

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TRAXCELL TECHNOLOGIES, LLC.,)	
Plaintiff,)	
)	Civil Action No. 2:17-CV-00043
v.)	
)	
MOTOROLA SOLUTIONS, INC.,)	
Defendant.)	JURY TRIAL DEMANDED

PLAINTIFF’S SECOND AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Traxcell Technologies, LLC. (“Traxcell”) files this Second Amended Complaint and demand for jury trial seeking relief from patent infringement by Motorola Solutions, Inc. (“Motorola Solutions”), GenCore Candeco, Ltd. (“Genesis”)¹ and Genesis’ general partner Burks GenCore Co., Inc. (“Burks”) pursuant to Rule 15 of the Federal Rules of Civil Procedure, alleging as follows:

I. THE PARTIES

1. Plaintiff Traxcell is a Texas Limited Liability Company, with its principal place of business located 1405 Municipal Ave., Suite 2305, Plano, TX 75074.

2. On information and belief, Motorola Solutions, Inc. is a corporation organized and existing under the laws of Delaware, with a principal place of business at 500 West Monroe Street, Chicago, IL 60661 and a registered agent for service of process at CT Corp System, 1999 Bryan Street, Suite 900, Dallas, TX 75201. On information and belief, Motorola Solutions sells and offers to sell products and services throughout Texas, including in this judicial district, and introduces products

¹ GenCore Candeco, Ltd. is doing business as Genesis.

and services that perform infringing processes into the stream of commerce knowing that they would be sold in Texas and this judicial district.

3. On information and belief, Genesis is a limited partnership organized and existing under the laws of the State of Texas, with a principal place of business at 5800 Eagles Nest Blvd., Tyler, Texas 75703 and a registered agent for service of process, Phil Burks, located at 5800 Eagles Nest Blvd., Tyler, Texas 75703. Genesis sells and offers to sell products and services throughout Texas, including in this judicial district, and introduces products and services that perform infringing processes into the stream of commerce knowing that they would be sold in Texas and this judicial district.

4. On information and belief, Burks is a corporation organized and existing under the laws of the State of Texas, with a principal place of business at 5800 Eagles Nest Blvd., Tyler, Texas 75703 and a registered agent for service of process, Phil Burks, located at 5800 Eagles Nest Blvd., Tyler, Texas 75703. Burks sells and offers to sell products and services throughout Texas, including in this judicial district, and introduces products and services that perform infringing processes into the stream of commerce knowing that they would be sold in Texas and this judicial district.

II. JURISDICTION AND VENUE

5. This is an action for patent infringement arising under the patent laws of the U.S., 35 U.S.C. §§ 1 et. seq. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendant Motorola Solutions because: Motorola Solutions is present within or has minimum contacts within the State of Texas and this judicial district; Defendant has purposefully availed itself of the privileges of conducting business in the

State of Texas and in this judicial district; Defendant regularly conducts business within the State of Texas and within this judicial district; and Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of Texas and in this judicial district.

7. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c) and 1400(b). On information and belief, Motorola Solutions conducts substantial business in this forum, directly or through intermediaries, 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.

8. This Court has personal jurisdiction over Defendant Genesis, with Burks, because: Genesis and Burks are present within and has minimum contacts within the State of Texas and this judicial district; Defendants have purposefully availed themselves of the privileges of conducting business in the State of Texas and in this judicial district; Defendants regularly conduct business within the State of Texas and within this judicial district; and Plaintiff's cause of action arises directly from Defendants' business contacts and other activities in the State of Texas and in this judicial district.

9. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c) and 1400(b). On information and belief, Genesis, with Burks, conducts substantial business in this forum, directly or through intermediaries, 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.

III. INFRINGEMENT ('320 Patent (attached as Exhibit A))

10. On November 29, 2016, U.S. Patent No. 9,510,320 ("the '320 patent") entitled "Machine for Providing a Dynamic Database of Geographic Location Information for a Plurality of Wireless

Devices and Process for Making Same” was duly and legally issued by the U.S. Patent and Trademark Office. Traxcell owns the ’320 patent by assignment.

11. The ’320 Patent’s Abstract states, “For a wireless network, a tuning system in which mobile phones using the network are routinely located. With the location of the mobile phones identified, load adjustments for the system are easily accomplished so that the wireless network is not subject to an overload situation. Ideally the location of the mobile phones is accomplished whether the mobile phones are transmitting voice data or not.”

