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17 18	Attorneys for Plaintiff Sharp Corporation UNITED STATES DISTRICT COURT FOR THE					
19 20	CENTRAL DISTRICT OF CALIFORNIA					
21 22	SHARP CORPORATION, a Japan Corporation		ction No. { AINT FO]	3:20-cv-0490 R:		
23 24	Plaintiffs, v.			ENT OF U.S. 6,937,300;		
25 26	VIZIO INC., a California Corporation; TPV TECHNOLOGY,	PAT	TENT NO.	ENT OF U.S. 6,977,704; ENT OF U.S.		
27 28	LTD., a Bermuda Corporation; TPV DISPLAY TECHNOLOGY	PAT	ENT NO.	7,450,206;		

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Case 8:20-cv-00490 Document 1 Filed 03/10/20 Page 2 of 65 Page ID #:2

1 2 3 4 5 6 7 8 9 10 11 12 12	(XIAMEN) COMPANY LIMITED, a China Corporation; TPV INTERNATIONAL (USA), INC., a California Corporation; TREND SMART AMERICA, LTD, a California Corporation; TREND SMART CE MEXICO S.R.L. DE D.V., a Mexico Corporation; XIANYANG CAIHONG OPTOELECTRONICS TECHNOLOGY CO., LTD, a China Corporation Defendants	 (4) INFRINGEMENT OF U.S. PATENT NO. 8,044,907; (5) INFRINGEMENT OF U.S. PATENT NO. 8,446,556; (6) INFRINGEMENT OF U.S. PATENT NO. 8,471,994; (7) INFRINGEMENT OF U.S. PATENT NO. 8,531,634; (8) INFRINGEMENT OF U.S. PATENT NO. 8,558,959; (9) INFRINGEMENT OF U.S. PATENT NO. 8,797,490; (10) INFRINGEMENT OF U.S. PATENT NO. 8,804,079; (11) INFRINGEMENT OF U.S. PATENT NO. 9,081,239; and (12) INFRINGEMENT OF U.S. PATENT NO. 9,201,275 			
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Plaintiff Sharp Corporation¹ ("Plaintiff" or "Sharp"), a Japan Corporation, by and through its undersigned counsel, files this Complaint for Patent Infringement invoking the Court's jurisdiction under 28 U.S.C. §§ 1331 and 1338(a) because the claims set forth herein arise under the patent laws of the United States, 35 U.S.C. § 1 et seq., and asserting claims against the following Defendants:

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Vizio Inc. ("Vizio"), a California Corporation;

TPV Technology, Ltd. ("TPV"), a Bermuda Corporation; TPV Display Technology (Xiamen) Company Limited, a China Corporation; TPV International (USA), Inc., a California Corporation; Trend Smart America, Ltd ("Trend Smart America"), a California Corporation; Trend Smart CE Mexico S.R.L. De D.V. ("Trend Smart CE"), a Mexico Corporation (collectively, "TPV Defendants"); and

12 Xianyang CaiHong Optoelectronics Technology Co., Ltd. ("CHOT"), a China Corporation. 13

Sharp alleges based on its knowledge, information, and belief, as follows:

SHARP AND ITS LIQUID CRYSTAL DISPLAY INNOVATIONS

16 1. For more than 40 years, Sharp has been recognized as a pioneering innovator in the Liquid Crystal Display ("LCD") industry. Sharp has invested 18 immense resources—and countless hours by its employees in the United States and around the world—developing and furthering the LCD technologies used in the marketplace.

21 2. Because of these efforts, the Sharp brand is synonymous with leading 22 LCD technologies and is famous throughout the world.

23 Sharp's reputation is built upon the proprietary technologies that Sharp 3. 24 and its predecessors developed. Sharp holds more than 10,000 LCD patents in the 25 United States, China, and Japan. This intellectual property is the backbone of Sharp's 26 commercial success.

