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7 Attorneys for Plaintiff  
SEMICONDUCTOR ENERGY  
8 LABORATORY CO., LTD.

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

SEMICONDUCTOR ENERGY  
LABORATORY CO., LTD.,

Plaintiff,

v.

TCL CHINA STAR  
OPTOELECTRONICS TECHNOLOGY  
CO., LTD.; WUHAN CHINA STAR  
OPTOELECTRONICS  
SEMICONDUCTOR DISPLAY  
TECHNOLOGY CO., LTD.; TCL  
TECHNOLOGY GROUP  
CORPORATION; TTE TECHNOLOGY,  
INC.; TCL COMMUNICATION  
TECHNOLOGY HOLDINGS LIMITED;  
TCT MOBILE, INC.; TCT MOBILE (US)  
INC.; HUIZHOU TCL MOBILE  
COMMUNICATION CO. LTD.; and TCL  
COMMUNICATION LIMITED

Defendants.

Case No. 8:21-cv-00554-JAK-KES

**FIRST AMENDED COMPLAINT  
FOR PATENT INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

1                   **FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

2                   Plaintiff Semiconductor Energy Laboratory Co., Ltd. (“SEL”), files this  
3 Complaint and demand for a jury trial seeking relief for patent infringement by TCL  
4 China Star Optoelectronics Technology Co., Ltd.; Wuhan China Star  
5 Optoelectronics Semiconductor Display Technology Co., Ltd.; TCL Technology  
6 Group Corporation; TTE Technology, Inc.; TCL Communication Technology  
7 Holdings Limited; TCT Mobile Inc.; TCT Mobile (US) Inc.; Huizhou TCL Mobile  
8 Communication Co. Ltd.; and TCL Communication Limited<sup>1</sup> of United States Patent  
9 Nos. 7,372,199 (“the ’199 patent”), 9,208,717 (“the ’717 patent”), 10,680,049 (“the  
10 ’049 patent”), and 10,777,290 (“the ’290 patent”) (collectively, “the Asserted  
11 Patents”). SEL states and alleges the following:

12   **NATURE OF ACTION**

13                   1.       This is an action for patent infringement arising under the patent laws  
14 of the United States, 35 U.S.C. § 1 *et seq.*, specifically including 35 U.S.C. § 271.

15   **THE PARTIES**

16                   2.       SEL is a Japan-based research and development company, and has a  
17 regular and established place of business at 398 Hase, Atsugi-shi, Kanagawa, 243-  
18 0036, Japan.

19                   3.       Upon information and belief, TCL China Star Optoelectronics  
20 Technology Co., Ltd. (“TCL CSOT”) is a China-based display company, and has a  
21 regular and established place of business at No. 9-2 TangMing Ave., GuangMing  
22 New District, ShenZhen, Guangdong, 518132, China. TCL China Star  
23 Optoelectronics Technology Co., Ltd. is a majority shareholder of a China-based  
24 display company, Wuhan China Star Optoelectronics Semiconductor Display  
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26 <sup>1</sup> Unless specified otherwise, “TCL” as used herein refers to TCL Technology Group  
27 Corporation; TTE Technology, Inc.; TCL Communication Technology Holdings  
28 Limited; TCT Mobile Inc.; TCT Mobile (US) Inc., Huizhou TCL Mobile  
Communication Co. Ltd.; and TCL Communication Limited.

1 Technology Co., Ltd. (“Wuhan CSOT Display”) (hereinafter, both entities are  
2 collectively, “CSOT”), which has a regular and established place of business at  
3 Room 305, Building C5, Optics Valley Biological Innovation Park, No.666, Gaoxin  
4 Ave., Donghu New Technology Development Zone Wuhan, Hubei, 430077 China.  
5 References herein to “CSOT” without a further modifier are intended to include  
6 both TCL CSOT and Wuhan CSOT Display.

7 4. Upon information and belief, TCL Technology Group Corporation is a  
8 China-based global electronics company, and has a regular and established place of  
9 business at No. 17, Huifeng Third Road, Zhongkai High-tech Zone, Huizhou,  
10 Guangdong, 516001, China. TCL Technology Group Corporation is the ultimate  
11 parent of CSOT, TTE Technology, Inc., TCL Communication Technology Holdings  
12 Limited, TCT Mobile Inc., TCT Mobile (US) Inc., Huizhou TCL Mobile  
13 Communication Co. Ltd., and TCL Communication Limited.

14 5. Upon information and belief, TTE Technology, Inc. is a corporation  
15 organized and existing under the laws of Delaware with its principal place of  
16 business at 1860 Compton Ave., Corona, California, 92881.

17 6. Upon information and belief, TCL Communication Technology  
18 Holdings Limited is incorporated in the Cayman Islands, is a global mobile and  
19 internet products company, a subsidiary of TCL Technology Group Corporation,  
20 and has a regular and established place of business at Block F4, TCL  
21 Communication Technology Building, TCL International E City, Zhong Shan Yuan  
22 Road, Nanshan District, Shenzhen, Guangdong, China. Huizhou TCL Mobile  
23 Communication Co. Ltd. is a company that has a regular and established principal  
24 place of business at No. 86 Hechang Qi Lu Xi, Zhongkai Gaoxin District, Huizhou  
25 City, Guangdong Province, P.R. China. TCL Communication Limited is a company  
26 that has a regular and established place of business at 7/F, Block F4, TCL  
27  
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1 International E City Zhong Shan Yuan Road, Nanshan District, Shenzhen, P.R.  
2 China.

3 7. Upon information and belief, TCT Mobile Inc. is a corporation  
4 organized and existing under the laws of Delaware with its principal place of  
5 business at 25 Edelman, Suite 200, Irvine, California 92618. TCT Mobile Inc. is a  
6 subsidiary of TCL Communication Technology Holdings Limited.

7 8. Upon information and belief, TCT Mobile (US) Inc. is a corporation  
8 organized and existing under the laws of Delaware with its principal place of  
9 business at 25 Edelman, Suite 200, Irvine, California 92618. TCT Mobile (US) Inc.  
10 is a subsidiary of TCL Communication Technology Holdings Limited.

11 **JURISDICTION AND VENUE**

12 9. This action arises under the patent laws of the United States, Title 35  
13 U.S.C. § 1, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C.  
14 §§ 1331 and 1338(a).

