

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**HUAWEI TECHNOLOGIES CO., LTD.,  
HUAWEI DEVICE CO., LTD., and  
HUAWEI DIGITAL TECHNOLOGIES  
(CHENGDU) CO., LTD.**

Plaintiffs,

vs.

**VERIZON COMMUNICATIONS, INC.,  
CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS, and VERIZON BUSINESS  
NETWORK SERVICES, INC.**

Defendants.

**Civil Action No. 6:20-cv-00090**

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiffs Huawei Technologies Co. Ltd., Huawei Device Co., Ltd., and Huawei Digital Technologies (Chengdu) Co., Ltd. (collectively, “Huawei” or “Plaintiffs”) hereby allege as follows against Verizon Communications, Inc., Cellco Partnership d/b/a Verizon Wireless, and Verizon Business Network Services, Inc. (collectively “Verizon” or “Defendants”):

**THE PARTIES**

1. Plaintiff Huawei Technologies Co., Ltd. (“Huawei Technologies”) is a Chinese corporation with its principal place of business at Bantian, Longgang District, Shenzhen, People’s Republic of China.

2. Plaintiff Huawei Device Co., Ltd. (“Huawei Device”) is a Chinese corporation with its principal place of business at Songshan Lake Science and Technology Industrial Zone, Dongguan, Guangdong, People’s Republic of China.

3. Plaintiff Huawei Digital Technologies (Chengdu) Co., Ltd. (“Huawei Digital”) is a Chinese corporation with its principal place of business at No.1899 Xiyuan Avenue, High-tech Zone, Chengdu, Sichuan, People’s Republic of China.

4. Defendant Verizon Communications Inc. (“Verizon Communications”) is a Delaware corporation with a principal place of business at 1095 Avenue of the Americas, New York, New York 10036. Verizon Communications may be served through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

5. Defendant Cellco Partnership d/b/a Verizon Wireless (“Cellco Partnership”) is a Delaware partnership with its principal place of business at 1 Verizon Way, Basking Ridge, New Jersey 07920. Cellco Partnership is wholly owned by its corporate parent, Verizon Communications, and together with Verizon Communications is collectively referred to as “Verizon Wireless.” Cellco Partnership may be served through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

6. Defendant Verizon Business Network Services, Inc. (“Verizon Business”) is a Delaware corporation with a place of business in at least San Antonio, Texas. Verizon Business may be served through its registered agent for service of process in Texas at CT Corporation System, 1999 Bryan St., Suite 900, Dallas, Texas 75201.

#### **JURISDICTION AND VENUE**

7. This action arises under the patent laws of the United States, 35 U.S.C. § 1, et seq. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338.

8. The patents-at-issue in this action are U.S. Patent Nos. 7,965,709 (“the ’709 Patent”), 8,154,986 (“the ’986 Patent”), 10,027,693 (“the ’693 Patent”), 7,609,288 (“the ’288 Patent”), 9,521,366 (“the ’366 Patent”), 7,715,832 (“the ’832 Patent”), and 8,761,839 (“the ’839 Patent”) (collectively, the “Asserted Patents”).

9. The Court has personal jurisdiction over Verizon at least because it has continuous business contacts in the State of Texas and in this District. Verizon has engaged in business activities including transacting business in this District and purposefully directing its business activities, including the provision of infringing communications networks and services, and the use, marketing, sale or offer for sale of mobile devices and services, such as Verizon’s Smart Family Service and One Talk Service and Cisco’s Webex service in this District, and the sale or offer for sale of services and goods to this District to aid, abet, or contribute to the infringement of third parties in this District. For example, Verizon—either directly or through those acting on its behalf—offers infringing communications networks and services in this District, as shown, e.g., at <https://www.verizonwireless.com/featured/better-matters/>:

