

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VALMONT INDUSTRIES, INC.,

Plaintiff,

v.

LINDSAY CORPORATION and
LINDSAY SALES & SERVICES, LLC,

Defendants.

C.A. No. 15-cv-42-LPS-CJB

JURY TRIAL DEMANDED

SECOND AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Valmont Industries, Inc. (“Valmont”), for its Second Amended Complaint against Lindsay Corporation and Lindsay Sales & Services, LLC (collectively, “Lindsay” or “Defendants”), alleges as follows:

The Nature of the Action

1. This is an action for infringement of United States Patent No. 7,003,357 C2 (“the ‘357 Patent”) under 35 U.S.C. § 271.

The Parties

2. Valmont is a Delaware corporation, with a principal place of business at One Valmont Plaza, Omaha, Nebraska 68154.

3. On information and belief, Lindsay Corporation is a Delaware corporation, with a principal place of business at 2222 North 111th Street, Omaha, Nebraska 68164. Service upon Lindsay Corporation may be made by serving its registered agent for service of process, The Corporation Trust Company, 1209 Orange Street, Wilmington, DE 19801. On information and belief, Lindsay Corporation is in the wholesale sales and distribution business, and derives revenue

from sales and distribution of the products at issue through its dealer, Sussex Irrigation Co., Inc., located at 11323 Trussum Pond Road, Laurel, Delaware 19956.

4. On information and belief, Lindsay Sales & Services, LLC is a Nebraska limited liability company with a principal place of business at 2222 North 111th Street, Omaha Nebraska 68164. Counsel for Lindsay Corporation has agreed to accept service of process for Lindsay Sales & Services, LLC for this suit. On information and belief, Lindsay Sales & Services, LLC is a wholly-owned subsidiary of Lindsay Sales Holding Company, LLC which, in turn, is a wholly-owned subsidiary of Lindsay Corporation.

Jurisdiction and Venue

5. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendants. On information and belief, Defendant Lindsay Corporation is incorporated in Delaware, regularly does or solicits business in this jurisdiction, engages in other persistent courses of conduct in this jurisdiction, and/or derives substantial revenue from goods and services provided to persons or entities in Delaware. In addition, the Court has personal jurisdiction over Defendants because they have established minimum contacts with the forum and the exercise of jurisdiction over Defendants would not offend traditional notions of fair play and substantial justice. In accordance with established distribution channels for the accused products, Defendants reasonably anticipated that the accused products would end up in this District and be sold herein.

7. Venue in this jurisdiction as to Lindsay Corporation is proper under 28 U.S.C. §§ 1391 and 1400(b). Lindsay Sales & Services, LLC has agreed to waive any objections to venue in this jurisdiction for purposes of this suit.

Background

8. Valmont is one of the world's leading providers of engineered products and services for infrastructure, and irrigation equipment for agriculture.

9. As an industry leader, Valmont began developing a new product for reading the status of and remotely controlling irrigation components and ancillary equipment. At that time, the devices available for remotely controlling irrigation systems were limited to base station controls and remote-mount control panel systems. Base station controls used RF telemetry or cell phone telemetry to read the status of and control irrigation components from a personal computer, but these systems suffered from the disadvantage that they required a user to be physically at the computer to utilize the controls. Therefore, if a user was viewing irrigation equipment in the field and realized actions that needed to be taken immediately, the user would have to travel back to the base station computer to invoke those actions.

10. The second option for remotely controlling irrigation systems at the time of Valmont's invention was remote-mount control panels. These panels were mounted at locations in the field away from the components they controlled, which provided users with access to controls in the field but also required burying power and control wires in the field. These systems also disadvantageously limited the points of access to the control systems to those locations where the control panels were mounted.

11. Valmont's engineers discovered that the processes for remotely controlling irrigation equipment could be vastly improved by deploying a remote user interface—a separate unit from the irrigation component controller—and equipping the remote user interface in a manner that would allow a user to remotely check on the status of and control irrigation equipment. The remote user interface would be housed in a handheld device, thereby equipping the user with

the ability to monitor and control the equipment from anywhere, rather than being limited to a central computer or mounted stations, as in the prior art.

12. Additionally, Valmont's engineers developed particular methods for collecting and displaying the information necessary to monitor the equipment and effectively control the equipment from a handheld device. In particular, a difficulty that had previously inhibited the use of handheld devices to monitor and control irrigation equipment was their inherently small screens. Valmont's engineers developed novel graphical user interfaces, particular to the application relating to the monitoring and controlling of irrigation equipment, that could represent a lot of information in a relatively small area, yet still be quickly and easily read. Among these innovations were graphical user interfaces that are shaped to represent one or more data and whose shape may change in response to changes in the data. Further, Valmont was the first in the industry to allow customization of the remote user interface's screens based on user preferences and/or the structural characteristics of the equipment being monitored and controlled. This facilitated display of only relevant information, further improving the efficiency of using the remote user interface.

13. Valmont's engineers filed for a patent on their invention and were granted U.S. Patent No. 7,003,357 on February 21, 2006, which the inventors then assigned to Valmont.

COUNT I

Infringement of U.S. Patent No. 7,003,357 C2 Pursuant to 35 U.S.C. § 271

14. Valmont is the owner of the entire right, title, and interest in the '357 Patent, including the right to exclude Lindsay and to enforce, sue and recover damages for past and future infringement against Lindsay. A true and correct copy of the '357 Patent is attached as Exhibit A.

15. The '357 Patent is valid, enforceable, and was duly issued on February 21, 2006, in full compliance with Title 35 of the United States Code. On April 7, 2016, an *ex parte* reexamination request was filed for the '357 Patent, and the PTO issued a reexamination certificate

on February 9, 2017, in which it cancelled Claim 16 of the '357 Patent and added new claims 19-90. A true and correct copy of the reexamination certificate is attached as Exhibit B. On April 10, 2017, a second *ex parte* reexamination request was filed for the '357 Patent. The PTO issued a second reexamination certificate on January 17, 2018, in which Claims 19-21 and 23 were amended. A true and correct copy of the second reexamination certificate is attached as Exhibit C.

