


FEDEX'S INFRINGEMENT OF U.S. PATENT NO. 7,199,715

FedEx directly infringes U.S. Patent No. 7,199,715 (the “’715 patent”) in violation of 35 U.S.C. § 271(a) used and continues to use the ’715 patented invention, within the United States, without authority. FedEx uses the patented invention to infringe at least claim 1 at least as described in the chart below.

'715 Patent Claim	Elements In The Accused Instrumentalities (exemplified by GENCO’s Warehouse Management Services using RF)
Claim 1	
<p>1. A method of tracking tags at several successive points of a business process, said method comprising:</p>	<p>FedEx tracks tags at several successive points of a business process.</p> <p>As one non-limiting example, defendant GENCO, a FedEx Corporation subsidiary, tracks tags at several successive points of a business process.</p> <p>GENCO specializes in high-volume serialized fulfillment of cell phones, computers, gaming systems, cable boxes, and other technology products.</p> <div data-bbox="654 1266 1624 1791" style="border: 1px solid black; padding: 10px;">  <p>Warehousing and Distribution in the Technology Industry</p> <p>In the technology industry, the pace of product development is fast and requires high-speed, highly flexible distribution operations.</p> <p>GENCO specializes in high-volume, serialized fulfillment of cell phones, computers, GPS devices, gaming systems, cable boxes and other technology products.</p> <p>Our comprehensive warehousing and inventory management services can handle the multichannel distribution requirements of your business supply chain.</p> <p>Complete Visibility - Our Tier-1 warehouse management system (WMS) tracks product to the serial number for complete visibility from manufacture to final disposition.</p> </div> <p>(http://www.genco.com/Technology/tech-warehousing-distribution.php (highlighted))</p> <p>As part of its Warehousing capabilities and in order to keep track of its inventory</p>

'715 Patent Claim	Elements In The Accused Instrumentalities (exemplified by GENCO's Warehouse Management Services using RFID)
	<p>including at least RFID tags, at several successive points of a business process (e.g., distribution, logistics, reverse logistics).</p> <div data-bbox="743 758 1624 898" style="border: 1px solid black; padding: 5px;"> <ul style="list-style-type: none"> • Complete Visibility - Our Tier-1 warehouse management system (WMS) tracks product to the serial number for complete visibility from manufacture to final disposition. </div> <p>(http://www.genco.com/Technology/tech-warehousing-distribution.php (highlighted))</p> <div data-bbox="1016 968 1495 1230" style="border: 1px solid black; padding: 5px;"> <p>Improved control</p> <p>The potential of RFID is significant. RFID not only provides tracking throughout the supply chain, it also</p> </div> <div data-bbox="1016 1247 1495 1682" style="border: 1px solid black; padding: 5px;"> <p>enables the sharing of information with all partners along way.</p> <p>GENCO has been working with major manufacturers and retailers for the last four years, using RFID systems specifically geared to enhance track and trace capabilities in warehouses.</p> </div> <p>(http://www.genco.com/pdfs/Innovations_RFID.pdf at 1.)</p>

'715 Patent Claim	Elements In The Accused Instrumentalities (exemplified by GENCO's Warehouse Management Services using RF)
	<div data-bbox="716 680 1568 835" data-label="Section-Header"> <h2>Warehouse Management Systems</h2> </div> <div data-bbox="727 892 1624 1041" data-label="Text"> <p>Having the right warehouse management system (WMS) is critical to running an accurate, efficient <u>distribution operation</u>. As such, GENCO has invested in the industry's most advanced warehouse management systems to maximize the efficiency of your supply chain.</p> </div> <div data-bbox="727 1066 1624 1144" data-label="Text"> <p>A WMS tracks the movement of individual units to provide real-time data that can be used to improve procurement and <u>freight management</u>.</p> </div> <div data-bbox="579 1176 1468 1215" data-label="Text"> <p>(http://www.genco.com/Distribution/wms.php (highlighting added).)</p> </div> <div data-bbox="579 1228 1328 1266" data-label="Text"> <p>GENCO uses 4 types of warehouse management systems:</p> </div>

'715 Patent Claim	Elements In The Accused Instrumentalities (exemplified by GENCO's Warehouse Management Services using RF
	<p data-bbox="764 695 1609 774">Warehouse Management Systems Used Across GENCO</p> <ul data-bbox="824 810 1624 1640" style="list-style-type: none"> <li data-bbox="824 810 1609 905">• D-LogPLUS® - GENCO's proprietary WMS offers all the efficiencies of a Tier-1 package and is scalable to any size operation. <li data-bbox="824 936 1624 1129">• Manhattan Associates® - Manhattan provides a Tier-1 WMS technology with uncompromising execution to drive both efficiency and elasticity into supply chain management. Manhattan's WMS is an extremely scalable and powerful tool that can be deployed in a variety of scenarios to automate and optimize every touch point in your supply chain network. <li data-bbox="824 1161 1624 1354">• JDA/RedPrairie® - JDA/RedPrairie provides the benefits of a Tier-1 WMS without the capital costs, integration headaches or technical support requirements. JDA/RedPrairie optimizes every step of the supply chain move—from raw materials to finished goods—enabling agile, cost-effective and Lean distribution operations. This translates into lower distribution costs for you. <li data-bbox="824 1386 1624 1640">• R-Log® Returns Management Software - A critical component of reverse logistics management is GENCO's proprietary R-Log® reverse logistics software, which manages the reverse flow of products, information and cash from the point of receipt through to final disposition. R-Log is the most comprehensive and flexible reverse logistics software available. It is used worldwide across multiple industry segments to streamline processing of store returns. <p data-bbox="586 1667 1624 1738">((http://www.genco.com/Distribution/wms.) All of those 4 systems use or have the capability of integrating RFID technology to track RFID tags at several successive points in time.</p>
attempting to read each tag at each successive point;	<p data-bbox="586 1770 1317 1801">FedEx attempts to read each tag at each successive point.</p> <p data-bbox="586 1843 1624 1913">As one non-limiting example, GENCO attempts to read each tag (an RFID tag) at each successive point.</p>

'715 Patent Claim	Elements In The Accused Instrumentalities (exemplified by GENCO's Warehouse Management Services using RFID)
	<p data-bbox="753 705 1624 783">A WMS tracks the movement of individual units to provide real-time data that can be used to improve procurement and freight management</p> <p data-bbox="586 793 1187 827">http://www.genco.com/Distribution/wms.php</p> <div data-bbox="997 863 1515 1136" style="border: 1px solid black; padding: 5px;"> <p data-bbox="997 863 1515 1136">Now imagine this: You're putting product away or picking and an RFID tag is positioned at each storage location ("smart shelves") for A and B level items. Your RFID reader automatically reads and then "writes" the information to your location tag. This is then validated to your WMS.</p> </div> <p data-bbox="586 1136 1560 1169">http://www.genco.com/Logistics-Articles/article.php?aid=800742771 at 3.)</p> <div data-bbox="984 1209 1533 1430" style="border: 1px solid black; padding: 5px;"> <p data-bbox="984 1209 1533 1430">individually or by container. Product is placed on a pallet, which also has an RFID tag. As you receive product from your supplier, the tags ("this is what I am") are read — and arrival confirmed. Informa-</p> </div> <p data-bbox="586 1430 1624 1463">http://www.genco.com/Coverage/docs/Distribution-Center-Management_14090</p> <p data-bbox="1045 1518 1321 1551">Improved control</p> <p data-bbox="1045 1583 1466 1724">The potential of RFID is significant. RFID not only provides tracking throughout the supply chain, it also</p>

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