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5 *Attorney(s) for Plaintiff Geographic Location Innovations, LLC*

7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

9
10 GEOGRAPHIC LOCATION
INNOVATIONS, LLC,
11 *Plaintiff,*

12 v.

13 TAJIMA AMERICA CORP.,
14
15 *Defendant.*

CASE NO.: 2:21-cv-02626

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

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17 Plaintiff Geographic Location Innovations LLC (“Plaintiff” or “GLI”) files this
18 Complaint against Tajima America Corp. (“Defendant” or “Tajima”) for infringement
19 of United States Patent No. 7,917,285 (hereinafter “the ‘285 Patent”).
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21 **PARTIES AND JURISDICTION**

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

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

2 3. Plaintiff is a Texas limited liability company with a virtual office located
3 at 1 East Broward Boulevard, Suite 700, Ft. Lauderdale, FL 33301.

4 4. On information and belief, Defendant is a New Jersey corporation with
5 a place of business located at 19925 South Susana Road, Rancho Dominguez,
6 California 90221.

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

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

14 **VENUE**

15 7. On information and belief, venue is proper in this District under 28
16 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District.
17 Alternatively, acts of infringement are occurring in this District and Defendant has a
18 regular and established place of business in this District.

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

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

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

3 10. Plaintiff is the owner by assignment of the ‘285 Patent with sole rights
4 to enforce the ‘044 Patent and sue infringers.
5

6 11. A copy of the ‘285 Patent, titled “Device, System and Method for
7 Remotely Entering, Storing and Sharing Addresses for a Positional Information
8 Device,” is attached hereto as Exhibit A.
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10 12. The ‘285 Patent is valid, enforceable, and was duly issued in full
11 compliance with Title 35 of the United States Code.
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13 13. On March 29, 2011, the United States Patent & Trademark Office
14 (USPTO) duly and legally issued the ‘285 Patent.
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16 14. The ‘285 Patent teaches a method and apparatus for storing and sharing
17 addresses for a positional information device. Among other things, the claimed
18 system allows a user to request an address, such as the address for a store, from a
19 server. The server determines the requested address and transmits it to the positional
20 information device. The device receives the address and the system determines route
21 guidance to the store address based at least in part on the location of the positional
22 information device. The server also receives a time and date associated with the
23 address request.
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26 15. The ‘285 Patent invention solves problems that existed with then-
27 existing navigation systems associate with having address information loaded onto a
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1 positional information device (such as a GPS-equipped mobile phone). Problems
2 arose due to a number of different factors including: (1) disparate navigational
3 devices; (2) navigational devices that required preprogramming of address
4 information; (3) the use of different vehicles by one or more users all going to the
5 same address; and (4) users needing address information downloaded while driving.

7 See, '285 Patent Specification, 1:35-2:13.

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9 16. At the time of the invention claimed in the '285 Patent, telematics
10 enabled a central processing center to provide certain services such as help with
11 directions and tracking stolen vehicles. Telematics, however, did not provide address
12 downloads and associated route guidance to stores to a user's mobile phone. The
13 claimed invention provides these features and overcomes problems associated with
14 prior systems.
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17 17. The '285 Patent is directed to computerized technologies to provide
18 users with easy access to address downloads and associated route guidance. Among
19 other things, the '285 Patent claims (in Claim 13 for example), a system for entering
20 location information into a positional information device. The system includes a
21 server, which is configured to receive an address request, to determine the address of
22 at least one location, and to transmit that address to the positional information device.
23
24 The positional information device includes: (1) a location information module for
25 determining the location of the device; (2) a communication module for receiving the
26 information from the server; (3) a processing module for receiving the at least one
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1 determined address and for determining route guidance based at least in part on the
2 location of the device; (4) a display module for displaying the route guidance; and (5)
3 a communication network to couple the device to the server. Collectively, these
4 components operate in a way that was neither generic, nor well-known, at least at the
5 time of the invention. Moreover, certain individual components (e.g., the processing
6 module and the server) operate in a way that is neither generic nor well-known.
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9 18. The '285 Patent solves problems with the art that are rooted in computer
10 technology and that are associated with electronic transmission, loading, and storage
11 of location information, as well as automatic provisioning of route guidance. The '285
12 Patent claims do not merely recite the performance of some business practice known
13 from the pre-Internet world along with the requirement to perform it on the Internet.
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16 19. The '285 Patent invention includes include software and hardware that
17 do not operate in a conventional manner.

