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6 Attorneys for Plaintiff Largan Precision Co.,  
Ltd.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

LARGAN PRECISION CO., LTD.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO.,  
LTD.; SAMSUNG ELECTRONICS  
AMERICA, INC.; and SAMSUNG  
TELECOMMUNICATIONS  
AMERICA, LLC,

Defendants.

Case No. '13CV2740 AJB NLS

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

1 Plaintiff Largan Precision Co., Ltd. (“Largan”) hereby pleads the following  
2 claims for patent infringement against Defendants Samsung Electronics Co., Ltd.  
3 (“SEC”); Samsung Electronics America, Inc. (“SEA”); and Samsung  
4 Telecommunications America, LLC (“STA”) (collectively, “Samsung”), and  
5 alleges as follows:

6 **PARTIES**

7 1. Plaintiff Largan is a Taiwanese corporation with its principal place of  
8 business located at No. 11, Jingke Road, Nantun District, Taichung City 40852,  
9 Taiwan. Largan is the owner of the patent rights at issue in this action.

10 2. On information and belief, Defendant Samsung Electronics Co., Ltd. is  
11 a Korean corporation with its principal offices at 1320-10, Seocho 2-dong, Seocho-  
12 gu, Seoul 137-857, South Korea. On information and belief, SEC designs,  
13 manufactures, and provides to the U.S. and world markets a wide range of products,  
14 including consumer electronics, computer components, and myriad mobile and  
15 entertainment products.

16 3. Samsung Electronics America, Inc. is a New York corporation with its  
17 principal place of business at 85 Challenger Road, Ridgefield Park, New Jersey  
18 07660. On information and belief, SEA is a subsidiary of SEC that markets, sells,  
19 or offers for sale a variety of consumer electronics, and provides operation services  
20 for other Samsung entities such as STA.

21 4. Samsung Telecommunications America, LLC is a Delaware limited  
22 liability company with its principal place of business at 1301 East Lookout Drive,  
23 Richardson, Texas 75081. On information and belief, STA is a subsidiary of SEC  
24 that markets, sells, and offers for sale a variety of personal and business  
25 communications devices in the United States, including mobile phones.  
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1 **JURISDICTION AND VENUE**

2 5. This is an action for patent infringement arising under the patent laws  
3 of the United States, 35 U.S.C. § 1 *et seq.*, including but not limited to 35 U.S.C.  
4 § 271.

5 6. The Court has subject matter jurisdiction over this action under 28  
6 U.S.C. §§ 1331 and 1338(a).

7 7. This Court has personal jurisdiction over Samsung because, among  
8 other things, Samsung has committed, aided, abetted, contributed to, and/or  
9 participated in the commission of patent infringement in this judicial district and  
10 elsewhere that led to foreseeable harm and injury to Largan. Samsung, directly  
11 and/or through third parties, manufactures or assembles products that are and have  
12 been offered for sale, sold, purchased, and used within this forum. Samsung,  
13 directly and/or through their distribution networks, regularly place their products  
14 within the stream of commerce with the knowledge, understanding, and desire that  
15 such products will be sold in this forum and throughout the United States.  
16 Samsung, directly or through third parties, also has advertised and marketed such  
17 products in this forum. Thus, Samsung has established minimum contacts within  
18 the forum and purposefully availed itself of the benefits of this forum, and the  
19 exercise of personal jurisdiction over Samsung would not offend traditional notions  
20 of fair play and substantial justice.

21 8. Samsung transacts business in this forum because, among other things,  
22 Samsung manufactures, imports, and distributes products that are offered for sale,  
23 sold, purchased, and used within this forum. Samsung has also committed tortious  
24 acts of patent infringement in this forum and has a regular and established place of  
25 business in this forum. Samsung also is subject to personal jurisdiction in this  
26 forum. Venue therefore is proper in this judicial district pursuant to 28 U.S.C.  
27 §§ 1391(a)-(d) and 1400(b).

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1 **GENERAL ALLEGATIONS**

2 9. Largan is the world's largest designer and manufacturer of imaging  
3 lens products. Largan's imaging lens products can be used in cameras for a wide  
4 range of devices including mobile phones, tablets, notebook computers, web cams,  
5 automobiles, and scanners. As products such as mobile phones have gotten smaller  
6 and users have increasingly relied upon cameras in their mobile phones rather than  
7 stand-alone products, the need for imaging lenses of compact size yet high  
8 performance has become increasingly pressing. Through its innovation and high  
9 quality design of products, Largan has developed a portfolio of patents, including  
10 the patents-in-suit, to address these needs.

