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14 Attorneys for Plaintiff, Johnson Safety, Inc.

15 **UNITED STATES DISTRICT COURT**  
16 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

17 JOHNSON SAFETY, INC., )  
18 )  
Plaintiff, )  
19 )  
vs. )  
20 )  
21 VOXX INTERNATIONAL )  
CORPORATION, )  
22 VOXX ELECTRONICS )  
CORPORATION, and )  
23 INVISON AUTOMOTIVE SYSTEMS )  
INC., )  
24 )  
Defendants. )  
25 \_\_\_\_\_ )

**CASE NO.** \_\_\_\_\_  
**COMPLAINT FOR PATENT  
INFRINGEMENT**  
**35 U.S.C. § 271**  
**Jury Trial Demanded**

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27  
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1 Plaintiff Johnson Safety, Inc., for its Complaint against Defendants Voxx  
2 International Corporation, Voxx Electronics Corporation, and Invision Automotive  
3 Systems Inc., alleges as follows:

4  
5 **THE PARTIES**

6 1. Plaintiff Johnson Safety, Inc., (hereinafter “Johnson Safety” or  
7 “Plaintiff”) is a California Corporation with its corporate headquarters and  
8 principal place of business at 1425 Cooley Ct., San Bernardino, CA 92408.

9 2. Upon information and belief, Voxx International Corporation,  
10 previously known as Audiovox Corporation (hereinafter “Voxx” or “Audiovox”),  
11 is a corporation organized and existing under the laws of the State of Delaware,  
12 with its principal place of business at 180 Marcus Blvd., Hauppauge, NY 11788.  
13 Voxx is also a registered corporation with the California Secretary of State and  
14 may be served with process by serving its California registered agent: Corporation  
15 Service Company, 2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA 95833.

16 3. Upon information and belief, Voxx Electronics Corporation,  
17 previously known as Audiovox Electronics Corporation (hereinafter “VEC” or  
18 “AEC”) is a wholly-owned subsidiary of Defendant Voxx International  
19 Corporation, and is a corporation organized and existing under the laws of the  
20 State of Delaware, with its principal place of business at 150 Marcus Blvd.,  
21 Hauppauge, NY 11788. VEC is also a registered corporation with the California  
22 Secretary of State and may be served with process through its California registered  
23 agent: Corporation Service Company, doing business as CSC - Lawyers  
24 Incorporating Service, 2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA  
25 95833.

26 4. Upon information and belief, Invision Automotive Systems Inc.  
27 (hereinafter “Invision”) is a wholly-owned subsidiary of Defendant Voxx  
28 International Corporation, and is a Delaware corporation, with its principal place

1 of business at 150 Marcus Blvd., Hauppauge, NY 11788. Invision is also a  
2 registered corporation with the California Secretary of State and may be served  
3 with process by serving its California registered agent: Corporation Service  
4 Company, doing business as CSC - Lawyers Incorporating Service, 2710 Gateway  
5 Oaks Dr., Suite 150N, Sacramento, CA 95833.

6 5. Upon information and belief, Voxx, VEC and Invision, by virtue of  
7 their corporate relationship with one another (e.g., the parent-subsi-dary-affiliate  
8 relationship, as well as from a corporate governance perspective), each shared the  
9 same knowledge with respect to the patents-in-suit. Examples of this include,  
10 Thomas C. Malone who serves (or has served) as the President of Voxx  
11 Electronics Corp., the Senior Vice President of Sales of Voxx International  
12 Corporation, the President of Audiovox Electronics Corporation, a subsidiary of  
13 Voxx International Corporation, the President of Invision Automotive Systems,  
14 Inc., as well as other roles in various Voxx related entities, including Audiovox  
15 Advanced Accessories Group LLC and Audiovox Atlanta Corp. In addition to Mr.  
16 Malone, there are other individuals that serve (or have served) as officers or other  
17 roles in multiple Voxx related entities, including at least Ms. Loriann Shelton and  
18 Mr. Charles M. Stoehr.

