IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

MEL NAVIP LLC, Plaintiff -against- TOYOTA MOTOR NORTH AMERICA, INC.; TOYOTA MOTOR ENGINEERING & MANUFACTURING NORTH AMERICA, INC.; and TOYOTA MOTOR SALES, U.S.A., INC., Defendants.	Civil Action No.: 2:22-cv-00152 **Jury Trial Demanded**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Mel NavIP LLC ("Mel NavIP" or "Plaintiff"), by way of this Complaint against Defendants Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc., and Toyota Motor Sales, U.S.A., Inc., (collectively "Toyota" or "Defendants"), alleges as follows:

PARTIES

1. Plaintiff Mel NavIP LLC is a limited liability company organized and existing under the laws of the State of Texas, having its principal place of business at 1708 Harrington Drive, Plano, Texas 75075.

2. On information and belief, Defendant Toyota Motor North America, Inc. is a corporation organized and existing under the laws of the State of California, having its principal place of business at 656 Headquarters Drive W1-3C, Plano, Texas 75024. Toyota Motor North America, Inc. may be served through its registered agent C T Corporation System 1999 Bryan Street, Suite 900, Dallas, Texas 75201. On information and belief, Toyota Motor North America, Inc is

registered to do business in the State of Texas and has been since at least June 5, 2014.

3. On information and belief, Defendant Toyota Motor Engineering & Manufacturing North America, Inc. is a corporation organized and existing under the laws of the State of Kentucky, having its principal place of business at 656 Headquarters Drive W1-3C, Plano, Texas 75024. Toyota Motor Engineering & Manufacturing North America, Inc. may be served through its registered agent C T Corporation System 1999 Bryan Street, Suite 900, Dallas, Texas 75201. On information and belief, Toyota Motor Engineering & Manufacturing North America, Inc. is registered to do business in the State of Texas and has been since at least April 11, 2005.

4. On information and belief, Defendant Toyota Motor Sales, U.S.A., Inc. is a corporation organized and existing under the laws of the State of California, having its principal place of business at 656 Headquarters Drive W1-3C, Plano, Texas 75024. Toyota Motor Sales, U.S.A., Inc. may be served through its registered agent C T Corporation System 1999 Bryan Street, Suite 900, Dallas, Texas 75201. On information and belief, Toyota Motor Sales, U.S.A., Inc. is registered to do business in the State of Texas and has been since at least April 5, 1974.

JURISDICTION AND VENUE

5. This is an action under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.*, for infringement by Toyota of claims of U.S. Patent No. 8,060,368; U.S. Patent No. 8,244,465; U.S. Patent No. 8,311,735; and U.S. Patent No. 9,239,829 (collectively "the Patents-in-Suit").

6. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. Toyota is subject to personal jurisdiction of this Court because, *inter alia*, on information and belief, (i) Toyota maintains a regular and established place of business in Texas in this Judicial District at 656 Headquarters Drive W1-3C, Plano, Texas 75024; (ii) Toyota employs employees and sells products and services to customers in this Judicial District; and (iii) the

patent infringement claims arise directly from Toyota's continuous and systematic activity in this Judicial District.

8. Venue is proper as to Toyota in this Judicial District under 28 U.S.C. § 1400(b) because, *inter alia*, on information and belief, Toyota has a regular and established place of business in this Judicial District at 656 Headquarters Drive W1-3C, Plano, Texas 75024, and has committed acts of patent infringement in this Judicial District and/or has contributed to or induced acts of patent infringement by others in this District.

BACKGROUND

9. On November 15, 2011, the United States Patent and Trademark Office duly and lawfully issued U.S. Patent No. 8,060,368 ("the '368 Patent"), entitled "Speech Recognition Apparatus."

10. At the time of the invention of the '368 Patent, conventional speech recognition apparatuses were unable to carry out speech recognition efficiently for separate externally connected devices by only creating or updating the speech recognition dictionary for a single application, such as a single externally connected device. '368 Patent at col. 1:66-2:4. At the time of the invention, conventional speech recognition apparatuses also hindered efficient speech recognition by recording the words passing through its analysis into a single speech recognition dictionary, thereby increasing the time taken for searching the speech recognition dictionary. *See id.* at col. 2:5-13. The '368 Patent improved upon conventional speech recognition apparatus by, among other features, disclosing systems and methods that can carry out the speech recognition with switching the speech recognition dictionary without any special operation of the user offering the advantages of being able to shorten the speech recognition processing time and improving the recognition rate. *See id.* at col. 2:45-50.

