

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ARTAX, LLC,

Plaintiff,

v.

SAMSARA INC.,

Defendant.

Case No.

Jury Trial Demanded

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Artax, LLC (“Artax”) files this Complaint against Defendant Samsara Inc., (“Samsara”) for patent infringement of United States Patent Nos. 8,019,581; 8,169,343; and 8,509,412 (the “Patents-In-Suit”), and alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

THE PARTIES

2. Artax is a limited liability company organized under the laws of the State of Texas with its principal place of business at 17330 Preston Road, Suite 200D, Dallas, Texas 75252.

3. Samara is a corporation organized and existing under the laws of Delaware. Upon information and belief, Samsara sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services that perform infringing processes into the stream of commerce knowing that they would be used, offered for sale, or sold in this judicial district and elsewhere in the United States.

4. Defendant Samsara has a regular and established place of business located at 1170 Peachtree Street, 9th Floor, Atlanta, Georgia, 30309.

5. Samsara may be served through its registered agent, CT Corporation System, 289 S. Culver Street, Lawrence, Georgia 30046-4805.

6. On information and belief, Samsara has made, used, offered to sell and/or sold products and services, including the following specifically accused products and services: (1) Samsara Driver app;¹ (2) Samsara Connected Operations Cloud;² (3) Samsara GPS Fleet Tracking;³ (4) current or legacy Samsara products

¹ See <https://developers.samsara.com/docs/routing-guide>.

² See <https://www.samsara.com/products/platform#impact0>.

³ See <https://www.samsara.com/products/telematics/gps-fleet-tracking/>

or services, which use, or have used, one or more of the foregoing products and services as a component product or component service; (5) combinations of products and/or services comprising, in whole or in part, two or more of the foregoing products and services; (6) and all other current or legacy products and services imported, made, used, sold, or offered for sale by Samsara that operate, or have operated in a substantially similar manner as the above-listed products and services. (As used herein, one or more of the foregoing products and services are individually and collectively referred to as the accused “Samsara Products and Services”).

7. On information and belief, Samsara, as well as the hardware and software components comprising the Samsara Products and Services and/or that enable the Samsara Products and Services to operate infringes (literally and/or under the doctrine of equivalents) at least one claim of each of the Patents-in-suit.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 and 1338, as this action arises under the patent laws of the United States (35 U.S.C. §§ 1 et seq.).

9. Personal jurisdiction exists generally over the Defendant because the Defendant has sufficient minimum contacts and/or has engaged in continuous and systematic activities in the forum as a result of business conducted within Georgia, including in the Northern District of Georgia. Personal jurisdiction also exists over

the Defendant because it, directly or through subsidiaries, makes, uses, sells, offers for sale, imports, advertises, makes available, and/or markets products and/or services within Georgia, including in the Northern District of Georgia, that infringe one or more claims of the Patents-In-Suit. Further, on information and belief, Defendant has placed or contributed to placing infringing products and/or services into the stream of commerce knowing or understanding that such products and/or services would be sold and used in the United States, including in this District.

10. Venue is proper in the Northern District of Georgia pursuant to 28 U.S.C. §1400(b), including but not limited to because Samsara has committed acts of infringement in this District and has regular and established places of business in this District. By way of example and without limitation, Samsara makes, uses, sells, offers to sell, and/or imports products and/or services that are accused of infringing the Patents-In-Suit into and/or within this District and maintains a permanent and/or continuing presence within this District, including the place of business located at 1170 Peachtree Street, 9th Floor, Atlanta, Georgia, 30309.

PATENTS-IN-SUIT

United States Patent No. 8,019,581

11. On September 13, 2011, the USPTO duly and legally issued United States Patent No. 8,019,581 (“the ‘581 Patent”) entitled “System and Method System for Providing Routing, Mapping, and Relative Position Information to Users of a

Communication Network” to inventors Michael A. Sheha, Stephen Petilli, and Angie Sheha. A true and correct copy of the ‘412 Patent is attached as Exhibit A.

12. The ‘581 Patent is valid and enforceable under United States Patent Laws.

13. Artax owns all rights, title, and interest in the ‘581 Patent.

14. Artax has not granted Samsara an approval, an authorization, or a license to the rights under the ‘581 Patent.

15. The ‘581 Patent relates to, among other things, a method and system for presenting navigational directions using a combination of a mobile communication device, such as a cellular phone, and a complementary device, such as a vehicular navigational device or display device.

16. The claimed invention(s) of the ‘581 Patent sought to solve problems with, and improve upon, existing navigational systems that relied upon stored information from a local database or navigational information storage system, such as a DVD disc or CD-ROM discs. For example, the ‘581 Patent states:

Determining a local position in a navigation system has typically been done by integrating or connecting Global Positioning System (GPS) technology into the local navigational system. New positioning determination systems include network-assisted wireless location systems, such as TOA (Time-of-Arrival), and network assisted GPS systems for determining the local navigation system’s position. The unit’s location is then displayed on the device and is available for various applications, such as in the case of a commuter seeking the shortest route to

a location in a specific area or a user wanting to find the nearest gas station.

Destination locations are typically determined by manually accessing stored information from a local database or navigational information storage system, such as a DVD disc or CD-ROM discs. Location information is found by searching through categories of information until the desired location is found, or alternatively, by cross referencing telephone numbers with addresses by means of the local storage system. Conventionally, numerous discs, or even numerous sets of discs, are required to provide adequate detailed geographic coverage, including address and telephone information about a given metropolitan area. That is, conventional in-vehicle navigation systems require that an extensive collection of storage discs be carried within the vehicle. Additionally, prior art DVD and CD-ROM disc based systems require periodic updating. That is, even after a user has purchased a set of discs, new replacement discs must be acquired, for example, as new roads and points of interest information are updated.

As an additional drawback, some navigation systems that do not have the storage capability, such as wireless PDAs (Personal Digital Assistant) or typical cell phones, are not able to implement cross referencing of telephone numbers to addresses locally due to the large memory and storage size requirements of such an operation and low computational power of the devices. Furthermore, since most businesses and individuals can change their telephone numbers numerous times while at their current address determining destination locations from telephone numbers on a locally-stored database inherently causes the information to be out of date and inaccurate. These and other changes, such as a new telephone line or an area code change, would invalidate the current version of locally-stored DVD or CD-ROM disc information. As a further drawback, mobile navigation devices and stationary landline computing devices are not always associated with

telephone numbers, but rather Internet Protocol (IP) addresses or the like.

‘581 Patent, 1:37-2:16.

17. The ‘581 Patent then states:

Thus, a need exists for a system that determines local and/or remote position information which does not require an extensive collection of DVD or CD-ROM discs, which is able to provide location and destination address or position information given a telephone number, and which is up-to-date and reliable and can be accessed via a networked online server(s). Additionally, the need exists for a system that determines local and/or remote position information of devices that are not always associated by telephone numbers, but IP addresses or the like, and which can obtain such position information instantaneously and share it, by means of authentication and authorization protocols, without requiring any prior configuration.

‘581 Patent, 2:44-56.

18. The invention(s) claimed in the ‘581 Patent solves various technological problems inherent in the then-existing existing navigational systems to, among other things, function more efficiently.

United States Patent No. 8,169,343

30. On May 5, 2012, the USPTO duly and legally issued United States Patent No. 8,169,343 (“the ‘343 Patent”) entitled “Method and System for Saving and Retrieving Spatial Related Information” to inventors Michael A. Sheha, Angie Sheha, Stephen Petilli, and Mark Goddard. A true and correct copy of the ‘412 Patent is attached as Exhibit B.

31. The '343 Patent is valid and enforceable under United States Patent Laws.

32. Artax owns all rights, title, and interest in the '343 Patent.

33. Artax has not granted Samsara an approval, an authorization, or a license to the rights under the '343 Patent.

34. The '343 Patent relates to, among other things a method and apparatus for storing, referencing, retrieving, and graphically displaying spatial and non-spatial related information of a mobile computing device, such as a laptop computer or a cellular telephone.

35. The claimed invention(s) of the '343 Patent sought to solve problems with, and improve upon navigational methods and systems for:

- 1). storing spatial and non-spatial related information; 2). referencing or linking spatial and non-spatial related information (i.e., stop points, images, forms, e-mail or instant messages, voice recordings, waypoints, etc.); 3). retrieving both spatial and non-spatial related information; 4). graphically displaying spatial and non-spatial related information in a temporal or indexed format; 5). utilizing spatial and non-spatial related information with a route or trip planner; and 6). allowing the capability to share spatial and non-spatial related information amongst multiple users.

'343 Patent, 1:21-30.

36. For example, the '343 Patent states:

Thus, a need exists for a method and system that allows the ability to store spatial and non-spatial related Meta data,

reference or link spatial and non-spatial related Meta data, while providing a graphical display for viewing spatial and non-spatial related information in a temporal or indexed format, such as a Calendar or Gantt view, and provide a method and system for retrieving both spatial and non-spatial related Meta data. This provides many important benefits for GPS-related devices, such as GPS-enabled wireless cell phones with integrated cameras, that transmit spatial (i.e., location) and non-spatial information (i.e., images, forms, e-mail or instant messages, voice recordings, waypoints, etc.) for the purpose of utilizing Meta information in a powerful graphical application.

