UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

TRAXCELL TECHNOLOGIES, LLC.,	)	
Plaintiff,	)	
	)	Civil Action No. 2:17-cv-00042
v.	)	(Lead Case)
	)	
	)	
HUAWEI TECHNOLOGIES USA INC.,	)	JURY TRIAL DEMANDED
Defendant.	)	
	)	
_____	)_____	
TRAXCELL TECHNOLOGIES, LLC.,	)	
Plaintiff,	)	
	)	Civil Action No. 2:17-cv-00044
v.	)	(Consolidated Lead Case)
	)	
NOKIA SOLUTIONS AND	)	JURY TRIAL DEMANDED
NETWORKS OY ET AL.,	)	
Defendants.	)	

PLAINTIFF'S CORRECTED FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Traxcell Technologies, LLC. ("Traxcell") files this First Corrected[1] Amended Complaint

and demand for jury trial seeking relief from patent infringement by Nokia Solutions and Networks

US LLC ("Nokia Networks") and Nokia Solutions and Networks Oy ("Nokia Finland")

(collectively "Nokia"), 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.

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[1] The United States Patent and Trademark Office issues a Certificate of Correction for U.S. Patent 8,977,284. This corrected first amended complain adds the certificate of correction to the patent. No other change is made to the First Amended Complaint.

2.   Nokia Networks is a limited liability company organized and existing under the laws of Delaware, with a principal places of business located at (1) 6000 Connection Drive, MD E4-400, Irving, TX 75039; (2) 601 Data Dr., Plano, TX 75075; and, (3) 2400 Dallas Pkwy., Plano, TX 75093, and a registered agent for service of process at National Registered Agents, Inc, 16055 Space Center, Suite 235, Houston, TX 77062. On information and belief, Nokia Networks 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.

3.   Nokia Finland is a corporation organized and existing under the laws of Finland, with a principal place of business 6000 Connection Drive, MD E4-400, Irving, TX 75039 and a registered agent for service of process at National Registered Agents, Inc, 16055 Space Center, Suite 235, Houston, TX 77062. On information and belief, Nokia 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

4.   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).

5.   This Court has personal jurisdiction over Defendant Nokia Networks because it is present within or has minimum contacts within the State of Texas and this judicial district, including Nokia has an office at 601 Data Drive, Plano, Texas 75075; at 12515 Research Blvd, Building 5, Austin, TX 78759-2247; and at 2400 Dallas Pkwy., Plano, TX 75093; 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.

6.   Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c) and 1400(b).   On

information and belief, Defendant Nokia Networks 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.

7.   This Court has personal jurisdiction over Defendant Nokia Finland as it is present within

or has minimum contacts within the State of Texas and this judicial district, including Nokia has

an office at 601 Data Drive, Plano, Texas 75075; at 12515 Research Blvd, Building 5, Austin, TX

78759-2247; and at 2400 Dallas Pkwy., Plano, TX 75093; 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.

8.   Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c) and 1400(b).   On

information and belief, Defendant Nokia Finland 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))

9.   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.

10. 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."

11. Nokia 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 Nokia infringes claims 1, 6, 11, and 17 of the '320 patent, literally or under the doctrine of equivalents. Some examples of the wireless-network components are Control systems such as 1850 Transport service switch; 5520 Access management system; 7302 Intelligent service access manager; ISAM systems; AAA; Access controller; Access Network Analytics; Automated Operations and recovery; Directory server; Home analytics; Motive network traffic management; Network analyzer Fiber; Network analyzer Copper; Network services platform - NFM-T; Rapport PSTN gateway; Service management platform; Session boarder controller; Smart Plan builder; Agile optical network and microwave packet radio for highways; 7450 ethernet service switch; 7750 service router; 7850 virtualized services gateway;

9471 wireless mobility manager; Cloud mobile gateway; Cloud mobility manager; Nuage networks virtualized network services; Nuage networks virtualized services platform; VitalSuite networks; 7750 service router - mobile gateway; 9471 wireless mobility manager; 9771 wireless cloud element radio network controller; 9772 Wi-Fi service controller L; 9961 Multi-standard home cell; Airscale networks; CEM on demand; Connected UAV's; Flexi lite base station; Flexi multiradio 10 base stations; Flexi zone; GSM radio access networks; LTE networks; Multicontroller platform; Single RAN advanced; TD-LTE; Vehicle-to-Everything communication; Wireless network guardian; Zero emission; 1390 network planning tool; 1620 softnode; 1830 photonic service switches; 1830 security management server; 7210 service access switch; 7705 service aggregation router; 7950 extensible routing system; 9500 microwave radio pack; Dynamic diameter engine; Dynamic services controller; Network performance optimizer; Revenue management; Service router operating system; Virtualized service router; 1830 photonic service interconnect; 7250 interconnect router R6; 8950 Multi-media integration gateway; Femtocell networks; LTE-based CBRS; Multefire; Nokia gainspeed access controller; Small cell care; Subscriber data management; Telecom application server; Velocix personalization platform; VirtualQIP networks; Wavence; 4G LTE for airports; Airscale cloud RAN; Capacity and connectivity for operators; Carrier Wi-Fi; Cloudband; Community broadband; Customer experience for cable operators; NetAct; OSS; Optical networking; Smart Wi-Fi; Services-hetnets; 1830 Photonic Service Demarcation; WCDMA/HSPA; Radio-access; Centralized RAN; Telco Cloud; Services for 5G; 5G Versatile Radio; Telecom Analytics; Customer Experience Management; Wireless Network Guardian; SurePay; Service Quality Manager; Motive Connected Device Platform; Service Management Platform; Mobile Care; ONT Easy Start; Home and Access Analytics; Care Analytics; Customer Care Solutions; AirFrame Data Center Solution; Flexi CMD;

