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20 *Pro hac vice application to be filed*

21 Attorneys for Plaintiff  
22 D3 LED, LLC

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

25 D3 LED, LLC,

26 Plaintiff,

27 v.

28 REVOLUTION DISPLAY, LLC;  
FULL THROTTLE FILMS, LLC;  
VIDEO EQUIPMENT RENTALS,  
LLC; AND DOES 1 through 10,  
inclusive,

Defendants.

) Case No.:

) Judge:

) **COMPLAINT FOR PATENT  
INFRINGEMENT**

) **DEMAND FOR JURY TRIAL**

1 Plaintiff D3 LED, LLC (“D3 LED”) hereby brings this Complaint for Patent  
2 Infringement against Revolution Display, LLC; Full Throttle Films, LLC; Video  
3 Equipment Rentals, LLC; and Does 1 through 10, inclusive, (collectively  
4 “Defendants”) for infringement of U.S. Patent No. 7,948,450 (“‘450 Patent”), and  
5 alleges as follows:

6 **NATURE OF THE ACTION**

7 1. D3 LED is a global innovator and marketer of LED digital displays for  
8 commercial and business use. D3 LED’s products include the “ripple” and wrap-  
9 around display at ABC Studios in Times Square, the custom interior display for  
10 ABC’s Good Morning America Show, and the custom interior LED displays on the  
11 set of NBC’s TODAY Show.

12 2. D3 LED’s success is due in significant part to its investment in  
13 research and development. Among its most important and valuable innovations are  
14 methods and apparatus disclosed in the ‘450 Patent that allow display modules  
15 making up a display panel to communicate information about themselves to  
16 adjacent modules through adjacent receivers or transceivers controlled by a main  
17 controller, enabling faster, simpler and more effective set up, operation, and repair  
18 of LED display panels.

19 3. Defendants are direct competitors of D3 LED and are currently  
20 marketing a LED digital display module controller they call the “M8 Distribution  
21 Platform” (“Accused Device”). The advertising for the Accused Device asserts that  
22 it enables “automatic mapping” of an LED display panel using “intelligent sensors  
23 and software.” D3 LED is informed and believes and thereon alleges that the  
24 Accused Device accomplishes this functionality by utilizing adjacent receivers or  
25 transceivers mounted on individual display modules making up a display panel.  
26 Based on these facts, D3 LED believes that the Accused Device infringes the ‘450  
27 Patent.

1 4. D3 LED's attorneys have sought Defendants' response to D3 LED's  
2 accusation of patent infringement and Defendants' disclosure of technical  
3 information for the Accused Device subject to a confidentiality agreement.  
4 Although Defendants' attorney stated that he could "report" that there was no  
5 infringement, Defendants would not provide evidence in the form of schematic  
6 drawings or other documentation to support this "report" and would not agree to  
7 enter into a confidentiality agreement, leaving D3 LED with no reasonable  
8 alternative other than filing this action.

9 **THE PARTIES**

10 5. D3 LED is a Delaware limited liability company with its principal  
11 place of business at 11370 Sunrise Park Drive, Rancho Cordova, California 95742.

12 6. On information and belief, Revolution Display, LLC, is a Delaware  
13 limited liability company with its principal place of business at 757 West California  
14 Ave., Glendale, California 91203.

15 7. On information and belief, Full Throttle Films, LLC, is a Delaware  
16 limited liability company with its principal place of business at 912 Ruberta Ave.,  
17 Glendale, California 91201.

18 8. On information and belief, Video Equipment Rentals, LLC, is a  
19 Delaware limited liability company with its principal place of business at 757 West  
20 California Ave., Glendale, California 91203.

21 9. D3 LED is unaware of the true names of the Defendants listed as Does  
22 1-10, inclusive, and will move to amend its Complaint upon discovering such  
23 information.

24 **JURISDICTION AND VENUE**

25 10. This is an action for patent infringement arising under the patent laws  
26 of the United States, 35 U.S.C. § 1 et seq. so this Court has original jurisdiction  
27 under 28 U.S.C. § 1338(a).

