IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Cedar Lane Technologies Inc., Plaintiff, v. **Advert Tech (USA) , LLC,** Defendant.	Case No. _____ Patent Case Jury Trial Demanded

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Cedar Lane Technologies Inc. ("Cedar Lane"), through its attorneys, complains of Advert Tech (USA) , LLC ("Advert Tech"), and alleges the following:

PARTIES

1. Plaintiff Cedar Lane Technologies Inc. is a corporation organized and existing under the laws of Canada and maintains its principal place of business at 560 Baker Street, Suite 1, Nelson, BC V1L 4H9.

2. Defendant Advert Tech (USA) , LLC is a corporation organized and existing under the laws of Illinois that maintains its principal place of business at 2723 W Devon Ave, Part 2, Chicago, IL 60659.

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 Advert Tech because it has engaged in systematic and continuous business activities in the Northern District of Illinois and is incorporated in Illinois. As described below, Advert Tech has committed acts of patent infringement giving rise to this action within this District.

VENUE

6. Venue is proper in this District under 28 U.S.C. § 1400(b) because Advert Tech has committed acts of patent infringement in this District, is incorporated in the state of Illinois, and has a principle place of business in Chicago, Illinois. In addition, Cedar Lane has suffered harm in this district.

PATENTS-IN-SUIT

7. Cedar Lane is the assignee of all right, title and interest in United States Patent Nos. 6,473,527 (the "'527 Patent"); 6,972,790 (the "'790 Patent"); and 8,537,242 (the "'242 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, Cedar Lane possesses the exclusive right and standing to prosecute the present action for infringement of the Patents-in-Suit by Advert Tech.

The '527 Patent

8. The '527 Patent is entitled "Module and method for interfacing analog/digital converting means and JPEG compression means," and issued October 29, 2002. The application leading to the '527 Patent was filed on June 1, 1999. A true and correct copy of the '527 Patent is attached hereto as Exhibit A and incorporated herein by reference.

9. The '527 Patent is valid and enforceable.

The '790 Patent

10. The ’790 Patent is entitled “Host interface for imaging arrays,” and issued December 6, 2005. The application leading to the ’790 Patent was filed on December 21, 2000, which claims priority from provisional application number 60/177,496 filed on January 21, 2000. A true and correct copy of the ’790 Patent is attached hereto as Exhibit B and incorporated herein by reference.

11. The ’790 Patent is valid and enforceable.

The ’242 Patent

12. The ’242 Patent is entitled “Host interface for imaging arrays,” and issued September 17, 2013. The application leading to the ’242 Patent was filed on October 27, 2005, which claims priority from provisional application number 60/177,496 filed January 21, 2000. A true and correct copy of the ’242 Patent is attached hereto as Exhibit C and incorporated herein by reference.

13. The ’242 Patent is valid and enforceable.

COUNT I: INFRINGEMENT OF THE ’527 PATENT

14. Cedar Lane incorporates the above paragraphs herein by reference.

15. **Direct Infringement.** Advert Tech has been and continues to directly infringe one or more claims of the ’527 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Ex++ Series Network Cameras (e.g., the Long Range Bullet Camera[1]) (“Exemplary Advert Tech Products”) that infringe at least exemplary claim 8 of the ’527 Patent (the “Exemplary ’527 Patent Claims”) literally or by the doctrine of equivalence. On information and belief, numerous other devices that infringe the

[1] Product page for the Long Range Bullet Camera is available at http://www.adverttech.com/index.php?m=content&c=index&a=show&catid=95&id=313.

claims of the Patents-in-Suit have been made, used, sold, imported, and offered for sale by Advert Tech and/or its customers.

16. The filing of this Complaint constitutes notice and actual knowledge of infringement in accordance with 35 U.S.C. § 287.

