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

LINFO IP, LLC,	)	
Plaintiff,	)	
	)	**Civil Action No. 6:21-cv-01074**
v.	)	
	)	
CVS PHARMACY, INC.,	)	
Defendant.	)	**JURY TRIAL DEMANDED**

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Linfo IP, LLC ("Linfo") files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of 9,092,428 ("the '428 patent") (referred to as the "Patent-in-Suit") by CVS Pharmacy, Inc. ("CVS").

I.   THE PARTIES

1.   Plaintiff Linfo is a Texas Limited Liability Company with its principal place of business located in Travis County, Texas.

2.   On information and belief, CVS is a corporation existing under the laws of the State of Delaware, with a regular and established place of business located at 820 S.5Th Street Waco, TX 76706. On information and belief, CVS sells and offers to sell products and services throughout Texas, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in Texas and this judicial district. CVS may be served through its registered agent C T Corporation System 1999 Bryan St., Ste. 900, Dallas, TX 75201   or anywhere thay may be found.

II.   JURISDICTION AND VENUE

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3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

4. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of Texas and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of Texas and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of Texas and in this judicial district.

5. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District. Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in Texas and this District.

III.   INFRINGEMENT

A. Infringement of the '428 Patent

6. On September 20, 2016, U.S. Patent No. 9,092,428 ("the '428 patent", attached as Exhibit A) entitled "System, methods and user interface for discovering and presenting information in text content" was duly and legally issued by the U.S. Patent and Trademark Office. Linfo IP, LLC owns the '428 patent by assignment.
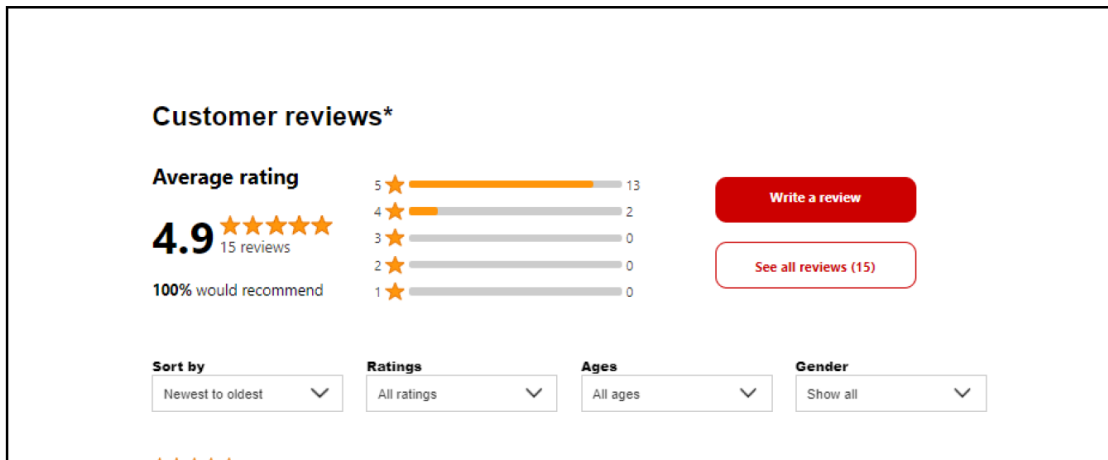
7.   The '428 patent relates to a novel and improved methods and apparatuses for conducting electronic commerce.

8.   CVS maintains, operates, and administers systems that facilitate discovering and presenting information in text content with different view formats that infringes one or more claims of the '428 patent, including one or more of claims 1-20, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the '428 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant's procurement of monetary and commercial benefit from it.

9.   Support for the allegations of infringement may be found in the following preliminary table:

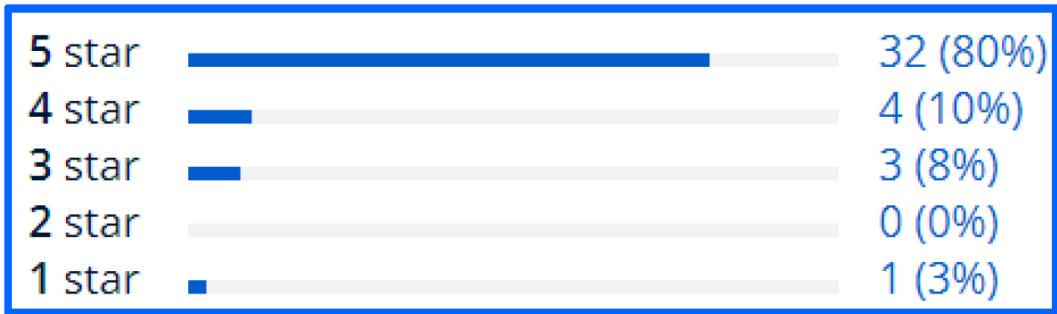| 1. A computer-assisted method for discovering information in a text content and extracting and presenting the information, comprising:	For Example: CVS's web site has an interactive product review section that allows customers to filter reviews from high to low.

PREPARATION H Hemorrhoid Symptom Treatment Suppositories, Burning, Itching and Discomfort Relief - CVS Pharmacy

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obtaining, by a computer system, a text content comprising one or more words or phrases or sentences, each being a term or an instance of a term;	For Example: The customer clicks on the review for PREPARATION H Hemorrhoid Symptom Treatment Suppositories on the CVS web site and 5-star, 4-star, 3-star 2-star and 1-star text reviews pop up.

5 star ━━━━━━━━━━━ 32 (80%)
4 star ━ 4 (10%)
3 star ━ 3 (8%)
2 star   0 (0%)
1 star ▪ 1 (3%)

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