IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOXER, INC. and VOXER IP LLC,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 25-872 (GBW)
	)	
AMAZON.COM, INC., AMAZON WEB SERVICES, INC., and TWITCH INTERACTIVE, INC.	)	
	)	
Defendants.	)	

DEFENDANTS' OPENING BRIEF IN SUPPORT OF THEIR MOTION TO SEVER AND STAY VOXER'S CLAIMS AGAINST AMAZON.COM, INC., AND TO TRANSFER VOXER'S CLAIMS AGAINST TWITCH INTERACTIVE AND AMAZON WEB SERVICES TO THE NORTHERN DISTRICT OF CALIFORNIA

MORRIS, NICHOLS, ARSHT & TUNNELL LLP
Jennifer Ying (#5550)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jying@morrisnichols.com

Attorneys for Defendants Amazon.com, Inc., Amazon Web Services, Inc., and Twitch Interactive, Inc.

OF COUNSEL:

Brian C. Nash
MORRISON & FOERSTER LLP
300 Colorado Street, Suite 1800
Austin, TX 78701
(512) 617-0650

Kyle W.K. Mooney
MORRISON & FOERSTER LLP
280 West 55th Street
New York, NY 10019
(212) 468-8000

Lily Yue Li
MORRISON & FOERSTER LLP
755 Page Mill Road
Palo Alto, CA 94304
(650) 813-5600

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TABLE OF ABBREVIATIONS

Abbreviation	Description
"Chang Ex. __"	Exhibits attached to the Declaration of Evelyn L. Chang in Support of Defendants' Motion to Sever and Stay Voxer's Claims Against Amazon.com, Inc., and to Transfer Voxer's Claims Against Twitch Interactive and Amazon Web Services to the Northern District of California, dated January 7, 2025
"Francis ¶ __"	Declaration of Andrew Francis in Support of Defendants' Motion to Sever and Stay Voxer's Claims Against Amazon.com, Inc., and to Transfer Voxer's Claims Against Twitch Interactive and Amazon Web Services to the Northern District of California, dated January 3, 2026
"Woodsey ¶ __"	Declaration of Jacob Woodsey in Support of Defendants' Motion to Sever and Stay Voxer's Claims Against Amazon.com, Inc., and to Transfer Voxer's Claims Against Twitch Interactive and Amazon Web Services to the Northern District of California, dated January 7, 2026
"Manriquez ¶ __"	Declaration of Nick Manriquez in Support of Defendants' Motion to Sever and Stay Voxer's Claims Against Amazon.com, Inc., and to Transfer Voxer's Claims Against Twitch Interactive and Amazon Web Services to the Northern District of California, dated January 7, 2026
"Klein ¶ __"	Declaration of Keith Klein in Support of Defendants' Motion to Sever and Stay Voxer's Claims Against Amazon.com, Inc., and to Transfer Voxer's Claims Against Twitch Interactive and Amazon Web Services to the Northern District of California, dated January 7, 2025

Pursuant to 28 U.S.C. § 1404(a) and Federal Rule of Civil Procedure 21, defendants Twitch Interactive, Inc. ("Twitch"), Amazon Web Services, Inc. ("AWS"), and Amazon.com, Inc. ("ACI") move to sever and stay Voxer's claims against ACI and to transfer Voxer's claims against Twitch and AWS to the Northern District of California.

I. SUMMARY OF ARGUMENT

Voxer's claims that Twitch.tv infringes its patents should be tried in the Northern District of California because this is a dispute about technology developed in Northern California by Northern Californian engineers working at Northern Californian companies. Voxer's naming of AWS and ACI as additional defendants does not change that analysis. AWS, which owns servers on which Twitch.tv runs, has offices and data centers throughout Northern California and could have been sued in that district. And ACI, a mere holding company lacking any employees, is not involved in the day-to-day operations of either of these companies and should not have been named as a defendant in the first place.

Twitch was founded and remains headquartered in San Francisco. Both the accused product, Twitch.tv, and its prior art predecessor, Justin.tv, were developed by Twitch engineers in San Francisco. Critical third-party witnesses, including Twitch's original founders and Justin.tv developers, also reside in the Northern District of California and would be subject to the subpoena power of that Court. Twitch and AWS's other expected witnesses also reside mainly in the Northern District of California.

Plaintiffs Voxer, Inc. and Voxer IP LLC (collectively, "Voxer") were also founded and originally headquartered in San Francisco. The asserted patents are based on technology developed by Voxer's engineers in San Francisco. Voxer, Inc.'s subsidiary VoxerNet LLC has at least twice sought to transfer suits relating to the same technology to the Northern District of California, asserting that "the public and private factors overwhelmingly favor transferring [the]

case to Voxer's home venue, the Northern District of California." (Chang Ex. 1 at 1.) The fact that Voxer is now a plaintiff does not change the analysis. As Voxer argued in successfully transferring one of those cases to the Northern District of California, a plaintiff "cannot manufacture proper venue in a forum with no connections to [defendants], the Plaintiff, or this dispute merely by filing complaints." (Chang Ex. 2 at 1.)

That is the case here. The only connection that this case has to Delaware is the parties' incorporation here. None of the parties has offices in Delaware. None of the technology at issue was developed here. None of the named inventors of the asserted patents reside here. And none of Voxer's, Twitch's, or AWS's expected witnesses reside here. The parties also have not identified any third-party witnesses who live in Delaware or who would be subject to the subpoena power of this Court. Nor are there any records accessible only in Delaware.

