

1 John J. Edmonds (State Bar No. 274200)
2 jedmonds@cepiplaw.com
3 COLLINS EDMONDS POGORZELSKI
4 SCHLATHER & TOWER, PLLC
5 1851 East First Street, Suite 900
6 Santa Ana, California 92705
7 Telephone: (951) 708-1237
8 Facsimile: (951) 824-7901

9 Attorney for Plaintiff,
10 **DIGITECH IMAGE TECHNOLOGIES, LLC**

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 DIGITECH IMAGE TECHNOLOGIES,
14 LLC,

15 Plaintiff,

16 v.

17 MOTOROLA MOBILITY, INC.,
18 MOTOROLA MOBILITY HOLDINGS,
19 LLC and MOTOROLA, INC.

20 Defendants.

CLEAR US DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
2012 DEC -7 PM 12:09
FILED

CASE NO. SACV12-02123 CJC (JPRx)

ORIGINAL COMPLAINT FOR
INFRINGEMENT OF U.S. PATENT
NO. 6,128,415

DEMAND FOR JURY TRIAL

Complaint Filed: December 7, 2012

21 **ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

22 This is an action for patent infringement in which DIGITECH IMAGE
23 TECHNOLOGIES, LLC submits this Original Complaint against the Defendants
24 named herein, namely MOTOROLA MOBILITY, INC., MOTOROLA MOBILITY
25 HOLDINGS, LLC and MOTOROLA, INC. (collectively "Defendants" or
26 "MOTOROLA"), as follows:
27
28

1 information and belief, MOTOROLA has interactive websites which are used in
2 and/or accessible in this forum. Further, on information and belief, MOTOROLA
3 regularly conducts and/or solicits business, engages in other persistent courses of
4 conduct, and/or derives substantial revenue from goods and services provided to
5 persons and/or entities in California.
6

7
8 5. Venue is proper in this district under 28 U.S.C. §§ 1391(b), 1391(c) and
9 1400(b). Without limitation, on information and belief, MOTOROLA is subject to
10 personal jurisdiction in this district. On information and belief, MOTOROLA is
11 subject to this Court's specific and/or general personal jurisdiction, pursuant to due
12 process and/or the California Long Arm Statute, due at least to their substantial
13 business in this district, including related to the infringements alleged herein. Further,
14 on information and belief, MOTOROLA is, within this forum, engaged in at least the
15 selling of the accused products listed herein. In addition, MOTOROLA induces
16 infringement of the patent-in-suit by sellers and/or infringing users located in this
17 forum. Further, on information and belief, MOTOROLA has interactive websites
18 which are used in and/or accessible in this forum. Further, on information and belief,
19 MOTOROLA regularly conducts and/or solicits business, engages in other persistent
20 courses of conduct, and/or derives substantial revenue from goods and services
21 provided to persons and/or entities in California.
22
23
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25
26

27 **COUNT I**
28

INFRINGEMENT OF U.S. PATENT NO. 6,128,415

6. United States Patent No. 6,128,415 ("the '415 patent"), entitled "DEVICE PROFILES FOR USE IN A DIGITAL IMAGE PROCESSING SYSTEM," issued on October 3, 2000.

7. DIGITECH is the present assignee of the entire right, title and interest in and to the '415 patent, including all rights to sue for past and present infringement. Accordingly, DIGITECH has standing to bring this lawsuit for infringement of the '415 patent.

8. The various claims of the '415 patent cover, *inter alia*, a device profile for describing properties of a device in a digital image reproduction system to capture, transform or render an image, said device profile comprising: first data for describing a device dependent transformation of color information content of the image to a device independent color space; and second data for describing a device dependent transformation of spatial information content of the image in said device independent color space.

9. On information and belief, MOTOROLA has been and now is infringing the '415 patent by actions comprising making, using, importing, selling and/or offering to sell products comprising a device profile for describing properties of a device in a digital image reproduction system to capture, transform or render an image, said device profile comprising: first data for describing a device dependent

1 transformation of color information content of the image to a device independent
2 color space; and second data for describing a device dependent transformation of
3 spatial information content of the image in said device independent color space.
4

5 10. Moreover, on information and belief, MOTOROLA has been and now is
6 indirectly infringing by way of intentionally inducing infringement of the '415 patent
7 in this judicial district, and elsewhere in the United States, including by aiding or
8 abetting re-sellers to sell and/or offer for sale infringing products and/or customers
9 and/or users to use infringing products. Upon information and belief, such induced
10 infringement has occurred at least since this MOTOROLA became aware of the '415
11 patent, at least through becoming aware of this Complaint.
12
13
14

15 11. Upon present information and belief, MOTOROLA's infringing products
16 comprise at least the following accused products: Droid Razr M, Droid Razr HD, Razr
17 Maxx HD, Photon Q and Atrix HD.
18

