

acts of patent infringement in the State of Delaware including by making, using, offering to sell, and/or selling Accused Products within the State of Delaware 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. 6,698,021 ("the '021 Patent"), entitled "System and Method for Remote Control of Surveillance Devices," which was duly and legally issued on February 24th, 2004 by the United States Patent and Trademark Office ("USPTO").

8. A copy of the '021 Patent is attached to this Complaint as Exhibit A.

9. The claims of the '021 Patent are valid and enforceable.

COUNT I: CLAIM FOR PATENT INFRINGEMENT **UNDER 35 U.S.C. § 271(a) ('021 PATENT)**

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

11. Claim 43 of the '021 Patent covers "a video surveillance and monitoring system, the system comprising a plurality of video monitoring devices, each monitoring device generating video monitoring data corresponding to a geographic area, wherein the plurality of video monitoring devices generate live video data and receive control instructions corresponding to a position of the video monitoring device and wherein at least two video monitoring devices of the plurality of video monitoring devices correspond to geographically distinct sites, a centralized control site in communication with the plurality of video monitoring devices via a private communication, wherein the centralized control site retrieves live video data from the plurality of video monitoring devices,

and at least one client workstation remote from the plurality of video monitoring devices and in communication with the centralized control site via public communication network, wherein the client workstation requests monitoring device data from at least one geographic area and wherein the client workstation initiates video monitoring control instructions, wherein the centralized control site associates at least one of the plurality of video monitoring devices to the client workstation requests and initializes communications between the at least one client workstation and the associated video monitoring device, wherein the client workstation cannot directly access the associated video monitoring device without an initialization by the centralized control site.”

12. Defendant manufactures, imports into the United States, offers for sale, and/or sells video surveillance systems, which infringe at least Claim 43 of the ‘021 Patent (hereafter “Accused Product(s)”).

13. Defendant’s Accused Product(s) include, without limitation the Arecont Vision System.

14. A claim chart comparing Claim 43 of the ‘021 Patent to the Accused Product(s) is attached as Exhibit B.

15. The Accused Product(s) includes a video surveillance and monitoring system. See Exhibit B, p. 1.

16. The Accused Product(s) includes multiple cameras that generate video data. See Exhibit B, p. 2.

17. The Accused Product(s) includes multiple cameras that are located in multiple sites. See Exhibit B, p. 3.

18. The Accused Product(s) includes multiple cameras that generate live and simultaneous video data. See Exhibit B, p. 4.

19. The Accused Product(s) includes cameras that are operable to receive pan, tilt, and zoom instructions. See Exhibit B, p. 5.

20. The Accused Product(s) includes cameras that are located at multiple, different sites. See Exhibit B, p. 6.

21. The Accused Product(s) distributes video streams from the camera to the clients and sends video data to client devices. See Exhibit B, p. 7 - 8.

22. The Accused Product(s) includes a remote workstation that requests video data from one or more cameras using a username and password. See Exhibit B, p. 9.

23. Each one of the elements included in the Infringing System, itemized in paragraphs 15 – 22 above, is an element in Claim 43 of the '021 Patent.

24. Plaintiff has been, and will continue to be, irreparably harmed by Defendant's ongoing infringement of the '021 Patent.

25. As a direct and proximate result of Defendant's infringement of the '021 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 '021 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 '021 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: January 15, 2019

Respectfully submitted,

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