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17 CONTENT AGGREGATION SOLUTIONS LLC  
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2 **IN THE UNITED STATES DISTRICT COURT**  
3 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

4 CONTENT AGGREGATION  
5 SOLUTIONS LLC, a Texas  
6 limited liability company,

7 Plaintiff,

8 v.

9 LG ELECTRONICS, INC. a South  
10 Korea corporation, and LG  
11 ELECTRONICS (USA), INC., a  
12 Delaware corporation,

13 Defendants.

**'16CV0529 AJB BGS**

**PLAINTIFF'S ORIGINAL  
COMPLAINT FOR PATENT  
INFRINGEMENT**

Jury Trial Demanded

13 Plaintiff Content Aggregation Solutions LLC files this complaint against LG  
14 Electronics, Inc. and LG Electronics (USA), Inc., (collectively "Defendants") for  
15 infringement of U.S. Patent No. 8,756,155.

16 **THE PARTIES**

17 1. Content Aggregation Solutions LLC ("CAS" or "Plaintiff") is a Texas  
18 limited liability company with its principal place of business at 8616 Turtle Creek  
19 Blvd., Suite 521, Dallas, Texas 75225. CAS is the owner by assignment of U.S.  
20 Patent No. 8,756,155 ("the '155 patent").

21 2. On information and belief, LG Electronics, Inc. is incorporated under the  
22 laws of South Korea with its principal place of business at LG Twin Tower, 128  
23 Yeoui-Daero, Yeongdeungpo-Gu Seoul, Seoul, 07336, South Korea. This  
24 Defendant may be served at its principal place of business at LG Twin Tower, 128  
25 Yeoui-Daero, Yeongdeungpo-Gu Seoul, Seoul, 07336, South Korea. This  
26 Defendant does business in the State of California and in the Southern District of  
27 California.

28 3. On information and belief, LG Electronics (USA), Inc. (with LG

1 Electronics, Inc., “LG”) is a Delaware corporation with its principal place of  
2 business at 1000 Sylvan Avenue, Englewood Cliffs, New Jersey 07032. This  
3 Defendant may be served with process through its agent at United States  
4 Corporation Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808.  
5 This Defendant does business in the State of California and in the Southern District  
6 of California.

7 **JURISDICTION AND VENUE**

8 4. CAS brings this action for patent infringement under the patent laws of the  
9 United States, namely 35 U.S.C. §§ 271, 281, and 284-285, among others. This  
10 Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.

11 5. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)-(d) and  
12 1400(b). On information and belief, LG Electronics (USA), Inc. transacts business in this  
13 District. LG Electronics, Inc. is an alien that conducts business in this District  
14 through its wholly-owned subsidiary LG Electronics (USA), Inc. On information and  
15 belief, LG has committed acts of infringement in this District.

16 6. Each Defendant is subject to this Court’s specific and general personal  
17 jurisdiction pursuant to due process and/or the California Long Arm Statute, due at  
18 least to its substantial business in this State and judicial district, including: (A) at  
19 least part of its infringing activities alleged herein; and (B) regularly doing or  
20 soliciting business, engaging in other persistent conduct, and/or deriving  
21 substantial revenue from goods sold and services provided to California residents.

22  
23 **COUNT I**

24 **(Patent Infringement - U.S. Patent No. 8,756,155)**

25 7. CAS incorporates paragraphs 1 through 6 herein by reference.

26 8. This cause of action arises under the patent laws of the United States, and in  
27 particular, 35 U.S.C. §§ 271, *et seq.*

28 9. CAS is the owner of the ’155 patent, entitled “Web Based Communication

1 of Information with Reconfigurable Format,” with ownership of all substantial rights  
2 in the ’155 patent, including the right to exclude others and to enforce, sue, and  
3 recover damages for past and future infringement. A true and correct copy of the ’155  
4 patent is attached as Exhibit A.

5 10. The ’155 patent is valid, enforceable and was duly issued in full compliance  
6 with Title 35 of the United States Code.

