IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LOCAL INTELLIGENCE, LLC,
 	
        Plaintiff,
 	
     v.
 	
LG ELECTRONICS U.S.A., INC., AND
LG ELECTRONICS, INC.
 	
        Defendants.
	CIVIL ACTION NO.
	_____
	
	JURY TRIAL DEMANDED

COMPLAINT

For its Complaint, Plaintiff Local Intelligence, LLC by and through its undersigned

counsel, alleges as follows:

THE PARTIES

1.   Local Intelligence, LLC ("Local Intelligence") is a Texas limited liability

company with a place of business located at 1400 Preston Road, Suite 400, Plano, Texas 75093.

2.   On information and belief, Defendant LG Electronics U.S.A., Inc. ("LG USA") is

a Delaware corporation with its principal place of business located at 1000 Sylvan Avenue,

Englewood Cliffs, NJ 07632. LG USA can be served through its registered agent United States

Corporation Company, at 251 Little Falls Drive, Wilmington, DE 19808.

3.   On information and belief, Defendant LG Electronics Inc. is a Korean corporation

with its principal place of business in Yeouido-dong, Seoul, Republic of Korea. ("LG Korea",

together with LG USA, "LG.")

JURISDICTION AND VENUE

4.   This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

5.   Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and

1338.

6.   This Court has general and specific personal jurisdiction over LG. LG has

sufficient contacts with this judicial district, including but not limited incorporation of LG USA

in this state.

7.   Venue is proper in this District under 28 U.S.C. § 1400(b). LG Korea is a foreign

corporation, while LG-USA is incorporated in this district. A substantial part of the infringement

alleged in this Complaint has occurred and is occurring in this district, including the marketing,

selling, and offering for sale of infringing products.

THE PATENTS-IN-SUIT

8.   There are two United States Patents at issue in this litigation. Each is entitled

"Apparatus and Method for Automatically Refreshing a Display of a Telephone." The first

patent at issue, United States Patent No. 8,903,067 (the "'067 patent") (a true and correct copy of

which is attached hereto as Exhibit A) is the parent of the second patent at issue, United States

Patent No. 9,219,982 (the "'982 patent"). The '067 patent received careful and exacting scrutiny

from the United States Patent and Trademark Office prior to its issuance, as documented in its

file history (a true and correct copy of which is attached hereto as Exhibit B).

9.   Claim 1 of the '067 patent discloses a telephone having

   a. a display panel; a datastore including at least one function,

   b. wherein the at least one function comprises information relating to a current

      location of a telephone and at least one other condition associated with a user of

      the telephone,

    c.   wherein the at least one function is associated with at least one communication service;

    d.   circuitry operable to connect the telephone to a location server to obtain a current location of the telephone; and

    e.   a function selector programmable to refresh a screen on the display panel of the telephone to include at least one communication service associated with the function, based at least in part on a current location of the telephone.

10.   The '982 patent was duly and lawfully issued by the U.S. Patent and Trademark Office on July 14, 2015.

11.   Claim 1 of the '982 patent discloses a claim for a telephone comprising:

    a.   a display panel, a processor, and a datastore comprising

    b.   at least one function comprising information relating to a current location of the telephone and a user of the telephone,

    c.   the telephone operable to connect to a communication network,

    d.   wherein the at least one function is associated with at least one communication service,

    e.   wherein the processor is operable to connect the telephone to a location server to obtain a current location of the telephone,

    f.   select a function from the datastore, and

    g.   refresh a screen on the display panel to include the at least one communication service associated with the selected function based at least in part on the current location of the telephone.

12.   The inventor of the inventions claimed in the '067 and '982 patents is Shin Cheung Simon Chiu.

13.   Local Intelligence is the assignee and owner of all right, title and interest in and to the '067 and '982 patents, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it, including but not limited to the right to sue for past, present, and future damages.

14.   The accused devices include at least LG phones issued since December 2, 2014 with the Android 4.4 operating system or greater. Representative Accused LG Smartphones include the G4, G5, G6, V10, V20 and V30.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 9,219,982

15.   Local Intelligence repeats and realleges the allegations of paragraphs 1 through 14 as if fully set forth herein.

16.   Without license or authorization and in violation of 35 U.S.C. § 271(a), LG has infringed at least claim 1 of the '982 patent by making, having made, using, importing, offering for sale, and/or selling infringing smartphones, including the Accused LG Smartphones, each of which uses a location server to obtain a current location of the telephone and then uses that location information to refresh the display on the telephone with certain information, as further explained below.

17.   The Accused LG Smartphones meet all the limitations of Claim 1 as they are

    a. telephones comprising

    b. a display panel, a processor, and a datastore comprising

    c. at least one function comprising information relating to a current location of the telephone and a user of the telephone,

    d. the telephone operable to connect to a communication network,

    e. wherein the at least one function is associated with at least one

       communication service,

    f. wherein the processor is operable to connect the telephone to a location server

       to obtain a current location of the telephone,

    g. select a function from the datastore, and

    h. refresh a screen on the display panel to include the at least one communication

       service associated with the selected function based at least in part on the

       current location of the telephone.

18.   By way of illustration and only as example, the G6 is a telephone comprising a display panel, a processor, and a datastore, as shown in Figure A.

