

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NORTHSTAR SYSTEMS LLC,)	Case No.
)	
Plaintiff,)	<u>JURY TRIAL DEMANDED</u>
)	
v.)	
)	
HP INC.,)	
)	
Defendant.)	
)	
)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff NorthStar Systems LLC (“NorthStar” or “Plaintiff”) for its Complaint against Defendant HP Inc. (“HP” or “Defendant”) alleges as follows:

THE PARTIES

1. NorthStar is a limited liability company organized and existing under the laws of the State of Texas, with its principal place of business located at 104 E. Houston Street, Marshall, Texas 75670.

2. Upon information and belief, Defendant HP is a corporation organized and existing under the laws of Delaware, with a regular and established place of business in this judicial district, located 6901 Windcrest Dr., Plano, TX 75024 and 7000 Parkwood Boulevard, Plano, Texas 75024. Upon information and belief, HP does business in Texas and in the Eastern District of Texas, directly or through intermediaries.

JURISDICTION

3. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant. Defendant regularly conducts business and has committed acts of patent infringement and/or has induced acts of patent infringement by others in this Judicial District and/or has contributed to patent infringement by others in this Judicial District, the State of Texas, and elsewhere in the United States.

5. Venue is proper in this Judicial District as to Defendant pursuant to 28 U.S.C. §§ 1391 and 1400(b). Defendant has a regular and established place of business in this Judicial District and is deemed to reside in this Judicial District. Defendant has committed acts of infringement in this Judicial District, and/or has purposely transacted business involving the accused devices in this Judicial District including providing sales and technical support for the products accused of infringement herein.

6. Defendant is subject to this Court's jurisdiction pursuant to due process and/or the Texas Long Arm Statute due at least to its substantial business in this State and Judicial District, including (a) at least part of its past infringing activities, (b) regularly doing or soliciting business in Texas, and/or (c) engaging in persistent conduct and/or deriving substantial revenue from goods and services provided to customers in Texas.

PATENTS-IN-SUIT

7. On August 12, 2014, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,805,416 (the "'416 Patent") entitled "Method and System for Mobile Device Selectively Reporting of GPS Position Information to Others." A true and correct copy of the '416 Patent is available at <http://pdfpiw.uspto.gov/.piw?docid=8805416>.

8. On February 7, 2006, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 6,995,708 (the “’708 Patent”) entitled “Local Positioning System.” A true and correct copy of the ’708 Patent is available at <http://pdfpiw.uspto.gov/.piw?docid=6995708>.

9. On September 6, 2011, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,014,943 (the “’943 Patent”) entitled “Method and System for Displaying Social Networking Navigation Information.” A true and correct copy of the ’943 Patent is available at <http://pdfpiw.uspto.gov/.piw?docid=8014943>.

10. On October 4, 2011, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,032,297 (the “’297 Patent”) entitled “Method and System for Displaying Navigation Information on an Electronic Map.” A true and correct copy of the ’297 Patent is available at <http://pdfpiw.uspto.gov/.piw?docid=8032297>.

11. On August 5, 2003, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 6,603,977 (the “’977 Patent”) entitled “Location Information System for a Wireless Communication Device and Method Therefor”. A true and correct copy of the ’977 Patent is available at <http://pdfpiw.uspto.gov/.piw?docid=6603977>.

12. On September 6, 2011, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,014,797 (the “’797 Patent”) entitled “Location Information System for a Wireless Communication Device and Method Thereof”. A true and correct copy of the ’797 Patent is available at <http://pdfpiw.uspto.gov/.piw?docid=8014797>.

13. On October 20, 2009, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,606,555 (the “’555 Patent”) entitled “Location Information

System for a Wireless Communication Device and Method Thereof”. A true and correct copy of the ’977 Patent is available at <http://pdfpiw.uspto.gov/.piw?docid=7606555>.

