

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

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

GOVISION, LLC,

Defendant.

Case No. 2:18-cv-00100-JRG-RSP

**LEAD CASE**

**JURY TRIAL DEMANDED**

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

GLUX VISUAL EFFECTS TECH  
(SHENZHEN) CO.,

Defendant.

Case No. 2:18-cv-00099-JRG-RSP

**CONSOLIDATED CASE**

**JURY TRIAL DEMANDED**

**FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Ultravision Technologies, LLC (“Ultravision”), for its First Amended Complaint against defendant Glux Visual Effects Tech (Shenzhen) Co. (“Defendant”), alleges as follows:

**THE PARTIES**

1. Ultravision is a limited liability company organized and existing under the laws of the State of Delaware and is registered to do business in Texas. Ultravision has its principal place of business at 4542 McEwen Road, Dallas, Texas 75244.

2. Upon information and belief, Defendant is a corporation organized and existing under the laws of China, with a principal place of business located at Donghuan 2<sup>nd</sup> Road, Longhua District, Shenzhen, Guangdong, China.

**JURISDICTION**

3. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.* This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant. Upon information and belief, Defendant, directly and/or through intermediaries, regularly conducts business and has committed acts of patent infringement and/or has induced acts of patent infringement by others in this Judicial District and/or has contributed to patent infringement by others in this Judicial District, the State of Texas, and elsewhere in the United States.

5. Venue is proper over Defendant in this judicial district pursuant to 28 U.S.C. § 1391 because, among other things, Defendant is a foreign defendant not resident in the United States, and thus may be sued in any judicial district pursuant to 28 U.S.C. § 1391(c)(3).

6. Defendant is subject to this Court's 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 past infringing activities, (b) regularly doing or soliciting business in Texas, and/or (c) engaging in persistent conduct and/or deriving substantial revenue from goods and services provided to customers in Texas.

**PATENTS-IN-SUIT**

7. On June 2, 2015, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,047,791 (the "'791 Patent") entitled "Sign Construction with Sectional Sign Assemblies and Installation Kit and Method of Using Same." A true and correct copy of the '791 Patent is available at <https://pdfpiw.uspto.gov/.piw?docid=9047791>.

8. On December 8, 2015, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,207,904 (the "'904 Patent") entitled "Multi-Panel Display with Hot

Swappable Display Panels and Methods of Servicing Thereof.” A true and correct copy of the ’904 Patent is available at <https://pdfpiw.uspto.gov/.piw?docid=9207904>.

9. On May 2, 2017, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,642,272 (the “’272 Patent”) entitled “Method for Modular Multi-Panel Display Wherein Each Display is Sealed to be Waterproof and Includes Array of Display Elements Arranged to Form Display Panel Surface.” A true and correct copy of the ’272 Patent is available at <https://pdfpiw.uspto.gov/.piw?docid=9642272>.

10. On May 30, 2017, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,666,105 (the “’105 Patent”) entitled “Sign Construction with Modular Wire Harness Arrangements and Methods of Using Same for Backside to Frontside Power and Data Distribution Schemes.” A true and correct copy of the ’105 Patent is available at <https://pdfpiw.uspto.gov/.piw?docid=9666105>.

11. On March 13, 2018, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,916,782 (the “’782 Patent”) entitled “Modular Display Panel.” A true and correct copy of the ’782 Patent is available at <http://pdfpiw.uspto.gov/.piw?docid=9916782>.

12. On May 22, 2018, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,978,294 (the “’294 Patent”) entitled “Modular Display Panel.” A true and correct copy of the ’294 Patent is available at <https://pdfpiw.uspto.gov/.piw?docid=9978294>.

13. On May 29, 2018, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,984,603 (the “’603 Patent”) entitled “Modular Display Panel.” A true and correct copy of the ’603 Patent is available at <https://pdfpiw.uspto.gov/.piw?docid=9984603>.

14. On June 5, 2018, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,990,869 (the “’869 Patent”) entitled “Modular Display Panel.” A true and correct copy of the ’869 Patent is available at <https://pdfpiw.uspto.gov/piw?docid=9990869>.

15. On April 2, 2019, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 10,248,372 (the “’372 Patent”) entitled “Modular Display Panels.” A true and correct copy of the ’372 Patent is available at <https://pdfpiw.uspto.gov/piw?docid=10248372>.

16. Ultravision is the sole and exclusive owner of all right, title and interest in and to the ’791 Patent, the ’904 Patent, the ’272 Patent, the ’105 Patent, the ’782 Patent, the ’294 Patent, the ’603 Patent, the ’869 Patent, and the ’372 Patent (collectively, the “Patents-in-Suit”), and holds the exclusive right to take all actions necessary to enforce its rights to the Patents-in-Suit, including the filing of this patent infringement action. Ultravision also has the right to recover all damages for past, present, and future infringement of the Patents-in-Suit and to seek injunctive relief as appropriate under the law.

17. Ultravision has at all times complied with the marking provisions of 35 U.S.C. § 287 with respect to the Patents-in-Suit. Ultravision references its patents on its website, <http://www.ultravisioninternational.com>, and also references its patents and its website in the product packaging for its products.

### **DEFENDANT’S PRODUCTS**

18. Upon information and belief, Defendant, either directly or through intermediaries, makes, uses, offers to sell, or sells within the United States or imports into the United States LED Displays, such as Defendant’s IDsn, ODsn, SEfl, TVsn, CFOsn, and MOsn, series products.

19. An image of Defendant's IDsn series product is shown below:<sup>1</sup>



20. An image of Defendant's ODSn series product is shown below:<sup>2</sup>

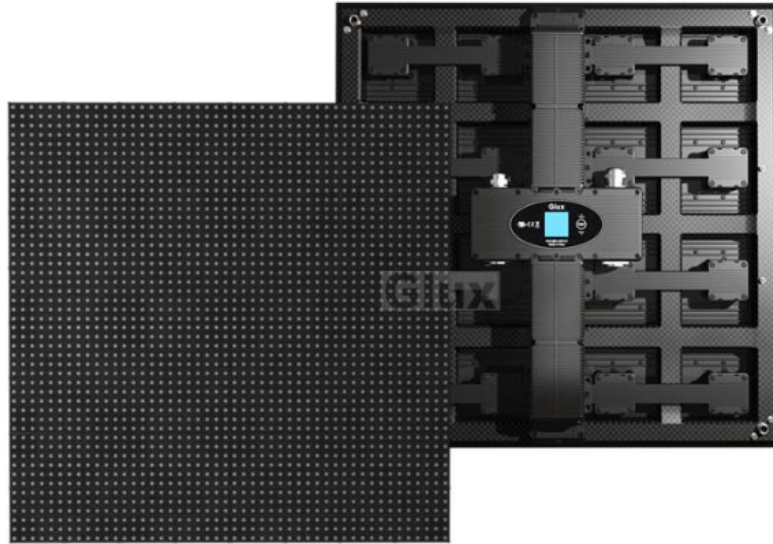


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<sup>1</sup> <http://www.gluxled.com/Products/info/id/41.html>;  
<http://www.gluxled.com/Products/info/id/91.html>

<sup>2</sup> <http://www.gluxled.com/Products/info/id/49.html>

21. An image of Defendant's SEfl series product is shown below:<sup>3</sup>



22. An image of Defendant's TVsn series product is shown below:<sup>4</sup>



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<sup>3</sup> <http://www.gluxled.com/Products/info/id/49.html>

<sup>4</sup> <http://www.gluxled.com/Products/info/id/45.html>

23. An image of Defendant's CFOsn series product is shown below:<sup>5</sup>



24. An image of Defendant's MOsn series product is shown below:<sup>6</sup>



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<sup>5</sup> <http://www.gluxled.com/Products/info/id/90.html>

<sup>6</sup> <http://www.gluxled.com/Products/info/id/47.html>

**COUNT I**  
**(Infringement of the '791 Patent)**

25. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

26. Ultravision has not licensed or otherwise authorized Defendant to make, use, offer to sell, or sell within the United States or import into the United States any products that embody the inventions of the '791 Patent.

