

**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.	§	
	§	
AT&T INC., AT&T COMMUNICATIONS LLC, AT&T SERVICES, INC., AT&T MOBILITY LLC, and AT&T MOBILITY II LLC,	§	
	§	
Defendants.	§	
	§	

PLAINTIFF’S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, AGIS Software Development LLC (“AGIS Software” or “Plaintiff”) files this original Complaint against Defendants AT&T Inc., AT&T Communications LLC, AT&T Services Inc., AT&T Mobility LLC, and AT&T Mobility II LLC (collectively, “AT&T” or “Defendants”) 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. Defendant AT&T Inc. (“AT&T Inc.”) is a Delaware corporation and maintains its principal place of business at Whitacre Tower, 208 South Akard Street, Dallas, Texas, 75202 and

may be served with process via its registered agent, CT Corporation System at 1999 Bryan Street, Suite 900, Dallas, Texas, 75201.

3. Defendant AT&T Communications LLC (“AT&T Communications”) is a Delaware corporation with its principal place of business at 208 South Ackard Street, Dallas, Texas 75202. AT&T Communications may be served through its registered agent for service, the Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801. AT&T Communications is a wholly-owned subsidiary of AT&T Inc.

4. Defendant AT&T Services, Inc. (“AT&T Services”) is a Delaware corporation and maintains its principal place of business at Whitacre Tower, 208 South Akard Street, Dallas, Texas, 75202. AT&T Services may be served with process via its registered agent, CT Corporation System at 1999 Bryan Street, Suite 900, Dallas, Texas, 75201. AT&T Services is a subsidiary of and owned by AT&T Inc.

5. Defendant AT&T Mobility LLC (“AT&T Mobility”) is a is a Delaware limited liability company and maintains its principal place of business at 1025 Lenox Park Boulevard NE, Atlanta, Georgia 30319. AT&T Mobility may be served with process via its registered agent, CT Corporation System at 1999 Bryan Street, Suite 900, Dallas, Texas, 75201. AT&T Mobility is a subsidiary of and owned by AT&T Inc.

6. Defendant AT&T Mobility II LLC (“AT&T Mobility II”) is a Delaware limited liability company and maintains its principal place of business at 1025 Lenox Park Boulevard NE, Atlanta, Georgia 30319. AT&T Mobility II may be served through its registered agent for service, The Corporation Trust Company, 1209 Orange, Street, Wilmington, Delaware 19801. AT&T Mobility II is a subsidiary of and owned by AT&T Inc.

JURISDICTION AND VENUE

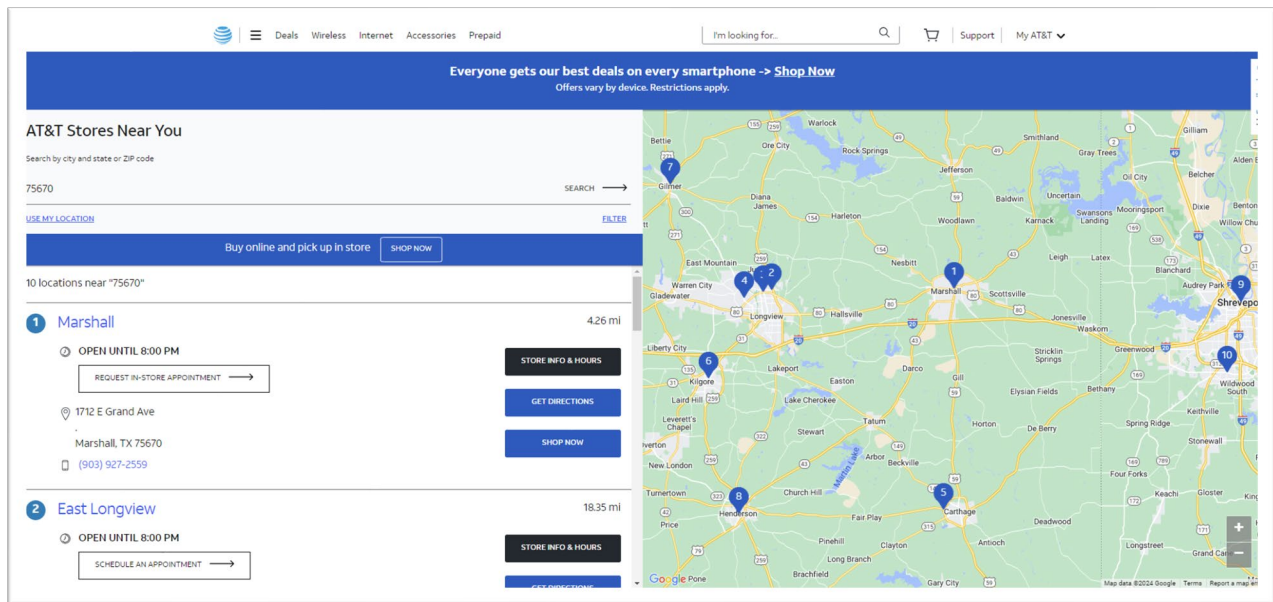
7. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1338(a), and 1367.

8. This Court has personal jurisdiction over AT&T in this action because AT&T has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum, such that the exercise of jurisdiction over AT&T would not offend traditional notions of fair play and substantial justice. AT&T 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.

9. Venue is proper in this Judicial District pursuant to 28 U.S.C. §§ 1391 and 1400(b). AT&T is registered to do business in Texas and, upon information and belief, AT&T has transacted business in the Eastern District of Texas and has committed acts of direct and indirect infringement in the Eastern District of Texas. AT&T has regular and established places of business in this Judicial District, including at least its retail stores and offices located at 712 East Grand Avenue, Marshall, Texas 75670; 3300 Dallas Parkway, Suite 100, Plano, Texas 75093; 6000 North Central Expressway, Plano, Texas 75074; 701 North Central Expressway, Suite 400, Plano, Texas 75075; 8305 Preston Road, Suite 400C, Plano, Texas 75024; 8700 Preston Road, Suite 117, Plano, Texas 75024; 3400 West Plano Parkway, Plano, Texas 75075; 3400 West Plano Parkway, Plano, Texas 75075; AT&T Foundry - 2900 West Plano Parkway, Plano, Texas 75075; 3300 East Renner Road, Richardson, Texas 75082; 1410 East Renner Road, Richardson, Texas 75082; 2180 North

Glenville Drive, Richardson, Texas 75082; 1125 East Campbell Road, Richardson, Texas 75081; 2270 Lakeside Boulevard, Richardson, Texas 75082; 2220 Campbell Creek Boulevard, Richardson, Texas 75082; 250 Richmond Ranch Road, Texarkana, Texas 75503; 4901 North Stateline, Texarkana, Texas 75503; and 5112 Summerhill Road, Texarkana, Texas 75503.

10. AT&T also operates numerous brick and mortar retail stores in this District. These retail stores are physically located within this District, and are regular and established places of business of AT&T. AT&T’s website provides the at “AT&T Stores Near You” feature which shows the locations of such AT&T retail stores within this District:¹



11. For example, AT&T further maintains a Foundry innovation space located at 2900 West Plano Parkway, Plano, Texas 75075 to, among other things, “showcase our edge-to-edge network capabilities and develop transformative technologies.”² On information and belief, each AT&T entity, including AT&T Communications, AT&T Services, AT&T Mobility, and AT&T

¹ <https://www.att.com/stores/>

² See https://about.att.com/story/2018/plano_foundry.html

Mobility II collaborate with, operate from, and design, test, use, and sell telecommunications services through this AT&T Foundry location in Plano, Texas.

12. AT&T also maintains a regular and established place of business in this District that it calls the “AT&T 5G Innovation Studio,” which is also located in Plano, Texas.³ AT&T describes the “AT&T 5G Innovation Studio” as follows: “The studio, located in Plano, Texas, brings together the power of AT&T’s business, consumer and network organizations to accelerate the path to market for new 5G-centric product offerings and key initiatives. . . . In this space, we’ll work with customers and industry collaborators to ideate, test and validate new 5Gcentric applications across a variety of industries.”⁴

13. Of AT&T’s nearly 5,000 locations in the United States, AT&T owns and operates 593 locations in the State of Texas, making up approximately 11% of its entire U.S. presence, and making Texas the state with the highest number of AT&T locations.⁵

14. On information and belief, each AT&T entity maintains corporate offices in this District, specifically at 3400 West Plano Parkway, Plano, Texas 75075.⁶

15. At the above listed retail stores, foundry, and offices, each AT&T entity maintains a regular and established place of business where one or more employees and/or agents of AT&T are routinely physically present for the purpose of conducting AT&T’s business at said locations on behalf of or otherwise at the direction of AT&T. Upon information and belief, each AT&T entity conducts operations at one or more of these locations.

³ https://about.att.com/pages/5g_innovation_studio.html

⁴ *Id.*

⁵ See <https://www.att.com/stores/texas>

⁶ <https://www.waze.com/live-map/directions/us/tx/plano/atandt-plano-campus?to=place.ChIJNThutXliTIYRqYQkZimFV74>

16. AT&T has also admitted or not contested that the Eastern District of Texas is a proper venue for patent infringement against AT&T. *See, e.g., Daingean Technologies LTC. v. AT&T Inc.*, No. 2:23-cv-00123, Dkt. 22 ¶ 24 (E.D. Tex. June 1, 2023) (“AT&T does not contest that venue is proper in this district for purposes of this litigation”); *Wireless Alliance, LLC v. AT&T Mobility LLC*, No. 2:23-cv-00095, Dkt. 11 ¶¶ 9-10 (E.D. Tex. May 26, 2023); *Innovative Sonic Ltd., et. al., v. AT&T Corp., et. al.*, No. 2:23-cv-00489, Dkt. 29 at ¶ 8 (E.D. Tex. January 18, 2024).

PATENTS-IN-SUIT

17. 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 available at: <https://ppubs.uspto.gov/pubwebapp/external.html?q=8,213,970.pn.&db=USPAT>.

18. 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 available at: <https://ppubs.uspto.gov/pubwebapp/external.html?q=9,445,251.pn.&db=USPAT>.

19. 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 available at: <https://ppubs.uspto.gov/pubwebapp/external.html?q=9,467,838.pn.&db=USPAT>.

20. 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 available at: <https://ppubs.uspto.gov/pubwebapp/external.html?q=9,820,123.pn.&db=USPAT>.

21. 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 available at: <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/9749829>.

22. 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

23. 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.

24. 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.

25. 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.

26. Mr. Beyer has maintained longstanding ties to Texas and the Western 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.

27. AGIS Software licenses its patent portfolio, including the 8,213,970, 9,445,251, 9,467,838, 9,820,123, and 9,749,829 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).

28. AT&T has manufactured, used, marketed, distributed, sold, offered for sale, and exported from and imported into the United States products and software that infringe the Patents-in-Suit, e.g., including at least the AT&T Secure Family application, AT&T Secure Family Companion application,⁷ AT&T Fleet Complete applications and systems, AT&T Fleet Tracker applications and systems,⁸ AT&T Fleet Management applications and systems, AT&T Workforce Manager applications and systems, AT&T FirstNet applications and systems, AT&T FirstNet Messaging applications and systems, AT&T FirstNet Push-to-Talk applications and systems,

⁷ See

https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

⁸ See <https://www.business.att.com/products/fleet-complete.html>

AT&T Enhanced PTT, AT&T FirstNet Rapid Response, AT&T amiGO, including all related services and infrastructures (*e.g.*, servers) (collectively, the “Accused Products”).⁹

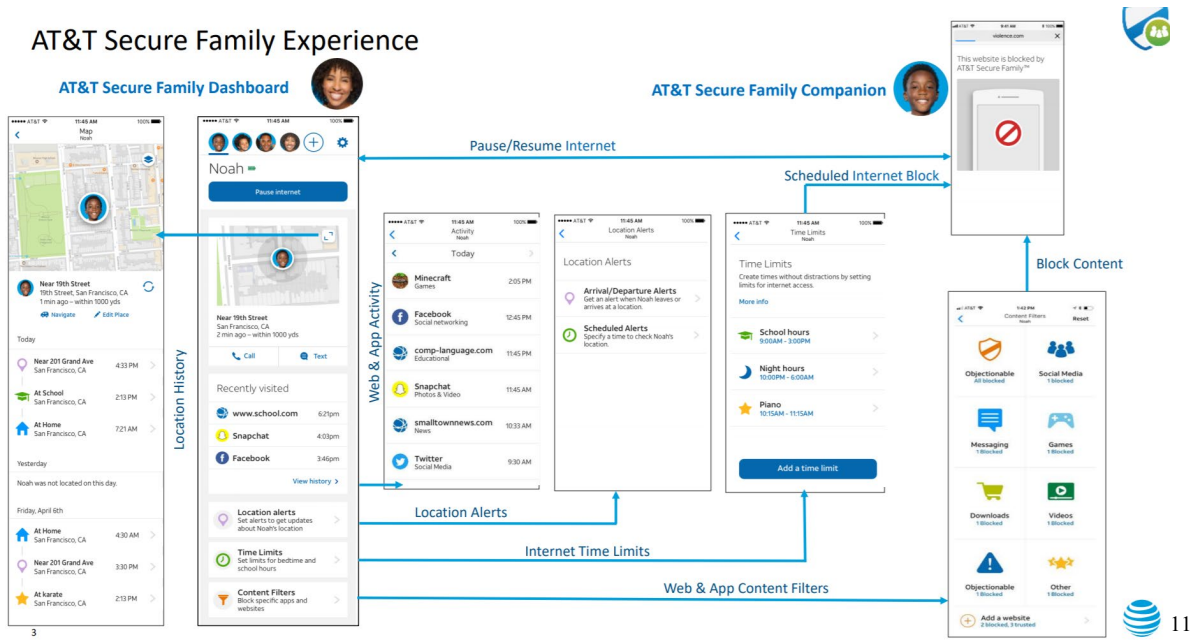
29. The Accused Products include functionalities that allow users to form and/or join networks or groups, share and view locations with other users, display symbols corresponding to locations (including locations of other users) on a map, and communicate with other users via text, voice, and multimedia-based communication. 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 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 AT&T’s position in the market.

30. For example, the Secure Family Application and the Companion Application (collectively “Secure Family”) enable family member devices to form location sharing groups. Secure Family includes a map on each device’s display (*e.g.*, a touchscreen display), and generates symbols corresponding with the locations of family member devices, as shown below.¹⁰ Family members may call, message, and communicate with other family member devices. Family member devices may further remotely control one another, such as by limiting access to certain websites, to block communication with certain contacts, to pause internet access, and/or to cause

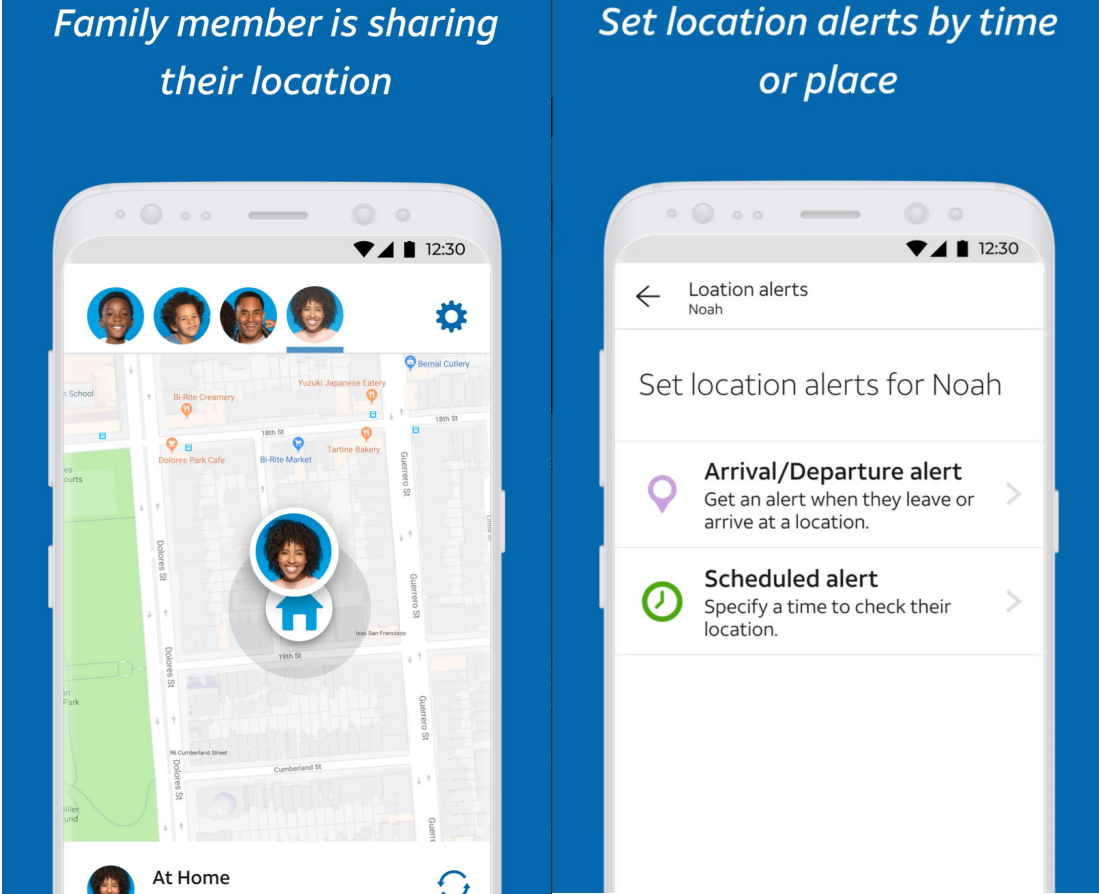
⁹ https://www.business.att.com/products/workforce-manager.html?source=EBBZ0000000000aBU&wtExtndSource=vanityWiFi&LNS=VN_MB_WM_WorkforceManager_0719

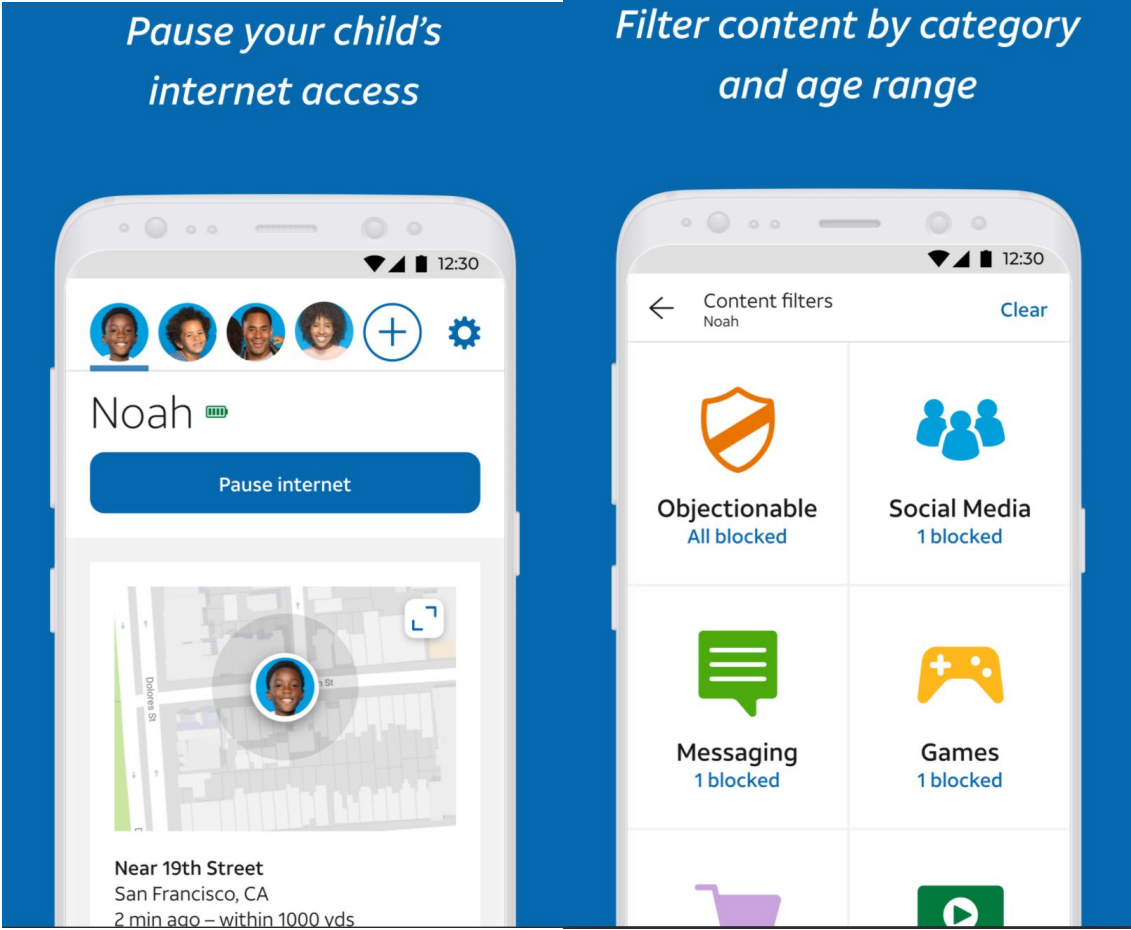
¹⁰ See <https://www.att.com/support/article/wireless/KM1271913/>;
<https://www.att.com/support/article/wireless/KM1299008/>

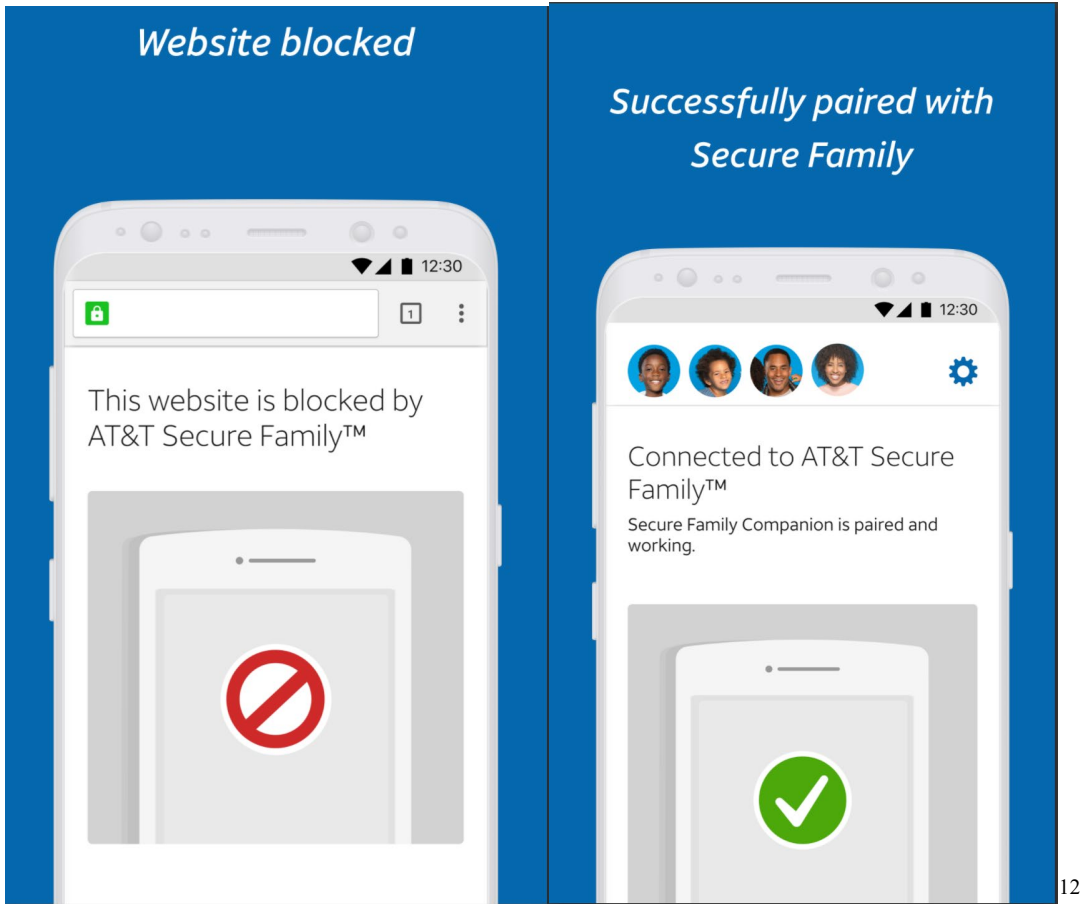
a device to report its location at regular intervals. Family member devices may be added or invited to a group based on a link sent via email and/or SMS.



