

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROTHSCHILD PATENT IMAGING, LLC, §	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
HORIZON HOBBY, LLC	§	
	§	
Defendant.	§	
_____	§	

COMPLAINT

Plaintiff Rothschild Patent Imaging, LLC (“Plaintiff” or “RPI”) files this original Complaint against Horizon Hobby, LLC (“Defendant” or “Horizon”) for infringement of United States Patent No. 8,437,797 (“the ’797 Patent”) and United States Patent No. 8,204,437 (“the ’437 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 limited liability company, with its principal place of business at 4105 Fieldstone, Champaign, IL 61822.
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 because acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District. For instance, Defendant has a regular and established place of business at 200 W Adams St., Ste 2850 Chicago, IL 60606.

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 accused product), including at least Claims 6 and 7 of the '797 Patent by making, using, importing, selling, and/or offering for wireless drone cameras covered by at least Claims 6 and 7 of the '797 Patent.

14. On information and belief, Defendant sells, offers to sell, and/or uses wireless drone cameras, including, without limitation, the Glimpse FPV RTF drone and Glimpse app, and any similar devices ("Product"), which infringe at least Claims 6 and 7 of the '797 Patent.

15. Regarding Claim 6, the Product is an image-capturing mobile device (e.g., a drone with a camera attachment), which includes a wireless receiver (e.g., a Wi-Fi receiver) and a wireless transmitter (e.g., a Wi-Fi transmitter). On information and belief, the Product receives instructions from a user's smartphone via Wi-Fi by utilizing a wireless receiver present on the Product and sends captured images to a user's smartphone via Wi-Fi by utilizing a wireless transmitter found on the Product. Certain limitations of the foregoing element are illustrated in the screenshots below.

Glimpse FPV RTF (BLH2200)

BLADE

★★★★☆ (11 reviews) Write a review



<https://www.horizonhobby.com/drone/ready-to-fly-15086--1/glimpse-rtf-blh2200>

Integrated Camera

The built-in camera shoots true 720p HD video, can take 1.0 megapixel photos and store them on the included Micro SD card. Access is also available via the micro USB port. The adjustable camera lens pivots for a variety of vantage points.



<http://www.bladehelis.com/Glimpse/>

Team View

Fun for more than just the pilot, Team View allows the Glimpse drone downlink to stream FPV video on multiple iOS and Android smartdevices. Get the free Glimpse app at Google Play or iTunes stores and enjoy the view.



First-Person View

Your smart-device gives you access to the hottest trend in RC. The Glimpse drone allows you to stream live 480p video via 5.8GHz Wi-Fi downlink. We've even included a universal bracket that makes it easy to attach your smart-device to the transmitter.



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Key Features

- Fully assembled, no building necessary
- SAFE[®] technology makes learning to fly a drone easy
- Acclaimed reliability of Spektrum™ DSMX[®] 2.4GHz technology
- Integrated HD camera (installed)
- High-definition 1280 x 720p video and 1.0MP photo capability
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- High-contrast trim scheme helps maintain orientation
- Potent motor system offers great performance with low noise
- Replacement rotor blades (included) keep you flying
- 500mAh 1S Li-Po flight battery and USB charger (included)
- Enjoy 6–8 minute flight times indoors or outdoors
- Includes a compact multifunction 2.4GHz transmitter with Spektrum™ DSMX[®] technology
- Camera operates on the 5.8GHz band

Needed To Complete

- Everything you need to fly is included in one box.
- Live video streaming requires a compatible iOS and/or Android smart-device and the free Glimpse app available from iTunes or Google Play.

<https://www.horizonhobby.com/drone/ready-to-fly-15086--1/glimpse-rtf-blh2200>



This App is designed for Glimpse use:

Realise FPV with smart phone

Super far range WiFi link

720p HD video recording

Remote control of photo/video

Real-time microSD space shown

Preview of photo/video

WiFi password:12345678

<https://play.google.com/store/apps/details?id=com.yuneec.d1fpv&hl=en>

Camera Control and App Function

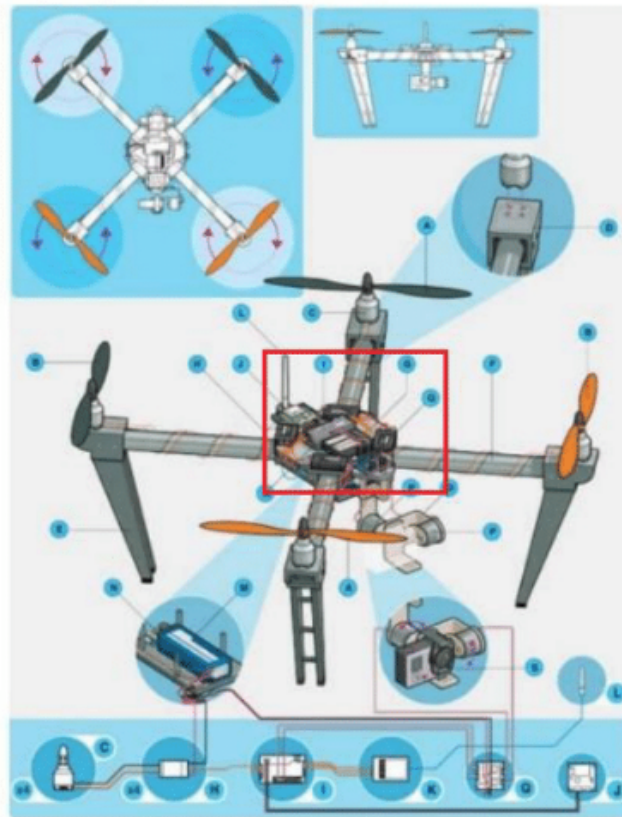
- Download and install the Glimpse app to your 5.8GHz Wi-Fi capable smartphone or tablet by searching for "Glimpse" at the Apple App Store for your iOS device or at Google Play for your Android device.
- Power on your transmitter and the Glimpse.
- Open the Wi-Fi settings on your smartphone or tablet and connect to the Glimpse network (Glimpse_#####) using the password "12345678".
- Open the Glimpse App on your smartphone or tablet.
- Place your smartphone in the transmitter holder as shown.
- Use the onscreen controls as shown on the following page to take photos and video.

<https://www.horizonhobby.com/pdf/BLH2200-manual-EN.pdf>

16. The Product includes a processor connected to the wireless receiver and transmitter. For example, the Product must have a processor connected to a Wi-Fi module in order to capture and send images to a user's smartphone. Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other

elements discussed herein.

Drone Parts And Components – Quick Overview



<https://www.dronezon.com/learn-about-drones-quadcopters/drone-components-parts-overview-with-tips/>

F. Boom

Shorter booms increase maneuverability, while longer booms increase stability. Booms must be tough to hold up in a crash while interfering with prop downdraft as little as possible. In many drones the boom is part of the main body. Other drone have a definite boom as a separate part. The Parrot AR 2.0 has the central cross boom.

Tip: Examine and insure that the boom has not become bent as this would effect the flying capabilities.

G. Main Drone Body Part

This is the central hub from which booms radiate like spokes on a wheel. It houses battery, main boards, processors avionics, cameras, and sensors.

Tip: Most drones are not waterproof so it is vital that the internal components of the main body do not get wet. A hard landing may not break the body of the drone but the shock could damage the internal drone components in the main body.

<https://www.dronezon.com/learn-about-drones-quadcopters/drone-components-parts-overview-with-tips/>

17. The processor is configured to receive a plurality of photographic images. For example, the Product's camera assembly is able to capture digital images, record video, and capture still image frames from video. Certain aspects of this element are illustrated in the screen

shots below, and/or the screen shots provided in connection with other elements discussed herein.

Integrated Camera

The built-in camera shoots true 720p HD video, can take 1.0 megapixel photos and store them on the included Micro SD card. Access is also available via the micro USB port. The adjustable camera lens pivots for a variety of vantage points.



<http://www.bladehelis.com/Glimpse/>

Team View

Fun for more than just the pilot, Team View allows the Glimpse drone downlink to stream FPV video on multiple iOS and Android smartdevices. Get the free Glimpse app at Google Play or iTunes stores and enjoy the view.



