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

TRAXCELL TECHNOLOGIES, LLC,
Plaintiff,

v.
VERIZON WIRELESS PERSONAL COMMUNICATIONS, LP,
Defendant.

CASE NO. 6:20-CV-01175

JURY DEMAND

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Traxcell Technologies, LLC. ("Traxcell") files this Original Complaint, and demand for jury trial seeking relief from patent infringement by Verizon Wireless Personal Communications, LP ("Defendant" or "Verizon"), alleging infringement of the claims of U.S. Pat. No. 9,918,196; U.S. Pat. No. 10,390,175; U.S. Pat. No. 10,701,517; U.S. Pat. No. 10,743,135; and, U.S. Pat. No. 10,820,147 (collectively referred to as "Patents-in-Suit"), as follows:

I. THE PARTIES

1. Plaintiff Traxcell is a Texas Limited Liability Company, with its principal place of business located at 103 Country Club Drive. #508, Marshall, Texas 75672.

2. Verizon Wireless Personal Communications, LP is Delaware corporation with its principal place of business at One Verizon Way, Basking Ridge, New Jersey and a registered agent for service of process at CT Corp System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136. On information and belief, Verizon Wireless Personal Communications, LP sells and offers to sell products and services throughout Texas, including in this judicial district, and introduces products and services that perform infringing processes into the stream of commerce knowing that they would be sold in Texas and this judicial district.

II. JURISDICTION AND VENUE

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

4. This Court has personal jurisdiction over Defendants because: Defendants are present within or has minimum contacts within the State of Texas and this judicial district; Defendants have purposefully availed itself of the privileges of conducting business in the State of Texas and in this judicial district; Defendants regularly conducts business within the State of Texas and within this judicial district; and Plaintiff's cause of action arises directly from Defendants' business contacts and other activities in the State of Texas and in this judicial district.

5. Venue is proper in this district under 28 U.S.C. § 1400(b). Defendants have committed acts of infringement and have a regular and established place of business in this District.

III. INFRINGEMENT ('196 Patent (attached as Exhibit A))

6. On March 13, 2018, U.S. Patent No. 9,918,196 ("the '196 patent"), attached as Exhibit A, entitled "Internet queried directional navigation system with mobile and fixed originating location determination" was duly and legally issued by the U.S. Patent and Trademark Office. Traxcell owns the '196 patent by assignment.

7. The '196 Patent's Abstract states, "A mobile wireless network and a method of operation provide directional assistance in response to an Internet query. The directional assistance is provided from a location of the querying device to a destination that may be selectively prompted based on whether the destination is a nearby business, a type of business, a street address, or another mobile device or fixed telephone location. The location of the querying

device is also selectively determined depending on whether the querying device is a wireless device such as a mobile telephone, or whether the device has a presumed fixed location, such as an ordinary telephone connected to a public-switched telephone network (PSTN).

8. The following preliminary exemplary chart provides notice of Traxcell's allegations of infringement.

Claim 1	Corresponding Structure in Accused Systems
1. A method of providing navigation assistance to a user of a communications device, the method comprising:	Verizon's wireless telecommunications network that supports the Apple Maps online navigation service together with the Apple Maps (or other navigation/mapping service provider) server-side or cloud infrastructure needed to provide the service, constitute the "Accused System". The term "Apple Maps" encompasses and includes all the versions and variants of the Apple Maps web (for PCs, laptops and other computers functioning with macOS or Mac OS X operating systems) and the Apple Maps app [Apple Maps app for iOS devices (iPhone, iPad, iPod Touch etc.,) and watchOS devices] and the applications supported by the Apple Maps Platform. The "method of providing navigation assistance to a user of a communications device" refers to the method by which Apple Maps provides online navigation assistance (directions) to a user of a communications device or UE (example: mobile phone, smartphone, laptop, tablet, iPhone, iPad, iPod Touch etc.) including the Apple Maps app or including a browser plugin enabling access to the Apple Maps website or having other means to access the Apple Maps website, for querying and receiving navigation instructions for travelling from a starting location (current location of the communications device or a location specified by its user as the 'origin') to a destination location (a location specified by the said user as the 'destination').
receiving, by a directional assistance service, an Internet query initiated at the communications device and directed via the Internet to initiate a request for	Navigation using Apple Maps online navigation service (or other navigation/mapping service) is a well-known example of off-board navigation. To elaborate, an off-board navigation system is a client/server system wherein only the user interface (UI) resides on the client's (user's) communications device and all the databases (GIS and/or mapping) and infrastructure required for computation (of route, distance, travel time, traffic etc.) reside remotely on a server or a network of servers (the server-side) located on the world wide web (www). The server-side could also comprise virtual (instead of physical) or cloud server infrastructure. The client side (user interface or UI at a user's communications device) can only communicate with the server-side via the Internet.

