

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

NAVBLAZER, LLC,

Apple

v.

**LG ELECTRONICS, INC., AND LG
ELECTRONICS MOBILECOMM
U.S.A., INC.,**

Defendants

Case No. 6:20-cv-95

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

NavBlazer, LLC (“NavBlazer”) hereby files this Original Complaint for Patent Infringement against Defendants LG Electronics, Inc. and LG Electronics Mobilecomm U.S.A., Inc. (collectively, “Defendants”) and alleges, upon information and belief, as follows:

THE PARTIES

1. NavBlazer is a limited liability company organized and existing under the laws of the State of Florida with its principal place of business at 600 S. Dixie Highway, Suite 605, West Palm Beach, Florida 33401.
2. Defendant LG Electronics, Inc. is a corporation organized and existing under the laws of Korea with its principal place of business at LG Twin Towers, 128 Yeoui-daero, Yeongdungpo-gu, Seoul 150-721, Republic of Korea. On information and belief, this Defendant may be served with process at its principal place of business. Defendant LG Electronics, Inc. designs, makes, and sells many different products throughout the world for consumer use, including wireless mobile communications devices.

Defendant LG Electronics, Inc. is a parent corporation of Defendant LG Electronics Mobilecomm U.S.A., Inc.

3. Defendant LG Electronics Mobilecomm U.S.A., Inc. is a wholly-owned subsidiary of Defendant LG Electronics, Inc. and is a Delaware corporation with regular and established places of business in Texas at 9420 Research Blvd, Austin, Texas 78759; 21251-2155 Eagle Parkway, Fort Worth, Texas 76177; and 14901 Beach St, Fort Worth, TX 76177. Defendant LG Electronics Mobilecomm U.S.A., Inc. is registered to do business in the State of Texas and has been since at least April 3, 1984. Defendant LG Electronics Mobilecomm U.S.A., Inc. may be served with process at its registered agent for service of process at United States Corporation Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over this case under 28 U.S.C. §§ 1331, 1332, 1338, and 1367.
5. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400(b).
6. This Court has personal jurisdiction over Defendants. Defendants have continuous and systematic business contacts with the state of Texas. Defendants, directly or through subsidiaries or intermediaries (including distributors, retailers, and others), conduct business extensively throughout Texas, by shipping, distributing, making, using, offering for sale, selling, and advertising (including the provision of interactive web pages) their products and services in the state of Texas and the Western District of Texas. Defendants, directly and through subsidiaries or intermediaries (including distributors, retailers, and others), have purposefully and voluntarily placed infringing products and services into this district and into the stream of commerce with the intention and expectation that they will be purchased and used by consumers in this district. Defendants have offered and sold and

continue to offer and sell these infringing products and services in this district, including at physical stores located within this district. Defendants and their customers also commit additional acts of direct infringement in this district with respect to each asserted patent through their infringing use of the accused devices, including Defendants' servers, in this district, including when Defendants and their customers put the accused devices into service and receive a benefit, and Defendants are liable for these additional acts of direct infringement and indirect infringement in this district. Defendants have committed acts of infringement, both direct and indirect, in this district with respect to each asserted patent. More specifically, Defendant LG Electronics U.S.A., Inc. distributes wireless mobile communication devices to customers throughout the United States. Further, upon information and belief, Defendant LG Electronics Mobilecomm U.S.A., Inc. has regular and established places of business in this district at 9420 Research Blvd, Austin, Texas 78759; 21251-2155 Eagle Parkway, Fort Worth, Texas 76177; and 14901 Beach St, Fort Worth, TX 76177. Moreover, upon information and belief, Defendant LG Electronics Mobilecomm U.S.A., Inc. imports such wireless communication devices from its parent corporation Defendant LG Electronics, Inc. in South Korea, where they are designed and manufactured.

