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7 Attorneys for Plaintiff  
SIGNAL IP, INC.

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

11 SIGNAL IP, INC., a California  
12 corporation,

13 Plaintiff,

14 vs.

15 CHRYSLER GROUP LLC, a Delaware  
16 limited liability company,

17 Defendant.

Case No. 2:14-cv-03105-JAK (JEMx)

**FIRST AMENDED COMPLAINT  
FOR PATENT INFRINGEMENT**

**JURY TRIAL DEMANDED**

Hon. John A. Kronstadt

18 Plaintiff Signal IP, Inc. (“Signal IP” or “Plaintiff”) brings this First Amended  
19 Complaint against Defendant Chrysler Group LLC (“Chrysler” or “Defendant”), as  
20 permitted by Fed. R. Civ. P. 15(a)(2) and pursuant to written consent provided by  
21 Defendants on June 9, 2014, alleging as follows:

22 **PARTIES**

23 1. Plaintiff Signal IP is a California corporation with its principal place of  
24 business at 11100 Santa Monica Blvd., Suite 380, Los Angeles, CA 90025.

25 2. On information and belief, Defendant Chrysler Group LLC is a  
26 Delaware limited liability company with its principal place of business at 1000  
27 Chrysler Drive, Auburn Hills, Michigan 48326-2766.

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**JURISDICTION, VENUE AND JOINDER**

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

4. This Court has personal jurisdiction over Defendant. Defendant has conducted extensive commercial activities and continues to conduct extensive commercial activities within the State of California. Additionally, on information and belief, Defendant, directly and/or through intermediaries (including Defendants’ entities, subsidiaries, distributors, sales agents, partners and others), distributes, offers for sale, sells, and/or advertises its products (including but not limited to the products and services that are accused of infringement in this lawsuit) in the United States, in the State of California, and in this judicial district, under the “Chrysler”, “Dodge”, “Jeep” and “Maserati” brand names. Defendant has purposefully and voluntarily placed one or more of its infringing products and services into the stream of commerce with the expectation that the products and services will be purchased or used by customers in California and within this judicial district. Accordingly, Defendant has infringed Signal IP’s patents within the State of California and in this judicial district as alleged in more detail below.

5. Venue is proper in this district under 28 U.S.C. §§ 1391 and 1400(b).

**BACKGROUND**

6. Signal IP, Inc. is a California corporation with a principal place of business at 11100 Santa Monica Blvd., Suite 380, Los Angeles, CA 90025. It is the owner of the entire right, title and interest in and to U.S. Patent Nos. 5,714,927; 5,732,375; 6,434,486; 6,012,007; and 5,463,374 (the “Patents-in-Suit”).

7. On information and belief, Defendant is a direct or indirect subsidiary of global car manufacturer and distributor Fiat S.p.A., which is headquartered in Italy. Fiat S.p.A. manufactures and distributes cars under the “Fiat”, “Chrysler”, “Dodge”, “Jeep” and “Maserati” brand names.

1 8. Defendant has had knowledge of the Patents-in-Suit at least as of the  
 2 filing of the original complaint in this action on April 23, 2014. Defendant is liable  
 3 for indirect infringement and willful infringement of the Patents-in-Suit, as alleged  
 4 below, at least as of the filing of the original complaint in this action on April 23,  
 5 2014.

6 **FIRST CLAIM FOR RELIEF**  
 7 **(Infringement of the ‘927 Patent)**

8 9. Plaintiff incorporates paragraphs 1 through 8 of this complaint as if set  
 9 forth in full herein.

10 10. Signal IP is the owner of the entire right, title, and interest in and to  
 11 U.S. Patent No. 5,714,927 (the ‘927 Patent), entitled “Method of Improving Zone of  
 12 Coverage Response of Automotive Radar.” The ‘927 Patent was duly and legally  
 13 issued by the U.S. Patent and Trademark Office on February 3, 1998. A true and  
 14 correct copy of the ‘927 Patent is attached as Exhibit A.