11. On August 14, 2012, the United States Patent and Trademark Office duly and lawfully

issued U.S. Patent No. 8,244,465 ("the '465 Patent"), entitled "Navigation System and Display Method of Road Network on the Same System."

12. At the time of the invention of the '465 Patent, conventional navigation systems experienced problems in adjusting the scale of the displayed map, which would result in disappearance of various elements from the navigation screen, thereby confusing a user. *See* '465 Patent at col. 1:12-21. At the time of the invention of the '465 Patent, conventional navigation systems displayed distorted images in attempt to prevent losing continuity of displayed elements. *See id.* at col. 1:22-36. The '465 Patent improved upon conventional navigation systems by, among other features, disclosing a system and method that can achieve the display of the elements such as roads and facilities without distortion or losing continuity, and can reduce the load of the hardware resources in calculating the display positions at that time. *See id.* at col. 2:23-29.

13. On November 13, 2012, the United States Patent and Trademark Office duly and lawfully issued U.S. Patent No. 8,311,735 ("the '735 Patent"), entitled "Navigation System."

14. At the time of the invention of the '735 Patent, conventional navigation systems were unable to update map data without detaching the map data storing means from the navigation system, and then attaching the storing means again to the navigation system, or by stopping the navigation function to copy updated map data to the map data storing means. *See* '735 Patent at col. 1:25-32. The '735 Patent improved upon conventional navigation systems, among other features, by disclosing a system and method for updating navigation maps enabling the update of the map data while using a navigation function. *See id.* at col. 1:33-38.

15. On January 19, 2016, the United States Patent and Trademark Office duly and lawfully issued U.S. Patent No. 9,239,829 ("the '829 Patent"), entitled "Speech Recognition Device."

16. At the time of the invention of the '829 Patent, conventional speech recognition systems were not able to perform real-time speech recognition for a plurality of languages. *See* '829 Patent at col. 1:44-64. The '829 Patent improved upon conventional speech recognition systems by, among other features, disclosing a system and method for recognizing speech from multiple languages without requiring large storage capacity, and by performing such speech recognition in real-time. *See id.* at col. 1:65-2:29.

17. Mel NavIP is the assignee and owner of the right, title, and interest in and to the Patents-in-Suit, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

18. Toyota has infringed and continues to infringe the Patents-in-Suit by making, using, selling, or offering for sale in the United States, or importing into the United States vehicles with infotainment system technology claimed in the Patents-in-Suit. Attachment A to this Complaint provides a non-exhaustive listing of Accused Products.

COUNT I: INFRINGEMENT OF THE '368 PATENT BY TOYOTA

19. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

20. On information and belief, Toyota has infringed the '368 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, offering to sell, selling in the United States or importing into the United States the Accused Products and all other products with substantially similar infotainment systems.

21. For example, on information and belief, Toyota has infringed and continues to infringe at least claim 1 of the '368 Patent by making, using, offering to sell, selling in the United States, or importing into the United States the Accused Products, such as the 2022 Toyota Rav4 with a Navigation and Multimedia System which includes a speech recognition apparatus. Ex. 1 at 159 ("Due to natural language speech recognition technology, this [2022 Toyota Rav4] system

recognizes commands when spoken naturally."). The Accused Products include an external information acquiring section configured to acquire, from an externally connected device connected to the speech recognition apparatus, a device type of the externally connected device. Ex. 1 at 17, 39-41, 44, 149, 191 (The 2022 Toyota Rav4's Navigation and Multimedia System acquires data from various external audio and media inputs, such as device type and associated compatibility to interface with the vehicle's system). The external information acquiring section in the Accused Products is configured to acquire data recorded in said externally connected device. Ex. 1 at 153, 163-164, 176, 184 (The 2022 Toyota Rav4's Navigation and Multimedia System acquires data from the externally connected device such as contact list data and/or media data such as song titles or artist names). The Accused Products include a vocabulary extracting analyzing section configured to extract a vocabulary item as an extracted vocabulary item form the data acquired by the external information acquiring section. Ex. 1 at 153, 163-164, 176 (The 2022 Toyota Rav4's Navigation and Multimedia System extracts vocabulary items from the acquired data such as contact names, song titles and/or artist names); Ex. 2 (video showing invocation of voice recognition to make phone calls, including for a command to "call home."). The vocabulary extracting analyzing section in the Accused Products is configured to produce analysis data by providing the extracted vocabulary item with pronunciation obtained through analysis of said extracted vocabulary item. Ex. 1 at 162-164 (The 2022 Toyota Rav4's Navigation and Multimedia System analyzes the text of the acquired data to enable the system to recognize invocation of vocabular items during voice recognition, such as "Call <contact>" or "Play Artist <name>"). The Accused Products include a dictionary generating section configured to generate speech recognition dictionaries according to device types of externally connected devices by storing the analysis data produced by the vocabulary extracting analyzing