IP Multimedia Subsystem (IMS) Core products; Rich Communication Suite (RCS); Voice over LTE (VoLTE); Cloud Packet Core; Network Functions Virtualization (NFV); Software-Defined Networking (SDN); Network services platform; IP Edge Routing; Multi-access Edge Computing (MEC); CloudBand Ecosystem; IP Mobile Anyhaul; Fixed networks for mobile transport; Universal next-generation PON; Proactive Care; Service Operations and Management; Mobile Transport; IP Routing; IP/optical integration; IP Core Routing; Session Border Controller; Home Subscriber Server (HSS); Shared Data Layer; Network Planning and Optimization; 3D Geolocation planning and optimization; Preventive Complaint Analysis; Nokia AVA cognitive services platform; NPO Transformation; IMPACT IoT platform; Worldwide IoT network grid as a service (WING); IoT Readiness Services; IMPACT IoT platform; XaaS - Everything as a service; CFX-5000 SIP session control; Wavelength Routing; Metro Optical Transport Platforms; PSE-2 Super Coherent Technology; 1830 Versatile WDM Module; Integrated Packet Transport; Submarine Terrestrial Integration; Network Analyzer – Fiber; 5G Acceleration Services; Eden-NET; Evolved Service Operations Center (eSOC); Energy solutions; Field Area Network for Power Utilities; Rural broadband; 7330 ISAM FTTN (ANSI); 7330 ISAM FTTN (ETSI); Smart Grid Communications; Nokia 7750 SR-e; Nokia 7750 SR-a; Fiber – FTTH; Gigabit Smart Build; Multi-purpose Intuitive Knowledge Assistant (MIKA); Predictive Optimization; Dynamic Diameter Engine (DDE); Access Multiplexer Products; Access Provisioning Center and Products; 1663 Add Drop Multiplexer-Universal; CBX 500® Multiservice WAN Switch; CFX-5000 SIP session control; 8965 Charging Gateway; Circuit Switched Core; 9125 Compact Transcoder; Connected UAVs; 1300 Convergent Network Management Center; 1300 Cross-Domain Management Center; Data Multiplexer Products; Enterprise Communications at Network; Edge Multiplexer Products; 5020 Element Manager; 8608 Enhanced Assisted-GPS Server; 9926

eNodeB; Fiber Optical Line Systems; Flexi Network Products; GX 550 Multiservice WAN Switch; 8915 Generic SNMP Element Manager; Instant Convergent Charging Suite; 1340 Integrated Network Controller; 1100 Intelligent Test Environment (ITE); 5529 Inventory Data Manager; 7353 ISAM CX; 7362 ISAM DF-16GW; 8970 Law Enforcement & Security Support; 1621 Link Extender; Media Gateway Products; Media Resource Function; Messaging Application Broker; Motive Care Analytics; Motive Machine-to-Machine Communications Controller; Motive Network Trouble Patterning; 8950 Multi-Media Integration Gateway; 1000 Multiservice Multimedia (MM) E10 NGS; 1390 Network Planning Tool; 8917 No7 Central Surveillance System N7CSS; Nokia Gainspeed Products; One-NDS for subscriber data management; 1310 Operations and Maintenance Console – Plus; 5529 OSS Alarm Dispatcher; PacketStar® PSAX 1250 Multiservice Media Gateway; Breakthrough 400G network processor; Nokia 7705 Products; 1671 Service Connect; Service Continuity Gateway; 1830 Security Management Server; 1000 S12 Switch; Nokia 1000 S12 Remote Assistant; 1000 S12 Disaster Recovery Application; 5074 Signaling Defense System, directly or contributorily infringe when used with

a WCD or handset such as Nokia name branded phones (any model); Lumia phones; Nokia Portable Wireless Charging Plate; Wireless charging flip shell; Nokia-Asha phones; Nokia Speakerphone; 5900 Personalized Ring Back Tone; 1000 S12 AMADEUS Pro Application; Session Manager; Motive Self-Service App; MulteFire; Nokia E50; Small cells; and/or the like when using

a transceiver with an antennae, such as AirScale Active Antennas; 4.9G Massive MIMO; Digital Antenna System Radio Frequency Module and

a second computer coupled to the first computer with an access flag such as 5735 Service Management Center; Service Management Platform; 9961 Multi-Standard Home Cell; Withings

Go (Activity & sleep tracking); Flexible Routing and Charging; Dynamic Mailbox Allocator; Services - The Expert Advantage; 5900 OSS-BSS Interface; and/or Converged Messaging System, 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.

12. Nokia has and continues to induce infringement. Nokia 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., Control systems such as 1850 Transport service switch; 5520 Access management system; 7302 Intelligent service access manager; ISAM systems; AAA; Access controller; Access Network Analytics; Automated Operations and recovery; Directory server; Home analytics; Motive network traffic management; Network analyzer Fiber; Network analyzer Copper; Network services platform - NFM-T; Rapport PSTN gateway; Service management platform; Session boarder controller; Smart Plan builder; Agile optical network and microwave packet radio for highways; 7450 ethernet service switch; 7750 service router; 7850 virtualized services gateway; 9471 wireless mobility manager; Cloud mobile gateway; Cloud mobility manager; Nuage networks virtualized network services; Nuage networks virtualized services platform; VitalSuite networks; 7750 service router - mobile gateway; 9471 wireless mobility manager; 9771 wireless cloud element radio network controller; 9772 Wi-Fi service controller L; 9961 Multi-standard home cell; Airscale networks; CEM on demand; Connected UAV's; Flexi lite base station; Flexi multiradio 10 base stations; Flexi zone; GSM radio

