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14 **Attorneys for Plaintiff**
15 **Richman Technology Corporation**

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **LOS ANGELES DIVISION**

19 **Richman Technology Corporation,**
20 Plaintiff,
21 v.
22 **Hikvision USA Inc.,**
23 Defendant.

24 Case No. _____

25 **COMPLAINT FOR**

26 **(1) Infringement of the '698 Patent**

27 **(2) Infringement of the '933 Patent**

28 **(3) Infringement of the '484 Patent**

DEMAND FOR JURY TRIAL

1 Plaintiff Richman Technology Corporation (“Plaintiff”), through its attorneys,
2 complains of Hikvision USA Inc. (“Defendant”), and alleges the following:

3 **PARTIES**

4
5 1. Plaintiff Richman Technology Corporation is a corporation organized
6 and existing under the laws of Delaware that maintains its principal place of business
7 at 7840 Mission Center Ct, San Diego, CA 92108.

8
9 2. Defendant Hikvision USA Inc. is a corporation organized and existing
10 under the laws of California that maintains an established place of business at 18639
11 Railroad St, City of Industry, CA 91748.

12 **JURISDICTION**

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14 3. This is an action for patent infringement arising under the patent laws of
15 the United States, Title 35 of the United States Code.

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17 4. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§
18 1331 and 1338(a).

19
20 5. This Court has personal jurisdiction over Defendant because it has
21 engaged in systematic and continuous business activities in this District, and is
22 incorporated in this District’s state. As described below, Defendant has committed
23 acts of patent infringement giving rise to this action within this District.

24 **VENUE**

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26 6. Venue is proper in this District under 28 U.S.C. § 1400(b) because
27 Defendant has committed acts of patent infringement in this District, has an
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1 established place of business in this District, and is incorporated in this District's
2 state. In addition, Plaintiff has suffered harm in this district.

3
4 **PATENTS-IN-SUIT**

5 7. Plaintiff is the assignee of all right, title and interest in United States
6 Patent Nos. 8,350,698 (the "'698 Patent"); 8,981,933 (the "'933 Patent"); 9,449,484
7 (the "'484 Patent"); (collectively the "Patents-in-Suit"); including all rights to enforce
8 and prosecute actions for infringement and to collect damages for all relevant times
9 against infringers of the Patents-in-Suit. Accordingly, Plaintiff possesses the
10 exclusive right and standing to prosecute the present action for infringement of the
11 Patents-in-Suit by Defendant.
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14 **THE '698 PATENT**

15 8. The '698 Patent is entitled "Method and protocol for real time security
16 system," and issued 1/8/2013. The application leading to the '698 Patent was filed on
17 6/30/2011. A true and correct copy of the '698 Patent is attached hereto as Exhibit 1
18 and incorporated herein by reference.
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21 9. The '698 Patent is valid and enforceable.

22 **THE '933 PATENT**

23 10. The '933 Patent is entitled "System for real time security monitoring,"
24 and issued 3/17/2015. The application leading to the '933 Patent was filed on
25 12/28/2012. A true and correct copy of the '933 Patent is attached hereto as Exhibit 2
26 and incorporated herein by reference.
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1 11. The '933 Patent is valid and enforceable.

2 **THE '484 PATENT**

3 12. The '484 Patent is entitled "System for real time security monitoring,"
4 and issued 9/20/2016. The application leading to the '484 Patent was filed on
5 2/17/2015. A true and correct copy of the '484 Patent is attached hereto as Exhibit 3
6 and incorporated herein by reference.
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8 13. The '484 Patent is valid and enforceable.

9 **COUNT 1: INFRINGEMENT OF THE '698 PATENT**

10 14. Plaintiff incorporates the above paragraphs herein by reference.

11 15. **Direct Infringement.** Defendant has been and continues to directly
12 infringe one or more claims of the '698 Patent in at least this District by making,
13 using, offering to sell, selling and/or importing, without limitation, at least the
14 Defendant products identified in the charts incorporated into this Count below
15 (among the "Exemplary Defendant Products") that infringe at least the exemplary
16 claims of the '698 Patent also identified in the charts incorporated into this Count
17 below (the "Exemplary '698 Patent Claims") literally or by the doctrine of
18 equivalents. On information and belief, numerous other devices that infringe the
19 claims of the '698 Patent have been made, used, sold, imported, and offered for sale
20 by Defendant and/or its customers.
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1 16. Defendant also has and continues to directly infringe, literally or under
2 the doctrine of equivalents, the Exemplary '698 Patent Claims, by having its
3 employees internally test and use these Exemplary Products.
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5 17. The service of this Complaint upon Defendant constitutes actual
6 knowledge of infringement as alleged here.
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8 18. Despite such actual knowledge, Defendant continues to make, use, test,
9 sell, offer for sale, market, and/or import into the United States, products that infringe
10 the '698 Patent. On information and belief, Defendant has also continued to sell the
11 Exemplary Defendant Products and distribute product literature and website materials
12 inducing end users and others to use its products in the customary and intended
13 manner that infringes the '698 Patent. Thus, on information and belief, Defendant is
14 contributing to and/or inducing the infringement of the '698 Patent.
15
16