The analysis here is similar to that in *MetaRail, Inc. v. Google LLC*, a case that this Court recently transferred to the Northern District of California. No. 23-CV-1116-GBW, D.I. 42, 46 (D. Del. Sept. 24, 2025). In transferring that case, also filed by a Delaware-incorporated plaintiff, the Court emphasized that Google was headquartered in the Northern District of California, "the majority of the operative events . . . have occurred or do occur" in that district, the majority of Google witnesses reside in that district, and two named inventors and several inventors of prior art systems reside there. Those factors also support transfer here.

Finally, Voxer's claims against ACI should be severed and stayed. This is analogous to *Teleconference Systems v. Proctor & Gamble Pharms., Inc.*, in which another court in this district severed and stayed infringement claims against one defendant (Enbridge) before transferring the case to the Northern District of California. 676 F. Supp. 2d 321 (D. Del. 2009). The court determined that the other defendants had "significant contacts with California and minimal

contacts with Delaware" and that Enbridge was "not an essential party," "play[ed] no meaningful role" in resolving infringement and validity issues, and that none of the parties had identified "any key Enbridge witnesses, documents or evidence." *Id.* at 330, 332. Like Enbridge, ACI is "not an essential party," will play "no meaningful role" in resolving infringement and validity, and has no witnesses, documents, or evidence.

II. NATURE AND STAGE OF THE PROCEEDINGS

Voxer sued defendants for patent infringement on July 14, 2025, contending that the Twitch.tv video-streaming platform infringes five patents. (D.I. 1.) Defendants moved to dismiss Voxer's Complaint for failure to state a claim. (D.I. 14.) Voxer separately sued Google LLC and YouTube LLC for allegedly infringing the same patents: *Voxer, Inc. et al. v. Google LLC et al.*, No. 25-CV-873-GBW (D. Del.). A scheduling order was entered on January 6, 2026. (D.I. 28.)

III. BACKGROUND

A. Voxer

Voxer, Inc. was founded in San Francisco in 2007. (D.I. 1 ¶ 2; Chang Ex. 1 at 1.) Voxer's flagship product was a "walkie-talkie" application ("Voxer App") that allows users to speak with other users "live," listen to previously recorded messages, and participate in multiple conversations simultaneously. (D.I. 1 ¶¶ 3, 34.) Voxer designed and developed the Voxer App in San Francisco. (Chang Ex. 1 at 2; Chang Ex. 2 at 2.) Voxer filed the provisional applications leading to the asserted patents in June 2007 and contends that the later-released Voxer App practices the claimed inventions. (D.I. 1, Exs. A-E; *Id.* ¶ 35.) As of the filing date of those applications, Voxer was still headquartered in San Francisco. (Chang Ex. 3.)

Voxer now alleges that its principal place of business is 539 West Commerce St. #7050, Dallas, Texas, 75208 (D.I. 1 ¶ 8), but this location appears to be a "virtual business address" purchased on a monthly subscription from "PhysicalAddress.com." (Chang Ex. 4.) In practice,

Voxer continues to use various San Francisco addresses. (*See, e.g.*, Chang Ex. 5 at 1 (Voxer's LinkedIn Profile showing its "primary" location as 760 Market Street, Suite 500, San Francisco); Chang Ex. 6 at 8-9 (September 2024 patent application identifying the mailing address for Voxer IP LLC as 760 Mission Street, Suite 500, San Francisco).) Voxer's current Terms of Service even require its customers to litigate all non-arbitrable disputes in the "state and federal courts located in the [*sic*] San Francisco, California." (Chang Ex. 7 at 9.) And at least five of Voxer's ten domestic employees still appear to live in the San Francisco area. (Chang Ex. 8 at 2, 4.) In contrast, none of Voxer's employees reside in Delaware. (Chang Ex. 8.)

B. Twitch

Twitch was founded in San Francisco in 2006 by co-founders Justin Kan, Emmett Shear, Michael Seibel, and Kyle Vogt. (Woodsey ¶ 3.) Twitch was originally named Justin.tv, Inc. (*Id.*) Twitch has been headquartered in San Francisco since its founding. (Manriquez ¶ 3.) Twitch's original headquarters was located at 225 Bush Street, San Francisco, California. (*Id.*) Twitch moved into its current headquarters at 350 Bush Street, San Francisco, California in 2018. (*Id.*) Twitch does not have, and has never had, any offices in Delaware. (*Id.*)

Twitch's flagship product is a live-streaming video platform known as Twitch.tv. (Woodsey ¶ 4.) Twitch.tv traces its development to Justin.tv which was publicly available by March 2007. (*Id.*) Justin.tv was developed by Twitch's co-founders and allowed people to broadcast video, including video gaming content. (*Id.*) Twitch.tv continues to include the same core product and many of the same features as predecessor Justin.tv. (*Id.*) The co-founders of Twitch and Twitch.tv (then Justin.tv) are no longer affiliated with Twitch but continue to reside in San Francisco. (*Id.* ¶ 5; Chang Exs. 9-12.) The Twitch engineers most knowledgeable about Twitch.tv's structure and operation are also based in Northern California. (Manriquez ¶ 5.)

C. Amazon Web Services

AWS is a subsidiary of ACI and provides cloud computing capabilities, such as networking, computing, and storage, to its clients. (Klein ¶ 4.) AWS has offices and data centers throughout Northern California to service its West Coast customers, including Twitch. (*Id.*) AWS has 16 offices located in Northern California, including three offices in San Francisco, and additional offices in Cupertino, Santa Clara, Sunnyvale, East Palo Alto, Mountain View, and Santa Cruz. (*Id.* ¶ 3.) AWS has data centers located at Santa Clara, Hayward, and San Francisco. (*Id.* ¶ 4.) Servers in those data centers host Twitch.tv. (*Id.*; Francis ¶ 4.) AWS does not have any offices or data centers in Delaware. (Klein ¶¶ 3-4.)