A. Motorola Solutions

12. Motorola Solutions makes, uses, offers to sell, or sells within or imports into the U.S. wireless networks, wireless-network components, and related services that use identified locations of wireless devices to perform adjustments such that Motorola Solutions infringes claims 1–6 of the ’320 patent, literally or under the doctrine of equivalents. Examples of products and systems accused of infringing include the

13. Plaintiff alleges that Control systems such as GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME – MOBILITY MANAGEMENT ENTITY; SPM – SUBSCRIBER AND POLICY MANAGER; CPG – CONVERGED PACKET GATEWAY; OSS-RC – OPERATIONS SUPPORT SYSTEM- RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked

Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or

with

a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS); XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO; LEX L10 MISSION CRITICAL LTE HANDHELD; VML750 LTE VEHICLE MODEM; CRYPTR 2 BROADBAND IP ENCRYPTION UNIT; CRYPTR MICRO ENCRYPTION UNIT; APX™ series of two-way radios; APCO Project 25 (P25) digital two-way radios; DIGITAL VEHICULAR REPEATER SYSTEM (DVRS); CM SERIES MOBILE TWO-WAY RADIO; XPR 2500 MOBILE TWO-WAY RADIO; K-TERM44; radios DP440x, DP460x and DP480x DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter; Motorola radio channel partners; Series HAE transmitters

and

a second computer coupled to the first computer with an access flag such as with voice-over-LTE or product such as MOBILE VPN; WAVE MOBILE COMMUNICATOR PTT; SCOUT; SMARTPTT PLUS; TRBONET PLUS; ALARM CONTROL SYSTEM; ALARM CONTROL SYSTEM (ACS); C-BRIDGE; C.O.D.I.C.E II; CENTRALIZED LONE WORKER; CMO; CONSEL; CUPOL; CVT-TRBO-PP; DMRALERT Products; EVENTIDE NEXLOG VOICE; RECORDER FOR MOTOTRBO; EZTRACKER@TRBO; FIRSTPAGE FAMILY; GPS TRACKING & ASSET MANAGEMENT SOLUTIONS; HERMESTRX Products; HERNING

SAFETY LOC; HERNING SAFETY M.D.; IFMI1; RTLS Indoor & Outdoor Positioning System; ZONITH Indoor Positioning System (IPS); IS-DATAYA; IS-VISOR-PLUS; ITALKIE SOLUTION; IO box K-TERM82; KAIROS Gateway KA-TI-02; KOLIBRI; KOLIBRI LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW); Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE; MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX; PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY; STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET and related servers, computers, storage devices, and wireless-network components. Defendant put the inventions claimed by the '320 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant obtaining monetary and commercial benefit from it.

14. Motorola Solutions has and continues to induce infringement. Motorola Solutions has actively encouraged or instructed others (e.g., its customers), and continues to do so, on how to use its products and services (e.g., U.S. wireless networks, wireless-network components [e.g., GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-

XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME – MOBILITY MANAGEMENT ENTITY; SPM – SUBSCRIBER AND POLICY MANAGER; CPG – CONVERGED PACKET GATEWAY; OSS-RC – OPERATIONS SUPPORT SYSTEM-RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or

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a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS); XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO; LEX L10 MISSION CRITICAL LTE HANDHELD; VML750 LTE VEHICLE MODEM; CRYPTR 2 BROADBAND IP ENCRYPTION UNIT; CRYPTR MICRO ENCRYPTION UNIT; APX™ series of two-way radios; APCO Project 25 (P25) digital two-way radios; DIGITAL VEHICULAR REPEATER SYSTEM (DVRS); CM SERIES MOBILE TWO-WAY RADIO; XPR 2500 MOBILE TWO-WAY RADIO; K-TERM44; radios DP440x, DP460x and DP480x DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with

a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter; Motorola radio channel partners; Series HAE transmitters

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services that use identified locations of wireless devices to perform adjustments such to cause infringement claims 1–6 of the '320 patent, literally or under the doctrine of equivalents.

15. Moreover, Motorola Solutions has known of the '320 patent, by at least by the date Motorola Solutions is served with this Complaint such that it knew and should have known that it was and would be inducing infringement; it has induced infringement post-suit filing. Further, Motorola has known of the Traxcell patents from November 15, 2007 when Traxcell was appointed as a supplier. Further, the Traxcell published patent application has been cited against Motorola patents over five times, including at least on February 21, 2008 when Motorola cited the Reed application as relevant art to its 11/359069.

16. At least the Motorola P25 & ASTRO 25; GW3-TRBO; Dimetra (TETRA) network; Motorola Public Safety LTE (PS-LTE) system administrators; Motorola SMARTZONE and SMARTNET systems; 3600 Network; GENWATCH3 ; TIA; GENWATCH3; MANAGER OF MANAGERS; GADI — Genesis-Aided Dispatch Interface; GEnSAC3; Genesis Trio; Genesis Field Investigation Tool; GenWatch3-DATA; Motorola Unified Event Manager; Outdoor Locator Solution; Motorola Universal Processing Server (MUPS); Provisioning Manager Interface; Advanced Power Monitor; SAM — Subscriber Access Manager; GenIIB — Genesis Interoperability Information Broker; GenSPOut (Genesis Specified Packet Output); ATIA REPLAY; Genesis ATIA Forwarder; and, SkyViewII products, systems and components are manufactured, marketed and sold by Genesis, with Burks, exclusively for Motorola Solutions.

17. Motorola Solutions has caused and will continue to cause Traxcell damage by infringing (including inducing infringement of) the '320 patent.