7 11. The claims of the ’155 patent are directed to solving a variety of technical  
8 problems arising from the significant limitations of the Internet, and in doing so  
9 improve the operation of certain types of devices using the Internet.

10 12. The claims are addressed, among other things, to the technical problem of  
11 how to efficiently and practically assemble a combination of different information  
12 from different sources on the Internet and return that information to a handheld  
13 device, such as a Smartphone, that on its own would have been incapable of  
14 assembling the information in a practical and useful way without modification of the  
15 different sources. The claims additionally reduce technical complexity and improve  
16 efficiency in the handheld device by allowing the aggregation to take place upon the  
17 selection of at least one indicator with a single actuation. The precise way in which  
18 these problems have been solved with the improvements of the ’155 patent claims is  
19 specified in each of the separate claims.

20 13. The Patent Office found that the claimed inventions were different from any  
21 pre-existing technology known to the Patent Office and that a person of ordinary skill  
22 in the technology related to the ’155 patent would not have found it obvious to  
23 combine preexisting technologies to arrive at the solutions set forth in the ’155 patent.

24 14. The integrations in the claims of the ’155 patent provide new results that  
25 allow handheld devices to operate in a superior way that was not available before the  
26 invention of the ’155 claims, providing benefits that did not exist before the ’155  
27 claims.

28 15. None of the claims of the ’155 patent preempts the use of handheld devices,

1 such as Smartphones, on the Internet. Nor do any of the claims preempt commerce on  
2 the Internet, electronic shopping, Internet auctions, web browsing, or any other  
3 fundamental and long prevalent Internet or economic practice.

4 16. There are technical alternatives to the claims of the '155 patent that are  
5 directed to the same problems addressed by the patent claims.

6 17. Each claim of the '155 patent claims an apparatus for a specific computing  
7 device, not a mere general computer or generic handheld device.

8 **DIRECT INFRINGEMENT (35 U.S.C. § 271(a))**

9 18. Defendants have directly infringed, and continue to directly infringe, one or  
10 more claims of the '155 patent in this judicial district and elsewhere in California and  
11 the United States.

12 19. Defendants have infringed at least claims 1, 15 and 16 of the '155 patent, by  
13 using, selling, and/or offering to sell, within the United States, and/or by importing  
14 into the United States, products, including, but not limited to, smartphones and/or  
15 tablets that include Android operating systems with Google Now Cards functionality.

16 20. Defendants are liable for these direct infringements pursuant to 35 U.S.C. §  
17 271.

18 **WHEREFORE**, CAS asks that the Court find in its favor and against  
19 Defendants, and that the Court grant CAS the following relief:

- 20 a. Judgment that one or more claims of the '155 patent has been infringed,  
21 either literally and/or under the doctrine of equivalents, by one or more  
22 Defendants;
- 23 b. Judgment that Defendants account for and pay to CAS all damages and  
24 costs incurred by CAS because of Defendants' infringing activities and  
25 other conduct complained of herein;
- 26 c. Judgment that Defendants account for and pay to CAS a reasonable, on-  
27 going, post judgment royalty because of Defendants' infringing activities  
28 and other conduct complained of herein;

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- d. That CAS be granted pre judgment and post judgment interest on the damages caused by Defendants' infringing activities and other conduct complained of herein; and
- e. That CAS be granted such other and further relief as the Court may deem just and proper under the circumstances

Dated: 03/02/2016

GARTMAN LAW GROUP, P.C.

By: /s/John E. Gartman  
John E. Gartman

*Attorney for Plaintiff Content  
Aggregation Solutions LLC*

**REQUEST FOR TRIAL BY JURY**

Plaintiffs claim trial by jury on all issues so triable.

Dated: 03/02/2016

GARTMAN LAW GROUP, P.C.

By: /s/ John E. Gartman  
John E. Gartman

*Attorney for Plaintiff Content  
Aggregation Solutions LLC*