



Plaintiff Parthenon Unified Memory Architecture LLC (“PUMA” or “Plaintiff”) hereby submits this Complaint against Defendants LG Moilecomm USA, Inc. (“LG” or “Defendant”) and states as follows:

**THE PARTIES**

1. PUMA is a Texas limited liability company, having a principal place of business at 2400 Dallas Parkway, Suite 200, Plano, Texas 75093.

2. Defendant LG Electronics MobileComm, U.S.A., Inc. is a wholly owned subsidiary of LG Electronics, Inc. and is incorporated under the laws of California, having a principal place of business at 1000 Sylvan Avenue, Englewood Cliffs, New Jersey 07632. LG Electronics MobileComm, U.S.A., Inc. may be served through their registered agent, National Registered Agents, Inc., 818 W. Seventh Street, Suite 930, Los Angeles, CA 90017.

**JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*

4. Venue is proper in this federal district pursuant to 28 U.S.C. §§1391(b)–(c) and 1400(b) in that Defendants have done business in this District, have committed acts of infringement in this District, and continue to commit acts of infringement in this District, entitling PUMA to relief.

**COUNT I: INFRINGEMENT OF U.S. PATENT NO. 5,812,789**

5. On September 22, 1998, the United States Patent and Trademark Office (“USPTO”) duly and legally issued United States Patent No. 06/1 (“the ’789 Patent”), entitled “Video And/Or Audio Decompression And/Or Compression Device That Shares a Memory Interface.” PUMA

holds all rights, title, and interest in and to the '789 Patent. LG is not licensed to the '789 Patent, yet LG knowingly, actively, and lucratively practices the patents.

6. Upon information and belief, LG has infringed directly and continues to infringe directly the '789 Patent. The infringing acts include, but are not limited to, the manufacture, use, sale, importation, and/or offer for sale of products and/or methods encompassed by the claims of the '789 Patent. LG's infringing products include, but are not limited to, at least Optimus Extreme, Optimus Logic, Optimus Dynamic, Optimus Zone, Optimus M+, Optimus Plus, Enlighten, Optimus S, Optimus U, Optimus V, Nexus 4, Optimus G, Optimus G Pro, G Pad 8.3, G Pad 8.3 GPE, G Pad 10.1, G Pad 8.3 LTE, Optimus L70, Joy, Optimus L90, Optimus Exceed 2, Optimus Zone 2, Realm, LG L40, Class, Volt 2, Tribute 2, Band Play, G4C, Escape 2, Lancet, Volt, G Stylo, Magna 4G LTE, Spirit 4G LTE, Joy LTE, G Vista, G3 Vigor, Lucid3, G Pad 10.1, G Pad 7.0 LTE, G Pad 7.0, G Vista, G Pad II 8.0, Leon 4G LTE, Enact, Optimus F3, Optimus F3Q, Optimus F6, G4 Beat, G Pad X 8.3, Escape, F7, Lucid 2, Mach, Motion 4G, Optimus F3, Optimus F5, Optimus F7, Optimus Regard, Spectrum 2, Volt, G Flex, G2, Google Nexus 5, Optimus G, G3, G Pad II 10.1, V10, Nexus 5X, G4, G Flex 2, Connect 4G, Intuition, Optimus Exceed, Spectrum, and Lucid.

7. The acts of infringement by LG have caused damage to PUMA, and PUMA is entitled to recover from LG the damages sustained by PUMA as a result of LG's wrongful acts in an amount subject to proof at trial. The infringement of PUMA's exclusive rights under the '789 Patent by LG has damaged and will continue to damage PUMA, causing irreparable harm, for which there is no adequate remedy at law, unless enjoined by this Court.

8. At least as early as June 12, 2014, LG has had knowledge of the '789 Patent and written notice of the infringement through the service of a complaint of patent infringement on its

affiliates LG Electronics, Inc. and LG Electronics US, Inc. In that lawsuit, LG has produced documents and has presented witnesses, demonstrating that it has actual knowledge of the '789 Patent and PUMA's claim of infringement. Since June 12, 2014, LG's infringement has been willful and PUMA is entitled to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

**COUNT II: INFRINGEMENT OF U.S. PATENT NO. 5,960,464**

9. On September 28, 1999, the USPTO duly and legally issued United States Patent No. 5,960,464 ("the '464 Patent"), entitled "Memory Sharing Architecture For A Decoding In A Computer System." PUMA holds all rights, title, and interest in and to the '464 Patent. LG is not licensed to the '464 Patent, yet LG knowingly, actively, and lucratively practices the patents.

