

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEOGRAPHIC LOCATION
INNOVATIONS LLC,

Plaintiff,

vs.

MOBIKE, INC.,

Defendant.

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Case No:

PATENT CASE

COMPLAINT

Plaintiff Geographic Location Innovations LLC (“Plaintiff” or “GLI”) files this Complaint against Mobike, Inc. (“Defendant” or “Mobike”) for infringement of United States Patent No. 7,917,285 (hereinafter “the ‘285 Patent”).

PARTIES AND JURISDICTION

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

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

3. Plaintiff is a Texas limited liability company with a virtual office located at 1400 Preston Rd, Suite 400, Plano, TX 75093.

4. On information and belief, Defendant is a Delaware corporation with a place of business located at 80 M Street, SE, 1st Floor, Washington, DC 20003. On information and belief, Defendant may be served with process through its registered agent, Corporation Service

Company, 251 Little Falls Dr., Wilmington, DE 19808.

5. On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

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

VENUE

7. On information and belief, venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 7,917,285)

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

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

10. Plaintiff is the owner by assignment of the '285 Patent with sole rights to enforce the '044 Patent and sue infringers.

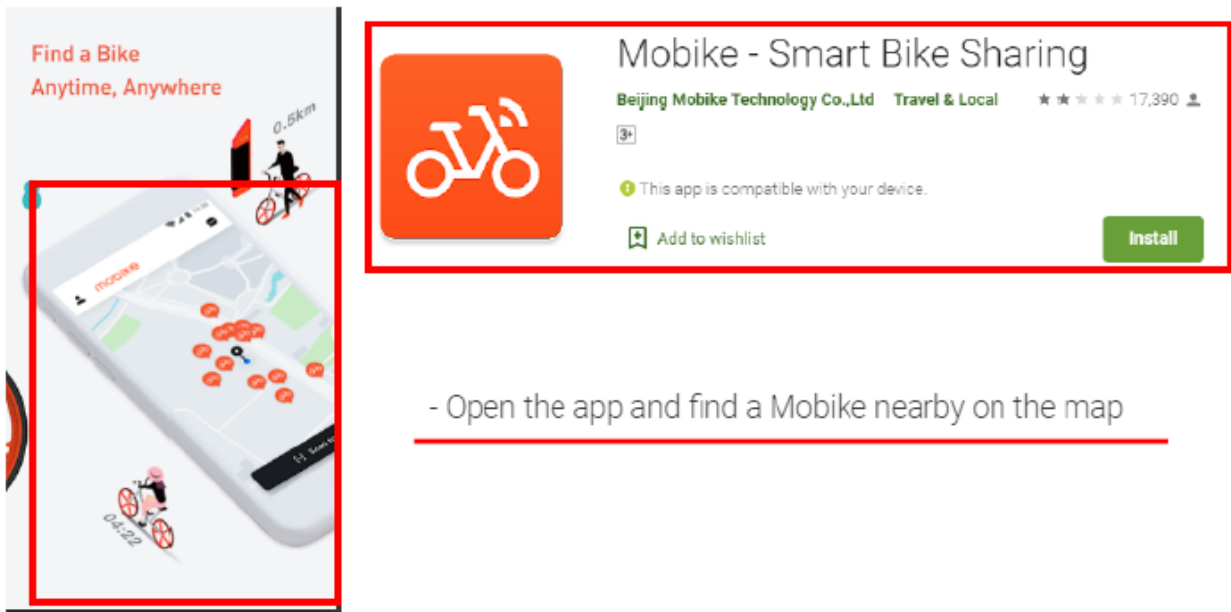
11. A copy of the '285 Patent, titled "Device, System and Method for Remotely Entering, Storing and Sharing Addresses for a Positional Information Device," is attached hereto as Exhibit A.

