

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of

**CERTAIN MULTIMEDIA DISPLAY AND
NAVIGATION DEVICES AND SYSTEMS,
COMPONENTS THEREOF, AND
PRODUCTS CONTAINING SAME**

Investigation No. 337-TA-____

**COMPLAINT OF PIONEER CORPORATION
UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED**

COMPLAINANTS

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TABLE OF CONTENTS

| | | |
|------|---|----|
| I. | INTRODUCTION | 1 |
| II. | COMPLAINANTS | 2 |
| III. | RESPONDENTS | 3 |
| IV. | THE TECHNOLOGY AND PRODUCTS AT ISSUE | 4 |
| V. | THE PATENTS-IN-SUIT AND NON-TECHNICAL DESCRIPTION OF THE INVENTIONS..... | 5 |
| A. | U.S. Patent No. 5,365,448..... | 6 |
| 1. | Identification of the Patent and Ownership by Pioneer Corporation | 6 |
| 2. | Non-Technical Description of the Patent..... | 6 |
| 3. | Foreign Counterparts to the Patent | 7 |
| 4. | Licenses..... | 7 |
| B. | U.S. Patent No. 6,122,592..... | 8 |
| 1. | Identification of the Patent and Ownership by Pioneer Corporation | 8 |
| 2. | Non-Technical Description of the Patent..... | 9 |
| 3. | Foreign Counterparts to the Patent | 10 |
| 4. | Licenses..... | 10 |
| C. | U.S. Patent No. 5,424,951..... | 10 |
| 1. | Identification of the Patent and Ownership by Pioneer Corporation | 10 |
| 2. | Non-Technical Description of the Patent..... | 11 |
| 3. | Foreign Counterparts to the Patent | 11 |
| 4. | Licenses..... | 11 |
| VI. | UNLAWFUL AND UNFAIR ACTS OF RESPONDENTS – PATENT INFRINGEMENT..... | 12 |

| | | |
|-------|---|----|
| A. | Garmin International, Inc. and Garmin Corp..... | 12 |
| B. | Honeywell International, Inc. | 13 |
| VII. | SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE | 15 |
| A. | Garmin International, Inc. and Garmin Corp..... | 15 |
| B. | Honeywell International, Inc. | 15 |
| VIII. | HARMONIZED TARIFF SCHEDULE ITEM NUMBERS..... | 15 |
| IX. | RELATED LITIGATION | 16 |
| X. | THE DOMESTIC INDUSTRY | 16 |
| XI. | RELIEF REQUESTED..... | 18 |

Table of Exhibits

| Exhibit | Document |
|----------------|---|
| 1 | Name Change Recordation Document |
| 2 | United States Patent No. 5,365,448 |
| 3 | Assignment Document for U.S. Patent No. 5,365,448 |
| 4 | United States Patent No. 6,122,592 |
| 5 | Assignment Document for U.S. Patent No. 6,122,592 |
| 6 | United States Patent 5,424,951 |
| 7 | Assignment Document for U.S. Patent No. 5,424,951 |
| 8 | Table Identifying Foreign Counterparts of the '448 Patent |
| 9 | Table Identifying Foreign Counterparts of the '592 Patent |
| 10 | Table Identifying Foreign Counterparts of the '951 Patent |
| 11 | CONFIDENTIAL Identification of Licensees |
| 12 | Claim Charts: Infringement of '448 Patent by Garmin Navigation Systems |
| 13 | Claim Charts: Infringement of '592 Patent by Garmin Navigation Systems |
| 14 | Claim Charts: Infringement of '951 Patent by Garmin Navigation Systems |
| 15 | Claim Charts: Infringement of '592 Patent by Honeywell Navigation Systems |
| 16 | Claim Charts: Infringement of '951 Patent by Honeywell Navigation Systems |
| 17 | Documents and Photographs of Representative Accused Infringing Garmin Navigation Systems Demonstrating Specific Instance of Importation and Sale |
| 18 | Documents and Photographs of Representative Accused Infringing Honeywell Navigation Systems Demonstrating Specific Instance of Importation and Sale |
| 19 | CONFIDENTIAL Identification of Pioneer's Domestic Industry |

