

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

VDPP LLC,

Plaintiff,

v.

**JURY TRIAL DEMANDED**

LENOVO (U.S.) INC.,

Defendant.

**COMPLAINT AND NOTICE OF ABSENCE OF PUBLICLY HELD AFFILIATES**

VDPP LLC (hereinafter, “VDPP”) brings this patent-infringement action against Lenovo (U.S.) Inc. (“Lenovo”).

**Parties**

1. Plaintiff VDPP is a company organized under the laws of Oregon with a principal place of business located in Corvallis, Oregon. Pursuant to LR 3.2, VDPP states that it has no publicly held affiliates.

2. Defendant Lenovo is a corporation organized under the laws of Delaware with a principal place of business in Morrisville, North Carolina.

**Jurisdiction and Venue**

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*

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

5. This Court may exercise personal jurisdiction over Lenovo. Lenovo conducts continuous and systematic business in this District. This patent-infringement case arises directly from Lenovo's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over Lenovo would be consistent with traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1400(b).

**Infringement of U.S. Patent No. 9,699,444**

7. VDPP is the exclusive owner of United States Patent No. 9,699,444 (the "444 patent").

8. The '444 patent is valid and enforceable.

9. Lenovo infringes claim 1 of the '444 patent by making, using, and selling the Lenovo ThinkPad A275 Laptop.

10. Claim 1 provides as follows: "An apparatus comprising: a storage adapted to store one or more image frames; and a processor adapted to: obtain a first image frame from a first video stream; expand the first image frame to generate a modified image frame, wherein the modified image frame is different from the first image frame; generate a bridge frame, wherein the bridge frame is a non-solid color, wherein the bridge frame is different from the first image frame and different from the modified image frame; blend the modified image frame with the bridge frame to generate a blended modified image frame; and display the blended modified image frame." The Lenovo ThinkPad A275 Laptop has 8GB DDR4 1866 MHZ memory and 256 GB PCIe SSD Storage. The Lenovo ThinkPad A275 Laptop has a AMD A12-9800B processor running at 2.70 GHz, up to 3.60 GHz, 2 MB Cache. This can access any video file such as

YouTube video over its WiFi network. The Lenovo ThinkPad A275 Laptop can expand the first image frame to generate a modified image frame. For instance, a YouTube video with resolution 640 x 480 pixels is displayed on the Lenovo ThinkPad A275 laptop (resolution 1920 x 1080 pixels) by: Accessing the YouTube.com in a WebBrowser window, (alternatively by starting WMP (Windows Media Player or another Media Player); Selecting the video the be played, (alternatively typing in the Video URL in WMP) or other Media Player; Expanding each image frame of the video.

11. Alternatively, multi-tasking Operating Systems (OS) like Microsoft Windows 10 allow each Window to be independently re-sized (modified by expanding (Claim 1) or shrinking (Claim 5)) and re-positioned.

12. The modified image frame is different from the first image frame. Since the first image frame and the modified image frame have different resolutions, they are different. The first image frame with a resolution of 640 x 480 is displayed on the Lenovo ThinkPad 275 screen (resolution 1920 x 1080) by expanding the video to a modified image frame and displaying the modified image frame. The first image frame and modified image frame have different resolutions and so are different. The Lenovo ThinkPad A275 Laptop can generate a bridge frame and the bridge frame is a non-solid color. The Lenovo ThinkPad A275 Laptop can generate a transparent system menu. The transparent system menu is the bridge frame and it is turned on in the System Menu. The bridge frame is different from the first image frame and different from the modified image frame. The bridge frame (the Microsoft Windows 10 system menu) is different from the first image frame and different from the modified image frame. The Lenovo ThinkPad A275 Laptop blends the modified image frame with the bridge frame to generate a blended

modified image frame. The Lenovo ThinkPad A275 has a Microsoft Windows Operating System. It blends (transparently) the modified image frame with the bridge frame. The Lenovo ThinkPad A275 Laptop displays the blended modified image frame.

13. Many Lenovo ThinkPad laptops use Pulse Width Modulation (PWM) to reduce the brightness of the backlight. It is a form of backlight strobing technology, made to eliminate that also eliminate blur on the display by turning on and off the backlight of the LCD display. This means many ThinkPad laptops (such as the [Lenovo ThinkPad A275](#) laptop) also have Black Frame Insertion (BFI) and infringe US Patent 9,699,444 (Claims 26 and 27).

### **Prayer for Relief**

WHEREFORE, VDPP prays for the following relief against Lenovo:

- (a) Judgment that Lenovo has directly infringed the '444 patent;
- (b) A fair and reasonable royalty;
- (c) Pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) A Post-judgment injunction; and
- (e) Such other and further relief as the Court may deem just and proper.

### **Demand for Jury Trial**

VDPP demands a trial by jury on all matters and issues so triable.

Date: December 23, 2020

/s/ Matthew M. Wawrzyn

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