15 11. Defendant has directly infringed and continues to infringe, literally  
 16 and/or under the doctrine of equivalents, the ‘927 Patent by making, using, offering  
 17 for sale, and/or selling in the United States certain methods or systems disclosed and  
 18 claimed in the ‘927 Patent, including but not limited to the Blind Spot Monitoring  
 19 system, used in products including but not limited to the Chrysler 200, 300, and  
 20 Town & Country, the Dodge Charger, Dart, Durango, Grand Caravan, and Ram  
 21 Cargo Van, and the Jeep Cherokee and Grand Cherokee.

22 12. Defendant has contributorily infringed and is currently contributorily  
 23 infringing the ‘927 Patent by making, using, offering for sale, and/or selling in the  
 24 United States certain methods or systems disclosed and claimed in the ‘927 Patent,  
 25 including but not limited to the Blind Spot Monitoring system, used in products  
 26 including but not limited to the Chrysler 200, 300, and Town & Country, the Dodge  
 27 Charger, Dart, Durango, Grand Caravan, and Ram Cargo Van, and the Jeep  
 28 Cherokee and Grand Cherokee.

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1 13. Defendants has actively induced and is actively inducing the  
2 infringement of the ‘927 Patent by making, using, offering for sale, and/or selling in  
3 the United States certain methods or systems disclosed and claimed in the ‘927  
4 Patent, including but not limited to the Blind Spot Monitoring system, used in  
5 products including but not limited to the Chrysler 200, 300, and Town & Country,  
6 the Dodge Charger, Dart, Durango, Grand Caravan, and Ram Cargo Van, and the  
7 Jeep Cherokee, and Grand Cherokee.

8 14. Defendant’s infringement of the ‘927 Patent has been and continues to  
9 be willful, rendering this case exceptional within the meaning of 35 U.S.C. § 285.

10 15. Unless enjoined by this Court, Defendant will continue to infringe the  
11 ‘927 Patent.

12 16. As a direct and proximate result of the Defendant’s conduct, Plaintiff  
13 has suffered, and will continue to suffer, irreparable injury for which it has no  
14 adequate remedy at law. Plaintiff also has been damaged and, until an injunction  
15 issues, will continue to be damaged in an amount yet to be determined.

16 **SECOND CLAIM FOR RELIEF**

17 **(Infringement of the ‘375 Patent)**

18 17. Plaintiff incorporates paragraphs 1 through 16 of this complaint as if set  
19 forth in full herein.

20 18. Signal IP is the owner of the entire right, title, and interest in and to  
21 U.S. Patent No. 5,732,375 (the ‘375 Patent), entitled “Method of Inhibiting or  
22 Allowing Airbag Deployment.” The ‘375 Patent was duly and legally issued by the  
23 U.S. Patent and Trademark Office on March 24, 1998. A true and correct copy of  
24 the ‘375 Patent is attached as Exhibit B.

25 19. Defendant has directly infringed and continues to infringe, literally  
26 and/or under the doctrine of equivalents, the ‘375 Patent by making, using, offering  
27 for sale, and/or selling in the United States certain methods or systems disclosed and  
28 claimed in the ‘375 Patent, including but not limited to the Occupant Classification

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1 System, used in products including but not limited to the Chrysler 200, 300, Town  
2 & Country, Sebring, Aspen, and PT Cruiser, the Dodge (SRT) Viper, Avenger,  
3 Caliber, Challenger, Charger, Dart, Durango, Grand Caravan, Journey, Ram, Ram  
4 Cargo Van, Ram Promaster, Dakota, Magnum, and Nitro, and the Jeep Cherokee,  
5 Compass, Grand Cherokee, Liberty, Patriot, and Wrangler.

6 20. Defendant has contributorily infringed and is currently contributorily  
7 infringing the ‘375 Patent by making, using, offering for sale, and/or selling in the  
8 United States certain methods or systems disclosed and claimed in the ‘375 Patent,  
9 including but not limited to the Occupant Classification System, used in products  
10 including but not limited to the Chrysler 200, 300, Town & Country, Sebring,  
11 Aspen, and PT Cruiser, the Dodge (SRT) Viper, Avenger, Caliber, Challenger,  
12 Charger, Dart, Durango, Grand Caravan, Journey, Ram, Ram Cargo Van, Ram  
13 Promaster, Dakota, Magnum, and Nitro, and the Jeep Cherokee, Compass, Grand  
14 Cherokee, Liberty, Patriot, and Wrangler.

