

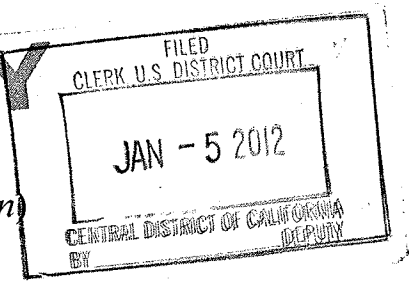
## **SEL EXHIBIT NO. 2001**

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

IPR2013-00064

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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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