IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DISPLAY TECHNOLOGIES, LLC,	§	
	§	
Plaintiff,	§	**Case No: 7:22-cv-00488**
	§	
vs.	§	**PATENT CASE**
	§	
SONY CORPORATION OF AMERICA,	§	**JURY TRIAL DEMANDED**
	§	
Defendant.	§	
	§	

COMPLAINT

Plaintiff Display Technologies, LLC ("Plaintiff" or "Display") files this Complaint against Sony Corporation of America ("Defendant" or "Sony") 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 an address of 1 East Broward Boulevard, Suite 700, Ft. Lauderdale, FL 33301.

4.   On information and belief, Defendant is a New York corporation with a principal place of business at 25 Madison Ave, 27th Fl, New York, NY 10010-8601. On information and belief, Defendant may be served through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange St, Wilmington, DE 19801.

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 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 1 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

Sony media image system, Sony Imaging Edge mobile application, associated software,

hardware and/or apps, 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 1, the Product is a media system through which a user can view

a media file (e.g. camera photos) from a camera, through a media terminal (e.g., smartphone)

from a media node (e.g., Bluetooth server) over a communication network (e.g. Bluetooth

network) through a communication link (wireless communication). Certain aspects of this

element are illustrated in the screenshots below and/or those provided in connection with other

allegations herein.

Application that allows to transfer still images/videos to a smartphone, enables remote shooting, and provides location information to images captured by a camera.

Source: https://imagingedge.sony.net/en-us/ie-mobile.html

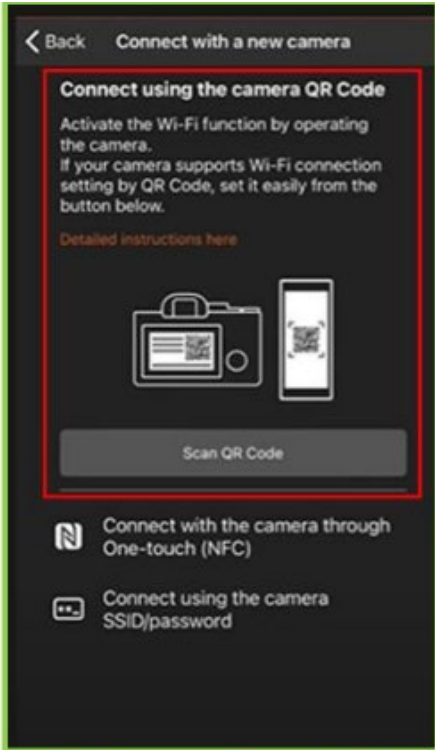1. Transfer high-quality still images/videos captured with a camera to a smartphone
Share images/videos on social media on the spot

Still images and videos captured by a camera can be transferred to a smartphone with one touch.
Still images can be batch transferred in their original size or in 2M depending on usage.
High bit rate video files including 4K can be transferred."1
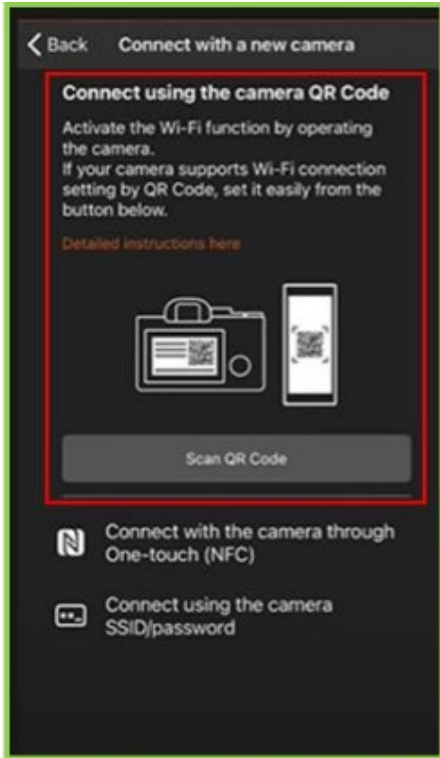
Source: https://imagingedge.sony.net/en-us/ie-mobile.html

15.   The Product includes at least one media terminal disposed in an accessible relation to at least one interactive computer network. For example, the Wi-Fi network is used for sending camera photos by detecting a smartphone (at least one media terminal) when the Imaging Edge Mobile App is installed on the smartphone and connected with Sony's camera through a Wi-Fi network (i.e. computer network). Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.

Source: https://www.youtube.com/watch?v=2ZgIOMJGFCs
Source: https://imagingedge.sony.net/en-us/ie-mobile.html

16.   A wireless range is structured to permit authorized access to the at least one interactive computer network. For example, the smartphone is connected with the camera through a QR code when the Camera Wi-Fi signals are within a certain range (wireless range) that permits the connection of the smartphone by the wireless network (interactive computer network).