15 21. Defendant has actively induced and is actively inducing the  
16 infringement of the ‘375 Patent by making, using, offering for sale, and/or selling in  
17 the United States certain methods or systems disclosed and claimed in the ‘375  
18 Patent, including but not limited to the Occupant Classification System, used in  
19 products including but not limited to the Chrysler 200, 300, Town & Country,  
20 Sebring, Aspen, and PT Cruiser, the Dodge (SRT) Viper, Avenger, Caliber,  
21 Challenger, Charger, Dart, Durango, Grand Caravan, Journey, Ram, Ram Cargo  
22 Van, Ram Promaster, Dakota, Magnum, and Nitro, and the Jeep Cherokee,  
23 Compass, Grand Cherokee, Liberty, Patriot, and Wrangler.

24 22. Defendant’s infringement of the ‘375 Patent has been and continues to  
25 be willful, rendering this case exceptional within the meaning of 35 U.S.C. § 285.

26 23. Unless enjoined by this Court, Defendant will continue to infringe the  
27 ‘375 Patent.

28 24. As a direct and proximate result of the Defendant’s conduct, Plaintiff

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1 has suffered, and will continue to suffer, irreparable injury for which it has no  
2 adequate remedy at law. Plaintiff also has been damaged and, until an injunction  
3 issues, will continue to be damaged in an amount yet to be determined.

4 **THIRD CLAIM FOR RELIEF**

5 **(Infringement of the ‘486 Patent)**

6 25. Plaintiff incorporates paragraphs 1 through 23 of this complaint as if set  
7 forth in full herein.

8 26. Signal IP is the owner of the entire right, title, and interest in and to  
9 U.S. Patent No. 6,434,486 (the ‘486 Patent), entitled “Technique for Limiting the  
10 Range of an Object Sensing System in a Vehicle.” The ‘486 Patent duly and legally  
11 issued by the U.S. Patent and Trademark Office on August 13, 2002. A true and  
12 correct copy of the ‘486 Patent is attached as Exhibit C.

13 27. Defendant has directly infringed and continues to infringe, literally  
14 and/or under the doctrine of equivalents, the ‘486 Patent by making, using, offering  
15 for sale, and/or selling in the United States certain methods or systems disclosed and  
16 claimed in the ‘486 Patent, including but not limited to collision prevention or  
17 avoidance systems, including but not limited to the (1) Adaptive Cruise Control  
18 system, used in products including but not limited to the Chrysler 200, 300, Town &  
19 Country, Crossfire, Pacific, and PT Cruiser, and the Dodge Charger, Durango,  
20 Grand Caravan, Journey, Dakota, and Nitro; and (2) the Forward Collision Warning  
21 Plus system, used in products including but not limited to the Jeep Cherokee and  
22 Grand Cherokee.

23 28. Defendant has contributorily infringed and is currently contributorily  
24 infringing the ‘486 Patent by making, using, offering for sale, and/or selling in the  
25 United States certain methods or systems disclosed and claimed in the ‘486 Patent,  
26 including but not limited to collision prevention or avoidance systems, including but  
27 not limited to the (1) Adaptive Cruise Control system, used in products including  
28 but not limited to the Chrysler 200, 300, Town & Country, Crossfire, Pacific, and

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1 PT Cruiser, and the Dodge Charger, Durango, Grand Caravan, Journey, Dakota, and  
2 Nitro; and (2) the Forward Collision Warning Plus system, used in products  
3 including but not limited to the Jeep Cherokee and Grand Cherokee.

4 29. Defendant has actively induced and is actively inducing the  
5 infringement of the ‘486 Patent by making, using, offering for sale, and/or selling in  
6 the United States certain methods or systems disclosed and claimed in the ‘486  
7 Patent, including but not limited to collision prevention or avoidance systems,  
8 including but not limited to the (1) Adaptive Cruise Control system, used in  
9 products including but not limited to the Chrysler 200, 300, Town & Country,  
10 Crossfire, Pacific, and PT Cruiser, and the Dodge Charger, Durango, Grand  
11 Caravan, Journey, Dakota, and Nitro; and (2) the Forward Collision Warning Plus  
12 system, used in products including but not limited to the Jeep Cherokee and Grand  
13 Cherokee.