section into a speech recognition dictionary corresponding to the device type acquired by the external information acquiring section. Ex. 1 at 39-40, 44, 149, 191 (The 2022 Toyota Rav4's Navigation and Multimedia System generates speech recognition dictionaries to enable the system to recognize invocation of vocabular items during voice recognition, such as "Call <contact>" or "Play Artist <name>," which corresponds to a device type, such as a PBAP/MAP compatible Bluetooth phone). The Accused Products include a speech recognition section configured to carry out speech recognition of input speech by referring to a speech recognition dictionary out of the speech recognition dictionaries generated by the dictionary generating section. Ex. 1 at 156, 159, 162, 176 (The 2022 Toyota Rav4's Navigation and Multimedia System recognizes the speech input by referring to a speech recognition dictionary, such a Contact Names Dictionary or Artist Names Dictionary); Ex. 2 (video showing invocation of voice recognition to make phone calls, including for a command to "call home."). The speech recognition section in the Accused Products is configured to output a result of said speech recognition, where the speech recognition dictionary to be used for said speech recognition corresponds to the device type acquired by the external information acquiring section. Ex. 1 at 39-40, 162, 191 (The 2022 Toyota Rav4's Navigation and Multimedia System outputs a result of said speech recognition, such as outputting audio for a call or media playback, wherein the speech recognition dictionary used corresponds to the device type, such as a PBAP/MAP compatible Bluetooth phone); Ex. 2 (video showing the result of invocation of voice recognition to make phone calls, including for a command to "call home.").

22. Toyota has been aware of the '368 Patent, and of its infringement of the '368 Patent, at least as of the date of this complaint. On information and belief, Toyota has induced infringement of the '368 Patent pursuant to 35 U.S.C. § 271(b), by actively and knowingly

inducing, directing, causing, and encouraging others, including, but not limited to, its partners, resellers, distributers, customers, and end users, to make, use, sell, and/or offer to sell in the United States, and/or import into the United States, the Accused Products by, among other things, providing the accused products and incorporated navigation and multimedia technology, software, specifications, instructions, manuals, advertisements, marketing materials, and technical assistance relating to the installation, set up, use, operation, and maintenance of said products.

COUNT II: INFRINGEMENT OF THE '465 PATENT BY TOYOTA

23. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

24. On information and belief, Toyota has infringed the '465 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, offering to sell, selling in the United States or importing into the United States the Accused Products and all other products with substantially similar infotainment systems.

25. For example, on information and belief, Toyota has infringed and continues to infringe at least claim 1 of the '465 Patent by making, using, offering to sell, selling in the United States, or importing into the United States the Accused Products, such as the 2022 Toyota Avalon with a Dynamic Navigation system. Ex. 3 ("The Avalon will offer dynamic navigation standard on Touring and Limited models…."). The Accused Products include a map data storage section for storing map data together with attributes and classes of the map data, the map data being composed of roads necessary for a route search and display elements including city centers and facilities, and the city centers being a display element each representing a city and indicating a representative position of the city, wherein the attributes are indicative of whether or not each of the roads should be displayed for each of a plurality of map scales. Ex. 4 at 78, 82, 95 (Toyota's Dynamic Navigation system stores map data composed of classes of roads for a route search, and

