FILED
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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA
BY

John J. Edmonds (State Bar No. 274200)
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Attorney for Plaintiff,
DIGITECH IMAGE TECHNOLOGIES, LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

DIGITECH IMAGE TECHNOLOGIES, LLC, Plaintiff, v. LG ELECTRONICS USA, INC., LG ELECTRONICS, INC. and LG ELECTRONICS MOBILECOMM U.S.A., INC. Defendants.	**CASE NO.** **SACV13 - 00134 JST (JPRx)** **ORIGINAL COMPLAINT FOR INFRINGEMENT OF U.S. PATENT NO. 6,128,415** **DEMAND FOR JURY TRIAL** Complaint Filed: January 28, 2013

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

This is an action for patent infringement in which DIGITECH IMAGE TECHNOLOGIES, LLC submits this Original Complaint against the Defendants named herein, namely LG ELECTRONICS USA, INC., LG ELECTRONICS, INC.

COPY

and LG ELECTRONICS MOBILECOMM U.S.A., INC. (collectively "Defendants" or "LG"), as follows:

THE PARTIES

1. DIGITECH IMAGE TECHNOLOGIES, LLC ("DIGITECH" or "Plaintiff") is a California limited liability company with a place of business at 500 Newport Center Drive, Suite 700, Newport Beach, CA 92660.

2. On information and belief, LG ELECTRONICS USA, INC. is a Delaware corporation with a place of business at Englewood Cliffs, NJ. On information and belief, LG ELECTRONICS, INC.is a foreign company with a place of business at Seoul, South Korea. On information and belief, LG ELECTRONICS MOBILECOMM U.S.A., INC. is a California corporation with a place of business at Englewood Cliffs, NJ.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, LG is subject to this Court's specific and/or general personal jurisdiction, pursuant to due process and/or the California Long Arm Statute, due at least to its substantial business in California, including related to the infringements alleged herein. Further, on information and belief, LG has, within this

forum, engaged in at least the selling of the accused products listed herein. In addition, LG induces infringement of the patent-in-suit by sellers and/or infringing users located in this forum. Further, on information and belief, LG has interactive websites which are used in and/or accessible in this forum. Further, on information and belief, LG regularly conducts and/or solicits business, engages in other persistent courses of conduct, and/or derives substantial revenue from goods and services provided to persons and/or entities in California.

5. Venue is proper in this district under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b). Without limitation, on information and belief, LG is subject to personal jurisdiction in this district. On information and belief, LG is subject to this Court's specific and/or general personal jurisdiction, pursuant to due process and/or the California Long Arm Statute, due at least to their substantial business in this district, including related to the infringements alleged herein. Further, on information and belief, LG is, within this forum, engaged in at least the selling of the accused products listed herein. In addition, LG induces infringement of the patent-in-suit by sellers and/or infringing users located in this forum. Further, on information and belief, LG has interactive websites which are used in and/or accessible in this forum. Further, on information and belief, LG regularly conducts and/or solicits business, engages in other persistent courses of conduct, and/or derives substantial revenue from goods and services provided to persons and/or entities in California.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,128,415

6. United States Patent No. 6,128,415 ("the '415 patent"), entitled "DEVICE PROFILES FOR USE IN A DIGITAL IMAGE PROCESSING SYSTEM," issued on October 3, 2000.

7. DIGITECH is the present assignee of the entire right, title and interest in and to the '415 patent, including all rights to sue for past and present infringement. Accordingly, DIGITECH has standing to bring this lawsuit for infringement of the '415 patent.

8. The various claims of the '415 patent cover, *inter alia*, a device profile for describing properties of a device in a digital image reproduction system to capture, transform or render an image, said device profile comprising: first data for describing a device dependent transformation of color information content of the image to a device independent color space; and second data for describing a device dependent transformation of spatial information content of the image in said device independent color space.

9. On information and belief, LG has been and now is infringing the '415 patent by actions comprising making, using, importing, selling and/or offering to sell products comprising a device profile for describing properties of a device in a digital image reproduction system to capture, transform or render an image, said device

profile comprising: first data for describing a device dependent transformation of color information content of the image to a device independent color space; and second data for describing a device dependent transformation of spatial information content of the image in said device independent color space.

10. Moreover, on information and belief, LG has been and now is indirectly infringing by way of intentionally inducing infringement of the '415 patent in this judicial district, and elsewhere in the United States, including by aiding or abetting re-sellers to sell and/or offer for sale infringing products and/or customers and/or users to use infringing products. Upon information and belief, such induced infringement has occurred at least since this LG became aware of the '415 patent, at least through becoming aware of this Complaint.

