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5
6 **IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

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8 **FLEET CONNECT SOLUTIONS
LLC,**

9 **Plaintiff,**

10 **v.**

11 **BELKIN INTERNATIONAL, INC.,
LINKSYS USA, INC., and LINKSYS
12 HOLDINGS, INC.,**

13 **Defendants.**

Case No. 2:24-cv-07486-SPG-SK

**FIRST AMENDED
COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

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FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

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

NATURE OF THE ACTION

1. This is a patent infringement action to stop Defendants’ infringement of the following United States Patents (collectively, the “Asserted Patents”), issued by the United States Patent and Trademark Office (“USPTO”):

| | Patent No. | Reference |
|----|-------------------|---|
| 1. | 6,549,583 | https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6549583 |
| 2. | 6,633,616 | https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6633616 |
| 3. | 7,058,040 | https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7058040 |
| 4. | 7,260,153 | https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7260153 |
| 5. | 7,656,845 | https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7656845 |
| 6. | 7,742,388 | https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7742388 |
| 7. | 8,005,053 | https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8005053 |

2. Plaintiff seeks injunctive relief and monetary damages.

PARTIES

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

4. Upon information and belief, Defendant Belkin International, Inc. (“Belkin”) is a corporation organized and existing under the laws of Delaware with a principal place of business located at 555 S Aviation Blvd., Suite 180, El Segundo, CA 90245-4852.

5. On information and belief, Defendant Linksys USA, Inc. (“Linksys USA”) is a corporation organized and existing under the laws of the State of

1 Delaware having its principal place of business at 121 Theory Drive, Suite 200,
2 Irvine, CA 92617. Linksys USA, Inc. may be served through its registered agent,
3 Corporation Service Company dba CSC-Lawyers Incorporating Service, 2710
4 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833. Linksys USA, Inc. is
5 registered to do business in the State of California.

6 6. On information and belief, Defendant Linksys Holdings, Inc. (“Linksys
7 Holdings”) is a corporation organized and existing under the laws of the Cayman
8 Islands having its principal place of business at 121 Theory Drive, Suite 200, Irvine,
9 CA 92617. On information and belief, Linksys Holdings, Inc. is the parent company
10 to Linksys USA, Inc.

11 7. Linksys Holdings, Inc. and Linksys USA, Inc. are collectively referred to
12 as “Linksys.”

13 8. Belkin and Linksys are referred to collectively as “Defendants” and, on
14 information and belief, have acted in concert with respect to the facts alleged herein
15 such that any act of one is attributable to any and all of the others and vice versa.

16 9. On information and belief, each Defendant, either itself and/or through the
17 activities of its affiliates and/or subsidiaries uses methods covered by the Asserted
18 Patents in the United States and/or induces others to use methods covered by the
19 Asserted Patents in the United States and/or contributes to their infringement of the
20 Asserted Patents.

21 10. The parties to this action are properly joined under 35 U.S.C. § 299
22 because the right to relief asserted against defendants jointly and severally arises out
23 of the same series of transactions or occurrences relating to the making and using of
24 the same products or processes (specifically, upon information and belief, Belkin
25 and Linksys have liability for certain portions of the relevant damages period related
26 to the majority of the Accused Products. *See, infra*, nn.1. Additionally, questions
27 of fact common to all defendants will arise in this action.

JURISDICTION AND VENUE

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2 11. FCS repeats and re-alleges the allegations in Paragraphs above as though
3 fully set forth in their entirety.

4 12. This is an action for infringement of a United States patent arising under
5 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject matter
6 jurisdiction of the action under 28 U.S.C. § 1331 and § 1338(a).

7 13. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)-(d) and
8 1400(b) because Belkin resides in this district, has its principal place of business in
9 this district, has conducted and continues to conduct business in this district, and has
10 committed and continues to commit acts of infringement in this district.

11 14. Venue is proper as to Linksys in this Judicial District under 28 U.S.C. §
12 1400(b) because, *inter alia*, on information and belief, Linksys maintains a regular
13 and established place of business in this Judicial District at 121 Theory Drive, Suite
14 200, Irvine, CA 92617, and has committed acts of patent infringement in this Judicial
15 District and/or has contributed to or induced acts of patent infringement by others in
16 this District.

17 15. Belkin is subject to personal jurisdiction of this Court because, *inter alia*,
18 on information and belief, (i) Belkin maintains its headquarters in California in this
19 Judicial District at 555 Aviation Blvd, Suite 180, El Segundo, CA 90245 and a
20 regular and established place of business at 12045 East Waterfront Drive, Playa
21 Vista, CA 90094; (ii) Belkin regularly conducts business in the State of California
22 including in this Judicial District; and (iii) Belkin has committed acts of patent
23 infringement in the State of California and/or has contributed to or induced acts of
24 patent infringement by others in the State of California.

25 16. Linksys is subject to personal jurisdiction of this Court because, *inter alia*,
26 on information and belief, (i) Linksys maintains its headquarters in California in this
27 Judicial District at 121 Theory Drive, Suite 200, Irvine, CA 92617; (ii) Linksys
28 regularly conducts business in the State of California including in this Judicial

1 District; and (iii) Linksys has committed acts of patent infringement in the State of
2 California and/or has contributed to or induced acts of patent infringement by others
3 in the State of California.

4 17. Each Defendant is subject to this Court's specific and general personal
5 jurisdiction under due process due at least to each Defendant's substantial business
6 in this judicial district, including: (i) at least a portion of the infringements alleged
7 herein; (ii) regularly transacting, doing, and/or soliciting business, engaging in other
8 persistent courses of conduct, or deriving substantial revenue from goods and
9 services provided to individuals in California and in this District; and (iii) having an
10 interest in, using or possessing real property in California.

