

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

MLR, LLC,)	
)	
Plaintiff,)	
)	Civil Action No. 1:13cv1208
v.)	GBL/TCB
)	
SONY ELECTRONICS INC.,)	
)	JURY DEMANDED
Defendant.)	
_____)	

AMENDED COMPLAINT

Plaintiff MLR, LLC complains of Defendant Sony Electronics Inc. as follows:

JURISDICTION AND VENUE

1. Title 28 of the United States Code Section 1338(a) confers subject matter jurisdiction on this Court because Defendant has infringed plaintiff's patents. The Patent Act of 1952, as amended, 35 U.S.C. § 271, *et seq.*, makes patent infringement illegal and actionable through a private cause of action.

2. Defendant has transacted business in this judicial district by making, using, selling, or offering to sell and distributing products that infringe MLR's patents either in this judicial district or in the United States.

3. Venue is proper in the Eastern District of Virginia under the general federal venue statute, 28 U.S.C. § 1391(d), and under the specific venue provision relating to patent-infringement cases, 28 U.S.C. § 1400(b).

PARTIES

4. MLR is a Virginia limited liability company with offices at 6190 Hardy Drive, McLean, Virginia 22101. MLR is the assignee and owns all right, title and interest in and has

standing to sue for infringement of United States Patent Nos. 7,386,322, 7,343,173, 6,961,584, 6,934,558, 6,134,453, and 5,854,985 (“the MLR Patents”).

5. Sony Electronics Inc. (“Sony”) is a California corporation with its principal place of business at 16530 Via Esprillo, San Diego, CA 92127-1708. Sony has previously and is presently making, using, selling, offering for sale, and/or importing into the United States portable wireless products that infringe one or more claims of the MLR Patents. Sony has infringed the MLR Patents either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

BACKGROUND

6. MLR is the owner of patent rights, which cover commercially significant technologies related to the control of multi-mode, multi-frequency, and multi-protocol networks for electronic communications devices. The MLR patents, for example, cover portable wireless devices, such as cellular handsets and portable computers, which can access different cellular or wireless networks to facilitate wireless voice and/or data communications.

7. Defendant designs, manufactures, and sells portable wireless devices, including portable computing devices, which infringe the MLR Patents.

PATENT INFRINGEMENT

8. Defendant has infringed and continues to infringe the MLR Patents both directly and indirectly (through acts of contributory infringement or inducement).

9. Defendant’s infringing products include Wi-Fi enabled, broadband-capable portable computers and laptop computers. Infringing portable computers and laptop computers include without limitation those Sony models listed in Exhibit A to this complaint.

10. Defendant's infringement, contributory infringement and/or inducement to infringe has injured MLR and it, therefore, is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

11. Defendant's infringement, contributory infringement and/or inducement to infringe has been willful because it has known of the MLR Patents and has nonetheless injured and will continue to injure MLR, unless and until this Court enters an injunction, which prohibits further infringement and specifically enjoins further manufacture, use, sale and/or offer for sale of products or services that come within the scope of the MLR Patents.

JURY DEMAND

MLR demands a trial by jury on all issues presented that can properly be tried to a jury.

REQUEST FOR RELIEF

MLR asks this Court to enter judgment against Defendant and against its subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with Defendant, granting the following relief:

- A. An award of damages adequate to compensate MLR for the infringement that has occurred, together with prejudgment interest from the date infringement began;
- B. All other damages permitted by 35 U.S.C. § 284;
- C. A finding that Sony's infringement has been willful;
- D. A finding that this case is exceptional and an award to MLR of its attorneys' fees and costs as provided by 35 U.S.C. § 285;
- E. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the MLR Patents; and
- F. Such other and further relief as this Court or a jury may deem proper and just.

Dated: December 4, 2013

Respectfully submitted,

 /s/ Amy S. Owen
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ATTORNEYS FOR PLAINTIFF, MLR, LLC

Exhibit A

Sony Infringing Portable Computers and Laptops

16GB Xperia Tablet Z	VGN-P588E	VPCS13AGX/B
32GB Xperia Tablet Z	VGN-P588E/Q	VPCS13GX/Z1
PRST2	VGN-P588E/R	VPCS13SGX/Z
PRST2HBC	VGN-P598E/Q	VPCW215AX/L
SVS13A290X	VGN-P610/Q	VPCW221AX/W
VAIO Duo 11 Ultrabook Convertible	VGN-P720K	VPCX111KX
VAIO Duo 13 Red Edition	VGN-P720K/Q	VPCX111KX/B
VAIO Duo 13 Ultrabook Convertible	VGN-P720K/R	VPCX115KX
VAIO Fit 14	VGN-P788K	VPCX115KX/B
VAIO Fit 15	VGN-P788K/G	VPCX115KX/N
VAIO Fit 15 Red Edition	VGN-P788K/N	VPCX115KX/S
VAIO Fit E 14	VGN-P788K/P	VPCX131KX/B
VAIO Fit E 15	VGN-P788K/Q	VPCX135KX/N
VAIO P Series	VGN-P788K/R	VPCX135KX/X
VAIO P SeriesGo	VGN-P788K/W	VPCY21 PCG-51311L
VAIO Pro 11	VGN-P798K	VPCY21 PCG-51411
VAIO Pro 13	VGN-P798K/Q	VPCZ1390X CTO
VAIO Pro 13 Red Edition	VGN-P799L	VPCZ13AHXX/Q
VAIO S Series 13 Premium Laptop	VGN-P799L/Q	VPCZ13BGX/BJ
VAIO S Series 13P Custom Laptop	VGN-SZ640 CTO	VPCZ13BGX/X
VAIO S Series SVS151290X Enhanced	VGN-TZ150N/N	VPCZBAHX/XQ
VAIO S Series SVS151290X Performance	VGNC190P/H	Xperia Tablet Z 4g
VAIO S Series SVS151290X Standard	VGNC320J/W	PlayStation 3 (PS3)
VAIO S Series SVS1512DCXB	VGNTZ240N	PlayStation 4 (PS4)
VAIO TX610P/B Notebook	VPCEA3SFX	PS Vita
VAIO TXN17P/B Notebook	VPCEA3SFX/BQ	
VAIO W Series	VPCEA4AF/P	
VAIO W SeriesGo	VPCEB4AFX/BJ	
VAIO X Series	VPCEC390X	
VAIO X SeriesGo	VPCEC4AFX/BJ	
VAIO Z Series	VPCF13AFX/B	
VAIO Z SeriesGo	VPCF13BFX/B	
VGN-CS320J/W	VPCP113KX/B	
VGN-P530H/G	VPCP118KX/B	
VGN-P588E	VPCP11SKX/P1	