

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RIDESHARE DISPLAYS, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-cv-01629-RGA
)	JURY TRIAL DEMANDED
)	
)	
LYFT, INC.,)	
)	
Defendant.)	
_____)	

AMENDED COMPLAINT FOR PATENT INFRINGEMENT

1. Plaintiff, RideShare Displays, Inc., files this Amended Complaint for Patent Infringement and Demand for a Jury Trial against Defendant Lyft, Inc., and alleges as follows:

THE PARTIES

2. Plaintiff, RideShare Displays, Inc. (“RSDI”) is a Delaware Corporation with its principal place of business at 19 Gardner Road, Fairfield, New Jersey, 07004 USA.

3. Defendant, Lyft, Inc. (“Lyft”) is a Delaware Corporation with its principal place of business at 185 Berry Street, Suite 5000 San Francisco, California, 94107 USA.

JURISDICTION AND VENUE

4. This action arises under the Patent Act, 35 U.S.C. 101, et seq. This Court has subject matter jurisdiction over this controversy under 28 U.S.C. 1331 and 1338.

5. This Court has personal jurisdiction over Defendant Lyft, Inc., because Lyft is a Delaware Corporation and because Lyft, Inc. has regularly and systematically transacted

business in this judicial district, directly or through intermediaries, and/or committed acts of infringement in this judicial district.

6. Defendant's Registered Agent in the State of Delaware is The Corporation Trust Company, and its registered office in the State of Delaware is 1209 Orange Street, Corporation Trust Center, Wilmington, New Castle County, Delaware 19801.

7. Defendant has been sued in this Judicial District no less than four times and did not contest jurisdiction in those cases.

8. Venue is proper in this Court pursuant to 28 U.S.C. 1400(b).

THE RSDI PATENTS-IN-SUIT

9. RSDI is the owner of all right, title and interest in U.S. Patent No. 9,892,637 ("the '637 Patent"), titled "Vehicle Identification System." On February 13, 2018, the '637 Patent was duly and legally issued by the United States Patent and Trademark Office ("USPTO"). The '637 Patent issued from Application No. 14/723,049, filed on May 27, 2015, and claims priority to Provisional Application No. 62/004,753, filed on May 29, 2014. A true and correct copy of the '637 Patent is attached as **Exhibit A** to this Complaint.

10. RSDI is the owner of all right, title and interest in U.S. Patent No. 10,169,987 ("the '987 Patent"), titled "Vehicle Identification System." On January 1, 2019, the '987 Patent was duly and legally issued by the United States Patent and Trademark Office ("USPTO"). The '987 Patent issued from Application No. 15/860,939, filed on January 3, 2018 and claims priority to Provisional Application No. 62/004,753, filed on May 29, 2014. A true and correct copy of the '987 Patent is attached as **Exhibit B** to this Complaint.

11. RSDI is the owner of all right, title and interest in U.S. Patent No. 10,395,525 ("the '525 Patent"), titled "Vehicle Identification System." On August 27, 2019, the '525 Patent was duly

and legally issued by the United States Patent and Trademark Office (“USPTO”). The ‘525 Patent issued from Application No. 16/198,140, filed on November 21, 2018 and claims priority to Provisional Application No. 62/004,753, filed on May 29, 2014. A true and correct copy of the ‘525 Patent is attached as **Exhibit C** to this Complaint.

12. RSDI is the owner of all right, title and interest in U.S. Patent No. 10,559,199 (“the ‘199 Patent”), titled “Vehicle Identification System.” On February 11, 2020, the ‘199 Patent was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The ‘199 Patent issued from Application No. 16/514,492, filed on July 17, 2019 and claims priority to Provisional Application No. 62/004,753, filed on May 29, 2014. A true and correct copy of the ‘199 Patent is attached as **Exhibit D** to this Complaint.

13. RSDI is the owner of all right, title and interest in U.S. Patent No. 10,748,417 (“the ‘417 Patent”), titled “Vehicle Identification System.” On August 18, 2020, the ‘417 Patent was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The ‘417 Patent issued from Application No. 16/731,558, filed on December 31, 2019 and claims priority to Provisional Application No. 62/004,753, filed on May 29, 2014. A true and correct copy of the ‘417 Patent is attached as **Exhibit E** to this Complaint.

14. The ‘637 Patent, ‘987 Patent, ‘525 Patent, ‘199 Patent and ‘417 Patents are collectively referred to as the “Patents-in-Suit”

15. RSDI is also the owner of all right, title, and interest in U.S. Patent Nos. 10,249,184, 10,467,896; 10,789,837; 10,672,265; and pending applications relating to the same (“Other RSDI RideShare Patents”). The Other RSDI RideShare Patents also relate to various rideshare technologies.

16. RSDI is the owner of all rights, title and interest in and to the Patents-in-Suit and Other RSDI RideShare Patents and possesses the exclusive right of recovery of past, present, and future infringement.

17. RSDI has not licensed the Patents-In-Suit or Other RSDI RideShare Patents to Defendant, or otherwise authorized Defendant to practice any of the claims of the Patents-in-Suit or the Other RideShare Patents.

FACTUAL BACKGROUND

18. The rideshare space has been one of the hottest growth markets worldwide.

19. However, the rapid expansion of the rideshare market has exposed substantial and serious weaknesses in vehicle/driver/passenger identification, security, and safety resulting in significant concerns for drivers and passengers, as well as growing litigation and regulatory issues.

The Parties

20. Plaintiff, RSDI is the pioneer and innovative leader in the development of rideshare technologies, including active display systems and advanced technologies for the rideshare industry.

21. The active display technology developed and patented by RSDI – referred to as LOCUS™ - provides passengers with the ability to immediately locate and securely identify the correct rideshare vehicle and driver. LOCUS™ displays a single-use identifier (e.g. a particular text string or color) that is sent simultaneously to both the driver's and passenger's cell phones/mobile device for each trip. A visor mounted display, visible from the exterior of the driver's vehicle, displays a single-use identifier matching the identifier sent to the passenger's cell phone/mobile device. In addition, LOCUS™ provides a universal delivery system for messages, logos, advertisements, driver or passenger emergency and medical alerts.

22. RSDI designed, developed and prototyped the LOCUS™.
23. Defendant, Lyft, controls a ride sharing platform that uses apps (“the Lyft App(s)”) to connect passengers requesting rides with drivers who have vehicles. Both the passenger and driver operate Lyft Apps, which are designed and controlled by Lyft. Lyft conditions participation in its ride sharing network by performance of a step or steps of a patented method and establishes the manner or timing of that performance for drivers and passengers.
24. Lyft serves over 600 cities in the U.S., as well as other cities abroad.
25. Among the cities and towns served by Lyft are cities and towns in the District of Delaware.
26. To date, Lyft has serviced well over 1 billion cumulative rides. According to its SEC filings, in 2018, Lyft serviced 30.7 million riders with 1.9 million drivers, and over 1 billion cumulative rides.
27. According to Lyft’s public financial reporting, in 2016, 2017, 2018, Lyft bookings were \$1.9 billion, \$4.6 billion and \$8.1 billion respectively.
28. Lyft’s published corporate Mission Statement is “to improve people’s lives with the world’s best transportation.”
29. Lyft provides certain software and hardware technology to its drivers and riders.
30. One such technology is the “Amp” device.
31. The Lyft Amp (pictured below) is a device for enabling riders to identify their assigned vehicle and driver.

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