11. Upon present information and belief, LG's infringing products comprise at least the following accused products: Nexus 4, Optimus LTE, Optimus LTE II, Escape, Spectrum 2, Mach, Optimus Vu II, Optimus Vu, Intuition, Optimus 4X HD, Nitro HD, Lucid, Viper 4G LTE, Optimus G and Spectrum.

12. LG is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. § 271.

13. As a result of LG's infringing conduct, LG has damaged DIGITECH. LG is liable to DIGITECH in an amount that adequately compensates DIGITECH for their infringement, which, by law, can be no less than a reasonable royalty.

14. DIGITECH will take discovery relative to LG's pre-suit knowledge of the '415 patent at the appropriate time. Upon information and belief, LG's infringement of the '415 patent since receiving notice of the patent, at a minimum by virtue of this lawsuit, would necessarily be willful and objectively reckless at least due to the fact that LG's infringement is clear and there is no known good faith basis to assert invalidity.

PRAYER FOR RELIEF

WHEREFORE, DIGITECH respectfully requests that this Court enter:

1. A judgment in favor of DIGITECH that LG has infringed, directly and/or indirectly, the '415 patent;

2. A judgment that LG's infringement is and/or has been willful and objectively reckless;

3. A permanent injunction enjoining LG, and its officers, directors, employees, agents, affiliates and all others acting in active concert therewith from infringing the '415 patent;

4. A judgment and order requiring LG to pay DIGITECH its damages, costs, expenses, and prejudgment and post-judgment interest for LG's infringement of the '415 patent as provided under 28 U.S.C. § 284;

5. An award to DIGITECH for enhanced damages as provided under 35 U.S.C. § 284;

6. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to DIGITECH its reasonable attorneys' fees;

7. Any and all other relief to which DIGITECH may show itself to be entitled.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: January 28, 2013

Respectfully submitted,

COLLINS, EDMONDS, POGORZELSKI, SCHLATHER & TOWER, PLLC



John J. Edmonds – LEAD COUNSEL
State Bar No. 274200

Attorney for Plaintiff
DIGITECH IMAGE TECHNOLOGIES, LLC

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself ☐)	DEFENDANTS
DIGITECH IMAGE TECHNOLOGIES, LLC	LG ELECTRONICS USA, INC., LG ELECTRONICS, INC. and LG ELECTRONICS MOBILECOMM U.S.A., INC.
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) JOHN J. EDMONDS, COLLINS, EDMONDS, POGORZELSKI, SCHLATHER & TOWER, PLLC, 1851 EAST FIRST STREET, SUITE 900 SANTA ANA, CA 92705	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.)

☐ 1 U.S. Government Plaintiff ☑ 3 Federal Question (U.S. Government Not a Party)

☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated or Principal Place of Business in this State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated and Principal Place of Business in Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. ORIGIN (Place an X in one box only.)

☑ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☑ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☑ No ☐ MONEY DEMANDED IN COMPLAINT: $

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Patent Infringement 35 U.S.C § 271

