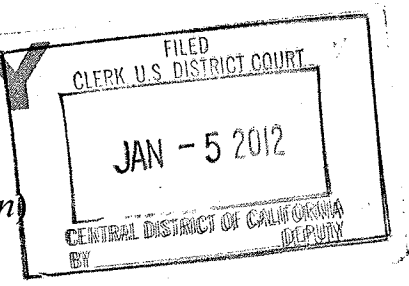


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27 Laboratory Co., Ltd.

28 **UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

SEMICONDUCTOR ENERGY  
LABORATORY CO., LTD.,

Plaintiff,

vs.

CHIMEI INNOLUX CORPORATION,  
CHI MEI OPTOELECTRONICS USA,  
INC., ACER AMERICA  
CORPORATION, VIEWSONIC  
CORPORATION, VIZIO, INC., and  
WESTINGHOUSE DIGITAL, LLC,

Defendants.

Case No.:

SACV12 0021JST(JPRx)

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

1 Plaintiff Semiconductor Energy Laboratory Co., Ltd. (“SEL”), by its  
2 attorneys, complains against defendants Chimei Innolux Corporation (“CMI”), Chi  
3 Mei Optoelectronics USA, Inc. (“CMO USA”), Acer America Corporation  
4 (“Acer”), ViewSonic Corporation (“ViewSonic”), VIZIO, Inc. (“VIZIO”), and  
5 Westinghouse Digital, LLC (“Westinghouse”) (collectively “Defendants”), as  
6 follows:

7 **PARTIES**

8 1. Plaintiff SEL is a corporation organized under the laws of Japan with  
9 its principal place of business at 398 Hase, Atsugi-shi, Kanagawa-Ken 243-0036  
10 Japan.

11 2. On information and belief, Defendant CMI is a corporation organized  
12 under the laws of Taiwan with its principal place of business at No. 160, Kesyue  
13 Rd., Jhunan Science Park, Miaoli County 350, Taiwan, R.O.C. On information  
14 and belief, CMI is a company established on March 18, 2010 as a result of the  
15 merger of Innolux Display Corporation with Chi Mei Optoelectronics Corporation  
16 (“CMO”) and TPO Displays Corporation. CMI manufactures electronic products  
17 in Taiwan and directly and/or indirectly imports, sells in and/or offers for sale its  
18 products in California and elsewhere in the United States. In addition, CMI  
19 provides these products to third parties through an established distribution channel  
20 knowing that these third parties will import, sell, offer for sale, and/or use these  
21 products in California and elsewhere in the United States using their nationwide  
22 contacts and distribution channels.

23 3. Defendant CMO USA is organized under the laws of Delaware and,  
24 on information and belief, has its principal place of business at 101 Metro Drive  
25 Suite 510, San Jose, California 95110. On information and belief, CMO USA is a  
26 subsidiary of Chi Mei Optoelectronics Japan Co., Ltd., which is itself a subsidiary  
27 of CMI. On information and belief, CMO USA directly and/or indirectly imports,  
28

1 sells and/or offers for sale in California and elsewhere in the United States  
2 products manufactured by CMI.

3 4. Defendant Acer is organized under the laws of California and, on  
4 information and belief, has its principal place of business at 333 W. San Carlos St.,  
5 Suite 1500, San Jose, California 95110. Acer is a domestic subsidiary of Acer, Inc.  
6 that directly and/or indirectly makes, imports, sells, and/or offers for sale its  
7 products in California and elsewhere in the United States.

8 5. Defendant ViewSonic is organized under the laws of Delaware and,  
9 on information and belief, has its principal place of business at 381 Brea Canyon  
10 Rd., Walnut, California 91789. ViewSonic directly and/or indirectly makes,  
11 imports, sells, and/or offers for sale its products in California and elsewhere in the  
12 United States.

13 6. Defendant VIZIO is organized under the laws of Delaware and, on  
14 information and belief, has its principal place of business at 39 Tesla, Irvine,  
15 California 92618. VIZIO directly and/or indirectly makes, imports, sells, and/or  
16 offers for sale its products in California and elsewhere in the United States.

17 7. Defendant Westinghouse is organized under the laws of Delaware  
18 and, on information and belief, has its principal place of business at 500 North  
19 State College Boulevard, Suite 1300, Orange, California 92868. Westinghouse  
20 directly and/or indirectly makes, imports, sells, and/or offers for sale its products in  
21 California and elsewhere in the United States.

## 22 JURISDICTION

23 8. This is an action arising under the patent laws of the United States,  
24 Title 35 of the United States Code. This Court has subject matter jurisdiction  
25 under 28 U.S.C. §§ 1331 and 1338(a).

26 9. This Court has personal jurisdiction over each Defendant. Each  
27 Defendant, directly and/or through intermediaries or established distribution  
28 channels (including distributors, online retailers, and others), ships, distributes,

1 offers for sale, sells, and/or advertises its products in or into the United States, the  
2 State of California, and this District. Each Defendant has purposefully and  
3 voluntarily placed one or more of its infringing products, as described herein, into  
4 the stream of commerce with the expectation that they will be purchased by  
5 customers within this District. These infringing products have been, and continue  
6 to be, purchased by customers within this District. On information and belief,  
7 Defendants derive substantial revenue from the sale of infringing products  
8 distributed within this District, and/or expect or should reasonably expect their  
9 actions to have consequences within this District, and derive substantial revenue  
10 from interstate and international commerce. In addition, Defendants continue to  
11 knowingly induce infringement within this State and within this District by  
12 contracting with others to market and sell infringing products with the knowledge  
13 and intention of facilitating infringing sales of the infringing products by others  
14 within this District.

15 10. Acer and VIZIO have agents for service in this District and, on  
16 information and belief, ViewSonic, VIZIO, and Westinghouse have their principal  
17 place of business in this District.

#### 18 VENUE

19 11. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b),  
20 (c) and (d) and 1400(b) because this is an action for patent infringement, CMI is an  
21 alien, and the Defendants reside in this District.

