

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

PJC LOGISTICS, LLC,

Plaintiff

v.

Civil Case No. 11-cv-1983

A&R LOGISTICS, INC.; ACE HARDWARE CORPORATION; ALLIED VAN LINES, INC.; ATLAS VAN LINES, INC.; BEST WAY EXPRESS, INC.; BULKMATIC TRANSPORT COMPANY; CARDINAL TRANSPORT, INC.; CARTER EXPRESS, INC.; CELADON GROUP, INC.; CENTRAL TRANSPORT NORTH AMERICA, INC.; CON-WAY FREIGHT, INC.; CON-WAY, INC.; DAWES TRANSPORT, INC.; deBOER TRANSPORTATION, INC.; DO IT BEST CORP.; DOHRN TRANSFER COMPANY; EARL L. HENDERSON TRUCKING COMPANY; EQUITY TRANSPORTATION COMPANY, INC.; G & F TRUCKING LEASING, INC.; GULLY TRANSPORTATION, INC.; H.O. WOLDING, INC.; JBS LOGISTICS, INC.; JOHNSON TRUCKING OF NEENAH, INC.; MARTEN TRANSPORTS, LLC; THE MASON AND DIXON LINES, INCORPORATED; NORTH AMERICAN VAN LINES, INC.; ORMSBY TRUCKING, INC.; POINT DEDICATED SERVICES, LLC; R&M TRUCKING CO.; ROADRUNNER TRANSPORTATION SERVICES, INC.; ROEHL TRANSPORT, INC.; RUSH TRUCKING CORPORATION; SCHNEIDER NATIONAL CARRIERS, INC.; STANDARD FORWARDING, LLC; SUPER SERVICE, LLC; THOMASON EXPRESS, LLC; TRANSPORTATION SERVICES, INC. (TSI); UNIVERSAL TRUCKLOAD SERVICES, INC.; USF HOLLAND, INC.; and VENTURE LOGISTICS SERVICES, INC.

Defendants.

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff PJC Logistics LLC (“PJC Logistics” or “Plaintiff), by way of Complaint against defendants A&R Logistics, Inc.; Ace Hardware Corporation; Allied Van Lines, Inc.; Atlas Van Lines, Inc.; Best Way Express, Inc.; Bulkmatic Transport Company; Cardinal Transport, Inc.; Carter Express, Inc.; Celadon Group, Inc.; Central Transport North America, Inc.; Con-Way Freight, Inc.; Con-Way, Inc.; Dawes Transport, Inc.; deBoer Transportation, Inc.; Do It Best Corp.; Dohrn Transfer Company; Earl L. Henderson Trucking Company; Equity Transportation Company, Inc.; G & F Trucking Leasing, Inc.; Gully Transportation, Inc.; H.O. Wolding, Inc.; JBS Logistics, Inc.; Johnson Trucking of Neenah, Inc.; Marten Transports, LLC; The Mason and Dixon Lines, Incorporated; North American Van Lines, Inc.; Ormsby Trucking, Inc.; Point Dedicated Services, LLC; R&M Trucking Co.; Roadrunner Transportation Systems; Roehl Transport, Inc.; Rush Trucking Corporation; Schneider National Carriers, Inc.; Standard Forwarding, LLC; Super Service, LLC; Thomason Express, LLC; Transportation Services, Inc. (TSI); Universal Truckload Services, Inc.; USF Holland, Inc.; and Venture Logistics Services, Inc., hereby alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 101, *et seq.*

THE PARTIES

2. Plaintiff PJC Logistics is a limited liability corporation organized under the laws of Texas with its principal place of business at 777 Enterprise Drive, Hewitt, Texas 76643.

3. Defendant A&R Logistics, Inc. is a corporation organized under the laws of Illinois with its principal place of business at 8440 Tabler Road, Morris, IL 60450, and a registered agent for service of process at Mark R. Raymond, 1515 E. Woodfield Rd., 2nd Floor, Schaumburg, IL 60173.

