

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|----------------------------|---|-------------|
| ROTHSCHILD BROADCAST | § | |
| DISTRIBUTION SYSTEMS, LLC, | § | |
| | § | |
| Plaintiff, | § | Case No: |
| | § | |
| vs. | § | PATENT CASE |
| | § | |
| UBIQUITI NETWORKS, INC. | § | |
| | § | |
| Defendant. | § | |
| | § | |

COMPLAINT

Plaintiff Rothschild Broadcast Distribution Systems, LLC (“Plaintiff” or “RBDS”) files this Complaint against Ubiquiti Networks, Inc. (“Defendant” or “Ubiquiti”) for infringement of United States Patent No. 8,856,221 (hereinafter “the ‘221 Patent”).

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company with an office at 1400 Preston Road, Suite 400, Plano, Texas 75093.

4. On information and belief, Defendant is a Delaware corporation with a principal place of business at 2580 Orchard Parkway, San Jose, CA 95131. On information and belief, Defendant’s registered agent for service of process is The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

5. On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7. Venue is proper pursuant to 28 U.S.C. § 1400(b) because Defendant is deemed to reside in this District because it is a Delaware corporation.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO 8,856,221)

8. Plaintiff incorporates paragraphs 1-7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

10. Plaintiff is the owner by assignment of the '221 Patent with sole rights to enforce the '221 Patent and sue infringers.

11. A copy of the '221 Patent, titled "System and Method for Storing Broadcast Content in a Cloud-based Computing Environment," is attached hereto as Exhibit A.

12. The '221 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. On information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '221 Patent by making, using, importing, selling, and/or offering for media content storage and delivery systems and services covered by one or more claims of the '221 Patent.

14. Defendant sells, offers to sell, and/or uses media content storage and delivery systems and services, including, without limitation, the Ubiquiti Networks Smart Home Security System and its components (e.g., UniFi security cameras, such as the UVC-G3-Micro, UVC-G3-AF, UVC-G3-DOME), the UniFi Video apps, and any similar products (“Product”), which infringes at least Claim 1 of the ‘221 Patent.

15. The Product includes a system for media content storage and delivery (e.g., videos captured from the Product’s security cameras can be stored and delivered to a smartphone or other computing platform). Certain aspects of this and other elements described herein are illustrated in the screenshots below.

Cameras

UniFi® G3 Video Camera

Models: UVC-G3, UVC-G3-AF

The UniFi Video Camera G3 features clear 1080p video resolution. The new ball joint mount design offers flexible 3-axis adjustment and can be mounted indoors or outdoors. The camera has infrared LEDs with an automatic IR cut filter for day and night surveillance. Available in a single-pack or 5-pack bundle.

- 1080p Full HD, 30 FPS
- EFL 3.6 mm, f/1.8
- Out door Weather Resistant
- 24V Passive PoE
- 802.3af Adapter (UVC-G3-AF only)
- Built-in Microphone
- Wall, Ceiling, or Pole Mount

https://dl.ubnt.com/datasheets/unifi/UniFi_Video_G3_DS.pdf





IP Camera/NVR
Management System

Software Release: 3.2

USER GUIDE

https://dl.ubnt.com/guides/unifivideo/UniFi_Video_UG.pdf

UniFi® Video is a powerful and flexible, integrated IP video management surveillance system designed to work with Ubiquiti's UniFi Video Camera product line. UniFi Video has an intuitive, configurable, and feature-packed user interface with advanced features such as motion detection, auto-discovery, user-level security, storage management, reporting, and mobile device support.

The UniFi Video software comes pre-installed on the UniFi NVR and requires no additional software installation. This chapter provides instructions for users who are not using the UniFi NVR and wish to install the UniFi Video software on a computer or other hardware platform that meets the system requirements listed below.

