

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

FLEET CONNECT SOLUTIONS LLC,

Plaintiff,

v.

XIRGO TECHNOLOGIES, LLC; XIRGO
HOLDINGS, INC.

Defendants.

Civil Action No. 2:25-cv-00837-JKW-RJK

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Fleet Connect Solutions LLC (“Fleet Connect” or “Plaintiff”) files this First Amended Complaint against Defendants Xirgo Technologies, LLC and Xirgo Holdings, Inc. (collectively, “Defendants”) alleging, based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

NATURE OF THE ACTION

1. This is a patent infringement action to stop Defendants’ infringement of the following United States Patents (collectively, the “Asserted Patents”), issued by the United States Patent and Trademark Office (“USPTO”):

	Patent No.	Title	Reference
1.	7,741,968	System And Method for Navigation Tracking of Individuals in a Group	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7741968
2.	6,941,223	Method And System For Dynamic Destination Routing	https://ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6941223
3.	7,206,837	Intelligent Trip Status Notification	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7206837
4.	9,299,044	System And Methods For Management Of Mobile Field Assets Via Wireless Handheld Devices	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/9299044

	Patent No.	Title	Reference
5.	9,747,565	System And Methods For Management Of Mobile Field Assets Via Wireless Handheld Devices	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/9747565
6.	10,671,949	System And Methods For Management Of Mobile Field Assets Via Wireless Handheld Devices	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/10671949
7.	6,549,583	Optimum Phase Error Metric for OFDM Pilot Tone Tracking in Wireless LAN	https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/6549583

2. Plaintiff seeks monetary damages.

PARTIES

3. Plaintiff is a limited liability company formed under the laws of Texas with its registered office address located in Austin, Texas.

4. Based upon public information, Defendant Xirgo Technologies, LLC is a limited liability company organized under the laws of Delaware and is headquartered at 2100 Golf Road, Suite 290, Rolling Meadows, IL 60008.

5. Based upon public information, Xirgo Technologies, LLC may be served through its registered agent at Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808.

6. Based upon public information, Defendant Xirgo Holdings, Inc. is a corporation organized under the laws of Indiana and is headquartered at 2100 Golf Road, Suite 290, Rolling Meadows, IL 60008.

7. Based upon public information, Xirgo Holdings, Inc. may be served through its registered agent at Corporation Service Company, 135 North Pennsylvania Street, Suite 1610, Indianapolis, IN 46204.

8. Based upon public information and belief, Xirgo Technologies, LLC and Xirgo Holdings, Inc. are affiliated companies. *See Privacy Notice*, XIRGO (last visited Oct. 30, 2025),

<https://xirgo.com/privacy-policy/>.

9. Based upon public information, Defendants have a place of business at 12110 Sunset Hills Rd, Suite 600, Reston, VA 20190. *See Find Us Worldwide*, XIRGO <https://xirgo.com/contact/locations/> (last visited Nov. 14, 2025).

JURISDICTION AND VENUE

10. Fleet Connect repeats and re-alleges the allegations in Paragraphs 1-9 above as though fully set forth in their entirety.

11. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject matter jurisdiction of the action under 28 U.S.C. § 1331 and § 1338(a).

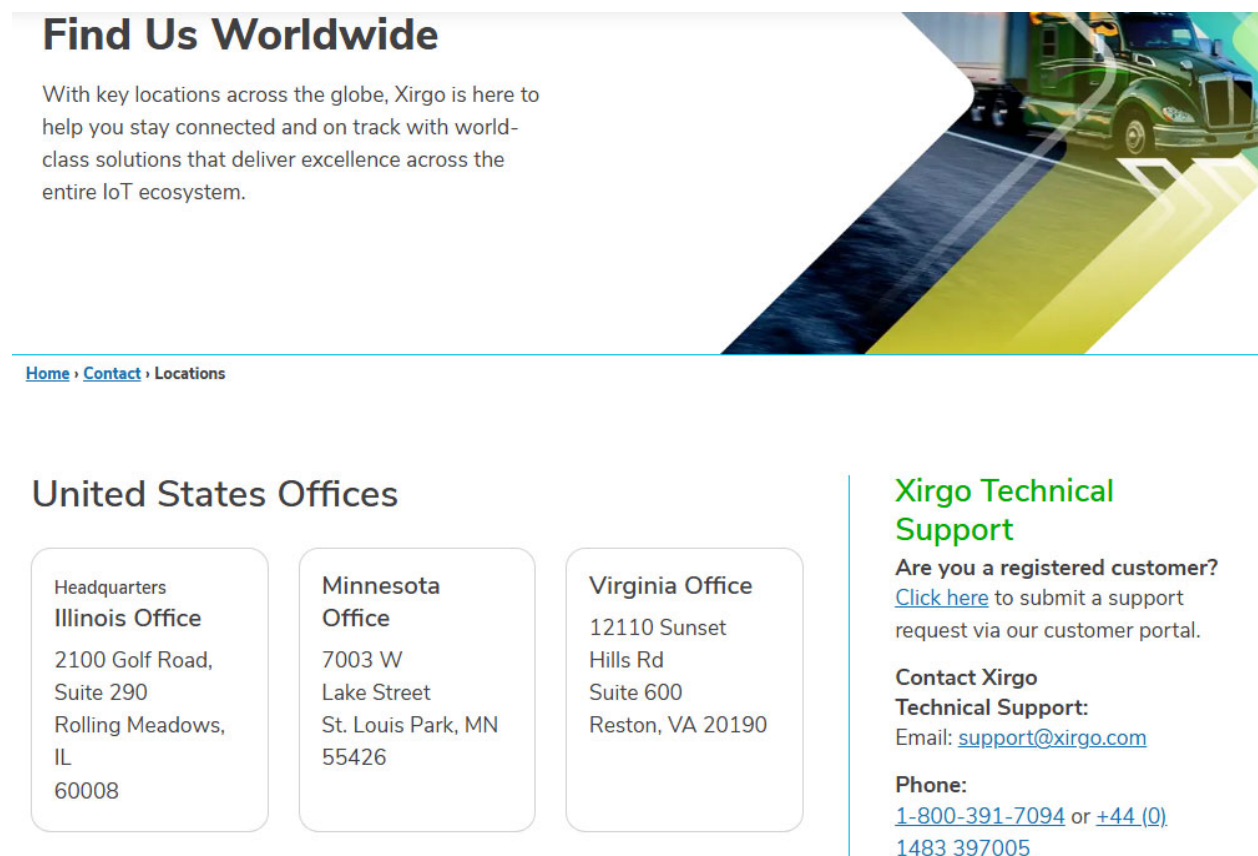
12. Venue is proper against Defendants in this District pursuant to 28 U.S.C. §§ 1400(b) and 1391(c) because Defendants have maintained an established and regular place of business in this District and have committed acts of patent infringement in this District from that regular and established place of business. *See In re: Cray Inc.*, 871 F.3d 1355, 1362-63 (Fed. Cir. 2017).

13. Defendants offer products and services, including through the use of the Accused Products defined below, and conduct business in this District.

14. Defendants are subject to this Court’s specific and general personal jurisdiction under due process because of Defendants’ substantial business in this District, including: (i) at least a portion of the infringements alleged herein; (ii) regularly transacting, doing, and/or soliciting business, engaging in other persistent courses of conduct, or deriving substantial revenue from goods and services provided to individuals in Virginia and this District; (iii) having an interest in, using, or possessing real property in this District; and (iv) having and keeping personal property in Virginia and in this District.

15. Specifically, Defendants intend to do and do business in, have committed acts of infringement in this District directly, through intermediaries, and offer their products or services, including those accused of infringement here, to customers and potential customers located in this state, including in this District, and in the United States.

16. On public information and belief, as discussed above, Defendants own, operate, manage, conduct business, and direct and control the operations and employees of facilities at a location in this District, including, but not limited to, 12110 Sunset Hills Rd, Suite 600, Reston, VA 20190. *See* ¶ 9, *supra*; *see also* Figure 1, *infra*.



Find Us Worldwide

With key locations across the globe, Xirgo is here to help you stay connected and on track with world-class solutions that deliver excellence across the entire IoT ecosystem.

[Home](#) • [Contact](#) • [Locations](#)

United States Offices

Headquarters Illinois Office	Minnesota Office	Virginia Office
2100 Golf Road, Suite 290 Rolling Meadows, IL 60008	7003 W Lake Street St. Louis Park, MN 55426	12110 Sunset Hills Rd Suite 600 Reston, VA 20190

Xirgo Technical Support

Are you a registered customer?
[Click here](#) to submit a support request via our customer portal.

Contact Xirgo Technical Support:
Email: support@xirgo.com

Phone:
[1-800-391-7094](tel:1-800-391-7094) or [+44 \(0\) 1483 397005](tel:+44-01483-397005)

Figure 1, available at <https://xirgo.com/contact/locations/>.

17. Defendants direct and control all activities of their United States offices, including any affiliate companies that work out of any of Defendants' United States offices.