D. Amazon.com Inc.

ACI is a non-operating holding company headquartered in Seattle, Washington, and is the parent to operating companies including Twitch and AWS. (*Id.* ¶ 8.) ACI does not have any employees and is not involved in the day-to-day operations of Twitch and AWS. (*Id.* ¶¶ 8-9.)

IV. LEGAL STANDARD

A federal court may transfer a case to "any other district or division where it might have brought." 28 U.S.C. § 1404(a). This statutory requirement is met "if venue would have been proper [in the transferee district] and if that district court could have exercised personal and subject matter jurisdiction over this action." *Blackbird Tech LLC v. Cloudflare, Inc.*, No. 17-283, 2017 WL 4543783, at *3 (D. Del. Oct. 11, 2017).

In deciding whether to transfer to a district court meeting that requirement, the court is to consider the following factors set forth in *Jumara v. State Farm Ins. Co.*, 55 F.3d 873, 879-80 (3d Cir. 1995): (1) plaintiff's forum preference; (2) the defendant's forum preference; (3) whether the claim arose elsewhere; (4) the convenience of the parties as indicated by their relative physical and financial condition; (5) the convenience of the witnesses to the extent that the witnesses may be

unavailable for trial in one of the fora; (6) the location of books and records; (7) the enforceability of the judgment; (8) practical considerations that could make the trial easy, expeditious, or inexpensive; (9) the relative administrative difficulty in the two fora resulting from court congestion; (10) the local interest in deciding local controversies at home; (11) the public policies of the fora; and (12) the familiarity of the trial judge with the applicable state law in diversity cases. *Id.* The first six factors are collectively known as the "private interest factors," while the latter six factors are known as the "public interest factors." *Id.*

A "court may sever any claim against a party to facilitate transfer," and "[t]he inclusion of a defendant only peripherally involved in, or indirectly connected to, the alleged wrongdoing should not preclude severance and partial transfer to a more convenient forum." *In re Amazon.com, Inc.*, No. 2022-157, 2022 WL 17688072, at *2 (Fed. Cir. Dec. 15, 2022). The court has "virtually unfettered discretion in determining whether or not severance is appropriate." *Rothschild Mobile Imaging Innovations, LLC v. Mitek Sys., Inc.,* No. 14-617-GMS, 2015 WL 4624164, at *2 (D. Del. July 31, 2015). In making that determination, the court may consider whether "(1) the claim to be preserved [*sic*] is peripheral to the remaining claims; (2) the adjudication of the remaining claims is potentially dispositive of the severed claim; and (3) the transfer of the remaining claims is warranted under 28 U.S.C. § 1404(a)." *Id.*

V. ARGUMENT

Voxer's claims against Twitch and AWS should be transferred to the Northern District of California. Voxer's claims against ACI should be severed and stayed.

A. Voxer's Claims Against Twitch and AWS Should be Transferred to the Northern District of California

The Northern District of California is a far more appropriate forum to adjudicate Voxer's claims against Twitch and AWS. Twitch, AWS, and Voxer have stronger ties to Northern California

than to Delaware, and the alleged inventions, Twitch.tv, and Voxer App, were all developed there. In contrast, the parties have no offices in Delaware and no party or third-party witnesses appear to reside in that district. Transfer is appropriate and warranted.

1. Voxer could have filed suit against Twitch and AWS in the Northern District of California

Voxer's claims against Twitch and AWS could have been filed in the Northern District of California. Twitch is headquartered in San Francisco and, accordingly, has a regular and established place of business in the Northern District of California. (Manriquez ¶ 3.) Twitch also operates the allegedly infringing Twitch.tv from that district. (Francis ¶ 4; Klein ¶ 4.) Venue is proper. *See* 28 U.S.C. § 1400(b); *In re Cray*, 871 F.3d 1355, 1360 (Fed. Cir. 2017). Because Twitch is headquartered in San Francisco, the Court can also exercise general jurisdiction over it. *See Daimler AG v. Bauman*, 134 S. Ct. 746, 760-62, nn.19-20 (2014).[1]

Likewise, Voxer's claims against AWS could have been brought in the Northern District of California. AWS maintains regular and established places of business, including offices and data centers, throughout Northern California. (Klein ¶¶ 3-4.) And Voxer's infringement allegations point to the Twitch.tv platform that is operated from San Francisco and runs on AWS servers, including servers in the Northern District of California. (D.I. 1 ¶¶ 1, 13, 15, 16; Francis ¶ 4; Klein ¶ 4.) Accordingly, venue is proper, and the court can exercise jurisdiction over AWS. *See* 28 U.S.C. § 1400(b); *In re Cray*, 871 F.3d at 1360; *Polar Electro*, 829 F.3d at 1348.

2. The Private Interest Factors Favor Transfer

The private interest factors strongly favor transfer to the Northern District of California.

[1] The Court may also exercise specific jurisdiction over Twitch because alleged infringing acts took place in Northern California and the exercise of jurisdiction would otherwise be reasonable and fair. *See Polar Electro Oy v. Suunto Oy*, 829 F.3d 1343, 1348 (Fed. Cir. 2016); *see also j2 Global Commc'ns, Inc, v. Vitelity Commc'ns, LLC*, 2012 WL 1229851, at *2-3 (C.D. Cal. Apr. 12, 2012) (California long-arm statute coextensive with due process clause).