27. Defendant has directly infringed and continues to directly infringe the '791 Patent, including at least claim 12, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '791 Patent. Such products include LED displays, such as Defendant's IDsn, ODsn, SEfl, and TVsn series products.

28. Upon information and belief, each of Defendant's IDsn, ODsn, SEfl, and TVsn series products comprises a plurality of display modules.

29. Upon information and belief, each of Defendant's IDsn, ODsn, SEfl, and TVsn series products comprises a plurality of sign sections, each having a front-facing portion and a rear-facing portion, the front portion defining at least two vertical columns of bays that span and define a height of the sign, each bay configured to receive one of the display modules, the rear portion configured to be attached to a beam surface of the existing signage structure to allow most off a rear surface of the rear portion to be exposed for servicing.

30. Upon information and belief, each of Defendant's IDsn, ODsn, SEfl, and TVsn series product comprises a plurality of power routing systems each including at least one node associated with each sign section with a plurality of individual power extensions each extending from one node to one of the bays.



31. Defendant has indirectly infringed and continues to indirectly infringe one or more claims of the '791 Patent, including at least claim 12, by knowingly and intentionally inducing others, including customers, installers, and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that include infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's IDsn, ODsn, SEfl, and TVsn series products.

32. Defendant knowingly and intentionally induces infringement of one or more claims of the '791 Patent, including at least claim 12, in violation of 35 U.S.C. § 271(b), by taking active steps, directly and/or through intermediaries, to encourage others, including customers, installers, and end-users, to make, use, offer to sell, and/or sell within the United States and/or import into the United States products, including but not limited to Defendant's IDsn, ODsn, SEfl, and TVsn series products, with the specific intent to cause them to use the accused products in an infringing manner. Such steps by Defendant includes, among other things, advising or directing customers, installers, and end-users to use the accused products in an infringing manner; advertising and promoting the use of the accused products in an infringing manner; and/or providing manuals, guides, installation instructions and other documentation that guide end-users to use the accused products in an infringing manner. Defendant is performing these steps with knowledge of the '791 Patent and with knowledge that the induced acts constitute infringement, at least as of the date of the complaint filed against them in this action. Upon information and belief, Defendant is aware that the normal and customary use of the accused products by Defendant's customers would infringe the '791 Patent. Defendant's inducement is ongoing.

33. Upon information and belief, with knowledge and intent, or with willful blindness, Defendant is encouraging and facilitating infringement of one or more claims of the '791 Patent, including at least claim 12, by others. For example, upon information and belief, Defendant sells, supplies, or otherwise provides products, including but not limited to Defendant's IDsn, ODSn, SEfl, and TVsn series products, to customers, installers, and end users, knowing that these entities intend to make, use, offer to sell, and/or sell the products within the United States and/or import the products into the United States in an infringing manner. Defendant took active steps, directly and/or through intermediaries, with the specific intent to cause others to import, sell, or offer to sell the accused products in a manner that infringes one or more of the claims of the '791 Patent, including at least claim 12. Such steps by Defendant includes, among other things, making or selling the accused products outside of the United States for importation into or sale in the United States, or knowing that such importation or sale would occur; and directing, facilitating, or influencing its affiliates, or third-party manufacturers, shippers, distributors, retailers, or other persons acting on its or their behalf, to import, sell, or offer to sell the accused products in an infringing manner. Defendant performed these steps with knowledge of the '791 Patent, and with knowledge that the induced acts constitute infringement, at least as of the date of the filing of this First Amended Complaint. Defendant performed such steps in order to profit from the eventual sale of the accused products in the United States. Defendant's infringement is ongoing.

34. Defendant has induced and continues to induce infringement by others of one or more claims of the '791 Patent, including at least claim 12, including customers, installers, and end users, with the intent to cause infringing acts by others or, in the alternative, with the belief

that there was a high probability that others, including customers, installers, and end users, infringe the '791 Patent, but while remaining willfully blind to the infringement.

35. Defendant knowingly and intentionally contributes to the direct infringement of others of one or more claims of the '791 Patent, including at least claim 12, in violation of 35 U.S.C. § 271(c), by offering to sell and/or selling within the United States and/or importing into the United States infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's IDsn, ODsn, SEfl, and TVsn series products and/or components thereof. Defendant's LED displays, including Defendant's IDsn, ODsn, SEfl, and TVsn series products, are components of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention. Defendant has knowledge that its LED displays, including Defendant's IDsn, ODsn, SEfl, and TVsn series products, are especially made or especially adapted for use in an infringement of the '791 Patent, and are not staple articles or commodities of commerce suitable for substantial noninfringing use.

36. Defendant has had knowledge of the '791 Patent at least since the filing of this First Amended Complaint.

37. Upon information and belief, Defendant has intentionally avoided learning of the patent rights of others. For example, upon information and belief, Defendant has a policy or practice of not reviewing the patents of others, has complied with that policy or practice, and thus has been willfully blind of Ultravision's patent rights.

38. Ultravision has suffered damages as a result of Defendant's direct and indirect infringement of the '791 Patent in an amount to be proved at trial.

39. Ultravision has suffered and will continue to suffer irreparable harm as a result of Defendant's infringement of the '791 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

**COUNT II**  
**(Infringement of the '904 Patent)**

40. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

41. Ultravision has not licensed or otherwise authorized Defendant to make, use, offer to sell, or sell within the United States or import into the United States any products that embody the inventions of the '904 Patent.

42. Defendant has directly infringed and continues to directly infringe the '904 Patent, including at least claim 1, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '904 Patent. Such products include LED displays, such as Defendant's IDsn, ODSn, SEfl, TVsn, CFOsn, and MOsn products.

43. Upon information and belief, each of Defendant's IDsn, ODSn, SEfl, TVsn, CFOsn, and MOsnseries products allow a direct infringer, such as a sign owner, to provide access to a multi-panel display comprising a plurality of display panels, each panel of the plurality of display panels being mounted onto a mechanical support structure.

44. Upon information and belief, each of Defendant's IDsn, ODSn, SEfl, TVsn, CFOsn, and MOsn, series products allow a direct infringer, such as a sign owner, to identify a defective panel from the plurality of display panels, wherein identifying the defective panel comprises receiving a signal from an adjacent panel indicating the defect.

45. Upon information and belief, each of Defendant's IDsn, ODSn, SEfl, TVsn, CFOsn, and MOsn, series products allow a direct infringer, such as a sign owner, to, without powering down the multi-panel display, disconnect electrical connection to the defective panel and remove the defective panel from the mechanical support structure.

46. Upon information and belief, each of Defendant's IDsn, ODSn, SEfl, TVsn, CFOsn, and MOsn series products allow a direct infringer, such as a sign owner, to attach a replacement display panel to the mechanical support structure at the location of the defective panel.

