IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WIRELESS MONITORING SYSTEMS LLC,	§ § §	
Plaintiff,	§ §	Case No:
vs.	§ § §	
DETECTOR ELECTRONICS CORPORATION,	§ § §	JURY TRIAL DEMANDED
Defendant.	§ § § §	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Wireless Monitoring Systems LLC ("Plaintiff" or "WMS"), by and through its attorneys, files this Complaint against Detector Electronics Corporation ("Defendant" or "DEC") for infringement of United States Patent No. 8,912,893 ("the '893 Patent").

PARTIES AND JURISDICTION

1.   This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2.   Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3.   Plaintiff is a Texas limited liability company with its office located at 101 E. Park Blvd., Suite 600, Plano, TX 75074.

4.   Upon information and belief, Defendant is a Delaware corporation with a place of business at 6901 West 110th Street, Minneapolis, MN 55438.   This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of

infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

5.   Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

6.   On information and belief, venue is proper in this District pursuant to 28 U.S.C. § 1400(b). Defendant is deemed to reside in this District.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 8,912,893)

7.   Plaintiff incorporates paragraphs 1 through 6 herein by reference.

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

9.   Plaintiff is the owner by assignment of the '893 Patent with sole rights to enforce the '893 Patent and sue infringers.

10.   A copy of the '893 Patent, titled "Circuit Monitoring Device," is attached hereto as Exhibit A.

11.   The '893 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

12.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 30, of the '893 Patent by making, using, importing, selling, and/or offering for sale, field devices, wireless systems, circuit monitoring devices, and/or components for such systems covered by one or more claims of the '893 Patent. Defendant causes infringement by its customers and users and encourages the use of accused devices through distribution, support and customer services. Defendant has infringed

and continues to infringe the '893 Patent directly in violation of 35 U.S.C. § 271.

13.   Defendant sells, offers to sell, and/or uses wireless security systems, including, without limitation, the X3301 Multispectrum Infrared Flame Detector, and any other WirelessHART-compliant devices (e.g., Model Nos. ATX10, Eclipse, GT3000, LS2000, OPECL, UD10, X2200,X3301, X3302, X5200, X9800) ("Product"), which infringe at least Claim 30 of the '893 Patent.

14.   The Product practices monitoring a circuit with a circuit monitoring device. As discussed above in connection with Count I, the WirelessHart standard enables devices to monitor circuits.

15.   The Product practices the step of receiving, using one or more processors configured by software within one or more modules, a parameter of a circuit. For example, WirelessHART targets sensors and actuators, rotating equipment, such as kiln dryers, and environmental health and safety applications, such as safety showers, condition monitoring and flexible manufacturing in which a portion of the plant can be reconfigured for specific products. See, e.g., A Comparison of WirelessHART™ and ISA100.11a (Exhibit B). The basic network device types include:

- field devices performing field sensing or actuating functions;

- routers – all devices must have the ability to route packets in the wireless mesh;

- adapters that bind wired HART devices into the wireless mesh;

- hand-held devices carried by mobile users such as plant engineers and service technicians;

- access points that connect wireless mesh to the gateway;

- a simplex or redundant gateway that functions as a bridge to the host applications;

- a single network manager (may be redundant) that may reside in the gateway device or be separate from the gateway;

- a security manager that may reside in the gateway device or separate from the gateway.

See Exhibit B.

16.   The Product practices the step of comparing, using the one or more configured processors, a digital value, which corresponds to a magnitude of the parameter of the circuit, to a plurality of threshold values wherein the plurality of threshold values define a respective plurality of ranges of digital values, each range corresponding to one of a plurality of conditions of the circuit including a normal condition and at least one alarm condition. For example, WirelessHART devices are designed to send status alerts when various measurements exceed digital values in memory based upon a comparison with measured values of an electrical parameter.   See, e.g., System Engineering Guidelines IEC 62591 WirelessHART® (Exhibit C). According to Section 7.3.1 (Configure process alerts), process alerts allow the transmitter to indicate when the configured data point is exceeded. Process alerts can be set for process variable and secondary variable. For example, for pressure transmitter, process alerts can be set for pressure, temperature, or both. The alert will reset once the value returns within range. The device alerts are displayed on the Field Communicator, on the Asset Management System Status screen, and/or in the error section of the LCD display of the instrument. The following alarms configuration can be used for a WirelessHART device:

- • HI HI Alarm

- • HI Alarm

• LO Alarm

• LO LO Alarm

Among other things, the alarm configurations indicate comparison of a digital value corresponding to a measured electrical parameter with a threshold value defining a range of digital values, as well as the assignment of a status based on the digital value being in a particular range.

