

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

INNOBRILLIANCE, LLC,

Plaintiff,

v.

**S.C.A.R., Inc., d/b/a STINGER
CERTIFIED ASSET RECOVERY**

Defendant.

Civil Case No. 6:18-cv-00263

Patent Case

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff InnoBrilliance, LLC (“InnoBrilliance”), through its attorneys, complains of S.C.A.R., Inc. d/b/a Stinger Certified Asset Recovery (“S.C.A.R.”), and alleges the following:

PARTIES

1. Plaintiff InnoBrilliance, LLC is a limited liability company organized and existing under the laws of Texas and maintains its principal place of business at 402 Roy Creek Lane, Dripping Springs, Texas 78620.

2. Defendant S.C.A.R., Inc. is a corporation organized and existing under the laws of Texas that maintains its principal place of business at 1550 NE Loop 410, Suite 121, San Antonio, Texas 78209.

JURISDICTION

3. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

4. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over S.C.A.R. because it has engaged in systematic and continuous business activities in the State of Texas. Specifically, S.C.A.R. is incorporated in the State, has its principal place of business in the State and provides its full range of services to residents in this State. Further, as described below, S.C.A.R. has committed acts of patent infringement giving rise to this action within the State.

VENUE

6. Venue is proper in this District under 28 U.S.C. § 1400(b) because S.C.A.R. has committed acts of patent infringement in this District; has a regular and established place of business in this District, located at 1550 NE Loop 410, Suite 121, San Antonio, Texas 78209; and is incorporated in Texas. In addition, InnoBrilliance has suffered harm in this district.

PATENTS-IN-SUIT

7. InnoBrilliance is the assignee of all right, title and interest in United States Patent No. 7,711,150 (the “’150 Patent”), United States Patent No. 7,881,498 (the “’498 Patent”), and United States Patent No. 8,009,870 (the “’870 Patent”) (collectively hereinafter “Patents-in-Suit”), including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the Patents-in-Suit. Accordingly, InnoBrilliance possesses the exclusive right and standing to prosecute the present action for infringement of the Patents-in-Suit against S.C.A.R.

The ’150 Patent

8. On May 4, 2010, the United States Patent and Trademark Office issued the ’150 Patent. The ’150 Patent is titled “Autonomous Wide-Angle License Plate Recognition.” The application leading to the ’150 Patent was filed on August 22, 2005 and is a national stage entry

of PCT/US03/21958, which was filed on July 10, 2003. A true and correct copy of the '150 Patent is attached hereto as Exhibit A and incorporated herein by reference.

9. The '150 Patent is valid and enforceable.

10. The '150 Patent describes a need for traffic police, highway patrol and mobile security personnel to accurately and efficiently identify potential issues with regards to nearby vehicles. Ex. A, 1:10–14.

11. The '150 Patent describes systems and methods of capturing, from a surveillance vehicle, “vehicle license plate number information” from a targeted vehicle “in a fully autonomous fashion.” Ex. A, 1:61-64. This captured license plate information is then applied “against a database to identify potential problems with the [targeted] vehicle or its driver.” *Id.* at 1:65-66.

The '498 Patent

12. On February 1, 2011, the United States Patent and Trademark Office issued the '498 Patent. The '498 Patent is titled “Autonomous Wide-Angle License Plate Recognition.” The application leading to the '498 Patent was filed on April 9, 2010, which is a continuation of U.S. Patent No. 10/546,555, leading to the '150 Patent; which is a National Stage Entry of PCT/US03/21958, which was filed on July 10, 2003. A true and correct copy of the '498 Patent is attached hereto as Exhibit B and incorporated herein by reference.

13. The '498 Patent is valid and enforceable.

14. The '498 Patent describes a need for traffic police, highway patrol and mobile security personnel to accurately and efficiently identify potential issues with regards to nearby vehicles. Ex. B, 1:20–24.

15. The '498 Patent describes systems and methods of capturing, from a surveillance vehicle, “vehicle license plate number information” from a targeted vehicle “in a fully autonomous

fashion.” Ex. B, 2:5-6. This captured license plate information is then applied “against a database to identify potential problems with the [targeted] vehicle or its driver.” *Id.* at 2:7-8.

The '870 Patent

16. On August 30, 2011, the United States Patent and Trademark Office issued the '870 Patent. The '870 Patent is titled “Autonomous Wide-Angle License Plate Recognition.” The application leading to the '870 Patent was filed on December 17, 2010, which is a continuation of U.S. Patent Application No. 12/757,262, leading to the '498 Patent; which is, in turn, a continuation of U.S. Patent No. 10/546,555, leading to the '150 Patent; which is a National Stage Entry of PCT/US03/21958, which was filed on July 10, 2003. A true and correct copy of the '870 Patent is attached hereto as Exhibit C and incorporated herein by reference.

17. The '870 Patent is valid and enforceable.

18. The '870 Patent describes a need for traffic police, highway patrol and mobile security personnel to accurately and efficiently identify potential issues with regards to nearby vehicles. Ex. C, 1:23–28.

19. The '870 Patent describes systems and methods of capturing, from a surveillance vehicle, “vehicle license plate number information” from a targeted vehicle “in a fully autonomous fashion.” Ex. C, 2:7-10. This captured license plate information is then applied “against a database to identify potential problems with the [targeted] vehicle or its driver.” *Id.* at 2:11-12.

COUNT I: INFRINGEMENT OF THE '150 PATENT


20. InnoBrilliance incorporates the above paragraphs herein by reference.

21. **Direct Infringement.** S.C.A.R. has been and continues to directly infringe at least claim 1 of the '150 Patent in this District and elsewhere in the United States by using a license

plate recognition (“LPR”) vehicle system to provide advanced asset recovery services to its customers:

S.C.A.R., Inc.

dba Stinger Certified Asset Recovery



We were established as an asset recovery company in 2007 and have been operating with the most advanced industry technology since the beginning. All agents and personnel are well versed in this technology which aids in using the software to its fullest potential.

Our fleets are equipped with GPS, computers, closed circuit fleet monitoring cameras, and LPR 2.0 camera systems. This is to ensure that information may be transmitted in real time and that the safety of our company and the public is a priority.

Available at: <http://www.stingerrecovery.com/>; webpage attached hereto as Exhibit D.

22. In particular, S.C.A.R. employs Digital Recognition Network’s (hereinafter “DRN”) Reaper Mobile LPR camera kits, together with the Car Detector Mobile (“CDM”) software, to surveil vehicles and to capture images of license plates (“S.C.A.R.’s LPR vehicle system”). S.C.A.R.’s president has publicly stated that S.C.A.R.’s LPR vehicle system uses Reaper Mobile LPR cameras:

The new camera kits have been tested in the Texas market where they have received great reviews from recovery agents. Frank Massey, President of S.C.A.R. Inc. explained, “The new Reaper cameras’ user friendly interface offers more detailed status information, making for an overall more efficient camera system. We can easily aim the cameras for better OCR coverage for improved performance and added revenue, without added costs.”

Available at: <https://drnrecovery.com/new-drn-reaper-two-and-four-camera-kits-offer-dramatically-improved-license-plate-image-capture-and-new-car-detector-mobile-cdm-6-0/>; webpage attached hereto as Exhibit E.

23. S.C.A.R., on its website, also identifies itself as a DRN affiliate that uses DRN's camera technology:





Available at: <http://www.stingerrecovery.com/aboutus.html>; webpage attached hereto as Exhibit F.