Figure A (Source: http://www.lg.com/us/mobile-phones/g6#specs)

Summary

Display
- 5.7" QHD Plus
- FullVision Display
- 2880 x 1440

Processor
- Qualcomm® Snapdragon™
- 821 2.35 GHz + 1.6Hz
- Quad-Core

Camera

Battery
- 3,300 mAh
- Non-Removable

Operating System
- Android™ 7.0 Nougat

Memory
- ROM: 32 GB
- RAM: 4 GB
- microSD™ Support

19.   The LG G6's memory comprises at least one function comprising information relating to a current location of the telephone and a user of the telephone, as shown in Figures B, C, D and E.

Figure B (Source: https://www.tomsguide.com/us/set-up-android-pay-on-lg-g6,review-4294.html)
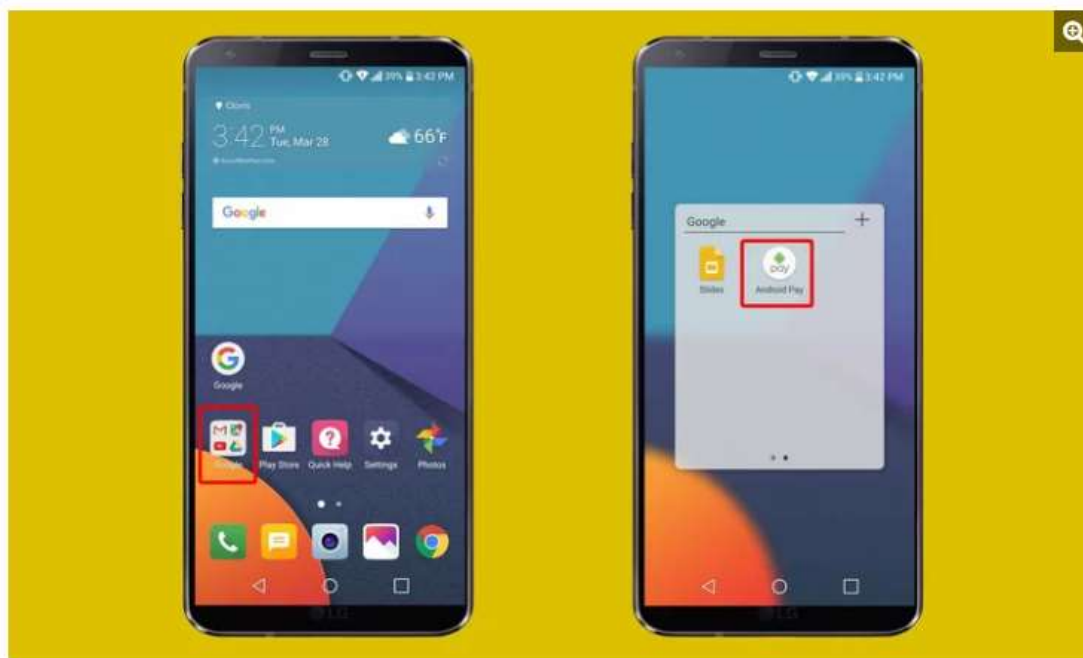
1. **Launch the Android Pay app.** It's grouped with the other stock Google apps in the folder labeled Google on your G6.

Figure C (Source: https://www.androidauthority.com/how-to-use-android-pay-678739/;
https://www.quicken.com/understanding-apple-pay-google-wallet-and-similar-apps)

How does Android Pay work?

On supported smartphones and smartwatches, Google's payment service uses near field communication (NFC) technology. A user stores their credit or debit card information on their Android Pay account, and when they want to pay for an item or service, they take their phone or watch and place it near the retailer's point-of-sale terminal. A signal send through NFC hardware send the payment information from the phone or watch to the POS terminal. Android Pay can also be used on some NFC-enabled ATMs so users can get cash money from their bank account, again without having to pull out their credit or debit card.

A Peek Behind the Technology

The reason you're able to use a smartphone or tablet to make purchases today is due to a technology called Near Field Communication (NFC). It's a small piece of hardware built into most Apple and Android touch devices released since 2015 that communicates with modern credit card machines using radio waves. The signals are encrypted so only your phone and the credit card machine can understand them, keeping your transactions safe and secure.

Figure D (Source: https://developers.google.com/save-to-android-pay/)

