

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

GEOGRAPHIC LOCATION
INNOVATIONS LLC,

Plaintiff,

vs.

VIA TRANSPORTATION, INC.,

Defendant.

§
§
§
§
§
§
§
§
§
§
§

Case No:

PATENT CASE

COMPLAINT

Plaintiff Geographic Location Innovations LLC (“Plaintiff” or “GLI”) files this Complaint against Via Transportation, Inc. (“Defendant” or “Via”) for infringement of United States Patent No. 7,917,285 (hereinafter “the ‘285 Patent”).

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company with a virtual office located at 1400 Preston Rd, Suite 400, Plano, TX 75093.

4. On information and belief, Defendant is a Delaware corporation with its principal office located at 160 Varick Street, 4th Floor, New York, New York 10013. On information and belief, Defendant may be served with process through its registered agent,

Corporation Service Company, 251 Little Falls Dr., Wilmington, DE 19808.

5. On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7. On information and belief, venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District.

COUNT I **(INFRINGEMENT OF UNITED STATES PATENT NO. 7,917,285)**

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10. Plaintiff is the owner by assignment of the '285 Patent with sole rights to enforce the '044 Patent and sue infringers.

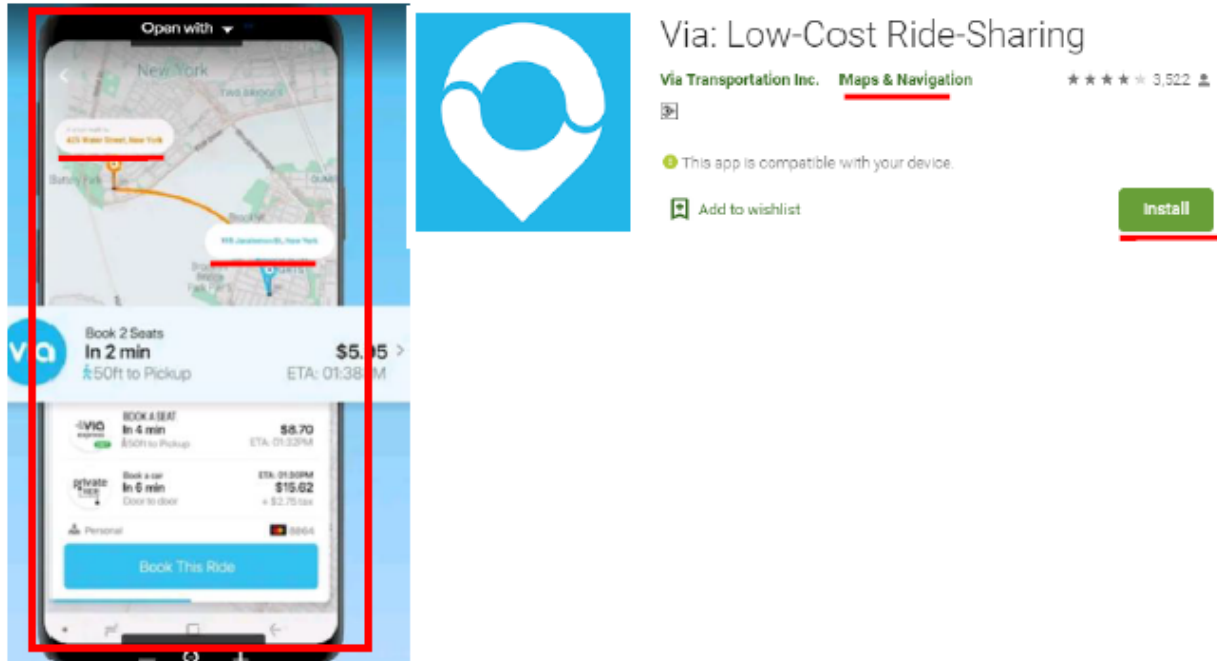
11. A copy of the '285 Patent, titled "Device, System and Method for Remotely Entering, Storing and Sharing Addresses for a Positional Information Device," is attached hereto as Exhibit A.

