

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

POLARIS POWERLED TECHNOLOGIES, §
LLC, §

Plaintiff, §

v. §

SAMSUNG ELECTRONICS AMERICA, §
INC. and SAMSUNG ELECTRONICS CO., §
LTD., §

Defendants. §
§

Civil Action No. 2:24-cv-00966

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Polaris PowerLED Technologies, LLC (“Polaris PowerLED”) brings this patent infringement action against Defendants Samsung Electronics America, Inc. (“SEA”) and Samsung Electronics Co., Ltd. (“SEC”) (collectively “Samsung” or “Defendants”) based on information and belief, as follows:

NATURE OF THE ACTION

1. This is a civil action for infringement of U.S. Patent No. US 8,314,572 (“the ’572 patent”) under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*

2. Polaris PowerLED brings this patent infringement action to protect its valuable patented technology relating to devices and methods of controlling the supply of power to the light-emitting diodes in the backlights of electronic displays, a significant advance in the field of electronic display technology for devices such as televisions.

THE PARTIES

3. Polaris PowerLED is a California limited liability company having its address at 5150 East Pacific Coast Highway, Suite 200, Long Beach, California 90804.

4. Defendant SEA is a New York corporation with its principal place of business located at 85 Challenger Road, Ridgefield Park, New Jersey 07660. SEA's registered agent is the CT Corporation System located at 28 Liberty St., New York, NY 100005.

5. Defendant SEC is a corporation organized and existing under the laws of the Republic of Korea with its principal place of business at 129 Samsung-ro, Maetan-3dong, Yeongton-gu, Suwon-si, Gyeonggi-do, 443-742, Republic of Korea. SEC may be served via its domestic entities or by process under the Hague convention.

6. The claims of the '572 patent are infringed by various Samsung electronics products, including most if not all of its LCD televisions, monitors, and phones offered for sale in the United States (collectively, "Accused Products"), including for example the Samsung QN50Q80AAFXZA television. Defendants SEA and SEC are related entities that work in concert to design, manufacture, import, distribute, offer to sell, and sell these infringing devices.

JURISDICTION AND VENUE

7. This action arises under the patent laws of the United States, Title 35 of the United States Code. Accordingly, this Court has subject matter jurisdiction under 28 U.S.C. §§1331 and 1338(a) and the patent laws of the United States, 35 U.S.C. § 1, *et seq.*

8. The Court has personal jurisdiction over Defendants consistent with the Texas Long Arm Statute. This Court has personal jurisdiction over Defendants in this action because, among other reasons, Defendants have committed infringing acts within the Eastern District of Texas giving rise to this action and have established minimum contacts with the forum state of Texas.

Defendants conduct business in this District and maintain a regular and established place of business within this District.

9. This Court has personal jurisdiction over Defendants because Defendants have committed and continue to commit acts of infringement in violation of 35 U.S.C. § 271 and place infringing products into the stream of commerce, with the knowledge or understanding that such products are sold in the State of Texas, including in this District. Samsung has purposefully availed itself of the privileges of conducting business in the State of Texas; Samsung regularly conducts business within the State of Texas, including at least by virtue of Samsung's infringing methods and apparatuses, which are, or were at least made, used, sold, and/or offered for sale in, the State of Texas. Further, this Court has general jurisdiction over Samsung, including due to its continuous and systematic contacts with the State of Texas. Further, on information and belief, Samsung is subject to the Court's jurisdiction, including because Samsung has committed patent infringement in the State of Texas.

10. Samsung's U.S. business operations concerning televisions are conducted at its facilities located in Plano, Texas. Additionally, Samsung has committed infringing activities by marketing, selling, distributing, and servicing the Accused Products.

11. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b). Defendant SEA maintains regular and established places of business, and a permanent and continuous physical presence within the District, including an office located at 6625 Excellence Way, Plano, TX 75023.

12. Defendants also employ full-time personnel, such as engineers and senior managers in this District, including in Plano, Texas. On information and belief, Samsung's U.S. business operations relating to televisions are conducted primarily at its facilities located in Plano, Texas.

13. Defendant SEA has also committed acts of infringement in this District by commercializing, marketing, selling, distributing, and servicing certain Samsung-branded devices, including but not limited to smart phones and televisions, which are devices Plaintiff accuses of infringement in this Action.

14. Because this Court has personal jurisdiction over SEC, a foreign corporation, venue is proper pursuant to § 1391(c).

15. Further, on information and belief, Samsung is subject to the venue in this District, including because Samsung has committed patent infringement in this District. Pursuant to 35 U.S.C. § 271, Samsung infringes the patents-in-suit by the infringing acts described herein in this District. Further, Samsung solicits and induces residents of this District to purchase and use the Accused Products in this District, including via its website at www.samsung.com.

THE '572 PATENT

16. Polaris PowerLED owns the entire right, title, and interest in U.S. Patent No. 8,314,572 titled “Apparatus and Methodology for Enhancing Efficiency of a Power Distribution System Having Power Factor Correction Capability by Using a Self-Calibrating Controller.” The '572 patent issued on November 20, 2012 to inventors Matthew Schindler, Tushar Dhayagude, Hendrik Santo, and Dilip Sangam from the U.S. Patent Application No. 12/409,088, filed on March 23, 2009. A true and correct copy of the '572 patent is attached as Exhibit A to this Complaint.

17. Backlights are used to illuminate liquid crystal displays (“LCDs”). LCDs with backlights are used in small displays for cell phones and personal digital assistants, as well as in large displays for computer monitors and televisions. LEDs have become the prevalent light source in backlight technology. In some displays, one or more strings of LEDs are required to provide adequate backlight for the LCD display.