24. S.C.A.R.'s LPR vehicle system satisfies the preamble of claim 1: "[a] system for alerting an operator of a moving surveillance vehicle with respect to first and second license plates on moving first and second target vehicles within camera surveillance distance of the surveillance vehicle, respectively." For example, S.C.A.R.'s LPR vehicle system uses the Reaper Mobile LPR cameras, together with the Car Detector Mobile ("CDM") software, to surveil vehicles and to capture images of license plates. The LPR vehicle system performs an optical character recognition ("OCR") of the license plate image to determine the license plate number:

Pricing and Financing

DRN offers 100% financing and multiple payment options for qualified Affiliates. Contact us to learn more about our financing options.

Reaper Two Camera Kit	Reaper Four Camera Kit
\$11,000	\$13,000
	
<ul style="list-style-type: none">Optical Character Recognition (OCR)License plate image capture at up to 120 MPHLow power consumption at <8W averageBuilt-in DSP means less equipment in the vehicleInfrared and color images	<ul style="list-style-type: none">Optical Character Recognition (OCR)License plate image capture at up to 120 MPHLow power consumption at <8W averageBuilt-in DSP means less equipment in the vehicleInfrared and color images
Contact Sales	Contact Sales

Frequently Asked Questions

- What's included with the camera kit?**

The camera kit includes the LPR camera along with all the hardware and cables you need to install it on a vehicle.
- Do I have to pay for installation?**

No, our camera systems are easy and quick to install. Most people can install camera kit in less than a couple of hours.
- Does the camera kit include a laptop?**







No, you will need to purchase a laptop separately to install Card Detector Mobile software. We provide the software when you call our support team to activate your cameras after your system is installed.
- Do I have to be signed up with a provider to scan?**

No, it is not required for you to enroll with a Provider, but we highly recommend you do to expand your hotlist.
- Does this system sync with RDN?**

Yes, your assignments will be synced to your camera system.


Available at: <http://drnrecovery.com/repo-cameras/>; webpage attached hereto as Exhibit G.

25. For example, S.C.A.R.'s LPR vehicle system also allows the capturing of license plate information while the surveillance vehicle and target vehicle are both moving:

 License plate image capture at up to 120 MPH	 Infrared and color images	 Superior Optical Character Recognition (OCR)
 Easy troubleshooting with diagnostic tools	 Camera aiming tools for easy set-up	 Built-in DSP means less equipment in the vehicle

Available at: <http://drnrecovery.com/repo-cameras/>; see Ex. G.


26. The captured license plate number is compared to a hotlist of targeted license plate numbers. If a match between the captured license plate and the hotlist occurs, the driver of the surveillance vehicle is alerted:



Lenders upload their hotlist

Lenders upload their hot lists, which is distributed to assigned affiliates who receive a live in-car alert when they have a "hit" or have scanned a car that is out for recovery.

[See our providers](#)



Affiliates are alerted when a hotlist vehicle is scanned

When an affiliate scans a plate that is on the hotlist, they receive a live in-car alert. Additionally, Affiliates can use historical scans to help locate a vehicle.

[Become an Affiliate](#)

Available at: <https://drnrecovery.com/recovery-network/>; webpage attached hereto as Exhibit H.

27. S.C.A.R.'s LPR vehicle system satisfies claim element 1(a)(1): "at least first and second cameras mounted on the surveillance vehicle." For example, S.C.A.R.'s LPR vehicle system uses DRN's mobile LPR package, which contains two or four LPR cameras. When S.C.A.R. installs these cameras, it therefore mounts at least two cameras in its surveillance vehicle.

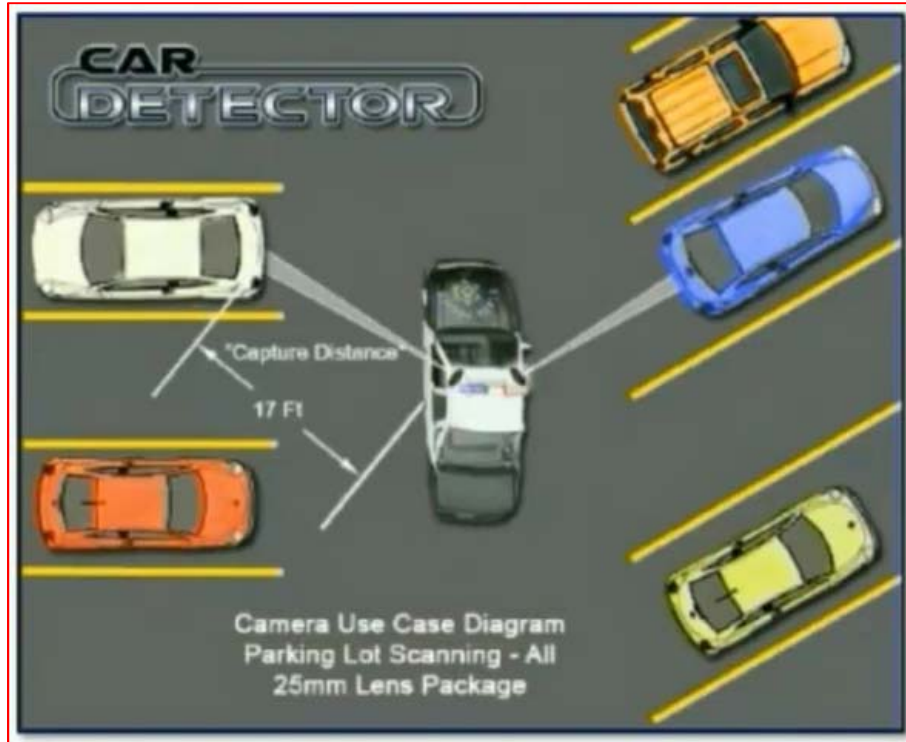
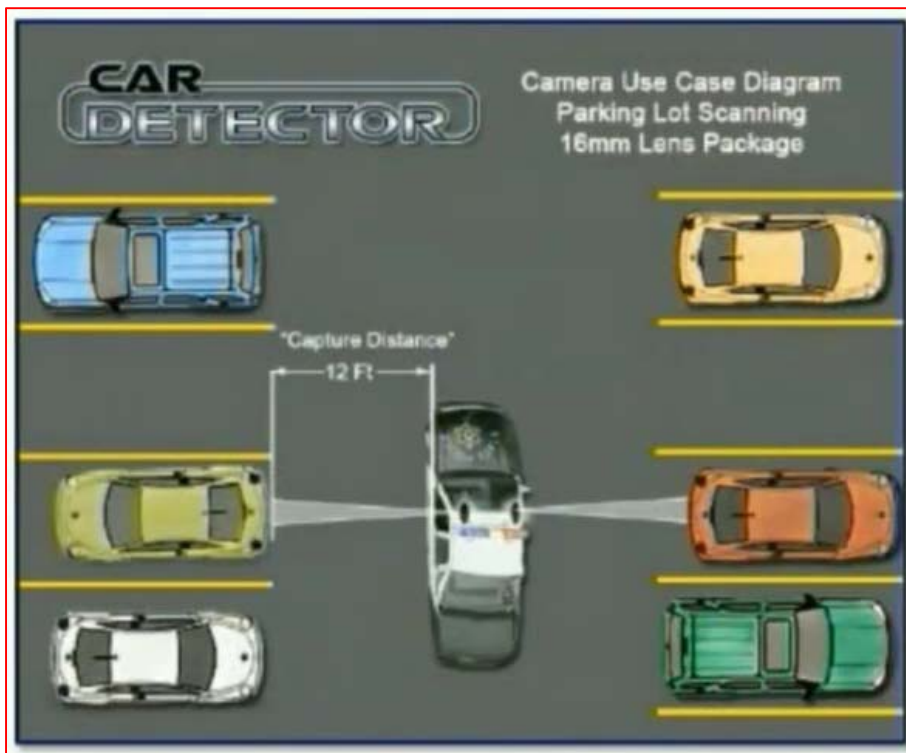
28. S.C.A.R.'s LPR vehicle system satisfies claim element 1(a)(2): "collectively configured to capture, without a need for input from the operator, images of each of the license plates of the target vehicles regardless of whether the target vehicles are in a same lane as the surveillance vehicle, or in left or right adjacent lanes to that of the surveillance vehicle." For example, S.C.A.R.'s LPR vehicle system scans the license plate of a target vehicle in multiple lanes of traffic. An image of the license plate is captured, and the license plate scan data is saved. With two or more cameras, S.C.A.R.'s LPR cameras capture license plate information from the target vehicle, without the need for operator input, regardless of whether the target vehicle is in the same lane or an adjacent lane to S.C.A.R.'s vehicle:

DRN mentioned its Reaper camera kits now provide:

- Superior optical character recognition (OCR)
- License plate image capture at up to 120 MPH
- Camera aiming tools for easy set-up
- Low power consumption at <8W average
- Built-in DSP means less equipment in the vehicle
- Easy troubleshooting with diagnostic tools
- Infrared and color images

Available at: <https://www.autoremarketing.com/financial-services/drn-unveils-new-camera-technology-metrics-of-revenue-potential>; webpage attached hereto as Exhibit I.

29. A DRN affiliate published an instructional video showing how the LPR cameras used by S.C.A.R.'s LPR vehicle system are used to capture license plate information at various angles in relation to the surveillance vehicles, further confirming that it can capture the license plate information of target vehicles in lanes adjacent to the surveillance vehicle:





Available at: <https://www.youtube.com/watch?v=OzWEIc-CiJ8>.

30. Additionally, the instructional video demonstrates that the LPR cameras used by S.C.A.R.'s LPR vehicle system is capable of capturing license plates from a target vehicle when the target vehicle is passing the surveillance vehicle. See <https://www.youtube.com/watch?v=OzWEIc-CiJ8>.

31. S.C.A.R.'s LPR vehicle system satisfies claim element 1(b): "at least one processor carried by the surveillance vehicle that continuously uses character recognition to determine the first and second license plate numbers only upon discovering that there is a potential problem related to the second or third moving vehicles, all without a need for input from the operator." For example, S.C.A.R.'s LPR vehicle system uses LPR cameras in conjunction with Car Detector Mobile ("CDM") software. The LPR vehicle system performs an optical character recognition ("OCR") of the license plate image to determine the license plate number:

Pricing and Financing

DRN offers 100% financing and multiple payment options for qualified Affiliates. Contact us to learn more about our financing options.

Reaper Two Camera Kit	Reaper Four Camera Kit
\$11,000	\$13,000
	
<ul style="list-style-type: none">Optical Character Recognition (OCR)License plate image capture at up to 120 MPHLow power consumption at <8W averageBuilt-in DSP means less equipment in the vehicleInfrared and color images	<ul style="list-style-type: none">Optical Character Recognition (OCR)License plate image capture at up to 120 MPHLow power consumption at <8W averageBuilt-in DSP means less equipment in the vehicleInfrared and color images
Contact Sales	Contact Sales

Frequently Asked Questions

What's included with the camera kit?

The camera kit includes the LPR camera along with all the hardware and cables you need to install it on a vehicle.

Do I have to pay for installation?

No, our camera systems are easy and quick to install. Most people can install camera kit in less than a couple of hours.

Does the camera kit include a laptop?

No, you will need to purchase a laptop separately to install Card Detector Mobile software. We provide the software when you call our support team to activate your cameras after your system is installed.

Do I have to be signed up with a provider to scan?


No, it is not required for you to enroll with a Provider, but we highly recommend you do to expand your hotlist.


Does this system sync with RDN?


Yes, your assignments will be synced to your camera system.


Available at: <http://drnrecovery.com/repo-cameras/>; see Ex. G.


32. For example, S.C.A.R.'s LPR vehicle system also allows the capturing of license plate information while the surveillance vehicle and target vehicle are both moving:


 License plate image capture at up to 120 MPH

 Infrared and color images

 Superior Optical Character Recognition (OCR)

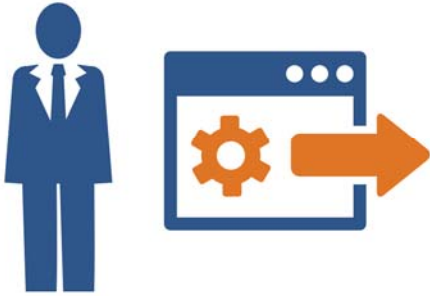
 Easy troubleshooting with diagnostic tools

 Camera aiming tools for easy set-up

 Built-in DSP means less equipment in the vehicle

Available at: <http://drnrecovery.com/repo-cameras/>; see Ex. G.

33. The CDM software includes a hotlist of license plate information for vehicles targeted for repossession. The application software continuously scans license plate data to identify license plate numbers from the captured license plate images:




Lenders upload their hotlist

Lenders upload their hot lists, which is distributed to assigned affiliates who receive a live in-car alert when they have a "hit" or have scanned a car that is out for recovery.

[See our providers](#)

Available at: <https://drmrecovery.com/recovery-network/>; *see* Ex. H.

34. When a license plate number matches a national hotlist, the affiliate is alerted:



Affiliates are alerted when a hotlist vehicle is scanned

When an affiliate scans a plate that is on the hotlist, they receive a live in-car alert. Additionally, Affiliates can use historical scans to help locate a vehicle.

[Become an Affiliate](#)

Available at: <https://drmrecovery.com/recovery-network/>; *see* Ex. H.

35. InnoBrilliance is entitled to recover damages adequate to compensate it for such infringement in an amount no less than a reasonable royalty under 35 U.S.C. § 284.

COUNT II: INFRINGEMENT OF THE '498 PATENT

36. InnoBrilliance incorporates the above paragraphs herein by reference.

37. **Direct Infringement.** S.C.A.R. has been and continues to directly infringe at least claim 1 of the '498 Patent in this District and elsewhere in the United States by using a license plate recognition ("LPR") vehicle system to provide advanced asset recovery services to its customers:

S.C.A.R., Inc.

dba *Stinger Certified Asset Recovery*



We were established as an asset recovery company in 2007 and have been operating with the most advanced industry technology since the beginning.

All agents and personnel are well versed in this technology which aids in using the software to its fullest potential.

Our fleets are equipped with GPS, computers, closed circuit fleet monitoring cameras, and LPR 2.0 camera systems. This is to ensure that information may be transmitted in real time and that the safety of our company and the public is a priority.

Available at: <http://www.stingerrecovery.com/>; see Ex. D.

38. In particular, S.C.A.R. employs Digital Recognition Network's (hereinafter "DRN") Reaper Mobile LPR camera kits, together with the Car Detector Mobile ("CDM") software, to surveil vehicles and to capture images of license plates ("S.C.A.R.'s LPR vehicle system"). S.C.A.R.'s president has publicly stated that S.C.A.R.'s LPR vehicle system uses Reaper Mobile LPR cameras:

The new camera kits have been tested in the Texas market where they have received great reviews from recovery agents. Frank Massey, President of S.C.A.R. Inc. explained, "The new Reaper cameras' user friendly interface offers more detailed status information, making for an overall more efficient camera system. We can easily aim the cameras for better OCR coverage for improved performance and added revenue, without added costs."