First-Person View

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<http://www.bladehelis.com/Glimpse/>



This App is designed for Glimpse use:

Realise FPV with smart phone

Super far range WiFi link

720p HD video recording

Remote control of photo/video

Real-time microSD space shown

Preview of photo/video

WiFi password:12345678

<https://play.google.com/store/apps/details?id=com.yuneeec.d1fpv&hl=en>

18. The processor filters the images using a transfer criterion. For example, the Product filters the plurality of photographic images (e.g., image frames captured by the Product's camera assembly during a livestream feed) using a transfer criterion (e.g., a user can select to capture particular image frames as stills/snapshots using the Glimpse app on a smartphone). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.



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<https://play.google.com/store/apps/details?id=com.yuneeec.d1fpv&hl=en>

App Controls

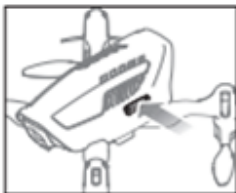


Retrieving Your Photos and Video

The Glimpse quadcopter comes with a micro SD card installed. To retrieve your photos and video from the micro SD card, you may do either of the following:

Remove the micro SD card.

- Press and release the micro SD card to remove it from the quadcopter.
- Insert the micro SD card into the provided SD card adapter.
- Insert the SD card adapter into an SD capable device.



Connect a micro USB cable to the quadcopter.

- Insert a micro USB cable (not included) into the micro USB port located on the back of the quadcopter.



EN

16

<https://www.horizonhobby.com/pdf/BLH2200-manual-EN.pdf>

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 Glimpse app). For example, the Product transmits, via the wireless transmitter (e.g., the Product's Wi-Fi module) and to a second mobile device (e.g., a smartphone having the Glimpse app installed), the filtered plurality of photographic images (e.g., the snapshots/stills taken from all the image frames comprising a live stream). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.



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<https://play.google.com/store/apps/details?id=com.yuneeec.d1fpv&hl=en>

Camera Control and App Function

- Download and install the Glimpse app to your 5.8GHz Wi-Fi capable smartphone or tablet by searching for "Glimpse" at the Apple App Store for your iOS device or at Google Play for your Android device.
- Power on your transmitter and the Glimpse.
- Open the Wi-Fi settings on your smartphone or tablet and connect to the Glimpse network (Glimpse_#####) using the password "12345678".
- Open the Glimpse App on your smartphone or tablet.
- Place your smartphone in the transmitter holder as shown.
- Use the onscreen controls as shown on the following page to take photos and video.

<https://www.horizonhobby.com/pdf/BLH2200-manual-EN.pdf>

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 (e.g., a smartphone with the Glimpse app installed). For example, the Product receives, via the wireless receiver (e.g., the Product's Wi-Fi module) and from the second mobile device (e.g., a smartphone with the Glimpse app installed), the transfer criteria (e.g., a user will select stills/snapshots to be taken, from the image frames making up the entirety of a live stream, from a smartphone with the Glimpse app).

21. Regarding Claim 7, the transmitting is conditioned upon the image-capturing mobile device and the second mobile device meeting a pre-defined pairing criterion. For example, image transmission is conditioned upon the image-capturing mobile device (e.g., the Product's camera) and the second mobile device (e.g., a smartphone with the Glimpse app installed) meeting a pre-defined pairing criterion (e.g., both devices are connected over the same Wi-Fi network). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

Glimpse FPV RTF (BLH2200)

BLADE

★★★★☆ (11 reviews) Write a review



<https://www.horizonhobby.com/drone/ready-to-fly-15086--1/glimpse-rtf-blh2200>

Integrated Camera

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<http://www.bladehelis.com/Glimpse/>

Team View

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First-Person View

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<http://www.bladehelis.com/Glimpse/>

Key Features

- Fully assembled, no building necessary
- SAFE[®] technology makes learning to fly a drone easy
- Acclaimed reliability of Spektrum[™] DSMX[®] 2.4GHz technology
- Integrated HD camera (installed)
- High-definition 1280 x 720p video and 1.0MP photo capability
- Effective 80-foot (24m) live video downlink range
- Live FPV video via 480p Wi-Fi downlink to multiple smart-devices (not included)
- 8GB Micro SD memory card and SD adapter included to record your photos and videos
- Tough yet lightweight airframe with durable blade guards
- High-contrast trim scheme helps maintain orientation
- Potent motor system offers great performance with low noise
- Replacement rotor blades (included) keep you flying
- 500mAh 1S Li-Po flight battery and USB charger (included)
- Enjoy 6–8 minute flight times indoors or outdoors
- Includes a compact multifunction 2.4GHz transmitter with Spektrum[™] DSMX[®] technology
- Camera operates on the 5.8GHz band

Needed To Complete

- Everything you need to fly is included in one box.
- Live video streaming requires a compatible iOS and/or Android smart-device and the free Glimpse app available from iTunes or Google Play.

