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December 15, 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 Kia Corporation and Kia America, Inc. (collectively, “Kia” or “Complainants”) are a Complaint and related documents in support of Kia’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, Kia submits the following documents for filing through the Commission’s Electronic Document Information System (EDIS):

1. Kia’s letter and certification requesting confidential treatment of the information contained in confidential Complaint and confidential Exhibits 7.01C, 7.02C, 7.03C, and 7.04C to the Complaint pursuant to 19 C.F.R. §§ 201.6(b) and 210.5(d);
2. Kia’s Public Interest Statement pursuant to 19 C.F.R. § 210.8(b);
3. Kia’s verified confidential Complaint pursuant to 19 C.F.R. §§ 210.8(a)(1)(ii) and 210.12(a);
4. Kia’s confidential Exhibits 7.01C, 7.02C, 7.03C, and 7.04C to the Complaint pursuant to 19 C.F.R. § 210.8(a)(1)(ii);
5. Kia’s public version of the verified confidential Complaint pursuant to 19 C.F.R. § 210.8(a)(1)(i); and

6. Kia's non-confidential Exhibits to the Complaint and public versions of confidential Exhibits 7.01C, 7.02C, 7.03C, and 7.04C to the Complaint pursuant to 19 C.F.R. § 210.8(a)(1)(i).

In addition, Kia 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 Nos. D592,773, D635,701, D636,506, D650,931, D695,933, D705,963, D709,218, D714,975, D714,976, D720,871, D749,757, D749,762, D749,764, D774,222, D774,223, D776,311, D781,471, D785,833, D785,836, and D792,989 ("Asserted Patents"), as Appendices A-T; and
- B. Copies of the patents and technical reference documents identified in the prosecution histories of the Asserted Patents, as Appendices A.1-T.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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The Honorable Lisa R. Barton
Secretary to the Commission
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500 E Street, SW
Room 112A
Washington, DC 20436

VIA EDIS

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

Dear Secretary Barton:

We are counsel for Complainants Kia Corporation and Kia America, Inc. (collectively, “Kia”). In accordance with Commission Rules 210.5(d) and 201.6, Kia requests confidential treatment of the information contained in the confidential Complaint and confidential Exhibits 7.01C, 7.02C, 7.03C, and 7.04C to the Complaint.

The information for which confidential treatment is sought involves proprietary and sensitive information regarding Kia’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 Kia; 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, 7.03C, and 7.04C is not reasonably available to the public.

The Honorable Lisa R. Barton
December 15, 2021
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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 Kia Corporation and Kia
America, Inc.*

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

In the Matter of

CERTAIN REPLACEMENT
AUTOMOTIVE LAMPS

Investigation No. 337-TA-_____

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

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

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

Table 1- Listing of Kia's Asserted Patents

Asserted Patent	Exhibit No.
U.S. Design Patent No. D592,773 (“the ’773 Patent)	1.01
U.S. Design Patent No. D635,701 (“the ’701 Patent)	1.02
U.S. Design Patent No. D636,506 (“the ’506 Patent)	1.03
U.S. Design Patent No. D650,931 (“the ’931 Patent)	1.04
U.S. Design Patent No. D695,933 (“the ’933 Patent)	1.05
U.S. Design Patent No. D705,963 (“the ’963 Patent)	1.06
U.S. Design Patent No. D709,218 (“the ’218 Patent)	1.07
U.S. Design Patent No. D714,975 (“the ’975 Patent)	1.08
U.S. Design Patent No. D714,976 (“the ’976 Patent)	1.09
U.S. Design Patent No. D720,871 (“the ’871 Patent)	1.10
U.S. Design Patent No. D749,757 (“the ’757 Patent)	1.11
U.S. Design Patent No. D749,762 (“the ’762 Patent)	1.12
U.S. Design Patent No. D749,764 (“the ’764 Patent)	1.13
U.S. Design Patent No. D774,222 (“the ’222 Patent)	1.14
U.S. Design Patent No. D774,223 (“the ’223 Patent)	1.15
U.S. Design Patent No. D776,311 (“the ’311 Patent)	1.16

Asserted Patent	Exhibit No.
U.S. Design Patent No. D781,471 (“the ’471 Patent)	1.17
U.S. Design Patent No. D785,833 (“the ’833 Patent)	1.18
U.S. Design Patent No. D785,836 (“the ’836 Patent)	1.19
U.S. Design Patent No. D792,989 (“the ’989 Patent)	1.20

The proposed Respondents have unlawfully imported, sold for importation, and sold after importation the Accused Products. Kia 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 Kia requests would protect Kia’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. Kia is committed to serving the U.S. market—Kia manufactures in the United States, the following Kia models that have automotive lamps covered by the Asserted Patents: Optima (2011-18) and Sorento (2014-18). In addition, Kia regularly services and repairs Kia vehicles using genuine Kia automotive lamps throughout the United States.

Kia 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 Kia’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 Kia are not contrary to the public interest because: (1) the Accused Products infringe one or more of Kia’s Asserted Patents and are automotive lamps that are not necessary for any health or welfare need, (2) genuine U.S. Kia replacement automotive parts are readily available, and (3) the Accused Products are a small portion of the market and Kia 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 Kia’s Asserted Patents under 35 U.S.C. § 271. Starting in model year 2010, Kia has manufactured and sold certain vehicles with 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 Kia 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 Kia replacement automotive lamps. Kia is more than capable of supplying the market as Kia and its authorized suppliers already are meeting market demand for Kia 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, Kia can replace those infringing automotive lamps with genuine Kia 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 Kia’s requested remedial orders, U.S. consumers would continue to have access to genuine Kia replacement automotive lamps. Kia can supply the market for Kia replacement automotive lamps as Kia and its authorized suppliers are already meeting market demand and have the adequate capacity to increase manufacturing if necessary.

Kia 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 Kia.

Dated: December 15, 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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PUBLIC VERSION

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LIST OF EXHIBITS

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1.01	Certified Copy of U.S. Design Patent No. D592,773
1.02	Certified Copy of U.S. Design Patent No. D635,701
1.03	Certified Copy of U.S. Design Patent No. D636,506
1.04	Certified Copy of U.S. Design Patent No. D650,931
1.05	Certified Copy of U.S. Design Patent No. D695,933
1.06	Certified Copy of U.S. Design Patent No. D705,963
1.07	Certified Copy of U.S. Design Patent No. D709,218
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1.09	Certified Copy of U.S. Design Patent No. D714,976
1.10	Certified Copy of U.S. Design Patent No. D720,871
1.11	Certified Copy of U.S. Design Patent No. D749,757
1.12	Certified Copy of U.S. Design Patent No. D749,762
1.13	Certified Copy of U.S. Design Patent No. D749,764
1.14	Certified Copy of U.S. Design Patent No. D774,222
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1.16	Certified Copy of U.S. Design Patent No. D776,311
1.17	Certified Copy of U.S. Design Patent No. D781,471
1.18	Certified Copy of U.S. Design Patent No. D785,833
1.19	Certified Copy of U.S. Design Patent No. D785,836
1.20	Certified Copy of U.S. Design Patent No. D792,989
2.01	Certified Copy of Assignment of U.S. Design Patent No. D592,773 to Kia Motors Corporation ¹
2.02	Certified Copy of Assignment of U.S. Design Patent No. D635,701 to Kia Motors Corporation
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2.09	Certified Copy of Assignment of U.S. Design Patent No. D714,976 to Kia Motors Corporation
2.10	Certified Copy of Assignment of U.S. Design Patent No. D720,871 to Kia Motors Corporation

¹ Kia Motors Corporation has since changed its name to Kia Corporation.

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Exhibit No.	Description
2.11	Certified Copy of Assignment of U.S. Design Patent No. D749,757 to Kia Motors Corporation
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2.19	Certified Copy of Assignment of U.S. Design Patent No. D785,836 to Kia Motors Corporation
2.20	Certified Copy of Assignment of U.S. Design Patent No. D792,989 to Kia Motors Corporation
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 Kia-branded Vehicles
3.03	Exemplary Bills of Landing for Shipments from TYC Brothers Industrial Co., Ltd. in Taiwan to Genera Corporation in United States
3.04	Screenshots of Genera Corporation's Relevant Webpages
3.05	Genera Corporation's Statement of Information Filed at California Secretary of State
3.06	TYC Brothers Industrial Co., Ltd.'s Consolidated Financial Statements for Years 2019 and 2020
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3.09	Screenshots of LKQ Corporation's Relevant Webpages
4.01	Infringement Claim Chart for U.S. Design Patent No. D592,773
4.02	Infringement Claim Chart for U.S. Design Patent No. D635,701
4.03	Infringement Claim Charts for U.S. Design Patent No. D636,506
4.04	Infringement Claim Chart for U.S. Design Patent No. D650,931
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4.08	Infringement Claim Chart for U.S. Design Patent No. D714,975
4.09	Infringement Claim Chart for U.S. Design Patent No. D714,976
4.10	Infringement Claim Chart for U.S. Design Patent No. D720,871

PUBLIC VERSION

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4.19	Infringement Claim Chart for U.S. Design Patent No. D785,836
4.20	Infringement Claim Chart for U.S. Design Patent No. D792,989
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. 20-9117-00-9
5.07	Printouts of Product Description for TYC Part No. 20-9306-00-9
5.08	Printouts of Product Description for TYC Part No. 20-12559-00
5.09	Printouts of Product Description for TYC Part No. 20-12733-00-9
5.10	Printouts of Product Description for TYC Part No. 11-6604-00-9
5.11	Printouts of Product Description for TYC Part No. 11-6613-00-9
5.12	Printouts of Product Description for TYC Part No. 20-9460-90-9
5.13	Printouts of Product Description for TYC Part No. 20-9516-00-9
5.14	Printouts of Product Description for TYC Part No. 11-6651-00-9
5.15	Printouts of Product Description for TYC Part No. 11-6726-00-9
5.16	Printouts of Product Description for TYC Part No. 11-6763-00-9
5.17	Printouts of Product Description for TYC Part No. 17-5564-00-9
5.18	Printouts of Product Description for TYC Part No. 11-6780-00-9
5.19	Printouts of Product Description for TYC Part No. 20-9891-00-9
5.20	Printouts of Product Description for TYC Part No. 11-6956-00-9
5.21	Printouts of Product Description for TYC Part No. 20-9822-00-9
5.22	Printouts of Product Description for TYC Part No. 11-6911-00-9
5.23	Printouts of Product Description for TYC Part No. 20-9905-00-9
5.24	Printouts of Product Description for TYC Part No. 17-5719-00-9
5.25	Printouts of Product Description for TYC Part No. 17-5546-00-9
5.26	Pictures of Product Packaging and Label of TYC Part No. 20-9117-00-9
5.27	Pictures of Product Packaging and Label of TYC Part No. 20-9306-00-9
5.28	Pictures of Product Packaging and Label of TYC Part No. 20-12559-00
5.29	Pictures of Product Packaging and Label of TYC Part No. 20-12733-00-9
5.30	Pictures of Product Packaging and Label of TYC Part No. 11-6604-00-9
5.31	Pictures of Product Packaging and Label of TYC Part No. 11-6613-00-9
5.32	Pictures of Product Packaging and Label of TYC Part No. 20-9460-90-9
5.33	Pictures of Product Packaging and Label of TYC Part No. 20-9516-00-9
5.34	Pictures of Product Packaging and Label of TYC Part No. 11-6651-00-9

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Exhibit No.	Description
5.35	Pictures of Product Packaging and Label of TYC Part No. 11-6726-00-9
5.36	Pictures of Product Packaging and Label of TYC Part No. 11-6763-00-9
5.37	Pictures of Product Packaging and Label of TYC Part No. 17-5564-00-9
5.38	Pictures of Product Packaging and Label of TYC Part No. 11-6780-00-9
5.39	Pictures of Product Packaging and Label of TYC Part No. 20-9891-00-9
5.40	Pictures of Product Packaging and Label of TYC Part No. 11-6956-00-9
5.41	Pictures of Product Packaging and Label of TYC Part No. 20-9822-00-9
5.42	Pictures of Product Packaging and Label of TYC Part No. 11-6911-00-9
5.43	Pictures of Product Packaging and Label of TYC Part No. 20-9905-00-9
5.44	Pictures of Product Packaging and Label of TYC Part No. 17-5719-00-9
5.45	Pictures of Product Packaging and Label of TYC Part No. 17-5546-00-9
5.46	Order Confirmation and Invoice for Purchase of Accused Products on June 18, 2021
5.47	Order Confirmation and Invoice for Purchase of Accused Products on August 12, 2021
5.48	Order Confirmation and Invoice for Purchase of Accused Products on August 27, 2021
5.49	Order Confirmation and Invoice for Purchase of Accused Products on September 9, 2021
5.50	Order Confirmation and Invoice for Purchase of Accused Products on September 14, 2021
5.51	Order Confirmation and Invoice for Purchase of Accused Products on September 15, 2021
5.52	Order Confirmation and Invoice for Purchase of Accused Products on September 22, 2021
5.53	Printouts of Product Description for LKQ Part No. KI2503141C
5.54	Printouts of Product Description for LKQ Part No. KI2502157C
5.55	Printouts of Product Description for LKQ Part No. KI2502184C
5.56	Pictures of Product Packaging and Label of LKQ Part No. KI2502184C
5.57	Printouts of Product Description for LKQ Part No. KI2503152C
5.58	Printouts of Product Description for LKQ Part No. KI2804112C
5.59	Printouts of Product Description for LKQ Part No. KI2805111C
5.60	Printouts of Product Description for LKQ Part No. KI2502171C
5.61	Printouts of Product Description for LKQ Part No. KI2502167C
5.62	Printouts of Product Description for LKQ Part No. KI2801141C
5.63	Printouts of Product Description for LKQ Part No. KI2804114C
5.64	Printouts of Product Description for LKQ Part No. KI2805117C
5.65	Printouts of Product Description for LKQ Part No. KI2802108C
5.66	Printouts of Product Description for LKQ Part No. KI2804119C
5.67	Printouts of Product Description for LKQ Part No. KI2503196C
5.68	Pictures of Product Packaging and Label of LKQ Part No. KI2503196C
5.69	Printouts of Product Description for LKQ Part No. KI2805130C
5.70	Pictures of Product Packaging and Label of LKQ Part No. KI2805130C
5.71	Printouts of Product Description for LKQ Part No. KI2502198C

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Exhibit No.	Description
5.72	Printouts of Product Description for LKQ Part No. KI2805132C
5.73	Printouts of Product Description for LKQ Part No. KI2503201C
5.74	Printouts of Product Description for LKQ Part No. KI2803130C
5.75	Printouts of Product Description for LKQ Part No. KI2802107C
6.01	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D592,773
6.02	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D635,701
6.03	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D636,506
6.04	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D650,931
6.05	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D695,933
6.06	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D705,963
6.07	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D709,218
6.08	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D714,975
6.09	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D714,976
6.10	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D720,871
6.11	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D749,757
6.12	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D749,762
6.13	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D749,764
6.14	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D774,222
6.15	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D774,223
6.16	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D776,311
6.17	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D781,471
6.18	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D785,833
6.19	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D785,836
6.20	Domestic Industry (Technical Prong) Claim Chart for U.S. Design Patent No. D792,989

