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4 Attorneys for Plaintiff
5 ARTAX LLC

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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 ARTAX LLC

11 Plaintiff,

12 vs.

13 TELETRAC NAVMAN US LTD.,

14 Defendant.
15

Case No.: _____

COMPLAINT

16
17 Plaintiff Artax LLC (“Artax” or “Plaintiff”), by and through the undersigned counsel,
18 hereby asserts the following claims for patent infringement against Defendant Teletrac Navman US
19 Ltd., (“Teletrac” or “Defendant”), and alleges as follows:

20 **NATURE OF THE ACTION**

21 1. Teletrac has infringed and continues to infringe, contribute to the infringement of,
22 and/or actively induce others to infringe, U.S. Patent No. 8,019,581 (“the ‘581 Patent”), U.S. Patent
23 No. 8,390,480 (“the ‘480 Patent”), and U.S. Patent No. 8,509,412 (“the ‘412 Patent”) (collectively
24 “Patents-In-Suit”) (attached hereto as Exhibits A-C). Plaintiff accordingly files this Complaint
25 seeking a judgment of and relief for patent infringement by Teletrac.
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THE PARTIES

2. Plaintiff Artax LLC is a Texas limited liability company with its principal place of business at 17330 Preston Road, Suite 200D, Dallas, Texas 75252. Plaintiff is the owner of the intellectual property rights at issue in this action.

3. Upon information and belief, Defendant Teletrac Navman US Ltd. is a limited liability company organized under the laws of the State of Delaware with its principal place of business located at 310 Commerce, Suite 100, Irvine, CA 92602. Teletrac may be served through its registered agent for service, 1505 Corporation CSC Lawyers Incorporating Service, located at 2710 Gateway Oaks Drive, Sacramento, CA 95833.

JURISDICTION AND VENUE

4. 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.).

5. Defendant is subject to this Court’s specific and general personal jurisdiction under due process and/or the California Long Arm Statute due at least to Defendant’s substantial business in this judicial district, 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, or deriving substantial revenue from goods and services provided to individuals in California and in this district.

6. Specifically, Defendant intends to do and does business in, and has committed acts of infringement in this District directly and through intermediaries, and offered its products or services, including those accused of infringement here, to customers and potential customers located in California, including in this District. Defendant maintains regular and established places of business in this District. For example, Defendant owns, operates, manages, conducts business, and directs and controls the operations and employees of facilities at locations in this District. Defendant maintains its principal place of business in this District. Defendant has committed acts of infringement from this District, including, but not limited to, use of the Accused Products.

1 7. Defendant has also recently admitted and submitted to personal jurisdiction and
2 venue in this District.

3 **PATENTS-IN-SUIT**

4 **U.S. Patent No. 8,019,581**

5 8. On September 13, 2011, the USPTO duly and legally issued United States Patent No.
6 8,019,581 (“the ‘581 Patent”) entitled “System and Method System for Providing Routing,
7 Mapping, and Relative Position Information to Users of a Communication Network” to inventors
8 Michael A. Sheha, Stephen Petilli, and Angie Sheha. A true and correct copy of the ‘581 Patent is
9 attached as Exhibit A.

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

11 10. Artax is the owner of all rights, title, and interest in and to the ‘581 Patent, with the
12 full and exclusive right to bring suit to enforce the ‘581 Patent, including the right to recover for
13 past infringement.

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

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

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

23 Determining a local position in a navigation system has typically been done by integrating or
24 connecting Global Positioning System (GPS) technology into the local navigational system.
25 New positioning determination systems include network-assisted wireless location systems,
26 such as TOA (Time-of-Arrival), and network assisted GPS systems for determining the local
27 navigation system’s position. The unit’s location is then displayed on the device and is
28 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.

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

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

25 '581 Patent, 1:37-2:16.

26 14. The '581 Patent then states:

27 Thus, a need exist for a system that determines local and/or remote position information
28 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.

1 '581 Patent, 2:44-56.

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

U.S. Patent No. 8,390,480

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2 16. U.S. Patent No. 8,390,480 (the “480 Patent”) is titled “Method and System for
3 Saving and Retrieving Spatial Related Information” and was issued on March 5, 2013. A true and
4 correct copy of the ‘480 Patent is attached as Exhibit B.

5 17. The ‘480 Patent is valid and enforceable under United States Patent Laws.

6 18. Artax is the owner of all rights, title, and interest in and to the ‘480 Patent, with the
7 full and exclusive right to bring suit to enforce the ‘480 Patent, including the right to recover for
8 past infringement.

9 19. Artax has not granted Teletrac an approval, an authorization, or a license to the rights
10 under the ‘480 Patent.

11 20. The ‘480 Patent relates to, among other things, a method and apparatus for storing,
12 referencing, retrieving, and graphically displaying spatial and non-spatial related information of a
13 mobile computing device, such as a laptop computer or a cellular telephone.

14 21. The claimed invention(s) of the ‘480 Patent sought to solve problems with, and
15 improve upon, existing navigational systems for which the location history information monitored
16 or tracked by the system provides the user with either too much or not enough information. For
17 example, the ‘480 Patent states:

18 Prior art systems, such as AVL systems, typically involve a positioning device connected to
19 a wireless MODEM sending location information, amongst other telemetry information, at
20 discrete time intervals to a computer for the viewing of said information. This monitoring, or
21 tracking, of real-time location information or of location-history information is sometimes
22 referred to as the breadcrumb trail or history information of the mobile device, since it
23 illustrates the current and/or previous locations that the mobile device has been in space and
24 time. The problem with prior art is that the ‘breadcrumb’ trail or location history information
25 provides the user with either too much information or not enough. When too much
26 information is present, the user does not realize that such information exists until they
27 request it. Also, it is important to be able to provide a way for a user to a-priori realize that
28 the time range the user is requesting location information for has little or no data present,
which prior art systems fail to provide. The prior art systems do not provide a graphical way
to maneuver around location history information.

Typically, location history information, or Meta data, has no unique association to other
location relevant data, such as a digital photograph that has location information associated
with it. Additionally, there is no way for the prior art applications to group raw location data,

1 typically referred to as detailed location data in the art, for the purpose of providing a
2 graphical temporal view, such as a Calendar or Gantt view, for access to various types of
Meta data, including location-specific and non-location-specific Meta data.

3 ‘480 Patent, 2:5-32.

4 22. The ‘480 Patent then states:

5 Thus, a need exists for a method and system that allows the ability to store spatial and non-
6 spatial related Meta data, reference or link spatial and non-spatial related Meta data, while
7 providing a graphical display for viewing spatial and non-spatial related information in a
8 temporal or indexed format, such as a Calendar or Gantt view, and provide a method and
9 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.

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11 ‘480 Patent, 2:33-46.

12 23. The invention(s) claimed in the ‘480 Patent solves various technological problems
13 inherent in the then-existing existing navigational systems to, among other things, function more
14 efficiently.

15 **U.S. Patent No. 8,509,412**

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

20 25. The ‘412 Patent was filed on December 2, 2011 as U.S. Patent Application No.
21 13/373,841.

22 26. The ‘412 Patent is a continuation of U.S. Patent Application No. 11/968,630, now the
23 ‘608 Patent.

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

27 28. The ‘412 Patent is valid and enforceable under United States Patent Laws.

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1 29. The ‘412 Patent recognized problems with existing location and navigational
2 systems at the time of the invention of the ‘412 Patent.

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

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

14 32. The inventors of the ‘412 Patent recognized these drawbacks are overcome by “the
15 position determination, mapping, and routing system” that “assist[s] the user, or a software
16 application, in determining local and/or remote position(s) by using an online database and/or
17 networked authentication and authorization connection server.” *Id.* at 4:3-14. The inventors of the
18 ‘412 Patent further recognized that the drawbacks are overcome by providing the user’s wireless
19 device position information, which includes address information, GPS position information, and
20 nearby fixed location information. *Id.* at 3:52-57, 9:61-10:5.

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

24 **COUNT I: INFRINGEMENT OF U.S. PATENT NO. 8,019,581**

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

1 35. On information and belief, Teletrac (or those acting on its behalf) makes, uses, sells,
2 imports and/or offers to sell the Vehicle Tracking Systems that infringe (literally and/or under the
3 doctrine of equivalents) at least claim 1 of the '581 Patent. Claim 1 recites as follows:

4 [1pre] A method for presenting navigational information using a wireless communication
5 device including a GPS receiver, said method comprising:

6 [1a] receiving location information of said wireless communication device using said
7 GPS receiver of said wireless communication device, said location information
8 indicating a location of said wireless communication device;

9 [1b] receiving destination information, said destination information indicating a
10 location of a destination;

11 [1c] sending, from said wireless communication device, a request for navigational
12 information, said navigational information including route information for traveling
13 between said location of said wireless communication device and said location of
14 said destination, wherein said request for navigation information is sent to a server
15 over a telecommunication network;

16 [1d] wherein the server queries a remote party of position request for permission on
17 whether the position request can be granted based on criteria;

18 [1e] receiving, by said wireless communication device from said server over said
19 telecommunication network, said navigational information;

20 [1f] sending, from said wireless communication device to an in-vehicle navigational
21 device, said navigational information generated with said wireless communication
22 device; and

23 [1g] displaying, at a display device of said in-vehicle navigational device, driving
24 directions for traveling between said location of said wireless communication device
25 and said location of said destination based on said navigation information received
26 from said wireless communication device.

27 36. On information and belief, one or more components of Defendant's Vehicle Tracking
28 Systems employs and provides a method for presenting navigational information using a wireless
communication device including a GPS receiver.

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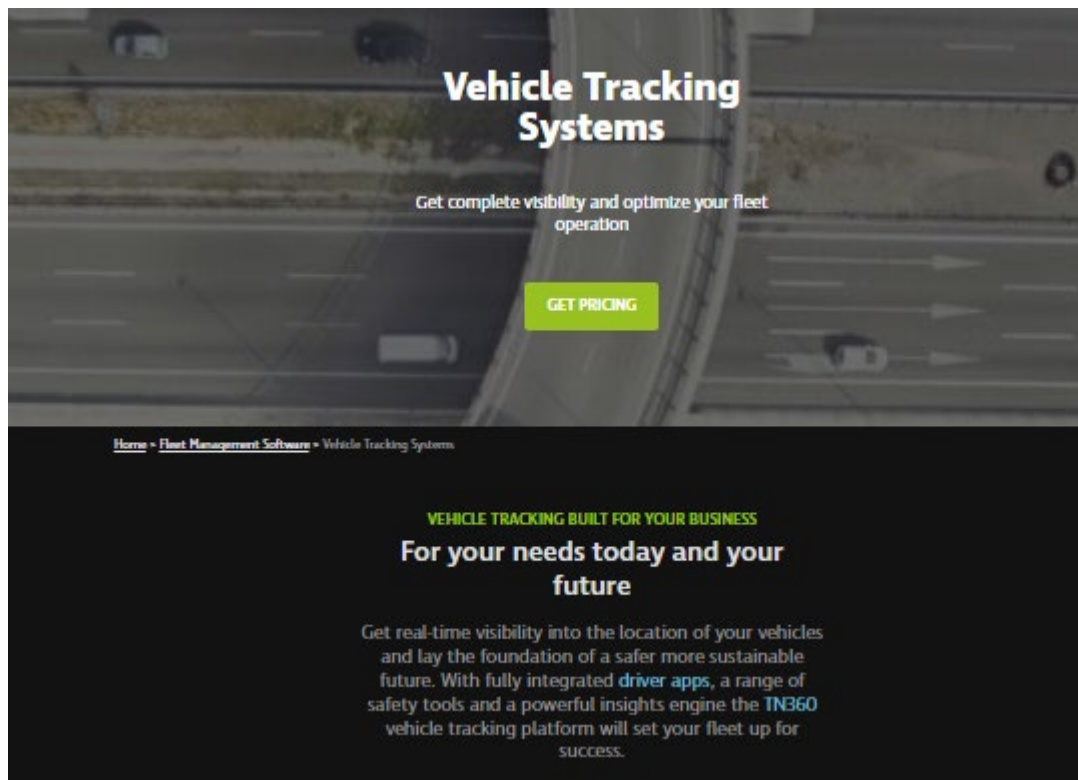


