IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

RYAN HARDIN AND ANDREW HILL,

Plaintiffs,

Civil Action No. 2:21-cv-289

vs.

JURY TRIAL

LG ELECTRONICS, INC. AND LG ELECTRONICS ALABAMA, INC.,

Defendants.

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Ryan Hardin and Andrew Hill file this Complaint for Patent Infringement against LG Electronics, Inc. ("LG Korea") and LG Electronics Alabama, Inc. ("LGEA") (collectively, "LG"), and allege as follows:

THE PARTIES

1. Plaintiff Ryan Hardin is a citizen of Texas with a principal residence in Houston,

Texas. Mr. Hardin is a technology professional with over 20 years of experience.

2. Plaintiff Andrew Hill is a citizen of Texas with a principal residence in Houston,

Texas. Mr. Hill is a technology professional with over 20 years of experience.

3. Defendant LG Korea is a corporation formed under the laws of the country of South Korea, with its principle place of business at LG Twin Tower 128, Yeoui-daero, Yeongdeungpogu, Seoul, South Korea. Upon information and belief, LG Korea does business in Texas directly and/or through intermediaries and offers its products and/or services, including the infringing

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products, to customers and potential customers located in Texas, including in the Eastern District of Texas.

4. Defendant LGEA is a wholly-owned subsidiary of LG Electronics U.S.A., Inc., which is a wholly-owned subsidiary of LG Korea. LGEA is a corporation organized under the laws of the State of Alabama, and has its principal place of business located at 201 James Record Road, Huntsville, Alabama 35824, USA. Upon information and belief, LGEA provides customer service and distribution for all official LG brand products purchased in the United States. Upon information and belief, LGEA has regular and established places of business in Texas at least at 2151-2155 Eagle Parkway, Fort Worth, Texas 76177, and 14901 Beach Street, Fort Worth, Texas 76177. Both of these locations are in the Eastern District of Texas.

JURISDICTION AND VENUE

5. This is an action arising under the patent laws of the United States, 35 U.S.C. § 271. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

6. Venue is proper in this judicial district under 28 U.S.C. §§ 1391 and 1400(b). LG Korea is not a resident of the Untied States and thus may be used in any judicial district. LGEA has committed acts of infringement, directly and/or indirectly, in this district with resect to each asserted patent and has a regular and established place of business in this district.

7. This Court has personal jurisdiction over LG Korea, directly and/or through intermediaries, distributors, importers, customers, subsidiaries, and/or consumers including its wholly owned subsidiary, LGEA. Through direction and control of this subsidiary and/or other subsidiaries, LG Korea has committed acts of direct and/or indirect patent infringement within the State of Texas, and elsewhere in the United States. Upon information and belief, LG Korea has

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placed and continues to place infringing products and/or products that practice the infringing processes into the stream of commerce via established distribution channels comprising at least subsidiaries and distributors, such as LGEA, and customers with the knowledge and/or intent that those products are and/or will be imported, used, offered for sale, sold, and continue to be sold in the United States and the State of Texas, including in this judicial district.

8. For example, LG Korea has authorized sellers and sales representatives that offer and sell products pertinent to this Complaint through the State of Texas, including in this judicial district, and to consumers throughout this judicial district, such as: Best Buy, 422 West TX-281 Loop, Suite 100, Longview, Texas 75605.

9. This Court has personal jurisdiction over LGEA. LGEA has continuous and systematic business contacts with the state of Texas. LGEA, directly and/or through subsidiaries or intermediaries (including distributors, retailers, and others), conducts its business extensively throughout Texas, by one or more of repairing, shipping, distributing, and assisting customers with its products and services in the State of Texas and the Eastern District of Texas. LGEA, directly and/or through subsidiaries or intermediaries (including distributors, retailers, and others), has purposefully and voluntarily placed infringing products and services into this district and into the stream of commerce with the intention and expectation that they will be purchased and used by consumers in this district. LGEA has provided these infringing products and services in this district with respect to each asserted patent through their infringing use of the Accused Products, including when LGEA and its customers put the Accused Products into service

and receive a benefit, or LGEA provides customer support, and LGEA is liable for these additional acts of direct infringement and indirect infringement in this district.

10. Upon information and belief, Defendants have admitted or not contented venue and personal jurisdiction in this judicial district in other patent infringement actions.

11. Upon information and belief, the LG products accused of infringement in this case are manufactured by or on behalf of LG Korea and/or LGEA.

BACKGROUND OF THE INVENTORS

12. Inventors Ryan Hardin and Andrew Hill both grew up in Henderson, Texas. After college, Hardin and Hill started an IT services company called Pronet Solutions Corp. in 2002 in East Texas. Upon establishing the business after a few years, Hardin and Hill began to investigate and discuss emerging and future business opportunities that would leverage their technological backgrounds and expertise.

13. In the 2006-2007 timeframe, Hardin and Hill were interested in the digital billboard business. At that time, digital billboards were relatively new, and Hardin and Hill saw an opportunity to grow a business for displaying content (e.g., advertisements) on digital billboards, which they could efficiently manage and control remotely. However, Hardin and Hill ultimately saw significant barriers to entry for getting into the digital billboard business, including costs, regulatory considerations, and governmental issues.

14. Then, in late 2007, Hardin was at a meeting in Henderson, and when getting in his car to go to his next appointment, he looked at his phone and thought—why should he and Hill risk the expense to erect digital billboards if much of the public might soon be carrying digital billboards in their pockets? Of course, at that time, smartphones were in a period of rapid

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development,¹ and while a few phones had GPS, access to the internet, and apps, they were certainly not as commonplace as today. Hardin and Hill were betting on the future. Going forward, Hardin and Hill continued to fine-tune the implementation of their invention and applied for their first patent on May 1, 2009.

15. Separate from the patented invention, not only did Hardin and Hill realize a technical solution was needed—but a platform was also needed for the technology to be marketed to consumers. In this same timeframe, Hardin and Hill coincidentally received a phone call from the Henderson Area Chamber of Commerce, which requested a website be designed—but as cheaply as possible. Hardin and Hill ultimately saw this as an opportunity for the platform they were looking for. As a result, Hardin and Hill decided they would develop and host the website for free for the Henderson Area Chamber of Commerce, but then ultimately, build free websites for all chambers of commerce using the same platform. Then, through the access the chambers had with businesses, the websites could get advertising revenue—which is how Hardin and Hill could ultimately be compensated. Moreover, once setting up this network of chambers of commerce was complete, eventually the patented technology could also be marketed and used to create location-aware content delivery on mobile devices as they envisioned an increased demand from businesses for location-aware apps and from the public for mobile devices. Hardin and Hill called the platform "Chamber Planet."

¹ For example, upon information and belief, the first version of the Samsung Galaxy smartphone was released in June 2009, and Google launched the Android Market in October 2008 as a way for users to download apps for Android-based phones (e.g., Samsung Galaxy).

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16. Hardin and Hill spent years developing Chamber Planet and started to get numerous chambers of commerce on board. At one point, Hardin and Hill were working with the Henderson Area Chamber, Jacksonville Chamber, Bullard Area Chamber, Pittsburgh Camp County Chamber, and the Greater Marshall Chamber of Commerce. In fact, Hardin and Hill negotiated the purchase of the MarshallTexas.com domain from a third party and provided it to the Greater Marshall Chamber of Commerce. As more chambers got on board, more challenges arose, including that the chambers also desired an integrated billing system with their websites—which was complex and took significant time to develop.

17. On or around 2012, however, while Hardin and Hill were still developing and growing the Chamber Planet platform, their separate business Pronet also began to experience some challenges, largely due to the business disruptions created by the financial crisis. Hardin and Hill had to focus more on Pronet, which was the business that provided revenue to them—and this slowed the growth of Chamber Planet. In addition, numerous members of Hardin's family began to have serious health issues. Hardin's wife had medical issues in pregnancies which required multiple surgeries and then she later developed cancer. Around the same time, Hardin's mother fell and broke her back, and Hardin's father required a lung transplant. Hardin needed to prioritize his family over the continued development of Chamber Planet for a period of time.

18. During this period of time, however, Hardin and Hill noticed that mobile devices were starting to utilize Hardin and Hill's invention. Moreover, these companies developing the mobile devices and related software and services had significantly more financial resources that enabled them to commercialize the invention much more quickly than Hardin or Hill could. As a result, Hardin and Hill then decided to focus more on protecting the intellectual property they had

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developed, while continuing to look out for opportunities to bounce back and continue to build the platform they had invented.

THE ASSERTED PATENTS

19. Plaintiffs are the owners in right, title, and interest in and to multiple United States patents and patent applications, including U.S. Patent No. 9,779,418 (the "418 Patent"), U.S. Patent No. 10,049,387 (the "387 Patent"), and U.S. Patent No. 10,984,447 (the "447 Patent") (collectively, the "Asserted Patents"). The Asserted Patents are valid and enforceable, and the inventions claimed in the Asserted Patents were novel, non-obvious, unconventional, and non-routine at least as of May 1, 2009.

20. The '418 Patent, entitled "Exclusive Delivery of Content within Geographic Areas," was duly and legally issued to inventors Ryan Hardin and Andrew Hill on October 3, 2017. Plaintiffs own the entire right, title, and interest in the '418 Patent and are entitled to sue for past and future infringement. A true and correct copy of the '418 Patent is attached as Exhibit A.

21. The '387 Patent, entitled "Exclusive Delivery of Content within Geographic Areas," was duly and legally issued to inventors Ryan Hardin and Andrew Hill on August 14, 2018. Plaintiffs own the entire right, title, and interest in the '387 Patent and are entitled to sue for past and future infringement. A true and correct copy of the '387 Patent is attached as Exhibit B.

22. The '447 Patent, entitled "Exclusive Delivery of Content within Geographic Areas," was duly and legally issued to inventors Ryan Hardin and Andrew Hill on April 20, 2021. Plaintiffs own the entire right, title, and interest in the '447 Patent and are entitled to sue for past and future infringement. A true and correct copy of the '447 Patent is attached as Exhibit C.

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OVERVIEW OF THE INVENTIONS

23. Mobile applications ("mobile apps" or "apps") are computer programs designed to run on mobile devices. The advent and proliferation of apps for mobile devices significantly increased the opportunities for providing content to device users. In particular, the ability of mobile phones to monitor and make decisions based on the dynamic location of the user created additional opportunities for providing location-based content, including advertisements and data or information.