| Appendix | Document |
|-----------------|--|
| A | Certified Prosecution History of United States Patent No. 5,365,448 |
| B | Copies of References Cited in Prosecution History of U.S. Patent No. 5,365,448 |
| C | Certified Prosecution History of United States Patent No. 5,424,951 |
| D | Copies of References Cited in Prosecution History of U.S. Patent No. 5,424,951 |
| E | Certified Prosecution History of United States Patent No. 6,122,592 |
| F | Copies of References Cited in Prosecution History of U.S. Patent No. 6,122,592 |
| G | Uncertified Prosecution History of United States Patent No. 6,122,592, including United States Patent Nos. 5,938,719 and 5,617,319 and United States Patent Application No. 08/016,292 |
| H | Physical Sample of Garmin's Navigation System |
| I | Physical Sample of Honeywell's Navigation System |

I. INTRODUCTION

1. This Complaint is filed by Complainants Pioneer Corporation (“Pioneer Corp.”) and Pioneer Electronics (USA) Inc. (“Pioneer USA”) (collectively “Pioneer”) pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337. Pioneer Corp. manufactures and sells multimedia display and navigation devices and systems and products containing the same in Japan and throughout the world, and Pioneer USA markets and sells such products in the United States. Pioneer also licenses and attempts to license its technology covering such products to other companies.

2. Pioneer brings this action seeking relief under Section 337 to prevent the unlawful importation into the United States, the sale for importation, and the sale within the United States after importation by owners, importers, or consignees of certain multimedia display and navigation devices and systems, components thereof, and products containing the same that infringe United States Letters Patent Nos. 5,365,448 (“the ’448 patent”), 6,122,592 (“the ’592 patent”), and 5,424,951 (“the ’951 patent”) (collectively “the asserted patents”).

3. The proposed respondents are Garmin International, Inc., Garmin Corporation (collectively “Garmin”), and Honeywell International Inc. (“Honeywell”).

4. Certified copies of the ’448, ’592, and ’951 patents are attached. Pioneer Corp. owns all right, title, and interest in each of the asserted patents. Certified copies of the recorded assignments for the ’448, ’592, and ’951 patents are also attached. Copies of the prosecution histories and technical references cited therein of the ’448, ’592, and ’951 patents are being submitted concurrently with this complaint. Although Pioneer has requested certified copies of the prosecution histories for the asserted patents, all certified portions thereof have not yet been provided by the U.S. Patent and Trademark Office. They will be submitted when they become available.

5. A domestic industry as required by 19 U.S.C. § 1337(a)(2) and (3) exists in the United States relating to the technology protected by the asserted patents.

6. Pioneer seeks, as relief, an exclusion order barring from entry into the United States infringing multimedia display and navigation devices and systems, components thereof, and products containing the same.

II. COMPLAINANTS

7. Complainant Pioneer Corp. is a Japanese corporation with its principal place of business at 1-4-1 Meguro, Meguro-ku, Tokyo 153-8654, Japan. Pioneer Corp. is the same legal entity as Pioneer Electronic Corp. A corporate name change has taken place, changing “Pioneer Electronic Corporation” to “Pioneer Corporation.” *See* Exhibit 1.

8. Complainant Pioneer USA is a Delaware corporation with its principal place of business at United States 2255 E. 220th Street, Long Beach, California, 90810. Pioneer USA is a subsidiary of Pioneer Corp.

9. Founded in 1938, Pioneer has grown to become a world leader in electronics products for the car, home, and business markets. Pioneer was one of the first developers of CD-based GPS navigation systems in 1990 and was one of the first developers of DVD-based GPS navigation systems in 1997. Pioneer also was one of the first developers of navigation systems using wireless communication units in 2002. Pioneer has continued to research, develop, and manufacture innovative multimedia display and navigation devices and systems and products containing such devices and systems, sustaining its position as a market leader in the field of navigation technology.

10. Pioneer continues to invest significant portions of its operating budget each year to research and development, and has developed an extensive patent portfolio over the years from these efforts. This portfolio covers many of the technologies that Pioneer has developed to

date, including multimedia display and navigation devices and systems and products containing such devices and systems, such as portable GPS navigation systems. Over the years, Pioneer has actively sought to license its patents to others. Pioneer has also contributed patents to certain patent licensing groups relating to DVD and DVD-RW/-R discs and players, and those patents have been licensed to a significant portion of the electronics industry.

