

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

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| UNILOC 2017 LLC,<br><br>Plaintiff,<br><br>v.<br><br>LG ELECTRONICS U.S.A., INC.<br>and LG ELECTRONICS, INC.,<br><br>Defendants. | CIVIL ACTION NO.:<br><br>PATENT CASE<br><br>JURY TRIAL DEMANDED |
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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, Uniloc 2017 LLC (“Uniloc”), for its complaint against defendants, LG Electronics U.S.A., Inc. and LG Electronics, Inc. (together, “LG”), alleges:

**THE PARTIES**

1. Uniloc 2017 LLC is a Delaware limited liability company, having addresses at 1209 Orange Street, Wilmington, Delaware 19801, 620 Newport Center Drive, Newport Beach, California 92660 and 102 N. College Avenue, Suite 303, Tyler, Texas 75702.

2. LG Electronics U.S.A., Inc. is a Delaware corporation, having a regular and established place of business at 2151-2155 Eagle Parkway, Fort Worth, Texas 76177, and may be served with process through its registered agent for service in Texas: United States Corporation Company, 211 E. 7<sup>th</sup> Street, Suite 620, Austin, Texas 78701.

3. LG Electronics, Inc. is a South Korean corporation, having a principal place of business at LG Twin Tower 128, Yeoui-daero, Yeongdeungpo-gu, Seoul, Korea.

4. LG imports and offers its products, including those accused of infringement, for sale and sells such products to customers located in the Northern District of Texas.

## **JURISDICTION**

5. 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 jurisdiction under 28 U.S.C. §§ 1331, 1332(a), and 1338(a).

## **CLAIM FOR PATENT INFRINGEMENT**

6. Uniloc is the owner, by assignment, of U.S. Patent No. 7,190,408 (“the ’408 Patent”), entitled TV-RECEIVER, IMAGE DISPLAY APPARATUS, TV-SYSTEM AND METHOD FOR DISPLAYING AN IMAGE, which issued on March 13, 2007. A copy of the ’408 Patent is attached as Exhibit A

7. The ’408 Patent describes in detail, and claims in various ways, inventions in systems and devices for improved receipt and decoding of broadcast TV signals to adapt certain portions of the decoded images.

8. The ’408 Patent describes problems and shortcomings in the then-existing field of resolving image sizes to be displayed on a video screen, such as a TV.

9. The written description of the ’408 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 combination of claim elements differed markedly from and improved upon what may have been considered conventional or generic.

10. LG imports, uses, offers for sale, and sells in the United States digital televisions that implement the Advanced Television Systems Committee (“ATSC”) standard and include a zoom picture functionality, including those designated: OLED55B6P, OLED65B6P, OLED55C6P, OLED65C6P, OLED55B7P, OLED55C7P, OLED55E6P, PLED65E6P, OLED55E7P, OLED55B7A, OLED65B7P, OLED65C7P, OLED65E7P, OLED65B7A,

OLED65W7P, OLED77W7P, OLED65G7P, OLED77G7P, 49UJ7700, 55UJ7700, 55UJ7750, 60UJ7700, 65UJ7700, 65UJ7750, 55SJ8000, 55SJ800A, 55SJ8500, 60SJ8000, 60SJ800A, 60SJ8500, 65SJ8000, 65SJ800A, 65SJ8500, 65SJ850A, 65SJ9500, 75SJ8570, 75SJ857A, 86SJ9570, 50UH5500, 65UH5500, 49UH610A, 55UH615A, 60UH615A, 65UH615A, 43UH6100, 49UH6100, 49UH6090, 55UH6090, 55UH6150, 60UH6150, 65UH6150, 50UH6300, 58UH6300, 70UH6350, 43UH6500, 49UH6500, 55UH6550, 60UH6550, 65UH6550, 75UH6550, 43UH7500, 49UH7500, 55UH7500, 60UH7500, 65UH7500, 49UH7700, 55UH7700, 60UH7700, 65UH7700, 55UH8500, 60UH8500, 65UH8500, 75UH8500, 65UH9500, 86UH9500, 98UH9800, (collectively “Accused Infringing Devices”).

11. The Accused Infringing Devices incorporate video screens for displaying images derived from decoded TV signals received, for example, from a television station broadcasting in digital format (“DTV”) where the size of the image may be changed by the viewer. For example, the viewer may use the Live Zoom function to enlarge a portion of the image for better viewing.

12. LG has infringed, and continues to infringe, claims of the ’408 Patent, including claims 1-2 and 7-11, by making, using, offering for sale, selling, and importing the Accused Infringing Devices.

