IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARENDI S.A.R.L., Plaintiff, v. LG ELECTRONICS, INC. and LG ELECTRONICS USA, INC. Defendants.	C.A. No. _____ JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Arendi S.A.R.L. ("Arendi") brings this action for infringement of U.S. Patent No. 7,917,843 ("the '843 Patent") under 35 U.S.C. §271 against Defendants LG Electronics, Inc. and LG Electronics USA, Inc. (collectively, "LG" or "Defendants"), demands a jury trial, and alleges:

Related Actions

1. This case is related to the following cases currently pending before Chief Judge Stark in this District:

- Arendi S.A.R.L v. LG Electronics, Inc. et al., Case No. 12-1595-LPS
- Arendi S.A.R.L v. Apple, Inc., Case No. 12-1596-LPS
- Arendi S.A.R.L v. Blackberry Limited et al., Case No. 12-1597-LPS
- Arendi S.A.R.L v. HTC Corp., Case No. 12-1600-LPS
- Arendi S.A.R.L v. Motorola Mobility LLC, Case No. 12-1601-LPS
- Arendi S.A.R.L v. Sony Mobile Communications (USA) et al., Case No. 12-1602-LPS
- Arendi S.A.R.L v. Google LLC, Case No. 13-919-LPS
- Arendi v. Oath Inc., Case No. 13-920-LPS

2. This case is related to the following cases that were pending before Chief Judge Stark in this District but have since been dismissed:

- Arendi S.A.R.L v. Samsung Electronics Co., LTD et al., Case No. 12-1598-LPS
- Arendi S.A.R.L v. Microsoft Mobile (f/k/a Nokia Inc.), Case No. 12-1599-LPS

Parties

3. Plaintiff Arendi is a *Société à responsabilité limitée* organized and existing under the law of Luxembourg with its principle place of business in Luxembourg.

4. Defendant LG Electronics, Inc. ("LGE") is a South Korean corporation with its principle place of business of LG Twin Towers, 20 Yeouido-dong, Yeongdeungpo-gu, Seoul, Republic of Korea 150-721.

5. Defendant LG Electronics USA, Inc. ("LG USA") is a wholly owned subsidiary of LGE and is a Delaware corporation with its principle place of business at 1000 Sylvan Avenue, Englewood Cliffs, New Jersey 07632. Upon information and belief, Defendant may be served with process c/o United States Corporation Company, 251 Little Falls Drive, Wilmington, Delaware 19808.

Jurisdiction and Venue

6. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1, et seq., including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This Court has subject matter jurisdiction over this patent infringement action under 28 U.S.C §1331 and 1338(a).

7. This Court has personal jurisdiction over Defendants by virtue of their systematic and continuous contacts with this jurisdiction as well as their continuous presence in this District. Defendants have committed acts of patent infringement in this District and a substantial part of the events or omissions giving rise to this claim occurred in this District. Defendants have placed and

continue to place, Accused Products in the stream of commerce, through an established channel of distribution, with the knowledge and intent to use and sell products in this District.

8. Defendants are thus subject to this Court's specific and general personal jurisdiction pursuant to their substantial business in this forum, including: (i) committing at least a portion of the infringements alleged herein in this judicial District; (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in this forum state and in this judicial District; and (iii) incorporating in this District. Furthermore, Defendants have been sued in this judicial District before and have not contested personal jurisdiction.

9. Venue is proper in this judicial district pursuant to 28 U.S.C. §1400(b), because LGE is a foreign defendant and subject to suit in any judicial district, and LG USA is incorporated in this district. *See In re HTC Corp.*, 889 F.3d 1349 (Fed. Cir. 2018); *TC Heartland v. Kraft Foods Group Brands LLC*, 137 S. Ct. 1514 (2017).

The Patent-in-Suit

10. On March 29, 2011, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,917,843, entitled "Method, System and Computer Readable Medium for Addressing Handling from a Computer Program." A copy of the '843 Patent is attached as Exhibit 1 to this Complaint. The '843 Patent is valid and enforceable.

11. Arendi is the exclusive owner of all right, title, and interest in the '843 Patent, including the right to bring this suit for patent infringement.