12. The '285 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 13, of the '285 Patent by making, using (at least

by having its employees, or someone under Defendant's control, test the System), importing, selling, and/or offering for sale a mobile website with associated hardware and software embodied, for example, in its cycle-booking service Mobike – Smart Bike Sharing, and the Mobike app (the “System”) covered by at least Claim 13 of the ‘285 Patent. The System is used, for example, in connection with Defendant’s website and its mobile app. Defendant has infringed and continues to infringe the ‘285 patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

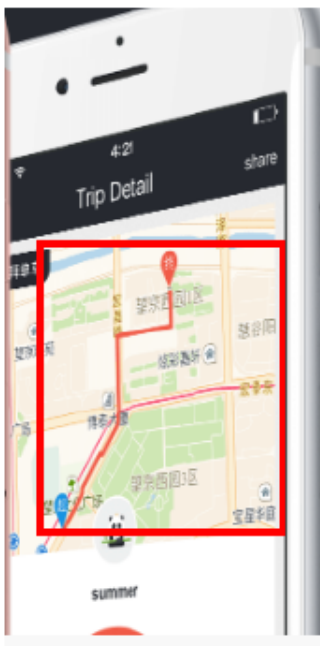
14. The System includes the mobile website and associated hardware. These tools provide for remote entry of location information, such as cycle locations, into a positional information device such as, for example, a table or smart phone. The website automatically loads locations onto the positional information device based on the user’s location. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.



Source: <https://play.google.com/store/apps/details?id=com.mobike.mobikeapp>

15. The System includes one or more servers that receive a request for an address of at least one location such as, for example, cycle locations, which are not already stored in the positional information device. The user can book a cycle by sending a request to a server (Juno's server) using the smartphone in conjunction with the app. The server may then, based on the user's request, share the address of the cycle locations, which are not already stored in the smartphone. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

- Once unlocked, enjoy the two-wheeled ride to your destination. Ride safe!