B. Genesis and Burks

18. Genesis, with Burks, makes, uses, offers to sell, or sells within or imports into the U.S. wireless networks, wireless-network components, and related services that use identified locations of wireless devices to perform adjustments such that Genesis, with Burks, infringes claims 1–6 of the '320 patent, literally or under the doctrine of equivalents. Upon information and belief, Genesis, with Burks, makes, uses, offers to sell, or sells within or imports into the U.S. wireless networks, wireless-network components, and related services that use identified locations of wireless devices to perform adjustments. Some examples of the wireless-network components include GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME - MOBILITY MANAGEMENT ENTITY; SPM - SUBSCRIBER AND POLICY MANAGER; CPG - CONVERGED PACKET GATEWAY; OSS-RC - OPERATIONS SUPPORT SYSTEM-RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or with a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS); XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO;

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PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY; STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET, and related servers, computers, storage devices; and wireless-network components. Defendant put the inventions claimed by the '320 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant obtaining monetary and commercial benefit from it.

19. Genesis, with Burks, has and continues to induce infringement. Genesis, with Burks, has actively encouraged or instructed others (e.g., its customers), and continues to do so, on how to use its products and services (e.g., GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME - MOBILITY MANAGEMENT ENTITY; SPM - SUBSCRIBER AND POLICY MANAGER; CPG - CONVERGED PACKET GATEWAY; OSS-RC - OPERATIONS SUPPORT SYSTEM-RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus;

MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or

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a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS); XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO; LEX L10 MISSION CRITICAL LTE HANDHELD; VML750 LTE VEHICLE MODEM; CRYPTR 2 BROADBAND IP ENCRYPTION UNIT; CRYPTR MICRO ENCRYPTION UNIT; APX™ series of two-way radios; APCO Project 25 (P25) digital two-way radios; DIGITAL VEHICULAR REPEATER SYSTEM (DVRS); CM SERIES MOBILE TWO-WAY RADIO; XPR 2500 MOBILE TWO-WAY RADIO; K-TERM44; radios DP440x, DP460x and DP480x DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter; Motorola radio channel partners; Series HAE transmitters

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TRACKING & ASSET MANAGEMENT SOLUTIONS; HERMESTRX Products; HERNING SAFETY LOC; HERNING SAFETY M.D.; IFMI1; RTLS Indoor & Outdoor Positioning System; ZONITH Indoor Positioning System (IPS); IS-DATAYA; IS-VISOR-PLUS; ITALKIE SOLUTION; IO box K-TERM82; KAIROS Gateway KA-TI-02; KOLIBRI; KOLIBRI LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW); Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE; MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX; PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY; STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET; and related servers, computers, storage devices, and wireless-network components.], and related services that use identified locations of wireless devices to perform adjustments such to cause infringement claims 1–6 of the '320 patent, literally or under the doctrine of equivalents.

20. Moreover, Genesis, with Burks, has known of the '320 patent, by at least by the date that Motorola Solutions was served with the Original Complaint such that it knew and should have known that it was and would be inducing infringement; it has induced infringement post-suit filing. Further, upon information and belief Genesis, with Burks, has known of the Traxcell patents from the time Traxcell was appointed as a supplier. Further, the Traxcell published patent application

has been cited against Motorola patents over five times, including at least on February 21, 2008 when Motorola cited the Reed application as relevant art to its 11/359069.

21. Genesis, with Burks, has caused and will continue to cause Traxcell damage by infringing (including inducing infringement of) the '320 patent.

IV. INFRINGEMENT ('284 Patent (attached as Exhibit B))

22. On March 10, 2015, U.S. Patent No. 8,977,284 (“the '284 patent”) entitled “Machine for Providing a Dynamic Database of Geographic Location Information for a Plurality of Wireless Devices and Process for Making Same” was duly and legally issued by the U.S. Patent and Trademark Office. Traxcell owns the '284 patent by assignment.

23. The '284 Patent's Abstract states, “For a wireless network, a tuning system in which mobile phones using the network are routinely located. With the location of the mobile phones identified, load adjustments for the system are easily accomplished so that the wireless network is not subject to an overload situation. Ideally the location of the mobile phones is accomplished whether the mobile phones are transmitting voice data or not.”

