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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 TIR TECHNOLOGIES LIMITED,
11 Plaintiff,

12 v.

13 META PLATFORMS, INC.,
14 Defendant.
15
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Case No. 8:25-cv-2345

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

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18 This is an action for patent infringement arising under the Patent Laws of the
19 United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Tir Technologies
20 Limited (“Plaintiff” or “Tir”) makes the following allegations against Defendant
21 Meta Platforms, Inc. (“Defendant” or “Meta”):

22 **INTRODUCTION**

23 1. This complaint arises from Defendants’ unlawful infringement of the
24 following United States patents owned by Plaintiff, which relate to improvements in
25 processing devices and systems: United States Patent Nos. 8,792,347 (“the ’347
26 Patent”), 9,800,633 (“the ’633 Patent”), and 10,484,442 (“the ’442 Patent”)
27 (collectively, the “Asserted Patents”).
28

1 **PARTIES**

2 2. Plaintiff Tir Technologies Limited is a private company limited by
3 shares organized and existing under the laws of Ireland, with its principal place of
4 business at The Hyde Building, Suite 23, The Park, Carrickmines, Dublin 18,
5 Ireland. Tir is the sole owner by assignment of all rights, title, and interest in the
6 Asserted Patents, including the right to recover damages for past, present, and future
7 infringement.

8 3. On information and belief, Defendant Meta Platforms, Inc. is a
9 Delaware corporation, with a principal place of business at 1 Meta Way, Menlo Park,
10 CA 94025. Meta may be served via its registered agent, Corporation Service
11 Company, located at 2710 Gateway Oaks Drive, Suite 150N, Sacramento, California
12 95833.

13 **JURISDICTION AND VENUE**

14 4. This action arises under the patent laws of the United States, Title 35 of
15 the United States Code. This Court has original subject matter jurisdiction pursuant
16 to 28 U.S.C. §§ 1331 and 1338(a).

17 5. This Court has personal jurisdiction over Meta in this action because
18 Meta is a corporation that maintains its principal place of business in the State of
19 California and thus is a resident of California. On information and belief, Meta
20 maintains offices and directs business activities from offices within the state of
21 California, including offices in Orange County and Los Angeles County within this
22 judicial district. Meta has committed acts within this District giving rise to this
23 action and has established minimum contacts with this forum such that the exercise
24 of jurisdiction over Meta would not offend traditional notions of fair play and
25 substantial justice. Meta, directly and through subsidiaries or intermediaries, has
26 committed acts of infringement in this District and elsewhere in the United States
27 by, among other things, making, using, importing, offering to sell, and/or selling
28 products and/or services that infringe the Asserted Patents.

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INFRINGEMENT OF U.S. PATENT NO. 8,792,347

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1 United States the Accused Products and Services, Defendant has injured Plaintiff and
2 is liable for infringement of the '347 Patent pursuant to 35 U.S.C. § 271(a).

3 10. The Accused Products and Services satisfy all claim limitations of one
4 or more claims of the '347 Patent. A claim chart comparing exemplary independent
5 claim 1 of the '347 Patent to representative Accused Products and Services is attached
6 as Exhibit 2.

7 11. Defendant knowingly and intentionally induced infringement, and
8 continues to do so, of one or more claims of the '347 Patent in violation of 35 U.S.C.
9 § 271(b) by encouraging, instructing, or otherwise facilitating customers and end
10 users to use the Accused Products and Services, in a manner that directly infringes
11 the claimed method, literally and/or under the doctrine of equivalents, with knowledge
12 of the '347 Patent and intent that such infringement occur. At least as of the filing and
13 service of this Complaint, Defendant has knowledge of the '347 Patent and the
14 infringing nature of the Accused Products and Services through, for example, the '347
15 Patent claim charts served herewith. At present, Plaintiff does not allege that
16 Defendant induced infringement of the '347 Patent in violation of 35 U.S.C. § 271(b)
17 prior to the filing and service of this Complaint.

