

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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WILLIAM GRECIA,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendant.

**COMPLAINT**

**JURY TRIAL DEMANDED**

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William Grecia brings this patent-infringement action against Samsung Electronics America, Inc. (hereinafter, “Samsung”).

**Parties**

1. William Grecia is an individual. He maintains a residence in Downingtown, Pennsylvania.
2. Samsung is a New York company, having its principal place of business in New Jersey.

**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 Samsung. Samsung conducts

continuous and systematic business in New York and in this District. Samsung maintains corporate offices in this District. This patent-infringement case arises directly from Samsung's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over Samsung would be consistent with 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).

**Infringement of U.S. Patent No. 8,533,860**

7. William Grecia hereby realleges and incorporates by reference, as if fully set forth herein, the allegations of paragraphs 1-6 above.

8. William Grecia is the exclusive owner of the '860 patent, which is attached hereto as "Exhibit 1."

9. The '860 patent is valid and enforceable.

10. Samsung is infringing at least one of the 30 methods, systems, and apparatuses claimed in the '860 patent. For example, and for illustration of at least one of the 30 claims of the '860 patent that Grecia alleges that Samsung infringes, Samsung directly infringes claims 21, 22, 24, 25, 27, 28, 29, and 30 of the '860 patent. (*See* claim chart attached hereto as "Exhibit 2.")

**Prayer for Relief**

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

- (a) Judgment that Samsung has directly infringed claims of the '860 patent;
- (b) A reasonable royalty;
- (c) Pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) Post-judgment injunction; and

(e) 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 so triable.

Date: December 15, 2016

Respectfully Submitted,

/s/ Matthew M. Wawrzyn

Matthew M. Wawrzyn (*pro hac vice* pending)

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