IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

CODEC TECHNOLOGIES LLC,
 	
    Plaintiff,
 	
    v.
 	
MATTEL, INC.,
 	
    Defendant.
	CIVIL ACTION NO 5:18-cv-16
	
	JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

1.   This is an action for patent infringement in which Codec Technologies LLC makes the following allegations against Mattel, Inc.

PARTIES

2.   Plaintiff Codec Technologies LLC ("Plaintiff" or "Codec Technologies") is a Texas limited liability company with its principal place of business at 903 E. 18th Street, Suite 224, Plano, Texas 75074.

3.   On information and belief, Mattel, Inc. ("Defendant") is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 333 Continental Blvd, MS: 1518, El Segundo, CA 90245.

JURISDICTION AND VENUE

4.   This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5.   Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b). On information and belief, acts of infringement have been committed in this District. Additionally, Defendant has a regular and established place of business in this District, including, without limitation, its distribution center located at 8702 Killam Industrial Blvd, Laredo, TX 78045.

6.   On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this Judicial District.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 6,825,780

7.   Plaintiff is the owner of United States Patent No. 6,825,780 ("the '780 patent") entitled "Multiple codec-imager system and method." The '780 Patent issued on November 30, 2004. A true and correct copy of the '780 Patent is attached as Exhibit A.

8.   Defendant owns, uses, operates, advertises, controls, sells, and otherwise provides products and/or services that infringe the '780 patent. The '780 patent provides, among other things, "[a] system and method are provided for compressing data utilizing multiple encoders on a single integrated circuit. Initially, data is received in a single integrated circuit. The data is then encoded utilizing a plurality of encoders incorporated on the single integrated circuit. Another single module system and method are provided for compressing data. In use, photons are received utilizing a single module. Thereafter, compressed data representative of the photons is outputted utilizing the single module."

9.   Defendant directly and/or through intermediaries, made, has made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or services that infringed one or more claims of the '780 patent, including at least Claim 9, in this district and elsewhere in the United States. By making, using, importing, offering for sale, and/or selling such products and services, and all like products and services, Defendant has injured Plaintiff and is thus liable for infringement of the '780 patent pursuant to 35 U.S.C. § 271.

10.   Claim 9 reads, "[a] single integrated circuit for compressing data, comprising: a first encoder embodied on the single integrated circuit including circuitry for electronically encoding a first Set of data; and a second encoder embodied on the same single integrated circuit as the first encoder for electronically encoding a second set of data; wherein the data is compressed utilizing the encoders."

11.   Based on present information and belief, by way of an illustrative example, the the Nabi Big Tab, uses a Tegra 4 System on a Chip. ("Tegra 4")

TECH SPECS

Display:
- 19.5-Inch
- 10 Point Multi-Touch Display
- Wide Viewing Angle
- 1600 x 900 HD+ Resolution

Processor:
- NVIDIA® Tegra® 4 Quad-Core 1.6GHz with burst speed to 1.8GHz

Storage:
- 16GB

Memory:
- 2GB RAM

Camera:
- 1.3 MP Front Facing Camera
- 720p Video

Battery:
- Battery 30 minute backup for portability*
- 1650 mAh, Rechargeable Lithium-ion

OS:
- Android 4.4, KitKat
- Blue Morpho™ OS Overlay

Network:
- Wi-Fi 802.11 b/g/n Dual Band
- Bluetooth 4.0
- NFC

Audio & Video Format:
- Audio: MP3, AAC, WMA
- Video: MPEG-4, H.263, H.264, WMV

Input/Output:
- nabi Connector
- 3.5 mm Standard Audio Jack
- Built-In Microphone

https://www.nabitablet.com/nabi-big-tab-hd20/specs

12.   Based on present information and belief, the Tegra 4 has multiple encoders capable of encoding at least video data, e.g., H.264, MPEG 4, and VP8.

