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

DISPLAY TECHNOLOGIES, LLC, a §
Texas limited liability company, §
§
     Plaintiff, §   Case No: 6:20-cv-1405-Or1-37EJK
§
vs. §   PATENT CASE
§
NAMSUNG AMERICA, INC., a Florida §
corporation, §   **Jury Trial Requested**
§
     Defendant. §
_____ §

COMPLAINT

Plaintiff Display Technologies, LLC ("Plaintiff" or "Display") files this Complaint

against Namsung America, Inc. ("Defendant" or "Namsung") for infringement of United States

Patent No. 9,300,723 (the " '723 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 a place of business at 1801 NE

123rd Street, Suite 314, North Miami, FL 33161.

4.   On information and belief, Defendant is a Florida corporation with a principal

office address of 250 International Pkwy., Suite 230, Heathrow, FL 32746. On information and

belief, Defendant may be served through its registered agent, NISI Law Firm, P.A., at 2003

Longwood Lake Mary Rd., Suite 1001, Longwood, FL 32750.

5.   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.   Upon 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.   On information and belief, venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District. Alternatively, acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 9,300,723)

8.   Plaintiff incorporates paragraphs 1 through 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 '723 Patent with sole rights to enforce the '723 Patent and sue infringers.

11.   A copy of the '723 Patent, titled "Enabling social interactive wireless communications," is attached hereto as Exhibit A.

12.   The '723 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13.   Defendant has infringed and continues to infringe one or more claims, including

at least Claim 12 of the '723 Patent by making, using, and/or selling media systems covered by one or more claims of the '723 Patent. For example, Defendant makes, uses, and/or sells the Dual Electronic Car Infotainment System, and any similar products ("Product"). Defendant has infringed and continues to infringe the '723 Patent in violation of 35 U.S.C. § 271.

