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14 *Roku, Inc.*

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 **ROKU, INC.,**
18 a Delaware Company,

19 Plaintiff,

20 v.

21 **UNIVERSAL ELECTRONICS, INC.,**
22 a Delaware Company; **GEMSTAR**
23 **TECHNOLOGY (QINZHOU) CO.**
24 **LTD.,** a Chinese Company; **GEMSTAR**
25 **TECHNOLOGY (YANGZHOU) CO.**
26 **LTD.,** a Chinese Company; **C.G.**
27 **DEVELOPMENT LTD.,** a Hong Kong
28 Company; **UNIVERSAL**
ELECTRONICS BV, a Netherlands
Company; **UEI BRASIL CONTROLES**
REMOTOS LTDA., a Brazilian
Company; **CG MÉXICO REMOTE**
CONTROLS, S. DE R.L. DE C.V., a
Mexican Company,

Defendants.

Case No. 8:21-cv-00658

COMPLAINT FOR PATENT
INFRINGEMENT

DEMAND FOR JURY TRIAL

1 **COMPLAINT**

2 1. Plaintiff Roku, Inc. (“Roku” or “Plaintiff”) brings this action against
3 Universal Electronics, Inc., Gemstar Technology (Qinzhou) Co. Ltd., Gemstar
4 Technology (Yangzhou) Co. Ltd., C.G. Development Ltd., Universal Electronics BV,
5 UEI Brasil Controles Remotos Ltda., and CG México Remote controls, S. de R.L. de
6 C.V. (collectively, “UEI” or “Defendants”) and alleges as follows.

7
8 **NATURE OF THE ACTION**

9 2. This is an action for patent infringement. Defendant UEI has infringed
10 and continues to infringe, contribute to the infringement of, and/or actively induce
11 others to infringe U.S. Patent Nos. 8,378,875 (“the ’875 Patent”) and 7,388,511
12 (“the ’511 Patent”) (collectively, the “Patents-in-Suit”).

13
14 **THE PARTIES**

15 3. Roku is a public corporation organized and existing under the laws of
16 the State of Delaware, with its principal place of business located at 1155 Coleman
17 Ave., San Jose, California 95110. Roku was the pioneer of the streaming TV and is
18 the leading TV streaming platform in the U.S. by hours streamed. By the end of 2020,
19 Roku had more than 51.2 million active accounts. Roku users streamed 58.7 billion
20 hours of content in 2020.

21 4. On information and belief, Universal Electronics Inc. is a Delaware
22 corporation with its headquarters at 15147 N. Scottsdale Road, Suite H300,
23 Scottsdale, Arizona 85254.

24 5. On information and belief, Gemstar Technology (Qinzhou) Co. Ltd. is
25 a company organized under the laws of the People’s Republic of China with its
26 principal place of business at Hedong Industrial Park, Qinzhou, Guangxi Province,
27 535000 China.

28

1 Civil Procedure § 410.10. UEI has a principal place of business in the state of
2 California, and, as a result, UEI is subject to general jurisdiction here. UEI has
3 infringed Roku’s asserted patents in California, and, as a result, UEI is subject to
4 specific jurisdiction here. In particular, UEI sells, licenses, and offers to sell and
5 license hardware and software relating to remote control devices and associated
6 products that infringe Roku’s asserted patents in California, and specifically in this
7 judicial district. UEI does business in this judicial district relating to UEI’s accused
8 products, and has an office located in this district at 201 E. Sandpointe Ave., Santa
9 Ana, CA 92707. On information and belief, each of UEI’s foreign subsidiaries is
10 subject to specific jurisdiction in this district at least because each of them
11 manufactures for import and imports into the United States and particularly into this
12 District, remote control devices and associated products that infringe Roku’s patents,
13 and, on information and belief, each of them conducts business with parent company
14 UEI related to the infringing technology at UEI’s offices at 201 E. Sandpointe Ave.,
15 Santa Ana, CA 92707.

16 14. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b),
17 1391(c) and 1400(b).

18 THE PATENTS-IN-SUIT

19 15. On February 19, 2013, United States Patent No. 8,378,875, entitled
20 “Method of Programming a Universal Remote Control,” was duly and legally issued
21 by the United States Patent and Trademark Office. A copy of the ’875 Patent is
22 attached hereto as Exhibit A.

23 16. On June 17, 2008, United States Patent No. 7,388,511, entitled “System
24 for Remote Control of Identical Devices,” was duly and legally issued by the United
25 States Patent and Trademark Office. A copy of the ’511 Patent is attached hereto as
26 Exhibit B.

27 17. Roku is the owner of all right, title and interest in and to the ’875
28 and ’511 Patents, including the right to all remedies for infringement thereof.

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