19 12. MOTOROLA is thus liable for infringement of the '415 patent pursuant
20 to 35 U.S.C. § 271.
21

22 13. As a result of MOTOROLA's infringing conduct, MOTOROLA has
23 damaged DIGITECH. MOTOROLA is liable to DIGITECH in an amount that
24 adequately compensates DIGITECH for their infringement, which, by law, can be no
25 less than a reasonable royalty.
26
27
28

1 14. DIGITECH will take discovery relative to MOTOROLA's pre-suit
2 knowledge of the '415 patent at the appropriate time. Upon information and belief,
3 MOTOROLA's infringement of the '415 patent since receiving notice of the patent, at
4 a minimum by virtue of this lawsuit, would necessarily be willful and objectively
5 reckless at least due to the fact that MOTOROLA's infringement is clear and there is
6 no known good faith basis to assert invalidity.
7

8
9 **PRAYER FOR RELIEF**

10 WHEREFORE, DIGITECH respectfully requests that this Court enter:
11

12 1. A judgment in favor of DIGITECH that MOTOROLA has infringed,
13 directly and/or indirectly, the '415 patent;
14

15 2. A judgment that MOTOROLA's infringement is and/or has been willful
16 and objectively reckless;
17

18 3. A permanent injunction enjoining MOTOROLA, and its officers,
19 directors, employees, agents, affiliates and all others acting in active concert therewith
20 from infringing the '415 patent;
21

22 4. A judgment and order requiring MOTOROLA to pay DIGITECH its
23 damages, costs, expenses, and prejudgment and post-judgment interest for
24 MOTOROLA's infringement of the '415 patent as provided under 28 U.S.C. § 284;
25

26 5. An award to DIGITECH for enhanced damages as provided under 35
27 U.S.C. § 284;
28

1 6. A judgment and order finding that this is an exceptional case within the
2 meaning of 35 U.S.C. § 285 and awarding to DIGITECH its reasonable attorneys'
3 fees;
4

5 7. Any and all other relief to which DIGITECH may show itself to be
6 entitled.
7

8 **DEMAND FOR JURY TRIAL**

9 Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial
10 by jury of any issues so triable by right.
11

12
13 Dated: December 7, 2012

Respectfully submitted,

14 COLLINS, EDMONDS,
15 POGORZELSKI, SCHLATHER &
16 TOWER, PLLC

17 

18 John J. Edmonds – LEAD COUNSEL
19 State Bar No. 274200

20 Attorney for Plaintiff
21 DIGITECH IMAGE
22 TECHNOLOGIES, LLC
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UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

| | | | |
|--|--|---|--|
| I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) DIGITECH IMAGE TECHNOLOGIES, LLC | | DEFENDANTS MOTOROLA MOBILITY, INC., MOTOROLA MOBILITY HOLDINGS, LLC and MOTOROLA, INC. | |
| (b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) JOHN J. EDMONDS, COLLINS, EDMONDS, POGORZELSKI, 1851 EAST FIRST STREET, SUITE 900, SANTA ANA, CA 92705 | | Attorneys (If Known) | |

| | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|--|--|----------------------------|------------|------------|----------------------------|----------------------------|---|----------------------------|---|----------------------------|----------------------------|---|----------------------------|---|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III) | III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:50%; border: none;"> Citizen of This State Citizen of Another State Citizen or Subject of a Foreign Country </td> <td style="width:50%; border: none; text-align: right;"> <table style="width:100%; border: none;"> <tr> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> <td style="border: none;"></td> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="border: none;">Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none;">Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table> </td> </tr> </table> | Citizen of This State Citizen of Another State Citizen or Subject of a Foreign Country | <table style="width:100%; border: none;"> <tr> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> <td style="border: none;"></td> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="border: none;">Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none;">Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table> | PTF | DEF | | PTF | DEF | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |
| Citizen of This State Citizen of Another State Citizen or Subject of a Foreign Country | <table style="width:100%; border: none;"> <tr> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> <td style="border: none;"></td> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="border: none;">Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none;">Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table> | PTF | DEF | | PTF | DEF | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 | | |
| PTF | DEF | | PTF | DEF | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 | | | | | | | | | | | | | | | | | | | |

IV. ORIGIN (Place an X in one box only.)
☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify):
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)
 CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No
 MONEY DEMANDED IN COMPLAINT: \$

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Patent Infringement 35 U.S.C. § 271

VII. NATURE OF SUIT (Place an X in one box only.)

| | | | | | |
|---|--|--|---|---|--|
| OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rules/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes | CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions | TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage-Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights | PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other | LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395R) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609 |
|---|--|--|---|---|--|