¹¹ <https://www.att.com/ecms/dam/att/consumer/help/pdf/Secure-Family-Index-of-Support-Documentation.pdf>







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31. For example, AT&T Fleet Complete, AT&T Fleet Tracker system, and AT&T Fleet Complete allow users to view the location of any tracked user or vehicle (*e.g.* with a GPS tracking system), updated every 2 minutes.¹³ Users may view a map which generates symbols corresponding with the location of tracked users or vehicles, and may receive SMS alerts and/or email notifications for violation events.¹⁴ AT&T fleet tracking may be accessed via a mobile device, including through an application and/or web portal. Users may further create new map symbols (*e.g.* designated areas) which may remotely control vehicles that enter the area (*e.g.* to

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https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;

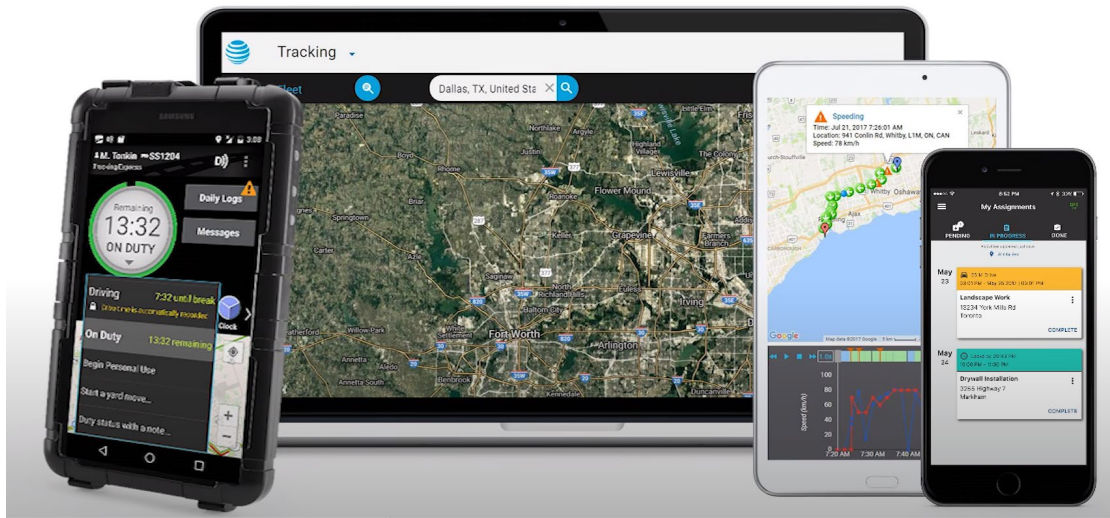
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

¹³ <https://www.business.att.com/products/fleet-tracker.html>

¹⁴ *Id.*

report a status). AT&T Fleet Tracking further comprises an application on a mobile device of a tracked user or vehicle and/or an MGS800 fleet tracking device.¹⁵ For example, users “may mount their smartphone or tablet inside the vehicle and use the mobile app available for Android.”¹⁶

AT&T Fleet Complete

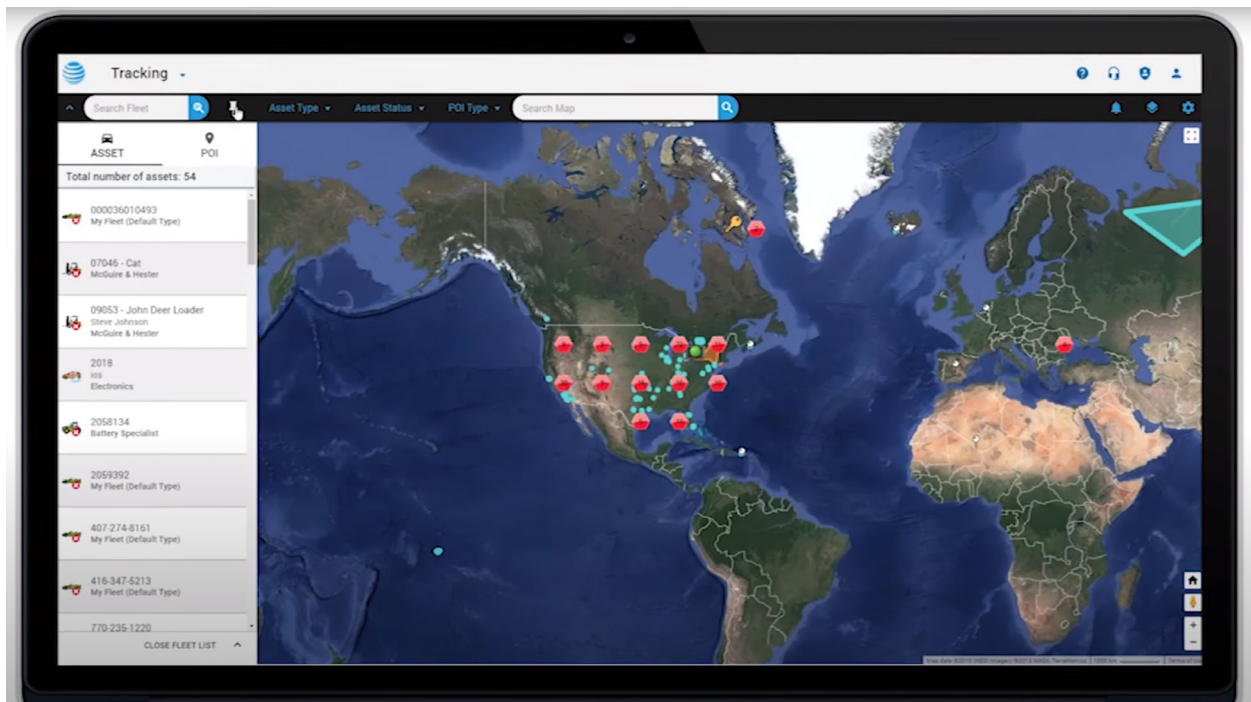


¹⁵ https://about.att.com/newsroom/2018/fleet_management_video_analytics.html; *see also* <https://www.bestellddevices.com/att-fleet-complete-review/>

¹⁶ *Id.*; *see also* <https://www.youtube.com/watch?v=mnbEoLKEFMI>



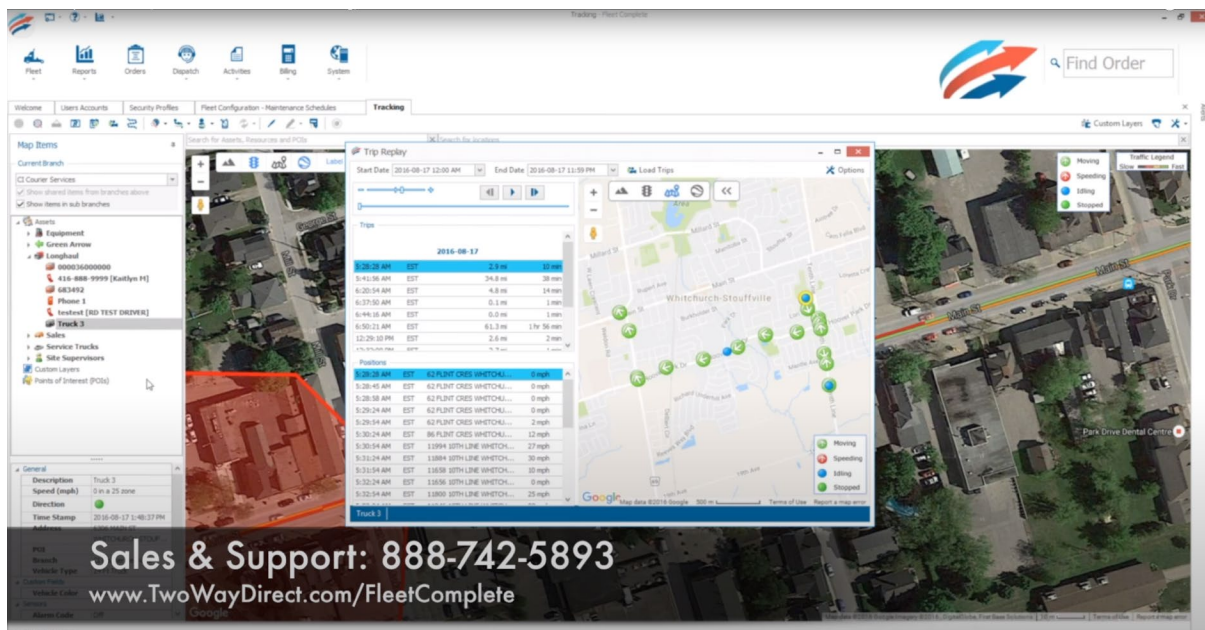
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¹⁷ <https://www.bestellddevices.com/att-fleet-complete-review/>

¹⁸ <https://www.youtube.com/watch?v=L4GJBMceDN0&t=105s>



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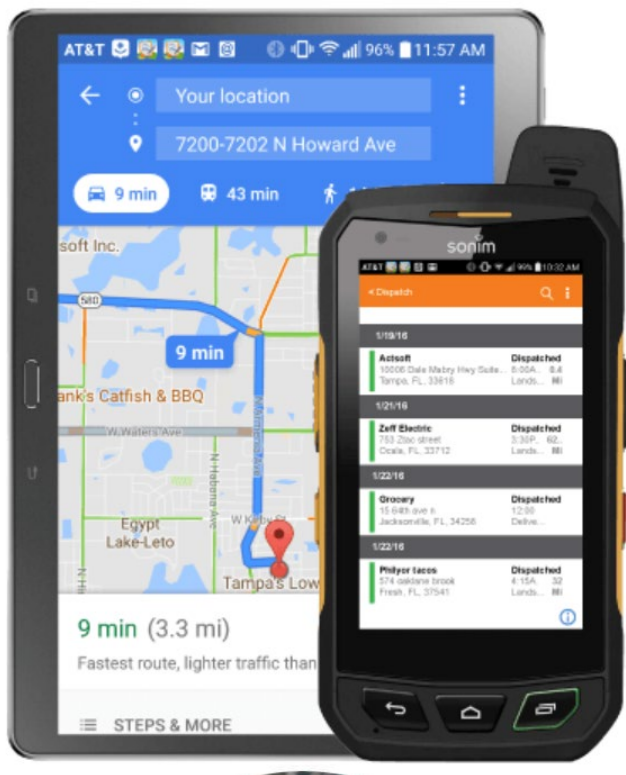
32. For example, AT&T Workforce Manager provides location tracking functionality of users through cellular devices and/or PDAs.²⁰ Workforce Manager is a “cloud-based, all-in-one [] software for managing employees, vehicles, and assets” that allows users to “make individual or group calls from within the Workforce Manager Application, view employees current locations, and more.”²¹ Workforce Manager allows users to manage job dispatching and set up geofencing and event-based location tracking in order to remotely monitor users’ locations and activities, “illustrat[ing] a breadcrumb trail, displaying where the user has been” throughout the day.²²

¹⁹ <https://www.youtube.com/watch?v=3boL--1RWKM>

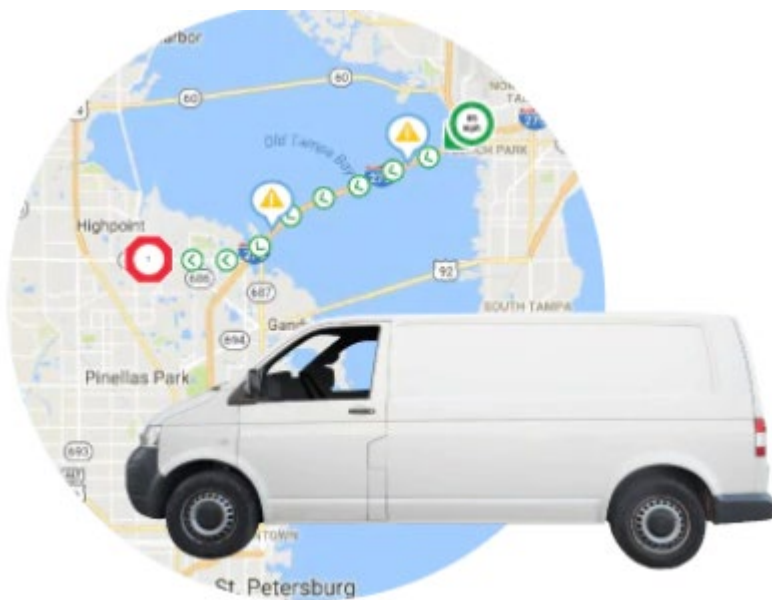
²⁰ https://www.business.att.com/products/workforce-manager.html?source=EBBZ0000000000aBU&wtExtndSource=vanityWiFi&LNS=VN_MB_WM_WorkforceManager_0719

²¹ *Id.*; see also <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>; <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>; <https://www.business.att.com/content/dam/attbusiness/briefs/workforce-manager-product-brief.pdf>

²² https://www.business.att.com/products/workforce-manager.html?source=EBBZ0000000000aBU&wtExtndSource=vanityWiFi&LNS=VN_MB_WM_WorkforceManager_0719



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²³ *Id.*

²⁴ *Id.*

33. The Workforce Manager Application can be installed on users' smartphones and/or tablets via Google Play and the Apple App store.²⁵ There is no limit to the number of users (*e.g.* employees) that can be tracked.²⁶ In addition to location tracking functionality, Workforce manager includes "push-to-talk" functionality that is "[c]ompatible with a wide array of handsets and tablet devices."²⁷ For example, "AT&T Workforce Manager Voice Dispatch combines the communication capabilities of AT&T Enhanced Push-to-Talk with precision-based intelligent tracking."²⁸ Upon information and belief, Workforce Manager transmits voice data via internet protocol.

34. Workforce Manager further comprises an interactive display, and presents symbols corresponding with the locations of other user devices (*e.g.* employees).²⁹ Upon information and belief, Workforce Manager uses both device and server-based databases for location data corresponding with displayed symbols. Upon information and belief, Workforce Manager further comprises distinct servers for map data (*e.g.* tile data) and for location data (*e.g.* longitude and latitude of employee devices).

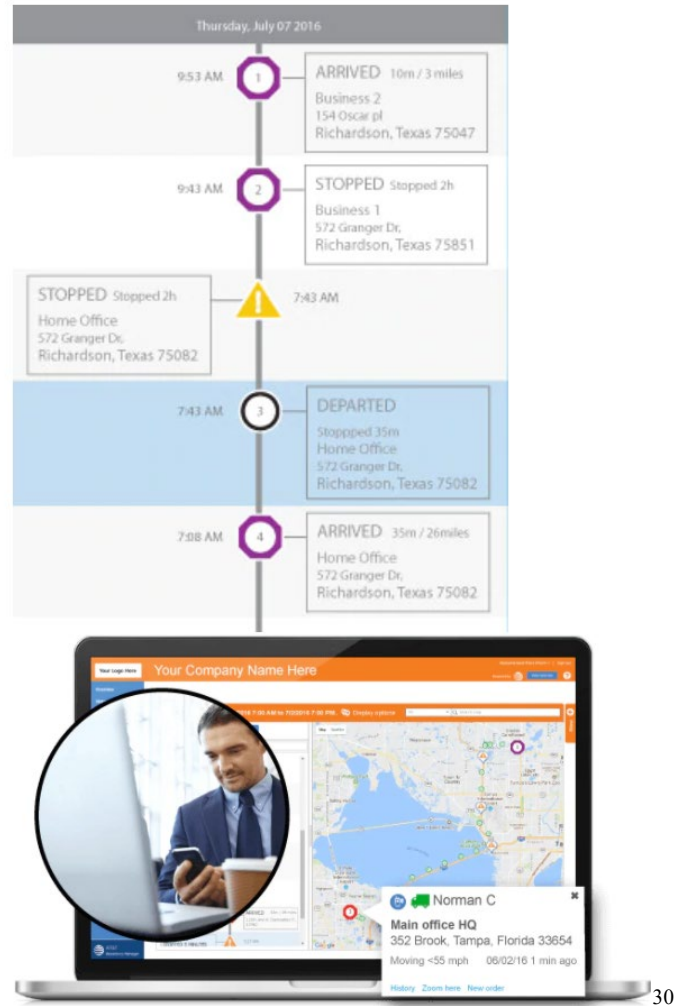
²⁵ https://www.business.att.com/products/workforce-manager.html?source=EBBZ000000000aBU&wtExtndSource=vanityWiFi&LNS=VN_MB_WM_WorkforceManager_0719; *see also* <https://apps.apple.com/us/app/at-t-workforce-manager/id986304516>

²⁶ *Id.*

²⁷ <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>

²⁸ *Id.*

²⁹ *See e.g.* <https://www.twowaydirect.com/att-workforce-manager-with-enhanced-push-to-talk/>



COUNT I
(Infringement of the '970 Patent)

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

36. AGIS Software has not licensed or otherwise authorized AT&T 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.

³⁰ <https://www.twowaydirect.com/att-workforce-manager-with-enhanced-push-to-talk/>

37. AT&T 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.

38. AT&T 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).

39. AT&T 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, AT&T, 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).

40. For example, AT&T has indirectly infringed and continues to indirectly infringe at least claim 10 of the '970 Patent in the United States because AT&T's customers use the Accused Products, including at least AT&T Secure Family, AT&T Fleet Complete, AT&T Fleet Tracker system, and AT&T Workforce Manager, alone and in conjunction with additional Accused Products and/or services, in accordance with AT&T's instructions and thereby directly infringe at least claim 10 of the '970 Patent in violation of 35 U.S.C. § 271. AT&T 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.att.com/support/article/wireless/KM1271913/>;

<https://www.att.com/support/article/wireless/KM1299008/>;

<https://www.youtube.com/watch?v=L4GJBMceDN0&t=105s>;

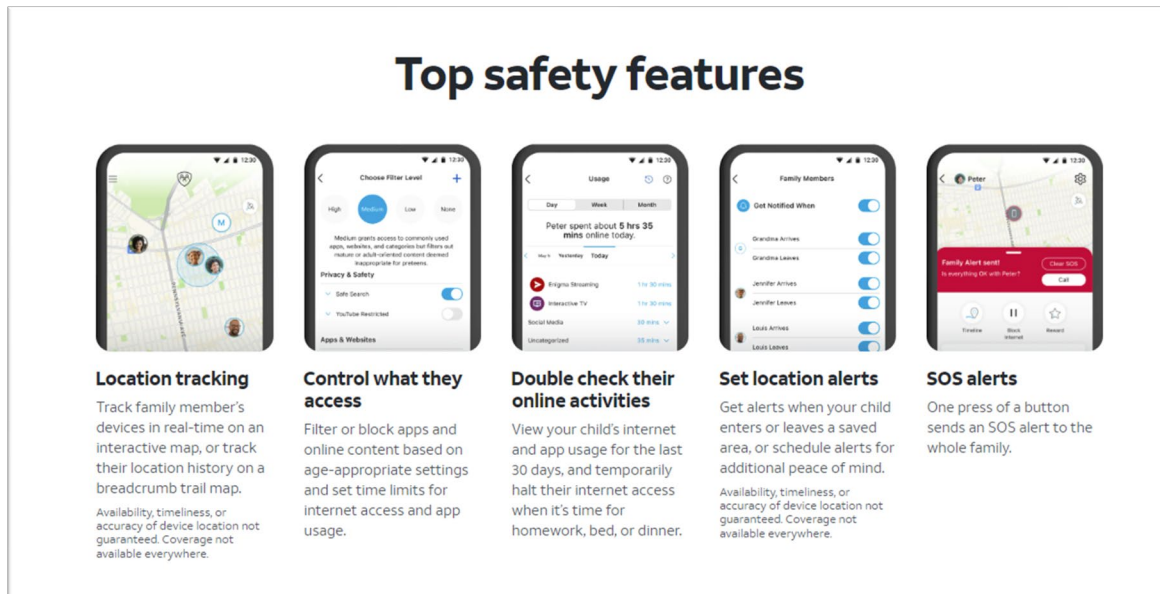
<https://www.att.com/security/secure-family-app/>; <https://screenready.att.com/digital-parenting/>;

<https://www.att.com/support/article/wireless/KM1271913/>; and AT&T agents and representatives

located within this Judicial District. AT&T is thereby liable for infringement of the '970 Patent under 35 U.S.C. § 271(b).

41. For example, AT&T 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 show 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.



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³¹ <https://www.att.com/security/secure-family-app/>

Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
- **Save a place:** Save frequently visited places on a map like work, school, child's friend's house.
- **Alert options:** Set scheduled or arrival and departure alerts to keep up with your child's location.
- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

[Learn more about internet control features](#)

32

Notifications and usage info

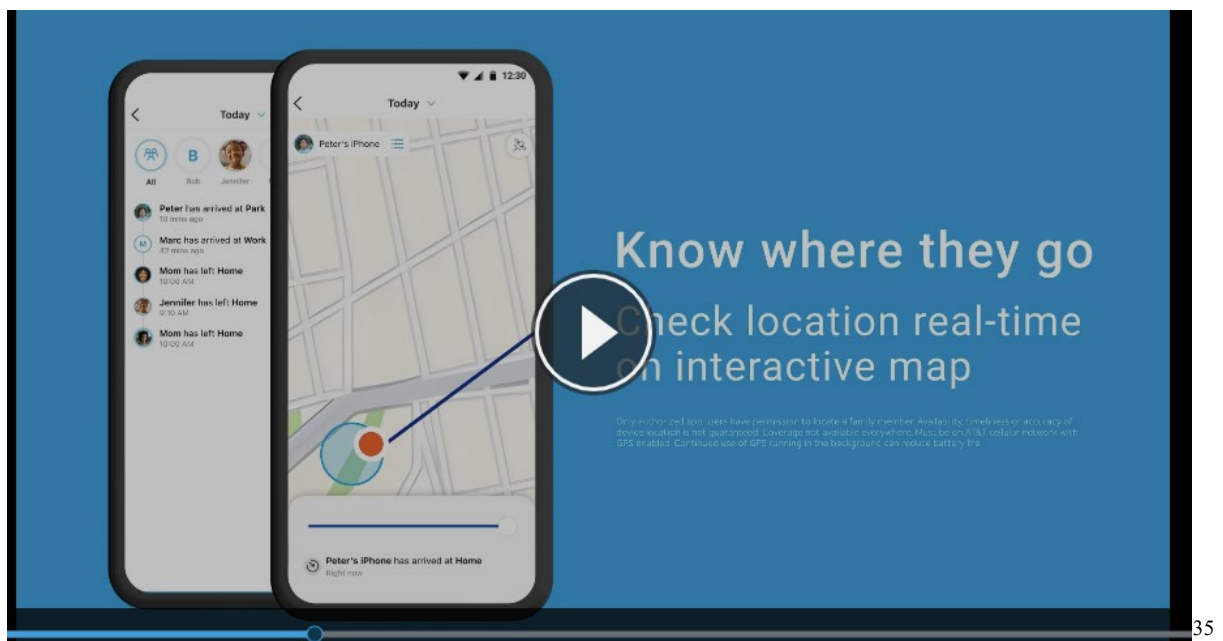
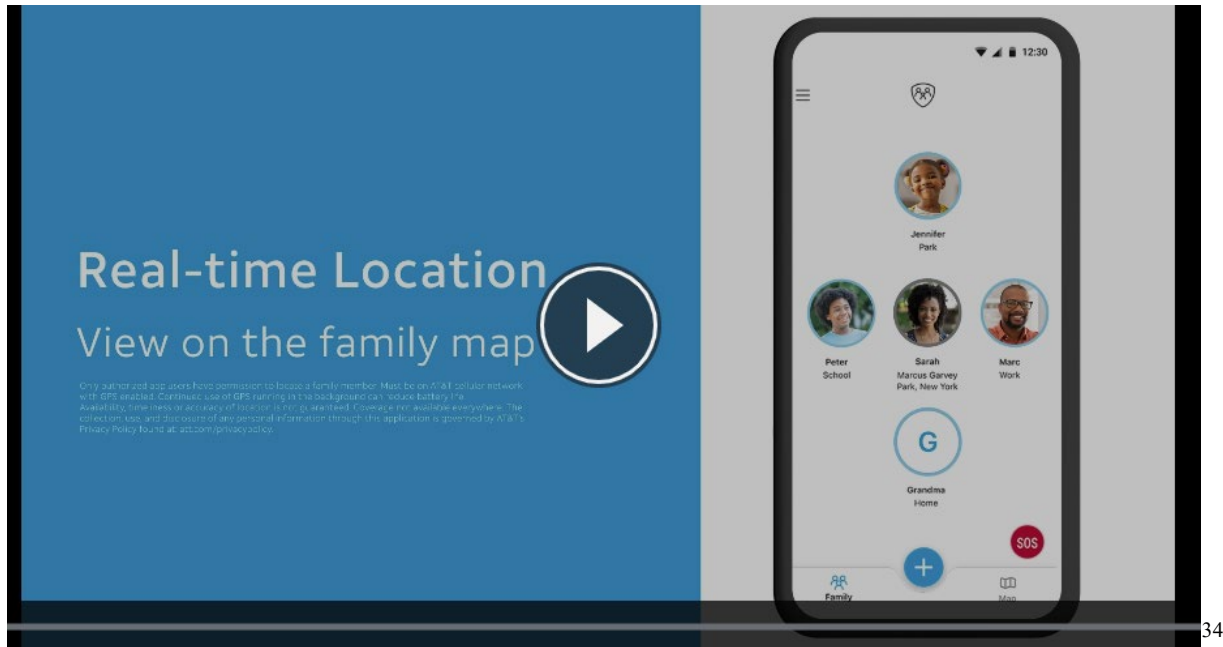
- **SOS Alert:** Have all family members notified if a child needs help.
- **Tamper alert:** Get an in-app notification or text if your child tries to turn off location permissions or disable the Secure Family Companion app.
- **Battery status:** See the status of your child's phone battery so you know when it's running low, and receive an alert when it drops below 15%.
- **Lost phone ring:** Have a lost phone ring for up to two minutes to help locate it.