U.S. PATENT NOS. 9,075,136 AND 9,885,782

7. NavBlazer is the owner, by assignment, of U.S. Patent No. 9,075,136 and 9,885,782, each entitled "VEHICLE OPERATOR AND/OR OCCUPANT INFORMATION APPARATUS AND METHOD" (hereinafter collectively referred to as "the Patents-in-Suit").
8. The patent application that issued as the '782 Patent is a continuation application of U.S. Patent Application Ser. No. 09/259,957, filed March 1, 1999, and entitled "VEHICLE OPERATOR AND/OR OCCUPANT INFORMATION APPARATUS AND METHOD", now U.S. Pat. No. 9,075,136. U.S. Patent Application Ser. No. 09/259,957, filed March 1, 1999, claims priority to U.S.

Provisional Patent Application Ser. No. 60/076,800, filed March 4, 1998, and entitled “VEHICLE OPERATOR AND/OR OCCUPANT INFORMATION APPARATUS AND METHOD.”

9. The Patents-in-Suit are valid, enforceable, and were duly issued in full compliance with Title 35 of the United States Code.
10. The inventions described and claimed in the Patents-in-Suit were invented by Raymond Anthony Joao.
11. The priority date of each of the Patents-in-Suit is at least as early as March 4, 1998.
12. The Patents-in-Suit relate generally to an apparatus and method for providing a user with one or more possible travel routes to a destination, as well as additional information regarding the one or more possible travel routes, such as traffic conditions, road conditions, traffic flow, weather information and/or other useful information.
13. During prosecution of the '782 Patent, the patent examiner considered whether the claims of the '782 Patent were eligible under 35 USC §101 in view of the United States Supreme Court's decision in *Alice*. The patent examiner found that the claims are in fact patent eligible under 35 USC §101 because all pending claims are directed to patent-eligible subject matter, none of the pending claims are directed to an abstract idea and there would be no preemption of the abstract idea or the field of the abstract idea.

DEFENDANT'S PRODUCTS

14. Upon information and belief, Defendant sells, advertises, offers for sale, uses, or otherwise provides mobile devices that utilize the Android operating system including, but not limited to, the “LG G8X ThinQ Dual Screen,” “LG G8X ThinQ,” “LG V50 ThinQ 5G,” “LG V40 ThinQ,” “LG V35 ThinQ,” “LG V30 ThinQ,” “LG V30,” “LG V20,” “LG G7 ThinQ,” “LG Neon Plus,” “LG Aristo 4+,” “LG

Aristo 3+,” “LG Aristo 3,” “LG Tribute Royal,” “LG Tribute Empire,” “LG Stylo 5+,” “LG Stylo 5,” “LG Stylo 4,” “LG Stylo 4 Plus,” “LG Stylo 3 Plus Titanium,” “LG Stylo 3 LTE,” “LG K40,” “LG K30,” “LG K20,” “LG Journey LTE,” “LG Rebel,” “LG Rebel 4 LTE,” “LG Xpression Plus 2,” “LG Xpression Plus,” “LG Harmony 3,” “LG Arena 2,” “LG Prime 2,” “LG Escape Plus,” “LG Solo LTE,” “LG K8S,” “LG G7 fit,” “LG Q7+,” “LG Premier Pro LTE,” “LG phoenix 4,” “LG Rizio 3,” “LG Fortune 2,” “LG K8,” “LG K8+,” “LG X charge,” “LG G6,” “LG G6+,” “LG G5,” and “LG X venture” series of mobile devices (“Accused Instrumentalities”) that infringe the Patents-in Suit.

COUNT I

(Infringement of U.S. Patent No. 9,885,782)

15. Plaintiff incorporates the above paragraphs by reference.
16. Defendant has been on notice of the ’782 Patent at least as early as the date it received service of this Original Complaint.
17. Upon information and belief, Defendant has directly infringed and continues to directly infringe at least Claims 1, 2 and 7 of the ’782 Patent by making, using, importing, selling, and/or, offering for sale the Accused Instrumentalities.
18. Defendant, with knowledge of the ’782 Patent, also infringes at least Claims 1, 2 and 7 of the ’782 Patent by inducing others to infringe the ’782 Patent. In particular, Defendant intends to induce its customers to infringe the ’782 Patent by encouraging its customers to use the Accused Instrumentalities in a manner that results in infringement.
19. Defendant also induces others, including its customers, to infringe at least Claims 1, 2 and 7 of the ’782 Patent by providing technical support for the use of the Accused Instrumentalities.

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