

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SLYDE ANALYTICS LLC,	)	
	)	Case No.
	)	
Plaintiff,	)	<b><u>JURY TRIAL DEMANDED</u></b>
	)	
v.	)	
	)	
GARMIN LTD. and GARMIN	)	
CORPORATION,	)	
	)	
Defendants.	)	

**COMPLAINT FOR PATENT INFRINGEMENT**

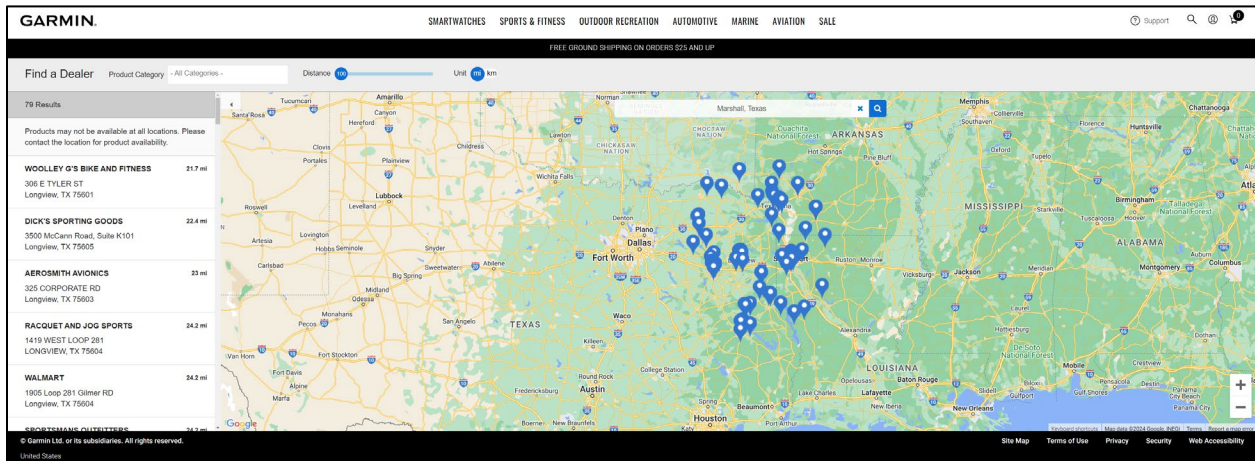
Plaintiff Slyde Analytics LLC (“Slyde” or “Plaintiff”) for its Complaint against Defendants Garmin Ltd. and Garmin Corporation (collectively, “Garmin” or “Defendants”) for patent infringement, alleges as follows:

**THE PARTIES**

1. Slyde is a limited liability company organized and existing under the laws of the State of Texas, with its principal place of business located at 104 East Houston Street, Suite 170, Marshall, Texas 75670.

2. Defendant Garmin Ltd. is a corporation organized and existing under the laws of Switzerland, with a principal place of business located at Mühlentalstrasse 2, 8200 Schaffhausen, Switzerland. Garmin Ltd. is one of the leading smartwatch sellers in the United States and the world. Upon information and belief, Garmin Ltd. does business in Texas, directly or through intermediaries, and offers its products and/or services, including those accused herein of infringement, to customers and potential customers located in Texas, including in the Judicial District of the Eastern District of Texas. For example, Garmin Ltd. has authorized dealers of its

goods and services located throughout Texas, including in the Judicial District of the Eastern District of Texas. Moreover, Garmin advertises and directs customers and end-users to its dealers on its website. Specifically, Garmin goods and services are offered for sale in at least the following locations within this Judicial District: 306 East Tyler Street, Longview, Texas 75601; 3500 McCann Road, Suite K101, Longview, Texas 75601; 325 Corporate Road, Longview Texas, 75603; 1419 West Loop 281, Longview Texas 75604; 1905 Loop 281 Gilmer Road, Longview, Texas 75604; 320 West Panola Street, Carthage, Texas 75633; and One Skeeter Road, Kilgore, Texas 75662; among other locations.<sup>1</sup>



3. Defendant Garmin Corporation is a corporation organized and existing under the laws of Taiwan, with a principal place of business located at No. 68, Zhangshu 2nd Road, Xizhi District, New Taipei City 221, Taiwan. Garmin Corporation is a wholly-owned subsidiary of Garmin Ltd. Upon information and belief, Garmin Corporation is responsible for the manufacturing of Garmin products in China and Taiwan, including smartwatches. Upon information and belief, Garmin Corporation distributes Garmin products, such as smartwatches,

<sup>1</sup> See <https://www.garmin.com/en-US/dealerlocator> (Garmin dealers within 100 miles of Marshall, Texas.)