[Review the Secure Family FAQ \(PDF, 263KB\)](#)

33

³² <https://www.att.com/support/article/wireless/KM1271913>.

³³ <https://www.att.com/support/article/wireless/KM1271913>.



42. The Accused Products, such as AT&T Fleet Tracker, AT&T Workforce Manage, AT&T FirstNet, AT&T FirstNet Messaging, AT&T FirstNet Push-to-Talk, AT&T Enhanced PTT,

³⁴ <https://www.att.com/security/secure-family-app/>.

³⁵ <https://www.att.com/security/secure-family-app/>.

AT&T FirstNet Rapid Response, and AT&T amiGO, further include similar features and functionality to Secure Family, and infringe in a substantially similar manner.³⁶

The bottom line

- AT&T Fleet Complete uses advanced GPS to track vehicles and assets in near real-time, allowing fleet managers to increase the efficiency and productivity of their fleets.
- This gives companies the visibility and control they need to reduce fuel and insurance costs, improve customer satisfaction and retention, lower maintenance expenses, prevent unauthorized vehicle use, decrease the carbon footprint of the fleet, and stay in compliance of industry and government regulations.
- AT&T Fleet Complete customers report a Return on Investment after only two to five months—making it easy to make the decision to roll out a fleet tracking, management, and logistics solution today.







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³⁶ See e.g. www.att.com/workforcemanager; <https://www.twowaydirect.com/att-workforce-manager-with-enhanced-push-to-talk/>; <https://www.business.att.com/content/dam/attbusiness/briefs/workforce-manager-product-brief.pdf>; <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>; <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>; <https://apps.apple.com/us/app/at-t-workforce-manager/id986304516>; https://about.att.com/newsroom/2018/fleet_management_video_analytics.html; <https://asecare.att.com/product/att-fleet-management-enterprise-government/>; <https://asecare.att.com/tutorials/view-breadcrumb-trail-att-fleet-management-enterprise-government/?product=AT&T%20Fleet%20Management%20for%20Enterprise/Government>; <https://www.youtube.com/watch?v=3boL--1RWKM>

³⁷ <https://www.business.att.com/resources/knowledge-center/how-fleet-tracking-can-optimize-business.html>.

AT&T Fleet Complete features

Save time with one platform that does it all

 Location tracking & route replay	 Vehicle health reports & analytics	 Driver behavior & safety scorecard
 AI-powered video telematics	 Electronic Logging Device compliance	 Customizable web & mobile dashboards

38

³⁸ <https://www.business.att.com/products/fleet-complete.html>.

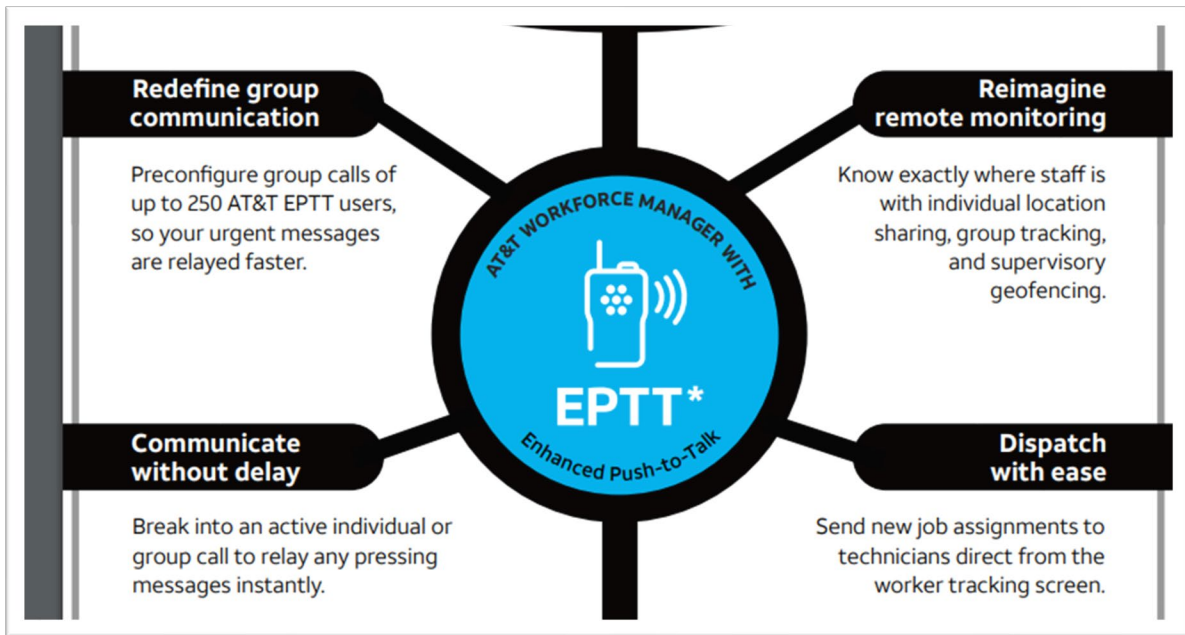
Mobile assets

As business owners, you should always have clarity and understanding when it comes to the assets and tools that power your operations. By allowing you to monitor the status and locations of your high-value assets, AT&T Workforce Manager protects your business by giving you:

- Current location information for your high-value mobile assets
- Greater likelihood of retrieving stolen property more quickly
- Opportunities to react quickly after receiving notices of an asset's status changes
- Theft and recovery supports, activity alerts, GPS tracking, geofencing, and the ability to create ad hoc reports

The solution uses intuitive and user-friendly technology that can help you curb losses and increase your peace of mind.

39



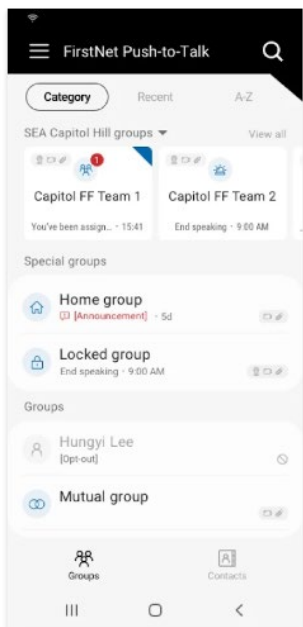
40

³⁹ <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>.

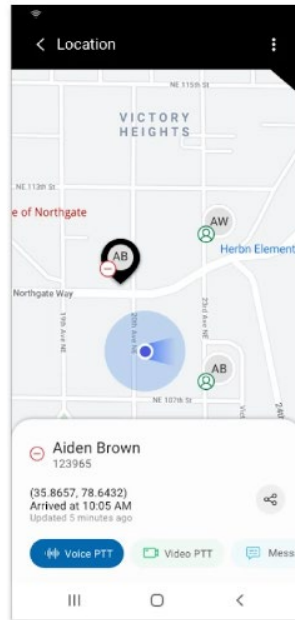
⁴⁰ <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>.

Create talk groups by referencing jurisdictional zones for group organization.

Locate team members and initiate PTT calls from a map interface



Note: All names are fictitious









Note: All names are fictitious

41

Benefits

Supporting first responder communications

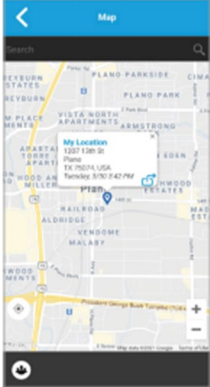
<p> Geofence group creation Dynamic groups creation using a geofence with a radius you determine</p>	<p> Communicate more Attach files, photos, and videos up to 100MB each and voice memos up to 10 minutes</p>
<p> Visibility Rest easy knowing your messaging was received with confirmations for sent, delivered, and even read messages</p>	<p> Technical help With our trained technical support on standby 24/7, you can rest easy knowing you'll have the help when you need it</p>
<p> Federated contacts Easily share or import contacts from other agencies</p>	<p> Compatibility Messaging service works with major U.S. carriers and is also compatible with any device with text message capabilities</p>

42

⁴¹ <https://play.google.com/store/apps/details?id=com.att.firstnet.grey>.

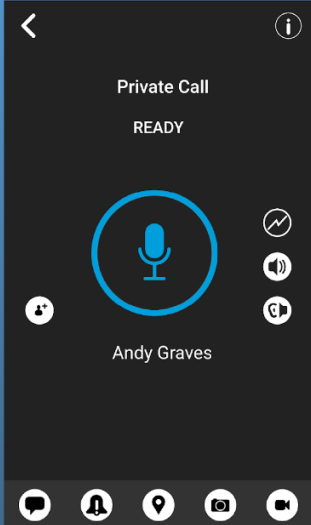
⁴² <https://www.firstnet.com/apps/featured-apps/firstnet-messaging.html>.

- Individuals
 - Sending My Location or an Arbitrary Location to a Contact
 - Sending My Location or an Arbitrary Location to a Quick Group
 - Sending My Location or an Arbitrary Location to a Talkgroup
- Supervisor with Location Capability
 - Talkgroup Member Location
 - Boundary
 - Creating a Quick Group from the Map



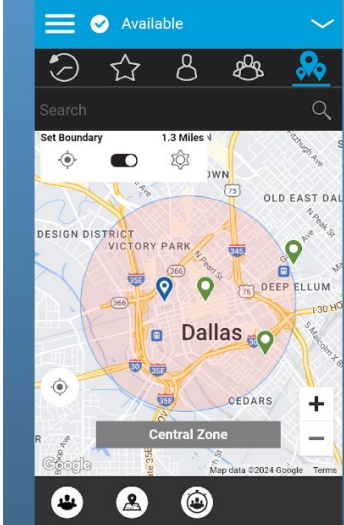
43

Talk or send secure text and media to a group or one person.



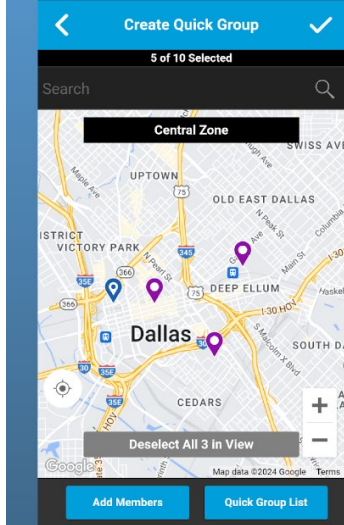
Private Call
READY
Andy Graves

Share your location and geofence group members you supervise.



Available
Set Boundary 1.3 Miles
Dallas
Central Zone

Make a group call to those that you select on the map.

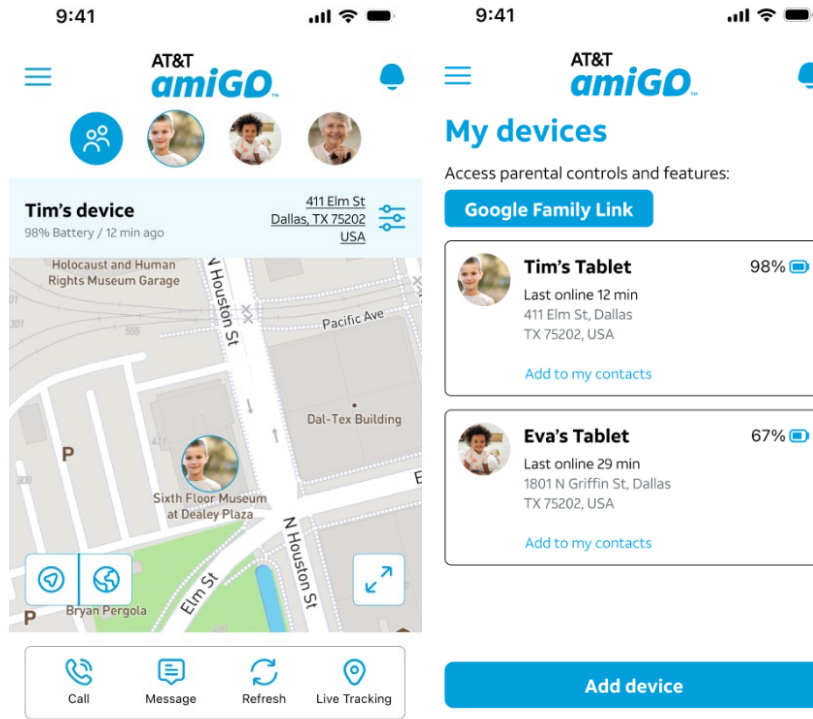


Create Quick Group
5 of 10 Selected
Search
Central Zone
Deselect All 3 In View
Add Members Quick Group List

44

⁴³ <https://www.firstnet.com/content/dam/firstnet/white-papers/firstnet-rapid-response-ptt-android-app-user-guide.pdf>.

⁴⁴ <https://play.google.com/store/apps/details?id=com.att.eptt>.



45

43. AGIS Software has suffered damages as a result of AT&T’s direct and indirect infringement of the ’970 Patent in an amount to be proved at trial.

44. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of AT&T’s infringement of the ’970 Patent for which there is no adequate remedy at law, unless AT&T’s infringement is enjoined by this Court.

COUNT II
(Infringement of the ’251 Patent)

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

46. AGIS Software has not licensed or otherwise authorized AT&T 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.

⁴⁵ <https://play.google.com/store/apps/details?id=com.att.amigoapp>.

47. AT&T 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.

48. AT&T 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).

49. AT&T 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, AT&T, 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.

50. For example, AT&T has indirectly infringed and continues to indirectly infringe at least claim 24 of the '251 Patent in the United States because AT&T's customers use the Accused Products, including at least AT&T Secure Family, AT&T Fleet Complete, AT&T Fleet Tracker system, and AT&T Workforce Manager, alone or in conjunction with additional Accused Products, in accordance with AT&T's instructions and thereby directly infringe at least one claim of the '251 Patent in violation of 35 U.S.C. § 271. AT&T 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.att.com/support/article/wireless/KM1271913/>;

<https://www.att.com/support/article/wireless/KM1299008/>;

<https://www.youtube.com/watch?v=L4GJBMceDN0&t=105s>;

<https://www.att.com/security/secure-family-app/>; <https://screenready.att.com/digital-parenting/>;

<https://www.att.com/support/article/wireless/KM1271913> and AT&T agents and representatives

located within this Judicial District. AT&T is thereby liable for infringement of the '251 Patent under 35 U.S.C. § 271(b).

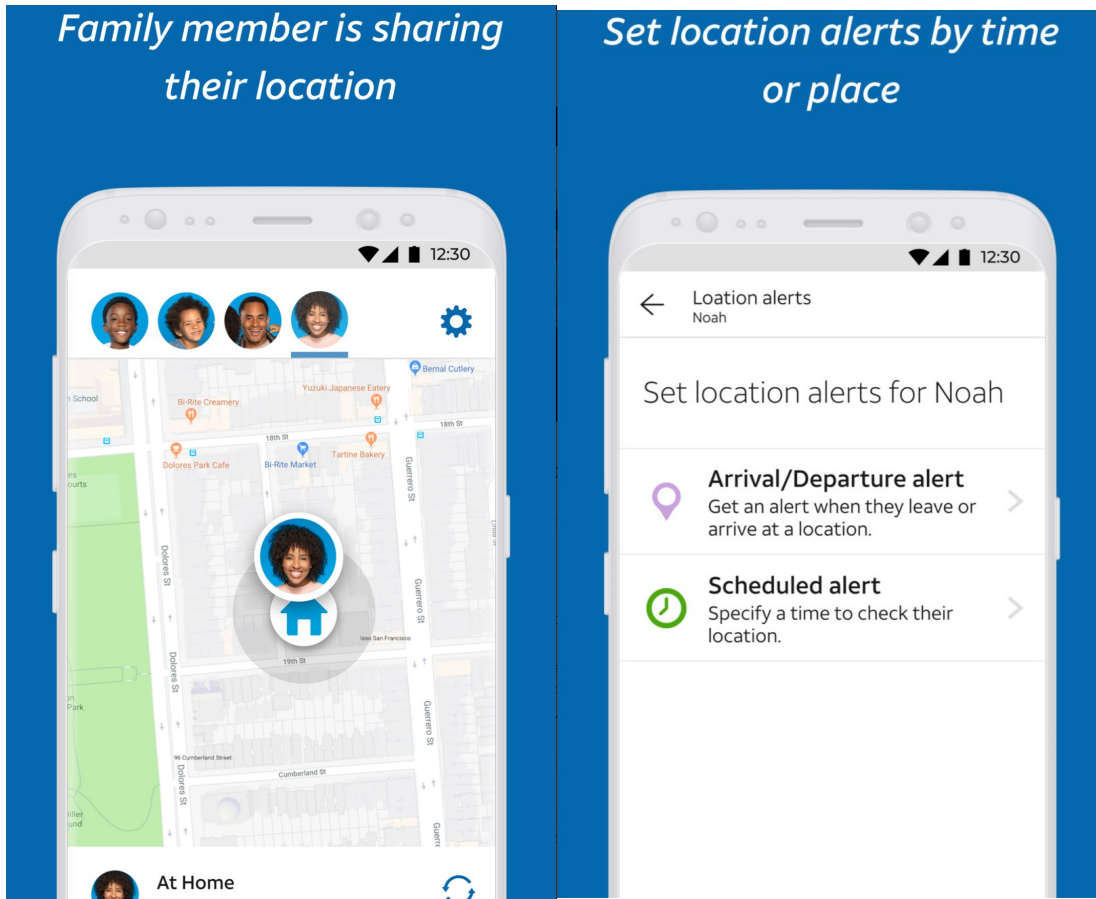
51. The Secure Family Applications directly and indirectly infringe at least claim 24 of the '251 Patent by comprising a system of a first device programmed to perform operations comprising: receiving a message from a second device, wherein the message relates to joining a group; based on receiving the message from the second device, participating in the group, wherein participating in the group includes sending first location information to a server and receiving second location information from the server, the first location information comprising a location of the first device, the second location information comprising a plurality of locations of a respective plurality of second devices included in the group; presenting, via an interactive display of the first device, a first interactive, georeferenced map and a plurality of user-selectable symbols corresponding to the plurality of second devices, wherein the symbols are positioned on the first georeferenced map at respective positions corresponding to the locations of the second devices, and wherein the first georeferenced map includes data relating positions on the first georeferenced map to spatial coordinates; sending, from the first device to the server, a request for a second georeferenced map different from the first georeferenced map, wherein the request specifies a map location; receiving, from the server, the second georeferenced map, wherein the second

georeferenced map includes the requested location and data relating positions on the second georeferenced map to spatial coordinates; presenting, via the interactive display of the first device, the second georeferenced map and the plurality of user-selectable symbols corresponding to the plurality of second devices, wherein the symbols are positioned on the second georeferenced map at respective positions corresponding to the locations of the second devices; and identifying user interaction with the interactive display selecting one or more of the user-selectable symbols corresponding to one or more of the second devices and positioned on the second georeferenced map and user interaction with the display specifying an action and, based thereon, using an Internet Protocol to send data to the one or more second devices via the server, wherein the first device does not have access to respective Internet Protocol addresses of the second devices.

52. For example, Family Secure allows users to share their locations and view other users' locations on a map and to communicate with those users via the Family Secure App.

53. For example, Family Secure allows users to establish groups (*e.g.*, of family members), and to exchange messages and calls via SMS, and/or via interaction with AT&T's servers which provide the Family Secure services, among other relevant services. The exemplary Accused Products further allow users to retrieve map information from multiple sources, including street-view maps.

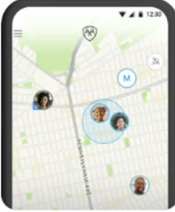
54. The exemplary Accused Products are programmed to receive messages from other devices where those messages relate to joining groups, as depicted below:



46

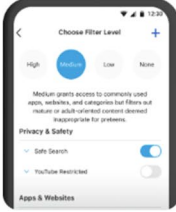
https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

Top safety features

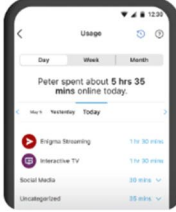


Location tracking
Track family member's devices in real-time on an interactive map, or track their location history on a breadcrumb trail map.

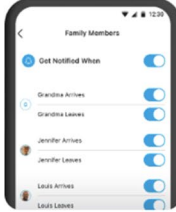
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



Control what they access
Filter or block apps and online content based on age-appropriate settings and set time limits for internet access and app usage.

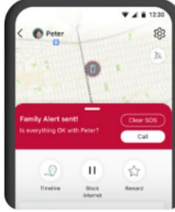


Double check their online activities
View your child's internet and app usage for the last 30 days, and temporarily halt their internet access when it's time for homework, bed, or dinner.



Set location alerts
Get alerts when your child enters or leaves a saved area, or schedule alerts for additional peace of mind.

Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



SOS alerts
One press of a button sends an SOS alert to the whole family.

47

It's easy to get started

1

Sign up and download

Enroll in Secure Family and connect up to 30 devices per Secure Family account.

2

Set up your family profiles

Add your phone numbers to your Secure Family profile.

[View setup guide >](#)

3

Invite your family to the hub

Install and pair the Secure Family companion app on your kids' devices.

48

⁴⁷ <https://www.att.com/security/secure-family-app/>.

⁴⁸ <https://www.att.com/security/secure-family-app/>.

Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
- **Save a place:** Save frequently visited places on a map like work, school, child's friend's house.
- **Alert options:** Set scheduled or arrival and departure alerts to keep up with your child's location.
- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

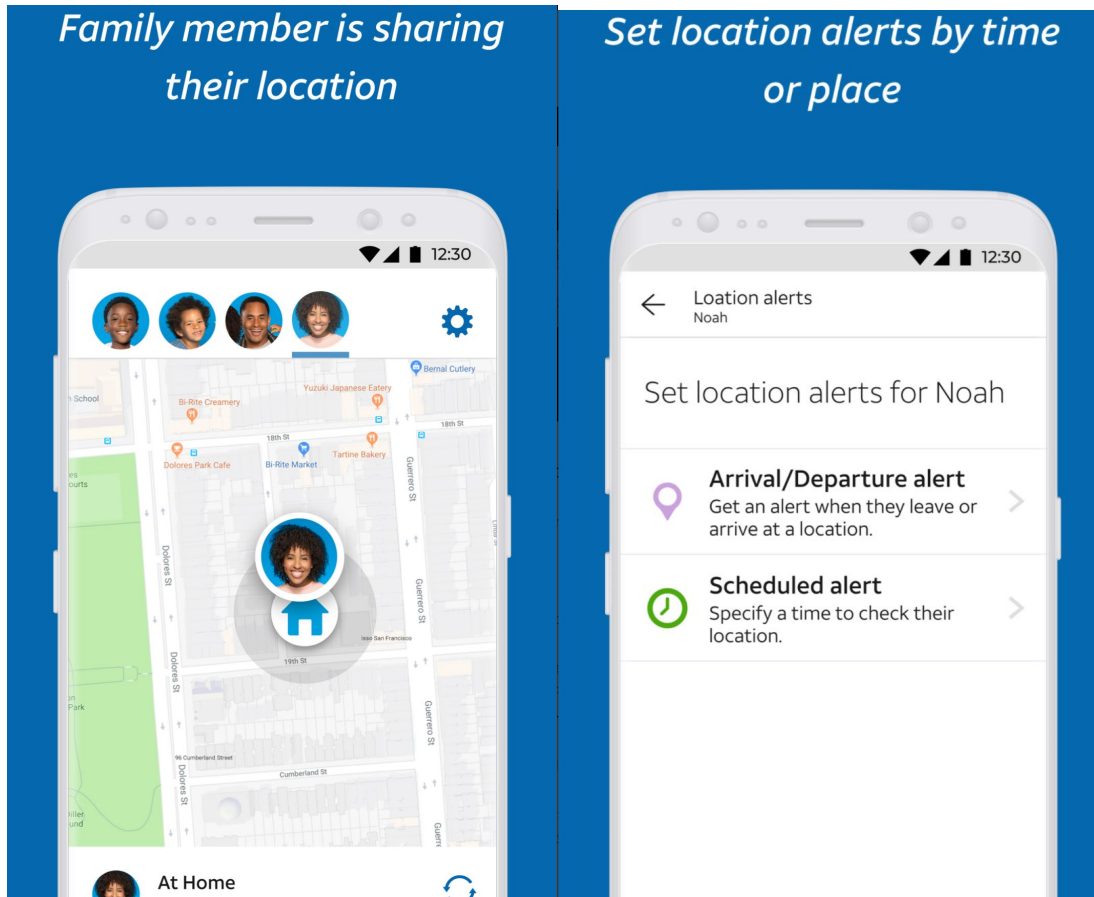
- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

[Learn more about internet control features](#)

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55. 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:

⁴⁹ <https://www.att.com/support/article/wireless/KM1271913>.