Gift cards

The Save to Android Pay API for Gift Cards lets Android Pay users view and use their gift cards on any Android device that has access to the cloud. Specifically, the API allows users to add your gift card to their digital wallet. They'll then get location-based notifications reminding them to use it when they're in your store. When they make a purchase, they can easily redeem the gift card by showing the bar code on their phone or automatically sending the info via NFC. They can also use the Android Pay app to track their gift card activity and balance.
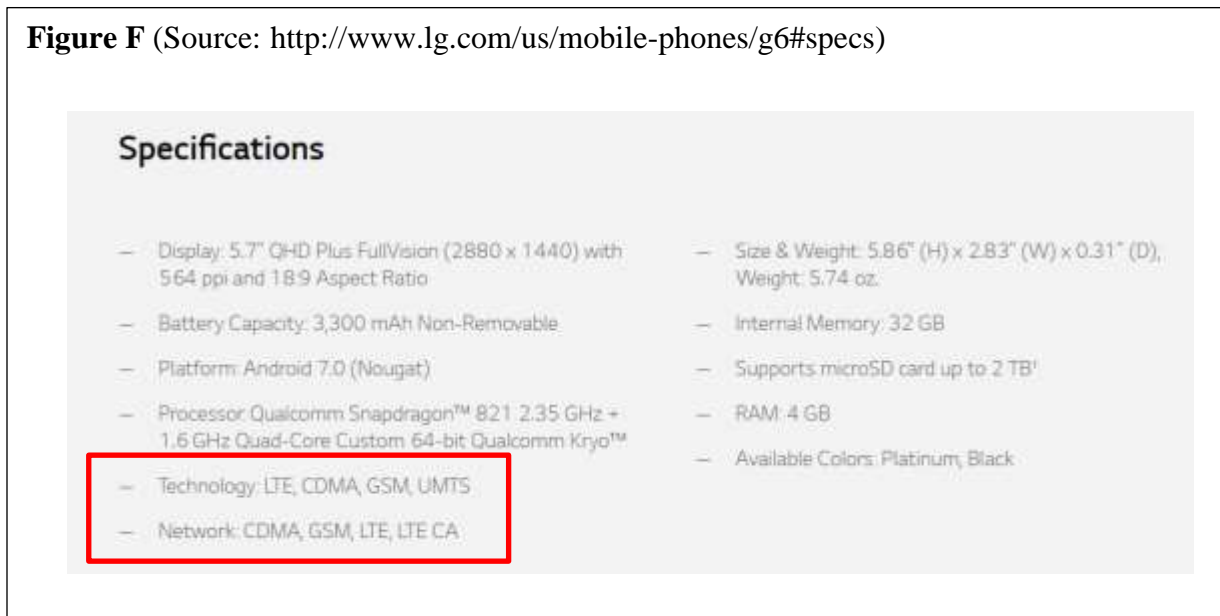
CREATE A GIFT CARD