access networks; LTE networks; Multicontroller platform; Single RAN advanced; TD-LTE; Vehicle-to-Everything communication; Wireless network guardian; Zero emission; 1390 network planning tool; 1620 softnode; 1830 photonic service switches; 1830 security management server; 7210 service access switch; 7705 service aggregation router; 7950 extensible routing system; 9500 microwave radio pack; Dynamic diameter engine; Dynamic services controller; Network performance optimizer; Revenue management; Service router operating system; Virtualized service router; 1830 photonic service interconnect; 7250 interconnect router R6; 8950 Multi-media integration gateway; Femtocell networks; LTE-based CBRS; Multefire; Nokia gainspeed access controller; Small cell care; Subscriber data management; Telecom application server; Velocix personalization platform; VirtualQIP networks; Wavence; 4G LTE for airports; Airscale cloud RAN; Capacity and connectivity for operators; Carrier Wi-Fi; Cloudband; Community broadband; Customer experience for cable operators; NetAct; OSS; Optical networking; Smart Wi-Fi; Services-hetnets; 1830 Photonic Service Demarcation; WCDMA/HSPA; Radio-access; Centralized RAN; Telco Cloud; Services for 5G; 5G Versatile Radio; Telecom Analytics; Customer Experience Management; Wireless Network Guardian; SurePay; Service Quality Manager; Motive Connected Device Platform; Service Management Platform; Mobile Care; ONT Easy Start; Home and Access Analytics; Care Analytics; Customer Care Solutions; AirFrame Data Center Solution; Flexi CMD; IP Multimedia Subsystem (IMS) Core products; Rich Communication Suite (RCS); Voice over LTE (VoLTE); Cloud Packet Core; Network Functions Virtualization (NFV); Software-Defined Networking (SDN); Network services platform; IP Edge Routing; Multi-access Edge Computing (MEC); CloudBand Ecosystem; IP Mobile Anyhaul; Fixed networks for mobile transport; Universal next-generation PON; Proactive Care; Service Operations and Management; Mobile Transport; IP Routing; IP/optical integration; IP Core

Routing; Session Border Controller; Home Subscriber Server (HSS); Shared Data Layer; Network Planning and Optimization; 3D Geolocation planning and optimization; Preventive Complaint Analysis; Nokia AVA cognitive services platform; NPO Transformation; IMPACT IoT platform; Worldwide IoT network grid as a service (WING); IoT Readiness Services; IMPACT IoT platform; XaaS - Everything as a service; CFX-5000 SIP session control; Wavelength Routing; Metro Optical Transport Platforms; PSE-2 Super Coherent Technology; 1830 Versatile WDM Module; Integrated Packet Transport; Submarine Terrestrial Integration; Network Analyzer – Fiber; 5G Acceleration Services; Eden-NET; Evolved Service Operations Center (eSOC); Energy solutions; Field Area Network for Power Utilities; Rural broadband; 7330 ISAM FTTN (ANSI); 7330 ISAM FTTN (ETSI); Smart Grid Communications; Nokia 7750 SR-e; Nokia 7750 SR-a; Fiber – FTTH; Gigabit Smart Build; Multi-purpose Intuitive Knowledge Assistant (MIKA); Predictive Optimization; Dynamic Diameter Engine (DDE); Access Multiplexer Products; Access Provisioning Center and Products; 1663 Add Drop Multiplexer-Universal; CBX 500® Multiservice WAN Switch; CFX-5000 SIP session control; 8965 Charging Gateway; Circuit Switched Core; 9125 Compact Transcoder; Connected UAVs; 1300 Convergent Network Management Center; 1300 Cross-Domain Management Center; Data Multiplexer Products; Enterprise Communications at Network; Edge Multiplexer Products; 5020 Element Manager; 8608 Enhanced Assisted-GPS Server; 9926 eNodeB; Fiber Optical Line Systems; Flexi Network Products; GX 550 Multiservice WAN Switch; 8915 Generic SNMP Element Manager; Instant Convergent Charging Suite; 1340 Integrated Network Controller; 1100 Intelligent Test Environment (ITE); 5529 Inventory Data Manager; 7353 ISAM CX; 7362 ISAM DF-16GW; 8970 Law Enforcement & Security Support; 1621 Link Extender; Media Gateway Products; Media Resource Function; Messaging Application Broker; Motive Care Analytics; Motive Machine-to-

Machine Communications Controller; Motive Network Trouble Patterning; 8950 Multi-Media Integration Gateway; 1000 Multiservice Multimedia (MM) E10 NGS; 1390 Network Planning Tool; 8917 No7 Central Surveillance System N7CSS; Nokia Gainspeed Products; One-NDS for subscriber data management; 1310 Operations and Maintenance Console – Plus; 5529 OSS Alarm Dispatcher; PacketStar® PSAX 1250 Multiservice Media Gateway; Breakthrough 400G network processor; Nokia 7705 Products; 1671 Service Connect; Service Continuity Gateway; 1830 Security Management Server; 1000 S12 Switch; Nokia 1000 S12 Remote Assistant; 1000 S12 Disaster Recovery Application; 5074 Signaling Defense System, directly or contributorily infringe when used with

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a transceiver with an antennae, such as AirScale Active Antennas; 4.9G Massive MIMO; Digital Antenna System Radio Frequency Module and

a second computer coupled to the first computer with an access flag such as 5735 Service Management Center; Service Management Platform; 9961 Multi-Standard Home Cell; Withings Go (Activity & sleep tracking); Flexible Routing and Charging; Dynamic Mailbox Allocator; Services - The Expert Advantage; 5900 OSS-BSS Interface; and/or Converged Messaging System, central SDM database, 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. Moreover, Nokia has known of the '320 patent, by at least by the date Nokia is

served with this Complaint, if not as early as 2007 when Traxcell was appointed as a supplier to

Nokia, such that it knew and should have known that it was and would be inducing infringement;

it has induced infringement post-suit filing. There are seven patent references to the application

that matured into this patent, the most recent on September 25, 2015.