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Camera Control and App Function

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- Open the Glimpse App on your smartphone or tablet.
- Place your smartphone in the transmitter holder as shown.
- Use the onscreen controls as shown on the following page to take photos and video.

<https://www.horizonhobby.com/pdf/BLH2200-manual-EN.pdf>

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

23. 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.

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

COUNT II

(INFRINGEMENT OF UNITED STATES PATENT NO 8,204,437)

25. Plaintiff incorporates paragraphs 1-24 herein by reference.

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

27. Plaintiff is the owner by assignment of the '437 Patent with sole rights to enforce the '437 patent and sue infringers.

28. A copy of the '437 Patent, titled "Wireless Image Distribution System and Method," is attached hereto as Exhibit B.

29. The '437 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

30. On 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 accused product), including at least Claim 1 of the '437 Patent by making, using, importing, selling, and/or offering for wireless drone cameras covered by at least Claim 1 of the '437 Patent.

31. On information and belief, Defendant sells, offers to sell, and/or uses wireless drone cameras, including, without limitation, the Glimpse FPV RTF drone and Glimpse app, and any similar devices ("Product"), which infringe at least Claim 1 of the '437 Patent.

32. The Product is a system that can distribute at least one digital photographic image (e.g., a drone camera with the ability to transmit images to another device). Certain aspects of this

element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

Glimpse FPV RTF (BLH2200)

BLADE

★★★★☆ (11 reviews) Write a review



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Integrated Camera

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<http://www.bladehelis.com/Glimpse/>

33. The Product includes at least one capturing device (e.g., a drone with a camera

attachment) and at least one receiving device (e.g., a smartphone with the Glimpse app installed). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.


Team View

Fun for more than just the pilot, Team View allows the Glimpse drone downlink to stream FPV video on multiple IOS and Android smartdevices. Get the free Glimpse app at Google Play or iTunes stores and enjoy the view.



First-Person View

Your smart-device gives you access to the hottest trend in RC. The Glimpse drone allows you to stream live 480p video via 5.8GHz Wi-Fi downlink. We've even included a universal bracket that makes it easy to attach your smart-device to the transmitter.



<http://www.bladehelis.com/Glimpse/>

Key Features

- Fully assembled, no building necessary
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- Acclaimed reliability of Spektrum™ DSMX® 2.4GHz technology
- Integrated HD camera (installed)
- High-definition 1280 x 720p video and 1.0MP photo capability
- Effective 80-foot (24m) live video downlink range
- Live FPV video via 480p Wi-Fi downlink to multiple smart-devices (not included)
- 8GB Micro SD memory card and SD adapter included to record your photos and videos
- Tough yet lightweight airframe with durable blade guards
- High-contrast trim scheme helps maintain orientation
- Potent motor system offers great performance with low noise
- Replacement rotor blades (included) keep you flying
- 500mAh 1S Li-Po flight battery and USB charger (included)
- Enjoy 6–8 minute flight times indoors or outdoors
- Includes a compact multifunction 2.4GHz transmitter with Spektrum™ DSMX® technology
- Camera operates on the 5.8GHz band

Needed To Complete

- Everything you need to fly is included in one box.
- Live video streaming requires a compatible iOS and/or Android smart-device and the free Glimpse app available from iTunes or Google Play.

<https://www.horizonhobby.com/drone/ready-to-fly-15086--1/glimpse-rtf-blh2200>



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Remote control of photo/video

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Preview of photo/video

WiFi password:12345678

<https://play.google.com/store/apps/details?id=com.yuneeec.d1fpv&hl=en>

34. The capturing device and receiving device are cooperatively disposed in a communicative relation with one another via at least one wireless network. For example, the Product includes a capturing device (e.g., a drone with a camera attachment) and a receiving device (e.g., a smartphone with the Glimpse app) being cooperatively disposed in a communicative relation with one another via at least one wireless network (e.g., both the drone and a user's smartphone will be connected to the same Wi-Fi network allowing for image transfer and live streaming through the Wi-Fi network). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

Camera Control and App Function

- Download and install the Glimpse app to your 5.8GHz Wi-Fi capable smartphone or tablet by searching for "Glimpse" at the Apple App Store for your iOS device or at Google Play for your Android device.
- Power on your transmitter and the Glimpse.
- Open the Wi-Fi settings on your smartphone or tablet and connect to the Glimpse network (Glimpse_#####) using the password "12345678".
- Open the Glimpse App on your smartphone or tablet.
- Place your smartphone in the transmitter holder as shown.
- Use the onscreen controls as shown on the following page to take photos and video.