11 10. Samsung's mobile phones, such as the Galaxy Note II, include one or  
12 more cameras. Each camera includes an imaging lens. Largan has become aware  
13 that many of Samsung's mobile phones, such as the Galaxy Note II, incorporate the  
14 inventions of one or more of Largan's patents. Largan notified Samsung that it was  
15 infringing Largan's patents-in-suit in at least January, February, August, and  
16 September 2013 through letters, emails, and claim charts sent to Samsung and its  
17 counsel. Despite being aware of Largan's patents and Largan's infringement  
18 allegations, Samsung has continued selling the infringing devices.

19 **THE ASSERTED PATENTS**

20 11. Largan owns by assignment all rights to United States Patent No.  
21 7,262,925 ("the '925 patent"), titled "Image Lens Array," which duly and legally  
22 issued on August 28, 2007. A copy of the '925 patent is attached as Exhibit A.

23 12. Largan owns by assignment all rights to United States Patent No.  
24 7,394,602 ("the '602 patent"), titled "Optical System for Taking Image," which  
25 duly and legally issued on July 1, 2008. A copy of the '602 patent is attached as  
26 Exhibit B.

27 13. Largan owns by assignment all rights to United States Patent No.  
28 7,898,747 ("the '747 patent"), titled "Thin Type Optical Lens System for Taking

1 Image,” which duly and legally issued on March 1, 2011. A copy of the ’747  
2 patent is attached as Exhibit C.

3 14. Largan owns by assignment all rights to United States Patent No.  
4 8,154,807 (“the ’807 patent”), titled “Imaging Lens Assembly,” which duly and  
5 legally issued on April 10, 2012. A copy of the ’807 patent is attached as Exhibit  
6 D.

7 15. Largan owns by assignment all rights to United States Patent No.  
8 8,284,291 (“the ’291 patent”), titled “Photographing Optical Lens Assembly,”  
9 which duly and legally issued on October 9, 2012. A copy of the ’291 patent is  
10 attached as Exhibit E.

11 16. Largan owns by assignment all rights to United States Patent No.  
12 8,508,860 (“the ’860 patent”), titled “Optical Lens System,” which duly and legally  
13 issued on August 13, 2013. A copy of the ’860 patent is attached as Exhibit F.

#### 14 **CLAIMS FOR RELIEF**

##### 15 **CLAIM 1 – INFRINGEMENT OF U.S. PATENT NO. 7,262,925**

16 17. Largan incorporates by reference the allegations in the paragraphs  
17 above.

18 18. On information and belief, Samsung has infringed and continues to  
19 infringe one or more claims of the ’925 patent under 35 U.S.C. § 271.

20 19. Samsung has directly infringed the ’925 patent in the United States and  
21 this District through the making, using, sale, offer for sell, and/or importation of its  
22 products, including without limitation the Samsung Galaxy Note and Galaxy S II.  
23 On information and belief, the front camera in the accused devices has optical  
24 shapes and parameters meeting all of the requirements of one or more claims of the  
25 ’925 patent, whether literally or under the doctrine of equivalents.

26 20. Samsung has induced infringement by inducing others, such as cellular  
27 service providers, distributors, end users, and other Samsung entities, to make, use,  
28 sell, offer for sale, and/or import the accused devices in the United States and this

1 District. Samsung also has provided directions, instruction manuals, guides, and/or  
2 other materials that instruct and encourage the purchaser of an accused device to  
3 use the device in a manner that infringes certain claims of the '925 patent. Largan  
4 placed Samsung on notice of its infringement of the '925 patent on or before  
5 January 31, 2013.

6 21. On information and belief, Samsung's infringement has been, and  
7 continues to be, willful and deliberate, and has caused substantial damage to  
8 Largan. For example, Samsung has continued to sell the accused devices despite its  
9 awareness of the '925 patent and Largan's infringement allegations.

10 22. On information and belief, Samsung's infringement in violation of  
11 federal patent laws will continue to injure Largan unless otherwise enjoined by this  
12 Court.

