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7 Attorneys for Plaintiff  
SIGNAL IP, INC.

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

11 SIGNAL IP, INC., a California  
12 corporation,

13 Plaintiff,

14 vs.

15 SUZUKI MOTOR OF AMERICA,  
16 INC., a California corporation,

17 Defendant.

Case No. 8:14-cv-00607

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

18 Plaintiff Signal IP, Inc. (“Signal IP” or “Plaintiff”) brings this Complaint  
19 against Defendant Suzuki Motor of America, Inc. (“Suzuki” or “Defendant”),  
20 alleging as follows:

21 **PARTIES**

22 1. Plaintiff Signal IP is a California corporation with its principal place of  
23 business at 11100 Santa Monica Blvd., Suite 380, Los Angeles, CA 90025.

24 2. On information and belief, Suzuki Motor of America, Inc. is a  
25 California corporation with its principal place of business at 3251 East Imperial  
26 Highway, Brea, CA 92821.

27 **JURISDICTION, VENUE AND JOINDER**

28 3. This action arises under the patent laws of the United States, Title 35 of

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1 the United States Code. This Court has subject matter jurisdiction pursuant to 28  
2 U.S.C. §§ 1331 and 1338(a).

3 4. This Court has personal jurisdiction over Defendant. Defendant has  
4 conducted extensive commercial activities and continues to conduct extensive  
5 commercial activities within the State of California. Defendant Suzuki Motor of  
6 America, Inc. is a California corporation with its principal place of business in Brea,  
7 CA, in this judicial district. Defendant is registered to do business in California. On  
8 information and belief, Defendant, directly and/or through intermediaries (including  
9 Defendant’s entities, subsidiaries, distributors, sales agents, partners and others),  
10 distributes, offers for sale, sells, and/or advertises its products (including but not  
11 limited to the products and services that are accused of infringement in this lawsuit)  
12 in the United States, in the State of California, and in this judicial district, under the  
13 “Suzuki” brand name. Defendant has purposefully and voluntarily placed one or  
14 more of its infringing products and services into the stream of commerce with the  
15 expectation that the products and services will be purchased or used by customers in  
16 California and within this judicial district. Accordingly, Defendant has infringed  
17 Signal IP’s patents within the State of California and in this judicial district as  
18 alleged in more detail below.

19 5. Venue is proper in this district under 28 U.S.C. §§ 1391 and 1400(b).

20 **BACKGROUND**

21 6. Signal IP, Inc. is a California corporation with a principal place of  
22 business at 11100 Santa Monica Blvd., Suite 380, Los Angeles, CA 90025. It is the  
23 owner of the entire right, title and interest in and to U.S. Patent Nos. 6,012,007 and  
24 5,463,374 (the “Patents-in-Suit”).

25 7. On information and belief, Defendant is a direct or indirect subsidiary  
26 of global car manufacturer and distributor Suzuki Motor Corporation (“Suzuki  
27 Motor Corp.”), which is headquartered in Japan. Suzuki Motor Corp. manufactures  
28 and distributes vehicles under the “Suzuki” brand name.

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**FIRST CLAIM FOR RELIEF**  
**(Infringement of the ‘007 Patent)**

8. Plaintiff incorporates paragraphs 1 through 7 of this complaint as if set forth in full herein.

9. Signal IP is the owner of the entire right, title, and interest in and to U.S. Patent No. 6,012,007 (the ‘007 Patent), entitled “Occupant Detection Method and Apparatus for Air Bag System.” The ‘007 Patent was duly and legally issued by the U.S. Patent and Trademark Office on January 4, 2000. A true and correct copy of the ‘007 Patent is attached as Exhibit A.

10. Defendant has directly infringed and continues to infringe, literally and/or under the doctrine of equivalents, the ‘007 Patent by making, using, offering for sale, and/or selling in the United States certain methods or systems for vehicles disclosed and claimed in the ‘007 Patent, including but not limited to the Front Passenger Sensing System, used in products including but not limited to the Suzuki Equator, Grand Vitara, Kizashi, SX4, and XL7.

11. Defendant has contributorily infringed and is currently contributorily infringing the ‘007 Patent by making, using, offering for sale, and/or selling in the United States certain methods or systems disclosed and claimed in the ‘007 Patent, including but not limited to the Front Passenger Sensing System, used in products including but not limited to the Suzuki Equator, Grand Vitara, Kizashi, SX4, and XL7.

12. Defendant has actively induced and is actively inducing the infringement of the ‘007 Patent by making, using, offering for sale, and/or selling in the United States certain methods or systems disclosed and claimed in the ‘007 Patent, including but not limited to the Front Passenger Sensing System, used in products including but not limited to the Suzuki Equator, Grand Vitara, Kizashi, SX4, and XL7.

13. Defendant’s infringement of the ‘007 Patent has been and continues to

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1 be willful, rendering this case exceptional within the meaning of 35 U.S.C. § 285.

2 14. Unless enjoined by this Court, Defendant will continue to infringe on  
3 the ‘007 Patent.

4 15. As a direct and proximate result of the Defendant’s conduct, Plaintiff  
5 has suffered, and will continue to suffer, irreparable injury for which it has no  
6 adequate remedy at law. Plaintiff also has been damaged and, until an injunction  
7 issues, will continue to be damaged in an amount yet to be determined.

8 **SECOND CLAIM FOR RELIEF**

9 **(Infringement of the ‘374 Patent)**

10 16. Plaintiff incorporates paragraphs 1 through 15 of this complaint as if set  
11 forth in full herein.

12 17. Signal IP is the owner of the entire right, title, and interest in and to  
13 U.S. Patent No. 5,463,374 (the ‘374 Patent), entitled “Method and Apparatus for  
14 Tire Pressure Monitoring and for Shared Keyless Entry Control.” The ‘374 Patent  
15 was duly and legally issued by the U.S. Patent and Trademark Office on October 31,  
16 1995. A true and correct copy of the ‘374 Patent is attached as Exhibit B.

17 18. Defendant has directly infringed, literally and/or under the doctrine of  
18 equivalents, the ‘374 Patent by making, using, offering for sale, and/or selling in the  
19 United States certain methods or systems for vehicles disclosed and claimed in the  
20 ‘374 Patent, including but not limited to the integrated Remote Keyless Entry (RKE)  
21 and Tire Pressure Monitor Systems (TPMS), used in products including but not  
22 limited to the Suzuki Equator, Grand Vitara, Kizashi, and XS4.

23 19. Defendant has contributorily infringed the ‘374 Patent by making,  
24 using, offering for sale, and/or selling in the United States certain methods or  
25 systems disclosed and claimed in the ‘374 Patent, including but not limited to the  
26 integrated Remote Keyless Entry (RKE) and Tire Pressure Monitor Systems  
27 (TPMS), used in products including but not limited to the Suzuki Equator, Grand  
28 Vitara, Kizashi, and XS4.



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Dated: April 17, 2014

LINER LLP

By:           /s/ Ryan E. Hatch            
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