47. Upon information and belief, each of Defendant's IDsn, ODSn, SEfl, TVsn, CFOsn, and MOsn series products allow a direct infringer, such as a sign owner, to connect power to the replacement display panel, wherein one or more of the remaining of the plurality of display panels continue to display during the time the defective panel is disconnected and removed, and the replacement display is attached.

48. Defendant has indirectly infringed and continues to indirectly infringe one or more claims of the '904 Patent, including at least claim 1, by knowingly and intentionally inducing others, including customers, installers, and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that include infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's IDsn, ODSn, SEfl, TVsn, CFOsn, and MOsn series products.

49. Defendant knowingly and intentionally induces infringement of one or more claims of the '904 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(b), by taking active steps, directly and/or through intermediaries, to encourage others, including customers,

installers, and end-users, to make, use, offer to sell, and/or sell within the United States and/or import into the United States products, including but not limited to Defendant's IDsn, ODsn, SEfl, TVsn, CFOsn, and MOsn series products, with the specific intent to cause them to use the accused products in an infringing manner. Such steps by Defendant includes, among other things, advising or directing customers, installers, and end-users to use the accused products in an infringing manner; advertising and promoting the use of the accused products in an infringing manner; and/or providing manuals, guides, installation instructions and other documentation that guide end-users to use the accused products in an infringing manner. Defendant is performing these steps with knowledge of the '904 Patent and with knowledge that the induced acts constitute infringement, at least as of the date of the complaint filed against them in this action. Upon information and belief, Defendant is aware that the normal and customary use of the accused products by Defendant's customers would infringe the '904 Patent. Defendant's inducement is ongoing.

Upon information and belief, with knowledge and intent, or with willful blindness, Defendant is encouraging and facilitating infringement of one or more claims of the '904 Patent, including at least claim 1, by others. For example, upon information and belief, Defendant sells, supplies, or otherwise provides products, including but not limited to Defendant's IDsn, ODsn, SEfl, TVsn, CFOsn, and MOsn series products, to customers, installers, and end users knowing that these entities intend to make, use, offer to sell, and/or sell the products within the United States and/or import the products into the United States in an infringing manner. Defendant took active steps, directly and/or through intermediaries, with the specific intent to cause others to import, sell, or offer to sell the accused products in a manner that infringes one or more of the claims of the '904 Patent, including at least claim 1. Such steps by Defendant includes, among

other things, making or selling the accused products outside of the United States for importation into or sale in the United States, or knowing that such importation or sale would occur; and directing, facilitating, or influencing its affiliates, or third-party manufacturers, shippers, distributors, retailers, or other persons acting on its or their behalf, to import, sell, or offer to sell the accused products in an infringing manner. Defendant performed these steps with knowledge of the '904 Patent, and with knowledge that the induced acts constitute infringement, at least as of the filing date of this First Amended Complaint. Defendant performed such steps in order to profit from the eventual sale of the accused products in the United States. Defendant's inducement is ongoing.

50. Defendant has induced and continues to induce infringement by others of one or more claims of the '904 Patent, including at least claim 1, including customers, installers, and end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including customers, installers, and end users, infringe the '904 Patent, but while remaining willfully blind to the infringement.

51. Defendant knowingly and intentionally contributes to the direct infringement of others of one or more claims of the '904 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(c), by offering to sell and/or selling within the United States and/or importing into the United States infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's IDsn, ODsn, SEfl, TVsn, CFOsn, and MOsn, series products and/or components thereof. Defendant's LED displays, including Defendant's IDsn, ODsn, SEfl, TVsn, CFOsn, and MOsn series products, are components of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention. Defendant has

knowledge that its LED displays, including Defendant's IDsn, ODSn, SEfl, TVsn, CFOsn, and MOsn series products, are especially made or especially adapted for use in an infringement of the '904 Patent, and are not staple articles or commodities of commerce suitable for substantial noninfringing use.

52. Defendant has had knowledge of the '904 Patent at least since the filing of this First Amended Complaint.

53. Upon information and belief, Defendant has intentionally avoided learning of the patent rights of others. For example, upon information and belief, Defendant has a policy or practice of not reviewing the patents of others, has complied with that policy or practice, and thus has been willfully blind of Ultravision's patent rights.

54. Ultravision has suffered damages as a result of Defendant's direct and indirect infringement of the '904 Patent in an amount to be proved at trial.

55. Ultravision has suffered and will continue to suffer irreparable harm as a result of Defendant's infringement of the '904 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

**COUNT III**  
**(Infringement of the '272 Patent)**

56. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

57. Ultravision has not licensed or otherwise authorized Defendant to make, use, offer to sell, or sell within the United States or import into the United States any products that embody the inventions of the '272 Patent.

58. Defendant has directly infringed and continues to directly infringe the '272 Patent, including at least claim 1, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, and/or selling



within the United States and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '272 Patent. Such products include LED displays, such as Defendant's ODSn, SEfl, and CFOsn products.

59. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products allows a direct infringer, such as a sign installer, to assemble a mechanical support structure.

60. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products allow a direct infringer, such as a sign installer, to, at a first location, detachably mount a plurality of display panels to the mechanical support structure so as to assemble a plurality of integrated display panel sub-assemblies, each sub-assembly including a plurality of display panels arranged in rows and columns.

61. Upon information and belief, each display panel of each of Defendant's ODSn, SEfl, and CFOsn series products includes an array of display elements comprising a plurality of rows of display elements and a plurality of columns of display elements so as to form a display panel surface, where the display panel surface is sealed to be waterproof.

62. Upon information and belief, each display panel of each of Defendant's ODSn, SEfl, and CFOsn series products includes a display driver coupled to the array of display elements.

63. Upon information and belief, each display panel of each of Defendant's ODSn, SEfl, and CFOsn series products includes a housing.

64. Upon information and belief, each display panel of each of Defendant's ODSn, SEfl, and CFOsn series products includes a receiver circuit disposed inside the housing.

65. Upon information and belief, each display panel of each of Defendant's ODSn, SEfl, and CFOsn series products includes a power supply electrically coupled to the receiver circuit and the display driver, wherein the power supply is configured to convert an alternative current (AC) received at an input and output a direct current (DC).

66. Upon information and belief, the mechanical support structure of each of Defendant's ODSn, SEfl, and CFOsn series products is configured to provide mechanical support to the plurality of display panels of without providing waterproof sealing.

67. Upon information and belief, the plurality of integrated display panel sub-assemblies of each of Defendant's ODSn, SEfl, and CFOsn series products are configured to be moved to a second location remote from the first location.

68. Upon information and belief, the plurality of integrated display panel sub-assemblies of each of Defendant's ODSn, SEfl, and CFOsn series products and are configured to be built into a multi-panel display by, at the second location, assembling the sub-assemblies into an integrated display panel.

69. Defendant has indirectly infringed and continues to indirectly infringe one or more claims of the '272 Patent, including at least claim 1, by knowingly and intentionally inducing others, including customers, installers, and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that include infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products.

