

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ROTATABLE TECHNOLOGIES LLC,

Plaintiff,

v.

- 1. HTC AMERICA, INC.,**
- 2. COBY ELECTRONICS CORP.,**
- 3. LG ELECTRONICS
MOBILECOMM U.S.A., INC.,**
- 4. LENOVO (UNITED STATES) INC.,**
- 5. PANDIGITAL, INC.,**
- 6. VIEWSONIC CORPORATION,**
- 7. VIZIO, INC.,**

Defendants.

CIVIL ACTION NO. 2:12-cv-718

JURY TRIAL DEMANDED

PLAINTIFF'S ORIGINAL COMPLAINT

This is an action for patent infringement in which Rotatable Technologies LLC ("Rotatable Technologies") makes the following allegations against HTC America, Inc., Coby Electronics Corp., LG Electronics MobileComm U.S.A., Inc., Lenovo (United States) Inc., Pandigital, Inc., Viewsonic Corporation, Vizio, Inc. (collectively, "Defendants"):

PARTIES

1. Rotatable Technologies is a limited liability company formed under the laws of the State of Texas with a principle place of business located at 815 Brazos Street, Suite 500, Austin, Texas 78701.

2. Defendant HTC America, Inc. ("HTC") is a corporation organized and existing under the laws of the state of Washington, with its principle place of business located at 811 First Ave., Ste. 530, Seattle, Washington 92606. HTC can be served via its registered agent for

service of process: National Registered Agents Inc., 1780 Barnes Blvd. SW, Tumwater, Washington 98512.

3. Defendant Coby Electronics Corp. (“Coby”) is a corporation organized and existing under the laws of the State of New York with a principle place of business located at 1991 Marcus Ave., Suite 301, Lake Success, New York 11042. On information and belief, Coby may be served via officer or director at the same address above.

4. Defendant LG Electronics MobileComm U.S.A., Inc. (“LG”) is a corporation organized and existing under the laws of the State of California, with a principle place of business located at 920 Sylvan Ave., Englewood Cliffs, New Jersey 07632. LG can be served via its registered agent for service of process: National Registered Agents, Inc., 2875 Michelle Dr., Ste. 100, Irvine, California 92606.

5. Defendant Lenovo (United States) Inc. (“Lenovo”) is a corporation organized and existing under the laws of the State of Delaware with a principle place of business located at 1009 Think Place, Morrisville, North Carolina 27560. Lenovo can be served via its registered agent for service of process: The Corporation Trust Company, Corporation Trust Center 1209 Orange St., Wilmington, Delaware 19801.

6. Defendant Pandigital, Inc. (“Pandigital”) is a corporation organized and existing under the laws of the State of Delaware with a principle place of business located at 6375 Clark Ave., Ste. 100, Dublin, California 94568. Pandigital can be served via its registered agent for service of process: Capitol Services, Inc., 1675 S. State St., Ste. B, Dover, Delaware 19901.

7. Defendant Viewsonic Corporation (“Viewsonic”) is a corporation organized and existing under the laws of the State of Delaware with a principal place of business located at 381 Brea Canyon Rd., Walnut, California 91789. Viewsonic can be served via its registered agent

for service of process: The Corporation Trust Company, Corporation Trust Center 1209 Orange Street, Wilmington, Delaware 19801.

8. Defendant Vizio, Inc. (“Vizio”) is a corporation organized and existing under the laws of the State of California with a principal place of business located at 39 Tesla, Irvine, California 92618. Vizio can be served via its registered agent for service of process: C T Corporation System, 818 W. Seventh St., Los Angeles, California 90017.

JURISDICTION AND VENUE

9. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284 - 85, among others. This Court has subject matter jurisdiction over this action under 28 U.S.C. §1331 and §1338(a).

10. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400(b). Upon information and belief, each Defendant has transacted business in this district, and has committed and/or induced acts of patent infringement in this district.

11. Defendants are subject to this Court’s specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to each Defendant’s substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this district.

12. Joinder of the Defendants is proper pursuant to 35 U.S.C. § 299(a) at least because each Defendant’s infringing products includes, complies with, and/or utilizes the android operating system, the practice of which by each Defendant necessarily results in infringement of the patent-in-suit. In addition, questions of fact common to all of the Defendants will arise in the action at least because, upon information and belief, Defendants’ infringing acts

arise from their common acts of including, complying with and/or utilizing the android operating system.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 6,326,978

13. On December 4, 2001, United States Patent No. 6,326,978 (the “’978 patent”) was duly and legally issued by the United States Patent and Trademark Office for an invention entitled “Display Method for Selectively Rotating Windows on a Computer Display”. A true and correct copy of the ’978 patent is attached hereto as Exhibit A.

14. Rotatable Technologies is the owner of the ’978 patent with all substantive rights in and to that patent, including the sole and exclusive right to prosecute this action and enforce the ’978 patent against infringers, and to collect damages for all relevant times.

15. HTC directly or through intermediaries, made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or systems (including at least its HTC One X and other Android phones) that infringed one or more claims of the ’978 patent.

16. Coby directly or through intermediaries, made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or systems (including at least its Coby MID9742 and other Android tablets) that infringed one or more claims of the ’978 patent.

17. LG directly or through intermediaries, made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or systems (including at least its LG Thrill P925 and other Android phones) that infringed one or more claims of the ’978 patent.

18. Lenovo directly or through intermediaries, made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or systems (including

at least its IdeaPad A2109 and other Android tablets) that infringed one or more claims of the '978 patent.

19. Pandigital directly or through intermediaries, made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or systems (including at least its Pandigital Novel and other Android tablets) that infringed one or more claims of the '978 patent.

20. ViewSonic directly or through intermediaries, made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or systems (including at least its ViewPad 7 and other Android tablets) that infringed one or more claims of the '978 patent.

21. Vizio directly or through intermediaries, made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or systems (including at least its VTAB1008 and other Android tablets) that infringed one or more claims of the '978 patent.

JURY DEMAND

Rotatable Technologies hereby requests a trial by jury on all issues so triable by right.

PRAYER FOR RELIEF

Rotatable Technologies requests that the Court find in its favor and against Defendants, and that the Court grant Rotatable Technologies the following relief:

a. Judgment that one or more claims of the '978 patent have been infringed, either literally and/or under the doctrine of equivalents, by Defendants;

b. A permanent injunction enjoining Defendants and their officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement of the '978 patent;

c. Judgment that Defendants account for and pay to Rotatable Technologies all damages and costs incurred by Rotatable Technologies, caused by Defendants' infringing activities and other conduct complained of herein;

d. That Rotatable Technologies be granted pre-judgment and post-judgment interest on the damages caused by Defendants' infringing activities and other conduct complained of herein;

e. That this Court declare this an exceptional case and award Rotatable Technologies reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and

f. That Rotatable Technologies be granted such other and further relief as the Court may deem just and proper under the circumstances.

DATED: November 13, 2012.

Respectfully submitted,

By: \s\ Hao Ni

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