

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SOCIAL POSITIONING INPUT  
SYSTEMS, LLC,

Plaintiff,

vs.

CALAMP CORP.,

Defendant.

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Case No: 3:20:-cv-3549

PATENT CASE

**COMPLAINT**

Plaintiff Social Positioning Input Systems, LLC (“Plaintiff” or “SPIS”) files this Complaint against CalAmp Corp. (“Defendant” or “CalAmp”) for infringement of United States Patent No. 9,261,365 (hereinafter “the ‘365 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 1801 NE 123 Street, Suite 314, Miami, FL 33181.

4. On information and belief, Defendant is a Delaware corporation with its principal office located at 15635 Alton Parkway, Suite 250, Irvine, CA 92618. On information and belief, Defendant may be served through its agent, Corporation Service Company, 251 Little Falls

Drive, 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 acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District at, for example, 2400 N. Glenville Drive, Suite 225B, Richardson, TX 75082.

### **COUNT I** **(INFRINGEMENT OF UNITED STATES PATENT NO. 9,261,365)**

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.*

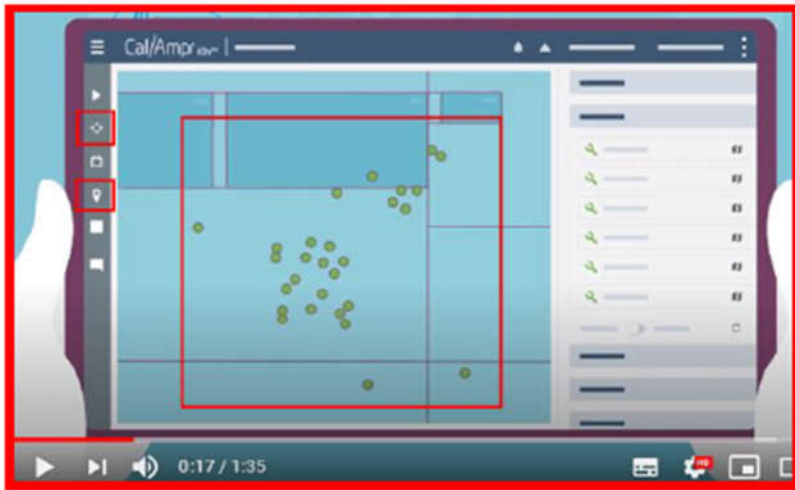
10. Plaintiff is the owner by assignment of the '365 Patent with sole rights to enforce the '365 Patent and sue infringers.

11. A copy of the '365 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 '365 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 1, of the '365 Patent by making, using (at least by having its employees, or someone under Defendant's control, test the accused Product), importing, selling, and/or offering for sale associated hardware and software for asset locating services (e.g., CalAmp tracker and system and CalAmp iOn software) ("Product") covered by at least Claim 1 of the '365 Patent. Defendant has infringed and continues to infringe the '365 patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

14. The Product provides a vehicle tracking system for real-time GPS tracking of assets. A user can receive location information on a positional information device (e.g., mobile device or computer). 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://www.youtube.com/watch?v=-0-dZWXOaws&list>

Source: <https://www.calamp.com/resources/hardware-spec-sheets/lmu-3030/>

## Features

- Optimize operations with real-time asset, equipment and vehicle tracking and work visualization
- Track location on demand along with address, sensor and other attribute information
- View all AEMP data feeds in one view
- Monitor in real-time and receive alert notifications
- Minimize downtime with preventive maintenance scheduling
- Receive reports based on detailed analytics
- Define usage rules, virtual boundaries and track utilization

