

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

TECHNOLOGY INNOVATIONS  
ASSOCIATES LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD,  
SAMSUNG ELECTRONICS AMERICA,  
INC. and SAMSUNG  
TELECOMMUNICATIONS AMERICA LLC

Defendants.

C.A. No. \_\_\_\_\_

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff Technology Innovations Associates, LLC (“Technology Innovations”) alleges the following for its complaint against Defendants Samsung Electronics Co. Ltd, Samsung Electronics America, Inc. and Samsung Telecommunications America LLC (collectively, “Samsung”).

**THE PARTIES**

1. Plaintiff Technology Innovations is a limited liability company formed under the laws of the state of Delaware having its principal place of business at 21301 S. Tamiami Trail, #320 MS 337, Estero, FL 33928.

2. Defendant Samsung Electronics Co. Ltd (“SEC”) is a Korean corporation with its principal office at 416 Maetan-3dong, Yeoungtong Gu, Suwon City, Gyeonggi, Korea 443-742. On information and belief, Defendant SEC conducts business in the United States generally and in this District through its subsidiaries, including the other named Defendants.

3. Defendant Samsung Electronics America, Inc. is a corporation organized under the laws of the state of New York with a principal place of business at 85 Challenger Road, Ridgefield Park, New Jersey 07660. Defendant Samsung Electronics America, Inc. may be served with process via its registered agent CT Corporation System, 111 Eighth Avenue, New York, NY 10011.

4. Defendant Samsung Telecommunications America LLC is a limited liability company formed under the laws of the state of Delaware with a principal place of business at 1301 East Lookout Drive, Richardson, Texas 75082. Defendant Samsung Telecommunications America LLC may be served with process via its registered agent, Corporation Service Company 2711 Centerville Road, Suite 400, Wilmington, DE 19808.

### **JURISDICTION AND VENUE**

5. This is a patent infringement action. The Court has subject matter jurisdiction pursuant to 28 U.S.C. §§1331 and 1338.

6. The Court has personal jurisdiction over Defendants under the Delaware long arm statute as they have availed themselves of the rights and benefits of this District by conducting business in this jurisdiction, including by having their products in at least one physical location within this District. Defendants also conduct business in this District by promoting products for sale via the internet, which are accessible to and accessed by residents of this District. Defendant Samsung Telecommunications America LLC is additionally subject to personal jurisdiction, because it is incorporated in this State.

7. Venue is proper in this District pursuant to 28 U.S.C. §§1391(b)-(c) and §1400(b), because Defendants reside in this District and substantial acts of infringement have occurred in this District.

**COUNT ONE**  
**INFRINGEMENT OF U.S. PATENT NO. 7,840,619**

8. On November 23, 2010, U.S. Patent No. 7,840,619 (the “’619 Patent”) entitled “Computer System for Automatic Organization, Indexing and Viewing of Information From Multiple Sources” was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the ’619 Patent is attached as Exhibit A hereto.

9. Plaintiff Technology Innovations is the sole and exclusive licensee of the ’619 Patent and holds the exclusive right to take all actions, including the filing of this patent infringement lawsuit, necessary to enforce its rights to the ’619 Patent. Technology Innovations also has the right to recover all damages for past, present, and future infringement of the ’619 Patent and to seek injunctive relief as appropriate under the law.

10. Defendants have infringed and continue to directly infringe the ’619 Patent by manufacturing, selling, offering for sale, and/or importing products running the Android operating system that come with pre-installed applications including, for example, at least one of Gmail, Contacts, and Calendar, that utilize a hierarchical data viewing system or group structure that enables a user to more easily remain oriented to the level of a list he/she is viewing while scrolling through items in that list. Accused products include at least the following smart phones, tablets, and/or devices: Galaxy Note II, Galaxy S III, Galaxy Discover, Galaxy Axiom, Galaxy Express, Galaxy S II 4G, Galaxy Stratosphere II, Galaxy Rugby Pro, Nexus Android Smartphone, Galaxy Reverb, Galaxy Rush, Galaxy Stellar, Galaxy Metrix 4G, Galaxy Victory 4G LTE, Galaxy S Relay 4G, Rugby Smart, Galaxy S Lightray, Galaxy Appeal, Galaxy Exhilarate, Galaxy S Aviator, Galaxy S Blaze 4G, Galaxy Proclaim, Galaxy Replenish, Repp, Galaxy S II Skyrocket, Stratosphere Galaxy S, Galaxy Attain 4G, DoubleTime, Galaxy Exhibit 4G, Transfix, Droid Charge, Nexus S from Google, Nexus S 4G, T-Mobile Sidekick 4G,

Vitality, Galaxy Precedent, Captivate Glide, Gem, Admire, Conquer 4G, Dart, Indulge, Illusion, Transform Ultra, Gem Touchscreen, Acclaim, Galaxy Tab 2 10.1, Nexus 10, Galaxy Prevail, Gravity SMART QWERTY, Replenish, Galaxy Tab 7.0, Galaxy Tab 7.0 Plus, Galaxy Tab 7.7, Galaxy Tab 2 7.0 and Galaxy Note 10.1. Such products are covered by one or more claims of the '619 Patent, including but not limited to Claim 1. Defendants' acts of manufacturing, selling, offering to sell, and/or importing the products, either directly or through their subsidiaries, into the United States are without the permission of Technology Innovations and constitute infringement under 35 U.S.C. §271 for which Samsung is liable.