FOR OFFICE USE ONLY: Case Number: SACV12-02123 CJC (JPRx)

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☐ No ☒ Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☐ No ☒ Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events, or
☒ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☒ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☒ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

| | |
|---------------------------|---|
| County in this District:* | California County outside of this District, State, if other than California, or Foreign Country |
| Plaintiff (Orange County) | |

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

| | |
|---------------------------|---|
| County in this District:* | California County outside of this District, State, if other than California, or Foreign Country |
| | MOTOROLA MOBILITY, INC. (DELAWARE) MOTOROLA MOBILITY HOLDINGS, LLC (DELAWARE) MOTOROLA, INC. (DELAWARE) |

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

| | |
|---------------------------|---|
| County in this District:* | California County outside of this District, State, if other than California, or Foreign Country |
| | |

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date 12/7/12

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

| Nature of Suit Code | Abbreviation | Substantive Statement of Cause of Action |
|---------------------|--------------|--|
| 861 | HIA | All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b)) |
| 862 | BL | All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969 (30 U.S.C. 923) |
| 863 | DIWC | All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g)) |
| 863 | DIWW | All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g)) |
| 864 | SSID | All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended. |
| 865 | RSI | All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended (42 U.S.C. (g)) |

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case?

1. DIGITECH IMAGE TECHNOLOGIES, LLC v. AGFAPHOTO GMBH et al. (Civil Action No. SACV 12-01153-MLG)
2. DIGITECH IMAGE TECHNOLOGIES, LLC v. ELECTRONICS FOR IMAGING, INC. (Civil Action No. SACV 12-01324-JVS-RNB)
3. DIGITECH IMAGE TECHNOLOGIES, LLC v. KONICA MINOLTA HOLDINGS, INC., ET AL (Civil Action No. SACV12-01694-DOC-MLG)
4. DIGITECH IMAGE TECHNOLOGIES, LLC v. XEROX CORPORATION (Civil Action No. SACV12-01693-CJC-RNB)
5. DIGITECH IMAGE TECHNOLOGIES, LLC v. BEST BUY CO., INC.; BEST BUY STORES, LP; BESTBUY.COM, LLC (Civil Action No. SACV12-01669-JVS-MLG)
6. DIGITECH IMAGE TECHNOLOGIES, LLC v. BUY.COM INC. (Civil Action No. SACV12-01668-CJC-MLG)
7. DIGITECH IMAGE TECHNOLOGIES, LLC v. CANON INC.; CANON U.S.A., INC. (Civil Action No. SACV12-01670-CJC-MLG)
8. DIGITECH IMAGE TECHNOLOGIES, LLC v. CASIO COMPUTER CO., LTD.; CASIO AMERICA, INC. (Civil Action No. SACV12-01697-CJC-JPR)
9. DIGITECH IMAGE TECHNOLOGIES, LLC v. CDW LLC (Civil Action No. SACV12-01695-JST-AN)
10. DIGITECH IMAGE TECHNOLOGIES, LLC v. FUJIFILM CORPORATION; FUJIFILM HOLDINGS CORPORATION; FUJIFILM HOLDINGS AMERICA CORPORATION (Civil Action No. SACV12-01679-AG-JPR)
11. DIGITECH IMAGE TECHNOLOGIES, LLC v. GENERAL IMAGING COMPANY (Civil Action No. SACV12-01680-AG-RNB)
12. DIGITECH IMAGE TECHNOLOGIES, LLC v. VICTOR HASSELBLAD AB; HASSELBLAD USA INC. (Civil Action No. SACV12-01696-AG-RNB)
13. DIGITECH IMAGE TECHNOLOGIES, LLC v. LEICA CAMERA AG; LEICA CAMERA INC. (Civil Action No. SACV12-01677-AG-RNB)

