

EXHIBIT 2

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

KONINKLIJKE PHILIPS N.V., and
PHILIPS NORTH AMERICA LLC

Plaintiffs,

v.

REALTEK SEMICONDUCTOR
CORP.,

Defendant.

C.A. No.:

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Koninklijke Philips N.V. and Philips North America LLC (collectively, “Philips” or “Plaintiffs”) bring this action for patent infringement under 35 U.S.C. § 271 against Realtek Semiconductor Corp. (“Realtek” or “Defendant”), and allege as follows:

THE PARTIES

1. Plaintiff Koninklijke Philips N.V. (formerly known as Koninklijke Philips Electronics N.V.) (“Philips N.V.”) is a corporation duly organized and existing under the laws of The Netherlands, with its principal place of business at High Tech Campus 5, 5656 AE Eindhoven, The Netherlands.

2. Plaintiff Philips North America LLC (formerly known as Philips Electronics North America Corporation) (“Philips North America”) is a limited liability company duly organized and existing under the laws of the State of Delaware with its principal place of business at 222 Jacobs Street, Cambridge, MA 02141. Philips N.V. is the parent of Philips North America.

3. Defendant Realtek Semiconductor Corp. is a corporation duly organized and existing under the laws of Taiwan with a principal place of business located at No. 2 Innovation Road II, Hsinchu Science Park, Hsinchu 300, Taiwan.

4. Defendant, either itself and/or through the activities of its subsidiaries, affiliates, or intermediaries (including distributors, retailers, and others), makes, uses, sells, offers for sale, and/or imports throughout the United States, including within the District of Delaware (this “District”), products, such as digital video-capable integrated circuits and associated firmware that infringe the Asserted Patents, defined below. Defendant makes, uses, sells, offers to sell, and/or imports digital video-capable integrated circuits, that it or its customers incorporate into digital video-capable devices that are made, used, sold, offered for sale, and/or imported throughout the United States, including within this District. These digital video-capable devices may include, but are not limited to, televisions, monitors, displays, projectors, video adapters, and/or video hubs.

THE ASSERTED PATENTS

U.S. Patent No. 9,590,977

5. United States Patent No. 9,590,977 (the “’977 Patent”) is entitled “Secure Authenticated Distance Measurement” and issued on March 7, 2017 to inventor Franciscus L. A. J. Kamperman. The ’977 Patent issued from United States Patent Application No. 15/229,207 filed on August 5, 2016. A copy of the ’977 Patent is attached hereto as Exhibit A.

U.S. Patent No. 10,298,564

6. United States Patent No. 10,298,564 (the “’564 Patent”) is entitled “Secure Authenticated Distance Measurement” and issued on May 21, 2019 to inventor Franciscus L. A. J. Kamperman. The ’564 Patent issued from United States Patent Application No. 16/117,019 filed on August 30, 2018. A copy of the ’564 Patent is attached hereto as Exhibit B.

7. By way of assignment, Philips N.V. owns all rights, title, and interest to the '977 Patent and '564 Patent (collectively, the "Asserted Patents").

8. The Asserted Patents are each valid and enforceable.

JURISDICTION AND VENUE

9. This is a civil action for patent infringement arising under the Patent Act, 35 U.S.C. § 1 *et seq.*

10. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

11. Venue in this District is proper pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b) because Defendant is not a resident of the United States and may be sued in any judicial district, and has committed acts of infringement in this District.

12. This Court has personal jurisdiction over Defendant. Defendant is not subject to jurisdiction in any state's courts of general jurisdiction and the exercise of personal jurisdiction over it is consistent with the United States Constitution and laws. Defendant has and does conduct business within the State of Delaware including in this District. Defendant, directly or through subsidiaries, affiliates or intermediaries (including distributors, retailers, and others), ships, distributes, makes, uses, offers for sale, imports and/or advertises (including by providing an interactive web page) its products and/or services in the United States and this District, and/or contributes to and actively induces its customers to ship, distribute, make, use, offer for sale, sell, import, and/or advertise (including the provision of interactive web pages) infringing products and/or services in the United States and this District. Defendant, directly or through subsidiaries, affiliates or intermediaries (including distributors, retailers, and others), has purposefully and voluntarily placed one or more of its infringing products, or components thereof as described below, into the stream of commerce with the expectation that those products will be purchased, used, and or incorporated into digital video-capable devices made, used,

sold, offered for sale, purchased, and/or imported by customers and/or consumers in this District.

BACKGROUND

13. Philips incorporates the allegations of all of the foregoing paragraphs as if fully restated herein.

14. Philips is a world-renowned company that engages in research and development in numerous fields. One of these fields pertains to digital video-capable devices for delivering and displaying content to users. Exemplary products in this field include televisions, monitors, displays, projectors, video adapters, and/or video hubs. The Asserted Patents derive from Philips's efforts in this field and claim protection for, among other things, delivering and displaying content to users.

15. Defendant made, used, sold, offered for sale, imported, tested, designed, and/or marketed in the United States digital video-capable integrated circuits and associated firmware for delivering and displaying content to users that infringe the Asserted Patents. Such digital video-capable integrated circuits and associated firmware are incorporated into digital video-capable devices made, used, sold, offered for sale or imported into the United States by companies, including but not limited to, Lenovo Group Ltd., LG Electronics Inc., and TCL Industries Holdings Co., and/or their affiliates, subsidiaries or intermediaries (the "Exemplary Customers").

16. Defendant has actual notice of the Asserted Patents. Defendant received actual notice of the Asserted Patents at least as early as September 16, 2020 by way of a letter to Defendant dated September 16, 2020. That letter included allegations of infringement of the Asserted Patents. Additionally, the filing of this Complaint also constitutes notice in accordance with 35 U.S.C. § 287.

17. With actual notice of the Asserted Patents, Defendant has directly infringed, and continues to directly infringe the Asserted Patents under 35 U.S.C. §

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