‘343 Patent, 1:49-62.

37. The invention(s) claimed in the ‘343 Patent solves various technological problems inherent in the then-existing existing navigational systems to, among other things, function more efficiently.

United States Patent No. 8,509,412

38. U.S. Patent No. 8,509,412 (the “‘412 Patent”) is titled “System and Method For Providing Routing, Mapping, And Relative Position Information to Users of A Communication Network” and was issued on August 13, 2013. A true and correct copy of the ‘412 Patent is attached as Exhibit C.

39. The ‘412 Patent was filed on December 2, 2011 as U.S. Patent Application No. 13/373,841.

40. Plaintiff is the owner of all rights, title, and interest in and to the ‘412 Patent, with the full and exclusive right to bring suit to enforce the ‘412 Patent, including the right to recover for past infringement.

41. The '412 Patent is valid and enforceable under United States Patent Laws.

42. The '412 Patent recognized problems with existing location and navigational systems at the time of the invention of the '412 Patent.

43. For instance, the inventors of '412 Patent recognized that prior art navigational systems require an extensive collection of storage discs, and “new replacement discs must be acquired,” even after “a user has purchased a set of discs.” Ex. C, '412 Patent, 1:47-64. The inventors also recognized that the locally stored location information will be out of date and inaccurate if it relied on cross-referencing telephone numbers with addresses. *Id.* at 2:4-16.

44. The inventors of the '412 Patent recognized that the prior art is “incapable of obtaining position information over dynamically-configured connections.” *Id.* at 2:17-21. The inventors recognized the prior art “require[s] users to register each device’s network address into a database” for which the creation procedures are “static and not dynamic.” *Id.* at 2:22-43. The inventors recognized that organizations that use the static systems must “shut down the outside account and possibly change the network address for security purposes.” *Id.*

45. The inventors of the '412 Patent recognized the drawbacks are overcome by “the position determination, mapping, and routing system disclosed”

that “assist the user, or a software application, in determining local and/or remote position(s) by using an online database and/or networked authentication and authorization connection server.” *Id.* at 4:3-14. The inventors of the ‘412 Patent further recognized that the drawbacks are overcome by providing the user’s wireless device position information, which includes address information, GPS position information, and nearby fixed location information. *Id.* at 3:52-57, 9:61-10:5.

46. In view of the foregoing, among other advantages over the prior art, the inventions claimed by the ‘412 Patent provide the benefits of providing real-time position information of one party to another party. *Id.* at 2:60-4:3.

CLAIMS FOR RELIEF

Count I – Infringement of United States Patent No. 8,019,581

47. Artax repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

48. On information and belief, Samsara (or those acting on its behalf) makes, uses, sells, imports and/or offers to sell the Samsara Connected Operations Cloud that infringes (literally and/or under the doctrine of equivalents) at least claim 1 of the ‘581 Patent. Claim 1 recites as follows:

[1pre] A method for presenting navigational information using a wireless communication device including a GPS receiver, said method comprising:

[1a] receiving location information of said wireless communication device using said GPS receiver of said wireless communication device, said location information indicating a location of said wireless communication device;

[1b] receiving destination information, said destination information indicating a location of a destination;

[1c] sending, from said wireless communication device, a request for navigational information, said navigational information including route information for traveling between said location of said wireless communication device and said location of said destination, wherein said request for navigation information is sent to a server over a telecommunication network;

[1d] wherein the server queries a remote party of position request for permission on whether the position request can be granted based on criteria;

[1e] receiving, by said wireless communication device from said server over said telecommunication network, said navigational information;

[1f] sending, from said wireless communication device to an in-vehicle navigational device, said navigational information generated with said wireless communication device; and

[1g] displaying, at a display device of said in-vehicle navigational device, driving directions for traveling between said location of said wireless communication device and said location of said destination based on said navigation information received from said wireless communication device.

49. On information and belief, one or more components of the Samsara Connected Operations Cloud employs and provides a method for presenting

navigational information using a wireless communication device including a GPS receiver.

Transform your business with the Connected Operations Cloud

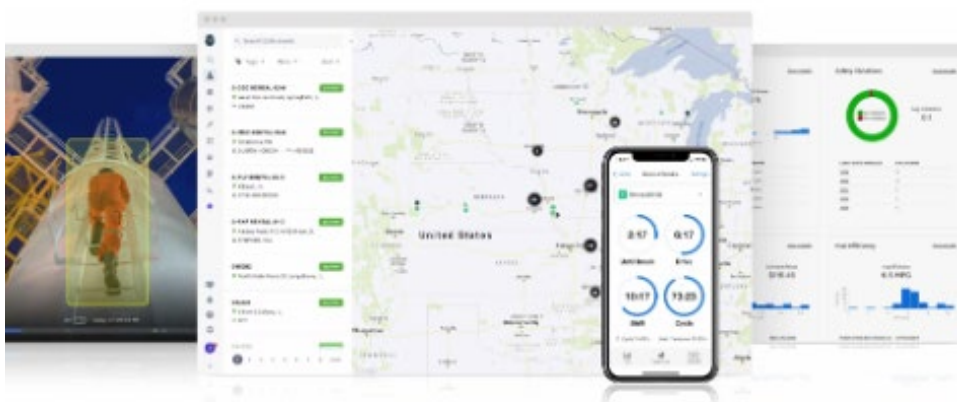


Figure 1 1: 1pre(1)

<https://www.samsara.com/products/platform/#impact0>

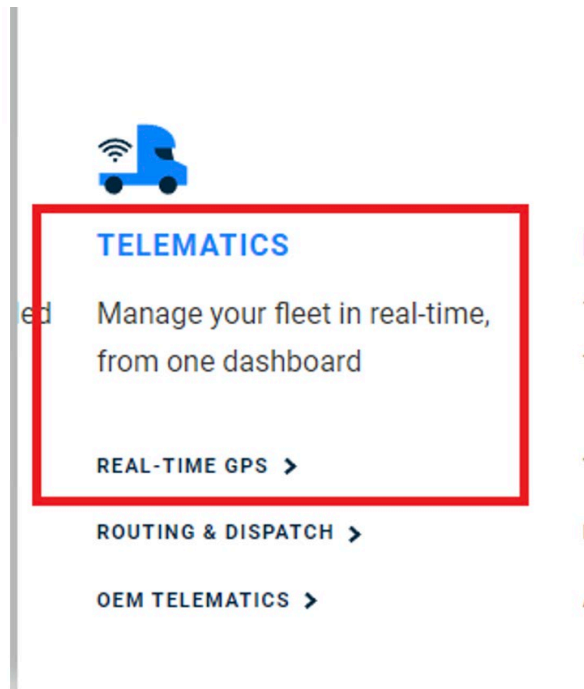


Figure 1-2: 1pre(2)

<https://www.samsara.com/products/platform/#impact3>

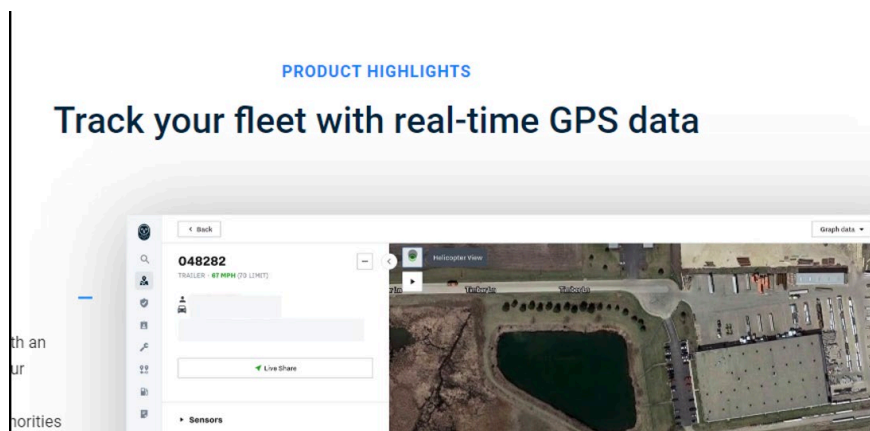


Figure 1-3: 1pre(3)

<https://www.samsara.com/products/telematics/gps-fleet-tracking/>

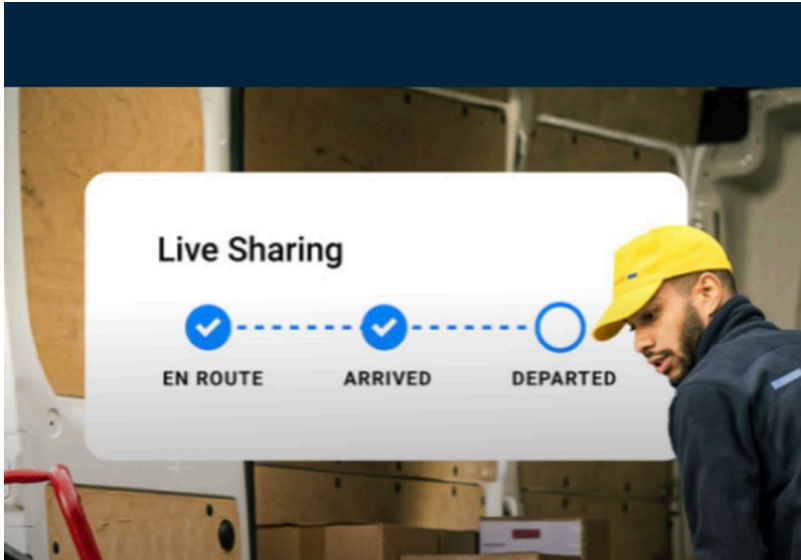


Figure 1-4: 1pre(4)

https://www.samsara.com/?utm_source=google&utm_campaign=branded&utm_medium=search&utm_content=e&utm_term=samsara&utm_ext_ad_id=aud-453437105239%3Akwd-52447431&utm_ext_adset_id=30991784774&utm_ext_campaign_id=609524294&gclid=CjwKCAjwkYGVBhArEiwA4sZLuIvgFu7mref39uARnpEuv0cDR57wL9q0Vnyj-EDgA8Z1tas9nEz7phoC2kUQAvD_BwE

50. On information and belief, one or more components of the Samsara Connected Operations Cloud employs and provides a method for presenting navigational information using a wireless communication device including a GPS receiver comprising the step of receiving location information of said wireless communication device using said GPS receiver of said wireless communication device, said location information indicating a location of said wireless communication device.

