

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

QUANTUM IMAGING LLC,

Plaintiff,

v.

**SONY GROUP CORPORATION; SONY
CORPORATION OF AMERICA; SONY
INTERACTIVE ENTERTAINMENT INC.;
SONY INTERACTIVE ENTERTAINMENT
LLC; AND BLUEPOINT GAMES, INC.**

Defendants.

Civil Action No. 6:22-cv-573

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT
AND DEMAND FOR JURY TRIAL**

Plaintiff Quantum Imaging LLC files this Complaint for Patent Infringement and Damages against Defendants Sony Group Corporation, Sony Corporation of America, Sony Interactive Entertainment Inc., Sony Interactive Entertainment LLC, and Bluepoint Games, Inc. and would respectfully show the Court as follows:

PARTIES

1. Plaintiff Quantum Imaging LLC (“Quantum” or “Plaintiff”) is a Wyoming Limited Liability Company. Quantum is the assignee of the four patents-in-suit (see ¶ 66), which relate to, among other things and without limitation, inventions related to devices and programs that offer functionality providing users the ability to engage in business-related transactions and other functionalities while playing games and other functionalities.

2. Defendant Sony Group Corporation is a corporation organized and existing under the laws of Japan with its principal executive offices at 1-7-1 Konan Minato-ku, Tokyo, 108-0075

Japan. Defendant Sony Group Corporation engages in business in the State of Texas but, upon information and belief, does not maintain a regular place of business in the State or a designated agent for service of process. Therefore, pursuant to § 17.044 of the Tex. Civ. Prac. & Rem. Code, Defendant Sony Group Corporation has designated the Secretary of State as its agent for service of process and may be served with process through its counsel or by serving the Secretary of State. The Secretary of State may forward service to Defendant Sony Group Corporation at its home office address located at 1-7-1 Konan Minato-ku, Tokyo, 108-0075 Japan.

3. Defendant Sony Corporation of America is a corporation organized and existing under the laws of the State of New York with its principal executive offices at 25 Madison Avenue, New York, NY 10010. On information and belief, Defendant Sony Corporation of America is the U.S. headquarters of Defendant Sony Group Corporation. Defendant Sony Corporation of America may be served through its registered agent, Corporation Service Company at 80 State Street, Albany, NY 12207.

4. Defendant Sony Interactive Entertainment Inc. is a corporation organized and existing under the laws of Japan with its principal place of business at 1-7-1 Konan Minato-ku, Tokyo, 108-0075 Japan. Defendant Sony Interactive Entertainment Inc. is also a corporation organized and existing under the laws of the State of Delaware. Defendant Sony Interactive Entertainment Inc. may be served through its registered agent, Corporation Service Company, at 251 Little Falls Drive, Wilmington, Delaware 19808. On information and belief, Defendant Sony Interactive Entertainment Inc. is a subsidiary of Defendant Sony Group Corporation.

5. Defendant Sony Interactive Entertainment LLC is a limited liability company organized and existing under the laws of the State of California. Defendant Sony Interactive Entertainment LLC is registered to do business in Texas and may be served at 211 E 7th Street,

Suite 620, Austin Texas, 78701. On information and belief, Sony Interactive Entertainment LLC is a subsidiary of Defendant Sony Group Corporation.

6. Defendant Bluepoint Games, Inc. (“Bluepoint”) is a corporation organized under the laws of the State of Texas with principal place of business at 5000 Plaza on the Lake, Austin, TX 78746, and may be served via its registered agent, Corporation Service Company D/B/A CSC-Lawyers Inc. at 211 E 7th Street, Suite 620, Austin Texas, 78701. On information and belief, Bluepoint Games Inc. is part of PlayStation Studios (formerly SCE Worldwide Studios and SIE Worldwide Studios), which is a division of Defendant Sony Interactive Entertainment LLC and/or Defendant Sony Interactive Entertainment Inc.

7. On information and belief, Sony Group Corporation, Sony Corporation of America, Sony Interactive Entertainment Inc., Sony Interactive Entertainment LLC, and Bluepoint Games Inc. (collectively referred to as “Sony” or “Defendants”) directly and/or indirectly develop, design, manufacture, distribute, market, offer to sell and/or sell infringing products and services in the United States, including in the Western District of Texas, and otherwise direct infringing activities to this District in connection with their products and services as set forth in this complaint.

JURISDICTION

8. This civil action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*, including without limitation 35 U.S.C. §§ 271, 281, 283, 284, and 285. This is a patent infringement lawsuit over which this Court has subject matter jurisdiction under, *inter alia*, 28 U.S.C. §§ 1331, 1332, and 1338(a).

9. This United States District Court for the Western District of Texas has general and specific personal jurisdiction over Defendants because, directly or through intermediaries,

Defendants have committed acts within the District giving rise to this action and are present in and transact and conduct business in and with residents of this District and the State of Texas.

10. Quantum's causes of action arise, at least in part, from Defendants' contacts with and activities in this District and the State of Texas.

11. Defendants have committed acts of infringing the patents-in-suit within this District and the State of Texas by making, using, selling, offering for sale, and/or importing in or into this District and elsewhere in the State of Texas, products claimed by the patents-in-suit, including without limitation products made by practicing the claimed methods of the patents-in-suit. Defendants, directly and through intermediaries, make, use, sell, offer for sale, import, ship, distribute, advertise, promote, and/or otherwise commercialize such infringing products into this District and the State of Texas. Defendants regularly conduct and solicit business in, engage in other persistent courses of conduct in, and/or derive substantial revenue from goods and services provided to residents of this District and the State of Texas.

12. This Court has personal jurisdiction over Defendants pursuant to TEX. CIV. PRAC. & REM. CODE § 17.041 *et seq.*

13. Personal jurisdiction exists over Defendants because Defendants have minimum contacts with this forum as a result of business regularly conducted within the State of Texas and within this district, and, on information and belief, specifically as a result of, at least, committing the tort of patent infringement within Texas and this District.

14. This Court also has personal jurisdiction over Defendants, in part, because Defendants do continuous and systematic business in this District, including by providing infringing products and services to the residents of the Western District of Texas that Defendants

knew would be used within this District, and by soliciting business from the residents of the Western District of Texas.

15. Defendants are further subject to personal jurisdiction in this Court because, *inter alia*, Defendants through agents regularly solicit and transact business in the Western District of Texas, and have an established place of business in the Western District of Texas. Accordingly, this Court's jurisdiction over the Defendants comports with the constitutional standards of fair play and substantial justice and arises directly from the Defendants' purposeful minimum contacts with the State of Texas.

16. This Court also has personal jurisdiction over Defendants, because Defendants have made its products available within this District.

17. Venue is proper in this Court under 28 U.S.C. §§ 1391, and 1400(b).

18. For example, Bluepoint maintains its principal place of business at 5000 Plaza on the Lake, Austin, Texas 78746.

19. Defendants have posted over 100 opportunities for employment in this District from January 1, 2022, until the date of this Complaint.

20. As of the date of this Complaint, via the PlayStation.com website, Defendants are seeking to immediately hire at least 12 positions in Austin:¹

¹ <https://www.playstation.com/en-us/corporate/playstation-careers/>

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