UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of

CERTAIN NAVIGATION PRODUCTS, INCLUDING GPS DEVICES, NAVIGATION AND DISPLAY SYSTEMS, RADAR SYSTEMS, NAVIGATIONAL AIDS, MAPPING SYSTEMS AND RELATED SOFTWARE

Investigation No. 337-TA-_____

COMPLAINT UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED

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I. INTRODUCTION

1. Furuno Electric Co., Ltd. ("Furuno Electric") and Furuno U.S.A, Inc. ("FUSA") (collectively, "Complainants" or "Furuno") respectfully request that the United States International Trade Commission ("the Commission") institute an investigation into violations of Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 ("Section 337").

2. The proposed respondents include Garmin Ltd., Garmin International, Inc., Garmin North America, Inc., and Garmin USA, Inc. (collectively, "Garmin"); Navico Holding AS, Navico UK Limited, and Navico, Inc. (collectively, "Navico"); and Raymarine UK Ltd. and Raymarine, Inc. (collectively, "Raymarine") (all collectively, "Respondents").

3. Respondents have engaged in unfair acts in violation of Section 337 through unlawful and unauthorized importation and/or sale for importation into the United States, and/or sale within the United States after importation, of certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software (collectively, the "Accused Products") that directly or indirectly infringe one or more claims of United States Patent Nos. 6,084,565 ("the '565 Patent"), 6,424,292 ("the '292 Patent"), 7,161,561 ("the '561 Patent") and 7,768,447 ("the '447 Patent") (collectively, the "Asserted Patents"), as indicated in the table below:

Proposed Respondent	**'565 Patent Claims**	**'292 Patent Claims**	**'561 Patent Claims**	**'447 Patent Claims**
Garmin	1-5, 7-20	1-6	1-10, 12, 14	1-25
Navico	1, 2, 4, 5, 7-20	1-6	1-10, 12, 14	1-6
Raymarine	1, 2, 4, 5, 7-20	-	1-10, 12, 14	-

4. Certified copies of the Asserted Patents accompany this Complaint as Exhibits 1-4. Furuno Electric owns by assignment the entire right, title and interest to each of these

patents. Certified copies of recorded assignments of the Asserted Patents accompany this Complaint as Exhibits 5-8.

5. As required by 19 U.S.C. §§ 1337(a)(2) and (3), an industry exists in the United States relating to the Asserted Patents and/or articles protected by the Asserted Patents. Furuno has made significant investments in plant and equipment and employment of labor and capital in the United States related to articles protected by the Asserted Patents through, *inter alia*, testing, service, warranty, repair, quality control, training, packaging, distribution, sales and marketing. Further, Furuno has made substantial domestic investment in the exploitation of the patents through, *inter alia*, research and development, technical support, and training.

6. Furuno seeks relief from the Commission in the form of a permanent limited exclusion order, pursuant to Section 337(d), prohibiting entry into the United States of all Respondents' imported navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software that are covered by one or more claims of the Asserted Patents. Furuno further seeks permanent cease and desist orders, pursuant to Section 337(f), prohibiting Respondents, their subsidiaries, related companies and agents from engaging in the importation, marketing and/or advertising, distribution, offering for sale, or sale of the Accused Products that infringe one or more claims of the Asserted Patents.

II. THE PARTIES

A. Complainants

7. Furuno Electric is a corporation organized under the laws of Japan, with its principal place of business at 9-52 Ashihara-cho, Nishinomiya City, Hyogo, 662-8580, Japan.

8. FUSA is a Washington corporation with its principal place of business at 4400 N.W. Pacific Rim Boulevard, Camas, Washington 98607.

9. Founded in 1948, Furuno Electric has grown to become a world leader in the design, manufacture and marketing of a wide variety of marine electronics, including navigation systems, GPS equipment, radar systems, and sonar. Furuno Electric is one of the leading manufacturers of marine electronics in the world and has long focused on the United States as a critical market for its products. In 1978, FUSA was established to engage in activities in the United States relating to marine electronics. As a result of consistent investment in design, research, development, testing, customer service, training, packaging, distribution, sales and marketing of its marine electronics, Furuno is one of the leading suppliers of marine electronics in the United States. Since 1971, Furuno has received 205 awards from the National Marine Electronics Association—more than any two other manufacturers combined.

B. Proposed Respondents

1. Garmin

10. On information and belief, Garmin Ltd. is a company organized and existing under the laws of Switzerland with its principal place of business at Mühlentalstrasse 2, 8200 Schaffhausen, Switzerland. On information and belief, Garmin Ltd. is in the business of engineering, designing, manufacturing, distributing and/or selling automotive, aviation and marine electronics. On information and belief, Garmin Ltd. sells for importation, imports, and/or sells after importation into the United States certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software. On information and belief, the defendants Garmin International, Inc., Garmin North America, Inc., and Garmin USA, Inc. are wholly owned subsidiaries of Garmin, Ltd. Garmin, Ltd. is incorporated in Switzerland and is a publicly traded entity whose shares trade in the United States on the NASDAQ market.

11. On information and belief, Garmin International, Inc. is a company organized and existing under the laws of Kansas with its principal place of business at 1200 East 151st Street, Olathe, Kansas 66062. On information and belief, Garmin International, Inc. is in the business of engineering, designing, manufacturing, distributing and/or selling automotive, aviation and marine electronics. On information and belief, Garmin International, Inc. sells for importation, imports, and/or sells after importation into the United States certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software.

12. On information and belief, Garmin North America, Inc. is a company organized and existing under the laws of Kansas with its principal place of business at 1200 East 151st Street, Olathe, Kansas 66062. On information and belief, Garmin North America, Inc. is in the business of engineering, designing, manufacturing, distributing and/or selling automotive, aviation and marine electronics. On information and belief, Garmin North America, Inc. sells for importation, imports, and/or sells after importation into the United States certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software.

13. On information and belief, Garmin USA, Inc. is a company organized and existing under the laws of Kansas with its principal place of business at 1200 East 151st Street, Olathe, Kansas 66062. On information and belief, Garmin USA, Inc. is in the business of engineering, designing, manufacturing, distributing and/or selling automotive, aviation and marine electronics. On information and belief, Garmin USA, Inc. sells for importation, imports, and/or sells after importation into the United States certain navigation products, including GPS

devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software.

