

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

VISTA PEAK VENTURES, LLC,

Plaintiff,

v.

GIANTPLUS TECHNOLOGY CO., LTD.,

Defendant.

§
§
§
§
§
§
§
§
§
§
§
§
§
§

JURY TRIAL DEMANDED

CIVIL ACTION NO. 2:19-cv-00184

PLAINTIFF’S COMPLAINT FOR PATENT INFRINGEMENT:

Plaintiff Vista Peak Ventures, LLC (“VPV”) files this Complaint against Defendant Giantplus Technology Co., Ltd. (“Giantplus”) for infringement of U.S. Patent No. 6,404,474 (“the ‘474 patent”) and U.S. Patent No. 6,657,699 (“the ‘699 patent”), collectively, the “Asserted Patents.”

THE PARTIES

1. Vista Peak Ventures, LLC is a Texas limited liability company, located at 1400 Preston Rd, Suite 472, Plano, TX 75093.

2. Upon information and belief, Giantplus is a multinational corporation organized under the laws of the Republic of China, with its principal place of business located at 15 Industrial Rd. Toufen, Miao-Li (also “Miauli”), Taiwan.

3. Upon information and belief, Giantplus was founded in April 1997 and provides “high value-added [thin-film transistor – liquid crystal] displays such as Point of Sale (POS), Printers, Wearable, Handy Terminal, Electronic Shelf Label (ESL), Home Appliance, Medical

Devices, and GPSMap.” See Giantplus Product Info webpage, (*available at* http://www.giantplus.com.tw/en/prod_infos). Giantplus was first listed on the Taiwan Stock Exchange (TWSE) in 2006. See About Giantplus webpage (*available at* <http://www.giantplus.com.tw/en/about-us/about-giantplus>). Giantplus provides displays for diverse applications including “Point of Sale (POS), Printers, Wearable, Handy Terminal, Electronic Shelf Label (ESL), Home Appliance, Medical Devices, and GPSMap,” and provides custom-designed displays for automotive before-market applications, including “Instrument Clusters, Client Control, Head-up Display (HUD), e-Mirror, and Central Infotainment Display (CID).” See Giantplus Product Info webpage.

4. Upon information and belief, Giantplus’ thin-film transistor – liquid crystal display (“TFT-LCD”) panels are incorporated into consumer electronic devices, including digital camera devices manufactured by Fujifilm. Fujifilm maintains a corporate presence in the United States that “play[s] a major role in FUJIFILM’s global manufacturing system.” See Fujifilm’s Product Lineup webpage (*available at* https://www.fujifilmusa.com/about/corporate_profile/fujifilm_companies/manufacturing/products_services/index.html). Fujifilm ships product to “30 Fujifilm locations in the United States, as well as other ‘direct to US customer’ shipments.” See Fujifilm’s Product Lineup webpage (*available at* https://www.fujifilmusa.com/about/corporate_profile/fujifilm_companies/manufacturing/products_services/page_01.html). Fujifilm also “imports products from other worldwide Fujifilm locations for distribution into the US market place” and “provides storage for some of the raw materials required for manufacturing Fujifilm products” in the U.S. *Id.* Giantplus also maintains a corporate presence in the U.S. via its wholly-owned, U.S.-based subsidiary Giantplus Holding

LLC. Through offers to sell, sales and agreements to transfer ownership of its TFT-LCD panels with either Fujifilm and/or its U.S. subsidiary, Giantplus does business in the U.S., the State of Texas and in the Eastern District of Texas.

JURISDICTION AND VENUE

5. This action arises under the patent laws of the United States, namely 35 U.S.C. §§ 271, 281, and 284-285, among others.

6. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391 because, among other things, Giantplus is not a resident in the United States, and thus may be sued in any judicial district, including this one, pursuant to 28 U.S.C. § 1391(c)(3). *See also In re HTC Corporation*, 889 F.3d 1349, 1357 (Fed. Cir. 2018) (“The Court’s recent decision in *TC Heartland* does not alter” the alien-venue rule.).

8. Upon information and belief, Giantplus is subject to this Court’s specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to its substantial business in this State and judicial district, including: (A) at least part of its infringing activities alleged herein; and (B) regularly doing or soliciting business, engaging in other persistent conduct, and/or deriving substantial revenue from goods sold and services provided to Texas residents vicariously through and/or in concert with its subsidiaries, intermediaries, and/or agents.

