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5
6 **IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

7 FLEET CONNECT SOLUTIONS LLC,

8 Plaintiff,

9 v.

10 EZURIO LLC (f/k/a LAIRD
11 CONNECTIVITY LLC),
Defendant.

Case No. 8:25-cv-00053

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

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COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Fleet Connect Solutions LLC (“FCS”) files this Complaint against Ezurio LLC (f/k/a Laird Connectivity LLC) (“Ezurio,” “Laird,” or “Defendant”) alleging, based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

NATURE OF THE ACTION

1. This is a patent infringement action to stop Defendant’s infringement of the following United States Patents (collectively, the “Asserted Patents”), issued by the United States Patent and Trademark Office (“USPTO”):

	Patent No.	Reference
1.	6,549,583	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6549583
2.	6,633,616	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6633616
3.	7,058,040	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7058040
4.	7,260,153	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7260153
5.	7,656,845	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7656845
6.	7,742,388	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7742388
7.	8,005,053	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8005053

2. Plaintiff seeks injunctive relief and monetary damages.

PARTIES

3. Plaintiff is a limited liability company formed under the laws of Texas with a registered office address located in Austin, Texas.

4. Upon information and belief, Defendant Ezurio is a corporation organized and existing under the laws of Delaware with a principal place of business located at 50 South Main Street, Akron, Ohio 44308.

5. Defendant Ezurio has an office and regular, established place of business at 16450 Scientific, Irvine, California 92618.

6. Ezurio can be served at its registered agent, Incorporating Services, Ltd., at 145 Baker Street, Marion, Ohio, 43302.

JURISDICTION AND VENUE

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2 7. FCS repeats and re-alleges the allegations in Paragraphs above as though
3 fully set forth in their entirety.

4 8. This is an action for infringement of United States patents arising under
5 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject matter
6 jurisdiction of the action under 28 U.S.C. § 1331 and § 1338(a).

7 9. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)-(d) and
8 1400(b) because Ezurio resides in this district, has a place of business in this district,
9 has conducted and continues to conduct business in this district, and has committed
10 and continues to commit acts of infringement in this district.

11 10. Defendant is subject to this Court’s specific and general personal
12 jurisdiction under due process due at least to Defendant’s substantial business in this
13 judicial district, including: (i) at least a portion of the infringements alleged herein;
14 (ii) regularly transacting, doing, and/or soliciting business, engaging in other
15 persistent courses of conduct, or deriving substantial revenue from goods and
16 services provided to individuals in California and in this District; and (iii) having an
17 interest in, using or possessing real property in California.

18 11. Specifically, Defendant intends to do and does business in, has committed
19 acts of infringement in, and continues to commit acts of infringement in this District
20 directly, through intermediaries, by contributing to and through its inducement of
21 third parties, and offers its products or services, including those accused of
22 infringement here, to customers and potential customers located in this District.
23 Defendant markets, sells, and delivers accused products in this district, and has
24 committed acts of infringement in this judicial district.

25 12. Defendant commits acts of infringement from this District, including, but
26 not limited to, use of the Accused Products and inducement of third parties to use
27 the Accused Products.
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THE ACCUSED PRODUCTS

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2 13. FCS repeats and re-alleges the allegations in Paragraphs above as though
3 fully set forth in their entirety.

4 14. Defendant uses, causes to be used, provides, supplies, or distributes one
5 or more computing devices, including, but not limited to, the Sona™ NX611 - WiFi
6 6 + Bluetooth® 5.3 Module; Sona™ IF573 - WiFi 6E + Bluetooth® 5.4 Module;
7 Sterling™-LWB5+ WiFi 5 + Bluetooth 5.2 Module / USB Adapter; Sterling™-
8 LWB+ WiFi 4 and Bluetooth 5.2 Modules; 60-SIPT Bluetooth and WiFi Module;
9 Sentrius™ MG100 Gateway with LTE-M/NB-IoT and Bluetooth 5; Sentrius IG60-
10 BL654 and IG60-BL654-LTE Wireless IoT Gateway; Nitrogen8M Plus SMARC;
11 Summit SOM 8M Plus System-on-Module - WiFi 5 + Bluetooth 5.3; 60 Series SOM
12 with WiFi 802.11ac and Bluetooth 5.1; Nitrogen8M Mini SBC; Nitrogen8M SBC;
13 FlexMIMO / FlexMIMO 6E MIMO Internal Antenna; and Revie Flex Series
14 Cellular Antennas, and any other devices and hardware, software, and functionality
15 that comprise substantially similar functionality (collectively, the “Accused
16 Products”).

17 15. On information and belief, the Accused Products perform wireless
18 communications and methods associated with performing and/or implementing
19 wireless communications including, but not limited to, wireless communications and
20 methods pursuant to various protocols and implementations, including, but not
21 limited to, Bluetooth, IEEE 802.11, and LTE protocols and various subsections
22 thereof, including, but not limited to, Bluetooth 5, 5.1, 5.2, 5.3, and 5.4 802.11ac,
23 802.11b, and 802.11n.

24 16. On information and belief, the wireless communications perform and/or
25 implemented by the Accused Products, among other things, transmit data over
26 various media, compute time slot channels, generate packets for network
27 transmissions, perform or cause to be performed error estimation in orthogonal
28 frequency division multiplexed (“OFDM”) receivers, and various methods of

1 processing OFDM symbols.

2 17. Defendant was notified that the Accused Products infringe the Asserted
3 Patents by a letter in February of 2024.