70. Defendant knowingly and intentionally induces infringement of one or more claims of the '272 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(b), by taking

active steps, directly and/or through intermediaries, to encourage others, including customers, installers, and end-users, to make, use, offer to sell, and/or sell within the United States and/or import into the United States products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, with the specific intent to cause them to use the accused products in an infringing manner. Such steps by Defendant includes, among other things, advising or directing customers, installers, and end-users to use the accused products in an infringing manner; advertising and promoting the use of the accused products in an infringing manner; and/or providing manuals, guides, installation instructions and other documentation that guide end-users to use the accused products in an infringing manner. Defendant is performing these steps with knowledge of the '272 Patent and with knowledge that the induced acts constitute infringement, at least as of the date of the complaint filed against them in this action. Upon information and belief, Defendant is aware that the normal and customary use of the accused products by Defendant's customers would infringe the '272 Patent. Defendant's inducement is ongoing.

Upon information and belief, with knowledge and intent, or with willful blindness, Defendant is encouraging and facilitating infringement of one or more claims of the '272 Patent, including at least claim 1, by others. For example, upon information and belief, Defendant sells, supplies, or otherwise provides products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, to customers, sign installers, and end users knowing that these entities intend to make, use, offer to sell, and/or sell the products within the United States and/or import the products into the United States in an infringing manner. Defendant took active steps, directly and/or through intermediaries, with the specific intent to cause others to import, sell, or offer to sell the accused products in a manner that infringes one or more of the claims of the '272 Patent, including at least claim 1. Such steps by Defendant includes, among other things, making

or selling the accused products outside of the United States for importation into or sale in the United States, or knowing that such importation or sale would occur; and directing, facilitating, or influencing its affiliates, or third-party manufacturers, shippers, distributors, retailers, or other persons acting on its or their behalf, to import, sell, or offer to sell the accused products in an infringing manner. Defendant performed these steps with knowledge of the '272 Patent, and with knowledge that the induced acts constitute infringement, at least as of the filing date of this First Amended Complaint. Defendant performed such steps in order to profit from the eventual sale of the accused products in the United States. Defendant's inducement is ongoing.

71. Defendant has induced and continues to induce infringement by others of one or more claims of the '272 Patent, including at least claim 1, including customers, installers, and end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including customers, installers, and end users, infringe the '272 Patent, but while remaining willfully blind to the infringement.

72. Defendant knowingly and intentionally contributes to the direct infringement of others of one or more claims of the '272 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(c), by offering to sell and/or selling within the United States and/or importing into the United States infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products and/or components thereof. Defendant's LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are components of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention. Defendant has knowledge that its LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are especially made or especially adapted

for use in an infringement of the '272 Patent, and are not staple articles or commodities of commerce suitable for substantial noninfringing use.

73. Defendant has had knowledge of the '272 Patent at least since the filing of this First Amended Complaint.

74. Ultravision has suffered damages as a result of Defendant's direct and indirect infringement of the '272 Patent in an amount to be proved at trial.

75. Ultravision has suffered and will continue to suffer irreparable harm as a result of Defendant's infringement of the '272 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

**COUNT IV**  
**(Infringement of the '105 Patent)**

76. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

77. Ultravision has not licensed or otherwise authorized Defendant to make, use, offer to sell, or sell within the United States or import into the United States any products that embody the inventions of the '105 Patent.

78. Defendant has directly infringed and continues to directly infringe the '105 Patent, including at least claim 15, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '105 Patent. Such products include LED displays, such as Defendant's ODSn, SEfl, and CFOsn series products.

79. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises at least one structural frame configured to be mounted to a front side surface of a mounting structure, said at least one structural frame defining a plurality of structural bay

members configured in adjacent columns for receiving and removably supporting therein a corresponding plurality of weatherized display modules.

80. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprise at least one preformed wiring harness for routing low voltage power within said plurality of structural bay members

81. Upon information and belief, at least one preformed wiring harness of each of Defendant's ODSn, SEfl, and CFOsn series products is provided with at least one power introduction node to facilitate providing separate power branches for distributing power between adjacent columns of the structural bay members.

82. Upon information and belief, at least one preformed wiring harness of each of Defendant's ODSn, SEfl, and CFOsn series products is provided with at least one structural bay locator node to facilitate providing a low voltage power branch to at least an individual one of said plurality of structural bay members.

83. Defendant has indirectly infringed and continues to indirectly infringe one or more claims of the '105 Patent, including at least claim 15, by knowingly and intentionally inducing others, including customers, installers, and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that include infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products.

84. Defendant knowingly and intentionally induces infringement of one or more claims of the '105 Patent, including at least claim 15, in violation of 35 U.S.C. § 271(b), by taking active steps, directly and/or through intermediaries, to encourage others, including

customers, installers, and end-users, to make, use, offer to sell, and/or sell within the United States and/or import into the United States products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, with the specific intent to cause them to use the accused products in an infringing manner. Such steps by Defendant includes, among other things, advising or directing customers, installers, and end-users to use the accused products in an infringing manner; advertising and promoting the use of the accused products in an infringing manner; and/or providing manuals, guides, installation instructions and other documentation that guide end-users to use the accused products in an infringing manner. Defendant is performing these steps with knowledge of the '105 Patent and with knowledge that the induced acts constitute infringement, at least as of the date of the complaint filed against them in this action. Upon information and belief, Defendant is aware that the normal and customary use of the accused products by Defendant's customers would infringe the '105 Patent. Defendant's inducement is ongoing.

85. Upon information and belief, with knowledge and intent, or with willful blindness, Defendant is encouraging and facilitating infringement of one or more claims of the '105 Patent, including at least claim 15, by others. For example, upon information and belief, Defendant sells, supplies, or otherwise provides products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, to customers, installers, and end users knowing that these entities intend to make, use, offer to sell, and/or sell the products within the United States and/or import the products into the United States in an infringing manner. Defendant took active steps, directly and/or through intermediaries, with the specific intent to cause others to import, sell, or offer to sell the accused products in a manner that infringes one or more of the claims of the '105 Patent, including at least claim 15. Such steps by Defendant

includes, among other things, making or selling the accused products outside of the United States for importation into or sale in the United States, or knowing that such importation or sale would occur; and directing, facilitating, or influencing its affiliates, or third-party manufacturers, shippers, distributors, retailers, or other persons acting on its or their behalf, to import, sell, or offer to sell the accused products in an infringing manner. Defendant performed these steps with knowledge of the '105 Patent, and with knowledge that the induced acts constitute infringement, at least as of the date of the filing of this First Amended Complaint. Defendant performed such steps in order to profit from the eventual sale of the accused products in the United States. Defendant's inducement is ongoing.

86. Defendant has induced and continues to induce infringement by others of one or more claims of the '105 Patent, including at least claim 15, including customers, installers, and end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including customers, installers, and end users, infringe the '105 Patent, but while remaining willfully blind to the infringement.

87. Defendant knowingly and intentionally contributes to the direct infringement of others of one or more claims of the '105 Patent, including at least claim 15, in violation of 35 U.S.C. § 271(c), by offering to sell and/or selling within the United States and/or importing into the United States infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products and/or components thereof. Defendant's LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are components of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention. Defendant has knowledge that its LED displays, including



Defendant's ODSn, SEfl, and CFOsn series products, are especially made or especially adapted for use in an infringement of the '105 Patent, and are not staple articles or commodities of commerce suitable for substantial noninfringing use.

88. Defendant has had knowledge of the '105 Patent at least since the filing of this First Amended Complaint.

89. Upon information and belief, Defendant has intentionally avoided learning of the patent rights of others. For example, upon information and belief, Defendant has a policy or practice of not reviewing the patents of others, has complied with that policy or practice, and thus has been willfully blind of Ultravision's patent rights.