14. NorthStar is the sole and exclusive owner of all right, title, and interest in the ’416 Patent, the ’708 Patent, the ’943 Patent, the ’297 Patent, the ’977 Patent, the ’797 Patent, and the ’555 Patent (the “Patents-in-Suit”) and holds the exclusive right to take all actions necessary to enforce its rights to the Patent-in-Suit, including the filing of this patent infringement lawsuit. NorthStar also has the right to recover all damages for past, present, and future infringement of the Patent-in-Suit and to seek injunctive relief as appropriate under the law.

FACTUAL ALLEGATIONS

15. The ’416 Patent generally discloses a method for a mobile device to communicate with a remote source over a wireless network in the presence of GPS signal interference. The technology described in the ’416 Patent was developed by Scott C. Harris. By way of example, this technology is implemented today in devices that communicate wirelessly with a remote source to obtain location information.

16. The ’708 Patent generally discloses a method for determining the position of a device by determining using earth-based positioning instead of satellite-based positioning when available. The technology described in the ’708 Patent was developed by Dominik J. Schmidt of Gallitzin Allegheny LLC. By way of example, this technology is implemented today in handheld devices that determine whether earth-based media are available and using the earth-based media for location information instead of a satellite-based media.

17. The ’943 and ’297 Patents generally disclose methods for the displaying and generating object vector indicators referenced on an electronic map. The technology described in the ’943 and ’297 Patents was developed by Gabriel Jakobson. By way of example, this

technology is implemented today in handheld devices that generate electronic maps based on received user input which display object vector indicators.

18. The '977 Patent, the '797 Patent, and the '555 Patent generally disclose systems and methods for location information using wireless communication. The technology described in the '977 Patent, the '797, and the '555 Patent was developed by Patrick J. Walsh and Kevin Daniel Kaschke. By way of example, this technology is implemented in the HP Engage Edge system, among other products.

19. HP offers Mobile Broadband as an optional feature on select HP Notebooks, Ultrabooks, and tablets.¹ HP Mobile Broadband Modules include at least the HP XMM 7360 LTE-Advance WWAN, which includes GPS and A-GPS functionality.

QuickSpecs		HP Mobile Broadband Modules
Technical Specifications		
HP XMM™ 7360 LTE-Advance WWAN		
Technology/Operating bands	LTE: 2100 (Band 1), 1900 (Band 2), 1800 (Band 3), 1700/2100 (Band 4), 850 (Band 5), 2600 (Band 7), 900 (Band 8), 700 (Band 12 lower), 700 (Band 13 upper), 700 (Band 17 lower), 800 (Band 20), 700 (Band 28). HSPA+: 2100 (Band 1), 1900 (Band 2), 1700/2100 (Band 4), 850 (Band 5), 900 (Band 8) MHz	
Wireless protocol standards	3GPP Release 10 LTE Specification CAT.4, 20MHz BW WCDMA R99, 3GPP Release 5, 6, 7 and 8 UMTS Specification 1xEVDO Release 0, A and B. E-GPRS: Class B, Multi-slot class 12, coding schemes CS1 - CS4 and MSC1 - MSC9	
GPS	Standalone, A-GPS (MS-A, MS-B and XTRA)	
GPS bands	1575.42 MHz ± 1.023 MHz, GLONASS 1596-1607MHz	

20. HP has infringed and/or is continuing to infringe the Patents-in-Suit by making, using, offering to sell, selling, and/or importing laptops and tablets which utilize the accused functionality, including but not limited to the HP Engage Edge Point of Sale System and other

¹ “HP Mobile Broadband Modules”
<https://www8.hp.com/h20195/v2/getpdf.aspx/c04123334.pdf>.

² *Id.*

edge compute devices and HP Engage Devices, laptop computers, including but not limited to the HP ZBook, HP EliteBook, HP Healthcare Edition, HP ProBook, HP Pavilion, HP Spectre, HP Envy, HP Chromebook, HP Victus, and HP Omen laptop series computers, as well as HP tablets and Notebooks, including but not limited to the HP 7, 8, and 10 tablets as well as “2-in-1” Notebook PCs including but not limited to the HP Elite Folio, and HP phones that infringes the Patents-in-Suit.

