

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

INNOVATIVE DISPLAY
TECHNOLOGIES LLC,

Plaintiff,

v.

AMERICAN HONDA MOTOR CO., INC.;
HONDA OF AMERICA MFG., INC.;
HONDA MANUFACTURING
OF ALABAMA, LLC; and
HONDA MANUFACTURING
OF INDIANA, LLC;

Defendants.

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C.A. No. 2:14-cv-00222

JURY TRIAL DEMANDED

PLAINTIFF'S COMPLAINT

Plaintiff Innovative Display Technologies LLC, by and through its undersigned counsel,
files this Original Complaint for patent infringement against the following Defendants:

American Honda Motor Co., Inc.;
Honda of America Mfg., Inc.;
Honda Manufacturing of Alabama, LLC; and
Honda Manufacturing of Indiana, LLC

(collectively "Honda").

THE PARTIES

1. Plaintiff Innovative Display Technologies LLC ("IDT") is a Texas limited liability company with its principal place of business at 2400 Dallas Parkway, Suite 200, Plano, Texas 75093.

2. Defendant American Honda Motor Co., Inc. (“AHM”) is a California corporation with a place of business at 1919 Torrance Blvd., Torrance, California 90501. AHM is a wholly owned subsidiary of Honda Motor Co., Ltd., a Japanese corporation. On information and belief, AHM is responsible for distribution, marketing and sales of Honda and Acura brand automobiles in the United States.

3. Defendant Honda of America Mfg., Inc. (“HAM”) is an Ohio corporation with a place of business at 24000 Honda Pkwy, Marysville, Ohio 43040. Its parent companies are Honda Motor Co., Ltd. and American Honda Motor Co., Inc.

4. On information and belief, Defendant Honda Manufacturing of Alabama, LLC (“HMA”) is an Alabama limited liability company with a place of business at 1800 Honda Drive, Lincoln, Alabama 35096.

5. On information and belief, Defendant Honda Manufacturing of Indiana, LLC (“HMIN”) is an Indiana limited liability company with a place of business at 2755 N. Michigan Ave., Greensburg, Indiana 47240.

JURISDICTION AND VENUE

6. This action arises under the Patent Laws of the United States, 35 U.S.C. § 271 *et seq.*

7. This Court has subject matter jurisdiction over this case for Patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

8. This Court has personal jurisdiction over Honda. On information and belief, Honda, either directly or through intermediaries, regularly sells products and services into this judicial district and manufactures products intended to be sold and in fact sold into and within this judicial district. Additionally, on information and belief, this Court has personal jurisdiction over Honda because Honda has committed, aided, abetted, contributed to, induced, and/or participated in the commission of acts within this judicial district giving rise to this action.

9. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and 1400 (b).

PATENTS IN SUIT

10. U.S. Patent No. 6,755,547 titled “Light Emitting Panel Assemblies” (“the ’547 Patent”) was duly and legally issued by the U.S. Patent and Trademark Office on June 29, 2004, after full and fair examination. Jeffery R. Parker is the named inventor of the ’547 Patent. IDT owns the ’547 Patent and holds the right to sue and recover damages for infringement thereof.

11. U.S. Patent No. 7,300,194 titled “Light Emitting Panel Assemblies” (“the ’194 Patent”) was duly and legally issued by the U.S. Patent and Trademark Office on November 27, 2007, after full and fair examination. Jeffery R. Parker is the named inventor of the ’194 Patent. IDT owns the ’194 Patent and holds the right to sue and recover damages for infringement thereof.

12. U.S. Patent No. 7,384,177 titled “Light Emitting Panel Assemblies” (“the ’177 Patent”) was duly and legally issued by the U.S. Patent and Trademark Office on June 10, 2008, after full and fair examination. Jeffery R. Parker is the named inventor of the ’177 Patent. IDT owns the ’177 Patent and holds the right to sue and recover damages for infringement thereof.

13. U.S. Patent No. 8,215,816 titled “Light Emitting Panel Assemblies” (“the ’816 Patent”) was duly and legally issued by the U.S. Patent and Trademark Office on July 10, 2012, after full and fair examination. Jeffery R. Parker is the named inventor of the ’816 Patent. IDT owns the ’816 Patent and holds the right to sue and recover damages for infringement thereof.

14. U.S. Patent No. 6,508,563 titled “Light Emitting Panel Assemblies for Use in Automotive Applications and the Like” (“the ’563 Patent”) was duly and legally issued by the U.S. Patent and Trademark Office on January 21, 2003, after full and fair examination. Jeffery R. Parker, Mark D. Miller and Thomas A. Hough are the named inventors of the ’563 Patent. IDT owns the ’563 Patent and holds the right to sue and recover damages for infringement thereof.

15. U.S. Patent No. 6,886,956 titled “Light Emitting Panel Assemblies for Use in Automotive Applications and the Like” (“the ’956 Patent”) was duly and legally issued by the U.S. Patent and Trademark Office on May 3, 2005, after full and fair examination. Jeffery R. Parker, Mark D. Miller and Thomas A. Hough are the named inventors of the ’956 Patent. IDT owns the ’956 Patent and holds the right to sue and recover damages for infringement thereof.

COUNT 1: Infringement of U.S. Patent No. 6,755,547

16. Plaintiff repeats and re-alleges each and every allegation of paragraphs 1-15 as though fully set forth herein.

17. On information and belief, Honda has been and now is directly infringing, and/or inducing infringement by others, and/or contributing to the infringement by others of the '547 Patent in the state of Texas, in this judicial district, and elsewhere within the United States by, among other things, making, using, offering for sale, selling, or importing vehicles (including but not limited to various model years of Honda's Civic Si model) having displays, (including but not limited to the 39541-TS8-A61 navigation/entertainment display) that infringe one or more claims of the '547 Patent, all to the injury of IDT. Honda is thus liable for infringement of the '547 Patent pursuant to 35 U.S.C. § 271.

18. As a result of Honda's infringement of the '547 Patent, Honda has damaged IDT. Honda is liable to IDT in an amount to be determined at trial that adequately compensates IDT for the infringement, which by law can be no less than a reasonable royalty.

19. IDT intends to seek discovery on the issue of willfulness and reserves the right to seek a willfulness finding relative to pre-suit infringement and/or post-suit infringement of the '547 Patent.

20. As a result of Honda's infringement of the '547 Patent, IDT has suffered and will continue to suffer loss and injury unless Honda is enjoined by this Court.

21. At least as early as its receipt of this Complaint, Honda has had knowledge of the '547 Patent and written notice of the infringement.

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