11 18. Specifically, each Defendant intends to do and does business in, has
12 committed acts of infringement in, and continues to commit acts of infringement in
13 this District directly, through intermediaries, by contributing to and through its
14 inducement of third parties, and offers its products or services, including those
15 accused of infringement here, to customers and potential customers located in this
16 District. Each Defendant markets, sells, and delivers accused products in this
17 district, and has committed acts of infringement in this judicial district.

18 19. Each Defendant commits acts of infringement from this District,
19 including, but not limited to, use of the Accused Products and inducement of third
20 parties to use the Accused Products.

21 **THE ACCUSED PRODUCTS**

22 20. FCS repeats and re-alleges the allegations in Paragraphs above as though
23 fully set forth in their entirety.

24 21. Defendants use, cause to be used, provide, supply, or distribute one or
25 more computing devices, including, but not limited to, Atlas Max 6E - MX8503,
26 Atlas Max 6E - MX8502, Atlas Pro 6 - MX5503, Atlas Pro 6 - MX5502, MX12600,
27 MX8400C, MX4200, Hydra Pro 6 - EMR7500, Hydra Pro 6 - MR5500, Max-Stream
28 - EA7450, Max-Stream - MR7350, Hydra 6 - MR20EC, E8450 - Dual-Band

1 AX3200 WiFi 6 Router, E7350 - Dual-Band AX1800 WiFi 6 Router, Dual-Band
2 WiFi 6 Range Extender (AX1800), RE6300 AC750 BOOST WiFi Extender,
3 RE7310 - Dual-Band WiFi 6 Range Extender (AX1800), SoundForm Elite, Wemo
4 Smart Video Doorbell - WDC010), and any other devices and hardware, software,
5 and functionality that comprise substantially similar functionality (collectively, the
6 “Accused Products”).

7 22. On information and belief, the Accused Products perform wireless
8 communications and methods associated with performing and/or implementing
9 wireless communications including, but not limited to, wireless communications and
10 methods pursuant to various protocols and implementations, including, but not
11 limited to, Bluetooth, IEEE 802.11, and LTE protocols and various subsections
12 thereof, including, but not limited to, 802.11ac, 802.11b, and 802.11n.

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

19 24. On public information and belief, Belkin and Linksys are responsible for
20 liability for at least a portion of the relevant period for each of the Accused
21 Products, with the exception of claims related to the Speaker+Charger and Doorbell
22 products. *See, e.g.*, Table 1 (below); *see also infra*, nn.1. In addition, based on
23 public information and belief, Belkin is responsible for liability for at least a portion
24 of the relevant period for claims related to the Speaker+Charger and Doorbell
25 products. *See, e.g.*, Table 1 (below); *see also infra*, nn.1.

26 25. On information and belief, Defendants provide and distribute instructions
27 that guide users to use the Accused Products in an infringing manner, through their
28 various services. *See, e.g.*, Table 1 (below).

26. On information and belief, through these services, Defendants provide and distribute instructions—including but not limited to user guides, manuals, trainings, service portals, and other instructions—that guide users to use the Accused Products in an infringing manner. *See, e.g.*, Table 1 (below).

27. For example, on information and belief, and based on public information, Defendants own, operate, direct, and are responsible for the websites <https://www.linksys.com/>, <https://support.linksys.com/home/>, <https://www.belkin.com/>, and <https://www.belkin.com/support-product/>. *See, e.g.*, Table 1 (below).

28. On information and belief, and based on public information, through these websites, Defendants provide and distribute instructions that guide users to use the Accused Products in an infringing manner. *See, e.g.*, **Table 1** (below).

Table 1

| <i>Product Description</i> | <i>Product Name / No.</i> | |
|--------------------------------------|--|--|
| Whole Home Mesh Wi-Fi systems | Atlas Max 6E - MX8503 | <ul style="list-style-type: none"> https://www.belkin.com/support-product/?sku=MX8503 User Guide, https://fcc.report/FCC-ID/K7S-03685/5177186; Contact Authorization, https://fcc.report/FCC-ID/K7S-03685/5325787 (“I, the undersigned, Jay Tu, hereby authorize the person listed below to act in behalf of me to sign all related documents for Belkin International, Inc. ’s FCC application”) User Guide, https://fcc.report/FCC-ID/K7S-03685/5177186 (“© 2021 Belkin International, Inc. and/or its affiliates. All rights reserved”) https://support.linksys.com/kb/article/11-en/ |
| | Atlas Max 6E - MX8502 | <ul style="list-style-type: none"> https://www.belkin.com/support-product/?sku=MX8502 User Guide, https://fcc.report/FCC-ID/K7S-03685/5177186 https://support.linksys.com/kb/article/11-en/ |

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| Product Description | Product Name / No. | |
|----------------------------|---------------------------------------|--|
| | Atlas Pro 6 - MX5503 | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=MX5503 • User Guide, https://fcc.report/FCC-ID/K7S-03685/5177186 • https://support.linksys.com/kb/article/523-en/ |
| | Atlas Pro 6 - MX5502 | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=MX5502 • https://support.linksys.com/kb/article/523-en/ |
| | MX12600 | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=MX12600 • https://support.linksys.com/kb/article/112-en/ |
| | MX8400C | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=MX8400C • https://support.linksys.com/kb/article/112-en/ |
| | MX4200 | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=MX4200 • https://support.linksys.com/kb/article/112-en/ |
| Routers | Hydra Pro 6 - EMR7500 | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=MR7500 • https://support.linksys.com/kb/article/953-en/ |
| | Hydra Pro 6 - MR5500 | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=MR5500 • https://support.linksys.com/kb/article/207-en/ |
| | Max-Stream - EA7450 | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=EA7450 • https://support.linksys.com/kb/article/558-en/ |
| | Max-Stream - MR7350 | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=MR7350; • https://downloads.linksys.com/support/assets/userguide/USER%20GUIDE%20-%20MR7300%20Series%20-%20INTL_B00.pdf • https://support.linksys.com/kb/article/3 |

