IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

STELLAR, LLC Plaintiff, v. MOTOROLA SOLUTIONS, INC. and WATCHGUARD VIDEO, INC. Defendants.	**Civil Action No. 4:23-cv-750** **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Stellar, LLC ("Stellar" or "Plaintiff"), for its Complaint against Defendants Motorola Solutions, Inc. ("MSI") and Watchguard Video, Inc., ("Watchguard") (collectively "Defendants"), alleges the following:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq*.

THE PARTIES

2. Plaintiff Stellar is a limited liability company organized under the laws of the State of California with a place of business at 14 Morena, Irvine, CA 92612.

3. Upon information and belief, MSI is an entity organized under the laws of the Delaware with a place of business at 415 E Exchange Pkwy, Allen, TX 75002. Upon information and belief, MSI sells, offers to sell, and/or uses products and services throughout the United States, including in this judicial district, and introduces infringing products and services into the stream of commerce knowing that they would be sold and/or used in this judicial district and elsewhere in the United States.

PATENT OWNER
Ex 2001

4. Upon information and belief, Watchguard was acquired by MSI on July 11, 2019. *See* https://www.motorolasolutions.com/newsroom/press-releases/motorola-solutions-acquires-watchguard-inc-leader-in-mobile-video-for-publi.html (last visited July 26, 2023)

5. Upon information and belief, Watchguard is an entity organized under the laws of the Delaware with a place of business at 415 E Exchange Pkwy, Allen, TX 75002. Upon information and belief, Watchguard sells, offers to sell, and/or uses products and services throughout the United States, including in this judicial district, and introduces infringing products and services into the stream of commerce knowing that they would be sold and/or used in this judicial district and elsewhere in the United States.

JURISDICTION AND VENUE

6. This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 of the United States Code.

7. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

8. Venue is proper in this judicial district under 28 U.S.C. § 1400(b).

9. This Court has personal jurisdiction over Defendant under the laws of the State of Texas, due at least to their substantial business in Texas and in this judicial district, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in the State of Texas.

BACKGROUND

The Invention

10. Paul DeKeyser is the inventor of U.S. Patent No(s). 7,593,034 ("the '034 patent") 8,310,540 ("the '540 patent"), 8,692,882 ("the '882 patent"), 8,928,752 ("the '752 patent"),

9,485,471 ("the '471 patent"), 9,912,914 ("the '914 patent"), 10,523,901 ("the '901 patent"), and 10,965,910 ("the '910 patent") (collectively the "Asserted Patents"). True and correct copies of the Asserted Patents are attached as Exhibits A-1, B-1, C-1, D-1, E-1, F-1, G-1 and H-1 respectively.

11. The patents resulted from the pioneering efforts of Mr. DeKeyser (hereinafter "the Inventor") in the area of mobile and/or wearable video recording technology. These efforts resulted in the development of multiple methods and apparatuses for mobile, mounted and/or wearable recording systems with memory and write-protection technology. At the time of these pioneering efforts, the most widely implemented technology used to address saving video recordings required the recorded data to be manually saved or deleted when the device reached capacity. In that type of system, when the device reached capacity, no additional data could be recorded until the previously recorded data was transferred to an external medium or new/additional memory was added to the device. The Inventor conceived of the inventions claimed in the Asserted Patents as a way to improve recording and write-protection capabilities in mobile, mounted and/or wearable recording systems. The patents describe systems and methods for write-protecting previously recorded segments in a memory which can be subsequently transferred to an external storage media without interrupting any contemporaneous recording when the device reaches capacity. Additionally, the inventions of the Asserted Patents permit indexing of recorded segments.

12. For example, one of the innovative aspects of the Asserted Patents comprises a circular buffer which stores recorded sensor data until it is full, at which point the data is overwritten by new sensor data. Additional innovative aspects include a write-protection system

which allows the user to protect certain portions of the recorded data so that the protected portions are not overwritten when the device's memory is full.

Advantage Over the Prior Art

13. The patented inventions disclosed in the Asserted Patents provide many advantages over the prior art, and in particular improved the operations of saving and protecting recorded sensor data in a memory. (*See, e.g.,* Ex. A-1 at 2:44–67; Ex. E-1 at 2:12–27.) One example of an advantage of the patented inventions includes storing sensor data in a circular buffer on a local memory so that the circular buffer continuously stores sensor data, and, if no triggering event is detected, the previously recorded data is automatically overwritten by new data. (*See* Ex. B-1 at 3:66–4:7; Ex. F-1 at 5:66–6:15.)

14. Another innovative concept of the patented inventions includes the ability for a user to signal the recorder to protect a segment of sensor data, including time before the signal. This enables the recorder to capture an unforeseen event along with activity leading up to the event. In one of the preferred implementations, the recorder wirelessly sends protected segments of the circular buffer to a memory, which eliminates the need to manually transfer sensor data to create space for additional recordings. (*See* Ex. C-1 at 3:15–31; Ex. D-1 at 3:37–65.) Wireless offload of captured events has the further benefit of instantly informing interested parties at distant locations. Multiple segments of sensor data may be designated for write-protection, which allows the recorder to operate continuously and to capture a succession of events over an extended period of time.

15. Another example of an advantage of the patented inventions is the ability for a user to record data in a hands-free fashion. The devices can be mounted on the body, on eyewear, or almost any surface as needed. In addition, because of the contemplated size of the recording

device, secret recording is a potentially available as an option. (*See* Ex. C-1 at 3:8–14; Ex. G-1 3:20–26; Ex. H-1 11:19–27.)