14 30. Defendant’s infringement of the ‘486 Patent has been and continues to  
15 be willful, rendering this case exceptional within the meaning of 35 U.S.C. § 285.

16 31. Unless enjoined by this Court, Defendant will continue to infringe the  
17 ‘486 Patent.

18 32. As a direct and proximate result of the Defendant’s conduct, Plaintiff  
19 has suffered, and will continue to suffer, irreparable injury for which it has no  
20 adequate remedy at law. Plaintiff also has been damaged and, until an injunction  
21 issues, will continue to be damaged in an amount yet to be determined.

22 **FOURTH CLAIM FOR RELIEF**

23 **(Infringement of the ‘007 Patent)**

24 33. Plaintiff incorporates paragraphs 1 through 32 of this complaint as if set  
25 forth in full herein.

26 34. Signal IP is the owner of the entire right, title, and interest in and to  
27 U.S. Patent No. 6,012,007 (the ‘007 Patent), entitled “Occupant Detection Method  
28 and Apparatus for Air Bag System.” The ‘007 Patent was duly and legally issued by

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1 the U.S. Patent and Trademark Office on January 4, 2000. A true and correct copy  
2 of the '007 Patent is attached as Exhibit D.

3 35. Defendant has directly infringed and continues to infringe, literally  
4 and/or under the doctrine of equivalents, the '007 Patent by making, using, offering  
5 for sale, and/or selling in the United States certain methods or systems disclosed and  
6 claimed in the '007 Patent, including but not limited to the Occupant Classification  
7 System, used in products including but not limited to the Chrysler 200, 300, Town  
8 & Country, Sebring, Aspen, Crossfire, Pacific, and PT Cruiser, the Dodge (SRT)  
9 Viper, Avenger, Caliber, Challenger, Charger, Dart, Durango, Grand Caravan,  
10 Journey, Ram, Ram Cargo Van, Ram Promaster, Dakota, Magnum, and Nitro, and  
11 Jeep Cherokee, Compass, Grand Cherokee, Liberty, Patriot, and Wrangler.

12 36. Defendant has contributorily infringed and is currently contributorily  
13 infringing the '007 Patent by making, using, offering for sale, and/or selling in the  
14 United States certain methods or systems disclosed and claimed in the '007 Patent,  
15 including but not limited to the Occupant Classification System, used in products  
16 including but not limited to the Chrysler 200, 300, Town & Country, Sebring,  
17 Aspen, Crossfire, Pacific, and PT Cruiser, the Dodge (SRT) Viper, Avenger,  
18 Caliber, Challenger, Charger, Dart, Durango, Grand Caravan, Journey, Ram, Ram  
19 Cargo Van, Ram Promaster, Dakota, Magnum, and Nitro, and Jeep Cherokee,  
20 Compass, Grand Cherokee, Liberty, Patriot, and Wrangler.

21 37. Defendant has actively induced and is actively inducing the  
22 infringement of the '007 Patent by making, using, offering for sale, and/or selling in  
23 the United States certain methods or systems disclosed and claimed in the '007  
24 Patent, including but not limited to the Occupant Classification System, used in  
25 products including but not limited to the Chrysler 200, 300, Town & Country,  
26 Sebring, Aspen, Crossfire, Pacific, and PT Cruiser, the Dodge (SRT) Viper,  
27 Avenger, Caliber, Challenger, Charger, Dart, Durango, Grand Caravan, Journey,  
28 Ram, Ram Cargo Van, Ram Promaster, Dakota, Magnum, and Nitro, and Jeep



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1 Cherokee, Compass, Grand Cherokee, Liberty, Patriot, and Wrangler.

2 38. Defendant’s infringement of the ‘007 Patent has been and continues to  
3 be willful, rendering this case exceptional within the meaning of 35 U.S.C. § 285.

4 39. Unless enjoined by this Court, Defendant will continue to infringe on  
5 the ‘007 Patent.

6 40. As a direct and proximate result of the Defendant’s conduct, Plaintiff  
7 has suffered, and will continue to suffer, irreparable injury for which it has no  
8 adequate remedy at law. Plaintiff also has been damaged and, until an injunction  
9 issues, will continue to be damaged in an amount yet to be determined.