4. Defendant Ace Hardware Corporation is a corporation organized under the laws of Delaware with its principal place of business at 2200 Kensington Ct., Oak Brooks, IL 60523, and a registered agent for service of process at Illinois Corporation Service Company, 801 Adlai Stevenson Drive, Springfield, IL 62703.

5. Defendant Allied Van Lines, Inc. is a corporation organized under the laws of Delaware with its principal place of business at 700 Oakmont Lane, Westmont, IL 60559, and a registered agent for service of process at Illinois Corporation Service Company, 801 Adlai Stevenson Drive, Springfield, IL 62703.

6. Defendant Atlas Van Lines, Inc. is a corporation organized under the laws of Delaware with its principal place of business at 1212 St. George Road, Evansville, IN 47711, and a registered agent for service of process at National Registered Agents, Inc., 200 West Adams Street, Chicago, IL 60606.

7. Defendant Best Way Express, Inc. is a corporation organized under the laws of Indiana with its principal place of business at 1640 N. Hillcrest Dr., Vincennes, IN 47591, and a registered agent for service of process at William Daniel Brejcha, 30 W. Monroe St., Suite 600, Chicago, IL 60603.

8. Defendant Bulkmatic Transport Company is a corporation organized under the laws of Illinois with its principal place of business at 2001 North Cline Avenue, Griffith, IN

46319, and a registered agent for service of process at John R. Obiala, 222 N. LaSalle St. Ste. 2600, Chicago, IL 60601.

9. Defendant Cardinal Transport, Inc. is a corporation organized under the laws of Delaware with its principal place of business at 7180 E. Reed Rd., Coal City, IL 60416, and a registered agent for service of process at Frank J. Cortina Jr., 124 West Washington Street, Morris, IL 60450.

10. Defendant Carter Express, Inc. is a corporation organized under the laws of Indiana with its principal place of business at 4020 West 73rd Street, Anderson, IN 46011, and it can be served with process at the same address.

11. Defendant Celadon Group, Inc. is a corporation organized under the laws of Delaware with its principal place of business at One Celadon Dr., 9503 E. 33rd St., Indianapolis, IN 46235, and it can be served with process at that address.

12. Defendant Central Transport North America, Inc. is a corporation organized under the laws of Michigan with its principal place of business at 12225 Stephens Road, Warren, MI 48089, and a registered agent for service of process at National Corporate Research, 520 S. Second St., Suite 403, Springfield, IL 62701.

13. Defendant Con-Way Freight, Inc. is a corporation organized under the laws of Delaware with its principal place of business at 2211 Old Earhart Road, Ann Arbor, Michigan 48105, and a registered agent for service of process at Prentice Hall Corporation, 33 North LaSalle Street, Chicago, IL 60602.

14. Defendant Con-Way, Inc. is a corporation organized under the laws of Delaware with its principal place of business at 2211 Old Earhart Road, Ann Arbor, Michigan 48105, and it can be served with process at that address.

15. Defendant Dawes Transport, Inc. is a corporation organized under the laws of Wisconsin with its principal place of business at 9160 North 107th Street, Milwaukee, Wisconsin 53224, and a registered agent for service of process at C T Corporation System, 208 S. LaSalle St, Suite 814, Chicago, Illinois 60604.

16. Defendant deBoer Transportation Inc. is a corporation organized under the laws of Wisconsin with its principal place of business at 8814 City Road F, P.O. Box 145, Blenker, WI 54415, and it can be served with process at that same address.

17. Defendant Do It Best Corp. is a corporation organized under the laws of Indiana with its principal place of business at 6502 Nelson Rd., P.O. Box 868, Fort Wayne, Indiana 46801, and a registered agent for service of process at Lonnie Carter, Progress Drive, Dixon, Illinois 61021.

18. Defendant Dohrn Transfer Company is a corporation organized under the laws of Illinois with its principal place of business at 15 Lake Lynnwood, Lynn Center, IL 61262, and a registered agent for service of process at Gary C. Dohrn, 625 Third Avenue, Rock Island, IL 61201.