A. Motorola Solutions

24. Motorola Solutions makes, uses, offers to sell, or sells within or imports into the U.S. wireless networks, wireless-network components, and related services that use identified locations of wireless devices to perform adjustments such that Motorola Solutions infringes one or more claims of the '284 patent, including—for example—Claims 1 - 12, literally or under the doctrine of equivalents, specifically claim 1 and 12. Examples of products and systems accused of infringing include the GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR

5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME - MOBILITY MANAGEMENT ENTITY; SPM - SUBSCRIBER AND POLICY MANAGER; CPG - CONVERGED PACKET GATEWAY; OSS-RC - OPERATIONS SUPPORT SYSTEM-RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or

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a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS); XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO; LEX L10 MISSION CRITICAL LTE HANDHELD; VML750 LTE VEHICLE MODEM; CRYPTR 2 BROADBAND IP ENCRYPTION UNIT; CRYPTR MICRO ENCRYPTION UNIT; APX™ series of two-way radios; APCO Project 25 (P25) digital two-way radios; DIGITAL VEHICULAR REPEATER SYSTEM (DVRS); CM SERIES MOBILE TWO-WAY RADIO; XPR 2500 MOBILE TWO-WAY RADIO; K-TERM44; radios DP440x, DP460x and DP480x DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter; Motorola radio channel partners; Series HAE transmitters

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a second computer coupled to the first computer with an access flag such as with voice-over-LTE or product such as MOBILE VPN; WAVE MOBILE COMMUNICATOR PTT; SCOUT; SMARTPTT PLUS; TRBONET PLUS; ALARM CONTROL SYSTEM; ALARM CONTROL SYSTEM (ACS); C-BRIDGE; C.O.D.I.C.E II; CENTRALIZED LONE WORKER; CMO; CONSEL; CUPOL; CVT-TRBO-PP; DMRALERT Products; EVENTIDE NEXLOG VOICE; RECORDER FOR MOTOTRBO; EZTRACKER@TRBO; FIRSTPAGE FAMILY; GPS TRACKING & ASSET MANAGEMENT SOLUTIONS; HERMESTRX Products; HERNING SAFETY LOC; HERNING SAFETY M.D.; IFMI1; RTLS Indoor & Outdoor Positioning System; ZONITH Indoor Positioning System (IPS); IS-DATAYA; IS-VISOR-PLUS; ITALKIE SOLUTION; IO box K-TERM82; KAIROS Gateway KA-TI-02; KOLIBRI; KOLIBRI LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW); Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE; MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX; PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY; STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET; and related servers, computers, storage devices, and wireless-network components. Defendant put the inventions claimed by the '320 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never

have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant obtaining monetary and commercial benefit from it.

25. Motorola Solutions has and continues to induce infringement. Motorola Solutions has actively encouraged or instructed others (e.g., its customers), and continues to do so, on how to use its products and services (e.g., U.S. wireless networks, wireless-network components [e.g., GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME - MOBILITY MANAGEMENT ENTITY; SPM - SUBSCRIBER AND POLICY MANAGER; CPG - CONVERGED PACKET GATEWAY; OSS-RC - OPERATIONS SUPPORT SYSTEM-RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or with

a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS); XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO; LEX L10 MISSION CRITICAL LTE HANDHELD; VML750 LTE VEHICLE MODEM;

CRYPTR 2 BROADBAND IP ENCRYPTION UNIT; CRYPTR MICRO ENCRYPTION UNIT; APX™ series of two-way radios; APCO Project 25 (P25) digital two-way radios; DIGITAL VEHICULAR REPEATER SYSTEM (DVRS); CM SERIES MOBILE TWO-WAY RADIO; XPR 2500 MOBILE TWO-WAY RADIO; K-TERM44; radios DP440x, DP460x and DP480x DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter; Motorola radio channel partners; Series HAE transmitters

and

a second computer coupled to the first computer with an access flag such as with voice-over-LTE or product such as MOBILE VPN; WAVE MOBILE COMMUNICATOR PTT; SCOUT; SMARTPTT PLUS; TRBONET PLUS; ALARM CONTROL SYSTEM; ALARM CONTROL SYSTEM (ACS); C-BRIDGE; C.O.D.I.CE II; CENTRALIZED LONE WORKER; CMO; CONSEL; CUPOL; CVT-TRBO-PP; DMRALERT Products; EVENTIDE NEXLOG VOICE; RECORDER FOR MOTOTRBO; EZTRACKER@TRBO; FIRSTPAGE FAMILY; GPS TRACKING & ASSET MANAGEMENT SOLUTIONS; HERMESTRX Products; HERNING SAFETY LOC; HERNING SAFETY M.D.; IFMI1; RTLS Indoor & Outdoor Positioning System; ZONITH Indoor Positioning System (IPS); IS-DATAYA; IS-VISOR-PLUS; ITALKIE SOLUTION; IO box K-TERM82; KAIROS Gateway KA-TI-02; KOLIBRI; KOLIBRI LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW); Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE; MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX; PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording

solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY; STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET; and related servers, computers, storage devices, and wireless-network components.], and related services that use identified locations of wireless devices to perform adjustments such to cause infringement one or more claims of the '284 patent, including—for example—Claims 1 - 12, literally or under the doctrine of equivalents, specifically claim 1 and 12. Moreover, Motorola Solutions has known and should have known of the '284 patent, by at least by the date of the patent's issuance, which followed the date that a family-related patent's underlying application was cited to Motorola Solutions by the U.S. Patent and Trademark Office during prosecution of one of Motorola Solution's patent applications, such that Motorola Solutions knew and should have known that it was and would be inducing infringement.