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Exhibit No.	Description
7.01C	Confidential Declaration of Jay Lee at Kia America, Inc.
7.02C	Confidential Declaration of Mark Sullivan at Kia Georgia, Inc.
7.03C	Confidential Declaration of Seokjoon Hong at Hyundai America Technical Center, Inc.
7.04C	Confidential Declaration of Samuel Sohn at Mobis Parts America LLC

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LIST OF PHYSICAL EXHIBITS²

Exhibit No.	Description
Phys. Ex. 1	TYC Brothers Industrial Co., Ltd.'s and LKQ Corporation's Accused Product (TYC Part No. 20-12733-00-9; LKQ Part No. KI2503152C) That Infringes U.S. Design Patent No. D650,931
Phys. Ex. 2	Kia's Domestic Industry Product (Kia Part No. 921022K540) That Practices U.S. Design Patent No. D650,931
Phys. Ex. 3	TYC Brothers Industrial Co., Ltd.'s and LKQ Corporation's Accused Product (TYC Part No. 11-6651-00-9; LKQ Part No. KI2801141C) That Infringes U.S. Design Patent No. D714,976
Phys. Ex. 4	Kia's Domestic Industry Product (Kia Part No. 92402B2010) That Practices U.S. Design Patent No. D714,976
Phys. Ex. 5	TYC Brothers Industrial Co., Ltd.'s and LKQ Corporation's Accused Product (TYC Part No. 20-9905-00-9; LKQ Part No. KI2503201C) That Infringes U.S. Design Patent No. D785,833
Phys. Ex. 6	Kia's Domestic Industry Product (Kia Part No. 92102B0701) That Practices U.S. Design Patent No. D785,833
Phys. Ex. 7	TYC Brothers Industrial Co., Ltd.'s and LKQ Corporation's Accused Product (TYC Part No. 17-5719-00-9; LKQ Part No. KI2803130C) That Infringes U.S. Design Patent No. D785,836
Phys. Ex. 8	Kia's Domestic Industry Product (Kia Part No. 92404B0600) That Practices U.S. Design Patent No. D785,836

² 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. D592,773
A.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D592,773
B	Certified Copy of File History of U.S. Design Patent No. D635,701
B.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D635,701
C	Certified Copy of File History of U.S. Design Patent No. D636,506
C.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D636,506
D	Certified Copy of File History of U.S. Design Patent No. D650,931
D.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D650,931
E	Certified Copy of File History of U.S. Design Patent No. D695,933
E.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D695,933
F	Certified Copy of File History of U.S. Design Patent No. D705,963
F.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D705,963
G	Certified Copy of File History of U.S. Design Patent No. D709,218
G.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D709,218
H	Certified Copy of File History of U.S. Design Patent No. D714,975
H.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D714,975
I	Certified Copy of File History of U.S. Design Patent No. D714,976
I.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D714,976
J	Certified Copy of File History of U.S. Design Patent No. D720,871
J.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D720,871
K	Certified Copy of File History of U.S. Design Patent No. D749,757
K.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D749,757
L	Certified Copy of File History of U.S. Design Patent No. D749,762
L.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D749,762
M	Certified Copy of File History of U.S. Design Patent No. D749,764
M.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D749,764
N	Certified Copy of File History of U.S. Design Patent No. D774,222
N.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D774,222

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Appendix No.	Description
O	Certified Copy of File History of U.S. Design Patent No. D774,223
O.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D774,223
P	Certified Copy of File History of U.S. Design Patent No. D776,311
P.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D776,311
Q	Certified Copy of File History of U.S. Design Patent No. D781,471
Q.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D781,471
R	Certified Copy of File History of U.S. Design Patent No. D785,833
R.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D785,833
S	Certified Copy of File History of U.S. Design Patent No. D785,836
S.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D785,836
T	Certified Copy of File History of U.S. Design Patent No. D792,989
T.1	Copies of References Cited in Prosecution History of U.S. Design Patent No. D792,989

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I. INTRODUCTION

1. Complainants Kia Corporation and Kia America, Inc. (collectively referred to where appropriate as “Kia” 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 Kia’s design patents listed in Table 1 below (“Asserted Patents”):

Table 1- Listing of Kia's Asserted Patents

Asserted Patent	Exhibit No.
U.S. Design Patent No. D592,773 (“the ’773 Patent)	1.01
U.S. Design Patent No. D635,701 (“the ’701 Patent)	1.02
U.S. Design Patent No. D636,506 (“the ’506 Patent)	1.03
U.S. Design Patent No. D650,931 (“the ’931 Patent)	1.04
U.S. Design Patent No. D695,933 (“the ’933 Patent)	1.05
U.S. Design Patent No. D705,963 (“the ’963 Patent)	1.06
U.S. Design Patent No. D709,218 (“the ’218 Patent)	1.07
U.S. Design Patent No. D714,975 (“the ’975 Patent)	1.08
U.S. Design Patent No. D714,976 (“the ’976 Patent)	1.09
U.S. Design Patent No. D720,871 (“the ’871 Patent)	1.10
U.S. Design Patent No. D749,757 (“the ’757 Patent)	1.11
U.S. Design Patent No. D749,762 (“the ’762 Patent)	1.12
U.S. Design Patent No. D749,764 (“the ’764 Patent)	1.13
U.S. Design Patent No. D774,222 (“the ’222 Patent)	1.14
U.S. Design Patent No. D774,223 (“the ’223 Patent)	1.15
U.S. Design Patent No. D776,311 (“the ’311 Patent)	1.16
U.S. Design Patent No. D781,471 (“the ’471 Patent)	1.17
U.S. Design Patent No. D785,833 (“the ’833 Patent)	1.18
U.S. Design Patent No. D785,836 (“the ’836 Patent)	1.19

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Asserted Patent	Exhibit No.
U.S. Design Patent No. D792,989 (“the ’989 Patent”)	1.20

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

3. Kia’s automobile designers spend years designing the individual look of their vehicles, including the distinctive headlamps and taillamps for those vehicles. Kia 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, Kia 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. Kia’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 Kia’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 Kia’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, in violation of Kia’s valuable intellectual property rights. Another principal infringer of Kia’s intellectual property rights is LKQ Corporation, who, together with its subsidiary Keystone Automotive Industries, Inc., have unlawfully imported into

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the United States, sold for importation into the United States, and/or sold within the United States after importation.

6. Kia 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 Kia's Asserted Patents.

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

II. THE COMPLAINANTS

A. Kia Corporation

9. Kia Corporation ("KC") is a Korean company, located in Seoul, Republic of Korea. KC manufactures or has others manufacture for KC and distributes Kia-branded automobiles and replacement parts through its authorized chain of distribution in the United States and around the world.

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

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B. Kia America, Inc.

11. Kia America, Inc. (“KAI”) is a corporation duly organized and existing under the laws of the State of California, with its principal place of business located in Irvine, California.

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

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

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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 other third party manufacturers and bear either the LKQ Corp.’s own brand name such as “Keystone” or the brand names of the manufacturers such as “TYC.”

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

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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 Kia-branded automobiles.”

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

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

Asserted Patent	Kia Model	Model Year	Part Description	Exemplary Kia’s Genuine Parts
The ’773 Patent	Forte	2009-13	Headlamp	921011M230 921021M230 921011M240 921021M240
The ’701 Patent	Optima	2011-13	Headlamp	921012T121 921012T131 921022T121 921022T131 921014C000 921024C000 921012T100 921012T110

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Asserted Patent	Kia Model	Model Year	Part Description	Exemplary Kia's Genuine Parts
The '506 Patent	Sportage	2013-16	Headlamp	921013W151 921023W151 921013W720 921023W720 921013W510 921023W510
The '931 Patent	Soul	2012-13	Headlamp	921022K540 921012K540
The '933 Patent	Forte	2014-16	Taillamp	92401A7030 92402A7030 92401A7000 92402A7000
The '963 Patent	Sorento	2014-15	Taillamp	924021U500 924011U500
The '218 Patent	Forte	2014-16	Headlamp	92102A7220 92101A7220 92101A7210 92101A7211
The '975 Patent	Soul	2014-19	Headlamp	92102B2270 92101B2270
The '976 Patent	Soul	2014-19	Taillamp	92402B2010 92401B2010
The '871 Patent	Optima	2014-15	Taillamp	924024C500 924014C500
The '757 Patent	Sedona	2015-18	Taillamp	92401A9020 92402A9020
The '762 Patent	Sorento	2016-18	Taillamp	92404C6000 92403C6000
The '764 Patent	Sorento	2016-18	Taillamp	92402C6000 92401C6000
The '222 Patent	Optima	2016-18	Headlamp	92102D5000 92101D5000
The '223 Patent	Optima	2016-20	Taillamp	92402D5000 92401D5000

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Asserted Patent	Kia Model	Model Year	Part Description	Exemplary Kia's Genuine Parts
The '311 Patent	Sportage	2017-19	Headlamp	92101D9301 92102D9301 92101D9311 92102D9311 92101D9140 92102D9140 92101D9141 92102D9141 92101D9130 92102D9130 92101D9131 92102D9131 92101D9110 92102D9110 92101D9111 92102D9111
The '471 Patent	Sportage	2017-19	Taillamp	92402D9020 92401D9020
The '833 Patent	Forte	2017-18	Headlamp	92101B0701 92102B0701
The '836 Patent	Forte	2017-18	Taillamp	92404B0600 92403B0600
The '989 Patent	Sedona	2015-18	Taillamp	92406A9000 92405A9000

V. THE ASSERTED PATENTS

A. The '773 Patent

19. The '773 Patent, entitled "Vehicle Head Lamp," issued to KC on May 19, 2009, from U.S. Design Patent Application No. 29/327,856, filed November 14, 2008. The '773 Patent lists Jaedo Han as an inventor. A certified copy of the '773 Patent is attached to the Complaint as Exhibit 1.01.

20. The '773 Patent remains in full force and effect and expires on May 19, 2023. KC is the owner of all right, title, and interest in and to the '773 Patent. A certified copy of the relevant assignment for the '773 Patent is attached to the Complaint as Exhibit 2.01.

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21. Together with this Complaint, a certified copy of the prosecution history of the '773 Patent is attached as Appendix A, with a copy of the references cited in the prosecution history attached as Appendix A.1.

22. The '773 Patent is directed to specific ornamental design features for a vehicle headlamp, as shown and described in the '773 Patent. The '773 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:

Fig. 1



Fig. 4



23. A list of foreign counterpart patents and/or applications to the '773 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '773 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2008-0030416	Issued	30-533977
CN	200830145582.8	Expired	ZL200830145582.8

B. The '701 Patent

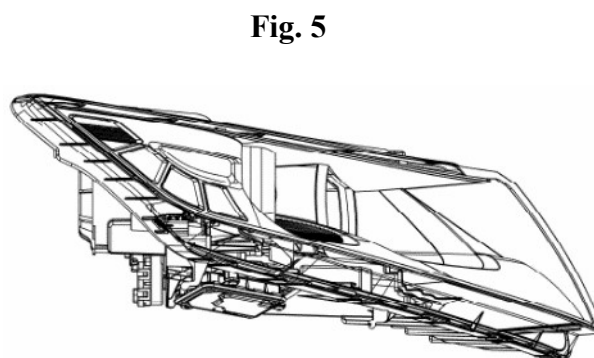
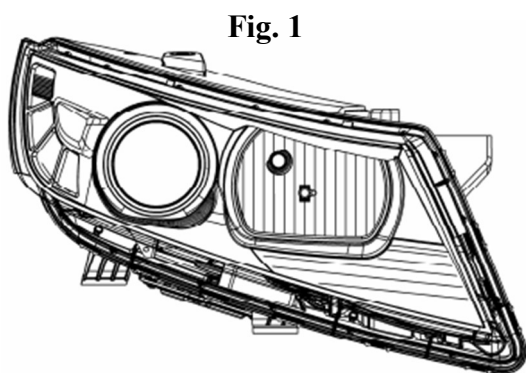
24. The '701 Patent, entitled "Headlamp for Automobiles," issued to KC on April 5, 2011, from U.S. Design Patent Application No. 29/368,574, filed August 25, 2010. The '701 Patent lists Hyung Uk Chang, Jae Kun Lee, and Se Jin Oh as inventors. A certified copy of the '701 Patent is attached to the Complaint as Exhibit 1.02.

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25. The '701 Patent remains in full force and effect and expires on April 5, 2025. KC is the owner of all right, title, and interest in and to the '701 Patent. A certified copy of the relevant assignment for the '701 Patent is attached to the Complaint as Exhibit 2.02.

26. Together with this Complaint, a certified copy of the prosecution history of the '701 Patent is attached as Appendix B, with a copy of the references cited in the prosecution history attached as Appendix B.1.

27. The '701 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '701 Patent. The '701 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 5, reproduced below, are exemplary:



28. A list of foreign counterpart patents and/or applications to the '701 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '701 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2010-0008608	Issued	30-0601489-0001

C. The '506 Patent

29. The '506 Patent, entitled "Head Lamp for Automobiles," issued to KC on April 19, 2011, from U.S. Design Patent Application No. 29/362,675, filed May 28, 2010. The '506 Patent lists Chi-Young Kim and Ji-Won Ha as inventors. A certified copy of the '506 Patent is attached to the Complaint as Exhibit 1.03.

30. The '506 Patent remains in full force and effect and expires on April 19, 2025. KC is the owner of all right, title, and interest in and to the '506 Patent. A certified copy of the relevant assignment for the '506 Patent is attached to the Complaint as Exhibit 2.03.

31. Together with this Complaint, a certified copy of the prosecution history of the '506 Patent is attached as Appendix C, with a copy of the references cited in the prosecution history attached as Appendix C.1.