- Open the app and find a Mobike nearby on the map

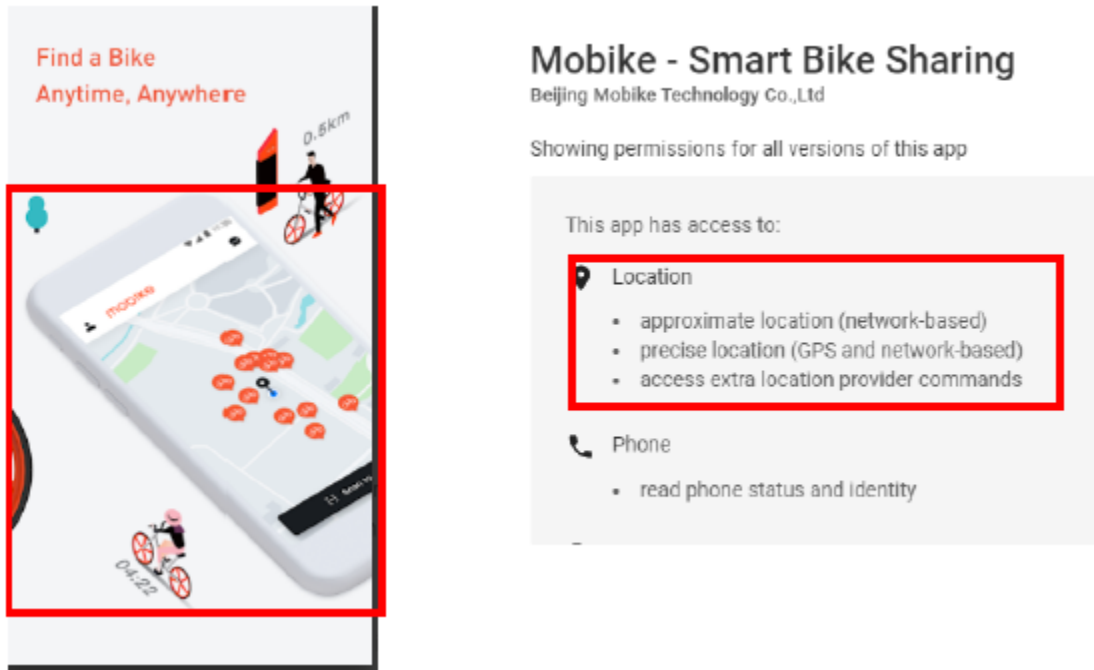
Source: <https://mobike.com/global/>

Source: <https://play.google.com/store/apps/details?id=com.mobike.mobikeapp>

16. The server(s) determine the address(es) of the cycle locations and transmits the determined address to the positional information device (e.g., tablet or smartphone). For example, the server(s) transmits to the positional information device a visual indication of the location on a map.

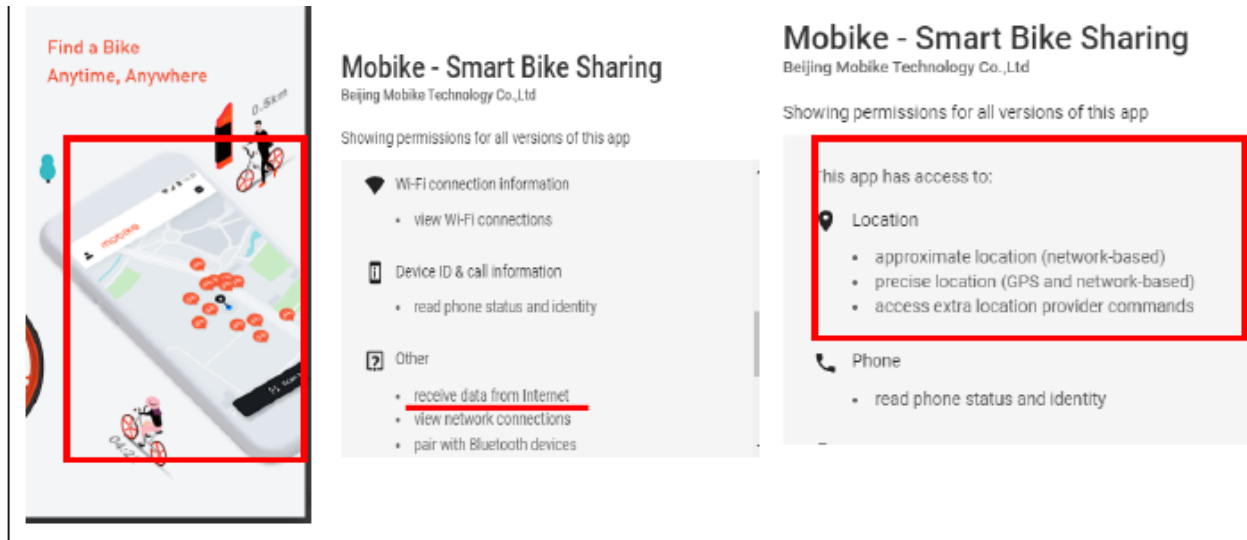
17. The smartphone together with the Mobike app is able to utilize the GPS location

(i.e., location information module) of the smartphone. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.



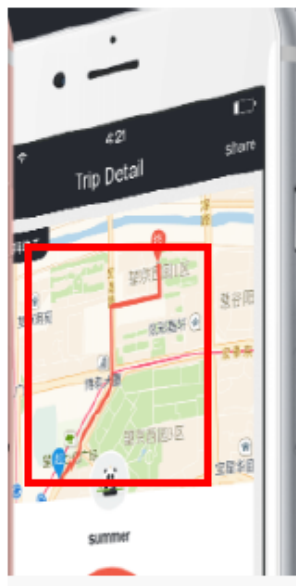
Source: <https://play.google.com/store/apps/details?id=com.mobike.mobikeapp>

18. The user's device (i.e. position information device) on which the application is installed, uses the cellular network communication transceiver (i.e., communication module) through which the smartphone (i.e., the positional information device) receives the locations/addresses of the cycles (i.e., location address). Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.