26. Further, Motorola has known of the Traxcell patents from November 15, 2007 when Traxcell was appointed as a supplier. Further, the Traxcell published patent application has been cited against Motorola patents, including at least on February 21, 2008 when Motorola cited the Reed application as relevant art to its 11/359069.

27. Motorola Solutions has caused and will continue to cause Traxcell damage by infringing (including inducing infringement of) the '284 patent.

B. Genesis and Burks

28. Genesis, with Burks, makes, uses, offers to sell, or sells within or imports into the U.S. wireless networks, wireless-network components, and related services that use identified locations

of wireless devices to perform adjustments such that Motorola Solutions infringes one or more claims of the '284 patent, including—for example—Claims 1 - 12, literally or under the doctrine of equivalents, specifically claim 1 and 12. Some examples of the wireless-network components include GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME - MOBILITY MANAGEMENT ENTITY; SPM - SUBSCRIBER AND POLICY MANAGER; CPG - CONVERGED PACKET GATEWAY; OSS-RC - OPERATIONS SUPPORT SYSTEM-RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or with

a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS); XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO; LEX L10 MISSION CRITICAL LTE HANDHELD; VML750 LTE VEHICLE MODEM; CRYPTR 2 BROADBAND IP ENCRYPTION UNIT; CRYPTR MICRO ENCRYPTION UNIT; APX™ series of two-way radios; APCO Project 25 (P25) digital two-way radios; DIGITAL VEHICULAR REPEATER SYSTEM (DVRs); CM SERIES MOBILE TWO-WAY RADIO;

XPR 2500 MOBILE TWO-WAY RADIO; K-TERM44; radios DP440x, DP460x and DP480x DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter; Motorola radio channel partners; Series HAE transmitters

and

a second computer coupled to the first computer with an access flag such as with voice-over-LTE or product such as MOBILE VPN; WAVE MOBILE COMMUNICATOR PTT; SCOUT; SMARTPTT PLUS; TRBONET PLUS; ALARM CONTROL SYSTEM; ALARM CONTROL SYSTEM (ACS); C-BRIDGE; C.O.D.I.CE II; CENTRALIZED LONE WORKER; CMO; CONSEL; CUPOL; CVT-TRBO-PP; DMRALERT Products; EVENTIDE NEXLOG VOICE; RECORDER FOR MOTOTRBO; EZTRACKER@TRBO; FIRSTPAGE FAMILY; GPS TRACKING & ASSET MANAGEMENT SOLUTIONS; HERMESTRX Products; HERNING SAFETY LOC; HERNING SAFETY M.D.; IFMI1; RTLS Indoor & Outdoor Positioning System; ZONITH Indoor Positioning System (IPS); IS-DATAYA; IS-VISOR-PLUS; ITALKIE SOLUTION; IO box K-TERM82; KAIROS Gateway KA-TI-02; KOLIBRI; KOLIBRI LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW); Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE; MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX; PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT

ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY; STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET, and related servers, computers, storage devices; and wireless-network components. Defendant put the inventions claimed by the '284 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant obtaining monetary and commercial benefit from it.

29. Genesis, with Burks, has and continues to induce infringement. Motorola Solutions has actively encouraged or instructed others (e.g., its customers), and continues to do so, on how to use its products and services (e.g., GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME - MOBILITY MANAGEMENT ENTITY; SPM - SUBSCRIBER AND POLICY MANAGER; CPG - CONVERGED PACKET GATEWAY; OSS-RC - OPERATIONS SUPPORT SYSTEM-RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or

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a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS); XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO; LEX L10 MISSION CRITICAL LTE HANDHELD; VML750 LTE VEHICLE MODEM; CRYPTR 2 BROADBAND IP ENCRYPTION UNIT; CRYPTR MICRO ENCRYPTION UNIT; APX™ series of two-way radios; APCO Project 25 (P25) digital two-way radios; DIGITAL VEHICULAR REPEATER SYSTEM (DVRS); CM SERIES MOBILE TWO-WAY RADIO; XPR 2500 MOBILE TWO-WAY RADIO; K-TERM44; radios DP440x, DP460x and DP480x DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter; Motorola radio channel partners; Series HAE transmitters

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LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW); Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE; MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX; PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY; STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET; and related servers, computers, storage devices, and wireless-network components.], and related services that use identified locations of wireless devices to perform adjustments such to cause infringement of claims 1–12 of the '284 patent, literally or under the doctrine of equivalents, specifically claim 1 and 12.

30. Moreover, Genesis, with Burks, has known of the '284 patent, by at least by the date that Motorola Solutions was served with the Original Complaint such that it knew and should have known that it was and would be inducing infringement; it has induced infringement post-suit filing. Further, Genesis, with Burks, has known of the Traxcell patents from November 15, 2007 when Traxcell was appointed as a supplier. Further, the Traxcell published patent application has been cited against Motorola patents over five times, including at least on February 21, 2008 when Motorola cited the Reed application as relevant art to its 11/359069.

