

EXHIBIT B

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.; and
KAPSCH TRAFFICCOM U.S. CORP.

Defendants.

Civil Action No. 1:16-cv-00830-RGA

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

This is an action for patent infringement in which Plaintiffs SIPCO, LLC and IP CO., LLC (“Plaintiffs”) complains against Defendants Streetline, Inc., Kapsch Trafficcom Holding Corp. and Kapsch Trafficcom ~~Holding~~ U.S. 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~~ Defendant Kapsch Trafficcom U.S. Corp. 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”). Kapsch Trafficcom U.S. Corp. may be served with process by serving its registered agent, The Corporation Trust Company., Corporation Trust Center 1209 Orange Street, Wilmington, DE 19801.

7. Kapsch Trafficcom Holding Corp. and Kapsch Trafficcom ~~Holding~~ U.S. Corp. ~~shall~~ may hereafter be collectively referenced as “~~Streetline,~~” ~~unless the context otherwise dictates.~~ Kapsch Defendants.”

JURISDICTION AND VENUE

~~7.8.~~ This action arises under the patent laws of the United States, Title 35 of the

~~Original~~ First Amended Complaint ~~for~~ For Patent

Infringement

~~Original~~ First Amended Complaint ~~for~~ For Patent
Infringement

1331 and 1338(a).

~~8.~~9. This Court has personal jurisdiction over all Defendants by virtue of the Defendants being corporations created and existing under the laws of the State of Delaware.

~~9.~~10. 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 the laws of the State of Delaware.

PLAINTIFFS

~~10.~~11. 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.~~12. 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.~~13. 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.~~14. 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

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