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8 Attorneys for Plaintiff  
9 Pebble Tide LLC

10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

12 **Pebble Tide LLC,**

13 Plaintiff,

14 v.

15 **Logitech Inc.,**

16 Defendant.  
17

**PATENT**

**Case No. \_\_\_\_\_**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

18 Plaintiff, Pebble Tide LLC (“Pebble Tide”), through its attorney, Steven A. Nielsen,  
19 complains of Logitech Inc. (“Logitech”) and alleges the following:  
20

21 **Parties**

22 1. Plaintiff Pebble Tide LLC is a limited liability company organized and existing  
23 under the laws of Texas that maintains its principal place of business at 5570 FM423, Suite 250-  
24 2023, Frisco, TX 75036.  
25

26 2. Defendant Logitech Inc. is a corporation organized under the laws of California  
27 that maintains its principal place of business at 7700 Gateway Blvd., Newark, CA 94560.  
28

**Jurisdiction**

1  
2 3. This is an action for patent infringement arises under the patent laws of the United  
3 States, Title 35 of the United States Code.

4 4. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and  
5 1338(a).

6 5. This Court has personal jurisdiction over Logitech because it has engaged in  
7 systematic and continuous business activities in the Northern District of California and is  
8 incorporated in California. As described below, Logitech has committed acts of patent  
9 infringement giving rise to this action within this District.  
10

**Venue**

11  
12 6. Venue is proper in this Judicial District under 28 U.S.C. § 1400(b) because  
13 Logitech has committed acts of patent infringement in this District. Further, Logitech is  
14 incorporated in California. In addition, Pebble Tide has suffered harm in this District.  
15

**Patent-in-Suit**

16  
17 7. Pebble Tide is the assignee of all right, title and interest in United States Patent No.  
18 10,261,739 (the “’739 Patent,” or the “Patent-in-Suit”), including all rights to enforce and  
19 prosecute actions for infringement and to collect damages for all relevant times against infringers  
20 of the Patent-in-Suit. Accordingly, Pebble Tide possesses the exclusive right and standing to  
21 prosecute the present action for infringement of the Patent-in-Suit by Logitech.  
22

**THE ’739 PATENT**

23  
24 8. On April 16, 2019, the United States Patent and Trademark Office issued the ’739  
25 Patent. The ’739 Patent is titled “System for Capturing and Outputting Digital Content Over a  
26 Network that Includes the Internet.” The application leading to the ’739 Patent was filed on March  
27 15, 2018 and is a continuation of U.S. Application No. 09/992,413, which was filed on November  
28

1 18, 2001; which claims priority from U.S. Provisional Application 60/252,682, which was filed on  
2 November 20, 2000. A true and correct copy of the '739 Patent is attached hereto as Exhibit A.

3 9. The '739 Patent is valid and enforceable.

4 10. The invention claimed in the '739 Patent relates to the transmission of digital  
5 content to an output device from some computing device regardless of the processing power,  
6 display screen size, and memory space of the computing device. Ex. A at 1:18–23.

7 11. A certificate of correction for the '739 Patent was filed on April 16, 2019. A true  
8 and correct copy of the certificate of correction is attached hereto as Exhibit B.  
9

10 **COUNT I: INFRINGEMENT OF THE '739 PATENT**

11 12. Pebble Tide incorporates the above paragraphs herein by reference.

12 13. **Direct Infringement.** Logitech has been and continues to directly infringe one or  
13 more claims of the '739 Patent in at least this District by making, using, testing, offering to sell,  
14 selling and/or importing, without limitation, at least the Circle 2 Security Camera (“Exemplary  
15 Logitech Products”) that infringes at least exemplary claim 1 of the '739 Patent (the “Exemplary  
16 '739 Patent Claim”) literally or by the doctrine of equivalence. On information and belief,  
17 numerous other systems, services, and/or devices that infringe the claims of the Patent-in-Suit  
18 have been made, used, sold, imported, and offered for sale by Logitech and/or its customers.  
19

20 14. **Induced Infringement.** Logitech actively, knowingly, and intentionally has been  
21 and continues to induce infringement of the '739 Patent, literally or by the doctrine of equivalence,  
22 by selling Exemplary Logitech Products to their customers for explicit use in end-user products in  
23 a manner that infringes one or more claims of the '739 Patent.  
24

25 15. **Contributory Infringement.** Logitech actively, knowingly, and intentionally has  
26 been and continues materially contribute to their own customers’ infringement of the '739 Patent,  
27 literally or by the doctrine of equivalence, by selling Exemplary Logitech Products to their  
28

1 customers for use in end-user products in a manner that infringes one or more claims of the '739  
2 Patent.

3 16. The filing of this Complaint constitutes notice in accordance with 35 U.S.C. § 287.

4 17. Despite such notice, Logitech continues to make, use, test, sell, offer for sale,  
5 market, and/or import into the United States, products that infringe the '739 Patent. On  
6 information and belief, Logitech has also continued to sell the Exemplary Logitech Products and  
7 distribute product literature and website materials inducing end users and others to use its products  
8 in the customary and intended manner that infringes the '739 Patent. Thus, on information and  
9 belief, Logitech is contributing to and/or inducing the infringement of the '739 Patent.  
10

11 18. Exhibit C includes charts comparing the Exemplary '739 Patent Claim to the Circle  
12 2 Security Camera. As set forth in these charts, this Exemplary Logitech Product practices the  
13 technology claimed by the '739 Patent. Accordingly, the Exemplary Logitech Products  
14 incorporated in these charts satisfy all elements of the Exemplary '739 Patent Claim.  
15

16 19. Pebble Tide therefore incorporates by reference in its allegations herein the claim  
17 charts of Exhibit C.

18 20. Pebble Tide is entitled to recover damages adequate to compensate for Logitech  
19 infringement.  
20

### 21 **Jury Demand**

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

### 24 **Prayer for Relief**

25 WHEREFORE, Pebble Tide respectfully requests the following relief:

26 A. A judgment that the '739 Patent is valid and enforceable.  
27  
28

- 1 B. A judgment that Logitech has infringed, contributorily infringed, and/or induced  
2 infringement of one or more claims of the '739 Patent;
- 3 C. An accounting of all damages not presented at trial;
- 4 D. A judgment that awards Pebble Tide all appropriate damages under 35 U.S.C. § 284  
5 for Logitech's past infringement, and any continuing or future infringement of the  
6 Patent-in-Suit, up until the date such judgment is entered, including pre- or post-  
7 judgment interest, costs, and disbursements as justified under 35 U.S.C. § 284 and,  
8 if necessary, to adequately compensate Pebble Tide for Logitech's infringement, an  
9 accounting:
- 10
- 11 i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and  
12 that Pebble Tide be awarded its reasonable attorneys' fees against Logitech that  
13 it incurs in prosecuting this action;
- 14 ii. an accounting of all damages not presented at trial;
- 15 iii. that Pebble Tide be awarded costs, and expenses that it incurs in prosecuting this  
16 action; and
- 17 iv. that Pebble Tide be awarded such further relief at law or in equity as the Court  
18 deems just and proper.  
19

20 Respectfully submitted,

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