

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

RFC LENDERS OF TEXAS, LLC,

Plaintiff,

v.

GLOBAL-VIEW.NET,

Defendant.

CIVIL ACTION NO.: 5:23-cv-387

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

1. This is an action under the patent laws of the United States, Title 35 of the United States Code, for patent infringement in which RFC Lenders of Texas, LLC (“RFC” or “Plaintiff”), makes the following allegations against Global-View.net (“GV” or “Defendant”).

PARTIES

2. Plaintiff is a Texas limited liability company, having its primary office at 405 State Highway 121, Suite A250, Lewisville, TX 75067 – located in Denton County, Texas.

3. Defendant GV appears to be a Texas company, having a principal place of 17806 Interstate Hwy 10, Suite 300, San Antonio, TX 78257. Defendant does not appear to have a registered agent for service of process in Texas.

JURISDICTION AND VENUE

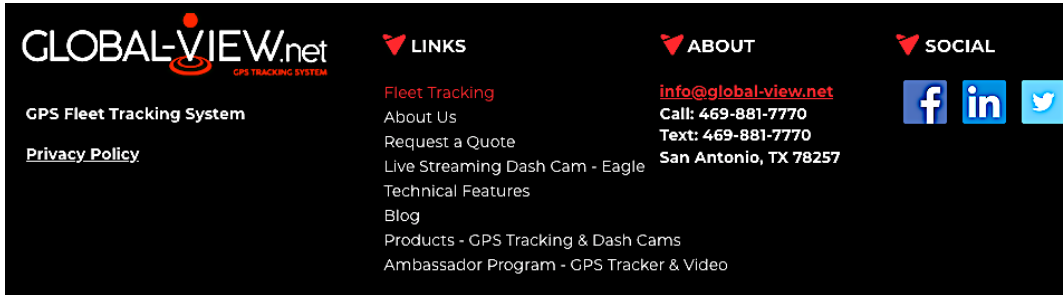
4. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. Venue is proper in this district under 28 U.S.C. §§ 1391(c), generally, and under 1400(b), specifically. Defendant has a regular and established place of business in this Judicial District, and Defendant has also committed acts of patent infringement in this Judicial District.

6. Defendant is subject to this Court’s specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and

(ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this Judicial District.

7. Defendant has its corporate headquarters within Bexar County, Texas:



8. Defendant has infringed, and does infringe, by operating, transacting, and conducting GV’s business within the Western District of Texas.

9. Defendant’s location in Bexar County, Texas is a regular and established place of business in this Judicial District, and Defendant has committed acts of infringement within this District. Venue is therefore proper in this District under 28 U.S.C. § 1400(b).

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 7,430,471

10. Plaintiff is the owner by assignment of the valid and enforceable United States Patent No. 7,430,471 (“the ‘471 Patent”) entitled “Method and System for Monitoring a Vehicle” – including all rights to recover for past, present and future acts of infringement. The ‘471 Patent issued on September 30, 2008, and has a priority date of October 25, 2004. A true and correct copy of the ‘471 Patent is attached as Exhibit A.

11. Defendant directly produces, makes, sells, and offers to sell telematics systems – comprising GV’s fleet tracking systems, GPS tracking devices, vehicle tracking applications, cloud-based software, and related services (“GV System(s)”). The GV Systems are the infringing instrumentalities.

12. The Defendant’s infringing instrumentalities track and monitor vehicles:

GPS Tracking Devices and Fleet Tracking System

▼

What do we offer? The best GPS tracking devices and software to locate cars, trailers, assets, and people. An impressive GPS tracking app and cloud based software to manage your fleet, your vehicles, and your loved ones. Superb customer service experience. All at an affordable

13. The Defendant’s infringing instrumentalities detect and log data related to activation and movement of vehicles being tracked, including driver-specific identification:

Movement start	Movement end	Total trips length, mi	Travel time	Average speed, mph	Max. speed, mph	Stops duration
32132 Jul 12, 2021 00:00 - Jul 12, 2021 23:59 8						
10:43 - San Seavine Way, Jurupa Valley, California, United States, 92337	10:47 - Riverside County Fire Department Station #17, San Seavine Way, Jurupa Valley, California, United States, 92337	0.72	00:03	14	32	00:05
10:52 - Riverside County Fire Department Station #17, San Seavine Way, Jurupa Valley, California, United States, 92337	11:01 - Union Avenue, Fontana, California, United States, 92337	3.19	00:09	20	28	02:50
13:52 - Union Avenue, Fontana, California, United States, 92337	14:01 - Pomona Freeway, Jurupa Valley, California, United States, 92337	2.73	00:08	19	27	00:10
14:11 - Pomona Freeway, Jurupa Valley, California, United States, 92337	15:28 - Elm Avenue, Fontana, California, United States, 92337	33.93	01:17	26	60	01:11
16:39 - Elm Avenue, Fontana, California, United States, 92337	16:47 - Jurupa Avenue, Fontana, California, United States, 92337	1.64	00:08	12	30	01:01
17:49 - Jurupa Avenue, Fontana, California, United States, 92337	18:06 - Union Street, Jurupa Valley, California, United States, 92337	5.66	00:16	21	48	00:54
18:00 - Union Street, Jurupa Valley, California, United States, 92337	19:24 - Ficus Street, Pomona, California, United States, 91766	14.45	00:23	37	61	00:05
19:29 - Ficus Street, Pomona, California, United States, 91766	20:07 - San Seavine Way, Jurupa Valley, California, United States, 92337	13.22	00:37	21	65	03:51
In total:		75.5	08:04	25	65	20:54

