

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ONASSET INTELLIGENCE, INC.,

PLAINTIFF,

v.

**MOOG INC., AND
CROSSBOW TECHNOLOGY, INC.,**

DEFENDANTS.

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CIVIL ACTION NO. 3:11-cv-03154

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff OnAsset Intelligence, Inc. (“OnAsset”) hereby files its complaint for patent infringement Defendants Moog Inc. (“Moog”) and Crossbow Technology, Inc. (“Crossbow”).

PARTIES

1. Plaintiff OnAsset is a Texas corporation with its headquarters and principal place of business at 3080 Story Road West, Irving, Texas 75038-3529.

2. Defendant Moog is a New York corporation with its corporate headquarters and principal place of business at Seneca Street and Jamison Road, East Aurora, New York 14052. Moog may be served through its chief executive officers John R. Scannell at Moog Inc., Seneca Street and Jamison Road, East Aurora, New York 14052.

3. Defendant Crossbow is a California corporation with its corporate headquarters and principal place of business at 1421 McCarthy Boulevard, Milpitas, California 95035. Crossbow may be served through its registered agent CT Corporation System at 818 W. Seventh Street, Los Angeles, California 90017.

JURISDICTION AND VENUE

4. This action arises under the Patent Act of 1952, 35 U.S.C. § 101 *et seq.* and Lanham Act. This Court has original and exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. §§ 1331 and 1338(a) and (b).

5. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c) and 1400(b), because Defendants have transacted business in this district and, on information and belief, have committed acts of patent infringement in this district.

U.S. PATENT NO. 7,791,455

6. OnAsset is the owner by assignment of United States Patent No. 7,791,455 (“the ‘455 Patent”), entitled “Method and Apparatus for Autonomous Detection of a Given Location or Situation.” A true and correct copy of the ‘455 Patent is attached as Exhibit A. The ‘455 Patent was duly and legally issued on September 7, 2010.

FIRST CLAIM FOR RELIEF

Infringement of the ‘455 Patent

7. Defendants have been and now are directly and indirectly infringing the ‘455 Patent in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, manufacturing, selling, and offering to sell air cargo tracking systems and devices covered by one or more claims of the ‘455 Patent to the injury of OnAsset.

8. Defendants manufacture an air cargo tracking system and device referred to as the “ILC2000,” which infringes one or more claims of the ‘455 Patent.

9. On information and belief, Defendants were aware of the ‘455 Patent prior to any infringing acts.

10. As a result of Defendants' infringement of the '455 Patent, OnAsset has suffered monetary damages in an amount not yet determined and will continue to suffer damages in the future unless Defendants' infringing activities are enjoined by this Court.

11. Defendants' infringement of the '455 Patent is causing OnAsset irreparable harm that cannot be adequately compensated by a damage award. Unless Defendants are enjoined from infringing the '455 Patent, OnAsset will be greatly and irreparably harmed.

JURY DEMAND

12. OnAsset demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

OnAsset requests that the Court enter:

A. A preliminary and permanent injunction against Defendants enjoining them, their officers, directors, agents, servants, employees, investors, affiliates, divisions, branches, subsidiaries, parents and all others acting in active concert or in participation with them from infringement, inducement to infringe, or contributory infringement of the '455 Patent, including the manufacture, sale, offer for sale, distribution, or promotion of products falling within the scope of the '455 Patent;

B. A judgment in favor of OnAsset that Defendants have infringed, directly or indirectly, the '455 Patent;

C. A judgment ordering Defendants to pay OnAsset damages adequate to fully compensate OnAsset for Defendants' infringement of the '455 Patent, together with pre- and post-judgment interest and costs as fixed by the Court under 35 U.S.C. § 284;

D. A judgment in favor of OnAsset that Defendants have willfully infringed the '455 Patent;

E. A judgment ordering Defendants to pay OnAsset enhanced damages up to three times the amount of actual damages found or assessed as appropriate under 35 U.S.C. § 284;

F. A judgment and order that this is an “exceptional” case under 35 U.S.C. § 285 and awarding OnAsset its reasonable attorneys’ fees;

G. A judgment ordering Defendants to pay OnAsset’s costs;

H. A judgment awarding OnAsset both re- and post-judgment interest on all sums for which judgment is granted; and

I. Any and all other and further relief as this Court deems just and proper.

Dated: November 15, 2011

BUETHER JOE & CARPENTER, LLC

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