18. Defendants offer products and services and conduct business in this District as described in further detail below.

19. Defendants ship and cause to be shipped into this District infringing products and materials instructing their customers to perform infringing activities and/or to their employees, exclusive and non-exclusive contractors, agents, and affiliates for installation, operation, and service at locations within this District

20. Defendants market, sell, and deliver accused products in this District, and have committed acts of infringement in this District.

THE ACCUSED PRODUCTS

21. Fleet Connect repeats and re-alleges the allegations in Paragraphs 1-20 above as though fully set forth in their entirety.

22. Based upon public information, Defendants make, sell, offer for sale, use, cause to be used, provide, supply, distribute, and/or import Xirgo's transportation solution which incorporates a fleet management platform and tracking solutions, including but not limited to:

- (a) all in-cab tablets, smartphones, laptops, computers, and/or devices provided by Xirgo to drivers and all Electronic Logging Device Systems ("ELDs") that those devices are in communication with, as the term ELDs is used by the USDOT, FMCSA, and/or mandated as part of MAP-21 that commercial motor vehicle operators must use (*see* <https://eld.fmcsa.dot.gov/>) including, but not limited to, In-Vehicle Display Tablets (ELD Tablets), Xirgo Telematics Devices (e.g., XT6300, XT2500, XT6264, XG3700, XT2400, XT2100, XT2180, XT5273A, FMS500 Light, FMS500 Light+, FMS500 STCAN, FMS500 TACHO, XT4964, Xirgocam XT-BB-22, XG3780 SDK 4G (e.g., XG3780U00C1, XG3780U00C2, XG3780U00C3, XG3780U00C4, and XG3780U00C5),

XT4500, XT4900, XT4700, XT3100, XG3700 XTCAN SDK, XG3700 LIGHT SDK, XG3700 LIGHT+ SDK, XG3700 STCAN SDK, and XG3700 TACHO SDK), Xirgo Fleet Management application/software/website, Xirgo Global Logistics application/software/website, Xirgo Asset Telematics (Xirgo Asset Monitoring & Control), Xirgo Driver app (e.g., Xirgo Global Logistics app), and any other similar devices applications, and/or instrumentalities;

- (b) all Asset Tracking Devices including, but not limited to, the XT6300, XT2500, XT6264, XG3700, XT2400, XT2100, XT2180, XT5273A, FMS500 Light, FMS500 Light+, FMS500 STCAN, FMS500 TACHO, XT4964, Xirgocam XT-BB-22, XG3780 SDK 4G (e.g., XG3780U00C1, XG3780U00C2, XG3780U00C3, XG3780U00C4, and XG3780U00C5), XT4500, XT4900, XT4700, XT3100, XG3700 XTCAN SDK, XG3700 LIGHT SDK, XG3700 LIGHT+ SDK, XG3700 STCAN SDK, and XG3700 TACHO SDK, or any product, service, device, or instrumentality that supports tracking, routing, monitoring, maintenance, messaging, workflow, and compliance for vehicles, cabs, trailers, containers, and equipment and that communicates using GNSS/GPS, and/or 4G/LTE and their various subsections and functionally similar protocols or standards;
- (c) any relevant Fleet Management Software/Application/Website/Platform/Portal that provides, processes, and/or displays routing, location, tracking, status information, vehicle alerts or information, or driver alerts or information from or to any of the devices described in (a)-(b) above;
- (d) other substantially similar products and services offered in the past or the future, and
- (e) all of the prior models, iterations, releases, versions, generations, and prototypes of the foregoing, along with any associated hardware, software, applications, and functionality

associated with those products and solutions. *See Exhibits A-G* (Evidence of Use Regarding Infringement of the Asserted Patents).

23. Defendants own, operate, advertise, and/or control at least the website <https://xirgo.com/> through which they advertise, sell, offer to sell, promote, provide and/or educate customers about their products, including the Accused Products.

24. For these reasons and the additional reasons detailed below, the Accused Products practice at least one claim of each of the Asserted Patents.

25. Fleet Connect hereby incorporates by reference in this operative complaint the entirety of the Declaration of Dr. Steven H. Goldberg, which is attached as Exhibit 1 (“Goldberg Decl.”)

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 7,741,968

26. Fleet Connect repeats and re-alleges the allegations in Paragraphs above as though fully set forth in their entirety.

27. The USPTO duly issued U.S. Patent No. 7,741,968 (the “’968 patent”) on June 22, 2010, after full and fair examination of Application No. 12/143,707, which was filed on June 20, 2008. The ’968 patent is entitled “System and Method for Navigation Tracking of Individuals in a Group.”

28. Fleet Connect owns all substantial rights, interest, and title in and to the ’968 patent, including the sole and exclusive right to prosecute this action and enforce the ’968 patent against infringers and to collect damages for all relevant times.

29. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the ’968 patent.

30. The claims of the ’968 patent are not directed to an abstract idea and are not limited to

well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of preexisting data transmission methods.

31. The written description of the '968 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

32. Defendants have directly infringed one or more claims of the '968 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

33. Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 4 of the '968 patent, as detailed in **Exhibit A** (Evidence of Use Regarding Infringement of U.S. Patent No. 7,741,968).

34. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II: INFRINGEMENT OF U.S. PATENT NO. 6,941,223

35. Fleet Connect repeats and re-alleges the allegations in above as though fully set forth in their entirety.

36. The USPTO duly issued U.S. Patent No. 6,941,223 (the "'223 patent") on September 6, 2005, after full and fair examination of Application No. 10/339,663, which was filed on January

10, 2003. The '223 patent claims priority to German application No. 10200759, filed on January 10, 2002.

37. Fleet Connect owns all substantial rights, interest, and title in and to the '223 patent, including the sole and exclusive right to prosecute this action and enforce the '223 patent against infringers and to collect damages for all relevant times.

38. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '223 patent.

39. The written description of the '223 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

A. THE TECHNICAL PROBLEMS IN USING CONVENTIONAL NAVIGATION SYSTEMS IN JANUARY 2002.

40. In general, the '223 patent is directed to a system for the dynamic destination routing of vehicles. '223 patent at 1:11-12. Goldberg Decl., ¶ 33. Notably, at the priority date of these patents, navigation systems faced a number of limitations related to how they handled traffic data and how they interacted with the driver. *Id.* at ¶34. For example, the '223 patent identifies four limitations in these prior art systems. *Id.*

41. First, prior systems often relied on a single source of information or failed to reconcile data from different sources. '223 patent at 1:41-55; 2:23-33; Goldberg Decl., ¶ 35. This led to contradictions, where a system might provide instructions that contradicted the driver's "direct on-site perception" (e.g., telling a driver a road is clear when they are sitting in a visible traffic jam).

Id. Data from a single source could also be outdated, leading to poor route recommendations. *Id.*

42. Second, a major “human-factor” technical problem was the “black box” nature of older systems. ’223 patent at 1:56-62; 2:14-23; 2:33-42; 2:66-3:5; Goldberg Decl., ¶ 36. Drivers were often redirected or kept on a congested route without knowing why. *Id.* This in turn would lead to lower acceptance of recommendations. *Id.* If a driver didn’t understand the logic behind a recommendation (such as why the system isn’t suggesting an alternative during a jam), the driver was likely to ignore the system or find it untrustworthy. *Id.*

43. Third, prior art systems (like those in EP 0 838 797 A1 and DE 199 56 108 A1) typically calculated an alternative route only when a hindrance occurred. ’223 patent at 1:13-62; 1:63-2:13; 2:43-65; Goldberg Decl., ¶ 37. They lacked constant self-diagnosis and proactive querying. They did not continuously verify if the “optimal” route was still optimal based on actual driving progress (speed and distance) versus predicted progress. They also generally reacted to received data rather than actively requesting updated, detailed information when approaching a known problem area.

44. Fourth, the ’223 patent highlighted a structural problem with how navigation systems were built. ’223 patent at 2:6-40; Goldberg Decl., ¶ 38. For example, systems fixed in a vehicle are difficult and expensive to upgrade. *Id.* Because traffic data services and software algorithms change rapidly, car-bound hardware becomes obsolete quickly. *Id.* In addition, updating software in a permanently installed vehicle computer involved higher expenditures compared to portable devices. *Id.*

B. THE CLAIMS OF THE ’223 PATENT PROVIDE TECHNICAL SOLUTIONS TO THE PROBLEMS WITH NAVIGATION SYSTEMS IN JANUARY OF 2002.

45. The ’223 patent contains 21 total claims (3 independent and 18 dependents, each of which include additional technical steps/limitations). Claim 19 and its dependent claims are

illustrated below to highlight the claim limitations that are directed to solving some of the then-existing technical problems in January 2002:

19. A method for destination routing of a vehicle, the method comprising the acts of:

determining, based on static information, an optimal route;

receiving additional information;

determining, based on a comparison of real travel parameters of the vehicle with travel parameters associated with the optimal route, whether the optimal route remains optimal; and

determining a new optimal route when the optimal route does not remain optimal, wherein the new optimal route is determined using the additional information,

wherein the travel parameters include at least one of travel time and traveled distance.