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19 20. The improvements of the '285 Patent and the features recited in the
20 claims of the '285 Patent provide improvements to conventional hardware and
21 software systems and methods. The improvements render the claimed invention of
22 the '285 Patent non-generic in view of conventional components.
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25 21. The improvements of the '285 Patent and the features recited in the
26 claims of the '285 Patent would not be well-understood, routine or conventional to
27 one of ordinary skill in the art at the time of the invention.
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22. Upon information and belief, Defendant has infringed and continues to

1 infringe one or more claims, including at least Claim 13, of the ‘285 Patent by making,
2 using (at least by having its employees, or someone under Defendant's control, test
3 the System), importing, selling, and/or offering for sale a website with associated
4 hardware and software embodied, for example, in its store locator system (the
5 “System”) covered by at least Claim 13 of the ‘285 Patent. The System is used, for
6 example, in connection with Defendant’s website at
7 <https://www.tajimatool.com/store-locator/>. Defendant has infringed and continues to
8 infringe the ‘285 patent either directly or through acts of contributory infringement or
9 inducement in violation of 35 U.S.C. § 271.
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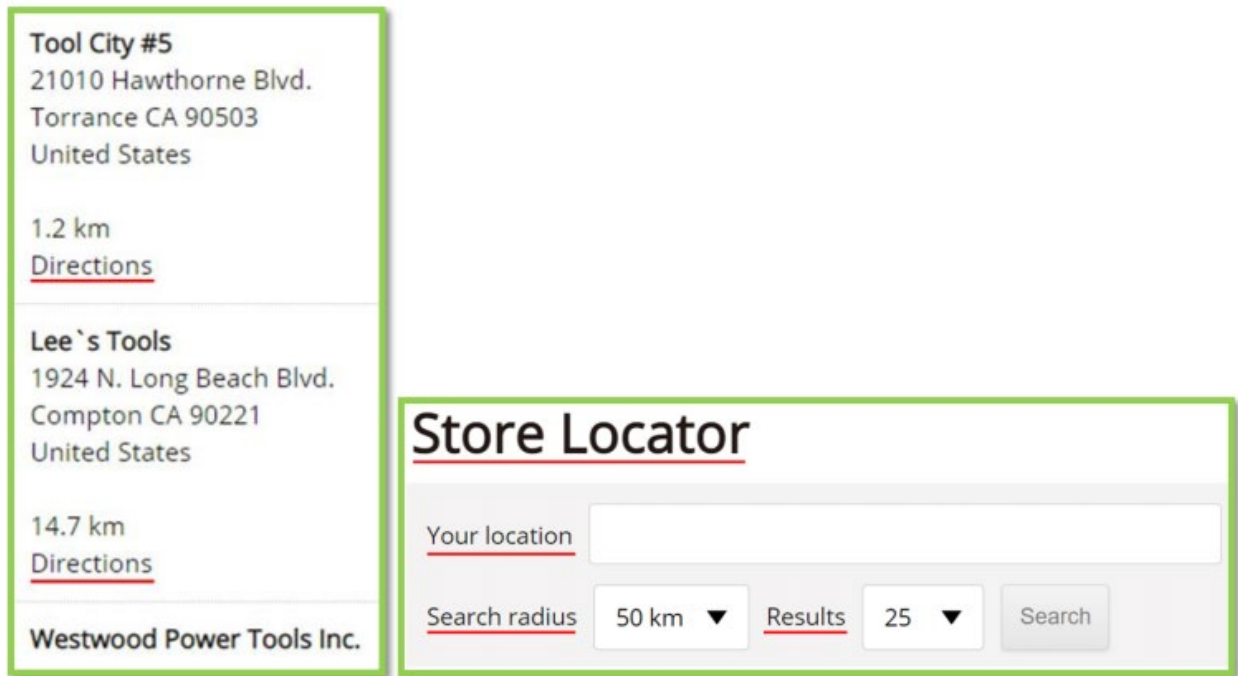
13 23. The System includes the mobile website and associated hardware. These
14 tools provide a route planner mobile application. This application provides for remote
15 entry of location information, such as destination into a positional information device
16 such as, for example, a computer or smart phone in which users can find stores. The
17 website automatically loads available routes onto the positional information device
18 based on the user’s location. Certain aspects of this element are illustrated in the
19 screenshot(s) below and/or in those provided in connection with other allegations
20 herein.
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Source: <https://www.tajimatool.com/store-locator/>