18 12. Despite this knowledge of the '347 Patent, Defendant continues actively
19 encouraging and instructing its customers and end users (for example, through online
20 instruction materials on its website and materials cited in Exhibit 2) to use the
21 Accused Products and Services in ways that directly infringe the '347 Patent. For
22 example, Defendant advertises the use of Facebook as a video streaming platform.
23 *See* Ex. 3 ([https://www.facebook.com/help/](https://www.facebook.com/help/1468879913412530/?helpref=related_articles)
24 [1468879913412530/?helpref=related_articles](https://www.facebook.com/help/1468879913412530/?helpref=related_articles), "Watch live videos on Facebook");
25 Ex. 4 (https://www.facebook.com/help/401287967326510?helpref=popular_articles,
26 "Watching Shows and Videos"). Further, Defendant provides Facebook users with
27 instructions and user guides detailing how to setup, configure, and use the Accused
28 Products and Services to utilize the infringing functionality. *See* Ex. 5

(<https://www.facebook.com/help/569371393126980/>, “Post or edit a video on your Facebook Page”); Ex. 6 (<https://www.facebook.com/help/587160588142067/>, “Go live on Facebook using streaming software”). Defendant provides these instructions, and other materials, knowing and intending (or with willful blindness to the fact) that Facebook users will commit these infringing acts. Defendant also continues to make, use, offer for sale, sell, and/or import the Accused Products and Services, despite its knowledge of the ’347 Patent, thereby specifically intending for and inducing Facebook users to infringe the ’347 Patent through the users’ normal and customary use of the Accused Products and Services.

13. Defendant has also knowingly contributed to the infringement, and continues to do so, of one or more claims of the ’347 Patent in violation of 35 U.S.C. § 271(c) by selling, offering for sale, or importing into the United States, the Accused Products and Services, knowing that the Accused Products and Services constitute a material part of the inventions claimed in the ’347 Patent, are especially made or adapted to infringe the ’347 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use. At least as of the filing and service of this Complaint, Defendant has knowledge of the ’347 Patent and the infringing nature of the Accused Products and Services through, for example, the ’347 Patent claim charts served herewith. For example, the accused traffic monitoring features constitute a material part of the inventions claimed in the ’347 Patent, are especially made or adapted to infringe the ’347 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use, as demonstrated by the evidence in Exhibit 2. At present, Plaintiff does not allege that Defendant contributed to infringement of the ’347 Patent in violation of 35 U.S.C. § 271(c) prior to the filing and service of this Complaint.

14. On information and belief, Plaintiff (including its predecessors and any licensees) complied with 35 U.S.C. § 287 with respect to the asserted system claims of the ’347 Patent during the relevant time period because Plaintiff, any predecessor

1 assignees to the '347 Patent, and any licensees did not make, offer for sale, or sell
2 products that practice(d) the '347 Patent during the relevant time period or were not
3 required to mark during the relevant time period.

4 15. As a result of Defendant's direct infringement of the '347 Patent,
5 Plaintiff is entitled to monetary damages (past, present, and future) in an amount
6 adequate to compensate for Defendant's infringement, but in no event less than a
7 reasonable royalty for the use made of the invention by Defendant, together with
8 interest and costs as fixed by the Court.

9 16. As a result of Defendant's indirect infringement of the '347 Patent,
10 Plaintiff is entitled to monetary damages (present and future) in an amount adequate
11 to compensate for Defendant's infringement, but in no event less than a reasonable
12 royalty for the use made of the invention by Defendant, together with interest and
13 costs as fixed by the Court, accruing as of the time Defendant obtained knowledge of
14 the '347 Patent.

15 **COUNT II**

16 **INFRINGEMENT OF U.S. PATENT NO. 9,800,633**

17 17. Plaintiff realleges and incorporates by reference the foregoing
18 paragraphs as if fully set forth herein.

19 18. Plaintiff owns by assignment all rights, title, and interest, including the
20 right to recover damages for past, present, and future infringement, in U.S. Patent No.
21 9,800,633, titled "Just-in-time distributed video cache." The '633 Patent was duly
22 and legally issued by the United States Patent and Trademark Office on October 24,
23 2017. The '633 Patent is valid and enforceable. A true and correct copy of the '633
24 Patent is attached hereto as Exhibit 7.

