

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

GREATGIGZ SOLUTIONS, LLC,

Plaintiff

v.

LINKEDIN CORPORATION,

Defendant

Case No. 6:20-cv- 00545

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

GreatGigz Solutions, LLC (“Plaintiff”) hereby files this Original Complaint for Patent Infringement against LinkedIn Corporation (“Defendant”), and alleges, upon information and belief, as follows:

THE PARTIES

1. GreatGigz Solutions, LLC is a limited liability company organized and existing under the laws of the State of Florida with its principal place of business at 600 S. Dixie Highway, Suite 605, West Palm Beach, Florida 33401.
2. Upon information and belief, LinkedIn Corporation (“LinkedIn”) is a domestic corporation organized and existing under the laws of Delaware, with a principal place of business located in Sunnyvale, California. LinkedIn may be served through its registered agent in the State of Texas at Corporation Service Company, 211 East 7th Street, Suite 620, Austin, Texas 78701. On information and belief, LinkedIn sells and offers to sell products and services throughout the State of Texas, including in this judicial District, and introduces services via its infringing

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

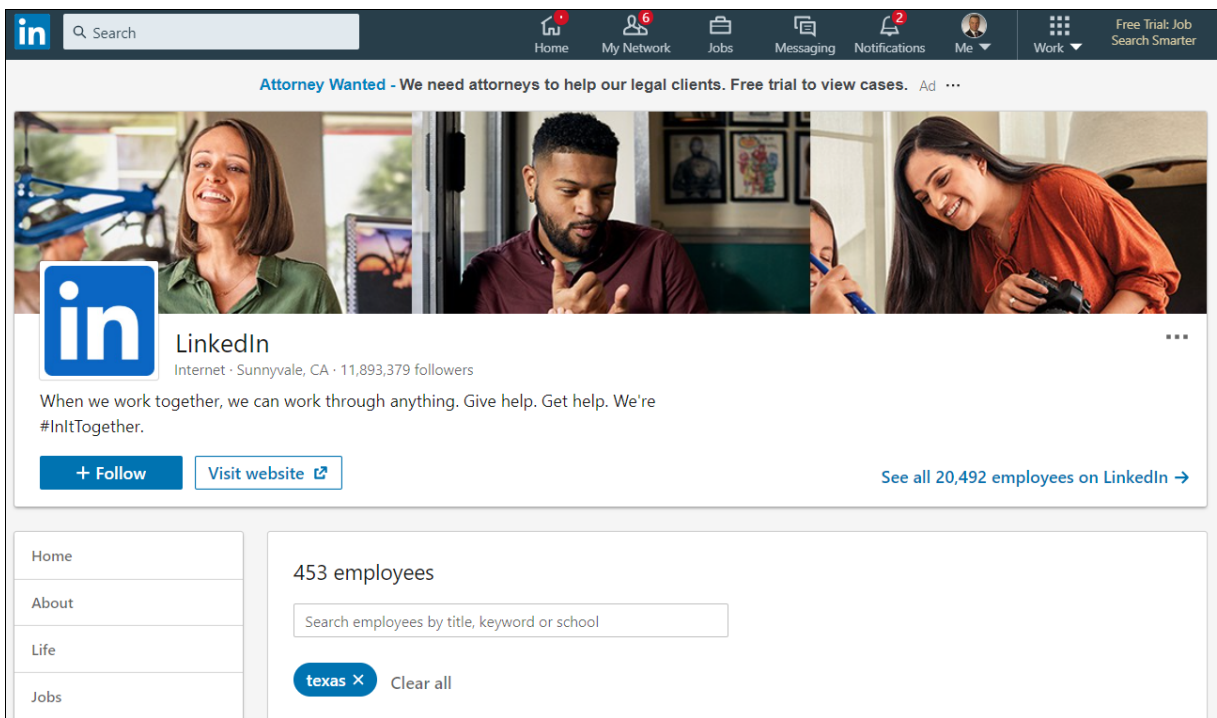
systems into the stream of commerce knowing and intending that they would be extensively used in the State of Texas and in this judicial District. On information and belief, LinkedIn specifically targets customers in the State of Texas and in this judicial District.