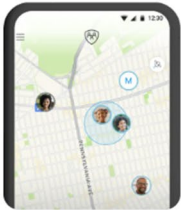


50

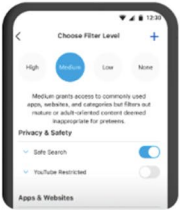
50

https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

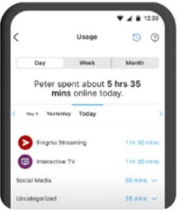
Top safety features



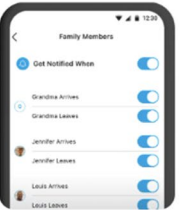
Location tracking
Track family member's devices in real-time on an interactive map, or track their location history on a breadcrumb trail map.
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



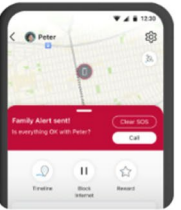
Control what they access
Filter or block apps and online content based on age-appropriate settings and set time limits for internet access and app usage.



Double check their online activities
View your child's internet and app usage for the last 30 days, and temporarily halt their internet access when it's time for homework, bed, or dinner.



Set location alerts
Get alerts when your child enters or leaves a saved area, or schedule alerts for additional peace of mind.
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



SOS alerts
One press of a button sends an SOS alert to the whole family.

51

Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
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- **Alert options:** Set scheduled or arrival and departure alerts to keep up with your child's location.
- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

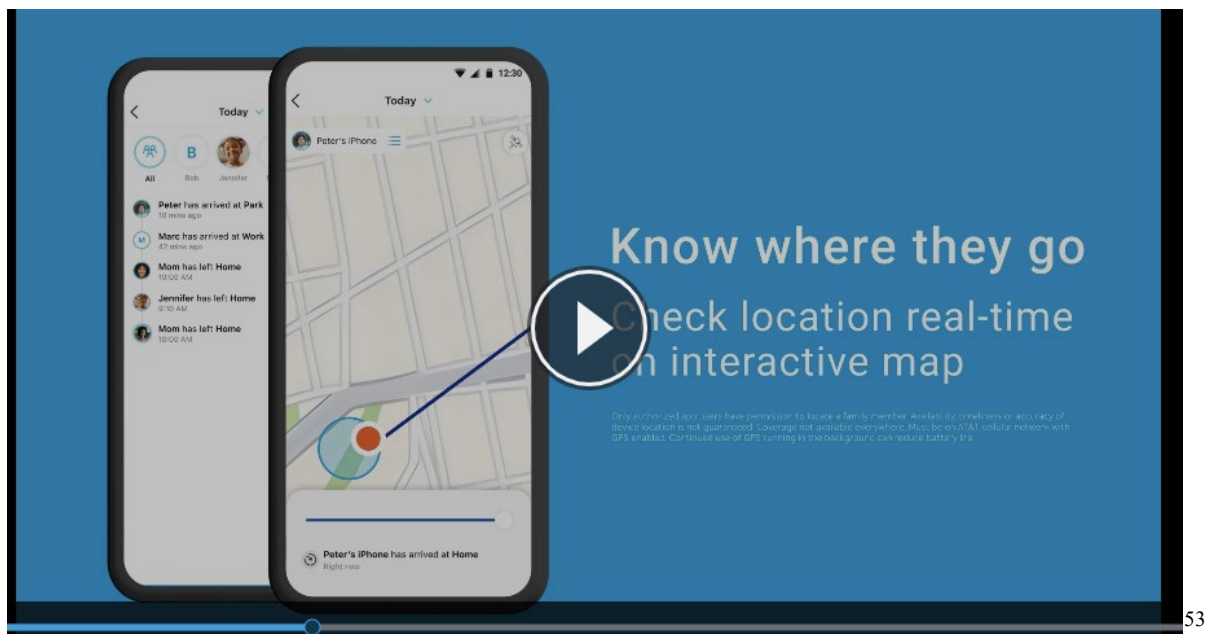
- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

[Learn more about internet control features](#)

52

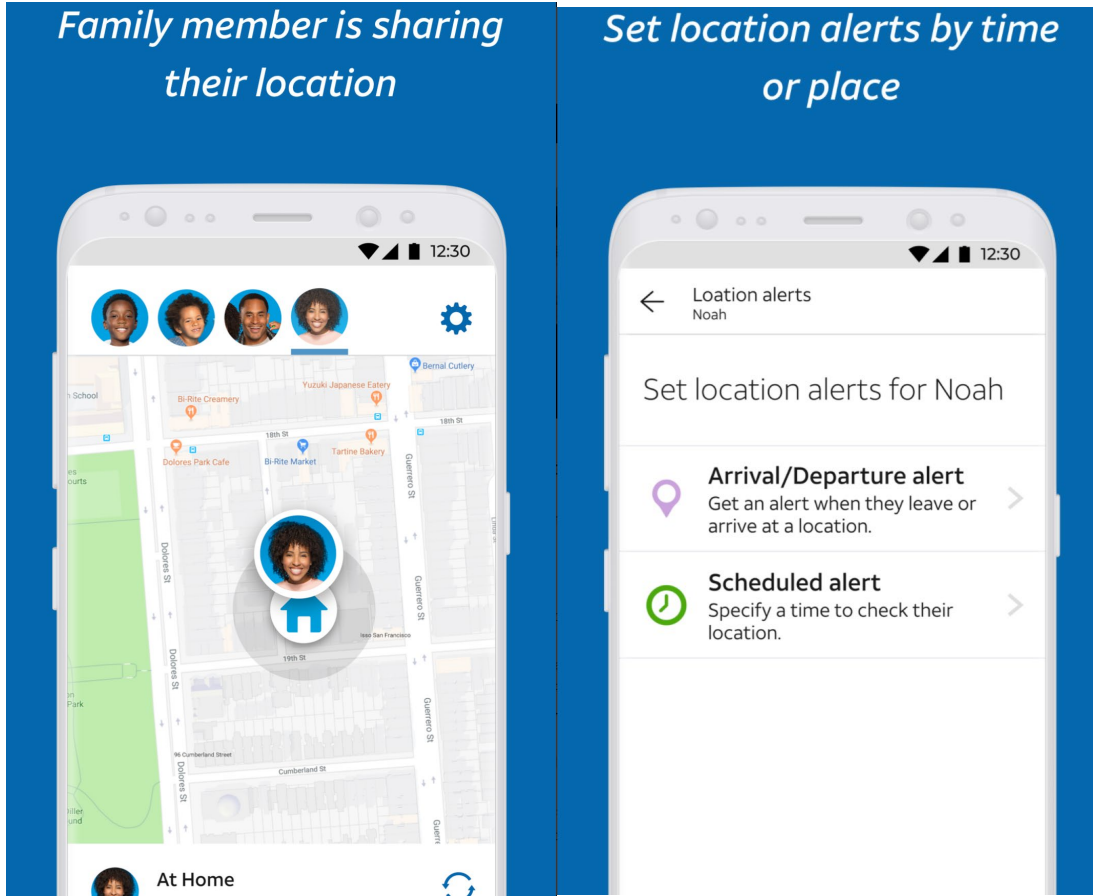
⁵¹ <https://www.att.com/security/secure-family-app/>.

⁵² <https://www.att.com/support/article/wireless/KM1271913>.



56. 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:

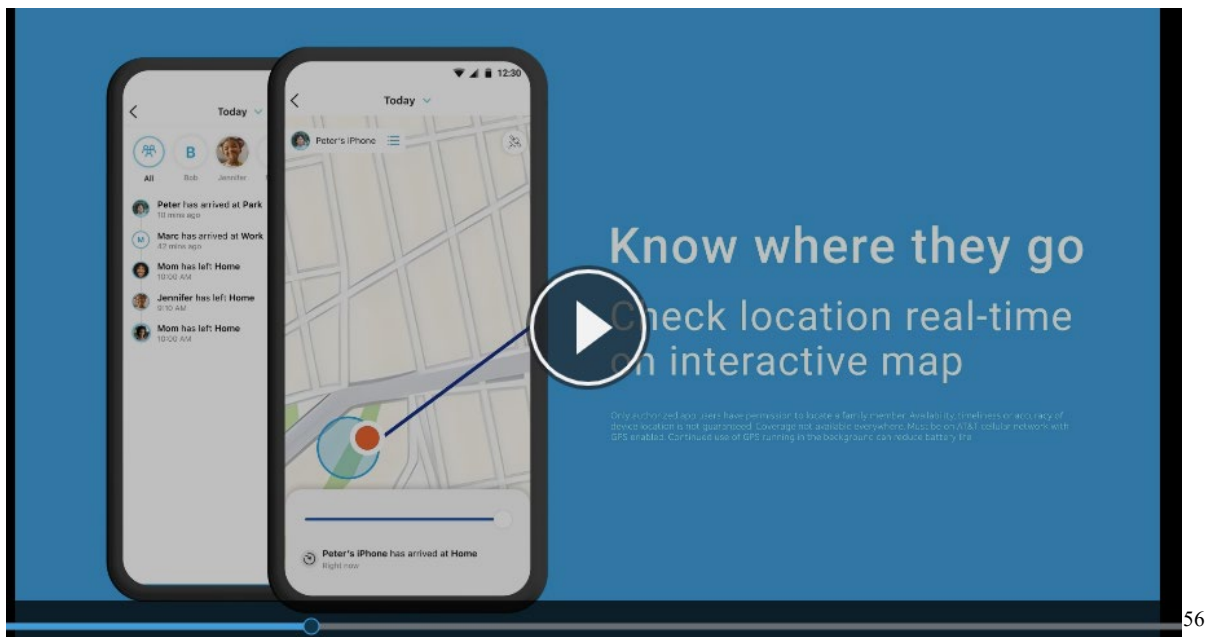
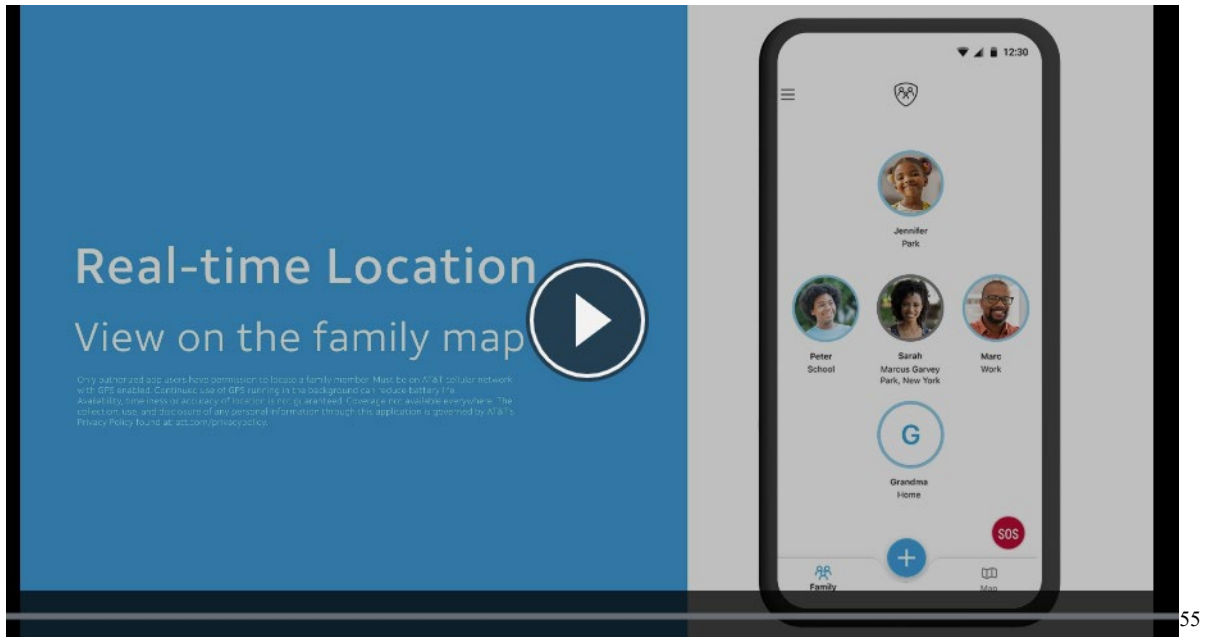
⁵³ <https://www.att.com/security/secure-family-app/>.



54

54

https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US



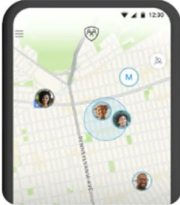
57. For example, the Family Secure Applications, are programmed to permit users to request and display additional maps by, for example, moving the map screen and/or by selecting satellite image maps. The exemplary Accused Products are further programmed to permit

⁵⁵ <https://www.att.com/security/secure-family-app/>.

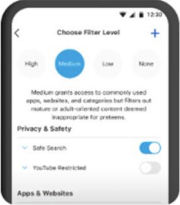
⁵⁶ <https://www.att.com/security/secure-family-app/>.

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.

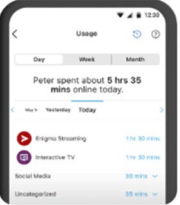
Top safety features



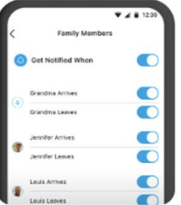
Location tracking
Track family member's devices in real-time on an interactive map, or track their location history on a breadcrumb trail map.
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



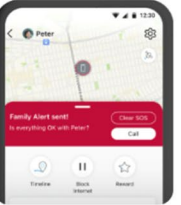
Control what they access
Filter or block apps and online content based on age-appropriate settings and set time limits for internet access and app usage.



Double check their online activities
View your child's internet and app usage for the last 30 days, and temporarily halt their internet access when it's time for homework, bed, or dinner.



Set location alerts
Get alerts when your child enters or leaves a saved area, or schedule alerts for additional peace of mind.
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



SOS alerts
One press of a button sends an SOS alert to the whole family.

57

Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
- **Save a place:** Save frequently visited places on a map like work, school, child's friend's house.
- **Alert options:** Set scheduled or arrival and departure alerts to keep up with your child's location.
- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

[Learn more about internet control features](#)

58

⁵⁷ <https://www.att.com/security/secure-family-app/>.

⁵⁸ <https://www.att.com/support/article/wireless/KM1271913>.



59

58. The Accused Products, such as AT&T FirstNet, AT&T FirstNet Messaging, AT&T FirstNet Push-to-Talk, AT&T Enhanced PTT, AT&T FirstNet Rapid Response, and AT&T amiGO further include similar features and functionality to Secure Family, and infringe in a substantially similar manner.⁶⁰

⁵⁹ <https://www.att.com/security/secure-family-app/>.

⁶⁰ See e.g. www.att.com/workforcemanager; <https://www.twowaydirect.com/att-workforce-manager-with-enhanced-push-to-talk/>; <https://www.business.att.com/content/dam/attbusiness/briefs/workforce-manager-product-brief.pdf>; <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>; <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>; <https://apps.apple.com/us/app/at-t-workforce-manager/id986304516>; https://about.att.com/newsroom/2018/fleet_management_video_analytics.html; <https://asecare.att.com/product/att-fleet-management-enterprise-government/>; <https://asecare.att.com/tutorials/view-breadcrumb-trail-att-fleet-management-enterprise-government/?product=AT&T%20Fleet%20Management%20for%20Enterprise/Government>; <https://www.youtube.com/watch?v=3boL--1RWKM>

The bottom line

- AT&T Fleet Complete uses advanced GPS to track vehicles and assets in near real-time, allowing fleet managers to increase the efficiency and productivity of their fleets.
- This gives companies the visibility and control they need to reduce fuel and insurance costs, improve customer satisfaction and retention, lower maintenance expenses, prevent unauthorized vehicle use, decrease the carbon footprint of the fleet, and stay in compliance of industry and government regulations.
- AT&T Fleet Complete customers report a Return on Investment after only two to five months—making it easy to make the decision to roll out a fleet tracking, management, and logistics solution today.

61

AT&T Fleet Complete features

Save time with one platform that does it all



Location tracking & route replay



Vehicle health reports & analytics



Driver behavior & safety scorecard



AI-powered video telematics



Electronic Logging Device compliance



Customizable web & mobile dashboards

62

⁶¹ <https://www.business.att.com/resources/knowledge-center/how-fleet-tracking-can-optimize-business.html>.

⁶² <https://www.business.att.com/products/fleet-complete.html>.

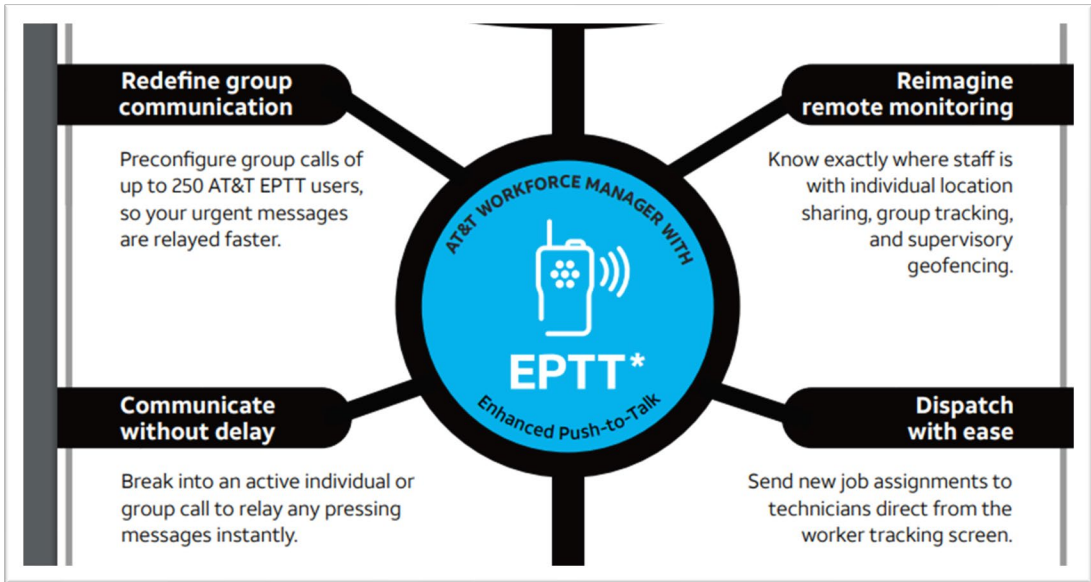
Mobile assets

As business owners, you should always have clarity and understanding when it comes to the assets and tools that power your operations. By allowing you to monitor the status and locations of your high-value assets, AT&T Workforce Manager protects your business by giving you:

- Current location information for your high-value mobile assets
- Greater likelihood of retrieving stolen property more quickly
- Opportunities to react quickly after receiving notices of an asset's status changes
- Theft and recovery supports, activity alerts, GPS tracking, geofencing, and the ability to create ad hoc reports

The solution uses intuitive and user-friendly technology that can help you curb losses and increase your peace of mind.

63

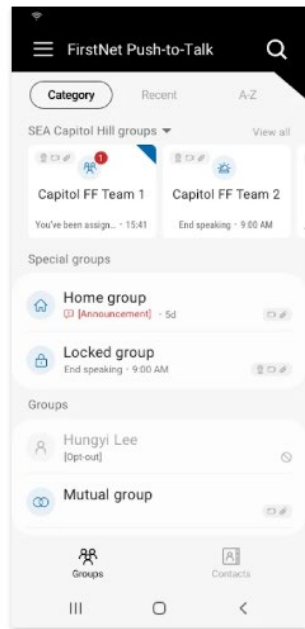


64

⁶³ <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>.

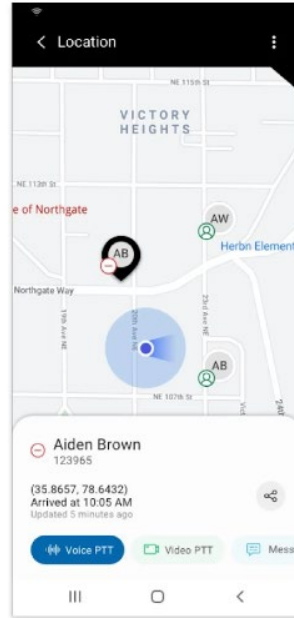
⁶⁴ <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>.

Create talk groups by referencing jurisdictional zones for group organization.



Note: All names are fictitious

Locate team members and initiate PTT calls from a map interface









Note: All names are fictitious



65

Benefits

Supporting first responder communications


 <p>Geofence group creation Dynamic groups creation using a geofence with a radius you determine</p>	 <p>Communicate more Attach files, photos, and videos up to 100MB each and voice memos up to 10 minutes</p>
 <p>Visibility Rest easy knowing your messaging was received with confirmations for sent, delivered, and even read messages</p>	 <p>Technical help With our trained technical support on standby 24/7, you can rest easy knowing you'll have the help when you need it</p>
 <p>Federated contacts Easily share or import contacts from other agencies</p>	 <p>Compatibility Messaging service works with major U.S. carriers and is also compatible with any device with text message capabilities</p>

66

⁶⁵ <https://play.google.com/store/apps/details?id=com.att.firstnet.grey>.

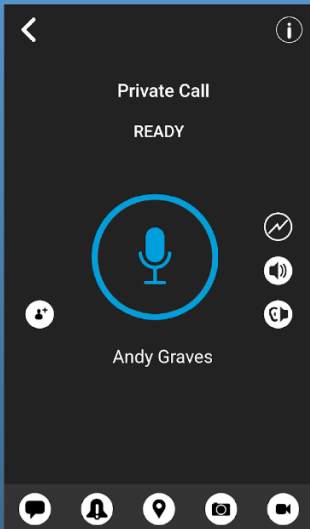
⁶⁶ <https://www.firstnet.com/apps/featured-apps/firstnet-messaging.html>.

- Individuals
 - Sending My Location or an Arbitrary Location to a Contact
 - Sending My Location or an Arbitrary Location to a Quick Group
 - Sending My Location or an Arbitrary Location to a Talkgroup
- Supervisor with Location Capability
 - Talkgroup Member Location
 - Boundary
 - Creating a Quick Group from the Map

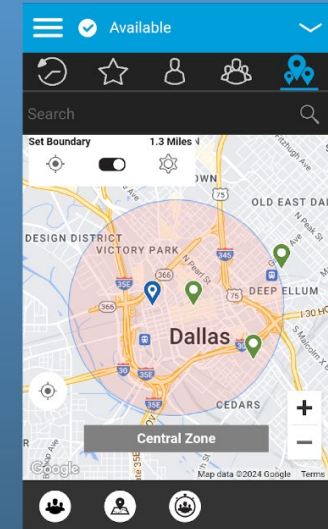


67

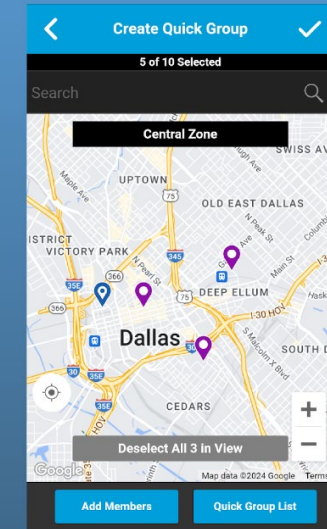
Talk or send secure text and media to a group or one person.



Share your location and geofence group members you supervise.



Make a group call to those that you select on the map.



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⁶⁷ <https://www.firstnet.com/content/dam/firstnet/white-papers/firstnet-rapid-response-ptt-android-app-user-guide.pdf>.

⁶⁸ <https://play.google.com/store/apps/details?id=com.att.eptt>.



69

59. AGIS Software has suffered damages as a result of AT&T's direct and indirect infringement of the '251 Patent in an amount to be proved at trial.

60. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of AT&T's infringement of the '251 Patent for which there is no adequate remedy at law, unless AT&T's infringement is enjoined by this Court.

COUNT III **(Infringement of the '838 Patent)**

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

⁶⁹ <https://play.google.com/store/apps/details?id=com.att.amigoapp>.

62. AGIS Software has not licensed or otherwise authorized AT&T to make, use, offer for sale, sell, distribute, export from, or import any products that embody the inventions of the '838 Patent.

63. AT&T has and continues to directly infringe at least claim 54 of the '838 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).

64. AT&T has and continues to directly infringe at least claim 54 of the '838 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).

65. AT&T has and continues to indirectly infringe at least claim 54 of the '838 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 '838 Patent. For example, AT&T, with knowledge that the Accused Products infringe the '838 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 '838 Patent.

66. For example, AT&T has indirectly infringed and continues to indirectly infringe at least claim 54 of the '838 Patent in the United States because AT&T's customers use the Accused Products, including at least AT&T Secure Family, AT&T Fleet Complete, AT&T Fleet Tracker system, and AT&T Workforce Manager, alone or in conjunction with additional Accused

Products, in accordance with AT&T's instructions and thereby directly infringe at least one claim of the '838 Patent in violation of 35 U.S.C. § 271. AT&T 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.att.com/support/article/wireless/KM1271913/>;
<https://www.att.com/support/article/wireless/KM1299008/>;
<https://www.youtube.com/watch?v=L4GJBMceDN0&t=105s>;
<https://www.att.com/security/secure-family-app/>; <https://screenready.att.com/digital-parenting/>;
<https://www.att.com/support/article/wireless/KM1271913> and AT&T agents and representatives located within this Judicial District. AT&T is thereby liable for infringement of the '838 Patent under 35 U.S.C. § 271(b).