2. Navico

14. On information and belief, Navico Holding AS is a privately held company organized and existing under the laws of Norway with its principal place of business at Nyåskaiveien 2, 4370 Egersund, Norway. On information and belief, Navico Holding AS is in the business of engineering, designing, manufacturing, distributing and/or selling marine electronics. On information and belief, Navico Holding AS sells for importation, imports, and/or sells after importation into the United States certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software. On information and belief, Navico Holding AS is the parent company of Navico UK Limited and Navico, Inc.

15. On information and belief, Navico UK Limited is a company organized and existing under the laws of the United Kingdom with its principal place of business at Premier Way, Abbey Park, Romsey Hampshire, S051 9DH, United Kingdom. On information and belief, Navico UK Limited is in the business of engineering, designing, manufacturing, distributing and/or selling marine electronics. On information and belief, Navico UK Limited sells for importation, imports, and/or sells after importation into the United States certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software.

16. On information and belief, Navico, Inc. is a company organized and existing under the laws of Delaware with its principal place of business at 4500 S. 129th East Avenue, Ste. 200, Tulsa, OK 74134. On information and belief Navico, Inc. is in the business of engineering, designing, manufacturing, distributing and/or selling marine electronics. On

information and belief, Navico, Inc. sells for importation, imports, and/or sells after importation into the United States certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software.

17. On information and belief, the Navico respondents sell for importation, import, and/or sell after importation into the United States certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software, under the following brand names: B&G, Eagle, Lowrance, Northstar and Simrad. The Navico respondents claim to be the world's largest marine electronics company.

3. Raymarine

18. On information and belief, Raymarine UK Limited is a company organized and existing under the laws of England and Wales and its principal place of business is at Marine House, Cartwright Drive, Fareham, PO15 5RJ, United Kingdom. On information and belief, Raymarine UK Limited is in the business of engineering, designing, manufacturing, distributing and/or selling marine electronics. On information and belief, Raymarine UK Limited sells for importation, imports, and/or sells after importation into the United States certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software.

19. On information and belief, Raymarine, Inc. is a company organized and existing under the laws of Delaware with its principal place of business at 9 Townsend West, Nashua, NH 03063. On information and belief, Raymarine, Inc. is in the business of engineering, designing, manufacturing, distributing and/or selling marine electronics. On information and belief, Raymarine, Inc. sells for importation, imports, and/or sells after importation into the United States certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software.

20. On information and belief, both Raymarine UK and Raymarine, Inc. are owned by Raymarine Holdings Limited. On information and belief, the Raymarine respondents manufacture certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software in Hungary and import such marine electronics into the United States, sell such marine electronics for importation into the United States, and/or sell such marine electronics after they have been imported into the United States.

III. THE TECHNOLOGY AND PRODUCTS AT ISSUE

21. The Asserted Patents relate to systems, devices, and methods for improving navigation, radar and map displays used in on-road vehicle, marine and aviation applications.

22. The Accused Products are electronic devices, components thereof and related software used in on-road vehicle, marine and aviation applications involving navigation and display systems, radar systems, navigational aids, mapping systems and related software.

23. The accused on-road vehicle display devices include, but are not limited to, the Garmin nuvi, zūmo, dēzl, and Street Pilot series of products, that infringe at least claims 1, 2 and 11-20 of the '565 Patent.[1]

24. The accused aviation navigation devices include, but are not limited to, the Garmin aera series of products that infringe at least claims 1, 2, 3 and 11-20 of the '565 Patent.

25. The accused marine devices include, but are not limited to, the Garmin GPSMAP 400, GPSMAP 500, GPSMAP 700, GPSMAP 4000, GPSMAP 4200, GPSMAP 5000, GPSMAP

[1] The products enumerated in Paragraphs 23-27 are merely illustrative of the types and classes of infringing products that Respondents import into the United States, sell for importation into the United States, and/or sell within the United States after importation in violation of Section 337. Discovery may reveal that additional claims are infringed by the Accused Products and/or that additional products and categories of products infringe the Asserted Patents.

6000, GPSMAP 7000, GPSMAP 8000, echoMAP, GMR, and GMM series of products; the Navico Lowrance HDS Gen2 Touch, HDS Gen2, HDS, and Broadband Radar series of products; the Navico B&G Zeus, Zeus Touch, and Broadband Radar series of products; the Navico Northstar 6000i, 6100i, 8000i, M84, M121, Broadband Radar, and HD Radar series of products; the Navico Simrad NSO, NSE, NSS, TX, and Broadband Radar series of products; and the Raymarine a, c, e, and gS series of products that infringe at least claims 1, 2, 4, 5 and 7-20 of the '565 Patent.

26. In addition, the accused marine devices include, but are not limited to, the Garmin GPSMAP 4000, GPSMAP 4200, GPSMAP 5000, GPSMAP 6000, GPSMAP 7000, GPSMAP 8000, GMR, and GMM series of products; the Navico Lowrance HDS Gen2 Touch, HDS Gen2, HDS, and Broadband Radar series of products; the Navico B&G Zeus, Zeus Touch, and Broadband Radar series of products; the Navico Northstar 6000i, 6100i, 8000i, M84, M121, Broadband Radar, and HD Radar series of products; the Navico Simrad NSO, NSE, NSS, TX, and Broadband Radar series of products; and the Raymarine a, c, e, and gS series of products that infringe at least claims 1-10, 12, and 14 of the '561 Patent.

27. Further, the accused marine devices include, but are not limited to, the Garmin GPSMAP 700, GPSMAP 6000, GPSMAP 7000, GPSMAP 8000, GMR, and GMM series of products that infringe claims 1-6 of the '292 Patent and claims 1-25 of the '447 Patent.

28. Additionally, the accused marine devices include, but are not limited to, the Navico Lowrance HDS Gen2 Touch, HDS Gen2, HDS, and Broadband Radar series of products; the Navico B&G Zeus, Zeus Touch, and Broadband Radar series of products; the Navico Northstar 6000i, 6100i, 8000i, M84, M121, Broadband Radar, and HD Radar series of products;

the Navico Simrad NSO, NSE, NSS, TX, and Broadband Radar series of products that infringe claims 1-6 of the '292 Patent and at least claims 1-6 of the '447 patent.