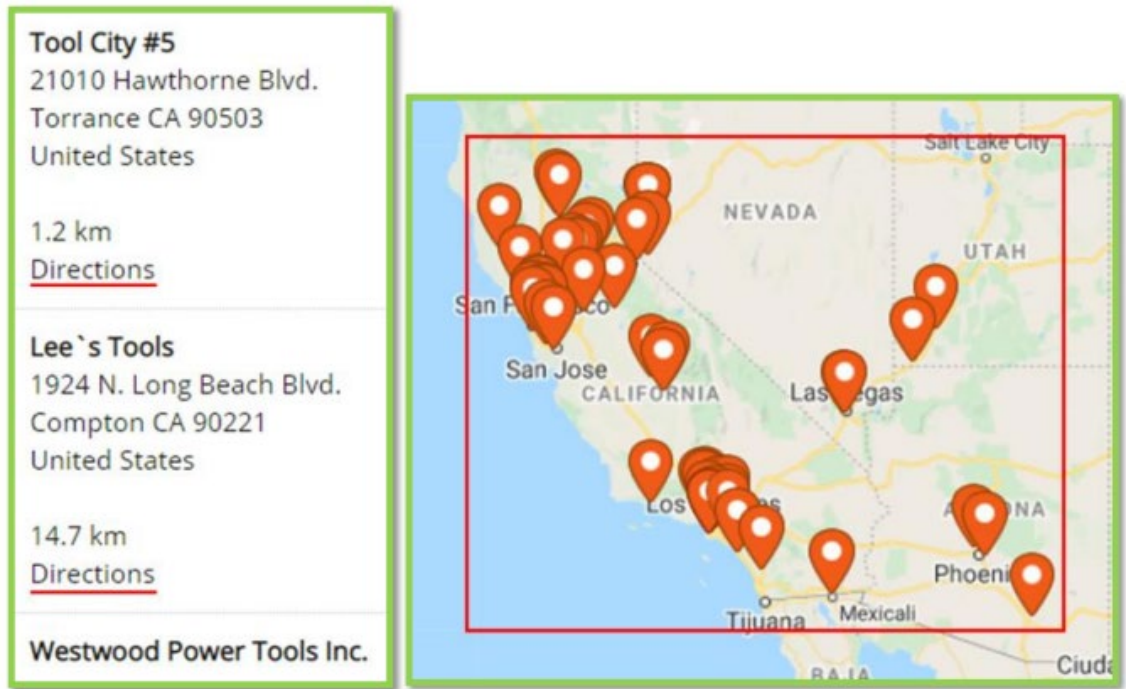
24. The System includes one or more servers that receive a request for an address such as destination (i.e., an address of a location not stored within the positional device, such as a smartphone). The server determines the address of the destination (i.e., address of the at least one location) and transmits the determined address to the positional information device. The user can see (on the positional information device) a visual indication of the destination in a map. 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.tajimatool.com/store-locator/>

25. The server(s) determine the address(es) and transmits the determined address to the positional information device (e.g., smartphone). For example, the server(s) transmits to the positional information device a visual indication of the location on a map. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

