

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	Case No.
	§	
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
	§	
v.	§	
	§	
MOTOROLA SOLUTIONS, INC.,	§	
	§	
Defendant.	§	
	§	
	§	

PLAINTIFF’S COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff AGIS Software Development LLC (“AGIS Software” or “Plaintiff”) files this Complaint against Defendant Motorola Solutions, Inc. (“Motorola” or “Defendant”) for patent infringement under 35 U.S.C. § 271 and alleges as follows:

THE PARTIES

1. Plaintiff AGIS Software is a limited liability company, organized and existing under the laws of the State of Texas, and maintains its principal place of business at 100 W. Houston Street, Marshall, Texas 75670. AGIS Software is the owner of all right, title, and interest in and to U.S. Patent Nos. 8,213,970, 9,445,251, 9,467,838, 9,820,123, and 9,749,829 (the “Patents-in-Suit”).

2. On information and belief, Defendant Motorola, the successor-in-interest to Motorola, Inc., is a corporation organized and existing under the laws of the State of Delaware and maintains a place of business in this District at: 415 East Exchange Parkway, Allen, Texas 75002 and 1501 10th Street, Suite 130, Plano, Texas 75074. Motorola is registered to conduct business

in the State of Texas and has a registered agent at CT Corp System, 1999 Bryan Street, Suit. 900, Dallas, Texas 75201.

3. On information and belief, Defendant directly and/or indirectly develops, designs, manufactures, distributes, markets, offers for sale, and/or sells infringing products and services in the United States, including in the Eastern District of Texas, and otherwise directs infringing activities to this District in connection with its products and services.

JURISDICTION AND VENUE

4. 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 subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1338(a), and 1367.

5. This Court has specific and personal jurisdiction over Defendant in this action because Defendant has committed acts within this Judicial District giving rise to this action and has established minimum contacts with this forum, such that the exercise of jurisdiction over Defendant would not offend traditional notions of fair play and substantial justice. Defendant 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 by, among other things, offering to sell and selling products and/or services that infringe the Patents-in-Suit.

6. Motorola is a publicly-traded company, and, at least since 2016, has marketed, distributed, and encouraged use of certain applications and services that gather location-based information from multiple data sources and systems and organizes it on real-time maps for display in the command center or on mobile devices in the field. Since as early as 2016, Defendant has marketed these functionalities under several applications and services.

7. Motorola owns 138,000 square feet of space in Allen, Texas, located at 415 East Exchange Parkway, Allen, Texas 75002, for manufacturing and distribution, and corporate administrative purposes.¹ On information and belief, personnel based in Motorola's Allen, Texas space, are involved in selling, marketing, and supporting end-customer use of Motorola's customer-aided dispatch and intelligence-led public safety solutions including, for example, Motorola's CommandCentral Inform, CommandCentral Aware, SmartMapping, SmartMessaging, and Astro 25 Mission Critical Data.

8. On information and belief, Motorola also maintains corporate offices in this District, specifically at 420 East Exchange Parkway, Allen, Texas² and Carrollton, Texas, and employs individuals in this District.³

9. In addition, Motorola leases about 136,000 square feet of property in the city of Richardson, Texas, located at 2910 Telecom Parkway, Richardson, Texas 75082, and uses the property for manufacturing and distribution purposes.⁴ Limitations on or closures of Defendant's manufacturing facilities and distribution centers in Texas could have a material adverse impact on its ability to manufacture products and service customers. As the successor-in-interest to Motorola, Inc., Defendant Motorola changed its name from Motorola, Inc. to Motorola Solutions, Inc. in 2011, and has been registered to do business in the State of Texas since 1973.

¹ <https://www.motorolasolutions.com/newsroom/press-releases/motorola-solutions-acquires-watchguard-inc-leader-in-mobile-video-for-publi.html>

² <https://www.waze.com/live-map/directions/motorola-solutions-e-exchange-pkwy-420-allen?to=place.w.172556619.1725828336.7911781>

³ <https://www.indeed.com/cmp/Motorola-Solutions/locations/TX>

⁴ https://www.motorolasolutions.com/en_xu/about/subsidiaries.html;
<https://www.motorolasolutions.com/newsroom/press-releases/motorola-solutions-opens-new-facility-in-richardson-texas-manufacturing-nda.html>

10. Venue is proper in this Judicial District pursuant to 28 U.S.C. §§ 1391 and 1400(b) because Defendant has regular and established places of business in this Judicial District. Defendant, through its own acts and/or through the acts of others, makes, uses, sells, distributes, exports from, imports, and/or offers to sell infringing products within this Judicial District, regularly does and solicits business in this Judicial District, and has the requisite minimum contacts with this Judicial District, such that this venue is a fair and reasonable one.

PATENTS-IN-SUIT

11. On July 3, 2012, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,213,970 (the “’970 Patent”) entitled “Method of Utilizing Forced Alerts for Interactive Remote Communications.” On September 1, 2021, the United States Patent and Trademark Office issued an *Inter Partes* Review Certificate for the ’970 Patent cancelling claims 1 and 3-9. On December 9, 2021, the United States Patent and Trademark Office issued an *Ex Parte* Reexamination Certificate for the ’970 Patent determining claims 2 and 10 (as amended) and claims 11-13 to be valid and patentable. A true and correct copy of the ’970 Patent, which includes the September 1, 2021 *Inter Partes* Review Certificate and the December 9, 2021 *Ex Parte* Reexamination Certificate, is attached here to as Exhibit A.

12. On September 13, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,445,251 (the “’251 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” On June 8, 2021, the United States Patent and Trademark Office issued an *Ex Parte* Reexamination Certificate of the ’251 Patent determining claims 1-35 to be valid and patentable. A true and correct copy of the ’251 Patent, which includes the June 8, 2021 *Ex Parte* Reexamination Certificate, is attached hereto as Exhibit B.

13. On October 11, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,467,838 (the “’838 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” On May 27, 2021, the United States Patent and Trademark Office issued an *Ex Parte* Reexamination Certificate of the ’838 Patent determining claims 1-84 to be valid and patentable. A true and correct copy of the ’838 Patent, which includes the May 27, 2021 *Ex Parte* Reexamination Certificate, is attached here to as Exhibit C.

14. On November 14, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,820,123 (the “’123 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” On September 24, 2021, the United States Patent and Trademark Office issued an *Ex Parte* Reexamination Certificate for the ’123 Patent confirming the validity and patentability of claims 1-48. A true and correct copy of the ’123 Patent, which includes the September 24, 2021 *Ex Parte* Reexamination Certificate, is attached here to as Exhibit D.

15. On August 29, 2017, the United States and Trademark Office duly and legally issued U.S. Patent No. 9,749,829 (the “’829 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” On August 16, 2021, the United States Patent and Trademark Office issued an *Ex Parte* Reexamination Certificate for the ’829 Patent confirming the validity and patentability of claims 1-68. A true and correct copy of the ’829 Patent, which includes the August 16, 2021 *Ex Parte* Reexamination Certificate, is attached here to as Exhibit E.

16. AGIS Software is the sole and exclusive owner of all rights, title, and interest in 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. AGIS Software 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

17. Malcolm K. “Cap” Beyer, Jr., a graduate of the United States Naval Academy and a former U.S. Marine, is the CEO of AGIS Software and a named inventor of the AGIS Software patent portfolio. Mr. Beyer founded Advanced Ground Information Systems, Inc. (“AGIS, Inc.”) shortly after the September 11, 2001 terrorist attacks because he believed that many first responder and civilian lives could have been saved through the implementation of a better communication system. He envisioned and developed a new communication system that would use integrated software and hardware components on mobile devices to give users situational awareness superior to systems provided by conventional military and first responder radio systems.

18. AGIS, Inc. developed prototypes that matured into its LifeRing system. LifeRing provides first responders, law enforcement, and military personnel with what is essentially a tactical operations center built into hand-held mobile devices. Using GPS-based location technology and existing or special-purpose cellular communication networks, LifeRing users can exchange location, heading, speed, and other information with other members of a group, view each other’s locations on maps and satellite images, and rapidly communicate and coordinate their efforts.

19. AGIS Software was formed in 2017 and has since opened two offices in Texas, including one office located at 2226 Washington Avenue, #2, Waco, Texas 76702. AGIS Software also maintains a data center in Texas.

20. Mr. Beyer has maintained longstanding ties to Texas and the Eastern District. In 1987, Mr. Beyer founded Advanced Programming Concepts, an Austin-based company focused

on real-time tactical command and control systems. Advanced Programming Concepts was later acquired by Ultra Electronics, Inc. and is now the Advanced Tactical Systems unit of Ultra Electronics, Inc., which is still based in Austin, Texas.

21. AGIS Software licenses its patent portfolio, including the '970, '251, '838, '123, and '829 Patents, to AGIS, Inc. AGIS, Inc. has marked its products accordingly. AGIS Software and all previous assignees of the Patents-in-Suit have complied with the requirements of 35 U.S.C. § 287(a).

22. Defendant has infringed and continues to infringe the Patents-in-Suit by making, using, selling, offering to sell, distributing, exporting from, and/or importing, and by actively inducing others to make, use, sell, offer to sell, distribute, export from, and/or import products that infringe the Patents-in-Suit. Such products include at least the Motorola CommandCentral Inform, CommandCentral Aware, SmartMapping, SmartMessaging, and Astro 25 Mission Critical Data (the "Accused Products").⁵ The Accused Products infringe each of the Asserted Patents.

⁵ See, e.g., https://www.motorolasolutions.com/en_us/products/command-center-software/public-safety-software/real-time-intelligence-operations/commandcentral-aware.html?gad_source=1&gclid=EAIaIQobChMI-p6Uh7CwhgMVFm1_AB0yKAHUEAAYASAAEgK8Z_D_BwE;
https://www.motorolasolutions.com/content/dam/msi/docs/global-software/commandcentral-aware/cc_aware_brochure_web.pdf;
<https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>;
<https://www.motorolasolutions.com/newsroom/press-releases/motorola-solutions-announces-mapping-analytics-enhancements-to-commandcentr.html>;
https://www.motorolasolutions.com/en_us/products/p25-products/apx-mission-critical-applications/smartmapping.html;
https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf;
<https://www.motorolasolutions.com/content/dam/msi/docs/astro-25/astro-25-mission-critical-data-brochure.pdf>

23. The Accused Products include functionalities that allow users to form and/or join networks or groups, share and view locations with other users, display symbols corresponding to locations (including locations of other users) on a map, and communicate with other users via text, voice, and multimedia-based communication. Additionally, the Accused Products include functionalities to allow users to form and/or join networks or groups. Additionally, the users may form groups that include their own devices in order to track their own lost or stolen devices, as shown below; to send and receive communications from their own lost or stolen Accused Products; and to remotely control the lost or stolen Accused Products. The Accused Products include the functionalities to display map information, including symbols corresponding with users, entities, and locations. Additionally, the Accused Products include functionalities to form groups that include their own devices in order to track, remotely monitor and control, and/or communicate with other users' devices. The Accused Products include functionalities to enable communications, such as voice calls between users. The Accused Products practice the claims of the Asserted Patents to improve user experiences and to improve Defendant's position in the market.

See your patrol area clearly

Whether it's responding to an emergency or managing day-to-day operations, visibility is everything.

CommandCentral Aware allows you to see all of your resources and events on a single, highly configurable map. With 9-1-1 calls, CAD incidents, radio and vehicle locations, sensors, cameras and more all together, you'll uncover new insights that inform better decisions.

Unified Resource & Incident Mapping
Bring together event and device locations on an ESRI-based map. Layer almost any GIS dataset from ArcGIS as well as traffic, weather, boundaries, landmarks, buildings and floor plans for enriched spatial orientation.

Configurable Event Monitor & Free-Text Search
Alongside the map, view events and device alerts in a table structure. Add, remove and sort data columns for individual user preferences. Quickly access active resources or events on the map using a free-text search bar.

Drag-And-Drop Modular User Interface with Custom Filtering
Configure the CommandCentral Aware display across one, two, or three screens and personalize to meet individual role needs and workflow preferences. Create and save various views of a user's map and monitor using filters based on type of event, device, geofence and other agency-defined or custom criteria.

Adjustable Resource Reporting & Breadcrumb-Style Tracking
Visualize the path of travel of devices including radios for up to 30 minutes. Device location is reported every 15 seconds but can be reconfigured to meet your needs and temporarily overridden to a three second cadence during emergencies.

Resource Affiliation & Unit Management
Preconfigure units and add associated resources to them to simplify your interface and more easily manage unit location and communications.

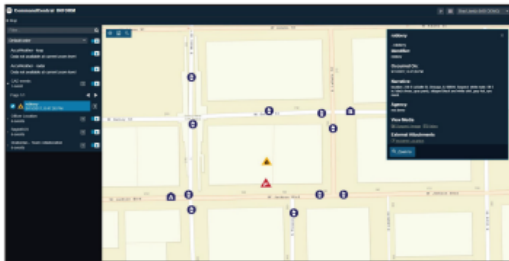
Mobile Compatible User Experience
Access the map and event monitor from any Android or iOS tablet or smartphone to extend operational visibility to anywhere you have an internet connection.

40% reduction
in violent crime by Detroit PD after implementing CommandCentral Aware

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⁶ https://www.motorolasolutions.com/content/dam/msi/docs/global-software/commandcentral-aware/cc_aware_brochure_web.pdf

Can your team easily see the information that matters? A single piece of information can often make the difference in directing the safest response. Yet, ensuring everyone has access to the right information and can quickly understand its relevance can be difficult. Keep everyone informed and in sync with a map-based common operating picture available anywhere they are, on any device from CommandCentral Inform.



REQUEST A DEMO:
Register Online at motorolasolutions.com/spssdemo

MONITOR ACTIVITY FROM ANYWHERE

View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.

ACT WITH THE NECESSARY CONTEXT

Filter your view to only the datasets you need in the moment. Access critical event information such as incident reports, video, resource details, sensor statuses and more – directly from the map.

COLLABORATE WITHOUT DISTRACTION

Your common operating picture is “view-only” with specific viewing permissions based on team. This ensures everyone is on the same page, with the information that matters.

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BENEFITS

- **Stay On Track:** Get precise location information on a modern map interface — right on your radio.
- **Stay In Touch:** View the location of other first responders at a glance. See their status. Tap to communicate.
- **Stay Up-To-Date:** SmartMapping will evolve. Get ready for custom map integration, CAD integration, voice activation and much more.

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⁷ <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

⁸ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf

ASTRO 25 DATA APPLICATIONS AVAILABLE TODAY FROM MOTOROLA SOLUTIONS



LOCATION SERVICES

ASTRO 25 OUTDOOR GPS LOCATION
Track the location of your vehicles and personnel through either a dedicated GPS receiver or the integrated GPS in your APX radio.

LOCATION ON RECEIVE
Get location updates from an APX radio on a TDMA channel, while a radio user is receiving voice audio or in hangtime during an active call.

LOCATION ON PTT
Get location updates from your radios every time they push the PTT button without adding any additional traffic load on either the data or voice channels – even receive updates during emergency calls.



FLEET MANAGEMENT

OVER THE AIR SOFTWARE UPDATE
Update your entire fleet of radios in less than a week with no service disruption.

PROGRAMMING OVER P25 (POP25)
Reprogram radios over the air, eliminating the need to bring the radios into a service shop, saving time and money.

ASTRO 25 OVER THE AIR REKEYING (OTAR)
Quickly change and manage the distribution of encryption keys over the air, increasing security and simplifying logistics of key management.



MESSAGING AND ALERTING

ASTRO 25 ADVANCED MESSAGING SOLUTIONS
Send and receive pre-programmed or free-form text messages to individuals or groups directly from two-way radios.

TALKGROUP TEXT MESSAGING
Broadcast detailed information via text to everyone in a talkgroup simultaneously.

MACH ALERT FIRE STATION AUTOMATION AND ALERTING
Alert multiple fire stations simultaneously and control elements in the firehouse such as closing doors and turning off stoves to improve response time, efficiency and safety.



MONITORING AND CONTROL

APX PERSONNEL ACCOUNTABILITY
Streamline on-scene roll calls, alert your team to changing incident situation and improve personnel safety.

SCADA & INDUSTRIAL IOT
From site security to fluid flows and electric grids, monitor and control remote sites and equipment with a variety of applications tailored to industry specific needs.

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COUNT I (Infringement of the '970 Patent)

24. Paragraphs 1 through 23 are incorporated herein by reference as if fully set forth in their entireties.

25. AGIS Software has not licensed or otherwise authorized Motorola to make, use, offer for sale, sell, distribute, export from, or import any Accused Products and/or products that embody the inventions of the '970 Patent.

⁹ <https://www.motorolasolutions.com/content/dam/msi/docs/astro-25/astro-25-mission-critical-data-brochure.pdf>.

26. Motorola infringes, contributes to the infringement of, and/or induces infringement of the '970 Patent by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States products and/or methods covered by one or more claims of the '970 Patent including, but not limited to, the Accused Products.

27. Motorola has and continues to directly infringe at least claim 10 of the '970 Patent, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products without authority and in violation of 35 U.S.C. § 271(a).

28. Motorola has and continues to indirectly infringe at least claim 10 of the '970 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products and by instructing users of the Accused Products to perform methods claimed in the '970 Patent. For example, Motorola, with knowledge that the Accused Products infringe the '970 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continues to knowingly and intentionally induce direct infringement of the '970 Patent in violation of 35 U.S.C. § 271(b).