'223 patent, at claim 19 (emphasis added); Goldberg Decl., ¶ 39. The dependent claims to claim 19 are also illustrated below:

20. The method of claim 19, wherein *the determination of the optimal route and the new optimal route are performed within the vehicle.*

21. The method of claim 19, further comprising the act of:

outputting a source of the additional information, wherein the source of the additional information includes at least one of Radio Data System (RDS), RDS/Traffic Message Channel (RDS/TMC), control-center-supported services, internet-based and Wireless Application Protocol-based (WAP) services.

'223 patent, at claims 20-21 (emphasis added); Goldberg Decl., ¶ 39.

46. Although not reproduced above, independent method claims 1 and 15 are also each directed to subject matter that provide distinct technical solutions to the longstanding problems in vehicle navigation systems in January 2002. Goldberg Decl., ¶ 40. A POSITA would understand that by comparing these claims to each other. *Id.* For example, claim 1 recites a system that

proactively compares (performs a check) “real travel parameters” (how fast you are actually moving) against the “parameters used when determining the route” (how fast the system *thought* you would move). *Id.*

47. Claim 15 recites a system for the destination routing of a vehicle. Goldberg Decl., ¶ 41. Claim 15 teaches a hardware-based solution to the problem of technological obsolescence. *Id.* It solves the physical limitation of “fixed-in-dash” computers which, in 2002, had limited memory and processing power that could not be easily upgraded to handle complex new traffic algorithms. *Id.* In order to address this problem, claim 15 defines a specific structural relationship: a “first part fixedly installed” (e.g., handling GPS/sensors) and a “second portable part” (e.g., handling the dynamic re-computation). *Id.* This architecture allows the high-intensity processing (dynamic routing) to be offloaded to a device that the user can upgrade independently of the car’s 10-year lifespan. *Id.* Using a portable device to augment a factory-installed navigation system’s logic was a major departure from the “embedded-only” hardware standards of the era. *Id.* It solved the technical problem of the car’s hardware becoming obsolete faster than its engine. *Id.*

48. As another example, claim 19 of the ’223 patent provides at least three technical solutions to the “static data” and “unverified prediction” problems that plagued conventional vehicle navigation systems in the early 2000s. Goldberg Decl., ¶ 42. At that time, navigation units were largely reactive; they either followed a pre-calculated path or changed it only when they received a broadcasted traffic alert (like Radio Data System (RDS)- Traffic Message Channel (TMC)). *Id.*

49. The ’223 patent eliminates the “reality gap” problem. Goldberg Decl., ¶ 43. Early systems relied on “prognosticated” (predicted) traffic events. *Id.* If a system predicted a clear highway but the driver was actually stuck in a localized jam not yet reported by radio services, the

system remained “blind” and continued to recommend the congested route. *Id.* Claim 19 provides a specific technical solution to this problem, where the claim specifies determining if a route remains optimal based on a “comparison of real travel parameters...with travel parameters associated with the optimal route” and constantly checks if the vehicle’s “travel time and traveled distance” match the expected schedule. *Id.*

50. Second, claim 19 of the ’223 patent solved existing problems related to “stale data.” Goldberg Decl., ¶ 44. At the time, static routing was the norm. *Id.* If a route was calculated at the start of a trip, the system rarely re-interrogated the entire route’s validity unless a manual “re-route” was triggered by the user or a formal traffic flag. *Id.* Claim 19 provides a specific technical solution to this problem, where the claim mandates “determining a new optimal route when the optimal route does not remain optimal.” *Id.* This creates an automated trigger. *Id.* If the “real travel parameters” (the car is moving slower than expected) deviate from the “travel parameters associated with the optimal route,” the system self-corrects without driver intervention. *Id.*

51. Third, claim 19 of the ’223 patent solved existing problems related to the integration of “static” versus “additional” information. Goldberg Decl., ¶ 45. At the time, conventional systems often struggled to merge static map data with fragmented dynamic “additional” information (like Internet or WAP services) in a way that influenced the routing logic “mid-drive”. *Id.* Claim 19 provides a specific technical solution to this problem, where the method acts on “static information” to find the initial route but explicitly requires “receiving additional information” to determine the *new* optimal route. *Id.* This creates a hierarchy where the “additional information” (dynamic data) is the corrective lens through which the static map is re-evaluated during the drive. *Id.*

52. These claims provided specific improvements to conventional vehicle navigation

systems, which did not allow a mobile unit to continuously perform “self-diagnosis” comparing actual progress vs. predicted progress; pull from and compare multiple sources (RDS, Internet, WAP) to ensure data reliability and minimize contradictions; provide explanatory information (e.g., why no alternative was chosen); use “additional information” to override the static optimal route; and solve the problem of hardware obsolescence. Goldberg Decl., ¶ 46.

53. Each of these independent claims captures a different aspect of the technical solutions disclosed in the ’223 patent for improving vehicle navigation systems, addressing the prior arts’ inability to self-diagnosis and self-correct to ensure the optimal route is maintained. Goldberg Decl., ¶ 47.

54. The remaining dependent claims (claims 2-14, 16-18, 20-21) recite additional concrete technical limitations that further implement the use of additional data sources, hardware architecture, and mathematical parameters disclosed in the specification. Goldberg Decl., ¶ 48. These dependent claims recite additional technical requirements that further limit the independent claims. *Id.* Claim 2 focuses on data-driven triggers. *Id.* Unlike Claim 1 (which waits for a delay), this triggers a recalculation simply because new information has arrived from an external source, even if the vehicle is currently on time. *Id.* Claim 3 focuses on the optimization criterion. *Id.* It defines “optimal” strictly as the shortest traveling time, moving away from other metrics like “shortest distance.” *Id.* Claim 4 focuses on information type, narrowing the broad “additional information” of Claim 1 specifically to traffic information. *Id.* Claims 5 and 6 link the traffic data focus (Claim 4) to the triggers in Claim 2 and the time-optimization in Claim 3. *Id.* Claim 7 focuses on data fusion, where it requires the system to aggregate information from several different sources (e.g., matching radio data with internet data) to ensure accuracy. *Id.* Claim 8 focuses on data auditing, using the system to judge the quality and quantity of incoming data, and providing

that it won't re-route based on a "low quality" or vague signal. *Id.* Claim 9 focuses on context awareness, ensuring that the system looks specifically at data relevant to the residual route (the path still ahead of the car), rather than the whole map. *Id.* Claim 10 focuses on computational efficiency. *Id.* It triggers the determination of a residual route specifically, meaning the system only processes the vector from the current GPS position to the destination. *Id.* Claim 11 focuses on human-machine interface. *Id.* Its goal is "driver acceptance," and it mandates that the system output explanatory information so the driver understands why a detour is being suggested. *Id.* Claim 12 focuses on system architecture, and it introduces the physical split between a fixed part (built into the car) and a portable part (a handheld device) connected via a communication interface. *Id.* Claim 13 focuses on assigning static routing (map-matching) to the car's fixed computer installed on the vehicle and dynamic routing (live traffic logic) to the portable device. *Id.* Claim 14 narrows the "portable part" specifically to a mobile communication device (like a smartphone or PDA). *Id.*

55. Claim 16 ensures that the system is a real-time, low-latency companion. Goldberg Decl., ¶ 49. By requiring the portable part to be within the vehicle, the system can maintain a constant, high-speed data exchange with the vehicle's internal sensors (GPS and odometer) to perform the "self-diagnosis" mentioned in the earlier claims. *Id.* Claim 17 requires a specific signal-flow: the portable part calculates the route using "additional information," but the fixed car part (the dashboard screen) must output the specific source of that information (e.g., data from WAP-service or internet-based traffic update). *Id.*

56. Claim 18 specifically recites a wireless Bluetooth connection as the bridge between the fixed and portable parts. Goldberg Decl., ¶ 50. In January 2002, Bluetooth was an emerging technology. *Id.* Claiming its use for vehicle navigation logic was highly specific and solved the

technical hurdle of how a driver could “plug in” their portable intelligence without needing a physical wire, facilitating the “distributed computer” model. *Id.*

57. Claim 20 specifies that both the initial route determination and the new optimal route determination are “performed within the vehicle.” Goldberg Decl., ¶ 51. This requires the vehicle (or the portable device inside it) to possess enough onboard processing power and memory to handle complex routing algorithms locally, ensuring the system remains functional even in “dead zones.” *Id.* Similar to Claim 17, claim 21 requires the method to output the source of the data. *Id.* This provides a technical verification step—the system proves it is “optimal” by citing its evidence (e.g., “Updating route based on WAP-based traffic service”). *Id.*

58. A POSITA would understand that these are not meaningless or trivial differences. Goldberg Decl., ¶ 52. They are distinct technical operations, hardware requirements, and system level architectures that implement additional aspects of the invention disclosed in the ’223 patent. *Id.*

59. Given the differences among the claims of the ’223 patent (discussed above), it is incorrect to treat claim 19 as representative of all other claims. Goldberg Decl., ¶ 53. A POSITA would understand that this claim is not representative of the full scope of the claims in the ’223 patent. *Id.*

60. A POSITA would understand that these each of the claims are directed to much more than “receiving and analyzing data,” or any other abstract idea. Goldberg Decl., ¶ 54.