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¹ Sharp Corporation is also known as Sharp Kabushiki Kaisha.

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4. Recently, Sharp learned that Defendant CHOT is making, using, importing, offering to sell, and selling LCD panels that infringe a large number of Sharp's patents. The TPV Defendants, acting in concert with CHOT, manufacture, import, and sell televisions that further infringe Sharp's patents. Those televisions are sold to Vizio, which likewise infringes when it offers the televisions to consumers in retail outlets throughout the United States.

5. Sharp's efforts to halt this infringing conduct have been unsuccessful. The infringing products are displacing Sharp's products and sales, and they are causing significant financial harm to Sharp. Sharp has therefore brought this action to stop the Defendants from using Sharp's intellectual property.

NATURE OF THE ACTION

12 6. This action arises under the patent laws of the United States, 35 U.S.C. §§ 1, et seq., from Defendants' infringement of U.S. Patent Nos. 6,937,300 ("the '300 13 14 Patent"); 6,977,704 ("the '704 Patent"); 7,450,206 ("the '206 Patent"); 8,044,907 15 ("the '907 Patent"); 8,446,556 ("the '556 Patent"); 8,471,994 ("the '994 Patent"); 16 8,531,634 ("the '634 Patent"); 8,558,959 ("the '959 Patent") 8,797,490 ("the '490 17 Patent"); 8,804,079 ("the '079 Patent"); 9,081,239 ("the '239 Patent"); and 9,201,275 18 ("the '275 Patent") (collectively, the "Patents-in-Suit").

19 7. Sharp is the rightful owner of the Patents-in-Suit. The listed assignee of the patents, Sharp Kabushiki Kaisha, is Sharp's name in transliterated English. 20

8. Sharp seeks injunctive relief as well as damages comprising both lost 22 profits and a reasonable royalty.

THE PARTIES

Sharp is a corporation organized under the laws of Japan with its 9. principal place of business at 1 Takumi-cho, Sakai-ku, Sakai City, Osaka 590-8522, Japan Osaka, Japan.

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10. Defendant Vizio is incorporated under the laws of California. Vizio has a principal place of business at 39 Tesla, Irvine, CA 92618. Vizio may be served through its registered agent for service, Registered Agent Solutions, Inc., via Ricardo Orozco at 1220 South St. Ste. 150, Sacramento, CA 95811.

 Defendant TPV is incorporated in under the laws of Bermuda. On information and belief, TPV has a principal place of business at Units 1208-16, 12/F, C-Bons International Center, 108 Wai Yip Street, Kwun Tong, Kowloon, Hong Kong. On information and belief, TPV 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.

12. TPV Display Technology (Xiamen) Co., Ltd. ("TPV Xiamen") is organized under the laws of China, headquartered at No. 1, Xianghai Road, (Xiang'An) Industrial Zone, Torch Hi-New Zon, Xiamen, Fujian, 361101, China. On information and belief, TPV Xiamen may be served with process in China pursuant to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters. TPV Xiamen is a subsidiary of TPV. *See, e.g.*, https://www.tpv-tech.com/en/PrincipalSubsidiaries.aspx.

13. TPV International (USA), Inc. ("TPV USA") is organized under the laws
of the State of California and maintains its principal place of business at 3737
Executive Center Drive, Suite 261, Austin, Texas 78731. On information and belief,
TPV USA can be served with process via its registered agent listed with the California
Secretary of State, Registered Agent Solutions, Inc. c/o Ricardo Orozco. 1220 South
St. Ste. 150, Sacramento, CA 95811. TPV USA is a subsidiary of TPV. *See, e.g.*,
https://www.tpv-tech.com/en/PrincipalSubsidiaries.aspx.

14. Defendant Trend Smart America is incorporated under the laws of
California. On information and belief, Trend Smart America has a principal place of
business at 2 South Pointe Dr. Ste. 152, Lake Forest, CA, 92630. On information and

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