Source: https://www.youtube.com/watch?v=2ZgIOMJGFCs
Source: https://imagingedge.sony.net/en-us/ie-mobile.html
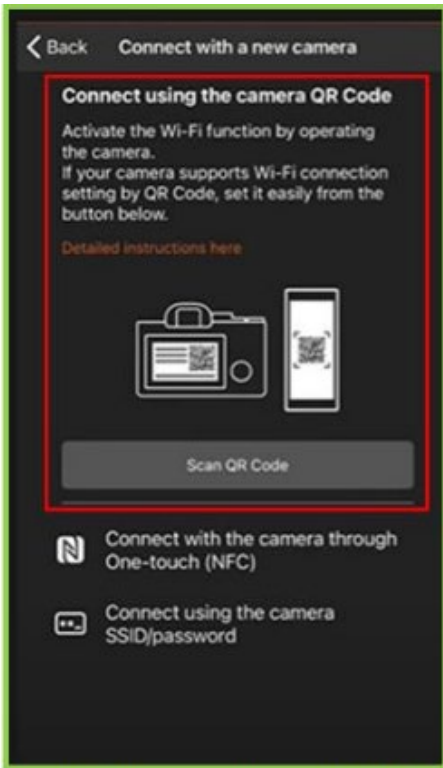
Source: https://www.youtube.com/watch?v=2ZgIOMJGFCs

17.   At least one media node is disposable within the wireless range, wherein the at least one media node is detectable by the at least one media terminal. For example, the media node (connecting camera and smartphone through Wi-Fi network) sends Wi-Fi signals, which are detected by the smartphone (at least one media terminal) when the smartphone is in the camera's Wi-Fi range. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.
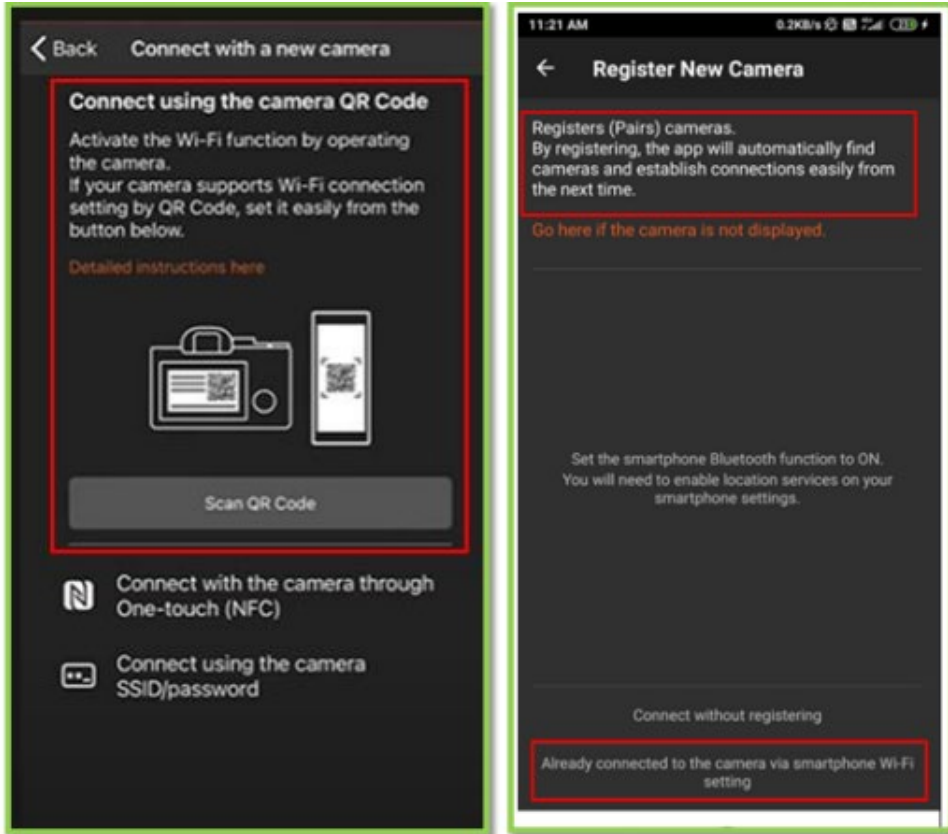
Source: https://www.youtube.com/watch?v=2ZgIOMJGFCs
Source: Actual usage of the product.

