

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

GROUPCHATTER, LLC,

Plaintiff,

v.

GENERAL ELECTRIC COMPANY,  
GE ENERGY MANAGEMENT  
SERVICES, INC., and GE GRID  
SOLUTIONS, LLC,

and

LANDIS+GYR TECHNOLOGIES, LLC  
and LANDIS+GYR TECHNOLOGY, INC.,

and

ITRON, INC.

Defendants.

CIVIL ACTION FILE

NO. 1:16-cv-00486-WSD  
[LEAD CASE]

NO. 1:16-cv-00711-TCB

NO. 1:16-cv-01800-WSD

**PLAINTIFF'S FIRST AMENDED COMPLAINT AND JURY DEMAND**

Plaintiff GroupChatter, LLC files this First Amended Complaint against Defendants General Electric Company, GE Energy Management Services, Inc. and GE Grid Solutions, LLC (collectively, "GE") for infringement of: U.S. Patent Nos. 7,969,959; 8,199,740; 8,588,207; and 9,014,659.

## THE PARTIES

1. Plaintiff GroupChatter, LLC (“GroupChatter”) is a Texas limited liability company with its headquarters and principal place of business at 1400 Preston Road., Suite 475, Plano, Texas 75093.

2. Defendant General Electric Company is a New York corporation with its principal place of business at 3135 Easton Turnpike, Fairfield, CT, 06828-0001. General Electric Company may be served through its registered agent CT Corporation, 1999 Bryan St., Ste. 900, Dallas, TX 75201-3136.

3. Defendant GE Energy Management Services, Inc., is a Delaware corporation with its principal place of business at 4200 Wildwood Pkwy Bldg 2018, Atlanta, GA 30339. GE Energy Management Services, Inc., may be served through its registered agent CT Corporation, 1999 Bryan St., Ste. 900, Dallas, TX 75201-3136.

4. Defendant GE Grid Solutions, LLC is a Delaware corporation with its principal place of business at 4200 Wildwood Pkwy Bldg 2018 N6-04A-03, Atlanta, GA 30339. GE Grid Solutions, LLC may be served through its registered agent CT Corporation, 1999 Bryan St., Ste. 900, Dallas, TX 75201-3136.

5. GE has appeared and answered.

## **JURISDICTION AND VENUE**

6. GroupChatter brings this action for patent infringement under the patent laws of the United States, namely 35 U.S.C. §§ 271, 281, and 284-285, among others. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1338(a), and 1367.

7. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c) and 1400(b). Defendant does business in this judicial district, has committed acts of infringement in this judicial district, has purposely transacted business in this judicial district involving the accused products and/or, has regular and established places of business in this judicial district.

8. Defendants are subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long-Arm Statute, due at least to its substantial business in this State and judicial district, including: (A) at least part of its infringing activities alleged herein; and (B) regularly doing or soliciting business, engaging in other persistent conduct, and/or deriving substantial revenue from goods sold and services provided to Texas residents.

## **GROUPCHATTER PATENTS**

9. GE infringes, directly and indirectly, the following patent claims: '959 Patent claims 1, 2, 3, 8, 10, 13, 14, 17, 18, 20, 21, 29, and 30; '740 Patent claims 1,

2, 3, 4, 5, 10, 11, 12, 13, 14, 15, 20, and 21; '207 Patent claims 1, 2, 3, 8, 9, and 11; and '659 Patent claims 1, 2, 3, 4, 8, 10, 11, 12, 13, and 16 (the “GE Asserted Claims”).

10. The GE Asserted Claims relate to methods, apparatuses, and systems for providing acknowledged, deterministic group messaging over a two-way wireless network. Broadly speaking, GroupChatter accuses GE of infringement based upon GE’s provision, management, operation, and deployment of wireless networks that perform deterministic group messaging, for example, by broadcasting wireless messages to a group of smart utility meters (e.g., electric meters), tracking responses (or lack of responses) from them, and providing up-to-the-minute status of the utility grid.

11. The GE Asserted Claims describe a specific two-way communication system with a network architecture and addressing scheme providing a novel way to perform deterministic group messaging.

12. “Deterministic” group messaging refers to one of the advantages delivered by the inventions. Using the claimed system offers the potential benefit of providing timely updates for endpoints within a group. In operation, endpoints (e.g., meters, pagers) send responses to group messages and thereby provide data from which to determine the status of each endpoint.

13. The inventors noted in the specification's Background of the Invention section that in the realm of public safety communication networks, for example, a communication system comprised of endpoints capable of acknowledging group messages fails to provide the valuable advantage of deterministic communication because such a system provides no structure or capability to maintain status of each group member, leaving an administrator lacking important data about the status of the endpoint group.

14. To solve this problem and other shortcomings of prior two-way wireless messaging networks, the inventors conceived a novel combination using a group addressing scheme for use on a wireless two-way network and described in the GroupChatter Patents how to build and deploy the network architecture to use it and achieve its benefits.

15. In the GE Asserted Claims, grouped endpoints are identified by at least two addresses—a unique primary identifying address and at least one group address. In addition to the two-way, point-to-multipoint wireless architecture of the radio network, a client/server-based architecture is provided for communication between a network client and the two-way wireless network.

16. Through the access provided via the client/server end of the communication network, a user is provided group information that may include

# 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.