IV. THE ASSERTED PATENTS

A. The '565 Patent

1. Identification and Ownership of the '565 Patent

29. Furuno Electric currently owns by assignment the entire right, title and interest in United States Patent No. 6,084,565, titled "Image monitoring apparatus," which issued on July 4, 2000, naming Yoshiyuki Kiya as the inventor. A certified copy of the '565 Patent is attached as Exhibit 1; a certified copy of the recorded assignment from the named inventor to Furuno Electric is attached as Exhibit 5.

30. Pursuant to Rule 210.12(c) of the Commission's Rules of Practice and Procedure, this Complaint is accompanied by the following: (1) a certified copy and three additional copies of the prosecution history of the '565 Patent (Appendix A); and (2) four copies of each reference document mentioned in the prosecution history (Appendix E).

2. Foreign Counterparts to the '565 Patent

31. Pursuant to Commission Rule 210.12(a)(9)(v), Exhibit 9 identifies the foreign patents or patent applications corresponding to the '565 Patent. No other patent or patent application has been issued, withdrawn, abandoned, rejected, or remains pending.

3. Non-Technical Description of the '565 Patent[2]

32. Conventional vehicle display systems, whether for automobiles, airplanes, or ships, have been configured to display images from one or more sources, such as radar, sonar,

[2] All non-technical descriptions of the inventions herein are presented to provide a general background of those inventions. These statements are not intended to be used nor should they be used for purposes of patent claim interpretation. Complainants present these statements subject to and without waiver of their right to propose claim constructions based on applicable claim interpretation jurisprudence and relevant intrinsic and extrinsic evidence.

GPS, or weather. But presenting images from these sources in ways both clear and useful to a user has remained challenging, particularly when navigating the vehicle through areas requiring precise guidance or having significant traffic or obstacles. The inventive display system of the '565 Patent addresses these challenges by providing an improved user experience, enhancing user safety, and increasing the flexibility in how and which images are displayed.

33. In particular, the display system disclosed in the '565 Patent utilizes a windowing system that enables images to be displayed independently in different windows. The independent display in different windows provides multiple advantages including the ability to display images that are aligned independently, to zoom in on images in one window, and to present part of an image from one window in a different window. With these advantages, a user can monitor a navigation area in one window and display a portion of interest in the navigation area, such as a portion showing another vehicle, in another window. As a result, the user can recognize areas of concern in a large monitoring area while keeping track of specific areas of concern, such as another vehicle. Moreover, by enabling the images to be displayed independently with independent alignments, the user can continuously keep track of the monitoring area around the user's vehicle without losing track of the portion of interest, which improves vehicle safety.

34. The '565 Patent generally relates to, among other things, an image monitoring system capable of displaying a plurality of windows on a single screen and presenting part of an image shown on one window in another window. In certain claims, the system displays the images in each window independently. In addition, the images displayed in each window can have independent alignments. For other claims, the '565 Patent discloses a zooming image

displaying a zoomed-in portion of a larger area where the zooming image is aligned independently with the image showing the larger area.

4. Prior Litigation Involving the '565 Patent

35. The '565 Patent was the subject of Investigation No. 337-TA-810, *Certain Navigation Products, Components Thereof, and Related Software*, which was instituted by notice published in the Federal Register on October 6, 2011. 76 Fed. Reg. 62092. The investigation terminated based on settlement in March 2012. 77 Fed. Reg. 16562 (Mar. 21, 2012).

36. On or about September 30, 2011, Furuno filed a complaint for patent infringement in the United States District Court for the District of Oregon in which it asserted the '565 Patent. The case, captioned *Furuno Electric Co., LTD v. Honeywell International Inc. et al*, Case No. 3:11-cv-01196-AC, was dismissed without prejudice on February 9, 2012, based on a stipulated judgment of dismissal.

37. Additionally, contemporaneous with the filing of this complaint, Furuno has filed complaints for patent infringement against Respondents in the United States District Court for the District of Oregon, which assert the '565 Patent.

B. The '292 Patent

1. Identification and Ownership of the '292 Patent

38. Furuno Electric currently owns by assignment the entire right, title and interest in United States Patent No. 6,424,292, titled "Radar Device and the Like," which issued on July 23, 2002, naming Takumi Fujikawa and Motoji Kondo as inventors. A certified copy of the '292 Patent is attached as Exhibit 2; a certified copy of the recorded assignment from the named inventors to Furuno Electric is attached as Exhibit 6.

39. Pursuant to Rule 210.12(c) of the Commission's Rules of Practice and Procedure, this Complaint is accompanied by the following: (1) a certified copy and three additional copies

of the prosecution history of the '292 Patent (Appendix B); and (2) four copies of each reference document mentioned in the prosecution history (Appendix F).

2. Foreign Counterparts to the '292 Patent

40. Pursuant to Commission Rule 210.12(a)(9)(v), Exhibit 9 identifies the foreign patents or patent applications corresponding to the '292 Patent. No other patent or patent application has been issued, withdrawn, abandoned, rejected, or remains pending.

3. Non-Technical Description of the '292 Patent[3]

41. Devices for detecting information around a vehicle, such as radar or sonar, provide vehicle operators with valuable information needed to navigate accurately and safely. These devices typically allow the vehicle operator to change the detection range so that the vehicle operator can view the detected information on a display at different scales including over a wide area around the vehicle or in a narrow area close to the vehicle. Changing the detection range in conventional systems for displaying the detected information, however, renders the currently displayed information unusable. Until the device detects new information at the changed detection range, the display system has no detection information to display. The absence of this information creates a potentially dangerous situation for the vehicle operator, particularly when other vehicles are operating nearby.

42. The inventive system of the '292 Patent remedies this problem of prior conventional systems. Instead of simply deleting the detected information at a prior detection range, the system of the '292 Patent maintains that information and scales it to the changed

[3] All non-technical descriptions of the inventions herein are presented to provide a general background of those inventions. These statements are not intended to be used nor should they be used for purposes of patent claim interpretation. Complainants present these statements subject to and without waiver of their right to propose claim constructions based on applicable claim interpretation jurisprudence and relevant intrinsic and extrinsic evidence.

detection range. By maintaining and scaling the information detected at the prior detection range, the vehicle operator can continuously view the information while the device detects information at the new detection range. In addition, the system of the '292 Patent enables the information detected at both ranges to be merged together on the display so that the displayed information after the change in detection range appears seamless, which improves the user experience and enhances user safety.

