

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

FLEET CONNECT SOLUTIONS LLC,

Plaintiff,

V.

ENTERPRISE HOLDINGS, INC., and
ENTERPRISE FLEET MANAGEMENT,
INC.,

Defendants.

Civil Action No. 6:24-cv-00116

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Fleet Connect Solutions LLC (hereinafter, “Fleet Connect” or “Plaintiff”) files this First Amended Complaint against Enterprise Holdings, Inc. (hereinafter, “Enterprise Holdings”) and Enterprise Fleet Management, Inc. (hereinafter, “Enterprise Fleet Management” and collectively with Enterprise Holdings, “Enterprise” or “Defendants”) alleging, based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

NATURE OF THE ACTION

1. This is a patent infringement action to stop Defendants’ infringement of the following United States Patents (collectively, the “Asserted Patents”):

	Patent	Title	Available At:
1	6,429,810	Integrated Air Logistics System	USPTO.GOV, https://patentcenter.uspto.gov/applications/09774547 , https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/6429810
2	8,005,053	Channel Interference Reduction	USPTO.GOV, https://patentcenter.uspto.gov/applications/12696760 , https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/8005053

	Patent	Title	Available At:
3	8,862,184	System And Methods For Management Of Mobile Field Assets Via Wireless Handheld Devices	USPTO.GOV, https://patentcenter.uspto.gov/applications/13925692 , https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/8862184
4	6,941,223	Method And System For Dynamic Destination Routing	USPTO.GOV, https://patentcenter.uspto.gov/applications/10339663 , https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/6941223
5	6,961,586	Field Assessments Using Handheld Data Management Devices	USPTO.GOV, https://patentcenter.uspto.gov/applications/09955543 , https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/6961586
6	6,633,616	OFDM Pilot Tone Tracking For Wireless LAN	USPTO.GOV, https://patentcenter.uspto.gov/applications/09935081 , https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/6633616
7	7,463,896	System And Method For Enforcing A Vehicle Code	USPTO.GOV, https://patentcenter.uspto.gov/applications/11524850 , https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/7463896
8	6,647,270	Vehicle Talk	USPTO.GOV, https://patentcenter.uspto.gov/applications/09659074 , https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/6647270

2. Plaintiff seeks monetary damages.

PARTIES

3. Plaintiff is a limited liability company formed under the laws of Texas with its registered office address located in Austin, Texas.

4. On information and belief, Enterprise Holdings is a corporation organized under the laws of the State of Missouri with its principal place of business located at 600 Corporate Park Drive, St. Louis, Missouri 63105. Enterprise Holdings may be served through its registered agent

for service in Texas, CT Corporation System, located at 1999 Bryan St., STE 900, Dallas, Texas 75201.

5. On information and belief, Enterprise Fleet Management is a corporation organized under the laws of the State of Missouri with its principal place of business located at 600 Corporate Park Drive, St. Louis, Missouri 63105. Enterprise Fleet Management may be served through its registered agent for service in Texas, CT Corporation System, located at 1999 Bryan St., STE 900, Dallas, Texas 75201.

6. On information and belief, “Enterprise Truck Rental is a service of the Enterprise Rent-A-Car brand, which is owned by Enterprise Holdings, the largest car rental company in the world.” Enterprise Truck Rental, LINKEDIN, <https://www.linkedin.com/company/enterprise-commercial-trucks/>.

JURISDICTION AND VENUE

7. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

8. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject matter jurisdiction of the action under 28 U.S.C. § 1331 and § 1338(a).

9. Venue is proper against Defendants in this District pursuant to 28 U.S.C. § 1400(b) because they maintain an established and regular place of business in this District and have committed acts of patent infringement in this District. *See In re: Cray Inc.*, 871 F.3d 1355, 1362–1363 (Fed. Cir. 2017).

10. On information and belief, Defendants have a regional office at 4210 S Congress Ave., Austin, TX 78745, where they sell, offer for sale, use, service, and deliver the Accused Products.

See ENTERPRISE FLEET MANAGEMENT, <https://www.efleets.com/en/locations/austin.html>; see also ENTERPRISE TRUCKS, https://www.enterprisetrucks.com/truckrental/en_US/locations/us/e165m3-austin.html.

11. Defendants are subject to this Court's specific and general personal jurisdiction under due process and/or the Texas Long Arm Statute due at least to Defendants' substantial business in this judicial district, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, or deriving substantial revenue from goods and services provided to individuals in Texas and in this district.

12. Specifically, Defendants intend to do and do business in, have committed acts of infringement in this District directly, and offer their services, including those accused of infringement here, to customers and potential customers located in Texas, including in the Western District of Texas.

13. On information and belief, Enterprise Fleet Management owns, operates, manages, conducts business, and directs and controls the operations and employees of facilities at several locations in this District, including, but not limited to, facilities at the following addresses: (1) 4210 S Congress Ave., Austin, TX 78745; and (2) 1505 Harry Wurzbach Rd., San Antonio, TX 78209. See ENTERPRISE FLEET MANAGEMENT, <https://www.efleets.com/en/locations/texas.html>.

14. On information and belief, Enterprise Holdings owns, operates, manages, conducts business, and directs and controls the operations and employees of facilities at several locations in this District, including, but not limited to, facilities at the following addresses: (1) 4210 S Congress Ave., Austin, TX 78745; (2) 8321 Lazy Ln, Austin, TX 78757; (3) 10907 N FM 620, Austin, TX 78726; (4) 10150 Mcallister Fwy, San Antonio, TX 78216; (5) 8422 Lakeside Pkwy, San Antonio, TX 78245; and (6) 236 S Ww White Rd, San Antonio, TX 78219. See ENTERPRISE TRUCKS,

https://www.enterprisetrucks.com/truckrental/en_US/locations.html.