24. Apps had no precise analog in physical media such as newspapers or magazines. Nor did physical media have the ability to determine a person's location and proximity to other points of interest at any given time, such as when a user is moving from one location to another, or the length of time that a user spends in a certain location. Indeed, the location of a mobile device may change rapidly depending on, for example, whether the user is stationary or in a moving vehicle.

25. With these new opportunities came new technological challenges, including how to enable location-dependent features and functionality for apps on a mobile device while constrained by the limited computing power and storage of a mobile device. For instance, location information can be obtained by apps on a mobile device in a number of suitable ways, including using a Global Positioning System (GPS) component on the mobile device. One way would be for each app to communicate with the GPS component to determine the location of the mobile device and deliver location-dependent content. Each app requiring location information would need to be configured to independently obtain location information. As such, if, for example, 10

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mobile apps polled a GPS component for a location, the GPS component would need to obtain location information (e.g., through satellites) 10 different times.

26. However, given that mobile devices may include dozens of apps installed and simultaneously running on a mobile device, having apps independently requesting location information would be processor intensive and not scalable, especially for the mobile device to efficiently allow multitasking when several apps are simultaneously running in the foreground/background. This implementation could tie up the limited resources available on the mobile phone and also deplete the mobile phone's battery at a faster rate.

27. Plaintiffs invented a technological solution that solves these technical problems by implementing a centralized service on a mobile device for tracking and monitoring the location of the mobile device on behalf of apps on the mobile device. Apps can register with the centralized service to receive its benefits. The claimed inventions provide a mechanism whereby an app can register with the centralized service and request to be notified about events relating to a particular geographic area of interest, which is defined by a virtual perimeter. One kind of geographic area of interest is now commonly referred to as a "geofence" (the term is used herein as an exemplary geographic area of interest but not to suggest exact equivalence of the terms). As part of the request to be notified about events relating to a particular geofence, an app provides a unique identifier corresponding to the app and a geofence. The centralized service receives and stores identifiers to keep track of app/geofence pairings for registered apps. The centralized service monitors the location of the mobile device and alerts the appropriate app(s), based on the identifier, when there is an event associated with a particular geofence (e.g., when the mobile device enters or exits a geofence registered to one or more apps on the mobile device, when the mobile device remains in

a geofence for a predetermined amount of time). The alert from the centralized service includes the identifier provided by the app. Apps can advantageously limit the frequency of alerts received from the centralized service by increasing the amount of time the mobile device must remain within a particular area before an alert is triggered. In response to the alert, the app can, for example, display location-based information for the user. As such, for example, individual apps are able to customize information that is shown based on the mobile device's location, including based on the mobile device moving to a different location and/or the duration it remains within a particular area. Notably, defining alerts and triggering content delivery based on geofence events was not feasible for physical media such as newspapers and the like, which cannot respond to dynamic movement.

28. By offloading the polling and monitoring of the mobile device's location from the individual apps to the centralized service, the claimed inventions improve the overall functioning of the mobile devices as well as the individual apps. As a result, the claimed inventions improve the overall functioning of the mobile device itself by increasing processing efficiency and reducing battery drain, as well as the functioning of the individual apps, especially when several apps are running simultaneously in the foreground or background. Revisiting the example described above, the centralized service could meet the needs of 10 apps by obtaining location information once for all of the apps. The centralized service, which is separate from the apps on the mobile device, could be a part of the operating system (OS) of the mobile device or it may be a separate component of the mobile device. Further, by using a centralized service, the individual apps can take advantage of any additional information known to the mobile device (e.g., sensor data such as an accelerometer, cell tower data, etc.), thereby improving the functionality of the device and apps.

COUNT I: CLAIM FOR PATENT INFRINGEMENT OF THE '418 PATENT

29. Plaintiffs repeat and reallege the allegations in paragraphs 1-28 as if fully set forth herein.

30. LG has infringed, contributed to the infringement of, and/or induced infringement of the '418 Patent by making, using, selling, offering for sale, or importing into the United States, or by intending that others make, use, import into, offer for sale, or sell in the United States, products and/or methods covered by one or more claims of the '418 Patent including, but not limited to, mobile devices and components thereof.

31. Upon information and belief, LG's mobile devices, including smartphones and tablets, that infringe one or more claims of the '418 Patent include at least the following products, as well as products with reasonably similar functionality:

- LG G series, LG K series, LG Q series, LG V series, LG W series, LG X series, LG Aristo series, LG Nexus series, LG Stylo series, LG Velvet series, LG Escape series, LG Arena series, LG Prime series, LG Tribute series, LG Fortune series, LG Grace series, LG Harmony series, LG Journey series, LG Neon series, LG Phoenix series, LG Premier series, LG Rebel series, LG Risio series, LG Solo series, LG Transpyre series, LG Zone series, and LG Wing series cell phones; and
- LG G Pad series tablets.

Upon information and belief, these products are offered in several varieties, including different options for size, display, processor, storage, and battery. The products listed are exemplary, and Plaintiffs will be able to provide a more comprehensive list after discovery. Upon information and

belief, LG also infringes one or more claims of the '418 Patent through its use of geofencing or location information in its advertising or content delivery efforts or its own applications it develops.

32. For example, upon information and belief, LG's mobile devices infringe at least claim 11 of the '418 Patent. LG makes, uses, sells, offers for sale, imports, exports, supplies, or distributes within the United States its mobile devices and thus directly infringes the '418 Patent.

33. LG indirectly infringes the '418 Patent as provided by 35 U.S.C. § 271(b) by inducing infringement by others, such as manufacturers, resellers, and end-user customers in this District and throughout the United States. For example, direct infringement is the result of activities performed by manufacturers, resellers, or operators/carriers of LG's mobile devices, who, upon information and belief, perform each step of the claimed invention as directed by LG. LG received actual notice of the '418 Patent at least as early as the filing of this Complaint.

34. Upon information and belief, LG's affirmative acts of selling LG's mobile devices, causing LG's mobile devices to be manufactured, and providing directions, instructions, schematics, diagrams, or designs to its manufacturers, resellers, or operators/carriers to make or use LG's mobile devices in a manner that directly infringes the '418 Patent induce infringement by others, such as manufacturers, resellers, or operators/carriers in this District and throughout the United States. Upon information and belief, through its manufacture and sales of LG's mobile devices, LG performed the acts that constitute induced infringement with knowledge or willful blindness that the induced acts would constitute infringement.

35. LG also indirectly infringes the '418 Patent by contributing to infringement by others, such as manufacturers, resellers, and operators/carriers, in accordance with 35 U.S.C. §

271(c) in this District and throughout the United States. Upon information and belief, direct infringement is the result of activities performed by manufacturers, resellers, or operators/carriers of LG's mobile devices.

36. Upon information and belief, LG's affirmative acts of selling LG's mobile devices and causing LG's mobile devices to be manufactured and sold contribute to LG's manufacturers, resellers, and operators/carriers making or using LG's mobile devices in a normal and customary way that infringes the '418 Patent. Upon information and belief, LG's mobile devices constitute the material part of Plaintiffs' patented invention, have no substantial non-infringing uses, and are known by LG to be especially made or especially adapted for use to infringe the '418 Patent.

37. LG provides a mobile device comprising: memory, at least one processor operably coupled to the memory, a location-determination component tangibly embodied in the mobile device for determining the mobile device's physical geographic location, and at least one module stored in the memory and configured for execution by the at least one processor, including as demonstrated in the exemplary text and images below:





https://www.lg.com/us





https://www.lg.com/us/cell-phones/lg-lmv600tmlatmocb-tmobile-v60-thinq-5g https://www.lg.com/us/support/products/documents/Specs_LG_V60_ThinQ_TMUS_0310%20(1).pdf

38. LG provides a mobile device, wherein the at least one module comprises instructions for: implementing, on the mobile device, at least one computer readable program instruction, made available for use by one or more distinct application programs operating on the mobile device, for receiving, from a particular one application program of the one or more distinct application programs during the particular one application program's execution on the mobile device, a request to reserve, for the particular one application program, at least one designated geographic area of interest for having a particular associated identifier exclusively provided for use by the particular one application program after it is determined, by at least use of the at least one processor and of location information representing a physical geographic location of the mobile device as determined by the location-determination component, that the mobile device has at least entered the at least one designated geographic area of interest, wherein the at least one computer readable program instruction comprises at least one input parameter for receiving, from

the particular one application program, data representing a) the particular associated identifier as provided content associated with the at least one designated geographic area of interest and exclusively related to the particular one application program, and b) a perimeter definition defining, with at least reference to longitude and latitude, the at least one designated geographic area of interest, and wherein the one or more distinct application programs each comprises a system of executable coded instructions as programmed by at least one developer for execution on the mobile device, including as demonstrated in the exemplary text and images below:

Create and monitor geofences $\hfill\square$

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.



This lesson shows you how to add and remove geofences, and then listen for geofence transitions using a **BroadcastReceiver**.







```
Define a broadcast receiver for geofence transitions
An Intent sent from Location Services can trigger various actions in your app, but you should not have it start an
activity or fragment, because components should only become visible in response to a user action. In many cases, a
BroadcastReceiver is a good way to handle a geofence transition. A BroadcastReceiver gets updates when an
event occurs, such as a transition into or out of a geofence, and can start long-running background work.
The following snippet shows how to define a PendingIntent that starts a BroadcastReceiver :
   Kotlin
             Java
                                                                                                     0
   public class MainActivity extends AppCompatActivity {
       // ...
       private PendingIntent getGeofencePendingIntent() {
           // Reuse the PendingIntent if we already have it.
           if (geofencePendingIntent != null) {
               return geofencePendingIntent;
           }
           Intent intent = new Intent(this, GeofenceBroadcastReceiver.class);
           // We use FLAG_UPDATE_CURRENT so that we get the same pending intent back when
           // calling addGeofences() and removeGeofences().
           geofencePendingIntent = PendingIntent.getBroadcast(this, 0, intent, PendingIntent.
                   FLAG_UPDATE_CURRENT);
           return geofencePendingIntent;
       }
```

```
Add geofences
To add geofences, use the GeofencingClient.addGeofences() method. Provide the GeofencingRequest object, and
the PendingIntent. The following snippet demonstrates processing the results:
   Kotlin
              Java
                                                                                                   0 D
   geofencingClient.addGeofences(getGeofencingRequest(), getGeofencePendingIntent())
           .addOnSuccessListener(this, new OnSuccessListener<Void>() {
               @Override
               public void onSuccess(Void aVoid) {
                   // Geofences added
                   // ...
           })
           .addOnFailureListener(this, new OnFailureListener() {
               @Override
               public void onFailure(@NonNull Exception e) {
                   // Failed to add geofences
                   // ...
           });
```

https://developer.android.com/training/location/geofencing

39. LG provides a mobile device, wherein the at least one module comprises instructions for: receiving, using the at least one computer readable program instruction, from a first particular application program during its execution on the mobile device, a first request for a reservation for a first particular designated geographic area of interest for having a first particular associated identifier exclusively provided for use by the first particular application program after it is determined that the mobile device has at least entered the first particular designated geographic area of interest, wherein the first request comprises data representing a) the first particular associated identifier, represented by a data string, as provided content by the first particular application program to be associated with the first particular designated geographic area of interest and exclusively related to the first particular application program, and b) a first perimeter definition

provided by the first particular application program, wherein the first perimeter definition comprises at least data representing a first latitude and longitude coordinate and a first radius value for defining the first particular designated geographic area of interest, including as demonstrated in the exemplary text and images below:

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.