classes of display elements, such as city centers (text such as "Boston" indicative of the city's position) and facilities (represented by graphical icons or building outlines)); Ex. 5 (Toyota's Dynamic Navigation system displaying roads having attributes, e.g., a size attribute such as small (represented as white roads), medium (represented as blue roads), or large roads (represented as orange roads), that indicate whether or not each of the roads should be displayed depending on the map scale). The Accused Products include a display section for displaying the map data. Ex. 5 (Toyota's Dynamic Navigation system has a display screen for displaying the map data). The Accused Products include an input section for inputting an instruction from a user. Ex. 4 at 86, 95 and Ex. 6 (Toyota's Dynamic Navigation system allows a user to input instruction, e.g., inputting a destination address to route the user to and the desired scale of the map). The Accused Products include a control section for carrying out a procedure of calculating a route between an own-vehicle position and a destination represented by one of the display elements, the destination being instructed via the input section. Ex. 4 at 95, 97, 99 and Ex. 6 (Toyota's Dynamic Navigation system calculates a route between an own-vehicle position, e.g., using a GPS location of the vehicle, and a destination represented by a display element, e.g., a red pin, wherein the destination was input by the user). In the Accused Products, the control section also carries out, in accordance with one of the plurality of map scales instructed via the input section, a procedure of displaying a map on the display section. Ex. 4 at 95 and Ex. 6 (Toyota's Dynamic Navigation system displays a map on the Toyota vehicle's infotainment system, wherein the map scale depends on the distance of the route and/or the desired scale input by the user pressing the "+" or "-" buttons.). In the Accused Products, the procedure of displaying a map on the display section includes selecting the roads indicated by the attributes as being displayable according to the instructed map scale, and by selecting the display elements

based on ranks. Ex. 6 (Toyota's Dynamic Navigation system selects the roads according to its attributes, such as a size attribute, e.g., small, medium, or large roads, to be displayed depending on the instructed map scale; and Toyota's Dynamic Navigation system selects the display elements, such as street labels, based on ranks, e.g., highly ranked street labels close to or on the route are displayed prominently and lower ranked street labels are not displayed). In the Accused Products, the procedure of displaying a map on the display section includes further selecting each of the roads that is part of the calculated route but not indicated by the attributes as being displayable according to the instructed map scale. Ex. 6 (Toyota's Dynamic Navigation system selects and displays the roads that are part of the calculated route even if based on their attribute they would normally be deemed too small to display according to the instructed map scale). In the Accused Products, the procedure of displaying a map on the display section includes displaying the selected roads and the selected display elements on the display selection as part of the map. Ex. 6 (Toyota's Dynamic Navigation displays the selected roads and the selected display elements on the vehicle infotainment system's map).

26. Toyota has been aware of the '465 Patent, and of its infringement of the '465 Patent, at least as of the date of this complaint. On information and belief, Toyota has induced infringement of the '465 Patent pursuant to 35 U.S.C. § 271(b), by actively and knowingly inducing, directing, causing, and encouraging others, including, but not limited to, its partners, resellers, distributers, customers, and end users, to make, use, sell, and/or offer to sell in the United States, and/or import into the United States, the Accused Products by, among other things, providing the accused products and incorporated navigation and multimedia, software, specifications, instructions, manuals, advertisements, marketing materials, and technical assistance relating to the installation, set up, use, operation, and maintenance of said products.

COUNT III: INFRINGEMENT OF THE '735 PATENT BY TOYOTA

27. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

28. On information and belief, Toyota has infringed the '735 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, offering to sell, selling in the United States or importing into the United States the Accused Products and all other products with substantially similar infotainment systems.

29. For example, on information and belief, Toyota has infringed and continues to infringe at least claim 3 of the '735 Patent by making, using, offering to sell, selling in the United States, or importing into the United States the Accused Products, such as the 2022 Toyota Camry with a Dynamic Navigation system. Ex. 7 at 5 (the 2022 Toyota Camry has a Dynamic Navigation system). The Accused Products include a navigation system provided with a position detecting unit for detecting a current position of a vehicle, a map data storing unit for storing map data about roads, a display data generating unit for reading map data about a surrounding area from said map data storing unit based on the current position of the vehicle detected by said position detecting unit, and for generating data for display, a display unit for displaying the data for display generated by said display data generating unit, and a control unit for controlling functions of the navigation system. Ex. 7 at 5, 76, 78, 80, 124 (Toyota's Dynamic Navigation system includes a position detecting unit for detecting a current position of a vehicle, such as by using a Global Positioning System (GPS) unit; Toyota's Dynamic Navigation system includes a map data storing unit (map database) for storing "Map Data;" Toyota's Dynamic Navigation system includes a display data generating unit for reading map data about a surrounding area from said map data storing unit based on the current position of the vehicle detected by said position detecting unit and for generating data for display; and Toyota's Dynamic Navigation system includes a control unit for controlling functions of the navigation system). In the