16. Because of the significant advantages that can be achieved using the patented inventions, the inventions of the Asserted Patents present significant commercial value for companies like Defendant. Indeed, having a recording device that has numerous mounting possibilities, both hidden and otherwise, and that is hands-free is desirable for use in professional and personal settings. The ability for a user to continuously record, without having to stop to transfer segments of recorded data when the memory is full is a feature that greatly increases the convenience of the device as it can be left with minimal supervision and still continually record data without user intervention. Further, having the ability to signal the device to protect certain segments from overwriting makes this device even more commercially valuable, as it can ensure that the portion of sensor data the user desires remains protected for later review or use. In addition, wireless transfer is an important advantage. The user may upload to shared storage, potentially making segments visible to remote observers, for example to dispatch assistance when needed.

Technological Innovation

17. The patented inventions disclosed in the Asserted Patents resolve technical problems related to mobile, mounted and/or wearable video recording technology, particularly problems related to the utilization of write-protecting portions of the recorded data. As the Asserted Patents explain, one of the limitations of the prior art regarding video recording technology was the limitation of memory on the device itself. When the memory was full, a user would have to delete files or physically transfer the recorded data to an external medium to free up additional space or add additional storage capacity. This inconvenient limitation in then-existing devices

discouraged mobile recording. Most loop recording devices in existence at the time lacked the ability to write-protect portions of the recorded data and simply overwrote previously-recorded sensor data indiscriminately, forcing a user to physically transfer the recorded data of interest. (*See* Ex. B-1 at 1:32-2:9.)

18. The claims of the Asserted Patents do not merely recite the performance of some well-known business practice from the pre-Internet world along with the requirement to perform it on the Internet. Instead, the claims of the Asserted Patents recite inventive concepts that are deeply rooted in video recording technology and overcome problems specifically arising out of then-existing technology. Most of the then-existing technology did not make it possible for a user to continuously record and write-protect sensor data simultaneously without having to stop to physically make space on the device when the memory filled up by transferring previously-recorded data.

19. Moreover, the claims of the Asserted Patents recite inventive concepts that are not merely routine or conventional use of video recording or surveillance. Instead, the patented inventions disclosed in the Asserted Patents provide a new and novel solution to specific problems related to improving real-time sensor data recording. For example, in a preferred embodiment, the addition of a circular buffer and a write-protection system makes the sensor data recording device much more functional. When a trigger signal is detected by the device, a segment of sensor data is protected from overwriting until a certain amount of time has elapsed or second triggering is detected. This allows the device to be more efficient with its memory, as well as ensuring the write-protected recording includes context both immediately before and after the triggering event is detected. Then-existing devices in this technological area did not

implement this feature in the manner that the inventions do and were not as user-friendly or convenient for mobile applications.

20. And finally, the patented inventions disclosed in the Asserted Patents do not preempt all the ways for implementing mobile, mounted and/or wearable recording systems with memory and write-protection technology, nor do the Asserted Patents preempt any other well-known or prior art technology.

21. Accordingly, the claims of the Asserted Patents recite a combination of elements sufficient to ensure that the claim in substance and in practice amounts to significantly more than a patent-ineligible abstract idea.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,593,034

22. The allegations set forth in the foregoing paragraphs are incorporated into this First Claim for Relief.

23. On September 22, 2009, the ’034 patent was duly and legally issued by the United States Patent and Trademark Office under the title “Loop Recording With Book Marking”.

24. Plaintiff is the assignee and owner of the right, title and interest in and to the ’034 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

25. Upon information and belief, Defendant has and continues to directly infringe one or more claims of the ’034 patent by selling, offering to sell, and making products, specifically one or more WatchGuard In-Car Video Systems, which by way of example includes the WatchGuard 4RE In-Car Video System.[1] *See* Exhibit A-2; *See* https://www.motorolasolutions.com/en_us/video-security-access-control/in-car-video-

[1] Stellar believes and contends the following products possess the same characteristics and/or operate in the same or similar manner and therefore also infringe the ’034 patent: Vista, Vista XLT, V700, V300, VB400.

systems/4re-in-car-video-system.html (last visited June 07, 2023) (the "Accused Instrumentalities").

26. Exemplary infringement analysis showing infringement of at least claims 1, 7 and 12 of the '034 patent is set forth in Exhibit A-2. This infringement analysis is necessarily preliminary, as it is provided in advance of any discovery provided by Defendant with respect to the '034 patent. Plaintiff reserves all rights to amend, supplement and modify this preliminary infringement analysis. Nothing in the attached chart should be construed as any express or implied contention or admission regarding the construction of any term or phrase of the claims of the '034 patent.

27. The Accused Instrumentalities infringed and continue to infringe at least claims 1, 7 and 12 of the '034 patent during the pendency of the '034 patent.

28. On information and belief, MSI has had knowledge of the '034 patent since Stellar gave a business presentation to MSI on September 27, 2016. At this presentation, Stellar pitched its technology, including the inventions of the '034 patent in an effort to develop a strategic partnership between the two companies. Because MSI was made aware of the '034 patent at the 2016 presentation, and because of the email exchange between TrueNorth IP (Stellar's agent) and Rajan Naik of MSI on December 4, 2019, MSI knew or should have known that Watchguard infringed as of 2019.

29. Upon information and belief, since MSI had knowledge of the '034 patent, MSI has induced and continues to induce others to infringe at least claims 1, 7, and 12 of '034 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to MSI's partners and customers,

whose use of the Accused Instrumentalities constitutes direct infringement of at least claims 1, 7, and 12 of the ’034 patent.

