



Tech owns all title, rights and interest to United States Patent No. 7,202,843 (the “‘843 Patent”) and United States Patent No. 7,420,550 (the “‘550 Patent”).

2. Upon information and belief, Defendant Sharp Corporation is a Japanese corporation having its principal place of business at 22-22 Nagaike-cho, Abeno-ku, Osaka 545-8522, Japan. Sharp Corporation may be served with process under the Delaware long arm statute, 10 *Del. C.* § 3104.

3. Upon information and belief, Defendant Sharp Electronics Corporation is a New York corporation having its principal place of business at 1 Sharp Plaza, Mahwah, New Jersey 07495-1163. Defendant Sharp Electronics Corporation can be served via its registered agent, C T Corporation System, 111 Eighth Avenue, New York, NY 10011.

4. Upon information and belief, Defendant Sharp Electronics Manufacturing Company of America, Inc. is a California corporation having its principal place of business at 1 Sharp Plaza, Mahwah, New Jersey 07495-1163. Defendant Sharp Electronics Manufacturing Company of America, Inc. can be served via its registered agent, C T Corporation System, 818 W. Seventh Street, Los Angeles, CA 90017.

5. Upon information and belief, Defendant Samsung Electronics Co., Ltd. is a Korean corporation having its principal place of business at San #24 Nongseo-dong, Giheung-gu, Yongin-City, Gyeonggi-do, Korea 446-711. Samsung Electronics Co., Ltd. may be served with process under the Delaware long arm statute, 10 *Del. C.* § 3104.

6. Upon information and belief, Defendant Samsung Electronics America, Inc. is a New York corporation having its principal place of business at 85 Challenger Road, Ridgefield Park, New Jersey 07660. Defendant Samsung Electronics America, Inc. can be

served via its registered agent, C T Corporation System, 111 Eighth Avenue, New York, NY 10011.

7. Upon information and belief, Defendant Sony Corporation is a Japanese corporation having its principal place of business at 1-7-1, Konan, Minato-ku, Tokyo 108-0075, Japan. Sony Corporation may be served with process under the Delaware long arm statute, 10 *Del. C.* § 3104.

8. Upon information and belief, Defendant Sony Electronics Inc. is a Delaware corporation having its principal place of business at 16530 Via Esprillo, San Diego, California 92127. Defendant Sony Electronics, Inc. can be served via its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808.

9. Upon information and belief, Defendant Sony Corporation of America is a New York corporation having its principal place of business at 550 Madison Ave., 27<sup>th</sup> Floor, New York, New York 10022. Defendant Sony Corporation of America can be served via its registered agent, Corporation Service Company, 80 State Street, Albany, NY 12207.

### **JURISDICTION AND VENUE**

10. This is an action for patent infringement arising under the patent laws of the United States of America, Title 35 of the United States Code. This Court has subject matter jurisdiction over the matters plead herein under 28 U.S.C. §§ 1331 and 1338(a) in that this is a civil action arising out of the patent laws of the United States of America.

11. Samsung Electronics, Sony and Sharp (collectively, “Defendants”) regularly and deliberately engaged in and continue to engage in activities that result in using, selling, offering for sale, and/or importing infringing products in and/or into the State of Delaware and this judicial district. These activities violate Surpass Tech’s rights under the ’843 and

'550 Patents plead herein. This Court has personal jurisdiction over the Defendants because, among other things, Defendants conduct business in the State of Delaware and in this judicial district and thus enjoy the privileges and protections of Delaware law.

12. Venue is proper in the District of Delaware pursuant to 28 U.S.C. §§ 1391(b), (c) and (d) and 1400(b).

**COUNT I**  
**INFRINGEMENT OF U.S. PATENT NO. 7,202,843**  
**(Against Sharp, Samsung Electronics and Sony)**

13. Plaintiff incorporates Paragraphs 1 through 12 herein by reference as if fully stated herein.

14. The '843 Patent, entitled "Driving Circuit of A Liquid Crystal Display Panel and Related Driving Method," issued on April 10, 2007. The '843 Patent names Yung-Hung Shen, Shih-Chung Wang, Yuh-Ren Shen and Cheng-Jung Chen as inventors. Surpass Tech owns by assignment the entire right, title and interest in and to the '843 Patent, including the sole right to sue for past and present patent infringement thereof. A true and correct copy of the '843 Patent is attached hereto as Exhibit A.

15. Several of Samsung Electronics', Sony's and Sharp's products, including but not limited to Samsung Electronics' UN60ES8000F television having Sharp's LK600D3Lxxx liquid crystal display ("LCD") module, Sony's KDL-40NX800 television having Sharp's LK400D3LA8S LCD module, and Sharp's LC-70LE735U television having Sharp's LK695D3GW20R LCD module practice claims of the '843 Patent. Surpass Tech believes, and further alleges, that additional Sharp LCD modules, Samsung Electronics televisions having Sharp LCD modules, Sony televisions having Sharp LCD modules, and Sharp televisions having Sharp LCD modules also practice one or more claims of the '843

Patent (products covered by this paragraph are collectively referred to as “Accused ’843 Products”).

16. Surpass Tech believes, and thereon alleges, that Sharp has sold and offered to sell and is selling and offering to sell infringing LCD modules for use in infringing televisions, and that these LCD modules are material to practicing the ’843 Patent’s invention, have no substantial non-infringing uses, and are known by Defendants to be especially made or especially adapted for use in what constitutes infringement of the ’843 Patent. At least as early as February 25, 2014, Sharp had actual knowledge of the ’843 Patent and Plaintiff’s claims that Sharp’s LCD modules are covered by the ’843 Patent. Sharp is contributing to the acts of using, offering to sell, and/or selling in the United States and/or importing into the United States the infringing Accused ’843 Products by Defendants by intentionally supplying such material components to Defendants with such knowledge of the ’843 Patent.

17. Surpass Tech believes, and thereon alleges, that Sharp has induced and is inducing the infringement of the ’843 Patent by Defendants with the knowledge that the induced acts constitute patent infringement, by providing modules which contain every element of claims of the ’843 Patent. At least as early as February 25, 2014, Sharp had actual knowledge of the ’843 Patent and Plaintiff’s claims that Sharp’s LCD modules are covered by the ’843 Patent. Sharp is continuing to induce infringement by Defendants by intentionally inducing acts of using, offering to sell, and/or selling in the United States and/or importing into the United States the Accused ’843 Products with such knowledge of the ’843 Patent.

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