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| Product Description | Product Name / No. | |
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| | Hydra 6 - MR20EC | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=MR20EC; • https://support.linksys.com/kb/article/949-en/ |
| | E8450 - Dual-Band AX3200 Wi-Fi 6 Router | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=E8450 • https://www.belkin.com/support-product/?sku=RT3200 • https://support.linksys.com/kb/article/504-en/ |
| | E7350 - Dual-Band AX1800 Wi-Fi 6 Router | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=E7350 • https://www.belkin.com/support-product/?sku=RT1800 • https://downloads.linksys.com/support/assets/userguide/E7350_USERGUIDE_INTL_LNKPG-00727_RevB00.pdf • https://support.linksys.com/kb/article/545-en/ |
| Range Extenders | RE7350 - Dual-Band Wi-Fi 6 Range Extender (AX1800) | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=RE7350 • https://support.linksys.com/kb/article/3529-en/ |
| | RE6300 AC750 BOOST Wi-Fi Extender | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=RE6300; • Cover Letter, https://fccid.io/Q87-RE6300/Letter/Cover-Letter-Agent-Authorization-2752141; • https://support.linksys.com/kb/article/5057-en/ |
| | RE7310 - Dual-Band Wi-Fi 6 Range Extender (AX1800) | <ul style="list-style-type: none"> • https://www.belkin.com/support-product/?sku=RE7310; • https://support.linksys.com/kb/article/882-en/; • https://support.linksys.com/kb/article/885-en/ |
| Speaker + Charger | SoundForm Elite | <ul style="list-style-type: none"> • https://www.belkin.com/hi-fi-smart-speaker-wireless-charger/P-G1S0001.html |

| <i>Product Description</i> | <i>Product Name / No.</i> | |
|----------------------------|--|---|
| Smart Doorbells | Wemo Smart Video Doorbell - WDC010 | <ul style="list-style-type: none"> • https://www.belkin.com/support-article/?articleNum=318643 |

NOTICE

29. Belkin was notified that the Accused Products infringe the Asserted Patents by a letter in February of 2024.

30. On information and belief, Belkin has been aware of the Asserted Patents and Defendants’ infringement thereof since at least February 2024, when it received FCS’s notice letter.

31. On information and belief, Linksys has been aware of the Asserted Patents and Defendants’ infringement thereof since at least the date it received notice of the filing of this action, and no later than the date FCS filed its First Amended Complaint.

32. For these reasons and the additional reasons detailed below, the Accused Products practice at least one claim of each of the Asserted Patents.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,549,583

33. FCS repeats and re-alleges the allegations in Paragraphs above as though fully set forth in their entirety.

34. The USPTO duly issued U.S. Patent No. 6,549,583 (the “’583 patent”) on April 15, 2003, after full and fair examination of Application No. 09/790,429 which was filed February 21, 2001. The ’583 patent is entitled “Optimum Phase Error Metric for OFDM Pilot Tone Tracking in Wireless LAN.”

35. FCS owns all substantial rights, interest, and title in and to the ’583 patent, including the sole and exclusive right to prosecute this action and enforce the ’583 patent against infringers and to collect damages for all relevant times.

36. The claims of the ’583 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed

1 inventions include inventive components that improve upon the function and
2 operation of preexisting error estimation methods.

3 37. The written description of the '583 patent describes in technical detail
4 each limitation of the claims, allowing a skilled artisan to understand the scope of
5 the claims and how the non-conventional and non-generic combination of claim
6 limitations is patently distinct from and improved upon what may have been
7 considered conventional or generic in the art at the time of the invention.

8 38. FCS or its predecessors-in-interest have satisfied all statutory obligations
9 required to collect pre-filing damages for the full period allowed by law for
10 infringement of the '583 patent.

11 39. Defendants have directly infringed the claims of the '583 patent by
12 manufacturing, providing, supplying, using, distributing, selling, or offering to sell
13 the Accused Products.¹ For instance, Defendants have directly infringed, either
14 literally or under the doctrine of equivalents, at least claim 1 of the '583 patent. As
15 just one example of infringement, Defendants, using the Accused Products, perform
16 a method of pilot phase error estimation in an orthogonal frequency division
17 multiplexed (OFDM) receiver. The method includes determining pilot reference
18 points corresponding to a plurality of pilots of an OFDM preamble waveform; and
19 estimating an aggregate phase error of a subsequent OFDM data symbol relative to
20 the pilot reference points using complex signal measurements corresponding to each
21 of the plurality of pilots of the subsequent OFDM data symbol and the pilot reference
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23 ¹ Only Belkin is accused of infringement related to the Sound Form Elite and Wemo
24 Smart Video Doorbell. Moreover, Belkin is accused of infringement only to the
25 extent that, at the beginning of the relevant period for damages here, they used,
26 made, offered for sale, and/or sold, and/or to the extent they continue to maintain
27 ownership, possession, or control or retained liability associated with any portion of
28 sales in 2018-2019 related to the Atlas Max 6E - MX8503, Atlas Max 6E - MX8502,
Atlas Pro 6 - MX5503, Atlas Pro 6 - MX5502, MX12600, MX8400C, MX4200,
Hydra Pro 6 - EMR7500, Hydra Pro 6 - MR5500, Max-Stream - EA7450, Max-
Stream - MR7350, Hydra 6 - MR20EC, E8450 - Dual-Band AX3200 Wi-Fi 6
Router, E7350 - Dual-Band AX1800 Wi-Fi 6 Router, Dual-Band Wi-Fi 6 Range
Extender (AX1800), RE6300 AC750 BOOST Wi-Fi Extender, and RE7310 - Dual-
Band Wi-Fi 6 Range Extender (AX1800).