Accused Products, an update map data acquiring unit for acquiring update map data is disposed, and, while said control unit is using a navigation function using yet-to-be-updated map data stored in said map data storing unit, said navigation system updates the map data by writing the update map data from said update map data acquiring unit in a free space on said map data storing unit. Ex. 5 and Ex. 7 at 125 (Toyota's Dynamic Navigation system includes an update map data acquiring unit for acquiring updated map data and a control unit using a navigation function with yet-to-be updated map data; and the Dynamic Navigation system updates the map data by storing an optimized route downloaded from the cloud into free space in the map data storing unit and the optimized route downloaded from the cloud includes pertinent updated map data close to a vehicle's location and/or along the set route, including newly added roads and updated traffic conditions). In the Accused Products, the control includes: a navigation function execution unit connected to the position detecting unit, the map data storing unit, and the display data generating unit, for executing the navigation function; a map data download executing unit connected to said map data storing unit and said update map data acquiring unit, for performing download of map data; and a priority controlling unit connected to said navigation function execution unit and said map data download executing unit, for determining a priority of the navigation function execution and a priority of the download execution. Ex. 5 and Ex. 7 at 94, 125 (the control unit of Toyota's Dynamic Navigation system includes a navigation function execution unit connected to the GPS unit, the map data storing unit, and the display data generating unit, for executing the navigation function, e.g., routing a driver to destination; and the control unit of Toyota's Dynamic Navigation system further includes a priority controlling unit, e.g., a "dynamic route setting," connected to said navigation function execution unit and said map data download executing unit, for determining a priority of the navigation function

execution and a priority of the download execution, i.e., for determining whether to prioritize receiving dynamically optimized routes from the cloud or to prioritize navigation function execution relying on older map data).

30. Toyota has been aware of the '735 Patent, and of its infringement of the '735 Patent, at least as of the date of this complaint. On information and belief, Toyota has induced infringement of the '735 Patent pursuant to 35 U.S.C. § 271(b), by actively and knowingly inducing, directing, causing, and encouraging others, including, but not limited to, its partners, resellers, distributers, customers, and end users, to make, use, sell, and/or offer to sell in the United States, and/or import into the United States, the Accused Products by, among other things, providing the accused products and incorporated navigation and multimedia technology, software, specifications, instructions, manuals, advertisements, marketing materials, and technical assistance relating to the installation, set up, use, operation, and maintenance of said products.

COUNT IV: INFRINGEMENT OF THE '829 PATENT BY TOYOTA

31. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

32. On information and belief, Toyota has infringed the '829 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, offering to sell, selling in the United States or importing into the United States the Accused Products and all other products with substantially similar infotainment systems.

33. For example, on information and belief, Toyota has infringed and continues to infringe at least claim 1 of the '829 Patent by making, using, offering to sell, selling in the United States, or importing into the United States the Accused Products, such as the 2022 Toyota Tundra with an Intelligent Assistant System which includes a speech recognition device. Ex. 8 at 35-36 (the 2022 Toyota Tundra has an Intelligent Assistant System with Voice Recognition); Ex. 9

(Toyota's Intelligent Assistant System uses Cerence for speech recognition). The Accused Products include a microphone that converts an input speech into an electric signal. Ex. 8 at 35 and Ex. 10 at 7 (Toyota's microphone converts input speech to electrical signals). The Accused Products include a speech recognizer to perform speech recognition for said electric signal with a speech recognition engine corresponding to a predetermined language that is a language that is set in advance as a recognition subject by referring to recognition subject word information including writing information and reading information of each recognition subject word included in a recognition subject vocabulary registered in a speech recognition dictionary. Ex. 9 at 47, 58, Ex. 10 at 7, 9, 10, 30, and Ex. 11 at 12, 15, 16 (Toyota's Intelligent Assistant System includes a speech recognizer, such as an automatic speech recognition (ASR) unit and/or natural language understanding (NLU) module that performs recognition for said electric signal with a speech recognition engine (i.e. language dependent text analysis module) corresponding to a predetermined language (i.e. English Language Setting and/or Native Language) that is a language that is set in advance as a recognition subject (i.e. English language); Toyota's speech recognizer performs speech recognition by referring to recognition subject word information, such as information that is associated with tags including writing information (i.e. letters and symbols) and reading information (i.e. phonemes); and the English language dependent text analysis module is registered in the English speech recognition dictionary); *see also* Ex. 12 at 11 and Ex. 13 (Cerence has rights in approximately 1,250 patents once owned by Nuance; upon information and belief, Cerence uses Nuance's technology, including technology embodied in U.S. Patent No. 8,990,089 to implement the Cerence platform); *see also* Ex. 14 (Cerence's default language in the US is English). The Accused Products include a first memory to store a reading information generation data base in which a reading information generation rule that