Supported Products

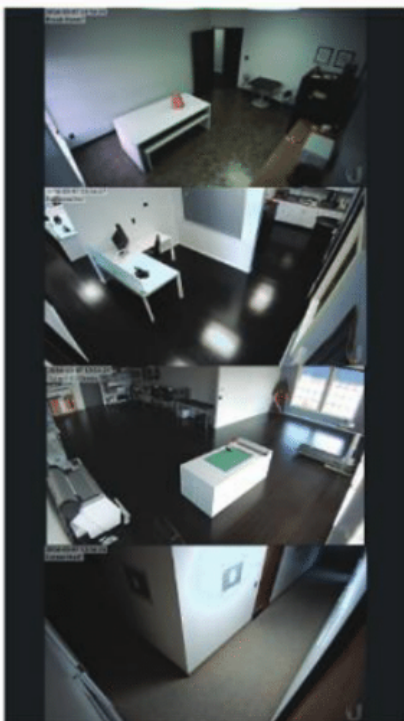
The following models of the UniFi Video Camera are supported by v3.2:

- UniFi Video Camera G3 (UVC-G3)
- UniFi Video Camera G3 Dome (UVC-G3-DOME)
- UniFi Video Camera (UVC)
- UniFi Video Camera Pro (UVC-Pro)

https://dl.ubnt.com/guides/unifivideo/UniFi_Video_UG.pdf

Multi-View Screen

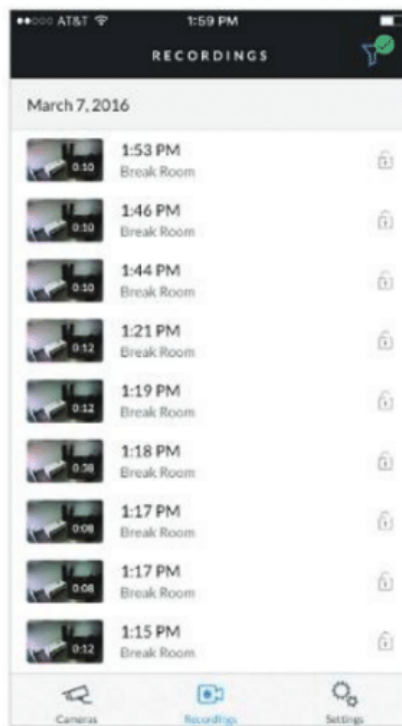
The *Multi-View* screen displays live video feeds from four cameras. By default, the first four cameras listed in the *Cameras* screen are displayed.