While the parties are incorporated in Delaware, this action has no other apparent ties to Delaware. Most relevant witnesses, including critical third-party witnesses and named inventors, reside in the Northern District of California. The accused Twitch.tv platform and the technology claimed in the asserted patents were likewise developed in the Northern District of California, which Voxer itself has called its "home venue."

a. Several Critical Witnesses Are Within the Subpoena Power of the District Court for the Northern District of California

The Northern District of California can compel the appearance of critical non-party witnesses, including named inventors, Twitch.tv founders, third-party prior artists, and ex-Voxer employees. These witnesses reside in the Northern District of California and are therefore beyond the subpoena power of this Court. This strongly favors transfer.

(i) Justin.tv

Twitch and AWS intend to call at trial one or more founders of Twitch, who were the developers of prior art Justin.tv. Justin.tv was formed before Voxer. (*Compare* Woodsey ¶ 3*, with* D.I. 1 ¶ 2.) Justin.tv was launched before the priority date of the asserted patents, and long before the first prototype of the Voxer App. (*Compare* Woodsey ¶ 3, with D.I. 1 ¶¶ 2-3.) Justin.tv also included the same core product and many of the same features as the accused Twitch.tv platform. (Woodsey ¶ 4.) Defendants' ability to present the story of Twitch's founding, the development of Justin.tv (and Twitch.tv), and the invalidating Justin.tv prior art depends on their ability to call one or more of Twitch's original founders.

Each of these witnesses was at the company during the critical period before, and after, the alleged development of the Voxer App and the filing of the applications leading to the asserted patents: Justin Kan was employed by Twitch from 2006 through 2014; Emmett Shear was employed by Twitch from 2006 through 2023, and was Chief Executive Officer from 2011 through

his departure in 2023; Michal Seibel was employed by Twitch from 2006 through 2011 and was Chief Executive Officer from 2007 through his departure; and Kyle Vogt was employed by Twitch from 2006 through 2013. (Woodsey ¶ 5.) These witnesses have unique personal knowledge regarding the development and operation of Twitch.tv (and predecessor Justin.tv) from the founding of Twitch in 2006 (if not before) through the launch of Justin.tv. (*Id.* ¶ 6.)

Because these witnesses are no longer employed by Twitch, Twitch and AWS may have to subpoena these witnesses, all of whom currently reside in San Francisco. (Chang Exs. 9-12.) Transfer to the Northern District of California is therefore the only fail-safe option to secure the critical trial testimony of these witnesses. *See, e.g.*, *Metarail*, No. 23-CV-1116-GBW, D.I. 46 at 5-6 (favoring transfer where "seven inventors of prior art systems [are] located in the Northern District of California" and the lack of a current relationship with the defendant was "sufficient to provide some reason to believe that they would refuse to testify").

(ii) Other Third-Party Prior Artists

Twitch and AWS may also offer as prior art, BlogTV and Macromedia—video streaming platforms that were commercially available prior to the earliest priority date of the asserted patents. Twitch and AWS may rely at trial on the founders and engineers responsible for developing BlogTV and Macromedia to explain the development history, structure and operation, and availability of these prior art systems. These persons include Oren Levy (CEO and Vice President of Engineering of BlogTV) and Marc Canter (CEO and Founder of Macromedia). Mr. Levy resides in Palo Alto, California, and Mr. Canter resides in Walnut Creek, California. (Chang Ex. 13; Chang Ex. 14.) Both prior artists are therefore beyond the subpoena powers of this Court but squarely within that of the Northern District of California. Twitch and AWS's ability to compel the testimony of these prior artists supports transfer. *See Metarail,* No. 23-CV-1116-GBW, D.I. 46 at 5-6; *see also Blackbird Tech*, 2017 WL 4543783, at *9 (granting transfer and explaining that

"[a]s prior art will likely be an issue at trial and as the prior art inventors may have relevant and material information, the location of potential prior art witnesses must be a consideration in the venue transfer analysis").

(iii) Ex-Voxer Employees

Defendants also expect to require trial testimony from ex-Voxer employees, including named inventors of the asserted patents who live in the Northern District of California and who are subject to the subpoena power of that court. These witnesses will have unique personal knowledge concerning (1) conception and reduction to practice of the alleged inventions, (2) inventorship, including potential non-joinder and misjoinder, (3) alleged secondary considerations of non-obviousness, (4) development, design, and sale of the Voxer App, and (5) Voxer's awareness of Twitch.tv predecessor Justin.tv at the time of the alleged invention.

For example, ex-Voxer employees Mary and James Panttaja are founding members of Voxer and named inventors on all asserted patents. Ms. Panttaja was the former Vice President Product Management and Patent Portfolio Development Manager at Voxer. (Chang Ex. 1 at 3; Chang Ex. 19.) Mr. Panttaja was Voxer's former Vice President of Research and Development. (Chang Ex. 1 at 3; Chang Ex. 21.) Both reside in Healdsburg, California. (Chang Ex. 20 at 2; Chang Ex. 22 at 2.) Voxer, in seeking to transfer another case related to its Voxer App to the Northern District of California, emphasized that both are "key technical witnesses" who have "relevant knowledge of the initial prototype and design stages of the […Voxer App] and Voxer's business development activities" and "unique and relevant knowledge" about "the development, features, and functions of the [Voxer App]."[2] (Chang Ex. 1 at 3, 8.)

[2] To support VoxerNet's own transfer motion in prior litigation, Mr. Panttaja had explained that the Northern District of California was "extremely more convenient" than even the Eastern District of Texas. (Chang Ex. 23 at ¶ 9.)