Business

Tasks report
Tasks statuses

Task form values
Form fields values

Work statuses report
Status changes history

Check-ins
Check-ins on the map submitted by mobile employees

Driver shift change
Driver ID

Trips by state
Trips breakdown by jurisdictions

Other reports

Drivers

Group by: D/L expiration date

First name ↑ Middle name

Add information about your employees
This will allow to:

- Track their location and activities.
- Dispatch tasks efficiently.
- Benchmark the results of the employees' performance.

14. Defendant’s infringing instrumentalities transmit live data detailing the operation and movement of vehicles to a centralized system, where managers can examine and evaluate the data:

GPS Tracking Device Real Time Data



- Convert real time data into key insights and drive intelligent business decisions.
- Connect assets, maps, data, and people in real-time to make smarter, faster decisions and improve safety.
- Enrich visibility by blending together wide range of tools and databases for directions, geocoding, traffic, gsm / wifi locations and many other geospatial resources.
- Take knowledge of ‘in the moment’ assets activity to accurately target goals and issues and deliver relevant information to all business departments in your organization.



03 / VALUABLE

Global View provides a fleet tracking system that gives fleet managers and business owners valuable insights to make important business decisions. The GPS vehicle tracking system

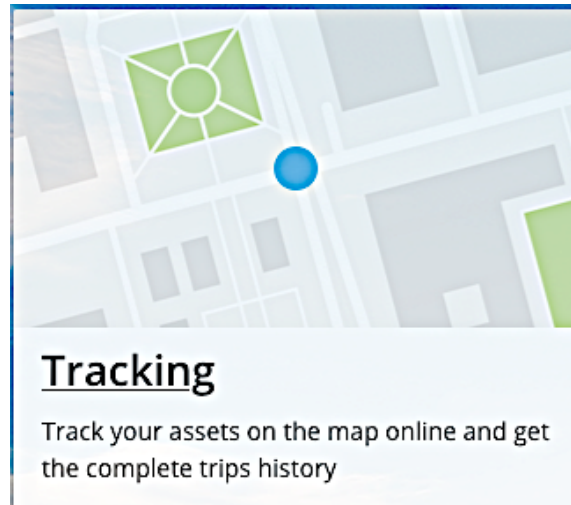
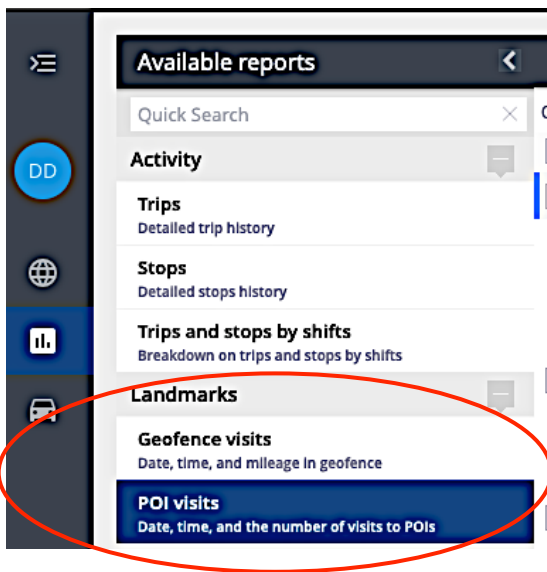
The Eagle Live Streaming Dashcam is an ideal technological tool for daily trips and travel. As a dual-channel dash cam, it contains a front-facing camera recording what’s transpiring on the road and a cabin-facing camera recording what’s happening in the cabin. Our Eagle Live Streaming Dash Cam features live video streaming, GPS tracking, event alerts, and more. These features make it the perfect choice for: video evidence for accidents or collisions, monitoring employees and their driving habits, keeping an eye on your teenager as they learn to drive responsibly, and more.

Telematics units will track device location by sending GPS coordinates to the Global-View.Net Portal application. We may also determine location by using other data from your mobile device, such as information about wireless networks or cell towers near your device. We use and store information about your location to enable many product features that are dependent upon location tracking. We may also use collected information to troubleshoot

