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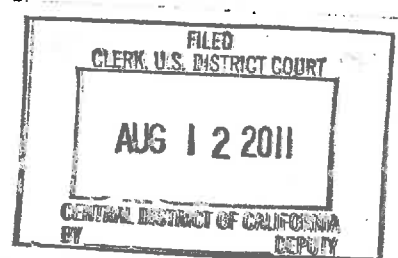
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6 *Attorneys for Plaintiffs*

7
8 UNITED STATES DISTRICT COURT

9 DISTRICT OF CENTRAL CALIFORNIA

10 CV11-06643 JFW(MANX)

11 COMPUTER STORES)
12 NORTHWEST, INC. AND SCALAR)
13 CORPORATION,)

13 Plaintiffs,)

14 v.)

15 ANMO ELECTRONICS)
16 CORPORATION,)

17 Defendant.)

Case No. ..

) COMPLAINT FOR PATENT
) INFRINGEMENT

) DEMAND FOR JURY TRIAL

18 For their Complaint, plaintiffs Computer Stores Northwest, Inc. and Scalar
19 Corporation allege, based on actual knowledge with respect to plaintiffs and plaintiffs'
20 acts, and on information and belief with respect to other matters, as follows:

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STATUTORY JURISDICTION

1. This Court has federal question jurisdiction under 28 U.S.C. §§ 1331 and 1338(a), because this action asserts a claim under 35 U.S.C. § 271 for patent infringement.

NATURE OF THE CASE

2. This is a civil suit for patent infringement under the patent laws of the United States, 35 U.S.C. §§ 1 et seq., and specifically under 35 U.S.C. §§ 271 and 281.

THE PARTIES

3. Plaintiff Computer Stores Northwest, Inc. ("CSNW") is an Oregon corporation, with a principal place of business and a mailing address at 6077A S.W. Lakeview Boulevard, Lake Oswego, Oregon 97035.

4. Plaintiff Scalar Corporation ("Scalar") is a Japanese corporation, with a principal place of business and a mailing address at San-Ei Building 1-22-2, 2nd Floor, Nishi-Shinjuku, Shinjuku-Ku, Tokyo 160-0023, Japan.

5. Defendant AnMo Electronics Corporation ("AnMo") is a Taiwan company with its headquarters and a mailing address at 5F-1, No.76, Sec. 2, Dung-Da Road, Hsinchu 300, Taiwan.

6. AnMo's distributor in the United States is Dunwell Tech, Inc. ("Dunwell"), a California corporation doing business at least as BigC.com and

1 SunriseDino.com, with a principal place of business and a mailing address at 20655 S.
2 Western Avenue #116, Torrance, California 90501.

3 7. On March 16, 2010, CSNW and Scalar filed an action for patent
4 infringement against AnMo and Dunwell in the United States District Court for the
5 District of Oregon, Case No. 10-CV-284-HZ. That case is still pending.

6 8. On June 9, 2011, AnMo was dismissed from the Oregon action for lack of
7 personal jurisdiction.

8 JURISDICTION & VENUE

9 9. This Court has personal jurisdiction in this action because AnMo (a)
10 conducts business in the State of California, (b) purposely directs activities to the State
11 of California, (c) knows or should know that its products will reach the State of
12 California in the stream of commerce, in connection with the allegations of this
13 lawsuit, and (d) has admitted that personal jurisdiction is proper in the State of
14 California.

15 10. Attached as Exhibit A is a true and correct portion of a transcript of the
16 hearing on AnMo's motion to dismiss in District of Oregon Case No. 10-CV-284-HZ,
17 in which AnMo's counsel admits that personal jurisdiction over AnMo would be
18 proper in the State of California.

19 11. Attached as Exhibit B is a true and correct portion of the Declaration of
20 Paul Wu, the President of AnMo, in support of AnMo's motion to dismiss in District

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1 of Oregon Case No. 10-CV-284-HZ, in which Mr. Wu states that Dunwell, a
2 California corporation with its principal place of business in the Central District of
3 California, is AnMo's distributor in the United States.

4 12. On information and belief, AnMo has sold more than 10,000 Dino-Lite
5 handheld portable magnifiers to Dunwell.

6 13. AnMo owns or controls the websites at <http://www.anmo.com.tw/> and
7 <http://www.dino-lite.com/>. Both websites can be accessed throughout the United
8 States, including in the State of California.

