

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436

In the Matter of

CERTAIN DIGITAL TELEVISIONS AND
COMPONENTS THEREOF

Investigation No. 337-TA-_____

COMPLAINT OF LG ELECTRONICS, INC.
UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED

COMPLAINANT

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- B. Prosecution History of the '906 Patent (four copies)
- C. Prosecution History of the '233 Patent (four copies)
- D. References Mentioned in the Prosecution Histories of the RE '070, '906 and '233 Patents (four copies each)

I. INTRODUCTION

1.1 LG Electronics, Inc. (“LGE” or “Complainant”) requests that the United States International Trade Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 337 (“Section 337”), to remedy the unlawful importation into the United States, sale for importation, and/or sale within the United States after importation by the owner, importer, or consignee (or agents thereof), of certain digital televisions and components thereof (collectively referred to as “the Accused Products”) that infringe valid and enforceable United States patents owned by LGE.

1.2 Proposed respondents Vizio, Inc. (“Vizio”) and AmTRAN Technology Co., Ltd. (“AmTRAN Tech”) and AmTRAN Logistics, Inc. (“ALI”) (AmTRAN Tech and ALI collectively, “AmTRAN”) have engaged in unfair acts in violation of Section 337 through and in connection with the unlicensed importation into the United States, sale for importation, and/or sale within the United States after importation of Accused Products that infringe one or more claims of United States Reissue Patent No. 37,070 (“the RE ’070 patent”), United States Patent No. 6,785,906 (“the ’906 patent”) and United States Patent No. 6,598,233 (“the ’233 patent”) (collectively, “the patents-in-suit” or “the Asserted Patents”).

1.3 LGE asserts that the Accused Products directly infringe, contributorily infringe, and/or induce the infringement of at least claims 1, 4-9, 12-14, 17-30 of the RE ’070 patent, claims 1-20 and 22-26 of the ’906 patent and claims 1-25 of the ’233 patent (collectively, “the Asserted Claims”).

1.4 Certified copies of the RE ’070, ’906 and ’233 patents accompany this Complaint as **Exhibits 1-3**, respectively. LGE owns by assignment the entire right, title, and interest in and to these patents. A certified copy of each of the recorded assignments accompanies this Complaint as **Exhibit 4**.

1.5 As required by Section 337(a)(2) and defined in Section 337(a)(3), an industry in the United States exists relating to articles covered by the Asserted Patents.

1.6 LGE seeks a permanent exclusion order, pursuant to Section 337(d), excluding from entry into the United States Vizio's Accused Products that infringe one or more claims of the Asserted Patents. LGE also seeks permanent cease and desist orders, pursuant to Section 337(f), directing Vizio to cease and desist from the importation, marketing, advertising, demonstrating, installing, servicing, repairing, and warehousing inventory of such Accused Products for distribution, sale and/or use in the United States.

1.7 LGE also seeks a permanent exclusion order, pursuant to Section 337(d), excluding from entry into the United States Accused Products manufactured, assembled, and/or imported by AmTRAN that infringe one or more claims of the Asserted Patents. LGE also seeks permanent cease and desist orders, pursuant to Section 337(f), directing AmTRAN to cease and desist from the importation, marketing, advertising, demonstrating, installing, servicing, repairing, and warehousing inventory of such Accused Products for distribution, sale, and/or use in the United States.

II. COMPLAINANT

2.1 Complainant LGE is a corporation organized under the laws of the Country of Korea, having its principal place of business at LG Twin Towers, 20, Yeouido-dong, Yeongdeungpo-gu, Seoul 150-721, Korea.

2.2 LGE is a global leader and technological innovator. LGE designs, develops, and sells a wide-range of high-technology products, including mobile communications devices, televisions, consumer electronics, and home appliances. Founded in 1958, LGE has grown substantially as a result of its innovation. LGE has invested billions of dollars in research and development. In 2009 alone, LGE invested 2 billion dollars in research and development. LGE,

and its affiliates, now employ approximately 84,000 people throughout the world, including 17,000 engineers to develop LGE's next generation of technology. To protect its investment, LGE seeks patent protection, and owns approximately 90,000 patents and patent applications. Additional information about LGE can be obtained from LGE's website (<http://www.lg.com/us/about-lg/index.jsp>).

2.3 Consumers have recognized LGE's innovation. LGE is the world's second largest supplier of flat panel TVs—it sold 19.5 million LCD and plasma televisions worldwide in 2009.

