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8 **Attorney for Plaintiff**
9 **Hydro Net LLC**

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

12 **HYDRO NET LLC,**

13 **Plaintiff,**

14 **v.**

15 **INSEEGO CORP,**

16 **Defendant.**

17 **Case No. '20CV0613 GPC AGS**

18 **COMPLAINT FOR PATENT**
19 **INFRINGEMENT**

20 **Jury Trial Demanded**

21 **COMPLAINT FOR PATENT INFRINGEMENT**

22 Plaintiff Hydro Net LLC (“Hydro Net”), through its attorneys, hereby files
23 this Complaint for Patent Infringement against Defendant Inseego Corp.
24 (“Inseego”), and alleges the following:

25 **PARTIES**

26 1. Plaintiff Hydro Net LLC is a corporation organized and existing under
27 the laws of Texas that maintains its principal place of business at 2108 Dallas Pkwy,
28 Ste 214 - 1020, Plano, TX 75093-4362.

1 to the '706 Patent was filed on 10/2/2001. A true and correct copy of the '706 Patent
2 is attached hereto as Exhibit 1 and incorporated herein by reference.

3 9. The '706 Patent is valid and enforceable.

4 **COUNT 1:**

5 **INFRINGEMENT OF THE '706 PATENT**

6 10. Hydro Net incorporates the above paragraphs herein by reference.

7 11. **Direct Infringement.** Defendant has been and continues to directly
8 infringe one or more claims of the '706 Patent in at least this District by making,
9 using, offering to sell, selling and/or importing, without limitation, at least the Skyus
10 300 Products identified in the charts incorporated into this Count below (the
11 "Exemplary Inseego Products") that infringe at least the exemplary Claim 1 of the
12 '706 Patent (hereinafter, the "Exemplary '706 Patent Claim") literally or by the
13 doctrine of equivalents. On information and belief, numerous other devices that
14 infringe the claims of the '706 Patent have been made, used, sold, imported, and
15 offered for sale by Defendant and/or its customers.

16 12. Defendant also has and continues to directly infringe, literally or under
17 the doctrine of equivalents, the Exemplary '706 Patent Claim, by having its
18 employees internally test and use these Exemplary Products.

19 13. The service of this Complaint upon Defendant constitutes actual
20 knowledge of infringement as alleged here.

21 14. Despite such actual knowledge, Defendant continues to make, use, test,
22 sell, offer for sale, market, and/or import into the United States, products that
23 infringe the '706 Patent. On information and belief, Defendant has also continued
24 to sell the Exemplary Inseego Products and distribute product literature and website
25 materials inducing end users and others to use its products in the customary and
26 intended manner that infringes the '706 Patent. Thus, on information and belief,
27 Defendant is contributing to and/or inducing the infringement of the '706 Patent.

28

- 1 B. A judgment that Defendant has infringed, contributorily infringed,
2 and/or induced infringement of one or more claims of the ‘706 Patent;
- 3 C. An accounting of all damages not presented at trial;
- 4 D. A judgment that awards Hydro Net all appropriate damages under 35
5 U.S.C. § 284 for Defendant's past infringement, and any continuing or
6 future infringement of the Patent-in-Suit, up until the date such
7 judgment is entered, including pre- or post-judgment interest, costs, and
8 disbursements as justified under 35 U.S.C. § 284 and, if necessary, to
9 adequately compensate Hydro Net for Defendant’s infringement, an
10 accounting:
- 11 i. that this case be declared exceptional within the meaning of 35
12 U.S.C. § 285 and that Hydro Net be awarded its reasonable
13 attorneys’ fees against Defendant that it incurs in prosecuting this
14 action;
- 15 ii. that Hydro Net be awarded costs, and expenses that it incurs in
16 prosecuting this action; and
- 17 iii. that Hydro Net be awarded such further relief at law or in equity as
18 the Court deems just and proper.

19
20 Dated: March 30, 2020

Respectfully submitted,

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