30. In particular, MSI’s actions that aid and abet others such as their partners and customers to infringe include distributing the Accused Instrumentalities and providing materials and/or services related to the Accused Instrumentalities. On information and belief, MSI has engaged in such actions with specific intent to cause infringement or with willful blindness to the resulting infringement because the MSI has had actual knowledge of the ’034 patent and that its acts were inducing infringement of the ’034 patent since MSI has had knowledge of the ’034 patent.

31. In particular, MSI has a website for the Accused Instrumentalities with support materials. MSI also offers online training resources in the form of a “Learning Experience Portal.” *See* https://learning.motorolasolutions.com/ (last visited June 07, 2023). MSI was also a sponsor of the 2019 International Association of Chiefs of Police Annual Conference, a gathering of more than 15,000 public safety professionals, where MSI had three booths demonstrating technology. *See* https://www.motorolasolutions.com/en_us/about/events/iacp.html (last visited June 07, 2023). This technology included an expanded set of options in Video Security Solutions due to MSI’s WatchGuard acquisition. *Id.*

32. MSI also regularly presents to investors and the general public on its technology. *See* https://www.motorolasolutions.com/investors/events-and-presentations.html. For example, Executive Vice President and Chief Technology Officer Mahesh Saptharishi went on a podcast to discuss their "public safety device and application ecosystems,” which the Accused Instrumentalities are a part of. https://open.spotify.com/episode/4DgavYqzlPRSix00qJ7cKM (last visited June 07, 2023).

33. Upon information and belief, since MSI had knowledge of the ’034 patent, Defendant is liable as a contributory infringer of the ’034 patent under 35 U.S.C. § 271(c) by offering to sell, selling and importing into the United States in-car video systems to be especially made or adapted for use in an infringement of the ’034 patent. The Accused Instrumentalities are material components for use in practicing the ’034 patent and are specifically made and are not a staple article of commerce suitable for substantial non-infringing use.

34. On information and belief, since MSI had knowledge of the ’034 patent, MSI’s infringement has been and continues to be willful.

35. Plaintiff has been harmed by the Defendant’s infringing activities.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 8,310,540

36. The allegations set forth in the foregoing paragraphs are incorporated into this Second Claim for Relief.

37. On November 13, 2012, the ’540 patent was duly and legally issued by the United States Patent and Trademark Office under the title “Loop Recording With Book Marking”.

38. Plaintiff is the assignee and owner of the right, title and interest in and to the ’540 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

39. Defendant has and continues to directly infringe one or more claims of the ’540 patent by selling, offering to sell, and making products, specifically one or more WatchGuard In-Car Video Systems, which by way of example includes the WatchGuard 4RE In-Car Video System.[2] *See* Exhibit B-2; *See* https://www.motorolasolutions.com/en_us/video-security-access-control/in-

[2] Stellar believes and contends the following products possess the same characteristics and/or operate in the same or similar manner and therefore also infringe the ’540 patent: Vista, Vista XLT, V700, V300, VB400.

car-video-systems/4re-in-car-video-system.html (last visited June 07, 2023) (the "Accused Instrumentalities").

40. Exemplary infringement analysis showing infringement of at least claim 1of the '540 patent is set forth in Exhibit B-2. This infringement analysis is necessarily preliminary, as it is provided in advance of any discovery provided by Defendant with respect to the '540 patent. Plaintiff reserves all rights to amend, supplement and modify this preliminary infringement analysis. Nothing in the attached chart should be construed as any express or implied contention or admission regarding the construction of any term or phrase of the claims of the '540 patent.

41. The Accused Instrumentalities infringed and continue to infringe at least claim 1 of the '540 patent during the pendency of the '540 patent.

42. On information and belief, MSI has had knowledge of the '540 patent since Stellar gave a business presentation to MSI on September 27, 2016. At this presentation, Stellar pitched its technology, including the inventions of the '540 patent in an effort to develop a strategic partnership between the two companies. Because MSI was made aware of the '540 patent at the 2016 presentation, and because of the email exchange between TrueNorth IP (Stellar's agent) and Rajan Naik of MSI on December 4, 2019, MSI knew or should have known that Watchguard infringed as of 2019.

43. Upon information and belief, since MSI had knowledge of the '540 patent, MSI has induced and continues to induce others to infringe at least claim 1 of the '540 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to MSI's partners and customers, whose use of the Accused Instrumentalities constitutes direct infringement of at least claim 1 of the '540 patent.

44. In particular, MSI's actions that aid and abet others such as their partners and customers to infringe include distributing the Accused Instrumentalities and providing materials and/or services related to the Accused Instrumentalities. On information and belief, MSI has engaged in such actions with specific intent to cause infringement or with willful blindness to the resulting infringement because the MSI has had actual knowledge of the '540 patent and that its acts were inducing infringement of the '540 patent since MSI has had knowledge of the '540 patent.

45. In particular, MSI has a website for the Accused Instrumentalities with support materials. MSI also offers online training resources in the form of a "Learning Experience Portal." *See* https://learning.motorolasolutions.com/ (last visited June 07, 2023). MSI was also a sponsor of the 2019 International Association of Chiefs of Police Annual Conference, a gathering of more than 15,000 public safety professionals, where MSI had three booths demonstrating technology. *See* https://www.motorolasolutions.com/en_us/about/events/iacp.html (last visited June 07, 2023). This technology included an expanded set of options in Video Security Solutions due to MSI's WatchGuard acquisition. *Id.*

46. MSI also regularly presents to investors and the general public on its technology. *See* https://www.motorolasolutions.com/investors/events-and-presentations.html. For example, Executive Vice President and Chief Technology Officer Mahesh Saptharishi went on a podcast to discuss their "public safety device and application ecosystems," which the Accused Instrumentalities are a part of. https://open.spotify.com/episode/4DgavYqzlPRSix00qJ7cKM (last visited June 07, 2023).