32. The '506 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '506 Patent. The '506 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:

Fig. 1

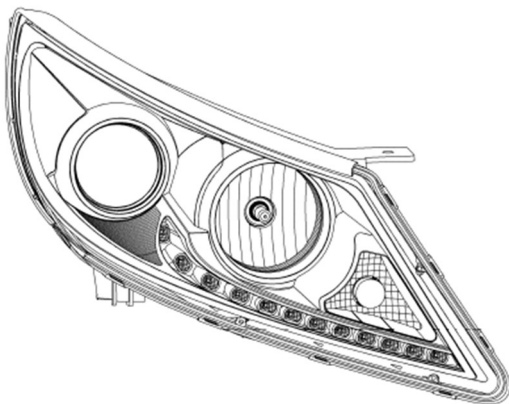
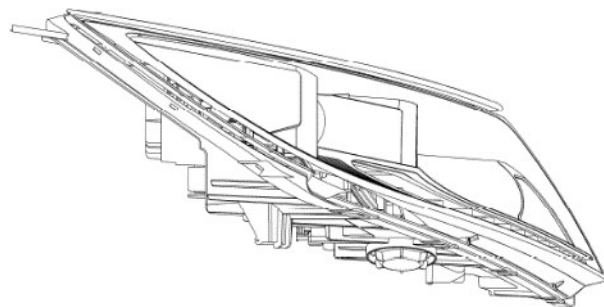


Fig. 4



33. A list of foreign counterpart patents and/or applications to the '506 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no

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other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '506 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2009-0053980	Issued	30-0587435
EP	001652595	Issued	001652595-0001
CN	201030002033.2	Expired	ZL201030002033.2

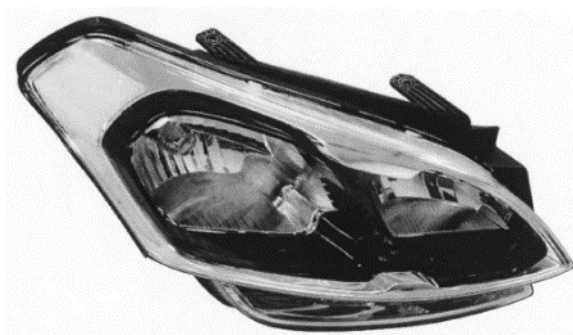
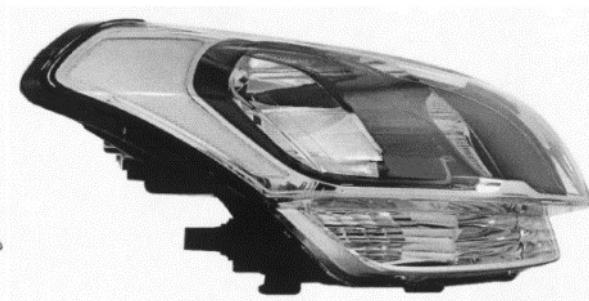
D. The '931 Patent

34. The '931 Patent, entitled "Head Lamp for Automobiles," issued to KC on December 20, 2011, from U.S. Design Patent Application No. 29/373,753, filed May 18, 2011. The '931 Patent lists Gwon-Hak Lee and Byung-Woo Kim as inventors. A certified copy of the '931 Patent is attached to the Complaint as Exhibit 1.04.

35. The '931 Patent remains in full force and effect and expires on December 20, 2025. KC is the owner of all right, title, and interest in and to the '931 Patent. A certified copy of the relevant assignment for the '931 Patent is attached to the Complaint as Exhibit 2.04.

36. Together with this Complaint, a certified copy of the prosecution history of the '931 Patent is attached as Appendix D, with a copy of the references cited in the prosecution history attached as Appendix D.1.

37. The '931 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '931 Patent. The '931 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 '931 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '931 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2011-0001811	Issued	30-0638732-0001
CN	201130183425.8	Expired	ZL201130183425.8

E. The '933 Patent

39. The '933 Patent, entitled "Rear Combination Lamp for an Automobile," issued to KC on December 17, 2013, from U.S. Design Patent Application No. 29/421,882, filed October 9, 2012. The '933 Patent lists Woo Hyun Kim and Hwan Wook Baek as inventors. A certified copy of the '933 Patent is attached to the Complaint as Exhibit 1.05.

40. The '933 Patent remains in full force and effect and expires on December 17, 2027. KC is the owner of all right, title, and interest in and to the '933 Patent. A certified copy of the relevant assignment for the '933 Patent is attached to the Complaint as Exhibit 2.05.

41. Together with this Complaint, a certified copy of the prosecution history of the '933 Patent is attached as Appendix E, with a copy of the references cited in the prosecution history attached as Appendix E.1.

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42. The '933 Patent is directed to specific ornamental design features for a rear combination lamp for an automobile, as shown and described in the '933 Patent. The '933 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

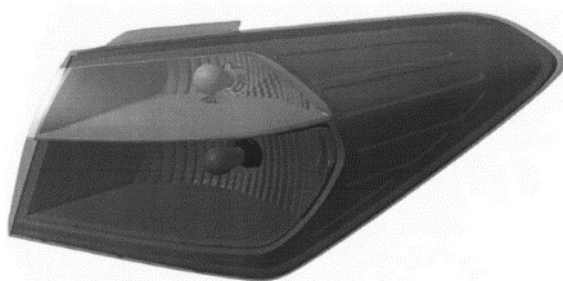


Fig. 2



43. A list of foreign counterpart patents and/or applications to the '933 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '933 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2012-0018172	Issued	30-0696316
CN	201230423082.2	Issued	ZL201230423082.2

F. The '963 Patent

44. The '963 Patent, entitled "Rear Combination Lamp for an Automobile," issued to KC on May 27, 2014, from U.S. Design Patent Application No. 29/421,800, filed September 25, 2012. The '963 Patent lists Jung Woo Sa and Sung Wook Kim as inventors. A certified copy of the '963 Patent is attached to the Complaint as Exhibit 1.06.

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45. The '963 Patent remains in full force and effect and expires on May 27, 2028. KC is the owner of all right, title, and interest in and to the '963 Patent. A certified copy of the relevant assignment for the '963 Patent is attached to the Complaint as Exhibit 2.06.

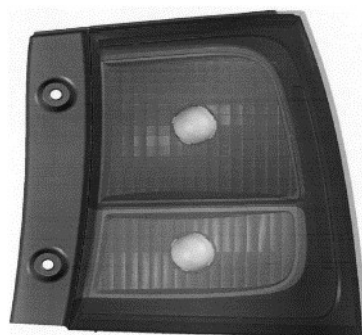
46. Together with this Complaint, a certified copy of the prosecution history of the '963 Patent is attached as Appendix F, with a copy of the references cited in the prosecution history attached as Appendix F.1.

47. The '963 Patent is directed to specific ornamental design features for a rear combination lamp for an automobile, as shown and described in the '963 Patent. The '963 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1



Fig. 2



48. A list of foreign counterpart patents and/or applications to the '963 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '963 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2012-0026666	Issued	30-0700030
EP	002065631	Issued	002065631-0001
CN	201230285269.0	Issued	ZL201230285269.0

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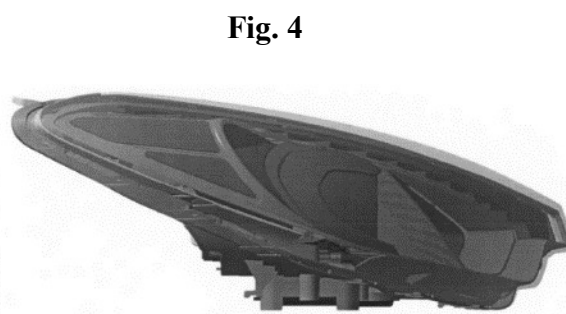
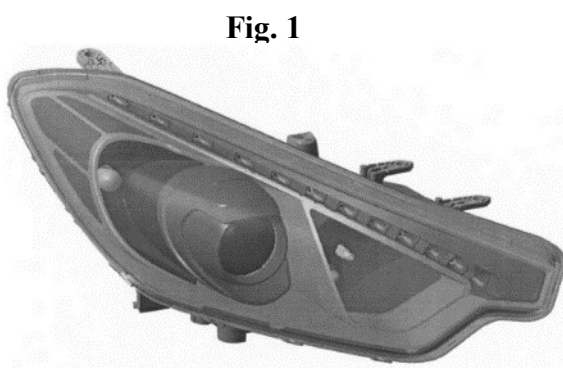
G. The '218 Patent

49. The '218 Patent, entitled “Headlamp for an Automobile,” issued to KC on July 15, 2014, from U.S. Design Patent Application No. 29/421,880, filed October 9, 2012. The '218 Patent lists Woo Hyun Kim and Hwan Wook Baek as inventors. A certified copy of the '218 Patent is attached to the Complaint as Exhibit 1.07.

50. The '218 Patent remains in full force and effect and expires on July 15, 2028. KC is the owner of all right, title, and interest in and to the '218 Patent. A certified copy of the relevant assignment for the '218 Patent is attached to the Complaint as Exhibit 2.07.

51. Together with this Complaint, a certified copy of the prosecution history of the '218 Patent is attached as Appendix G, with a copy of the references cited in the prosecution history attached as Appendix G.1.

52. The '218 Patent is directed to specific ornamental design features for a headlamp for an automobile, as shown and described in the '218 Patent. The '218 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:



53. A list of foreign counterpart patents and/or applications to the '218 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no

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other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '218 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2012-0018125	Issued	30-0696259

H. The '975 Patent

54. The '975 Patent, entitled "Head Lamp for Automobiles," issued to KC on October 7, 2014, from U.S. Design Patent Application No. 29/442,887, filed June 7, 2013. The '975 Patent lists Gwon-Hak Lee, Mun-Hyo Yoon, Young-Min Kim, and Yun-Seok Oh as inventors. A certified copy of the '975 Patent is attached to the Complaint as Exhibit 1.08.

55. The '975 Patent remains in full force and effect and expires on October 7, 2028. KC is the owner of all right, title, and interest in and to the '975 Patent. A certified copy of the relevant assignment for the '975 Patent is attached to the Complaint as Exhibit 2.08.

56. Together with this Complaint, a certified copy of the prosecution history of the '975 Patent is attached as Appendix H, with a copy of the references cited in the prosecution history attached as Appendix H.1.

57. The '975 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '975 Patent. The '975 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:

Fig. 1

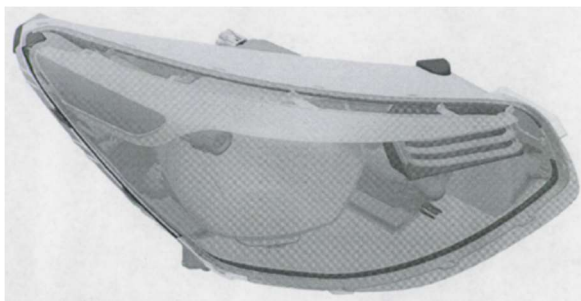
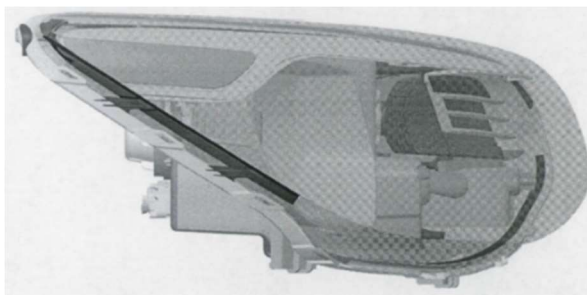


Fig. 4



58. A list of foreign counterpart patents and/or applications to the '975 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '975 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2013-0008831	Issued	30-0722178
EP	002221911	Issued	002221911-0001
CN	201330118566.0	Issued	ZL201330118566.0

I. The '976 Patent

59. The '976 Patent, entitled "Rear Combination Lamp for Automobiles," issued to KC on October 7, 2014, from U.S. Design Patent Application No. 29/442,889, filed June 7, 2013. The '976 Patent lists Gwon-Hak Lee, Mun-Hyo Yoon, Young-Min Kim and Yun-Seok Oh as inventors. A certified copy of the '976 Patent is attached to the Complaint as Exhibit 1.09.

60. The '976 Patent remains in full force and effect and expires on October 7, 2028. KC is the owner of all right, title, and interest in and to the '976 Patent. A certified copy of the relevant assignment for the '976 Patent is attached to the Complaint as Exhibit 2.09.

61. Together with this Complaint, a certified copy of the prosecution history of the '976 Patent is attached as Appendix I, with a copy of the references cited in the prosecution history attached as Appendix I.1.

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62. The '976 Patent is directed to specific ornamental design features for a rear combination lamp for automobiles, as shown and described in the '976 Patent. The '976 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 4, reproduced below, are exemplary:

Fig. 1

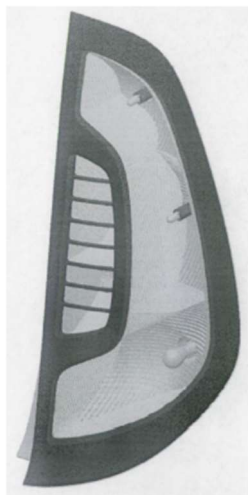
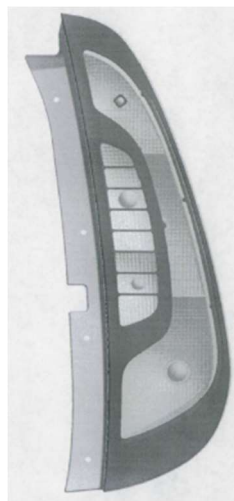


Fig. 2



63. A list of foreign counterpart patents and/or applications to the '976 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '976 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2013-0008825	Issued	30-0722172-0001
EP	002221713	Issued	002221713-0001
CN	201330118543.X	Issued	ZL201330118543.X

J. The '871 Patent

64. The '871 Patent, entitled "Rear Combination Lamp for an Automobile," issued to KC on January 6, 2015, from U.S. Design Patent Application No. 29/463,291, filed October 1,

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2013. The '871 Patent lists Jung-wook Lim and Hwan-Wook Baek as inventors. A certified copy of the '871 Patent is attached to the Complaint as Exhibit 1.10.

65. The '871 Patent remains in full force and effect and expires on January 6, 2029. KC is the owner of all right, title, and interest in and to the '871 Patent. A certified copy of the relevant assignment for the '871 Patent is attached to the Complaint as Exhibit 2.10.

66. Together with this Complaint, a certified copy of the prosecution history of the '871 Patent is attached as Appendix J, with a copy of the references cited in the prosecution history attached as Appendix J.1.

67. The '871 Patent is directed to specific ornamental design features for a rear combination lamp for automobiles, as shown and described in the '871 Patent. The '871 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

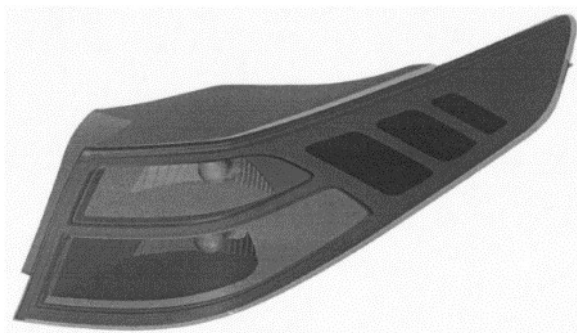
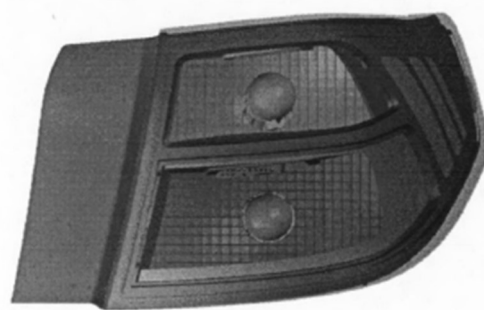


Fig. 2



68. A list of foreign counterpart patents and/or applications to the '871 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '871 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2013-0030108	Issued	30-0742902

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EP	002267633	Issued	002267633-0001
CN	201330303573.	Issued	ZL201330303573.8

K. The '757 Patent

69. The '757 Patent, entitled "Rear Lamp for an Automobile," issued to KC on February 16, 2016, from U.S. Design Patent Application No. 29/474,302, filed August 5, 2014. The '757 Patent lists Jae Do Han and Seo Hee Ahn as inventors. A certified copy of the '757 Patent is attached to the Complaint as Exhibit 1.11.

70. The '757 Patent remains in full force and effect and expires on February 16, 2030. KC is the owner of all right, title, and interest in and to the '757 Patent. A certified copy of the relevant assignment for the '757 Patent is attached to the Complaint as Exhibit 2.11.

