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

Artax LLC, Plaintiff, v. MiX Telematics North America, Inc., Defendants.	Civil Action No. **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Artax, LLC ("Artax" or "Plaintiff"), by and through the undersigned counsel, hereby assets the following claims for patent infringement against Defendant MiX Telematics North America, Inc. ("MiX"), and alleges as follows:

NATURE OF THE ACTION

1. MiX has infringed and continues to infringe, contribute to the infringement of, and/or actively induce others to infringe, U.S. Patent No. 8,019,581 ("the '581 Patent"), U.S. Patent No. 8,169,343 ("the '343 Patent"), and U.S. Patent No. 8,509,412 ("the '412 Patent") (collectively "Patents-In-Suit") (attached hereto as Exhibits A-C). Plaintiff accordingly files this Complaint seeking a judgment of and relief for patent infringement by MiX.

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. Defendant MiX Telematics North America, Inc. is a Texas corporation. Upon information and belief, Defendant MiX Telematics North America, Inc. conducts business as MiX by Powerfleet by and through a regular and established place of business in Frisco, TX.

4. Defendant MiX Telematics North America, Inc. can be served through its agent for service of process, Samuel R. Bonney, 3838 Oak Lawn, Suite 800, Dallas, TX 75219.

THE ACCUSED PRODUCTS

5. On information and belief, MiX produces and sells fleet management solutions delivered via software-as-a-service, including the MiX Fleet Manager platform, which utilizes hardware systems such as GPS Tracking Devices, Electronic Logging Devices, on-board mobile devices, and/or other accessories in combination with various software applications/features including, but not limited to, Journey Management and Live Tracking, referred to collectively herein as the "Accused Products."

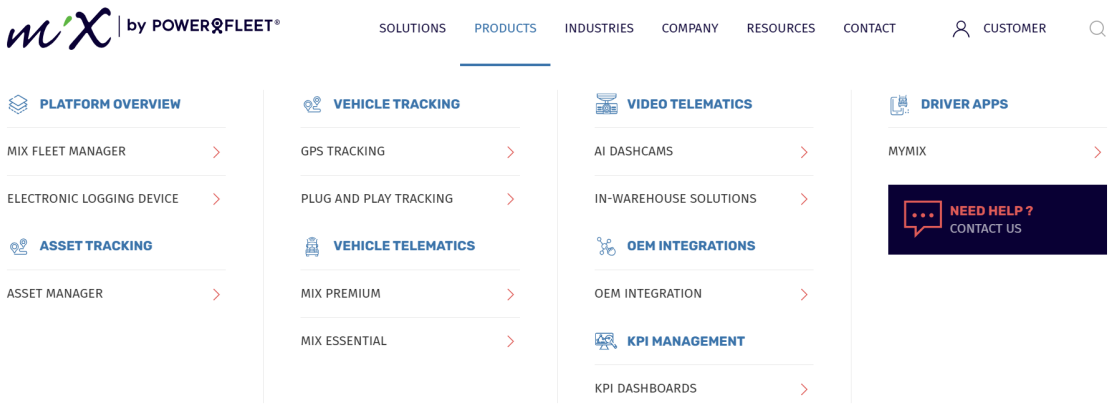

Figure 1

GPS Tracking | MiX by Powerfleet - MiX by Powerfleet (mixtelematics.com)

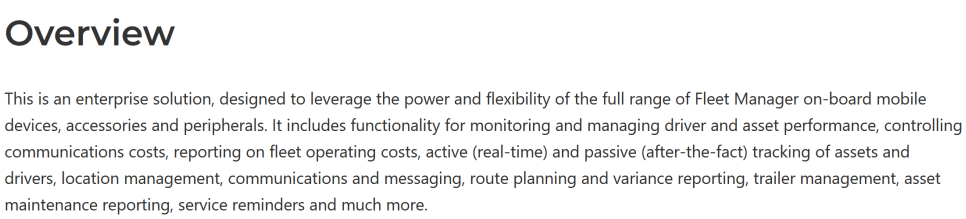

Figure 2

https://mixhelpcentre.mixtelematics.com/hc/en-us/articles/360018422539-Introduction-to-MiX-Fleet-Manager

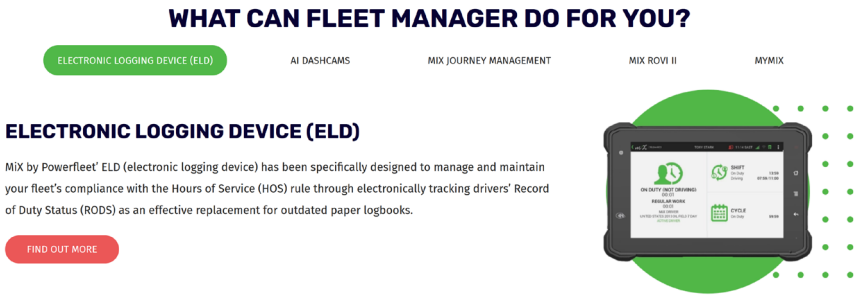

Figure 3

https://www.mixtelematics.com/us/products/mix-fleet-manager/

JURISDICTION AND VENUE

6. 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.).

7. Defendant is subject to this Court's specific and general personal jurisdiction under due process and/or the Texas 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 Texas and in this district.

8. 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 Texas, 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.

9. Defendant has also recently admitted and submitted to personal jurisdiction and venue in this District.

PATENTS-IN-SUIT

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

10. On September 13, 2011, the USPTO duly and legally issued United States Patent No. 8,019,581 ("the '581 Patent") entitled "System and Method 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 '581 Patent is attached as Exhibit A.

11. The '581 Patent is valid and enforceable under United States Patent Laws.

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

13. Artax has not granted MiX an approval, an authorization, or a license to the rights under the '581 Patent.

14. 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.

15. 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.

16. 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.

17. 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.

U.S. Patent No. 8,169,343

18. 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.

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

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

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

22. 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.

23. 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.

24. For example, the '343 Patent states:

> Thus, a need exits [sic] 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.

25. 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.

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

26. 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.

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

28. The '412 Patent is a continuation of U.S. Patent Application No. 11/968,630, issued as U.S. Patent 8,107,608, which is a divisional of U.S. Patent Application No. 10/194,518, issued as U.S. Patent 7,333,820.

29. Artax 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.

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

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

32. For instance, the inventors of the '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 at 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.

33. 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.*

34. The inventors of the '412 Patent recognized these drawbacks are overcome by "the position determination, mapping, and routing system" that "assist[s] 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.

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

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

36. On information and belief, MiX (or those acting on its behalf) makes, uses, sells, imports and/or offers to sell the Accused Products that infringe (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.

37. On information and belief, one or more components of the Accused Products employs and provides a method for presenting navigational information using a wireless communication device including a GPS receiver.

Figure 1- 1

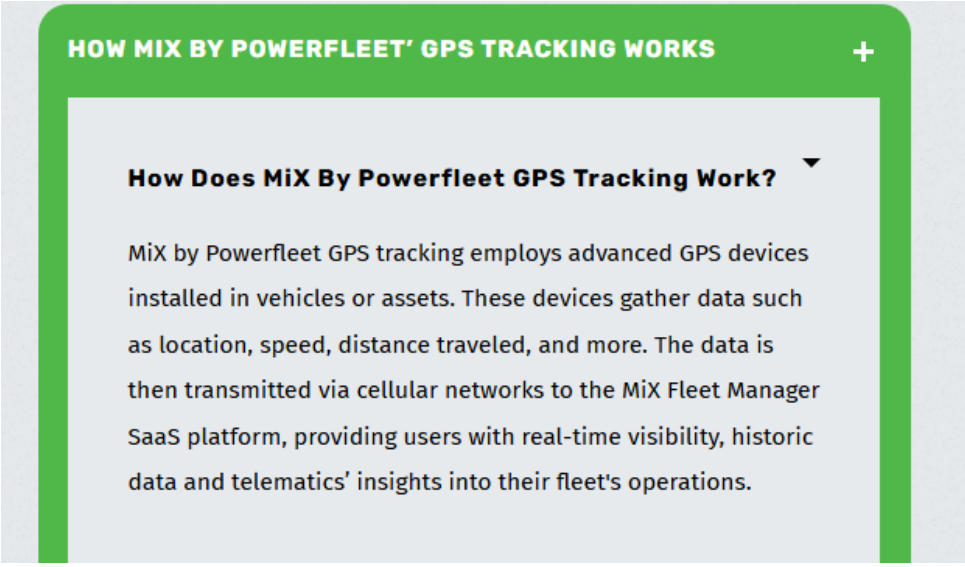

Figure 1- 2

GPS Tracking | MiX by Powerfleet - MiX by Powerfleet (mixtelematics.com)

MiX Rovi IV Product Fact Sheet

Overview

MiX Rovi IV is the next generation rugged and reliable 7" Android tablet designed to operate in harsh commercial automotive environments and works in conjunction with MiX Telematics Fleet Management products. With an integrated LTE Cat 4 (2G/3G fall-back) modem and GPS receiver, the unit will ensure reliable communication and accurate positioning. With 1.5m drop resistance and military spec vibration and shock standards, this durable device will handle the harsh conditions in industries like mining, oil & gas and agriculture. From the office, send Messages and Jobs to the driver to which he can respond and navigate to using these built-in function. Standard event violations are displayed on the screen and input menus can be customized to suit business requirements. Hours of Service allows the driver to effortlessly make status changes, view available hours, log inspections, view HOS logs and edit log data.

MiX Rovi IV consists of the following components:

- MiX Rovi IV 7" Display Kit
- MiX 4000 or MiX 6000 LTE (not legacy MiX 6000)
- MiX Fleet Manager Connection
- Sygic Navigation License

Figure 1- 3

Wireless Communication (with Integrated, Onboard internal antennas)			
Cellular	**America, LATAM**	**Australia, Brazil, Taiwan**	**EMEA, Korea, Thailand, India**
Modem	SC20-A	SC20-AU	SC20-E
LTE	B2/ B4/ B5/ B7/ B12/ B13/ B25/ B26	B1/ B3/ B5/ B7/ B8/ B28/ B40	B1/ B3/ B5/ B7/ B8/ B20/ B38/ B40/ B41
3G (WCDMA)	B1/ B2/ B4/ B5/ B8	B1/ B2/ B5/ B8	B1/ B5/ B8
GSM/EDGE	850/1900MHz	Quad-Band	Quad-Band
GPS		GPS/GLONASS	
Wireless LAN		2.4GHz/5GHz, 802.11a/b/g/n (WPA2-Enterprise)	
Bluetooth		BT4.2 LE	

Figure 1- 4

MiX_Rovi_IV_-_Product_Fact_Sheet_-_v10.pdf (mixtelematics.com)

38. On information and belief, one or more components of the Accused Products 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.