19. Defendant Earl L. Henderson Trucking Company is a corporation organized under the laws of Illinois with its principal place of business at 3958 Cross Road, Salem, IL 62881, and a registered agent for service of process at Jeanne Skinner, #1 Industrial Park, Salem, IL 62881.

20. Defendant Equity Transportation Company, Inc. is a corporation organized under the laws of Michigan with its principal place of business at 3685 Dykstra Drive, NW, Walker, MI 49544, and a registered agent for service of process at Allert Cornelius Bishop, 1250 Rt. 34, Oswego, IL 60543.

21. Defendant G & F Trucking Leasing Inc. is a corporation organized under the laws of Indiana with its principal place of business at 16832 N. 100 W, Wheatfield, IN 46312, and a registered agent for service of process at CT Corporation System, 208 S. LaSalle St., Suite 814, Chicago, IL 60604.

22. Defendant Gully Transportation, Inc. is a corporation organized under the laws of Delaware with its principal place of business at 2436 Lake Drive North, Quincy, IL 62305, and a registered agent for service of process at William M. Gully, 3820 Wisman Lane, Quincy, Illinois 62301.

23. Defendant H.O. Wolding, Inc. is a corporation organized under the laws of Wisconsin with its principal place of business at 9110 County Hwy. SS, Nelsonville, WI 54458, and a registered agent for service of process at Daniel C. Sullivan, 120 W. 22nd St., Suite 100, Oakbrook, IL 60523.

24. Defendant JBS Logistics Inc. is a corporation organized under the laws of Illinois with its principal place of business at 30 W. 115 St. Andrew Lane W., Chicago, IL 60185, and a registered agent for service of process at Frances Bongiovanni, 108 Bokelman Street, Roselle, IL 60172.

25. Defendant Johnson Trucking of Neenah, Inc. is a corporation organized under the laws of Wisconsin with its principal place of business at 8420 Winncrest Road, Neenah, Wisconsin 54956, and it can be served with process at that address.

26. Defendant Marten Transports, LLC is a corporation organized under the laws of Illinois with its principal place of business at 1540 Robinson Hill Rd., Stonefort, IL 62987, and a registered agent for service of process at Joseph D. Martens, 1540 Robinson Hill Rd., Stonefort, IL 62987.

27. Defendant The Mason and Dixon Lines, Incorporated is a corporation organized under the laws of Michigan with its principal place of business at 12755 East Nine Mile Road, Warren, MI 48089, and a registered agent for service of process at C T Corporation System, 208 S. LaSalle St., Suite 814, Chicago, IL 60604.

28. Defendant North American Van Lines, Inc. is a corporation organized under the laws of Delaware with its principal place of business at 700 Oakmont Lane, Westmont, IL 60559, and a registered agent for service of process at Illinois Corporation Service Company, 801 Adlai Stevenson Drive, Springfield, IL 62703.

29. Defendant Ormsby Trucking, Inc. is a corporation organized under the laws of Indiana with its principal place of business at Box 67, Uniondale, IN 46791, and it can be served with process at that address.

30. Defendant Point Dedicated Services, LLC is a corporation organized under the laws of Michigan with its principal place of business at 1300 E Big Beaver Rd., Troy MI 48083, and it can be served with process at that address.

31. Defendant R&M Trucking Co. is a corporation organized under the laws of Illinois with its principal place of business at 3720 River Road, Suite 100, Franklin Park, IL 60131, and it can be served with process at that address.

32. Defendant Roadrunner Transportation Services, Inc. is a corporation organized under the laws of Delaware with its principal place of business at 4900 South Pennsylvania Avenue, Cudahy, WI 53110, and a registered agent for service of process at C T Corporation System, 208 S. LaSalle St, Suite 814, Chicago, Illinois 60604.

33. Defendant Roehl Transport, Inc. is a corporation organized under the laws of Wisconsin with its principal place of business at 1916 E. 29th Street, Marshfield, WI 54449, and it can be served with process at that address.