2.4 Specifically, in relation to this action, LGE designs, develops, markets, and sells digital televisions. In the United States, LGE has made significant investments in plants and equipment, significant employment of labor and capital, and substantial investment in the exploitation of the patents, including engineering, research and development, and licensing. These activities provide the foundation for LGE's domestic industry.

III. PROPOSED RESPONDENTS

A. Vizio

3.1 On information and belief, proposed Respondent Vizio is a California corporation with its principal place of business at 39 Tesla, Irvine, CA 92618. Vizio sells LCD and plasma display digital televisions in the United States. *See Exhibit 5*. On information and belief, these digital televisions are manufactured, assembled, and/or packaged and tested outside of the United States by at least AmTRAN Technology. *See Exhibit 6*. On information and belief, Vizio and/or others then import, sell for importation, or sell after importation the accused digital televisions and components thereof into the United States on behalf of Vizio.

B. AmTRAN

1. AmTRAN Technology Co., Ltd.

3.2 On information and belief, proposed Respondent AmTRAN Technology is a corporation organized under the laws of Taiwan. AmTRAN Technology's principal place of business is at 17f, 268, Lien Cheng Rd., Chungho City, Taipei, 23553, Taiwan. *See Exhibit 6.* On information and belief, AmTRAN Technology makes and/or purchases for importation LCD and plasma digital televisions for Vizio. *See id.* On information and belief, these digital televisions are manufactured, assembled, and/or packaged and tested outside of the United States. On information and belief, AmTRAN Technology and/or others then import, sell for importation, or sell after importation the accused digital televisions and components thereof into the United States, and the accused digital televisions are transferred to Vizio. On information and belief, certain accused digital televisions and components thereof manufactured and/or imported by AmTRAN are ultimately sold in the United States by Vizio.

2. AmTRAN Logistics, Inc.

3.3 On information and belief, proposed Respondent AmTRAN Logistics is a corporation organized under the laws of California. AmTRAN Logistics' principal place of business is at 9531 Irvine Center Dr., Irvine, CA 92618-4654. On information and belief, AmTRAN Logistics is a wholly-owned subsidiary of AmTRAN Technology. On information and belief, AmTRAN Logistics is responsible for the importation, sale for importation, or sale after importation of LCD and plasma digital televisions to the United States for AmTRAN Technology, including importation of such digital televisions for the benefit of Vizio. *See Exhibit 7.*

IV. THE TECHNOLOGY AND PRODUCTS AT ISSUE

4.1 The general technology at issue involves signal processing in digital televisions. As discussed below, LGE holds patents addressed to certain elements of digital television operation. For example, one of the Asserted Patents, the RE '070 patent, relates to technology for sampling signals used in the circuitry for digital televisions. Another of the Asserted Patents, the '906 patent, relates to technology used in digital televisions capable of processing internet content. The remaining Asserted Patent, the '233 patent, relates to technology used in channel switching.

V. THE ASSERTED PATENTS

5.1 At issue in this investigation is the proposed Respondents' infringement of three United States patents: the RE '070 patent, the '906 patent and the '233 patent. LGE overviews each patent below.

A. The RE '070 Patent

1. Identification of the Patent and Ownership by LGE

5.2 The RE '070 patent is titled "High Definition Television Receiver" and issued on February 27, 2001. The RE '070 patent issued from U.S. Patent Application Serial No. 09/249,497, filed on February 12, 1999, and is a reissue of U.S. Patent No. 5,604,541, which issued from U.S. Patent Application Serial No. 08/556,338, filed on November 13, 1995. The RE '070 patent claims priority to Korean Patent Application No. 94-29837, filed November 14, 1994. LGE is the assignee of all rights, title, and interest in the invention ultimately disclosed and claimed in the RE '070 patent by the inventors, Dae-Jin Kim, Key H. Kim, Hee B. Park, Jung S. Park, and Yung G. Kim. *See Exhibit 4.* The RE '070 patent is valid, enforceable, and is currently in full force and effect.

5.3 Pursuant to Rule 210.12(c) of the Commission's Rules of Practice and Procedure, this Complaint is accompanied by **Appendices A and D**. **Appendix A** contains a certified copy and three additional copies of the prosecution history of the RE '070 patent, and **Appendix D** contains four copies of each reference mentioned in that prosecution history.