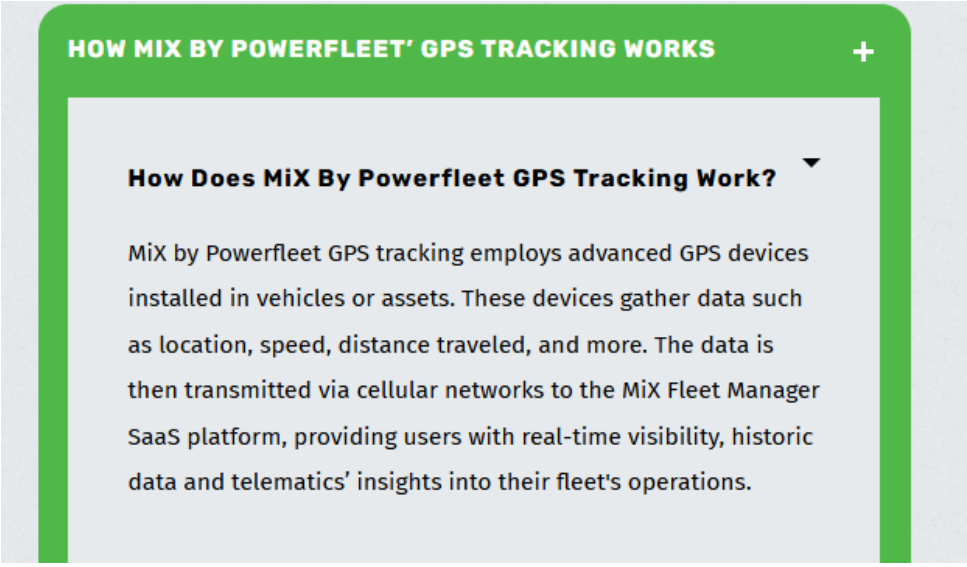

Figure 1- 5

GPS Tracking | MiX by Powerfleet - MiX by Powerfleet (mixtelematics.com)

- Click Monitor.
- Under Tracking, click Live tracking.
- Make sure the Assets tab is selected.
- Check the box next to the asset you want to view on the map.
- Click the actions arrow at the end of the row.
- Click View details to display the vehicle details according to the last received AVL.

See illustration below:

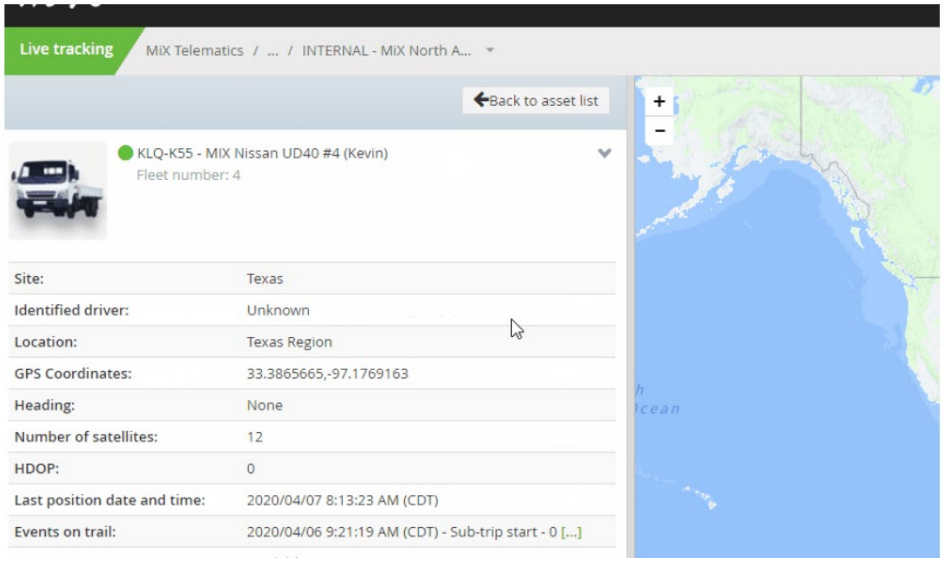

Figure 1- 6

View asset details in Live Tracking – Help Centre (mixtelematics.com)

MiX Rovi IV Product Fact Sheet

Overview

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MiX Rovi IV consists of the following components:

- MiX Rovi IV 7" Display Kit
- MiX 4000 or MiX 6000 LTE (not legacy MiX 6000)
- MiX Fleet Manager Connection
- Sygic Navigation License

Figure 1- 7

Wireless Communication (with Integrated, Onboard internal antennas)			
Cellular	**America, LATAM**	**Australia, Brazil, Taiwan**	**EMEA, Korea, Thailand, India**
Modem	SC20-A	SC20-AU	SC20-E
LTE	B2/ B4/ B5/ B7/ B12/ B13/ B25/ B26	B1/ B3/ B5/ B7/ B8/ B28/ B40	B1/ B3/ B5/ B7/ B8/ B20/ B38/ B40/ B41
3G (WCDMA)	B1/ B2/ B4/ B5/ B8	B1/ B2/ B5/ B8	B1/ B5/ B8
GSM/EDGE	850/1900MHz	Quad-Band	Quad-Band
GPS		GPS/GLONASS	
Wireless LAN		2.4GHz/5GHz, 802.11a/b/g/n (WPA2-Enterprise)	
Bluetooth		BT4.2 LE	

Figure 1- 8

MiX_Rovi_IV_-_Product_Fact_Sheet_-_v10.pdf (mixtelematics.com)

39. On information and belief, one or more components of the Accused Products 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.

The plot route feature gives you the ability to identify the optimal (fastest) routes.

Activating this map tool allows you to easily add multiple waypoints and view the plotted route's directions, distance and duration.

Please note: ***the map tool must be enabled on an organization level and the Live tracking - Plot route user permission is required.***

This is only supported on HERE maps.

- Click Monitor.
- Under Tracking, click Live tracking.
- On the map toolbar, click Plot route:

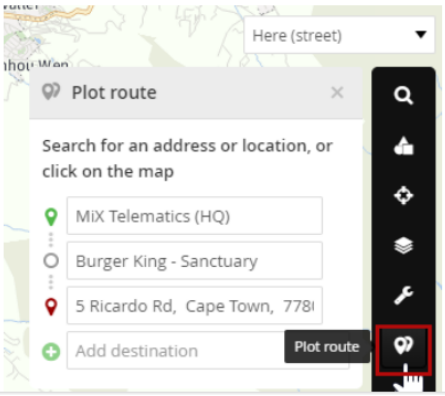


Figure 1- 9

Plot route on the map – Help Centre (mixtelematics.com)

40. On information and belief, one or more components of the Accused Products 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.

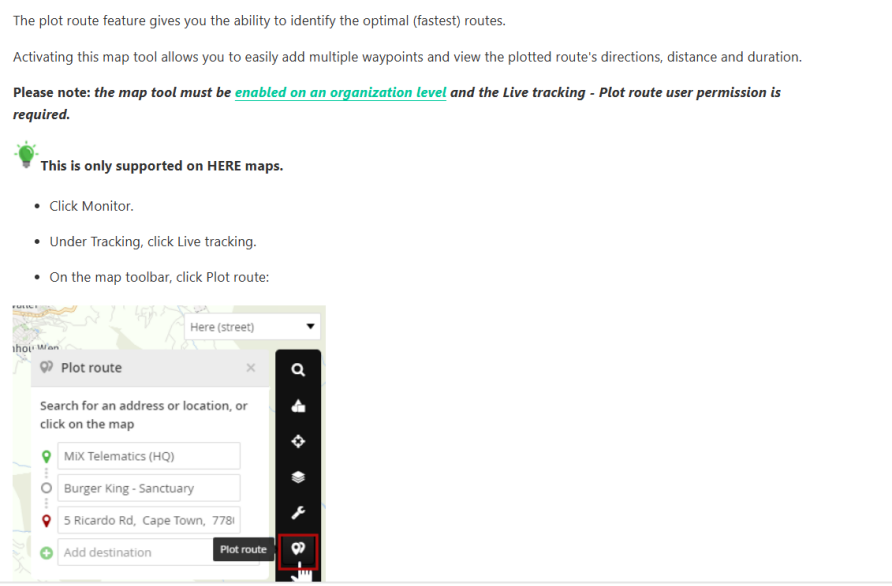


Figure 1- 10

Plot route on the map – Help Centre (mixtelematics.com)

Features	
Navigation	Sygic 3D Navigation with Wi-Fi updateable maps
Performance based driver feedback	Audible alerts and on screen notifications of driver errors e.g. over-speeding, harsh braking
Fuel data capture	Drivers can capture fuel cost and volume.
Customisable data inputs	Data inputs can be customised according to individual requirements specific to the operational environment of the Fleet Manager.
Jobs	Receive, respond and navigate to jobs
Messaging	Receive and respond to text messages using predefined responses or free text.
Hours of Service	Drivers can make status changes, view available hours, log inspections, view and edit HOS log data.
Multiple Mounting options	The Rovi IV can be fixed mounted or mounted on cradle mount for removable applications. Optional security lock is also available to lock display in the cradle. RAM and VESA mount compatible.
Connected	Built-in LTE modem for data connectivity (requires a SIM card in the device). SIM and SD-Card compartment lockable to avoid tampering.
Rugged	With 1.5m (59") drop resistance, IP66 dust and water rating. Anti-Vibration and Shock standard to US Military MIL-STD-810G rated.

Figure 1- 11

MiX_Rovi_IV_-_Product_Fact_Sheet_-_v10.pdf (mixtelematics.com)

41. On information and belief, one or more components of the Accused Products 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.

Instead of applying deny permissions or negative permissions (which the system does not cater for) where an administrator would for example want users to view all the assets in all the sites for an organization **except** the one site you would successfully implement this using a security group.

In other words if you want to give permissions to everything but want to *exclude* only one or a few sites, , that could for example include the management vehicles, you can multi-select sites and only give the desired permission to those selected.

The reason for this is that we give permissions from a level down in the tree, so you cannot exclude one site down in the tree, but you can multi-select many sites and apply the same permissions to them.

- Go to Manage.
- Under User admin, click Security groups.
- Click on the Add Security group button,
- Enter a descriptive name for the security group.
- Select the group membership.
- Click Save to create the group.
- Click Add permissions.
- Multi-select *all the sites* except the site(s) you want to exclude.
- Now select a profile for all those sites.
- Assign a role to the sites.
- Click Save.

Figure 1- 12

Exclude viewing permissions for a security group – Help Centre (mixtelematics.com)

42. On information and belief, one or more components of the Accused Products 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.

MiX Rovi IV Product Fact Sheet

Overview

MiX Rovi IV is the next generation rugged and reliable 7" Android tablet designed to operate in harsh commercial automotive environments and works in conjunction with MiX Telematics Fleet Management products. With an integrated LTE Cat 4 (2G/3G fall-back) modem and GPS receiver, the unit will ensure reliable communication and accurate positioning. With 1.5m drop resistance and military spec vibration and shock standards, this durable device will handle the harsh conditions in industries like mining, oil & gas and agriculture. From the office, send Messages and Jobs to the driver to which he can respond and navigate to using these built-in function. Standard event violations are displayed on the screen and input menus can be customized to suit business requirements. Hours of Service allows the driver to effortlessly make status changes, view available hours, log inspections, view HOS logs and edit log data.