61. These claims are not directed at subject matter that can be performed by a human, mentally or with pen and paper. Goldberg Decl., ¶ 55. The claims in the patent, including claims 1, 15, and 19, accomplish something tangible in the computer world. *Id.* As explained above, the claims of the ’223 patent were directed at improving then-existing vehicle navigation systems and

are rooted in high-frequency, real-time data synchronization and distributed hardware interactions that are impossible for a human to replicate. *Id.* While a human can look at a watch and a map, they cannot perform the constant, sub-second “self-diagnosis” required by the claims. *Id.* The claims recite a “check” and “comparison” of real travel parameters (time and distance) against a stored digital model. *Id.* This requires a continuous data feed from the vehicle’s odometer and GPS—signals a human cannot “sense” with mathematical precision while driving. *Id.* The system can also recalculate the “optimal” status thousands of times during a trip based on millisecond-level updates, a frequency far beyond human mental capacity. *Id.* None of these steps could be performed by a human or with a pen and paper because the problems that were sought to be addressed by this patent were due to the inability of humans to pull from multiple data sources (WAP-based traffic service), physically calculate, record, and compare the vehicle’s exact odometer and GPS position against a predicted time-series model at the speed required for a moving vehicle, and provide an optimal route. *Id.*

62. Finally, the claims of the ’223 patent do not preempt all the ways of “receiving and analyzing data.” Goldberg Decl., ¶ 56. For instance, the prior art systems discussed in the ’223 patent, like those prior art systems that are cited (German Patent Document DE 19956 108 A1, for instance) can still be practiced. *Id.* The almost 20 prior art references disclosed on the face of the ’223 patent can be practiced without infringing on the claims of the ’223 patent. *Id.* (citing ’223 patent, at p. 1). There are a number of other ways such systems could be architected (*e.g.*, without dynamic routing) to track and communicate with drivers and without information derived from additional data sources. *Id.*

63. Even if the ’223 patent claims were directed at an abstract idea, which a POSITA would not agree with, the claims capture subject matter that is inventive. Goldberg Decl., ¶ 57. A

POSITA would understand that the claims of the '223 patent are directed to subject matter that was unknown in the art at the time. *Id.* To the extent that the claims employ components and technology that existed at the time (for instance, memory on board the vehicle, output unit, mobile communication device, communication interface, and external transmitting units) they are employed together here in a way that was new and would not have been considered conventional, routine, or generic to those skilled in the art. *Id.* The use of the in-vehicle navigation systems, such as those claimed in the independent claims, including claim 19, to first determine a route based on “static information,” then modifying it based on “additional information” and “real travel parameters” to improve then-existing vehicle navigation systems, was an unconventional use of existing technology that was not previously known in the art. *Id.*

64. Even if that were not true, the ordered combination of the elements in claims 1, 15, and 19 (especially coupled with their dependent claims) of the '223 patent, as recited and described in detail above, were not known in the art. Goldberg Decl., ¶ 58. A POSITA would not have been aware of any art or system that existed prior to the priority date of the '223 patent that taught the use of in-vehicle navigation systems to self-diagnose, self-correct, and dynamically integrate additional information in order to maintain the optimal route, as claimed in the various forms in the claims highlighted above. *Id.*

65. For the above reasons, the subject claims in the '223 patent recite a combination of elements sufficient to ensure that the claims in substance and in practice amount to significantly more than a patent-ineligible abstract idea, such as receiving and analyzing data. Goldberg Decl., ¶ 59.

INFRINGEMENT OF THE '223 PATENT

66. Defendants have directly infringed one or more claims of the '223 patent by making,

using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

67. Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 19 of the '223 patent, as detailed in **Exhibit B** (Evidence of Use Regarding Infringement of U.S. Patent No. 6,941,223).

68. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT III: INFRINGEMENT OF U.S. PATENT NO. 7,206,837

69. Fleet Connect repeats and re-alleges the allegations in Paragraphs above as though fully set forth in their entirety.

70. The USPTO duly issued U.S. Patent No. 7,206,837 (the "'837 patent") on April 17, 2007, after full and fair examination of Application No. 10/287,151, which was filed November 4, 2002.

71. Fleet Connect owns all substantial rights, interest, and title in and to the '837 patent including the sole and exclusive right to prosecute this action and enforce the '837 patent against infringers and to collect damages for all relevant times.

72. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the '837 patent.

73. The claims of the '837 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of voice and data

communications systems.

74. The written description of the '837 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

75. Defendants have directly infringed one or more claims of the '837 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

76. Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '837 patent, as detailed in **Exhibit C** (Evidence of Use Regarding Infringement of U.S. Patent No. 7,206,837).

77. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 9,299,044

78. Fleet Connect repeats and re-alleges the allegations in Paragraphs 1-59 above as though fully set forth in their entirety.

79. The USPTO duly issued U.S. Patent No. 9,299,044 (the "'044 patent") on March 29, 2016, after full and fair examination of Application No. 14/480,297, which was filed on November 4, 2002.

80. Fleet Connect owns all substantial rights, interest, and title in and to the '044 patent

including the sole and exclusive right to prosecute this action and enforce the '044 patent against infringers and to collect damages for all relevant times.

81. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the '044 patent.

82. The written description of the '044 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

A. THE TECHNICAL PROBLEMS OF MOBILE FIELD ASSET MANAGEMENT IN SEPTEMBER 2000.

83. The '044 patent, '565 patent, and the '949 patent (collectively, the “Mobile Field Asset Management Patents”)¹ are directed to a method, device, and apparatus for managing mobile assets in the field such as personnel, equipment and inventory via communications with handheld data management devices located in the field. '044 patent, 1:23-28; Goldberg Decl., ¶¶ 60-64.

84. The Mobile Field Asset Management Patents are generally targeted towards professional services, trades, and other industries that involve remote or distributed work “in the field.” Goldberg Decl., ¶66. According to the specification of the Mobile Field Asset Management Patents, the inventions claimed are “related to systems and methods in the management of mobile field assets via wireless handheld devices. '044 patent, 1:28-31; Goldberg Decl., ¶66.

¹ The Mobile Field Asset Management Patents all claim priority to provisional application No. 60/233,120, which was filed on September 18, 2000. '044 patent, at p. 1. Thus, specification disclosures common to all three patents are described herein and incorporated by reference in Counts V and VI. *See* Counts V and VI, *infra*.

Specifically, it describes a system and methods for managing mobile field assets such as personnel, equipment, and inventory using wireless handheld devices like smartphones, laptops, PDAs, and other portable computing devices. '044 patent, 1:22-28; Goldberg Decl., ¶66.

85. There were several limitations in the management of mobile field assets “that ha[d] been experienced with the growth of services [that] . . . can be attributed to the expansion of remote or distributed field activities, such as situation/location assessments, estimates, or appraisals.” '044 patent, 1:35-39; Goldberg Decl., ¶67. For instance, less experienced personnel may be undertaking the initial tasks of customer interaction, sales, data collection and/or the analysis and troubleshooting of problems in the field. *Id.* Personnel in field are usually required to collect data regarding a field situation that is generally be used later by more senior, experienced and/or responsible personnel to make decisions (business, technical, administrative and/or political). '044 patent, 1:39-45; Goldberg Decl., ¶67. The specification explains that “[e]ven the most experienced professionals m[ight have] f[ou]nd themselves lacking access to critical information or support that would be helpful in undertaking field operations.” '044 patent, 1:46-49; Goldberg Decl., ¶67. Further, “[e]fficiency in the remote dispatching of personnel given personnel vs. customer or field locations, as well as asset and inventory control can also be improved.” '044 patent, 1:49-51; Goldberg Decl., ¶67.

86. The specification of the Mobile Field Asset Management Patents identifies the “construction industry” as an example of a trade/industry with fleet vehicles and remote work needs where these issues had arisen by September of 2000. Goldberg Decl., ¶68. According to the Mobile Field Asset Management Patents, “individuals in the construction industry are often responsible for carrying out field assessments and providing estimates,” and there were “consequences of under bidding a project in the construction field,” including that such

underbidding “can be very costly and/or can affect performance and quality of services/activities related to the underbid project.” ’044 patent, 1:52-57; Goldberg Decl., ¶68.

87. The patent notes that “[c]onstruction project estimates require an accurate assessment and analysis of a job-site/projects in order to develop the data/facts necessary for an estimate to be rendered regarding use of labor, materials and completion time for a project.” ’044 patent, 1:63-67; Goldberg Decl., ¶69. Field operators were unlikely to have reasonable means to access supplemental information or update the current information about the field operations, which impacted the accuracy of field operations. ’044 patent, 2:1-9; Goldberg Decl., ¶69. For that reason, “[i]n cases where a project cost estimate, or bid, must be provided for a construction project, a business owner or senior journeymen can oftentimes be compelled to personally go to the field and collect information regarding a project in order to render a realistic and profitable bid because an inexperienced estimator might render an inaccurate appraisal.” ’044 patent, 1:57-63; Goldberg Decl., ¶69.