Available at: <https://drnrecovery.com/new-drn-reaper-two-and-four-camera-kits-offer-dramatically-improved-license-plate-image-capture-and-new-car-detector-mobile-cdm-6-0/>; see Ex. E.

39. S.C.A.R., on its website, also identifies itself as a DRN affiliate that uses DRN's camera technology:

S.C.A.R., Inc.

*dba, **Stinger Certified Asset Recovery***



We were established as an asset recovery company in 2007 and have been operating in RDN and with DRN since the beginning.

Available at: <http://www.stingerrecovery.com/aboutus.html>; see Ex. F.

40. If the preamble is found to be limiting, S.C.A.R. satisfies the preamble of claim 1 by performing: “a method of surveilling multiple target vehicles.” For example, S.C.A.R.’s LPR vehicle system uses the Reaper Mobile LPR cameras, together with the Car Detector Mobile (“CDM”) software, to surveil vehicles and to capture images of license plates. The LPR vehicle system performs an optical character recognition (“OCR”) of the license plate image to determine the license plate number:

Pricing and Financing

DRN offers 100% financing and multiple payment options for qualified Affiliates. Contact us to learn more about our financing options.

<h4>Reaper Two Camera Kit</h4> <p>\$11,000</p>  <ul style="list-style-type: none">Optical Character Recognition (OCR)License plate image capture at up to 120 MPHLow power consumption at <8W averageBuilt-in DSP means less equipment in the vehicleInfrared and color images <p>Contact Sales</p>	<h4>Reaper Four Camera Kit</h4> <p>\$13,000</p>  <ul style="list-style-type: none">Optical Character Recognition (OCR)License plate image capture at up to 120 MPHLow power consumption at <8W averageBuilt-in DSP means less equipment in the vehicleInfrared and color images <p>Contact Sales</p>
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Frequently Asked Questions

What's included with the camera kit? ●
The camera kit includes the LPR camera along with all the hardware and cables you need to install it on a vehicle.

Do I have to pay for installation? ●
No, our camera systems are easy and quick to install. Most people can install camera kit in less than a couple of hours.


Does the camera kit include a laptop? ●
No, you will need to purchase a laptop separately to install Card Detector Mobile software. We provide the software when you call our support team to activate your cameras after your system is installed.

Do I have to be signed up with a provider to scan? ●
No, it is not required for you to enroll with a Provider, but we highly recommend you do to expand your hotlist.

Does this system sync with RDN? ●
Yes, your assignments will be synced to your camera system.

Available at: <http://drnrecovery.com/repo-cameras/>; see Ex. G.

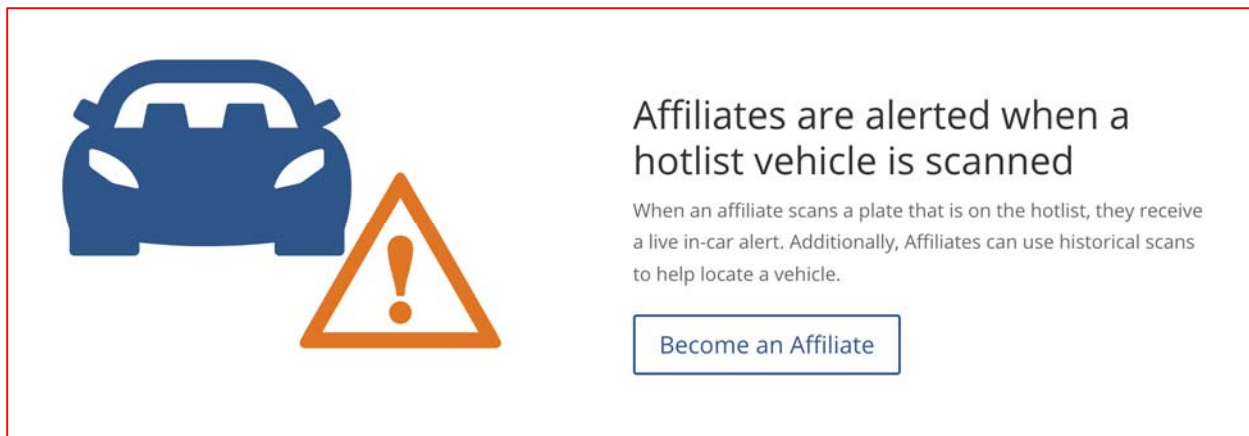
41. The captured license plate number is compared to a hotlist of targeted license plate numbers. If a match between the captured license plate and the hotlist occurs, the driver of the surveillance vehicle is alerted:



Lenders upload their hotlist

Lenders upload their hot lists, which is distributed to assigned affiliates who receive a live in-car alert when they have a "hit" or have scanned a car that is out for recovery.

[See our providers](#)



Available at: <https://drmrecovery.com/recovery-network/>; *see* Ex. H.

42. S.C.A.R. uses an LPR vehicle system, which uses DRN’s mobile LPR package containing two or four LPR cameras. When S.C.A.R. installs these cameras, it therefore mounts at least two cameras in its surveillance vehicle.

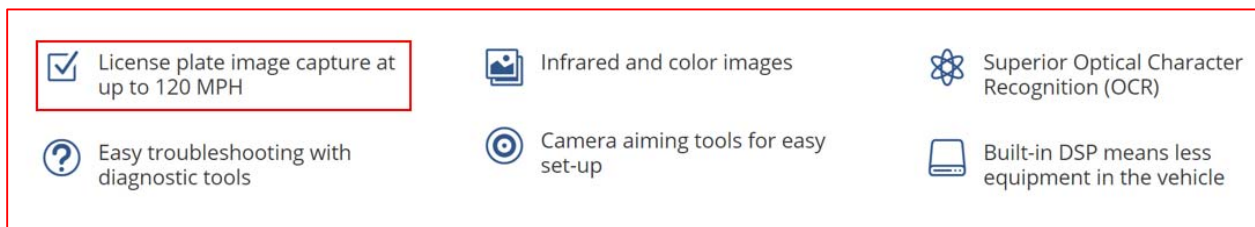
43. S.C.A.R. satisfies claim element 1(a) by performing the step of: “providing or operating the surveillance vehicle with a camera system disposed to capture information on each of the target vehicles regardless of whether the target vehicles are in a same lane as the surveillance vehicle, or in left or right adjacent lanes to that of the surveillance vehicle, while the surveillance and the target vehicles are all moving.” For example, S.C.A.R.’s LPR vehicle system scans the license plate of a target vehicle in multiple lanes of traffic. An image of the license plate is captured, and the license plate scan data is saved. With two or more cameras, S.C.A.R.’s LPR cameras capture license plate information from the target vehicle, without the need for operator input, regardless of whether the target vehicle is in the same lane or an adjacent lane to S.C.A.R.’s vehicle:

DRN mentioned its Reaper camera kits now provide:

- Superior optical character recognition (OCR)
- License plate image capture at up to 120 MPH
- Camera aiming tools for easy set-up
- Low power consumption at <8W average
- Built-in DSP means less equipment in the vehicle
- Easy troubleshooting with diagnostic tools
- Infrared and color images