13.   Nokia 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))[2]

14. 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.

15. 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."

16. Nokia 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 Nokia infringes one or more claims of the '284 patent,

including—for example—Claims 1 and 12, literally or under the doctrine of equivalents. Some

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[2] Now with Certificate of Correction amending Claim 1 at issue in this case. Claim 2, also amended, is not at issue in this case.

examples of the wireless-network components are Control systems such as 1850 Transport service switch; 5520 Access management system; 7302 Intelligent service access manager; ISAM systems; AAA; Access controller; Access Network Analytics; Automated Operations and recovery; Directory server; Home analytics; Motive network traffic management; Network analyzer Fiber; Network analyzer Copper; Network services platform - NFM-T; Rapport PSTN gateway; Service management platform; Session boarder controller; Smart Plan builder; Agile optical network and microwave packet radio for highways; 7450 ethernet service switch; 7750 service router; 7850 virtualized services gateway; 9471 wireless mobility manager; Cloud mobile gateway; Cloud mobility manager; Nuage networks virtualized network services; Nuage networks virtualized services platform; VitalSuite networks; 7750 service router - mobile gateway; 9471 wireless mobility manager; 9771 wireless cloud element radio network controller; 9772 Wi-Fi service controller L; 9961 Multi-standard home cell; Airscale networks; CEM on demand; Connected UAV's; Flexi lite base station; Flexi multiradio 10 base stations; Flexi zone; GSM radio access networks; LTE networks; Multicontroller platform; Single RAN advanced; TD-LTE; Vehicle-to-Everything communication; Wireless network guardian; Zero emission; 1390 network planning tool; 1620 softnode; 1830 photonic service switches; 1830 security management server; 7210 service access switch; 7705 service aggregation router; 7950 extensible routing system; 9500 microwave radio pack; Dynamic diameter engine; Dynamic services controller; Network performance optimizer; Revenue management; Service router operating system; Virtualized service router; 1830 photonic service interconnect; 7250 interconnect router R6; 8950 Multi-media integration gateway; Femtocell networks; LTE-based CBRS; Multefire; Nokia gainspeed access controller; Small cell care; Subscriber data management; Telecom application server; Velocix personalization platform; VirtualQIP networks; Wavence; 4G LTE for airports; Airscale cloud

RAN; Capacity and connectivity for operators; Carrier Wi-Fi; Cloudband; Community broadband; Customer experience for cable operators; NetAct; OSS; Optical networking; Smart Wi-Fi; Services-hetnets; 1830 Photonic Service Demarcation; WCDMA/HSPA; Radio-access; Centralized RAN; Telco Cloud; Services for 5G; 5G Versatile Radio; Telecom Analytics; Customer Experience Management; Wireless Network Guardian; SurePay; Service Quality Manager; Motive Connected Device Platform; Service Management Platform; Mobile Care; ONT Easy Start; Home and Access Analytics; Care Analytics; Customer Care Solutions; AirFrame Data Center Solution; Flexi CMD; IP Multimedia Subsystem (IMS) Core products; Rich Communication Suite (RCS); Voice over LTE (VoLTE); Cloud Packet Core; Network Functions Virtualization (NFV); Software-Defined Networking (SDN); Network services platform; IP Edge Routing; Multi-access Edge Computing (MEC); CloudBand Ecosystem; IP Mobile Anyhaul; Fixed networks for mobile transport; Universal next-generation PON; Proactive Care; Service Operations and Management; Mobile Transport; IP Routing; IP/optical integration; IP Core Routing; Session Border Controller; Home Subscriber Server (HSS); Shared Data Layer; Network Planning and Optimization; 3D Geolocation planning and optimization; Preventive Complaint Analysis; Nokia AVA cognitive services platform; NPO Transformation; IMPACT IoT platform; Worldwide IoT network grid as a service (WING); IoT Readiness Services; IMPACT IoT platform; XaaS - Everything as a service; CFX-5000 SIP session control; Wavelength Routing; Metro Optical Transport Platforms; PSE-2 Super Coherent Technology; 1830 Versatile WDM Module; Integrated Packet Transport; Submarine Terrestrial Integration; Network Analyzer – Fiber; 5G Acceleration Services; Eden-NET; Evolved Service Operations Center (eSOC); Energy solutions; Field Area Network for Power Utilities; Rural broadband; 7330 ISAM FTTN (ANSI); 7330 ISAM FTTN (ETSI); Smart Grid Communications; Nokia 7750 SR-e; Nokia 7750 SR-a;

