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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 1ST TECHNOLOGY LLC, a Nevada Limited
17 Liability Company,

18 Plaintiff,

19 v.

20 GIGA MEDIA LTD., GRAND VIRTUAL, INC.,
21 CAMBRIDGE INTERACTIVE
22 DEVELOPMENT CORP., ULTRANET
23 INTERNET MEDIA, S.A., LASSETERS
24 CORP., LTD., PARLAY ENTERTAINMENT,
25 INC., and LEISURE & GAMING PLC.

26 Defendants.

CASE NO.

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY DEMAND

27 **COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff 1st Technology LLC ("1st Technology"), alleges the following against, Giga Media Ltd., Grand Virtual, Inc., Cambridge Interactive Development Corporation, Ultramet Internet Media, S.A., Lasseters Corporation Ltd., Parlay Entertainment, Inc., and Leisure & Gaming PLC (collectively, "Defendants"):

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INTRODUCTION

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2 1. Dr. Scott Lewis ("Dr. Lewis") is the Controlling Manager of 1st Technology.

3 2. Dr. Lewis received B.S. and M.S. degrees in mechanical and electrical
4 engineering from M.I.T. with honors. Dr. Lewis has a Ph.D. from Oxford University in
5 adaptive digital processing as a Marshall Scholar and an M.B.A. from Harvard Business
6 School. Dr. Lewis led the development of single-chip video and audio compression solutions,
7 as well as the first automotive video cellular telephone.
8

9 3. Dr. Lewis invested substantial resources to invent a number of multimedia
10 communication technologies, including the separation, processing and recombination of
11 multiple streams of multimedia data. This processing can include enhancement, compression
12 and other forms of data manipulation. Dr. Lewis was issued number of patents for his
13 inventions. The inventions of Dr. Lewis's patents are used in many online wagering systems.
14

15 4. United States Patent No. 5,564,001, entitled "Method and System for
16 Interactively Transmitting Multimedia Information Over a Network Which Requires Reduced
17 Bandwidth," was issued to Dr. Lewis on October 8, 1996.

18 5. 1st Technology LLC ("1st Technology") is the assignee of and owns all rights,
19 title and interest in the '001 Patent and has standing to sue for infringement of the '001 Patent.
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PARTIES

21 6. 1st Technology is a Nevada Limited Liability Company with offices at 10080
22 Alta Drive, Las Vegas, Nevada, 89145.
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24 7. Upon information and belief, Giga Media Limited ("Giga Media") is a foreign
25 company with headquarters in Taipei, Taiwan engaged in the business of providing software
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1 products useful in connection with operating various internet gambling websites, including
2 gambling websites accessible to users in the United States.

3 8. Upon information and belief, Cambridge Interactive Development Corporation
4 (“Cambridge Interactive”), formerly doing business as Grand Virtual, Inc. (“Grand Virtual”)
5 is a corporation organized under the laws of the State of Delaware and has a principal office
6 located at 100 Cambridge Park Drive, Cambridge, MA 02140. Upon information and belief,
7 Cambridge Interactive is a wholly-owned subsidiary corporation of Giga Media and is
8 engaged in the business of providing software products useful in connection with operating
9 various internet gambling websites, including gambling websites accessible to users in the
10 United States.
11

12 9. Upon information and belief, Ultrabet Internet Media, S.A. (“Ultrabet Media”)
13 is a foreign corporation, with headquarters in Charlestown, Nevis and a principal place of
14 business in Kahnawake, Quebec. Upon information and belief, Ultrabet Media is engaged in
15 the business of operating internet gambling websites, accessible to users in the United States,
16 and operates its internet gambling websites using, at least in part, software supplied by Giga
17 Media, Cambridge Interactive, and Grand Virtual.
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19 10. Giga Media and Grand Virtual, along with Cambridge Interactive and Ultrabet
20 Media, have infringed and, until at least October 2006 or later, continued to infringe by
21 making, using, selling, offering for sale and/or importing into the United States software
22 products that infringe one or more claims of the ‘001 Patent. Giga Media, Cambridge
23 Interactive, Grand Virtual, and Ultrabet Media, have infringed the ‘001 Patent either directly
24 or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.
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1 11. Upon information and belief, Lasseters Corporation Limited ("Lasseters
2 Corp.") is a foreign company with offices at 388 Brunswick Street, Fortitude Valley, QLD,
3 Australia, 4006. Lasseters Corp. has infringed and, until at least October 2006 or later,
4 continued to infringe, by making, using, selling, offering for sale and/or importing into the
5 United States software products that infringe one or more claims of the '001 Patent. Lasseters
6 Corp. has infringed the '001 Patent either directly or through acts of contributory
7 infringement or inducement in violation of 35 U.S.C. § 271.

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9 12. Upon information and belief, Parlay Entertainment, Inc. ("Parlay
10 Entertainment") is a foreign company with offices at 2305 Wyecroft Road, 2nd floor, Oakville,
11 Ontario, Canada, L6L 6R2. Parlay Entertainment has and continues to infringe by making,
12 using, selling, offering for sale and/or importing into the United States software products that
13 infringe one or more claims of the '001 Patent. Parlay Entertainment has infringed the '001
14 Patent either directly or through acts of contributory infringement or inducement in violation
15 of 35 U.S.C. § 271.

16
17 13. Upon information and belief, Leisure & Gaming PLC ("Leisure and Gaming")
18 is a foreign company with offices at Ashville House, 131-139 The Broadway, Wimbledon,
19 London, SW19 1QJ, United Kingdom. Leisure and Gaming has infringed and, until at least
20 October 2006 or later, continued to infringe by making, using, selling, offering for sale and/or
21 importing into the United States software products that infringe one or more claims of the
22 '001 Patent. Giga Medial has infringed the '001 Patent either directly or through acts of
23 contributory infringement or inducement in violation of 35 U.S.C. § 271.

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JURISDICTION AND VENUE

14. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338. This Court also has diversity jurisdiction under 28 U.S.C. § 1332(a), as there is complete diversity of citizenship and the matter in controversy exceeds the sum of \$75,000. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b), (d) and 1400(b).

DEFENDANTS' ACTS OF PATENT INFRINGEMENT

15. Each of the Defendants has infringed the '001 Patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

16. Giga Media, Grand Virtual, Cambridge Interactive and Ultranet Media have infringed and continued to infringe at least Claim 26 of the '001 Patent until at least October 2006 or later.

17. Lasseters Corp. has infringed and continued to infringe at least Claim 26 of the '001 Patent until at least October 2006.

18. Parlay Entertainment has infringed and continues to infringe at least Claim 26 of the '001 Patent.

19. Leisure and Gaming has infringed and continued to infringe at least Claim 26 of the '001 Patent until at least October 2006 or later.

PRAYER FOR RELIEF

WHEREFORE, 1ST Technology LLC asks this Court to enter judgment against defendants and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

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1 A. An award of damages adequate to compensate 1ST Technology LLC for the
2 infringement that has occurred, together with prejudgment interest from the date infringement
3 of the '001 patent began;

4 B. Increased damages as permitted under 35 U.S.C. § 284;

5 C. A finding that this case is exceptional and an award to 1ST Technology LLC of
6 its attorneys' fees and costs as provided by 35 U.S.C. § 284;

7 D. A permanent injunction prohibiting further infringement, inducement and
8 contributory infringement of the '001 patent; and,

9 E. Such other and further relief as this Court or a jury may deem proper and just.

10 **JURY DEMAND**

11 1st Technology hereby demands a trial by jury of all issues.

12 DATED this 11th day of October, 2007.

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