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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WILLIAM GRECIA,

Plaintiff,

v.

SONY NETWORK  
ENTERTAINMENT  
INTERNATIONAL LLC,

Defendant.

CASE NO. C 3:14-cv-969 EMC

**FIRST AMENDED COMPLAINT**

DEMAND FOR JURY TRIAL

Judge: Hon. Edward M. Chen

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**FIRST AMENDED COMPLAINT**

William Grecia brings this patent-infringement action against Sony Network Entertainment International LLC (“SNEI”).

**Parties**

1. William Grecia lives in Downingtown, Pennsylvania.
2. SNEI is a company organized under the laws of Delaware, with its principal place of business located at 6080 Center Drive, 10th Floor, Los Angeles, California 90045.

**Jurisdiction and Venue**

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*
4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).
5. This Court may exercise personal jurisdiction over SNEI. SNEI conducts continuous and systematic business in California and this District. For example, SNEI designs and manufactures computer software, consumer electronic products, and computers that SNEI licenses and sells in this District. SNEI uses a cloud-computing system that authorizes users in this District access to digital content such as movies and video games. This patent-infringement claim arises directly from SNEI’s continuous and systematic activity in this District. In short, this Court’s exercise of jurisdiction over SNEI would be consistent with the California long-arm statute, C.C.P. § 410.10, and traditional notions of fair play and substantial justice.
6. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)(2) and 1400(b).

**Background**

7. William Grecia owns United States Patent 8,533,860 (the “860 patent”) and at least one continuing application claiming back to the original priority date of March 21, 2010. William Grecia invented the methods and products claimed in the ‘860 patent.



1 SNEI's cloud computing service directly infringes claim 1 of the '860 patent.

2 15. Claim 1 is "[a] method for authorizing access to digital content using a cloud  
3 system . . . ." SNEI practices a method of authorizing access to digital content: "Get  
4 connected. Sony Entertainment Network instantly delivers music, movies, games and  
5 more." <http://www.sonyentertainmentnetwork.com/home>.

6 16. The method of claim 1 is one "facilitating access rights between a plurality of  
7 devices . . . ." SNEI sells its service as follows: "Watch, listen, play and share across  
8 multiple devices." <http://www.sonyentertainmentnetwork.com/home>.

9 17. According to the method of claim 1, a read or write request of metadata of the  
10 digital content is received. This request comprises a verification token of a user, such as, for  
11 example, the user's email address and password. "To create your account . . . fill in your  
12 email address (this will be your Sign-In ID) . . . ."  
13 [http://us.support.sonyentertainmentnetwork.com/app/answers/detail/a\\_id/14](http://us.support.sonyentertainmentnetwork.com/app/answers/detail/a_id/14).

14 18. A SNEI user requests access to her digital content by requesting that SNEI  
15 write her email address and password to metadata of the digital content: "Simply sign in  
16 with your existing ID and password and get started enjoying a whole host of digital  
17 entertainment services on the Sony Entertainment Network, Today!"  
18 [https://account.sonyentertainmentnetwork.com/pc/reg/account/create-](https://account.sonyentertainmentnetwork.com/pc/reg/account/create-account!input.action)  
19 [account!input.action](https://account.sonyentertainmentnetwork.com/pc/reg/account/create-account!input.action) .

20 19. In claim 1, after the verification token has been authenticated, a connection is  
21 established between a communications console and a server. The connection is established  
22 through a web service capable of facilitating a two-way exchange between the console and  
23 the server relaying the unique identity of the devices for which access to the digital content is  
24 sought. SNEI establishes a connection between the communications console (e.g., SNEI app  
25 running on device) and the SNEI servers. SNEI's web services capable of facilitating a two-  
26 way exchange to complete the verification process include Music Unlimited, Video  
27 Unlimited, and PlayStation Network. *See* SNEI's SEN Account Manager.  
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1           20.     Next, claim 1 involves the step of requesting an identification reference, such  
2 as a unique identifier associated with a device for which the user wishes access to digital  
3 content. SNEI apps request and receive a personal identification number, and the SNEI apps  
4 subsequently request and receive subscription account identifier and rights tokens pertaining  
5 to the SNEI account and cloud services.

6           21.     Finally, claim 1 involves writing either the verification token or the  
7 identification reference into the metadata. SNEI writes, among other things, the user's device  
8 information into the metadata stored on SNEI servers, authorizing the user access to the  
9 content stored on the servers: "PlayStation®Plus helps you discover a world of extraordinary  
10 gaming experiences through the ever-expanding collection of great games that members  
11 receive access to as part of their membership." <http://us.playstation.com/ps4/index.htm>.

12           22.     SNEI knows of the '860 patent and nonetheless willfully infringes the claims  
13 and contributes to the infringement of the claims. SNEI actually knows of the '860 patent.  
14 SNEI disclosed the '860 patent as prior art in patent application 13/312,184.

15           23.     SNEI sells devices that contain components for use in practicing the steps of  
16 the claims of the '860 patent. These components within these devices perform a material part  
17 of claims of the '860 patent. SNEI knows that these components on these devices are  
18 especially adapted for use in infringement of the '860 patent claims. These components on  
19 these devices are not suitable for a substantial non-infringing use.  
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**Prayer for Relief**

WHEREFORE, William Grecia prays for the following relief against SNEI:

- (a) Judgment that SNEI has directly infringed claims of the '860 patent claims;
- (b) Judgment that SNEI has contributed to the infringement of the '860 patent claims;
- (c) For a fair and reasonable royalty;
- (d) For treble damages based on a finding that the infringement of the '860 patent claims was willful;
- (e) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (f) For such other and further relief as the Court may deem just and proper.

**Demand for Jury Trial**

William Grecia demands a trial by jury on all matters and issues triable by jury.

Date: May 28, 2014

/s/ Matthew M. Wawrzyn

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