

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

CORYDORAS TECHNOLOGIES, LLC

*Plaintiff,*

vs.

LG ELECTRONICS INC. and  
LG ELECTRONICS MOBILECOMM  
U.S.A., INC.

*Defendants.*

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Case No. 2:16-cv-687

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Corydoras Technologies, LLC (“Corydoras”) brings this action against defendant LG Electronics Inc. and LG Electronics MobileComm U.S.A., Inc (collectively “LG”) and alleges:

**THE PARTIES**

1. Corydoras is a corporation organized and existing under the laws of Texas. Corydoras owns the entire right, title, and interest in the patents at issue in this case.

2. On information and belief, LG Electronics Inc. is a corporation organized and existing under the laws of South Korea, has an office at LG Twin Towers, 128 Yeouidaero, Yeongdeungpo-gu, Seoul 150-721, South Korea, and is doing business in this judicial district.

3. On information and belief, LG Electronics MobileComm U.S.A., Inc. is a corporation organized and existing under the laws of California, has offices in Englewood Cliffs, New Jersey and San Diego California, and is doing business in this judicial district.

4. LG Electronics MobileComm U.S.A., Inc., based in Englewood Cliffs, New Jersey, is the U.S. sales subsidiary of LG Electronics Inc.

5. LG Electronics MobileComm U.S.A., Inc. is a subsidiary of LG Electronics U.S.A., Inc., based in Englewood Cliffs, New Jersey. LG Electronics U.S.A., Inc. is a subsidiary of LG Electronics Inc.

#### **JURISDICTION AND VENUE**

6. This is an action for patent infringement arising under the provisions of the Patent Laws of the United States of America, Title 35, United States Code.

7. Subject-matter jurisdiction over Corydoras' claims is conferred upon this Court by 28 U.S.C. §§ 1331 and 1338(a).

8. LG has solicited business in the State of Texas, transacted business within the State of Texas and attempted to derive financial benefit from residents of the State of Texas, including benefits directly related to the instant patent infringement cause of action set forth herein.

9. LG has made, used, sold, offered for sale and/or imported mobile phones and/or have placed such phones into the stream of commerce, which phones have been offered for sale, sold, and/or used in the State of Texas.

10. At the time of filing of this Complaint, LG's mobile phones are available for purchase by consumers in Texas, including within this District.

11. On information and belief, LG has made, used, sold, offered for sale and/or imported wireless mobile communication devices that are alleged herein to infringe one or more of the patents set forth herein, and/or have placed such devices into the stream of commerce, which devices have been offered for sale, sold, and/or used in the State of Texas.

12. This Court has personal jurisdiction over LG.

13. LG is subject to personal jurisdiction in Texas and this judicial district, and is doing business in this judicial district.

**14.** Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b), (c), and (d) and 1400(b).

#### **SUMMARY**

**15.** LG manufactures, has sold and/or sells mobile phones that include a Front camera. The Front camera is depicted in LG phone User Guides.

**16.** LG's mobile phones with a Front camera are capable of displaying a mirror image of an object in the view of the Front camera.

**17.** LG makes, uses, sells, offers for sale and/or imports in the United States mobile phones that include a Front camera that display a mirror image of an object in the view of the Front camera and that include a second camera, sound caller ID (such as Ringtone ID), Voice Command for voice dialing a phone number, email, capability to display the phone's location, Call reject, and/or video phone capability. Such mobile phones are accused of infringement in this action (collectively "Accused Phones). LG's Accused Phones, for example, include LG's V10, G5, G4, G3, G2, G Vista 2, Escape 2, Spree, Stylo, K7 and K10, and all reasonably similar products of LG.

**18.** Corydoras will rely on a reasonable opportunity for discovery of information regarding reasonably similar products of LG that LG made, used, sold, offered for sale and/or imported in the U.S. within 6 years preceding the filing of this Complaint.

**19.** LG's Accused Phones are capable of being used for voice communication.

**20.** LG's Accused Phones are capable of being used for audiovisual communication.

**21.** LG's Accused Phones have two cameras.

**22.** LG's Accused Phones have a camera and display on the same side of the phone.

**23.** LG's Accused Phones have a second camera with a lens located on the side of the phone that is opposite of the display.