22 12. CMO USA, Acer, ViewSonic, VIZIO, and Westinghouse are  
23 authorized to do business, are doing business and/or have a regular and established  
24 place of business in this District, and have committed, or have induced, acts of  
25 infringement in this District.

#### 26 PATENTS-IN-SUIT

27 13. United States Patent No. 6,404,480 (“the `480 patent”), entitled  
28 “Contact Structure,” was duly and legally issued by the United States Patent and

1 Trademark Office on June 11, 2002. The `480 patent has been re-examined by the  
2 United States Patent and Trademark Office pursuant to a request by CMO for such  
3 re-examination. The United States Patent and Trademark Office issued a Re-  
4 examination Certificate on December 30, 2008, reaffirming the patentability of all  
5 claims of the `480 patent without amendment. A true and correct copy of the `480  
6 patent and Reexamination Certificate is attached hereto as Exhibit A and is  
7 incorporated herein by this reference.

8 14. United States Patent No. 7,697,102 (“the `102 patent”), entitled  
9 “Contact Structure,” was duly and legally issued by the United States Patent and  
10 Trademark Office on April 13, 2010. A true and correct copy of the `102 patent is  
11 attached hereto as Exhibit B and is incorporated herein by this reference.

12 15. United States Patent No. 7,876,413 (“the `413 patent”), entitled  
13 “Electronic Apparatus With a Flexible Printed Circuit and a Transparent  
14 Conductive Layer,” was duly and legally issued by the United States Patent and  
15 Trademark Office on January 25, 2011. A true and correct copy of the `413 patent  
16 is attached hereto as Exhibit C and is incorporated herein by this reference.

17 16. United States Patent No. 7,923,311 (“the `311 patent”), entitled  
18 “Electro-Optical Device and Thin Film Transistor and Method for Forming the  
19 Same,” was duly and legally issued by the United States Patent and Trademark  
20 Office on April 12, 2011. A true and correct copy of the `311 patent is attached  
21 hereto as Exhibit D and is incorporated herein by this reference.

22 17. United States Patent No. 7,956,978 (“the `978 patent”), entitled  
23 “Liquid-Crystal Display Device Having a Particular Conductive Layer,” was duly  
24 and legally issued by the United States Patent and Trademark Office on June 7,  
25 2011. A true and correct copy of the `978 patent is attached hereto as Exhibit E  
26 and is incorporated herein by this reference.

27 18. United States Patent No. 8,068,204 (“the `204 patent”), entitled  
28 “Electronic Apparatus With a Flexible Printed Circuit and a Transparent

1 Conductive Layer,” was duly and legally issued by the United States Patent and  
2 Trademark Office on November 29, 2011. A true and correct copy of the `204  
3 patent is attached hereto as Exhibit F and is incorporated herein by this reference.

4 19. SEL is the owner of all right, title and interest in and to the `480, `102,  
5 `413, `311, `978, and `204 patents (collectively the “Patents-in-Suit”) and is  
6 entitled to sue for past and future infringement.

## 7 BACKGROUND

### 8 **SEL Is a Technology Pioneer**

9 20. Established in 1980, SEL is a Japanese company that develops  
10 technology in the fields of, among others, semiconductor thin-film transistors, thin-  
11 film integrated circuits, liquid crystal displays, computer processing units on glass  
12 and on plastic substrates, organic light-emitting diode displays, and solar energy.  
13 SEL is headquartered in Atsugi-shi, Japan and employs over 700 people.

14 21. SEL’s employees, including scientists, perform research and  
15 development in the field of, among others, semiconductor integrated circuits and  
16 thin-film transistors for driving displays used in LCD TVs, computer monitors, cell  
17 phone displays, and other products. As a part of its research and development,  
18 SEL designs electronic circuits through simulation using a supercomputer and then  
19 designs photomasks that it uses in manufacturing prototype displays and  
20 semiconductor devices in SEL’s clean room facility. SEL then evaluates, analyzes,  
21 and further improves the prototype displays and semiconductor devices.

22 22. SEL and its scientists have received awards for technology they  
23 developed, including, among others, the National Commendation for Invention  
24 Award from the Japan Institute of Invention and Innovation in 2007 and again in  
25 2010. SEL received the Okochi Memorial Technology Award from the Okochi  
26 Memorial Foundation in 2010, as a co-recipient with Sharp Corp. In 2009, SEL  
27 and co-recipient Sharp Corp. received a Commendation for Science and  
28 Technology by the Japanese Minister of Education, Culture, Sports, Science and

1 Technology. In 2002, SEL received an Intellectual Property Merit Award from the  
2 Japan Patent Office. Other awards include an award for display products of the  
3 year from the Society for Information Display, the Grand Prize of Advanced  
4 Display (diploma of merit) in 2000, the Director Prize from the Science and  
5 Technology Agency of Japan, and the Medal with Purple Ribbon, an award  
6 bestowed by the Japanese Prime Minister's Office.

7 23. Many of SEL's contributions to its fields of research have been  
8 formally documented in publications and thousands of issued patents, including in  
9 the United States. SEL has contributed to the advancement of thin-film transistor  
10 liquid-crystal display technology, resulting in the improvement of commercial  
11 products based on that technology, including large-screen LCD TVs, computer  
12 monitors, and screens for cell phones, digital cameras, and other products. SEL's  
13 research has led to, among other beneficial advances, longer-lasting LCD devices,  
14 improvements in display quality, an increase in display area for a given size  
15 screen, and lower manufacturing costs. Some of the world's most important  
16 technology companies have taken notice of SEL's contributions and  
17 accomplishments by providing significant capital investment in SEL in exchange  
18 for shares of SEL stock, including TDK Corporation, which owns about 30% of  
19 SEL.

20 24. SEL's contributions and advancements in the field of TFT-LCD  
21 technology include the inventions described and claimed in the six Patents-in-Suit,  
22 among others.

