

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ARRIVALSTAR S.A. and MELVINO	)	
TECHNOLOGIES LIMITED,	)	
	)	
Plaintiffs,	)	<b>Case No.: 10-cv-02296</b>
	)	
vs.	)	
	)	
BSM WIRELESS, CALAMP CORP.,	)	
INTERNATIONAL TELEMATICS	)	
CORPORATION, CROWLEY LINER	)	
SERVICES, INC., INTEGRATED SYSTEM	)	<b>DEMAND FOR JURY TRIAL</b>
RESEARCH CORPORATION, MIX	)	
TELEMATICS NORTH AMERICA, INC.,	)	
PROCON, INC., ROCKY MOUNTAIN	)	
TRACKING, INC., and TRACKN, INC.	)	
	)	
Defendants.	)	
	)	

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiffs ArrivalStar S.A. and Melvino Technologies Limited (collectively, “ArrivalStar” or “Plaintiffs”), by and through their undersigned attorneys, for their complaint against defendants BSM Wireless (“BSM”), CalAmp Corp. (“CalAmp”), Crowley Liner Services, Inc. (“Crowley”), International Telematics Corporation (“International Telematics”), Integrated System Research Corporation (“ISR”), MiX Telematics North America, Inc. (“Mix Telematics”), PROCON, Inc. (“PROCON”), Rocky Mountain Tracking, Inc. (“RMT”), and Trackn, Inc. (“Trackn”) (BSM, CalAmp, Crowley, International Telematics, ISR, Mix Telematics, PROCON, RMT, and Trackn are collectively referred to herein as “Defendants”) hereby allege as follows:

### **NATURE OF LAWSUIT**

1. This action involves claims for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. § 1338(a).

### **THE PARTIES**

2. ArrivalStar S.A. is a corporation organized under the laws of Luxembourg and having offices at 67 Rue Michel, Welter L-2730, Luxembourg.

3. Melvino Technologies Limited is a corporation organized under the laws of the British Virgin Island of Tortola, having offices at P.O. Box 3152, RG Hodge Building, Road Town, Tortola, British Virgin Islands.

4. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 6,278,936 (“the ‘936 patent”), entitled “System and method for an advance notification system for monitoring and reporting proximity of a vehicle,” issued August 21, 2001. A copy of the ‘936 patent is annexed hereto as Exhibit A.

5. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 6,618,668 (“the ‘668 patent”), entitled “System and method for obtaining vehicle schedule information in an advance notification system,” issued September 9, 2003. A copy of the ‘668 patent is annexed hereto as Exhibit B.

6. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 6,714,859 (“the ‘859 patent”), entitled “System and method for an advance notification system for monitoring and reporting proximity of a vehicle,” issued March 30, 2004. A copy of the ‘859 patent is annexed hereto as Exhibit C.

7. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 6,741,927 (“the ‘927 patent”), entitled “User-definable communications methods and systems,” issued May 25, 2004. A copy of the ‘927 patent is annexed hereto as Exhibit D.

8. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 6,804,606 (“the ‘606 patent”), entitled “Notification systems and methods with user-definable notifications based upon vehicle proximities,” issued October 12, 2004. A copy of the ‘606 patent is annexed hereto as Exhibit E.

9. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 6,904,359 (“the ‘359 patent”), entitled “Notification systems and methods with user-definable notifications based upon occurrence of events,” issued June 7, 2005. A copy of the ‘359 patent is annexed hereto as Exhibit F. The ‘359 patent has been reexamined by the U.S. Patent and Trademark Office in *Inter Partes* reexamination no. 95/000,369. A copy of the allowed reexamined claims of the ‘359 patent are annexed hereto as Exhibit G. A copy of the Notice of Intent to Issue a Reexam Certificate is annexed hereto as Exhibit H.

10. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 6,952,645 (“the ‘645 patent”), entitled “System and method for activation of an advance notification system for monitoring and reporting status of vehicle travel,” issued October 4, 2005. A copy of the ‘645 patent is annexed hereto as Exhibit I.

11. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 7,030,781 (“the ‘781 patent”), entitled “Notification

system and method that informs a party of vehicle delay,” issued April 18, 2006. A copy of the ‘781 patent is annexed hereto as Exhibit J.

12. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 7,191,058 (“the ‘058 patent”), entitled “Notification systems and methods enabling user entry of notification trigger information based upon monitored mobile vehicle location,” issued March 13, 2007. A copy of the ‘058 patent is annexed hereto as Exhibit K.

13. Defendant BSM is a Canadian Corporation with a place of business at 5875 Hwy 7, Suite 200, Woodbridge, Ontario Canada L4L 1T9. BSM transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Illinois services that infringe claims of the ‘936, ‘668, ‘859, ‘606, ‘359, ‘645, and ‘058 patents.

14. Defendant CalAmp is a Delaware Corporation with a place of business at 1401 N. Rice Ave., Oxnard, California 93030. CalAmp transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Illinois services that infringe claims of the ‘936, ‘927, ‘859, and ‘058 patents.

15. Defendant Crowley is a Delaware Corporation with a place of business at 2250 Point Blvd. Suite 340, Elgin, Illinois 60123. Crowley transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Illinois services that infringe claims of the ‘859, ‘645, and ‘781 patents.

16. Defendant International Telematics is a Delaware Corporation with a place of business at 311 West 43rd St. Suite 304, New York, New York, 10036. International Telematics transacts business and has, at a minimum, offered to provide and/or provided in

this judicial district and throughout the State of Illinois services that infringe claims of the '936, '859, '606, '359, '645, and '058 patents.

17. Defendant ISR is a California Corporation with a place of business at 1502 Joh Avenue, Suite 170, Baltimore, Maryland 21227. ISR transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Illinois services that infringe claims of the '936, '859, '927, '606, '359, '645, and '058 patents.

18. Defendant MiX Telematics is a Texas Corporation with a place of business at 401 E. Corporate Dr. Suite 146, Lewisville, Texas 75057. MiX Telematics transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Illinois services that infringe claims of the '936, '859, '927, '606, '359, '645, and '058 patents.

19. Defendant PROCON is a Tennessee Corporation with a place of business at 2035 Lakeside Centre Way, Suite 125, Knoxville, Tennessee 37922. PROCON transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Illinois services that infringe claims of the '936, '859, '927, '606, '359, '645, and '058 patents.

20. Defendant RMT is a Colorado Corporation with a place of business at 149 W. Harvard St., Suite 401, Fort Collins, Colorado 80525. RMT transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Illinois services that infringe claims of the '936, '668, '859, '606, '359, '645, '781, and '058 patents.

21. Defendant Trackn is a California Corporation with a place of business at 33 Hammond St, Ste. 201, Irvine, California, 92618. Trackn transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Illinois services that infringe claims of the '936, '859, '927, '606, '359, '645, and '058 patents.

22. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).

**DEFENDANT BSM'S ACTS OF PATENT INFRINGEMENT**

23. Defendant BSM has infringed claims of the '936, '668, '859, '606, '359, '645, and '058 patents through, among other activities, the use of BSM's Sentinel FM vehicle tracking system. BSM has also infringed the '936, '668, '859, '606, '359, '645, and '058 patents by knowingly and actively inducing others to infringe and by contributing to the infringement by others of, such patents.

24. BSM's Sentinel FM system is a fleet monitoring application that enables real-time vehicle tracking by users.

25. BSM's vehicle tracking system allows users to view the status of a fleet of vehicles directly on a map and obtain detailed information about the fleet.

26. BSM's tracking system receives data from mobile vehicles.

27. BSM's vehicle tracking system actively tracks the locations of mobile vehicles.

28. BSM's tracking system obtains location information from GPS instrumentation aboard vehicles via cellular communication systems.

29. BSM's tracking systems notify users when a vehicle enters within a user designated boundary.

30. BSM's promotional literature claims that the Sentinel FM system allows users to "create circular or polygonal zones, and get notified instantly when your asset enters or exits the area."