15. In addition, Defendants advertise that “Every Flex-E-Rent vehicle is equipped with Geotab telematics providing real-time reporting.” ENTERPRISE TRUCKS, https://www.enterprisetrucks.com/content/dam/truckrental/en_us/flexerent/M01652ETRFlex-E-Rent-WhitePaper_R2_digital.pdf.

16. Defendants have committed acts of infringement from this District, including, but not limited to, use of the Accused Products.

THE ASSERTED PATENTS AND ACCUSED PRODUCTS

17. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

18. Defendants use, cause to be used, sell, offer for sale, import, provide, supply, or distribute one or more fleet management platform and tracking solutions, including, but not limited to, Geotab telematics devices, including Geotab GO Devices such as the GO7, GO8, GO9, GO9 RUGGED, GO9+, Geotab Go devices (<https://www.geotab.com/blog/geotab-go-device-past-present-future/>), and compatible Geotab Input Output Expanders (“IOX”) (and any and all predecessor and successor models, names, or releases) with Electronic Logging Device (“ELD”), Hours of Service (“HOS”), and Driver-Vehicle Inspection Report (“DVIR”) tools, MyGeotab Fleet Management Software, Geotab Drive, Geotab Fleet Routing and Optimization Software, Geotab Go Anywhere Asset Tracking System, Geotab ELD solutions, Geotab Vehicle Tracking devices, the Enterprise Fleet Management Portal, the eFleets client portal, the eFleets Mobile app, and other substantially similar products and services offered in the past or the future, and all of the prior models, iterations, releases, versions, generations, and prototypes of the foregoing, along with any

associated hardware, software, functionality, and applications associated with those products and solutions (hereinafter, “Accused Products”). See **Figures 1–10** (below).

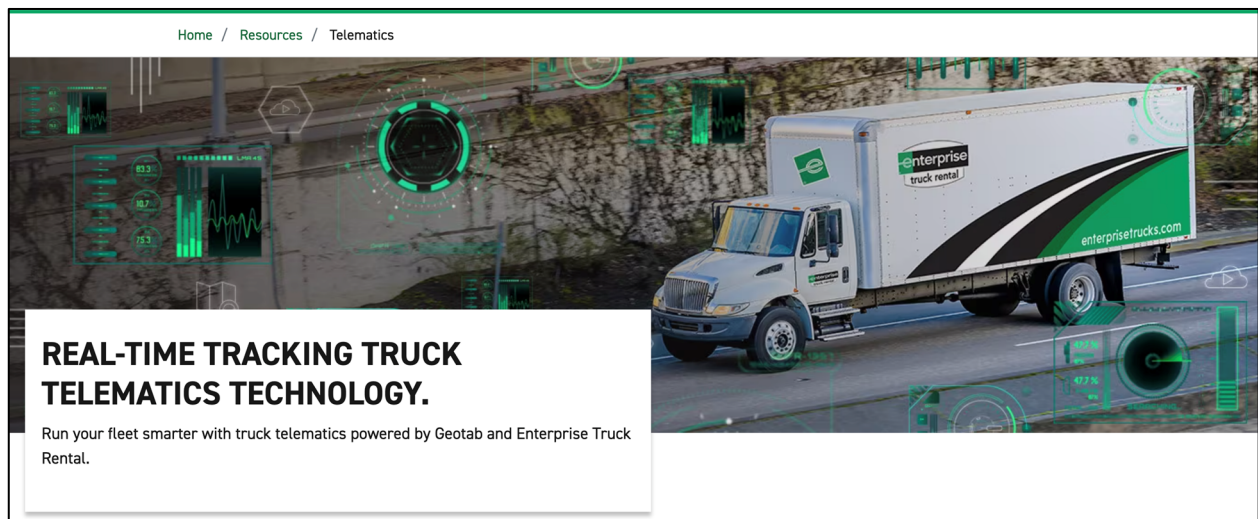


Figure 1

Source: ENTERPRISE TRUCKS,

https://www.enterprisetrucks.com/truckrental/en_US/resources/telematics.html.

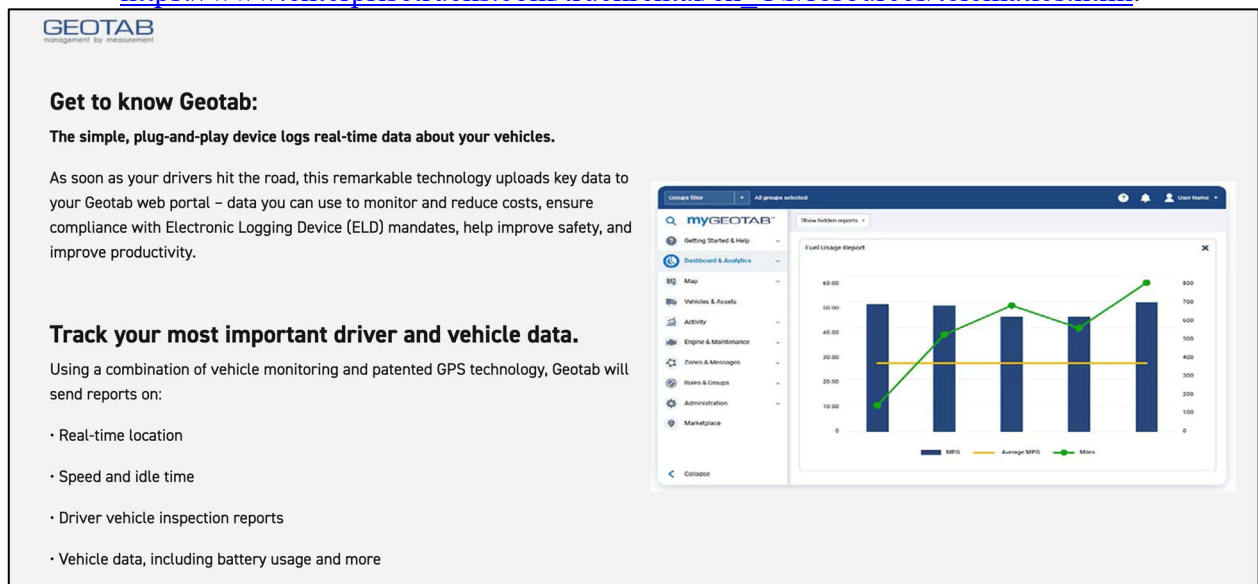


Figure 2

Source: ENTERPRISE TRUCKS,

https://www.enterprisetrucks.com/truckrental/en_US/resources/telematics.html.