29. For example, Motorola has indirectly infringed and continues to indirectly infringe at least claim 10 of the '970 Patent in the United States because Motorola's customers use the Accused Products, including at least SmartMapping and SmartMessaging applications and/or services, alone and in conjunction with additional Accused Products and/or services, in accordance with Motorola's instructions and thereby directly infringe at least claim 10 of the '970 Patent in violation of 35 U.S.C. § 271. Motorola directly and/or indirectly intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installations and/or user

guides, such as those located at one or more of the following:

<https://www.motorolasolutions.com/content/dam/msi/Products/apx->

[next1/resources/apx_next_fact_sheet_smartmapping.pdf](https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf);

<https://www.motorolasolutions.com/content/dam/msi/Products/apx->

[next1/resources/apx_next_fact_sheet_smartmessaging.pdf](https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf);

<https://www.motorolasolutions.com/content/dam/msi/docs/global-software/commandcentral->

[aware/cc_aware_brochure_web.pdf](https://www.motorolasolutions.com/content/dam/msi/docs/global-software/commandcentral-aware/cc_aware_brochure_web.pdf);

<https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>; and Motorola's agents

and representatives located within this Judicial District. Motorola is thereby liable for infringement of the '970 Patent under 35 U.S.C. § 271(b).

30. For example, Motorola directly infringes and/or indirectly infringes by instructing its customers to infringe by performing claim 10 of the '970 Patent, including: a method of receiving, acknowledging, and responding to a forced message alert from a sender PDA/cell phone to a recipient PDA/cell phone, wherein the receipt, acknowledgment, and response to said forced message alert is forced by a forced message alert software application program, said method comprising the steps of: receiving an electronically transmitted electronic message; identifying said electronic message as a forced message alert, wherein said forced message alert comprises a voice or text message and a forced message alert application software packet, which triggers the activation of the forced message alert software application program within the recipient PDA/cell phone; transmitting an automatic acknowledgment of receipt to the sender PDA/cell phone, which triggers the forced message alert software application program to take control of the recipient PDA/cell phone and shows the content of the text message and a required response list on the display recipient PDA/cell phone or to repeat audibly the content of the voice message on the

speakers of the recipient PDA/cell phone and shows the required response list on the display recipient PDA/cell phone; and transmitting a selected required response from the response list in order to allow the message required response list to be cleared from the recipient's cell phone display, whether said selected response is a chosen option from the response list, causing the forced message alert software to release control of the recipient PDA/cell phone and stop showing the content of the text message and a response list on the display recipient PDA/cell phone and/or stop repeating the content of the voice message on the speakers of the recipient PDA/cell phone; displaying the response received from the PDA/cell phone that transmitted the response on the sender of the forced alert PDA/cell phone; and providing a list of the recipient PDA/cell phones that have automatically acknowledged receipt of a forced alert message and their response to the forced alert message; and displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone; obtaining location and status data associated with the recipient PDA/cellphone; and presenting a recipient symbol on the geographical map corresponding to a correct geographical location of the recipient PDA/cellphone based on at least the location data. For example, the Accused Products include features as shown below.

LOCATION, TRACKING & MAPPING

SIMPLIFY INFORMATION. MAKE BETTER DECISIONS.



MONITOR ACTIVITY FROM ANYWHERE

View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.



ACT WITH THE NECESSARY CONTEXT

Communicate a more informed response to a critical incident and enhance responder safety for those in the field by accessing a common operating picture through CommandCentral Aware - directly from your agency's map.




COLLABORATE WITHOUT DISTRACTION

Control specific viewing permissions based on groups of users to ensure a focused response from every team member during a critical event. Filter your view to only the datasets you need in the moment.

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ACCESS DATA FROM CAD THROUGH **COMMANDCENTRAL AWARE**, ENHANCING THE COMMON OPERATING PICTURE.



BROCHURE | COMMANDCENTRAL AWARE

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¹⁰ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

¹¹ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

FEATURES:

Unified Mapping: Utilizing a common Esri base map, geographically locate real-time events such as CAD incidents, device and unit location, alert and alarms, tactical decision data and camera locations. Incorporate other Esri-based map layers from your agency for enriched spatial orientation such as property boundaries, landmarks, buildings, and asset locations. In addition, streaming and stationary weather layers are provided to enhance visual situational awareness. Organize your devices through group management to further refine ownership to adhere to logical inter agency and intra agency configurations. Manage the content seen by these agencies via groups of users provisioned and authorized to see specific mapping layers.

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LOCATION, TRACKING, MAPPING & ALERTS

KEEP OFFICERS AND CITIZENS SAFE ON THE STREETS



RESPOND QUICKLY TO ESCALATING INCIDENTS

Responder alerts automatically show the command center what's happening to officers during an incident, whether that be an emergency, weapon drawn, vest pierce, man down alerts, and more. Alerts showing the location and type of incident on the consolidated map help dispatchers enhance situational awareness and improve officer and citizen safety.

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¹² <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

¹³ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

31. The Accused Products, such as Motorola CommandCentral Inform, SmartMapping, SmartMessaging, and Astro 25 Mission Critical Data further include similar features and functionality to CommandCentral Aware, and infringe in a substantially similar manner.¹⁴

COMMANDCENTRAL INFORM

SIMPLIFY INFORMATION. MAKE THE BEST DECISIONS.

Can your team easily see the information that matters? A single piece of information can often make the difference in directing the safest response. Yet, ensuring everyone has access to the right information and can quickly understand its relevance can be difficult. Keep everyone informed and in sync with a map-based common operating picture available anywhere they are, on any device from CommandCentral Inform.



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View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.

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Filter your view to only the datasets you need in the moment. Access critical event information such as incident reports, video, resource details, sensor statuses and more – directly from the map.

COLLABORATE WITHOUT DISTRACTION
Your common operating picture is "view-only" with specific viewing permissions based on team. This ensures everyone is on the same page, with the information that matters.

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¹⁴ See, e.g., <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

¹⁵ <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

KEY FEATURES

Unified Mapping: See events like CAD incidents and sensor alarms, alongside resource locations like personnel and cameras, visualized on an ESRI-based map that can be customized with any of your agency's other data layers. This view is shared with **CommandCentral Aware** and can even include data layers from **CommandCentral Analytics**.

Desktop & Mobile Accessibility: Work seamlessly from desktop to mobile. CommandCentral Inform is accessible via web browser on any computer as well as from any tablet or smartphone running Android or iOS.

Data Layer Filtering: Each data source can be shown or hidden based on selecting or deselecting it in the data layer panel. This ensures users are seeing only what they need in that moment. Data layers can also be prioritized to ensure certain information takes visual precedence on the map.

Critical Information Display: Information associated with each event or resource on the map can be viewed in the critical information display. This includes things like incident details from a CAD event, video attachments or status readings from a sensor.

Team-Based Permissions: Restrict what personnel see based on what they need to be most effective. This ensures that consistent and relevant information is being referenced from a true common operating picture.

"View-Only" Information Access: Ensure workflows are unhindered by access to information in the simplest form possible. CommandCentral Inform's "view-only" design guarantees users are able to digest the information they need while staying focused.

SITUATIONAL INTELLIGENCE FOR YOUR ENTIRE OPERATION

CommandCentral Inform provides the consolidated, map-based common operating picture needed to enhance decision-making at any part of your operation. Our **CommandCentral Aware** application goes a step further to help you better support a response with more robust situational intelligence by integrating that map-based common operating picture with real-time streaming video and native ASTRO® 25 console communications. CommandCentral Aware and CommandCentral Inform are built to work together seamlessly so personnel are collaborating most effectively across your operation, with actionable intelligence.

INVEST FOR TODAY AND THE FUTURE WITH COMMANDCENTRAL

By integrating your technology investments with the cloud-based CommandCentral platform, you are breaking down silos so you can utilize future and existing technologies, together. Rapidly processing your various datasets extracts real-time, actionable intelligence that is then delivered through applications designed to meet your workflow needs.

Deploying with the cloud allows you to minimize capital expenditures, reduce overhead and easily scale to your agency's needs. You are also protected with end-to-end security, enabling compliance to all major security standards including CJIS, FedRAMP and FISMA.

If you ever have any questions or issues with your product, support services are included with your purchase of CommandCentral, available to you by phone or email 24/7/365.

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BENEFITS

- **Stay On Track:** Get precise location information on a modern map interface — right on your radio.
- **Stay In Touch:** View the location of other first responders at a glance. See their status. Tap to communicate.
- **Stay Up-To-Date:** SmartMapping will evolve. Get ready for custom map integration, CAD integration, voice activation and much more.

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¹⁶ <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

¹⁷ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf



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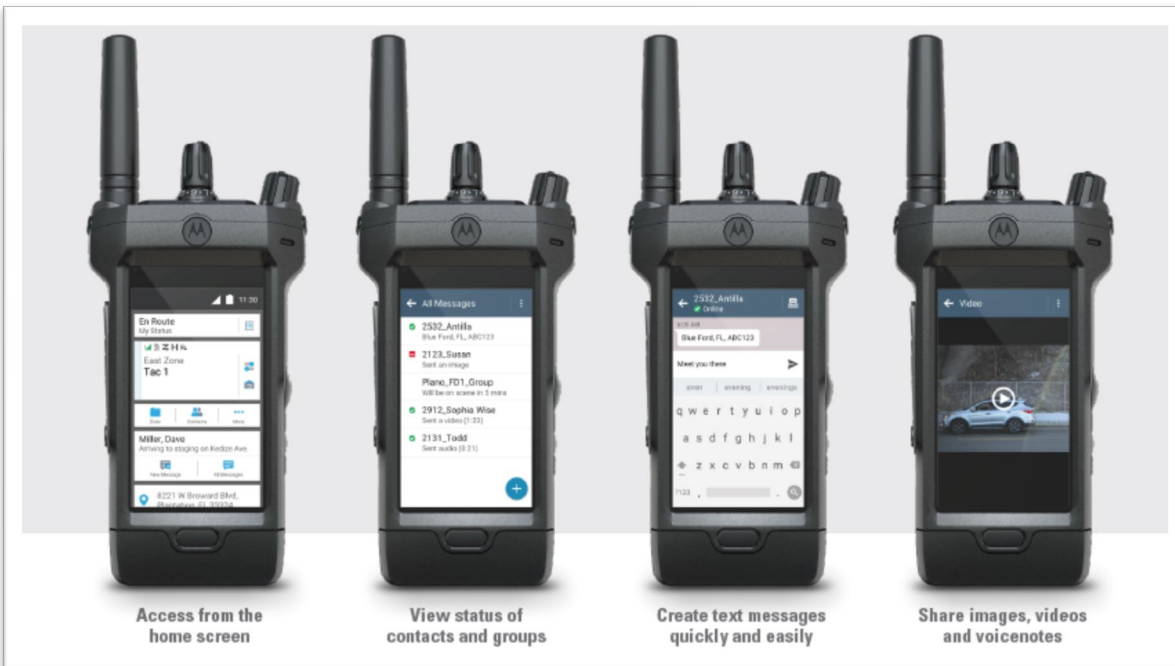
BENEFITS

- **Every Tool You Need:** Text messages, picture messages, voicenotes and videos. Share information with groups and individuals, in the way that suits you best.¹
- **Purpose-Built:** Built into the APX NEXT home screen, SmartMessaging is designed specifically for public safety communications.
- **Ready For The Future:** SmartMessaging has unlimited possibilities for future development - including multi-agency support, and ViQi integration.

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¹⁸ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf

¹⁹ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx-next_family_smartmessaging_fs0722.pdf



Access from the home screen

View status of contacts and groups


Create text messages quickly and easily

Share images, videos and voicenotes

20

INTEROPERABLE

Because ASTRO 25 is APCO P25 compliant, you get all the benefits that come from standards including voice PTT interoperability across disparate P25 systems. But ASTRO 25 goes further, allowing P25 data traffic to pass between P25 systems and sharing critical data such as location, identity, text and more with broadband users so that everyone, regardless of the device they carry, can stay informed.




21

²⁰ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx-next_family_smartmessaging_fs0722.pdf

²¹ <https://www.motorolasolutions.com/content/dam/msi/docs/astro-25/astro-25-mission-critical-data-brochure.pdf>


**ASTRO 25 DATA APPLICATIONS
AVAILABLE TODAY FROM MOTOROLA SOLUTIONS**

 **LOCATION SERVICES**

ASTRO 25 OUTDOOR GPS LOCATION
Track the location of your vehicles and personnel through either a dedicated GPS receiver or the integrated GPS in your APX radio.

LOCATION ON RECEIVE
Get location updates from an APX radio on a TDMA channel, while a radio user is receiving voice audio or in hangtime during an active call.


LOCATION ON PTT
Get location updates from your radios every time they push the PTT button without adding any additional traffic load on either the data or voice channels – even receive updates during emergency calls.

 **FLEET MANAGEMENT**

OVER THE AIR SOFTWARE UPDATE
Update your entire fleet of radios in less than a week with no service disruption.

PROGRAMMING OVER P25 (POP25)
Reprogram radios over the air, eliminating the need to bring the radios into a service shop, saving time and money.


ASTRO 25 OVER THE AIR REKEYING (OTAR)
Quickly change and manage the distribution of encryption keys over the air, increasing security and simplifying logistics of key management.

 **MESSAGING AND ALERTING**

ASTRO 25 ADVANCED MESSAGING SOLUTIONS
Send and receive pre-programmed or free-form text messages to individuals or groups directly from two-way radios.

TALKGROUP TEXT MESSAGING
Broadcast detailed information via text to everyone in a talkgroup simultaneously.

MACH ALERT FIRE STATION AUTOMATION AND ALERTING
Alert multiple fire stations simultaneously and control elements in the firehouse such as closing doors and turning off stoves to improve response time, efficiency and safety.

 **MONITORING AND CONTROL**

APX PERSONNEL ACCOUNTABILITY
Streamline on-scene roll calls, alert your team to changing incident situation and improve personnel safety.

SCADA & INDUSTRIAL IOT
From site security to fluid flows and electric grids, monitor and control remote sites and equipment with a variety of applications tailored to industry specific needs.

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32. AGIS Software has suffered damages as a result of Defendant’s direct and indirect infringement of the ’970 Patent in an amount to be proved at trial.

33. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of Defendant’s infringement of the ’970 Patent for which there is no adequate remedy at law, unless Defendant’s infringement is enjoined by this Court.

²² <https://www.motorolasolutions.com/content/dam/msi/docs/astro-25/astro-25-mission-critical-data-brochure.pdf>

COUNT II
(Infringement of the '251 Patent)

34. Paragraphs 1 through 23 are incorporated herein by reference as if fully set forth in their entireties.

35. AGIS Software has not licensed or otherwise authorized Defendant to make, use, offer for sale, sell, distribute, export from, or import any Accused Products and/or products that embody the inventions of the '251 Patent.

36. Defendant infringes, contributes to the infringement of, and/or induces infringement of the '251 Patent by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States products and/or methods covered by one or more claims of the '251 Patent including, but not limited to, the Accused Products.

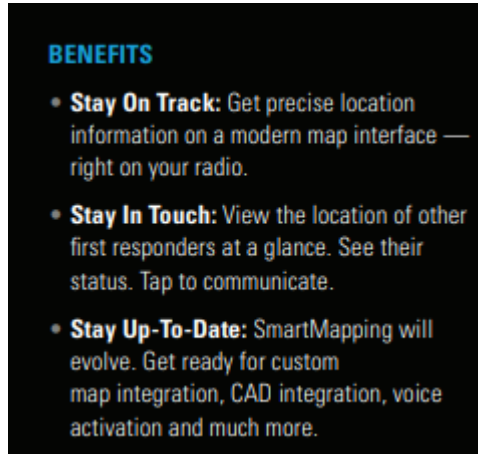
37. Defendant has and continues to directly infringe at least claim 24 of the '251 Patent, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products without authority and in violation of 35 U.S.C. § 271(a).

38. Defendant has and continues to indirectly infringe at least claim 24 of the '251 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products and by instructing users of the Accused Products to perform methods claimed in the '251 Patent. For example, Defendant, with knowledge that the Accused Products infringe the '251 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce direct infringement of the '251 Patent. Alternatively,

Defendant believed there was a high probability that others would infringe the '251 Patent but remained willfully blind to the infringing nature of others' actions.

39. For example, Defendant has indirectly infringed and continues to indirectly infringe at least claim 24 of the '251 Patent in the United States because Defendant's customers use the Accused Products, including at least SmartMapping and SmartMessaging applications and/or services or CommandCentral Aware applications and/or services, alone or in conjunction with additional Accused Products, in accordance with Defendant's instructions and thereby directly infringe at least claim 24 of the '251 Patent in violation of 35 U.S.C. § 271. Defendant directly and/or indirectly intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installations and/or user guides, such as those located at one or more of the following: https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf; https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf; https://www.motorolasolutions.com/content/dam/msi/docs/global-software/commandcentral-aware/cc_aware_brochure_web.pdf; <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>; and Defendant's agents and representatives located within this Judicial District. Defendant is thereby liable for infringement of the '251 Patent under 35 U.S.C. § 271(b). Alternatively, Defendant believed there was a high probability that others would infringe the '251 Patent but remained willfully blind to the infringing nature of others' actions.

