

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Minotaur Systems LLC,

Plaintiff,

v.

Netradyne, Inc.,

Defendant.

Case No. 1:24-cv-00352-JLH

Patent Case

Jury Trial Demanded

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

1. Plaintiff Minotaur Systems LLC (“Plaintiff”), through its attorneys, complains of Netradyne, Inc. (“Defendant”), and alleges the following:

PARTIES

2. Plaintiff Minotaur Systems LLC is a corporation organized and existing under the laws of 261 West 35th St, Suite 1003, New York, NY 10001 that maintains its principal place of business at Delaware.

3. Defendant Netradyne, Inc. is a corporation organized and existing under the laws of Delaware that maintains an established place of business at 9171 Towne Centre Dr #110, San Diego, CA 92122.

JURISDICTION

4. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

5. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendant because it has engaged in systematic and continuous business activities in this District and is incorporated in this District's state. As described below, Defendant has committed acts of patent infringement giving rise to this action within this District.

VENUE

7. Venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant has an established place of business in this District. In addition, Defendant has committed acts of patent infringement in this District, and Plaintiff has suffered harm in this district.

PATENT-IN-SUIT

8. Plaintiff is the assignee of all right, title and interest in United States Patent No. 7,386,376 (the "Patent-in-Suit"); including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the Patent-in-Suit. Accordingly, Plaintiff possesses the exclusive right and standing to prosecute the present action for infringement of the Patent-in-Suit by Defendant.

THE '376 PATENT

9. The '376 Patent is entitled "Vehicle visual and non-visual data recording system," and issued 2008-06-10. The application leading to the '376 Patent was filed on 2003-01-27. A true and correct copy of the '376 Patent is attached hereto as Exhibit 1 and incorporated herein by reference.

10. Prior to the inventions of the '376 Patent, investigations into traffic and other vehicular accidents were hampered by human error and the limited capacities of human investigators. There was a need for "a system capable of recording, reproducing and analyzing information pertaining to an accident," particularly since such a system "would be much more

accurate” than human investigators would be, “since the system will be able to provide precise data prior to, during, and after the accident.” ’376 Patent, 1:28-34.

11. Prior to the inventions of the ’376 Patent, although conventional “devices” were “proposed as visual/non-visual vehicular data recorders,” such devices were seen to “fall short in several areas.” ’376 Patent, 1:35-37.

12. For example, among other deficiencies, conventional devices did not record occupant data. ’376 Patent, 1:66.

13. Likewise, “existing video recording systems require[d] multiple conventional cameras, often placed in intrusive locations within the vehicle compartment,” and made “no use of the visual data to infer occupant position, to anticipate eccentric conditions, or to determine the nature of the vehicle’s occupants.” ’376 Patent, 2:4-8.

14. In contrast to conventional vehicular data recorders and video recording system, the unconventional and inventive system claimed in the ’376 Patent was “unique from existing video/vehicle data recording systems, both in terms of functionality and possible applications.” ’376 Patent, 2:27-29.

15. For example, “[t]he set of sensors employed” in the system claimed in the ’376 Patent is “unique as it incorporates traditional vehicle data sensors” as well as “novel occupant status sensors, video information, and biometric sensors in order to anticipate an impending eccentric condition, and to maintain a complete record of the vehicle and occupant status prior to an event.” ’376 Patent, 2:29-35.

16. According to the system claimed in the ’376 Patent, “[r]eal-time data analysis is performed to detect and to recognize vehicle occupants, and recognize impending eccentric events,” such as vehicular collisions. ’376 Patent, Abstract.

17. According to the system claimed in the '376 Patent, “non-traditional data sensors are used that maintain a record of events such as occupant position/ height/weight, cellular phone use, and child seat presence.” '376 Patent, 2:39-41.

18. The system claimed in the '376 Patent employed an inventive and unconventional “set of vehicle and occupant sensors, and the use of video data in both an active and passive manner,” which was “unique in comparison to existing visual/non-visual data recording systems.” '376 Patent, 2:51:54.