### 23 **Thin-Film Transistor Liquid-Crystal Displays**

24 25. An important field of research for SEL has been in the area of thin-  
25 film transistor liquid-crystal displays ("TFT-LCD"). Modern TFT-LCD screens  
26 use an active-matrix structure in which each LCD pixel is individually controlled  
27 by a thin-film transistor ("TFT").  
28

1           26. A TFT-LCD screen generally consists of a backlight and two glass  
2 substrates (a back substrate and a front substrate spaced several millionths of a  
3 meter apart) with liquid crystal material sandwiched between them. The back  
4 substrate typically contains an array of thousands or millions of TFTs, which are  
5 electronic switching devices made of microscopically thin films, including  
6 semiconductor material, that turn each individual pixel in the display “on” or “off”  
7 so that collectively the pixels form an image on the screen. The front substrate is  
8 fitted with color filters (each pixel has a color filter, typically using the primary  
9 colors of red, blue and green) and a polarizer. The amount of light that is permitted  
10 to pass through the polarizer and color filter on the front substrate is determined by  
11 the polarization state of that light, which in turn is determined by whether the TFT  
12 for a given pixel is “on” or “off.” When the TFT is turned “on,” the electrical  
13 charge passing through the TFT causes a rotation in the angle of the liquid crystal  
14 molecules in proximity to that TFT. Thus, light from the backlight passing through  
15 a pixel with an “on” TFT and, consequently, with rotated liquid crystal molecules,  
16 will pass through the polarizer and color filter to create a pixel of color on the  
17 display screen. On the other hand, light from the backlight that passes through a  
18 pixel with an “off” TFT and, therefore, with non-rotated liquid crystal molecules,  
19 will be absorbed by the polarizer on the front substrate and will not appear on the  
20 display screen.

21           27. The TFT-LCD technology is widely used because it enables  
22 thousands or millions of TFTs to work independently to control thousands or  
23 millions of pixels that together form sharp, vibrant images on screens of LCD TVs,  
24 computer monitors, laptop computers, cell phones, and other products.

#### 25 **Defendants’ Knowledge of SEL’s Patents**

26           28. Before the formation of CMI, SEL previously filed a lawsuit against  
27 CMO, International Display Technology USA, Inc. (which, on information and  
28 belief, later became Chi Mei Optoelectronics USA, Inc.), Westinghouse Digital



1 Electronics, LLC (which, on information and belief, later became Westinghouse  
2 Digital, LLC), International Display Technology Co., Ltd. (which, on information  
3 and belief, later became Chi Mei Optoelectronics Japan Co., Ltd.), and CTX  
4 Technology Corp. on November 3, 2004, for infringement of four patents owned  
5 by SEL, in the Northern District of California having case no. 04-cv-04675-MHP  
6 (“the CMO Litigation”). The `480 patent was among the four patents asserted in  
7 the CMO Litigation.

8         29. During the CMO Litigation, the court granted SEL’s motion for  
9 summary judgment that products sold by CMO infringed the `480 patent.

10         30. CMO filed a request with the United States Patent and Trademark  
11 Office for *ex parte* reexamination of the `480 patent on March 24, 2006, while the  
12 CMO Litigation was pending, which was subsequently granted and given Control  
13 No. 90/007,985.

14         31. On December 30, 2008, the United States Patent and Trademark  
15 Office issued a Re-examination Certificate reaffirming the patentability, without  
16 amendment, of all claims in the `480 patent.

17         32. Following a settlement entered into between SEL and CMO, Chi Mei  
18 Optoelectronics Japan Co., Ltd., CMO USA, and Westinghouse, the CMO  
19 Litigation was dismissed July 6, 2007.

20 **Communications Between SEL and CMI**

21         33. On May 7, 2010, SEL sent a letter to CMI offering a license to SEL’s  
22 patents.

23         34. SEL sent another letter to CMI on November 3, 2010, offering a  
24 license to CMI for the use of certain SEL patents including the `480 and `102  
25 patents. CMI responded to SEL’s November 3 letter on November 18, 2010, and  
26 requested more technical information from SEL concerning its patents and CMI’s  
27 products.

1           35. In a letter dated November 22, 2010, SEL responded to CMI and  
2 requested a meeting to explain the relevance between SEL's patents and CMI's  
3 products.

4           36. SEL's counsel sent CMI a letter on December 22, 2011, addressed to  
5 Mr. Charles Hsu, Director, Patent Division, Legal & IP Center of CMI, with a copy  
6 to Mr. Peterson Tien, Vice President and General Counsel of CMI, stating that  
7 several CMI products being sold in the United States infringed certain of SEL's  
8 patents. Specifically, the December 22 letter stated the six Patents-in-Suit, among  
9 others, were being infringed by the following CMI products that were being  
10 incorporated into end products that were being sold in the United States: CMI LCD  
11 modules model numbers CMI Module Numbers V315H3-LE4 Rev.C1, V260H1-  
12 LE2 Rev.C1, V315B6-P01 Rev.C5, M270H3-L01 Rev.C1, M236H3-L05 Rev.C2,  
13 M270H1-L01 Rev.C1, M236H3-LA2 Rev.C1, MT215DW02, and MT215DW01  
14 (collectively "CMI Products"). Furthermore, the December 22 letter stated that  
15 CMI's continued distribution of the listed LCD modules constituted active  
16 inducement of third parties, including at least Acer, ViewSonic, VIZIO, and  
17 Westinghouse, to infringe the Patents-in-Suit, given that CMI supplies the CMI  
18 Products to these customers with the knowledge (a) that the CMI Products will be  
19 incorporated into the customer's products, (b) that the CMI Products will be  
20 imported into and sold within the U.S., and (c) that the CMI Products infringe the  
21 Patents-in-Suit.

22           37. CMI has directly and/or indirectly imported, offered for sale, and sold  
23 the CMI Products, and continues to import, offer for sale, and sell the CMI  
24 Products into and/or in California and elsewhere in the United States, directly and  
25 through established distribution channels involving various third parties, knowing  
26 that these third parties will use their respective nationwide contacts and distribution  
27 channels to import, sell, offer for sale, and/or use the CMI Products in California  
28 and elsewhere in the United States. These distribution channels include at least

1 CMO USA, Acer, ViewSonic, VIZIO, and Westinghouse. CMI intends for the  
2 CMI Products to enter the United States, and CMI knows or reasonably should  
3 know that the CMI Products infringe the six Patents-in-Suit.