34. Defendant Rush Trucking Corporation is a corporation organized under the laws of Michigan with its principal place of business at 35160 E. Michigan Ave., Wayne, MI 48184, and a registered agent for service of process at Patrick H. Smyth, 105 W. Madison St., Ste. 901, Chicago, IL 60602.

35. Defendant Schneider National Carriers, Inc. is a corporation organized under the laws of Nevada with its principal place of business at 3101 Packerland Drive, Green Bay, WI 54313, and a registered agent for service of process at C T Corporation System, 600 S. 2nd St., Ste. 103, Springfield, IL 62704.

36. Defendant Standard Forwarding, LLC is a corporation organized under the laws of Delaware with its principal place of business at 2925 Morton Drive, East Moline, IL 61244, and a registered agent for service of process at Peter J. Benson, 3551 7th St., Moline, IL 61265.

37. Defendant Super Service, LLC is a corporation organized under the laws of Delaware with its principal place of business at 6000 Clay Ave. SW, Grand Rapids, MI 49548, and a registered agent for service of process at C T Corporation System, 208 S. LaSalle St., Suite 814, Chicago, IL 60604.

38. Defendant Thomason Express, LLC is a corporation organized under the laws of Illinois with its principal place of business at 1606 East Main Street, P.O. Box 910, Marion, IL 62959, and a registered agent for service of process at Lee R. Thomason, 14939 Rte. 13, Marion, IL 62959.

39. Defendant Transportation Services, Inc. (TSI) is a corporation organized under the laws of Michigan with its principal place of business at 18165 Telegraph Road, Romulus, MI 48174, and a registered agent for service of process at C T Corporation System, 208 S. LaSalle St., Suite 814, Chicago, IL 60604.

40. Defendant Universal Truckload Services, Inc. is a corporation organized under the laws of Michigan with its principal place of business at 12755 East Nine Mile Road, Warren, MI 48089, and it can be served with process at that same address.

41. Defendant USF Holland Inc. is a corporation organized under the laws of Michigan with its principal place of business at 10990 Roe Ave., Tax Dept., Overland Park, KS 66211, and a registered agent for service of process at C T Corporation System, 208 S. LaSalle St., Suite 814, Chicago, IL 60604.

42. Defendant Venture Logistics Services, Inc. is a corporation organized under the laws of Indiana with its principal place of business at 1101 Harding Court, Indianapolis, IN 46217, and it can be served with process at that same address.

JURISDICTION AND VENUE

43. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a). Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and 1400(b).

44. Defendant A&R Logistics, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in A&R Logistics, Inc.'s fleet of trucks, vans or

other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

45. Defendant Ace Hardware Corporation uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Ace Hardware Corporation's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

46. Defendant Allied Van Lines, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Allied Van Lines, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

47. Defendant Atlas Van Lines, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Atlas Van Lines, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

48. Defendant Best Way Express, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is

alleged below. Trucks, vans or other vehicles in Best Way Express, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

49. Defendant Bulkmatic Transport Company uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Bulkmatic Transport Company's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

50. Defendant Cardinal Transport, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Cardinal Transport, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

51. Defendant Carter Express, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Carter Express, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

52. Defendant Celadon Group, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and

tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Celadon Group, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

53. Defendant Central Transport North America, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Central Transport North America, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

54. Defendant Con-Way Freight, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Con-Way Freight, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

55. Defendant Con-Way, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Con-Way, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

56. Defendant Dawes Transport, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Dawes Transport, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

57. Defendant deBoer Transportation, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in deBoer Transportation, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

58. Defendant Do It Best Corp. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Do It Best Corp. Freight's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

59. Defendant Dohrn Transfer Company uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Dohrn Transfer Company's fleet of trucks, vans

or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

60. Defendant Earl L. Henderson Trucking Company uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Earl L. Henderson Trucking Company's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

61. Defendant Equity Transportation Company, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Equity Transportation Company, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