- 14.DIGITECH IMAGE TECHNOLOGIES, LLC v. MAMIYA DIGITAL IMAGING CO., LTD.; LEAF IMAGING LTD. D/B/A MAMIYALEAF; MAMIYA AMERICA CORPORATION (Civil Action No. SACV12-01675-JVS-JPR)
- 15.DIGITECH IMAGE TECHNOLOGIES, LLC v. MICRO ELECTRONICS, INC. D/B/A MICRO CENTER (Civil Action No. SACV12-01686-JST-AN)
- 16.DIGITECH IMAGE TECHNOLOGIES, LLC v. NEWEGG, INC.; NEWEGG.COM, INC. (Civil Action No. SACV12-01688-JVS-MLG)
- 17.DIGITECH IMAGE TECHNOLOGIES, LLC v. NIKON CORPORATION; NIKON INC.; NIKON AMERICAS, INC. (Civil Action No. SACV12-01685-CJC-JPR)
- 18.DIGITECH IMAGE TECHNOLOGIES, LLC v. OLYMPUS CORPORATION; OLYMPUS IMAGING AMERICA INC. (Civil Action No. SACV12-01676-JVS-RNB)
- 19.DIGITECH IMAGE TECHNOLOGIES, LLC v. OVERSTOCK.COM, INC. (Civil Action No. SACV12-01687-AG-RNB)
- 20.DIGITECH IMAGE TECHNOLOGIES, LLC v. PANASONIC CORPORATION; PANASONIC CORPORATION OF NORTH AMERICA (Civil Action No. SACV12- 01667-AG-JPR)
- 21.DIGITECH IMAGE TECHNOLOGIES, LLC v. PENTAX RICOH IMAGING CO., LTD.; PENTAX RICOH IMAGING AMERICAS CORPORATION; RICOH COMPANY, LTD.; RICOH AMERICAS CORPORATION (Civil Action No. SACV12-01689-AG-RNB)
- 22.DIGITECH IMAGE TECHNOLOGIES, LLC v. SAKAR INTERNATIONAL, INC. D/B/A VIVITAR (Civil Action No. SACV12-01673-JVS-AN)
- 23.DIGITECH IMAGE TECHNOLOGIES, LLC v. SIGMA CORPORATION; SIGMA CORPORATION OF AMERICA (Civil Action No. SACV12-01681-JST-AN)
- 24.DIGITECH IMAGE TECHNOLOGIES, LLC v. SONY CORPORATION; SONY CORPORATION OF AMERICA; SONY ELECTRONICS INC. (Civil Action No. SACV12-01678-AG-AN)
- 25.DIGITECH IMAGE TECHNOLOGIES, LLC v. TARGET CORPORATION (Civil Action No. SACV12-01683-JST-RNB)
- 26.DIGITECH IMAGE TECHNOLOGIES, LLC v. ACER AMERICA CORPORATION, and ACER INC. (Civil Action No. TBD)
- 27.DIGITECH IMAGE TECHNOLOGIES, LLC v. APPLE INC. (Civil Action No. TBD)

- 28.DIGITECH IMAGE TECHNOLOGIES, LLC v. ASUS COMPUTER INTERNATIONAL and ASUSTEK COMPUTER INC. (Civil Action No. TBD)
- 29.DIGITECH IMAGE TECHNOLOGIES, LLC v. HTC AMERICA, INC., HTC CORP. a/k/a HIGH TECH COMPUTER CORP. and HTC (B.V.I) CORP. (Civil Action No. TBD)
- 30.DIGITECH IMAGE TECHNOLOGIES, LLC v. LG ELECTRONICS USA, INC., LG ELECTRONICS, INC. and LG ELECTRONICS MOBILECOMM U.S.A., INC. (Civil Action No. TBD)
- 31.DIGITECH IMAGE TECHNOLOGIES, LLC v. TOSHIBA CORPORATION; TOSHIBA AMERICA, INC.; TOSHIBA AMERICA BUSINESS SOLUTIONS, INC., TOSHIBA AMERICA INFORMATION SYSTEMS, INC. (Civil Action No. TBD)

Name & Address:
 JOHN J. EDMONDS (STATE BAR NO. 274200)
 COLLINS, EDMONDS, POGORZELSKI,
 SCHLATHER & TOWER, PLLC
 1851 EAST FIRST STREET, SUITE 900
 SANTA ANA, CA 92705

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

DIGITECH IMAGE TECHNOLOGIES, LLC

PLAINTIFF(S)

v.

MOTOROLA MOBILITY, INC., MOTOROLA
 MOBILITY HOLDINGS, LLC and
 MOTOROLA, INC.

DEFENDANT(S)

CASE NUMBER

SACV12-02123 CJC (JPRx)

SUMMONS

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, John J. Edmonds, whose address is 1851 East First Street, Suite 900, Santa Ana, California 92705. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: DEC - 7

By: W. Balme

Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

Name & Address:

JOHN J. EDMONDS (STATE BAR NO. 274200)
 COLLINS, EDMONDS, POGORZELSKI,
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DIGITECH IMAGE TECHNOLOGIES, LLC

PLAINTIFF(S)

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MOTOROLA MOBILITY, INC., MOTOROLA
 MOBILITY HOLDINGS, LLC and
 MOTOROLA, INC.

DEFENDANT(S).

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SACV12-02123 CJC (JPRx)

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Clerk, U.S. District Court

Dated: DEC -7By: N. Boehm
Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3).]

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Cormac J. Carney and the assigned discovery Magistrate Judge is Jean P. Rosenbluth.

The case number on all documents filed with the Court should read as follows:

SACV12- 2123 CJC (JPRx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

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NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☐ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.