

THE PARTIES

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

2. Defendant Toyota Motor Corporation is a corporation existing under the laws of Japan with its principal place of business at 1 Toyota-cha, Toyota City, Aichi Prefecture 471-8571, Japan.

3. Defendant Toyota Motor Sales U.S.A., Inc. (“TMS”) is a California corporation with its principal place of business at 19001 S. Western Avenue, Torrance, California 90501. TMS is responsible for U.S. sales, marketing and distribution for Toyota Motor Corporation, which is TMS’s corporate parent.

4. Defendant Toyota Motor Manufacturing, Kentucky, Inc. (“TMMK”) is a Kentucky corporation with its principal place of business at in 1001 Cherry Blossom Way, Georgetown, Kentucky 40324. TMMK’s corporate parent is Toyota Motor Corporation.

5. Defendant Toyota Motor Manufacturing, Indiana, Inc. (“TMMI”) is an Indiana corporation with its principal place of business at 4000 Tulip Tree Drive, Princeton, Indiana 47670. TMMI’s corporate parent is Toyota Motor Corporation.

6. Defendant Toyota Motor Manufacturing, Texas, Inc. (“TMMTX”) is a Texas corporation with its principal place of business at One Lone Star Pass, San Antonio, Texas 78264. TMMTX’s corporate parent is Toyota Motor Corporation.

7. Defendant Toyota Motor Manufacturing, Mississippi, Inc. (“TMMMS”) is a Mississippi corporation with its principal place of business at 1200 Magnolia Way, Blue Springs, Mississippi 38828. TMMMS’s corporate parent is Toyota Motor Corporation.

8. Defendant Subaru of Indiana Automotive, Inc. (“SIA”) is an Indiana corporation with its principal place of business at 5500 State Rd. 38 East, Lafayette, Indiana 47903. SIA manufactures Toyota and Subaru automobiles.

9. Defendant Gulf States Toyota, Inc. (“Gulf States”) is a Texas corporation with its principal place of business at 1375 Enclave Parkway, Houston, Texas 77077. Gulf States is a distributor of Toyota automobiles.

JURISDICTION AND VENUE

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

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

12. This Court has personal jurisdiction over Toyota. On information and belief, Toyota, 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 Toyota because Toyota has committed, aided, abetted, contributed to, induced, and/or participated in the commission of acts within this judicial district giving rise to this action.

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

PATENTS IN SUIT

14. 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 & 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.

15. 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 & 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.

16. 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 & 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.

17. U.S. Patent No. 7,404,660 titled “Light Emitting Panel Assemblies” (“the ’660 Patent”) was duly and legally issued by the U.S. Patent & Trademark Office on July 29, 2008, after full and fair examination. Jeffery R. Parker is the named inventor of the ’660 Patent. IDT owns the ’660 Patent and holds the right to sue and recover damages for infringement thereof.

18. U.S. Patent No. 7,434,974 titled “Light Emitting Panel Assemblies” (“the ’974 Patent”) was duly and legally issued by the U.S. Patent & Trademark Office on October 14, 2008, after full and fair examination. Jeffery R. Parker is the named inventor of the ’974 Patent. IDT owns the ’974 Patent and holds the right to sue and recover damages for infringement thereof.

19. 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 & 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.

20. 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 & 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.

21. 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 & 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.

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