

1 Terrence Mazura (Bar No. 101075)  
2 *tmazura@euslaw.com*  
3 414 West Fourth Street  
4 Second Floor  
5 Santa Ana, California 92701  
6 Telephone: 714.550.5011

7 George Moschopoulos (Bar No. 249905)  
8 *GeorgeM@logmapc.com*  
9 Law Office of George Moschopoulos, APC  
10 34197 Pacific Coast Highway, Suite 100  
11 Dana Point, CA 92629  
12 Telephone: 949.498.5413  
13 Facsimile: 949.272.0428

14 Gary E. Shoffner (Bar No. 73663)  
15 *ges@shoffnerlawfirm.com*  
16 414 West Fourth Street  
17 Second Floor  
18 Santa Ana, California 92701  
19 Telephone: (714) 550-5010  
20 Attorneys for the Plaintiff RICMIC LLC

21 UNITED STATES DISTRICT COURT  
22 SOUTHERN DISTRICT OF CALIFORNIA

23 RICMIC LLC, a California limited  
24 liability company,  
25 Plaintiff,  
26 v.  
27 VIGIL HEALTH SOLUTIONS, INC., a  
28 British Columbia corporation; SAN  
DIEGO HEBREW HOMES, a California  
corporation dba SEACREST VILLAGE  
RETIREMENT COMMUNITIES,  
Defendants.

Case No.: '22CV190 BEN MSB

COMPLAINT FOR PATENT  
INFRINGEMENT

DEMAND FOR JURY TRIAL  
PURSUANT TO FED. RULE CIV.  
PROCEDURE 38(B) AND LOCAL  
RULE 38.1

1 Plaintiff, RICMIC LLC, alleges and incorporates by reference each exhibit attached  
2 to this complaint as follows:

3 **JURISDICTION AND VENUE**  
4

5 1. This is an action seeking damages and other relief arising out of  
6 infringement by defendant of U.S. Patent No. 9,305,450 B2 (“the ‘450 patent”), and  
7 U.S. Patent No. 10,380,873 B1 (“the ‘873 patent”) (collectively, the “Asserted Patents”),  
8 which disclose an "Interactive Wireless Life Safety Communications System," some  
9 embodiments of which are commonly called a “nurse call” system.

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

13 3. This Court has personal jurisdiction over defendant SAN DIEGO HEBREW  
14 HOMES, a California corporation dba SEACREST VILLAGE RETIREMENT  
15 COMMUNITIES (“Seacrest”), which conducts continuous and systematic business in  
16 California, including in this judicial district. Defendant Seacrest imports and uses the  
17 infringing products at issue in this case, including the Vigil Wireless Nurse Call System,  
18 Vitality Wireless Call System, Memory Care System and Essential Core system and  
19 hybrid combinations of those various systems (collectively, “Vigil Platform”) within this  
20 judicial district and elsewhere. Further, defendant Seacrest has notice of the Asserted  
21 Patents and uses, induces its customers' use of, and/or contributes to its customers' use of  
22 the infringing products at issue in this case and performance of one or more patented  
23 methods of the Asserted Patents in this judicial district. Venue is proper within this  
24 judicial district under 28 U.S.C. §1400(b) because Defendant Seacrest has committed acts  
25 of infringement in this judicial district and has a regular and established place of business  
26 within this judicial district at 211 Saxony Rd., Encinitas, California 92024.

27 4. This Court has personal jurisdiction over defendant VIGIL HEALTH  
28 SOULTIONS INC. (“Vigil”), which on information and belief conducts continuous and

1 systematic business in California, including in this judicial district by selling infringing  
2 products to defendant Seacrest. Defendant Vigil exports into this judicial district and on  
3 information and belief, sells, offers to sell and uses the infringing products at issue in this  
4 case, including the Vigil Platform within this judicial district. Further, Vigil has notice of  
5 the Asserted Patents and uses, induces its customers' use of, and/or contributes to its  
6 customers' use of the infringing products at issue in this case and performance of one or  
7 more patented methods of the Asserted Patents in this judicial district. Venue is proper  
8 within this judicial district under 28 U.S.C. §1391(c)(3) because Defendant Vigil is a  
9 foreign corporation that has committed acts of infringement in this judicial district as  
10 described in this Complaint and is otherwise subject to personal jurisdiction in this  
11 judicial district.

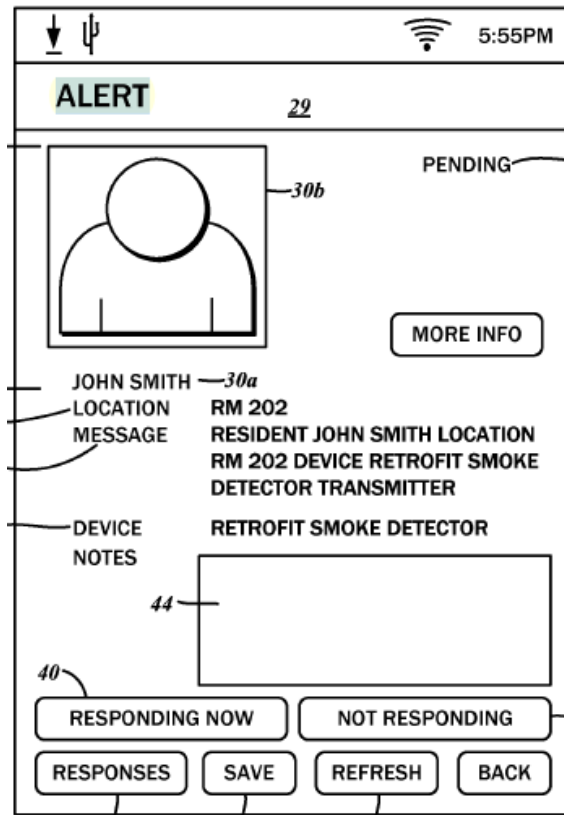
### 12 13 PARTIES

14  
15 5. Plaintiff RICMIC LLC (“RICMIC”) is a California limited liability company  
16 in good standing with its principal place of business in Orange County in the Central  
17 District of California. RICMIC is the owner of the Asserted Patents and the assignee of  
18 all claims for damages and infringement of each of the Asserted Patents.

19 6. Plaintiff is informed and believes and thereon alleges that defendant San  
20 Diego Hebrew Homes doing business as Seacrest Village Retirement Communities is a  
21 corporation organized under the laws of the State of California with its principal place of  
22 business in San Diego County in the city of Encinitas, California.

23 7. Plaintiff is informed and believes and thereon alleges that defendant Vigil, is a  
24 corporation organized under the laws of British Columbia, Canada with its principal  
25 place of business at 2102 - 4464 Markham Street, Victoria British Columbia V8Z 7X8.  
26  
27  
28





The embodiment described enables caregivers to respond to the alarm notifications via an “action status response” (e.g., select between “Responding Now” and “Not Responding”) and to communicate with other caregivers, residents and administrators via the central server, thereby providing feedback and alert response status updates to administrators and other caregivers, and also enables coordinated caregiver response to the emergency alert, resulting in enhanced resident safety, all of which are improvements over existing nurse call systems that lack the above-described interaction, information exchange and bi-directional communication described in plaintiff’s invention. The patented invention provides substantial information delivery benefits, logging, recording and reporting functionality, and overcomes other functional and technical limitations inherent in one-way pager, two-way radio and cellular phone “nurse call” and other call systems commonly used in assisted living facilities.

9. On April 5, 2016, the ‘450 patent, titled “Interactive Wireless Life Safety Communications System,” was duly and lawfully issued by the United States Patent and

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