1 11. Venue is proper in this District because Defendants reside here and  
2 because, as alleged herein, Defendants are responsible for acts of infringement  
3 occurring within this District.

4 **THE PATENT IN SUIT**

5 12. On May 24, 2011, The United States Patent and Trademark Office  
6 issued the '450 Patent titled Apparatus and Method for Allowing Display Modules  
7 to Communicate Information About themselves to Other Display Modules in the  
8 Same Display Panel. A true and correct copy of the '450 Patent is attached as  
9 **Exhibit 1** and incorporated here by reference.

10 **CLAIM FOR PATENT INFRINGEMENT**

11 13. D3 LED incorporates the allegations in the Paragraphs above.

12 14. D3 LED is the owner of the '450 Patent with full rights to pursue  
13 recoveries for infringement of the '450 Patent, including full rights to recover past  
14 and future damages.

15 15. Each Claim of the '450 Patent is valid and enforceable.

16 16. The following text appears under the heading "Revolution Display M8  
17 Platform" on the webpage located at [https://www.ver.com/product/revolution-  
19 display-m8-platform/](https://www.ver.com/product/revolution-<br/>18 display-m8-platform/):

20 **AUTO MAPPING**

21 When coupled with compatible panels, the M8 system will auto-map  
22 the display thanks to intelligent sensors and software. Speed through  
23 on-site setup and watch the system automatically integrate components  
24 as they are connected or replaced.

25 17. The web page states that "VER is a trademark of Full Throttle Films."

26 18. The VER name has been associated with Video Equipment Rentals,  
27 LLC.

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1 19. The web page also links to a brochure titled “M8 PLATFORM—  
2 Realtime 4K LED Video Distribution” (“Brochure”). A true and correct copy of  
3 the Brochure is attached as **Exhibit 2** and incorporated here by reference.

4 20. The Brochure includes the following on page 2:



6 **AUTO MAPPING**

7 When coupled with compatible panels, the M8 system will auto-map the display thanks to intelligent sensors  
8 and software. Speed through on-site setup and watch the system automatically integrate components as they  
9 are connected or replaced.

10 21. D3 LED’s attorneys have requested that Defendants’ attorney provide  
11 documentation subject to a confidentiality agreement supporting Defendants’  
12 assertion that the Accused Product does not infringe the ‘450 Patent, but Defendants  
13 have refused to do so. Defendants attorney did not agree to enter into a  
14 confidentiality agreement or provide documentation.

15 22. On information and belief, the Accused Device practices each aspect  
16 of the apparatus and method disclosed in the ‘450 Patent.

17 23. D3 LED has been damaged by Defendants’ infringement of the ‘450  
18 Patent and will suffer additional irreparable damage unless Defendants are enjoined  
19 from continuing to infringe.

20 24. On information and belief, Defendants’ infringement has been willful  
21 and continues to be, at least since receipt of a letter from D3 LED’s counsel on July  
22 12, 2017, notifying them of the ‘451 Patent and asserting that the Accused Device  
23 infringed its claims.

24 **PRAYER**

25 WHEREFORE Plaintiff D3 LED, LLC prays for judgment in its favor and  
26 against Defendants as follows:

27 1. For compensatory damages in an amount not yet ascertained but in  
28 excess of the jurisdictional minimum of this Court.

2. For disgorgement of Defendants’ revenues and/or profits.

1           3.     For an award of treble damages.

2           4.     For an order preliminarily and permanently enjoining Defendants from  
3 infringing the '450 Patent.

4           5.     For an award of reasonable attorneys' fees and costs.

5           6.     For prejudgment interest.

6           7.     For such other relief as the Court deems just.

7 DATED: April 2, 2018

**ENENSTEIN PHAM & GLASS**

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9  
10 By:   
11       NED M. GELHAAR  
12       Attorneys for Plaintiff

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands trial by jury of this case as provided by Rule 38(a) of the Federal Rules of Civil Procedure for all claims for which a right to trial by jury exists.

DATED: April 2, 2018

**ENENSTEIN PHAM & GLASS**

By:   
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NED M. GELHAAR  
Attorneys for Plaintiff

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