

3. Upon information and belief, Defendant Sony Electronics, Inc (“SEL”) is a corporation organized under the laws of the State of Delaware with its principal place of business in San Diego, California. Upon information and belief, SEL is a wholly owned subsidiary of Sony Japan.

4. Upon information and belief, Defendant Sony Corporation of America, Inc. (“Sony America”) is a corporation organized under the laws of the State of New York with its principal place of business in New York, New York.

5. Upon information and belief, Defendant Sony Corporation (“Sony Japan”) is a foreign corporation organized under the laws of Japan with its principal place of business in Tokyo, Japan.

JURISDICTION AND VENUE

6. This is an action for patent infringement arising under the patent laws of the United States, Title 35, United States Code, including 35 U.S.C. §§ 271 and 281-285. Accordingly, this Court has exclusive subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

7. This Court has personal jurisdiction over SEL.

8. Upon information and belief, SEL conducts business within the State of Texas. Upon information and belief, SEL uses, manufactures, imports, markets, distributes, sells, and offers to sell in the United States, including in this judicial district, consumer and professional video equipment, and peripheral products, including among other things, the Sony HVL-LBP (Camera-Mounted Video Light). Said equipment is sold and/or offered for sale in the State of Texas, via Texas-based Sony dealers, and online at www.sony.com. This equipment is also offered for sale and distribution through B&H

Photo & Electronics Corp.'s online store at www.bhphotovideo.com Therefore, SEL has made this product available for purchase and delivery in the Eastern District of Texas

9. Upon information and belief, Defendant SEL has induced, directed, contracted with, or encouraged distributors, resellers, and similar entities to sell camera accessory systems, including camera-mounted lighting systems to consumers in the United States and, including, in the Eastern District of Texas. SEL has voluntarily and purposely placed these products in the stream of commerce with the expectation they will be offered for sale and sold in the State of Texas, including in the Eastern District of Texas.

10. Upon information and belief, SEL directly or indirectly shipped, imported, distributed, offered for sale, sold, and/or advertised (including directly targeting consumers via sales catalogs which provide the means for consumers to directly order and purchase products including those that infringe Litepanels' patents) products and services in and to the United States, the State of Texas, and, the Eastern District of Texas.

11. Upon information and belief, SEL has induced, directed, contracted with, or encouraged resellers, and similar entities to sell lighting systems and accessories to consumers in the United States and particularly, in the Eastern District of Texas.

12. SEL has purposefully and voluntarily placed infringing products and services in the stream of commerce with the expectation that such products will be purchased by consumers in the Eastern District of Texas. Plaintiffs know of one or more infringing product that has been advertised, sold, and delivered to the Eastern District of Texas

13. SEL has committed patent infringement within the State of Texas and this

District

14. This Court has personal jurisdiction over Sony America.

15. Upon information and belief, Sony America conducted business within the State of Texas. Upon information and belief, Sony America, through its wholly owned subsidiaries and/or third parties, imports into the United States and distributes and sells and/or offers to sell throughout the United States, including in the State of Texas and, in particular, in the Eastern District of Texas, electronic equipment including among other things, the Sony HVL-LBP (Camera-Mounted Video Light). Said equipment is sold and/or offered for sale in the State of Texas via Texas-based Sony dealers, and online at www.sony.com. This equipment is also offered for sale and distribution through B&H Photo & Electronics Corp.'s online store at www.bhphotovideo.com. Therefore, Sony America has made this product available for purchase and delivery in the Eastern District of Texas.

16. Upon information and belief, Defendant Sony America has induced, directed, contracted with, or encouraged distributors, resellers, and similar entities to sell camera accessory systems, including camera-mounted lighting systems to consumers in the United States and, more particularly, in the Eastern District of Texas. Sony America has voluntarily and purposely placed these products in the stream of commerce with the expectation they will be offered for sale and sold in the State of Texas, including in the Eastern District of Texas.

