UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Princeton Digital Image Corporation Plaintiff, v. Ubisoft Entertainment SA, Defendant.	Case No. JURY TRIAL DEMANDED

COMPLAINT

Princeton Digital Image Corporation (hereinafter referred to as "Plaintiff" or "PDIC") demands a jury trial and complains against the Defendant as follows:

THE PARTIES

1. PDIC is a corporation organized and existing under the laws of the State of Texas.

2. Upon information and belief, defendant Ubisoft Entertainment SA is a French corporation with a principal place of business at 28 rue Armand Carrel, Montreuil, 93100, France (Ubisoft).

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States of America, Title 35 of the United States Code. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and 1338(a).

4. Upon information and belief, Ubisoft is doing business and committing infringements in this judicial district, and is subject to personal jurisdiction in this judicial district.

5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

THE PATENT

6. Plaintiff PDIC repeats and incorporates herein the entirety of the allegations contained in paragraphs 1 through 5 above.

7. On April 30, 1996, U.S. Patent No. 5,513,129 (hereinafter referred to as "the '129 patent") was duly and legally issued for an invention entitled "METHOD AND SYSTEM FOR CONTROLLING COMPUTER-GENERATED VIRTUAL ENVIRONMENT IN RESPONSE TO AUDIO SIGNALS." By assignment, dated December 14, 2011, PDIC became the owner of all right, title and interest in the '129 patent, including the right to receive royalties for past infringements thereof. The '129 patent relates generally to allowing the control of a virtual environment in response to a music signal. A copy of the '129 patent is attached hereto as Exhibit 1.

CLAIM FOR PATENT INFRINGEMENT
COUNT ONE

8. Plaintiff PDIC repeats and incorporates herein the entirety of the allegations contained in paragraphs 1 through 7 above.

9. Ubisoft is the developer, distributor and/or publisher of various games that allow the control of a virtual environment in response to a music signal, including at least games known commercially as *Just Dance, Just Dance2, Just Dance3, Just Dance 4 and Just Dance Summer Party.*

10. Ubisoft has infringed and continues to infringe one or more claims of the '129 patent directly under 35 USC 271(a) through its developing, making, using, offering for sale and/or selling of at least the foregoing mentioned games. Additionally, PDIC believes that

discovery may reveal Ubisoft infringing one or more claims of the '129 patent by developing, making, using, offering for sale, and/or selling one or more other games, such as, at least, the game known commercially as *Rocksmith.*

11. It is anticipated that discovery may reveal still other products developed, made, used, offered for sale and/or sold by Ubisoft that infringe one or more claims of the '129 patent, and that other activities of Ubisoft may contribute to or induce infringement of one or more claims of the '129 patent.

12. Plaintiff has been damaged by Ubisoft infringements of the '129 patent, and will be irreparably harmed unless such infringing activities are enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff PDIC prays for judgment against Ubisoft on all the counts and for the following relief:

A. A declaration that the Plaintiff is the owner of the '129 patent, and that the Plaintiff has the right to sue and to recover for infringement thereof;

B. A declaration that the '129 patent is valid and enforceable;

C. A declaration that the Ubisoft has infringed the '129 patent;

D. Preliminary and permanent injunctions against Ubisoft, it's officers, agents, servants, employees and attorneys, all parent and subsidiary corporations, their assigns and successors in interest, and those persons acting in active concert or participation with them, including distributors and customers, enjoining them from continuing acts of infringement of the '129 patent;

E. An accounting for damages under 35 U.S.C. §284, together with interest as provided by law;

F. An award of the Plaintiff's attorneys' fees and costs; and

G. Such other and further relief as this Court may deem proper, just and equitable.

DEMAND FOR JURY TRIAL

Plaintiff PDIC demands a trial by jury of all issues properly triable by jury in this action.

Respectfully submitted,

O'KELLY ERNST & BIELLI, LLC

Dated: February 27, 2013

/s/ Sean T. O'Kelly

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