This lesson shows you how to add and remove geofences, and then listen for geofence transitions using a **BroadcastReceiver**.





```
Add geofences
To add geofences, use the GeofencingClient.addGeofences() method. Provide the GeofencingRequest object, and
the PendingIntent. The following snippet demonstrates processing the results:
   Kotlin
             Java
                                                                                                   10
   geofencingClient.addGeofences(getGeofencingRequest(), getGeofencePendingIntent())
           .addOnSuccessListener(this, new OnSuccessListener<Void>() {
               @Override
               public void onSuccess(Void aVoid) {
                   // Geofences added
                   // ...
               }
           })
           .addOnFailureListener(this, new OnFailureListener() {
               @Override
               public void onFailure(@NonNull Exception e) {
                   // Failed to add geofences
                   // ...
               }
           });
```

https://developer.android.com/training/location/geofencing

40. LG provides a mobile device, wherein the at least one module comprises instructions for: determining availability for the first particular designated geographic area of interest to be reserved for the first particular application program, including as demonstrated in the exemplary text and images below:



https://developer.android.com/training/location/geofencing

GeofenceStatusCodes					
Geofence specific status codes, for use in <pre>StatusCode()</pre>					
Constant Summary					
int	GEOFENCE_INSUFFICIENT_LOCATION_PERMISSION	The client doesn't have sufficient location permission to perform geofencing operations.			
int	GEOFENCE_NOT_AVAILABLE	Geofence service is not available now.			
int	GEOFENCE_REQUEST_TOO_FREQUENT	Your app has been adding Geofences too frequently.			
int	GEOFENCE_TOO_MANY_GEOFENCES	Your app has registered more than 100 geofences.			
int	GEOFENCE_TOO_MANY_PENDING_INTENTS	You have provided more than 5 different PendingIntents to the GeofencingApi.addGeofences(GoogleApiClient, GeofencingRequest, PendingIntent) call.			

https://developers.google.com/android/reference/com/google/android/gms/location/GeofenceStat usCodes 41. LG provides a mobile device, wherein the at least one module comprises instructions for: using the first perimeter definition in conjunction with the first particular associated identifier to establish the first particular designated geographic area of interest in the first request as an area reserved for first content related to the first particular application program and not an area reserved for first content related to other application programs, wherein the first content related to the first particular application program comprises the first particular associated identifier, including as demonstrated in the exemplary text and images below:

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.



This lesson shows you how to add and remove geofences, and then listen for geofence transitions using a **BroadcastReceiver**.

```
Create and add geofences
Your app needs to create and add geofences using the location API's builder class for creating Geofence objects, and the
convenience class for adding them. Also, to handle the intents sent from Location Services when geofence transitions
occur, you can define a PendingIntent as shown in this section.
   ★ Note: On single-user devices, there is a limit of 100 geofences per app. For multi-user devices, the limit is 100 geofences per
       app per device user.
Create geofence objects
First, use Geofence. Builder to create a geofence, setting the desired radius, duration, and transition types for the
geofence. For example, to populate a list object:
   Kotlin
              Java
                                                                                                          1
   geofenceList.add(new Geofence.Builder()
       // Set the request ID of the geofence. This is a string to identify this
       // geofence.
       .setRequestId(entry.getKey())
       .setCircularRegion(
               entry.getValue().latitude,
                entry.getValue().longitude,
               Constants.GEOFENCE_RADIUS_IN_METERS
       )
       .setExpirationDuration(Constants.GEOFENCE_EXPIRATION_IN_MILLISECONDS)
       .setTransitionTypes(Geofence.GEOFENCE_TRANSITION_ENTER |
               Geofence.GEOFENCE_TRANSITION_EXIT)
       .build());
This example pulls data from a constants file. In actual practice, apps might dynamically create geofences based on the
```

user's location.



```
Add geofences
To add geofences, use the GeofencingClient.addGeofences() method. Provide the GeofencingRequest object, and
the PendingIntent. The following snippet demonstrates processing the results:
   Kotlin
              Java
                                                                                                   0 D
   geofencingClient.addGeofences(getGeofencingRequest(), getGeofencePendingIntent())
           .addOnSuccessListener(this, new OnSuccessListener<Void>() {
               @Override
               public void onSuccess(Void aVoid) {
                   // Geofences added
                   // ...
           })
           .addOnFailureListener(this, new OnFailureListener() {
               @Override
               public void onFailure(@NonNull Exception e) {
                   // Failed to add geofences
                   // ...
           });
```

https://developer.android.com/training/location/geofencing

42. LG provides a mobile device, wherein the at least one module comprises instructions for: storing, in the memory, in response to receiving the first request, after availability for the first particular designated geographic area of interest to be reserved for the first particular application program has been positively determined, an at least first record, for the first particular application program, associated with the first particular associated identifier and the first particular designated geographic area of interest, thereby designating the first particular application program as a first one of the one or more registered application programs on the mobile device, wherein the one or more registered application programs on the mobile device each consists of an application program designated for having a particular identifier, being associated with a particular reserved geographic area of interest, to be exclusively provided for use by said application program after it

is determined, by at least use of the at least one processor and of the location information, that the mobile device has at least entered said particular reserved geographic area of interest, including as demonstrated in the exemplary text and images below:

Platform: Android [™] 10 Processor: Qualcomm Snapdragon [™] 865 Octa-core (up to 3 × 2.4 GHz + 1 × 2.8 GHz + 4 × 1.8 GHz) Battery Capacity: 5000 mAh (Non-Removable) Talk Time: up to 2.1 hours ¹ Standby Time: up to 590 hours ¹	 Charging: USB Type-C" port; wireless charging"; Qualcomm Quick Charge" 4.0+ Internal Memory: 128 GB (up to 98.8 GB usable)³ microSD": supports card up to 2 TB (cards sold separately) RAM: 8 GB Hearing Aids: Rated for M4, T4

https://www.lg.com/us/cell-phones/lg-lmv600tmlatmocb-tmobile-v60-thinq-5g https://www.lg.com/us/support/products/documents/Specs_LG_V60_ThinQ_TMUS_0310%20(1_).pdf

Add geofences				
To add geofences, use the GeofencingClient.addGeofences() method. Provide the GeofencingRequest object, and he PendingIntent. The following snippet demonstrates processing the results:				object, and
Kotlin Java				
<pre>geofencingClient. .addOnSuc @Over publi / } .addOnFai @Over publi / / } });</pre>	addGeofences(getGeofencingRequest(cessListener(this, new OnSuccessLi ride c void onSuccess(Void aVoid) { / Geofences added / lureListener(this, new OnFailureLi ride c void onFailure(@NonNull Exception / Failed to add geofences /	(), getGeofencePend istener <void>() { istener() { on e) {</void>	dingIntent())	€ ⊡

https://developer.android.com/training/location/geofencing

GeofencingClient					
The main entry point for interacting with the geofencing APIs.					
Get an instance of this client via LocationServices.getGeofencingClient(Activity).					
All methods are th	All methods are thread safe.				
Dublic Motherd	Summer and the second se				
Public Method	Summary				
Task <void> add Set</void>	ask <void> addGeofences(GeofencingRequest geofencingRequest, PendingIntent pendingIntent) Sets alerts to be notified when the device enters or exits one of the specified geofences.</void>				
Task <void> rem Rem</void>	removeGeofences(List <string> geofenceRequestIds) Removes geofences by their request IDs.</string>				
Task <void> rem Rem</void>	<pre>noveGeofences(PendingIntent pendingIntent) noves all geofences associated with the given pendingIntent.</pre>				
public Task <void< td=""><td>addGeofences (GeofencingRequest geofencingRequest, PendingIntent pendingIntent)</td></void<>	addGeofences (GeofencingRequest geofencingRequest, PendingIntent pendingIntent)				
Sets alerts to be notified when the device enters or exits one of the specified geofences. If an existing geofence with the same request ID is already registered, the old geofence is replaced by the new one, and the new PendingIntent is used to generate intents for alerts.					
Task is completed when geofences are successfully added or failed to be added. Upon failure, an ApiException will be set on the Task. Refer to GeofenceStatusCodes for possible errors when adding geofences.					
When a geofence transition (for example, entering or exiting) matches one of the transition filter (see Geofence.Builder.setTransitionTypes(int)) in the given geofence list, an intent is generated using the given pending intent. You can call GeofencingEvent.fromIntent(android.content.Intent) to get the transition type, geofences that triggered this intent and the location that triggered the geofence transition.					
In case network location provider is disabled by the user, the geofence service will stop updating, all registered geofences will be removed and an intent is generated by the provided pending intent. In this case, the GeofencingEvent created from this intent represents an error event, where GeofencingEvent.hasError() returns true and GeofencingEvent.getErrorCode() returns GeofenceStatusCodes.GEOFENCE_NOT_AVAILABLE .					
This method requir	This method requires Manifest.permission.ACCESS_FINE_LOCATION.				
Parameters					
geofencingRequest	geofencing request that include a list of geofences to be added and related triggering behavior. The request must be created using GeofencingRequest.Builder.				
pendingIntent a pending intent that will be used to generate an intent when matched geofence transition is observed					
Throws					
SecurityException	if the app does not have Manifest.permission.ACCESS_FINE_LOCATION permission				
NullPointerExceptio	n if geofencingRequest or pendingIntent is null				

https://developers.google.com/android/reference/com/google/android/gms/location/GeofencingC lient.html