15 10. This Court has personal jurisdiction over Defendants because  
16 Defendants are located in the Central District of California and/or have purposely  
17 availed themselves of the privilege of conducting activities within this state and  
18 judicial district. On information and belief, each of the Defendants, directly or  
19 indirectly through intermediaries (including distributors, retailers, and others), ships,  
20 distributes, offers for sale, sells, and advertises products in the United States, the  
21 State of California, and the Central District of California. Each Defendant has  
22 purposefully and voluntarily sold one or more of its infringing products with the  
23 expectation that they will be purchased by consumers in the Central District of  
24 California. On information and belief, these infringing products have been and  
25 continue to be purchased by consumers in the Central District of California. The  
26 Defendants have committed acts of patent infringement within the United States  
27 and, more particularly, within the Central District of California.

1           11. In addition, this Court has personal jurisdiction over TCT Mobile Inc.  
2 and TCT Mobile (US) Inc. (collectively “TCT Mobile”), which are subsidiaries of  
3 TCL Communication Technology Holdings Limited. TCT Mobile and TTE  
4 Technology, Inc. maintain continuous and systematic contacts with California and  
5 with this District, including maintaining and staffing a corporate office within this  
6 District in Irvine, California and Corona, California. On information and belief,  
7 TCL Communication Technology Holdings Limited’s U.S. headquarters, and that of  
8 TCT Mobile is located at their Irvine office. *See, e.g.*, <https://tclcom.com/us/> (“TCL  
9 Communication Technology Holdings Limited (TCT) with its North America  
10 headquarters based in Irvine, California, is a wholly owned company of TCL  
11 Corporation, a global consumer electronics brand with products currently sold in  
12 over 160 countries. With a mobile handset product portfolio that includes devices  
13 from TCL, Alcatel and BlackBerry, TCT is currently the fourth largest handset  
14 manufacturer in North America. The company also operates nine R&D centers  
15 worldwide and employs over 13,500 people globally.”); <http://www.tctusa.com/>  
16 (similar statement as above).

17           12. On information and belief, TTE Technology, Inc., TCL  
18 Communication Technology Holdings Limited, TCT Mobile, and TCL  
19 Communication Limited on behalf of TCL Technology Group Corporation,  
20 participates in the promotion and marketing of mobile devices to U.S. customers,  
21 and facilitates TCL Technology Group Corporation’s U.S. activities. TCL  
22 Technology Group Corporation controls its subsidiaries, including the other  
23 Defendants in this case, as well as many other subsidiaries. TTE Technology, Inc.,  
24 TCT Mobile, and TCL Communication Limited give TCL Technology Group  
25 Corporation and TCL Communication Technology Holdings Limited business  
26 advantages that they would have enjoyed if they conducted their business through  
27 their own offices or paid agents in the state.

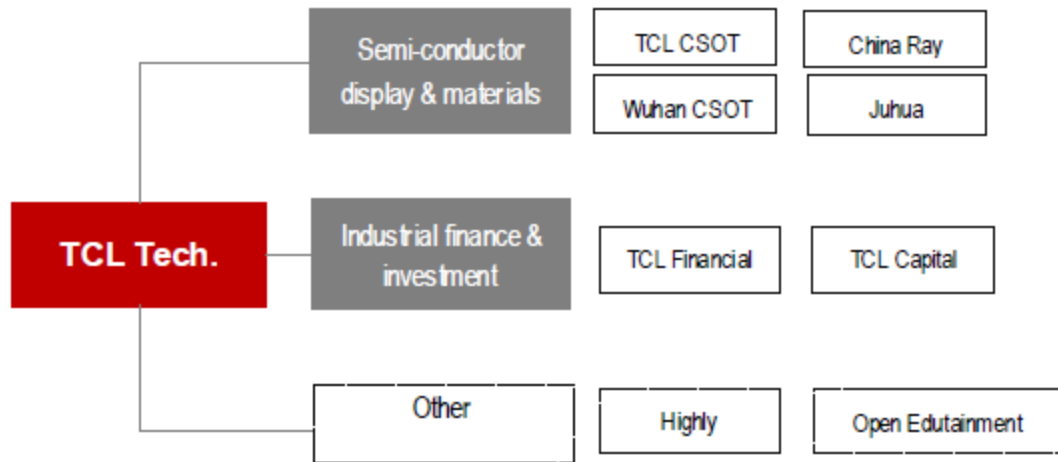
1           13. On information and belief, CSOT, TTE Technology, Inc., TCL  
2 Communication Technology Holdings Limited, TCT Mobile Inc., TCT Mobile (US)  
3 Inc., Huizhou TCL Mobile Communication Co. Ltd., and TCL Communication  
4 Limited are alter egos of TCL Technology Group Corporation. As a result of these  
5 relationships, CSOT, TCL Technology Group Corporation, and TCL  
6 Communication Technology Holdings Limited are subject to personal jurisdiction in  
7 this judicial district based at least on their alter-ego status.

8           14. For example, TCL Technology Group Corporation publicly represents  
9 that TCL CSOT is a subsidiary of TCL Technology Group Corporation at least as of  
10 2008. *See, e.g.*, <https://www.tcl.com/ge/en/aboutTCL/the-group.html> (“TCL  
11 completed the infrastructure of 8.5th gen LCD panel for its subsidiary [TCL]  
12 CSOT.”) Further, TCL Technology Group Corporation publicly represents that  
13 “TCL-owned Shenzhen China Star Optoelectronics Technology Co., Ltd ([TCL]  
14 CSOT)” is TCL Technology Group Corporation’s panel manufacturer. (*See*  
15 <https://www.tcl.com/ge/en/news/csot-news.html>; *see also*  
16 <https://www.tcl.com/ge/en/blogs/tcl-launch-ai-smart-tv-ifa-2017.html> (“TCL-owned  
17 Shenzhen China Star Optoelectronics Technology Co., Ltd ([TCL] CSOT)  
18 continually expanded its share in the TV panel market.”).

19           15. TCL Technology Group Corporation files a consolidated annual report  
20 that includes at least some of the TCL Technology Group Corporation companies,  
21 including [TCL] CSOT, TCL Communication Technology Holdings Limited, and  
22 TCT Mobile (US) Inc. (*See* [TCL 集团股份有限公司 2019 年年度报告](#)  
23  [\(cs.com.cn\)](http://cs.com.cn); [TCL 科技集团股份有限公司 2019 年年度报告摘要](#)  [\(dfcfw.com\)](http://dfcfw.com);  
24 <https://q.stock.sohu.com/newpdf/201935609389.pdf>).

