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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

LOS ANGELES DIVISION

NEWTHINK, LLC, Plaintiff, v. LENEVO, INC., Defendant.	Case No. CV 12-5443 GHK (JCx) **COMPLAINT FOR PATENT INFRINGEMENT** **Jury Trial Demanded**

BY FAX

PLAINTIFF'S ORIGINAL COMPLAINT

Plaintiff Joao Newthink, LLC ("Plaintiff"), by and through its undersigned counsel, files this Original Complaint against Lenovo, Inc. ("Defendant" or "Lenovo") as follows:

NATURE OF THE ACTION

1. This is a patent infringement action to stop Defendant's infringement of Plaintiff's United States Patent No. 6,630,939 entitled "*Portable, Read-Only Electronic Display Unit*" (hereinafter, the "'949 patent"; a copy of which is attached hereto as Exhibit A). Plaintiff is the owner of the '939 patent. Plaintiff seeks injunctive relief and monetary damages.

PARTIES

2. Plaintiff is a limited liability company organized and existing under the laws of the state of Florida. Plaintiff maintains its principal place of business at 20 Island Avenue, Suite 911, Miami, Florida 33139. Plaintiff is the owner of the patent-in-suit and possesses the right to sue for infringement and recover past damages.

3. Upon information and belief, Defendant is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business located at 1009 Think Place, Morrisville, North Carolina 27560.

JURISDICTION AND VENUE

4. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*, including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This Court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

5. The Court has personal jurisdiction over Defendant because: Defendant is present within or has minimum contacts with the State of California and the Central District of California; Defendant has purposefully availed itself of

the privileges of conducting business in the State of California and in the Central District of California; Defendant has sought protection and benefit from the laws of the State of California; Defendant regularly conducts business within the State of California and within the Central District of California; and Plaintiff's causes of action arise directly from Defendant's business contacts and other activities in the State of California and in the Central District of California.

6. More specifically, Defendant, directly and/or through authorized intermediaries, ships, distributes, offers for sale, sells, and/or advertises (including the provision of an interactive web page) its products and services in the United States, the State of California, and the Central District of California. Upon information and belief, Defendant has committed patent infringement in the State of California and in the Central District of California. Defendant solicits customers in the State of California and in the Central District of California. Defendant has many paying customers who are residents of the State of California and the Central District of California and who each use Defendant's products and services in the State of California and in the Central District of California.

7. Venue is proper in the Central District of California pursuant to 28 U.S.C. §§ 1391 and 1400(b).

COUNT I – PATENT INFRINGEMENT

8. The '939 Patent was duly and legally issued by the United States Patent and Trademark Office on October 7, 2003, after full and fair examination for thin, flat, self-contained electronic display units. Plaintiff is the owner of the '939 Patent and possesses all substantive rights and rights of recovery under the '939 Patent, including the right to sue for infringement and recover past damages.

9. Plaintiff is informed and believes that Lenovo makes, uses, sells, distributes and otherwise provides thin, flat, self-contained display units including, but not limited to, the "ThinkPad" tablet ("the Lenovo Devices") and associated

hardware and software. Upon information and belief, Lenovo has infringed and continues to infringe one or more claims of the ’939 Patent by making, using, providing, offering to sell, and selling (directly or through intermediaries), in this district and elsewhere in the United States, thin, flat, self-contained display units, including the Lenovo Devices. Lenovo has further willfully infringed the ’939 patent, as Lenovo has been aware of the patents-in-suit since at least April 16, 2012, which is the date Plaintiff notified Lenovo of the ’939 patent and the accused product identified above.

10. Defendant’s aforesaid activities have been without authority and/or license from Plaintiff.

11. Plaintiff is entitled to recover from the Defendant the damages sustained by Plaintiff as a result of the Defendant’s wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

12. Defendant’s infringement of Plaintiff’s exclusive rights under the ’939 patent will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

JURY DEMAND

13. Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

A. An adjudication that one or more claims of the ’939 Patent have been infringed, either literally and/or under the doctrine of equivalents, by the Defendant and that such infringement was willful;

B. An award to Plaintiff of damages adequate to compensate Plaintiff for the Defendant' acts of infringement together with pre-judgment and post-judgment interest;

C. A grant of permanent injunction pursuant to 35 U.S.C. § 283, enjoining the Defendant from further acts of (1) infringement, (2) contributory infringement, and (3) actively inducing infringement with respect to the claims of the '939 Patent;

D. That this Court declare this to be an exceptional case and award Plaintiff its reasonable attorneys' fees and costs in accordance with 35 U.S.C. §285; and

E. Any further relief that this Court deems just and proper.

Respectfully submitted,
WHITE FIELD, INC.

Dated: June 22, 2012

Steven W. Ritcheson,
Attorney for Plaintiff
NEWTHINK, LLC