31. BSM's tracking system is configured to transmit alert notifications regarding a fleet or specific vehicle to people who were entered in an email list for alarm notifications for that fleet or that specific vehicle.

32. BSM's vehicle tracking system automatically transmits a notification via a user-specified method to a user upon a user-specified vehicle entering within a user-specified boundary around a user-specified location.

33. BSM provides users with mapping tools to define circular proximities around geographic locations.

34. BSM's mapping systems are configured to enable a user to set geofence boundaries about a location.

35. BSM's vehicle tracking system allows users to specify a location and receive a notification when a vehicle is within a user-defined proximity of the location.

36. BSM's vehicle tracking system is configured to enable a user to define multiple proximities about a location.

37. BSM's systems allow a user to define multiple areas around a location.

38. BSM's tracking system allows users to assign alerts to specific vehicles.

39. Defendant BSM's infringement, contributory infringement and inducement to infringe has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of

methods and systems that come within the scope of the '936, '668, '859, '606, '359, '645, and '058 patents.

**DEFENDANT CALAMP'S ACTS OF PATENT INFRINGEMENT**

40. Defendant CalAmp has infringed claims of the '936, '927, '859, and '058 patents through, among other activities, the use of CalAmp's Aercept vehicle tracking system. CalAmp has also infringed the '936, '927, '859, and '058 patents by knowingly and actively inducing others to infringe and by contributing to the infringement by others of, such patents.

41. CalAmp's tracking system conveys notifications to users that indicate a mobile vehicle's current location.

42. CalAmp's vehicle tracking system transmits notifications to users' general-purpose computers.

43. CalAmp's Aercept tracking system is configured to automatically notify users when user specified vehicle related events occur.

44. CalAmp's automated tracking system transmits messages to user telephone interfaces upon receiving location data indicative of a vehicle entering within a user selected distance of a location.

45. CalAmp's tracking system is configured to enable a user to assign a location event alert to a vehicle that is remote from the user.

46. CalAmp's tracking system transmits graphical maps to users' via email.

47. CalAmp's tracking system provides graphical maps to users in emails sent in response to a vehicle arriving within geofenced areas.



48. CalAmp's tracking system has been configured to enable a user to elect to receive event notifications at multiple telephone interfaces.

49. CalAmp's tracking system notifies users of exception events with graphical maps, emails, and SMS text messages.

50. CalAmp's tracking system has been configured to enable a user to elect to receive an alert message at a telephone interface upon a vehicle entering within a geofence proximity of a location between 9 A.M. and 5 P.M., and a second alert message at an email address upon the vehicle entering within the geofence proximity of the location between 5 P.M. and 10 P.M.

51. CalAmp's tracking system monitors vehicles and transmits alerts to users using user-preferred methods for a user specified time period upon a vehicle entering within a predetermined proximity of a location.

52. Defendant CalAmp's infringement, contributory infringement and inducement to infringe has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the '936, '927, '859, and '058 patents.

**DEFENDANT CROWLEY'S ACTS OF PATENT INFRINGEMENT**

53. Defendant Crowley has infringed claims of the '859, '645, and '781 patents through, among other activities, the use of Crowley's e-Freight Management vehicle tracking system. Crowley has also infringed the '859, '645, and '781 patents by knowingly and actively inducing others to infringe and by contributing to the infringement by others of, such patents.

54. Crowley's tracking system provides users with alert notifications.

55. Crowley's tracking system is configured to allow users to configure alerts that are created upon occurrence of an exception.

56. Crowley's tracking system is allows users to receive e-mail alerts on every status change, including "received by carrier," "at sea," and "delivered."

57. Crowley's tracking system is configured to monitor ships traveling along predetermined routes.

58. Crowley's tracking system provides users with proactive identification of delivery status and estimated time of arrival information for vehicles.

59. Crowley's tracking system receives requests from users that messages be transmitted in response to a ship sailing from a port towards a destination.