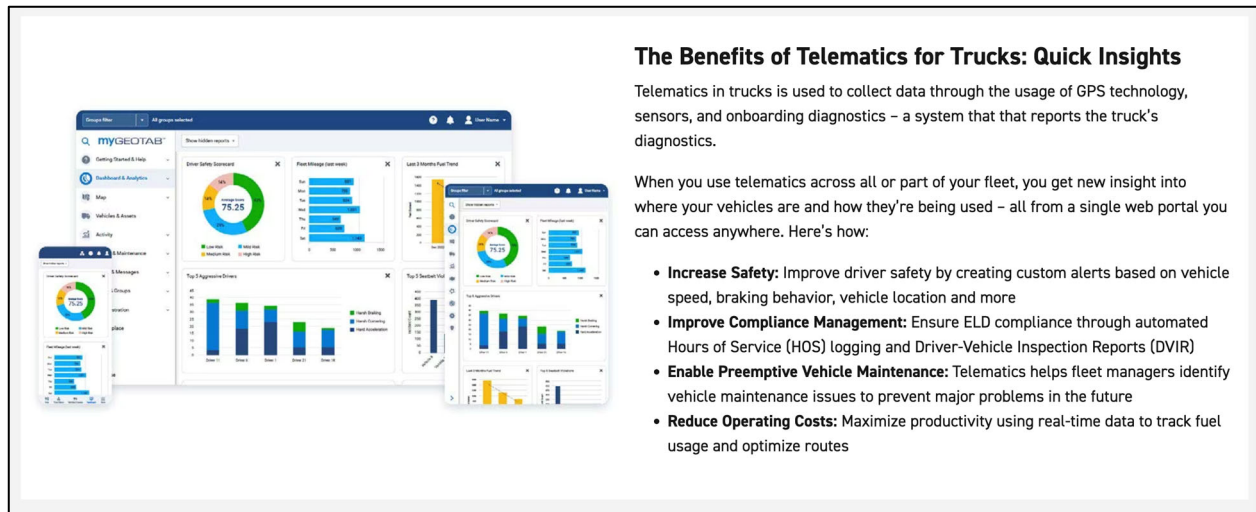


Figure 3

Source: ENTERPRISE TRUCKS,

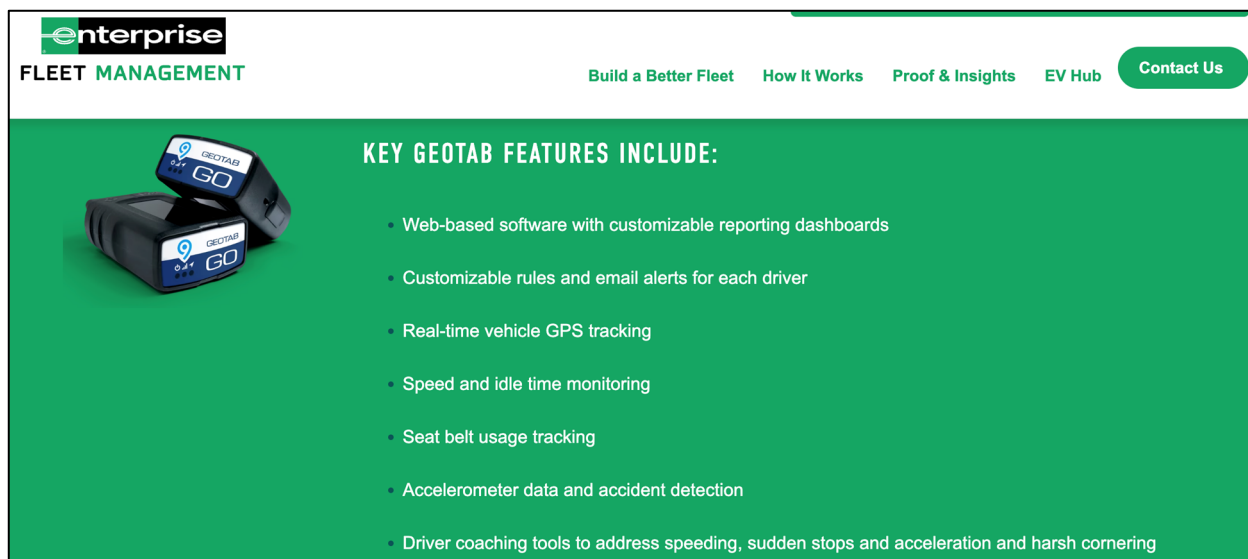
https://www.enterprisetrucks.com/truckrental/en_US/resources/telematics.html.