17. Despite such actual knowledge of infringement, Advert Tech continues to make, use, test, sell, offer for sale, market, and/or import into the United States, products that infringe the ’527 Patent. On information and belief, Advert Tech has also continued to sell the Exemplary Advert Tech Products and distribute product literature and website materials inducing end users and others to use its products in the customary and intended manner that infringes the ’527 Patent. Thus, on information and belief, Advert Tech is contributing to and/or inducing the infringement of the ’527 Patent with actual knowledge that the ’527 Patent is being infringed in this manner.

18. **Induced Infringement.** Advert Tech actively, knowingly, and intentionally has been and continues to induce infringement of the ’527 Patent, literally or by the doctrine of equivalence, by selling Exemplary Advert Tech Products to their customers for use in end-user products in a manner that infringes one or more claims of the ’527 Patent.

19. **Contributory Infringement.** Advert Tech actively, knowingly, and intentionally has been and continues materially contribute to their own customers’ infringement of the ’527 Patent, literally or by the doctrine of equivalence, by selling Exemplary Advert Tech Products to their customers for use in end-user products in a manner that infringes one or more claims of the ’527 Patent.

20. Exhibit D includes charts comparing the Exemplary ’527 Patent Claims to the Exemplary Advert Tech Products. As set forth in these charts, this Exemplary Advert Tech

Products practices the technology claimed by the ’527 Patent. Accordingly, the Exemplary Advert Tech Products incorporated in these charts satisfy all elements of the Exemplary ’527 Patent Claims.

21. Cedar Lane therefore incorporates by reference in its allegations herein the claim charts of Exhibit D.

22. Cedar Lane is entitled to recover damages adequate to compensate for Advert Tech’s infringement.

COUNT II: INFRINGEMENT OF THE ’790 PATENT

23. Cedar Lane incorporates the above paragraphs herein by reference.

24. **Direct Infringement.** Advert Tech has been and continues to directly infringe one or more claims of the ’790 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Exemplary Advert Tech Products that infringe at least exemplary claim 1 of the ’790 Patent (the “Exemplary ’790 Patent Claims”) literally or by the doctrine of equivalence. On information and belief, numerous other devices that infringe the claims of the Patents-in-Suit have been made, used, sold, imported, and offered for sale by Advert Tech and/or its customers.

25. The filing of this Complaint constitutes notice and actual knowledge of infringement in accordance with 35 U.S.C. § 287.

26. Despite such actual knowledge of infringement, Advert Tech continues to make, use, test, sell, offer for sale, market, and/or import into the United States, products that infringe the ’790 Patent. On information and belief, Advert Tech has also continued to sell the Exemplary Advert Tech Products and distribute product literature and website materials inducing end users and others to use its products in the customary and intended manner that infringes the ’790

Patent. Thus, on information and belief, Advert Tech is contributing to and/or inducing the infringement of the ’790 Patent with actual knowledge that the ’790 Patent is being infringed in this manner.

27. **Induced Infringement.** Advert Tech actively, knowingly, and intentionally has been and continues to induce infringement of the ’790 Patent, literally or by the doctrine of equivalence, by selling Exemplary Advert Tech Products to their customers for use in end-user products in a manner that infringes one or more claims of the ’790 Patent.

28. **Contributory Infringement.** Advert Tech actively, knowingly, and intentionally has been and continues materially contribute to their own customers’ infringement of the ’790 Patent, literally or by the doctrine of equivalence, by selling Exemplary Advert Tech Products to their customers for use in end-user products in a manner that infringes one or more claims of the ’790 Patent.

29. Exhibit E includes charts comparing the Exemplary ’790 Patent Claims to the Exemplary Advert Tech Products. As set forth in these charts, this Exemplary Advert Tech Products practices the technology claimed by the ’790 Patent. Accordingly, the Exemplary Advert Tech Products incorporated in these charts satisfy all elements of the Exemplary ’790 Patent Claims.