17 19. **Induced Infringement.** Defendant actively, knowingly, and
18 intentionally has been and continues to induce infringement of the '698 Patent,
19 literally or by the doctrine of equivalents, by selling Exemplary Defendant Products
20 to their customers for use in end-user products in a manner that infringes one or more
21 claims of the '698 Patent.
22

23 20. **Contributory Infringement.** Defendant actively, knowingly, and
24 intentionally has been and continues materially contribute to their own customers'
25 infringement of the '698 Patent, literally or by the doctrine of equivalents, by selling
26 Exemplary Defendant Products to their customers for use in end-user products in a
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1 manner that infringes one or more claims of the '698 Patent. Moreover, the
2 Exemplary Defendant Products are not a staple article of commerce suitable for
3 substantial noninfringing use.
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5 21. Exhibit 4 includes charts comparing the Exemplary '698 Patent Claims
6 to the Exemplary Defendant Products. As set forth in these charts, the Exemplary
7 Defendant Products practice the technology claimed by the '698 Patent.
8 Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy
9 all elements of the Exemplary '698 Patent Claims.
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11 22. Plaintiff therefore incorporates by reference in its allegations herein the
12 claim charts of Exhibit 4.
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14 23. Plaintiff is entitled to recover damages adequate to compensate for
15 Defendant's infringement.
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17 **COUNT 2: INFRINGEMENT OF THE '933 PATENT**

18 24. Plaintiff incorporates the above paragraphs herein by reference.

19 25. **Direct Infringement.** Defendant has been and continues to directly
20 infringe one or more claims of the '933 Patent in at least this District by making,
21 using, offering to sell, selling and/or importing, without limitation, at least the
22 Defendant products identified in the charts incorporated into this Count below
23 (among the "Exemplary Defendant Products") that infringe at least the exemplary
24 claims of the '933 Patent also identified in the charts incorporated into this Count
25 below (the "Exemplary '933 Patent Claims") literally or by the doctrine of
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1 equivalents. On information and belief, numerous other devices that infringe the
2 claims of the '933 Patent have been made, used, sold, imported, and offered for sale
3 by Defendant and/or its customers.
4

5 26. Defendant also has and continues to directly infringe, literally or under
6 the doctrine of equivalents, the Exemplary '933 Patent Claims, by having its
7 employees internally test and use these Exemplary Products.
8

9 27. The service of this Complaint upon Defendant constitutes actual
10 knowledge of infringement as alleged here.
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12 28. Despite such actual knowledge, Defendant continues to make, use, test,
13 sell, offer for sale, market, and/or import into the United States, products that infringe
14 the '933 Patent. On information and belief, Defendant has also continued to sell the
15 Exemplary Defendant Products and distribute product literature and website materials
16 inducing end users and others to use its products in the customary and intended
17 manner that infringes the '933 Patent. Thus, on information and belief, Defendant is
18 contributing to and/or inducing the infringement of the '933 Patent.
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21 29. Induced Infringement. Defendant actively, knowingly, and intentionally
22 has been and continues to induce infringement of the '933 Patent, literally or by the
23 doctrine of equivalents, by selling Exemplary Defendant Products to their customers
24 for use in end-user products in a manner that infringes one or more claims of the '933
25 Patent.
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1 30. **Contributory Infringement.** Defendant actively, knowingly, and
2 intentionally has been and continues materially contribute to their own customers'
3 infringement of the '933 Patent, literally or by the doctrine of equivalents, by selling
4 Exemplary Defendant Products to their customers for use in end-user products in a
5 manner that infringes one or more claims of the '933 Patent. Moreover, the
6 Exemplary Defendant Products are not a staple article of commerce suitable for
7 substantial noninfringing use.
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10 31. Exhibit 5 includes charts comparing the Exemplary '933 Patent Claims
11 to the Exemplary Defendant Products. As set forth in these charts, the Exemplary
12 Defendant Products practice the technology claimed by the '933 Patent.
13 Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy
14 all elements of the Exemplary '933 Patent Claims.
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17 32. Plaintiff therefore incorporates by reference in its allegations herein the
18 claim charts of Exhibit 5.
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20 33. Plaintiff is entitled to recover damages adequate to compensate for
21 Defendant's infringement.
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23 **COUNT 3: INFRINGEMENT OF THE '484 PATENT**

