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December 16, 2021

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, SW
Room 112A
Washington, DC 20436

VIA EDIS

Re: *Certain Replacement Automotive Lamps, Inv. No. 337-TA-_____*

Dear Secretary Barton:

Enclosed for filing on behalf of Hyundai Motor Company and Hyundai Motor America, Inc. (collectively, “Hyundai” or “Complainants”) are a Complaint and related documents in support of Hyundai’s request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, against TYC Brother Industrial Co., Ltd., Genera Corporation, LKQ Corporation, and Keystone Automotive Industries, Inc. (collectively, the “Proposed Respondents”).

Pursuant to the temporary filing procedure under the Commission’s Temporary Change to Filing Procedures dated March 19, 2020, Hyundai submits the following documents for filing through the Commission’s Electronic Document Information System (EDIS):

1. Hyundai’s letter and certification requesting confidential treatment of the information contained in confidential Complaint and confidential Exhibits 7.01C, 7.02C, and 7.03C to the Complaint pursuant to 19 C.F.R. §§ 201.6(b) and 210.5(d);
2. Hyundai’s Public Interest Statement pursuant to 19 C.F.R. § 210.8(b);
3. Hyundai’s verified confidential Complaint pursuant to 19 C.F.R. §§ 210.8(a)(1)(ii) and 210.12(a);
4. Hyundai’s confidential Exhibits 7.01C, 7.02C, and 7.03C to the Complaint pursuant to 19 C.F.R. § 210.8(a)(1)(ii);
5. Hyundai’s public version of the verified confidential Complaint pursuant to 19 C.F.R. § 210.8(a)(1)(i); and

6. Hyundai's non-confidential Exhibits to the Complaint and public versions of confidential Exhibits 7.01C, 7.02C, and 7.03C to the Complaint pursuant to 19 C.F.R. § 210.8(a)(1)(i).

In addition, Hyundai is electronically filing the following materials pursuant to 19 C.F.R. § 210.12(c):

- A. Certified copies of the prosecution histories for U.S. Design Patent Nos. U.S. Design Patent No. D617,478, D618,835, D618,836, D631,583, D637,319, D640,812, D655,835, D664,690, D709,217, D736,436, D738,003, D739,057, D739,574, D740,980, D759,864, D759,865, D771,292, D780,351, D818,163, D829,947, and D834,225 ("Asserted Patents"), as Appendices A-U; and
- B. Copies of the patents and technical reference documents identified in the prosecution histories of the Asserted Patents, as Appendices A.1-U.1.

Thank you for your attention to this matter. Please contact the undersigned should you have any questions concerning this submission.

Respectfully submitted,



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Enclosures



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VIA EDIS

Re: *Certain Replacement Automotive Lamps, Inv. No. 337-TA-_____*

Dear Secretary Barton:

We are counsel for Complainants Hyundai Motor Company and Hyundai Motor America, Inc. (collectively, "Hyundai"). In accordance with Commission Rules 210.5(d) and 201.6, Hyundai requests confidential treatment of the information contained in the confidential Complaint and confidential Exhibits 7.01C, 7.02C, and 7.03C to the Complaint.

The information for which confidential treatment is sought involves proprietary and sensitive information regarding Hyundai's research, development, business operations, financial expenditures, and other similar information of commercial value.

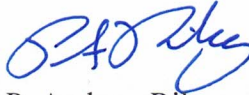
The information described above qualifies as confidential business information pursuant to Rule 201.6(a)(1) in that:

- a) it is not available to the public;
- b) unauthorized disclosure of such information could cause substantial harm to the competitive position of Hyundai; and/or
- c) the disclosure of the information could impair the Commission's ability to obtain information necessary to perform its statutory functions.

I certify that, to the best of my knowledge, information, and belief, founded after reasonable inquiry, information substantially identical to those contained in the confidential Complaint and confidential Exhibits 7.01C, 7.02C, and 7.03C is not reasonably available to the public.

I appreciate your attention to this matter. Please contact me with any questions you may have regarding the above.

Respectfully submitted,



P. Andrew Riley
MEI & MARK LLP
*Counsel for Complainants Hyundai Motor
Company and Hyundai Motor America, Inc.*

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

In the Matter of

CERTAIN REPLACEMENT
AUTOMOTIVE LAMPS

Investigation No. 337-TA-_____

**HYUNDAI MOTOR COMPANY AND HYUNDAI MOTOR AMERICA, INC.'S
STATEMENT ON THE PUBLIC INTEREST**

Pursuant to Commission Rule 210.8(b), Hyundai Motor Company and Hyundai Motor America, Inc. (collectively “Hyundai”) respectfully submit this Statement on the Public Interest in support of the concurrently filed Complaint.

Hyundai seeks exclusion of certain replacement automotive lamps (the “Accused Products”) that infringe Hyundai’s Asserted Patents, listed below.

Table 1- Listing of Hyundai's Asserted Patents

Asserted Patent	Exhibit No.
U.S. Design Patent No. D617,478 (“the ’478 Patent)	1.01
U.S. Design Patent No. D618,835 (“the ’8835 Patent)	1.02
U.S. Design Patent No. D618,836 (“the ’836 Patent)	1.03
U.S. Design Patent No. D631,583 (“the ’583 Patent)	1.04
U.S. Design Patent No. D637,319 (“the ’319 Patent)	1.05
U.S. Design Patent No. D640,812 (“the ’812 Patent)	1.06
U.S. Design Patent No. D655,835 (“the ’5835 Patent)	1.07
U.S. Design Patent No. D664,690 (“the ’690 Patent)	1.08
U.S. Design Patent No. D709,217 (“the ’217 Patent)	1.09
U.S. Design Patent No. D736,436 (“the ’436 Patent)	1.10
U.S. Design Patent No. D738,003 (“the ’003 Patent)	1.11
U.S. Design Patent No. D739,057 (“the ’057 Patent)	1.12
U.S. Design Patent No. D739,574 (“the ’574 Patent)	1.13
U.S. Design Patent No. D740,980 (“the ’980 Patent)	1.14
U.S. Design Patent No. D759,864 (“the ’864 Patent)	1.15
U.S. Design Patent No. D759,865 (“the ’865 Patent)	1.16

Asserted Patent	Exhibit No.
U.S. Design Patent No. D771,292 (“the ’292 Patent)	1.17
U.S. Design Patent No. D780,351 (“the ’351 Patent)	1.18
U.S. Design Patent No. D818,163 (“the ’163 Patent)	1.19
U.S. Design Patent No. D829,947 (“the ’947 Patent)	1.20
U.S. Design Patent No. D834,225 (“the ’225 Patent)	1.21

The proposed Respondents have unlawfully imported, sold for importation, and sold after importation the Accused Products. Hyundai also seeks all other remedies the Commission deems appropriate, including cease and desist orders prohibiting persons violating Section 337 to cease and desist sales related activities and importing.

The remedial orders requested would not have an adverse effect on the public health and welfare in the United States, competitive conditions in the United States economy, the production of like or directly competitive articles in the United States, or United States consumers. The remedial orders Hyundai requests would protect Hyundai’s investment in its U.S. automotive industry, promote clarity on the origin of replacement automotive lamps, and reduce customer confusion and parts related safety concerns. Hyundai is committed to serving the U.S. market. For example, Hyundai manufactures in the United States, the following Hyundai models that have automotive lamps covered by the Asserted Patents: Sonata (2011-19), Santa Fe (2010-17), and Elantra (2011-18). In addition, Hyundai regularly services and repairs Hyundai vehicles using genuine Hyundai automotive lamps throughout the United States.

Hyundai respectfully requests that the Commission *not* delegate fact finding on the public interest to the Administrative Law Judge in this Investigation because the proposed remedial orders will not adversely impact the public interest. Here, enforcement of Hyundai’s intellectual property rights and blocking unlawful trade practices would promote the public interest. The Commission recognizes the strong public interest in enforcing intellectual property rights.

Certain Baseband Processor Chips and Chipsets, Transmitter and Receiver (Radio) Chips, Power Control Chips, and Products Containing Same, Including Cellular Telephone Handsets, Inv. No. 337-TA-543, Comm’n Op. at 150 (June 19, 2007) (“Baseband Processor”).

The few prior instances where the Commission found the public interest outweighed enforcing intellectual property rights involved some important public health or welfare need, such as “energy efficient automobiles, basic scientific research, or hospital equipment.”

Spanston, Inc. v. Int’l Trade Comm’n, 629 F. 3d 1331, 1360 (Fed. Cir. 2010). The automotive lamps at issue here do not fall into any of these categories.

The remedial orders requested by Hyundai are not contrary to the public interest because: (1) the Accused Products infringe one or more of Hyundai’s Asserted Patents and are automotive lamps that are not necessary for any health or welfare need, (2) genuine U.S. Hyundai replacement automotive parts are readily available, and (3) the Accused Products are a small portion of the market and Hyundai and its authorized suppliers already manufacture automotive lamps and can satisfy market demand.

I. EXPLANATION OF HOW THE ARTICLES POTENTIALLY SUBJECT TO THE REQUESTED REMEDIAL ORDERS ARE USED IN THE UNITED STATES

The Accused Products are replacement automotive lamps (headlamps and taillamps) that infringe one or more of Hyundai’s Asserted Patents under 35 U.S.C. § 271. Starting in model year 2010, Hyundai has manufactured and sold vehicles with automotive lamps, and replacement automotive lamps, that practice the Asserted Patents.

The Accused Products are replacement or aftermarket automotive lamps sold to U.S. consumers that infringe one or more of the Asserted Patents. Proposed Respondents TYC Brother Industrial Co., Ltd., including its wholly-owned subsidiary, Genera Corporation (collectively, “TYC”), and LKQ Corporation, including LKQ’s wholly-owned subsidiary,

Keystone Automotive Industries, Inc. (collectively “LKQ”), sell for importation, import, and/or sell after importation, the Accused Products.

II. REQUESTED REMEDIAL ORDERS DO NOT RAISE ANY PUBLIC HEALTH, WELFARE, OR COMPETITION CONCERNS

The remedial orders requested by Hyundai would not adversely affect the public health and welfare in the United States. The imported Accused Products represent a small portion of the replacement automotive lamp market in the United States. If Accused Products were excluded from the United States, U.S. consumers would continue to have access to genuine Hyundai replacement automotive lamps. Hyundai is more than capable of supplying the market as Hyundai and its authorized suppliers are already meeting market demand for Hyundai replacement automotive lamps.

The Accused Products—automotive lamps—are not directly related to any public health, safety, or welfare concerns, such as medical devices, pharmaceuticals, or products related to national security. *See Certain Radio Control Hobby Transmitters and Receivers and Products Containing the Same*, Inv. No. 337-TA-757, Notice of Issuance of Limited Exclusion Order (Sept. 27, 2011). Should any of the Accused Products have a *de minimis* use in any applications impacting health, safety, or welfare, Hyundai can replace those infringing automotive lamps with genuine Hyundai replacement automotive lamps.

III. THE REQUESTED REMEDIAL ORDERS WOULD NOT NEGATIVELY IMPACT U.S. CONSUMERS

If Accused Products were excluded from the United States because of Hyundai’s requested remedial orders, U.S. consumers would continue to have access to genuine Hyundai replacement automotive lamps. Hyundai can supply the market for Hyundai replacement automotive lamps as Hyundai and its authorized suppliers are already meeting market demand and have the adequate capacity to increase manufacturing if necessary.

Hyundai manufactures automotive vehicles in the United States, and provides service and support after initial vehicle sales, that use automotive lamps protected by the Asserted Patents. In contrast, all of the Respondents' manufacturing takes place outside the United States, providing few, if any, American jobs. In addition, the Respondents' foreign manufacturing use unknown parts and unknown quality standards. The remedial orders requested here will increase American jobs, while removing low-quality automotive lamps from the United States economy.

IV. CONCLUSION

The reasons explained above, there are no public interest concerns that preclude the Commission from issuing the remedial orders requested by Hyundai.

Dated: December 16, 2021

Respectfully submitted,



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PUBLIC VERSION

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

In the Matter of

CERTAIN REPLACEMENT
AUTOMOTIVE LAMPS

Investigation No. 337-TA-_____

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

COMPLAINANTS

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LIST OF EXHIBITS

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1.01	Certified Copy of U.S. Design Patent No. D617,478
1.02	Certified Copy of U.S. Design Patent No. D618,835
1.03	Certified Copy of U.S. Design Patent No. D618,836
1.04	Certified Copy of U.S. Design Patent No. D631,583
1.05	Certified Copy of U.S. Design Patent No. D637,319
1.06	Certified Copy of U.S. Design Patent No. D640,812
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1.20	Certified Copy of U.S. Design Patent No. D829,947
1.21	Certified Copy of U.S. Design Patent No. D834,225
2.01	Certified Copy of Assignment of U.S. Design Patent No. D617,478 to Hyundai Motor Company
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3.01	Screenshots of TYC Brothers Industrial Co., Ltd.'s Relevant Webpages
3.02	TYC Brothers Industrial Co., Ltd.'s E-Catalog for Replacement Headlamps and Taillamps for Hyundai-branded Vehicles
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3.06	TYC Brothers Industrial Co., Ltd.'s Consolidated Financial Statements for Years 2019 and 2020
3.07	LKQ Corporation's SEC Form 10-K Annual Report for FY 2020
3.08	Keystone Automotive Industries, Inc.'s Statement of Information Filed at California Secretary of State
3.09	Screenshots of LKQ Corporation's Relevant Webpages
4.01	Infringement Claim Chart for U.S. Design Patent No. D617,478
4.02	Infringement Claim Chart for U.S. Design Patent No. D618,835
4.03	Infringement Claim Chart for U.S. Design Patent No. D618,836
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4.08	Infringement Claim Chart for U.S. Design Patent No. D664,690

PUBLIC VERSION

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4.21	Infringement Claim Chart for U.S. Design Patent No. D834,225
5.01	Printout of Website Page of Amazon.com Selling Exemplary Accused Product
5.02	Printout of Website Page of eBay Selling Exemplary Accused Product
5.03	Printout of Website Page of Walmart.com Selling Exemplary Accused Product
5.04	Printout of Website Page of Rockauto.com Selling Exemplary Accused Product
5.05	Printout of Website Page of LKQ Online Selling Exemplary Accused Product
5.06	Printouts of Product Description for TYC Part No. 20-9256-00-9
5.07	Printouts of Product Description for TYC Part No. 11-6347-00-9
5.08	Printouts of Product Description for TYC Part No. 11-6493-00-9
5.09	Printouts of Product Description for TYC Part No. 20-12361-00-9
5.10	Printouts of Product Description for TYC Part No. 20-9690-00-9
5.11	Printouts of Product Description for TYC Part No. 20-12551-00-9
5.12	Printouts of Product Description for TYC Part No. 20-12693-00-9
5.13	Printouts of Product Description for TYC Part No. 20-9377-00-9
5.14	Printouts of Product Description for TYC Part No. 20-9379-00-9
5.15	Printouts of Product Description for TYC Part No. 11-6721-00
5.16	Printouts of Product Description for TYC Part No. 20-9642-00-9
5.17	Printouts of Product Description for TYC Part No. 20-9640-00-9
5.18	Printouts of Product Description for TYC Part No. 11-6757-00-9
5.19	Printouts of Product Description for TYC Part No. 20-9595-00-9
5.20	Printouts of Product Description for TYC Part No. 17-5614-00-9
5.21	Printouts of Product Description for TYC Part No. 20-9746-90-9
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5.24	Printouts of Product Description for TYC Part No. 20-16343-00
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5.26	Printouts of Product Description for TYC Part No. 20-16569-00
5.27	Pictures of Product Packaging and Label of TYC Part No. 20-9256-00-9
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5.31	Pictures of Product Packaging and Label of TYC Part No. 20-9690-00-9

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5.38	Pictures of Product Packaging and Label of TYC Part No. 20-9640-00-9
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5.44	Pictures of Product Packaging and Label of TYC Part No. 11-6903-00-9
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5.46	Pictures of Product Packaging and Label of TYC Part No. 20-16159-00-9
5.47	Pictures of Product Packaging and Label of TYC Part No. 20-16569-00
5.48	Order Confirmation and Invoice for Purchase of Accused Products on June 18, 2021
5.49	Order Confirmation and Invoice for Purchase of Accused Products on August 12, 2021
5.50	Order Confirmation and Invoice for Purchase of Accused Products on August 27, 2021
5.51	Order Confirmation and Invoice for Purchase of Accused Products on September 9, 2021
5.52	Order Confirmation and Invoice for Purchase of Accused Products on September 15, 2021
5.53	Order Confirmation and Invoice for Purchase of Accused Products on September 16, 2021
5.54	Order Confirmation and Invoice for Purchase of Accused Products on September 21, 2021
5.55	Printouts of Product Description for LKQ Part No. HY2502157C
5.56	Printouts of Product Description for LKQ Part No. HY2805116C
5.57	Printouts of Product Description for LKQ Part No. HY2805117C
5.58	Printouts of Product Description for LKQ Part No. HY2503158C
5.59	Printouts of Product Description for LKQ Part No. HY2502177C
5.60	Printouts of Product Description for LKQ Part No. HY2503161C
5.61	Printouts of Product Description for LKQ Part No. HY2503163C
5.62	Printouts of Product Description for LKQ Part No. HY2503173C
5.63	Printouts of Product Description for LKQ Part No. HY2503169C
5.64	Printouts of Product Description for LKQ Part No. HY2805129C
5.65	Printouts of Product Description for LKQ Part No. HY2502186C
5.66	Printouts of Product Description for LKQ Part No. HY2502187C
5.67	Printouts of Product Description for LKQ Part No. HY2805131C
5.68	Printouts of Product Description for LKQ Part No. HY2503183C

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5.69	Printouts of Product Description for LKQ Part No. HY2802135C
5.70	Printouts of Product Description for LKQ Part No. HY2502199C
5.71	Printouts of Product Description for LKQ Part No. HY2503206C
5.72	Printouts of Product Description for LKQ Part No. HY2805142C
5.73	Printouts of Product Description for LKQ Part No. HY2503218
5.74	Printouts of Product Description for LKQ Part No. HY2503217C
5.75	Printouts of Product Description for LKQ Part No. HY2503223
6.01	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D617,478
6.02	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D618,835
6.03	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D618,836
6.04	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D631,583
6.05	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D637,319
6.06	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D640,812
6.07	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D655,835
6.08	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D664,690
6.09	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D709,217
6.10	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D736,436
6.11	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D738,003
6.12	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D739,057
6.13	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D739,574
6.14	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D740,980
6.15	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D759,864
6.16	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D759,865
6.17	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D771,292
6.18	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D780,351

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Exhibit No.	Description
6.19	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D818,163
6.20	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D829,947
6.21	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D834,225
7.01C	Confidential Declaration of James Carter at Hyundai Motor America, Inc.
7.02C	Confidential Declaration of Seokjoon Hong at Hyundai America Technical Center, Inc.
7.03C	Confidential Declaration of Samuel Sohn at Mobis Parts America LLC

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LIST OF PHYSICAL EXHIBITS¹

Exhibit No.	Description
Phys. Ex. 1	TYC Brothers Industrial Co., Ltd.'s and LKQ Corporation's Accused Product (TYC Part No. 11-6903-00-9; LKQ Part No. HY2805142C) That Infringes U.S. Design Patent No. D780,351
Phys. Ex. 2	Hyundai's Domestic Industry Product (Hyundai Part No. 92402F2020) That Practices U.S. Design Patent No. D780,351
Phys. Ex. 3	TYC Brothers Industrial Co., Ltd.'s and LKQ Corporation's Accused Product (TYC Part No. 20-16343-00; LKQ Part No. HY2503218) That Infringes U.S. Design Patent No. D818,163
Phys. Ex. 4	Hyundai's Domestic Industry Product (Hyundai Part No. 92101J0020) That Practices U.S. Design Patent No. D818,163
Phys. Ex. 5	TYC Brothers Industrial Co., Ltd.'s and LKQ Corporation's Accused Product (TYC Part No. 20-16159-00-9; LKQ Part No. HY2503217C) That Infringes U.S. Design Patent No. D829,947
Phys. Ex. 6	Hyundai's Domestic Industry Product (Hyundai Part No. 92102C2500) That Practices U.S. Design Patent No. D829,947
Phys. Ex. 7	TYC Brothers Industrial Co., Ltd.'s and LKQ Corporation's Accused Product (TYC Part No. 20-16569-00; LKQ Part No. HY2503223) That Infringes U.S. Design Patent No. D834,225
Phys. Ex. 8	Hyundai's Domestic Industry Product (Hyundai Part No. 92102J9020) That Practices U.S. Design Patent No. D834,225

¹ Complainants understand that the Commission is currently not accepting the submission of physical exhibits in light of the global COVID-19 pandemic. Accordingly, Complainants provide a placeholder listing herein for several exemplary exhibits that can be immediately submitted to the Commission upon request. Complaints also note that, upon request by the Commission, Complainants are able to submit as physical exhibits, within a reasonable period of time, any other accused infringing products in their possession and any of Complainants products.