indicates a correspondence between writing information of a word in one language among a plurality of languages and reading information thereof in another language is registered. Ex. 9 at 47, 58, Ex. 10 at 7, 9, 30, Ex. 11 at 12, 15, Ex. 13, and Ex. 14 (Toyota's Intelligent Assistant System includes a first memory, such as a memory in the cloud and/or edge platform, to store a reading information generation data base; in one example, the reading information generation data base is the data base where information on the conversion of a word written in one language out of a plurality of languages can be transformed into a spoken word in another language; and Toyota's Intelligent Assistant System reading information generation rule indicates a correspondence between writing information of a word in one language among a plurality of languages and reading information in another language, such as reading all English when the writing information is derived from Spanish and English, such as by transforming written orthographic form (Spanish and English character sets and encodings) into spoken phonemic symbols of the intended reading language). The Accused Products include a reading information generator to generate the reading information of the word in the another language from the writing information in the one language based on the reading information generation rule of the reading information generation data base. Ex. 11 at 15 (Toyota's Intelligent Assistant System reading information generator generates the reading information, such as the spoken phonemic symbols of the intended language from the written phonemic symbols based on the reading information generation rule of the reading information generation database). The Accused Products include a controller to perform control such that, when a word in a different language that is different from the predetermined language is included in the recognition subject vocabulary, the reading information generator generates the reading information in the predetermined language from the writing information in the different language, and that the

speech recognizer performs speech recognition that makes reference to the recognition subject word information of the corresponding word, including the generated reading information in the predetermined language. Ex. 10 at 7, 9, 30 and Ex. 13 (Toyota's Intelligent Assistant System controller (i.e. Automatic Language Tagger and Reader) performs control such that, when a word in a different language (i.e. Spanish) that is different from the predetermined language is included in the recognition subject vocabulary, the reading information generator generates the reading information (English Phonemes) of the predetermined language FROM the writing information (Spanish character sets and encodings) of the corresponding word information of the corresponding word, including the generated reading information in English; and when a word in a different language is included in the recognition subject vocabulary, the reading information generator generates the reading information in the predetermined language from the writing information in the different language, such as when Spanish writing information (i.e. Spanish orthography, character sets and encodings) are referenced by the reading information (English Phonemes)).

34. Toyota has been aware of the '829 Patent, and of its infringement of the '829 Patent, at least as of the date of this complaint. On information and belief, Toyota has induced infringement of the '829 Patent pursuant to 35 U.S.C. § 271(b), by actively and knowingly inducing, directing, causing, and encouraging others, including, but not limited to, its partners, resellers, distributers, customers, and end users, to make, use, sell, and/or offer to sell in the United States, and/or import into the United States, the Accused Products by, among other things, providing the accused products and incorporated navigation and multimedia technology, software, specifications, instructions, manuals, advertisements, marketing materials, and technical assistance relating to the installation, set up, use, operation, and maintenance of said

products.

PRAYER FOR RELIEF

WHEREFORE, Mel NavIP prays for judgment in its favor against Toyota for the following relief:

A. Entry of judgment in favor of Mel NavIP against Toyota on all counts;

B. Entry of judgment that Toyota has infringed the Patents-in-Suit;

C. An order permanently enjoining Toyota from infringing the Patents-in-Suit;

D. Award of reasonable attorneys' fees and expenses against Toyota pursuant to 35 U.S.C. § 285;

E. Mel NavIP's costs;

F. Pre-judgment and post-judgment interest on Mel NavIP's award; and

G. All such other and further relief as the Court deems just or equitable.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Fed. R. Civ. Proc., Plaintiff hereby demands trial by jury in this action of all claims so triable.

Dated: May 16, 2022

Respectfully submitted,

/s/ *Dmitry Kheyfits*

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