24. LG refers to the camera located on the same side of the display as the “Front camera”.

25. LG’s Accused Phones that include a “Front camera” are capable of displaying a mirror image of an object in the view of the Front camera.

26. An LG Accused Phone can be used in an audiovisual call. During such a call, the Accused Phone is capable of displaying a mirror image of the user of the Accused Phone and is capable of wirelessly transmitting an image of the user that is not a mirror image of the user.

27. LG’s Accused Phones include a microphone and speaker for use during voice communication.

28. LG’s Accused Phones include capability identified as “Call reject.”

29. LG’s “Call reject” on an Accused Phone prevents an incoming caller that has been blocked from conducting a voice communication with said Accused Phone.

30. LG’s Accused Phone is capable of displaying its location on its display.

31. LG’s Accused Phones include capability for authoring and transmitting email.

32. LG’s Accused Phones include “Voice Command.”

33. Voice Command provides a user of an Accused Phone with voice dialing capability.

34. LG’s Accused Phones include capability to identify an incoming call with a specifically assigned ringtone.

35. LG’s Accused Phones are wireless communication devices.

#### **COUNT I – INFRINGEMENT OF THE ‘664 PATENT**

36. On August 17, 2010, U.S. Patent No. 7,778,664 (“the ‘664 patent”), entitled “Communication Device” was duly and legally issued to the inventor, Iwao Fujisaki. The ‘664 patent has been assigned to Corydoras. Corydoras owns all right, title and interest in the ‘664 patent,

including the right to sue for and recover all past, present and future damages for infringement of the '664 patent.

**37.** The '664 patent is presumed valid.

**38.** LG's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

**39.** LG's Accused Phones include a camera on the same side as the display. LG refers to this camera as the "Front camera." LG's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

**40.** On information and belief, the LG Accused Phones are covered by one or more of the following claims of the '664 patent: 1, 3, 6-10, and/or 15-18.

**41.** On information and belief, LG, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1, 3, 6-10, and/or 15-18 of the '664 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '664 patent.

**42.** On information and belief, consumers purchase and use LG's Accused Phones and are instructed by LG to use such Accused Phones to infringe one or more claims of the '664 patent.

**43.** On information and belief, LG provides instructions, such as user guides, that instruct consumers on how to use the Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '664 patent.

**44.** On information and belief, LG indirectly infringes one or more claims of the '664 patent in violation of 35 U.S.C. 271(b) by inducing consumers of the Accused Phones to directly

infringe one or more claims of the '664 patent through their use of such Accused Phones in accordance with LG's instructions.

**45.** For example, on information and belief, LG induces direct infringement of the '664 patent by providing user guides and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following LG's instructions, the end users of the Accused Phones directly infringe one more claims of the '664 patent. LG engages in such inducement knowingly and, at least from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '664 patent.

**46.** LG is liable for infringement of the '664 patent pursuant to 35 U.S.C. § 271.

**47.** LG's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from LG the damages sustained by Corydoras as a result of LG's wrongful acts in an amount subject to proof at trial.

## **COUNT II – INFRINGEMENT OF THE '236 PATENT**

**48.** On May 17, 2011, U.S. Patent No. 7,945,236 ("the '236 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '236 patent has been assigned to Corydoras. Corydoras owns all right, title and interest in the '236 patent, including the right to sue for and recover all past, present and future damages for infringement of the '236 patent.

**49.** The '236 patent is presumed valid.

**50.** LG's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls

**51.** LG's Accused Phones include a camera on the same side as the display. LG refers to this camera as the "Front camera." LG's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

**52.** Each of LG's Accused Phones is capable of displaying its geographic location on its display. Each of LG's Accused Phones is capable of displaying its geographic location on its display based, at least in part, on GPS data.

**53.** On information and belief, the LG Accused Phones are covered by one or more of the following claims of the '236 patent: 1-3, 5, 8-11, and/or 16-18.

**54.** On information and belief, LG, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-3, 5, 8-11, and/or 16-18 of the '236 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '236 patent.