11. Pioneer's Discovision Associates ("DVA") subsidiary has also been engaged in licensing activities. DVA, which became part of Pioneer in 1989, developed a large portfolio of patents arising from its breakthrough research and development work in laser discs. Pioneer's DVA subsidiary has actively licensed these patents. In addition, licensing personnel at DVA have been involved in efforts to license other patents in Pioneer's portfolio, including the patents asserted in this Complaint.

III. RESPONDENTS

12. Respondent Garmin International, Inc. is a Kansas corporation with its principal place of business at 1200 E. 151st Street, Olathe, Kansas 66062. On information and belief, Garmin International, Inc. designs, manufactures, imports for sale, and sells multimedia display and navigation devices and systems and products containing such devices and systems in the United States that infringe the asserted patents.

13. Respondent Garmin Corporation is a Taiwanese corporation with its principal place of business at No 68, Jangshu 2nd Road, Shijr, Taipei County, Taiwan. On information and belief, Garmin Corporation designs, manufactures, imports for sale, and sells multimedia display and navigation devices and systems and products containing such devices and systems, such as portable GPS navigation systems, that infringe the asserted patents.

14. Respondent Honeywell International Inc. ("Honeywell") is a New Jersey corporation with its principal place of business at 101 Columbia Road, Morristown, NJ 07960.

On information and belief, Honeywell designs, manufactures, imports for sale, and sells multimedia display and navigation devices and systems and products containing such devices and systems, such as portable GPS navigation systems, that infringe the asserted patents.

IV. THE TECHNOLOGY AND PRODUCTS AT ISSUE

15. The technology and products at issue concern multimedia display and navigation devices and systems, components thereof, and products containing such devices and systems, such as portable GPS navigation systems.

16. Early navigation systems employed minimal display technology, provided little pre-stored information about locations a user could travel to, and did not reliably provide route guidance information to users. Those early systems were improved with the development of technologies relating to how information is processed, organized, and displayed to users.

17. In the past, users of early navigation systems had to perform complicated operations in order to register a service facility with the system so that the system would display relevant information about the facility on the map whenever the system was physically near the facility. Moreover, early systems could not display the distances between a location distinct from the system's location to a destination. Finally, early displays did not allow users to easily select and display map information associated with specific types of locations the user might like to visit.

18. In addition, early systems often prematurely erased information associated with a destination from the system memory before the user actually arrived at the destination. When the destination information was erased, the system would stop providing route guidance before the user reached the destination.

19. Current generation navigation systems now include multimedia displays depicting information about millions of pre-stored locations to which users may wish to travel. With this

large amount of information, it becomes increasingly important to provide technologies that categorize and organize the information relating to pre-stored locations that can be efficiently displayed to aid the user in selecting a destination or point of interest. It is also important to simplify the operations involved in the selection processes, so that a user can easily choose pre-stored locations to be displayed by the system when these locations are in the vicinity of the displayed map region.

20. As the methods for determining the position of a navigation system have grown more accurate, it has become possible to provide reliable route guidance to users. It is important for navigation systems to process current location information and use that information to ensure that route guidance is provided until the system confirms that the destination has been reached.

21. Pioneer's continuing development efforts to improve navigation systems through development of new technologies relating to how information is processed, organized, and displayed in those systems have significantly contributed to the evolution of multimedia display and navigation devices and systems, including GPS-based navigation systems.

22. The specific products at issue in this investigation are multimedia display and navigation devices and systems, components thereof, and products containing the same, that are capable of processing, organizing, and displaying information in a manner that comes within the scope of the asserted patents' claims.

V. THE PATENTS-IN-SUIT AND NON-TECHNICAL DESCRIPTION OF THE INVENTIONS

23. Complainants assert three patents in this investigation: U.S. Patent No. 5,365,448 ("the '448 patent), U.S. Patent No. 6,122,592 ("the '592 patent), and U.S. Patent No. 5,424,951 ("the '951 patent").

