

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

NORTHSTAR SYSTEMS LLC,)	Case No.
)	
Plaintiff,)	<u>JURY TRIAL DEMANDED</u>
)	
v.)	
)	
HONDA MOTOR CO. LTD.,)	
)	
Defendant.)	
)	
)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff NorthStar Systems LLC (“NorthStar” or “Plaintiff”) for its Complaint against Defendant Honda Motor Co. Ltd. (“Honda” or “Defendant”) alleges as follows:

THE PARTIES

1. NorthStar is a limited liability company organized and existing under the laws of the State of Texas, with its principal place of business located at 104 E. Houston Street, Marshall, Texas 75670.

2. On information and belief, Honda is a Japanese corporation with its principal place of business located at 2-1-1, Minami-Aoyama Minato-Ku, 107-8556, Japan. On information and belief, Honda does business in Texas and in the Eastern District of Texas, directly or through intermediaries.

JURISDICTION

3. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant. Defendant regularly conducts business and has committed acts of patent infringement and/or has induced acts of patent infringement by others in this Judicial District and/or has contributed to patent infringement by others in this Judicial District, the State of Texas, and elsewhere in the United States.

5. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1391 because, among other things, Defendant is not a resident in the United States, and thus may be sued in any judicial district pursuant to 28 U.S.C. § 1391(c)(3).

6. Defendant is subject to this Court's jurisdiction pursuant to due process and/or the Texas Long Arm Statute due at least to its substantial business in this State and Judicial District, including (a) at least part of its past infringing activities, (b) regularly doing or soliciting business in Texas, and/or (c) engaging in persistent conduct and/or deriving substantial revenue from goods and services provided to customers in Texas.

PATENTS-IN-SUIT

7. On September 6, 2011, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,014,943 (the "'943 Patent") entitled "Method and System for Displaying Social Networking Navigation Information". A true and correct copy of the '943 Patent is available at: <https://pdfpiw.uspto.gov/.piw?PageNum=0&docid=8014943>.

8. On October 4, 2011, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,032,297 (the "'297 Patent") entitled "Method and System for Displaying Navigation Information on an Electronic Map". A true and correct copy of the '297 Patent is available at: <https://pdfpiw.uspto.gov/.piw?PageNum=0&docid=8032297>.

9. On August 12, 2014, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,805,416 (the "'416 Patent") entitled "Method and System for

Mobile Device Selectively Reporting of GPS Position Information to Others”. A true and correct copy of the ’416 Patent is available at: <https://pdfpiw.uspto.gov/.piw?PageNum=0&docid=8805416>.

10. NorthStar is the sole and exclusive owner of all right, title, and interest in the Patent, the ’943 Patent, the ’297 Patent, and the ’416 Patent (collectively, the “Patents-in-Suit”) and holds the exclusive right to take all actions necessary to enforce its rights to the Patents-in-Suit, including the filing of this patent infringement lawsuit. NorthStar also has the right to recover all damages for past, present, and future infringement of the Patents-in-Suit and to seek injunctive relief as appropriate under the law.