Figure 1- 1

<https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems>

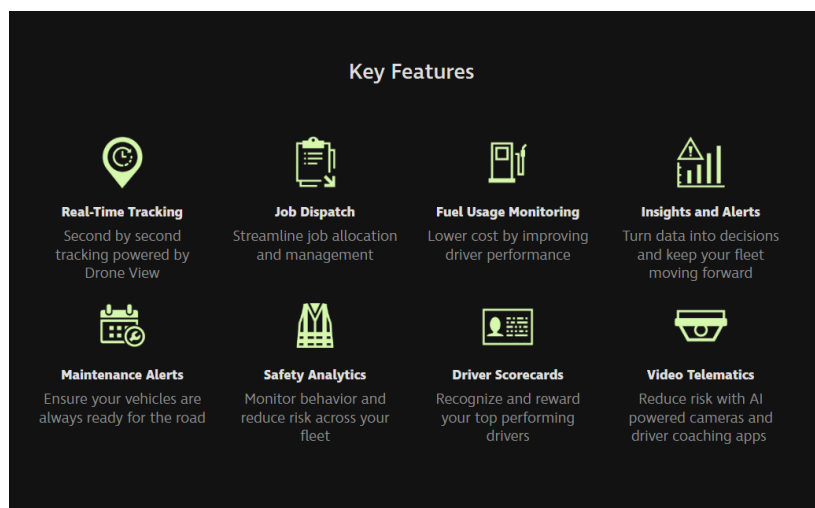


Figure 1- 2

<https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems/resources/the-ultimate-guide-to-gps-vehicle-tracking>

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How Vehicle Tracking Technology Works

Fleet tracking systems use GPS technology to provide location information. Beyond the "eye in the sky," systems rely on vehicle diagnostic sensors to relay vehicle condition. Driver monitoring systems can also be added to record driver behavior, awareness and fatigue. Together, these systems provide a complete picture of a company vehicle's status at any given time.

Systems can be broken into six key areas:

1. **GPS Satellites.** The vehicle's location is reported by a GPS receiver that gathers signals from satellites in orbit.
2. **Vehicle Monitoring.** Onboard data is recorded from driver and vehicle monitoring systems and transmitted via cellular networks.
3. **Communications.** Data transmitted from vehicles is provided using existing telecommunications infrastructure.
4. **Secure Servers.** Data is received and housed on protected servers that can be accessed by authorized users.
5. **Cloud Storage.** Accessible via the internet, businesses are able to access stored data.
6. **Software Solutions.** The end user can observe data in context to make strategic decisions for their fleet via desktop or fleet tracking app.




Figure 1- 3

<https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems/resources/the-ultimate-guide-to-gps-vehicle-tracking>

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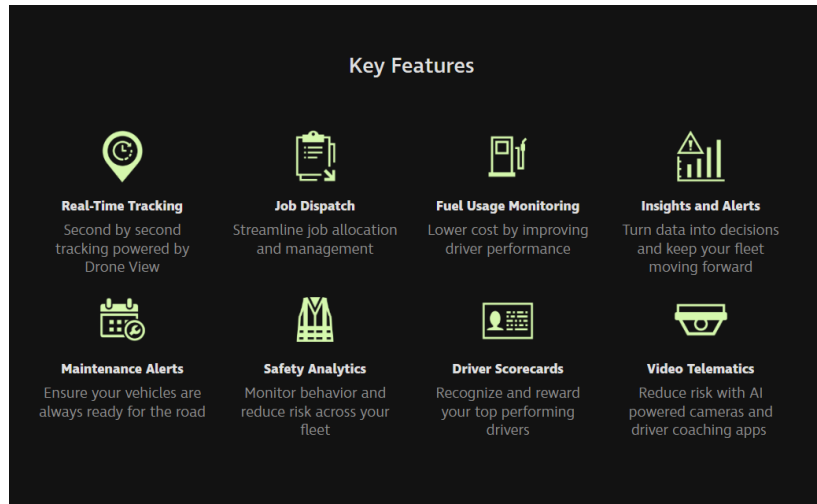


Figure 1- 4

<https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems>

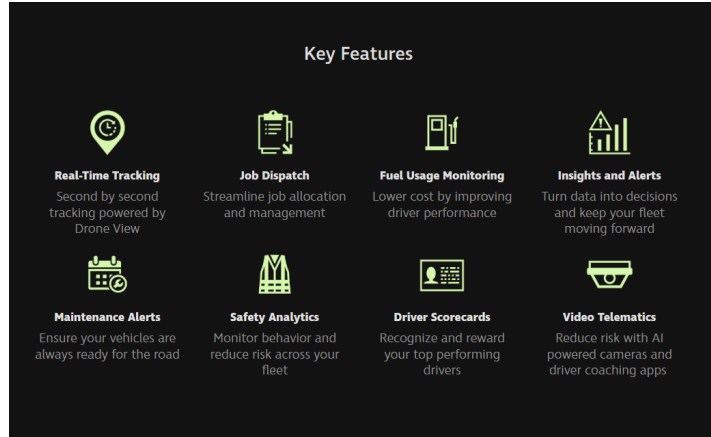


Figure 1- 5

<https://www.youtube.com/watch?v=G8ChsT8a1Lc> (Time – 0:05-0:06)

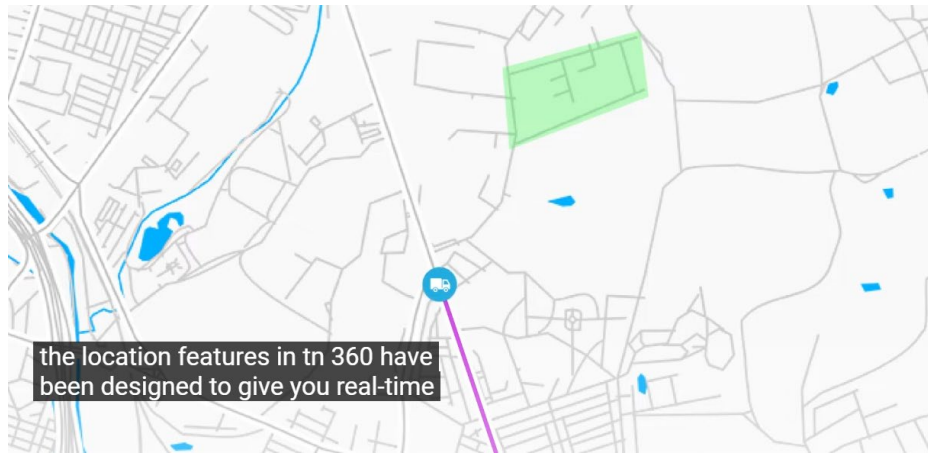
37. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems employs and provides a method for presenting navigational information using a wireless communication device including a GPS receiver comprising the step of receiving location information of said wireless communication device using said GPS receiver of said wireless

1 communication device, said location information indicating a location of said wireless
2 communication device.



11 **Figure 1- 6**

12 <https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems>



21 **Figure 1- 7**

22 <https://www.youtube.com/watch?v=G8ChsT8a1Lc> (Time – 0:05-0:06)

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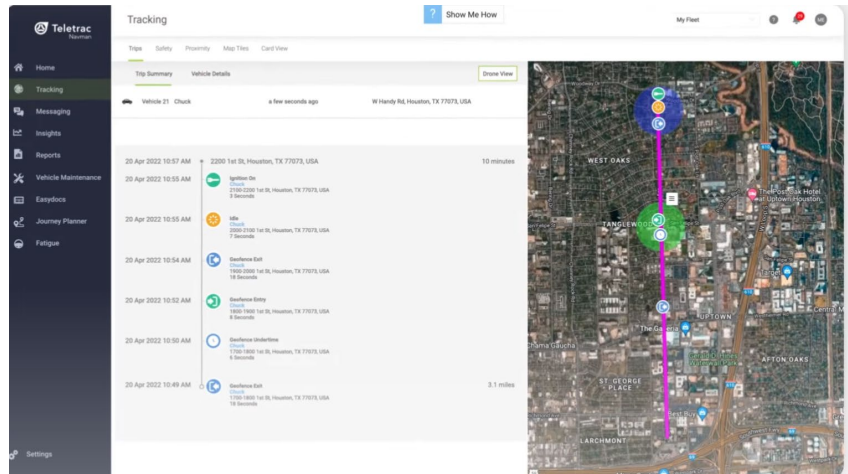


Figure 1- 8

https://www.youtube.com/watch?v=ECw_e3fTFcA&t=2s (Time – 1:20)

38. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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.

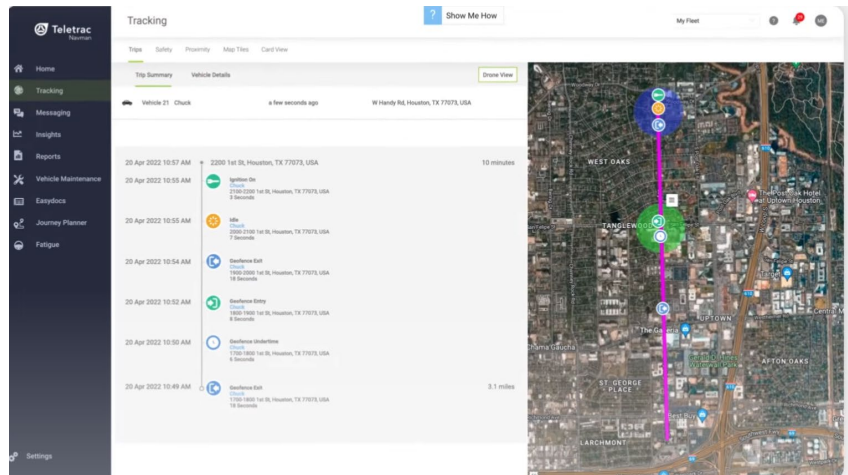


Figure 1- 9

https://www.youtube.com/watch?v=ECw_e3fTFcA&t=2s (Time – 1:20)

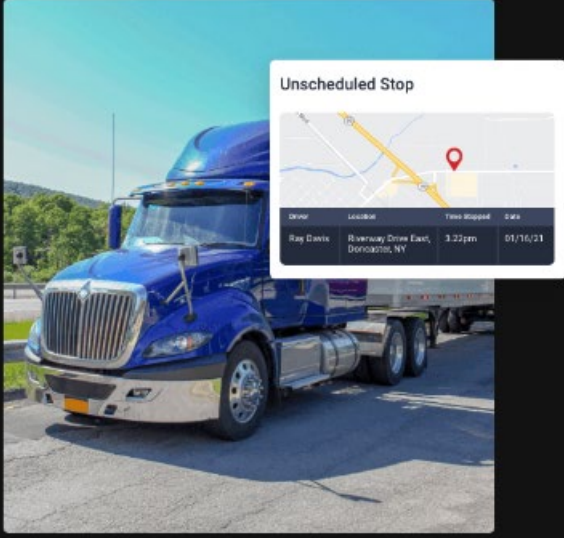
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WHAT IS JOURNEY PLANNER?

Journey Planner is an application that allows businesses to plan specific routes for their vehicles, including scheduled stops, waypoints and expected journey time. Journey planners can get instant notifications if a vehicle deviates from the set route, and run reports on actual journey time vs planned and stops during the trip.

