

Agents, Inc., 7014 13th Avenue, Suite 202, Brooklyn, NY, 11228.

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

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

VENUE

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

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

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

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

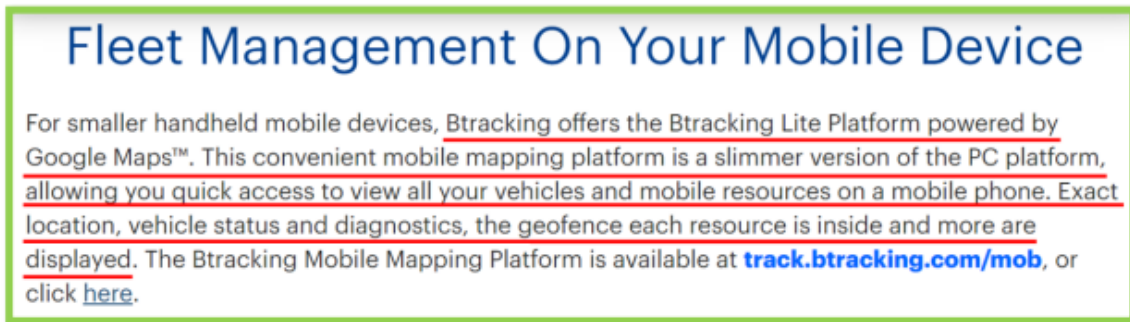
10. Plaintiff is the owner by assignment of the '365 Patent with sole rights to enforce the '365 Patent and sue infringers.

11. A copy of the '365 Patent, titled "Device, System and Method for Remotely Entering, Storing and Sharing Addresses for a Positional Information Device," is attached hereto as Exhibit A.

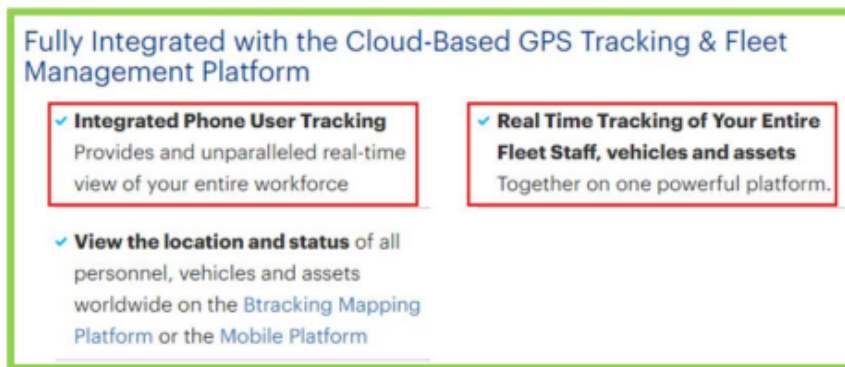
12. The '365 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

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

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



Source: <https://www.btracking.com/visibility/mobile-mapping-platform>



Source: <https://www.btracking.com/mobile-phone-tracking/cell-phones-tablets>



Source: <https://www.btracking.com/gps-trackers/gps-vehicle-trackers>

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 (e.g., employee mobile phone). Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

Exactly How Does GPS Tracking Work?

Tracking devices and smartphones have a GPS receiver. It obtains signals from a number of stationary satellites positioned in earth's orbit, and the combination of these signals will allow the device to determine its location in terms of latitude and longitude coordinates. The device sends these coordinates, along with the unique device identifier, to the Btracking server through a wireless network, and this information is used to plot the device's location on the Btracking Mapping Platform.

Source: <https://www.btracking.com/faq>

Btracking provides the tools to manage the mobile workforce. Track every vehicle in real time. Get notified when it enters or leaves any area with **Easy Geofences™** and **Real Time Alerts**. Use **Hot Spots** to see exactly where vehicles frequently stop and spend time. Get **Vehicle Diagnostics** with our OBDII trackers. Improve safety with **Driver Scorecard** and **SpeedGauge**. Plan, dispatch and track jobs with **Workflow**. Save fuel with idle alerts. Get instant crash notification .

