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*Attorneys for Plaintiff*  
*Secure Cam, LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

Secure Cam, LLC, a Wyoming Limited Liability Company ) Case No. \_\_\_\_\_

Plaintiff,

v.

Anviz Global, Inc., a California corporation,

Defendant.

**COMPLAINT FOR  
INFRINGEMENT OF  
U.S. PATENT NO. 8,531,555  
U.S. PATENT NO. 8,350,928  
U.S. PATENT NO. 8,836,819  
U.S. PATENT NO. 9,363,408**

**DEMAND FOR JURY TRIAL**

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**COMPLAINT FOR PATENT INFRINGEMENT**

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2 Plaintiff Secure Cam, LLC, ("Secure Cam" or "Plaintiff"), by and through its  
3 undersigned counsel, for its Complaint against Defendant Anviz Global, Inc. ("Anviz"  
4 or "Defendant") makes the following allegations. These allegations are made upon  
5 information and belief.

6  
7 **NATURE OF THE ACTION**

8 1. This is an action against Defendant for infringement of one or more  
9 claims of United States Patent No. 8,531,555 (“the ‘555 Patent”), United States Patent  
10 No. 8,350,928 (“the ‘928 Patent”), United States Patent No. 8,836,819 (“the ‘819  
11 Patent), and United States Patent No. 9,363,408 (“the ‘408 Patent).

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13 **PARTIES**

14 2. Plaintiff Secure Cam is a limited liability company organized under the  
15 laws of the State of Wyoming and has an office and principal place of business at 30  
16 N Gould St. STE R, Sheridan, WY 82801.

17 3. Defendant Anviz Global, Inc., is a corporation incorporated under the  
18 laws of California, which has an office and principal place of business at 1130  
19 Cadillac Court, Milpitas, CA 95035.

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21 **JURISDICTION AND VENUE**

22 4. This action arises under the patent laws of the United States, including 35  
23 U.S.C. §§ 271 et seq., 281, and 284.

24 5. This Court has subject matter jurisdiction over this action pursuant to 28  
25 U.S.C. §§ 1331 and 1338(a) because it arises under United States Patent law.

26 6. This Court has personal jurisdiction over the Defendant because, *inter*  
27 *alia*, it resides in the State of California; regularly conducts business in the State of  
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1 California; and continues to commit acts of patent infringement in the State of  
2 California including by making, using, offering to sell, and/or selling Accused  
3 Products within the State of California and this district.

4 7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c)  
5 and 1400(b). Defendant is subject to this Court’s personal jurisdiction because, *inter*  
6 *alia*, Defendant has committed and continues to commit acts of patent infringement  
7 including making, using, offering to sell, and/or selling Accused Products in this  
8 district, and/or importing Accused Products into this district; Defendant has a  
9 principal place of business in this judicial district, and Defendant employs personnel  
10 in this judicial district.

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12 **FACTS**

13 8. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,531,555 (“the  
14 ‘555 Patent”), entitled “Method and Apparatus for Automatically Categorizing Images  
15 in a Digital Camera,” which was duly and legally issued on September 10<sup>th</sup>, 2013 by  
16 the United States Patent and Trademark Office (“USPTO”).

17 9. A copy of the ‘555 Patent is attached to this Complaint as **Exhibit A**.

18 10. The claims of the ‘555 Patent are valid and enforceable.

19 11. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,350,928 (“the  
20 ‘928 Patent”), entitled “Method and Apparatus for Automatically Categorizing Images  
21 in a Digital Camera,” which was duly and legally issued on January 8<sup>th</sup>, 2013 by the  
22 United States Patent and Trademark Office (“USPTO”).

23 12. A copy of the ‘928 Patent is attached to this Complaint as **Exhibit B**.

24 13. The claims of the ‘928 Patent are valid and enforceable.

