

EXHIBIT 4

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.

ADVANCED GROUND INFORMATION
SYSTEMS, INC.,

Plaintiff.

JURY TRIAL DEMANDED

vs

LIFE360, INC.,

Defendant.

**PLAINTIFF ADVANCED GROUND INFORMATION SYSTEMS, INC.'S
COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Advanced Ground Information Systems, Inc., through its attorneys, for its complaint against defendant Life360, Inc., alleges as follows:

STATEMENT OF JURISDICTION

1. This action arises under the patent laws of the United States, Title 35 of the United States Code, including 35 U.S.C. §§ 271 and 281.

NATURE OF THE ACTION

2. This is a patent infringement action to stop Life360, Inc.'s ("Life360") willful infringement of Advanced Ground Information System, Inc.'s ("AGIS") United States Patent No. 7,031,728 entitled "Cellular Phone/PDA Communication System" (hereinafter "the '728 Patent"; a copy of which is attached hereto as Exhibit A), United States Patent No. 7,764,954 entitled "Method of Providing Cell Phones in a Cell Phone Signal Strength Chart of Multiple Cell Phones in a Communication Network" (hereinafter "the '954 Patent"; a copy of which is attached hereto as Exhibit B), United States Patent No. 8,126,441 entitled "Method of

Establishing a Cell Phone Network of Participants with a Common Interest” (hereinafter “the ’441 Patent”; a copy of which is attached hereto as Exhibit C); and United States Patent No. 7,672,681 entitled “Method of Renaming Soft Switch Controls in all Participant’s Cell Phones by an Administrator” (hereinafter “the ’681 Patent”; a copy of which is attached hereto as Exhibit D) (collectively, the “Patents-in-Suit”). AGIS is the owner of the Patents-in-Suit and seeks injunctive relief and monetary damages.

THE PARTIES

3. Plaintiff AGIS is a limited liability company organized and existing under the laws of the State of Florida with a principal place of business at 92 Lighthouse Drive, Jupiter, Florida, 33469.

4. On information and belief, Life360 is a corporation organized and existing under the laws of the State of Delaware with a principal place of business at 539 Bryant Street, Suite 402, San Francisco, California, 94107.

JURISDICTION AND VENUE

5. This Court has Federal subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1338(a) because it arises under the patent laws of the United States, Title 35 of the United States Code, as it alleges acts of patent infringement.

6. This Court has personal jurisdiction over Life360. On information and belief, Life360 either directly or indirectly through one or more of its subsidiaries, affiliates, partners, or other related parties, has conducted and/or continues to conduct business within the State of Florida, including the Southern District of Florida. On information and belief, Life360 has and/or does now, directly or through intermediaries (including distributors, retailers, and others) ship, distribute, offer for sale, sell, advertise, operate, use and/or direct the operation and use of

its Life360 smartphone software application in the United States, the State of Florida, and the Southern District of Florida. For example, on information and belief, Life360 has caused the Life360 smartphone software application to be downloaded and used by residents in the Southern District of Florida through smartphone application stores such as the Google Play Store. On information and belief, Life360 operates a website that provides instructions on how to use its Life360 smartphone software application in an infringing manner. On information and belief, this website is accessible to and has been accessed by residents of the Southern District of Florida.

7. AGIS's main place of business is in the state of Florida.

8. On information and belief, venue in this judicial district is proper under 28 U.S.C. §§ 1391 and 1400(b).

**MALCOLM K. "CAP" BEYER JR.'S INVENTIONS AND
LIFE360'S CONTINUING WILLFUL INFRINGEMENT**

9. AGIS is a Florida-based military contractor, software developer, and technology company. Malcolm K. "Cap" Beyer, Jr., a graduate of the United States Naval Academy and a former Marine, is the company's CEO and the named inventor of the AGIS patent portfolio. Mr. Beyer founded AGIS shortly after the September 11, 2001, terrorist attacks because he realized that many first-responder and civilian lives were lost that day, in part, because of poor communications systems. He envisioned and developed a new system that would use PDAs and cell phones to give users situational awareness superior to that provided by conventional military and first-responder radio systems.

10. AGIS developed prototypes that matured into its LifeRing™ system. LifeRing™ provides first responders, law enforcement, and military personnel with what is essentially a tactical operations center built into hand-held or notebook-sized form factors. Using GPS-based

location technology and existing or special-purpose cellular communications networks, LifeRing™ users can exchange location, heading, speed, and other information with other members of their group, see each other's locations superimposed onto onscreen maps and satellite images, and rapidly communicate and coordinate their efforts. The system also interfaces with military command-and-control systems, such as GCCS, JCR, AFATDS, C2PC, and FBCB2.

11. On May 13, 2014, AGIS, through its attorneys, sent a letter to Mr. Chris Hulls, the Chief Executive Officer of Life360 Inc. ("Life360"). In that letter, AGIS identified the Patents-in-Suit, and described how Life360's smartphone software application, entitled "Life360" (hereinafter "the Life360 smartphone software application"), is described by claims therein. AGIS invited Life360 to discuss a patent licensing arrangement. Life360 responded to AGIS's invitation as follows:

Dear Piece of Shit,

We are currently in the process of retaining counsel and investigating this matter. As a result, we will not be able to meet your Friday deadline. After reviewing this matter with our counsel, we will provide a prompt response.

I will pray tonight that karma is real, and that you are its worthy recipient,

Chris

Upon information and belief, Life360 has continued to infringe AGIS's patents.

12. Life360 makes, sells, and distributes products, including the Life360 smartphone software application, with which it has infringed and continues to infringe AGIS's patents, directly and indirectly. On information and belief, Life360 has been distributing and/or selling location based smartphone software since 2008, and its software is being used by tens of millions

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