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

KT IMAGING USA, LLC, Plaintiff, v. REOLINK DIGITAL TECHNOLOGY CO., LTD., Defendant.	Civil Action No.: 6:22-cv-00876 **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff KT Imaging USA, LLC ("KTI" or "Plaintiff"), by way of this Complaint against Reolink Digital Technology Co., Ltd. ("Reolink" or "Defendant"), alleges patent infringement by the Defendant as set forth herein.

RELATEDNESS TO OTHER CASES

1. This action is related to other actions considered by the District Court for the Western District of Texas, Waco Division. Specifically, KT Imaging asserted both U.S. Patent No. 8,004,602 and U.S. Patent No. 8,314,481 ("Patents-in-Suit") in other actions that it had previously filed in in the Waco Division, and the Waco Division Court had construed claims of both of those Patents-in-Suit. The Waco Division Court had also considered numerous motions, including a motion relating to an expert report, and resolved disputes between parties relating to the technology at issue in these patents. The following is a list of KT Imaging actions involving both Patents-in-Suit considered by the Waco Division Court:

- *KT Imaging USA, LLC v. Acer Amer. Corp. et al.* (6:20-cv-299) (Claim Construction Order, Dkt. 43, Albright, J.);

- *KT Imaging USA, LLC v. AsusTek Computer Inc.* (6:20-cv-300) (Claim Construction Order, Dkt. 40, Albright, J.);
- *KT Imaging USA, LLC v. Microsoft Corp.* (6:21-cv-1000); and
- *KT Imaging USA, LLC v. Apple Inc.* (6:21-cv-1002).

The following is a list of KT Imaging actions involving the '602 Patent:

- *KT Imaging USA, LLC v. Google LLC* (6:21-cv-1003); and
- *KT Imaging USA, LLC v. Dell Tech. Inc. et al.* (6:21-cv-1004).

PARTIES

2. Plaintiff KT Imaging USA, LLC is a limited liability company organized and existing under the laws of the State of Texas, having its principal place of business at 106 E 6th Street, Suite 900, Austin, TX 78701.

3. On information and belief, Defendant Reolink Digital Technology Co., Ltd. is a corporation organized in China having its principal place of business at A218, ShiWaiTaoYuan ChuanyiYuan, 1st of PingShan Road, Xili, NanShan Shenzhen China.

JURISDICTION AND VENUE

4. This is an action under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.*, for infringement by Reolink of claims of U.S. Patent No. 8,004,602 and U.S. Patent No. 8,314,481 (collectively "the Patents-in-Suit").

5. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. Reolink is subject to the personal jurisdiction of this Court because, *inter alia*, on information and belief, (i) Reolink has committed and continues to commit acts of patent infringement in the State of Texas, including by making, using, offering to sell, selling, and/or importing the accused products into Texas; (ii) Reolink purposefully supplies and directs the accused products for storage, warehousing, sales by distributors and resellers in the State of

Texas; and (iii) Reolink delivers its products into the stream of commerce with the expectation that they will be purchased by consumers in the State of Texas; Reolink uses its trademark on the accused products sold in the State of Texas.

7. In addition, or in the alternative, this Court has personal jurisdiction over Reolink pursuant to Fed. R. Civ. P. 4(k)(2).

8. Venue is proper in this district under 28 U.S.C. 1391(c) because, *inter alia*, Reolink is a foreign corporation.

BACKGROUND

9. On August 23, 2011, the United States Patent and Trademark Office duly and lawfully issued U.S. Patent No. 8,004,602 ("the '602 Patent"), entitled "Image Sensor Structure and Integrated Lens Module Thereof."

10. On November 20, 2012, the United States Patent and Trademark Office duly and lawfully issued U.S. Patent No. 8,314,481 ("the '481 Patent"), entitled "Substrate Structure for an Image Sensor Package and Method for Manufacturing the Same."

11. KTI is the assignee and owner of the right, title, and interest in and to the Patents-in-Suit, including the right to assert all causes of action arising under said patents and the right to any remedies for infringing them.

12. Reolink has infringed and continues to infringe the Patents-in-Suit by making, using, selling, or offering for sale in the United States, or importing into the United States security cameras with image sensors.