12. The '285 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 13, of the '285 Patent by making, using (at least

by having its employees, or someone under Defendant's control, test the System), importing, selling, and/or offering for sale a mobile website with associated hardware and software embodied, for example, in its ride-sharing service Via (the "System") covered by at least Claim 13 of the '285 Patent. The System is used, for example, in connection with Defendant's website and its mobile app. Defendant has infringed and continues to infringe the '285 patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

14. The System includes the mobile website and associated hardware. These tools provide for remote entry of location information, such as driver, passenger and destination locations into a positional information device such as, for example, a tablet or smart phone. The website automatically loads locations onto the positional information device based on the user's location. The System is a ride booking application in which user can book rides by entering their pickup and destination location (i.e. positional information) installed on a smartphone (i.e. a positional information device). Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

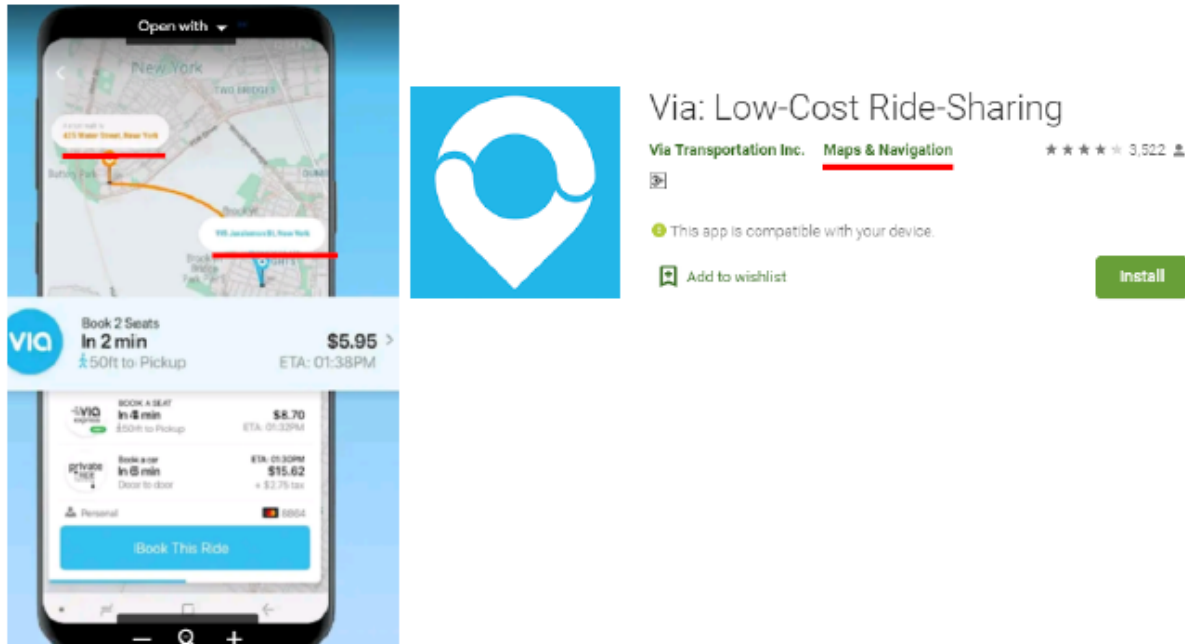


Source: <https://play.google.com/store/apps/details?id=via.rider&hl=en>

15. The System includes one or more servers that receive a request for an address of at least one location such as, for example, the pickup location for a user, which is not already stored in the positional information device. The user can book a ride by sending a request to a server (Via's server) using the smartphone (positional information device). The server may then, based on the user's request, share the address of the location (where nearby pickup is) that is not stored in the smartphone (i.e. positional information device) with the user. Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

How it works:

Set your pickup and drop off to request a ride. We'll match you with a Via driver headed your way. Our smart pickup coordination will direct you to a nearby corner to meet your driver, so your Via and its passengers never have to go out of their way. We pool riders into the same car efficiently and without delays, keeping our price point affordable for everyone.



Source: <https://play.google.com/store/apps/details?id=via.rider&hl=en>

16. The server(s) determine the address(es) of the pickup location and transmits the determined address to the positional information device (e.g., tablet or smartphone). For example, the server(s) transmits to the positional information device a visual indication of the location on a map.

17. (Via) installed on the smartphone (i.e. positional information device) is able to utilize the GPS location (i.e. location information module) of the smartphone (i.e., positional information device). Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

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.