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5 *Attorneys for Plaintiff*  
DISPLAY TECHNOLOGIES, LLC  
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8 **IN THE UNITED STATES DISTRICT COURT**  
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10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

11 DISPLAY TECHNOLOGIES, LLC,

12 Plaintiff,

13 v.

14 JVCKENWOOD USA CORPORATION,

15 Defendant.  
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Case No.

**ORIGINAL COMPLAINT**

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1 Plaintiff Display Technologies, LLC (“Plaintiff”) files this Complaint against  
2 JVCKenwood USA Corporation (“Defendant”) alleging:  
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4 **PARTIES**

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6 1. Plaintiff Display Technologies, LLC is Limited Liability Company organized  
7 under the laws of the State of Texas having its principal place of business at 1400 Preston  
8 Road, Ste. 400, Plano, Texas 75093.  
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10 2. Upon information and belief, Defendant JVCKenwood USA Corporation is a  
11 corporation organized and existing under the laws of the State of California with its  
12 principal place of business at 2201 E. Dominguez St., Long Beach, California 90810.  
13 Defendant may be served through its registered agent for service of process, Corporation  
14 Service Company, 251 Little Falls Dr., Wilmington, Delaware 19808.  
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17 **JURISDICTION AND VENUE**

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19 3. This is an action for infringement of a United States patent arising under 35  
20 U.S.C. §§ 271(a), 281, and 284 - 85. This Court has subject matter jurisdiction over this  
21 action under 28 U.S.C. §1331 and §1338(a).  
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23 4. Venue is proper in this district under 28 U.S.C. § 1400(b). Upon information  
24 and belief, Defendant has transacted business in this district, and has a regular place of  
25 business in Long Beach, California.  
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1           10. Upon information and belief, Defendant has been and is now infringing  
2 claims 12, 14, 16, 17, and 20 of the '723 Patent in the State of California, in this Judicial  
3 District, and elsewhere in the United States, by, among other things, directly or through  
4 intermediaries, making, using, importing, selling and offering for sale media systems with  
5 NFC and Bluetooth, *i.e.*, the Accused Instrumentalities which all operate in substantially  
6 the same manner covered by one or more claims of the '723 Patent to the injury of  
7 Plaintiff. Defendant is thus infringing the '723 Patent under the doctrine of equivalents.  
8 Defendant is therefore liable for infringement of the '723 Patent under 35 U.S.C. §.  
9 271(a).

10           11. Upon information and belief, to the extent any marking was required by 35  
11 U.S.C. § 287, predecessors in interest to the '723 Patent complied with such requirements.

12           12. The Accused Instrumentalities infringe claim 12 of the '723 Patent, and  
13 includes a wireless receiver (a Bluetooth network adapter); a security measure (security  
14 measures such as a Bluetooth PIN); and the media system disposed in an accessible  
15 relation to at least one interactive computer network that has a wireless range structured to  
16 permit authorized access to at least one interactive computer network (a NFC chip which  
17 allows access to the Bluetooth network), the wireless mobile device within said wireless  
18 range, in which said wireless mobile device is detectable by said media system (the  
19 Accused Instrumentality automatically detects a smartphone with NFC when placed  
20 within NFC range of the Accused Instrumentality), at least one digital media file initially  
21 disposed on the wireless mobile device (the smartphone includes one or more digital  
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1 media files such as music files), said media system being structured to detect said wireless  
2 mobile device disposed within said wireless range (the Accused Instrumentality  
3 automatically detects the smartphone when placed within NFC range), a communication  
4 link structured to dispose said media system and said wireless mobile device in a  
5 communicative relation with one another through at least one interactive computer  
6 network (the Accused Instrumentality includes a Bluetooth network adapter which places  
7 the NFC capable smartphone and the Accused Instrumentality in communication with one  
8 another), said communication link being initiated by said media system (it initiates the  
9 Bluetooth connection with the NFC capable smartphone), said wireless mobile device and  
10 media system being structured to transmit at least one digital media file between said  
11 communication link (the Accused Instrumentality includes a Bluetooth adapter which  
12 allows for the transmission of files between itself and the wireless mobile device), and  
13 said communication link is structured to bypass the security measure of the media system  
14 for a limited permissible use of the communication link by the wireless mobile device for  
15 only transferring the at least one digital media file to, and displaying the at least one  
16 digital media file on, the media system (the Accused Instrumentality bypasses the security  
17 measure of the Bluetooth network adapters using the NFC adapter, for the limited purpose  
18 of playing one or more digital media files). *See* Ex. B, Figs. 1-3.

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25 13. The Accused Instrumentalities infringe claim 14 of the '723 Patent, where  
26 the transmission of the at least one digital media file from the wireless mobile device to  
27 the media system completely bypasses the security measure (the Wi-Fi security settings  
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1 such as encryption or password requirements are completely bypassed for the purpose of  
2 transmitting the digital media file such as a photo). *See* Ex. B. Figs, 1-3.  
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4 14. The Accused Instrumentalities infringe claim 16 of the '723 Patent, as it is an  
5 audio system. *See* Ex. B. Figs, 1-3.  
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7 15. The Accused Instrumentalities infringe claim 17 of the '723 Patent, where  
8 the communication link is at least one of a peer-to-peer connection, Bluetooth connection,  
9 and a Wi-Fi connection (a Bluetooth connection). *See* Ex. B. Figs, 1-3.  
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11 16. The Accused Instrumentalities infringe claim 20 of the '723 Patent, where  
12 the at least one media file is provided by the wireless mobile device (the digital media file  
13 is provided by the NFC smartphone). *See* Ex. B. Figs, 1-3.  
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15 17. As a result of the Defendant's infringement of the '723 Patent, Plaintiff has  
16 suffered monetary damages in an amount not yet determined and will continue to suffer  
17 damages in the future unless Defendant's infringing activities are enjoined by this Court.  
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19 18. Unless a permanent injunction is issued enjoining Defendant and its agents,  
20 servants, employees, attorneys, representatives, affiliates, and all others acting on their  
21 behalf from infringing the '723 Patent, Plaintiff will be irreparably harmed.  
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23 **PRAYER FOR RELIEF**  
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25 Plaintiff requests that this Court enter:

26 1. A judgment in favor of Plaintiff that Defendant has infringed the '723 Patent;  
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1 Dated: August 17, 2018

SPENCER FANE LLP

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3 By: /s/ Bart Dalton  
4 **BART DALTON**  
5 Attorney for PLAINTIFF  
6 **DISPLAY TECHNOLOGIES, LLC**  
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