In addition, ex-employees Andrew Kelly (Voxer's former General Manager and Chief Financial Officer), Nicole Strada (Voxer's former Head of Marketing), and Julian Gautier (Voxer's former Lead Server Engineer) appear to reside in the Northern District of California and to have unique and relevant information. (Chang Ex. 1 at 3, 8; *see also* Chang Ex. 24; Chang Ex. 25; Chang Ex. 26.) In prior litigation, Voxer has emphasized the importance of their testimony concerning Voxer's technology. For example, Voxer stressed Mr. Kelly's knowledge of the company from "the early stage creation of the [Voxer App]" and Ms. Strada's knowledge of "Voxer's marketing activities related to its products." (Chang Ex. 1 at 3.) According to Voxer, both could testify regarding "Voxer's past product management, financial information, sales, and marketing activities." (Chang Ex. 1 at 8.) And Voxer has emphasized that Mr. Gautier has relevant "technical information" concerning the Voxer App. (Chang Ex. 1 at 8.)

In sum, Twitch and AWS may require the testimony of critical Voxer former employees[3] and, as Voxer itself conceded when seeking transfer, "[c]ourts in this District cannot compel Voxer's former employees . . . to attend trial." (Chang Ex. 1 at 10 (citing *In re Genentech*, 566 F.3d 1338, 1345 (Fed. Cir. 2009)).) Here, as in that case, "[t]his factor weighs the heaviest in favor of a transfer when [the Northern District of California] has "absolute subpoena power." (Chang Ex. 1 at 10.) *See also Genentech*, 566 F.3d at 1345 ("The fact that the transferee venue is a venue with usable subpoena power here weighs in favor of transfer, and not only slightly.").

(iv) Prosecution Counsel

The asserted patents were prosecuted by attorneys of the Beyer Law Group, a firm "headquartered in Palo Alto, California." (Chang Ex. 27; D.I. 1, Exs. A-E.) Partner Steve Beyer,

[3] In prior litigation, Voxer itself recognized the value of inventor testimony to "issues such as conception and reduction to practice, claim scope, and invalidity," and argued for transfer to the Northern District of California where third-party inventors of the asserted patents would be subject to the subpoena power of the court. (Chang Ex. 2 at 8, 11.)

who prosecuted many of the asserted patents, is based in Cupertino, California. (Chang Ex. 28.) Given Mr. Beyer's unique first-hand knowledge of the prosecution of the patents, including Voxer's failure to disclose Justin.tv and other prior art, Twitch and AWS may require his attendance at trial. His residence within the Northern District of California favors transfer. *See, e.g.*, *Aylo Freesites Ltd v. Dish Techs. L.L.C.*, No. 24-086-GBW, 2025 WL 2851827, at *8 (D. Del. Oct. 8, 2025) (granting transfer to Utah because "several witnesses reside in Utah, outside the subpoena power of the Court, including the prosecuting attorney…").

b. The Northern District of California is More Convenient for the Parties and Their Witnesses

The Northern District of California is more convenient for the parties and party witnesses, which strongly favors transfer. Courts in this district have found that this factor favors transfer even if all parties are incorporated in Delaware when "it would be at least marginally more convenient for [the defendant] to produce its witnesses and documents" in the transferee district and both districts "appear equally convenient" for the plaintiff. *See, e.g., Ultravision Techs., LLC v. RMG Networks Holding Corp.*, No. 18-1333-CFC, 2019 WL 1985110, at *2 (D. Del. May 6, 2019); *see also Metarail*, No. 23-CV-1116-GBW, D.I. 46 at 4-5.

The Northern District of California is far more than "marginally" convenient for Twitch and AWS's witnesses. Twitch is based in San Francisco and most engineers who will testify at trial are based in San Francisco. (Manriquez ¶¶ 3, 5.) Twitch's primary custodian of financial information related to Twitch.tv is also based in San Francisco. (*Id.* ¶ 6.) Similarly, many knowledgeable AWS engineers are based in Northern California. (Klein ¶ 6.) None of Twitch's or AWS's relevant party witnesses reside in Delaware. Most, if not all, of Twitch and AWS's party witnesses would therefore have to travel across the country if called upon to testify at trial. Courts have favored transfer to avoid imposing such unnecessary travel for party witnesses. *See, e.g.*,

Samsara Inc. v. Motive Techs., Inc., No. 24-84 (MN), 2024 WL 3822981, at *5 (D. Del. Aug. 14, 2024) (favoring transfer to Northern District of California because San Francisco employees would otherwise have to make a "3,000 mile" journey to Delaware).

The Northern District of California is also likely more convenient for Voxer's witnesses. Voxer itself has sought transfer from the Eastern District of Texas to the Northern District of California on the ground that "[a]l of Voxer's employees are located in San Francisco" and "would be required to incur significant travel costs, take critical time off from work, and leave their family obligations behind for up to three weeks to prepare for and attend trial." (Chang Ex. 1 at 7.) While Voxer's current operational status is unknown, it appears five of Voxer's ten remaining domestic employees still live in the San Francisco area—including two of the six employees listed on its website—and would be forced to incur an even more significant burden flying twice as far from their home and work for this case. (Chang Ex. 8; Chang Ex. 29.) And Voxer's president and named inventor, Tom Katis, resides in Jackson, Wyoming, which is much closer to Northern California than Delaware. (Chang Ex. 15; *compare* Chang Ex. 17 *to* Chang Ex. 18.) None of Voxer's employees appear to live in Delaware. (Chang Ex. 8.)