**55.** On information and belief, consumers purchase and use LG's Accused Phones and are instructed by LG to use such Accused Phones and to perform methods that infringe one or more claims of the '236 patent.

**56.** On information and belief, LG provides instructions, such as user manuals, that instruct consumers on how to use LG's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '236 patent.

**57.** On information and belief, LG indirectly infringes one or more claims of the '236 patent in violation of 35 U.S.C. 271(b) by inducing consumers of LG's Accused Phones to directly

infringe one or more claims of the '236 patent through their use of such Accused Phones in accordance with LG's instructions.

**58.** For example, on information and belief, LG induces direct infringement of the '236 patent by providing user manuals and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following LG's instructions, the end users of the Accused Phones directly infringe one more claims of the '236 patent. LG engages in such inducement knowingly and, at least from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '236 patent.

**59.** LG is liable for infringement of the '236 patent pursuant to 35 U.S.C. § 271.

**60.** LG's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from LG the damages sustained by Corydoras as a result of LG's wrongful acts in an amount subject to proof at trial.

### **COUNT III – INFRINGEMENT OF THE '287 PATENT**

**61.** On May 17, 2011, U.S. Patent No. 7,945,287 ("the '287 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '287 patent has been assigned to Corydoras. Corydoras owns all right, title and interest in the '287 patent, including the right to sue for and recover all past, present and future damages for infringement of the '287 patent.

**62.** The '287 patent is presumed valid.

**63.** LG's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

**64.** LG's Accused Phones include a camera on the same side as the display. LG refers to this camera as the "Front camera." LG's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

**65.** LG's Accused Phones are manufactured and sold with multiple ringtones preloaded on each Accused Phone. Based on user input, each Accused Phone is capable of associating an incoming call with a preloaded ringtone designated by the user input.

**66.** On information and belief, the LG's Accused Phones are covered by one or more of the following claims of the '287 patent: 1-3, 5, 8-11, and/or 16-18.

**67.** On information and belief, LG, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-3, 5, 8-11, and/or 16-18 of the '287 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '287 patent.

**68.** On information and belief, consumers purchase and use LG's Accused Phones and are instructed by LG to use such Accused Phones and to perform methods that infringe one or more claims of the '287 patent.

**69.** On information and belief, LG provides instructions, such as user manuals, that instruct consumers on how to use LG's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '287 patent.

**70.** On information and belief, LG indirectly infringes one or more claims of the '287 patent in violation of 35 U.S.C. 271(b) by inducing consumers of LG's Accused Phones to directly

infringe one or more claims of the '287 patent through their use of such Accused Phones in accordance with LG's instructions.

**71.** For example, on information and belief, LG induces direct infringement of the '287 patent by providing user manuals and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following LG's instructions, the end users of the Accused Phones directly infringe one more claims of the '287 patent. LG engages in such inducement knowingly and, at least from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '287 patent.

**72.** LG is liable for infringement of the '287 patent pursuant to 35 U.S.C. § 271.

**73.** LG's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from LG the damages sustained by Corydoras as a result of LG's wrongful acts in an amount subject to proof at trial.

#### **COUNT IV – INFRINGEMENT OF THE '037 PATENT**

**74.** On August 9, 2011, U.S. Patent No. 7,996,037 ("the '037 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '037 patent has been assigned to Corydoras. Corydoras owns all right, title and interest in the '037 patent, including the right to sue for and recover all past, present and future damages for infringement of the '037 patent.

**75.** The '037 patent is presumed valid.

**76.** LG's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

**77.** LG's Accused Phones include a camera on the same side as the display. LG refers to this camera as the "Front camera." LG's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

**78.** LG's Accused Phones are capable of initiating a phone call using voice commands. By way of example, LG's "Voice Command" provides the capability to initiate a phone call in response to a voice command.

**79.** On information and belief, the Accused Phones are covered by one or more of the following claims of the '037 patent: 1-3, 5, 8-11, and/or 16-18.

**80.** On information and belief, LG, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-3, 5, 8-11, and/or 16-18 of the '037 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '037 patent.

**81.** On information and belief, consumers purchase and use LG's Accused Phones and are instructed by LG to use such Accused Phones and to perform methods that infringe one or more claims of the '037 patent.