4 18. For these reasons and the additional reasons detailed below, the Accused
5 Products practice at least one claim of each of the Asserted Patents.

6 **COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,549,583**

7 19. FCS repeats and re-alleges the allegations in Paragraphs above as though
8 fully set forth in their entirety. For purposes of this Count I, the term “Accused
9 Products” means the Sona™ NX611 - WiFi 6 + Bluetooth® 5.3 Module; Sona™
10 IF573 - WiFi 6E + Bluetooth® 5.4 Module; Sterling™-LWB5+ WiFi 5
11 + Bluetooth 5.2 Module / USB Adapter; 60-SIPT Bluetooth and WiFi Module;
12 Sentrius™ MG100 Gateway with LTE-M/NB-IoT and Bluetooth 5; Sentrius IG60-
13 BL654 and IG60-BL654-LTE Wireless IoT Gateway; Nitrogen8M Plus SMARC;
14 Summit SOM 8M Plus System-on-Module - WiFi 5 + Bluetooth 5.3; 60 Series SOM
15 with WiFi 802.11ac and Bluetooth 5.1; Nitrogen8M Mini SBC; Nitrogen8M SBC;
16 FlexMIMO / FlexMIMO 6E MIMO Internal Antenna; and Revie Flex Series
17 Cellular Antennas, and any other devices and hardware, software, and functionality
18 that comprise substantially similar functionality.

19 20. The USPTO duly issued U.S. Patent No. 6,549,583 (the “’583 patent”) on
20 April 15, 2003, after full and fair examination of Application No. 09/790,429 which
21 was filed February 21, 2001. The ’583 patent is entitled “Optimum Phase Error
22 Metric for OFDM Pilot Tone Tracking in Wireless LAN.”

23 21. FCS owns all substantial rights, interest, and title in and to the ’583 patent,
24 including the sole and exclusive right to prosecute this action and enforce the ’583
25 patent against infringers and to collect damages for all relevant times.

26 22. The claims of the ’583 patent are not directed to an abstract idea and are
27 not limited to well-understood, routine, or conventional activity. Rather, the claimed
28

1 inventions include inventive components that improve upon the function and
2 operation of preexisting error estimation methods.

3 23. The written description of the '583 patent describes in technical detail
4 each limitation of the claims, allowing a skilled artisan to understand the scope of
5 the claims and how the non-conventional and non-generic combination of claim
6 limitations is patently distinct from and improved upon what may have been
7 considered conventional or generic in the art at the time of the invention.

8 24. FCS or its predecessors-in-interest have satisfied all statutory obligations
9 required to collect pre-filing damages for the full period allowed by law for
10 infringement of the '583 patent.

11 25. Defendant has directly infringed the claims of the '583 patent by
12 manufacturing, providing, supplying, using, distributing, selling, or offering to sell
13 the Accused Products. For instance, Defendant has directly infringed, either literally
14 or under the doctrine of equivalents, at least claim 1 of the '583 patent. As just one
15 example of infringement, Defendant, using the Accused Products, performs a
16 method of pilot phase error estimation in an orthogonal frequency division
17 multiplexed (OFDM) receiver. The method includes determining pilot reference
18 points corresponding to a plurality of pilots of an OFDM preamble waveform; and
19 estimating an aggregate phase error of a subsequent OFDM data symbol relative to
20 the pilot reference points using complex signal measurements corresponding to each
21 of the plurality of pilots of the subsequent OFDM data symbol and the pilot reference
22 points; wherein the estimating step comprises performing a maximum likelihood-
23 based estimation using the complex signal measurements corresponding to each of
24 the plurality of pilots of the subsequent OFDM data symbol and the pilot reference
25 points. *See* '583 Evidence of Use Charts, attached hereto as **Exhibit A**.

26 26. FCS has been damaged as a result of the infringing conduct by Defendant
27 alleged above. Thus, Defendant is liable to FCS in an amount that compensates it
28 for such infringements, which by law cannot be less than a reasonable royalty,

1 together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

2 **COUNT II: INFRINGEMENT OF U.S. PATENT NO. 6,633,616**

3 27. FCS repeats and re-alleges the allegations in Paragraphs above as though
4 fully set forth in their entirety. For purposes of this Count II, the term “Accused
5 Products” means the Sona™ NX611 - WiFi 6 + Bluetooth® 5.3 Module; Sona™
6 IF573 - WiFi 6E + Bluetooth® 5.4 Module; Sterling™-LWB5+ WiFi 5
7 + Bluetooth 5.2 Module / USB Adapter; 60-SIPT Bluetooth and WiFi Module;
8 Sentrius™ MG100 Gateway with LTE-M/NB-IoT and Bluetooth 5; Sentrius IG60-
9 BL654 and IG60-BL654-LTE Wireless IoT Gateway; Nitrogen8M Plus SMARC;
10 Summit SOM 8M Plus System-on-Module - WiFi 5 + Bluetooth 5.3; 60 Series SOM
11 with WiFi 802.11ac and Bluetooth 5.1; Nitrogen8M Mini SBC; Nitrogen8M SBC;
12 FlexMIMO / FlexMIMO 6E MIMO Internal Antenna; and Revie Flex Series
13 Cellular Antennas, and any other devices and hardware, software, and functionality
14 that comprise substantially similar functionality.

