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3 UNITED STATES DISTRICT COURT  
4 FOR THE WESTERN DISTRICT OF WASHINGTON  
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6 **Vortical Systems LLC,**

7 **Plaintiff,**

8 **v.**

9 **Freely Systems Inc.,**

10 **Defendant.**  
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CASE NO. 2:25-CV-0520

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

## COMPLAINT FOR PATENT INFRINGEMENT

1           1.     Plaintiff Vortical Systems LLC (“Plaintiff”), through its attorneys,  
2 complains of Freely Systems Inc. (“Defendant”), and alleges the following:  
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### PARTIES

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5           2.     Plaintiff Vortical Systems LLC is a corporation organized and existing  
6 under the laws of NM that maintains its principal place of business at 1209  
7 Mountain Rd Pl NE STE n, Albuquerque, NM 87110.  
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10           3.     Defendant Freely Systems Inc. is a corporation organized and  
11 existing under the laws of WA that maintains an established place of business at  
12 15540 Woodinville Redmond Rd. NE, Ste A800, Woodinville, WA 98072.  
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### JURISDICTION

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15           4.     This is an action for patent infringement arising under the patent laws  
16 of the United States, Title 35 of the United States Code.  
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18           5.     This Court has exclusive subject matter jurisdiction under 28 U.S.C.  
19 §§ 1331 and 1338(a).  
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21           6.     This Court has personal jurisdiction over Defendant because it has  
22 engaged in systematic and continuous business activities in this District. As  
23 described below, Defendant has committed acts of patent infringement giving rise  
24 to this action within this District.  
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**VENUE**

1 7. Venue is proper in this District under 28 U.S.C. § 1400(b) because  
2 Defendant has an established place of business in this District. In addition,  
3 Defendant has committed acts of patent infringement in this District, and Plaintiff  
4 has suffered harm in this district.  
5

**PATENT -IN -SUIT**

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8 8. Plaintiff is the assignee of all right, title and interest in United States  
9 Patent No. 7,231,294 (the “Patent-in-Suit”); including all rights to enforce and  
10 prosecute actions for infringement and to collect damages for all relevant times  
11 against infringers of the Patent-in-Suit. Accordingly, Plaintiff possesses the  
12 exclusive right and standing to prosecute the present action for infringement of the  
13 Patent-in-Suit by Defendant.  
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**THE '294 PATENT**

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18 9. The '294 Patent is entitled “Navigating a UAV,” and issued 2007-06-  
19 12. The application leading to the '294 Patent was filed on 2003-10-23. A true and  
20 correct copy of the '294 Patent is attached hereto as Exhibit 1 and incorporated  
21 herein by reference.  
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**COUNT 1: INFRINGEMENT OF THE '294 PATENT**

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25 10. Plaintiff incorporates the above paragraphs herein by reference.  
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11. **Direct Infringement.** Defendant has been and continues to directly  
1 infringe one or more claims of the '294 Patent in at least this District by making,  
2 using, offering to sell, selling and/or importing, without limitation, at least the  
3 Defendant products identified in the charts incorporated into this Count below  
4 (among the "Exemplary Defendant Products") that infringe at least the exemplary  
5 claims of the '294 Patent also identified in the charts incorporated into this Count  
6 below (the "Exemplary '294 Patent Claims") literally or by the doctrine of  
7 equivalents. On information and belief, numerous other devices that infringe the  
8 claims of the '294 Patent have been made, used, sold, imported, and offered for  
9 sale by Defendant and/or its customers.  
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13 12. Defendant also has and continues to directly infringe, literally or  
14 under the doctrine of equivalents, the Exemplary '294 Patent Claims, by having its  
15 employees internally test and use these Exemplary Products.  
16

17 13. **Actual Knowledge of Infringement.** The service of this Complaint,  
18 in conjunction with the attached claim charts and references cited, constitutes  
19 actual knowledge of infringement as alleged here.  
20

21 14. Despite such actual knowledge, Defendant continues to make, use,  
22 test, sell, offer for sale, market, and/or import into the United States, products that  
23 infringe the '294 Patent. On information and belief, Defendant has also continued  
24 to sell the Exemplary Defendant Products and distribute product literature and  
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website materials inducing end users and others to use its products in the customary and intended manner that infringes the '294 Patent. See Exhibit 2 (extensively referencing these materials to demonstrate how they direct end users to commit patent infringement).

15. **Induced Infringement.** At least since being served by this Complaint and corresponding claim charts, Defendant has actively, knowingly, and intentionally continued to induce infringement of the '294 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to their customers for use in end-user products in a manner that infringes one or more claims of the '294 Patent.

16. Exhibit 2 includes charts comparing the Exemplary '294 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '294 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '294 Patent Claims.

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

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

**JURY DEMAND**

1           19. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff  
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3 respectfully requests a trial by jury on all issues so triable.

**PRAYER FOR RELIEF**

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7           WHEREFORE, Plaintiff respectfully requests the following relief:

8           A. A judgment that the '294 Patent is valid and enforceable;;

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10           B. A judgment that Defendant has infringed directly and indirectly  
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12 one or more claims of the '294 Patent;

13           C. An accounting of all damages not presented at trial;

14           D. A judgment that awards Plaintiff all appropriate damages under  
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16 35 U.S.C. § 284 for Defendant's continuing or future infringement, up until  
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18 the date such judgment is entered with respect to the '294 Patent, including  
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20 pre- or post-judgment interest, costs, and disbursements as justified under 35  
21  
22 U.S.C. § 284;

23           E. And, if necessary, to adequately compensate Plaintiff for  
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25 Defendant's infringement, an accounting:

1 i. that this case be declared exceptional within the meaning of 35  
2 U.S.C. § 285 and that Plaintiff be awarded its reasonable attorneys' fees  
3 against Defendant that it incurs in prosecuting this action;

4 ii. that Plaintiff be awarded costs, and expenses that it incurs in  
5 prosecuting this action; and  
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7 iii. that Plaintiff be awarded such further relief at law or in equity  
8 as the Court deems just and proper.  
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10 DATED this 24<sup>th</sup> day of March, 2025.  
11

12 By: s/ Philip P. Mann  
13 Philip P. Mann, WSBA No. 28860  
14 **MANN LAW GROUP PLLC**  
15 403 Madison Ave. N. Ste. 240  
16 Bainbridge Island, WA 98110  
17 Telephone: (206) 436-0900  
18 email: [phil@mannlawgroup.com](mailto:phil@mannlawgroup.com)

19 Together with:

20 Isaac Rabicoff (*pro hac forthcoming*)  
21 **Rabicoff Law LLC**  
22 4311 N Ravenswood Ave Suite 315  
23 Chicago, IL 60613  
24 Telephone: (773) 669-4590  
25 Email: [isaac@rabilaw.com](mailto:isaac@rabilaw.com)

26 **Counsel for Plaintiff**  
27 **Vortical Systems LLC**  
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