25 19. Upon information and belief, Defendant has directly infringed and
26 continues to directly infringe under 35 U.S.C. §§ 271 (a), literally and/or under the
27 doctrine of equivalents, one or more claims of U.S. Patent No. 9,800,633, including
28 at least claim 1, by performing each step of the claimed method and/or by directing

1 or controlling the performance of such steps by third parties. Defendant offers,
2 provides, maintains, operates, and administers selective traffic monitoring services,
3 including without limitation through Facebook, in a service provider network that
4 performs the steps of the claimed method either directly through its own actions,
5 through the operation of equipment under its control, or through customers acting
6 under conditions established and orchestrated by Defendant (the “Accused Products
7 and Services”). By making, using, offering for sale, selling and/or importing into the
8 United States the Accused Products and Services, Defendant has injured Plaintiff and
9 is liable for infringement of the ’633 Patent pursuant to 35 U.S.C. § 271(a).

10 20. The Accused Products and Services satisfy all claim limitations of one
11 or more claims of the ’633 Patent. A claim chart comparing exemplary independent
12 claim 1 of the ’633 Patent to representative Accused Products and Services is attached
13 as Exhibit 8.

14 21. Defendant knowingly and intentionally induced infringement, and
15 continues to do so, of one or more claims of the ’633 Patent in violation of 35 U.S.C.
16 § 271(b) by encouraging, instructing, or otherwise facilitating customers and end
17 users to use the Accused Products and Services, in a manner that directly infringes
18 the claimed method, literally and/or under the doctrine of equivalents, with knowledge
19 of the ’633 Patent and intent that such infringement occur. At least as of the filing and
20 service of this Complaint, Defendant has knowledge of the ’633 Patent and the
21 infringing nature of the Accused Products and Services through, for example, the ’633
22 Patent claim charts served herewith. At present, Plaintiff does not allege that
23 Defendant induced infringement of the ’633 Patent in violation of 35 U.S.C. § 271(b)
24 prior to the filing and service of this Complaint.

25 22. Despite this knowledge of the ’633 Patent, Defendant continues actively
26 encouraging and instructing its customers and end users (for example, through online
27 instruction materials on its website and materials cited in Exhibit 8) to use the
28 Accused Products and Services in ways that directly infringe the ’633 Patent. For

1 example, Defendant advertises the use of Facebook as a video streaming platform.
2 *See* Ex. 3 ([https://www.facebook.com/help/](https://www.facebook.com/help/1468879913412530/?helpref=related_articles)
3 [1468879913412530/?helpref=related_articles](https://www.facebook.com/help/1468879913412530/?helpref=related_articles), “Watch live videos on Facebook”);
4 Ex. 4 (https://www.facebook.com/help/401287967326510?helpref=popular_articles,
5 “Watching Shows and Videos”). Further, Defendant provides Facebook users with
6 instructions and user guides detailing how to setup, configure, and use the Accused
7 Products and Services to utilize the infringing functionality. *See* Ex. 5
8 (<https://www.facebook.com/help/569371393126980/>, “Post or edit a video on your
9 Facebook Page”); Ex. 6 (<https://www.facebook.com/help/587160588142067/>, “Go
10 live on Facebook using streaming software”). Defendant provides these instructions,
11 and other materials, knowing and intending (or with willful blindness to the fact) that
12 Facebook users will commit these infringing acts. Defendant also continues to make,
13 use, offer for sale, sell, and/or import the Accused Products and Services, despite its
14 knowledge of the ’633 Patent, thereby specifically intending for and inducing
15 Facebook users to infringe the ’633 Patent through the users’ normal and customary
16 use of the Accused Products and Services.

17 23. Defendant has also knowingly contributed to the infringement, and
18 continues to do so, of one or more claims of the ’633 Patent in violation of 35 U.S.C.
19 § 271(c) by selling, offering for sale, or importing into the United States, the Accused
20 Products and Services, knowing that the Accused Products and Services constitute a
21 material part of the inventions claimed in the ’633 Patent, are especially made or
22 adapted to infringe the ’633 Patent, and are not staple articles or commodities of
23 commerce suitable for non-infringing use. At least as of the filing and service of this
24 Complaint, Defendant has knowledge of the ’633 Patent and the infringing nature of
25 the Accused Products and Services through, for example, the ’633 Patent claim charts
26 served herewith. For example, the accused video streaming features constitute a
27 material part of the inventions claimed in the ’633 Patent, are especially made or
28 adapted to infringe the ’633 Patent, and are not staple articles or commodities of

1 commerce suitable for non-infringing use, as demonstrated by the evidence in Exhibit
2 8. At present, Plaintiff does not allege that Defendant contributed to infringement of
3 the '633 Patent in violation of 35 U.S.C. § 271(c) prior to the filing and service of this
4 Complaint.