COUNT I
(Infringement of the '416 Patent)

21. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

22. NorthStar has not licensed or otherwise authorized HP to make, use, offer for sale, sell, or import any products that embody the inventions of the '416 Patent.

23. HP has and continues to directly infringe the '416 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '416 Patent. Such products include, but are not limited to, laptops and computer tablets, and phones, among other products.

24. For example, HP has and continues to directly infringe at least claim 1 of the '416 Patent by making, using, offering to sell, selling, and/or importing into the United States HP laptops, tablets and phones that utilize GPS/A-GPS, detect signal interference, and receive navigation information.

25. For example, the HP Elite Folio, upon information and belief, utilizes a method for receiving information about current a current location of a mobile communication device, wherein the information about the current location includes global position system (GPS) information:

GPS	Standalone, A-GPS (MS-B and LTO)
GPS bands	GPS 1575.42 MHz \pm 1.023 MHz, GLONASS 1596-1607MHz, Beidou 1561.098 \pm 2.046 MHz

3

The HP Elite Folio performs the step of detecting by the mobile communication device, signal interference. The HP Elite Folio performs the step of generating, by the mobile communication device, an indication of the signal interference, communication, by the mobile communication device, with a remote source over a wireless network, wherein said communication comprises sending both the indication of the signal interference and the GPS information from the mobile communication device to the remote source. The HP Elite Folio performs the step of receiving, by the mobile communication device navigation information from the remote source in response to sending both the indication of the signal interference and the GPS information, wherein the navigation information comprises data for plotting a course on a map including the current location of the mobile communication device. The HP Elite Folio performs the step of displaying by the mobile communication device, the map based on the navigation information.

26. HP, with knowledge that these products, or the use thereof, infringes the '416 Patent at least as of the date of this Complaint, knowingly and intentionally induced, and continues to knowingly and intentionally induce, direct infringement of the '416 Patent by providing these products to end users for use in an infringing manner.

27. HP induced infringement by others, including end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end users, infringe the '416 Patent, but while remaining willfully blind to the infringement.

 3

https://h20195.www2.hp.com/v2/GetDocument.aspx?docname=c06989947&doctype=quickspecs&doclang=EN_US&searchquery=&cc=by&lc=ru

28. NorthStar has suffered damages as a result of HP's direct and indirect infringement of the '416 Patent in an amount to be proved at trial.

29. NorthStar has suffered, and will continue to suffer, irreparable harm as a result of HP's infringement of the '416 Patent, for which there is no adequate remedy at law, unless HP's infringement is enjoined by this Court.

COUNT II
(Infringement of the '708 Patent)

30. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

31. NorthStar has not licensed or otherwise authorized HP to make, use, offer for sale, sell, or import any products that embody the inventions of the '708 Patent.

32. HP has and continues to directly infringe the '708 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '708 Patent. Such products include, but are not limited to, laptops and computer tablets, and phones, among other products.

33. For example, HP has and continues to directly infringe at least claim 1 of the '708 Patent by making, using, offering to sell, selling, and/or importing into the United States HP laptops, tablets and phones that utilize GPS/A-GPS.

34. For example, the HP Elite Folio performs a method to determine position of a user comprising sniffing for one or more earth-based media with a mobile device.

GPS	Standalone, A-GPS (MS-B and LTO)
GPS bands	GPS 1575.42 MHz \pm 1.023 MHz, GLONASS 1596-1607MHz, Beidou 1561.098 \pm 2.046 MHz

⁴ *Id.*

Upon information and belief, if the one or more earth-based media is present, the HP Elite Folio performs the step of using an earth-based positioning system receiving of the mobile device selected from one of a short-range wireless receiver of the mobile device and a cellular receiver of the mobile device to determine the position, otherwise using a satellite-based positioning system receiver of the mobile device to determine the position only if the one or more earth-based media are not present, using code of the mobile device to fix the mobile device to favor use of the earth based positioning system receiver over the satellite-based positioning system receiver.

