

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

ROTHSCHILD LOCATION
TECHNOLOGIES, LLC,

Plaintiff,

v.

TRIMBLE NAVIGATION LIMITED,

Defendant.

C.A. No.:

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Rothschild Location Technologies, LLC (“Rothschild” or “Plaintiff”) files this Complaint for patent infringement against Trimble Navigation Limited (“Trimble” or “Defendant”) alleging as follows:

PARTIES

1. Plaintiff Rothschild is 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 Trimble is a company organized and existing under the laws of the State of California, with its principal place of business located at 935 Stewart Drive, Sunnyvale, CA 94085. On information and belief, Trimble may be served via its registered agent, James A. Kirkland, 935 Stewart Drive, Sunnyvale, CA 94085.

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 Trimble, as it is incorporated in this state. Trimble has also 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. 8,606,503

6. Plaintiff is the owner by assignment of United States Patent No. 8,606,503 (the “’503 Patent”) entitled “Device, System and Method for Remotely Entering, Storing and Sharing Addresses for a Positional Information Device.” The ’503 Patent issued on December 10, 2013. A true and correct copy of the ’503 Patent is attached as Exhibit A.

7. Mr. Leigh M. Rothschild is listed as the inventor on the ’503 Patent.

8. On information and belief, to the extent any marking was required by 35 U.S.C. § 287, predecessors in interest to the ’503 Patent complied with such requirements.

COUNT I
(INFRINGEMENT OF U.S. PATENT NO. 8,606,503)

9. Trimble has, pursuant to 35 U.S.C. § 271, infringed and continues to infringe, the ’503 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 Trimble's Connected Farm Fleet.

10. Trimble's Connected Farm Fleet falls within the scope of at least claim 1 of the '503 Patent, as evidenced by Trimble's product descriptions. For example, Trimble's New Holland Connected Farm Fleet provides a method of entering location information. *See* <https://itunes.apple.com/us/app/connected-farm-fleet/id677321580?ls=1&mt=8>. Connected Farm Fleet receives a request from a first positional device for an address for at least one address stored in a second positional device, determining the second positional device, retrieving the at least one address of the second positional device, and transmitting the one address to the first positional devices. For example, Connected Farm Fleet allows the user to "view multiple equipment positions along with your current position overlaid on a background imagery or road maps." *See Id.*

11. As a result of Trimble's infringement of the '503 Patent, Plaintiff has suffered monetary damages in an amount not yet determined, and will continue to suffer damages in the future unless Trimble's infringing activities are enjoined by this Court.

12. Unless a permanent injunction is issued enjoining Trimble and its agents, servants, employees, attorneys, representatives, affiliates, and all others acting on their behalf from infringing the '503 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 Trimble has infringed the '503 Patent;

2. A permanent injunction enjoining Trimble and its officers, directors, agents servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement of the '503 Patent, or such other equitable relief the Court determines is warranted;

3. A judgment and order requiring Trimble pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '503 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.

December 23, 2014

BAYARD, P.A.

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