9 14. Attached as Exhibit C are selected web pages from
10 <http://www.anmo.com.tw/> and <http://www.dino-lite.com/> that (a) identify that AnMo
11 manufactures, or caused to be manufactured, one or more handheld portable magnifiers
12 under the name Dino-Lite, (b) identify that the United States distributor of AnMo's
13 Dino-Lite products is www.BigC.com, and (c) contain product information about the
14 Dino-Lite products, and software and user manuals related to the Dino-Lite products,
15 that are available for viewing and downloading from AnMo into the United States,
16 including into the State of California.

17 15. Venue is proper in this judicial district under 28 U.S.C. § 1391 and 1400.

18 THE ASSERTED PATENT

19 16. Plaintiff Scalar owns U.S. Patent No. 5,442,489 ("the '489 patent"),
20 issued August 15, 1995. Scalar has granted a license to Plaintiff CSNW, giving
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1 CSNW the exclusive right to manufacture, sell, and offer for sale certain products in
2 the United States under the '489 patent.

3 17. The '489 patent covers handheld portable magnifiers. These magnifiers
4 may be used, for example, for educational, scientific, or law enforcement purposes,
5 and may display images on a display such as a computer monitor. The '489 patent is
6 derived from a patent application that was filed in the U.S. Patent and Trademark
7 Office ("USPTO") on September 23, 1994. USPTO examined the application,
8 determined that the claimed invention was novel and nonobvious, and awarded the
9 '489 patent on August 15, 1995. A copy of the '489 patent, as originally issued, is
10 attached as Exhibit D.

11 18. On August 6, 2007, Scalar requested reexamination of various claims of
12 the '489 patent from USPTO, based on prior art references uncovered during
13 prosecution of the Korean and Japanese counterparts to the '489 patent. Specifically,
14 Scalar requested reexamination of claims 1, 6, 7, 11, 16, 23 and 28 of the '489 patent
15 in view of the newly uncovered references. A copy of Scalar's August 6, 2007
16 reexamination request is attached as Exhibit E.

17 19. The '489 patent was fully examined again by a new Primary Examiner
18 and two Conferee Examiners at USPTO, and on March 30, 2010, USPTO issued an Ex
19 Parte Reexamination Certificate, confirming the patentability of original claim 6,

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1 amended claims 1, 7, 11, 16, 19, 23 and 28, and newly presented claims 33-50. A
2 copy of the Ex Parte Reexamination Certificate is attached as Exhibit F.

3 20. In conjunction with CSNW's status as exclusive U.S. licensee, the
4 reexamined '489 patent gives Plaintiffs CSNW and Scalar the right to exclude others
5 from making, using, offering for sale, and selling the claimed invention within the
6 United States, and from importing the claimed invention into the United States.

7 21. Since at least as early as September 12, 2006, plaintiffs have marked their
8 products covered by the '489 patent with U.S. Pat. No. 5,442,489 in compliance with
9 35 U.S.C. § 287.

10 THE INFRINGING PRODUCTS

11 22. Defendant AnMo is making, using, offering for sale, selling, and/or
12 importing handheld portable magnifiers and teaching the use of such magnifiers,
13 including but not necessarily limited to the "Dino-Lite" series of handheld portable
14 magnifiers. The Dino-Lite product line includes at least the AM3xx series, the AM4xx
15 series, and the AD4xx series, all of which are covered by one or more claims of the
16 reexamined '489 patent. These products include, among other covered features, an
17 imaging system and a light source enclosed within a one-handed graspable case and
18 configured to display an image on an associated monitor display. A copy of the 2009
19 Dino-Lite catalog advertising the infringing products and describing their features is
20 attached as Exhibit G.

1 23. AnMo is manufacturing, or causing to be manufactured, the Dino-Lite
2 products that are being distributed and sold in the United States, including in the State
3 of California.

4 24. AnMo is selling Dino-Lite products to Dunwell, a California corporation.

5 25. AnMo is importing, or causing to be imported, Dino-Lite products into
6 the United States for distribution and sale by Dunwell in the United States, including in
7 the State of California.

8 CAUSE OF ACTION – INFRINGEMENT OF THE ‘489 PATENT

9 26. AnMo has infringed and is infringing the ‘489 patent by making, using,
10 selling, offering to sell, and/or importing handheld portable magnifiers under the name
11 “Dino-Lite,” including but not necessarily limited to the Dino-Lite AM3xx series, the
12 AM4xx series, and the AD4xx series, all of which are covered by one or more claims
13 of the ‘489 patent, without authorization from CSNW or Scalar.