It's an invaluable tool for businesses that:

- Are handling sensitive and valuable cargo.
- Operate in precise areas where vehicles are only permitted on certain streets or roads.
- Are transporting abnormal loads and need to ensure vehicles follow a specific route.



| Driver | Location | Time Stopped | Date |
|-----------|--|--------------|----------|
| Ray Davis | Riverway Drive East, Dorchester, NY | 3:22pm | 01/16/21 |

Figure 1- 10

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

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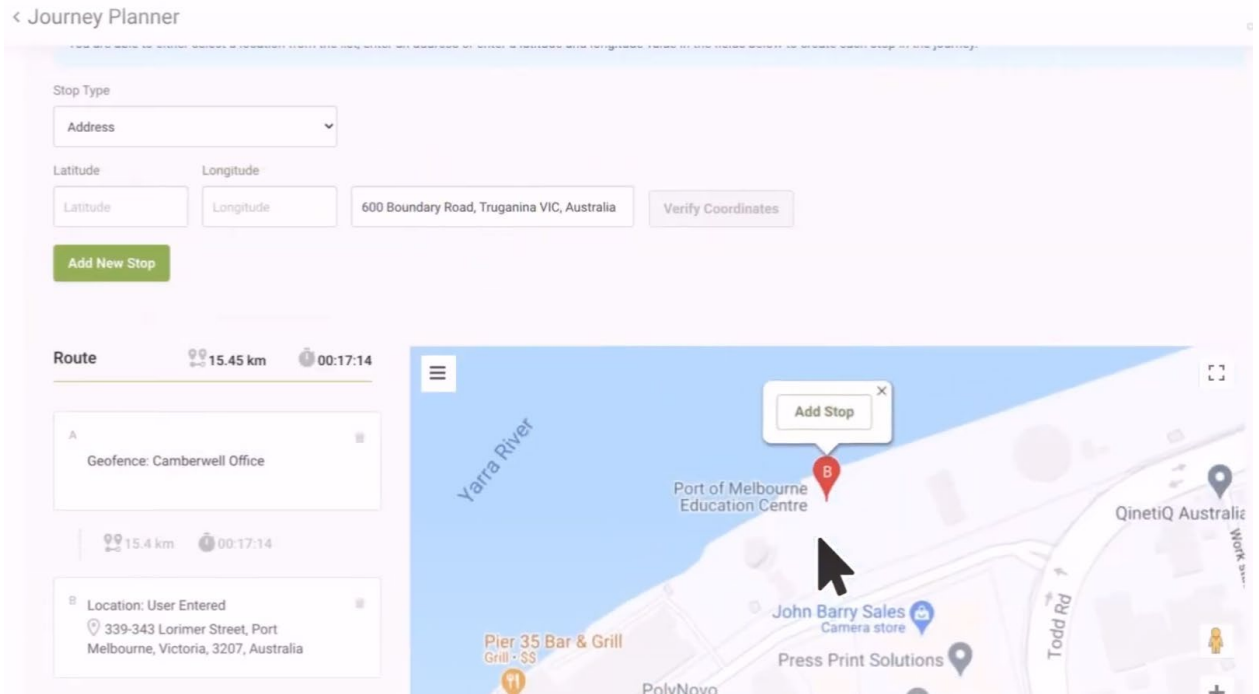


Figure 1- 11

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

39. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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.

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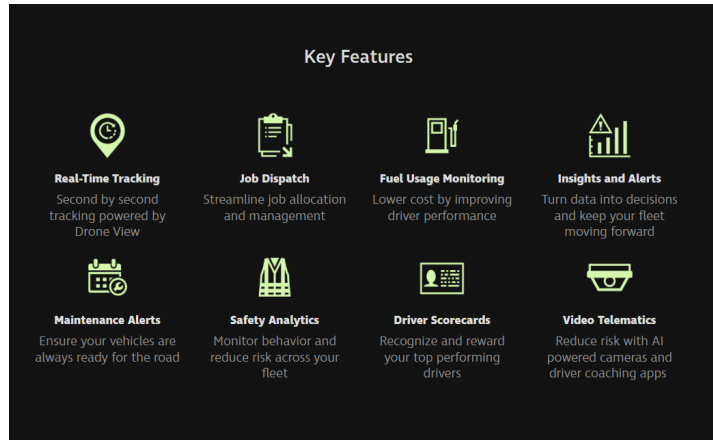


Figure 1- 12

<https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems>

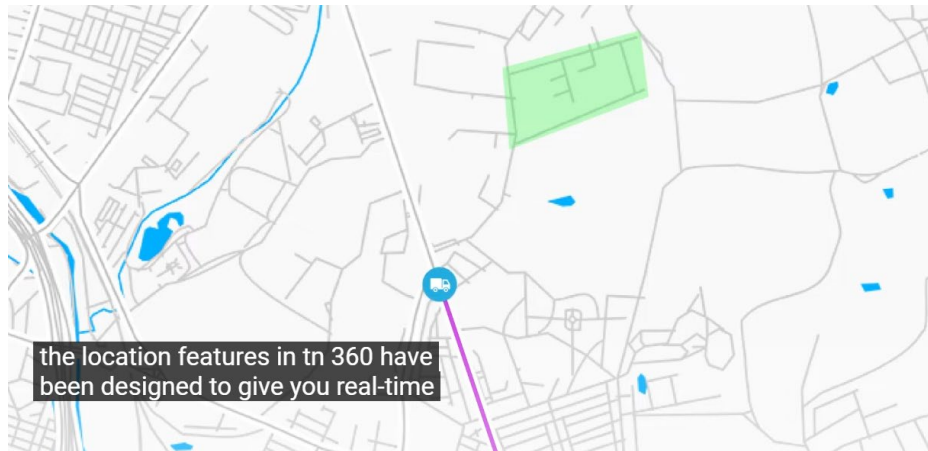


Figure 1- 13

<https://www.youtube.com/watch?v=G8ChsT8a1Lc> (Time – 0:05-0:06)

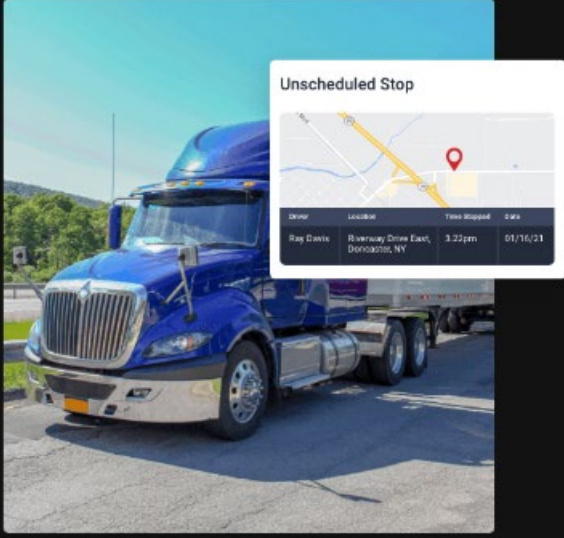
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- Operate in precise areas where vehicles are only permitted on certain streets or roads.
- Are transporting abnormal loads and need to ensure vehicles follow a specific route.



| Driver | Location | Time Stopped | Date |
|-----------|--|--------------|----------|
| Ray Davis | Riverway Drive East, Dorchester, NY | 3:22pm | 01/16/21 |

Figure 1- 14

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

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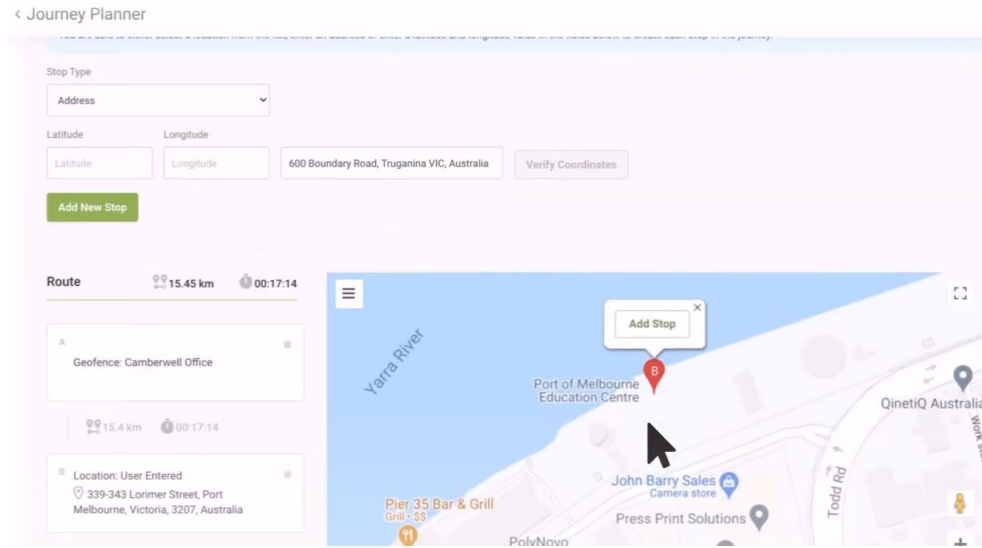


Figure 1- 15

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

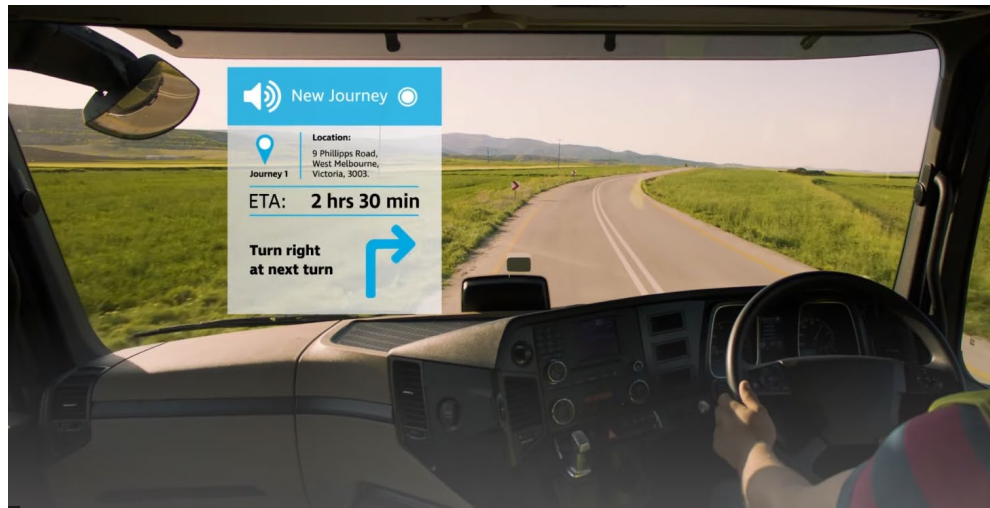


Figure 1- 16

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

40. On information and belief, one or more components of Defendant's Vehicle Tracking Systems employs and provides a presenting of 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.

| NAME | COMPANY | FLEET | LOCATION | AREA MP | ACTIONS |
|--------------|------------|--|----------|---------|---------|
| Headquarters | My Company | No Fleet North Fleet East Fleet West Fleet South Fleet | | 0.250 | ... |
| South Depot | My Company | No Fleet South Fleet | | 0.010 | ... |
| West Depot | My Company | No Fleet West Fleet | | 0.010 | ... |

Figure 1- 17

<https://www.youtube.com/watch?v=G8ChsT8a1Lc> (Time – 0:49-0:51)

41. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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.