60. Defendant Crowley's infringement, contributory infringement and inducement to infringe has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the '859, '645, and '781 patents.

**DEFENDANT INTERNATIONAL TELEMATICS'**  
**ACTS OF PATENT INFRINGEMENT**

61. Defendant International Telematics has infringed claims of the '936, '859, '606, '359, '645, and '058 patents through, among other activities, the use of International Telematics' vehicle tracking systems. International Telematics has also infringed the '936, '859, '606, '359, '645, and '058 patents by knowingly and actively inducing others to infringe and by contributing to the infringement by others of, such patents.

62. International Telematics provides users with an automatic vehicle location service.

63. International Telematics' ibright tracking system receives location data from on board vehicle tracking devices, and transmits alert information to users.

64. International Telematics' tracking systems notify users when a user defined exception condition occurs.

65. International Telematics' ibright tracking system includes geofence functionality.

66. International Telematics' systems are configured to send SMS text message notifications to users.

67. International Telematics' vehicle tracking system transmits alert messages to users' personal communication devices.

68. International Telematics' tracking system transmits alert messages to users indicating a vehicle's proximity to a location.

69. International Telematics' ibright tracking system is user configurable to automatically transmit an alert message to a user upon a vehicle entering within a boundary area around a location.

70. International Telematics provides users with perimeter alerts that provide automatic notifications when vehicles cross outside of user defined geocorridors.

71. International Telematics' tracking system is configured to send email notifications to users when the tracking system receives travel data from a vehicle indicative of the vehicle entering within a user-defined area.

72. International Telematics' tracking systems provide users with display maps that indicate the current location of tracked vehicles.

73. Defendant International Telematics' infringement, contributory infringement and inducement to infringe has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the '936, '859, '606, '359, '645, and '058 patents.

**DEFENDANT ISR'S ACTS OF PATENT INFRINGEMENT**

74. Defendant ISR has infringed claims of the '936, '859, '927, '606, '359, '645, and '058 patents through, among other activities, the use of ISR's FleetTrack vehicle tracking system. ISR has also infringed the '936, '859, '927, '606, '359, '645, and '058 patents by knowingly and actively inducing others to infringe and by contributing to the infringement by others of, such patents.

75. ISR's vehicle tracking system receives location data from vehicles.

76. ISR's FleetTrack system provides users with automatic updates of tracking information through exception-based reporting.

77. ISR's vehicle tracking system retrieves stored vehicle travel data upon user request.

78. ISR's FleetTrack system transmits notifications to users based upon the occurrence of user defined trigger conditions.

79. ISR's vehicle tracking system transmits alert messages to users that indicate the locations of vehicles.

80. ISR's tracking systems allow a user to set alarms for vehicles that are remotely located from the user.

81. ISR provides users with mapping tools to define circular proximities around geographic locations.

82. ISR's tracking system monitors vehicles and transmits alerts to users using user-preferred methods for user-specified time period upon a vehicle entering within a predetermined proximity of a location.

83. ISR's tracking system allows users to define time periods in which a specific vehicle entering within a geofence area will cause an alert notification to be generated.

84. ISR's tracking system has been configured to enable a user to elect to receive an alert message at a first pager upon a vehicle entering within a geofence proximity of a location between 9 A.M. and 5 P.M., and a second alert message at a second pager upon the vehicle entering within the geofence proximity of the location between 5 P.M. and 10 P.M.

85. ISR's tracking systems provide users with graphical maps that include symbolic representations of mobile vehicles.

86. ISR's tracking systems provide a user with a vehicle's proximity to a location.

87. ISR's vehicle tracking system is configured to enable a user to define multiple proximities about a location.

88. Defendant ISR's infringement, contributory infringement and inducement to infringe has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the '936, '859, '927, '606, '359, '645, and '058 patents.