71. Together with this Complaint, a certified copy of the prosecution history of the '757 Patent is attached as Appendix K, with a copy of the references cited in the prosecution history attached as Appendix K.1.

72. The '757 Patent is directed to specific ornamental design features for a rear lamp for an automobile, as shown and described in the '757 Patent. The '757 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 5, reproduced below, are exemplary:

Fig. 1



Fig. 5



PUBLIC VERSION

73. A list of foreign counterpart patents and/or applications to the '757 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '757 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201430166864.1	Issued	ZL201430166864.1
KR	30-2014-0015307	Issued	30-0774281

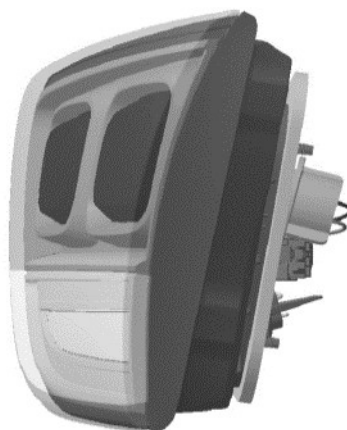
L. The '762 Patent

74. The '762 Patent, entitled "Rear Combination Lamp for an Automobile," issued to KC on February 16, 2016, from U.S. Design Patent Application No. 29/512,177, filed December 17, 2014. The '762 Patent lists Jung Woo Sa and Yun Seok Oh as inventors. A certified copy of the '762 Patent is attached to the Complaint as Exhibit 1.12.

75. The '762 Patent remains in full force and effect and expires on February 16, 2030. KC is the owner of all right, title, and interest in and to the '762 Patent. A certified copy of the relevant assignment for the '762 Patent is attached to the Complaint as Exhibit 2.12.

76. Together with this Complaint, a certified copy of the prosecution history of the '762 Patent is attached as Appendix L, with a copy of the references cited in the prosecution history attached as Appendix L.1.

77. The '762 Patent is directed to specific ornamental design features for a rear combination lamp for an automobile, as shown and described in the '762 Patent. The '762 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 5, reproduced below, are exemplary:

Fig. 1**Fig. 5**

78. A list of foreign counterpart patents and/or applications to the '762 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '762 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201430364076.3	Issued	ZL201430364076.3
EP	002547315	Issued	002547315-0001
KR	30-2014-0032835	Issued	30-0787173

M. The '764 Patent

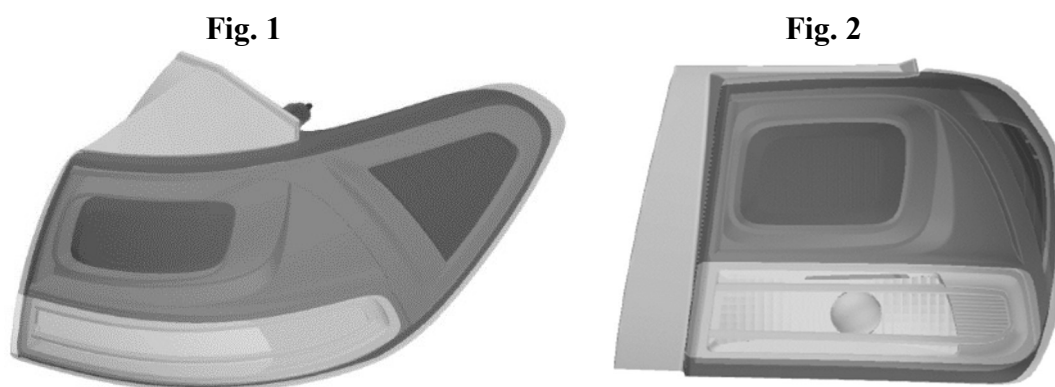
79. The '764 Patent, entitled "Rear Combination Lamp for an Automobile," issued to KC on February 16, 2016, from U.S. Design Patent Application No. 29/512,185, filed December 17, 2014. The '764 Patent lists Jung Woo Sa and Yun Seok Oh as inventors. A certified copy of the '764 Patent is attached to the Complaint as Exhibit 1.13.

80. The '764 Patent remains in full force and effect and expires on February 16, 2030. KC is the owner of all right, title, and interest in and to the '764 Patent. A certified copy of the relevant assignment for the '764 Patent is attached to the Complaint as Exhibit 2.13.

PUBLIC VERSION

81. Together with this Complaint, a certified copy of the prosecution history of the '764 Patent is attached as Appendix M, with a copy of the references cited in the prosecution history attached as Appendix M.1.

82. The '764 Patent is directed to specific ornamental design features for a rear combination lamp for an automobile, as shown and described in the '764 Patent. The '764 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:



83. A list of foreign counterpart patents and/or applications to the '764 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '764 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201430364204.4	Issued	ZL201430364204.4
EP	002547208	Issued	002547208-0001
KR	30-2014-0032830	Issued	30-0787172

N. The '222 Patent

84. The '222 Patent, entitled "Head Lamp for Automobiles," issued to KC on December 13, 2016, from U.S. Design Patent Application No. 29/534,662, filed July 30, 2015.

PUBLIC VERSION

The '222 Patent lists Jung-wook Lim and Soo-Woon Jeon as inventors. A certified copy of the '222 Patent is attached to the Complaint as Exhibit 1.14.

85. The '222 Patent remains in full force and effect and expires on December 13, 2031. KC is the owner of all right, title, and interest in and to the '222 Patent. A certified copy of the relevant assignment for the '222 Patent is attached to the Complaint as Exhibit 2.14.

86. Together with this Complaint, a certified copy of the prosecution history of the '222 Patent is attached as Appendix N, with a copy of the references cited in the prosecution history attached as Appendix N.1.

87. The '222 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '222 Patent. The '222 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

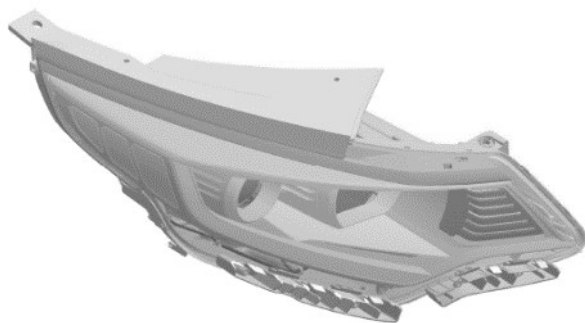
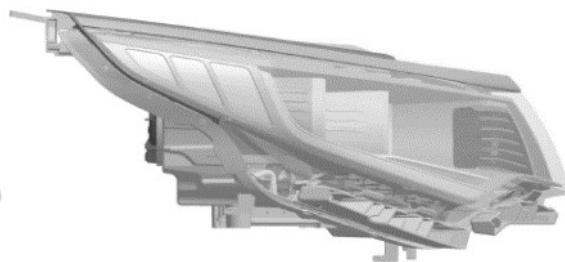


Fig. 2



88. A list of foreign counterpart patents and/or applications to the '222 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '222 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201530104640.2	Issued	ZL201530104640.2

PUBLIC VERSION

EP		Issued	DM/088481
KR	30-2015-0008353	Issued	30-0809169

O. The '223 Patent

89. The '223 Patent, entitled “Rear Combination Lamp for Automobiles,” issued to KC on December 13, 2016, from U.S. Design Patent Application No. 29/534,676, filed July 30, 2015. The '223 Patent lists Jung-wook Lim and Soo-Woon Jeon as inventors. A certified copy of the '223 Patent is attached to the Complaint as Exhibit 1.15.

90. The '223 Patent remains in full force and effect and expires on December 13, 2031. KC is the owner of all right, title, and interest in and to the '223 Patent. A certified copy of the relevant assignment for the '223 Patent is attached to the Complaint as Exhibit 2.15.

91. Together with this Complaint, a certified copy of the prosecution history of the '223 Patent is attached as Appendix O, with a copy of the references cited in the prosecution history attached as Appendix O.1.

92. The '223 Patent is directed to specific ornamental design features for a rear combination lamp for automobiles, as shown and described in the '223 Patent. The '223 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

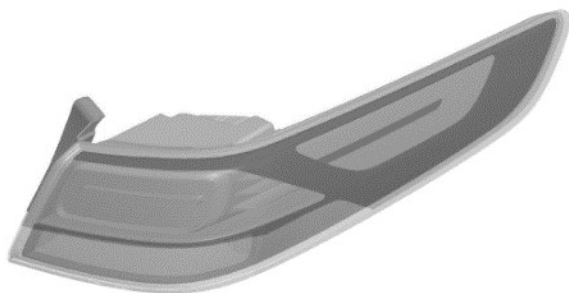


Fig. 2



PUBLIC VERSION

93. A list of foreign counterpart patents and/or applications to the '223 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '223 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201530104570.0	Issued	ZL201530104570.0
EP		Issued	DM/088486
KR	30-2015-0008351	Issued	30-0811190

P. The '311 Patent

94. The '311 Patent, entitled "Head Lamp for Automobile," issued to KC on January 10, 2017, from U.S. Design Patent Application No. 29/547,396, filed December 3, 2015.

The '311 Patent lists Jae Do Han and Mun Hyo Yoon as inventors. A certified copy of the '311 Patent is attached to the Complaint as Exhibit 1.16.

95. The '311 Patent remains in full force and effect and expires on January 10, 2032. KC is the owner of all right, title, and interest in and to the '311 Patent. A certified copy of the relevant assignment for the '311 Patent is attached to the Complaint as Exhibit 2.16.

96. Together with this Complaint, a certified copy of the prosecution history of the '311 Patent is attached as Appendix P, with a copy of the references cited in the prosecution history attached as Appendix P.1.

97. The '311 Patent is directed to specific ornamental design features for a headlamp for automobiles, as shown and described in the '311 Patent. The '311 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 '311 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '311 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201530434897.4	Issued	ZL201530434897.4
EP		Issued	DM/089474
KR	30-2015-0035962	Issued	30-0833715

Q. The '471 Patent

99. The '471 Patent, entitled "Rear Combination Lamp for Automobile," issued to KC on March 14, 2017, from U.S. Design Patent Application No. 29/547,411, filed December 3, 2015. The '471 Patent lists Jae Do Han and Mun Hyo Yoon as inventors. A certified copy of the '471 Patent is attached to the Complaint as Exhibit 1.17.

100. The '471 Patent remains in full force and effect and expires on March 14, 2032. KC is the owner of all right, title, and interest in and to the '471 Patent. A certified copy of the relevant assignment for the '471 Patent is attached to the Complaint as Exhibit 2.17.

PUBLIC VERSION

101. Together with this Complaint, a certified copy of the prosecution history of the '471 Patent is attached as Appendix Q, with a copy of the references cited in the prosecution history attached as Appendix Q.1.

102. The '471 Patent is directed to specific ornamental design features for a rear combination lamp for automobile, as shown and described in the '471 Patent. The '471 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

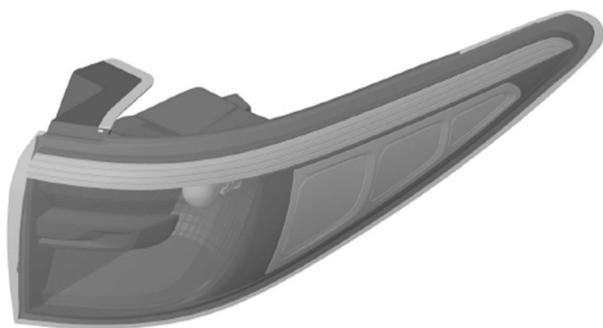
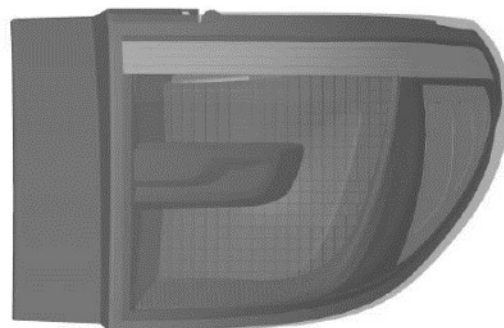


Fig. 2



103. A list of foreign counterpart patents and/or applications to the '471 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '471 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201530435205.8	Issued	ZL201530435205.8
EP		Issued	DM/089440
KR	30-2015-0035883	Issued	30-0833712

R. The '833 Patent

104. The '833 Patent, entitled "Head Lamp for an Automobile," issued to KC on May 2, 2017, from U.S. Design Patent Application No. 29/557,653, filed March 10, 2016. The '833

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Patent lists Soon Il Lee and Ju Young Kim as inventors. A certified copy of the '833 Patent is attached to the Complaint as Exhibit 1.18.

105. The '833 Patent remains in full force and effect and expires on May 2, 2032. KC is the owner of all right, title, and interest in and to the '833 Patent. A certified copy of the relevant assignment for the '833 Patent is attached to the Complaint as Exhibit 2.18.

106. Together with this Complaint, a certified copy of the prosecution history of the '833 Patent is attached as Appendix R, with a copy of the references cited in the prosecution history attached as Appendix R.1.

107. The '833 Patent is directed to specific ornamental design features for a headlamp for an automobile, as shown and described in the '833 Patent. The '833 Patent has seven figures, showing the ornamental design features from various viewpoints. Figures 1 and 2, reproduced below, are exemplary:

Fig. 1

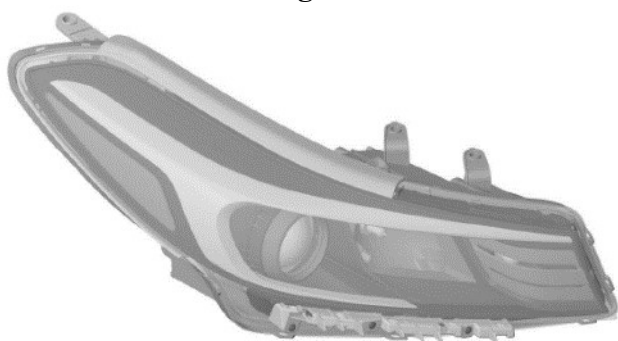
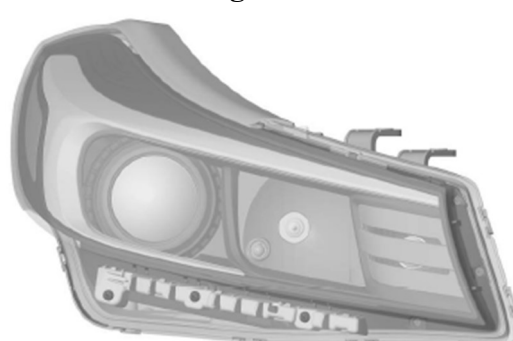


Fig. 2



108. A list of foreign counterpart patents and/or applications to the '833 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '833 Patent.

Country	Application No.	Status	Patent/Publication No.
KR	30-2015-0048299	Issued	30-0838584

S. The '836 Patent

109. The '836 Patent, entitled “Rear Combination Lamp for an Automobile,” issued to KC on May 2, 2017, from U.S. Design Patent Application No. 29/557,676, filed March 10, 2016. The '836 Patent lists Soon Il Lee and Ju Young Kim as inventors. A certified copy of the '836 Patent is attached to the Complaint as Exhibit 1.19.