24 34. Plaintiff incorporates the above paragraphs herein by reference.
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26 35. **Direct Infringement.** Defendant has been and continues to directly
27 infringe one or more claims of the '484 Patent in at least this District by making,
28 using, offering to sell, selling and/or importing, without limitation, at least the

1 Defendant products identified in the charts incorporated into this Court below
2 (among the “Exemplary Defendant Products”) that infringe at least the exemplary
3 claims of the ’484 Patent also identified in the charts incorporated into this Court
4 below (the “Exemplary ’484 Patent Claims”) literally or by the doctrine of
5 equivalents. On information and belief, numerous other devices that infringe the
6 claims of the ’484 Patent have been made, used, sold, imported, and offered for sale
7 by Defendant and/or its customers.
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10 36. Defendant also has and continues to directly infringe, literally or under
11 the doctrine of equivalents, the Exemplary ’484 Patent Claims, by having its
12 employees internally test and use these Exemplary Products.
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14 37. The service of this Complaint upon Defendant constitutes actual
15 knowledge of infringement as alleged here.
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17 38. Despite such actual knowledge, Defendant continues to make, use, test,
18 sell, offer for sale, market, and/or import into the United States, products that infringe
19 the ’484 Patent. On information and belief, Defendant has also continued to sell the
20 Exemplary Defendant Products and distribute product literature and website materials
21 inducing end users and others to use its products in the customary and intended
22 manner that infringes the ’484 Patent. Thus, on information and belief, Defendant is
23 contributing to and/or inducing the infringement of the ’484 Patent.
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26 39. **Induced Infringement.** Defendant actively, knowingly, and
27 intentionally has been and continues to induce infringement of the ’484 Patent,
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1 literally or by the doctrine of equivalents, by selling Exemplary Defendant Products
2 to their customers for use in end-user products in a manner that infringes one or more
3 claims of the '484 Patent.

4
5 40. Contributory Infringement. Defendant actively, knowingly, and
6 intentionally has been and continues materially contribute to their own customers'
7 infringement of the '484 Patent, literally or by the doctrine of equivalents, by selling
8 Exemplary Defendant Products to their customers for use in end-user products in a
9 manner that infringes one or more claims of the '484 Patent. Moreover, the
10 Exemplary Defendant Products are not a staple article of commerce suitable for
11 substantial noninfringing use.
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14 41. Exhibit 6 includes charts comparing the Exemplary '484 Patent Claims
15 to the Exemplary Defendant Products. As set forth in these charts, the Exemplary
16 Defendant Products practice the technology claimed by the '484 Patent.
17 Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy
18 all elements of the Exemplary '484 Patent Claims.
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21 42. Plaintiff therefore incorporates by reference in its allegations herein the
22 claim charts of Exhibit 6.

23 43. Plaintiff is entitled to recover damages adequate to compensate for
24 Defendant's infringement.
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JURY DEMAND

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2 44. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff
3 respectfully requests a trial by jury on all issues so triable.
4

PRAYER FOR RELIEF

5
6 WHEREFORE, Plaintiff respectfully requests the following relief:

7 A. A judgment that the '698 Patent is valid and enforceable;
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9 B. A judgment that Defendant has infringed, contributorily infringed,
10 and/or induced infringement of one or more claims of the '698 Patent;

11 C. A judgment that the '933 Patent is valid and enforceable;
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13 D. A judgment that Defendant has infringed, contributorily infringed,
14 and/or induced infringement of one or more claims of the '933 Patent;

15 E. A judgment that the '484 Patent is valid and enforceable;
16

17 F. A judgment that Defendant has infringed, contributorily infringed,
18 and/or induced infringement of one or more claims of the '484 Patent;

19 G. An accounting of all damages not presented at trial;
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21 H. A judgment that awards Plaintiff all appropriate damages under 35
22 U.S.C. § 284 for Defendant's past infringement, and any continuing or future
23 infringement of the Patents-in-Suit, up until the date such judgment is entered,
24 including pre- or post-judgment interest, costs, and disbursements as justified under
25 35 U.S.C. § 284 and, if necessary, to adequately compensate Plaintiff for Defendant's
26 infringement, an accounting:
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1 i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285
2 and that Plaintiff be awarded its reasonable attorneys' fees against Defendant that it
3 incurs in prosecuting this action;

4
5 ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this
6 action; and

7 iii. that Plaintiff be awarded such further relief at law or in equity as the
8 Court deems just and proper.
9

10 Dated: August 14, 2020

Respectfully submitted,

11 /s/ Michael J. Glenn

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