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11 **IN THE U.S. DISTRICT COURT FOR THE**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 **RED.COM, LLC**, a Nevada
14 limited liability company,

15
16 Plaintiff,

17 vs.

18
19 **NIKON CORPORATION**, a
20 Japanese corporation and **NIKON**
21 **INC.**, a New York corporation,
22 Defendants.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

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1 Plaintiff Red.com, LLC (“RED”) complains of Defendants Nikon
2 Corporation and Nikon Inc. (collectively, “Nikon”) and alleges patent
3 infringement as follows.

4 THE PARTIES

5 1. RED is a limited liability corporation organized under the laws of
6 the State of Nevada. It is registered with the State of California and maintains an
7 active business in this district. Its principal place of business is located within this
8 district at 94 Icon, Foothill Ranch, CA 92610. It has and continues to transact
9 business in this judicial district.

10 2. Nikon Corporation is a corporation organized and existing under the
11 laws of Japan, with its principal place of business located at 2-15-3, Konan,
12 Minato-ku, Tokyo 108-6290, Japan. Nikon Inc. is a corporation organized and
13 existing under the laws of New York, with its principal place of business located
14 at 1300 Walt Whitman Rd, Melville, NY 11747. Nikon Inc. is a wholly owned
15 subsidiary of Nikon Corporation.

16 3. Nikon Corporation and Nikon Inc. have and continue to transact
17 business in this judicial district, including, but not limited to, by advertising,
18 marketing, selling, distributing, and servicing its cameras directly or indirectly
19 through affiliates, entities, and operations based in California and in this judicial
20 district.

21 JURISDICTION AND VENUE

22 4. This Court has original jurisdiction over this patent infringement
23 action under 28 U.S.C. §§ 1331 and 1338.

24 5. Venue is proper over Nikon Corporation. 28 U.S.C. § 1391(c)(3). It
25 directs business to this judicial district, markets its products here, and puts its
26 products in the stream of commerce intending that they be offered for sale,
27 purchased, acquired, and/or used within this judicial district. Venue is also proper
28 over Nikon Inc. 28 U.S.C. § 1400(b). It has a regular and established place of

1 business, including for the service and repair of cameras, located in this judicial
2 district at 6420 Wilshire Boulevard, Suite 100, Los Angeles, CA 90048 and 1907
3 East 29th Street, Signal Hill, CA 90755, to which Nikon Inc. has previously
4 admitted. *See Carl Zeiss AG v. Nikon Corp.*, No. 17-7083 (C.D. Cal.), ECF No.
5 35 ¶ 10 (Nov. 2, 2017) (“Defendants [Nikon Corporation, Sendai Nikon
6 Corporation, and Nikon Inc.] admit that Nikon Corporation sells cameras to
7 Nikon Inc. in Japan, which Nikon Inc. then imports into the United States.”); *id.*
8 ¶ 9 (“Defendants admit that Nikon Inc. has conducted and continues to conduct
9 business in the Central District of California. Defendants admit that Nikon Inc.
10 imports, services and sells digital camera products in the Central District of
11 California.”).

12 GENERAL ALLEGATIONS

13 6. Since at least 2006, RED has been and continues to be actively
14 engaged specifically in the design, development, manufacture, and sale of high
15 performance digital still and motion cinematography cameras, video equipment
16 and accessories, digital editing software, video players as well as generally in
17 imaging format technology used in the dissemination, broadcast, or transmission
18 of video.

19 7. Since the introduction of its revolutionary RED ONE[®] camera,
20 RED’s products have been used to film blockbuster movies, as well as many other
21 movies and television series. The RED cameras and products have revamped the
22 movie making process and industry.

23 **RED’s Inventions Disclosed in U.S. Patent No. 7,830,967**

24 8. RED owns by assignment U.S. Patent No. 7,830,967 (the “’967
25 patent”), entitled “Video Camera.” It issued on November 9, 2010.

26 9. A true and correct copy of the patent is attached hereto as Exhibit
27 RED-PAT-1.

28

1 10. The '967 patent discloses, for example, a video camera that can be
2 configured to highly compress video data in a visually lossless manner. The
3 camera can be configured to transform blue and red image data in a manner that
4 enhances the compressibility of the data. The data can then be compressed and
5 stored in this form. This allows a user to reconstruct the red and blue data to obtain
6 the original raw data for a modified version of the original raw data that is visually
7 lossless when demosaiced. Additionally, the data can be processed so the green
8 image elements are demosaiced first and then the red and blue elements are
9 reconstructed based on values of the demosaiced green image elements.

10 **RED's Inventions Disclosed in U.S. Patent No. 8,174,560**

11 11. RED owns by assignment U.S. Patent No. 8,174,560 (the "'560
12 patent"), entitled "Video Camera." It issued on May 8, 2012. An Ex Parte
13 Reexamination Certificate U.S. 8,174,560 C1 later issued on it on May 16, 2014.

14 12. A true and correct copy of the patent, including the Ex Parte
15 Reexamination Certificate, is attached hereto as Exhibit RED-PAT-2.

16 13. The '560 patent discloses, for example, a video camera that can be
17 configured to highly compress video data in a visually lossless manner. The
18 camera can be configured to transform blue and red image data in a manner that
19 enhances the compressibility of the data. The data can then be compressed and
20 stored in this form. This allows a user to reconstruct the red and blue data to obtain
21 the original raw data for a modified version of the original raw data that is visually
22 lossless when demosaiced. Additionally, the data can be processed so the green
23 image elements are demosaiced first and then the red and blue elements are
24 reconstructed based on values of the demosaiced green image elements.

25 **RED's Inventions Disclosed in U.S. Patent No. 9,245,314**

26 14. RED owns by assignment U.S. Patent No. 9,245,314 (the "'314
27 patent"), entitled "Video Camera." It issued on January 26, 2016.

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1 15. A true and correct copy of the patent is attached hereto as Exhibit
2 RED-PAT-3.

3 16. The '314 patent discloses, for example, a video camera configured
4 to capture, compress, and store video image data in a memory of the video camera
5 at a rate of at least about twenty-three frames per second. The video image data
6 can be mosaiced image data, and the compressed, mosaiced image data remains
7 substantially visually lossless upon decompression and demosaicing.

8 **RED's Inventions Disclosed in U.S. Patent No. 9,436,976**

9 17. RED owns by assignment U.S. Patent No. 9,436,976 (the "'976
10 patent"), entitled "Video Camera." It issued on September 6, 2016.

11 18. A true and correct copy of the patent is attached hereto as Exhibit
12 RED-PAT-4.

13 19. The '976 patent discloses, for example, a video camera that can be
14 configured to highly compress video data in a visually lossless manner. The
15 camera can be configured to transform blue and red image data in a manner that
16 enhances the compressibility of the data. The data can then be compressed and
17 stored in this form. This allows a user to reconstruct the red and blue data to obtain
18 the original raw data for a modified version of the original raw data that is visually
19 lossless when demosaiced. Additionally, the data can be processed so the green
20 image elements are demosaiced first, and then the red and blue elements are
21 reconstructed based on values of the demosaiced green image elements.

22 **RED's Inventions Disclosed in U.S. Patent No. 9,521,384**

23 20. RED owns by assignment U.S. Patent No. 9,521,384 (the "'384
24 patent"), entitled "Green Average Subtraction in Image Data." It issued on
25 December 13, 2016.

26 21. A true and correct copy of the patent is attached hereto as Exhibit
27 RED-PAT-5.

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