IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

ROTHSCHILD BROADCAST DISTRIBUTION SYSTEMS, LLC	§ § §	
Plaintiff,	§ §	Case No:
vs.	§ §	PATENT CASE
Y-CAM SOLUTIONS, LLC,	§ §	JURY TRIAL DEMANDED
Defendant.	§ § §	

COMPLAINT

Plaintiff Rothschild Broadcast Distribution Systems, LLC ("Plaintiff" or "RBDS") files this Complaint against Y-Cam Solutions, LLC ("Defendant" or "Y-Cam") for infringement of United States Patent No. 8,856,221 (hereinafter "the '221 Patent").

PARTIES AND JURISDICTION

1.   This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2.   Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3.   Plaintiff is a Texas limited liability company with an office at 1400 Preston Road, Suite 400, Plano, Texas 75093.

4.   On information and belief, Defendant is a Florida corporation with a principal place of business located at 4500 140th Avenue N, Suite 101, Clearwater, FL 33762.

5.   On information and belief, this Court has personal jurisdiction over Defendant

because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6.   On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7.   Venue is proper in this District pursuant to 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO 8,856,221)

8.   Plaintiff incorporates paragraphs 1-7 herein by reference.

9.   This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

10.   Plaintiff is the owner by assignment of the '221 Patent with sole rights to enforce the '221 Patent and sue infringers.

11.   A copy of the '221 Patent, titled "System and Method for Storing Broadcast Content in a Cloud-based Computing Environment," is attached hereto as Exhibit A.

12.   The '221 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 7, of the '221 Patent by making, using, importing, selling, and/or offering for media content storage and delivery systems and services covered by one or more claims of the '221 Patent.

14.   Defendant sells, offers to sell, and/or uses media content storage and delivery

systems and services, including, without limitation, the Y-Cam system, Y-Cam security cameras, the Y-Cam app, and any similar products ("Product"), which infringe at least Claim 7 of the '221 Patent.

15.   The Product practices storing (e.g. cloud storage) media content (e.g. live and recorded video) and delivering requested media content (e.g. view live footage and recorded clips) to a consumer device. Certain aspects of these elements are illustrated in the screen shots below and/or in screen shots provided in connection with other allegations herein.

