

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

GREATGIGZ SOLUTIONS, LLC,

Plaintiff

v.

UBER TECHNOLOGIES, INC.,

Defendant

Case No. 6:20-cv-00652

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

GreatGigz Solutions, LLC (“Plaintiff”) hereby files this Original Complaint for Patent Infringement against Uber Technologies, Inc. (“Uber” 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, Uber Technologies, 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. Uber 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, Uber 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, Uber 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, Uber: (i) employs more than 5 Million Independent Contractors; (ii) completes more than 18 Million rides per day; (iii) claims a 65% market share in the United States; and (iv) is valued at more than \$50 Billion. *See* <https://www.businessofapps.com/data/uber-statistics/>.¹
5. On information and belief, Uber maintains a substantial and continuous business presence in this District, including Uber “Green Light” Service Centers in Austin and San Antonio. On information and belief, such Centers are located at: (i) 507 Calles Street, Suite 120, Austin, Texas 78702; and (ii) 121 Interpark Blvd., Suite 501, San Antonio, Texas 78216. *See* below. On information and belief, the Uber Green Light Centers are locations in which users of the Uber infringing apparatus can: (i) apply to drive as an Independent Contractor for Uber; (ii) obtain

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.

assistance with Uber documents; and (iii) ask questions about an Uber account. *See, e.g.,* <https://www.hyrecar.com/blog/uber-greenlight-hub/>.



See Google Map Image of Uber Green Light Center at 507 Calles Street, Suite 120, Austin, Texas.

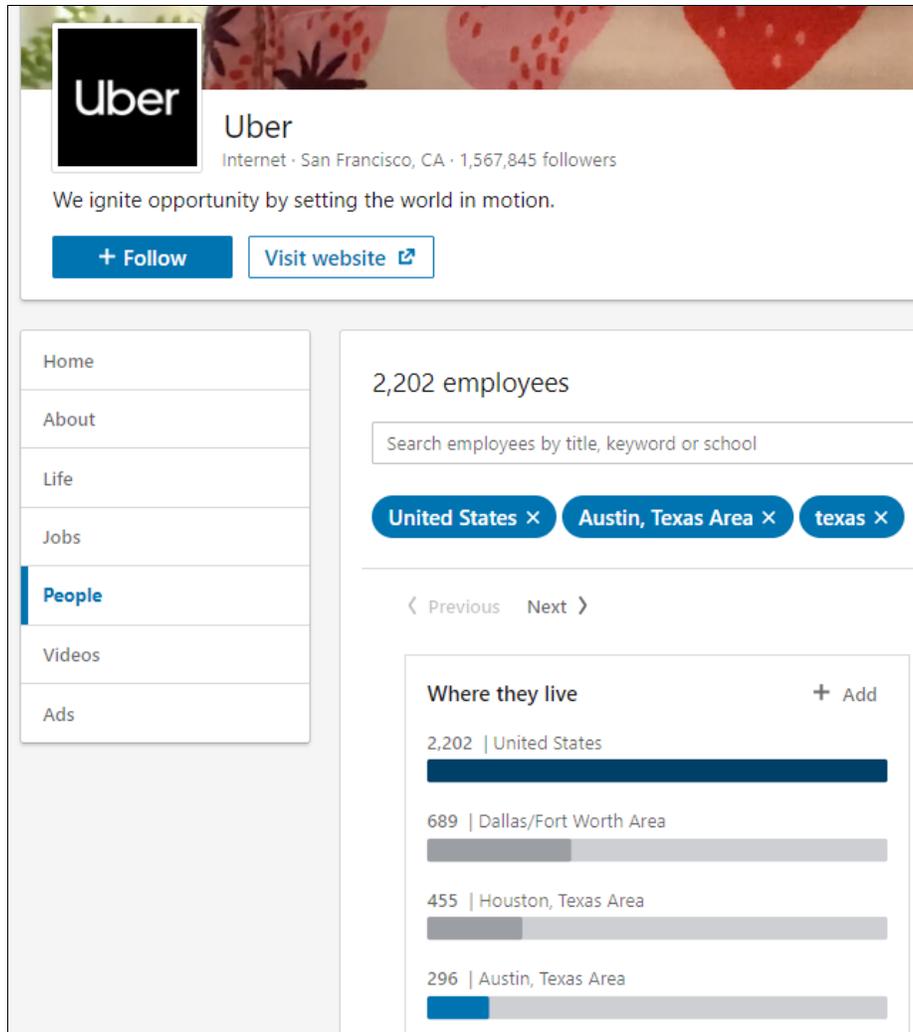


See Google Map Image of Uber Green Light Center at 121 Interpark Blvd., Suite 501, San Antonio, Texas.

6. Further on information and belief, Uber maintains a substantial business presence in this District in the form of its 17,000 square foot high-end office space in downtown Austin at 201 East 3rd

Street. On information and belief, the Austin headquarters is the location from which Uber operations across seven states are managed (including Texas, Oklahoma, Louisiana, Colorado, Kansas, Missouri, and Utah). *See* <https://www.statesman.com/BUSINESS/20180302/Uber-doubles-Austin-workforce-as-part-of-Texas-expansion>.

7. 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 Uber has 296 employees residing in the Austin, Texas area and within this District. *See* Uber corporate profile page on LinkedIn.com, which lists the location of Uber employees worldwide, and specifically lists 296 such individual employees in the Austin, Texas area. Among those employees are upper level individuals holding the following titles: (i) General Manager; (ii) Regional General Manager; (iii) Head of Uber Eats Sales – US; (iv) Head of Strategic Partnerships; (v) Sales Management; (vi) Account Executive; and (vii) Sales Manager – Talent Acquisition. *See* <https://www.linkedin.com/company/uber-com/people/?facetGeoRegion=us%3A0%2Cus%3A64&keywords=texas>



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.

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