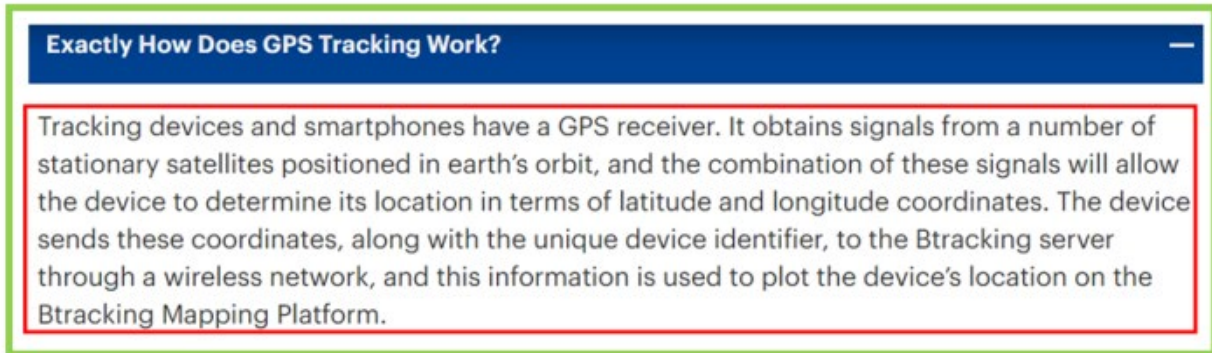
Source: <https://www.btracking.com/gps-tracking/vehicles-service-fleets>



Source: <https://track.btracking.com/Login.aspx>

16. The at least one address is received from the server at the requesting positional information device. For example, the Product's server transmits the position of an asset (at least

one address) to the requesting positional information device. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.



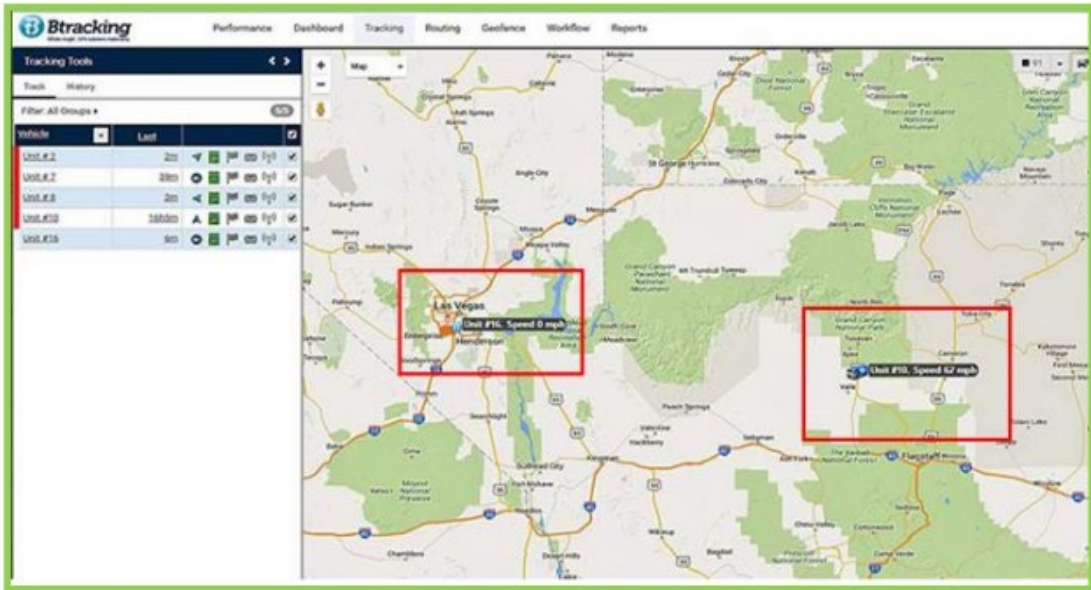
Source: <https://www.btracking.com/faq>

The screenshot shows a green-bordered box containing the following text: "Btracking provides the tools to manage the mobile workforce. Track every vehicle in real time. Get notified when it enters or leaves any area with Easy Geofences™ and Real Time Alerts. Use Hot Spots to see exactly where vehicles frequently stop and spend time. Get Vehicle Diagnostics with our OBDII trackers. Improve safety with Driver Scorecard and SpeedGauge. Plan, dispatch and track jobs with Workflow. Save fuel with idle alerts. Get instant crash notification ."