15 28. The USPTO duly issued U.S. Patent No. 6,633,616 (the “’616 patent”) on
16 October 14, 2003, after full and fair examination of Application No. 09/935,081
17 which was filed August 21, 2001. The ’616 patent is entitled “OFDM Pilot Tone
18 Tracking for Wireless LAN.”

19 29. FCS owns all substantial rights, interest, and title in and to the ’616 patent,
20 including the sole and exclusive right to prosecute this action and enforce the ’616
21 patent against infringers and to collect damages for all relevant times.

22 30. The claims of the ’616 patent are not directed to an abstract idea and are
23 not limited to well-understood, routine, or conventional activity. Rather, the claimed
24 inventions include inventive components that improve upon the function and
25 operation of preexisting error estimation methods.

26 31. The written description of the ’616 patent describes in technical detail
27 each limitation of the claims, allowing a skilled artisan to understand the scope of
28 the claims and how the non-conventional and non-generic combination of claim

1 limitations is patently distinct from and improved upon what may have been
2 considered conventional or generic in the art at the time of the invention.

3 32. FCS or its predecessors-in-interest have satisfied all statutory obligations
4 required to collect pre-filing damages for the full period allowed by law for
5 infringement of the '616 patent.

6 33. Defendant has directly infringed the claims of the '616 patent by
7 manufacturing, providing, supplying, using, distributing, selling, or offering to sell
8 the Accused Products. For instance, Defendant has directly infringed, either literally
9 or under the doctrine of equivalents, at least claim 12 of the '616 patent. As just one
10 example of infringement, Defendant, using the Accused Products, performs a
11 method of pilot phase error estimation in an orthogonal frequency division
12 multiplexed (OFDM) receiver. The method includes determining pilot reference
13 points corresponding to a plurality of pilots of an OFDM preamble waveform;
14 processing, in a parallel path to the determining step, the OFDM preamble waveform
15 with a fast Fourier transform; determining a phase error estimate of a subsequent
16 OFDM symbol relative to the pilot reference points; and processing, in the parallel
17 path to the determining step, the subsequent OFDM symbol with the fast Fourier
18 transform; wherein the determining the phase error estimate step is completed prior
19 to the completion of the processing of the subsequent OFDM symbol with the fast
20 Fourier transform in the parallel path. *See* '616 Evidence of Use Charts attached
21 hereto as **Exhibit B**.

22 34. FCS has been damaged as a result of the infringing conduct by Defendant
23 alleged above. Thus, Defendant is liable to FCS in an amount that compensates it
24 for such infringements, which by law cannot be less than a reasonable royalty,
25 together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

26 **COUNT III: INFRINGEMENT OF U.S. PATENT NO. 7,058,040**

27 35. FCS repeats and re-alleges the allegations in the Paragraphs above as
28 though fully set forth in their entirety. For purposes of this Count III, the term

1 “Accused Products” means the Sona™ NX611 - WiFi 6 + Bluetooth® 5.3 Module;
2 Sona™ IF573 - WiFi 6E + Bluetooth® 5.4 Module; Sterling™-LWB+ WiFi 4
3 and Bluetooth 5.2 Modules; Sentrius™ MG100 Gateway with LTE-M/NB-IoT and
4 Bluetooth 5; Sentrius IG60-BL654 and IG60-BL654-LTE Wireless IoT Gateway;
5 and Summit SOM 8M Plus System-on-Module - WiFi 5 + Bluetooth 5.3, and any
6 other devices and hardware, software, and functionality that comprise substantially
7 similar functionality.

8 36. The USPTO duly issued U.S. Patent No. 7,058,040 (the “’040 patent”) on
9 June 6, 2006, after full and fair examination of Application No. 09/962,718 which
10 was filed September 21, 2001. The ’040 patent is entitled “Channel Interference
11 Reduction.”

12 37. FCS owns all substantial rights, interest, and title in and to the ’040 patent,
13 including the sole and exclusive right to prosecute this action and enforce the ’040
14 patent against infringers and to collect damages for all relevant times.

15 38. The claims of the ’040 patent are not directed to an abstract idea and are
16 not limited to well-understood, routine, or conventional activity. Rather, the claimed
17 inventions include inventive components that improve upon the function and
18 operation of preexisting data transmission methods.

19 39. The written description of the ’040 patent describes in technical detail
20 each limitation of the claims, allowing a skilled artisan to understand the scope of
21 the claims and how the non-conventional and non-generic combination of claim
22 limitations is patently distinct from and improved upon what may have been
23 considered conventional or generic in the art at the time of the invention.

24 40. FCS or its predecessors-in-interest have satisfied all statutory obligations
25 required to collect pre-filing damages for the full period allowed by law for
26 infringement of the ’040 patent.

27 41. Defendant has directly infringed and continued to directly infringe the
28 claims of the ’040 patent through the end of its term by manufacturing, providing,

1 supplying, using, distributing, selling, or offering to sell the Accused Products. For
2 instance, Defendant has directly infringed and continued to directly infringe, either
3 literally or under the doctrine of equivalents, at least claim 1 of the '040 patent
4 through the end of its term. As just one example of infringement, Defendant, using
5 the Accused Products, performed a method for data transmission over first and
6 second media that overlap in frequency. The method included computing one or
7 more time division multiple access (TDMA) time-slot channels to be shared between
8 the first and second media for data transmission; allocating one or more time-slot
9 channels to the first medium for data transmission; allocating one or more of the
10 remaining time-slot channels to the second medium for data transmission; and
11 dynamically adjusting a number of timeslot channels assigned to one of the first and
12 second media during the data transmission to remain within limits of a desired level
13 of service. *See* '040 Evidence of Use Chart attached hereto as **Exhibit C**.

