

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

**ROTHSCHILD LOCATION
TECHNOLOGIES LLC,**

Plaintiff,

v.

MOTOROLA SOLUTIONS, INC.,

Defendant.

Civil Action No. 6:15-cv-244

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT

Plaintiff Rothschild Location Technologies LLC (“Rothschild” or “Plaintiff”) files this Amended Complaint for patent infringement against Motorola Solutions, Inc. (“Motorola” or “Defendant”) alleging as follows:

PARTIES

1. Plaintiff Rothschild is limited liability company organized under the state of Texas having a principal place of business at 815 Brazos St., Ste. 500, Austin, TX 78701.

2. On information and belief, Defendant Motorola is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business located at 1303 East Algonquin Road, Schaumburg, IL 60196. On information and belief, Motorola may be served via its registered agent, The Corporation Trust Company, 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. 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 its 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 judicial 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. Motorola has, pursuant to 35 U.S.C. § 271, infringed and continues to infringe, the '285 Patent in the State of Texas, 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 Motorola's Fleet Management.

10. Motorola's Fleet Management falls within the scope of at least claim 1 of the '285 Patent, as evidenced by Motorola's product descriptions. For example, Motorola's Fleet Management provides a system for remotely entering location information into a positional information device. *See* <http://www.motorolasolutions.com/US-EN/Business+Solutions/Industry+Solutions/Transportation+and+Logistics/Fleet+Management+and+Delivery+Operations/Fleet+Management+Solutions>. The Fleet Management server is configured to receive a request of at least one location, determine the address of the at least one location and transmit the determined address to the positional information device. For example, Fleet Management provides for "dispatching and scheduling" as well as "optimizing routes." *Id.*

11. As a result of Motorola'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 Motorola's infringing activities are enjoined by this Court..

12. Unless a permanent injunction is issued enjoining Motorola 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 Motorola has infringed the '285 Patent;
2. A permanent injunction enjoining Motorola 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 Motorola 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.

DATED March 20, 2015.

Respectfully submitted,

By: /s/ Hao Ni

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