25           16. On information and belief, TCL CSOT and Wuhan CSOT Display are  
26 part of the organizational structure of TCL Technology Group Corporation (as of  
27 March 31, 2020), which is publicly represented in TCL Technology Group  
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1 Corporation’s Annual Report 2019 (see [TCL 集团股份有限公司 2019 年年度报告](http://www.tcl.com.cn)  
 2 [cs.com.cn](http://www.tcl.com.cn)) at pp. 17, 26):



12 17. According to the diagram above, and thus based on information and  
 13 belief, TCL CSOT is part of TCL Technology Group Corporation’s “semi-  
 14 conductor display & materials” business segment. (See *id.*) TCL Technology  
 15 Group Corporation further states that it “will further concentrate its resources to  
 16 increase scale and market competitiveness of semi-conductor display and material  
 17 business based on TCL CSOT as the core, so as to strengthen and deepen the semi-  
 18 conductor display and material industrial chain.” (See *id.* at pp. 47-48.)

19 18. On information and belief, Mr. LI Dongsheng is “currently the  
 20 chairman and chief executive offices of TCL Technology Group Corporation” and is  
 21 also “the chairman and the legal representative of [TCL] CSOT.”

22 <http://electronics.tcl.com/en/cg/lidongsheng.php>.

23 19. This Court also has personal jurisdiction over Defendants because they  
 24 have committed acts within California giving rise to this action and/or have  
 25 established minimum contacts with California such that personal jurisdiction over  
 26 Defendants would not offend traditional notions of fair play and substantial justice.  
 27 The Defendants are also subject to this Court’s jurisdiction pursuant to due process  
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1 and/or the California Long Arm Statute, due at least to their substantial business  
2 conducted in this forum, directly and/or indirectly through agents and  
3 intermediaries, including (i) having solicited business in the State of California and  
4 in this District, transacted business within the State of California and in this District,  
5 and attempted to derive financial benefit from residents of the State of California  
6 and this District; (ii) having placed their products and services into the stream of  
7 commerce throughout the United States and having been actively engaged in  
8 transacting business in California and in this District; (iii) either alone or in  
9 conjunction with others, having committed acts of infringement within California  
10 and in this District. On information and belief, the Defendants, directly and/or  
11 indirectly through intermediaries, have advertised (including through websites and  
12 TCT Mobile's and TCL Communication Limited's activities, among other  
13 subsidiaries), offered to sell, sold, and/or distributed infringing products, and/or  
14 have actively induced the sale and use of infringing products within California and  
15 within this District, as well as imported into the United States; and (iv) through their  
16 presence and physical location in Irvine, California. The Defendants have, directly  
17 or indirectly, through their distribution network, purposefully and voluntarily placed  
18 such products in the stream of commerce knowing and expecting them to be  
19 purchased and used by consumers in California and in this District. The Defendants  
20 have committed direct infringement in California or committed indirect  
21 infringement based on acts of direct infringement in California and from  
22 Defendants' location in Irvine, California, among other locations.

23       20. As a further example, CSOT has placed and continues to place  
24 infringing cell phone displays into the stream of commerce via an established  
25 distribution channel with the knowledge and/or intent that those products were sold  
26 and continue to be sold in the United States and California, including in this District.  
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1 CSOT supplies infringing displays to customers who target the U.S. market and  
2 California, including TCL and Motorola Mobility LLC (“Motorola”).

3 21. TCL incorporates CSOT displays into its infringing TCL 10 Pro  
4 smartphone that is marketed and sold to customers located in California and within  
5 this District. TCL markets its phones directly to customers through its website (*see*  
6 <https://www.tcl.com/us/en/products/mobile/tcl-10-pro>), and offers to sell and sells  
7 its phones through numerous physical third-party store locations within California  
8 and this District (*see, e.g.*, [https://www.tcl.com/us/en/products/mobile/tcl-10-](https://www.tcl.com/us/en/products/mobile/tcl-10-pro/t799b)  
9 [pro/t799b](https://www.tcl.com/us/en/products/mobile/tcl-10-pro/t799b)). For example, TCL’s website has a “Where to Buy” tool for the TCL 10  
10 Pro, with a “Find Nearby” option showing major third-party retailers like Target,  
11 Walmart, and Best Buy in or near Irvine, among other locations in this District. *See*  
12 *id.* Additionally, the TCL 10 Pro is designed to comply with United States Federal  
13 Communications Commission (FCC) regulations, as required for sale and  
14 importation in the United States. (*See, e.g.*,  
15 [https://static.helpjuice.com/helpjuice\\_production/uploads/upload/image/2771/direct/](https://static.helpjuice.com/helpjuice_production/uploads/upload/image/2771/direct/1588826968150-T1%2010%20Pro%20T799B%20English%20UM%2020200304%20draft1%5B1%5D.pdf)  
16 [1588826968150-T1 10 Pro T799B English UM 20200304 draft1%5B1%5D.pdf](https://static.helpjuice.com/helpjuice_production/uploads/upload/image/2771/direct/1588826968150-T1%2010%20Pro%20T799B%20English%20UM%2020200304%20draft1%5B1%5D.pdf)).

17 22. CSOT displays are also incorporated into Motorola’s infringing razr 5G  
18 smartphone that is marketed and sold to customers located in California and within  
19 this District. The razr 5G is offered for sale and sold directly to customers through  
20 the Motorola website (*see* <https://www.motorola.com/us/smartphones-razr-gen-2/p>),  
21 through the website of its carrier partner Verizon (*see*  
22 <https://www.verizon.com/smartphones/moto-razr/>), and through numerous physical  
23 Verizon Wireless store locations within California and this District (*see*  
24 <https://www.verizonwireless.com/stores/california/#/state>). In addition, service and  
25 warranty repair for the razr 5G is provided within California and this District,  
26 including Authorized Motorola Repair Centers (*see, e.g.*, [https://motorola-global-](https://motorola-global-portal.custhelp.com/app/mcp/track-repair/service-center-locator/type/inw)  
27 [portal.custhelp.com/app/mcp/track-repair/service-center-locator/type/inw](https://motorola-global-portal.custhelp.com/app/mcp/track-repair/service-center-locator/type/inw)) (showing  
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1 Authorized Motorola Repair Center in Orange, California)). On information and  
2 belief, certain customer support and service may also be available at local physical  
3 Verizon stores within California and this District. Additionally, the razr 5G is  
4 designed to comply with United States Federal Communications Commission (FCC)  
5 regulations, as required for sale and importation in the United States. (*See, e.g.*,  
6 <https://fccid.io/IHDT56XL1>; <https://fcc.report/FCC-ID/IHDT56XL1>).

