

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

**ROTHSCHILD LOCATION
TECHNOLOGIES LLC,**

Plaintiff,

v.

MEITRACK AMERICA CORPORATION,

Defendant.

Civil Action No. 6:15-cv-832

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT

Plaintiff Rothschild Location Technologies LLC (“Rothschild” or “Plaintiff”) files this Complaint for patent infringement against Defendant Meitrack America Corporation (“Meitrack” or “Defendant”) alleging as follows:

PARTIES

1. Plaintiff Rothschild is a limited liability company organized under the state of Texas having a principal place of business at 1400 Preston Road, Ste. 400, Plano, TX 75093.
2. Upon information and belief, Defendant Meitrack is a corporation organized and existing under the laws of the State of California, with its principal place of business located at 800 South Barranc Ave., Ste. 220, Covina, CA 91723. Upon information and belief, Meitrack may be served via its registered agent: Jie Chen at 1915 McKinley Ave., La Verne, CA 91750.

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. 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. Meitrack has, pursuant to 35 U.S.C. § 271, infringed and continues to infringe, the '503 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 Meitrack GPS tracking system. Meitrack GPS tracking system falls within the scope of at least claim 1 of the '503 Patent,

as evidenced by Meitrack's product descriptions. For example, Meitrack GPS tracking system provides a method of entering location information. See http://www.meitrackusa.com/wp-content/uploads/2015/04/Outline-Meritrack-Catalog_V15.1.1compressed.pdf.

10. Meitrack GPS tracking system receives a request from a first positional device for at least one address stored in a second positional device, determines the second positional device, retrieves at least one address of the second positional device, and transmits the one address to the first positional devices. For example, Meitrack GPS tracking system allows the user to view "historical route replay; historical information; tracking large amount of tracking devices, multiple maps available." See <http://www.meitrack.net/gps-tracking-software/>. Additionally, Meitrack GPS tracking system allows users to "view tracker's location from your PC, laptop, or mobile phone." See http://www.meitrack.net/meitrack-support/catalog/meitrack_catalog.pdf.

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

12. Unless a permanent injunction is issued enjoining Meitrack 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 Defendant has infringed the '503 Patent;
2. A permanent injunction enjoining Defendant 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 Defendant 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.

DATED September 3, 2015.

Respectfully submitted,

By: /s/ Hao Ni
Hao Ni
Texas Bar No. 24047205
hni@nilawfirm.com
Timothy T. Wang
Texas Bar No. 24067927
twang@nilawfirm.com
Neal G. Massand
Texas Bar No. 24039038
nmassand@nilawfirm.com
Stevenson Moore V
Texas Bar No. 24076573
smoore@nilawfirm.com
Krystal L. Gibbens
Texas Bar No. 24082185
kgibbens@nilawfirm.com

NI, WANG & MASSAND, PLLC
8140 Walnut Hill Ln., Ste. 500
Dallas, TX 75231
Tel: (972) 331-4600
Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFF
ROTHSCHILD LOCATION
TECHNOLOGIES LLC**