17. Upon information and belief, Sony America directly or indirectly shipped, imported, distributed, offered for sale, sold, and/or advertised (including directly targeting consumers via sales catalogs which provide the means for consumers to directly

order and purchase products including those that infringe Litepanels' patents) its products and services in and to the United States, the State of Texas, and, the Eastern District of Texas.

18. Upon information and belief, Sony America has induced, directed, contracted with, or encouraged resellers, and similar entities to sell lighting systems and accessories to consumers in the United States and particularly, in the Eastern District of Texas

19. Upon information and belief, Sony America has purposefully and voluntarily placed infringing products and services in the stream of commerce with the expectation that such products will be purchased by consumers in the Eastern District of Texas. Plaintiffs know of at least one infringing product that has been advertised, sold, and delivered to the Eastern District of Texas.

20. Sony America has committed patent infringement within the State of Texas and this District.

21. This Court has personal jurisdiction over Sony Japan.

22. Upon information and belief, Sony Japan conducts business within the State of Texas. Upon information and belief, Sony Japan, through its wholly owned subsidiaries and/or third parties, imports into the United States and distributes and sells and/or offers to sell throughout the United States, including in the State of Texas and, in particular, in the Eastern District of Texas, electronic equipment including among other things, the Sony HVL-LBP (Camera-Mounted Video Light). Said equipment is sold and/or offered for sale in the State of Texas via Texas-based Sony dealers, and online at

www.sony.com This equipment is also offered for sale and distribution through B&H Photo & Electronics Corp 's online store at www.bhphotovideo.com. Therefore, Sony Japan has made this product available for purchase and delivery in the Eastern District of Texas

23 Upon information and belief, Defendant Sony Japan has induced, directed, contracted with, or encouraged distributors, resellers, and similar entities to sell camera accessory systems, including camera-mounted lighting systems to consumers in the United States and, more particularly, in the Eastern District of Texas. Sony Japan has voluntarily and purposely placed these products in the stream of commerce with the expectation they will be offered for sale and sold in the State of Texas, including in the Eastern District of Texas.

24 Upon information and belief, Sony Japan directly or indirectly shipped, imported, distributed, offered for sale, sold, and/or advertised (including directly targeting consumers via sales catalogs which provide the means for consumers to directly order and purchase products including those that infringe Litepanels' patents) its products and services in and to the United States, the State of Texas, and, the Eastern District of Texas

25 Upon information and belief, Sony Japan has induced, directed, contracted with, or encouraged resellers, and similar entities to sell lighting systems and accessories to consumers in the United States and particularly, in the Eastern District of Texas.

26 Upon information and belief, Sony Japan has purposefully and voluntarily placed infringing products and services in the stream of commerce with the expectation that such products will be purchased by consumers in the Eastern District of Texas.

Plaintiffs know of one or more infringing product that has been advertised, sold, and delivered to the Eastern District of Texas

27. Sony Japan has committed patent infringement within the State of Texas and this District.

28. In the alternative this Court also has personal jurisdiction over Sony Japan under Federal Rule of Civil Procedure 4(k)(2), consistent with the Constitution and laws of the United States.

29. Venue is proper in this District under 28 U.S.C §§ 1391, and 1400.

PATENT INFRINGEMENT

30. Plaintiffs reallege and incorporate by reference ¶¶ 1 through 29 above as fully set forth herein.

31. United States Patent No. 6,948,823 (hereinafter “the ‘823 patent”), entitled “Wide Area Lighting Apparatus and Effects System,” duly and legally issued on September 27, 2005, by the United States Patent and Trademark Office after fair and full examination. Litepanels, LLC is the assignee of all rights, title and interest in and to the ‘823 patent. Litepanels, Inc. is the exclusive licensee of the ‘823 patent from Litepanels, LLC.

32. United States Patent No. 7,163,302 (hereinafter “the ‘302 patent”), entitled “Camera-Mounted Semiconductor Lighting Apparatus,” duly and legally issued on January 16, 2007, by the United States Patent and Trademark Office after fair and full examination. Litepanels, LLC is the assignee of all rights, title and interest in and to the ‘302 patent. Litepanels, Inc. is the exclusive licensee of the ‘302 patent from Litepanels,

LLC.