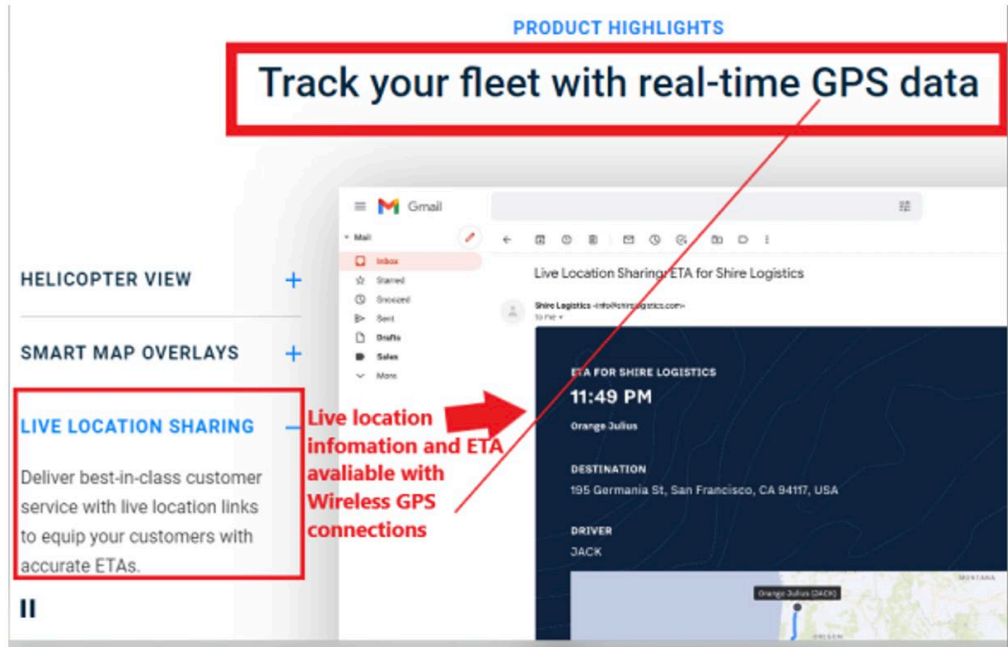


Figure 1-5: 1a(1)

<https://www.samsara.com/products/telematics/gps-fleet-tracking/>

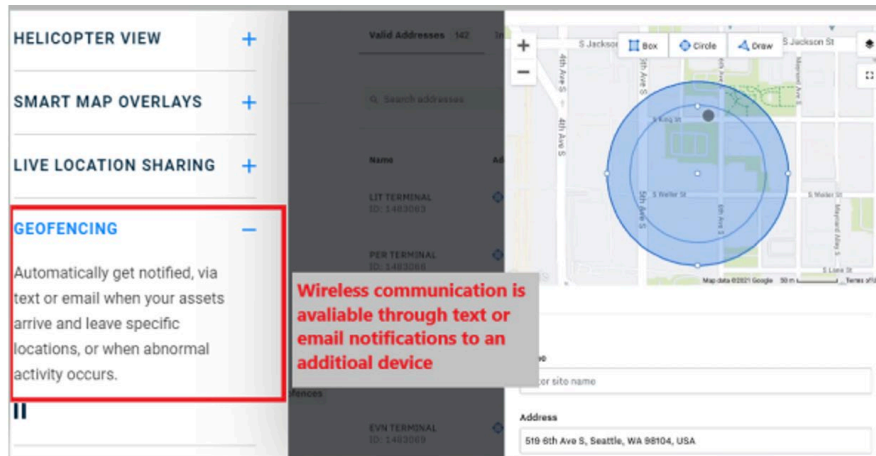


Figure 1-6: 1a(2)

Id.

51. On information and belief, one or more components of the Samsara Connected Operations Cloud employs and provides presenting navigational

information using a wireless communication device including a GPS receiver comprising the step of receiving destination information, said destination information indicating a location of a destination.

Addresses
Create and manage known locations

Samsara has a feature called an **Address Book** that allows you to specify locations of interest and collect useful data about operations at each one.

All Addresses contain the following fields:

Field	Description
formattedAddress	The street address. Example: 1990 Alameda Street, San Francisco, CA 94103
geofence	Either a circular or a polygonal geofence.
name	A user-provided name.

Figure 1-7: 1b(1)

<https://developers.samsara.com/docs/addresses-guide>

samsara

CHECK OUR PRICES

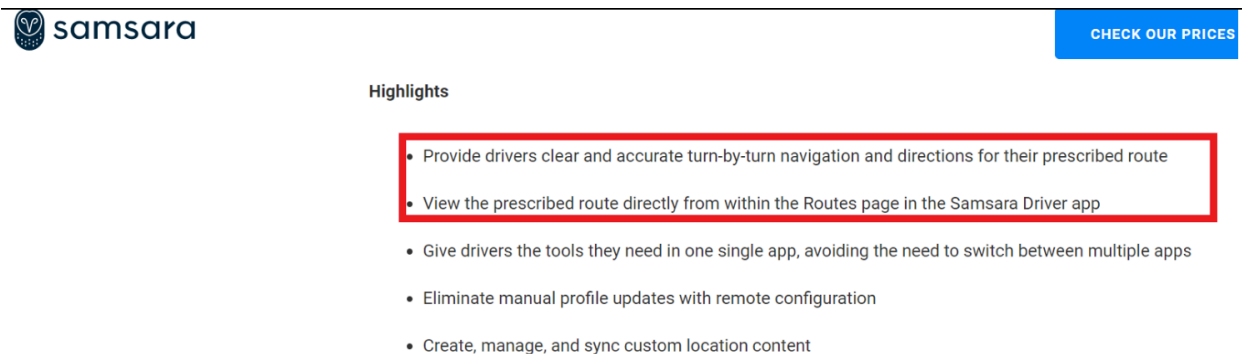
Highlights

- Provide drivers clear and accurate turn-by-turn navigation and directions for their prescribed route
- View the prescribed route directly from within the Routes page in the Samsara Driver app
- Give drivers the tools they need in one single app, avoiding the need to switch between multiple apps
- Eliminate manual profile updates with remote configuration
- Create, manage, and sync custom location content

Figure 1-8: 1b(2)

<https://kb.samsara.com/hc/en-us/articles/360043043512-Route-Optimization>

52. On information and belief, one or more components of the Samsara Connected Operations Cloud employs and provides presenting navigational information using a wireless communication device including a GPS receiver comprising the step of sending, from said wireless communication device, a request for navigational information, said navigational information including route information for traveling between said location of said wireless communication device and said location of said destination, wherein said request for navigation information is sent to a server over a telecommunication network.



The screenshot shows the Samsara logo on the left and a blue button labeled "CHECK OUR PRICES" on the right. Below the logo is the word "Highlights" followed by a list of five bullet points. The first two bullet points are enclosed in a red rectangular box:

- Provide drivers clear and accurate turn-by-turn navigation and directions for their prescribed route
- View the prescribed route directly from within the Routes page in the Samsara Driver app
- Give drivers the tools they need in one single app, avoiding the need to switch between multiple apps
- Eliminate manual profile updates with remote configuration
- Create, manage, and sync custom location content

Figure 1-9: 1c(1)

<https://developers.samsara.com/docs/routing-guide>

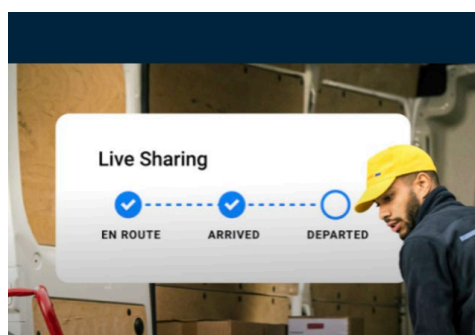


Figure 1-10: 1c(2)

<https://www.samsara.com/guides/>

53. On information and belief, one or more components of the Samsara Connected Operations Cloud employs and provides a presenting navigational information using a wireless communication device including a GPS receiver wherein the server queries a remote party of position request for permission on whether the position request can be granted based on criteria.