Given the location of witnesses, litigating in the Northern District of California is far more cost-effective for the parties. *See, e.g.*, *Symantec Corp. v. Zscaler, Inc.*, No. 17-806, 2017 WL 3262246, at *3 (D. Del. July 31, 2017) (favoring transfer because the "costs for employees to travel to Delaware would be complicated and more expensive than from their principal places of business within the Northern District of California to the San Jose courthouse").

c. The Claims Arose in the Northern District of California

The fact that these claims arose in the Northern District of California also strongly favors transfer to that district. As this Court explained in *Metarail*, the location where the technology was researched, designed, and developed is relevant to the transfer analysis. *Metarail*, No. 23-

1116-GBW, D.I. 46 at 4; *see also Linex Techs., Inc. v. Hewlett-Packard Co.,* No. 11-400-GMS, 2013 WL 105323, at *4 (D. Del. Jan. 7, 2013). Here, Twitch.tv and its predecessor, Justin.tv, were researched, designed, and developed in San Francisco. (Woodsey ¶¶ 3-4.) Plaintiffs' Voxer App was also developed in San Francisco. (Chang Ex. 1 at 2; Chang Ex. 2 at 2.) No research, development, or design work for Twitch.tv or the Voxer App was done in Delaware.

The research, design, and development of the accused Twitch.tv and Voxer's own alleged practicing technology in San Francisco favors transferring this action to the Northern District of California. *See, e.g., Metarail*, No. 23-CV-1116-GBW, D.I. 46 at 4 (finding "deeper roots" in the transferee forum where the "employees involved in designing, developing, and marketing [the accused] products are located"); *Blackbird Tech*, 2017 WL 4543783, at *6 ("[T]his factor advocates in favor of transfer" to California because "most, if not all, of the development of the infringing method occurred in California, and none of it took place in Delaware.").

d. Twitch and AWS's Preference Favors Transfer

Twitch and AWS's motion to transfer identifies the Northern District of California as their preferred venue, and this factor therefore favors transfer. *Smart Audio Techs., LLC v. Apple, Inc.*, 910 F. Supp. 2d 718, 730 (D. Del. 2012) ("By filing its motion to transfer, [defendant] has indicated that it would rather litigate in California…. This factor weighs in favor of transfer.").

e. The Location of Books and Records Factor is Neutral

As Voxer has conceded, in patent infringement cases "the most relevant evidence under this factor" is the accused infringer's evidence. (Chang Ex. 1 at 9.) Here, Twitch's and AWS's documents and source code are stored in cloud-based systems, accessible in both California and Delaware. (Francis ¶ 3; Klein ¶ 7.) Voxer, however, has previously represented that its records are in San Francisco, (Chang Ex. 2 at 7-8; Chang Ex. 1 at 2), and there is no evidence that they have been moved. This factor slightly favors transfer, or at the very least, is neutral.

f. Voxer's Choice of Forum Should Not Weigh Against Transfer

That Voxer identifies Texas as its current principal place of business (D.I. 1, ¶ 8) "diminishes [its] argument that it is at home in Delaware." *Metarail*, No. 23-CV-1116-GBW, D.I. 46 at 3 (citing *Ithaca Ventures k.s. v. Nintendo of Am. Inc.*, No. 13-824-GMS, 2014 WL 4829027, at *2 (D. Del. Sept. 25, 2014)). Before Voxer established a virtual office in Texas and filed suit against Meta, it had repeatedly characterized Northern California as its "home," explaining that its products were developed in San Francisco and that its employees, documents, and source code reside in San Francisco. (*See, e.g.*, Chang Ex. 2 at 1-2; *see also* Chang Ex. 1 at 2.) In fact, Voxer still uses San Francisco business addresses and purports to require disputes arising from use of its Voxer App be resolved in Northern California. (Chang Exs. 5, 6, 7.)

Courts in this district have found under similar circumstances that a plaintiff "cannot reap the full benefits of heightened deference as a result of its minimal connection to Delaware." *Symantec*, 2017 WL 3262246, at *2.

3. The Public Interest Factors Favor Transfer

Given the parties' extensive ties to San Francisco, the Northern District of California has an irrefutable interest in overseeing this litigation. With Google now also seeking a transfer of its parallel litigation against Voxer, the public interest factors together favor transfer.

a. Practical Judicial Considerations Favor Transfer

Transferring this case is judicially practical. Google and YouTube are seeking to transfer Voxer's claims against them to the Northern District of California. *See Voxer, Inc. et al v. Google LLC et al*, C.A. No. 25-873, D.I. 30 (D. Del. Dec. 30, 2025). Because Voxer has asserted the same patents against Google as it has here, the co-pending motion to transfer pose an additional practical consideration for the Court, particularly if the Court is inclined to grant Google's

motion.[4] Keeping the two pending litigations in the same forum would eliminate the need for multiple judges to familiarize themselves with the patents and technology, keep the cases on the same schedule, and avoid potentially inconsistent claim construction. The potential to conserve already-limited judicial resources favors transfer. *Cf. Affymetrix, Inc. v. Synteni, Inc.*, 28 F. Supp. 2d 192, 202–03 (D. Del. 1998) (favoring transfer where all co-defendants requested transfer since all related proceedings would be in the same court).

b. The Local Interest of the Northern District of California in Resolving this Dispute Favors Transfer

The Northern District of California has a unique local interest in this dispute. This case is a dispute between Northern California companies and the technology they developed in Northern California. Voxer was founded and headquartered in the Northern District of California. (Chang Ex. 1 at 1.) Voxer employees developed the Voxer App that allegedly practices the inventions claimed in the asserted patents in the Northern District of California. (*Id.*) Voxer employees allegedly invented and filed for patent protection on the technology claimed in the asserted patents while living and working in the Northern District of California. (*Id.*)

Twitch was also founded and remains headquartered in San Francisco. (Manriquez ¶ 3.) The accused Twitch.tv platform was developed in San Francisco and continues to be primarily operated out of Twitch's San Francisco headquarters today. (*Id.*) The Twitch engineers who work on Twitch.tv are all residents of the Northern District of California. (*Id.* ¶¶ 5-6.)