https://www.y-cam.com/

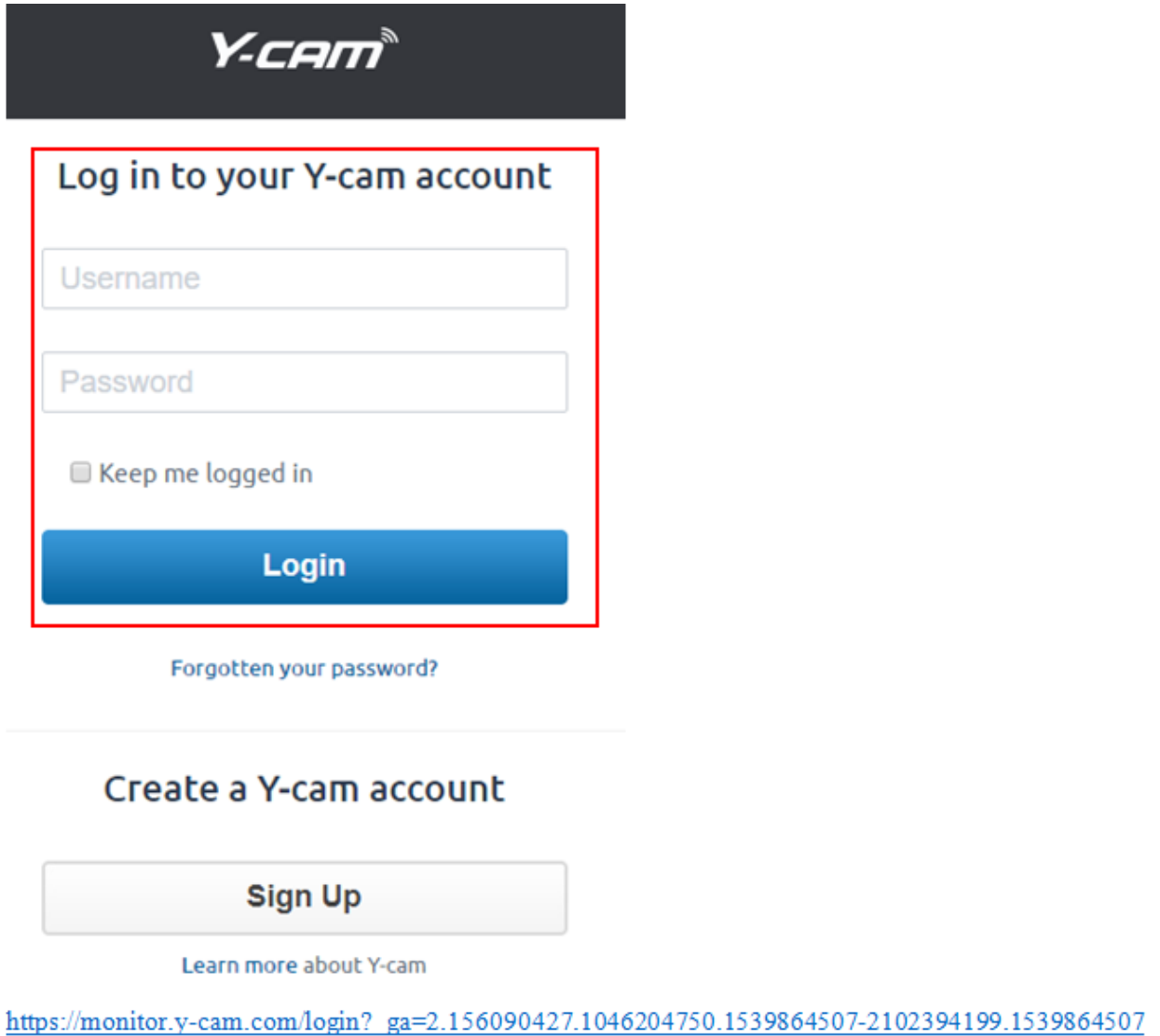https://www.trustedreviews.com/reviews/y-cam-homemonitor-hd

16.   The Product is configured to receive a request message including data indicating requested media content (e.g., the Product necessarily includes infrastructure to receive a request

to store recorded security videos or to stream recorded video on a smartphone; additionally, the request message must contain data that identifies the video to be stored or streamed) and a consumer device identifier corresponding to a consumer device (e.g., the user credentials are used to tie a smartphone/desktop and user account to particular cameras and the videos they produce). A login screen is provided to enter user credentials to access the cameras and videos they produce and after logging in, a user can view live/recorded streaming of the videos captured by the camera on the user's device (e.g. smartphone or tablet or desktop). The method includes receiving a consumer device identifier with the request message of requested media content. Certain aspects of these elements are illustrated in the screen shots below and/or in screen shots provided in connection with other allegations herein.

https://www.trustedreviews.com/reviews/y-cam-homemonitor-hd

https://monitor.y-cam.com/login?_ga=2.156090427.1046204750.1539864507-2102394199.1539864507

     17.   The Product practices determining whether the consumer device identifier (e.g. the username and password entered into the login portal) corresponds to a registered consumer device. A login portal is provided to access Y-Cam services to view live/recorded media captured from the Y-cam device. To access this media, a user must perform a login with valid username and password credentials (i.e. identifiers) which correspond to a registered consumer. Certain aspects of these elements are illustrated in the screen shots provided in connection with other allegations herein.

     18.   The Product practices determining whether the request is a storage request

message and if it is a storage request message, and then determining whether the requested media content is available for storage. Whenever there is activity in the surveillance area of a particular camera, a request message is triggered to record the video and/or images. The content is stored only if there is activity, or only if there is something to stream or record, so the Product determines whether the media content is available for storage. Also, an Internet connection is provided to transfer the video to the cloud storage, so the requested media is only available for storage when the cameras are properly connected with the Internet. Certain aspects of these elements are illustrated in the screen shots provided below and/or those provided in connection with other allegations herein.

