

Nicholas Ranallo (SBN 275016)  
nick@ranallolawoffice.com  
2443 Fillmore St., #380-7508  
San Francisco, CA 94115-  
T: (831) 607-9229  
F: (831) 533-5073

*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Secure Cam, LLC, a Wyoming Limited  
Liability Company

Plaintiff,

vs.

Genexus, LLC a California Limited Liability  
Company

Defendant.

Case Number:

**COMPLAINT – JURY TRIAL  
DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Secure Cam, LLC (“Plaintiff”) brings this complaint against Genexus, 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 Genexus LLC is a limited liability company incorporated under the laws of California, with a principal place of business at 58 West Portal Ave, #166, San Francisco, CA 94127.

**JURISDICTION AND VENUE**

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- 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 regularly conducts business in the State of California; and continues to commit acts of patent infringement in the State of California including by making, using, offering to sell, and/or selling Accused Products within the State of California and this Judicial District.
- 6. Venue is proper in this district pursuant to 1400(b). Defendant is subject to this Court’s personal jurisdiction because, *inter alia*, Defendant has 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; is incorporated in this Judicial District and has its principal place of business in this Judicial District.

**FACTS**

- 7. Plaintiff is the owner, by assignment, of the ’158 Patent, titled “System for Transmitting Video Images over a Computer Network to a Remote Receiver,” which was duly and legally issued on August 14, 2007 by the United States Patent and Trademark Office (“USPTO”), and claims priority from Provisional Application 60/085,818, which was filed on May 18, 1998.
- 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(b) (’158 PATENT)**

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

- 1 11. Claim 12 of the '158 Patent covers “[a] system for transmitting a real-time video and remote  
2 control commands over a digital network, said system comprising a transmitter containing  
3 one or more digitized frames of said real-time video being transmitted, the digital network  
4 connected to said transmitter, and one or more remote receivers connected to said network  
5 for receiving said video from said transmitter, wherein at least one of said receivers is  
6 configured to receive one or more control commands from a user, wherein said transmitter  
7 is configured to receive and interpret at least one of said control commands from said one of  
8 said receivers over said network, and wherein, upon interpretation of said control command,  
9 said transmitter dynamically changes the operation of said transmitter while said video is  
10 being transmitted, whereby said user can remotely control the operation of said transmitter  
11 in substantially real-time.”
- 12 12. Defendant manufactures, imports into the United States, offers for sale, and/or sells the  
13 Infant Optics DXR-8 Portable Video Baby Monitor, which infringes at least Claim 12 of the  
14 '158 Patent (“Accused Product(s)”).
- 15 13. Defendant’s Accused Product(s) include, without limitation, the Accused Product(s).
- 16 14. A claim chart comparing Claim 12 of the '158 Patent to the Accused Product(s) is attached  
17 as Exhibit B.
- 18 15. The Accused Product(s) includes a baby monitoring system. *See* Exhibit B, p. 1.
- 19 16. The Accused Product(s) includes a transmitter module connected to the moveable camera  
20 that buffers and wirelessly sends the video feed supplied by the camera to an associated  
21 parent unit. *See id.*, p. 2.
- 22 17. The Accused Product(s) includes a 2.4 GHz frequency-hopping spread spectrum digital  
23 network that communicates the transmitter module and the parent unit. *See id.*, p. 3.
- 24 18. The Accused Product(s) includes the transmitter module that receives and interprets the  
25 command signal from the parent unit. *See* Exhibit B, p. 4.
- 26 19. The Accused Product(s) includes a parent unit that receives video data captured by the  
27 movable camera, via the transmitter module over the wireless network. *See id.*, p. 5.
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1 20. The Accused Product(s) includes buttons and associated software menu selections that allow  
2 the user of the of the parent unit to selectively, remotely, and digitally alter a characteristic  
3 of the video feed buffered and sent via the transmitter unit such that the parent unit sends  
4 commands to the transmitter module requiring that the video feed be delivered according to  
5 an initial digital resolution setting in real-time. *See id.*, p. 6.

6 21. The Accused Product(s) includes the parent unit that remotely activates the capture of photos  
7 and video, while the video feed is buffered and sent by the transmitter module. *See Exhibit*  
8 *B*, p. 6.

9 22. On information and belief, the operation of the transmitter module is changed when the user  
10 is given continuous control over the Accused Product. *See Exhibit B*, p. 7.

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

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

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

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18 **PRAYER FOR RELIEF**

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

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

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

25 C. For such other and further relief, as may be just and equitable.  
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**DEMAND FOR TRIAL BY JURY**

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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: October 20, 2018

Respectfully Submitted,

\_\_\_\_/s/ Nicholas Ranallo\_\_\_\_\_

Nicholas Ranallo (SBN 275016)  
nick@ranallolawoffice.com  
2443 Fillmore St., #380-7508  
San Francisco, CA 94115-  
T: (831) 607-9229  
F: (831) 533-5073  
Attorney for Plaintiff