47. Upon information and belief, since MSI had knowledge of the '034 patent, Defendant is liable as a contributory infringer of the '540 patent under 35 U.S.C. § 271(c) by offering to sell,

selling and importing into the United States in-car video systems to be especially made or adapted for use in an infringement of the ’540 patent. The Accused Instrumentalities are material components for use in practicing the ’540 patent and are specifically made and are not a staple article of commerce suitable for substantial non-infringing use.

48. On information and belief, since MSI had knowledge of the ’540 patent, MSI’s infringement has been and continues to be willful.

49. Plaintiff has been harmed by the Defendant’s infringing activities.

COUNT III – INFRINGEMENT OF U.S. PATENT NO. 8,692,882

50. The allegations set forth in the foregoing paragraphs are incorporated into this Third Claim for Relief.

51. On April 8, 2014, the ’882 patent was duly and legally issued by the United States Patent and Trademark Office under the title “Loop Recording With Book Marking”.

52. Plaintiff is the assignee and owner of the right, title and interest in and to the ’882 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

53. Defendant has and continues to directly infringe one or more claims of the ’882 patent by selling, offering to sell, and making products, specifically one or more WatchGuard In-Car Video Systems, which by way of example includes the WatchGuard 4RE In-Car Video System.[3] *See* Exhibit C-2; *See* https://www.motorolasolutions.com/en_us/video-security-access-control/in-car-video-systems/4re-in-car-video-system.html (last visited June 07, 2023).

54. Exemplary infringement analysis showing infringement of at least claims 12, 21 and 22 of the ’882 patent is set forth in Exhibit C-2. This infringement analysis is necessarily

[3] Stellar believes and contends the following products possess the same characteristics and/or operate in the same or similar manner and therefore also infringe the ’882 patent: Vista, Vista XLT, V700, V300, VB400,

preliminary, as it is provided in advance of any discovery provided by Defendant with respect to the ’882 patent. Plaintiff reserves all rights to amend, supplement and modify this preliminary infringement analysis. Nothing in the attached chart should be construed as any express or implied contention or admission regarding the construction of any term or phrase of the claims of the ’882 patent.

55. The Accused Instrumentalities infringed and continue to infringe at least claims 12, 21 and 22 of the ’882 patent during the pendency of the ’882 patent.

56. On information and belief, MSI has had knowledge of the ’882 patent since Stellar gave a business presentation to MSI on September 27, 2016. At this presentation, Stellar pitched its technology, including the inventions of the ’882 patent in an effort to develop a strategic partnership between the two companies. Because MSI was made aware of the ’882 patent at the 2016 presentation, and because of the email exchange between TrueNorth IP (Stellar’s agent) and Rajan Naik of MSI on December 4, 2019, MSI knew or should have known that Watchguard infringed as of 2019.

57. Upon information and belief, since MSI had knowledge of the ’882 patent, MSI has induced and continues to induce others to infringe at least claims 12, 21 and 22 of the ’882 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to MSI’s partners and customers, whose use of the Accused Instrumentalities constitutes direct infringement of at least claims 12, 21 and 22 of the ’882 patent.

58. In particular, MSI’s actions that aid and abet others such as their partners and customers to infringe include distributing the Accused Instrumentalities and providing materials and/or services related to the Accused Instrumentalities. On information and belief, MSI has

engaged in such actions with specific intent to cause infringement or with willful blindness to the resulting infringement because the MSI has had actual knowledge of the ’882 patent and that its acts were inducing infringement of the ’882 patent since MSI has had knowledge of the ’882 patent.

59. In particular, MSI has a website for the Accused Instrumentalities with support materials. MSI also offers online training resources in the form of a “Learning Experience Portal.” *See* https://learning.motorolasolutions.com/ (last visited June 07, 2023). MSI was also a sponsor of the 2019 International Association of Chiefs of Police Annual Conference, a gathering of more than 15,000 public safety professionals, where MSI had three booths demonstrating technology. *See* https://www.motorolasolutions.com/en_us/about/events/iacp.html. (last visited June 07, 2023) This technology included an expanded set of options in Video Security Solutions due to MSI’s WatchGuard acquisition. *Id.*

60. MSI also regularly presents to investors and the general public on its technology. *See* https://www.motorolasolutions.com/investors/events-and-presentations.html. For example, Executive Vice President and Chief Technology Officer Mahesh Saptharishi went on a podcast to discuss their "public safety device and application ecosystems,” which the Accused Instrumentalities are a part of. https://open.spotify.com/episode/4DgavYqzlPRSix00qJ7cKM (last visited June 07, 2023).

61. Upon information and belief, since MSI had knowledge of the ’882 patent, Defendant is liable as a contributory infringer of the ’882 patent under 35 U.S.C. § 271(c) by offering to sell, selling and importing into the United States in-car video systems to be especially made or adapted for use in an infringement of the ’882 patent. The Accused Instrumentalities are material

components for use in practicing the ’882 patent and are specifically made and are not a staple article of commerce suitable for substantial non-infringing use.

62. On information and belief, since MSI had knowledge of the ’882 patent, MSI’s infringement has been and continues to be willful.