40. For example, Defendant's Accused Products allow users to share their locations and view other users' locations on a map and to communicate with those users via the SmartMapping and SmartMessaging applications and/or CommandCentral Aware applications.



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²³ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf



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²⁴ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf



DISTRIBUTE IMAGES

A description of the suspect is useful, but a picture is so much better. Simply upload a mugshot to the WAVE Dispatch Application, then share it with individuals or groups of responders over SmartMessaging. The image will be transferred quickly over broadband, then can be viewed and re-shared, right from the radio screen.

SHARE CALL AND ADDRESS INFORMATION

What was that address? What was the patient's name again? When you're responding to an incident, and away from your MDT, it's not easy to remember all the details - and scribbling a note is definitely not good security practice. But a SmartMessaging text is persistent. You can come back to your message history, to get confirmation of the incident details.

PUBLISH DAILY NOTICES

Command staff need to be able to send out bulletins: important information like daily road closures and public events. But these nonurgent messages needn't clog up the radio system, when you can send them as voicenotes. Responders aren't distracted mid-incident: they can listen whenever it's safe and convenient to do so.

25

²⁵ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf



26

LOCATION, TRACKING & MAPPING

SIMPLIFY INFORMATION. MAKE BETTER DECISIONS.



MONITOR ACTIVITY FROM ANYWHERE

View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.



ACT WITH THE NECESSARY CONTEXT

Communicate a more informed response to a critical incident and enhance responder safety for those in the field by accessing a common operating picture through CommandCentral Aware - directly from your agency's map.



COLLABORATE WITHOUT DISTRACTION


Control specific viewing permissions based on groups of users to ensure a focused response from every team member during a critical event. Filter your view to only the datasets you need in the moment.

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²⁶ <https://video.motorolasolutions.com/detail/video/6195161012001>

²⁷ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

**ACCESS DATA FROM
CAD THROUGH
COMMANDCENTRAL AWARE,
ENHANCING THE COMMON
OPERATING PICTURE.**



BROCHURE | COMMANDCENTRAL AWARE

28

FEATURES:

Unified Mapping: Utilizing a common Esri base map, geographically locate real-time events such as CAD incidents, device and unit location, alert and alarms, tactical decision data and camera locations. Incorporate other Esri-based map layers from your agency for enriched spatial orientation such as property boundaries, landmarks, buildings, and asset locations. In addition, streaming and stationary weather layers are provided to enhance visual situational awareness. Organize your devices through group management to further refine ownership to adhere to logical inter agency and intra agency configurations. Manage the content seen by these agencies via groups of users provisioned and authorized to see specific mapping layers.

29

²⁸ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

²⁹ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

**LOCATION, TRACKING,
MAPPING & ALERTS**
KEEP OFFICERS AND CITIZENS SAFE ON THE STREETS





RESPOND QUICKLY TO ESCALATING INCIDENTS

Responder alerts automatically show the command center what's happening to officers during an incident, whether that be an emergency, weapon drawn, vest pierce, man down alerts, and more. Alerts showing the location and type of incident on the consolidated map help dispatchers enhance situational awareness and improve officer and citizen safety.

30

41. For example, the exemplary Accused Products allow users to establish groups and to exchange messages via interaction with servers which provide the SmartMapping services, among other relevant services. The exemplary Accused Products further allow users to retrieve map information from multiple sources, including street-view maps.

³⁰ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

DETAILS

When a call quickly unfolds, keeping track of the big picture can give you the edge you need to be more effective in incident organization or team member safety.

That's where SmartMapping can help. It's everything you expect from a mapping tool - and much more. Of course you can see your location or find an address. But you can also enhance your effectiveness with other information overlays. Switch between street map, terrain, and satellite views for details of your surroundings. See the position of other personnel or vehicles arriving on scene - even locate a first responder in distress. When you need to contact a first responder, simply locate their icon on the map and then just tap to send an alert or voice call.

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Always in the picture

Your first responders can't lose track of the big picture: their safety depends on it. But in the heat of an incident, they can get disoriented and lose sight of the team. That's where SmartMapping can help.



✓ **Increase awareness**

Allow your first responders to see the big picture, with a clear location map of the situation, right on their radios.

✓ **Enhance teamwork**

Empower your teams to communicate and coordinate better, even in the chaos of an emergency situation

✓ **Improve security**

Upgrade from consumer-grade mapping. Invest in a mission-critical application, integrated into your public safety radio system.

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³¹ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf

³² https://www.motorolasolutions.com/en_us/products/p25-products/apx-mission-critical-applications/smartmapping.html

LOCATION, TRACKING, MAPPING & ALERTS

KEEP OFFICERS AND CITIZENS SAFE ON THE STREETS

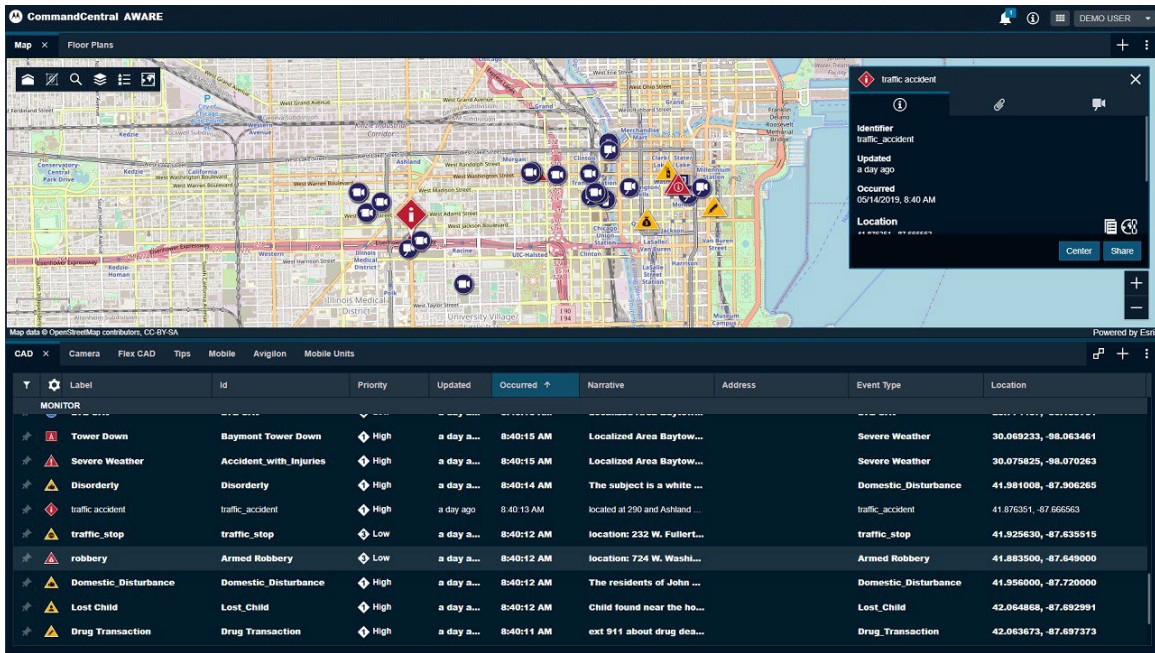




RESPOND QUICKLY TO ESCALATING INCIDENTS

Responder alerts automatically show the command center what's happening to officers during an incident, whether that be an emergency, weapon drawn, vest pierce, man down alerts, and more. Alerts showing the location and type of incident on the consolidated map help dispatchers enhance situational awareness and improve officer and citizen safety.

33



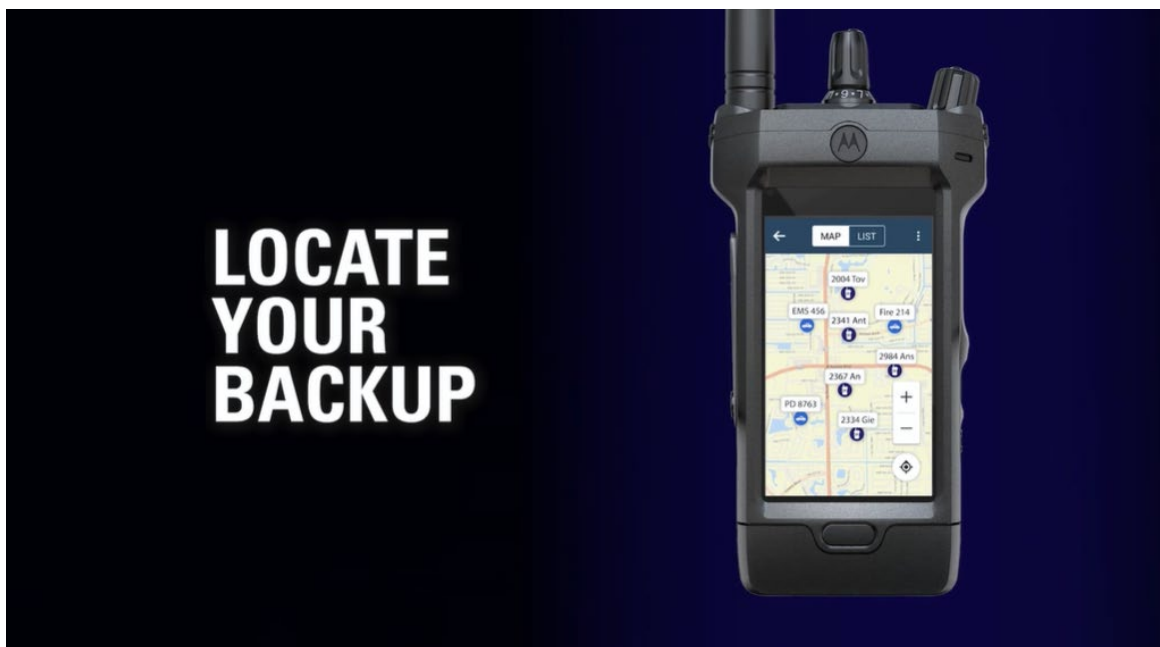
	Label	Id	Priority	Updated	Occurred	Narrative	Address	Event Type	Location
MONITOR									
⚠️	Tower Down	Baymont Tower Down	High	a day a...	8:40:15 AM	Localized Area Baytow...		Severe Weather	30.069233, -98.063461
⚠️	Severe Weather	Accident_with_Injuries	High	a day a...	8:40:15 AM	Localized Area Baytow...		Severe Weather	30.075825, -98.070263
⚠️	Disorderly	Disorderly	High	a day a...	8:40:14 AM	The subject is a white ...		Domestic_Disturbance	41.981008, -87.906265
⚠️	traffic accident	traffic_accident	High	a day ago	8:40:13 AM	located at 290 and Ashland ...		traffic_accident	41.076351, -87.666563
⚠️	traffic_stop	traffic_stop	Low	a day a...	8:40:12 AM	location: 232 W. Fullert...		traffic_stop	41.925630, -87.635515
⚠️	robbery	Armed Robbery	Low	a day a...	8:40:12 AM	location: 724 W. Washi...		Armed Robbery	41.883500, -87.649000
⚠️	Domestic_Disturbance	Domestic_Disturbance	High	a day a...	8:40:12 AM	The residents of John ...		Domestic_Disturbance	41.956000, -87.720000
⚠️	Lost Child	Lost_Child	High	a day a...	8:40:12 AM	Child found near the ho...		Lost_Child	42.064868, -87.692991
⚠️	Drug Transaction	Drug Transaction	High	a day a...	8:40:11 AM	ext 911 about drug dea...		Drug_Transaction	42.063673, -87.697373

34

42. The exemplary Accused Products are programmed to receive messages from other devices where those messages relate to joining groups, as depicted below:

³³ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

³⁴ <https://azuremarketplace.microsoft.com/en-us/marketplace/apps/motorolasolutionsinc.commandcentral-aware?tab=overview>



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³⁵ <https://video.motorolasolutions.com/detail/video/6195161012001>

³⁶ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1aDY9>



DISTRIBUTE IMAGES

A description of the suspect is useful, but a picture is so much better. Simply upload a mugshot to the WAVE Dispatch Application, then share it with individuals or groups of responders over SmartMessaging. The image will be transferred quickly over broadband, then can be viewed and re-shared, right from the radio screen.

SHARE CALL AND ADDRESS INFORMATION

What was that address? What was the patient's name again? When you're responding to an incident, and away from your MDT, it's not easy to remember all the details - and scribbling a note is definitely not good security practice. But a SmartMessaging text is persistent. You can come back to your message history, to get confirmation of the incident details.

PUBLISH DAILY NOTICES

Command staff need to be able to send out bulletins: important information like daily road closures and public events. But these nonurgent messages needn't clog up the radio system, when you can send them as voicenotes. Responders aren't distracted mid-incident: they can listen whenever it's safe and convenient to do so.

³⁷ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf

Share intel in an instant

Disparate systems limit your team's ability to collaborate and communicate data across the entire workflow.

With CommandCentral Aware, share location-based information across the entire agency workflow, communicate vital intel to the field and easily export data to evidence. You can even share customized map layers with the team for improved efficiency and collaboration.

45% reduction in crime by City of Springfield, MA after implementing CommandCentral Aware

Native Radio Communications
Interface directly to our MCC7500e radio console for communication control access to interact with talkgroups and monitor device statuses.

Collaboration & Drawing Tools
Draw polygons, polylines and points on the map with coloring, icons and annotations. Drawings are visible by all users as a map layer to improve coordination.

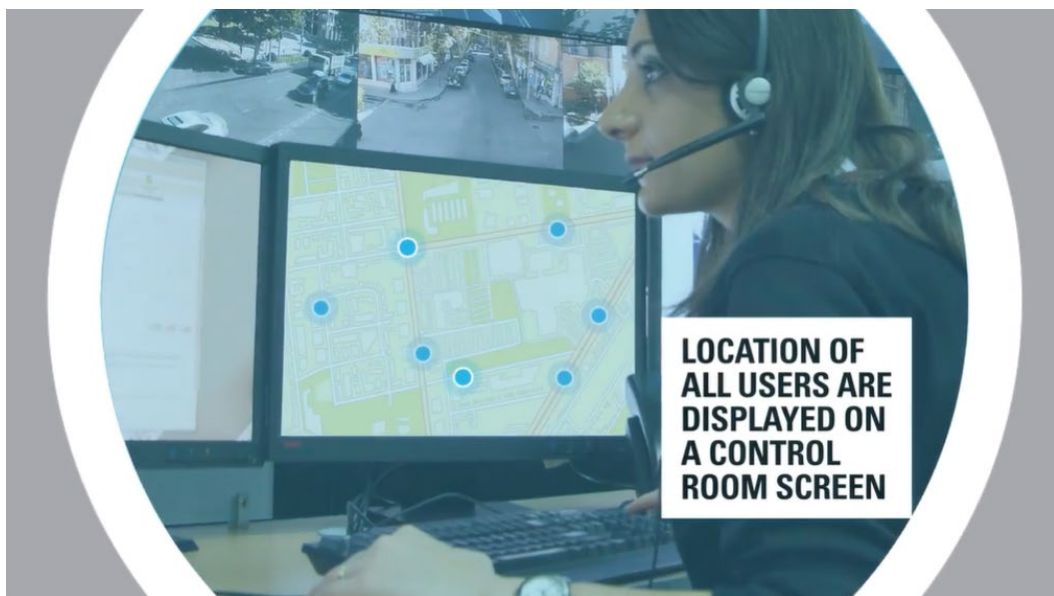
CommandCentral Evidence Export
Send video clips and snapshots with time, date, camera location and user metadata, directly to CommandCentral Evidence. Add an incident ID to improve organization.

Embedded Email Communications
Share richer situational intelligence including video clips, snapshots and more comprehensive incident updates via email sent from within CommandCentral Aware.