110. The '836 Patent remains in full force and effect and expires on May 2, 2032. KC 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 2.19.

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

112. The '836 Patent is directed to specific ornamental design features for a rear combination lamp for an automobile, 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

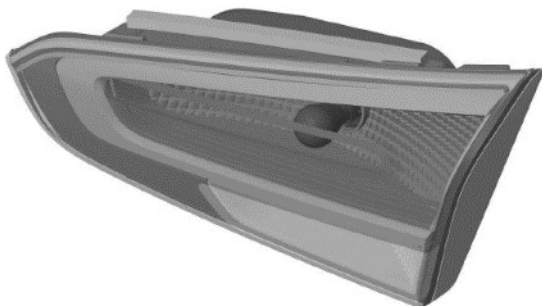
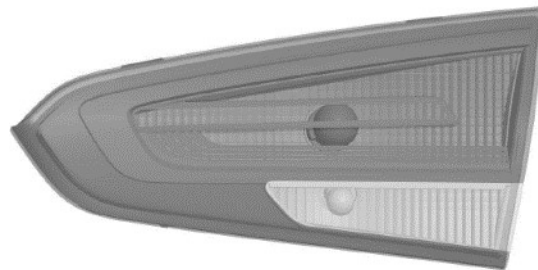


Fig. 2



113. A list of foreign counterpart patents and/or applications to the '836 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no

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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	30-2015-0047070	Issued	30-0838576

T. The '989 Patent

114. The '989 Patent, entitled "Rear Combination Lamp for Automobile," issued to KC on July 25, 2017, from U.S. Design Patent Application No. 29/474,301, filed August 5, 2014. The '989 Patent lists Jae Do Han and Seo Hee Ahn as inventors. A certified copy of the '989 Patent is attached to the Complaint as Exhibit 1.20.

115. The '989 Patent remains in full force and effect and expires on July 25, 2031. KC is the owner of all right, title, and interest in and to the '989 Patent. A certified copy of the relevant assignment for the '989 Patent is attached to the Complaint as Exhibit 2.20.

116. Together with this Complaint, a certified copy of the prosecution history of the '989 Patent is attached as Appendix T, with a copy of the references cited in the prosecution history attached as Appendix T.1.

117. The '989 Patent is directed to specific ornamental design features for a rear combination lamp for automobile, as shown and described in the '989 Patent. The '989 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 '989 Patent is provided in a chart below. To the best of Kia's knowledge, information, and belief, there are no other foreign patents or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '989 Patent.

Country	Application No.	Status	Patent/Publication No.
CN	201430166738.6	Issued	ZL201430166738.6
KR	30-2014-0014855	Issued	30-0774275

VI. UNLAWFUL AND UNFAIR ACTS OF THE PROPOSED RESPONDENTS

119. 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.

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120. 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 Kia'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 Kia'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 Kia'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.

121. 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 '773 Patent

122. 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 '773 Patent. On

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information and belief, the LKQ Respondents have the TYC Respondents made certain knockoff replacement headlamps that infringe the '773 Patent and, thereafter, import into the United States, sell for importation, and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured or have made by the TYC Respondents.

123. A claim chart that applies the '773 Patent to the Respondents' representative infringing product (TYC Part No. 20-9117-00-9; LKQ Part No. KI2503141C) is attached as Exhibit 4.01. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '773 Patent.

Fig. 1 of the '773 Patent



Infringing Product



124. The claim chart illustrates that the Respondents' representative infringing product infringes the '773 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '773 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 '701 Patent

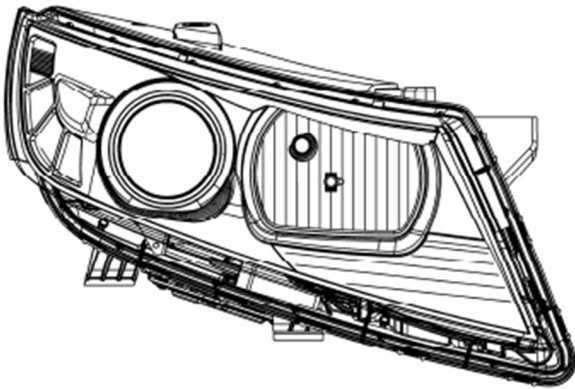
125. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '701 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation,

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and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured or have made by the TYC Respondents.

126. A claim chart that applies the '701 Patent to the Respondents' representative infringing product (TYC Part No. 20-9306-00-9; LKQ Part No. KI2502157C) is attached as Exhibit 4.02. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '701 Patent.

Fig. 1 of the '701 Patent



Infringing Product



127. The claim chart illustrates that the Respondents' representative infringing product infringes the '701 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '701 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 '506 Patent

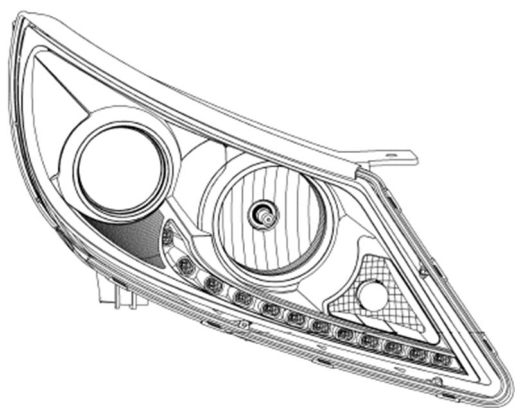
128. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '506 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation,

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and/or sell in the United States after importation knockoff replacement headlamps manufactured by Depo Auto Parts Industrial Co., Ltd. of Taiwan (“Depo”) or the TYC Respondents.

129. Claim charts that applies the ’506 Patent to the TYC Respondents’ representative infringing product (TYC Part No. 20-12559-00) and the LKQ Respondents’ representative infringing product (LKQ Part No. KI2502184C; Depo Part No. 323-1134L-ACD2) are attached as Exhibit 4.03. For example, photographs of the Respondents’ representative infringing products are reproduced below with Fig. 1 of the ’506 Patent.

Fig. 1 of the ’506 Patent



**Infringing Products
(TYC)**



(LKQ)



130. The claim charts illustrate that the Respondents’ representative infringing products infringe the ’506 Patent because the designs of the Respondents’ representative products are substantially identical to the design embodied in the ’506 Patent, and the

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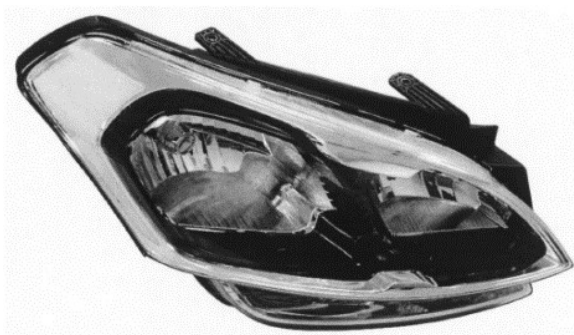
resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing products.

D. Respondents' Infringement of the '931 Patent

131. 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 '931 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.

132. A claim chart that applies the '931 Patent to the Respondents' representative infringing product (TYC Part No. 20-12733-00-9; LKQ Part No. KI2503152C) is attached as Exhibit 4.04. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '931 Patent.

Fig. 1 of the '931 Patent



Infringing Product



133. The claim chart illustrates that the Respondents' representative infringing product infringes the '931 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '931 Patent, and the resemblance is such as

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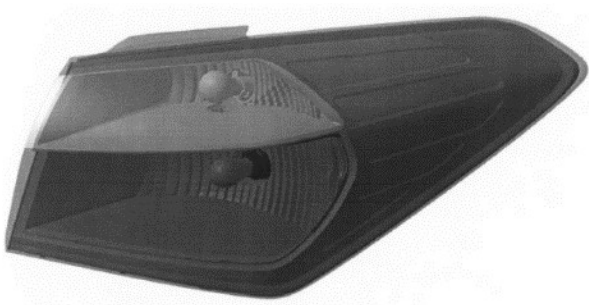
to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

E. Respondents' Infringement of the '933 Patent

134. 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 '933 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.

135. A claim chart that applies the '933 Patent to the Respondents' representative infringing product (TYC Part No. 11-6604-00-9; LKQ Part No. KI2804112C) is attached as Exhibit 4.05. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '933 Patent.

Fig. 1 of the '933 Patent



Infringing Product



136. The claim chart illustrates that the Respondents' representative infringing product infringes the '933 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '933 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.

F. Respondents' Infringement of the '963 Patent

137. 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 '963 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.

138. A claim chart that applies the '963 Patent to the Respondents' representative infringing product (TYC Part No. 11-6613-00-9; LKQ Part No. KI2805111C) is attached as Exhibit 4.06. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '963 Patent.

Fig. 1 of the '963 Patent



Infringing Product



139. The claim chart illustrates that the Respondents' representative infringing product infringes the '963 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '963 Patent, and the resemblance is such as

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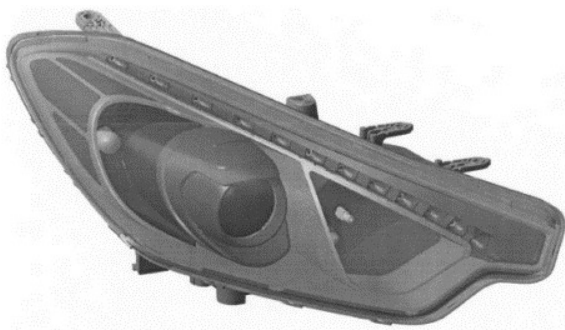
to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

G. Respondents' Infringement of the '218 Patent

140. 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 '218 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.

141. A claim chart that applies the '218 Patent to the Respondents' representative infringing product (TYC Part No. 20-9460-90-9; LKQ Part No. KI2502171C) is attached as Exhibit 4.07. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '218 Patent.

Fig. 1 of the '218 Patent



Infringing Product



142. The claim chart illustrates that the Respondents' representative infringing product infringes the '218 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '218 Patent, and the resemblance is such as

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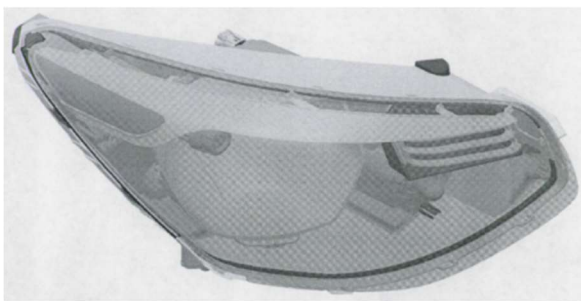
to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

H. Respondents' Infringement of the '975 Patent

143. 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 '975 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.

144. A claim chart that applies the '975 Patent to the Respondents' representative infringing product (TYC Part No. 20-9516-00-9; LKQ Part No. KI2502167C) is attached as Exhibit 4.08. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '975 Patent.

Fig. 1 of the '975 Patent



Infringing Product



145. The claim chart illustrates that the Respondents' representative infringing product infringes the '975 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '975 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

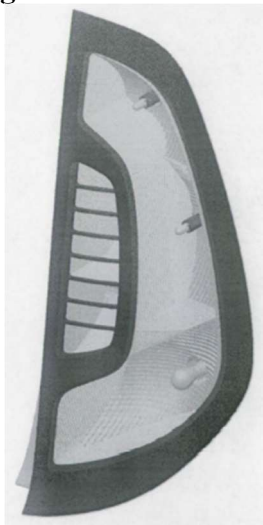
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I. Respondents' Infringement of the '976 Patent

146. 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 '976 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.

147. A claim chart that applies the '976 Patent to the Respondents' representative infringing product (TYC Part No. 11-6651-00-9; LKQ Part No. KI2801141C) is attached as Exhibit 4.09. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '976 Patent.

Fig. 1 of the '976 Patent



Infringing Product



148. The claim chart illustrates that the Respondents' representative infringing product infringes the '976 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '976 Patent, and the resemblance is such as

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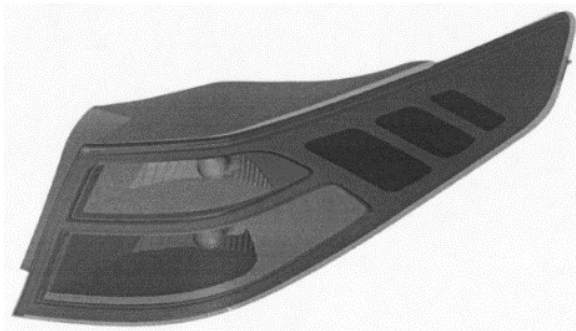
to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

J. Respondents' Infringement of the '871 Patent

149. 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 '871 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.

150. A claim chart that applies the '871 Patent to the Respondents' representative infringing product (TYC Part No. 11-6726-00-9; LKQ Part No. KI2804114C) is attached as Exhibit 4.10. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '871 Patent.

Fig. 1 of the '871 Patent



Infringing Product



151. The claim chart illustrates that the Respondents' representative infringing product infringes the '871 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '871 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.

K. Respondents' Infringement of the '757 Patent

152. 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 '757 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.

153. A claim chart that applies the '757 Patent to the Respondents' representative infringing product (TYC Part No. 11-6763-00-9; LKQ Part No. KI2805117C) is attached as Exhibit 4.11. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '757 Patent.

Fig. 1 of the '757 Patent



Infringing Product



154. The claim chart illustrates that the Respondents' representative infringing product infringes the '757 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '757 Patent, and the resemblance is such as

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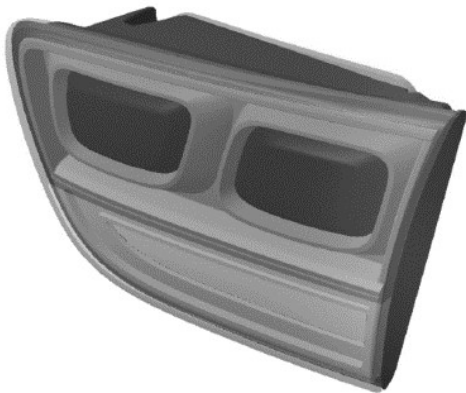
to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

L. Respondents' Infringement of the '762 Patent

155. 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 '762 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.

156. A claim chart that applies the '762 Patent to the Respondents' representative infringing product (TYC Part No. 17-5564-00-9; LKQ Part No. KI2802108C) is attached as Exhibit 4.12. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '762 Patent.

Fig. 1 of the '762 Patent



Infringing Product



157. The claim chart illustrates that the Respondents' representative infringing product infringes the '762 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '762 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.

M. Respondents' Infringement of the '764 Patent

158. 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 '764 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.

159. A claim chart that applies the '764 Patent to the Respondents' representative infringing product (TYC Part No. 11-6780-00-9; LKQ Part No. KI2804119C) is attached as Exhibit 4.13. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '764 Patent.

Fig. 1 of the '764 Patent



Infringing Product



160. The claim chart illustrates that the Respondents' representative infringing product infringes the '764 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '764 Patent, and the resemblance is such as

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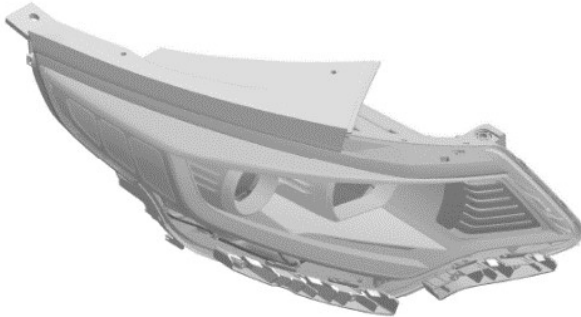
to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

N. Respondents' Infringement of the '222 Patent

161. 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 '222 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 knockoff replacement headlamps manufactured by Depo or the TYC Respondents.