35. HP, with knowledge that these products, or the use thereof, infringes the '708 Patent at least as of the date of this Complaint, knowingly and intentionally induced, and continues to knowingly and intentionally induce, direct infringement of the '708 Patent by providing these products to end users for use in an infringing manner.

36. HP induced infringement by others, including end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end users, infringe the '708 Patent, but while remaining willfully blind to the infringement.

37. NorthStar has suffered damages as a result of HP's direct and indirect infringement of the '708 Patent in an amount to be proved at trial.

38. NorthStar has suffered, and will continue to suffer, irreparable harm as a result of HP's infringement of the '708 Patent, for which there is no adequate remedy at law, unless HP's infringement is enjoined by this Court.

COUNT III
(Infringement of the '943 Patent)

39. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

40. NorthStar has not licensed or otherwise authorized HP to make, use, offer for sale, sell, or import any products that embody the inventions of the '943 Patent.

41. HP has and continues to directly infringe the '943 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '943 Patent. Such products include, but are not limited to, laptops and computer tablets, and phones, among other products.

42. For example, HP has and continues to directly infringe at least claim 1 of the '943 Patent by making, using, offering to sell, selling, and/or importing into the United States products that include laptops and computer tablets, and phones that display object vector indicators referencing social-network map-objects on an electronic map.

43. For example, the HP Elite Folio performs a method for displaying object vector indicators referencing social-network map-objects on an electronic map. The HP Elite Portfolio performs the step of providing an electronic device having a map-display application that is coupled to a mapping service, a social-network and a display for displaying a selected area of the electronic map. The HP Elite Portfolio performs the step of authenticating to the social network. The HP Elite Portfolio performs the step of obtaining from the social network the map-object. The HP Elite Portfolio performs the step of determining that coordinates of the map-object are not within the selected area of the electronic map. The HP Elite Portfolio performs the step of computing distance and travel-related information from a location within the selected area of the electronic map to the map-object. The HP Elite Portfolio performs the step of computing a placement position of an object vector indicators referencing the map-object on the map-display application. The HP Elite Portfolio performs the step of creating the object vector indicators

containing the distance and travel-related information. The HP Elite Portfolio performs the step of displaying the object vector indicators on the display at the computed placement position. The HP Elite Portfolio performs the step of receiving user input selecting the object vector indicators. The HP Elite Portfolio performs the step of displaying a secondary area of the electronic map, wherein the secondary area is a region of the electronic map centered approximately around the map-object. The HP Elite Portfolio performs the step of displaying the map-object approximately at the center of the secondary area.

44. HP, with knowledge that these products, or the use thereof, infringes the '943 Patent at least as of the date of this Complaint, knowingly and intentionally induced, and continues to knowingly and intentionally induce, direct infringement of the '943 Patent by providing these products to end users for use in an infringing manner.

45. HP induced infringement by others, including end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end users, infringe the '943 Patent, but while remaining willfully blind to the infringement.

46. NorthStar has suffered damages as a result of HP's direct and indirect infringement of the '943 Patent in an amount to be proved at trial.

47. NorthStar has suffered, and will continue to suffer, irreparable harm as a result of HP's infringement of the '943 Patent, for which there is no adequate remedy at law, unless HP's infringement is enjoined by this Court.

COUNT IV
(Infringement of the '297 Patent)

48. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

49. NorthStar has not licensed or otherwise authorized HP to make, use, offer for sale, sell, or import any products that embody the inventions of the '297 Patent.

50. HP has and continues to directly infringe the '297 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '297 Patent. Such products include, but are not limited to, laptops and computer tablets, and phones, among other products.

51. For example, HP has and continues to directly infringe at least claim 1 of the '297 Patent by making, using, offering to sell, selling, and/or importing into the United States products that include laptops and computer tablets, and phones that display object vector indicators referencing map-objects on an electronic map.