63. Plaintiff has been harmed by the Defendant’s infringing activities.

COUNT IV – INFRINGEMENT OF U.S. PATENT NO. 8,928,752

64. The allegations set forth in the foregoing paragraphs are incorporated into this Fourth Claim for Relief.

65. On January 6, 2015 the ’752 patent was duly and legally issued by the United States Patent and Trademark Office under the title “Recording Device With Pre-Start Signal Storage Capability”.

66. Plaintiff is the assignee and owner of the right, title and interest in and to the ’752 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

67. Defendant has and continues to directly infringe one or more claims of the ’752 patent by selling, offering to sell, and making products, specifically one or more WatchGuard In-Car Video Systems, which by way of example includes the WatchGuard 4RE In-Car Video System.[4] *See* Exhibit D-2; *See* https://www.motorolasolutions.com/en_us/video-security-access-control/in-car-video-systems/4re-in-car-video-system.html (last visited June 07, 2023).

68. Exemplary infringement analysis showing infringement of at least claim 1 of the ’752 patent is set forth in Exhibit D-2. This infringement analysis is necessarily preliminary, as it is provided in advance of any discovery provided by Defendant with respect to the ’752 patent.

[4] Stellar believes and contends the following products possess the same characteristics and/or operate in the same or similar manner and therefore also infringe the ’752 patent: Vista, Vista XLT, V700, V300, VB400.

Plaintiff reserves all rights to amend, supplement and modify this preliminary infringement analysis. Nothing in the attached chart should be construed as any express or implied contention or admission regarding the construction of any term or phrase of the claims of the ’752 patent.

69. The Accused Instrumentalities infringed and continue to infringe at least claim 1 of the ’752 patent during the pendency of the ’752 patent.

70. On information and belief, MSI has had knowledge of the ’752 patent since Stellar gave a business presentation to MSI on September 27, 2016. At this presentation, Stellar pitched its technology, including the inventions of the ’752 patent in an effort to develop a strategic partnership between the two companies. Because MSI was made aware of the ’752 patent at the 2016 presentation, and because of the email exchange between TrueNorth IP (Stellar’s agent) and Rajan Naik of MSI on December 4, 2019, MSI knew or should have known that Watchguard infringed as of 2019.

71. Upon information and belief, since MSI had knowledge of the ’752 patent, MSI has induced and continues to induce others to infringe at least claim 1 of the ’752 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to MSI’s partners and customers, whose use of the Accused Instrumentalities constitutes direct infringement of at least claim 1 of the ’752 patent.

72. In particular, MSI’s actions that aid and abet others such as their partners and customers to infringe include distributing the Accused Instrumentalities and providing materials and/or services related to the Accused Instrumentalities. On information and belief, MSI has engaged in such actions with specific intent to cause infringement or with willful blindness to the resulting infringement because the MSI has had actual knowledge of the ’752 patent and that its

acts were inducing infringement of the ’752 patent since MSI has had knowledge of the ’752 patent.

73. In particular, MSI has a website for the Accused Instrumentalities with support materials. MSI also offers online training resources in the form of a “Learning Experience Portal.” *See* https://learning.motorolasolutions.com/ (last visited June 07, 2023). MSI was also a sponsor of the 2019 International Association of Chiefs of Police Annual Conference, a gathering of more than 15,000 public safety professionals, where MSI had three booths demonstrating technology. *See* https://www.motorolasolutions.com/en_us/about/events/iacp.html. (last visited June 07, 2023) This technology included an expanded set of options in Video Security Solutions due to MSI’s WatchGuard acquisition. *Id.*

74. MSI also regularly presents to investors and the general public on its technology. *See* https://www.motorolasolutions.com/investors/events-and-presentations.html. For example, Executive Vice President and Chief Technology Officer Mahesh Saptharishi went on a podcast to discuss their "public safety device and application ecosystems,” which the Accused Instrumentalities are a part of. https://open.spotify.com/episode/4DgavYqzlPRSix00qJ7cKM (last visited June 07, 2023).

75. Upon information and belief, since MSI had knowledge of the ’752 patent, Defendant is liable as a contributory infringer of the ’752 patent under 35 U.S.C. § 271(c) by offering to sell, selling and importing into the United States in-car video systems to be especially made or adapted for use in an infringement of the ’752 patent. The Accused Instrumentalities are material components for use in practicing the ’752 patent and are specifically made and are not a staple article of commerce suitable for substantial non-infringing use.

76. On information and belief, since MSI had knowledge of the ’752 patent, MSI’s infringement has been and continues to be willful.

77. Plaintiff has been harmed by the Defendant’s infringing activities.

COUNT V – INFRINGEMENT OF U.S. PATENT NO. 9,485,471

78. The allegations set forth in the foregoing paragraphs are incorporated into this Fifth Claim for Relief.

79. On November 1, 2016, the ’471 patent was duly and legally issued by the United States Patent and Trademark Office under the title “Write Protected Recording”.

80. Plaintiff is the assignee and owner of the right, title and interest in and to the ’471 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

81. Defendant has and continues to directly infringe one or more claims of the ’471 patent by selling, offering to sell, and making products, specifically one or more WatchGuard cameras, which by way of example includes the WatchGuard VISTA Body cameras.[5] *See* Exhibit E-2; *See* https://www.motorolasolutions.com/en_us/video-security-access-control/body-worn-cameras/vista-wifi.html (last visited June 07, 2023)

82. Exemplary infringement analysis showing infringement of at least claims 1–3 of the ’471 patent is set forth in Exhibit E-2. This infringement analysis is necessarily preliminary, as it is provided in advance of any discovery provided by Defendant with respect to the ’471 patent. Plaintiff reserves all rights to amend, supplement and modify this preliminary infringement analysis. Nothing in the attached chart should be construed as any express or implied contention or admission regarding the construction of any term or phrase of the claims of the ’471 patent.