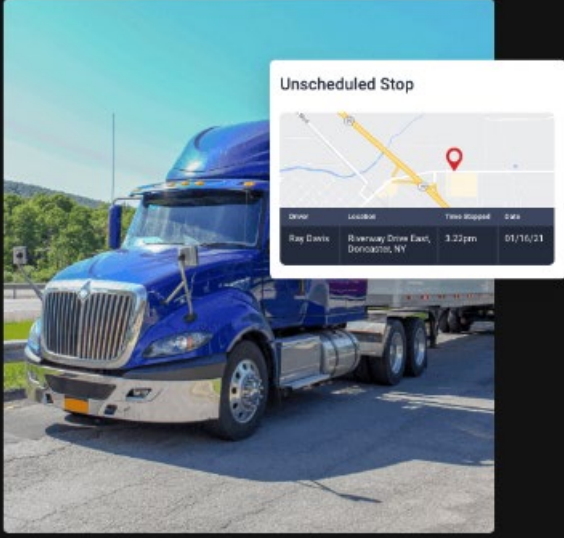
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WHAT IS JOURNEY PLANNER?

Journey Planner is an application that allows businesses to plan specific routes for their vehicles, including scheduled stops, waypoints and expected journey time. Journey planners can get instant notifications if a vehicle deviates from the set route, and run reports on actual journey time vs planned and stops during the trip.

It's an invaluable tool for businesses that:

- Are handling sensitive and valuable cargo.
- Operate in precise areas where vehicles are only permitted on certain streets or roads.
- Are transporting abnormal loads and need to ensure vehicles follow a specific route.



| Driver | Location | Time Stopped | Date |
|-----------|--|--------------|----------|
| Ray Davis | Riverway Drive East, Dorchester, NY | 3:22pm | 01/16/21 |

Figure 1- 18

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

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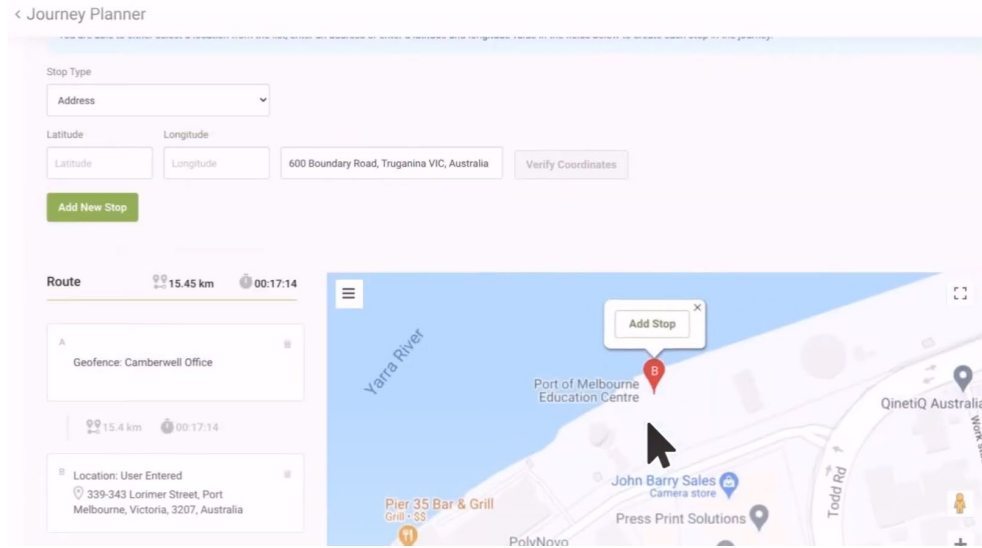


Figure 1- 19

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

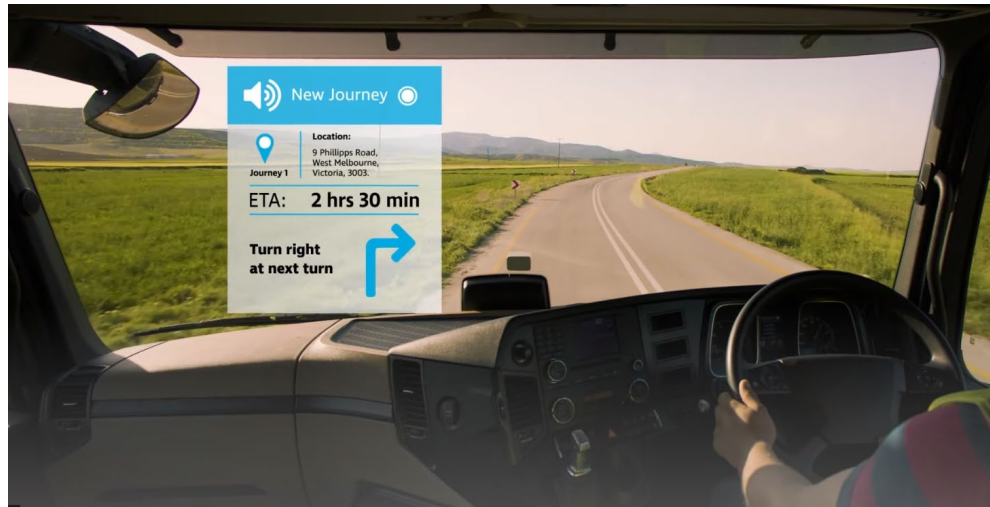


Figure 1- 20

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

42. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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.

VT101

Powering Your TN360 Software

Specially developed for use with the TN360 platform, the VT101 is a hardwired device that captures and sends key information such as vehicle location, trip miles, vehicle engine data, and driver safety data to the TN360 platform where you can monitor vehicle activity, manage workflow, receive exception alerts and answer business questions through the Insights tool and customized reporting.



Figure 1- 21

<https://www.teletracnavman.com/product-resources/vt101>

Integrated Apps

The data captured via the VT101 also powers the TN360 Mobile application that keeps you connected with your fleet throughout the day. Your driver and vehicle data can also be used alongside a wide range of TN360 mobile apps including:

- Messaging enables canned and custom messaging with drivers
- Forms allow the creation of custom workflows
- Pre-Trip Checklist digitizes pre and post-trip vehicle inspections and can be used as part of your workflow for any task list
- Amazon Alexa and IFTTT (if this then that) integrations bring automation to you.



Figure 1- 22

<https://www.teletracnavman.com/product-resources/vt101>

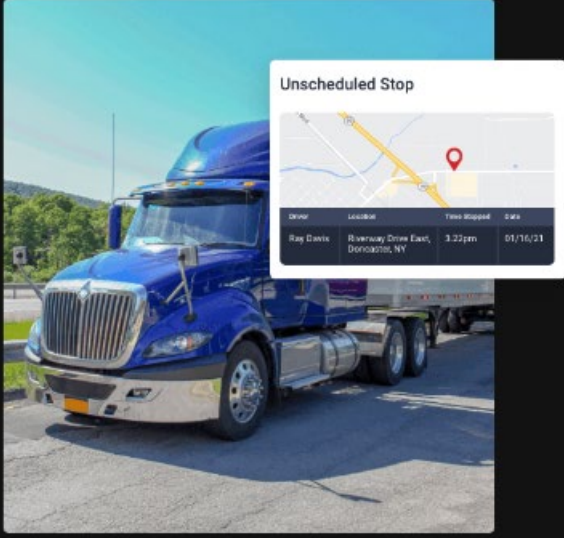
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It's an invaluable tool for businesses that:

- Are handling sensitive and valuable cargo.
- Operate in precise areas where vehicles are only permitted on certain streets or roads.
- Are transporting abnormal loads and need to ensure vehicles follow a specific route.



| Driver | Location | Time Stopped | Date |
|-----------|-------------------------------------|--------------|----------|
| Ray Davis | Riverway Drive East, Dorchester, NY | 3:22pm | 01/16/21 |

Figure 1- 23

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

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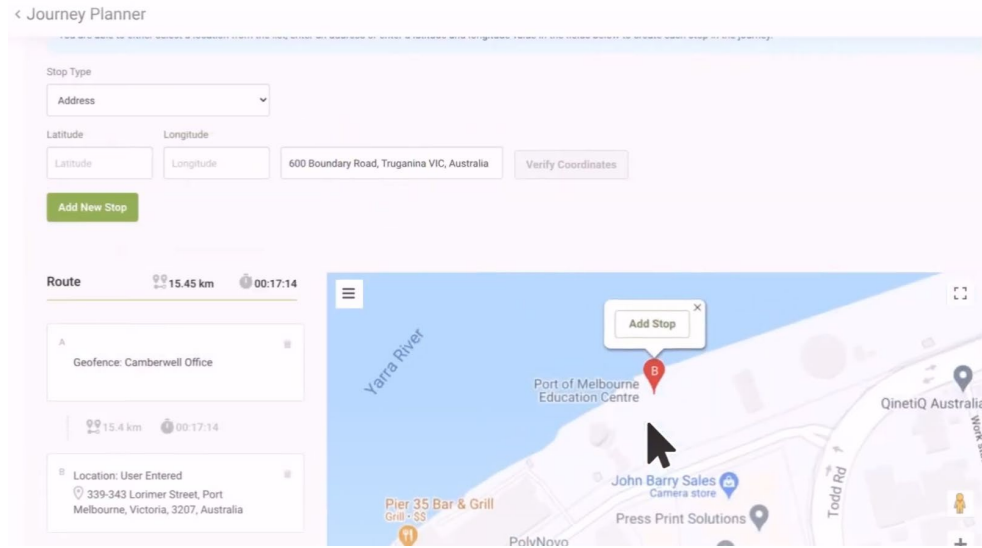


Figure 1- 24

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

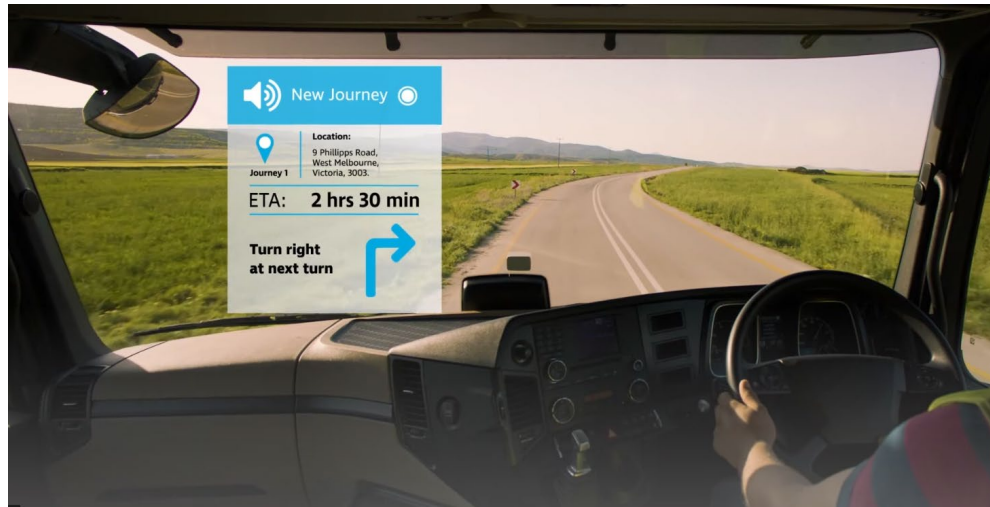


Figure 1- 25

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

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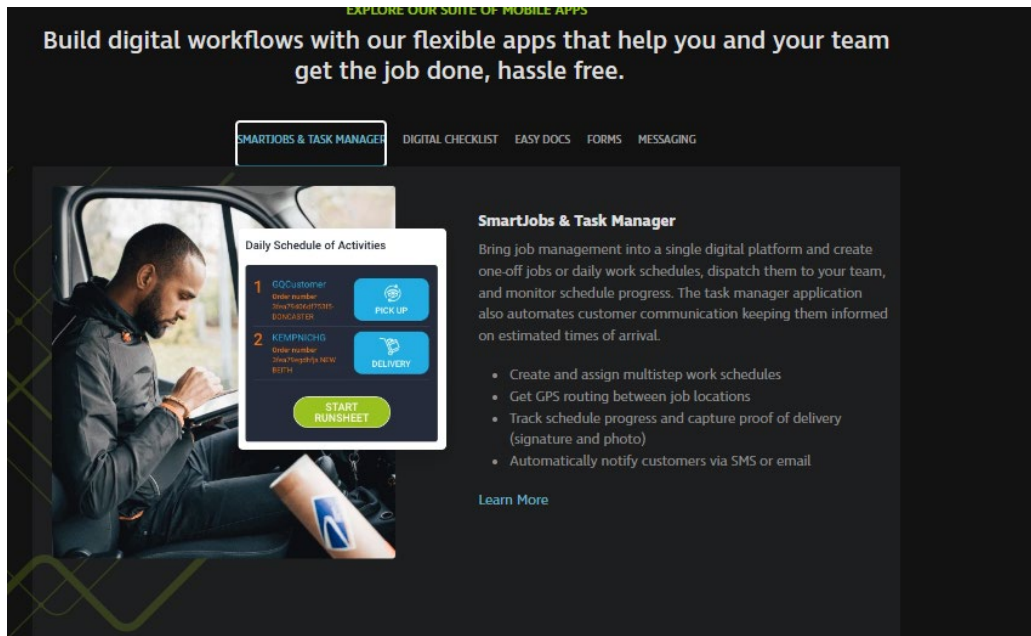