25 14. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,836,819 (“the  
26 ‘819 Patent”), entitled “Method and Apparatus for Automatically Categorizing Images  
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1 in a Digital Camera,” which was duly and legally issued on September 16<sup>th</sup>, 2014 by  
2 the United States Patent and Trademark Office (“USPTO”).

3 15. A copy of the ‘819 Patent is attached to this Complaint as **Exhibit C**.

4 16. The claims of the ‘819 Patent are valid and enforceable.

5 17. Plaintiff is the owner, by assignment, of U.S. Patent No. 9,363,408 (“the  
6 ‘408 Patent”), entitled “Method and Apparatus for Automatically Categorizing Images  
7 in a Digital Camera,” which was duly and legally issued on June 7<sup>th</sup>, 2016 by the  
8 United States Patent and Trademark Office (“USPTO”).

9 18. A copy of the ‘408 Patent is attached to this Complaint as **Exhibit D**.

10 19. The claims of the ‘408 Patent are valid and enforceable.

11  
12 **COUNT I: CLAIM FOR PATENT INFRINGEMENT**

13 **UNDER 35 U.S.C. § 271(a) (‘555 PATENT)**

14 20. Plaintiff hereby incorporates by reference the allegations of paragraphs 1  
15 through 19 of this Complaint as if fully set forth herein.

16 21. Claim 1 of the ‘555 Patent covers “a device, comprising a processing  
17 circuit configured to automatically generate at least one tag for an image captured  
18 using the device in response to analyzing data associated with the image at a time of  
19 image capture, and a memory circuit configured to store the at least one tag with the  
20 data to thereby categorize the image.”

21 22. Defendant manufactures, imports into the United States, offers for sale,  
22 and/or sells face recognition readers, which infringe at least Claim 1 of the ‘555 Patent  
23 (hereafter “Accused Product(s)").

24 23. Defendant’s Accused Product(s) include, without limitation FacePass Pro  
25 Standalone Facial Recognition System.

26 24. A claim chart comparing Claim 1 of the ‘555 Patent to the Accused  
27 Product(s) is attached as Exhibit E.

1           25. The Accused Product(s) includes a face recognition terminal that uses  
2 face recognition to document time and attendance of employees. See Exhibit E, p. 1.

3           26. The Accused Product(s) includes a high performance CPU and dual  
4 camera for capturing the face of users. See Exhibit E, p. 2.

5           27. The Accused Product(s) includes a face recognition terminal that  
6 captures the face of the person standing in front of the camera and compares it to  
7 stored faces to identify the person instantly. See Exhibit E, p. 2.

8           28. The Accused Product(s) includes memory that stores up to 500 user faces  
9 and 100,000 records in on-board memory. See Exhibit E, p. 3.

10           29. Each one of the elements included in the Infringing System, itemized in  
11 paragraphs 25 – 28 above, is an element in Claim 1 of the ‘555 Patent.

12           30. Plaintiff has been, and will continue to be, irreparably harmed by  
13 Defendant’s ongoing infringement of the ‘555 Patent.

14           31. As a direct and proximate result of Defendant’s infringement of the ‘555  
15 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be  
16 determined.

17                           **COUNT II: CLAIM FOR PATENT INFRINGEMENT**

18                                   **UNDER 35 U.S.C. § 271(a) (‘928 PATENT)**

19           32. Plaintiff hereby incorporates by reference the allegations of paragraphs 1  
20 through 19 of this Complaint as if fully set forth herein.

21           33. Claim 1 of the ‘928 Patent covers “a digital camera for automatically  
22 categorizing captured image data, the digital camera comprising a processor within the  
23 digital camera for capturing image data, an analysis module within the digital camera  
24 coupled to the processor and configured to perform image data analysis on the  
25 captured image data at the time of image capture by the digital camera and to  
26 automatically generate, responsive to the preformed image data analysis, a category  
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1 tag for the captured image data; and a memory for storing the generated category tag  
2 in association with the captured image data for categorizing the captured image data.”