90. Ultravision has suffered damages as a result of Defendant's direct and indirect infringement of the '105 Patent in an amount to be proved at trial.

91. Ultravision has suffered and will continue to suffer irreparable harm as a result of Defendant's infringement of the '105 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

**COUNT V**  
**(Infringement of the '782 Patent)**

92. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

93. Ultravision has not licensed or otherwise authorized Defendant to make, use, offer to sell, or sell within the United States or import into the United States any products that embody the inventions of the '782 Patent.

94. Defendant has directly infringed and continues to directly infringe the '782 Patent, including at least claim 1, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or selling within the United States and/or importing into the United States products that satisfy each

and every limitation of one or more claims of the '782 Patent. Such products include LED displays, such as Defendant's ODSn, SEfl, and CFOsn series products.

95. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products is a modular display panel.

96. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a shell comprising a first thermally conductive material, wherein the sidewalls of the shell comprise plastic.

97. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a printed circuit board disposed in the shell.

98. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprise a plurality of LEDs attached to a first side of the printed circuit board.

99. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a driver circuit disposed in the shell and coupled to the plurality of LEDs from a second side of the printed circuit board.

100. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a power supply unit for powering the LEDs, the printed circuit board being disposed between the power supply unit and the plurality of LEDs.

101. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a second thermally conductive material disposed between the power supply unit and an outer back side of the panel.

102. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a protective structure disposed over the first side of the printed circuit board, wherein the modular display panel is sealed to be waterproof.

103. Defendant has indirectly infringed and continues to indirectly infringe one or more claims of the '782 Patent, including at least claim 1, by knowingly and intentionally inducing others, including customers, installers, and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that include infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products.

104. Defendant knowingly and intentionally induces infringement of one or more claims of the '782 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(b), by taking active steps, directly and/or through intermediaries, to encourage others, including customers, installers, and end-users, to make, use, offer to sell, and/or sell within the United States and/or import into the United States products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, with the specific intent to cause them to use the accused products in an infringing manner. Such steps by Defendant includes, among other things, advising or directing customers, installers, and end-users to use the accused products in an infringing manner; advertising and promoting the use of the accused products in an infringing manner; and/or providing manuals, guides, installation instructions and other documentation that guide end-users to use the accused products in an infringing manner. Defendant is performing these steps with knowledge of the '782 Patent and with knowledge that the induced acts constitute infringement, at least as of the date of the complaint filed against them in this action. Upon information and belief, Defendant is aware that the normal and customary use of the accused products by Defendant's customers would infringe the '782 Patent. Defendant's inducement is ongoing.

105. Upon information and belief, with knowledge and intent, or with willful blindness, Defendant is encouraging and facilitating infringement of one or more claims of the '782 Patent, including at least claim 1, by others. For example, upon information and belief, Defendant sells, supplies, or otherwise provides products, including but not limited to Defendant's ODsn, SEfl, and CFOsn series products, to customers, installers, and end users knowing that these entities intend to make, use, offer to sell, and/or sell the products within the United States and/or import the products into the United States in an infringing manner. Defendant took active steps, directly and/or through intermediaries, with the specific intent to cause others to import, sell, or offer to sell the accused products in a manner that infringes one or more of the claims of the '782 Patent, including at least claim 1. Such steps by Defendant includes, among other things, making or selling the accused products outside of the United States for importation into or sale in the United States, or knowing that such importation or sale would occur; and directing, facilitating, or influencing its affiliates, or third-party manufacturers, shippers, distributors, retailers, or other persons acting on its or their behalf, to import, sell, or offer to sell the accused products in an infringing manner. Defendant performed these steps with knowledge of the '782 Patent, and with knowledge that the induced acts constitute infringement, at least as of March 27, 2018 — *i.e.*, the date of the filing of the original Complaint by Ultravision in this District. Defendant performed such steps in order to profit from the eventual sale of the accused products in the United States. Defendant's inducement is ongoing.

106. Defendant has induced and continues to induce infringement by others of one or more claims of the '782 Patent, including at least claim 1, including customers, installers, and end users, with the intent to cause infringing acts by others or, in the alternative, with the belief

that there was a high probability that others, including customers, installers, and end users, infringe the '782 Patent, but while remaining willfully blind to the infringement.

107. Defendant knowingly and intentionally contributes to the direct infringement of others of one or more claims of the '782 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(c), by offering to sell and/or selling within the United States and/or importing into the United States infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products and/or components thereof.

108. Defendant's LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are components of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention. Defendant has knowledge that its LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are especially made or especially adapted for use in an infringement of the '782 Patent, and are not staple articles or commodities of commerce suitable for substantial noninfringing use.

109. Defendant has had knowledge of the '782 Patent at least since the filing of the original Complaint against it in this case on March 27, 2018.

110. Upon information and belief, Defendant has intentionally avoided learning of the patent rights of others. For example, upon information and belief, Defendant has a policy or practice of not reviewing the patents of others, has complied with that policy or practice, and thus has been willfully blind of Ultravision's patent rights.

111. Ultravision has suffered damages as a result of Defendant's direct and indirect infringement of the '782 Patent in an amount to be proved at trial.

112. Ultravision has suffered and will continue to suffer irreparable harm as a result of Defendant's infringement of the '782 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

**COUNT VI**  
**(Infringement of the '294 Patent)**

113. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

114. Ultravision has not licensed or otherwise authorized Defendant to make, use, offer to sell, or sell within the United States or import into the United States any products that embody the inventions of the '294 Patent.

115. Defendant has directly infringed and continues to directly infringe the '294 Patent, including at least claim 22, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '294 Patent. Such products include LED displays, such as Defendant's ODSn, SEfl, and CFOsn series products.

116. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products is a modular display panel.

117. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a first side and a second side opposite to the first side, wherein the first side of the modular display panel comprises a display surface of the modular display panel.

118. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises attachment points for use in attachment as part of a multi-panel modular display.

119. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series product comprises a plastic casing comprising an outer surface of the modular display panel, the outer surface being part of the second side of the modular display panel.

120. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprise a recess disposed in the plastic casing.

121. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a printed circuit board disposed in the recess, the printed circuit board comprising a front side and an opposite back side, wherein the recess surrounds the opposite back side of the printed circuit board.

122. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a plurality of LEDs arranged as pixels attached to the front side of the printed circuit board, wherein the pixels are arranged in a rectangular array comprising at least fifty pixels.

123. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a sealing compound disposed over the front side of the printed circuit board.

124. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a framework of louvers disposed over the front side of the printed circuit board between rows of the plurality of LEDs.

125. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a circuit for controlling the plurality of LEDs, the circuit being attached to the opposite back side of the printed circuit board.

126. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a power supply for powering the plurality of LEDs, the power supply

mounted over the outer surface of the modular display panel, wherein the power supply comprises an alternating current/direct current (AC/DC) converter, and wherein the power supply is configured to receive AC power and output DC power to the plurality of LEDs.

127. Upon information and belief, the front side of the printed circuit board of each of Defendant's ODSn, SEfl, and CFOsn series products is sealed to be waterproof by the sealing compound and the plastic casing is sealed to be waterproof so that the modular display panel is sealed to be waterproof.

128. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products is configured to be exposed to an external environment without a protective waterproof enclosure.

129. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products is configured to be cooled passively without fans.