Claim 1	Corresponding Structure in Accused Systems
navigational assistance to a destination;	This claim element refers to the method and process involved in initiating a navigation query, using Apple Maps online navigation service, to obtain directions (navigation assistance) for travelling from a starting location to a destination location. The process involved in initiating the said navigation query includes inputting a destination location at the Apple Maps' user interface (UI) at the user's communications device, and sending the said query via Internet to the remote Apple Maps server (cloud server). The said remote Apple Maps server (cloud server) receives the said query via Internet. The term "directional assistance service" herein refers to Apple Maps online navigation service supported and facilitated by Verizon's wireless telecommunications network.
responsive to receiving the Internet query, determining whether or not the communications device is a mobile wireless communications device;	Apple Maps (or other navigation/mapping service) is is programmed to identify the "phone number" and the "device identifiers" of the communications device (UE) at which the said navigation query is initiated. In other words, Apple Maps determines whether or not the said communications device (UE) is a mobile wireless communications device (UE) "a mobile wireless communications device" refers to a mobile wireless communications device or UE (example: mobile phone, smartphone, laptop, tablet, iPhone, iPad, iPod Touch etc.), which includes the Apple Maps app or includes a browser plugin enabling access to the Apple Maps website or has other means to access the Apple Maps website for querying and receiving navigation instructions for travelling from a starting point (current location of the communication's device or a location specified by its user as the 'origin') to a destination location (a location specified by the said user as the 'destination'). The said mobile wireless communications device being a subscriber of Verizon's wireless telecommunications network services. Any wireless mobile communications device, which uses Verizon's Mobile Hotspot for connecting to the Internet and includes the Apple Maps app or a browser plugin enabling access to the Apple Maps website or has other means to access the Apple Maps website, also corresponds to this claim element. In Attachment 6, Apple's Privacy Policy document, it is clearly indicated that Apple (which includes Apple Maps) collects information such as phone number and device identifiers pertaining to the communications device (UE) at which a navigation query is initiated and communicated to the Apple Maps server. In other words, Apple Maps has means to determine whether a querying communications device (UE) is a mobile wireless communications device (UE) or not. The following is mentioned therein – "**What personal information we collect** When you create an Apple ID, apply for commercial credit, purchase a product, download a software update, register for a class at an Apple Retail Store, connect to our services, contact us including by social media or participate in an online survey, we may collect a variety of information, including your name, mailing address, phone number, email address, contact

Claim 1	Corresponding Structure in Accused Systems
	preferences, device identifiers, IP address, location information, credit card information and profile information where the contact is via social media." In the aforementioned, it is also mentioned that when a user connects to Apple's services (like Apple Maps online navigation), Apple also collects the IP address from which the said user connects to Apple's services (like Apple Maps online navigation). In other words, when a user connects to the Apple Maps server using the client-side UI on his/her communications device (UE) via Internet, the Apple Maps server collects the IP address from which the said user connects to the Apple Maps server. Based on the above information, it is confirmed that whenever a communications device uses Apple Maps, information such as mobile network information including the name of the carrier providing data services to the said communications device are collected by Apple (Apple Maps). In other words, Apple Maps can also ascertain whether the communications device (UE) at which the said navigation query is initiated, is connected to the Apple Maps server through Verizon's wireless telecommunications network service (i.e. through RF signal-based communication) or through a Wi-Fi network supported by a fixed (wired or wireless) broadband Internet service. In summary, Apple Maps has means to determine whether a querying communications device (UE) is a mobile wireless communications device (UE) or not, and also whether the said communications device (UE) is connected to the Apple Maps server through Verizon's wireless telecommunications network service (i.e. through RF signal-based communication) or through a Wi-Fi network supported by a fixed (wired or wireless) broadband Internet service.
responsive to determining that the communications device is the mobile wireless communications device, the directional assistance service determining and using a present location of the mobile wireless communications device as a location of the	If the Apple Maps online navigation service (or other navigation/mapping service) is determines that the said navigation query has been initiated at a mobile wireless communications device (UE), and that the said query was communicated through Verizon's wireless telecommunications network service (i.e. through RF signal-based communication), Apple Maps determines current location of the mobile wireless communications device (UE) and uses it as the starting point for providing navigation information (instructions or directions) to travel to the destination input by the user of the said communications device (UE). The "the mobile wireless communications device" or the "communications device" refers to the mobile wireless communications device or UE (example: mobile phone, smartphone, laptop, tablet, iPhone, iPad, iPod Touch etc.) at which the navigation query was initiated. A user can simply input a "destination" entry and initiate a navigation query on the Apple Maps' client-side user interface (UI) at the user's mobile wireless communications device (Apple Maps app on an iPhone). The Apple Maps server, upon receiving the navigation query (including input "destination") from the client-side via Internet, determines the "current location" of the user's mobile wireless communications device, uses it as the default starting point, ascertains the location of the input "destination", computes or calculates the route(s) and

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