Figure 1- 26

<https://www.teletracnavman.com/product-resources/tn360-mobile-apps>

43. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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.

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WHAT IS JOURNEY PLANNER?

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- Operate in precise areas where vehicles are only permitted on certain streets or roads.
- Are transporting abnormal loads and need to ensure vehicles follow a specific route.

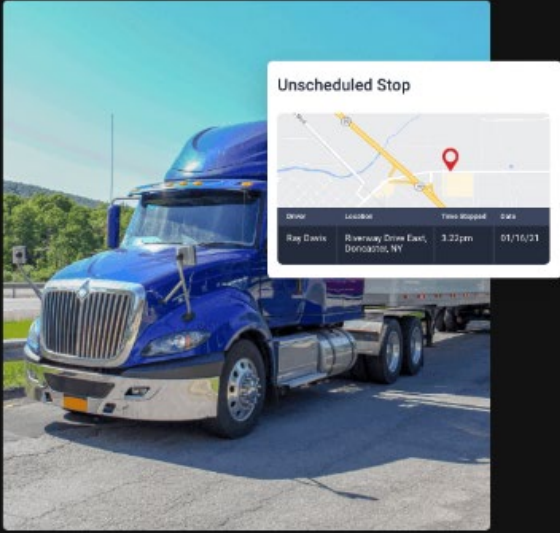


Figure 1- 27

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

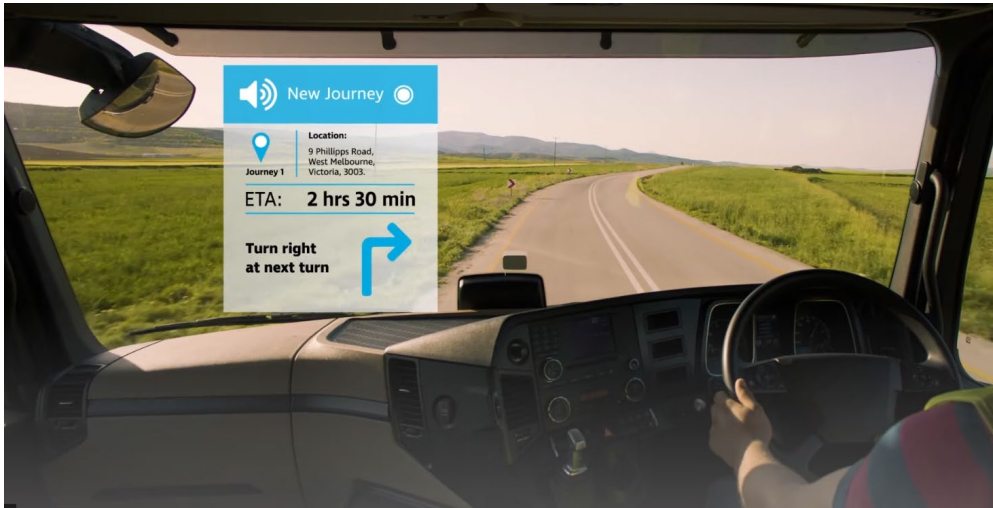


Figure 1- 28

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

1 This is only possible by having a fully integrated route planning and
2 navigation platform where route information can seamlessly flow between
3 the planning software and the in-vehicle navigation device.

4 **HOW CAN JOURNEY PLANNER AND SMARTNAV: ROUTE HELP YOUR FLEET?**

5 In minutes you can create specific routes and dispatch drivers with turn-by-
6 turn navigation that will guide them to their destination on the pre-set
7 route. This is particularly important when you are carrying sensitive or
8 valuable cargo. It is also a terrific value-added service that customers can
9 promote when bidding for contracts, allowing them to demonstrate that
10 they have embraced the latest technology to ensure safe transit of cargo.

- 11 • **Increase Productivity & Efficiency.** Send customized route directly to
12 your driver, with turn-by-turn voice-guided navigation to help your
13 fleet stay on track.
- 14 • **Improve Safety.** Real-time alerts for when any truck on your fleet
15 deviates from its pre-set route. The platform will then redirect the
16 driver back onto the planned route, not directly to the destination.
- 17 • **Be In-the-know.** Get alerts when there are route deviations,
18 unscheduled stops and excessive travel times.
- 19 • **Maintain Compliance.** Plan routes that meet permitting and
20 restrictions to help meet compliance standards.
- 21 • **Stay Up to Date.** Map updates that are automatically installed as they
22 are made available.

23 **Figure 1- 29**

24 <https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

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

45. On information and belief, Teletrac 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 Vehicle Tracking Systems.

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

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COUNT II: INFRINGEMENT OF U.S. PATENT NO. 8,390,480

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, Teletrac (or those acting on its behalf) makes, uses, sells, imports and/or offers to sell Vehicle Tracking Systems that infringes (literally and/or under the doctrine of equivalents) at least claim 1 of the '480 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 monitoring a plurality of users, each in possession of a mobile communication device adapted to communicate with the system and provide its own position information, the method comprising the steps of:

[1a] periodically receiving position information of each of the mobile communication devices;

[1b] associating each periodically received position information with a timely data indicating a time at which each position information was received; and

[1c] determining, for each user, in response to the position information and the associated time information, a number of stops made by the user, a duration of each of the stops, a duration of travel time between every two consecutive stops.

49. On information and belief, one or more components of Defendant's Vehicle Tracking Systems 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 monitoring a plurality of users, each in possession of a mobile communication device adapted to communicate with the system and provide its own position information.

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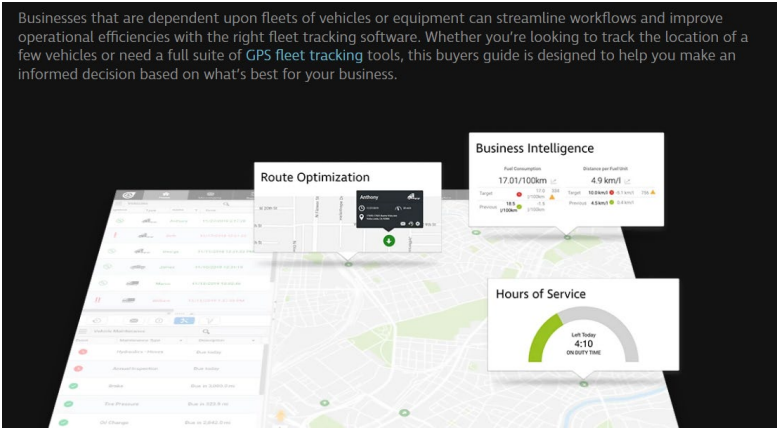


Figure 2- 1

<https://www.teletracnavman.com/fleet-management-software/fleet-tracking>

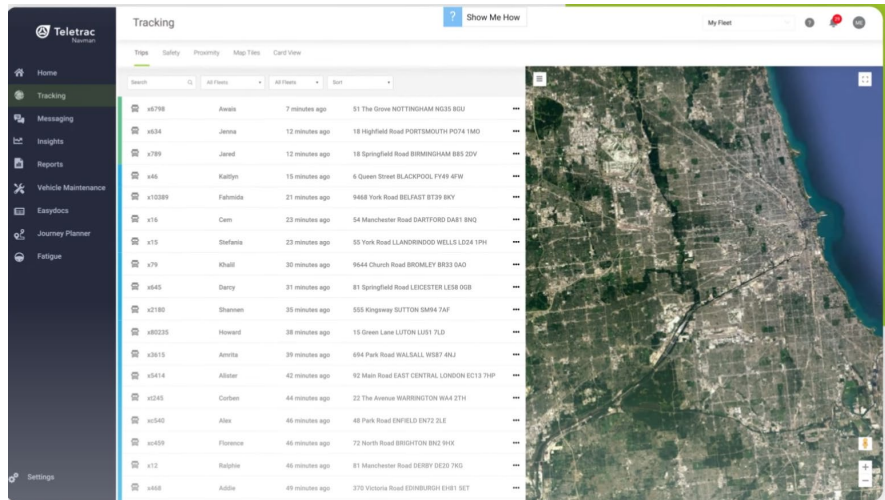


Figure 2- 2

https://www.youtube.com/watch?v=ECw_e3fTFcA&t=2s (Time – 0:57-0:58)

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How Vehicle Tracking Technology Works

Fleet tracking systems use GPS technology to provide location information. Beyond the "eye in the sky," systems rely on vehicle diagnostic sensors to relay vehicle condition. Driver monitoring systems can also be added to record driver behavior, awareness and fatigue. Together, these systems provide a complete picture of a company vehicle's status at any given time.

Systems can be broken into six key areas:

1. **GPS Satellites.** The vehicle's location is reported by a GPS receiver that gathers signals from satellites in orbit.
2. **Vehicle Monitoring.** Onboard data is recorded from driver and vehicle monitoring systems and transmitted via cellular networks.
3. **Communications.** Data transmitted from vehicles is provided using existing telecommunications infrastructure.
4. **Secure Servers.** Data is received and housed on protected servers that can be accessed by authorized users.
5. **Cloud Storage.** Accessible via the internet, businesses are able to access stored data.
6. **Software Solutions.** The end user can observe data in context to make strategic decisions for their fleet via desktop or fleet tracking app.

Figure 2- 3

<https://www.teletnacnavman.com/fleet-management-software/vehicle-tracking-systems/resources/the-ultimate-guide-to-gps-vehicle-tracking>

— How are fleet tracking devices installed?

GPS fleet tracking devices are installed under the dashboard and are hardwired into the vehicle's onboard computer, usually connecting via the vehicle's OBDII port. This is typically done by a professional installer and once complete the device is virtually invisible. A mobile tablet or other display unit can also be mounted in the cab which interacts with the GPS device enabling information to be shared between drivers and the back office.