2. Non-Technical Description of the Patented Invention¹

5.4 The RE '070 patent generally discloses a television receiver apparatus having an improved symbol timing restoring circuit. *See Exhibit 1* at Abstract. In modern digital communications, symbol timing restoration is critical for reliable data detection. The objective of symbol timing restoration is to find the best time to sample the received signal. Timing restoring circuitry generally detects and compensates for a timing error in the received signal and outputs the timing restored signal to subsequent signal processing circuitry. Relevant to this case, the RE '070 patent discloses and claims sampling signals used in the circuitry of digital televisions. The sampling disclosed in the RE '070 patent improves the symbol timing restoring circuitry used in digital televisions. *See, e.g., id.* at 3:29-4:7.

3. Foreign Counterparts to the RE '070 Patent

5.5 The RE '070 patent has one foreign counterpart, Korean Patent App. No. 94-29837A, filed November 14, 1995, from which the RE '070 patent claims priority. No other foreign patents or patent applications corresponding to the RE '070 patent have been filed, abandoned, withdrawn, or rejected.

¹ The contents of this Complaint, including this section (*i.e.*, "Non-Technical Description of the Patented Invention"), do not and are not intended to construe either the specification or the claims of any Asserted Patent.

B. The '906 Patent

1. Identification of the Patent and Ownership by LGE

5.6 The '906 patent is titled "Polling Internet Module of Web TV," and issued on August 31, 2004. The '906 patent issued from U.S. Patent Application Serial No. 09/551,410, filed on April 18, 2000, which is a continuation of U.S. Patent Application Serial No. 08/787,831, filed on January 23, 1997, now U.S. Patent No. 6,097,383. LGE is the assignee of all rights, title, and interest in the invention ultimately disclosed and claimed in the '906 patent by the inventors, Kevin J. Gaughan and Thomas J. Zato. *See Exhibit 4.* The '906 patent is valid, enforceable, and is currently in full force and effect.

5.7 Pursuant to Rule 210.12(c) of the Commission's Rules of Practice and Procedure, this Complaint is accompanied by **Appendices B and D**. **Appendix B** contains a certified copy and three additional copies of the prosecution history of the '906 patent, and **Appendix D** contains four copies of each reference mentioned in that prosecution history.

2. Non-Technical Description of the Patented Invention

5.8 The '906 patent generally relates to a web television, *i.e.*, a television capable of processing internet content. Relevant to this case, the '906 patent discloses and claims a communication technique between a television controller and an internet module in which the television controller polls the internet module and the internet module responds to the poll by providing information to the television controller. *See Exhibit 2* at 1:18-24.

3. Foreign Counterparts to the '906 Patent

5.9 The '906 patent has no foreign counterparts, and no foreign patents or patent applications corresponding to the '906 patent have been filed, abandoned, withdrawn, or rejected.

C. The '233 Patent

1. Identification of the Patent and Ownership by LGE

5.10 The '233 patent is titled "Channel Control Apparatus of Digital Television and Method Thereof," and issued on July 22, 2003. The '233 patent issued from U.S. Patent Application Serial No. 09/679,637, filed on October 5, 2000. The '233 patent claims priority to Korean Patent Application No. 1999-43062, filed October 6, 1999. LGE is the assignee of all rights, title, and interest in the invention ultimately disclosed and claimed in the '233 patent by the inventor, Kyung Rok Choi. *See Exhibit 4.* The '233 patent is valid, enforceable, and is currently in full force and effect.

5.11 Pursuant to Rule 210.12(c) of the Commission's Rules of Practice and Procedure, this Complaint is accompanied by **Appendices C and D**. **Appendix C** contains a certified copy and three additional copies of the prosecution history of the '233 patent, and **Appendix D** contains four copies of each reference mentioned in that prosecution history.

2. Non-Technical Description of the Patented Invention

5.12 The '233 patent generally relates to channel switching in a digital television. **Exhibit 3** at Abstract. Relevant to this case, the '233 patent discloses and claims a technique for reducing the time required for channel switching using packet identifiers ("PIDs") of a video signal and an audio signal of a digital television channel. *Id.*

3. Foreign Counterparts to the '233 Patent

5.13 The foreign counterparts to the '233 patent are listed in **Exhibit 8**. No other foreign patents or patent applications corresponding to the '233 patent have been filed, abandoned, withdrawn, or rejected.

VI. UNLAWFUL AND UNFAIR ACTS OF PROPOSED RESPONDENTS

6.1 Upon information and belief, Vizio's Accused Products directly infringe, contributorily infringe, and/or induce the infringement of at least: claims 1, 4-9, 12-14, 17-30 of the RE '070 patent, claims 1-20 and 22-26 of the '906 patent and claims 1-25 of the '233 patent. Upon information and belief, components of those same products (*e.g.*, the Vizio Accused Products) also directly infringe, contributorily infringe, and/or induce infringement of those claims.

