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Attorneys for Plaintiff  
UNIVERSAL ELECTRONICS INC.

IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA -- SOUTHERN DIVISION

UNIVERSAL ELECTRONICS INC.,  
  
Plaintiff,  
  
v.  
  
UNIVERSAL REMOTE CONTROL,  
INC.,  
  
Defendant.

Case No. SACV13-00984 JAK (SHx)  
**COMPLAINT FOR PATENT  
INFRINGEMENT**  
  
**JURY TRIAL DEMANDED**



1 Plaintiff Universal Electronics Inc. complains of Defendant Universal  
2 Remote Control, Inc. as follows:

3 NATURE OF CASE

4 1. This is a claim for patent infringement that arises under the patent  
5 laws of the United States, Title 35 of the United States Code. This Court has  
6 original jurisdiction over the subject matter of this claim under 28 U.S.C. §§ 1331  
7 and 1338(a).

8 PARTIES

9 2. Plaintiff Universal Electronics Inc. ("UEI") is a Delaware Corporation  
10 that has a principal place of business at 201 E. Sandpointe Avenue, Santa Ana,  
11 California 92707. UEI has been an industry leader in the design, development and  
12 manufacture of remote control technology for over twenty years. UEI develops  
13 and manufactures a broad line of products, software and technologies that are  
14 marketed to enhance home entertainment systems. Its offerings include universal  
15 remote controls, audio-video accessories and integrated circuits, as well as  
16 software, firmware and technology solutions that can enable devices to wirelessly  
17 connect and interact with home networks and interactive services to deliver digital  
18 entertainment and information. UEI's investments in and commitment to  
19 innovation, research and development have resulted in substantial and valuable  
20 portfolios of intellectual property rights, including patents in the area of remote  
21 controls.

22 3. UEI owns and has standing to sue for infringement of United States  
23 Patent No. 5,228,077 ("the '077 Patent"), entitled "Remotely Upgradable  
24 Universal Remote Control" which issued on July 13, 1993.



1 11. UEI owns and has standing to sue for infringement of United States  
2 Patent No. 7,831,930 B2 (“the ‘930 Patent”), entitled “System and Method for  
3 Displaying a User Interface for a Remote Control Application,” which issued on  
4 November 9, 2010.

5 12. Defendant Universal Remote Control, Inc. (“URC”) is a New York  
6 corporation with its principal place of business at 500 Mamaroneck Avenue, Suite  
7 502, Harrison, New York, 10528.

### 8 JURISDICTION AND VENUE

9 13. URC sells and distributes remote control devices products and other  
10 home automation products. The remote control products relevant to this action  
11 generally include programmable and upgradeable remote control devices and  
12 products including software, hardware and interfaces.

13 14. URC imports these devices and products into the United States from,  
14 among others, a Korean manufacturer, Ohsung Electronics Co., Ltd., and sells  
15 them to residential and commercial customers such as subscription broadcast  
16 providers, dealers, custom installers, retailers, and OEM customers, which, in turn,  
17 resell these products to users throughout the United States, including those in this  
18 judicial district.

19 15. At least through the foregoing activities, URC is doing business in this  
20 judicial district, has purposefully availed itself of the privilege of conducting  
21 business with residents of this judicial district, and has established sufficient  
22 minimum contacts with the State of California such that it should reasonably and  
23 fairly anticipate being brought into court in California.

24 16. Venue is proper in this district under 28 U.S.C. §§ 1391(b)-(d) and  
25 1400(b).

1 **CLAIMS FOR PATENT INFRINGEMENT**

2 **COUNT I**

3 **INFRINGEMENT OF U.S. PATENT NO. 5,228,077**

4 17. UEI re-alleges and incorporates by reference all of its allegations set  
5 forth above in Paragraphs 1 through 16.

6 18. With its knowledge of United States Patent No. 5,228,077 and its  
7 infringement prior to the expiration of the '077 Patent, URC imported into the  
8 United States, and used, offered to sell and sold in the United States, remote  
9 control devices and products that, alone or in combination, infringed the '077  
10 Patent, including, without limitation, those with URC model numbers MX-780,  
11 MX-810, MX-850, MX-880, MX-890, MX-900i, MX-980, MX-1200, MX-3000,  
12 MX-5000, MX-6000, UR4U-MDVR2B, UR4U-MDVR-CHD2, UR5U-6200,  
13 UR5U-6200L, UR5U-8700L, UR5U-8720L, UR5U-8800, UR5U-8800L, UR5U-  
14 8820, UR5U-8820L, and other remote control devices and products with different  
15 model names or numbers, but with substantially the same designs, features and  
16 functionalities, which were imported, used, sold or offered for sale prior to the  
17 expiration of the '077 Patent ("the '077 Patent Accused URC Remotes").

18 19. The '077 Patent Accused URC Remotes are universal remote controls  
19 capable of controlling various devices.

20 20. The '077 Patent Accused URC Remotes are designed to be coupled to  
21 a computer.

22 21. The '077 Patent Accused URC Remotes each have infrared lamp  
23 driver circuitry.

24 22. The '077 Patent Accused URC Remotes each include a connector on  
25 the circuit board for coupling the remote to a computer.

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