43. The '292 Patent generally relates to, among other things, a display system for radar or similar devices that displays current and past video images on a display. For example, in some claims, a display system can include a current image video memory for storing the most recently received data and a past video memory for storing previously received data. The data from both memories can be superimposed and displayed on the display. In addition, when changing the range scale, data can be transferred back and forth between the past video memory and a buffer while shifting data to account for the changed range scale.

4. Prior Litigation Involving the '292 Patent

44. Contemporaneous with the filing of this complaint, Furuno has filed complaints for patent infringement against Respondents in the United States District Court for the District of Oregon, which assert the '292 Patent. The '292 Patent has not been the subject of any other previous litigation in any domestic court or agency. In addition, there has been no foreign court or agency litigation involving the '292 Patent or any of its counterparts.

C. The '561 Patent

1. Identification and Ownership of the '561 Patent

45. Furuno Electric currently owns by assignment the entire right, title and interest in United States Patent No. 7,161,561, titled "Display System," which issued on January 9, 2007, naming Kenzo Kitayama as the inventor. A certified copy of the '561 Patent is attached as

Exhibit 3; a certified copy of the recorded assignment from the named inventor to Furuno Electric is attached as Exhibit 7.

46. Pursuant to Rule 210.12(c) of the Commission's Rules of Practice and Procedure, this Complaint is accompanied by the following: (1) a certified copy and three additional copies of the prosecution history of the '561 Patent (Appendix C); and (2) four copies of each reference document mentioned in the prosecution history (Appendix G).

2. Foreign Counterparts to the '561 Patent

47. Pursuant to Commission Rule 210.12(a)(9)(v), Exhibit 9 identifies the foreign patents or patent applications corresponding to the '561 Patent. Additionally, there is another continuation of U.S. Patent Application No. 09/247,815 filed on February 9, 1999, now U.S. Patent No. 6,628,299, which is abandoned. No other patent or patent application has been issued, withdrawn, abandoned, rejected, or remains pending.

3. Non-Technical Description of the '561 Patent[4]

48. Display systems for a vehicle, such as on a ship, can display information from a variety of sources or measuring devices, such as radar, course plotters with a GPS, echo sounders, sonars, and weather receivers. In conventional display systems prior to the system of the '561 Patent, however, each measuring device was typically wired directly to a dedicated display unit or indicator. This arrangement created several problems. To view information from different measuring devices, the user had to move from one display unit to another. In addition,

[4] All non-technical descriptions of the inventions herein are presented to provide a general background of those inventions. These statements are not intended to be used nor should they be used for purposes of patent claim interpretation. Complainants present these statements subject to and without waiver of their right to propose claim constructions based on applicable claim interpretation jurisprudence and relevant intrinsic and extrinsic evidence.

requiring a dedicated display unit for each measuring device generates a significant expense while simultaneously using up limited available space on the vehicle to store the display units.

49. The '561 Patent discloses an improved system for providing relevant information, such as navigation or weather information, to occupants on a vehicle. Instead of having dedicated display units for each measuring device, each display unit is coupled to each of a plurality of measuring devices. In addition, each display unit allows a user to select from which measuring device to receive information independently of any other display unit. With the displays positioned at different locations and coupled to each measuring device, each occupant of the vehicle can have a display nearby that allows the occupant to view the information output from any of the measuring devices regardless of what is being provided to any of the other displays. The system of the '561 Patent thus reduces costs, reduces the use of space, and makes for more efficient and effective use of measuring devices.

50. In general, the '561 Patent relates to, among other things, a digital display system with multiple displays that allow users to selectively present one or more images from different measuring devices on each display. For example, a vehicle may include multiple measuring devices, such as a course plotter that incorporates or is connected to a GPS receiver, an echo sounder, and a radar. In some claims, these measuring devices are connected to multiple displays on the vehicle, each display capable of receiving information from any of the measuring devices and selectively displaying information received from the measuring devices.

4. Prior Litigation Involving the '561 Patent

51. The '565 Patent was the subject of Investigation No. 337-TA-810, *Certain Navigation Products, Components Thereof, and Related Software*, which was instituted by notice published in the Federal Register on October 6, 2011. 76 Fed. Reg. 62092. The investigation terminated based on settlement in March 2012. 77 Fed. Reg. 16562 (Mar. 21, 2012).

52. On or about September 30, 2011, Furuno filed a complaint for patent infringement in the United States District Court for the District of Oregon in which it asserted the '561 Patent. The case, captioned *Furuno Electric Co., LTD v. Honeywell International Inc. et al*, Case No. 3:11-cv-01196-AC, was dismissed without prejudice on February 9, 2012, based on a stipulated judgment of dismissal.

53. Additionally, contemporaneous with the filing of this complaint, Furuno has filed complaints for patent infringement against Respondents in the United States District Court for the District of Oregon, which assert the '561 Patent.

D. The '447 Patent

1. Identification and Ownership of the '447 Patent

54. Furuno Electric currently owns by assignment the entire right, title and interest in United States Patent No. 7,768,447, titled "Radar Apparatus and the Like," which issued on August 3, 2010, naming Brice Pryszo, Iker Pryszo, Mathieu Jacquinot, Oliver Robin, Makoto Obuchi, and Koji Tokuda as inventors. A certified copy of the '447 Patent is attached as Exhibit 4; a certified copy of the recorded assignment from the named inventors to Furuno Electric is attached as Exhibit 8.

55. Pursuant to Rule 210.12(c) of the Commission's Rules of Practice and Procedure, this Complaint is accompanied by the following: (1) a certified copy and three additional copies of the prosecution history of the '447 Patent (Appendix D); and (2) four copies of each reference document mentioned in the prosecution history (Appendix H).

2. Foreign Counterparts to the '447 Patent

56. Pursuant to Commission Rule 210.12(a)(9)(v), Exhibit 9 identifies the foreign patents or patent applications corresponding to the '447 Patent. No other patent or patent application has been issued, withdrawn, abandoned, rejected, or remains pending.