<https://www.horizonhobby.com/pdf/BLH2200-manual-EN.pdf>

35. The capturing device has a capture assembly that is structured to selectively capture the at least one digital photographic image. For example, the capturing device (e.g., a drone with a camera attachment) has a capture assembly (e.g., a camera assembly), and the capture assembly is structured to selectively capture the at least one digital photographic image (e.g., the Product's camera assembly is able to capture digital images, record video, and capture still image frames from video).

36. The capturing device also has a first network component (e.g., Wi-Fi module). The first network component is structured to communicate the at least one digital photographic image (e.g., images captured by the Product) to the receiving device (e.g., smartphone with Glimpse app) via the at least one wireless network (e.g., a Wi-Fi network). On information and belief, because the Product is communicating with a smartphone or other device over a Wi-Fi network, it must include a wireless NIC. Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

To connect to a network, a computer uses a network interface card (NIC). A NIC controls the wired and wireless connections of a computer to exchange information with other computers and the Internet.

Network Interface Cards

In the early days of computing, individual computers operated as stand-alone systems. The earliest personal computers did not have an easy way to connect to other computers. In order to transfer files between computers, you had to use a portable storage medium such as a **floppy disk**; however, in modern-day computers, connecting to a network is essential. For example, you need to connect to use e-mail, access information on the Internet, and share documents within a corporate network.

A computer uses a **network interface card** (NIC) to become part of a network. The NIC contains the electronic circuitry required to communicate using a wired connection (e.g., **Ethernet**) or a wireless connection (e.g., **WiFi**). A network interface card is also known as a network interface controller, network adapter, or **Local Area Network (LAN)** adapter.

<http://study.com/academy/lesson/network-interface-card-nic-types-function-definition.html>

37. The receiving device (e.g., smartphone with Glimpse app installed) has a second network component (e.g., Wi-Fi module within the smartphone). The second network component is structured to receive the at least one digital photographic image (e.g., images captured by the drone camera) from the capturing device via the wireless network (e.g., a Wi-Fi network).

38. The capturing device and the receiving device are disposed in a selectively paired relationship with one another. For example, the capturing device (e.g., a drone with a camera attachment) and the receiving device (e.g., a smartphone with the Glimpse app installed) are disposed in a selectively paired relationship with one another (e.g., both devices are connected through the same Wi-Fi network).

39. The selectively paired relationship is at least partially based on the capturing device and the receiving device being cooperatively associated with at least one common pre-defined pairing criterion. For example, both devices are connected over the same Wi-Fi network and are within the effective signal range of the Wi-Fi network.

40. The pre-defined pairing criterion is a geographic location of the capturing device.

For example, the Product must be located at a geographic location within the signal range of the Wi-Fi network utilized by a user's smartphone in order to pair with said smartphone). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

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WiFi password:12345678

<https://play.google.com/store/apps/details?id=com.yunec.d1fpv&hl=en>

Camera Control and App Function

- Download and install the Glimpse app to your 5.8GHz Wi-Fi capable smartphone or tablet by searching for "Glimpse" at the Apple App Store for your iOS device or at Google Play for your Android device.
- Power on your transmitter and the Glimpse.
- Open the Wi-Fi settings on your smartphone or tablet and connect to the Glimpse network (Glimpse_#####) using the password "12345678".
- Open the Glimpse App on your smartphone or tablet.
- Place your smartphone in the transmitter holder as shown.
- Use the onscreen controls as shown on the following page to take photos and video.

<https://www.horizonhobby.com/pdf/BLH2200-manual-EN.pdf>

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

42. 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.

43. 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 Nos. 8,437,797, and 8,204,437 (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: January 30, 2018

Respectfully submitted,

/s/ Kenneth Matuszewski

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