

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**SIPCO, LLC, and IP CO., LLC (d/b/a  
INTUS IQ)**

**Plaintiff,**

**v.**

**STREETLINE, INC.; and KAPSCH  
TRAFFICCOM HOLDING CORP.**

**Defendants.**

**Civil Action No.**

**JURY TRIAL DEMANDED**

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**COMPLAINT FOR PATENT INFRINGEMENT**

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This is an action for patent infringement in which Plaintiffs SIPCO, LLC and IP CO., LLC (“Plaintiffs”) complains against Defendants Streetline, Inc. and Kapsch Trafficcom Holding Corp., all upon information and belief, as follows:

**PARTIES**

1. Plaintiff SIPCO, LLC (“SIPCO”) is a limited liability company organized and existing under the laws of the State of Georgia, having its principal office at 2600 Abbey Court, Alpharetta, Georgia, 30004.

2. IP CO, LLC (d/b/a INTUS IQ) (“IP CO”) is a limited liability company organized and existing under the laws of the State of Georgia, having its principal office at 8215 Roswell Road, Building 900, Suite 950, Atlanta, Georgia 30350.

3. Defendant Streetline Inc. is a corporation organized under the laws of Delaware, with its principal place of business located at 1200 Park Place, San Mateo, CA 94403

(“Streetline”). Streetline may be served with process by serving its registered agent, Incorporating Services, Ltd., 3600 S Dupont Highway, Dover, DE 19901.

4. Defendant Kapsch Trafficcom Holding Corp. is a corporation organized under the laws of Delaware, with its principal place of business in McLean, Virginia, and may be served with process by serving its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Kapsch Trafficcom Holding Corp. is a wholly-owned subsidiary of Kapsch TrafficCom B.V., of Amsterdam, Netherlands, which is a wholly-owned subsidiary of Kapsch TrafficCom AG, of Vienna, Austria, a publicly held corporation.

5. On or about April 16, 2015, Kapsch Trafficcom Holding Corp. acquired a majority and controlling interest in Streetline, so that Streetline operates as a wholly-owned subsidiary of Kapsch Trafficcom Holding Corp.

6. Streetline and Kapsch Trafficcom Holding Corp. shall hereafter be collectively referenced as “Streetline,” unless the context otherwise dictates.

#### **JURISDICTION AND VENUE**

7. This action arises under the patent laws of the United States, Title 35 of the United States Code. Thus, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. This Court has personal jurisdiction over Defendants by virtue of the Defendants being corporations created and existing under the laws of the State of Delaware.

9. Venue is proper in this Judicial District as to each Defendant under 28 U.S.C. §§ 1391(c) and 1400(b) by virtue of the Defendants being corporations created and existing under

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the laws of the State of Delaware.

### **PLAINTIFFS**

10. SIPCO and IP CO are small research, development and technology companies based in Atlanta, Georgia. T. David Petite is a founding member of both companies.

11. In the 1990's, through his own individual research and development efforts, Mr. Petite invented a large number of wireless control and distribution technology applications. The inventions resulting from Mr. Petite's efforts include, but are not limited to, various ways of moving data as economically and seamlessly as possible over both wired and wireless networks.

12. Through the 1990's and early 2000's investors contributed tens of millions of dollars for technology development and implementation of networks. Clients included Georgia Power, Alabama Power, Newnan Utilities GA, Johnson Controls, Synovus Bank and Grand Court Lifestyles residential living facilities.

13. After proving that the technology worked in the field, several companies competed to purchase an exclusive license to Mr. Petite's technology for the market known as "smart grid." Landis+Gyr (<http://www.landisgyr.com/>) (previously Siemens Metering) took an exclusive license to the smart grid technology in 2002 and in 2005 purchased rights to the technology for utility applications for \$30,000,000. Mr. Petite's technology has been deployed in millions of meters deployed across North America and throughout the world.

14. SIPCO retained the rights to the mesh network patents, and for use of the technology outside of the utility space. It still maintains ownership of the software, firmware, hardware and patent portfolio that resulted from Mr. Petite's research and development efforts, and SIPCO continues to develop and deploy wireless technology applications and wireless

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technology systems throughout the United States.

15. SIPCO's patent portfolios (of which the patents in suit are a part) include inventions that are widely recognized as pioneering in various fields of use. As a result, over 75 corporations have taken licenses to them. Licensees include companies operating in the vertical markets of Industrial Controls, Smart Grid, Building Automation, Network Backhaul, Home Appliance, Home Automation and Entertainment, Sensor Monitoring, and Internet Service Provisioning. Licensed products include products using standard wireless mesh protocols such as WirelessHART, ZigBee, IEEE 802.15.4, Z-Wave, and as well as proprietary wireless protocols such as that marketed by Enocean.

**COUNT I**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,908,842**

16. Plaintiffs hereby restates and re-alleges the allegations set forth in the preceding paragraphs 1-15 and incorporates them by reference.

17. Plaintiff SIPCO is the owner by assignment of United States Patent No. 8,908,842 entitled "Multi-Functional General Purpose Transceivers and Devices." ("the '842 Patent"). The '842 Patent was duly and legally issued on December 9, 2014. A true and correct copy of the '842 Patent is attached as Exhibit 1.

18. Defendants have directly infringed and continue to infringe at least claim 16 of the Patent (literally and/or under the doctrine of equivalents) by making, having had made, using, offering for sale and selling, or offering for use and using, the Streetline smart parking monitoring hardware and software systems in combination with one or more of Parker (which guides drivers to available parking spaces), ParkerMap (a free service for city merchants that enables them to provide real-time parking information to their patrons, and which can be

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embedded on a merchant's website and automatically updates with the latest parking information to ease shoppers' planning process), ParkEdge (a self-publishing tool that enables public and private off-street parking to publish their parking garage and lot locations, space inventory, rates, hours, and availability in real-time), Enforcement (a mobile application that enables the City and its enforcement team to improve compliance and achieve optimal turnover), ParkSight Analytics™ (a Software-as-a-Service (SaaS) which provides parking data that can be accessed 24/7 with a secure login credential via the web) and/or ParkingData (which provides access to data for parking locations and availability through two complementary APIs), within the scope of the claims.

19. Defendants' acts of infringement have caused and continue to cause damage to Plaintiffs. Plaintiffs are entitled to recover from Defendants the damages sustained by Plaintiffs as a result of Defendants' wrongful acts.

**COUNT II**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,625,496**

20. Plaintiffs hereby restates and re-alleges the allegations set forth in the preceding paragraphs 1-15 and incorporates them by reference.

21. Plaintiff IP CO is the owner by assignment of United States Patent No. 8,625,496 entitled "Wireless Network System and Method for Providing Same." ("the '496 Patent"). The '496 Patent was duly and legally issued on January 7, 2014. A true and correct copy of the '496 Patent is attached as Exhibit 2.

22. Defendants have directly infringed and continue to infringe at least claim 27 of the Patent (literally and/or under the doctrine of equivalents) by making, having had made, using, offering for sale and selling, or offering for use and using, the Streetline smart parking

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