Figure 2- 4

<https://www.teletnacnavman.com/fleet-management-software/fleet-tracking#2>

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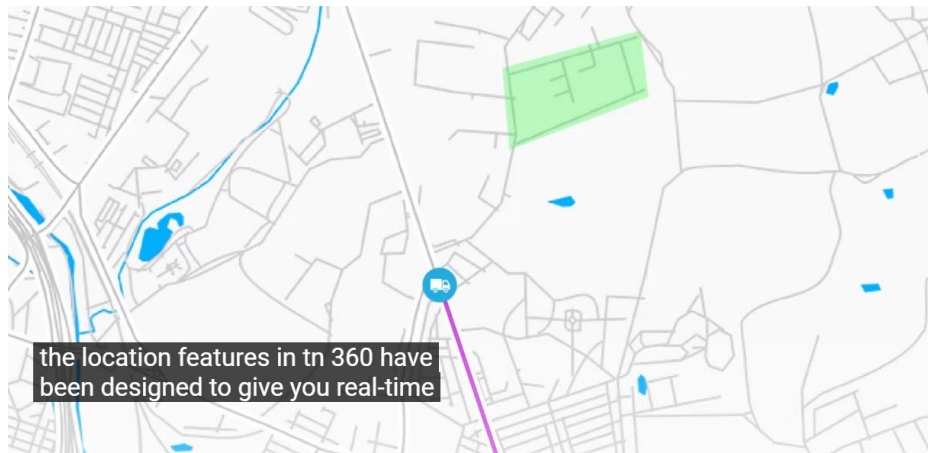


Figure 2- 5

<https://www.youtube.com/watch?v=G8ChsT8a1Lc> (Time – 0:05-0:06)

50. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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 monitoring a plurality of users, each in possession of a mobile communication device adapted to communicate with the system and provide its own position information, the method comprising the steps of periodically receiving position information of each of the mobile communication devices.

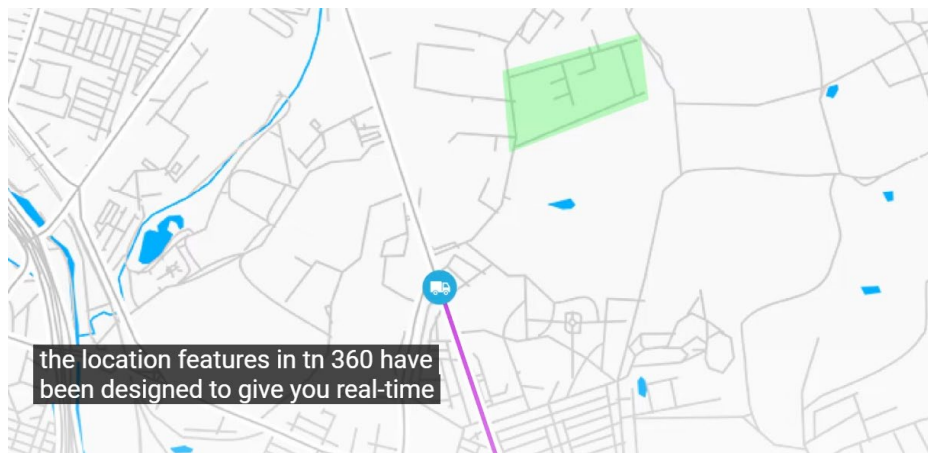


Figure 2- 6

<https://www.youtube.com/watch?v=G8ChsT8a1Lc> (Time – 0:05-0:06)

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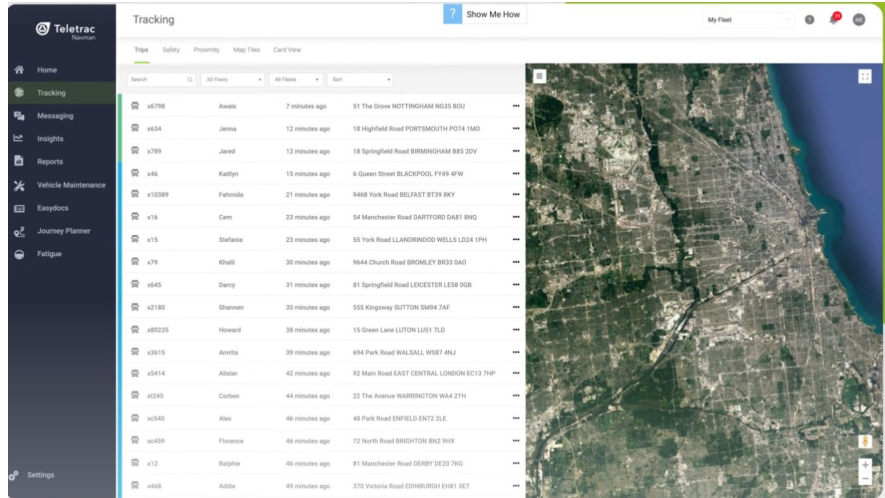


Figure 2- 7

https://www.youtube.com/watch?v=ECw_e3fTFcA&t=2s (Time – 0:57-0:58)

51. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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 monitoring a plurality of users, each in possession of a mobile communication device adapted to communicate with the system and provide its own position information, the method comprising the steps of associating each periodically received position information with a timely data indicating a time at which each position information was received.

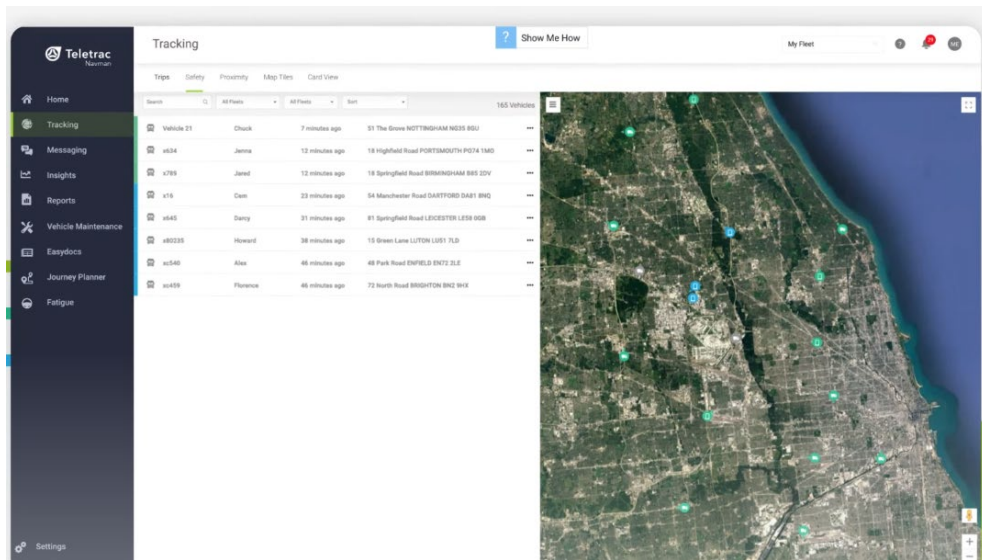


Figure 2- 8

https://www.youtube.com/watch?v=ECw_e3fTFcA&t=2s (Time – 1:39-1:40)

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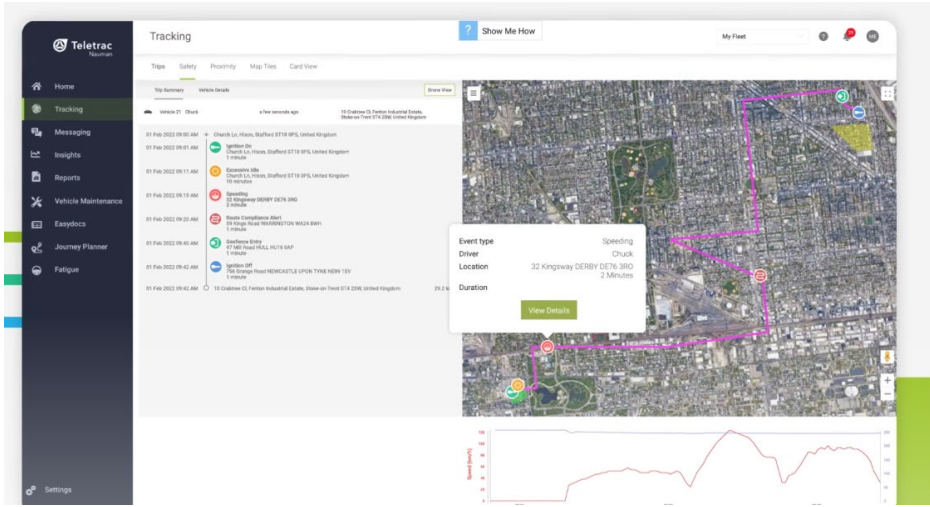


Figure 2- 9

https://www.youtube.com/watch?v=ECw_e3fTFcA&t=2s (Time – 0:57-0:58, 1:42-1:45)

52. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems employees and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of monitoring a plurality of users, each in possession of a mobile communication device adapted to communicate with the system and provide its own position information, the method comprising the steps of determining, for each user, in response to the position information and the associated time information, a number of stops made by the user, a duration of each of the stops, a duration of travel time between every two consecutive stops.

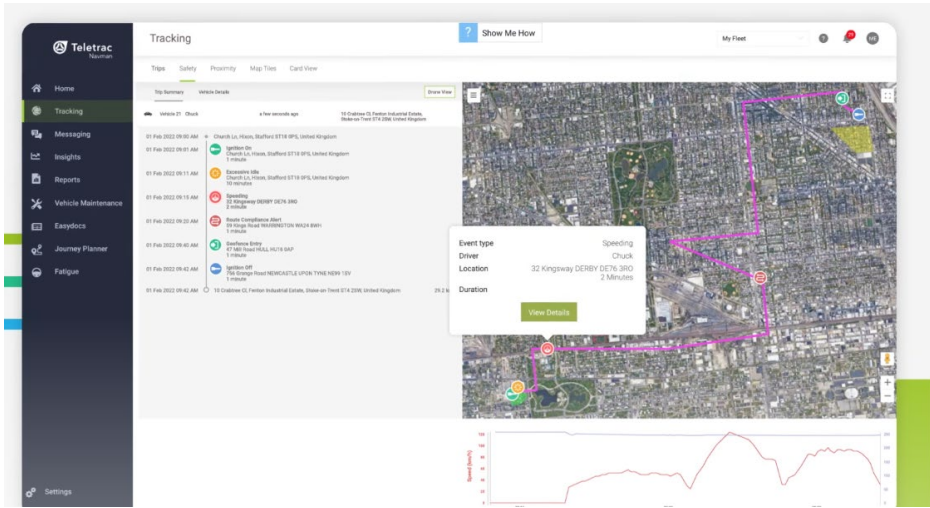


Figure 2- 10

https://www.youtube.com/watch?v=ECw_e3fTFcA&t=2s (Time – 1:42-1:45)

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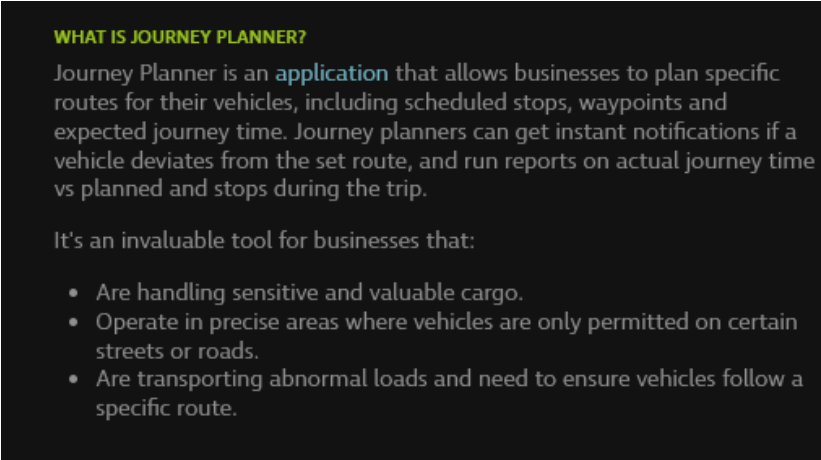


Figure 2- 11

<https://www.teletracnavman.com/product-resources/tn360-journey-planner-smartnavroute>

53. As a result of Teletrac’s infringement, Artax 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.

54. On information and belief, Teletrac 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 Vehicle Tracking Systems.

55. Teletrac’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 U.S. PATENT NO. 8,509,412

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

57. On information and belief, Teletrac (or those acting on its behalf) makes, uses, sells, imports and/or offers to sell the Vehicle Tracking Systems 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

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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.

58. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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.

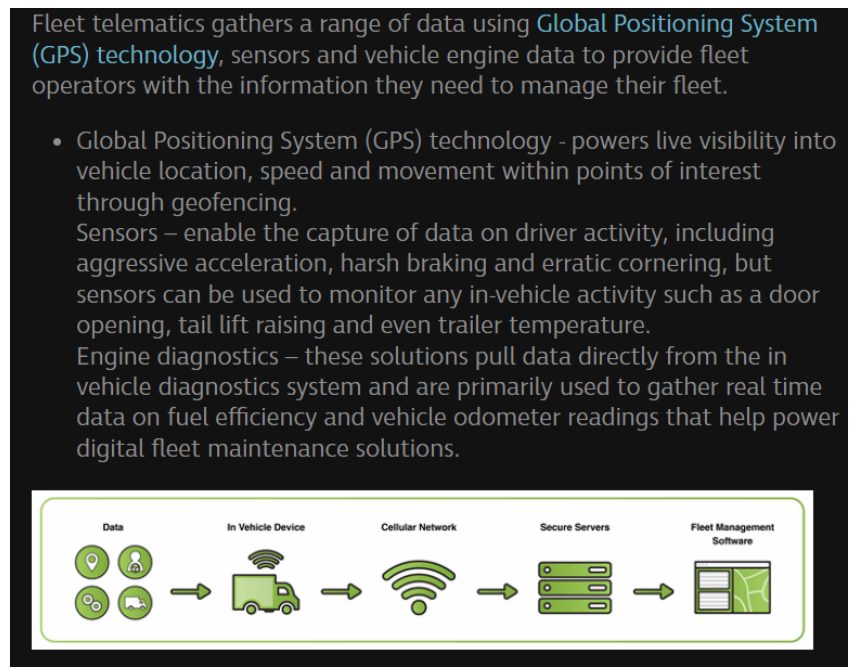


Figure 3- 1

<https://www.teletracnavman.com/fleet-management-software/telematics/resources/what-is-telematics>

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Figure 3- 2

<https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems/resources/the-ultimate-guide-to-gps-vehicle-tracking>

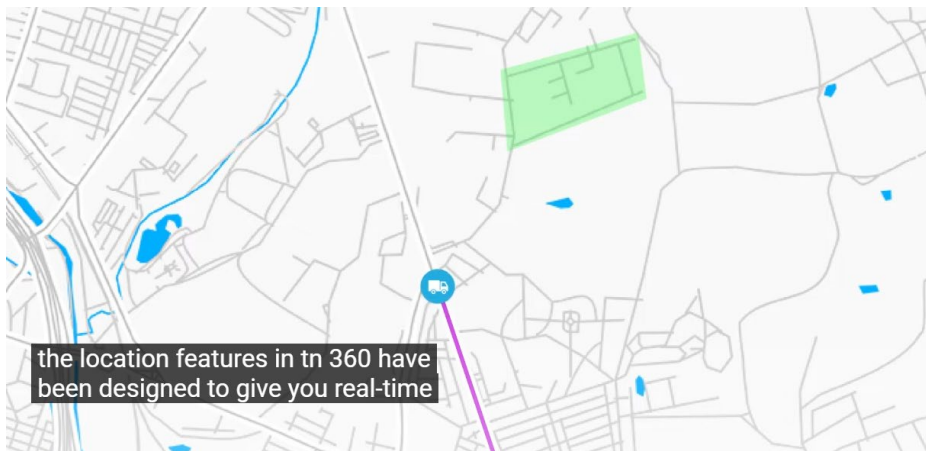
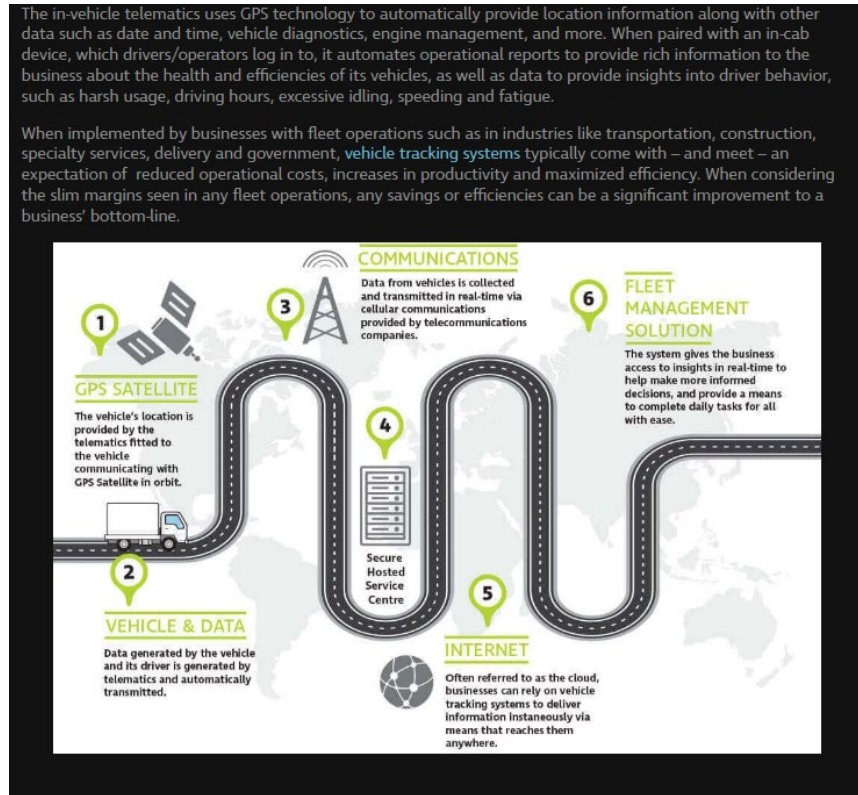


Figure 3- 3

<https://www.youtube.com/watch?v=G8ChsT8a1Lc> (Time – 0:05-0:06)

1 59. On information and belief, one or more components of Defendant’s Vehicle Tracking
 2 Systems employs and provides a method of providing position information of a first wireless user
 3 device to a second wireless user device of a communication network comprising the step of
 4 receiving first wireless user device information including first phone number information associated
 5 with a first wireless user device.



20 **Figure 3- 4**

21 <https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems/resources/how-does-a-vehicle-tracking-system-work>

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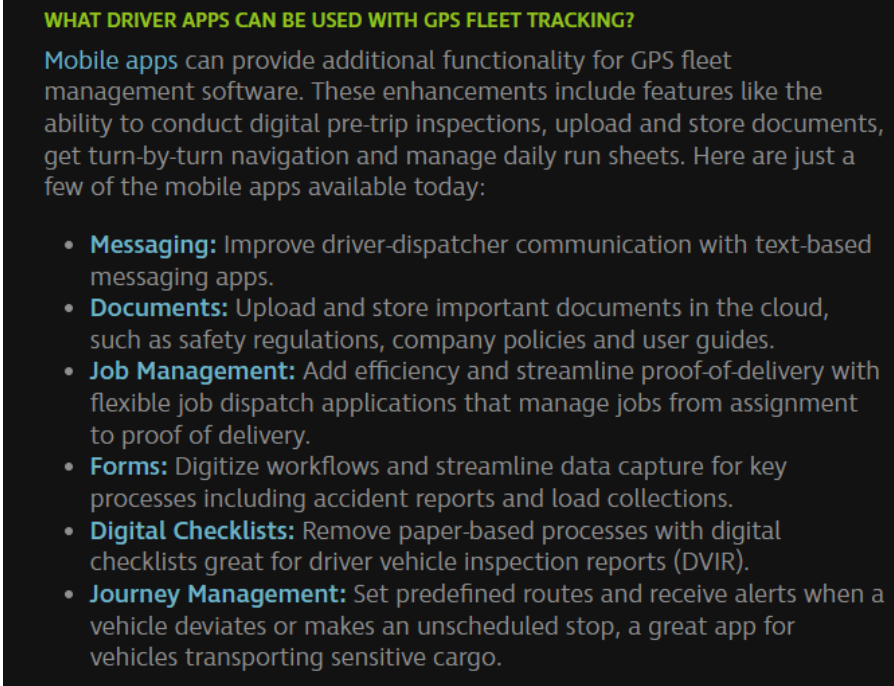


Figure 3- 5

<https://www.teletracnavman.com/fleet-management-software/fleet-tracking/resources/what-is-gps-fleet-tracking>

60. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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.

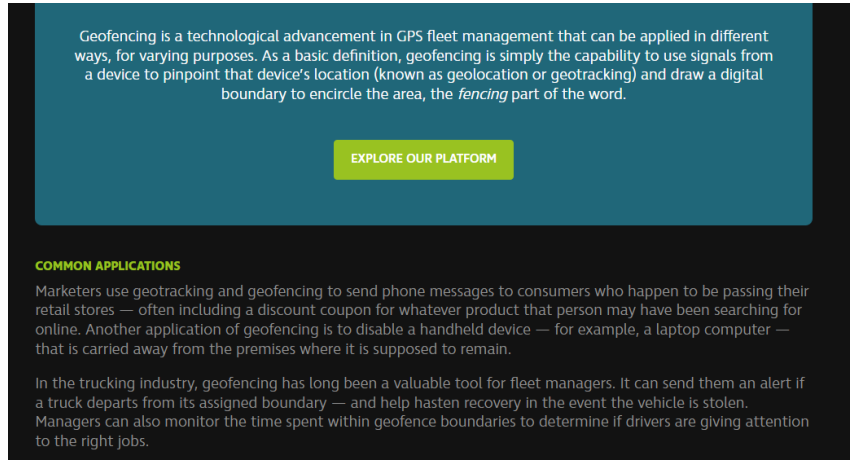


Figure 3- 6

<https://www.teletracnavman.com/fleet-management-software/resources/what-is-geofencing>

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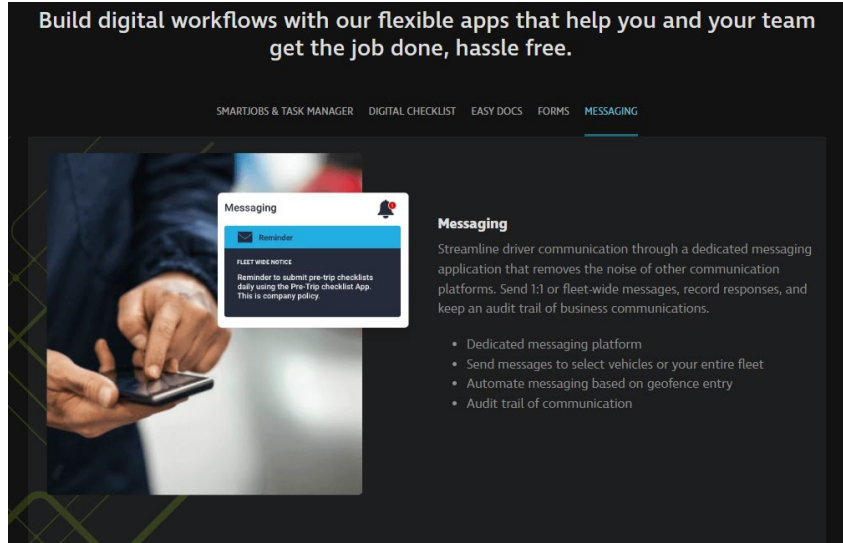


Figure 3- 7

<https://www.teletracnavman.com/product-resources/tn360-mobile-apps>

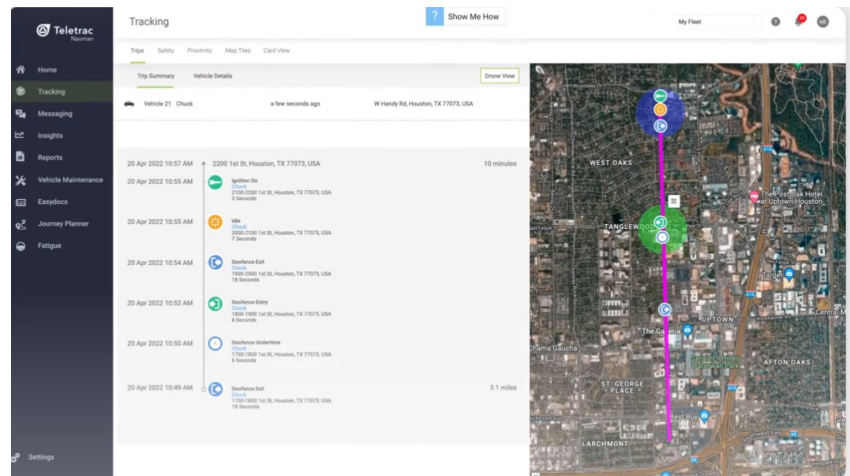


Figure 3- 8

https://www.youtube.com/watch?v=ECw_e3fTFcA&t=2s (Time – 1:20)

61. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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.