Fiber – FTTH; Gigabit Smart Build; Multi-purpose Intuitive Knowledge Assistant (MIKA); Predictive Optimization; Dynamic Diameter Engine (DDE); Access Multiplexer Products; Access Provisioning Center and Products; 1663 Add Drop Multiplexer-Universal; CBX 500® Multiservice WAN Switch; CFX-5000 SIP session control; 8965 Charging Gateway; Circuit Switched Core; 9125 Compact Transcoder; Connected UAVs; 1300 Convergent Network Management Center; 1300 Cross-Domain Management Center; Data Multiplexer Products; Enterprise Communications at Network; Edge Multiplexer Products; 5020 Element Manager; 8608 Enhanced Assisted-GPS Server; 9926 eNodeB; Fiber Optical Line Systems; Flexi Network Products; GX 550 Multiservice WAN Switch; 8915 Generic SNMP Element Manager; Instant Convergent Charging Suite; 1340 Integrated Network Controller; 1100 Intelligent Test Environment (ITE); 5529 Inventory Data Manager; 7353 ISAM CX; 7362 ISAM DF-16GW; 8970 Law Enforcement & Security Support; 1621 Link Extender; Media Gateway Products; Media Resource Function; Messaging Application Broker; Motive Care Analytics; Motive Machine-to-Machine Communications Controller; Motive Network Trouble Patterning; 8950 Multi-Media Integration Gateway; 1000 Multiservice Multimedia (MM) E10 NGS; 1390 Network Planning Tool; 8917 No7 Central Surveillance System N7CSS; Nokia Gainspeed Products; One-NDS for subscriber data management; 1310 Operations and Maintenance Console – Plus; 5529 OSS Alarm Dispatcher; PacketStar® PSAX 1250 Multiservice Media Gateway; Breakthrough 400G network processor; Nokia 7705 Products; 1671 Service Connect; Service Continuity Gateway; 1830 Security Management Server; 1000 S12 Switch; Nokia 1000 S12 Remote Assistant; 1000 S12 Disaster Recovery Application; 5074 Signaling Defense System, directly or contributorily infringe when used with

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a transceiver with an antennae, such as AirScale Active Antennas; 4.9G Massive MIMO; Digital Antenna System Radio Frequency Module and

a second computer coupled to the first computer with an access flag such as 5735 Service Management Center; Service Management Platform; 9961 Multi-Standard Home Cell; Withings Go (Activity & sleep tracking); Flexible Routing and Charging; Dynamic Mailbox Allocator; Services - The Expert Advantage; 5900 OSS-BSS Interface; and/or Converged Messaging System, 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.

17. Nokia has and continues to induce infringement. Nokia 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., Control systems such as 1850 Transport service switch; 5520 Access management system; 7302 Intelligent service access manager; ISAM systems; AAA; Access controller; Access Network Analytics; Automated Operations and recovery; Directory server; Home analytics; Motive network traffic management;

Network analyzer Fiber; Network analyzer Copper; Network services platform - NFM-T; Rapport

PSTN gateway; Service management platform; Session boarder controller; Smart Plan builder;

Agile optical network and microwave packet radio for highways; 7450 ethernet service switch;

7750 service router; 7850 virtualized services gateway; 9471 wireless mobility manager; Cloud

mobile gateway; Cloud mobility manager; Nuage networks virtualized network services; Nuage

networks virtualized services platform; VitalSuite networks; 7750 service router - mobile gateway;

9471 wireless mobility manager; 9771 wireless cloud element radio network controller; 9772 Wi-

Fi service controller L; 9961 Multi-standard home cell; Airscale networks; CEM on demand;

Connected UAV's; Flexi lite base station; Flexi multiradio 10 base stations; Flexi zone; GSM radio

access networks; LTE networks; Multicontroller platform; Single RAN advanced; TD-LTE;

Vehicle-to-Everything communication; Wireless network guardian; Zero emission; 1390 network

planning tool; 1620 softnode; 1830 photonic service switches; 1830 security management server;

7210 service access switch; 7705 service aggregation router; 7950 extensible routing system; 9500

microwave radio pack; Dynamic diameter engine; Dynamic services controller; Network

performance optimizer; Revenue management; Service router operating system; Virtualized

service router; 1830 photonic service interconnect; 7250 interconnect router R6; 8950 Multi-media

integration gateway; Femtocell networks; LTE-based CBRS; Multefire; Nokia gainspeed access

controller; Small cell care; Subscriber data management; Telecom application server; Velocix

personalization platform; VirtualQIP networks; Wavence; 4G LTE for airports; Airscale cloud

RAN; Capacity and connectivity for operators; Carrier Wi-Fi; Cloudband; Community broadband;

Customer experience for cable operators; NetAct; OSS; Optical networking; Smart Wi-Fi;

Services-hetnets; 1830 Photonic Service Demarcation; WCDMA/HSPA; Radio-access;

Centralized RAN; Telco Cloud; Services for 5G; 5G Versatile Radio; Telecom Analytics;

Customer Experience Management; Wireless Network Guardian; SurePay; Service Quality Manager; Motive Connected Device Platform; Service Management Platform; Mobile Care; ONT Easy Start; Home and Access Analytics; Care Analytics; Customer Care Solutions; AirFrame Data Center Solution; Flexi CMD; IP Multimedia Subsystem (IMS) Core products; Rich Communication Suite (RCS); Voice over LTE (VoLTE); Cloud Packet Core; Network Functions Virtualization (NFV); Software-Defined Networking (SDN); Network services platform; IP Edge Routing; Multi-access Edge Computing (MEC); CloudBand Ecosystem; IP Mobile Anyhaul; Fixed networks for mobile transport; Universal next-generation PON; Proactive Care; Service Operations and Management; Mobile Transport; IP Routing; IP/optical integration; IP Core Routing; Session Border Controller; Home Subscriber Server (HSS); Shared Data Layer; Network Planning and Optimization; 3D Geolocation planning and optimization; Preventive Complaint Analysis; Nokia AVA cognitive services platform; NPO Transformation; IMPACT IoT platform; Worldwide IoT network grid as a service (WING); IoT Readiness Services; IMPACT IoT platform; XaaS - Everything as a service; CFX-5000 SIP session control; Wavelength Routing; Metro Optical Transport Platforms; PSE-2 Super Coherent Technology; 1830 Versatile WDM Module; Integrated Packet Transport; Submarine Terrestrial Integration; Network Analyzer – Fiber; 5G Acceleration Services; Eden-NET; Evolved Service Operations Center (eSOC); Energy solutions; Field Area Network for Power Utilities; Rural broadband; 7330 ISAM FTTN (ANSI); 7330 ISAM FTTN (ETSI); Smart Grid Communications; Nokia 7750 SR-e; Nokia 7750 SR-a; Fiber – FTTH; Gigabit Smart Build; Multi-purpose Intuitive Knowledge Assistant (MIKA); Predictive Optimization; Dynamic Diameter Engine (DDE); Access Multiplexer Products; Access Provisioning Center and Products; 1663 Add Drop Multiplexer-Universal; CBX 500® Multiservice WAN Switch; CFX-5000 SIP session control; 8965 Charging Gateway; Circuit