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER PETITIONS	LABOR
☐ 400 State Reapportionment	☐ 110 Insurance	PERSONAL INJURY	PERSONAL PROPERTY	☐ 510 Motions to Vacate Sentence Habeas Corpus	☐ 710 Fair Labor Standards Act
☐ 410 Antitrust	☐ 120 Marine	☐ 310 Airplane	☐ 370 Other Fraud	☐ 530 General	☐ 720 Labor/Mgmt. Relations
☐ 430 Banks and Banking	☐ 130 Miller Act	☐ 315 Airplane Product Liability	☐ 371 Truth in Lending	☐ 535 Death Penalty	☐ 730 Labor/Mgmt. Reporting & Disclosure Act
☐ 450 Commerce/ICC Rates/etc.	☐ 140 Negotiable Instrument	☐ 320 Assault, Libel & Slander	☐ 380 Other Personal Property Damage	☐ 540 Mandamus/ Other	☐ 740 Railway Labor Act
☐ 460 Deportation	☐ 150 Recovery of Overpayment & Enforcement of Judgment	☐ 330 Fed. Employers' Liability	☐ 385 Property Damage Product Liability	☐ 550 Civil Rights	☐ 790 Other Labor Litigation
☐ 470 Racketeer Influenced and Corrupt Organizations	☐ 151 Medicare Act	☐ 340 Marine	BANKRUPTCY	☐ 555 Prison Condition	☐ 791 Empl. Ret. Inc. Security Act
☐ 480 Consumer Credit	☐ 152 Recovery of Defaulted Student Loan (Excl. Veterans)	☐ 345 Marine Product Liability	☐ 422 Appeal 28 USC 158	FORFEITURE/ PENALTY	PROPERTY RIGHTS
☐ 490 Cable/Sat TV	☐ 153 Recovery of Overpayment of Veteran's Benefits	☐ 350 Motor Vehicle	☐ 423 Withdrawal 28 USC 157	☐ 610 Agriculture	☐ 820 Copyrights
☐ 810 Selective Service	☐ 160 Stockholders' Suits	☐ 355 Motor Vehicle Product Liability	CIVIL RIGHTS	☐ 620 Other Food & Drug	☑ 830 Patent
☐ 850 Securities/Commodities/ Exchange	☐ 190 Other Contract	☐ 360 Other Personal Injury	☐ 441 Voting	☐ 625 Drug Related Seizure of Property 21 USC 881	☐ 840 Trademark
☐ 875 Customer Challenge 12 USC 3410	☐ 195 Contract Product Liability	☐ 362 Personal Injury-Med Malpractice	☐ 442 Employment	☐ 630 Liquor Laws	SOCIAL SECURITY
☐ 890 Other Statutory Actions	☐ 196 Franchise	☐ 365 Personal Injury-Product Liability	☐ 443 Housing/Accommodations	☐ 640 R.R. & Truck	☐ 861 HIA (1395ff)
☐ 891 Agricultural Act	REAL PROPERTY	☐ 368 Asbestos Personal Injury Product Liability	☐ 444 Welfare	☐ 650 Airline Regs	☐ 862 Black Lung (923)
☐ 892 Economic Stabilization Act	☐ 210 Land Condemnation	IMMIGRATION	☐ 445 American with Disabilities - Employment	☐ 660 Occupational Safety /Health	☐ 863 DIWC/DIWW (405(g))
☐ 893 Environmental Matters	☐ 220 Foreclosure	☐ 462 Naturalization Application	☐ 446 American with Disabilities - Other	☐ 690 Other	☐ 864 SSID Title XVI
☐ 894 Energy Allocation Act	☐ 230 Rent Lease & Ejectment	☐ 463 Habeas Corpus-Alien Detainee	☐ 440 Other Civil Rights		☐ 865 RSI (405(g))
☐ 895 Freedom of Info. Act	☐ 240 Torts to Land	☐ 465 Other Immigration Actions			FEDERAL TAX SUITS
☐ 900 Appeal of Fee Determination Under Equal Access to Justice	☐ 245 Tort Product Liability				☐ 870 Taxes (U.S. Plaintiff or Defendant)
☐ 950 Constitutionality of State Statutes	☐ 290 All Other Real Property				☐ 871 IRS-Third Party 26 USC 7609

SACV13 - 00134 JST (JPRx)

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

COPY

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☐ No ☑ Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☐ No ☑ Yes
If yes, list case number(s): See Attached

Civil cases are deemed related if a previously filed case and the present case:
(Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☑ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☑ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☑ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Plaintiff (Orange County)	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	LG ELECTRONICS USA, INC. (New Jersey) LG ELECTRONICS, INC. (South Korea) LG ELECTRONICS MOBILECOMM U.S.A., INC. (New Jersey)

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country

*** Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties**
Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____ **Date** 1/28/13

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case?