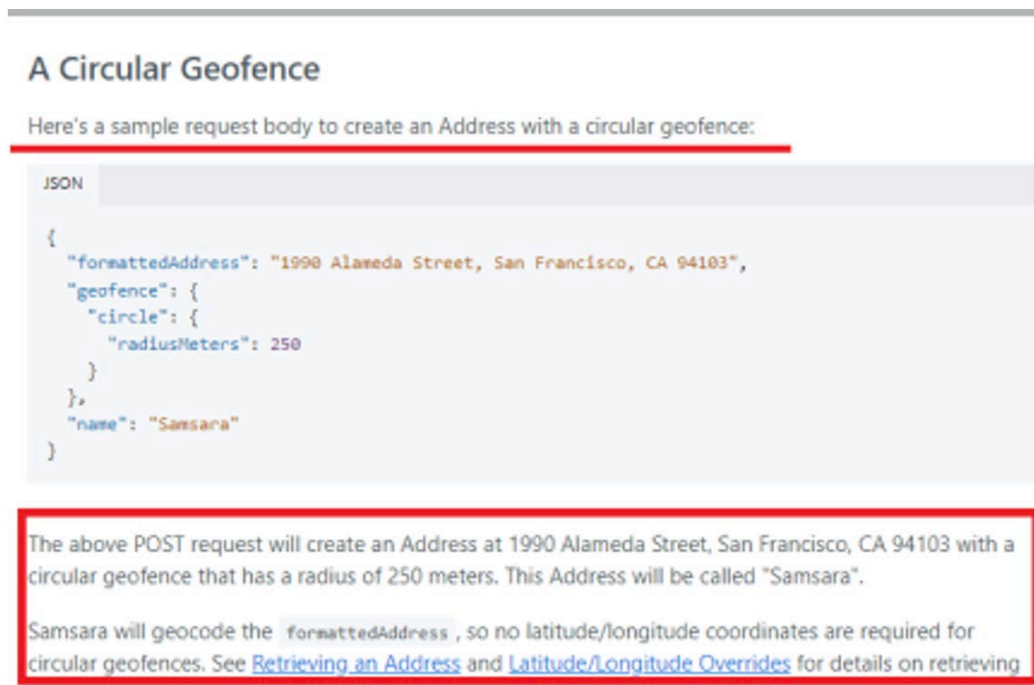


Figure 1-11: 1d(1)

<https://developers.samsara.com/docs/addresses-guide>

54. On information and belief, one or more components of the Samsara Connected Operations Cloud employs and provides presenting navigational information using a wireless communication device including a GPS receiver

comprising the step of receiving, by said wireless communication device from said server over said telecommunication network, said navigational information.

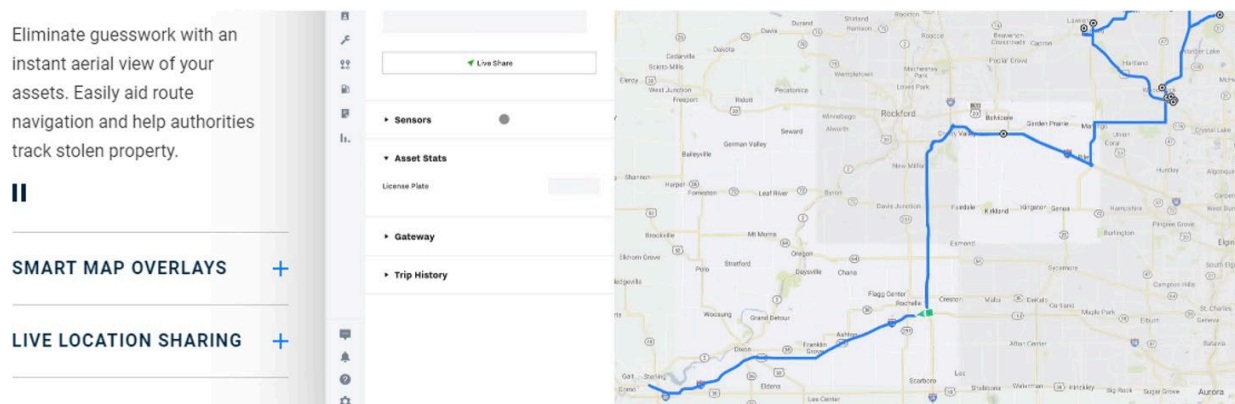


Figure 1-12: 1e(1)

<https://www.samsara.com/products/telematics/>

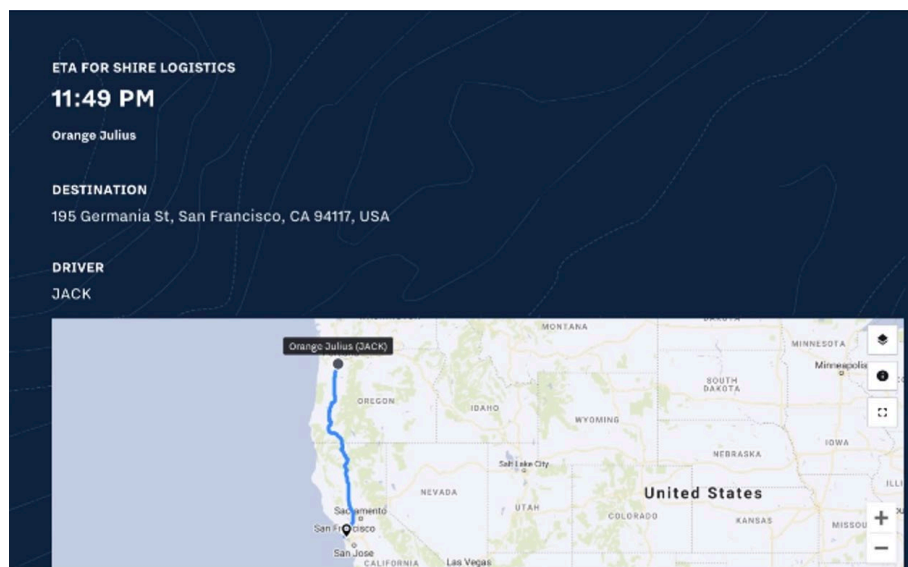


Figure 1-13: 1e(2)

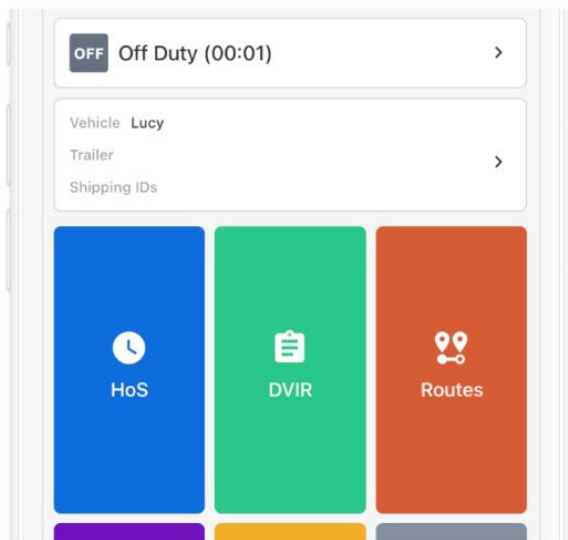
<https://www.samsara.com/products/telematics/gps-fleet-tracking/>

55. On information and belief, one or more components of the Samsara Connected Operations Cloud employs and provides presenting navigational

information using a wireless communication device including a GPS receiver comprising the step of sending, from said wireless communication device to an in-vehicle navigational device, said navigational information generated with said wireless communication device.

After you [Select a Vehicle or Trailer](#) from the Samsara Driver App, you can view routes scheduled for the next 30 days and start any routes scheduled for the current day.

1. From the Samsara Driver App home screen, tap **Routes**.



2. If dispatch has assigned you or your vehicle a route, tap the route summary to review the stops and dispatch route notes. If your fleet permits driver selection of unassigned routes, tap **Add route** to view unassigned routes.

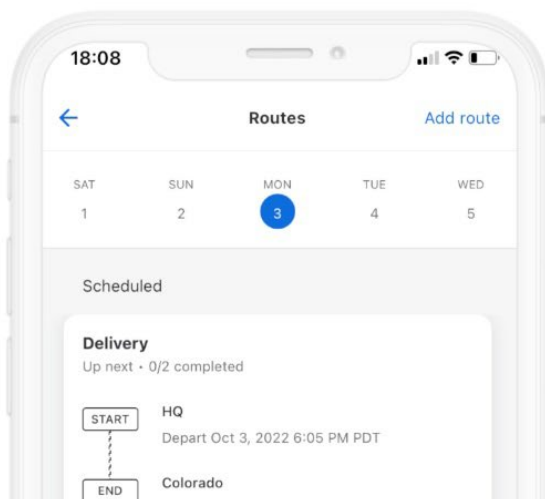


Figure 1-14: 1f(1)

<https://kb.samsara.com/hc/en-us/articles/360041258291-View-Start-and-Complete-Routes>

Lock Mobile Device to Vehicle (Mounted Devices)

Have you mounted a mobile device (Tablet or Smartphone) for the **Samsara Driver App** within one of your vehicles?