11. Defendants have infringed and continue to directly infringe the '619 Patent by manufacturing, selling, offering for sale, and/or importing products running the Windows Phone operating system that come with pre-installed applications including, for example, at least one of Calendar and People, that utilize a hierarchical data viewing system or group structure that enables a user to more easily remain oriented to the level of a list he/she is viewing while scrolling through items in that list. Accused products include at least the following smart phones, tablets, and/or devices: ATIV Odyssey, Focus 2, Focus S and Focus Flash. Such products are covered by one or more claims of the '619 Patent, including but not limited to Claim 1.

12. As a result of Samsung's infringement, Plaintiff Technology Innovations has been damaged monetarily and is entitled to adequate compensation of no less than a reasonable royalty pursuant to 35 U.S.C. § 284.

**COUNT TWO**  
**INFRINGEMENT OF U.S. PATENT NO. 8,280,932**

13. On October 2, 2012, U.S. Patent No. 8,280,932 (the “’932 Patent”) entitled “Computer System for Automatic Organization, Indexing and Viewing Multiple Objects From Multiple Sources” was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the ’932 Patent is attached as Exhibit B hereto.

14. Plaintiff Technology Innovations is the sole and exclusive licensee of the ’932 Patent and holds the exclusive right to take all actions, including the filing of this patent infringement lawsuit, necessary to enforce its rights to the ’932 Patent. Technology Innovations also has the right to recover all damages for past, present, and future infringement of the ’932 Patent and to seek injunctive relief as appropriate under the law.

15. Defendants have infringed and continue to directly infringe the ’932 Patent by manufacturing, selling, offering for sale, and/or importing products running the Android operating system that come with pre-installed applications including, for example, at least one of Gmail, Contacts, and Calendar, that utilize a hierarchical data viewing system or group structure that enables a user to more easily remain oriented to the level of a list he/she is viewing while scrolling through items in that list. Accused products include at least the following smart phones, tablets, and/or devices: Galaxy Note II, Galaxy S III, Galaxy Discover, Galaxy Axiom, Galaxy Express, Galaxy S II 4G, Galaxy Stratosphere II, Galaxy Rugby Pro, Nexus Android Smartphone, Galaxy Reverb, Galaxy Rush, Galaxy Stellar, Galaxy Metrix 4G, Galaxy Victory 4G LTE, Galaxy S Relay 4G, Rugby Smart, Galaxy S Lightray, Galaxy Appeal, Galaxy Exhilarate, Galaxy S Aviator, Galaxy S Blaze 4G, Galaxy Proclaim, Galaxy Replenish, Repp, Galaxy S II Skyrocket, Stratosphere Galaxy S, Galaxy Attain 4G, DoubleTime, Galaxy Exhibit 4G, Transfix, Droid Charge, Nexus S from Google, Nexus S 4G, T-Mobile Sidekick 4G,

Vitality, Galaxy Precedent, Captivate Glide, Gem, Admire, Conquer 4G, Dart, Indulge, Illusion, Transform Ultra, Gem Touchscreen, Acclaim, Galaxy Tab 2 10.1, Nexus 10, Galaxy Prevail, Gravity SMART QWERTY, Replenish, Galaxy Tab 7.0, Galaxy Tab 7.0 Plus, Galaxy Tab 7.7, Galaxy Tab 2 7.0 and Galaxy Note 10.1. Such products are covered by one or more claims of the '932 Patent, including but not limited to Claim 1.

16. Defendants have infringed and continue to directly infringe the '932 Patent by manufacturing, selling, offering for sale, and/or importing products running the Windows Phone operating system that come with pre-installed applications including, for example, at least one of Calendar and People, that utilize a hierarchical data viewing system or group structure that enables a user to more easily remain oriented to the level of a list he/she is viewing while scrolling through items in that list. Accused products include at least the following smart phones, tablets, and/or devices: ATIV Odyssey, Focus 2, Focus S and Focus Flash. Such products are covered by one or more claims of the '932 Patent, including but not limited to Claim 1.

17. Defendants' acts of manufacturing, selling, offering to sell, and/or importing the products, either directly or through their subsidiaries, into the United States are without the permission of Technology Innovations and constitute infringement under 35 U.S.C. §271 for which Samsung is liable.

18. As a result of Samsung's infringement, Plaintiff Technology Innovations has been damaged monetarily and is entitled to adequate compensation of no less than a reasonable royalty pursuant to 35 U.S.C. § 284.

#### **JURY DEMAND**

Plaintiff requests a jury on all issues so triable.

## **PRAYER**

WHEREFORE, Plaintiff respectfully requests that the Court:

- Enter judgment that Samsung has infringed, either literally or by equivalents, the '619 Patent and the '932 Patent;
- Award Plaintiff damages for Samsung's infringement in an amount to be determined at trial, including enhanced damages, costs, and pre and post-judgment interest; and
- Award any other relief deemed just and proper.

March 4, 2013

BAYARD, P.A.

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