18.   At least one digital media file is initially disposed on at least one of the at least

one media terminal or the at least one media node and the at least one media terminal is structured

to detect the at least one media node disposed within the wireless range. For example, the

smartphone (media terminal) is connected with the camera through a QR code when the

smartphone comes within range (wireless) of the Wi-Fi signals. When the smartphone is

connected with the camera, the user can view photos and digital files of a camera on the

Smartphone (digital media file).

Source: https://www.youtube.com/watch?v=2ZglOMJGFCs
Source: https://imagingedge.sony.net/en-us/ie-mobile.html

Source: https://www.youtube.com/watch?v=2ZglOMJGFCs
Source: https://play.google.com/store/apps/details?id=com.sony.playmemories.mobile
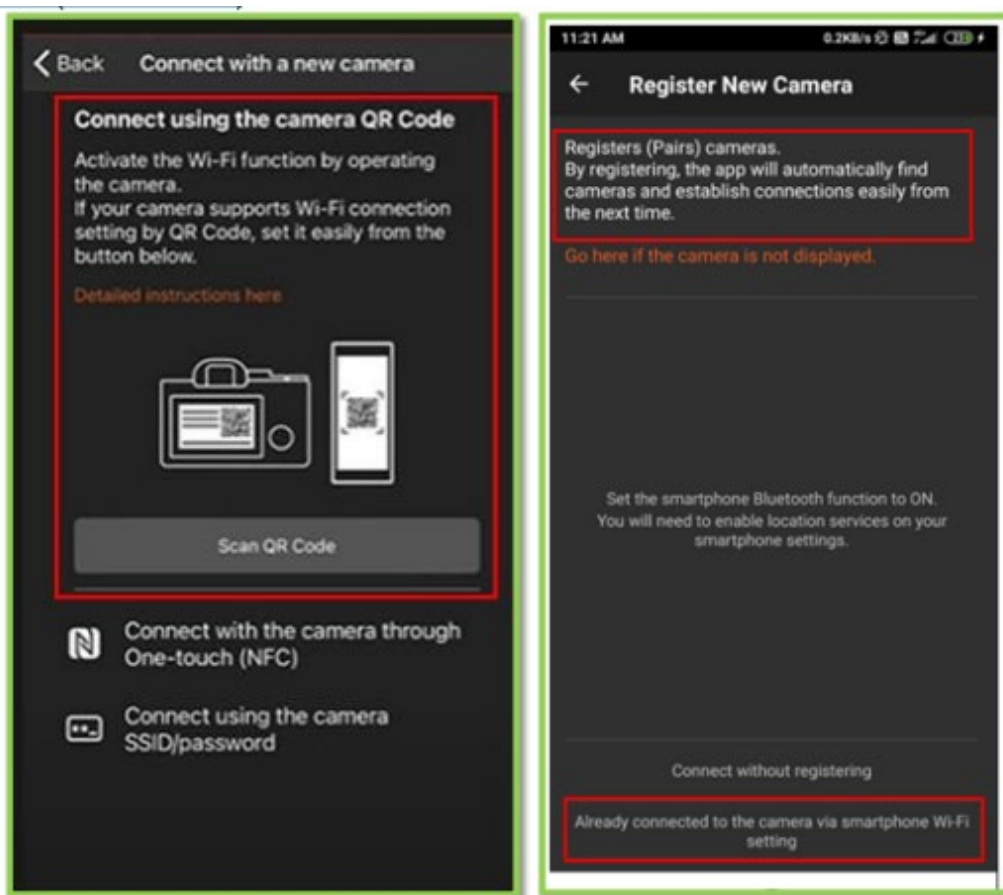
19.   A communication link is structured to dispose the at least one media terminal and the at least one media node in a communicative relation with one another via the at least one interactive computer network.   For example, the smartphone (media terminal) connects by scanning a QR code of the camera (i.e. media node) through a Wi-FI network (interactive computer network).

20.   The communication link is initiated by the at least one media terminal. For example, the communication link, i.e. Wi-Fi network, which is the link between smartphone and the camera (media terminal) is initiated by either the camera or the smartphone.

Source: https://www.youtube.com/watch?v=2ZglOMJGFCs
Source: Actual usage of the product.

21.   The at least one media node and the at least one media terminal are structured to transmit the at least one digital media file therebetween via the communication link.   For

example, the smartphone is connected with the camera through a Wi-Fi network (media node) when the smartphone (media terminal) is within the Wi-Fi range. The user can then view photos and digital files of a camera on the smartphone (digital media file).