You can now ensure that every driver who signs in on that device is automatically associated with that vehicle using the **Lock Device to Vehicle** feature.

Figure 1-15: 1f(2)

<https://kb.samsara.com/hc/en-us/articles/115002712353-Lock-Mobile-Device-to-Vehicle-Mounted-Devices->

56. On information and belief, one or more components of the Samsara Connected Operations Cloud employs and provides presenting navigational information using a wireless communication device including a GPS receiver comprising the step of displaying, at a display device of said in-vehicle navigational device, driving directions for traveling between said location of said wireless communication device and said location of said destination based on said navigation information received from said wireless communication device.

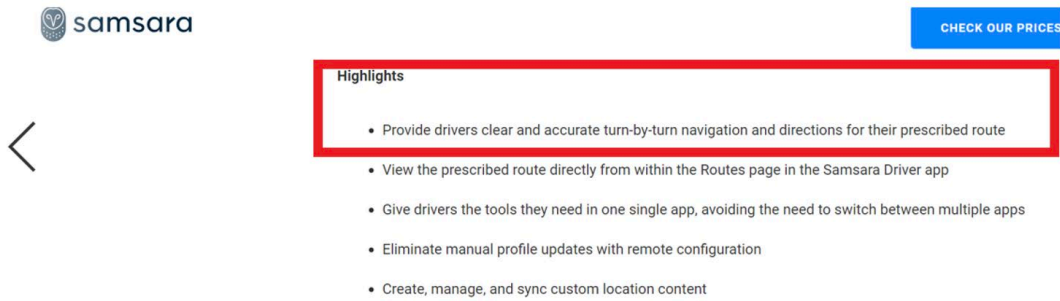


Figure 1-16: 1g(1)

<https://kb.samsara.com/hc/en-us/articles/360043043512-Route-Optimization>

Lock Mobile Device to Vehicle (Mounted Devices)

Have you mounted a mobile device (Tablet or Smartphone) for the **Samsara Driver App** within one of your vehicles?

You can now ensure that every driver who signs in on that device is automatically associated with that vehicle using the **Lock Device to Vehicle** feature.

Figure 1-17: 1g(2)

<https://kb.samsara.com/hc/en-us/articles/115002712353-Lock-Mobile-Device-to-Vehicle-Mounted-Devices->

57. On information and belief, Samsara directly infringes at least claim 1 of the '581 Patent, and is in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Samsara Connected Operations Cloud.

58. Samsara's direct infringement has caused Artax to suffer and continue to suffer damages in an amount that is no less than a reasonable royalty.

Count II – Infringement of United States Patent No. 8,169,343

59. Artax repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

60. On information and belief, Samsara (or those acting on its behalf) makes, uses, sells, imports and/or offers to sell Samsara Driver App that infringes (literally and/or under the doctrine of equivalents) at least claim 1 of the ‘581 Patent. Claim 1 recites as follows:

[1pre] A machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route, the method comprising the steps of:

[1a] receiving presence information including a start time, an end time, an origin point, and a destination point;

[1b] determining at least one stop point associated with the presence information, each of the at least one stop point associated with a duration indicating an expected period of time to be spent at the stop point;

[1c] adding each of the at least one stop point to the route, each of the at least one stop point between the starting point and the destination point;

[1d] determining a route between the origin point and the destination point, the route including each of the at least one stop point;

[1e] providing direction in response to the route;

[1f] estimating a travel time for the route in response to the duration associated with each of the at least one stop;

[1g] comparing the travel time with a duration between the start time and the end time of the presence information; and

[1h] updating the presence information in response to the comparison.

61. On information and belief, one or more components of Samsara Driver App employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route.

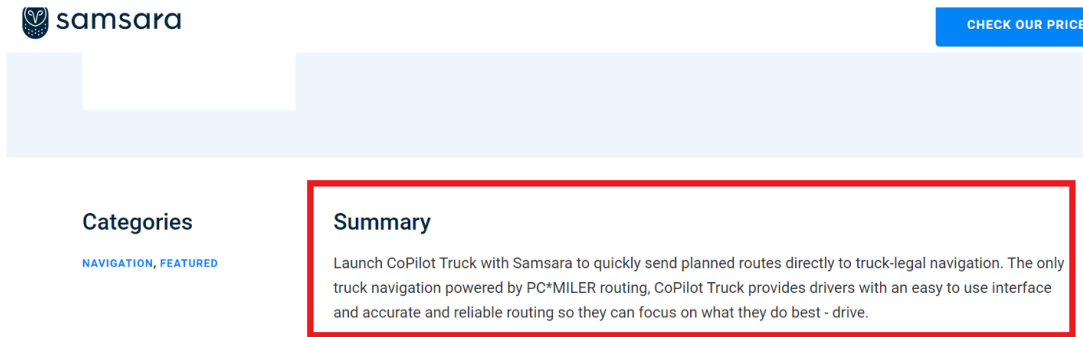


Figure 2-1: 1pre(1)

<https://developers.samsara.com/docs/getting-started>

Routing

Create, manage, and track routes and driver workflow



CHECK OUR PRICES

Highlights

- Provide drivers clear and accurate turn-by-turn navigation and directions for their prescribed route
- View the prescribed route directly from within the Routes page in the Samsara Driver app
- Give drivers the tools they need in one single app, avoiding the need to switch between multiple apps
- Eliminate manual profile updates with remote configuration
- Create, manage, and sync custom location content

Figure 2-2: 1pre(2)

<https://developers.samsara.com/docs/routing-guide>

62. On information and belief, one or more components of Samsara Driver App employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route comprising the step of receiving presence information including a start time, an end time, an origin point, and a destination point.

To calculate the order of stops, Samsara analyzes which order of stops yields the shortest distance traveled, while keeping the **Start Location** and last stop fixed. After the optimal order is determined, Samsara calculates the **Time on Site** report to determine average stop duration based on recent history.

To determine the planned departure time for each job, Samsara uses either this average duration or a default of 30 minutes if no recent data is available.

Figure 2-3: 1a(1)

<https://kb.samsara.com/hc/en-us/articles/360043043512-Route-Optimization>

Routes ☆

+ Create New Route More Actions ▾

All 88 Scheduled 44 En Route 17 Completed 22

< Today > Tags ▾ Search routes < 1 of 5 >

Assigned To	Route	Scheduled Start ▲	Route Timeliness	Current Status	Current Destination
Placeholder Driver	M084042	Aug 28, 8:00 AM	-----	Completed	
Placeholder Driver	1190211	Aug 28, 4:00 PM	-----	Completed	
Placeholder Driver	1190371	Aug 30, 8:00 AM	-----	Skipped	

Edit
Make a copy
Delete

4. Edit the route details.

See [Plan a Route](#) for details on creating a route including origin and destination locations and arrival and departure time calculations.

Figure 2-4: 1a(2)

https://kb.samsara.com/hc/en-us/articles/4409668581261-Manage-Routes#UUID-f299c19e-00a8-94ae-deb9-7c646ef5a580_section-idm4541477051344032997507721178

through the Driver App if that setting is turned on. See [Creating Routes](#) for details and example code.

Route Stops

A route stop represents the customer location for whom you are servicing one or more orders. Route stops have a number of qualities:

- Route Stop Destination (Geofence)
- Scheduled/actual arrival time of the stop
- Scheduled/actual departure time of the stop
- Stop state information and timestamps (en route, arrived, departed, etc. see [Route Stop Arrival & Configuration](#))
- Notes (to list orders, driver instructions, etc)

Figure 2-5: 1a(3)

<https://developers.samsara.com/docs/routing-guide>

63. On information and belief, one or more components of Samsara Driver App employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route comprising the step of determining at least one stop point associated with the

presence information, each of the at least one stop point associated with a duration indicating an expected period of time to be spent at the stop point.

Route Optimization

For increased flexibility you can also add additional stops and use Samsara to optimize the route so that the driver makes stops in the order that minimizes drive time most. Route optimization is available for routes with a maximum of 20 stops.