Figure E (Source: https://www.androidcentral.com/enabling-android-pay-loyalty-location-notifications)
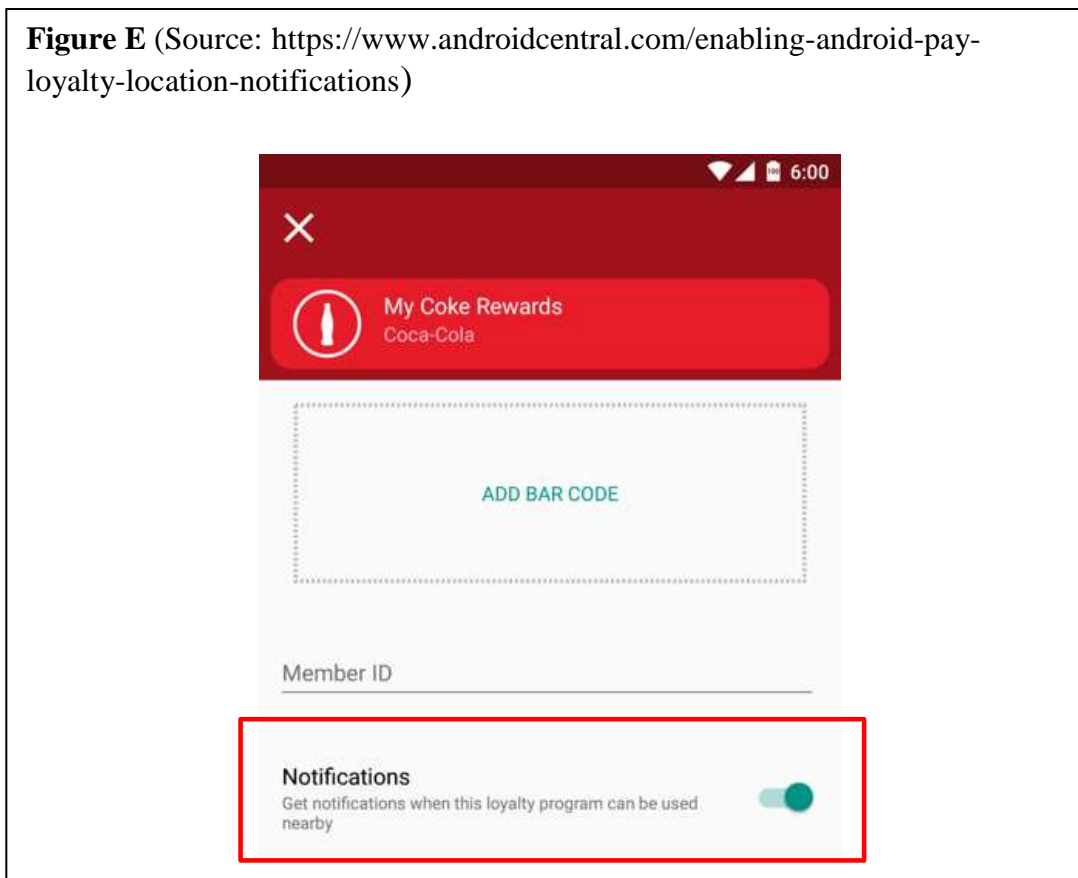
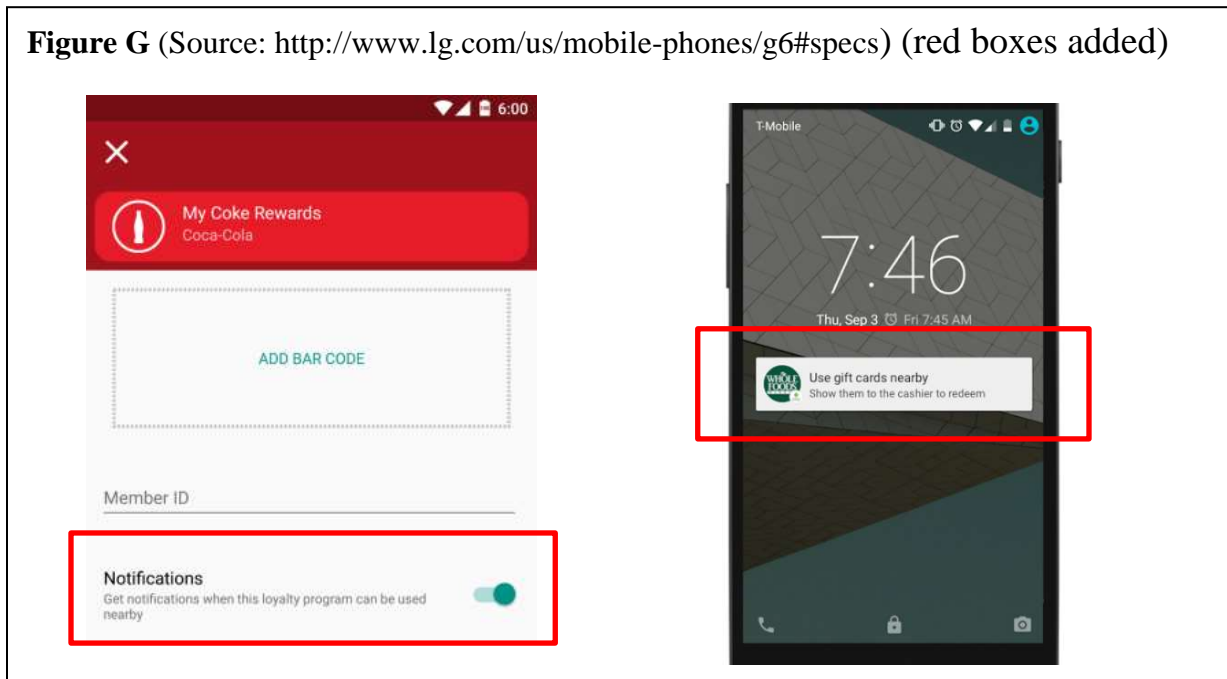20.   The G6 is operable to connect to a communications network, as shown in
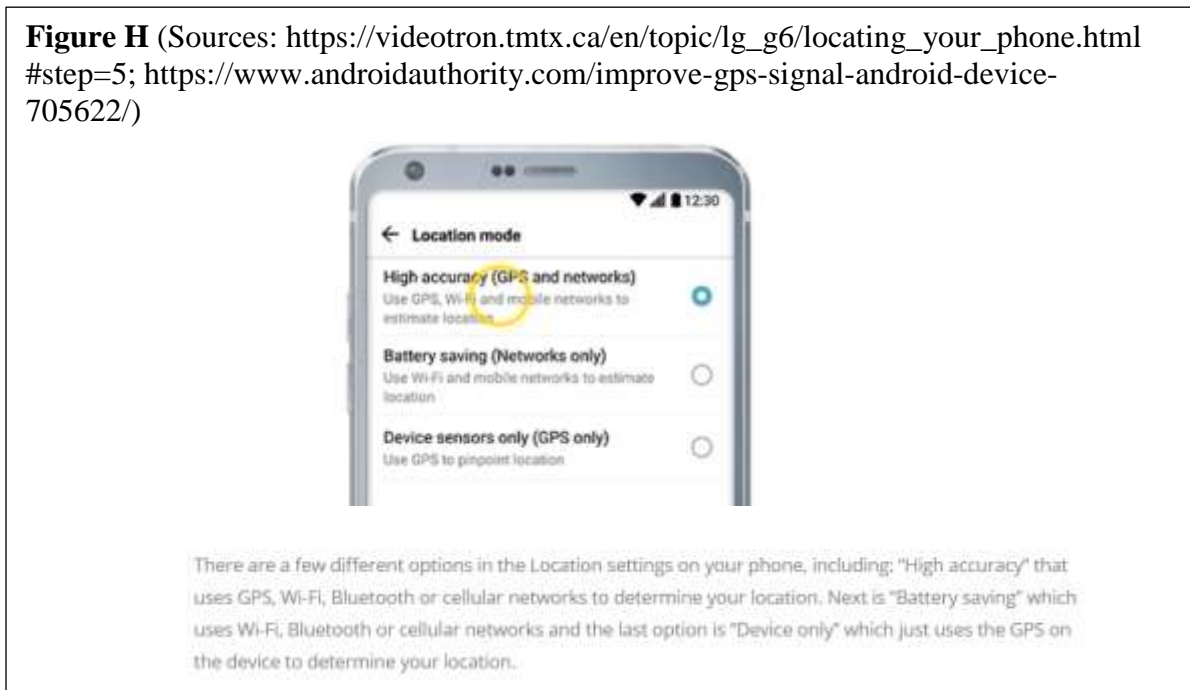
Figure F.