Source: https://imagingedge.sony.net/en-us/ie-mobile.html

Source: https://imagingedge.sony.net/en-us/ie-mobile.html

22.   The communication link is structured to bypass at least one media terminal security measure for a limited permissible use of the communication link by the media node to only transferring the at least one digital media file to, and displaying the at least one digital media file on, the at least one media terminal. For example, the communication link is structured so that whenever the user installs the application on the smartphone (media terminal), the smartphone is connected with the camera through a QR code (i.e. media terminal security) when the smartphone is within range (wireless) of the Wi-Fi signals. When the smartphone is

connected with the camera, the user can view photos and digital files of a camera on the

Smartphone (digital media file).
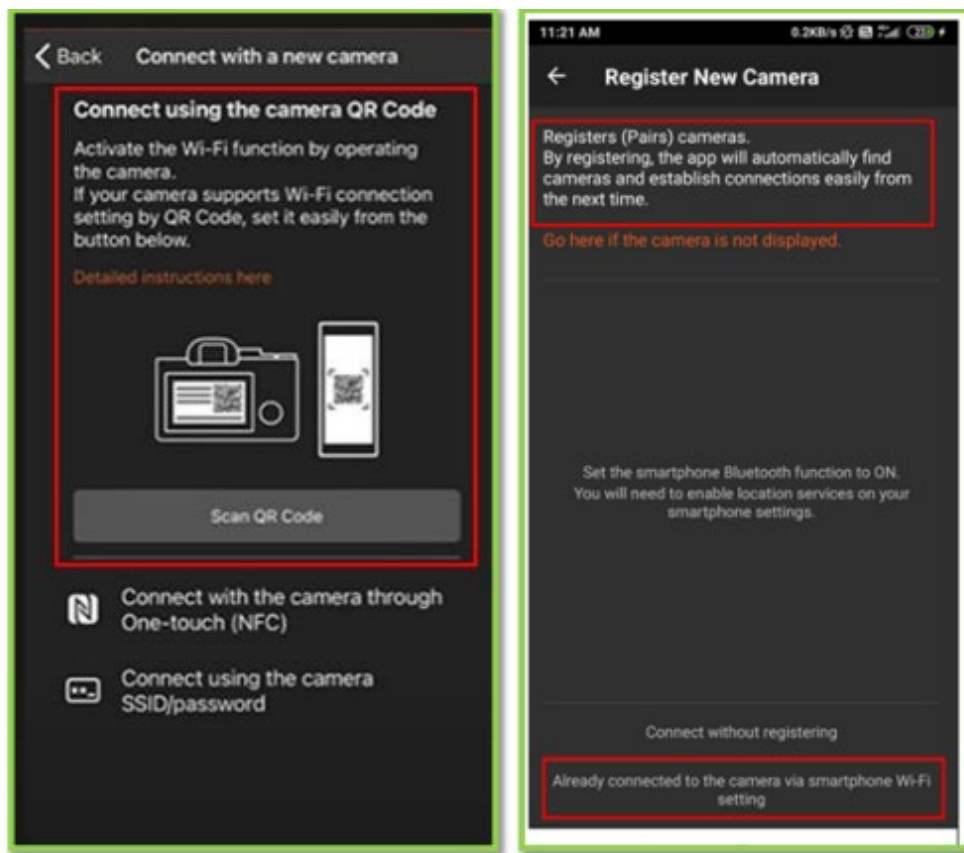
Source: https://www.youtube.com/watch?v=2ZglOMJGFCs
Source: Actual usage of the product.

Source: https://www.youtube.com/watch?v=2ZglOMJGFCs
Source: https://play.google.com/store/apps/details?id=com.sony.playmemories.mobile

1. Transfer high-quality still images/videos captured with a camera to a smartphone
Share images/videos on social media on the spot

Still images and videos captured by a camera can be transferred to a smartphone with one touch.
Still images can be batch transferred in their original size or in 2M depending on usage.
High bit rate video files including 4K can be transferred.*1

Source: https://imagingedge.sony.net/en-us/ie-mobile.html

Application that allows to transfer still images/videos to a smartphone, enables remote shooting, and provides location information to images captured by a camera.

Source: https://imagingedge.sony.net/en-us/ie-mobile.html

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

24.   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.

25.   Plaintiff is in compliance with 35 U.S.C. § 287.

JURY DEMAND

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

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.

Dated: January 19, 2022.   Respectfully submitted,

/s/ Jay Johnson
JAY JOHNSON (*pro hac vice forthcoming*)
State Bar No. 24067322
D. BRADLEY KIZZIA
State Bar No. 11547550
KIZZIA JOHNSON, PLLC
1910 Pacific Ave., Suite 13000
Dallas, Texas 75201
(214) 451-0164
Fax: (214) 451-0165
jay@kjpllc.com
bkizzia@kjpllc.com

ATTORNEYS FOR PLAINTIFF