

Exhibit J

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Neo Wireless LLC,

Plaintiff,

v.

LG Electronics Inc., and LG Electronics
U.S.A., Inc.,

Defendants.

C.A. NO. 6:21-cv-00025-ADA

JURY TRIAL DEMANDED

PLAINTIFF’S FIRST AMENDED COMPLAINT

Plaintiff Neo Wireless LLC (“Plaintiff” or “Neo Wireless”) files this First Amended Complaint against Defendants LG Electronics Inc. (“LGE”), and LG Electronics U.S.A., Inc. (“LG USA”) (collectively “LG”) for patent infringement under 35 U.S.C. § 271. Plaintiff alleges, based on its own personal knowledge with respect to its own actions and based upon information and belief with respect to all others’ actions, as follows:

THE PARTIES

1. Plaintiff Neo Wireless LLC is a Delaware corporation with its principal place of business located in Wayne, Pennsylvania.

2. On information and belief, Defendant LGE is a corporation organized and existing under the laws of the Republic of Korea with a principal place of business at LG Twin Towers, 128 Yeouidaero, Yeongdungpo-gu, Seoul, South Korea. LGE is the entity that manufactures the LG-branded products sold in the United States, including the Accused Instrumentalities in this case. In addition to making the infringing products, LGE is responsible for research and development, product design, and sourcing of

components.

3. On information and belief, Defendant LG USA is a Delaware corporation registered to do business in Texas and is a direct subsidiary of LGE. LG USA has numerous regular and established places of business in Texas including at least at 9420 Research Blvd, Austin, Texas 78759; 2155 Eagle Parkway, Fort Worth, Texas 76177; and 14901 Beach St, Fort Worth, TX 76177.

4. On information and belief, LG maintains one or more physical fixed places of business in Texas, including offices at 9420 Research Blvd, Austin, Texas 78759, and a representative office at 9600 Great Hills Trail, Suite 150W, Austin, TX 78759.¹

JURISDICTION AND VENUE

5. This action includes a claim of patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.* This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over each of the LG Defendants. As indicated above, LG conducts business and has committed acts of patent infringement and has induced and contributed to acts of patent infringement by others in this District, the State of Texas, and elsewhere in the United States.

7. Each LG Defendant has committed acts of infringement in this judicial District and maintains regular and established places of business in this District, directly or through its subsidiaries, as set forth above. LG has continuous and systematic business contacts with the State of Texas.

¹ <http://m.lgdisplay.com/m/eng/company/locationGlobal?placeLocCode=OVE02>.

8. LG USA, directly or through subsidiaries or intermediaries (including distributors, retailers, contract manufacturers, and others), conducts its business extensively throughout Texas, including by distributing, offering for sale, selling, and advertising (including by the provision of interactive web pages) its products and services in the State of Texas and the Western District of Texas.

9. LG USA employs persons with relevant knowledge of the accused technology in Texas. For example, LG USA recently published a job posting seeking a Production Planning Analyst that is bilingual in Korean and English for Fort Worth, Texas.²

10. LG USA sells its phones to carriers and retailers in Texas placing and continuing to place infringing smartphones and software into the stream of commerce via an established distribution channel with the knowledge and/or intent that those products were sold and continue to be sold in the United States and Texas, including in this District. For example, LG USA has a distribution center in Fort Worth that serves as its single largest distribution point in the United States.³

11. LGE, directly or through subsidiaries or intermediaries (including LG

2

https://www.google.com/search?q=Production+Planning+Analyst+LG+electornics+fort+worth+texas&rlz=1C1GCEA_enUS888US888&oq=Production+Planning+Analyst+LG+electornics+fort+worth+texas&aqs=chrome..69i57j33.5316j0j4&sourceid=chrome&ie=UTF-8&ibp=htl;jobs&sa=X&ved=2ahUKewjgopTlqf3rAhUH7awKHYo_DPQQp4wCMAB6BAGNEAE#fpstate=tldetail&htivrt=jobs&htiq=Production+Planning+Analyst+LG+electornics+fort+worth+texas&htidocid=HduTHXt9Hb8hesJAAAAAA%3D%3D&sxsrf=ALeKk00F0qUQLSvhBxXH7r4F_FvtaueFew:1600797068832

³ <https://www.bizjournals.com/dallas/news/2013/10/23/how-lg-electronics-will-use-12m-sf.html>

USA, distributors, retailers, contract manufacturers, and others), conducts its business extensively throughout Texas, including by shipping, manufacturing, distributing, offering for sale, selling, and advertising (including by the provision of interactive web pages) its products and services in the State of Texas and the Western District of Texas.

12. LGE purposefully and voluntarily places its infringing products into the stream of commerce with the expectation and the knowledge that those products will be purchased and used by consumers in this State and this District.

13. For example, while LGE is a South Korean entity, it operates (in whole or in part) a United-States focused website (www.lg.com/us), including one that advertises the Accused Instrumentalities. LG's US-focused website contains copyright notices in the name of "LG Electronics," and legal terms in the name of LGE specifically. *See* <https://www.lg.com/us/legal>. This demonstrates that LGE knows and intends that its products will reach customers throughout the United States, including in this District, or that LGE, at least reasonably could have foreseen that a termination point of its distribution channel is Texas. This is further demonstrated by the presence, noted *supra* note 3, of LG's single largest US distribution center in this State.

14. Further, on information and belief, LGE controls the activities (catalogued above) within the United States and this District of LG USA, its direct subsidiary. On information and belief, LGE sells its smartphones through a distribution channel it established with LG USA, which includes third-party distributors such as Verizon, Sprint, AT&T, and T-Mobile, with knowledge that the Accused Products will be sold nationwide, including in Texas.

15. Further, assertion of personal jurisdiction over either LG Defendant would not be unfair or unreasonable, particularly given LG's concerted efforts to serve the United States market, including Texas.

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