

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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AU Optronics Corporation  
No. 1, Li-Hsin Road 2  
Hsinchu Science Park  
Hsinchu, Taiwan, R.O.C.,

*Plaintiff,*

vs.

LG.Philips LCD Co., Ltd.  
17th Fl., West Tower  
LG Twin Towers  
20 Yoido-dong  
Youngdungpo-gu, Seoul, 150721, South Korea

and

LG.Philips LCD America  
150 East Brokaw Road  
San Jose, CA 95112,

*Defendants.*

07 C 0137  
THERESA M. OWENS  
CLERK US DIST COURT  
WD OF WI

Civil Action No.: \_\_\_\_\_

**JURY TRIAL DEMANDED**

**COMPLAINT AND DEMAND FOR JURY TRIAL**

AU Optronics Corporation, for its Complaint, avers as follows:

1. AU Optronics Corporation is a Taiwanese corporation with its principal place of business at No. 1, Li-Hsin Road 2, Hsinchu Science Park, Hsinchu, Taiwan, R.O.C.
2. Upon information and belief, LG.Philips LCD Co., Ltd. ("LPL") is a corporation organized under the laws of the Republic of Korea, with its principal place of business in Seoul, South Korea.
3. Upon information and belief, LG.Philips LCD America ("LPLA") is a corporation organized under the laws of the State of California, with its principal place of business in San Jose, California.

4. This is an action arising under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction based on 28 U.S.C. §§ 1331 and 1338(a). Venue is based on 28 U.S.C. §§ 1391 and 1400(b).

5. The Court has personal jurisdiction over LPL and LPLA.

6. AU Optronics Corporation is the owner by assignment of United States Patent No. 6,689,629 (“the ’629 patent”), which was duly and legally issued by the United States Patent and Trademark Office on February 10, 2004. A copy of the ’629 patent is attached to this Complaint as Exhibit A.

7. AU Optronics Corporation is the owner by assignment of United States Patent No. 6,976,781 (“the ’781 patent”), which was duly and legally issued by the United States Patent and Trademark Office on December 20, 2005. A copy of the ’781 patent is attached to this Complaint as Exhibit B.

8. AU Optronics Corporation is the owner by assignment of United States Patent No. 6,778,160 (“the ’160 patent”), which was duly and legally issued by the United States Patent and Trademark Office on August 17, 2004. A copy of the ’160 patent is attached to this Complaint as Exhibit C.

**COUNT ONE – INFRINGEMENT OF THE ’629 PATENT**

9. LPL and LPLA have each infringed and are continuing to infringe one or more claims of the ’629 patent, directly, contributorily, and/or by inducement, by making, using, selling and/or offering to sell in this country, and/or importing into this country liquid crystal display devices in violation of 35 U.S.C. § 271.

10. On information and belief, LPL and LPLA's infringement of the '629 patent is willful and deliberate, thereby rendering this an exceptional case pursuant to 35 U.S.C. §§ 284 and 285.

11. AU Optronics Corporation has been damaged by LPL and LPLA's infringing activities and will be irreparably injured unless such infringing activities are enjoined by this Court.

**COUNT TWO – INFRINGEMENT OF THE '781 PATENT**

12. LPL and LPLA have each infringed and are continuing to infringe one or more claims of the '781 patent, directly, contributorily, and/or by inducement, by making, using, selling and/or offering to sell in this country, and/or importing into this country liquid crystal display devices in violation of 35 U.S.C. § 271.

13. On information and belief, LPL and LPLA's infringement of the '781 patent is willful and deliberate, thereby rendering this an exceptional case pursuant to 35 U.S.C. §§ 284 and 285.

14. AU Optronics Corporation has been damaged by LPL and LPLA's infringing activities and will be irreparably injured unless such infringing activities are enjoined by this Court.

**COUNT THREE – INFRINGEMENT OF THE '160 PATENT**

15. LPL and LPLA have each infringed and are continuing to infringe one or more claims of the '160 patent, directly, contributorily, and/or by inducement, by making, using, selling and/or offering to sell in this country, and/or importing into this country liquid crystal display devices in violation of 35 U.S.C. § 271.

16. On information and belief, LPL and LPLA's infringement of the '160 patent is willful and deliberate, thereby rendering this an exceptional case pursuant to 35 U.S.C. §§ 284 and 285.

17. AU Optronics Corporation has been damaged by LPL and LPLA's infringing activities and will be irreparably injured unless such infringing activities are enjoined by this Court.

**PRAYER FOR RELIEF**

Wherefore, AU Optronics Corporation prays for judgment that:

1. LPL and LPLA have directly and willfully infringed, willfully contributed to the infringement of, and willfully induced infringement of the '629, '781 and '160 patents;
2. Preliminary and permanently enjoins LPL and LPLA, its officers, agents, servants, employees, attorneys, successors and assigns, and all others in active concert or participation with any one of them, from infringing the '629, '781 and '160 patents;
3. Awards AU Optronics Corporation damages adequate to compensate for LPL's and LPLA's infringement of the '629, '781 and '160 patents together with interest and costs;
4. Trebles the damages assessed pursuant to 35 U.S.C. § 284;
5. Awards AU Optronics Corporation's its attorneys' fees pursuant to 35 U.S.C. § 285; and
6. Awards such other and further relief as this Court may deem proper.

**REQUEST FOR JURY TRIAL**

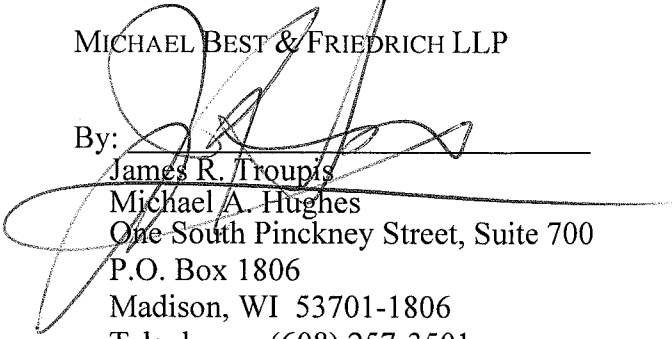
Plaintiff AU Optronics Corporation hereby demands a trial by jury.

DATED this 8th day of March, 2007.

RESPECTFULLY SUBMITTED BY

MICHAEL BEST & FRIEDRICH LLP

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