14.   Regarding Claim 12, the Product is configured to receive a media file (e.g., music file or songs video) from a wireless mobile device (e.g., mobile phone) over a communication network (e.g. Bluetooth network). The wireless mobile device (e.g., mobile phone) sends data (e.g., music file) to the media system. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: http://www.dualav.com/mobilevideo/dmcpa11bt.php
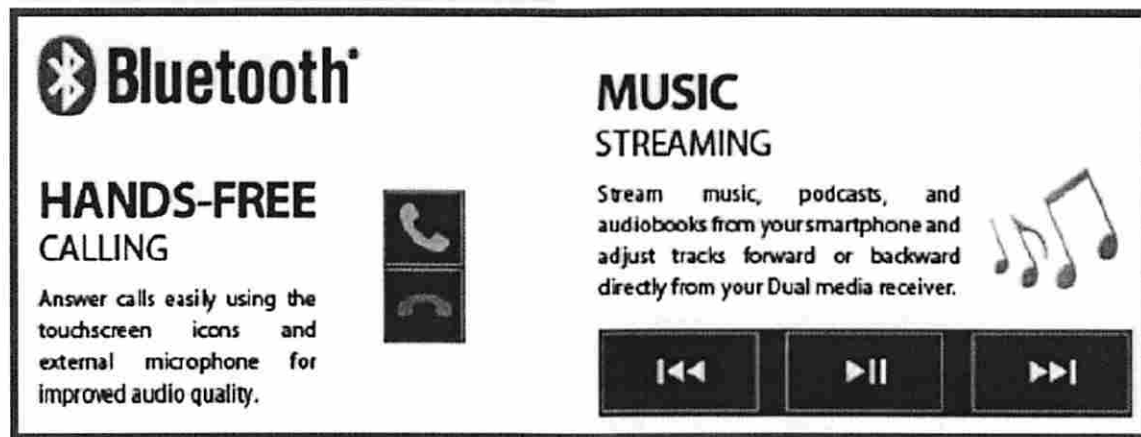
15.   The Product includes a wireless receiver (e.g., Bluetooth receiver).   Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.
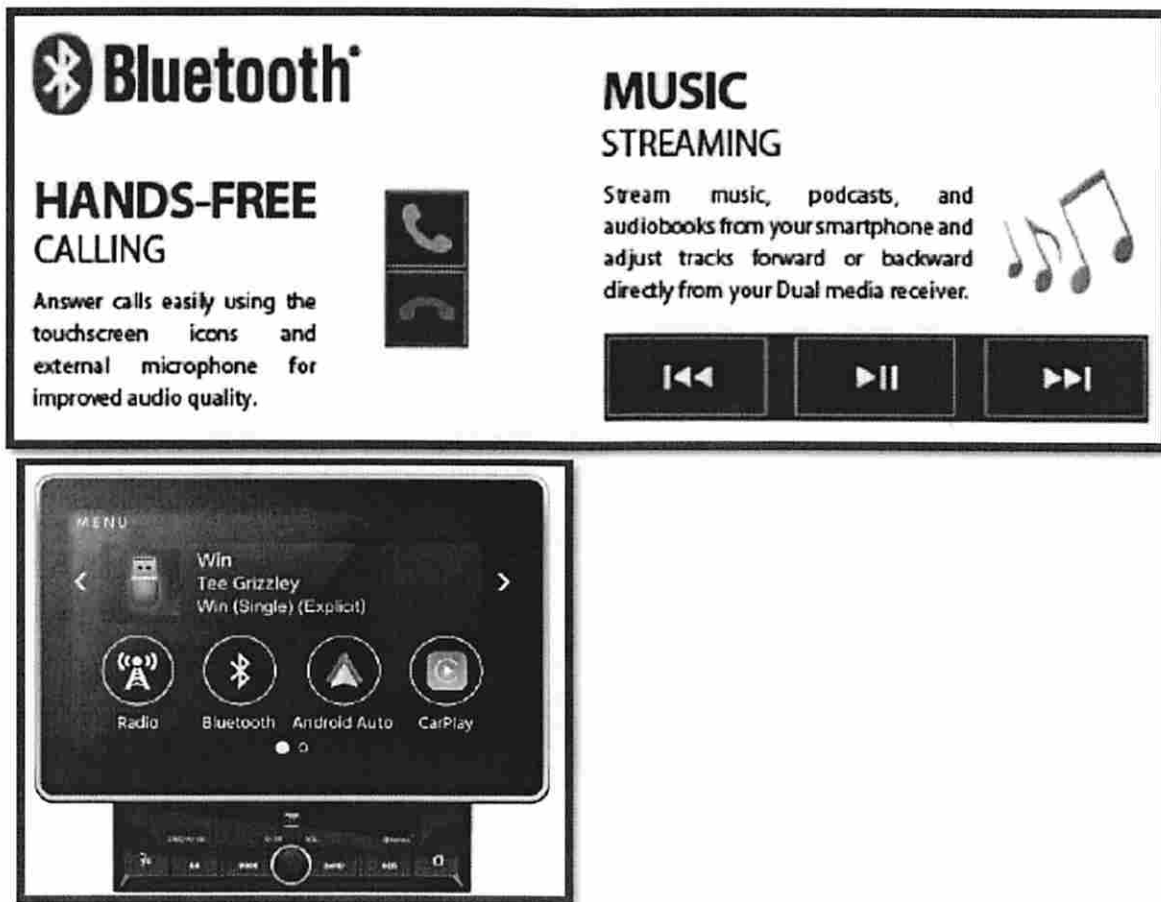
The Defendant uses a wireless receiver (e.g. Bluetooth) to play music and video from mobile..

Source: http://www.dualav.com/mobilevideo/dmcpa11bt.php

16.   The Product includes a security measure.   For example, the Product must paired and connected by inputting a password (i.e., a security measure) to a wireless mobile device (e.g. mobile phone) before receiving a media file. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Bluetooth Operation

Press the DEVICES to show the pairing device list. To connect to a previously connected device. press the current device name. Any previously connected devices that are in rang will be listed by their device name. Press the desired device name to disconnect from the current device and connect to the new device.

