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10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF CALIFORNIA

12 DR. CHEN-JEAN CHOU,

13 *Plaintiff,*

14 SONY CORPORATION, SONY
15 CORPORATION OF AMERICA,
16 AND SONY ELECTRONICS, INC.,

17 *Defendants.*

CASE NO. '13CV1661 WQH-KSC

ORIGINAL COMPLAINT FOR
PATENT INFRINGEMENT

DEMAND FOR JURY TRIAL

1 Plaintiff Dr. Chen-Jean Chou (hereinafter “Dr. Chou” or “Plaintiff”)
2 by and through its undersigned counsel, files this Original Complaint against
3 Defendants Sony Corporation, Sony Corporation of America, and Sony
4 Electronics, Inc. (collectively, “Sony” or “Defendants”) as follows:

5 **THE PARTIES**

6 1. Plaintiff Dr. Chen-Jean Chou has an address of 729 San Cristoval
7 Ct., Morgan Hill, CA 95037.

8 2. Upon information and belief, Defendant Sony Corporation is a
9 Japanese corporation with its principal place of business at 1-7-1 Konan,
10 Minato-ku, Tokyo 108-0075, Japan. Upon information and belief, Sony
11 Corporation may be served at 1-7-1 Konan, Minato-ku, Tokyo 108-0075, Japan,
12 via an officer, a managing or general agent, or any other agent authorized by
13 appointment or by law to receive service of process.

14 3. Upon information and belief, Defendant Sony Corporation of
15 America is a New York corporation with its principal place of business at 550
16 Madison Avenue, 27th Floor, New York, NY 10022. Sony Corporation of
17 America has appointed CSC – Lawyers Incorporating Service, 2710 Gateway
18 Oaks Dr., Suite 150N, Sacramento, CA 95833 as its agent for service of process.
19 Upon information and belief, Sony Corporation of America is a wholly owned
20 subsidiary of Sony Corporation.

21 4. Upon information and belief, Defendant Sony Electronics Inc. is a
22 Delaware corporation with its principal place of business at 16530 Via Esprillo,
23 San Diego, CA, 92127. Upon information and belief, Sony Electronics Inc. may
24 be served at CSC – Lawyers Incorporating Service, 2710 Gateway Oaks Dr.,
25 Suite 150N, Sacramento, CA 95833 as its agent for service of process. Upon
26 information and belief, Sony Electronics Inc. is a subsidiary of Sony
27 Corporation of America.
28

1 **JURISDICTION AND VENUE**

2 5. This action arises under the Patent Laws of the United States, 35
3 U.S.C. § 1, et seq., including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This
4 Court has subject matter jurisdiction over this case for patent infringement under
5 28 U.S.C. §§ 1331 and 1338(a).

6 6. This Court has personal jurisdiction over each Defendant. Each
7 Defendant has conducted and does conduct business within the state of
8 California. Each Defendant, directly or through intermediaries (including
9 distributors, retailers, and others), ships, distributes, offers for sale, and/or sells
10 its products in the United States, the State of California, and the Southern
11 District of California. Each Defendant has purposefully and voluntarily placed
12 one or more of its infringing products into the stream of commerce with the
13 expectation that they will be purchased by consumers in the Southern District of
14 California. Each Defendant has committed acts of patent infringement within the
15 State of California and, more particularly, within the Southern District of
16 California.

17 7. Venue is proper in this Court under 28 U.S.C. §§ 1391(b), (c), and
18 (d), as well as 28 U.S.C. § 1400(b), in that, upon information and belief, each
19 Defendant has committed acts within this judicial District giving rise to this
20 action and does business in this District, including using, selling, offering for
21 sale, providing service and support for their respective customers, and/or
22 importing infringing products in and/or into this District.

23 **COUNT I**

24 **PATENT INFRINGEMENT OF U.S. PATENT NO. 7,612,843**

25 8. Plaintiff repeats and re-alleges each and every allegation of
26 paragraphs 1-7 as though fully set forth herein.
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1 Dated: July 16, 2013
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GCA LAW PARTNERS LLP

3 /s/ Jill F. Kopeikin
4 Jill F. Kopeikin

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