

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

ARRIVALSTAR S.A. and MELVINO
TECHNOLOGIES LIMITED,

Plaintiffs,

vs.

GLOBAL SECURITY TRACKING, INC. and
LAIPAC TECH USA, LLC

Defendant.

Case No.: 1:11-cv-0517

DEMAND FOR JURY TRIAL

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 Global Security Tracking, Inc. (“Global Security Tracking”) and Laipac Tech USA, LLC (“Laipac”)(Global Security Tracking and Laipac are 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. 6,714,859 (“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 A.

5. 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 B.

6. 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 C. The ‘359 patent was the subject of an *Inter Partes* reexamination at the United States Patent and Trademark Office. A Reexamination Certificate was issued on May 25, 2010 and is annexed hereto as Exhibit D.

7. 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 E.

8. 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 F.

9. Defendant Global Security Tracking is a Massachusetts Corporation with a place of business at 210 Park Ave, Suite 177, Worcester, Massachusetts 01602. Global Security Tracking 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, ‘606, ‘359 and ‘058 patents.

10. Defendant Laipac is a Delaware Corporation with a place of business at 2665 S. Bayshore Drive, Suite 220, Coconut Grove, Florida 33133. Laipac 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, ‘606, ‘359, ‘645 and ‘058 patents.

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

DEFENDANT GLOBAL SECURITY TRACKING’S

ACTS OF PATENT INFRINGEMENT

12. Defendant Global Security Tracking has infringed claims of the ‘859, ‘606, ‘359 and ‘058 patents through, among other activities, the use of Global Security Tracking’s Gotek vehicle tracking system.

13. Defendant Global Security Tracking’s infringement 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, '606, '359 and '058 patents.

DEFENDANT LAIPAC'S ACTS OF PATENT INFRINGEMENT

14. Defendant Laipac has infringed claims of the '859, '606, '359, '645, and '058 patents through, among other activities, the use of Laipac's LocationNow vehicle tracking system.

15. Defendant Laipac's infringement 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, '606, '359, '645, and '058 patents.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs ask this Court to enter judgment against the Defendant, 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: July 25, 2011

Respectfully submitted,

/s/ Anthony E. Dowell

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