3. Non-Technical Description of the '447 Patent[5]

57. The inventive system of the '447 Patent provides an additional feature to the inventive system of the '292 Patent. As previously noted, changing the detection range in conventional systems for displaying detected information rendered the currently displayed information unusable. The loss of the currently displayed information created a potentially dangerous situation for a vehicle operator. With no information displayed, the vehicle operator could lose track of nearby objects, such as other vehicles, and be unable to determine how to navigate to avoid the object. The vehicle operator may also be confused about how newly displayed information fit with displayed information at the prior detection range. If the vehicle operator did not understand how objects displayed at the new detection range corresponded to the same objects at the prior detection range, vehicle operator decision-making could be delayed or impaired, thus increasing the chance of an accident.

58. The inventive system of the '447 Patent reduces any confusion to the vehicle operator by making the transition between detection ranges appear smoothly to the vehicle operator. Not only is the information detected at the prior detection range maintained and scaled, the scaling can be performed multiple times between the prior detection range and the new detection range. By displaying the scaled information at each of these intermediate ranges prior to reaching the new detection range, the information presented to the vehicle operator smoothly transitions from the prior detection range to the new detection range. This smooth transition alleviates any confusion in the vehicle operator while helping to improve decision-making.

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[5] All non-technical descriptions of the inventions herein are presented to provide a general background of those inventions. These statements are not intended to be used nor should they be used for purposes of patent claim interpretation. Complainants present these statements subject to and without waiver of their right to propose claim constructions based on applicable claim interpretation jurisprudence and relevant intrinsic and extrinsic evidence.

59. The '447 Patent generally relates to, among other things, a display system for radar or similar devices that redraws a sensed image when a detection range is changed. In some claims, a display system can record and display a sensed image at a first detection range along with additional information, such as radar rings or target data. When the detection range is changed, a new image is created from the recorded image according to the scale of the changed detection range. The additional information is also adjusted according to the scale of the changed detection range. In other claims, when the detection range is changed, the image data of the sensed image can be transferred between areas while expanding or shrinking the image data.

4. Prior Litigation Involving the '447 Patent

60. Contemporaneous with the filing of this complaint, Furuno has filed complaints for patent infringement against Respondents in the United States District Court for the District of Oregon, which assert the '447 Patent. The '447 Patent has not been the subject of any other previous litigation in any domestic court or agency. In addition, there has been no foreign court or agency litigation involving the '447 Patent or any of its counterparts.

E. Licensees to the Asserted Patents

61. Licensees to one or more of the Asserted Patents are identified in Confidential Exhibit 10.

V. UNLAWFUL AND UNFAIR ACTS OF RESPONDENTS – PATENT INFRINGEMENT

62. Respondents have engaged in unlawful and unfair acts including the sale for importation into the United States, importation into the United States, and/or sale within the United States after importation of Accused Products that infringe one or more of at least the following claims: claims 1-5 and 7-20 of the '565 Patent, claims 1-6 of the '292 Patent, claims

1-10, 12, and 14 of the '561 Patent, and claims 1-25 of the '447 Patent (collectively, the "Asserted Claims").

63. Respondents have directly infringed and continue to directly infringe at least the Asserted Claims by, *inter alia,* their importation and sale of the Accused Products in the United States. In addition, Respondents also directly infringe the Asserted Claims by having their employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

64. Respondents know or have reason to know of the Asserted Patents. Nonetheless, Respondents have indirectly infringed and continue to indirectly infringe at least the Asserted Claims by inducing and/or contributing to infringement of the Asserted Patents.

65. On information and belief, Respondents actively induce others to infringe at least the Asserted Claims because they know or have reason to know that selling the Accused Products in the United States or selling the Accused Products for importation into the United States together with Respondent-created training seminars, videos, user manuals, operating instructions and other materials will cause others to practice the Asserted Claims and Respondents actively and intentionally aid and abet that infringement. (See, e.g., Exhibits 11-17).

A. The '565 Patent

66. Garmin has directly infringed and continues to directly infringe at least claims 1-5 and 7-20 of the '565 Patent by, *inter alia,* its importation and sale of the Accused Products in the United States. In addition, Garmin also directly infringes at least claims 1-5 and 7-20 of the '565 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

67. Additionally, on information and belief, Garmin has infringed and is continuing to infringe the '565 patent by contributing to and/or actively inducing the infringement by others of the '565 patent by the importation of aviation, marine and on-road navigation and/or tracking

products, including, but not limited to the nüvi 2457LMT, aera 500 and GPSMAP 7212/7215 products. Furuno reserves the right to contend that additional aviation, marine and on-road navigation and/or tracking products manufactured by Garmin indirectly infringe the '565 patent. On information and belief, the nüvi 2457LMT, aera 500 and GPSMAP 7212/7215 products and infringing components of these products, such as embedded software, are not staple articles of commerce with substantial non-infringing uses but are especially adapted for infringing the '565 patent and therefore contributorily infringe the '565 patent. On information and belief, Garmin further actively induces others, including users of aviation, marine and on-road navigation and/or tracking products manufactured by Garmin, to infringe the '565 patent through the sale of those products to customers along with Garmin-created training seminars, videos, user manuals, operating instructions and other materials that cause others to practice the '565 patent. (See, e.g., Exhibits 11-14).

68. Exhibits 18-20 are claim charts that compare asserted independent claims 1-5, 7-11 and 16 of the '565 Patent to representative Accused Products, including the Garmin nuvi 2457LMT, Garmin GPSMAP 7212/7215, and Garmin area 500, respectively. Documents referenced in these claim charts are attached as Exhibits 11, 12 and 14, respectively.