A. U.S. Patent No. 5,365,448

1. Identification of the Patent and Ownership by Pioneer Corporation

24. The '448 patent, entitled "On-Vehicle Navigation Apparatus with Automatic Re-Initialization Function," issued on November 15, 1994, to inventors Kenichi Nobe and Morio Araki. The '448 patent is based on U.S. Patent Application No. 07/858,645, filed March 27, 1992, claiming priority to Japanese Patent Application No. 3-079881, filed on April 21, 1991.

25. The '448 patent has 1 independent claim and 4 dependent claims. Claims 1 and 2 are being asserted against Garmin in this Investigation.

26. Pioneer Electronic Corp., and therefore Pioneer Corp., owns by assignment the entire right, title, and interest in the '448 patent. *See* Exhibit 3. Pioneer Corp. is the same legal entity as Pioneer Electronic Corp., resulting from a name change in 1999 from "Pioneer Electronic Corporation" to "Pioneer Corporation." *See* Exhibit 1.

27. This Complaint is accompanied by an original certified prosecution history of the '448 patent, three additional copies of the prosecution history, and four copies of each reference cited on the face of the '448 patent or mentioned in the prosecution history. *See* Appendices A and B.

2. Non-Technical Description of the Patent

28. The '448 patent generally covers improvements to the way navigation systems display navigation information, including the distance and direction from the present location of the system to a destination. Navigation systems provide reliable route guidance by verifying that a set destination is reached before ceasing to provide guidance. To ensure that route guidance is not stopped before a destination is reached, it is important to preserve set destination coordinate data in the memory where it is stored until the system verifies that the navigation system has, in

fact, reached the destination. For example, if a user on the way to a destination stops for gas, the system must remember the destination and continue to provide route guidance once the car is turned back on. On the other hand, the user might reach the destination but have to park a half-mile away. In that instance, it is desirable that the system consider the destination reached and stop providing directions to the destination when the car is started again.

29. As taught generally in the '448 patent, when a navigation system is travelling to a set destination, the system compares a predetermined distance value to the calculated distance from the present position to the destination, essentially determining how close the system has gotten to the destination in comparison to a standard. The navigation system does not erase the destination coordinate data from the memory in which it is stored until the distance from the present location to the destination approaches the predetermined value and the engine of the vehicle is started. In this manner, the display of route guidance does not cease before the destination is actually reached, and the navigation system facilitates arrival at the destination, while also ensuring that once the user comes quite close to the destination, the system is ready for a new destination.

3. Foreign Counterparts to the Patent

30. The '448 patent has a number of foreign counterparts. Those foreign patents and applications, as well as related U.S. applications and patents, are identified in Exhibit 8.

4. Licenses

31. Pursuant to Commission Rule 210.12(a)(9)(iii), a list of licensed entities is attached to this Complaint as Confidential Exhibit 11.

B. U.S. Patent No. 6,122,592

1. Identification of the Patent and Ownership by Pioneer Corporation

32. The '592 patent, entitled "Navigation Apparatus with Enhanced Positional Display Function," issued on September 19, 2000, to inventors Takeharu Arakawa, Morio Araki, Kenichi Nobe, and Kiyoshi Yamanaka. The '592 patent is based on U.S. Patent Application No. 09/295,580, filed April 22, 1999, which is a continuation of:

- (a) U.S. Patent Application No. 08/734,778, filed October 22, 1996, issued as U.S. Patent No. 5,938,719 on August 17, 1999, which is a continuation of:
- (b) U.S. Patent Application No. 08/447,882, filed May 23, 1995, which issued as U.S. Patent No. 5,617,319 on April 1, 1997, which is a continuation of:
- (c) U.S. Patent Application No. 08/016,292, filed February 11, 1993, now abandoned.

The '592 patent claims priority to Japanese Patent Application No. 4-31046, filed on February, 18, 1992, Japanese Patent Application No. 4-74032, filed on March 30, 1992, and Japanese Patent Application No. 4-74033, filed on March 30, 1992.

33. The '592 patent has 1 independent claim and 1 dependent claim. Claims 1 and 2 are being asserted against Garmin and Honeywell in this Investigation.