31. Genesis, with Burks, has caused and will continue to cause Traxcell damage by infringing (including inducing infringement of) the '284 patent.

V. INFRINGEMENT ('024 Patent (attached as Exhibit C))

32. On May 2, 2017, U.S. Patent No. 9,642,024 (“the ’024 patent”) entitled “Machine for Providing a Dynamic Database of Geographic Location Information for a Plurality of Wireless Devices and Process for Making Same” was duly and legally issued by the U.S. Patent and Trademark Office. Traxcell owns the ’024 patent by assignment.

33. The ’024 Patent’s Abstract states, “For a wireless network, a tuning system in which mobile phones using the network are routinely located. With the location of the mobile phones identified, load adjustments for the system are easily accomplished so that the wireless network is not subject to an overload situation. Ideally the location of the mobile phones is accomplished whether the mobile phones are transmitting voice data or not.”

A. Motorola Solutions

34. Motorola Solutions makes, uses, offers to sell, or sells within or imports into the U.S. wireless networks, wireless-network components, and related services that use identified locations of wireless devices to perform adjustments such that Motorola Solutions infringes one or more claims of the ’024 patent, including—for example—Claims 1, 6, 11, and 17, literally or under the doctrine of equivalents. Examples of products and systems accused of infringing include GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME – MOBILITY MANAGEMENT ENTITY; SPM – SUBSCRIBER AND POLICY MANAGER; CPG – CONVERGED PACKET GATEWAY; OSS-RC – OPERATIONS SUPPORT SYSTEM-

RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or

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RECORDER FOR MOTOTRBO; EZTRACKER@TRBO; FIRSTPAGE FAMILY; GPS TRACKING & ASSET MANAGEMENT SOLUTIONS; HERMESTRX Products; HERNING SAFETY LOC; HERNING SAFETY M.D.; IFMI1; RTLS Indoor & Outdoor Positioning System; ZONITH Indoor Positioning System (IPS); IS-DATAYA; IS-VISOR-PLUS; ITALKIE SOLUTION; IO box K-TERM82; KAIROS Gateway KA-TI-02; KOLIBRI; KOLIBRI LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW); Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE; MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX; PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY; STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET; and related servers, computers, storage devices, and wireless-network components. Defendant put the inventions claimed by the '024 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant obtaining monetary and commercial benefit from it.

35. Motorola Solutions has and continues to induce infringement. Motorola Solutions has actively encouraged or instructed others (e.g., its customers), and continues to do so, on how to

use its products and services (e.g., U.S. wireless networks, wireless-network components [e.g., GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME - MOBILITY MANAGEMENT ENTITY; SPM - SUBSCRIBER AND POLICY MANAGER; CPG - CONVERGED PACKET GATEWAY; OSS-RC - OPERATIONS SUPPORT SYSTEM-RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or

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DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter; Motorola radio channel partners; Series HAE transmitters

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a second computer coupled to the first computer with an access flag such as with voice-over-LTE or product such as MOBILE VPN; WAVE MOBILE COMMUNICATOR PTT; SCOUT; SMARTPTT PLUS; TRBONET PLUS; ALARM CONTROL SYSTEM; ALARM CONTROL SYSTEM (ACS); C-BRIDGE; C.O.D.I.CE II; CENTRALIZED LONE WORKER; CMO; CONSEL; CUPOL; CVT-TRBO-PP; DMRALERT Products; EVENTIDE NEXLOG VOICE; RECORDER FOR MOTOTRBO; EZTRACKER@TRBO; FIRSTPAGE FAMILY; GPS TRACKING & ASSET MANAGEMENT SOLUTIONS; HERMESTRX Products; HERNING SAFETY LOC; HERNING SAFETY M.D.; IFMI1; RTLS Indoor & Outdoor Positioning System; ZONITH Indoor Positioning System (IPS); IS-DATAYA; IS-VISOR-PLUS; ITALKIE SOLUTION; IO box K-TERM82; KAIROS Gateway KA-TI-02; KOLIBRI; KOLIBRI LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW); Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE; MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX; PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY;

STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET; and related servers, computers, storage devices, and wireless-network components.], and related services that use identified locations of wireless devices to perform adjustments such to cause infringement one or more claims of the '024 patent, including—for example—Claims 1, 6, 11 and 17, literally or under the doctrine of equivalents.

36. Moreover, Motorola Solutions has known and should have known of the '024 patent, by at least by the date of the patent's issuance, which followed the date that a family-related patent's underlying application was cited to Motorola Solutions by the U.S. Patent and Trademark Office during prosecution of one of Motorola Solutions' patent applications, such that Motorola Solutions knew and should have known that it was and would be inducing infringement. Further, Motorola has known of the Traxcell patents from November 15, 2007 when Traxcell was appointed as a supplier. Further, the Traxcell published patent application has been cited against Motorola patents over five times, including at least on February 21, 2008 when Motorola cited the Reed application as relevant art to its 11/359069.

