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SECRET

on No. 3:11cv217

Civil Action No. 3:11cv217

COMPLAINT

NATURE OF THE ACTION

THE PARTIES

- 1 -

company that provides intelligent video software for security, public safety, business intelligence, process improvement and other technology.

3. Upon information and belief, Defendant Robert Bosch GmbH is a corporation organized and existing under the laws of Germany with its principal place of business at Platz 1, 70839 Gerlingen-Schillerhohe, Germany.

4. Upon information and belief, Defendant Bosch Security Systems, Inc. is a corporation organized and existing under the laws of New York with its principal place of business at 130 Perinton Parkway, Fairport, New York, 14450-9107. Upon information and belief, Bosch Security Systems, Inc. is an "overseas subsidiary/overseas affiliate" of Robert Bosch GmbH. Robert Bosch GmbH and Bosch Security Systems, Inc. will hereinafter be referred to collectively as "Bosch."

5. Upon information and belief, Defendant Samsung Group is a corporation organized and existing under the laws of South Korea with its principal place of business at 750 2-ga Taerpyong-ro, Seoul 100-742, Korea (South).

6. Upon information and belief, Defendant Samsung Techwin Co., Ltd. is a corporation organized and existing under the laws of South Korea with its principal place of business at 647-9, Yeoksam-Dong, Kangnam-gu, Seoul, 135, 080, Korea (South).

7. Upon information and belief, Samsung Opto-Electronics America, Inc. (d/b/a Samsung Techwin America) is a corporation organized and existing under the laws of New Jersey with its principal place of business at 100 Challenger Road, Suite 700, Ridgefield Park, NJ 07660. Upon information and belief, Samsung Opto-Electronics, America, Inc. is a subsidiary of Samsung Group. Samsung Group, Samsung Techwin Co., Ltd., Samsung Opto-

Electronics America, Inc. and Samsung Techwin America will hereinafter be referred to collectively as "Samsung."

8. Upon information and belief, Defendant Sony Corporation is a corporation organized and existing under the laws of Japan with its principal place of business at 1-7-1, Minato-ku, Tokyo, Japan.

9. Upon information and belief, Defendant Sony Electronics, Inc. is a corporation organized and existing under the laws of Delaware with its principal place of business at 16530 Via Esprillo, San Diego, California 92127. Upon information and belief, Sony Electronics, Inc. is a wholly-owned subsidiary of Sony Corporation. Sony Corporation and Sony Electronics, Inc. will hereinafter be referred to collectively as "Sony."

JURISDICTION AND VENUE

10. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.*

11. Personal jurisdiction over Defendants is consistent with the United States Constitution and § 8.01-328.1 of the Virginia Code Annotated because each Defendant has minimum contacts within the Eastern District of Virginia; each Defendant has purposefully availed itself of the privileges of conducting business in the Eastern District of Virginia; each Defendant has sought protection and benefit from the laws of the Commonwealth of Virginia; each Defendant regularly conducts business within the Commonwealth of Virginia; and each Defendant has committed and continues to commit acts of direct and indirect patent infringement in this district as alleged in this Complaint.

12. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c) and 1400(b) because Defendants have done business in this District; have committed acts of infringement within this District; and continue to commit acts of infringement in this District, entitling ObjectVideo to relief. More specifically, each Defendant directly and/or through intermediaries (including resellers or distributors) distributes, offers for sale, sells, and/or advertises its products and services in the Eastern District of Virginia.

BACKGROUND OF THE PATENTS-IN-SUIT

United States Patent No. 6,696,945

13. On October 9, 2001, Application No. 09/972,039 was filed before the United States Patent and Trademark Office ("USPTO"), and on February 24, 2004, the USPTO duly and legally issued United States Patent No. 6,696,945 (the "'945 Patent"), entitled "Video Tripwire." A copy of the '945 Patent is attached hereto as Exhibit A.

14. The co-inventors of the '945 Patent are Peter L. Venetianer, Mark C. Allmen, Paul C. Brewer, Andrew J. Chosak, John I.W. Clark, Matthew F. Frazier, Niels Haering, Tasuki Hirata, Caspar Horne, Alan J. Lipton, William E. Severson, James S. Sfekas, Thomas E. Slowe, Thomas M. Strat, John F. Tilki, and Zhong Zhang.

15. The inventors assigned all right, title and interest in the '945 Patent to DiamondBack Vision, Inc. A certified copy of this executed assignment is attached as Exhibit B. DiamondBack Vision, Inc. was later renamed as ObjectVideo and filed a Change of Name with the USPTO. A certified copy of this Change of Name is attached hereto as Exhibit C.

16. The '945 Patent discloses a method and system that captures video and then gathers and processes data based on this video. The system also permits the input of a virtual tripwire, and in some embodiments, determines if the virtual tripwire has been crossed, and once it is determined that the tripwire has been crossed, generates a response to notify, for example, a

user of that event. The technology disclosed in the '945 Patent has applications in many industries, including, but not limited to, security, public safety, business intelligence, and process improvement.

17. ObjectVideo currently owns all right, title, and interest in the '945 Patent, and pursuant to 35 U.S.C. § 154(a)(1), ObjectVideo has the right to exclude others from making, using, import, offering for sale, or selling the invention disclosed in the '945 Patent, including the right to bring this action for damages and injunctive relief.

18. The '945 Patent is valid and enforceable.

United States Patent No. 6,970,083

19. On November 12, 2003 Application No. 10/704,645 was filed before the PTO, and on November 29, 2005, the USPTO duly and legally issued United States Patent No. 6,970,083 (the "'083 Patent"), entitled "Video Tripwire." The '083 Patent is a continuation-in-part of Application No. 09/972,039, filed on October 9, 2001, which matured into the '945 Patent. A copy of the '083 Patent is attached hereto as Exhibit D.

20. The co-inventors of the '083 Patent are Peter L. Venetianer, Paul C. Brewer, Andrew J. Chosak, John I.W. Clark, Niels Haering, Alan J. Lipton, Gary Myers, Chung-Cheng Yen, and Pramod Kalapa.

21. The inventors assigned all right, title and interest in the '083 Patent to DiamondBack Vision, Inc. A certified copy of this executed assignment is attached as Exhibit E. DiamondBack Vision, Inc. was later renamed as ObjectVideo and filed a Change of Name with the USPTO. A certified copy of this Change of Name is attached hereto as Exhibit F.

22. The '083 Patent discloses a method and system that captures video and then gathers and processes data based on this video. The system also permits the input of a virtual tripwire, and in some embodiments, determines if the virtual tripwire has been crossed, and once it is determined that the tripwire has been crossed, generates a response to notify, for example, a user of that event. The input of the virtual tripwire is accomplished through a graphical user interface that includes allowing a user to draw a video tripwire. The technology disclosed in the '083 Patent has applications in many industries, including, but not limited to security, public safety, business intelligence, and process improvement.