14 42. Defendant has indirectly infringed and continued to indirectly infringe the
15 '040 patent through the end of its term by inducing others to directly infringe the
16 '040 patent. Defendant has induced and continued to induce customers and end-
17 users, including, but not limited to, Defendant's customers, employees, partners, or
18 contractors, to directly infringe, either literally or under the doctrine of equivalents,
19 the '040 patent by providing or requiring use of the Accused Products. Defendant
20 has taken active steps, directly or through contractual relationships with others, with
21 the specific intent to cause them to use the Accused Products in a manner that
22 infringes one or more claims of the '040 patent, including, for example, claim 1.
23 Such steps by Defendant has included, among other things, advising or directing
24 customers, personnel, contractors, or end-users to use the Accused Products in an
25 infringing manner; advertising and promoting the use of the Accused Products in an
26 infringing manner; or distributing instructions that guide users to use the Accused
27 Products in an infringing manner. Defendant had been performing these steps,
28 which constitute induced infringement with the knowledge of the '040 patent and

1 with the knowledge that the induced acts constitute infringement. Defendant has
2 been aware that the normal and customary use of the Accused Products by others
3 would infringe the '040 patent. Defendant's inducement is ongoing.

4 43. Defendant has indirectly infringed and continued to indirectly infringe by
5 contributing to the infringement of the '040 patent through the end of its term.
6 Defendant has contributed and continued to contribute to the direct infringement of
7 the '040 patent by its customers, personnel, and contractors. The Accused Products
8 have special features that are specially designed to be used in an infringing way and
9 that have no substantial uses other than ones that infringe one or more claims of the
10 '040 patent, including, for example, claim 1. The special features constitute a
11 material part of the invention of one or more of the claims of the '040 patent and are
12 not staple articles of commerce suitable for substantial non-infringing use.
13 Defendant's contributory infringement of the '040 patent was ongoing through the
14 end of its term.

15 44. Defendant had knowledge of its infringement of the '040 patent at least as
16 of February of 2024.

17 45. Furthermore, on information and belief, Defendant has a policy or practice
18 of not reviewing the patents of others, including instructing its employees to not
19 review the patents of others, and thus have been willfully blind of FCS's patent
20 rights.

21 46. Defendant's actions were at least objectively reckless as to the risk of
22 infringing a valid patent and this objective risk was either known or should have
23 been known by Defendant.

24 47. Defendant's infringement of the '040 patent is, has been, and continued
25 to be willful, intentional, deliberate, or in conscious disregard of FCS's rights under
26 the '040 patent through the end of its term.

27 48. FCS has been damaged as a result of the infringing conduct by Defendant
28 alleged above. Thus, Defendant is liable to FCS in an amount that compensates it

1 for such infringements, which by law cannot be less than a reasonable royalty,
2 together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

3 **COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 7,260,153**

4 49. FCS repeats and re-alleges the allegations in the Paragraphs above as
5 though fully set forth in their entirety. For purposes of this Count IV, the term
6 “Accused Products” means the Sona™ NX611 - WiFi 6 + Bluetooth® 5.3 Module;
7 Sona™ IF573 - WiFi 6E + Bluetooth® 5.4 Module; Sterling™-LWB+ WiFi 4
8 and Bluetooth 5.2 Modules; Sentrius™ MG100 Gateway with LTE-M/NB-IoT and
9 Bluetooth 5; Sentrius IG60-BL654 and IG60-BL654-LTE Wireless IoT Gateway;
10 Summit SOM 8M Plus System-on-Module - WiFi 5 + Bluetooth 5.3; FlexMIMO /
11 FlexMIMO 6E MIMO Internal Antenna; and Revie Flex Series Cellular Antennas,
12 and any other devices and hardware, software, and functionality that comprise
13 substantially similar functionality.

14 50. The USPTO duly issued U.S. Patent No. 7,260,153 (the “’153 patent”) on
15 August 21, 2007, after full and fair examination of Application No. 10/423,447,
16 which was filed on April 28, 2003. The ’153 patent is entitled “Multi Input Multi
17 Output Wireless Communication Method and Apparatus Providing Extended Range
18 and Extended Rate Across Imperfectly Estimated Channels.”

19 51. FCS owns all substantial rights, interest, and title in and to the ’153 patent,
20 including the sole and exclusive right to prosecute this action and enforce the ’153
21 patent against infringers and to collect damages for all relevant times.

22 52. The claims of the ’153 patent are not directed to an abstract idea and are
23 not limited to well-understood, routine, or conventional activity. Rather, the claimed
24 inventions include inventive components that improve upon the function and
25 operation of voice and data communications systems.

26 53. The written description of the ’153 patent describes in technical detail
27 each limitation of the claims, allowing a skilled artisan to understand the scope of
28 the claims and how the non-conventional and non-generic combination of claim

1 limitations is patently distinct from and improved upon what may have been
2 considered conventional or generic in the art at the time of the invention.