162. Claim charts that apply the '222 Patent to the Respondents' representative infringing product (TYC Part No. 20-9891-00-9) and the LKQ Respondents' representative infringing product (LKQ Part No. KI2503196C; Depo Part No. 323-1152R-AC2) are attached as Exhibit 4.14. For example, photographs of the Respondents' representative infringing products are reproduced below with Fig. 1 of the '222 Patent.

Fig. 1 of the '222 Patent



**Infringing Product
(TYC)**



(LKQ)



163. The claim charts illustrate that the Respondents' representative infringing products infringe the '222 Patent because the designs of the Respondents' representative products are substantially identical to the design embodied in the '222 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing products.

O. Respondents' Infringement of the '223 Patent

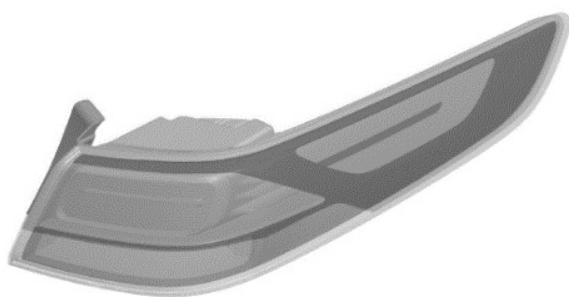
164. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement taillamps that infringe the '223 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation, and/or sell in the United States after importation knockoff replacement taillamps manufactured by Depo or the TYC Respondents.

165. Claim charts that apply the '223 Patent to the TYC Respondents' representative infringing product (TYC Part No. 11-6956-00-9) and the LKQ Respondents' representative

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infringing product (LKQ Part No. KI2805130C; Depo Part No. 323-1957R-AC) are attached as Exhibit 4.15. For example, photographs of the Respondents' representative infringing products are reproduced below with Fig. 1 of the '223 Patent.

Fig. 1 of the '223 Patent



**Infringing Product
(TYC)**



(LKQ)



166. The claim charts illustrate that the Respondents' representative infringing products infringe the '223 Patent because the designs of the Respondents' representative products are substantially identical to the design embodied in the '223 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing products.

P. Respondents' Infringement of the '311 Patent

167. 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 '311 Patent. On information and belief, the LKQ Respondents import into the United States, sell for importation,

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and/or sell in the United States after importation at least those knockoff replacement headlamps manufactured by the TYC Respondents.

168. A claim chart that applies the '311 Patent to the Respondents' representative infringing product (TYC Part No. 20-9822-00-9; LKQ Part No. KI2502198C) is attached as Exhibit 4.16. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '311 Patent.

Fig. 1 of the '311 Patent



Infringing Product



169. The claim chart illustrates that the Respondents' representative infringing product infringes the '311 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '311 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

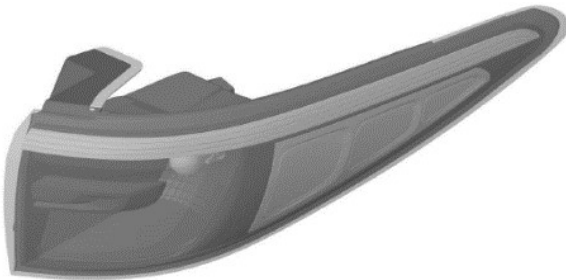
Q. Respondents' Infringement of the '471 Patent

170. 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 '471 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.

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171. A claim chart that applies the '471 Patent to the Respondents' representative infringing product (TYC Part No. 11-6911-00-9; LKQ Part No. KI2805132C) is attached as Exhibit 4.17. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '471 Patent.

Fig. 1 of the '471 Patent



Infringing Product



172. The claim chart illustrates that the Respondents' representative infringing product infringes the '471 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '471 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

R. Respondents' Infringement of the '833 Patent

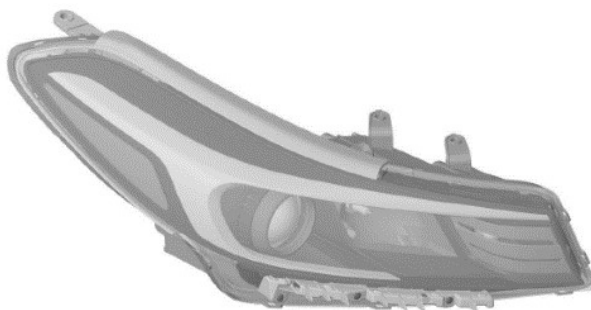
173. On information and belief, the TYC Respondents make or have made in Taiwan and import into the United States, sell for importation, and/or sell in the United States after importation certain knockoff replacement headlamps that infringe the '833 Patent. On information and belief, the LKQ Respondents 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.

174. A claim chart that applies the '833 Patent to the Respondents' representative infringing product (TYC Part No. 20-9905-00-9; LKQ Part No. KI2503201C) is attached as

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Exhibit 4.18. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '833 Patent.

Fig. 1 of the '833 Patent



Infringing Product



175. The claim chart illustrates that the Respondents' representative infringing product infringes the '833 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '833 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

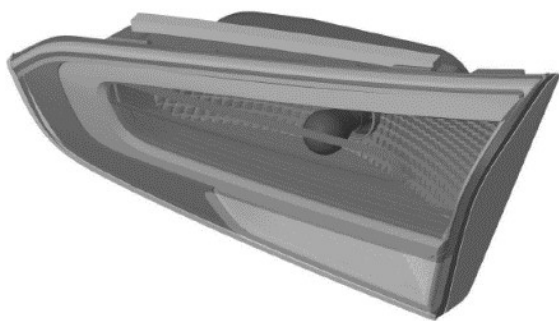
S. Respondents' Infringement of the '836 Patent

176. 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.

177. A claim chart that applies the '836 Patent to the Respondents' representative infringing product (TYC Part No. 17-5719-00-9; LKQ Part No. KI2803130C) is attached as Exhibit 4.19. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '836 Patent.

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Fig. 1 of the '836 Patent



Infringing Product



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

T. Respondents' Infringement of the '989 Patent

179. 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 '989 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.

180. A claim chart that applies the '989 Patent to the Respondents' representative infringing product (TYC Par. 17-5546-00-9; LKQ Part No. KI2802107C) is attached as Exhibit 4.20. For example, a photograph of the Respondents' representative infringing product is reproduced below with Fig. 1 of the '989 Patent.

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Fig. 1 of the '989 Patent



Infringing Product



181. The claim chart illustrates that the Respondents' representative infringing product infringes the '989 Patent because the design of the Respondents' representative product is substantially identical to the design embodied in the '989 Patent, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Respondents' infringing product.

VII. SPECIFIC ACTS OF UNFAIR IMPORTATION AND SALE

182. 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.

183. On information and belief, the Respondents' Accused Products are manufactured, assembled, and/or packaged in Taiwan. *See Exhibits 5.06-5.25.* 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.*

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184. As detailed below, 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
'773 Patent	LKQ: KI2503141C; TYC: 20-9117-00-9	TYC Brothers (for Keystone)	Taiwan	12-Aug-2021	LKQ Online ³
'701 Patent	TYC: 20-9306-00-9; LKQ: KI2502157C	TYC Brothers	Taiwan	9-Sep-2021	LKQ Online
'506 Patent	TYC: 20-12559-00	TYC Brothers	Taiwan	22-Sep-2021	Rockauto ⁴
	LKQ: KI2502184C (Depo: 323-1134L-ACD2)	Depo	Taiwan	9-Sep-2021	LKQ Online
'931 Patent	LKQ: KI2503152C; TYC: 20-12733-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
'933 Patent	LKQ: KI2804112C; TYC: 11-6604-00-9	TYC Brothers	Taiwan	9-Sep-2021	LKQ Online
'963 Patent	LKQ: KI2805111C; TYC: 11-6613-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
'218 Patent	LKQ: KI2502171C; TYC: 20-9460-90-9	TYC Brothers	Taiwan	18-Jun-2021	LKQ Online
'975 Patent	LKQ: KI2502167C; TYC: 20-9516-00-9	TYC Brothers	Taiwan	15-Sep-2021	LKQ Online
'976 Patent	LKQ: KI2801141C; TYC: 11-6651-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
'871 Patent	LKQ: KI2804114C; TYC: 11-6726-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
'757 Patent	LKQ: KI2805117C; TYC: 11-6763-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
'762 Patent	LKQ: KI2802108C; TYC: 17-5564-00-9	TYC Brothers	Taiwan	27-Aug-2021	LKQ Online
'764 Patent	LKQ: KI2804119C; TYC: 11-6780-00-9	TYC Brothers	Taiwan	27-Aug-2021	LKQ Online
'222 Patent	TYC: 20-9891-00-9	TYC Brothers	Taiwan	22-Sep-2021	Rockauto

³ <https://www.lkqonline.com>

⁴ <https://www.rockauto.com>

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Asserted Patent	Representative Accused Product	Manufacturer	Country of Origin	Purchase Date	Purchase Store
	LKQ: KI2503196C (Depo: 323-1152R-AC2)	Depo	Taiwan	12-Aug-2021	LKQ Online
'223 Patent	TYC: 11-6956-00-9	TYC Brothers	Taiwan	22-Sep-2021	Rockauto
	LKQ: KI2805130C (Depo: 323-1957R-AC)	Depo	Taiwan	27-Aug-2021	LKQ Online
'311 Patent	LKQ: KI2502198C; TYC: 20-9822-00-9	TYC Brothers	Taiwan	14-Sep-2021	LKQ Online
'471 Patent	LKQ: KI2805132C; TYC: 11-6911-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
'833 Patent	LKQ: KI2503201C; TYC: 20-9905-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
'836 Patent	LKQ: KI2803130C; TYC: 17-5719-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online
'989 Patent	LKQ: KI2802107C; TYC: 17-5546-00-9	TYC Brothers	Taiwan	12-Aug-2021	LKQ Online

A. The TYC Respondents

185. 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 for sale and/or are being sold or offered for sale in various popular online marketplaces, such as Amazon⁵, eBay⁶, Walmart⁷, Rockauto⁸, 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. 20-9117-00-9) that infringes the '773 Patent is being sold or offered for sale in the United States in the above-

⁵ <https://www.amazon.com>

⁶ <https://www.ebay.com>

⁷ <https://www.walmart.com>

⁸ <https://www.rockauto.com>

mentioned marketplaces. The specific instances of importation and sale of the representative Accused Products are detailed below.⁹

i. Importation and Sale of Products Infringing the '773 Patent

186. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2009-2013 Kia Forte headlamps that infringe the '773 Patent. On information and belief, the Accused Products that infringe the '773 Patent include, but are not limited to, TYC Part Nos. 20-9118-00-1, 20-9118-00-9, 20-9118-00, 20-9118-00-1, 20-9117-00-1, 20-9117-00-9, 20-9117-00, and 20-9117-00-1. 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. 20-9117-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

187. Exhibit 5.47 is an order receipt dated August 12, 2021, and related invoices, reflecting the sale of a representative Accused Product (Keystone Part No. KI2503141C) that was purchased from LKQ Online in the United States and delivered to an address in the United States. On information and belief, this representative Accused Product was manufactured by the TYC Respondents (*see* the product label below indicating "TYC INTERNAL 20-9117-00-CR"; *see also* the other product label indicating "MFG PN# 20-9117-00-9(K)" in Exhibit 5.26) and is substantially identical to TYC Part No. 20-9117-00-9. Exhibit 5.26 shows the pictures of the

⁹ Kia 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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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 '701 Patent

188. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2013 Kia Optima headlamps that infringe the '701 Patent. On information and belief, the Accused Products that infringe the '701 Patent include, but are not limited to, TYC Part Nos. 20-12554-90-9, 20-12554-90-1, 20-12554-90, 20-12553-90-9, 20-12553-90-1, 20-12553-90, 20-9306-00, 20-9306-00-9, 20-9306-00-1, 20-9305-00, 20-9305-00-9, 20-9305-00-1, 20-12554-00-1, 20-12554-00, 20-12553-00-1, and 20-12553-00. 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 5.07 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9306-00-9) 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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189. Exhibit 5.49 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 5.27 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.”



iii. Importation and Sale of Products Infringing the '506 Patent

190. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2013-2016 Kia Sportage headlamps that infringe the '506 Patent. On information and belief, the Accused Products that infringe the '506 Patent include, but are not limited to, TYC Part Nos. 20-12560-00, 20-12560-00-1, and 20-12559-00, 20-12559-00-1. 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. 20-12559-00) 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.

191. Exhibit 5.52 is an order receipt dated September 22, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from Rockauto in the United States and delivered to an address in the United States. 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.”



iv. Importation and Sale of Products Infringing the '931 Patent

192. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2012-2013 Kia Soul headlamps that infringe the '931 Patent. On information and belief, the Accused Products that infringe the '931 Patent include, but are not limited to, TYC Part Nos. 20-12733-00, 20-12733-00-9, 20-12733-00-1, 20-12734-00, 20-12734-00-9, and 20-12734-00-1. 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 5.09 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-12733-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

193. Exhibit 5.47 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 5.29 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."



v. Importation and Sale of Products Infringing the '933 Patent

194. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Kia Forte taillamps that infringe the '933 Patent. On information and belief, the Accused Products that infringe the '933 Patent include, but are not limited to, TYC Part Nos. 11-6604-00-1, 11-6604-00, 11-6604-00-9, 11-6603-00-1, 11-6603-00,

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and 11-6603-00-9. 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 5.10 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6604-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

195. Exhibit 5.49 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 5.30 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."



vi. Importation and Sale of Products Infringing the '963 Patent

196. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2015 Kia Sorento taillamps that infringe the '963 Patent.

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On information and belief, the Accused Products that infringe the '963 Patent include, but are not limited to, TYC Part Nos. 11-6613-00-9, 11-6613-00-1, 11-6613-00, 11-6614-00-9, 11-6614-00-1, and 11-6614-00. 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 5.11 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6613-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

197. Exhibit 5.47 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."



vii. Importation and Sale of Products Infringing the '218 Patent

198. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Kia Forte headlamps that infringe the '218 Patent. On information and belief, the Accused Products that infringe the '218 Patent include, but are not limited to, TYC Part Nos. 20-9461-00-1, 20-9461-00, 20-9462-00-1, 20-9462-00, 20-9460-90-1, 20-9460-90, 20-9460-90-9, 20-9460-80-1, 20-9460-80, and 20-9460-80-9. 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 5.12 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9460-90-9) 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 5.46 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 5.32 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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viii. Importation and Sale of Products Infringing the '975 Patent

200. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2019 Kia Soul headlamps that infringe the '975 Patent. On information and belief, the Accused Products that infringe the '975 Patent include, but are not limited to, TYC Part Nos. 20-9515-00-9, 20-9515-00-1, 20-9515-00, 20-9516-00-9, 20-9516-00-1, and 20-9516-00. 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 5.13 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9516-00-9) 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 5.51 is an order receipt dated August 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 5.33 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.”



ix. Importation and Sale of Products Infringing the '976 Patent

202. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2019 Kia Soul taillamps that infringe the '976 Patent. On information and belief, the Accused Products that infringe the '976 Patent include, but are not limited to, TYC Part Nos. 11-6651-00-9, 11-6651-00-1, 11-6651-00, 11-6652-00-9, 11-6652-00-1, and 11-6652-00. 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 5.14 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6651-00-9) 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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203. Exhibit 5.47 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.”