130. Defendant has indirectly infringed and continues to indirectly infringe one or more claims of the '294 Patent, including at least claim 22, by knowingly and intentionally inducing others, including customers, installers, and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that include infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products.

131. Defendant knowingly and intentionally induces infringement of one or more claims of the '294 Patent, including at least claim 22, in violation of 35 U.S.C. § 271(b), by taking active steps, directly and/or through intermediaries, to encourage others, including customers, installers, and end-users, to make, use, offer to sell, and/or sell within the United



States and/or import into the United States products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, with the specific intent to cause them to use the accused products in an infringing manner. Such steps by Defendant includes, among other things, advising or directing customers, installers, and end-users to use the accused products in an infringing manner; advertising and promoting the use of the accused products in an infringing manner; and/or providing manuals, guides, installation instructions and other documentation that guide end-users to use the accused products in an infringing manner. Defendant is performing these steps with knowledge of the '294 Patent and with knowledge that the induced acts constitute infringement, at least as of the date of the complaint filed against them in this action. Upon information and belief, Defendant is aware that the normal and customary use of the accused products by Defendant's customers would infringe the '294 Patent. Defendant's inducement is ongoing.

132. Upon information and belief, with knowledge and intent, or with willful blindness, Defendant is encouraging and facilitating infringement of one or more claims of the '294 Patent, including at least claim 22, by others. For example, upon information and belief, Defendant sells, supplies, or otherwise provides products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, to customers, installers, and end users knowing that these entities intend to make, use, offer to sell, and/or sell the products within the United States and/or import the products into the United States in an infringing manner. Defendant took active steps, directly and/or through intermediaries, with the specific intent to cause others to import, sell, or offer to sell the accused products in a manner that infringes one or more of the claims of the '294 Patent, including at least claim 22. Such steps by Defendant includes, among other things, making or selling the accused products outside of the United States

for importation into or sale in the United States, or knowing that such importation or sale would occur; and directing, facilitating, or influencing its affiliates, or third-party manufacturers, shippers, distributors, retailers, or other persons acting on its or their behalf, to import, sell, or offer to sell the accused products in an infringing manner. Defendant performed these steps with knowledge of the '294 Patent, and with knowledge that the induced acts constitute infringement, at least as of the date of the filing of this First Amended Complaint. Defendant performed such steps in order to profit from the eventual sale of the accused products in the United States. Defendant's inducement is ongoing.

133. Defendant has induced and continues to induce infringement by others of one or more claims of the '294 Patent, including at least claim 22, including customers, installers, and end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including customers, installers, and end users, infringe the '294 Patent, but while remaining willfully blind to the infringement.

134. Defendant knowingly and intentionally contributes to the direct infringement of others of one or more claims of the '294 Patent, including at least claim 22, in violation of 35 U.S.C. § 271(c), by offering to sell and/or selling within the United States and/or importing into the United States infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products and/or components thereof. Defendant's LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are components of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention. Defendant has knowledge that its LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are especially made or especially adapted

for use in an infringement of the '294 Patent, and are not staple articles or commodities of commerce suitable for substantial noninfringing use.

135. Defendant has had knowledge of the '294 Patent at least since the filing of this First Amended Complaint.

136. Upon information and belief, Defendant has intentionally avoided learning of the patent rights of others. For example, upon information and belief, Defendant has a policy or practice of not reviewing the patents of others, has complied with that policy or practice, and thus has been willfully blind of Ultravision's patent rights.

137. Ultravision has suffered damages as a result of Defendant's direct and indirect infringement of the '294 Patent in an amount to be proved at trial.

138. Ultravision has suffered and will continue to suffer irreparable harm as a result of Defendant's infringement of the '294 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

**COUNT VII**  
**(Infringement of the '603 Patent)**

139. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

140. Ultravision has not licensed or otherwise authorized Defendant to make, use, offer to sell, or sell within the United States or import into the United States any products that embody the inventions of the '603 Patent.

141. Defendant has directly infringed and continues to directly infringe the '603 Patent, including at least claim 1, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that satisfy each and

every limitation of one or more claims of the '603 Patent. Such products include LED displays, such as Defendant's ODSn, SEfl, and CFOsn series products.

142. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products is a modular display panel.

143. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a printed circuit board having a first side and an opposite second side

144. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a casing comprising a thermally conductive material, the casing being disposed at the opposite second side of the printed circuit board.

145. Upon information and belief, the casing of each of Defendant's ODSn, SEfl, and CFOsn series products contacts the opposite second side of the printed circuit board.

146. Upon information and belief, the casing each of Defendant's ODSn, SEfl, and CFOsn series products comprises sidewalls and a back surface.

147. Upon information and belief, the back surface of the casing of each of Defendant's ODSn, SEfl, and CFOsn series products comprises an outer back surface of the panel.

148. Upon information and belief, the sidewalls of the casing of each of Defendant's ODSn, SEfl, and CFOsn series products comprise plastic.

149. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a driver circuit disposed in the casing at the opposite second side of the printed circuit board, the driver circuit electrically coupled to the printed circuit board.

150. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a plurality of LEDs attached to the first side of the printed circuit board.

151. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a power supply for powering the plurality of LEDs, the printed circuit board being disposed between the power supply and the plurality of LEDs, where the power supply comprises a power converter for converting alternating current (AC) power to direct current (DC) power.

152. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a heat conducting structure disposed between the power supply and the back surface of the casing.

153. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a plurality of louvers attached to the first side of the printed circuit board.

154. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a potting material disposed at the first side of the printed circuit board.

155. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products is sealed to be waterproof.

156. Defendant has indirectly infringed and continues to indirectly infringe one or more claims of the '603 Patent, including at least claim 1, by knowingly and intentionally inducing others, including customers, installers, and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that include infringing technology, including LED displays and display board comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products.

157. Defendant knowingly and intentionally induces infringement of one or more claims of the '603 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(b), by taking

active steps, directly and/or through intermediaries, to encourage others, including customers, installers, and end-users, to make, use, offer to sell, and/or sell within the United States and/or import into the United States products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, with the specific intent to cause them to use the accused products in an infringing manner. Such steps by Defendant includes, among other things, advising or directing customers, installers, and end-users to use the accused products in an infringing manner; advertising and promoting the use of the accused products in an infringing manner; and/or providing manuals, guides, installation instructions and other documentation that guide end-users to use the accused products in an infringing manner. Defendant is performing these steps with knowledge of the '603 Patent and with knowledge that the induced acts constitute infringement, at least as of the date of the complaint filed against them in this action. Upon information and belief, Defendant is aware that the normal and customary use of the accused products by Defendant's customers would infringe the '603 Patent. Defendant's inducement is ongoing.

158. Upon information and belief, with knowledge and intent, or with willful blindness, Defendant is encouraging and facilitating infringement of one or more claims of the '603 Patent, including at least claim 1, by others. For example, upon information and belief, Defendant sells, supplies, or otherwise provides products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, to customers, installers, and end users knowing that these entities intend to make, use, offer to sell, and/or sell the products within the United States and/or import the products into the United States in an infringing manner. Defendant took active steps, directly and/or through intermediaries, with the specific intent to cause others to import, sell, or offer to sell the accused products in a manner that infringes one or more of the claims of the '603 Patent, including at least claim 1. Such steps by Defendant

includes, among other things, making or selling the accused products outside of the United States for importation into or sale in the United States, or knowing that such importation or sale would occur; and directing, facilitating, or influencing its affiliates, or third-party manufacturers, shippers, distributors, retailers, or other persons acting on its or their behalf, to import, sell, or offer to sell the accused products in an infringing manner. Defendant performed these steps with knowledge of the '603 Patent, and with knowledge that the induced acts constitute infringement, at least as of the filing date of this First Amended Complaint. Defendant performed such steps in order to profit from the eventual sale of the accused products in the United States. Defendant's inducement is ongoing.