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LIST OF APPENDICES

Appendix No.	Description
A	Certified Copy of File History of U.S. Design Patent No. D617,478
A.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D617,478
B	Certified Copy of File History of U.S. Design Patent No. D618,835
B.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D618,835
C	Certified Copy of File History of U.S. Design Patent No. D618,836
C.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D618,836
D	Certified Copy of File History of U.S. Design Patent No. D631,583
D.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D631,583
E	Certified Copy of File History of U.S. Design Patent No. D637,319
E.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D637,319
F	Certified Copy of File History of U.S. Design Patent No. D640,812
F.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D640,812
G	Certified Copy of File History of U.S. Design Patent No. D655,835
G.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D655,835
H	Certified Copy of File History of U.S. Design Patent No. D664,690
H.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D664,690
I	Certified Copy of File History of U.S. Design Patent No. D709,217
I.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D709,217
J	Certified Copy of File History of U.S. Design Patent No. D736,436
J.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D736,436
K	Certified Copy of File History of U.S. Design Patent No. D738,003
K.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D738,003
L	Certified Copy of File History of U.S. Design Patent No. D739,057
L.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D739,057
M	Certified Copy of File History of U.S. Design Patent No. D739,574
M.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D739,574
N	Certified Copy of File History of U.S. Design Patent No. D740,980

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Appendix No.	Description
N.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D740,980
O	Certified Copy of File History of U.S. Design Patent No. D759,864
O.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D759,864
P	Certified Copy of File History of U.S. Design Patent No. D759,865
P.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D759,865
Q	Certified Copy of File History of U.S. Design Patent No. D771,292
Q.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D771,292
R	Certified Copy of File History of U.S. Design Patent No. D780,351
R.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D780,351
S	Certified Copy of File History of U.S. Design Patent No. D818,163
S.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D818,163
T	Certified Copy of File History of U.S. Design Patent No. D829,947
T.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D829,947
U	Certified Copy of File History of U.S. Design Patent No. D834,225
U.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D834,225

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I. INTRODUCTION

1. Complainants Hyundai Motor Company and Hyundai Motor America, Inc. (collectively referred to where appropriate as “Hyundai” or “Complainants”) request that the United States International Trade Commission (“Commission” or “ITC”) institute an investigation under Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 (“Section 337”), based on the unlawful importation into the United States, sale for importation into the United States, and/or sale within the United States after importation, of certain replacement automotive parts by TYC Brother Industrial Co., Ltd., including its wholly-owned subsidiary, Genera Corporation, and LKQ Corporation, including LKQ’s wholly-owned subsidiary, Keystone Automotive Industries, Inc., that infringe one or more of Hyundai’s design patents listed in Table 1 below (“Asserted Patents”):

Table 1- Listing of Hyundai's Asserted Patents

Asserted Patent	Exhibit No.
U.S. Design Patent No. D617,478 (“the ’478 Patent)	1.01
U.S. Design Patent No. D618,835 (“the ’8835 Patent)	1.02
U.S. Design Patent No. D618,836 (“the ’836 Patent)	1.03
U.S. Design Patent No. D631,583 (“the ’583 Patent)	1.04
U.S. Design Patent No. D637,319 (“the ’319 Patent)	1.05
U.S. Design Patent No. D640,812 (“the ’812 Patent)	1.06
U.S. Design Patent No. D655,835 (“the ’5835 Patent)	1.07
U.S. Design Patent No. D664,690 (“the ’690 Patent)	1.08
U.S. Design Patent No. D709,217 (“the ’217 Patent)	1.09
U.S. Design Patent No. D736,436 (“the ’436 Patent)	1.10
U.S. Design Patent No. D738,003 (“the ’003 Patent)	1.11
U.S. Design Patent No. D739,057 (“the ’057 Patent)	1.12
U.S. Design Patent No. D739,574 (“the ’574 Patent)	1.13
U.S. Design Patent No. D740,980 (“the ’980 Patent)	1.14
U.S. Design Patent No. D759,864 (“the ’864 Patent)	1.15
U.S. Design Patent No. D759,865 (“the ’865 Patent)	1.16
U.S. Design Patent No. D771,292 (“the ’292 Patent)	1.17

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Asserted Patent	Exhibit No.
U.S. Design Patent No. D780,351 (“the ’351 Patent)	1.18
U.S. Design Patent No. D818,163 (“the ’163 Patent)	1.19
U.S. Design Patent No. D829,947 (“the ’947 Patent)	1.20
U.S. Design Patent No. D834,225 (“the ’225 Patent)	1.21

2. Hyundai is an innovative, world-renowned company that manufactures, sells and distributes Hyundai branded automobiles and parts throughout the United States and around the world.

3. Hyundai’s automobile designers spend years designing the individual look of their vehicles, including the distinctive headlamps and taillamps for those vehicles. Hyundai carefully and skillfully designs its headlamps and taillamps to appeal to customers and to advance the core philosophy embodied in each vehicle. Given the importance of the ornamental design to the sale of automobiles, Hyundai invests heavily in the ornamental design of its products, and protects those ornamental designs through design patents. And the same applies with respect to the designs for its distinctive headlamps and taillamps for its vehicles.

4. Hyundai’s achievements in automobile design have resulted in worldwide success and broad intellectual property protection for its innovations, including the patented designs at issue here. Because of its success, unscrupulous replacement parts vendors attempt to capitalize on that success by imitating Hyundai’s non-functional elegant and distinctive product design to manufacture replacement parts, including automobile headlamps and taillamps, which often require replacement following a collision.

5. One such imitator is TYC Brother Industrial Co., Ltd., who, together with its subsidiary Genera Corporation, have slavishly copied Hyundai’s elegant and distinctive headlamp and taillamp designs, unlawfully imported or sold for importation into the United States, and/or sold within the United States after importation replacement automotive headlamps

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and taillamps that infringe the Asserted Patents, in violation of Hyundai's valuable intellectual property rights. Another principal infringer of Hyundai's intellectual property rights is LKQ Corporation, who, together with its subsidiary Keystone Automotive Industries, Inc., have unlawfully imported into the United States, sold for importation into the United States, and/or sold within the United States after importation replacement automotive headlamps and taillamps that infringe the Asserted Patents.

6. Hyundai seeks as relief a limited exclusion order excluding the importation of all replacement headlamp and taillamps imported, sold for importation, and/or sold after importation, by or on behalf of, each of the Respondents that infringe on the Hyundai's Asserted Patents.

7. Hyundai also seeks as relief a cease and desist order against Respondents directing each of the Respondents to immediately cease the importation into the United States, sale for importation into the United States, and sale in the United States after importation of the replacement headlamps and taillamps that infringe the Asserted Patents. Hyundai also requests that the cease and desist order direct each of the Respondents to cease the demonstration, sale, offer for sale, advertising, solicitation, or transfer (other than for exportation) of any imported infringing headlamps and taillamps immediately.

8. Hyundai also seeks the imposition of a bond upon importation of any infringing headlamps and taillamps during the Presidential review period.

II. THE COMPLAINANTS

A. Hyundai Motor Company

9. Hyundai Motor Company ("HMC") is a Korean company, located in Seoul, Republic of Korea. HMC manufactures or has others manufacture for HMC and distributes

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Hyundai-branded automobiles and replacement parts through its authorized chain of distribution in the United States and around the world.

10. HMC is the owner of the Asserted Patents that cover certain headlamp and taillamp designs deployed across the Hyundai-branded line of automobiles.

B. Hyundai Motor America, Inc.

11. Hyundai Motor America, Inc. (“HMA”) is a corporation duly organized and existing under the laws of the State of California, with its principal place of business located in Fountain Valley, California.

12. HMA is a wholly owned subsidiary of HMC and is the exclusive distributor of the Hyundai-branded automobiles and automobile parts and accessories in the United States. HMA has the right to enforce those rights and/or sub-license those rights to dealers, distributors, and others. HMA only sources replacement parts through Hyundai’s authorized chain of distribution for the United States, and only those parts sourced through that authorized chain of distribution are Hyundai Genuine Parts.

III. THE PROPOSED RESPONDENTS

A. The TYC Respondents

13. On information and belief, Respondent TYC Brothers Industrial Co., Ltd. (“TYC Brothers”) is a Taiwanese corporation principally engaged in the design, manufacture, and sale of replacement vehicle lamps and other automobile parts, with a principal place of business located in Tainan, Taiwan. Exhibit 3.01. TYC Brothers imports into the United States, sells for importation, and/or sells in the United States after importation replacement automotive headlamps and taillamps that infringe the Asserted Patents. Exhibits 3.02-3.03.

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14. On information and belief, Respondent Genera Corporation (“Genera”) is a wholly owned subsidiary of TYC Brothers, which is duly organized and existing under the laws of the state of California, with its principal place of business located in Brea, California. Exhibits 3.04-3.06. On information and belief, Genera is the exclusive distributor for TYC Brothers’ products, including the infringing headlamps and taillamps, in the United States. Exhibit 3.01. Upon information and belief, Genera imports into the United States, sells for importation, and/or sells in the United States after importation replacement automotive headlamps and taillamps that infringe the Asserted Patents. Exhibit 3.04. TYC Brothers and Genera are collectively referred to where appropriate as “TYC” or “the TYC Respondents.”

B. The LKQ Respondents

15. On information and belief, LKQ Corporation (“LKQ Corp.”) is a company organized and existing under the laws of the state of Delaware with its principal place of business located in Chicago, Illinois. Exhibit 3.07. On information and belief, LKQ Corp. imports into the United States, sells for importation, and/or sells in the United States after importation replacement automotive headlamps and taillamps that infringe the Asserted Patents. Exhibit 3.07 (*see, e.g., page 6*, “[w]e purchased approximately 42% of our aftermarket products in 2020 directly from manufacturers in Taiwan and other Asian countries. Approximately 55% of our aftermarket products were purchased from vendors located in the U.S.; however, we believe the majority of these products were manufactured in Taiwan, Mexico or other foreign countries.”). On information and belief, the infringing headlamps and taillamps include those manufactured by the TYC Respondents and/or other third party manufacturers and bear either the LKQ Corp.’s own brand names such as “Keystone” or the brand names of the manufacturers such as “TYC.”

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16. On information and belief, Keystone Automotive Industries, Inc. (“Keystone”) is a subsidiary of LKQ Corp., which is organized and existing under the state of California with its principal place of business located in Chicago, Illinois. Exhibit 3.08-3.09. On information and belief, Keystone is a distribution arm of LKQ Corp. and claims to be the largest aftermarket auto parts supplier in the United States. Exhibit 3.09. On information and belief, Keystone, either alone or in concert with LKQ Corp., imports into the United States, sells for importation, and/or sells in the United States after importation replacement automotive headlamps and taillamps that infringe the Asserted Patents. Exhibit 3.07. LKQ and Keystone are collectively referred to where appropriate as “LKQ” or “the LKQ Respondents.”

IV. THE PRODUCTS AT ISSUE

17. The categories of products accused in this Complaint are certain automotive headlamps and taillamps. Pursuant to 19 C.F.R. § 210.12(a)(12), a clear statement in plain English of the category of products accused in this Complaint is “replacement automotive headlamps and taillamps for certain Hyundai-branded automobiles.”

18. The Accused Products are knockoff automotive headlamps and taillamps intended to replace certain original headlamps and taillamps equipped in certain Hyundai automobiles. Table 2 below summarizes Hyundai’s original, genuine headlamps and taillamps protected by one or more of the Asserted Patents (“Hyundai’s Genuine Parts”). The Respondents’ knockoff automotive headlamps and taillamps slavishly copied the elegant and distinctive designs of Hyundai’s Genuine Parts in violation of Hyundai’s patent rights.

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Table 2 – Summary of Hyundai’s Exemplary Genuine Parts Protected by Asserted Patents

Asserted Patent	Hyundai Model	Model Year	Part Description	Exemplary Hyundai’s Genuine Parts
The ’478 Patent	Sonata	2011-14	Headlamp	921013Q000 921013Q100 921023Q000 921023Q100
The ’8835 Patent	Sonata	2011-14	Taillamp	924023Q000 924013Q000
The ’836 Patent	Santa Fe	2010-12	Taillamp	924020W500 924010W500
The ’583 Patent	Tucson	2010-13	Headlamp	921022S050 921012S050
The ’319 Patent	Sonata	2011-15	Headlamp	921024R050 921014R050
The ’812 Patent	Elantra	2011-13	Headlamp	921023Y000 921013Y000
The ’5835 Patent	Accent	2012-14	Headlamp	921021R010 921011R010
The ’690 Patent	Elantra	2012-16	Headlamp	92101A5050 92102A5050
The ’217 Patent	Santa Fe	2013-17	Headlamp	921014Z000 921014Z010 921014Z100 921024Z000 921024Z010 921024Z100
The ’436 Patent	Sonata	2015-17	Taillamp	92402C2000 92401C2000
The ’003 Patent	Elantra	2014-16	Headlamp	921013Y510 921023Y510
The ’057 Patent	Elantra	2014-16	Headlamp	921013X280 921023X280 921013Y500 921023Y500
The ’574 Patent	Elantra	2014-16	Taillamp	924023X230 924013X230 924023Y500 924013Y500
The ’980 Patent	Sonata	2015-17	Headlamp	92101C2000 92101C2050 92102C2000 92102C2050
The ’864 Patent	Tucson	2016-18	Taillamp	92404D3010 92403D3010

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Asserted Patent	Hyundai Model	Model Year	Part Description	Exemplary Hyundai's Genuine Parts
The '865 Patent	Tucson	2016-18	Headlamp	92102D3050 92101D3050
The '292 Patent	Elantra	2017-18	Headlamp	92102F3000 92102F3010 92101F3000 92101F3010
The '351 Patent	Elantra	2017-18	Taillamp	92401F2020 92402F2020
The '163 Patent	Accent	2018-21	Headlamp	92102J0020 92101J0020
The '947 Patent	Sonata	2017-19	Headlamp	92102C2500 92101C2500
The '225 Patent	Kona	2018-20	Headlamp	92102J9020 92101J9020

V. THE ASSERTED PATENTS

A. The '478 Patent

19. The '478 Patent, entitled "Head Lamp for Automobiles," issued to HMC on June 8, 2010, from U.S. Design Patent Application No. 29/351,182, filed December 1, 2009.

The '478 Patent lists Byeong-Ho Jeong and Jae-Uk Cho as inventors. A certified copy of the '478 Patent is attached to the Complaint as Exhibit 1.01.

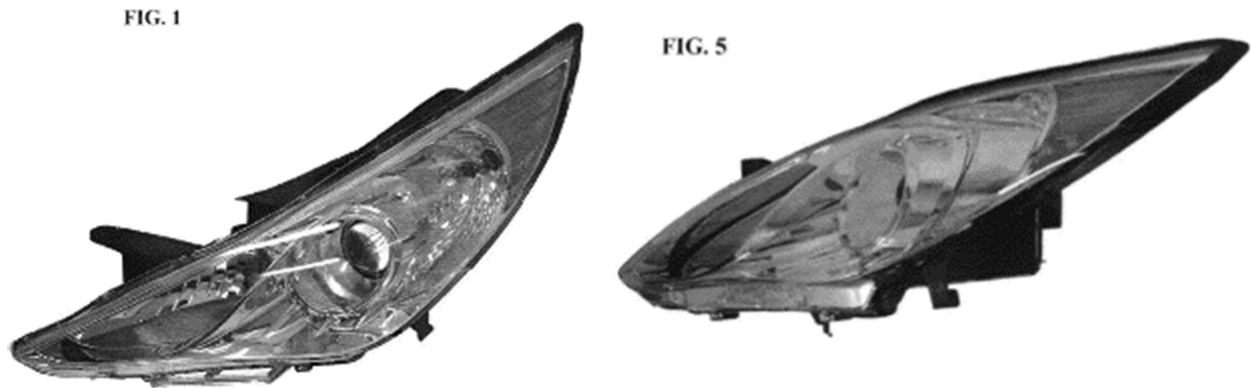
20. The '478 Patent remains in full force and effect and expires on June 8, 2024. HMC is the owner of all right, title, and interest in and to the '478 Patent. A certified copy of the relevant assignment for the '478 Patent is attached to the Complaint as Exhibit 2.01.

21. Together with this Complaint, a certified copy of the prosecution history of the '478 Patent is attached as Appendix A, with a copy of the references cited in the prosecution history attached as Appendix A.1.

22. The '478 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '478 Patent. The '478 Patent has seven figures,

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showing the ornamental design features from various viewpoints. Figures 1 and 5, reproduced below, are exemplary:



23. To the best of Hyundai's knowledge, information, and belief, there are no foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '478 Patent.