7 23. On information and belief, CSOT induces TCL and Motorola to include  
8 its infringing displays into phones sold by TCL and Motorola with the knowledge  
9 that these phones will be sold in the U.S. and California. As a result, CSOT has  
10 placed and continues to place infringing cell phone displays into the stream of  
11 commerce knowing that many of its products will end up in California.

12 24. Thus, on information and belief, Defendants' presence and activities in  
13 this District, including patent infringement as described below, give rise to the  
14 claims set forth herein.

15 25. This Court has jurisdiction over this action against the Defendants  
16 because the subject matter of the action satisfies the requirements of 35 U.S.C. §  
17 299(a) in that (1) it arises, at least in part, out of the same transaction, occurrence, or  
18 series of transactions or occurrences relating to the making, using, importing into the  
19 United States, offering for sale, and/or selling of the same products accused of  
20 infringing the patents asserted in this action, and (2) questions of fact common to the  
21 Defendants will arise in the action.

22 26. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b),  
23 1391(c) and 1400 because the Defendants do business here and are subject to  
24 personal jurisdiction in this judicial District. Venue is also proper because  
25 Defendants' presence and activities in this District give rise to the claims set forth  
26 herein. On information and belief, TCT Mobile's office in Irvine is its headquarters  
27 and the North America headquarters of TCL Communication Technology Holdings  
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1 Limited. TCT Mobile and TCL Communication Technology Holdings Limited, on  
2 behalf of TCL and CSOT, conduct activities within this District related to the  
3 promotion and marketing of CSOT displays and/or phones containing such displays  
4 to U.S. customers. On information and belief, TCT Mobile and TCL  
5 Communication Technology Holdings Limited facilitate TCL and CSOT's U.S.  
6 activities from this District. In addition, venue is proper for all defendants other  
7 than TCT Mobile and TTE Technology, Inc. because they are not residents of the  
8 U.S., so they may be sued in any judicial district. Therefore, venue is proper in this  
9 Court.

10 **FACTUAL BACKGROUND**

11 **SEL'S Patented Technology**

12 27. The Asserted Patents relate to a number of semiconductor technologies  
13 used in the design and manufacturing of semiconductor displays, including OLED  
14 displays, used in various consumer products.

15 28. The '199 patent relates to technology for constructing a light emitting  
16 device that is capable of equalizing and raising the luminance of different colors of  
17 the emitted light. The patented device uses a combination of a triplet organic  
18 compound that emits light via phosphorescence and a singlet organic compound that  
19 emits light via fluorescence in conjunction with multiple hole transporting layers. In  
20 this way, the patented invention makes it possible to control and equalize the  
21 luminance of light emitted, as well as reduce the power consumption and prevent  
22 lopsided degradation of the electroluminescent elements.

23 29. The '717 patent generally relates to a circuit configuration of a display  
24 device. The patented circuit includes a particular arrangement and interconnection  
25 of circuit components. The inventions of the '717 patent realize many benefits,  
26 including implementing error correction using a threshold value of a driver  
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1 transistor of a circuit, such as a pixel circuit, itself and therefore correctly  
2 performing threshold value correction.

3 30. The '049 patent relates to an OLED device with an improved thin film  
4 transistor channel design that provides several benefits over preexisting designs.  
5 The inventions of the '049 patent provide many benefits, including decreased  
6 dispersion, more uniform brightness, and constant brightness despite OLED  
7 deterioration.

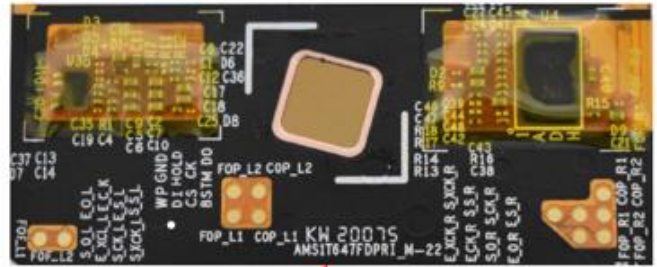
8 31. The '290 patent generally relates to a circuit configuration of a  
9 semiconductor device that includes a gate driver and/or a pixel circuit. The patented  
10 circuit includes a particular arrangement and interconnection of circuit components.  
11 The inventions of the '290 patent realize many benefits, such as providing a circuit  
12 for sequentially outputting low or high level signals, reducing the circuit scale,  
13 and/or reducing power consumption.

14 **Defendants' Use of SEL's Innovations**

15 32. CSOT's infringing display panels are a primary component in the TCL  
16 10 Pro and razr 5G smart phones sold by TCL and Motorola respectively.<sup>2</sup> Upon  
17 information and belief, CSOT sells its displays, including OLED displays, to TCL  
18 and Motorola, who install the displays into their TCL 10 Pro and razr 5G phones,  
19 then import them into the U.S. for marketing and sale to U.S. customers. *See*  
20 [https://www.gsmarena.com/tcl\\_unveils\\_selfbranded\\_quadcamera\\_10series\\_smartph](https://www.gsmarena.com/tcl_unveils_selfbranded_quadcamera_10series_smartph)  
21 [ones\\_starting\\_at\\_under\\_500-news-40889.php](https://www.gsmarena.com/tcl_unveils_selfbranded_quadcamera_10series_smartphones_starting_at_under_500-news-40889.php);  
22 <https://www.gizchina.com/2020/01/07/tcl-10-series-ces2020/>;  
23 <https://www.devicespecifications.com/en/news/46841059>; [https://www.oled-](https://www.oled-a.org/motorola-replaced-auo-with-boe--csot-as-folded-oled-source-for-new-)  
24 [a.org/motorola-replaced-auo-with-boe--csot-as-folded-oled-source-for-new-](https://www.oled-a.org/motorola-replaced-auo-with-boe--csot-as-folded-oled-source-for-new-)  
25

26 \_\_\_\_\_  
27 <sup>2</sup> CSOT's infringing displays, including but not limited to those supplied for the  
28 TCL 10 Pro and Motorola razr 5G, along with the phones themselves, are collectively referred to herein as the "Accused Products."