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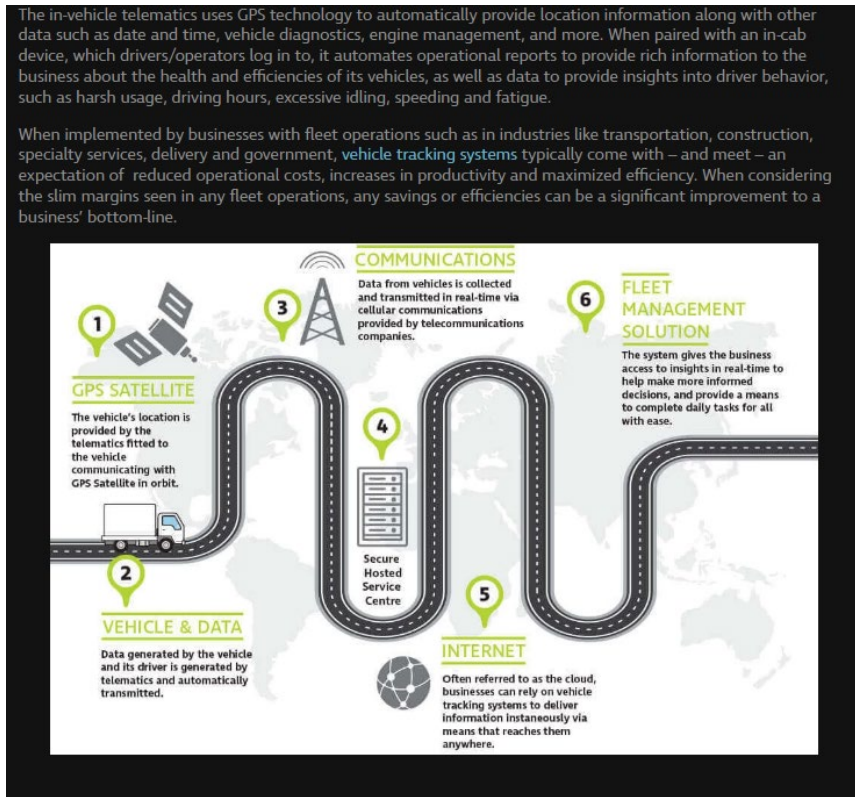


Figure 3- 9

<https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems/resources/how-does-a-vehicle-tracking-system-work>

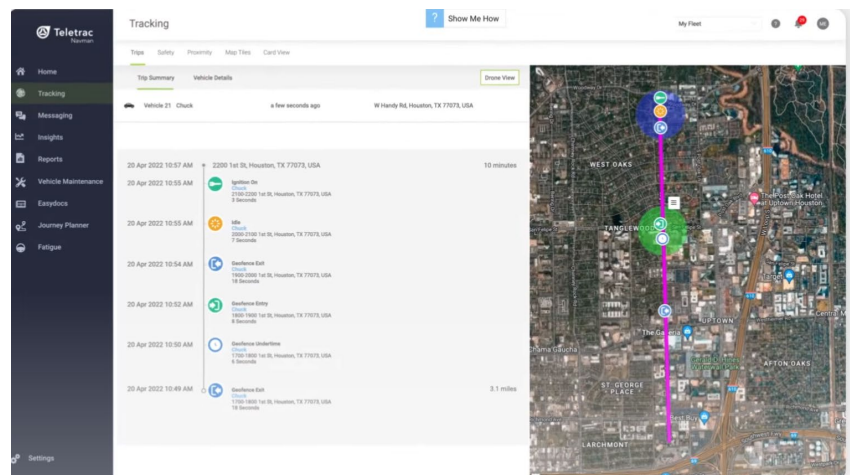


Figure 3- 10

https://www.youtube.com/watch?v=ECw_e3tFfcA&t=2s (Time – 1:20)

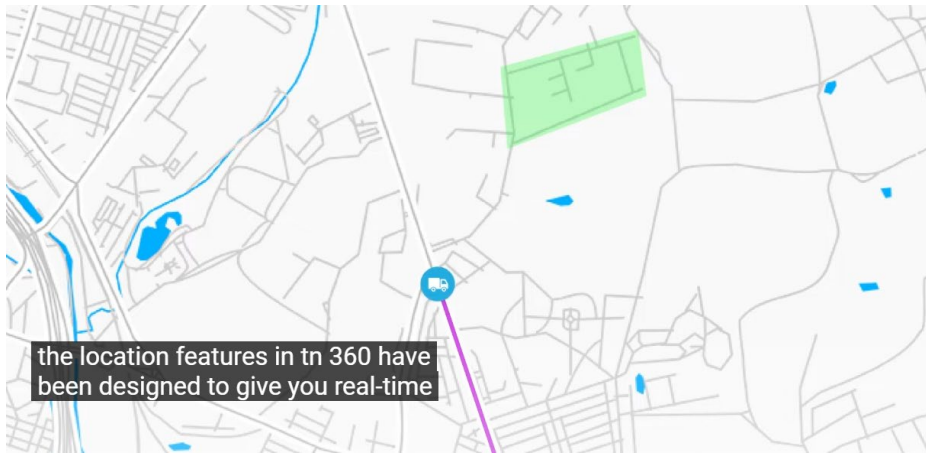


Figure 3- 11

<https://www.youtube.com/watch?v=G8ChsT8a1Lc> (Time – 0:05-0:06)

62. On information and belief, one or more components of Defendant’s Vehicle Tracking Systems 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.

WHAT DRIVER APPS CAN BE USED WITH GPS FLEET TRACKING?

Mobile apps can provide additional functionality for GPS fleet management software. These enhancements include features like the ability to conduct digital pre-trip inspections, upload and store documents, get turn-by-turn navigation and manage daily run sheets. Here are just a few of the mobile apps available today:

- **Messaging:** Improve driver-dispatcher communication with text-based messaging apps.
- **Documents:** Upload and store important documents in the cloud, such as safety regulations, company policies and user guides.
- **Job Management:** Add efficiency and streamline proof-of-delivery with flexible job dispatch applications that manage jobs from assignment to proof of delivery.
- **Forms:** Digitize workflows and streamline data capture for key processes including accident reports and load collections.
- **Digital Checklists:** Remove paper-based processes with digital checklists great for driver vehicle inspection reports (DVIR).
- **Journey Management:** Set predefined routes and receive alerts when a vehicle deviates or makes an unscheduled stop, a great app for vehicles transporting sensitive cargo.

Figure 3- 12

<https://www.teletracnavman.com/fleet-management-software/fleet-tracking/resources/what-is-gps-fleet-tracking>

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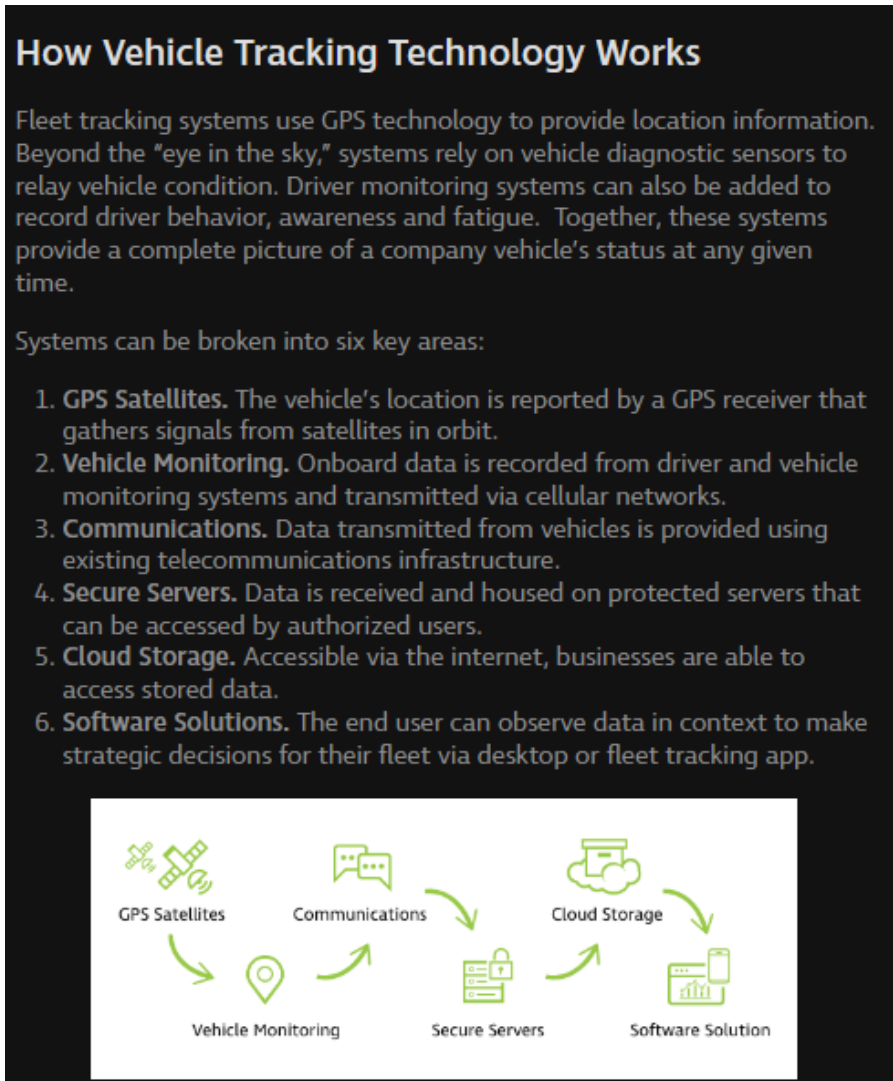


Figure 3- 13

<https://www.teletracnavman.com/fleet-management-software/vehicle-tracking-systems/resources/the-ultimate-guide-to-gps-vehicle-tracking>

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

64. As a result of Teletrac's infringement, Artax 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.

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DATED: August 30, 2024

Respectfully Submitted,

By: /s/ Andrew S. Dallmann

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