Figure 2-6: 1b(1)

https://kb.samsara.com/hc/en-us/articles/4409668581261-Manage-Routes#UUID-f299c19e-00a8-94ae-deb9-7c646ef5a580_section-idm4541477051344032997507721178

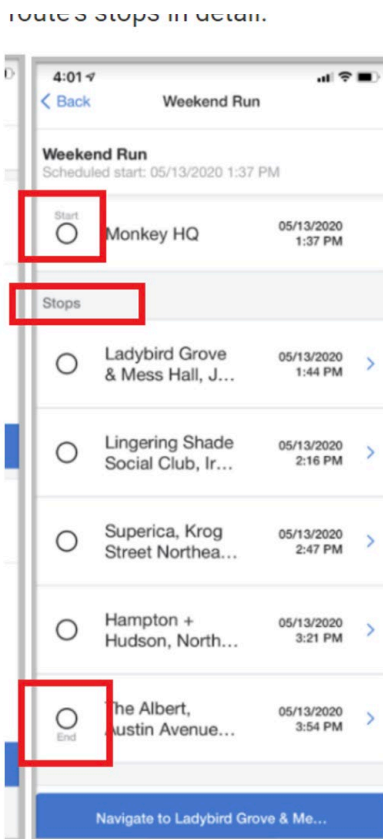


Figure 2-7: 1b(2)

<https://kb.samsara.com/hc/en-us/articles/360043806651-Selecting-Routes-as-a-Driver->

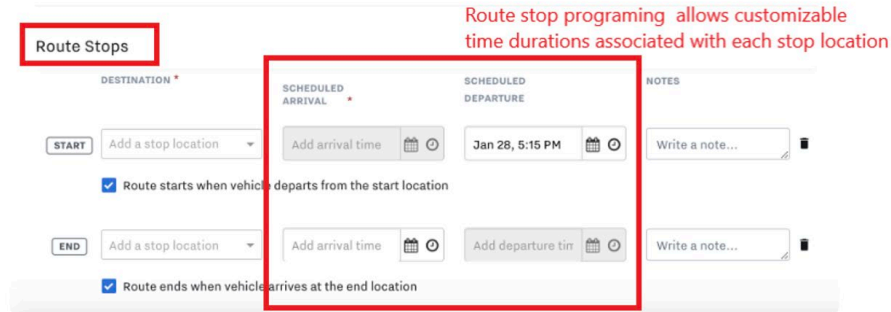


Figure 2-8: 1b(3)

https://kb.samsara.com/hc/en-us/articles/4409668581261-Manage-Routes#UUID-f299c19e-00a8-94ae-deb9-7c646ef5a580_section-idm4541477051344032997507721178

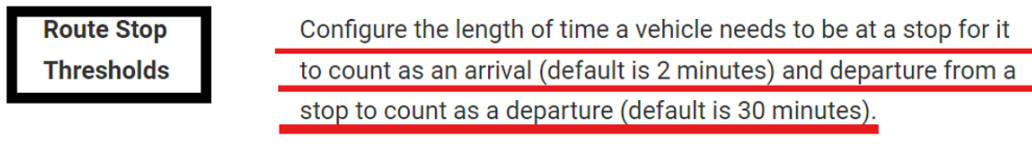


Figure 2-9: 1b(4)

<https://kb.samsara.com/hc/en-us/articles/360043043512-Route-Optimization>

To calculate the order of stops, Samsara analyzes which order of stops yields the shortest distance traveled, while keeping the **Start Location** and last stop fixed. After the optimal order is determined, Samsara calculates the **Time on Site** report to determine average stop duration based on recent history.

To determine the planned departure time for each job, Samsara uses either this average duration or a default of 30 minutes if no recent data is available.

Figure 2-10: 1b(5)

Id.

through the Driver App if that setting is turned on. See [Creating Routes](#) for details and example code.

Route Stops

A route stop represents the customer location for whom you are servicing one or more orders. Route stops have a number of qualities:

- Route Stop Destination (Geofence)
- Scheduled/actual arrival time of the stop
- Scheduled/actual departure time of the stop
- Stop state information and timestamps (en route, arrived, departed, etc. see [Route Stop Arrival & Configuration](#))
- Notes (to list orders, driver instructions, etc)

Figure 2-11: 1b(6)

<https://developers.samsara.com/docs/routing-guide>

64. On information and belief, one or more components of Samsara Driver App employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route comprising the step of adding each of the at least one stop point to the route, each of the at least one stop point between the starting point and the destination point.

8. Define the route schedule and add any stops along the route.

If you add multiple stops, you can **Optimize Route** to enable Samsara to order the stops for the most fastest route. Or, if you want to plan the order of the stops manually, you drag and drop them in the desired order and then **Calculate Departure Times**. See [Departure Times Calculations](#) for more information on departure calculations. Notes added to route stops are visible to drivers in the Samsara Driver App under the respective stop. The route view for fleet administrators does not include the driver notes.

Figure 2-12: 1c(1)

<https://kb.samsara.com/hc/en-us/articles/360043043512-Route-Optimization>

65. On information and belief, one or more components of Samsara Driver App employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route comprising the step of determining a route between the origin point and the destination point, the route including each of the at least one stop point.

8. Define the route schedule and add any stops along the route.

If you add multiple stops, you can **Optimize Route** to enable Samsara to order the stops for the most fastest route. Or, if you want to plan the order of the stops manually, you drag and drop them in the desired order and then **Calculate Departure Times**. See [Departure Times Calculations](#) for more information on departure calculations. Notes added to route stops are visible to drivers in the Samsara Driver App under the respective stop. The route view for fleet administrators does not include the driver notes.

Figure 2-13: 1d(1)

<https://kb.samsara.com/hc/en-us/articles/360043043512-Route-Optimization>

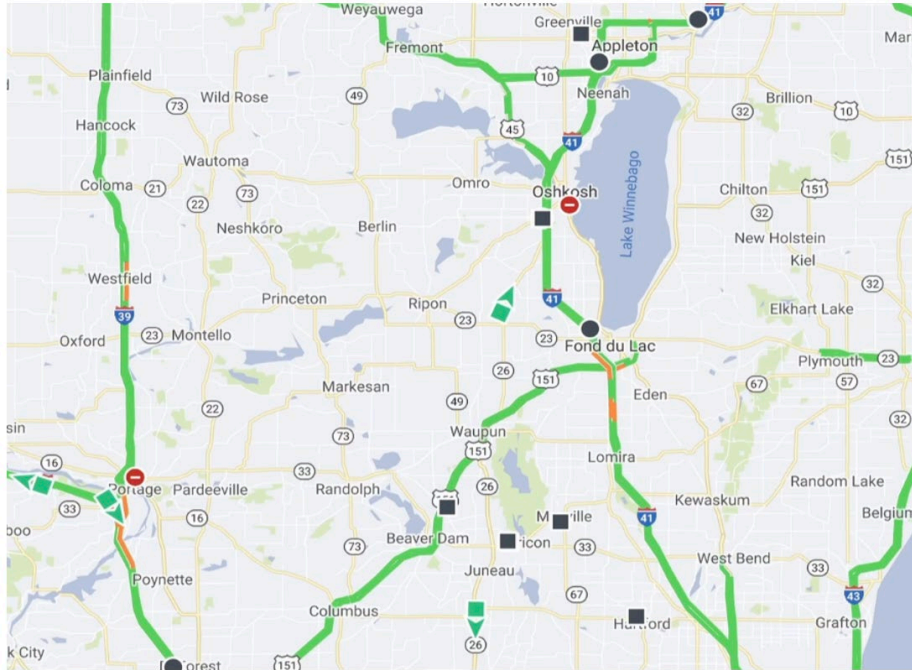


Figure 2-14: 1d(2)

<https://www.samsara.com/products/telematics/>

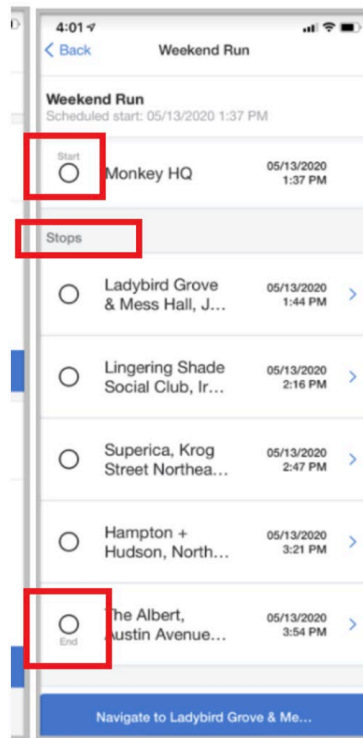


Figure 2-15: 1d(3)

<https://kb.samsara.com/hc/en-us/articles/360043629131-Creating-and-Tracking-a-Route>

66. On information and belief, one or more components of Samsara Driver App employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route comprising the step of providing direction in response to the route.

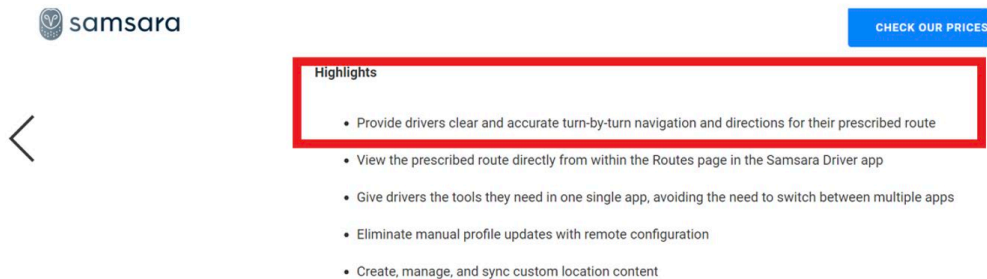


Figure 2-16: 1e(1)

<https://kb.samsara.com/hc/en-us/articles/360043043512-Route-Optimization>

67. On information and belief, one or more components of Samsara Driver App employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route comprising the step of estimating a travel time for the route in response to the duration associated with each of the at least one stop.

