IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

POSITIONTECH LLC, Plaintiff, v. SALTO SYSTEMS INC. and GREAT WOLF LODGE OF GEORGIA, LLC, Defendants.	Civil Action No. _____ **JURY TRIAL DEMANDED**

COMPLAINT

For its Complaint, Plaintiff Positiontech LLC ("Positiontech"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Positiontech is a Texas limited liability company with a place of business located at 1400 Preston Road, Suite 400, Plano, Texas 75093.

2. Defendant Salto Systems Inc. ("Salto") is a Georgia company, with, upon information and belief, a place of business located at 1780 Corporate Drive, Suite 400, Norcross, Georgia 30093.

3. Defendant Great Wolf Lodge of Georgia, LLC is a Delaware company with, upon information and belief, a place of business located at 150 Tom Hall Parkway, LaGrange, Georgia 30240.

4. Salto Systems Inc. and Great Wolf Lodge of Georgia, LLC are collectively referred to herein as "Defendants."

JURISDICTION AND VENUE

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

6. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

7. Upon information and belief, Defendants conduct 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 this district.

8. Venue is proper in this district pursuant to § 1400(b).

THE PATENTS-IN-SUIT

9. On June 13, 2006, U.S. Patent No. 7,061,384 (the "'384 patent"), entitled "Positional Information Management System," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the

‘384 patent is attached hereto as Exhibit A.

10. On November 15, 2005, U.S. Patent No. 6,965,317 (the “’317 patent”), entitled “Positional Information Management System,” was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the ‘317 patent is attached hereto as Exhibit B.

11. Positiontech is the assignee and owner of the right, title and interest in and to the ‘384 and ‘317 patents, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,061,384

12. Positiontech repeats and realleges the allegations of paragraphs 1 through 11 as if fully set forth herein.

13. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendants are liable for infringement of at least claim 1 of the ‘384 patent by making, using, importing, offering for sale, and/or selling, positional information management systems, including, but not limited to, Salto ProAccess (“ProAccess”), because each and every element is met either literally or equivalently.

14. More specifically, and upon information and belief, ProAccess is a positional information management system. ProAccess includes a positional

information management server (e.g., "online event monitoring through web browser permitting real-time visibility of all events at online doors") including a memory (e.g., SQL database) and a clock.

Main Features

User friendly:

- 100% web-based software that facilitates the set-up, routine use and monitoring, as well as any updating and changing of access rights.
- Web-based interface means no need to install the software on all client PCs.
- Easy installation process that includes a powerful SQL engine. Database protected by SQL authentication or windows-based authentication.
- Multi-language and configurable interface makes it easy to adjust the interface to the specific needs and security level of each operator, including operator password protection for higher security.
- Online event monitoring through web browser permitting real-time visibility of all events at online doors.
- Incorporate user photos to facilitate easy and fast identification of users at online access points.
- Easier set-up of the XS4 2.0 Controller inputs and outputs through a userfriendly wizzard template.

https://www.saltosystems.com/en-us/product-range/product/514/xs4-software-proaccess-space/.

Hardware requirement for server:

- Processor: 1 GHz or higher. 32Bits or 64Bits.
- RAM: 4 GB.
- Hard disk space required: 10 GB. (Aprox., depends on the DB).

Hardware requirement for client:

- Processor: 1.6 GHz or higher. 32Bits or 64Bits.
- RAM: 1 GB.
- NET framework: V.40.2

HTML5:

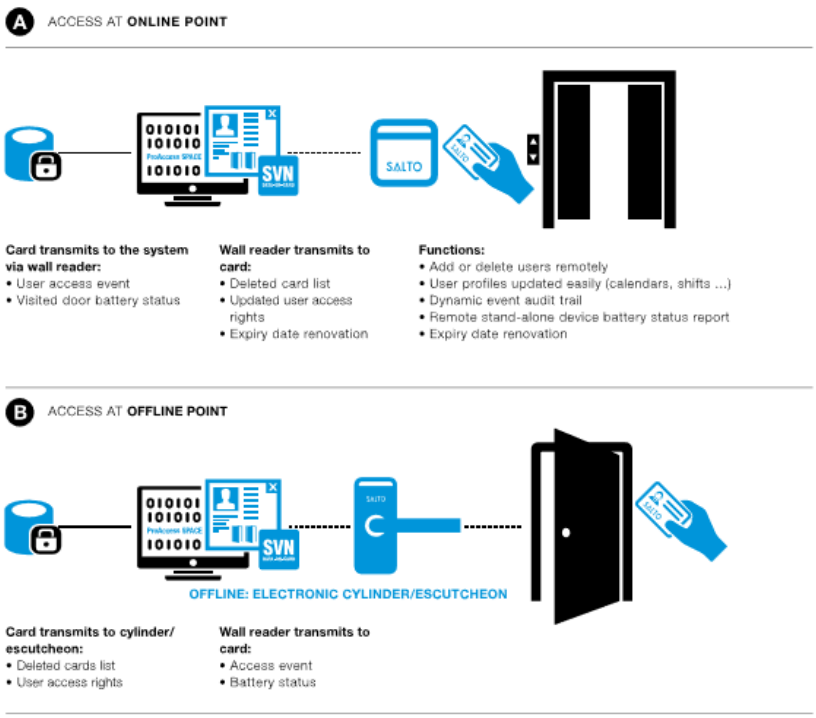
- Supports all major web browsers like Chrome, Firefox, Edge, and Safari...

SQL database engine compatibility:

- SQL LocalDB (included in ProAccess SPACE software - SQL Server 2012Express)
- SQL Server 2014
- SQL Server 2012
- SQL Server 2008 R2

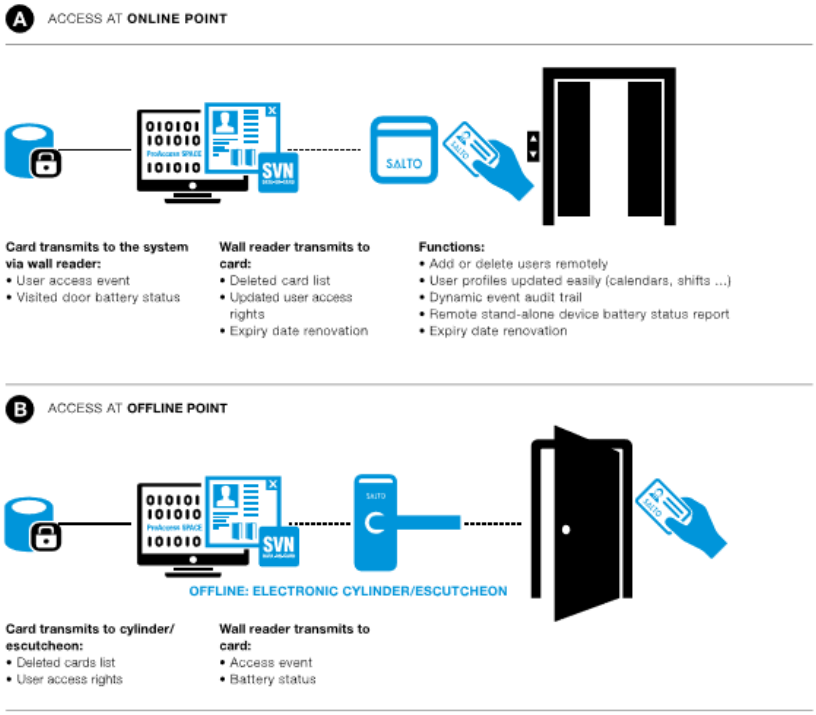
Id. Users in a facility employing ProAccess may carry a card comprising a tag IC storing a tag ID (e.g., RFID card).

The SALTO Virtual Network (SVN) provides the flexibility for an access control system to grow from a small number of doors and users to a large number of doors and users as required. It allows stand-alone locks to read, receive and write information via an encrypted and secure data-on-card system that utilizes the capabilities of RFID read/write technology. In SVN all access data is stored on and distributed by its operating smartcard. When presenting a smartcard to an offline stand-alone door, not only does this control access rights to that door but thanks to two-way communication, the door also writes data like blacklist information or battery status back to the smartcard. The smartcard then transmits this information back to the server via online wall readers that are able to update and receive information from the cards anytime and anywhere in the building.