15. The Defendant’s infringing instrumentalities determine and analyze driver activity in relation to vehicle activity:

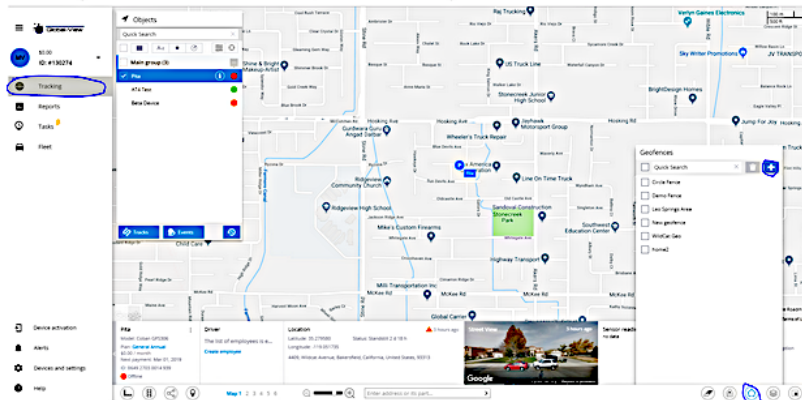
The Eagle Live Streaming Dashcam is an ideal technological tool for daily trips and travel. As a dual-channel dash cam, it contains a front-facing camera recording what's transpiring on the road and a cabin-facing camera recording what's happening in the cabin. Our Eagle Live Streaming Dash Cam features live video streaming, GPS tracking, event alerts, and more. These features make it the perfect choice for: video evidence for accidents or collisions, monitoring employees and their driving habits, keeping an eye on your teenager as they learn to drive responsibly, and more.

16. The Defendant's infringing instrumentalities determine and analyze vehicle location and routing, in relation to predetermined locations:



To set up Geo-Fences & E-mail Alerts you must login to your GPS Tracking App via your computers web browser at the following link: tracking.global-view.net

1. Log into to your account via your PC's browser at tracking.global-view.net
2. At the home screen click on "Tracking"
3. On the bottom right click on the Pentagon Icon
4. Click on the "+" sign to add a Geo-Fence; see the image below



17. The Defendant's infringing instrumentalities collect and transmit vehicle location, bearing, and speed information:

Movement start	Movement end	Total trips length, mi	Travel time	Average speed, mph	Max. speed, mph	Stops duration
- 32132 Jul 12, 2021 00:00 - Jul 12, 2021 23:59 8						
10:43 - San Seavine Way, Jurupa Valley, California, United States, 92337	10:47 - Riverside County Fire Department Station #17, San Seavine Way, Jurupa Valley, California, United States, 92337	0.72	00:03	14	32	00:05
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18. Plaintiff herein restates and incorporates by reference paragraphs 11 – 17, above.

19. All recited elements of – at least – claims 1, 12, 15, and 26 of the '471 Patent are present within Defendant's infringing instrumentalities.

20. Defendant's infringing instrumentalities monitor a vehicle.

21. Defendant's infringing instrumentalities detect movement or activation of a vehicle, and transmit signals indicating movement or activation of a vehicle to a control center.

22. Defendant's infringing instrumentalities transmit received operator identification information to a control center.

23. Defendant's infringing instrumentalities detect a vehicle's proximity to a landmark.

24. Defendant's infringing instrumentalities utilize GPS transceivers co-located with the vehicle to transmit location coordinates of the vehicle.

25. Defendant's infringing instrumentalities infringe – at least – claims 1, 12, 15, and 26 of the '471 Patent.

26. Defendant's infringing instrumentalities literally and directly infringe – at least – claims 1, 12, 15, and 26 of the '471 Patent.

27. Defendant's infringing instrumentalities perform or comprise all required elements of – at least – claims 1, 12, 15, and 26 of the '471 Patent.

28. In the alternative, Defendant's infringing instrumentalities infringe – at least – claims 1, 12, 15, and 26 of the '471 Patent under the doctrine of equivalents. Defendant's infringing instrumentalities perform substantially the same functions in substantially the same manner with substantially the same structures, obtaining substantially the same results, as the required elements of – at least – claims 1, 12, 15, and 26 of the '471 Patent. Any differences between Defendant's infringing instrumentalities and the claims of the '471 Patent are insubstantial.

29. All recited elements of – at least – claims 1, 12, 15, and 26 of the '471 Patent are present within, or performed by, Defendant's infringing instrumentalities.

30. Defendant's infringing instrumentalities, when used and/or operated in their intended manner or as designed, infringe – at least – claims 1, 12, 15, and 26 of the '471 Patent, and Defendant is therefore liable for infringement of the '471 Patent.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

- a. A judgment in favor of Plaintiff that Defendant has infringed the '471 Patent;
- b. A permanent injunction enjoining Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith, from infringement of the '471 Patent;
- c. A judgment and order requiring Defendant to pay Plaintiff its damages, costs, expenses, and pre-judgment and post-judgment interest for Defendant's infringement of the '471 Patent as provided under 35 U.S.C. § 284;
- d. An award to Plaintiff for enhanced damages resulting from the knowing and

deliberate nature of Defendant's prohibited conduct with notice being made at least as early as the service date of this complaint, as provided under 35 U.S.C. § 284;

e. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees; and

f. Any and all other relief to which Plaintiff may show itself to be entitled.

March 29, 2023

Respectfully Submitted,

By: /s/ Ronald W. Burns

Ronald W. Burns (*Lead Counsel*)

Texas State Bar No. 24031903

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**ATTORNEY FOR PLAINTIFF
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