4 38. On information and belief, CMO USA has directly and/or indirectly  
5 imported and sold, and continues to import and sell, into and/or in California and  
6 elsewhere in the United States, the CMI Products that infringe the SEL patents.  
7 Furthermore, on information and belief, CMO USA has supplied to third parties,  
8 and continues to supply to third parties the CMI Products knowing that the CMI  
9 Products will be sold, offered for sale, and/or used in California and elsewhere in  
10 the United States.

11 39. Acer has imported and sold, and continues to import and sell, into  
12 and/or in California and elsewhere in the United States, LCD-type products that  
13 incorporate the CMI Products that infringe at least certain of the Patents-in-Suit.

14 40. ViewSonic has imported and sold, and continues to import and sell,  
15 into and/or in California and elsewhere in the United States, LCD-type products  
16 that incorporate the CMI Products that infringe at least certain of the Patents-in-  
17 Suit.

18 41. VIZIO has imported and sold, and continues to import and sell, into  
19 and/or in California and elsewhere in the United States, LCD-type products that  
20 incorporate the CMI Products that infringe at least certain of the Patents-in-Suit.

21 42. Westinghouse has imported and sold, and continues to import and sell,  
22 into and/or in California and elsewhere in the United States, LCD-type products  
23 that incorporate the CMI Products that infringe at least certain of the Patents-in-  
24 Suit.

25 43. CMI has had actual notice in accordance with 35 U.S.C. § 287 as to  
26 the six Patents-in-Suit. Specifically, on information and belief, CMI personnel,  
27 who were employees of CMO prior to the merger of CMO with Innolux Display  
28 Corporation and TPO Displays Corporation, had notice of the '480 patent by no

1 later than November 3, 2004, the date the CMO Litigation was filed. Therefore, on  
2 information and belief, such CMI personnel had notice of the `480 patent by no  
3 later than November 3, 2004. CMO USA and Westinghouse also had actual notice  
4 of the `480 patent by no later than November 3, 2004 based on the CMO  
5 Litigation, in which they were defendants. CMI had notice of the `480 patent and  
6 the `102 patent by no later than November 3, 2010, and CMI had notice of the  
7 `413, `311, `978, and `204 patents by no later than December 22, 2011.

8 44. All of the Defendants have notice of the six Patents-in-Suit by the  
9 filing of this Complaint.

10  
11 **COUNT I – INFRINGEMENT OF U.S. PATENT NO. 6,404,480**

12 45. SEL repeats and realleges the allegations in paragraphs 1-44,  
13 inclusive.

14 46. On June 11, 2002, the United States Patent and Trademark Office  
15 issued the `480 patent, entitled “Contact Structure.” SEL is the owner, by means  
16 of assignment, of the `480 patent. SEL is entitled to sue and recover damages for  
17 past and future infringement of the `480 patent. The `480 patent is a duly and  
18 legally issued United States patent.

19 47. Defendant CMI and, upon information and belief, Defendant CMO  
20 USA have infringed and/or induced infringement of, and are continuing to infringe  
21 and/or induce infringement of, one or more of the `480 patent claims, including but  
22 not limited to claim 1, by making, using, selling, offering for sale, and/or importing  
23 at least the following CMI Products and any similar products and related  
24 technology: CMI Module Numbers V315H3-LE4 Rev.C1; V260H1-LE2 Rev.C1;  
25 V315B6-P01 Rev.C5; M270H3-L01 Rev.C1; M236H3-L05 Rev.C2 ; M270H1-  
26 L01 Rev.C1; and M236H3-LA2 Rev.C1. Defendants CMI and CMO USA are  
27 liable for their infringement of the `480 patent pursuant to 35 U.S.C. § 271.

28

1           48. Defendant Acer has infringed and/or induced infringement of, and is  
2 continuing to infringe and/or induce infringement of, one or more of the `480  
3 patent claims, including but not limited to claim 1, by making, using, selling,  
4 offering for sale, and/or importing at least the following CMI Products and any  
5 similar products and related technology: CMI Module Number M270H3-L01  
6 Rev.C1 found in Acer product number S273HL bmii; and CMI Module Number  
7 M236H3-L05 Rev.C2 found in Acer product number HS244HQ bmii. Defendant  
8 Acer is liable for its infringement of the `480 patent pursuant to 35 U.S.C. § 271.

9           49. Defendant ViewSonic has infringed and/or induced infringement of,  
10 and is continuing to infringe and/or induce infringement of, one or more of the  
11 `480 patent claims, including but not limited to claim 1, by making, using, selling,  
12 offering for sale, and/or importing at least the following CMI Products and any  
13 similar products and related technology: CMI Module Number M270H1-L01  
14 Rev.C1 found in ViewSonic product number VX2739wm; and CMI Module  
15 Number M236H3-LA2 Rev.C1 found in ViewSonic product number VX2450wm-  
16 LED. Defendant ViewSonic is liable for its infringement of the `480 patent  
17 pursuant to 35 U.S.C. § 271.

18           50. Defendant VIZIO has infringed and/or induced infringement of, and is  
19 continuing to infringe and/or induce infringement of, one or more of the `480  
20 patent claims, including but not limited to claim 1, by making, using, selling,  
21 offering for sale, and/or importing at least the following CMI Products and any  
22 similar products and related technology: CMI Module Number V315H3-LE4  
23 Rev.C1 found in VIZIO product number E322MV; and CMI Module Number  
24 V260H1-LE2 Rev.C1 found in VIZIO product number E260MV. Defendant  
25 VIZIO is liable for its infringement of the `480 patent pursuant to 35 U.S.C. § 271.

26           51. Defendant Westinghouse has infringed and/or induced infringement  
27 of, and is continuing to infringe and/or induce infringement of, one or more of the  
28 `480 patent claims, including but not limited to claim 1, by making, using, selling,

1 offering for sale, and/or importing at least the following CMI Product and any  
2 similar product and related technology: CMI Module Number V315B6-P01  
3 Rev.C5 found in Westinghouse product number LD-3255VX. Defendant  
4 Westinghouse is liable for its infringement of the `480 patent pursuant to 35 U.S.C.  
5 § 271.