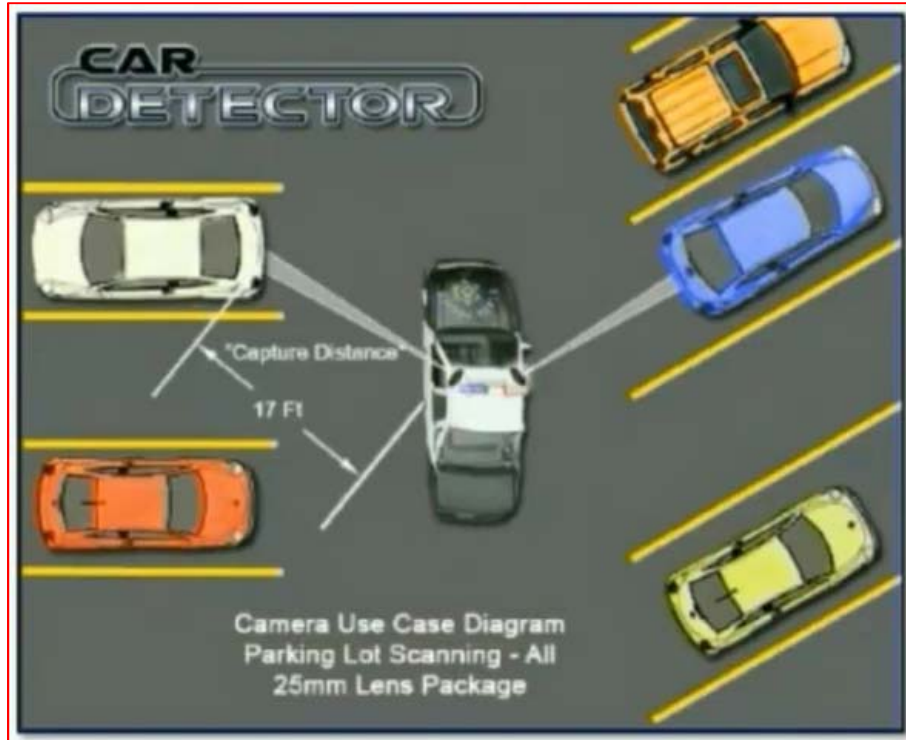
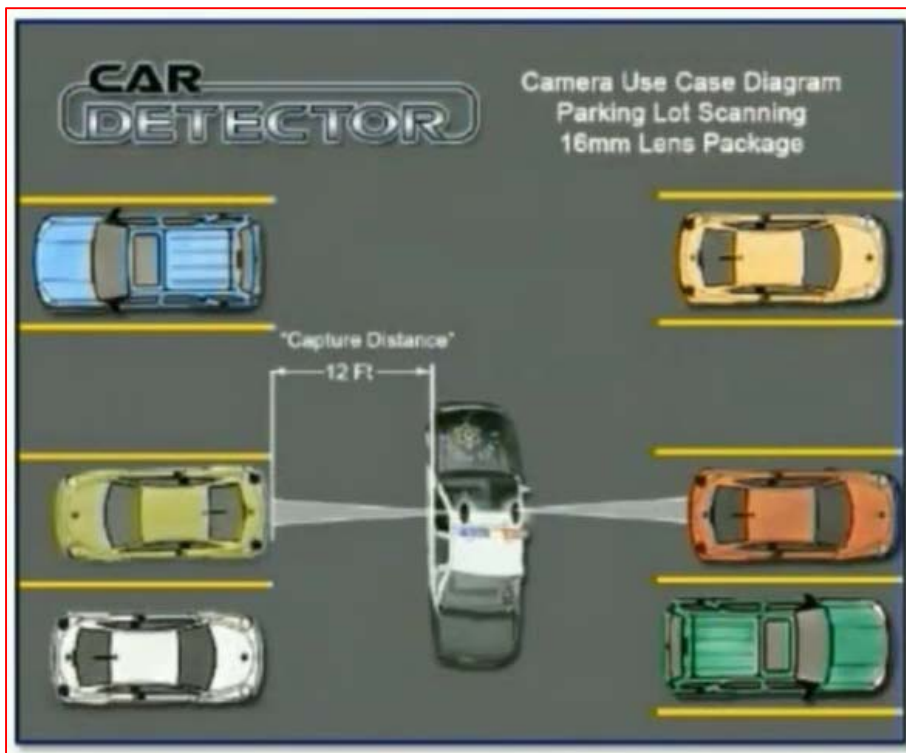
Available at: <https://www.autoremarketing.com/financial-services/drn-unveils-new-camera-technology-metrics-of-revenue-potential>; see Ex. I.

44. For example, S.C.A.R.'s LPR vehicle system also allows the capturing of license plate information while the surveillance vehicle and target vehicle are both moving:



Available at: <http://dnrecovery.com/repo-cameras/>; see Ex. G.

45. A DRN affiliate published an instructional video showing how the LPR cameras used by S.C.A.R.'s LPR vehicle system are used to capture license plate information at various angles in relation to the surveillance vehicles, further confirming that it can capture the license plate information of target vehicles in lanes adjacent to the surveillance vehicle:





Available at: <https://www.youtube.com/watch?v=OzWEIc-CiJ8>.

46. Additionally, the instructional video demonstrates that the LPR cameras used by S.C.A.R.’s LPR vehicle system are capable of capturing license plates from a target vehicle when the target vehicle is passing the surveillance vehicle. See <https://www.youtube.com/watch?v=OzWEIc-CiJ8>.

47. S.C.A.R. satisfies claim element 1(b) by performing the step of: “providing or operating the surveillance vehicle with a computer programmed to use the license plate information to determine license plate numbers for each of the target vehicles, and alert an operator of the surveillance vehicle only upon discovering that there is a potential problem related to one of the target vehicles, all without a need for input from the operator.” For example, S.C.A.R.’s LPR vehicle system uses LPR cameras in conjunction with Car Detector Mobile (“CDM”) software. The LPR vehicle system performs an optical character recognition (“OCR”) of the license plate image to determine the license plate number:

Pricing and Financing

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<div style="background-color: #f0f0f0; padding: 5px; text-align: center; font-weight: bold;">Reaper Two Camera Kit</div> <div style="text-align: center; font-size: 2em; font-weight: bold; color: #0056b3;">\$11,000</div> <div style="text-align: center; margin: 10px 0;">  </div> <ul style="list-style-type: none"> Optical Character Recognition (OCR) License plate image capture at up to 120 MPH Low power consumption at <8W average Built-in DSP means less equipment in the vehicle Infrared and color images <div style="text-align: center; margin-top: 10px;"> <input type="button" value="Contact Sales"/> </div>	<div style="background-color: #0056b3; color: white; padding: 5px; text-align: center; font-weight: bold;">Reaper Four Camera Kit</div> <div style="text-align: center; font-size: 2em; font-weight: bold; color: #0056b3;">\$13,000</div> <div style="text-align: center; margin: 10px 0;">  </div> <ul style="list-style-type: none"> Optical Character Recognition (OCR) License plate image capture at up to 120 MPH Low power consumption at <8W average Built-in DSP means less equipment in the vehicle Infrared and color images <div style="text-align: center; margin-top: 10px;"> <input type="button" value="Contact Sales"/> </div>
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Do I have to be signed up with a provider to scan? ●
No, it is not required for you to enroll with a Provider, but we highly recommend you do to expand your hotlist.

Does this system sync with RDN? ●
Yes, your assignments will be synced to your camera system.

Available at: <http://drnrecovery.com/repo-cameras/>; *see* Ex. G.