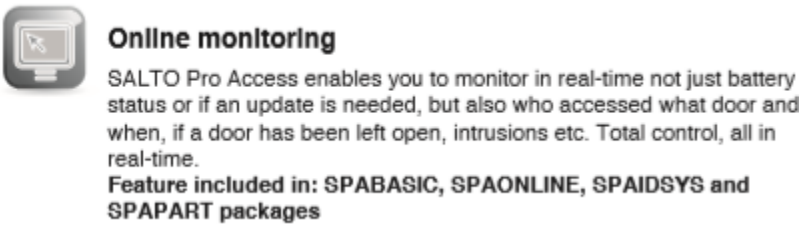


https://www.saltosystems.com/en-us/product-range/explanation/104/salto-virtual-network-svn/. ProAccess employs a plurality of detectors (e.g., wall readers) which communicate with the positional information management server.

The SALTO Virtual Network (SVN) provides the flexibility for an access control system to grow from a small number of doors and users to a large number of doors and users as required. It allows stand-alone locks to read, receive and write information via an encrypted and secure data-on-card system that utilizes the capabilities of RFID read/write technology. In SVN all access data is stored on and distributed by its operating smartcard. When presenting a smartcard to an offline stand-alone door, not only does this control access rights to that door but thanks to two-way communication, the door also writes data like blacklist information or battery status back to the smartcard. The smartcard then transmits this information back to the server via online wall readers that are able to update and receive information from the cards anytime and anywhere in the building.



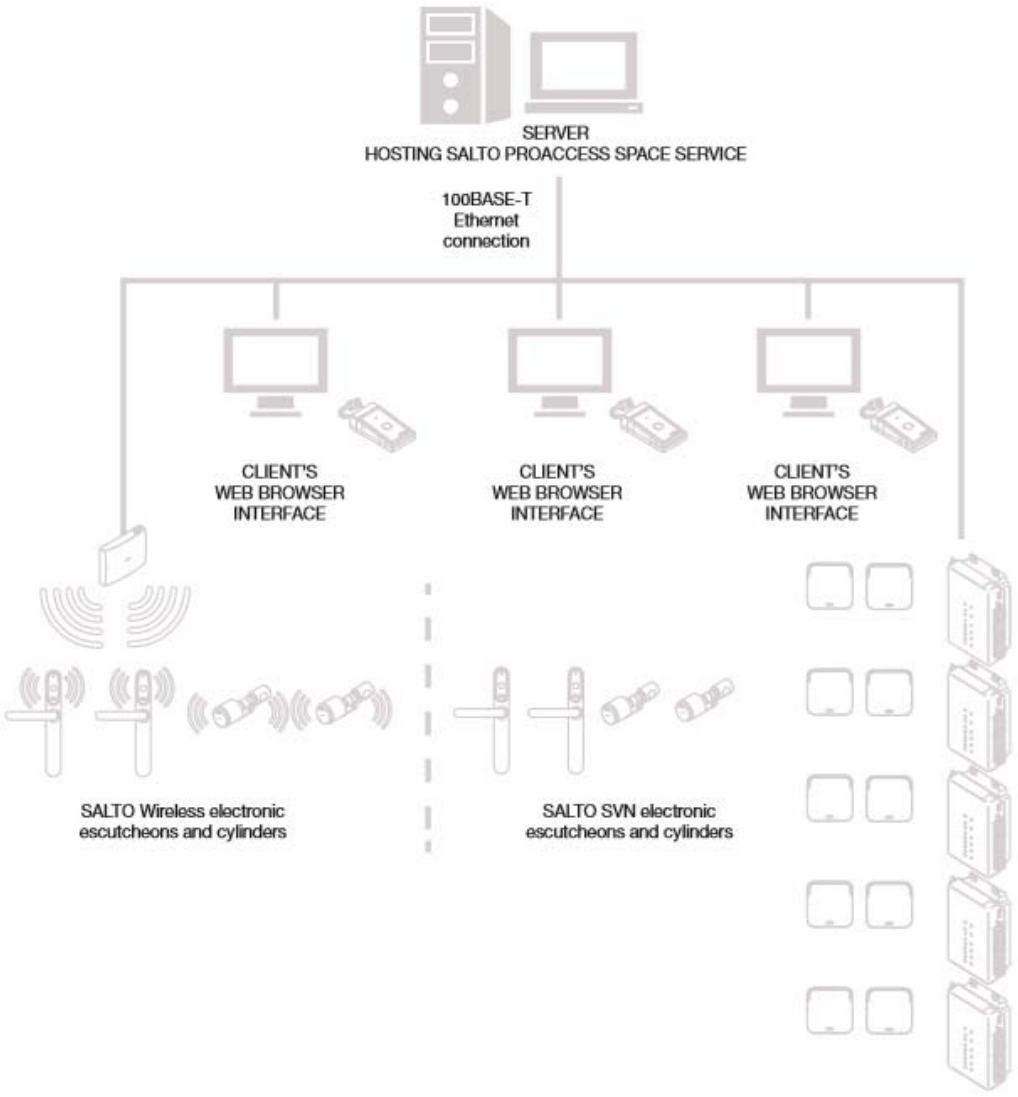
Id. Each detector has a detector ID (e.g., "who accessed what door and when") and a detection range (e.g., active RFID range).