69. Navico has directly infringed and continues to directly infringe at least claims 1, 2, 4, 5, and 7-20 of the '565 Patent by, *inter alia,* its importation and sale of the Accused Products in the United States. In addition, Navico also directly infringes at least claims 1, 2, 4, 5, and 7-20 of the '565 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

70. Additionally, on information and belief, Navico has infringed and is continuing to infringe the '565 patent by contributing to and/or actively inducing the infringement by others of

the '565 patent by the importation of marine navigation and/or tracking products, including but not limited to the Simrad NSE8 and NSE12 products. Furuno reserves the right to contend that additional marine navigation and/or tracking products manufactured by Navico indirectly infringe the '565 patent. The Simrad NSE8 and NSE12 products and infringing components of these products, such as embedded software, are not staple articles of commerce with substantial non-infringing uses but are especially adapted for infringing the '565 patent and therefore contributorily infringe the '565 patent. On information and belief, Navico further actively induces others, including users of marine navigation and/or tracking products manufactured by Navico, to infringe the '565 patent through the sale of those products to customers along with Navico-created training seminars, videos, user manuals, operating instructions and other materials that cause others to practice the '565 patent. (See, e.g., Exhibits 15-16).

71. Exhibit 21 is a claim chart that compares asserted independent claims 1, 2, 4, 5, 7-11 and 16 of the '565 Patent to representative Accused Products, the Simrad NSE8 and NSE12 Multi-function Displays. Documents referenced in this claim chart are attached as Exhibits 15-16.

72. Raymarine has directly infringed and continues to directly infringe at least claims 1, 2, 4, 5, and 7-20 of the '565 Patent by, *inter alia,* its importation and sale of the Accused Products in the United States. In addition, Raymarine also directly infringes at least claims 1, 2, 4, 5, and 7-20 of the '565 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

73. Additionally, on information and belief, Raymarine has infringed and is continuing to infringe the '565 patent by contributing to and/or actively inducing the infringement by others of the '565 patent by the importation and/or importation of marine

navigation and/or tracking products, including but not limited to the a/c/e series of products. Furuno reserves the right to contend that additional marine navigation and/or tracking products manufactured by Raymarine indirectly infringe the '565 patent. The a/c/e series of products and infringing components of these products, such as embedded software, are not staple articles of commerce with substantial non-infringing uses but are especially adapted for infringing the '565 patent and therefore contributorily infringe the '565 patent. On information and belief, Raymarine further actively induces others, including users of marine navigation and/or tracking products manufactured by Raymarine, to infringe the '565 patent through the sale of those products to customers along with Raymarine-created training seminars, videos, user manuals, operating instructions and other materials that cause others to practice the '565 patent. (See, e.g., Exhibit 17).

74. Exhibit 22 is a claim chart that compares asserted independent claims 1, 2, 4, 5, 7-11 and 16 of the '565 Patent to a representative Accused Product line, the Raymarine a/c/e series of products. The document referenced in this claim chart is attached as Exhibit 17.

B. The '292 Patent

75. Garmin has directly infringed and continues to directly infringe claims 1-6 of the '292 Patent by, *inter alia,* its importation and sale of the Accused Products in the United States. In addition, Garmin also directly infringes claims 1-6 of the '292 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

76. Exhibit 23 is a claim chart that compares asserted independent claims 1 and 6 of the '292 Patent to representative Accused Products, the Garmin GPSMAP 7212 and 7215. Documents referenced in this claim chart are attached as Exhibits 12-13.

77. Navico has directly infringed and continues to directly infringe claims 1-6 of the '292 Patent by, *inter alia,* its importation and sale of the Accused Products in the United States.

In addition, Navico also directly infringes claims 1-6 of the '292 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

78. Exhibit 24 is a claim chart that compares asserted independent claims 1 and 6 of the '292 Patent to representative Accused Products, the Simrad NSE8 and NSE12 Multi-function Displays. Documents referenced in this claim chart are attached as Exhibits 15-16.

C. The '561 Patent

79. Garmin has directly infringed and continues to directly infringe at least claims 1-10, 12, and 14 of the '561 Patent by, *inter alia,* its importation and sale of the Accused Products in the United States. In addition, Garmin also directly infringes at least claims 1-10, 12, and 14 of the '561 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

80. Additionally, on information and belief, Garmin has infringed and is continuing to infringe the '561 patent by contributing to and/or actively inducing the infringement by others of the '561 patent by the importation of components of the patented system disclosed in the '561 patent, including marine navigation and/or tracking products such as the GPSMAP 7212 and GPSMAP 7215 products. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Garmin indirectly infringe the '561 patent. GPSMAP 7212 and GPSMAP 7215 products are not staple articles of commerce with substantial non-infringing uses but are especially adapted for infringing the '561 patent and therefore contributorily infringe the '561 patent. On information and belief, Garmin further actively induces others, including users of marine navigation and/or tracking products manufactured by Garmin, to infringe the '561 patent through the sale of those products to customers along with Garmin-created training seminars, videos, user manuals, operating instructions and other materials that cause others to practice the '561 patent. (See, e.g., Exhibits 12-13).

81. Exhibit 25 is a claim chart that compares asserted independent claims 1, 6, 8, 10, 12 and 14 of the '561 Patent to representative Accused Products, the Garmin GPSMAP 7212 and 7215. Documents referenced in this claim chart are attached as Exhibits 12-13.

82. Navico has directly infringed and continues to directly infringe at least claims 1-10, 12, and 14 of the '561 Patent by, *inter alia,* its importation and sale of the Accused Products in the United States. In addition, Navico also directly infringes at least claims 1-10, 12, and 14 of the '561 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

83. Additionally, on information and belief, Navico has infringed and is continuing to infringe the '561 patent by contributing to and/or actively inducing the infringement by others of the '561 patent by the importation of components of the patented system disclosed in the '561 patent, including marine navigation and/or tracking products such as the Simrad NSE8 and NSE12 products. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Navico indirectly infringe the '561 patent. The Simrad NSE8 and NSE12 products are not staple articles of commerce with substantial non-infringing uses but are especially adapted for infringing the '561 patent and therefore contributorily infringe the '561 patent. On information and belief, Navico further actively induces others, including users of marine navigation and/or tracking products manufactured by Navico, to infringe the '561 patent through the sale of those products to customers along with Navico-created training seminars, videos, user manuals, operating instructions and other materials that cause others to practice the '561 patent. (See, e.g., Exhibits 15-16).

84. Exhibit 26 is a claim chart that compares asserted independent claims 1, 6, 8, 10, 12 and 14 of the '561 Patent to representative Accused Products, the Simrad NSE8 and NSE12

Multi-function Displays. Documents referenced in this claim chart are attached as Exhibits 15-16.