16. On information and belief, Lindsay has been, and now is, directly infringing at least claims 11 and 25-90 of the '357 Patent in this District and elsewhere in the United States, without the consent or authorization of Valmont, by or through its making, having made, sale, offer for sale, and/or use in the United States of the patented systems and methods which comprise a method and means for reading the status of and controlling irrigation components, including at least its FieldNET suite of products, which are covered by at least claims 11 and 25-90 of the '357 Patent.

17. For example, Lindsay directly infringes at least Claim 25 of the '357 Patent when Lindsay employees use the FieldNET software on a handheld device. Lindsay's FieldNET products provide a remote user interface for reading the status of and controlling irrigation systems virtually from anywhere using the wireless capabilities of, for example, a tablet or smartphone.

See, *e.g.,*


http://www.myfieldnet.com/stuff/contentmgr/files/2/090323f54ebfaee11b73a9cc0ae9566e/files/lindsay_fieldnet_bro_0414_web.pdf:

FIELDNET
BY LINDSAY

FIELDNET® | WIRELESS IRRIGATION MANAGEMENT



WEB BASED • MOBILE APPS • PUMP CONTROL • FIELDNET PRO



FieldNET Mobile

Convenient control and monitoring – in the palm of your hand

FieldNET Mobile apps for major smartphones and tablets combine the benefits and time-saving innovation of FieldNET with the convenience of Web-enabled tablets.

FieldNET Mobile gives you what you need in real time. Featuring an easy-to-use interface, FieldNET Mobile allows users to monitor and control irrigation equipment from virtually anywhere.

Get a comprehensive view
When you want to make sure your pivot is reaching every part of your field, count on FieldNET

giving you an in-depth view of individual pivots. Not only can you track your pivots, but you can adjust them accordingly, wherever you are or whatever type of pivots you use.

Start saving
Experience the convenience of FieldNET. Fewer trips to the field means using less fuel and labor.




Quick and easy control with detailed dashboard and wizard functionality guiding users through the selection option

FieldNET Mobile's user-friendly interface provides full remote access from your smartphone or tablet.

BENEFITS OF FIELDNET MOBILE

- Save money with fewer trips to the field
- User-friendly interface for fast remote access
- Receive real-time alerts, reducing the risk of unplanned downtime
- Know the status of all equipment immediately from one color-coded list
- Map view provides system insights and locations of equipment
- Quick link to full Web Portal features, such as end-user and irrigation plans



FieldNET mobile apps work with iPhone®, iPad® and Android™ platforms so you can check systems from virtually anywhere.

Everything in one powerful application

- Control pivots, laterals, end guns, injectors and pumps
- Monitor and record water usage, energy usage, tank or pond levels
- Expand capabilities with plug & play add-ons
- Keep up-to-date with real-time alerts
- Monitor weather information such as temperature, rainfall, humidity and wind speed
- Manage groups of equipment and people
- Run reports


Search FIELDNET on the App Store™ and Google Play™

Available on the **App Store** **ANDROID APP ON Google play**

Apple, the Apple logo, iPhone and iPad are trademarks of Apple Inc., registered in the U.S. and other countries. App Store is a service mark of Apple Inc.
Google Play is a trademark of Google, Inc.

FieldNET's remote user interface provides the status of irrigation equipment and further allows a user to control irrigation equipment including a pivot and at least two end-guns affixed to the pivot.


See, e.g., <http://www.myfieldnet.com/remote-management>:



MAP VIEW
Map view provides at a glance insights of operation status so users can see the whole operation.

Would you like to provide access to other people that help your operations? No problem, you can simply provide them their own secure username and password to access only the equipment you choose them to see. In addition, you can restrict control by allowing them read-only privileges.

Your phone or tablets "locate me" feature shows your location on the map view. This can be very helpful for part time helpers, people that deliver chemicals, field scouts, etc.




PIVOT AND LATERAL MONITORING AND CONTROL
 Quickly control pivots and laterals. A wizard guides users through the selection of control options. Monitor the following for pivots and laterals:

- Operational status
- Irrigation start location
- Current location in the field
- Irrigation stop location
- Pressure, flow, and runtime

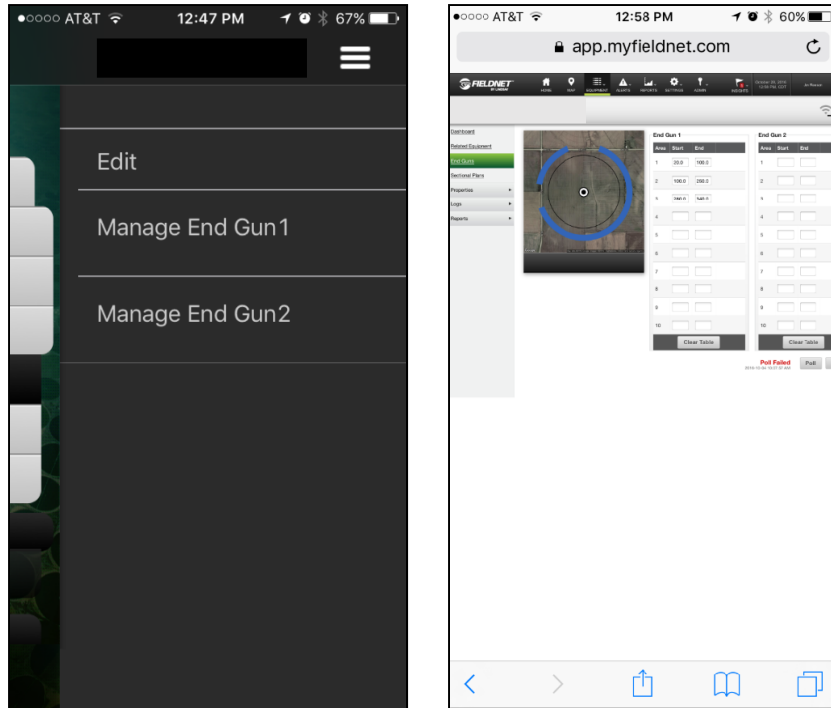
Control pivots and laterals.

