

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

**VENADIUM LLC,**

**Plaintiff,**

**v.**

**LG ELECTRONICS U.S.A. INC.,**

**Defendant.**

**Civil Action No. 5:15-cv-\_\_\_\_**

**JURY TRIAL DEMANDED**

**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Venadium LLC files its Original Complaint for Patent Infringement based on its knowledge as to itself and based on information and belief as to all other matters as follows:

**THE PARTIES**

1. Venadium LLC is a Texas limited liability company with a principal office at 3000 Custer Road, Suite 270-219, Plano, Texas 75075.
2. Upon information and belief, Defendant LG Electronics U.S.A. Inc. is a Delaware corporation with a principal office at 1000 Sylvan Avenue, Englewood Cliffs, New Jersey 07632. Defendant's registered agent for service of process in Texas is United States Corporation Co., 211 E. 7th Street, Suite 620, Austin, TX 78701.

**JURISDICTION AND VENUE**

3. This action arises under the Patent Act, 35 U.S.C. § 1, *et seq.*
4. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.
5. This Court has personal jurisdiction over Defendant because at least a portion of the infringements alleged herein occurred in this District, and Defendant regularly does or solicits business, engages in other persistent courses of conduct, or derives revenue from goods and services provided to individuals in this District.
6. Venue is proper in this District under §§ 1391(b), (c), and 1400(b).

**THE PATENT-IN-SUIT**

7. On December 11, 2001, the U.S. Patent and Trademark Office duly and lawfully issued U.S. Patent No. 6,330,549 (the “549 patent”), entitled “Protected Shareware.” *See* Exhibit A.

8. Venadium is the owner and assignee of all right, title, and interest in and to the 549 patent.

**COUNT I**

**DIRECT INFRINGEMENT OF U.S. PATENT NO. 6,330,549 UNDER 35 U.S.C. § 271(a)**

9. Venadium incorporates by reference each of its allegations in paragraphs 1 to 8.

10. Without license or authorization, Defendant has directly infringed and continues to directly infringe, literally or under the doctrine of equivalents, one or more claims of the 549 patent under 35 U.S.C. § 271(a) by, among other things, making, using, offering for sale, or selling products that use the Bluetooth 4.0 standard within this District and elsewhere in the United States that perform at least a method for protecting a computer program from unauthorized use independently of any methodology for distributing the computer program to prospective users, the computer program including an embedded protective code, the method comprising the steps of: (a) inhibiting via the embedded protective code at least one functional feature of the computer program from running on a user computer until the user computer receives an authorization message that is digitally signed by an authorized party using a secret signing key, the secret signing key being associated with a public checking key; (b) providing the embedded protective code with access to the public checking key; (c) running an integrity self-check over the computer program to confirm that the computer program is in an anticipated state, the integrity self-check being embedded in the computer program; (d) communicating the authorization message to the user computer; (e) applying the public checking key to the authorization message for authenticating it; and (f) enabling said functional feature to run on the user computer if the authorization message is authenticated and if the integrity self-check result confirms that the computer program is in the anticipated state.

9. The Bluetooth 4.0 standard and the accused method is an integral part of

Defendant's products:

LG Enact  
LG Escape  
LG Escape 2  
LG F60  
LG F70  
LG G Flex  
LG G Flex 2  
LG G Pad 10.1  
LG G Pad 8.0  
LG G Pad 8.3  
LG G Pad X 8.3  
LG G Pro 2  
LG G Stylo  
LG G Vista  
LG G2  
LG G2 mini  
LG G3 Cat. 6  
LG G3 s  
LG G3 Stylus  
LG G4  
LG G4c  
LG Joy  
LG L Bello  
LG L Fino  
LG L20  
LG L30  
LG L35  
LG L40  
LG L50  
LG L60  
LG L65  
LG L70  
LG L80  
LG L90  
LG Lancet  
LG Leon  
LG Logos  
LG Lucid 2  
LG Lucid 3  
LG Mach

LG Motion 4G  
LG Optimus 4X HD  
LG Optimus Blaze  
LG Optimus Exceed 2  
LG Optimus F3  
LG Optimus F3Q  
LG Optimus F5  
LG Optimus F6  
LG Optimus F7  
LG Optimus Fuel  
LG Optimus G  
LG Optimus GJ  
LG Optimus L9 II  
LG Optimus LTE II  
LG Optimus Regard  
LG Optimus Vu II  
LG Optimus Zone 2  
LG REALM  
LG Spectrum 2  
LG Transpyre  
LG TRIBUTE  
LG Ultimate 2

**PRAYER FOR RELIEF**

Venadium seeks the following relief from this Court:

- A. Judgment that Defendant has directly infringed the 549 patent literally or under the doctrine of equivalents;
- B. An accounting of sales of all infringing products through the time of judgment;
- C. An award of damages in the form of at least a reasonable royalty for Defendant's past and future infringement of the 549 patent through the time of judgment, together with pre- and post-judgment interest and costs under 35 U.S.C. § 284;
- D. Judgement that this case is exceptional and an award of Venadium's reasonable attorneys' fees and costs under 35 U.S.C. § 285; and
- E. An award to Venadium of such further relief at law or in equity that this Court deems just and proper.

**JURY TRIAL DEMAND**

Plaintiff Venadium demands a trial by jury on all claims and issues so triable.

Dated: July 16, 2015

Respectfully submitted,



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