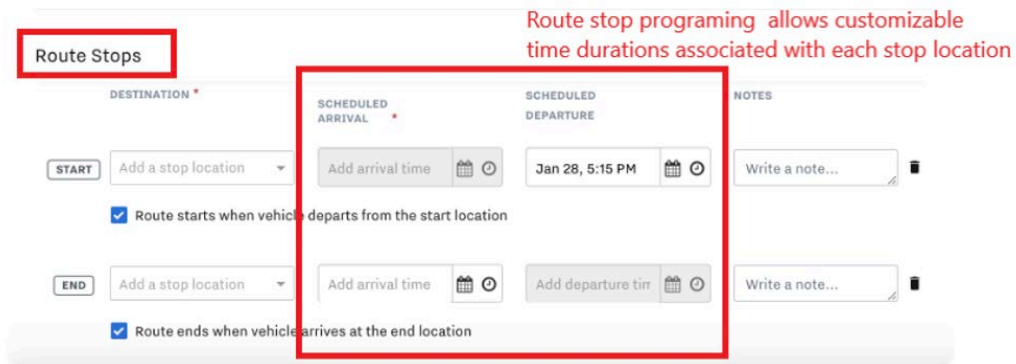
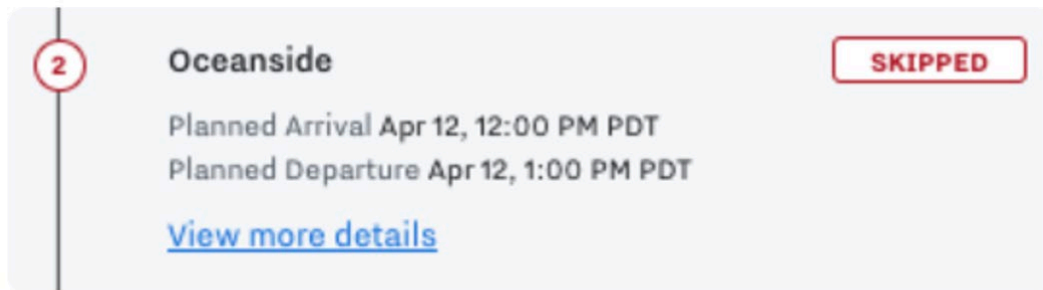


Figure 2-17: 1f(1)

https://kb.samsara.com/hc/en-us/articles/4409668581261-Manage-Routes#UUID-f299c19e-00a8-94ae-deb9-7c646ef5a580_section-idm4541477051344032997507721178



5. From the route Schedule, click **Edit**.

Figure 2-18: 1f(2)

Id.

START TIME	END TIME	Total durations including stop times	START LOCATION	END LOCATION	DISTANCE
26 Jul 18:45	28 Jul 11:42	40h 56m			91.7 km
30 Jul 19:11	1 Aug 11:45	40h 34m			109.4 km
1 Aug 18:45	2 Aug 11:41	16h 56m			109.9 km
25 Jul 18:45	26 Jul 11:40	16h 55m			112.0 km
28 Jul 18:45	29 Jul 11:39	16h 53m			113.7 km

Figure 2-19: 1f(3)

<https://kb.samsara.com/hc/en-us/articles/360043413212-Route-Reports>

68. On information and belief, one or more components of Samsara Driver App employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route comprising the step of comparing the travel time with a duration between the start time and the end time of the presence information.

START TIME	END TIME	Total durations including stop times	START LOCATION	END LOCATION	DISTANCE
26 Jul 18:45	28 Jul 11:42	40h 56m			91.7 km
30 Jul 19:11	1 Aug 11:45	40h 34m			109.4 km
1 Aug 18:45	2 Aug 11:41	16h 56m			109.9 km
25 Jul 18:45	26 Jul 11:40	16h 55m			112.0 km
28 Jul 18:45	29 Jul 11:39	16h 53m			113.7 km

Figure 2-20: 1g(1)

<https://kb.samsara.com/hc/en-us/articles/360043413212-Route-Reports>

69. On information and belief, one or more components of Samsara Driver App employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route comprising the step of updating the presence information in response to the comparison.

Routes

Samsara provides you the ability to create routes that are automatically tracked using the Samsara Vehicle Gateway. The Routing APIs allow you to create, read, update, and delete route plans so that you can sync them with your own applications. Additionally, you can also use the APIs and webhooks to track route progress, provide ETAs, and live-share links to your end customers. See the [Routing API guide](#) for details.

Figure 2-21: 1h(1)

<https://developers.samsara.com/docs/routing-guide>

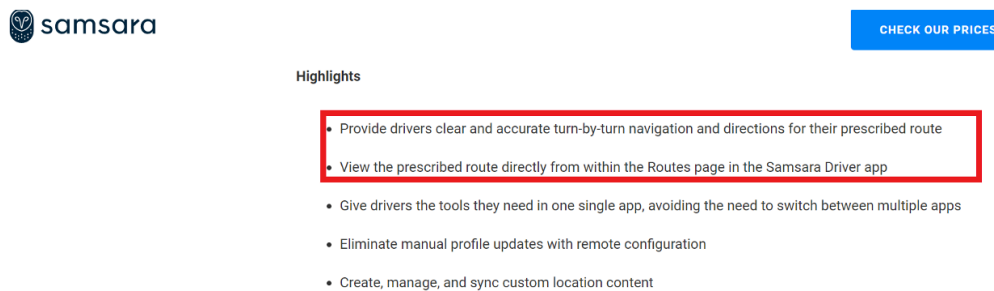


Figure 2-22: 1h(2)

<https://kb.samsara.com/hc/en-us/articles/360043043512-Route-Optimization>

8. Define the route schedule and add any stops along the route.

If you add multiple stops, you can **Optimize Route** to enable Samsara to order the stops for the most fastest route. Or, if you want to plan the order of the stops manually, you drag and drop them in the desired order and then **Calculate Departure Times**. See [Departure Times Calculations](#) for more information on departure calculations. Notes added to route stops are visible to drivers in the Samsara Driver App under the respective stop. The route view for fleet administrators does not include the driver notes.

Figure 2-23: 1h(3)

Id.

70. On information and belief, Samsara directly infringes at least claim 1 of the ‘343 Patent, and is in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Samsara Driver App.

71. Samsara’s direct infringement has caused Artax to suffer and continue to suffer damages in an amount that is no less than a reasonable royalty.

Count III – Infringement of United States Patent No. 8,509,412

72. Artax repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

73. On information and belief, Samsara (or those acting on its behalf) makes, uses, sells, imports and/or offers to sell the Samsara GPS Fleet Tracking that infringes (literally and/or under the doctrine of equivalents) at least claim 1 of the ‘412 Patent. Claim 1 recites as follows:

[1pre] A method of providing position information of a first wireless user device to a second wireless user device of a communication network, comprising:

[1a] receiving first wireless user device information including first phone number information associated with a first wireless user device;

[1b] receiving second user information including second phone number information associated with a second wireless user device;

[1c] receiving first wireless user device position information indicating a real-time location of said first wireless user device; and

[1d] transmitting call-related information including said first wireless user device position information to said second wireless user device.

74. On information and belief, one or more components of Samsara GPS Fleet Tracking employs and provides a method of providing position information of a first wireless user device to a second wireless user device of a communication network.

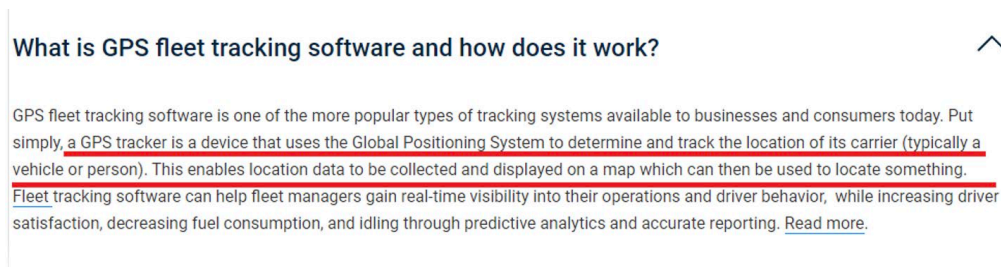


Figure 3-1: 1pre(1)

<https://www.samsara.com/products/telematics/gps-fleet-tracking/>



How does telematics work?

- A vehicle's location is provided to a vehicle telematics device, such as Samsara's vehicle gateway, via a GPS receiver or GRPS. Information is transmitted from the vehicle to a server via a wireless network.
- A telecommunications company manages the flow of information from the vehicle and telematics provider.
- The internet transfers the information from the telematics provider to a computer or mobile device for a fleet manager to access.
- Fleet management for public fleets such as governments and schools use vehicle telematics data to analyze fleet vehicles, vehicle location, service delivery and coverage, driver behavior, community safety, routing, dispatch units, diagnostics, and preventative maintenance so that they can optimize their service their communities and respond to citizens.

Figure 3-2: 1pre(2)

<https://www.samsara.com/guides/what-is-telematics/>



Vehicle telematics

In the automotive or fleet industry, telematics is typically synonymous with vehicle telematics or fleet telematics. Vehicle telematics is used to describe vehicle onboard communication services and applications that communicate with one another via GPS receivers and other telematics devices. The most common application of this is vehicle tracking. This is achieved by combining a GPS system with onboard diagnostics, typically to map the exact location of a vehicle and the speed at which it is moving.