B. The '8835 Patent

24. The '8835 Patent, entitled "Rear Combination Lamp for Automobiles," issued to HMC on June 29, 2010, from U.S. Design Patent Application No. 29/351,194, filed December 1, 2009. The '8835 Patent lists Byeong-Ho Jeong and Jae-Uk Cho as inventors. A certified copy of the '8835 Patent is attached to the Complaint as Exhibit 1.02.

25. The '8835 Patent remains in full force and effect and expires on June 29, 2024. HMC is the owner of all right, title, and interest in and to the '8835 Patent. A certified copy of the relevant assignment for the '8835 Patent is attached to the Complaint as Exhibit 2.02.

26. Together with this Complaint, a certified copy of the prosecution history of the '8835 Patent is attached as Appendix B, with a copy of the references cited in the prosecution history attached as Appendix B.1.

PUBLIC VERSION

27. The '8835 Patent is directed to specific ornamental design features for a rear combination lamp for automobiles, as shown and described in the '8835 Patent. The '8835 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:



FIG. 1



FIG. 2

28. To the best of Hyundai's knowledge, information, and belief, there are no foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '8835 Patent.

C. The '836 Patent

29. The '836 Patent, entitled "Rear Combination Lamp for Automobiles," issued to HMC on June 29, 2010, from U.S. Design Patent Application No. 29/351,850, filed December 11, 2009. The '836 Patent lists Sung Hwan Shim and Jung Woo Sa as inventors. A certified copy of the '836 Patent is attached to the Complaint as Exhibit 1.03.

30. The '836 Patent remains in full force and effect and expires on June 29, 2024. HMC is the owner of all right, title, and interest in and to the '836 Patent. A certified copy of the relevant assignment for the '836 Patent is attached to the Complaint as Exhibit 2.03.

PUBLIC VERSION

31. Together with this Complaint, a certified copy of the prosecution history of the '836 Patent is attached as Appendix C, with a copy of the references cited in the prosecution history attached as Appendix C.1.

32. The '836 Patent is directed to specific ornamental design features for a rear combination lamp for automobiles, as shown and described in the '836 Patent. The '836 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

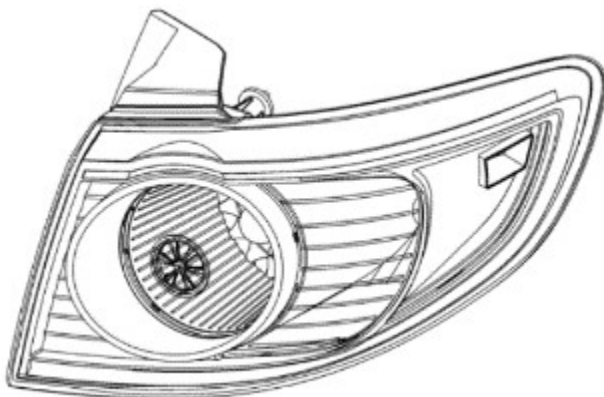
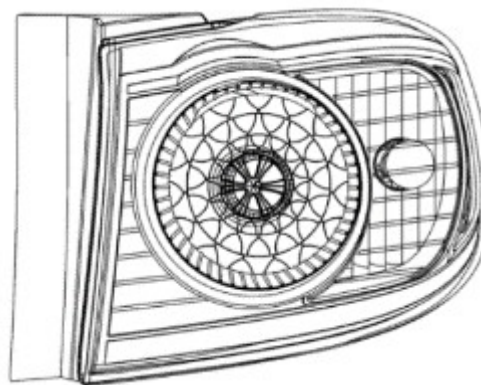


Fig. 2



33. A list of foreign counterpart patents and/or applications to the '836 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '836 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-0566316	Issued	30-2009-0025864
CN	ZL200930205359.2	Expired	200930205359.2
EP	01605353-0001	Issued	001605353

PUBLIC VERSION

D. The '583 Patent

34. The '583 Patent, entitled "Head Lamp for Automobiles," issued to HMC on January 25, 2011, from U.S. Design Patent Application No. 29/351,108, filed November 30, 2009. The '583 Patent lists Dong-jin Park and Dai-Sung Kim as inventors. A certified copy of the '583 Patent is attached to the Complaint as Exhibit 1.04.

35. The '583 Patent remains in full force and effect and expires on January 25, 2025. HMC is the owner of all right, title, and interest in and to the '583 Patent. A certified copy of the relevant assignment for the '583 Patent is attached to the Complaint as Exhibit 2.04.

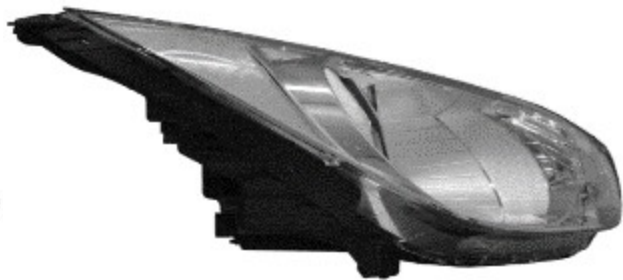
36. Together with this Complaint, a certified copy of the prosecution history of the '583 Patent is attached as Appendix D, with a copy of the references cited in the prosecution history attached as Appendix D.1.

37. The '583 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '583 Patent. The '583 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:

Fig. 1



Fig. 4



38. A list of foreign counterpart patents and/or applications to the '583 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there

PUBLIC VERSION

are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '583 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	200930190147.1	Expired	ZL200930190147.1
KR	30-2009-0032442	Issued	30-0569137

E. The '319 Patent

39. The '319 Patent, entitled "Head Lamp for Automobiles," issued to HMC on May 3, 2011, from U.S. Design Patent Application No. 29/362,580, filed May 27, 2010. The '319 Patent lists Byeong-Ho Jeong and Yun-Soo Bae as inventors. A certified copy of the '319 Patent is attached to the Complaint as Exhibit 1.05.

40. The '319 Patent remains in full force and effect and expires on May 3, 2025. HMC is the owner of all right, title, and interest in and to the '319 Patent. A certified copy of the relevant assignment for the '319 Patent is attached to the Complaint as Exhibit 2.05.

41. Together with this Complaint, a certified copy of the prosecution history of the '319 Patent is attached as Appendix E, with a copy of the references cited in the prosecution history attached as Appendix E.1.

42. The '319 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '319 Patent. The '319 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:

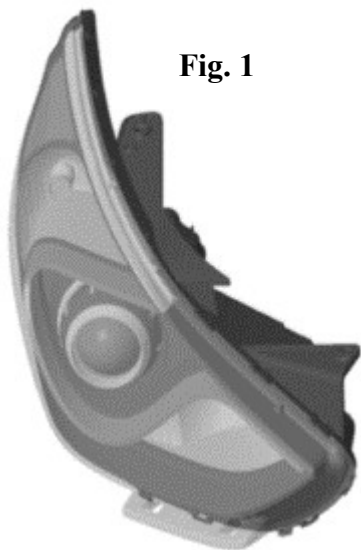


Fig. 1

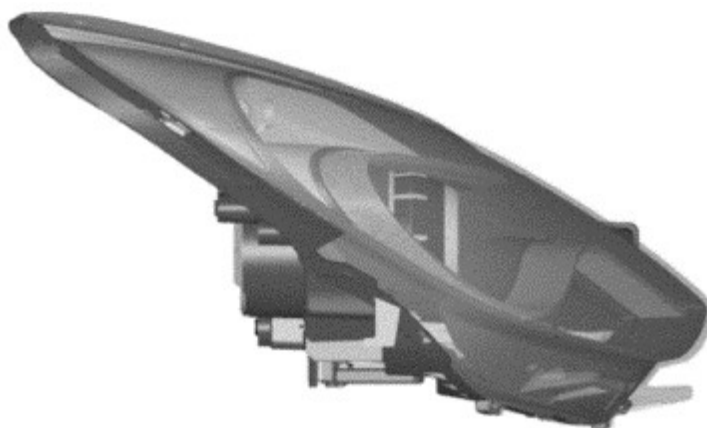


Fig. 4

43. A list of foreign counterpart patents and/or applications to the '319 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '319 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201030200090.1	Expired	ZL201030200090.1
KR	30-2010-0013545	Issued	30-0604833

F. The '812 Patent

44. The '812 Patent, entitled "Head Lamp for Automobiles," issued to HMC on June 28, 2011, from U.S. Design Patent Application No. 29/372,200, filed October 26, 2010. The '812 Patent lists Jae-Uk Cho and Jik-Soo Shin as inventors. A certified copy of the '812 Patent is attached to the Complaint as Exhibit 1.06.

45. The '812 Patent remains in full force and effect and expires on June 28, 2025. HMC is the owner of all right, title, and interest in and to the '812 Patent. A certified copy of the relevant assignment for the '812 Patent is attached to the Complaint as Exhibit 2.06.

PUBLIC VERSION

46. Together with this Complaint, a certified copy of the prosecution history of the '812 Patent is attached as Appendix F, with a copy of the references cited in the prosecution history attached as Appendix F.1.

47. The '812 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '812 Patent. The '812 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:



48. A list of foreign counterpart patents and/or applications to the '812 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '812 Patent.

Country	Application No.	Status	Patent/Publication No.
EP	001770330	Issued	001770330-0001
KR	30-2010-0018404	Issued	30-0601998-0001

G. The '5835 Patent

49. The '5835 Patent, entitled "Head Lamp for Automobiles," issued to HMC on March 13, 2012, from U.S. Design Patent Application No. 29/372,023, filed October 5, 2010. The '5835 Patent lists Sung-Ho Park and Jae-Uk Cho as inventors. A certified copy of the '5835 Patent is attached to the Complaint as Exhibit 1.07.

PUBLIC VERSION

50. The '5835 Patent remains in full force and effect and expires on March 13, 2026. HMC is the owner of all right, title, and interest in and to the '5835 Patent. A certified copy of the relevant assignment for the '5835 Patent is attached to the Complaint as Exhibit 2.07.

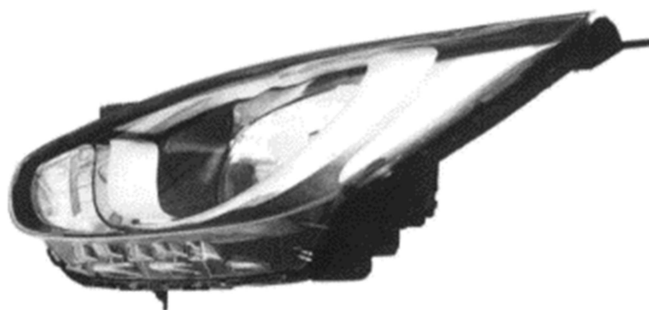
51. Together with this Complaint, a certified copy of the prosecution history of the '5835 Patent is attached as Appendix G, with a copy of the references cited in the prosecution history attached as Appendix G.1.

52. The '5835 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '5835 Patent. The '5835 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:

Fig. 1



Fig. 4



53. A list of foreign counterpart patents and/or applications to the '5835 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '5835 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201130021730.7	Expired	ZL201130021730.7
EP	001817255	Issued	001817255-0001
KR	30-2010-0035711	Issued	30-0628031

PUBLIC VERSION

H. The '690 Patent

54. The '690 Patent, entitled "Headlamp for an Automobile," issued to HMC on July 31, 2012, from U.S. Design Patent Application No. 29/374,902, filed October 21, 2011.

The '690 Patent lists Jae Hong Kim and Pil Joong Ham as inventors. A certified copy of the '690 Patent is attached to the Complaint as Exhibit 1.08.

55. The '690 Patent remains in full force and effect and expires on July 31, 2026. HMC is the owner of all right, title, and interest in and to the '690 Patent. A certified copy of the relevant assignment for the '690 Patent is attached to the Complaint as Exhibit 2.08.

56. Together with this Complaint, a certified copy of the prosecution history of the '690 Patent is attached as Appendix H, with a copy of the references cited in the prosecution history attached as Appendix H.1.

57. The '690 Patent is directed to specific ornamental design features for a headlamp for an automobile, as shown and described in the '690 Patent. The '690 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:



58. A list of foreign counterpart patents and/or applications to the '690 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there

PUBLIC VERSION

are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '690 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201130357678.2	Issued	ZL201130357678.2
EP	001924184	Issued	001924184-0001
KR	30-2011-0031765	Issued	30-0658641

I. The '217 Patent

59. The '217 Patent, entitled “Head Lamp for Automobiles,” issued to HMC on July 15, 2014, from U.S. Design Patent Application No. 29/421,055, filed May 10, 2012. The '217 Patent lists Sung No Kim and Ju Whan Moon as inventors. A certified copy of the '217 Patent is attached to the Complaint as Exhibit 1.09.

60. The '217 Patent remains in full force and effect and expires on July 15, 2028. HMC is the owner of all right, title, and interest in and to the '217 Patent. A certified copy of the relevant assignment for the '217 Patent is attached to the Complaint as Exhibit 2.09.

61. Together with this Complaint, a certified copy of the prosecution history of the '217 Patent is attached as Appendix I, with a copy of the references cited in the prosecution history attached as Appendix I.1.

62. The '217 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '217 Patent. The '217 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:

PUBLIC VERSION



63. A list of foreign counterpart patents and/or applications to the '217 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '217 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201230121798.7	Issued	ZL201230121798.7
EP	002030072	Issued	002030072-0001
KR	30-2012-0012021	Issued	30-0688034

J. The '436 Patent

64. The '436 Patent, entitled "Rear Combination Lamp for Automobiles," issued to HMC on August 11, 2015, from U.S. Design Patent Application No. 29/474,245, filed July 18, 2014. The '436 Patent lists Dong-jin Park and Dai-Sung Kim as inventors. A certified copy of the '436 Patent is attached to the Complaint as Exhibit 1.10.

65. The '436 Patent remains in full force and effect and expires on August 11, 2029. HMC is the owner of all right, title, and interest in and to the '436 Patent. A certified copy of the relevant assignment for the '436 Patent is attached to the Complaint as Exhibit 2.10.

66. Together with this Complaint, a certified copy of the prosecution history of the '436 Patent is attached as Appendix J, with a copy of the references cited in the prosecution history attached as Appendix J.1.

PUBLIC VERSION

67. The '436 Patent is directed to specific ornamental design features for a rear combination lamp for automobiles, as shown and described in the '436 Patent. The '436 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

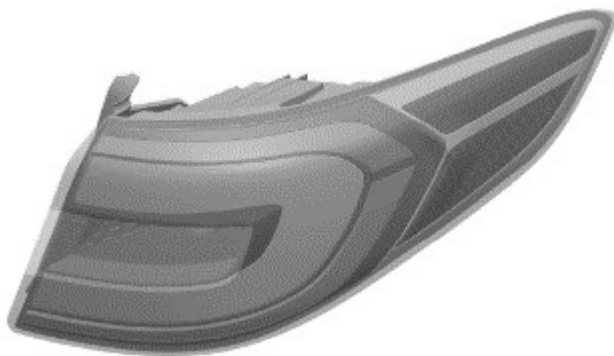


Fig. 2



68. A list of foreign counterpart patents and/or applications to the '436 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '436 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201430093900.6	Issued	ZL201430093900.6
KR	30-2014-0007778	Issued	30-0760934

K. The '003 Patent

69. The '003 Patent, entitled "Head Lamp for Automobiles," issued to HMC on September 1, 2015, from U.S. Design Patent Application No. 29/463,591, filed January 9, 2014. The '003 Patent lists Sung-Ho Park and Seung-Tack Hong as inventors. A certified copy of the '003 Patent is attached to the Complaint as Exhibit 1.11.

PUBLIC VERSION

70. The '003 Patent remains in full force and effect and expires on September 1, 2029. HMC is the owner of all right, title, and interest in and to the '003 Patent. A certified copy of the relevant assignment for the '003 Patent is attached to the Complaint as Exhibit 2.11.

71. Together with this Complaint, a certified copy of the prosecution history of the '003 Patent is attached as Appendix K, with a copy of the references cited in the prosecution history attached as Appendix K.1.

72. The '003 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '003 Patent. The '003 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

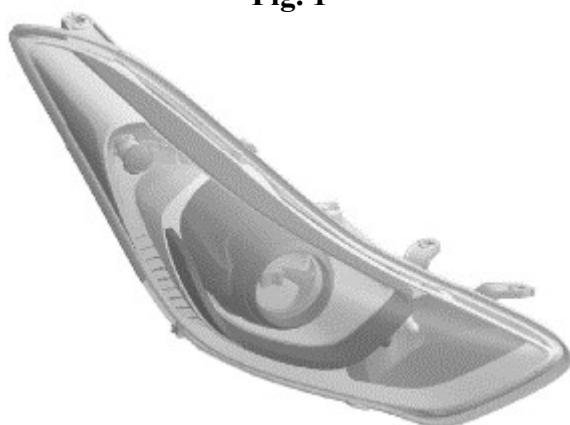
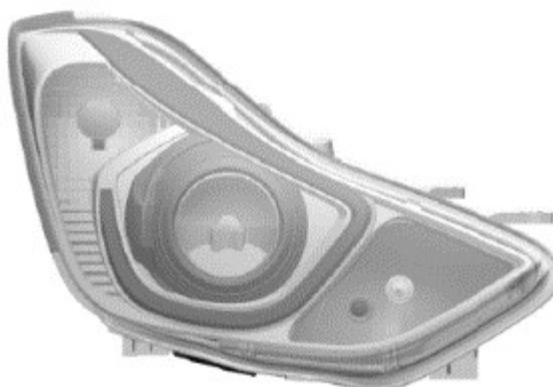


Fig. 2



73. A list of foreign counterpart patents and/or applications to the '003 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '003 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201330634936.6	Issued	ZL201330634936.6
EP	001400006	Issued	001400006-0001

KR	30-2013-0035353	Issued	30-0736589
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L. The '057 Patent

74. The '057 Patent, entitled “Head Lamp for Automobiles,” issued to HMC on September 15, 2015, from U.S. Design Patent Application No. 29/463,590, filed January 9, 2014. The '057 Patent lists Sung-Ho Park and Seung-Tack Hong as inventors. A certified copy of the '057 Patent is attached to the Complaint as Exhibit 1.12.

75. The '057 Patent remains in full force and effect and expires on September 15, 2029. HMC is the owner of all right, title, and interest in and to the '057 Patent. A certified copy of the relevant assignment for the '057 Patent is attached to the Complaint as Exhibit 2.12.

76. Together with this Complaint, a certified copy of the prosecution history of the '057 Patent is attached as Appendix L, with a copy of the references cited in the prosecution history attached as Appendix L.1.

