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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

COMPLAINT

DWT 22214983v1 0095529-000001

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.

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5 Patent No. 5,111,781 (the '781 Patent'), entitled "Remote Control System,"
6 which issued on May 9, 1995.

7 6. UEI owns and has standing to sue for infringement of United States
8 Patent No. 5,552,917 ("the '917 Patent"), entitled "Remote Control," which issued
9 on September 3, 1996.

10 7. UEI owns and has standing to sue for infringement of United States
11 Reissued Patent No. RE39,059 E ("the '059 Patent"), entitled "Computer
12 Programmable Remote Control," which issued on April 4, 2006 and is a reissue of
13 United States Patent No. 6,211,870, entitled "Computer Programmable Remote
14 Control," which issued on April 3, 2001.

15 8. UEI is the exclusive licensee of and holds all substantial rights and
16 interest to enforce United States Patent No. 6,407,779 B1 ("the '779 Patent"),
17 entitled "Method and Apparatus for an Intuitive Universal Remote Control
18 System," which issued on June 18, 2002.

19 9. UEI owns and has standing to sue for infringement of United States
20 Patent No. 7, 126,468 B2 ("the '468 Patent"), entitled "System and Method for
21 Monitoring Remote Control Transmissions," which issued on October 24, 2006.

22 10. UEI is the exclusive licensee of and holds all substantial rights and
23 interest to enforce United States Patent No. 7,589,642 B1 ("the '642 Patent"),
24 entitled "Relaying Key Code Signals Through A Remote Control Device," which
25 issued on September 15, 2009.

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

JURISDICTION AND VENUE

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

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

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

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

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

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

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

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

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

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