9. This Court has personal jurisdiction over Giantplus, directly or through intermediaries including its wholly-owned, U.S.-based subsidiary Giantplus Holding LLC, which is incorporated in the state of Delaware with its principal place of business located at 3500 South

Dupont Highway, Dover, DE 19901. Through direction and control of this subsidiary, Giantplus has committed acts of direct and/or indirect patent infringement within Texas, and elsewhere within the United States, giving rise to this action and/or has established minimum contacts with Texas such that personal jurisdiction over Giantplus would not offend traditional notions of fair play and substantial justice. For example, Giantplus states that it “mainly focus[es] on Europe, North American, Japan, and Taiwan markets” *See* Giantplus Product Info. Giantplus’ TFT-LCDs are used in Fujifilm digital camera products which are imported, offered for sale and sold, including model nos. GPM1410A0 0418 and LM1452B02-1B used in FinePix XP80 and Fujifilm Instax SQ10, respectively. These products are or have been widely sold in retail stores, both brick and mortar and online, within this judicial district and in Texas. *See Litecubes, LLC v. Northern Light Products, Inc.*, 523 F.3d 1353, 1369-70 (Fed. Cir. 2008) (“[T]he sale [for purposes of § 271] occurred at the location of the buyer.”); *see also Semcon IP Inc. v. Kyocera Corporation*, No. 2:18-cv-00197-JRG, 2019 WL 1979930, at *3 (E.D. Tex. May 3, 2019) (denying accused infringer’s motion to dismiss because plaintiff sufficiently plead that purchases of infringing products outside of the United States for importation into and sales to end users in the U.S. may constitute an offer to sell under § 271(a)).

10. Upon information and belief, Giantplus has placed and continues to place infringing TFT-LCD panels into the stream of commerce via an established distribution channel, including pursuant to agreements with U.S.-based customers, such as Fujifilm and/or its wholly-owned, U.S.-based subsidiary, for the sale of infringing products, with the knowledge and/or intent that those products were imported, sold and continue to be sold in the United States and Texas, including in this judicial district. In 2018, Giantplus reported NT9,887,852,000 (approx. 320 million U.S. dollars) in global sales. *See* Giantplus Tech Corp. Announced Fiscal Year 2018

Financial Results (*available at <http://www.giantplus.com.tw/en/announcements/2018-Financial-Results>*).

11. Giantplus controls its wholly-owned, U.S.-based subsidiary Giantplus Holding LLC. Upon information and belief, Giantplus Holding LLC markets Giantplus products and provides customer service and support for Giantplus in the United States, including in Texas and this judicial district. This subsidiary gives Giantplus substantially the business advantages that it would have enjoyed if it conducted its business through its own offices or paid agents in the state.

12. On information and belief, Giantplus has significant ties to, and presence in, the State of Texas and the Eastern District of Texas, making venue in this judicial district both proper and convenient for this action.

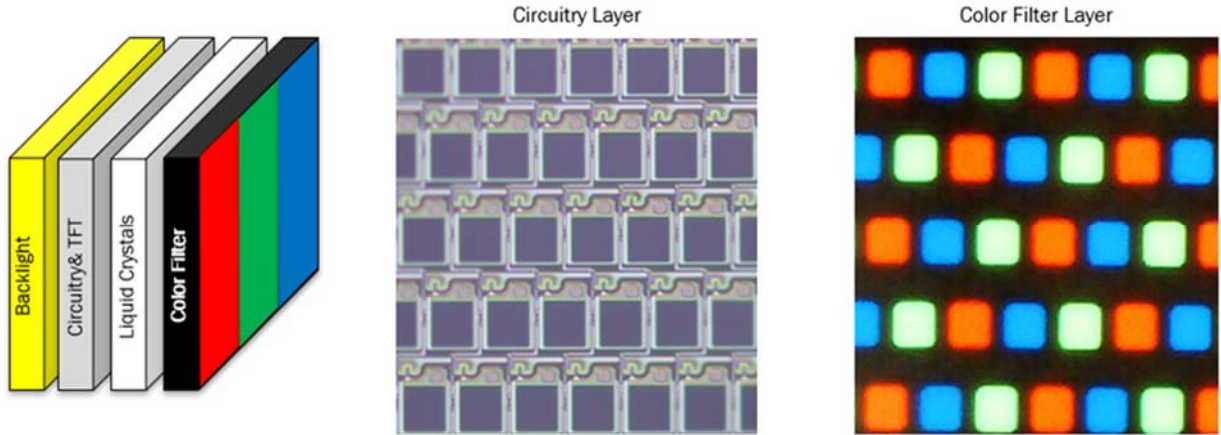
THE ASSERTED PATENTS AND TECHNOLOGY

13. Upon information and belief, a significant portion of operating revenue of Giantplus is derived from the manufacture and sale of TFT-LCD flat panel displays, and Giantplus' main commodities include small-to-medium-sized TFT-LCD related products. *See About Giantplus* (*available at <http://www.giantplus.com.tw/en/about-us/about-giantplus>*). Giantplus asserts that it “has successfully shifted from focusing on niche market to providing valued-added product mix, and further cultivating high-profile markets.” Furthermore, “Giantplus Technology is recognized as a strategic partner in both industrial and automotive markets.” *Id.*