37. Motorola Solutions has caused and will continue to cause Traxcell damage by infringing (including inducing infringement of) the '024 patent.

C. Genesis and Burks

38. Genesis, with Burks, makes, uses, offers to sell, or sells within or imports into the U.S. wireless networks, wireless-network components, and related services that use identified locations of wireless devices to perform adjustments such that Motorola Solutions infringes one or more claims of the '024 patent, including—for example—Claims 1, 6, 11 and 17, literally or under the doctrine of equivalents. Some examples of the wireless-network components include GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX;

SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME – MOBILITY MANAGEMENT ENTITY; SPM – SUBSCRIBER AND POLICY MANAGER; CPG – CONVERGED PACKET GATEWAY; OSS-RC – OPERATIONS SUPPORT SYSTEM- RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or

with

a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS); XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO; LEX L10 MISSION CRITICAL LTE HANDHELD; VML750 LTE VEHICLE MODEM; CRYPTR 2 BROADBAND IP ENCRYPTION UNIT; CRYPTR MICRO ENCRYPTION UNIT; APX™ series of two-way radios; APCO Project 25 (P25) digital two-way radios; DIGITAL VEHICULAR REPEATER SYSTEM (DVRS); CM SERIES MOBILE TWO-WAY RADIO; XPR 2500 MOBILE TWO-WAY RADIO; K-TERM44; radios DP440x, DP460x and DP480x DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with

a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter;
Motorola radio channel partners; Series HAE transmitters

and

a second computer coupled to the first computer with an access flag such as with voice-over-LTE
or product such as MOBILE VPN; WAVE MOBILE COMMUNICATOR PTT; SCOUT;
SMARTPTT PLUS; TRBONET PLUS; ALARM CONTROL SYSTEM; ALARM CONTROL
SYSTEM (ACS); C-BRIDGE; C.O.D.I.CE II; CENTRALIZED LONE WORKER; CMO;
CONSEL; CUPOL; CVT-TRBO-PP; DMRALERT Products; EVENTIDE NEXLOG VOICE;
RECORDER FOR MOTOTRBO; EZTRACKER@TRBO; FIRSTPAGE FAMILY; GPS
TRACKING & ASSET MANAGEMENT SOLUTIONS; HERMESTRX Products; HERNING
SAFETY LOC; HERNING SAFETY M.D.; IFMI1; RTLS Indoor & Outdoor Positioning System;
ZONITH Indoor Positioning System (IPS); IS-DATAYA; IS-VISOR-PLUS; ITALKIE
SOLUTION; IO box K-TERM82; KAIROS Gateway KA-TI-02; KOLIBRI; KOLIBRI
LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW);
Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE
ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE;
MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX;
PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording
solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS;
SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS);
SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT
ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY;
STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET,
and related servers, computers, storage devices; and wireless-network components. Defendant put

the inventions claimed by the '024 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant obtaining monetary and commercial benefit from it.

39. Genesis, with Burks, has and continues to induce infringement. Genesis, with Burks, has actively encouraged or instructed others (e.g., its customers), and continues to do so, on how to use its products and services (e.g., GW3-TRBO MANAGED SERVICES; ADEO-INTEROX; DAPAGE; EASY SIMULCAST KA-XXX; SMARTPTT INTEGRA; SMARTPTT MONITORING; TRBONET ENTERPRISE; TRBONET WATCH; XRC 9000 / XRC 9100 CONTROLLER; SLR 5000 SERIES REPEATER; MTR3000 BASE STATION/REPEATER; Model XPR REPEATER; XRT GATEWAY; SLR SERIES REPEATER; RBS LTE BASE STATION; HSS - HOME SUBSCRIBER SERVER; MME - MOBILITY MANAGEMENT ENTITY; SPM - SUBSCRIBER AND POLICY MANAGER; CPG - CONVERGED PACKET GATEWAY; OSS-RC - OPERATIONS SUPPORT SYSTEM-RADIO AND CORE; Motorola P25; LTE Priority Manager; MOTOTRBO Capacity Max; MOTOTRBO Connect Plus; MOTORBO GW3-TRBO; MOTOTRBO Capacity Plus; Linked Capacity Plus; IP Site Connect; MOTOTRBO Repeater Diagnostic and Control (RDAC); GTR 8000 BASE RADIO & EXPANDABLE SITE SUBSYSTEM; and/or the like, directly or contributorily infringe when used alone or

with

a WCD or handset such as UM1000 LTE USB MODEM; PREMIER MOBILE DATA COMPUTER (MDC); TRBONET SOFTWARE FOR GENERIC OPTION BOARDS (GOBS);