38

43. The exemplary Accused Products are further programmed to facilitate participation in the group by communicating with a server and sending to and receiving location information, as depicted below:

³⁸ https://www.motorolasolutions.com/content/dam/msi/docs/global-software/commandcentral-aware/cc_aware_brochure_web.pdf



39



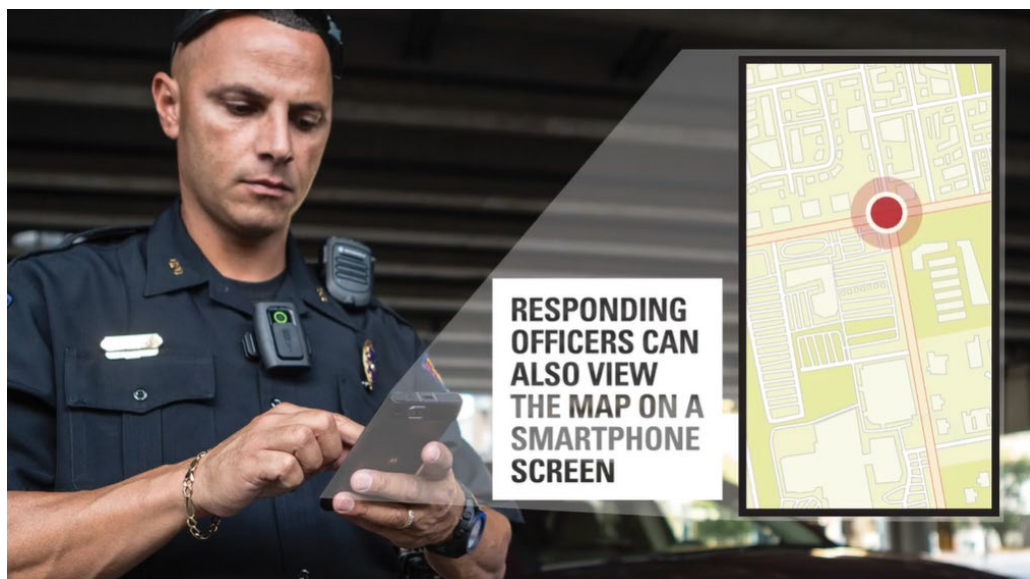
40

³⁹ <https://video.motorolasolutions.com/detail/video/5041613245001>

⁴⁰ <https://video.motorolasolutions.com/detail/video/5041613245001>



41



42

⁴¹ <https://video.motorolasolutions.com/detail/video/5041613245001>

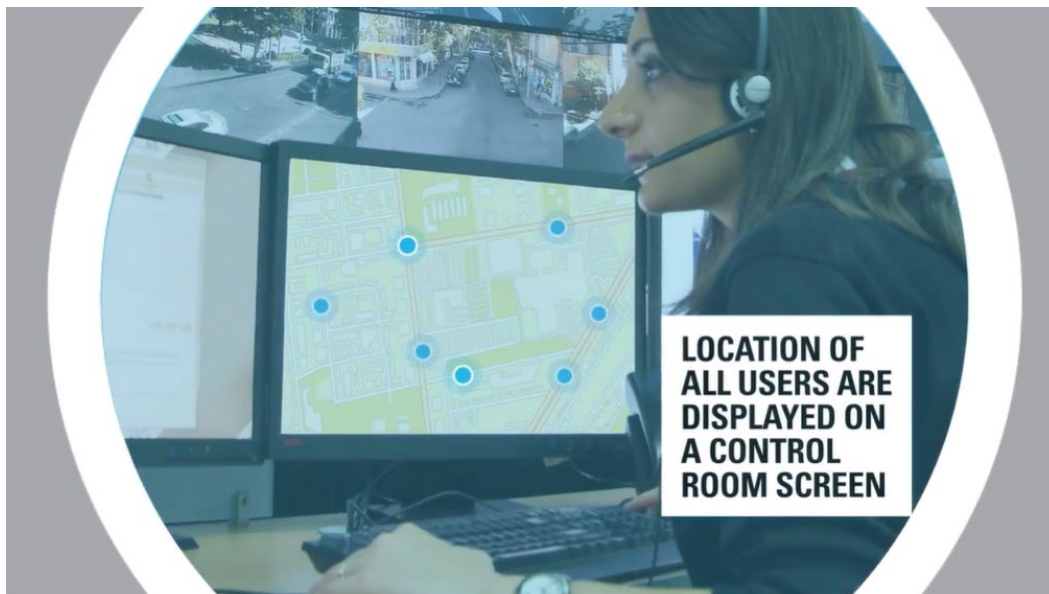
⁴² <https://video.motorolasolutions.com/detail/video/5041613245001>



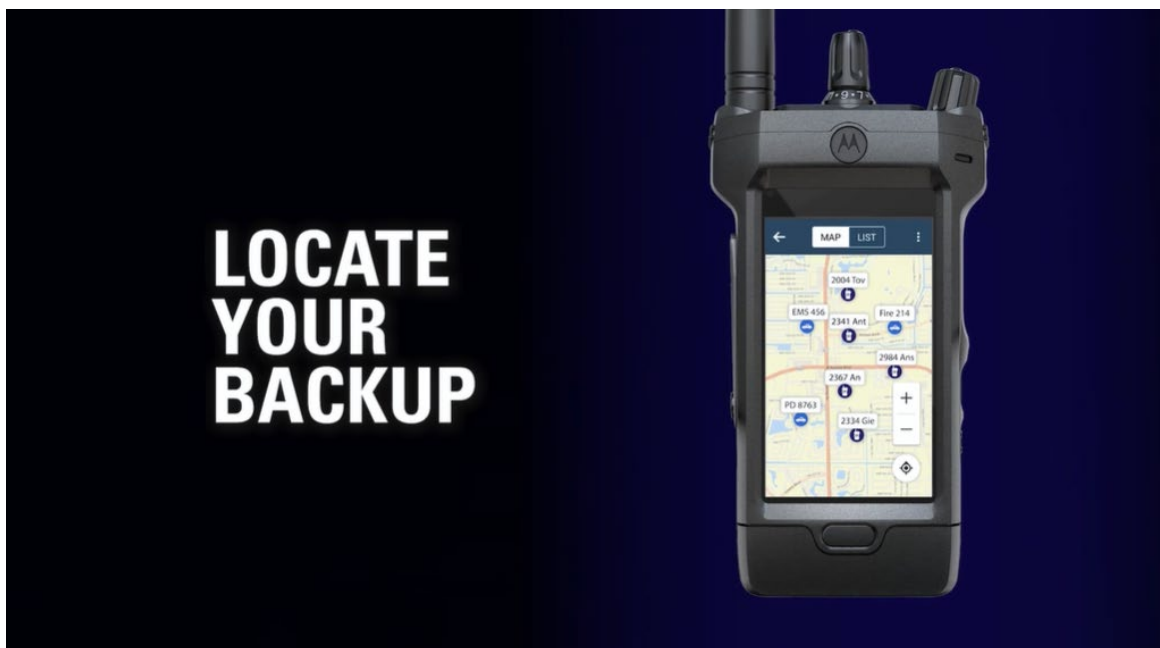
43

44. This location information is presented on interactive displays on the exemplary Accused Products which include interactive maps and a plurality of user selectable symbols corresponding to other devices. These symbols are positioned on the map at positions corresponding to the locations of the other devices, as depicted below:

⁴³ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>



44



45

⁴⁴ <https://video.motorolasolutions.com/detail/video/5041613245001>

⁴⁵ <https://video.motorolasolutions.com/detail/video/6195161012001>



46

CommandCentral AWARE

Map x Floor Plans

Label	Id	Priority	Updated	Occurred	Narrative	Address	Event Type	Location
Tower Down	Baymont Tower Down	High	a day a...	8:40:15 AM	Localized Area Baytow...		Severe Weather	30.069233, -98.063461
Severe Weather	Accident_with_Injuries	High	a day a...	8:40:15 AM	Localized Area Baytow...		Severe Weather	30.075825, -98.070283
Disorderly	Disorderly	High	a day a...	8:40:14 AM	The subject is a white ...		Domestic_Disturbance	41.981008, -87.906265
traffic accident	traffic_accident	High	a day ago	8:40:13 AM	located at 290 and Ashland ...		traffic_accident	41.076351, -87.665583
traffic_stop	traffic_stop	Low	a day a...	8:40:12 AM	location: 232 W. Fullert...		traffic_stop	41.925630, -87.635515
robbery	Armed Robbery	Low	a day a...	8:40:12 AM	location: 724 W. Washl...		Armed Robbery	41.883500, -87.649000
Domestic_Disturbance	Domestic_Disturbance	High	a day a...	8:40:12 AM	The residents of John ...		Domestic_Disturbance	41.986000, -87.720000
Lost Child	Lost Child	High	a day a...	8:40:12 AM	Child found near the ho...		Lost Child	42.064868, -87.692991
Drug Transaction	Drug Transaction	High	a day a...	8:40:11 AM	ext 911 about drug dea...		Drug Transaction	42.063673, -87.697373

Map data © OpenStreetMap contributors, CC-BY-SA

Powered by Esri

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⁴⁶ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1aDY9>

⁴⁷ <https://azuremarketplace.microsoft.com/en-us/marketplace/apps/motorolasolutionsinc.commandcentral-aware?tab=overview>

45. The exemplary Accused Products are programmed to permit users to request and display additional maps by, for example, moving the map screen and/or by selecting satellite image maps. The exemplary Accused Products are further programmed to permit interaction with the display where a user may select one or more symbols and where the exemplary Accused Products further permit data to be sent to other devices based on that interaction.



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⁴⁸ <https://video.motorolasolutions.com/detail/video/6195161012001>



49

⁴⁹ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1aDY9>



DISTRIBUTE IMAGES

A description of the suspect is useful, but a picture is so much better. Simply upload a mugshot to the WAVE Dispatch Application, then share it with individuals or groups of responders over SmartMessaging. The image will be transferred quickly over broadband, then can be viewed and re-shared, right from the radio screen.

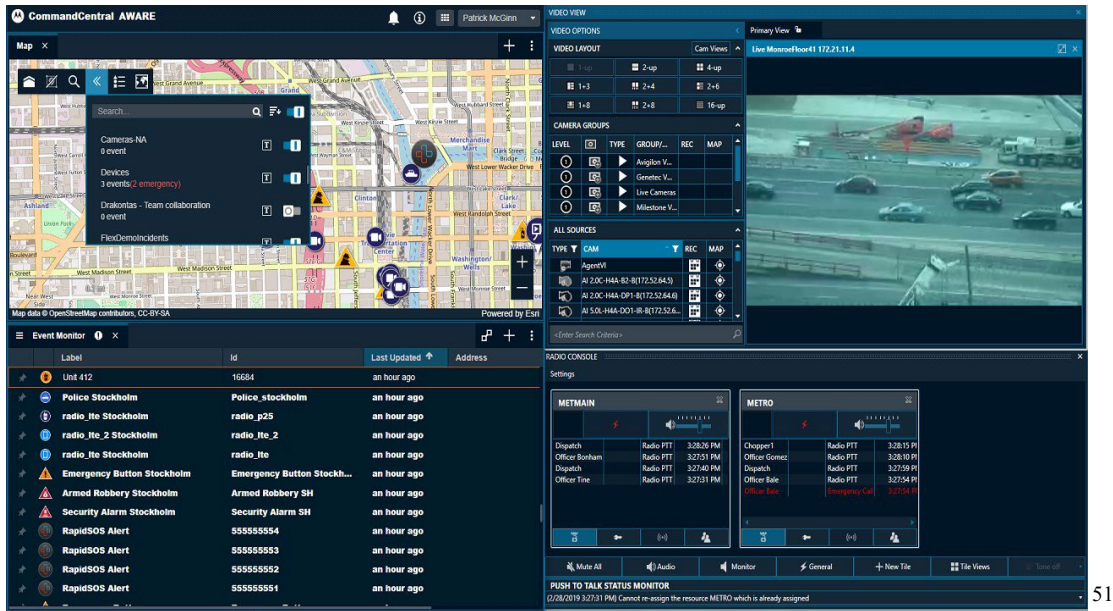
SHARE CALL AND ADDRESS INFORMATION

What was that address? What was the patient's name again? When you're responding to an incident, and away from your MDT, it's not easy to remember all the details - and scribbling a note is definitely not good security practice. But a SmartMessaging text is persistent. You can come back to your message history, to get confirmation of the incident details.

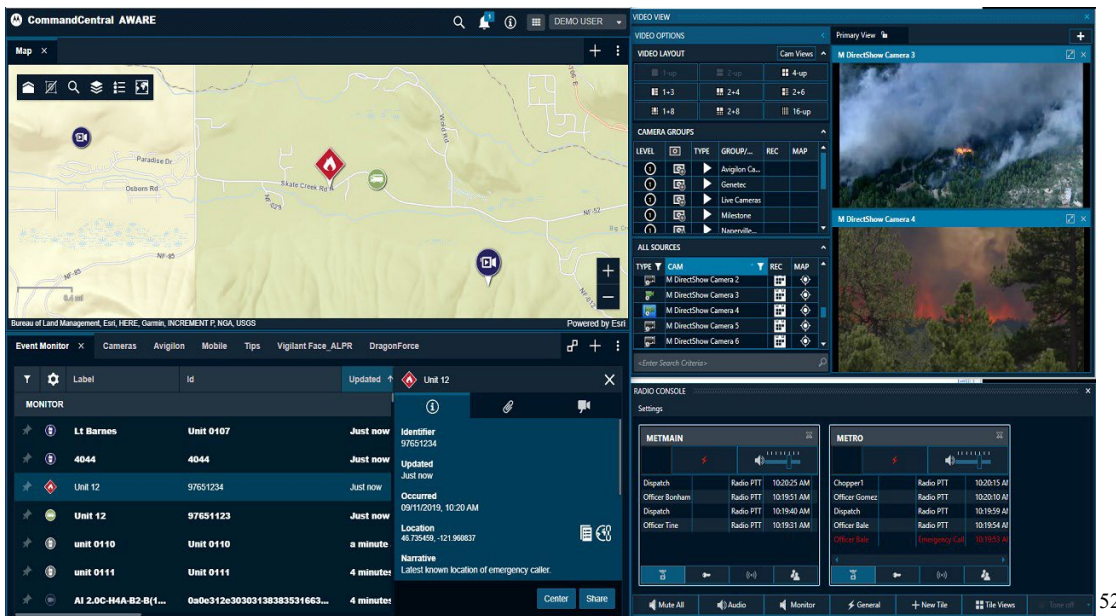
PUBLISH DAILY NOTICES

Command staff need to be able to send out bulletins: important information like daily road closures and public events. But these nonurgent messages needn't clog up the radio system, when you can send them as voicenotes. Responders aren't distracted mid-incident: they can listen whenever it's safe and convenient to do so.

⁵⁰ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf



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46. The Accused Products, such as Motorola CommandCentral Inform, SmartMapping, SmartMessaging, and Astro 25 Mission Critical Data further include similar

⁵¹ <https://azuremarketplace.microsoft.com/en-us/marketplace/apps/motorolasolutionsinc.commandcentral-aware?tab=overview>

⁵² <https://azuremarketplace.microsoft.com/en-us/marketplace/apps/motorolasolutionsinc.commandcentral-aware?tab=overview>

features and functionality to CommandCentral Aware, and infringe in a substantially similar manner.⁵³

COMMANDCENTRAL INFORM

SIMPLIFY INFORMATION. MAKE THE BEST DECISIONS.

Can your team easily see the information that matters? A single piece of information can often make the difference in directing the safest response. Yet, ensuring everyone has access to the right information and can quickly understand its relevance can be difficult. Keep everyone informed and in sync with a map-based common operating picture available anywhere they are, on any device from CommandCentral Inform.



REQUEST A DEMO:
Register Online at motorolasolutions.com/spssdemo

MONITOR ACTIVITY FROM ANYWHERE
View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.

ACT WITH THE NECESSARY CONTEXT
Filter your view to only the datasets you need in the moment. Access critical event information such as incident reports, video, resource details, sensor statuses and more – directly from the map.

COLLABORATE WITHOUT DISTRACTION
Your common operating picture is "view-only" with specific viewing permissions based on team. This ensures everyone is on the same page, with the information that matters.

54

⁵³ See, e.g., <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

⁵⁴ <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

KEY FEATURES

Unified Mapping: See events like CAD incidents and sensor alarms, alongside resource locations like personnel and cameras, visualized on an ESRI-based map that can be customized with any of your agency's other data layers. This view is shared with **CommandCentral Aware** and can even include data layers from **CommandCentral Analytics**.

Desktop & Mobile Accessibility: Work seamlessly from desktop to mobile. CommandCentral Inform is accessible via web browser on any computer as well as from any tablet or smartphone running Android or iOS.

Data Layer Filtering: Each data source can be shown or hidden based on selecting or deselecting it in the data layer panel. This ensures users are seeing only what they need in that moment. Data layers can also be prioritized to ensure certain information takes visual precedence on the map.

Critical Information Display: Information associated with each event or resource on the map can be viewed in the critical information display. This includes things like incident details from a CAD event, video attachments or status readings from a sensor.

Team-Based Permissions: Restrict what personnel see based on what they need to be most effective. This ensures that consistent and relevant information is being referenced from a true common operating picture.

"View-Only" Information Access: Ensure workflows are unhindered by access to information in the simplest form possible. CommandCentral Inform's "view-only" design guarantees users are able to digest the information they need while staying focused.

SITUATIONAL INTELLIGENCE FOR YOUR ENTIRE OPERATION

CommandCentral Inform provides the consolidated, map-based common operating picture needed to enhance decision-making at any part of your operation. Our **CommandCentral Aware** application goes a step further to help you better support a response with more robust situational intelligence by integrating that map-based common operating picture with real-time streaming video and native ASTRO® 25 console communications. CommandCentral Aware and CommandCentral Inform are built to work together seamlessly so personnel are collaborating most effectively across your operation, with actionable intelligence.

INVEST FOR TODAY AND THE FUTURE WITH COMMANDCENTRAL

By integrating your technology investments with the cloud-based CommandCentral platform, you are breaking down silos so you can utilize future and existing technologies, together. Rapidly processing your various datasets extracts real-time, actionable intelligence that is then delivered through applications designed to meet your workflow needs.

Deploying with the cloud allows you to minimize capital expenditures, reduce overhead and easily scale to your agency's needs. You are also protected with end-to-end security, enabling compliance to all major security standards including CJIS, FedRAMP and FISMA.

If you ever have any questions or issues with your product, support services are included with your purchase of CommandCentral, available to you by phone or email 24/7/365.

55

BENEFITS

- **Stay On Track:** Get precise location information on a modern map interface — right on your radio.
- **Stay In Touch:** View the location of other first responders at a glance. See their status. Tap to communicate.
- **Stay Up-To-Date:** SmartMapping will evolve. Get ready for custom map integration, CAD integration, voice activation and much more.