1. DIGITECH IMAGE TECHNOLOGIES, LLC v. AGFAPHOTO GMBH et al. (Civil Action No. SACV 12-01153-MLG)
2. DIGITECH IMAGE TECHNOLOGIES, LLC v. ELECTRONICS FOR IMAGING, INC. (Civil Action No. SACV 12-01324-JVS-RNB)
3. DIGITECH IMAGE TECHNOLOGIES, LLC v. KONICA MINOLTA HOLDINGS, INC., ET AL (Civil Action No. SACV12-01694-DOC-MLG)
4. DIGITECH IMAGE TECHNOLOGIES, LLC v. XEROX CORPORATION (Civil Action No. SACV12-01693-CJC-RNB)
5. DIGITECH IMAGE TECHNOLOGIES, LLC v. BEST BUY CO., INC.; BEST BUY STORES, LP; BESTBUY.COM, LLC (Civil Action No. SACV12-01669-JVS-MLG)
6. DIGITECH IMAGE TECHNOLOGIES, LLC v. BUY.COM INC. (Civil Action No. SACV12-01668-CJC-MLG)
7. DIGITECH IMAGE TECHNOLOGIES, LLC v. CANON INC.; CANON U.S.A., INC. (Civil Action No. SACV12-01670-CJC-MLG)
8. DIGITECH IMAGE TECHNOLOGIES, LLC v. CASIO COMPUTER CO., LTD.; CASIO AMERICA, INC. (Civil Action No. SACV12-01697-CJC-JPR)
9. DIGITECH IMAGE TECHNOLOGIES, LLC v. CDW LLC (Civil Action No. SACV12-01695-JST-AN)
10. DIGITECH IMAGE TECHNOLOGIES, LLC v. FUJIFILM CORPORATION; FUJIFILM HOLDINGS CORPORATION; FUJIFILM HOLDINGS AMERICA CORPORATION (Civil Action No. SACV12- 01679-AG-JPR)
11. DIGITECH IMAGE TECHNOLOGIES, LLC v. GENERAL IMAGING COMPANY (Civil Action No. SACV12-01680-AG-RNB)
12. DIGITECH IMAGE TECHNOLOGIES, LLC v. VICTOR HASSELBLAD AB; HASSELBLAD USA INC. (Civil Action No. SACV12-01696-AG-RNB)
13. DIGITECH IMAGE TECHNOLOGIES, LLC v. LEICA CAMERA AG; LEICA CAMERA INC. (Civil Action No. SACV12-01677-AG-RNB)

14. DIGITECH IMAGE TECHNOLOGIES, LLC v. MAMIYA DIGITAL IMAGING CO., LTD.; LEAF IMAGING LTD. D/B/A MAMIYALEAF; MAMIYA AMERICA CORPORATION (Civil Action No. SACV12-01675-JVS-JPR)
15. DIGITECH IMAGE TECHNOLOGIES, LLC v. MICRO ELECTRONICS, INC. D/B/A MICRO CENTER (Civil Action No. SACV12-01686-JST-AN)
16. DIGITECH IMAGE TECHNOLOGIES, LLC v. NEWEGG, INC.; NEWEGG.COM, INC. (Civil Action No. SACV12-01688-JVS-MLG)
17. DIGITECH IMAGE TECHNOLOGIES, LLC v. NIKON CORPORATION; NIKON INC.; NIKON AMERICAS, INC. (Civil Action No. SACV12-01685-CJC-JPR)
18. DIGITECH IMAGE TECHNOLOGIES, LLC v. OLYMPUS CORPORATION; OLYMPUS IMAGING AMERICA INC. (Civil Action No. SACV12-01676-JVS-RNB)
19. DIGITECH IMAGE TECHNOLOGIES, LLC v. OVERSTOCK.COM, INC. (Civil Action No. SACV12-01687-AG-RNB)
20. DIGITECH IMAGE TECHNOLOGIES, LLC v. PANASONIC CORPORATION; PANASONIC CORPORATION OF NORTH AMERICA (Civil Action No. SACV12- 01667-AG-JPR)
21. DIGITECH IMAGE TECHNOLOGIES, LLC v. PENTAX RICOH IMAGING CO., LTD.; PENTAX RICOH IMAGING AMERICAS CORPORATION; RICOH COMPANY, LTD.; RICOH AMERICAS CORPORATION (Civil Action No. SACV12-01689-AG-RNB)
22. DIGITECH IMAGE TECHNOLOGIES, LLC v. SAKAR INTERNATIONAL, INC. D/B/A VIVITAR (Civil Action No. SACV12-01673-JVS-AN)
23. DIGITECH IMAGE TECHNOLOGIES, LLC v. SIGMA CORPORATION; SIGMA CORPORATION OF AMERICA (Civil Action No. SACV12-01681-JST-AN)
24. DIGITECH IMAGE TECHNOLOGIES, LLC v. SONY CORPORATION; SONY CORPORATION OF AMERICA; SONY ELECTRONICS INC. (Civil Action No. SACV12-01678-AG-AN)
25. DIGITECH IMAGE TECHNOLOGIES, LLC v. TARGET CORPORATION (Civil Action No. SACV12-01683-JST-RNB)
26. DIGITECH IMAGE TECHNOLOGIES, LLC v. APPLE INC. (Civil Action No. 8:12-cv-02125-ODW-MRW)
27. DIGITECH IMAGE TECHNOLOGIES, LLC v. ACER AMERICA CORPORATION, and ACER INC. (Civil Action No. 8:12-cv-02126-ODW-MRW)

