UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

LIGHTSIDE TECHNOLOGIES, LLC, Plaintiff, v. CURTIS INTERNATIONAL LTD., Defendant.	Case No. _____

COMPLAINT - JURY TRIAL DEMANDED

Plaintiff, LIGHTSIDE TECHNOLOGIES, LLC ("Lightside" or "Plaintiff"), for its complaint against CURTIS INTERNATIONAL LTD. ("Curtis" or "Defendant") alleges:

NATURE OF THE ACTION

1. Pursuant to 35 U.S.C. § 271, this is a civil action for patent infringement of United States Patent No. 8,842,727, ('727 Patent) United States Patent No. 5,999,220 ('220 Patent), United States Patent No. 6,370,198 ('198 Patent), and United States Patent No. 8,228,979 ('979 Patent) (collectively, the "Patents-in-Suit").

2. A copy of the '727 Patent is attached hereto as Exhibit A; a copy of the '220 Patent is attached hereto as Exhibit B; a copy of the '198 Patent is attached hereto as Exhibit C; a copy of the '979 Patent is attached hereto as Exhibit D.

PARTIES

3. Plaintiff Lightside is a Texas limited liability company with a principal place of business at 700 Lavaca St., Suite 1401, Austin, TX 78701-3101.

4. Plaintiff is the owner by assignment of the '727 Patent, the '220 Patent, the '198 Patent, and the '979 Patent, with sole rights to enforce Patents-in-Suit and to sue infringers.

5. Defendant Curtis is a Canadian limited company with its principal place of business in Toronto, Ontario, Canada. Upon information and belief Defendant is registered to do business in Florida.

6. Defendant Curtis's products include a variety of monitors, televisions and networked video products, including products sold under the brand name ProScan.

JURISDICTION AND VENUE

7. Pursuant to 28 U.S.C. §§ 1331 and 1338(a), this Court has original jurisdiction over the subject matter of this action because this is an action arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et. seq.*

8. This court has personal jurisdiction over Defendant because Defendant conducts business in this Judicial District and infringing activity alleged herein took place in this Judicial District. Further, the exercise of personal jurisdiction comports with Due Process under the United States Constitution.

9. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(c).

BACKGROUND

10. Ken Washino is the inventor of the inventions claimed and disclosed in the Patents-in-Suit.

11. Mr. Washino is the epitome of the ingenious tinkerer who used inventive skills and a deep understanding of the industry to resolve a long-standing problem that succeeded where others had failed.

12. Mr. Washino was born in Aichi Prefecture, Japan, on February 21, 1953. His parents operated a small commercial farm in this rural area. He became interested in communications and electronics at an early age, acquiring an amateur ham radio license by the time he was thirteen years old. During his junior high school and high school years, he built a transmitter and receiver from salvaged parts of an old tube television. From such experiences, he learned the basics of analog communications.

13. In 1974, Mr. Washino found a position as an audio recording engineer with a Japanese documentary film company working in the U.S. This expanded to other production and post-production tasks. During the years that Mr. Washino worked in this business, he gained a working knowledge of film production and of production and post-production processes.

14. After Mr. Washino returned to Japan, he earned an Electronics Engineering degree from Nihon Kogakuin Technical College in Tokyo in 1979, and in 1981 acquired a first class broadcast engineering license. By that time, Mr. Washino was already working as a camera design engineer for Ikegami, a Japanese manufacturer of high-end video cameras. In 1985, he was appointed Video Field Sales Engineer and sent to the U.S. This experience enabled Mr. Washino to acquire a deep insight into the competitive market for equipment and services and to appreciate the needs of and problems encountered by video professionals. Mr. Washino then decided to establish himself in the U.S. permanently and formed his own video services company, focused on video production, post-production, and video cassette duplication in New York City.

15. By late 1986, Mr. Washino had acquired the market knowledge, technical skills, and financial resources to begin working on some of the ideas he had to improve efficiency and preserve quality in video field production. He identified the need for a universal camera control system and developed a prototype. Subsequent experimentation with early digital video devices

soon led to his 1992 inventions for Video Field Production, Video Monitoring and Conferencing, and PC-Based Audio/Video Production. In 1989, Mr. Washino began working on high-speed video duplication and filed his first patent application in 1993.

16. From then on, Mr. Washino developed a long series of inventions related to video production, post-production and signal distribution that could accommodate the coming digital and High-Definition "multiple format" future.

17. By October 2014, Mr. Washino had been granted twenty U.S. patents on inventions for which he is the inventor or co-inventor, with fourteen foreign equivalents.

18. The '727 Patent, '220 Patent, '198 Patent and '979 Patent are directed to the field of video production, photographic image processing, and computer graphics. The inventions disclosed relate to multi-format audio/video production.

19. Upon information and belief, Curtis made, sold, offered for sale, used, and/or imported products in the United States that implement the inventive concept of the Patents-in-Suit, including by way of example, Curtis' ProScan-branded products, including but not limited to ProScan HDTV products and other similar television products (the "Accused Products")

COUNT I: DIRECT INFRINGEMENT OF THE '727 PATENT

20. The allegations contained in the preceding paragraphs 1-19 are hereby re-alleged as if fully set forth herein.

21. The '727 Patent is titled "Wide-Band Multi-Format Audio/Video Production System With Frame-Rate Conversion."

22. Claim 1 of the '727 Patent states:

> A method performed by a video apparatus, comprising:
>
> receiving compressed video from a source;

decompressing the compressed video content to generate uncompressed video content in an internal format having a frame rate of 24 frames per second (fps) comprising progressive frames of pixel image data having an original pixel resolution;

buffering progressive frames of pixel image data in a high-capacity memory buffer supporting asynchronous random read and write access;

processing the progressive frames of pixel image data in the buffered progressive frames to perform a frame rate conversion from 24 fps to a higher output frame rate; and

outputting a digital HDTV video signal configured to display the video content on an HDTV at the output frame rate, wherein the digital HDTV video signal is a progressive signal having a pixel resolution of at least 1920x1080 pixels.

Claim 5 of the '727 Patent states:

The method of claim **1**, wherein the original pixel resolution is less than 1920x1080 pixels, the method further comprising employing pixel interpolation hardware to perform an up-conversion of the original pixel resolution to output a digital HDTV video signal having a pixel resolution of 1920x1080 pixels.

Claim 6 of the '727 Patent states:

The method of claim **1**, wherein the source comprises one of a cable or satellite broadcast source.

Claim 7 of the '727 Patent states:

The method of claim **1**, wherein the source comprises a DVD-type video disk, and the compressed video content is received by reading video content stored on the DVD-type video disk.

Claim 9 of the '727 Patent states:

The method of claim **1**, further comprising performing inter-frame interpolation of progressive frame pixel image data to perform the frame rate conversion.

Claim 11 of the '727 Patent states:

A video apparatus, comprising:

means for at least one of receiving or retrieving compressed video data;

a high-capacity memory buffer supporting asynchronous random read and write access;

digital signal processing circuitry; and

a graphics processor;

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