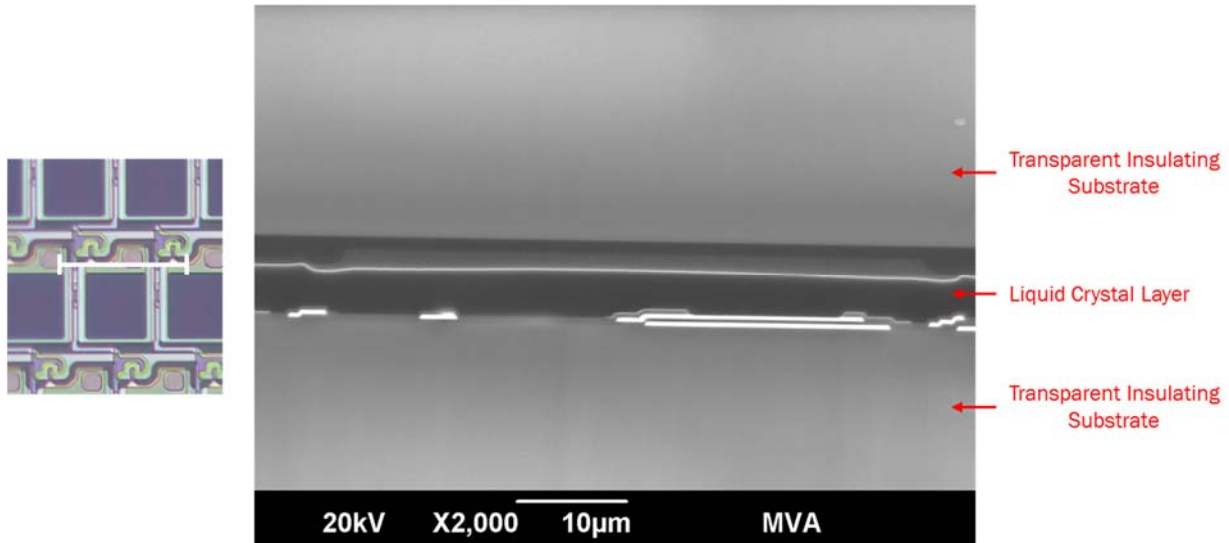
14. The Asserted Patents cover Giantplus' TFT-LCDs, their components, and processes related to the same. An example Giantplus TFT-LCD is the Giantplus LCD Panel, model no. GPM1410A0 0418, which is used in at least Fujifilm's digital camera model FinePix XP80. Another example of a Giantplus TFT-LCD is model no. LM1452B02-1B, which is used in end-user products such as Fujifilm Instax SQ10. The FinePix XP80 and its monitor panel with its labeling listing the Giantplus LCD panel are shown below:



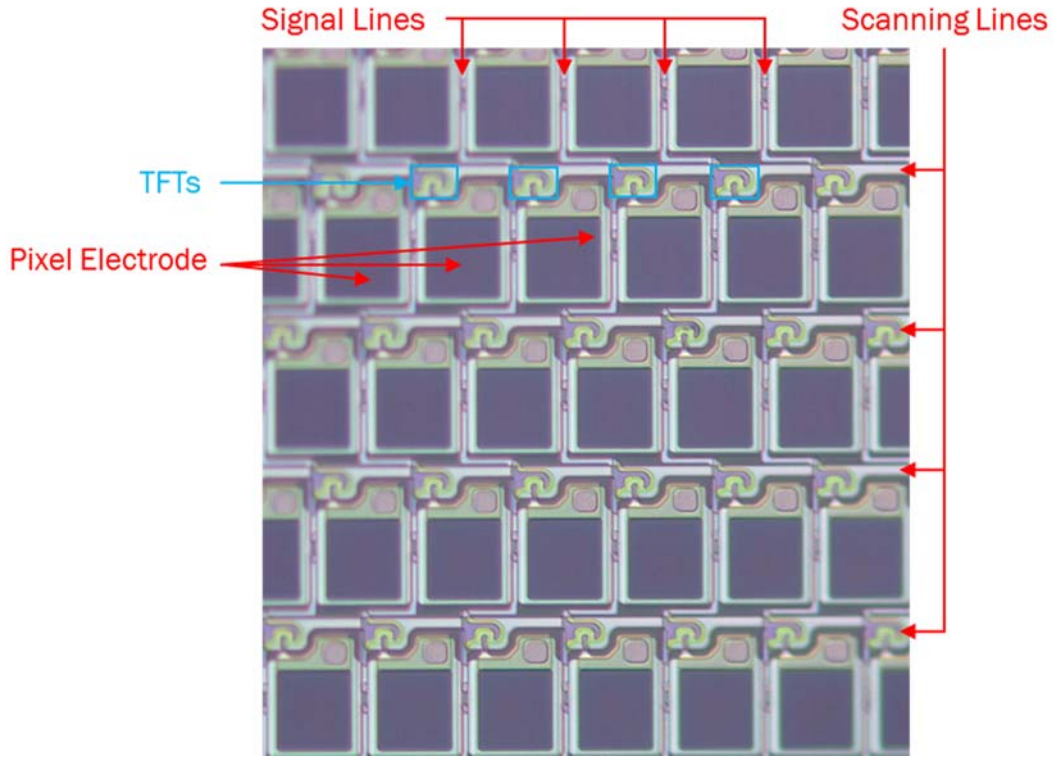
15. Typically, a TFT-LCD has the following structure shown below, comprising of a backlight, a TFT/circuitry layer, a liquid crystal layer, and a color filter:



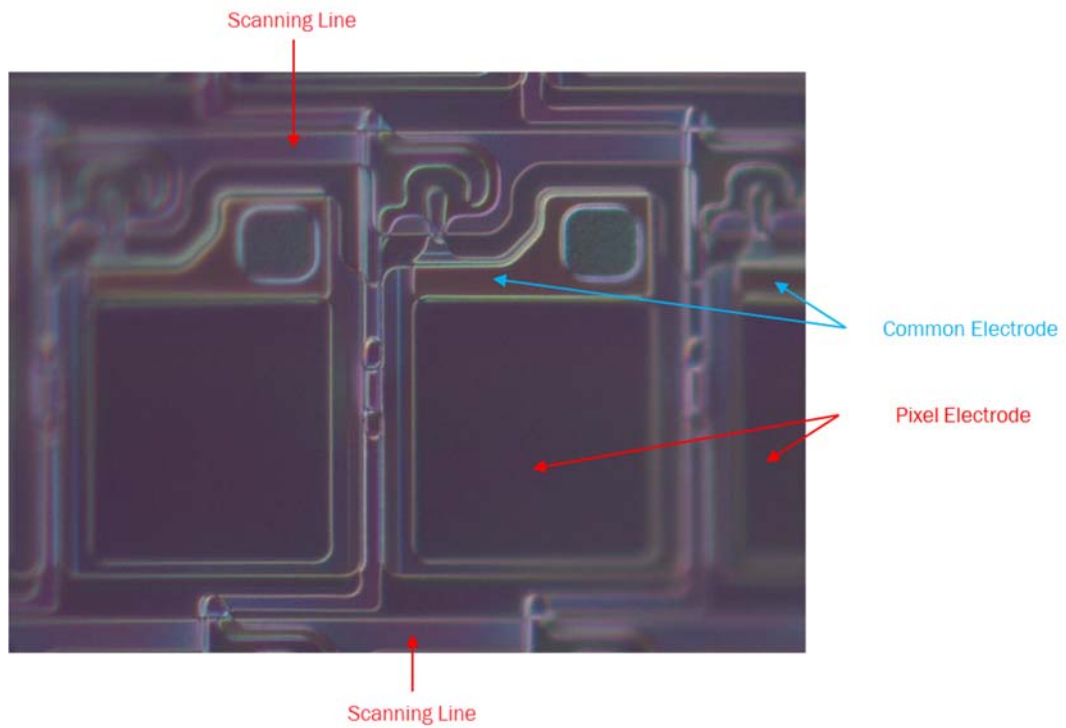
16. The Giantplus LCD panel is an active matrix type liquid crystal display device with two opposing insulating substrates and liquid crystal in-between.



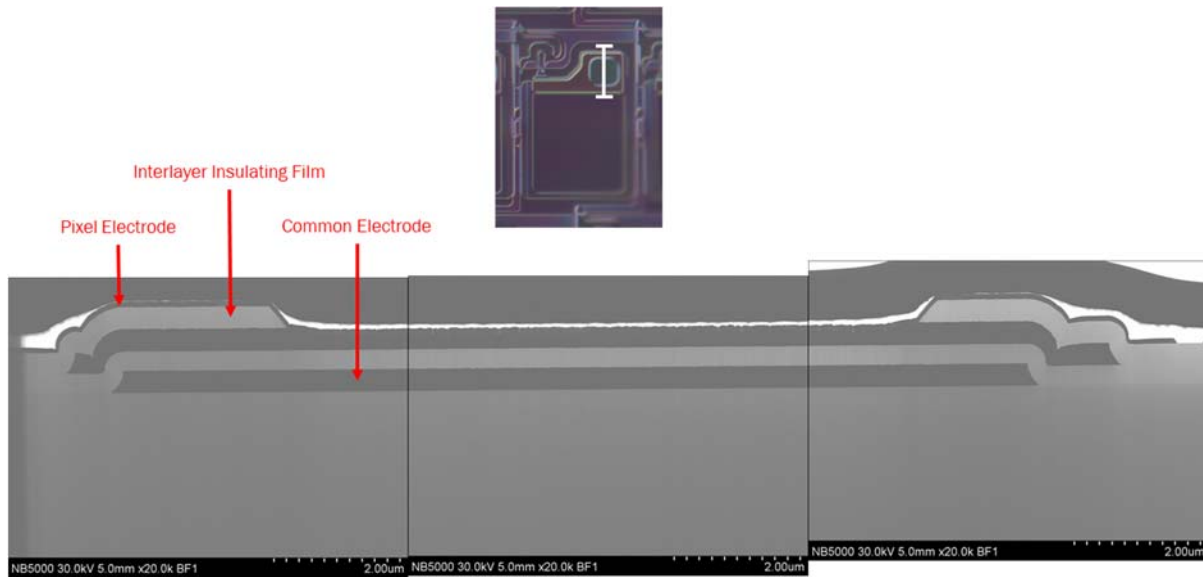
17. As shown above, the TFT-LCD panel contains a TFT array substrate and many TFTs. A teardown image below from the Giantplus TFT-LCD, model no. GPM1410A0 0418 shows a sampling of TFTs and their accompanying circuitry lines (i.e. signal and scanning lines), with larger rectangular areas associated with the pixels.