1 points; wherein the estimating step comprises performing a maximum likelihood-
2 based estimation using the complex signal measurements corresponding to each of
3 the plurality of pilots of the subsequent OFDM data symbol and the pilot reference
4 points. *See* '583 Evidence of Use Charts, attached hereto as **Exhibit A**.

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

9 **COUNT II: INFRINGEMENT OF U.S. PATENT NO. 6,633,616**

10 41. FCS repeats and re-alleges the allegations in Paragraphs above as though
11 fully set forth in their entirety.

12 42. The USPTO duly issued U.S. Patent No. 6,633,616 (the "'616 patent") on
13 October 14, 2003, after full and fair examination of Application No. 09/935,081
14 which was filed August 21, 2001. The '616 patent is entitled "OFDM Pilot Tone
15 Tracking for Wireless LAN."

16 43. FCS owns all substantial rights, interest, and title in and to the '616 patent,
17 including the sole and exclusive right to prosecute this action and enforce the '616
18 patent against infringers and to collect damages for all relevant times.

19 44. The claims of the '616 patent are not directed to an abstract idea and are
20 not limited to well-understood, routine, or conventional activity. Rather, the claimed
21 inventions include inventive components that improve upon the function and
22 operation of preexisting error estimation methods.

23 45. The written description of the '616 patent describes in technical detail
24 each limitation of the claims, allowing a skilled artisan to understand the scope of
25 the claims and how the non-conventional and non-generic combination of claim
26 limitations is patently distinct from and improved upon what may have been
27 considered conventional or generic in the art at the time of the invention.
28

1 46. FCS or its predecessors-in-interest have satisfied all statutory obligations
2 required to collect pre-filing damages for the full period allowed by law for
3 infringement of the '616 patent.

4 47. Defendants have directly infringed the claims of the '616 patent by
5 manufacturing, providing, supplying, using, distributing, selling, or offering to sell
6 the Accused Products.² For instance, Defendants have directly infringed, either
7 literally or under the doctrine of equivalents, at least claim 12 of the '616 patent. As
8 just one example of infringement, Defendants, using the Accused Products, perform
9 a method of pilot phase error estimation in an orthogonal frequency division
10 multiplexed (OFDM) receiver. The method includes determining pilot reference
11 points corresponding to a plurality of pilots of an OFDM preamble waveform;
12 processing, in a parallel path to the determining step, the OFDM preamble waveform
13 with a fast Fourier transform; determining a phase error estimate of a subsequent
14 OFDM symbol relative to the pilot reference points; and processing, in the parallel
15 path to the determining step, the subsequent OFDM symbol with the fast Fourier
16 transform; wherein the determining the phase error estimate step is completed prior
17 to the completion of the processing of the subsequent OFDM symbol with the fast
18 Fourier transform in the parallel path. *See* '616 Evidence of Use Charts attached
19 hereto as **Exhibit B**.

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

24 **COUNT III: INFRINGEMENT OF U.S. PATENT NO. 7,058,040**

25 49. FCS repeats and re-alleges the allegations in the Paragraphs above as
26 though fully set forth in their entirety.

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² *Supra*, nn.1.

1 50. The USPTO duly issued U.S. Patent No. 7,058,040 (the “’040 patent”) on
2 June 6, 2006, after full and fair examination of Application No. 09/962,718 which
3 was filed September 21, 2001. The ’040 patent is entitled “Channel Interference
4 Reduction.”

5 51. FCS owns all substantial rights, interest, and title in and to the ’040 patent,
6 including the sole and exclusive right to prosecute this action and enforce the ’040
7 patent against infringers and to collect damages for all relevant times.

8 52. The claims of the ’040 patent are not directed to an abstract idea and are
9 not limited to well-understood, routine, or conventional activity. Rather, the claimed
10 inventions include inventive components that improve upon the function and
11 operation of preexisting data transmission methods.

12 53. The written description of the ’040 patent describes in technical detail
13 each limitation of the claims, allowing a skilled artisan to understand the scope of
14 the claims and how the non-conventional and non-generic combination of claim
15 limitations is patently distinct from and improved upon what may have been
16 considered conventional or generic in the art at the time of the invention.

17 54. FCS or its predecessors-in-interest have satisfied all statutory obligations
18 required to collect pre-filing damages for the full period allowed by law for
19 infringement of the ’040 patent.

20 55. Defendants have directly infringed and continued to directly infringe the
21 claims of the ’040 patent through the end of its term by manufacturing, providing,
22 supplying, using, distributing, selling, or offering to sell the Accused Products.³ For
23 instance, Defendants have directly infringed and continued to directly infringe,
24 either literally or under the doctrine of equivalents, at least claim 1 of the ’040 patent
25 through the end of its term. As just one example of infringement, Defendants, using
26 the Accused Products, performed a method for data transmission over first and
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28 ³ *Supra*, nn.1.

1 second media that overlap in frequency. The method included computing one or
2 more time division multiple access (TDMA) time-slot channels to be shared between
3 the first and second media for data transmission; allocating one or more time-slot
4 channels to the first medium for data transmission; allocating one or more of the
5 remaining time-slot channels to the second medium for data transmission; and
6 dynamically adjusting a number of timeslot channels assigned to one of the first and
7 second media during the data transmission to remain within limits of a desired level
8 of service. *See* '040 Evidence of Use Chart attached hereto as **Exhibit C**.

