

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TECHNOLOGY LICENSING	)	
CORPORATION,	)	
	)	CIVIL ACTION NO. 1:12-cv-1444
Plaintiff,	)	
	)	
v.	)	
	)	<b>JURY TRIAL DEMANDED</b>
JVC AMERICAS CORPORATION,	)	
	)	
Defendant.	)	
	)	
	)	

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**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

In this action for patent infringement, Plaintiff Technology Licensing Corporation (“TLC”) complains of Defendant JVC Americas Corporation as follows:

**JURISDICTION AND VENUE**

1. This is a claim for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code § 1 *et seq.* This Court has exclusive original jurisdiction over the subject matter of this Complaint under 28 U.S.C. §§ 1331 and 1338(a).

2. Venue is proper under 28 U.S.C. §§ 1391 and 1400(b) because the Defendant is subject to personal jurisdiction here, does business in this judicial district, and has committed acts of infringement in this judicial district.

**PARTIES**

3. TLC is a Nevada corporation and has its principal place of business at 711 South Carson Street, Suite 6, Carson City, Nevada, 89701. TLC owns the full and exclusive right, title and interest in and has standing to sue for infringement of United States Patent Nos. 6,141,057, “Apparatus and Method for Maintaining Synchronization of Multiple Delayed Signals of

Different Types;” 5,946,049, “Apparatus and Method for Synchronizing Multiple Asynchronous Signals;” 5,550,594, “Apparatus and Method for Synchronizing Asynchronous Signals;” and 6,469,741, “Apparatus and Method for Synchronizing Television Signals.” The patents are referred to below as the ‘057, the ‘049, the ‘594 and the ‘741 patents, respectively.

4. JVC Americas Corporation (“JVC Americas”) sells various home and professional electronic products including video recorders, televisions, DVD players and the like. JVC Americas has an office at 1700 Valley Road, Wayne, N.J., 07470. JVC Americas has another office at 905 Meridian Lakes Drive, Suite 120, Aurora, Illinois, 60504. JVC Americas offers for sale, and sells nationwide, including substantial business in this judicial district, products that are covered by at least claims 1, 3, 4, 6, 8, 9, 10, 14, 15, 16, 35, 36, 37, 38, 39, 40, 41, 42, 43, 61, 62 and 66 of the ‘057 Patent, including the Black Crystal 3000 and 3001 series high-definition televisions, Blu-Ray DVD players such as the Models XV-BP1 and XV-BP11, professional HD monitors such as the GD-463D10U, the Reference series home video projectors, home theater projectors such as the DLA-RS45 and HD D-ILA series, and Everio hybrid camcorders, such as the GD-HD5US, and any products employing version 1.3 or later of the HDMI standard. Additional products may be identified pursuant to discovery.

5. JVC Americas also sells products that are covered by at least claims 7, 8, 9, 10, 11, 12, 15, 17, 22, 23, 24, 25, 26, 28 and 31 of the ‘049 patent, including the Black Crystal 3000 and 3001 series high-definition televisions, Blu-Ray DVD players such as the Models XV-BP1 and XV-BP11, professional HD monitors such as the GD-463D10U, the Reference series home video projectors, home theater projectors such as the DLA-RS45 and HD D-ILA series, and Everio hybrid camcorders, such as the GD-HD5US, and any products employing version 1.3 or later of the HDMI standard. Additional products may be identified pursuant to discovery.

6. JVC Americas also sells products that are covered by at least claims 1, 2, 4, 6, 7, 8, 9, 10, 12, 14, 15, 16, 17, 19, 22, 24, 25, 27, 29, 30, 31, 32, 33 and 36 of the '594 patent, including the Black Crystal 3000 and 3001 series high-definition televisions, Blu-Ray DVD players such as the Models XV-BP1 and XV-BP11, professional HD monitors such as the GD-463D10U, the Reference series home video projectors, home theater projectors such as the DLA-RS45 and HD D-ILA series, and Everio hybrid camcorders, such as the GD-HD5US, and any products employing version 1.3 or later of the HDMI standard. Additional products may be identified pursuant to discovery.