17.   The Product practices assigning, using the one or more configured processors, a status according to the digital value being within a particular range defined by one or more of the plurality of threshold values.   See Exhibit C, as discussed, for example, above in connection with Paragraph 16.

18.   The Product practices transmitting, using a transmitter, the status to a central monitoring system. For example, WirelessHART devices communicate status to a remote computing system over a wireless network, including status. The radio spectrum used is the 2.4 GHz ISM (Instrumentation, Scientific and Medical) band and does not require licensing. The radio technology uses a combination of channel-hopping and direct-sequence, spread spectrum (DSSS) to achieve coexistence with other users of the same spectrum. Networks can occupy the same physical space and radio spectrum without blocking one another.   Certain aspects of this element are illustrated in the following screen shot(s) and/or in screen shots provided in connection with other allegations herein.
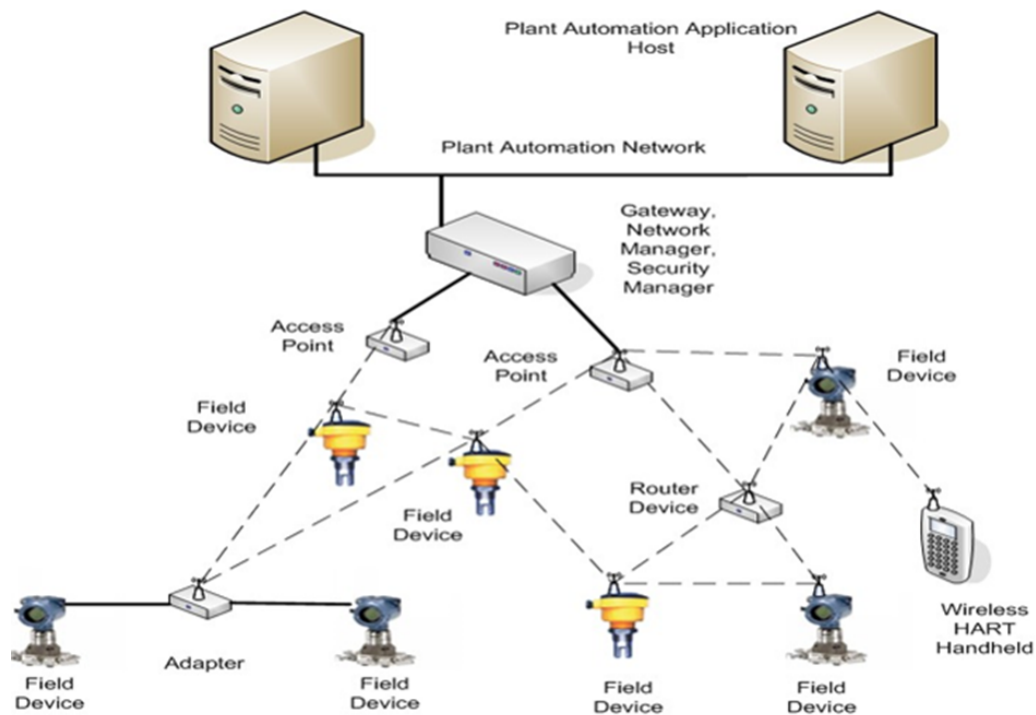
See Exhibits B and C.

19.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

20.   Defendant's 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.

21.   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)   Award Plaintiff past and future damages, costs, and expenses resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

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

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

Dated: April 20, 2018   Respectfully submitted,

/s/Stamatios Stamoulis
STAMATIOS STAMOULIS #4606
STAMOULIS & WEINBLATT LLC
Two Fox Point Centre
6 Denny Rd.
Suite 307
Wilmington, DE 19809
(302) 999-1540
stamoulis@swdelaw.com

ATTORNEY FOR PLAINTIFF