19 6. Throughout this pleading, and unless specifically noted otherwise,  
20 Defendants Voxx, VEC, and Invision will be referenced collectively as the  
21 “Defendants” and individually as the “Defendant.” The terms “Defendants” or  
22 “Defendant”, as well as a reference to a specific Defendant, also includes those  
23 employees, agents, and all other persons or entities that the Defendant(s) direct  
24 and/or control.

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**THE PATENTS**

**U.S. Patent No. 6,871,356**

7. On March 22, 2005, United States Patent No. 6,871,356, entitled “Mobile Video System” (the “‘356 patent”), was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). A true and correct copy of the ‘356 patent is attached as Exhibit “A.”

8. Pursuant to 35 U.S.C. § 282, the ‘356 patent is presumed valid.

9. The ‘356 patent was the subject of an *Inter Partes* Reexamination (Ser. No. 95/000,103), requested on August 1, 2005. Audiovox Corporation requested the reexamination and was a real party in interest to that reexamination. The USPTO confirmed the patentability of all claims of the ‘356 patent as originally issued. A copy of the reexamination certificate is included within Exhibit “A.”

10. Defendants, by virtue of their corporate relationship to one another, are thus estopped from asserting the invalidity of all claims in the ‘356 patent on any ground which was raised or could have been raised during the *inter partes* reexamination proceedings per 35 U.S.C. § 315(c) (2006). At a minimum, at least one of the Defendants, Voxx International Corporation, formerly known as Audiovox Corporation, is estopped from asserting the invalidity of all claims in the ‘356 patent on any ground it raised or could have raised during the *inter partes* reexamination proceedings per 35 U.S.C. § 315(c) (2006).

**U.S. Patent No. 7,267,402**

11. On September 11, 2007, United States Patent No. 7,267,402, entitled “Headrest-Mounted Monitor” (the “‘402 patent”) was duly and legally issued by the USPTO. A true and correct copy of the ‘402 patent is attached as Exhibit “B.”

12. Pursuant to 35 U.S.C. § 282, the ‘402 patent is presumed valid.

1 **U.S. Patent No. 7,379,125**

2 13. On May 27, 2008, United States Patent No. 7,379,125, entitled “Flat  
3 Thin Screen TV/Monitor Automotive Roof Mount” (the “‘125 patent”) was duly  
4 and legally issued by the USPTO. A true and correct copy of the ‘125 patent is  
5 attached as Exhibit “C.”

6 14. Pursuant to 35 U.S.C. § 282, the ‘125 patent is presumed valid.  
7

8 **U.S. Patent No. 7,448,679**

9 15. On November 11, 2008, United States Patent No. 7,448,679, entitled  
10 “Headrest-Mounted Monitor” (the “‘679 patent”) was duly and legally issued by  
11 the USPTO. A true and correct copy of the ‘679 patent is attached as Exhibit “D.”

12 16. Pursuant to 35 U.S.C. § 282, the ‘679 patent is presumed valid.  
13

14 **U.S. Patent No. 7,894,003**

15 17. On February 22, 2011, United States Patent No. 7,894,003, entitled  
16 “Flat Thin Screen TV/Monitor Automotive Roof Mount” (the “‘003 patent”) was  
17 duly and legally issued by the USPTO. A true and correct copy of the ‘003 patent  
18 is attached as Exhibit “E.”

19 18. Pursuant to 35 U.S.C. § 282, the ‘003 patent is presumed valid.  
20

21 **The Patents-In-Suit**

22 19. The ‘356 patent, ‘402 patent, ‘125 patent, ‘679 patent, and ‘003 patent  
23 are collectively referred to as “the Patents-in-Suit”.

24 20. Johnson Safety is the assignee of the Patents-in-Suit and has all  
25 rights, title, and interest in and to each of the Patents-in-Suit, including all  
26 substantial rights in and to the Patents-in-Suit, and including the right to sue and  
27 collect damages for past, present, and future infringement.

28 21. Johnson Safety designs, manufactures and sells mobile entertainment  
systems that include in-vehicle headrest-mounted video systems and overhead

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