

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE EASTERN DISTRICT OF TEXAS**
3 **MARSHALL DIVISION**

4 RENESAS ELECTRONICS CORPORATION,
5 511 TECHNOLOGIES, INC.

6 Plaintiffs,

7 v.

8 VIZIO, INC.,

9 Defendant.

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

10 For its Complaint against Defendant Vizio, Inc. (“Defendant” or “Vizio”), Plaintiffs
11 Renesas Electronics Corporation (“Renesas”) and 511 Technologies Inc. (“511 Technologies”)
12 (collectively “Plaintiffs”) allege as follows:

1 offers for sale, sells, distributes and imports products into the United States for use in audio-video
2 home entertainment systems. Such products and services include digital televisions. Since 2007
3 Defendant has consistently been a market leader in overall shipments of high definition digital
4 televisions.

5
6 **Count 1:**

7 **Infringement of U.S. Patent No. 7,199,432**

8 6. Plaintiffs incorporate by this reference the allegations set out in paragraphs 1-5
9 above.

10 7. Plaintiffs, individually or jointly, own by assignment all the right, title and interest
11 in and to U.S. Patent No. 7,199,432 (“the ’432 patent”) entitled “Semiconductor Integrated
12 Circuit Device.” The ’432 patent issued on April 3, 2007, based on Application No. 10/926,142,
13 filed on August 26, 2004 by inventors Yasushi Koubuchi, Koichi Nagasawa, Masahiro Moniwa
14 and Youhei Yamada. A copy of the patent is attached as Exhibit A.

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16 8. Plaintiffs are informed and believe that: Defendant has infringed, either literally
17 and/or under the doctrine of equivalents, the ’432 patent by using, offering for sale, selling, and/or
18 importing products or components of products into the United States, and within the scope of one
19 or more claims of the ’432 patent, without license or authority. Such infringing products or
20 components of products include (without limitation) Defendant’s digital televisions and
21 semiconductor components thereof.

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23 9. Plaintiffs are informed and believe that: Defendant has induced and/or contributed
24 to and continues to induce and/or contribute to the infringement of the ’432 patent by using,
25 offering for sale, selling, and/or importing products or components of products that constitute a
26 material part of the invention(s) claimed in the ’432 patent, without license or authority, knowing
27 that such products or components of products are especially made or especially adapted for use in
28

1 practicing the invention(s) claimed in the '432 patent and not staple articles or commodities of
2 commerce suitable for substantial noninfringing uses. Such products or components of products
3 include (without limitation) those associated with Defendant's digital televisions and
4 semiconductor components thereof.

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6 10. Defendant's infringement, inducement and contributory infringement of the '432
7 patent is ongoing. Unless enjoined, Defendant will continue to infringe the '432 patent, and
8 Plaintiffs will suffer irreparable injury as a direct and proximate result of Defendant's conduct.

9 11. Plaintiffs have been damaged by Defendant's conduct, and until an injunction
10 issues, will continue to be damaged in an amount yet to be determined.

11 **Count 2:**

12 **Infringement of U.S. Patent No. 6,531,400**

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14 12. Plaintiffs incorporate by this reference the allegations set out in paragraphs 1-11
15 above.

16 13. Plaintiffs, jointly or individually own by assignment all the right, title and interest
17 in and to U.S. Patent No. 6,531,400 ("the '400 patent") entitled "Process for Manufacturing
18 Semiconductor Integrated Circuit Device." The '400 patent issued on March 11, 2003, based on
19 Application No. 10/222,848 filed on August 19, 2002 by inventors Naofumi Ohashi, Junji
20 Noguchi, Toshinori Imai, Hizuru Yamaguchi, Nobuo Owada, Kenji Hinode, Yoshio Homma, and
21 Seiichi Kondo. A copy of the '400 patent is attached as Exhibit B.

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23 14. Plaintiffs are informed and believes that: Defendant has infringed, either literally
24 and/or under the doctrine of equivalents, the '400 patent by using, offering for sale, selling, and/or
25 importing products or components of products into the United States, and within the scope of one
26 or more claims of the '400 patent, without license or authority. Such infringing products or
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1 components of products include (without limitation) Defendant's digital televisions and
2 semiconductor components thereof.

3 15. Plaintiffs are informed and believes that: Defendant has induced and/or
4 contributed to and continues to induce and/or contribute to the infringement of the '400 patent by
5 using, offering for sale, selling, and/or importing products or components of products that
6 constitute a material part of the invention(s) claimed in the '400 patent, without license or
7 authority, knowing that such products or components of products are especially made or
8 especially adapted for use in practicing the invention(s) claimed in the '400 patent and not staple
9 articles or commodities of commerce suitable for substantial noninfringing uses. Such products or
10 components of products include (without limitation) those associated with Defendant's digital
11 televisions or semiconductor components thereof.
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13 16. Defendant's infringement, inducement and contributory infringement of the '400
14 patent is ongoing. Unless enjoined, Defendant will continue to infringe the '400 patent, and
15 Plaintiffs will suffer irreparable injury as a direct and proximate result of Defendant's conduct.
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17 19. Plaintiffs have been damaged by Defendant's conduct, and until an injunction
18 issues, will continue to be damaged in an amount yet to be determined.
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20 **Requested Relief**

21 Plaintiffs request the entry of judgment that:

- 22 a. The '432 and '400 patents are valid and enforceable;
- 23 b. Defendant is liable for infringement of the '432 and '400 patents;
- 24 c. Defendant and all affiliates, subsidiaries, officers, directors, employees, agents,
25 representatives, licensees, successors, assigns, and all those acting in concert
26 with, or for or on behalf of, Defendant shall be enjoined from direct or indirect
27 infringement of the '432 and '400 patents;
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- 1 d. Defendant shall pay damages to Plaintiffs;
2 e. This action be determined to be an exceptional case and Plaintiffs be awarded its
3 attorney's fees, costs and expenses; and
4 f. Plaintiffs be awarded such further relief as the Court deems appropriate.
5

6 **Demand for Jury Trial**

7 Plaintiffs demand a trial by jury of all issues that are triable to a jury.

8
9 DATED: August 12, 2011

Respectfully submitted,

10 By: /s/ Kevin Kudlac
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