Switched Core; 9125 Compact Transcoder; Connected UAVs; 1300 Convergent Network Management Center; 1300 Cross-Domain Management Center; Data Multiplexer Products; Enterprise Communications at Network; Edge Multiplexer Products; 5020 Element Manager; 8608 Enhanced Assisted-GPS Server; 9926 eNodeB; Fiber Optical Line Systems; Flexi Network Products; GX 550 Multiservice WAN Switch; 8915 Generic SNMP Element Manager; Instant Convergent Charging Suite; 1340 Integrated Network Controller; 1100 Intelligent Test Environment (ITE); 5529 Inventory Data Manager; 7353 ISAM CX; 7362 ISAM DF-16GW; 8970 Law Enforcement & Security Support; 1621 Link Extender; Media Gateway Products; Media Resource Function; Messaging Application Broker; Motive Care Analytics; Motive Machine-to-Machine Communications Controller; Motive Network Trouble Patterning; 8950 Multi-Media Integration Gateway; 1000 Multiservice Multimedia (MM) E10 NGS; 1390 Network Planning Tool; 8917 No7 Central Surveillance System N7CSS; Nokia Gainspeed Products; One-NDS for subscriber data management; 1310 Operations and Maintenance Console – Plus; 5529 OSS Alarm Dispatcher; PacketStar® PSAX 1250 Multiservice Media Gateway; Breakthrough 400G network processor; Nokia 7705 Products; 1671 Service Connect; Service Continuity Gateway; 1830 Security Management Server; 1000 S12 Switch; Nokia 1000 S12 Remote Assistant; 1000 S12 Disaster Recovery Application; 5074 Signaling Defense System, directly or contributorily infringe when used with

a WCD or handset such as Nokia name branded phones (any model); Lumia phones; Nokia Portable Wireless Charging Plate; Wireless charging flip shell; Nokia-Asha phones; Nokia Speakerphone; 5900 Personalized Ring Back Tone; 1000 S12 AMADEUS Pro Application; Session Manager; Motive Self-Service App; MulteFire; Nokia E50; Small cells; and/or the like when using

a transceiver with an antennae, such as AirScale Active Antennas; 4.9G Massive MIMO; Digital Antenna System Radio Frequency Module and

a second computer coupled to the first computer with an access flag such as 5735 Service Management Center; Service Management Platform; 9961 Multi-Standard Home Cell; Withings Go (Activity & sleep tracking); Flexible Routing and Charging; Dynamic Mailbox Allocator; Services - The Expert Advantage; 5900 OSS-BSS Interface; and/or Converged Messaging System, 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 and 12, literally or under the doctrine of equivalents. Moreover, Nokia 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 Nokia by the U.S. Patent and Trademark Office during prosecution of one of Nokia's patent applications, if not as early as 2007 when Traxcell was appointed as a supplier to Nokia, such that Nokia knew and should have known that it was and would be inducing infringement. There are seven patent references to the application that matured into this patent, the most recent on September 25, 2015.

18.   Nokia 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))

19. 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.

20. 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."

21. Nokia 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 Nokia 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 are Control systems such as 1850 Transport service switch; 5520 Access management system; 7302 Intelligent service access manager; ISAM systems; AAA; Access controller; Access Network Analytics; Automated Operations and recovery; Directory server; Home analytics; Motive network traffic management; Network analyzer Fiber; Network analyzer Copper; Network services platform - NFM-T; Rapport PSTN gateway; Service management platform; Session boarder controller; Smart Plan builder; Agile optical network and microwave packet radio for highways; 7450 ethernet service switch; 7750 service router; 7850 virtualized services gateway; 9471 wireless mobility manager; Cloud mobile gateway; Cloud mobility manager; Nuage networks virtualized network services; Nuage networks virtualized services platform; VitalSuite networks; 7750 service router - mobile gateway; 9471 wireless mobility manager; 9771 wireless cloud element radio network controller; 9772 Wi-Fi service controller L; 9961 Multi-standard home cell; Airscale networks; CEM on demand; Connected UAV's; Flexi lite base station; Flexi multiradio 10 base stations; Flexi zone; GSM radio access networks; LTE networks; Multicontroller platform; Single RAN advanced; TD-LTE;

