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12 Attorneys for Plaintiff,
13 ENOVSYs LLC

14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

16 ENOVSYs LLC, a California limited
17 liability company,

18 Plaintiff,

19 v.

20 NEXTEL COMMUNICATIONS, INC.,
21 a Delaware corporation,

22 Defendant.

Civil Action No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

**Demand for Jury Trial Pursuant to
Fed. R. Civ. P. 38(b)**

23 For its Complaint, Enovsys LLC alleges:

24 The Parties

25 1. Plaintiff Enovsys LLC (hereinafter “Enovsys”) is a California
26 limited liability company having a place of business at 269 South Beverly Drive,
27 Suite 951, Los Angeles, CA 90212.
28

1 infringement by selling Nextel's location-enabled devices and location-based
2 services, and defendant Nextel will continue to cause such infringement unless
3 enjoined by this court.
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5 8. Plaintiff Enovsys provided written notice of the '159 patent, and on
6 information and belief, infringement of the '159 patent by defendant Nextel is
7 willful.
8

9 Second Cause of Action

10 9. On May 6, 2003, United States Patent No. 6,560,461 (hereinafter
11 "the '461 patent"), attached hereto as Exhibit B, was duly and legally issued.
12 Plaintiff Enovsys owns the '461 patent and the right to collect for past damages
13 from infringement thereon.
14

15 10. On information and belief, defendant Nextel has been and is liable
16 for infringement of the '461 patent by inducing and contributing to such
17 infringement by selling Nextel's location-enabled devices and location-based
18 services, and defendant Nextel will continue to cause such infringement unless
19 enjoined.
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21

22 11. Plaintiff Enovsys provided written notice of the '461 patent and, on
23 information and belief, infringement of the '461 patent by defendant Nextel is
24 willful.
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Prayer for Relief

WHEREFORE, plaintiff Enovsys respectfully demands:

- a. that defendant Nextel account for and pay to Enovsys damages sustained by Enovsys as a result of Nextel's infringement of the '159 and '461 patents;
- b. that damages be increased as provided for by 35 U.S.C. § 284;
- c. that defendant Nextel be enjoined from further infringing the '159 and '461 patents as provided for by 35 U.S.C. § 283;
- d. that Enovsys be awarded attorney's fees as provided for by 35 U.S.C. § 285; and
- e. that Enovsys have such other and further relief as is just and proper.

Respectfully Submitted,

Connolly Bove Lodge & Hutz LLP
Bruce G. Chapman
Minda R. Schechter
Manuel C. Nelson

Dated: _____

Bruce G. Chapman

Attorneys for Plaintiff,
ENOVSYS LLC

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Demand for Jury Trial

Pursuant to Fed. R. Civ. P. 38(b) and Local Rule 38-1, plaintiff Enovsys

LLC hereby demands a trial by jury on all issues so triable.

Respectfully Submitted,

Connolly Bove Lodge & Hutz LLP
Bruce G. Chapman
Minda R. Schechter
Manuel C. Nelson

Dated: _____

Bruce G. Chapman

Attorneys for Plaintiff
ENOVSYS LLC