77. The '057 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '057 Patent. The '057 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

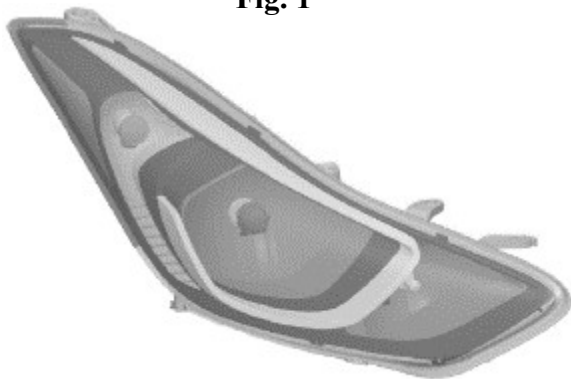
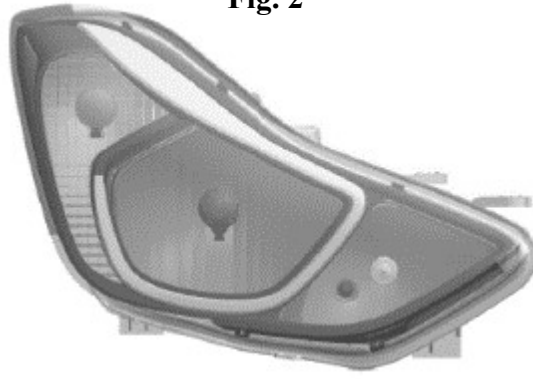


Fig. 2



PUBLIC VERSION

78. A list of foreign counterpart patents and/or applications to the '057 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '057 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201330635150.6	Issued	ZL201330635150.6
EP	001399992	Issued	001399992-0001
KR	30-2013-0035352	Issued	30-0736588

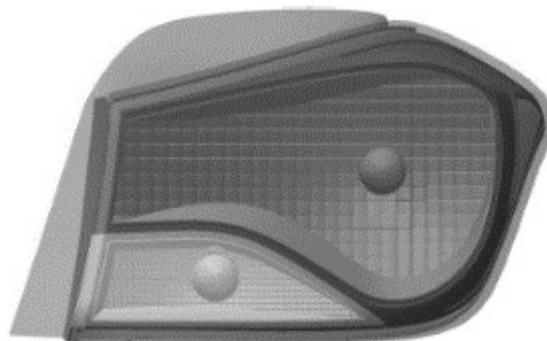
M. The '574 Patent

79. The '574 Patent, entitled "Rear Combination Lamp for Automobiles," issued to HMC on September 22, 2015, from U.S. Design Patent Application No. 29/463,588, filed January 9, 2014. The '574 Patent lists Sung-Ho Park and Seung-Tack Hong as inventors. A certified copy of the '574 Patent is attached to the Complaint as Exhibit 1.13.

80. The '574 Patent remains in full force and effect and expires on September 22, 2029. HMC is the owner of all right, title, and interest in and to the '574 Patent. A certified copy of the relevant assignment for the '574 Patent is attached to the Complaint as Exhibit 2.13.

81. Together with this Complaint, a certified copy of the prosecution history of the '574 Patent is attached as Appendix M, with a copy of the references cited in the prosecution history attached as Appendix M.1.

82. The '574 Patent is directed to specific ornamental design features for a rear combination lamp for automobiles, as shown and described in the '574 Patent. The '574 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1**Fig. 2**

83. A list of foreign counterpart patents and/or applications to the '574 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '574 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201330634939.X	Issued	ZL201330634939.X
EP	001399851	Issued	001399851-0001
KR	30-2013-0035356	Issued	30-0739264

N. The '980 Patent

84. The '980 Patent, entitled "Head Lamp for Automobiles," issued to HMC on October 13, 2015, from U.S. Design Patent Application No. 29/474,239, filed July 18, 2014. The '980 Patent lists Dong-jin Park and Dai-Sung Kim as inventors. A certified copy of the '980 Patent is attached to the Complaint as Exhibit 1.14.

85. The '980 Patent remains in full force and effect and expires on October 13, 2029. HMC is the owner of all right, title, and interest in and to the '980 Patent. A certified copy of the relevant assignment for the '980 Patent is attached to the Complaint as Exhibit 2.14.

PUBLIC VERSION

86. Together with this Complaint, a certified copy of the prosecution history of the '980 Patent is attached as Appendix N, with a copy of the references cited in the prosecution history attached as Appendix N.1.

87. The '980 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '980 Patent. The '980 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:



88. A list of foreign counterpart patents and/or applications to the '980 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '980 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201430094038.0	Issued	ZL201430094038.0
KR	30-2014-0007773	Issued	30-0756341-0001

O. The '864 Patent

89. The '864 Patent, entitled "Rear Combination Lamp for Automobiles," issued to HMC on June 21, 2016, from U.S. Design Patent Application No. 29/530,919, filed June 22,

PUBLIC VERSION

2015. The '864 Patent lists Joon-Bo Shim, Jae-Hyun Lee, Dai-Sung Kim, Sung-Uk Choi and Ki-Euk Kim as inventors. A certified copy of the '864 Patent is attached to the Complaint as Exhibit 1.15.

90. The '864 Patent remains in full force and effect and expires on June 21, 2031. HMC is the owner of all right, title, and interest in and to the '864 Patent. A certified copy of the relevant assignment for the '864 Patent is attached to the Complaint as Exhibit 2.15.

91. Together with this Complaint, a certified copy of the prosecution history of the '864 Patent is attached as Appendix O, with a copy of the references cited in the prosecution history attached as Appendix O.1.

92. The '864 Patent is directed to specific ornamental design features for a rear combination lamp for automobiles, as shown and described in the '864 Patent. The '864 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 5, reproduced below, are exemplary:

Fig. 1

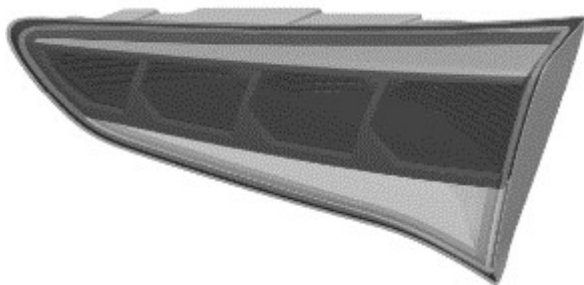


Fig. 5



93. A list of foreign counterpart patents and/or applications to the '864 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there

PUBLIC VERSION

are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '864 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201530067857.0	Issued	ZL201530067857.0
EP		Issued	DM/087310
KR	30-2015-0005087	Issued	30-0812456

P. The '865 Patent

94. The '865 Patent, entitled “Head Lamp for Automobiles,” issued to HMC on June 21, 2016, from U.S. Design Patent Application No. 29/530,922, filed June 22, 2015. The '865 Patent lists Joon-Bo Shim, Jae-Hyun Lee, Dai-Sung Kim, Sung-Uk Choi and Ki-Euk Kim as inventors. A certified copy of the '865 Patent is attached to the Complaint as Exhibit 1.16.

95. The '865 Patent remains in full force and effect and expires on June 21, 2031. HMC is the owner of all right, title, and interest in and to the '865 Patent. A certified copy of the relevant assignment for the '865 Patent is attached to the Complaint as Exhibit 2.16.

96. Together with this Complaint, a certified copy of the prosecution history of the '865 Patent is attached as Appendix P, with a copy of the references cited in the prosecution history attached as Appendix P.1.

97. The '865 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '865 Patent. The '865 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

PUBLIC VERSION

Fig. 1



Fig. 2



98. A list of foreign counterpart patents and/or applications to the '865 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '865 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201530067974.7	Issued	ZL201530067974.7
EP		Issued	DM/087282
KR	30-2015-0005089	Issued	30-0799219

Q. The '292 Patent

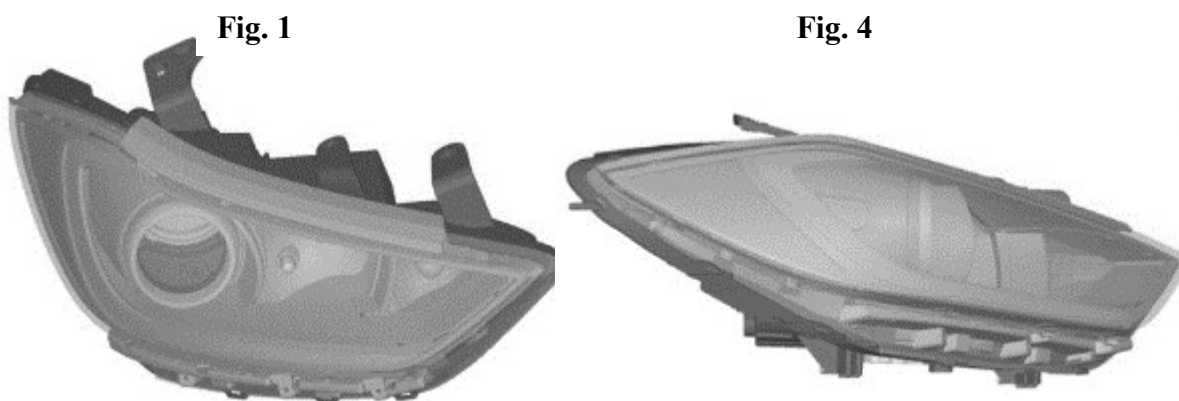
99. The '292 Patent, entitled "Head Lamp for Automobiles," issued to HMC on November 8, 2016, from U.S. Design Patent Application No. 29/543,913, filed October 29, 2015. The '292 Patent lists Ji-Won Ha and Bum-Young Song as inventors. A certified copy of the '292 Patent is attached to the Complaint as Exhibit 1.17.

100. The '292 Patent remains in full force and effect and expires on November 8, 2031. HMC is the owner of all right, title, and interest in and to the '292 Patent. A certified copy of the relevant assignment for the '292 Patent is attached to the Complaint as Exhibit 2.17.

101. Together with this Complaint, a certified copy of the prosecution history of the '292 Patent is attached as Appendix Q, with a copy of the references cited in the prosecution history attached as Appendix Q.1.

PUBLIC VERSION

102. The '292 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '292 Patent. The '292 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:



103. A list of foreign counterpart patents and/or applications to the '292 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '292 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201530386594.X	Issued	ZL201530386594.X
KR	30-2015-0038775	Issued	30-0833732

R. The '351 Patent

104. The '351 Patent, entitled "Rear Combination Lamp for Automobiles," issued to HMC on February 28, 2017, from U.S. Design Patent Application No. 29/543,932, filed October 29, 2015. The '351 Patent lists Ji-Won Ha and Bum-Young Song as inventors. A certified copy of the '351 Patent is attached to the Complaint as Exhibit 1.18.

PUBLIC VERSION

105. The '351 Patent remains in full force and effect and expires on February 28, 2032. HMC is the owner of all right, title, and interest in and to the '351 Patent. A certified copy of the relevant assignment for the '351 Patent is attached to the Complaint as Exhibit 2.18.

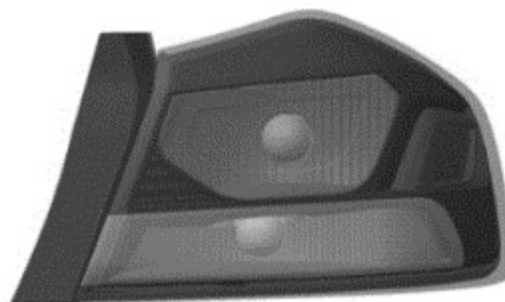
106. Together with this Complaint, a certified copy of the prosecution history of the '351 Patent is attached as Appendix R, with a copy of the references cited in the prosecution history attached as Appendix R.1.

107. The '351 Patent is directed to specific ornamental design features for a rear combination lamp for automobiles, as shown and described in the '351 Patent. The '351 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1



Fig. 2



108. A list of foreign counterpart patents and/or applications to the '351 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '351 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201530386546.0	Issued	ZL201530386546.0
KR	30-2015-0038773	Issued	30-0833730

S. The '163 Patent

109. The '163 Patent, entitled “Headlamp for Vehicles,” issued to HMC on May 15, 2018, from U.S. Design Patent Application No. 35/502,470, filed January 20, 2017. The '163 Patent lists Jiwon Ha, Chanhee Lee and Bumyoung Song as inventors. A certified copy of the '163 Patent is attached to the Complaint as Exhibit 1.19.

110. The '163 Patent remains in full force and effect and expires on May 15, 2033. HMC is the owner of all right, title, and interest in and to the '163 Patent. A certified copy of the relevant assignment for the '163 Patent is attached to the Complaint as Exhibit 2.19.

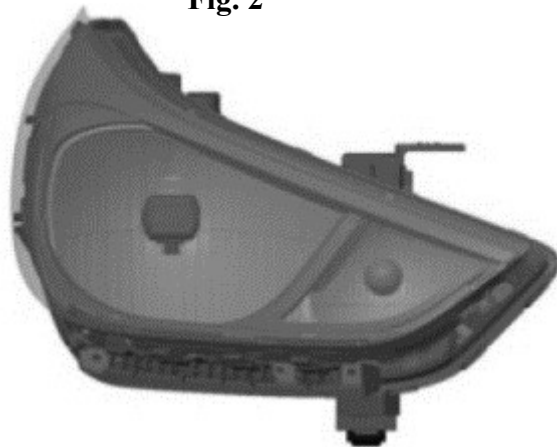
111. Together with this Complaint, a certified copy of the prosecution history of the '163 Patent is attached as Appendix S, with a copy of the references cited in the prosecution history attached as Appendix S.1.

112. The '163 Patent is directed to specific ornamental design features for a headlamp for vehicles, as shown and described in the '163 Patent. The '163 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1



Fig. 2



PUBLIC VERSION

113. A list of foreign counterpart patents and/or applications to the '163 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '163 Patent.

Country	Application No.	Status	Patent/Publication No.
IN	295689	Issued	295689

T. The '947 Patent

114. The '947 Patent, entitled "Headlight for Cars," issued to HMC on October 2, 2018, from U.S. Design Patent Application No. 35/503,208, filed April 25, 2017. The '947 Patent lists Woo-Joo Jung and Jun-ho Kim as inventors. A certified copy of the '947 Patent is attached to the Complaint as Exhibit 1.20.

115. The '947 Patent remains in full force and effect and expires on October 2, 2033. HMC is the owner of all right, title, and interest in and to the '947 Patent. A certified copy of the relevant assignment for the '947 Patent is attached to the Complaint as Exhibit 2.20.

116. Together with this Complaint, a certified copy of the prosecution history of the '947 Patent is attached as Appendix T, with a copy of the references cited in the prosecution history attached as Appendix T.1.

117. The '947 Patent is directed to specific ornamental design features for a headlight for cars, as shown and described in the '947 Patent. The '947 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

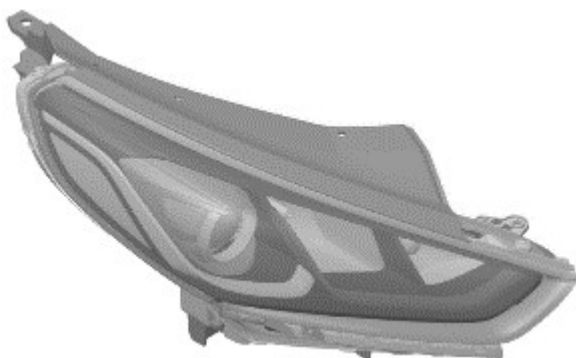
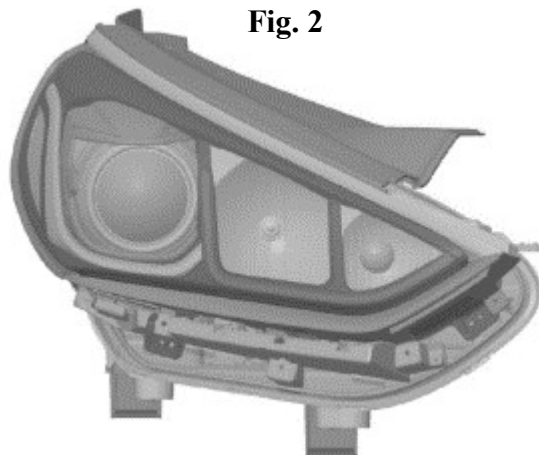


Fig. 2



118. A list of foreign counterpart patents and/or applications to the '947 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '947 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201730099339.6	Issued	ZL201730099339.6
KR	30-2017-0005175	Issued	30-0909823
WIPO	DM/096400	Expired	

U. The '225 Patent

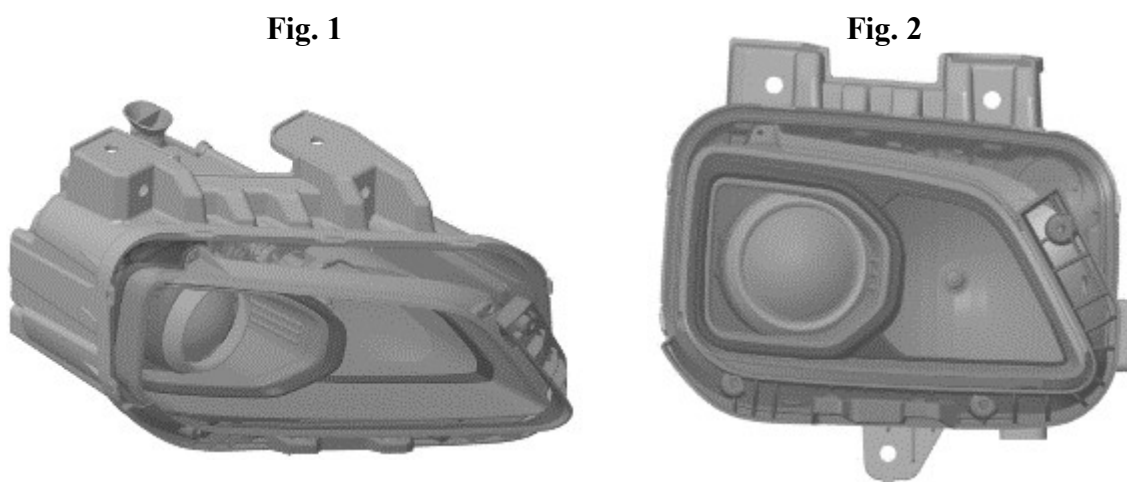
119. The '225 Patent, entitled "Headlight for Cars," issued to HMC on November 20, 2018, from U.S. Design Patent Application No. 35/503,746, filed August 10, 2017. The '225 Patent lists Oh-Young Kwon, Yu-Ra Cha, Jin-Sil Lee, Jin-Hyuk Bae, Dae-Keun Ryu and Sung-No Kim as inventors. A certified copy of the '225 Patent is attached to the Complaint as Exhibit 1.21.

120. The '225 Patent remains in full force and effect and expires on November 20, 2033. HMC is the owner of all right, title, and interest in and to the '225 Patent. A certified copy of the relevant assignment for the '225 Patent is attached to the Complaint as Exhibit 2.21.

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121. Together with this Complaint, a certified copy of the prosecution history of the '225 Patent is attached as Appendix U, with a copy of the references cited in the prosecution history attached as Appendix U.1.