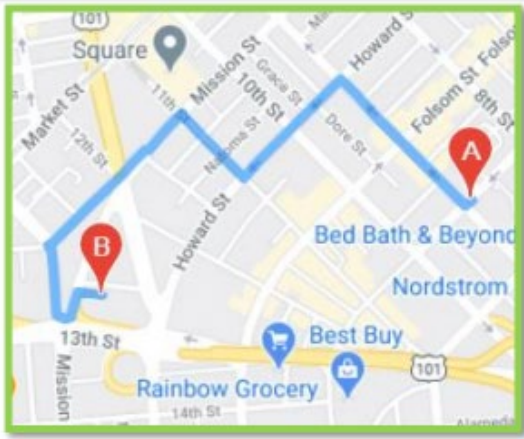
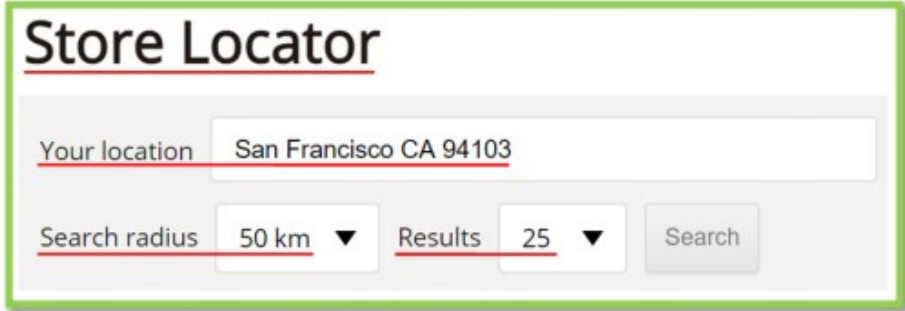
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Source: <https://www.tajimatool.com/store-locator/>

26. The Product includes a locational information module for determining the location information of the positional information device. For example, the system installed on the smartphone (i.e., positional information device) is able to utilize the GPS location (i.e., location information module) to determine the location of the smartphone (i.e., 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.

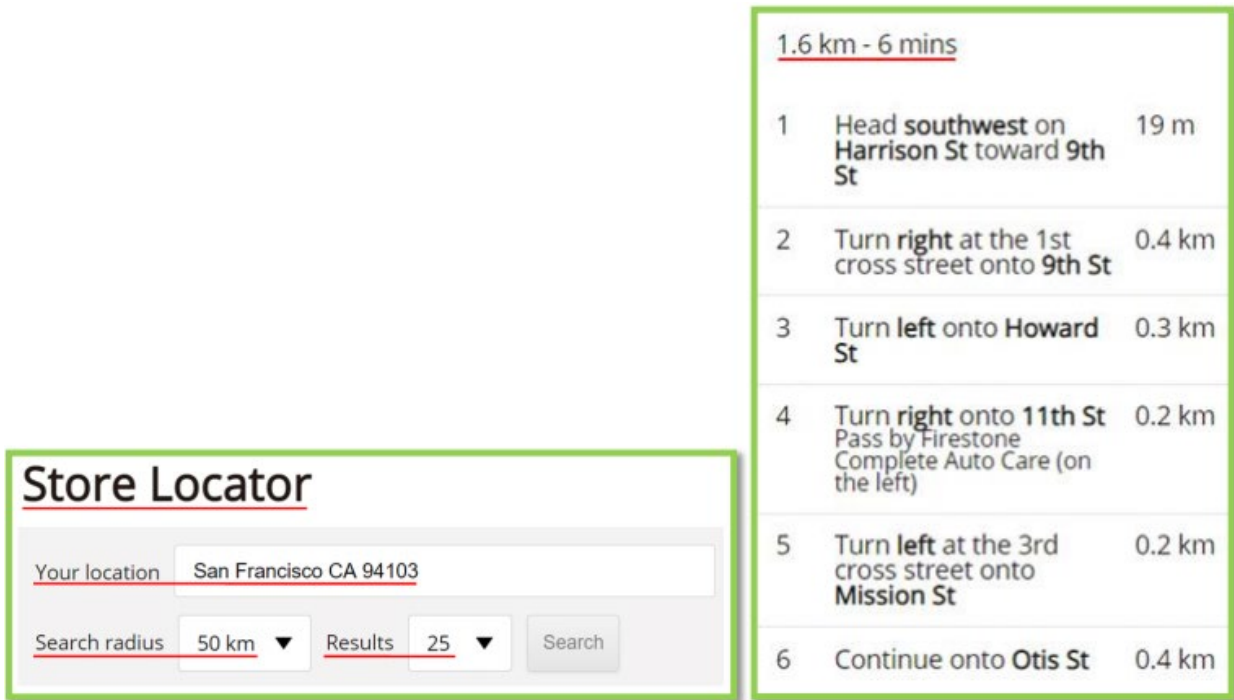
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Source: <https://www.tajimatool.com/store-locator/>

27. 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 address of the destination (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.