[5] Stellar believes and contends the following products possess the same characteristics and/or operate in the same or similar manner and therefore also infringe the ’471 patent: Vista, Vista XLT, V700, V300, VB400.

83. The Accused Instrumentalities infringed and continue to infringe at least claims 1–3 of the ’471 patent during the pendency of the ’471 patent.

84. On information and belief, Defendants have had knowledge of the ’471 patent at least since the email exchange between TrueNorth IP (Stellar’s agent) and Rajan Naik of MSI on December 4, 2019. Because of this MSI knew or should have known that Watchguard infringed as of 2019.

85. Upon information and belief, since MSI had knowledge of the ’471 patent, MSI has induced and continues to induce others to infringe at least claims 1–3 of the ’471 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to MSI’s partners and customers, whose use of the Accused Instrumentalities constitutes direct infringement of at least claims 1–3 of the ’471 patent.

86. In particular, MSI’s actions that aid and abet others such as their partners and customers to infringe include distributing the Accused Instrumentalities and providing materials and/or services related to the Accused Instrumentalities. On information and belief, MSI has engaged in such actions with specific intent to cause infringement or with willful blindness to the resulting infringement because MSI has had actual knowledge of the ’471 patent and that its acts were inducing infringement of the ’471 patent since MSI has had knowledge of the ’471 patent.

87. In particular, MSI has a website for the Accused Instrumentalities with support materials. MSI also offers online training resources in the form of a “Learning Experience Portal.” *See* https://learning.motorolasolutions.com/ (last visited June 07, 2023). MSI was also a sponsor of the 2019 International Association of Chiefs of Police Annual Conference, a gathering of more than 15,000 public safety professionals, where MSI had three booths demonstrating technology.

See https://www.motorolasolutions.com/en_us/about/events/iacp.html (last visited June 07, 2023). This technology included an expanded set of options in Video Security Solutions due to MSI's WatchGuard acquisition. *Id.*

88. MSI also regularly presents to investors and the general public on its technology. *See* https://www.motorolasolutions.com/investors/events-and-presentations.html. For example, Executive Vice President and Chief Technology Officer Mahesh Saptharishi went on a podcast to discuss their "public safety device and application ecosystems," which the Accused Instrumentalities are a part of. https://open.spotify.com/episode/4DgavYqzlPRSix00qJ7cKM (last visited June 07, 2023).

89. Upon information and belief, since MSI had knowledge of the '471 patent, Defendant is liable as a contributory infringer of the '471 patent under 35 U.S.C. § 271(c) by offering to sell, selling and importing into the United States in-car and other video systems to be especially made or adapted for use in an infringement of the '471 patent. The Accused Instrumentalities are material components for use in practicing the '471 patent and are specifically made and are not a staple article of commerce suitable for substantial non-infringing use.

90. On information and belief, since MSI had knowledge of the '471 patent at least since the filing of the Complaint, MSI's infringement has been and continues to be willful.

91. Plaintiff has been harmed by the Defendant's infringing activities.

COUNT VI – INFRINGEMENT OF U.S. PATENT NO. 9,912,914

92. The allegations set forth in the foregoing paragraphs are incorporated into this Sixth Claim for Relief.

93. On March 6, 2018, the '914 patent was duly and legally issued by the United States Patent and Trademark Office under the title "Write-Protected Recording".

94. Plaintiff is the assignee and owner of the right, title and interest in and to the '914 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

95. Defendant has and continues to directly infringe one or more claims of the '914 patent by selling, offering to sell, and making products, specifically one or more WatchGuard In-Car Video Systems, which by way of example includes the WatchGuard 4RE In-Car Video System.[6] *See* Exhibit F-2; *See* https://www.motorolasolutions.com/en_us/video-security-access-control/in-car-video-systems/4re-in-car-video-system.html (last visited June 07, 2023).

96. Exemplary infringement analysis showing infringement of at least claim 1 of the '914 patent is set forth in Exhibit F-2. This infringement analysis is necessarily preliminary, as it is provided in advance of any discovery provided by Defendant with respect to the '914 patent. Plaintiff reserves all rights to amend, supplement and modify this preliminary infringement analysis. Nothing in the attached chart should be construed as any express or implied contention or admission regarding the construction of any term or phrase of the claims of the '914 patent.

97. The Accused Instrumentality infringed and continue to infringe at least claim 1 of the '914 patent during the pendency of the '914 patent.

98. On information and belief, Defendants have had knowledge of the '914 patent at least since the email exchange between TrueNorth IP (Stellar's agent) and Rajan Naik of MSI on December 4, 2019. Because of this, MSI knew or should have known that Watchguard infringed as of 2019.

99. Upon information and belief, since MSI had knowledge of the '914 patent, MSI has induced and continues to induce others to infringe at least claim 1 of the '914 patent under 35

[6] Stellar believes and contends the following products possess the same characteristics and/or operate in the same or similar manner and therefore also infringe the '914 patent: Vista, Vista XLT, V700, V300, VB400.

U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to MSI's partners and customers, whose use of the Accused Instrumentalities constitutes direct infringement of at least claim 1 of the '914 patent.

100. In particular, MSI's actions that aid and abet others such as their partners and customers to infringe include distributing the Accused Instrumentalities and providing materials and/or services related to the Accused Instrumentalities. On information and belief, MSI has engaged in such actions with specific intent to cause infringement or with willful blindness to the resulting infringement because MSI has had actual knowledge of the '914 patent and that its acts were inducing infringement of the '914 patent since MSI has had knowledge of the '914 patent.