Source: <https://play.google.com/store/apps/details?id=com.mobike.mobikeapp>

19. The System includes a processing module (e.g., mapping software and the mobile website), which Defendant uses, and which receives the determined address(es) from the communication module. The processing module determines route guidance based on the location of the positional information device and the determined address(es). The application is installed on the smartphone and uses the smartphone's processor (i.e., a processing module) to receive the cycle locations (i.e., determined address(es)) and determines a travel route to the pickup location (i.e., determined address), based on the location of the user's smartphone. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.



Open the app and find a Mobike nearby on the map
Tap on a Mobike to find directions to it. You can also reserve it for 15 minutes to make sure you have time to get to the bike you want.

Source: <https://mobike.com/global/>

Source: <https://play.google.com/store/apps/details?id=com.mobike.mobikeapp>

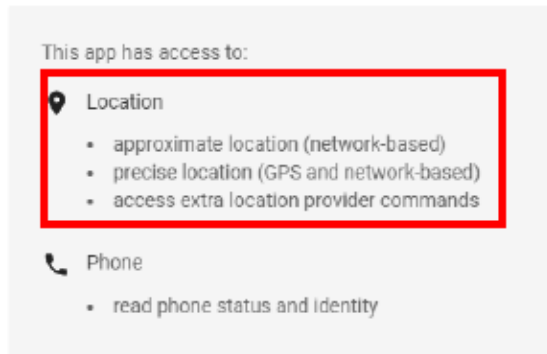
20. The System includes a display module (e.g., screen on the positional information device) for displaying the route guidance. Certain aspects of this element are illustrated in the screenshot(s) provided in connection with other allegations herein.

21. The System includes a communications network (e.g., cellular network) for coupling the positional information device to the server(s). Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

Mobike - Smart Bike Sharing

Beijing Mobike Technology Co.,Ltd

Showing permissions for all versions of this app



Mobike - Smart Bike Sharing

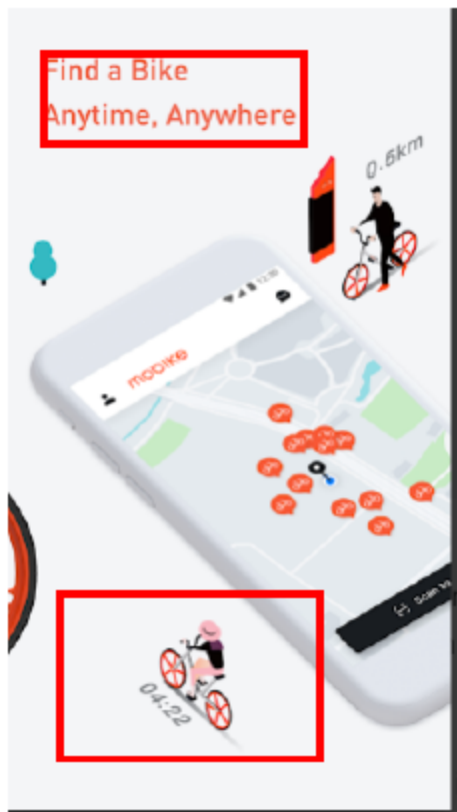
Beijing Mobike Technology Co.,Ltd

Showing permissions for all versions of this app



Source: <https://play.google.com/store/apps/details?id=com.mobike.mobikeapp>

22. The server(s) receives a time and date (e.g., the time and date of the request for a location) associated with the requested location(s) and transmits the associated time and date with the determined address(es) to the positional information device and the positional information device displays the determined address at the associated time and date. The application receives a time and date (e.g., the time and date of the request for a location to find a cycle) associated with the requested location(s) and transmits the associated time and date with the determined address(es) to the positional information device and the positional information device displays the determined address at the associated time and date. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.



Source: <https://play.google.com/store/apps/details?id=com.mobike.mobikeapp>

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

24. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

25. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 7,917,285 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

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

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

Dated: October 23, 2019

Respectfully submitted,

/s/ Stamatios Stamoulis
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