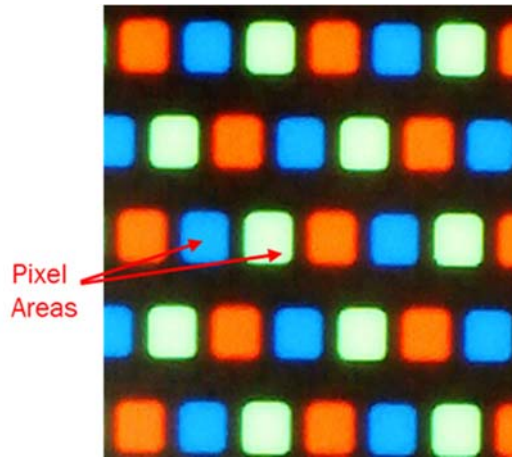
18. The LCD has pixel electrodes that are each opposite to a common electrode.



19. The microscopic cross-sectional view of an LCD in model no. GPM1410A0 0418 shows a pixel electrode opposite a common layer and interposed by an interlayer insulating film.

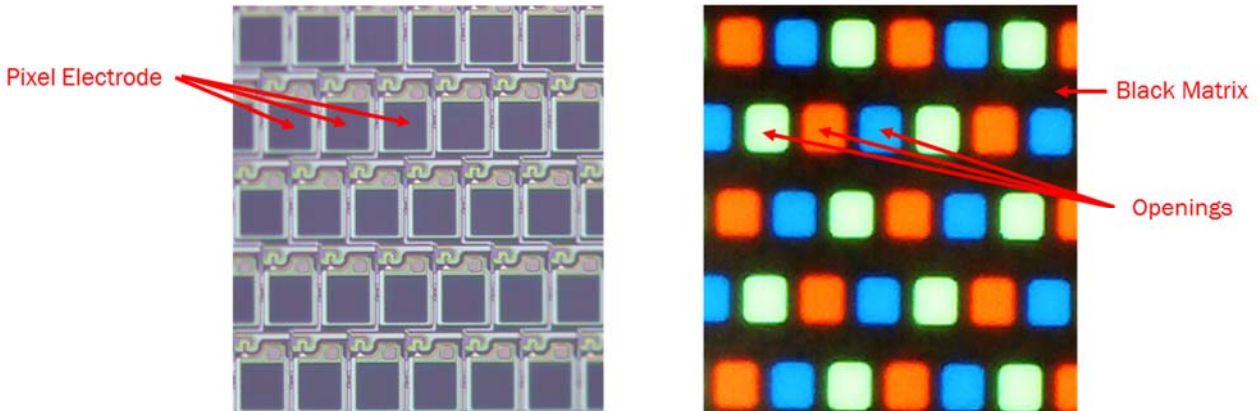


20. A TFT acts as a switch that operates its respective individual pixels using the circuitry lines. In that way, the pixels can be turned on and off to create an image on an LCD by allowing or preventing light to pass through. The individual pixels are more apparent when a color filter layer overlays the circuits as shown in the image below for the model no. GPM1410A0 0418.

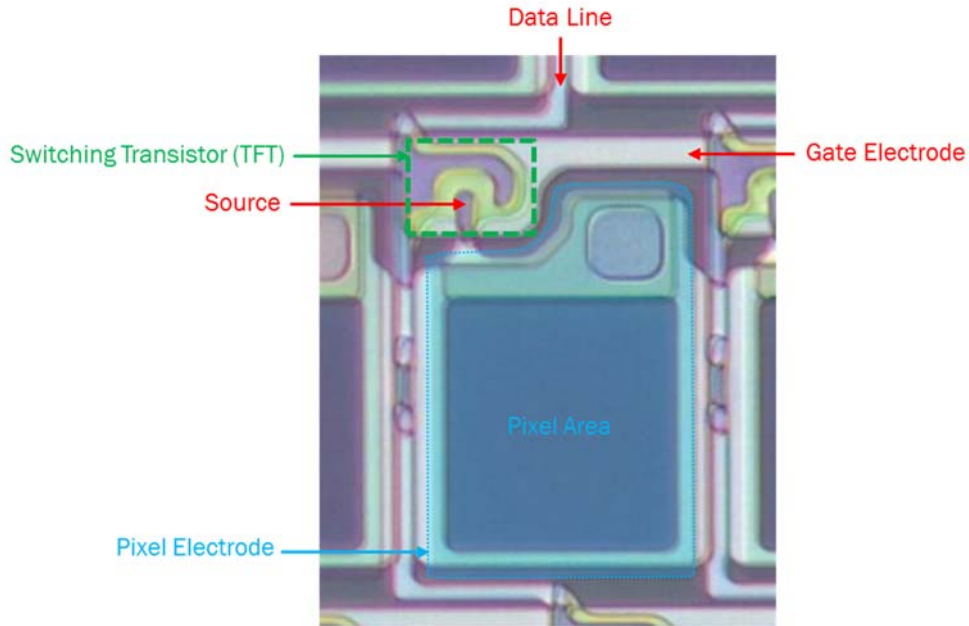


Color Filter Layer Overlays Circuits

21. The LCD has a black matrix with openings in areas opposite to the pixel electrodes.



22. The Asserted Patents also cover Giantplus' processes for making TFT LCDs. The microscopic cross-sectional view of a TFT in model no. GPM1410A0 0418 shows a TFT made using Giantplus' processes and identifies the components of that TFT in relation to other LCD components.