101. In particular, MSI has a website for the Accused Instrumentalities with support materials. MSI also offers online training resources in the form of a "Learning Experience Portal." *See* https://learning.motorolasolutions.com/ (last visited June 07, 2023). MSI was also a sponsor of the 2019 International Association of Chiefs of Police Annual Conference, a gathering of more than 15,000 public safety professionals, where MSI had three booths demonstrating technology. *See* https://www.motorolasolutions.com/en_us/about/events/iacp.html (last visited June 07, 2023). This technology included an expanded set of options in Video Security Solutions due to MSI's WatchGuard acquisition. *Id.*

102. MSI also regularly presents to investors and the general public on its technology. *See* https://www.motorolasolutions.com/investors/events-and-presentations.html. For example, Executive Vice President and Chief Technology Officer Mahesh Saptharishi went on a podcast to discuss their "public safety device and application ecosystems," which the Accused

Instrumentalities are a part of. https://open.spotify.com/episode/4DgavYqzlPRSix00qJ7cKM (last visited June 07, 2023).

103. Upon information and belief, since MSI had knowledge of the '914 patent, Defendant is liable as a contributory infringer of the '914 patent under 35 U.S.C. § 271(c) by offering to sell, selling and importing into the United States in-car and other video systems to be especially made or adapted for use in an infringement of the '914 patent. The Accused Instrumentalities are material components for use in practicing the '914 patent and are specifically made and are not a staple article of commerce suitable for substantial non-infringing use.

104. On information and belief, since MSI had knowledge of the '914 patent at least since the filing of the Complaint, MSI's infringement has been and continues to be willful.

105. Plaintiff has been harmed by the Defendant's infringing activities.

COUNT VII – INFRINGEMENT OF U.S. PATENT NO. 10,523,901

106. The allegations set forth in the foregoing paragraphs are incorporated into this Seventh Claim for Relief.

107. On December 31, 2019, the '901 patent was duly and legally issued by the United States Patent and Trademark Office under the title "Wearable Recording System With Memory Designation".

108. Plaintiff is the assignee and owner of the right, title and interest in and to the '901 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

109. Upon information and belief, Defendant has and continues to directly infringe one or more claims of the '901 patent by selling, offering to sell, and making products, specifically one or more specifically one or more WatchGuard In-Car Video Systems, which by way of example includes the WatchGuard Vista XLT. *See* Exhibit G-2; *See*

https://www.motorolasolutions.com/en_us/video-security-access-control/in-car-video-systems/4re-in-car-video-system.html (last visited June 07, 2023).

110. Defendant's partners, customers, and end-users have and continue to directly infringe one or more claims of the '901 patent by using products, specifically one or more WatchGuard In-Car Video Systems, which by way of example includes the WatchGuard Vista XLT. *See* Exhibit G-2; *See* https://www.motorolasolutions.com/en_us/video-security-access-control/in-car-video-systems/4re-in-car-video-system.html (last visited June 07, 2023).

111. Exemplary infringement analysis showing infringement of at least claim 1 of the '901 patent is set forth in Exhibit G-2. This infringement analysis is necessarily preliminary, as it is provided in advance of any discovery provided by Defendant with respect to the '901 patent. Plaintiff reserves all rights to amend, supplement and modify this preliminary infringement analysis. Nothing in the attached chart should be construed as any express or implied contention or admission regarding the construction of any term or phrase of the claims of the '901 patent.

112. The Accused Instrumentality infringed and continues to infringe at least claim 1 of the '901 patent during the pendency of the '901 patent.

113. On information and belief, Defendants have had knowledge of the '914 patent at least since the email exchange between TrueNorth IP (Stellar's agent) and Rajan Naik of MSI on December 4, 2019. Because of this, MSI knew or should have known that Watchguard infringed as of 2019.

114. Upon information and belief, since MSI had knowledge of the '901 patent, MSI has induced and continues to induce others to infringe at least claim 1 of the '901 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to MSI's partners and customers,

whose use of the Accused Instrumentalities constitutes direct infringement of at least claim 1 of the ’901 patent.

115. In particular, MSI’s actions that aid and abet others such as their partners and customers to infringe include distributing the Accused Instrumentalities and providing materials and/or services related to the Accused Instrumentalities. On information and belief, MSI has engaged in such actions with specific intent to cause infringement or with willful blindness to the resulting infringement because MSI has had actual knowledge of the ’901 patent and that its acts were inducing infringement of the ’901 patent since MSI has had knowledge of the ’901 patent.

116. In particular, MSI has a website for the Accused Instrumentalities with support materials. MSI also offers online training resources in the form of a “Learning Experience Portal.” *See* https://learning.motorolasolutions.com/ (last visited June 07, 2023). MSI was also a sponsor of the 2019 International Association of Chiefs of Police Annual Conference, a gathering of more than 15,000 public safety professionals, where MSI had three booths demonstrating technology. *See* https://www.motorolasolutions.com/en_us/about/events/iacp.html (last visited June 07, 2023). This technology included an expanded set of options in Video Security Solutions due to MSI’s WatchGuard acquisition. *Id.*

117. MSI also regularly presents to investors and the general public on its technology. *See* https://www.motorolasolutions.com/investors/events-and-presentations.html. For example, Executive Vice President and Chief Technology Officer Mahesh Saptharishi went on a podcast to discuss their "public safety device and application ecosystems,” which the Accused Instrumentalities are a part of. https://open.spotify.com/episode/4DgavYqzlPRSix00qJ7cKM (last visited June 07, 2023).

