

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

NOV 19 2004

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

IP INNOVATION L.L.C., TECHNOLOGY  
LICENSING CORPORATION, NEW  
MEDIUM TECHNOLOGIES LLC, and AV  
TECHNOLOGIES LLC,

Plaintiffs,

v.

SONY ELECTRONICS, INC.,

Defendant.

No. 04 C 6388

Judge Matthew F. Kennelly

JURY TRIAL DEMAND

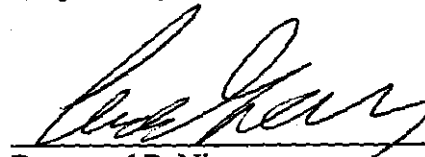
**DOCKETED**

NOV 22 2004

**NOTICE OF FILING**

Plaintiffs IP Innovation, Technology Licensing Corporation, New Medium Technologies, and AV Technologies, pursuant to Fed. R. Civ. P. 15(a), hereby file their Amended Complaint as of right as the defendant has not yet been formally served, nor has it filed a responsive pleading to the originally filed Complaint.

Respectfully Submitted,



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TECHNOLOGIES LLC

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**AMENDED COMPLAINT**

Plaintiffs, IP Innovation L.L.C. ("IP Innovation"), Technology Licensing Corporation ("TLC"), New Medium Technologies LLC ("New Medium"), and AV Technologies LLC ("AV Technologies") complain of defendant, Sony Electronics, Inc. ("Sony"), as follows:

**PARTIES, JURISDICTION AND VENUE**

1. This is a claim for patent infringement arising under the patent laws of the United States, including 35 U.S.C. § 271. This Court has exclusive jurisdiction over the subject matter of this action under 28 U.S.C. § 1338(a).

2. IP Innovation, L.L.C. ("IP Innovation") is a Texas limited liability company, with its principal place of business at 500 Skokie Boulevard, Suite 585, Northbrook, Illinois 60062.

3. TLC is a Nevada corporation and has its principal place of business at 1000 E. William Street, Suite 204, Carson City, NV 89701.

4. New Medium is an Illinois limited liability company, with its principal place of business at 500 Skokie Boulevard, Suite 585, Northbrook, Illinois 60062.

5. AV Technologies is an Illinois limited liability company, with its principal place of business at 500 Skokie Boulevard, Suite 585, Northbrook, Illinois 60062.

6. IP Innovation and TLC together own the full and exclusive right, title and interest in and have standing to sue for infringement of United States Patent No. 5,424,780 C1, entitled "Apparatus and Method for Spatial Scan Modulation of a Video Display," which issued June 13, 1995 and, after a reexamination by the Patent and Trademark Office, was confirmed and found valid and patentable a second time on July 23, 2002 ("the '780 Patent", Exhibit A).

7. IP Innovation and TLC together own the full and exclusive right, title and interest in and have standing to sue for infringement of United States Patent No. 6,529,637 B1, entitled "Spatial Scan Replication Circuit," which issued March 4, 2003 ("the '637 Patent", Exhibit B).

8. New Medium is TLC's exclusive licensee and owns all rights and interest in, and has standing to sue for infringement of United States Patent No. 6,469,741 B2, entitled "Apparatus and Method for Processing Television Signals," which issued October 22, 2002 ("the '741 Patent," Exhibit C).

9. AV Technologies is TLC's exclusive licensee and owns all rights and interest in, and has standing to sue for infringement of United States Patent No. 4,723,166, entitled "Noise Adjusted Recursive Filter," which issued February 2, 1988 ("the '166 Patent," Exhibit D).

10. Sony Electronics, Inc. is a Delaware corporation having a principal place of business at One Sony Drive, Park Ridge, New Jersey 07656. Sony sells consumer and professional electronics products nationwide and in this judicial district.

11. Sony has sold or offered to sell products that infringe the '780, '637, '741 and '166 patents within this judicial district, and has advertised the sale of such products in this judicial district.

12. Sony is subject to personal jurisdiction in this judicial district.

13. Venue is proper in this district under 28 U.S.C. § 1400(b).

### **PATENT INFRINGEMENT**

14. Sony has infringed the '780, '637, '741 and '166 patents at least by making, using, importing, selling or offering to sell, and by inducing, aiding and abetting, encouraging or contributing to others' use of, among other products, televisions, flat panel TVs, set-top boxes and other consumer and professional broadcast products that fall within the scope of one or more claims of the '780, '637, '741 and '166 patents.

15. Sony's infringement has injured plaintiffs, and plaintiffs are entitled to recover damages adequate to compensate them for the infringement that has occurred, but in no event less than a reasonable royalty.

16. The infringement by Sony has injured and will continue to injure plaintiffs, unless and until such infringement is enjoined by this Court.

WHEREFORE, plaintiffs, IP Innovation L.L.C., Technology Licensing Corporation, New Medium Technologies LLC, and AV Technologies LLC, respectfully request judgment against Sony and its subsidiaries and affiliates as follows:

- A. An award of damages adequate to compensate plaintiffs for the infringement that has occurred, together with prejudgment interest from the date infringement of the '780, '637, '741 and '166 patents began;

- B. Any other damages permitted, including any for willful infringement, under 35 U.S.C. § 284;
- C. A finding that this case is exceptional and an award to plaintiffs of their attorneys' fees and expenses as provided by 35 U.S.C. § 285;
- D. An injunction permanently prohibiting Sony and all persons in active concert or participation with it, from further acts of infringement of the '780 and '637 patents; and
- E. Such other and further relief as this Court or a jury may deem proper.

**JURY DEMAND**

Plaintiffs demand a trial by jury.

Respectfully Submitted,



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TECHNOLOGIES LLC

*See Case File  
for  
Exhibits*

