

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

STAR CO LED TECHNOLOGIES, LLC, a
Texas limited liability company,

Plaintiff,

vs.

SHARP CORPORATION, a Japanese
corporation; SHARP ELECTRONICS
CORPORATION, a New York corporation;
SONY ELECTRONICS, INC, a Delaware
corporation; and VIDEOLAND, d/b/a
MODIA HOME THEATRE STORE, a Texas
corporation;

Defendants.

CASE NO. 2:13-cv-416

JURY DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff STAR CO LED Technologies, LLC (“STAR CO LED”) sues Defendants Sharp Corporation, Sharp Electronics Corporation, Sony Electronics, Inc., and Videoland, d/b/a/ Modia Home Theatre Store, (collectively “Defendants”) and, on information and belief, alleges as follows:

Introduction

1. Plaintiff STAR CO LED owns the inventions described and claimed in United States Patent No. 6,964,489 (entitled “Device For Producing An Image”) and referred to herein as the ‘489 patent). Defendants have used and continue to use Plaintiff’s patented technology in products that they make, use, import, sell, and offer to sell. Plaintiff STAR CO LED seeks damages for patent infringement and an injunction preventing Defendants from making, using,

selling, importing, or offering to sell products embodying the technology claimed by the Patents without Plaintiff's permission.

Jurisdiction and Venue

2. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 271 and 281, et seq. The Court has original jurisdiction over this patent infringement action under 28 U.S.C. § 1338(a).

3. Each of the Defendants has committed acts and continues to commit acts within this judicial district giving rise to this action. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) and § 1400.

Plaintiff Advanced Display

4. Plaintiff STAR CO LED is a limited liability company existing under and by virtue of the laws of the State of Texas, with its principal place of business in Longview, Texas.

The Patents

5. The United States Patent and Trademark Office issued the '489 patent (attached as exhibit A) on November 15, 2005. Through assignment, Plaintiff is the owner of all right, title, and interest in the '489 patent, including all rights to pursue and collect damages for past infringement of the '489 patent.

Defendants

6. Sharp Corporation is a Japanese corporation with a principal place of business in Osaka, Japan. Sharp Electronics Corporation is a New York corporation with a principal place of business in Mahwah, NJ. Collectively these Defendants are referred to as "Sharp."

7. Sony Electronics, Inc. ("SEL") is a Delaware corporation with its principal place of business in San Diego, California.

8. Videoland, Inc., d/b/a Modia Home Theatre Store (“Modia”) is a Texas corporation, with a principle place of business in Houston, Texas.

FIRST CLAIM FOR PATENT INFRINGEMENT (‘489 PATENT)

9. Plaintiff incorporates by reference each of the allegations in paragraphs 1 - 8 above and further alleges as follows:

10. The United States Patent and Trademark Office issued the ‘489 patent on November 15, 2005. Plaintiff is the owner of the ‘489 patent with full rights to pursue recovery of royalties or damages for infringement of the patent, including full rights to recover damages for past, ongoing, and future infringement of the patent.

11. Defendant Sharp has infringed the ‘489 patent and, unless enjoined, will continue to do so by manufacturing, importing, using, selling, or offering for sale products that produce images utilizing light-emitting diodes (LED’s) and a liquid crystal display (LCD) that include display technology that infringes one or more claims of the ‘489 patent, including, but not limited to, LED televisions bearing model numbers LC-70LE732U, LC-80LE632U, and LC-90LE745U.

12. Defendant SEL has infringed the ‘489 patent and, unless enjoined, will continue to do so by manufacturing, importing, using, selling, or offering for sale products that produce images utilizing light-emitting diodes (LED’s) and a liquid crystal display (LCD) that include display technology that infringes one or more claims of the ‘489 patent, including, but not limited to, LED televisions bearing model numbers XBR-65HX929 and XBR-55HX929.

13. Defendant Modia has infringed the ‘489 patent and, unless enjoined, will continue to do so by manufacturing, importing, using, selling, or offering for sale products that produce images utilizing light-emitting diodes (LED’s) and a liquid crystal display (LCD) that include

display technology that infringes one or more claims of the '489 patent, including but not limited to (i) Sharp products that produce images utilizing light-emitting diodes (LED's) and a liquid crystal display (LCD) that include display technology that infringes one or more claims of the '489 patent, including, but not limited to, Sharp LED televisions bearing model numbers LC-80LE632U, and LC-90LE745U and (ii) SEL products that produce images utilizing light-emitting diodes (LED's) and a liquid crystal display (LCD) that include display technology that infringes one or more claims of the '489 patent, including, but not limited to, SEL LED televisions bearing model numbers XBR-65HX929 and XBR-55HX929.

14. Plaintiff has been damaged by Defendants' infringement of the '489 patent and will suffer additional irreparable damage and impairment of the value of its patent rights unless Defendants are enjoined from continuing to infringe the '489 patent.

15. Plaintiff demands trial by jury of all issues relating to this claim.

WHEREFORE, Plaintiff prays for judgment as follows:

- A. A decree preliminarily and permanently enjoining Defendants, their officers, directors, employees, agents, and all persons in active concert with them, from infringing the '489 patent;
- B. Compensatory damages for Defendants' infringement of the '489 patent;
- C. Costs of suit and attorneys' fees;
- D. Pre-judgment interest; and
- E. For such other relief as justice requires.

Dated: May 17, 2013

Respectfully submitted,

By: /s/ Julien A. Adams

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