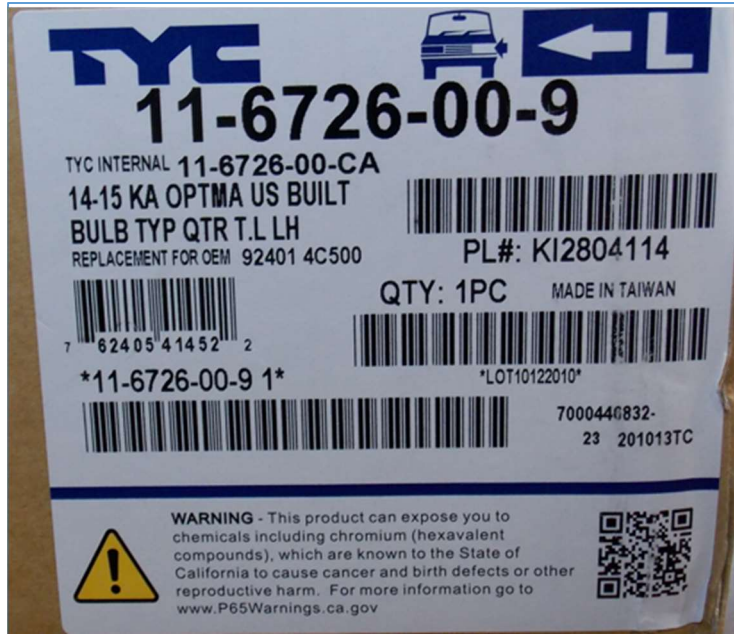


x. Importation and Sale of Products Infringing the '871 Patent

204. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2015 Kia Optima taillamps that infringe the '871 Patent. On information and belief, the Accused Products that infringe the '871 Patent include, but are not limited to, TYC Part Nos. 11-6725-00-1, 11-6725-00, 11-6725-00-9, 11-6726-00-1, 11-6726-00, and 11-6726-00-9. 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. 11-6726-00-9) 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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205. Exhibit 5.47 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.”



xi. Importation and Sale of Products Infringing the '757 Patent

206. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2015-2018 Kia Sedona taillamps that infringe the '757 Patent. On information and belief, the Accused Products that infringe the '757 Patent include, but are not limited to, TYC Part Nos. 11-6764-00-1, 11-6764-00-9, 11-6763-00-1, 11-6763-00, and 11-6763-00-9. 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 5.16 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6763-00-9) 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.

207. Exhibit 5.47 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.”



xii. Importation and Sale of Products Infringing the '762 Patent

208. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Kia Sorento taillamps that infringe the '762 Patent. On information and belief, the Accused Products that infringe the '762 Patent include, but are not limited to, TYC Part Nos. 17-5563-00-1, 17-5563-00-9, 17-5563-00, 17-5564-00-1, 17-5564-00-9, and 17-5564-00. 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

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States. Exhibit 5.17 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 17-5564-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

209. Exhibit 5.48 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 5.37 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."



xiii. Importation and Sale of Products Infringing the '764 Patent

210. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Kia Sorento taillamps that infringe the '764 Patent. On information and belief, the Accused Products that infringe the '764 Patent include, but are not limited to, TYC Part Nos. 11-6779-00-1, 11-6779-00-9, 11-6779-00, 11-6780-00-1, 11-6780-00-9, and 11-6780-00. 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 5.18 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6780-00-9) 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 5.48 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 5.38 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."



xiv. Importation and Sale of Products Infringing the '222 Patent

212. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Kia Optima headlamps that infringe the '222 Patent. On information and belief, the Accused Products that infringe the '222 Patent include, but are

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not limited to, TYC Part Nos. 20-9891-00, 20-9891-00-9, 20-9891-00-1, 20-9892-00, 20-9892-00-9, and 20-9892-00-1. 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 5.19 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9891-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

213. Exhibit 5.52 is an order receipt dated September 22, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from Rockauto 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."



xv. Importation and Sale of Products Infringing the '223 Patent

214. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2020 Kia Optima taillamps that infringe the '223 Patent. On information and belief, the Accused Products that infringe the '223 Patent include, but are not limited to, TYC Part Nos. 11-6955-00, 11-6955-00-1, 11-6955-00-9, 11-6956-00, 11-6956-00-1, and 11-6956-00-9. 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. 11-6956-00-9) 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 5.52 is an order receipt dated September 22, 2021, and related invoices reflecting the sale of the representative Accused Product that was purchased from Rockauto in 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."

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xvi. Importation and Sale of Products Infringing the '311 Patent

216. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2021 Kia Sportage headlamps that infringe the '311 Patent. On information and belief, the Accused Products that infringe the '311 Patent include, but are not limited to, TYC Part Nos. 20-9821-90, 20-9821-90-1, 20-9821-90-9, 20-9822-90, 20-9822-90-1, 20-9822-90-9, 20-9822-00, 20-9822-00-9, 20-9822-00-1, 20-9821-00, 20-9821-00-9, and 20-9821-00-1. 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 5.21 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9822-00-9) 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 5.50 is an order receipt dated September 14, 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 5.41 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.”



xvii. Importation and Sale of Products Infringing the '471 Patent

218. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2019 Kia Sportage taillamps that infringe the '471 Patent. On information and belief, the Accused Products that infringe the '471 Patent include, but are not limited to, TYC Part Nos. 11-6911-00, 11-6911-00-9, 11-6911-00-1, 11-6912-00, 11-6912-00-9, and 11-6912-00-1. 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 5.22 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 11-6911-00-9) 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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219. Exhibit 5.47 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 5.42 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.”



xviii. Importation and Sale of Products Infringing the '833 Patent

220. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2018 Kia Forte headlamps that infringe the '833 Patent. On information and belief, the Accused Products that infringe the '833 Patent include, but are not limited to, TYC Part Nos. 20-9906-00, 20-9906-00-9, 20-9906-00-1, 20-9905-00, 20-9905-00-9, and 20-9905-00-1. 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 5.23 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 20-9905-00-9) from the Respondent Genera's part-search

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

221. Exhibit 5.47 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.”



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

222. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2018 Kia Forte 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. 17-5719-00, 17-5719-00-1, 17-5719-00-9, 17-5720-00, 17-5720-00-1, and 17-5720-00-9. 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.

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Exhibit 5.24 is printouts of the product description and product images of a representative Accused Product (*i.e.*, TYC Part No. 17-5719-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

223. Exhibit 5.47 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 5.44 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."



xx. Importation and Sale of Products Infringing the '989 Patent

224. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2015-2018 Kia Sedona taillamps that infringe the '989 Patent. On information and belief, the Accused Products that infringe the '989 Patent include, but are not limited to, TYC Part Nos. 17-5545-00-1, 17-5545-00-9, 17-5546-00-1, and 17-5546-00-9.

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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. 17-5546-00-9) from the Respondent Genera's part-search website. The product description reflects that Taiwan is the country of origin for the representative Accused Product.

225. Exhibit 5.47 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 5.45 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."



B. The LKQ Respondents

226. 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

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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.¹⁰

i. Importation and Sale of Products Infringing the '773 Patent

227. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2009-2013 Kia Forte headlamps that infringe the '773 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. KI2503141C; TYC Part No. 20-9117-00-9) from the LKQ Online store. Exhibit 5.47 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.

228. Exhibit 5.53 is printouts of the product descriptions of the representative Accused Product from the LKQ Online store. Exhibit 5.26 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 '701 Patent

229. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2011-2013 Kia Optima headlamps that infringe the '701 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC

¹⁰ Kia 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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Respondents' Accused Products identified above in Section VII.A.ii. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. KI2502157C; TYC Part No. 20-9306-00-9) from the LKQ Online store. Exhibit 5.49 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.

230. Exhibit 5.54 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.ii, the representative Accused Product is labeled "MADE IN TAIWAN."

iii. Importation and Sale of Products Infringing the '506 Patent

231. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2013-2016 Kia Sportage headlamps that infringe the '506 Patent. The LKQ Respondents' Accused Products include, but are not limited to, LKQ Part Nos. KI2502184C and KI2503184C. On information and belief, the LKQ Respondents' Accused Products also include 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. KI2502184C; Depo Part No. 323-1134L-ACD2) from the LKQ Online store. Exhibit 5.49 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.

232. Exhibit 5.55 is printouts of the product descriptions of the representative Accused Product from the LKQ Online store. Exhibit 5.56 shows the pictures of the product packaging

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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 '931 Patent

233. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2012-2013 Kia Soul headlamps that infringe the '931 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. KI2503152C; TYC Part No. 20-12733-00-9) from the LKQ Online store. Exhibit 5.47 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.

234. 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.iv, the representative Accused Product is labeled “MADE IN TAIWAN.”

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v. Importation and Sale of Products Infringing the '933 Patent

235. The TYC Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Kia Forte taillamps that infringe the '933 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. KI2804112C; TYC Part No. 11-6604-00-9) from the LKQ Online store. Exhibit 5.49 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.

236. 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.v, the representative Accused Product is labeled "MADE IN TAIWAN."

vi. Importation and Sale of Products Infringing the '963 Patent

237. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2015 Kia Sorento taillamps that infringe the '963 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. KI2805111C; TYC Part No. 11-6613-00-9) from the LKQ Online store. Exhibit 5.47 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 5.59 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

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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 ’218 Patent

239. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2016 Kia Forte headlamps that infringe the ’218 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 Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. KI2502171C; TYC Part No. 20-9460-90-9) from the LKQ Online store. Exhibit 5.46 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.

240. Exhibit 5.60 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.vii, the representative Accused Product is labeled “MADE IN TAIWAN.”

viii. Importation and Sale of Products Infringing the ’975 Patent

241. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2019 Kia Soul headlamps that infringe the ’975 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. KI2502167C; TYC Part No. 20-9516-00-9) from the LKQ Online store. Exhibit 5.51 is an order receipt dated August 15, 2021,

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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 5.61 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.viii, the representative Accused Product is labeled “MADE IN TAIWAN.”

ix. Importation and Sale of Products Infringing the '976 Patent

243. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2019 Kia Soul taillamps that infringe the '976 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. KI2801141C; TYC Part No. 11-6651-00-9) from the LKQ Online store. Exhibit 5.47 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 5.62 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.ix, the representative Accused Product is labeled “MADE IN TAIWAN.”

x. Importation and Sale of Products Infringing the '871 Patent

245. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2014-2015 Kia Optima taillamps that infringe the '871 Patent. The LKQ Respondents' Accused Products include, but are not limited to, at least one of the TYC

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Respondents' Accused Products identified above in Section VII.A.x. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. KI2804114C; TYC Part No. 11-6726-00-9) from the LKQ Online store. Exhibit 5.47 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.

246. 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.x, the representative Accused Product is labeled "MADE IN TAIWAN."

xi. Importation and Sale of Products Infringing the '757 Patent

247. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2015-2018 Kia Sedona taillamps that infringe the '757 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. KI2805117C; TYC Part No. 11-6763-00-9) from the LKQ Online store. Exhibit 5.47 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 5.64 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.xi, the representative Accused Product is labeled "MADE IN TAIWAN."

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xii. Importation and Sale of Products Infringing the '762 Patent

249. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Kia Sorento taillamps that infringe the '762 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 Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. KI2802108C; TYC Part No. 17-5564-00-9) from the LKQ Online store. Exhibit 5.48 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.

250. 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.xii, the representative Accused Product is labeled "MADE IN TAIWAN."

xiii. Importation and Sale of Products Infringing the '764 Patent

251. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Kia Sorento taillamps that infringe the '764 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. KI2804119C; TYC Part No. 11-6780-00-9) from the LKQ Online store. Exhibit 5.48 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.

252. 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

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and label of the representative Accused Product. As reproduced above in Section VII.A.xiii, the representative Accused Product is labeled “MADE IN TAIWAN.”

xiv. Importation and Sale of Products Infringing the ’222 Patent

253. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2018 Kia Optima headlamps that infringe the ’222 Patent. The LKQ Respondents’ Accused Products include, but are not limited to, LKQ Part Nos. KI2503196C and KI2502196C. On information and belief, the LKQ Respondents’ Accused Products also include 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. KI2503196C; Depo Part No. 323-1152R-AC2) from the LKQ Online store. Exhibit 5.47 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 5.67 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.68 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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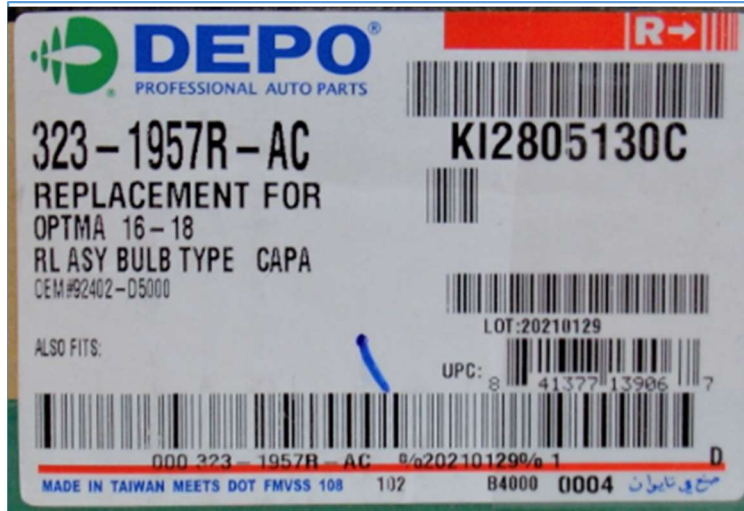


xv. Importation and Sale of Products Infringing the '223 Patent

255. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2016-2020 Kia Optima taillamps that infringe the '223 Patent. The LKQ Respondents' Accused Products include, but are not limited to, LKQ Part Nos. KI2805130C and KI2804130C. On information and belief, the LKQ Respondents' Accused Products also include 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. KI2805130C; Depo Part No. 323-1957R-AC) from the LKQ Online store. Exhibit 5.48 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.

256. Exhibit 5.69 is printouts of the product descriptions of the representative Accused Product from the LKQ Online Store. Exhibit 5.70 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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xvi. Importation and Sale of Products Infringing the '311 Patent

257. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2021 Kia Sportage headlamps that infringe the '311 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. KI2502198C; TYC Part No. 20-9822-00-9) from the LKQ Online store. Exhibit 5.50 is an order receipt dated September 14 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 5.71 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.xvi, the representative Accused Product is labeled "MADE IN TAIWAN."

xvii. Importation and Sale of Products Infringing the '471 Patent

259. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2019 Kia Sportage taillamps that infringe the '471 Patent.

