

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Redmon Jeang LLC,

Plaintiff,

v.

TurnSignl, Inc. and
TurnSignl Foundation,

Defendants.

Court File No. _____

**COMPLAINT FOR
PATENT INFRINGEMENT**

Plaintiff Redmon Jeang LLC (“Plaintiff” or “Redmon”), by and through its undersigned counsel, alleges, on knowledge as to its own actions and otherwise upon information and belief, by way of this Complaint for Patent Infringement against Defendants TurnSignl, Inc. and TurnSignl Foundation (collectively, “Defendants” or “TurnSignl”) as follows:

THE PARTIES

1. Redmon is a limited liability company organized under the laws of the State of Texas having a principal place of business at 2709 Dublin Road, Plano, Texas 75094.

2. Upon information and belief, Defendant TurnSignl, Inc. is a corporation organized and existing under the laws of the State of Delaware, and Defendant TurnSignl Foundation is a nonprofit corporation organized and existing under the laws of the State of Minnesota.

3. Upon information and belief, Defendants’ principal place of business is at: 1317 Marshall Street NE, Minneapolis, Minnesota 55413; 34 13th Avenue NE,

Minneapolis, Minnesota 55413; and/or 620 Wentworth Avenue W, Mendota Heights, Minnesota 55118.

4. Defendants may be served via their registered agents: Andre Creighton, 1317 Marshall Street NE, Minneapolis, Minnesota 55413 and/or Michael Nathan, 620 Wentworth Avenue West, Mendota Heights, Minnesota 55118.

JURISDICTION AND VENUE

5. This is an action for patent infringement under 35 U.S.C. § 271. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendants because their principal place of operations is in the State of Minnesota and, according to the turnsignl.com website, Defendants are currently offering their products in the State of Minnesota.

7. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b) because Defendants have committed acts of infringement in this District by selling, offering to sell, and using infringing products within this District.

BACKGROUND

8. On September 13, 2022, U.S. Patent No. 11,443,395 (the “’395 Patent”), entitled “Mobile Legal Counsel System and Method,” was duly and legally issued by the United States Patent and Trademark Office to Redmon, as assignee of named inventors Clayton K. Redmon and Wei Wei Jeang. A true and correct copy of the ’395 Patent is attached as **Exhibit 1**.

9. Redmon is the sole owner of all right, title, and interest in and to the '395 Patent with full right to bring suit to enforce the patent, including the right to recover for past infringement damages.

10. The named inventors of the '395 Patent recognized a need to defuse and de-escalate tense situations between the police and members of the general public so that the loss of innocent lives can be avoided or reduced.

11. The '395 Patent describes and claims a mobile lawyer system for summoning an attorney during a traffic stop, quickly and virtually, whenever a need arises to help defuse the situation, run interference, and provide legal advice.

12. Claim 1 is exemplary of the inventions claimed in the '395 Patent:

1. A mobile lawyer system for use during a traffic stop comprising:

a mobile device having at least one video camera configured for mounting inside the passenger compartment of a vehicle and capture video images of a driver of the vehicle;

the mobile device further incorporating a display screen viewable by the driver of the vehicle;

a remote server and a database configured to store information about a plurality of lawyers licensed in at least one jurisdiction;

the mobile device executing a mobile application configured, upon command from the driver of the vehicle, to communicate with the remote server, wherein the remote server is configured to automatically determine a location of the vehicle, automatically identify a jurisdiction associated with the vehicle location, automatically identify at least one lawyer licensed in the identified jurisdiction, and immediately automatically directly notify the at least one identified lawyer for assistance; and

the display screen of the mobile device configured to live-stream a video image of the at least one identified lawyer for presentation to the driver of the vehicle, and the at least one video camera is configured to automatically live-stream video captured by the at least one video camera for viewing by the at least one identified lawyer and for storage in the remote database, where the at least one mobile device being configured to automatically enable bi-directional audio and video communication between the at least one identified lawyer and the at least one passenger.

13. Redmon is also the assignee and sole owner with exclusive right, title, and interest in U.S. Patent No. 11,494,861 (the “’861 Patent”), entitled “Mobile Legal Counsel System and Method.” A true and correct copy of the ’861 Patent issuance notice is attached as **Exhibit 2**.

14. Redmon is also the assignee and sole owner with exclusive right, title, and interest in U.S. Patent No. 11,494,862 (the “’862 Patent”), entitled “Mobile Legal Counsel System and Method.” A true and correct copy of the ’862 Patent issuance notice is attached as **Exhibit 3**.

