

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

REMOTE LOCATOR SYSTEMS, LLC,

Plaintiff,

v.

**WORLDWIDE EQUIPMENT SALES,
LLC D/B/A DRIVERLOCATE.COM,**

Defendant.

CIVIL ACTION NO. 2:14-cv-337

JURY TRIAL DEMANDED

PLAINTIFF'S ORIGINAL COMPLAINT

This is an action for patent infringement in which Remote Locator Systems LLC ("RLS") makes the following allegations against Worldwide Equipment Sales, LLC d/b/a DriverLocate.com ("Defendant" or "DriverLocate.com"):

PARTIES

1. Remote Locator Systems LLC is a limited liability company formed under the laws of the State of Texas with a principle place of business located in Plano, Texas, 75020.

2. Defendant Worldwide Equipment Sales, LLC d/b/a DriverLocate.com is a company organized and existing under the laws of the state of Illinois with a principal place of business located at 601 Walnut Court, Rockdale, Illinois 60436. DriverLocate.com can be served via its registered agent for service of process: Cathy Winer at 11643 Brook Hill Dr., Orlando Park, IL 60467.

JURISDICTION AND VENUE

3. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284 - 85, among others. This Court has subject matter jurisdiction over this action under 28 U.S.C. §1331 and §1338(a).

4. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400(b). Upon information and belief, Defendant has transacted business in this district, and has committed and/or induced acts of patent infringement in this district.

5. Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to Defendant's substantial business in this forum, 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 in this district.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 5,548,637

6. On August 20, 1996, United States Patent No. 5,548,637 (the "'637 patent") was duly and legally issued by the United States Patent and Trademark Office for an invention entitled "Method and Apparatus for Locating Personnel and Objects in Response to Telephone Inquiries". A true and correct copy of the '637 patent is attached hereto as Exhibit A.

7. Remote Locator Systems is the owner of the '637 patent with all substantive rights in and to that patent, including the sole and exclusive right to prosecute this action and enforce the '637 patent against infringers, and to collect damages for all relevant times.

8. DriverLocate.com directly or through intermediaries, made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or systems (including at least its CDMA/GSM/GPRS Cellular Network and GPS Tracking Devices) that directly infringed one or more claims of the '637 patent.

JURY DEMAND

Remote Locator Systems hereby requests a trial by jury on all issues so triable by right.

PRAYER FOR RELIEF

Remote Locator Systems requests that the Court find in its favor and against Defendant, and that the Court grant Remote Locator Systems the following relief:

- a. Judgment that one or more claims of the '637 patent have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that Defendant account for and pay to Remote Locator Systems all damages and costs incurred by Remote Locator Systems, caused by Defendant's infringing activities and other conduct complained of herein;
- c. That Remote Locator Systems be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein;
- d. That Remote Locator Systems be granted such other and further relief as the Court may deem just and proper under the circumstances.

Dated: April 14, 2014

Respectfully submitted,

By: /s/ Austin Hansley
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