6 52. With knowledge of the `480 patent and its infringement of the `480  
7 patent, Defendant CMI also has infringed and continues to infringe one or more of  
8 the `480 patent claims, including but not limited to claim 1, by actively inducing  
9 others, including at least CMO USA, Acer, ViewSonic, VIZIO, and Westinghouse,  
10 to use, sell, import, and/or offer for sale infringing products in the United States.  
11 Upon information and belief, Defendants CMO USA, Acer, ViewSonic, VIZIO,  
12 and Westinghouse have infringed and continue to infringe one or more of the `480  
13 patent claims, including but not limited to claim 1, by actively inducing others,  
14 including their customers, to use, sell, import, and/or offer for sale infringing  
15 products in the United States.

16 53. Upon information and belief, Defendants' infringement of the `480  
17 patent is willful, intentional, and deliberate. Defendants' infringement of the `480  
18 patent has damaged and will continue to damage SEL. Defendants had actual  
19 knowledge of the `480 patent based upon the CMO Litigation, the reexamination  
20 of the `480 patent, SEL's letter to CMI dated November 3, 2010, the notice letter  
21 sent by SEL's counsel to CMI dated December 22, 2011, and/or the filing of this  
22 Complaint. Nevertheless, Defendants have willfully, deliberately, and  
23 intentionally infringed and continue to infringe the `480 patent despite an  
24 objectively high likelihood that their actions constituted infringement.

25 54. Defendants' infringement of the `480 patent has caused and will  
26 continue to cause SEL irreparable harm unless enjoined by the Court. SEL has no  
27 adequate remedy at law. SEL's damages from the infringing activities of  
28 Defendants are not yet determined.

1  
2           **COUNT II – INFRINGEMENT OF U.S. PATENT NO. 7,697,102**

3           55. SEL repeats and realleges the allegations in paragraphs 1-54,  
4 inclusive.

5           56. On April 13, 2010, the United States Patent and Trademark Office  
6 issued the `102 patent, entitled “Contact Structure.” SEL is the owner, by means  
7 of assignment, of the `102 patent. SEL is entitled to sue and recover damages for  
8 past and future infringement of the `102 patent. The `102 patent is a duly and  
9 legally issued United States patent.

10          57. Defendant CMI and, upon information and belief, Defendant CMO  
11 USA have infringed and/or induced infringement of, and are continuing to infringe  
12 and/or induce infringement of, one or more of the `102 patent claims, including but  
13 not limited to claims 15 and 27, by making, using, selling, offering for sale, and/or  
14 importing at least the following CMI Products and any similar products and related  
15 technology: CMI Module Numbers V315H3-LE4 Rev.C1; V260H1-LE2 Rev.C1;  
16 V315B6-P01 Rev.C5; M270H3-L01 Rev.C1; M236H3-L05 Rev.C2; M270H1-L01  
17 Rev.C1; and M236H3-LA2 Rev.C1. Defendants CMI and CMO USA are liable  
18 for their infringement of the `102 patent pursuant to 35 U.S.C. § 271.

19          58. Defendant Acer has infringed and/or induced infringement of, and is  
20 continuing to infringe and/or induce infringement of, one or more of the `102  
21 patent claims, including but not limited to claims 15 and 27, by making, using,  
22 selling, offering for sale, and/or importing at least the following CMI Products and  
23 any similar products and related technology: CMI Module Number M270H3-L01  
24 Rev.C1 found in Acer product number S273HL bmii; and CMI Module Number  
25 M236H3-L05 Rev.C2 found in Acer product number HS244HQ bmii. Defendant  
26 Acer is liable for its infringement of the `102 patent pursuant to 35 U.S.C. § 271.

27          59. Defendant ViewSonic has infringed and/or induced infringement of,  
28 and is continuing to infringe and/or induce infringement of, one or more of the

1 `102 patent claims, including but not limited to claims 15 and 27, by making,  
2 using, selling, offering for sale, and/or importing at least the following CMI  
3 Products and any similar products and related technology: CMI Module Number  
4 M270H1-L01 Rev.C1 found in ViewSonic product number VX2739wm; and CMI  
5 Module Number M236H3-LA2 Rev.C1 found in ViewSonic product number  
6 VX2450wm-LED. Defendant ViewSonic is liable for its infringement of the `102  
7 patent pursuant to 35 U.S.C. § 271.

8         60. Defendant VIZIO has infringed and/or induced infringement of, and is  
9 continuing to infringe and/or induce infringement of, one or more of the `102  
10 patent claims, including but not limited to claim 15, by making, using, selling,  
11 offering for sale, and/or importing at least the following CMI Product and any  
12 similar product and related technology: CMI Module Number V315H3-LE4  
13 Rev.C1 found in VIZIO product number E322MV. Defendant VIZIO also has  
14 infringed and/or induced infringement of, and is continuing to infringe and/or  
15 induce infringement of, one or more of the `102 patent claims, including but not  
16 limited to claims 15 and 27, by making, using, selling, offering for sale, and/or  
17 importing at least the following CMI Product and any similar product and related  
18 technology: CMI Module Number V260H1-LE2 Rev.C1 found in VIZIO product  
19 number E260MV. Defendant VIZIO is liable for its infringement of the `102  
20 patent pursuant to 35 U.S.C. § 271.

21         61. Defendant Westinghouse has infringed and/or induced infringement  
22 of, and is continuing to infringe and/or induce infringement of, one or more of the  
23 `102 patent claims, including but not limited to claim 15, by making, using, selling,  
24 offering for sale, and/or importing at least the following CMI Product and any  
25 similar product and related technology: CMI Module Number V315B6-P01  
26 Rev.C5 found in Westinghouse product number LD-3255VX. Defendant  
27 Westinghouse is liable for its infringement of the `102 patent pursuant to 35 U.S.C.  
28 § 271.