7. JVC Americas also sells products that are covered by at least claims 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 13, 14, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26, 27, 28, 30, 31, 33, 52, 53, 54, 55, 56, 57, 58, 59, 60 and 61 of the '741 patent, including the Black Crystal 3000 and 3001 series high-definition televisions, Blu-Ray DVD players such as the Models XV-BP1 and XV-BP11, professional HD monitors such as the GD-463D10U, the Reference series home video projectors, home theater projectors such as the DLA-RS45 and HD D-ILA series, and Everio hybrid camcorders, such as the GD-HD5US, and any products employing version 1.3 or later of the HDMI standard. Additional products may be identified pursuant to discovery.

### **PATENT INFRINGEMENT**

8. TLC owns all right, title, and interest in and has standing to sue for damages for any past, present and future infringement of the '057 Patent, the '049 patent, the '594 patent and the '741 patent.

9. Upon information and belief, JVC Americas has made, used, offered for sale, sold, and/or imported products including those described in paragraph 4 above. These acts by JVC Americas have directly infringed at least claims 1, 3, 4, 6, 8, 9, 10, 14, 15, 16, 35 to 43, 61,

62 and 66 of the '057 patent within the meaning of 35 U.S.C. §271(a). JVC Americas has induced infringement of the same claims within the meaning of 35 U.S.C. §271(b).

10. Upon information and belief, JVC Americas has made, used, offered for sale, sold, and/or imported products including those described in paragraph 5 above. These acts by JVC Americas have directly infringed at least claims 7, 8, 9, 10, 11, 12, 15, 17, 22, 23, 24, 25, 26, 28 and 31 of the '049 patent within the meaning of 35 U.S.C. §271(a). JVC Americas has induced infringement of the same claims within the meaning of 35 U.S.C. §271(b).

11. Upon information and belief, JVC Americas has made, used, offered for sale, sold, and/or imported products including those described in paragraph 6 above. These acts by JVC Americas have directly infringed at least claims 1, 2, 4, 6, 7, 8, 9, 10, 12, 14, 15, 16, 17, 19, 22, 24, 25, 27, 29, 30, 31, 32, 33 and 36 of the '594 patent within the meaning of 35 U.S.C. §271(a). JVC Americas has induced infringement of the same claims within the meaning of 35 U.S.C. §271(b).

12. Upon information and belief, JVC Americas has made, used, offered for sale, sold, and/or imported products including those described in paragraph 7 above. These acts by JVC Americas have directly infringed at least claims 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 13, 14, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26, 27, 28, 30, 31, 33, 52, 53, 54, 55, 56, 57, 58, 59, 60 and 61 of the '741 patent within the meaning of 35 U.S.C. §271(a). JVC Americas has induced infringement of the same claims within the meaning of 35 U.S.C. §271(b).

13. JVC Americas' infringement of the '057, '049, '594, and 741 patents has injured TLC, and TLC is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

**RELIEF SOUGHT**

WHEREFORE, TLC respectfully requests this Court enter judgment against the Defendant, and against its subsidiaries, successors, parents, affiliates, officers, directors, agents, servants, employees, and all persons in active concert or participation with them, as follows:

- A. The entry of final judgment in favor of TLC.
- B. An award to TLC of such damages as it shall prove at trial against Defendant JVC Americas that is adequate to compensate for its infringement of the '057, '049, 594, and '741 patents, said damages to be no less than a reasonable royalty, together with prejudgment interest from the date infringement of each of the patents began;
- C. A determination that this case is exceptional pursuant to 35 U.S.C. § 285 and an award to TLC of the costs of this action and its reasonable attorneys' fees; and
- D. Such other relief as TLC is entitled to recover under any applicable law and as this Court or a jury may determine to be proper and just.

**JURY DEMAND**

TLC hereby demands a trial by jury on all issues triable to a jury in this case.

Dated: February 29, 2012

Respectfully submitted,

/s/ Joseph N. Hosteny  
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