19. The system claimed in the '376 Patent also employed an inventive and unconventional “interface system, which combines an in-vehicle interface, a computer interface, and a remote interface” which was “unique in comparison to the interface systems described in prior patent documents, both in terms of functionality and possible end-use applications.” '376 Patent, 3:32-36.

20. These inventive concepts are captured in the “data capture module” and “continuously synchronizing” limitations of Claim 1 of the '376 Patent.

21. For example, the inventive and unconventional “data capture module” of Claim 1 is a “novel occupant status sensor[]” and “non-traditional data sensor,” which records “occupant data,” in contrast to conventional devices which did not record “occupant data.” The “data capture module” allows “for an increasingly complete record log of the vehicle’s occupants,” improving the accuracy of investigations into vehicular accidents, can also be used “in anticipation of eccentric conditions,” improving the odds of avoiding collisions. '376 Patent, 5:34-37.

22. Similarly, the “continuously synchronizing” limitation of Claim 1 of '376 Patent, whereby the “occupant data” captured by the “data capture module” and the “vehicle data”

recorded by the “data recorder” is “continuously synchronized,” so that “[r]eal-time data analysis [can be] performed to detect and to recognize vehicle occupants, and recognize impending eccentric events,” such as vehicular collisions. ’376 Patent, Abstract.

23. None of the claimed functionality of the system of Claim 1 of ’376 Patent was previously performed by human beings, or can be performed in the human mind. For example, human beings cannot “continuously synchronize” “occupant data” and “vehicle data.”

COUNT 1: INFRINGEMENT OF THE ’376 PATENT

24. Plaintiff incorporates the above paragraphs herein by reference.

25. **Direct Infringement.** Defendant has been and continues to directly infringe one or more claims of the ’376 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the “Exemplary Defendant Products”) that infringe at least the exemplary claims of the ’376 Patent also identified in the charts incorporated into this Count below (the “Exemplary ’376 Patent Claims”) literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the ’376 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

26. Defendant also has and continues to directly infringe, literally or under the doctrine of equivalents, the Exemplary ’376 Patent Claims, by having its employees internally test and use these Exemplary Products.

27. **Actual Knowledge of Infringement.** The service of this Complaint, in conjunction with the attached claim charts and references cited, constitutes actual knowledge of infringement as alleged here.

28. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer for sale, market, and/or import into the United States, products that infringe the '376 Patent. On information and belief, Defendant has also continued to sell the Exemplary Defendant Products and distribute product literature and website materials inducing end users and others to use its products in the customary and intended manner that infringes the '376 Patent. See Exhibit 2 (extensively referencing these materials to demonstrate how they direct end users to commit patent infringement).

29. **Induced Infringement.** At least since being served by this Complaint and corresponding claim charts, Defendant has actively, knowingly, and intentionally continued to induce infringement of the '376 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to their customers for use in end-user products in a manner that infringes one or more claims of the '376 Patent.

30. Exhibit 2 includes charts comparing the Exemplary '376 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '376 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '376 Patent Claims.

31. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 2.

32. Plaintiff is entitled to recover damages adequate to compensate for Defendant's infringement.

JURY DEMAND

33. 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 respectfully requests the following relief:

- A. A judgment that the '376 Patent is valid and enforceable
- B. A judgment that Defendant has infringed directly and indirectly one or more claims of the '376 Patent;
- C. An accounting of all damages not presented at trial;
- D. A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284 for Defendant's continuing or future infringement, up until the date such judgment is entered with respect to the '376 Patent, including pre- or post-judgment interest, costs, and disbursements as justified under 35 U.S.C. § 284;
- E. And, if necessary, to adequately compensate Plaintiff for Defendant's infringement, an accounting:
 - i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and that Plaintiff be awarded its reasonable attorneys fees against Defendant that it incurs in prosecuting this action;
 - ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this action; and

iii. that Plaintiff be awarded such further relief at law or in equity as the Court deems just and proper.

Dated: July 11, 2024

Respectfully submitted,

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