

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

REALTIME ADAPTIVE STREAMING LLC,

Plaintiff,

v.

SONY ELECTRONICS INC., and  
SONY CORPORATION

Defendants.

Case No. \_\_\_\_\_

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT**

This is an action for Patent infringement arising under the Patent Laws of the United States of America, 35 U.S.C. § 1 *et seq.* in which Plaintiff Realtime Adaptive Streaming LLC (“Plaintiff” or “Realtime”) makes the following allegations against Defendants Sony Electronics, Inc. and Sony Corporation (collectively “Defendants” or “Sony”).

**PARTIES**

1. Realtime is a Texas limited liability company. Realtime has a place of business at 1828 E.S.E. Loop 323, Tyler, Texas 75701. Realtime has researched and developed specific solutions for data compression, including, for example, those that increase the speeds at which data can be stored and accessed. As recognition of its innovations rooted in this technological field, Realtime holds multiple United States Patents and pending Patent applications.

2. Defendant Sony Electronics, Inc. is a Delaware corporation, with its principal place of business at 16535 Via Esprillo, San Diego, California 92127. Sony Electronics Inc. may be served with process by serving its registered agent, Corporation

Service Company at 251 Little Falls Drive, Wilmington, Delaware 19808.

3. Defendant Sony Corporation is a Japanese corporation, with its corporate headquarters located at 1-7-1 Konan, Minato-ku, Tokyo, 108-0075, Japan. Sony Corporation may be served with process under the Delaware long arm statute.

4. Sony Electronics Inc. resides in this District because Sony Electronics Inc. is incorporated in Delaware. Sony Corporation is a foreign corporation and therefore can be sued in this District. Defendants offer their products and/or services, including those accused herein of infringement, to customers and potential customers located in Delaware and in this District.

#### **JURISDICTION AND VENUE**

5. This action arises under the Patent laws of the United States, Title 35 of the United States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendants in this action because Defendants have committed acts within the District of Delaware giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Defendants would not offend traditional notions of fair play and substantial justice. Defendants have also committed and continue to commit acts of infringement in this District by, among other things, offering to sell and selling products and/or services that infringe the asserted Patents.

7. Venue is proper in this district, *e.g.*, under 28 U.S.C. § 1400(b). Defendants reside in this District because they are incorporated in Delaware. Furthermore, upon information and belief, Defendants have transacted business in the

District of Delaware and have committed acts of direct and indirect infringement in the District of Delaware.

**THE PATENTS-IN-SUIT**

8. This action arises under 35 U.S.C. § 271 for Sony's infringement of Realtime's United States Patent Nos. 7,386,046 (the "'046 Patent"), 8,634,462 (the "'462 Patent"), 8,929,442 (the "'442 Patent"), 8,934,535 (the "'535 Patent"), 9,578,298 (the "'298 Patent"), 9,762,907 (the "'907 Patent"), and 9,769,477 (the "'477 Patent") (collectively, the "Patents-In-Suit").

9. The '046 Patent, titled "Bandwidth Sensitive Data Compression and Decompression," was duly and properly issued by the United States Patent and Trademark Office ("USPTO") on June 10, 2008. A copy of the '046 Patent is attached hereto as Exhibit A. Realtime is the owner and assignee of the '046 Patent and holds the right to sue for and recover all damages for infringement thereof, including past infringement.

10. The '462 Patent, titled "Quantization for Hybrid Video Coding," was duly and properly issued by the USPTO on January 21, 2014. A copy of the '462 Patent is attached hereto as Exhibit B. Realtime is the owner and assignee of the '462 Patent and holds the right to sue for and recover all damages for infringement thereof, including past infringement.

11. The '442 Patent, titled "System and method for video and audio data distribution," was duly and legally issued by the USPTO on January 6, 2015. A true and correct copy of the '442 Patent is included as Exhibit C. Realtime is the owner and assignee of the '442 Patent and holds the right to sue for and recover all damages for

infringement thereof, including past infringement.

