

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**ONASSET INTELLIGENCE, INC.,**

*Plaintiff,*

**v.**

**7PSOLUTIONS, LLC**

*Defendant.*

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**CIVIL ACTION NO. 3:12-cv-\_\_\_\_\_**

**JURY TRIAL DEMANDED**

**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff OnAsset Intelligence, Inc. (“OnAsset”) hereby files its complaint for patent infringement against Defendant 7PSolutions, LLC (“7PSolutions”).

**PARTIES**

1. Plaintiff OnAsset is a Texas corporation with its headquarters and principal place of business at 3080 Story Road West, Irving, Texas 75038-3529.

2. Defendant 7PSolutions is an Indiana corporation with its corporate headquarters and principal place of business at 10 South Tocovi Court, Brownsburg, IN 46112. 7PSolutions may be served through its President and Registered Agent Jeff Clark 10 South Tocovi Court, Brownsburg, IN 46112.

**JURISDICTION AND VENUE**

3. This action arises under the Patent Act of 1952, 35 U.S.C. § 101 *et seq.* This Court has original and exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. §§ 1331 and 1338(a) and (b).

4. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c) and 1400(b), because, on information and belief, Defendant has transacted business in this district and, on information and belief, have committed acts of patent infringement in this district.

**COUNT 1: INFRINGEMENT OF U.S. PATENT NO. 7,791,455**

5. OnAsset is the owner by assignment of United States Patent No. 7,791,455 (“the ’455 Patent”), entitled “Method and Apparatus for Autonomous Detection of a Given Location or Situation.” A true and correct copy of the ’455 Patent is attached as Exhibit A. The ’455 Patent was duly and legally issued on September 7, 2010.

6. Defendant has been and now is directly and indirectly infringing the ’455 Patent in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, manufacturing, selling, and offering to sell air cargo tracking systems and devices covered by one or more claims of the ’455 Patent to the injury of OnAsset.

7. Defendant manufactures air cargo tracking systems and devices referred to as the “GL-200,” “GL-Tracker,” and/or “EMM Probe,” which infringes one or more claims of the ’455 Patent.

8. Defendant has induced and induces its customers and end users to infringe one or more claims of the ’455 Patent and has had knowledge of the ’455 Patent and the infringement at least as of the date of the filing of this lawsuit.

9. On information and belief, Defendant is aware of the ’455 Patent prior to any infringing acts.

10. As a result of Defendant’s infringement of the ’455 Patent, OnAsset has suffered monetary damages in an amount not yet determined and will continue to suffer damages in the future unless Defendant’s infringing activities are enjoined by this Court.

11. Defendants' infringement of the '455 Patent is causing OnAsset irreparable harm that cannot be adequately compensated by a damage award. Unless Defendants are enjoined from infringing the '455 Patent, OnAsset will be greatly and irreparably harmed.

**COUNT 2: INFRINGEMENT OF U.S. PATENT NO. 7,652,576**

12. OnAsset is the owner by assignment of United States Patent No. 7,652,576 ("the '576 Patent"), entitled "Method and Apparatus for Locating And/Or Otherwise Monitoring an ID Tagged Asset's Condition." A true and correct copy of the '576 Patent is attached as Exhibit B. The '576 Patent was duly and legally issued on January 26, 2010.

13. Defendant has been and now is directly and indirectly infringing the '576 Patent in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, manufacturing, selling, and offering to sell real-time tracking and monitoring systems covered by one or more claims of the '576 Patent to the injury of OnAsset.

14. Defendant markets, sells and offers for sale air cargo tracking systems and devices referred to as "RouteWatch" and "Transportation Environment Monitoring System (TEMS)," which infringes one or more claims of the '576 Patent.

15. Defendant has induced and induces its customers and end users to infringe one or more claims of the '576 Patent and has had knowledge of the '576 Patent and the infringement at least as of the date of the filing of this lawsuit.

16. On information and belief, Defendant was aware of the '576 Patent prior to any infringing acts.

17. As a result of Defendant's infringement of the '576 Patent, OnAsset has suffered monetary damages in an amount not yet determined and will continue to suffer damages in the future unless Defendant's infringing activities are enjoined by this Court.

18. Defendants' infringement of the '576 Patent is causing OnAsset irreparable harm that cannot be adequately compensated by a damage award. Unless Defendants are enjoined from infringing the '576 Patent, OnAsset will be greatly and irreparably harmed.

### **JURY DEMAND**

OnAsset demands a trial by jury on all issues so triable.

### **PRAYER FOR RELIEF**

OnAsset requests that the Court enter:

A. A preliminary and permanent injunction against Defendant enjoining it, its officers, directors, agents, servants, employees, investors, affiliates, divisions, branches, subsidiaries, parents and all others acting in active concert or in participation with them from infringement, inducement to infringe, or contributory infringement of the '455 and '576 Patents, including the manufacture, sale, offer for sale, distribution, or promotion of products falling within the scope of the '455 and '576 Patents;

B. A judgment in favor of OnAsset that Defendant has infringed, directly or indirectly, the '455 and '576 Patents;

C. A judgment ordering Defendant to pay OnAsset damages adequate to fully compensate OnAsset for Defendant's infringement of the '455 and '576 Patents, together with pre- and post-judgment interest and costs as fixed by the Court under 35 U.S.C. § 284;

D. A judgment in favor of OnAsset that Defendant has willfully infringed the '455 and '576 Patents;

E. A judgment ordering Defendant to pay OnAsset enhanced damages up to three times the amount of actual damages found or assessed as appropriate under 35 U.S.C. § 284;

- F. A judgment and order that this is an “exceptional” case under 35 U.S.C. § 285 and awarding OnAsset its reasonable attorneys’ fees;
- G. A judgment ordering the Defendant to pay OnAsset’s costs;
- H. A judgment awarding OnAsset both re- and post-judgment interest on all sums for which judgment is granted; and
- I. Any and all other and further relief as this Court deems just and proper.

Dated: September 12, 2012

**BUETHER JOE & CARPENTER, LLC**

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