

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

TRAXCELL TECHNOLOGIES, LLC.,)	
Plaintiff,)	
)	Civil Action No. 6:21-cv-01312
v.)	
)	
GOOGLE LLC)	Jury Trial Demanded
Defendant.)	

PLAINTIFF’S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Traxcell Technologies, LLC. (“Traxcell”) files this Original Complaint, and demand for jury trial seeking relief from patent infringement by Google LLC (“Defendant” or “Google”), alleging infringement of the claims of U.S. Pat. No. 10,820,147 (collectively referred to as “Patent-in-Suit”), as follows:

I. THE PARTIES

1. Plaintiff Traxcell is a Texas Limited Liability Company, with its principal place of business located at 103 Country Club Drive. #508, Marshall, Texas 75672.

2. Defendant Google LLC is a Delaware corporation with a principal place of business located at 1600 Amphitheater Parkway, Mountain View, California 94043. Google designs, manufactures, uses, imports into the United States, sells, and/or offers for sale in the United States smartphones, tablets, iPods, desktop computers, and notebook computers that use Google Maps. Googlemarkets, sells, and offers to sell its products and/or services, including those accused herein of infringement, to actual and potential customers and end-users located in Texas and in the judicial Western District of Texas such as at the Google maintains a permanent physical presence within the Western District of Texas, conducting business from at least its locations at: 9606 North Mo- Pac Expressway, Suite 700, Austin, Texas 78759; 500 West 2nd Street, Suite 2000, Austin, Texas

78701; 4100 Smith School Road, Austin, Texas 78744; as well as other locations in and around the Austin area.

3. Google is registered to do business in Texas and can be served via its registered agent, Corporation Service Company dba CSC – Lawyers Incorporating Service Company at 211 East 7th Street, Suite 620, Austin, Texas 78701-3218.

4. Google has placed or contributed to placing infringing products like the Google Maps for use on a computing device connected to a wireless network into the stream of commerce via an established distribution channel knowing or understanding that such products would be sold and used in the United States, including in the Western District of Texas. On information and belief, Google also has derived substantial revenues from infringing acts, including but not limited to advertising, business APIs, private usage, OEM usage, and/or the like.

II. JURISDICTION AND VENUE

5. This is an action for patent infringement arising under the patent laws of the U.S., 35 U.S.C. §§ 1 et. seq. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1332(a) and 1338(a).
6. This Court has personal jurisdiction over Defendants because: Defendants are present within or has minimum contacts within the State of Texas and this judicial district; Defendants have purposefully availed itself of the privileges of conducting business in the State of Texas and in this judicial district; Defendants regularly conducts business within the State of Texas and within this judicial district; and Plaintiff's cause of action arises directly from Defendants' business contacts and other activities in the State of Texas and in this judicial district. The amount in controversy is more than \$75,000.00.

7. Venue is proper in this judicial district per 28 U.S.C. §§ 1391 and 1400(b). Google has committed acts of infringement in this judicial district and maintains regular and established places of business in this district, as set forth above. Google has continuous and systematic business contacts with the State of Texas. Google, directly or through subsidiaries or intermediaries (including distributors, retailers, contract manufacturers, and others), conducts its business extensively throughout Texas, by shipping, manufacturing, distributing, offering for sale, selling, and advertising (including the provision of interactive web pages) its products and services in the State of Texas and the Western District of Texas. Google, directly or through subsidiaries or intermediaries (including distributors, retailers, contract manufacturers, and others), has purposefully and voluntarily placed its infringing products and services into this District and into the stream of commerce with the intention and expectation that they will be purchased and used by consumers in this District.

III. INFRINGEMENT ('147 Patent (Attached and incorporated by reference))

8. On October 27, 2020, U.S. Patent No. 10,820,147 (“the ’147 patent”) entitled “Mobile wireless device providing off-line and on-line geographic navigation information” (attached as Exhibit C) was duly and legally issued by the U.S. Patent and Trademark Office. Traxcell owns the ’147 patent by assignment.

9. The ’147 Patent’s Abstract states, “A mobile device, wireless network and their method of operation provide both on-line (connected) navigation operation, as well as off-line navigation from a local database within the mobile device. Routing according to the navigation system can be controlled by traffic congestion measurements made by the wireless network that allow the navigation system to select the optimum route based on expected trip duration.”