1 [razr\\_121519.html](#). On information and belief, the serial numbers on displays found  
2 in the Accused Products indicate CSOT is the source of the displays:



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AMS1T647FDPRI\_M-22

13 (TCL 10 Pro)



1  
2 **AMD20062FDFRIM-71**

3 (Motorola razr 5G)

4 33. Display technology that improves quality, performance, or cost in a  
5 smart phone is critical for both consumers of smart phones and companies who  
6 develop and market them. On information and belief, display capability and  
7 performance has been a driver of sales for the smart phone industry generally for  
8 many years.

9 34. For example, TCL’s advertising and marketing of its displays are a key  
10 part of its sales strategy for TCL 10 Pro, evident by TCL’s website for the TCL 10  
11 Pro which focuses on the display with statements like “Display Greatness with  
12 Unparalleled Visual Power, “Brilliant Color, Clarity and Contrast,” and “Elevated  
13 Viewing Experience.” See <https://www.tcl.com/us/en/products/mobile/tcl-10-pro>.  
14 The TCL 10 Pro’s display is the prominent feature of the TCL 10 Pro. See *id.*

15 35. As another example, the advertising and marketing of the razr 5G’s  
16 displays are a key part of the sales strategy for razr 5G, as evident by the website for  
17 the razr 5G which focuses on the displays with photos and videos of the displays.  
18 See <https://www.motorola.com/us/smartphones-razr-gen-2/p>. The razr 5G’s  
19 displays are a prominent feature of the razr 5G. See *id.*

20 36. SEL’s patented technology, used by Defendants, improves the  
21 performance and capability of displays, allowing for an improved experience by  
22 end-users. SEL’s technology also results in higher yields reducing cost to phone  
23 providers and consumers.

24 **Licensing Negotiations And Notice Of The Asserted Patents**

25 37. Defendants have knowingly used, and are using, SEL’s patented  
26 technology without a license. Defendants’ infringement of SEL’s patented  
27 technology is willful, as described further below.



1           43.    The U.S. Patent Office duly and properly issued the '199 patent,  
2 entitled "Light emitting device and image playback device having triplet and singlet  
3 compounds in electroluminescent layer." SEL is the assignee of all rights, title, and  
4 interest in and to the '199 patent and possesses the exclusive right of recovery for  
5 past, present, and future infringement. Each and every claim of the '199 patent is  
6 valid and enforceable. A true and correct copy of the '199 patent is attached to this  
7 Complaint as Exhibit A.

8           44.    On information and belief, Defendants have directly infringed at least  
9 claims 1, 9, and 13 of the '199 patent by making, using, selling, offering for sale,  
10 and/or importing into the United States the Accused Products in violation of 35  
11 U.S.C. § 271(a). Charts providing exemplary evidence of infringement of the '199  
12 patent are attached to this Complaint as Exhibits B and C.

13           45.    On information and belief, CSOT has infringed at least claims 1, 9, and  
14 13 of the '199 patent by inducing others, including TCL and Motorola, to infringe at  
15 least said claims of the '199 patent in violation of 35 U.S.C. § 271(b). On  
16 information and belief, CSOT is also an alter ego of TCL and has induced, and  
17 continues to induce, infringement in the same ways as TCL.

18           46.    In addition, on information and belief, CSOT takes active steps to  
19 induce infringement of at least claims 1, 9, and 13 of the '199 patent by others,  
20 including TCL and Motorola, by, among other things, actively and knowingly aiding  
21 and abetting others who make, use, test, sell, license, offer to sell within the United  
22 States and import into the United States infringing products (including TCL and  
23 Motorola, authorized dealers and repair service providers, retailers, consumers, and  
24 end users), and CSOT takes such active steps knowing that those steps will induce,  
25 encourage and facilitate direct infringement by others. For example, on information  
26 and belief, CSOT induces TCL to maintain and/or provide content for web sites  
27 (*see, e.g.*, <https://www.tcl.com/us/en/products/mobile/tcl-10-pro/t799b>;



1 <https://support.tcl.com/us-mobile-devices>), that offer technical, promotional, and  
2 support information regarding CSOT's products accused of infringement in this  
3 case. On information and belief, CSOT knows or should know that such activities  
4 induce others to directly infringe at least said claims of the '199 patent. CSOT had  
5 actual notice of the '199 patent and that the '199 patent is valid at least as of March  
6 10, 2021. CSOT induces the infringing acts while it knows or is willfully blind to  
7 the fact that its actions would induce actual infringement of the '199 patent. On  
8 information and belief, following the filing and notice of the Complaint, CSOT will  
9 continue to engage in its above-described inducement activities.

10 47. On information and belief, CSOT contributes to the infringement of at  
11 least claims 1, 9, and 13 of the '199 patent by others, including TCL and Motorola,  
12 in violation of 35 U.S.C. § 271(c). In addition, on information and belief, CSOT is  
13 an alter ego of TCL and has contributed to, and continues to contribute to,  
14 infringement in the same ways as TCL. Acts by CSOT that contribute to the  
15 infringement of others include, but are not limited to, the use and/or importation of  
16 the Accused Products. Such products are especially made or adapted for use to  
17 infringe at least said claims of the '199 patent and are at least a material part of  
18 those claims. The Accused Products, including the functionality contributing to  
19 infringement of the '199 patent, are not suitable for substantial noninfringing use.  
20 CSOT had actual notice of the '199 patent and that the '199 patent is valid at least as  
21 of March 10, 2021. CSOT continues to engage in its above-described contributory  
22 infringement activities.

23 48. By way of at least SEL's notice to Defendants on March 10, 2021 (as  
24 well as this Complaint), Defendants know of the '199 patent and perform acts that  
25 they know, or should know, induce, and/or contribute to the direct infringement of  
26 the '199 patent.

1 49. Defendants undertook and continue their infringing actions despite an  
2 objectively high likelihood that such activities infringed the '199 patent, which is  
3 presumed valid. For example, Defendants have been aware of an objectively high  
4 likelihood that their actions constituted, and continue to constitute, infringement of  
5 the '199 patent and that the '199 patent is valid since at least March 10, 2021, when  
6 SEL sent CSOT and TCL letters providing specific notice of each of the Asserted  
7 Patents, and identifying their relevance to the Accused Products. Defendants could  
8 not reasonably subjectively believe that their actions do not constitute infringement  
9 of the '199 patent, nor could they reasonably subjectively believe that the '199  
10 patent is invalid. Despite that knowledge, subjective belief, and the objectively high  
11 likelihood that its actions constitute infringement, Defendants have continued their  
12 infringing activities. On information and belief, Defendants have not attempted to  
13 redesign or offered a redesign of the Accused Products to try to avoid infringement  
14 of the '199 patent. As such, Defendants willfully infringe the '199 patent.

