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11 **THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 PROLINK SOLUTIONS, LLC, a Delaware
limited liability company; PROLINK
14 HOLDING CORP., a Delaware corporation,

15 Plaintiffs,

16 vs.

17 GPS INDUSTRIES, INC., a Nevada
corporation; UPLINK CORPORATION, a
18 Texas corporation; EL RIO GOLF CLUB,
LLC, a Delaware limited liability company;
19 CAMELBACK GOLF CLUB, a Delaware
corporation,

20 Defendants.

Case No.

COMPLAINT

**(Patent Infringement; Declaratory
Judgment)**

21
22 Plaintiff ProLink Solutions, LLC, and ProLink Holdings Corp. (collectively
23 “Plaintiffs”) by and through their undersigned counsel, as and for their Complaint against
24 Defendants GPS Industries, Inc., Uplink Corporation, El Rio Golf and Country Club, and
25 Camelback Golf Club (collectively “Defendants”) allege as follows:
26

1 **PARTIES**

2 1. Plaintiff ProLink Solutions, LLC (“ProLink”) is a Delaware corporation
3 having a principal place of business at 410 S. Benson Lane, Chandler, Arizona 85224.

4 2. Plaintiff ProLink Holdings Corp. is a Delaware corporation having a
5 principal place of business at 410 S. Benson Lane, Chandler, Arizona 85224.

6 3. Upon information and belief, Defendant El Rio Golf Club, LLC (“El Rio”) is a
7 Delaware corporation having its principal place of business at 1 Paseo El Rio, Mohave
8 Valley, Arizona 86440. Upon information and belief, El Rio is doing business in this judicial
9 district and is committing acts of patent infringement in this judicial district.

10 4. Upon information and belief, Defendant Camelback Golf Club (“Camelback”)
11 is a Delaware corporation having its principal place of business at 7847 North Mockingbird
12 Lane, Scottsdale, AZ 85253. Upon information and belief, Camelback is doing business in
13 this judicial district and is committing acts of patent infringement in this judicial district.

14 5. Upon information and belief, Defendant GPS Industries, Inc. (“GPSI”) is a
15 Nevada corporation with a parent or affiliate Canadian corporation of the same name and
16 having its principal place of business in Nevada. Upon information and belief, GPSI is doing
17 business in this judicial district and is committing acts of patent infringement in this judicial
18 district and elsewhere in the United States.

19 6. Upon information and belief, Defendant Uplink Corporation (“Uplink”) is a
20 Texas corporation having its principal place of business at 6500 River Place Boulevard,
21 Building 4, Suite #201, Austin, Texas 78730. Upon information and belief, Uplink is doing
22 business in this judicial district and is committing acts of patent infringement in this judicial
23 district and elsewhere in the United States.

24 **JURISDICTION AND VENUE**

25 7. This is an action for patent infringement under the patent laws of the United
26 States, 35 U.S.C. § 271, *et seq.*

1 E. For a declaration that Plaintiffs have not infringed and is not infringing any
2 claim of the '786 Patent;

3 F. For a declaration that the '786 Patent is invalid;

4 G. For increased damages and attorneys' fees pursuant to 35 U.S.C. §§ 284 and
5 285;

6 H. For interest and costs incurred in this action; and

7 I. For such other and further relief as the Court may deem just and proper.

8 RESPECTFULLY SUBMITTED this 1st day of November, 2007.

9 GALBUT & HUNTER
10 A Professional Corporation

11 By: s/ J. Blake Mayes, Esq.
12 Martin R. Galbut, Esq.
13 J. Blake Mayes, Esq.
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15 - and -

16 By: s/ A. Jason Mirabito, Esq.
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CERTIFICATE OF SERVICE (CM/ECF)

I hereby certify that on November 1, 2007 I electronically filed the foregoing with the Clerk of Court for filing and uploading to the CM/ECF system.

s/ J. Blake Mayes