10. Upon information and belief, LG has infringed directly and continues to infringe directly the '464 Patent. The infringing acts include, but are not limited to, the manufacture, use, sale, importation, and/or offer for sale of products and/or methods encompassed by the claims of the '464 Patent. LG's infringing products include, but are not limited to, at least at least Optimus Extreme, Optimus Logic, Optimus Dynamic, Optimus Zone, Optimus M+, Optimus Plus, Enlighten, Optimus S, Optimus U, Optimus V, Nexus 4, Optimus G, Optimus G Pro, G Pad 8.3, G Pad 8.3 GPE, G Pad 10.1, G Pad 8.3 LTE, Optimus L70, Joy, Optimus L90, Optimus Exceed 2, Optimus Zone 2, Realm, LG L40, Class, Volt 2, Tribute 2, Band Play, G4C, Escape 2, Lancet, Volt, G Stylo, Magna 4G LTE, Spirit 4G LTE, Joy LTE, G Vista, G3 Vigor, Lucid3, G Pad 10.1, G Pad 7.0 LTE, G Pad 7.0, G Vista, G Pad II 8.0, Leon 4G LTE, Enact, Optimus F3, Optimus F3Q, Optimus F6, G4 Beat, G Pad X 8.3, Escape, F7, Lucid 2, Mach, Motion 4G, Optimus F3, Optimus F5, Optimus F7, Optimus Regard, Spectrum 2, Volt, G Flex, G2, Google Nexus 5,

Optimus G, G3, G Pad II 10.1, V10, Nexus 5X, G4, G Flex 2, Connect 4G, Intuition, Optimus Exceed, Spectrum, and Lucid..

11. The acts of infringement by LG have caused damage to PUMA, and PUMA is entitled to recover from LG the damages sustained by PUMA as a result of LG's wrongful acts in an amount subject to proof at trial. The infringement of PUMA's exclusive rights under the '464 Patent by LG has damaged and will continue to damage PUMA, causing irreparable harm, for which there is no adequate remedy at law, unless enjoined by this Court.

12. At least as early as June 12, 2014, LG has had knowledge of the '464 Patent and written notice of the infringement through the service of a complaint of patent infringement on its affiliates LG Electronics, Inc. and LG Electronics US, Inc. In that lawsuit, LG has produced documents and has presented witnesses, demonstrating that it has actual knowledge of the '464 Patent and PUMA's claim of infringement. Since June 12, 2014, LG's infringement has been willful and PUMA is entitled to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

**COUNT III: INFRINGEMENT OF U.S. PATENT NO. 7,321,368**

13. On January 22, 2008, the USPTO duly and legally issued United States Patent No. 7,321,368 ("the '368 Patent"), entitled "Electronic System And Method For Display Using A Decoder And Arbiter To Selectively Allow Access To A Shared Memory." PUMA holds all rights, title, and interest in and to the '368 Patent. LG is not licensed to the '368 Patent, yet LG knowingly, actively, and lucratively practices the patents.

14. Upon information and belief, LG has infringed directly and continues to infringe directly the '368 Patent. The infringing acts include, but are not limited to, the manufacture, use, sale, importation, and/or offer for sale of products and/or methods encompassed by the claims of

