IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAMSCLOUD, LLC, Plaintiff, v. RAVE WIRELESS, INC., d/b/a RAVE MOBILE SAFETY, Defendant.	))))))))))	C.A. No. _____ **JURY TRIAL DEMANDED**

PLAINTIFF'S COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Samscloud, LLC ("Samscloud" or "Plaintiff") files this Complaint against Defendant Rave Wireless, Inc., d/b/a Rave Mobile Safety ("Rave" or "Defendant") for infringement of U.S. Patent Nos. 11,468,757 (the "'757 patent") and 12,154,421 (the "'421 patent").

THE PARTIES

1. Plaintiff Samscloud is a Texas LLC founded in 2017 with an address at 11131 Carriage Lake, Houston, TX, 77065.

2. On information and belief, Defendant Rave is a corporation organized under the laws of the State of Delaware, with its principal place of business located at 492 Old Connecticut Path, 2nd Floor, Framingham, MA 01701. On information and belief, Rave was acquired by Motorola Solutions in 2022, but continues to operate under the Rave Mobile Safety name, including by selling the Infringing Products described herein under both Rave and Motorola branding. Rave may be served with process via its registered agents and via its corporate officers.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, namely 35 U.S.C. §§ 271, 281, and 284-285, among others.

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. On information and belief, Rave is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Delaware Long Arm Statute, due at least to its substantial business in this State and judicial district, including: (A) at least part of its infringing activities alleged herein which purposefully avail the Defendant of the privilege of conducting those activities in this state and this judicial district and, thus, submits itself to the jurisdiction of this Court; and (B) regularly doing or soliciting business, engaging in other persistent conduct targeting residents of the State of Delaware and this judicial district, and/or deriving substantial revenue from infringing goods offered for sale, sold, and imported and services provided to and targeting Delaware residents and residents of this judicial district vicariously through and/or in concert with its alter egos, intermediaries, agents, distributors, importers, customers, subsidiaries, and/or consumers. For example, Rave advertises "state wide deployments" of its products, including in Delaware. *Critical Communication & Collaboration Solutions*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/critical-communication-collaboration-solutions/ (last visited July 15, 2026). Additionally, in 2019, the Delaware House of Representatives passed a Concurrent Resolution encouraging the Delaware Department of Education to establish Rave security systems in all state public and charter schools. *See* H.C.R. 58, 150th Gen. Assemb. (Del. 2019).

6. Defendant also maintains commercial websites accessible to residents of the State of Delaware and this judicial District, through which Defendant promotes and facilitates sales of the infringing products. For example, Rave's website ravemobilesafety.com is accessible to consumers in the United States, including those in the State of Delaware and this judicial District. Rave not only supplies information about the Infringing Products at this site, but also educates consumers on pursuing state and local funds in order to facilitate purchasing the Infringing Products. *See Grant Assistance Program For Your Next Safety Technology Project*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/grant-assistance-program/ (last visited July 15, 2026).

7. Thus, Defendant has established minimum contacts with the State of Delaware and the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice.

8. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c) and 1400(b). Defendant is organized under the laws of the State of Delaware and has committed acts of infringement in this district. Accordingly, Rave may be sued in this district under 28 U.S.C. § 1400(b).

THE ASSERTED PATENTS AND TECHNOLOGY

9. Gary Baker is the sole inventor of the Asserted Patents: the '757 Patent and the '421 Patent, both titled "Systems and methods for facilitating supervision of individuals based on geofencing." The Asserted Patents both share a priority date at least as early as March 5, 2019. The '421 Patent is a continuation-in-part of the '757 Patent.

10. Mr. Baker is the CEO, founder, chairman, and sole owner of Samscloud. Samscloud sells products and services covered by the Asserted Patents, which Samscloud advertises via its website samscloud.io.

11. The Asserted Patents are directed toward systems and methods for creating a grid-based geofence and supervising individuals within the geofenced area. The systems and methods utilize a combination of various types of devices to generate the geofence as seen, for example, in the Abstract for the '757 Patent:

> Accordingly, the method may include receiving, using a communication device, a parameter from a supervisor device associated with a supervisor and a geographical location from the supervisor device. Further, the method may include analyzing, using a processing device, the geographical location based on a security parameter and generating a geofence corresponding to a geographical area based on the analyzing. Further, the method may include receiving, using the communication device, supervisee data associated with a supervisee from a supervisee device. Further, the method may include analyzing, using the processing device, the supervisee data based on the geofence and generating a supervision notification based on the analyzing of the supervisee data. Further, the method may include transmitting, using the communication device, the supervision notification to the supervisor device.

12. The Asserted Patents describe supervision systems and methods that involve creating a geofence comprising a grid in which each grid box is also geofenced, tracking the location of individuals within the geofence and the grid boxes, and implementing various supervision and alert features to protect supervisees within the geofenced area. The Asserted Patents describe a claimed combination of dedicated elements and processes that were not, at the time of invention, well-understood, routine, or conventional.

13. An exemplary embodiment is shown in Figure 42 of each of the Asserted Patents:

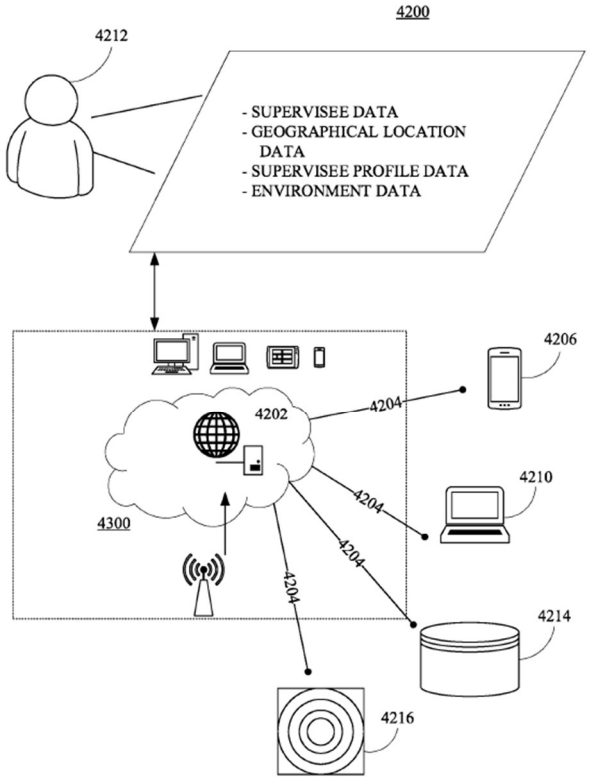


FIG. 42

14. Defendant makes, uses, sells, has sold, and/or offers for sale in the United States products ("Infringing Products") that are not made or licensed by Samscloud and that infringe the Asserted Patents.

15. Defendant markets its Infringing Products specifically extolling the functionality of the Asserted Patents. As one example, Rave advertises that its Mobile Safety Suite of products utilize detailed mapping, location tracking, and grid-based geofencing. *See Rave Facility*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/products/rave-facility/ (last visited July 15, 2026). Further, Rave integrates "Collaborative Response Graphics" provided by Critical Response Group ("CRG") into the Mobile Safety Suite of products; CRG's graphics provide building blueprints and grid-based maps to be used with geofencing to supervise individuals. *See Rave Mobile Safety*, CRG, https://www.crgplans.com/integrations/rave-mobile-safety/ (last visited July 15, 2026); *Collaborative Response Graphics* ®, CRG, https://www.crgplans.com/collaborative-

response-graphics/ (last visited July 15, 2026). Rave incorporates CRG's gridded reference system, which subdivides mapped facilities into identifiable grid regions used for emergency response, accountability, and location tracking to provide supervision via grid-based geofencing. *See id*.

16. On information and belief, the individual products of Rave's Mobile Safety Suite interact with each other and utilize the features of each product together in order to provide safety solutions to Rave's customers. *See Rave Facility*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/products/rave-facility/ (last visited July 20, 2026) ("Motorola Solutions Facility is a module of the Rave 911 Suite"); *see also Rave Panic Button*, MOTOROLA SOLUTIONS, https://www.motorolasolutions.com/en_us/products/command-center-software/panic-button.html (last visited July 20, 2026) (advertising Facility as an "additional feature" to Rave Panic Button); *Rave Mobile Safety Apps*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/products/rave-mobile-safety-apps/ (last visited July 20, 2026) (advertising the Mobile Safety Suite as a "comprehensive platform" including the features of each app).

17. On information and belief, all of Rave's Mobile Safety Suite of products that are made, sold, offered for sale, or used in the United States within the statutory period are Infringing Products, including but not limited to Rave 911 Suite, Rave Panic Button, and Motorola Solutions Facility. The product names listed in this complaint are exemplary and not exhaustive.

COUNT I

(Infringement of the '757 Patent)

18. Plaintiff incorporates and re-alleges the allegations contained in paragraphs 1 through 17 herein by reference.

19. The ’757 Patent entitled “Systems and methods for facilitating supervision of individuals based on geofencing” was duly and legally issued by the U.S. Patent and Trademark Office on October 11, 2022, from Application No. 16/810,703, published at US2020/0286355 on September 10, 2020, claiming priority to provisional application 62/814,097 filed on March 5, 2019. A true and accurate copy of the ’757 Patent is attached hereto as Exhibit A.

20. Each and every claim of the ’757 Patent is valid and enforceable, and each enjoys a statutory presumption of validity under 35 U.S.C. § 282.

21. Samscloud exclusively owns all rights, title, and interest in and to the ’757 Patent and possesses the exclusive right of recovery, including the exclusive right to recover for past, present, and future infringement.

22. Claim 1 of the ’757 Patent recites:

> A method for facilitating supervision of individuals based on geofencing, the method comprising:
> receiving, using a communication device, at least one security parameter from at least one supervisor device associated with at least one supervisor;
> receiving, using the communication device, a geographical location from the at least one supervisor device;
> analyzing, using a processing device, the geographical location based on the at least one security parameter;
> generating, using the processing device, a geofence corresponding to a geographical area based on the analyzing;
> receiving, using the communication device, at least one supervisee data associated with a supervisee from at least one supervisee device;
> analyzing, using the processing device, the at least one supervisee data based on the geofence;
> generating, using the processing device, a supervision notification based on the analyzing of the at least one supervisee data;
> transmitting, using the communication device, the supervision notification to the at least one supervisor device; and
> storing, using a storage device, the at least one supervisee data and the supervision notification, wherein:
> the geofence is characterized by a geofence area corresponding to the geographical area, wherein the geofence comprises a plurality of geofence grid boxes associated with the geofence area, wherein each geofence grid

box is characterized by a grid box geofence area of the geofence area, wherein the method comprises:

receiving, using the communication device, at least one grid parameter from the at least one supervisor device, wherein the processing device is further configured for:

analyzing, using the processing device, the at least one grid parameter;

determining, using the processing device, the grid box geofence area based on the analyzing of the at least one grid parameter; and

generating, using the processing device, a number of geofence grid boxes based on the determining.

23. Each Infringing Product is configured to perform a method for facilitating supervision of individuals. For example, Rave's Mobile Safety Suite provides multiple integrated features for supervising individuals and assisting in emergency response:

Rave Alert

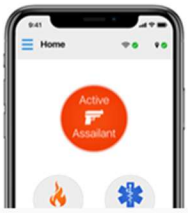
A FedRAMP-authorized mass notification system that enables reliable, multimodal messages in just three clicks.

Learn more

Rave AppArmor

Custom branded personal safety application with over fifty powerful features to strengthen incident response and protect your people.

Learn more



Rave Panic Button

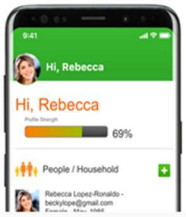
Rapidly communicate in an emergency with the push of a button, simultaneously connecting to on-site personnel and first responders.