**82.** On information and belief, LG provides instructions, such as user manuals, that instruct consumers on how to use LG's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones devices in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '037 patent.

**83.** On information and belief, LG indirectly infringes one or more claims of the '037 patent in violation of 35 U.S.C. 271(b) by inducing consumers of LG's Accused Phones to directly

infringe one or more claims of the '037 patent through their use of such Accused Phones in accordance with LG's instructions.

**84.** For example, on information and belief, LG induces direct infringement of the '037 patent by providing user manuals and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following LG's instructions, the end users of the Accused Phones directly infringe one more claims of the '037 patent. LG engages in such inducement knowingly and, at least from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '037 patent.

**85.** LG is liable for infringement of the '037 patent pursuant to 35 U.S.C. § 271.

**86.** LG's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from LG the damages sustained by Corydoras as a result of LG's wrongful acts in an amount subject to proof at trial.

#### **COUNT V – INFRINGEMENT OF THE '009 PATENT**

**87.** On September 20, 2011, U.S. Patent No. 8,024,009 (“the '009 patent”), entitled “Communication Device” was duly and legally issued to the inventor, Iwao Fujisaki. The '009 patent has been assigned to Corydoras. Corydoras owns all right, title and interest in the '009 patent, including the right to sue for and recover all past, present and future damages for infringement of the '009 patent.

**88.** The '009 patent is presumed valid.

**89.** LG's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

**90.** LG's Accused Phones include a camera on the same side as the display. LG refers to this camera as the "Front camera." LG's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

**91.** LG's Accused Phones include capability to reject unwanted callers. Such capability provided by LG is identified as "Call reject." If "Call reject" is enabled on an Accused Phone, an incoming call from a caller that has been blocked will be rejected.

**92.** On information and belief, the Accused Phones are covered by one or more of the following claims of the '009 patent: 1-3, 5, 8-11, and/or 16-18.

**93.** On information and belief, LG, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-3, 5, 8-11, and/or 16-18 of the '009 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '009 patent.

**94.** On information and belief, consumers purchase and use LG's Accused Phones and are instructed by LG to use such Accused Phones and to perform methods that infringe one or more claims of the '009 patent.

**95.** On information and belief, LG provides instructions, such as user manuals, that instruct consumers on how to use LG's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '009 patent.

**96.** On information and belief, LG indirectly infringes one or more claims of the '009 patent in violation of 35 U.S.C. 271(b) by inducing consumers of LG's Accused Phones to directly

infringe one or more claims of the '009 patent through their use of such Accused Phones in accordance with LG's instructions.

**97.** For example, on information and belief, LG induces direct infringement of the '009 patent by providing user manuals and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following LG's instructions, the end users of the Accused Phones directly infringe one more claims of the '009 patent. LG engages in such inducement knowingly and, at least from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '009 patent.

**98.** LG is liable for infringement of the '009 patent pursuant to 35 U.S.C. § 271.

**99.** LG's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from LG the damages sustained by Corydoras as a result of LG's wrongful acts in an amount subject to proof at trial.

#### **COUNT VI – INFRINGEMENT OF THE '540 PATENT**

**100.** On May 20, 2014, U.S. Patent No. 8,731,540 ("the '540 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '540 patent has been assigned to Corydoras. Corydoras owns all right, title and interest in the '540 patent, including the right to sue for and recover all past, present and future damages for infringement of the '540 patent.

**101.** The '540 patent is presumed valid.

**102.** LG's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

**103.** LG's Accused Phones include a camera on the same side as the display. LG refers to this camera as the "Front camera." LG's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

**104.** LG's Accused Phones are capable of sending and receiving email. LG's Accused Phones are capable of authoring an email based on input from a user and wirelessly transmitting such email to a recipient.

**105.** On information and belief, the Accused Phones are covered by one or more of the following claims of the '540 patent: 1-6, 8-11, 13-16 and/or 18.

**106.** On information and belief, LG, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-6, 8-11, 13-16 and/or 18 of the '540 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '540 patent.

**107.** On information and belief, consumers purchase and use LG's Accused Phones and are instructed by LG to use such Accused Phones and to perform methods that infringe one or more claims of the '540 patent.