88. The Mobile Field Asset Management Patents teach various components and functionalities of smartphones, laptops, PDAs, and other portable computing devices, including GPS navigation, wireless communication modules and protocols for wirelessly transmitting data (like TCP/IP, CDPD, PPP, PSTN, GSM, PCS, CDMA, TDMA, GPRS, and Bluetooth), and discusses various user interfaces that could be used to interact with field data management programs. ’044 patent, 2:10-3:24; Goldberg Decl., ¶70.

89. The Mobile Field Asset Management Patents explain that, as of September 2000, “few applications were available that directly relate to interactive or industry-specific programs providing management of associated data and providing users with access to daily business practices and procedures related to a particular industry.” ’044 patent, 3:27-32; Goldberg Decl.,

¶71. Further, the Mobile Field Asset Management Patents explains that, at that time, “what was, and continue[s] to be needed in business, government, and industry where field operators are utilized is a system and method for managing assets in the field via wireless handheld devices. *Id.* Systems were, and remain, needed by businesses that could enable their field operators (e.g., users, operators, estimators, investigators, salesmen, and the like) to more efficiently and accurately operate in the field.” ’044 patent, 3:33-41; Goldberg Decl., ¶71.

B. THE CLAIMS OF THE ’044 PATENT PROVIDE SOLUTIONS TO PROBLEMS WITH PROBLEMS IN MOBILE FIELD ASSET MANAGEMENT IN SEPTEMBER OF 2000.

90. The claims of the ’044 patent are directed to devices and methods for coordinating field operations through worker specific templates on handheld devices that are synchronized to a remote server. Goldberg Decl., ¶79.

91. The ’044 patent contains 7 total claims (2 independent and 5 dependents, each of which include additional technical steps/limitations). Goldberg Decl., ¶80. Claims 5 and its dependents (claims 6 and 7) are illustrated below to highlight the claim limitations that are directed to solving some of the then-existing technical problems in mobile field asset management in September of 2000:

5. A device, comprising:

a memory device configured to store instructions; and

a processing device configured to execute the instructions stored in the memory device to:

access, at a beginning of a work shift using a handheld device, at least one template stored on a server located remotely from the handheld device, the at least one template listing tasks that are assigned to be completed before an end of the work shift;

report a status of each of the tasks at least once during the work shift by synchronizing the handheld device to the server; and

update the at least one template stored on the server in response to

the status with unfinished or new tasks.

6. The device of claim 5,

wherein the at least one template corresponds to a worker; and

wherein the worker is to complete the tasks before the end of the work shift.

7. The device of claim 6,

wherein the processing device is configured to execute the instructions stored in the memory device further to enable generating at least another template corresponding to at least another worker in response to the update; and

wherein the at least another template lists tasks assigned to the at least another worker to be completed by the at least another worker before an end of a work shift corresponding to the at least another worker.

'044 claims (emphasis added); Goldberg Decl., at ¶80.

92. A POSITA would not reasonably understand these claims to be directed to an abstract idea, much less the idea of “receiving and sending data.” Goldberg Decl., at ¶81. That characterization does not represent the actual teachings and claims of the '044 patent, which are concrete (and not abstract). *Id.* A POSITA would understand that the technical solutions discussed in the '044 patent (*see* Goldberg Decl., at ¶¶72-78) are directly captured in claims 5 (and its dependent claims) and claim 1 (and its dependent claims). Goldberg Decl., at ¶81.

93. These claims are directed to solutions that were identified as problems in the art of mobile field asset management as described in the specification of the '044 patent. Goldberg Decl., at ¶82.

94. For instance, claim 1, is a method for conducting field operations using a server and handheld devices, executing a program module to conduct the operation, providing field-specific info required by the module, transmitting that data to a remote resource (server or live expert),

retrieving enhanced data (analyzed results) back to the device. Goldberg Decl., at ¶83.

95. Claim 1 and its dependents demonstrate practical applications in improving computer performance by optimizing the logic of data transit. Goldberg Decl., at ¶84. The claims treat the “computer” as a distributed system and improve its throughput. *Id.* By defining a method that “accesses” a remote template at the start of a shift, it enables the handheld to not be required to run heavy scheduling or database-querying algorithms locally. *Id.* This offloads the “heavy lifting” (storage and logic processing) to the server. *Id.* The handheld’s processor and memory are spared from running complex resource-allocation algorithms, allowing the device to remain responsive and extend battery life despite having limited hardware. *Id.* Because the method updates the server “in response to the status,” it reduces the “dead time” in a system’s workflow, improving the performance of the overall business logic. *Id.*

96. Claim 5 and its dependent claims describe a device with a memory and processing unit configured to perform these tasks. Goldberg Decl., at ¶85. These claims are directed to the physical and logical structure of a handheld data management device. *Id.* The claims demonstrate practical applications that improve computer performance. *Id.* For example, contemporary field devices were often disconnected tools that lacked the specific hardware components to bridge the gap between local data collection and remote server intelligence. *Id.* Claim 5 encompasses a device with the ability to retrieve *new* data from a server that is specifically *associated* with the data just collected in the field. *Id.* As another example, by configuring the processor to synchronize “at least once,” the hardware is instructed to cycle its communication radio (a major power draw) only when necessary. *Id.* This improves the performance of the device in terms of operational uptime. *Id.*

97. The dependent claims recite additional concrete technical limitations. Goldberg Decl.,

at ¶86. Claim 6 narrows the “template” from a general list of tasks to a worker-specific data “object”. *Id.* By tailoring the template to a specific individual, *i.e.*, “corresponds to a worker,” claim 6 implements a relational database constraint and moves from a general “broadcast” system reflected in claim 5 to a directed-dispatch system. *Id.* This is technically significant for database management, as it requires the server to handle unique relational keys for each worker’s shift and performance metrics. *Id.* It also enables individualized asset tracking, allowing for the system to differentiate between the progress of different field units within the same work shift. *Id.*

98. Claims 7 introduce the concept of an “intelligent coordinator,” where an update from one device acts as a trigger for the server to generate or modify data for a separate device. Goldberg Decl., at ¶87. For example, if Worker A reports a status (e.g., “Incomplete” or “New Task Found”), the server doesn’t just store that data; it executes a logic gate that generates or modifies a template for Worker B. *Id.* These claims provide the details for a multi-user environment and solve the technical problem of “information silos.” *Id.*

99. Claim 4 narrows the physical layer of the communication by specifying wireless synchronization. Goldberg Decl., at ¶88. This eliminates “docking” or “wired” implementations (like old-fashioned PDA cradles). *Id.* By requiring a wireless link, the claim enforces the requirement for a radio-frequency (RF) communication stack (GSM, CDMA, WiFi) to be active during the work shift, supporting the “real-time” nature of the management solution. *Id.*

100. Claims 2 and 3 mirror claims 6 and 7 but translate them from instruction-level requirements for the device’s processing unit into method steps. Goldberg Decl., at ¶89.

101. Given the differences among the claims of the ’044 patent (discussed above), it is incorrect to treat claim 1 or claim 5 as representative of all other claims. Goldberg Decl., at ¶90. A POSITA would understand that these are not meaningless or trivial differences. *Id.* These

features present technical improvements optimizing system-level resource utilization, reducing data redundancy, and improving network efficiency. *Id.* In the context of 2000s-era mobile computing (the priority date of the patent), hardware was severely constrained. The claims provide specific technical maneuvers to overcome these bottlenecks. *Id.*

102. Thus, claim 5-7 (individually and collectively) and claims 1-4 (individually and collectively) claim devices and methods for coordinating field operations through worker specific templates on handheld devices that are synchronized to a remote server, which provide for specific means to manage mobile field assets in a way that could avoid the need to deploy more experienced personnel while ensuring that the quality of the field work was sufficient to provide quality assessments/estimates/appraisals. Goldberg Decl., at ¶91. A POSITA would understand that these claims provided a specific improvement in mobile field asset management by disclosing devices and methods for coordinating field operations through worker specific templates on handheld devices that are synchronized to a remote server. *Id.* This solution did not exist prior to the priority date of the '044 patent. *Id.*

103. These claims are not directed at subject matter that could be performed by a human, mentally or with pen and paper. Goldberg Decl., at ¶92. The claims in the patent, including claims 1, 5, and the other depending claims referenced above, accomplish something tangible in the computer world. *Id.* As explained above, the claims of the '044 patent are directed at improving the then-existing state of mobile field asset management by providing devices and methods for coordinating field operations through worker specific templates on handheld devices that synchronize with a server and reports the status of work (and suggests follow up tasks). *Id.* None of these steps could be performed by a human or with a pen and paper because, as recited in the specific claims of the '044 patent, the problems that the solutions of the '044 patent solve are

specifically due to the human factor, *i.e.*, the inability to have certain personnel on site at the field and allowing an inexperienced personnel to get sufficient and correct data for a more experienced human. *Id.*

104. The claims of the '044 patent also do not preempt all the ways of managing mobile field assets. Goldberg Decl., at ¶93. For instance, field asset management could be done without relying on templates and without requiring work tasks associated with specific personnel. *Id.* Other approaches exist that relate to managing mobile field assets and can be employed without infringing. *Id.* These include the nearly fifty (50) prior art patents and publications identified on the face of the patent. *Id.*