18. As the current in the LED increases, the intensity of the light produced by the LED increases. The current in the LEDs must be sufficiently high to meet the desired brightness requirement. The drive current of the LED string is a function of the drive voltage applied to the LED string. In conventional displays, the drive voltage for the LED strings is fixed at a higher level than necessary, often with a large margin referred to as headroom, to ensure the operation of the LED strings under poor conditions and to account for the variations in the LEDs made by various manufacturers. This fixed voltage results in wasted power.

19. Matthew Schindler, Tushar Dhayagude, Hendrik Santo, and Dilip Sangam invented a novel display technology for adaptively controlling the drive voltage applied to LED strings in backlights. Their invention represented a significant advance in improving the efficiency of LCD displays, such as televisions, and by reducing the number of components required in display systems. The inventive technology allows for the adjustment of drive voltages to accommodate any physical, electrical, or ambient change to the LED strings in LCD displays.

COUNT I

Infringement of the '572 Patent

20. Polaris PowerLED incorporates by reference and re-alleges the preceding paragraphs as if fully incorporated herein.

21. Samsung has directly infringed and continues to infringe one or more claims of the '572 patent, literally and/or under the doctrine of equivalents, under 35 U.S.C. § 271(a) *et seq.* by or through making, using, selling, or offering for sale within the U.S., or importing into the U.S. the Accused Products.

22. Exhibit B is an exemplary claim chart, demonstrating on an element-by-element basis, how Samsung's QN50Q80AAFXZA television infringes claim 1 of the '572 patent.

23. Samsung has indirectly infringed and continues to indirectly infringe at least claim 1 of the '572 patent in violation of 35 U.S.C. § 271(b). From at least the time Samsung received notice of the '572 patent, Samsung has induced others to infringe at least claim 1 of the '572 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to purchasers of Samsung's Accused Products (for example, customers, retail purchasers, distributors, wholesalers, and retailers), whose use, sales, and/or offers for sale of the Accused Products constitutes direct infringement of at least claim 1 of the '572 patent under 35 U.S.C. § 271(a). Samsung intentionally instructs its customers to infringe through support information, the Samsung automated Virtual Assistant, demonstrations, brochures, videos, and user guides, such as those located at: <https://www.samsung.com/us/support/>;
<https://www.samsung.com/us/support/remoteservice/>;
<https://www.youtube.com/user/samsungpstv>;
https://www.youtube.com/watch?v=qG5_RMQP6XI;
<https://www.youtube.com/channel/UCnEdfCdbxJJ9ouWKLSRCRRw>; and
https://www.youtube.com/channel/UCWwgaK7x0_FR1goeSRazfsQ.

24. Samsung aids, instructs, or otherwise acts with the intent to cause purchasers of Samsung's Accused Products to perform acts of direct infringement by, for example, providing retail purchasers with instructions and intuitive controls for operating the Accused Products, which results in infringement of the '572 patent. As another example, Samsung intends for distributors, wholesalers, and retailers of the Accused Products to sell the Accused Products in the United States, which also results in infringement of the '572 patent.

25. Samsung has been aware of Polaris PowerLED's patent portfolio, which includes the '572 patent, for years prior to this lawsuit. Samsung has had knowledge of the '572 patent, at least as early as it learned of Polaris' patent portfolio, including before and as of the date of filing this Complaint and likely longer. Alternatively, Samsung has shown willful blindness to the existence of the '572 and to the risk of infringement by purchasers of the Accused Products.

26. Samsung knew and knows that purchasers of its Accused Products would directly infringe at least claim 1 of the '572 patent when those purchasers use and/or sell the Accused Products in the United States. Despite its knowledge of the '572 patent, Samsung continues to make the Accused Products available to purchasers of the Accused Products, specifically intending for and inducing those purchasers to infringe the '572 patent.

27. Samsung also indirectly infringed and continues to indirectly infringe at least claim 1 of the '572 patent in violation of 35 U.S.C. § 271(c). From at least the time Samsung received notice of the '572 patent, Samsung has sold or offered to sell TVs containing a circuit that specifically embodies the patented features for controlling LED strings. This circuit (1) constitutes a material part of the patented invention; (2) has no substantial non-infringing uses, as its design purpose is to manage LED functionality as described in the claims; and (3) was provided with knowledge of its role in enabling the claimed LED control method. Thus, Samsung contributes to infringement by providing this essential, infringing component within its products.

28. In addition, Samsung's infringement of the '572 patent is willful. Samsung has had notice of the '572 patent and its infringement of it. Nevertheless, without authorization, Samsung deliberately continues to infringe the '572 patent and also encourages others to infringe the '572 patent by using, selling, and/or offering to sell the Accused Products in the United States.

PRAYER FOR RELIEF

WHEREFORE, Polaris PowerLED requests the following relief from this Court:

- (A) A judgment that each defendant is liable for infringement and willful infringement of one or more claims of the '572 patent;
- (B) Compensatory damages in an amount according to proof, and in any event no less than a reasonable royalty, including all pre-judgment and post-judgment interest at the maximum rate allowed by law;
- (C) Enhanced damages pursuant to 35 U.S.C. § 284;
- (D) An award of Polaris PowerLED's attorneys' fees pursuant to 35 U.S.C. § 285 or as otherwise permitted by law; and
- (E) A judgment granting Polaris PowerLED such further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Polaris PowerLED demands a trial by jury for all issues so triable.

Dated: November 22, 2024

By: /s/ Deron R. Dacus

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on this 22nd day of November, 2024.

By: */s/ Deron R. Dacus*

Deron R. Dacus