

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

GREATGIGZ SOLUTIONS, LLC,

Plaintiff

v.

LYFT, INC.,

Defendant

Case No. 6:20-cv-651

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

GreatGigz Solutions, LLC (“Plaintiff”) hereby files this Original Complaint for Patent Infringement against Lyft, Inc. (“Lyft” or “Defendant”), and alleges, on 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. On information and belief, Lyft, Inc. is a foreign for-profit corporation organized and existing under the laws of the State of Delaware, with a principal place of business in the State of California. Lyft may be served through its registered agent in the State of Texas at CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201. On information and belief, Lyft sells and offers to sell products and services throughout the State of Texas, including in this judicial District, and introduces services via its infringing systems into the stream of

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

commerce knowing and intending that they would be extensively used in the State of Texas and in this judicial District. On information and belief, Lyft 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 Mobile Applications) 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. On information and belief, Lyft: (i) employs more than 2 Million Independent Contractors; (ii) has completed more than 1 Billion rides; (iii) claims a 30% market share in the United States; and (iv) is valued at nearly \$10 Billion. *See* <https://www.businessofapps.com/data/lyft-statistics/>.¹
5. On information and belief, Lyft maintain a substantial and continuous business presence in this District, including an ongoing presence in Austin, Texas at 1021 East 7th Street, Suite 101, 78702. In addition, on information and belief, Lyft maintains multiple Lyft Drivers Centers in this District which, on information and belief, are locations at which it provides services to Lyft Drivers. *See* below. The Lyft Drivers Centers are located in this District, at 6375 US Highway

¹ All references to Internet content, unless noted otherwise, are cited as of July 16, 2020, and as accessed from a location in the State of Texas.

290, Austin, Texas 78723, and at 8610 Broadway Street, Suite 260, San Antonio, Texas 78217.

See below.



See Google Map Image of Lyft Business Presence at 1021 East 7th Street, Suite 101, Austin, Texas.

Austin

Driver Center

This location is now open.

Drivers are encouraged to schedule an [appointment](#) for support or service. Scheduling an appointment is strongly recommended. Walk-ins are still accepted but wait times may vary.

Note: Our in-person support locations no longer accept Lost and Found drop-offs. To learn what to do if you find an item in your car, check out our [Help Center](#).

Address

[6375 US-290 Austin, TX, 78723](#)

Operating Hours

Monday-Friday, 9 AM-5 PM

See Lyft Hub Locator, at <https://www.lyft.com/hub/hours/texas>.

San Antonio

Express Drive

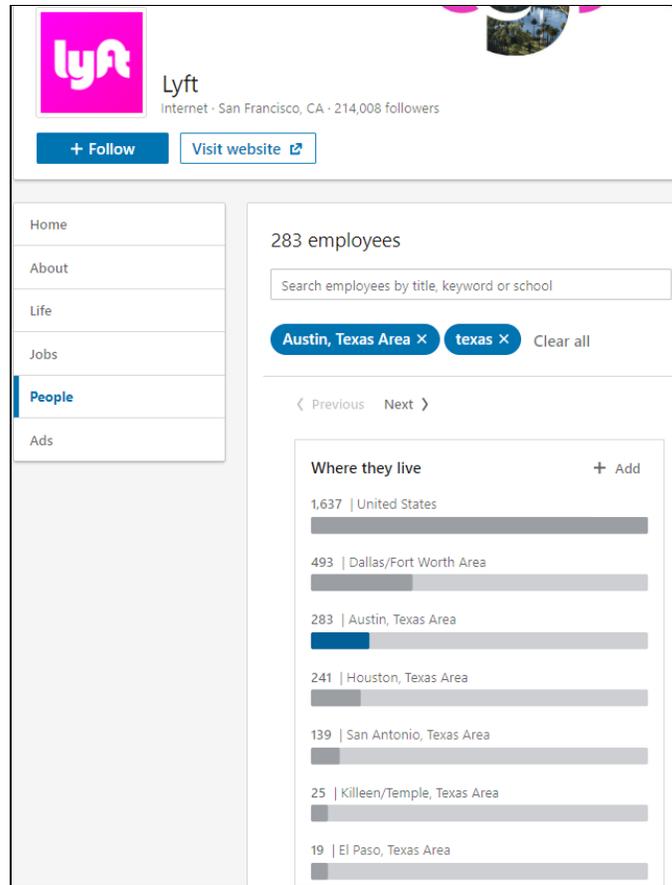
This location is now open.

Address
[8610 Broadway St, Suite 260, San Antonio, TX 78217](#)

Operating Hours
Monday-Friday, 9 AM-5 PM

See Lyft Hub Locator, at <https://www.lyft.com/hub/hours/texas>.

6. 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 Lyft has 283 employees residing in the Austin, Texas area and within this District. See Lyft corporate profile page on LinkedIn.com, which lists the location of Lyft employees worldwide, and specifically lists 283 such individual employees in the Austin, Texas area. Among those employees are upper level individuals holding the following titles: (i) Operations Manager; (ii) Senior Manager; (iii) Regional Fleet Manager; (iv) Operations Lead; (v) Data Scientist; (vi) Fleet Operations Lead; and (vii) Analytics / Fraud, Risk & Strategy. In addition to Austin, on information and belief, Lyft employs 139 individuals in San Antonio, 25 in Killeen/Temple, 19 in El Paso, and 14 in Waco, all of which are located in this judicial District. See <https://www.linkedin.com/company/lyft/people/?facetGeoRegion=us%3A64&keywords=texas>.



- 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

- 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”).
- The GGS Patents are valid, enforceable, and were duly issued in full compliance with Title 35 of the United States Code.
- The inventions described and claimed in the GGS Patents were invented by Raymond Anthony Joao.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.