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Attorneys for Plaintiff and
Counterclaim Defendant
LG. PHILIPS LCD CO., LTD.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LG. PHILIPS LCD CO., LTD.,

Plaintiff,

vs.

TPV TECHNOLOGY, LTD., and
ENVISION PERIPHERALS, INC.,

Defendants.

Case No.

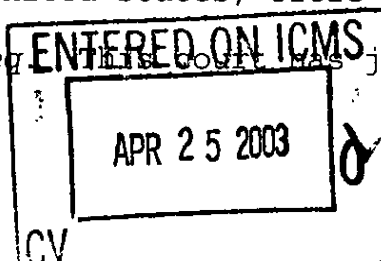
COMPLAINT FOR PATENT
INFRINGEMENT

[DEMAND FOR JURY TRIAL]

Plaintiff LG. Philips LCD Co., Ltd. ("LPL"), by its
undersigned attorneys, complains of Defendants and alleges as
follows:

JURISDICTION AND VENUE

1. This is an action for patent infringement, arising
under the patent laws of the United States, Title 35 of the
United States Code, § 1, et seq. This court has jurisdiction



1 over the subject matter of this action pursuant to Title 28 of
2 the United States Code, §§ 1331 and 1338(a).

3 2. Venue is proper in this judicial district under Title
4 28 of the United States Code, §§ 1391(b), 1391(c), 1391(d) and
5 1400(b).

6 **PARTIES**

7 3. Plaintiff LPL is a corporation organized under the laws
8 of the Republic of Korea having a place of business located in
9 Seoul, Korea.

10 4. Plaintiff LPL is informed and believes, and on that
11 basis alleges that Defendant Envision Peripherals, Inc.
12 ("Envision") is a corporation existing under the laws of the
13 State of California having a place of business located at 47490
14 Seabridge Dr., Fremont, CA 94538.

15 5. LPL is informed and believes, and on that basis
16 alleges, that Defendant TPV Technology, Ltd. ("TPV") is a
17 corporation existing under the laws of Bermuda, having a place of
18 business located in Hong Kong, and is the parent company of
19 Envision.

20 6. LPL is informed and believes, and on that basis
21 alleges, that Envision is responsible for sales of TPV products
22 in the United States, including this district.

23 **LPL'S PATENTS-IN-SUIT**

24 7. LPL is the owner by assignment of all rights, title and
25 interest in and to United States Patent No. 4,624,737 ("the '737
26 patent"), issued on November 25, 1986, entitled "Process for
27 Producing Thin-Film Transistor."
28

1 8. LPL is the owner by assignment of all rights, title and
2 interest in and to United States Patent No. 5,825,449 ("the '449
3 patent"), issued on October 20, 1998, entitled "Liquid Crystal
4 Display Device and Method of Manufacturing the Same."

5 9. LPL is the owner by assignment of all rights, title and
6 interest in and to United States Patent No. 6,373,537 ("the '537
7 patent"), issued on April 16, 2002, entitled "Computer Having
8 Liquid Crystal Display Between Frames Attached at the Edges."

9 10. LPL is the owner by assignment of all rights, title and
10 interest in and to United States Patent No. 6,002,457 ("the '457
11 patent"), issued on December 14, 1999, entitled "Computer Having
12 Liquid Crystal Display."

13 11. LPL is the owner by assignment of all rights, title and
14 interest in and to United States Patent No. 5,926,237 ("the '237
15 patent"), issued on July 20, 1999, entitled "Computer Having
16 Liquid Crystal Display."

17 **DEFENDANTS' INFRINGEMENT OF LPL'S PATENTS**

18 12. LPL is informed and believes, and on that basis
19 alleges, that Chunghwa Picture Tubes, Ltd. ("CPT") manufactures
20 liquid crystal display ("LCD") panels that infringe LPL's patents
21 as set forth in a related case No. CV-02-6775 CBM (JTLx). LPL is
22 informed and believes, and on that basis alleges, that at least
23 TPV incorporates those LCD panels into computer products, such as
24 monitors. LPL is informed and believes, and on that basis
25 alleges, that at least Envision, TPV's sales and distribution
26 subsidiary, imports into and sells in the United States,
27 including within this judicial district, computer products that
28

1 include such CPT LCD panels, including monitors sold under the
2 brand name AOC.