- Start, Stop, and change Direction
- Adjust irrigation rates
- Control water on and off
- Set automatic stop position



PUMP STATION MONITOR AND CONTROL
 View pump stations status and control pumps.

- Monitor pressure
- Monitor flow
- Monitor inlet pressure
- Monitor water level
- Monitor power usage



18. Lindsay’s FieldNET products are designed and marketed for use with a hand-held display and processor. For example, Defendants offer FieldNET Mobile apps for download to and use on Apple and Android tablets and smartphones.

19. Lindsay Sales & Service, LLC is shown as the “Seller” of the FieldNET Mobile app available on the Apple App Store and, in fact, offers the FieldNET Mobile app for download to consumers through the Apple App Store.

20. Upon information and belief, the “Lindsay Sales & Service, LLC” referenced as the “Seller” of the FieldNET Mobile app on the Apple App Store is the same legal entity as Lindsay Sales & Services, LLC, a Nebraska limited liability company.

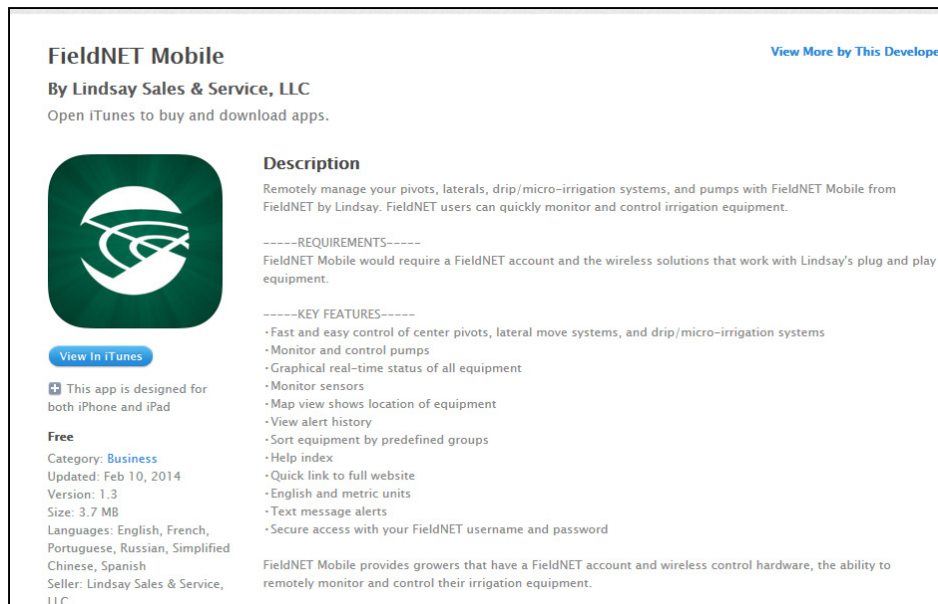
21. Upon information and belief, the “Lindsay Sales & Service, LLC” referenced as the “Seller” of the FieldNET Mobile app on the Apple App Store is an affiliate of Lindsay Corporation.

22. Lindsay Corporation is identified on Google Play as providing the FieldNET Mobile app for download to consumers through Google Play.

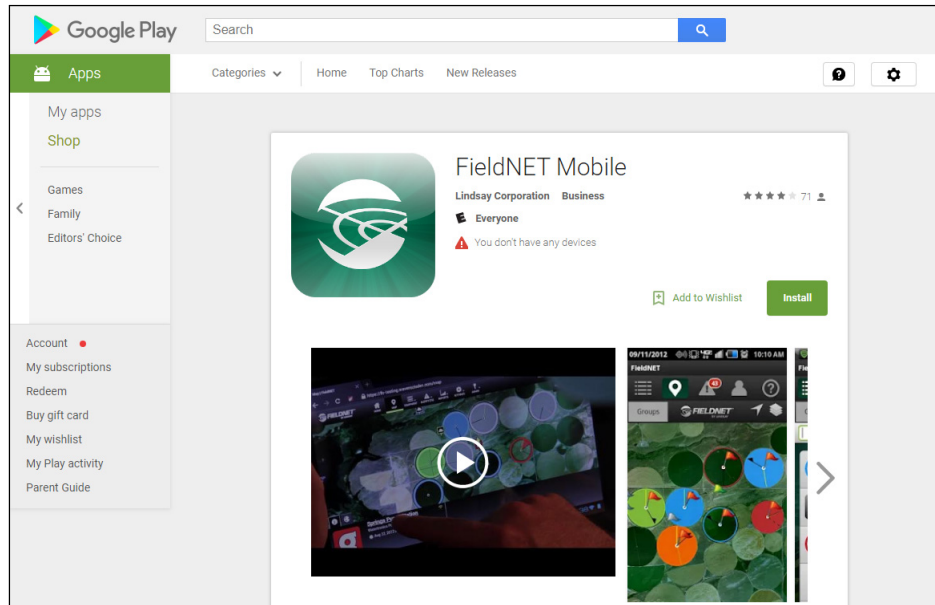
23. Upon information and belief, the user interface features of the FieldNET Mobile application offered on the Apple App Store are the same as the user interface features of the FieldNET Mobile application offered on Google Play.

24. The FieldNET suite of products are designed to be installed and run with the processor included on an iPhone or Android smartphone or iPad tablet device and inside a mobile web browser.