Datasheet ("Datasheet") at p. 3 (available at http://www.tmbaccesscontrol.com/wp-content/uploads/2016/06/Proaccess-Space-Datasheet-PA_SPACE-ENG-09-15.pdf). The detectors may be installed at locations in the facility for detecting the presence of the card when the card is in the detection range. The system is operable to detect the tag ID from the tag IC via RFID read/write technology (e.g., "control access rights").

> The SALTO Virtual Network (SVN) provides the flexibility for an access control system to grow from a small number of doors and users to a large number of doors and users as required. It allows stand-alone locks to read, receive and write information via an encrypted and secure data-on-card system that utilizes the capabilities of RFID read/write technology. In SVN all access data is stored on and distributed by its operating smartcard. When presenting a smartcard to an offline stand-alone door, not only does this control access rights to that door but thanks to two-way communication, the door also writes data like blacklist information or battery status back to the smartcard. The smartcard then transmits this information back to the server via online wall readers that are able to update and receive information from the cards anytime and anywhere in the building.

https://www.saltosystems.com/en-us/product-range/explanation/104/salto-virtual-network-svn/. Each ProAccess detector transmits the tag ID and detector ID to the positional information management system. As shown below, the Salto wireless electronic locks connect to the server hosting the ProAccess Space Service.



Datasheet at p.5. The server memory records the tag ID, the detector ID and the time at which the detector detected the tag ID.

Main Features

User friendly:

- 100% web-based software that facilitates the set-up, routine use and monitoring, as well as any updating and changing of access rights.
- Web-based interface means no need to install the software on all client PCs.
- Easy installation process that includes a powerful SQL engine. Database protected by SQL authentication or windows-based authentication.
- Multi-language and configurable interface makes it easy to adjust the interface to the specific needs and security level of each operator, including operator password protection for higher security.
- Online event monitoring through web browser permitting real-time visibility of all events at online doors.
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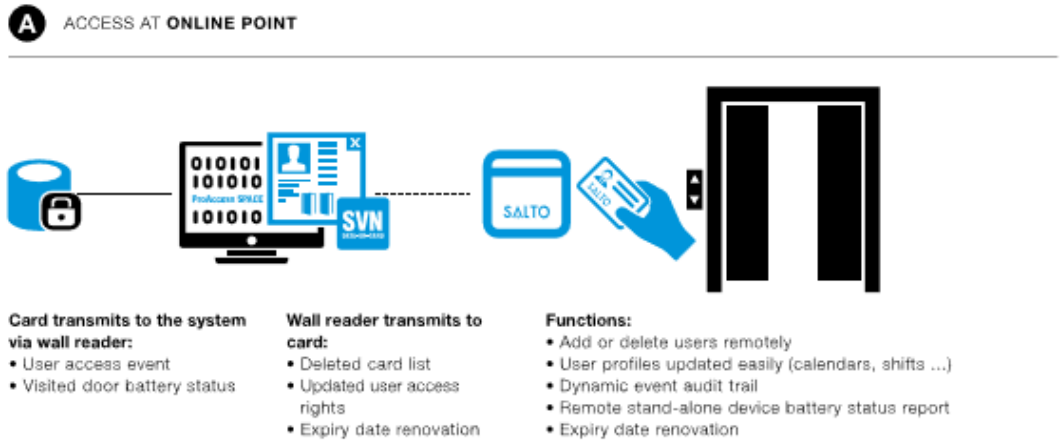


