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BY \_\_\_\_\_  
 2013 DEC -4 AM 11:09  
 CLERK U.S. DISTRICT COURT  
 CENTRAL DISTRICT OF CALIF.  
 SANTA ANA

FILED

7 Attorneys for Plaintiffs HID GLOBAL  
 8 CORPORATION, ASSA ABLOY AB and  
 DESTRON FEARING CORPORATION  
 9

10 UNITED STATES DISTRICT COURT  
 11 CENTRAL DISTRICT OF CALIFORNIA  
 12

13 HID GLOBAL CORPORATION, a  
 Delaware corporation; ASSA ABLOY  
 14 AB, a Swedish Limited Liability  
 Company; and DESTRON FEARING  
 15 CORPORATION, a Delaware  
 corporation,

16 Plaintiffs,

17 vs.

18 SOUND CRAFT, INC., a California  
 19 corporation; and DOES 1 through 10,  
 inclusive,

20 Defendants.  
 21

Case No. SACV13-01890 AG (ANx)

COMPLAINT FOR INJUNCTION  
AND DAMAGES FOR PATENT  
INFRINGEMENT

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT  
INFRINGEMENT

1 Plaintiffs HID GLOBAL CORPORATION (“HID”), ASSA ABLOY AB  
2 (“AAAB”) and DESTRON FEARING CORPORATION (“Destron”) (collectively,  
3 “Plaintiffs”), for their Complaint against defendants SOUNDCRAFT, INC.  
4 (“Soundcraft”), and DOES 1 through 10, inclusive (collectively, “Defendants”),  
5 allege as follows:

6 **JURISDICTION AND VENUE**

7 1. This is an action involving claims of patent infringement under Title  
8 35, United States Code. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331  
9 and 1338(a).

10 2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(b)  
11 and § 1391(c), as Defendants reside in this judicial district, have committed acts of  
12 infringement in this judicial district, and have a regular and established place of  
13 business in this judicial district.

14 **THE PARTIES**

15 3. HID is a Delaware corporation having its principal place of business  
16 located at 15370 Barranca Parkway, Irvine, California.

17 4. AAAB is a Limited Liability Company established under the laws of  
18 Sweden and having a principal place of business in Stockholm, Sweden. AAAB is  
19 HID’s parent company.

20 5. Destron is a Delaware corporation having its principal place of business  
21 located in St. Paul, Minnesota.

22 6. Plaintiffs are informed and believe, and thereon allege, that Soundcraft  
23 is a California corporation having its principal place of business located at 20301  
24 Nordhoff Street, Chatsworth, California 91311. On information and belief,  
25 Soundcraft sells and offers to sell the products that are the subject of this action  
26 through its Secura Key division.

27 7. The true names and capacities, whether individual, corporate, associate  
28 or otherwise, of defendants DOES 1 through 10, inclusive, are unknown to

1 Plaintiffs, which therefore sue said defendants by such fictitious names. Plaintiffs  
2 will seek leave of this Court to amend this Complaint to include their proper names  
3 and capacities when they have been ascertained. Plaintiffs are informed and believe,  
4 and based thereon allege, that each of the fictitiously named defendants participated  
5 in and is in some manner responsible for the acts described in this Complaint and  
6 the damage resulting therefrom.

7 8. Plaintiffs allege on information and belief that each of the defendants  
8 named herein as Does 1 through 10, inclusive, performed, participated in, or abetted  
9 in some manner, the acts alleged herein, proximately caused the damages alleged  
10 hereinbelow, and are liable to Plaintiffs for the damages and relief sought herein.

11 9. Plaintiffs allege on information and belief that, in performing the acts  
12 and omissions alleged herein, and at all times relevant hereto, each of the  
13 Defendants was the agent and employee of each of the other Defendants and was at  
14 all times acting within the course and scope of such agency and employment with  
15 the knowledge and approval of each of the other Defendants.