3 54. Defendant has directly infringed and continues to directly infringe the
4 claims of the '153 patent by importing, selling, manufacturing, offering to sell,
5 using, providing, supplying, or distributing the Accused Products. For instance,
6 Defendant has directly infringed and continues to directly infringe, either literally or
7 under the doctrine of equivalents, at least claim 1 of the '153 patent. As just one
8 example of infringement, Defendant, using the Accused Products, performs a
9 method for evaluating a channel of a multiple-input multiple-output ("MIMO")
10 wireless communication system allowing two or more communication devices with
11 multiple radiating elements to transmit parallel data sub-streams which defines a
12 channel matrix metric of cross-talk signal-to-noise ("SNR") for the sub-streams,
13 estimates the channel matrix metric, performs a singular value decomposition
14 ("SVD") of the channel matrix metric estimate to calculate estimated channel
15 singular values, and using the channel matrix metric and estimated channel singular
16 values to calculate a crosstalk measure for the sub-streams. *See* '153 Evidence of
17 Use Charts attached hereto as **Exhibit D**.

18 55. Defendant has also indirectly infringed and continues to indirectly
19 infringe the '153 patent by inducing others to directly infringe the '153 patent.
20 Defendant has induced distributors and end-users, including, but not limited to,
21 Defendant's employees, partners, contractors, or customers, to directly infringe,
22 either literally or under the doctrine of equivalents, the '153 patent by providing or
23 requiring use of the Accused Products. Defendant took active steps, directly or
24 through contractual relationships with others, with the specific intent to cause them
25 to use the Accused Products in a manner that infringes one or more claims of the
26 '153 patent, including, for example, claim 1 of the '153 patent. Such steps by
27 Defendant include, among other things, advising or directing personnel, contractors,
28 or end-users to use the Accused Products in an infringing manner; advertising and

1 promoting the use of the Accused Products in an infringing manner; or distributing
2 instructions that guide users to use the Accused Products in an infringing manner.
3 Defendant is performing these steps, which constitute induced infringement with the
4 knowledge of the '153 patent and with the knowledge that the induced acts constitute
5 infringement. Defendant is aware that the normal and customary use of the Accused
6 Products by others would infringe the '153 patent. Defendant's inducement is
7 ongoing.

8 56. Defendant has also indirectly infringed and continues to indirectly
9 infringe by contributing to the infringement of the '153 patent. Defendant has
10 contributed to the direct infringement of the '153 patent by its personnel, contractors,
11 distributors, and customers. The Accused Products have special features that are
12 specially designed to be used in an infringing way and that have no substantial uses
13 other than ones that infringe one or more claims of the '153 patent, including, for
14 example, claim 1 of the '153 patent. The special features constitute a material part
15 of the invention of one or more of the claims of the '153 patent and are not staple
16 articles of commerce suitable for substantial non-infringing use. Defendant's
17 contributory infringement is ongoing.

18 57. Defendant had knowledge of its infringement of the '153 patent at least as
19 of February of 2024.

20 58. Furthermore, on information and belief, Defendant has a policy or practice
21 of not reviewing the patents of others, including instructing its employees to not
22 review the patents of others, and thus has been willfully blind of FCS's patent rights.

23 59. Defendant's actions are at least objectively reckless as to the risk of
24 infringing a valid patent and this objective risk was either known or should have
25 been known by Defendant.

26 60. Defendant's direct infringement of the '153 patent is, has been, and
27 continues to be willful, intentional, deliberate, or in conscious disregard of FCS's
28 rights under the patent.

1 61. FCS or its predecessors-in-interest have satisfied all statutory obligations
2 required to collect pre-filing damages for the full period allowed by law for
3 infringement of the '153 patent.

4 62. FCS has been damaged as a result of the infringing conduct by Defendant
5 alleged above. Thus, Defendant is liable to FCS in an amount that compensates it
6 for such infringements, which by law cannot be less than a reasonable royalty,
7 together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

8 63. FCS has suffered irreparable harm, through its loss of market share and
9 goodwill, for which there is no adequate remedy at law. FCS has and will continue
10 to suffer this harm by virtue of Defendant's infringement of the '153 patent.
11 Defendant's actions have interfered with and will interfere with FCS's ability to
12 license technology. The balance of hardships favors FCS's ability to commercialize
13 its own ideas and technology. The public interest in allowing FCS to enforce its
14 right to exclude outweighs other public interests, which supports injunctive relief in
15 this case.

16 **COUNT V: INFRINGEMENT OF U.S. PATENT NO. 7,656,845**

17 64. FCS repeats and re-alleges the allegations in the Paragraphs above as
18 though fully set forth in their entirety. For purposes of this Count V, the term
19 "Accused Products" means the Sona™ NX611 - WiFi 6 + Bluetooth® 5.3 Module;
20 Sona™ IF573 - WiFi 6E + Bluetooth® 5.4 Module; Sterling™-LWB+ WiFi 4
21 and Bluetooth 5.2 Modules; Sentrius™ MG100 Gateway with LTE-M/NB-IoT and
22 Bluetooth 5; Sentrius IG60-BL654 and IG60-BL654-LTE Wireless IoT Gateway;
23 and Summit SOM 8M Plus System-on-Module - WiFi 5 + Bluetooth 5.3, and any
24 other devices and hardware, software, and functionality that comprise substantially
25 similar functionality.

26 65. The USPTO duly issued U.S. Patent No. 7,656,845 (the "'845 patent") on
27 February 2, 2010 after full and fair examination of Application No. 11/402,172
28 which was filed on April 11, 2006. The '845 patent is entitled "Channel Interference

1 Reduction.” A Certificate of Correction was issued on November 30, 2010.

2 66. FCS owns all substantial rights, interest, and title in and to the ’845 patent,
3 including the sole and exclusive right to prosecute this action and enforce the ’845
4 patent against infringers and to collect damages for all relevant times.