Before you can use a Bluetooth device to make hands-free calls or stream audio. it must be authenticated. This is also referred to as "pairing" a device.

The unit broadcasts the pairing signal constantly when no devices are currently connected. Complete the pairing sequence from your Bluetooth device. Refer to the owner's manual for your device for more details. **The device name is "DMCPA11BT". The unit can be in any mode of operation when pairing is performed. On certain phones. pairing may need to be done more than once.**

The Defendant has security measures .(i.e. the device must be Authenticated.)

Source: http://www.dualav.com/support/manuals/dmcpa11bt.pdf

17.   The Product is disposed in an accessible relation to at least one interactive computer network (e.g., Bluetooth network) that has a wireless range structured to permit authorized access (e.g., via pairing code) to said at least one interactive computer network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

> Before you can use a Bluetooth device to make hands-free calls or stream audio. it must be authenticated. This is also referred to as "pairing" a device.
>
> The unit broadcasts the pairing signal constantly when no devices are currently connected. Complete the pairing sequence from your Bluetooth device. Refer to the owner's manual for your device for more details. **The device name is "DMCPA11BT".** The unit can be in any mode of operation when pairing is performed. On certain phones. pairing may need to be done more than once.

Source: http://www.dualav.com/mobilevideo/dmcpa11bt.php
Source: http://www.dualav.com/support/manuals/dmcpa11bt.pdf

18.   When the wireless mobile device is within the wireless range, the wireless mobile device is detectable by the media system (e.g., the media system automatically detects a smartphone when the mobile device is within Bluetooth range). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Bluetooth Operation

Press the DEVICES to show the pairing device list. To connect to a previously connected device. press the current device name. Any previously connected devices that are in rang will be listed by their device name. Press the desired device name to disconnect from the current device and connect to the new device.

Media system (Car infotainment system) will automatically detect nearby (i.e. within range) Bluetooth in which mobile device is connected so that media system can detect mobile device.

Source: http://www.dualav.com/mobilevideo/dmcpa11bt.php
Source: http://www.dualav.com/support/manuals/dmcpa11bt.pdf

19.   At least one digital media file (e.g., music file) is initially disposed on the wireless mobile device (e.g., the mobile phone includes one or more music files). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: http://www.dualav.com/mobilevideo/dmcpa11bt.php

20.   The media system is structured to detect the wireless mobile device disposed within the wireless range (e.g., media system automatically detects the mobile phone when it is within Bluetooth range). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Bluetooth Operation

Press the DEVICES to show the pairing device list. To connect to a previously connected device. press the current device name. Any previously connected devices that are in rang will be listed by their device name. Press the desired device name to disconnect from the current device and connect to the new device.

When Bluetooth is On and a Bluetooth device is being paired. the indicator will flash. When Bluetooth is On and a phone is connected to the unit. the indicator will illuminate steady.

Source: http://www.dualav.com/mobilevideo/dmcpa11bt.php
Source: http://www.dualav.com/support/manuals/dmcpa11bt.pdf