52. For example, the HP Elite Folio, performs a method for displaying object vector indicators referencing map-objects on an electronic map, comprising: providing an electronic device having a map-display application that is coupled to a mapping service and a display for displaying a selected area of the electronic map. The HP Elite Folio performs the step of determining that coordinates of the map-objects are not within the selected area of the electronic map. The HP Elite Folio performs the step of computing distance and travel-related information from a location within the selected area of the electronic map to the map-objects. The HP Elite Folio performs the step of computing a placement position of an object vector indicators referencing the map-objects on the map-display application. The HP Elite Folio performs the step of creating the object vector indicators containing the distance and travel-related information. The HP Elite Folio performs the step of displaying the object vector indicators on the display at the computed placement position. The HP Elite Folio performs the step of receiving user input

selecting the object vector indicators. The HP Elite Folio performs the step of displaying a secondary area of the electronic map, wherein the secondary area is a region of the electronic map centered approximately around the map-objects. The HP Elite Folio performs the step of displaying the map-objects approximately at the center of the secondary area.

53. HP, with knowledge that these products, or the use thereof, infringes the '297 Patent at least as of the date of this Complaint, knowingly and intentionally induced, and continues to knowingly and intentionally induce, direct infringement of the '297 Patent by providing these products to end users for use in an infringing manner.

54. HP induced infringement by others, including end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end users, infringe the '297 Patent, but while remaining willfully blind to the infringement.

55. NorthStar has suffered damages as a result of HP's direct and indirect infringement of the '297 Patent in an amount to be proved at trial.

56. NorthStar has suffered, and will continue to suffer, irreparable harm as a result of HP's infringement of the '297 Patent, for which there is no adequate remedy at law, unless HP's infringement is enjoined by this Court.

COUNT V
(Infringement of the '977 Patent)

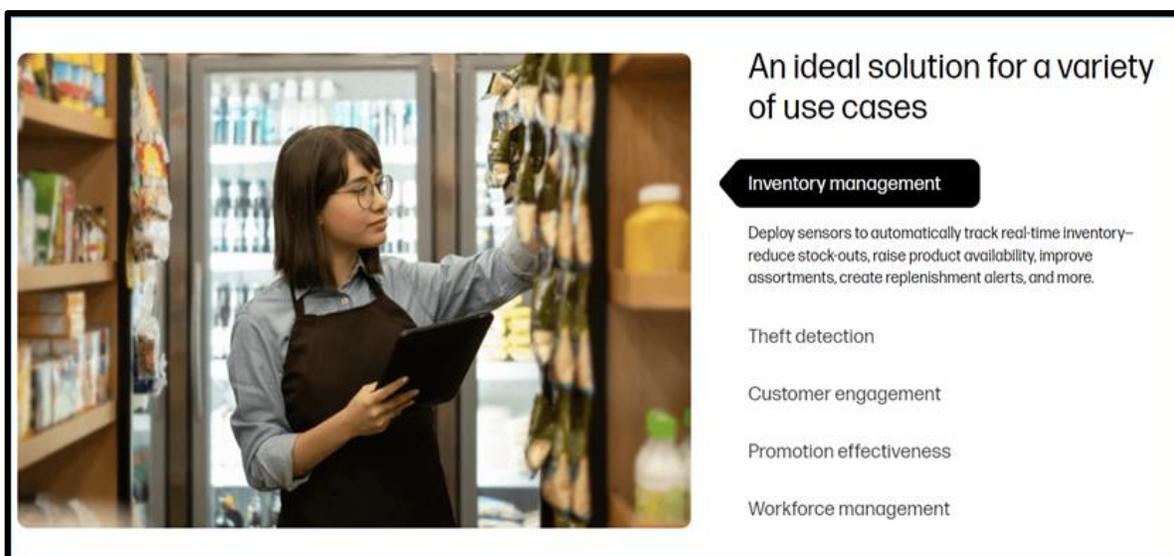
57. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

58. NorthStar has not licensed or otherwise authorized Defendants to make, use, offer for sale, sell, or import any products that embody the inventions of the '977 Patent.

59. Defendant directly infringed the '977 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering

to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '977 Patent. Such products include but are not limited to the HP Engage Edge system.

