

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNILOC USA, INC. and	§	
UNILOC LUXEMBOURG, S.A.,	§	Civil Action No.
	§	
Plaintiffs,	§	
	§	
v.	§	PATENT CASE
	§	
LG ELECTRONICS U.S.A., INC.,	§	
LG ELECTRONICS MOBILECOMM	§	
U.S.A. INC. AND	§	
LG ELECTRONICS, INC.,	§	
Defendants.	§	JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs, Uniloc USA, Inc. (“Uniloc USA”) and Uniloc Luxembourg, S.A. (“Uniloc Luxembourg”) (together, “Uniloc”), for their complaint against defendants LG Electronics U.S.A., Inc. (“LGE USA”), LG Electronics Mobilecomm U.S.A., Inc. (“LGE Mobilecomm”), and LG Electronics, Inc., (“LG Korea”) (collectively, “LG”), allege as follows:

THE PARTIES

1. Uniloc USA is a Texas corporation having a principal place of business at Legacy Town Center I, Suite 380, 7160 Dallas Parkway, Plano Texas 75024. Uniloc USA also maintains a place of business at 102 N. College, Suite 603, Tyler, Texas 75702.

2. Uniloc Luxembourg is a Luxembourg public limited liability company having a principal place of business at 15, Rue Edward Steichen, 4th Floor, L-2540, Luxembourg (R.C.S. Luxembourg B159161).

3. LGE USA is a Delaware corporation having a regular and established place of business at 2151-2155 Eagle Parkway, Fort Worth, Texas 76177. LGE USA offers its products and/or services, including those accused herein of infringement, to customers and potential customers located in Texas and in the judicial Northern District of Texas. LGE USA may be served with process through its registered agent for service in Texas: United States Corporation Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

4. LGE Mobilecomm is a California corporation having a regular and established place of business in San Diego, California. LGE Mobilecomm offers its products and/or services, including those accused herein of infringement, to customers and potential customers located in Texas and in the judicial Northern District of Texas.

5. LG Korea is a corporation organized under the laws of Korea with a principal place of business at LG Twin Tower 128, Yeoui-daero, Yeongdeungpo-gu, Seoul, Korea. LG Korea is in the business of manufacturing and selling electronic goods, including cellular telephones, tablets, laptops and televisions.

JURISDICTION

6. Uniloc brings this action for patent infringement under the patent laws of the United States, 35 U.S.C. § 271, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331, and 1338(a).

COUNT I

(INFRINGEMENT OF U.S. PATENT NO. 6,993,049)

7. Uniloc incorporates paragraphs 1-6 above by reference.

8. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 6,993,049 (“the ’049 Patent”), entitled COMMUNICATION SYSTEM, which issued on January 31, 2006.

A copy of the ’049 Patent is attached as Exhibit A.

9. Uniloc USA is the exclusive licensee of the '049 Patent, with ownership of all substantial rights, including the right to grant sublicenses, to exclude others, and to enforce and recover past damages for infringement.

10. The '049 Patent describes in detail and claims in various ways inventions in systems and devices developed by Koninklijke Philips Electronics N.V. for improved communication of data there between using polling of secondary devices by a primary device.

11. The '049 Patent describes problems and shortcomings in the then-existing field of communications between devices and describes and claims novel and inventive technological improvements and solutions to such problems and shortcomings. The technological improvements and solutions described and claimed in the '049 Patent were not conventional or generic at the time of their respective inventions but involved novel and non-obvious approaches to the problems and shortcomings prevalent in the art at the time.

12. The inventions claimed in the '049 Patent involve and cover more than just the performance of well-understood, routine and/or conventional activities known to the industry prior to the invention of such novel and non-obvious systems and devices by the '049 Patent inventor.

13. The inventions claimed in the '049 Patent represent technological solutions to technological problems. The written description of the '049 Patent describes in technical detail each of the limitations of the claims, allowing a person of ordinary skill in the art to understand what the limitations cover and how the non-conventional and non-generic combination of claim elements differ markedly from and improved upon what may have been considered conventional or generic.

