

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SECURE CAM, LLC, a Wyoming
limited liability company,

Plaintiff,

v.

VTECH ELECTRONICS NORTH
AMERICA, LLC, an Illinois limited
liability company,

Defendant.

CIVIL ACTION NO. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Secure Cam, LLC (“Plaintiff”) brings this complaint against Vtech Electronics North America, LLC (“Defendant”). As its complaint against Defendant, Plaintiff alleges as follows:

NATURE OF THE ACTION

1. This is an action under 35 U.S.C. § 271 for infringement of United States Patent No. 7,257,158 (“the ‘158 Patent”).

THE PARTIES

2. Plaintiff Secure Cam, LLC, is a Wyoming limited liability company having a principal place of business at 30 N. Gould St. STE R, Sheridan, WY 82801.

3. Defendant Vtech Electronics North America, LLC is an Illinois limited liability company having a principal place of business at 1156 West Shure Drive, Suite 200, Arlington Heights, IL 60004.

JURISDICTION AND VENUE

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

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

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

FACTS

7. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,257,158 (“the ‘158 Patent”), entitled “System for Transmitting Video Images over a Computer Network to a Remote Receiver,” which was duly and legally issued on August 14th, 2007 by the United States Patent and Trademark Office (“USPTO”).

8. A copy of the ‘158 Patent is attached to this Complaint as Exhibit A.

9. The claims of the ‘158 Patent are valid and enforceable.

COUNT I: CLAIM FOR PATENT INFRINGEMENT

UNDER 35 U.S.C. § 271(a)

10. Plaintiffs hereby incorporates by reference the allegations of paragraphs 1 through 9 of this Complaint as if fully set forth herein.

11. Claim 12 of the ‘158 Patent covers “a system for transmitting a real-time video and remote control commands over a digital network, said system comprising a transmitter containing one or more digitized frames of said real-time video being transmitted, the digital network connected to said transmitter, and one or more remote receivers connected to said network for

receiving said video from said transmitter, wherein at least one of said receivers is configured to receive one or more control commands from a user, wherein said transmitter is configured to receive and interpret at least one of said control commands from said one of said receivers over said network, and wherein, upon interpretation of said control command, said transmitter dynamically changes the operation of said transmitter while said video is being transmitted, whereby said user can remotely control the operation of said transmitter in substantially real-time.”

12. Defendant manufactures, imports into the United States, offers for sale, and/or sells face recognition systems, which infringe at least Claim 12 of the ‘158 Patent (hereafter “Accused Product(s)”).

13. Defendant’s Accused Product(s) include, without limitation VM5271-2 Expandable Digital Video Baby Monitor, VM3251-2 Expandable Digital Video Baby Monitor, VM346 Bear Expandable Digital Video Baby Monitor, VM346-19 Bear Expandable Digital Video Baby Monitor with Automatic Night Vision, VM345 Owl Full Color Video Monitor, VM345-15 Owl Full Color Video Monitor, VM345-19 Owl Full Color Video Monitor, VM342-2 Owl 2 Camera Pan & Tilt Video Monitor, VM343-2 Video Baby Monitor with Two Cameras, VM341-2 Full Color Video Monitor, VM333 Video Baby Monitor, VM312-2 Video Baby Monitor, and VM311-13 Video Baby Monitor.

14. A claim chart comparing Claim 12 of the ‘158 Patent to the Accused Product(s) is attached as Exhibit B.

15. The Accused Product(s) includes a baby unit and two parent units. See Exhibit B, p. 1.

16. The Accused Product(s) includes a camera that captures real-time video data. See Exhibit B, p. 2.

17. The Accused Product(s) includes a digital network that communicates the baby unit and the parent units. See Exhibit B, p. 3.

18. The Accused Product(s) includes two parent units that receive video data from the camera over the wireless network. See Exhibit B, P. 4.

19. The Accused Product(s) includes, in the parent unit, buttons that allow the user of the parent unit to selectively, remotely, and digitally zoom the camera. See Exhibit B, P. 5.

20. The Accused Product(s) includes, in the baby unit, a transmitter that receives and interprets the command signal from the parent unit. See Exhibit B, p. 6.

21. On information and belief, the operation of the baby unit is changed when the zoom function is activated by enlarging the video area at the center of the frame and trimming away the outside edges of the video prior to transmission to the parent unit. See Exhibit B, p. 7.

22. The Accused Product(s) includes, in the parent unit, the ability for the user to remotely zoom in real-time. See Exhibit B, p. 8.

23. Each one of the elements included in the Infringing System, itemized in paragraphs 15-22 above, is an element in Claim 12 of the '158 Patent.

24. Plaintiff has been, and will continue to be, irreparably harmed by Defendant's ongoing infringement of the '158 Patent.

25. As a direct and proximate result of Defendant's infringement of the '158 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be determined.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief against Defendant as follows:

A. In favor of Plaintiff that Defendant has infringed one or more claims of the '158 Patent, either literally or under the doctrine of equivalents;

B. Requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '158 Patent as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

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

DEMAND FOR TRIAL BY JURY

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

Dated: May 11, 2018

Respectfully submitted

/s/

Isaac Rabicoff
Rabicoff Law LLC
73 W Monroe St
Chicago, Illinois 60603
(773) 669-4590
isaac@rabilaw.com

/s/ Todd Y. Brandt

Todd Y. Brandt (*Pro Hac Vice pending*)
State Bar No. 24027051
BRANDT LAW FIRM
222 N. Fredonia Street
Longview, Texas 75606
Telephone: (903) 212-3130
Facsimile: (903) 753-6761
tbrandt@thebrandtlawfirm.com

Attorneys for Plaintiff Secure Cam, LLC