23. ObjectVideo currently owns all right, title, and interest in the '083 Patent, and pursuant to 35 U.S.C. § 154(a)(1), ObjectVideo has the right to exclude others from making, using, offering for sale, or selling the invention disclosed in the '083 Patent, including the right to bring this action for damages and injunctive relief.

24. The '083 Patent is valid and enforceable.

United States Patent No. 7,613,324

25. On June 24, 2005, Application No. 11/165,182 was filed before the PTO, and on November 3, 2009, the USPTO duly and legally issued United States Patent No. 7,613,324 (the "'324 Patent"), entitled "Detection of Change in Posture in Video." A copy of the '324 Patent is attached hereto as Exhibit G.

26. The co-inventors of the '324 Patent are Peter L. Venetianer, Andrew J. Chosak, Niels Haering, Alan J. Lipton, Zhong Zhang, and Weihong Yin.

27. The inventors assigned all right, title and interest in the '324 Patent to ObjectVideo. A certified copy of this executed assignment is attached as Exhibit H.

28. The '324 Patent discloses a method and a system for detecting the change in posture of a person in a video data stream. When the change in posture reaches a certain threshold, a response is triggered to notify, for example, a user of that event. The technology disclosed in the '324 Patent has applications in many industries, including, but not limited to, security, public safety, business intelligence, and process improvement.

29. ObjectVideo currently owns all right, title, and interest in the '324 Patent, and pursuant to 35 U.S.C. § 154(a)(1), ObjectVideo has the right to exclude others from making, using, offering for sale, or selling the invention disclosed in the '324 Patent, including the right to bring this action for damages and injunctive relief.

30. The '324 Patent is valid and enforceable.

United States Patent No. 7,868,912

31. On April 5, 2005 Application No. 11/098,385 was filed before the PTO, and on January 11, 2011, the USPTO duly and legally issued United States Patent No. 7,868,912 (the "'912 Patent"), entitled "Video Surveillance System Employing Primitives." The '912 Patent is a continuation-in-part of Application No. 11/057,154, filed on February 15, 2005, which is a continuation-in-part of abandoned Application No. 09/987,707, filed on November 15, 2001, which is a continuation-in-part of Application No. 09/694,712, filed on October 24, 2000, which is now U.S. Patent No. 6,954,498. A copy of the '912 Patent is attached hereto as Exhibit I.

32. The co-inventors of the '912 Patent are Peter L. Venetianer, Alan J. Lipton, Andrew J. Chosak, Matthew F. Frazier, Niels Haering, Gary W. Myers, Weihong Yin, and Zhong Zhang.

33. The inventors assigned all right, title and interest in the '912 Patent to ObjectVideo. A certified copy of this executed assignment is attached as Exhibit J.

34. The '912 Patent discloses a method and a system for reducing the overall processing burden of a video surveillance system by, in some embodiments, eliminating the need for reprocessing video data. Specifically, the '912 Patent discloses a system that processes a video stream for attributes and then processes those attributes to determine whether a defined rule has been violated. The technology disclosed in the '912 Patent has applications in many industries, including, but not limited to security, public safety, business intelligence, and process improvement.

35. ObjectVideo currently owns all right, title, and interest in the '912 Patent, and pursuant to 35 U.S.C. § 154(a)(1), ObjectVideo has the right to exclude others from making, using, offering for sale, or selling the invention disclosed in the '912 Patent, including the right to bring this action for damages and injunctive relief.

36. The '912 Patent is valid and enforceable.

COUNT ONE

INFRINGEMENT OF U.S. PATENT NO. 6,696,945 **DEFENDANT BOSCH**

37. ObjectVideo hereby restates, realleges, and incorporates by reference the allegations of paragraphs 1 through 18 of this Complaint as if fully set forth herein.

38. Upon information and belief, Defendant Bosch has in the past and continues to offer for sale, sell, and import into the United States products having video analytics capabilities that both directly and indirectly infringe the '945 Patent in violation of 35 U.S.C. §§ 271(a) and 271(c).

39. More specifically, upon information and belief, Defendant Bosch has sold, offered for sale, and imported into the United States, including this judicial district, Internet Protocol ("IP") cameras containing the Bosch "Intelligent Video Analysis" ("IVA") software, including but not necessarily limited to IVA Version 4.0 and video encoders also containing Bosch's IVA software, including but not necessarily limited to Version 4.0 of the IVA software. Such infringing cameras include, but are not necessarily limited to, the following exemplary Bosch models: Dinion IP cameras, VG4 AutoDome IP cameras, FlexiDome IP cameras, and Extreme IP cameras including EX and ZX models (collectively "the Accused Bosch Camera Products"). Bosch's infringing encoders include, but are not necessarily limited to, the following: VideoJet X series encoders, VideoJet X SN series encoders, and VIP X1600 encoders (collectively "the Accused Bosch Encoder Products").

40. The Accused Bosch Camera Products, and any other camera products operating substantially similar to the Bosch IVA 4.0 cameras, directly infringe at least Claims 1, 5, 8, 11, 12, 25, 30, 33, and 35-37 of the '945 Patent in violation of 35 U.S.C. § 271(a). More specifically, the IVA software on the Accused Bosch Camera Products produces video output, performs calibration, and gathers and processes the video output. The software also permits a user to enter of at least one virtual tripwire.

41. Bosch was placed on notice of the '945 Patent at least as early as March 2004 as a result of its meeting with ObjectVideo and of its infringement of the '945 Patent upon the filing of this Complaint.

42. Bosch also indirectly infringes at least claims 1, 5, 8, 11, 12, 25, 30, 33, and 35-37 of the '945 Patent in violation of 35 U.S.C. § 271 (c) by instructing its end user customers to use the Accused Bosch Camera Products, including instructing its customers to connect the Accused

Bosch Camera Products to a personal computer such that at least the identified claims of the '945 Patent can be read on the combination of the Accused Bosch Camera Products and the personal computer. As directed by Bosch, the end users of the Accused Bosch Camera Products directly infringe at least claims 1, 5, 8, 11, 12, 25, 30, 33, and 35-37 of the '945 Patent by using the combined system, thereby making Bosch a contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the IVA software on the Accused Bosch Camera Products produces video output to the personal computer, which then performs calibration and gathers and processes the video output. The Bosch IVA software running on the personal computer permits a user to enter of at least one virtual tripwire.