14. LG imports, uses, offers for sale, and sells in the United States electronic devices that utilize Bluetooth Low Energy version 4.0 and above. Such devices include: LG V30, LG V30+, LG Aristo 2, LG Tribute Dynasty, LG X charge, LG Q6, LG G6+, LG G6, LG Rebel 3, LG Fiesta 2, LG V20, LG Wine, LG X venture, LG Stylo 3, LG Stylo 3 Plus Titan, LG Stylo 3 Plus, LG Tribute HD, LG Rebel 2, LG Fiesta, LG K20 plus, LG Grace, LG K3, LG Stylo, LG phoenix 3, LG Risio 2, LG K8, LG Stylo 2 V, LG K20, LG K20 V, LG Exalt, LG Aristo, LG G5, LG Stylo 2, LG Fortune, LG X power, LG K10, LG G Vista, LG Escape 3, LG Stylo 2 Plus, LG Classic, LG Rebel, LG Treasure, LG X style, LG Premier, LG K7, LG G4, LG K4, LG Optimus Zone 3, LG K8 V, LG Phoenix 2, LG Tribute 5, LG V10, Tribute 5, Nexus 5X, LG Spree, LG G Vista 2, LG Leon, LG Escape 2, LG Sunrise L15G, LG Lucky, G Flex 2, LG Destiny, LG Sunset, LG Power, LG Access, G Flex, LG Volt 2, LG G Stylo, LG Lancet, LG Tribute 2, LG Logos, LG Transpyre, LG Optimus F60, LG G3, LG Ultimate 2, LG Tribute, LG G3 Vigor, LG Realm, LG Optimus L70, LG F90, LG Volt, LG Optimus Fuel, LG Lucid 3, LG Optimus L90, LG Optimus Zone 2, LG Optimus F3Q, LG F7, LG Nexus 5, LG G2, LG Optimus F6, LG Enact, LG Optimus Quest, LG Optimus F3, LG Optimus F7, LG Optimus F5, Optimus G Pro, Lucid 2, LG Nexus 4, LG Optimus REGARD, LG Mach, LG Optimus G, LG Escape, LG Spectrum 2, LG Intuition, LG Motion 4G, LG laptops such as , LG-13Z980-A.AAS5U1, 13Z980-A.AAS7U1, 13Z980-U.AAW5U1, 14Z980-A.AAS7U1, 14Z980-U.AAW5U1, 15Z980-U.AAS5U1, 15Z980-A.AAS7U1, 15Z980-A.AAS8U1, 15Z980-R.AAS9U1, 13Z970-A.AAS5U1, 13Z970-U.AAW5U1, 14Z970-A.AAS5U1, 14Z970-A.AAS7U1, 15Z970-A.AAS7U1, 15Z970-U.AAS5U1, 15Z975-A.AAS7U1, 13Z975-A.AAS7U1, 15Z975-A.AAS5U1, LG wireless speakers such as , 4.1 ch Sound Bar Surround System with Wireless Surround Sound Speakers, 2.1 ch High Resolution Audio Sound Bar, 7.1ch 700W Wi-Fi

Streaming Array Sound Bar with Wireless Subwoofer, NP8540 Music Flow H5 Wireless Speaker, NP8340 Music Flow H3 Wireless Speaker, NP7550 20W 2.0ch P7 Music Flow Portable Speaker, LAS851M 4.1ch 320W Music Flow Wi-Fi Streaming Sound Bar with Wireless Subwoofer, LAS751M 4.1ch 360W Music Flow Wi-Fi Streaming Sound Bar with Wireless Subwoofer, NP8740 Music Flow H7 Wi-Fi Streaming Speaker, NP5550B Music Flow P5 Portable Bluetooth Speaker, LAS855M 4.1ch 360W Music Flow Wireless Curved Sound Bar with Wireless Subwoofer, NP8350B Music Flow H4 Wi-Fi Streaming Portable Speaker, SoloG Portable Bluetooth Speaker, ZeroG Levitating Portable Bluetooth Speaker with Subwoofer, LOUDR Portable Hi-Fi Speaker System with Bluetooth Connectivity, NP7550 20W 2.0ch P7 Music Flow Portable Speaker, PBS-C510 LG Sound360 Bluetooth® Speaker, NP5550B Music Flow P5 Portable Bluetooth Speaker, NP8350B Music Flow H4 Wi-Fi Streaming Portable Speaker, SJ4R 4.1 ch Sound Bar Surround System with Wireless Surround Sound Speakers, LAS475B 2.1ch 300W Sound Bar with Wireless Subwoofer and Bluetooth® Connectivity, SJ9 5.1.2 ch High Resolution Audio Sound Bar with Dolby Atmos, SJC8 4.1 ch High Resolution Audio Sound Bar, SJ8 4.1 ch High Resolution Audio Sound Bar, SJ7 Sound Bar Flex with Wireless Subwoofer, SJ6B 2.1 ch High Resolution Audio Sound Bar, SJ5Y-S 2.1 ch High Resolution Audio Sound Bar, SJ4Y-S 2.1 ch High Resolution Audio Sound Bar, SH7B 360W 4.1ch Music Flow Wi-Fi Streaming Sound Bar with Wireless Subwoofer, SH2 100W 2.1ch Sound Bar with Bluetooth® Connectivity, LASC47 2.1 ch High Resolution Audio Sound Bar, LASC27 100W 2.0 ch Sound Bar with Bluetooth® Connectivity, LAS260B 100W 2.0 ch Sound Bar with Bluetooth® Connectivity, SJ2 160W 2.1ch Sound Bar with Bluetooth® Connectivity, SJ4Y 2.1 ch High Resolution Audio Sound Bar, SH5B 320W 2.1ch Sound Bar with Wireless Subwoofer and Bluetooth® Connectivity, SH4 2.1ch 300W Sound Bar with Wireless Subwoofer

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