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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LARGAN PRECISION CO., LTD.,
Plaintiff,
vs.
MOTOROLA MOBILITY LLC,
Defendant.

Case No.: 5:21-cv-9138

**COMPLAINT FOR
PATENT INFRINGEMENT
DEMAND FOR JURY TRIAL**

COMPLAINT

Plaintiff Largan Precision Co., Ltd. (“Largan”) hereby makes this complaint against Motorola Mobility LLC (“Motorola”) as follows:

NATURE OF ACTION

1. This is a patent infringement action. Largan seeks damages for Motorola’s infringement of Largan’s patented optical lens assemblies in the United States.

1 **INTRADISTRICT ASSIGNMENT**

2 2. This is an intellectual property action and shall be assigned on a district-wide
3 basis pursuant to Civil L.R. 3-2(c) and this Court’s Assignment Plan.

4 **PARTIES**

5 3. Largan is a Taiwanese corporation with its principal place of business located at
6 No. 11, Jingke Road, Nantun District, Taichung City 40852, Taiwan. Largan was founded in
7 1987 and has been publicly listed on the Taiwan Stock Exchange since 2002.

8 4. On information and belief, Motorola is a limited liability company organized
9 under the laws of the State of Delaware with a principal place of business located at 222 W.
10 Merchandise Market Plaza Suite 1800, Chicago, Illinois 60654. On information and belief,
11 Motorola is and has been registered to do business in California since at least August 7, 2012.
12 Motorola may be served with process in California through its registered agent C T Corporation
13 System, at 330 N. Brand Boulevard, Suite 700, Glendale, California 91203. On information and
14 belief, Motorola is indirectly a wholly-owned subsidiary of Lenovo Group, Ltd. (“Lenovo
15 Group”). On information and belief, Lenovo Group is a company incorporated under the laws of
16 the People’s Republic of China and having a principal place of business at No. 6 Chuang Ye
17 Road, 2 Haidian District, Beijing, China 100085.

18 **FACTUAL BACKGROUND**

19 5. Largan is a world leader in the research, development, design, and production of
20 high-end imaging lenses, optical lens modules, and optoelectronic components. A pioneer in the
21 field of imaging, Largan’s lenses can be found in a wide array of consumer electronic products,
22 including smartphones, notebook computers, laptop computers, tablets, webcams, and scanners,
23 from a variety of end-product manufacturers.

24 6. Largan’s success is founded upon its innovations, and Largan often appears on
25 lists of Taiwan’s most innovative companies. In the field of imaging, Largan revolutionized the
26 design and production of plastic aspherical lenses while other lens manufacturers relied on glass
27 lenses. Largan’s innovations have enabled smartphones and computers to maintain and even
28 improve their imaging capabilities despite demand for smaller lens assemblies. To meet this

1 demand for compact, high-performance imaging lenses, Largan has developed new technologies,
2 for which it has sought and obtained patent protection in the United States and elsewhere. Largan
3 currently owns around 700 U.S. patents.

4 7. The inventions disclosed in U.S. Patent Nos. 8,310,767 (“the ’767 patent”),
5 8,514,499 (“the ’499 patent”), 9,696,519 (“the ’519 patent”), 9,784,948 (“the ’948 patent”),
6 10,209,487 (“the ’487 patent”), and 10,564,397 (“the ’397 patent”) (collectively, the “Asserted
7 Patents”) exemplify Largan’s state-of-the-art optical lens assemblies. These inventions
8 demonstrate Largan’s status as a world leader in the research and design of optical imaging
9 technology.

10 8. The inventions of the Asserted Patents generally relate to compact optical lens
11 assemblies supporting image capture with smaller pixel sizes and increased resolution, resulting
12 in high image quality. Compared to conventional lens assemblies, the lens assemblies of the
13 Asserted Patents have a reduced total track length, which results in a smaller size ideal for use in
14 high-end, portable consumer electronics such as smartphones and laptop computers. The unique
15 and specific characteristics of the lens elements within the lens assemblies of the Asserted
16 Patents enable this desirable combination—high image quality from a small lens assembly.

17 9. The inventions claimed in the Asserted Patents represent innovative advances in
18 the field of optical lens assemblies. The claims are directed to tangible, real-world products with
19 specific properties and characteristics. The claims are not directed to abstract ideas. Moreover,
20 specific elements of the claims of the Asserted Patents individually and as an ordered
21 combination were not well-understood, routine, or conventional before the priority dates of the
22 patents. For example, the claimed inventions comprise lens elements having specific shapes,
23 curvatures, and properties, which, alone or in the specific arrangement and combination, were
24 not well-understood, routine, or conventional.