105. Even if the '044 patent claims were directed at an abstract idea, which a POSITA would not reasonably believe, the claims capture subject matter that was previously unknown and inventive. Goldberg Decl., at ¶94. A POSITA would understand that the claims of the '044 patent are directed to matter that was not known in the art at the time, and to the extent that the claims employ components and technology that existed at the time (like “memory devices,” “processing devices,” “templates,” “handheld devices,” and a “server,” for instance), they are employed together here in a way that was new and in a way that would not have been considered conventional, routine, or generic to a POSITA. *Id.*

106. The claims of the '044 patent are directed to subject matter and specific inventions that were not previously disclosed in the art. Goldberg Decl., at ¶95. The '044 patent teaches specific techniques to manage mobile field assets in a way that could avoid the need to deploy more experienced personnel while ensuring that the quality of the field work. *Id.* This provides quality assessments/estimates/appraisals for conducting work in the field through worker specific templates on handheld devices that are synchronized to a remote server is inventive and was not

previously known in the art. *Id.*

107. The elements of each claim as a whole, in the ordered combination of their limitations, including (A) independent claim 1, coupled with dependent claims 2-4, which build on each other and (B) independent claim 5, coupled with its dependent claims 6-7, as recited and described in detail above, were not known in the art. Goldberg Decl., at ¶96. A POSITA would understand that these claims did not merely employ known generic components in a conventional or routine way, which is supported by the description of the systems and methods claimed and how they are directed to solve the problems in search technologies that existed in September of 2000. *Id.* A POSITA would not have been aware of this particular combination of claim elements, including in independent claims 1 and 5, in light of their dependent claims, being used in the way described above (to solve then-existing problems in mobile field asset management) before the priority date of this patent. *Id.*

108. For the above reasons, the subject claims in the '044 patent teach significantly more than an abstract idea, including the idea of “receiving and sending data.” Goldberg Decl., at ¶97.

INFRINGEMENT OF THE '044 PATENT

109. Defendants have directly infringed one or more claims of the '044 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

110. Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '044 patent, as detailed in **Exhibit D** (Evidence of Use Regarding Infringement of U.S. Patent No. 9,299,044).

111. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for

such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT V: INFRINGEMENT OF U.S. PATENT NO. 9,747,565

112. Fleet Connect repeats and re-alleges the allegations in Paragraphs above as though fully set forth in their entirety.

113. The USPTO duly issued U.S. Patent No. 9,747,565 (the “’565 patent”) on August 29, 2017, after full and fair examination of Application No. 15/071,003, which was filed on March 15, 2016.

114. Fleet Connect owns all substantial rights, interest, and title in and to, the ’565 patent including the sole and exclusive right to prosecute this action and enforce the ’565 patent against infringers and to collect damages for all relevant times.

115. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the ’565 patent.

116. The written description of the ’565 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

The Claims Of The ’565 Patent Provide Technical Solutions To The Problems In Mobile Field Asset Management In September of 2000.

117. The claims of the ’565 patent are directed to devices and methods that focus on identifying unfinished tasks, reporting the status of tasks, synchronizing that data with the server at the end of the completion of the field event or project, and allocating unfinished tasks to another

worker/shift. Goldberg Decl., at ¶79.

118. The '565 patent contains 15 total claims (three independent and twelve dependent). Claim 6 and its dependent claims (claims 7 to 10) are illustrated below to highlight the claim limitations that are directed to solving some of the then-existing technical problems in mobile field asset management in September of 2000:

6. A device, comprising:

a memory device configured to store instructions; and

a processing device configured to execute the instructions stored in the memory device to:

access a template stored on a server located remotely from the device, the template listing tasks to be completed before an end of a work shift;

report a status of each of the tasks at least once by synchronizing the device to the server; and

update the template responsive to the status with unfinished or new tasks at the end of the work shift.

'565 patent at claim 6 (emphasis added); Goldberg Decl., at ¶98. The dependent claims to claim 6 provide:

7. The device of claim 6,

wherein the at least one template lists the tasks to be completed by a worker during the work shift.

8. The device of claim 6,

wherein the processing device is configured to execute the instructions stored in the memory device further to enable generating at least another template corresponding to at least another worker in response to the update; and

wherein the at least another template lists at least another task assigned to the at least another worker to be completed by the at least another worker before an end of another work shift corresponding to the at least another worker.

9. The device of claim 6,

wherein the processing device is configured to execute the instructions stored in the memory device *further to wirelessly synchronize the device to the server.*

10. The device of claim 6,

wherein the processing device is configured to execute the instructions stored in the memory device *further to report the status of each of the tasks at least once during the work shift by synchronizing the device to the server.*

'565 patent at claims 2-8 (emphasis added); Goldberg Decl., at ¶98.

119. A POSITA would understand that these claims are directed to much more than “receiving and sending data” or any other abstract idea. Goldberg Decl., at ¶99. The foregoing claim elements are both concrete and specific in what they claim. *Id.* A POSITA would understand that the technical solutions discussed in the '565 patent (*see* Goldberg Decl., at ¶¶72-78) are directly captured in claim 1 and its dependent claims (claims 2 to 5) and claim 6 and its dependent claims (claims 7 to 10) and claim 11 and its dependent claims (claims 12 to 15). *Id.*

120. These claims are directed to solutions that were identified as problems in the art of mobile field asset management as described in the specification of the '565 patent. Goldberg Decl., at ¶100.

121. For instance, claim 1, is a method for managing professional workflows using a server and handheld devices, focusing on automated synchronization, granular task tracking, trigger-based template generation, wireless connectivity, and frequent status reporting during a work shift. Goldberg Decl., at ¶101. These features are presented as technical improvements enhancing data integrity and efficiency in professional workflows. *Id.* Claim 1 and its dependents demonstrate practical applications improving computer performance through integrated automated steps for data integrity. *Id.* These claims enable parallel processing via dynamic triggers, optimize network

resource usage, and ensure precise task management. *Id.*

122. Claim 6 and its dependent claims describe a processing device with memory designed to automate professional workflows and maintain data integrity. Goldberg Decl., at ¶102. These claims introduce specific technical improvements such as an architectural design that enforces synchronization protocols to prevent data decay, a dynamic trigger mechanism for automated parallel data processing, and optimized wireless synchronization at least once per work shift for high data accuracy and low latency. *Id.* Claim 6 and its dependents demonstrate practical applications that improve computer performance by implementing a specialized architecture for high-integrity data management, and unlike generic “tool-based” computing, these claims integrate specific technical features to resolve system-level inefficiencies and provide a technological solution to a technological problem by improving how the system handles massive, time-sensitive data. *Id.* More specifically, the dependent claims (claims 7-10) recite additional concrete technical limitations. Claim 7 provides a technological solution by defining a worker-specific task allocation structure that synchronizes workflow data with each worker-specific task. *Id.* Claim 8 defines a processing device that executes instructions to automatically generate subsequent templates for different workers. *Id.* This provides a technical solution for parallel data processing by using state-based triggers to manage complex, multi-user workflows without manual intervention. *Id.* In claims 9 and 10, the device is configured for wireless synchronization and status reporting at least once per shift. *Id.* This specific timing and method optimize network resource usage and reduce latency, moving beyond simple data storage to an active management of communication overhead. *Id.*

123. Claim 11 recites a non-transitory computer-readable medium having stored instructions. Goldberg Decl., at ¶103. Claim 11 and its dependents (claims 12-15) introduce

additional specific technical improvements. *Id.* For example, claim 13 enables the processor to autonomously generate new templates based on the *results* of the update. *Id.* This allows for a system that manages multi-user workflows without external manual input, improving the computer's ability to handle complex, asynchronous datasets. *Id.* Claims 14 and 15 incorporate wireless protocols and reporting frequencies. *Id.* These are also additional technical improvements in resource management, as it mandates a specific synchronization cadence that prevents the local machine's data from becoming stale or obsolete. *Id.*

124. A POSITA would understand that these are not meaningless or trivial differences. Goldberg Decl., at ¶104. They are distinct technical operations, hardware requirements, and system level architectures that implement additional aspects of the invention disclosed in the '565 patent. *Id.*

125. Given the differences among the claims of the '565 patent (discussed above), it is incorrect to treat claim 1 and claim 6 as representative of all other claims. Goldberg Decl., at ¶105. A POSITA would understand that these claims are not representative of the full scope of the claims in the '565 patent. *Id.*

126. Thus, claim 1-5 (individually and collectively), claim 6-10 (individually and collectively) and claims 11-15 (individually and collectively) claim devices and methods for managing field assets through handheld devices by identifying unfinished tasks, reporting the status of tasks, synchronizing that data with the server at the end of the completion of the field event or project. Goldberg Decl., at ¶106. They also enable allocating unfinished tasks to another worker/shift, which was a means to deploy less experienced personnel while ensuring that the quality of the field work was sufficient to provide quality assessments/estimates/appraisals. *Id.* A POSITA would understand that the subject matter to which these claims are directed, in the form

they are claimed, and addressing then existing problems in mobile field asset management, was not previously known in the art. *Id.*