3 13. LPL is informed and believes, and on that basis
4 alleges, that TPV, Envision and CPT are working in concert to
5 import and sell in the United States infringing LCD panels
6 (and/or products with infringing LCD panels incorporated
7 therein).

8 **FIRST CLAIM FOR RELIEF**

9 **(INFRINGEMENT OF THE '737 PATENT)**

10 14. LPL incorporates by this reference paragraphs 1 through
11 13 above, as though fully set forth herein.

12 15. Defendants have infringed and are infringing the '737
13 patent by making, using, selling, offering for sale and/or
14 importing into the United States products manufactured by a
15 process covered by one or more claims of the '737 patent, by
16 actively inducing and encouraging others to do so and/or by
17 contributing to such infringement.

18 16. Defendants have infringed and are infringing the '737
19 patent with knowledge of LPL's patent rights and without a
20 reasonable basis for believing that its conduct is lawful.
21 Defendants' acts of infringement have been willful, deliberate,
22 and in reckless disregard of LPL's patent rights, and will
23 continue unless enjoined by this Court.

24 17. By reason of the foregoing, LPL has been damaged and
25 will continue to sustain damages in an amount to be determined at
26 trial and has suffered and will continue to suffer irreparable
27 loss and injury.

SECOND CLAIM FOR RELIEF

(INFRINGEMENT OF THE '449 PATENT)

18. LPL incorporates by this reference paragraphs 1 through 13 above, as though fully set forth herein.

19. Defendants have infringed and are infringing the '449 patent by making, using, selling, offering for sale and/or importing into the United States products covered by one or more claims of the '449 patent, by making, using, selling, offering for sale and/or importing into the U.S. products manufactured by a process covered by one or more claims of the '449 patent, by actively inducing and encouraging others to do so and/or by contributing to such infringement.

20. Defendants have infringed and are infringing the '449 patent with knowledge of LPL's patent rights and without a reasonable basis for believing that its conduct is lawful. Defendants' acts of infringement have been willful, deliberate, and in reckless disregard of LPL's patent rights, and will continue unless enjoined by this Court.

21. By reason of the foregoing, LPL has been damaged and will continue to sustain damages in an amount to be determined at trial and has suffered and will continue to suffer irreparable loss and injury.

THIRD CLAIM FOR RELIEF

(INFRINGEMENT OF THE '537 PATENT)

22. LPL incorporates by this reference paragraphs 1 through 13 above, as though fully set forth herein.

23. Defendants have infringed and are infringing the '537 patent by making, using, selling, offering for sale and/or

1 importing into the United States products covered by one or more
2 claims of the '537 patent, by actively inducing and encouraging
3 others to do so and/or by contributing to such infringement.

4 24. Defendants have infringed and are infringing the '537
5 patent with knowledge of LPL's patent rights and without a
6 reasonable basis for believing that its conduct is lawful.
7 Defendants' acts of infringement have been willful, deliberate,
8 and in reckless disregard of LPL's patent rights, and will
9 continue unless enjoined by this Court.

10 25. By reason of the foregoing, LPL has been damaged and
11 will continue to sustain damages in an amount to be determined at
12 trial and has suffered and will continue to suffer irreparable
13 loss and injury.

14 **FOURTH CLAIM FOR RELIEF**

15 **(INFRINGEMENT OF THE '457 PATENT)**

16 26. LPL incorporates by this reference paragraphs 1 through
17 13 above, as though fully set forth herein.

18 27. Defendants have infringed and are infringing the '457
19 patent by making, using, selling, offering for sale and/or
20 importing into the United States products covered by one or more
21 claims of the '457 patent, by actively inducing and encouraging
22 others to do so and/or by contributing to such infringement.