5 67. The claims of the ’845 patent are not directed to an abstract idea and are
6 not limited to well-understood, routine, or conventional activity. Rather, the claimed
7 inventions include inventive components that improve upon the function and
8 operation of preexisting systems and methods of wireless communication with a
9 mobile unit.

10 68. The written description of the ’845 patent describes in technical detail
11 each limitation of the claims, allowing a skilled artisan to understand the scope of
12 the claims and how the non-conventional and non-generic combination of claim
13 limitations is patently distinct from and improved upon what may have been
14 considered conventional or generic in the art at the time of the invention.

15 69. Defendant has directly infringed and continued to directly infringe the
16 claims of the ’845 patent through the end of its term by importing, selling,
17 manufacturing, offering to sell, using, providing, supplying, or distributing the
18 Accused Products. For instance, Defendant has directly infringed and continued to
19 directly infringe, either literally or under the doctrine of equivalents, at least claim 1
20 of the ’845 patent through the end of its term. As just one example of infringement,
21 the Accused Products used by Defendant provide a system comprising a processor,
22 a first transceiver configured to communicate *via* a first medium, a second
23 transceiver configured to communicate *via* a second medium, wherein at least one
24 of the first transceiver and the second transceiver is configured to retry transmission
25 of a packet at a lower rate if a prior transmission of the packet is not acknowledged,
26 an allocation unit configured to dynamically allocate data channels to one of the first
27 medium and the second medium based upon a desired level of service. *See* ’845
28 Evidence of Use Chart attached hereto as **Exhibit E**.

1 70. Defendant has also indirectly infringed and continued to indirectly
2 infringe the '845 patent the end of its term by inducing others to directly infringe the
3 '845 patent. Defendant has induced distributors and end-users, including, but not
4 limited to, Defendant's employees, partners, contractors, or customers, to directly
5 infringe, either literally or under the doctrine of equivalents, the '845 patent by
6 providing or requiring use of the Accused Products. Defendant took active steps,
7 directly or through contractual relationships with others, with the specific intent to
8 cause them to use the Accused Products in a manner that infringes one or more
9 claims of the '845 patent, including, for example, claim 1 of the '845 patent. Such
10 steps by Defendant include, among other things, advising or directing personnel,
11 contractors, or end-users to use the Accused Products in an infringing manner;
12 advertising and promoting the use of the Accused Products in an infringing manner;
13 or distributing instructions that guide users to use the Accused Products in an
14 infringing manner. Defendant performed these steps, which constitute induced
15 infringement with the knowledge of the '845 patent and with the knowledge that the
16 induced acts constitute infringement. Defendant is aware that the normal and
17 customary use of the Accused Products by others would infringe the '845 patent.
18 Defendant's inducement is ongoing.

19 71. Defendant has also indirectly infringed and continued to indirectly
20 infringe by contributing to the infringement of the '845 patent through the end of its
21 term. Defendant has contributed to the direct infringement of the '845 patent by its
22 personnel, contractors, distributors, and customers. The Accused Products have
23 special features that are specially designed to be used in an infringing way and that
24 have no substantial uses other than ones that infringe one or more claims of the '845
25 patent, including, for example, claim 1 of the '845 patent. The special features
26 constitute a material part of the invention of one or more of the claims of the '845
27 patent and are not staple articles of commerce suitable for substantial non-infringing
28 use. Defendant's contributory infringement of the '845 patent was ongoing through

1 the end of its term.

2 72. Defendant had knowledge of its infringement of the '845 patent at least as
3 of February of 2024.

4 73. Furthermore, on information and belief, Defendant has a policy or practice
5 of not reviewing the patents of others, including instructing its employees to not
6 review the patents of others, and thus has been willfully blind of FCS's patent rights.

7 74. Defendant's actions are at least objectively reckless as to the risk of
8 infringing a valid patent and this objective risk was either known or should have
9 been known by Defendant.

10 75. Defendant's direct infringement of the '845 patent is, has been, and
11 continued to be willful, intentional, deliberate, or in conscious disregard of FCS's
12 rights under the patent '845 patent through the end of its term.

13 76. FCS or its predecessors-in-interest have satisfied all statutory obligations
14 required to collect pre-filing damages for the full period allowed by law for
15 infringement of the '845 patent.

16 77. FCS has been damaged as a result of the infringing conduct by Defendant
17 alleged above. Thus, Defendant is liable to FCS in an amount that compensates it
18 for such infringements, which by law cannot be less than a reasonable royalty,
19 together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

20 **COUNT VI: INFRINGEMENT OF U.S. PATENT NO. 7,742,388**

21 78. FCS repeats and re-alleges the allegations in the Paragraphs above as
22 though fully set forth in their entirety. For purposes of this Count VI, the term
23 "Accused Products" means the Sona™ NX611 - WiFi 6 + Bluetooth® 5.3 Module;
24 Sona™ IF573 - WiFi 6E + Bluetooth® 5.4 Module; Sterling™-LWB+ WiFi 4
25 and Bluetooth 5.2 Modules; Sentrius™ MG100 Gateway with LTE-M/NB-IoT and
26 Bluetooth 5; Sentrius IG60-BL654 and IG60-BL654-LTE Wireless IoT Gateway;
27 Summit SOM 8M Plus System-on-Module - WiFi 5 + Bluetooth 5.3; FlexMIMO /
28 FlexMIMO 6E MIMO Internal Antenna; and Revie Flex Series Cellular Antennas,

1 and any other devices and hardware, software, and functionality that comprise
2 substantially similar functionality

3 79. The USPTO duly issued U.S. Patent No. 7,742,388 (the “’388 patent”) on
4 June 22, 2010, after full and fair examination of Application No. 11/185,665 which
5 was filed July 20, 2005. The ’388 patent is entitled “Packet Generation Systems and
6 Methods.”

