

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

2015 NOV 18 PM 4:05  
FILED

MD SECURITY SOLUTIONS LLC,

Plaintiff,

v.

Civil Action No. 6:15-cv-1967-ACC-KRS

JURY TRIAL DEMANDED

CENTURYLINK, INC.,

Defendant.

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff MD Security Solutions LLC (“MD Security”), by and through its counsel, hereby brings this action against CenturyLink, Inc. (“CenturyLink”) for infringement of United States Patent No. 7,864,983 (the “983 patent”) and alleges as follows:

**NATURE OF THE ACTION AND PARTIES**

1. This is a patent infringement action arising under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*
2. MD Security is a limited liability company organized and existing under the laws of the State of Delaware with its principal place of business at One Commerce Center, 1201 Orange Street, Suite 600, Wilmington, Delaware.
3. On information and belief, CenturyLink is a limited liability company organized and existing under the laws of the State of Louisiana, with principal places of business in Monroe, Louisiana. On information and belief, CenturyLink has its Southern Region Headquarters in Apopka, Florida.

## **JURISDICTION**

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a), as this is an action arising under the Patent Act, 35 U.S.C. § 1, *et seq.*

## **VENUE**

5. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c), 1391(d), and 1400(b) because a substantial part of the events giving rise to MD Security's claim occurred in the Middle District of Florida and because CenturyLink is either resident in or otherwise subject to personal jurisdiction in the Middle District of Florida.

## **FACTUAL BACKGROUND**

6. The '983 patent is titled "Security Alarm System." A copy of the '983 patent is attached hereto as Exhibit A.

7. The invention of the '983 patent generally relates to a security alarm system for protecting a structure using motion detectors and cameras. The claimed system and method of the '983 patent includes a handheld telecommunications unit, such as a touch screen, that transmits commands to and obtains images from cameras.

8. The application that issued as the '983 patent was filed on April 27, 2009, and the United States Patent and Trademark Office duly and legally issued the '983 patent on January 4, 2011. The '983 patent is a continuation of application No. 11/692,430 (now Patent No. 7,526,105) filed March 28, 2007, and claims priority of provisional application No. 60/743,894, filed on March 29, 2006, and provisional application No. 60/804,660 filed on June 14, 2006.

**COUNT I: INFRINGEMENT OF U.S. PATENT NO. 7,864,983**

9. MD Security realleges and incorporates by reference the allegations of paragraphs 1-8.

10. MD Security owns all right, title, and interest in the '983 patent, including the right to recover damages for infringement throughout the period of the infringement complained of herein.

11. CenturyLink has infringed the '983 patent by at least selling, offering to sell, and using a system and method for providing home security that directly infringes at least claims 1 and 11 of the '983 patent, either literally or under the doctrine of equivalents. CenturyLink's infringement includes, but is not limited to, providing CenturyLink Smart Home to its customers, which allows those customers to control a home security system, equipped with motion detectors and cameras arranged on or around a structure, from their CenturyLink Smart Home touch screen unit and smartphone, including obtaining images from the system and arming and disarming the system.

**PRAYER FOR RELIEF**

MD Security prays for relief as follows:

- a. Judgment that CenturyLink has infringed the '983 patent as alleged herein;
- b. Compensatory damages in an amount according to proof, and in no event less than a reasonable royalty;
- c. Prejudgment interest on all damages awarded to MD Security;
- d. Post-judgment interest on all sums awarded to MD Security from the date of the judgment;

- e. A preliminary and permanent injunction forbidding CenturyLink and its officers, agents, servants, employees, and attorneys, and all those in active concert or participation with them, from further infringing the '983 patent;
- f. Costs of suit incurred herein;
- g. An award of attorneys' fees pursuant to 35 U.S.C. § 285; and
- h. Any and all other relief that the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

MD Security Solutions LLC hereby demands a jury trial on all issues so triable.

Respectfully submitted November 18, 2015.

ALLEN, DYER, DOPPELT,  
MILBRATH & GILCHRIST, P.A.

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