12. The '535 Patent, titled "Systems and methods for video and audio data storage and distribution," was duly and properly issued by the USPTO on January 13, 2015. A copy of the '535 Patent is attached hereto as Exhibit D. Realtime is the owner and assignee of the '535 Patent and holds the right to sue for and recover all damages for infringement thereof, including past infringement.

13. The '298 Patent, titled "Method for Decoding 2D-Compatible Stereoscopic Video Flows," was duly and properly issued by the USPTO on February 21, 2017. A copy of the '298 Patent is attached hereto as Exhibit E. Realtime is the owner and assignee of the '298 Patent and holds the right to sue for and recover all damages for infringement thereof, including past infringement.

14. The '907 Patent, titled "System and Methods for Video and Audio Data Distribution," was duly and properly issued by the USPTO on September 12, 2017. A copy of the '907 Patent is attached hereto as Exhibit F. Realtime is the owner and assignee of the '907 Patent and holds the right to sue for and recover all damages for infringement thereof, including past infringement.

15. The '477 Patent, titled "Video data compression systems," was duly and properly issued by the USPTO on September 19, 2017. A copy of the '477 Patent is attached hereto as Exhibit G. Realtime is the owner and assignee of the '477 Patent and holds the right to sue for and recover all damages for infringement thereof, including past infringement.

**COUNT I**  
**INFRINGEMENT OF U.S. PATENT NO. 7,386,046**

16. Plaintiff re-alleges and incorporates by reference the foregoing paragraphs,

as if fully set forth herein.

17. On information and belief, Sony has made, used, offered for sale, sold and/or imported into the United States Sony products that infringe the '046 Patent, and continues to do so. By way of illustrative example, these infringing products include, without limitation, Sony's video security camera series, including Minidomes series cameras SNC-VM772R, SNC-VM641, SNC-EM641, SNC-VM642R, SNC-EM642R, SNC-VM632R, SNC-VM602R, SNC-VM631, SNC-VM601, SNC-VM630, SNC-VM600, SNC-EM632RC, SNC-EM602RC, SNC-EM631, SNC-EM601, SNC-EM630, SNC-EM600, SNC-XM631, SNC-XM632, SNC-XM636, SNC-XM637, SNC-HM662, SNC-DH280, SNC-DH240T, SNC-DH140T, SNC-DH240, SNC-DH140, SNC-DH260, SNC-DH160, SNC-DH220T, SNC-DH120T, SNC-DH220, SNC-DH120, SNC-DH210T, SNC-DH110T, SNC-DH210, SNC-DH110, SNC-ZM551, SNC-ZM550; Fixed series cameras SNC-VB770, SNC-VB640, SNC-EB640, SNC-VB642D, SNC-EB642R, SNC-VB635, SNC-VB630, SNC-VB600, SNC-VB632D, SNC-EB632R, SNC-EB602R, SNC-EB630, SNC-EB600, SNC-EB630B, SNC-EB600B, SNC-CX600W, SNC-CX600, SNC-CH280, SNC-CH180, SNC-CH240, SNC-CH140, SNC-CH260, SNC-CH160, SNC-CH220, SNC-CH120, SNC-CH110, SNC-ZB550; and Pan Tilt Zoom series cameras SNC-WR632C, SNC-WR602C, SNC-WR602, SNC-WR630, SNC-WR600, SNC-ER585, SNC-ER580, SNC-EP580, SNC-ER550, SNC-EP550, SNC-ER520, SNC-EP520, SNC-RS86N, SNC-RS46N; other Pan/Tilt/Zoom cameras (for Broadcast & Production) SRG360SHE, BRCH900/PAC2, and BRCH900; the cameras ILCE-7RM3, ILCE-7RM2; Sony's interchangeable-lens cameras, compact cameras; Sony camcorders, action cameras, motion cameras, film cameras, digital film cameras, music video recorders,

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