10 **FIFTH CLAIM FOR RELIEF**

11 **(Infringement of the ‘374 Patent)**

12 41. Plaintiff incorporates paragraphs 1 through 40 of this complaint as if set  
13 forth in full herein.

14 42. Signal IP is the owner of the entire right, title, and interest in and to  
15 U.S. Patent No. 5,463,374 (the ‘374 Patent), entitled “Method and Apparatus for  
16 Tire Pressure Monitoring and for Shared Keyless Entry Control.” The ‘374 Patent  
17 was duly and legally issued by the U.S. Patent and Trademark Office on October 31,  
18 1995. A true and correct copy of the ‘374 Patent is attached as Exhibit E.

19 43. Defendant has directly infringed, literally and/or under the doctrine of  
20 equivalents, the ‘374 Patent by making, using, offering for sale, and/or selling in the  
21 United States certain methods or systems for vehicles disclosed and claimed in the  
22 ‘374 Patent, including but not limited to the integrated Remote Keyless Entry (RKE)  
23 and Tire Pressure Monitor Systems (TPMS), used in products including but not  
24 limited to the Chrysler 300, and Town & Country, the Dodge Challenger, Charger,  
25 Durango, Grand Caravan, Journey, Ram, Ram Cargo Van, Ram Promaster, and  
26 Magnum, and Jeep Grand Cherokee.

27 44. Defendant has contributorily infringed the ‘374 Patent by making,  
28 using, offering for sale, and/or selling in the United States certain methods or

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1 systems disclosed and claimed in the ‘374 Patent, including but not limited to the  
2 integrated Remote Keyless Entry (RKE) and Tire Pressure Monitor Systems  
3 (TPMS), used in products including but not limited to the Chrysler 300, and Town  
4 & Country, the Dodge Challenger, Charger, Durango, Grand Caravan, Journey,  
5 Ram, Ram Cargo Van, Ram Promaster, and Magnum, and Jeep Grand Cherokee.

6 45. Defendant has actively induced infringement of the ‘374 Patent by  
7 making, using, offering for sale, and/or selling in the United States certain methods  
8 or systems disclosed and claimed in the ‘374 Patent, including but not limited to the  
9 integrated Remote Keyless Entry (RKE) and Tire Pressure Monitor Systems  
10 (TPMS), used in products including but not limited to the Chrysler 300, and Town  
11 & Country, the Dodge Challenger, Charger, Durango, Grand Caravan, Journey,  
12 Ram, Ram Cargo Van, Ram Promaster, and Magnum, and Jeep Grand Cherokee.

13 46. As a direct and proximate result of Defendant’s conduct, Plaintiff has  
14 suffered irreparable injury for which it has no adequate remedy at law. Plaintiff also  
15 has been damaged in an amount yet to be determined.

16 **PRAYER FOR RELIEF**

17 Wherefore, Signal IP respectfully requests that the Court enter judgment  
18 against Defendant as follows:

- 19 1. That Defendant has directly infringed the Patents-in-Suit;
- 20 2. That Defendant has contributorily infringed the Patents-in-Suit;
- 21 3. That Defendant has induced the infringement of the Patents-in-Suit;
- 22 4. That Defendant’s infringement be adjudged willful and deliberate;
- 23 5. That Defendant and its affiliates, subsidiaries, officers, directors,  
24 employees, agents, representatives, successors, assigns, and all those acting in  
25 concert, participation, or privity with them or on their behalf, including customers,  
26 be enjoined from infringing, inducing others to infringe or contributing to the  
27 infringement of the Patents-in-Suit;
- 28 6. For damages, according to proof, for Defendant’s infringement,

1 together with pre-judgment and post-judgment interest, as allowed by law and that  
2 such damages be trebled as provided by 35 U.S.C. § 284;

3 7. That this Court determine that this is an exceptional case under 35  
4 U.S.C. § 285 and an award of attorneys' fees and costs to Signal IP is warranted;  
5 and

6 8. For such other and further relief as the Court may deem just and proper.  
7

8 Dated: June 11, 2014

LINER LLP

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11 By:           /s/ Ryan E. Hatch          

Randall J. Sunshine

Ryan E. Hatch

Jason L. Haas

Attorneys for Plaintiff SIGNAL IP, INC.

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