

1 Christina N Goodrich (SBN 261722)
christina.goodrich@klgates.com

2 **K&L GATES LLP**
10100 Santa Monica Blvd., 8th Floor
3 Los Angeles, CA 90067
Tel: (310) 552-5547
4 Fax: (310) 552-5001

5 Theodore J. Angelis (*Pro hac vice* filed
concurrently herewith)

6 theodore.angelis@klgates.com
Elizabeth J. Weiskopf (*Pro hac vice* filed
concurrently herewith)
7 elizabeth.weiskopf@klgates.com

8 **K&L GATES LLP**
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
9 Tel: (206) 370-8101
10 Fax: (206) 370-6006

11 Jason A. Engel (*Pro hac vice* filed
concurrently herewith)

12 jason.engel@klgates.com
Erik J. Halverson (*Pro hac vice* filed
concurrently herewith)
13 erik.halverson@klgates.com

14 **K&L GATES LLP**
70 W. Monroe, Suite 3300
Chicago, IL 60602
15 Tel: (312) 807-4236
16 Fax: (312) 827-8145

17 *Attorneys for Plaintiff Sharp Corporation*

18 **UNITED STATES DISTRICT COURT FOR THE**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 **SHARP CORPORATION, a Japan**
21 **Corporation**

22 **Plaintiffs,**

23 **v.**

24 **VIZIO INC., a California**
25 **Corporation; TPV TECHNOLOGY,**
26 **LTD., a Bermuda Corporation; TPV**
27 **DISPLAY TECHNOLOGY**

Civil Action No. 8:20-cv-0490

COMPLAINT FOR:

- 28 (1) **INFRINGEMENT OF U.S. PATENT NO. 6,937,300;**
- (2) **INFRINGEMENT OF U.S. PATENT NO. 6,977,704;**
- (3) **INFRINGEMENT OF U.S. PATENT NO. 7,450,206;**

COMPLAINT FOR INFRINGEMENT OF PATENTS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**(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**

JURY TRIAL DEMANDED

1 Plaintiff Sharp Corporation¹ (“Plaintiff” or “Sharp”), a Japan Corporation, by
2 and through its undersigned counsel, files this Complaint for Patent Infringement
3 invoking the Court’s jurisdiction under 28 U.S.C. §§ 1331 and 1338(a) because the
4 claims set forth herein arise under the patent laws of the United States, 35 U.S.C. § 1
5 *et seq.*, and asserting claims against the following Defendants:

- 6 • Vizio Inc. (“Vizio”), a California Corporation;
- 7 • TPV Technology, Ltd. (“TPV”), a Bermuda Corporation; TPV Display
8 Technology (Xiamen) Company Limited, a China Corporation; TPV International
9 (USA), Inc., a California Corporation; Trend Smart America, Ltd (“Trend Smart
10 America”), a California Corporation; Trend Smart CE Mexico S.R.L. De D.V.
11 (“Trend Smart CE”), a Mexico Corporation (collectively, “TPV Defendants”); and
12 • Xianyang CaiHong Optoelectronics Technology Co., Ltd. (“CHOT”), a
13 China Corporation.

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

15 **SHARP AND ITS LIQUID CRYSTAL DISPLAY INNOVATIONS**

16 1. For more than 40 years, Sharp has been recognized as a pioneering
17 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
19 around the world—developing and furthering the LCD technologies used in the
20 marketplace.

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

23 3. Sharp’s reputation is built upon the proprietary technologies that Sharp
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.

27 ¹ Sharp Corporation is also known as Sharp Kabushiki Kaisha.

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

5 11. Defendant TPV is incorporated in under the laws of Bermuda. On
6 information and belief, TPV has a principal place of business at Units 1208-16, 12/F,
7 C-Bons International Center, 108 Wai Yip Street, Kwun Tong, Kowloon, Hong Kong.
8 On information and belief, TPV may be served with process in Hong Kong pursuant
9 to the Hague Convention on the Service Abroad of Judicial and Extrajudicial
10 Documents in Civil or Commercial Matters.

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

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

25 14. Defendant Trend Smart America is incorporated under the laws of
26 California. On information and belief, Trend Smart America has a principal place of
27 business at 2 South Pointe Dr. Ste. 152, Lake Forest, CA, 92630. On information and
28

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.