Figure 3-3: 1pre(3)

<https://www.samsara.com/guides/what-is-telematics/>

75. On information and belief, one or more components of Samsara GPS Fleet Tracking employs and provides a method of providing position information of a first wireless user device to a second wireless user device of a communication network comprising the step of receiving first wireless user device information

including first phone number information associated with a first wireless user device.

Vehicle telematics

In the automotive or fleet industry, telematics is typically synonymous with vehicle telematics or fleet telematics. Vehicle telematics is used to describe vehicle onboard communication services and applications that communicate with one another via GPS receivers and other telematics devices. The most common application of this is vehicle tracking. This is achieved by combining a GPS system with onboard diagnostics, typically to map the exact location of a vehicle and the speed at which it is moving.

Figure 3-4: 1a(1)

<https://www.samsara.com/guides/what-is-telematics/>

76. On information and belief, one or more components of Samsara GPS Fleet Tracking employs and provides a method of providing position information of a first wireless user device to a second wireless user device of a communication network comprising the step of receiving second user information including second phone number information associated with a second wireless user device.

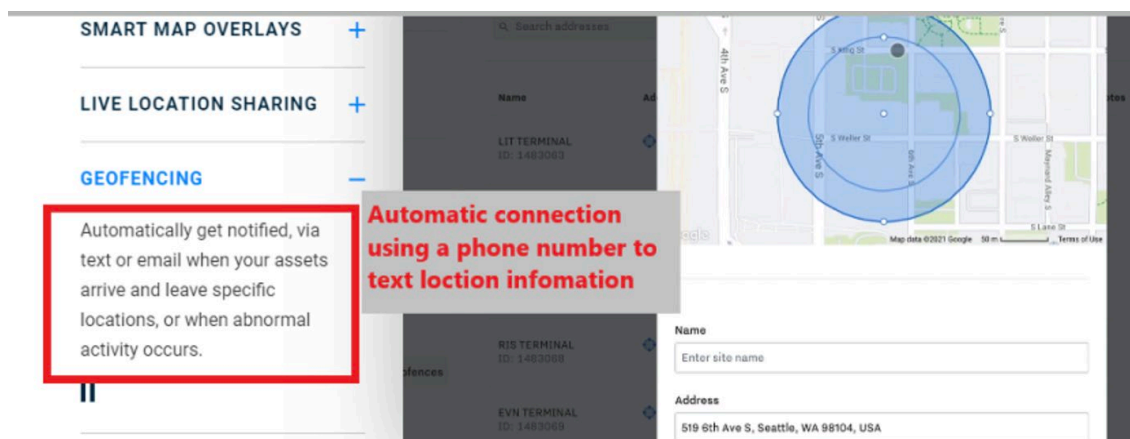


Figure 3-5: 1b(1)

<https://www.samsara.com/products/telematics/gps-fleet-tracking/>

77. On information and belief, one or more components of Samsara GPS Fleet Tracking employs and provides a method of providing position information of a first wireless user device to a second wireless user device of a communication network comprising the step of receiving first wireless user device position information indicating a real-time location of said first wireless user device.

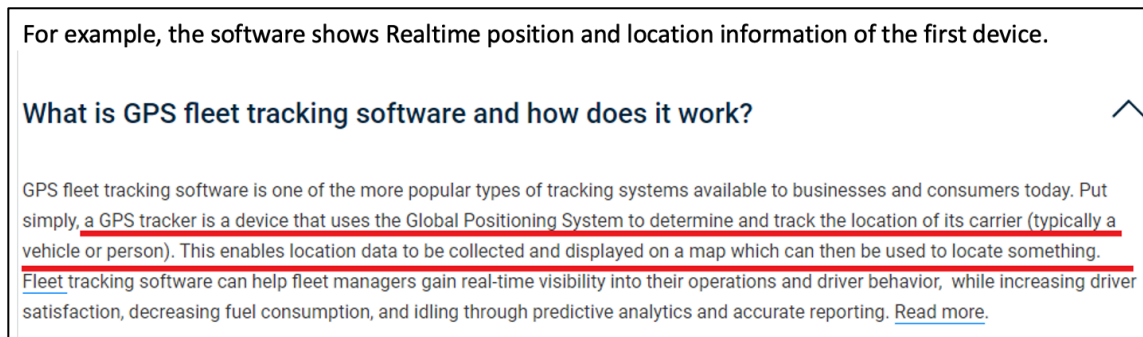


Figure 3-6: 1c(1)

<https://www.samsara.com/products/telematics/gps-fleet-tracking/>

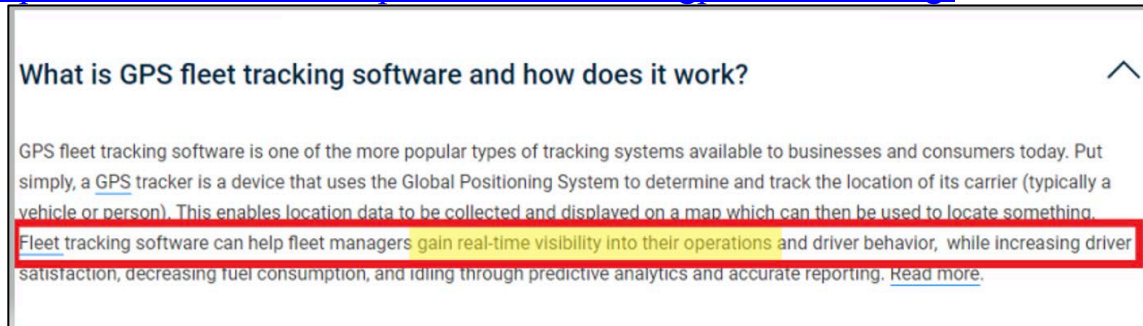


Figure 3-7: 1c(2)

<https://www.samsara.com/products/telematics/gps-fleet-tracking/>

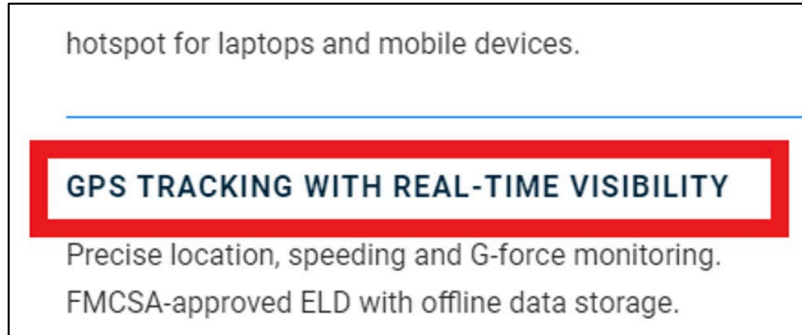


Figure 3-8: 1c(3)

<https://www.samsara.com/products/telematics/>

78. On information and belief, one or more components of Samsara GPS Fleet Tracking employs and provides a method of providing position information of a first wireless user device to a second wireless user device of a communication network comprising the step of transmitting call-related information including said first wireless user device position information to said second wireless user device.



How does telematics work?

- A vehicle's location is provided to a vehicle telematics device, such as Samsara's vehicle gateway, via a GPS receiver or GRPS. Information is transmitted from the vehicle to a server via a wireless network.
- A telecommunications company manages the flow of information from the vehicle and telematics provider.
- The internet transfers the information from the telematics provider to a computer or mobile device for a fleet manager to access.
- Fleet management for public fleets such as governments and schools use vehicle telematics data to analyze fleet vehicles, vehicle location, service delivery and coverage, driver behavior, community safety, routing, dispatch units, diagnostics, and preventative maintenance so that they can optimize their service their communities and respond to citizens.

Figure 3-9: 1d(1)

<https://www.samsara.com/guides/what-is-telematics/>

The '412 Accused Products, thus, transmit call-related information including the first wireless user device position information to the second wireless user device.

79. As a result of Defendant's infringement, Plaintiff has suffered monetary damages, and is entitled to an award of damages adequate to compensate it for such infringement which, by law, can be no less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

80. On information and belief, Samsara directly infringes at least claim 1 of the '412 Patent, and is in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Samsara GPS Fleet Tracking.

81. Samsara's direct infringement has caused Artax to suffer and continue to suffer damages in an amount that is no less than a reasonable royalty.

JURY DEMANDED

82. Pursuant to Federal Rule of Civil Procedure 38(b), Artax hereby requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

Artax respectfully requests this Court to enter judgment in Artax's favor and against Samsara as follows:

- a. finding that Samsara has infringed one or more claims of the '581 Patent under 35 U.S.C. § 271(a);

- b. finding that Samsara has infringed one or more claims of the '343 Patent under 35 U.S.C. § 271(a);
- c. finding that Samsara has infringed one or more claims of the '412 Patent under 35 U.S.C. § 271(a);
- d. awarding Artax damages under 35 U.S.C. § 284, or otherwise permitted by law, including supplemental damages for any continued post-verdict infringement;
- e. awarding Artax pre-judgment and post-judgment interest on the damages award and costs;
- f. awarding cost of this action (including all disbursements) and attorney fees pursuant to 35 U.S.C. § 285, or as otherwise permitted by the law; and
- g. awarding such other costs and further relief that the Court determines to be just and equitable.

Date: April 29, 2024

Respectfully submitted,

/s/ Jacqueline K. Burt

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