Vehicle-to-Everything communication; Wireless network guardian; Zero emission; 1390 network planning tool; 1620 softnode; 1830 photonic service switches; 1830 security management server; 7210 service access switch; 7705 service aggregation router; 7950 extensible routing system; 9500 microwave radio pack; Dynamic diameter engine; Dynamic services controller; Network performance optimizer; Revenue management; Service router operating system; Virtualized service router; 1830 photonic service interconnect; 7250 interconnect router R6; 8950 Multi-media integration gateway; Femtocell networks; LTE-based CBRS; Multefire; Nokia gainspeed access controller; Small cell care; Subscriber data management; Telecom application server; Velocix personalization platform; VirtualQIP networks; Wavence; 4G LTE for airports; Airscale cloud RAN; Capacity and connectivity for operators; Carrier Wi-Fi; Cloudband; Community broadband; Customer experience for cable operators; NetAct; OSS; Optical networking; Smart Wi-Fi; Services-hetnets; 1830 Photonic Service Demarcation; WCDMA/HSPA; Radio-access; Centralized RAN; Telco Cloud; Services for 5G; 5G Versatile Radio; Telecom Analytics; Customer Experience Management; Wireless Network Guardian; SurePay; Service Quality Manager; Motive Connected Device Platform; Service Management Platform; Mobile Care; ONT Easy Start; Home and Access Analytics; Care Analytics; Customer Care Solutions; AirFrame Data Center Solution; Flexi CMD; IP Multimedia Subsystem (IMS) Core products; Rich Communication Suite (RCS); Voice over LTE (VoLTE); Cloud Packet Core; Network Functions Virtualization (NFV); Software-Defined Networking (SDN); Network services platform; IP Edge Routing; Multi-access Edge Computing (MEC); CloudBand Ecosystem; IP Mobile Anyhaul; Fixed networks for mobile transport; Universal next-generation PON; Proactive Care; Service Operations and Management; Mobile Transport; IP Routing; IP/optical integration; IP Core Routing; Session Border Controller; Home Subscriber Server (HSS); Shared Data Layer; Network

Planning and Optimization; 3D Geolocation planning and optimization; Preventive Complaint Analysis; Nokia AVA cognitive services platform; NPO Transformation; IMPACT IoT platform; Worldwide IoT network grid as a service (WING); IoT Readiness Services; IMPACT IoT platform; XaaS - Everything as a service; CFX-5000 SIP session control; Wavelength Routing; Metro Optical Transport Platforms; PSE-2 Super Coherent Technology; 1830 Versatile WDM Module; Integrated Packet Transport; Submarine Terrestrial Integration; Network Analyzer – Fiber; 5G Acceleration Services; Eden-NET; Evolved Service Operations Center (eSOC); Energy solutions; Field Area Network for Power Utilities; Rural broadband; 7330 ISAM FTTN (ANSI); 7330 ISAM FTTN (ETSI); Smart Grid Communications; Nokia 7750 SR-e; Nokia 7750 SR-a; Fiber – FTTH; Gigabit Smart Build; Multi-purpose Intuitive Knowledge Assistant (MIKA); Predictive Optimization; Dynamic Diameter Engine (DDE); Access Multiplexer Products; Access Provisioning Center and Products; 1663 Add Drop Multiplexer-Universal; CBX 500® Multiservice WAN Switch; CFX-5000 SIP session control; 8965 Charging Gateway; Circuit Switched Core; 9125 Compact Transcoder; Connected UAVs; 1300 Convergent Network Management Center; 1300 Cross-Domain Management Center; Data Multiplexer Products; Enterprise Communications at Network; Edge Multiplexer Products; 5020 Element Manager; 8608 Enhanced Assisted-GPS Server; 9926 eNodeB; Fiber Optical Line Systems; Flexi Network Products; GX 550 Multiservice WAN Switch; 8915 Generic SNMP Element Manager; Instant Convergent Charging Suite; 1340 Integrated Network Controller; 1100 Intelligent Test Environment (ITE); 5529 Inventory Data Manager; 7353 ISAM CX; 7362 ISAM DF-16GW; 8970 Law Enforcement & Security Support; 1621 Link Extender; Media Gateway Products; Media Resource Function; Messaging Application Broker; Motive Care Analytics; Motive Machine-to-Machine Communications Controller; Motive Network Trouble Patterning; 8950 Multi-Media

Integration Gateway; 1000 Multiservice Multimedia (MM) E10 NGS; 1390 Network Planning Tool; 8917 No7 Central Surveillance System N7CSS; Nokia Gainspeed Products; One-NDS for subscriber data management; 1310 Operations and Maintenance Console – Plus; 5529 OSS Alarm Dispatcher; PacketStar® PSAX 1250 Multiservice Media Gateway; Breakthrough 400G network processor; Nokia 7705 Products; 1671 Service Connect; Service Continuity Gateway; 1830 Security Management Server; 1000 S12 Switch; Nokia 1000 S12 Remote Assistant; 1000 S12 Disaster Recovery Application; 5074 Signaling Defense System, directly or contributorily infringe when used with

a WCD or handset such as Nokia name branded phones (any model); Lumia phones; Nokia Portable Wireless Charging Plate; Wireless charging flip shell; Nokia-Asha phones; Nokia Speakerphone; 5900 Personalized Ring Back Tone; 1000 S12 AMADEUS Pro Application; Session Manager; Motive Self-Service App; MulteFire; Nokia E50; Small cells; and/or the like when using

a transceiver with an antennae, such as AirScale Active Antennas; 4.9G Massive MIMO; Digital Antenna System Radio Frequency Module and

a second computer coupled to the first computer with an access flag such as 5735 Service Management Center; Service Management Platform; 9961 Multi-Standard Home Cell; Withings Go (Activity & sleep tracking); Flexible Routing and Charging; Dynamic Mailbox Allocator; Services - The Expert Advantage; 5900 OSS-BSS Interface; and/or Converged Messaging System, 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.