MiX Rovi IV consists of the following components:

- MiX Rovi IV 7" Display Kit
- MiX 4000 or MiX 6000 LTE (not legacy MiX 6000)
- MiX Fleet Manager Connection
- Sygic Navigation License

Figure 1- 13

Wireless Communication (with Integrated, Onboard internal antennas)			
Cellular	**America, LATAM**	**Australia, Brazil, Taiwan**	**EMEA, Korea, Thailand, India**
Modem	SC20-A	SC20-AU	SC20-E
LTE	B2/ B4/ B5/ B7/ B12/ B13/ B25/ B26	B1/ B3/ B5/ B7/ B8/ B28/ B40	B1/ B3/ B5/ B7/ B8/ B20/ B38/ B40/ B41
3G (WCDMA)	B1/ B2/ B4/ B5/ B8	B1/ B2/ B5/ B8	B1/ B5/ B8
GSM/EDGE	850/1900MHz	Quad-Band	Quad-Band
GPS		GPS/GLONASS	
Wireless LAN		2.4GHz/5GHz, 802.11a/b/g/n (WPA2-Enterprise)	
Bluetooth		BT4.2 LE	

Figure 1- 14

MiX_Rovi_IV_-_Product_Fact_Sheet_-_v10.pdf (mixtelematics.com)

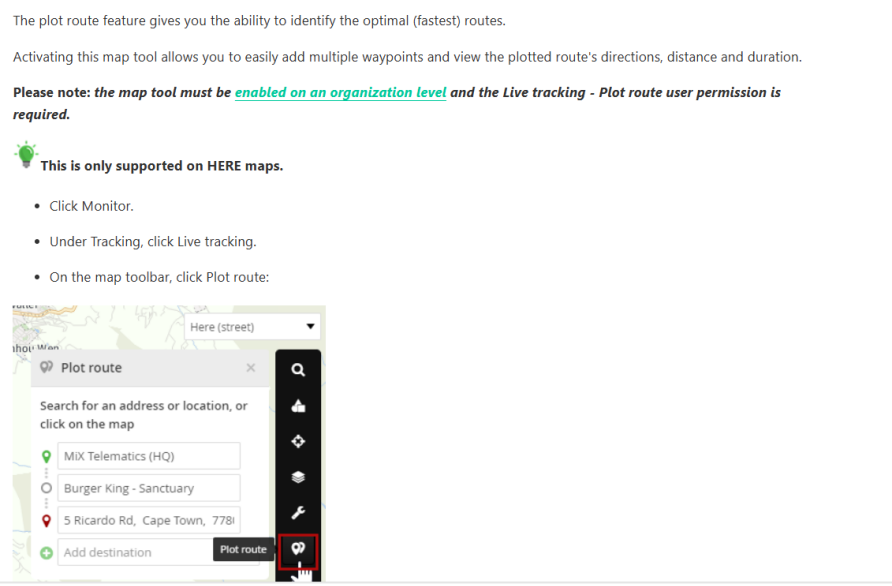


Figure 1- 15

Plot route on the map – Help Centre (mixtelematics.com)

43. On information and belief, one or more components of the Accused Products 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.

- Add additional waypoints by clicking in the Add destination box and dropping another pin on the map or by typing an address or location. *The previous endpoint will become a waypoint and the new destination will become the end location/address of the route.* You can add up to ten destinations (stops) to a route.

When you have selected three or more points you can drag and drop the destinations into a different order by moving them up or down and the map will update accordingly with the shortest route.

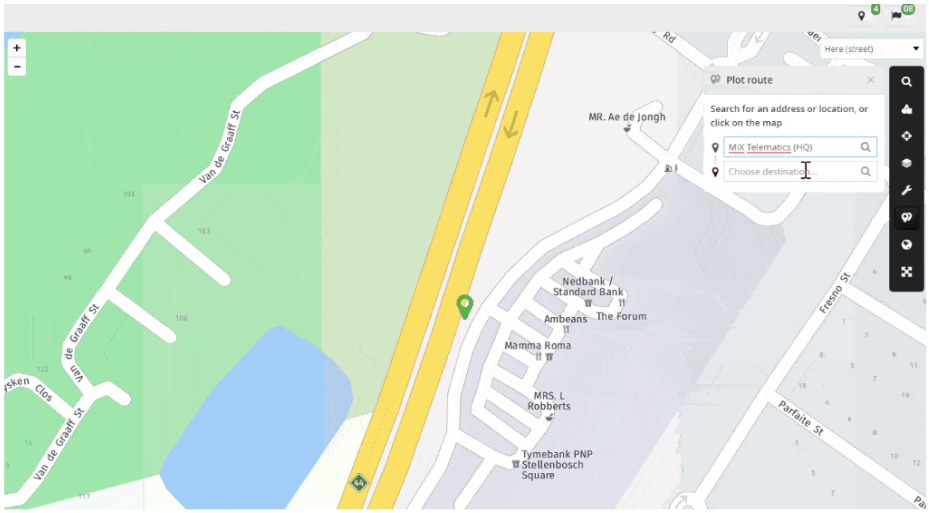


Figure 1- 16

[Plot route on the map – Help Centre (mixtelematics.com)]

MiX Rovi IV Product Fact Sheet

Overview

MiX Rovi IV is the next generation rugged and reliable 7" Android tablet designed to operate in harsh commercial automotive environments and works in conjunction with MiX Telematics Fleet Management products. With an integrated LTE Cat 4 (2G/3G fall-back) modem and GPS receiver, the unit will ensure reliable communication and accurate positioning. With 1.5m drop resistance and military spec vibration and shock standards, this durable device will handle the harsh conditions in industries like mining, oil & gas and agriculture. From the office, send Messages and Jobs to the driver to which he can respond and navigate to using these built-in function. Standard event violations are displayed on the screen and input menus can be customized to suit business requirements. Hours of Service allows the driver to effortlessly make status changes, view available hours, log inspections, view HOS logs and edit log data.

MiX Rovi IV consists of the following components:

- MiX Rovi IV 7" Display Kit
- MiX 4000 or MiX 6000 LTE (not legacy MiX 6000)
- MiX Fleet Manager Connection
- Sygic Navigation License

Figure 1- 17

Wireless Communication (with Integrated, Onboard internal antennas)			
Cellular	**America, LATAM**	**Australia, Brazil, Taiwan**	**EMEA, Korea, Thailand, India**
Modem	SC20-A	SC20-AU	SC20-E
LTE	B2/ B4/ B5/ B7/ B12/ B13/ B25/ B26	B1/ B3/ B5/ B7/ B8/ B28/ B40	B1/ B3/ B5/ B7/ B8/ B20/ B38/ B40/ B41
3G (WCDMA)	B1/ B2/ B4/ B5/ B8	B1/ B2/ B5/ B8	B1/ B5/ B8
GSM/EDGE	850/1900MHz	Quad-Band	Quad-Band
GPS		GPS/GLONASS	
Wireless LAN		2.4GHz/5GHz, 802.11a/b/g/n (WPA2-Enterprise)	
Bluetooth		BT4.2 LE	

Figure 1- 18

MiX_Rovi_IV_-_Product_Fact_Sheet_-_v10.pdf (mixtelematics.com)

44. On information and belief, one or more components of the Accused Products 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.

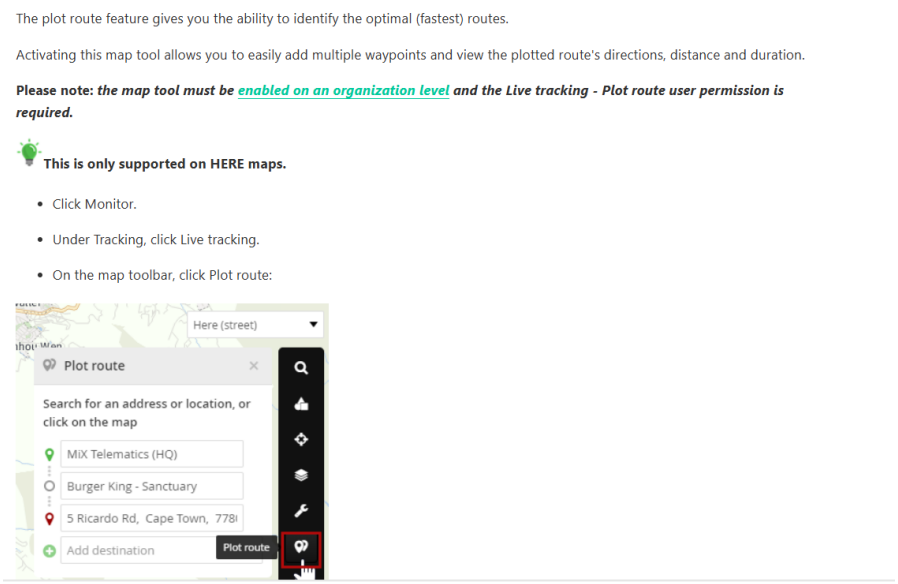


Figure 1- 19

Plot route on the map – Help Centre (mixtelematics.com)

MiX Rovi IV Product Fact Sheet

Overview

MiX Rovi IV is the next generation rugged and reliable 7" Android tablet designed to operate in harsh commercial automotive environments and works in conjunction with MiX Telematics Fleet Management products. With an integrated LTE Cat 4 (2G/3G fall-back) modem and GPS receiver, the unit will ensure reliable communication and accurate positioning. With 1.5m drop resistance and military spec vibration and shock standards, this durable device will handle the harsh conditions in industries like mining, oil & gas and agriculture. From the office, send Messages and Jobs to the driver to which he can respond and navigate to using these built-in function. Standard event violations are displayed on the screen and input menus can be customized to suit business requirements. Hours of Service allows the driver to effortlessly make status changes, view available hours, log inspections, view HOS logs and edit log data.

MiX Rovi IV consists of the following components:

- MiX Rovi IV 7" Display Kit
- MiX 4000 or MiX 6000 LTE (not legacy MiX 6000)
- MiX Fleet Manager Connection
- Sygic Navigation License

Features	
Navigation	Sygic 3D Navigation with Wi-Fi updateable maps
Performance based driver feedback	Audible alerts and on screen notifications of driver errors e.g. over-speeding, harsh braking
Fuel data capture	Drivers can capture fuel cost and volume.
Customisable data inputs	Data inputs can be customised according to individual requirements specific to the operational environment of the Fleet Manager.
Jobs	Receive, respond and navigate to jobs
Messaging	Receive and respond to text messages using predefined responses or free text.
Hours of Service	Drivers can make status changes, view available hours, log inspections, view and edit HOS log data.
Multiple Mounting options	The Rovi IV can be fixed mounted or mounted on cradle mount for removable applications. Optional security lock is also available to lock display in the cradle. RAM and VESA mount compatible.
Connected	Built-in LTE modem for data connectivity (requires a SIM card in the device). SIM and SD-Card compartment lockable to avoid tampering.

Figure 1- 20

MiX_Rovi_IV_-_Product_Fact_Sheet_-_v10.pdf (mixtelematics.com)

45. On information and belief, MiX 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 Accused Products.

46. MiX'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

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, MiX (or those acting on its behalf) makes, uses, sells, imports and/or offers to sell Accused Products that infringe (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.