7 80. FCS owns all substantial rights, interest, and title in and to the ’388 patent,
8 including the sole and exclusive right to prosecute this action and enforce the ’388
9 patent against infringers and to collect damages for all relevant times.

10 81. The claims of the ’388 patent are not directed to an abstract idea and are
11 not limited to well-understood, routine, or conventional activity. Rather, the claimed
12 inventions include inventive components that improve upon the function and
13 operation of preexisting systems and methods of generating packets in a digital
14 communications system.

15 82. The written description of the ’388 patent describes in technical detail
16 each limitation of the claims, allowing a skilled artisan to understand the scope of
17 the claims and how the non-conventional and non-generic combination of claim
18 limitations is patently distinct from and improved upon what may have been
19 considered conventional or generic in the art at the time of the invention.

20 83. FCS or its predecessors-in-interest have satisfied all statutory obligations
21 required to collect pre-filing damages for the full period allowed by law for
22 infringement of the ’388 patent.

23 84. Defendant has directly infringed and continues to directly infringe the
24 claims of the ’388 patent by manufacturing, providing, supplying, using,
25 distributing, selling, or offering to sell the Accused Products. For instance,
26 Defendant has directly infringed and continues to directly infringe, either literally or
27 under the doctrine of equivalents, at least claim 1 of the ’388 patent. As just one
28 example of infringement, Defendant performs a method including generating a

1 packet with a size corresponding to a protocol used for a network transmission,
2 wherein the packet comprises a preamble having a first training symbol and a second
3 training symbol. The method further includes increasing the size of the packet by
4 adding subcarriers to the second training symbol of the packet to produce an
5 extended packet, wherein a quantity of subcarriers of the second training symbol is
6 greater than a quantity of subcarriers of the first training symbol; and transmitting
7 the extended packet from an antenna. *See* '388 Evidence of Use Charts attached
8 hereto as **Exhibit F**.

9 85. Defendant has indirectly infringed and continues to indirectly infringe the
10 '388 patent by inducing others to directly infringe the '388 patent. Defendant has
11 induced and continue to induce customers and end-users, including, but not limited
12 to, Defendant's customers, employees, partners, or contractors, to directly infringe,
13 either literally or under the doctrine of equivalents, the '388 patent by providing or
14 requiring use of the Accused Products. Defendant has taken active steps, directly or
15 through contractual relationships with others, with the specific intent to cause them
16 to use the Accused Products in a manner that infringes one or more claims of the
17 '388 patent, including, for example, claim 1. Such steps by Defendant has included,
18 among other things, advising or directing customers, personnel, contractors, or end-
19 users to use the Accused Products in an infringing manner; advertising and
20 promoting the use of the Accused Products in an infringing manner; or distributing
21 instructions that guide users to use the Accused Products in an infringing manner.
22 Defendant has been performing these steps, which constitute induced infringement
23 with the knowledge of the '388 patent and with the knowledge that the induced acts
24 constitute infringement. Defendant has been aware that the normal and customary
25 use of the Accused Products by others would infringe the '388 patent. Defendant's
26 inducement is ongoing.

27 86. Defendant has indirectly infringed and continues to indirectly infringe by
28 contributing to the infringement of the '388 patent. Defendant has contributed and

1 continues to contribute to the direct infringement of the '388 patent by its customers,
2 personnel, and contractors. The Accused Products have special features that are
3 specially designed to be used in an infringing way and that have no substantial uses
4 other than ones that infringe one or more claims of the '388 patent, including, for
5 example, claim 1. The special features constitute a material part of the invention of
6 one or more of the claims of the '388 patent and are not staple articles of commerce
7 suitable for substantial non-infringing use. Defendant's contributory infringement
8 is ongoing.

9 87. Defendant had knowledge of its infringement of the '388 patent at least as
10 of February of 2024.

11 88. Furthermore, on information and belief, Defendant has a policy or practice
12 of not reviewing the patents of others, including instructing its employees to not
13 review the patents of others, and thus have been willfully blind of FCS's patent
14 rights.

15 89. Defendant's actions are at least objectively reckless as to the risk of
16 infringing a valid patent and this objective risk was either known or should have
17 been known by Defendant.

18 90. Defendant's infringement of the '388 patent is, has been, and continues to
19 be willful, intentional, deliberate, or in conscious disregard of FCS's rights under
20 the patent.

21 91. FCS has been damaged as a result of the infringing conduct by Defendant
22 alleged above. Thus, Defendant is liable to FCS in an amount that compensates it
23 for such infringements, which by law cannot be less than a reasonable royalty,
24 together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

25 92. FCS has suffered irreparable harm, through its loss of market share and
26 goodwill, for which there is no adequate remedy at law. FCS has and will continue
27 to suffer this harm by virtue of Defendant's infringement of the '388 patent.
28 Defendant's actions have interfered with and will interfere with FCS's ability to

1 license technology. The balance of hardships favors FCS's ability to commercialize
2 its own ideas and technology. The public interest in allowing FCS to enforce its
3 right to exclude outweighs other public interests, which supports injunctive relief in
4 this case.

