

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**SEOUL SEMICONDUCTOR CO.,
LTD. and SEOUL VIOSYS CO., LTD.**

Plaintiffs,

v.

FRY'S ELECTRONICS, INC.

Defendant.

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CIVIL ACTION NO. 18-cv-386

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

Plaintiffs Seoul Semiconductor Co., Ltd. (“Seoul Semiconductor”) and Seoul Viosys Co., Ltd. (“Seoul Viosys”), (collectively “Plaintiffs”) for their Amended Complaint against Defendant Fry’s Electronics, Inc. (“Fry’s”) allege as follows:

INTRODUCTION

1. Plaintiffs bring this patent infringement action to protect their valuable patented technology relating to light-emitting diodes (“LEDs”) and LED technology in lighting and televisions. An LED is a semiconductor device that converts electrical energy into light. LEDs have many advantages over conventional light sources, including lower energy consumption, longer lifetime, and smaller size.

2. Seoul Semiconductor was founded in 1992 with around 30 employees in a small space of a commercial building in Bongchen-dong, Seoul. From those 30 employees, Seoul Semiconductor grew into one of the largest manufacturers of LEDs in the world. Seoul Viosys is also a leading company in the LED industry and an affiliate company of Seoul Semiconductor.

3. Seoul Semiconductor’s success is in large part due to its significant investment in innovation and respect for intellectual property. Seoul Semiconductor has invested in research and

development (“R&D”) for the last two decades. Seoul Semiconductor invests over 10% of sales revenue into R&D and owns one of the largest LED patent portfolios in the world, which includes more than 10,000 patents worldwide.

THE PARTIES

4. Plaintiff Seoul Semiconductor is a company organized and existing under the laws of the Republic of Korea, with its principal place of business at 1B-25, 727, Wonsi-dong, Danwon-gu, Ansan-city, Gyeonggi-do, Korea 425-851.

5. Plaintiff Seoul Viosys is a company organized and existing under the laws of the Republic of Korea, with its principal place of business at 65-16, Sandan-ro163beon-gil, Danwon-gu, Ansan-si, Gyeonggi-do, Korea 425-851.

6. On information and belief, Fry’s is a company organized and existing under the laws of the State of California with its principal place of business at 600 East Brokaw Road, San Jose, California 95112.

7. On information and belief, Fry’s is in the business of offering for sale, selling and distributing lighting products including light products based on LED technology and offering for sale, sell and distributing televisions including televisions based on LED technology.

8. Among Fry’s television products are the RCA LED TV LED24G45RQ, the RCA LED TV LED55C55R120Q, and the RCA LED TV LED60B55R120Q.

9. An image of the packaging for the RCA LED TV LED24G45RQ television is provided below left. An image of the RCA LED TV LED24G45RQ television is provided below right.



10. An image of the packaging for the RCA LED TV LED55C55R120Q television is provided below left. An image of the RCA LED TV LED55C55R120Q television is provided below right.



11. An image of the RCA LED TV LED60B55R120Q television is provided below.



12. Among Fry's lighting products are the Ottlite LED Task Lamp 290G59, NTE LED Wall Light 69-LL-10, and the NTE LED Light Bar 69-LL-15.

13. An image of the packaging for the Ottlite LED Task Lamp 290G59 is provided below left. An image of the Ottlite LED Task Lamp 290G59 is provided below right.



14. An image of the packaging for the NTE LED Wall Light 69-LL-10 is provided below left. An image of the NTE LED Wall Light 69-LL-10 is provided below right.

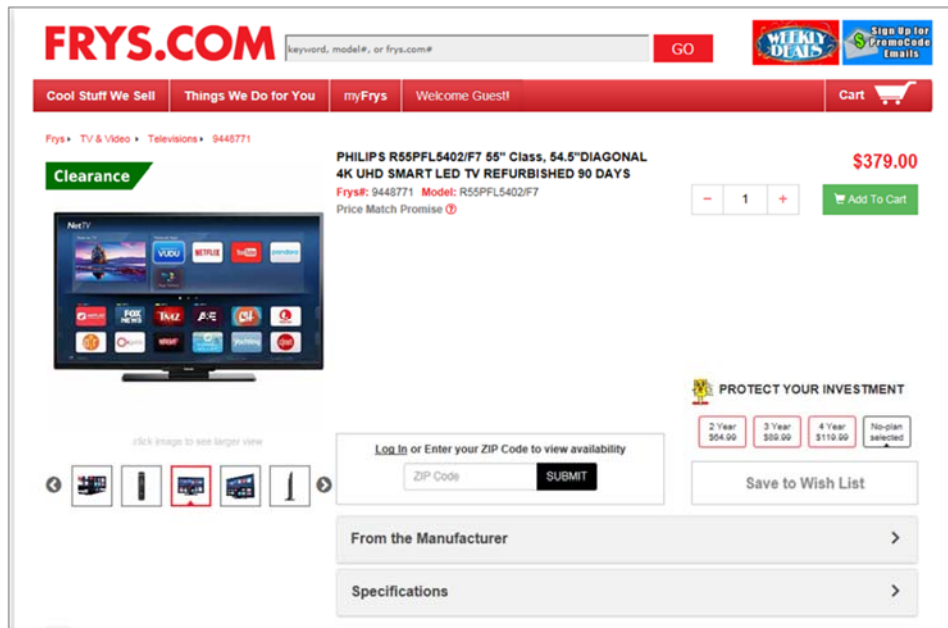


15. The first image below is of the packaging for the NTE LED Light Bar 69-LL-15. The second image below is of the NTE LED Light Bar 69-LL-15.





- 16. Among Fry's television products is the Philips 55PFL5402/F7.
- 17. An image of Fry's webpage for the 55PFL5402/F7 television is provided below.



- 18. An image of the front of the 55PFL5402/F7 television is provided below.



JURISDICTION AND VENUE

- 19. This is an action for patent infringement, under the patent laws of the United States, 35 U.S.C. § 271 *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§1331 and 1338(a).

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