49. On information and belief, one or more components of Accused Products 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.

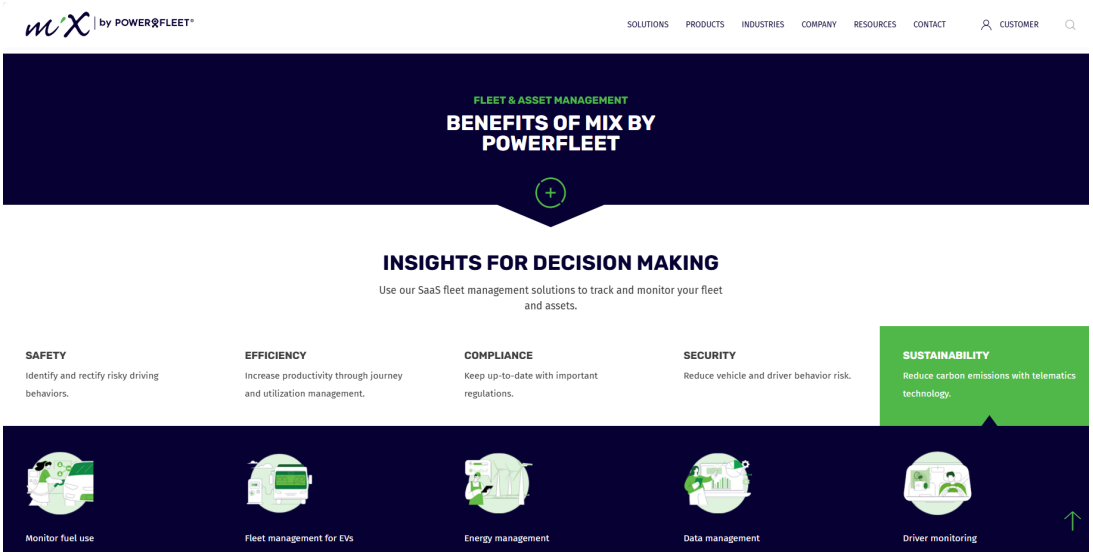


Figure 2- 1

Telematics Solutions - MiX by Powerfleet (mixtelematics.com)

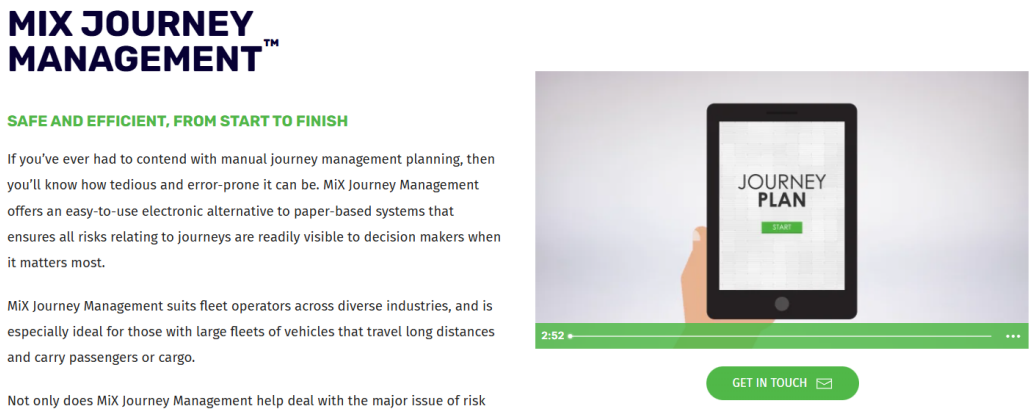


Figure 2- 2

Journey Management - MiX by Powerfleet (mixtelematics.com)

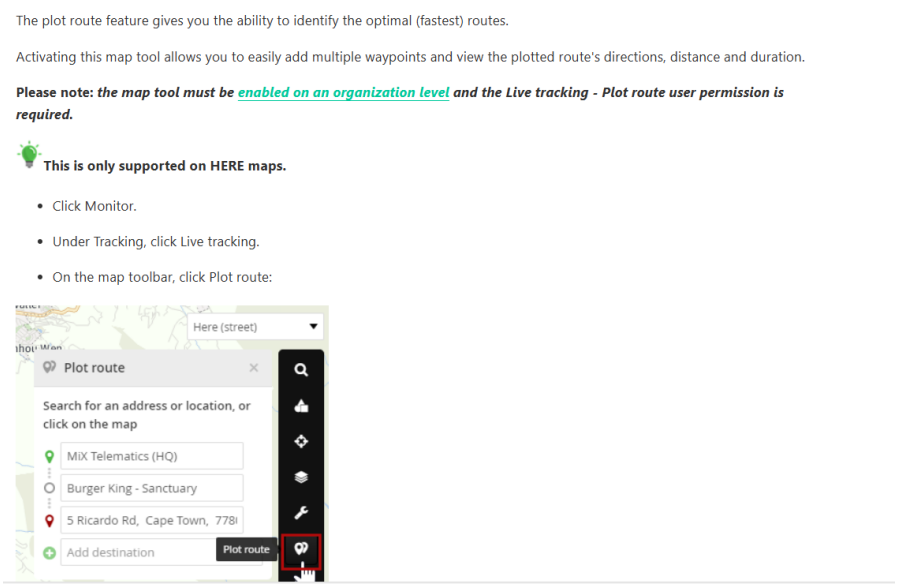


Figure 2- 3

Plot route on the map – Help Centre (mixtelematics.com)

50. On information and belief, one or more components of Accused Products 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.

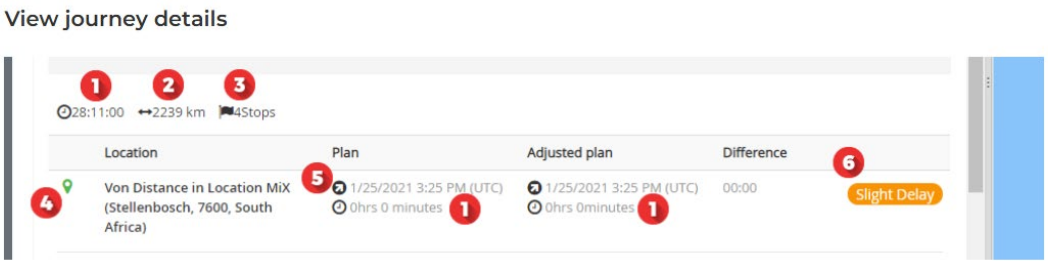
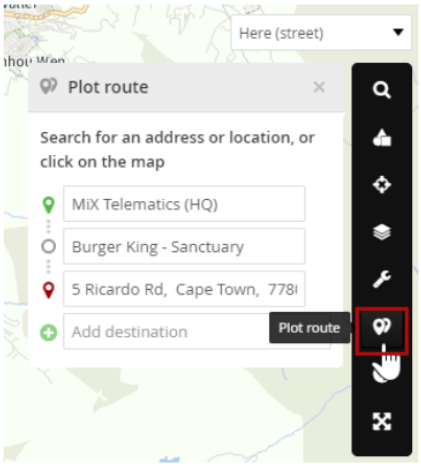


Figure 2- 4

5. The arrow icon shows the planned departure and planned arrival times for each stop. *The adjusted plan is recalculated as the journey progresses and will update the arrival and departure times accordingly in this column. The background colour of the arrow will change to green, amber or red if the estimated arrival and departure is early, on time, slight delay or delayed (and depending on the values set in the config).* A difference in time from the plan to the actual time value is indicated in the next column.
   - - shows the planned departure time.
   - - shows the planned arrival time.

Figure 2- 5

Live journey monitoring – Help Centre (mixtelematics.com)



- The starting point will be indicated by a green pin on the map. Route selection can be performed by either address or location. Users can also select the starting point by dropping a green pin on the map by clicking anywhere on the map. The pin can be dragged around to change the address.
- The destination can be created in the same way as the starting point and will be indicated by a red pin. When hovering over the red pin you will see the route's duration and time.

Figure 2- 6

When you have selected three or more points you can drag and drop the destinations into a different order by moving them up or down and the map will update accordingly with the shortest route.

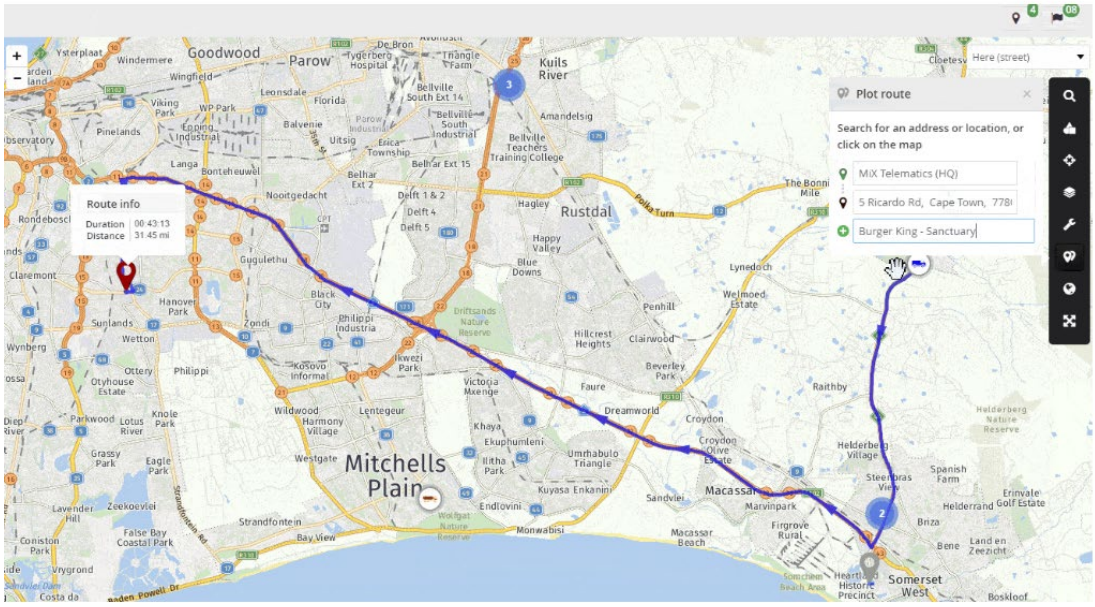
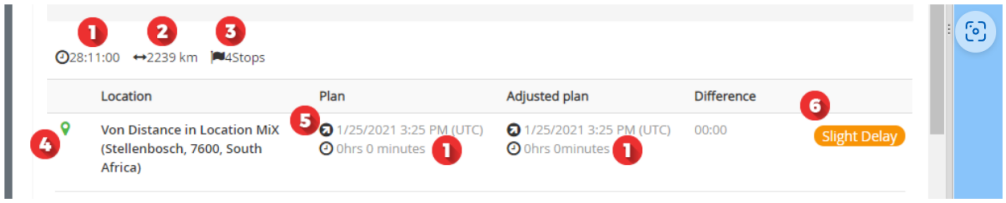


Figure 2- 7

[Plot route on the map – Help Centre (mixtelematics.com)]

