

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

ROTHSCHILD PATENT IMAGING LLC,	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
UNITED TECHNOLOGIES	§	
CORPORATION	§	
	§	
Defendant.	§	
	§	

COMPLAINT

Plaintiff Rothschild Patent Imaging LLC (“Plaintiff” or “RPI”) files this original Complaint against United Technologies Corporation (“Defendant” or “UTC”) for infringement of United States Patent No. 8,437,797 (“the ‘797 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 having an office with an address at 1400 Preston Rd., Suite 400, Plano, TX 75093.

4. On information and belief, Defendant is a Delaware corporation, with its principal place of business at 10 Farm Springs Rd., Farmington, CT 06032.

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 in this District 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 8,437,797)

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 '797 Patent with sole rights to enforce the '797 Patent and sue infringers.

11. A copy of the '797 Patent, titled "Wireless Image Distribution System and Method," is attached hereto as Exhibit A.

12. The '797 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Upon information and belief, Defendant has infringed and continues to infringe one or more claims (at least by having its employees, or someone under Defendant's control, test the System), including at least claim 6, of the '797 Patent by making, using, importing, selling, and/or offering for wireless security cameras covered by at least Claim 6 of the '797 Patent.

14. On information and belief, Defendant sells, offers to sell, and/or uses wireless

security cameras, including, without limitation, truVision video surveillance cameras such as the 1080p Wi-Fi Bullet IR Camera, truVision applications such as the truVision Device Locatator, truVision Device Manager, truVision TVRmobile app, and any similar devices and apps (“Product”), which infringe at least Claim 6 of the ‘797 Patent.

15. Regarding Claim 6, the Product is an image capturing mobile device (e.g., a wireless camera), which includes a wireless receiver (e.g., a Wi-Fi receiver) and a wireless transmitter (e.g., a Wi-Fi transmitter). Certain limitations of the foregoing element are illustrated in the screenshots below.

Video Surveillance

The truVision logo consists of a stylized icon of a camera or sensor followed by the text "truVision" in a lowercase, sans-serif font.

1080p IP Wi-Fi®
Bullet IR Camera



<http://static.interlogix.com/library/gsp-2243-tvb-8101-data-sheet-web.pdf>

OVERVIEW

The TruVision® IP Wi-Fi Bullet IR camera by Interlogix brings high-definition 1080p images to the commercial security segment at a low-cost. It is designed for use with TruVision Navigator and TruVision recorders.

The Wi-Fi spec is based on the Wi-Fi Standards of IEEE 802.11 b/g/n and operates in the 2.4 GHz range. Transmission rates of up to 160Mbps are supported, and wireless security is achieved via 64/128-bit WEP, WPA/WPA2, WPA-PSK/WPA2-PSK, and WPS wireless encryption standards.

The Wi-Fi Bullet IR camera also adheres to ONVIF Profile S open communications standards as well as support CGI command set for simple integration into standard IP systems.

- 1080p resolution
- H.264 compression technology with dual-streaming capability accommodates multiple settings
- Compatible with TruVision Navigator and TruVision recorders

Video Enhancement

- DWDR and/or real-time video streaming up to 1080p resolution to capture fine details
- True day/night functionality and infrared illuminator for capturing images in various lighting scenarios
- Up to 66 ft. (20m) IR range – with on/off settings

Recorded Clips

- Recorded clips stored onboard using a micro SD/SDXC card (up to 128GB)

Wireless (Wi-Fi)

- Supports IEEE 802.11b/g/n Wi-Fi standards
- Frequency range 2.4GHz
- Encryption security support for 64/128-bit WEP, WPA/WPA2, WPA-PSK/WPA2-PSK and WPS wireless encryption standards

<http://static.interlogix.com/library/gsp-2243-tvb-8101-data-sheet-web.pdf>

This is the user manual for the following TruVision® IP camera models:

1080p IP Wi-Fi Desktop IR camera (2 MP):

- RS-3230/3231
- TVQ-8101

1080p IP Wi-Fi Bullet IR camera (2 MP):

- RS-3250/3251
- TVB-8101

<http://static.interlogix.com/library/1073279-a-truvision-81-series-ip-camera-configuration-manual-en1.pdf>



<http://static.interlogix.com/library/1073279-a-truvision-81-series-ip-camera-configuration-manual-en1.pdf>

1.	Live view tab	Click to view live video.
2.	Playback tab	Click to play back video.
3.	Snapshot tab	Click to search for snapshots.
4.	Configuration tab	Click to display the configuration window for setting up the camera.
5.	Viewer	View live video. Time, date, and camera name are displayed here.
6.	Current user	Displays current user logged on.
7.	Logout	Click to log out from the system. This can be done at any time.
8.	Aspect ratio	Click this drop-down list to select an aspect ratio (4:3, 16:9, Original, or Auto) and adjust the layout of the live view.
9.	Stream type	Click this drop-down list to select main stream or sub stream.
10.	Plug-in switch	Click this drop-down list to select the plug-in. For IE users, web components and QuickTime are selectable. For non-IE users, web components, QuickTime, VLC, or MJPEG are selectable if they are supported by the web browser.
11.	Bi-directional audio	Turn the microphone on or off.
12.	Start/stop live view	Click to start/stop live view.
13.	Snapshot	Click to take a snapshot of the video. The snapshot will be saved to the default folder in JPEG or BMP format.
14.	Start/stop recording	Click to record live video.
15.	Digital zoom	Click to enable digital zoom.
16.	Audio	Adjust the volume.
17.	PTZ controls	Direction actions, zoom, focus, iris, light, and wiper control.

<http://static.interlogix.com/library/1073279-a-truvision-81-series-ip-camera-configuration-manual-en1.pdf>

17. The processor is configured to receive a plurality of photographic images. For example, the Product has an image sensor and processor that records videos, in which each frame of the video is a photographic image.

18. The processor filters the images using a transfer criterion. For example, a user may tap a snapshot icon displayed on the truVision TVRmobile app in communication with the camera in order to indicate video frames for saving and transmitting. The processor filters the frames of the video to save and transmit the images according to the transfer criteria (e.g., the user's selection of frames).

19. The processor, in conjunction with the wireless transmitter, sends the filtered images (e.g., the snapshot images selected by the user) to a second mobile device (e.g., a smartphone, tablet, etc. having the requisite app).

20. The processor, in conjunction with the wireless receiver, receives the transfer criteria (e.g., the user's selection of snapshot images) from the second mobile device.

21. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

22. Defendant's actions complained of herein are 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.

23. 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 receive notice of the order from further infringement of United States Patent No. 8,437,797 (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 13, 2017

Respectfully submitted,

/s/ Stamatios Stamoulis _____

STAMATIOStAMOULIS

State Bar No.

STAMOULIS & WEINBLATT LLC

Two Fox Point Centre

6 Denny Rd.

Suite 307

Wilmington, DE 19809

(302) 999-1540

stamoulis@swdelaw.com

JAY JOHNSON

State Bar No. 24067322

D. BRADLEY KIZZIA

State Bar No. 11547550

KIZZIA JOHNSON, PLLC

1910 Pacific Ave., Suite 13000

Dallas, Texas 75201

(214) 451-0164

Fax: (214) 451-0165

jay@kpllc.com

bkizzia@kpllc.com

ATTORNEYS FOR PLAINTIFF