

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

**ROTHSCHILD BROADCAST
DISTRIBUTION SYSTEMS, LLC,**

Plaintiff,

v.

**ZOOM VIDEO COMMUNICATIONS,
INC.,**

Defendant.

CIVIL ACTION NO. _____

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Rothschild Broadcast Distribution Systems, LLC (“Plaintiff” or “Rothschild Broadcast Distribution Systems”) files this complaint against Zoom Video Communications, Inc. (“Zoom”) for infringement of U.S. Patent No. 8,856,221 (hereinafter the “’221 Patent”) and alleges as follows:

PARTIES

1. Plaintiff is a Texas limited liability company with an office at 1801 NE 123 Street, Suite 314, Miami, FL 33181.
2. On information and belief, Defendant is a Delaware corporation, with a place of business at 7601 E. Technology Way, 3rd Floor, Denver, CO 80237. On information and belief, Defendant may be served through its agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, 35 U.S.C. § 271 et seq. Plaintiff is seeking damages, as well as attorney fees and costs.

4. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents).

5. On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in the District.

7. Venue is proper in this District under 28 U.S.C. §1400(b) because Defendant is deemed to be a resident in this District. Alternatively, acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District.

BACKGROUND

8. On October 7, 2014, the United States Patent and Trademark Office ("USPTO") duly and legally issued the '221 Patent, entitled "System and Method for Storing Broadcast Content in a Cloud-Based Computing Environment" after the USPTO completed a full and fair examination. The '221 Patent is attached as Exhibit A.

9. Rothschild Broadcast Distribution Systems is currently the owner of the '221 Patent.

10. Rothschild Broadcast Distribution Systems possesses all rights of recovery under the '221 Patent, including the exclusive right to recover for past, present and future infringement.

11. The '221 Patent contains thirteen claims including two independent claims (claims 1 and 7) and eleven dependent claims.

COUNT ONE
(Infringement of United States Patent No. 8,856,221)

12. Plaintiff refers to and incorporates the allegations in Paragraphs 1 - 11, the same as if set forth herein.

13. This cause of action arises under the patent laws of the United States and, in particular under 35 U.S.C. §§ 271, *et seq.*

14. Defendant has knowledge of its infringement of the '221 Patent, at least as of the service of the present complaint.

15. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 7, of the '221 Patent by making, using, importing, selling, and/or offering for media content storage and delivery systems and services covered by one or more claims of the '221 Patent.

16. Accordingly, Defendant has infringed, and continues to infringe, the '221 Patent in violation of 35 U.S.C. § 271.

17. Defendant sells, offers to sell, and/or uses media content storage and delivery systems and services, including, without limitation, the CuriosityStream streaming platform, and any similar products ("Product"), which infringes at least Claim 7 of the '221 Patent.

18. The Product practices a method of storing (e.g., cloud storage) media content (e.g. and recorded music) and delivering requested media content to a consumer device. Certain aspects of these elements are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.

Overview

Cloud recording is automatically enabled for all paid subscribers. When you record a meeting and choose Record to the Cloud, the video, audio, and chat text are recorded in the Zoom cloud. The recording files can be downloaded to a computer or streamed from a browser.

Source: <https://support.zoom.us/hc/en-us/articles/203741855-Cloud-recording>

Overview

You can record your Zoom meeting or webinar locally to your computer or to the Zoom cloud if you are a licensed user. Files stored on the cloud can be accessed on your desktop or from the web. Locally recorded meetings and webinars can only be accessed on the computer that recorded the meeting. This article covers finding and viewing recordings from the Zoom client or the Zoom web portal.

Source: <https://support.zoom.us/hc/en-us/articles/206277393-Finding-and-Viewing-Recordings>

Finding and viewing recordings

Viewing your recordings on the Zoom client will show all cloud recordings done by this user and any local recordings by this user on this computer. It will not show local recordings done on a different computer, even if the same Zoom account was used.

Source: <https://support.zoom.us/hc/en-us/articles/206277393-Finding-and-Viewing-Recordings>

- Cloud recordings will only have the option to **Open** the recording. If you click **Open**, it will open your default web browser to the recording files on the Zoom web portal.

Source: <https://support.zoom.us/hc/en-us/articles/206277393-Finding-and-Viewing-Recordings>

Recording on iOS and Android

Overview

You can record your meeting or webinar to the Zoom cloud from your mobile device with the Zoom app. Cloud recording allows you to view, share, and download your recordings from your Zoom account. Learn more about Cloud Recording.

Source: <https://support.zoom.us/hc/en-us/articles/203066759-Recording-on-iOS-and-Android>

Cloud recording storage capacity

The following table goes over the amount of storage capacity available for each plan:

Plan Type	Included Storage Capacity
Pro	1 GB/Pro User
Business	1 GB/Pro User
Education	0.5 GB/Pro User
Zoom Rooms	1 GB/Zoom Room

Note: An email alert will be sent to the account owner when usage is at 80% of the subscribed storage limit. If the storage limit is reached during a recording, the meeting will continue to record until it is ended.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.