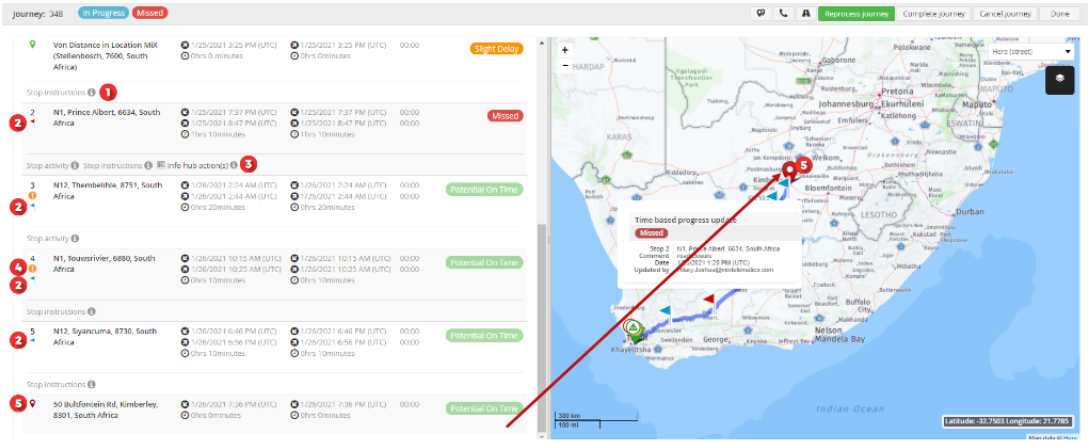
51. On information and belief, one or more components of Accused Products employs and provides a machine-readable medium storing a set of executable instructions for causing a processor of a system to perform a method of planning a route comprising the step of determining at least one stop point associated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



1. The clock icon shows the entire duration of the journey at the top and indicates the planned duration at each stop location, i.e. how long is the driver supposed to stay at the stop. The duration for the *adjusted plan* will show you the exact duration that you stayed at the stop. If the driver stopped for exactly the same duration as the plan or less, the icon will change to green. If the stop duration was over the specified time the icon colour will change to red.

Figure 2- 8

View details for each destination waypoint or stop location



1. Click the 'i' to view the stop activity or the stop instructions.
2. The blue flag indicates the anticipated stop locations / destination waypoints. The number of the stop is shown above the flag. After you reached a stop location, the colour of the flag will change to green, orange or red depending on whether you were on time, slightly delayed or delayed. (*A blue pin indicates a transit waypoint. The duration is not monitored as this is used to guide the route to go through the location and is not a planned stop.*)
3. Shows the amount of info hub action comments. View the last 3 comments in a tooltip by clicking the 'i' next to the Info hub actions. The tooltip will display the comment, who created it, as well as the date it was created.

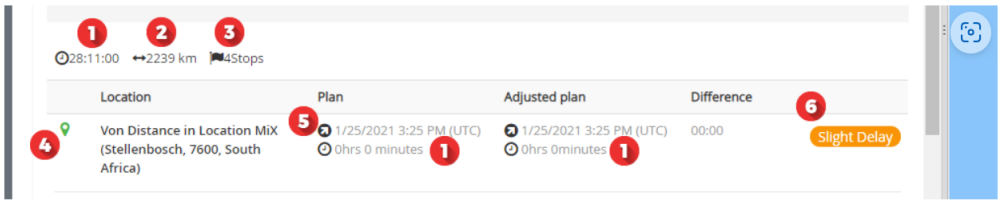
Figure 2- 9

- When creating the stop, you indicate why the driver has to stop there, called the stop activity:
  - Loading
  - Off loading
  - Rest stop
  - Fuel

Figure 2- 10

Live journey monitoring – Help Centre (mixtelematics.com)

52. On information and belief, one or more components of Accused Products 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.



1. The clock icon shows the entire duration of the journey at the top and indicates the planned duration at each stop location, i.e. how long is the driver supposed to stay at the stop. The duration for the *adjusted plan* will show you the exact duration that you stayed at the stop. If the driver stopped for exactly the same duration as the plan or less, the icon will change to green. If the stop duration was over the specified time the icon colour will change to red.

Figure 2- 11

Live journey monitoring – Help Centre (mixtelematics.com)

- Add additional waypoints by clicking in the Add destination box and dropping another pin on the map or by typing an address or location. *The previous endpoint will become a waypoint and the new destination will become the end location/address of the route.* You can add up to ten destinations (stops) to a route.

When you have selected three or more points you can drag and drop the destinations into a different order by moving them up or down and the map will update accordingly with the shortest route.

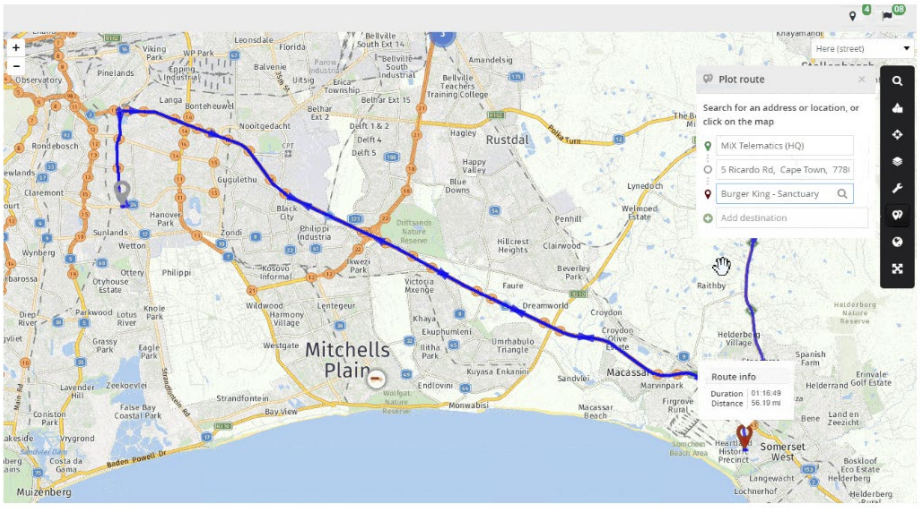


Figure 2- 12

Plot route on the map – Help Centre (mixtelematics.com)

53. On information and belief, one or more components of Accused Products 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.

- Add additional waypoints by clicking in the Add destination box and dropping another pin on the map or by typing an address or location. *The previous endpoint will become a waypoint and the new destination will become the end location/address of the route.* You can add up to ten destinations (stops) to a route.

When you have selected three or more points you can drag and drop the destinations into a different order by moving them up or down and the map will update accordingly with the shortest route.

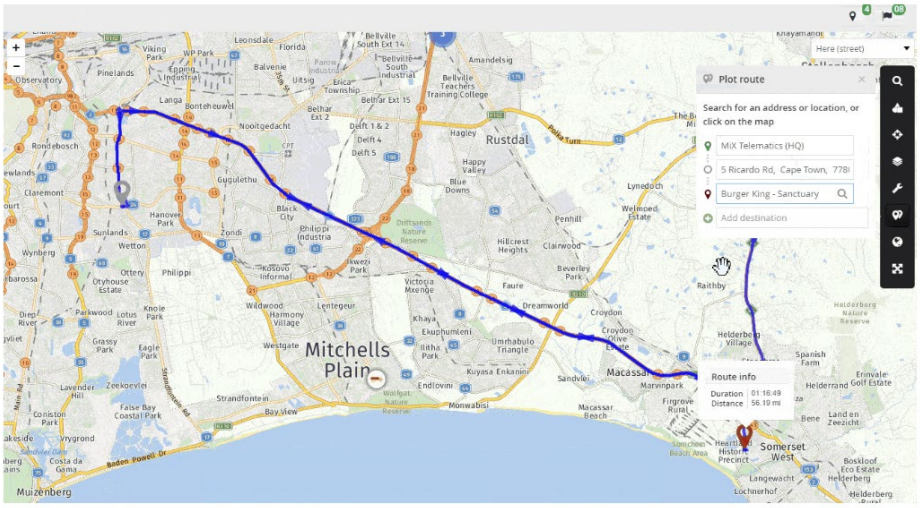
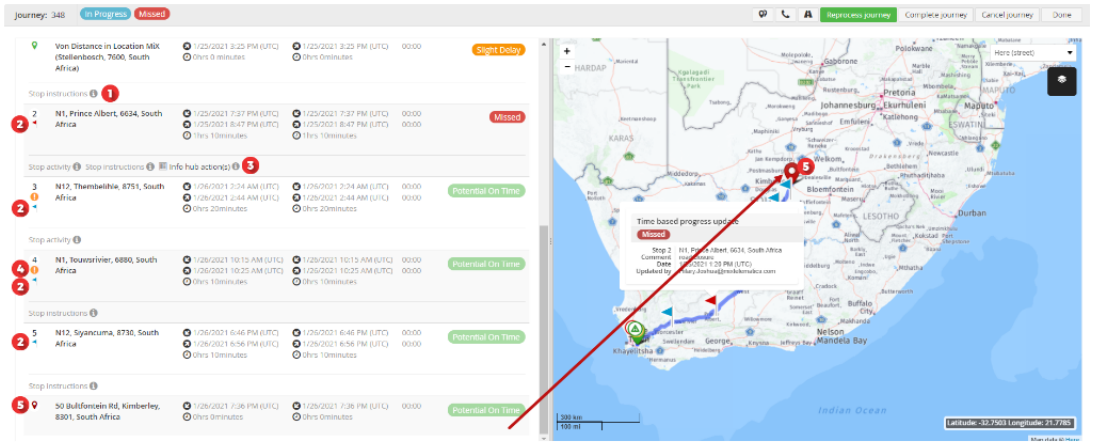


Figure 2- 13

[Plot route on the map – Help Centre (mixtelematics.com)]

View details for each destination waypoint or stop location



1. Click the 'i' to view the stop activity or the stop instructions.
2. The blue flag indicates the anticipated stop locations / destination waypoints. The number of the stop is shown above the flag. After you reached a stop location, the colour of the flag will change to green, orange or red depending on whether you were on time, slightly delayed or delayed. (*A blue pin indicates a transit waypoint. The duration is not monitored as this is used to guide the route to go through the location and is not a planned stop.*)
3. Shows the amount of info hub action comments. View the last 3 comments in a tooltip by clicking the 'i' next to the Info hub actions. The tooltip will display the comment, who created it, as well as the date it was created.

Figure 2- 14

- When creating the stop, you indicate why the driver has to stop there, called the stop activity:
  - Loading
  - Off loading
  - Rest stop
  - Fuel

Figure 2- 15

Live journey monitoring – Help Centre (mixtelematics.com)

54. On information and belief, one or more components of Accused Products 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.