34. Pioneer Corp. owns by assignment the entire right, title, and interest in the '592 patent. *See Exhibit 5.* Pioneer Corp. is the same legal entity as Pioneer Electronic Corp., resulting from a name change from "Pioneer Electronic Corporation" to "Pioneer Corporation." *See Exhibit 1.*

35. This Complaint is accompanied by the original certified prosecution history of the '580 application, three additional copies of the '580 application, and four non-certified copies of each of the prosecution histories of the '778, '882, and '292 applications. Pioneer has

requested certified prosecution histories for the '778, '882, and '292 applications, but the PTO has not yet provided those copies. Once the additional certified copies have been received, Pioneer will substitute those certified copies for the current non-certified copies. In addition, the Complaint is accompanied by four copies of each reference cited on the face of the '592 patent or mentioned in the prosecution history. *See* Appendices E, F, and G.

2. Non-Technical Description of the Patent

36. The '592 patent generally covers improvements to the map display system associated with a navigational system. When a user employs a navigation system to obtain route guidance to a particular destination, the user may also wish to add points other than the destination to her route. Further, the user may wish to select an additional route point from pre-stored locations that are organized and displayed by category of location. It is important for the navigation system to display the additional locations belonging to a selected category so that the user can select an additional destination within the category that is not too far away from the already planned destination.

37. As taught generally in the '592 patent, the navigation system displays a map around the present location of the system, allowing a user to input a destination. When a user wishes to add another point to her route, the navigation system displays additional locations categorized by type of location. The user can select a category, causing the navigation system to calculate the distance between the destination and each location within the selected category. Merely as an example, if a user wishes to go to a coffee shop near her destination, a system could allow her to choose "coffee shop" as the category and the system will then show her the various coffee shops in the vicinity of her destination as well as the distances from the destination to each shop. The navigation system displays the locations within the selected category in an order based on the distances between the destination and each individual location in the category.

3. Foreign Counterparts to the Patent

38. The '592 patent has a number of foreign counterparts. Those foreign patents and applications, as well as related U.S. applications and patents, are identified in Exhibit 9.

4. Licenses

39. Pursuant to Commission Rule 210.12(a)(9)(iii), a list of licensed entities is attached to this Complaint as Confidential Exhibit 11.

C. U.S. Patent No. 5,424,951

1. Identification of the Patent and Ownership by Pioneer Corporation

40. The '951 patent, entitled "On-Board Navigation Apparatus Having User Registering Function," issued on June 13, 1995, to inventors Kenichi Nobe, Morio Araki, and Takeharu Arakawa. The '951 patent is based on U.S. Patent Application No. 07/858,852, filed March 27, 1992, and claims priority to Japanese Patent Application No. 3-079884, filed on April, 12, 1991.

41. The '951 patent has 1 independent claim and 1 dependent claim. Claims 1 and 2 are being asserted against Garmin and Honeywell in this Investigation.

42. Pioneer Corp. owns by assignment the entire right, title, and interest in the '951 patent. *See* Exhibit 7. Pioneer Corp. is the same legal entity as Pioneer Electronic Corp., resulting from a name change from "Pioneer Electronic Corporation" to "Pioneer Corporation." *See* Exhibit 1.

43. This Complaint is accompanied by a certified copy of the prosecution history of the '951 patent, three additional copies of the prosecution history, and four copies of each reference cited on the face of the '951 patent or mentioned in the prosecution history. *See* Appendices C and D.

2. Non-Technical Description of the Patent

44. The '951 patent generally covers improvements to the way in which navigation systems allow users to register information associated with a service facility. Navigation systems display information associated with service facilities to allow a user to register one or more service facilities with the system. It is important to allow a user to register a service facility through a simple operation so that the facility is displayed on the navigation system's map. It is also important for registered service facilities of different types, such as hotels and restaurants, to be displayed using different patterns that distinguish each facility type.

45. As taught generally in the '951 patent, information associated with many service facilities, including pattern data associated with the type of facility and coordinate data related to the location of the facility, is read out from a memory and displayed by the navigation system. A user selects a facility to register it. Once registered, the navigation system will display the pattern information of the facility on the map when the coordinates of the facility fall within the coordinates of the region being displayed. For example, if the user drives near one of the registered facilities, the pattern data will be displayed on the map. Many different facilities can be registered and displayed, and each type of facility is associated with its own pattern that is displayed.

