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(See Signature Page for Names and Addresses
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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CASCADES PROJECTION LLC,

Plaintiff,

vs.

CHRISTIE DIGITAL SYSTEMS USA,
INC.,

Defendant.

Case No. 8:15-CV-00050

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Plaintiff Cascades Projection LLC (“Cascades”), by its undersigned attorney,
for its complaint against defendant Christie Digital Systems USA, Inc. (“Christie”),
hereby alleges as follows:

1. This is an action for patent infringement arising under the patent laws
of the United States, Title 35 of the United States Code.

PARTIES

2. Plaintiff Cascades is an Illinois limited liability company having its
principal place of business at 500 Skokie Boulevard, Suite 250, Northbrook, IL
60062. Cascades is the exclusive licensee and holder of all substantial rights to
U.S. Patent Number 7,688,347 (“the ‘347 patent”).

3. Defendant Christie Digital Systems USA, Inc. is a corporation
organized and existing under the laws of California, with its principal place of

1 business located in Cypress, California. Christie transacts substantial business,
2 either directly or through its agents, on an ongoing basis in this judicial district and
3 elsewhere in the United States.

4 **JURISDICTION AND VENUE**

5 4. This complaint states claims arising under the patent laws of the United
6 States. Plaintiff Cascades asserts causes of action under 35 U.S.C. § 271 for
7 infringement of its patent. This Court has original and exclusive subject matter
8 jurisdiction over this claim pursuant to 28 U.S.C. §§ 1331 and 1338(a).

9 5. This Court has personal jurisdiction over the defendant pursuant to Fed.
10 R. Civ. P. 4(k)(1)(A) and California's long arm statute, Cal. Code Civ. P. § 410.10.

11 6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and
12 1400(b).

13 **BACKGROUND**

14 7. Eugene Dolgoff is an instrumental figure in the development of
15 holography and video projection systems. In 1971, Dolgoff invented a technique
16 for holographic transfer printing—a technique still used on credit cards today.
17 Throughout the 1970s and 1980s, Dolgoff consulted for industry and the military
18 and developed three-dimensional X-rays, CAT-scan, ultrasound, and MRI
19 technologies. In 1984, Dolgoff built the world's first single-panel LCD digital
20 video projector. Dolgoff's work led to him being selected as a member of the
21 American Electronics Association High-Definition TV Task Force and the National
22 Association of Photographic Manufacturers Standards Subcommittee IT 7-3, which
23 defined the standards for fixed resolution electronic projectors.

24 8. Among his innovations, Dolgoff developed several techniques to
25 increase the efficiency of light use in digital projection systems. Early projection
26 systems used light inefficiently, causing significant amounts of light from a
27 projector's lamp to be wasted. The result was a dim image, difficult to see without
28 turning off any other light sources in the room. Furthermore, early projection

1 systems did not use light uniformly across the image—causing the image to be dim
2 around its outer edge. Nor did they attempt to evenly disperse the color of the light
3 emanating from its light source.

4 9. Dolgoff developed several optical techniques to increase the efficiency
5 of light use, and the uniformity of brightness and color, in digital projection
6 systems.

7 10. Dolgoff's research led to the issuance of United States Patent No.
8 7,688,347. The '347 patent was duly and legally issued on March 30, 2010 for an
9 invention entitled "High-Efficiency Display System Utilizing an Optical Element to
10 Reshape Light with Color and Brightness Uniformity." A true and correct copy of
11 the '347 patent is attached hereto as Exhibit A.

12 11. Dolgoff is the sole owner of the '347 patent.

13 12. On September 19, 2014, Dolgoff executed an Exclusive License
14 Agreement with Cascades. The Exclusive License Agreement granted Cascades a
15 non-revocable exclusive license with all substantial rights in the '347 patent, in
16 consideration for which, among other things, Dolgoff is entitled to receive a
17 percentage of the licensing revenues.

18 **COUNT 1 – INFRINGEMENT OF U.S. PATENT NO. 7,688,347**

19 13. Christie has infringed and continues to infringe one or more claims of
20 the '347 patent by its manufacture, use, sale, importation, and/or offer for sale of
21 certain digital projector systems, including but not limited to Christie's CP2210
22 projector. Christie is liable for its infringement of the '347 patent pursuant to 35
23 U.S.C. § 271.

24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiff Cascades requests entry of judgment in its favor and
26 against Christie as follows:

27 a. Declaring that Christie has infringed U.S. Patent No. 7,688,347;
28

1 b. Awarding the damages arising out of Christie's infringement of U.S.
2 Patent No. 7,688,347 to Cascades, together with prejudgment and post-judgment
3 interest, in an amount according to proof;

4 c. Awarding attorneys' fees pursuant to 35 U.S.C. § 285 or as otherwise
5 permitted by law; and

6 d. Awarding such other costs and further relief as the Court may deem
7 just and proper.

8
9 Dated: January 13, 2015

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By: */s/ Marc M. Seltzer*

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PROJECTION LLC

JURY DEMAND

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Cascades respectfully requests a trial by jury on all issues.

Dated: January 13, 2015

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