16 **HID'S BUSINESS**

17 10. HID is a leader in the delivery of secure identity solutions for millions  
18 of customers throughout the world. HID's identity solutions are used in a variety of  
19 applications, including physical access control, logical access control, access card  
20 printing and personalization, highly secure government identification and animal  
21 identification. HID's products, solutions and services are sold through a well-  
22 established network of OEMs, developers, systems integrators and distributors  
23 worldwide. End users of HID's products, solutions and services include businesses  
24 and organizations in virtually all industry sectors, including government, healthcare,  
25 retail, industrial, commercial, airports, ports, finance and education.

26 11. HID's physical access control products and solutions are sold under  
27 HID's well-known brands, including iCLASS®, SmartID®, HID® Prox and  
28 Indala® Prox. These industry leading products, include radio frequency

1 identification (“RFID”) readers and credentials that operate at low frequency  
2 (i.e., 125 kHz), high frequency (i.e., 13.56 MHz), or both.

3 **THE PATENT AT ISSUE**

4 12. HID owns or is a licensee to numerous patents and other intellectual  
5 property that relate to various aspects of HID’s business. The patent that is the  
6 subject of this action, United States patent no. 5,952,935 (the “’935 Patent”), relates  
7 generally to multi-technology readers and credentials.

8 13. The ‘935 Patent, entitled “Reprogrammable Channel Search Reader,”  
9 issued on September 14, 1999. Destron owns the ‘935 Patent. Pursuant to a license  
10 agreement dated September 21, 2007 (the “License Agreement”), Destron’s  
11 predecessor granted to Assa Abloy Identification Technology Group AB  
12 (“AAITG”) an exclusive license in certain fields to the ‘935 Patent. Destron’s  
13 predecessor further granted to AAITG the right to enforce the ‘935 Patent to the full  
14 extent of the license granted, including the right to file actions for patent  
15 infringement for any current or past infringement. By assignment, AAAB owns the  
16 rights granted to AAITG pursuant to the license from Destron’s predecessor. HID  
17 has a sublicense to the ‘935 Patent. Pursuant to the License Agreement, Destron’s  
18 predecessor, as owner of the ‘935 Patent, agreed to participate in any infringement  
19 action brought by AAITG, or its successor to the rights under the License  
20 Agreement, AAAB. Destron is named as a plaintiff in this action for that reason  
21 alone.

22 14. The ‘935 Patent generally discloses an RFID reader that is capable of  
23 reading identification signals from transponders that use different frequencies,  
24 different methods of modulation, and/or different methods of encoding to  
25 communicate with the RFID reader. Another key aspect of the ‘935 Patent provides  
26 that the RFID reader is programmable.

27 **SOUNDCRAFT’S INFRINGEMENT**

28 15. Soundcraft also is in the business of providing physical access control

1 solutions, including RFID readers that operate at 125 kHz carrier frequency.  
2 Soundcraft competes directly with HID, and sells and seeks to sell its RFID readers  
3 to various industry sectors, including those to which HID sells its products. As set  
4 forth below, certain of Soundcraft's readers incorporate inventions that are disclosed  
5 in and protected by the '935 patent.

6 **CLAIM FOR RELIEF**

7 **(Patent Infringement – '935 Patent)**

8 16. Plaintiffs reallege each and every allegation set forth in paragraphs 1  
9 through 15, inclusive, and incorporate them herein by this reference.

10 17. Defendants make, use, sell, offer for sale, and/or import into the United  
11 States products that meet each and every element of one or more claims of the '935  
12 patent. As such, Defendants have infringed and are infringing the '935 patent.

13 18. Plaintiffs have marked relevant products and/or product literature with  
14 the '935 Patent pursuant to 35 U.S.C. § 287. On information and belief, Defendants  
15 have had actual knowledge of the '935 Patent before and during their infringement  
16 of the '935 Patent. On information and belief, Defendants' infringement of the  
17 '935 patent has been and will continue to be willful, wanton and deliberate with full  
18 knowledge and awareness of Plaintiffs' patent rights.