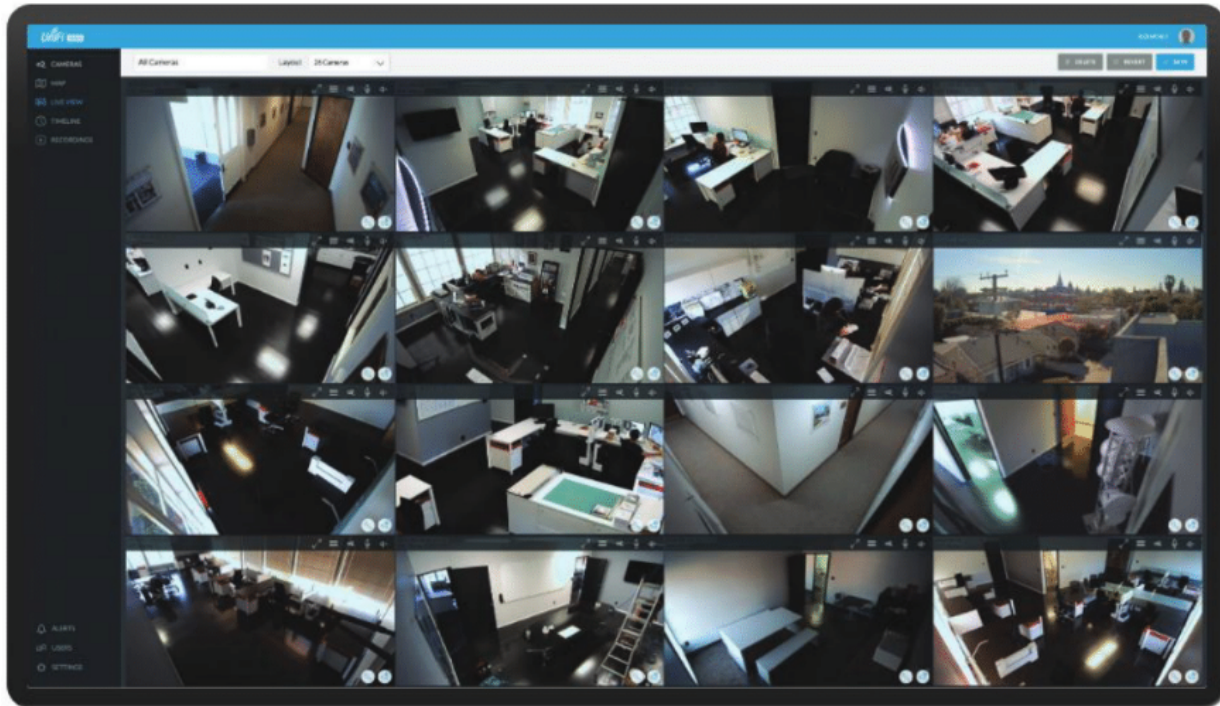


https://dl.ubnt.com/guides/unifivideo/UniFi_Video_UG.pdf

Recordings Screen

The *Recordings* screen displays a list of recently recorded video clips from all cameras that are known to the UniFi controller.



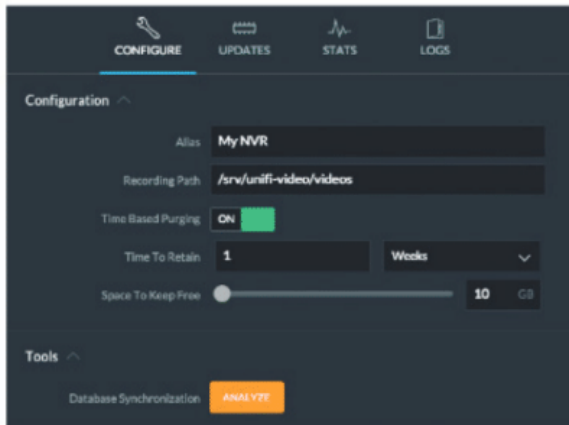


https://dl.ubnt.com/guides/unifivideo/UniFi_Video_UG.pdf

Memory Indicates the amount of memory used by the NVR (expressed in megabytes).

Disk Indicates the amount of disk space used on the NVR.

Configure Configuration

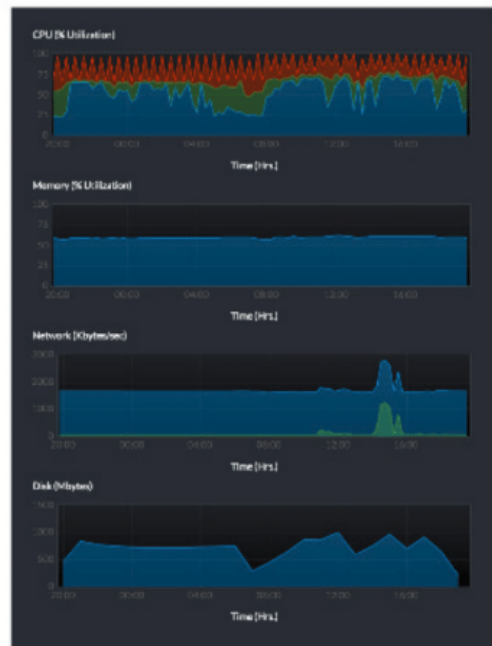


Alias Displays the current name of the NVR.

Recording Path Path to where video clip recordings are stored on the NVR.

Time Based Purging When enabled, recordings are deleted after the amount of time specified in the *Time To Retain* field.

https://dl.ubnt.com/guides/unifivideo/UniFi_Video_UG.pdf



CPU Displays percentage utilization of the NVR's processor over a 24-hour period.

Memory Displays percentage utilization of the NVR's memory over a 24-hour period.

Chapter 8: Users

(The *Users* section is available to administrators only.) This section allows you to manage user accounts on the NVR.

Name Displays the user's full name.

Username Displays the user's email address. This email address is used to log into the NVR.