6.2 Upon information and belief, AmTRAN is the manufacturer, purchaser for importation, and/or importer of certain accused products that directly infringe, contributorily infringe, and/or induce the infringement of at least: claims 1, 4-9, 12-14, 17-30 of the RE '070 patent, claims 1-20 and 22-26 of the '906 patent and claims 1-25 of the '233 patent. Upon information and belief, components of those same products (*e.g.*, the Accused Products that are manufactured, purchased for importation, and/or imported by AmTRAN) also directly infringe, contributorily infringe, and/or induce infringement of those claims.

A. Vizio's Unlawful and Unfair Acts

6.3 On information and belief, the accused Vizio products are manufactured, assembled, packaged and tested, and/or purchased for importation overseas, specifically, at least in China. The Accused Products are then imported into the United States, sold for importation, and/or sold within the United States after importation by or on behalf of Vizio. *See Exhibit 9.* Discovery may reveal that Vizio infringes additional claims of the Asserted Patents.

6.4 On information and belief, and by way of example, Vizio's SV422XVT digital televisions directly infringe, contributorily infringe, and/or induce infringement of the Asserted Claims. On information and belief, and by way of example, the representative Vizio SV422XVT televisions also directly infringe, contributorily infringe, and/or induce infringement of the

Asserted Claims. Photographs of a representative Vizio SV422XVT digital television are attached to this Complaint as **Exhibit 10**. A copy of the user manual for the representative Vizio SV422XVT digital television is attached to this Complaint as **Exhibit 11**. Claim charts demonstrating how exemplary Accused Products infringe the asserted independent claims of the Asserted Patents—claims 1, 4, 13 and 26 of the RE '070 patent, claim 1 of the '906 patent and claims 1, 5, 7, 10, 15 and 21 of the '233 patent—are attached to this Complaint as **Confidential Exhibit 12, Exhibit 13 and Confidential Exhibit 14**, respectively. Further discovery may reveal additional infringing Vizio products and/or models.

B. AmTRAN's Unlawful and Unfair Acts

6.5 On information and belief, certain accused Vizio products are manufactured, assembled, packaged and tested, and/or purchased for importation overseas, specifically, at least in China, by AmTRAN. *See Exhibit 6, 7*. The Accused Products are then imported into the United States, sold for importation, and/or sold within the United States after importation by AmTRAN for or on behalf of Vizio. *See Exhibit 9*. Discovery may reveal that AmTRAN infringes additional claims of the Asserted Patents.

6.6 On information and belief, and by way of example, Vizio's SV422XVT digital televisions are manufactured and imported by AmTRAN and directly infringe, contributorily infringe, and/or induce infringement of the Asserted Claims. On information and belief, and by way of example, the representative Vizio SV422XVT digital televisions also directly infringe, contributorily infringe, and/or induce infringement of the Asserted Claims. Photographs of the representative Vizio SV422XVT digital television are attached to this Complaint as **Exhibit 10**. A copy of the user manual for the representative Vizio SV422XVT digital television is attached to this Complaint as **Exhibit 11**. Claim charts demonstrating how exemplary Accused Products infringe the asserted independent claims of the Asserted Patents—claims 1, 4, 13 and 26 of the

RE '070 patent, claim 1 of the '906 and claims 1, 5, 7, 10 15 and 21 of the '233 patent—are attached to this Complaint as **Confidential Exhibit 12**, **Exhibit 13** and **Confidential Exhibit 14**, respectively. Further discovery may reveal additional infringing AmTRAN products and/or models.

6.7 Vizio and AmTRAN have notice of their infringement of the RE '070, '906, and '233 patents. For example, at least Vizio has been on notice of its infringement of the RE '070, '906, and '233 patents since at least as early as March 31, 2008.

VII. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE

A. Specific Instances of Vizio's Unlawful and Unfair Acts

7.1 On information and belief, Vizio and others on its behalf manufacture the Accused Products at least in China, and then import them into the United States, sell them for importation into the United States, and/or sell them within the United States after importation. For example, attached **Exhibit 9** includes descriptions of offers for sale of the Vizio SV422XVT television on the samsclub.com website, walmart.com website and vizio.com website, which is controlled by Vizio.

