



## **JURISDICTION AND VENUE**

4. This patent infringement action arises under the patent laws of the United States, including 35 U.S.C. §§ 271, et seq.

5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § § 1331 and 1338(a) because it arises under United States Patent law.

6. This Court has personal jurisdiction over the Defendant because it (either directly or through its subsidiaries, divisions, groups or distributors) has sufficient minimum contacts with the forum as a result of business conducted within the State of Texas and this district; and/or specifically over the Defendant (either directly or through its subsidiaries, divisions, groups or distributors) because of its infringing conduct within or directed at the State of Texas and this district.

7. Venue is proper in this district pursuant to 28 U.S.C. §1391(c) and 1400(b) because Defendant is deemed to reside in this district. In addition, at a minimum, Defendant is subject to this Court's personal jurisdiction in that the acts and transactions including the sale of consumer electronic products, which incorporate the technology covered by the patents identified herein through the State of Texas and this district.

## **FACTS**

8. Plaintiff is the owner, by assignment, of U.S. Patent No. 6,079,854 ("the '854 Patent"), entitled "Device and Method for Diffusing Light," which was duly and legally issued on June 27, 2000 by the United States Patent and Trademark Office ("USPTO").

9. A copy of the '854 Patent is attached to this Complaint as Exhibit A.

10. The claims of the '854 Patent are valid and enforceable.

**COUNT I: CLAIM FOR PATENT INFRINGEMENT**  
**UNDER 35 U.S.C. § 271(a) ('307 PATENT)**  
**(AGAINST DEFENDANT)**

11. Plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 10 of this Complaint as if fully set forth herein.

12. Defendant makes, has made, sells, offer for sale, uses and/or imports into the United States, motor vehicles that include LED headlamps, including without limitation the Jewel Eye® LED Headlights sold by Defendant in its Acura® RLX brand automotive line beginning in 2014 (“Accused Product(s)”).

13. Each of the Accused Product(s) uses a method of diffusing light, including providing a light source from which light radiates. See Exhibit B.

14. Each of the Accused Products interrupts the light with a substantially transparent member, including the at least “eight LEDs that” are diffused “through 16 lenses” to “focus the LED beam over a longer and wider surface area.” See Exhibit B.

15. Each of the Accused Products segregate a substantial portion of the light to a plurality of channels within the member, including the at least “eight LEDs that” are diffused “through 16 lenses” to “focus the LED beam over a longer and wider surface area.” See Exhibit B.

16. Each of the Accused Products disperses the light transmitted in a widening ray along the plurality of channels, including the at least “eight LEDs that” are diffused “through 16 lenses” to “focus the LED beam over a longer and wider surface area.” See Exhibit B.

17. Each of the Accused Products also radiates a diffused pattern of light emitted from the plurality of channels based on the at least “eight LEDs that” are diffused “through 16 lenses” to “focus the LED beam over a longer and wider surface area.” See Exhibit B.

18. Each one of the elements of the Accused Product(s), itemized in paragraphs 13-17 above, is an element in Claim 27 of the ‘854 patent.



**DEMAND FOR TRIAL BY JURY**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands a jury trial on all issues and causes of action triable to a jury.

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Respectfully submitted,

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