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11 UNITED STATES DISTRICT COURT
12 FOR THE DISTRICT OF NEVADA

14 SOUNDVIEW TECHNOLOGIES, INC.,

CV-S-02-1066-LDG-RJJ

15 Plaintiff,

17 v.

) COMPLAINT FOR PATENT
) INFRINGEMENT

18 APEX DIGITAL, INC.,)
19 AMOISONIC ELECTRONICS, INC.,)
20 HAIER AMERICA TRADING, LLC,)
21 HATZLACHH SUPPLY, INC.,)
22 HISENSE USA CORPORATION,)
23 INFORMATION DISPLAY)
24 TECHNOLOGIES, LLC,)
25 KONKA USA LTD,)
26 PRIMA TECHNOLOGY, INC.,)
27 PROTON CORPORATION,)
28 TRANSGLOBAL TRADING, INC.,)
UNIREX CORPORATION,)
VERTEX LCD, INC., and)
ZEUX TECHNOLOGY CORPORATION,)

Defendants.

SCHRECK BRIGNONE GODFREY
300 SOUTH FOURTH STREET, SUITE 1200
LAS VEGAS, NEVADA 89101
(702) 382-2101

1 Plaintiff Soundview Technologies, Inc. ("SOUNDVIEW"), complains of defendants
2 Apex Digital, Inc. ("Apex"), Amoisonic Electronics, Inc. ("Amoisonic"), Haier America Trading,
3 LLC ("Haier"), Hatzlachh Supply, Inc. ("Hatzlachh"), Hisense USA Corporation ("Hisense"), In-
4 formation Display Technologies, LLC ("IDT"), Konka USA LTD ("Konka"), Prima
5 Technology, Inc. ("Prima"), Proton Corporation ("Proton"), Transglobal Trading, Inc.
6 ("Transglobal"), Unirex Corporation ("Unirex"), Vertex LCD, Inc. ("Vertex") and Zeux
7 Technology Corporation ("Zeux") as follows:
8

9 1. This is a claim for patent infringement arising under the patent laws of the United
10 States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject
11 matter under 28 U.S.C. § 1338(a). Venue is proper in this district under 28 U.S.C. §§ 1391 and
12 1400(b). All of the defendants named herein attended the EIA/CEA Consumer Electronics Show
13 in January 2002 in Las Vegas, Nevada, and offered to sell infringing television sets as described
14 below.
15

16 2. SOUNDVIEW is a Delaware corporation having its principal place of business at
17 Two Soundview Drive, Greenwich, Connecticut 06830.
18

19 3. Apex is a California corporation having a place of business at Ontario, California,
20 and has used and offered to sell the televisions accused herein of infringement in this judicial
21 district.
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23 4. Amoisonic is a California corporation having a place of business at Chino,
24 California, and has used and offered to sell the televisions accused herein of infringement in this
25 judicial district.
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1 5. Haier is a New York limited liability corporation having a place of business at
2 New York, New York, and has used and offered to sell the televisions accused herein of
3 infringement in this judicial district.

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5 6. Hatzlachh is a New York corporation having a place of business at New York,
6 New York, and has used and offered to sell the televisions accused herein of infringement in this
7 judicial district.

8 7. Hisense is a California corporation having a place of business at City of Industry,
9 California, and has used and offered to sell the televisions accused herein of infringement in this
10 judicial district.

11
12 8. IDT is a Florida limited liability corporation having a place of business at Sunrise,
13 Florida, and has used and offered to sell the televisions accused herein of infringement in this
14 judicial district.

15 9. Konka is a California corporation having a place of business at San Diego,
16 California, and has used and offered to sell the televisions accused herein of infringement in this
17 judicial district.

18
19 10. Prima is a Washington corporation having a place of business at Seattle,
20 Washington, and has used and offered to sell the televisions accused herein of infringement in
21 this judicial district.

22 11. Proton is a California corporation having a place of business at Cerritos,
23 California, and has used and offered to sell the televisions accused herein of infringement in this
24 judicial district.
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1 12. Transglobal is a California corporation having a place of business at Reseda,
2 California, and has used and offered to sell the televisions accused herein of infringement in this
3 judicial district.

4 13. Unirex is a California corporation having a place of business at Vernon,
5 California, and has used and offered to sell the televisions accused herein of infringement in this
6 judicial district.