Real-time reporting and tracking	E-TRACK	E-TRIPS	E-MANAGE
GPS tracking with fast acquisition time (Patented technology)	✓	✓	✓
Customizable rules for productivity, safety and maintenance	✓	✓	✓
Device tampering detection	✓	✓	✓
Driver speed tracking	✓	✓	✓
Idle time tracking including location and stop reports	✓	✓	✓
Easily create, edit and import zones with notifications	✓	✓	✓
Editable reporting functionality -customize organization, schedule and priority	✓	✓	✓
View multiple map types: Bing, Google, Open Street, and more	✓	✓	✓
Supports unlimited vehicles and users with flexible user access	✓	✓	✓
Access to Add-ons via Geotab Marketplace partner network	✓	✓	✓
Audit abilities with all database actions	✓	✓	✓
Acceleration data: Accident detection & notification			✓
Driving in reverse (if available)			✓
Vehicle Data: VIN, ODO, seatbelt usage, enriched engine data, battery, and fuel information	✓ (VIN/ODO only)	✓ (VIN/ODO only)	✓
Driver behavior coaching			
Intelligent in-vehicle driver coaching (Limitations Apply. Available in English, Spanish, French, Italian, German)	✓	✓	✓
Dashboard reports - visual trending, driver scorecards, violations	✓	✓	✓
Send messages and routes to drivers with compatible Garmin PNDs	✓	✓	✓
In-vehicle alerts			
Idling	✓	✓	✓
Driver identification with NFC reader	✓	✓	✓
Speeding	✓	✓	✓
Aggressive driving (hard acceleration, braking, cornering)			✓
Vehicle diagnostics			
Intelligent monitoring of battery health and drain	✓	✓	✓
Maintenance reminders* (schedule by time or distance)	✓	✓	✓
Maintenance reminders by engine data parameters*			✓
CO2 emissions monitoring*			✓
Fuel usage (idle fuel usage, fuel up events, theft, fuel card integration)			✓
Notifications for vehicle breakdown, check engine light and engine faults			✓
Regulatory compliance			
Driver Vehicle Inspection Report (DVIR) via Drive App	✓	✓	✓
Hours of Service with Drive App and automatic status update		✓	✓
Automated IFTA recording information & reports			✓

Figure 4

Source: ENTERPRISE TRUCKS,

https://www.enterprisetrucks.com/content/dam/truckrental/en_us/bupdf/H03722%20Geotab%20Sales%20Flyer_Low%20Res.pdf.



enterprise
FLEET MANAGEMENT

Build a Better Fleet How It Works Proof & Insights EV Hub [Contact Us](#)

KEY GEOTAB FEATURES INCLUDE:

- Web-based software with customizable reporting dashboards
- Customizable rules and email alerts for each driver
- Real-time vehicle GPS tracking
- Speed and idle time monitoring
- Seat belt usage tracking
- Accelerometer data and accident detection
- Driver coaching tools to address speeding, sudden stops and acceleration and harsh cornering

Figure 5

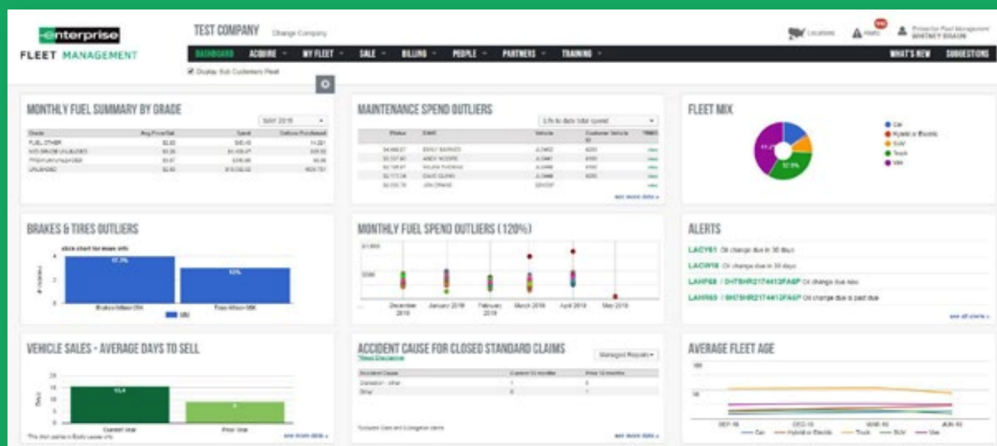
Source: ENTERPRISE FLEET MANAGEMENT, <https://www.efleets.com/en/resources/telematics-program.html>.

**Figure 6**

Source: GEOTAB, <https://support.geotab.com/oem-integration/doc/drive-cloud-eld>.

YOUR ENTERPRISE FLEET MANAGEMENT WEBSITE INCLUDES:

- Customizable dashboards to ensure you get the data you need in as few clicks as possible
- Big picture data that easily drills down to information about specific vehicles and drivers
- Tailored reporting and labeling options to match your existing accounting terms and structures



LOG IN TO YOUR WEBSITE TO:

- **Set up drivers with access to the mobile app** and others with necessary access to the client website, as needed
- **Create custom vehicle descriptors** to help your company allocate and track costs by projects, region or vehicle class
- **Review vehicle performance** and maintenance information in real time
- **Schedule and send alerts** to drivers for maintenance, registrations and recalls
- **Verify or update information** like vehicle descriptors, assigned drivers, mileage information and more
- **Sort data** by a variety of fields and parameters, including driver or vehicle, to view current and historical information
- **Access and verify all risk management claims** (if subscribed)
- **Develop custom reports** to display, sort and filter the information you need
- **Export data** in multiple formats to fit your business needs

Figure 7

Source: ENTERPRISE FLEET MANAGEMENT, <https://www.efleets.com/content/dam/efleets/PDF/us-onboarding/enterprise-fleet-client-website-resource.pdf>, available at ENTERPRISE FLEET MANAGEMENT, <https://www.efleets.com/en/resources/client-portal-website.html>.