XPR SERIES PORTABLE TWO-WAY RADIO; SL SERIES PORTABLE TWO-WAY RADIO; LEX L10 MISSION CRITICAL LTE HANDHELD; VML750 LTE VEHICLE MODEM; CRYPTR 2 BROADBAND IP ENCRYPTION UNIT; CRYPTR MICRO ENCRYPTION UNIT; APX™ series of two-way radios; APCO Project 25 (P25) digital two-way radios; DIGITAL VEHICULAR REPEATER SYSTEM (DVRS); CM SERIES MOBILE TWO-WAY RADIO; XPR 2500 MOBILE TWO-WAY RADIO; K-TERM44; radios DP440x, DP460x and DP480x DM440x, DM460x, DM480x; K-TERM42 radios DP340x, DP360x, DM340x and DM360x; FS-3000 / FS-4000; B-AQUASAFE; DMP Series; and/or the like when used alone or when using with a transceiver with an antennae, such as with one or more of the K-TERM 70 beacon transmitter; Motorola radio channel partners; Series HAE transmitters

and

a second computer coupled to the first computer with an access flag such as with voice-over-LTE or product such as MOBILE VPN; WAVE MOBILE COMMUNICATOR PTT; SCOUT; SMARTPTT PLUS; TRBONET PLUS; ALARM CONTROL SYSTEM; ALARM CONTROL SYSTEM (ACS); C-BRIDGE; C.O.D.I.CE II; CENTRALIZED LONE WORKER; CMO; CONSEL; CUPOL; CVT-TRBO-PP; DMRALERT Products; EVENTIDE NEXLOG VOICE; RECORDER FOR MOTOTRBO; EZTRACKER@TRBO; FIRSTPAGE FAMILY; GPS TRACKING & ASSET MANAGEMENT SOLUTIONS; HERMESTRX Products; HERNING SAFETY LOC; HERNING SAFETY M.D.; IFMI1; RTLS Indoor & Outdoor Positioning System; ZONITH Indoor Positioning System (IPS); IS-DATAYA; IS-VISOR-PLUS; ITALKIE SOLUTION; IO box K-TERM82; KAIROS Gateway KA-TI-02; KOLIBRI; KOLIBRI LOGGING SYSTEM; Kolibri Control Room Suite; Zonith's Centralised Lone Worker (CLW); Zonith Man Down Notifier (MDN); Teldio's Man Down Notifier (MDN); MIDIAN VOICE ENCRYPTION; MIMER SOFTRADIO (MOTOTRBO); MONIVOX DATA INTERFACE;

MVX400 - MVX702 ROIP GATEWAY; NEOCONNEX FLEET MANAGER; PHOENYX; PHONE@TRBO; RADIO TO RADIO RECORDING (R2R); Teldio's Radio to Radio recording solution (R2R); RADIOPRO; RBX TELEPHONE INTERCONNECT; RBX+ PLUS; SAFEDISPATCH (MOTOTRBO); REAL TIME LOCATION SYSTEM (RTLS); SAFEDISPATCH MOBILE; SHORTTRACK GT; SMARTPTT BASIC; SMARTPTT ENTERPRISE; SMARTPTT FILE TRANSFER; SMARTPTT MOBILE; SMC GATEWAY; STREETTREK LOCATION & MESSAGING SERVERS; TEXT@TRBOPLUS; TRBONET; and related servers, computers, storage devices, and wireless-network components.], and related services that use identified locations of wireless devices to perform adjustments such to cause infringement of one or more claims of the '024 patent, literally or under the doctrine of equivalents.

40. Moreover, Genesis has known of the '024 patent, by at least by the date that Motorola Solutions was served with the Original Complaint such that it knew and should have known that it was and would be inducing infringement; it has induced infringement post-suit filing. Further, Motorola has known of the Traxcell patents from November 15, 2007 when Traxcell was appointed as a supplier. Further, the Traxcell published patent application has been cited against Motorola patents over eight times, including at least on February 21, 2008 when Motorola cited the Reed application as relevant art to its 11/359069.

41. Genesis, with Burks, has caused and will continue to cause Traxcell damage by infringing (including inducing infringement of) the '024 patent.

PRAYER FOR RELIEF

WHEREFORE, Traxcell respectfully requests that this Court:

- i. enter judgment that Motorola Solutions, Inc., Genesis, and Burks have infringed the '284 patent, the '320 patent, and the '024 patent;

- ii. award Traxcell damages in an amount sufficient to compensate it for Motorola Solutions', Genesis, and Lenovo (United States) Inc. infringement of the '284 patent, the '320 patent, and the '024 patent, in an amount no less than a reasonable royalty, together with prejudgment and post-judgment interest and costs under 35 U.S.C. § 284;
- iii. award Traxcell an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;
- iv. declare this case to be "exceptional" under 35 U.S.C. § 285 and award Traxcell its attorneys' fees, expenses, and costs incurred in this action, all trebled; and,
- v. award Traxcell such other and further relief as this Court deems just and proper, including a royalty for continuing infringement past the date of judgement.

JURY DEMAND

Traxcell hereby requests a trial by jury on issues so triable by right.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record who have appeared in this case are being served today, May 2, 2017, with a copy of the foregoing via the Court's CM/ECF system.

/s/ William P. Ramey, III

William P. Ramey, III