13 **CLAIM 2 – INFRINGEMENT OF U.S. PATENT NO. 7,394,602**

14 23. Largan incorporates by reference the allegations in the paragraphs  
15 above.

16 24. On information and belief, Samsung has infringed and continues to  
17 infringe one or more claims of the '602 patent under 35 U.S.C. § 271.

18 25. Samsung has directly infringed the '602 patent in the United States and  
19 this District through the making, using, sale, offer for sell, and/or importation of its  
20 products, including without limitation the Samsung Galaxy Note and Galaxy S II.  
21 On information and belief, the front camera in the accused devices has optical  
22 shapes and parameters meeting all of the requirements of one or more claims of the  
23 '602 patent, whether literally or under the doctrine of equivalents.

24 26. Samsung has induced infringement by inducing others, such as cellular  
25 service providers, distributors, end users, and other Samsung entities, to make, use,  
26 sell, offer for sale, and/or import the accused devices in the United States and this  
27 District. Samsung also has provided directions, instruction manuals, guides, and/or  
28 other materials that instruct and encourage the purchaser of an accused device to

1 use the device in a manner that infringes certain claims of the '602 patent. Largan  
2 placed Samsung on notice of its infringement of the '602 patent on or before  
3 January 31, 2013.

4 27. On information and belief, Samsung's infringement has been, and  
5 continues to be, willful and deliberate, and has caused substantial damage to  
6 Largan. For example, Samsung has continued to sell the accused devices despite its  
7 awareness of the '602 patent and Largan's infringement allegations.

8 28. On information and belief, Samsung's infringement in violation of  
9 federal patent laws will continue to injure Largan unless otherwise enjoined by this  
10 Court.

11 **CLAIM 3 – INFRINGEMENT OF U.S. PATENT NO. 7,898,747**

12 29. Largan incorporates by reference the allegations in the paragraphs  
13 above.

14 30. On information and belief, Samsung has infringed and continues to  
15 infringe one or more claims of the '747 patent under 35 U.S.C. § 271.

16 31. Samsung has directly infringed the '747 patent in the United States and  
17 this District through the making, using, sale, offer for sell, and/or importation of its  
18 products, including without limitation the Samsung Galaxy S III and Galaxy Note  
19 II. On information and belief, the front camera in the accused devices has optical  
20 shapes and parameters meeting all of the requirements of one or more claims of the  
21 '747 patent, whether literally or under the doctrine of equivalents.

22 32. Samsung has induced infringement by inducing others, such as cellular  
23 service providers, distributors, end users, and other Samsung entities, to make, use,  
24 sell, offer for sale, and/or import the accused devices in the United States and this  
25 District. Samsung also has provided directions, instruction manuals, guides, and/or  
26 other materials that instruct and encourage the purchaser of an accused device to  
27 use the device in a manner that infringes certain claims of the '747 patent. Largan  
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1 placed Samsung on notice of its infringement of the '747 patent on or before  
2 February 5, 2013.

3 33. On information and belief, Samsung's infringement has been, and  
4 continues to be, willful and deliberate, and has caused substantial damage to  
5 Largan. For example, Samsung has continued to sell the accused devices despite its  
6 awareness of the '747 patent and Largan's infringement allegations.

7 34. On information and belief, Samsung's infringement in violation of  
8 federal patent laws will continue to injure Largan unless otherwise enjoined by this  
9 Court.

10 **CLAIM 4 – INFRINGEMENT OF U.S. PATENT NO. 8,154,807**

11 35. Largan incorporates by reference the allegations in the paragraphs  
12 above.

13 36. On information and belief, Samsung has infringed and continues to  
14 infringe one or more claims of the '807 patent under 35 U.S.C. § 271.

15 37. Samsung has directly infringed the '807 patent in the United States and  
16 this District through the making, using, sale, offer for sell, and/or importation of its  
17 products, including without limitation the Samsung Galaxy S III and Galaxy Note  
18 II. On information and belief, the front camera in the accused devices has optical  
19 shapes and parameters meeting all of the requirements of one or more claims of the  
20 '807 patent, whether literally or under the doctrine of equivalents.