14 27. Infringement by AnMo has been and continues to be willful, with
15 knowledge of the ‘489 patent and AnMo’s infringement thereof, entitling plaintiffs to
16 increased damages under 35 U.S.C. § 284 and to attorneys’ fees incurred in
17 prosecuting this action under 35 U.S.C. § 285.

18 28. CSNW and Scalar have suffered, and will continue to suffer, substantial
19 damages in an amount to be proven at trial, through lost profits, lost sales and/or lost
20 royalties, due to infringement of the ‘489 patent by AnMo.

1 29. CSNW and Scalar have suffered, and will continue to suffer, permanent
2 and irreparable injury, for which CSNW and Scalar have no adequate remedy at law.

3 30. CSNW and Scalar are entitled to relief provided by 35 U.S.C. §§ 281,
4 283, 284, and 285.

5 PRAYER FOR RELIEF

6 WHEREFORE, plaintiffs CSNW and Scalar pray for judgment as follows:

7 A. That AnMo has infringed, and is infringing, the ‘489 patent in violation of
8 35 U.S.C. § 271;

9 B. That AnMo’s infringement of the ‘489 patent is willful;

10 C. That AnMo be preliminarily and permanently enjoined against all acts of
11 infringement of the ‘489 patent pursuant to 35 U.S.C. § 283;

12 D. That AnMo be required to deliver to CSNW or Scalar for destruction any
13 and all articles in their possession and/or under their control that infringe the ‘489
14 patent, including but not limited to the Dino-Lite AM3xx series, the AM4xx series,
15 and the AD4xx series, along with any associated packaging and advertisements;

16 E. That AnMo be ordered to pay CSNW and Scalar the damages that CSNW
17 and Scalar have suffered due to infringement of the ‘489 patent by AnMo, together
18 with interest thereon and costs pursuant to 35 U.S.C. § 284, including profits lost by
19 plaintiffs as a result of infringement of the ‘489 patent; in any event plaintiffs shall be

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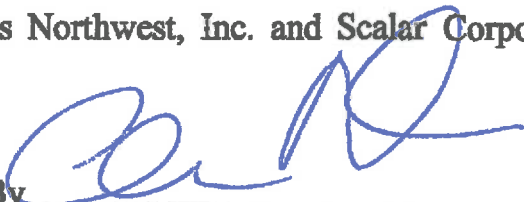
1 awarded no less than a reasonable royalty for the unauthorized manufacture and sale of
2 the patented inventions by AnMo;

3 F. That this case be declared exceptional pursuant to 35 U.S.C. § 285, due to
4 willful infringement of the '489 patent by AnMo, and that CSNW and Scalar be
5 awarded trebled damages and their reasonable attorneys' fees; and

6 G. That CSNW and Scalar be awarded such other and further relief as the
7 Court deems just and proper.

8 DEMAND FOR JURY TRIAL

9 Plaintiffs Computer Stores Northwest, Inc. and Scalar Corporation demand a
10 trial by jury.

11 By 
12 OWEN W. DUKELOW, State Bar No. 196265

13 DATED this 9th day of August, 2011.

14 Respectfully submitted,

15 KOLISCH HARTWELL, P.C.

16 By 
17 SHAWN J. KOLITCH, OSB No. 063980
(Pro Hac Vice to be Filed)
18 E-mail: shawn@khpatent.com
OWEN W. DUKELOW, State Bar No. 196265
19 E-mail: owen@khpatent.com
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Palo Alto, California 94306
Telephone: (503) 224-6655
Attorneys of Record for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge John F. Walter and the assigned discovery Magistrate Judge is Margaret A. Nagle.

The case number on all documents filed with the Court should read as follows:

CV11- 6643 JFW (MANx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

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NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Name & Address:

Shawn J. Kolitch, OSB No. 063980
Owen W. Dukelow, State Bar No. 196265
KOLISCH HARTWELL, P.C.
260 Sheridan Avenue, Suite 200
Palo Alto, California 94306

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

COMPUTER STORES NORTHWEST, INC. and
SCALAR CORPORATION

PLAINTIFF(S)

v.

ANMO ELECTRONICS CORPORATION

DEFENDANT(S).

CASE NUMBER

CV11-06643 JFW(MANx)

SUMMONS

TO: DEFENDANT(S): ANMO ELECTRONICS CORPORATION, 5F-1, No. 76, Sec. 2, Dung-Da Road, Hsinchu 300 TAIWAN

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint _____ amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Shawn J. Kolitch & Owen W. Dukelow, whose address is 260 Sheridan Avenue, Suite 200, Palo Alto, California 94306. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

AUG 12 2011

Dated: _____

Clerk, U.S. District Court

By: _____

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].