	Input/Output <ul style="list-style-type: none"> • Buzzer • LEDs — Ignition, GPS, Cellular • IOX (more details below) • Internal GPS/Cellular antennas
Cellular	Availability varies by certification. GO9+ LTE ATT/TELUS/Rogers <ul style="list-style-type: none"> • LTE (CAT-4): Bands 2/4/5/12 • 3GPP Compliant
GPS receiver	72-channel engine (GPS/GLONASS/Beidou/Galileo/SBAS/WAAS/EGNOS/MSAS/GAGAN) <ul style="list-style-type: none"> • Under 1 second Time-To-First Fix for hot and aided starts • Cold start: 26s • Concurrent GPS & GLONASS system • A-GNSS • Accuracy: ~2.0 m CEP • OTA FW updates supported
Onboard Wi-Fi	Supports WPA2+AES security protocol Supports up to 10 simultaneous connections 802.11 b/g/n 2.4 GHz DL range: 0–25 Mbps UL range: 0–10 Mbps

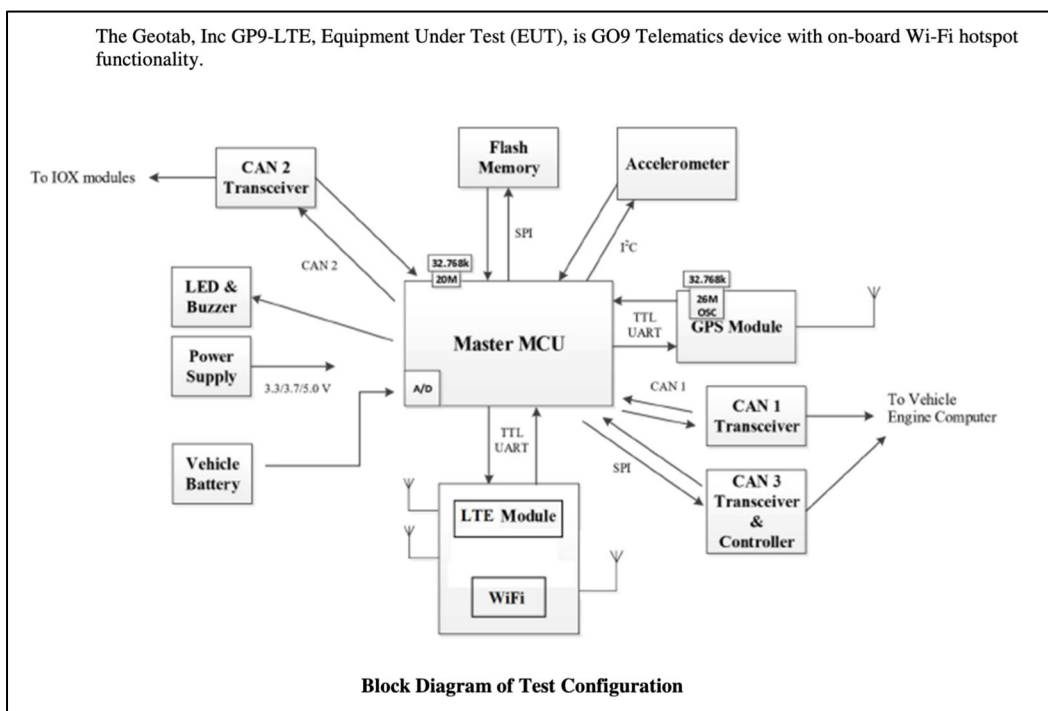
Figure 8

Source: GEOTAB, <https://gtb.page.link/8C7f>; *see also* FCCID.IO, <https://fccid.io/2AV57GP9LTE/Users-Manual/User-Manual-4761398.pdf>.

Integrated Module Info:	<ul style="list-style-type: none"> ❖ Cellular: <ul style="list-style-type: none"> ▪ Module name : Wistron NeWeb ▪ Model number : M18Q2F-1 ▪ FCC ID : NKRM18Q2 ▪ IC ID : 4441A-M18Q2 ❖ WLAN (Wi-Fi): <ul style="list-style-type: none"> ▪ Module name : Qualcomm Chipset ▪ Model number : 9377
H.W Version:	A
S.W Version:	123
Regulatory Band:	<ul style="list-style-type: none"> ❖ Cellular : <ul style="list-style-type: none"> ▪ UMTS Band II : 1852.4 ~ 1907.6 MHz ▪ UMTS Band V : 826.4 ~ 846.6 MHz ▪ LTE Band 2 : 1850 ~ 1910 MHz ▪ LTE Band 4 : 1710 ~ 1755 MHz ▪ LTE Band 5 : 824.0 ~ 849 MHz ▪ LTE Band 12 : 699 ~ 716 MHz ❖ WLAN (Wi-Fi): <ul style="list-style-type: none"> ▪ <u>802.11b, g, n</u> : Center to center: 2412 MHz (ch 1) – 2462 MHz (ch 11), 11 channels.

Figure 9

Source: FCCID.IO, <https://fccid.io/2AV57GP9LTE/RF-Exposure-Info/MPE-Report-4764607.pdf> at 5–6.

**Figure 10**

Source: FCCID.IO, <https://fccid.io/2AV57GP9LTE/Test-Report/Test-Report-DTS-5378584.pdf> at 12.

19. The Accused Products perform wireless communications and methods associated with performing and/or implementing wireless communications including, but not limited to, wireless communications and methods pursuant to various protocols and implementations, including, but not limited to, LTE, Bluetooth, IEEE 802.11, and LTE protocols and various subsections thereof, including, but not limited to, 802.11ac, 802.11b, and 802.11n.

20. The wireless communications perform and/or implemented by the Accused Products, among other things, transmit data over various media, compute time slot channels, generate packets for network transmissions, perform or cause to be performed error estimation in orthogonal frequency division multiplexed (“OFDM”) receivers, and various methods of processing OFDM symbols.

21. For these reasons and the additional reasons detailed below, the Accused Products

practice at least one claim of each of the Asserted Patents.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,429,810

22. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

23. Fleet Connect owns all substantial rights, interest, and title in and to U.S. Patent No. 6,429,810 (the “’810 patent”), including the sole and exclusive right to prosecute this action and enforce the ’810 patent against infringers and to collect damages for all relevant times.

24. The United States Patent and Trademark Office (“USPTO”) duly issued the ’810 patent on August 6, 2002, after full and fair examination of Application No. 09/774,547 which was filed January 31, 2001. *See* ’810 patent at 1.