43. Bosch also indirectly infringes at least claims 1, 5, 8, 11, 12, 25, 30, 33, and 35-37 of the '945 Patent in violation of 35 U.S.C. § 271 (c) by instructing its end user customers to use the Accused Bosch Encoder Products, including instructing its customers to connect the Accused Bosch Encoder Products to a device, such as a camera, that produces a video output for the encoder to receive. As directed by Bosch, the end users of the Accused Bosch Camera Products directly infringe at least claims 1, 5, 8, 11, 12, 25, 30, 33, and 35-37 of the '945 Patent by using the combined system, thereby making Bosch a contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the IVA software on the Accused Bosch Encoder Products receives video output, which then performs calibration and gathers and processes the video output. The Bosch IVA software running on the Accused Bosch Encoder Products permits a user to enter of at least one virtual tripwire.

44. The IVA 4.0 software's tripwire functionality comprises software that is not a staple item of commerce and does not have substantial noninfringing uses.

45. Upon information and belief, Defendant Bosch has knowledge of the infringement of the '945 Patent, yet Bosch continues to infringe the '945 Patent. Bosch's infringement of the '945 Patent is willful and deliberate, entitling ObjectVideo to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

46. Upon information and belief, the unlawful infringing activities by Defendant Bosch are continuing and will continue unless enjoined by this Court.

47. As a result of the infringing acts herein described, ObjectVideo has sustained damages and will continue to sustain damages in the future, including irreparable harm, unless Defendant Bosch is enjoined from infringing the '945 Patent.

COUNT TWO

INFRINGEMENT OF U.S. PATENT NO. 6,970,083 **DEFENDANT BOSCH**

48. ObjectVideo hereby restates, realleges, and incorporates by reference the allegations of paragraphs 1 through 12 and 19 through 24 of this Complaint as if fully set forth herein.

49. Upon information and belief, Defendant Bosch has in the past and continues to offer for sale, sell, and import into the United States products having video analytics capabilities that both directly and indirectly infringe the '083 Patent in violation of 35 U.S.C. §§ 271(a) and 271(c).

50. More specifically, upon information and belief, Defendant Bosch has sold, offered for sale, and imported into the United States, including this judicial district, Internet Protocol ("IP") cameras containing the Bosch "Intelligent Video Analysis" ("IVA"), including

but not necessarily limited to Version 4.0 of the IVA software and video encoders also containing Bosch's IVA software, including but not necessarily limited to Version 4.0 of the IVA software. Bosch's infringing cameras include, but are not necessarily limited to, the following exemplary Bosch models: Dinion IP cameras, VG4 AutoDome IP cameras, FlexiDome IP cameras, and Extreme IP cameras including EX and ZX models (collectively "the Accused Bosch Camera Products"). Bosch's infringing encoders include, but are not necessarily limited to, the following: VideoJet X series encoders, VideoJet X SN series encoders, and VIP X1600 encoders (collectively "the Accused Bosch Encoder Products").

51. The Accused Bosch Camera Products, and any other camera products operating substantially similar to the Bosch IVA 4.0 cameras, directly infringe at least Claims 1-6 and 28 of the '083 Patent in violation of 35 U.S.C. § 271(a). More specifically, the IVA software on the Accused Bosch Camera Products produces video output, performs calibration, and gathers and processes the video output. The Bosch software also includes a graphical user interface, which is adapted to enable a user to draw a vide tripwire.

52. Bosch was placed on notice of the '083 patent and of its infringement of the '083 Patent upon the filing of this Complaint.

53. Bosch also indirectly infringes at least claims 1-6 and 28 of the '083 Patent in violation of 35 U.S.C. § 271(c) by instructing its end user customers to use the Accused Bosch Camera Products, including instructing its customers to connect the Accused Bosch Camera Products to a personal computer such that the identified claims of the '083 patent can be read on the combination of the Accused Bosch Camera Products and the personal computer. As directed by Bosch, the end users of the Accused Bosch Camera Products directly infringe at least claims 1-6 and 28 of the '083 Patent by using the combined system, thereby making Bosch a

contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the IVA software on the Accused Bosch Camera Products produces video output to the personal computer, which then performs calibration, and gathers and processes the video output. The Bosch IVA software executing on the personal computer also includes a graphical user interface, which is adapted to enable a user to draw a video tripwire.

54. Bosch also indirectly infringes at least claims 1-6 and 28 of the '083 Patent in violation of 35 U.S.C. § 271 (c) by instructing its end user customers to use the Accused Bosch Encoder Products, including instructing its customers to connect the Accused Bosch Encoder Products to a device, such as a camera, that produces a video output for the encoder to receive. As directed by Bosch, the end users of the Accused Bosch Camera Products directly infringe at least claims 1-6 and 28 of the '083 Patent by using the combined system, thereby making Bosch a contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the IVA software on the Accused Bosch Encoder Products receives video output, which then performs calibration and gathers and processes the video output. The Bosch IVA software running on the Accused Bosch Encoder Products contains a graphical user interface that permits a user to draw a virtual tripwire.

55. The IVA 4.0 software's tripwire functionality comprises software that is not a staple item of commerce and does not have substantial noninfringing uses.

56. Upon information and belief, Defendant Bosch has knowledge of the infringement of the '083 Patent, yet Bosch continues to infringe the '083 Patent. Bosch's infringement of the '083 Patent is willful and deliberate, entitling ObjectVideo to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

57. Upon information and belief, the unlawful infringing activities by Defendant Bosch are continuing and will continue unless enjoined by this Court.

58. As a result of the infringing acts herein described, ObjectVideo has sustained damages and will continue to sustain damages in the future, including irreparable harm, unless Defendant Bosch is enjoined from infringing the '083 patent.

COUNT THREE

INFRINGEMENT OF U.S. PATENT NO. 7,613,324 **DEFENDANT BOSCH**

59. ObjectVideo hereby restates, realleges, and incorporates by reference the allegations of paragraphs 1 through 12 and 25 through 30 of this Complaint as if fully set forth herein.

60. Upon information and belief, Defendant Bosch has in the past and continues to offer for sale, sell, and import into the United States products having video analytics capabilities that both directly and indirectly infringe the '324 Patent in violation of 35 U.S.C. §§ 271(a) and 271(c).

61. More specifically, upon information and belief, Defendant Bosch has sold, offered for sale, and imported into the United States, including this judicial district, Internet Protocol ("IP") cameras containing the Bosch "Intelligent Video Analysis" ("IVA") software and video encoders also containing Bosch's IVA software, including but not necessarily limited to Version 4.0 of the IVA software. Such infringing cameras include, but are not necessarily limited to, the following exemplary Bosch models: Dinion IP cameras, VG4 AutoDome IP cameras, FlexiDome IP cameras, and Extreme IP cameras including EX and ZX models (collectively "the Accused Bosch Camera Products"). Bosch's infringing encoders include, but

are not necessarily limited to, the following: VideoJet X series encoders, VideoJet X SN series encoders, and VIP X1600 encoders (collectively “the Accused Bosch Encoder Products”).