3. Foreign Counterparts to the Patent

46. The '951 patent has a number of foreign counterparts. Those foreign patents and applications, as well as related U.S. applications and patents, are identified in Exhibit 10.

4. Licenses

47. Pursuant to Commission Rule 210.12(a)(9)(iii), a list of licensed entities is attached to this Complaint as Confidential Exhibit 11.

VI. UNLAWFUL AND UNFAIR ACTS OF RESPONDENTS – PATENT INFRINGEMENT

48. The accused products are multimedia display and navigation devices and systems, components thereof, and products containing the same, including, but not limited to, portable GPS navigation systems.

A. Garmin International, Inc. and Garmin Corp.

49. Generally, any of the Garmin respondents' portable GPS navigation systems, including, but not limited to, those belonging to Garmin's Nüvi® or Zūmo® product lines, are accused of infringing claims 1-2 of the '592 patent, and claims 1-2 of the '951 patent. Such products include the Nüvi® 205 Series, Nüvi® 500 Series, Nüvi® 705 Series, Nüvi® 805 Series, Nüvi® 1200 Series, Nüvi® 1300 Series, Nüvi® 1400 Series, and Nüvi® 5000 Series products, as well as the Zūmo® 550 Series and Zūmo® 660 Series products.

50. In addition, the Garmin respondents' portable GPS navigation systems, including but not limited to Garmin's Nüvi® 205 Series, Nüvi® 805 Series, or Zūmo® 550 Series product lines are accused of infringing claims 1-2 of the '448 patent. Such products include the Nüvi® 255W, Nüvi® 885T, and Zūmo® 550 products.

51. On information and belief, the Garmin respondents collectively manufacture, sell for importation, import, and/or sell after importation portable GPS navigation systems that infringe one or more of the asserted patents. For example, at least the Garmin Nüvi® 885T portable GPS navigation system infringes one or more of the asserted patents. The identification of a specific model or type of product is not intended to limit the scope of the Investigation, and any remedy should extend to all infringing products.

52. A chart that applies independent claim 1 of the '448 patent to the accused Nüvi® 885T portable GPS navigation system is attached to the Complaint as Exhibit 12.

53. A chart that applies independent claim 1 of the '592 patent to the accused Nüvi® 885T portable GPS navigation system is attached to the Complaint as Exhibit 13.

54. A chart that applies independent claim 1 of the '951 patent to the accused Nüvi® 885T portable GPS navigation system is attached to the Complaint as Exhibit 14.

55. To the extent that any of the asserted claims require products sold by the Garmin respondents to be operated as a component of a vehicular system to satisfy all claim elements, on information and belief the accused products infringe both directly and indirectly.

56. On information and belief, the respondents test or operate the accused products in the United States by using them in automotive systems thereby directly infringing any claim requiring such operation.

57. The Garmin respondents have had notice of the asserted patents since before the filing of this Complaint, or at a minimum, will receive notice of the asserted patents upon the filing of this Complaint. Garmin participated in licensing negotiations with Pioneer and therefore should have had notice of the asserted patents.

58. Each of the accused products enumerated above are designed to be used in a vehicle.

59. On information and belief, the Garmin respondents know about the asserted patents and actively induce infringement of the asserted claims of the asserted patents by designing their products to be capable of infringement and by promoting and encouraging the use of their products in ways that infringe the asserted claims.

B. Honeywell International, Inc.

60. Generally, any of Honeywell's portable GPS navigation systems, including, but not limited to, those belonging to its AV80R™ product line, are accused of infringing claims 1-2

of the '592 patent and claims 1-2 of the '951 patent. Such products include the AV80R™ Handheld and AV80R™ ACE navigation units.

61. On information and belief, Honeywell manufactures, sells for importation, imports, and/or sells after importation portable GPS navigation systems that infringe one or more of the asserted patents. For example, at least the Honeywell AV80R™ Handheld portable GPS navigation system infringes one or more of the asserted patents. The identification of a specific model or type of product is not intended to limit the scope of the Investigation, and any remedy should extend to all infringing products.