COUNT I: INFRINGEMENT OF THE '602 PATENT BY REOLINK

13. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

14. On information and belief, Reolink has infringed the '602 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, offering to sell, selling in

the United States, or importing into the United States the Accused Products, including Keen Ranger PT, Reolink Go PT Plus, Reolink Lumus, Reolink Duo, Reolink Duo 4G, Reolink Duo PoE, Reolink Duo WiFi, Reolink TrackMix Wifi, Reolink TrackMix PoE, Argus 3 Pro, Argus PT (5/2.4GHz), Argus 3, Argus PT 2K, Argus 2E, Argus Eco, Reolink Go Pt Plus, Reolink Go Plus, Reolink Go, RLC-520A, RLC-1212A, RLC-811A, RLC-822A, RLC-842A, RLC-823A, RLC-820A, RLC-824A PoE cams, RLC-812A PoE cams, RLC-810A PoE, B800 PoE cams, B400, E1 Outdoor, RLC-510WA, RLC-510A, RLC-410W, RLC-511WA, RLC-542WA, RLC-523WA, E1 Zoom, E1 Pro, E1, and all other products with substantially similar imaging sensors.

15. For example, on information and belief, Reolink has infringed and continues to infringe at least claim 1 of the ’602 Patent by including an image sensor structure with an integrated lens module in the Accused Products including the Reolink Argus 2E Camera. *See* Ex. 1 (cross-sectional image of the Reolink Argus 2E Camera image sensor). The image sensor structure in the Accused Products comprises a chip having a plurality of light-sensing elements arranged on a light sensing area of a first surface of the chip, a plurality of first conducting pads arranged around the light-sensing area and electrically connected to the light-sensing elements, and at least one conducting channel passing through the chip and electrically connected to the first conducting pads at one end as well as extending along with a second surface of the chip. *See* Exs. 1-3 (images of the Reolink Argus 2E Camera image sensor with the internal components exposed and cross-sectional image of the Reolink Argus 2E Camera image sensor). The image sensor structure in the Accused Products comprises a lens module comprising a holder having a through hole and a contact surface on a bottom of the holder, wherein the contact surface is combined with the first surface, and at least one lens completely embedded inside the through hole and integrated with the holder. *See* Exs. 1 and 4 (cross-sectional images of the Reolink

Argus 2E Camera image sensor).

16. On information and belief, Reolink has committed the foregoing infringing activities without a license.

COUNT II: INFRINGEMENT OF THE '481 PATENT REOLINK

17. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

18. On information and belief, Reolink has infringed the '481 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, offering to sell, selling in the United States, or importing into the United States the Accused Products and all other products with substantially similar imaging sensors.

19. For example, on information and belief, Reolink has infringed and continues to infringe at least claim 1 of the '481 Patent by including a substrate structure for an image sensor package in the Accused Products including the Reolink Argus 3 Camera. *See* Ex. 5 (cross-sectional image of the Reolink Argus 3 Camera image sensor). The substrate structure in the Accused Products comprises a bottom base having an upper surface formed with a plurality of first electrodes, and a lower surface formed with a plurality of second electrodes, wherein an insulation layer is coated between first electrodes and in direct surface contact with the upper surface of the bottom base. *See* Exs. 5-6 (images of Reolink Argus 3 Camera with the internal components exposed and cross-sectional image of the Reolink Argus 3 Camera image sensor). The substrate structure in the Accused Products comprises a frame layer arranged on and in direct surface contact with the first electrodes and the insulation layer to form a cavity together with the bottom base, wherein the insulation layer is interposed between the bottom base and the frame layer. *See* Exs. 5-6 (images of Reolink Argus 3 Camera with the internal components exposed and cross-sectional image of the Reolink Argus 3 Camera image sensor).

20. On information and belief, Reolink has committed the foregoing infringing activities

without a license.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff KTI prays for the judgment in its favor against Reolink, and specifically, for the following relief:

A. Entry of judgement in favor of KTI against Reolink on all counts;

B. Entry of judgement that Reolink has infringed the Patents-in-Suit;

C. An order permanently enjoining Reolink from infringing the Patents-in-Suit;

D. Award of compensatory damages adequate to compensate KTI for Reolink's infringement of the Patents-in-Suit, in no event less than a reasonable royalty as provided by 35 U.S.C. § 284;

E. KTI's costs;

F. Pre-judgement and post-judgement interest on KTI's award; and

G. All such other and further relief as the Court deems just or equitable.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Fed. R. Civ. P., Plaintiff KTI hereby demands trial by jury in this action of all claims so triable.

Dated: August 22, 2022

/s/ Dmitry Kheyfits

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