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

ROTHSCHILD LOCATION TECHNOLOGIES LLC, Plaintiff, v. **GOFLEET CORPORATION,** Defendant.	**Civil Action No. 6:15-cv-902** **JURY TRIAL DEMANDED**

ORIGINAL COMPLAINT

Plaintiff Rothschild Location Technologies LLC ("Rothschild" or "Plaintiff") files this Complaint for patent infringement against Defendant GoFleet Corporation ("GoFleet" 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, GoFleet Corporation is a Canadian corporation, with its principal place of business located at 2600 Skymark Ave., Building 7 Unit 101, Mississauga, ON L4W 5B2. Upon information and belief, Defendant may be served via its registered agent or director at the above address.

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. Defendant 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 GoFleet GPS tracking system. GoFleet GPS tracking system falls within the scope of at least claim 1 of the

’503 Patent, as evidenced by Defendant’s product descriptions. For example, GoFleet GPS tracking system provides a method of entering location information. *See http://www.gofleet.com/gps-tracking/.*

10. GoFleet 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, GoFleet GPS tracking system allows the user to “watch your vehicles moving on a map in real-time with our GPS vehicle tracking devices” *See http://www.gofleet.com/gps-vehicle-tracking-devices-increase-fleet-productivity/.* Additionally, GoFleet GPS tracking system allows users to “re-create any of your trips at any time for any specific date,” because GoFleet GPS tracking system stores all your trip history information. *Id.*

11. As a result of Defendant’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 Defendant’s infringing activities are enjoined by this Court.

12. Unless a permanent injunction is issued enjoining Defendant 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 October 15, 2015.

Respectfully submitted,

By: */s/ Hao Ni*

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