56

⁵⁵ <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

⁵⁶ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf



57

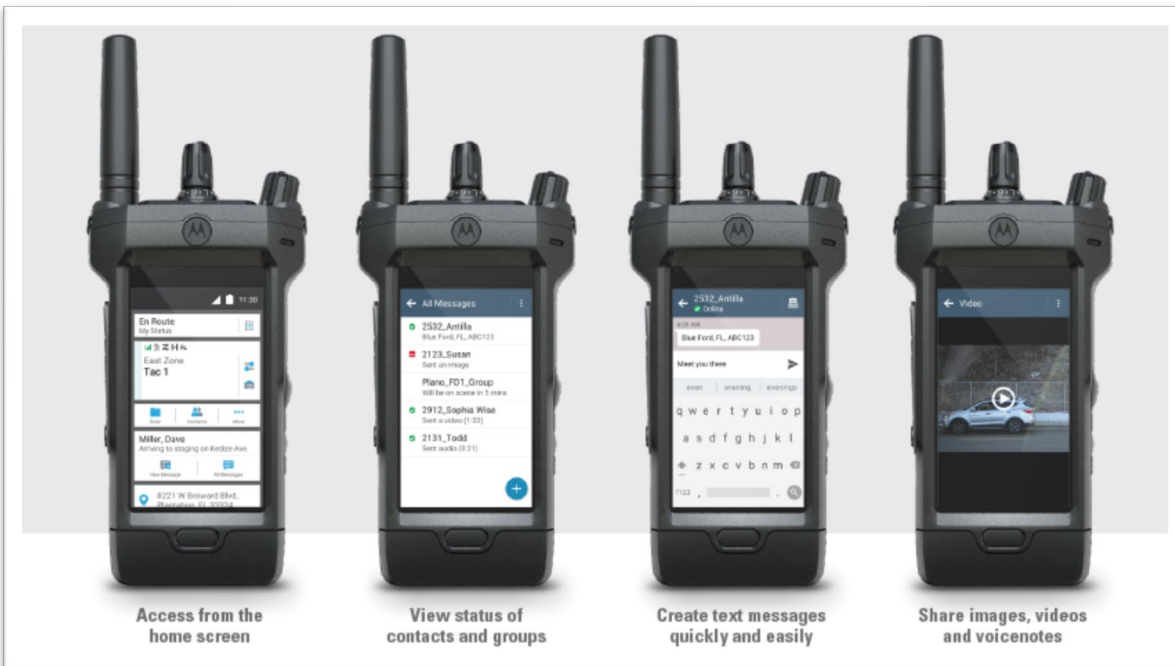
BENEFITS

- **Every Tool You Need:** Text messages, picture messages, voicenotes and videos. Share information with groups and individuals, in the way that suits you best.¹
- **Purpose-Built:** Built into the APX NEXT home screen, SmartMessaging is designed specifically for public safety communications.
- **Ready For The Future:** SmartMessaging has unlimited possibilities for future development - including multi-agency support, and ViQi integration.

58

⁵⁷ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf

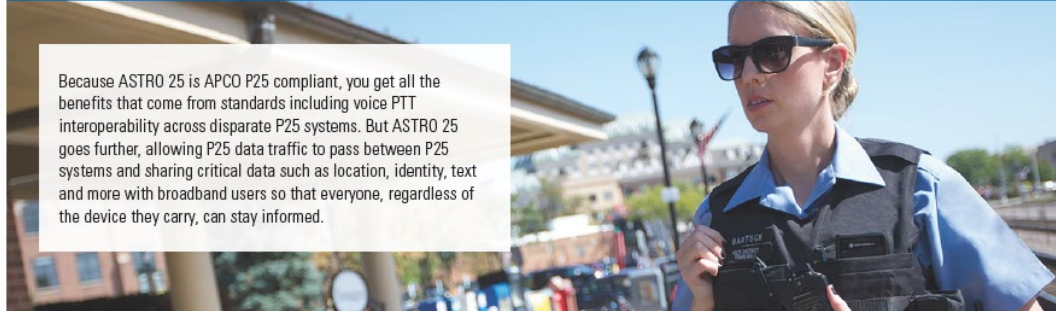
⁵⁸ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx-next_family_smartmessaging_fs0722.pdf



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INTEROPERABLE

Because ASTRO 25 is APCO P25 compliant, you get all the benefits that come from standards including voice PTT interoperability across disparate P25 systems. But ASTRO 25 goes further, allowing P25 data traffic to pass between P25 systems and sharing critical data such as location, identity, text and more with broadband users so that everyone, regardless of the device they carry, can stay informed.



60

⁵⁹ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx-next_family_smartmessaging_fs0722.pdf

⁶⁰ <https://www.motorolasolutions.com/content/dam/msi/docs/astro-25/astro-25-mission-critical-data-brochure.pdf>

**ASTRO 25 DATA APPLICATIONS
AVAILABLE TODAY FROM MOTOROLA SOLUTIONS**

 **LOCATION SERVICES**

ASTRO 25 OUTDOOR GPS LOCATION
Track the location of your vehicles and personnel through either a dedicated GPS receiver or the integrated GPS in your APX radio.

LOCATION ON RECEIVE
Get location updates from an APX radio on a TDMA channel, while a radio user is receiving voice audio or in hangtime during an active call.

LOCATION ON PTT
Get location updates from your radios every time they push the PTT button without adding any additional traffic load on either the data or voice channels – even receive updates during emergency calls.

 **FLEET MANAGEMENT**

OVER THE AIR SOFTWARE UPDATE
Update your entire fleet of radios in less than a week with no service disruption.

PROGRAMMING OVER P25 (POP25)
Reprogram radios over the air, eliminating the need to bring the radios into a service shop, saving time and money.

ASTRO 25 OVER THE AIR REKEYING (OTAR)
Quickly change and manage the distribution of encryption keys over the air, increasing security and simplifying logistics of key management.

 **MESSAGING AND ALERTING**

ASTRO 25 ADVANCED MESSAGING SOLUTIONS
Send and receive pre-programmed or free-form text messages to individuals or groups directly from two-way radios.

TALKGROUP TEXT MESSAGING
Broadcast detailed information via text to everyone in a talkgroup simultaneously.

MACH ALERT FIRE STATION AUTOMATION AND ALERTING
Alert multiple fire stations simultaneously and control elements in the firehouse such as closing doors and turning off stoves to improve response time, efficiency and safety.

 **MONITORING AND CONTROL**

APX PERSONNEL ACCOUNTABILITY
Streamline on-scene roll calls, alert your team to changing incident situation and improve personnel safety.

SCADA & INDUSTRIAL IOT
From site security to fluid flows and electric grids, monitor and control remote sites and equipment with a variety of applications tailored to industry specific needs.

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47. AGIS Software has suffered damages as a result of Defendant’s direct and indirect infringement of the ’251 Patent in an amount to be proved at trial.

48. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of Defendant’s infringement of the ’251 Patent for which there is no adequate remedy at law unless Defendant’s infringement is enjoined by this Court.

⁶¹ <https://www.motorolasolutions.com/content/dam/msi/docs/astro-25/astro-25-mission-critical-data-brochure.pdf>

COUNT III
(Infringement of the '123 Patent)

49. Paragraphs 1 through 23 are incorporated herein by reference as if fully set forth in their entireties.

50. AGIS Software has not licensed or otherwise authorized Defendant to make, use, offer for sale, sell, distribute, export from, or import any products that embody the inventions of the '123 Patent.

51. Defendant has and continues to directly infringe at least claim 23 of the '123 Patent, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products without authority and in violation of 35 U.S.C. § 271(a).

52. Defendant has and continues to indirectly infringe at least claim 23 of the '123 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the infringing Accused Products and by instructing users of the Accused Products to perform at least the method of claim 23 in the '123 Patent. For example, Defendant, with knowledge that the Accused Products infringe the '123 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce direct infringement of at least claim 23 of the '123 Patent in violation of 35 U.S.C. § 271(b). Alternatively, Defendant believed there was a high probability that others would infringe the '123 Patent but remained willfully blind to the infringing nature of others' actions.

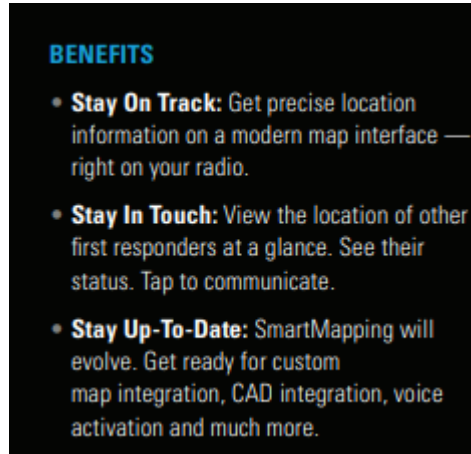
53. For example, Defendant has indirectly infringed and continues to indirectly infringe at least claim 23 of the '123 Patent in the United States because Defendant's customers use the

Accused Products, including at least the SmartMapping and SmartMessaging applications and/or services or CommandCentral Aware applications and/or services, alone or in conjunction with additional Accused Products, in accordance with Defendant's instructions and thereby directly infringe at least one claim of the '123 Patent in violation of 35 U.S.C. § 271. Defendant directly and/or indirectly intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installations and/or user guides, such as those located at one or more of the following: https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf;
https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf;
https://www.motorolasolutions.com/content/dam/msi/docs/global-software/commandcentral-aware/cc_aware_brochure_web.pdf;
<https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>; and Defendant's agents and representatives located within this Judicial District. Defendant is thereby liable for infringement of the '123 Patent under 35 U.S.C. § 271(b).

54. Alternatively, Defendant believed there was a high probability that others would infringe the '123 Patent but remained willfully blind to the infringing nature of others' actions. For example, Defendant directly infringes and/or indirectly infringes by instructing its customers to infringe by a system comprising: a first device programmed to perform operations comprising: receiving a message sent by a second device, wherein the message relates to joining a group; based on receipt of the message sent by the second device, sending first location information to a first server and receiving second location information from the first server, the first location information comprising a location of the first device, the second location information comprising

one or more locations of one or more respective second devices included in the group; sending, from the first device to a second server, a request for georeferenced map data; receiving, from the second server, the georeferenced map data; presenting, via an interactive display of the first device, a georeferenced map and one or more user-selectable symbols corresponding to one or more of the second devices, wherein the symbols are positioned on the georeferenced map at respective positions corresponding to the locations of the second devices represented by the symbols, and wherein the georeferenced map data relate positions on the georeferenced map to spatial coordinates; and identifying user interaction with the interactive display selecting a particular user-selectable symbol corresponding to a particular second device and user interaction with the display specifying an action and, based thereon, using an Internet Protocol to send data to the particular second device, wherein identifying the user interaction selecting the particular user-selectable symbol comprises: detecting user selection of a portion of the interactive display corresponding to a position on the georeferenced map, and identifying the particular user-selectable symbol based, at least in part, on coordinates of the selected position, comprising: searching a set of symbols for a symbol located nearest to the coordinates of the selected position, wherein the set of symbols includes the user-selectable symbols corresponding to the second devices in the group, and wherein data associated with the set of symbols include coordinates of portions of the display corresponding to the symbols in the set, and based on a result of searching the set of symbols, identifying the particular user-selectable symbol as the symbol located nearest to the coordinates of the selected position, wherein the particular user-selectable symbol corresponds to the particular second device. For example, the Accused Products include features, as shown below.

55. For example, Defendant's Accused Products allow users to share their locations and view other users' locations on a map and to communicate with those users via the SmartMapping and SmartMessaging applications and/or CommandCentral Aware applications.



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⁶² https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf



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⁶³ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf



DISTRIBUTE IMAGES

A description of the suspect is useful, but a picture is so much better. Simply upload a mugshot to the WAVE Dispatch Application, then share it with individuals or groups of responders over SmartMessaging. The image will be transferred quickly over broadband, then can be viewed and re-shared, right from the radio screen.

SHARE CALL AND ADDRESS INFORMATION

What was that address? What was the patient's name again? When you're responding to an incident, and away from your MDT, it's not easy to remember all the details - and scribbling a note is definitely not good security practice. But a SmartMessaging text is persistent. You can come back to your message history, to get confirmation of the incident details.

PUBLISH DAILY NOTICES

Command staff need to be able to send out bulletins: important information like daily road closures and public events. But these nonurgent messages needn't clog up the radio system, when you can send them as voicenotes. Responders aren't distracted mid-incident: they can listen whenever it's safe and convenient to do so.

64



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⁶⁴ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf

⁶⁵ <https://video.motorolasolutions.com/detail/video/6195161012001>

LOCATION, TRACKING & MAPPING

SIMPLIFY INFORMATION. MAKE BETTER DECISIONS.



MONITOR ACTIVITY FROM ANYWHERE

View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.



ACT WITH THE NECESSARY CONTEXT

Communicate a more informed response to a critical incident and enhance responder safety for those in the field by accessing a common operating picture through CommandCentral Aware - directly from your agency's map.



COLLABORATE WITHOUT DISTRACTION

Control specific viewing permissions based on groups of users to ensure a focused response from every team member during a critical event. Filter your view to only the datasets you need in the moment.

66

ACCESS DATA FROM
CAD THROUGH
COMMANDCENTRAL AWARE,
ENHANCING THE COMMON
OPERATING PICTURE.



BROCHURE | COMMANDCENTRAL AWARE

67

⁶⁶ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

⁶⁷ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

FEATURES:

Unified Mapping: Utilizing a common Esri base map, geographically locate real-time events such as CAD incidents, device and unit location, alert and alarms, tactical decision data and camera locations. Incorporate other Esri-based map layers from your agency for enriched spatial orientation such as property boundaries, landmarks, buildings, and asset locations. In addition, streaming and stationary weather layers are provided to enhance visual situational awareness. Organize your devices through group management to further refine ownership to adhere to logical inter agency and intra agency configurations. Manage the content seen by these agencies via groups of users provisioned and authorized to see specific mapping layers.

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LOCATION, TRACKING, MAPPING & ALERTS

KEEP OFFICERS AND CITIZENS SAFE ON THE STREETS



RESPOND QUICKLY TO ESCALATING INCIDENTS

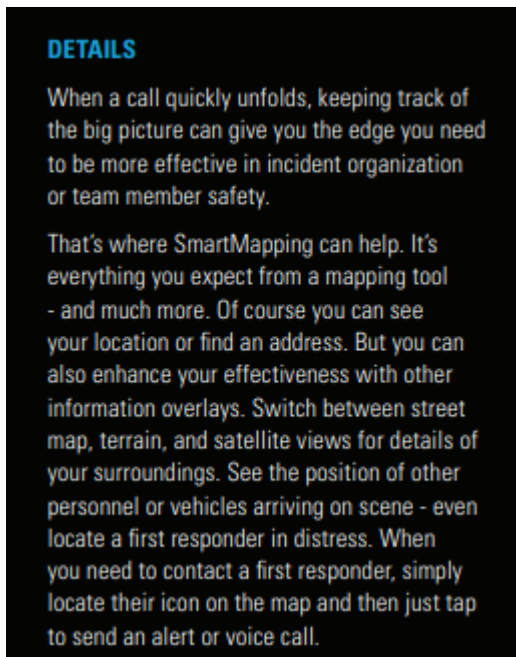
Responder alerts automatically show the command center what's happening to officers during an incident, whether that be an emergency, weapon drawn, vest pierce, man down alerts, and more. Alerts showing the location and type of incident on the consolidated map help dispatchers enhance situational awareness and improve officer and citizen safety.

69

⁶⁸ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

⁶⁹ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

56. Additionally, the exemplary Accused Products allow users to establish groups and to exchange messages via interaction with servers which provide the SmartMapping and SmartMessaging services and/or CommandCentral Aware services, among other relevant services. The exemplary Accused Products further allow users to retrieve map information from multiple sources including street-view maps, as well as satellite renderings.



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⁷⁰ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf

Always in the picture

Your first responders can't lose track of the big picture: their safety depends on it. But in the heat of an incident, they can get disoriented and lose sight of the team. That's where SmartMapping can help.



✓ **Increase awareness**

Allow your first responders to see the big picture, with a clear location map of the situation, right on their radios.

✓ **Enhance teamwork**

Empower your teams to communicate and coordinate better, even in the chaos of an emergency situation

✓ **Improve security**

Upgrade from consumer-grade mapping. Invest in a mission-critical application, integrated into your public safety radio system.

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LOCATION, TRACKING & MAPPING

SIMPLIFY INFORMATION. MAKE BETTER DECISIONS.



MONITOR ACTIVITY FROM ANYWHERE

View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.



ACT WITH THE NECESSARY CONTEXT

Communicate a more informed response to a critical incident and enhance responder safety for those in the field by accessing a common operating picture through CommandCentral Aware - directly from your agency's map.



COLLABORATE WITHOUT DISTRACTION


Control specific viewing permissions based on groups of users to ensure a focused response from every team member during a critical event. Filter your view to only the datasets you need in the moment.

72

⁷¹ https://www.motorolasolutions.com/en_us/products/p25-products/apx-mission-critical-applications/smartmapping.html

⁷² <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

ACCESS DATA FROM
CAD THROUGH
COMMANDCENTRAL AWARE,
ENHANCING THE COMMON
OPERATING PICTURE.