9 56. Defendants have indirectly infringed and continued to indirectly infringe
10 the '040 patent through the end of its term by inducing others to directly infringe the
11 '040 patent. Defendants have induced and continued to induce customers and end-
12 users, including, but not limited to, Defendants' customers, employees, partners, or
13 contractors, to directly infringe, either literally or under the doctrine of equivalents,
14 the '040 patent by providing or requiring use of the Accused Products. Defendants
15 have taken active steps, directly or through contractual relationships with others,
16 with the specific intent to cause them to use the Accused Products in a manner that
17 infringes one or more claims of the '040 patent, including, for example, claim 1.
18 Such steps by Defendants have included, among other things, advising or directing
19 customers, personnel, contractors, or end-users to use the Accused Products in an
20 infringing manner; advertising and promoting the use of the Accused Products in an
21 infringing manner; or distributing instructions that guide users to use the Accused
22 Products in an infringing manner. Defendants had been performing these steps,
23 which constitute induced infringement with the knowledge of the '040 patent and
24 with the knowledge that the induced acts constitute infringement. Defendants have
25 been aware that the normal and customary use of the Accused Products by others
26 would infringe the '040 patent. Defendants' inducement is ongoing.

27 57. Defendants have indirectly infringed and continued to indirectly infringe
28 by contributing to the infringement of the '040 patent through the end of its term.

1 Defendants have contributed and continued to contribute to the direct infringement
2 of the '040 patent by its customers, personnel, and contractors. The Accused
3 Products have special features that are specially designed to be used in an infringing
4 way and that have no substantial uses other than ones that infringe one or more
5 claims of the '040 patent, including, for example, claim 1. The special features
6 constitute a material part of the invention of one or more of the claims of the '040
7 patent and are not staple articles of commerce suitable for substantial non-infringing
8 use. Defendants' contributory infringement of the '040 patent was ongoing through
9 the end of its term.

10 58. Belkin had knowledge of its infringement of the '040 patent at least as of
11 February of 2024, when it received FCS's notice letter. Linksys had knowledge of
12 its infringement of the '040 patent since at least the date it received notice of the
13 filing of this action, and no later than the date FCS filed its First Amended
14 Complaint.

15 59. Furthermore, on information and belief, Defendants have a policy or
16 practice of not reviewing the patents of others, including instructing its employees
17 to not review the patents of others, and thus have been willfully blind of FCS's patent
18 rights.

19 60. Defendants' actions were at least objectively reckless as to the risk of
20 infringing a valid patent and this objective risk was either known or should have
21 been known by Defendants.

22 61. Defendants' infringement of the '040 patent is, has been, and continued
23 to be willful, intentional, deliberate, or in conscious disregard of FCS's rights under
24 the '040 patent through the end of its term.

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

1 **COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 7,260,153**

2 63. FCS repeats and re-alleges the allegations in the Paragraphs above as
3 though fully set forth in their entirety.

4 64. The USPTO duly issued U.S. Patent No. 7,260,153 (the “’153 patent”) on
5 August 21, 2007, after full and fair examination of Application No. 10/423,447,
6 which was filed on April 28, 2003. The ’153 patent is entitled “Multi Input Multi
7 Output Wireless Communication Method and Apparatus Providing Extended Range
8 and Extended Rate Across Imperfectly Estimated Channels.”

9 65. FCS owns all substantial rights, interest, and title in and to the ’153 patent,
10 including the sole and exclusive right to prosecute this action and enforce the ’153
11 patent against infringers and to collect damages for all relevant times.

12 66. The claims of the ’153 patent are not directed to an abstract idea and are
13 not limited to well-understood, routine, or conventional activity. Rather, the claimed
14 inventions include inventive components that improve upon the function and
15 operation of voice and data communications systems.

16 67. The written description of the ’153 patent describes in technical detail
17 each limitation of the claims, allowing a skilled artisan to understand the scope of
18 the claims and how the non-conventional and non-generic combination of claim
19 limitations is patently distinct from and improved upon what may have been
20 considered conventional or generic in the art at the time of the invention.

21 68. Defendants have directly infringed and continues to directly infringe the
22 claims of the ’153 patent by importing, selling, manufacturing, offering to sell,
23 using, providing, supplying, or distributing the Accused Products.⁴ For instance,
24 Defendants have directly infringed and continues to directly infringe, either literally
25 or under the doctrine of equivalents, at least claim 1 of the ’153 patent. As just one
26 example of infringement, Defendants, using the Accused Products, perform a
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28 ⁴ *Supra*, nn.1.

1 method for evaluating a channel of a multiple-input multiple-output (“MIMO”)
2 wireless communication system allowing two or more communication devices with
3 multiple radiating elements to transmit parallel data sub-streams which defines a
4 channel matrix metric of cross-talk signal-to-noise (“SNR”) for the subs-streams,
5 estimates the channel matrix metric, performs a singular value decomposition
6 (“SVD”) of the channel matrix metric estimate to calculate estimated channel
7 singular values, and using the channel matrix metric and estimated channel singular
8 values to calculate a crosstalk measure for the sub-streams. *See* ’153 Evidence of
9 Use Charts attached hereto as **Exhibit D**.

10 69. Defendants have also indirectly infringed and continues to indirectly
11 infringe the ’153 patent by inducing others to directly infringe the ’153 patent.
12 Defendants have induced distributors and end-users, including, but not limited to,
13 Defendants’ employees, partners, contractors, or customers, to directly infringe,
14 either literally or under the doctrine of equivalents, the ’153 patent by providing or
15 requiring use of the Accused Products. Defendants took active steps, directly or
16 through contractual relationships with others, with the specific intent to cause them
17 to use the Accused Products in a manner that infringes one or more claims of the
18 ’153 patent, including, for example, claim 1 of the ’153 patent. Such steps by
19 Defendants include, among other things, advising or directing personnel,
20 contractors, or end-users to use the Accused Products in an infringing manner;
21 advertising and promoting the use of the Accused Products in an infringing manner;
22 or distributing instructions that guide users to use the Accused Products in an
23 infringing manner. Defendants are performing these steps, which constitute induced
24 infringement with the knowledge of the ’153 patent and with the knowledge that the
25 induced acts constitute infringement. Defendants are aware that the normal and
26 customary use of the Accused Products by others would infringe the ’153 patent.
27 Defendants’ inducement is ongoing.