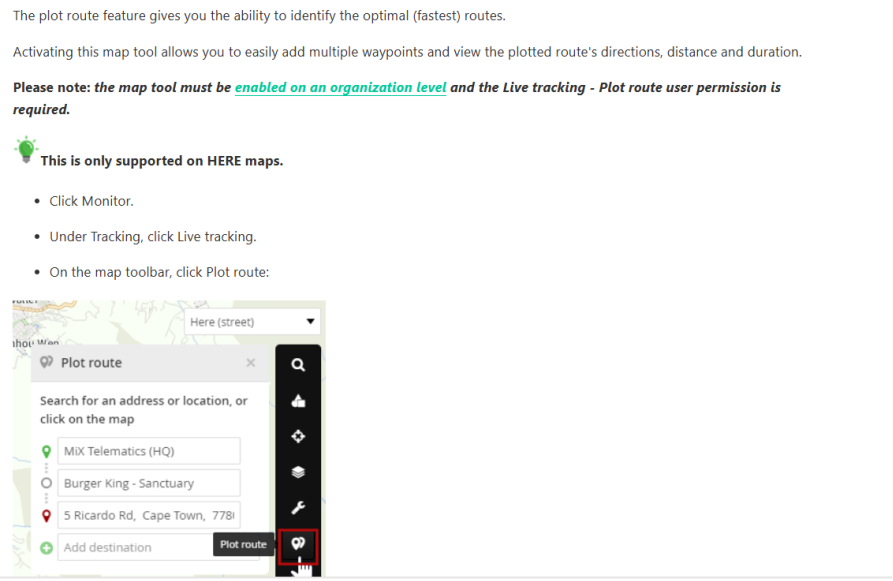
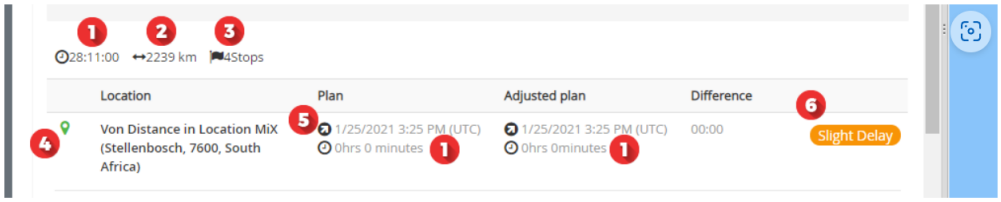


Figure 2- 16

Plot route on the map – Help Centre (mixtelematics.com)

55. On information and belief, one or more components of Accused Products 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.



1. The clock icon shows the entire duration of the journey at the top and indicates the planned duration at each stop location, i.e. how long is the driver supposed to stay at the stop. The duration for the *adjusted plan* will show you the exact duration that you stayed at the stop. If the driver stopped for exactly the same duration as the plan or less, the icon will change to green. If the stop duration was over the specified time the icon colour will change to red.

Figure 2- 17

Live journey monitoring – Help Centre (mixtelematics.com)

- Add additional waypoints by clicking in the Add destination box and dropping another pin on the map or by typing an address or location. *The previous endpoint will become a waypoint and the new destination will become the end location/address of the route.* You can add up to ten destinations (stops) to a route.

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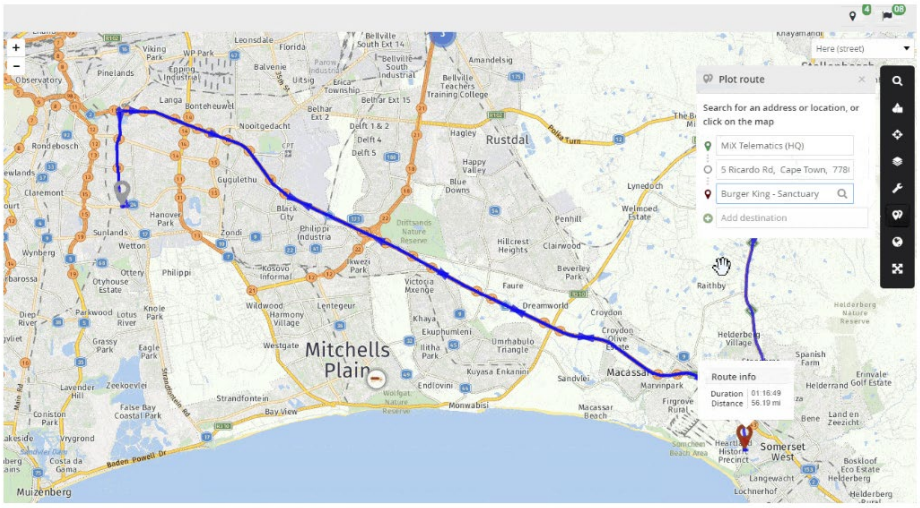
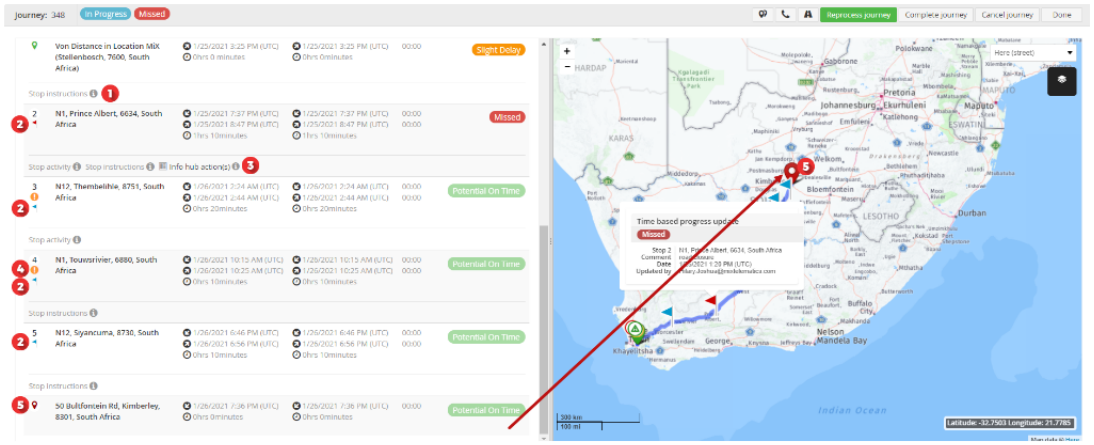


Figure 2- 18

[Plot route on the map – Help Centre (mixtelematics.com)]

View details for each destination waypoint or stop location



1. Click the 'i' to view the stop activity or the stop instructions.
2. The blue flag indicates the anticipated stop locations / destination waypoints. The number of the stop is shown above the flag. After you reached a stop location, the colour of the flag will change to green, orange or red depending on whether you were on time, slightly delayed or delayed. (*A blue pin indicates a transit waypoint. The duration is not monitored as this is used to guide the route to go through the location and is not a planned stop.*)
3. Shows the amount of info hub action comments. View the last 3 comments in a tooltip by clicking the 'i' next to the Info hub actions. The tooltip will display the comment, who created it, as well as the date it was created.

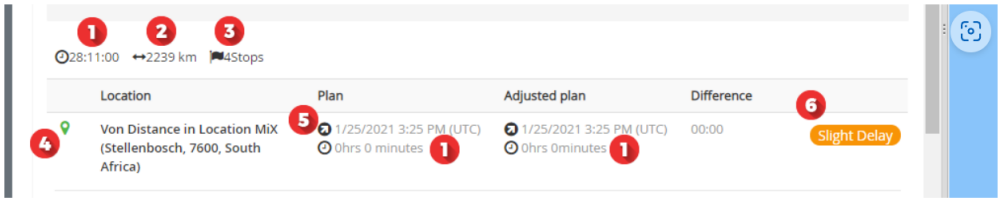
Figure 2- 19

- When creating the stop, you indicate why the driver has to stop there, called the stop activity:
  - Loading
  - Off loading
  - Rest stop
  - Fuel

Figure 2- 20

Live journey monitoring – Help Centre (mixtelematics.com)

56. On information and belief, one or more components of Accused Products 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.



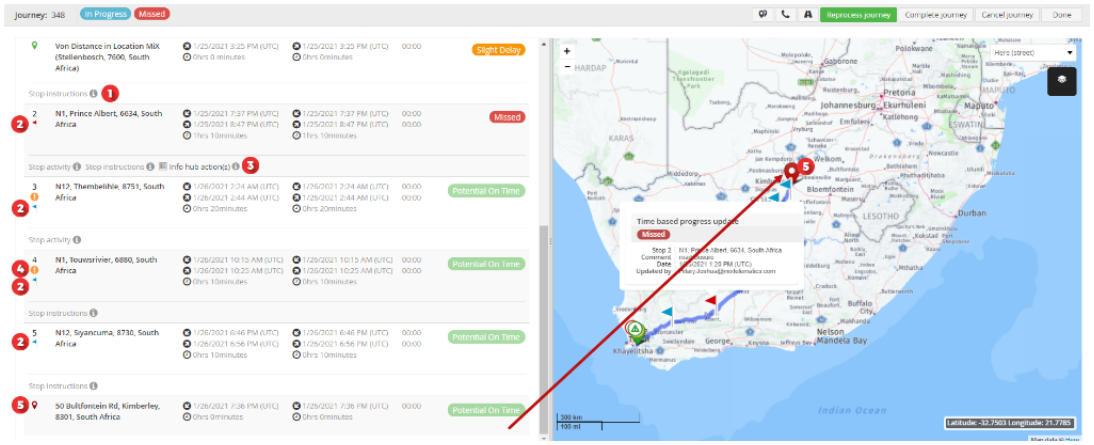
1. The clock icon shows the entire duration of the journey at the top and indicates the planned duration at each stop location, i.e. how long is the driver supposed to stay at the stop. The duration for the *adjusted plan* will show you the exact duration that you stayed at the stop. If the driver stopped for exactly the same duration as the plan or less, the icon will change to green. If the stop duration was over the specified time the icon colour will change to red.

Figure 2- 21

5. The arrow icon shows the planned departure and planned arrival times for each stop. *The adjusted plan is recalculated as the journey progresses and will update the arrival and departure times accordingly in this column. The background colour of the arrow will change to green, amber or red if the estimated arrival and departure is early, on time, slight delay or delayed (and depending on the values set in the config).* A difference in time from the plan to the actual time value is indicated in the next column.
   - - shows the planned departure time.
   - - shows the planned arrival time.

Figure 2- 22

View details for each destination waypoint or stop location



1. Click the 'i' to view the stop activity or the stop instructions.
2. The blue flag indicates the anticipated stop locations / destination waypoints. The number of the stop is shown above the flag. After you reached a stop location, the colour of the flag will change to green, orange or red depending on whether you were on time, slightly delayed or delayed. (*A blue pin indicates a transit waypoint. The duration is not monitored as this is used to guide the route to go through the location and is not a planned stop.*)
3. Shows the amount of info hub action comments. View the last 3 comments in a tooltip by clicking the 'i' next to the Info hub actions. The tooltip will display the comment, who created it, as well as the date it was created.