the '368 Patent. LG's infringing products include, but are not limited to, at least at least Optimus Extreme, Optimus Logic, Optimus Dynamic, Optimus Zone, Optimus M+, Optimus Plus, Enlighten, Optimus S, Optimus U, Optimus V, Nexus 4, Optimus G, Optimus G Pro, G Pad 8.3, G Pad 8.3 GPE, G Pad 10.1, G Pad 8.3 LTE, Optimus L70, Joy, Optimus L90, Optimus Exceed 2, Optimus Zone 2, Realm, LG L40, Class, Volt 2, Tribute 2, Band Play, G4C, Escape 2, Lancet, Volt, G Stylo, Magna 4G LTE, Spirit 4G LTE, Joy LTE, G Vista, G3 Vigor, Lucid3, G Pad 10.1, G Pad 7.0 LTE, G Pad 7.0, G Vista, G Pad II 8.0, Leon 4G LTE, Enact, Optimus F3, Optimus F3Q, Optimus F6, G4 Beat, G Pad X 8.3, Escape, F7, Lucid 2, Mach, Motion 4G, Optimus F3, Optimus F5, Optimus F7, Optimus Regard, Spectrum 2, Volt, G Flex, G2, Google Nexus 5, Optimus G, G3, G Pad II 10.1, V10, Nexus 5X, G4, G Flex 2, Connect 4G, Intuition, Optimus Exceed, Spectrum, and Lucid.

15. The acts of infringement by LG have caused damage to PUMA, and PUMA is entitled to recover from LG the damages sustained by PUMA as a result of LG's wrongful acts in an amount subject to proof at trial. The infringement of PUMA's exclusive rights under the '368 Patent by LG has damaged and will continue to damage PUMA, causing irreparable harm, for which there is no adequate remedy at law, unless enjoined by this Court.

16. At least as early as June 12, 2014, LG has had knowledge of the '368 Patent and written notice of the infringement through the service of a complaint of patent infringement on its affiliates LG Electronics, Inc. and LG Electronics US, Inc. In that lawsuit, LG has produced documents and has presented witnesses, demonstrating that it has actual knowledge of the '368 Patent and PUMA's claim of infringement. Since June 12, 2014, LG's infringement has been willful and PUMA is entitled to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

**COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 7,542,045**

17. On June 2, 2009, the USPTO duly and legally issued United States Patent No. 7,542,045 (“the ’045 Patent”), entitled “Electronic System And Method For Display Using A Decoder And Arbiter To Selectively Allow Access To A Shared Memory.” PUMA holds all rights, title, and interest in and to the ’045 Patent. LG is not licensed to the ’045 Patent, yet LG knowingly, actively, and lucratively practices the patents.

18. Upon information and belief, LG has infringed directly and continues to infringe directly the ’045 Patent. The infringing acts include, but are not limited to, the manufacture, use, sale, importation, and/or offer for sale of products and/or methods encompassed by the claims of the ’045 Patent. LG’s infringing products include, but are not limited to, at least at least Optimus Extreme, Optimus Logic, Optimus Dynamic, Optimus Zone, Optimus M+, Optimus Plus, Enlighten, Optimus S, Optimus U, Optimus V, Nexus 4, Optimus G, Optimus G Pro, G Pad 8.3, G Pad 8.3 GPE, G Pad 10.1, G Pad 8.3 LTE, Optimus L70, Joy, Optimus L90, Optimus Exceed 2, Optimus Zone 2, Realm, LG L40, Class, Volt 2, Tribute 2, Band Play, G4C, Escape 2, Lancet, Volt, G Stylo, Magna 4G LTE, Spirit 4G LTE, Joy LTE, G Vista, G3 Vigor, Lucid3, G Pad 10.1, G Pad 7.0 LTE, G Pad 7.0, G Vista, G Pad II 8.0, Leon 4G LTE, Enact, Optimus F3, Optimus F3Q, Optimus F6, G4 Beat, G Pad X 8.3, Escape, F7, Lucid 2, Mach, Motion 4G, Optimus F3, Optimus F5, Optimus F7, Optimus Regard, Spectrum 2, Volt, G Flex, G2, Google Nexus 5, Optimus G, G3, G Pad II 10.1, V10, Nexus 5X, G4, G Flex 2, Connect 4G, Intuition, Optimus Exceed, Spectrum, and Lucid.

19. The acts of infringement by LG have caused damage to PUMA, and PUMA is entitled to recover from LG the damages sustained by PUMA as a result of LG's wrongful acts in an amount subject to proof at trial. The infringement of PUMA's exclusive rights under the '045 Patent by LG has damaged and will continue to damage PUMA, causing irreparable harm, for which there is no adequate remedy at law, unless enjoined by this Court.