118. Upon information and belief, since MSI had knowledge of the ’901 patent, Defendant is liable as a contributory infringer of the ’901 patent under 35 U.S.C. § 271(c) by offering to sell, selling and importing into the United States in-car and other video systems to be especially made or adapted for use in an infringement of the ’901 patent. The Accused Instrumentalities are material components for use in practicing the ’901 patent and are specifically made and are not a staple article of commerce suitable for substantial non-infringing use.

119. On information and belief, since MSI had knowledge of the ’901 patent at least since the filing of the Complaint, MSI’s infringement has been and continues to be willful.

120. Plaintiff has been harmed by the Defendant’s infringing activities.

COUNT VIII – INFRINGEMENT OF U.S. PATENT NO. 10,965,910

121. The allegations set forth in the foregoing paragraphs are incorporated into this Seventh Claim for Relief.

122. On March 30, 2021, the ’910 patent was duly and legally issued by the United States Patent and Trademark Office under the title “Wearable Recording System With Memory Designation”.

123. Plaintiff is the assignee and owner of the right, title and interest in and to the ’910 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

124. Defendant has and continues to directly infringe one or more claims of the ’910 patent by selling, offering to sell, and making products, specifically one or more WatchGuard In-Car Video Systems, which by way of example includes the WatchGuard 4RE In-Car Video

System.[7] *See* Exhibit H-2; *See* https://www.motorolasolutions.com/en_us/video-security-access-control/in-car-video-systems/4re-in-car-video-system.html (last visited June 07, 2023).

125. Exemplary infringement analysis showing infringement of at least claim 1 of the ’910 patent is set forth in Exhibit H-2. This infringement analysis is necessarily preliminary, as it is provided in advance of any discovery provided by Defendant with respect to the ’910 patent. Plaintiff reserves all rights to amend, supplement and modify this preliminary infringement analysis. Nothing in the attached chart should be construed as any express or implied contention or admission regarding the construction of any term or phrase of the claims of the ’910 patent.

126. The Accused Instrumentality infringed and continues to infringe at least claim 1 of the ’910 patent during the pendency of the ’910 patent.

127. Upon information and belief, since MSI had knowledge of the ’910 patent[8], MSI has induced and continues to induce others to infringe at least claim 1 of the ’910 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to MSI’s partners and customers, whose use of the Accused Instrumentalities constitutes direct infringement of at least claim 1 of the ’910 patent.

128. In particular, MSI’s actions that aid and abet others such as their partners and customers to infringe include distributing the Accused Instrumentalities and providing materials and/or services related to the Accused Instrumentalities. On information and belief, MSI has engaged in such actions with specific intent to cause infringement or with willful blindness to the

[7] Stellar believes and contends the following products possess the same characteristics and/or operate in the same or similar manner and therefore also infringe the ’910 patent: Vista, Vista XLT, V700, V300, VB400.
[8] MSI was aware of the patent family, as set forth in paragraphs 42, 56, 70, 84, 98, and 113 above.

PATENT OWNER
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resulting infringement because MSI has had actual knowledge of the ’910 patent and that its acts were inducing infringement of the ’910 patent since MSI has had knowledge of the ’910 patent.

129. In particular, MSI has a website for the Accused Instrumentalities with support materials. MSI also offers online training resources in the form of a “Learning Experience Portal.” *See* https://learning.motorolasolutions.com/ (last visited June 07, 2023). MSI was also a sponsor of the 2019 International Association of Chiefs of Police Annual Conference, a gathering of more than 15,000 public safety professionals, where MSI had three booths demonstrating technology. *See* https://www.motorolasolutions.com/en_us/about/events/iacp.html (last visited June 07, 2023). This technology included an expanded set of options in Video Security Solutions due to MSI’s WatchGuard acquisition. *Id.*

130. MSI also regularly presents to investors and the general public on its technology. *See* https://www.motorolasolutions.com/investors/events-and-presentations.html. For example, Executive Vice President and Chief Technology Officer Mahesh Saptharishi went on a podcast to discuss their "public safety device and application ecosystems,” which the Accused Instrumentalities are a part of. https://open.spotify.com/episode/4DgavYqzlPRSix00qJ7cKM (last visited June 07, 2023).

131. Upon information and belief, since MSI had knowledge of the ’910 patent, Defendant is liable as a contributory infringer of the ’910 patent under 35 U.S.C. § 271(c) by offering to sell, selling and importing into the United States in-car and other video systems to be especially made or adapted for use in an infringement of the ’910 patent. The Accused Instrumentalities are material components for use in practicing the ’910 patent and are specifically made and are not a staple article of commerce suitable for substantial non-infringing use.

132. On information and belief, since MSI had knowledge of the ’910 patent at least since the filing of the Complaint, MSI’s infringement has been and continues to be willful. Plaintiff has been harmed by the Defendant’s infringing activities.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment for itself and against Defendant as follows:

A. An adjudication that the Defendant has infringed the ’034 patent, the ’554 patent, the ’882 patent, the ’752 patent, the ’471 patent, the ’914 patent, the ’901 patent and the ’910 patent;

B. An award of damages to be paid by Defendant adequate to compensate Plaintiff for Defendant’s past infringement of the ’034 patent, the ’554 patent, the ’882 patent, the ’752 patent, the ’471 patent, the ’914 patent, the ’901 patent, and the ’910 patent, and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Plaintiff’s reasonable attorneys’ fees; and

D. An award to Plaintiff of such further relief at law or in equity as the Court deems just and proper.

Dated: August 21, 2023

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