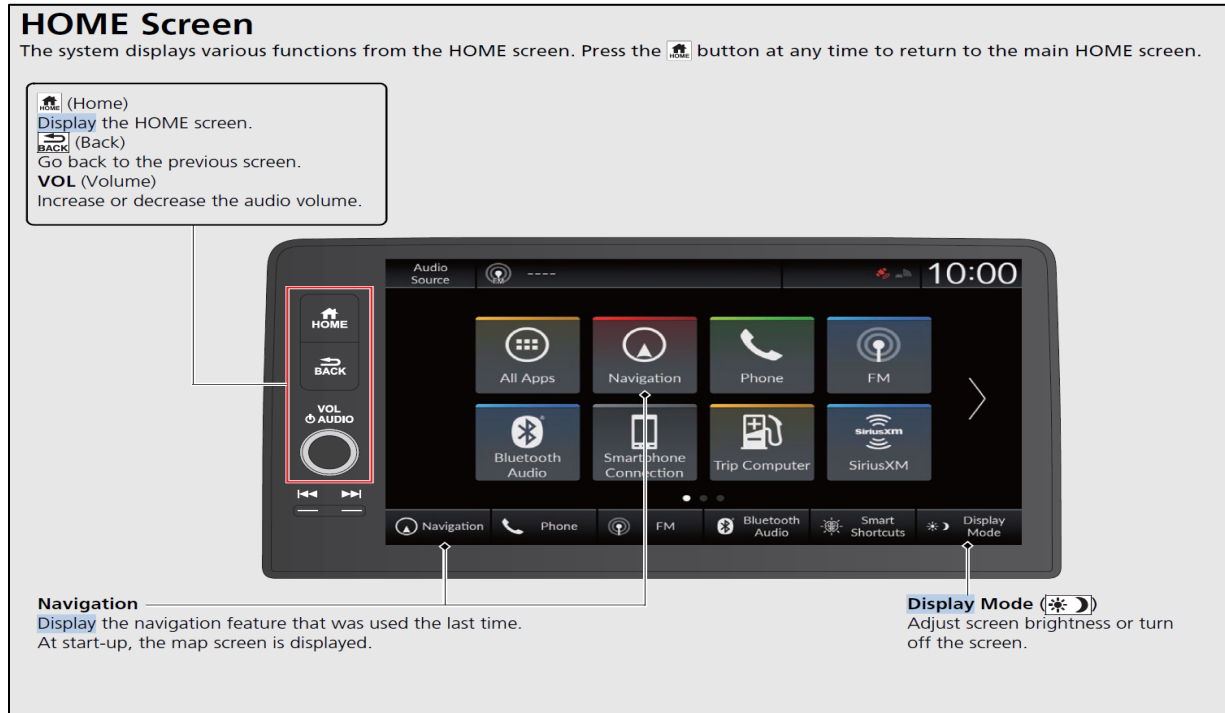
FACTUAL ALLEGATIONS

11. The ’943 Patent and the ’297 Patent generally disclose methods for displaying and generating object vector indicators referenced on an electronic map. On information and belief, the technology described in the ’943 Patent and the ’297 Patent was developed by inventor Gabriel Jakobson. For example, this technology is implemented in Honda’s navigation system, including, but not limited to, the HondaLink®, included in personal vehicles, such as the Honda Civic, Honda Insight, Honda Accord, Honda Clarity, Honda HR-V, Honda CR-V, Honda Pilot, Honda Passport, Honda Odyssey, and Honda Ridgeline, among other vehicles.

12. The ’416 Patent generally relates to detecting signal interference from a wireless device and receiving and displaying navigation information. The technology described in the ’416 Patent was developed by inventor Scott Harris. For example, this technology is implemented in Honda’s navigation system, including, but not limited to, the HondaLink®, included in personal vehicles, such as the Honda Civic, Honda Insight, Honda Accord, Honda Clarity, Honda HR-V, Honda CR-V, Honda Pilot, Honda Passport, Honda Odyssey, and Honda Ridgeline, among other

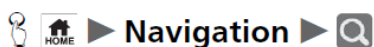
vehicles.

13. The accused Honda navigation system is implemented through a display in Honda vehicles:

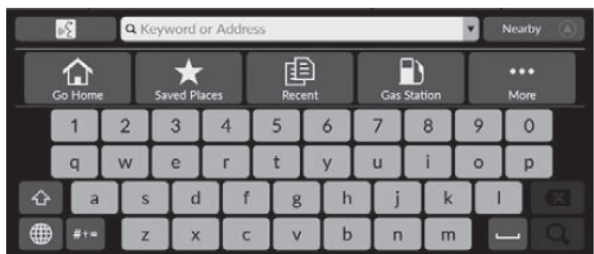


14. The Honda navigation system can search for destinations, both within the available map preview or outside the map preview:

¹ <https://owners.honda.com/vehicles/information/2022/Civic%20Sedan/features/Honda-Satellite-Linked-Navigation-System/1/honda-satellite-linked-navigation-system-with-voice-recognition25-and-realtime-traffic-pdf>.




This section describes how to enter a destination for route guidance.



Select an option.