BROCHURE | COMMANDCENTRAL AWARE

73

FEATURES:

Unified Mapping: Utilizing a common Esri base map, geographically locate real-time events such as CAD incidents, device and unit location, alert and alarms, tactical decision data and camera locations. Incorporate other Esri-based map layers from your agency for enriched spatial orientation such as property boundaries, landmarks, buildings, and asset locations. In addition, streaming and stationary weather layers are provided to enhance visual situational awareness. Organize your devices through group management to further refine ownership to adhere to logical inter agency and intra agency configurations. Manage the content seen by these agencies via groups of users provisioned and authorized to see specific mapping layers.

74

⁷³ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

⁷⁴ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

LOCATION, TRACKING, MAPPING & ALERTS

KEEP OFFICERS AND CITIZENS SAFE ON THE STREETS




RESPOND QUICKLY TO ESCALATING INCIDENTS

Responder alerts automatically show the command center what's happening to officers during an incident, whether that be an emergency, weapon drawn, vest pierce, man down alerts, and more. Alerts showing the location and type of incident on the consolidated map help dispatchers enhance situational awareness and improve officer and citizen safety.

75

57. The exemplary Accused Products are programmed to form and join groups by transmitting messages:

LOCATE YOUR BACKUP



76

⁷⁵ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

⁷⁶ <https://video.motorolasolutions.com/detail/video/6195161012001>



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⁷⁷ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1aDY9>



DISTRIBUTE IMAGES

A description of the suspect is useful, but a picture is so much better. Simply upload a mugshot to the WAVE Dispatch Application, then share it with individuals or groups of responders over SmartMessaging. The image will be transferred quickly over broadband, then can be viewed and re-shared, right from the radio screen.

SHARE CALL AND ADDRESS INFORMATION

What was that address? What was the patient's name again? When you're responding to an incident, and away from your MDT, it's not easy to remember all the details - and scribbling a note is definitely not good security practice. But a SmartMessaging text is persistent. You can come back to your message history, to get confirmation of the incident details.

PUBLISH DAILY NOTICES

Command staff need to be able to send out bulletins: important information like daily road closures and public events. But these nonurgent messages needn't clog up the radio system, when you can send them as voicenotes. Responders aren't distracted mid-incident: they can listen whenever it's safe and convenient to do so.

⁷⁸ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf

LOCATION, TRACKING & MAPPING

SIMPLIFY INFORMATION. MAKE BETTER DECISIONS.



MONITOR ACTIVITY FROM ANYWHERE

View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.



ACT WITH THE NECESSARY CONTEXT

Communicate a more informed response to a critical incident and enhance responder safety for those in the field by accessing a common operating picture through CommandCentral Aware - directly from your agency's map.

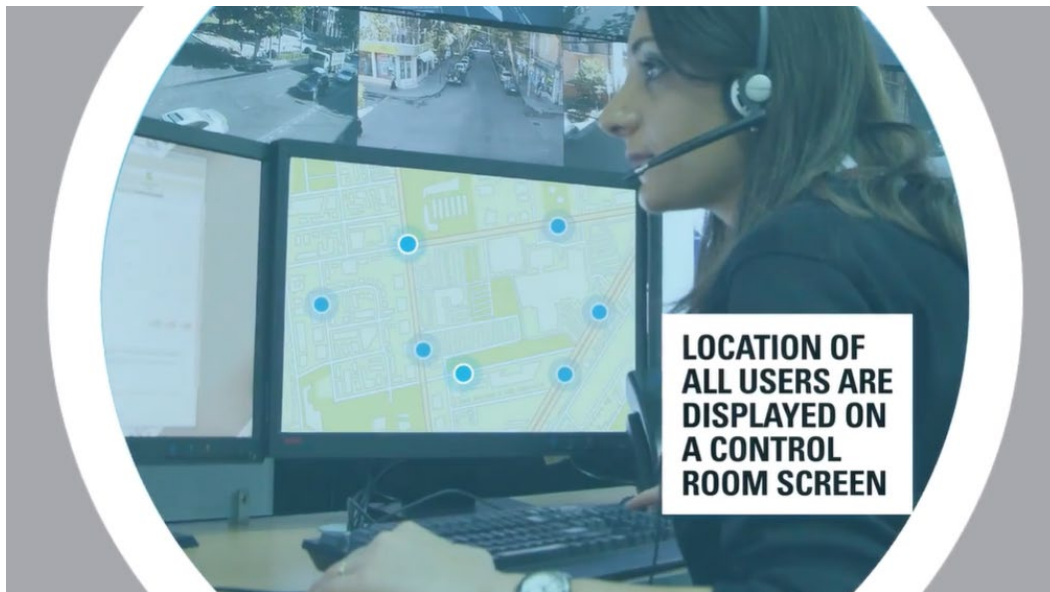


COLLABORATE WITHOUT DISTRACTION

Control specific viewing permissions based on groups of users to ensure a focused response from every team member during a critical event. Filter your view to only the datasets you need in the moment.

79

58. The exemplary Accused Products are further programmed to facilitate participation in the groups by communicating with one or more servers and sending to and receiving location information, as depicted below:



80

⁷⁹ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

⁸⁰ <https://video.motorolasolutions.com/detail/video/5041613245001>



⁸¹ <https://video.motorolasolutions.com/detail/video/5041613245001>

⁸² <https://video.motorolasolutions.com/detail/video/5041613245001>



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LOCATION, TRACKING, MAPPING & ALERTS

KEEP OFFICERS AND CITIZENS SAFE ON THE STREETS



RESPOND QUICKLY TO ESCALATING INCIDENTS

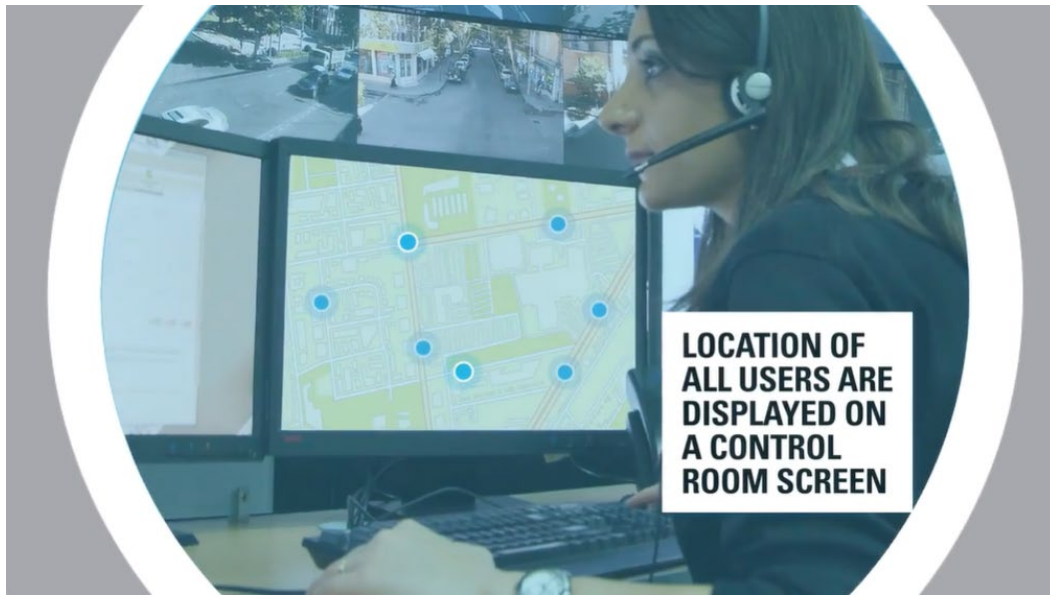
Responder alerts automatically show the command center what's happening to officers during an incident, whether that be an emergency, weapon drawn, vest pierce, man down alerts, and more. Alerts showing the location and type of incident on the consolidated map help dispatchers enhance situational awareness and improve officer and citizen safety.

84

59. The location information is presented on interactive displays on the exemplary Accused Products which include interactive maps and a plurality of user selectable symbols corresponding to other devices. The symbols are positioned on the map at positions corresponding to the locations of the other devices, as depicted below:

⁸³ <https://video.motorolasolutions.com/detail/video/5041613245001>

⁸⁴ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>



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⁸⁵ <https://video.motorolasolutions.com/detail/video/5041613245001>

⁸⁶ <https://video.motorolasolutions.com/detail/video/6195161012001>



87

60. The exemplary Accused Products are further programmed to permit users to request and display additional maps from additional servers by, for example, moving the map screen and/or by selecting satellite images or other types of maps. The exemplary Accused Products are further programmed to permit interaction with the display where a user may select one or more symbols and where the exemplary Accused Products further permit data to be sent to other devices based on that interaction.

⁸⁷ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1aDY9>



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⁸⁸ <https://video.motorolasolutions.com/detail/video/6195161012001>

⁸⁹ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1aDY9>



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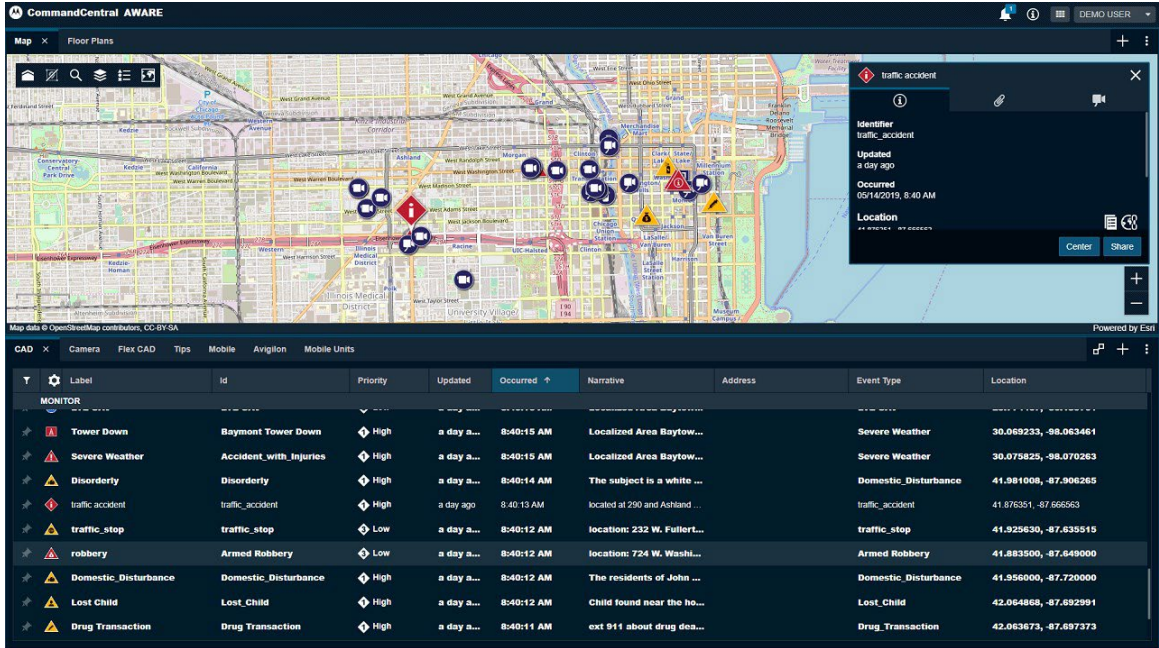
SHARE CALL AND ADDRESS INFORMATION

What was that address? What was the patient's name again? When you're responding to an incident, and away from your MDT, it's not easy to remember all the details - and scribbling a note is definitely not good security practice. But a SmartMessaging text is persistent. You can come back to your message history, to get confirmation of the incident details.

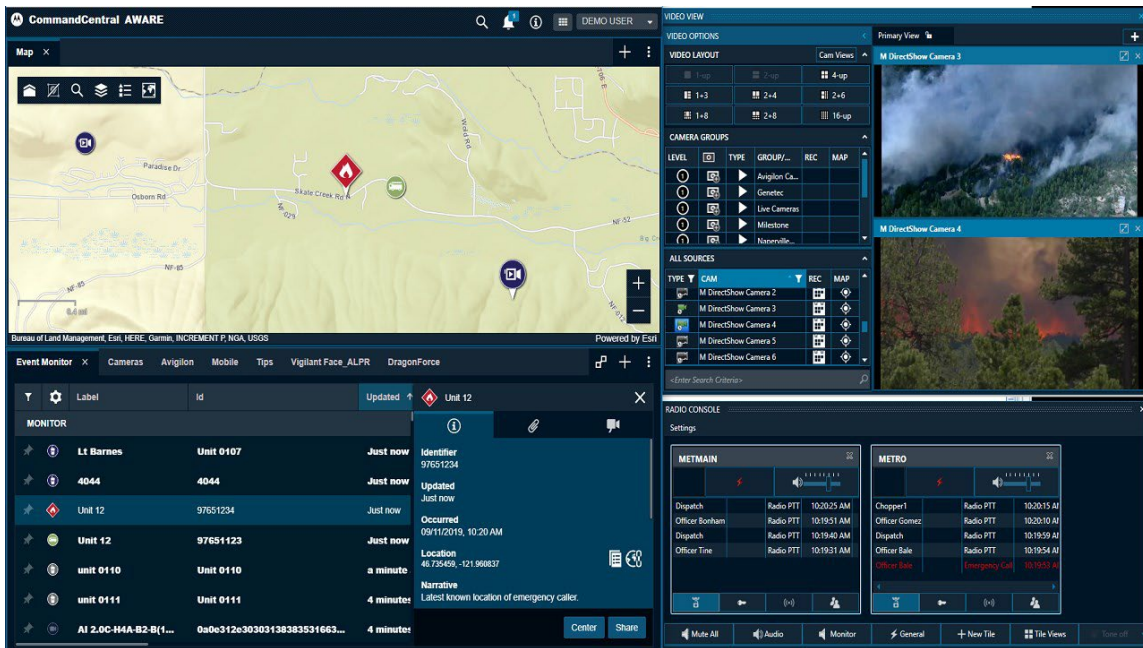
PUBLISH DAILY NOTICES

Command staff need to be able to send out bulletins: important information like daily road closures and public events. But these nonurgent messages needn't clog up the radio system, when you can send them as voicenotes. Responders aren't distracted mid-incident: they can listen whenever it's safe and convenient to do so.

⁹⁰ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf



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61. The Accused Products, such as Motorola CommandCentral Inform, SmartMapping, SmartMessaging, and Astro 25 Mission Critical Data, further include similar

⁹¹ <https://azuremarketplace.microsoft.com/en-us/marketplace/apps/motorolasolutionsinc.commandcentral-aware?tab=overview>

⁹² <https://azuremarketplace.microsoft.com/en-us/marketplace/apps/motorolasolutionsinc.commandcentral-aware?tab=overview>

features and functionality to CommandCentral Aware, and infringe in a substantially similar manner.⁹³

COMMANDCENTRAL INFORM

SIMPLIFY INFORMATION. MAKE THE BEST DECISIONS.

Can your team easily see the information that matters? A single piece of information can often make the difference in directing the safest response. Yet, ensuring everyone has access to the right information and can quickly understand its relevance can be difficult. Keep everyone informed and in sync with a map-based common operating picture available anywhere they are, on any device from CommandCentral Inform.



REQUEST A DEMO:
Register Online at motorolasolutions.com/spssdemo

MONITOR ACTIVITY FROM ANYWHERE
View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.

ACT WITH THE NECESSARY CONTEXT
Filter your view to only the datasets you need in the moment. Access critical event information such as incident reports, video, resource details, sensor statuses and more – directly from the map.

COLLABORATE WITHOUT DISTRACTION
Your common operating picture is “view-only” with specific viewing permissions based on team. This ensures everyone is on the same page, with the information that matters.

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⁹³ See, e.g., <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

⁹⁴ <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

KEY FEATURES

Unified Mapping: See events like CAD incidents and sensor alarms, alongside resource locations like personnel and cameras, visualized on an ESRI-based map that can be customized with any of your agency's other data layers. This view is shared with [CommandCentral Aware](#) and can even include data layers from [CommandCentral Analytics](#).

Desktop & Mobile Accessibility: Work seamlessly from desktop to mobile. CommandCentral Inform is accessible via web browser on any computer as well as from any tablet or smartphone running Android or iOS.

Data Layer Filtering: Each data source can be shown or hidden based on selecting or deselecting it in the data layer panel. This ensures users are seeing only what they need in that moment. Data layers can also be prioritized to ensure certain information takes visual precedence on the map.

Critical Information Display: Information associated with each event or resource on the map can be viewed in the critical information display. This includes things like incident details from a CAD event, video attachments or status readings from a sensor.

Team-Based Permissions: Restrict what personnel see based on what they need to be most effective. This ensures that consistent and relevant information is being referenced from a true common operating picture.

"View-Only" Information Access: Ensure workflows are unhindered by access to information in the simplest form possible. CommandCentral Inform's "view-only" design guarantees users are able to digest the information they need while staying focused.

SITUATIONAL INTELLIGENCE FOR YOUR ENTIRE OPERATION

CommandCentral Inform provides the consolidated, map-based common operating picture needed to enhance decision-making at any part of your operation. Our [CommandCentral Aware](#) application goes a step further to help you better support a response with more robust situational intelligence by integrating that map-based common operating picture with real-time streaming video and native ASTRO® 25 console communications. CommandCentral Aware and CommandCentral Inform are built to work together seamlessly so personnel are collaborating most effectively across your operation, with actionable intelligence.