Handle geofence transitions

When Location Services detects that the user has entered or exited a geofence, it sends out the Intent contained in the PendingIntent you included in the request to add geofences. A broadcast receiver like GeofenceBroadcastReceiver notices that the Intent was invoked and can then obtain the geofencing event from the intent, determine the type of Geofence transition(s), and determine which of the defined geofences was triggered. The broadcast receiver can direct an app to start performing background work or, if desired, send a notification as output.



https://developer.android.com/training/location/geofencing

43. LG provides a mobile device, wherein the at least one module comprises instructions for: receiving, using the at least one computer readable program instruction, from a second particular application program during its execution on the mobile device, a second request for a reservation for a second particular designated geographic area of interest for having a second particular associated identifier exclusively provided for use by the second particular application program after it is determined that the mobile device has at least entered the second particular designated geographic area of interest, wherein the second request comprises data representing a) the second particular associated identifier, represented by a data string, as provided content by the second particular application program to be associated with the second particular designated geographic area of interest and exclusively related to the second particular application program, and b) a second perimeter definition provided by the second particular application program, wherein the second particular application program, and b) a second perimeter definition comprises at least data representing a second latitude and longitude coordinate and a second radius value for defining the second particular designated geographic area of interest, including as demonstrated in the exemplary text and images below:

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.






https://developer.android.com/training/location/geofencing

// Failed to add geofences

.addOnFailureListener(this, new OnFailureListener() {

public void onFailure(@NonNull Exception e) {

// ...

// ...

@Override

}
})

});

44. LG provides a mobile device, wherein the at least one module comprises instructions for: determining availability for the second particular designated geographic area of interest to be reserved for the second particular application program, including as demonstrated in the exemplary text and images below:

Add geofences	
To add geofences, use the GeofencingClient.addGeofences() method. Provide the GeofencingRequest object the PendingIntent. The following snippet demonstrates processing the results:	, and
Kotlin Java	
<pre>geofencingClient.addGeofences(getGeofencingRequest(), getGeofencePendingIntent()) .addOnSuccessListener(this, new OnSuccessListener<void>() { @Override public void onSuccess(Void aVoid) { // Geofences added // } }) .addOnFailureListener(this, new OnFailureListener() { @Override public void onFailure(@NonNull Exception e) { // Failed to add geofences // } }); </void></pre>	•

https://developer.android.com/training/location/geofencing

Geo public fina	fenceStatusCodes	usCodes
Geofence	e specific status codes, for use in Status.getStatus	Code()
Consta	nt Summary	
int	GEOFENCE_INSUFFICIENT_LOCATION_PERMISSION	The client doesn't have sufficient location permission to perform geofencing operations.
int	GEOFENCE_NOT_AVAILABLE	Geofence service is not available now.
int	GEOFENCE_REQUEST_TOO_FREQUENT	Your app has been adding Geofences too frequently.
int	GEOFENCE_TOO_MANY_GEOFENCES	Your app has registered more than 100 geofences.
int	GEOFENCE_TOO_MANY_PENDING_INTENTS	You have provided more than 5 different PendingIntents to the GeofencingApi.addGeofences(GoogleApiClient, GeofencingRequest, PendingIntent) call.

https://developers.google.com/android/reference/com/google/android/gms/location/GeofenceStat usCodes

45. LG provides a mobile device, wherein the at least one module comprises instructions for: using the second perimeter definition in conjunction with the second particular associated identifier to establish the second particular designated geographic area of interest in the second request as an area reserved for second content related to the second particular application program and not an area reserved for second content related to other application programs, wherein the second content related to the second particular application programs the second particular application program comprises the second particular application program comprises the second particular associated identifier, including as demonstrated in the exemplary text and images below:

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.







```
Add geofences
```

To add geofences, use the GeofencingClient.addGeofences() method. Provide the GeofencingRequest object, and the PendingIntent. The following snippet demonstrates processing the results:

```
Kotlin
          Java
                                                                                              0 🗘
geofencingClient.addGeofences(getGeofencingRequest(), getGeofencePendingIntent())
        .addOnSuccessListener(this, new OnSuccessListener<Void>() {
           @Override
            public void onSuccess(Void aVoid) {
               // Geofences added
                // ...
            }
        })
        .addOnFailureListener(this, new OnFailureListener() {
           @Override
            public void onFailure(@NonNull Exception e) {
               // Failed to add geofences
                // ...
        });
```

https://developer.android.com/training/location/geofencing

46. LG provides a mobile device, wherein the at least one module comprises instructions for: storing, in the memory, in response to receiving the second request, after availability for the second particular designated geographic area of interest to be reserved for the second particular application program has been positively determined, an at least second record, for the second particular application program, associated with the second particular associated identifier and the second particular designated geographic area of interest, thereby designating the second particular application program as a second one of the one or more registered application programs on the mobile device, including as demonstrated in the exemplary text and images below:

Platform: Android "10 Processor: Qualcomm Snapdragon™ 865 Octa-core (up to 3x 2.4 GHz + 1x 28 GHz + 4x 1.8 GHz) Battery Capacity; 5000 mAh (Non-Removable) Talk Time: up to 21 hours¹ Standby Time: up to 590 hours¹ Actual battery three may very depending on network connectivity and explications use. 2 Wheles there and explicitly: 3 Uaddle memory varies depending on tothware version and ustrags. https://www.lg.com/us/cell-phones/lg-Imv600tmlatmocb-tmobile-v60-thinq-5g https://www.lg.com/us/support/products/documents/Specs LG V60 ThinQ TMUS 0310%20(1



```
https://developer.android.com/training/location/geofencing
```



public Task <void></void>	addGeofences (GeofencingRequest geofencingRequest, PendingIntent pendingIntent)
Sets alerts to be no same request ID is to generate intents	tified when the device enters or exits one of the specified geofences. If an existing geofence with the already registered, the old geofence is replaced by the new one, and the new PendingIntent is used for alerts.
Task is completed be set on the Task	when geofences are successfully added or failed to be added. Upon failure, an ApiException will . Refer to GeofenceStatusCodes for possible errors when adding geofences.
When a geofence tr Geofence.Builder pending intent. You geofences that trigg	ansition (for example, entering or exiting) matches one of the transition filter (see .setTransitionTypes(int)) in the given geofence list, an intent is generated using the given can call GeofencingEvent.fromIntent(android.content.Intent) to get the transition type, gered this intent and the location that triggered the geofence transition.
In case network loc geofences will be re created from this in GeofencingEvent This method require Parameters	ation provider is disabled by the user, the geofence service will stop updating, all registered emoved and an intent is generated by the provided pending intent. In this case, the GeofencingEvent tent represents an error event, where GeofencingEvent.hasError() returns true and .getErrorCode() returns GeofenceStatusCodes.GEOFENCE_NOT_AVAILABLE. Manifest.permission.ACCESS_FINE_LOCATION.
geofencingRequest	geofencing request that include a list of geofences to be added and related triggering behavior. The request must be created using GeofencingRequest.Builder.
pendingIntent	a pending intent that will be used to generate an intent when matched geofence transition is observed
Throws	
SecurityException	if the app does not have Manifest.permission.ACCESS_FINE_LOCATION permission
NullPointerException	if geofencingRequest or pendingIntent is null
nttps://developer	s.google.com/android/reference/com/google/android/gms/location/GeofencingC

<u>lient.html</u>

Handle geofence transitions

When Location Services detects that the user has entered or exited a geofence, it sends out the Intent contained in the PendingIntent you included in the request to add geofences. A broadcast receiver like GeofenceBroadcastReceiver notices that the Intent was invoked and can then obtain the geofencing event from the intent, determine the type of Geofence transition(s), and determine which of the defined geofences was triggered. The broadcast receiver can direct an app to start performing background work or, if desired, send a notification as output.

The following snippet shows how to define a **BroadcastReceiver** that posts a notification when a geofence transition occurs. When the user clicks the notification, the app's main activity appears:

```
Kotlin
             Java
                                                                                                    10
  class GeofenceBroadcastReceiver : BroadcastReceiver() {
      // ...
      override fun onReceive(context: Context?, intent: Intent?) {
           val geofencingEvent = GeofencingEvent.fromIntent(intent)
           if (geofencingEvent.hasError()) {
               val errorMessage = GeofenceStatusCodes
                       .getStatusCodeString(geofencingEvent.errorCode)
              Log.e(TAG, errorMessage)
               return
           }
           // Get the transition type.
           val geofenceTransition = geofencingEvent.geofenceTransition
           // Test that the reported transition was of interest.
           if (geofenceTransition == Geofence.GEOFENCE_TRANSITION_ENTER |
                   geofenceTransition == Geofence.GEOFENCE_TRANSITION_EXIT) {
               // Get the geofences that were triggered. A single event can trigger
               // multiple geofences.
               val triggeringGeofences = geofencingEvent.triggeringGeofences
               // Get the transition details as a String.
               val geofenceTransitionDetails = getGeofenceTransitionDetails(
                       this.
                       geofenceTransition.
                       triggeringGeofences
               )
               // Send notification and log the transition details.
               sendNotification(geofenceTransitionDetails)
               Log.i(TAG, geofenceTransitionDetails)
           } else {
               // Log the error.
               Log.e(TAG, getString(R.string.geofence_transition_invalid_type,
                       geofenceTransition))
          }
      }
  }
After detecting the transition event via the PendingIntent, the BroadcastReceiver gets the geofence transition type
and tests whether it is one of the events the app uses to trigger notifications -- either GEOFENCE_TRANSITION_ENTER or
GEOFENCE_TRANSITION_EXIT in this case. The service then sends a notification and logs the transition details.
```

https://developer.android.com/training/location/geofencing

47. LG provides a mobile device, wherein the at least one module comprises instructions for: selecting the first particular associated identifier associated with the at least first record stored in the memory to be provided for use by the first one of the one or more registered application programs on the mobile device after it is determined, by at least use of the at least one processor, of the location information, and of the first particular designated geographic area of interest associated with the at least first record stored in the memory for the first one of the one or more registered application programs on the mobile device, that the mobile device has at least entered the first particular designated geographic area of interest associated with the at least geographic area of interest associated with the at least first record stored in the memory for the first one of the one or more registered application programs on the mobile device, that the mobile device has at least entered the first particular designated geographic area of interest associated with the at least first record stored in the memory and has remained therein for at least a first designated length of time, including as demonstrated in the exemplary text and images below:

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.