23. For in-plane switching devices, the output of the Giantplus TFTs creates electric fields that orient the liquid crystals to determine whether light passes through the pixels. When an electric field is created, the liquid crystal molecules orient themselves parallel to the electric field and rotate on the same plane, so that light can pass through a polarizer and create an image on the display.

COUNT I

(INFRINGEMENT OF U.S. PATENT NO. 6,404,474)

24. Plaintiff incorporates paragraphs 1 through 23 herein by reference.

25. VPV is the assignee of the '474 patent, entitled "Horizontal electric field LCD with increased capacitance between pixel and common electrodes," with ownership of all substantial rights in the '474 patent, including the right to exclude others and to enforce, sue, and recover damages for past and future infringements.

26. The '474 patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code. The '474 patent issued from U.S. Patent Application No. 09/357,060.

27. Giantplus has and continues to directly and/or indirectly infringe (by inducing infringement) one or more claims of the '474 patent in this judicial district and elsewhere in Texas and the United States.

28. Upon information and belief, Giantplus engages in the research, development, design, manufacture, and sales of TFT-LCD panels. *See* Giantplus' "R & D" page (*available at* <http://www.giantplus.com.tw/en/about-us/about-giantplus/r-d>) (describing that Giantplus "has an experienced and up-to-date engineering team who has consistently dedicated to innovative technologies and product developments").

29. Giantplus directly infringes the '474 patent via 35 U.S.C. § 271(a) by making, having made, offering for sale, selling, and/or importing those TFT-LCD panels, their components, and/or products containing same that incorporate the fundamental technologies covered by the '474 patent, or by having its controlled subsidiaries, intermediaries, and/or agents do the same. Furthermore, upon information and belief, Giantplus sells and makes TFT-LCD panels outside of the United States, intending and/or knowing that those panels are destined for the United States and/or designing those products for sale in the United States, thereby directly infringing the '474 patent.

30. For example, Giantplus infringes claim 1 of the '474 patent via its LCD panel model nos. GPM1410A0 0418 and LM1452B02-1B. Those products include an "active matrix type liquid crystal display device comprising" each of the limitations of claim 1. The technology discussion above and the example accused TFT-LCD panel model nos. GPM1410A0 0418 and LM1452B02-

1B) provide context for Plaintiff's allegations that each of those limitations are met. For example, model nos. GPM1410A0 0418 and LM1452B02-1B include two opposing transparent insulating substrates and liquid crystal interposed therebetween, wherein said liquid crystal is controlled by generating an electric field substantially parallel to the liquid crystal layer with a voltage applied between pixel electrodes and common electrodes both disposed on the first of said substrates, said display device further comprising: on said first substrate: a plurality of scanning lines and a plurality of signal lines orthogonal to one another; a thin film transistor provided near each intersection of a scanning line and a signal line; common electrodes extending substantially parallel to said scanning lines and having a plurality of comb-tooth projections extending toward said scanning lines; pixel electrodes formed substantially parallel to the comb-tooth projections in gaps between the adjacent comb-tooth projections of said common electrodes when said substrate is viewed from the normal direction, at least a portion of each pixel electrode being opposite to a common electrode interposed by an interlayer insulating film; an interlayer insulating film disposed between said common electrodes and said pixel electrodes; and a first alignment film formed above said pixel electrodes interposed by a protective insulating film; on said second substrate: a black matrix provided with openings in areas opposite to each of said pixel electrodes; and a second alignment film; and said active matrix type liquid crystal display device further comprising: accumulated capacitance increasing means for obtaining an accumulated capacitance between said pixel electrode and said common electrodes larger than that generated when said interlayer insulating film is of even thickness and flat structure.

31. At a minimum, Giantplus has known of the '474 patent at least as early as the filing date of the complaint. In addition, Giantplus has known of the '474 patent since May 9, 2018, when Giantplus was first notified that Giantplus was infringing the '474 patent.

32. Upon information and belief, since at least the above-mentioned date when Giantplus was on notice of its infringement, Giantplus has actively induced, under U.S.C. § 271(b), distributors, importers and/or consumers that purchase or sell TFT-LCD panels that include all of the limitations of one or more claims of the '474 patent to directly infringe one or more claims of the '474 patent by using, offering for sale, selling, and/or importing the TFT-LCD panels. Since at least the notice provided on the above-mentioned date, Giantplus does so with knowledge, or with willful blindness of the fact, that the induced acts constitute infringement of the '474 patent. Upon information and belief, Giantplus intends to cause, and has taken affirmative steps to induce, infringement by the distributors, importers, and/or consumers by, *inter alia*, creating advertisements that promote the infringing use of the TFT-LCD panels, creating established distribution channels for the TFT-LCD panels into and within the United States, manufacturing the TFT-LCD panels in conformity with U.S. laws and regulations, distributing or making available instructions or manuals for these products to purchasers and prospective buyers, and/or providing technical support, replacement parts, or services for these products to these purchasers in the United States. *See, e.g.,* About Giantplus webpage (*available at <http://www.giantplus.com.tw/en/about-us/about-giantplus>*) (showing Giantplus' "Worldwide Customers" including a North American location).