JURISDICTION AND VENUE

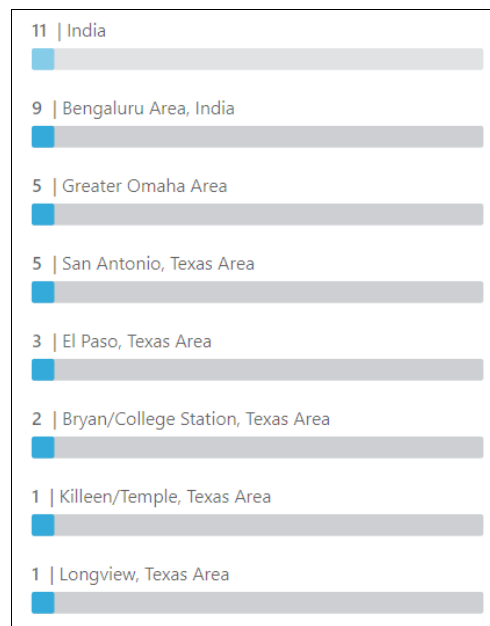
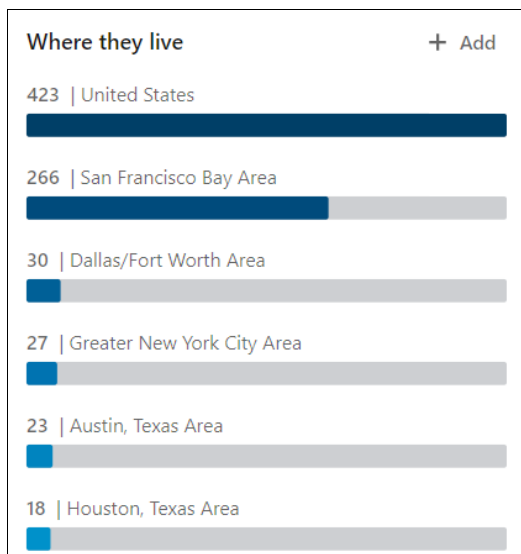
3. This Court has subject matter jurisdiction over this case under 28 U.S.C. §§ 1331 and 1338.
4. This Court has personal jurisdiction over Defendant. Defendant has continuous and systematic business contacts with the State of Texas. Defendant directly conducts business extensively throughout the State of Texas, by distributing, making, using, offering for sale, selling, and advertising (including the provision of interactive web pages and apps) its services in the State of Texas and in this District. Defendant has purposefully and voluntarily made its infringing systems available to residents of this District and into the stream of commerce with the intention and expectation that they will be purchased and used by consumers in this District.
5. On information and belief, Defendant maintains an ongoing and continuous business presence in the State of Texas and specifically within this District, which is illustrated by the fact that LinkedIn has 82 employees residing in Texas, with half of those residing and working in this District. *See, e.g.*, LinkedIn corporate profile page on LinkedIn.com, which lists the location of 453 LinkedIn employees worldwide (including 23 in Austin; 5 in San Antonio; 3 in El Paso; and 1 in Killeen/Temple; plus 30 in Dallas/Ft. Worth; 18 in Houston; 2 in Bryan/College Station; and 1 in Longview). Indeed, nearly 20% of all LinkedIn employees listed reside in the State of Texas, and nearly 10% reside in this District alone. Further, on information and belief, LinkedIn maintains substantial long-term data centers in the State of Texas. On information and belief, such data centers are under the direct control of LinkedIn and are fundamental elements of the infringing system operated by LinkedIn to directly infringe the asserted claims. *See, e.g.*,

Business Article “LinkedIn Expands With Texas Data Center,” excerpted below, available at: <https://www.datacenterknowledge.com/archives/2013/11/06/linkedin-expands-with-dallas-data-center>.¹

6. The data center location in Texas is strategic and represents an important business advantage to LinkedIn’s business model. *See, e.g.,* LinkedIn Engineering Blog, excerpted below, and available at: <https://engineering.linkedin.com/blog/2015/11/introducing-linkedins-west-coast-data-center>.



¹ All references to Internet content, unless noted otherwise, are cited as of June 10, 2020, and as accessed from a location in the State of Texas.



LinkedIn Expands With Texas Data Center

LinkedIn, the social network for business, continues to expand its data center infrastructure to support its rapid growth. The company signed a \$116 million, 11-year lease for a large chunk of data center space in Dallas.

Rich Miller | Nov 06, 2013

When our new Hillsboro data center goes online in 2016, we will realize our goal of establishing three regionally diverse data centers within the US. With our other two locations in Virginia and Texas, it was logical to plan our third location on the West Coast. We explored multiple locations and providers, ultimately choosing the Oregon location and [Infomart](#) as our provider.

7. The location of the LinkedIn data center in Texas is important to the business of LinkedIn, as explained in the LinkedIn Engineering Article entitled: “A Brief History of Scaling LinkedIn,” at: <https://engineering.linkedin.com/architecture/brief-history-scaling-linkedin> (excerpted below). The LinkedIn article explains how the use of “geographically close data centers”

facilitates and enhances the effectiveness of LinkedIn's business model for the benefit of its customers.

Multi-Data Center

Being a global company with a fast growing member population, we needed to scale beyond serving traffic [from one data center](#). We began an effort years ago to address this, first by serving public profiles out of two data centers (Los Angeles and Chicago). Once proven, we embarked on enhancing all our services to handle data replication, callbacks from different origins, one-way data replication events, and pinning users to a geographically close data center.

Many of our databases run on [Espresso](#) (a new in-house multi-tenant datastore). Espresso was built with multi data centers in mind. It provides master / master support and handles much of the difficult replication.

Multiple data centers are incredibly important to maintain "site-up" and high availability. You need to avoid any single point of failure not just for each individual service, but the entire site. Today, LinkedIn runs out of three main data centers, with additional [PoPs](#) around the globe.

8. Venue is proper in the Western District of Texas as to Defendant pursuant to at least 28 U.S.C. §§ 1391(c)(2) and 1400(b). As noted above, Defendant maintains a regular and established business presence in this District.

PATENTS-IN-SUIT

9. GreatGigz Solutions, LLC is the owner, by assignment, of U.S. Patent Nos. 6,662,194 ("the '194 Patent"); 7,490,086 ("the '086 Patent"); 9,760,864 ("the '864 Patent"); and 10,096,000 ("the '000 Patent") (hereinafter collectively referred to as "the GGS Patents").
10. The GGS Patents are valid, enforceable, and were duly issued in full compliance with Title 35 of the United States Code.
11. The inventions described and claimed in the GGS Patents were invented by Raymond Anthony Joao.
12. The priority date of each of the GGS Patents is at least as early as July 31, 1999.

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