

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROTHSCHILD LOCATION  
TECHNOLOGIES, LLC,

Plaintiff,

v.

VOLVO CARS OF NORTH AMERICA,  
LLC,

Defendant.

C.A. No.

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff Rothschild Location Technologies, LLC (“Rothschild” or “Plaintiff”) files this Complaint for patent infringement against Volvo Cars of North America, LLC (“Volvo” or “Defendant”) alleging as follows:

**PARTIES**

1. Plaintiff Rothschild is a limited liability company organized under the laws of the state of Delaware having a principal place of business of 1108 Kane Concourse, Suite 310, Bay Harbor Islands, FL 33154.

2. On information and belief, Defendant Volvo is a limited liability company organized and existing under the laws of the State of Delaware, with its principal place of business located at 1 Volvo Drive, P.O. Box 914, Rockleigh, New Jersey 07647. On information and belief, Volvo may be served via its registered agent, The Corporation Trust Company, Corporation Trust Center 1209 Orange St., Wilmington, DE 19801.

**JURISDICTION AND VENUE**

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. Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b). On information and belief, Defendant has transacted business in this district, and has committed acts of patent infringement in this district.

5. The Court has personal jurisdiction over Volvo, as it has availed itself, under the Delaware Long Arm Statute, of the rights and benefits of this District by conducting business in this jurisdiction, including by promoting products for sale via the internet, which are accessible to and accessed by residents of this District.

**U.S. PATENT NO. 7,917,285**

6. Plaintiff is the owner by assignment of United States Patent No. 7,917,285 (the “’285 Patent”) entitled “Device, system and method for remotely entering, storing and sharing addresses for a positional information device.” The ’285 Patent issued on March 29, 2011. A true and correct copy of the ’285 Patent is attached as Exhibit A.

7. Mr. Leigh M. Rothschild is listed as the inventor on the ’285 Patent.

8. On information and belief, to the extent any marking was required by 35 U.S.C. § 287, predecessors in interest to the ’285 Patent complied with such requirements.

**COUNT I**  
**(INFRINGEMENT OF U.S. PATENT NO. 7,917,285)**

9. Volvo has, pursuant to 35 U.S.C. § 271, infringed and continues to infringe, the ’285 Patent in the State of Delaware, in this judicial district, and/or elsewhere in the United States by, among other things, making, using, selling, offering to sell, and/or importing, without

license, systems for remotely entering and sharing location information, such as Volvo's Sensus Connect.

10. Volvo's Sensus Connect falls within the scope of at least claim 1 of the '285 Patent, as evidenced by Volvo's product descriptions. For example, Volvo's Sensus Connect provides a system for remotely entering location information into a positional information device. *See* <http://https://www.media.volvocars.com/us/en-us/media/pressreleases/137382/volvo-cars-cloud-solution-offers-total-connectivity>. The Sensus Connect server is configured to receive a request of at least one location, determines the address of the at least one location and transmits the determined address to the positional information device. For example, Sensus Connect allows users to "sent [a location] straight to your Sensus Navigation, no matter where you are." <http://www.volvocars.com/us/top/about/Volvo-Sensus-Connect/Pages/navigation.aspx>.

11. As a result of Volvo's infringement of the '285 Patent, Plaintiff has suffered monetary damages in an amount not yet determined, and will continue to suffer damages in the future unless Volvo's infringing activities are enjoined by this Court..

12. Unless a permanent injunction is issued enjoining Volvo and its agents, servants, employees, attorneys, representatives, affiliates, and all others acting on their behalf from infringing the '285 Patent, Plaintiff will be irreparably harmed.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court enter:

1. A judgment in favor of Plaintiff that Volvo has infringed the '285 Patent;
2. A permanent injunction enjoining Volvo and its officers, directors, agents servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in

active concert therewith from infringement of the '285 Patent, or such other equitable relief the Court determines is warranted;

3. A judgment and order requiring Volvo pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '285 Patent as provided under 35 U.S.C. § 284, and an accounting of ongoing post-judgment infringement;

4. Any and all other relief, at law or equity, to which Plaintiff may show itself to be entitled.

**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.

September 4, 2014

BAYARD, P.A.

OF COUNSEL:

Neal G. Massand  
**Ni, Wang & Massand, PLLC**  
8140 Walnut Hill Ln., Ste. 310  
Dallas, TX 75231  
Tel: (972) 331-4600  
Fax: (972) 314-0900  
nmassand@nilawfirm.com

*/s/ Stephen B. Brauerman*  
Richard D. Kirk (rk0922)  
Stephen B. Brauerman (sb4952)  
Vanessa R. Tiradentes (vt5398)  
Sara E. Bussiere (sb5725)  
222 Delaware Avenue, Suite 900  
P.O. Box 25130  
Wilmington, DE 19899  
(302) 655-5000  
rkirk@bayardlaw.com  
sbrauerman@bayardlaw.com  
vtiradentes@bayardlaw.com  
sbussiere@bayardlaw.com

*Attorneys for Rothschild Location Technologies,  
LLC*