The following options are available:

- : Sets a destination by voice control system.
 - **Using Voice Commands** P. 6
 - **Voice Control Operation** P. 12
- **Keyword or Address**: Sets a destination by entering a category, name, address, Intersection (Street 1 / Street 2), city name, or state name.
 - **Using the Search Bar** P. 63
- **Nearby/Map/Route**: Sets a search method for keyword.
- **Go Home**: Sets your home address as the destination.
 - **Going Home** P. 9
- **Saved Places**: Sets a destination by selecting a place stored in the saved list.
 - **Saved Places** P. 74
- **Recent**: Sets a destination by selecting a previous destination.
 - **Recent** P. 74
- **Gas Station**: Sets a destination by gas station.
 - **Gas Station** P. 75
- **More**: Sets a destination by selecting a category.
 - **More** P. 76
- **Keyword Search**: Displays the keyboard.

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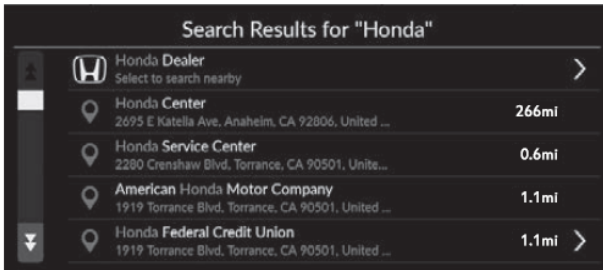
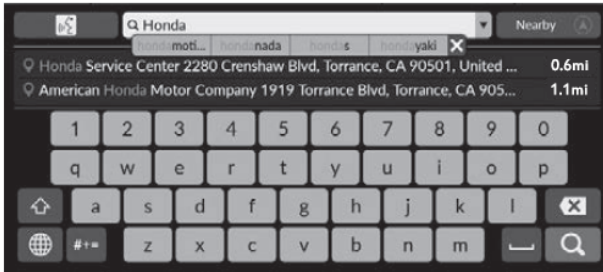
15. The Honda navigation system allows for searching locations through a manual input of destination information:

² *Id.*

Using the Search Bar



You can use the search bar to search for locations by entering a category, name, address, Intersection (Street 1 / Street 2), city name, or state name.



1. Enter a search term.
 - ▶ The nearest locations by corresponding to the search word are displayed below the search bar.
 - ▶ Suggested search terms appear below the search bar as you type.
2. Select or a nearest location on below the search bar.
 - ▶ If you select nearest location, proceed to step 4.
3. Select your destination from the list.
4. Select **Go** to set the route to your destination.

Calculating the Route P. 78

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16. The Honda navigation system also allows searching for destinations through “categories” of destinations:

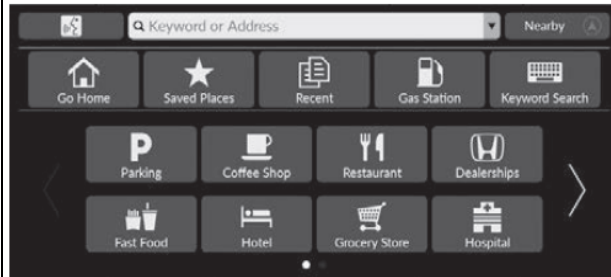
³ *Id.*

More

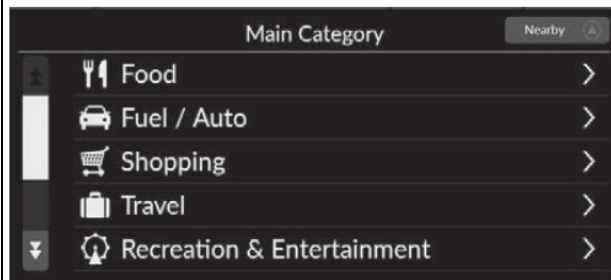
Select the category of a place (e.g., Restaurants, Gas Stations, Shopping) stored in the map database to search for the destination.

