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(See Signature Page for Names and Addresses of Additional Counsel for Plaintiff)

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CASCADES PROJECTION LLC, Plaintiff, vs. BARCO, INC. and BARCO FEDERAL SYSTEMS LLC, Defendants.	Case No. 2:15-CV-00271 **COMPLAINT FOR PATENT INFRINGEMENT** DEMAND FOR JURY TRIAL

Plaintiff Cascades Projection LLC ("Cascades"), by its undersigned attorney, for its complaint against defendants Barco, Inc. and Barco Federal Systems LLC ("Barco"), 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 Barco, Inc. is a corporation organized and existing under the laws of Delaware, with its principal place of business located in Duluth, Georgia.

Barco transacts substantial business, either directly or through its agents, on an ongoing basis in this judicial district and elsewhere in the United States.

4. Defendant Barco Federal Systems LLC is a limited liability company organized and existing under the laws of Delaware, with its principal place of business located in Duluth, Georgia. Barco transacts substantial business, either directly or through its agents, on an ongoing basis in this judicial district and elsewhere in the United States.

JURISDICTION AND VENUE

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

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

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

BACKGROUND

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

9. Among his innovations, Dolgoff developed several techniques to increase the efficiency of light use in digital projection systems. Early projection systems used light inefficiently, causing significant amounts of light from a projector's lamp to be wasted. The result was a dim image, difficult to see without turning off any other light sources in the room. Furthermore, early projection systems did not use light uniformly across the image—causing the image to be dim around its outer edge. Nor did they attempt to evenly disperse the color of the light emanating from its light source.

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

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

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

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

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

14. Barco has infringed and continues to infringe one or more claims of the '347 patent by its manufacture, use, sale, importation, and/or offer for sale of certain digital projector systems, including but not limited to Barco's DP4K-32B and DP2K-12C projectors. Barco is liable for its infringement of the '347 patent pursuant to 35 U.S.C. § 271.

PRAYER FOR RELIEF

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

a. Declaring that Barco has infringed U.S. Patent No. 7,688,347;

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

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

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

Dated: January 13, 2015

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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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