Handle geofence transitions

When Location Services detects that the user has entered or exited a geofence, it sends out the Intent contained in the PendingIntent you included in the request to add geofences. A broadcast receiver like GeofenceBroadcastReceiver notices that the Intent was invoked and can then obtain the geofencing event from the intent, determine the type of Geofence transition(s), and determine which of the defined geofences was triggered. The broadcast receiver can direct an app to start performing background work or, if desired, send a notification as output.

The following snippet shows how to define a **BroadcastReceiver** that posts a notification when a geofence transition occurs. When the user clicks the notification, the app's main activity appears:

```
Kotlin
             Java
                                                                                                    10
   class GeofenceBroadcastReceiver : BroadcastReceiver() {
       // ...
      override fun onReceive(context: Context?, intent: Intent?) {
           val geofencingEvent = GeofencingEvent.fromIntent(intent)
           if (geofencingEvent.hasError()) {
               val errorMessage = GeofenceStatusCodes
                       .getStatusCodeString(geofencingEvent.errorCode)
               Log.e(TAG, errorMessage)
               return
           }
           // Get the transition type.
           val geofenceTransition = geofencingEvent.geofenceTransition
           // Test that the reported transition was of interest.
           if (geofenceTransition == Geofence.GEOFENCE_TRANSITION_ENTER |
                   geofenceTransition == Geofence.GEOFENCE_TRANSITION_EXIT) {
               // Get the geofences that were triggered. A single event can trigger
               // multiple geofences.
               val triggeringGeofences = geofencingEvent.triggeringGeofences
               // Get the transition details as a String.
               val geofenceTransitionDetails = getGeofenceTransitionDetails(
                       this.
                       geofenceTransition,
                       triggeringGeofences
               )
               // Send notification and log the transition details.
               sendNotification(geofenceTransitionDetails)
               Log.i(TAG, geofenceTransitionDetails)
           } else {
               // Log the error.
               Log.e(TAG, getString(R.string.geofence_transition_invalid_type,
                       geofenceTransition))
           }
       }
   }
After detecting the transition event via the PendingIntent, the BroadcastReceiver gets the geofence transition type
and tests whether it is one of the events the app uses to trigger notifications -- either GEOFENCE_TRANSITION_ENTER or
GEOFENCE_TRANSITION_EXIT in this case. The service then sends a notification and logs the transition details.
```

Use the dwell transition type to reduce alert spam

If you receive a large number of alerts when driving briefly past a geofence, the best way to reduce the alerts is to use a transition type of **GEOFENCE_TRANSITION_DWELL** instead of **GEOFENCE_TRANSITION_ENTER**. This way, the dwelling alert is sent only when the user stops inside a geofence for a given period of time. You can choose the duration by setting a loitering delay.

https://developer.android.com/training/location/geofencing

48. LG provides a mobile device, wherein the at least one module comprises instructions for: selecting the second particular associated identifier associated with the at least second record stored in the memory to be provided for use by the second one of the one or more registered application programs on the mobile device after it is determined, by at least use of the at least one processor, of the location information, and of the second particular designated geographic area of interest associated with the at least second record stored in the memory for the second one of the one or more registered application programs on the mobile device application programs on the mobile device, that the second one of the one or more registered application programs on the mobile device, that the mobile device has at least entered the second particular designated geographic area of interest associated with the at least second record stored in the memory and has remained therein for at least a second designated length of time, including as demonstrated in the exemplary text and images below:

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.





Handle geofence transitions

When Location Services detects that the user has entered or exited a geofence, it sends out the Intent contained in the PendingIntent you included in the request to add geofences. A broadcast receiver like GeofenceBroadcastReceiver notices that the Intent was invoked and can then obtain the geofencing event from the intent, determine the type of Geofence transition(s), and determine which of the defined geofences was triggered. The broadcast receiver can direct an app to start performing background work or, if desired, send a notification as output.

The following snippet shows how to define a **BroadcastReceiver** that posts a notification when a geofence transition occurs. When the user clicks the notification, the app's main activity appears:

```
Kotlin
             Java
                                                                                                    10
   class GeofenceBroadcastReceiver : BroadcastReceiver() {
       // ...
      override fun onReceive(context: Context?, intent: Intent?) {
           val geofencingEvent = GeofencingEvent.fromIntent(intent)
           if (geofencingEvent.hasError()) {
               val errorMessage = GeofenceStatusCodes
                       .getStatusCodeString(geofencingEvent.errorCode)
               Log.e(TAG, errorMessage)
               return
           }
           // Get the transition type.
           val geofenceTransition = geofencingEvent.geofenceTransition
           // Test that the reported transition was of interest.
           if (geofenceTransition == Geofence.GEOFENCE_TRANSITION_ENTER |
                   geofenceTransition == Geofence.GEOFENCE_TRANSITION_EXIT) {
               // Get the geofences that were triggered. A single event can trigger
               // multiple geofences.
               val triggeringGeofences = geofencingEvent.triggeringGeofences
               // Get the transition details as a String.
               val geofenceTransitionDetails = getGeofenceTransitionDetails(
                       this.
                       geofenceTransition,
                       triggeringGeofences
               )
               // Send notification and log the transition details.
               sendNotification(geofenceTransitionDetails)
               Log.i(TAG, geofenceTransitionDetails)
           } else {
               // Log the error.
               Log.e(TAG, getString(R.string.geofence_transition_invalid_type,
                       geofenceTransition))
           }
       }
   }
After detecting the transition event via the PendingIntent, the BroadcastReceiver gets the geofence transition type
and tests whether it is one of the events the app uses to trigger notifications -- either GEOFENCE_TRANSITION_ENTER or
GEOFENCE_TRANSITION_EXIT in this case. The service then sends a notification and logs the transition details.
```

Use the dwell transition type to reduce alert spam

If you receive a large number of alerts when driving briefly past a geofence, the best way to reduce the alerts is to use a transition type of **GEOFENCE_TRANSITION_DWELL** instead of **GEOFENCE_TRANSITION_ENTER**. This way, the dwelling alert is sent only when the user stops inside a geofence for a given period of time. You can choose the duration by setting a loitering delay.

https://developer.android.com/training/location/geofencing

49. LG provides a mobile device, wherein the at least one module comprises instructions for: providing, to the first one of the one or more registered application programs on the mobile device, at least the first particular associated identifier from its selecting in response to receiving, from the first one of the one or more registered application programs on the mobile device, a request to receive content, including as demonstrated in the exemplary text and images

below:

An Intent sent from Location Services can trigger various actions in your app, but you should <i>not</i> have it start an activity or fragment, because components should only become visible in response to a user action. In many cases, a BroadcastReceiver is a good way to handle a geofence transition. A BroadcastReceiver gets updates when an		
An Intent sent from Location Services can trigger various actions in your app, but you should <i>not</i> have it start an activity or fragment, because components should only become visible in response to a user action. In many cases, a BroadcastReceiver is a good way to handle a geofence transition. A BroadcastReceiver gets updates when an event occurs, such as a transition into or out of a geofence, and can start long-running background work.		
The following snippet shows how to define a PendingIntent that starts a BroadcastReceiver :		
Kotlin Java		
public class MainActivity extends AppCompatActivity {		
//		
<pre>private PendingIntent getGeofencePendingIntent() { // Reuse the PendingIntent if we already have it. if (geofencePendingIntent != null) { return geofencePendingIntent; } Intent intent = new Intent(this, GeofenceBroadcastReceiver.class); // We use FLAG_UPDATE_CURRENT so that we get the same pending intent back when // calling addGeofences() and removeGeofences(). geofencePendingIntent = PendingIntent.getBroadcast(this, 0, intent, PendingIntent. FLAG_UPDATE_CURRENT); return geofencePendingIntent; } </pre>		

Handle geofence transitions

When Location Services detects that the user has entered or exited a geofence, it sends out the Intent contained in the PendingIntent you included in the request to add geofences. A broadcast receiver like GeofenceBroadcastReceiver notices that the Intent was invoked and can then obtain the geofencing event from the intent, determine the type of Geofence transition(s), and determine which of the defined geofences was triggered.

The broadcast receiver can direct an app to start performing background work or, if desired, send a notification as output.

The following snippet shows how to define a **BroadcastReceiver** that posts a notification when a geofence transition occurs. When the user clicks the notification, the app's main activity appears:

```
Kotlin
             Java
                                                                                                   00
  class GeofenceBroadcastReceiver : BroadcastReceiver() {
      override fun onReceive(context: Context?, intent: Intent?) {
           val geofencingEvent = GeofencingEvent.fromIntent(intent)
           if (geofencingEvent.hasError()) {
               val errorMessage = GeofenceStatusCodes
                       .getStatusCodeString(geofencingEvent.errorCode)
               Log.e(TAG, errorMessage)
               return
           }
           // Get the transition type.
           val geofenceTransition = geofencingEvent.geofenceTransition
           // Test that the reported transition was of interest.
           if (geofenceTransition == Geofence.GEOFENCE_TRANSITION_ENTER
                   geofenceTransition == Geofence.GEOFENCE_TRANSITION_EXIT) {
               // Get the geofences that were triggered. A single event can trigger
               // multiple geofences.
               val triggeringGeofences = geofencingEvent.triggeringGeofences
               // Get the transition details as a String.
               val geofenceTransitionDetails = getGeofenceTransitionDetails(
                       this.
                       geofenceTransition.
                       triggeringGeofences
               )
               // Send notification and log the transition details.
               sendNotification(geofenceTransitionDetails)
               Log.i(TAG, geofenceTransitionDetails)
           } else {
               // Log the error.
               Log.e(TAG, getString(R.string.geofence_transition_invalid_type,
                      geofenceTransition))
           }
      }
  }
After detecting the transition event via the PendingIntent, the BroadcastReceiver gets the geofence transition type
and tests whether it is one of the events the app uses to trigger notifications -- either GEOFENCE_TRANSITION_ENTER or
GEOFENCE_TRANSITION_EXIT in this case. The service then sends a notification and logs the transition details.
```

https://developer.android.com/training/location/geofencing

50. LG provides a mobile device, wherein the at least one module comprises instructions for: providing, to the second one of the one or more registered application programs on the mobile device, at least the second particular associated identifier from its selecting in response to receiving, from the second one of the one or more registered application programs on the mobile device, a request to receive content, including as demonstrated in the exemplary text and images below:

Define a broadcast receiver for geofence transitions

An **Intent** sent from Location Services can trigger various actions in your app, but you should *not* have it start an activity or fragment, because components should only become visible in response to a user action. In many cases, a **BroadcastReceiver** is a good way to handle a geofence transition. A **BroadcastReceiver** gets updates when an event occurs, such as a transition into or out of a geofence, and can start long-running background work.