https://www.saltosystems.com/en-us/product-range/explanation/104/salto-virtual-network-svn/.

15. Positiontech is entitled to recover from Defendants the damages sustained by Positiontech as a result of Defendants' infringement of the '384 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.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 6,965,317

16. Positiontech repeats and realleges the allegations of paragraphs 1 through 15 as if fully set forth herein.

17. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendants are liable for infringement of at least claim 1 of the '317 patent by making, using, importing, offering for sale, and/or selling, positional information management systems, including, but not limited to, Salto ProAccess ("ProAccess"), because each and every element is met either literally or equivalently.

18. More specifically, and upon information and belief, ProAccess is a positional information management system. A Salto RFID card is issued to and may be carried by a user in a hotel. The cards have a tag IC which stores a tag ID.

SALTO Hospitality VIEW ALL PRODUCTS

SALTO solutions for business hotels are specially tailored to streamline the guest experience and create customer loyalty, allowing for quick check-in, easy access around the property and guaranteed security.The business guest will want the hotel experience to reflect the highest standard of efficiency and comfort so he/she can focus on what they came to do.

SALTO solutions are working in more than 6000 luxury and resort hotels worldwide, in addition to other types of guest accommodations, vacation properties and holiday resorts.

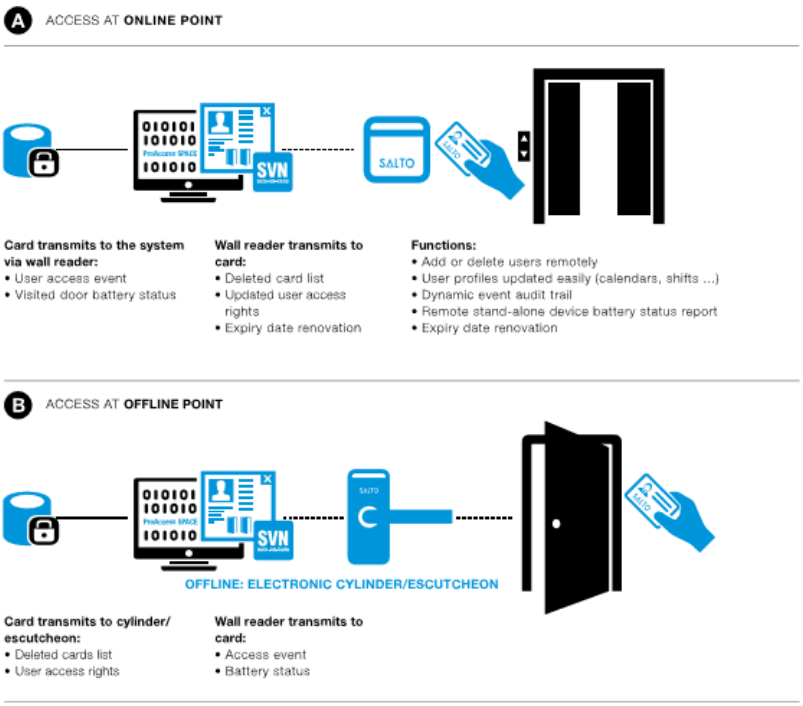
With JustIN Mobile Key, we ask the guest how he or she wants to receive the room key, and just the ability to offer this choice creates a lot of interest. And because there clearly is a guest segment that really values new technologies, we knew that our hotel had to be a pioneer in this area.
Guillaume Fontagne, General Manager, Astoria 7 Hotel - San Sebastian, Spain