28 70. Defendants have also indirectly infringed and continues to indirectly

1 infringe by contributing to the infringement of the '153 patent. Defendants have
2 contributed to the direct infringement of the '153 patent by its personnel, contractors,
3 distributors, and customers. The Accused Products have special features that are
4 specially designed to be used in an infringing way and that have no substantial uses
5 other than ones that infringe one or more claims of the '153 patent, including, for
6 example, claim 1 of the '153 patent. The special features constitute a material part
7 of the invention of one or more of the claims of the '153 patent and are not staple
8 articles of commerce suitable for substantial non-infringing use. Defendants'
9 contributory infringement is ongoing.

10 71. Belkin had knowledge of its infringement of the '153 patent at least as of
11 February of 2024, when it received FCS's notice letter. Linksys had knowledge of
12 its infringement of the '153 patent since at least the date it received notice of the
13 filing of this action, and no later than the date FCS filed its First Amended
14 Complaint.

15 72. Furthermore, on information and belief, Defendants have a policy or
16 practice of not reviewing the patents of others, including instructing its employees
17 to not review the patents of others, and thus has been willfully blind of FCS's patent
18 rights.

19 73. Defendants' actions are at least objectively reckless as to the risk of
20 infringing a valid patent and this objective risk was either known or should have
21 been known by Defendants.

22 74. Defendants' direct infringement of the '153 patent is, has been, and
23 continues to be willful, intentional, deliberate, or in conscious disregard of FCS's
24 rights under the patent.

25 75. FCS or its predecessors-in-interest have satisfied all statutory obligations
26 required to collect pre-filing damages for the full period allowed by law for
27 infringement of the '153 patent.

28 76. FCS has been damaged as a result of the infringing conduct by Defendants

1 alleged above. Thus, Defendants are liable to FCS in an amount that compensates
2 it for such infringements, which by law cannot be less than a reasonable royalty,
3 together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

4 77. FCS has suffered irreparable harm, through its loss of market share and
5 goodwill, for which there is no adequate remedy at law. FCS has and will continue
6 to suffer this harm by virtue of Defendants' infringement of the '153 patent.
7 Defendants' actions have interfered with and will interfere with FCS's ability to
8 license technology. The balance of hardships favors FCS's ability to commercialize
9 its own ideas and technology. The public interest in allowing FCS to enforce its
10 right to exclude outweighs other public interests, which supports injunctive relief in
11 this case.

12 **COUNT V: INFRINGEMENT OF U.S. PATENT NO. 7,656,845**

13 78. FCS repeats and re-alleges the allegations in the Paragraphs above as
14 though fully set forth in their entirety.

15 79. The USPTO duly issued U.S. Patent No. 7,656,845 (the "'845 patent") on
16 February 2, 2010 after full and fair examination of Application No. 11/402,172
17 which was filed on April 11, 2006. The '845 patent is entitled "Channel Interference
18 Reduction." A Certificate of Correction was issued on November 30, 2010.

19 80. FCS owns all substantial rights, interest, and title in and to the '845 patent,
20 including the sole and exclusive right to prosecute this action and enforce the '845
21 patent against infringers and to collect damages for all relevant times.

22 81. The claims of the '845 patent are not directed to an abstract idea and are
23 not limited to well-understood, routine, or conventional activity. Rather, the claimed
24 inventions include inventive components that improve upon the function and
25 operation of preexisting systems and methods of wireless communication with a
26 mobile unit.

27 82. The written description of the '845 patent describes in technical detail
28 each limitation of the claims, allowing a skilled artisan to understand the scope of

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

4 83. Defendants have directly infringed and continued to directly infringe the
5 claims of the '845 patent through the end of its term by importing, selling,
6 manufacturing, offering to sell, using, providing, supplying, or distributing the
7 Accused Products.⁵ For instance, Defendants have directly infringed and continued
8 to directly infringe, either literally or under the doctrine of equivalents, at least claim
9 1 of the '845 patent through the end of its term. As just one example of infringement,
10 Defendants use the Accused Products to perform a method comprising a base station
11 allocating at least one of a plurality of data channels to a first medium for data
12 transmission via a wireless device; the base station allocating at least one remaining
13 data channel of the plurality of data channels to a second medium for data
14 transmission via the wireless device; and the base station dynamically adjusting,
15 during data transmission, a number of the data channels assigned to one of the first
16 and second media to remain within limits of a desired level of service. *See* '845
17 Evidence of Use Chart attached hereto as **Exhibit E**.

18 84. Defendants have also indirectly infringed and continued to indirectly
19 infringe the '845 patent the end of its term by inducing others to directly infringe the
20 '845 patent. Defendants have induced distributors and end-users, including, but not
21 limited to, Defendants' employees, partners, contractors, or customers, to directly
22 infringe, either literally or under the doctrine of equivalents, the '845 patent by
23 providing or requiring use of the Accused Products. Defendants took active steps,
24 directly or through contractual relationships with others, with the specific intent to
25 cause them to use the Accused Products in a manner that infringes one or more
26 claims of the '845 patent, including, for example, claim 1 of the '845 patent. Such
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28 ⁵ *Supra*, nn.1.

1 steps by Defendants include, among other things, advising or directing personnel,
2 contractors, or end-users to use the Accused Products in an infringing manner;
3 advertising and promoting the use of the Accused Products in an infringing manner;
4 or distributing instructions that guide users to use the Accused Products in an
5 infringing manner. Defendants performed these steps, which constitute induced
6 infringement with the knowledge of the '845 patent and with the knowledge that the
7 induced acts constitute infringement. Defendants are aware that the normal and
8 customary use of the Accused Products by others would infringe the '845 patent.
9 Defendants' inducement is ongoing.