127. These claims are not directed at subject matter that could be performed by a human, mentally or with pen and paper. Goldberg Decl., at ¶107. The claims in the patent, including claims 1 (and its dependents), claim 6 (and its dependents), and claim 11 (and its dependents) achieve tangible results in the then-existing computer systems that existed for managing field assets. *Id.* As explained above, the claims of the '565 patent are directed at improving the then-existing state of mobile field asset management by providing devices and methods for managing field work through the use of templates deployed on handheld devices that control task allocation, report on the status of tasks, and ensure reallocation of unfinished tasks. *Id.* None of these steps could be performed by a human or with a pen and paper because, as recited in the specific claims of the '565 patent, the problems that the solutions of '565 patent solve are specifically due to the to the human factor, *i.e.*, the problems caused by having less experienced personnel on site at the field, which has become more of a problem in industries with the expansion of remote/distributed field activities, such as location assessments, estimates, or appraisals. *Id.*

128. Also, the claims of the '565 patent do not preempt all the ways of managing mobile field assets. Goldberg Decl., at ¶108. For instance, field asset management could be done without relying on templates and without requiring unfinished tasks being reallocated among workers. *Id.* Additionally, any number of other ways managing mobile field assets could be employed without infringing, including by using the nearly fifty (50) prior art patents and publications identified on the face of the patent. *Id.*

129. Even if the '565 patent claims were directed at an abstract idea (which they are not), the claims capture subject matter that is inventive. Goldberg Decl., at ¶109. A POSITA would

understand that the claims of the '565 patent are directed to matter that was not known in the art at the time, and to the extent that the claims employ components and technology that existed at the time (like a “template,” “memory device” and “processing device,” “server,” or a “handheld device,” for instance), they are employed together here in a way that was new (and certainly would not have been considered conventional, routine, or generic to those skilled in the art). *Id.* A POSITA would understand that the use of the components in claims 1 (and its dependents), claim 6 (and its dependents), and claim 11 (and its dependents), as claimed in the various forms in these claims to address the problems existing in September of 2000 in mobile field asset management, is inventive and was not previously known in the art. *Id.*

130. Even if that were not true, the specific ordered combination of limitations in claim 1-5 (individually and collectively), claim 6-10 (individually and collectively) and claims 11-15 (individually and collectively) of the '565 patent, as recited and described in detail above, were not well-known in the art. Goldberg Decl., at ¶110. A POSITA would not have been aware of any art or system that existed at the time and that disclosed all of these limitations in a way that solved the then-existing problems mobile field asset management. *Id.* A POSITA would have understood that these claims do not merely employ known generic components in a conventional or routine way. *Id.* These claims are directed to specific solutions using technology in an inventive and unique way, as explained above, to solve the well-documented problems that were then-known in the art. *Id.*

131. For the above reasons, the claims of the '565 patent claim a combination of elements sufficient to ensure that the claims themselves, both in substance and in practice, are directed to concrete and inventive concepts (not an abstract idea, such as receiving and sending data). Goldberg Decl., at ¶111.

INFRINGEMENT OF THE '565 PATENT

132. Defendants have directly infringed one or more claims of the '565 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

133. Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '565 patent, as detailed in **Exhibit E** (Evidence of Use Regarding Infringement of U.S. Patent No. 9,747,565).

134. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT VI: INFRINGEMENT OF U.S. PATENT NO. 10,671,949

135. Fleet Connect repeats and re-alleges the allegations in Paragraphs above as though fully set forth in their entirety.

136. The USPTO duly issued U.S. Patent No. 10,671,949 (the "'949 patent") on June 2, 2020, after full and fair examination of Application No. 15/660,685, which was filed on July 26, 2017.

137. Fleet Connect owns all substantial rights, interest, and title in and to the '949 patent including the sole and exclusive right to prosecute this action and enforce the '949 patent against infringers and to collect damages for all relevant times.

138. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the '949 patent.

139. The written description of the '949 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

The Claims Of The '949 patent Provide Technical Solutions To Problems In Mobile Field Asset Management In September of 2000.

140. The relevant '949 patent claims are directed to systems and methods for managing field assets through worker specific templates that prioritize and track task groups on devices that are synchronized to a remote server. Goldberg Decl., at ¶79.

141. The '949 patent contains 19 total claims (3 independent and 16 dependents, each of which include additional technical steps/limitations). Claim 1 and its dependents (claims 2-6) are illustrated below to highlight the claim limitations that are directed to solving some of the then-existing technical problems in mobile field asset management in September of 2000:

1. A method, comprising:

accessing a template stored on a server located remotely from a handheld device, the template listing a first set of tasks to be completed in a first predetermined time period;

reporting, after a time of the accessing, a status of each of the tasks of the first set of tasks by synchronizing the handheld device to the server;
and

updating the template responsive to the status, the updated template including a second set of tasks to be completed in a second predetermined time period.

'949 patent, claim 1 (emphasis added); Goldberg Decl., at ¶112. The dependent claims to claim 1 provide:

2. The method of claim 1, wherein the *updated template lists those tasks of the first set of tasks that are completed during the first predetermined time period.*

3. The method of claim 1, wherein *at least one task of the first set of tasks is associated with a first person, and at least one task of the second set of tasks is associated with a second person who is different than the first person.*

4. The method of claim 1, further comprising: *wirelessly synchronizing the handheld device to the server.*

5. The method of claim 1, wherein *the time of the accessing corresponds to a beginning of the first predetermined time period, and a time of the reporting corresponds to an end of the first predetermined time period.*

6. The method of claim 1, wherein *the first and second predetermined time periods are assigned to different persons.*

'949 patent, claims 2-6 (emphasis added); Goldberg Decl., at ¶112.

142. A POSITA would understand that these claims are directed to more than “receiving and sending data” or any other abstract idea. Goldberg Decl., at ¶113. That characterization is inconsistent with the actual teachings and claims of the '949 patent, which are clear and concrete (and not abstract). *Id.* A POSITA would understand that the technical solutions discussed in the '949 patent are directly captured in claim 1 (and its dependent claims), claim 7 (and its dependent claims), and claim 13 (and its dependent claims). *Id.*

143. These claims are directed to solutions that were identified as problems in the art of mobile field asset management as described in the specification of the '949 patent. Goldberg Decl., at ¶114.

144. For instance, claim 1, is a method of conducting field operations that integrates industry-specific modules with remote expert analysis. Goldberg Decl., at ¶115. These features

are presented as technical improvements by defining a technical synchronization protocol that improves the coordination of distributed assets. *Id.* Claim 1 and its dependents implement this synchronization protocol, where: (i) a local module enforces structured data collection (ensuring data integrity); (ii) data is transmitted to a remote resource (server or live expert); and (iii) enhanced data is returned to the device. *Id.* By requiring the server to “update the template responsive to the status,” the method automates the transition from one work state to the next, reducing system latency. *Id.* More specifically, the dependent claims (claims 2-6) recite additional concrete technical limitations. *Id.* Claim 2 improves data integrity. *Id.* By specifically listing completed tasks in the updated template, the system maintains an audit trail within the active data structure. *Id.* Claim 3 addresses the information silo problem, automatically routing the results of one worker’s shift into the tasking for the next worker, effectively managing a distributed workforce. *Id.* Claim 4 requires the integration of a mobile transceiver with the task-management logic, ensuring the system can maintain state across geographically displaced nodes. *Id.* Claim 5 implements session integrity by tying access to the “beginning” and reporting to the “end” of a time period. *Id.* By defining hard boundaries for when data is pulled and pushed, the system prevents multiple users from attempting to modify the same record simultaneously, which would otherwise lead to data corruption. *Id.* Claim 6 represents an improvement in resource scheduling logic. *Id.* The server manages the “time dimension” of the database, allowing for a continuous, multi-person operational loop without overlapping or conflicting instructions. *Id.*

145. Claim 7 and its dependent claims describes a physical apparatus—comprising a processing device and a memory device—integrated into a specific distributed system architecture. Goldberg Decl., at ¶116. The processing device is specifically configured to manage data cycles (Access – Report – Update) locally before causing an update on a remote server. *Id.* Unlike a

generic web browser that might lose data if a connection drops, the device is configured to manage the state of the template locally and synchronize it. *Id.* This ensures that the hardware remains a reliable “data probe” even in the electronically noisy and unstable environments of a construction site or industrial field. *Id.* More specifically, the dependent claims (claims 8-12) recite additional concrete technical limitations. *Id.* Claim 8 encompasses a processor that is configured to perform a logical reconciliation of unfinished tasks. *Id.* It identifies null or incomplete “status” flags and carries those objects into the next data set. *Id.* Claim 9 improves system accountability and security. *Id.* By partitioning data at the processor level, the device ensures that Person B cannot access or overwrite the instructions meant for Person A, solving the technical problem of data collision in a shared-template environment. *Id.* Claim 10 provides a device that can update the “master” server template while the asset is still in the field, eliminating the latency of end-of-day docking, through wireless synchronization. *Id.* Claim 11 implements session integrity by tying access to the “beginning” and reporting to the “end” of a time period. *Id.* By defining hard boundaries for when data is pulled and pushed, the system prevents multiple users from attempting to modify the same record simultaneously, which would otherwise lead to data corruption. *Id.* Claim 12 represents an improvement in resource scheduling logic. *Id.* The server manages the “time dimension” of the database, allowing for a continuous, multi-person operational loop without overlapping or conflicting instructions. *Id.*