Figure F (Source: http://www.lg.com/us/mobile-phones/g6#specs)

21. The G6 features at least one function associated with at least one communication service, as shown in Figures G.

Figure G (Source: http://www.lg.com/us/mobile-phones/g6#specs) (red boxes added)
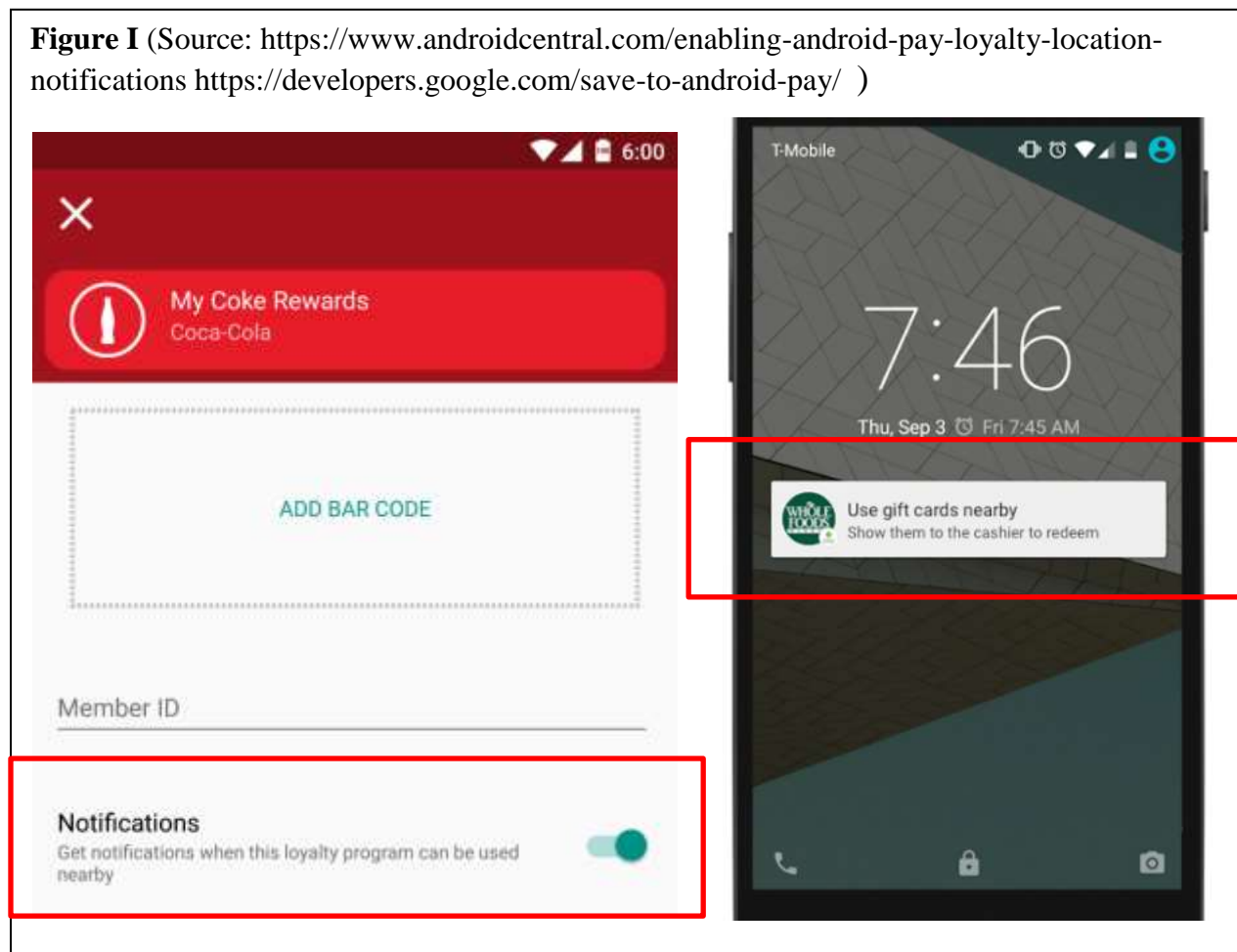

22.   The G6's processor is operable to connect the telephone to a location server to obtain a current location of the telephone, as shown in Figure H.

Figure H (Sources: https://videotron.tmtx.ca/en/topic/lg_g6/locating_your_phone.html #step=5; https://www.androidauthority.com/improve-gps-signal-android-device-705622/)

23.   The G6 is able to select a function from the datastore, and refresh a screen on the display panel to include the at least one communication service associated with the selected function based at least in part on the current location of the telephone, as shown in Figure I

Figure I (Source: https://www.androidcentral.com/enabling-android-pay-loyalty-location-notifications https://developers.google.com/save-to-android-pay/)

24.   Local Intelligence is entitled to recover from Defendants the damages sustained by Local Intelligence as a result of Defendants' infringement of the '982 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