Source: <https://www.btracking.com/gps-tracking/vehicles-service-fleets>

17. A second identifier for the second (sending) positional information device is determined based on the first identifier and the server retrieves the at least one address stored in the at least one sending positional information device. The Product application installed on the requesting positional information device requests (from the server) the asset's GPS location (i.e., at least one stored address stored). As shown above, before activating the tracker (i.e., the sending positional information device), a unique tracking device's ID number or credentials (i.e., second identifier) needs to be added to the user's account identified by the user login ID and password (i.e., the first identifier). Hence, the tracker device's ID number or asset credentials (i.e., second identifier) is mapped to the user's login ID (i.e., the first identifier) for tracking the real-time location (i.e., at least one stored address stored) of the asset. Certain aspects of this

element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.



Source: <https://www.btracking.com/gps-tracking/vehicles-service-fleets#images-1>

Btracking provides the tools to manage the mobile workforce. Track every vehicle in real time. Get notified when it enters or leaves any area with Easy Geofences™ and Real Time Alerts. Use Hot Spots to see exactly where vehicles frequently stop and spend time. Get Vehicle Diagnostics with our OBDII trackers. Improve safety with Driver Scorecard and SpeedGauge. Plan, dispatch and track jobs with Workflow. Save fuel with idle alerts. Get instant crash notification .

Source: <https://www.btracking.com/gps-tracking/vehicles-service-fleets>

Fleet Management On Your Mobile Device

For smaller handheld mobile devices, Btracking offers the Btracking Lite Platform powered by Google Maps™. This convenient mobile mapping platform is a slimmer version of the PC platform, allowing you quick access to view all your vehicles and mobile resources on a mobile phone. Exact location, vehicle status and diagnostics, the geofence each resource is inside and more are displayed. The Btracking Mobile Mapping Platform is available at track.btracking.com/mob, or click [here](#).

Source: <https://www.btracking.com/visibility/mobile-mapping-platform>

Fully Integrated with the Cloud-Based GPS Tracking & Fleet Management Platform

✓ **Integrated Phone User Tracking**

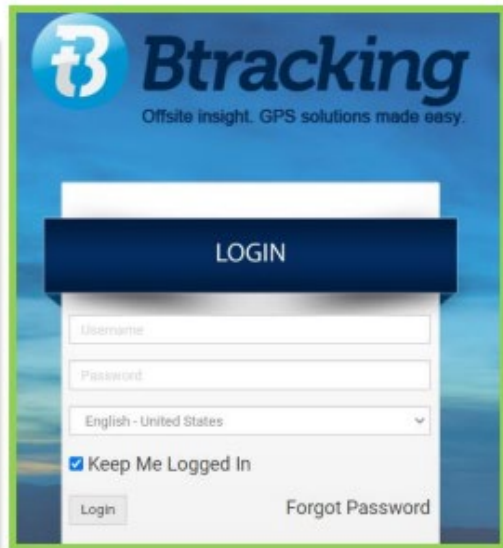
Provides an unparalleled real-time view of your entire workforce

✓ **Real Time Tracking of Your Entire Fleet Staff, vehicles and assets**

Together on one powerful platform.

✓ **View the location and status** of all personnel, vehicles and assets worldwide on the Btracking Mapping Platform or the Mobile Platform

Source: <https://www.btracking.com/mobile-phone-tracking/cell-phones-tablets>



Source: <https://track.btracking.com/Login.aspx>

Source: <https://www.btracking.com/gps-trackers/gps-vehicle-trackers>

18. Defendant's actions complained of herein will continue unless Defendant is

enjoined by this court.

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

20. Plaintiff is in compliance with 35 U.S.C. § 287.

JURY DEMAND

21. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 9,261,365 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: November 9, 2021.

Respectfully submitted,

/s/ Jay Johnson

JAY JOHNSON (*pro hac vice forthcoming*)

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