Appendix B: Tegra 4 / 4i Supported Video and Audio Formats

Video	
Decode	**H.264 HP/MP/BP** 4k x 2k 62.5Mbps @ 24p,1440p 62.5Mbps @ 30p;1080p 62.5Mbps @ 60p; **VC1 AP/MP/SP** 1080p 40Mbps @ 60i/30p; **MPEG4 SP** 1080p 10Mbps @ 30 fps; **WebM VP8** 1080p 60Mbps @ 60p, 1440p 60Mbps @ 30p; **MPEG-2 MP** 1080p 80Mbps @ 60i/60p
Encode	**H.264 (BP/MP/HP)** 1080p 50Mbps @ 60p, 1440p 50Mbps @ 30p; **MPEG4 SP** D1 1Mbps 30p; **VP8** 1080p 20Mbps @ 60p, 1440p 50 Mbps @ 30 fps
Audio	
Decode	AAC, AAC-LC, AAC+, eAAC+, MP3, WAV/PCM, AMR-NB, AMR-WB, BSAC, MPEG-2 Audio, Ogg Vorbis, WMA 10, WMA Lossless, WMA Pro LBR 10, MPEG-2, AC3
Encode	AAC LC, AMR-NB, AMR-WB

http://www.nvidia.com/docs/IO//116757/Tegra_4_GPU_Whitepaper_FINALv2.pdf

13.   Based on present information and belief, the Tegra 4 has multiple encoders capable of encoding at least audio data, e.g., AAC LC, AMR-NB, and AMR-WB.

Appendix B: Tegra 4 / 4i Supported Video and Audio Formats

Video	
Decode	**H.264 HP/MP/BP** 4k x 2k 62.5Mbps @ 24p,1440p 62.5Mbps @ 30p;1080p 62.5Mbps @ 60p; **VC1 AP/MP/SP** 1080p 40Mbps @ 60i/30p; **MPEG4 SP** 1080p 10Mbps @ 30 fps; **WebM VP8** 1080p 60Mbps @ 60p, 1440p 60Mbps @ 30p; **MPEG-2 MP** 1080p 80Mbps @ 60i/60p
Encode	**H.264 (BP/MP/HP)**1080p 50Mbps @ 60p, 1440p 50Mbps @ 30p; **MPEG4 SP** D1 1Mbps 30p; **VP8** 1080p 20Mbps @ 60p, 1440p 50 Mbps @ 30 fps
Audio	
Decode	AAC, AAC-LC, AAC+, eAAC+, MP3, WAV/PCM, AMR-NB, AMR-WB, BSAC, MPEG-2 Audio, Ogg Vorbis, WMA 10, WMA Lossless, WMA Pro LBR 10, MPEG-2, AC3
Encode	AAC LC, AMR-NB, AMR-WB

http://www.nvidia.com/docs/IO//116757/Tegra_4_GPU_Whitepaper_FINALv2.pdf

14.   Based on information and belief, the Tegra 4 comprises an integrated circuit that employs the video HW codecs for video data and audio HW codecs for audio data. The data is necessarily compressed through the respective encoders.

15.   Based on present information and belief, Defendant directly and/or through intermediaries, made, has made, used, imported, provided, supplied, distributed, sold, and/or offered for sale other infringing devices, including but not limited to, other Nabi Tablets and related devices. In the alternative, because the manner of use by Defendant differs in no substantial way from the language of the claims, if Defendant is not found to literally infringe, Defendant infringes under the doctrine of equivalents.

16.   Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

17.   Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of the Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

1.   A judgment in favor of Plaintiff that Defendant has infringed the '780 Patent;

2.   A judgment and order requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '780 Patent as provided under 35 U.S.C. § 284;

3.   An award to Plaintiff for enhanced damages resulting from the knowing, deliberate, and willful nature of Defendant's prohibited conduct with notice being made at least as early as the date of the filing of this Complaint, as provided under 35 U.S.C. § 284;

4.   A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees; and

5.   Any and all other relief to which Plaintiff may show itself to be entitled.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Respectfully Submitted,

CODEC TECHNOLOGIES LLC

/s/ Papool S. Chaudhari

Dated: February 5, 2018   By: _____

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