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

SECURENET SOLUTIONS GROUP, LLC, Plaintiff, v. SIGHTLOGIX, INC., Defendant.	Case No. 2:15-cv-1861 JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff SecureNet Solutions Group, LLC states its Complaint against SightLogix, Inc., and alleges as follows:

THE PARTIES

1. Plaintiff SecureNet Solutions Group, LLC is a limited liability company organized and existing under the laws of the State of Florida, with its principal place of business at 2073 Summit Lake Drive, Suite 155, Tallahassee, Florida 32317.

2. Defendant SightLogix, Inc. is a corporation organized and existing under the laws of Delaware, with its principal place of business at 745 Alexander Road, Princeton, New Jersey 08540. SightLogix's registered agent is Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.

JURISDICTION AND VENUE

3. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

4. This action is for patent infringement pursuant to the patent laws of the United States, 35 U.S.C. § 1, *et seq.* This Court has subject matter jurisdiction over the action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. Personal jurisdiction exists generally over Defendant because it has sufficient minimum contacts with the forum as a result of business conducted within the State of Texas and within the Eastern District of Texas. Defendant is registered to do business in the State of Texas. Personal jurisdiction also exists specifically over Defendant because it, directly or through subsidiaries or intermediaries, makes, uses, offers for sale, sells, imports, advertises, makes available and/or markets one or more products and/or services within the State of Texas, and more particularly, within the Eastern District of Texas, that infringe the patents-in-suit, as described more particularly below.

6. Venue is proper in the Eastern District of Texas pursuant to 28 U.S.C. §§ 1391 and 1400(b), because Defendant has committed acts of infringement in the Eastern District of Texas and has transacted business in the Eastern District of Texas. Among other things, on information and belief, SightLogix's manufacturer's representative for the accused products, Pinnacle Marketing, Inc., was based in Plano, Texas, and is currently based in Garland, Texas. Plaintiff has reason to believe that Pinnacle Marketing, through these activities, has also infringed the asserted patents. Plaintiff will seek discovery of Pinnacle Marketing's activities and, if appropriate, will move to join Pinnacle Marketing as a party to this lawsuit.

COUNT ONE
INFRINGEMENT OF U.S. PATENT NO. 8,130,098

7. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

8. Plaintiff is the owner of all right, title, and interest in United States Patent No. 8,130,098, entitled "Systems and Methods for Safety and Business Productivity," duly and legally issued by the United States Patent and Trademark Office on March 6, 2012 (the "'098 patent"). A true and correct copy of the '098 patent is attached hereto as Exhibit A.

9. The '098 patent generally describes and claims a safety system and method with one or more sensors for capturing sensory data; a data storage device for storing the sensory data; and one or more memories or a data processing unit to: process the sensory data, weighted by

attribute data representing information about the sensors; detect primitive events in the sensory data; correlate two or more primitive events to determine one or more correlated events; and perform one or more actions to ensure that safety procedures are followed based on the correlation.

10. Defendant has infringed and continues to infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’098 patent under 35 U.S.C. § 271 by making, using, offering to sell, selling, and/or importing into the United States the patented invention within the United States. Specifically, Defendant has infringed and continues to infringe the ’098 patent by making, using, offering to sell, selling, and/or importing into the United States the SightLogix Video Perimeter Security System including the SightSensor thermal cameras (such as the Thermal SightSensor cameras and the SightSensor XA cameras).

11. As a result of Defendant’s infringing activities with respect to the ’098 patent, Plaintiff has suffered damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate to compensate it for Defendant’s infringing activities in an amount to be determined at trial, but in no event less than reasonable royalties, together with interest and costs. Defendant’s infringement of Plaintiff’s exclusive rights under the ’098 patent will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

COUNT TWO
INFRINGEMENT OF U.S. PATENT NO. 8,354,926

12. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

13. Plaintiff is the owner of all right, title, and interest in United States Patent No. 8,354,926, entitled “Systems and Methods for Business Process Monitoring” duly and legally issued by the United States Patent and Trademark Office on January 15, 2013 (the “’926 patent”). A true and correct copy of the ’926 patent is attached hereto as Exhibit B.

14. The ’926 patent generally describes and claims a business process monitoring system and method with one or more sensors for capturing sensory data; a data storage device for storing the sensory data; and one or more memories or a data processing unit to: process the sensory data to detect primitive events; correlate two or more primitive events, weighted by attribute data representing information about the sensors, to determine one or more correlated events; and to perform one or more actions to ensure that business processes are followed based on the correlation.

15. Defendant has infringed and continues to infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’926 patent under 35 U.S.C. § 271 by making, using, offering to sell, selling, and/or importing into the United States the patented invention within the United States. Specifically, Defendant has infringed and continues to infringe the ’926 patent by making, using, offering to sell, selling, and/or importing into the United States the SightLogix Video Perimeter Security System including the SightSensor thermal cameras (such as the Thermal SightSensor cameras and the SightSensor XA cameras).

16. As a result of Defendant’s infringing activities with respect to the ’926 patent, Plaintiff has suffered damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate to compensate it for Defendant’s infringing activities in an amount to be determined at trial, but in no event less than reasonable royalties, together with interest and costs. Defendant’s infringement of Plaintiff’s exclusive rights under the ’926 patent will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

PRAYER FOR RELIEF

Plaintiff requests entry of judgment in its favor against Defendant for the following:

a) A declaration that Defendant has infringed one or more claims of the patents-in-suit;

b) An award of damages adequate to compensate Plaintiff for Defendant's infringement of the patents-in-suit, but in no event less than a reasonable royalty, together with prejudgment and post-judgment interest and costs, in an amount according to proof;

c) An entry of a permanent injunction enjoining Defendant, and its respective officers, agents, employees, and those acting in privity with it, from further infringement of the patents-in-suit, or in the alternative, awarding a royalty for post-judgment infringement; and

d) An award to Plaintiff of such other costs and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury.

Dated: November 24, 2015

Respectfully submitted,

/s/ Charles Ainsworth
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