19 19. Plaintiffs have been damaged in an amount to be determined at trial,  
20 but which is no less than a reasonable royalty, and irreparably injured by  
21 Defendants' infringing activities. Plaintiffs will continue to be so damaged and  
22 irreparably injured unless such infringing activities are enjoined by this Court.

23 20. Moreover, in light of the willful nature of Defendants' conduct, this  
24 case should be deemed "exceptional" under the Patent Laws. As a result, in addition  
25 to damages, Plaintiffs are entitled to enhanced damages and their attorneys' fees and  
26 costs incurred herein.

27 **PRAYER FOR RELIEF**

28 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

COMPLAINT FOR PATENT  
INFRINGEMENT

1           1.     That Defendants, their officers, directors, agents, servants, employees,  
2 and all persons and entities in active concert or participation with them, or any of  
3 them, be preliminarily and permanently enjoined and restrained from further  
4 infringement of the '935 Patent;

5           2.     A judgment by the Court that Defendants have infringed and are  
6 infringing the '935 Patent;

7           3.     An award of damages for infringement of the '935 Patent, together with  
8 prejudgment interest and costs, said damages to be trebled by reason of the  
9 intentional and willful nature of Defendants' infringement, as provided by 35 U.S.C.  
10 § 284;

11          4.     A determination that this case is "exceptional" under 35 U.S.C. § 285,  
12 and an award of Plaintiffs' reasonable attorneys' fees;

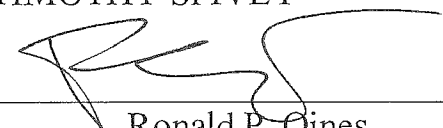
13          5.     That any monetary award include pre- and post-judgment interest at the  
14 highest rate allowed by law;

15          6.     For costs of suit; and

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

17 Dated: December 4, 2013

RUTAN & TUCKER, LLP  
MICHAEL T. HORNAK  
RONALD P. OINES  
BRADLEY A. CHAPIN  
TIMOTHY SPIVEY

18  
19  
20 By:   
21                   Ronald P. Oines  
22                   Attorneys for Plaintiffs HID GLOBAL  
23                   CORPORATION, ASSA ABLOY  
24                   AB, and DESTRON FEARING  
25                   CORPORATION  
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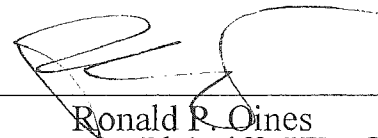
DEMAND FOR JURY TRIAL

Pursuant to Local Rule 38-1 of the Local Rules of the United States District Court for the Central District of California, Plaintiffs hereby demand a jury trial in this action.

Dated: December 4, 2013

RUTAN & TUCKER, LLP  
MICHAEL T. HORNAK  
RONALD P. OINES  
BRADLEY A. CHAPIN  
TIMOTHY SPIVEY

By: \_\_\_\_\_



Ronald P. Oines  
Attorneys for Plaintiffs HID GLOBAL CORPORATION, ASSA ABLOY AB and DESTRON FEARING CORPORATION

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge Andrew J. Guilford and the assigned Magistrate Judge is Arthur Nakazato.

The case number on all documents filed with the Court should read as follows:

SACV13-01890 AG (ANx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

December 4, 2013

Date

By M. Barr  
Deputy Clerk

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NOTICE TO COUNSEL

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

**Subsequent documents must be filed at the following location:**

Western Division  
312 N. Spring Street, G-8  
Los Angeles, CA 90012

Southern Division  
411 West Fourth St., Ste 1053  
Santa Ana, CA 92701

Eastern Division  
3470 Twelfth Street, Room 134  
Riverside, CA 92501

**Failure to file at the proper location will result in your documents being returned to you.**



CIVIL COVER SHEET



I. (a) PLAINTIFFS ( Check box if you are representing yourself )
HID GLOBAL CORPORATION, a Delaware corporation; ASSA ABLOY AB, a Swedish Limited Liability Company; and DESTRON FEARING CORPORATION, a Delaware corporation,