33. SEL, Sony America, and Sony Japan make, use, sell, import, or offer to sell lighting systems in competition with Litepanels, LLC and Litepanels, Inc

34. Upon information and belief, SEL, Sony America and Sony Japan knowingly and willfully infringed and continue to infringe the '823 and '302 patents by making, using, selling, importing, or offering to sell within the United States, or actively inducing others to make, use, sell, import, or offer to sell within the United States, goods and services that practice the patents in suit.

35. SEL, Sony America and Sony Japan have infringed and continue to infringe the patents in suit directly and through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

REMEDIES

36. Plaintiffs reallege and incorporate by reference ¶¶ 1 through 35 above as fully set forth herein.

37. Litepanels, LLC and Litepanels, Inc. have been damaged as a result of the infringing activities of SEL, Sony America, and Sony Japan and will continue to be damaged unless such activities are enjoined by this Court

38. Upon information and belief, SEL's, Sony America's and Sony Japan's infringement of the '823 and '302 patents has been and is willful, and will continue unless enjoined by this Court.

39. SEL, Sony America and Sony Japan have received actual notice of Plaintiffs' rights in the '823 and '302 patents and their infringement thereof by written

notice, by filing suit or otherwise, or, in the alternative, have been given constructive notice pursuant to 35 U.S.C. § 287(a).

40. Litepanels, LLC and Litepanels, Inc will continue to suffer, and they will be irreparably harmed if infringement of the '823 and '302 patents by SEL, Sony America and/or Sony Japan continues.

41. This case is exceptional, and therefore, Litepanels, LLC and Litepanels, Inc are entitled to attorneys' fees and costs pursuant to 35 U.S.C. § 285

JURY DEMAND

42. Plaintiffs Litepanels, LLC and Litepanels, Inc. hereby demand a trial by jury pursuant to Federal Rule of Civil Procedure 38.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs Litepanels, LLC and Litepanels, Inc. respectfully request that the Court:

(a) enter judgment for Litepanels, LLC and Litepanels, Inc against SEL, Sony America, and Sony Japan on this complaint;

(b) enter judgment declaring that the claims of the '823 and '302 patents are not invalid and not unenforceable;

(c) enter judgment that the '823 and '302 patents have been and/or continue to be infringed by SEL, Sony America, and/or Sony Japan;

(d) enter judgment awarding Litepanels, LLC and Litepanels, Inc. all damages adequate to compensate them for SEL's, Sony America's, and/or Sony Japan's infringement, such damages to be determined by a jury, and if necessary to adequately

compensate Litepanels, LLC and Litepanels, Inc. for the infringement, an accounting with prejudgment interest

(e) enter a preliminary and permanent injunction enjoining SEL, Sony America, and/or Sony Japan and those acting in privity with and/or in concert with SEL, Sony America, and/or Sony Japan from infringing the '823 patent during the remainder of the term of the '823 patent;

(d) enter a preliminary and permanent injunction enjoining SEL, Sony America, and Sony Japan and those acting in privity with and/or in concert with SEL, Sony America, and/or Sony Japan from infringing the '302 patent during the remainder of the term of the '302 patent;

(e) enter judgment that SEL, Sony America, and/or Sony Japan willfully infringed the '823 and '302 patents and awarding enhanced damages pursuant to 35 U.S.C. § 284;

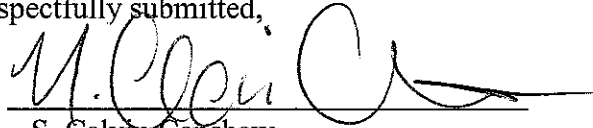
(f) enter judgment that this is an exceptional case and an award of attorneys' fees and costs to Litepanels, LLC and Litepanels, Inc. pursuant to 35 U.S.C. § 285;

(g) enter judgment awarding Litepanels, LLC and Litepanels, Inc. such other relief as this Court may deem is just and proper.

DATED: July 28, 2008

Respectfully submitted,

By:



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