21 38. Samsung has induced infringement by inducing others, such as cellular  
22 service providers, distributors, end users, and other Samsung entities, to make, use,  
23 sell, offer for sale, and/or import the accused devices in the United States and this  
24 District. Samsung also has provided directions, instruction manuals, guides, and/or  
25 other materials that instruct and encourage the purchaser of an accused device to  
26 use the device in a manner that infringes certain claims of the '807 patent. Largan  
27 placed Samsung on notice of its infringement of the '807 patent on or before  
28 February 5, 2013.



1           39. On information and belief, Samsung's infringement has been, and  
2 continues to be, willful and deliberate, and has caused substantial damage to  
3 Largan. For example, Samsung has continued to sell the accused devices despite its  
4 awareness of the '807 patent and Largan's infringement allegations.

5           40. On information and belief, Samsung's infringement in violation of  
6 federal patent laws will continue to injure Largan unless otherwise enjoined by this  
7 Court.

8           **CLAIM 5 – INFRINGEMENT OF U.S. PATENT NO. 8,284,291**

9           41. Largan incorporates by reference the allegations in the paragraphs  
10 above.

11           42. On information and belief, Samsung has infringed and continues to  
12 infringe one or more claims of the '291 patent under 35 U.S.C. § 271.

13           43. Samsung has directly infringed the '291 patent in the United States and  
14 this District through the making, using, sale, offer for sell, and/or importation of its  
15 products, including without limitation the Samsung Galaxy Note II. On  
16 information and belief, the rear camera in the accused devices has optical shapes  
17 and parameters meeting all of the requirements of one or more claims of the '291  
18 patent, whether literally or under the doctrine of equivalents.

19           44. Samsung has induced infringement by inducing others, such as cellular  
20 service providers, distributors, end users, and other Samsung entities, to make, use,  
21 sell, offer for sale, and/or import the accused devices in the United States and this  
22 District. Samsung also has provided directions, instruction manuals, guides, and/or  
23 other materials that instruct and encourage the purchaser of an accused device to  
24 use the device in a manner that infringes certain claims of the '291 patent. Largan  
25 placed Samsung on notice of its infringement of the '291 patent on or before  
26 August 10, 2013.

27           45. On information and belief, Samsung's infringement has been, and  
28 continues to be, willful and deliberate, and has caused substantial damage to

1 Largan. For example, Samsung has continued to sell the accused devices despite its  
2 awareness of the '291 patent and Largan's infringement allegations.

3 46. On information and belief, Samsung's infringement in violation of  
4 federal patent laws will continue to injure Largan unless otherwise enjoined by this  
5 Court.

6 **CLAIM 6 – INFRINGEMENT OF U.S. PATENT NO. 8,508,860**

7 47. Largan incorporates by reference the allegations in the paragraphs  
8 above.

9 48. On information and belief, Samsung has infringed and continues to  
10 infringe one or more claims of the '860 patent under 35 U.S.C. § 271.

11 49. Samsung has directly infringed the '860 patent in the United States and  
12 this District through the making, using, sale, offer for sell, and/or importation of its  
13 products, including without limitation the Samsung Galaxy Note II. On  
14 information and belief, the rear camera in the accused devices has optical shapes  
15 and parameters meeting all of the requirements of one or more claims of the '860  
16 patent, whether literally or under the doctrine of equivalents.

17 50. Samsung has induced infringement by inducing others, such as cellular  
18 service providers, distributors, end users, and other Samsung entities, to make, use,  
19 sell, offer for sale, and/or import the accused devices in the United States and this  
20 District. Samsung also has provided directions, instruction manuals, guides, and/or  
21 other materials that instruct and encourage the purchaser of an accused device to  
22 use the device in a manner that infringes certain claims of the '860 patent. Largan  
23 placed Samsung on notice of its infringement of the '860 patent on or before  
24 August 10, 2013.

25 51. On information and belief, Samsung's infringement has been, and  
26 continues to be, willful and deliberate, and has caused substantial damage to  
27 Largan. For example, Samsung has continued to sell the accused devices despite its  
28 awareness of the '860 patent and Largan's infringement allegations.



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H. That the Court order a full accounting of the damages above, including for past infringement and any continuing or future infringement;

I. Such other and further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Largan hereby demands a trial by jury of all issues so triable.

DATED: November 14, 2013

**PERKINS COIE LLP**

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