Learn more

Rave Collaborate

Tactical emergency management software to digitize and automate standard operating procedures during planned and unplanned events.

Learn more



Rave 911 Suite

Enhance your 911 operations with caller profiles, enhanced location data, functional needs registry and more.

Learn more

Rave Link

Share data and more effectively collaborate across jurisdictions and on different CAD platforms.

Learn more

Source: *Rave Mobile Safety Suite*, MOTOROLA SOLUTIONS, https://www.motorolasolutions.com/en_us/products/command-center-software/rave.html (last visited July 15, 2026).

24. Further, on information and belief, the methods performed by the Infringing Products are based on geofencing. For example, the Motorola Solutions Facility module of the Rave 911 Suite utilizes geofencing to facilitate emergency services:

Motorola Solutions Facility Features

*Motorola Solutions Facility is not available in Canada

Detailed Mapping
Data elements include floor plans, key holder information, alarm information, location of phones, utility shut-offs, AED locations, and contact information for key administrators and security personnel.

Up-To-Date Information
Facility managers enter and maintain their own data and are prompted with regular reminders to keep the information up-to-date. Public Safety agencies are provided controls for reviewing, verifying, approving, and accessing the data.

Geo-Fenced Locations
Users geo-fence and define each building in the system, enabling the display of critical facility information for every call made from that location – whether landline or wireless.

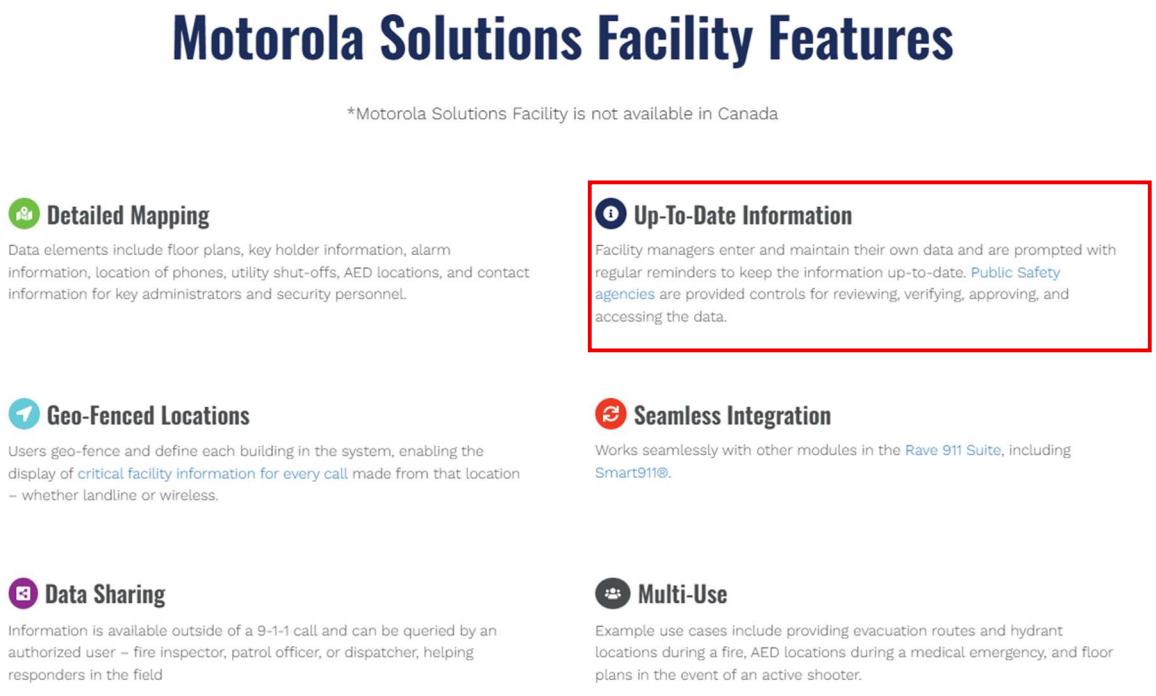
Seamless Integration
Works seamlessly with other modules in the Rave 911 Suite, including Smart911®.

Data Sharing
Information is available outside of a 9-1-1 call and can be queried by an authorized user – fire inspector, patrol officer, or dispatcher, helping responders in the field

Multi-Use
Example use cases include providing evacuation routes and hydrant locations during a fire, AED locations during a medical emergency, and floor plans in the event of an active shooter.

Source: *Rave Facility*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/products/rave-facility/ (last visited July 15, 2026).

25. On information and belief, each Infringing Product is configured to receive security parameters from supervisor devices. For example, facility managers (*i.e.*, supervisors) can upload and maintain data for emergency response, including parameters relating to safety hazards and other emergency response information:



Source: *Rave Facility*, RAVE MOBILE SAFETY.

What Are the Most Popular Features of the Rave 911 Suite?

The Rave 911 Suite provides emergency response professionals with crucial functionality:

- **Critical 9-1-1 Caller Info:** View the caller's name and address, medical conditions, photos, pets and household members through Smart911, or use notes to identify frequent callers.
- **Two-Way Communication:** Initiate two-way text messaging and live-streaming video from first responders and on-scene bystanders.
- **Enhanced Location Data:** Supplement existing automatic location identification (ALI) information with improved e911 location tracking, and access floor plans and other facility information.
- **Access & Functional Needs Registry:** Connect to a web-based, resident-sourced access and functional needs population registry as necessary for analysis, planning and emergency response.

Source: *How the Rave 911 Suite and Smart911 Protect Schools and Communities*, MOTOROLA SOLUTIONS, https://blog.motorolasolutions.com/en_us/rave-911-suite-smart911-schools/ (Jan. 18, 2022; archived Dec. 5, 2025).

26. On information and belief, each Infringing Product is also configured to receive geographical locations from supervisor devices. For example, supervisors accessing the Infringing Products can upload information, including geographical locations and floor plans, to Rave's cloud-based web app:

Source: *Rave Facility*, RAVE MOBILE SAFETY.

27. As another example, Rave has partnered with Critical Response Group ("CRG") to integrate CRG's "Collaborative Response Graphics" and utilize "GeoRelevant integrated floor plans" and geospatial data (*i.e.*, geographical locations) to provide detailed maps and location information for emergency response:

RAVE MOBILE SAFETY

Rave Mobile Safety integrates Collaborative Response Graphics® into Mass Notification and Panic Button Systems

Mass Notification Systems for Schools by Rave Mobile Safety

works with Critical Response Group® mapping solutions

Rave Mobile Safety integrates with Collaborative Response Graphics® from Critical Response Group to deliver mass notification and panic button systems, enhancing emergency response for schools and businesses.

Source: *Rave Mobile Safety*, CRG, https://www.crgplans.com/integrations/rave-mobile-safety/ (last visited July 15, 2026).

LAYER BREAKDOWN

Creating a Unified Map, Inside and Out

CRGs combine a gridded reference system, high-resolution imagery, floor plans, and critical features within a building and surrounding exterior areas to create a communication tool that is usable in a crisis and accessible by first responders through any smart device.

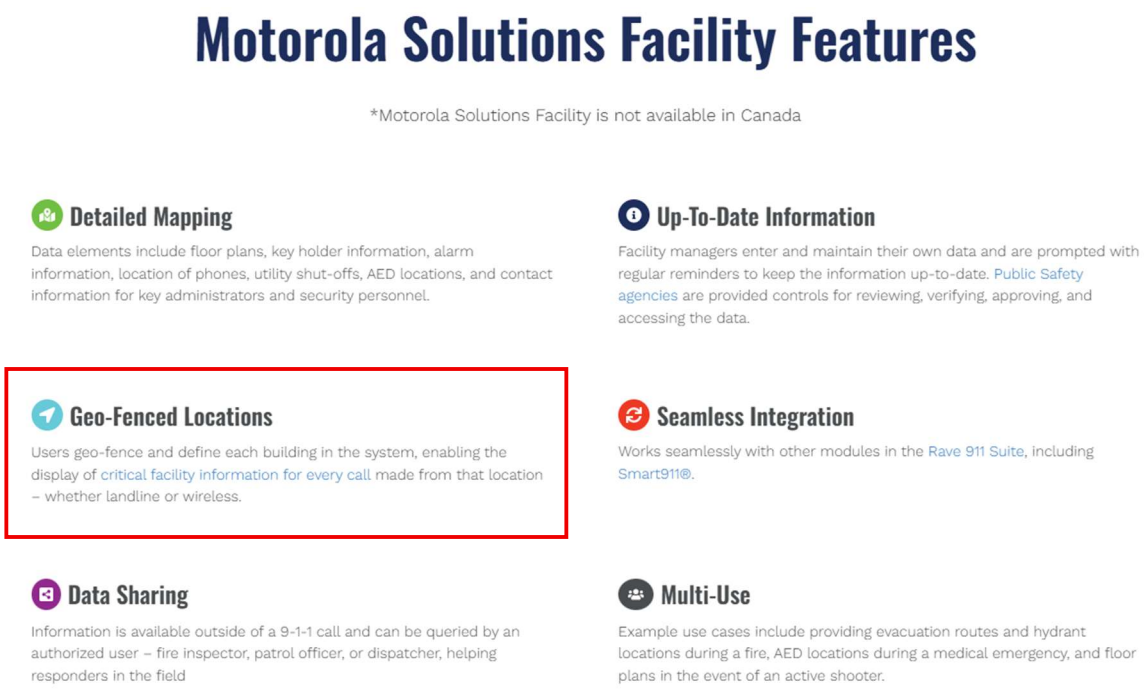
1. Grid & Template
2. Key Landmarks & Critical Features (AED, Gas, etc)
3. Site Specific Labels and Nomenclature
4. Highlighted Hallways, Stairwells, Doors, Exits
5. GeoRelevant Integrated Floorplans
6. Best Available Aerial Imagery

Source: *Collaborative Response Graphics* ®, CRG, https://www.crgplans.com/collaborative-response-graphics/ (last visited July 15, 2026).