48. The CDM software includes a hotlist of license plate information for vehicles targeted for repossession. The application software continuously scans license plate data to identify license plate numbers from the captured license plate images:



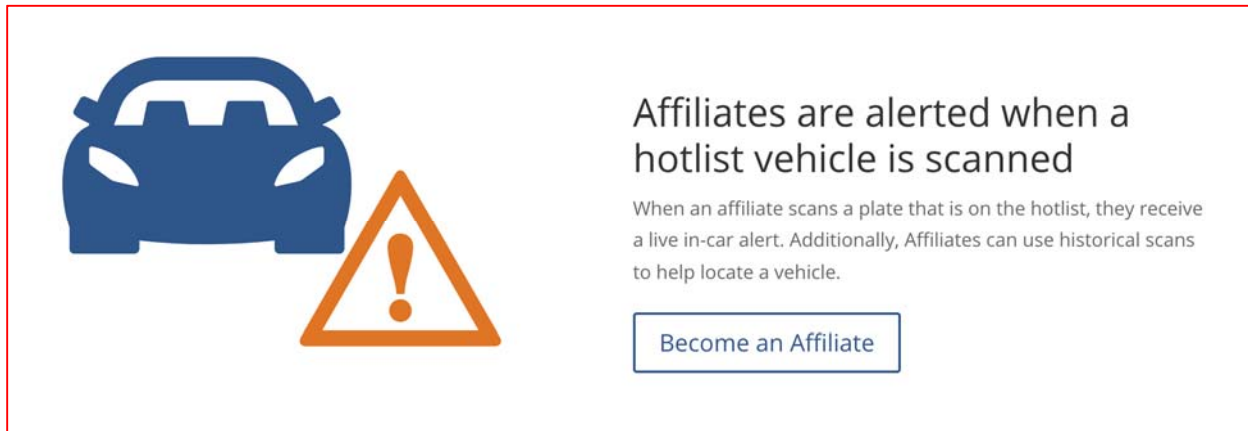
Lenders upload their hotlist

Lenders upload their hot lists, which is distributed to assigned affiliates who receive a live in-car alert when they have a "hit" or have scanned a car that is out for recovery.

[See our providers](#)

Available at: <https://drnrecovery.com/recovery-network/>; *see* Ex. H.

49. When a license plate number matches a national hotlist, the affiliate is alerted:



Affiliates are alerted when a hotlist vehicle is scanned

When an affiliate scans a plate that is on the hotlist, they receive a live in-car alert. Additionally, Affiliates can use historical scans to help locate a vehicle.

Become an Affiliate

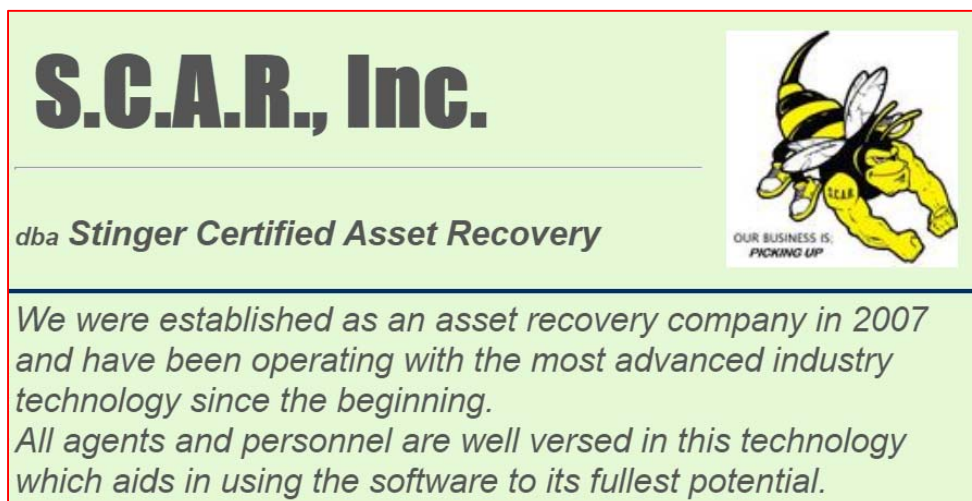
Available at: <https://drnrecovery.com/recovery-network/>; see Ex. H.

50. InnoBrilliance is entitled to recover damages adequate to compensate it for such infringement in an amount no less than a reasonable royalty under 35 U.S.C. § 284.

COUNT III: INFRINGEMENT OF THE '870 PATENT

51. InnoBrilliance incorporates the above paragraphs herein by reference.

52. **Direct Infringement.** S.C.A.R. has been and continues to directly infringe at least claim 1 of the '870 Patent in this District and elsewhere in the United States by using a license plate recognition (“LPR”) vehicle system to provide advanced asset recovery services to its customers:



S.C.A.R., Inc.

dba *Stinger Certified Asset Recovery*

We were established as an asset recovery company in 2007 and have been operating with the most advanced industry technology since the beginning. All agents and personnel are well versed in this technology which aids in using the software to its fullest potential.

Our fleets are equipped with GPS, computers, closed circuit fleet monitoring cameras, and LPR 2.0 camera systems. This is to ensure that information may be transmitted in real time and that the safety of our company and the public is a priority.

Available at: <http://www.stingerrecovery.com/>; *see* Ex D.

53. In particular, S.C.A.R. employs Digital Recognition Network's (hereinafter "DRN") Reaper Mobile LPR camera kits, together with the Car Detector Mobile ("CDM") software, to surveil vehicles and to capture images of license plates ("S.C.A.R.'s LPR vehicle system"). S.C.A.R.'s president has publicly stated that S.C.A.R.'s LPR vehicle system uses Reaper Mobile LPR cameras:

The new camera kits have been tested in the Texas market where they have received great reviews from recovery agents. Frank Massey, President of S.C.A.R. Inc. explained, "The new Reaper cameras' user friendly interface offers more detailed status information, making for an overall more efficient camera system. We can easily aim the cameras for better OCR coverage for improved performance and added revenue, without added costs."

Available at: <https://drnrecovery.com/new-drn-reaper-two-and-four-camera-kits-offer-dramatically-improved-license-plate-image-capture-and-new-car-detector-mobile-cdm-6-0/>; *see* Ex. E.

54. S.C.A.R., on its website, also identifies itself as a DRN affiliate that uses DRN's camera technology:

S.C.A.R., Inc.

*dba, **Stinger Certified Asset Recovery***



We were established as an asset recovery company in 2007 and have been operating in RDN and with DRN since the beginning.

Available at: <http://www.stingerrecovery.com/aboutus.html>; *see* Ex. F.

55. S.C.A.R.’s LPR vehicle system satisfies the preamble of claim 1: “a system for alerting an operator of a surveillance vehicle moving in a first lane, with respect to (a) a first license plate on a first target vehicle traveling in the first lane in front of the surveillance vehicle, (b) a second license plate on a second target vehicle traveling in a second lane to the left of the surveillance vehicle, (c) a third license plate on a third target vehicle traveling in a third lane to the right of the surveillance vehicle, and (d) a fourth license plate on a fourth target vehicle traveling in the first lane behind the surveillance vehicle.” For example, S.C.A.R.’s LPR vehicle system uses the Reaper Mobile LPR cameras, together with the Car Detector Mobile (“CDM”) software, to surveil vehicles and to capture images of license plates. The LPR vehicle system performs an optical character recognition (“OCR”) of the license plate image to determine the license plate number:

Pricing and Financing

DRN offers 100% financing and multiple payment options for qualified Affiliates. Contact us to learn more about our financing options.