The following snippet shows how to define a **PendingIntent** that starts a **BroadcastReceiver** :

```
Kotlin
          Java
                                                                                              1
public class MainActivity extends AppCompatActivity {
   // ...
   private PendingIntent getGeofencePendingIntent() {
        // Reuse the PendingIntent if we already have it.
        if (geofencePendingIntent != null) {
           return geofencePendingIntent;
        Intent intent = new Intent(this, GeofenceBroadcastReceiver.class);
        // We use FLAG_UPDATE_CURRENT so that we get the same pending intent back when
        // calling addGeofences() and removeGeofences().
        geofencePendingIntent = PendingIntent.getBroadcast(this, 0, intent, PendingIntent.
               FLAG_UPDATE_CURRENT);
        return geofencePendingIntent;
   }
```

Handle geofence transitions

When Location Services detects that the user has entered or exited a geofence, it sends out the Intent contained in the PendingIntent you included in the request to add geofences. A broadcast receiver like GeofenceBroadcastReceiver notices that the Intent was invoked and can then obtain the geofencing event from the intent, determine the type of Geofence transition(s), and determine which of the defined geofences was triggered. The broadcast receiver can direct an app to start performing background work or, if desired, send a notification as output.

The following snippet shows how to define a **BroadcastReceiver** that posts a notification when a geofence transition occurs. When the user clicks the notification, the app's main activity appears:

```
Kotlin
             Java
                                                                                                    1
  class GeofenceBroadcastReceiver : BroadcastReceiver() {
       override fun onReceive(context: Context?, intent: Intent?) {
           val geofencingEvent = GeofencingEvent.fromIntent(intent)
           if (geofencingEvent.hasError()) {
               val errorMessage = GeofenceStatusCodes
                       .getStatusCodeString(geofencingEvent.errorCode)
               Log.e(TAG, errorMessage)
               return
           }
           // Get the transition type
           val geofenceTransition = geofencingEvent.geofenceTransition
           // Test that the reported transition was of interest.
           if (geofenceTransition == Geofence.GEOFENCE_TRANSITION_ENTER
                   geofenceTransition == Geofence.GEOFENCE_TRANSITION_EXIT) {
               // Get the geofences that were triggered. A single event can trigger
               // multiple geofences.
               val triggeringGeofences = geofencingEvent.triggeringGeofences
               // Get the transition details as a String.
               val geofenceTransitionDetails = getGeofenceTransitionDetails(
                       this.
                       geofenceTransition,
                       triggeringGeofences
               )
               // Send notification and log the transition details.
               sendNotification(geofenceTransitionDetails)
               Log.i(TAG, geofenceTransitionDetails)
           } else {
               // Log the error.
               Log.e(TAG, getString(R.string.geofence_transition_invalid_type,
                       geofenceTransition))
           }
      }
  }
After detecting the transition event via the PendingIntent , the BroadcastReceiver gets the geofence transition type
and tests whether it is one of the events the app uses to trigger notifications -- either GEOFENCE_TRANSITION_ENTER or
GEOFENCE_TRANSITION_EXIT in this case. The service then sends a notification and logs the transition details.
```

https://developer.android.com/training/location/geofencing

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51. By engaging in the conduct described herein, LG has injured Plaintiffs and is thus liable for infringement of the '418 Patent, pursuant to 35 U.S.C. § 271. LG has committed these acts of infringement without license or authorization.

52. As a result of LG's infringement of the '418 Patent, Plaintiffs have suffered monetary damages and are entitled to a monetary judgment in an amount adequate to compensate for LG's past infringement, together with interests and costs. In addition, LG's infringement is causing irreparable harm and monetary damage to Plaintiffs and will continue to do so unless and until LG is enjoined by the Court.

COUNT II: CLAIM FOR PATENT INFRINGEMENT OF THE '387 PATENT

53. Plaintiffs repeat and reallege the allegations in paragraphs 1-52 as if fully set forth herein.

54. LG has infringed, contributed to the infringement of, and/or induced infringement of the '387 Patent by making, using, selling, offering for sale, or importing into the United States, or by intending that others make, use, import into, offer for sale, or sell in the United States, products and/or methods covered by one or more claims of the '387 Patent including, but not limited to, mobile devices and components thereof.

55. Upon information and belief, LG's mobile devices, including smartphones and tablets, that infringe one or more claims of the '387 Patent include at least the following products, as well as products with reasonably similar functionality:

 LG G series, LG K series, LG Q series, LG V series, LG W series, LG X series, LG Aristo series, LG Nexus series, LG Stylo series, LG Velvet series, LG Escape series, LG Arena series, LG Prime series, LG Tribute series, LG Fortune series, LG Grace series, LG Harmony series, LG Journey series, LG Neon series, LG Phoenix series, LG Premier series, LG Rebel series, LG Risio series, LG Solo series, LG Transpyre series, LG Zone series, and LG Wing series cell phones; and

• LG G Pad series tablets.

Upon information and belief, these products are offered in several varieties, including different options for size, display, processor, storage, and battery. The products listed are exemplary, and Plaintiffs will be able to provide a more comprehensive list after discovery. Upon information and belief, LG also infringes one or more claims of the '387 Patent through its use of geofencing or location information in its advertising or content delivery efforts or its own applications it develops.

56. For example, upon information and belief, LG's mobile devices infringe at least claim 1 of the '387 Patent. LG makes, uses, sells, offers for sale, imports, exports, supplies, or distributes within the United States its mobile devices and thus directly infringes the '387 Patent.

57. LG indirectly infringes the '387 Patent as provided by 35 U.S.C. § 271(b) by inducing infringement by others, such as manufacturers, resellers, and end-user customers in this District and throughout the United States. For example, direct infringement is the result of activities performed by manufacturers, resellers, or operators/carriers of LG's mobile devices, who, upon information and belief, perform each step of the claimed invention as directed by LG. LG received actual notice of the '387 Patent at least as early as the filing of this Complaint.

58. Upon information and belief, LG's affirmative acts of selling LG's mobile devices, causing LG's mobile devices to be manufactured, and providing directions, instructions,

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schematics, diagrams, or designs to its manufacturers, resellers, or operators/carriers to make or use LG's mobile devices in a manner that directly infringes the '387 Patent induce infringement by others, such as manufacturers, resellers, or operators/carriers in this District and throughout the United States. Upon information and belief, through its manufacture and sales of LG's mobile devices, LG performed the acts that constitute induced infringement with knowledge or willful blindness that the induced acts would constitute infringement.

59. LG also indirectly infringes the '387 Patent by contributing to infringement by others, such as manufacturers, resellers, and operators/carriers, in accordance with 35 U.S.C. § 271(c) in this District and throughout the United States. Upon information and belief, direct infringement is the result of activities performed by manufacturers, resellers, or operators/carriers of LG's mobile devices.

60. Upon information and belief, LG's affirmative acts of selling LG's mobile devices and causing LG's mobile devices to be manufactured and sold contribute to LG's manufacturers, resellers, and operators/carriers making or using LG's mobile devices in a normal and customary way that infringes the '387 Patent. Upon information and belief, LG's mobile devices constitute the material part of Plaintiffs' patented invention, have no substantial non-infringing uses, and are known by LG to be especially made or especially adapted for use to infringe the '387 Patent.

61. LG provides a mobile device comprising: memory, at least one processor operably coupled to the memory, a location-determination component, and at least one module configured for execution by the at least one processor, including as demonstrated in the exemplary text and images below:





https://www.lg.com/us





https://www.lg.com/us/cell-phones/lg-lmv600tmlatmocb-tmobile-v60-thinq-5g https://www.lg.com/us/support/products/documents/Specs_LG_V60_ThinQ_TMUS_0310%20(1).pdf

62. LG provides a mobile device, wherein the at least one module comprises at least one instruction for: receiving, from an application program during its execution in the mobile device, one or more requests to reserve at least one selected geographic area of interest, wherein the at least one selected geographic area of interest in each of the one or more requests is being requested via said application program to be reserved for having a particular identifier associated with the at least one selected geographic area of interest provided to said application program after it has been determined, by at least use of the at least one processor and of location information representing at least one physical geographic location of the mobile device as determined by the location-determination component, that the mobile device has at least entered the at least one selected geographic area of interest, and wherein each of the one or more requests comprises data representing a) said particular identifier, represented by a data string, as content provided via said application program to be associated with the at least one selected geographic area of interest, b) at least one latitude value, at least one longitude value, and at least one radius value, each being provided via said application program, to be used for establishing a perimeter boundary for the at least one selected geographic area of interest, and c) information specifying at least one area bound by the perimeter boundary as the at least one selected geographic area of interest, including as demonstrated in the exemplary text and images below:

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.



