

1
2
3
4
5
6
7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 OMEGA PATENTS, LLC,
11 a Georgia limited liability company,
12 Plaintiff,

13 v.

14 FIRSTECH, LLC,
15 a Washington limited liability company,
16 Defendant.

No. 2:20-cv-01344

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY DEMAND

17 Plaintiff Omega Patents, LLC, hereby files its Complaint against Defendant Firstech,
18 LLC, and alleges as follows:

PARTIES, JURISDICTION AND VENUE

- 19 1. Plaintiff Omega Patents, LLC (“Omega”) is a Georgia limited liability company.
20 2. Upon information and belief, Defendant Firstech, LLC (“Firstech”) is a
21 Washington limited liability company with a place of business at 21903 68th Ave. S, Kent,
22 Washington, 98032-2413. On information and belief, Firstech does business itself, or through
23 its subsidiaries and affiliates, in the State of Washington and the Western District of
24 Washington.
25
26
27

1 exclusive owner of the valid and enforceable ‘225 Patent, a copy of which is attached hereto as
2 Exhibit C.

3 10. On April 16, 2019, the United States Patent and Trademark Office duly and
4 legally reissued U.S. Patent No. RE47,354 E (“the ‘354 Patent”). Omega is the sole and
5 exclusive owner of the valid and enforceable ‘354 Patent, a copy of which is attached hereto as
6 Exhibit D. Collectively, the ‘293 Patent, the ‘278 Patent, the ‘225 Patent and the ‘354 Patent
7 are referred to herein as the “Patents-in-Suit.”

8 11. Kenneth E. Flick, the inventor of the Patents-in-Suit, is recognized as an
9 innovator in the vehicle electronics industry, having invented many improvements for the
10 vehicle electronics and security industry, including innovations covering remote start systems
11 and the vehicle data bus and vehicle tracking.

12 12. The Patents-in-Suit reflect some of Mr. Flick’s inventions in the field. Mr. Flick
13 has assigned all of his rights to the inventions claimed in the Patents-in-Suit to Omega, which
14 has owned them since the date of issuance and during the alleged infringement of Firstech.

15 13. Upon information and belief, Firstech manufactures, imports, offers for sale
16 and/or sells devices in the United States and in this Judicial District that directly or indirectly
17 infringe upon one or more claims of the Patents-in-Suit.

18 14. Firstech manufactures, uses, imports, offers for sale and/or sells the
19 Dronemobile line of products, including products such as the Drone DR-5400, X1 Max and the
20 Drone X1R (collectively the “Dronemobile Modules”). The Dronemobile line of products is
21 offered for sale online at <https://www.dronemobile.com/>.

22 15. Dronemobile Modules are multi-vehicle compatible devices designed to provide
23 smartphone control of “ALL remote start and security systems” offered by Firstech in its
24 catalog, which includes systems from Firstech and from “sister company” ADS. Dronemobile
25 Modules include both a cellular transceiver and a GPS receiver and send vehicle position
26 information to a user or a monitoring station accessed at <https://live.dronemobile.com/login>.

27

1 16. Firstech manufactures, uses, imports, offers for sale and/or sells multi-vehicle
 2 compatible remote start and security systems, including systems identified as Dronemobile
 3 compatible. For example, Dronemobile compatible systems include the Firstech “Max It” and
 4 “Start It” and the Arctic Start AR915-S/925-S/AR1900S, which are multi-vehicle compatible
 5 alone or in combination with the ADS Blade or iDatalink module. Additionally, Dronemobile
 6 compatible systems include the ADS-ALCA with RS Firmware and iDatastart units, which are
 7 multi-vehicle compatible.

8 17. Firstech also manufactures, uses, imports, offers for sale and/or sells multi-
 9 vehicle compatible remote start and security systems bundled with Dronemobile Modules,
 10 including bundles sold under the brands Arctic Start and Compustar, which are multi-vehicle
 11 compatible alone or in combination with the ADS Blade or iDatalink module.

12 18. Firstech has a network of retailers and installers that offer and install its products,
 13 including the products accused of infringement, in this District and elsewhere in the U.S.

14 19. The below chart shows Firstech and their customers infringing at least Claim 7
 15 of the ‘293 Patent:

<u>U.S. PATENT 7,305,293</u>	
OMEGA PATENT CLAIM	INFRINGING FIRSTECH PRODUCTS
7. A vehicle tracking unit comprising:	The Dronemobile DR-5400/X1-MAX/X1R is a vehicle tracking unit that “gives you instant access to your vehicle’s location.”
a vehicle position determining device, a wireless communications device, and a controller connected to said wireless communications device and said vehicle	The Dronemobile DR-5400/X1-MAX/X1R includes a vehicle position determining device, a wireless communications device, and a controller connected to said wireless communications device and said vehicle position determining device. The Dronemobile combines with “all your favorite devices including your smart watch, tablet, desktop, and more.” ¹ The Dronemobile DR-5400 is “powered by AT&T LTE Network” and uses an “on-board GPS & cell antennas” to communicate with

26 _____
 27 ¹<https://www.dronemobile.com/how-it-works>

U.S. PATENT 7,305,293

OMEGA PATENT CLAIM	INFRINGEMENT FIRSTECH PRODUCTS
<p>position determining device;</p>	<p>a controller, such as “a smart watch, tablet, desktop, and more,” connected thereto.</p> <p>The Dronemobile X1-MAX and X1R have “LTE + GPS” for customers to “[a]dd DroneMobile smartphone control and GPS tracking to a compatible remote start and security system.”²</p>
<p>said controller being switchable to an armed mode when a user is away from the vehicle for cooperating with said wireless communications device and said vehicle position determining device to generate at least one speeding alert message notification for the user based upon the vehicle exceeding a speed threshold for longer than a predetermined time indicative of aggressive driving of the vehicle.</p>	<p>The Dronemobile DR-5400/X1-MAX/X1R includes a controller being switchable to an armed mode when a user is away from the vehicle for cooperating with said wireless communications device and said vehicle position determining device to generate at least one speeding alert message notification for the user based upon the vehicle exceeding a speed threshold for longer than a predetermined time indicative of aggressive driving of the vehicle.</p> <p>The Dronemobile DR-5400/X1-MAX/X1R allows one to “set a max speed for your vehicle to get alerts when your car exceeds the limit.”³</p> 

20. The below chart shows Firstech and their customers infringing at least Claim 1 of the ‘278 Patent:

² <https://www.dronemobile.com/products/x1max-lte>; <https://www.dronemobile.com/products/x1r-lte>

³ <https://www.dronemobile.com/how-it-works/gps-tracking>; <https://www.dronemobile.com/how-it-works/family-sharing>

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.