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Counsel for Plaintiffs Furuno Electric Co., Ltd. and Furuno U.S.A., Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

FURUNO ELECTRIC CO., LTD. and
FURUNO U.S.A., INC.

Plaintiff,

vs.

GARMIN LTD., GARMIN
INTERNATIONAL, INC., GARMIN
NORTH AMERICA, INC. and
GARMIN USA, INC.

Defendants.

Case No. _____

COMPLAINT FOR PATENT
INFRINGEMENT

JURY TRIAL DEMANDED

Plaintiffs Furuno Electric Co., Ltd. and Furuno U.S.A., Inc. file this complaint against Defendants Garmin Ltd., Garmin International, Inc., Garmin North America, Inc. and Garmin USA, Inc.:

THE PARTIES

1. Plaintiff Furuno Electric Co., Ltd. (“FEC”) is a Japanese corporation with a principal place of business at 9-52 Ashihara-cho, Nishinomiya City, Hyogo, 662-8580 Japan.

2. Plaintiff Furuno U.S.A. (“FUSA”) is a Washington corporation with its principal place of business at 4400 N.W. Pacific Rim Boulevard, Camas, Washington 98607.

3. Upon information and belief, Defendant Garmin Ltd. is a company organized and existing under the laws of Switzerland with its principal place of business at Mühlentalstrasse 2, 8200 Schaffhausen, Switzerland.

4. Upon information and belief, Defendant Garmin International, Inc. (“Garmin International”) is a Kansas corporation with its principal place of business at 1200 East 151st Street, Olathe, Kansas 66062.

5. Upon information and belief, Defendant Garmin North America, Inc. (“Garmin NA”) is a Kansas corporation with its principal place of business at 1200 East 151st Street, Olathe, Kansas 66062.

6. Upon information and belief, Defendant Garmin USA, Inc. (“Garmin USA”) is a Kansas corporation with its principal place of business at 1200 East 151st Street, Olathe, Kansas 66062.

JURISDICTION AND VENUE

7. This lawsuit is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 et seq. This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338.

8. Garmin Ltd., Garmin International, Garmin NA and Garmin USA (collectively, “Garmin”) are subject to personal jurisdiction in this Court because, on

information and belief, they do and have done substantial business in this judicial District, including: (i) committing acts of patent infringement related to the patents-in-suit, as defined below, and/or contributing to or inducing acts of patent infringement related to the patents-in-suit, as defined below, by others in this District and elsewhere in the United States; and (ii) regularly doing business or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from products and/or services provided to individuals in this District.

9. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b) because Garmin regularly conducts business in this judicial district and/or because certain of the acts complained of herein occurred in this judicial district.

10. FEC's subsidiary in the United States is FUSA. FUSA's activities, which include sales, maintenance and repair of FEC products, are essential to FEC's operations in the United States. Accordingly, FUSA's proximity to this district makes it a convenient forum.

THE PATENTS-IN-SUIT

11. On July 4, 2000, the USPTO issued U.S. Patent No. 6,084,565 titled "Image Monitoring Apparatus" (hereinafter "the '565 patent"). A true and correct copy of the '565 patent is attached hereto as Exhibit A.

12. On July 23, 2002, the USPTO issued U.S. Patent No. 6,424,292 titled "Radar Device and the Like" (hereinafter "the '292 patent"). A true and correct copy of the '292 patent is attached hereto as Exhibit B.

13. On January 9, 2007, the USPTO issued U.S. Patent No. 7,161,561 titled "Display System" (hereinafter "the '561 patent"). A true and correct copy of the '561 patent is attached hereto as Exhibit C.

14. On August 3, 2010, the USPTO issued U.S. Patent No. 7,768,447 titled "Radar Apparatus and the Like" (hereinafter "the '447 patent"). A true and correct copy of the '447 patent is attached hereto as Exhibit D.

15. The '565 patent, '292 patent, '561 patent, and '447 patent are henceforth referred to as the “patents-in-suit.”

16. FEC is the owner of all right, title, and interest in and to each of the patents-in-suit with full and exclusive right to bring suit to enforce this patent, including the right to recover for past infringement.

COUNT I

INFRINGEMENT OF THE '565 PATENT

17. FEC and FUSA (collectively “Furuno”), realleges and incorporates herein the allegations of the preceding paragraphs of this Complaint as if fully set forth herein.