85. Raymarine has directly infringed and continues to directly infringe at least claims 1-10, 12, and 14 of the '561 Patent by, *inter alia,* its importation and sale of the Accused Products in the United States. In addition, Raymarine also directly infringes at least claims 1-10, 12, and 14 of the '561 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

86. Additionally, on information and belief, Raymarine has infringed and is continuing to infringe the '561 patent by contributing to and/or actively inducing the infringement by others of the '561 patent by the importation of components of the patented system disclosed in the '561 patent, including marine navigation and/or tracking products, such as the a/c/e series products. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Raymarine indirectly infringe the '561 patent. The a/c/e/ series of products are not staple articles of commerce with substantial non-infringing uses but are especially adapted for infringing the '561 patent and therefore contributorily infringe the '561 patent. On information and belief, Raymarine further actively induces others, including users of marine products manufactured by Raymarine, to infringe the '561 patent through the sale of those products to customers along with Raymarine-created training seminars, videos, user manuals, operating instructions and other materials that cause others to practice the '561 patent. (See, e.g., Exhibit 17).

87. Exhibit 27 is a claim chart that compares asserted independent claims 1, 6, 8, 10, 12 and 14 of the '561 Patent to a representative Accused Product line, the Raymarine a/c/e series of products. The document referenced in this claim chart is attached as Exhibit 17.

D. The '447 Patent

88. Garmin has directly infringed and continues to directly infringe claims 1-25 of the '447 Patent by, *inter alia,* its importation and sale of the Accused Products in the United States. In addition, Garmin also directly infringes claims 1-25 of the '447 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

89. Additionally, on information and belief, Garmin has infringed and is continuing to infringe the '447 patent by contributing to and/or actively inducing the infringement by others of the '447 patent by the importation of marine navigation and/or tracking products including, but not limited to, GPSMAP 7212 and GPSMAP 7215 products. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Garmin indirectly infringe the '447 patent. GPSMAP 7212 and GPSMAP 7215 products and infringing components of these products, such as embedded software, are not staple articles of commerce with substantial non-infringing uses but are especially adapted for infringing the '447 patent and therefore contributorily infringe the '447 patent. On information and belief, Garmin further actively induces others, including users of marine navigation and/or tracking products manufactured by Garmin, to infringe the '447 patent through the sale of those products to customers along with Garmin-created training seminars, videos, user manuals, operating instructions and other materials that cause others to practice the '447 patent. (See, e.g., Exhibits 12-13).

90. Exhibit 28 is a claim chart that compares asserted independent claims 1, 9, 13 and 21 of the '447 Patent to representative Accused Products, the Garmin GPSMAP 7212 and 7215. Documents referenced in this claim chart are attached as Exhibits 12-13.

91. Navico has directly infringed and continues to directly infringe at least claims 1-6 of the '447 Patent by, *inter alia,* its importation and sale of the Accused Products in the United

States. In addition, Navico also directly infringes at least claims 1-6 of the '447 Patent by having its employees or agents operate, test, and/or demonstrate the Accused Products in the United States.

92. Additionally, on information and belief, Navico has infringed and is continuing to infringe the '447 patent by contributing to and/or actively inducing the infringement by others of the '447 patent by the importation of marine navigation and/or tracking products including, but not limited to, the Simrad NSE8 and NSE12 products. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Navico indirectly infringe the '447 patent. The Simrad NSE8 and NSE12 products and infringing components of these products, such as embedded software, are not staple articles of commerce with substantial non-infringing uses but are especially adapted for infringing the '447 patent and therefore contributorily infringe the '447 patent. On information and belief, Navico further actively induces others, including users of marine navigation and/or tracking products manufactured by Navico, to infringe the '447 patent through the sale of those products to customers along with Navico-created training seminars, videos, user manuals, operating instructions and other materials that cause others to practice the '447 patent. (See, e.g., Exhibits 15-16).

93. Exhibit 29 is a claim chart that compares asserted independent claim 1 of the '447 Patent to representative Accused Products, the Simrad NSE8 and NSE12 Multi-function Displays. The document referenced in this claim chart is attached as Exhibit 15.

VI. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE

94. Respondents sell for importation, import, and/or sell after importation certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software that infringe the Asserted Patents.

95. The specific instances of importation of infringing Accused Products set forth below are representative examples of Respondents' unlawful importation, sale for importation, and/or sale within the United States after importation of infringing products.

96. On information and belief, the Garmin Accused Products are manufactured abroad and imported into the United States.

97. For example, on information and belief, Garmin's consumer and portable aviation products, which include the aera series of products, are manufactured by Garmin Corporation, Garmin Ltd's Taiwanese subsidiary, in Taiwan. (Exhibit 30 at 16, 38).

98. Additionally, a Garmin nuvi 2457LMT was sold in the United States after importation at a retail store in Vancouver, Washington on July 21, 2013, as shown in Exhibit 31. The Garmin nuvi 2457LMT and its packaging indicate that it was "Made in Taiwan." (Exhibit 32).

99. A Garmin GPSMAP 7215 was purchased in the United States after importation from a retailer located in California at least on January 26, 2011, as shown in Exhibit 33. The Garmin GPSMAP 7215 and its packaging indicate that it was "Made in Taiwan." (Exhibit 34). A print out from Garmin's website indicating that the Garmin GPSMAP 7215 was offered for sale within the United States as recently as August 16, 2013, is attached as Exhibit 35.

100. A Garmin aera 500 was sold in the United States after importation from an online retailer at least on July 22, 2013, as shown in Exhibit 36. The packaging accompanying the Garmin aera 500 indicates that it was "Made in Taiwan." (Exhibit 37).

101. On information and belief, the Navico Accused Products are manufactured abroad and imported into the United States.

102. A Simrad (Navico) NSE12 Multifunction Display was sold in the United States after importation from a retailer located in California at least on June 27, 2012, as shown in Exhibit 38. The packaging accompanying the Navico NSE12 Multifunction Display indicates that it was "Made in Mexico." (Exhibit 39). A print out from Simrad's website indicating that the Navico NSE12 Multifunction Display was offered for sale within the United States as recently as August 16, 2013, is attached as Exhibit 40.