33. Upon information and belief, despite having knowledge of the '474 patent and knowledge that it is directly and/or indirectly infringing one or more claims of the '474 patent, Giantplus has nevertheless continued its infringing conduct and disregarded an objectively high likelihood of infringement. Giantplus' infringing activities relative to the '474 patent have been, and continue to be, willful, wanton, malicious, in bad-faith, deliberate, consciously wrongful, flagrant, characteristic of a pirate, and an egregious case of misconduct beyond typical

infringement such that Plaintiff is entitled under 35 U.S.C. § 284 to enhanced damages up to three times the amount found or assessed.

34. VPV has been damaged as a result of Giantplus' infringing conduct described in this Count. Giantplus is, thus, liable to VPV in an amount that adequately compensates VPV for Giantplus' infringements, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II

(INFRINGEMENT OF U.S. PATENT NO. 6,657,699)

35. Plaintiff incorporates paragraphs 1 through 34 herein by reference.

36. VPV is the assignee of the '699 patent, entitled "Liquid crystal display unit having pixel electrode encircled with partition wall and process for fabrication thereof," with ownership of all substantial rights in the '699 patent, including the right to exclude others and to enforce, sue, and recover damages for past and future infringements.

37. The '699 patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code. The '699 patent issued from U.S. Patent Application No. 09/901,034.

38. Giantplus has and continues to directly and/or indirectly infringe (by inducing infringement) one or more claims of the '699 patent in this judicial district and elsewhere in Texas and the United States.

39. Upon information and belief, Giantplus engages in the research, development, design, manufacture, and sales of TFT-LCD panels. *See* Giantplus' "R & D" page (*available at* <http://www.giantplus.com.tw/en/about-us/about-giantplus/r-d>) (describing that Giantplus "has an

experienced and up-to-date engineering team who has consistently dedicated to innovative technologies and product developments”).

40. Giantplus directly infringes the '699 patent via 35 U.S.C. § 271(a) by making, offering for sale, selling, and/or importing those TFT-LCD panels, their components, and/or products containing same that incorporate the fundamental technologies covered by the '699 patent, or by having its controlled subsidiaries, intermediaries, and/or agents do the same. Furthermore, upon information and belief, Giantplus sells and makes TFT-LCD panels outside of the United States, intending and/or knowing that those panels are destined for the United States and/or designing those products for sale in the United States, thereby directly infringing the '699 patent.

41. For example, Giantplus infringes claim 20 of the '699 patent via its LCD panel model nos. GPM1410A0 0418 and LM1452B02-1B. Those products include an “in-plane switching type liquid crystal display panel having a plurality of pixel areas, the panel comprising” each of the limitations of claim 20. The technology discussion above and the example accused TFT-LCD panel (model nos. GPM1410A0 0418 and LM1452B02-1B) provide context for Plaintiff’s allegations that each of those limitations are met. For example, model nos. GPM1410A0 0418 and LM1452B02-1B include liquid crystals between a pair of substrate structures and comprising optical elements within each of said plurality of pixel areas; a common electrode on one of said substrate structures for each pixel area; a pixel electrode for each pixel area offset from said common electrode on said one of said substrate structures, wherein said common electrode and said pixel electrode define said pixel area; a switching transistor on said one of said substrate structures and having a source connected to said pixel electrode, a data line extending outside a periphery of said pixel area and a gate electrode extending outside of said periphery; and a partition

wall structure formed on said common electrode of at least one of said pixel areas for separating said optical elements from the remaining liquid crystal.

42. Giantplus further infringes the '699 patent via 35 U.S.C. § 271(g) by selling, offering to sell, and/or importing TFT-LCD panels, their components, and/or products containing same, that are made by a process covered by the '699 patent. Upon information and belief, the infringing TFT-LCD panels, their components, and/or products containing same are not materially changed by subsequent processes, and they are neither trivial nor nonessential components of another product.

43. At a minimum, Giantplus has known of the '699 patent at least as early as the filing date of the complaint. In addition, Giantplus has known of the '699 patent since May 9, 2018, when Giantplus was first notified that Giantplus was infringing the '699 patent.