SALTO adds value to any hotel by providing security and reliable access control 24/7 that covers the entire property:

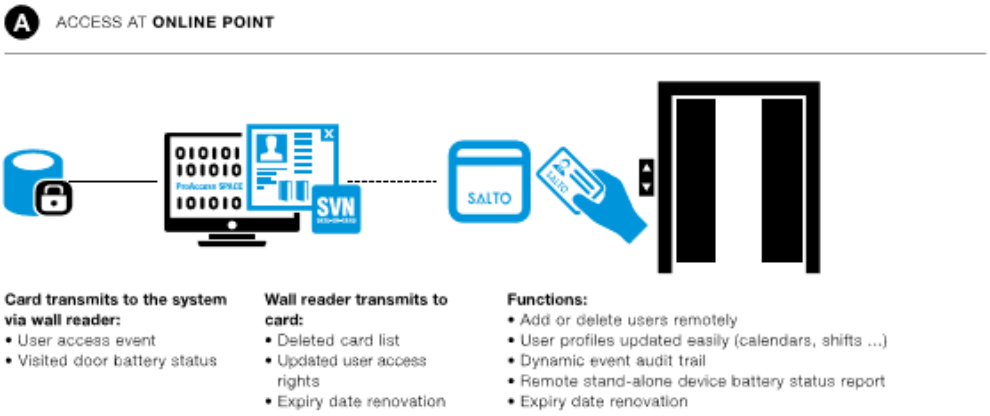
- Provide a value-added experience for guests with SALTO's JustIN Mobile Key technology that allows guests to use their smartphone as their room key.
- Enhance productivity and management with instant re-rooming, group check-in, and extended stay functionalities.
- Optimize the flexible use of hotel resources such as seminar and gala rooms, pool and spa/wellness areas, golf and other sport facilities and parking areas that easily permits the individual programming of specific installations.
- Provide a more comfortable stay for guests with the Privacy mode option that shows in real-time if a guest is in the room.
- Offer a choice of credentials to guests: from the JustIN Mobile Key smartphone app option to SALTO's wide range of robust and waterproof cards, fobs, and bracelets which are compatible with the latest ID technologies.

https://www.beveridges.co.nz/architectural-hardware-wellington/SALTO-for-Hospitality-c22943076.

