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Attorneys for Plaintiff
Secure Cam, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Secure Cam, LLC, a Wyoming Limited Liability Company
 	
        Plaintiff,
 	
v.
 	
Project Nursery, LLC, a California Limited Liability Company,
 	
        Defendant.
	Case No. _____
	
	COMPLAINT FOR INFRINGEMENT OF U.S. PATENT NO. 7,257,158
	
	DEMAND FOR JURY TRIAL

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COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Secure Cam, LLC, ("Secure Cam" or "Plaintiff"), by and through its undersigned counsel, for its Complaint against Defendant Project Nursery, LLC ("Project Nursery" or "Defendant") makes the following allegations.   These allegations are made upon information and belief.

NATURE OF THE ACTION

1.   This is an action against Defendant for infringement of one or more claims of United States Patent No. 7,257,158 ("the '158 Patent").

PARTIES

2.   Plaintiff Secure Cam is a limited liability company organized under the laws of the State of Wyoming and has an office and principal place of business at 30 N Gould St. STE R, Sheridan, WY 82801.

3.   Defendant Project Nursery, LLC is a limited liability company organized under the laws of the State of California and has an office and principal place of business at 2702 California St., San Francisco, CA 94115.

JURISDICTION AND VENUE

4.   This action arises under the patent laws of the United States, including 35 U.S.C. §§ 271 et seq., 281, and 284.

5.   This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because it arises under United States Patent law.

6.   This Court has personal jurisdiction over the Defendant because, *inter alia*, it resides in the State of California; regularly conducts business in the State of California; and continues to commit acts of patent infringement in the State of

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California including by making, using, offering to sell, and/or selling Accused Products within the State of California and this district.

7.   Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b). Defendant is subject to this Court's personal jurisdiction because, *inter alia*, Defendant has committed and continues to commit acts of patent infringement including making, using, offering to sell, and/or selling Accused Products in this district, and/or importing Accused Products into this district; Defendant has a principal place of business in this judicial district, and Defendant employs personnel in this judicial district.

FACTS

8.   Plaintiff is the owner, by assignment, of U.S. Patent No. 7,257,158 ("the '158 Patent"), entitled "System for Transmitting Video Images over a Computer Network to a Remote Receiver," which was duly and legally issued on August 14th, 2007 by the United States Patent and Trademark Office ("USPTO").

9.   A copy of the '158 Patent is attached to this Complaint as **Exhibit A**.

10.   The claims of the '158 Patent are valid and enforceable.

COUNT I: CLAIM FOR PATENT INFRINGEMENT
UNDER 35 U.S.C. § 271(a) ('158 PATENT)

11.   Plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 10 of this Complaint as if fully set forth herein.

12.   Claim 12 of the '158 Patent covers "a system for transmitting a real-time video and remote control commands over a digital network, said system comprising a transmitter containing one or more digitized frames of said real-time video being

COMPLAINT FOR PATENT INFRINGEMENT

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transmitted, the digital network connected to said transmitter, and one or more remote receivers connected to said network for receiving said video from said transmitter, wherein at least one of said receivers is configured to receive one or more control commands from a user, wherein said transmitter is configured to receive and interpret at least one of said control commands from said one of said receivers over said network, and wherein, upon interpretation of said control command, said transmitter dynamically changes the operation of said transmitter while said video is being transmitted, whereby said user can remotely control the operation of said transmitter in substantially real-time."

13.   Defendant manufactures, imports into the United States, offers for sale, and/or sells face recognition readers and license plate recognition cameras, which infringe at least Claim 12 of the '158 Patent (hereafter "Accused Product(s)").

14.   Defendant's Accused Product(s) include, without limitation Project Nursery 5" HD Dual Connect Wi-Fi Baby Monitor System, Project Nursery 4.3 Baby Monitor System with 2 Digital Zoom Cameras, Project Nursery Video Baby Monitor System with Digital Zoom Camera, Project Nursery 5" High Definition Baby Monitor System with 1.5" Mini Monitor, Project Nursery 4.3" Baby Monitor System with 1.5" Mini Monitor, and Project Nursery 4.3" Baby Monitor System.

15.   A claim chart comparing Claim 12 of the '158 Patent to the Accused Product(s) is attached as Exhibit B.

16.   The Accused Product(s) includes a camera that captures real-time video data. See Exhibit B, p. 1-2.

17.   The Accused Product(s) includes a 2.4 GHz wireless digital network that communicates the camera and the parent unit. See Exhibit B, p. 3.

18.   The Accused Product(s) includes a parent unit that receives video data from the camera over the wireless network. See Exhibit B, p. 4.

COMPLAINT FOR PATENT INFRINGEMENT

19.   The Accused Product(s) includes buttons that allow the user of the parent unit to selectively and remotely stop transmission (power button) and pan, tilt, and zoom the camera. See Exhibit B, p. 5.

20.   The Accused Products(s) includes a camera that receives and interprets the command signal from the parent unit. See Exhibit B, p. 6.

21.   The Accused Product(s) includes a camera whose operation is changed by stopping transmission by turning off the power and by utilizing the pan, tilt, zoom functions. See Exhibit B, p. 7.

22.   The Accused Product(s) includes a camera where the user can remotely start and stop transmission, pan, tilt, and zoom in real time. See Exhibit B, p. 8.

23.   Each one of the elements included in the Infringing System, itemized in paragraphs 16 – 22 above, is an element in Claim 12 of the '158 Patent.

24.   Plaintiff has been, and will continue to be, irreparably harmed by Defendant's ongoing infringement of the '158 Patent.

25.   As a direct and proximate result of Defendant's infringement of the '158 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be determined.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief against Defendant as follows:

A.   In favor of Plaintiff that Defendant has infringed one or more claims of the '158 Patent, either literally or under the doctrine of equivalents;

B.   Requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '158 Patent as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

C.   For such other and further relief, as may be just and equitable.

COMPLAINT FOR PATENT INFRINGEMENT

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DEMAND FOR TRIAL BY JURY

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Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby

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demands a jury trial on all issues and causes of action triable to a jury.

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Dated: April 17, 2018   Respectfully submitted,

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__/s/ Nicholas Ranallo_____

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Nicholas Ranallo, Attorney at Law
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COMPLAINT FOR PATENT INFRINGEMENT