See, e.g., iTunes: FieldNET Mobile, available at <https://itunes.apple.com/us/app/fieldnet-mobile/id557742488?mt=8>:

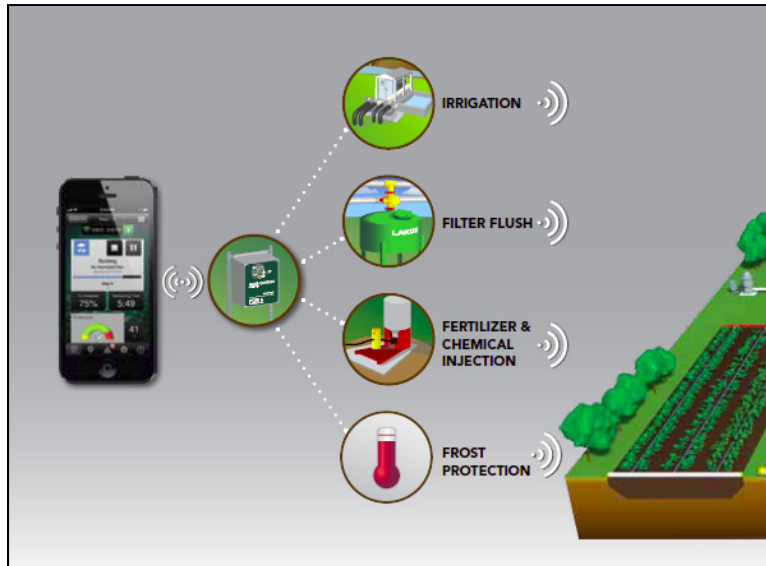


See also, e.g., Google Play: FieldNET Mobile, available at <https://play.google.com/store/apps/details?id=com.digitec.fieldnet.android>:



25. Lindsay's FieldNET products, when used with a smartphone or tablet, also transmit signals and data wirelessly between the remote user interface and the irrigation equipment. *See, e.g.,*

http://www.myfieldnet.com/stuff/contentmgr/files/2/45dc11b7503c2a562df119ed8dd723ea/pdf/fn_bro_drip_1014_web.pdf:

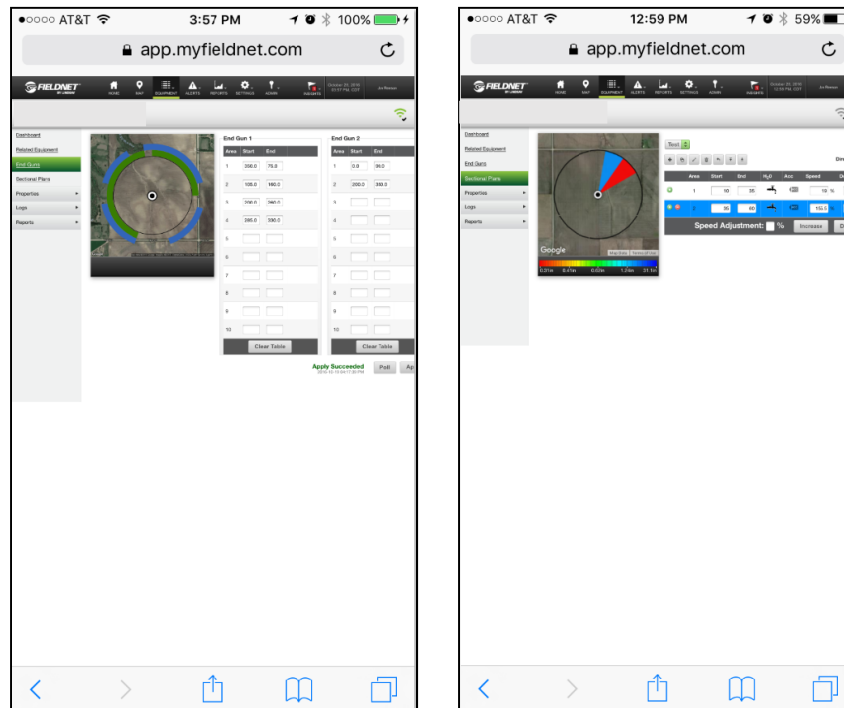


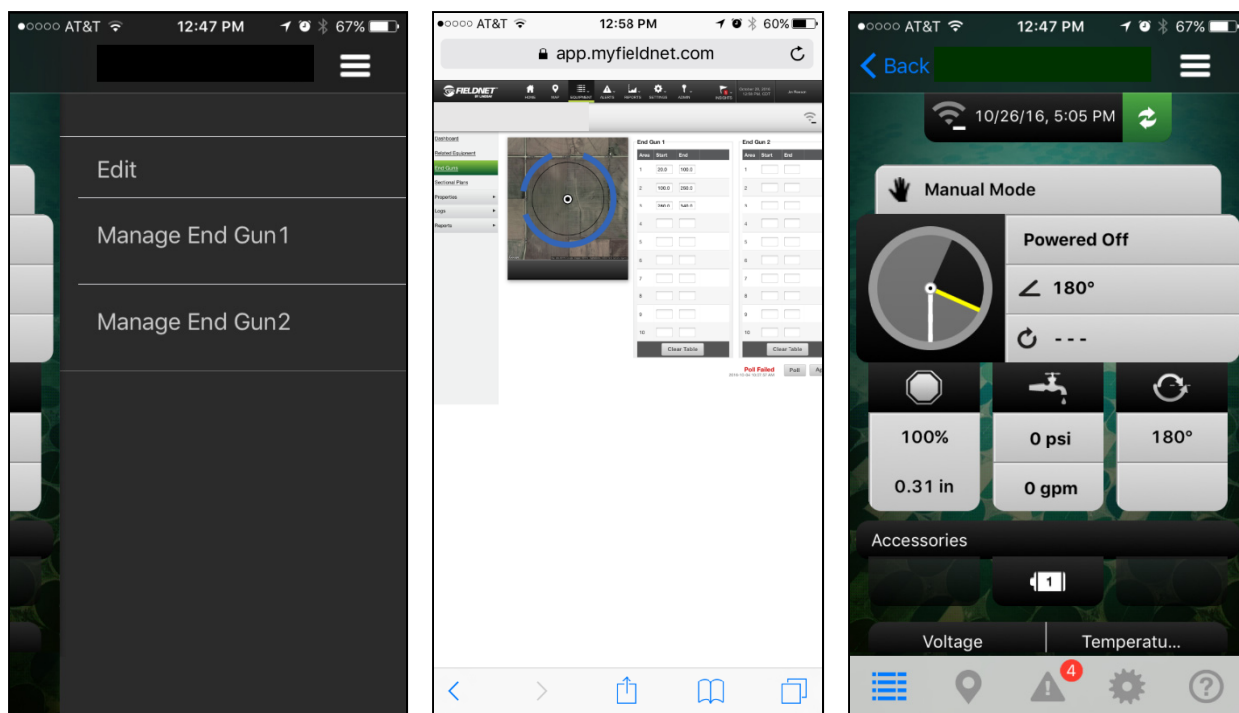
According to Lindsay’s materials, growers have “the ability to remotely monitor and control their irrigation equipment” with a FieldNET account and wireless control hardware. *See, e.g.*, iTunes:

FieldNET Mobile, available at <https://itunes.apple.com/us/app/fieldnet-mobile/id557742488?mt=8>:

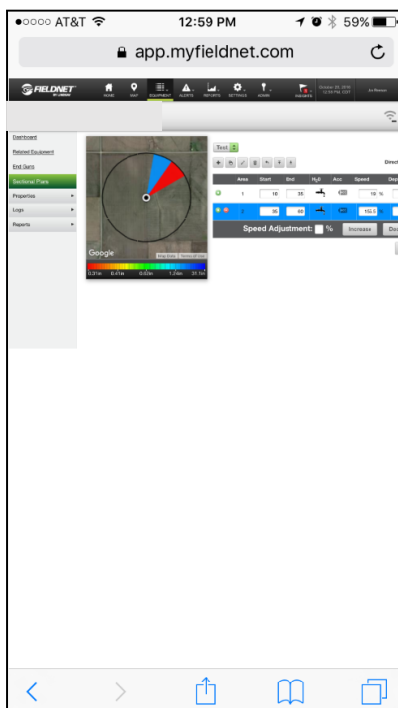
FieldNET Mobile provides growers that have a FieldNET account and wireless control hardware, the ability to remotely monitor and control their irrigation equipment.

26. Lindsay’s FieldNET products’ remote user interface also displays the irrigation equipment as a plurality of graphic user interfaces (GUIs) that are configured to present said data as status information on said display, wherein said plurality of GUIs are shaped to identify particular types of irrigation equipment by, for example, comprising a pivot GUI that represents a pivot, at least two end-gun GUIs that represent the at least two end-guns affixed to the pivot, and a spray pattern GUI that represents a setting of the at least two end-guns along a pivot path:

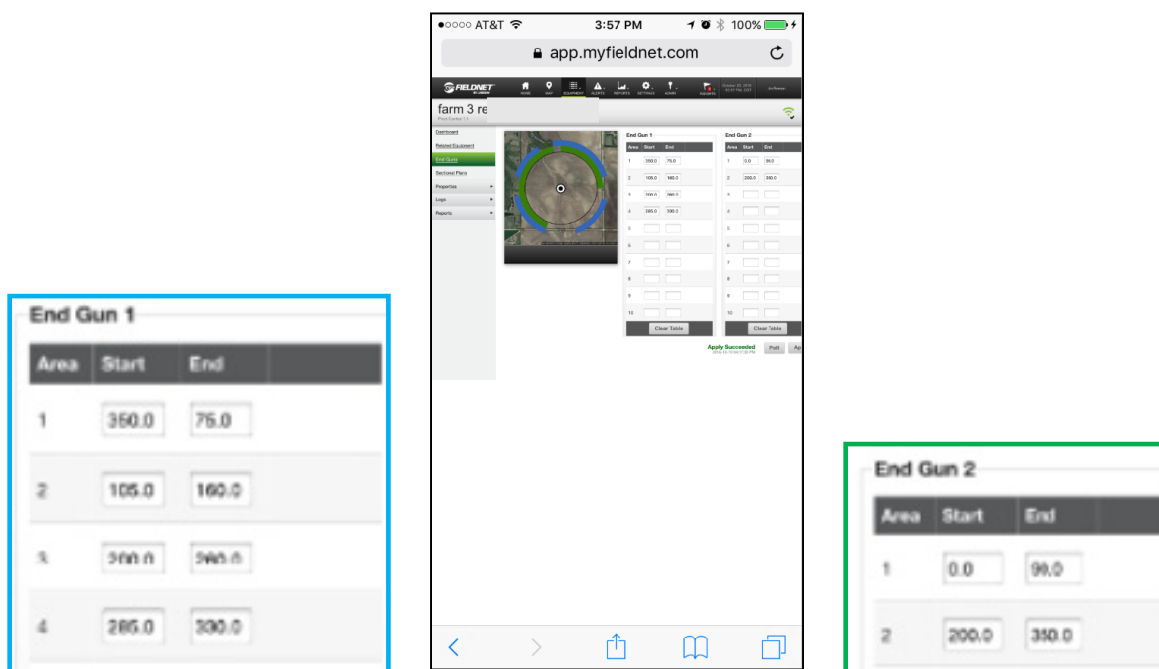




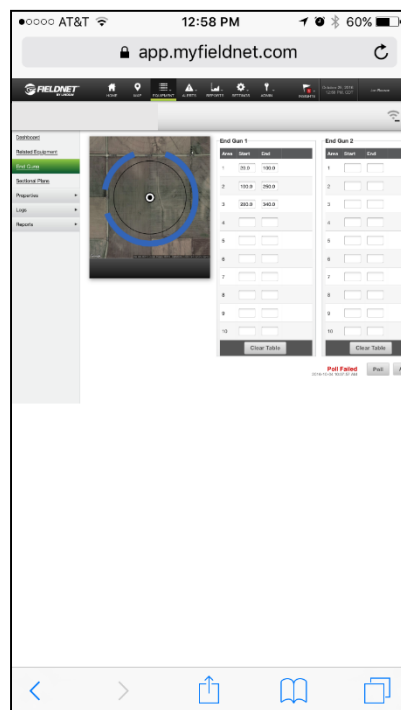
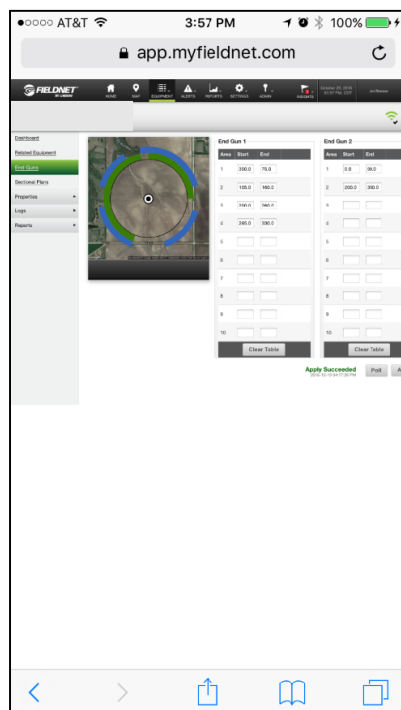
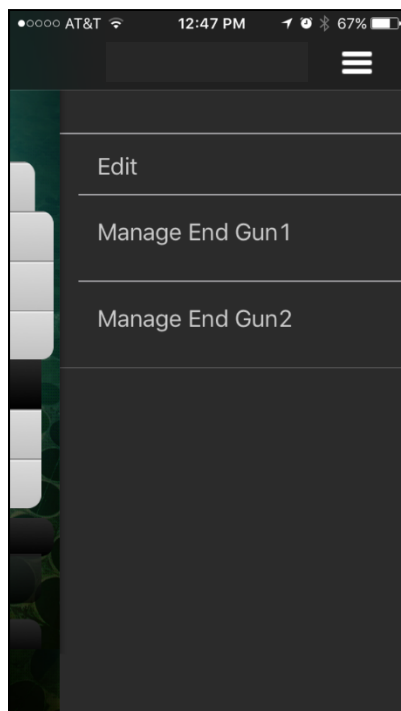
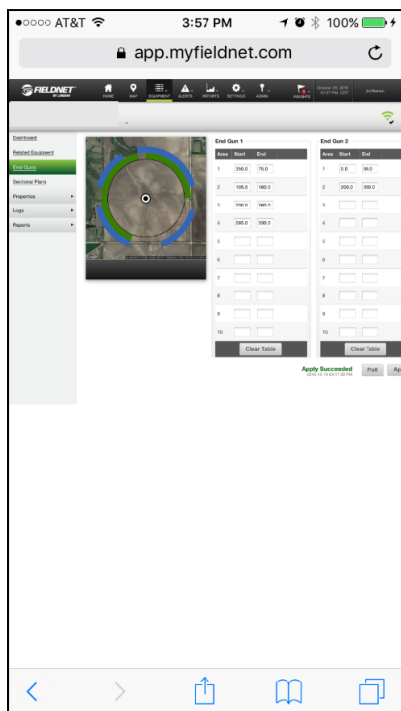
27. The remote user interface of FieldNET is comprised of a plurality of GUIs, including, for example, a pivot GUI with a shape representing the pivot path of the pivot, the shape partitioned into a plurality of wedges:



28. Lindsay's FieldNET products comprise a plurality of GUIs shaped to identify particular types of irrigation equipment by, for example, comprising a spray pattern GUI that represents a setting of the at least two end-guns along a pivot path wherein the spray pattern GUI has a spray pattern representing the setting of the at least two end-guns along the pivot path:




29. Lindsay's FieldNET products' remote user interface is configured to receive a user's commands to control the irrigation equipment, through said user's manipulation of the GUIs, comprising receiving a user's selection of a wedge, and receive a user's selection of a change of a status of one of at least two end-guns for the selected wedge:



30. Lindsay's FieldNET products, when used with a smartphone or tablet, also transmit signals to the remote irrigation equipment to control the irrigation equipment based on a user's commands. FieldNET's remote user interface further allows a user to control irrigation equipment.

See, e.g., <http://www.myfieldnet.com/remote-management>:




PIVOT AND LATERAL MONITORING AND CONTROL
Quickly control pivots and laterals. A wizard guides users through the selection of control options. Monitor the following for pivots and laterals:

- Operational status
- Irrigation start location
- Current location in the field
- Irrigation stop location
- Pressure, flow, and runtime

Control pivots and laterals.

- Start, Stop, and change Direction
- Adjust irrigation rates
- Control water on and off
- Set automatic stop position



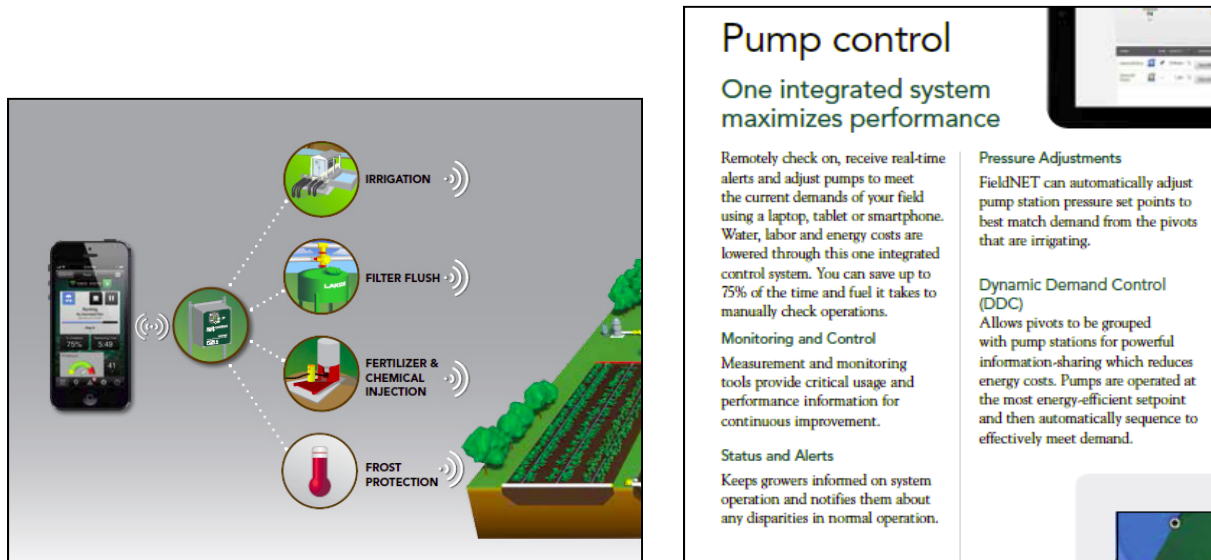
PUMP STATION MONITOR AND CONTROL
View pump stations status and control pumps.