## Geofences

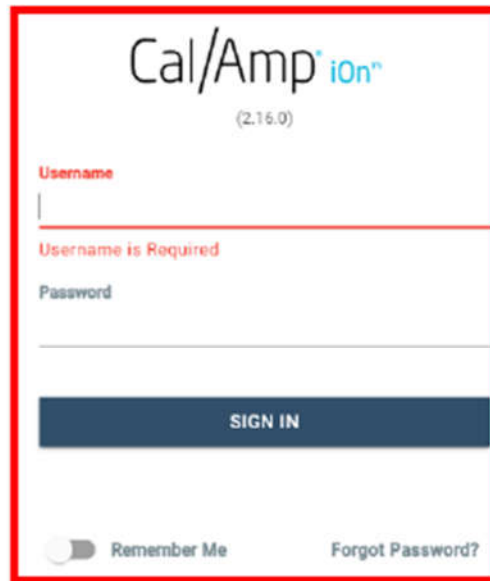
Real-time notification when your fleet enters or leaves work zones, off-limits areas and locations of other interest.

Source: <https://www.calamp.com/products/ion/>

15. The Product software sends a request from a first (requesting) positional information device (e.g., mobile device or desktop with software installed) to a server. The request is for the real-time location (e.g., stored address) of a vehicle or vehicles, and includes a first identifier of the requesting positional information device (e.g., user ID and password for the Product software used in the particular enterprise). The request is sent to the Product server for transmitting the vehicle location. The server receives the at least one address from a second (sending) positional information device at the vehicle. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

Our full-featured vehicle tracking solutions highlight vehicle tracking devices that are designed for covert installation in any vehicles for on-road tracking. Using superior internal antennas for both cellular and GPS, CalAmp's vehicle tracking devices are easy to install, economically priced while providing reliable vehicle tracking performance and a dependable communication link between the vehicle tracking device and your application servers

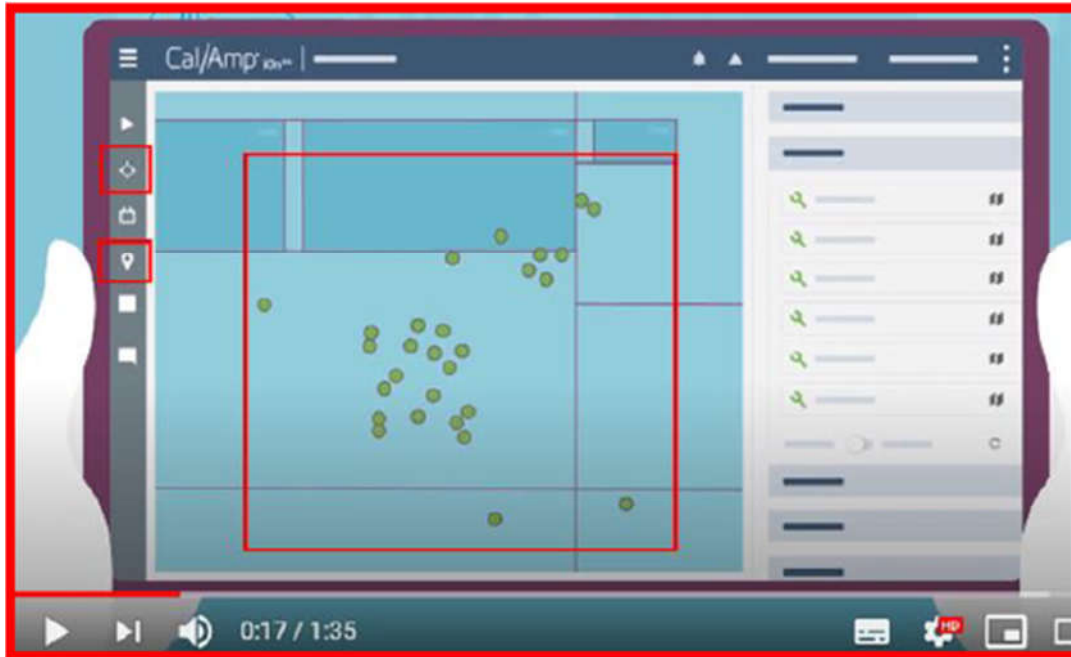
Source: <https://www.calamp.com/products/vehicle-trackers/>



Source: <https://connect.calamp.com/ion/#/>

Source: <https://www.calamp.com/resources/hardware-spec-sheets/imu-3030/>

16. The at least one address is received from the server at the requesting positional information device. For example the Product's server transmits the position of an asset (at least one address) to the requesting positional information device. 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://www.youtube.com/watch?v=-0-dZWXOaws&list>

## Mapping

Rapidly analyze vehicle data for efficient, critical decision-making.