18. Upon information and belief, in violation of 35 U.S.C. § 271, Garmin has infringed and is continuing to infringe, literally and/or under the doctrine of equivalents, the '565 patent by practicing claims 16-20 of the '565 patent in the manufacture, use, offering for sale, sale, and/or importation of aviation, marine and on-road navigation and/or tracking products, including, but not limited to the nüvi 2457LMT, aera 500 and GPSMAP 7212/7215 products. Furuno reserves the right to contend that additional aviation, marine and on-road navigation and/or tracking products manufactured by Garmin infringe the '565 patent.

19. Upon information and belief, in violation of 35 U.S.C. § 271, Garmin has infringed and is continuing to infringe the '565 patent by contributing to and/or actively inducing the infringement by others of claims 16-20 of the '565 patent by the manufacture, use, offering for sale, sale, and/or importation of aviation, marine and on-road navigation and/or tracking products, including, but not limited to the nüvi 2457LMT, aera 500 and GPSMAP 7212/7215 products, which are especially adapted for infringing the '565 patent. Furuno reserves the right to contend that additional aviation, marine and on-road navigation and/or tracking products manufactured by Garmin indirectly infringe the '565 patent. Upon information and belief, Garmin further actively induces others, including users of aviation, marine and on-road navigation and/or tracking products manufactured by Garmin, to infringe

the '565 patent through the sale of those products to customers along with directions, demonstrations, guides, and/or manuals that encourage the infringing use of those products.

20. Upon information and belief, Garmin has continued to manufacture, use, import, offer for sale, or sell products infringing the '565 patent with knowledge of or willful blindness to the fact that its actions will induce Garmin's customers and end users to infringe the '565 patent. When used for their intended purpose, the accused products perform all of the steps of one or more method claims of the '565 patent. Garmin has induced and continues to induce others to infringe the '565 patent in violation of 35 U.S.C. § 271 by encouraging and facilitating others to practice the '565 patent's inventions for independently displaying images on a screen that are aligned independently with intent that those performing the acts infringe the '565 patent.

21. For example, Garmin incorporates software into the Garmin GPSMAP 7215 that enable an end user to infringe the '565 patent by using a "Combinations" screen in which two or more images of navigation charts and radar displays are displayed with different orientations and zoom levels. Moreover, Garmin publishes information about infringing aspects of the GPSMAP 7215 and teaches its customers and end users how to display two or more images of navigation charts and radar displays in an infringing manner. In particular, the owner's manual for the GPSMAP 7215 provides specific instructions for displaying two or more images of navigation charts and radar displays on one screen, setting the orientations of each displayed image, and setting the zoom level of each displayed image. The other Garmin products infringing the '565 patent similarly incorporate software enabling infringement and are provided with manuals instructing end users how to operate the product in an infringing manner. By incorporating software that enables infringement into the Garmin products, publishing information about infringing aspects of the products, and teaching customers and end users how to use the products in an infringing manner, Garmin induces those customers and end users to infringe the '565 patent.

22. Garmin also contributes to the infringement of the '565 patent in violation of 35 U.S.C. § 271. Upon information and belief, Garmin knows that infringing components of the accused products are especially made or especially adapted for use in the infringement of the '565 patent. The accused products and the infringing components of these products, such as embedded software, are not staple articles or commodities of commerce suitable for substantial non-infringing use, and the infringing components of these products are a material part of the invention of the '565 patent. The products infringing the '565 patent contain infringing components, for example software enabling the independent display of multiple images on one screen that are aligned independently. These software components that Garmin provides are separable from Garmin's products, material to practicing the '565 patent's inventions for displaying two images independently on the same screen that are aligned independently, and have no substantial non-infringing use. Moreover, as explained above, Garmin publishes information about infringing aspects of its products that are practiced using the software components Garmin provides. Accordingly, Garmin is also contributing to the direct infringement of the '565 patent by the end users of these products.

23. Upon information and belief, Garmin knew or should have known its actions would cause direct infringement of the '565 patent and did so with intent to encourage direct infringement.

24. Upon information and belief, Garmin's infringement of '565 patent has been, and continues to be, knowing, deliberate, and intentional.

25. Upon information and belief, Garmin's acts of infringement of the '565 patent will continue after service of this complaint unless enjoined by the Court.