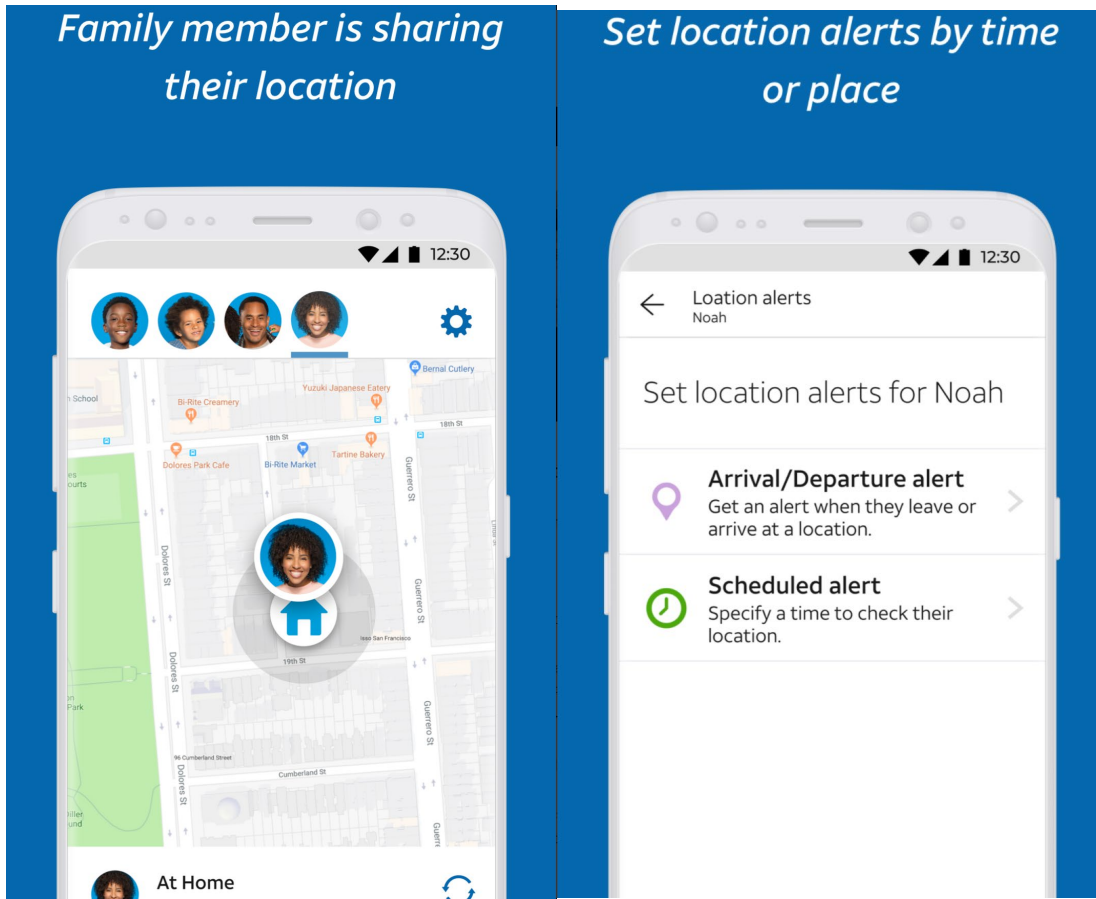
67. The Secure Family Applications directly and indirectly infringe at least claim 54 of the '838 Patent by comprising a system of a first device programmed to perform operations comprising, joining a communication network corresponding to a group, wherein joining the communication network comprises transmitting a message including an identifier corresponding to the group; participating in the group, wherein the participating in the group includes 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; presenting, via an interactive display of the first device, a first interactive, georeferenced map and a first set of one or more user-selectable symbols corresponding to a first set of one or more of the second devices, wherein the first set of symbols are positioned on the first georeferenced map at respective positions corresponding to the locations of the first set of

second devices, and wherein first georeferenced map data relate positions on the first georeferenced map to spatial coordinates; sending, to a second server, a request for second georeferenced map data different from the first georeferenced map data; receiving, from the second server, the second georeferenced map data; receiving, from the second server, the second georeferenced map data; presenting, via the interactive display of the first device, a second georeferenced map and a second set of one or more user-selectable symbols corresponding to a second set of one or more of the second devices, wherein the second set of symbols are positioned on the second georeferenced map at respective positions corresponding to the locations of the second set of second devices, and wherein the second georeferenced map data relate positions on the second georeferenced map to spatial coordinates; and identifying user interaction with the interactive display selecting one or more of the second set of user-selectable symbols corresponding to one or more of the second devices and positioned on the second georeferenced map and user interaction with the display specifying an action and, based thereon, sending third data to the selected one or more second devices via the first server.

68. For example, Family Secure allows users to share their locations and view other users' locations on a map and to communicate with those users via the Family Secure App.

69. For example, Family Secure allows users to establish groups (*e.g.*, of family members), and to exchange messages and calls via SMS, and/or via interaction with AT&T's servers which provide the Family Secure services, among other relevant services. The exemplary Accused Products further allow users to retrieve map information from multiple sources, including street-view maps.

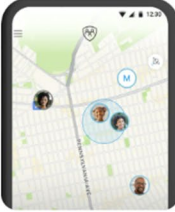
70. The exemplary Accused Products are programmed to receive messages from other devices where those messages relate to joining groups, as depicted below:



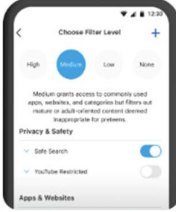
70

https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

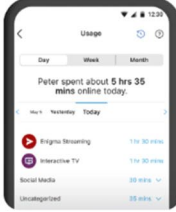
Top safety features



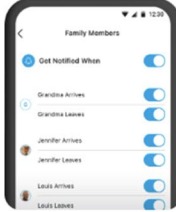
Location tracking
Track family member's devices in real-time on an interactive map, or track their location history on a breadcrumb trail map.
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



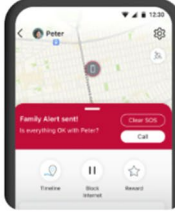
Control what they access
Filter or block apps and online content based on age-appropriate settings and set time limits for internet access and app usage.



Double check their online activities
View your child's internet and app usage for the last 30 days, and temporarily halt their internet access when it's time for homework, bed, or dinner.



Set location alerts
Get alerts when your child enters or leaves a saved area, or schedule alerts for additional peace of mind.
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



SOS alerts
One press of a button sends an SOS alert to the whole family.

71

It's easy to get started

1

Sign up and download

Enroll in Secure Family and connect up to 30 devices per Secure Family account.

2

Set up your family profiles

Add your phone numbers to your Secure Family profile.

[View setup guide >](#)

3

Invite your family to the hub

Install and pair the Secure Family companion app on your kids' devices.

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⁷¹ <https://www.att.com/security/secure-family-app/>.

⁷² <https://www.att.com/security/secure-family-app/>.

Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
- **Save a place:** Save frequently visited places on a map like work, school, child's friend's house.
- **Alert options:** Set scheduled or arrival and departure alerts to keep up with your child's location.
- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

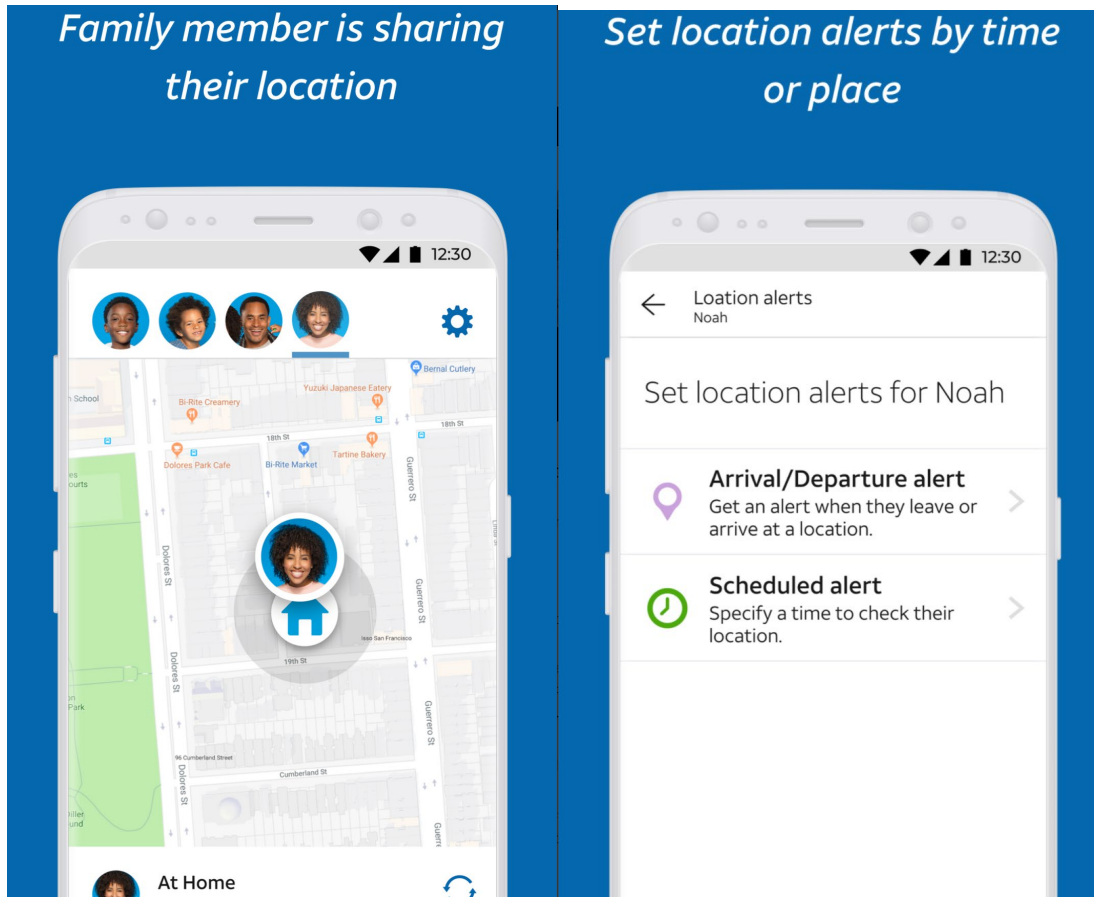
- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

[Learn more about internet control features](#)

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71. 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:

⁷³ <https://www.att.com/support/article/wireless/KM1271913>.

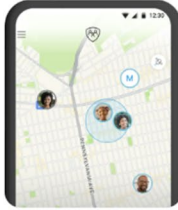


74

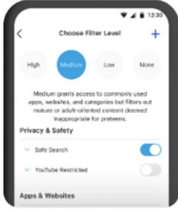
74

https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

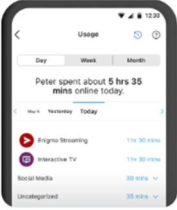
Top safety features



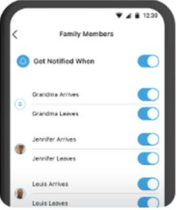
Location tracking
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Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



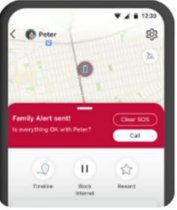
Control what they access
Filter or block apps and online content based on age-appropriate settings and set time limits for internet access and app usage.



Double check their online activities
View your child's internet and app usage for the last 30 days, and temporarily halt their internet access when it's time for homework, bed, or dinner.



Set location alerts
Get alerts when your child enters or leaves a saved area, or schedule alerts for additional peace of mind.
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



SOS alerts
One press of a button sends an SOS alert to the whole family.

75

Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
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- **Alert options:** Set scheduled or arrival and departure alerts to keep up with your child's location.
- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

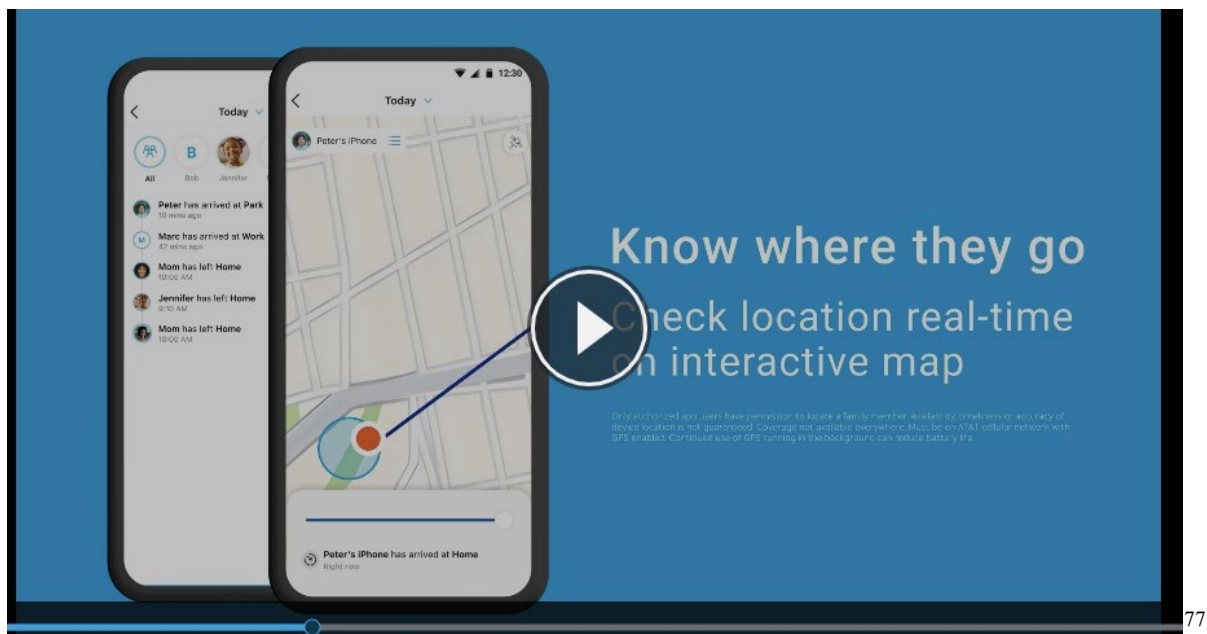
- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

[Learn more about internet control features](#)

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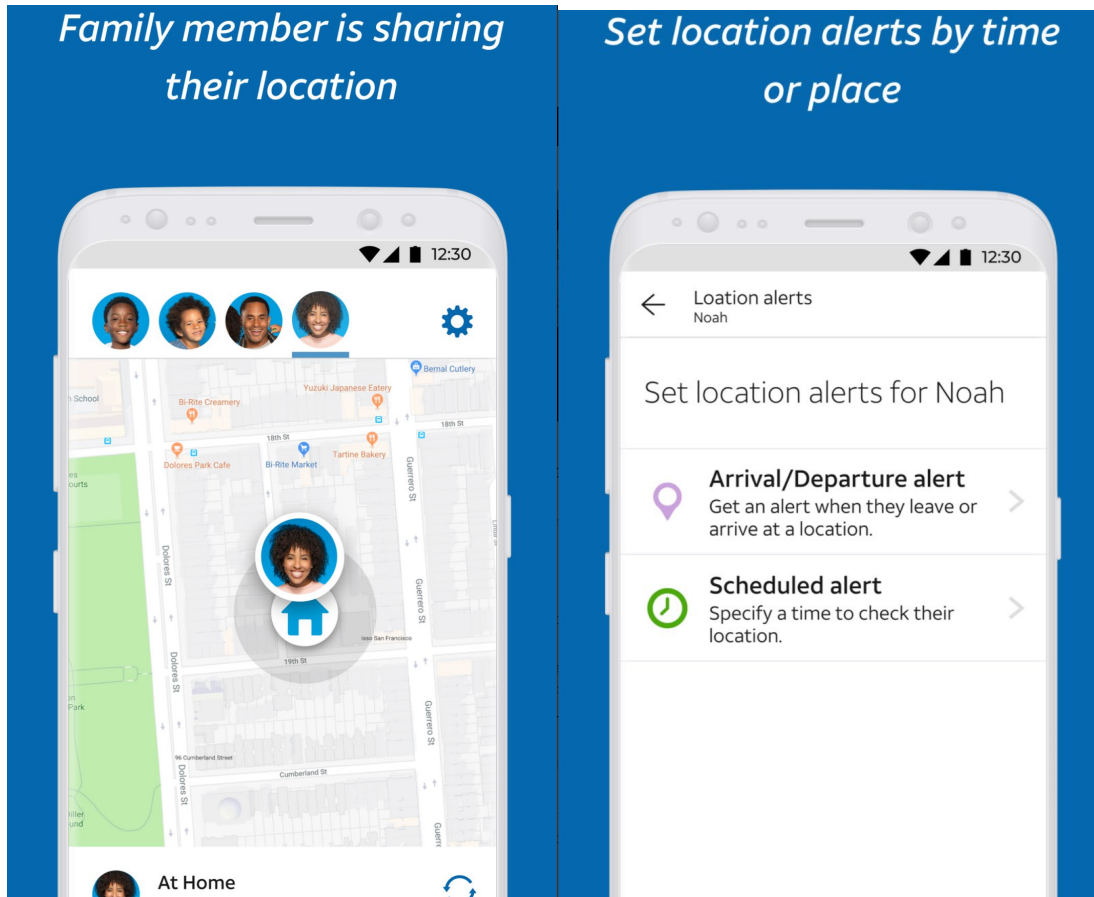
⁷⁵ <https://www.att.com/security/secure-family-app/>.

⁷⁶ <https://www.att.com/support/article/wireless/KM1271913>.



72. 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:

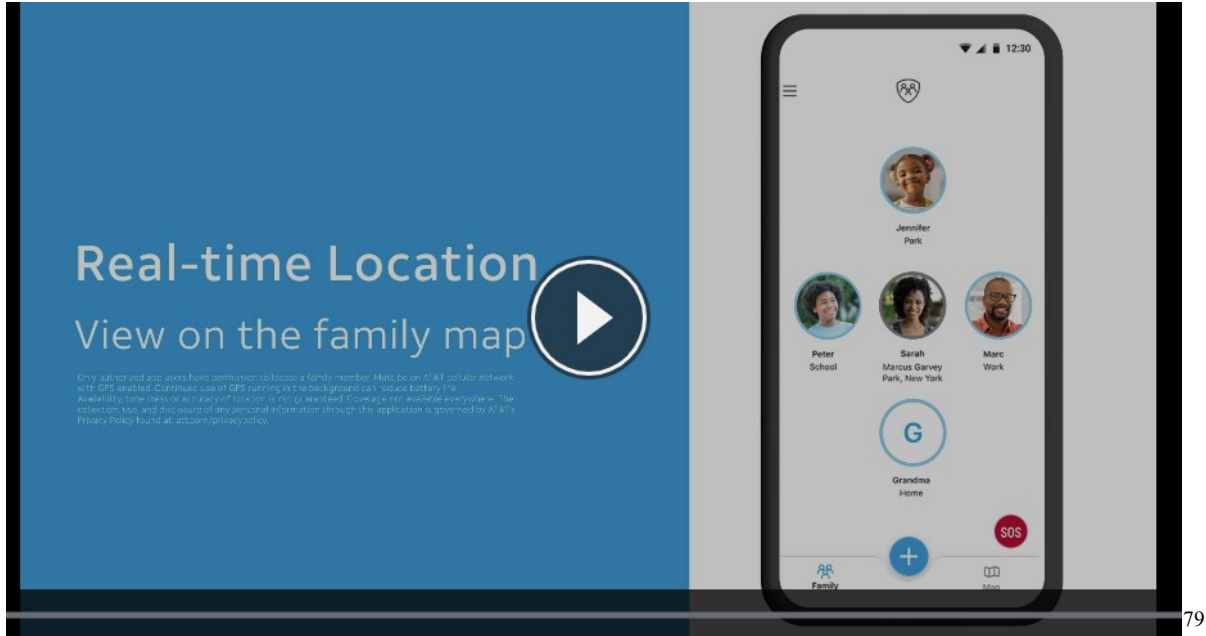
⁷⁷ <https://www.att.com/security/secure-family-app/>.



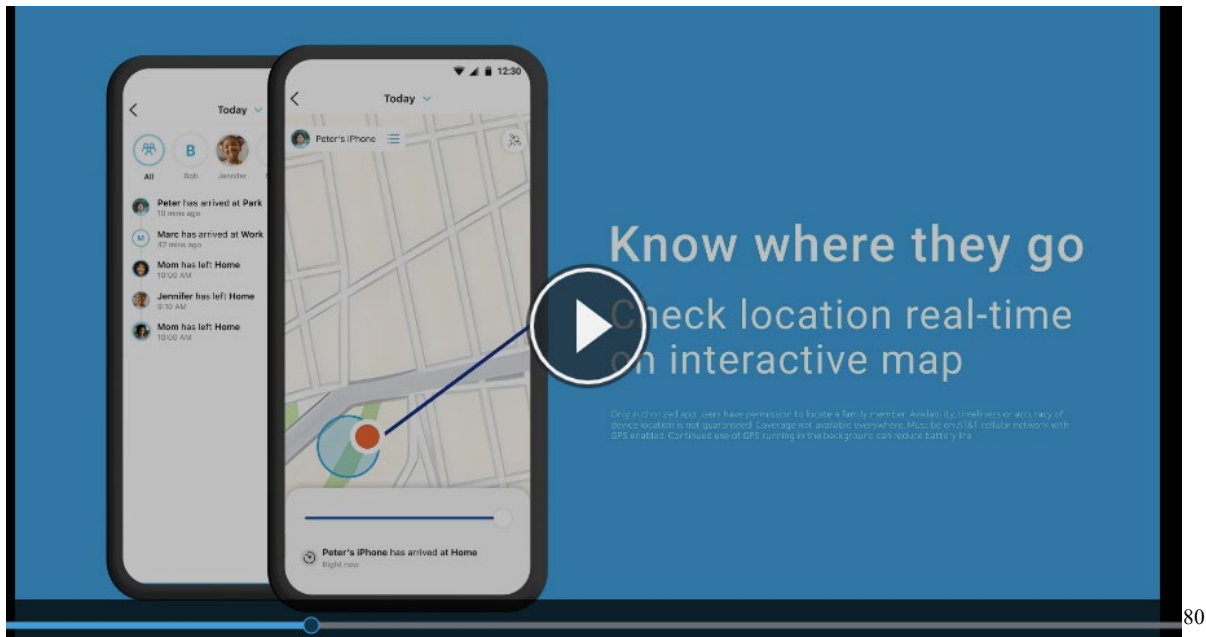
78

78

https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US



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80

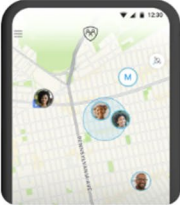
73. For example, the Family Secure Applications, are programmed to permit users to request and display additional maps by, for example, moving the map screen and/or by selecting satellite image maps. The exemplary Accused Products are further programmed to permit

⁷⁹ <https://www.att.com/security/secure-family-app/>.

⁸⁰ <https://www.att.com/security/secure-family-app/>.

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.

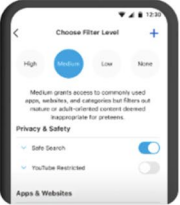
Top safety features



Location tracking

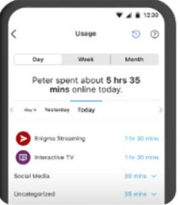
Track family member's devices in real-time on an interactive map, or track their location history on a breadcrumb trail map.

Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



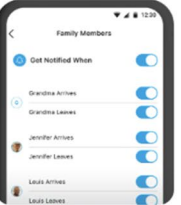
Control what they access

Filter or block apps and online content based on age-appropriate settings and set time limits for internet access and app usage.



Double check their online activities

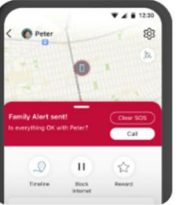
View your child's internet and app usage for the last 30 days, and temporarily halt their internet access when it's time for homework, bed, or dinner.



Set location alerts

Get alerts when your child enters or leaves a saved area, or schedule alerts for additional peace of mind.

Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



SOS alerts

One press of a button sends an SOS alert to the whole family.