30. Cedar Lane therefore incorporates by reference in its allegations herein the claim charts of Exhibit E.

31. Cedar Lane is entitled to recover damages adequate to compensate for Advert Tech’s infringement.

COUNT III: INFRINGEMENT OF THE ’242 PATENT

32. Cedar Lane incorporates the above paragraphs herein by reference.

33. **Direct Infringement.** Advert Tech has been and continues to directly infringe one or more claims of the ’242 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Exemplary Advert Tech Products that infringe at least exemplary claims 1 and 8 of the ’242 Patent (the “Exemplary ’242 Patent Claims”) literally or by the doctrine of equivalence. On information and belief, numerous other devices that infringe the claims of the Patents-in-Suit have been made, used, sold, imported, and offered for sale by Advert Tech and/or its customers.

34. The filing of this Complaint constitutes notice and actual knowledge of infringement in accordance with 35 U.S.C. § 287.

35. Despite such actual knowledge of infringement, Advert Tech continues to make, use, test, sell, offer for sale, market, and/or import into the United States, products that infringe the ’242 Patent. On information and belief, Advert Tech has also continued to sell the Exemplary Advert Tech Products and distribute product literature and website materials inducing end users and others to use its products in the customary and intended manner that infringes the ’242 Patent. Thus, on information and belief, Advert Tech is contributing to and/or inducing the infringement of the ’242 Patent with actual knowledge that the ’242 Patent is being infringed in this manner.

36. **Induced Infringement.** Advert Tech actively, knowingly, and intentionally has been and continues to induce infringement of the ’242 Patent, literally or by the doctrine of equivalence, by selling Exemplary Advert Tech Products to their customers for use in end-user products in a manner that infringes one or more claims of the ’242 Patent.

37. **Contributory Infringement.** Advert Tech actively, knowingly, and intentionally has been and continues materially contribute to their own customers’ infringement of the ’242

Patent, literally or by the doctrine of equivalence, by selling Exemplary Advert Tech Products to their customers for use in end-user products in a manner that infringes one or more claims of the ’242 Patent.

38. Exhibit F includes charts comparing the Exemplary ’242 Patent Claims to the Exemplary Advert Tech Products. As set forth in these charts, this Exemplary Advert Tech Products practices the technology claimed by the ’242 Patent. Accordingly, the Exemplary Advert Tech Products incorporated in these charts satisfy all elements of the Exemplary ’242 Patent Claims.

39. Cedar Lane therefore incorporates by reference in its allegations herein the claim charts of Exhibit F.

40. Cedar Lane is entitled to recover damages adequate to compensate for Advert Tech’s infringement.

JURY DEMAND

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

PRAYER FOR RELIEF

WHEREFORE, Cedar Lane respectfully requests the following relief:

A. A judgment that the ’527 Patent, the ’790 Patent, and the ’242 Patent are valid and enforceable.

B. A judgment that Advert Tech has infringed, contributorily infringed, and/or induced infringement of one or more claims of the ’527 Patent;

C. A judgment that Advert Tech has infringed, contributorily infringed, and/or induced infringement of one or more claims of the ’790 Patent;

D. A judgment that Advert Tech has infringed, contributorily infringed, and/or induced infringement of one or more claims of the '242 Patent;

E. An accounting of all damages not presented at trial;

F. A judgment that awards Cedar Lane all appropriate damages under 35 U.S.C. § 284 for Advert Tech's past infringement, and any continuing or future infringement of the Patents-in-Suit, up until the date such judgment is entered, including pre- or post-judgment interest, costs, and disbursements as justified under 35 U.S.C. § 284 and, if necessary, to adequately compensate Cedar Lane for Advert Tech's infringement, an accounting:

i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and that Cedar Lane be awarded its reasonable attorneys' fees against Advert Tech that it incurs in prosecuting this action;

ii. that Cedar Lane be awarded costs, and expenses that it incurs in prosecuting this action; and

iii. that Cedar Lane be awarded such further relief at law or in equity as the Court deems just and proper.

Dated: May 22, 2019

Respectfully submitted,

/s/ Isaac Rabicoff

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