SEL EXHIBIT NO. 2001

CHI MEI INNOLUX CORP. v. PATENT OF SEMICONDUCTOR ENERGY LABORATORY CO., LTD.

IPR2013-00038

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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 0021 JST (JPRx)

COMPLAINT FOR PATENT INFRINGEMENT

JURY TRIAL DEMANDED

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

PARTIES

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

2. On information and belief, Defendant CMI is a corporation organized under the laws of Taiwan with its principal place of business at No. 160, Kesyue Rd., Jhunan Science Park, Miaoli County 350, Taiwan, R.O.C. On information and belief, CMI is a company established on March18, 2010 as a result of the merger of Innolux Display Corporation with Chi Mei Optoelectronics Corporation ("CMO") and TPO Displays Corporation. CMI manufactures electronic products in Taiwan and directly and/or indirectly imports, sells in and/or offers for sale its products in California and elsewhere in the United States. In addition, CMI provides these products to third parties through an established distribution channel knowing that these third parties will import, sell, offer for sale, and/or use these products in California and elsewhere in the United States using their nationwide contacts and distribution channels.

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

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

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

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

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

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

JURISDICTION

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

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

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

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

VENUE

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

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

PATENTS-IN-SUIT

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

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