

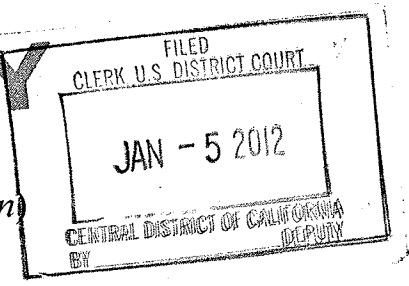
SEL EXHIBIT NO. 2001

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

IPR2013-00038

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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

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