62. The Accused Bosch Camera Products, the Accused Bosch Encoder Products, any other Bosch camera products operating substantially similar to the Bosch IVA-enabled cameras, and any other Bosch encoder products operating substantially similar to the Bosch IVA-enabled encoders directly infringe at least Claims 1-3 and 6-7 of the '324 Patent in violation of 35 U.S.C. § 271(a). More specifically, the Accused Bosch Camera Products and the Accused Bosch Encoder Products have a computer readable medium with the IVA software. The Bosch IVA software receives video data and detects and tracks human targets. The Bosch software also detects a change in a posture of a human target by detecting a change in the aspect ratio above a threshold that happens within a certain period of time.

63. Bosch was placed on notice of the '324 patent and of its infringement of the '324 patent upon the filing of this Complaint.

64. Bosch also indirectly infringes at least claims 1-3 and 6-7 of the '324 patent in violation of 35 U.S.C. § 271(c) at least by instructing its end user customers to use the Accused Bosch Camera Products and/or the Accused Bosch Encoder Products. As directed by Bosch, the end users of the Accused Bosch Camera Products and/or the Accused Bosch Encoder Products directly infringe at least claims 1-3 and 6-7 of the '324 patent by using these Bosch products, thereby making Bosch a contributory infringer in violation of 35 U.S.C. § 271(c).

65. The IVA 4.0 software's change in posture functionality comprises software that is not a staple item of commerce and does not have substantial noninfringing uses.

66. Upon information and belief, Defendant Bosch has knowledge of the infringement of the '324 Patent, yet Bosch continues to infringe the '324 Patent. Bosch's

infringement of the '324 Patent is willful and deliberate, entitling ObjectVideo to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

67. Upon information and belief, the unlawful infringing activities by Defendant Bosch are continuing and will continue unless enjoined by this Court.

68. As a result of the infringing acts herein described, ObjectVideo has sustained damages and will continue to sustain damages in the future, including irreparable harm, unless Defendant Bosch is enjoined from infringing the '324 Patent.

COUNT FOUR

INFRINGEMENT OF U.S. PATENT NO. 7,868,912 **DEFENDANT BOSCH**

69. ObjectVideo hereby restates, realleges, and incorporates by reference the allegations of paragraphs 1 through 12 and 31 through 36 of this Complaint as if fully set forth herein.

70. Upon information and belief, Defendant Bosch has in the past and continues to offer for sale, sell, and import into the United States products having video analytics capabilities that both directly and indirectly infringe the '912 Patent in violation of 35 U.S.C. §§ 271(a) and 271(c).

71. More specifically, upon information and belief, Defendant Bosch has sold, offered for sale, and imported into the United States, including this judicial district, IP cameras embedded with its IVA software (including but not necessarily limited to Version 4.0 of the IVA software), video encoders embedded with the same or substantially similar IVA software (including but not necessarily limited to Version 4.0 of the IVA software), and computer

workstations and servers with software (including but not necessarily limited to VIDOS Archive Player for forensic searching) for receiving and searching video information received from the IVA software. Such infringing cameras include, but are not necessarily limited to, the following exemplary Bosch models: Bosch Dinion IP cameras, Bosch VG4 AutoDome IP cameras, Bosch FlexiDome IP cameras, and Bosch Extreme IP cameras including EX and ZX models (collectively, “the Accused Bosch Camera Products”). Bosch’s infringing encoders include, but are not necessarily limited to, the following: VideoJet X10 encoders, VideoJet X20 encoders, and VideoJet X40 encoders, and VIP XI600 encoders (collectively, “the Accused Bosch Encoder Products”). Such infringing network recorders include, but are not necessarily limited to, the following exemplary Bosch models installed with VIDOS Archive Player software for forensic searching: 600 Series video recorders, 400 series video recorders, 700 Series Hybrid/Network Recorders, DiBOS 19 inch Digital Video Recorders, DVSA Premium Series Digital Video Storage Arrays, DLA-AIOU0 1200 Series IP Video Storage Appliances, DLA-AIOL0 1400 Series IP Video Storage Arrays, DLA-AIOL1 1400 Series IP Video Storage Arrays, DVSA Premium Series iSCSI Digital Video Storage Arrays, DSA-N2B20 iSCSI Disk Array Series, and N2B40 iSCSI Disk Array Series (collectively, “the Accused Bosch Recorder Products”). Such infringing management workstations include, but are not necessarily limited to, the following exemplary Bosch models installed with VIDOS Archive Player software for forensic searching: MHW-WZ2R0-EL Management Workstation, MHW-WZ2R0-NG Management Workstation, MHW-WZ2R0-PE Management Workstation, MHW-WZ4R0-HE Management Workstation, MHW-WZ4R0-NG Management Workstation, and MHW-WZ4R0-EE Management Workstation (collectively, the “Accused Bosch Workstation Products”).

72. The Accused Bosch Camera Products, and any other products operating substantially similar to the Bosch IVA 4.0 cameras, in combination with the Accused Bosch Workstation Products, and any other workstations substantially similar to the Bosch Management Workstation Products, directly infringe at least Claims 1-3 and 6-22 of the '912 Patent in violation of 35 U.S.C. § 271(a). In this accused Bosch system, the Bosch camera analyzes a video to determine the attributes of objects detected in the video. The Bosch Management Workstation is in communication with the Bosch camera over a communications link such that it receives the attributes. The Management Workstation determines an event by analyzing the attributes, and the Workstation provides at least information for a report to a user related to the event.

73. The Accused Bosch Camera Products, and any other products operating substantially similar to the Bosch IVA 4.0 cameras, in combination with the Accused Bosch Recorder Products, and any other network video recorders substantially similar to the Bosch Network Video Recorders, directly infringe at least Claims 1-3 and 6-22 of the '912 Patent in violation of 35 U.S.C. § 271(a). In this accused Bosch system, the Bosch camera analyzes a video to determine the attributes of objects detected in the video. The Bosch network video recorder is in communication with the Bosch camera over a communications link such that it receives the attributes. The network video recorder determines an event by analyzing the attributes, and the recorder provides at least information for a report to a user related to the event.