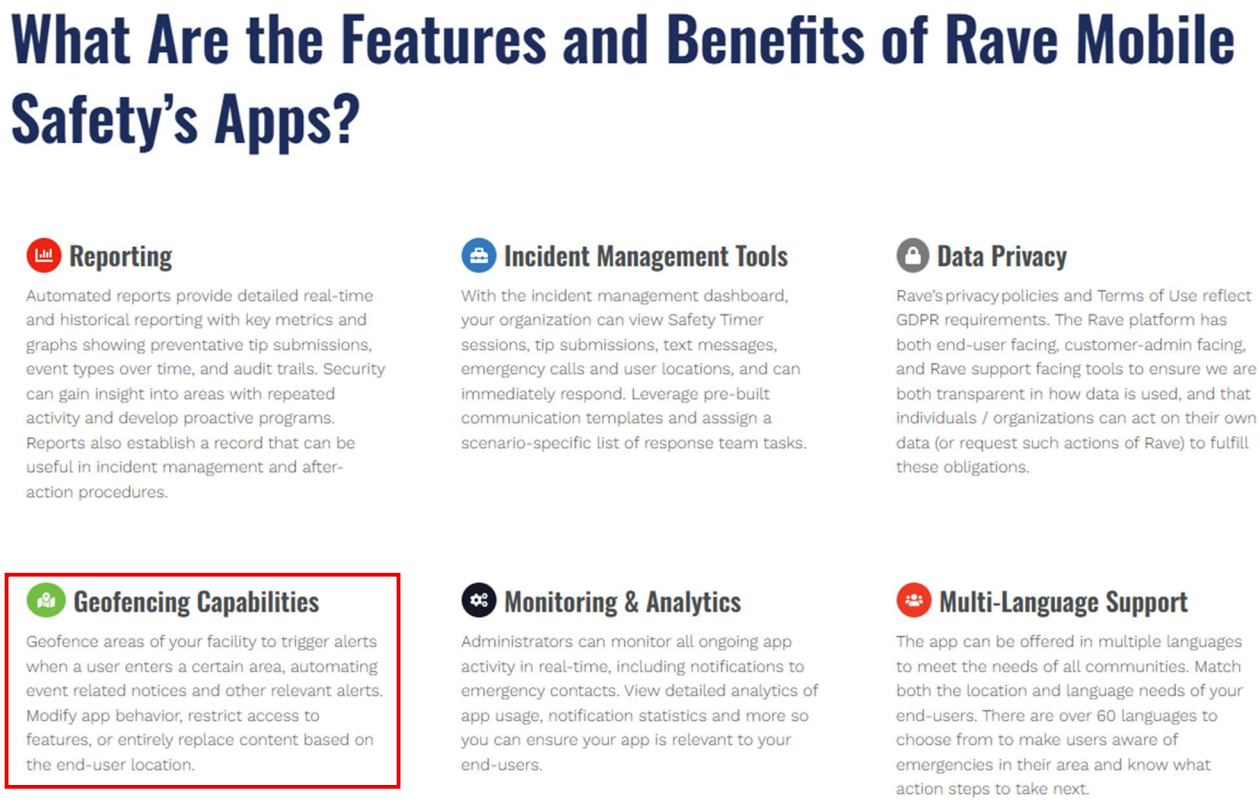
28. On information and belief, each Infringing Product is configured to analyze the geographical location based on the security parameters. For example, as discussed above, the

Infringing Products analyze the geographical information to provide "detailed mapping," share information with 911 responders, and provide evacuation routes for emergencies.

29. On information and belief, each Infringing Product is configured to generate a geofence corresponding to a geographical area. For example, the Infringing Products generate geofences based on "building[s] in the system"—*i.e.*, geographical locations uploaded as discussed above:

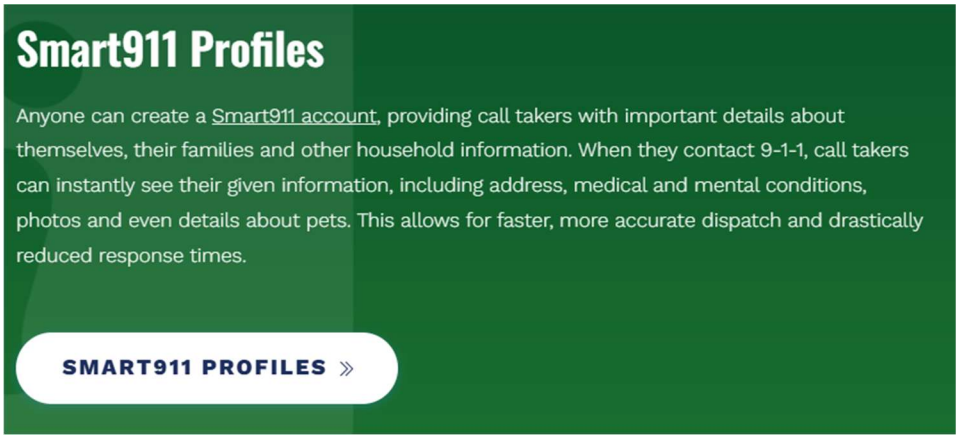


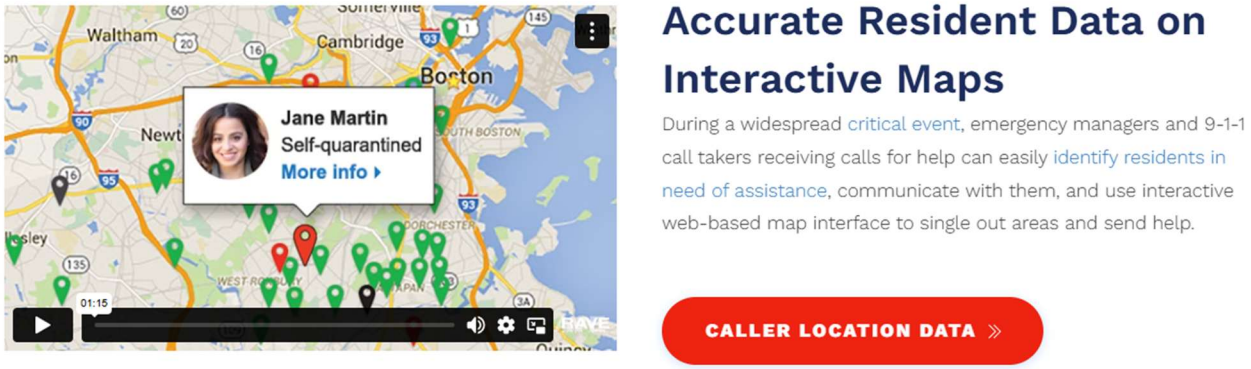
Source: *Rave Facility*, RAVE MOBILE SAFETY.



Source: *Rave Mobile Safety Apps*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/products/rave-mobile-safety-apps/ (last visited July 20, 2026).

30. On information and belief, each Infringing Product is configured to receive supervisee data. For example, the Infringing Products can receive supervisee data such as "Smart911 Profiles" that comprise data uploaded by an emergency caller to Rave's cloud-based web app:

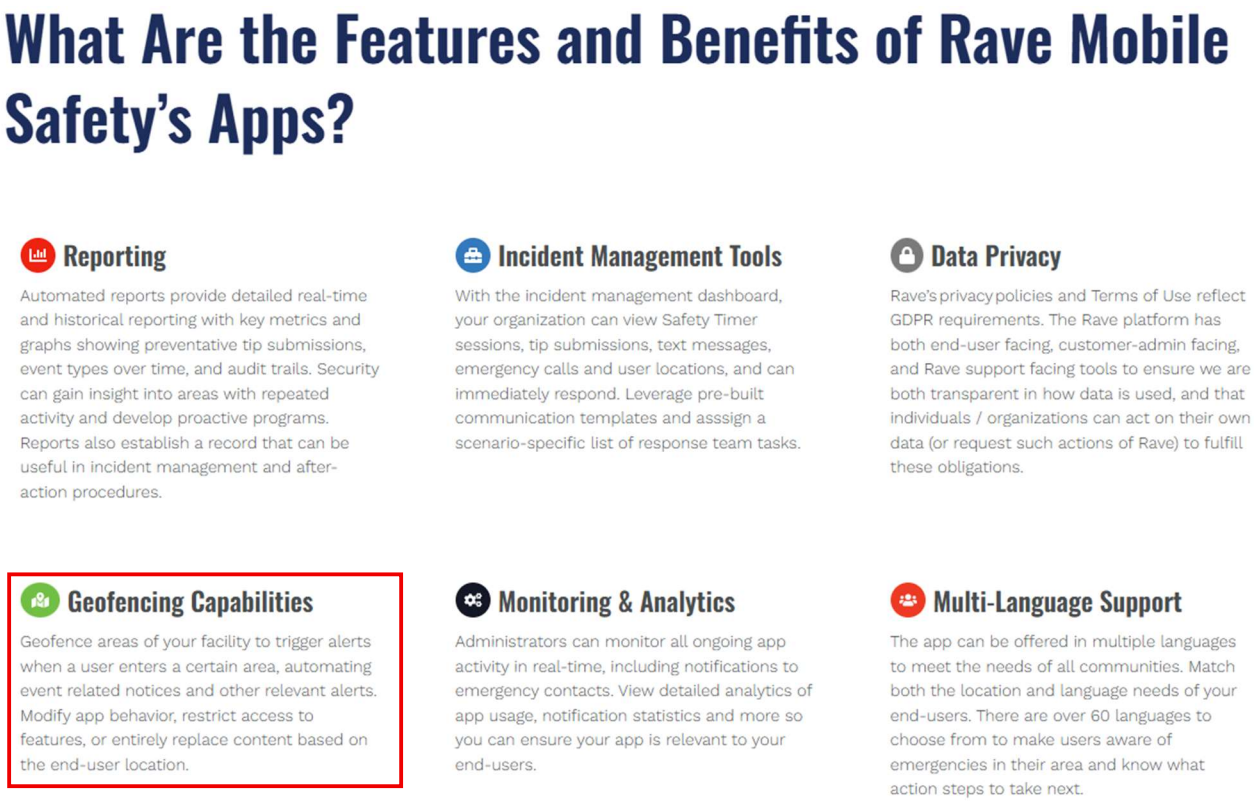




Source: *Rave 911 Suite*, MOTOROLA SOLUTIONS, https://www.ravemobilesafety.com/products/rave-911-suite-smart911/ (last visited July 15, 2026).

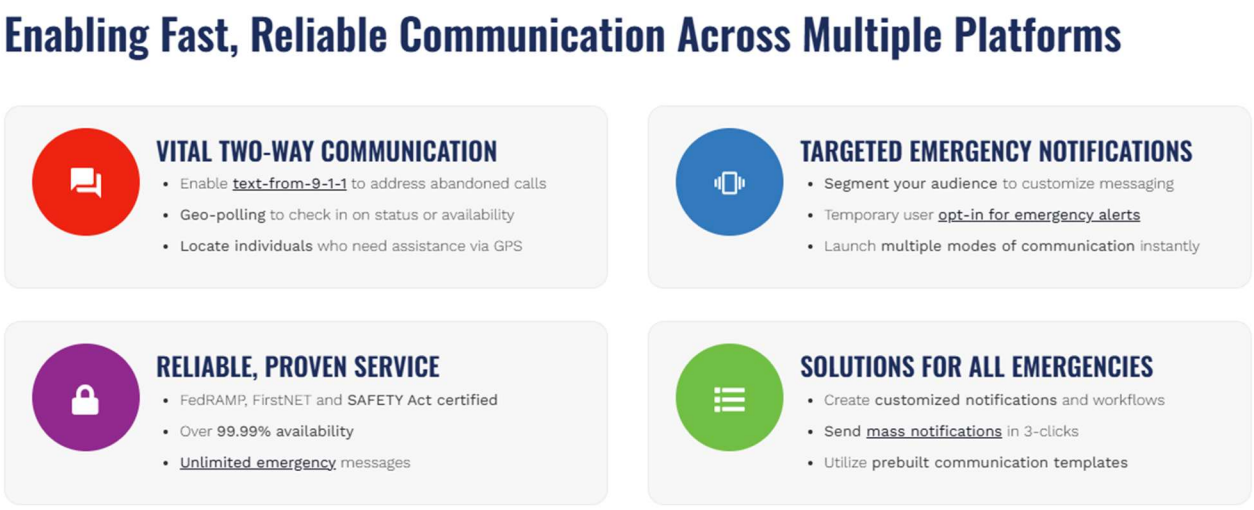
Source: *Smart911 Profiles*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/products/smart911-profiles/ (last visited July 15, 2026).

