

principal place of business at 55 Glenlake Parkway, N.E., Atlanta, Georgia 30328, and has appointed Corporation Service Company, 2711 Centerville Rd., Suite 400, Wilmington, DE as its agent for service of process. On information and belief, Defendant UPS America is a Delaware corporation having a principal place of business 55 Glenlake Parkway, N.E., Atlanta, Georgia 30328, and has appointed Corporation Service Company, 2711 Centerville Rd., Suite 400, Wilmington, DE as its agent for service of process.

5. On information and belief, this Court has personal jurisdiction over Defendants because Defendants have committed, and continue to commit, acts of infringement in the state of Texas, have conducted business in the state of Texas, and/or have engaged in continuous and systematic activities in the state of Texas.

6. On information and belief, Defendants' instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in the Eastern District of Texas.

VENUE

7. Venue is proper in the Eastern District of Texas pursuant to 28 U.S.C. §§ 1391(c) and 1400(b) because Defendants are deemed to reside in this district. In addition, and in the alternative, Defendants have committed acts of infringement in this District.

COUNT I **(INFRINGEMENT OF UNITED STATES PATENT NO. 7,917,285)**

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10. Plaintiff is the owner by assignment of the '285 Patent with sole rights to enforce the '285 Patent and sue infringers.

11. A copy of the '285 Patent, titled "Device, System and Method for Remotely Entering, Storing and Sharing Addresses for a Positional Information Device," is attached hereto as Exhibit A.

12. The '285 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

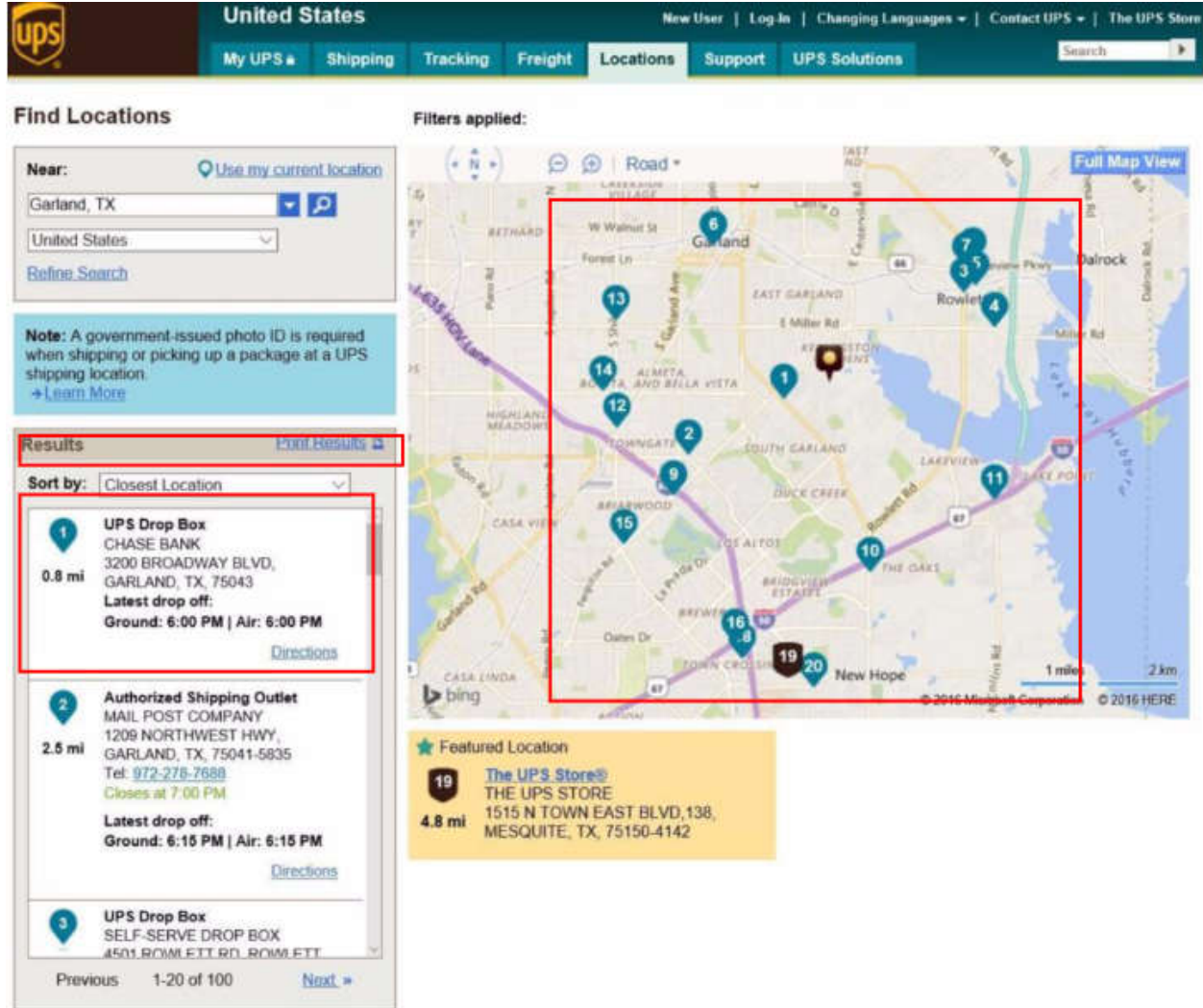
13. Upon information and belief, Defendants have infringed and continue to infringe one or more claims, including at least Claim 13, of the '285 patent by making, using (at least by having its employees, or someone under Defendant's control, test the System), importing, selling, and/or offering for sale a mobile website with associated hardware and software (the "System") covered by one or more claims of the '285 patent. Defendants have infringed and continues to infringe the '285 patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