74. The Accused Bosch Encoder Products, and any other products operating substantially similar to the Bosch IVA 4.0-enabled encoders, in combination with the Accused Bosch Workstation Products, and any other workstations substantially similar to the Bosch Management Workstations, directly infringe at least Claims 1-3 and 6-22 of the '912 Patent in

violation of 35 U.S.C. § 271(a). In this accused Bosch system, the Bosch encoder analyzes a video to determine the attributes of objects detected in the video. The Bosch Management Workstation is in communication with the Bosch encoder over a communications link such that it receives the attributes. The Management Workstation determines an event by analyzing the attributes, and the Workstation provides at least information for a report to a user related to the event.

75. The Accused Bosch Encoder Products, and any other products operating substantially similar to the Bosch IVA 4.0-enabled encoders, in combination with the Accused Bosch Recorder Products, and any other network video recorders substantially similar to the Bosch Network Video Recorders, directly infringe at least Claims 1-3 and 6-22 of the '912 Patent in violation of 35 U.S.C. § 271(a). In this accused Bosch system, the Bosch encoder analyzes a video to determine the attributes of objects detected in the video. The Bosch network video recorder is in communication with the Bosch encoder over a communications link such that it receives the attributes. The network video recorder determines an event by analyzing the attributes, and the recorder provides at least information for a report to a user related to the event.

76. Bosch was placed on notice of the '912 Patent and of its infringement of the '912 Patent upon the filing of this Complaint.

77. Bosch also indirectly infringes at least claims 1-3 and 6-22 of the '912 Patent in violation of 35 U.S.C. § 271(c) by instructing its end user customers to use the Accused Bosch Camera Products and the Accused Bosch Encoder Products, including instructing its customers to connect the Accused Bosch Camera Products or the Accused Bosch Encoder Products to a personal computer that contains the Vidos Archive Player software for forensic searching such that the identified claims of the '912 Patent can be read on the combination of the Bosch camera

or encoder and the personal computer. As directed by Bosch, the end users of the Accused Bosch Camera Products or the Accused Bosch Encoder Products directly infringe at least claims 1-3 and 6-22 of the '912 Patent by using the combined system, thereby making Bosch a contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the Bosch camera or encoder analyzes a video to determine the attributes of objects detected in the video. The personal computer is in communication with the Bosch camera or encoder over a communications link such that it receives the attributes. The personal computer with Bosch software determines an event by analyzing the attributes, and the computer provides at least information for a report to a user related to the event.

78. The functionality of the Bosch products that infringes the '912 Patent is not a staple item of commerce and does not have substantial noninfringing uses.

79. Upon information and belief, Defendant Bosch has knowledge of the infringement of the '912 Patent, yet Bosch continues to infringe the '912 Patent. Bosch's infringement of the '912 Patent is willful and deliberate, entitling ObjectVideo to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

80. Upon information and belief, the unlawful infringing activities by Defendant Bosch are continuing and will continue unless enjoined by this Court.

81. As a result of the infringing acts herein described, ObjectVideo has sustained damages and will continue to sustain damages in the future, including irreparable harm, unless Defendant Bosch is enjoined from infringing the '912 Patent.

COUNT FIVE
INFRINGEMENT OF U.S. PATENT NO. 6,696,945
DEFENDANT SAMSUNG

82. ObjectVideo hereby restates, realleges, and incorporates by reference the allegations of paragraphs 1 through 18 of this Complaint as if fully set forth herein.

83. Upon information and belief, Defendant Samsung has in the past and continues to offer for sale, sell, and import into the United States products having video analytics capabilities that both directly and indirectly infringe the '945 Patent in violation of 35 U.S.C. §§ 271(a) and 271(c).

84. More specifically, upon information and belief, Defendant Samsung has sold, offered for sale, and imported into the United States, including this judicial district, cameras embedded with video analytics software. Such cameras include, but are not necessarily limited to, the following exemplary Samsung products: SNB-5000, SNB-3000, SNV-3080, SNV-5010, SND-5080, SND-5080F, and SNV-5080 (collectively "the Accused Samsung Camera Products").

85. The Accused Samsung Camera Products, and any other camera products operating substantially similar to these cameras, directly infringe at least Claims 1, 5, 11, 12, 24, 25, 30, 33, and 35-37 of the '945 Patent in violation of 35 U.S.C. § 271(a). More specifically, the video analytics software on the Accused Samsung Camera Products produces video output, performs calibration, and gathers and processes the video output. The Samsung software also permits a user to enter of at least one virtual tripwire.

86. Samsung was placed on notice of the '945 patent and its infringement of the '945 patent upon the filing of this Complaint.

87. Samsung also indirectly infringes at least claims 1-8, 11, 12, 24, 25, 30, 33, and 35-37 of the '945 Patent in violation of 35 U.S.C. § 271 (c) by instructing its end user customers to use the Accused Samsung Camera Products, including instructing its customers to connect the Accused Samsung Camera Products to a personal computer such that at least the identified claims of the '945 Patent can be read on the combination of the Accused Samsung Camera Products and the personal computer. As directed by Samsung, the end users of the Accused Samsung Camera Products directly infringe at least claims 1-8, 11, 12, 24, 25, 30, 33, and 35-37 of the '945 Patent by using the combined system, thereby making Samsung a contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the Samsung video analytics software on the Accused Samsung Camera Products produces video output to the personal computer, which then performs calibration and gathers and processes the video output. The Samsung software running on the personal computer permits a user to enter of at least one virtual tripwire.

88. The tripwire functionality of the Accused Samsung Camera Products comprises software that is not a staple item of commerce and does not have substantial noninfringing uses.

89. Upon information and belief, the unlawful infringing activities by Defendant Samsung are continuing and will continue unless enjoined by this Court.

90. As a result of the infringing acts herein described, ObjectVideo has sustained damages and will continue to sustain damages in the future, including irreparable harm, unless Defendant Samsung is enjoined from infringing the '945 patent.

COUNT SIX

INFRINGEMENT OF U.S. PATENT NO. 6,970,083
DEFENDANT SAMSUNG

91. ObjectVideo hereby restates, realleges, and incorporates by reference the allegations of paragraphs 1 through 12 and 19 through 24 of this Complaint as if fully set forth herein.

92. Upon information and belief, Defendant Samsung has in the past and continues to offer for sale, sell, and import into the United States products having video analytics capabilities that both directly and indirectly infringe the '083 Patent in violation of 35 U.S.C. §§ 271(a) and 271(c).

93. More specifically, upon information and belief, Defendant Samsung has sold, offered for sale, and imported into the United States, including this judicial district, cameras embedded with video analytics software. Such cameras include, but are not necessarily limited to, the following exemplary Samsung products: SNB-5000, SNB-3000, SNV-3080, SNV-5010, SND-5080, SND-5080F, and SNV-5080 (collectively "the Accused Samsung Camera Products").