This lesson shows you how to add and remove geofences, and then listen for geofence transitions using a **BroadcastReceiver**.







```
Define a broadcast receiver for geofence transitions
An Intent sent from Location Services can trigger various actions in your app, but you should not have it start an
activity or fragment, because components should only become visible in response to a user action. In many cases, a
BroadcastReceiver is a good way to handle a geofence transition. A BroadcastReceiver gets updates when an
event occurs, such as a transition into or out of a geofence, and can start long-running background work.
The following snippet shows how to define a PendingIntent that starts a BroadcastReceiver :
   Kotlin
             Java
                                                                                                     0
   public class MainActivity extends AppCompatActivity {
       // ...
       private PendingIntent getGeofencePendingIntent() {
           // Reuse the PendingIntent if we already have it.
           if (geofencePendingIntent != null) {
               return geofencePendingIntent;
           }
           Intent intent = new Intent(this, GeofenceBroadcastReceiver.class);
           // We use FLAG_UPDATE_CURRENT so that we get the same pending intent back when
           // calling addGeofences() and removeGeofences().
           geofencePendingIntent = PendingIntent.getBroadcast(this, 0, intent, PendingIntent.
                   FLAG_UPDATE_CURRENT);
           return geofencePendingIntent;
       }
```

```
Add geofences
To add geofences, use the GeofencingClient.addGeofences() method. Provide the GeofencingRequest object, and
the PendingIntent. The following snippet demonstrates processing the results:
   Kotlin
              Java
                                                                                                   0 D
   geofencingClient.addGeofences(getGeofencingRequest(), getGeofencePendingIntent())
           .addOnSuccessListener(this, new OnSuccessListener<Void>() {
               @Override
               public void onSuccess(Void aVoid) {
                   // Geofences added
                   // ...
           })
           .addOnFailureListener(this, new OnFailureListener() {
               @Override
               public void onFailure(@NonNull Exception e) {
                   // Failed to add geofences
                   // ...
               }
           });
```

https://developer.android.com/training/location/geofencing

63. LG provides a mobile device, wherein the at least one module comprises at least one instruction for: registering said application program, in the memory, for having said particular identifier provided to said application program after it has been determined, by at least use of the at least one processor and of the location information, that the mobile device has at least entered the at least one selected geographic area of interest, including as demonstrated in the exemplary text and images below:

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.








https://developer.android.com/training/location/geofencing

64. LG provides a mobile device, wherein the at least one module comprises at least one instruction for: storing, in the memory, at least one record, for said application program, associated with said particular identifier and the at least one selected geographic area of interest, including as demonstrated in the exemplary text and images below:

	- Character LICP Time C ¹⁰ part uninders character ² Outlearner Outlet Charact ¹⁰ 4.0 -
Placform: Android 10	 Charging: Osb type-C port, wretess charging ; Qualcontin Quick charge 4.0+ Internal Memory: 129 CP (up to 09.9 CP urship))
frocessor. Qualcommismapuragon = 605 Octa-cure	 Internal memory. 126 Gb (up to 356 Gb usable).
(up to 3 x 2.4 GHz + 1 x 2.8 GHz + 4 x 1.8 GHz)	 microSD[¬]: supports card up to 2 TB (cards sold separately)
Battery Capacity: 5000 mAh (Non-Removable)	 RAM: 8 GB
Talk Time: up to 21 hours ¹	 Hearing Aids: Rated for M4, T4
Standby Time: up to 590 hours1	

https://www.lg.com/us/cell-phones/lg-lmv600tmlatmocb-tmobile-v60-thinq-5g https://www.lg.com/us/support/products/documents/Specs_LG_V60_ThinQ_TMUS_0310%20(1).pdf



https://developer.android.com/training/location/geofencing

GeofencingClient public class GeofencingClient extends GoogleApi <api.apioptions.nooptions></api.apioptions.nooptions>					
The main ent	The main entry point for interacting with the geofencing APIs.				
Get an instance of this client via LocationServices.getGeofencingClient(Activity).					
All methods are thread safe.					
Public Method Summary					
Task <void></void>	addGeofences(GeofencingRequest geofencingRequest, PendingIntent pendingIntent) Sets alerts to be notified when the device enters or exits one of the specified geofences.				
Task <void></void>	removeGeofences(List <string> geofenceRequestIds) Removes geofences by their request IDs.</string>				
Task <void></void>	removeGeofences(PendingIntent pendingIntent) Removes all geofences associated with the given pendingIntent.				

public Task <void> addGeofences (GeofencingRequest geofencingRequest, PendingIntent pendingIntent)</void>						
Sets alerts to be notified when the device enters or exits one of the specified geofences. If an existing geofence with the same request ID is already registered, the old geofence is replaced by the new one, and the new PendingIntent is used to generate intents for alerts.						
Task is completed when geofences are successfully added or failed to be added. Upon failure, an ApiException will be set on the Task. Refer to GeofenceStatusCodes for possible errors when adding geofences.						
When a geofence transition (for example, entering or exiting) matches one of the transition filter (see Geofence.Builder.setTransitionTypes(int)) in the given geofence list, an intent is generated using the given pending intent. You can call GeofencingEvent.fromIntent(android.content.Intent) to get the transition type, geofences that triggered this intent and the location that triggered the geofence transition.						
In case network location provider is disabled by the user, the geofence service will stop updating, all registered geofences will be removed and an intent is generated by the provided pending intent. In this case, the GeofencingEvent created from this intent represents an error event, where GeofencingEvent.hasError() returns true and GeofencingEvent.getErrorCode() returns GeofenceStatusCodes.GEOFENCE_NOT_AVAILABLE .						
This method require	<pre>Manifest.permission.ACCESS_FINE_LOCATION.</pre>					
Parameters						
geofencingRequest	geofencing request that include a list of geofences to be added and related triggering behavior. The request must be created using GeofencingRequest.Builder .					
pendingIntent	a pending intent that will be used to generate an intent when matched geofence transition is observed					
Throws						
SecurityException	if the app does not have Manifest.permission.ACCESS_FINE_LOCATION permission					
NullPointerException	if geofencingRequest or pendingIntent is null					

https://developers.google.com/android/reference/com/google/android/gms/location/GeofencingC lient.html

Handle geofence transitions

When Location Services detects that the user has entered or exited a geofence, it sends out the Intent contained in the PendingIntent you included in the request to add geofences. A broadcast receiver like GeofenceBroadcastReceiver notices that the Intent was invoked and can then obtain the geofencing event from the intent, determine the type of Geofence transition(s), and determine which of the defined geofences was triggered. The broadcast receiver can direct an app to start performing background work or, if desired, send a notification as output.



https://developer.android.com/training/location/geofencing

65. LG provides a mobile device, wherein the at least one module comprises at least one instruction for: obtaining the location information representing at least one physical geographic location of the mobile device as determined by the location-determination component, including as demonstrated in the exemplary text and images below:



```
To access the location APIs, you need to create an instance of the Geofencing client. To learn how to connect your client:

Kotlin Java

lateinit var geofencingClient: GeofencingClient

override fun onCreate(savedInstanceState: Bundle?) {

// ...

geofencingClient = LocationServices.getGeofencingClient(this)

}
```

https://developer.android.com/training/location/geofencing

66. LG provides a mobile device, wherein the at least one module comprises at least one instruction for: after it has been determined, by at least use of the at least one processor, of the location information, and of the at least one selected geographic area of interest associated with the at least one record stored in the memory for said application program, that the mobile device has at least entered the at least one selected geographic area of interest associated with the at least one record stored in the memory and has remained therein for at least a designated length of time, providing at least said particular identifier associated with the at least one record stored in the memory to said application program, including as demonstrated in the exemplary text and images below:

Create and monitor geofences

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.





Handle geofence transitions

When Location Services detects that the user has entered or exited a geofence, it sends out the Intent contained in the PendingIntent you included in the request to add geofences. A broadcast receiver like GeofenceBroadcastReceiver notices that the Intent was invoked and can then obtain the geofencing event from the intent, determine the type of Geofence transition(s), and determine which of the defined geofences was triggered. The broadcast receiver can direct an app to start performing background work or, if desired, send a notification as output.

The following snippet shows how to define a **BroadcastReceiver** that posts a notification when a geofence transition occurs. When the user clicks the notification, the app's main activity appears:

```
Kotlin
             Java
                                                                                                    10
   class GeofenceBroadcastReceiver : BroadcastReceiver() {
       // ...
      override fun onReceive(context: Context?, intent: Intent?) {
           val geofencingEvent = GeofencingEvent.fromIntent(intent)
           if (geofencingEvent.hasError()) {
               val errorMessage = GeofenceStatusCodes
                       .getStatusCodeString(geofencingEvent.errorCode)
               Log.e(TAG, errorMessage)
               return
           }
           // Get the transition type.
           val geofenceTransition = geofencingEvent.geofenceTransition
           // Test that the reported transition was of interest.
           if (geofenceTransition == Geofence.GEOFENCE_TRANSITION_ENTER |
                   geofenceTransition == Geofence.GEOFENCE_TRANSITION_EXIT) {
               // Get the geofences that were triggered. A single event can trigger
               // multiple geofences.
               val triggeringGeofences = geofencingEvent.triggeringGeofences
               // Get the transition details as a String.
               val geofenceTransitionDetails = getGeofenceTransitionDetails(
                       this.
                       geofenceTransition,
                       triggeringGeofences
               )
               // Send notification and log the transition details.
               sendNotification(geofenceTransitionDetails)
               Log.i(TAG, geofenceTransitionDetails)
           } else {
               // Log the error.
               Log.e(TAG, getString(R.string.geofence_transition_invalid_type,
                       geofenceTransition))
           }
       }
   }
After detecting the transition event via the PendingIntent, the BroadcastReceiver gets the geofence transition type
and tests whether it is one of the events the app uses to trigger notifications -- either GEOFENCE_TRANSITION_ENTER or
GEOFENCE_TRANSITION_EXIT in this case. The service then sends a notification and logs the transition details.
```

Use the dwell transition type to reduce alert spam

If you receive a large number of alerts when driving briefly past a geofence, the best way to reduce the alerts is to use a transition type of **GEOFENCE_TRANSITION_DWELL** instead of **GEOFENCE_TRANSITION_ENTER**. This way, the dwelling alert is sent only when the user stops inside a geofence for a given period of time. You can choose the duration by setting a loitering delay.

https://developer.android.com/training/location/geofencing

67. By engaging in the conduct described herein, LG has injured Plaintiffs and is thus liable for infringement of the '387 Patent, pursuant to 35 U.S.C. § 271. LG has committed these acts of infringement without license or authorization.

68. As a result of LG's infringement of the '387 Patent, Plaintiffs have suffered monetary damages and are entitled to a monetary judgment in an amount adequate to compensate for LG's past infringement, together with interests and costs. In addition, LG's infringement is causing irreparable harm and monetary damage to Plaintiffs and will continue to do so unless and until LG is enjoined by the Court.