User Group Displays the name of the user group that each NVR user belongs to.

User Details



Click any user account to open the *Details* window for that particular user.

Full Name Displays the selected user's full name.

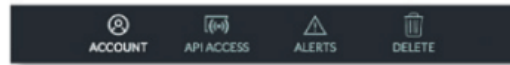
Usergroup Displays the name of the user group that the selected NVR user belongs to.

Last Logged In Displays the date and time when the selected user account last logged in to the NVR.

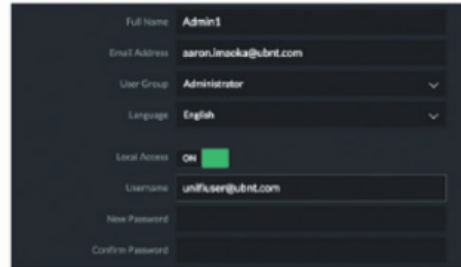
Last IP Address Displays the last IP address used to log in to the NVR (by the selected user account).

https://dl.ubnt.com/guides/unifivideo/UniFi_Video_UG.pdf

There are four clickable tabs below the user details: *Account*, *Password*, *API Access*, and *Delete*. (*Delete* is not displayed if you are viewing your own account.)



Account



Full Name View or edit the user's full name.

E-Mail Address View or edit the user's email address. This email address is used to log into the NVR.

User Group Select or edit the user group for this account. Click **Edit** to make changes to an existing user group. Refer to "**New User Group**" on page 29 for group options.

Language Select the user's language preference.

Local Access Used to enable or disable local access.

Launching UniFi Video

After you have set up UniFi Video on your NVR, launch UniFi Video from the cloud as follows:

1. Open the Chrome browser application on a computer with an Internet connection.
2. Enter **https://video.ubnt.com** in your browser's address field. Press **Enter** (PC) or **Return** (Mac).
3. Enter the *Username* and *Password* for your Ubiquiti account. Click **Sign In**.
4. UniFi Video will connect to your NVR and open.



Note: You can also launch UniFi Video from a computer on the same network as the NVR:

1. Open the Chrome browser application on a computer on the same network as the NVR.
2. Enter **https://<NVR_address>** in your browser's address field, where *NVR_address* is the NVR's IP address. Press **Enter** (PC) or **Return** (Mac).
3. Enter the *Username* and *Password* for your admin account on the NVR. Click **Sign In**.
4. The UniFi Video application will open.

https://dl.ubnt.com/guides/unifivideo/UniFi_Video_UG.pdf

Add User



| NAME | USERNAME | ROLE/GROUP |
|----------|----------------|------------|
| ADMIN | admin@ubnt.com | ADMIN |
| USER | user@ubnt.com | API User |
| API USER | api@ubnt.com | ADMIN |

To add a new user, click **Add User** on the top left corner of the window. The *Create New User* window will appear. Click each tab and fill out the requested information. The *Account* and *Password* tabs are required; the *API Access* tab is optional. When you are finished, click **Save**.



Create New User

ACCOUNT API ACCESS

Full Name

Email Address

User Group Select User Group

Language English

Local Access On

Username

Password

Confirm Password

SAVE

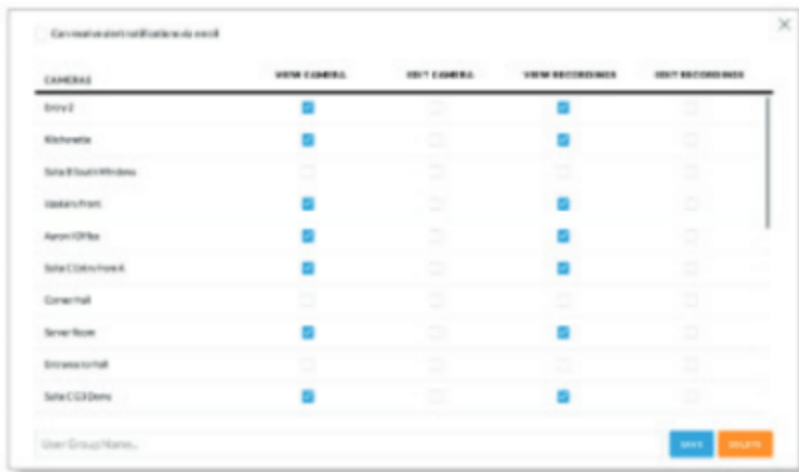
An e-mail invitation will be sent to the new user using the e-mail address you specified.