94. The Accused Samsung Camera Products, and any other camera products operating substantially similar to these cameras, directly infringe at least Claims 1-6 and 28 of the '083 Patent in violation of 35 U.S.C. § 271(a). More specifically, the Samsung video analytics software on the Accused Samsung Camera Products produces video output, performs calibration, and gathers and processes the video output. The Samsung software also includes a graphical user interface, which is adapted to enable a user to draw a video tripwire.

95. Samsung was placed on notice of the '083 Patent and its infringement of the '083 Patent upon the filing of this Complaint.

96. Samsung also indirectly infringes at least Claims 1-6 and 28 of the '083 Patent in violation of 35 U.S.C. § 271 (c) by instructing its end user customers to use the Samsung Accused Camera Products to connect the Accused Samsung Camera Products to a personal computer such that the identified claims of the '083 Patent can be read on the combination of the Accused Samsung Camera Products and the personal computer. As directed by Samsung, the end users of the Accused Samsung Camera Products directly infringe at least Claims 1-6 and 28 of the '083 Patent by using the combined system, thereby making Samsung a contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the video analytics software on the Accused Samsung Camera Products produces video output to the personal computer, which then performs calibration, and gathers and processes the video output. The Samsung analytics software executing on the personal computer also includes a graphical user interface, which is adapted to enable a user to draw a video tripwire.

97. The tripwire functionality of the Accused Samsung Camera Products comprises software that is not a staple item of commerce and does not have substantial noninfringing uses.

98. Upon information and belief, the unlawful infringing activities by Defendant Samsung are continuing and will continue unless enjoined by this Court.

99. As a result of the infringing acts herein described, ObjectVideo has sustained damages and will continue to sustain damages in the future, including irreparable harm, unless Defendant Samsung is enjoined from infringing the '083 patent.

COUNT SEVEN

INFRINGEMENT OF U.S. PATENT NO. 6,696,945
DEFENDANT SONY

100. ObjectVideo hereby restates, realleges, and incorporates by reference the allegations of paragraphs 1 through 18 of this Complaint as if fully set forth herein.

101. Upon information and belief, Defendant Sony has in the past and continues to offer for sale, sell, and import into the United States products having video analytics capabilities that both directly and indirectly infringe the '945 Patent in violation of 35 U.S.C. §§ 271(a) and 271(c).

102. More specifically, upon information and belief, Defendant Sony has sold, offered for sale, and imported into the United States, including this judicial district cameras containing video analytics software. Such cameras include, but are not necessarily limited to, Sony cameras having DEPA technology, such as the following exemplary Sony products: SNC-CH140 DEPA Advanced Network Camera, SNC-DH140 Advanced Network Camera, SNC-CH240 Advanced Network Camera, SNC-CH180 Advanced Network Camera, SNC-CH280 Advanced Network Camera, SNC-RS44N Advanced Network Camera, SNC-RS46N Advanced Network Camera, SNC-RS84N Advanced Network Camera, SNC-RS86N Advanced Network Camera, SNC-RH124 Advanced Network Camera, SNC-RH164 Advanced Network Camera, SNC-DH240 Advanced Network Camera, SNC-DH140T Advanced Network Camera, SNC-DH240T Advanced Network Camera, SNC-DH180 Advanced Network Camera, and SNC-DH280 Advanced Network Camera (collectively "the Accused Sony Camera Products").

103. The Accused Sony Camera Products, and any other camera products operating substantially similar to the Sony DEPA cameras, directly infringe at least Claims 1, 5, 11-12, and 24-37 of the '945 Patent in violation of 35 U.S.C. § 271(a). More specifically, the video

analytics software on the Accused Sony Camera Products produces video output, performs calibration, and gathers and processes the video output. The Sony software also permits a user to enter of at least one virtual tripwire.

104. Sony was placed on notice of the '945 Patent at least as early as April 2004 as a result of its meeting with ObjectVideo and of its infringement of the '945 Patent upon the filing of this Complaint.

105. Sony also indirectly infringes at least claims 1-7, 11-12, and 24-37 of the '945 Patent in violation of 35 U.S.C. § 271 (c) by instructing its end user customers to use the Accused Sony Camera Products, including instructing its customers to connect the Accused Sony Camera Products to a personal computer such that the identified claims of the '945 Patent can be read on the combination of the Accused Sony Camera Products and the personal computer. As directed by Sony, the end users of the Accused Sony Camera Products directly infringe at least claims 1-7, 11-12, and 24-37 of the '945 Patent by using the combined system, thereby making Sony a contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the Sony video analytics software on the Accused Sony Camera Products produces video output to the personal computer, which then performs calibration and gathers and processes the video output. The Sony software running on the personal computer permits a user to enter of at least one virtual tripwire.

106. The tripwire functionality of the Accused Sony Camera Products comprises software that is not a staple item of commerce and does not have substantial noninfringing uses.

107. Upon information and belief, Defendant Sony has knowledge of the infringement of the '945 Patent, yet Sony continues to infringe the '945 Patent. Sony's infringement of the '945 Patent is willful and deliberate, entitling ObjectVideo to increased damages under 35

U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

108. Upon information and belief, the unlawful infringing activities by Defendant Sony are continuing and will continue unless enjoined by this Court.

109. As a result of the infringing acts herein described, ObjectVideo has sustained damages and will continue to sustain damages in the future, including irreparable harm, unless Defendant Sony is enjoined from infringing the '945 patent.

COUNT EIGHT

INFRINGEMENT OF U.S. PATENT NO. 6,970,083 **DEFENDANT SONY**

110. ObjectVideo hereby restates, realleges, and incorporates by reference the allegations of paragraphs 1 through 12 and 19 through 24 of this Complaint as if fully set forth herein.

111. Upon information and belief, Defendant Sony has in the past and continues to offer for sale, sell, and import into the United States products having video analytics capabilities that both directly and indirectly infringe the '083 Patent in violation of 35 U.S.C. §§ 271(a) and 271(c).

112. More specifically, upon information and belief, Defendant Sony has sold, offered for sale, and imported into the United States, including this judicial district cameras containing video analytics software. Such cameras include, but are not necessarily limited to, Sony cameras having DEPA technology, such as the following exemplary Sony products: SNC-CH140 DEPA Advanced Network Camera, SNC-DH140 Advanced Network Camera, SNC-CH240 Advanced Network Camera, SNC-CH180 Advanced Network Camera, SNC-CH280 Advanced Network

Camera, SNC-RS44N Advanced Network Camera, SNC-RS46N Advanced Network Camera, SNC-RS84N Advanced Network Camera, SNC-RS86N Advanced Network Camera, SNC-RH124 Advanced Network Camera, SNC-RH164 Advanced Network Camera, SNC-DH240 Advanced Network Camera, SNC-DH140T Advanced Network Camera, SNC-DH240T Advanced Network Camera, SNC-DH180 Advanced Network Camera, and SNC-DH280 Advanced Network Camera (collectively “the Accused Sony Camera Products”).