5 24. On information and belief, Plaintiff (including its predecessors and any
6 licensees) complied with 35 U.S.C. § 287 with respect to the asserted system claims
7 of the '633 Patent during the relevant time period because Plaintiff, any predecessor
8 assignees to the '633 Patent, and any licensees did not make, offer for sale, or sell
9 products that practice(d) the '633 Patent during the relevant time period or were not
10 required to mark during the relevant time period.

11 25. As a result of Defendant's direct infringement of the '633 Patent,
12 Plaintiff is entitled to monetary damages (past, present, and future) in an amount
13 adequate to compensate for Defendant's infringement, but in no event less than a
14 reasonable royalty for the use made of the invention by Defendant, together with
15 interest and costs as fixed by the Court.

16 26. As a result of Defendant's indirect infringement of the '633 Patent,
17 Plaintiff is entitled to monetary damages (present and future) in an amount adequate
18 to compensate for Defendant's infringement, but in no event less than a reasonable
19 royalty for the use made of the invention by Defendant, together with interest and
20 costs as fixed by the Court, accruing as of the time Defendant obtained knowledge of
21 the '633 Patent.

22 **COUNT III**

23 **INFRINGEMENT OF U.S. PATENT NO. 10,484,442**

24 27. Plaintiff realleges and incorporates by reference the foregoing
25 paragraphs as if fully set forth herein.

26 28. Plaintiff owns by assignment all rights, title, and interest, including the
27 right to recover damages for past, present, and future infringement, in U.S. Patent No.
28 10,484,442, titled "Just-in-time distributed video cache." The '442 Patent was duly

1 and legally issued by the United States Patent and Trademark Office on November
2 19, 2019. The '442 Patent is valid and enforceable. A true and correct copy of
3 the '442 Patent is attached hereto as Exhibit 9.

4 29. Upon information and belief, Defendant has directly infringed and
5 continues to directly infringe under 35 U.S.C. §§ 271 (a), literally and/or under the
6 doctrine of equivalents, one or more claims of U.S. Patent No. 10,484,442, including
7 at least claim 1, by performing each step of the claimed method and/or by directing
8 or controlling the performance of such steps by third parties. Defendant offers,
9 provides, maintains, operates, and administers selective traffic monitoring services,
10 including without limitation through Facebook, in a service provider network that
11 performs the steps of the claimed method either directly through its own actions,
12 through the operation of equipment under its control, or through customers acting
13 under conditions established and orchestrated by Defendant (the "Accused Products
14 and Services"). By making, using, offering for sale, selling and/or importing into the
15 United States the Accused Products and Services, Defendant has injured Plaintiff and
16 is liable for infringement of the '442 Patent pursuant to 35 U.S.C. § 271(a).

17 30. The Accused Products and Services satisfy all claim limitations of one
18 or more claims of the '442 Patent. A claim chart comparing exemplary independent
19 claim 1 of the '442 Patent to representative Accused Products and Services is attached
20 as Exhibit 10.

21 31. Defendant knowingly and intentionally induced infringement, and
22 continues to do so, of one or more claims of the '442 Patent in violation of 35 U.S.C.
23 § 271(b) by encouraging, instructing, or otherwise facilitating customers and end
24 users to use the Accused Products and Services, in a manner that directly infringes
25 the claimed method, literally and/or under the doctrine of equivalents, with knowledge
26 of the '442 Patent and intent that such infringement occur. At least as of the filing and
27 service of this Complaint, Defendant has knowledge of the '442 Patent and the
28 infringing nature of the Accused Products and Services through, for example, the '442

1 Patent claim charts served herewith. At present, Plaintiff does not allege that
2 Defendant induced infringement of the '442 Patent in violation of 35 U.S.C. § 271(b)
3 prior to the filing and service of this Complaint.