81

Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
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- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

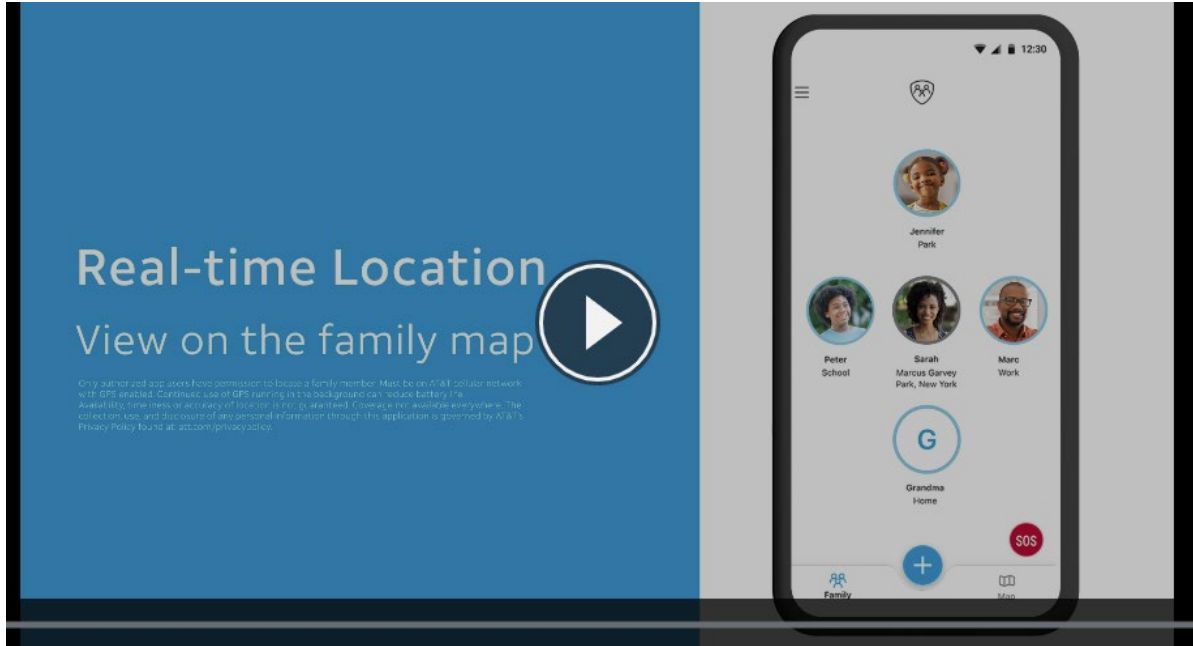
- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

[Learn more about internet control features](#)

82

⁸¹ <https://www.att.com/security/secure-family-app/>.

⁸² <https://www.att.com/support/article/wireless/KM1271913>.



83

74. The Accused Products, such as AT&T FirstNet, AT&T FirstNet Messaging, AT&T FirstNet Push-to-Talk, AT&T Enhanced PTT, AT&T FirstNet Rapid Response, and AT&T amiGO further include similar features and functionality to Secure Family, and infringe in a substantially similar manner.⁸⁴

⁸³ <https://www.att.com/security/secure-family-app/>.

⁸⁴ See e.g. www.att.com/workforcemanager; <https://www.twowaydirect.com/att-workforce-manager-with-enhanced-push-to-talk/>; <https://www.business.att.com/content/dam/attbusiness/briefs/workforce-manager-product-brief.pdf>; <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>; <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>; <https://apps.apple.com/us/app/at-t-workforce-manager/id986304516>; https://about.att.com/newsroom/2018/fleet_management_video_analytics.html; <https://asecare.att.com/product/att-fleet-management-enterprise-government/>; <https://asecare.att.com/tutorials/view-breadcrumb-trail-att-fleet-management-enterprise-government/?product=AT&T%20Fleet%20Management%20for%20Enterprise/Government>; <https://www.youtube.com/watch?v=3boL--1RWKM>

The bottom line

- AT&T Fleet Complete uses advanced GPS to track vehicles and assets in near real-time, allowing fleet managers to increase the efficiency and productivity of their fleets.
- This gives companies the visibility and control they need to reduce fuel and insurance costs, improve customer satisfaction and retention, lower maintenance expenses, prevent unauthorized vehicle use, decrease the carbon footprint of the fleet, and stay in compliance of industry and government regulations.
- AT&T Fleet Complete customers report a Return on Investment after only two to five months—making it easy to make the decision to roll out a fleet tracking, management, and logistics solution today.

85

AT&T Fleet Complete features

Save time with one platform that does it all



Location tracking & route replay



Vehicle health reports & analytics



Driver behavior & safety scorecard



AI-powered video telematics



Electronic Logging Device compliance



Customizable web & mobile dashboards

86

⁸⁵ <https://www.business.att.com/resources/knowledge-center/how-fleet-tracking-can-optimize-business.html>.

⁸⁶ <https://www.business.att.com/products/fleet-complete.html>.

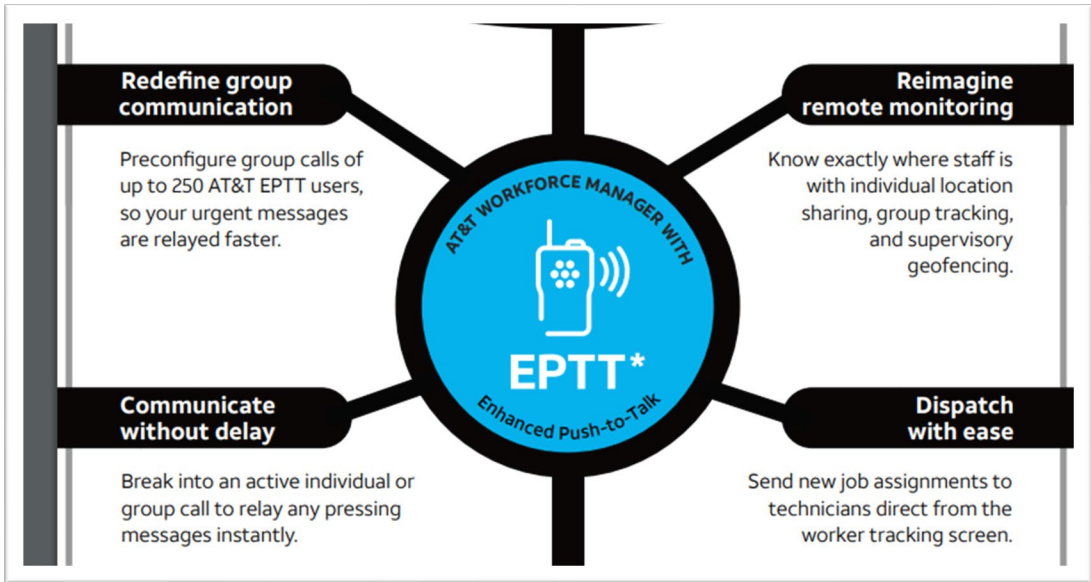
Mobile assets

As business owners, you should always have clarity and understanding when it comes to the assets and tools that power your operations. By allowing you to monitor the status and locations of your high-value assets, AT&T Workforce Manager protects your business by giving you:

- Current location information for your high-value mobile assets
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87

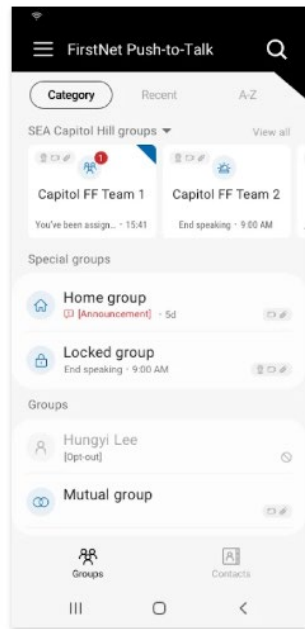


88

⁸⁷ <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>.

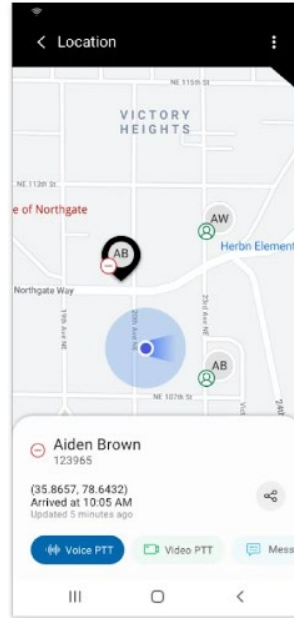
⁸⁸ <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>.

Create talk groups by referencing jurisdictional zones for group organization.



Note: All names are fictitious

Locate team members and initiate PTT calls from a map interface









Note: All names are fictitious



Benefits

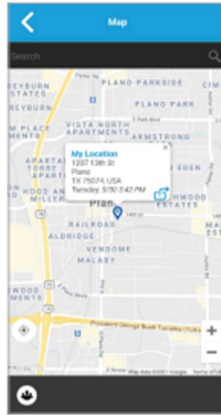
Supporting first responder communications

 <p>Geofence group creation Dynamic groups creation using a geofence with a radius you determine</p>	 <p>Communicate more Attach files, photos, and videos up to 100MB each and voice memos up to 10 minutes</p>
 <p>Visibility Rest easy knowing your messaging was received with confirmations for sent, delivered, and even read messages</p>	 <p>Technical help With our trained technical support on standby 24/7, you can rest easy knowing you'll have the help when you need it</p>
 <p>Federated contacts Easily share or import contacts from other agencies</p>	 <p>Compatibility Messaging service works with major U.S. carriers and is also compatible with any device with text message capabilities</p>

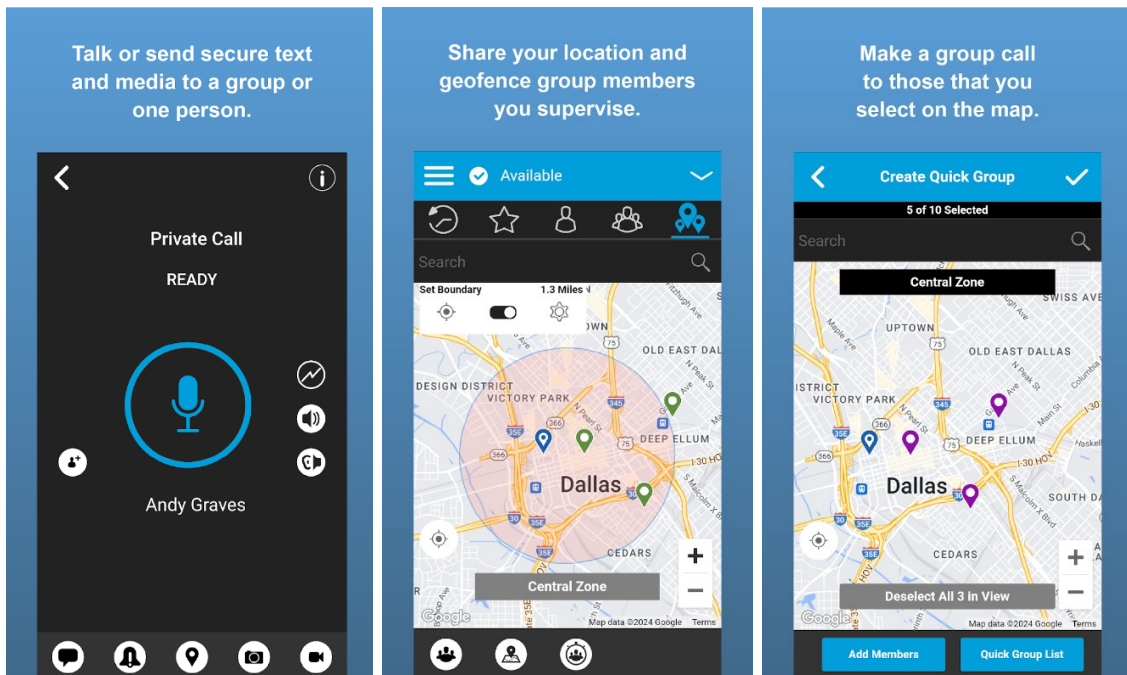
⁸⁹ <https://play.google.com/store/apps/details?id=com.att.firstnet.grey>.

⁹⁰ <https://www.firstnet.com/apps/featured-apps/firstnet-messaging.html>.

- Individuals
 - Sending My Location or an Arbitrary Location to a Contact
 - Sending My Location or an Arbitrary Location to a Quick Group
 - Sending My Location or an Arbitrary Location to a Talkgroup
- Supervisor with Location Capability
 - Talkgroup Member Location
 - Boundary
 - Creating a Quick Group from the Map



91



92

⁹¹ <https://www.firstnet.com/content/dam/firstnet/white-papers/firstnet-rapid-response-ptt-android-app-user-guide.pdf>.

⁹² <https://play.google.com/store/apps/details?id=com.att.eptt>.



93

75. AGIS Software has suffered damages as a result of AT&T's direct and indirect infringement of the '838 Patent in an amount to be proved at trial.

76. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of AT&T's infringement of the '838 Patent for which there is no adequate remedy at law, unless AT&T's infringement is enjoined by this Court.

COUNT IV
(Infringement of the '123 Patent)

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

⁹³ <https://play.google.com/store/apps/details?id=com.att.amigoapp>.

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

79. AT&T 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).

80. AT&T 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, AT&T, 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, AT&T believed there was a high probability that others would infringe the '123 Patent but remained willfully blind to the infringing nature of others' actions.

81. For example, AT&T has indirectly infringed and continues to indirectly infringe at least claim 23 of the '123 Patent in the United States because AT&T's customers use the Accused Products, including at least AT&T Secure Family, AT&T Fleet Complete, AT&T Fleet Tracker system, and AT&T Workforce Manager, alone or in conjunction with additional Accused Products, in accordance with AT&T's instructions and thereby directly infringe at least one claim

of the '123 Patent in violation of 35 U.S.C. § 271. AT&T 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.att.com/support/article/wireless/KM1271913/>;
<https://www.att.com/support/article/wireless/KM1299008/>;
<https://www.youtube.com/watch?v=L4GJBMceDN0&t=105s>;
<https://www.att.com/security/secure-family-app/>; <https://screenready.att.com/digital-parenting/>;
<https://www.att.com/support/article/wireless/KM1271913> and AT&T agents and representatives located within this Judicial District. AT&T is thereby liable for infringement of the '123 Patent under 35 U.S.C. § 271(b).

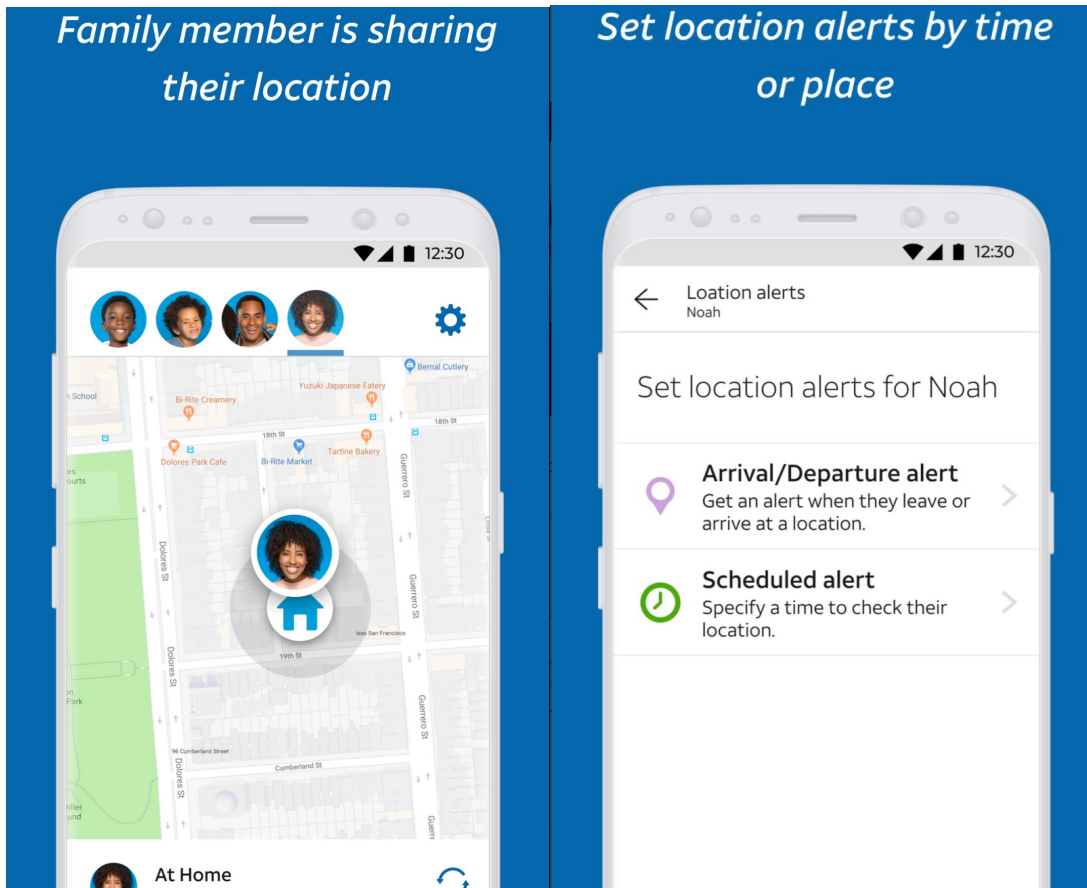
82. Alternatively, AT&T believed there was a high probability that others would infringe the '123 Patent but remained willfully blind to the infringing nature of others' actions. For example, AT&T directly infringes and/or indirectly infringes by instructing its customers to infringe by a system comprising: 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.

83. For example, AT&T'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.

84. Additionally, the exemplary Accused Products allows users to establish groups and to exchange messages via interaction with servers which provide the Secure Family services, among other relevant services.

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

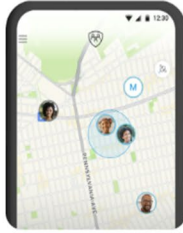


94

94

https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

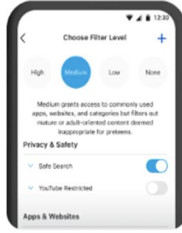
Top safety features



Location tracking

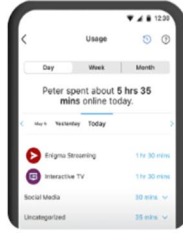
Track family member's devices in real-time on an interactive map, or track their location history on a breadcrumb trail map.

Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



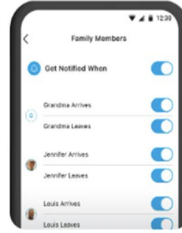
Control what they access

Filter or block apps and online content based on age-appropriate settings and set time limits for internet access and app usage.



Double check their online activities

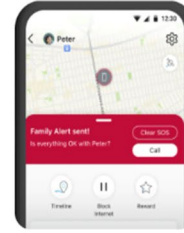
View your child's internet and app usage for the last 30 days, and temporarily halt their internet access when it's time for homework, bed, or dinner.



Set location alerts

Get alerts when your child enters or leaves a saved area, or schedule alerts for additional peace of mind.

Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



SOS alerts

One press of a button sends an SOS alert to the whole family.

95

⁹⁵ <https://www.att.com/security/secure-family-app/>.

It's easy to get started

- 1 Sign up and download**
Enroll in Secure Family and connect up to 30 devices per Secure Family account.
- 2 Set up your family profiles**
Add your phone numbers to your Secure Family profile.
[View setup guide >](#)
- 3 Invite your family to the hub**
Install and pair the Secure Family companion app on your kids' devices.

96

Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
- **Save a place:** Save frequently visited places on a map like work, school, child's friend's house.
- **Alert options:** Set scheduled or arrival and departure alerts to keep up with your child's location.
- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

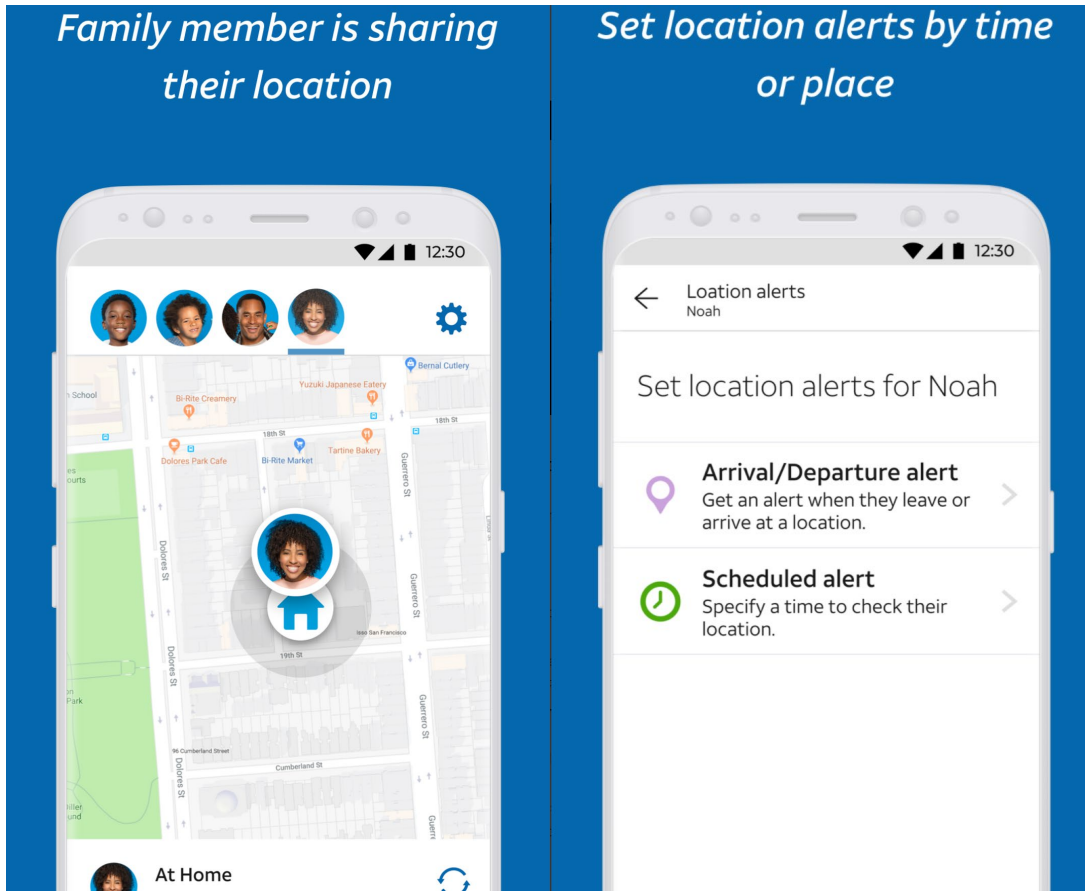
[Learn more about internet control features](#)

97

86. 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:

⁹⁶ <https://www.att.com/security/secure-family-app/>.

⁹⁷ <https://www.att.com/support/article/wireless/KM1271913>.

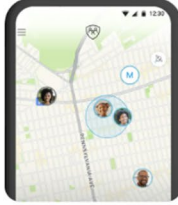


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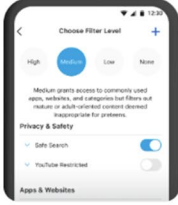
98

https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

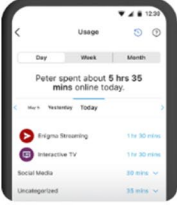
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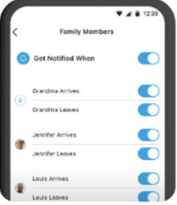
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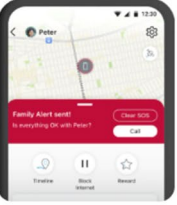
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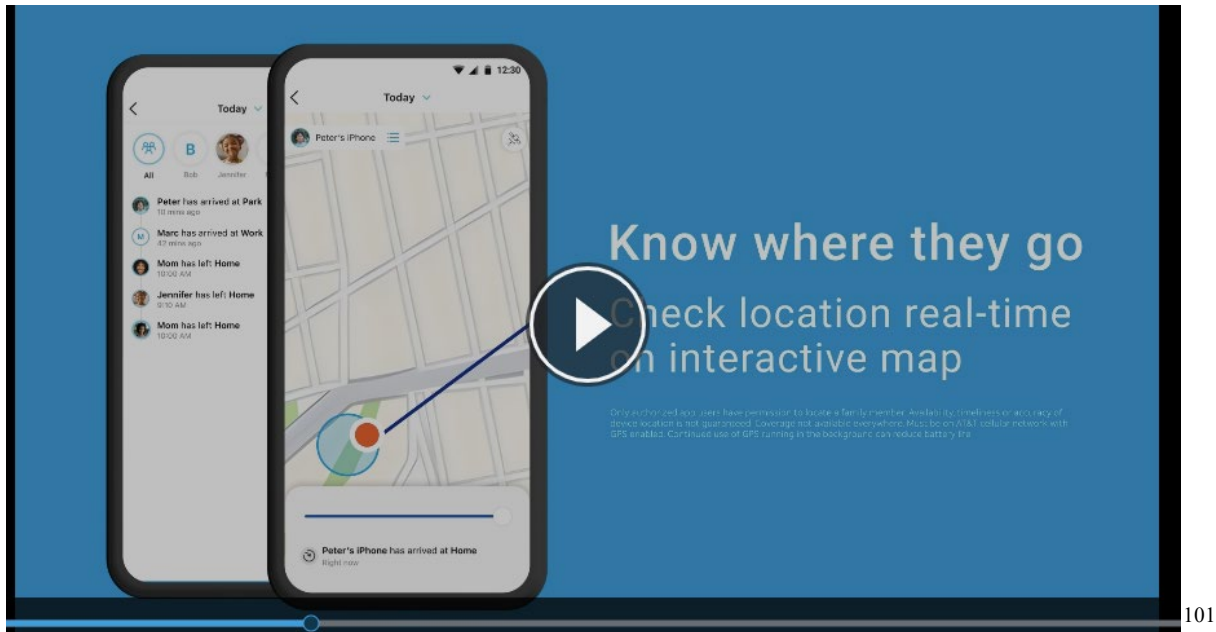
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100

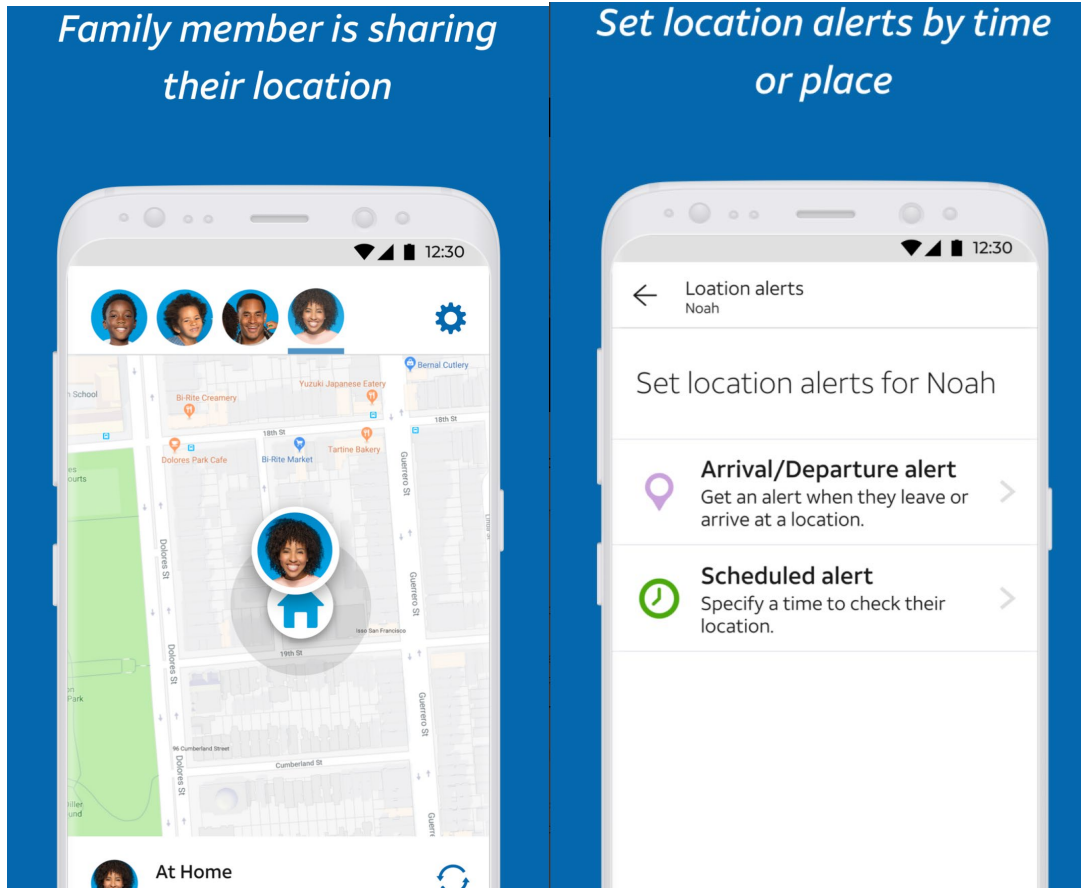
⁹⁹ <https://www.att.com/security/secure-family-app/>.