**DEFENDANT MIX TELEMATICS' ACTS OF PATENT INFRINGEMENT**

89. Defendant MiX Telematics has infringed claims of the '936, '859, '927, '606, '359, '645, and '058 patents through, among other activities, the use of MiX Telematics' vehicle tracking systems. MiX Telematics has also infringed the '936, '859, '927, '606, '359, '645, and '058 patents by knowingly and actively inducing others to infringe and by contributing to the infringement by others of, such patents.

90. MiX Telematics' FM-Protector system monitors vehicles and reports vehicle status information to users.

91. Mix Telematics' vehicle tracking systems monitor travel data sent from vehicles.

92. In response to user requests, the Mix Telematics systems retrieve and monitor travel data sent from vehicles.

93. MiX Telematics' tracking system is configured to store data transmitted from vehicles.

94. MiX Telematics' system is configured to provide a user with a graphical map.

95. MiX Telematics' tracking system receives requests from users that are sufficient to identify a vehicle.

96. MiX Telematics' vehicle tracking system is configured to transmit alerts to users' computers via email.

97. MiX Telematics' tracking system is configured to transmit alerts when a vehicle is within a geofence proximity of a location.

98. MiX Telematics' tracking systems allow users to define a distance, up to 30 km, from a location.

99. MiX Telematics' tracking system allows users to define a plurality of proximities around a location.

100. MiX Telematics' tracking systems are configured to analyze vehicle travel data and transmit an alert notification when a vehicle is within a geofence proximity of a location.

101. MiX Telematics' tracking systems are configured to transmit alerts to users' telephones.

102. MiX Telematics' tracking system provides graphical maps to users' telephones.

103. MiX Telematics' Vehicle Profile Manager allows a user to select a vehicle via an alphanumeric identifier.

104. MiX Telematics' tracking system allows a user to select a geographic location by clicking on a map.

105. MiX Telematics' tracking system allows a user to select a geographic location by clicking on a map, and the MiX Telematics system translates the location into Latitude and Longitude coordinate values.

106. The MiX Telematics FM 4310i tracking device is configured to determine its location and transmit travel data indicative of its location via a wireless system.

107. MiX Telematics' tracking system compares travel data produced by a FM 4310i to a stored location value and determines if the vehicle is within a predefined geofence proximity to a location.

108. MiX Telematics' system allows users to define when they are to receive alert notifications relating to a mobile vehicle.

109. MiX Telematics' system allows users to define events that will cause an alert notification to be transmitted.

110. MiX Telematics' tracking system sends alerts to users indicating that a vehicle is within the geofence proximity of a location.

111. MiX Telematics' system stores email addresses provided by users and transmits alert notifications to the users via the provided email addresses.

112. MiX Telematics' tracking system is configured to enable users to log into the vehicle tracking system and elect to receive alarm notifications during selected time periods.

113. During user specified time periods, the MiX Telematics tracking system transmits alerts, via user defined methods, to a user to indicate that a vehicle is within a user defined distance of a user defined location.

114. Defendant Mix Telematics' infringement, contributory infringement and inducement to infringe has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the '936, '859, '927, '606, '359, '645, and '058 patents.

**DEFENDANT PROCON'S ACTS OF PATENT INFRINGEMENT**

115. Defendant PROCON has infringed claims of the '936, '859, '927, '606, '359, '645, and '058 patents through, among other activities, the use of PROCON's SAT Track GPS, SAT Track Fleet GPS, GoldStar GPS, and Contractor GPS tracking systems. PROCON has also infringed the '936, '859, '927, '606, '359, '645, and '058 patents by knowingly and actively inducing others to infringe and by contributing to the infringement by others of, such patents.



116. PROCON's vehicle tracking systems monitor the location of mobile vehicles.

117. PROCON's vehicle tracking systems are configured to obtain location information transmitted from GPS tracking devices.

118. PROCON's vehicle tracking systems transmit notifications to users' personal computers via email.

119. PROCON's vehicle tracking systems transmit alert notifications to users when a monitored vehicle arrives within a user-specified distance of a geographic location.

120. PROCON's tracking systems allow users to set up alerts and specify the recipients of the alerts.

121. PROCON's tracking systems allow users to set up alerts for vehicles and specify the time periods that the alerts are active.