25.   Upon information and belief, Defendants began selling infringing phones at least as early as December 2014, if not earlier.
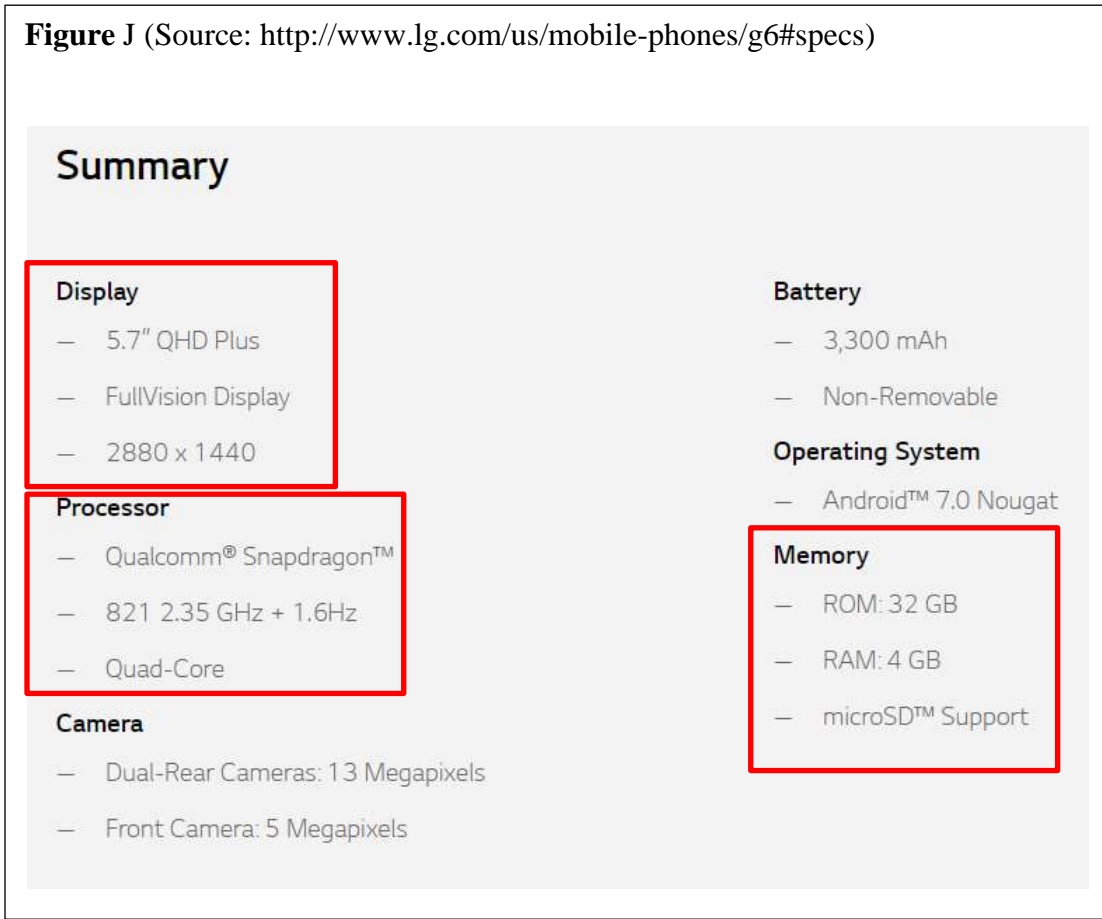
COUNT II – INFRINGEMENT OF U.S. PATENT NO. 8,903,067

26.   Local Intelligence repeats and realleges the allegations of paragraphs 1 through 25 as if fully set forth herein.

27.   Without license or authorization and in violation of 35 U.S.C. § 271(a), LG has infringed at least claim 1 of the '067 patent by making, having made, using, importing, offering for sale, and/or selling infringing smartphones, including the Accused LG Smartphones, each of which uses a location server to obtain a current location of the telephone and then uses that location information to refresh the display on the telephone with certain information, as further explained below.

28.   The Accused LG Smartphones meet all the limitations of Claim 1 as they are

a.   telephones comprising

b.   a display panel;

c.   a datastore including at least one function, wherein the at least one function comprises information relating to a current location of a telephone and at least one other condition associated with a user of the telephone,

d.   wherein the at least one function is associated with at least one communication service;

e.   circuitry operable to connect the telephone to a location server to obtain a current location of the telephone; and

f.   a function selector programmable to refresh a screen on the display panel of the telephone to include at least one communication service associated with the function, based at least in part on a current location of the telephone.

29.   By way of illustration and only as example, the G6 phones feature a datastore including at least one function, as show in Figure J following this paragraph.

Figure J (Source: http://www.lg.com/us/mobile-phones/g6#specs)

Summary

Display
— 5.7" QHD Plus
— FullVision Display
— 2880 x 1440

Processor
— Qualcomm® Snapdragon™
— 821 2.35 GHz + 1.6Hz
— Quad-Core

Camera
— Dual-Rear Cameras: 13 Megapixels
— Front Camera: 5 Megapixels

Battery
— 3,300 mAh
— Non-Removable

Operating System
— Android™ 7.0 Nougat

Memory
— ROM: 32 GB
— RAM: 4 GB
— microSD™ Support

30.   The G6's "at least one function" comprises information relating to a current location of a telephone and at least one other condition associated with a user of the telephone, as illustrated in Figures K, L, M and N.

Figure K (Source: https://www.tomsguide.com/us/set-up-android-pay-on-lg-g6,review-4294.html)

1. **Launch the Android Pay app.** It's grouped with the other stock Google apps in the folder labeled Google on your G6.

Figure L (Source: https://www.androidauthority.com/ho7w-to-use-android-pay-678739/; https://www.quicken.com/understanding-apple-pay-google-wallet-and-similar-apps)

How does Android Pay work?