23 28. Defendants have infringed and are infringing the '457
24 patent with knowledge of LPL's patent rights and without a
25 reasonable basis for believing that its conduct is lawful.
26 Defendants' acts of infringement have been willful, deliberate,
27 and in reckless disregard of LPL's patent rights, and will
28 continue unless enjoined by this Court.

1 29. By reason of the foregoing, LPL has been damaged and
2 will continue to sustain damages in an amount to be determined at
3 trial and has suffered and will continue to suffer irreparable
4 loss and injury.

5 **FIFTH CLAIM FOR RELIEF**

6 **(INFRINGEMENT OF THE '237 PATENT)**

7 30. LPL incorporates by this reference paragraphs 1 through
8 13 above, as though fully set forth herein.

9 31. Defendants have infringed and are infringing the '237
10 patent by making, using, selling, offering for sale and/or
11 importing into the U.S. products manufactured by a process
12 covered by one or more claims of the '237 patent, by actively
13 inducing and encouraging others to do so and/or by contributing
14 to such infringement.

15 32. Defendants have infringed and are infringing the '237
16 patent with knowledge of LPL's patent rights and without a
17 reasonable basis for believing that its conduct is lawful.
18 Defendants' acts of infringement have been willful, deliberate,
19 and in reckless disregard of LPL's patent rights, and will
20 continue unless enjoined by this Court.

21 33. By reason of the foregoing, LPL has been damaged and
22 will continue to sustain damages in an amount to be determined at
23 trial and has suffered and will continue to suffer irreparable
24 loss and injury.

25 **PRAYER FOR RELIEF**

26 WHEREFORE, Plaintiff LPL prays for relief against Defendants
27 Envision and TPV as follows:
28

1 1. For a judgment that Defendants have infringed LPL's
2 United States Patent Nos. 4,624,737, 5,825,449, 6,373,537,
3 6,002,457, and 5,926,237;

4 2. For preliminary and permanent injunctive relief against
5 Defendants' further infringement of LPL's United States patents;

6 3. For an award of damages for Defendants' infringement of
7 LPL's patents, together with interest, costs and disbursements as
8 fixed by this Court under Title 35 of the United States Code §
9 284;

10 4. For a determination that Defendants' infringement is
11 willful, and an award of trebled damages under Title 35 of the
12 United States Code § 284, for infringement of LPL's patents;

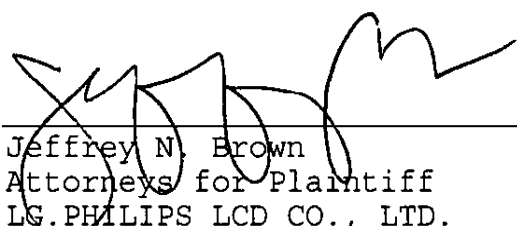
13 5. For a determination that this is an exceptional case
14 within the meaning of Title 35 of the United States Code § 285
15 and an assessment of LPL's reasonable attorneys' fees; and

16 6. For such other and further relief as the Court deems
17 just and proper.

18 Dated: April 24, 2003

MORGAN, LEWIS & BOCKIUS LLP

19
20 By


Jeffrey N. Brown
Attorneys for Plaintiff
LG.PHILIPS LCD CO., LTD.

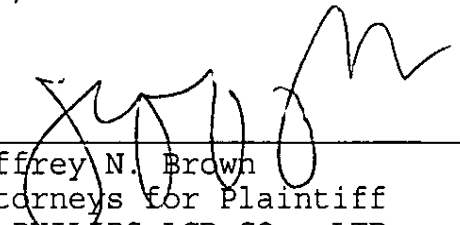
JURY TRIAL DEMAND

Plaintiff LG.Philips LCD Co., Ltd. hereby demands a trial by jury on all issues properly triable by jury.

Dated: April 24, 2003

MORGAN, LEWIS & BOCKIUS LLP

By


Jeffrey N. Brown
Attorneys for Plaintiff
LG.PHILIPS LCD CO., LTD.