15 50. SEL has been irreparably harmed by Defendants' infringement of the  
16 '199 patent and will continue to be harmed unless and until Defendants'  
17 infringement is enjoined by this Court.

18 51. By its actions, Defendants have injured SEL and are liable to SEL for  
19 infringement of the '199 patent pursuant to 35 U.S.C. § 271. SEL is entitled to  
20 damages as set forth in at least 35 U.S.C. §§ 284 and 285.

21 **COUNT II**

22 **(Infringement of U.S. Patent No. 9,208,717)**

23 52. SEL incorporates by reference the allegations in the preceding  
24 paragraphs of its Complaint.

25 53. The U.S. Patent Office duly and properly issued the '717 patent,  
26 entitled "Semiconductor device and driving method thereof." SEL is the assignee of  
27 all rights, title, and interest in and to the '717 patent and possesses the exclusive  
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1 right of recovery for past, present, and future infringement. Each and every claim of  
2 the '717 patent is valid and enforceable. A true and correct copy of the '717 patent  
3 is attached to this Complaint as Exhibit D.

4 54. On information and belief, Defendants have directly infringed at least  
5 claims 1, 7, 13, 19, 25, 31, 37, and 43 of the '717 patent by making, using, selling,  
6 offering for sale, and/or importing into the United States the Accused Products in  
7 violation of 35 U.S.C. § 271(a). Charts providing exemplary evidence of  
8 infringement of the '717 patent are attached to this Complaint as Exhibits E and F.

9 55. On information and belief, CSOT has infringed at least claims 1, 7, 13,  
10 19, 25, 31, 37, and 43 of the '717 patent by inducing others, including TCL and  
11 Motorola, to infringe at least said claims of the '717 patent in violation of 35 U.S.C.  
12 § 271(b). In addition, on information and belief, CSOT is an alter ego of TCL and  
13 has induced, and continues to induce, infringement in the same ways as TCL.

14 56. In addition, on information and belief, CSOT takes active steps to  
15 induce infringement of at least claims 1, 7, 13, 19, 25, 31, 37, and 43 of the '717  
16 patent by others, including TCL and Motorola, by, among other things, actively and  
17 knowingly aiding and abetting others who make, use, test, sell, license, offer to sell  
18 within the United States and import into the United States infringing products  
19 (including TCL and Motorola, authorized dealers and repair service providers,  
20 retailers, consumers, and end users), and CSOT takes such active steps knowing that  
21 those steps will induce, encourage and facilitate direct infringement by others. For  
22 example, on information and belief, CSOT induces TCL to maintain and/or provide  
23 content for web sites (*see, e.g.*, [https://www.tcl.com/us/en/products/mobile/tcl-10-](https://www.tcl.com/us/en/products/mobile/tcl-10-pro/t799b)  
24 [pro/t799b](https://support.tcl.com/us-mobile-devices); <https://support.tcl.com/us-mobile-devices>), that offer technical,  
25 promotional, and support information regarding CSOT's products accused of  
26 infringement in this case. On information and belief, CSOT knows or should know  
27 that such activities induce others to directly infringe at least said claims of the '717  
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1 patent. CSOT had actual notice of the '717 patent and that the '717 patent is valid at  
2 least as of March 10, 2021. CSOT induces the infringing acts while it knows or is  
3 willfully blind to the fact that its actions would induce actual infringement of the  
4 '717 patent. On information and belief, following the filing and notice of the  
5 Complaint, CSOT will continue to engage in its above-described inducement  
6 activities.

7 57. On information and belief, CSOT contributes to the infringement of at  
8 least claims 1, 7, 13, 19, 25, 31, 37, and 43 of the '717 patent by others, including  
9 TCL and Motorola, in violation of 35 U.S.C. § 271(c). In addition, on information  
10 and belief, CSOT is an alter ego of TCL and has contributed to, and continues to  
11 contribute to, infringement in the same ways as TCL. Acts by CSOT that contribute  
12 to the infringement of others include, but are not limited to, the use and/or  
13 importation of the Accused Products. Such products are especially made or adapted  
14 for use to infringe at least said claims of the '717 patent and are at least a material  
15 part of those claims. The Accused Products, including the functionality contributing  
16 to infringement of the '717 patent, are not suitable for substantial noninfringing use.  
17 CSOT had actual notice of the '717 patent and that the '717 patent is valid at least as  
18 of March 10, 2021. CSOT continues to engage in its above-described contributory  
19 infringement activities.

20 58. By way of at least SEL's negotiations with CSOT since at least January  
21 28, 2021, and SEL's notice to Defendants on March 10, 2021 (as well as this  
22 Complaint), Defendants know of the '717 patent and perform acts that they know, or  
23 should know, induce, and/or contribute to the direct infringement of the '717 patent.

24 59. Defendants undertook and continue their infringing actions despite an  
25 objectively high likelihood that such activities infringed the '717 patent, which is  
26 presumed valid. For example, Defendants have been aware of an objectively high  
27 likelihood that their actions constituted, and continue to constitute, infringement of  
28

1 the '717 patent and that the '717 patent is valid since at least March 10, 2021, when  
2 SEL sent CSOT and TCL letters providing specific notice of each of the Asserted  
3 Patents, and identifying their relevance to the Accused Products, and since the  
4 parties met on January 28, 2021. Defendants could not reasonably subjectively  
5 believe that their actions do not constitute infringement of the '717 patent, nor could  
6 they reasonably subjectively believe that the '717 patent is invalid. Despite that  
7 knowledge, subjective belief, and the objectively high likelihood that its actions  
8 constitute infringement, Defendants have continued their infringing activities. On  
9 information and belief, Defendants have not attempted to redesign or offered a  
10 redesign of the Accused Products to try to avoid infringement of the '717 patent. As  
11 such, Defendants willfully infringe the '717 patent.

12 60. SEL has been irreparably harmed by Defendants' infringement of the  
13 '717 patent and will continue to be harmed unless and until Defendants'  
14 infringement is enjoined by this Court.