22. Nokia has and continues to induce infringement. Nokia 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., Control systems such as 1850 Transport service switch; 5520 Access management system; 7302 Intelligent service access manager; ISAM systems; AAA; Access controller; Access Network Analytics; Automated Operations and recovery; Directory server; Home analytics; Motive network traffic management; Network analyzer Fiber; Network analyzer Copper; Network services platform - NFM-T; Rapport PSTN gateway; Service management platform; Session boarder controller; Smart Plan builder; Agile optical network and microwave packet radio for highways; 7450 ethernet service switch; 7750 service router; 7850 virtualized services gateway; 9471 wireless mobility manager; Cloud mobile gateway; Cloud mobility manager; Nuage networks virtualized network services; Nuage networks virtualized services platform; VitalSuite networks; 7750 service router - mobile gateway; 9471 wireless mobility manager; 9771 wireless cloud element radio network controller; 9772 Wi-Fi service controller L; 9961 Multi-standard home cell; Airscale networks; CEM on demand; Connected UAV's; Flexi lite base station; Flexi multiradio 10 base stations; Flexi zone; GSM radio access networks; LTE networks; Multicontroller platform; Single RAN advanced; TD-LTE; Vehicle-to-Everything communication; Wireless network guardian; Zero emission; 1390 network planning tool; 1620 softnode; 1830 photonic service switches; 1830 security management server; 7210 service access switch; 7705 service aggregation router; 7950 extensible routing system; 9500 microwave radio pack; Dynamic diameter engine; Dynamic services controller; Network performance optimizer; Revenue management; Service router operating system; Virtualized

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Module; Integrated Packet Transport; Submarine Terrestrial Integration; Network Analyzer – Fiber; 5G Acceleration Services; Eden-NET; Evolved Service Operations Center (eSOC); Energy solutions; Field Area Network for Power Utilities; Rural broadband; 7330 ISAM FTTN (ANSI); 7330 ISAM FTTN (ETSI); Smart Grid Communications; Nokia 7750 SR-e; Nokia 7750 SR-a; Fiber – FTTH; Gigabit Smart Build; Multi-purpose Intuitive Knowledge Assistant (MIKA); Predictive Optimization; Dynamic Diameter Engine (DDE); Access Multiplexer Products; Access Provisioning Center and Products; 1663 Add Drop Multiplexer-Universal; CBX 500® Multiservice WAN Switch; CFX-5000 SIP session control; 8965 Charging Gateway; Circuit Switched Core; 9125 Compact Transcoder; Connected UAVs; 1300 Convergent Network Management Center; 1300 Cross-Domain Management Center; Data Multiplexer Products; Enterprise Communications at Network; Edge Multiplexer Products; 5020 Element Manager; 8608 Enhanced Assisted-GPS Server; 9926 eNodeB; Fiber Optical Line Systems; Flexi Network Products; GX 550 Multiservice WAN Switch; 8915 Generic SNMP Element Manager; Instant Convergent Charging Suite; 1340 Integrated Network Controller; 1100 Intelligent Test Environment (ITE); 5529 Inventory Data Manager; 7353 ISAM CX; 7362 ISAM DF-16GW; 8970 Law Enforcement & Security Support; 1621 Link Extender; Media Gateway Products; Media Resource Function; Messaging Application Broker; Motive Care Analytics; Motive Machine-to-Machine Communications Controller; Motive Network Trouble Patterning; 8950 Multi-Media Integration Gateway; 1000 Multiservice Multimedia (MM) E10 NGS; 1390 Network Planning Tool; 8917 No7 Central Surveillance System N7CSS; Nokia Gainspeed Products; One-NDS for subscriber data management; 1310 Operations and Maintenance Console – Plus; 5529 OSS Alarm Dispatcher; PacketStar® PSAX 1250 Multiservice Media Gateway; Breakthrough 400G network processor; Nokia 7705 Products; 1671 Service Connect; Service Continuity Gateway; 1830

Security Management Server; 1000 S12 Switch; Nokia 1000 S12 Remote Assistant; 1000 S12

Disaster Recovery Application; 5074 Signaling Defense System, directly or contributorily infringe

when used with

a WCD or handset such as Nokia name branded phones (any model); Lumia phones; Nokia

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Speakerphone; 5900 Personalized Ring Back Tone; 1000 S12 AMADEUS Pro Application;

Session Manager; Motive Self-Service App; MulteFire; Nokia E50; Small cells; and/or the like

when using

a transceiver with an antennae, such as AirScale Active Antennas; 4.9G Massive MIMO; Digital

Antenna System Radio Frequency Module and

a second computer coupled to the first computer with an access flag such as 5735 Service

Management Center; Service Management Platform; 9961 Multi-Standard Home Cell; Withings

Go (Activity & sleep tracking); Flexible Routing and Charging; Dynamic Mailbox Allocator;

Services - The Expert Advantage; 5900 OSS-BSS Interface; and/or Converged Messaging System,

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 and 12,

literally or under the doctrine of equivalents. Moreover, Nokia 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 Nokia by the U.S. Patent and

Trademark Office during prosecution of one of Nokia's patent applications, if not as early as 2007

when Traxcell was appointed as a supplier to Nokia, such that Nokia knew and should have known

that it was and would be inducing infringement.   There are seven patent references to the application that matured into this patent, the most recent on September 25, 2015.

23.   Nokia 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 Nokia Corp. dba Nokia has infringed the '284, '320, and '024 patents;

ii.   award Traxcell damages in an amount sufficient to compensate it for Nokia' infringement of the '284, '320, and '024 patents, 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; and

v.   award Traxcell such other and further relief as this Court deems just and proper.

JURY DEMAND

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

Respectfully submitted,

Ramey & Schwaller, LLP

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Attorneys for Traxcell

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 13, 2019, with a copy of the foregoing via the Court's CM/ECF system.

/s/ William P. Ramey, III
William P. Ramey, III