

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

RECOGNICORP, LLC,

Plaintiff,

v.

CCP HF; CCP NORTH AMERICA,  
INC.;

Defendants.

Civil Action No. \_\_\_\_\_

JURY TRIAL DEMANDED

**ORIGINAL COMPLAINT**

Plaintiff Recognicorp, LLC (“Recognicorp” or “Plaintiff”), for its Complaint against defendants CCP hf and CCP North America, Inc. (each “Defendant” or collectively “Defendants”) alleges the following:

**NATURE OF THE ACTION**

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §§ 1, *et seq.*

**THE PARTIES**

2. Plaintiff Recognicorp is a limited liability company organized under the laws of the State of Texas with its principal place of business at 106 Fannin Avenue East, Round Rock, Texas 78664-5219.

3. On information and belief, Defendant CCP hf is a company organized under the laws of Iceland with its principal place of business at Grandagarður 8, 101 Reykjavik, Iceland.

4. On information and belief, Defendant CCP North America, Inc. is a company organized under the laws of the State of Delaware, with its principal place of business at 2075 West Park Place Boulevard, Suite G, Stone Mountain, Georgia 30087. CCP North America may be served through its registered agent, Yasoni Bennett, at 2075 West Park Place Boulevard, Suite G, Stone Mountain, Georgia 30087.

### **JURISDICTION AND VENUE**

5. This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 of the United States Code.

6. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.

7. CCP hf is subject to the jurisdiction of this Court by reason of its acts of patent infringement which have been committed in this Judicial District, and by virtue of its regularly conducted and systematic business contacts in this State. As such, CCP hf has purposefully availed itself of the privilege of conducting business within this Judicial District, has established sufficient minimum contacts with this

Judicial District such that it should reasonably and fairly anticipate being haled into court in the District, has purposefully directed activities at residents of this State, and at least a portion of the patent infringement claims alleged herein arise out of or are related to one or more of the foregoing activities.

8. CCP North America, Inc. is subject to the jurisdiction of this Court by reason of its acts of patent infringement which have been committed in this Judicial District, and by virtue of its regularly conducted and systematic business contacts in this State. As such, CCP North America has purposefully availed itself of the privilege of conducting business within this Judicial District, has established sufficient minimum contacts with this Judicial District such that it should reasonably and fairly anticipate being haled into court in the District, has purposefully directed activities at residents of this State, and at least a portion of the patent infringement claims alleged herein arise out of or are related to one or more of the foregoing activities. CCP North America is also subject to the jurisdiction of this Court because, upon information and belief and for purposes of personal jurisdiction, it is a resident of Georgia.

9. For the reasons identified above, venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and (c) and 1400(b).

**COUNT I – INFRINGEMENT OF U.S. PATENT NO. 8,005,303**

10. The allegations set forth in the foregoing paragraphs 1 through 9 are incorporated into this First Claim for Relief as if fully set forth herein.

11. On August 23, 2011, United States Patent No. 8,005,303 (the “‘303 patent”), entitled “Method and Apparatus for Encoding/Decoding Image Data,” was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the ‘303 patent is attached as **Exhibit A** to this Complaint.

12. Recognicorp is the assignee and owner of the right, title and interest in and to the ‘303 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

13. Upon information and belief, in violation of 35 U.S.C. § 271(a), each Defendant has directly infringed, and continues to directly infringe, including under the doctrine of equivalents, the ‘303 patent by making, using, importing, selling, and/or offering for sale in the United States, including within this judicial district, products incorporating composite image customization that infringe one or more claims of the ‘303 Patent (“Accused Services and Products”), without the authority of Recognicorp.

14. The Accused Services and Products include, but are not limited to, Eve Online. Features of Eve Online that infringe one or more claims of the ‘303

Patent include character creation and customization that allow the selection of a facial feature, incorporation of the facial feature into a composite image, and instructions for modifying the selected facial feature image that has been incorporated into the composite image.

15. Recognicorp has been harmed by Defendant's infringing activities.

**JURY DEMAND**

16. Recognicorp demands a trial by jury on all issues triable as such.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Recognicorp demands judgment for itself and against each Defendant as follows:

- A. An adjudication that each Defendant has infringed the '303 patent;
- B. An award of damages to be paid by each Defendant and/or Defendants collectively, adequate to compensate Recognicorp for its past infringement of the '303 patent, and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C. An injunction ordering each Defendant and/or Defendants collectively, to pay an ongoing royalty in an amount to be determined for any continued infringement after the date judgment is entered;

D. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Plaintiff's reasonable attorneys' fees; and

E. An award to Recognicorp of such further relief at law or in equity as the Court deems just and proper.

This 11th day of July, 2012.

Respectfully submitted,

/s/ Steven G. Hill

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