

elsewhere. LG ELECTRONICS USA, INC. may be served with process at United States Corporation Co., 701 Brazos Street, Suite 1050, Austin, Texas 78701, USA.

3. Upon information and belief, MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC. is a Delaware corporation with its principal place of business at 9351 Jeronimo Road, Irvine, California 92618, USA, and is doing business in this district and elsewhere. MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC. may be served with process at C T Corporation System, 350 North St. Paul Street, Dallas, Texas 75201, USA.

4. Upon information and belief, SAMSUNG ELECTRONICS AMERICA, INC. is a Delaware corporation with its principal place of business at 105 Challenger Road, Ridgefield Park, New Jersey 07660, USA and is doing business in this district and elsewhere. SAMSUNG ELECTRONICS AMERICA, INC. may be served with process at C T COPORATION SYSTEM, 350 North St. Paul Street, Dallas, Texas 75201, USA.

5. Upon information and belief, SIM2 USA, INC. is a Florida corporation with its principal place of business at 10108 USA Today Way, Miramar, Florida 33025, USA and is doing business in this district and elsewhere. SIM2 USA, INC. may be served with process at Coprolite Corporation, 2130 Suntrust International Center, One Southeast Third Avenue, Miami, Florida 33131, USA.

6. Upon information and belief, TOSHIBA AMERICA CONSUMER PRODUCTS, LLC is a New Jersey corporation with its principal place of business at 82 Totowa Road, Wayne, New Jersey 07470, USA and is doing business in this district and elsewhere. TOSHIBA AMERICA CONSUMER PRODUCTS, LLC may be served with

process at C T Corporation System, 350 North St. Paul Street, Dallas, Texas 75201, USA.

JURISDICTION AND VENUE

7. This action arises under the patent laws of the United States, Title 35 United States Code, particularly §§ 271 and 281 and Title 28 United States Code, particularly § 1338(a). Venue is proper in this Court under Title 28 United States Code §§ 1391(b) and (c) and 1400 (b).

CLAIM FOR PATENT INFRINGEMENT

8. On December 5, 1989, the '631 Patent, entitled "Forced Air Heat Sink Apparatus" was duly and legally issued. A copy of the '631 Patent is attached as Exhibit A and is made a part hereof. ICHL is the owner, by assignment, of the '631 Patent and possesses the right to enforce the '631 Patent.

9. The '631 Patent, in general relates to a heat sink assembly used in computers, servers, game consoles, and other consumer electronic products, to aid in the cooling of semiconductors and other electronic components.

10. Upon information and belief, Defendants sell one or more televisions or home theater projectors that contain infringing heat sinks, including but not limited to the following products: LG 52 inch DLP television model number RU-52SZ51D; Mitsubishi 65 inch DLP television model number WD-65734 and 60 inch DLP television model number WD-60734; Samsung 71 inch DLP television model number HL-S7178W and 61 inch DLP television model number HL-P6163W; SIM2 home theater projector model number HT 300 XTRA; and Toshiba 52 inch DLP television model number 52HM84. By selling products that contain infringing heat sinks, Defendants have infringed and

continue to infringe directly, by inducement, or by contributing to the infringement of the claims of the '631 patent, including but not limited to claim 3.

11. As a result of Defendants' infringing conduct, Defendants have damaged ICHL. Defendants are liable to ICHL in an amount that adequately compensates ICHL for the infringement, which by law shall be no less than a reasonable royalty.

DEMAND FOR JURY TRIAL

12. ICHL demands a jury trial on all issues triable of right by a jury.

PRAYER FOR RELIEF

13. WHEREFORE, ICHL prays for entry of judgment:

A. that all claims of U.S. Patent No. 4,884,631 have been infringed by Defendants;

B. that Defendants account for and pay to ICHL all compensatory damages and costs caused by Defendants' activities complained of herein;

C. that ICHL be granted pre-judgment and post-judgment interest on the damages caused by reason of Defendants' activity complained of herein;

D. that ICHL be granted its attorneys' fees in this action;

E. that costs be awarded to ICHL; and

F. that ICHL be granted such other and further relief that is just and proper under the circumstances.

Dated: October 9, 2008

RESPECTFULLY SUBMITTED,

/s/ Robert J. Garrey
Robert J. Garrey
State Bar No. 00703420
1400 Preston Road Suite 400
Plano, Texas 75093
Phone: 972.665.9926
Fax: 972.665.9929
Email: bgarrey@garreylaw.com