3 34. Defendant manufactures, imports into the United States, offers for sale,  
4 and/or sells face recognition readers, which infringe at least Claim 1 of the ‘928 Patent  
5 (hereafter “Accused Product(s)”).

6 35. Defendant’s Accused Product(s) include, without limitation FacePass Pro  
7 Standalone Recognition System.

8 36. A claim chart comparing Claim 1 of the ‘928 Patent to the Accused  
9 Product(s) is attached as Exhibit F.

10 37. The Accused Product(s) includes a face recognition terminal that uses  
11 face recognition to document time and attendance of employees. See Exhibit F, p. 1.

12 38. The Accused Product(s) includes a face recognition terminal that  
13 includes a high performance CPU and dual camera for capturing the face of users. See  
14 Exhibit F, p. 2.

15 39. The Accused Product(s) includes a BioNANO core algorithm for  
16 analyzing the facial features of the user, comparing the captured image of the face of  
17 the person standing in front of the camera to stored faces to identify the person  
18 instantly. See Exhibit F, p. 2.

19 40. The Accused Product(s) includes on-board memory that stores up to 500  
20 user faces and 100,000 records. See Exhibit F, p. 3.

21 41. Each one of the elements included in the Infringing System, itemized in  
22 paragraphs 36 – 40 above, is an element in Claim 1 of the ‘928 Patent.

23 42. Plaintiff has been, and will continue to be, irreparably harmed by  
24 Defendant’s ongoing infringement of the ‘928 Patent.

25 43. As a direct and proximate result of Defendant’s infringement of the ‘928  
26 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be  
27 determined.

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**COUNT III: CLAIM FOR PATENT INFRINGEMENT**

**UNDER 35 U.S.C. § 271(a) ('819 PATENT)**

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3 44. Plaintiff hereby incorporates by reference the allegations of paragraphs 1  
4 through 19 of this Complaint as if fully set forth herein.

5 45. Claim 1 of the '819 Patent covers "An apparatus comprising a processing  
6 device configured to detect a predetermined characteristic in an image file in response  
7 to capturing an image, automatically generate at least one category tag for the image  
8 file at a time of capturing the image based at least in part on the predetermined  
9 characteristic, attach the at least one category tag to the image file; and a memory  
10 device configured to store the image file with the attached at least one category tag."

11 46. Defendant manufactures, imports into the United States, offers for sale,  
12 and/or sells face recognition readers, which infringe at least Claim 1 of the '819 Patent  
13 (hereafter "Accused Product(s)").

14 47. Defendant's Accused Product(s) include, without limitation FacePass Pro  
15 Standalone Facial Recognition System.

16 48. A claim chart comparing Claim 1 of the '819 Patent to the Accused  
17 Product(s) is attached as Exhibit G.

18 49. The Accused Product(s) includes a face recognition terminal that uses  
19 face recognition to document time and attendance of employees. See Exhibit G, p. 1.

20 50. The Accused Product(s) includes a high performance CPU and dual  
21 camera for capturing the face of users. See Exhibit G, p. 2.

22 51. The Accused Product(s) includes face recognition technology to capture  
23 the face of the person standing in front of the camera and compare it to stored faces to  
24 identify the person instantly. See Exhibit G, p. 3.

25 52. The Accused Product(s) includes on-board memory that stores up 500  
26 user faces and 100,000 records. See Exhibit G, p. 6.

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1           53. Each one of the elements included in the Infringing System, itemized in  
2 paragraphs 48 – 52 above, is an element in Claim 1 of the ‘819 Patent.

3           54. Plaintiff has been, and will continue to be, irreparably harmed by  
4 Defendant’s ongoing infringement of the ‘819 Patent.

5           55. As a direct and proximate result of Defendant’s infringement of the ‘819  
6 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be  
7 determined.