AWS operates data centers in the Northern District of California to service its West Coast customers. (Klein ¶ 4.) And many engineers responsible for AWS's video streaming support

[4] This Court recently granted multiple Google motions to transfer to the Northern District of California, recognizing that "Google is headquartered in the Northern District of California" and that "the majority of relevant witnesses from Google reside in the Northern District of California." *Metarail*, No. 23-CV-1116-GBW, D.I. 46 at 9; *see also Dialect, LLC v. Google, LLC*, No. 23-378-GBW, 2024 WL 1328908, at *4 (D. Del. Mar. 28, 2024).

services are based in AWS's Northern California offices. (*Id.* ¶ 6.)

In stark contrast, Delaware has a far less compelling interest in this dispute. Voxer, Twitch, and AWS have no offices in Delaware. None of the relevant products in this case was developed in Delaware. Although all parties are incorporated in Delaware, that alone is not enough to demonstrate a localized interest, particularly in comparison to the substantial ties of the parties and the relevant products to the Northern District of California. *See OpenTV, Inc. v. Netflix, Inc.*, No. 12-1733 (GMS), 2014 WL 1292790 at *4 (D. Del. Mar. 31, 2014) (finding Delaware's interest to be "less compelling than that of Northern California" because "the only connection this action has with Delaware is the fact that both parties are incorporated here, and that the parties both offer services nationwide").

c. The Other Public Interest Factors are Neutral

Court Congestion. As this Court found in *Metarail*, recent congestion and time-to-trial statistics in Delaware and the Northern District of California are comparable. *Metarail*, No. 23-CV-1116-GBW, D.I. 46 at 7-8. (*See also* Chang Ex. 16.) Accordingly, this factor is neutral and "generally is not a factor worthy of great weight." *Intell. Ventures I LLC v. Altera Corp.*, 842 F. Supp. 2d 744, 760 (D. Del. 2012).

Judgment Enforceability. In a patent infringement case, courts in this district have found this factor to be neutral. *See, e.g.*, *Magsil Corp. v. Seagate Tech.*, No. 08-940, 2009 WL 1259043, at *2 (D. Del. Apr. 30, 2009) (treating enforceability factor as neutral for patent cases).

Public Policy. Courts in this district have found that "[t]his factor is neutral because [plaintiff] brings federal patent claims which are the [*sic*] resolved in the same manner and under the same Federal Rules of Civil Procedure and Evidence in this District and in the Northern District of California." *MEC Res., LLC v. Apple, Inc.*, 269 F. Supp. 3d 218, 228 (D. Del. 2017).

State Law Knowledge. Courts in this district routinely find this factor neutral in patent

cases because state law is not implicated. *See, e.g.*, *Intell. Ventures*, 842 F. Supp. 2d at 760.

B. Voxer's Claims Against ACI Should be Severed and Stayed

Voxer's claims against ACI should be severed and stayed to facilitate the transfer of Voxer's claims against Twitch and AWS to the Northern District of California.

1. Voxer's Claims Against ACI Should be Severed from its Claims Against Twitch and AWS

Voxer's claims against ACI should be severed. Voxer alleges that Twitch.tv infringes, that Twitch operates that platform, and that Twitch.tv runs, at least in part, on AWS servers. (D.I. 1 ¶¶ 1, 13, 15, 16.) ACI, on the other hand, is a mere holding company that is not involved in the operation of Twitch.tv or any AWS data centers. (Klein ¶ 9.) Voxer's claims against ACI, if not dismissed, are at best peripheral to its claims against Twitch and AWS. *Cf. Rothschild*, 2015 WL 4624164, at *3 (claims against bank customers peripheral to claims against developer and supplier of accused mobile imaging technology).

Moreover, the adjudication of Voxer's claims against Twitch and AWS should be dispositive of its claims against ACI. The asserted patents are all asserted against Twitch and AWS. (D.I 1, ¶¶ 18, 75-142.) The sole accused product is Twitch.tv, operated by Twitch. (*Id.*, ¶¶ 1, 16.) Accordingly, "the issues of infringement and validity are common to [Twitch] and ACI." *In re Nintendo of Am., Inc.*, 756 F.3d 1363, 1366 (Fed. Cir. 2014). Voxer "has no claim against [ACI] unless the infringement claims against [Twitch] are resolved in favor of [Voxer]." *Id.* Even if Voxer were to establish lability, any damages claim against ACI would be duplicative of damages already awarded in connection with claims against Twitch and AWS. *See Rothschild*, 2015 WL 4624164, at *2 (severing claims because, *inter alia*, patentee could not collect additional damages from customers if it recovered damages from mobile technology supplier).

Finally, as demonstrated above, transfer of Voxer's remaining claims against Twitch and

AWS is warranted under 28 U.S.C. § 1404. (*See infra* Part V.A.)

