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**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

HAILO TECHNOLOGIES, LLC,

Plaintiff,

v.

MOOVN TECHNOLOGIES, LLC,

Defendant.

Case No.

Complaint – Patent Infringement

JURY TRIAL DEMANDED

COMPLAINT FOR INFRINGEMENT OF U.S. PATENT NO. 6,756,913

Plaintiff Hailo Technologies, LLC (“Plaintiff”), by and through its undersigned counsel, for its complaint for patent infringement against Moovn Technologies, LLC (“Defendant”), makes the following allegations. These allegations are made upon information and belief.

NATURE OF THE ACTION

1. This is an action against Defendant for infringement of one or more claims of United States Patent No. 6,407,698 ("the ‘698 Patent").

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2 **THE PARTIES**

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4 2. Plaintiff is a limited liability company organized under the laws of the state of
5 California and has an office and principal place of business at California limited
6 liability company with its principal office located in California, at 35 Hugus Alley,
7 Suite 210, Pasadena, CA 91103.
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9 3. Defendant Moovn Technologies, LLC is organized under the laws of
10 Washington State having a principal place of business at 1122 East Pike Street, #1315,
11 Seattle, Washington, 98122-3916. Moovn may be served via its registered agent,
12 Gabriel Godwin, 1222 E. Pike Street, #1315, Seattle, WA 98122-3916.
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14 **JURISDICTION AND VENUE**

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16 5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.
17 §§ 1331 and 1338(a).

18 6. This Court has personal jurisdiction over the Defendant because, *inter alia*, it
19 regularly conducts business in the state of Washington, and continues to commit acts
20 of patent infringement in the state of Washington including by making, using, offering
21 to sell, and/or selling, and/or importing, software applications including without
22 limitation, the Moovn software application, which infringes at least one claim of the
23 ‘913 Patent (hereinafter “Accused Products”), over the internet throughout the United
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2 States, including sales targeted at the state of Washington, thereby purposefully
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4 availing itself of the benefits of the state.

5 7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c) and
6
7 1400(b).

8 **FACTUAL BACKGROUND**
9 **THE ‘913 PATENT**

10 8. Plaintiff is the owner, by assignment, of the ‘913 Patent”, entitled “System for
11
12 Automatically Dispatching Taxis to Client Locations,” which was duly and legally
13 issued on June 29th, 2004 by the United States Patent and Trademark Office
14 (“USPTO”). A copy of the ‘913 Patent is attached to this Complaint as **Exhibit A.**

15 **THE ACCUSED PRODUCTS**

16 9. Defendant markets an Accused Product known as the Moovn software
17
18 application. A claim chart for the Accused Product is attached as **Exhibit B.**

19 **COUNT I: CLAIM FOR PATENT INFRINGEMENT**
20 **UNDER 35 U.S.C. § 271(b)**

21 10. Plaintiff hereby incorporates by reference the allegations of paragraphs 1
22
23 through 9 of this Complaint as if fully set forth herein.

24 11. All of the claims of the ‘913 Patent are valid and enforceable.

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2 12. Defendant has imported, offered to sell and provide, has sold and provided, and
3 continues to offer to sell and provide, the Accused Products in the United States and
4 in this District that literally infringes at least one claim of the '913 patent thus actively
5 inducing infringement.
6

7
8 13. Defendant has imported, offered to sell and provide, has sold and provided, and
9 continues to offer to sell and provide, the Accused Products in the United States and
10 in this District that infringes at least one claim of the '913 Patent under the doctrine of
11 equivalents thus actively inducing infringement.
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13 15. As a direct and proximate result of Defendant's infringement of the '913 Patent,
14 Plaintiff has been and will continue to be damaged in an amount yet to be determined,
15 including but not limited to Plaintiff's lost profits and/or reasonable royalties.
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17 **PRAYER FOR RELIEF**

18 WHEREFORE, Plaintiff prays for relief against Defendant as follows:
19

20 A. An award of damages in an amount to be determined at trial, but not less
21 than a reasonable royalty and/or Plaintiff's lost profits as a result of Defendant's
22 infringing actions;
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24 B. A trebling, pursuant to 35 U.S.C. § 284, of any and all damages awarded
25 for Defendant's infringement of the '913 Patent;
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- C. An award of interest and costs; and
- D. For such other and further relief, as may be just and equitable.

Dated June 20, 2019

Respectfully submitted

/s/Nicholas Ranallo
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3 **DEMAND FOR TRIAL BY JURY**

4 Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby
5 demands a jury trial on all issues and causes of action triable to a jury.
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7 Dated June 20, 2019

Respectfully submitted

8 /s/Nicholas Ranallo

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18 *Attorney for Plaintiff*

19 *Hailo Technologies, LLC*