¹⁰⁰ <https://www.att.com/support/article/wireless/KM1271913>.



87. 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:

¹⁰¹ <https://www.att.com/security/secure-family-app/>.



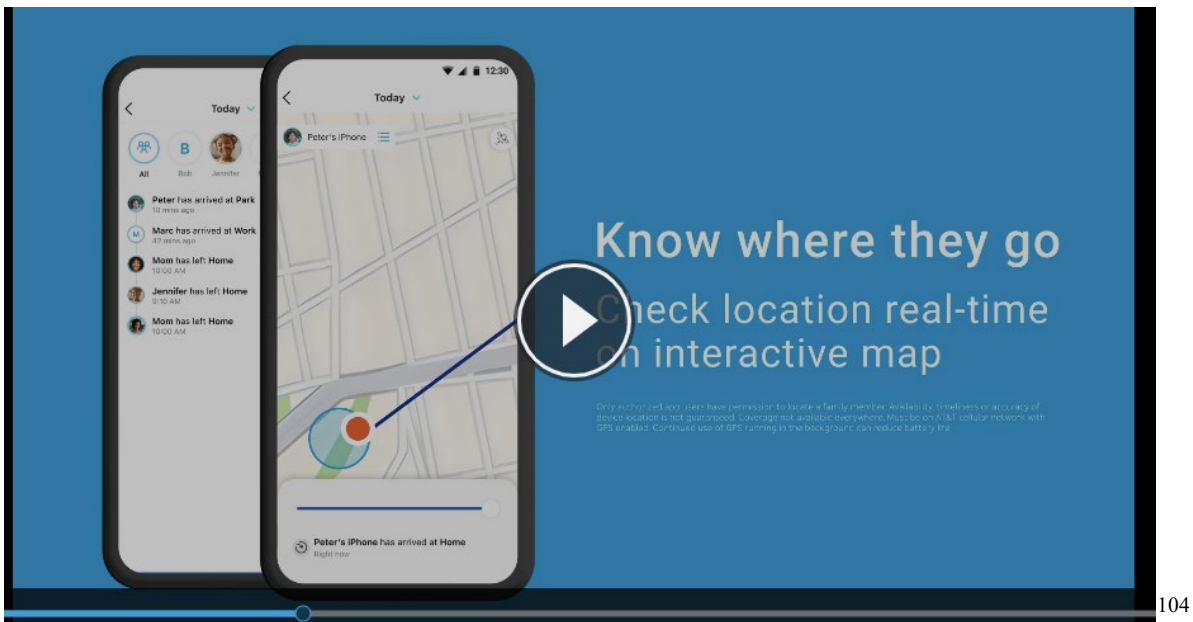
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102

https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US



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88. 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

¹⁰³ <https://www.att.com/security/secure-family-app/>.

¹⁰⁴ <https://www.att.com/security/secure-family-app/>.

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.

89. The Accused Products, such as AT&T FirstNet, AT&T FirstNet Messaging, AT&T FirstNet Push-to-Talk, AT&T Enhanced PTT, AT&T FirstNet Rapid Response, and AT&T amiGO further include similar features and functionality to Secure Family, and infringe in a substantially similar manner.¹⁰⁵

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¹⁰⁵ See e.g. www.att.com/workforcemanager; <https://www.twowaydirect.com/att-workforce-manager-with-enhanced-push-to-talk/>; <https://www.business.att.com/content/dam/attbusiness/briefs/workforce-manager-product-brief.pdf>; <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>; <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>; <https://apps.apple.com/us/app/at-t-workforce-manager/id986304516>; https://about.att.com/newsroom/2018/fleet_management_video_analytics.html; <https://asecare.att.com/product/att-fleet-management-enterprise-government/>; <https://asecare.att.com/tutorials/view-breadcrumb-trail-att-fleet-management-enterprise-government/?product=AT&T%20Fleet%20Management%20for%20Enterprise/Government>; <https://www.youtube.com/watch?v=3boL--1RWKM>

¹⁰⁶ <https://www.business.att.com/resources/knowledge-center/how-fleet-tracking-can-optimize-business.html>.

AT&T Fleet Complete features

Save time with one platform that does it all

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 AI-powered video telematics	 Electronic Logging Device compliance	 Customizable web & mobile dashboards

107

¹⁰⁷ <https://www.business.att.com/products/fleet-complete.html>.

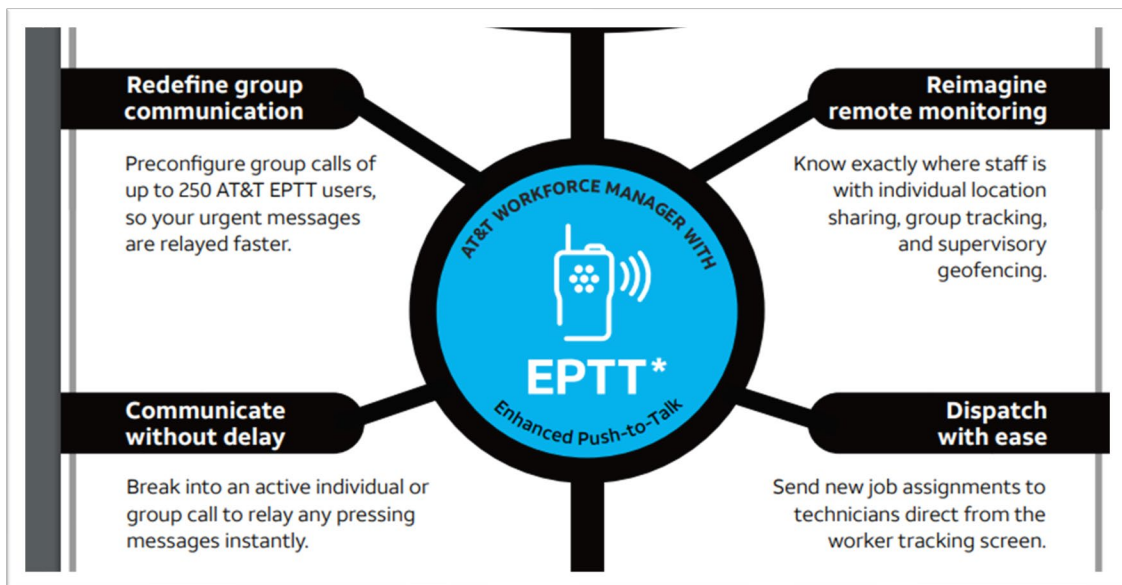
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108

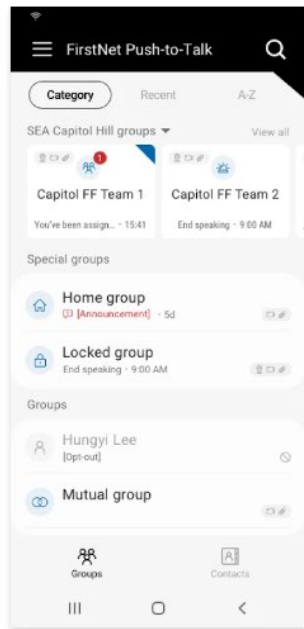


109

¹⁰⁸ <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>.

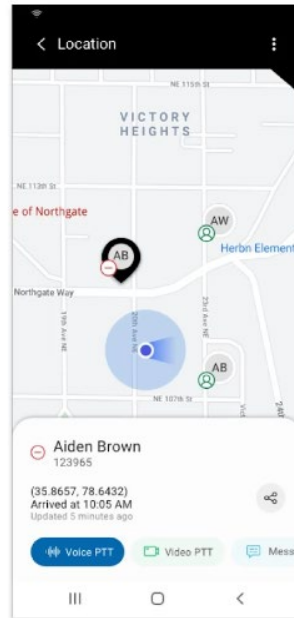
¹⁰⁹ <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>.

Create talk groups by referencing jurisdictional zones for group organization.



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Locate team members and initiate PTT calls from a map interface









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110

Benefits

Supporting first responder communications

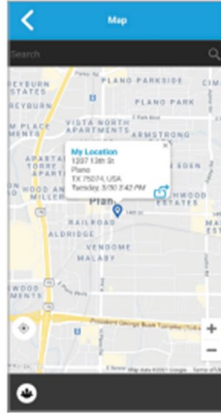
 <p>Geofence group creation Dynamic groups creation using a geofence with a radius you determine</p>	 <p>Communicate more Attach files, photos, and videos up to 100MB each and voice memos up to 10 minutes</p>
 <p>Visibility Rest easy knowing your messaging was received with confirmations for sent, delivered, and even read messages</p>	 <p>Technical help With our trained technical support on standby 24/7, you can rest easy knowing you'll have the help when you need it</p>
 <p>Federated contacts Easily share or import contacts from other agencies</p>	 <p>Compatibility Messaging service works with major U.S. carriers and is also compatible with any device with text message capabilities</p>

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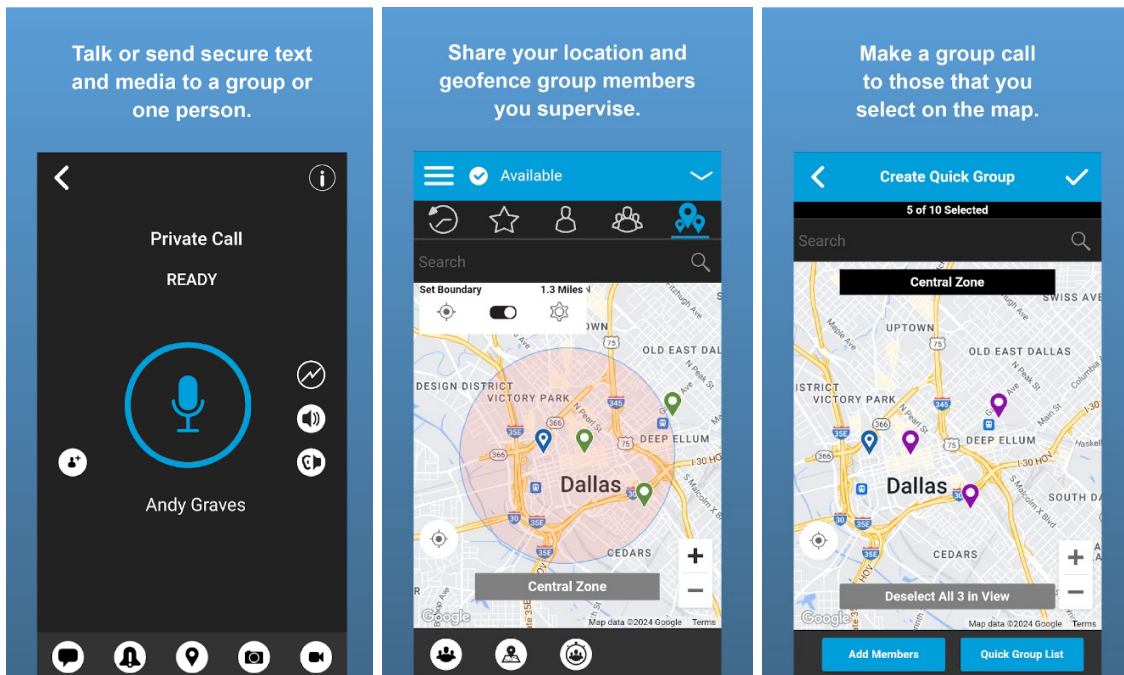
¹¹⁰ <https://play.google.com/store/apps/details?id=com.att.firstnet.grey>.

¹¹¹ <https://www.firstnet.com/apps/featured-apps/firstnet-messaging.html>.

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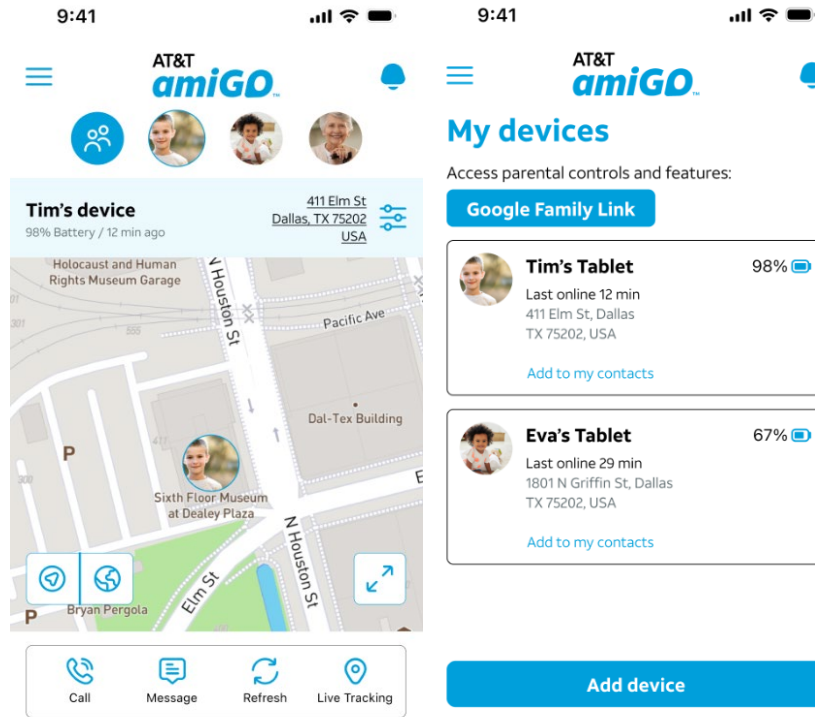
112



113

¹¹² <https://www.firstnet.com/content/dam/firstnet/white-papers/firstnet-rapid-response-ptt-android-app-user-guide.pdf>.

¹¹³ <https://play.google.com/store/apps/details?id=com.att.eptt>.



114

90. AGIS Software has suffered damages as a result of AT&T’s direct and indirect infringement of the ’123 Patent in an amount to be proved at trial.

91. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of AT&T’s infringement of the ’123 Patent for which there is no adequate remedy at law unless AT&T’s infringement is enjoined by this Court.

COUNT V
(Infringement of the ’829 Patent)

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

¹¹⁴ <https://play.google.com/store/apps/details?id=com.att.amigoapp>.

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

94. AT&T 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).

95. AT&T 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, AT&T, 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, AT&T believed there was a high probability that others would infringe the '829 Patent but remained willfully blind to the infringing nature of others' actions.

96. For example, AT&T has indirectly infringed and continues to indirectly infringe at least claim 34 of the '829 Patent in the United States because AT&T's customers use the Accused Products, including at least AT&T Secure Family, AT&T Fleet Complete, AT&T Fleet Tracker system, and AT&T Workforce Manager, alone or in conjunction with additional Accused Products, in accordance with AT&T's instructions and thereby directly infringe at least one claim

of the '829 Patent in violation of 35 U.S.C. § 271. AT&T 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.att.com/support/article/wireless/KM1271913/>;
<https://www.att.com/support/article/wireless/KM1299008/>;
<https://www.youtube.com/watch?v=L4GJBMceDN0&t=105s>;
<https://www.att.com/security/secure-family-app/>; <https://screenready.att.com/digital-parenting/>;
<https://www.att.com/support/article/wireless/KM1271913> and AT&T agents and representatives located within this Judicial District. AT&T is thereby liable for infringement of the '829 Patent under 35 U.S.C. § 271(b).

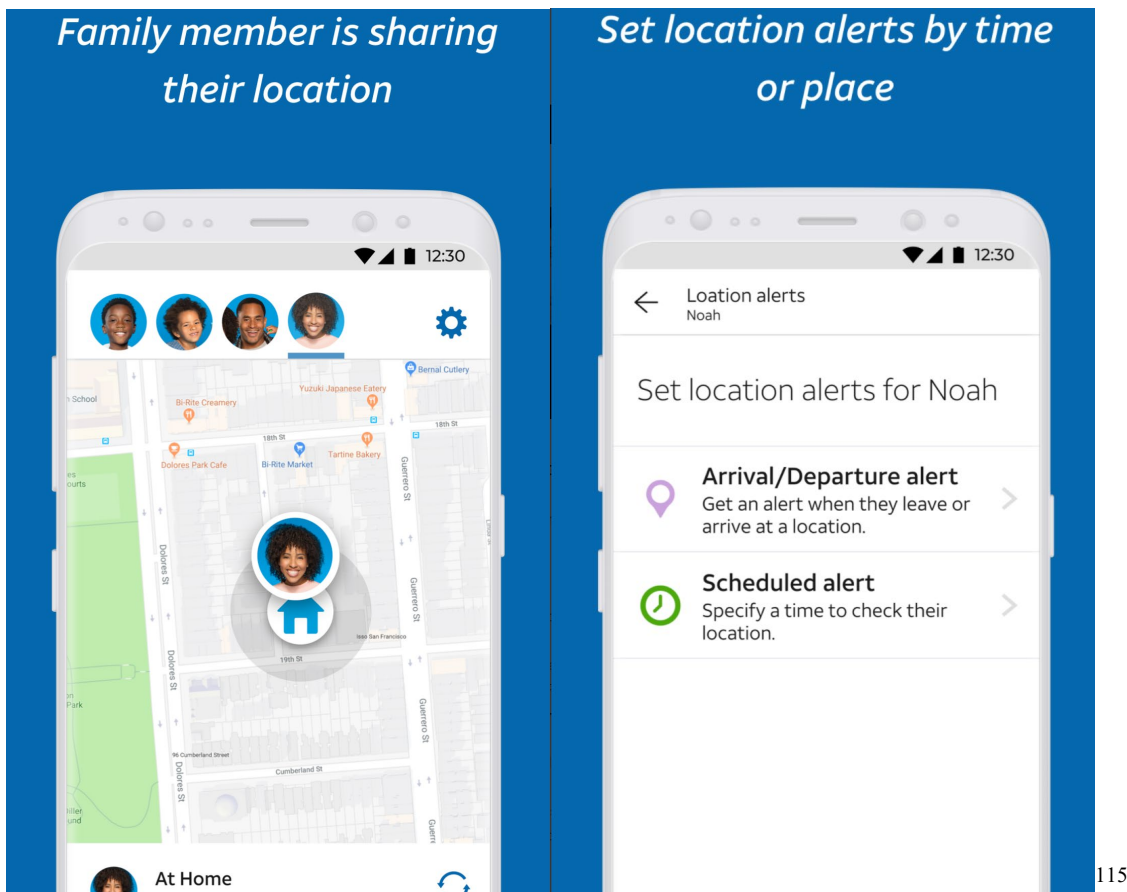
97. Alternatively, AT&T believed there was a high probability that others would infringe the '829 Patent but remained willfully blind to the infringing nature of others' actions. For example, AT&T directly infringes and/or indirectly infringes by instructing its customers to infringe by a system comprising: 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.

98. For example, AT&T’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.

99. Additionally, the exemplary Accused Products allows users to establish groups and to exchange messages via interaction with servers which provide the Secure Family services, among other relevant services.

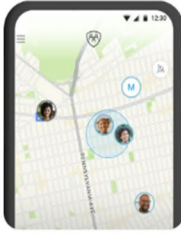
100. The exemplary Accused Products are programmed to form and join groups by transmitting messages:



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https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

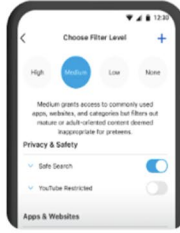
Top safety features



Location tracking

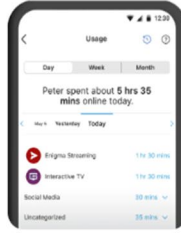
Track family member's devices in real-time on an interactive map, or track their location history on a breadcrumb trail map.

Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



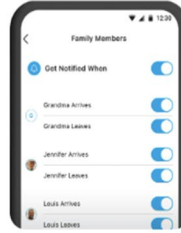
Control what they access

Filter or block apps and online content based on age-appropriate settings and set time limits for internet access and app usage.



Double check their online activities

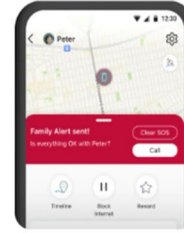
View your child's internet and app usage for the last 30 days, and temporarily halt their internet access when it's time for homework, bed, or dinner.



Set location alerts

Get alerts when your child enters or leaves a saved area, or schedule alerts for additional peace of mind.

Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



SOS alerts

One press of a button sends an SOS alert to the whole family.

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¹¹⁶ <https://www.att.com/security/secure-family-app/>.

It's easy to get started

1

Sign up and download

Enroll in Secure Family and connect up to 30 devices per Secure Family account.

2

Set up your family profiles

Add your phone numbers to your Secure Family profile.

[View setup guide >](#)

3

Invite your family to the hub

Install and pair the Secure Family companion app on your kids' devices.

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Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
- **Save a place:** Save frequently visited places on a map like work, school, child's friend's house.
- **Alert options:** Set scheduled or arrival and departure alerts to keep up with your child's location.
- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

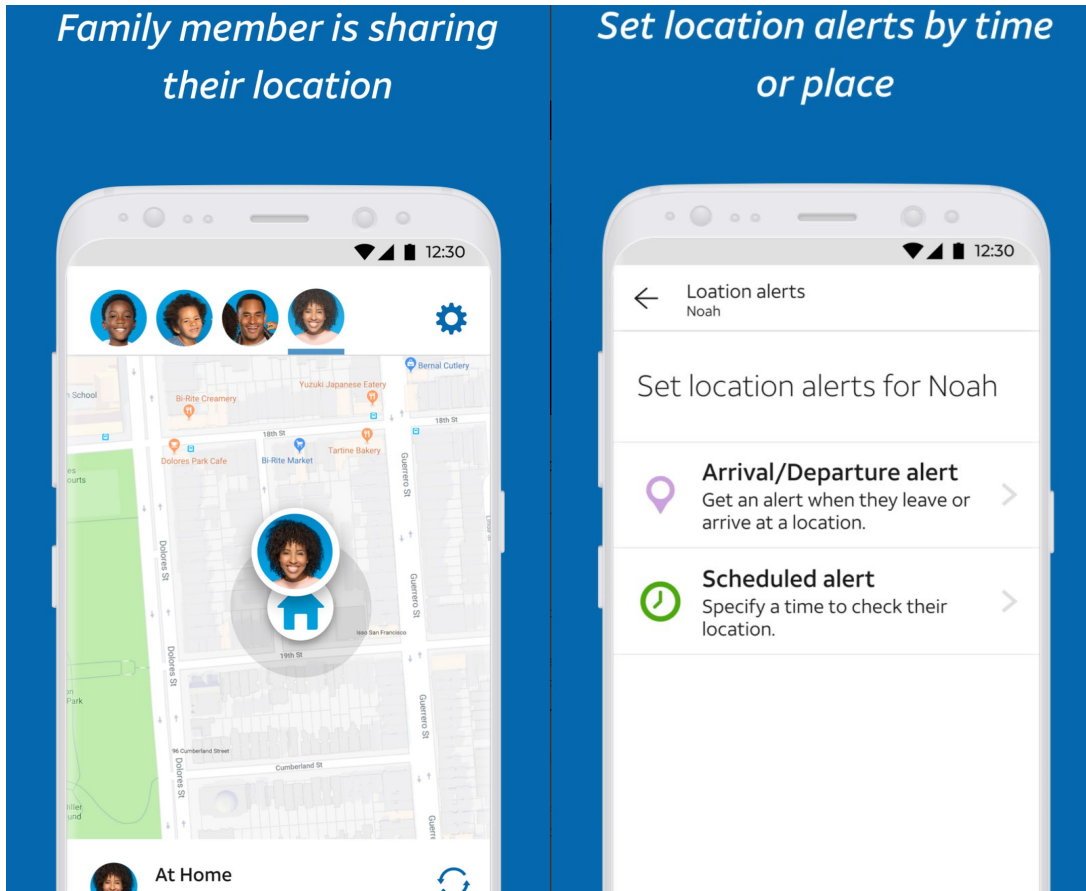
[Learn more about internet control features](#)

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101. 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:

¹¹⁷ <https://www.att.com/security/secure-family-app/>.

