

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DELAWARE DISPLAY GROUP LLC §
and INNOVATIVE DISPLAY §
TECHNOLOGIES LLC, §

C.A. No. ____

Plaintiffs,

JURY TRIAL DEMANDED

v.

LENOVO GROUP LTD., §

LENOVO HOLDING CO., INC., and §

LENOVO (UNITED STATES) INC., §

Defendants. §

PLAINTIFFS’ COMPLAINT

Delaware Display Group LLC and Innovative Display Technologies LLC (collectively, “Plaintiffs”) by and through their undersigned counsel, file this Complaint against Lenovo Group Ltd.; Lenovo Holding Co., Inc.; and Lenovo (United States) Inc. (collectively, “Lenovo”).

THE PARTIES

1. Delaware Display Group LLC (“DDG”) is a Delaware limited liability company with its principal place of business located at 2400 Dallas Parkway, Suite 200, Plano, Texas 75093.
2. Innovative Display Technologies LLC (“IDT”) is a Texas limited liability company with its principal place of business located at 2400 Dallas Parkway, Suite 200, Plano, Texas 75093.
3. Upon information and belief, Lenovo Group Ltd. (“LGL”) is a private company incorporated in Hong Kong and has its principal place of business at 23rd floor, Lincoln House, Taikoo Place, 979 King’s Road, Quarry Bay, Hong Kong. Upon information and belief, LGL



may be served with process in Hong Kong pursuant to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.

4. Upon information and belief, Lenovo Holding Co., Inc. (“Lenovo Holding”) is a Delaware Corporation with offices at 1009 Think Place, Morrisville, North Carolina 27560. Upon information and belief, Lenovo Holding may be served with process by serving its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Wilmington, Delaware 19801. Upon information and belief, Lenovo Holding is a subsidiary of LGL.

5. Upon information and belief, Lenovo (United States) Inc. (“Lenovo U.S.”) is a Delaware Corporation with offices at 1009 Think Place, Morrisville, North Carolina 27560. Upon information and belief, Lenovo U.S. may be served with process by serving its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Wilmington, Delaware 19801. Upon information and belief, Lenovo U.S. is a subsidiary of Lenovo Holding.

6. Upon information and belief, Lenovo has conducted and regularly conducts business within this District, has purposefully availed itself of the privileges of conducting business in this District, and has sought protection and benefit from the laws of the State of Delaware.

JURISDICTION AND VENUE

7. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*, including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This Court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

8. As further detailed herein, this Court has personal jurisdiction over Lenovo. Lenovo is amenable to service of summons for this action. Furthermore, personal jurisdiction

over Lenovo in this action comports with due process. Lenovo has conducted and regularly conducts business within the United States and this District. Lenovo has purposefully availed itself of the privileges of conducting business in the United States and, more specifically, in this District. Lenovo has sought protection and benefit from the laws of the State of Delaware by incorporating in the state of Delaware, incorporating a subsidiary in the State of Delaware, and/or by placing infringing products into the stream of commerce through an established distribution channel with the expectation and/or knowledge that they will be purchased by consumers in this District. Plaintiffs' causes of action arise directly from Lenovo's business contacts and other activities in this District.

9. Lenovo – directly or through intermediaries (including distributors, retailers, and others), subsidiaries, alter egos, and/or agents – ships, distributes, offers for sale, and/or sells its products in the United States and this District. Lenovo has purposefully and voluntarily placed one or more of its infringing products, as described below, into the stream of commerce with the expectation and/or knowledge that they will be purchased by consumers in this District. Lenovo knowingly and purposefully ships infringing products into and within this District through an established distribution channel. These infringing products have been and continue to be purchased by consumers in this District. Upon information and belief, Lenovo has committed the tort of patent infringement in this District and/or has induced others to commit patent infringement in this District.

10. Venue is proper in this Court under 28 U.S.C. §§ 1391(b), (c), and (d), as well as 28 U.S.C. § 1400(b), in that Lenovo is subject to personal jurisdiction in this District, and therefore is deemed to reside in this District for purposes of venue, and, upon information and belief, Lenovo has committed acts within this judicial District giving rise to this action and does

business in this District, including but not limited to making sales in this District, providing service and support to their respective customers in this District, and/or operating an interactive website that is available to persons in this District, which website advertises, markets, and/or offers for sale infringing products.

BACKGROUND

A. The Patents-In-Suit.

11. 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 sole inventor listed on the ’547 patent. A true and correct copy of the ’547 patent is attached as **Exhibit A** and made a part hereof.

12. 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 sole inventor listed on the ’194 patent. A true and correct copy of the ’194 patent is attached as **Exhibit B** and made a part hereof.

13. 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 sole inventor listed on the ’177 patent. A true and correct copy of the ’177 patent is attached as **Exhibit C** and made a part hereof.

14. 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 and Trademark Office on July 29, 2008, after full and fair examination. Jeffery R. Parker is the sole inventor listed on the ’660 patent. A true and correct copy of the ’660 patent is attached as **Exhibit D** and made a part hereof.

15. U.S. Patent No. 7,434,973 titled “Light Emitting Panel Assemblies” (“the ’973 patent”) was duly and legally issued by the U.S. Patent and Trademark Office on October 14, 2008, after full and fair examination. Jeffery R. Parker, Gregory A. Coghlan, and Robert M. Ezell are the inventors listed on the ’973 patent. A true and correct copy of the ’973 patent is attached as **Exhibit E** and made a part hereof.

16. 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 and Trademark Office on October 14, 2008, after full and fair examination. Jeffery R. Parker is the sole inventor listed on the ’974 patent. A true and correct copy of the ’974 patent is attached as **Exhibit F** and made a part hereof.

17. U.S. Patent No. 7,537,370 titled “Light Emitting Panel Assemblies” (“the ’370 patent”) was duly and legally issued by the U.S. Patent and Trademark Office on May 26, 2009, after full and fair examination. Jeffery R. Parker is the sole inventor listed on the ’370 patent. A true and correct copy of the ’370 patent is attached as **Exhibit G** and made a part hereof.

18. U.S. Patent No. 7,914,196 titled “Light Redirecting Film Systems Having Pattern of Variable Optical Elements” (“the ’196 patent”) was duly and legally issued by the U.S. Patent and Trademark Office on March 29, 2011, after full and fair examination. Jeffery R. Parker, Timothy A. McCollum, and Robert M. Ezell are the inventors listed on the ’196 patent. A true and correct copy of the ’196 patent is attached as **Exhibit H** and made a part hereof.

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 and Trademark Office on July 10, 2012, after full and fair examination. Jeffery R. Parker is the sole inventor listed on the ’816 patent. A true and correct copy of the ’816 patent is attached as **Exhibit I** and made a part hereof.

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