62. A chart that applies independent claim 1 of the '592 patent to the accused AV80R™ Handheld portable GPS navigation system is attached to the Complaint as Exhibit 15.

63. A chart that applies independent claim 1 of the '951 patent to the accused AV80R™ Handheld portable GPS navigation system is attached to the Complaint as Exhibit 16.

64. To the extent that any of the asserted claims require products sold by Honeywell to be operated as a component of a vehicular system to satisfy all claim elements, on information and belief the accused products infringe both directly and indirectly.

65. On information and belief, Honeywell tests or operates the accused products in the United States by using them in automotive systems and thereby directly infringing any claim requiring such operation.

66. Honeywell has had notice of the asserted patents since before the filing of the this Complaint, or at a minimum, will receive notice of the asserted patents upon the filing of this Complaint.

67. Each of the accused products listed above are specifically designed to be used in a vehicle.

68. On information and belief, Honeywell knows about the asserted patents and actively induce infringement of the asserted claims of the asserted patents by designing their products to be capable of infringement and by promoting and encouraging the use of their products in ways that infringe the asserted claims.

VII. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE

69. Exemplary instances of importation and sale of infringing portable GPS systems are set forth below.

A. Garmin International, Inc. and Garmin Corp.

70. On February 24, 2009, representatives for Pioneer purchased an imported Garmin portable GPS system in the United States. Exhibit 17 to the Complaint includes a copy of the purchase receipt for this system, a Garmin Nüvi® 885T portable GPS navigation system, as well as a series of photographs of this navigation system and the packaging that contained it. The Garmin Nüvi® 885T unit identifies a country of origin designation of Taiwan. Exhibit 17C.

B. Honeywell International, Inc.

71. On February 3, 2009, representatives for Pioneer purchased an imported Honeywell portable GPS system in the United States. Exhibit 18 to the Complaint includes a copy of the purchase receipt for this system, a Honeywell AV80R™ Handheld portable GPS navigation system, as well as a series of photographs of this navigation system and the packaging that contained it. The Honeywell AV80R™ Handheld unit identifies a country of origin designation of China. Exhibit 18C.

VIII. HARMONIZED TARIFF SCHEDULE ITEM NUMBERS

72. On information and belief, the Harmonized Tariff Schedule of the United States item numbers under which the infringing Garmin and Honeywell portable GPS navigation systems or components thereof may be imported into the United States may be at least HTSUS

8526 and subsections thereof (including 8526.10.00) and 8529 and subsections thereof (including 8529.10.40, 8529.90.16, 8529.90.16.40, 8529.90.19.40, 8529.90.73.00, and 8529.90.95).

IX. RELATED LITIGATION

73. There has been no domestic court or agency litigation involving the patents asserted in this Complaint. A complaint alleging patent infringement has been filed by Pioneer against Garmin in Germany. The German action involves two patents. One of them, EP 0 775 892, claims priority to three Japanese applications, JP 31046/92, JP 74032/92 and JP 74033/92. The asserted '592 patent also claims priority to these Japanese applications.

X. THE DOMESTIC INDUSTRY

74. Pioneer has established a domestic industry under at least 19 U.S.C. § 1337(a)(3)(C).

75. Pioneer has long had an extensive in-house licensing capability that implements all necessary licensing functions for its intellectual property portfolio. Pioneer employs licensing professionals in Japan and the United States to work on projects involving Pioneer's extensive patent portfolio. These licensing professionals work alongside intellectual property counsel in evaluating licensing opportunities, including opportunities involving Pioneer's multimedia display and navigation system patent portfolio.

76. Pioneer USA has employed, and continues to employ, in-house licensing professionals and intellectual property counsel to assist with Pioneer's licensing efforts. For example, Discovision Associates has operated as a separate licensing entity within Pioneer for nearly 20 years. DVA developed the original optical videodisc format, which is generally known as the original Laser Disc. DVA continues today to license its patent portfolio, which numbers in the hundreds of patents, to both optical disk and optical disk player manufacturers.