7.2 For example, on or about August 24, 2010, LGE purchased a representative Accused Product in the United States. Specifically, LGE purchased a Vizio SV422XVT television in the United States that infringes each Asserted Claim of the Asserted Patents, as set forth above. Labels on the device indicate that the product was manufactured in China. Attached as part of **Exhibit 15** are photographs of the product packaging and a copy of the receipt for the Vizio SV422XVT digital television purchased by LGE reflecting the purchase of an Accused Product in the United States. The photographs of the Vizio SV422XVT television in **Exhibit 15** identify Vizio as the distributor of the Vizio SV422XVT.

7.3 The accused Vizio products are believed to fall within at least the following classifications of the Harmonized Tariff Schedules of the United States: 8528.72.7210 and 8528.72.7250. These classifications are intended for illustrative purposes only and are not intended to restrict the scope or type of Accused Product.

B. Specific Instances of AmTRAN's Unlawful and Unfair Acts

7.4 On information and belief, AmTRAN Technology or others on its behalf manufacture the Accused Products at least in China, and then import them into the United States, sell them for importation into the United States, and/or sell them within the United States after importation. For example, attached **Exhibit 9** includes descriptions of offers for sale of the Vizio SV422XVT television on the samsclub.com website, walmart.com website and vizio.com website, which is controlled by Vizio. On information and belief, AmTRAN is the manufacturer and supplier of various Vizio televisions, including the Vizio SV422XVT television. *See Exhibit 6, 7.*

7.5 For example, on or about August 24, 2010, LGE purchased representative Accused Products in the United States. Specifically, LGE purchased a Vizio SV422XVT digital television in the United States that infringes each Asserted Claim of the Asserted Patents, as set forth above. Labels on the device indicate that the product was manufactured in China. Attached as part of **Exhibit 15** are photographs of the product packaging and a copy of the receipt for the Vizio SV422XVT digital television purchased by LGE reflecting the purchase of an Accused Product in the United States. The photographs of the Vizio SV422XVT digital television in **Exhibit 15** identify Vizio as the distributor of the Vizio SV422XVT digital television. On information and belief, AmTRAN is the manufacturer and supplier of various Vizio televisions, including the Vizio SV422XVT digital television. *See Exhibit 6, 7.*

7.6 The accused AmTRAN products are believed to fall within at least the following classifications of the Harmonized Tariff Schedules of the United States: 8528.72.7210 and 8528.72.7250. These classifications are intended for illustrative purposes only and are not intended to restrict the scope or type of Accused Product.

VIII. LICENSEES

8.1 LGE has licensed one or more of the Asserted Patents. Pursuant to Rule 210.12 of the Commission's Rules, **Confidential Exhibit 17** provides a list of licensees.

IX. DOMESTIC INDUSTRY

9.1 A domestic industry exists as defined by 19 U.S.C. §§ 1337(a)(3)(A), (B), and (C) relating to significant investment in plant and equipment; significant employment of labor and capital; and substantial investment in the exploitation of the patents, including engineering, research and development, and licensing of LGE's domestic industry products. LGE's domestic industry products covered by the claims of the Asserted Patents include LGE's digital televisions.

A. Technical Prong

9.2 LGE sells in the United States digital televisions that practice at least one claim of each of the Asserted Patents. One exemplary LGE product, the LGE 42LH50 digital television, is covered by each of the Asserted Patents. This television is assembled in Mexico and is imported to the United States. A photograph of a 42LH50 digital television is attached as **Exhibit 18**. A copy of the owner's manual and service manual for the LGE 42LH50 digital television is attached as **Confidential Exhibit 19**. The LGE 42LH50 digital television incorporates a Broadcom system-on-chip ("SOC") having part number BCM 3549 and complies with ATSC Standards A/53 and A/65. A copy of ATSC Digital Television Standard A/53, Parts 1 - 6, 2007, and ATSC Standard A/65: Program and System Information Protocol for Terrestrial

Broadcast and Cable, April 14, 2009, are attached as **Exhibit 20**. A copy of a Product Brief for a Broadcom system-on-chip (“SOC”) having part number BCM 3549 is attached as **Exhibit 21**. Two declarations of LGE engineers describing the structure and operation of a certain Broadcom system-on-chip (“SOC”) as used in TVs, including LGE digital television 42LH50 digital television, are attached as **Confidential Exhibits 22 and 25**. Claim charts demonstrating how the LGE 42LH50 digital television practices the Asserted Patents are attached as **Exhibit 23, Exhibit 24 and Exhibit 26**.

