

EXHIBIT 30

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7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 LIFE360, INC.,

13 Plaintiff,

14 v.

15 ADVANCED GROUND INFORMATION
16 SYSTEMS, INC.,

17 Defendant.
18

Case No. 4:15-cv-00151

**FIRST AMENDED COMPLAINT FOR
FALSE MARKING, TORTIOUS
INTERFERENCE WITH CONTRACT,
INTENTIONAL INTERFERENCE WITH
ECONOMIC ADVANTAGE, AND UNFAIR
COMPETITION**

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DEMAND FOR JURY TRIAL

1 NOW COMES Plaintiff Life360, Inc. (“Life360”), by and through its counsel, bringing
2 this action against Defendant Advanced Ground Information Systems, Inc. (“AGIS”), alleging as
3 follows:

4 1. This is a civil action seeking remedies for false patent marking under 35 U.S.C.
5 § 292, tortious interference with contract, tortious interference with prospective economic
6 advantage and relations, and unfair competition.

7 **PARTIES**

8 2. Life360 is a business existing and organized under the laws of the State of
9 Delaware with a principal place of business of 539 Bryant Street, Suite 402, San Francisco,
10 California, 94107.

11 3. AGIS is a business existing and organized under the laws of the State of Florida
12 with a principal place of business at 92 Lighthouse Dr., Jupiter, Florida, 33469.

13 4. On information and belief, AGIS conducts business in this District. Life360 is a
14 resident of this District and has been harmed in this District.

15 **JURISDICTION AND VENUE**

16 5. The Court has jurisdiction under 28 U.S.C. §§ 1331, 1338(a), and 1367.

17 6. The Court has personal jurisdiction over the Defendant, and venue in this District is
18 proper under 28 U.S.C. § 1391(b). On information and belief, AGIS conducts business in this
19 District. Furthermore, AGIS engaged in tortious conduct directed to harm residents of this
20 District, and has purposefully directed its activities to the State of California and/or purposefully
21 availed itself of this jurisdiction. Venue is proper in this District because, inter alia, a substantial
22 part of the events and omissions giving rise to the claims occurred here, and because AGIS is
23 subject to personal jurisdiction in this District.

24 **INTRADISTRICT ASSIGNMENT**

25 7. Assignment to this division is proper pursuant to Local Rule 3-2(c) and (e) because
26 this action arises in the County of San Francisco as a substantial part of the events or omissions
27 which give rise to the claims occurred in the County of San Francisco.
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1 **STATEMENT OF THE FACTS**

2 8. Life360 is a company that makes mobile software applications for connecting
3 families. Life360 makes a “mobile app” entitled Life360 Family Locator for Android, iPhone, and
4 Windows mobile platforms, and makes this software and related services freely available to the
5 public. Using the Life360 Family Locator software, family members can view each other’s
6 locations on a map.

7 9. AGIS is a company that owns several patents and is in the business of providing
8 software for military, first responder, and law enforcement purposes. *See* <http://www.agisinc.com>
9 (last visited December 21, 2014). AGIS sells a software product called LifeRing for platforms
10 including, but not limited to, the Android operating system (“the LifeRing products”). *See id.*

11 10. On May 13, 2014, AGIS, through its attorneys Kenyon & Kenyon, LLP, sent a
12 cease and desist letter to Life360 accusing it of infringing at least four (4) patents and demanding a
13 response within three (3) days (“the Demand Letter”). A copy of this letter is attached as
14 Exhibit 1.

15 11. In the Demand Letter, AGIS accused Life360 of infringing U.S. Patent
16 No. 7,031,728 (“the ‘728 Patent”), U.S. Patent No. 7,672,681 (“the ‘681 Patent”), U.S. Patent
17 No. 7,764,954 (“the ‘954 Patent”), and U.S. Patent No. 8,126,441 (“the ‘441 Patent”)
18 (collectively, “the Asserted Patents”). A copy of the ‘681 Patent is attached as Exhibit 3, and a
19 copy of the ‘441 Patent is attached as Exhibit 4.

20 12. In the Demand Letter, AGIS broadly contended that the Asserted Patents cover
21 basic concepts such as showing the locations of users and “facilitating rapid communication
22 among them,” “enabling a user to change his profile across a network of users,” “allowing maps to
23 be downloaded from a network server,” and “establishing a polling network among groups of
24 users.” *See* Exhibit 1.

25 13. On May 16, 2014, AGIS sued Life360 for alleged patent infringement in the
26 U.S. District Court for the Southern District of Florida, accusing Life360 of infringing the
27 Asserted Patents (“the AGIS Complaint”). A copy of the AGIS Complaint (without exhibits) is
28 attached as Exhibit 2.

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