122. PROCON's vehicle tracking systems store vehicle travel data and are configured to display 30 minutes of historical vehicle data on a graphical map as a bread crumb trail.

123. PROCON's vehicle tracking systems are configured to enable a user to specify a distance, in miles, from a location.

124. PROCON's tracking systems are configured to enable a user to define a landmark at a vehicle's location by selecting the vehicle on a graphical map.

125. PROCON's tracking systems include a routing panel that allows users to define waypoint landmarks along a vehicle's route.

126. PROCON's tracking systems allow a landmark to be used as a geofence by setting the landmark to have a perimeter around it.

127. PROCON's tracking systems allow users to specify the days of the week that a geofence entry by a vehicle will cause an alert to be generated.

128. PROCON's tracking systems allow users to specify the times of day that a geofence entry by a vehicle will cause an alert to be generated.

129. PROCON's systems are configured to transmit notifications to multiple email addresses for each alert event.

130. PROCON's vehicle tracking systems transmit notifications to telephones via SMS text messages.

131. PROCON's vehicle tracking systems are configured to automatically transmit notification messages to users based upon vehicles entering within user-specified areas around locations.

132. PROCON's vehicle tracking systems are configured to enable a user to define a circular perimeter about a location.

133. PROCON's vehicle tracking systems have been configured to enable a user to specify multiple boundary areas around a location.

134. PROCON's systems are configured to enable a user to assign a geofence boundary around a location to a specific vehicle, and receive an alert when the vehicle enters within the boundary.

135. PROCON's vehicle tracking systems are configured to enable a user to elect to receive a SMS text message upon a vehicle entering within a perimeter around a landmark between 9 A.M. and 5 P.M., and an email upon the vehicle entering within the perimeter around the landmark between 5 P.M. and 9 A.M.

136. PROCON's vehicle tracking systems are configured to monitor vehicles' locations and transmit alert notifications to users using user-selected methods associated with a time period when the monitored vehicles are within a user-specified proximity of a location.

137. PROCON's vehicle tracking systems are configured to transmit a graphical map to a user device, wherein the map includes a symbolic representation of a tracked vehicle enroute to a destination.

138. Defendant PROCON's infringement, contributory infringement and inducement to infringe has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the '936, '859, '927, '606, '359, '645, and '058 patents.

#### **DEFENDANT RMT'S ACTS OF PATENT INFRINGEMENT**

139. Defendant RMT has infringed claims of the '936, '668, '859, '606, '359, '645, '781, and '058 patents through, among other activities, the use of RMT's NavIQ vehicle tracking system. RMT has also infringed the '936, '668, '859, '606, '359, '645, '781, and '058 patents by knowingly and actively inducing others to infringe and by contributing to the infringement by others of, such patents.

140. RMT's vehicle tracking systems actively track the locations of vehicles.

141. RMT's tracking systems receive location data from vehicles via cellular communication networks.

142. RMT's vehicle tracking system is configured to ping tracking devices in response to a user request to locate a vehicle.

143. RMT's vehicle tracking systems are configured to poll tracking devices aboard vehicles for current location information upon a user request.

144. RMT's tracking systems have stored historical vehicle location data.

145. RMT's NavIQ system provides users with real-time notifications of user-specified vehicle locations and conditions.

146. RMT's NavIQ system transmits alerts via email messages in response to a vehicle achieving a user-defined condition.

147. RMT's tracking systems are configured to alert users with an audible sound upon a vehicle entering within geofence.

148. RMT's NavIQ system allows users to establish an alert zone that triggers a notification when a specified vehicle enters the alert zone.

149. RMT's tracking system provides users with email notifications of exceptions that include entering a geofence area and exiting a geofence area.

150. RMT's tracking systems are configured to enable a user to define multiple geofences for a vehicle.

151. RMT's vehicle tracking systems are configured to enable a user to specify a distance from a location.

152. RMT's vehicle tracking systems are configured to enable a user to specify a distance from a location by clicking and dragging a cursor on a graphical map.