31. On information and belief, the Infringing Products are configured to analyze the supervisee data based on the geofence. For example, as discussed above, the Infringing Products can analyze supervisee data such as Smart911 profiles based on a supervisee's location, including within a geofence. As another example, the Infringing Products can analyze and adjust a supervisee's accessible features or available content based on their location within a geofence:



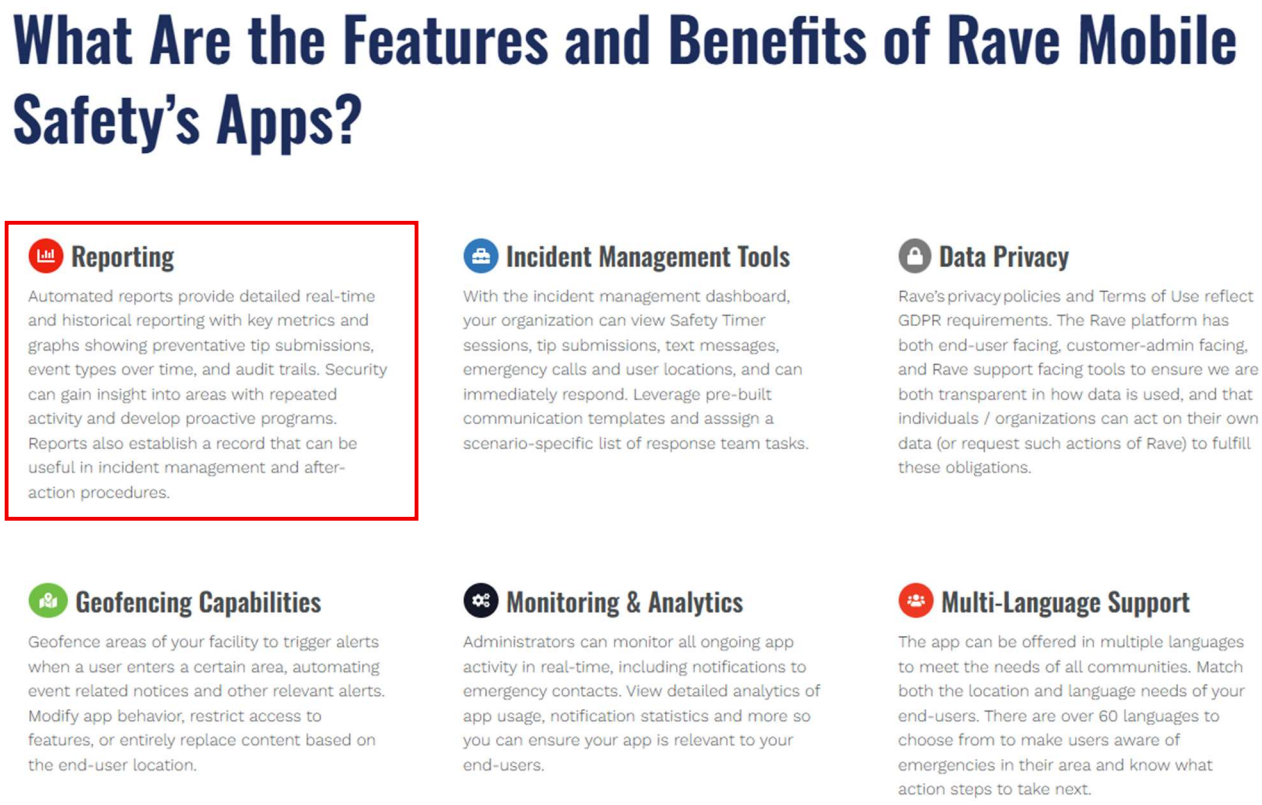
Source: *Rave Mobile Safety Apps*, RAVE MOBILE SAFETY.

32. On information and belief, the Infringing Products generate supervision notifications based on the analysis and transmit notifications to supervisor devices. For example, the Infringing Products generate notifications that are targeted and customized based on an analysis of, *e.g.*, supervisee status, location, or availability:



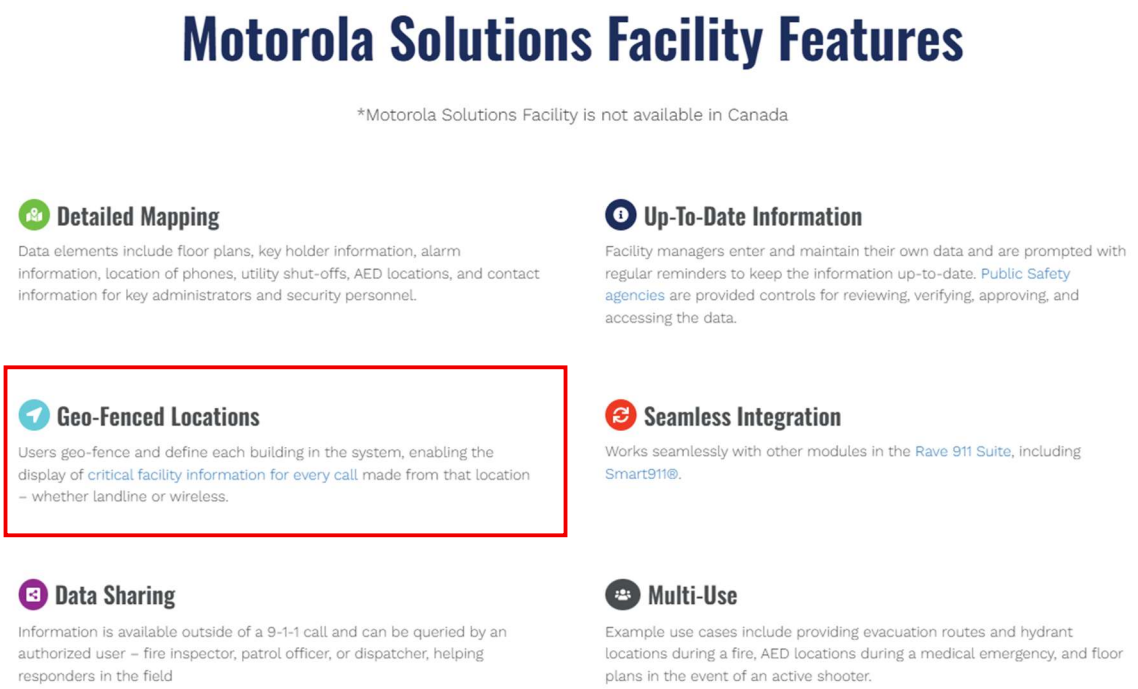
Source: *Emergency Notification System*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/solutions/emergency-notification-system/ (last visited July 15, 2026).

33. On information and belief, each Infringing Product stores the supervisee data and supervision notifications. For example, the Infringing Products comprise reporting features that automatically create "detailed real-time and historical reporting with key metrics and graphs" relating to security and events:



Source: *Rave Mobile Safety Apps*, RAVE MOBILE SAFETY.

34. On information and belief, each Infringing Product also generates a geofence that is characterized by a geofence area corresponding to the geographical area and comprises geofence grid boxes within the geofenced area. For example, as discussed above, the Infringing Products utilize geofencing:



Source: *Rave Facility*, RAVE MOBILE SAFETY.

35. Additionally, on information and belief, Rave enhances its grid-based geofencing via its partnership with Critical Response Group ("CRG") to incorporate CRG's Collaborative Response Graphics into the Rave Mobile Safety Suite:

RAVE
MOBILE SAFETY

Rave Mobile Safety integrates Collaborative Response Graphics® into Mass Notification and Panic Button Systems

Mass Notification Systems for Schools by Rave Mobile Safety works with Critical Response Group® mapping solutions

Rave Mobile Safety integrates with Collaborative Response Graphics® from Critical Response Group to deliver mass notification and panic button systems, enhancing emergency response for schools and businesses.

Source: *Rave Mobile Safety*, CRG.

36. CRG advertises the grid-based nature of the geofencing as a key feature of the Collaborative Response Graphics provided to Rave, including a "gridded reference system" created by incorporating "key landmarks," "critical features," "site specific labels," "aerial imagery," and other parameters for determining how to establish the grid:

LAYER BREAKDOWN

Creating a Unified Map, Inside and Out

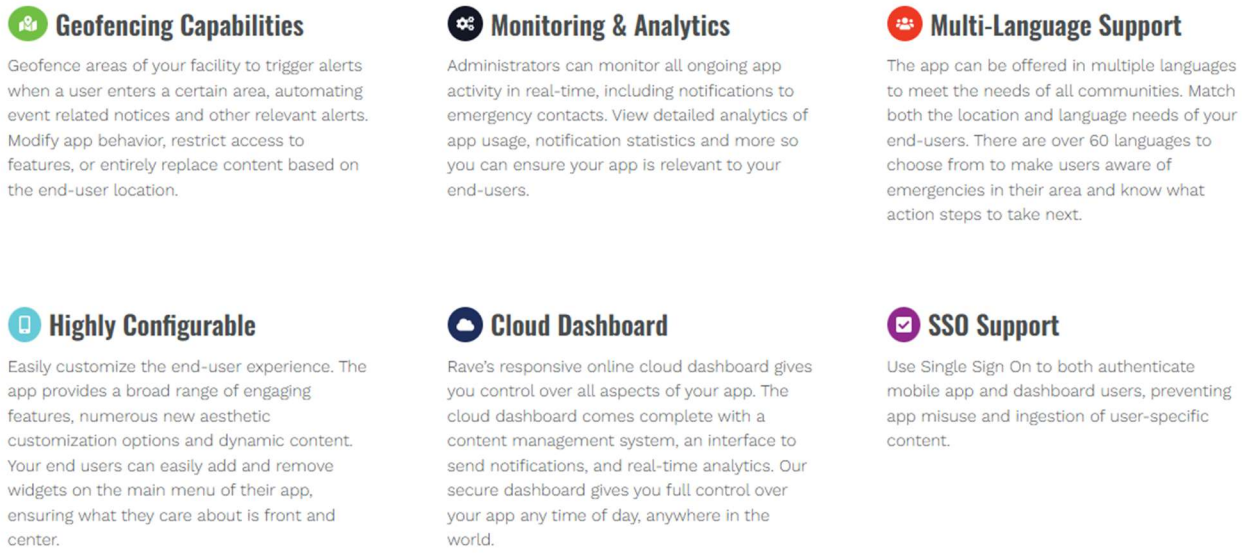
CRGs combine a gridded reference system, high-resolution imagery, floor plans, and critical features within a building and surrounding exterior areas to create a communication tool that is usable in a crisis and accessible by first responders through any smart device.

1. Grid & Template
2. Key Landmarks & Critical Features (AED, Gas, etc)
3. Site Specific Labels and Nomenclature
4. Highlighted Hallways, Stairwells, Doors, Exits
5. GeoRelevant Integrated Floorplans
6. Best Available Aerial Imagery

Source: *Collaborative Response Graphics* ®, CRG.

37. On information and belief, the Infringing Products are configured to receive and analyze at least one grid parameter. For example, as discussed above, the Infringing Products use geographical and security information associated with a gridded reference system (*i.e.*, grid parameters) gathered and created through the Collaborative Response Graphics technology Rave obtained via its partnership with CRG.

38. On information and belief, the Infringing Products are configured to determine a grid box geofence area based on the grid parameters, and generate geofence grid boxes accordingly. For example, Rave advertises that the Infringing Products' geofencing capabilities can be modified and that supervisors have "control over all aspects" of the Infringing Products via the Cloud Dashboard, indicating that geofence grid boxes can be generated or adjusted when geofences are generated or modified:



Source: *Rave Mobile Safety Apps*, RAVE MOBILE SAFETY.

39. On information and belief, the steps described above are performed by Defendant's cloud-based platform, which is hosted by Amazon Web Services ("AWS") cloud-computing servers to be used by "thousands" of customers in the United States. *See Rave Mobile Safety Suite*, MOTOROLA SOLUTIONS, https://www.motorolasolutions.com/en_us/products/command-center-software/rave.html (last visited July 19, 2026). AWS has 6 data center clusters in the U.S. that cover 25 U.S. "availability zones." *See Regions and Availability Zones*, AWS, https://aws.amazon.com/about-aws/global-infrastructure/regions_az/ (last visited July 19, 2026).