8                           **COUNT IV: CLAIM FOR PATENT INFRINGEMENT**

9                                   **UNDER 35 U.S.C. § 271(a) (‘408 PATENT)**

10           56. Plaintiff hereby incorporates by reference the allegations of paragraphs 1  
11 through 19 of this Complaint as if fully set forth herein.

12           57. Claim 1 of the ‘408 Patent covers “a method comprising automatically  
13 generating, using a first processing device, at least one image category tag based at  
14 least in part on the first processing device analyzing image data associated with an  
15 image at a time of image capture, storing, in a memory device, the at least one image  
16 category tag as part of an image file storing the image; and automatically determining,  
17 using the first processing device or a second processing device, a category for the  
18 image based at least in part on the at least one image category tag.”

19           58. Defendant manufactures, imports into the United States, offers for sale,  
20 and/or sells face recognition readers, which infringe at least Claim 1 of the ‘408 Patent  
21 (hereafter “Accused Product(s)").

22           59. Defendant’s Accused Product(s) include, without limitation FacePass Pro  
23 Standalone Facial Recognition System.

24           60. A claim chart comparing Claim 1 of the ‘408 Patent to the Accused  
25 Product(s) is attached as Exhibit H.

26           61. The Accused Product(s) includes a face recognition terminal that uses  
27 face recognition to document time and attendance of employees. See Exhibit H, p. 1.  
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1 62. The Accused Product(s) includes a face recognition terminal that  
2 includes a high performance CPU and dual camera for capturing the face of users. See  
3 Exhibit H, p. 2.

4 63. The Accused Product(s) includes face recognition technology that  
5 compares the captured image of the face of the person standing in front of the camera  
6 to stored faces to identify the person instantly. See Exhibit H, p. 2.

7 64. The Accused Product(s) includes on-board memory that stores up to 500  
8 user faces and 100,000 records in on-board memory. See Exhibit H, p. 3.

9 65. The Accused Product(s) includes a face recognition terminal that  
10 includes a high performance CPU and dual camera for capturing the face of users. See  
11 Exhibit H, p. 4.

12 66. Each one of the elements included in the Infringing System, itemized in  
13 paragraphs 61 – 65 above, is an element in Claim 1 of the ‘408 Patent.

14 67. Plaintiff has been, and will continue to be, irreparably harmed by  
15 Defendant’s ongoing infringement of the ‘408 Patent.

16 68. As a direct and proximate result of Defendant’s infringement of the ‘408  
17 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be  
18 determined.

19  
20 **PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff prays for relief against Defendant as follows:

22 A. In favor of Plaintiff that Defendant has infringed one or more claims of  
23 the ‘555 Patent, either literally or under the doctrine of equivalents;

24 B. Requiring Defendant to pay Plaintiff its damages, costs, expenses, and  
25 prejudgment and post-judgment interest for Defendant’s infringement of the ‘555  
26 Patent as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

27 C. For such other and further relief, as may be just and equitable.  
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1 D. Requiring Defendant to pay Plaintiff its damages, costs, expenses, and  
2 prejudgment and post-judgment interest for Defendant’s infringement of the ‘928  
3 Patent as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

4 E. For such other and further relief, as may be just and equitable.

5 F. Requiring Defendant to pay Plaintiff its damages, costs, expenses, and  
6 prejudgment and post-judgment interest for Defendant’s infringement of the ‘819  
7 Patent as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

8 G. For such other and further relief, as may be just and equitable.

9 H. Requiring Defendant to pay Plaintiff its damages, costs, expenses, and  
10 prejudgment and post-judgment interest for Defendant’s infringement of the ‘408  
11 Patent as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

12 I. For such other and further relief, as may be just and equitable.

13  
14 **DEMAND FOR TRIAL BY JURY**

15 Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby  
16 demands a jury trial on all issues and causes of action triable to a jury.

17  
18 Dated: April 21, 2018

Respectfully submitted,

19  
20 /s/Nicholas Ranallo  
21 Nicholas Ranallo, Attorney at Law  
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