1           62. With knowledge of the `102 patent and its infringement of the `102  
2 patent, Defendant CMI also has infringed and continues to infringe one or more of  
3 the `102 patent claims, including but not limited to claims 15 and 27, by actively  
4 inducing others, including at least CMO USA, Acer, ViewSonic, VIZIO, and  
5 Westinghouse, to use, sell, import, and/or offer for sale infringing products in the  
6 United States. Upon information and belief, Defendants CMO USA, Acer,  
7 ViewSonic, VIZIO, and Westinghouse have infringed and continue to infringe one  
8 or more of the `102 patent claims, including but not limited to claims 15 and 27, by  
9 actively inducing others, including their customers, to use, sell, import, and/or  
10 offer for sale infringing products in the United States.

11           63. Upon information and belief, Defendants' infringement of the `102  
12 patent is willful, intentional, and deliberate. Defendants' infringement of the `102  
13 patent has damaged and will continue to damage SEL. Defendants had actual  
14 knowledge of the `102 patent based upon SEL's letter to CMI dated November 3,  
15 2010, the notice letter sent by SEL's counsel to CMI dated December 22, 2011,  
16 and/or the filing of this Complaint. Nevertheless, Defendants have willfully,  
17 deliberately, and intentionally infringed and continue to infringe the `102 patent  
18 despite an objectively high likelihood that their actions constituted infringement.

19           64. Defendants' infringement of the `102 patent has caused and will  
20 continue to cause SEL irreparable harm unless enjoined by the Court. SEL has no  
21 adequate remedy at law. SEL's damages from the infringing activities of  
22 Defendants are not yet determined.

23  
24           **COUNT III – INFRINGEMENT OF U.S. PATENT NO. 7,876,413**

25           65. SEL repeats and realleges the allegations in paragraphs 1-64,  
26 inclusive.

27           66. On January 25, 2011, the United States Patent and Trademark Office  
28 issued the `413 patent, entitled "Electronic Apparatus With a Flexible Printed

1 Circuit and a Transparent Conductive Layer.” SEL is the owner, by means of  
2 assignment, of the `413 patent. SEL is entitled to sue and recover damages for past  
3 and future infringement of the `413 patent. The `413 patent is a duly and legally  
4 issued United States patent.

5 67. Defendant CMI and, upon information and belief, Defendant CMO  
6 USA have infringed and/or induced infringement of, and are continuing to infringe  
7 and/or induce infringement of, one or more of the `413 patent claims, including but  
8 not limited to claim 1, by making, using, selling, offering for sale, and/or importing  
9 at least the following CMI Products and any similar products and related  
10 technology: CMI Module Numbers V315H3-LE4 Rev.C1; V260H1-LE2 Rev.C1;  
11 V315B6-P01 Rev.C5; M270H3-L01 Rev.C1; M236H3-L05 Rev.C2 ; M270H1-  
12 L01 Rev.C1; and M236H3-LA2 Rev.C1. Defendants CMI and CMO USA are  
13 liable for their infringement of the `413 patent pursuant to 35 U.S.C. § 271.

14 68. Defendant Acer has infringed and/or induced infringement of, and is  
15 continuing to infringe and/or induce infringement of, one or more of the `413  
16 patent claims, including but not limited to claim 1, by making, using, selling,  
17 offering for sale, and/or importing at least the following CMI Products and any  
18 similar products and related technology: CMI Module Number M270H3-L01  
19 Rev.C1 found in Acer product number S273HL bmii; and CMI Module Number  
20 M236H3-L05 Rev.C2 found in Acer product number HS244HQ bmii. Defendant  
21 Acer is liable for its infringement of the `413 patent pursuant to 35 U.S.C. § 271.

22 69. Defendant ViewSonic has infringed and/or induced infringement of,  
23 and is continuing to infringe and/or induce infringement of, one or more of the  
24 `413 patent claims, including but not limited to claim 1, by making, using, selling,  
25 offering for sale, and/or importing at least the following CMI Products and any  
26 similar products and related technology: CMI Module Number M270H1-L01  
27 Rev.C1 found in ViewSonic product number VX2739wm; and CMI Module  
28 Number M236H3-LA2 Rev.C1 found in ViewSonic product number VX2450wm-

1 LED. Defendant ViewSonic is liable for its infringement of the `413 patent  
2 pursuant to 35 U.S.C. § 271.

3 70. Defendant VIZIO has infringed and/or induced infringement of, and is  
4 continuing to infringe and/or induce infringement of, one or more of the `413  
5 patent claims, including but not limited to claim 1, by making, using, selling,  
6 offering for sale, and/or importing at least the following CMI Products and any  
7 similar products and related technology: CMI Module Number V315H3-LE4  
8 Rev.C1 found in VIZIO product number E322MV; and CMI Module Number  
9 V260H1-LE2 Rev.C1 found in VIZIO product number E260MV. Defendant  
10 VIZIO is liable for its infringement of the `413 patent pursuant to 35 U.S.C. § 271.

11 71. Defendant Westinghouse has infringed and/or induced infringement  
12 of, and is continuing to infringe and/or induce infringement of, one or more of the  
13 `413 patent claims, including but not limited to claim 1, by making, using, selling,  
14 offering for sale, and/or importing at least the following CMI Product and any  
15 similar product and related technology: CMI Module Number V315B6-P01  
16 Rev.C5 found in Westinghouse product number LD-3255VX. Defendant  
17 Westinghouse is liable for its infringement of the `413 patent pursuant to 35 U.S.C.  
18 § 271.

19 72. With knowledge of the `413 patent and its infringement of the `413  
20 patent, Defendant CMI also has infringed and continues to infringe one or more of  
21 the `413 patent claims, including but not limited to claim 1, by actively inducing  
22 others, including at least CMO USA, Acer, ViewSonic, VIZIO, and Westinghouse,  
23 to use, sell, import, and/or offer for sale infringing products in the United States.  
24 Upon information and belief, Defendants CMO USA, Acer, ViewSonic, VIZIO,  
25 and Westinghouse have infringed and continue to infringe one or more of the `413  
26 patent claims, including but not limited to claim 1, by actively inducing others,  
27 including their customers, to use, sell, import, and/or offer for sale infringing  
28 products in the United States.