12. The '843 Patent's specification explains the need to retrieve information from a data source external to a document, such as a database. It also observes that information in the database becomes stale and, therefore, "must constantly be updated by the user," which requires

the user to have access to the database and understand how to use and modify the database or else rely on the intervention of an administrator. Ex. 1, '843 Patent, at 1:27-35, 1:43-49. The invention of the '843 Patent obviates the need for the user to be familiar with the database in order to search for, retrieve, and modify information. The Abstract summarizes the invention accordingly:

> A method, system and computer readable medium for providing . . . a function item, such as a key, button, icon, or menu, tied to a user operation in a computer, whereby a single click on the function item in a window or program on a computer screen, or one single selection in a menu in a program, initiates retrieval of name and addresses and/or other person or company related information, while the user works simultaneously in another program, e.g., a word processor.

Ex. 1, at Abstract; *see also id*. at 2:14-23 (similar language used to achieve "objects" of the invention). The Federal Circuit similarly described the '843 Patent as "directed to providing beneficial coordination between a first computer program displaying a document and a second computer program for searching an external information source. The patent allows a user to access and conduct a search using the second computer program while remaining in the first computer program displaying the document." *Arendi S.A.R.L. v. Apple, Inc.*, 832 F. 3d 1355, 1357 (Fed. Cir. 2016). Use of the invention, the specification adds, can be implemented "with a minimal number of user commands." Ex. 1, at 9:51-54. The invention streamlines the process of creating and updating records in the database, allowing such tasks to be performed directly from the document. *See id.* at 9:57-60.

13. The claims of the '843 Patent thus provide non-abstract ideas, unconventional inventive concepts, and reflect a practical application of the invention as described in the specifications. In particular, the '843 Patent has been found by this Court to be directed to an improvement in computer functionality. *See Arendi S.a.r.l. v. LG Electronics, Inc. et al.*, Case No. 12-1595-LPS (January 2, 2020) (D.I. 178).

Count 1

(Direct, Indirect, and Willful Infringement of the '843 Patent)

14. Arendi incorporates by reference the preceding paragraphs.

15. Defendants have directly infringed, literally or under the doctrine of equivalents, at least claims 1, 8, 23, and 30 of the '843 Patent under 35 §§ U.S.C. 271(a) and 271(g) by making, using, selling, offering to sell, and/or importing in or into the United States, mobile telecommunication devices, mobile phones, tablets, and other products practicing at least claims 1, 8, 23, and 30 of the '843 Patent ("the Accused Instrumentalities"). The Accused Instrumentalities include the following products and devices: LG Stylo 4, LG Q7+, LG G7 ThinQ, LG V35 ThinQ, LG V30, LG V30+, LG G Pad, LG K30, LG Stylo 3, LG G6, LG V20, LG Zone 4, LG K30, LG X Venture, LG Grace, LG Fiesta, LG Aristo, LGK20, LG Harmony, LG K20 Plus, LG Stylo 3 Plus, LG K8, LG G6 Plus, LG Stylo 2 Plus, LG X Power, LG K10, LG X Power, LG Rebel 2, LG Tribute HD, LG Phoenix 3, LG Fortune, LG Risio 2, LG K10, LG K3, LG K8, LG G5, LG Escape 3, LG Stylo 2, LG K8 V, LG K7, LG Classic, LG Rebel, LG Treasure, LG Premier, LG G4, LG G Vista 2, LG V10, LG Spree, LG Tribute 2, LG Tribute 5, LG G Stylo, LG Escape 2, LG G Flex 2, LG Leon, LG G Stylo, LG G Flex 2, LG Destiny, LG Power, LG G Stylo, LG G Flex 2, LG Optimus G Pro, LG G3, LG G Vista, LG G3 Vigor, LG Access, LG Optimus Fuel, LG Volt, LG Google Nexus 4, LG Optimus F5, LG Optimus F3Q, LG Optimus G, LG Venice, LG Optimus 7, LG Optimus F7, LG Optimus G Sprint, LG Optimus L9, LG Optimus F7, LG Lucid 2, LG Optimus Select, LG Mach LS860, LG Optimus Regard, LG Motion 4G, LG Spirit 4G, LG Escape, LG Splendor, LG Optimus Exceed, LG Viper, LG Doubleplay, LG Connect 4G, LG Optimus 2, MG Mytouch, LG Optimus Net, LG Optimus Elite, LG Marquee, LG MS690, LG Optimus M+, LG Esteem, LG Nitro HD, LG Optimus Slider, LG Enlighten, LG Lucid 4G, LG

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