

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

Graphic Solutions Group, Inc.	)	
	)	
Plaintiff,	)	CIVIL ACTION No. _____
	)	
v.	)	
	)	
JT Led, Inc., and	)	<b>JURY TRIAL DEMANDED</b>
	)	
Xiao Ping Wang,	)	
	)	
Defendants.	)	

**COMPLAINT FOR DECLARATORY JUDGMENT  
OF NON-INFRINGEMENT AND INVALIDITY**

Plaintiff Graphic Solutions Group, Inc. for its complaint against JT Led, Inc., alleges as follows:

**THE PARTIES**

1. Plaintiff Graphic Solutions Group, Inc. (hereinafter "GSG"), is a company organized and existing under the laws of the State of Texas with its principal place of business located at 4601 Spring Valley Dallas, TX 75244.

2. Upon information and belief, Defendant JT Led, Inc. (hereinafter "JT"), is a corporation incorporated under the laws of the State of California and maintains its principal place of business at 3751 Merced Drive, 4 D/E, Riverside, California, 92503.

3. Upon information and belief, Defendant Xiao Ping Wang. (hereinafter "Wang") is an individual resident of the State of California who may be found at 17220 Newhope St. #127, Fountain Valley, California 92708.

**JURISDICTION AND VENUE**

4. This action is a Complaint for Declaratory Judgment under 28 U.S.C. §§ 2201 and 2202 with respect to an actual controversy over which this Court has jurisdiction under the patent laws of the United States of America, 35 U.S.C. § 101 et seq. and jurisdiction is predicated upon 28 U.S.C. §§ 1331 and 1338(a).

5. Venue is proper in this case under 28 U.S.C. §§ 1391(b) and 1391(c).

**COUNT I**

6. JT states that it is the owner as assignee of U.S. Patent No. 7,245,279 (“The ‘279 Patent”), a copy of which is attached hereto as Exhibit A, which is entitled “Linear LED Array.”

7. GSG and, on information and belief, defendants JT and Wang manufacture and market in this district and throughout the United States Light Emitting Diodes (“LEDs”).

8. On August 18, 2010, JT, through its counsel, wrote GSG accusing GSG’s product, the ZLight LED of “infringing the ‘279 Patent” and demanding that GSG “cease and desist” marketing and selling the ZLight LED, a copy of which letter is attached hereto. JT’s cease and desist letter creates a valid and justiciable controversy that continues to exist between JT and GSG. GSG desires a judicial declaration regarding the validity, enforceability and non-infringement by GSG of the ‘279 Patent and the parties’ respective rights and obligations concerning such patent, and such a determination is necessary and appropriate at this time.

9. Although the letter from counsel for JT asserts that JT is the “exclusive licensee” of the ‘279 patent, no license document has been provided and there is no assertion that any license empowers JT to file the threatened suit on the ‘279 patent. Defendant Wang is the last recorded assignee of the ‘279 patent at the United States Patent and Trademark Office, see Assignment Records, attached hereto as Exhibit B.

10. No product made, used, sold, offered for sale or imported by GSG infringes any valid claim of the ‘279 patent.

11. GSG does not induce others to infringe or contribute to any actions of others that infringe any valid claim of the '279 patent.

12. All claims of the '279 are invalid for failure to meet the statutory requirements set forth in 35 U.S.C. § 101 et seq.

**PRAYER FOR RELIEF**

13. GSG respectfully requests that the court enter judgment:

- (a) Declaring that GSG's ZLight LED does not infringe the '279 Patent;
- (b) Declaring that no GSG product infringes the '279 patent;
- (c) Declaring that the asserted claims of the '279 patent are invalid;
- (d) Declaring that the '279 is unenforceable;
- (e) Declaring that defendants JT and Wang are without right or authority to maintain or threaten suit against GSG;
- (f) Should this case be found exceptional under the law, that GSG be awarded all of its costs and attorney's fees in this action pursuant to 35 U.S.C. § 285; and
- (g) Granting such other and further relief as the court deems just and proper.

DEMAND FOR JURY TRIAL – GSG hereby demands a jury trial on all issues.

Respectfully submitted,

HUSCH BLACKWELL SANDERS LLP

By: /s/ Denyse L. Jones  
Denyse L. Jones, Esq.  
Texas Bar No. 24032476  
Robert C. Haldiman, Esq. (#MO 32,993)  
190 Carondelet Plaza, Suite 600  
St. Louis, Missouri 63105  
Phone: (314) 480-1500  
Fax: (314) 480-1505  
[Denyse.Jones@huschblackwell.com](mailto:Denyse.Jones@huschblackwell.com)  
[Robert.Haldiman@huschblackwell.com](mailto:Robert.Haldiman@huschblackwell.com)

**Attorneys for Plaintiff Graphic Solutions Group, Inc.**