

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

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VDPP LLC,

Plaintiff,

v.

**JURY TRIAL DEMANDED**

MOTOROLA MOBILITY LLC,

Defendant.

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**COMPLAINT**

VDPP LLC (hereinafter, “VDPP”) brings this patent-infringement action against Motorola Mobility LLC (hereinafter, “Motorola”).

**Parties**

1. Plaintiff VDPP is an Oregon company with its principal place of business in Corvallis, Oregon.
2. Motorola is a Delaware company, having a regular and established place of business in Chicago, Illinois.

**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 Motorola. Motorola conducts

continuous and systematic business in Illinois and in this District. Motorola maintains corporate offices in this District. This patent-infringement case arises directly from Motorola's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over Motorola 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. §§ 1391(b)(2) and 1400(b).

**Count 1: Infringement of U.S. Patent No. 11,039,123**

7. VDPP is the exclusive owner of United States Patent No. 11,039,123 (the "'123 Patent"), which is attached hereto as "Exhibit 1."

8. The '123 Patent is valid and enforceable.

9. Motorola has been and is directly infringing the claims of the '123 patent. For example, Motorola makes, uses, and sells the BLISS54-2, which infringes Claim 1 of the '123 Patent. The BLISS54-2 includes (1) multiple video inputs that are stitched and displayed; (2) a red-green-blue subpixel arrangement for each pixel, and; (3) a transparent (non-solid color) on-screen display (OSD) or bridge frame that is blended with the picture and displayed. Motorola makes other products that infringe the '123 Patent. The infringing products include: laptops; tablets; all-in-one computers; notebooks, and smartphones (all models referenced in this paragraph 9 are the "Accused Models").

10. Claim 1 of the '123 Patent provides as follows: "An apparatus adapted to: obtain a first image from a first video stream; obtain a second image from a second video stream, wherein the first image is different from the second image; stitch together the first image and the second image to generate a stitched image frame; generate a first modified image frame by removing a first portion of the stitched image frame; generate a second modified image frame by removing a

second portion of the stitched image frame; generate a third modified image frame by removing a third portion of the stitched image frame; wherein the first modified image frame, the second modified image frame, and the third modified image frame are different from each other; identify a bridge frame that is a non-solid color; blend the first modified image frame with the bridge frame to generate a first blended frame; blend the second modified image frame with the bridge frame to generate a second blended frame; blend the third modified image frame with the bridge frame to generate a third blended frame; display the first blended frame, the second blended frame, and the third blended frame.” (Ex. 1 at 112:53-113:5.)

11. The BLISS54-2 includes Picture-by-Picture (“PbP”). This means that the BLISS54-2 can obtain a first image from a first video stream from an input port to the monitor.

12. The BLISS54-2’s PbP allows the monitor to also obtain a second image from a second video stream from an input port to the monitor. Since the two video streams can be different, the first image is different from the second image. The BLISS54-2 can stitch together the first image and the second image. This generates a stitched image.

13. The BLISS54-2 removes the Green and Blue color from the stitched image frame (leaving just Red) to generate a first modified image frame.

14. The BLISS54-2 removes the Red and Blue color from the stitched image frame (leaving just the Green) to generate a second modified image frame.

15. The BLISS54-2 removes the Red and Green color from the stitched image frame (leaving just the Blue) to generate a third modified image frame. The first modified image frame, the second modified image frame, and the third modified image frame are different from each other.

16. The BLISS54-2 has a transparent menu that is a non-solid color.
17. The BLISS54-2 blends the first modified image frame with the bridge frame to generate a first blended frame.
18. The BLISS54-2 blends the second modified image frame with the bridge frame to generate a second blended frame.
19. The BLISS54-2 blends the third modified image frame with the bridge frame to generate a third blended frame.
20. The BLISS54-2 displays the first blended frame, the second blended frame, and the third blended frame. The transparent menu blended with each of the underlying subpixel blended frames is displayed.

**Count 2: Infringement of U.S. Patent No. 9,426,452**

21. The preceding paragraphs are incorporated herein by reference.
22. VDPP is the exclusive owner of U.S. Patent No. 9,426,452 (the “’452 Patent”), which is attached hereto as “Exhibit 2.”
23. The ’452 Patent is valid and enforceable.
24. The Accused Models infringe Claim 4 of the ’452 Patent.
25. Claim 2 provides, “An apparatus comprising: a storage adapted to: store one or more image frames; and a processor adapted to: obtain a first image from a first video stream; obtain a second image from a second video stream, wherein the first image is different from the second image; stitch together the first image and the second image to generate a stitched image frame; generate a first modified image frame by removing a first portion of the stitched image frame; generate a second modified image frame by removing a second portion of the stitched image

frame; generate a third modified image frame by removing a third portion of the stitched image frame; wherein the first modified image frame, the second modified image frame, and the third modified image frame are different from each other; identify a bridge frame; blend the first modified image frame with the bridge frame to generate a first blended frame; blend the second modified image frame with the bridge frame to generate a second blended frame; blend the third modified image frame with the bridge frame to generate a third blended frame; overlay the first blended frame, the second blended frame, and the third blended frame to generate a combined frame; display the combined frame.”

26. Claim 4 provides, “The apparatus of claim 2, wherein the bridge frame comprises a non-solid color.”

27. The BLISS54-2 includes PbP. This means BLISS54-2 can obtain a first image from a first video stream from an input port to the monitor.

28. The BLISS54-2’s PbP allows the monitor to also obtain a second image from a second video stream from an input port to the monitor. Since the two video streams can be different, the first image is different from the second image. The BLISS54-2 can stitch together the first image and the second image. This generates a stitched image.

29. The BLISS54-2 removes the Green and Blue color from the stitched image frame (leaving just Red) to generate a first modified image frame.

30. The BLISS54-2 removes the Red and Blue color from the stitched image frame (leaving just the Green) to generate a second modified image frame.

31. The BLISS54-2 removes the Red and Green color from the stitched image frame (leaving just the Blue) to generate a third modified image frame. The first modified image frame,

the second modified image frame, and the third modified image frame are different from each other.

32. The BLISS54-2 has a transparent menu that is a non-solid color.

33. The BLISS54-2 blends the first modified image frame with the bridge frame to generate a first blended frame.

34. The BLISS54-2 blends the second modified image frame with the bridge frame to generate a second blended frame.

35. The BLISS54-2 blends the third modified image frame with the bridge frame to generate a third blended frame.

36. The BLISS54-2 displays the first blended frame, the second blended frame, and the third blended frame. The transparent menu blended with each of the underlying subpixel blended frames is displayed.

#### **Prayer for Relief**

WHEREFORE, VDPP prays for the following relief against Motorola: (a) Judgment that Motorola has directly infringed the '123 Patent and the '452 Patent; (b) a reasonable royalty; (c) pre-judgment interest and post-judgment interest at the maximum rate allowed by law; and (d) 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 triable by jury.

Date: June 23, 2022

Respectfully Submitted,

/s/ Matthew M. Wawrzyn

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