Finding a Location by Category

Navigation ► More



1. Select a category.
 - If you select other than Categories, proceed to step 3.



2. Select a subcategory.



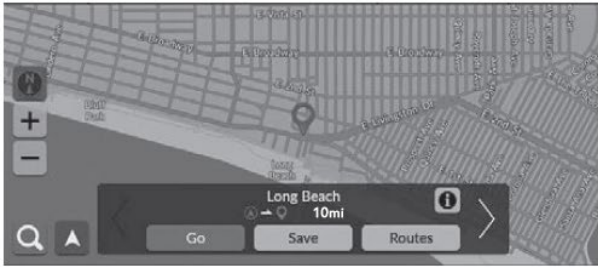
3. Select a place name from the list.
4. Select Go to set the route to your destination.

► Calculating the Route P. 78

17. Once a destination is selected in the Honda navigation system, the system calculates distance and routes from the vehicle's current location to the selected destination, displaying the destination and the surrounding area:

⁴ *Id.*

This section describes how to calculate your route.



Select Go.

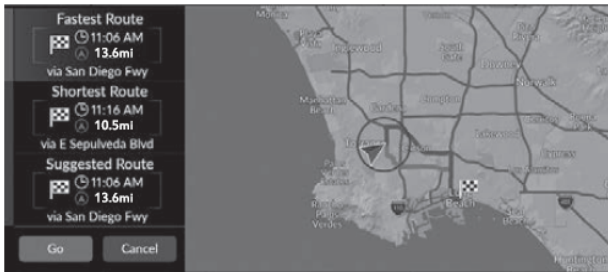
- ▶ The system calculates and displays the route line on the map screen.

5

18. The Honda navigation system allows the selection of different routes from the vehicle's current location to the selected destination, displaying the vehicle's current location relative to the destination along various calculated routes:

Viewing and Selecting the Routes

View and select different routes to your destination.



1. Select your desired route.

- ▶ The estimated arrival time and travel distance are displayed for each route.

2. Select Go.

- ▶ The system calculates and displays the route line on the map screen.

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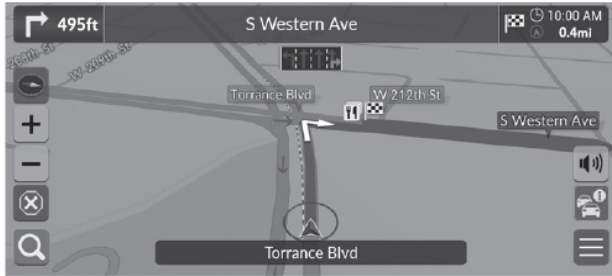
19. When traveling along a route calculated by the Honda navigation system, the system displays other locations that fall within various types of location categories. This functionality allows a driver to change the calculated route to the original destination, creating an alternate route whereby the vehicle can take a detour:


⁵ *Id.*

⁶ *Id.*




Stopping the Route

Stop the route guidance and remove the destination and all waypoints.



Select .

Taking a Detour

  ► **Navigation** ►  ► **Route Options** ► **Detour** (when en route)

Calculate a new route to avoid something ahead of you. The system creates a new route if possible and attempts to get you back on your original route as quickly as possible.

⁷

20. Honda has infringed and is continuing to infringe the Patents-in-Suit by making, using, selling, offering to sell, and/or importing, and by actively inducing others to make, use, sell, offer to sell, and/or importing commercial and personal vehicles, including, but not limited to, personal cars. On information and belief, personal cars, such as the Honda vehicles, in all trims and specifications, infringe the Patents-In-Suit.

⁷ *Id.*

COUNT I
(Infringement of the '943 Patent)

21. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

22. NorthStar has not licensed or otherwise authorized Defendant to make, use, offer for sale, sell, or import any products that embody the inventions of the '943 Patent.

23. Defendant has and continues to directly infringe the '943 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '943 Patent. Such products include, but are not limited to, Honda's navigation system, including, but not limited to, the HondaLink®, included in personal vehicles, such as the Honda Civic, Honda Insight, Honda Accord, Honda Clarity, Honda HR-V, Honda CR-V, Honda Pilot, Honda Passport, Honda Odyssey, and Honda Ridgeline, among other vehicles.