- Monitor pressure
- Monitor flow
- Monitor inlet pressure
- Monitor water level
- Monitor power usage

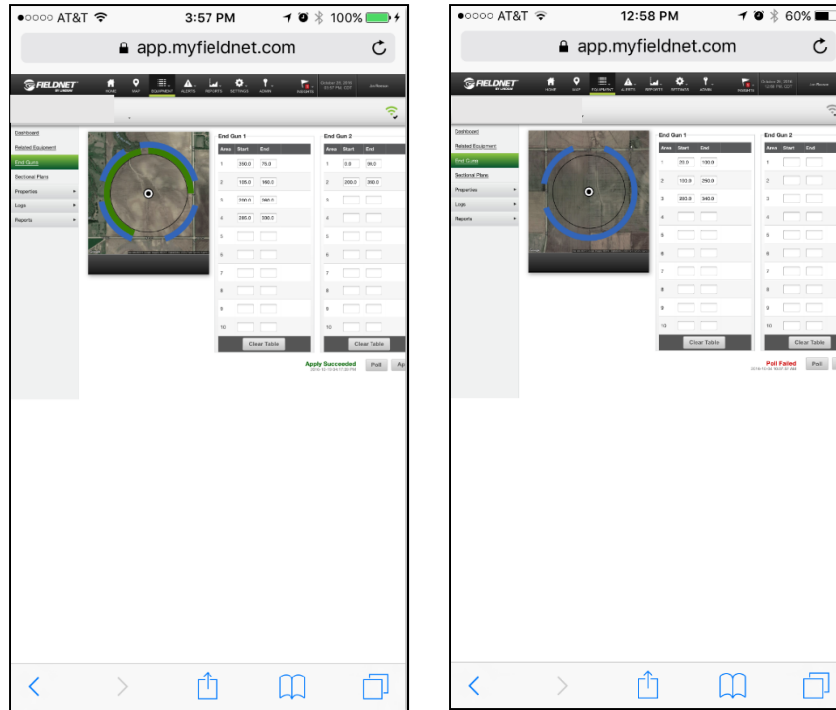
See,

e.g.,

http://www.myfieldnet.com/stuff/contentmgr/files/2/45dc11b7503c2a562df119ed8dd723ea/pdf/n_bro_drip_1014_web.pdf:



31. Lindsay's FieldNET products' user interface is configured to display, for example, a changed spray pattern of the selected wedge according to the change of status of one of the at least two end guns:



32. Lindsay has actual knowledge of the '357 Patent, and it has had actual knowledge of the '357 Patent since at least the filing of Valmont's Original Complaint on January 15, 2015. Lindsay has nonetheless continued infringing at least claims 11 and 25-90 of the '357 Patent.

33. On information and belief, Lindsay knew, or should have known, as early as August 2015, that Lindsay and/or its customers infringe the '357 Patent by use of the Lindsay FieldNET software on a smartphone or tablet. Lindsay now employs, or has employed, several high level employees who previously served in high-level positions at Valmont. On information and belief, some of these individuals, including Kurtis Charling, Brian Ketcham, Albert Maurin, Craig Malsam, and Tom Spears, knew about, or could have learned about the '357 Patent while they were working at Valmont. In particular, one high-level employee, Craig Malsam, who served as Vice President of Engineering and R&D at Valmont from 1999 until mid-2015, is a named inventor of the '357 Patent and hence did know about the '357 Patent and its claims. During his employment at Valmont and prior to his departure from Valmont in mid-2015, Mr. Malsam was

familiar with the features of Lindsay's FieldNET software. On information and belief, since August 2015, Mr. Malsam has been Vice President of Engineering and New Product Development at Lindsay Corporation. Consequently, it is likely that Mr. Malsam, and thus Lindsay, knew, as of August 2015, that Lindsay and its customers infringed the '357 Patent by using the FieldNET software on a smartphone or tablet.

34. On information and belief, Albert Maurin, who served as Product Development Manager at Valmont from 2013-2015, knew about the '357 Patent and its claims while at Valmont. During his employment at Valmont and prior to his departure from Valmont in 2015, Mr. Maurin was familiar with the features of Lindsay's FieldNET software. On information and belief, since 2016, Mr. Maurin has been a FieldNET Product Specialist at Lindsay Corporation. Consequently, it is likely that Mr. Maurin, and thus Lindsay, knew, as of 2016, that Lindsay and its customers infringed the '357 Patent by using the FieldNET software on a smartphone or tablet.

35. On information and belief, Kurtis Charling, who served as Senior Product Support Specialist at Valmont from 2012-2014, knew about the '357 Patent and its claims while at Valmont. During his employment at Valmont and prior to his departure from Valmont in 2014, Mr. Charling was familiar with the features of Lindsay's FieldNET software. On information and belief, since 2015, Mr. Charling has been a Manager of FieldNET Business Solutions at Lindsay Corporation. Consequently, it is likely that Mr. Charling, and thus Lindsay, knew, as of 2015, that Lindsay and its customers infringed the '357 Patent by using the FieldNET software on a smartphone or tablet.