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Source: <https://www.tajimatool.com/store-locator/>

28. The System includes a processing module (e.g., mapping software and the mobile website), 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). Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

Store Locator

Your location

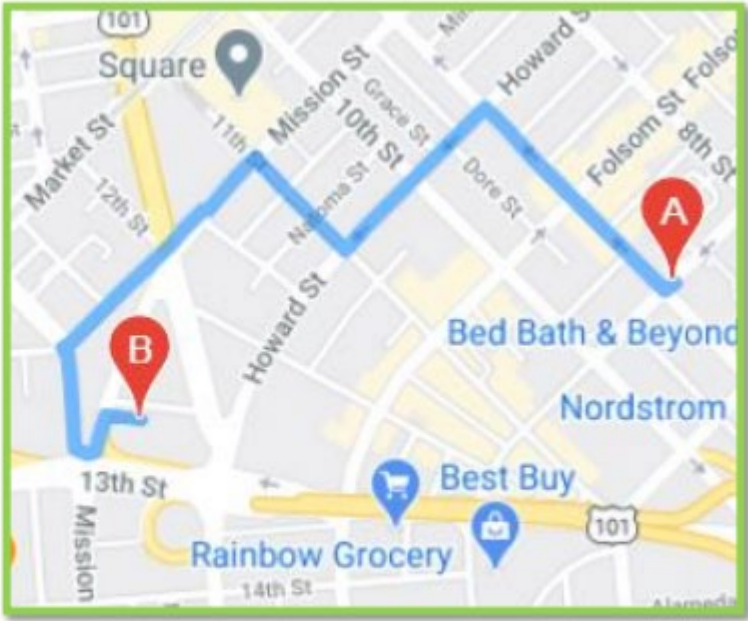
Search radius

Results

1.6 km - 6 mins

- 1 Head southwest on Harrison St toward 9th St 19 m
- 2 Turn right at the 1st cross street onto 9th St 0.4 km
- 3 Turn left onto Howard St 0.3 km
- 4 Turn right onto 11th St 0.2 km
Pass by Firestone Complete Auto Care (on the left)
- 5 Turn left at the 3rd cross street onto Mission St 0.2 km
- 6 Continue onto Otis St 0.4 km

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Source: <https://www.tajimatool.com/store-locator/>

29. 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.

30. The System includes a communications network (e.g., cellular network and/or Internet) 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.

31. 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 and transmits the associated time and date with the determined address (i.e., destination) by the help of maps (i.e., communication module) to the positional information device (i.e.,

1 smartphone) and the positional information device displays the determined address at
 2 the associated time and date. Certain aspects of this element are illustrated in the
 3 screenshot(s) below and/or in those provided in connection with other allegations
 4
 5 herein.

Store Locator

Your location San Francisco CA 94103

Search radius 50 km Results 25 Search

1.6 km - 6 mins

1	Head southwest on Harrison St toward 9th St	19 m
2	Turn right at the 1st cross street onto 9th St	0.4 km
3	Turn left onto Howard St	0.3 km
4	Turn right onto 11th St Pass by Firestone Complete Auto Care (on the left)	0.2 km
5	Turn left at the 3rd cross street onto Mission St	0.2 km
6	Continue onto Otis St	0.4 km

```

window.dataLayer = window.dataLayer || [];
function gtag(){dataLayer.push(arguments);}
gtag('js', new Date());
gtag('config', 'UA-61451757-9');
    
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18 Source: <https://www.tajimatool.com/store-locator/>
 19 Source: <https://www.tajimatool.com/store-locator/>(inspect page)

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

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

25 34. 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: March 25, 2021

Respectfully submitted,

/s/ Stephen M. Lobbin

Stephen M. Lobbin
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SML AVVOCATI P.C.

***Attorney(s) for Plaintiff Geographic Location
Innovations, LLC***