INVEST FOR TODAY AND THE FUTURE WITH COMMANDCENTRAL

By integrating your technology investments with the cloud-based CommandCentral platform, you are breaking down silos so you can utilize future and existing technologies, together. Rapidly processing your various datasets extracts real-time, actionable intelligence that is then delivered through applications designed to meet your workflow needs.

Deploying with the cloud allows you to minimize capital expenditures, reduce overhead and easily scale to your agency's needs. You are also protected with end-to-end security, enabling compliance to all major security standards including CJIS, FedRAMP and FISMA.

If you ever have any questions or issues with your product, support services are included with your purchase of CommandCentral, available to you by phone or email 24/7/365.

95

BENEFITS

- **Stay On Track:** Get precise location information on a modern map interface — right on your radio.
- **Stay In Touch:** View the location of other first responders at a glance. See their status. Tap to communicate.
- **Stay Up-To-Date:** SmartMapping will evolve. Get ready for custom map integration, CAD integration, voice activation and much more.

96

⁹⁵ <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

⁹⁶ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf



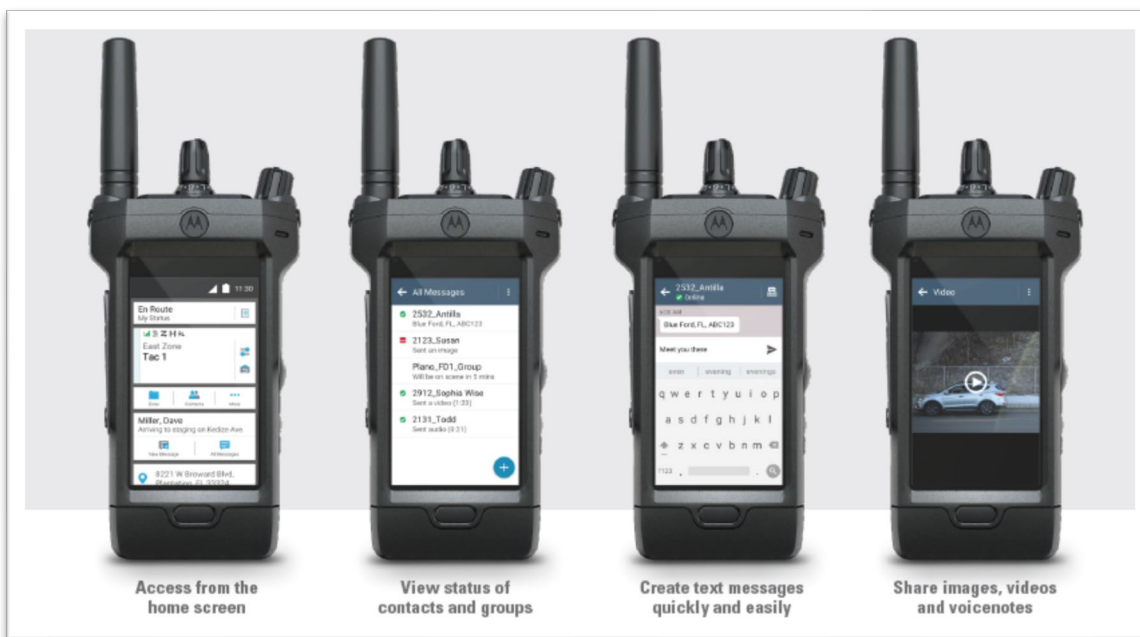
97

⁹⁷ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf

BENEFITS

- **Every Tool You Need:** Text messages, picture messages, voicenotes and videos. Share information with groups and individuals, in the way that suits you best.¹
- **Purpose-Built:** Built into the APX NEXT home screen, SmartMessaging is designed specifically for public safety communications.
- **Ready For The Future:** SmartMessaging has unlimited possibilities for future development - including multi-agency support, and ViQi integration.

98



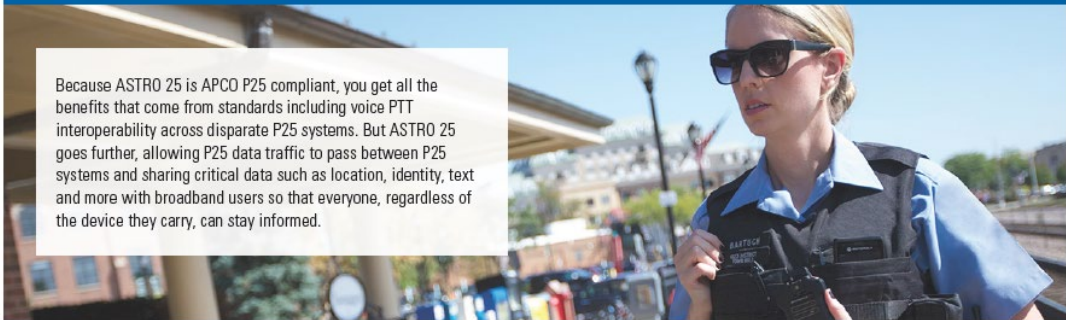
99

⁹⁸ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx-next_family_smartmessaging_fs0722.pdf

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INTEROPERABLE

Because ASTRO 25 is APCO P25 compliant, you get all the benefits that come from standards including voice PTT interoperability across disparate P25 systems. But ASTRO 25 goes further, allowing P25 data traffic to pass between P25 systems and sharing critical data such as location, identity, text and more with broadband users so that everyone, regardless of the device they carry, can stay informed.



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ASTRO 25 DATA APPLICATIONS AVAILABLE TODAY FROM MOTOROLA SOLUTIONS

 **LOCATION SERVICES**

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Track the location of your vehicles and personnel through either a dedicated GPS receiver or the integrated GPS in your APX radio.

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Get location updates from an APX radio on a TDMA channel, while a radio user is receiving voice audio or in hangtime during an active call.

LOCATION ON PTT
Get location updates from your radios every time they push the PTT button without adding any additional traffic load on either the data or voice channels – even receive updates during emergency calls.

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OVER THE AIR SOFTWARE UPDATE
Update your entire fleet of radios in less than a week with no service disruption.

PROGRAMMING OVER P25 (POP25)
Reprogram radios over the air, eliminating the need to bring the radios into a service shop, saving time and money.

ASTRO 25 OVER THE AIR REKEYING (OTAR)
Quickly change and manage the distribution of encryption keys over the air, increasing security and simplifying logistics of key management.

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ASTRO 25 ADVANCED MESSAGING SOLUTIONS
Send and receive pre-programmed or free-form text messages to individuals or groups directly from two-way radios.

TALKGROUP TEXT MESSAGING
Broadcast detailed information via text to everyone in a talkgroup simultaneously.

MACH ALERT FIRE STATION AUTOMATION AND ALERTING
Alert multiple fire stations simultaneously and control elements in the firehouse such as closing doors and turning off stoves to improve response time, efficiency and safety.

 **MONITORING AND CONTROL**

APX PERSONNEL ACCOUNTABILITY
Streamline on-scene roll calls, alert your team to changing incident situation and improve personnel safety.

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From site security to fluid flows and electric grids, monitor and control remote sites and equipment with a variety of applications tailored to industry specific needs.

101

¹⁰⁰ <https://www.motorolasolutions.com/content/dam/msi/docs/astro-25/astro-25-mission-critical-data-brochure.pdf>

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62. AGIS Software has suffered damages as a result of Defendant's direct and indirect infringement of the '123 Patent in an amount to be proved at trial.

63. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of Defendant's infringement of the '123 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

COUNT V
(Infringement of the '829 Patent)

64. Paragraphs 1 through 23 are incorporated herein by reference as if fully set forth in their entireties.

65. AGIS Software has not licensed or otherwise authorized Defendant to make, use, offer for sale, sell, distribute, export from, or import any products that embody the inventions of the '829 Patent.

66. Defendant has and continues to directly infringe at least claim 34 of the '829 Patent, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products without authority and in violation of 35 U.S.C. § 271(a).

67. Defendant has and continues to indirectly infringe at least claim 34 of the '829 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the infringing Accused Products and by instructing users of the Accused Products to perform at least the method of claim 34 in the '829 Patent. For example, Defendant, with knowledge that the Accused Products infringe the '829 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce direct infringement of at least claim 34

of the '829 Patent in violation of 35 U.S.C. § 271(b). Alternatively, Defendant believed there was a high probability that others would infringe the '829 Patent but remained willfully blind to the infringing nature of others' actions.

68. For example, Defendant has indirectly infringed and continues to indirectly infringe at least claim 34 of the '829 Patent in the United States because Defendant's customers use the Accused Products, including at least SmartMapping and SmartMessaging applications and/or services or CommandCentral Aware applications and/or services, alone or in conjunction with additional Accused Products, in accordance with Defendant's instructions and thereby directly infringe at least one claim of the '829 Patent in violation of 35 U.S.C. § 271. Defendant directly and/or indirectly intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installations and/or user guides, such as those located at one or more of the following: https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf;
https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf;
https://www.motorolasolutions.com/content/dam/msi/docs/global-software/commandcentral-aware/cc_aware_brochure_web.pdf;
<https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>; and Defendant agents and representatives located within this Judicial District. Defendant is thereby liable for infringement of the '829 Patent under 35 U.S.C. § 271(b).

69. Alternatively, Defendant believed there was a high probability that others would infringe the '829 Patent but remained willfully blind to the infringing nature of others' actions. For example, Defendant directly infringes and/or indirectly infringes by instructing its customers

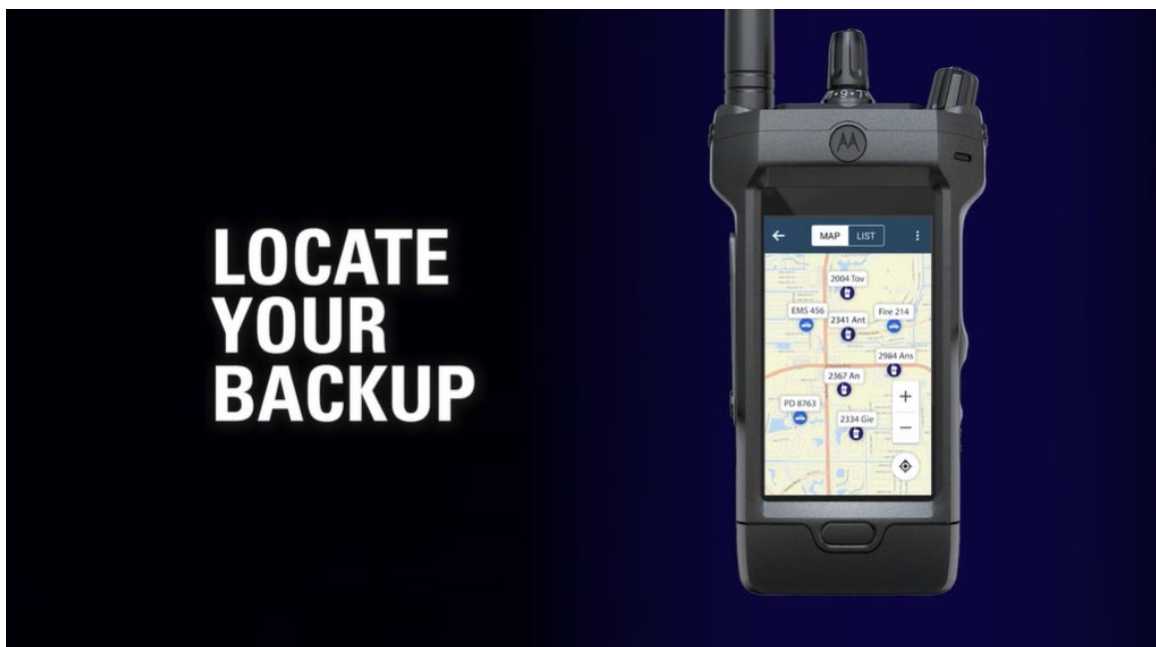
to infringe by a system comprising: a second device programmed to perform operations comprising: receiving from a first device via a first server, a request to join a group, wherein the group includes the first device; sending, to the first server, an indication of acceptance of the request, wherein the first server is configured to join the first device to the group based on the acceptance of the request, and wherein joining the first device to the group comprises authorizing the first device to repeatedly share device location information and repeatedly engage in remote control operations with each device included in the group; sending a first message to the first server, wherein the first message comprises data identifying the first device and a request for a first updated location of the first device, and wherein the first server is configured to send a second message to the first device based on and in response to receiving the first message from the second device, wherein the second message comprises a request for the first updated location of the first device; after sending the first message, receiving, from the first server, a response to the first message, the response including first location information comprising the first updated location of the first device; receiving from a second server, georeferenced map data; presenting, via a display of the second device, a georeferenced map based on the georeferenced map data and a symbol corresponding to the first device; wherein the symbol is positioned on the georeferenced map at a first position corresponding to the first updated location of the first device, and wherein the georeferenced map data relate positions on the georeferenced map to spatial coordinates; after receiving the first location information and the georeferenced map data, and after presenting the georeferenced map and the symbol positioned on the georeferenced map at the first position corresponding to the first updated location of the first device, receiving second location information comprising a second updated location of the first device from the first server, and using the server-provided georeferenced map data and the second location information to

reposition the symbol on the georeferenced map at a second position corresponding to the second updated location of the first device; and identifying user interaction with the display specifying an action and, based thereon, sending, to the first server, a third message related to remotely controlling the first device to perform an action, wherein the first server is configured to send a fourth message to the first device based on receiving the third message from the second device, wherein the fourth message relates to remotely controlling the first device to perform the action, and wherein the first device is configured to perform the action based on receiving the fourth message. For example, the Accused Products include features, as shown below.

70. For example, Defendant's Accused Products allow users to share their locations and view other users' locations on a map and to communicate with those users via the Secure Family App.

71. Additionally, the exemplary Accused Products allow users to establish groups and to exchange messages via interaction with servers which provide the SmartMapping and SmartMessaging services and/or CommandCentral Aware services, among other relevant services.

72. The exemplary Accused Products are programmed to form and join groups by transmitting messages:



102

¹⁰² <https://video.motorolasolutions.com/detail/video/6195161012001>



103

¹⁰³ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1aDY9>



DISTRIBUTE IMAGES

A description of the suspect is useful, but a picture is so much better. Simply upload a mugshot to the WAVE Dispatch Application, then share it with individuals or groups of responders over SmartMessaging. The image will be transferred quickly over broadband, then can be viewed and re-shared, right from the radio screen.

SHARE CALL AND ADDRESS INFORMATION

What was that address? What was the patient's name again? When you're responding to an incident, and away from your MDT, it's not easy to remember all the details - and scribbling a note is definitely not good security practice. But a SmartMessaging text is persistent. You can come back to your message history, to get confirmation of the incident details.

PUBLISH DAILY NOTICES

Command staff need to be able to send out bulletins: important information like daily road closures and public events. But these nonurgent messages needn't clog up the radio system, when you can send them as voicenotes. Responders aren't distracted mid-incident: they can listen whenever it's safe and convenient to do so.

¹⁰⁴ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmessaging.pdf

LOCATION, TRACKING & MAPPING

SIMPLIFY INFORMATION. MAKE BETTER DECISIONS.



MONITOR ACTIVITY FROM ANYWHERE

View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.



ACT WITH THE NECESSARY CONTEXT

Communicate a more informed response to a critical incident and enhance responder safety for those in the field by accessing a common operating picture through CommandCentral Aware - directly from your agency's map.

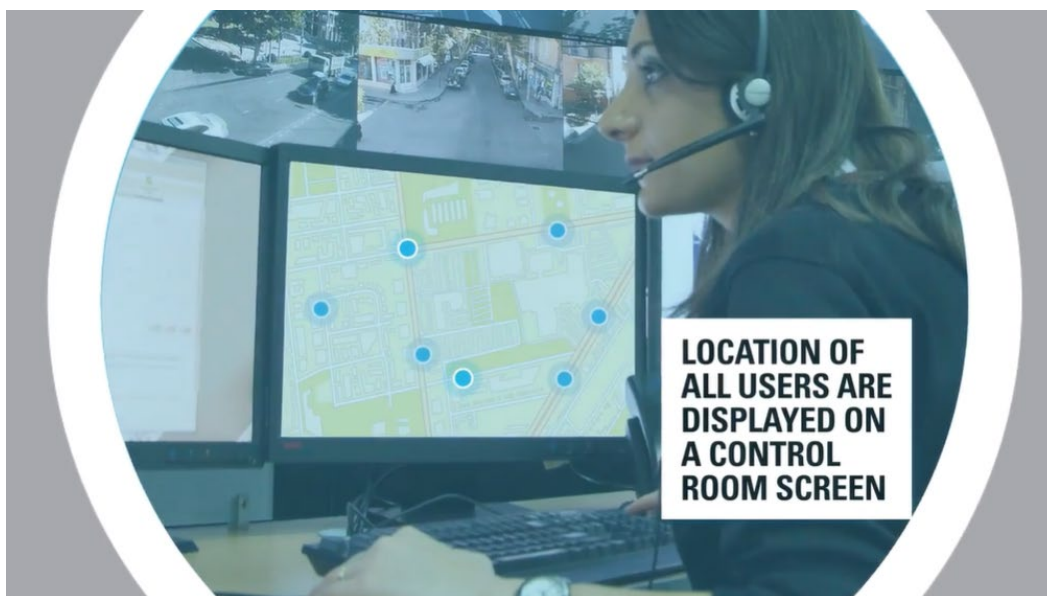


COLLABORATE WITHOUT DISTRACTION

Control specific viewing permissions based on groups of users to ensure a focused response from every team member during a critical event. Filter your view to only the datasets you need in the moment.