10 85. Defendants have also indirectly infringed and continued to indirectly
11 infringe by contributing to the infringement of the '845 patent through the end of its
12 term. Defendants have contributed to the direct infringement of the '845 patent by
13 its personnel, contractors, distributors, and customers. The Accused Products have
14 special features that are specially designed to be used in an infringing way and that
15 have no substantial uses other than ones that infringe one or more claims of the '845
16 patent, including, for example, claim 1 of the '845 patent. The special features
17 constitute a material part of the invention of one or more of the claims of the '845
18 patent and are not staple articles of commerce suitable for substantial non-infringing
19 use. Defendants' contributory infringement of the '845 patent was ongoing through
20 the end of its term.

21 86. Belkin had knowledge of its infringement of the '845 patent at least as of
22 February of 2024, when it received FCS's notice letter. Linksys had knowledge of
23 its infringement of the '845 patent since at least the date it received notice of the
24 filing of this action, and no later than the date FCS filed its First Amended
25 Complaint.

26 87. Furthermore, on information and belief, Defendants have a policy or
27 practice of not reviewing the patents of others, including instructing its employees
28 to not review the patents of others, and thus has been willfully blind of FCS's patent

1 rights.

2 88. Defendants' actions are at least objectively reckless as to the risk of
3 infringing a valid patent and this objective risk was either known or should have
4 been known by Defendants.

5 89. Defendants' direct infringement of the '845 patent is, has been, and
6 continued to be willful, intentional, deliberate, or in conscious disregard of FCS's
7 rights under the patent '845 patent through the end of its term.

8 90. FCS or its predecessors-in-interest have satisfied all statutory obligations
9 required to collect pre-filing damages for the full period allowed by law for
10 infringement of the '845 patent.

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

15 **COUNT VI: INFRINGEMENT OF U.S. PATENT NO. 7,742,388**

16 92. FCS repeats and re-alleges the allegations in the Paragraphs above as
17 though fully set forth in their entirety.

18 93. The USPTO duly issued U.S. Patent No. 7,742,388 (the "'388 patent") on
19 June 22, 2010, after full and fair examination of Application No. 11/185,665 which
20 was filed July 20, 2005. The '388 patent is entitled "Packet Generation Systems and
21 Methods."

22 94. FCS owns all substantial rights, interest, and title in and to the '388 patent,
23 including the sole and exclusive right to prosecute this action and enforce the '388
24 patent against infringers and to collect damages for all relevant times.

25 95. The claims of the '388 patent are not directed to an abstract idea and are
26 not limited to well-understood, routine, or conventional activity. Rather, the claimed
27 inventions include inventive components that improve upon the function and
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1 operation of preexisting systems and methods of generating packets in a digital
2 communications system.

3 96. The written description of the '388 patent describes in technical detail
4 each limitation of the claims, allowing a skilled artisan to understand the scope of
5 the claims and how the non-conventional and non-generic combination of claim
6 limitations is patently distinct from and improved upon what may have been
7 considered conventional or generic in the art at the time of the invention.

8 97. FCS or its predecessors-in-interest have satisfied all statutory obligations
9 required to collect pre-filing damages for the full period allowed by law for
10 infringement of the '388 patent.

11 98. Defendants have directly infringed and continues to directly infringe the
12 claims of the '388 patent by manufacturing, providing, supplying, using,
13 distributing, selling, or offering to sell the Accused Products.⁶ For instance,
14 Defendants have directly infringed and continues to directly infringe, either literally
15 or under the doctrine of equivalents, at least claim 1 of the '388 patent. As just one
16 example of infringement, Defendants performs a method including generating a
17 packet with a size corresponding to a protocol used for a network transmission,
18 wherein the packet comprises a preamble having a first training symbol and a second
19 training symbol. The method further includes increasing the size of the packet by
20 adding subcarriers to the second training symbol of the packet to produce an
21 extended packet, wherein a quantity of subcarriers of the second training symbol is
22 greater than a quantity of subcarriers of the first training symbol; and transmitting
23 the extended packet from an antenna. *See* '388 Evidence of Use Charts attached
24 hereto as **Exhibit F**.

25 99. Defendants have indirectly infringed and continues to indirectly infringe
26 the '388 patent by inducing others to directly infringe the '388 patent. Defendants
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28 ⁶ *Supra*, nn.1.

1 have induced and continue to induce customers and end-users, including, but not
2 limited to, Defendants' customers, employees, partners, or contractors, to directly
3 infringe, either literally or under the doctrine of equivalents, the '388 patent by
4 providing or requiring use of the Accused Products. Defendants have taken active
5 steps, directly or through contractual relationships with others, with the specific
6 intent to cause them to use the Accused Products in a manner that infringes one or
7 more claims of the '388 patent, including, for example, claim 1. Such steps by
8 Defendants have included, among other things, advising or directing customers,
9 personnel, contractors, or end-users to use the Accused Products in an infringing
10 manner; advertising and promoting the use of the Accused Products in an infringing
11 manner; or distributing instructions that guide users to use the Accused Products in
12 an infringing manner. Defendants have been performing these steps, which
13 constitute induced infringement with the knowledge of the '388 patent and with the
14 knowledge that the induced acts constitute infringement. Defendants have been
15 aware that the normal and customary use of the Accused Products by others would
16 infringe the '388 patent. Defendants' inducement is ongoing.

17 100. Defendants have indirectly infringed and continues to indirectly infringe
18 by contributing to the infringement of the '388 patent. Defendants have contributed
19 and continues to contribute to the direct infringement of the '388 patent by its
20 customers, personnel, and contractors. The Accused Products have special features
21 that are specially designed to be used in an infringing way and that have no
22 substantial uses other than ones that infringe one or more claims of the '388 patent,
23 including, for example, claim 1. The special features constitute a material part of
24 the invention of one or more of the claims of the '388 patent and are not staple
25 articles of commerce suitable for substantial non-infringing use. Defendants'
26 contributory infringement is ongoing.