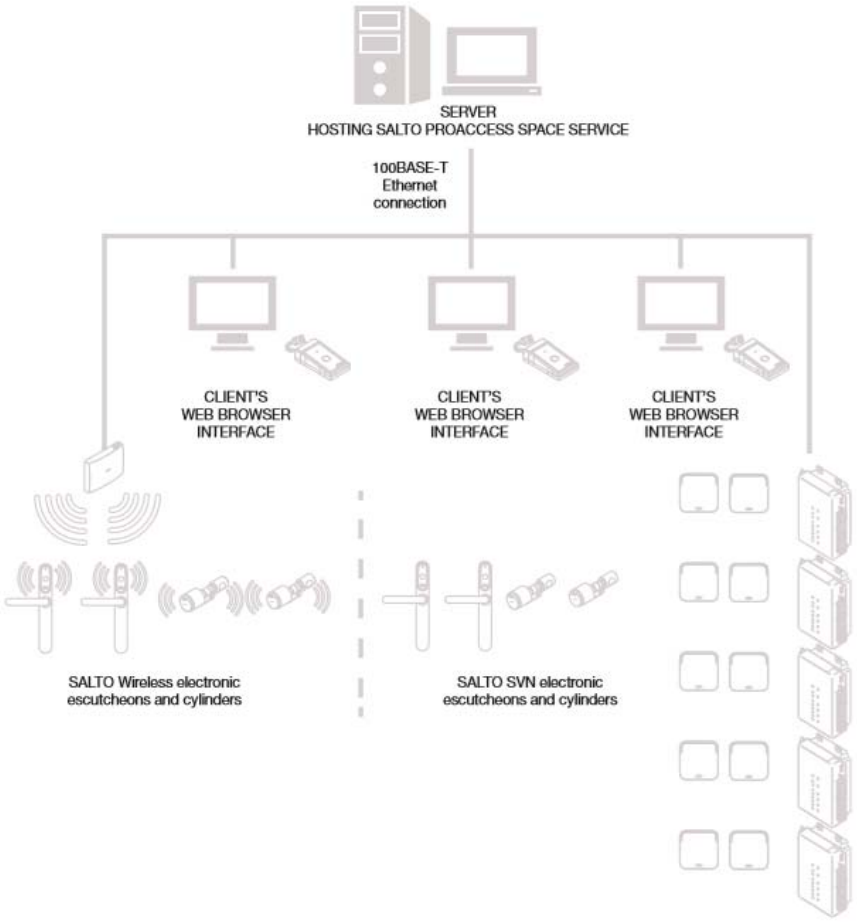
The SALTO Virtual Network (SVN) provides the flexibility for an access control system to grow from a small number of doors and users to a large number of doors and users as required. It allows stand-alone locks to read, receive and write information via an encrypted and secure data-on-card system that utilizes the capabilities of RFID read/write technology. In SVN all access data is stored on and distributed by its operating smartcard. When presenting a smartcard to an offline stand-alone door, not only does this control access rights to that door but thanks to two-way communication, the door also writes data like blacklist information or battery status back to the smartcard. The smartcard then transmits this information back to the server via online wall readers that are able to update and receive information from the cards anytime and anywhere in the building.



https://www.saltosystems.com/en-us/product-range/explanation/104/salto-virtual-network-svn/. A plurality of Salto detectors which each have a detector ID are installed in the hotel. The detectors are operable to detect the tag ID via transmittance from the tag IC.



Id.



Datasheet at p.5.

Online monitoring

SALTO Pro Access enables you to monitor in real-time not just battery status or if an update is needed, but also who accessed what door and when, if a door has been left open, intrusions etc. Total control, all in real-time.
Feature included in: SPABASIC, SPAONLINE, SPAIDSYS and SPAPART packages

Id. at p. 3. ProAccess is operable to record the pair of the tag ID and detector ID and the time at which the detector has detected the tag ID. *Id.* ProAccess includes a recording means for managing the positional information of the user based on the pair and the time. For example, ProAccess includes the "Privacy mode" feature which records when a user is in a room.

The SALTO Virtual Network (SVN) provides the flexibility for an access control system to grow from a small number of doors and users to a large number of doors and users as required. It allows stand-alone locks to read, receive and write information via an encrypted and secure data-on-card system that utilizes the capabilities of RFID read/write technology. In SVN all access data is stored on and distributed by its operating smartcard. When presenting a smartcard to an offline stand-alone door, not only does this control access rights to that door but thanks to two-way communication, the door also writes data like blacklist information or battery status back to the server via online wall readers that are able to update and receive information from the cards anytime and anywhere in the building.

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- Offer a choice of credentials to guests: from the JustIN Mobile Key smartphone app option to SALTO's wide range of robust and waterproof cards, fobs, and bracelets which are compatible with the latest ID technologies.

https://www.saltosystems.com/en-us/customer-solutions/hospitality/country/us/.

19. Positiontech is entitled to recover from Defendants the damages sustained by Positiontech as a result of Defendants' infringement of the '317 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.

JURY DEMAND

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

PRAYER FOR RELIEF

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

A. An adjudication that Defendants have infringed the '384 and '317 patents;

B. An award of damages to be paid by Defendants adequate to compensate Positiontech for Defendants' past infringement of the '384 and '317 patents and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

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

D. An award to Positiontech of such further relief at law or in equity as the Court deems just and proper.

Dated: January 22, 2019

/s/ Jacqueline K. Burt

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