60. For example, HP has infringed at least claim 1 of the '977 Patent by making, using, offering to sell, selling, and/or importing into the United States products that track assets in factories and throughout supply chains, such as the HP Engage Edge system, among other products:



An ideal solution for a variety of use cases

- Inventory management
 - Deploy sensors to automatically track real-time inventory—reduce stock-outs, raise product availability, improve assortments, create replenishment alerts, and more.
- Theft detection
- Customer engagement
- Promotion effectiveness
- Workforce management

Focused on Helping the ISV/Developer Ecosystem in Retail/Hospitality

HP Engage Edge offers a variety of hardware compute options from HP's world class Retail hardware portfolio. The product utilizes HP's MP9 system based on 8th Generation Intel® Core™ Desktop Processor Family; Powered by EdgeX Foundry open-framework to help cutting time-to-market development by quickly and seamlessly integrating compatible sensors and cloud engines. HP Engage Edge can power dozens of other use cases like Inventory Management, Shelf replenishment, Loss prevention, Workforce management, Customer Engagement etc. Depending on the problem statement at hand, different sensors can be integrated into the product to assess and manage a variety of business metrics. For example, adding an RFID stream could help manage inventory and in-store tracking. In other cases, cameras can be deployed for computer-vision based analytics for customer engagement.

For example, upon information and belief, the HP Engage Edge system is a location information system which performs a method of receiving information representing a plurality of location

⁵ <https://www.hp.com/us-en/solutions/pos-systems/engage-edge.html>.

⁶ <https://press.hp.com/us/en/blogs/2020/hp-unveils-hp-engage-edge.html>.

descriptions respectively associated with a plurality of predetermined areas in a facility. The HP Engage Edge system performs the step of sending the location information to a wireless communication device present in one of the plurality of predetermined areas in the facility over a short-range wireless communication channel responsive to the step of receiving. The HP Engage Edge system performs the step of determining whether a request is received from the wireless communication device for the location information over the short-range wireless communication channel responsive to the step of receiving, wherein the step of determining is repeated when a request is not received from the wireless communication device and when the location information is fixed, and wherein the step of receiving the location information is repeated when a request is not received from the wireless communication device and when the location information is variable.

61. Defendant has indirectly infringed one or more claims of the '977 Patent by knowingly and intentionally inducing others, including HP customers and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States products that include infringing technology.

62. Defendant, with knowledge⁷ that these products, or the use thereof, infringed the '977 Patent, knowingly and intentionally induced direct infringement of the '977 Patent by providing these products to end-users for use in an infringing manner.

63. Defendants induced infringement by others, including end-users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end-users, infringe the '977 Patent.

⁷ HP cited the '977 Patent family in HP's own U.S. Patent No. 7,477,903, which was issued on January 13, 2009.

64. NorthStar has suffered damages as a result of Defendants' indirect infringement of the '977 Patent in an amount to be proved at trial.

COUNT VI
(Infringement of the '797 Patent)

65. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

66. NorthStar has not licensed or otherwise authorized Defendants to make, use, offer for sale, sell, or import any products that embody the inventions of the '797 Patent.

67. Defendant directly infringed the '797 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '797 Patent. Such products include but are not limited to the HP Engage Edge system.

68. For example, HP has infringed at least claim 1 of the '797 Patent by making, using, offering to sell, selling, and/or importing into the United States products that track assets in factories and throughout supply chains, such as the HP Engage Edge system, among other products.

69. For example, the HP Engage Edge system is a location information system which uses a computer-implemented method system. The HP Engage System performs the step of sending, at a processor of the location information system, location information over a short-range wireless communication channel to a wireless communication device present in a predetermined area in a facility, the location information informing the wireless communication device of a location of the wireless communication device in the facility; wherein, upon information and belief, the location information is sent to the wireless communication device from a location in the facility other than the location of the wireless communication device in the facility.

70. Defendant has indirectly infringed one or more claims of the '797 Patent by knowingly and intentionally inducing others, including HP customers and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States products that include infringing technology.

71. Defendant, with knowledge⁸ that these products, or the use thereof, infringed the '797 Patent, knowingly and intentionally induced direct infringement of the '797 Patent by providing these products to end-users for use in an infringing manner.