21.   A communication link (e.g., Bluetooth) is structured to dispose the media system and the wireless mobile device (e.g. mobile phone) in a communicative relation with one another via the at least one interactive computer network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.
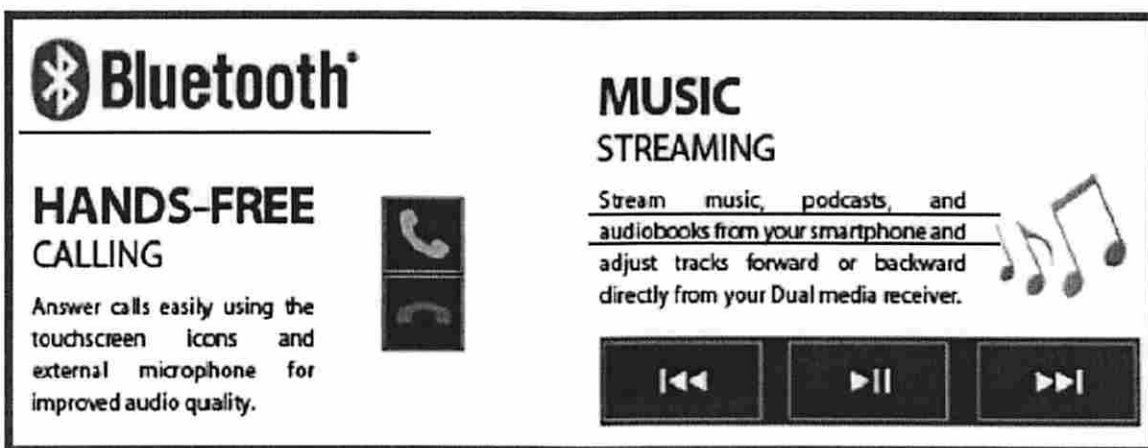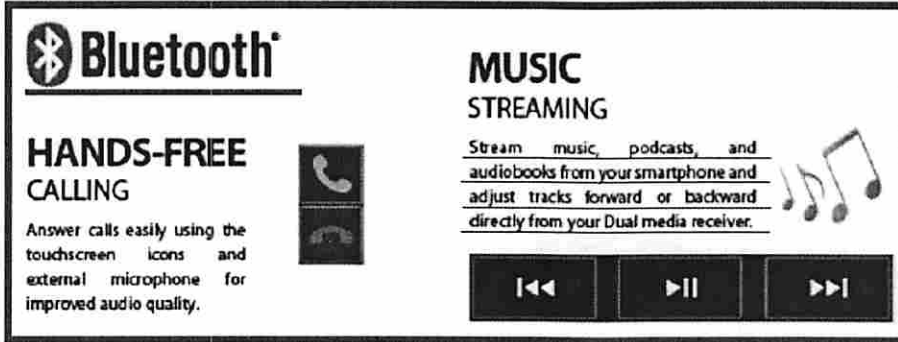
22.   The communication link is initiated by the media system. The devices will automatically connect when the units are in range. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

When Bluetooth is On and a Bluetooth device is being paired, the indicator will flash. When Bluetooth is On and a phone is connected to the unit, the indicator will illuminate steady.

Bluetooth

MUSIC
STREAMING

HANDS-FREE
CALLING

Answer calls easily using the touchscreen icons and external microphone for improved audio quality.

Stream music, podcasts, and audiobooks from your smartphone and adjust tracks forward or backward directly from your Dual media receiver.

| I◄◄ | ►II | ►►I |

Source: http://www.dualav.com/mobilevideo/dmcpa11bt.php
Source: http://www.dualav.com/support/manuals/dmcpa11bt.pdf

23.   The wireless mobile device and the media system are structured to transmit the at least one digital media file there between via the communication link (e.g., media system allows for the transmission of files between itself and the wireless mobile device; e.g., the mobile device transmits the music file to the media system). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

24.   The communication link is structured to bypass the security measure of the media system for a limited permissible use of the communication link by the wireless mobile device for only transferring the at least one digital media file to, and displaying the at least one digital media file on, the media system (e.g., the media system bypasses the security measure of the Bluetooth network). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

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

26.   Defendant's actions complained of herein are 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.

27.   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 receive notice of the order from further infringement of United States Patent No. 9,300,723 (or, in the alternative, awarding Plaintiff running royalties 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.

Plaintiff requests a jury for all claims so triable.

Dated: August 4, 2020   Respectfully submitted,

EDWARD O'CONNOR
Florida Bar No. 132223
AVYNO LAW, P.C.
6345 Balboa Blvd., Suite 208, Bldg. 1
Encino, California 91316
Tel: (949) 291-2894
Fax: (818) 332-4205
efo@avynolaw.com

OF COUNSEL:

JAY JOHNSON *(Pro Hac Vice Application Pending)*
Texas Bar No. 24067322
KIZZIA JOHNSON, PLLC
1910 Pacific Ave., Suite 13000
Dallas, Texas 75201
(214) 451-0164
Fax: (214) 451-0165
jay@kjpllc.com

ATTORNEYS FOR PLAINTIFF