1 73. Upon information and belief, Defendants' infringement of the `413  
2 patent is willful, intentional, and deliberate. Defendants' infringement of the `413  
3 patent has damaged and will continue to damage SEL. Defendants had actual  
4 knowledge of the `413 patent based upon the notice letter sent by SEL's counsel to  
5 CMI dated December 22, 2011, and/or the filing of this Complaint. Nevertheless,  
6 Defendants have willfully, deliberately, and intentionally infringed and continue to  
7 infringe the `413 patent despite an objectively high likelihood that their actions  
8 constituted infringement.

9 74. Defendants' infringement of the `413 patent has caused and will  
10 continue to cause SEL irreparable harm unless enjoined by the Court. SEL has no  
11 adequate remedy at law. SEL's damages from the infringing activities of  
12 Defendants are not yet determined.

13  
14 **COUNT IV – INFRINGEMENT OF U.S. PATENT NO. 7,923,311**

15 75. SEL repeats and realleges the allegations in paragraphs 1-74,  
16 inclusive.

17 76. On April 12, 2011, the United States Patent and Trademark Office  
18 issued the `311 patent, entitled "Electro-Optical Device and Thin Film Transistor  
19 and Method for Forming the Same." SEL is the owner, by means of assignment,  
20 of the `311 patent. SEL is entitled to sue and recover damages for past and future  
21 infringement of the `311 patent. The `311 patent is a duly and legally issued  
22 United States patent.

23 77. Defendant CMI and, upon information and belief, Defendant CMO  
24 USA have infringed and/or induced infringement of, and are continuing to infringe  
25 and/or induce infringement of one or more of the `311 patent claims, including but  
26 not limited to claim 39, by making, using, selling, offering for sale, and/or  
27 importing at least the following CMI Products and any similar products and related  
28 technology: CMI Module Numbers V315H3-LE4 Rev.C1; V260H1-LE2 Rev.C1;

1 V315B6-P01 Rev.C5; M236H3-L05 Rev.C2 ; M270H1-L01 Rev.C1; M236H3-  
2 LA2 Rev.C1; MT215DW02; and MT215DW01. Defendants CMI and CMO USA  
3 are liable for their infringement of the `311 patent pursuant to 35 U.S.C. § 271.

4 78. Defendant Acer has infringed and/or induced infringement of, and is  
5 continuing to infringe and/or induce infringement of, one or more of the `311  
6 patent claims, including but not limited to claim 39, by making, using, selling,  
7 offering for sale, and/or importing at least the following CMI Product and any  
8 similar product and related technology: CMI Module Number M236H3-L05  
9 Rev.C2 found in Acer product number HS244HQ bmii. Defendant Acer is liable  
10 for its infringement of the `311 patent pursuant to 35 U.S.C. § 271.

11 79. Defendant ViewSonic has infringed and/or induced infringement of,  
12 and is continuing to infringe and/or induce infringement of, one or more of the  
13 `311 patent claims, including but not limited to claim 39, by making, using, selling,  
14 offering for sale, and/or importing at least the following CMI Products and any  
15 similar products and related technology: CMI Module Number M270H1-L01  
16 Rev.C1 found in ViewSonic product number VX2739wm; CMI Module Number  
17 M236H3-LA2 Rev.C1 found in ViewSonic product number VX2450wm-LED;  
18 MT215DW02 found in ViewSonic product number VX2250wm-LED; and  
19 MT215DW01 found in ViewSonic product number VX2250wm-LED. Defendant  
20 ViewSonic is liable for its infringement of the `311 patent pursuant to 35 U.S.C. §  
21 271.

22 80. Defendant VIZIO has infringed and/or induced infringement of, and is  
23 continuing to infringe and/or induce infringement of, one or more of the `311  
24 patent claims, including but not limited to claim 39, by making, using, selling,  
25 offering for sale, and/or importing at least the following CMI Products and any  
26 similar products and related technology: CMI Module Number V315H3-LE4  
27 Rev.C1 found in VIZIO product number E322MV; and CMI Module Number  
28

1 V260H1-LE2 Rev.C1 found in VIZIO product number E260MV. Defendant  
2 VIZIO is liable for its infringement of the '311 patent pursuant to 35 U.S.C. § 271.

3 81. Defendant Westinghouse has infringed and/or induced infringement  
4 of, and is continuing to infringe and/or induce infringement of, one or more of the  
5 '311 patent claims, including but not limited to claim 39, by making, using, selling,  
6 offering for sale, and/or importing at least the following CMI Product and any  
7 similar product and related technology: CMI Module Number V315B6-P01  
8 Rev.C5 found in Westinghouse product number LD-3255VX. Defendant  
9 Westinghouse is liable for its infringement of the '311 patent pursuant to 35 U.S.C.  
10 § 271.

11 82. With knowledge of the '311 patent and its infringement of the '311  
12 patent, Defendant CMI also has infringed and continues to infringe one or more of  
13 the '311 patent claims, including but not limited to claim 39, by actively inducing  
14 others, including at least CMO USA, Acer, ViewSonic, VIZIO, and Westinghouse,  
15 to use, sell, import, and/or offer for sale infringing products in the United States.  
16 Upon information and belief, Defendants CMO USA, Acer, ViewSonic, VIZIO,  
17 and Westinghouse have infringed and continue to infringe one or more of the '311  
18 patent claims, including but not limited to claim 39, by actively inducing others,  
19 including their customers, to use, sell, import, and/or offer for sale infringing  
20 products in the United States.

21 83. Upon information and belief, Defendants' infringement of the '311  
22 patent is willful, intentional, and deliberate. Defendants' infringement of the '311  
23 patent has damaged and will continue to damage SEL. Defendants had actual  
24 knowledge of the '311 patent based upon the notice letter sent by SEL's counsel to  
25 CMI dated December 22, 2011, and/or the filing of this Complaint. Nevertheless,  
26 Defendants have willfully, deliberately, and intentionally infringed and continue to  
27 infringe the '311 patent despite an objectively high likelihood that their actions  
28 constituted infringement.

