

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

MIRA ADVANCED TECHNOLOGY  
SYSTEMS, INC.,

Plaintiff,

v.

GOOGLE LLC.,

Defendant.

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CIVIL ACTION NO. \_\_\_\_\_

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Mira Advanced Technology Systems, Inc. (“Mira”) for its Complaint with Jury Demand for patent infringement against defendant, Google LLC. (“Google”), alleges based on information and belief, as follows:

**THE PARTIES**

1. Plaintiff Mira is a West Virginia corporation, with its principal place of business in West Virginia.
2. On Information and belief, Defendant Google is a Delaware corporation having a principal place of business in Mountain View, California.

**NATURE OF THE ACTION**

3. This is a civil action for infringement of the United States Patent No. 10,594,854 (the “Asserted Patent” or the “854 patent”). This action arises under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*
4. Google makes, uses, imports, offers to sell, and sells in the United States, including this District, Google Keep software application (the “Accused Software Product”), which, when running and being operated in a smart communication device (e.g., a smart phone) equipped with on-

Google. Exhibit 1017

board GPS module, causes the smart communication device to perform the method claimed in the Asserted Patent described herein, including claims 1, 3, 5 and 7 (hereinafter “the Asserted Claims”) thereof.

### **JURISDICTION AND VENUE**

5. This Court has subject matter jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Google in this action. First, Google committed acts of infringement in this District. Google placed, and continues to place, the Accused Software Product into the stream of commerce, through established distribution channels, with the knowledge and understanding that the Accused Software Product is used in this District. This causes injury to Mira. Second, on information and belief, Google derives substantial revenue from the distribution of the Accused Software Product within this District and through interstate commerce. Accordingly, Google has committed acts within this District giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Google would not offend traditional notions of fair play and substantial justice.

7. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400 (b). Google is registered to do business in Virginia. On information and belief, Google has transacted business in this District and has committed acts of direct and indirect infringement in this District. Google has a regular and established place of business in this District located at 1900 Reston Metro Plaza #16, Reston, VA 20190.

**THE PATENT-IN-SUIT**

8. The Asserted Patent, United States Patent No. 10,594,854, entitled “Location Based Personal Organizer,” was duly and legally issued on March 17, 2020, by the United States Patent and Trademark Office. A copy of the Asserted Patent is attached hereto as Exhibit A.

9. Mira is the owner of all right, title, and interest of the Asserted Patent.

10. Each claim of the Asserted Patent is valid and enforceable.

11. The Asserted Patent is generally related to a location-based reminder function performed by a smart communication device with display, such as a smartphone, that is equipped with on-board GPS module. Location-based reminder, as is used herein, refers to a reminder (e.g. in the form of a reminder text) being displayed, or otherwise alerted, to a user in real-time when the user’s contemporaneous physical geographical location, as captured by the user’s communication device through its on-board GPS module, matches with a set of GPS coordinates of a physical geographical location (associated with, e.g., the reminder text) *pre-set* in the volatile or non-volatile memory of the communication device.

12. An above-described location-based reminder function is known to operate on one or more pre-set location-based reminder entries (displayed in a communication device). For each such a reminder entry, a set of GPS coordinates of an associated (intended)<sup>1</sup> physical geographical location (associated with, e.g., a reminder text inputted in and for the same reminder entry by the user) *must*

<sup>1</sup> The geographical location associated with the respective reminder text (in and for the reminder entry) was the geographical location *intended* by the user to trigger the display of, e.g., the respective reminder text in real-time by the location-based reminder function when a contemporaneous location of the communication device (and therefore the user) matches with the pre-set geographical location. Thereafter, the terms “the associated location” and “the intended location” may be used interchangeably to refer to that “the intended location” becomes “the associated location” after the Necessary GPS-setting Element (as to the displayed reminder entry) is materialized.

be pre-set (i.e., pre-stored in a volatile or non-volatile memory of the communication device) to be associated with the respective reminder text before the reminder function (as to that reminder entry) can and will be achieved. That is, one *necessary* element of a scheme that achieves the above-described reminder function on a respective location-based reminder entry is *pre-setting* a set of GPS coordinates of an associated location (associated with the respective reminder text) as to a host reminder entry. Hereinafter, this necessary element would be referred to as “the Necessary GPS-Setting Element.”

13. The Asserted Patent is particularly related to the Necessary GPS-Setting Element of a location-based reminder method/scheme (i.e., a method/scheme that achieves a location-based reminder function on a pre-set location-based reminder entry). More specifically, the Asserted Patent claims a location-based reminder method which uses a remotely located geo-code database (through a remote server) in a specific manner to advantageously materialize the Necessary GPS-Setting Element (i.e., manage to preset a set of GPS coordinates of an associated geographical location with a respective reminder text, as to a displayed reminder entry).

14. That above-stated *specific manner* as claimed includes, *inter alia*, one or more user-interfaces (which includes one or more specific user-interface elements) *specifically* designed to enable the user to input via text one or more identifiers that collectively uniquely identify a geographical location (intended by the user to be associated with the respective reminder text), *as specifically taught in the specification of the Asserted Patent*, so that the communication device ends up receiving, from the remotely located geo-code database, a set of GPS coordinates of the intended geographical location (which is uniquely identified by the one or more inputted identifiers) and subsequently using the received set of GPS coordinates to materialize the Necessary GPS-Setting

Element (i.e., manage to preset the received set of GPS coordinates as the set of GPS coordinates of the associated location with the respective reminder text, as to the displayed reminder entry).

### **THE PRIOR ART OF THE ASSERTED PATENT**

15. In the first aspect about prior art, an above-described location-based reminder, as a concrete end objective, was already in the prior art at the time of the March 11, 2008 priority date of the Asserted Patent. For example, the prior art reference Blass et al. (U.S. Published Patent Application 2006/0058948 – hereinafter “Blass”), which was published *two years prior to* the priority date of the Asserted Patent, disclosed such a location-based reminder scheme available in a smart communication device with, *inter alia*, an on-board GPS module and a user-interface-enabled display.

16. As to the Necessary GPS-Setting Element, Blass’s location-based reminder scheme uses an approach that is rather burdensome, and thus disadvantageous, as conceivable from a user’s standpoint nowadays. Blass’s scheme *requires* that a user be contemporaneously physically at the intended location with his/her communication device (having an on-board GPS module) on hand when materializing (i.e., performing) the Necessary GPS-Setting Element as to a particular location-based reminder entry in the communication device, or the Necessary GPS-Setting Element simply *cannot* be materialized (i.e., the set of GPS coordinates of the associated location as to that particular reminder entry simply *cannot* be set).

17. According to Blass’s teaching, while the user and the communication device are physically at the intended location, the communication device *first* contemporaneously captures the set of GPS coordinates of the intended location through its on-board GPS module, and then *pre-set* the captured set of GPS coordinates as the set of GPS-coordinates of the associated (intended) location

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