

# Patent Infringement CASE STUDY

**Case:** Shuffle Master v. CARD

**Clients:** Kirkland & Ellis

**Year:** 2003

**Venue:** U.S. District Court – District of Nevada

Counsel representing Shuffle Master was on a tight deadline to file a Motion for Preliminary Injunction. Shuffle Master was claiming multiple patent infringements of its card shuffling device technology by the defendant, CARD.

## Challenges

The court would need to understand the complex workings of the infringing CARD device solely by review of the filing materials. Think Twice would need to clearly illustrate how the defendant's mechanism operates at high speed; then compare it to specific language in Shuffle Master's patents to demonstrate that they are essentially the same.

## Solutions

Think Twice proposed a multimedia CD tutorial to support the motion. We quickly isolated crucial frames from video to illustrate the specific operations of the defendant's infringing device. We then compiled and edited the raw video into segments available on-demand, illustrating over 25 individual claims. Think Twice expedited review of the edited video and still exhibits by client and counsel (in two states) via our secure extranet to ensure the timetable was met. The final presentation had a highly intuitive design and allowed the court to randomly access and replay video for review at its own pace.

## Outcome

Completed in only three days, the tutorial is a self-contained comparison of patent language, motion video, animation and still graphics. The Court granted Shuffle Master's Motion for Preliminary Injunction. With our tutorial and an injunction in hand, Shuffle Master is now well positioned for the next stage of this litigation.

### Services Provided

- Strategic planning
- Creative development
- Graphic design
- Tutorials
- Demonstrative exhibits
- Deposition and impeachment exhibits
- Video editing
- 2D animations
- Flash and interactive media
- Still graphics, slides and boards
- Multimedia presentation