**108.** On information and belief, LG provides instructions, such as user manuals, that instruct consumers on how to use LG's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '540 patent.

**109.** On information and belief, LG indirectly infringes one or more claims of the '540 patent in violation of 35 U.S.C. 271(b) by inducing consumers of LG's Accused Phones to directly

infringe one or more claims of the '540 patent through their use of such Accused Phones in accordance with LG's instructions.

**110.** For example, on information and belief, LG induces direct infringement of the '540 patent by providing user manuals and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following LG's instructions, the end users of the Accused Phones directly infringe one more claims of the '540 patent. LG engages in such inducement knowingly and, at least from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '540 patent.

**111.** LG is liable for infringement of the '540 patent pursuant to 35 U.S.C. § 271.

**112.** LG's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from LG the damages sustained by Corydoras as a result of LG's wrongful acts in an amount subject to proof at trial.

#### **COUNT VII – INFRINGEMENT OF THE '741 PATENT**

**113.** On November 24, 2015, U.S. Patent No. 9,197,741 ("the '741 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '741 patent has been assigned to Corydoras. Corydoras owns all right, title and interest in the '741 patent, including the right to sue for and recover all past, present and future damages for infringement of the '741 patent.

**114.** The '741 patent is presumed valid.

**115.** LG's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

**116.** LG's Accused Phones include a camera on the same side as the display. LG refers to this camera as the "Front camera." LG's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

**117.** LG's Accused Phones display a mirror image of an object in the view of the Front camera. LG's Accused Phones are capable of wirelessly transmitting video of that object during an audiovisual call.

**118.** LG's Accused Phones include a second camera that faces opposite the direction of the Front camera.

**119.** Each of LG's Accused Phones are capable of associating a specific ringtone with a specific incoming phone number.

**120.** On information and belief, the Accused Phones are covered by one or more of the following claims of the '037 patent: 1, 2, 4, and/or 9.

**121.** On information and belief, LG, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1, 2, 4, and/or 9 of the '741 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '741 patent.

**122.** On information and belief, consumers purchase and use LG's Accused Phones and are instructed by LG to use such Accused Phones and to perform methods that infringe one or more claims of the '741 patent.

**123.** On information and belief, LG provides instructions, such as user manuals, that instruct consumers on how to use LG's Accused Phones in such infringing manner, specifically

intending such consumers will operate these Accused Phones devices in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '741 patent.

**124.** On information and belief, LG indirectly infringes one or more claims of the '741 patent in violation of 35 U.S.C. 271(b) by inducing consumers of LG's Accused Phones to directly infringe one or more claims of the '741 patent through their use of such Accused Phones in accordance with LG's instructions.

**125.** For example, on information and belief, LG induces direct infringement of the '741 patent by providing user manuals and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following LG's instructions, the end users of the Accused Phones directly infringe one more claims of the '741 patent. LG engages in such inducement knowingly and, at least from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '741 patent.

**126.** LG is liable for infringement of the '741 patent pursuant to 35 U.S.C. § 271.

**127.** LG's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from LG the damages sustained by Corydoras as a result of LG's wrongful acts in an amount subject to proof at trial.

#### **PRAYER FOR RELIEF**

**WHEREFORE,** Corydoras prays for entry of judgment that:

**A.** LG has directly infringed and/or induced infringement of the '664, '236, '287, '037, '009, '540 and '741 patents;

**B.** LG accounts for and pays to Corydoras all damages caused by LG's infringement of the '664, '236, '287, '037, '009, '540 and '741 patents;

- C. Corydoras be granted pre-judgment and post-judgment interest on the damages caused to it by reason of LG's patent infringement;
- D. Corydoras be granted its reasonable attorneys' fees;
- E. Costs be awarded to Corydoras; and,
- G. Corydoras be granted such other and further relief as the Court may deem just and proper under the circumstances.

**DEMAND FOR JURY TRIAL**

Corydoras demands trial by jury on all claims and issues so triable.

Respectfully submitted,

Dated: June 28, 2016

By: /s/ John T. Polasek (by Deborah Race)

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