122. The '225 Patent is directed to specific ornamental design features for a headlight for cars, as shown and described in the '225 Patent. The '225 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:



123. A list of foreign counterpart patents and/or applications to the '225 Patent is provided in a chart below. To the best of Hyundai's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '225 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201730275803.2	Issued	ZL201730275803.2
EP	WIPO65028	Issued	DM/097715
KR	30-2017-0007447	Issued	30-0914178
WIPO	DM/097759	Expired	

PUBLIC VERSION

VI. UNLAWFUL AND UNFAIR ACTS OF THE PROPOSED RESPONDENTS

124. Each of the Respondents, without license or authorization to do so, imports into the United States, sells for importation, and/or sells in the United States after importation certain replacement automotive lamps that infringe one or more of the Asserted Patents under 35 U.S.C. § 271. The Respondents' lamps infringe the Asserted Patents because in the eye of an ordinary observer, giving such attention as a purchaser usually gives, the designs of the Respondents' lamps are substantially the same as the designs embodied in the Asserted Patents, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing lamps.

125. Upon information and belief, the Respondents, without license or authorization to do so, also induce the infringement of the Asserted Patents by providing instruction or encouragement to other manufacturers, sellers, distributors, or others to infringe the Asserted Patents by manufacturing, selling, and/or distributing the Accused Products. Upon information and belief, the Respondents know and at all relevant times have known, or at the very least have been willfully blind, that Hyundai's Genuine Parts were protected by valid and enforceable U.S. patents. Upon information and belief, the Respondents know and at all relevant times have known of their infringement of the Asserted Patents or at the very least have been willfully blind to its infringement of the Asserted Patents because they copied the designs of Hyundai's Genuine Parts. Upon information and belief, the Respondents also know and at all relevant times have known, or at least have been willfully blind, that third-parties were infringing Hyundai's Asserted Patents. For example, upon information and belief, the Respondents provided infringing lamps to third parties and knew or encouraged third-parties to import those infringing lamps into the United States and/or sell those infringing lamps after importation in the United States.

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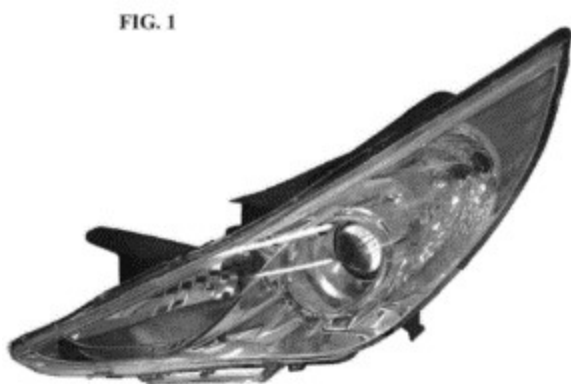
126. The counterfeit, infringing lamps identified in this section and throughout this Complaint are merely exemplary of the widespread violations of Section 337 by the Respondents for which investigation is sought. Upon information and belief, the Respondents sell multiple variations of knockoff lamps, one or more of which have been documented herein as an exemplary violation of Section 337 but in no way limit the Accused Products.

A. Respondents' Infringement of the '478 Patent

127. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '478 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

128. A claim chart that applies the '478 Patent to the Respondents' representative infringing product (TYC Part No. 20-9256-00-9; LKQ Part No. HY2502157C) is attached as Exhibit 4.01. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '478 Patent.

Fig. 1 of the '478 Patent



Infringing Product



PUBLIC VERSION

129. The claim chart illustrates that the Respondents' representative infringing product infringes the '478 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '478 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

B. Respondents' Infringement of the '8835 Patent

130. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement taillamps that infringe the '8835 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement taillamps manufactured or have made by the TYC Respondents.

131. A claim chart that applies the '8835 Patent to the Respondents' representative infringing product (TYC Part No. 11-6347-00-9; LKQ Part No. HY2805116C) is attached as Exhibit 4.02. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '8835 Patent.

Fig. 1 of the '8835 Patent



Infringing Product



132. The claim chart illustrates that the Respondents' representative infringing product infringes the '8835 Patent because the design of the Respondents' representative product is

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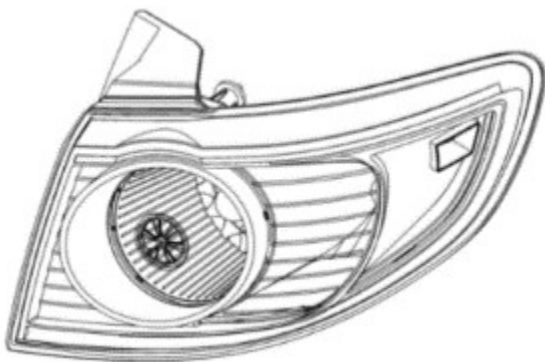
substantially identical to the design embodied in the '8835 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

C. Respondents' Infringement of the '836 Patent

133. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement taillamps that infringe the '836 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement taillamps manufactured by the TYC Respondents.

134. A claim chart that applies the '836 Patent to the Respondents' representative infringing product (TYC Part No. 11-6493-00-9; LKQ Part No. HY2805117C) is attached as Exhibit 4.03. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '836 Patent.

Fig. 1 of the '836 Patent



Infringing Product



135. The claim chart illustrates that the Respondents' representative infringing product infringes the '836 Patent because the design of the Respondents' representative product is

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substantially identical to the design embodied in the '836 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

D. Respondents' Infringement of the '583 Patent

136. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '583 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

137. A claim chart that applies the '583 Patent to the Respondents' representative infringing product (TYC Part No. 20-12361-00-9; LKQ Part No. HY2503158C) is attached as Exhibit 4.04. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '583 Patent.

Fig. 1 of the '583 Patent



Infringing Product



138. The claim chart illustrates that the Respondents' representative infringing product infringes the '583 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '583 Patent, and the resemblance is such as

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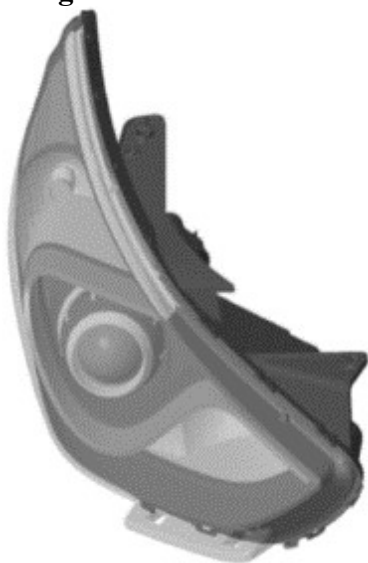
to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

E. Respondents' Infringement of the '319 Patent

139. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '319 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

140. A claim chart that applies the '319 Patent to the Respondents' representative infringing product (TYC Part No. 20-9690-00-9; LKQ Part No. HY2502177C) is attached as Exhibit 4.05. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '319 Patent.

Fig. 1 of the '319 Patent



Infringing Product



141. The claim chart illustrates that the Respondents' representative infringing product infringes the '319 Patent because the design of the Respondents' representative product is

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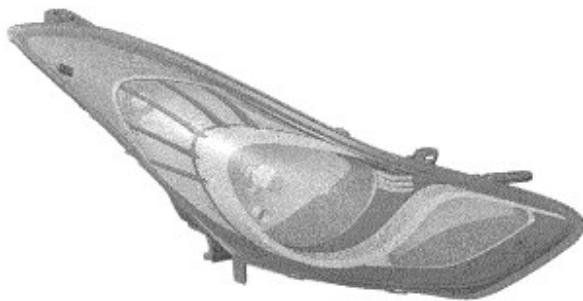
substantially identical to the design embodied in the '319 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

F. Respondents' Infringement of the '812 Patent

142. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '812 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

143. A claim chart that applies the '812 Patent to the Respondents' representative infringing product (TYC Part No. 20-12551-00-9; LKQ Part No. HY2503161C) is attached as Exhibit 4.06. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '812 Patent.

Fig. 1 of the '812 Patent



Infringing Product



144. The claim chart illustrates that the Respondents' representative infringing product infringes the '812 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '812 Patent, and the resemblance is such as

PUBLIC VERSION

to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

G. Respondents' Infringement of the '5835 Patent

145. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '5835 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

146. A claim chart that applies the '5835 Patent to the Respondents' representative infringing product (TYC Part No. 20-12693-00-9; LKQ Part No. HY2503163C) is attached as Exhibit 4.07. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '5835 Patent.

Fig. 1 of the '5835 Patent
FIG. 1



Infringing Product



147. The claim chart illustrates that the Respondents' representative infringing product infringes the '5835 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '5835 Patent, and the resemblance is such as

PUBLIC VERSION

to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

H. Respondents' Infringement of the '690 Patent

148. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '690 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

149. A claim chart that applies the '690 Patent to the Respondents' representative infringing product (TYC Part No. 20-9377-00-9; LKQ Part No. HY2503173C) is attached as Exhibit 4.08. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '690 Patent.

Fig. 1 of the '690 Patent



Infringing Product



150. The claim chart illustrates that the Respondents' representative infringing product infringes the '690 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '690 Patent, and the resemblance is such as

PUBLIC VERSION

to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

I. Respondents' Infringement of the '217 Patent

151. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '217 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

152. A claim chart that applies the '217 Patent to the Respondents' representative infringing product (TYC Part No. 20-9379-00-9; LKQ Part No. HY2503169C) is attached as Exhibit 4.09. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '217 Patent.

Fig. 1 of the '217 Patent



Infringing Product



153. The claim chart illustrates that the Respondents' representative infringing product infringes the '217 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '217 Patent, and the resemblance is such as

PUBLIC VERSION

to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

J. Respondents' Infringement of the '436 Patent

154. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement taillamps that infringe the '436 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement taillamps manufactured by the TYC Respondents.

155. A claim chart that applies the '436 Patent to the Respondents' representative infringing product (TYC Part No. 11-6721-00; LKQ Part No. HY2805129C) is attached as Exhibit 4.10. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '436 Patent.

Fig. 1 of the '436 Patent



Infringing Product



156. The claim chart illustrates that the Respondents' representative infringing product infringes the '436 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '436 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

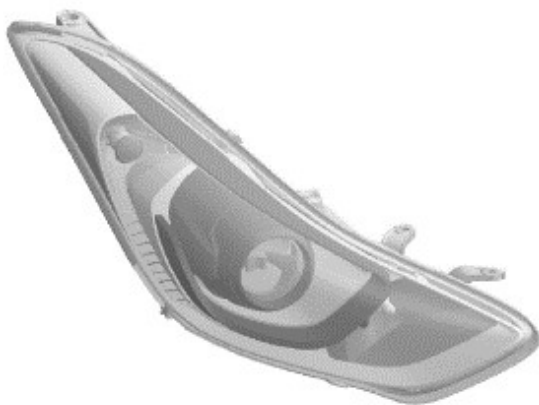
PUBLIC VERSION

K. Respondents' Infringement of the '003 Patent

157. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '003 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

158. A claim chart that applies the '003 Patent to the Respondents' representative infringing product (TYC Part No. 20-9642-00-9; LKQ Part No. HY2502186C) is attached as Exhibit 4.11. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '003 Patent.

Fig. 1 of the '003 Patent



Infringing Product



159. The claim chart illustrates that the Respondents' representative infringing product infringes the '003 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '003 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

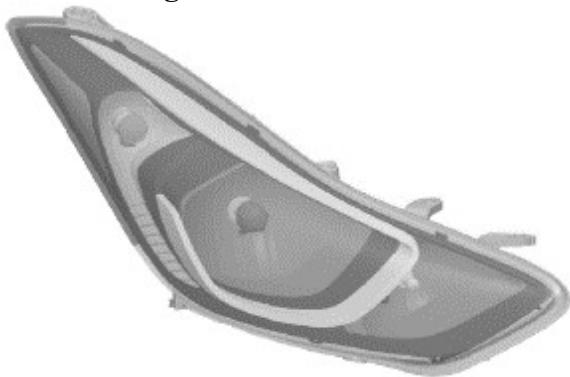
PUBLIC VERSION

L. Respondents' Infringement of the '057 Patent

160. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '057 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

161. A claim chart that applies the '057 Patent to the Respondents' representative infringing product (TYC Part No. 20-9640-00-9; LKQ Part No. HY2502187C) is attached as Exhibit 4.12. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '057 Patent.

Fig. 1 of the '057 Patent



Infringing Product



162. The claim chart illustrates that the Respondents' representative infringing product infringes the '057 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '057 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

PUBLIC VERSION

M. Respondents' Infringement of the '574 Patent

163. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement taillamps that infringe the '574 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement taillamps manufactured by the TYC Respondents.

164. A claim chart that applies the '574 Patent to the Respondents' representative infringing product (TYC Part No. 11-6757-00-9; LKQ Part No. HY2805131C) is attached as Exhibit 4.13. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '574 Patent.

Fig. 1 of the '574 Patent



Infringing Product



165. The claim chart illustrates that the Respondents' representative infringing product infringes the '574 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '574 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

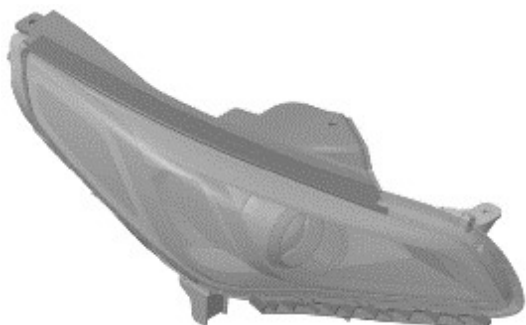
PUBLIC VERSION

N. Respondents' Infringement of the '980 Patent

166. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '980 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

167. A claim chart that applies the '980 Patent to the Respondents' representative infringing product (TYC Part No. 20-9595-00-9; LKQ Part No. HY2503183C) is attached as Exhibit 4.14. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '980 Patent.

Fig. 1 of the '980 Patent



Infringing Product



168. The claim chart illustrates that the Respondents' representative infringing product infringes the '980 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '980 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

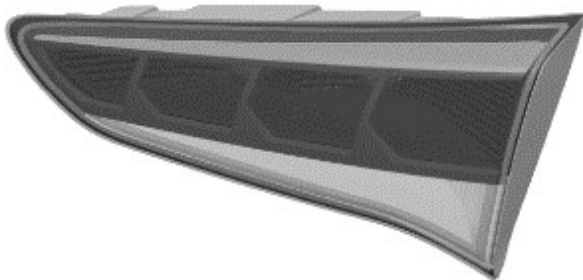
PUBLIC VERSION

O. Respondents' Infringement of the '864 Patent

169. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement taillamps that infringe the '864 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement taillamps manufactured by the TYC Respondents.

170. A claim chart that applies the '864 Patent to the Respondents' representative infringing product (TYC Part No. 17-5614-00-9; LKQ Part No. HY2802135C) is attached as Exhibit 4.15. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '864 Patent.

Fig. 1 of the '864 Patent



Infringing Product



171. The claim chart illustrates that the Respondents' representative infringing product infringes the '864 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '864 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

PUBLIC VERSION

P. Respondents' Infringement of the '865 Patent

172. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '865 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

173. A claim chart that applies the '865 Patent to the Respondents' representative infringing product (TYC Part No. 20-9746-90-9; LKQ Part No. HY2502199C) is attached as Exhibit 4.16. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '865 Patent.

Fig. 1 of the '865 Patent



Infringing Product



174. The claim chart illustrates that the Respondents' representative infringing product infringes the '865 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '865 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

PUBLIC VERSION

Q. Respondents' Infringement of the '292 Patent

175. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '292 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

176. A claim chart that applies the '292 Patent to the Respondents' representative infringing product (TYC Part No. 20-9807-00-9; LKQ Part No. HY2503206C) is attached as Exhibit 4.17. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '292 Patent.

Fig. 1 of the '292 Patent



Infringing Product



177. The claim chart illustrates that the Respondents' representative infringing product infringes the '292 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '292 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

PUBLIC VERSION

R. Respondents' Infringement of the '351 Patent

178. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement taillamps that infringe the '351 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement taillamps manufactured by the TYC Respondents.

179. A claim chart that applies the '351 Patent to the Respondents' representative infringing product (TYC Part No. 11-6903-00-9; LKQ Part No. HY2805142C) is attached as Exhibit 4.18. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '351 Patent.

Fig. 1 of the '351 Patent



Infringing Product



180. The claim chart illustrates that the Respondents' representative infringing product infringes the '351 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '351 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

PUBLIC VERSION

S. Respondents' Infringement of the '163 Patent

181. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '163 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

182. A claim chart that applies the '163 Patent to the Respondents' representative infringing product (TYC Part No. 20-16343-00; LKQ Part No. HY2503218) is attached as Exhibit 4.19. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '163 Patent.

Fig. 1 of the '163 Patent



Infringing Product



183. The claim chart illustrates that the Respondents' representative infringing product infringes the '163 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '163 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

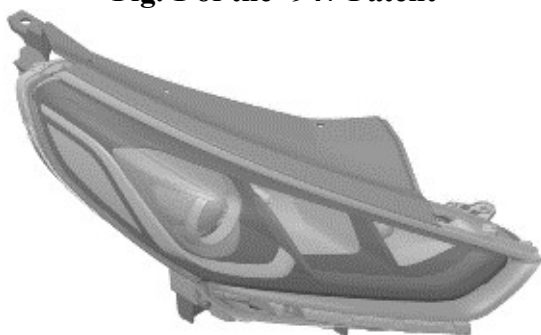
PUBLIC VERSION

T. Respondents' Infringement of the '947 Patent

184. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '947 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

185. A claim chart that applies the '947 Patent to the Respondents' representative infringing product (TYC Part No. 20-16159-00-9; LKQ Part No. HY2503217C) is attached as Exhibit 4.20. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '947 Patent.

Fig. 1 of the '947 Patent



Infringing Product



186. The claim chart illustrates that the Respondents' representative infringing product infringes the '947 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '947 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

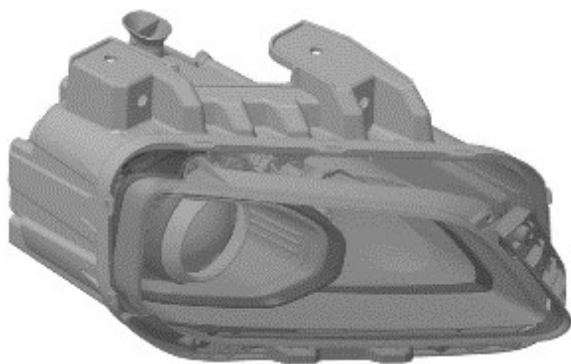
PUBLIC VERSION

U. Respondents' Infringement of the '225 Patent

187. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '225 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

188. A claim chart that applies the '225 Patent to the Respondents' representative infringing product (TYC Part No. 20-16569-00; LKQ Part No. HY2503223) is attached as Exhibit 4.21. As an example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '225 Patent.