26. As a result of Garmin's infringement, Furuno has suffered and will suffer damages.

27. Furuno is entitled to recover from Garmin the damages sustained by Furuno as a result of Garmin's wrongful acts in an amount subject to proof at trial.

28. Unless Garmin is enjoined by this Court from continuing its infringement of the '565 patent, Furuno will suffer additional irreparable harm and impairment of the value of its patent rights. Furuno has no adequate remedy at law for these wrongs and injuries. Thus, Furuno is entitled to a preliminary and permanent injunction against further infringement.

COUNT II

INFRINGEMENT OF THE '292 PATENT

29. Furuno realleges and incorporates herein the allegations of the preceding paragraphs of this Complaint as if fully set forth herein.

30. Upon information and belief, in violation of 35 U.S.C. § 271, Garmin has infringed and is continuing to infringe, literally and/or under the doctrine of equivalents, the '292 patent by practicing claims 1-6 of the '292 patent in the manufacture, use, offering for sale, sale, and/or importation of marine navigation and/or tracking products including, but not limited to, GPSMAP 7212 and GPSMAP 7215 products. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Garmin infringe the '292 patent.

31. Upon information and belief, Garmin's infringement of the '292 patent has been, and continues to be, knowing, deliberate, and intentional.

32. Upon information and belief, Garmin's acts of infringement of the '292 patent will continue after service of this complaint unless enjoined by the Court.

33. As a result of Garmin's infringement, Furuno has suffered and will suffer damages.

34. Furuno is entitled to recover from Garmin the damages sustained by Furuno as a result of Garmin's wrongful acts in an amount subject to proof at trial.

35. Unless Garmin is enjoined by this Court from continuing its infringement of the '292 patent, Furuno will suffer additional irreparable harm and impairment of the value of its patent rights. Furuno has no adequate remedy at law for these wrongs and injuries.

Thus, Furuno is entitled to a preliminary and permanent injunction against further infringement.

COUNT III

INFRINGEMENT OF THE '561 PATENT

36. Furuno realleges and incorporates herein the allegations of the preceding paragraphs of this Complaint as if fully set forth herein.

37. Upon information and belief, in violation of 35 U.S.C. § 271, Garmin has infringed and is continuing to infringe, literally and/or under the doctrine of equivalents, the '561 patent by practicing at least claims 1-10, 12 and 14 of the '561 patent in the manufacture, use, offering for sale, sale, and/or importation of marine navigation and/or tracking products including, but not limited to, the GPSMAP 7212 and GPSMAP 7215 products. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Garmin infringe the '561 patent.

38. Upon information and belief, in violation of 35 U.S.C. § 271, Garmin has infringed and is continuing to infringe the '561 patent by contributing to and/or actively inducing the infringement by others of at least claims 1-10, 12 and 14 of the '561 patent by the manufacture, use, offering for sale, sale, and/or importation of components of the patented system disclosed in the '561 patent, including marine navigation and/or tracking products such as the GPSMAP 7212 and GPSMAP 7215 products, which are especially adapted for infringing the '561 patent. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Garmin indirectly infringe the '561 patent. Upon information and belief, Garmin further actively induces others, including users of marine navigation and/or tracking products manufactured by Garmin, to infringe the '561 patent through the sale of those products to customers along with directions, demonstrations, guides, and/or manuals that encourage the infringing use of those products.

39. Upon information and belief, Garmin has continued to manufacture, use, import, offer for sale, or sell products infringing the '561 patent with knowledge of or willful

blindness to the fact that its actions will induce Garmin's customers and end users to infringe the '561 patent. When used for their intended purpose, the accused products are an essential component of one or more display system claims of the '561 patent. Garmin has induced and continues to induce others to infringe the '561 patent in violation of 35 U.S.C. § 271 by encouraging and facilitating others to practice the '561 patent's inventions for display systems coupling together multiple display panels and measuring devices with selectors on the display panels to select signals from the measuring devices with intent that those systems infringe the '561 patent.