7 14. Vertex is a California corporation having a place of business at Placentia,
8 California, and has used and offered to sell the televisions accused herein of infringement in this
9 judicial district.

10 15. Zeux is a California corporation having a place of business at Monterey Park,
11 California, and has used and offered to sell the televisions accused herein of infringement in this
12 judicial district.

13 16. SOUNDVIEW is the owner of all right, title and interest in United States Patent
14 No. 4,554,584, entitled "Video and Audio Blanking System" issued November 19, 1985 which
15 has been reexamined by the United States Patent Office and confirmed in Reexamination
16 Certificate No. B1 4,554,584, which issued March April 7, 1998. SOUNDVIEW owns and has
17 standing to sue for infringement of the '584 patent.

18 17. The value of the '584 patent has been recognized throughout the television
19 industry. Thirteen major television receiver manufacturers and distributors have now accepted
20 licenses under the '584 patent, including companies with the majority market share of the U.S.
21 television market. Licensed parties include Thomson, Matsushita, Orion, Samsung, Hitachi,
22 Pioneer (via settlement, not license), Daewoo, Philips, Funai, LG Electronics, Sanyo, JVC and
23 Loewe.

1 18. Defendants have each infringed at least claim 1 of the '584 patent through, among
2 other activities, the manufacture, use, importation, sale and/or offer for sale of 13" or greater
3 televisions capable of receiving and acting on content advisory data transmitted in accordance
4 with EIA-608A, EIA-608B, EIA-744 and the like. This feature in a television set is commonly
5 known as the v-chip. Defendants have also infringed the '584 patent by inducing others to
6 infringe and by contributing to the infringement by others, with knowledge of the '584 patent and
7 intent to cause such infringement.
8

9 19. Defendants' respective combined infringement, contributory infringement and/or
10 inducement to infringe has injured SOUNDVIEW and SOUNDVIEW is entitled to recover
11 damages adequate to compensate it for such infringement, but in no event less than a reasonable
12 royalty.
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14 20. SOUNDVIEW has given each defendant actual notice of the '584 patent and their
15 infringement.
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17 21. Each defendant has respectively failed to comply with its duty of care to
18 determine whether or not it was infringing, and upon determining infringement to cease the
19 infringement or obtain authorization through a license. Defendants failed to obtain a competent
20 opinion of counsel of no infringement liability, or else did obtain an opinion of counsel, and that
21 opinion was that there is liability.
22

23 22. Defendants' infringement, contributory infringement and/or inducement to
24 infringe has been willful and deliberate and has injured and will continue to injure
25 SOUNDVIEW unless and until this Court enters an injunction prohibiting further infringement
26 and, specifically, enjoining further manufacture, use, sale, importation and/or offer for sale of
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1 televisions within the scope of the '584 patent and enjoining the practice of the inventions
2 claimed in the '584 patent.

3 WHEREFORE, plaintiff, SOUNDVIEW, asks this Court to enter judgment against
4 defendants, individually and jointly, and against their subsidiaries, affiliates, agents, servants,
5 employees and all persons in active concert or participation with them, granting the following
6 relief:
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- 8 1. An award of damages adequate to compensate SOUNDVIEW for the
9 infringement that has occurred, together with prejudgment interest from
10 the date infringement of the '584 patent began;
- 11 2. Increased damages as permitted under 35 U.S.C. § 284;
- 12 3. A finding that this case is exceptional and an award to SOUNDVIEW of
13 its attorneys' fees and costs as provided by 35 U.S.C. § 285;
- 14 4. A permanent injunction prohibiting further infringement, inducement and
15 contributory infringement of the '584 patent, unless and until each
16 defendant is licensed by SOUNDVIEW; and,
- 17 5. Such other and further relief as this Court or a jury may deem proper and
18 just.
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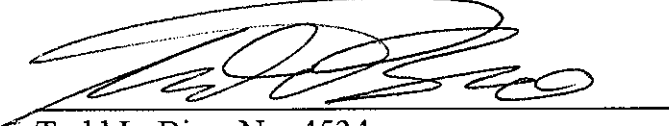
JURY DEMAND

SOUNDVIEW demands a trial by jury on all issues presented in this Complaint.

DATED: August 14, 2002.

SOUNDVIEW TECHNOLOGIES, INC.

By:



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