72. Defendant induced infringement by others, including end-users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end-users, infringe the '797 Patent.

73. NorthStar has suffered damages as a result of Defendant's indirect infringement of the '797 Patent in an amount to be proved at trial.

COUNT VII
(Infringement of the '555 Patent)

74. Paragraphs 1 through 20 are incorporated by reference as if fully set forth herein.

75. NorthStar has not licensed or otherwise authorized Defendants to make, use, offer for sale, sell, or import any products that embody the inventions of the '555 Patent.

76. Defendant directly infringed the '555 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every

⁸ HP cited to the '797 Patent family in HP's own foreign patent application GB0011643D0, which was published on July 5, 2000.

limitation of one or more claims of the '555 Patent. Such products include but are not limited to the HP Engage Edge system.

77. For example, HP has infringed at least claim 1 of the '555 Patent by making, using, offering to sell, selling, and/or importing into the United States products that track assets in factories and throughout supply chains, such as the HP Engage Edge system, among other products.

78. For example, the HP Engage Edge system is a location information system that performs the step of receiving location information representing a plurality of location descriptions respectively associated with a plurality of predetermined areas in a facility. The HP Engage Edge system performs the step of sending the location information to a wireless communication device present in one of the plurality of predetermined areas in the facility over a short-range wireless communication channel responsive to the step of receiving, the location information informing the wireless communication device a location of the wireless communication device in the facility; wherein the location information is sent to the wireless communication device from a location in the facility other than the location of the wireless communication device in the facility.

79. Defendant has indirectly infringed one or more claims of the '555 Patent by knowingly and intentionally inducing others, including HP customers and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States products that include infringing technology.

80. Defendant, with knowledge⁹ that these products, or the use thereof, infringed the '555 Patent, knowingly and intentionally induced direct infringement of the '555 Patent by

⁹ HP cited to the '555 Patent family in HP's own foreign patent application GB0011643D0, which was published on July 5, 2000.

providing these products to end-users for use in an infringing manner.

81. Defendant induced infringement by others, including end-users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end-users, infringe the '555 Patent.

82. NorthStar has suffered damages as a result of Defendant's indirect infringement of the '555 Patent in an amount to be proved at trial.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury for all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, NorthStar prays for relief against Defendant as follows:

- a. Entry of judgment declaring that Defendant has directly and/or indirectly infringed one or more claims of the Patents-in-Suit;
- b. An order pursuant to 35 U.S.C. § 283 permanently enjoining Defendant, its officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them, from further acts of infringement of one or more of the Patents-in-Suit;
- c. An order awarding damages sufficient to compensate NorthStar for Defendant's infringement of the Patents-in-Suit, but in no event less than a reasonable royalty, together with interest and costs;
- d. Entry of judgment declaring that this case is exceptional and awarding NorthStar its costs and reasonable attorney fees under 35 U.S.C. § 285; and,
- e. Such other and further relief as the Court deems just and proper.

Dated: July 15, 2022

Respectfully submitted,

/s/ Vincent J. Rubino, III
Alfred R. Fabricant

NY Bar No. 2219392
Email: ffabricant@fabricantllp.com

Peter Lambrianakos
NY Bar No. 2894392
Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III
NY Bar No. 4557435
Email: vrubino@fabricantllp.com

FABRICANT LLP
411 Theodore Fremd Road, Suite 206 South
Rye, NY 10580
Telephone: (212) 257-5797
Facsimile: (212) 257-5796

John Andrew Rubino
NY Bar No. 5020797
Email: jarubino@rubinoip.com
Michael Mondelli III
NY Bar No. 5805114
Email: mmondelli@rubinoip.com

RUBINO IP
51 J.K.F. Parkway
Short Hills, NJ, 07078
Telephone: (973) 535-0920
Facsimile: (973) 535-0921

Justin Kurt Truelove
Texas Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

**ATTORNEYS FOR PLAINTIFF,
NORTHSTAR SYSTEMS LLC**