40. For example, the Garmin GPSMAP 7215 enables an end user to infringe the '561 patent by coupling the GPSMAP 7215 in combination with at least one other display panel and plural measuring devices. Moreover, Garmin publishes information about infringing aspects of the GPSMAP 7215 and teaches its customers and end users how to configure a display system that includes the GPSMAP 7215 with at least one other display panel and at least two measuring devices in an infringing manner. In particular, the installation manual for the GPSMAP 7215 provides specific instructions for coupling together the GPSMAP 7215 with at least one other display panel and at least two measuring devices where the selectors on the display panels can select signals from the measuring devices. The other Garmin products infringing the '561 patent can similarly be coupled in combination with at least one other display panel and plural measuring devices in an infringing manner. By coupling the Garmin products infringing the '561 patent in a manner that enables infringement, publishing information about infringing aspects of the products, and teaching customers and end users how to use the products in an infringing manner, Garmin induces those customers and end users to infringe the '561 patent.

41. Garmin also contributes to the infringement of the '561 patent in violation of 35 U.S.C. § 271. Upon information and belief, Garmin knows that infringing components of the products infringing the '561 patent are especially made or especially adapted for use in the infringement of the '561 patent. The infringing components of these products are not

staple articles or commodities of commerce suitable for substantial non-infringing use, and the infringing components of these products are a material part of the invention of the '561 patent. The Garmin products, such as the GPSMAP 7212 and the GPSMAP 7215, are infringing components of the invention of the '561 patent configured to be coupled together with other display devices and with multiple measuring devices where selectors on the display devices select signals from the measuring devices. These Garmin products are material to practicing the '561 patent's inventions for display systems coupling together multiple display devices and measuring devices with selectors on the display devices to select signals from the measuring devices, and have no substantial non-infringing use. Moreover, as explained above, Garmin publishes information about infringing aspects of its products that are practiced using the components Garmin provides. Accordingly, Garmin is also contributing to the direct infringement of the '561 patent by the end users of these products.

42. Upon information and belief, Garmin knew or should have known its actions would cause direct infringement of the '561 patent and did so with intent to encourage direct infringement.

43. Upon information and belief, Garmin's infringement of '561 patent has been, and continues to be, knowing, deliberate, and intentional.

44. Upon information and belief, Garmin's acts of infringement of the '561 patent will continue after service of this complaint unless enjoined by the Court.

45. As a result of Garmin's infringement, Furuno has suffered and will suffer damages.

46. Furuno is entitled to recover from Garmin the damages sustained by Furuno as a result of Garmin's wrongful acts in an amount subject to proof at trial.

47. Unless Garmin is enjoined by this Court from continuing its infringement of the '561 patent, Furuno will suffer additional irreparable harm and impairment of the value of its patent rights. Furuno has no adequate remedy at law for these wrongs and injuries.

Thus, Furuno is entitled to a preliminary and permanent injunction against further infringement.

COUNT IV

INFRINGEMENT OF THE '447 PATENT

48. Furuno realleges and incorporates herein the allegations of the preceding paragraphs of this Complaint as if fully set forth herein.

49. Upon information and belief, in violation of 35 U.S.C. § 271, Garmin has infringed and is continuing to infringe, literally and/or under the doctrine of equivalents, the '447 patent by practicing claims 1-25 of the '447 patent in the manufacture, use, offering for sale, sale, and/or importation of marine navigation and/or tracking products including, but not limited to, GPSMAP 7212 and GPSMAP 7215 products. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Garmin infringe the '447 patent.

50. Upon information and belief, in violation of 35 U.S.C. § 271, Garmin has infringed and is continuing to infringe claims 1-25 of the '447 patent by contributing to and/or actively inducing the infringement by others of the '447 patent by the manufacture, use, offering for sale, sale, and/or importation of marine navigation and/or tracking products including, but not limited to, GPSMAP 7212 and GPSMAP 7215 products, which are especially adapted for infringing the '447 patent. Furuno reserves its right to contend that additional marine navigation and/or tracking products manufactured by Garmin indirectly infringe the '447 patent. Upon information and belief, Garmin further actively induces others, including users of marine navigation and/or tracking products manufactured by Garmin, to infringe the '447 patent through the sale of those products to customers along with directions, demonstrations, guides, and/or manuals that encourage the infringing use of those products.

51. Upon information and belief, Garmin has continued to manufacture, use, import, offer for sale, or sell products infringing the '447 patent with knowledge of or willful blindness to the fact that its actions will induce Garmin's customers and end users to infringe the '447 patent. When used for their intended purpose, the accused products perform all of the steps of one or more method claims of the '447 patent. Garmin has induced and continues to induce others to infringe the '447 patent in violation of 35 U.S.C. § 271 by encouraging and facilitating others to practice the '447 patent's inventions for displaying sensed images such as radar images when a scale or range has changed with intent that those performing the acts infringe the '447 patent.