4 32. Despite this knowledge of the '442 Patent, Defendant continues actively
5 encouraging and instructing its customers and end users (for example, through online
6 instruction materials on its website and materials cited in Exhibit 10) to use the
7 Accused Products and Services in ways that directly infringe the '442 Patent. For
8 example, Defendant advertises the use of Facebook as a video streaming platform.
9 *See* Ex. 3 ([https://www.facebook.com/help/](https://www.facebook.com/help/1468879913412530/?helpref=related_articles)
10 [1468879913412530/?helpref=related_articles](https://www.facebook.com/help/1468879913412530/?helpref=related_articles), "Watch live videos on Facebook");
11 Ex. 4 (https://www.facebook.com/help/401287967326510?helpref=popular_articles,
12 "Watching Shows and Videos"). Further, Defendant provides Facebook users with
13 instructions and user guides detailing how to setup, configure, and use the Accused
14 Products and Services to utilize the infringing functionality. *See* Ex. 5
15 (<https://www.facebook.com/help/569371393126980/>, "Post or edit a video on your
16 Facebook Page"); Ex. 6 (<https://www.facebook.com/help/587160588142067/>, "Go
17 live on Facebook using streaming software"). Defendant provides these instructions,
18 and other materials, knowing and intending (or with willful blindness to the fact) that
19 Facebook users will commit these infringing acts. Defendant also continues to make,
20 use, offer for sale, sell, and/or import the Accused Products and Services, despite its
21 knowledge of the '442 Patent, thereby specifically intending for and inducing
22 Facebook users to infringe the '442 Patent through the users' normal and customary
23 use of the Accused Products and Services.

24 33. Defendant has also knowingly contributed to the infringement, and
25 continues to do so, of one or more claims of the '442 Patent in violation of 35 U.S.C.
26 § 271(c) by selling, offering for sale, or importing into the United States, the Accused
27 Products and Services, knowing that the Accused Products and Services constitute a
28 material part of the inventions claimed in the '442 Patent, are especially made or

1 adapted to infringe the '442 Patent, and are not staple articles or commodities of
2 commerce suitable for non-infringing use. At least as of the filing and service of this
3 Complaint, Defendant has knowledge of the '442 Patent and the infringing nature of
4 the Accused Products and Services through, for example, the '442 Patent claim charts
5 served herewith. For example, the accused video streaming features constitute a
6 material part of the inventions claimed in the '442 Patent, are especially made or
7 adapted to infringe the '442 Patent, and are not staple articles or commodities of
8 commerce suitable for non-infringing use, as demonstrated by the evidence in Exhibit
9 10. At present, Plaintiff does not allege that Defendant contributed to infringement
10 of the '442 Patent in violation of 35 U.S.C. § 271(c) prior to the filing and service of
11 this Complaint.

12 34. On information and belief, Plaintiff (including its predecessors and any
13 licensees) complied with 35 U.S.C. § 287 with respect to the asserted system claims
14 of the '442 Patent during the relevant time period because Plaintiff, any predecessor
15 assignees to the '442 Patent, and any licensees did not make, offer for sale, or sell
16 products that practice(d) the '442 Patent during the relevant time period or were not
17 required to mark during the relevant time period,

18 35. As a result of Defendant's direct infringement of the '442 Patent,
19 Plaintiff is entitled to monetary damages (past, present, and future) in an amount
20 adequate to compensate for Defendant's infringement, but in no event less than a
21 reasonable royalty for the use made of the invention by Defendant, together with
22 interest and costs as fixed by the Court.

23 36. As a result of Defendant's indirect infringement of the '442 Patent,
24 Plaintiff is entitled to monetary damages (present and future) in an amount adequate
25 to compensate for Defendant's infringement, but in no event less than a reasonable
26 royalty for the use made of the invention by Defendant, together with interest and
27 costs as fixed by the Court, accruing as of the time Defendant obtained knowledge of
28 the '442 Patent.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

- a. A judgment in favor of Plaintiff that Meta has infringed, either literally and/or under the doctrine of equivalents, the '347, '633, and '442 Patents under 35 U.S.C. §§ 271(a), (b) and (c);
- b. A judgment and order requiring Meta to pay Plaintiff its damages, costs, expenses, and pre-judgment and post-judgment interest for Meta's infringement of the '347, '633, and '442 Patents;
- c. A judgment and order requiring Meta to provide an accounting and to pay supplemental damages to Plaintiff, including without limitation, pre-judgment and post-judgment interest;
- d. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Meta; and
- e. Any and all other relief as the Court may deem appropriate and just under the circumstances.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

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DATED: October 16, 2025

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