113. The Accused Sony Camera Products, and any other camera products operating substantially similar to the Accused Sony Camera Products, directly infringe at least Claims 1-6 and 28 of the '083 Patent in violation of 35 U.S.C. § 271(a). More specifically, the Sony video analytics software on the Accused Sony Camera Products produces video output, performs calibration, and gathers and processes the video output. The Sony software also includes a graphical user interface, which is adapted to enable a user to draw a vide tripwire.

114. Sony was placed on notice of the '083 patent and of its infringement of the '083 patent upon the filing of this Complaint.

115. Sony also indirectly infringes at least claims 1-6 and 28 of the '083 patent in violation of 35 U.S.C. § 271 (c) by instructing its end user customers to use the Accused Sony Camera Products, including instructing its customers to connect the Accused Sony Camera Products to a personal computer such that the identified claims of the '083 patent be read on the combination of the Accused Sony Camera Products and the personal computer. As directed by Sony, the end users of the Accused Sony Camera Products directly infringe at least claims 1-6 and 28 of the '083 patent by using the combined system, thereby making Sony a contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the video analytics software on the Accused Sony Camera Products produces video output to the personal computer, which then

performs calibration, and gathers and processes the video output. The Sony analytics software executing on the personal computer also includes a graphical user interface, which is adapted to enable a user to draw a video tripwire.

116. The tripwire functionality of the Accused Sony Camera Products comprises software that is not a staple item of commerce and does not have substantial noninfringing uses.

117. Upon information and belief, Defendant Sony has knowledge of the infringement of the '083 Patent, yet Sony continues to infringe the '083 Patent. Sony's infringement of the '083 Patent is willful and deliberate, entitling ObjectVideo to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

118. Upon information and belief, the unlawful infringing activities by Defendant Sony are continuing and will continue unless enjoined by this Court.

119. As a result of the infringing acts herein described, ObjectVideo has sustained damages and will continue to sustain damages in the future, including irreparable harm, unless Defendant Sony is enjoined from infringing the '083 patent.

COUNT NINE

INFRINGEMENT OF U.S. PATENT NO. 7,868,912 **DEFENDANT SONY**

120. ObjectVideo hereby restates, realleges, and incorporates by reference the allegations of paragraphs 1 through 12 and 31 through 36 of this Complaint as if fully set forth herein.

121. Upon information and belief, Defendant Sony has in the past and continues to offer for sale, sell, and import into the United States products having video analytics capabilities,

including DEPA Network Cameras, Network Surveillance Servers, and Intelligent Monitoring Software that directly and/or indirectly infringe the '912 Patent in violation of 35 U.S.C. §§ 271(a) and 271(c).

122. Claims 1, 2, and 4 of the '912 Patent are directly infringed, in violation of 35 U.S.C. § 271(a), by the combination of a Sony DEPA Network Camera in combination with a Sony Network Surveillance Server. Infringing Sony cameras include the following exemplary models: SNC-RX550N Network Camera, SNC-CS20 Network Camera, SNC-CS50N Network Camera, SNC-CM120 Network Camera, SNC-CH120 Network Camera, SNC-CH220 Network Camera, SNC-CH160 Network Camera, SNC-CH260 Network Camera, SNC-CH110 Network Camera, SNC-CH210 Network Camera, SNC-RZ50N Network Camera, SNC-RX530N Network Camera, SNC-RX570N Network Camera, SNC-DH120 Network Camera, SNC-DH220 Network Camera, SNC-DH110 Network Camera, SNC-DH210 Network Camera, SNC-DH120T Network Camera, SNC-DH220T Network Camera, SNC-DH160 Network Camera, SNC-DH260 Network Camera, SNC-DH110T Network Camera, SNC-DH210T Network Camera, SNC-DF50N Network Camera, SNC-DF80N Network Camera, SNC-DF85N Network Camera, SNC-DS10 Network Camera, SNC-DS60 Network Camera, SNC-DM110 Network Camera, and SNC-DM160 Network Camera. Infringing Sony servers include the following exemplary models: Sony NSR-1100 Network Surveillance Server, NSR-1200 Network Surveillance Server, NSR-1050H Network Surveillance Server, NSR-100 Network Surveillance Server, NSR-50 Network Surveillance Server, and NSR-25 Network Surveillance Server. In this accused Sony system, the Sony camera analyzes a video to determine the attributes of objects detected in the video. The Sony Network Surveillance Server is in communication with the Sony camera over a

communications link such that it receives the attributes. The Network Surveillance Server determines an event by analyzing the attributes, and the Server provides at least an alert to a user.

123. Sony was placed on notice of the '912 Patent and of its infringement of the '912 Patent upon the filing of this Complaint.

124. Claims 1, 2, and 4 of the '912 Patent are indirectly infringed, in violation of 35 U.S.C. § 271(c), by the combination of a Sony DEPA Network Camera in combination with the Sony Intelligent Monitoring Software installed on a Microsoft Windows server. Infringing Sony cameras include the following exemplary models: SNC-RX550N Network Camera, SNC-CS20 Network Camera, SNC-CS50N Network Camera, SNC-CM120 Network Camera, SNC-CH120 Network Camera, SNC-CH220 Network Camera, SNC-CH160 Network Camera, SNC-CH260 Network Camera, SNC-CH110 Network Camera, SNC-CH210 Network Camera, SNC-RZ50N Network Camera, SNC-RX530N Network Camera, SNC-RX570N Network Camera, SNC-DH120 Network Camera, SNC-DH220 Network Camera, SNC-DH110 Network Camera, SNC-DH210 Network Camera, SNC-DH120T Network Camera, SNC-DH220T Network Camera, SNC-DH160 Network Camera, SNC-DH260 Network Camera, SNC-DH110T Network Camera, SNC-DH210T Network Camera, SNC-DF50N Network Camera, SNC-DF80N Network Camera, SNC-DF85N Network Camera, SNC-DS10 Network Camera, SNC-DS60 Network Camera, SNC-DM110 Network Camera, and SNC-DM160 Network Camera ("Accused Sony DEPA Network Cameras"). Infringing Sony Intelligent Monitoring Software include the following exemplary models: IMZ-NS101, IMZ-NS101U, IMZ-NS104, IMZ-NS104U, IMZ-NS109, IMZ-NS109U, IMZ-NS116, IMZ-NS116U, IMZ-NS132, IMZ-NS132U, IMZ-RS401, IMZ-RS404, IMZ-RS409, IMZ-RS416, and IMZ-RS432 ("Accused Sony Intelligent Monitoring Software"). Sony indirectly infringes at least Claims 1, 2, and 4 of the '912 Patent in violation of

