

I. NATURE OF THE SUIT

1. This is a claim for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

II. THE PARTIES

2. Plaintiff **511 Innovations, Inc.** is a Texas corporation that maintains its principal place of business in Marshall, Texas.

3. Defendant **Samsung Telecommunications America, LLC** is a Delaware limited liability company that does business in Texas and maintains its principal place of business in Richardson, Texas.

4. Defendant **Samsung Electronics America, Inc.** is a New York corporation that does business in Texas, directly or through intermediaries, and maintains its principal place of business in Ridgefield Park, New Jersey.

5. Defendant **Samsung Electronics Co., Ltd.** is a Korean company that does business in Texas, directly or through intermediaries, and maintains its principal place of business in Seoul, Korea.

6. Defendant **Huawei Technologies USA Inc.** is a Texas corporation that does business in Texas and maintains its principal place of business in Plano, Texas.

7. Defendant **Huawei Device USA Inc.** is a Texas corporation that does business in Texas and maintains its principal place of business in Plano, Texas.

8. Defendant **Huawei Technologies Co., Ltd.** is a Chinese company that does business in Texas, directly or through intermediaries, and maintains its principal place of business in Shenzhen, China.

9. Defendant **ZTE (USA) Inc.** is a New Jersey corporation that does business in Texas and maintains its principal place of business in Richardson, Texas.

10. Defendant **ZTE Corporation** is a Chinese company that does business in Texas, directly or through intermediaries, and maintains its principal place of business in Shenzhen, China.

11. Defendant **AMS-TAOS USA Inc.** (“AMS-TAOS”) is a Nevada corporation that does business in Texas and maintains its principal place of business in Plano, Texas.

12. Defendant **AMS-TAOS USA Inc.** is formerly known as Texas Advanced Optoelectronics Solutions, Inc.

13. Defendant **ams AG** is an Austrian company that does business in Texas, directly or through intermediaries, and maintains its principal place of business in Unterpremstaetten, Austria.

III. JURISDICTION AND VENUE

14. This action arises under the patent laws of the United States, Title 35 of the United States Code. Thus, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

15. This Court has general personal jurisdiction over Defendant Samsung Telecommunications America, LLC by virtue of Samsung Telecommunications America, LLC maintaining its principal place of business in this State.

16. This Court has general personal jurisdiction over Defendant Huawei Technologies USA Inc. by virtue of Huawei Technologies USA Inc.’s incorporation in this State and also by virtue of Huawei Technologies USA Inc. maintaining its principal place of business in this State.

17. This Court has general personal jurisdiction over Defendant Huawei Device USA Inc. by virtue of Huawei Device USA Inc.'s incorporation in this State and also by virtue of Huawei Device USA Inc. maintaining its principal place of business in this State.

18. This Court has general personal jurisdiction over Defendant ZTE (USA) Inc. by virtue of ZTE (USA) Inc. maintaining its principal place of business in this State.

19. This Court has general personal jurisdiction over Defendant AMS-TAOS by virtue of AMS-TAOS maintaining its principal place of business in this State.

20. This Court has specific personal jurisdiction over all Defendants pursuant to due process and the Texas Long Arm Statute because each Defendant, directly or through intermediaries, has conducted and does conduct substantial business in this forum, such substantial business including but not limited to: (i) at least a portion of the infringements alleged herein; (ii) purposefully and voluntarily placing one or more infringing products or services into the stream of commerce with the expectation that they will be purchased by consumers in this forum; or (iii) regularly doing or soliciting business, engaging in other persistent courses of conduct, or deriving substantial revenue from goods and services provided to individuals in Texas and in this District.

21. Venue is proper in this Court under 28 U.S.C. §§ 1391(b)-(d) and 1400(b) for the reasons set forth above. Furthermore, venue is proper because each Defendant, directly or through intermediaries, sells and offers to sell infringing products to persons in this District, as discussed below. Each of Defendants' infringing acts in this District gives rise to proper venue.

IV. BACKGROUND

A. The Asserted Patents

22. This cause of action asserts infringement of United States Patent Nos. 6,307,629 B1; 6,490,038 B1; 7,113,283 B2; 6,915,955 B2; 7,110,096 B2; 7,397,541 B2; 8,472,012 B2; and 8,786,844 B2 (collectively, the “Asserted Patents”).

23. A true and correct copy of United States Patent No. 6,307,629 B1 (the “’629 Patent”), entitled “Apparatus and Method for Measuring Optical Characteristics of an Object,” is attached hereto as Exhibit A.

24. 511 Innovations is the current owner by assignment of all rights, title, and interest in and under the ’629 Patent, which duly and legally issued on October 23, 2001, with Wayne D. Jung, Russell W. Jung, and Alan R. Loudermilk as the named inventors. 511 Innovations has standing to sue for infringement of the ’629 Patent.

25. A true and correct copy of United States Patent No. 6,490,038 B1 (the “’038 Patent”), entitled “Apparatus and Method for Measuring Optical Characteristics of an Object,” is attached hereto as Exhibit B.

26. 511 Innovations is the current owner by assignment of all rights, title, and interest in and under the ’038 Patent, which duly and legally issued on December 3, 2002, with Wayne D. Jung, Russell W. Jung, and Alan R. Loudermilk as the named inventors. 511 Innovations has standing to sue for infringement of the ’038 Patent.

27. A true and correct copy of United States Patent No. 7,113,283 B2 (the “’283 Patent”), entitled “Apparatus and Method for Measuring Color,” is attached hereto as Exhibit C.

28. 511 Innovations is the current owner by assignment of all rights, title, and interest in and under the ’283 Patent, which duly and legally issued on September 26, 2006, with Wayne

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