15 61. By its actions, Defendants have injured SEL and are liable to SEL for  
16 infringement of the '717 patent pursuant to 35 U.S.C. § 271. SEL is entitled to  
17 damages as set forth in at least 35 U.S.C. §§ 284 and 285.

18 **COUNT III**

19 **(Infringement of U.S. Patent No. 10,680,049)**

20 62. SEL incorporates by reference the allegations in the preceding  
21 paragraphs of its Complaint.

22 63. The U.S. Patent Office duly and properly issued the '049 patent,  
23 entitled "Light emitting device." SEL is the assignee of all rights, title, and interest  
24 in and to the '049 patent and possesses the exclusive right of recovery for past,  
25 present, and future infringement. Each and every claim of the '049 patent is valid  
26 and enforceable. A true and correct copy of the '049 patent is attached to this  
27 Complaint as Exhibit G.

1           64. On information and belief, Defendants have directly infringed at least  
2 claims 1 and 4 of the '049 patent by making, using, selling, offering for sale, and/or  
3 importing into the United States the Accused Products in violation of 35 U.S.C. §  
4 271(a). Charts providing exemplary evidence of infringement of the '049 patent are  
5 attached to this Complaint as Exhibits H and I.

6           65. On information and belief, CSOT has infringed at least claims 1 and 4  
7 of the '049 patent by inducing others, including TCL and Motorola, to infringe at  
8 least said claims of the '049 patent in violation of 35 U.S.C. § 271(b). In addition,  
9 on information and belief, CSOT is an alter ego of TCL and has induced, and  
10 continues to induce, infringement in the same ways as TCL.

11           66. In addition, on information and belief, CSOT takes active steps to  
12 induce infringement of at least claims 1 and 4 of the '049 patent by others, including  
13 TCL and Motorola, by, among other things, actively and knowingly aiding and  
14 abetting others who make, use, test, sell, license, offer to sell within the United  
15 States and import into the United States infringing products (including TCL and  
16 Motorola, authorized dealers and repair service providers, retailers, consumers, and  
17 end users), and CSOT takes such active steps knowing that those steps will induce,  
18 encourage and facilitate direct infringement by others. For example, on information  
19 and belief, CSOT induces TCL to maintain and/or provide content for web sites  
20 (*see, e.g.*, <https://www.tcl.com/us/en/products/mobile/tcl-10-pro/t799b>;  
21 <https://support.tcl.com/us-mobile-devices>), that offer technical, promotional, and  
22 support information regarding CSOT's products accused of infringement in this  
23 case. On information and belief, CSOT knows or should know that such activities  
24 induce others to directly infringe at least said claims of the '049 patent. CSOT had  
25 actual notice of the '049 patent and that the '049 patent is valid at least as of March  
26 10, 2021. CSOT induces the infringing acts while it knows or is willfully blind to  
27 the fact that its actions would induce actual infringement of the '049 patent. On  
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1 information and belief, following the filing and notice of the Complaint, CSOT will  
2 continue to engage in its above-described inducement activities.

3 67. On information and belief, CSOT contributes to the infringement of at  
4 least claims 1 and 4 of the '049 patent by others, including TCL and Motorola, in  
5 violation of 35 U.S.C. § 271(c). In addition, on information and belief, CSOT is an  
6 alter ego of TCL and has contributed to, and continues to contribute to, infringement  
7 in the same ways as TCL. Acts by CSOT that contribute to the infringement of  
8 others include, but are not limited to, the use and/or importation of the Accused  
9 Products. Such products are especially made or adapted for use to infringe at least  
10 said claims of the '049 patent and are at least a material part of those claims. The  
11 Accused Products, including the functionality contributing to infringement of the  
12 '049 patent, are not suitable for substantial noninfringing use. CSOT had actual  
13 notice of the '049 patent and that the '049 patent is valid at least as of March 10,  
14 2021. CSOT continues to engage in its above-described contributory infringement  
15 activities.

16 68. By way of at least SEL's notice to Defendants on March 10, 2021 (as  
17 well as this Complaint), Defendants know of the '049 patent and perform acts that  
18 they know, or should know, induce, and/or contribute to the direct infringement of  
19 the '049 patent.

20 69. Defendants undertook and continue their infringing actions despite an  
21 objectively high likelihood that such activities infringed the '049 patent, which is  
22 presumed valid. For example, Defendants have been aware of an objectively high  
23 likelihood that their actions constituted, and continue to constitute, infringement of  
24 the '049 patent and that the '049 patent is valid since at least March 10, 2021, when  
25 SEL sent CSOT and TCL letters providing specific notice of each of the Asserted  
26 Patents, and identifying their relevance to the Accused Products. Defendants could  
27 not reasonably subjectively believe that their actions do not constitute infringement  
28

1 of the '049 patent, nor could they reasonably subjectively believe that the '049  
2 patent is invalid. Despite that knowledge, subjective belief, and the objectively high  
3 likelihood that its actions constitute infringement, Defendants have continued their  
4 infringing activities. On information and belief, Defendants have not attempted to  
5 redesign or offered a redesign of the Accused Products to try to avoid infringement  
6 of the '049 patent. As such, Defendants willfully infringe the '049 patent.

7 70. SEL has been irreparably harmed by Defendants' infringement of the  
8 '049 patent and will continue to be harmed unless and until Defendants'  
9 infringement is enjoined by this Court.

10 71. By its actions, Defendants have injured SEL and are liable to SEL for  
11 infringement of the '049 patent pursuant to 35 U.S.C. § 271. SEL is entitled to  
12 damages as set forth in at least 35 U.S.C. §§ 284 and 285.

13 **COUNT IV**

14 **(Infringement of U.S. Patent No. 10,777,290)**

15 72. SEL incorporates by reference the allegations in the preceding  
16 paragraphs of its Complaint.

17 73. The U.S. Patent Office duly and properly issued the '290 patent,  
18 entitled "Semiconductor device." SEL is the assignee of all rights, title, and interest  
19 in and to the '290 patent and possesses the exclusive right of recovery for past,  
20 present, and future infringement. Each and every claim of the '290 patent is valid  
21 and enforceable. A true and correct copy of the '290 patent is attached to this  
22 Complaint as Exhibit J.