<div style="background-color: #f0f0f0; padding: 5px; text-align: center; font-weight: bold;">Reaper Two Camera Kit</div> <div style="text-align: center; font-size: 2em; font-weight: bold; color: #0056b3;">\$ 11,000</div> <div style="text-align: center; margin: 10px 0;">  </div> <ul style="list-style-type: none"> Optical Character Recognition (OCR) License plate image capture at up to 120 MPH Low power consumption at <8W average Built-in DSP means less equipment in the vehicle Infrared and color images <div style="text-align: center; margin-top: 10px;"> Contact Sales </div>	<div style="background-color: #0056b3; color: white; padding: 5px; text-align: center; font-weight: bold;">Reaper Four Camera Kit</div> <div style="text-align: center; font-size: 2em; font-weight: bold; color: #0056b3;">\$ 13,000</div> <div style="text-align: center; margin: 10px 0;">  </div> <ul style="list-style-type: none"> Optical Character Recognition (OCR) License plate image capture at up to 120 MPH Low power consumption at <8W average Built-in DSP means less equipment in the vehicle Infrared and color images <div style="text-align: center; margin-top: 10px;"> Contact Sales </div>
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Frequently Asked Questions

What's included with the camera kit?

The camera kit includes the LPR camera along with all the hardware and cables you need to install it on a vehicle.

Do I have to pay for installation?

No, our camera systems are easy and quick to install. Most people can install camera kit in less than a couple of hours.

Does the camera kit include a laptop?

No, you will need to purchase a laptop separately to install Card Detector Mobile software. We provide the software when you call our support team to activate your cameras after your system is installed.

Do I have to be signed up with a provider to scan?


No, it is not required for you to enroll with a Provider, but we highly recommend you do to expand your hotlist.


Does this system sync with RDN?


Yes, your assignments will be synced to your camera system.


Available at: <http://drnrecovery.com/repo-cameras/>; see Ex. G.


56. For example, S.C.A.R.'s LPR vehicle system also allows the capturing of license plate information while the surveillance vehicle and target vehicle are both moving:


 License plate image capture at up to 120 MPH

 Infrared and color images

 Superior Optical Character Recognition (OCR)

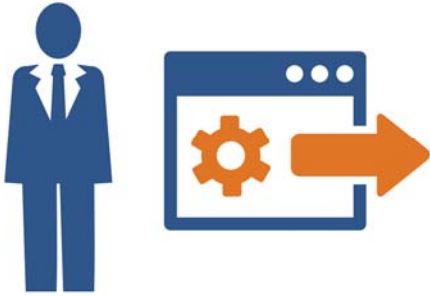
 Easy troubleshooting with diagnostic tools

 Camera aiming tools for easy set-up

 Built-in DSP means less equipment in the vehicle

Available at: <http://drnrecovery.com/repo-cameras/>; see Ex. G.


57. The captured license plate number is compared to a hotlist of targeted license plate numbers. If a match between the captured license plate and the hotlist occurs, the driver of the surveillance vehicle is alerted:



Lenders upload their hotlist

Lenders upload their hot lists, which is distributed to assigned affiliates who receive a live in-car alert when they have a "hit" or have scanned a car that is out for recovery.

[See our providers](#)



Affiliates are alerted when a hotlist vehicle is scanned

When an affiliate scans a plate that is on the hotlist, they receive a live in-car alert. Additionally, Affiliates can use historical scans to help locate a vehicle.

[Become an Affiliate](#)

Available at: <https://dmnrecovery.com/recovery-network/>; *see* Ex. H.

58. S.C.A.R.'s LPR vehicle system satisfies claim element 1(a): "at least a first camera mounted on the surveillance vehicle, collectively figured to autonomously capture images of each of the license plates." For example, S.C.A.R.'s LPR vehicle system uses DRN's mobile LPR package, which contains two or four LPR cameras. When S.C.A.R. installs these cameras, it therefore mounts at least two cameras in its surveillance vehicle.

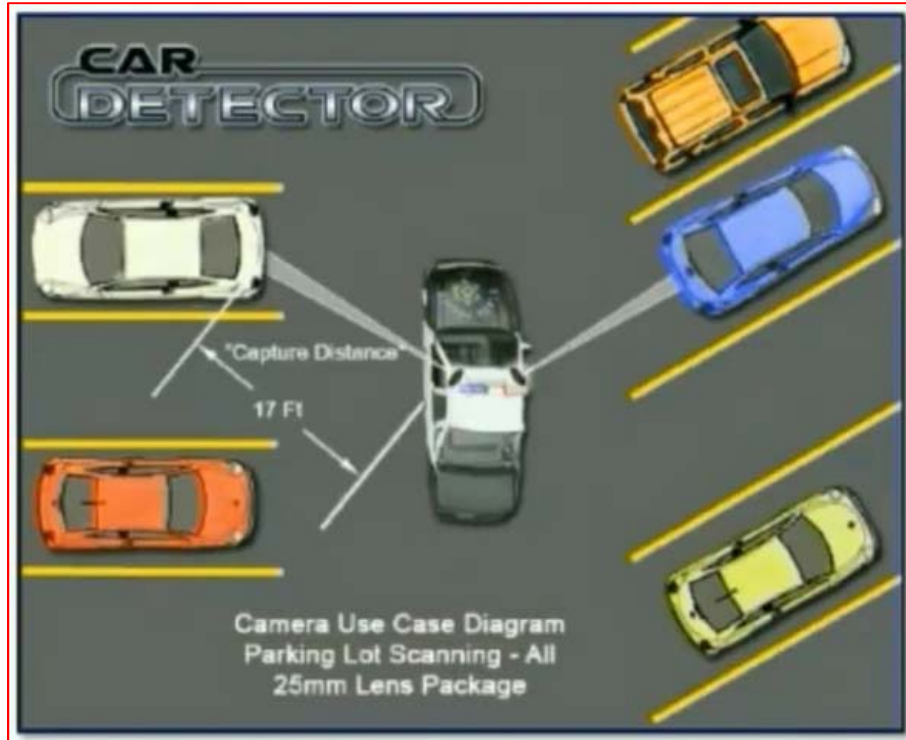
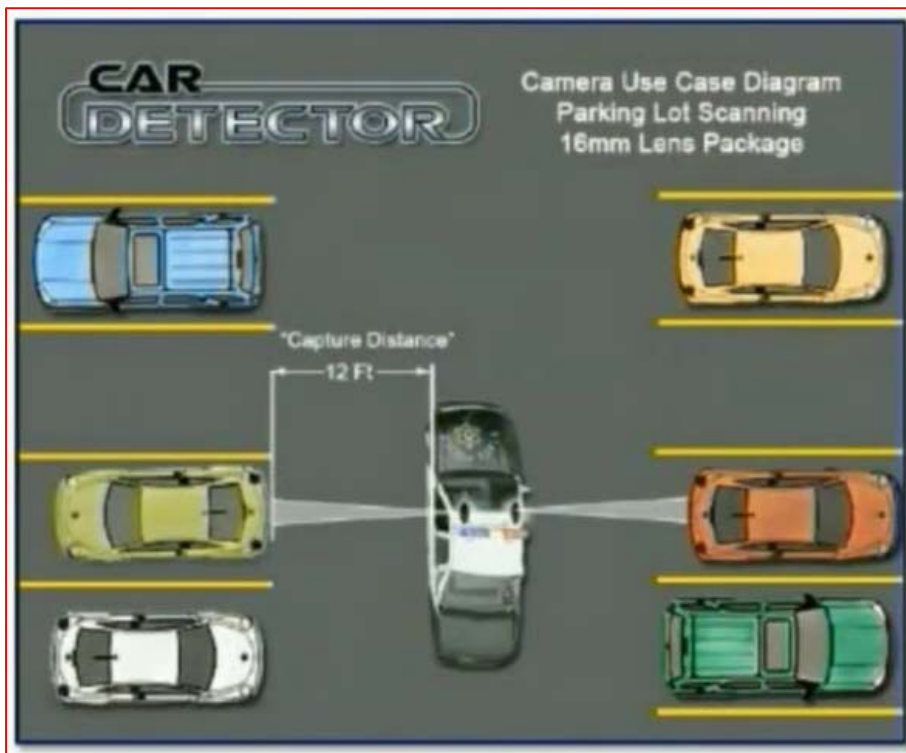
59. S.C.A.R.'s LPR vehicle system scans the license plate of a target vehicle in multiple lanes of traffic. An image of the license plate is captured, and the license plate scan data is saved. With two or more cameras, S.C.A.R.'s LPR cameras capture license plate information from the target vehicle, without the need for operator input, regardless of whether the target vehicle is in the same lane or an adjacent lane to S.C.A.R.'s vehicle:

DRN mentioned its Reaper camera kits now provide:

- Superior optical character recognition (OCR)
- License plate image capture at up to 120 MPH
- Camera aiming tools for easy set-up
- Low power consumption at <8W average
- Built-in DSP means less equipment in the vehicle
- Easy troubleshooting with diagnostic tools
- Infrared and color images

Available at: <https://www.autoremarketing.com/financial-services/drn-unveils-new-camera-technology-metrics-of-revenue-potential>; *see* Ex. I.

60. A DRN affiliate published an instructional video showing how the LPR cameras used by S.C.A.R.'s LPR vehicle system are used to capture license plate information at various angles in relation to the surveillance vehicles, further confirming that it can capture the license plate information of target vehicles in lanes adjacent to the surveillance vehicle:





Available at: <https://www.youtube.com/watch?v=OzWEIc-CiJ8>,

61. Additionally, the instructional video demonstrates that the LPR cameras used by S.C.A.R.'s LPR vehicle system is capable of capturing license plates from a target vehicle when the target vehicle is passing the surveillance vehicle. See <https://www.youtube.com/watch?v=OzWEIc-CiJ8>.

62. S.C.A.R.'s LPR vehicle system satisfies claim element 1(b): "at least one processor carried by the surveillance vehicle that autonomously applies character recognition to the images to determine corresponding license plate numbers, and to autonomously alert the operator when any one of the license plate numbers matches an entry in a database relating to a possible law enforcement-related problem." For example, S.C.A.R.'s LPR vehicle system uses LPR cameras in conjunction with Car Detector Mobile ("CDM") software. The LPR vehicle system performs an optical character recognition ("OCR") of the license plate image to determine the license plate number:

Pricing and Financing

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<h4>Reaper Two Camera Kit</h4> <p>\$11,000</p>  <ul style="list-style-type: none">Optical Character Recognition (OCR)License plate image capture at up to 120 MPHLow power consumption at <8W averageBuilt-in DSP means less equipment in the vehicleInfrared and color images <p>Contact Sales</p>	<h4>Reaper Four Camera Kit</h4> <p>\$13,000</p>  <ul style="list-style-type: none">Optical Character Recognition (OCR)License plate image capture at up to 120 MPHLow power consumption at <8W averageBuilt-in DSP means less equipment in the vehicleInfrared and color images <p>Contact Sales</p>
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Frequently Asked Questions

What's included with the camera kit? ●
The camera kit includes the LPR camera along with all the hardware and cables you need to install it on a vehicle.

Do I have to pay for installation? ●
No, our camera systems are easy and quick to install. Most people can install camera kit in less than a couple of hours.


Does the camera kit include a laptop? ●
No, you will need to purchase a laptop separately to install Card Detector Mobile software. We provide the software when you call our support team to activate your cameras after your system is installed.

Do I have to be signed up with a provider to scan? ●
No, it is not required for you to enroll with a Provider, but we highly recommend you do to expand your hotlist.

Does this system sync with RDN? ●
Yes, your assignments will be synced to your camera system.

Available at: <http://drnrecovery.com/repo-cameras/>; see Ex. G.

63. The CDM software includes a hotlist of license plate information for vehicles targeted for repossession. The application software continuously scans license plate data to identify license plate numbers from the captured license plate images:



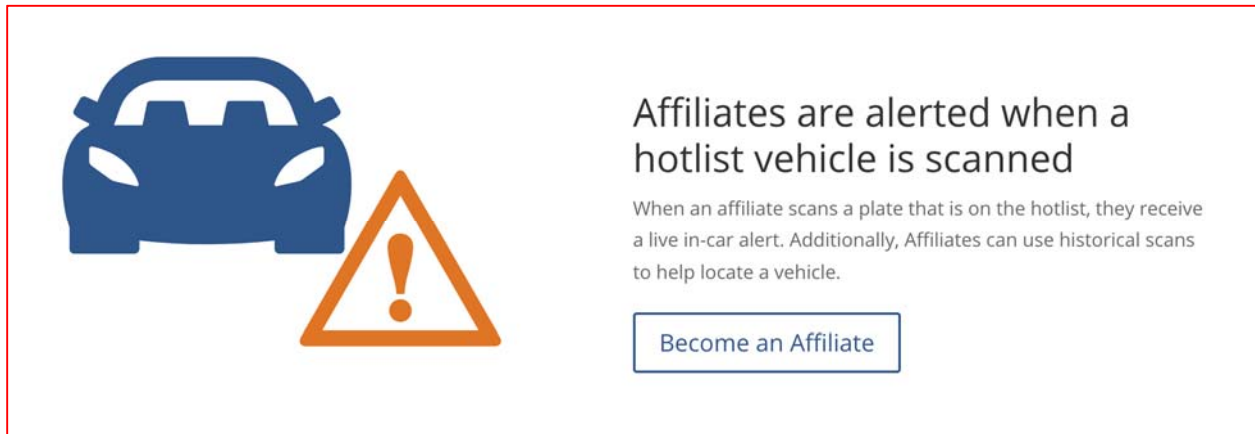
Lenders upload their hotlist

Lenders upload their hot lists, which is distributed to assigned affiliates who receive a live in-car alert when they have a "hit" or have scanned a car that is out for recovery.

[See our providers](#)

Available at: <https://drnrecovery.com/recovery-network/>; see Ex. H.

64. When a license plate number matches a national hotlist, the affiliate is alerted:



Available at: <https://drnrecovery.com/recovery-network/>; *see* Ex. H.

65. InnoBrilliance is entitled to recover damages adequate to compensate it for such infringement in an amount no less than a reasonable royalty under 35 U.S.C. § 284.

JURY DEMAND

66. Under Rule 38(b) of the Federal Rules of Civil Procedure, InnoBrilliance respectfully requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, InnoBrilliance asks this Court to enter judgment against S.C.A.R., granting the following relief:

- A. A declaration that S.C.A.R. has infringed the Patents-in-Suit;
- B. An award of damages to compensate InnoBrilliance for S.C.A.R.'s direct infringement of the Patents-in-Suit;
- C. An award of damages, including trebling of all damages, sufficient to remedy S.C.A.R.'s infringement of the Patents-in-Suit under 35 U.S.C. § 284;
- D. A declaration that this case is exceptional, and an award to InnoBrilliance of reasonable attorneys' fees, expenses and costs under 35 U.S.C. § 285;

- E. An award of prejudgment and post-judgment interest; and
- F. Such other relief as this Court or jury may deem proper and just.

Dated: September 6, 2018

Respectfully submitted,

/s/ J. Scott Denko

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