IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PROXIMITY MONITORING INNOVATIONS LLC Plaintiff, -against- ASSETWORKS, INC. Defendant.	Civil Action No.:_____ **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRIGEMENT

Plaintiff Proximity Monitoring Innovations LLC ("PMI"), as and for its Complaint against Defendant AssetWorks, Inc. ("AssetWorks"), hereby alleges as follows:

NATURE OF THE ACTION

1. This is an action under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq*., for infringement by AssetWorks of claims of U.S. Patent No. 6,958,701.

PARTIES

2. Plaintiff PMI is a limited liability company organized and existing under the laws of the State of Delaware, with a principal place of business at One Commerce Center – 1201 Orange St., #600, Wilmington, Delaware 19899.

3. Upon information and belief, defendant AssetWorks is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 998 Old Eagle School Road, Suite 1215, Wayne, Pennsylvania 19087.

JURISDICTION AND VENUE

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

5. This Court has personal jurisdiction over Defendant AssetWorks because, *inter alia,* AssetWorks is a Delaware corporation, AssetWorks has done and continues to do business in the State of Delaware, and upon information and belief, AssetWorks has committed and continues to commit acts of patent infringement in the State of Delaware, including making, offering for sale, selling, installing, and maintaining accused products and systems in the State of Delaware.

6. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b) because, *inter alia*, both Plaintiff PMI and Defendant AssetWorks were organized and/or incorporated in Delaware, Plaintiff's principal place of business is located in this judicial district, the Patent-in-Suit, as defined below, is assigned to Plaintiff, Defendant is subject to personal jurisdiction in this district, and, upon information and belief, Defendant has committed and continues to commit acts of patent infringement in this district, including making, offering for sale, selling, installing, and maintaining accused products and systems in this district.

PATENT-IN-SUIT

7. On October 25, 2005, the United States Patent and Trademark Office duly and lawfully issued U.S. Patent No. 6,958,701 (the "'701 Patent" or the "Patent-in-Suit"), entitled "Transportation Monitoring System For Detecting The Approach Of A Specific Vehicle," based upon an application filed by inventors John D. Storkamp, Mark A. Storkamp, and Ronald H. Menzhuber. A true and correct copy of the '701 Patent is attached hereto as Exhibit A.

8. The '701 Patent generally relates to systems for detecting approach or proximity of vehicles and/or transmitters.

9. PMI is the owner of the '701 Patent and has the right to sue and recover damages for infringement thereof.

FACTUAL ALLEGATIONS

10. As referred to in this Complaint, and consistent with 35 U.S.C. § 100 (c), the "United States" means "the United States of America, its territories and possessions."

11. Upon information and belief, including based on the products identified on AssetWorks websites and described in AssetWorks advertisements and brochures, AssetWorks makes, imports, offers to sell, and/or sells products and systems made in accordance with the '701 Patent, including, but not limited to the AssetWorks GPS Solution and the AssetWorks Real-Time Location System.

COUNT I: INFRINGEMENT OF THE '701 PATENT BY ASSETWORKS

12. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

13. Upon information and belief, defendant AssetWorks has infringed claims of the '701 Patent pursuant to 35 U.S.C. § 271 (a) by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States the AssetWorks GPS Solution, which infringes at least claims 1-2 and 4-17 of the '701 Patent, and the AssetWorks Real-Time Location System, which infringes at least claims 1-11 and 13-18 of the '701 Patent. Upon information and belief, AssetWorks' infringement pursuant to 35 U.S.C. § 271 (a) is ongoing.

14. Upon information and belief, defendant AssetWorks has committed the foregoing infringing activities without license from PMI.

15. As a result of AssetWorks' infringement of the '701 Patent, PMI has suffered monetary damages and is entitled to a money judgment in an amount adequate to compensate for AssetWorks's infringement, but in no event less than a reasonable royalty, together with interest and costs.

PRAYER FOR RELIEF

WHEREFORE, PMI prays for judgment in its favor against AssetWorks granting PMI the following relief:

A. Entry of judgment in favor of PMI against AssetWorks on all counts;

B. Entry of judgment that AssetWorks has infringed the ’701 Patent;

C. Award of compensatory damages adequate to compensate PMI for AssetWorks infringement of the ’701 Patent;

D. PMI’s costs;

E. Pre-judgment and post-judgment interest on PMI’s award; and

F. All such other and further relief as the Court deems just or equitable.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Fed. R. Civ. P., PMI hereby demands trial by jury in this action of all claims so triable.

Dated: May 1, 2014

Respectfully submitted,

FARNAN LLP

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