40. Defendant has been and is now directly infringing, literally and/or under the doctrine of equivalents because without authority it makes, uses, offers to sell, sells, and/or imports within the United States the patented invention of one or more claims, including at least claim 1 of the '757 Patent. Defendant is therefore liable to Samscloud for patent infringement under 35 U.S.C. § 271(a).

41. Further, Defendant's customers and end users who offer for sale, sell, and/or use the Infringing Products directly infringe at least claim 1 of the '757 Patent.

42. Furthermore, Defendant has been and is now liable under 35 U.S.C. § 271(b) for actively inducing infringement of one or more claims including at least claim 1 of the '757 Patent. Rave has had actual notice of the '757 Patent since at least its receipt of Samscloud's complaint. Despite such knowledge, Rave has intended that its customers and end users infringe the '757 Patent by selling, offering for sale, importing, and/or using the Infringing Products in the United States, and has actively induced such infringement by instructing users in the United States to practice '757 Patent claims in their user manuals, posted videos and/or other materials with knowledge of the '757 Patent as set forth in this complaint and with knowledge of the '757 Patent since at least the time Rave became aware of the '757 Patent.

43. As a result of Defendant's infringement of the '757 Patent, Samscloud has suffered and continues to suffer damages. Thus, Samscloud is entitled to recover from Defendant the damages Samscloud sustained as a result of Defendant's wrongful and infringing acts in an amount no less than a reasonable royalty, together with interest and costs fixed by this Court under 35 U.S.C. § 284.

44. Defendant's infringement of the '757 Patent was, is, and continues to be deliberate and willful. Moreover, Rave was and is on notice of the '757 Patent at least as early as the filing of the Complaint in this lawsuit, yet continued and continues to infringe the '757 Patent.

COUNT II

(Infringement of the '421 Patent)

45. Plaintiff incorporates and re-alleges the allegations contained in paragraphs 1 through 44 herein by reference.

46. The '421 Patent entitled "Systems and methods for facilitating supervision of individuals based on geofencing" was duly and legally issued by the U.S. Patent and Trademark Office on November 26, 2024, from Application No. 18/045,781, published at US2023/0056959 on February 23, 2023. The '421 Patent is a continuation-in-part of the '757 Patent and also claims priority to provisional application 62/814,097 filed on March 5, 2019. A true and accurate copy of the '421 Patent is attached hereto as Exhibit B.

47. Each and every claim of the '421 Patent is valid and enforceable, and each enjoys a statutory presumption of validity under 35 U.S.C. § 282.

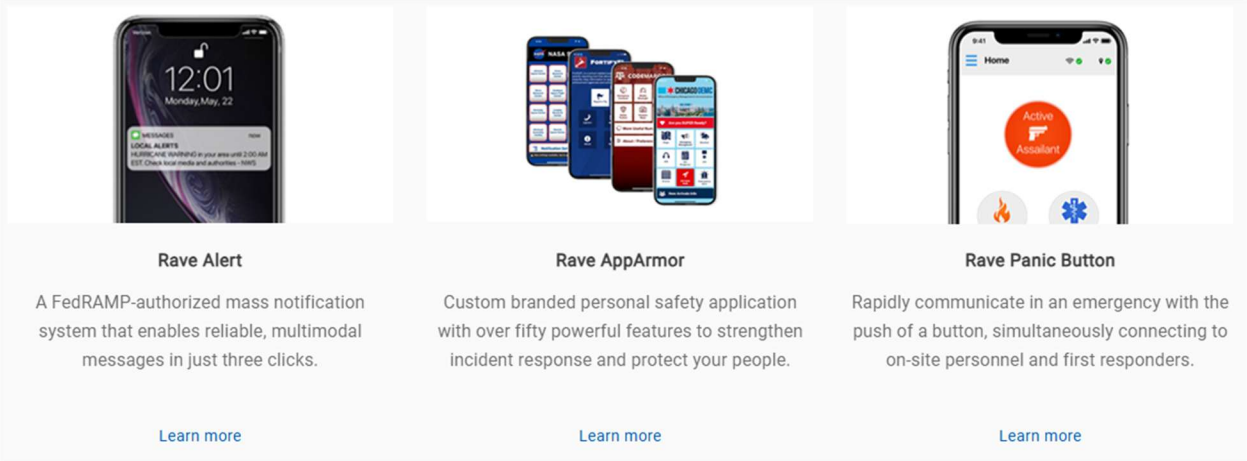
48. Samscloud exclusively owns all rights, title, and interest in and to the '421 Patent and possesses the exclusive right of recovery, including the exclusive right to recover for past, present, and future infringement.

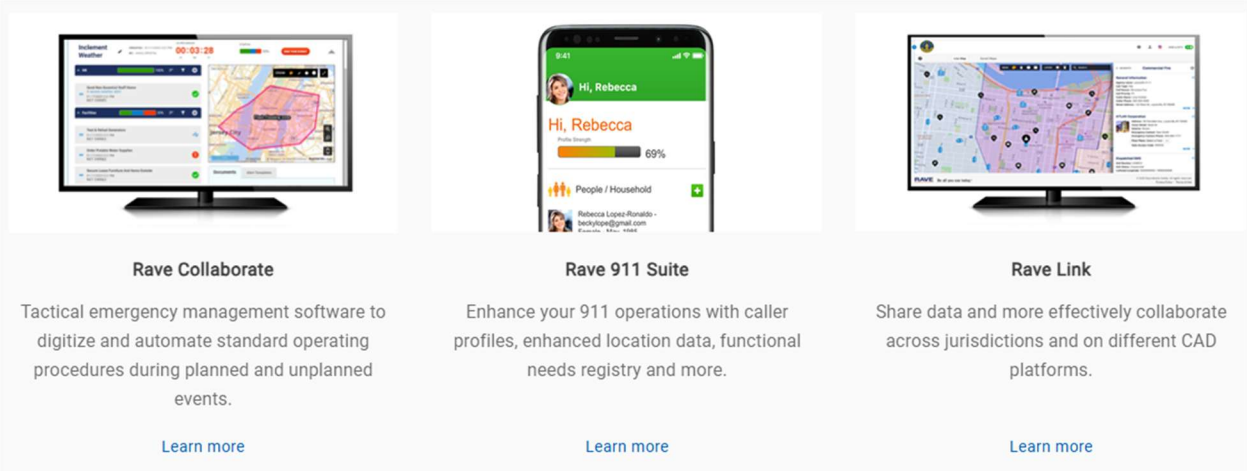
49. Claim 1 of the '421 Patent recites:

> A method for facilitating supervision of individuals based on geofencing, the method comprising:
> receiving, using a communication device, at least one security parameter from at least one supervisor device associated with at least one supervisor;
> receiving, using the communication device, a geographical location from the at least one supervisor device;
> analyzing, using a processing device, the geographical location based on the at least one security parameter;
> generating, using the processing device, a geofence corresponding to a geographical area based on the analyzing;

receiving, using the communication device, at least one supervisee data associated with a supervisee from at least one supervisee device;
analyzing, using the processing device, the at least one supervisee data based on the geofence;
generating, using the processing device, a supervision notification based on the analyzing of the at least one supervisee data;
transmitting, using the communication device, the supervision notification to the at least one supervisor device; and
storing, using a storage device, the at least one supervisee data and the supervision notification, wherein:
the geofence is characterized by a geofence area corresponding to the geographical area, wherein the geofence comprises a plurality of geofence grid boxes associated with the geofence area, wherein each geofence grid box is characterized by a grid box geofence area of the geofence area, wherein the method comprises:
receiving, using the communication device, at least one grid parameter from the at least one supervisor device,
analyzing, using the processing device, the at least one grid parameter;
determining, using the processing device, the grid box geofence area based on the analyzing of the at least one grid parameter; and
generating, using the processing device, a number of geofence grid boxes based on the determining.

50. Each Infringing Product is configured to perform a method for facilitating supervision of individuals. For example, Rave's Mobile Safety Suite provides multiple integrated features for supervising individuals and assisting in emergency response:





Source: *Rave Mobile Safety Suite*, MOTOROLA SOLUTIONS, https://www.motorolasolutions.com/en_us/products/command-center-software/rave.html (last visited July 15, 2026).

51. Further, on information and belief, the methods performed by the Infringing Products are based on geofencing. For example, the Motorola Solutions Facility module of the Rave 911 Suite utilizes geofencing to facilitate emergency services:

Source: *Rave Facility*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/products/rave-facility/ (last visited July 15, 2026).

52. On information and belief, each Infringing Product is configured to receive security parameters from supervisor devices. For example, facility managers (*i.e.*, supervisors) can upload and maintain data for emergency response, including parameters relating to safety hazards and other emergency response information:

Motorola Solutions Facility Features

*Motorola Solutions Facility is not available in Canada

Detailed Mapping

Data elements include floor plans, key holder information, alarm information, location of phones, utility shut-offs, AED locations, and contact information for key administrators and security personnel.

Up-To-Date Information

Facility managers enter and maintain their own data and are prompted with regular reminders to keep the information up-to-date. Public Safety agencies are provided controls for reviewing, verifying, approving, and accessing the data.

Geo-Fenced Locations

Users geo-fence and define each building in the system, enabling the display of critical facility information for every call made from that location – whether landline or wireless.

Seamless Integration

Works seamlessly with other modules in the Rave 911 Suite, including Smart911®.

Data Sharing

Information is available outside of a 9-1-1 call and can be queried by an authorized user – fire inspector, patrol officer, or dispatcher, helping responders in the field

Multi-Use

Example use cases include providing evacuation routes and hydrant locations during a fire, AED locations during a medical emergency, and floor plans in the event of an active shooter.

Benefits of Motorola Solutions Facility

Improves the speed and efficiency of emergency response by providing critical information and enhancing communications with facility personnel.

Enhances responder safety with access codes, hazard locations, and floor plans

Reduces the cost and overhead of maintaining accurate facility information by enabling online "crowdsourcing"

Facilitates inter-agency collaboration between public safety and business and facility managers who work off the same data set and emergency preparedness plans

Up to date and accurate data seamlessly available to responders, 911, fire inspectors, and other key personnel

Source: *Rave Facility*, RAVE MOBILE SAFETY.

What Are the Most Popular Features of the Rave 911 Suite?

The Rave 911 Suite provides emergency response professionals with crucial functionality:

- **Critical 9-1-1 Caller Info:** View the caller's name and address, medical conditions, photos, pets and household members through Smart911, or use notes to identify frequent callers.
- **Two-Way Communication:** Initiate two-way text messaging and live-streaming video from first responders and on-scene bystanders.
- **Enhanced Location Data:** Supplement existing automatic location identification (ALI) information with improved e911 location tracking, and access floor plans and other facility information.
- **Access & Functional Needs Registry:** Connect to a web-based, resident-sourced access and functional needs population registry as necessary for analysis, planning and emergency response.

Source: *How the Rave 911 Suite and Smart911 Protect Schools and Communities*, MOTOROLA SOLUTIONS, https://blog.motorolasolutions.com/en_us/rave-911-suite-smart911-schools/ (Jan. 18, 2022; archived Dec. 5, 2025).

53. On information and belief, each Infringing Product is also configured to receive geographical locations from supervisor devices. For example, supervisors accessing the Infringing Products can upload information, including geographical locations and floor plans, to Rave's cloud-based web app:

Motorola Solutions Facility Features

*Motorola Solutions Facility is not available in Canada

Detailed Mapping
Data elements include floor plans, key holder information, alarm information, location of phones, utility shut-offs, AED locations, and contact information for key administrators and security personnel.