15. Redmon is also the assignee and sole owner with exclusive right, title, and interest in U.S. Patent Application No. 16/892,277 (the “’277 Patent Application”), entitled “Mobile Legal Counsel System and Method.” The ’277 Patent Application has been allowed by the United States Patent and Trademark Office and the issue fee has been paid. A true and correct copy of the ’277 Patent Application Notice of Allowance is attached as **Exhibit 4**.

16. Defendants operate a website at turnsignl.com that describes a “TurnSignal App” providing “on-demand guidance from an attorney to get you home safe” that “should be used during a traffic stop.”

17. According to the webpage turnsignl.com/about, the TurnSignal App “is an on-demand, real-time service that provides 24/7 legal guidance from an attorney to drivers while their camera records the interaction. When drivers are stopped by law enforcement officers or involved in a car accident, they can access live video chat with an attorney at the press of a button or voice command. TurnSignal attorneys are vetted and trained to de-escalate interactions between police, drivers, and passengers.”

18. According to the webpage turnsignl.com/faq, the TurnSignal App is available monthly for \$6.99/month or annually for \$60/year but, through a partnership with TurnSignal Foundation, is free for those who cannot afford it.

COUNT 1

PATENT INFRINGEMENT OF U.S. PATENT NO. 11,443,395

19. Plaintiff repeats every allegation of the above paragraphs as though fully set forth herein.

20. Each claim of the '395 Patent is valid and enforceable, and each enjoys a statutory presumption of validity pursuant to 35 U.S.C. § 282.

21. Defendants, without authorization or license, have been and are currently infringing one or more claims of the '395 Patent in violation of 35 U.S.C. § 271.

22. Defendants have directly infringed, literally or under the doctrine of equivalents, and will continue to directly infringe, at least claim 1 of the '395 Patent by

making, using, selling, offering to sell, or importing into the United States products or services that embody or practice the system covered by one or more claims of the '395 Patent, including Defendants' TurnSignl mobile application system (collectively referred to as the "Accused System").

23. The Accused System includes a mobile device having a video camera and a display screen. The video camera is configured to be mounted inside the passenger compartment of a vehicle for capturing video images of a driver of the vehicle. The display screen is viewable by the driver of the vehicle.

24. The Accused System includes a remote server and a database configured to store information about a plurality of lawyers licensed in at least one jurisdiction.

25. The Accused System includes a mobile application executed by the mobile device that is configured, upon command from the driver of the vehicle, to communicate with the remote server, wherein the remote server is configured to automatically determine a location of the vehicle, automatically identify a jurisdiction associated with the vehicle location, automatically identify at least one lawyer licensed in the identified jurisdiction, and immediately automatically directly notify the at least one identified lawyer for assistance.

26. The Accused System includes a mobile device with a display screen configured to live-stream a video image of at least one identified lawyer for presentation to the driver of the vehicle, and the at least one video camera is configured to automatically live-stream video captured by the at least one video camera for viewing by the at least one identified lawyer and for storage in the remote database, where the at least one mobile

device being configured to automatically enable bi-directional audio and video communication between the at least one identified lawyer and the at least one passenger.

27. Defendants have had knowledge and notice of the '395 Patent and Defendants' infringement of the '395 Patent, at minimum, as a result of the filing of this Complaint.

28. Redmon expressly reserves the right to investigate and allege any actions by Defendants that render this an exceptional case and any post-filing conduct that constitutes willful infringement, induced infringement, or contributory infringement by Defendants.

29. Defendants' acts of infringement have caused and will continue to cause substantial and irreparable damage to Redmon.

30. As a result of the infringement of the '395 Patent by Defendants, Redmon has been damaged.

31. Redmon is entitled to injunctive relief under 35 U.S.C. § 283.

32. In addition to injunctive relief, Redmon is entitled to recover damages pursuant to 35 U.S.C. § 284 in an amount adequate to compensate Redmon for the infringement, but in no event less than a reasonable royalty.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for entry of judgment against Defendants as follows:

A. A judgment that Defendants have infringed and continue to infringe the '395 Patent;

B. That Defendants provide to Redmon an accounting of all gains, profits, and advantages derived by Defendants' infringement of the '395 Patent, and that Redmon be awarded damages adequate to compensate it for the wrongful infringement by Defendants in accordance with 35 U.S.C. § 284;

C. That Redmon be awarded any other supplemental damages and interest on all damages and costs of court;

D. That the Court permanently enjoin Defendants and all those in privity with Defendants from making, having made, selling, offering for sale, distributing, or using products that infringe the '395 Patent, including the Accused System, in the United States; and

E. That Redmon be awarded such other and further relief and all remedies available at law.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all questions of fact raised by the Complaint.

Date: October 31, 2022

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