35 U.S.C. § 271 (c) by instructing its end user customers to use the Accused Sony DEPA Networks Cameras to connect the Accused Sony DEPA Cameras to a computer executing the Sony Intelligent Monitoring (“IM”) Software such that the identified claims of the ’912 patent can be read on the combination of the Accused Sony DEPA Cameras, Sony software, and the computer. As directed by Sony, the end users directly infringe at least claims 1, 2, and 4 of the ’912 patent by using the combined system, thereby making Sony a contributory infringer in violation of 35 U.S.C. § 271(c). More specifically, the Accused Sony DEPA Network Cameras analyze a video to determine the attributes of objects detected in the video. The personal computer with Sony IM software is in communication with the Accused Sony DEPA Network Cameras over a communications link such that it receives the attributes. The computer with Sony IM software determines an event by analyzing the attributes, and the computer provides at least an alert to a user.

125. Claims 6-11 of the ’912 Patent are directly infringed, in violation of 35 U.S.C. § 271, by a Sony Network Surveillance Server. Infringing Sony servers include, but are not necessarily limited to, the following exemplary models: Sony NSR-1100 Network Surveillance Server, NSR-1200 Network Surveillance Server, NSR-1050H Network Surveillance Server, NSR-100 Network Surveillance Server, NSR-50 Network Surveillance Server, and NSR-25 Network Surveillance Server. More specifically, the Sony server has an input that is in communication with a communications channel. This server receives a stream of detected attributes of one or more objects detected in video. The Sony server is configured to determine an event and provide an alert to a user.

126. Claims 12-22 of the ’912 Patent are directly infringed, in violation of 35 U.S.C. § 271(c), by a Sony DEPA Network Camera. Such infringing Sony cameras include, but are not

necessarily limited to, the following exemplary models: SNC-RX550N Network Camera, SNC-CS20 Network Camera, SNC-CS50N Network Camera, SNC-CM120 Network Camera, SNC-CH120 Network Camera, SNC-CH220 Network Camera, SNC-CH160 Network Camera, SNC-CH260 Network Camera, SNC-CH110 Network Camera, SNC-CH210 Network Camera, SNC-RZ50N Network Camera, SNC-RX530N Network Camera, SNC-RX570N Network Camera, SNC-DH120 Network Camera, SNC-DH220 Network Camera, SNC-DH110 Network Camera, SNC-DH210 Network Camera, SNC-DH120T Network Camera, SNC-DH220T Network Camera, SNC-DH160 Network Camera, SNC-DH260 Network Camera, SNC-DH110T Network Camera, SNC-DH210T Network Camera, SNC-DF50N Network Camera, SNC-DF80N Network Camera, SNC-DF85N Network Camera, SNC-DS10 Network Camera, SNC-DS60 Network Camera, SNC-DM110 Network Camera, and SNC-DM160 Network Camera. More specifically, the Sony Network Video Camera analyzes video to detect an object and creates a stream of attributes, which it transmits over a communications channel to another location for subsequent analysis.

127. Claims 6 and 8-10 of the '912 Patent are indirectly infringed, in violation of 35 U.S.C. 271(c), by Sony RealShot Manager Advanced Intelligent Monitoring Software installed on a Microsoft Windows server. Infringing Sony Intelligent Monitoring Software include, but are not necessarily limited to, the following exemplary models: IMZ-NS101, IMZ-NS101U, IMZ-NS104, IMZ-NS104U, IMZ-NS109, IMZ-NS109U, IMZ-NS116, IMZ-NS116U, IMZ-NS132, IMZ-NS132U, IMZ-RS401, IMZ-RS404, IMZ-RS409, IMZ-RS416, and IMZ-RS432. More specifically, the Sony software has an input that is in communication with a communications channel. This software receives a stream of detected attributes of one or more objects detected in video. The Sony software is configured to determine an event and provide an alert to a user.

128. The functionality of the Sony products that infringe the '912 Patent is not a staple item of commerce and does not have substantial noninfringing uses.

129. Upon information and belief, Defendant Sony has knowledge of the infringement of the '912 Patent, yet Sony continues to infringe the '912 Patent. Sony's infringement of the '912 Patent is willful and deliberate, entitling ObjectVideo to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

130. Upon information and belief, the unlawful infringing activities by Defendant Sony are continuing and will continue unless enjoined by this Court.

131. As a result of the infringing acts herein described, ObjectVideo has sustained damages and will continue to sustain damages in the future, including irreparable harm, unless Defendant Sony is enjoined from infringing the '912 Patent.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff ObjectVideo prays for entry of judgment in their favor and against Defendants and for an award of relief and damages as follows:

a. That Defendants have infringed the '945, '083, '324, and/or '912 Patents under 35 U.S.C. §§ 271(a) and/or 271 (c);

b. That Defendants' infringement of the '945, '083, and/or '912 Patents was willful and awarding treble damages under 35 U.S.C. § 284;

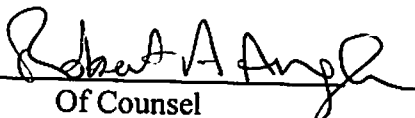
c. That Defendants be ordered to pay damages adequate to compensate Plaintiff for Defendants' infringement of the '945, '083, '324, and/or '912 Patents pursuant to 35 U.S.C. § 284, together with prejudgment and post-judgment interest, in an amount according to proof;

- d. That Defendants be ordered to submit an equitable accounting of damages for the period of infringement of the '945, '083, '324, and/or '912 Patents following the period of damages established by Plaintiff at trial;
- e. That Defendants, including their officers, agents, employees, and those acting in privity with them, be enjoined from further infringement and further contributory infringement of the '945, '083, '324, and/or '912 Patents pursuant to 35 U.S.C. § 283;
- f. That, if a permanent injunction is not granted, this Court determine the conditions for future infringement or grant such other relief as the Court deems appropriate;
- g. That Defendants be ordered to pay Plaintiff's attorneys' fees pursuant to 35 U.S.C. § 285;
- h. That Defendants be ordered to pay prejudgment interest;
- i. That Defendants be ordered to pay all costs associated with this action; and
- j. That ObjectVideo be granted such other and additional relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38(b), ObjectVideo hereby demands a trial by jury of all issues triable of right by a jury.

OBJECTVIDEO, INC.

By 
Of Counsel

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