

3. The Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Wilmington, Delaware 19801.

JURISDICTION AND VENUE

4. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

5. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338(a).

6. Venue in this District is proper under 28 U.S.C. § 1391 and 28 U.S.C. § 1400(b) against FCA because, on information and belief, FCA (1) has committed acts of infringement in this District and (2) has a regular and established place of business in this District.

7. This Court has personal jurisdiction over FCA. FCA has continuous and systematic business contacts with the State of Ohio. Specifically, FCA conducts business, has committed acts of patent infringement, and has induced acts of patent infringement by others in this District, the State of Ohio, and elsewhere in the United States.

8. FCA, directly and through subsidiaries or intermediaries, has committed and continues to commit acts of infringement in this District by, among other things, designing, developing, manufacturing, importing, offering to sell, and selling products that infringe the Asserted Patents.

9. FCA does and intends to do business in Ohio and in this District, directly or through intermediaries, and offers its products and/or services, including those accused herein of infringement, to customers and potential customers located in Ohio and in this District.

10. FCA, both directly and through its subsidiaries or intermediaries (including distributors, retailers, and others), has purposefully and voluntarily placed one or more infringing products and/or services, as described below, into the stream of commerce with the expectation

that those products will be purchased and used by customers and/or consumers in the Northern District of Ohio.

11. FCA maintains facilities throughout the State of Ohio, including at least the FCA US Toledo Assembly Complex at 4000 Stickney Ave, Toledo, Ohio 43608.

12. The Toledo Assembly Complex is made up of 3.64 million square feet of floor space over 312 acres of land.¹ The Toledo Assembly Complex employs approximately 6,290 people and is made up of two plants: the Toledo Supplier Park and Toledo North.²

13. FCA has been and continues to make, use, sell, offer for sale, assemble, purchase, and import infringing products and/or services within the Northern District of Ohio.

14. FCA has placed the Accused Products into the stream of commerce by selling and/or offering to sell the Accused Products in the Northern District of Ohio, shipping Accused Products into the Northern District of Ohio, and/or shipping Accused Products knowing that those products would be shipped into the Northern District of Ohio.

THE ASSERTED PATENTS

I. The '366 Patent

15. On June 18, 2013, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,467,366 (“the '366 patent”), entitled “Methods and Apparatus for Random Access in Multi-Carrier Communication Systems.” A copy of the '366 patent is attached as Exhibit 1.

16. The '366 patent issued from U.S. Patent Application 13/205,579, which was filed by Neocific Inc. on August 8, 2011 on behalf of the inventors. The now-issued '366 patent was

¹ See <https://media.stellantisnorthamerica.com/newsrelease.do?id=339>.

² See *id.*

assigned from Neocific, Inc. to CFIP NCF LLC on November 22, 2019 before it was assigned to Neo Wireless LLC on January 23, 2020.

17. The '366 patent is valid and enforceable.

II. The '908 Patent

18. On November 11, 2020, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,833,908 (“the '908 patent”), entitled “Channel Probing Signal for a Broadband Communication System.” A copy of the '908 patent is attached as Exhibit 2.

19. The '908 patent issued from U.S. Patent Application 16/902,740, which was filed on June 16, 2020 by Neo Wireless LLC on behalf of the inventors.

20. The '908 patent is valid and enforceable.

III. The '941 Patent

21. On September 11, 2018, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,075,941 (“the '941 patent”), entitled “Methods and Apparatus for Multi-Carrier Communications With Adaptive Transmission and Feedback.” A copy of the '941 patent is attached as Exhibit 3.

22. The '941 patent issued from U.S. Patent Application 15/082,878, which filed by Neocific, Inc. on March 28, 2016. The now-issued '941 patent was assigned from Neocific, Inc. to CFIP NCF LLC on November 22, 2019 before it was assigned to Neo Wireless LLC on January 23, 2020.

23. The '941 patent is valid and enforceable.

IV. The '450 Patent

24. On October 15, 2019, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,447,450 (“the '450 patent”), entitled “Method and System for

Multi-Carrier Packet Communication with Reduced Overhead.” A copy of the ’450 patent is attached as Exhibit 4.

25. The ’450 patent issued from U.S. Patent Application 15/676,421, which was filed by Neocific, Inc. on August 14, 2017. The now-issued ’450 patent was later assigned from Neocific, Inc. to CFIP NCF LLC on November 22, 2019 before it was assigned to Neo Wireless LLC on January 23, 2020.

26. The ’450 patent is valid and enforceable.

V. The ’512 Patent

27. On March 30, 2021, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,965,512 (“the ’512 patent”), entitled “Method and Apparatus Using Cell-Specific and Common Pilot Subcarriers in multi-Carrier, Multi Cell Wireless Communication Networks.” A copy of the ’512 patent is attached as Exhibit 5.

28. The ’512 patent issued from U.S. Patent Application 17/012,813, which was filed by Neo Wireless on September 4, 2020.

29. The ’512 patent is valid and enforceable.

VI. The ’302 Patent

30. On September 8, 2020, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,771,302 (“the ’302 patent”), entitled “Channel Probing Signal for a Broadband Communication System.” A copy of the ’302 patent is attached as Exhibit 6.

31. The ’302 patent issued from U.S. Patent Application 15/953,950, which was filed on April 16, 2018 and was assigned from Neocific, Inc. to CFIP NCF LLC on November 22, 2019 before it was assigned to Neo Wireless LLC on January 23, 2020.

32. The ’302 patent is valid and enforceable.

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