5 **COUNT VII: INFRINGEMENT OF U.S. PATENT NO. 8,005,053**

6 93. FCS repeats and re-alleges the allegations in the Paragraphs above as
7 though fully set forth in their entirety. For purposes of this Count VII, the term
8 "Accused Products" means the Sona™ NX611 - WiFi 6 + Bluetooth® 5.3 Module;
9 Sona™ IF573 - WiFi 6E + Bluetooth® 5.4 Module; Sterling™-LWB+ WiFi 4
10 and Bluetooth 5.2 Modules; Sentrius™ MG100 Gateway with LTE-M/NB-IoT and
11 Bluetooth 5; Sentrius IG60-BL654 and IG60-BL654-LTE Wireless IoT Gateway;
12 and Summit SOM 8M Plus System-on-Module - WiFi 5 + Bluetooth 5.3, and any
13 other devices and hardware, software, and functionality that comprise substantially
14 similar functionality.

15 94. The USPTO duly issued U.S. Patent No. 8,005,053 (the "'053 patent") on
16 August 23, 2011, after full and fair examination of Application No. 12/696,760,
17 which was filed on January 29, 2010. The '053 patent is entitled "Channel
18 Interference Reduction."

19 95. FCS owns all substantial rights, interest, and title in and to the '053 patent,
20 including the sole and exclusive right to prosecute this action and enforce the '053
21 patent against infringers and to collect damages for all relevant times.

22 96. The claims of the '053 patent are not directed to an abstract idea and are
23 not limited to well-understood, routine, or conventional activity. Rather, the claimed
24 inventions include inventive components that improve upon the function and
25 operation of voice and data communications systems.

26 97. The written description of the '053 patent describes in technical detail
27 each limitation of the claims, allowing a skilled artisan to understand the scope of
28 the claims and how the non-conventional and non-generic combination of claim

1 limitations is patently distinct from and improved upon what may have been
2 considered conventional or generic in the art at the time of the invention.

3 98. Defendant has directly infringed the claims of the '053 patent by
4 importing, selling, manufacturing, offering to sell, using, providing, supplying, or
5 distributing the Accused Products. For instance, Defendant has directly infringed,
6 either literally or under the doctrine of equivalents, at least claim 1 of the '053 patent.
7 As just one example of infringement, Defendant performs a method comprising a
8 communication device storing data encoded for a plurality of different wireless
9 protocols, the communication device including a plurality of wireless transceivers,
10 each of which is configured to transmit data according to a corresponding one of the
11 plurality of different wireless protocols where the communication device selects one
12 of the plurality of different wireless protocols and encodes data of an unselected one
13 of the plurality of different wireless protocols into the selected wireless protocol, and
14 transmits the encoded data using the one of the plurality of wireless transceivers
15 corresponding to the selected wireless protocol. *See* '053 Evidence of Use Charts
16 attached hereto as **Exhibit G**.

17 99. FCS or its predecessors-in-interest have satisfied all statutory obligations
18 required to collect pre-filing damages for the full period allowed by law for
19 infringement of the '053 patent.

20 100. FCS has been damaged as a result of the infringing conduct by Defendant
21 alleged above. Thus, Defendant is liable to FCS in an amount that compensates it
22 for such infringements, which by law cannot be less than a reasonable royalty,
23 together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

24 **JURY DEMAND**

25 101. FCS hereby requests a trial by jury on all issues so triable by right.

26 **PRAYER FOR RELIEF**

27 102. FCS requests that the Court find in its favor and against Defendant, and
28 that the Court grant FCS the following relief:

- 1 a. Judgment that one or more claims of each of the Asserted Patents has been
2 infringed, either literally or under the doctrine of equivalents, by
3 Defendant or others acting in concert therewith;
- 4 b. A permanent injunction enjoining Defendant and its officers, directors,
5 agents, servants, affiliates, employees, divisions, branches, subsidiaries,
6 parents, and all others acting in concert therewith from infringement of
7 the '388 patent; or, in the alternative, an award of a reasonable ongoing
8 royalty for future infringement of the Asserted Patents by such entities;
- 9 c. Judgment that Defendant account for and pay to FCS all damages to and
10 costs incurred by FCS because of Defendant's infringing activities and
11 other conduct complained of herein;
- 12 d. Judgment that Defendant's infringements of the '040 patent, the '153
13 patent, the '845 patent, and the '388 patent during their lifetimes be found
14 willful, and that the Court award treble damages for the period of such
15 willful infringement pursuant to 35 U.S.C. § 284;
- 16 e. Pre-judgment and post-judgment interest on the damages caused by
17 Defendant's infringing activities and other conduct complained of herein;
- 18 f. That this Court declare this an exceptional case and award FCS its
19 reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285;
20 and
- 21 g. All other and further relief as the Court may deem just and proper under
22 the circumstances.

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1 Dated: January 13, 2025

Respectfully submitted,

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Attorneys for Plaintiff FLEET CONNECT SOLUTIONS LLC

7 **List of Exhibits**

- 8 A. Evidence of Use Chart – U.S. Patent 6,549,583
9 B. Evidence of Use Chart – U.S. Patent 6,633,616
10 C. Evidence of Use Chart – U.S. Patent 7,058,040
11 D. Evidence of Use Chart – U.S. Patent 7,260,153
12 E. Evidence of Use Chart – U.S. Patent 7,656,845
13 F. Evidence of Use Chart – U.S. Patent 7,742,388
14 G. Evidence of Use Chart – U.S. Patent 8,005,053

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