Fig. 1 of the '225 Patent



Infringing Product



189. The claim chart illustrates that the Respondents' representative infringing product infringes the '225 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '225 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

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VII. SPECIFIC ACTS OF UNFAIR IMPORTATION AND SALE

190. On information and belief, the Respondents' Accused Products are imported into the United States, sold for importation into the United States, and/or sold after they are imported into the United States. On information and belief, the Respondents will continue importing, selling for importation, and/or selling within the United States after importation the Accused Products, in violation of Section 337.

191. On information and belief, the Respondents' Accused Products are manufactured, assembled, and/or packaged in Taiwan. *See Exhibits 5.06-5.26.* The Respondents' Accused Products are then imported into the United States, sold for importation into the United States, and/or sold after importation into the United States by the Respondents and others. *See Exhibits 5.26-5.54.*

192. As detailed below, the Complainants have obtained, in the United States, representative samples of at least one infringing automotive lamp that infringes each corresponding one of the Asserted Patents. Specific instances of importation, sale for importation, and/or sale within the United States after importation of infringing automotive lamps by the Respondents are summarized below.

Asserted Patent	Representative Accused Product	Manufacturer	Country of Origin	Purchase Date	Purchase Store
The '478 Patent	LKQ: HY2502157C; TYC: 20-9256-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online ²
The '8835 Patent	LKQ: HY2805116C; TYC: 11-6347-00-9	TYC Brothers (for Keystone)	Taiwan	12-Aug-2021	LKQ Online
The '836 Patent	LKQ: HY2805117C; TYC: 11-6493-00-9	TYC Brothers	Taiwan	16-Sep-2021	LKQ Online
The '583 Patent	LKQ: HY2503158C; TYC: 20-12361-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '319 Patent	LKQ: HY2502177C; TYC: 20-9690-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online

² <https://www.lkqonline.com>

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Asserted Patent	Representative Accused Product	Manufacturer	Country of Origin	Purchase Date	Purchase Store
The '812 Patent	LKQ: HY2503161C; TYC: 20-12551-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '5835 Patent	LKQ: HY2503163C; TYC: 20-12693-00-9	TYC Brothers	Taiwan	18-Jun-2021	LKQ Online
The '690 Patent	LKQ: HY2503173C; TYC: 20-9377-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '217 Patent	LKQ: HY2503169C; TYC: 20-9379-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '436 Patent	LKQ: HY2805129C; TYC: 11-6721-00	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '003 Patent	LKQ: HY2502186C; TYC: 20-9642-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '057 Patent	LKQ: HY2502187C; TYC: 20-9640-00-9	TYC Brothers	Taiwan	15-Sep-2021	LKQ Online
The '574 Patent	LKQ: HY2805131C; TYC: 11-6757-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '980 Patent	LKQ: HY2503183C; TYC: 20-9595-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '864 Patent	LKQ: HY2802135C; TYC: 17-5614-009	TYC Brothers	Taiwan	27-Aug-2021	LKQ Online
The '865 Patent	LKQ: HY2502199C; TYC: 20-9746-90-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '292 Patent	LKQ: HY2503206C; TYC: 20-9807-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
The '351 Patent	LKQ: HY2805142C; TYC: 11-6903-00-9	TYC Brothers	Taiwan	27-Aug-2021	LKQ Online
The '163 Patent	LKQ: HY2503218; TYC: 20-16343-00	TYC Brothers	Taiwan	9-Sep-2021	LKQ Online
The '947 Patent	LKQ: HY2503217C; TYC: 20-16159-00-9	TYC Brothers	Taiwan	27-Aug-2021	LKQ Online
The '225 Patent	LKQ: HY2503223; TYC: 20-16569-00	TYC Brothers	Taiwan	21-Sep-2021	LKQ Online

A. The TYC Respondents

193. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation the Accused Products in violation of, *inter alia*, Section 337(a)(1)(B)(i). On information and belief, the TYC Respondents have sold or offered for sale and/or continues to sell or offer for sale the Accused Products via various sales and distribution channels. For example, the TYC Respondents' Accused Products have been sold and/or offered

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for sale and/or are being sold or offered for sale in various popular online marketplaces, such as Amazon³, eBay⁴, Walmart⁵, Rockauto⁶, and LKQ Online. Exhibits 5.01-5.05 are printouts of the website pages evidencing that an exemplary Accused Product (*i.e.*, TYC Part No. 20-9256-00-9) that infringes the '478 Patent is being sold or offered for sale in the United States in the above-mentioned marketplaces. The specific instances of importation and sale of the representative Accused Products are detailed below.⁷

i. Importation and Sale of Products Infringing the '478 Patent

194. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2014 Hyundai Sonata headlamps that infringe the '478 Patent. On information and belief, the Accused Products that infringe the '478 Patent include, but are not limited to, TYC Part Nos. 20-9150-00, 20-9150-00-9, 20-9150-00-1, 20-9149-00, 20-9149-00-9, 20-9149-00-1, 20-9256-00, 20-9256-00-9, 20-9256-00-1, 20-9255-00, 20-9255-00-9, and 20-9255-00-1. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.06 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9256-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

³ <https://www.amazon.com>

⁴ <https://www.ebay.com>

⁵ <https://www.walmart.com>

⁶ <https://www.rockauto.com>

⁷ Hyundai seeks relief on the TYC Respondents' any other products that may be discovered during this investigation that infringe the Asserted Patents, regardless of whether those products were identified herein.

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195. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices, reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.27 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled “MADE IN TAIWAN.”



ii. Importation and Sale of Products Infringing the '8835 Patent

196. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2014 Hyundai Sonata taillamps that infringe the '8835 Patent. On information and belief, the Accused Products that infringe the '8835 Patent include, but are not limited to, TYC Part Nos. 11-6347-00-9, 11-6347-00, 11-6347-00-1, 11-6348-00-9, 11-6348-00, and 11-6348-00-1. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.07 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6347-00-9) from the Respondent

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Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

197. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of a representative Accused Product (Keystone Part No. HY2805116C) that was purchased from LKQ Online in the United States and delivered to an address in the United States. On information and belief, this product was manufactured by the TYC Respondents (*See* the product label below indicating "TYC INTERNAL 11-6347-00-CR"). Exhibit 5.28 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



iii. Importation and Sale of Products Infringing the '836 Patent

198. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2010-2012 Hyundai Santa Fe taillamps that infringe the '836 Patent. On information and belief, the Accused Products that infringe the '836 Patent include, but are not limited to, TYC Part Nos. 11-6493-00, 11-6493-00-9, 11-6493-00-1, 11-6494-00, 11-

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6494-00-9, and 11-6494-00-1. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.08 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6493-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

199. Exhibit 5.53 is an order receipt dated September 16, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.29 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



iv. Importation and Sale of Products Infringing the '583 Patent

200. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2010-2013 Hyundai Tucson headlamps that infringe the '583

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Patent. On information and belief, the Accused Products that infringe the '583 Patent include, but are not limited to, TYC Part Nos. 20-12361-00-1, 20-12361-00-9, 20-12361-00, 20-12362-00-1, 20-12362-00-9, and 20-12362-00. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.09 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-12361-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

201. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.30 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



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v. Importation and Sale of Products Infringing the '319 Patent

202. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2015 Hyundai Sonata headlamps that infringe the '319 Patent. On information and belief, the Accused Products that infringe the '319 Patent include, but are not limited to, TYC Part Nos. 20-9689-00, 20-9689-00-9, 20-9689-00-1, 20-9690-00, 20-9690-00-9, and 20-9690-00-1. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.10 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9690-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

203. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.31 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."

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vi. Importation and Sale of Products Infringing the '812 Patent

204. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2013 Hyundai Elantra headlamps that infringe the '812 Patent. On information and belief, the Accused Products that infringe the '812 Patent include, but are not limited to, TYC Part Nos. 20-12551-00, 20-12551-00-1, 20-12551-00-9, 20-12552-00, 20-12552-00-1, and 20-12552-00-9. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.11 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-12551-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

205. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.32 shows the

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pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled “MADE IN TAIWAN.”



vii. Importation and Sale of Products Infringing the '5835 Patent

206. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2012-2014 Hyundai Accent headlamps that infringe the '5835 Patent. On information and belief, the Accused Products that infringe the '5835 Patent include, but are not limited to, TYC Part Nos. 20-12693-00, 20-12693-00-9, 20-12693-00-1, 20-12694-00, 20-12694-00-9, and 20-12694-00-1. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.12 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-12693-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

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207. Exhibit 5.48 is an order receipt dated June 18, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.33 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled “MADE IN TAIWAN.”



viii. Importation and Sale of Products Infringing the '690 Patent

208. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2012-2016 Hyundai Elantra headlamps that infringe the '690 Patent. On information and belief, the Accused Products that infringe the '690 Patent include, but are not limited to, TYC Part Nos. 20-9378-00-1, 20-9378-00, 20-9378-00-9, 20-9377-00-1, 20-9377-00, and 20-9377-00-9. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.13 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9377-00-9) from the Respondent

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Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

209. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.34 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



ix. Importation and Sale of Products Infringing the '217 Patent

210. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2013-2017 Hyundai Santa Fe headlamps that infringe the '217 Patent. On information and belief, the Accused Products that infringe the '217 Patent include, but are not limited to, TYC Part Nos. 20-9380-00-9, 20-9380-00-1, 20-9380-00, 20-9438-00-1, 20-9438-00, 20-9438-00-9, 20-9379-00-9, 20-9379-00-1, 20-9379-00, 20-9437-00-1, 20-9437-00, and 20-9437-00-9. These Accused Products are listed in the Respondent Genera's part-

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search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.14 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9379-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

211. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.35 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



x. Importation and Sale of Products Infringing the '436 Patent

212. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2015-2017 Hyundai Sonata taillamps that infringe the '436 Patent. On information and belief, the Accused Products that infringe the '436 Patent include,

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but are not limited to, TYC Part Nos. 11-6721-00-1, 11-6721-00, 11-6721-00-9, 11-6722-00-1, 11-6722-00, and 11-6722-00-9. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.15 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6721-00) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

213. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.36 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



xi. Importation and Sale of Products Infringing the '003 Patent

214. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Hyundai Elantra headlamps that infringe the '003 Patent. On information and belief, the Accused Products that infringe the '003 Patent include, but are not limited to, TYC Part Nos. 20-9642-00, 20-9642-00-9, 20-9642-00-1, 20-9641-00, 20-9641-00-9, and 20-9641-00-1. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United

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States. Exhibit 5.16 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9642-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

215. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.37 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



xii. Importation and Sale of Products Infringing the '057 Patent

216. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Hyundai Elantra headlamps that infringe the '057 Patent. On information and belief, the Accused Products that infringe the '057 Patent include, but are not limited to, TYC Part Nos. 20-9616-00, 20-9616-00-9, 20-9615-00, 20-9615-00-9, 20-

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9640-00, 20-9640-00-9, 20-9640-00-1, 20-9639-00, 20-9639-00-9, and 20-9639-00-1. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.17 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9640-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

217. Exhibit 5.52 is an order receipt dated September 15, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.38 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



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xiii. Importation and Sale of Products Infringing the '574 Patent

218. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Hyundai Elantra taillamps that infringe the '574 Patent. On information and belief, the Accused Products that infringe the '574 Patent include, but are not limited to, TYC Part Nos. 11-6757-90, 11-6757-90-9, 11-6758-90, 11-6758-90-9, 11-6757-00-9, 11-6757-00-1, 11-6757-00, 11-6758-00-9, 11-6758-00-1, and 11-6758-00. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.18 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6757-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

219. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.39 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."

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xiv. Importation and Sale of Products Infringing the '980 Patent

220. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2015-2017 Hyundai Sonata headlamps that infringe the '980 Patent. On information and belief, the Accused Products that infringe the '980 Patent include, but are not limited to, TYC Part Nos. 20-9596-00-1, 20-9596-00, 20-9596-00-9, 20-9595-00-1, 20-9595-00, 20-9595-00-9, 20-9596-90, 20-9596-90-9, 20-9596-90-1, 20-9595-90, 20-9595-90-9, and 20-9595-90-1. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.19 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9595-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

221. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in

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the United States and delivered to an address in the United States. Exhibit 5.40 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled “MADE IN TAIWAN.”



xv. Importation and Sale of Products Infringing the '864 Patent

222. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Hyundai Tucson taillamps that infringe the '864 Patent. On information and belief, the Accused Products that infringe the '864 Patent include, but are not limited to, TYC Part Nos. 17-5613-00, 17-5613-00-1, 17-5613-00-9, 17-5614-00, 17-5614-00-1, and 17-5614-00-9. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.20 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 17-5614-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

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223. Exhibit 5.52 is an order receipt dated September 15, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.41 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled “MADE IN TAIWAN.”



xvi. Importation and Sale of Products Infringing the '865 Patent

224. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Hyundai Tucson headlamps that infringe the '865 Patent. On information and belief, the Accused Products that infringe the '865 Patent include, but are not limited to, TYC Part Nos. 20-9745-90, 20-9745-90-9, 20-9746-90, and 20-9746-90-9. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.21 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9746-90-9) from the Respondent Genera's part-search website. The

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product description reflects that Taiwan is the country of origin for the representative Accused Product.

225. Exhibit 5.50 is an order receipt dated August 27, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.42 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled “MADE IN TAIWAN.”



xvii. Importation and Sale of Products Infringing the '292 Patent

226. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2018 Hyundai Elantra headlamps that infringe the '292 Patent. On information and belief, the Accused Products that infringe the '292 Patent include, but are not limited to, TYC Part Nos. 20-9807-00, 20-9807-00-9, 20-9807-00-1, 20-9808-00, 20-9808-00-9, 20-9808-00-1, 20-9807-90, 20-9807-90-9, 20-9807-90-1, 20-9808-90, 20-9808-90-9, and 20-9808-90-1. These Accused Products are listed in the Respondent Genera's part-

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search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.22 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9807-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

227. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.43 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



xviii. Importation and Sale of Products Infringing the '351 Patent

228. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2018 Hyundai Elantra taillamps that infringe the '351 Patent. On information and belief, the Accused Products that infringe the '351 Patent include,

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but are not limited to, TYC Part Nos. 11-6904-00, 11-6904-00-1, 11-6904-00-9, 11-6903-00, 11-6903-00-1, and 11-6903-00-9. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.23 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6903-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

229. Exhibit 5.50 is an order receipt dated August 27, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.44 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."



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xix. Importation and Sale of Products Infringing the '163 Patent

230. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2018-21 Hyundai Accent headlamps that infringe the '163 Patent. On information and belief, the Accused Products that infringe the '163 Patent include, but are not limited to, TYC Part Nos. 20-16343-00, 20-16343-00-9, 20-16344-00, and 20-16344-00-9. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.24 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-16343-00) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

231. Exhibit 5.51 is an order receipt dated September 9, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.45 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled "MADE IN TAIWAN."

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xx. Importation and Sale of Products Infringing the '947 Patent

232. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2019 Hyundai Sonata headlamps that infringe the '947 Patent. On information and belief, the Accused Products that infringe the '947 Patent include, but are not limited to, TYC Part Nos. 20-16159-00-9, 20-16159-00, 20-16159-00-1, 20-16160-00-9, 20-16160-00, and 20-16160-00-1. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.25 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-16159-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

233. Exhibit 5.50 is an order receipt dated August 27, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.46 shows the

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pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled “MADE IN TAIWAN.”



xxi. Importation and Sale of Products Infringing the '225 Patent

234. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2018-2020 Hyundai Kona headlamps that infringe the '225 Patent. On information and belief, the Accused Products that infringe the '225 Patent include, but are not limited to, TYC Part Nos. 20-16569-00, 20-16569-00-1, 20-16569-00-9, 20-16570-00, 20-16570-00-1, and 20-16570-00-9. These Accused Products are listed in the Respondent Genera's part-search website (<https://tyc.autocaredata.com>) as being available for purchase in the United States. Exhibit 5.26 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-16569-00) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

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235. Exhibit 5.54 is an order receipt dated September 21, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States. Exhibit 5.47 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced below, the representative Accused Product is labeled “MADE IN TAIWAN.”



B. The LKQ Respondents

236. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation the Accused Products in violation of, *inter alia*, Section 337(a)(1)(B)(i). On information and belief, the LKQ Respondents have sold or offered for sale and/or continues to sell or offer for sale the Accused Products via at least its LKQ Online store

(<https://www.lkqonline.com>). The specific instances of importation and sale of the representative Accused Products are detailed below.⁸

i. Importation and Sale of Products Infringing the '478 Patent

237. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2014 Hyundai Sonata headlamps that infringe the '478 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.i. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2502157C; TYC Part No. 20-9256-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices, reflecting the sale of the representative Accused Product that was purchased from LKQ Online in the United States and delivered to an address in the United States.

238. Exhibit 5.55 is printouts of the product descriptions of the representative Accused Product from the LKQ Online store. Exhibit 5.27 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.i, the representative Accused Product is labeled "MADE IN TAIWAN."

ii. Importation and Sale of Products Infringing the '8835 Patent

239. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2014 Hyundai Sonata taillamps that infringe the '8835 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.ii. The

⁸ Hyundai seeks relief on the LKQ Respondents' any other products that may be discovered during this investigation that infringe the Asserted Patents, regardless of whether those products were identified herein.

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Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2805116C; TYC Part No. 11-6347-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

240. Exhibit 5.56 is printouts of the product descriptions of the representative Accused Product from the LKQ Online store. Exhibit 5.28 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.ii, the representative Accused Product is labeled “MADE IN TAIWAN.”

iii. Importation and Sale of Products Infringing the ’836 Patent

241. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2010-2012 Hyundai Santa Fe taillamps that infringe the ’836 Patent. The LKQ Respondents’ Accused Products include, but are not limited to, at least one of the TYC Respondents’ Accused Products identified above in Section VII.A.iii. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2805117C; TYC Part No. 11-6493-00-9) from the LKQ Online store. Exhibit 5.53 is an order receipt dated September 16, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

242. Exhibit 5.57 is printouts of the product descriptions of the representative Accused Product from the LKQ Online store. Exhibit 5.29 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.iii, the representative Accused Product is labeled “MADE IN TAIWAN.”