The relevant circumstances here are like those in *Teleconference Systems*, where another court in this district severed and stayed patent infringement claims against a defendant it deemed "not an essential party" and transferred the remainder of the case to the Northern District of California. 676 F. Supp. 2d at 330. There, the court determined that defendants, other than Enbridge, had "significant contacts with California and minimal contacts with Delaware" and that "the interests of justice and judicial economy are furthered by the complete transfer of [the] action to California." *Id.* at 332, 336. The court severed and stayed the claims against Enbridge finding that it "play[ed] no meaningful role in the determination of the key infringement and invalidity issues in the litigation" and that none of the parties had identified "any key Enbridge witnesses, documents or evidence." *Id.* at 330. Like Enbridge, ACI is "not an essential party," will play "no meaningful role" in resolution of infringement and validity issues, and Voxer has not identified, and cannot identify, any key ACI witnesses, documents, or evidence.

Accordingly, the claims against ACI should be severed. *See In re Nintendo of Am.*, 756 F.3d at 1366; *Teleconference*, 676 F. Supp. 2d at 330.

2. Voxer's Claims Against ACI Should be Stayed

The claims against ACI should be stayed pending resolution of the claims against Twitch and AWS in the Northern District of California. "Courts generally consider three factors to determine whether a stay is appropriate: (1) whether granting the stay will simplify the issues for trial; (2) the status of the litigation, particularly whether discovery is complete and a trial date has been set; and (3) whether a stay would cause the non-movant to suffer undue prejudice from any delay or allow the movant to gain a clear tactical advantage." *Pers. Genomics Taiwan, Inc. v. Pac. Biosciences of California, Inc.,* No. 19-1810-GBW-MPT, 2022 WL 4245532, at *1 (D. Del. Sept. 15, 2022). All three factors favor a stay of the claims against ACI here.

As discussed above, adjudication of the claims against Twitch and AWS in the Northern District of California will be dispositive of the claims against ACI. *See supra* Part V.B.1. Staying the ACI claims will therefore undoubtedly simplify the issues for trial because no separate trial would be necessary upon resolution of Voxer's claims against Twitch and AWS.

This litigation also remains in its early stages. No document requests or interrogatories have been served, and Voxer's infringement contentions are not due until July. This factor favors staying the claims against ACI. *See Int'l Bus. Machines Corp. v. Zynga Inc.,* No. 22-590-GBW, 2023 WL 8275938, at *2 (D. Del. Nov. 30, 2023) (finding the second factor to weigh in favor of a stay because "the most burdensome stages of the cases—completing fact discovery, preparing expert reports, filing and responding to pretrial motions, preparing for trial, going through the trial process, and engaging in post-trial motions practice—all lie in the future").

Finally, staying the claims against ACI would not unduly prejudice Voxer. Voxer has not identified any separate infringing activity by ACI. (D.I. 14, 6-8.) At its core, this is a patent infringement suit against Twitch concerning Twitch.tv. Because the litigation would continue to proceed against Twitch and AWS, there would be no delay in resolution of Voxer's claims nor any tactical advantage for Twitch and AWS should the Court stay the claims against ACI.

Because all three factors favor a stay, the claims against ACI should be stayed. *See, e.g.*, *Rothschild*, 2015 WL 4624164, at *2 (severing and staying patent infringement claims against bank customers where transferred claims against mobile technology supplier would proceed and would dispose of claims against banks as users of same product).

VI. CONCLUSION

For the reasons set forth above, Defendants respectfully request that the Court sever and stay the claims against ACI, transfer the claims against AWS and Twitch to the Northern District of California, and grant whatever other and further relief it deems just and proper.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jennifer Ying

Jennifer Ying (#5550)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jying@morrisnichols.com

Attorneys for Defendants Amazon.com, Inc., Amazon Web Services, Inc., and Twitch Interactive, Inc.

OF COUNSEL:

Brian C. Nash
MORRISON & FOERSTER LLP
300 Colorado Street, Suite 1800
Austin, TX 78701
(512) 617-0650

Kyle W.K. Mooney
MORRISON & FOERSTER LLP
280 West 55th Street
New York, NY 10019
(212) 468-8000

Lily Yue Li
MORRISON & FOERSTER LLP
755 Page Mill Road
Palo Alto, CA 94304
(650) 813-5600

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CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2026, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on January 12, 2026, upon the following in the manner indicated:

Brian E. Farnan, Esquire — *VIA ELECTRONIC FILING*
FARNAN LLP
919 N. Market Street, 12th Floor
Wilmington, Delaware 19801
Attorneys for Plaintiffs Voxer, Inc. and Voxer IP LLC

Kyle A. Lonergan, Esquire — *VIA ELECTRONIC FILING*
Eliza Beeney, Esquire
MCKOOL SMITH, P.C.
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Attorneys for Plaintiffs Voxer, Inc. and Voxer IP LLC

Nicholas Mathews, Esquire — *VIA ELECTRONIC FILING*
Warren Lipschitz, Esquire
MCKOOL SMITH, P.C.
300 Crescent Court Suite 1500
Dallas, TX 75201
Attorneys for Plaintiffs Voxer, Inc. and Voxer IP LLC

James Quigley, Esquire — *VIA ELECTRONIC FILING*
MCKOOL SMITH, P.C.
303 Colorado Street, Suite 2100
Austin, TX 78701
Attorneys for Plaintiffs Voxer, Inc. and Voxer IP LLC

Clara Bourget, Esquire
McKool Smith, P.C.
300 South Grand Avenue, Suite 2900
Los Angeles, CA 90071
Attorneys for Plaintiffs Voxer, Inc. and Voxer IP LLC

VIA ELECTRONIC FILING

/s/ Jennifer Ying

Jennifer Ying (#5550)

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