24. Defendant has and continues to directly infringe at least claim 1 of the '943 Patent by making, using, offering to sell, selling, and/or importing into the United States products such as the Honda navigation system. On information and belief, the Honda navigation perform the method of displaying, on an electronic map, object vector indicators referencing social-network map-objects. The Honda navigation system provides an electronic device with a map-display application that is coupled to a mapping service, a social network (*e.g.*, Waze, Android Auto and Google Maps), and a display for displaying a selected area of the electronic map. The Honda navigation system, performs the step of authenticating (*e.g.*, using an account with Waze, Android Auto and Google Maps) the social network and obtains map-objects from the social network. The Honda navigation system performs the step of determining that coordinates of the map-objects are outside the selected electronic map area. The Honda navigation system performs the step of

computing the distance and travel information from a location within the selected area to one of the map-objects. The Honda navigation system performs the step of computing a placement position of an object vector indicator referencing the map-object on the display application. The Honda navigation system performs the step of creating the object vector indicators with the distance and travel-related information and displaying the object vector indicators on the display. The Honda navigation system performs the step of receiving a user input selecting the object vector indicators and displaying a secondary area of the electronic map, which contains a region of the electronic map centered approximately around the map object and displaying them in the center of the secondary area. As set forth above, the Honda navigation system displays route guidance centered on map objects.

25. On information and belief, the Honda Civic can couple with a mobile phone with the social media applications installed (*e.g.*, the Waze, Android Auto and Google Maps) to display social network information and map objects on the Honda navigation system.⁸

26. Defendant has and continues to indirectly infringe one or more claims of the '943 Patent by knowingly and intentionally inducing others, including Honda customers and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States products that include infringing technology.

27. Defendant, with knowledge that these products, or the use thereof, infringe the '943 Patent at least as of the date of this Complaint, knowingly and intentionally induced, and continues

⁸ <https://drivingconnective.com/can-i-link-waze-to-honda-civic/>.

to knowingly and intentionally induce, direct infringement of the '943 Patent by providing these products to end-users for use in an infringing manner.

28. Defendant has and continues to induce infringement by others, including end-users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end-users, infringe the '943 Patent, but while remaining willfully blind to the infringement.

29. NorthStar has suffered damages as a result of Defendant's direct and indirect infringement of the '943 Patent in an amount to be proved at trial.

30. NorthStar has suffered, and will continue to suffer, irreparable harm as a result of Defendant's infringement of the '943 Patent, for which there is no adequate remedy at law, unless Defendant's infringement is enjoined by this Court.

COUNT II
(Infringement of the '297 Patent)

31. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

32. NorthStar has not licensed or otherwise authorized Defendant to make, use, offer for sale, sell, or import any products that embody the inventions of the '297 Patent.

33. Defendant has and continues to directly infringe the '297 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '297 Patent. Such products include, but are not limited to, Honda's navigation system, including, but not limited to, the HondaLink®, included in personal vehicles, such as the Honda Civic, Honda Insight, Honda Accord, Honda Clarity, Honda

HR-V, Honda CR-V, Honda Pilot, Honda Passport, Honda Odyssey, and Honda Ridgeline, among other vehicles.

34. Defendant has and continues to directly infringe at least claim 1 of the '297 Patent by making, using, offering to sell, selling, and/or importing into the United States products such as the Honda navigation system. The Honda navigation system performs a method that displays, on an electronic map, object vector indicators referencing map-objects. Honda navigation system provides an electronic device having a map-display application that is coupled to a mapping service and a display for displaying a selected area of an electronic map. Honda navigation system determines that coordinates of the map object are not in the selected area of the electronic map, (e.g., when a user inputs a point of interest destination). Honda navigation system computes distance and travel-related information from a location within the selected area of the electronic map (e.g., the user's current location), to the map-object. The Honda navigation system computes a placement position of an object vector indicator referencing the map-object on the map-display application. The Honda navigation system creates the object vector indicator containing the distance and travel-related information (e.g., arrival time). The Honda navigation system further displays the object vector indicator on the display at the computed placement position. The Honda navigation system receives user input selecting the object vector indicator and displays a second area of the electronic map, wherein the secondary area is a region of the electronic map centered approximately around the map-object. The Honda navigation system displays the map-object approximately at the center of the secondary area. As set forth above, the Honda navigation system displays route guidance centered on map objects.

35. Defendant has and continues to indirectly infringe one or more claims of the '297 Patent by knowingly and intentionally inducing others, including Honda customers and end-users,

to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States products that include infringing technology.