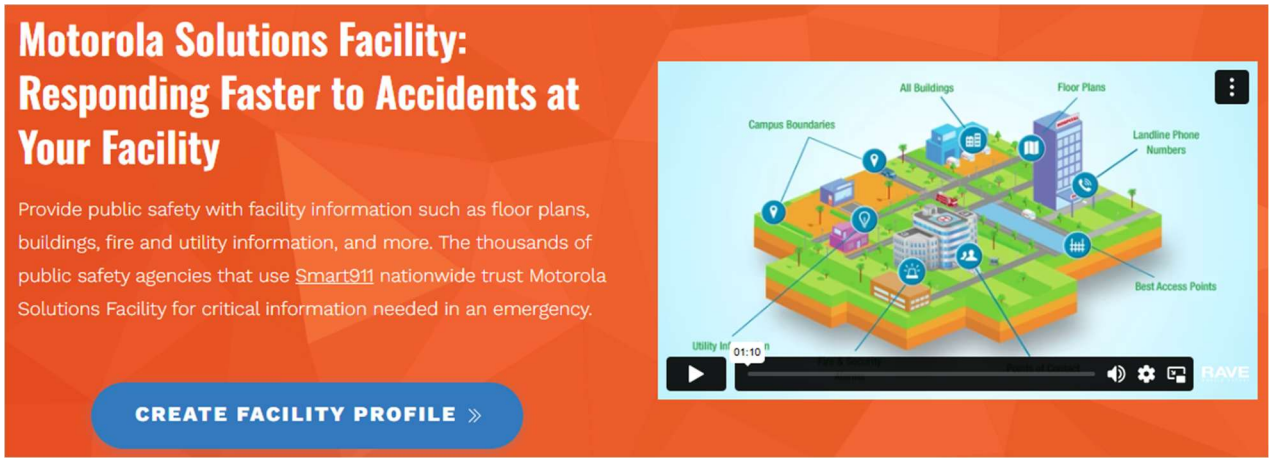
Up-To-Date Information
Facility managers enter and maintain their own data and are prompted with regular reminders to keep the information up-to-date. Public Safety agencies are provided controls for reviewing, verifying, approving, and accessing the data.

Geo-Fenced Locations
Users geo-fence and define each building in the system, enabling the display of critical facility information for every call made from that location – whether landline or wireless.

Seamless Integration
Works seamlessly with other modules in the Rave 911 Suite, including Smart911®.

Data Sharing
Information is available outside of a 9-1-1 call and can be queried by an authorized user – fire inspector, patrol officer, or dispatcher, helping responders in the field

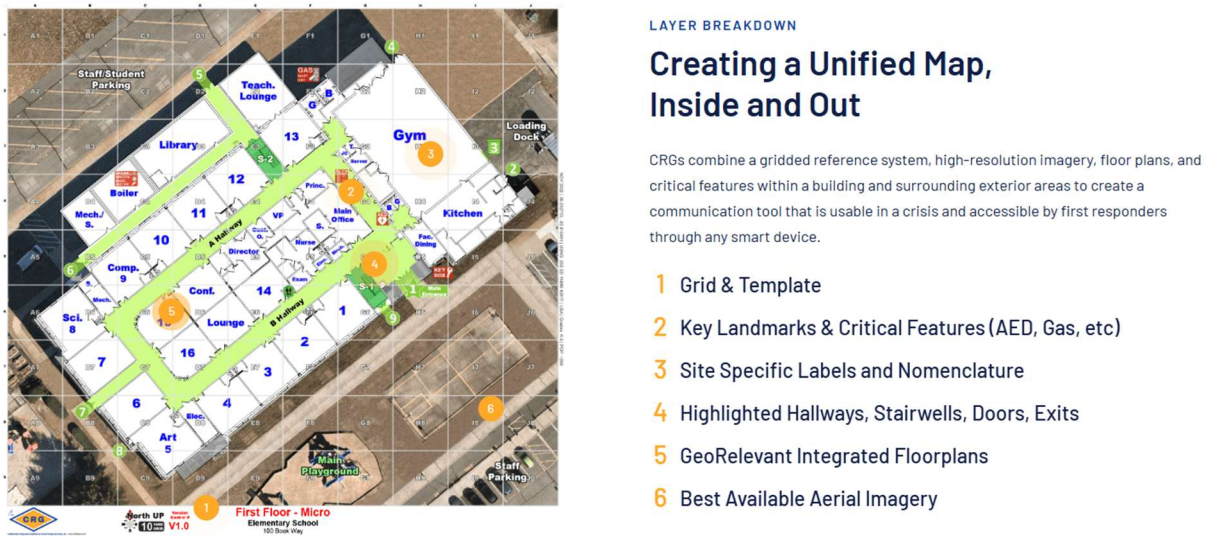
Multi-Use
Example use cases include providing evacuation routes and hydrant locations during a fire, AED locations during a medical emergency, and floor plans in the event of an active shooter.



Source: *Rave Facility*, RAVE MOBILE SAFETY.

54. As another example, Rave has partnered with Critical Response Group ("CRG") to integrate CRG's "Collaborative Response Graphics" and utilize "GeoRelevant integrated floor plans" and geospatial data (*i.e.*, geographical locations) to provide detailed maps and location information for emergency response:

Source: *Rave Mobile Safety*, CRG, https://www.crgplans.com/integrations/rave-mobile-safety/ (last visited July 15, 2026).



Source: *Collaborative Response Graphics* ®, CRG, https://www.crgplans.com/collaborative-response-graphics/ (last visited July 15, 2026).

55. On information and belief, each Infringing Product is configured to analyze the geographical location based on the security parameters. For example, as discussed above, the Infringing Products analyze the geographical information to provide "detailed mapping," share information with 911 responders, and provide evacuation routes for emergencies.

56. On information and belief, each Infringing Product is configured to generate a geofence corresponding to a geographical area. For example, the Infringing Products generate geofences based on "building[s] in the system"—*i.e.*, geographical locations uploaded as discussed above:

Motorola Solutions Facility Features

*Motorola Solutions Facility is not available in Canada

Detailed Mapping

Data elements include floor plans, key holder information, alarm information, location of phones, utility shut-offs, AED locations, and contact information for key administrators and security personnel.

Up-To-Date Information

Facility managers enter and maintain their own data and are prompted with regular reminders to keep the information up-to-date. Public Safety agencies are provided controls for reviewing, verifying, approving, and accessing the data.

Geo-Fenced Locations

Users geo-fence and define each building in the system, enabling the display of critical facility information for every call made from that location – whether landline or wireless.

Seamless Integration

Works seamlessly with other modules in the Rave 911 Suite, including Smart911®.

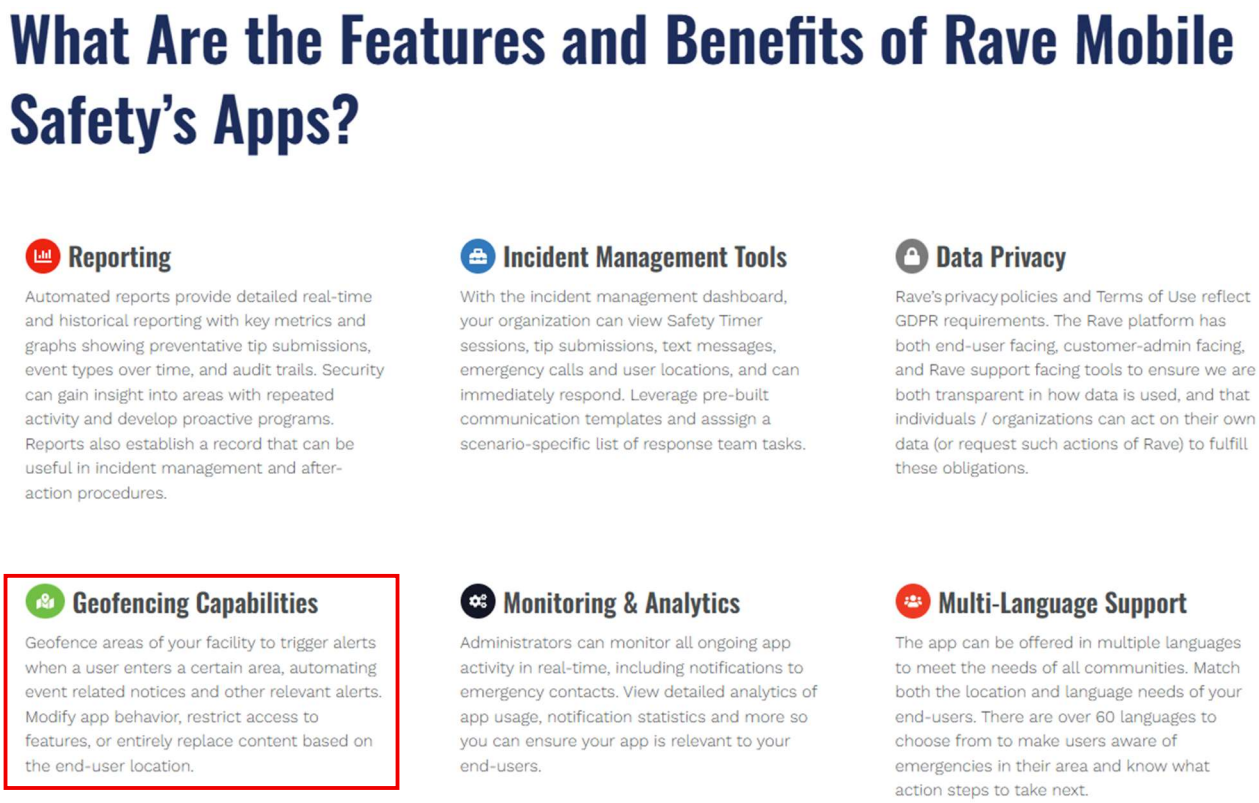
Data Sharing

Information is available outside of a 9-1-1 call and can be queried by an authorized user – fire inspector, patrol officer, or dispatcher, helping responders in the field

Multi-Use

Example use cases include providing evacuation routes and hydrant locations during a fire, AED locations during a medical emergency, and floor plans in the event of an active shooter.

Source: *Rave Facility*, RAVE MOBILE SAFETY.



What Are the Features and Benefits of Rave Mobile Safety's Apps?

Reporting

Automated reports provide detailed real-time and historical reporting with key metrics and graphs showing preventative tip submissions, event types over time, and audit trails. Security can gain insight into areas with repeated activity and develop proactive programs. Reports also establish a record that can be useful in incident management and after-action procedures.

Incident Management Tools

With the incident management dashboard, your organization can view Safety Timer sessions, tip submissions, text messages, emergency calls and user locations, and can immediately respond. Leverage pre-built communication templates and asssign a scenario-specific list of response team tasks.

Data Privacy

Rave's privacy policies and Terms of Use reflect GDPR requirements. The Rave platform has both end-user facing, customer-admin facing, and Rave support facing tools to ensure we are both transparent in how data is used, and that individuals / organizations can act on their own data (or request such actions of Rave) to fulfill these obligations.

Geofencing Capabilities

Geofence areas of your facility to trigger alerts when a user enters a certain area, automating event related notices and other relevant alerts. Modify app behavior, restrict access to features, or entirely replace content based on the end-user location.