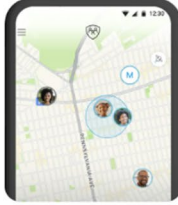
¹¹⁸ <https://www.att.com/support/article/wireless/KM1271913>.



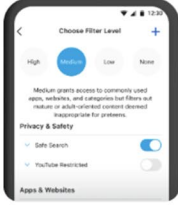
119

https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US

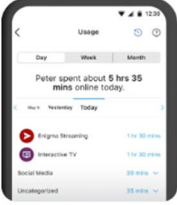
Top safety features



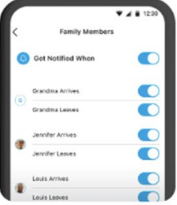
Location tracking
Track family member's devices in real-time on an interactive map, or track their location history on a breadcrumb trail map.
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



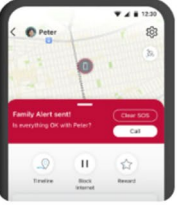
Control what they access
Filter or block apps and online content based on age-appropriate settings and set time limits for internet access and app usage.



Double check their online activities
View your child's internet and app usage for the last 30 days, and temporarily halt their internet access when it's time for homework, bed, or dinner.



Set location alerts
Get alerts when your child enters or leaves a saved area, or schedule alerts for additional peace of mind.
Availability, timeliness, or accuracy of device location not guaranteed. Coverage not available everywhere.



SOS alerts
One press of a button sends an SOS alert to the whole family.

120

Features

Location tracking features

- **Real-time location:** Locate a family member's device on a satellite or street-view map.
- **Save a place:** Save frequently visited places on a map like work, school, child's friend's house.
- **Alert options:** Set scheduled or arrival and departure alerts to keep up with your child's location.
- **Location history:** See where a family member has been over the past seven days.
- **Check in:** Have family members check in at a destination to let you know they have arrived.

[Learn more about location tracking features](#)

Internet access features

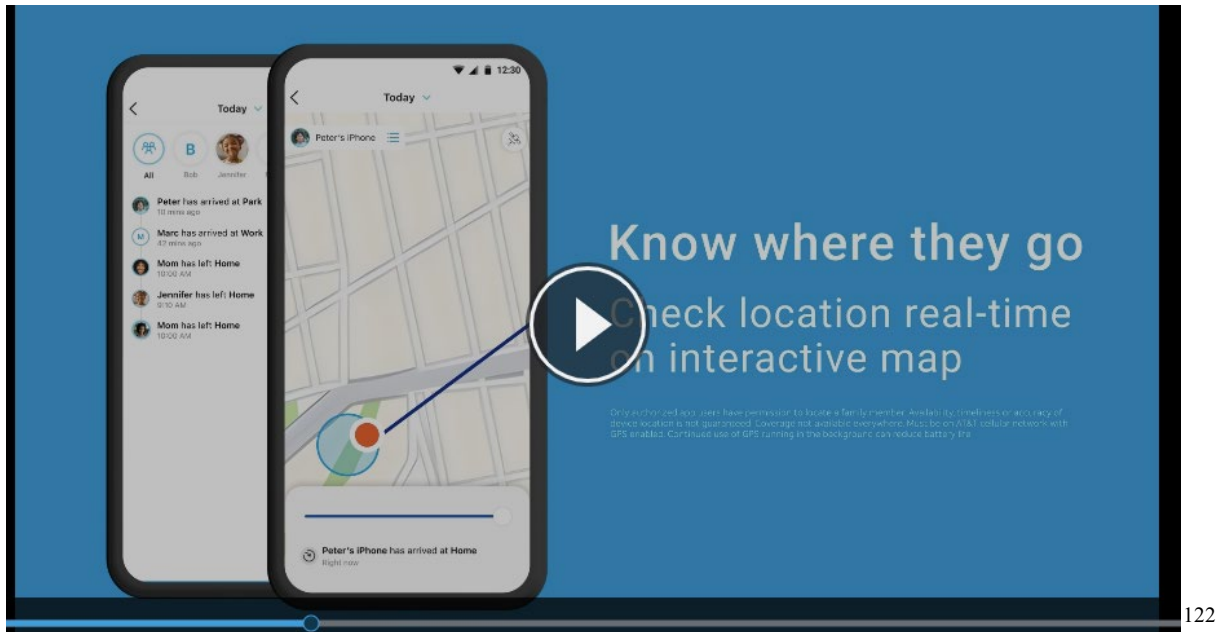
- **Block internet:** Block your family's internet access from their mobile devices. Or turn Wi-Fi® and cellular data for a child's device on or off with the tap of a button.
- **Set internet times:** Schedule times when your child's device can't access the internet through cellular data or Wi-Fi (time for homework, dinner, bedtime).

[Learn more about internet control features](#)

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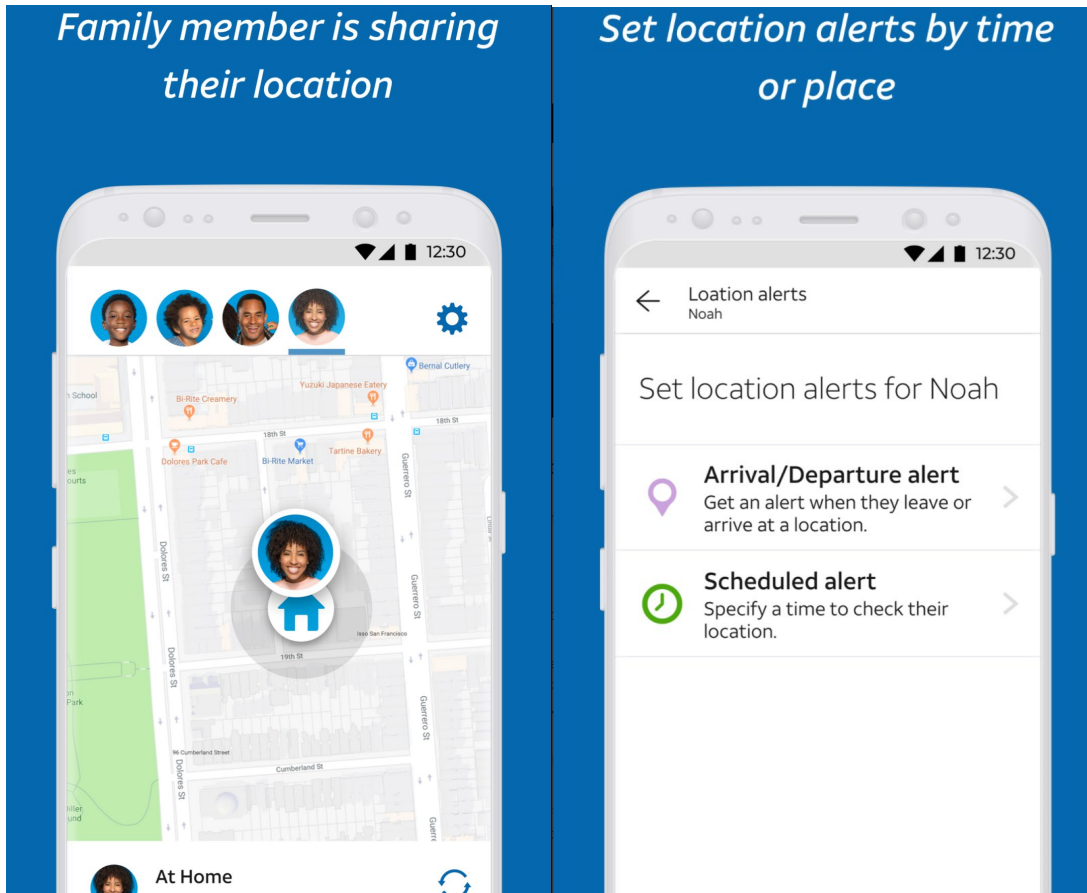
¹²⁰ <https://www.att.com/security/secure-family-app/>.

¹²¹ <https://www.att.com/support/article/wireless/KM1271913>.



102. 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:

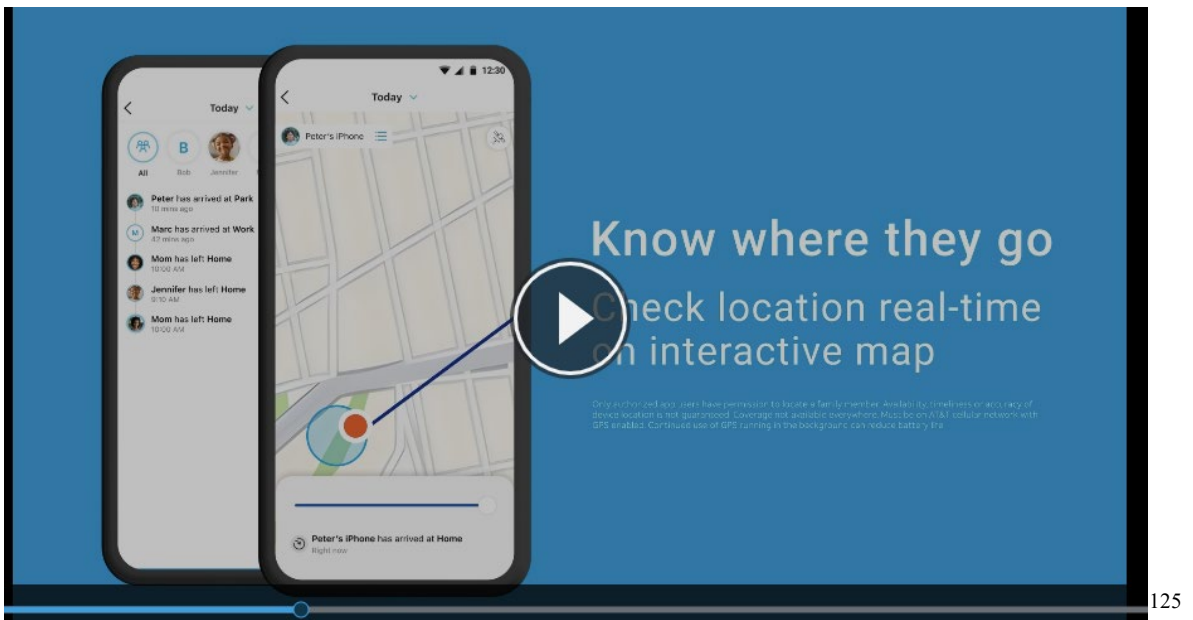
¹²² <https://www.att.com/security/secure-family-app/>.



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https://play.google.com/store/apps/details?id=com.att.securefamilycompanion&hl=en_US&gl=US;
https://play.google.com/store/apps/details?id=com.wavemarket.waplauncher&hl=en_US&gl=US



103. 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

¹²⁴ <https://www.att.com/security/secure-family-app/>.

¹²⁵ <https://www.att.com/security/secure-family-app/>.

symbols and where the exemplary Accused Products further permit data to be sent to other devices based on that interaction.

104. The Accused Products, such as AT&T FirstNet, AT&T FirstNet Messaging, AT&T FirstNet Push-to-Talk, AT&T Enhanced PTT, AT&T FirstNet Rapid Response, and AT&T amiGO further include similar features and functionality to Secure Family, and infringe in a substantially similar manner.¹²⁶

The bottom line

- AT&T Fleet Complete uses advanced GPS to track vehicles and assets in near real-time, allowing fleet managers to increase the efficiency and productivity of their fleets.
- This gives companies the visibility and control they need to reduce fuel and insurance costs, improve customer satisfaction and retention, lower maintenance expenses, prevent unauthorized vehicle use, decrease the carbon footprint of the fleet, and stay in compliance of industry and government regulations.
- AT&T Fleet Complete customers report a Return on Investment after only two to five months—making it easy to make the decision to roll out a fleet tracking, management, and logistics solution today.







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¹²⁶ See e.g. www.att.com/workforcemanager; <https://www.twowaydirect.com/att-workforce-manager-with-enhanced-push-to-talk/>; <https://www.business.att.com/content/dam/attbusiness/briefs/workforce-manager-product-brief.pdf>; <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>; <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>; <https://apps.apple.com/us/app/at-t-workforce-manager/id986304516>; https://about.att.com/newsroom/2018/fleet_management_video_analytics.html; <https://asecare.att.com/product/att-fleet-management-enterprise-government/>; <https://asecare.att.com/tutorials/view-breadcrumb-trail-att-fleet-management-enterprise-government/?product=AT&T%20Fleet%20Management%20for%20Enterprise/Government>; <https://www.youtube.com/watch?v=3boL--1RWKM>

¹²⁷ <https://www.business.att.com/resources/knowledge-center/how-fleet-tracking-can-optimize-business.html>.

AT&T Fleet Complete features

Save time with one platform that does it all

 Location tracking & route replay	 Vehicle health reports & analytics	 Driver behavior & safety scorecard
 AI-powered video telematics	 Electronic Logging Device compliance	 Customizable web & mobile dashboards

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¹²⁸ <https://www.business.att.com/products/fleet-complete.html>.

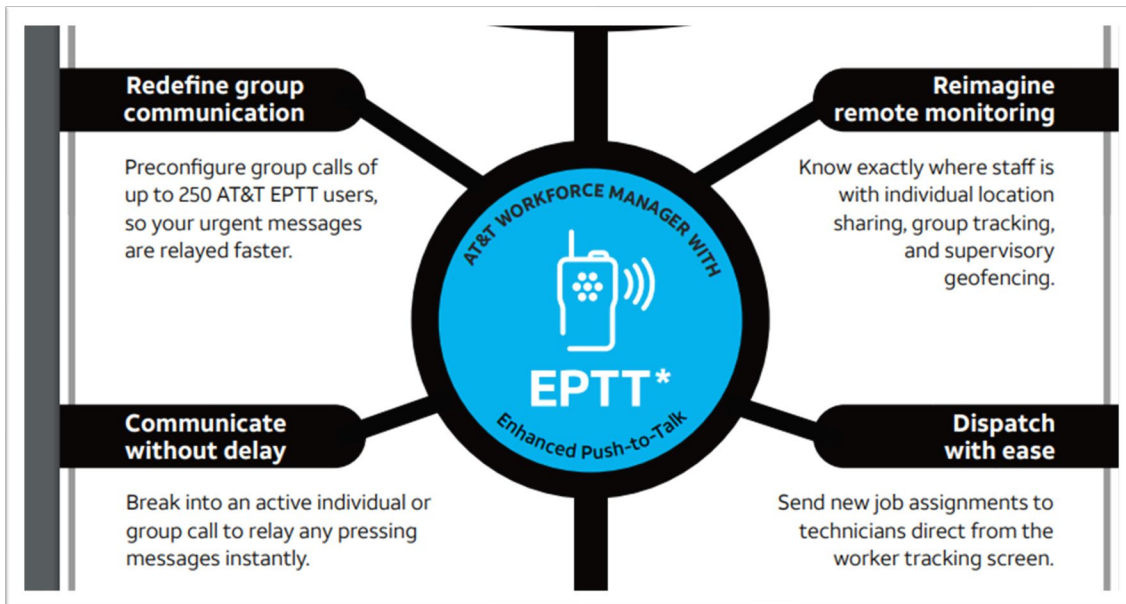
Mobile assets

As business owners, you should always have clarity and understanding when it comes to the assets and tools that power your operations. By allowing you to monitor the status and locations of your high-value assets, AT&T Workforce Manager protects your business by giving you:

- Current location information for your high-value mobile assets
- Greater likelihood of retrieving stolen property more quickly
- Opportunities to react quickly after receiving notices of an asset's status changes
- Theft and recovery supports, activity alerts, GPS tracking, geofencing, and the ability to create ad hoc reports

The solution uses intuitive and user-friendly technology that can help you curb losses and increase your peace of mind.

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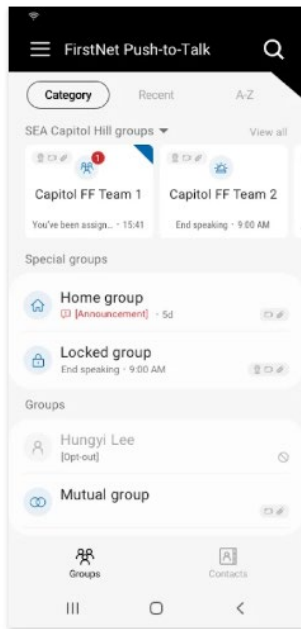
130

¹²⁹ <https://www.business.att.com/content/dam/attbusiness/reports/mobility-workforce-manager-white-paper.pdf>.

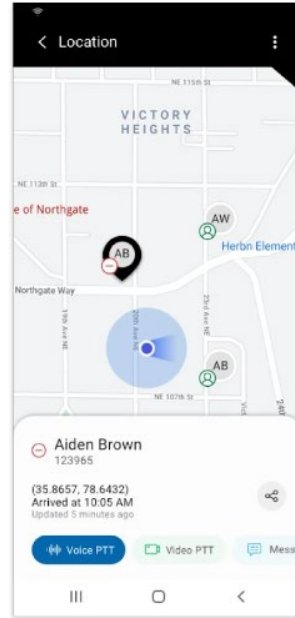
¹³⁰ <https://www.business.att.com/content/dam/attbusiness/infographics/mobility-field-management-att-workforce-manager-infographic.pdf>.

Create talk groups by referencing jurisdictional zones for group organization.

Locate team members and initiate PTT calls from a map interface



Note: All names are fictitious









Note: All names are fictitious



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Benefits

Supporting first responder communications

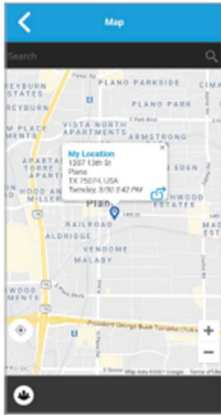
<p> Geofence group creation Dynamic groups creation using a geofence with a radius you determine</p>	<p> Communicate more Attach files, photos, and videos up to 100MB each and voice memos up to 10 minutes</p>
<p> Visibility Rest easy knowing your messaging was received with confirmations for sent, delivered, and even read messages</p>	<p> Technical help With our trained technical support on standby 24/7, you can rest easy knowing you'll have the help when you need it</p>
<p> Federated contacts Easily share or import contacts from other agencies</p>	<p> Compatibility Messaging service works with major U.S. carriers and is also compatible with any device with text message capabilities</p>

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¹³¹ <https://play.google.com/store/apps/details?id=com.att.firstnet.grey>.

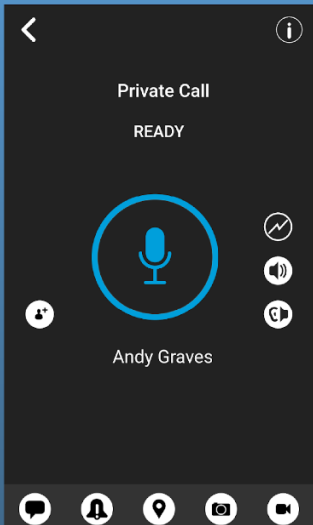
¹³² <https://www.firstnet.com/apps/featured-apps/firstnet-messaging.html>.

- Individuals
 - Sending My Location or an Arbitrary Location to a Contact
 - Sending My Location or an Arbitrary Location to a Quick Group
 - Sending My Location or an Arbitrary Location to a Talkgroup
- Supervisor with Location Capability
 - Talkgroup Member Location
 - Boundary
 - Creating a Quick Group from the Map

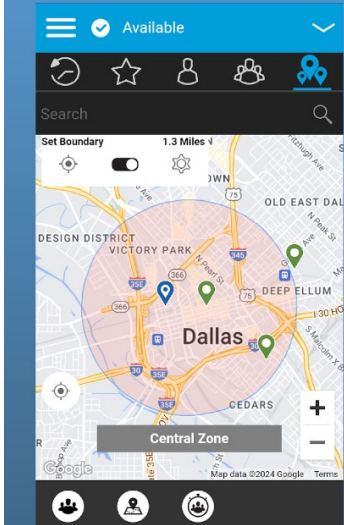


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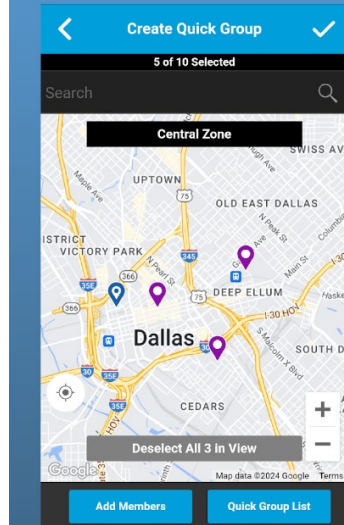
Talk or send secure text and media to a group or one person.



Share your location and geofence group members you supervise.



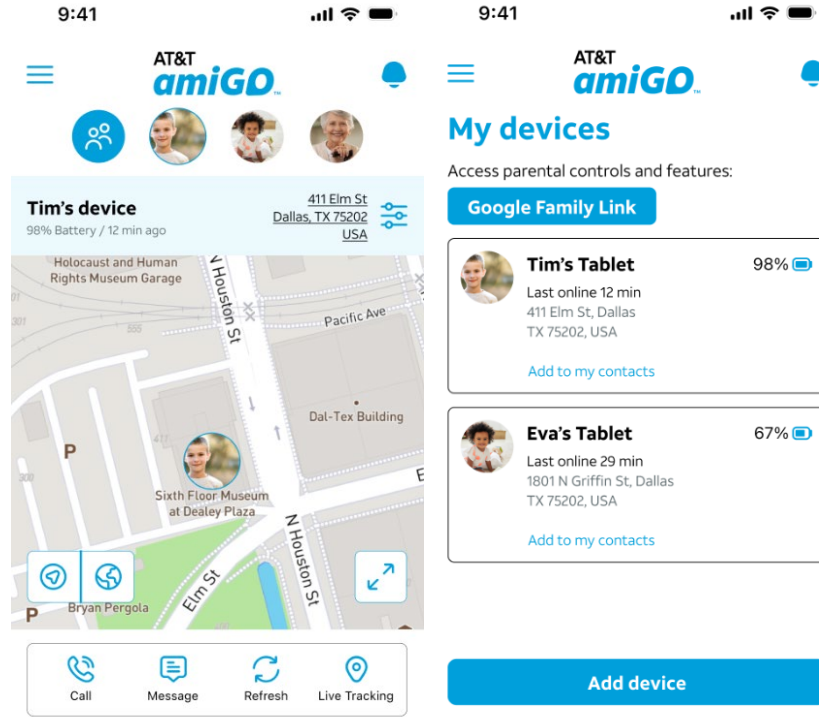
Make a group call to those that you select on the map.



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¹³³ <https://www.firstnet.com/content/dam/firstnet/white-papers/firstnet-rapid-response-ptt-android-app-user-guide.pdf>.

¹³⁴ <https://play.google.com/store/apps/details?id=com.att.eptt>.



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105. AGIS Software has suffered damages as a result of AT&T's direct and indirect infringement of the '829 Patent in an amount to be proved at trial.

106. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of AT&T's infringement of the '829 Patent for which there is no adequate remedy at law unless AT&T'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 Defendants as follows:

- a. Entry of judgment declaring that Defendants have directly and/or indirectly

¹³⁵ <https://play.google.com/store/apps/details?id=com.att.amigoapp>.

infringed one or more claims of each of the Patents-in-Suit;

b. Entry of judgment declaring that Defendants' infringement of the Patents-in-Suit has been willful and deliberate;

c. An order pursuant to 35 U.S.C. § 283 permanently enjoining Defendants, their 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 Defendants' 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 Defendants' 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
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Email: ffabricant@fabricantllp.com
Peter Lambrianakos
NY Bar No. 2894392
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**ATTORNEYS FOR PLAINTIFF,
AGIS SOFTWARE DEVELOPMENT
LLC**