105

73. The exemplary Accused Products are further programmed to facilitate participation in the groups by communicating with one or more servers and sending to and receiving location information, as depicted below:



106

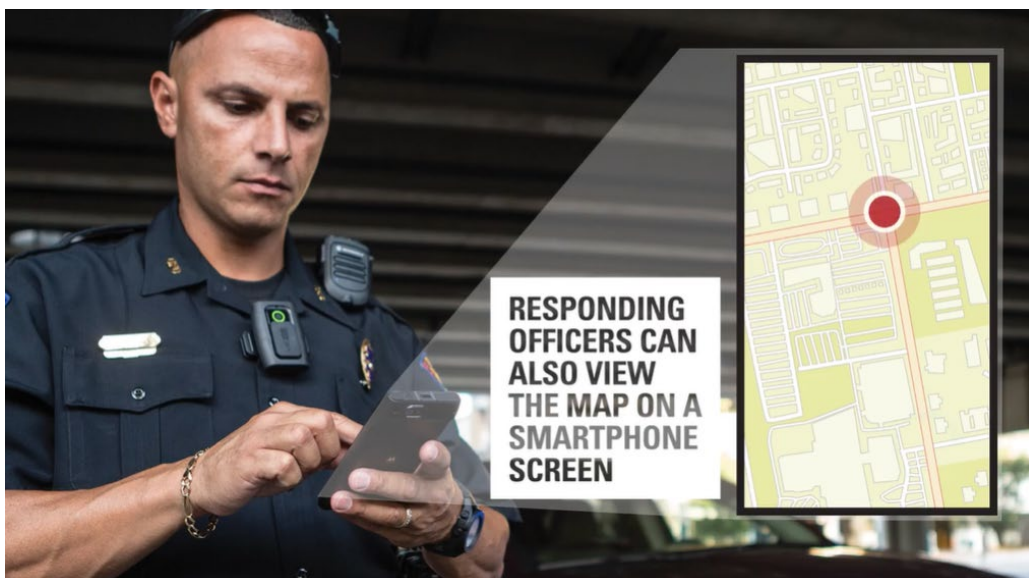
¹⁰⁵ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>

¹⁰⁶ <https://video.motorolasolutions.com/detail/video/5041613245001>



¹⁰⁷ <https://video.motorolasolutions.com/detail/video/5041613245001>

¹⁰⁸ <https://video.motorolasolutions.com/detail/video/5041613245001>



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**LOCATION, TRACKING,
MAPPING & ALERTS**
KEEP OFFICERS AND CITIZENS SAFE ON THE STREETS



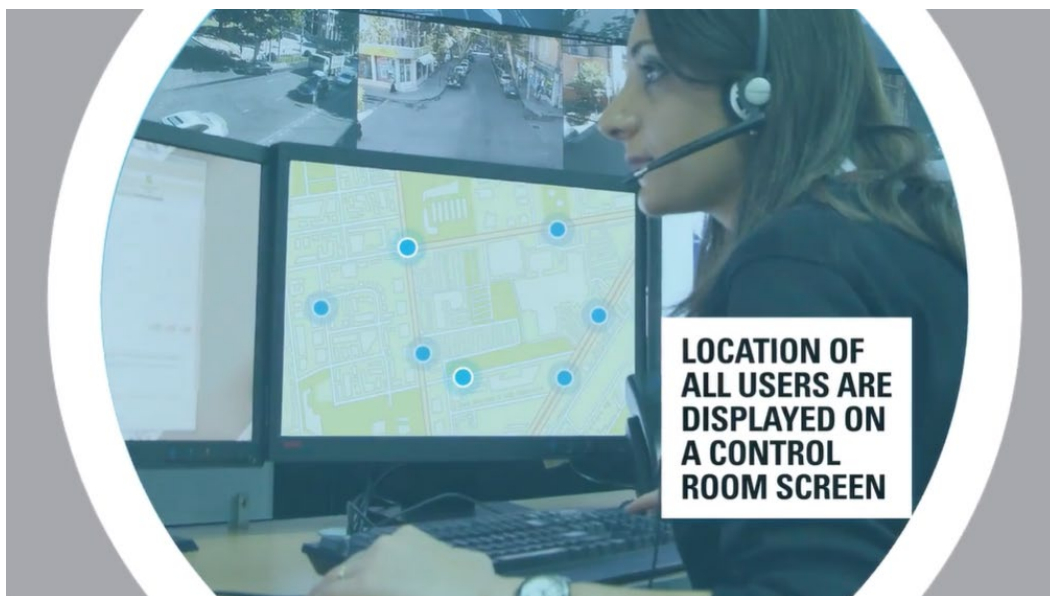

RESPOND QUICKLY TO ESCALATING INCIDENTS
Responder alerts automatically show the command center what's happening to officers during an incident, whether that be an emergency, weapon drawn, vest pierce, man down alerts, and more. Alerts showing the location and type of incident on the consolidated map help dispatchers enhance situational awareness and improve officer and citizen safety.

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74. The location information is presented on interactive displays on the exemplary Accused Products which include interactive maps and a plurality of user selectable symbols corresponding to other devices. The symbols are positioned on the map at positions corresponding to the locations of the other devices, as depicted below:

¹⁰⁹ <https://video.motorolasolutions.com/detail/video/5041613245001>

¹¹⁰ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1dHFq>



111



112

¹¹¹ <https://video.motorolasolutions.com/detail/video/5041613245001>

¹¹² <https://video.motorolasolutions.com/detail/video/6195161012001>



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CommandCentral AWARE

Map x Floor Plans

Map data © OpenStreetMap contributors, CC-BY-SA

Powered by Esri

Label	Id	Priority	Updated	Occurred	Narrative	Address	Event Type	Location
Tower Down	Baymont Tower Down	High	a day a...	8:40:15 AM	Localized Area Baytow...		Severe Weather	30.069233, -98.063461
Severe Weather	Accident_with_Injuries	High	a day a...	8:40:15 AM	Localized Area Baytow...		Severe Weather	30.075825, -98.070263
Disorderly	Disorderly	High	a day a...	8:40:14 AM	The subject is a white ...		Domestic Disturbance	41.981008, -87.906265
traffic accident	traffic_accident	High	a day ago	8:40:13 AM	located at 290 and Ashland ...		traffic_accident	41.876351, -87.666563
traffic stop	traffic_stop	Low	a day a...	8:40:12 AM	location: 232 W. Fullert...		traffic_stop	41.929630, -87.635515
robbery	Armed Robbery	Low	a day a...	8:40:12 AM	location: 724 W. Washi...		Armed Robbery	41.883500, -87.649000
Domestic Disturbance	Domestic Disturbance	High	a day a...	8:40:12 AM	The residents of John ...		Domestic Disturbance	41.956000, -87.720000
Lost Child	Lost_Child	High	a day a...	8:40:12 AM	Child found near the ho...		Lost_Child	42.064869, -87.692991
Drug Transaction	Drug Transaction	High	a day a...	8:40:11 AM	ext 911 about drug dea...		Drug_Transaction	42.063673, -87.697373

114

¹¹³ <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RW1aDY9>

¹¹⁴ <https://azuremarketplace.microsoft.com/en-us/marketplace/apps/motorolasolutionsinc.commandcentral-aware?tab=overview>

75. The exemplary Accused Products are further programmed to permit users to request and display additional maps from additional servers by, for example, moving the map screen and/or by selecting satellite images or other types of maps. The exemplary Accused Products are further programmed to permit interaction with the display where a user may select one or more symbols and where the exemplary Accused Products further permit data to be sent to other devices based on that interaction.

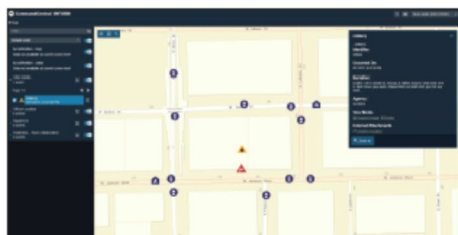
76. The Accused Products, such as Motorola CommandCentral Inform, SmartMapping, SmartMessaging, and Astro 25 Mission Critical Data, further include similar features and functionality to CommandCentral Aware and infringe in a substantially similar manner.¹¹⁵

¹¹⁵ See, e.g., <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>; https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx_next_fact_sheet_smartmapping.pdf; https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx-next_family_smartmessaging_fs0722.pdf; <https://www.motorolasolutions.com/content/dam/msi/docs/astro-25/astro-25-mission-critical-data-brochure.pdf>

COMMANDCENTRAL INFORM

SIMPLIFY INFORMATION. MAKE THE BEST DECISIONS.

Can your team easily see the information that matters? A single piece of information can often make the difference in directing the safest response. Yet, ensuring everyone has access to the right information and can quickly understand its relevance can be difficult. Keep everyone informed and in sync with a map-based common operating picture available anywhere they are, on any device from CommandCentral Inform.



REQUEST A DEMO:
 Register Online at motorolasolutions.com/spssdemo

MONITOR ACTIVITY FROM ANYWHERE

View all of your location-based data together, in real-time, on a single map display. This common operating picture can be accessed anywhere, from any internet-connected device.

ACT WITH THE NECESSARY CONTEXT

Filter your view to only the datasets you need in the moment. Access critical event information such as incident reports, video, resource details, sensor statuses and more – directly from the map.

COLLABORATE WITHOUT DISTRACTION

Your common operating picture is "view-only" with specific viewing permissions based on team. This ensures everyone is on the same page, with the information that matters.

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¹¹⁶ <https://www.motorolasolutions.com/content/dam/msi/docs/products/smart-public-safety-solutions/ilps/commandcentral-inform/commandcentral-inform-data-sheet.pdf>

KEY FEATURES

Unified Mapping: See events like CAD incidents and sensor alarms, alongside resource locations like personnel and cameras, visualized on an ESRI-based map that can be customized with any of your agency's other data layers. This view is shared with [CommandCentral Aware](#) and can even include data layers from [CommandCentral Analytics](#).

Desktop & Mobile Accessibility: Work seamlessly from desktop to mobile. CommandCentral Inform is accessible via web browser on any computer as well as from any tablet or smartphone running Android or iOS.

Data Layer Filtering: Each data source can be shown or hidden based on selecting or deselecting it in the data layer panel. This ensures users are seeing only what they need in that moment. Data layers can also be prioritized to ensure certain information takes visual precedence on the map.

Critical Information Display: Information associated with each event or resource on the map can be viewed in the critical information display. This includes things like incident details from a CAD event, video attachments or status readings from a sensor.

Team-Based Permissions: Restrict what personnel see based on what they need to be most effective. This ensures that consistent and relevant information is being referenced from a true common operating picture.

"View-Only" Information Access: Ensure workflows are unhindered by access to information in the simplest form possible. CommandCentral Inform's "view-only" design guarantees users are able to digest the information they need while staying focused.

SITUATIONAL INTELLIGENCE FOR YOUR ENTIRE OPERATION

CommandCentral Inform provides the consolidated, map-based common operating picture needed to enhance decision-making at any part of your operation. Our [CommandCentral Aware](#) application goes a step further to help you better support a response with more robust situational intelligence by integrating that map-based common operating picture with real-time streaming video and native ASTRO® 25 console communications. CommandCentral Aware and CommandCentral Inform are built to work together seamlessly so personnel are collaborating most effectively across your operation, with actionable intelligence.

INVEST FOR TODAY AND THE FUTURE WITH COMMANDCENTRAL

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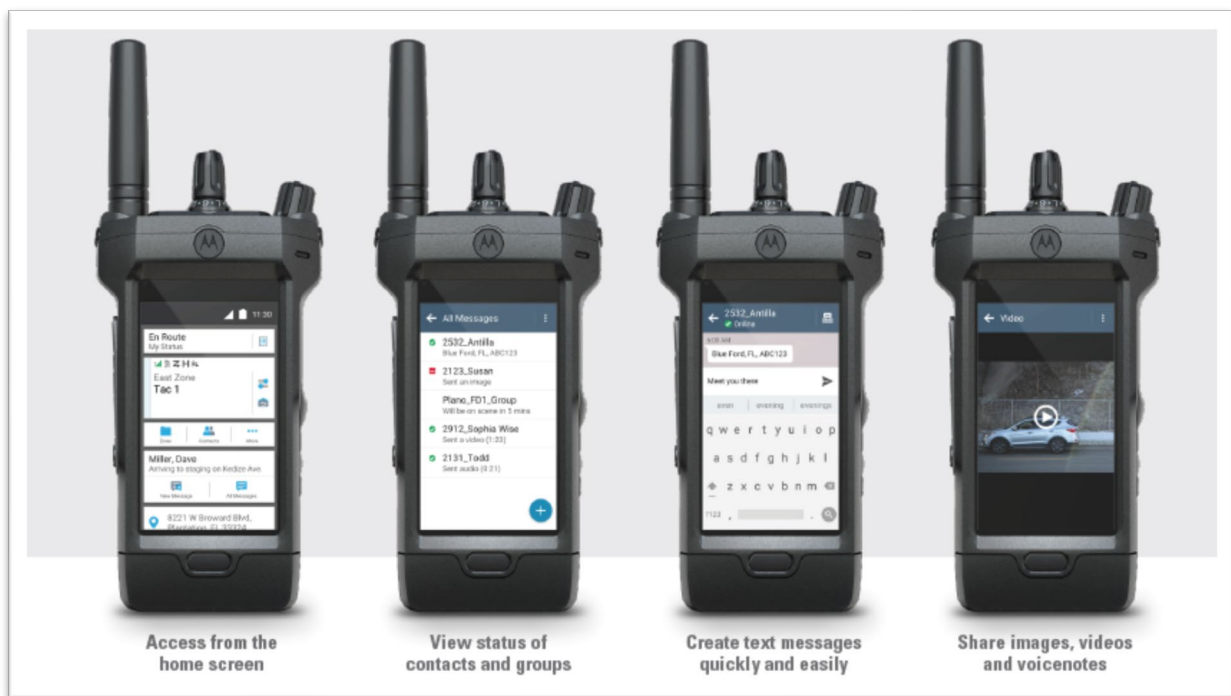
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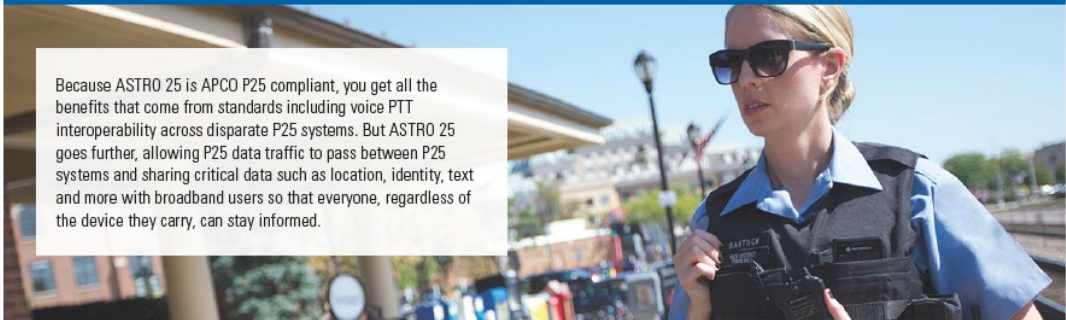
121

¹²⁰ https://www.motorolasolutions.com/content/dam/msi/Products/apx-next1/resources/apx-next_family_smartmessaging_fs0722.pdf

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78. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of Defendant's infringement of the '829 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, AGIS Software 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 each of the Patents-in-Suit;
- b. Entry of judgment declaring that Defendant's infringement of the Patents-in-Suit has been willful and deliberate;
- c. 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 it, from further acts of infringement of the Patents-in-Suit;
- d. An order awarding damages sufficient to compensate AGIS Software for Defendant's infringement of the Patents-in-Suit, but in no event less than a reasonable royalty, together with interest and costs;
- e. An order awarding AGIS Software treble damages under 35 U.S.C. § 284 as a result of Defendant's willful and deliberate infringement of the Patents-in-Suit;
- f. Entry of judgment declaring that this case is exceptional and awarding AGIS Software its costs and reasonable attorney fees under 35 U.S.C. § 285; and

g. Such other and further relief as the Court deems just and proper.

Dated: July 29, 2024

Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant
NY Bar No. 2219392
Email: ffabricant@fabricantllp.com
Peter Lambrianakos
NY Bar No. 2894392
Email: plambrianakos@fabricantllp.com
Vincent J. Rubino, III
NY Bar No. 4557435
Email: vrubino@fabricantllp.com
FABRICANT LLP
411 Theodore Fremd Avenue,
Suite 206 South
Rye, New York 10580
Telephone: (212) 257-5797
Facsimile: (212) 257-5796

Samuel F. Baxter
Texas State Bar No. 01938000
Email: sbaxter@mckoolsmith.com
Jennifer L. Truelove
Texas State Bar No. 24012906
Email: jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.
104 E. Houston Street, Suite 300
Marshall, Texas 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

***ATTORNEYS FOR PLAINTIFF
AGIS SOFTWARE DEVELOPMENT LLC***