13. LG knowingly and intentionally incorporates into the Accused Infringing Devices components and software that enable the devices to operate as described above to infringe the ’408 Patent.

14. In its marketing, promotional, and instructional materials, including those identified below, LG intentionally instructs its customers to use the Accused Infringing Devices in a manner that causes the devices to infringe the asserted claims of the ’408 Patent.

15. LG has also infringed, and continues to infringe, claims 1-2 and 7-11 of the '408 Patent by actively inducing others to use, offer for sale, and sell the Accused Infringing Devices. LG's customers who use those devices in accordance with LG's instructions infringe claims 1-2 and 7-11 of the '408 Patent. LG intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installation and user guides and instructional and marketing materials, such as those located at:

- [www.lg.com/us/tvs/all-tvs](http://www.lg.com/us/tvs/all-tvs)
- [www.lg.com/4K](http://www.lg.com/4K)
- [www.lg.com/us/support-product/lg-\[product number\]](http://www.lg.com/us/support-product/lg-[product number])  
*e.g.* [www.lg.com/us/support-product/lg-OLED65E7P](http://www.lg.com/us/support-product/lg-OLED65E7P)
- [www.lg.com/us/tvs/all-tvs?&cmpID=SEM\\_HE\\_TV\\_AON\\_Subcat\\_Google\\_\(HE\)-TV-AON-GGL-Srch-Brand-TV-Only-BMM-+lg-+tv&gclid=CMnU25KPI9wCFZmzswodz\\_ELBg&gclsrc=ds](http://www.lg.com/us/tvs/all-tvs?&cmpID=SEM_HE_TV_AON_Subcat_Google_(HE)-TV-AON-GGL-Srch-Brand-TV-Only-BMM-+lg-+tv&gclid=CMnU25KPI9wCFZmzswodz_ELBg&gclsrc=ds)
- [www.lg.com/uk/support/video-tutorials/CT00008334-20150150220640-others](http://www.lg.com/uk/support/video-tutorials/CT00008334-20150150220640-others)
- [www.lg.com/us/tvs/all-tvs](http://www.lg.com/us/tvs/all-tvs)
- [www.youtube.com/user/LGElectronics](http://www.youtube.com/user/LGElectronics)
- [www.youtube.com/user/LGHomeAppliance](http://www.youtube.com/user/LGHomeAppliance)
- [www.youtube.com/watch?v=WhuQ61mcgVw](http://www.youtube.com/watch?v=WhuQ61mcgVw)
- [www.youtube.com/watch?v=nvpcHx788kwc](http://www.youtube.com/watch?v=nvpcHx788kwc)
- [www.youtube.com/watch?v=uoxYO9DslkA](http://www.youtube.com/watch?v=uoxYO9DslkA)

16. LG has also infringed, and continues to infringe, claims 1-2 and 7-11 of the '408 patent by making, using, offering to sell, selling, and importing the Accused Infringing Devices knowing that the devices are used in practicing the processes, or using the systems, of the '408 patent, and constitute a material part of the invention. LG knows portions of the Accused

Devices to be especially made or especially adapted for use in infringement of the '408 patent, not a staple article, and not a commodity of commerce suitable for substantial non-infringing use.

17. LG will have been on notice of the '408 Patent since, at the latest, the service of the complaint upon it in 3:18-cv-02120. LG has also been on notice of Uniloc's infringement allegations and theory of infringement since that date, and thus has known that its continued actions would induce and contribute to the infringement of claims of the '408 Patent. Despite that knowledge, and as further evidence of its intent, LG has refused to discontinue its infringing acts. LG has also induced infringement by failing to remove the infringing functionality from the Accused Infringing Devices or otherwise place a non-infringing limit on its use.

18. By the time of trial, LG will have known and intended (since receiving such notice) that its continued actions would actively induce and contribute to the infringement of claims 1-2 and 7-11 of the '408 Patent.

19. LG may have infringed the '408 Patent through other software and devices utilizing the same or reasonably similar functionality, including other versions of the Accused Infringing Devices.

20. Uniloc has been damaged by LG's infringement of the '408 Patent.

#### **PRAYER FOR RELIEF**

Uniloc requests that the Court enter judgment against LG:

- (A) declaring that LG has infringed the '408 Patent;
- (B) awarding Uniloc its damages suffered as a result of LG's infringement of the '408 Patent;
- (C) awarding Uniloc its costs, attorneys' fees, expenses, and interest, and
- (D) granting Uniloc such further relief as the Court finds appropriate.

**DEMAND FOR JURY TRIAL**

Uniloc demands trial by jury, under Fed. R. Civ. P. 38.

Date: November 17, 2018

Respectfully submitted,

/s/ Aaron Jacobs

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