159. Defendant has induced and continues to induce infringement by others of one or more claims of the '603 Patent, including at least claim 1, including customers, installers, and end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including customers, installers, and end users, infringe the '603 Patent, but while remaining willfully blind to the infringement.

160. Defendant knowingly and intentionally contributes to the direct infringement of others of one or more claims of the '603 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(c), by offering to sell and/or selling within the United States and/or importing into the United States infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products and/or components thereof. Defendant's LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are components of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention. Defendant has knowledge that its LED displays, including

Defendant's ODSn, SEfl, and CFOsn series products, are especially made or especially adapted for use in an infringement of the '603 Patent, and are not staple articles or commodities of commerce suitable for substantial noninfringing use.

161. Defendant has had knowledge of the '603 Patent at least since the filing of this First Amended Complaint.

162. Upon information and belief, Defendant has intentionally avoided learning of the patent rights of others. For example, upon information and belief, Defendant has a policy or practice of not reviewing the patents of others, has complied with that policy or practice, and thus has been willfully blind of Ultravision's patent rights.

163. Ultravision has suffered damages as a result of Defendant's direct and indirect infringement of the '603 Patent in an amount to be proved at trial.

164. Ultravision has suffered and will continue to suffer irreparable harm as a result of Defendant's infringement of the '603 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

**COUNT VIII**  
**(Infringement of the '869 Patent)**

165. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

166. Ultravision has not licensed or otherwise authorized Defendant to make, use, offer to sell, or sell within the United States or import into the United States any products that embody the inventions of the '869 Patent.

167. Defendant has directly infringed and continues to directly infringe the '869 Patent, including at least claim 19, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that satisfy each and



every limitation of one or more claims of the '869 Patent. Such products include LED displays, such as Defendant's ODSn, SEfl, and CFOsn series products.

168. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products is a modular display panel.

169. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a plastic casing comprising a first side and an opposite second side.

170. Upon information and belief, the first side of the plastic casing of each of Defendant's ODSn, SEfl, and CFOsn series products includes a surface that is part of an outer surface of the modular display panel.

171. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprises a printed circuit board attached to the plastic casing.

172. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprise a plurality of LEDs attached to a first side of the printed circuit board.

173. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products comprise a potting compound overlying the first side of the printed circuit board.

174. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series products a circuit for controlling the plurality of the LEDs attached to a second side of the printed circuit board, the second side being opposite to the first side, wherein the circuit is disposed within the plastic casing.

175. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series product comprises a power supply mounted outside the plastic casing, the power supply comprising a power converter for converting ac power to dc power.

176. Upon information and belief, each of Defendant's ODSn, SEfl, and CFOsn series product comprises a thermally conductive material to extract heat disposed proximate to the power supply, wherein the modular display panel is sealed to be waterproof.

177. Defendant has indirectly infringed and continues to indirectly infringe one or more claims of the '869 Patent, including at least claim 19, by knowingly and intentionally inducing others, including customers, installers, and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that include infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products.

178. Defendant knowingly and intentionally induces infringement of one or more claims of the '869 Patent, including at least claim 19, in violation of 35 U.S.C. § 271(b), by taking active steps, directly and/or through intermediaries, to encourage others, including customers, installers, and end-users, to make, use, offer to sell, and/or sell within the United States and/or import into the United States products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series products, with the specific intent to cause them to use the accused products in an infringing manner. Such steps by Defendant includes, among other things, advising or directing customers, installers, and end-users to use the accused products in an infringing manner; advertising and promoting the use of the accused products in an infringing manner; and/or providing manuals, guides, installation instructions and other documentation that guide end-users to use the accused products in an infringing manner. Defendant is performing these steps with knowledge of the '869 Patent and with knowledge that the induced acts constitute infringement, at least as of the date of the complaint filed against them in this action.

Upon information and belief, Defendant is aware that the normal and customary use of the accused products by Defendant's customers would infringe the '869 Patent. Defendant's inducement is ongoing.

179. Upon information and belief, with knowledge and intent, or with willful blindness, Defendant is encouraging and facilitating infringement of one or more claims of the '869 Patent, including at least claim 19, by others. For example, upon information and belief, Defendant sells, supplies, or otherwise provides products, including but not limited to Defendant's ODSn, SEfl, and CFOsn series product, to customers, installers, and end users knowing that these entities intend to make, use, offer to sell, and/or sell the products within the United States and/or import the products into the United States in an infringing manner. Defendant took active steps, directly and/or through intermediaries, with the specific intent to cause others to import, sell, or offer to sell the accused products in a manner that infringes one or more of the claims of the '869 Patent, including at least claim 19. Such steps by Defendant includes, among other things, making or selling the accused products outside of the United States for importation into or sale in the United States, or knowing that such importation or sale would occur; and directing, facilitating, or influencing its affiliates, or third-party manufacturers, shippers, distributors, retailers, or other persons acting on its or their behalf, to import, sell, or offer to sell the accused products in an infringing manner. Defendant performed these steps with knowledge of the '869 Patent, and with knowledge that the induced acts constitute infringement, at least as of the date of the filing of this First Amended Complaint. Defendant performed such steps in order to profit from the eventual sale of the accused products in the United States. Defendant's inducement is ongoing.

180. Defendant has induced and continues to induce infringement by others of one or more claims of the '869 Patent, including at least claim 19, including customers, installers, and end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including customers, installers, and end users, infringe the '869 Patent, but while remaining willfully blind to the infringement.

181. Defendant knowingly and intentionally contributes to the direct infringement of others of one or more claims of the '869 Patent, including at least claim 19, in violation of 35 U.S.C. § 271(c), by offering to sell and/or selling within the United States and/or importing into the United States infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's ODSn, SEfl, and CFOsn series products and/or components thereof. Defendant's LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are components of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention. Defendant has knowledge that its LED displays, including Defendant's ODSn, SEfl, and CFOsn series products, are especially made or especially adapted for use in an infringement of the '869 Patent, and are not staple articles or commodities of commerce suitable for substantial noninfringing use.

182. Defendant has had knowledge of the '869 Patent at least since the filing of this First Amended Complaint.

183. Upon information and belief, Defendant has intentionally avoided learning of the patent rights of others. For example, upon information and belief, Defendant has a policy or practice of not reviewing the patents of others, has complied with that policy or practice, and thus has been willfully blind of Ultravision's patent rights.

184. Ultravision has suffered damages as a result of Defendant's direct and indirect infringement of the '869 Patent in an amount to be proved at trial.

185. Ultravision has suffered and will continue to suffer irreparable harm as a result of Defendant's infringement of the '869 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

**COUNT IX**  
**(Infringement of the '372 Patent)**

186. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

187. Ultravision has not licensed or otherwise authorized Defendant to make, use, offer to sell, or sell within the United States or import into the United States any products that embody the inventions of the '372 Patent.

188. Defendant has directly infringed and continues to directly infringe the '372 Patent, including at least claim 1, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '372 Patent. Such products include LED displays, such as Defendant's CFOsn and MOsn series products.