DEFENDANTS ( Check box if you are representing yourself )
SOUNDCRAFT, INC., a California corporation; and DOES 1 through 10, inclusive,

(b) County of Residence of First Listed Plaintiff Orange
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.
Michael T. Hornak SBN 81936 / Ronald P. Oines SBN 145016
Bradley A. Chapin SBN 232885 / Timothy Spivey SBN 269084
Rutan & Tucker, LLP
611 Anton Boulevard, Fourteenth Floor
Costa Mesa, CA 92626 Telephone: 714-641-5100

Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

II. BASIS OF JURISDICTION (Place an X in one box only.)
1. U.S. Government Plaintiff
2. U.S. Government Defendant
3. Federal Question (U.S. Government Not a Party)
4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant)
Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1
2 2
3 3
Incorporated or Principal Place of Business in this State
Incorporated and Principal Place of Business in Another State
Foreign Nation
PTF DEF
4 4
5 5
6 6

IV. ORIGIN (Place an X in one box only.)
1. Original Proceeding
2. Removed from State Court
3. Remanded from Appellate Court
4. Reinstated or Reopened
5. Transferred from Another District (Specify)
6. Multi-District Litigation

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check "Yes" only if demanded in complaint.)
CLASS ACTION under F.R.Cv.P. 23: Yes No
MONEY DEMANDED IN COMPLAINT: \$ According to proof.

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
This is an action involving claims of patent infringement under Title 35, United States Code.

Table with 6 columns: OTHER STATUTES, CONTRACT, REAL PROPERTY CONT., IMMIGRATION, PRISONER PETITIONS, PROPERTY RIGHTS. Each column contains a list of legal categories with checkboxes for selection.

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

<b>Question A: Was this case removed from state court?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF:		INITIAL DIVISION IN CACD IS:
	<input type="checkbox"/> Los Angeles		Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

<b>Question B: Is the United States, or one of its agencies or employees, a party to this action?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF? Then check the box below for the county in which the majority of DEFENDANTS reside.	A DEFENDANT? Then check the box below for the county in which the majority of PLAINTIFFS reside.	
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western	

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>C.1. Is either of the following true? If so, check the one that applies:</b> <input checked="" type="checkbox"/> 2 or more answers in Column C <input type="checkbox"/> only 1 answer in Column C and no answers in Column D  Your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question D, below.  If none applies, answer question C2 to the right. →	<b>C.2. Is either of the following true? If so, check the one that applies:</b> <input type="checkbox"/> 2 or more answers in Column D <input type="checkbox"/> only 1 answer in Column D and no answers in Column C  Your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question D, below.  If none applies, go to the box below. ↓
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Your case will initially be assigned to the WESTERN DIVISION.  
 Enter "Western" in response to Question D below.

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: →	SOUTHERN

IX(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed?  NO  YES

If yes, list case number(s): \_\_\_\_\_

IX(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case?  NO  YES

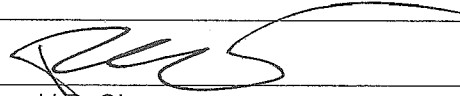
SACV10-1954 JVS (RNBx); SACV13-01272 JVS (RNBx); SACV13-01301 JVS (RNBx); and

If yes, list case number(s): SACV13-01302 JVS (RNBx) \_\_\_\_\_

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply)  A. Arise from the same or closely related transactions, happenings, or events; or  
 B. Call for determination of the same or substantially related or similar questions of law and fact; or  
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

X. SIGNATURE OF ATTORNEY  
 (OR SELF-REPRESENTED LITIGANT):

  
 Ronald P. Oines

DATE: December 4, 2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))