20. At least as early as June 12, 2014, LG has had knowledge of the '045 Patent and written notice of the infringement through the service of a complaint of patent infringement on its affiliates LG Electronics, Inc. and LG Electronics US, Inc. In that lawsuit, LG has produced documents and has presented witnesses, demonstrating that it has actual knowledge of the '045 Patent and PUMA's claim of infringement. Since June 12, 2014, LG's infringement has been willful and PUMA is entitled to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

**COUNT V: INFRINGEMENT OF U.S. PATENT NO. 7,777,753**

21. On August 17, 2010, the USPTO duly and legally issued United States Patent No. 7,777,753 ("the '753 Patent"), entitled "Electronic System And Method For Selectively Allowing Access To A Shared Memory." PUMA holds all rights, title, and interest in and to the '753 Patent. LG is not licensed to the '753 Patent, yet LG knowingly, actively, and lucratively practices the patents.

22. Upon information and belief, LG has infringed directly and continues to infringe directly the '753 Patent. The infringing acts include, but are not limited to, the manufacture, use, sale, importation, and/or offer for sale of products and/or methods encompassed by the claims of the '753 Patent. LG's infringing products include, but are not limited to, at least at least Optimus Extreme, Optimus Logic, Optimus Dynamic, Optimus Zone, Optimus M+, Optimus Plus,



Enlighten, Optimus S, Optimus U, Optimus V, Nexus 4, Optimus G, Optimus G Pro, G Pad 8.3, G Pad 8.3 GPE, G Pad 10.1, G Pad 8.3 LTE, Optimus L70, Joy, Optimus L90, Optimus Exceed 2, Optimus Zone 2, Realm, LG L40, Class, Volt 2, Tribute 2, Band Play, G4C, Escape 2, Lancet, Volt, G Stylo, Magna 4G LTE, Spirit 4G LTE, Joy LTE, G Vista, G3 Vigor, Lucid3, G Pad 10.1, G Pad 7.0 LTE, G Pad 7.0, G Vista, G Pad II 8.0, Leon 4G LTE, Enact, Optimus F3, Optimus F3Q, Optimus F6, G4 Beat, G Pad X 8.3, Escape, F7, Lucid 2, Mach, Motion 4G, Optimus F3, Optimus F5, Optimus F7, Optimus Regard, Spectrum 2, Volt, G Flex, G2, Google Nexus 5, Optimus G, G3, G Pad II 10.1, V10, Nexus 5X, G4, G Flex 2, Connect 4G, Intuition, Optimus Exceed, Spectrum, and Lucid.

23. The acts of infringement by LG have caused damage to PUMA, and PUMA is entitled to recover from LG the damages sustained by PUMA as a result of LG's wrongful acts in an amount subject to proof at trial. The infringement of PUMA's exclusive rights under the '753 Patent by LG has damaged and will continue to damage PUMA, causing irreparable harm, for which there is no adequate remedy at law, unless enjoined by this Court.

24. At least as early as June 12, 2014, LG has had knowledge of the '753 Patent and written notice of the infringement through the service of a complaint of patent infringement on its affiliates LG Electronics, Inc. and LG Electronics US, Inc. In that lawsuit, LG has produced documents and has presented witnesses, demonstrating that it has actual knowledge of the '753 Patent and PUMA's claim of infringement. Since June 12, 2014, LG's infringement has been willful and PUMA is entitled to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

#### **JURY DEMAND**

25. PUMA hereby demands a trial by jury on all issues.

**PRAYER FOR RELIEF**

WHEREFORE, PUMA requests entry of judgment in its favor and against LG as follows:

- a. A declaration that LG has infringed and is infringing the '789, '464, '368, '045, and '753 Patents;
- b. An Order permanently enjoining LG, its officers, agents, employees, and those acting in privity with it, from further direct and/or indirect infringement of the '789, '464, '368, '045, and '753 Patents;
- c. An award of damages to PUMA arising out of LG's infringement of the '789, '464, '368, '045, and '753 Patents, including enhanced damages pursuant to 35 U.S.C. § 284, together with prejudgment and post-judgment interest, in an amount according to proof;
- d. An award of attorneys' fees pursuant to 35 U.S.C. § 285 or as otherwise permitted by law; and,
- e. Granting PUMA its costs and further relief as the Court may deem just and proper.

Dated: November 30, 2015

Respectfully submitted,

*/s/ Amir Alavi*

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