23 74. On information and belief, Defendants have directly infringed at least  
24 claims 1, 2, and 3 of the '290 patent by making, using, selling, offering for sale,  
25 and/or importing into the United States the Accused Products in violation of 35  
26 U.S.C. § 271(a). Charts providing exemplary evidence of infringement of the '290  
27 patent are attached to this Complaint as Exhibits K and L.



1           75. On information and belief, CSOT has infringed at least claims 1, 2, and  
2 3 of the '290 patent by inducing others, including TCL and Motorola, to infringe at  
3 least said claims of the '290 patent in violation of 35 U.S.C. § 271(b). In addition,  
4 on information and belief, CSOT is an alter ego of TCL and has induced, and  
5 continues to induce, infringement in the same ways as TCL.

6           76. In addition, on information and belief, CSOT takes active steps to  
7 induce infringement of at least claims 1, 2, and 3 of the '290 patent by others,  
8 including TCL and Motorola, by, among other things, actively and knowingly aiding  
9 and abetting others who make, use, test, sell, license, offer to sell within the United  
10 States and import into the United States infringing products (including TCL and  
11 Motorola, authorized dealers and repair service providers, retailers, consumers, and  
12 end users), and CSOT takes such active steps knowing that those steps will induce,  
13 encourage and facilitate direct infringement by others. For example, CSOT induces  
14 TCL to maintain and/or provide content for web sites (*see, e.g.*,  
15 <https://www.tcl.com/us/en/products/mobile/tcl-10-pro/t799b>;  
16 <https://support.tcl.com/us-mobile-devices>), that offer technical, promotional, and  
17 support information regarding CSOT's products accused of infringement in this  
18 case. On information and belief, CSOT knows or should know that such activities  
19 induce others to directly infringe at least said claims of the '290 patent. CSOT had  
20 actual notice of the '290 patent and that the '290 patent is valid at least as of March  
21 10, 2021. CSOT induces the infringing acts while it knows or is willfully blind to  
22 the fact that its actions would induce actual infringement of the '290 patent. On  
23 information and belief, following the filing and notice of the Complaint, CSOT will  
24 continue to engage in its above-described inducement activities.

25           77. On information and belief, CSOT contributes to the infringement of at  
26 least claims 1, 2, and 3 of the '290 patent by others, including TCL and Motorola, in  
27 violation of 35 U.S.C. § 271(c). In addition, on information and belief, CSOT is an  
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1 alter ego of TCL and has contributed to, and continues to contribute to, infringement  
2 in the same ways as TCL. Acts by CSOT that contribute to the infringement of  
3 others include, but are not limited to, the use and/or importation of the Accused  
4 Products. Such products are especially made or adapted for use to infringe at least  
5 said claims of the '290 patent and are at least a material part of those claims. The  
6 Accused Products, including the functionality contributing to infringement of the  
7 '290 patent, are not suitable for substantial noninfringing use. CSOT had actual  
8 notice of the '290 patent and that the '290 patent is valid at least as of March 10,  
9 2021. CSOT continues to engage in its above-described contributory infringement  
10 activities.

11 78. By way of at least SEL's notice to Defendants on March 10, 2021 (as  
12 well as this Complaint), Defendants know of the '290 patent and perform acts that  
13 they know, or should know, induce, and/or contribute to the direct infringement of  
14 the '290 patent.

15 79. Defendants undertook and continue their infringing actions despite an  
16 objectively high likelihood that such activities infringed the '290 patent, which is  
17 presumed valid. For example, Defendants have been aware of an objectively high  
18 likelihood that their actions constituted, and continue to constitute, infringement of  
19 the '290 patent and that the '290 patent is valid since at least March 10, 2021, when  
20 SEL sent CSOT and TCL letters providing specific notice of each of the Asserted  
21 Patents, and identifying their relevance to the Accused Products. Defendants could  
22 not reasonably subjectively believe that their actions do not constitute infringement  
23 of the '290 patent, nor could they reasonably subjectively believe that the '290  
24 patent is invalid. Despite that knowledge, subjective belief, and the objectively high  
25 likelihood that its actions constitute infringement, Defendants have continued their  
26 infringing activities. On information and belief, Defendants have not attempted to  
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1 redesign or offered a redesign of the Accused Products to try to avoid infringement  
2 of the '290 patent. As such, Defendants willfully infringe the '290 patent.

3 80. SEL has been irreparably harmed by Defendants' infringement of the  
4 '290 patent and will continue to be harmed unless and until Defendants'  
5 infringement is enjoined by this Court.

6 81. By its actions, Defendants have injured SEL and are liable to SEL for  
7 infringement of the '290 patent pursuant to 35 U.S.C. § 271. SEL is entitled to  
8 damages as set forth in at least 35 U.S.C. §§ 284 and 285.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, SEL respectfully requests that this Court enter judgment  
11 against Defendants:

- 12 a) Finding that Defendants directly infringe the Asserted Patents;  
13 b) That Defendants have induced infringement of the Asserted Patents;  
14 c) That Defendants have contributed to infringement of the Asserted  
15 Patents;  
16 d) That Defendants have willfully infringed the Asserted Patents;  
17 e) Awarding damages adequate to compensate SEL for the patent  
18 infringement that has occurred, in accordance with 35 U.S.C. § 284, including an  
19 assessment of pre-judgment and post-judgment interest and costs, and an accounting  
20 as appropriate for infringing activity not captured within any applicable jury verdict  
21 and/or up to the judgment and an award by the Court of additional damages for any  
22 such acts of infringement;  
23 f) Awarding SEL an ongoing royalty for Defendants' post-verdict  
24 infringement, payable on each product offered by Defendants that is found to  
25 infringe one or more of the Asserted Patents, and on all future products that are not  
26 colorably different from those found to infringe, or in the alternative, permanently  
27 enjoining Defendants from further infringement;

1 g) Providing an award of all other damages permitted by 35 U.S.C. § 284,  
2 including increased damages up to three times the amount of compensatory damages  
3 found;

4 h) Finding that this is an exceptional case and an award to SEL of its  
5 costs, expenses, and reasonable attorneys' fees incurred in this action as provided by  
6 35 U.S.C. § 285; and

7 i) Providing such other relief, including other monetary and equitable  
8 relief, as this Court deems just and proper.

9 **DEMAND FOR JURY TRIAL**

10 Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, SEL demands  
11 a trial by jury on all issues on which trial by jury is available under applicable law.  
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1 Dated: May 20, 2022

FISH & RICHARDSON P.C.

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By: /s/ Christopher S. Marchese

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