T Inc.’s registered agent for service is CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

6. On information and belief, Defendant AT&T Corp. is a New York corporation with a principal place of business at One AT&T Way, Bedminster, New Jersey 07921-0752. AT&T Corp.’s registered agent for service is CT Corporation System, 28 Liberty Street, New York, New York, 10005.

7. On information and belief, Defendant AT&T Communications, LLC,

is a Delaware limited liability company with a principal place of business at 295 North Maple Ave., Basking Ridge, NJ 07920. AT&T Communications, LLC's registered agent is The Corporation Trust Company, 1209 N Orange St., Wilmington, DE 19801.

8. On information and belief, Defendant AT&T Mobility LLC is a Delaware limited liability company with its principal place of business at 1025 Lenox Park Boulevard NE, Atlanta, Georgia 30319. AT&T Mobility LLC's registered agent for service is The Corporation Trust Company, located at Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

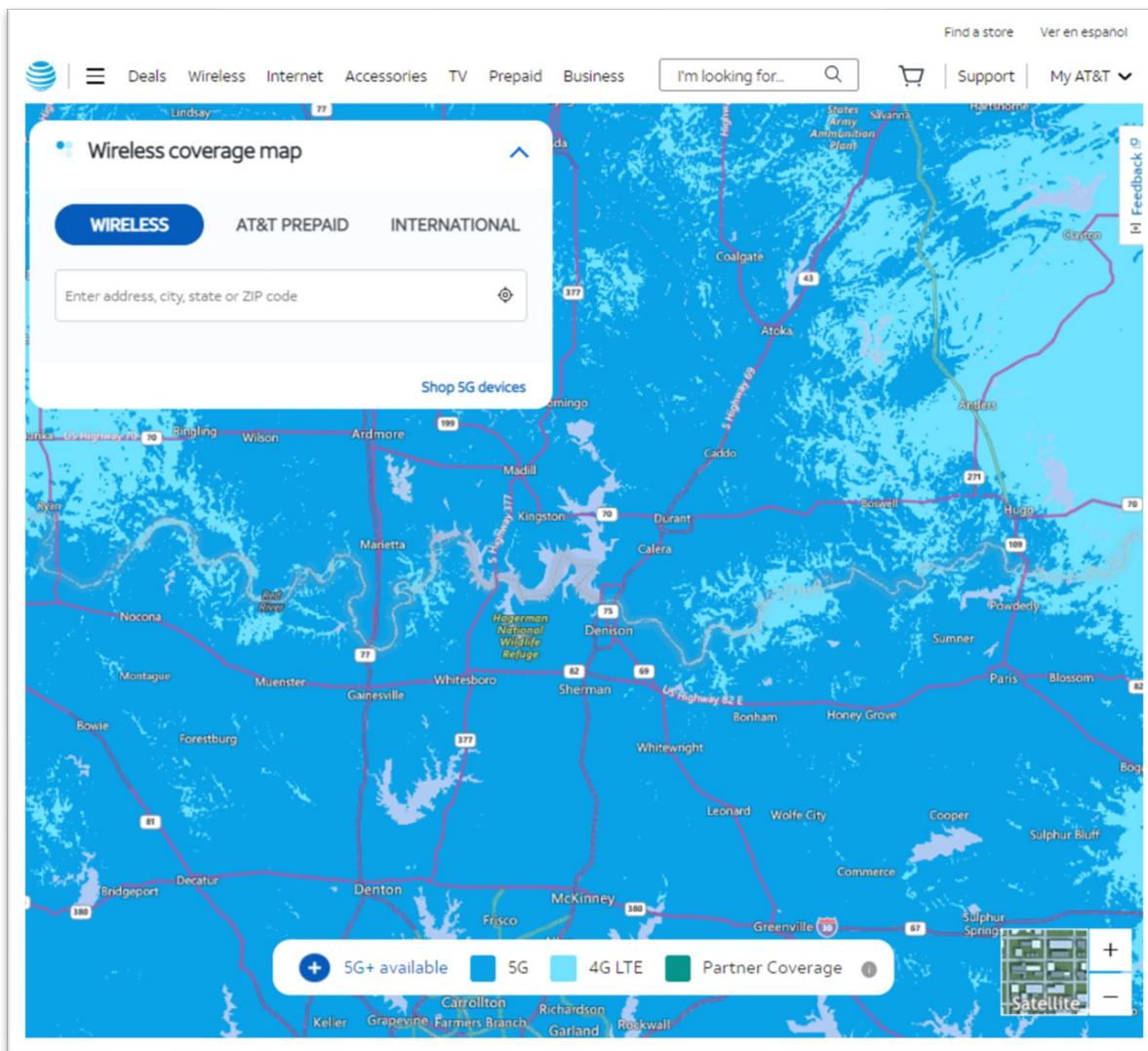
9. On information and belief, Defendant AT&T Services, Inc. is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 208 South Akard Street, Dallas, Texas 75202. AT&T Services, Inc.'s registered agent for service is CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

II. JURISDICTION AND VENUE

10. Mobility Workx's patent infringement claims arise under the patent laws of the United States, Title 35 of the United States Code. Accordingly, this Court has jurisdiction over the subject matter of this Complaint under 28 U.S.C. §§ 1331 and 1338(a).

11. On information and belief, AT&T's operations in the Eastern District

of Texas are substantial and varied. AT&T operates one or more wireless telecommunications networks to provide wireless telecommunications services, including within the Eastern District of Texas, under brand names including but not limited to “AT&T.” AT&T also advertises, as shown below¹, that its 5G and 4G LTE Nationwide networks are available within the Eastern District of Texas.



12. AT&T maintains multiple facilities in this judicial district, including

¹ Wireless Coverage Map, available at <https://www.att.com/maps/wireless-coverage.html> (last visited January 24, 2022)

numerous AT&T retail stores at 190 E Stacy Rd Suite 214, Allen, TX 75002; 1103 E Tyler St, Athens, TX 75751; 4460 Dowlen Rd, Beaumont, TX 77706; 351 TX-243 Suite 200, Canton, TX 75103; 2520 W University Dr Suite 1180, Denton, TX 76201; 3551 Preston Rd, Frisco, TX 75034; 1214 US-259 Suite 102, Kilgore, TX 75662; 318 N Main St Suite B, Lindale, TX 75771; 109 W Loop 281, Longview, TX 75605; 1712 E Grand Ave, Marshall, TX 75670; 3402 North St, Nacogdoches, TX 75965; 1335 S Broadway St Suite 10, Sulphur Springs, TX 75482; 5112 Summerhill Rd, Texarkana, TX 75503; and 4757 S Broadway Ave, Tyler, TX 75703. These stores are physical places within the district and are AT&T's regular and established places of business.

13. AT&T further maintains a foundry within this judicial district in Plano, Texas, “encompassing all aspects of an industry environment – from manufacturing to distribution to retail” and enabling AT&T's customers “to test potential 5G solutions.”² On information and belief, AT&T uses this foundry to design, test, use, offer to sell, and sell mobile network services and products that infringe the Patents in Suit. This foundry is a physical place within the district and is AT&T's regular and established place of business.

14. This Court has personal jurisdiction over AT&T because AT&T has

² AT&T Foundry Launches Innovation Space for Vertical Industries, Sept. 20, 2018, *available at* https://about.att.com/story/2018/plano_foundry.html (last visited January 24, 2022).

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