

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TEXAS, MARSHALL DIVISION

Knossos Global Systems LLC v. Zoho Corporation Private Limited

No. 2:25-cv-00414-JRG-RSP (E.D. Tex. Mar. 25, 2026) · No. 2:25-cv-00414-JRG-RSP · Decided March 26, 2026

SUMMARY

The United States District Court for the Eastern District of Texas denied Zoho Corporation Private Limited’s motion to transfer a patent infringement action to the Western District of Texas under 28 U.S.C. § 1404(a). The court concluded that the private and public interest factors were neutral or did not favor transfer, particularly because relevant evidence and witnesses were primarily located in India and the alleged infringement involved an email product accessible from both districts.

CASE DETAILS

COURT	United States District Court for the Eastern District of Texas, Marshall Division
WRITING FOR THE COURT	Roy S. Payne
JURISDICTION	United States District Court for the Eastern District of Texas, Marshall Division
DECIDED	March 26, 2026
DOCKET	2:25-cv-00414-JRG-RSP
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved under 28 U.S.C. § 1404(a) to transfer the patent-infringement action from the Eastern District of Texas to the Western District of Texas.
STANDARD OF REVIEW	For a § 1404(a) transfer motion, the movant must first establish that the action could have been brought in the proposed transferee forum and then must clearly demonstrate that the transferee forum is clearly more convenient. The court may consider undisputed facts outside the pleadings, drawing reasonable inferences and resolving factual disputes in favor of the nonmovant.
PRECEDENTIAL VALUE	Unknown

TOPICS

venue

civil procedure

patent infringement

commercial litigation

PRACTICE AREAS

civil procedure

patent litigation

venue and transfer

QUESTIONS PRESENTED

1. Whether venue for the patent-infringement action was proper in the Eastern District of Texas under 28 U.S.C. § 1400(b).
2. Whether the action could have been brought in the Western District of Texas for purposes of 28 U.S.C. § 1404(a).
3. Whether the private and public interest factors made the Western District of Texas clearly more convenient than the Eastern District of Texas.

HOLDINGS

1. Venue was proper in the Eastern District of Texas because Zoho, a foreign company, was treated as residing in any judicial district for purposes of the patent venue statute, and § 1400(b) permitted the patent-infringement action to be brought in either Texas district.
2. Transfer to the Western District of Texas was not warranted because none of the private interest factors favored transfer and the disputed public-interest local-interest factor also did not favor transfer.

KEY QUOTATIONS

“The Court is of the opinion that no private interest factor favors transfer.”

“Therefore, the Court finds that the private interest factors do not favor transfer.”

“Therefore, the Court finds that the public interest factors do not favor transfer.”

FACTUAL BACKGROUND

Zoho is a foreign company whose accused email product was developed largely in Chennai, India. Zoho argued that Austin-based marketing, sales, financial documents, and U.S.-based employees supported transfer to the Western District of Texas. The court found that the bulk of the relevant evidence and witnesses were in India, that the marginal travel difference between Austin and Marshall was insignificant, and that Zoho's U.S. subsidiary had insufficient connection to the alleged infringement.

PROCEDURAL HISTORY

Knossos Global Systems LLC filed a patent-infringement action against Zoho Corporation Private Limited in the Eastern District of Texas. Zoho moved to transfer the case to the Western District of Texas based principally on its Austin-area operations and witnesses. The court denied the motion after concluding that venue was proper in the Eastern District and that the private and public interest factors did not favor transfer.

DISPOSITION

other

CASES CITED

- TC Heartland LLC v. Kraft Foods Grp. Brands LLC, 581 U.S. 258, 266 (2017)
- Fourco Glass Co. v. Transmirra Prod. Corp., 353 U.S. 222, 229 (1957)
- In re: Cray Inc., 871 F.3d 1355, 1360 (Fed. Cir. 2017)
- In re: ZTE (USA) Inc., 890 F.3d 1008, 1013–14 (Fed. Cir. 2018)
- AGIS Software v. T-Mobile USA Inc., No. 2:21-cv-72-JRG-RSP, 2021 WL 6616856, at *1 (E.D. Tex. Nov. 10, 2021)
- Ambraco, Inc. v. Bossclip B.V., 570 F.3d 233, 238 (5th Cir. 2009)
- In re Volkswagen AG, 371 F.3d 201, 202–03 (5th Cir. 2004)
- In re Volkswagen of Am., Inc., 545 F.3d 304, 312, 314–15 (5th Cir. 2008)
- Humble Oil & Ref. Co. v. Bell Marine Serv., Inc., 321 F.2d 53, 56 (5th Cir. 1963)
- In re Apple Inc., 979 F.3d 1332, 1338 (Fed. Cir. 2020)
- Quest NetTech Corp. v. Apple, Inc., No. 2:19-cv-118, 2019 WL 6344267, at *7 (E.D. Tex. Nov. 27, 2019)
- Vocalife LLC v. Amazon.com, Inc., No. 2:19-cv-00123, 2019 U.S. Dist. LEXIS 205696, 2019 WL 6345191, at *2 (E.D. Tex. Nov. 27, 2019)
- Trois v. Apple Tree Auction Cent. Inc., 882 F.3d 485, 492–93 (5th Cir. 2018)
- Mohamed v. Mazda Motor Corp., 90 F. Supp. 2d 757, 776 (E.D. Tex. 2000)

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