Any movement will trigger your cameras to automatically record

If anything happens, your cameras are automatically activated[1] by the alarm system to record what's happening at the scene.

https://www.y-cam.com/

Because all footage is sent to the web, Y-Cam recommends you have an internet upload speed of at least 512Kbps (0.5Mbps) per camera for optimal usage. Not a problem for anyone on fibre optic broadband or decent ADSL, but you might want tc check your broadband speed on a speed checker if you know your internet performance is a little slow and you want to use multiple cameras.

https://www.trustedreviews.com/reviews/y-cam-homemonitor-hd

19.   The Product will initiate delivery of the requested media content to the consumer

device (e.g., stream live camera feed to a smartphone or tablet) if the request message is a content request message (e.g. request for live streaming). Once a user requests the media content (e.g., "front door" live streaming), the server initiates the delivery (e.g., live streaming) of the requested content to the consumer device. (e.g., smartphone or tablet with Y-cam app, desktop computer accessing Y-cam website, etc.). Certain aspects of these elements are illustrated in the screen shots provided below and/or those provided in connection with other allegations herein.

https://play.google.com/store/apps/details?id=com.ycam.evo&hl=en_IN

https://www.y-cam.com/

Install either the iOS or Android app and you get alerts on your smartphone every time a recording is made. The apps are easy to use and let you access a live feed at any time too. There's also a comprehensive web app that lets you configure the

https://www.trustedreviews.com/reviews/y-cam-homemonitor-hd

20.   The media data includes time data (e.g., 7 days, 30 days) that indicates a length of time (e.g., 7 days, 30 days) to store the requested media content (e.g. recorded clips are stored on a user's account for a certain time if the user has a free account and 30 days if the user has subscribed to a Y-cam plus account). The length of time to store the requested media content (e.g., recorded clips) is 7 days or 30 days as per the user's subscription. Certain aspects of these elements are illustrated in the screen shots below and/or in those provided in connection with other allegations herein.

Cameras

- **View live footage and recorded clips,** stored on your account for free* for 7 days

https://www.y-cam.com/

Plus (Monthly)

In addition to all the standard Y-cam features you get:

✓ Dual Path technology so your alarm remains connected even when your internet is down

✓ Text and Phone call alarm notifications[3]

✓ 24/7 line monitoring

✓ SIM card activation and data included

✓ 30 day alarm and video activity logs

✓ Fully managed 30 days video storage

✓ Customisable Plus Action button

✓ Permanent video storage for selected clips

✓ 1 year instant replacement

✓ Unlimited cameras

£8.33 per month

Prices exclude VAT

https://www.y-cam.com/category/plus-services/

21.   The first processor (i.e., the Product's server associated with the application/website) is further configured to determine whether the requested media content exists. The server must first determine whether the requested media content exists prior to initiating delivery in order to prevent data errors that would result from attempting to transmit media content that does not exist (e.g., the server must verify that a particular security camera is adequately connected to the Internet as to allow for video recording and streaming). Also, if the user requests certain content such as "front door" activity recording, and if there is no activity occurring, then there will be no recorded video available on the server to meet the user's request. Certain aspects of these elements are illustrated in the screen shots provided in connection with other allegations herein.

22.   After the processor determines whether the requested media content is available, it determines whether there are restrictions associated with the requested media content (e.g., subscription level, component protocols, etc.). Certain aspects of these elements are illustrated

in the screen shots provided in connection with other allegations herein.

23.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

24.   Defendant's actions complained of herein is causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

25.   Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a)   Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b)   Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receives notice of the order from further infringement of United States Patent No. 8,856,221 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c)   Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d)   Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e)   Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: February 1, 2019   Respectfully submitted,

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