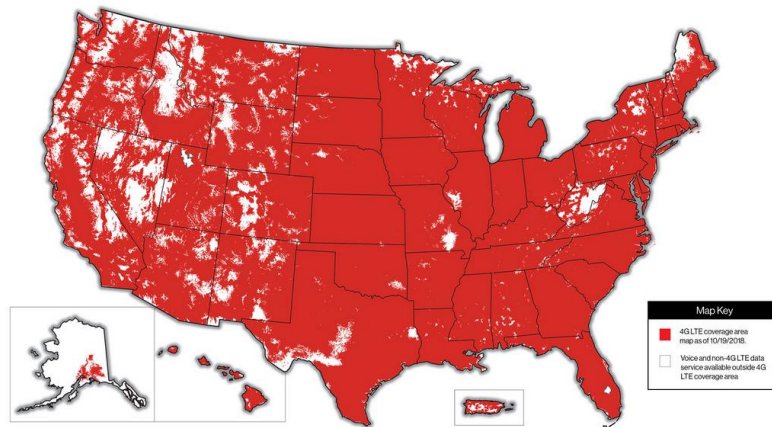
**We have coverage  
where it counts.**

**We cover  
326.5 million  
people**

**More than  
98% of the U.S.  
population**

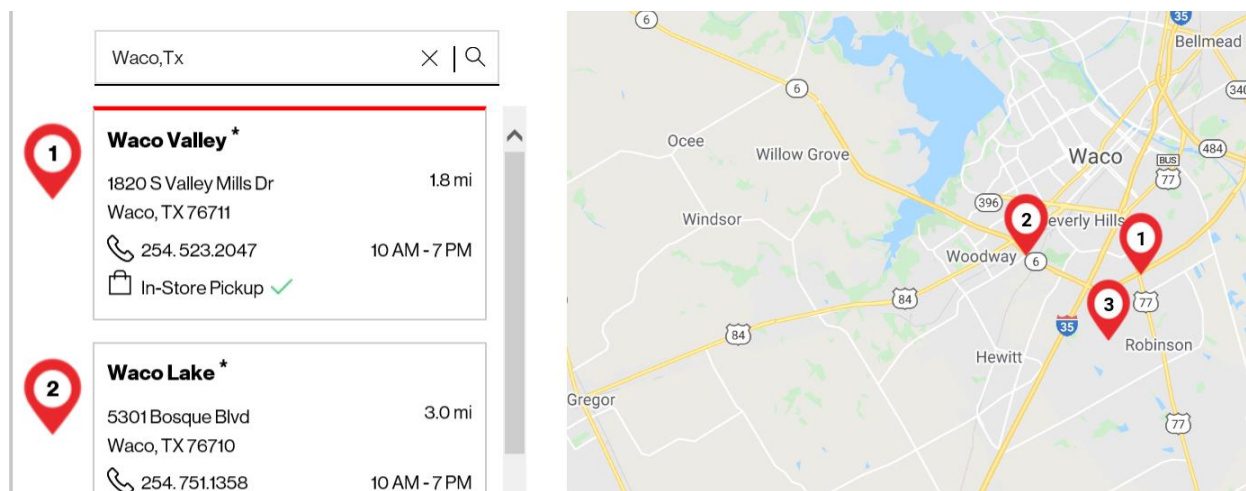
**More than  
2.56 million  
square miles**

Based on 9/15/2018 U.S. Census population data.  
Verizon’s 4G LTE service is available to more than 326  
million people in the U.S.



As another example, Verizon—either directly or through those acting on its behalf—has stores and/or authorized retailers in this District in which infringing communications networks and services are offered for sale. See <https://www.verizonwireless.com/stores/texas/>. For example,

Verizon through each of the named parties has various places of business within this District, including data centers at 222 Rotary, San Antonio, TX, 78202 and 2525 Ridgepoint Drive, Austin TX, 78754, and numerous retail stores including the following examples in Waco:



<https://www.verizonwireless.com/stores/storesearchresults/?lat=31.549333&long=-97.14666950000003&q=waco%2Ctx#/Search>. Verizon also has a call center in El Paso. See <https://www.verizon.com/about/careers/we-are-global#featured-region-6753>. Verizon also offers enterprise products and services to Texas “[s]tate agencies, cities, counties, public school districts, and universities” through the Texas Department of Information Resources in Austin. See, e.g., <https://enterprise.verizon.com/solutions/public-sector/state-local/contracts/texas/>; <https://dir.texas.gov/>; see also <https://www.marketwatch.com/press-release/verizon-invested-more-than-348-million-in-texas-wireline-telecommunications-infrastructure-in-2013-2014-03-31> (“Verizon Enterprise Solutions oversees all of Verizon’s solutions for large-business and government customers in Texas and globally . . .”).

10. Venue is proper in this judicial district under 28 U.S.C. §§ 1391 and 1400(b). As shown above, Verizon has multiple regular and established place of business in this District and is engaged in activities including: transacting business in this district and purposefully directing

its business activities, including the installation, maintenance, and use of infringing communications networks, services, and other technologies in this District, and the sale or offer for sale of services and goods to this District to aid, abet, or contribute to the infringement of third parties in this District.

### **HUAWEI'S INNOVATION AND RESEARCH**

11. Founded in 1987, Huawei is a global leader of information and communication technology (“ICT”) solutions. Continuously innovating to meet customer needs, Huawei is committed to enhancing customer experience and creating maximum value for telecommunications carriers, enterprises, and consumers. Huawei’s telecom network equipment, IT products and solutions, and smart devices, such as telepresence products, transport and core network equipment, fixed and radio access products, and fiber infrastructure products are deployed and used in 170 countries and regions and serve over one-third of the world’s population. Huawei is also a leader in research, innovation, and implementation of future networks.

12. Indeed, R&D has been at the core of Huawei’s business. Huawei started its business reselling third-party telecommunication products, but shortly thereafter Huawei chose to shift its focus by expanding its own R&D and developing its own products. Since then, Huawei has heavily invested in R&D and routinely spends no less than 10% of its annual revenue on innovation. For example, Huawei ranks fifth globally in *The 2019 European Union Industrial R&D Investment Scoreboard*, a report published by the European Commission.

13. Over the past decade through 2018, Huawei has invested nearly \$73 billion in research and development in total. In the next five years, Huawei plans to invest \$100 billion. Huawei’s R&D efforts are now focused on addressing customer needs, as well as long-term technology research and standardization. In pursuit of these goals, Huawei has assembled a

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