25. The claims of the ’810 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of preexisting logistics and tracking systems.

26. The written description of the ’810 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

27. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the ’810 patent.

28. Upon information and belief, Defendants have directly infringed one or more claims of

the '810 patent, based at least on Defendants manufacturing, selling, offering for sell, importing, using, providing, supplying, or distributing the Accused Products.

29. Upon information and belief, Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '810 patent, as detailed in Attachment A to the Preliminary Infringement Contentions, served on Defendants on June 11, 2024, which is incorporated by reference herein.

30. More specifically, and as just one example of infringement detailed in Attachment A to the Preliminary Infringement Contentions, Defendants, using the Accused Products, perform a method of providing container status information to a user. The method includes attaching an electronic communications unit to a shipping container; generating a transaction identification code, wherein said transaction identification code is specific to said shipping container and specific to at least one user transaction; initiating a status inquiry utilizing said transaction identification code, wherein said user performs said initiating step; receiving said status inquiry by a ground communications system; transmitting said status inquiry to said electronic communications unit by said ground communications system; obtaining a status information response by said electronic communications unit; transmitting said status information response to said ground communications system by said electronic communications unit; and forwarding said status information response to said user by said ground communications system.

31. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II: INFRINGEMENT OF U.S. PATENT NO. 8,005,053

32. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

33. The USPTO duly issued the '053 patent on August 23, 2011, after full and fair examination of Application No. 12/696,760, which was filed on January 29, 2010. *See* '053 patent at 1.

34. Fleet Connect owns all substantial rights, interest, and title in and to the '053 patent, including the sole and exclusive right to prosecute this action and enforce the '053 patent against infringers and to collect damages for all relevant times.

35. The claims of the '053 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of voice and data communications systems.

36. The written description of the '053 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

37. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '053 patent.

38. Upon information and belief, Defendants have directly infringed one or more claims of the '053 patent, based at least on Defendants manufacturing, selling, offering for sell, importing, using, providing, supplying, or distributing the Accused Products.

39. Upon information and belief, Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 10 of the '053 patent, as detailed in Attachment B to the Preliminary Infringement Contentions, served on Defendants on June 11, 2024, which is incorporated by reference herein.

40. More specifically, and as just one example of infringement detailed in Attachment B to the Preliminary Infringement Contentions, Defendants, using the Accused Products, perform a method comprising a communication device storing data encoded for a plurality of different wireless protocols, the communication device including a plurality of wireless transceivers, each of which is configured to transmit data according to a corresponding one of the plurality of different wireless protocols where the communication device selects one of the plurality of different wireless protocols and encodes data of an unselected one of the plurality of different wireless protocols into the selected wireless protocol, and transmits the encoded data using the one of the plurality of wireless transceivers corresponding to the selected wireless protocol.

41. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT III: INFRINGEMENT OF U.S. PATENT NO. 8,862,184

42. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

43. Fleet Connect owns all substantial rights, interest, and title in and to U.S. Patent No. 8,862,184 (the "'184 patent"), including the sole and exclusive right to prosecute this action and enforce the '184 patent against infringers and to collect damages for all relevant times.

44. The USPTO duly issued the '184 patent on October 14, 2014, after full and fair examination of Application No. 13/925,692, which was filed on June 24, 2013. *See* '184 patent at 1.

45. The claims of the '184 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of preexisting methods and systems of collecting and communicating field data based on geographical location.

46. The written description of the '184 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

47. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '184 patent.

48. Upon information and belief, Defendants have directly infringed one or more claims of the '184 patent, based at least on Defendants manufacturing, selling, offering for sell, importing, using, providing, supplying, or distributing the Accused Products.

49. Upon information and belief, Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '184 patent, as detailed in Attachment C to the Preliminary Infringement Contentions, served on Defendants on June 11, 2024, which is incorporated by reference herein.

50. More specifically, and as just one example of infringement detailed in Attachment C

to the Preliminary Infringement Contentions, Defendants, using the Accused Products, perform a method, comprising downloading a field assessment program to a handheld device from a server geographically distant from the handheld device; executing the field assessment program on the handheld device, the field assessment program configured to enable assessment of a job; collecting data associated with the job in response to prompts from the field assessment program; obtaining information associated with a location of the job based at least in part on determining the location of the job; rendering the collected data using the handheld device based at least in part on the obtained information; and providing the assessment of the job in response to the rendering.

51. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 6,941,223

52. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

53. U.S. Patent No. 6,941,223 (the “’223 patent”) was issued on September 6, 2005 after full and fair examination by the USPTO of Application No. 10/339,663 which was filed on January 10, 2003. *See* ’223 patent at 1.

54. The claims of the ’223 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of preexisting routing and navigation systems.

55. The written description of the '223 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

56. Fleet Connect owns all substantial rights, interest, and title in and to the '223 patent, including the sole and exclusive right to prosecute this action and enforce it against infringers and to collect damages for all relevant times.

57. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '223 patent.

58. Upon information and belief, Defendants have directly infringed one or more claims of the '223 patent, based at least on Defendants manufacturing, selling, offering for sell, importing, using, providing, supplying, or distributing the Accused Products.

59. Upon information and belief, Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 19 of the '223 patent, as detailed in Attachment D to the Preliminary Infringement Contentions, served on Defendants on June 11, 2024, which is incorporated by reference herein.

60. More specifically, and as just one example of infringement detailed in Attachment D to the Preliminary Infringement Contentions, Defendants, using the Accused Products, perform a method for destination routing of a vehicle. The method includes the acts of: determining, based on static information, an optimal route, receiving additional information, determining, based on a comparison of real travel parameters of the vehicle with travel parameters associated with the

optimal route, whether the optimal route remains optimal, and determining a new optimal route when the optimal route does not remain optimal, wherein the new optimal route is determined using the additional information, wherein the travel parameters include at least one of travel time and traveled distance.