REAL-TIME TRACKING: Displays current location and status, along with address, sensor, AEMP feeds and other attribute information.

MAP VIEWING FEATURES: Esri GIS-based mapping displays your fleet using your own GIS map layers referencing infrastructure, assets, routes, facilities and more.

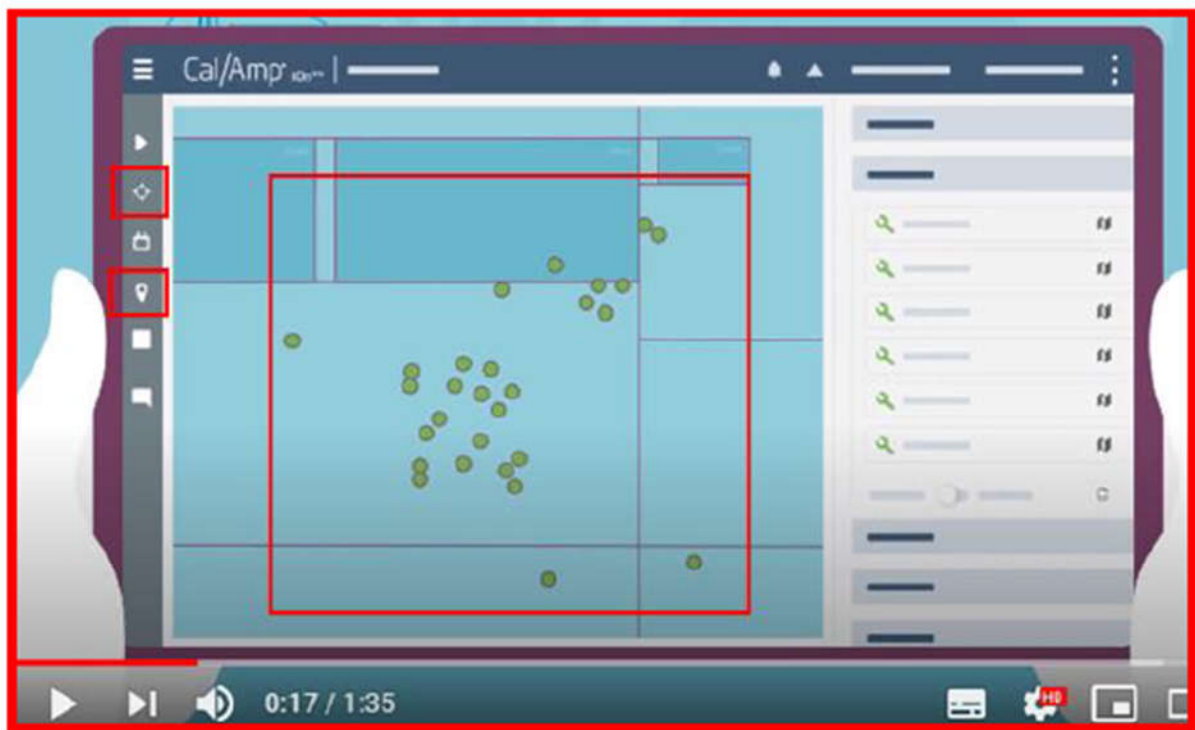
## Geofences

Real-time notification when your fleet enters or leaves work zones, off-limits areas and locations of other interest.