On supported smartphones and smartwatches, Google's payment service uses near field communication (NFC) technology. A user stores their credit or debit card information on their Android Pay account, and when they want to pay for an item or service, they take their phone or watch and place it near the retailer's point-of-sale terminal. A signal send through NFC hardware send the payment information from the phone or watch to the POS terminal. Android Pay can also be used on some NFC-enabled ATMs so users can get cash money from their bank account, again without having to pull out their credit or debit card.
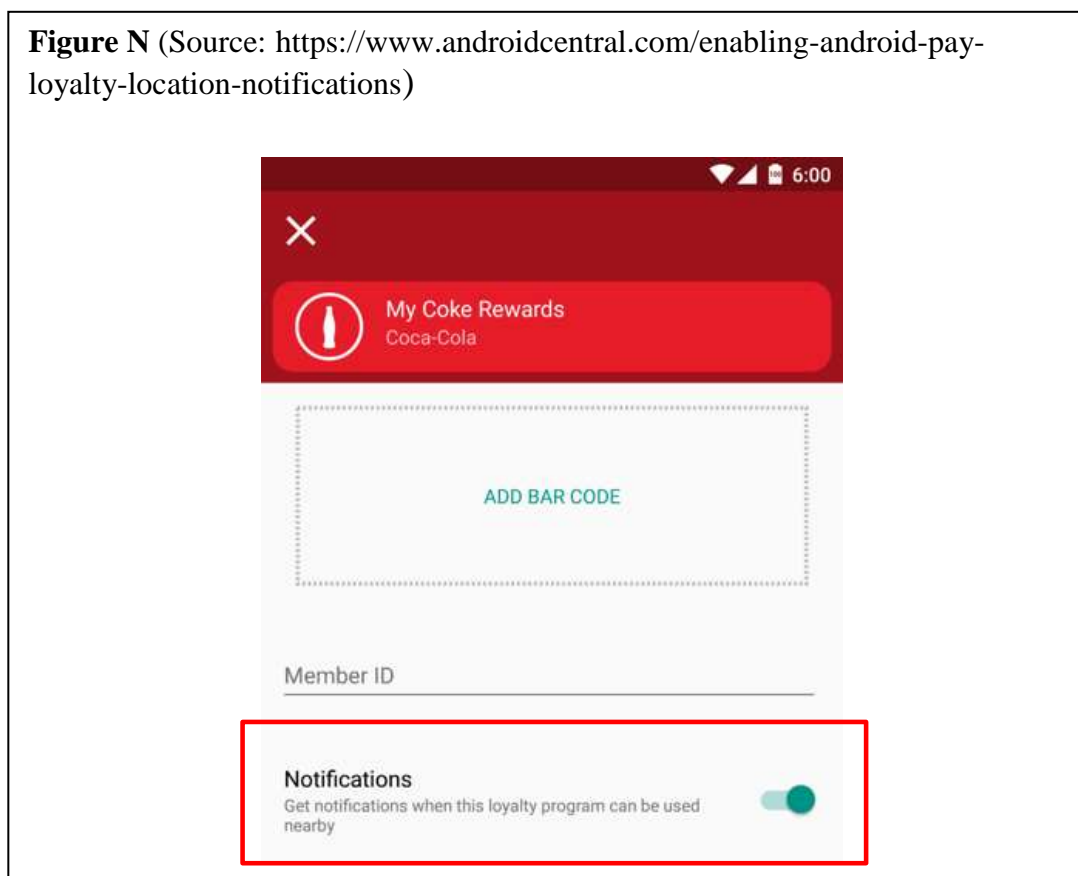
A Peek Behind the Technology

The reason you're able to use a smartphone or tablet to make purchases today is due to a technology called Near Field Communication (NFC). It's a small piece of hardware built into most Apple and Android touch devices released since 2015 that communicates with modern credit card machines using radio waves. The signals are encrypted so only your phone and the credit card machine can understand them, keeping your transactions safe and secure.
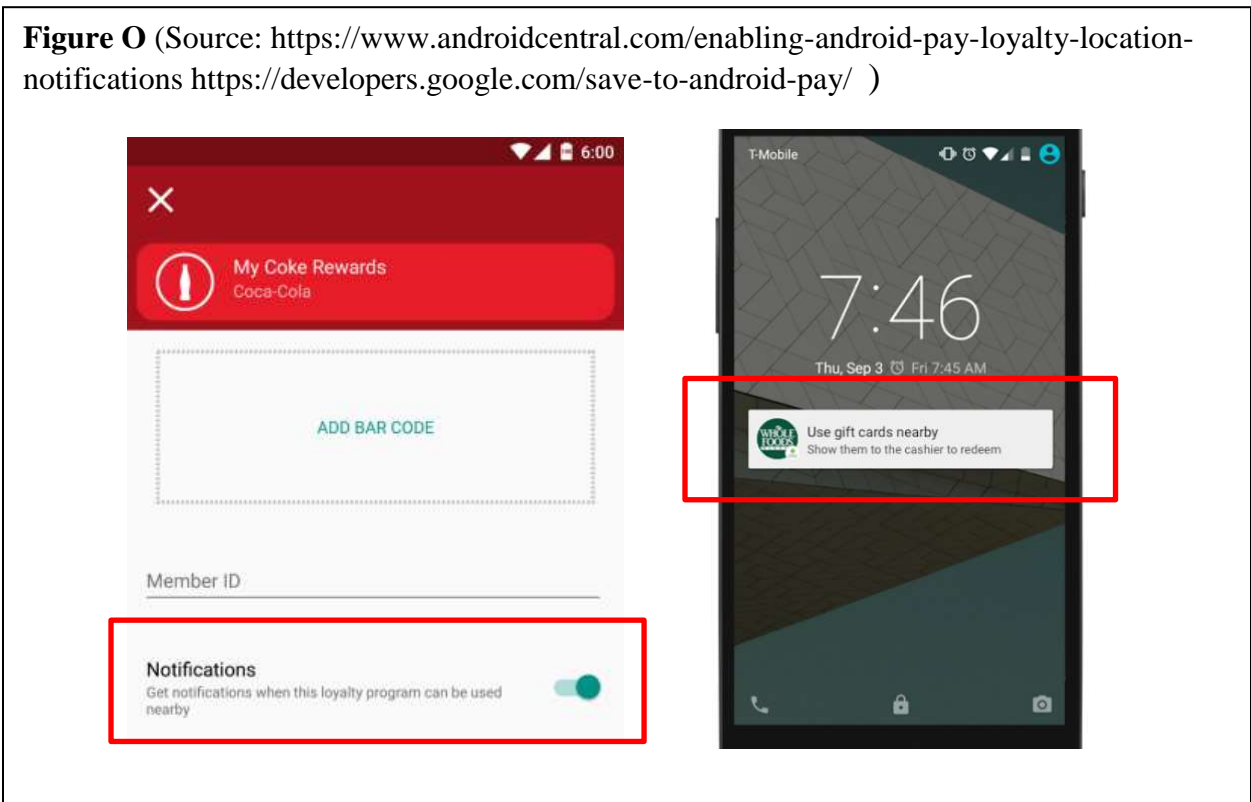
Figure M (Source: https://developers.google.com/save-to-android-pay/)