28. DIGITECH IMAGE TECHNOLOGIES, LLC v. TOSHIBA CORPORTATION; TOSHIBA AMERICA, INC.; TOSHIBA AMERICA BUSINESS SOLUTIONS, INC., TOSHIBA AMERICA INFORMATION SYSTEMS, INC. (Civil Action No. 8:12-cv-02127-ODW-MRW)
29. DIGITECH IMAGE TECHNOLOGIES, LLC v. MOTOROLA MOBILITY, INC., MOTOROLA MOBILITY HOLDINGS, LLC and MOTOROLA, INC. (Civil Action No. 8:12-cv-02123-ODW-MRW)
30. DIGITECH IMAGE TECHNOLOGIES, LLC v. HTC AMERICA, INC., HTC CORP. a/k/a HIGH TECH COMPUTER CORP. and HTC (B.V.I) CORP. (Civil Action No. TBD)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Josephine Tucker and the assigned discovery Magistrate Judge is Jean P. Rosenbluth.

The case number on all documents filed with the Court should read as follows:

SACV13- 134 JST (JPRx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

---

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☐ **Western Division** **312 N. Spring St., Rm. G-8** **Los Angeles, CA 90012**	☐ **Southern Division** **411 West Fourth St., Rm. 1-053** **Santa Ana, CA 92701-4516**	☐ **Eastern Division** **3470 Twelfth St., Rm. 134** **Riverside, CA 92501**

Failure to file at the proper location will result in your documents being returned to you.

Name & Address:
JOHN J. EDMONDS (STATE BAR NO. 274200)
COLLINS, EDMONDS, POGORZELSKI,
SCHLATHER & TOWER, PLLC
1851 EAST FIRST STREET, SUITE 900
SANTA ANA, CA 92705

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DIGITECH IMAGE TECHNOLOGIES, LLC PLAINTIFF(S) v. LG ELECTRONICS USA, INC., LG ELECTRONICS, INC. and LG ELECTRONICS MOBILECOMM U.S.A., INC. DEFENDANT(S).	CASE NUMBER **SACV13 - 00134 JST (JPRx)** **SUMMONS**

TO: DEFENDANT(S):

LG Electronics USA, Inc.
By and through its Registered Agent:
United States Corporation Company
2711 Centerville Rd., Ste. 400
Wilmington, DE 19808

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☑ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, John J. Edmonds, whose address is 1851 East First Street, Suite 900, Santa Ana, California 92705. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: JAN 28 2013

By: D Slayman
DODJIE LAGMAN
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

ORIGINAL

Name & Address:
JOHN J. EDMONDS (STATE BAR NO. 274200)
COLLINS, EDMONDS, POGORZELSKI,
SCHLATHER & TOWER, PLLC
1851 EAST FIRST STREET, SUITE 900
SANTA ANA, CA 92705

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DIGITECH IMAGE TECHNOLOGIES, LLC PLAINTIFF(S) v. LG ELECTRONICS USA, INC., LG ELECTRONICS, INC. and LG ELECTRONICS MOBILECOMM U.S.A., INC. DEFENDANT(S).	CASE NUMBER **SACV13 - 00134 JST (JPRx)** **SUMMONS**

TO: DEFENDANT(S):

LG ELECTRONICS, INC.
LG Twin Towers 20
Yeouido-dong, Yeongdeunspo-gu
Seoul 150-721
South Korea

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☑ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, John J. Edmonds, whose address is 1851 East First Street, Suite 900, Santa Ana, California 92705. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: JAN 28 2013

By: D Slyngman DODJIE LAGMAN
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

ORIGINAL

Name & Address:
JOHN J. EDMONDS (STATE BAR NO. 274200)
COLLINS, EDMONDS, POGORZELSKI,
SCHLATHER & TOWER, PLLC
1851 EAST FIRST STREET, SUITE 900
SANTA ANA, CA 92705

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DIGITECH IMAGE TECHNOLOGIES, LLC PLAINTIFF(S) v. LG ELECTRONICS USA, INC., LG ELECTRONICS, INC. and LG ELECTRONICS MOBILECOMM U.S.A., INC. DEFENDANT(S).	CASE NUMBER **SACV13 - 00134 JST (JPRx)** **SUMMONS**

TO: DEFENDANT(S):

LG ELECTRONICS MOBILECOMM U.S.A., INC.
By and through its Registered Agent:
Alan K. Tse
10101 Old Grove Rd.
San Diego, CA 92131

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☑ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, John J. Edmonds, whose address is 1851 East First Street, Suite 900, Santa Ana, California 92705. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: JAN 28 2013

By: D Slagman
DODJIE LAGMAN
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

ORIGINAL