14. The System includes the mobile website and associated hardware. These tools provide for remote entry of location information, such as store locations into a positional information device such as, for example, a tablet or smart phone. The website automatically loads nearby store locations onto the positional information device based on the user's location.

15. On information and belief, the System includes one or more servers that receive a request for an address of at least one location such as, for example, the location of a store nearby the user, which is not already stored in the positional information device.

16. On information and belief the server(s) determine the address of the store(s) and transmits the determined address(es) to the positional information device. For example, the server(s) transmits to the positional information device a visual indication of the store(s) on a

map. The following screenshot shows this functionality:

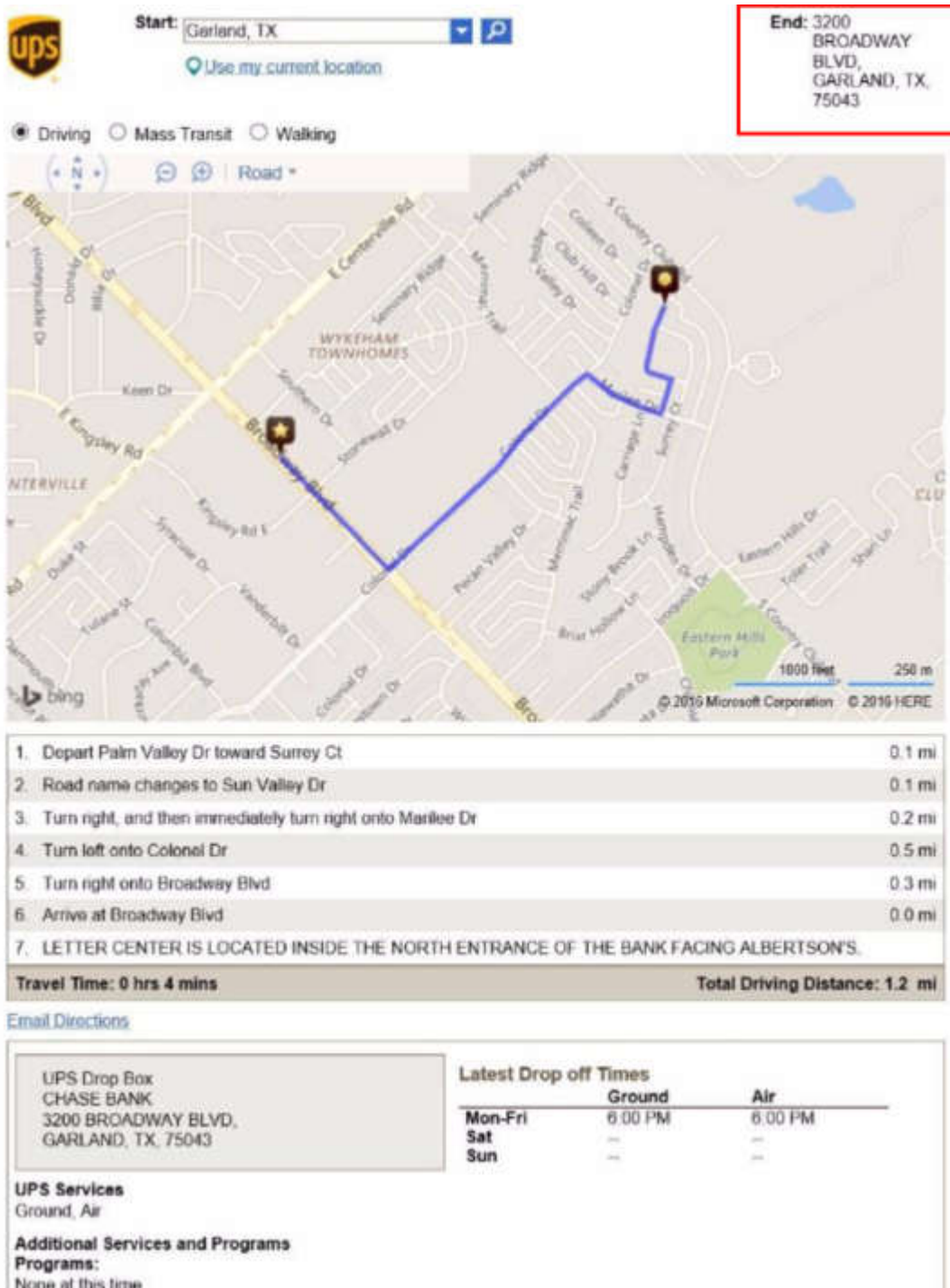


17. The positional information device includes a locational information module (e.g., GPS hardware), which Defendants use, and which determines the location of the positional information device.

18. The System includes a communications module (e.g., cellular or WiFi components in the positional information device), which Defendants use, and which receives the determined address(es) from the server(s).

19. The System includes a processing module (e.g., mapping software and the mobile website), which Defendants use, and which receives the determined address(es) from

the communication module. The processing module determines route guidance based on the location of the positional information device and the determined address(es). The screen shot below illustrates this feature:



20. The System includes a display module (e.g., screen on the positional

information device) for displaying the route guidance.

21. The System includes a communications network (e.g., cellular network) for coupling the positional information device to the server(s).