COUNT III: CLAIM FOR PATENT INFRINGEMENT OF THE '447 PATENT

69. Plaintiffs repeat and reallege the allegations in paragraphs 1-68 as if fully set forth herein.

70. LG has infringed, contributed to the infringement of, and/or induced infringement of the '447 Patent by making, using, selling, offering for sale, or importing into the United States, or by intending that others make, use, import into, offer for sale, or sell in the United States, products and/or methods covered by one or more claims of the '447 Patent including, but not limited to, mobile devices and components thereof. 71. Upon information and belief, LG's mobile devices, including smartphones and tablets, that infringe one or more claims of the '447 Patent include at least the following products, as well as products with reasonably similar functionality:

- LG G series, LG K series, LG Q series, LG V series, LG W series, LG X series, LG Aristo series, LG Nexus series, LG Stylo series, LG Velvet series, LG Escape series, LG Arena series, LG Prime series, LG Tribute series, LG Fortune series, LG Grace series, LG Harmony series, LG Journey series, LG Neon series, LG Phoenix series, LG Premier series, LG Rebel series, LG Risio series, LG Solo series, LG Transpyre series, LG Zone series, and LG Wing series cell phones; and
- LG G Pad series tablets.

Upon information and belief, these products are offered in several varieties, including different options for size, display, processor, storage, and battery. The products listed are exemplary, and Plaintiffs will be able to provide a more comprehensive list after discovery. Upon information and belief, LG also infringes one or more claims of the '447 Patent through its use of geofencing or location information in its advertising or content delivery efforts or its own applications it develops.

72. For example, upon information and belief, LG's mobile devices infringe at least claim 1 of the '447 Patent. LG makes, uses, sells, offers for sale, imports, exports, supplies, or distributes within the United States its mobile devices and thus directly infringes the '447 Patent.

73. LG indirectly infringes the '447 Patent as provided by 35 U.S.C. § 271(b) by inducing infringement by others, such as manufacturers, resellers, and end-user customers in this

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District and throughout the United States. For example, direct infringement is the result of activities performed by manufacturers, resellers, or operators/carriers of LG's mobile devices, who, upon information and belief, perform each step of the claimed invention as directed by LG. LG received actual notice of the '447 Patent at least as early as the filing of this Complaint.

74. Upon information and belief, LG's affirmative acts of selling LG's mobile devices, causing LG's mobile devices to be manufactured, and providing directions, instructions, schematics, diagrams, or designs to its manufacturers, resellers, or operators/carriers to make or use LG's mobile devices in a manner that directly infringes the '447 Patent induce infringement by others, such as manufacturers, resellers, or operators/carriers in this District and throughout the United States. Upon information and belief, through its manufacture and sales of LG's mobile devices, LG performed the acts that constitute induced infringement with knowledge or willful blindness that the induced acts would constitute infringement.

75. LG also indirectly infringes the '447 Patent by contributing to infringement by others, such as manufacturers, resellers, and operators/carriers, in accordance with 35 U.S.C. § 271(c) in this District and throughout the United States. Upon information and belief, direct infringement is the result of activities performed by manufacturers, resellers, or operators/carriers of LG's mobile devices.

76. Upon information and belief, LG's affirmative acts of selling LG's mobile devices and causing LG's mobile devices to be manufactured and sold contribute to LG's manufacturers, resellers, and operators/carriers making or using LG's mobile devices in a normal and customary way that infringes the '447 Patent. Upon information and belief, LG's mobile devices constitute the material part of Plaintiffs' patented invention, have no substantial non-infringing uses, and are known by LG to be especially made or especially adapted for use to infringe the '447 Patent.

77. LG provides a mobile device comprising: memory, at least one processor operably coupled to the memory, a location-determination component, and at least one module configured for execution by the at least one processor, including as demonstrated in the exemplary text and images below:



	DUAL SCREEN PHONES >	5G PHONES >	V SERIES PHONES >	G SERIES PHONES >	
<			900 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		>
	Multi-task with virtually endless ways to use two screens at once.	5G connectivity at ultra-fast speeds for a next-gen mobile experience.	Vivid and immersive multi-media experience at your fingertips.	All around, premium mobile for any lifestyle.	
<					<
	LG G Pad 5™ 10.1 FHD	LG G Pad 5™ 10.1 FHD Metro by T- Mobile	LG G Pad® F2 8.0 Sprint	LG G Pad 5™ 10.1 FHD T-Mobile	
	LMT600QSACCASV	LMT600MSAMTPSV	LK460	LMT600TSS.ATMOSV	
	★★★ ★ ★ 2.5 (14)	★★★ ★ 3.7 (3)	★★★★ 4.0 (24)	★★★★ 3.0 (14)	

https://www.lg.com/us



https://www.lg.com/us/cell-phones/lg-lmv600tmlatmocb-tmobile-v60-thinq-5g https://www.lg.com/us/support/products/documents/Specs_LG_V60_ThinQ_TMUS_0310%20(1).pdf

78. LG provides a mobile device, wherein the at least one module comprises at least one instruction for: in response to receiving, from an application program during its execution in the mobile device, a request for having at least a first identifier being associated with a first designated geographic area of interest provided to the application program after it has been determined, by at least use of the at least one processor and of location information representing at least one physical geographic location of the mobile device as determined by the locationdetermination component, that the mobile device has at least entered the first designated geographic area of interest and has remained therein for at least a predetermined length of time, after receiving, from the application program, both a first data string comprising the first identifier to be associated with the first designated geographic area of interest and first geographic data to be used for defining the first designated geographic area of interest and to be used with the first identifier to establish, in the memory, the first designated geographic area of interest as a first area specifically reserved for delivery of the first identifier related to the application program, after establishing, in the memory, the first designated geographic area of interest as the first area specifically reserved for delivery of the first identifier related to the application program, after storing, in the memory, a first record comprising the first identifier, and after determining, by at least use of the at least one processor and of the location information, that the mobile device has at least entered the first area specifically reserved for delivery of the first identifier related to the application program and has remained therein for at least the predetermined length of time, delivering, from the first record stored in the memory and to the application program, at least first datum comprising at least the first identifier, including as demonstrated in the exemplary text and

images below:

Create and monitor geofences $\hfill \square$

Geofencing combines awareness of the user's current location with awareness of the user's proximity to locations that may be of interest. To mark a location of interest, you specify its latitude and longitude. To adjust the proximity for the location, you add a radius. The latitude, longitude, and radius define a geofence, creating a circular area, or fence, around the location of interest.

You can have multiple active geofences, with a limit of 100 per app, per device user. For each geofence, you can ask Location Services to send you entrance and exit events, or you can specify a duration within the geofence area to wait, or *dwell*, before triggering an event. You can limit the duration of any geofence by specifying an expiration duration in milliseconds. After the geofence expires, Location Services automatically removes it.



This lesson shows you how to add and remove geofences, and then listen for geofence transitions using a **BroadcastReceiver**.







```
Define a broadcast receiver for geofence transitions
An Intent sent from Location Services can trigger various actions in your app, but you should not have it start an
activity or fragment, because components should only become visible in response to a user action. In many cases, a
BroadcastReceiver is a good way to handle a geofence transition. A BroadcastReceiver gets updates when an
event occurs, such as a transition into or out of a geofence, and can start long-running background work.
The following snippet shows how to define a PendingIntent that starts a BroadcastReceiver :
   Kotlin
             Java
                                                                                                     0
   public class MainActivity extends AppCompatActivity {
       // ...
       private PendingIntent getGeofencePendingIntent() {
           // Reuse the PendingIntent if we already have it.
           if (geofencePendingIntent != null) {
               return geofencePendingIntent;
           }
           Intent intent = new Intent(this, GeofenceBroadcastReceiver.class);
           // We use FLAG_UPDATE_CURRENT so that we get the same pending intent back when
           // calling addGeofences() and removeGeofences().
           geofencePendingIntent = PendingIntent.getBroadcast(this, 0, intent, PendingIntent.
                   FLAG_UPDATE_CURRENT);
           return geofencePendingIntent;
       }
```

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Handle geofence transitions

When Location Services detects that the user has entered or exited a geofence, it sends out the Intent contained in the PendingIntent you included in the request to add geofences. A broadcast receiver like GeofenceBroadcastReceiver notices that the Intent was invoked and can then obtain the geofencing event from the intent, determine the type of Geofence transition(s), and determine which of the defined geofences was triggered. The broadcast receiver can direct an app to start performing background work or, if desired, send a notification as output.



Use the dwell transition type to reduce alert spam

If you receive a large number of alerts when driving briefly past a geofence, the best way to reduce the alerts is to use a transition type of **GEOFENCE_TRANSITION_DWELL** instead of **GEOFENCE_TRANSITION_ENTER**. This way, the dwelling alert is sent only when the user stops inside a geofence for a given period of time. You can choose the duration by setting a loitering delay.

https://developer.android.com/training/location/geofencing

79. By engaging in the conduct described herein, LG has injured Plaintiffs and is thus liable for infringement of the '447 Patent, pursuant to 35 U.S.C. § 271. LG has committed these acts of infringement without license or authorization.

80. As a result of LG's infringement of the '447 Patent, Plaintiffs have suffered monetary damages and are entitled to a monetary judgment in an amount adequate to compensate for LG's past infringement, together with interests and costs. In addition, LG's infringement is causing irreparable harm and monetary damage to Plaintiffs and will continue to do so unless and until LG is enjoined by the Court.

DEMAND FOR JURY TRIAL

81. Plaintiffs hereby demand a trial by jury on all claims so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and grant the following relief:

- A. Adjudge that LG infringes the Asserted Patents;
- B. Adjudge that the Asserted Patents are valid and enforceable;
- C. Award Plaintiffs damages in an amount adequate to compensate Plaintiffs for LG's infringement of the Asserted Patents, but in no event less than a reasonable royalty under 35 U.S.C. § 284;
- D. Award enhanced damages pursuant to 35 U.S.C. § 284;
- E. Award Plaintiffs pre-judgment and post-judgment interest to the full extent allowed under the law, as well as their costs;

- F. Enter an order finding that this is an exceptional case and awarding Plaintiffs their reasonable attorneys' fees pursuant to 35 U.S.C. § 285;
- G. Enter a permanent injunction against all LG products found to infringe the Asserted Patents;
- H. Award, in lieu of an injunction, a compulsory forward royalty;
- I. Order an accounting of damages; and
- J. Award such other relief, including equitable relief, as the Court may deem appropriate and just under the circumstances.

DATED: July 30, 2021

Respectfully submitted,

/s/ Thomas M. Melsheimer

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