B. Economic Prong

9.3 LGE conducts significant domestic industry activities in the United States relating to products practicing the Asserted Patents. These activities include LGE’s investment in plant and equipment, employment of labor and capital, and substantial investment in the exploitation of the Asserted Patents, as well as the investments in these activities by its related entities LG Electronics U.S.A., Inc. (“LGEUS”) and LG Electronics Alabama, Inc. (“LGEAI”). *See Confidential Exhibit 27*.

9.4 LGE has made and continues to make significant investment in plant facilities and equipment in the United States dedicated to the service and engineering of products covered by the Asserted Patents. The plant facilities and equipment used in connection with these activities are located in Huntsville, Alabama, and Rancho Cucamonga, California. A portion of LGE’s investment in plant and equipment is set forth in **Confidential Exhibit 27**.

9.5 LGE has employed and continues to employ a significant number of employees in the above-mentioned facilities that devote substantial man-hours towards product support, testing and quality management, and warranty and repair services for products covered by the Asserted Patents. **Confidential Exhibit 27** describes this labor investment.

9.6 LGE has invested and continues to invest significant capital in its facilities towards product support, testing and quality management, and warranty and repair services for products covered by the Asserted Patents. **Confidential Exhibit 27** describes the capital LGE has expended towards these activities.

9.7 LGE has also invested substantially in the exploitation of the patents-in-suit through the activities described above. **Confidential Exhibit 27** describes this investment.

X. RELATED LITIGATION

10.1 Contemporaneously with the filing of the Complaint in this case (September 15, 2010), LGE filed suit in the U.S. District Court for the Eastern District of Texas asserting that Vizio and AmTRAN infringe the RE '070, '906 and '233 patents.

XI. REQUESTED RELIEF

11.1 WHEREFORE, by reason of the foregoing, LGE requests that the United States International Trade Commission:

- (a) Institute an immediate investigation, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, with respect to violations of Section 337 based on the proposed Respondents' unlawful importation into the United States, sale for importation, and/or sale within the United States after importation of certain digital televisions and components thereof that infringe one or more claims of United States Reissue Patent No. RE 37,070, United States Patent No. 6,785,906 and United States Patent No. 6,598,233;
- (b) Schedule and conduct a hearing on the unlawful acts and, following the hearing, determine that there has been a violation of Section 337;
- (c) Issue a permanent exclusion order, pursuant to Section 337(d) of the Tariff Act of 1930, as amended, excluding from entry into the United States all of the proposed

respondents' digital televisions and components thereof that infringe one or more claims of United States Reissue Patent No. RE 37,070, United States Patent No. 6,785,906 and United States Patent No. 6,598,233;

(d) Issue permanent cease and desist orders, pursuant to Section 337(f) of the Tariff Act of 1930, as amended, directing each of the proposed respondents to cease and desist from the importation, marketing, advertising, demonstrating, installing, repairing, servicing, warehousing inventory for distribution, sale and use of certain digital televisions and components thereof that infringe one or more claims of United States Reissue Patent No. RE 37,070, United States Patent No. 6,785,906 and United States Patent No. 6,598,233; and

(e) Grant such other and further relief as the Commission deems just and proper based on the facts determined by the investigation and the authority of the Commission.

Respectfully submitted,

FISH & RICHARDSON P.C.



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Counsel for Complainant
LG Electronics, Inc.

Dated: September 15, 2010

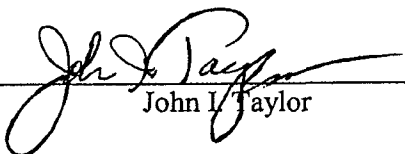
VERIFICATION

I, John I. Taylor, declare, in accordance with 19 C.F.R. §§ 210.4 and 210.12(a), under penalty of perjury, that the following statements are true:

1. I, John I. Taylor, am a vice president at LG Electronics USA, Inc., and am duly authorized to sign this Complaint on behalf of Complainant LG Electronics, Inc. ("LGE");
2. I have read the foregoing Complaint;
3. To the best of my knowledge, information, and belief, based upon reasonable inquiry, the foregoing Complaint is well-founded in fact and is warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;
4. The allegations or other factual contentions have evidentiary support or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery, and;

The foregoing Complaint is not being filed for any improper purpose, such as to harass or cause unnecessary delay or needless increase in the cost of litigation.

Executed this 14th day of September, 2010.



John I. Taylor