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iv. Importation and Sale of Products Infringing the '583 Patent

243. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2010-2013 Hyundai Tucson headlamps that infringe the '583 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.iv. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503158C; TYC Part No. 20-12361-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

244. Exhibit 5.58 is printouts of the product descriptions of the representative Accused Product from the LKQ Online store. Exhibit 5.30 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.iv, the representative Accused Product is labeled "MADE IN TAIWAN."

v. Importation and Sale of Products Infringing the '319 Patent

245. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2015 Hyundai Sonata headlamps that infringe the '319 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.v. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2502177C; TYC Part No. 20-9690-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

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246. Exhibit 5.59 is printouts of the product descriptions of the representative Accused Product from the LKQ Online store. Exhibit 5.31 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.v, the representative Accused Product is labeled “MADE IN TAIWAN.”

vi. Importation and Sale of Products Infringing the ’812 Patent

247. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2013 Hyundai Elantra headlamps that infringe the ’812 Patent. The LKQ Respondents’ Accused Products include, but are not limited to, at least one of the TYC Respondents’ Accused Products identified above in Section VII.A.vi. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503161C; TYC Part No. 20-12551-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

248. Exhibit 5.30 is printouts of the product descriptions of the representative Accused Product from the LKQ Online store. Exhibit 5.32 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.vi, the representative Accused Product is labeled “MADE IN TAIWAN.”

vii. Importation and Sale of Products Infringing the ’5835 Patent

249. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2012-2014 Hyundai Accent headlamps that infringe the ’5835 Patent. The LKQ Respondents’ Accused Products include, but are not limited to, at least one of the TYC Respondents’ Accused Products identified above in Section VII.A.vii. The

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Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503163C; TYC Part No. 20-12693-00-9) from the LKQ Online store. Exhibit 5.48 is an order receipt dated June 18, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

250. Exhibit 5.61 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.33 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.vii, the representative Accused Product is labeled “MADE IN TAIWAN.”

viii. Importation and Sale of Products Infringing the '690 Patent

251. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2012-2016 Hyundai Elantra headlamps that infringe the '690 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.viii. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503173C; TYC Part No. 20-9377-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

252. Exhibit 5.62 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.34 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.viii, the representative Accused Product is labeled “MADE IN TAIWAN.”

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ix. Importation and Sale of Products Infringing the '217 Patent

253. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2013-2017 Hyundai Santa Fe headlamps that infringe the '217 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.ix. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503169C; TYC Part No. 20-9379-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

254. Exhibit 5.63 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.35 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.ix, the representative Accused Product is labeled "MADE IN TAIWAN."

x. Importation and Sale of Products Infringing the '436 Patent

255. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2015-2017 Hyundai Sonata taillamps that infringe the '436 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.x. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2805129C; TYC Part No. 11-6721-00) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

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256. Exhibit 5.64 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.36 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.x, the representative Accused Product is labeled “MADE IN TAIWAN.”

xi. Importation and Sale of Products Infringing the '003 Patent

257. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Hyundai Elantra headlamps that infringe the '003 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.xi. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2502186C; TYC Part No. 20-9642-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

258. Exhibit 5.65 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.37 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xi, the representative Accused Product is labeled “MADE IN TAIWAN.”

xii. Importation and Sale of Products Infringing the '057 Patent

259. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Hyundai Elantra headlamps that infringe the '057 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.xii. The

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Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2502187C; TYC Part No. 20-9640-00-9) from the LKQ Online store. Exhibit 5.52 is an order receipt dated September 15, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

260. Exhibit 5.66 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.38 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xii, the representative Accused Product is labeled “MADE IN TAIWAN.”

xiii. Importation and Sale of Products Infringing the ’574 Patent

261. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Hyundai Elantra taillamps that infringe the ’574 Patent. The LKQ Respondents’ Accused Products include, but are not limited to, at least one of the TYC Respondents’ Accused Products identified above in Section VII.A.xiii. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2805131C; TYC Part No. 11-6757-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

262. Exhibit 5.67 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.39 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xiii, the representative Accused Product is labeled “MADE IN TAIWAN.”

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xiv. Importation and Sale of Products Infringing the '980 Patent

263. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2015-2017 Hyundai Sonata headlamps that infringe the '980 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.xiv. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503183C; TYC Part No. 20-9595-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

264. Exhibit 5.68 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.40 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xiv, the representative Accused Product is labeled "MADE IN TAIWAN."

xv. Importation and Sale of Products Infringing the '864 Patent

265. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Hyundai Tucson taillamps that infringe the '864 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.xv. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2802135C; TYC Part No. 17-5614-00-9) from the LKQ Online store. Exhibit 5.52 is an order receipt dated September 15, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

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266. Exhibit 5.69 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.41 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xv, the representative Accused Product is labeled “MADE IN TAIWAN.”

xvi. Importation and Sale of Products Infringing the ’865 Patent

267. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Hyundai Tucson headlamps that infringe the ’865 Patent. The LKQ Respondents’ Accused Products include, but are not limited to, at least one of the TYC Respondents’ Accused Products identified above in Section VII.A.xvi. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2502199C; TYC Part No. 20-9746-90-9) from the LKQ Online store. Exhibit 5.50 is an order receipt dated August 27, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

268. Exhibit 5.70 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.42 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xvi, the representative Accused Product is labeled “MADE IN TAIWAN.”

xvii. Importation and Sale of Products Infringing the ’292 Patent

269. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2018 Hyundai Elantra headlamps that infringe the ’292 Patent. The LKQ Respondents’ Accused Products include, but are not limited to, at least one of the TYC Respondents’ Accused Products identified above in Section VII.A.xvii. The

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Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503206C; TYC Part No. 20-9807-00-9) from the LKQ Online store. Exhibit 5.49 is an order receipt dated August 12, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

270. Exhibit 5.71 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.43 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xvii, the representative Accused Product is labeled “MADE IN TAIWAN.”

xviii. Importation and Sale of Products Infringing the ’351 Patent

271. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2018 Hyundai Elantra taillamps that infringe the ’351 Patent. The LKQ Respondents’ Accused Products include, but are not limited to, at least one of the TYC Respondents’ Accused Products identified above in Section VII.A.xviii. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2805142C; TYC Part No. 11-6903-00-9) from the LKQ Online store. Exhibit 5.50 is an order receipt dated August 27, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

272. Exhibit 5.72 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.44 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xviii, the representative Accused Product is labeled “MADE IN TAIWAN.”

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xix. Importation and Sale of Products Infringing the '163 Patent

273. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2018-21 Hyundai Accent headlamps that infringe the '163 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.xix. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503218; TYC Part No. 20-16343-00) from the LKQ Online store. Exhibit 5.51 is an order receipt dated September 9, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

274. Exhibit 5.73 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.45 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xix, the representative Accused Product is labeled "MADE IN TAIWAN."

xx. Importation and Sale of Products Infringing the '947 Patent

275. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2019 Hyundai Sonata headlamps that infringe the '947 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC Respondents' Accused Products identified above in Section VII.A.xx. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503217C; TYC Part No. 20-16159-00-9) from the LKQ Online store. Exhibit 5.50 is an order receipt dated August 27, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

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276. Exhibit 5.74 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.46 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xx, the representative Accused Product is labeled “MADE IN TAIWAN.”

xxi. Importation and Sale of Products Infringing the ’225 Patent

277. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2018-2020 Hyundai Kona headlamps that infringe the ’225 Patent. The LKQ Respondents’ Accused Products include, but are not limited to, at least one of the TYC Respondents’ Accused Products identified above in Section VII.A.xxi. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. HY2503223; TYC Part No. 20-16569-00) from the LKQ Online store. Exhibit 5.54 is an order receipt dated September 21, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from the LKQ Online store in the United States and delivered to an address in the United States.

278. Exhibit 5.75 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.47 shows the pictures of the product packaging and label of the representative Accused Product. As reproduced above in Section VII.A.xxi, the representative Accused Product is labeled “MADE IN TAIWAN.”

VIII. RELATED LITIGATION

279. Pursuant to 19 C.F.R. § 210.12(a)(5), the Complainants identify the following statements regarding the related litigations and brief summaries of those litigations.

280. On May 28, 2021, HMC filed a complaint in the United States District Court for the Central District of California, Case No. 8:21-cv-00959, asserting, *inter alia*, infringement of

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HMC's twenty (20) design patents by Respondents TYC and Genera. The Asserted Patents in this investigation overlap with sixteen (16) of those twenty design patents. This action is currently pending.

281. On June 11, 2021, LKQ and Keystone filed a complaint in the United States District Court for the Northern District of Illinois, Case No. 1:21-cv-03167, seeking declaratory judgment of noninfringement and/or invalidity of Hyundai's fifteen (15) U.S. design patents. The Asserted Patents in this investigation overlap with twelve (12) of those fifteen design patents. This action is currently pending.

IX. CLASSIFICATION UNDER THE HARMONIZED TARIFF SCHEDULE OF THE UNITED STATES

282. On information and belief, the Respondents' Accused Products are believed to fall within at least the following classification of the Harmonized Tariff Schedule of the United States: Classification No. 8512.20. The Harmonized Tariff Schedule number is for illustrative purposes only, and is not intended to be restrictive of the scope of the Accused Products.

X. DOMESTIC INDUSTRY

283. A domestic industry under 19 U.S.C. §§ 1337(a)(2)-(3)(C) exists by virtue of the actions of Hyundai and its suppliers in the United States related to automotive lamps protected by the Asserted Patents, including significant investment in plant and equipment, significant employment of labor or capital, and/or substantial investment in the exploitation of the Asserted Patents.

A. The Technical Prong

284. Hyundai has made, and continues to make, significant and substantial investments in plant and equipment, labor and capital, and engineering and research and development with

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respect to the products that practice one or more of the Asserted Patents (“Hyundai DI Products”).

285. Hyundai DI Products practice the Asserted Patents in the United States establishing the technical prong as defined in 19 U.S.C. § 1337(a)(2). Claim charts demonstrating how the representative Hyundai DI Products practice the Asserted Patents are attached as Exhibits 6.01-6.21, which are summarized in the table below. All other Hyundai DI Products practice the claims of the Asserted Patents substantially in the same manner as demonstrated in Exhibits 6.01-6.21.

Table 3 – Representative Hyundai DI Products

Asserted Patent	Representative Hyundai DI Product	Exhibit No.
The '478 Patent	921013Q000	6.01
The '8835 Patent	924023Q000	6.02
The '836 Patent	924010W500	6.03
The '583 Patent	921012S050	6.04
The '319 Patent	921024R050	6.05
The '812 Patent	921013Y000	6.06
The '5835 Patent	921021R010	6.07
The '690 Patent	92102A5050	6.08
The '217 Patent	921024Z010	6.09
The '436 Patent	92402C2000	6.10
The '003 Patent	921013Y510	6.11
The '057 Patent	921013X280	6.12
The '574 Patent	924013Y500	6.13
The '980 Patent	92102C2000	6.14
The '864 Patent	92404D3010	6.15
The '865 Patent	92101D3050	6.16
The '292 Patent	92102F3010	6.17

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Asserted Patent	Representative Hyundai DI Product	Exhibit No.
The '351 Patent	92402F2020	6.18
The '163 Patent	92101J0020	6.19
The '947 Patent	92102C2500	6.20
The '225 Patent	92102J9020	6.21

B. The Economic Prong

286. An industry in the United States under 19 U.S.C. § 1337(a)(3) exists by virtue of Hyundai's and its suppliers' significant and substantial investments directed to Hyundai's headlamps and taillamps that are protected by one or more of the Asserted Patents.

287. Vehicles include many components, including propulsion systems, seats, wheels, and headlamps and taillamps, among many others. Headlamps and taillamps represent only a portion of the total cost to manufacturer or maintain a vehicle in the United States, however, Federal and State laws require these lamps. For example, 49 C.F.R. § 571.108, titled "Lamps, reflective devices, and associated equipment," requires each vehicle to have headlamps and taillamps. *See, e.g.*, 49 C.F.R. § 571.108 Table I-A (Required Lamps and Reflective Devices). The stated purpose of this regulation is "to reduce traffic accidents and deaths and injuries resulting from traffic accidents, by providing adequate illumination of the roadway, and by enhancing the conspicuity of motor vehicles on the public roads so that their presence is perceived and their signals understood, both in daylight and in darkness or other conditions of reduced visibility." *Id.* at S2, Purpose.

288. Individual states also require headlamps and taillamps on vehicles. In the District of Columbia, for example, Municipal Regulation 18-703, titled "Lamps and Other Lighting Equipment," requires a vehicle to operate its headlamps and taillamps at night or when using the vehicle's windshield wipers. D.C. Mun. Regs. tit. 18, § 703. The Commonwealth of Virginia

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imposes similar requirements. *See* Va. Code. Ann. § 46.2-1030 (“When Lights to be lighted; number of lights to be lighted at any time; use of warning lights”). Most states require an annual vehicle inspection that ensures all passenger vehicles have properly working headlamps and taillamps, among other safety checks. *See, e.g.,* Va. Code. Ann. § 19, 30-70-140 (“Headlamps; except Motorcycles”). For example, an inspector in Virginia will reject “any motor vehicle [] not equipped with at least two headlamps of an approved type.” *Id.* As these examples show, headlamps and taillamps are essential components for vehicles that seek to operate on public roads in the United States.

289. Vehicle designers use the lamp design as a critical aspect in the creation of the overall look of a vehicle. The lamp design is fully integrated into the overall shape of the vehicle and serves as a primary visual design attribute of modern automobiles. In the U.S. automotive industry, where automakers vigorously compete for customers, a vehicle’s lamp design often serves as a marketing centerpiece.

i. Significant Investment in Plant and Equipment

290. Hyundai has made a significant investment in plant and equipment in connection with Hyundai’s headlamps and taillamps that are protected by one or more of the Asserted Patents as described below.

a. Mobis Parts America

291. Hyundai Mobis Co., Ltd. (“Hyundai Mobis”), a company under the Hyundai family of companies, forms the parts and service arm for Hyundai Motor Company and Kia Corporation. [REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The parts that are sourced through these authorized supply chains for the United States are Hyundai and Kia Genuine Parts. Ex. 7.03C, Confidential Declaration of Samuel Sohn, dated December 7, 2021 (“Sohn Decl.”), ¶ 3.

292. MPA has warehouses with a total of approximately [REDACTED] square feet for storage of Hyundai and Kia Genuine Parts, including headlamps and taillamps, located throughout the United States. *Id.* ¶ 4.

293. For the years 2017 through the first half of 2021, MPA has expended a total of approximately [REDACTED] to lease property utilized by the MPA headquarters and other MPA regional offices. *Id.* ¶ 5.

294. The average depreciated asset values for office, computer, service, demonstration, and other equipment utilized by MPA in its corporate headquarters office and in the warehouses and distribution centers for the years 2017 through the first half of 2021 are approximately \$[REDACTED] *Id.* ¶ 6.

295. For the years 2017 through October 2021, MPA has expended approximately a total of [REDACTED] as other operating expenses not included in the above, including, for example, utilities, outbound freight, packing material, auto expenses, insurance, legal & professional fees, bank fees, office expenses & supplies, and repairs & maintenance expenses. *Id.* ¶ 12.

296. In 2021, approximately [REDACTED] of MPA’s total sales of vehicle parts to Hyundai and Kia dealers in the United States are represented by headlamps and taillamps. *Id.* ¶ 13.

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297. From 2016 through the first half of 2021, MPA's total U.S. sales amount for the Hyundai lamps covered by Hyundai's Asserted Patents was approximately [REDACTED] *Id.* ¶ 15; *id.* Ex. A.

298. Table 4 below provides, for the years 2016 through the first half of 2021, MPA's U.S. sales for the Hyundai lamps covered by each Asserted Patent as a percentage of MPA's total U.S. sales of all Hyundai parts over that same time period. *Id.* ¶¶ 14, 16; *id.* Exs. A, C.

Table 4 – Revenue Percentage for Hyundai Lamps Covered by Each Asserted Patent

Asserted Patent	2016-21 Revenue Percentage
The '478 Patent	[REDACTED]
The '8835 Patent	[REDACTED]
The '836 Patent	[REDACTED]
The '583 Patent	[REDACTED]
The '319 Patent	[REDACTED]
The '812 Patent	[REDACTED]
The '5835 Patent	[REDACTED]
The '690 Patent	[REDACTED]
The '217 Patent	[REDACTED]
The '436 Patent	[REDACTED]
The '003 Patent	[REDACTED]
The '057 Patent	[REDACTED]
The '574 Patent	[REDACTED]
The '980 Patent	[REDACTED]
The '063 Patent	[REDACTED]
The '864 Patent	[REDACTED]
The '865 Patent	[REDACTED]
The '292 Patent	[REDACTED]
The '351 Patent	[REDACTED]
The '163 Patent	[REDACTED]
The '947 Patent	[REDACTED]
The '225 Patent	[REDACTED]

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b. HMMA

299. Nearly half of all Hyundai vehicles sold in the United States are also manufactured in the United States by Hyundai Motor Manufacturing Alabama, LLC (“HMMA”), a wholly-owned subsidiary of HMA located in Montgomery, Alabama. HMMA has invested \$1.7 billion dollars to create a domestic automotive plant capable of producing up to 399,500 Hyundai vehicles per year when running at full capacity. Ex. 7.01C, Confidential Declaration of Jim Carter, dated December 13, 2021 (“Carter Decl.”), ¶ 3.

300. HMMA’s production facility has an area of approximately 2 million square-feet and resides on 1,744 acres of land. It includes a stamping facility, a paint shop, a vehicle assembly shop, a two-mile test track and two engine shops. HMMA’s production facility also includes significant dedicated space for storage of Authorized Hyundai Genuine Parts, including headlamps and taillamps. *Id.* ¶ 5.

301. HMMA has also made significant investments in equipment necessary for fulfilling its corporate purpose and operations in the United States. The average depreciated asset values for machinery and other equipment utilized by HMMA for the years 2016 through the first half of 2021 (through June) is [REDACTED]. This machinery and other equipment are used for manufacturing Hyundai vehicles and includes equipment used for installment, testing, and quality control of Hyundai headlamps and taillamps. *Id.* ¶ 27.

302. From 2016 through Q2 2019, approximately [REDACTED] of the vehicles sold in the United States were domestically manufactured by HMMA in Montgomery, Alabama. HMMA utilizes Authorized Hyundai Genuine Parts, including headlamps and taillamps, that are specifically designed and packaged for sale and use in the United States in manufacturing Hyundai vehicles. *Id.* ¶¶ 46-47.

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303. The total number of Hyundai vehicles produced by HMMA in Alabama and sold to dealers from the years 2016 through 2021 (through July) was approximately [REDACTED]. The gross revenue from these vehicles made in Alabama for the years 2016 through 2021 (through July) was approximately \$[REDACTED]. *Id.* ¶¶ 50, 52, 54, 56-57. From 2016 through 2019, an additional [REDACTED] Hyundai vehicles were produced by Kia Georgia, Inc. in West Point, Georgia and sold to dealers. The gross revenue from those vehicles made in Georgia for the years 2016-2019 was approximately [REDACTED]. *Id.* ¶¶ 49, 51, 53, 55.

c. HMA

304. HMA is a California corporation formed in 1985 and has its headquarters in Fountain Valley, California. HMA is a wholly owned subsidiary of HMC. HMA is responsible for marketing, distribution, product planning research, sales and service-related engineering functions for Hyundai vehicles in the United States, as well as the promotion and facilitation of its vehicle warranty programs and quality control for Hyundai vehicles in the United States. *Id.* ¶ 8.