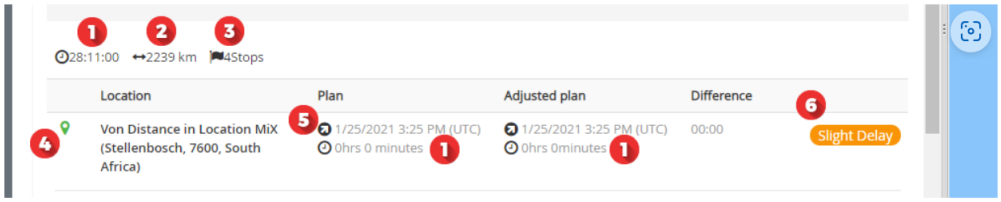
Figure 2- 23

- When creating the stop, you indicate why the driver has to stop there, called the stop activity:
  - Loading
  - Off loading
  - Rest stop
  - Fuel

Figure 2- 24

Live journey monitoring – Help Centre (mixtelematics.com)

57. On information and belief, one or more components of Accused Products 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.



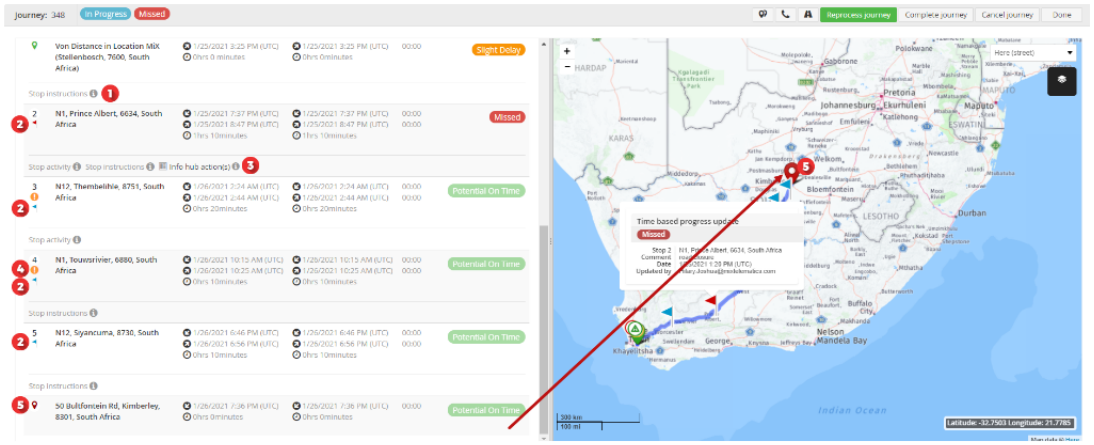
1. The clock icon shows the entire duration of the journey at the top and indicates the planned duration at each stop location, i.e. how long is the driver supposed to stay at the stop. The duration for the *adjusted plan* will show you the exact duration that you stayed at the stop. If the driver stopped for exactly the same duration as the plan or less, the icon will change to green. If the stop duration was over the specified time the icon colour will change to red.

Figure 2- 25

5. The arrow icon shows the planned departure and planned arrival times for each stop. *The adjusted plan is recalculated as the journey progresses and will update the arrival and departure times accordingly in this column. The background colour of the arrow will change to green, amber or red if the estimated arrival and departure is early, on time, slight delay or delayed (and depending on the values set in the config).* A difference in time from the plan to the actual time value is indicated in the next column.
   - - shows the planned departure time.
   - - shows the planned arrival time.

Figure 2- 26

View details for each destination waypoint or stop location



1. Click the 'i' to view the stop activity or the stop instructions.
2. The blue flag indicates the anticipated stop locations / destination waypoints. The number of the stop is shown above the flag. After you reached a stop location, the colour of the flag will change to green, orange or red depending on whether you were on time, slightly delayed or delayed. (*A blue pin indicates a transit waypoint. The duration is not monitored as this is used to guide the route to go through the location and is not a planned stop.*)
3. Shows the amount of info hub action comments. View the last 3 comments in a tooltip by clicking the 'i' next to the Info hub actions. The tooltip will display the comment, who created it, as well as the date it was created.

Figure 2- 27

- When creating the stop, you indicate why the driver has to stop there, called the stop activity:
  - Loading
  - Off loading
  - Rest stop
  - Fuel

Figure 2- 28

Live journey monitoring – Help Centre (mixtelematics.com)

58. On information and belief, MiX 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 Accused Products.

59. MiX'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

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

61. On information and belief, MiX (or those acting on its behalf) makes, uses, sells, imports and/or offers to sell the Accused Products that infringe (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.

62. On information and belief, one or more components of Accused Products 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.

CONNECTED & PROTECTED FLEET

MiX Fleet Manager is an advanced fleet management solution featuring a range of tools to better manage drivers, journeys, vehicles, and more. With robust reporting and real-time tracking, the solution maximizes return on investment by boosting fleet safety, efficiency, compliance, security, and sustainability.

The solution works by collecting and transmitting valuable vehicle and driver data through a sophisticated onboard computer. This data is hosted in one of several top-tier data centers, and information is accessible online or via a mobile app (for Android or iOS).

Our customers from around the world agree: Whatever the goal – be it to save fuel, improve safety, increase utilization, or enhance customer service – MiX Fleet Manager Premium is proven to bring about guaranteed and significant results.

Figure 3- 1

WHAT CAN FLEET MANAGER DO FOR YOU?

ELECTRONIC LOGGING DEVICE (ELD) | AI DASHCAMS | MIX JOURNEY MANAGEMENT | MIX ROVI II | MYMIX

MIX JOURNEY MANAGEMENT

An alternative to paper-based systems, this wholly online fleet management solution incorporates journey requests, journey approvals and journey monitoring. MiX Journey Management is the first system to fully integrate with a premium fleet manager system.

FIND OUT MORE

Figure 3- 2

Figure 3- 3

Effortless Fleet Management System | Fleet Telematics - MiX by Powerfleet (mixtelematics.com)

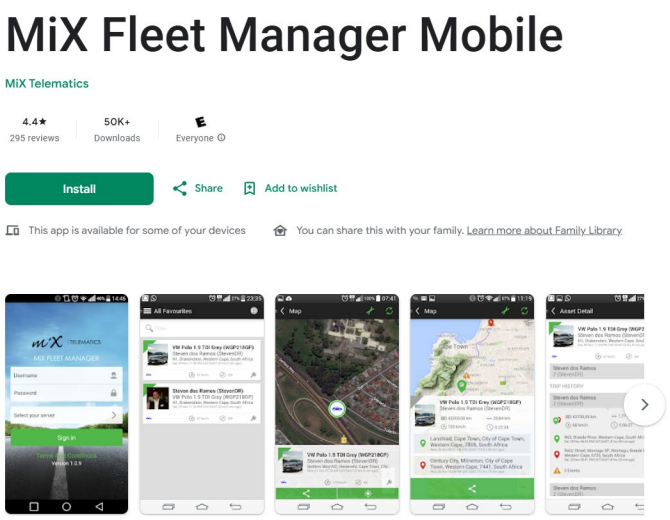


Figure 3- 4

MiX Fleet Manager Mobile - Apps on Google Play

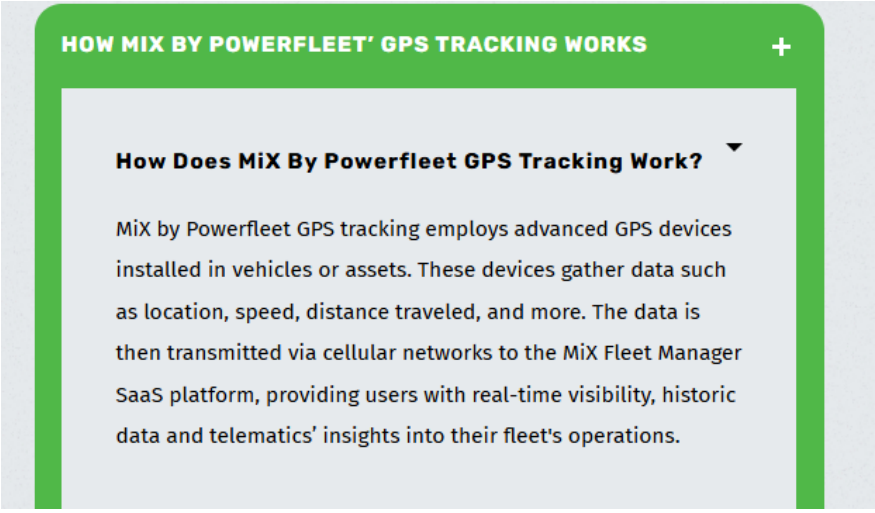


Figure 3- 5

GPS Tracking | MiX by Powerfleet - MiX by Powerfleet (mixtelematics.com)

63. On information and belief, one or more components of Accused Products 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.

MiX Rovi IV is the next generation rugged and reliable 7" Android tablet designed to operate in harsh commercial automotive environments and works in conjunction with MiX Telematics Fleet Management products. With an integrated LTE Cat 4 (2G/3G fall-back) modem and GPS receiver, the unit will ensure reliable communication and accurate positioning. With 1.5m drop resistance and military spec vibration and shock standards, this durable device will handle the harsh conditions in industries like mining, oil & gas and agriculture. From the office, send Messages and Jobs to the driver to which he can respond and navigate to using these built-in function. Standard event violations are displayed on the screen and input menus can be customized to suit business requirements. Hours of Service allows the driver to effortlessly make status changes, view available hours, log inspections, view HOS logs and edit log data.

MiX Rovi IV consists of the following components:

- MiX Rovi IV 7" Display Kit
- MiX 4000 or MiX 6000 LTE (not legacy MiX 6000)
- MiX Fleet Manager Connection
- Sygic Navigation License

Figure 3- 6

Messaging	Receive and respond to text messages using predefined responses or free text.
Hours of Service	Drivers can make status changes, view available hours, log inspections, view and edit HOS log data.
Multiple Mounting options	The Rovi IV can be fixed mounted or mounted on cradle mount for removable applications. Optional security lock is also available to lock display in the cradle. RAM and VESA mount compatible.
Connected	Built-in LTE modem for data connectivity (requires a SIM card in the device). SIM and SD-Card compartment lockable to avoid tampering.

Figure 3- 7

Wireless Communication (with Integrated, Onboard internal antennas)			
Cellular	**America, LATAM**	**Australia, Brazil, Taiwan**	**EMEA, Korea, Thailand, India**
Modem	SC20-A	SC20-AU	SC20-E
LTE	B2/ B4/ B5/ B7/ B12/ B13/ B25/ B26	B1/ B3/ B5/ B7/ B8/ B28/ B40	B1/ B3/ B5/ B7/ B8/ B20/ B38/ B40/ B41
3G (WCDMA)	B1/ B2/ B4/ B5/ B8	B1/ B2/ B5/ B8	B1/ B5/ B8
GSM/EDGE	850/1900MHz	Quad-Band	Quad-Band
GPS		GPS/GLONASS	
Wireless LAN		2.4GHz/5GHz, 802.11a/b/g/n (WPA2-Enterprise)	
Bluetooth		BT4.2 LE	

Figure 3- 8

MiX_Rovi_IV_-_Product_Fact_Sheet_-_v10.pdf (mixtelematics.com)

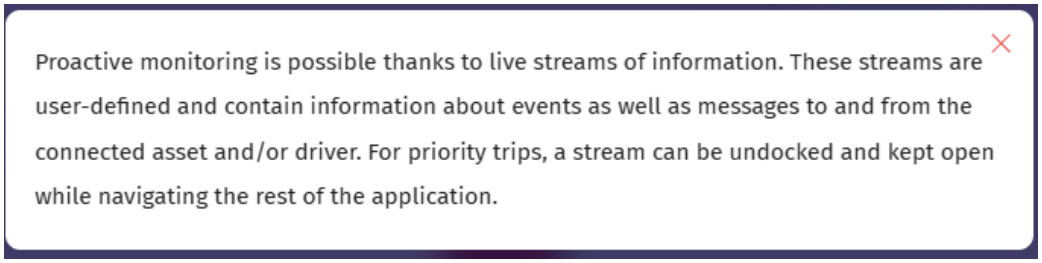


Figure 3- 9

[Effortless Fleet Management System | Fleet Telematics - MiX by Powerfleet (mixtelematics.com)]

64. On information and belief, one or more components of Accused Products 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.