44. Upon information and belief, since at least the above-mentioned date when Giantplus was on notice of its infringement, Giantplus has actively induced, under U.S.C. § 271(b), distributors, importers and/or consumers that purchase or sell TFT-LCD panels that include or are made using all of the limitations of one or more claims of the '699 patent to directly infringe one or more claims of the '699 patent by using, offering for sale, selling, and/or importing the TFT-LCD panels. Since at least the notice provided on the above-mentioned date, Giantplus does so with knowledge, or with willful blindness of the fact, that the induced acts constitute infringement of the '699 patent. Upon information and belief, Giantplus intends to cause, and has taken affirmative steps to induce, infringement by the distributors, importers, and/or consumers by, inter alia, creating advertisements that promote the infringing use of the TFT-LCD panels, creating established distribution channels for the TFT-LCD panels into and within the United States, manufacturing the TFT-LCD panels in conformity with U.S. laws and regulations, distributing or

making available instructions or manuals for these products to purchasers and prospective buyers, and/or providing technical support, replacement parts, or services for these products to these purchasers in the United States. *See, e.g.*, About Giantplus webpage (*available at <http://www.giantplus.com.tw/en/about-us/about-giantplus>*) (showing Giantplus' "Worldwide Customers" including a North American location).

45. Upon information and belief, despite having knowledge of the '699 patent and knowledge that it is directly and/or indirectly infringing one or more claims of the '699 patent, Giantplus has nevertheless continued its infringing conduct and disregarded an objectively high likelihood of infringement. Giantplus' infringing activities relative to the '699 patent have been, and continue to be, willful, wanton, malicious, in bad-faith, deliberate, consciously wrongful, flagrant, characteristic of a pirate, and an egregious case of misconduct beyond typical infringement such that Plaintiff is entitled under 35 U.S.C. § 284 to enhanced damages up to three times the amount found or assessed.

46. VPV has been damaged as a result of Giantplus' infringing conduct described in this Court. Giantplus is, thus, liable to VPV in an amount that adequately compensates VPV for Giantplus' infringements, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

INJUNCTIVE RELIEF

47. Plaintiff seeks preliminary and permanent injunctions as a result of Giantplus' infringement of the Asserted Patents. Plaintiff is likely to succeed in showing that Giantplus infringes the Asserted Patents. Because of that infringement, Plaintiff has suffered an irreparable injury, and the remedies available at law, such as monetary damages, are inadequate to compensate for that injury. For example, if Plaintiff must enforce a judgment against Giantplus in Taiwan, Plaintiff will face a historically challenging burden in persuading a Taiwanese court to enforce a

judgment from a U.S. court, likely preventing Plaintiff from obtaining any monetary damages from Giantplus. Considering the balance of hardships between the Plaintiff and Giantplus, a remedy in equity is warranted; and the public interest would not be disserved by a permanent or preliminary injunction.

CONCLUSION

48. Plaintiff is entitled to recover from Giantplus the damages sustained by Plaintiff as a result of Giantplus' wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court.

49. Plaintiff has incurred and will incur attorneys' fees, costs, and expenses in the prosecution of this action. The circumstances of this dispute may give rise to an exceptional case within the meaning of 35 U.S.C. § 285, and Plaintiff is entitled to recover its reasonable and necessary attorneys' fees, costs, and expenses.

JURY DEMAND

50. Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

51. Plaintiff respectfully requests that the Court find in its favor and against Giantplus, and that the Court grant Plaintiff the following relief:

1. A judgment that Giantplus has infringed the Asserted Patents as alleged herein, directly and/or indirectly by way of inducing infringement of such patents;
2. A judgment for an accounting of all damages sustained by Plaintiff as a result of the acts of infringement by Giantplus;

3. A preliminary and permanent injunction against Giantplus, its subsidiaries, or anyone acting on its behalf from making, using, selling, offering to sell, or importing any products that infringe the Asserted Patents, and any other injunctive relief the Court deems just and equitable;
4. A judgment and order requiring Giantplus to pay Plaintiff damages under 35 U.S.C. § 284, including up to treble damages as provided by 35 U.S.C. § 284, and any royalties determined to be appropriate;
5. A judgment and order requiring Giantplus to pay Plaintiff pre-judgment and post-judgment interest on the damages awarded;
6. A judgment and order finding this to be an exceptional case and requiring Giantplus to pay the costs of this action (including all disbursements) and attorneys' fees as provided by 35 U.S.C. § 285; and
7. Such other and further relief as the Court deems just and equitable.

Dated: May 23, 2019

Respectfully submitted,

/s/Patrick J. Conroy w/permission Claire A. Henry

Patrick J. Conroy
Texas Bar No. 24012448
T. William Kennedy Jr.
Texas Bar No. 24055771
Terry A. Saad
Texas Bar No. 24066015

Bragalone Conroy PC

2200 Ross Avenue
Suite 4500W
Dallas, TX 75201
Tel: (214) 785-6670
Fax: (214) 785-6680
pconroy@bcpc-law.com
bkennedy@bcpc-law.com
tsaad@bcpc-law.com

Of Counsel:

T. John Ward, Jr.
Texas State Bar No. 00794818
Email: jw@wsfirm.com
Claire Abernathy Henry
Texas State Bar No. 24053063
Email: Claire@wsfirm.com

WARD, SMITH, & HILL, PLLC

P.O. Box 1231
Longview, TX 75606
Telephone: (903) 757-6400
Facsimile: (903) 757-2323