36. On information and belief, Brian Ketcham, who served as VP and Group Controller at Valmont from 2001-2016, knew about the '357 Patent and its claims while at Valmont. During his employment at Valmont and prior to his departure from Valmont in 2016, Mr. Ketcham was

familiar with the features of Lindsay's FieldNET software. On information and belief, since April of 2016, Mr. Ketcham has been VP and CFO of Lindsay Corporation. Consequently, it is likely that Mr. Ketcham, and thus Lindsay, knew, as of 2016, that Lindsay and its customers infringed the '357 Patent by using the FieldNET software on a smartphone or tablet.

37. On information and belief, Lindsay acted and has acted with full knowledge of the '357 Patent and without a reasonable basis for believing that it would not be liable for actively inducing or contributing to the infringement of the '357 Patent. At minimum, Lindsay was and continues to be willfully blind to the existence of the '357 Patent and continues to sell, use, and direct others to use its infringing FieldNET products in infringing manners.

38. On information and belief, Lindsay takes active steps to induce infringement by others of one or more claims of the '357 Patent in violation of 35 U.S.C. § 271(b), including customers that purchase Lindsay's FieldNET products. Such active steps include, but are not limited to, encouraging, advertising (including by internet websites), promoting, and instructing others to use and/or how to use the capabilities of its FieldNET products for reading the status of and controlling irrigation components. For example, Lindsay advertises and encourages the use of its products to remotely control irrigation equipment using smartphones and tablets. *See, e.g.,* <http://www.myfieldnet.com/remote-management>.

39. On information and belief, Lindsay knows or should know that such activities induce others to directly infringe one or more claims of the '357 Patent. For example, Lindsay should have known that its actions induced others to directly infringe at least one claim of the '357 Patent as of at least August 2015.

40. On information and belief, Lindsay contributes to the infringement of one or more claims of the '357 Patent by others, including its customers, distributors, and authorized resellers

in violation of 35 U.S.C. § 271(c). Acts by Lindsay that contribute to the infringement of others include, but are not limited to, the sale, offer for sale, and/or import by Lindsay of its FieldNET products. Such products are especially made for or adapted for use to infringe, are not staple articles of commerce, and are not suitable for substantial non-infringing use. For example, whatever features FieldNET may encompass, those features are provided for the purpose of remotely monitoring and controlling irrigation equipment using a handheld device, exactly as the

'357 Patent claims. See, e.g., http://www.lindsay.com/stuff/contentmgr/files/0/ba6f2b5f3ec1890a9ef3dbe9f61f47c5/pdf/lindsay_fieldnet_bro_pivotlat_0315_web.pdf:

THE MOST COMPREHENSIVE

FieldNET provides the most comprehensive options to remotely control entire irrigation systems. This platform delivers greater control, real-time information and enhanced management tools – all in one platform.

This means that at any time throughout the crop lifecycle, you can see exactly what your systems are doing and control them quickly and easily from a laptop, tablet or smartphone.

For instance, to the extent Lindsay's FieldNET allows a user to monitor weather information, it is to permit him to “make knowledgeable irrigation decisions” about how to control his irrigation equipment. *See id.*:



MONITOR SOIL MOISTURE AND WEATHER

Check status, track trends and run reports on individual fields to make knowledgeable irrigation decisions.

Consequently, Lindsay's FieldNET does not have a substantial non-infringing use despite having a variety of features that may be tangential to the claimed invention of the '357 Patent but nonetheless relevant.

41. On information and belief, as of at least August 2015, Lindsay has known of the '357 Patent and performs acts that it knows, or should know, induce, and/or contribute to the direct infringement of at one or more claims of the '357 Patent by others.

42. Lindsay has engaged in egregious infringement behavior with knowledge of the '357 Patent, which has been duly issued by the USPTO, and is presumed valid. On information and belief, as of August 2015, Lindsay has known or should have known that its actions constituted and continue to constitute infringement of the '357 Patent and that the '357 Patent is valid. Lindsay could not reasonably, subjectively believe that its actions do not constitute infringement of the '357 Patent, nor could it reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Lindsay has continued its infringing activities. As such, Lindsay willfully infringes the '357 Patent.

43. By its actions, Lindsay has injured Valmont and is liable to Valmont for infringement of the '357 Patent pursuant to 35 U.S.C. § 271.

44. By its actions, Lindsay's infringement of the '357 Patent has irreparably injured Valmont. Unless such infringing acts are enjoined by this Court, Valmont will continue to suffer additional irreparable injury.

45. By its actions, Lindsay's infringement of the '357 Patent has damaged, and continues to damage, Valmont in an amount yet to be determined, of at least a reasonable royalty and/or lost profits that Valmont would have made but for Lindsay's infringing acts

PRAYER FOR RELIEF

WHEREFORE, Valmont respectfully requests that this Court enter:

- A. That the '357 Patent has been infringed by Lindsay;
- B. That Lindsay's infringement of the '357 Patent has been willful;
- C. An award of damages adequate to compensate Lindsay for the patent infringement that has occurred, together with pre-judgment interest and costs;
- D. An accounting for acts of infringement not presented at trial and/or up to the judgment and an award by the Court of additional damage for any such acts of infringement;
- E. A preliminary and permanent injunction against Lindsay from further infringement, or alternatively, award an ongoing royalty for Lindsay's post-verdict infringement, payable on each product or service offered by Lindsay that is found to infringe one or more of the patent asserted herein, and on all future products and services that are not colorably different from those found to infringe;

- F. An award of all other damages permitted by 35 U.S.C. § 284, including increased damages up to three times the amount of compensatory damages found;
- G. A finding that this is an exceptional case and an award to Valmont of its costs and reasonable attorneys' fees incurred in this action as provided by 35 U.S.C. § 285; and
- H. Such other relief, including other monetary and equitable relief, as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Dated: April 23, 2018

FISH & RICHARDSON P.C.

By: /s/ Susan E. Morrison

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