153. RMT's vehicle tracking systems are configured to receive requests from users that an alert be transmitted in response to a user-specified vehicle entering within a user-specified distance of a location.

154. RMT's vehicle tracking systems are configured to enable a user to define multiple distances from a location.

155. RMT's tracking systems allow users to assign geofence alert areas to specific tracking devices.

156. RMT's vehicle tracking systems are configurable to automatically transmit an alert to a user upon a vehicle entering within a predetermined proximity of a user-specified location.

157. RMT's vehicle tracking systems transmit maps to a user computer, and the maps indicate a vehicle's current location.

158. Defendant RMT's infringement, contributory infringement and inducement to infringe has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the '936, '668, '859, '606, '359, '645, '781, and '058 patents.

**DEFENDANT TRACKN'S ACTS OF PATENT INFRINGEMENT**

159. Defendant Trackn has infringed claims of the '936, '859, '927, '606, '359, '645, and '058 patents through, among other activities, the use of Trackn's vehicle tracking system. Trackn has also infringed the '936, '859, '927, '606, '359, '645, and '058 patents by knowingly and actively inducing others to infringe and by contributing to the infringement by others of, such patents.

160. Trackn's tracking system receives location data from remote mobile vehicles.

161. Trackn's tracking system receives alert preferences associated with mobile vehicles from users located remote from the mobile vehicles.

162. Trackn's tracking system actively monitors the position of vehicles.

163. Trackn's tracking system allows a user to specify a location by Latitude and Longitude coordinates.

164. Trackn's tracking system allows a user to specify a location on a graphical map and the tracking system assigns Latitude and Longitude coordinates to the location.

165. Trackn's vehicle tracking system is configured to enable users to specify a distance, in miles, from the center of a circular geofence.

166. Trackn's vehicle tracking system transmits notifications to users that indicate a vehicle's current location.

167. Trackn's vehicle tracking system automatically associates geographic locations with data in a format compatible with location data produced by a GPS tracking device aboard a vehicle.

168. Trackn's tracking system allows users to define an electronic circular fence around the location of a vehicle.

169. Trackn's tracking system allows users to specify circular geographic areas on a map with a radius extending from a point.

170. Trackn's vehicle tracking system is configurable to automatically transmit a notification to a user when a vehicle arrives within a predetermined distance of a location.

171. Trackn's tracking system transmits notifications when vehicles enter within geofence areas designated by a user.

172. Trackn's system transmits notifications when vehicles approach user assigned areas.

173. Trackn's tracking system is configured to enable users to designate multiple circular areas around a geographic point.

174. Trackn's vehicle tracking system notifies users of impending arrivals of vehicles at destinations by monitoring the movement of the vehicles and transmitting email notifications to the users when the vehicles enter within predetermined proximities of the destinations.

175. Trackn's vehicle tracking system provides alert notifications via email and SMS text messages.

176. Trackn's tracking system monitors vehicles and transmits alerts to users using user-preferred methods for user-specified time periods upon a vehicle entering within a predetermined proximity of a location.

177. Trackn's system enables users to specify time periods when a user is to receive alert notifications based upon the location of vehicles.

178. Defendant Trackn's infringement, contributory infringement and inducement to infringe has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the '936, '859, '927, '606, '359, '645, and '058 patents.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs ask this Court to enter judgment against the Defendants, and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

- A. An award of damages adequate to compensate ArrivalStar for the infringement that has occurred, together with prejudgment interest from the date that Defendant's infringement of the ArrivalStar patents began;
- B. Increased damages as permitted under 35 U.S.C. § 284;
- C. A finding that this case is exceptional and an award to ArrivalStar of its attorneys' fees and costs as provided by 35 U.S.C. § 285;
- D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the ArrivalStar patents; and
- E. Such other and further relief as this Court or a jury may deem proper and just.

**JURY DEMAND**

ArrivalStar demands a trial by jury on all issues presented in this Complaint.

Dated: April 14, 2010

Respectfully submitted,

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