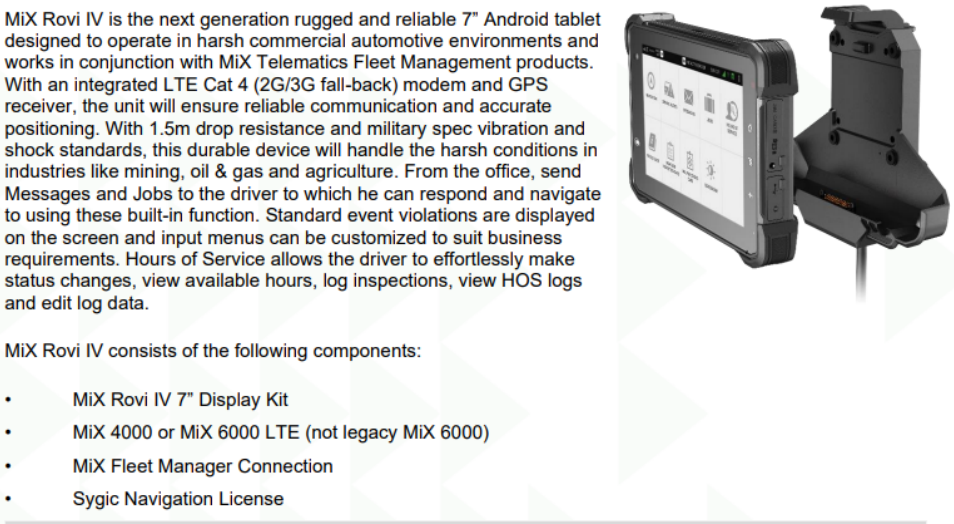


Figure 3- 10

Messaging	Receive and respond to text messages using predefined responses or free text.
Hours of Service	Drivers can make status changes, view available hours, log inspections, view and edit HOS log data.
Multiple Mounting options	The Rovi IV can be fixed mounted or mounted on cradle mount for removable applications. Optional security lock is also available to lock display in the cradle. RAM and VESA mount compatible.
Connected	Built-in LTE modem for data connectivity (requires a SIM card in the device). SIM and SD-Card compartment lockable to avoid tampering.

Figure 3- 11

Wireless Communication (with Integrated, Onboard internal antennas)			
Cellular	**America, LATAM**	**Australia, Brazil, Taiwan**	**EMEA, Korea, Thailand, India**
Modem	SC20-A	SC20-AU	SC20-E
LTE	B2/ B4/ B5/ B7/ B12/ B13/ B25/ B26	B1/ B3/ B5/ B7/ B8/ B28/ B40	B1/ B3/ B5/ B7/ B8/ B20/ B38/ B40/ B41
3G (WCDMA)	B1/ B2/ B4/ B5/ B8	B1/ B2/ B5/ B8	B1/ B5/ B8
GSM/EDGE	850/1900MHz	Quad-Band	Quad-Band
GPS		GPS/GLONASS	
Wireless LAN		2.4GHz/5GHz, 802.11a/b/g/n (WPA2-Enterprise)	
Bluetooth		BT4.2 LE	

Figure 3- 12

MiX_Rovi_IV_-_Product_Fact_Sheet_-_v10.pdf (mixtelematics.com)

Features:

- Driving alerts - alter your drivers behavior and driving style to increase safety and efficiency.
- Jobs and messaging - schedule jobs and message to your workforce; two way text messaging.

Figure 3- 13

What is the MiX Rovi IV – Help Centre (mixtelematics.com)

65. On information and belief, one or more components of Accused Products 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.

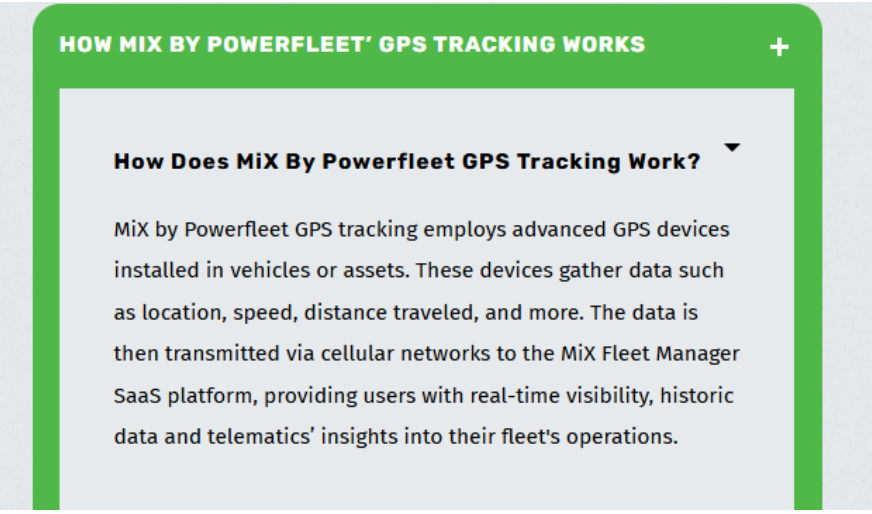


Figure 3- 14

[GPS Tracking | MiX by Powerfleet - MiX by Powerfleet (mixtelematics.com)]

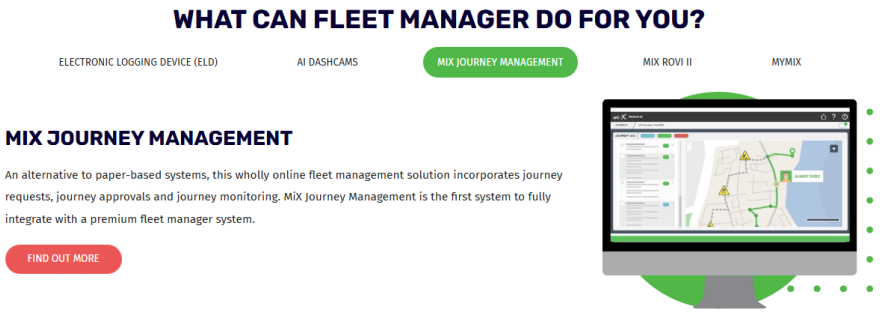


Figure 3- 15

Figure 3- 16

Effortless Fleet Management System | Fleet Telematics - MiX by Powerfleet (mixtelematics.com)

66. On information and belief, one or more components of Accused Products 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.

MiX Rovi IV is the next generation rugged and reliable 7" Android tablet designed to operate in harsh commercial automotive environments and works in conjunction with MiX Telematics Fleet Management products. With an integrated LTE Cat 4 (2G/3G fall-back) modem and GPS receiver, the unit will ensure reliable communication and accurate positioning. With 1.5m drop resistance and military spec vibration and shock standards, this durable device will handle the harsh conditions in industries like mining, oil & gas and agriculture. From the office, send Messages and Jobs to the driver to which he can respond and navigate to using these built-in function. Standard event violations are displayed on the screen and input menus can be customized to suit business requirements. Hours of Service allows the driver to effortlessly make status changes, view available hours, log inspections, view HOS logs and edit log data.

MiX Rovi IV consists of the following components:

- MiX Rovi IV 7" Display Kit
- MiX 4000 or MiX 6000 LTE (not legacy MiX 6000)
- MiX Fleet Manager Connection
- Sygic Navigation License

Figure 3- 17

Messaging	Receive and respond to text messages using predefined responses or free text.
Hours of Service	Drivers can make status changes, view available hours, log inspections, view and edit HOS log data.
Multiple Mounting options	The Rovi IV can be fixed mounted or mounted on cradle mount for removable applications. Optional security lock is also available to lock display in the cradle. RAM and VESA mount compatible.
Connected	Built-in LTE modem for data connectivity (requires a SIM card in the device). SIM and SD-Card compartment lockable to avoid tampering.

Figure 3- 18

Wireless Communication (with Integrated, Onboard internal antennas)			
Cellular	**America, LATAM**	**Australia, Brazil, Taiwan**	**EMEA, Korea, Thailand, India**
Modem	SC20-A	SC20-AU	SC20-E
LTE	B2/ B4/ B5/ B7/ B12/ B13/ B25/ B26	B1/ B3/ B5/ B7/ B8/ B28/ B40	B1/ B3/ B5/ B7/ B8/ B20/ B38/ B40/ B41
3G (WCDMA)	B1/ B2/ B4/ B5/ B8	B1/ B2/ B5/ B8	B1/ B5/ B8
GSM/EDGE	850/1900MHz	Quad-Band	Quad-Band
GPS		GPS/GLONASS	
Wireless LAN		2.4GHz/5GHz, 802.11a/b/g/n (WPA2-Enterprise)	
Bluetooth		BT4.2 LE	

Figure 3- 19

MiX_Rovi_IV_-_Product_Fact_Sheet_-_v10.pdf (mixtelematics.com)

Features:

- Driving alerts - alter your drivers behavior and driving style to increase safety and efficiency.
- Jobs and messaging - schedule jobs and message to your workforce; two way text messaging.

Figure 3- 20

What is the MiX Rovi IV – Help Centre (mixtelematics.com)

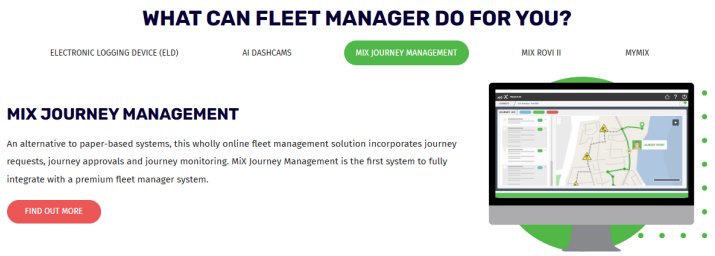


Figure 3- 21

Figure 3- 22

Effortless Fleet Management System | Fleet Telematics - MiX by Powerfleet (mixtelematics.com)

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

67. 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.

68. On information and belief, MiX 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 Accused Products.

69. MiX'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

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 MiX as follows:

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

b. finding that MiX has infringed one or more claims of the '343 Patent under 35 U.S.C. § 271(a);

c. finding that MiX 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.

Respectfully submitted,

Date: September 27, 2024

/s/ Cecil Key

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