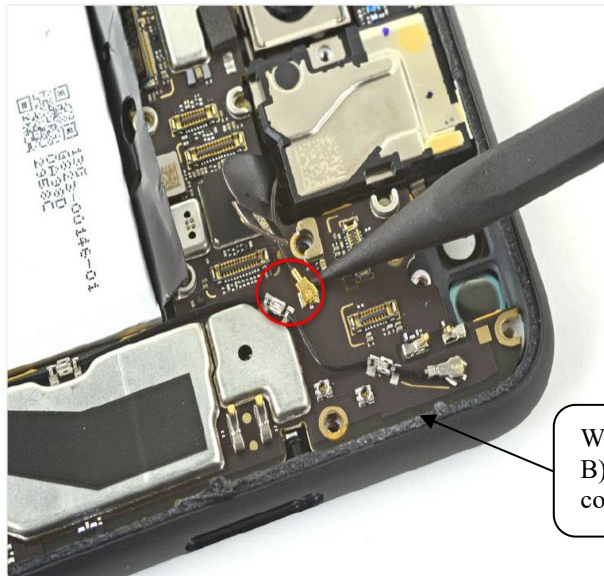
10. The following preliminary exemplary chat provides Traxcell’s allegations of infringement.

Claim 1	Corresponding Structure in Accused Systems
<p>1. A wireless communications system including:</p>	<p>The Google Maps online navigation service and the Google Maps server-side or cloud infrastructure needed to provide the service, constitute the “Accused System”.</p> <p>Each combination having at least one item listed on Exhibit A, at least one item listed on Exhibit B, and at least one item listed on Exhibit C is a wireless communications system.</p> <p>Because infringement liability is not dependent on ownership, e.g., use of a system can infringe (35 U.S.C. § 271), infringement is not dependent on ownership of all limitations of a claim.</p>
<p>a first radio-frequency transceiver within a wireless mobile communications device and an associated first antenna to which the first radio-frequency transceiver is coupled, wherein the first radio-frequency transceiver is configured for radio-frequency communication with a wireless communications network;</p>	<p>Plaintiff contends each item listed on Exhibit B corresponds to this claim limitation because each Exhibit-B item is a device that provides communicative access to a wireless network by transceivers designed and used for radio-frequency communication and at least one antenna. When a wireless communication device transceivers and antennas are in communication, they are coupled. Further, in addition to being so coupled, the transceiver of each Exhibit-B item is also configured for RF-communication wireless communication networks, such as AT&T, Verizon, T-Mobile, and other US networks (Cellular or WLAN) via Google Maps which comes preloaded on Exhibit-B items.</p> <p>Plaintiff contends each item listed on Exhibit B corresponds to this claim limitation because each Exhibit-B item includes a radio frequency transceiver. Wireless mobile communication device — including but not limited to Google’s branded devices such as Google Pixel 5, pixel 4a 5G, pixel 4a, pixel 4 XL, pixel 4, pixel 3a XL, pixel 3a, pixel 3 XL, pixel 3, pixel 2, pixel 2 XL, pixel XL, pixel, pixel C or other (third-parties) branded devices such as Samsung Galaxy S20 Ultra, Galaxy S20 plus, Galaxy S20, Galaxy Z fold, Galaxy S10, Galaxy A series, etc. (refer Exhibit B for complete list) — include radio-frequency transceivers and an associated antenna. When wireless communication device transceivers and antennas are in communication, they are coupled. Further, in addition to being so coupled, the transceiver of each Exhibit-B item is also configured for RF-communication with the wireless communication network.</p> <p>The following exemplifies this limitation’s existence in Accused Systems:</p>

Claim 1

Corresponding Structure in Accused Systems

Step 37 Disconnect the antennas



- Use the pointed end of a spudger and pry up gently to unclip the top antenna connector from the motherboard.
- Disconnect the bottom antenna connector.

Wireless mobile communication device (Exhibit B), such as Google pixel 4a includes antenna connector.

Attachment 1 (Google Pixel 4XL showing antenna connector) at 21.



Google Pixel 4a 5G Disassembly Teardown Repair Video Review

3,430 views • Dec 5, 2020

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Source: Antenna of Google pixel 4a Teardown by PBKreviews (Time 3:58/8:36)

Link: <https://www.youtube.com/watch?v=pTPup76PxNo>

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