52. For example, Garmin incorporates software into the Garmin GPSMAP 7215 that enable an end user to infringe the '447 patent by computing changes to a displayed sensed image such as a radar image and to displayed additional information when a scale or range has changed, as well as transferring image data between areas while expanding or shrinking the image data when a scale or range has changed. Moreover, Garmin publishes information about infringing aspects of the GPSMAP 7215 and teaches its customers and end users how to change the scale or range of a sensed image that causes the GPSMAP 7215 to perform in an infringing manner. In particular, the owner's manual for the GPSMAP 7215 provides specific instructions for changing the range or scale of a sensed image, such as a radar image, which causes changes to the displayed sensed image and displayed additional information and causes the transfer of image data between areas while expanding or shrinking the image data. The other Garmin products infringing the '447 patent similarly incorporate software enabling infringement and are provided with manuals instructing end users how to operate the product in an infringing manner. By incorporating software that enables infringement into the Garmin products, publishing information about infringing aspects of the products, and teaching customers and end users how to use the products in an infringing manner, Garmin induces those customers and end users to infringe the '447 patent.

53. Garmin also contributes to the infringement of the '447 patent in violation of 35 U.S.C. § 271. Upon information and belief, Garmin knows that infringing components of the products infringing the '447 patent are especially made or especially adapted for use in the infringement of the '447 patent. The accused products and the infringing components of these products, such as embedded software, are not staple articles or commodities of commerce suitable for substantial non-infringing use, and the infringing components of these products are a material part of the invention of the '447 patent. The products infringing the '447 patent contain infringing components, for example software that causes changes to a displayed sensed image and displayed additional information and that transfers image data between areas while expanding or shrinking the image data when a scale or range has changed. These software components that Garmin provides are separable from Garmin's products, material to practicing the '447 patent's inventions for causing changes to a displayed sensed image and displayed additional information—and transferring image data between areas while expanding or shrinking the image data when a scale or range has changed—and have no substantial non-infringing use. Moreover, as explained above, Garmin publishes information about infringing aspects of its products that are practiced using the software components Garmin provides. Accordingly, Garmin is also contributing to the direct infringement of the '447 patent by the end users of these products.

54. Upon information and belief, Garmin knew or should have known its actions would cause direct infringement of the '447 patent and did so with intent to encourage direct infringement.

55. Upon information and belief, Garmin's infringement of '447 patent has been, and continues to be, knowing, deliberate, and intentional.

56. Upon information and belief, Garmin's acts of infringement of the '447 patent will continue after service of this complaint unless enjoined by the Court.

57. As a result of Garmin's infringement, Furuno has suffered and will suffer damages.

58. Furuno is entitled to recover from Garmin the damages sustained by Furuno as a result of Garmin's wrongful acts in an amount subject to proof at trial.

59. Unless Garmin is enjoined by this Court from continuing its infringement of the '447 patent, Furuno will suffer additional irreparable harm and impairment of the value of its patent rights. Furuno has no adequate remedy at law for these wrongs and injuries. Thus, Furuno is entitled to a preliminary and permanent injunction against further infringement.

PRAYER FOR RELIEF

WHEREFORE, Furuno prays for the following relief:

- (a) That Garmin be ordered to pay damages adequate to compensate Furuno for Garmin's infringement of each of the patents-in-suit pursuant to 35 U.S.C. § 284;
- (b) That Garmin be ordered to pay attorneys' fees pursuant to 35 U.S.C. § 285 for its infringement;
- (c) That Garmin, its officers, agents, servants, employees, and those persons acting in active concert or in participation with them be enjoined from further infringement pursuant to 35 U.S.C. § 283;
- (d) That Garmin be ordered to pay prejudgment interest;
- (e) That Garmin be ordered to pay all costs associated with this action; and
- (f) That Furuno be granted such other and additional relief as the Court deems just and proper.

Dated: September 23, 2013

Respectfully submitted,

/s/ Stephen J. Joncus

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*Counsel for Plaintiffs Furuno Electric Co., Ltd. and
Furuno U.S.A., Inc.*

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands a trial by jury as to all issues so triable.

Dated: September 23, 2013

Respectfully submitted,

/s/ Stephen J. Joncus

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