Source: <https://www.calamp.com/products/ion/>

17. A second identifier for the second (sending) positional information device is determined based on the first identifier and the server retrieves the at least one address stored in

the at least one sending positional information device. The Product application installed on the requesting positional information device requests (from the server) the vehicle's GPS location (i.e., at least one stored address stored). As shown above, before activating the tracker (i.e., the sending positional information device), a unique tracking device's ID number (i.e., second identifier) needs to be added to the user's account identified by the user login ID and password (i.e., the first identifier). Hence, the tracker device's ID number (i.e., second identifier) is mapped to the user's login ID (i.e., the first identifier) for tracking the real-time location (i.e., at least one stored address stored) of the vehicle. 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://www.youtube.com/watch?v=-0-dZWXOaws&list>

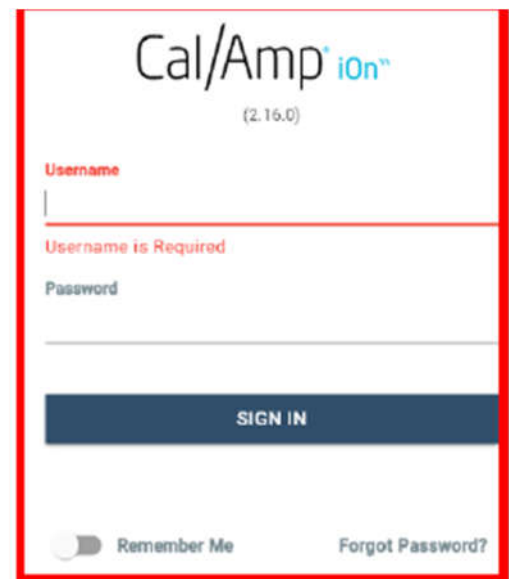
REAL-TIME TRACKING: Displays current location and status, along with address AEMP feeds and other attribute information.

MAP VIEWING FEATURES: Esri GIS-based mapping displays your fleet using your map layers referencing infrastructure, assets, routes, facilities and more.

## Geofences

Real-time notification when your fleet enters or leaves work zones, off-limit locations of other interest.

Source: <https://www.calamp.com/products/ion/>

A screenshot of the Cal/Amp iOn login interface. The header displays the logo "Cal/Amp iOn" and the version number "(2.16.0)". Below the logo are two input fields: "Username" and "Password". The "Username" field is currently empty, and a red error message "Username is Required" is displayed below it. A dark blue "SIGN IN" button is positioned below the password field. At the bottom of the form, there is a "Remember Me" toggle switch and a "Forgot Password?" link.

Source: <https://connect.calamp.com/ion/#/>

Source: <https://www.calamp.com/resources/hardware-spec-sheets/lmu-3030/>



## 5.1 Telematics Event Types Common Fields

These fields are common to all telematics events messages:

- **deviceEsn** – The Electronic Serial Number of the device, example “4532121405”
- **deviceAird** – Unique 9 character identifier of the instance of this device, example “G6P-NHL-XCX”.
- **deviceId** – Identifier of the device within the Account, example “77”.
- **eventTime** – When the event was recorded at the device (UTC Time)
- **messageUuid** – a unique identifier for this message.
- **assetName** – the name of the Asset associated with this device (if any)
- **assetId** – the ID of the Asset associated with this device (if any)

Source: [http://help.calamp.com/files/references/appnotes/an\\_connect\\_3030\\_standard\\_Profile.pdf](http://help.calamp.com/files/references/appnotes/an_connect_3030_standard_Profile.pdf)

18. Defendant’s actions complained of herein will continue unless Defendant is enjoined by this court.

19. 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.

20. 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. 9,261,365 (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: December 2, 2020

Respectfully submitted,

*/s/ Jay Johnson*

**JAY JOHNSON**

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**ATTORNEYS FOR PLAINTIFF**

**EXHIBIT A**