146. Claim 13 recites a non-transitory computer-readable medium having stored instructions. Goldberg Decl., at ¶117. Claim 11 and its dependents (claims 12-15) introduce additional specific technical improvements. *Id.* For example, claim 13 enables the processor to access a remote template, capture a “status,” and trigger a server-side update to generate a second set of tasks. *Id.* By being housed on a “non-transitory computer-readable medium,” claim 13 is

tied to physical storage (flash, ROM, or magnetic media) that interfaces with a processing device to alter the state of a remote database. *Id.*

147. A POSITA would understand that these are not meaningless or trivial differences. Goldberg Decl., at ¶118. They are distinct technical operations, hardware requirements, and system level architectures that implement additional aspects of the invention disclosed in the '949 patent. *Id.*

148. Given the differences among the claims of the '949 patent (discussed above), it is incorrect to treat claim 1 as representative of all other claims. Goldberg Decl., at ¶119. A POSITA would understand that these claims are not representative of the full scope of the claims in the '949 patent. *Id.*

149. Claims 1-6 (individually and collectively), claims 7-12 (individually and collectively), and claims 13-19 (individually and collectively) claim devices and methods for managing field assets through worker specific templates that prioritize and track task groups on devices that are synchronized to a remote server, which provide for specific means to manage mobile field assets in a way that could avoid the need to deploy more experienced personnel while ensuring that the quality of the field work was sufficient to provide quality assessments/estimates/appraisals. Goldberg Decl., at ¶120. A POSITA would understand that these claims provided a specific improvement in mobile field asset management by disclosing devices and methods for managing field assets through worker specific templates that prioritize and track task groups on devices that are synchronized to a remote server, and that this type of solution did not exist prior to the priority date of the '949 patent. *Id.*

150. These claims are not directed at subject matter that could be performed by a human, mentally or with pen and paper. Goldberg Decl., at ¶121. The claims in the patent, including

claims 1, 7, 13, and the other dependent claims referenced above, accomplish something tangible in the computer world. *Id.* As explained above, the claims of the '949 patent are directed at improving the then-existing state of mobile field asset management by providing devices and methods for managing field assets by grouping and tracking the completion of tasks through server synchronized, worker specific templates on handheld devices. *Id.* None of these steps could be performed by a human or with a pen and paper because, as recited in the specific claims of the '949 patent, the problems that the solutions of the '949 patent solve are specifically due to the human factor, *i.e.*, the inability to have certain personnel on site at the field and allowing inexperienced personnel to get sufficient and correct data for a more experienced human. *Id.*

151. The claims of the '949 patent do not preempt all the ways of managing mobile field assets. Goldberg Decl., at ¶122. For instance, field asset management could be done without relying on templates, without grouping and tracking tasks in the way the '949 patent claims do, and without providing location information associated with specific jobsites. *Id.* Other methods of managing mobile field assets could be employed without infringing, including by using the more than one hundred (100) prior art patents and publications identified on the face of the patent. *Id.*

152. Even if the '949 patent claims were directed at an abstract idea, which a POSITA would not reasonably believe, the claims capture subject matter that was previously unknown and inventive. Goldberg Decl., at ¶123. A POSITA would understand that the claims of the '949 patent are directed to matter that was not known in the art at the time, and to the extent that the claims employ components and technology that existed at the time (like “templates,” “handheld devices,” “task,” and a “server,” for instance), they are employed together here in a way that was new and in a way that would not have been considered conventional, routine, or generic to a

POSITA. *Id.* The '949 patent's provision of specific means to manage mobile field assets in a way that could avoid the need to deploy more experienced personnel while ensuring that the quality of the field work was sufficient to provide quality assessments/estimates/appraisals through the use of devices and methods that include worker specific templates that prioritize and track task groups on handheld devices that are synchronized to a remote server is inventive and was not previously known in the art. *Id.*

153. The elements of each claim as a whole, in the ordered combination of their limitations, including (A) independent claim 1, coupled with dependent claims 2-6; (B) independent claim 7, coupled with its dependent claims 8-12; and (C) independent claim 13, coupled with dependent claims 14-19, which build on each other, as recited and described in detail above, were not known in the art. Goldberg Decl., at ¶124. A POSITA would understand that these claims did not merely employ known generic components in a conventional or routine way, which is supported by the description of the systems and methods claimed and how they are directed to solve the problems in search technologies that existed in September of 2000. *Id.* In fact, a POSITA would not have been aware of this particular combination of claim elements, including in independent claims 1, 7, and 13, especially in light of their dependent claims, being used to manage mobile field assets to avoid the need to deploy more experienced personnel while ensuring that the quality of the field work by employing devices and methods that include worker specific templates that prioritize and track task groups on handheld devices that are synchronized to a remote server before the priority date of this patent. *Id.*

154. For the above reasons, the subject claims in the '949 patent recite a combination of elements that represent considerably more than an abstract idea, including the idea of "receiving and sending data." Goldberg Decl., at ¶125.

INFRINGEMENT OF THE '949 PATENT

155. Defendants have directly infringed one or more claims of the '949 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

156. Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '949 patent, as detailed in **Exhibit F** (Evidence of Use Regarding Infringement of U.S. Patent No. 10,671,949).

157. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT VII: INFRINGEMENT OF U.S. PATENT NO. 6,549,583

158. Fleet Connect repeats and re-alleges the allegations in Paragraphs above as though fully set forth in their entirety.

159. The USPTO duly issued U.S. Patent No. 6,549,583 (the "'583 patent") on April 15, 2003, after full and fair examination of Application No. 09/790,429, which was filed February 21, 2001.

160. Fleet Connect owns all substantial rights, interest, and title in and to the '583 patent, including the sole and exclusive right to prosecute this action and enforce the '583 patent against infringers and to collect damages for all relevant times.

161. Fleet Connect or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the '583 patent.

162. The claims of the '583 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of preexisting error estimation methods.

163. The written description of the '583 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

164. Defendants have directly infringed one or more claims of the '583 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

165. Defendants have directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '583 patent, as detailed in **Exhibit G** (Evidence of Use Regarding Infringement of U.S. Patent No. 6,549,583).

166. Fleet Connect has been damaged as a result of the infringing conduct by Defendants alleged above. Thus, Defendants are liable to Fleet Connect in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

167. Fleet Connect hereby requests a trial by jury on all issues so triable by right.

PRAYER FOR RELIEF

168. Fleet Connect requests that the Court find in its favor and against Defendants, and that

the Court grant Fleet Connect the following relief:

- a. Judgment that one or more claims of each of the Asserted Patents has been infringed, either literally or under the doctrine of equivalents, by Defendants or others acting in concert therewith;
- b. Judgment that Defendants account for and pay to Fleet Connect all damages to and costs incurred by Fleet Connect because of Defendants' infringing activities and other conduct complained of herein;
- c. Pre-judgment and post-judgment interest on the damages caused by Defendants' infringing activities and other conduct complained of herein;
- d. That this Court declare this an exceptional case and award Fleet Connect its reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and
- e. All other and further relief as the Court may deem just and proper under the circumstances.

Dated: February 11, 2026

Respectfully submitted,

By: /s/ William R. Poynter

William R. Poynter (VSB No. 48672)

KALEO LEGAL

4456 Corporation Lane, Suite 135

Virginia Beach, Virginia 23462

Telephone: (757) 238-6383

Facsimile: (757) 304-6175

wpoynter@kaleolegal.com

Jonathan L. Hardt (TX 24039906)*

ROZIER HARDT McDONOUGH PLLC

712 W. 14th Street, Suite A

Austin, Texas 78701

Telephone: (210) 289-7541

Email: hardt@rhmttrial.com

C. Matthew Rozier (CO 46854)*

ROZIER HARDT McDONOUGH PLLC

1500 K Street, 2nd Floor

Washington, District of Columbia 20005

Telephone: (404) 779-5305, (202) 316-1591

Email: matt@rhmttrial.com

James F. McDonough, III (GA 117088)*

ROZIER HARDT McDONOUGH PLLC

659 Auburn Avenue NE, Unit 254

Atlanta, Georgia 30312

Telephone: (404) 564-1866

Email: jim@rhmttrial.com

Attorneys for Plaintiff FLEET CONNECT SOLUTIONS LLC

* *Pro hac vice* admission to be filed

CERTIFICATE OF SERVICE

I hereby certify that on this day I caused a true and correct copy of the foregoing document to be filed electronically with the Clerk of Court using the Court's CM/ECF system. As such, this document was served on all counsel who are deemed to have consented to electronic service.

Dated: February 11, 2026

By: /s/ William R. Poynter

William R. Poynter