27 101. Belkin had knowledge of its infringement of the '388 patent at least as of
28 February of 2024, when it received FCS's notice letter. Linksys had knowledge of

1 its infringement of the '388 patent since at least the date it received notice of the
2 filing of this action, and no later than the date FCS filed its First Amended
3 Complaint.

4 102. Furthermore, on information and belief, Defendants have a policy or
5 practice of not reviewing the patents of others, including instructing its employees
6 to not review the patents of others, and thus have been willfully blind of FCS's patent
7 rights.

8 103. Defendants' actions are at least objectively reckless as to the risk of
9 infringing a valid patent and this objective risk was either known or should have
10 been known by Defendants.

11 104. Defendants' infringement of the '388 patent is, has been, and continues to
12 be willful, intentional, deliberate, or in conscious disregard of FCS's rights under
13 the patent.

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

18 106. FCS has suffered irreparable harm, through its loss of market share and
19 goodwill, for which there is no adequate remedy at law. FCS has and will continue
20 to suffer this harm by virtue of Defendants' infringement of the '388 patent.
21 Defendants' actions have interfered with and will interfere with FCS's ability to
22 license technology. The balance of hardships favors FCS's ability to commercialize
23 its own ideas and technology. The public interest in allowing FCS to enforce its
24 right to exclude outweighs other public interests, which supports injunctive relief in
25 this case.

26 **COUNT VII: INFRINGEMENT OF U.S. PATENT NO. 8,005,053**

27 107. FCS repeats and re-alleges the allegations in the Paragraphs above as
28 though fully set forth in their entirety.

1 108. The USPTO duly issued U.S. Patent No. 8,005,053 (the “’053 patent”) on
2 August 23, 2011, after full and fair examination of Application No. 12/696,760,
3 which was filed on January 29, 2010. The ’053 patent is entitled “Channel
4 Interference Reduction.”

5 109. FCS owns all substantial rights, interest, and title in and to the ’053 patent,
6 including the sole and exclusive right to prosecute this action and enforce the ’053
7 patent against infringers and to collect damages for all relevant times.

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

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

17 112. Defendants have directly infringed the claims of the ’053 patent by
18 importing, selling, manufacturing, offering to sell, using, providing, supplying, or
19 distributing the Accused Products.⁷ For instance, Defendants have directly
20 infringed, either literally or under the doctrine of equivalents, at least claim 1 of the
21 ’053 patent.

22 113. As just one example of infringement, the Accused Products, used by
23 Defendants, comprise a first wireless transceiver configured to communicate data
24 according to a first wireless protocol; a second wireless transceiver configured to
25 communicate data according to a second wireless protocol that is different from the
26 first wireless protocol, a controller configured to select one of the first and second
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28 ⁷ *Supra*, nn.1.

1 wireless transceivers to communicate data of both the first and second wireless
2 protocols, and wherein the apparatus is configured to encode data of the wireless
3 protocol for the unselected transceiver into data of the wireless protocol for the
4 selected transceiver. *See* '053 Evidence of Use Charts attached hereto as **Exhibit G**.

5 114. FCS or its predecessors-in-interest have satisfied all statutory obligations
6 required to collect pre-filing damages for the full period allowed by law for
7 infringement of the '053 patent.

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

12 **JURY DEMAND**

13 116. FCS hereby requests a trial by jury on all issues so triable by right.

14 **PRAYER FOR RELIEF**

15 117. FCS requests that the Court find in its favor and against Defendants, and
16 that the Court grant FCS the following relief:

- 17 a. Judgment that one or more claims of each of the Asserted Patents has been
18 infringed, either literally or under the doctrine of equivalents, by
19 Defendants or others acting in concert therewith;
- 20 b. A permanent injunction enjoining Defendants and their officers, directors,
21 agents, servants, affiliates, employees, divisions, branches, subsidiaries,
22 parents, and all others acting in concert therewith from infringement of
23 the '153 patent and the '388 patent; or, in the alternative, an award of a
24 reasonable ongoing royalty for future infringement of the Asserted Patents
25 by such entities;
- 26 c. Judgment that Defendants account for and pay to FCS all damages to and
27 costs incurred by FCS because of Defendants' infringing activities and
28 other conduct complained of herein;

- 1 d. Judgment that Defendants’ infringements of the ’040 patent, the ’153
- 2 patent, the ’845 patent, and the ’388 patent be found willful, and that the
- 3 Court award treble damages for the period of such willful infringement
- 4 pursuant to 35 U.S.C. § 284;
- 5 e. Pre-judgment and post-judgment interest on the damages caused by
- 6 Defendants’ infringing activities and other conduct complained of herein;
- 7 f. That this Court declare this an exceptional case and award FCS its
- 8 reasonable attorneys’ fees and costs in accordance with 35 U.S.C. § 285;
- 9 and
- 10 g. All other and further relief as the Court may deem just and proper under
- 11 the circumstances.

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1 Dated: November 25, 2024

Respectfully submitted,

2 By: /s/ Travis E. Lynch

3 Travis E. Lynch (SBN 335684)
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8 Email: lynch@RHMtrial.com

Attorneys for Plaintiff Fleet Connect Solutions LLC

8 **List of Exhibits**

- 9 A. Evidence of Use Chart for US Patent 6,549,583
- 10 B. Evidence of Use Chart for US Patent 6,633,616
- 11 C. Evidence of Use Chart for US Patent 7,058,040
- 12 D. Evidence of Use Chart for US Patent 7,260,153
- 13 E. Evidence of Use Chart for US Patent 7,656,845
- 14 F. Evidence of Use Chart for US Patent 7,742,388
- 15 G. Evidence of Use Chart for US Patent 8,005,053

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on this day, November 25, 2024, I electronically filed
16 the foregoing First Amended Complaint for Patent Infringement with the Clerk of
17 the Court for the United States District Court for the Central District of California
18 by using the Court’s CM/ECF system.

19 By: /s/ Travis E. Lynch