103. On information and belief, the Raymarine Accused Products are manufactured abroad and imported into the United States.

104. A Raymarine e7 Multi-Function Display was sold in the United States after importation from a retailer located in California at least on April 9, 2012, as shown in Exhibit 41. The Raymarine e7 Multi-Function Display and its packaging indicate that it was "Made in China." (Exhibit 42). A print out from an online retailer's website indicating that the Raymarine e7 Multi-Function Display was still available for purchase within the United States as recently as August 16, 2013, is attached as Exhibit 43.

VII. CLASSIFICATION OF THE INFRINGING PRODUCTS UNDER THE HARMONIZED TARIFF SCHEDULE

105. On information and belief, the infringing Accused Products of Respondents may be classified under at least the following headings and subheadings of the Harmonized Tariff Schedule of the United States ("HTSUS"): 8526.10, 8526.91, 8528.49, 8529.10, and 8529.90, *et seq.*[6]

[6] These HTSUS numbers are based on Complainants' current knowledge. They are not intended to nor should they be interpreted to restrict the devices and products accused.

VIII. THE DOMESTIC INDUSTRY RELATING TO THE ASSERTED PATENTS

106. A domestic industry as required by 19 C.F.R. §§ 1337(a)(2) and (a)(3) relating to the Asserted Patents and articles protected by the Asserted Patents exists in the United States. (*See* Confidential Exhibit 44). Each of the Asserted Patents is important to Furuno's success in the highly competitive industry of navigational, radar and display devices by providing Furuno with patented features that are highly desired by consumers.

107. Furuno makes substantial U.S. investments and expenditures in the exploitation of the Asserted Patents including, *inter alia,* design, research and development, and engineering, and significant U.S. investments and expenditures in plant and equipment, and employment of labor and capital related to articles protected by the Asserted Patents including, *inter alia,* testing, customization, training, quality control, packaging, compliance, service, warranty and non-warranty repair, distribution, advertising, sales and marketing. Confidential Exhibit 44 is a declaration regarding Furuno's domestic industry, detailing Furuno's significant domestic investments in plant and equipment, significant domestic employment of labor and capital, and substantial domestic investments in the exploitation of, or related to, the Asserted Patents and articles protected by the Asserted Patents. These domestic activities are likely to increase in the future as a result of Furuno's increasing U.S. sales of marine electronics, including navigational products, as well as Furuno's expansion of its product offerings in the U.S. market, such as its NavNet 3D product line. *Id.*

A. The Domestic Industry Products (Technical Prong)

108. Many of Furuno's products practice the Asserted Patents. However, for purposes of outlining Furuno's satisfaction of the domestic industry requirement, Furuno has selected one representative product line, the NavNet 3D series of products, which includes the MFDBB Multi Function Display, MFD8 Multi Function Display, and MFD12 Multi Function Display.

109. Claim charts demonstrating that a representative device, the NavNet 3D Multifunction Display MFDBB, practices at least one independent claim of the '565, '292, '561 and '447 Patents are attached as Exhibits 45-48. The document referenced in these claim charts is attached as Exhibit 49. A physical sample of the NavNet 3D Multifunction Display MFDBB is available upon request.

B. United States Economic Activity Relating to the Domestic Industry Products (Economic Prong)

110. Furuno conducts significant activities in the United States relating to the technology of the Asserted Patents. As detailed in Confidential Exhibit 44, Furuno technical and non-technical personnel located in the United States are engaged in activities necessary to commercialize and support Furuno's navigational devices covered by the Asserted Patents and exploit the technologies claimed in the Asserted Patents. In addition, Furuno has made substantial investment in its research and development program that supports Furuno's navigation devices covered by the Asserted Patents, including investments in its facilities in the states of Washington and Maryland, as well as the employment of substantial technical staff and the necessary equipment to support them. *Id.* Furuno also invests in U.S.-based personnel who provide market feedback, product design, product updates and modifications, research and development, and engineering to help design a product that will be successful in the U.S. market. *Id.* Furuno invests in U.S.-based personnel who perform product packaging, distribution, testing, compliance, quality control and technical marketing to create a market-ready product. *Id.* Finally, Furuno invests in U.S.-based personnel who provide technical support, training, service, warranty and repair work to Furuno customers and dealers in the U.S. who have purchased Furuno's navigational devices. *Id.*

IX. RELIEF REQUESTED

111. Complainants respectfully request that the Commission:

(a) Institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, with respect to Respondents' violations of that section arising from the importation into the United States, sale for importation, and/or the sale within the United States after importation of certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software that infringe one or more claims of United States Patent Nos. 6,084,565, 6,424,292, 7,161,561 and 7,768,447;

(b) Set a target date of no more than 15 months;

(c) Schedule and conduct a hearing pursuant to Section 337(c) for the purposes of (i) receiving evidence and hearing argument concerning whether there has been a violation of Section 337, and (ii) following the hearing, determining that there has been a violation of Section 337;

(d) Issue a permanent limited exclusion order directed to products manufactured by or for Respondents, their subsidiaries, related companies and agents pursuant to 19 U.S.C. § 1337(d) excluding entry into the United States of certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software that infringe one or more of claims 1-5 and 7-20 of the '565 Patent, claims 1-6 of the '292 Patent, claims 1-10, 12, and 14 of the '561 Patent, and claims 1-25 of the '447 Patent;

(e) Issue permanent cease and desist orders pursuant to 19 U.S.C. § 1337(f) prohibiting Respondents, their subsidiaries, related companies and agents from engaging in the importation, sale for importation, marketing and/or advertising, distribution, offering for sale, sale, use after importation, sale after importation, or other transfer within the United States of certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software that infringe one or more of claims 1-5 and 7-20 of the '565 Patent, claims 1-6 of the '292 Patent, claims 1-10, 12, and 14 of the '561 Patent, and claims 1-25 of the '447 Patent;

(f) Impose a bond upon importation of infringing certain navigation products, including GPS devices, navigation and display systems, radar systems, navigational aids, mapping systems and related software during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j); and

(g) Issue such other and further relief as the Commission deems just and proper under the law, based on the facts determined by the investigation and the authority of the Commission.

Dated: September 23, 2013

Respectfully submitted,

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