305. HMA owns the building and land from which it operates its Fountain Valley, California corporate offices (the “Fountain Valley Campus”). The Fountain Valley Campus serves as HMA’s headquarters in the United States and houses HMA’s divisions encompassing Customer Experience; Marketing; Finance; Product, Corporate & Digital Planning; Legal; Human Resources & Administration; Internal Audit; General Affairs, Government Relations & Diversity; and Communications. *Id.* ¶¶ 9-18.

306. Since the late 1980’s, HMA has expended significant resources in the purchase and development of the Fountain Valley Campus. The land itself was initially purchased in 1989 for approximately \$[REDACTED] and HMA expended approximately [REDACTED] in building

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and land improvements between 1989 and 2010. In or about 2014, HMA replaced its original corporate offices and invested over [REDACTED] in a newly designed campus enclosing an all-new 500,000 square-foot office building. *Id.* ¶ 19.

307. In addition to its corporate headquarters, HMA has seven regional offices located across the United States. These regional offices are responsible for overseeing and managing all regional activities regarding sales performance, product distribution, parts marketing, service, training, and customer satisfaction. The regional offices offer strategic direction to particular geographic regions in alignment with HMA’s national objectives. *Id.* ¶¶ 20-22.

308. For the years 2016 through the first half of 2021, HMA has expended a total of approximately [REDACTED] to lease property utilized by its regional offices. *Id.* ¶ 23.

309. HMA also owns additional real estate in California, including Irvine and California City. The Hyundai Design and Technical Center, located in Irvine, which consists of approximately 90,000 square feet, was purchased in or about 2001 for approximately [REDACTED] [REDACTED] and is currently utilized by Hyundai America Technical Center, Inc. (“HATCI”), a wholly-owned subsidiary of HMC, for vehicle design R&D. HMA purchased the land for the Irvine property and subsequently built the building per HATCI’s requirements. The California City property is situated in the Mojave Desert and serves as HATCI’s California Proving Grounds where full vehicle evaluations, durability, and development testing occur on its 4,500-acre facility. *Id.* ¶ 24.

310. HMA also leases to HATCI a 227,873 square-foot facility located in Superior Township, Michigan, which serves as HATCI’s main R&D center. HMA purchased this Michigan property in 2004 for approximately [REDACTED] *Id.* ¶ 25.

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311. HMA has also made significant investments in equipment necessary for fulfilling its corporate purpose and operations in the United States. The average depreciated asset values for office, computer, service, demonstration, and other equipment utilized by HMA in its corporate office and in its regional offices for the years 2016 through the first half of 2021 is approximately [REDACTED]. This equipment was used to support and direct HMA's operations, distribution, marketing, advertising, sales, and warranty activities for Hyundai vehicles and Hyundai Genuine Parts, including headlamps and taillamps. *Id.* ¶¶ 26, 28.

312. HMA markets and distributes Hyundai vehicles across the United States through its authorized dealer network and provides warranty services on all new Hyundai vehicles in the United States. From 2016 through 2021 (through July), HMA sold a total of approximately [REDACTED] vehicles to U.S. dealers. The approximate gross revenue from these wholesale activities is [REDACTED]. *Id.* ¶¶ 58-64.

d. SL America

313. For Hyundai vehicle models manufactured in the United States, a certain number of headlamps and taillamps are supplied by SL America Corporation ("SLC"), which manufactures those headlamps and taillamps in the United States. Founded in 2000, SLC manufactures vehicle headlights, taillights, chassis, and mirrors, among other things, in the United States and supplies them to vehicle manufacturers such as Hyundai, Kia, and General Motors. SLC has two U.S. manufacturing plants in Clinton, Tennessee, and Alexander City, Alabama, and an engineering center in Auburn Hills, Michigan. SLC has about 2,000 employees across all of its locations and generates about \$383 million in annual sales. SLC has been manufacturing the headlamps and taillamps in the United States and supplying those lamps to Hyundai for its vehicles since the 2012 vehicle models. For example, SLC has manufactured

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and supplied at least the following headlamps and taillamps in the United States that are covered by one or more of the Asserted Patents:

Table 5 – Exemplary Lamps Manufactured and Supplied by SLC in the U.S.

Hyundai Part No.	Hyundai Model	Model Year	Part Description	Asserted Patent
921014Z010	Santa Fe	2012	Headlamp	The '217 Patent
921024Z010	Santa Fe	2012	Headlamp	The '217 Patent
921014Z100	Santa Fe	2012	Headlamp	The '217 Patent
921024Z100	Santa Fe	2012	Headlamp	The '217 Patent
92101C2000	Sonata	2014	Headlamp	The '980 Patent
92102C2000	Sonata	2014	Headlamp	The '980 Patent
92101C2050	Sonata	2014	Headlamp	The '980 Patent
92102C2050	Sonata	2014	Headlamp	The '980 Patent
92401C2000	Sonata	2014	Taillamp (RCO)	The '436 Patent
92402C2000	Sonata	2014	Taillamp (RCO)	The '436 Patent
92101C2500	Sonata	2017	Headlamp	The '947 Patent
92102C2500	Sonata	2017	Headlamp	The '947 Patent
924013Y500	Elantra	2013	Taillamp (RCO)	The '574 Patent
924023Y500	Elantra	2013	Taillamp (RCO)	The '574 Patent

e. Allocation of Plant and Equipment Expenses to Each Asserted Patent

314. As described above, the sum of MPA's lease expenses (¶ 293), equipment values (¶ 294), other operating expenses (¶ 295); HMMA's equipment values (¶ 301); and HMA's lease expenses (¶ 308) and equipment values (¶ 311) total to \$ [REDACTED]. Table 6 below allocates that total expense amount to each of the Asserted Patents by using the percentages calculated in Table 4 above.

Table 6 – Allocation of Plant and Equipment Expenses to Each Asserted Patent

Asserted Patent	2016-21 Revenue Percentage (From Table 4)	Plant and Equipment Expenses Allocated to Each Patent
The '478 Patent	[REDACTED]	[REDACTED]
The '8835 Patent	[REDACTED]	[REDACTED]
The '836 Patent	[REDACTED]	[REDACTED]
The '583 Patent	[REDACTED]	[REDACTED]
The '319 Patent	[REDACTED]	[REDACTED]

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Asserted Patent	2016-21 Revenue Percentage (From Table 4)	Plant and Equipment Expenses Allocated to Each Patent
The '812 Patent		
The '5835 Patent		
The '690 Patent		
The '217 Patent		
The '436 Patent		
The '003 Patent		
The '057 Patent		
The '574 Patent		
The '980 Patent		
The '063 Patent		
The '864 Patent		
The '865 Patent		
The '292 Patent		
The '351 Patent		
The '163 Patent		
The '947 Patent		
The '225 Patent		

ii. Significant Employment of Labor

a. Mobis Parts America

315. From 2017 through the first half of 2021, MPA employed an average of approximately [REDACTED] employees at its headquarters in Fountain Valley, California, and at its warehouses and distribution centers. MPA's total combined annual payroll for those years is approximately [REDACTED] Ex. 7.04C, Sohn Decl., ¶¶ 7-11.

b. HMMA

316. HMMA employees are responsible for manufacturing Hyundai vehicles, sourcing component parts, and operating HMMA's stamping shop, welding facility, paint shop, general assembly facility, and engine shops in Montgomery, Alabama. All HMMA employees work directly or indirectly on the manufacture of Hyundai vehicles. From 2016 through 2021, HMMA

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employed an average of [REDACTED] employees. Its combined gross payroll for the years 2016 through 2019 is \$ [REDACTED]. Ex. 7.01C, Carter Decl., ¶¶ 29-35.

c. HMA

317. HMA's corporate and regional office employees are responsible for, among other things, operations, marketing, customer service, parts distribution, dealer support, and facilitating HMA's warranty programs. All of these activities directly or indirectly support Hyundai products, including Hyundai headlamps and taillamps. Ex. 7.01C, Carter Decl., ¶ 36.

318. From the years 2018 through 2021 (through July), HMA employed an average of approximately [REDACTED] employees at its headquarters in Irvine, California and at its regional offices, with a total combined annual gross pay of [REDACTED] over those years. *Id.* ¶¶ 37-42.

319. HMA operates two types of call centers from its Fountain Valley, California, headquarters and other U.S. locations. First, HMA has what is known as a "tech line" for dealers and their technicians to use in obtaining assistance from HMA on vehicle repair and warranty work questions. Second, HMA has retail-facing call centers for customers and vehicle owners to use in answering common vehicle questions and addressing concerns about their purchased vehicles, including warranty and Bluelink related inquiries. HMA's total combined expenditures in connection with HMA's two call centers for the years 2016 through the first half of 2021 was approximately \$ [REDACTED]. *Id.* ¶¶ 44-45.

320. HMA sells replacement Hyundai Genuine Parts, including headlamps and taillamps, sourced through MPA throughout the United States. These parts are used for repairs to customer vehicles, including repairs performed according to HMA's vehicle warranty programs. The total expenditures paid to Hyundai dealers in the United States for repairs and services performed under HMA's vehicle warranty program for the years 2017 through 2021 (through

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July) are approximately [REDACTED] *Id.* ¶¶ 73-77. HMA's sales of replacement parts used for repairs to customer vehicles during that time period total approximately [REDACTED]. *Id.* ¶¶ 66-72.

d. Allocation of Labor Expenses to Each Asserted Patent

321. As described above, the sum of MPA's payroll (¶ 315), HMMA's payroll (¶ 316), and HMA's payroll (¶ 318) total to \$[REDACTED]. Table 7 below allocates that total labor expense amount to each of the Asserted Patents by using the percentages calculated in Table 4 above.

Table 7 – Allocation of Labor Expenses to Each Asserted Patent

Asserted Patent	2016-21 Revenue Percentage (from Table 4)	Labor Expenses Allocated to Each Patent
The '478 Patent	[REDACTED]	[REDACTED]
The '8835 Patent	[REDACTED]	[REDACTED]
The '836 Patent	[REDACTED]	[REDACTED]
The '583 Patent	[REDACTED]	[REDACTED]
The '319 Patent	[REDACTED]	[REDACTED]
The '812 Patent	[REDACTED]	[REDACTED]
The '5835 Patent	[REDACTED]	[REDACTED]
The '690 Patent	[REDACTED]	[REDACTED]
The '217 Patent	[REDACTED]	[REDACTED]
The '436 Patent	[REDACTED]	[REDACTED]
The '003 Patent	[REDACTED]	[REDACTED]
The '057 Patent	[REDACTED]	[REDACTED]
The '574 Patent	[REDACTED]	[REDACTED]
The '980 Patent	[REDACTED]	[REDACTED]
The '063 Patent	[REDACTED]	[REDACTED]
The '864 Patent	[REDACTED]	[REDACTED]
The '865 Patent	[REDACTED]	[REDACTED]
The '292 Patent	[REDACTED]	[REDACTED]
The '351 Patent	[REDACTED]	[REDACTED]
The '163 Patent	[REDACTED]	[REDACTED]
The '947 Patent	[REDACTED]	[REDACTED]

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Asserted Patent	2016-21 Revenue Percentage (from Table 4)	Labor Expenses Allocated to Each Patent
The '225 Patent		

iii. Substantial Investment in Exploitation of the Asserted Patents, Including Engineering, Research and Development

322. As described below, Hyundai has made substantial investments in the exploitation of the Asserted Patents in the United States through various warranty, quality assurance, design, research and development, and marketing activities relating to Hyundai vehicles and parts, including headlamps and taillamps.

323. Hyundai exploits the Asserted Patents through its warranty and quality assurance services by allowing customers to obtain replacement lamps with the unique visual ornamental design protected by those patents. The total expenditures paid to Hyundai dealers in the United States for repairs and services performed under HMA's vehicle warranty program for the years 2016 through 2021 (through July) are approximately [REDACTED] Ex. 7.01C, Carter Decl., ¶¶ 73-77.

324. Table 8 below allocates the total expenditures paid to Hyundai dealers in the United States for repairs and services performed under HMA's vehicle warranty program for the years 2016 through 2021 (through July) in the amount of [REDACTED] to each of the Asserted Patents by using the percentages calculated in Table 4 above.

Table 8 – Allocation of Warranty Expenses to Each Asserted Patent

Asserted Patent	2016-21 Revenue Percentage (From Table 4)	Warranty Expenses Allocated to Each Patent
The '478 Patent		
The '8835 Patent		
The '836 Patent		
The '583 Patent		

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Asserted Patent	2016-21 Revenue Percentage (From Table 4)	Warranty Expenses Allocated to Each Patent
The '319 Patent		
The '812 Patent		
The '5835 Patent		
The '690 Patent		
The '217 Patent		
The '436 Patent		
The '003 Patent		
The '057 Patent		
The '574 Patent		
The '980 Patent		
The '063 Patent		
The '864 Patent		
The '865 Patent		
The '292 Patent		
The '351 Patent		
The '163 Patent		
The '947 Patent		
The '225 Patent		

325. Hyundai has made a substantial investment in the United States for advertising, marketing, and promoting its vehicles, which include the headlamps and taillamps covered by the Asserted Patents, during sports, cultural and other programs in the United States. *Id.*, ¶¶ 78-83. A significant factor in that advertising, marketing, and promoting is the ornamental design of Hyundai automobiles, including the ornamental design of the headlamps and taillamps. Designers use the lamp design as a critical aspect in the creation of the overall look of a vehicle. The lamp design is fully integrated into the overall shape of the vehicle and serves as a primary visual design attribute of modern automobiles. In the U.S. automotive industry, where automakers vigorously compete for customers, a vehicle's lamp design often serves as a marketing centerpiece. Hyundai exploits the Asserted Patents protecting its ornamental lamp designs by promoting those ornamental designs in its marketing and advertising.

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326. Hyundai has also made a substantial investment in the United States for engineering, research, and design activities for its vehicles and parts, including headlamps and taillamps. HATCI is the design, technology, and engineering arm for all North American models of Hyundai and Kia vehicles. HATCI supports the development of current and new Hyundai and Kia products for the U.S. market in areas such as research and analysis, design, emissions, durability testing, and regulatory certification. Ex. 7.03C, Hong Decl., ¶¶ 1-3.

327. The Hyundai America Design & Engineering Center in Irvine, California is currently utilized by HATCI for vehicle design R&D. HATCI also operates the California Proving Grounds, located 100 miles north of Los Angeles in the Mojave Desert, for Hyundai and Kia vehicles, where full vehicle evaluations, durability, and development testing occur on its 4,500-acre, \$60 million facility. The grounds include a 6.4-mile oval track, 2 million square-foot Vehicle Dynamics Area (VDA), a 2.75-mile winding track, a 3.3-mile hill road and various special surface roads constructed to duplicate U.S. highways. *Id.* ¶¶ 5-6.

328. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

329. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

330. Since 2012, exemplary expenses by HATCI for R&D and design activities in the United States relating to lighting products for Hyundai vehicles include approximately [REDACTED] relating to lighting products for the Hyundai Santa Cruz, Hyundai Palisade, Hyundai Kona, Hyundai Elantra (AD and ADa), Hyundai Tucson (TL and TLa), and Hyundai Santa Fe (TM and TMa). *Id.* ¶¶ 9-16.

331. Since 2016, HMA has expended over [REDACTED] dollars on advertising (another subset of overall marketing costs) its brand of vehicles in the United States. Ex. 7.01C, Carter Decl., ¶ 83. Table 9 below allocates that [REDACTED] amount to each of the Asserted Patents by using the percentages calculated in Table 4 above.

Table 9 – Allocation of Advertising Expenses to Each Asserted Patent

Asserted Patent	2016-21 Revenue Percentage (from Table 4)	Advertising Expenses Allocated to Each Patent
The '478 Patent	[REDACTED]	[REDACTED]

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Asserted Patent	2016-21 Revenue Percentage (from Table 4)	Advertising Expenses Allocated to Each Patent
The '8835 Patent		
The '836 Patent		
The '583 Patent		
The '319 Patent		
The '812 Patent		
The '5835 Patent		
The '690 Patent		
The '217 Patent		
The '436 Patent		
The '003 Patent		
The '057 Patent		
The '574 Patent		
The '980 Patent		
The '063 Patent		
The '864 Patent		
The '865 Patent		
The '292 Patent		
The '351 Patent		
The '163 Patent		
The '947 Patent		
The '225 Patent		

332. In view of the foregoing, it is apparent that Hyundai has made a significant investment in domestic facilities and equipment, a significant investment in employment of labor, significant investment in capital, and a substantial investment in the exploitation, including warranty, quality assurance, advertising, marketing and enforcement of the Asserted Patents in the United States with respect to products protected by the Asserted Patents, thereby establishing a domestic industry within the meaning of 19 U.S.C. § 1337 (a)(3).

XI. REQUEST FOR RELIEF

333. WHEREFORE, Hyundai respectfully requests that the United States International Trade Commission:

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- A. Institute an immediate investigation pursuant to Section 337(b)(1) of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, into the violation by Respondents of Section 337 arising from the importation into the United States, sale for importation, and/or sale within the United States after importation of Respondent's products that infringe one or more of the Asserted Patents;
- B. Schedule and conduct a hearing pursuant to Section 337(c) for purposes of receiving evidence and hearing argument concerning whether there has been a violation of Section 337 and, following the hearing, determine that there has been a violation of Section 337;
- C. Issue a permanent limited exclusion order, pursuant to Section 337(d)(1), forbidding entry into the United States of all replacement lamps made, have made, imported, sold for importation, and/or sold after importation by Respondents that infringe one or more of the Asserted Patents;
- D. Issue permanent cease and desist orders, pursuant to Section 337(f), directing each Respondent, or others acting on its behalf, to cease and desist from importing, marketing, advertising, demonstrating, distributing, warehousing inventory for distribution, selling, offering for sale, using, or transferring (except for export) in the United States of replacement lamps that infringe one or more of the Asserted Patents;
- E. Impose a bond during the 60-day Presidential review period pursuant to Sections 337(e)(1) and 337(f)(1) to prevent further injury to Hyundai's domestic industry relating to the Asserted Patents; and

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- F. Grant all such other and further relief as the Commission deems appropriate under the law, based upon the facts complained of herein and as determined by the investigation.

Dated: December 16, 2021

Respectfully submitted,

/s/ P. Andrew Riley

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VERIFICATION OF COMPLAINT

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

1. I am a Senior Counsel at Hyundai Motor Company's Intellectual Property Legal Team in Seoul, Korea, and am duly authorized to sign this Complaint on behalf of Hyundai;
2. I have read the foregoing Complaint and am aware of its contents;
3. To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the allegations and other factual contentions of the foregoing Complaint have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery;
4. To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, 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 the investigation or any related proceeding; and
5. To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the claims, defenses, and other legal contentions set forth within the Complaint are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law.

Executed on this 16 day of December 2021.



Seungdo Kim