to other Garmin subsidiaries and/or authorized Garmin Dealers, including in the United States. According to Garmin Ltd.'s 2023 10-K Form filed with the Securities and Exchange Commission, "Garmin Corporation (GC) is primarily responsible for the manufacturing and distribution of the Company's products to the Company's subsidiaries [...]"<sup>2</sup> Moreover, the facilities owned, occupied, or leased by Garmin Corporation in Taiwan "are used for the manufacturing and warehousing of most of Garmin's **fitness, outdoor**, and marine products, as well as portable aviation products and some Auto OEM products." (emphasis added).<sup>3</sup> The accused products herein are part of Garmin's fitness and outdoor product lines.<sup>4</sup> Upon information and belief, Garmin Corporation does business in Texas, directly or through intermediaries, and offers its products and/or services, including those accused herein of infringement, to customers and potential customers located in Texas, including in the Judicial District of the Eastern District of Texas.

### JURISDICTION

4. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has specific and personal jurisdiction over Defendants consistent with the requirements of the Due Process Clause of the United States Constitution and the Texas Long Arm Statute due at least to their substantial business in the State of Texas and in this Judicial District, including (a) its past and continuing infringing activities, whether direct acts or through

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<sup>2</sup> See Garmin Ltd.'s 2023 10-K Form at 52, available at: [https://www8.garmin.com/aboutGarmin/invRelations/reports/2023\\_10-K.pdf](https://www8.garmin.com/aboutGarmin/invRelations/reports/2023_10-K.pdf)

<sup>3</sup> *Id.* at 28.

<sup>4</sup> See, e.g., <https://www.garmin.com/en-US/c/sports-fitness/activity-fitness-trackers/>

subsidiaries or intermediaries, induced acts of patent infringement by others in the State of Texas and in this Judicial District, and/or contributed to acts of patent infringement by others in the State of Texas and in this Judicial District, as alleged in this Complaint; (b) regularly doing or soliciting business in Texas; and/or (c) engaging in persistent conduct and/or deriving substantial revenue from goods and services provided to customers in Texas. Upon information and belief, Defendants, directly and indirectly, participate in the stream of commerce that results in products, including the accused products, being made, used, offered for sale, and/or sold in the State of Texas and/or imported into the United States to the State of Texas.

6. Venue is proper in this Judicial District as to Defendants pursuant to 28 U.S.C. § 1391 because, among other things, Defendants are not residents in the United States, and thus may be sued in any judicial district pursuant to 28 U.S.C. § 1391(c)(3). Defendants, through their own acts and/or through the acts of its subsidiaries or agents, make, use, sell, and/or offer to sell infringing products within this Judicial District, regularly do and solicit business in this Judicial District, and have the requisite minimum contacts with the Judicial District such that this venue is a fair and reasonable.

#### **PATENTS-IN-SUIT**

7. On November 19, 2013, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,588,033 (the “’033 Patent”) entitled “Wristwatch with Electronic Display”. A true and correct copy of the ’033 Patent is available at: <https://patentimages.storage.googleapis.com/07/3c/fe/2030932c07dec3/US8588033.pdf>.

8. On May 16, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,651,922 (the “’922 Patent”) entitled “Wristwatch with a Touch Screen and Method for Displaying on a Touch-Screen Watch”. A true and correct copy of the ’922 Patent

is available at:  
<https://patentimages.storage.googleapis.com/46/41/aa/e6cf42c43ea6fd/US9651922.pdf>.

9. On October 31, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,804,678 (the “’678 Patent”) entitled “Method and Circuit for Switching a Wristwatch from a First Power Mode to a Second Power Mode”. A true and correct copy of the ’678 Patent is available at:  
<https://patentimages.storage.googleapis.com/66/75/da/3c1794bd793023/US9804678.pdf>.

10. On February 5, 2019, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,198,085 (the “’085 Patent”) entitled “Method and Circuit for Switching a Wristwatch from a First Power Mode to a Second Power Mode”. A true and correct copy of the ’085 Patent is available at:  
<https://patentimages.storage.googleapis.com/2f/74/71/1b183d01f4d6c0/US10198085.pdf>.

11. On April 26, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,320,457 (the “’457 Patent”) entitled “Integrated Portable Deice and Method Implementing an Accelerometer for Analyzing Biomechanical Parameters of a Stride”. A true and correct copy of the ’457 Patent is available at:  
<https://patentimages.storage.googleapis.com/00/6c/f0/d788ae39a5f931/US9320457.pdf>.

12. On January 23, 2018, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,873,018 (the “’018 Patent”) entitled “Integrated Portable Deice and Method Implementing an Accelerometer for Analyzing Biomechanical Parameters of a Stride”. A true and correct copy of the ’018 Patent is available at:  
<https://patentimages.storage.googleapis.com/8e/51/b7/79c6a81c80a7e0/US9873018.pdf>.

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