22. On information and belief, the server(s) receives a time and date (e.g., the time and date of the request for a location) associated with the requested location(s) and transmits the associated time and date with the determined address(es) to the positional information device and the positional information device displays the determined address at the associated time and date. For example, the time and date of the request must be sent to the server(s) so that the server(s) can determine traffic conditions associated with varying routes to the requested location and display location and route conditions corresponding to the time and date of the request. The screen shot below illustrates this feature:

Start: Garland, TX

End: 3200 BROADWAY BLVD, GARLAND, TX, 75043

Driving (selected), Mass Transit, Walking

1. Depart Palm Valley Dr toward Surrey Ct 0.1 mi
2. Road name changes to Sun Valley Dr 0.1 mi
3. Turn right, and then immediately turn right onto Marilee Dr 0.2 mi
4. Turn left onto Colonel Dr 0.5 mi
5. Turn right onto Broadway Blvd 0.3 mi
6. Arrive at Broadway Blvd 0.0 mi
7. LETTER CENTER IS LOCATED INSIDE THE NORTH ENTRANCE OF THE BANK FACING ALBERTSON'S.

Travel Time: 0 hrs 4 mins Total Driving Distance: 1.2 mi

UPS Drop Box
 CHASE BANK
 3200 BROADWAY BLVD,
 GARLAND, TX, 75043

Latest Drop off Times		
	Ground	Air
Mon-Fri	6:00 PM	6:00 PM
Sat	--	--
Sun	--	--

UPS Services
 Ground, Air

Additional Services and Programs
Programs:
 None at this time.

23. Defendants' actions complained of herein will continue unless Defendants are enjoined by this court.

24. Defendants' actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendants are

enjoined and restrained by this Court.

25. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendants, their agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendants who receive notice of the order from further infringement of United States Patent No. 7,917,285 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendants' infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: November 30, 2016

Respectfully submitted,

/s/ Jay Johnson

JAY JOHNSON

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ATTORNEYS FOR PLAINTIFF

EXHIBIT A