https://dl.ubnt.com/guides/unifivideo/UniFi_Video_UG.pdf

New User Group



If you select *New User Group*, the following window will appear:



- **Can receive alert notifications via email** Check this box to grant users (in this group) the ability to receive email notifications when the NVR generates an alert message.
- **View Camera, Edit Camera, View Recordings, Edit Recordings** Select which cameras and recordings can be accessed by users in this group by clicking the checkbox next to each camera in the list.

https://dl.ubnt.com/guides/unifivideo/UniFi_Video_UG.pdf

16. The Product necessarily includes at least one server for hosting and storing media content for customers. For example, the Product necessarily includes at least one server (e.g., a cloud server) to store recorded security videos.

17. The at least one server necessarily includes a first receiver configured to receive a request message including data indicating requested media content (e.g., the server must have

infrastructure to receive a request to store recorded security videos or to stream recorded video on a smartphone; additionally, the request message must contain data that identifies the video to be stored or streamed) and a consumer device identifier corresponding to a consumer device (e.g., the user credentials are used to tie a smartphone and user account to particular cameras and the videos they produce).

18. The Product necessarily includes a processor to determine whether the consumer device identifier corresponds to the registered consumer device (e.g., the server must authenticate a user's credentials to ensure that the credentials match those registered with a security camera which the user would like to access).

19. The Product provides for both media downloads and/or storage, and media streaming. A processor within the Product necessarily determines whether the request received from a customer is a request for storage (e.g., recording or storing content) or content (e.g., streaming of media content). The Product necessarily differentiates, via a processor, a user's request to store videos from a user's request to stream live content from the security camera.

20. The server verifies that media content identified in the media data of the storage request message (e.g., request to record content) is available for storage in order to prevent data errors that would result from attempting to store content that is not available for storage. For example, the server must verify that the media content (e.g. specific recording from a specific camera) identified in the media data of the storage request message is available for storage in order to prevent data errors that would result from attempting to store content that is not available for storage. Also, the server must verify that a particular security camera is adequately connected to the Internet as to allow for video recording and storage on the cloud. Additionally, the Product provides for restrictions on a user's storage amount and/or time; thus,

media content may not be available for storage depending on storage restrictions.

21. If a customer requests content (e.g., live streaming of media content), then a processor within the Product necessarily initiates delivery of the content to the customer's device. The server will initiate delivery of the requested media content to the consumer device (e.g. stream live camera feed to a smartphone or tablet) if the request message is a content request message (e.g. request for live streaming).

22. The media data includes time data that indicates a length of time to store the requested media content (e.g., a user is allowed to store videos up to a set time when purging takes place).

23. The server must first determine whether the requested media content exists prior to initiating delivery in order to prevent data errors that would result from attempting to transmit media content that does not exist (e.g., the server must verify that a particular security camera is adequately connected to the Internet as to allow for video recording and streaming).

24. After the processor determines whether the requested media content is available, it determines whether there are restrictions associated with the requested media content (e.g., storage limits, component protocols, permissions to third-parties such as friends, etc.).

25 Defendant's actions complained of herein will continue unless Defendant is enjoined by this Court.

26. Defendant's actions complained of herein is causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

27. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receives notice of the order from further infringement of United States Patent No. 8,856,221 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: November 8, 2017

Respectfully submitted,

/s/ Stamatios Stamoulis _____

STAMATIOU STAMOULIS

State Bar No.

STAMOULIS & WEINBLATT LLC

Two Fox Point Centre

6 Denny Rd.

Suite 307

Wilmington, DE 19809

(302) 999-1540

stamoulis@swdelaw.com

ATTORNEYS FOR PLAINTIFF