Monitoring & Analytics

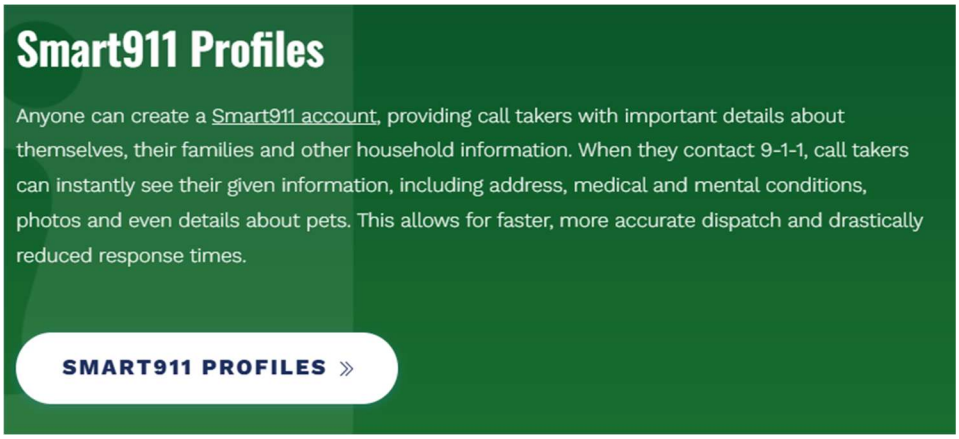
Administrators can monitor all ongoing app activity in real-time, including notifications to emergency contacts. View detailed analytics of app usage, notification statistics and more so you can ensure your app is relevant to your end-users.

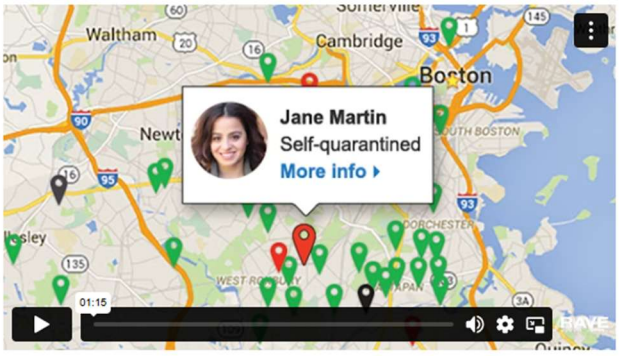
Multi-Language Support

The app can be offered in multiple languages to meet the needs of all communities. Match both the location and language needs of your end-users. There are over 60 languages to choose from to make users aware of emergencies in their area and know what action steps to take next.

Source: *Rave Mobile Safety Apps*, RAVE MOBILE SAFETY.

57. On information and belief, each Infringing Product is configured to receive supervisee data. For example, the Infringing Products can receive supervisee data such as "Smart911 Profiles" that comprise data uploaded by an emergency caller to Rave's cloud-based web app:





Accurate Resident Data on Interactive Maps

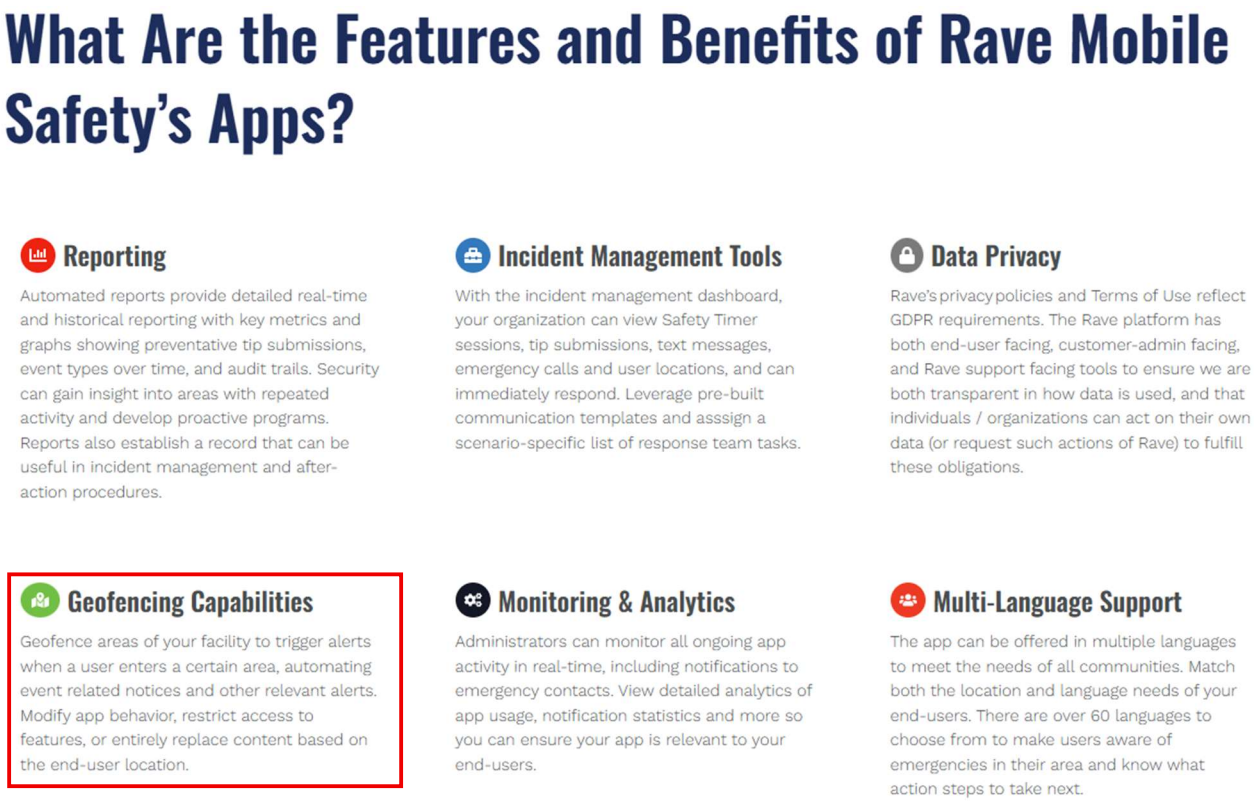
During a widespread critical event, emergency managers and 9-1-1 call takers receiving calls for help can easily identify residents in need of assistance, communicate with them, and use interactive web-based map interface to single out areas and send help.

CALLER LOCATION DATA »

Source: *Rave 911 Suite*, MOTOROLA SOLUTIONS, https://www.ravemobilesafety.com/products/rave-911-suite-smart911/ (last visited July 15, 2026).

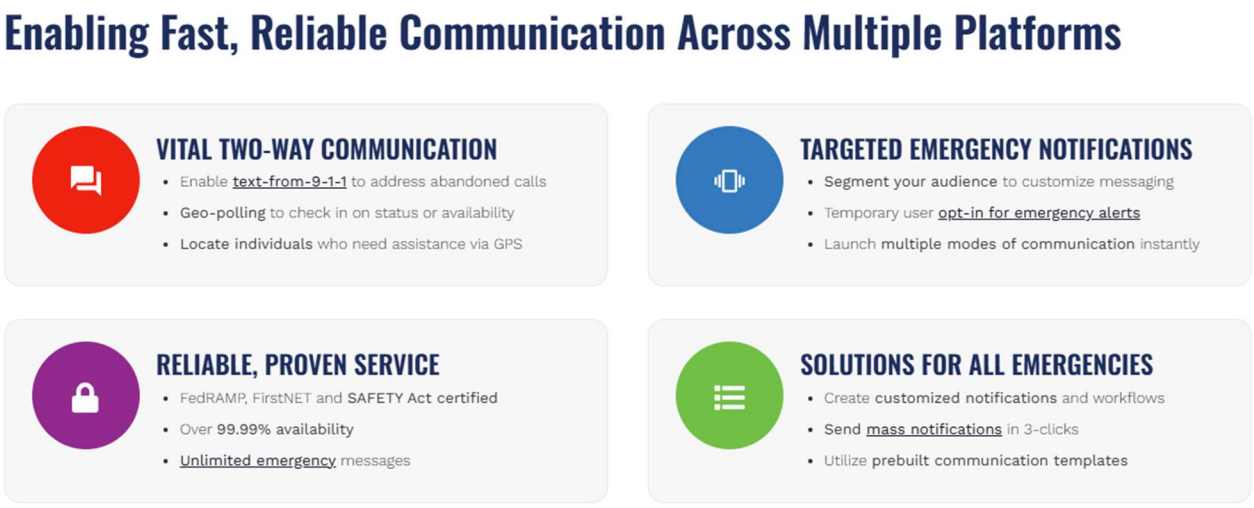
Source: *Smart911 Profiles*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/products/smart911-profiles/ (last visited July 15, 2026).

58. On information and belief, the Infringing Products are configured to analyze the supervisee data based on the geofence. For example, as discussed above, the Infringing Products can analyze supervisee data such as Smart911 profiles based on a supervisee's location, including within a geofence. As another example, the Infringing Products can analyze and adjust a supervisee's accessible features or available content based on their location within a geofence:



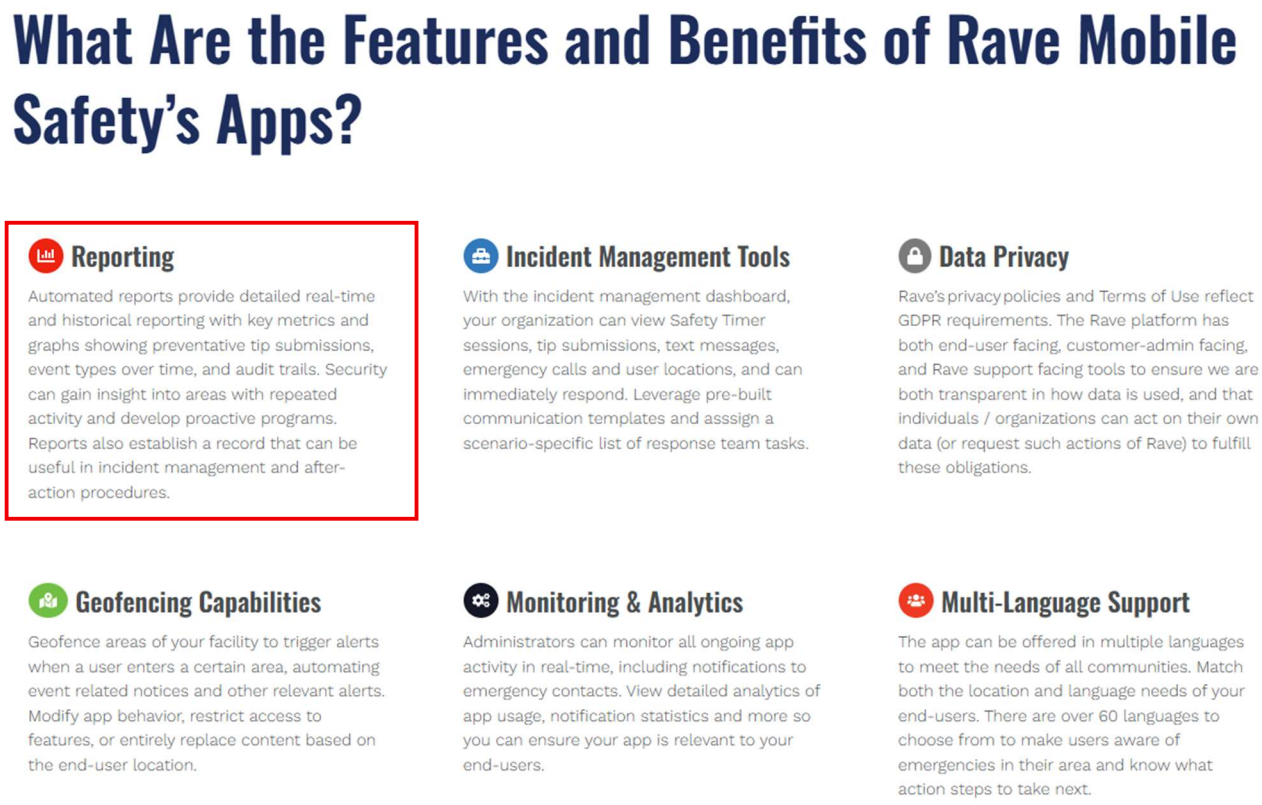
Source: *Rave Mobile Safety Apps*, RAVE MOBILE SAFETY.