189. Upon information and belief, each of Defendant's CFOsn and MOsn series products is a modular display panel.

190. Upon information and belief, each of Defendant's CFOsn and MOsn series products comprise a casing having a recess and attachment points for use in attachment as part of a multi-panel modular display, a perimeter of the casing being substantially rectangular and having a height and a width, wherein the height is half of the width.

191. Upon information and belief, the casing of each of Defendant's CFOsn and MOsn series products comprises a printed circuit board disposed in the recess.

192. Upon information and belief, each of Defendant's CFOsn and MOsn series products comprises a display surface comprising an array of LEDs attached to a front side of the printed circuit board.

193. Each of the LEDs of the LED array of Defendant's CFOsn and MOsn series products is spaced from each respective adjacent LED of the LED array by a pitch.

194. Upon information and belief, the pitch of each of Defendant's CFOsn and MOsn series products is a predetermined constant number.

195. Upon information and belief, the pitch of each of Defendant's CFOsn and MOsn series products does not depend on the height and width.

196. Upon information and belief, each of Defendant's CFOsn and MOsn series products comprise a driver circuit electrically coupled to the printed circuit board.

197. Defendant has indirectly infringed and continues to indirectly infringe one or more claims of the '372 Patent, including at least claim 1, by knowingly and intentionally inducing others, including customers, installers, and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling within the United States and/or importing into the United States products that include infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's CFOsn, and MOsn series products.

198. Defendant knowingly and intentionally induces infringement of one or more claims of the '372 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(b), by taking active steps, directly and/or through intermediaries, to encourage others, including customers,

installers, and end-users, to make, use, offer to sell, and/or sell within the United States and/or import into the United States products, including but not limited to Defendant's CFOsn and MOsn series products with the specific intent to cause them to use the accused products in an infringing manner. Such steps by Defendant includes, among other things, advising or directing customers, installers, and end-users to use the accused products in an infringing manner; advertising and promoting the use of the accused products in an infringing manner; and/or providing manuals, guides, installation instructions and other documentation that guide end-users to use the accused products in an infringing manner. Defendant is performing these steps with knowledge of the '372 Patent and with knowledge that the induced acts constitute infringement, at least as of the date of the complaint filed against them in this action. Upon information and belief, Defendant is aware that the normal and customary use of the accused products by Defendant's customers would infringe the '372 Patent. Defendant's inducement is ongoing.

199. Upon information and belief, with knowledge and intent, or with willful blindness, Defendant is encouraging and facilitating infringement of one or more claims of the '372 Patent, including at least claim 1, by others. For example, upon information and belief, Defendant sells, supplies, or otherwise provides products, including but not limited to Defendant's CFOsn and MOsn series products, to customers, installers, and end users knowing that these entities intend to make, use, offer to sell, and/or sell the products within the United States and/or import the products into the United States in an infringing manner. Defendant took active steps, directly and/or through intermediaries, with the specific intent to cause others to import, sell, or offer to sell the accused products in a manner that infringes one or more of the claims of the '372 Patent, including at least claim 1. Such steps by Defendant includes, among other things, making or selling the accused products outside of the United States for importation

into or sale in the United States, or knowing that such importation or sale would occur; and directing, facilitating, or influencing its affiliates, or third-party manufacturers, shippers, distributors, retailers, or other persons acting on its or their behalf, to import, sell, or offer to sell the accused products in an infringing manner. Defendant performed these steps with knowledge of the '372 Patent, and with knowledge that the induced acts constitute infringement, at least as of the date of the filing of this First Amended Complaint. Defendant performed such steps in order to profit from the eventual sale of the accused products in the United States. Defendant's inducement is ongoing.

200. Defendant has induced and continues to induce infringement by others of one or more claims of the '372 Patent, including at least claim 1, including customers, installers, and end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including customers, installers, and end users, infringe the '372 Patent, but while remaining willfully blind to the infringement.

201. Defendant knowingly and intentionally contributes to the direct infringement of others of one or more claims of the '372 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(c), by offering to sell and/or selling within the United States and/or importing into the United States infringing technology, including LED displays and display boards comprising multiple LED displays, including Defendant's CFOsn and MOsn series products and/or components thereof. Defendant's LED displays, including Defendant's CFOsn and MOsn series products, are components of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention. Defendant has knowledge that its LED displays, including Defendant's CFOsn and MOsn series products, are especially made or especially adapted for use in an infringement of the



'372 Patent, and are not staple articles or commodities of commerce suitable for substantial noninfringing use.

202. Defendant has had knowledge of the '372 Patent at least since the filing of this First Amended Complaint.

203. Upon information and belief, Defendant has intentionally avoided learning of the patent rights of others. For example, upon information and belief, Defendant has a policy or practice of not reviewing the patents of others, has complied with that policy or practice, and thus has been willfully blind of Ultravision's patent rights.

204. Ultravision has suffered damages as a result of Defendant's direct and indirect infringement of the '372 Patent in an amount to be proved at trial.

205. Ultravision has suffered and will continue to suffer irreparable harm as a result of Defendant's infringement of the '372 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

**DEMAND FOR JURY TRIAL**

Ultravision hereby demands a jury for all issues so triable.

**PRAYER FOR RELIEF**

WHEREFORE, Ultravision prays for relief against Defendant as follows:

- a. entry of judgment declaring that Defendant has directly and/or indirectly infringed one or more claims of each of the Patents-in-Suit;
- b. an order pursuant to 35 U.S.C. § 283 permanently enjoining Defendant, its officers, agents, servants, employees, attorneys, instrumentalities and those persons in privity, active concert, or participation with it, from further acts of direct and/or indirect infringement of the Patents-in-Suit including the manufacture, sale, offer for sale, importation and use of the infringing products;

c. a full accounting for and an award of damages to Ultravision for Defendant's infringement of the Patents-in-Suit, but in no event less than a reasonable royalty, including enhanced damages pursuant to 35 U.S.C. § 284, together with pre- and post-judgment interest;

d. entry of judgment declaring that this case is exceptional and awarding Ultravision its costs and reasonable attorney fees under 35 U.S.C. § 285; and

e. such other and further relief as the Court deems just and proper.

Dated: May 27, 2020

Respectfully submitted,

*/s/ Alfred R. Fabricant*

Alfred R. Fabricant

NY Bar No. 2219392

Email: afabricant@brownrudnick.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@brownrudnick.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@brownrudnick.com

Joseph M. Mercadante

NY Bar No. 4784930

Email: jmercadante@brownrudnick.com

Timothy J. Rousseau

NY Bar No. 4698742

Email: trousseau@brownrudnick.com

**BROWN RUDNICK LLP**

7 Times Square

New York, New York 10036

Telephone: (212) 209-4800

Facsimile: (212) 2019-4801

Samuel F. Baxter

Texas Bar No. 01938000

Email: sbaxter@mckoolsmith.com

Jennifer L. Truelove

Texas Bar No. 24012906

Email: jtruelove@mckoolsmith.com

**McKOOL SMITH, P.C.**

104 East Houston Street, Suite 300

Marshall, Texas 75670

Telephone: (903) 923-9000

Facsimile: (903) 923-9099

***ATTORNEYS FOR PLAINTIFF  
ULTRAVISION TECHNOLOGIES, LLC***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on May 27, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

*/s/ Alfred R. Fabricant* \_\_\_\_\_

Alfred R. Fabricant