61. Fleet Connect is entitled to recover from Defendants the damages sustained by Plaintiff as a result of Defendants' wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT V: INFRINGEMENT OF U.S. PATENT NO. 6,961,586

62. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

63. The USPTO duly issued U.S. Patent No. 6,961,586 (hereinafter, the "'586 patent") on November 1, 2005 after full and fair examination of Application No. 09/955,543 which was filed on September 17, 2001. *See* '586 patent at 1.

64. Fleet Connect owns all substantial rights, interest, and title in and to the '586 patent, including the sole and exclusive right to prosecute this action and enforce the '586 patent against infringers and to collect damages for all relevant times.

65. The claims of the '586 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of preexisting communication systems and methods for executing field operations using handheld devices.

66. The written description of the '586 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-

conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

67. Upon information and belief, Defendants have directly infringed one or more claims of the '586 patent, based at least on Defendants manufacturing, selling, offering for sell, importing, using, providing, supplying, or distributing the Accused Products.

68. Upon information and belief, Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 9 of the '586 patent, as detailed in Attachment E to the Preliminary Infringement Contentions, served on Defendants on June 11, 2024, which is incorporated by reference herein.

69. More specifically, and as just one example of infringement detailed in Attachment E to the Preliminary Infringement Contentions, Defendants, using the Accused Products, perform a method of conducting a field assessment using a handheld data management device, comprising: providing a hand held data management device user performing as a field assessor access to an industry-specific field assessment program module for enabling the field assessor to execute at least one of the following field assessments: construction industry project analysis, HVAC system analysis; project management, equipment readiness, system and equipment troubleshooting, remote inventory tracking and ordering, conducting legal investigations in the field, and multi-users remote function coordination; executing said program module to conduct the field assessment; providing field-specific information required by said program module for said program module to render data in support of said field assessment; and retrieving data through said handheld data management device in support of said field assessment.

70. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the '586 patent.

71. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT VI: INFRINGEMENT OF U.S. PATENT NO. 6,633,616

72. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

73. Fleet Connect owns all substantial rights, interest, and title in and to the '616 patent, including the sole and exclusive right to prosecute this action and enforce the '616 patent against infringers and to collect damages for all relevant times.

74. The United States Patent and Trademark Office duly issued the '616 patent on October 14, 2003, after full and fair examination of Application No. 09/935,081 which was filed August 21, 2001. *See* '616 patent at 1.

75. The claims of the '616 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of preexisting error estimation methods in orthogonal frequency division multiplexed (OFDM) systems.

76. The written description of the '616 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and

improved upon what may have been considered conventional or generic in the art at the time of the invention.

77. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '616 patent.

78. Upon information and belief, Defendants have directly infringed one or more claims of the '616 patent, based at least on Defendants manufacturing, selling, offering for sell, importing, using, providing, supplying, or distributing the Accused Products.

79. Upon information and belief, Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 12 of the '616 patent, as detailed in Attachment F to the Preliminary Infringement Contentions, served on Defendants on June 11, 2024, which is incorporated by reference herein.

80. More specifically, and as just one example of infringement detailed in Attachment F to the Preliminary Infringement Contentions, Defendants, using the Accused Products, perform a method of pilot phase error estimation in an orthogonal frequency division multiplexed (OFDM) receiver. The method includes determining pilot reference points corresponding to a plurality of pilots of an OFDM preamble waveform; processing, in a parallel path to the determining step, the OFDM preamble waveform with a fast Fourier transform; determining a phase error estimate of a subsequent OFDM symbol relative to the pilot reference points; and processing, in the parallel path to the determining step, the subsequent OFDM symbol with the fast Fourier transform; wherein the determining the phase error estimate step is completed prior to the completion of the processing the subsequent OFDM symbol with the fast Fourier transform in the parallel path.

81. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT VII: INFRINGEMENT OF U.S. PATENT NO. 7,463,896

82. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

83. The USPTO duly issued U.S. Patent No. 7,463,896 (hereinafter, the “’896 patent”) on December 9, 2008 after full and fair examination of Application No. 11/542,850 which was filed on September 20, 2006. *See* ’896 patent at 1. A Certificate of Correction was issued on August 13, 2013. *See id.* at 18.

84. Fleet Connect owns all substantial rights, interest, and title in and to the ’896 patent, including the sole and exclusive right to prosecute this action and enforce the ’896 patent against infringers and to collect damages for all relevant times.

85. The claims of the ’896 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of preexisting systems for wireless vehicle tracking systems.

86. The written description of the ’896 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

87. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '896 patent.

88. Upon information and belief, Defendants have directly infringed one or more claims of the '896 patent, based at least on Defendants manufacturing, selling, offering for sell, importing, using, providing, supplying, or distributing the Accused Products.

89. Upon information and belief, Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '896 patent, as detailed in Attachment G to the Preliminary Infringement Contentions, served on Defendants on June 11, 2024, which is incorporated by reference herein.

90. More specifically, and as just one example of infringement detailed in Attachment G to the Preliminary Infringement Contentions, Defendants, using the Accused Products, perform a method for enforcing a vehicle code. The method includes receiving a wireless communication signal by a first mobile unit having a unique identifier, the wireless communication signal transmitted by a second mobile unit associated with a vehicle; downconverting data in the received wireless communication signal from radio frequency to baseband; determining based on the downconverted data: a vehicle identifier associated with the vehicle, and a GPS position associated with the vehicle; determining by a system administrator a status of the vehicle using the vehicle identifier to monitor the vehicle for code enforcement, wherein the determining the status includes parsing the received wireless communication signal to determine the status of the vehicle; generating baseband message data indicating the status by constructing at least one data packet from a plurality of data fields, the data fields including the unique identifier of the first mobile unit and the vehicle identifier; and upconverting the baseband message data to radio frequency for

transmission to the second mobile unit, thereby transmitting the upconverted baseband message data indicating the status of the vehicle.

91. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT VIII: INFRINGEMENT OF U.S. PATENT NO. 6,647,270

92. Fleet Connect repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

93. Fleet Connect owns all substantial rights, interest, and title in and to U.S. Patent No. 6,647,270 (the “’270 patent”), including the sole and exclusive right to prosecute this action and enforce the ’270 patent against infringers and to collect damages for all relevant times.

94. The USPTO duly issued the ’270 patent on November 11, 2003, after full and fair examination of Application No. 09/659,074 which was filed September 11, 2000. *See* ’270 patent at 1.

95. The claims of the ’270 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of mobile communications and tracking systems.

96. The written description of the ’270 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of

the invention.

97. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '270 patent.

98. Upon information and belief, Defendants have directly infringed one or more claims of the '270 patent, based at least on Defendants manufacturing, selling, offering for sell, importing, using, providing, supplying, or distributing the Accused Products.

99. Upon information and belief, Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '270 patent, as detailed in Attachment H to the Preliminary Infringement Contentions, served on Defendants on June 11, 2024, which is incorporated by reference herein.

100. More specifically, and as just one example of infringement detailed in Attachment H to the Preliminary Infringement Contentions, Defendants, using the Accused Products, provide a system for transmitting voice or data communications comprising a plurality of data packets between a plurality of remote units, each remote unit having a unique identifier; whereby each remote unit includes: a memory for storing a unique identifier; a transceiver for receiving a wireless communication and downconverting said received communication from RF to baseband, and for upconverting a baseband communication to RF for transmission as a transmit wireless communication; a GPS receiver, for outputting a position signal; a microprocessor, for receiving said position signal and said downconverted communication, and for generating said baseband communication; whereby said microprocessor generates said baseband communication by constructing said data packets from a plurality of data fields, including sender information and receiver information, whereby said sender information includes: the unique identifier of the sender,

and information derived from said position signal; and whereby said receiver information includes: the address of the desired remote unit.

101. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

DEMAND FOR JURY TRIAL

102. Fleet Connect hereby requests a trial by jury on all issues so triable by right.

PRAYER FOR RELIEF

103. WHEREFORE, Fleet Connect requests that the Court find in its favor and against Defendants, and that the Court grant Fleet Connect the following relief:

- a. Judgment that one or more claims of each of the Asserted Patents has been infringed, either literally or under the doctrine of equivalents, by Defendants or others acting in concert therewith;
- b. Judgment that Defendants account for and pay to Fleet Connect all damages to and costs incurred by Fleet Connect because of Defendants' infringing activities and other conduct complained of herein;
- c. Pre-judgment interest on the damages caused by Defendants' infringing activities and other conduct complained of herein;
- d. That this Court declare this an exceptional case and award Fleet Connect its reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and
- e. All other and further relief as the Court may deem just and proper under the circumstances.

Dated: June 11, 2024

Respectfully submitted,

By: /s/ James F. McDonough, III

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List of Supportive Links

1. U.S. Patent No. 6,429,810, USPTO.GOV,
<https://patentcenter.uspto.gov/applications/09774547> , <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6429810>.
2. U.S. Patent No. 8,005,053, USPTO.GOV,
<https://patentcenter.uspto.gov/applications/12696760>, <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8005053>.
3. U.S. Patent No. 8,862,184, USPTO.GOV,
<https://patentcenter.uspto.gov/applications/13925692>, <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8862184>.
4. U.S. Patent No. 6,941,223, USPTO.GOV,
<https://patentcenter.uspto.gov/applications/10339663>, <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6941223>.
5. U.S. Patent No. 6,961,586, USPTO.GOV,
<https://patentcenter.uspto.gov/applications/09955543>, <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6961586>.
6. U.S. Patent No. 6,633,616, USPTO.GOV,
<https://patentcenter.uspto.gov/applications/09935081>, <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6633616>.

7. U.S. Patent No. 7,463,896, USPTO.GOV, <https://patentcenter.uspto.gov/applications/11524850>, <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7463896>.
8. U.S. Patent No. 6,647,270, USPTO.GOV, <https://patentcenter.uspto.gov/applications/09659074>, <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6647270>.
9. ENTERPRISE TRUCKS, https://www.enterprisetrucks.com/truckrental/en_US/resources/telematics.html.
10. ENTERPRISE TRUCKS, https://www.enterprisetrucks.com/content/dam/truckrental/en_us/bupdf/H03722%20Geotab%20Sales%20Flyer_Low%20Res.pdf.
11. ENTERPRISE FLEET MANAGEMENT, <https://www.efleets.com/en/resources/telematics-program.html>.
12. GEOTAB, <https://support.geotab.com/oem-integration/doc/drive-cloud-eld>.
13. ENTERPRISE FLEET MANAGEMENT, <https://www.efleets.com/content/dam/efleets/PDF/us-onboarding/enterprise-fleet-client-website-resource.pdf>.
14. ENTERPRISE FLEET MANAGEMENT, <https://www.efleets.com/en/resources/client-portal-website.html>.
15. GEOTAB, <https://gtb.page.link/8C7f>.
16. FCCID.IO, <https://fccid.io/2AV57GP9LTE/Users-Manual/User-Manual-4761398.pdf>.
17. FCCID.IO, <https://fccid.io/2AV57GP9LTE/RF-Exposure-Info/MPE-Report-4764607.pdf>.
18. FCCID.IO, <https://fccid.io/2AV57GP9LTE/Test-Report/Test-Report-DTS-5378584.pdf>.

CERTIFICATE OF SERVICE

I hereby certify that on this day a true and correct copy of the foregoing document was filed electronically with the Clerk of Court using the Court's CM/ECF system. As such, this document was served on all counsel who are deemed to have consented to electronic service.

Dated: June 11, 2024

By: /s/ James F. McDonough, III

James F. McDonough, III