59. On information and belief, the Infringing Products generate supervision notifications based on the analysis and transmit notifications to supervisor devices. For example, the Infringing Products generate notifications that are targeted and customized based on an analysis of, *e.g.*, supervisee status, location, or availability:



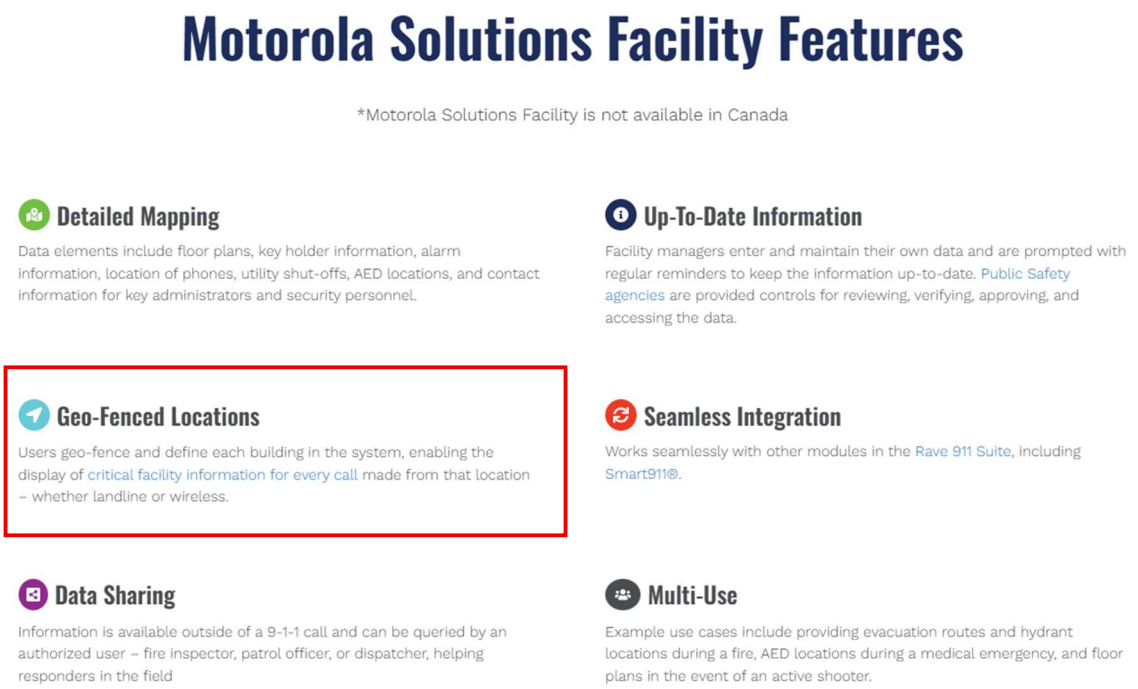
Source: *Emergency Notification System*, RAVE MOBILE SAFETY, https://www.ravemobilesafety.com/solutions/emergency-notification-system/ (last visited July 15, 2026).

60. On information and belief, each Infringing Product stores the supervisee data and supervision notifications. For example, the Infringing Products comprise reporting features that automatically create "detailed real-time and historical reporting with key metrics and graphs" relating to security and events:



Source: *Rave Mobile Safety Apps*, RAVE MOBILE SAFETY.

61. On information and belief, each Infringing Product also generates a geofence that is characterized by a geofence area corresponding to the geographical area and comprises geofence grid boxes within the geofenced area. For example, as discussed above, the Infringing Products utilize geofencing:



Source: *Rave Facility*, RAVE MOBILE SAFETY.

62. Additionally, on information and belief, Rave enhances its grid-based geofencing via its partnership with Critical Response Group ("CRG") with Critical Response Group ("CRG") to incorporate CRG's Collaborative Response Graphics into the Rave Mobile Safety Suite:

RAVE
MOBILE SAFETY

Rave Mobile Safety integrates Collaborative Response Graphics® into Mass Notification and Panic Button Systems

Mass Notification Systems for Schools by Rave Mobile Safety works with Critical Response Group® mapping solutions

Rave Mobile Safety integrates with Collaborative Response Graphics® from Critical Response Group to deliver mass notification and panic button systems, enhancing emergency response for schools and businesses.

Source: *Rave Mobile Safety*, CRG.

63. CRG advertises the grid-based nature of the geofencing as a key feature of the Collaborative Response Graphics provided to Rave, including a "gridded reference system" created by incorporating "key landmarks," "critical features," "site specific labels," "aerial imagery," and other parameters for determining how to establish the grid:

LAYER BREAKDOWN

Creating a Unified Map, Inside and Out

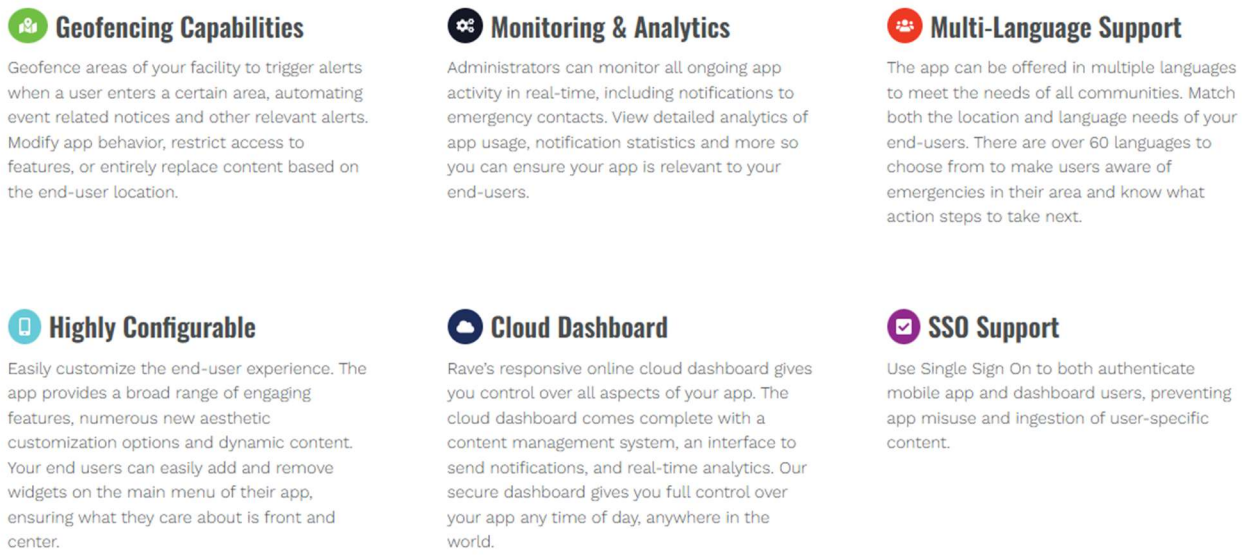
CRGs combine a gridded reference system, high-resolution imagery, floor plans, and critical features within a building and surrounding exterior areas to create a communication tool that is usable in a crisis and accessible by first responders through any smart device.

1. Grid & Template
2. Key Landmarks & Critical Features (AED, Gas, etc)
3. Site Specific Labels and Nomenclature
4. Highlighted Hallways, Stairwells, Doors, Exits
5. GeoRelevant Integrated Floorplans
6. Best Available Aerial Imagery

Source: *Collaborative Response Graphics* ®, CRG.

64. On information and belief, the Infringing Products are configured to receive and analyze at least one grid parameter. For example, as discussed above, the Infringing Products use geographical and security information associated with a gridded reference system (*i.e.*, grid parameters) gathered and created through the Collaborative Response Graphics technology Rave obtained via its partnership with CRG.

65. On information and belief, the Infringing Products are configured to determine a grid box geofence area based on the grid parameters, and generate geofence grid boxes accordingly. For example, Rave advertises that the Infringing Products' geofencing capabilities can be modified and that supervisors have "control over all aspects" of the Infringing Products via the Cloud Dashboard, indicating that geofence grid boxes can be generated or adjusted when geofences are generated or modified:



Source: *Rave Mobile Safety Apps*, RAVE MOBILE SAFETY.

66. On information and belief, the steps described above are performed by Defendant's cloud-based platform, which is hosted by Amazon Web Services ("AWS") cloud-computing servers to be used by "thousands" of customers in the United States. *See Rave Mobile Safety Suite*, MOTOROLA SOLUTIONS, https://www.motorolasolutions.com/en_us/products/command-center-software/rave.html (last visited July 19, 2026). AWS has 6 data center clusters in the U.S. that cover 25 U.S. "availability zones." *See Regions and Availability Zones*, AWS, https://aws.amazon.com/about-aws/global-infrastructure/regions_az/ (last visited July 19, 2026).

67. Defendant has been and is now directly infringing, literally and/or under the doctrine of equivalents because without authority it makes, uses, offers to sell, sells, and/or imports within the United States the patented invention of one or more claims, including at least claim 1 of the ’421 Patent. Defendant is therefore liable to Samscloud for patent infringement under 35 U.S.C. § 271(a).

68. Further, Defendant’s customers and end users who offer for sale, sell, and/or use the Infringing Products directly infringe at least claim 1 of the ’421 Patent.

69. Furthermore, Defendant has been and is now liable under 35 U.S.C. § 271(b) for actively inducing infringement of one or more claims including at least claim 1 of the ’421 Patent. Rave has had actual notice of the ’421 Patent since at least its receipt of Samscloud’s complaint. Despite such knowledge, Rave has intended that its customers and end users infringe the ’421 Patent by selling, offering for sale, importing, and/or using the Infringing Products in the United States, and has actively induced such infringement by instructing users in the United States to practice ’421 Patent claims in their user manuals, posted videos and/or other materials with knowledge of the ’421 Patent as set forth in this complaint and with knowledge of the ’421 Patent since at least the time Rave became aware of the ’421 Patent.

70. As a result of Defendant’s infringement of the ’421 Patent, Samscloud has suffered and continues to suffer damages. Thus, Samscloud is entitled to recover from Defendant the damages Samscloud sustained as a result of Defendant’s wrongful and infringing acts in an amount no less than a reasonable royalty, together with interest and costs fixed by this Court under 35 U.S.C. § 284.

71. Defendant's infringement of the '421 Patent was, is, and continues to be deliberate and willful. Moreover, Rave was and is on notice of the '421 Patent at least as early as the filing of the Complaint in this lawsuit, yet continued and continues to infringe the '421 Patent.

CONCLUSION

72. Defendant has directly and/or indirectly infringed on Plaintiff's rights as owner of the Asserted Patents. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court.

73. Plaintiff has incurred and will incur attorneys' fees, costs, and expenses in the prosecution of this action. The circumstances of this dispute may give rise to an exceptional case within the meaning of 35 U.S.C. § 285, and Plaintiff is entitled to recover its reasonable and necessary attorneys' fees, costs, and expenses.

JURY DEMAND

74. Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

75. Plaintiff requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

1. A judgment that Defendant has infringed the Asserted Patents as alleged herein;
2. A judgment that Defendant's infringement of the Asserted Patents was deliberate and willful;
3. A judgment for an accounting of damages sustained by Plaintiff as a result of the acts of infringement by Defendant;

4. A judgment and order requiring Defendant to pay Plaintiff damages under 35 U.S.C. § 284, including up to treble damages as provided by 35 U.S.C. § 284, and any royalties determined to be appropriate;
5. A judgment and order requiring Defendant to pay Plaintiff pre-judgment and post-judgment interest on the damages awarded;
6. A judgment and order finding this to be an exceptional case and requiring Defendant to pay the costs of this action (including all disbursements) and attorneys' fees as provided by 35 U.S.C. § 285; and
7. Such other and further relief as the Court deems just and equitable.

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