1 2 3 4 5 6 7 8	Bruce G. Chapman (State Bar No. 164,258) bchapman@cblh.com Minda R. Schechter (State Bar No. 65,889) mschechter@cblh.com Manuel C. Nelson (State Bar No. 229,590) mnelson@cblh.com CONNOLLY BOVE LODGE & HUTZ LLP 355 S. Grand Ave., Suite 3150 Los Angeles, CA 90071 Tel: (213) 787-2500 Fax: (213) 687-0498		
9	Attorneys for Plaintiff,		
10	ENOVSYS LLC		
11			
12	IN THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA		
13	FOR THE CENTRAL DIST	RICI OF CALIFORNIA	
14	EMONGNOTIC CITC : 1: 1: 1	Civil Action No.	
15	ENOVSYS LLC, a California limited liability company,	Civil Action No.	
16	Plaintiff,	COMPLAINT FOR PATENT INFRINGEMENT	
17	v.		
18	NEXTEL COMMUNICATIONS, INC.,	Demand for Jury Trial Pursuant to Fed. R. Civ. P. 38(b)	
19	a Delaware corporation,		
20	Defendant.		
21			
22	For its Complaint, Enovsys LLC alleges:		
23	The Parties		
24	1. Plaintiff Enovsys LLC (hereinafter "Enovsys") is a California		
25	1. I familia Eliovojo Eleo (noromario: Eliovojo) is a Camforma		
26	limited liability company having a place of business at 269 South Beverly Drive,		
27	Suite 951, Los Angeles, CA 90212.		
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	Complaint Against Nextel		

1	2. Defendant Nextel Communications, Inc. (hereinafter "Nextel") is a	
2	Delaware corporation having a place of business at Edmund Halley Drive,	
3	Reston, VA 20191.	
4		
5	3. On information and belief, defendant Nextel sells location-enabled	
6	devices and location-based services for use on its iDEN network that include	
7 8	privacy features that allow location information to be selectively denied.	
9	Jurisdiction and Venue	
10	4. This is an action for patent infringement arising under Title 35 of	
11	This is an action for patent infingement arising ander free 35 of	
12	the United States Code as hereinafter more fully appears. This Court has	
13	20 XX G G 88 4004 14000	
14	5. Defendant Nextel has business operations in Los Angeles County,	
15 16	California in this judicial district, has consented to personal jurisdiction in this	
17	judicial district, and has induced and contributed to acts of patent infringement	
18	in this judicial district. Venue is proper under 28 U.S.C. §§ 1391 and 1400.	
19	in this justice. The is proper that I see that I see	
20	First Cause of Action	
21	6. On June 29, 1999, United States Patent No. 5,918,159 (hereinafter	
22	"the '159 patent"), attached hereto as Exhibit A, was duly and legally issued.	
23		
24	Plaintiff Enovsys owns the '159 patent and the right to collect for past damages	
25	from infringement thereon.	
26	7. On information and belief, defendant Nextel has been and is liable	
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28	for infringement of the '159 patent by inducing and contributing to such	

2 Complaint Against Nextel

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infringement by selling Nextel's location-enabled devices and location-based services, and defendant Nextel will continue to cause such infringement unless enjoined by this court.

8. Plaintiff Enovsys provided written notice of the '159 patent, and on information and belief, infringement of the '159 patent by defendant Nextel is willful.

Second Cause of Action

- 9. On May 6, 2003, United States Patent No. 6,560,461 (hereinafter "the '461 patent"), attached hereto as Exhibit B, was duly and legally issued. Plaintiff Enovsys owns the '461 patent and the right to collect for past damages from infringement thereon.
- 10. On information and belief, defendant Nextel has been and is liable for infringement of the '461 patent by inducing and contributing to such infringement by selling Nextel's location-enabled devices and location-based services, and defendant Nextel will continue to cause such infringement unless enjoined.
- 11. Plaintiff Enovsys provided written notice of the '461 patent and, on information and belief, infringement of the '461 patent by defendant Nextel is willful.

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Complaint Against Nextel

Prayer for Relief 1 2 WHEREFORE, plaintiff Enovsys respectfully demands: 3 that defendant Nextel account for and pay to Enovsys damages a. 4 sustained by Enovsys as a result of Nextel's infringement of the '159 and '461 5 6 patents; 7 that damages be increased as provided for by 35 U.S.C. § 284; b. 8 that defendant Nextel be enjoined from further infringing the '159 c. 9 10 and '461 patents as provided for by 35 U.S.C. § 283; 11 d. that Enovsys be awarded attorney's fees as provided for by 35 12 U.S.C. § 285; and 13 14 that Enovsys have such other and further relief as is just and proper. e. 15 Respectfully Submitted, 16 Connolly Bove Lodge & Hutz LLP 17 Bruce G. Chapman 18 Minda R. Schechter Manuel C. Nelson 19 20 Dated: 21 Bruce G. Chapman 22 Attorneys for Plaintiff, 23 **ENOVSYS LLC** 24 25 26 27 28

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2	Demand for Jury Trial	
3	Pursuant to Fed. R. Civ. P. 38(b) and Local Rule 38-1, plaintiff Enovsys	
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5	LLC hereby demands a trial by jury on all issues so triable.	
6	Respectfully Submitted,	
7	Connolly Bove Lodge & Hutz LLP	
8	Bruce G. Chapman	
9	Minda R. Schechter Manuel C. Nelson	
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11 12	Dated:	
13	Bruce G. Chapman	
14	Attorneys for Plaintiff	
15	ENOVSYS LLC	
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