77. Licensing professionals and intellectual property counsel from DVA and later Pioneer USA have been involved in activities directed to licensing Pioneer's multimedia display and navigation system patent portfolio, which also numbers in the hundreds of issued patents. Their efforts have included analyzing Pioneer's patent portfolio, analyzing multimedia display and navigation systems and products containing such systems of potential licensees, and meeting with potential licensees during licensing negotiations. Pioneer's licensing activities with respect to multimedia display and navigation systems date back to 2005 and continue today.

78. Pioneer USA has invested in personnel and resources to monitor the market, identify potential manufacturers and users of its patented multimedia display and navigation system technology, establish contacts with those potential manufacturers and users, provide pre-licensing technical analyses, and assist with license negotiations.

79. Pioneer continues to engage in licensing activities in order to expand this revenue stream, and has continued to make significant expenditures for purchases of potentially infringing products and other materials, analyses by Pioneer employees, employment of in-house and outside counsel, and communications and/or negotiations with potential licensees, including the proposed Respondent Garmin.

80. Pioneer USA's multimedia display and navigation system technology licensing efforts have included the '448, '592, and '951 patents.

81. Pioneer USA's investments in intellectual property and technology license operations attributable to domestic industry activities exploiting the '448, '592, and '951 patents are set forth in more detail in Confidential Exhibit 19. All of the licensees of the '448, '592, and '951 patents are listed in Confidential Exhibit 11.

XI. RELIEF REQUESTED

82. WHEREFORE, by reason of the foregoing, Complainant Pioneer respectfully requests that the United States International Trade Commission:

(a) Institute an immediate investigation, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337(a)(1)(B)(i) and (b)(1), with respect to violations of Section 337 based upon the importation, sale for importation, and sale after importation into the United States of multimedia display and navigation devices and systems, components thereof, and products containing the same that infringe one or more of the asserted claims of Pioneer's United States Letters Patent Nos. 5,365,448, 6,122,592, and 5,424,951;

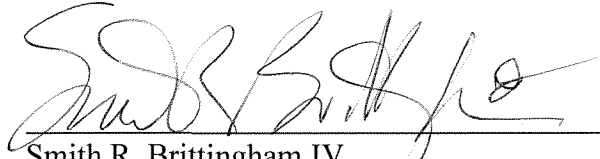
(b) Schedule and conduct a hearing on said unlawful acts and, following said hearing;

(c) Issue a permanent exclusion order pursuant to 19 U.S.C. § 1337(d)(1) barring from entry into the United States all infringing multimedia display and navigation devices and systems, components thereof, and products containing the same imported by or on behalf of any of the respondents;

(d) Issue a permanent cease and desist order, pursuant to 19 U.S.C. § 1337(f), directing each respondent to cease and desist from importing, marketing, advertising, demonstrating, warehousing inventory for distribution, offering for sale, selling, distributing, licensing, or using multimedia display and navigation devices and systems, components thereof, and products containing the same that infringe one or more claims of the asserted patents; and

(e) Grant such other and further relief as the Commission deems just and proper based on the facts determined by the Investigation and the authority of the Commission.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Smith R. Brittingham IV", written over a horizontal line.

Smith R. Brittingham IV

Eric J. Fues

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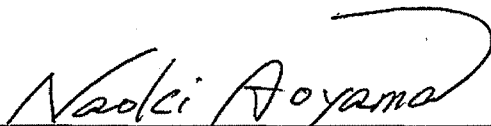
Tel. (404) 653-6400

VERIFICATION OF COMPLAINT

I, Naoki Aoyama, declare in accordance with 19 C.F.R. §§ 210.4 and 210.12(a), under penalty of perjury, that the following statements are true:

1. I am the General Manager in the Licensing Department, Intellectual Property Division, of Pioneer Corporation and am duly authorized to sign this Complaint on behalf of Pioneer;
2. I have read the foregoing Complaint;
3. To the best of my knowledge, information, and belief, based on reasonable inquiry, the foregoing Complaint is well-founded in fact and is warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;
4. The allegations and other factual contentions have evidentiary support or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and
5. The foregoing Complaint is not being filed for an improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

Executed on November 12, 2009



Naoki Aoyama