**Figure N** (Source: https://www.androidcentral.com/enabling-android-pay-loyalty-location-notifications)

14

31.   The G6 features at least one function is associated with a at least one

communication service, as shown in Figure O.

Figure O (Source: https://www.androidcentral.com/enabling-android-pay-loyalty-location-notifications https://developers.google.com/save-to-android-pay/)

32. The G6 has circuitry operable to connect the telephone to a location server to obtain a

current location of the telephone; as shown in Figure P immediately following.

Figure P (Sources: https://videotron.tmtx.ca/en/topic/lg_g6/locating_your_phone.html #step=5; https://www.androidauthority.com/improve-gps-signal-android-device-705622/)
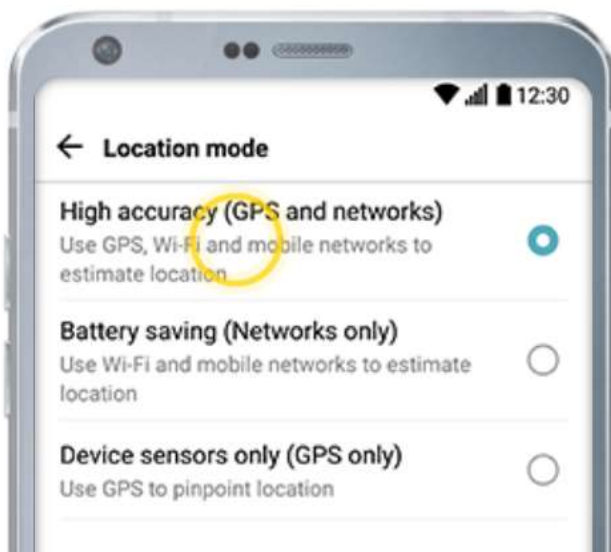
There are a few different options in the Location settings on your phone, including: "High accuracy" that uses GPS, Wi-Fi, Bluetooth or cellular networks to determine your location. Next is "Battery saving" which uses Wi-Fi, Bluetooth or cellular networks and the last option is "Device only" which just uses the GPS on the device to determine your location.

16

33.   The G6 has a function selector programmable to refresh a screen on the display panel of the telephone to include at least one communication service associated with the function, based at least in part on a current location of the telephone, as illustrated in Figure Q.

Figure Q (Source: https://developers.google.com/save-to-android-pay/)

34. Local Intelligence is entitled to recover from Defendants the damages sustained by Local Intelligence as a result of Defendants' infringement of the '067 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

35. Upon information and belief, Defendants began selling infringing phones in at least as early as December 2014, if not earlier.

JURY DEMAND

Local Intelligence hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Local Intelligence requests that this Court enter judgment against Defendants as follows:

A.   An adjudication that Defendants have infringed the '067 and '982;

B.   An award of damages to be paid by Defendants adequate to compensate Local Intelligence for Defendants' past infringement of the '067 and '982 patents through the earlier of the date of judgment or the expiration of the patents, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C.   An injunction precluding Defendants' further infringement of the '067 and '982;

D.   A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Local Intelligence's reasonable attorneys' fees; and

E.   An award to Local Intelligence of such further relief at law or in equity as the Court decides is just and proper.

Respectfully submitted, this 16th day of February 2018.

<div align="center">

STAMOULIS & WEINBLATT LLC

</div>

/s/ Stamatios Stamoulis
Stamatios Stamoulis #4606
  stamoulis@swdelaw.com
Richard C. Weinblatt #5080
  weinblatt@swdelaw.com
Two Fox Point Centre
6 Denny Road, Suite 307
Wilmington, DE 19809
Telephone: (302) 999-1540

Nicole D. Galli (*pro hac vice to be filed)*
Charles P. Goodwin (*pro hac vice to be filed*)
LAW OFFICES OF N.D. GALLI LLC
2 Penn Center Plaza, Suite 910
1500 JFK Blvd
Philadelphia, PA 19102
Telephone: (215) 525-9580
Facsimile: (215) 525-9585
ndgalli@ndgallilaw.com
cgoodwin@ndgallilaw.com

Attorneys for Plaintiff
Local Intelligence, LLC