62. Defendant G & F Trucking Leasing, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in G & F Trucking Leasing, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

63. Defendant Gully Transportation, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is

alleged below. Trucks, vans or other vehicles in Gully Transportation, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

64. Defendant H.O. Wolding, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in H.O. Wolding, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

65. Defendant JBS Logistics, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in JBS Logistics, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

66. Defendant Johnson Trucking of Neenah, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Johnson Trucking of Neenah, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

67. Defendant Marten Transports, LLC uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and

tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Marten Transports, LLC's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

68. Defendant The Mason and Dixon Lines, Incorporated uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in The Mason and Dixon Lines, Incorporated's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

69. Defendant North American Van Lines, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in North American Van Lines, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

70. Defendant Ormsby Trucking, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Ormsby Trucking, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

71. Defendant Point Dedicated Services, LLC uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Point Dedicated Services, LLC's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

72. Defendant R&M Trucking Co. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in R&M Trucking Co.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

73. Defendant Roadrunner Transportation Services, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Roadrunner Transportation Services, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

74. Defendant Roehl Transport, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Roehl Transport, Inc.'s fleet of trucks, vans or

other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

75. Defendant Rush Trucking Corporation uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Rush Trucking Corporation's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

76. Defendant Schneider National Carriers, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Schneider National Carriers, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

77. Defendant Standard Forwarding, LLC uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Standard Forwarding, LLC's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

78. Defendant Super Service, LLC uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is

alleged below. Trucks, vans or other vehicles in Super Service, LLC's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

79. Defendant Thomason Express, LLC uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Thomason Express, LLC's fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

80. Defendant Transportation Services, Inc. (TSI) uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Transportation Services, Inc.'s (TSI) fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

81. Defendant Universal Truckload Services, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Universal Truckload Services, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

82. Defendant USF Holland, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and

tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in USF Holland, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

83. Defendant Venture Logistics Services, Inc. uses, and/or directs its agents, employees, customers, or contracting entities to use, electronic position-based fleet management and tracking systems in its fleet of trucks, vans or other vehicles that infringe the patent in suit, as is alleged below. Trucks, vans or other vehicles in Venture Logistics Services, Inc.'s fleet of trucks, vans or other vehicles operate in the State of Illinois, including in this judicial district, while using the infringing electronic fleet management systems.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 5,223,844

84. PJC Logistics repeats and realleges the allegations of paragraphs 1 through 83 as if fully set forth herein.

85. On June 29, 1993, United States Patent No. 5,223,844 (hereinafter referred to as the "844 Patent"), entitled VEHICLE TRACKING AND SECURITY SYSTEM, was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '844 Patent is attached as Exhibit A to this Complaint.

86. PJC Logistics is the assignee and owner of the right, title, and interest in and to the '844 Patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

87. Without license or authorization, each of the Defendants have been infringing the '844 Patent, and contributing to and actively inducing the infringement of said patent by others in the United States, by using in the United States, including within this judicial district, certain

electronic fleet management systems that embody the inventions claimed in the '844 Patent.

Such acts constitute infringement under at least 35 U.S.C. §§ 271(a), (b), and (c).

88. PJC Logistics has been damaged by Defendants' infringing activities.

JURY DEMAND

89. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, PJC Logistics demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

WHEREFORE, PJC Logistics respectfully demands judgment for itself and against Defendants as follows:

- a. That this Court adjudge that Defendants have each infringed the '844 Patent;
- b. That this Court ascertain and award PJC Logistics damages sufficient to compensate it for the above infringement and that the damages so ascertained be awarded to PJC Logistics with interest;
- c. That this Court find this case to be exceptional and award PJC Logistics its attorneys fees, costs and expenses in this action;
- d. An accounting of all infringing sales including, but not limited to, those sales not presented at trial and an award by the Court for any such sales; and
- e. That this Court award PJC Logistics such other relief as the Court may deem just and proper.

Respectfully submitted,

Dated: March 22, 2011

/s/ Jeana R. Lervick
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