

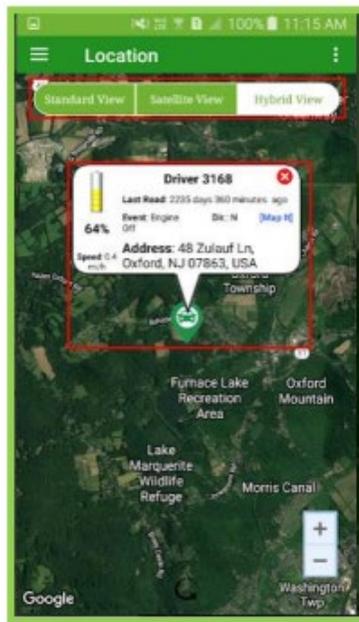




1 12. The '365 Patent is valid, enforceable, and was duly issued in full  
2 compliance with Title 35 of the United States Code.

3 13. Upon information and belief, Defendant has infringed and continues to  
4 infringe one or more claims, including at least Claim 1, of the '365 Patent by making,  
5 using (at least by having its employees, or someone under Defendant's control, test  
6 the accused Product), importing, selling, and/or offering for sale associated hardware  
7 and software for asset locating services (e.g., Matrack asset tracking platform, and  
8 any associated hardware, apps, or other software) ("Product") covered by at least  
9 Claim 1 of the '365 Patent. Defendant has infringed and continues to infringe the '365  
10 patent either directly or through acts of contributory infringement or inducement in  
11 violation of 35 U.S.C. § 271.

12 14. The Product provides an asset tracking system for real-time GPS  
13 tracking of assets. A user can receive location information on a positional information  
14 device (e.g., mobile device or computer). Certain aspects of this element are  
15 illustrated in the screenshot(s) below and/or in those provided in connection with  
16 other allegations herein.



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27 Source: [https://play.google.com/store/apps/details?id=com.matrackinc.matrackgps&hl=en\\_US](https://play.google.com/store/apps/details?id=com.matrackinc.matrackgps&hl=en_US)  
Source: <https://www.matrackinc.com/gps-vehicle-tracker/>

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Our fleet tracking software and systems give you the visibility you need to track and manage your fleet efficiently while streamlining your operations, reducing costs, and increasing revenue.

**MATRACK GPS FLEET TRACKING**

**What Matters Most**

- See Location In Real Time
- Access Drive & Operator Behavior
- Tracking Electronic Driver Logs
- Know when Asset Leave Designated Area
- Track Maintenance Needs

Source: <https://www.matrackinc.com/gps-vehicle-tracker/>

Source: <https://matrackinc.com/fleet-tracking/>



**REALTIME TRACKING**

**Stay connected with your vehicle/asset through Real time Tracking**

- Customized tracking subscriptions
- Unlimited tracking
- Various alerts like Tow Alert, Ignition On /Off, Low battery alert, Speed alert etc
- All new 4G connectivity
- Easy recovery in case of theft

Source: <https://www.matrackinc.com/gps-vehicle-tracker/>

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

1 Your login details will be mailed to you. Using the account  
2 login and password, log on to your account. Once the blue  
3 status LED is blinking once every three seconds, the device  
4 will shortly start transmitting information to the host server  
5 (it transmits once every minute when vehicle is running and  
6 every 2 hours when not running) and you can see all the  
7 logged information.

8 Source: <https://www.matrackinc.com/wp-content/uploads/2019/09/Quickstartguide-OBd-1.pdf>

### 9 GPS Tracking Data

10 GPS tracking data (reports sent in from GPS tracking devices) is stored on our main server and a backup server for 1  
11 year. Data older than 1 year cannot be restored. An active The Company account is required to access GPS data.  
12 Upon termination of service, GPS data will be erased from the main server and the backup server and cannot be  
restored.

13 Source: <https://matrackinc.com/terms-and-conditions/>



### 15 REALTIME TRACKING

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18 time Tracking

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- 23 • Easy recovery in case of theft

### 24 REAL-TIME 25 GPS 26 TRACKING



27 Live vehicle location tracking  
28 Trip Histories  
Geofence alert

Source: <https://www.matrackinc.com/gps-vehicle-tracker/>

Source: <https://matrackinc.com/fleet-tracking/>

16. The at least one address is received from the server at the requesting positional information device. For example the Product's server transmits the position of an asset (at least one address) to the requesting positional information device. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

1 Your login details will be mailed to you. Using the account  
2 login and password, log on to your account. Once the blue  
3 status LED is blinking once every three seconds, the device  
4 will shortly start transmitting information to the host server  
5 (it transmits once every minute when vehicle is running and  
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8 Source: <https://www.matrackinc.com/wp-content/uploads/2019/09/Quickstartguide-OBD-1.pdf>

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### 22 REAL-TIME 23 GPS 24 TRACKING



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26 Trip Histories  
27 Geofence alert

28 Source: <https://www.matrackinc.com/gps-vehicle-tracker/>

Source: <https://matrackinc.com/fleet-tracking/>

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

1 (from the server) the asset's GPS location (i.e., at least one stored address stored). As  
2 shown above, before activating the tracker (i.e., the sending positional information  
3 device), a unique tracking device's ID number or credentials (i.e., second identifier)  
4 needs to be added to the user's account identified by the user login ID and password  
5 (i.e., the first identifier). Hence, the tracker device's ID number or asset credentials  
6 (i.e., second identifier) is mapped to the user's login ID (i.e., the first identifier) for  
7 tracking the real-time location (i.e., at least one stored address stored) of the asset.  
8 Certain aspects of this element are illustrated in the screenshot(s) below and/or in  
9 those provided in connection with other allegations herein.



Source: <https://matrackinc.com/fleet-tracking/>

A screenshot of a device activation form. The form has a 'Device Type:' label above a dropdown menu. The dropdown menu is set to 'OBD'. Below the dropdown is a text input field labeled 'IMEI or MEID #1'. Both the dropdown and the text input field have a red asterisk next to them, indicating they are required fields.

Source: <https://matrackinc.com/reseller/client/activation/>

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Source: <https://www.matrackinc.com/gps-vehicle-tracker/>



**LOGIN**

Username

Password

Remember password

[Forgot Password?](#)

**MA-OBD Classic Plug-in**



Data Network: 4G LTE Cat M1

Source: [https://www.matrack.io/gpstracking/client\\_login.php?r=3552](https://www.matrack.io/gpstracking/client_login.php?r=3552)  
Source: <https://www.matrackinc.com/gps-vehicle-tracker/>

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