25 **MOTOROLA’S INFRINGING PRODUCT**

26 10. Motorola sells a variety of mobile phone products in the United States and
27 throughout the world. Nearly all, if not all, of the mobile phone products Motorola sells in the
28

1 United States today have cameras and/or camera systems capable of capturing digital images
2 and/or video.

3 11. Motorola has sold, offers for sale, and currently sells, for example, the Motorola
4 One 5G Ace (“5G Ace”) in the United States and in this District. The 5G Ace has a camera
5 system or systems comprised of several lens assemblies, including lens assemblies for a rear-
6 facing main camera (“Main Lens”) and a rear-facing ultrawide camera (“Wide Lens”).

7 12. On June 15, 2021, Largan contacted Lenovo Group via e-mail identifying the
8 patents and claims that the 5G Ace infringes, including the Asserted Patents.

9 13. On August 6, 2021, Largan sent another communication to Lenovo Group
10 explaining that the 5G Ace infringes the ’767 patent, the ’499 patent, the ’487 patent, and
11 the ’397 patent because the camera lenses in the 5G Ace meet all elements of certain claims of
12 those patents. Largan also provided Lenovo Group with claim charts detailing how the Main
13 Lens and the Wide Lens meet the elements of certain claims.

14 14. Though representatives from Lenovo Group have acknowledged receipt of
15 Largan’s August 6, 2021 letter, Motorola has nevertheless continued to sell and offer for sale the
16 5G Ace in this District and throughout the United States.

17 15. Lenovo Group has been on notice of infringement of the Asserted Patents since at
18 least June 15, 2021.

19 16. Motorola, through its parent Lenovo Group, was informed of the Asserted Patents
20 prior to the filing of this lawsuit.

21 17. Largan has satisfied the statutory requirement to mark its products in accordance
22 with 35 U.S.C. § 287.

23 **JURISDICTION AND VENUE**

24 18. This action arises under the U.S. Patent Act, codified at 35 U.S.C. § 1 et seq., and
25 in particular, but not limited to, 35 U.S.C. §§ 271, 281, 283, 284 and 285.

26 19. This Court has original jurisdiction over the subject matter of this action under
27 28 U.S.C. §§ 1331 and 1338(a) because the claims arise under the patent laws of the United
28 States.

1 20. This Court has personal jurisdiction over Motorola in this action because
2 Motorola has committed acts within this District giving rise to this action and has established
3 minimum contacts with this forum such that the exercise of jurisdiction over Motorola would not
4 offend traditional notions of fair play and substantial justice. Motorola, directly and/or through
5 subsidiaries or intermediaries, has committed and continues to commit acts of infringement in
6 this District by, among other things, making, using, offering for sale, selling, and importing
7 products that infringe the Asserted Patents, such as the 5G Ace.

8 21. By knowingly putting at least the 5G Ace into the stream of commerce in this
9 District, Motorola has purposefully availed itself of the privileges of conducting business in the
10 United States, California, and this District, and sought the protection and benefits from the laws
11 of the United States and California and thus has subjected itself to personal jurisdiction here.

12 22. Venue is proper in this Court under 28 U.S.C. §§ 1391 and 1400(b). Motorola has
13 transacted business in this District and has committed acts of infringement in this District by,
14 among other things, making, using, offering to sell, selling, and/or importing products that
15 infringe the Asserted Patents. On information and belief, Motorola is registered to do business in
16 California and maintains physical offices with employees in this District.

17 23. On information and belief, Motorola has regular and established places of
18 business in this District. For example, Motorola maintains offices and/or employs employees at
19 3325 Scott Boulevard, Santa Clara, California 95054 and at 1000 Enterprise Way, Sunnyvale,
20 California 94089 (<https://www.motorola.com/us/about/contact>). Motorola also advertises jobs,
21 including engineering jobs, in this District¹ and has previously admitted and/or not challenged
22 that venue for patent infringement cases in this District is proper.²

24 ¹ See https://jobs.lenovo.com/en_US/careers/JobDetail/Android-Software-Engineer/19096 (last
25 visited Nov. 15, 2021). Though this web page is at corporate parent Lenovo’s website, the
26 Motorola logo is prominently displayed. In addition, under “Description and Requirements,” the
27 web page states that “Motorola Mobility (a Lenovo Company) is one of the world’s fastest
growing smartphone providers”

28 ² See, e.g., *Semiconductor Energy Lab. Co. v. BOE Tech. Grp., Ltd.*, 3:20-cv-04297-EMC (N.D.
Cal. filed June 29, 2020); *Neodron Ltd. v. Lenovo Grp. Ltd.*, 3:19-cv-05644-SI (N.D. Cal. filed

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