36. Defendant, with knowledge that these products, or the use thereof, infringe the '297 Patent at least as of the date of this Complaint, knowingly and intentionally induced, and continues to knowingly and intentionally induce, direct infringement of the '297 Patent by providing these products to end-users for use in an infringing manner.

37. Defendant has and continues to induce infringement by others, including end-users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end-users, infringe the '297 Patent, but while remaining willfully blind to the infringement.

38. NorthStar has suffered damages as a result of Defendant's direct and indirect infringement of the '297 Patent in an amount to be proved at trial.

39. NorthStar has suffered, and will continue to suffer, irreparable harm as a result of Defendant's infringement of the '297 Patent, for which there is no adequate remedy at law, unless Defendant's infringement is enjoined by this Court.

COUNT III
(Infringement of the '416 Patent)

40. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

41. NorthStar has not licensed or otherwise authorized Defendant to make, use, offer for sale, sell, or import any products that embody the inventions of the '416 Patent.

42. Defendant has and continues to directly infringe the '416 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '416 Patent. Such products include, but are not

limited to, Honda's navigation system, including, but not limited to, the HondaLink®, included in personal vehicles, such as the Honda Civic, Honda Insight, Honda Accord, Honda Clarity, Honda HR-V, Honda CR-V, Honda Pilot, Honda Passport, Honda Odyssey, and Honda Ridgeline, among other vehicles.

43. Defendant has and continues to directly infringe at least claim 1 of the '416 Patent by making, using, offering to sell, selling, and/or importing into the United States products such as the Honda navigation system. On information and belief, the Honda navigation system performs a method of receiving, by a mobile communication device, wherein information about a current location of the mobile communication device includes GPS information. Through the mobile communication device, the Honda navigation system detects signal interference. The Honda navigation system generates an indication of the signal interference. The Honda navigation system communicates, by the mobile communication device, (e.g., the Honda navigation system and/or telematics system and/or a cellular device), with a remote source over a wireless network. The Honda navigation system further sends both the indication of the signal interference and the GPS information from the mobile communication device to the remote source. The Honda navigation system further receives, by the mobile communication device, navigation information from the remote source in response to sending both the indication of the signal interference and the GPS information, wherein the navigation information comprises data for plotting a course on

a map including the current location of the mobile communication device. The Honda navigation system further displays the map based on the navigation information.

44. As set forth above, the Honda navigation system displays route guidance centered on map objects.

45. Defendant has and continues to indirectly infringe one or more claims of the '416 Patent by knowingly and intentionally inducing others, including Honda customers and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States products that include infringing technology.

46. Defendant, with knowledge that these products, or the use thereof, infringe the '416 Patent at least as of the date of this Complaint, knowingly and intentionally induced, and continues to knowingly and intentionally induce, direct infringement of the '416 Patent by providing these products to end-users for use in an infringing manner.

47. Defendant has and continues to induce infringement by others, including end-users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end-users, infringe the '416 Patent, but while remaining willfully blind to the infringement.

48. NorthStar has suffered damages as a result of Defendant's direct and indirect infringement of the '416 Patent in an amount to be proved at trial.

49. NorthStar has suffered, and will continue to suffer, irreparable harm as a result of Defendant's infringement of the '416 Patent, for which there is no adequate remedy at law, unless Defendant's infringement is enjoined by this Court.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury for all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, EGT prays for relief against Defendant as follows:

- a. Entry of judgment declaring that Defendant has directly and/or indirectly infringed one or more claims of the Patents-in-Suit;
- b. An order pursuant to 35 U.S.C. § 283 permanently enjoining Defendant, its officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them, from further acts of infringement of one or more of the Patents-in-Suit;
- c. An order awarding damages sufficient to compensate NorthStar for Defendant's infringement of the Patents-in-Suit, but in no event less than a reasonable royalty, together with interest and costs;
- d. Entry of judgment declaring that this case is exceptional and awarding NorthStar its costs and reasonable attorney fees under 35 U.S.C. § 285; and
- e. Such other and further relief as the Court deems just and proper.

Dated: May 11, 2022

Respectfully submitted,

/s/ Vincent J. Rubino, III

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