1 84. Defendants' infringement of the '311 patent has caused and will  
2 continue to cause SEL irreparable harm unless enjoined by the Court. SEL has no  
3 adequate remedy at law. SEL's damages from the infringing activities of  
4 Defendants are not yet determined.

5  
6 **COUNT V – INFRINGEMENT OF U.S. PATENT NO. 7,956,978**

7 85. SEL repeats and realleges the allegations in paragraphs 1-84,  
8 inclusive.

9 86. On June 7, 2011, the United States Patent and Trademark Office  
10 issued the '978 patent, entitled "Liquid-Crystal Display Device Having a Particular  
11 Conductive Layer." SEL is the owner, by means of assignment, of the '978 patent.  
12 SEL is entitled to sue and recover damages for past and future infringement of the  
13 '978 patent. The '978 patent is a duly and legally issued United States patent.

14 87. Defendant CMI and, upon information and belief, Defendant CMO  
15 USA have infringed and/or induced infringement of, and are continuing to infringe  
16 and/or induce infringement of, one or more of the '978 patent claims, including but  
17 not limited to claim 17, by making, using, selling, offering for sale, and/or  
18 importing at least the following CMI Products and any similar products and related  
19 technology: CMI Module Numbers MT215DW02 and MT215DW01. Defendants  
20 CMI and CMO USA are liable for their infringement of the '978 patent pursuant to  
21 35 U.S.C. § 271.

22 88. Defendant ViewSonic has infringed and/or induced infringement of,  
23 and is continuing to infringe and/or induce infringement of, one or more of the  
24 '978 patent claims, including but not limited to claim 17, by making, using, selling,  
25 offering for sale, and/or importing at least the following CMI Products and any  
26 similar products and related technology: CMI Module Number MT215DW02  
27 found in ViewSonic product number VX2250wm-LED; and CMI Module Number  
28 MT215DW01 found in ViewSonic product number VX2250wm-LED. Defendant

1 ViewSonic is liable for its infringement of the '978 patent pursuant to 35 U.S.C. §  
2 271.

3 89. With knowledge of the '978 patent and its infringement of the '978  
4 patent, Defendant CMI also has infringed and continues to infringe one or more of  
5 the '978 patent claims, including but not limited to claim 17, by actively inducing  
6 others, including at least CMO USA and ViewSonic, to use, sell, import, and/or  
7 offer for sale infringing products in the United States. Upon information and  
8 belief, Defendants CMO USA and ViewSonic have infringed and continue to  
9 infringe one or more of the '978 patent claims, including but not limited to claim  
10 17, by actively inducing others, including their customers, to use, sell, import,  
11 and/or offer for sale infringing products in the United States.

12 90. Upon information and belief, the infringement by Defendants CMI,  
13 CMO USA, and ViewSonic of the '978 patent is willful, intentional, and  
14 deliberate. The infringement by Defendants CMI, CMO USA, and ViewSonic of  
15 the '978 patent has damaged and will continue to damage SEL. Defendants CMI,  
16 CMO USA, and ViewSonic had actual knowledge of the '978 patent based upon  
17 the notice letter sent by SEL's counsel to CMI dated December 22, 2011, and/or  
18 the filing of this Complaint. Nevertheless, Defendants CMI, CMO USA, and  
19 ViewSonic have willfully, deliberately, and intentionally infringed and continue to  
20 infringe the '978 patent despite an objectively high likelihood that their actions  
21 constituted infringement.

22 91. The infringement by Defendants CMI, CMO USA, and ViewSonic of  
23 the '978 patent has caused and will continue to cause SEL irreparable harm unless  
24 enjoined by the Court. SEL has no adequate remedy at law. SEL's damages from  
25 the infringing activities of Defendants CMI, CMO USA, and ViewSonic are not  
26 yet determined.



1                   **COUNT VI – INFRINGEMENT OF U.S. PATENT NO. 8,068,204**

2           92.   SEL repeats and realleges the allegations in paragraphs 1-91,  
3 inclusive.

4           93.   On November 29, 2011, the United States Patent and Trademark  
5 Office issued the `204 patent, entitled “Electronic Apparatus With a Flexible  
6 Printed Circuit and a Transparent Conductive Layer.” SEL is the owner, by means  
7 of assignment, of the `204 patent. SEL is entitled to sue and recover damages for  
8 past and future infringement of the `204 patent. The `204 patent is a duly and  
9 legally issued United States patent.

10          94.   Defendant CMI and, upon information and belief, Defendant CMO  
11 USA have infringed and/or induced infringement of, and are continuing to infringe  
12 and/or induce infringement of, one or more of the `204 patent claims, including but  
13 not limited to claims 31 and 54, by making, using, selling, offering for sale, and/or  
14 importing at least the following CMI Products and any similar products and related  
15 technology: CMI Module Numbers V315H3-LE4 Rev.C1 and V260H1-LE2  
16 Rev.C1. Defendants CMI and CMO USA are liable for their infringement of the  
17 `204 patent pursuant to 35 U.S.C. § 271.

18          95.   Defendant VIZIO has infringed and/or induced infringement of, and is  
19 continuing to infringe and/or induce infringement of, one or more of the `204  
20 patent claims, including but not limited to claims 31 and 54, by making, using,  
21 selling, offering for sale, and/or importing at least the following CMI Products and  
22 any similar products and related technology: CMI Module Number V315H3-LE4  
23 Rev.C1 found in VIZIO product number E322MV; and CMI Module Number  
24 V260H1-LE2 Rev.C1 found in VIZIO product number E260MV. Defendant  
25 VIZIO is liable for its infringement of the `204 patent pursuant to 35 U.S.C. § 271.

26          96.   With knowledge of the `204 patent and its infringement of the `204  
27 patent, Defendant CMI also has infringed and continues to infringe one or more of  
28 the `204 patent claims, including but not limited to claims 31 and 54, by actively