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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 Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. KI2805132C; TYC Part No. 11-6911-00-9) from the LKQ Online store. Exhibit 5.47 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.

260. Exhibit 5.72 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.xvii, the representative Accused Product is labeled "MADE IN TAIWAN."

xviii. Importation and Sale of Products Infringing the '833 Patent

261. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2018 Kia Forte headlamps that infringe the '833 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. KI2503201C; TYC Part No. 20-9905-00-9) from the LKQ Online store. Exhibit 5.47 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 5.73 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.xviii, the representative Accused Product is labeled "MADE IN TAIWAN."

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

263. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2017-2018 Kia Forte 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.xix. The Complainants purchased a representative Accused Product (*i.e.*, LKQ Part No. KI2803130C; TYC Part No. 17-5719-00-9) from the LKQ Online store. Exhibit 5.47 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 5.74 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.xix, the representative Accused Product is labeled "MADE IN TAIWAN."

xx. Importation and Sale of Products Infringing the '989 Patent

265. The LKQ Respondents have imported, sold for importation, and/or sold within the United States after importation 2015-2018 Kia Sedona taillamps that infringe the '989 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. KI2802107C; TYC Part No. 17-5546-00-9) from the LKQ Online store. Exhibit 5.47 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.

266. Exhibit 5.75 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

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and label of the representative Accused Product. As reproduced above in Section VII.A.xx, the representative Accused Product is labeled “MADE IN TAIWAN.”

VIII. RELATED LITIGATION

267. 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.

268. On May 28, 2021, KC filed a complaint in the United States District Court for the Central District of California, Case No. 8:21-cv-00966, asserting, *inter alia*, infringement of KC’s twenty (20) design patents by Respondents TYC and Genera. The Asserted Patents in this investigation overlap with fourteen (14) of those twenty design patents. This action is currently pending.

269. 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-03166, seeking declaratory judgment of noninfringement and/or invalidity of Kia’s fourteen (14) U.S. design patents. The Asserted Patents in this investigation overlap with ten (10) of those fourteen design patents. This action is currently pending.

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

270. 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.

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X. DOMESTIC INDUSTRY

271. A domestic industry under 19 U.S.C. §§ 1337(a)(2)-(3)(C) exists by virtue of the actions of Kia 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

272. Kia has made, and continues to make, significant and substantial investments in plant and equipment, labor and capital, and engineering and research and development with respect to the products that practice one or more of the Asserted Patents (“Kia DI Products”).

273. Kia 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 Kia DI Products practice the Asserted Patents are attached as Exhibits 6.01-6.20, which are summarized in the table below. All other Kia DI Products practice the claims of the Asserted Patents substantially in the same manner as demonstrated in Exhibits 6.01-6.20.

Table 3 – Representative Kia DI Products

Asserted Patent	Representative Kia DI Product	Exhibit No.
The '773 Patent	921011M230	6.01
The '701 Patent	921012T121	6.02
The '506 Patent	921013W510	6.03
The '931 Patent	921022K540	6.04
The '933 Patent	92401A7000	6.05
The '963 Patent	924011U500	6.06
The '218 Patent	92102A7220	6.07
The '975 Patent	92102B2270	6.08

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Asserted Patent	Representative Kia DI Product	Exhibit No.
The '976 Patent	92402B2010	6.09
The '871 Patent	924024C500	6.10
The '757 Patent	92402A9020	6.11
The '762 Patent	92403C6000	6.12
The '764 Patent	92402C6000	6.13
The '222 Patent	92101D5000	6.14
The '223 Patent	92402D5000	6.15
The '311 Patent	92102D9111	6.16
The '471 Patent	92402D9020	6.17
The '833 Patent	92101B0701	6.18
The '836 Patent	92404B0600	6.19
The '989 Patent	92406A9000	6.20

B. The Economic Prong

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

275. 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

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perceived and their signals understood, both in daylight and in darkness or other conditions of reduced visibility.” *Id.* at S2, Purpose.

276. 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 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.

277. 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

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

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a. Mobis Parts America

279. 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]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The parts that are sourced through these authorized supply chains for the United States market are Hyundai and Kia Genuine Parts. Ex. 7.04C, Confidential Declaration of Samuel Sohn, dated December 7, 2021 (“Sohn Decl.”), ¶ 3.

280. 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.

281. 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.

282. 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.

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283. 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.

284. 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.

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

286. Table 4 below provides, for the years 2016 through the first half of 2021, MPA's U.S. sales for the Kia lamps covered by each Asserted Patent as a percentage of MPA's total U.S. sales of all Kia parts over that same time period. *Id.* ¶¶ 15-16; *id.* Exs. B-C.

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

Asserted Patent	2016-21 Revenue Percentage
The '773 Patent	[REDACTED]
The '701 Patent	[REDACTED]
The '506 Patent	[REDACTED]
The '931 Patent	[REDACTED]
The '933 Patent	[REDACTED]
The '963 Patent	[REDACTED]
The '218 Patent	[REDACTED]
The '975 Patent	[REDACTED]
The '976 Patent	[REDACTED]
The '871 Patent	[REDACTED]
The '757 Patent	[REDACTED]
The '762 Patent	[REDACTED]

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Asserted Patent	2016-21 Revenue Percentage
The '764 Patent	
The '222 Patent	
The '223 Patent	
The '311 Patent	
The '471 Patent	
The '833 Patent	
The '836 Patent	
The '989 Patent	

b. *Kia Georgia*

287. Approximately [REDACTED] of Kia vehicles sold in the United States are currently manufactured in the United States by Kia Georgia, Inc. (“Kia Georgia”), a wholly-owned subsidiary of Kia America located in West Point, Georgia. Kia America has invested approximately \$1.8 billion dollars in Kia Georgia to create a domestic automotive plant that currently produces 340,000 Kia vehicles per year. Ex. 7.04C, Confidential Declaration of Mark Sullivan, dated December 9, 2021 (“Sullivan Decl.”), ¶ 3. Kia Georgia’s production facility has an area of approximately 2.2 million square-feet and resides on 2,200 acres of land. It consists of a stamping shop, welding shop, paint shop, and a general assembly shop. *Id.* ¶ 4.

288. Kia Georgia has also made significant investments in equipment necessary for fulfilling its corporate purpose and operations in the United States. The average depreciated total asset value for machinery and other equipment utilized by Kia Georgia for the years 2017 through July 2021 was [REDACTED]. This machinery and other equipment are used for manufacturing Kia vehicles and includes chambers, ovens, robots, stacker cranes, press machine, carriers, battery chargers, conveyor lines, as well as equipment used for installment, testing, and

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quality control of Kia taillamps and a larger component assembly that includes headlamps.

Id. ¶¶ 5-6.

289. From 2017 through July 2021, approximately [REDACTED] of Kia vehicles sold in the United States were domestically manufactured by Kia Georgia in West Point, Georgia. Kia Georgia utilizes genuine Kia vehicle parts, including headlamps and taillamps, that are specifically designed and packaged for sale and use in the United States in manufacturing Kia vehicles. *Id.* ¶¶ 13-14.

290. The total number of Kia vehicles produced by Kia Georgia in Georgia and sold to Kia America from the years 2017 through 2021 (through July) was approximately [REDACTED]. The gross revenue from these vehicles made in Georgia for the years 2017 through 2020 was approximately \$ [REDACTED]. *Id.* ¶¶ 15-19.

c. Kia America

291. Kia America is a California corporation formed in 1992 and has its headquarters in Irvine, California. Kia America is responsible for marketing, distribution, product planning research, sales, and service-related engineering functions for Kia vehicles in the United States, as well as the promotion and facilitation of its vehicle warranty programs and quality control for Kia vehicles in the United States. Ex. 7.01C, Confidential Declaration of Jay Lee, dated December 13, 2021 (“Lee Decl.”), ¶ 3.

292. Kia America owns the building and land from which it operates its Irvine, California corporate offices (the “Irvine Campus”). The Irvine Campus serves as Kia’s headquarters in the United States and houses Kia America’s divisions encompassing Service/Aftersales, Sales, Marketing, Legal, and Kia America Finance (including Internal Audit). The Irvine Campus also houses Kia North America’s divisions encompassing Business

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Administration, Business Strategy (including Regional Strategy Management), Product Strategy & Planning, Ownership Experience (including Product Quality), Brand Experience, Digital Technology, Safety Office, and Kia North America Finance. Kia America's Service/Aftersales division provides guidance for the parts and service operations (including headlamps and taillamps and related service operations), facilitates Kia America's warranty programs and customer call centers, and contributes to parts and accessories sales objectives. *Id.* ¶ 4.

293. Kia America's 21.7-acre Irvine Campus—a \$130 million investment—was opened in June 2008. The Kia Design Center America is a state-of-the-art 100,700-square-foot facility located on Kia America's Irvine Campus. The Design Center features extensive design and modeling studios, workshops, and presentation rooms. *Id.* ¶¶ 5, 11.

294. Kia America also has five Regional Offices, eight Technical Training Centers, and nine Parts Distribution Centers. Kia America's Regional Offices and Technical Training Centers support Kia's network of over 775 Kia dealers in 49 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 Kia America's national objectives. *Id.* ¶¶ 6-9.

295. For the years 2017-2021, Kia America has expended a total of approximately [REDACTED] to lease property utilized by the regional offices and technical training centers. *Id.* ¶ 10.

296. Kia America has also made significant investments in equipment necessary for fulfilling their corporate purpose and operations in the United States. The net book value for office, computer, service, demonstration, and other equipment utilized by Kia America in its

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corporate and regional offices, technical training centers, and parts distribution centers for 2021 is approximately \$[REDACTED]. This equipment was used to support and direct Kia America's operations, distribution, marketing, advertising, sales and warranty activities for Kia vehicles and Kia Genuine Parts, including headlamps and taillamps. *Id.* ¶¶ 12-13.

297. Kia America markets and distributes Kia vehicles across the United States through its authorized dealer network and provides warranty services on all new Kia vehicles in the United States. From 2018 through 2021 (through July), Kia America sold approximately [REDACTED] vehicles to U.S. dealers. The approximate gross revenue from these wholesale activities is [REDACTED]. *Id.* ¶¶ 22-26.

d. HATCI

298. Hyundai America Technical Center, Inc. ("HATCI") is a wholly-owned subsidiary of Hyundai Motor Company ("HMC") and 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, Confidential Declaration of Seokjoon Hong, dated December 1, 2021 ("Hong Decl."), ¶¶ 1-3.

299. HMC is a 33.88% shareholder of Kia Corporation, and both HMC and Kia Corporation are part of the Hyundai Motor Group. HATCI leases from Hyundai Motor America, Inc. ("HMA"), a wholly-owned subsidiary of HMC, a 227,873 square-foot facility located in Superior Township, Michigan, which serves as HATCI's main R&D center. *Id.* ¶ 4.

300. Kia America has a 21.7-acre corporate campus in Irvine, California, representing a total investment of \$130 million. It includes the Kia Design Center, a state-of-the-art, 100,700-

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square-foot facility featuring extensive design and modeling studios, workshops, and presentation rooms. The Kia Design Center is currently utilized by HATCI for vehicle design R&D. *Id.* ¶ 5.

301. HATCI operates 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. Construction began in February 2004 and was substantially completed by October 2004. 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. The California Proving Ground also includes a 30,000 square-foot office complex. *Id.* ¶ 6.

e. SL America

302. For Kia 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 Kia for its vehicles since the 2013 vehicle models. For example, SLC has manufactured and supplied at least the following

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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.

Kia Part No.	Kia Model	Model Year	Part Description	Asserted Patent
92101D5000	Optima	2015	Headlamp	The '222 Patent
92102D5000	Optima	2015	Headlamp	The '222 Patent
924014C500	Optima	2013	Taillamp (RCO)	The '871 Patent
924024C500	Optima	2013	Taillamp (RCO)	The '871 Patent
92401C6000	Sorento	2014	Taillamp (RCO)	The '764 Patent
92402C6000	Sorento	2014	Taillamp (RCO)	The '764 Patent
92403C6000	Sorento	2014	Taillamp (RCI)	The '762 Patent
92404C6000	Sorento	2014	Taillamp (RCI)	The '762 Patent

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

303. As described above, the sum of MPA's lease expenses (¶281), equipment values (¶282), and other operating expenses (¶283); Kia Georgia's equipment values (¶288); and Kia America's lease expenses (¶295) and equipment values (¶296) 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 '773 Patent	[REDACTED]	[REDACTED]
The '701 Patent	[REDACTED]	[REDACTED]
The '506 Patent	[REDACTED]	[REDACTED]
The '931 Patent	[REDACTED]	[REDACTED]
The '933 Patent	[REDACTED]	[REDACTED]
The '963 Patent	[REDACTED]	[REDACTED]
The '218 Patent	[REDACTED]	[REDACTED]
The '975 Patent	[REDACTED]	[REDACTED]
The '976 Patent	[REDACTED]	[REDACTED]
The '871 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 '757 Patent		
The '762 Patent		
The '764 Patent		
The '222 Patent		
The '223 Patent		
The '311 Patent		
The '471 Patent		
The '833 Patent		
The '836 Patent		
The '989 Patent		

ii. Significant Employment of Labor

a. Mobis Parts America

304. 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. Kia Georgia

305. Kia Georgia employees are responsible for manufacturing Kia vehicles, sourcing component parts, and operating Kia Georgia's stamping shop, welding shop, paint shop and general assembly shop, in West Point, Georgia. All Kia Georgia employees work directly or indirectly on the manufacture of Kia vehicles. From 2016 through 2020, Kia Georgia employed an average of [REDACTED] employees, and its combined gross payroll for those years was [REDACTED] Ex. 7.04C, Sullivan Decl., ¶¶ 7-12.

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c. Kia America

306. Kia America’s corporate and regional office employees are responsible for, among other things, operations, marketing, customer service, parts distribution, dealer support, and facilitating Kia America’s warranty programs. All of these activities directly or indirectly support Kia products, including Kia headlamps and taillamps. Ex. 7.01C, Lee Decl., ¶ 14.

307. Kia America sells replacement Kia 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 Kia America’s vehicle warranty programs. The total expenditures paid to Kia dealers in the United States for repairs and services performed under Kia America’s vehicle warranty program for the years 2017 through 2021 (through July) are approximately [REDACTED]. Of this amount, approximately [REDACTED] is attributable solely to the cost of replacement parts. *Id.*, ¶¶ 28-29.

308. From the years 2018 through 2021 (through July), Kia America employed an average of approximately [REDACTED] employees at its headquarters in Irvine, California, and at its five regional offices, with a total combined annual gross pay of [REDACTED] over those years. *Id.* ¶¶ 15-18.

309. Kia America operates two types of call centers from its Irvine, California headquarters and other U.S. locations. First, Kia America has what is known as a “Techline” for dealers and their technicians to use in obtaining assistance from Kia America on vehicle repair and warranty work questions. Second, Kia America has a retail-facing call center called the Kia Consumer Assistance Center (“KCAC”) for customers and vehicle owners to use in answering common vehicle questions and addressing concerns about their purchased vehicles, including

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warranty related inquiries. Kia America's labor expenditures in connection with the KCAC and Techline for the years 2017 through June 2021 totaled approximately [REDACTED]. *Id.* ¶¶ 19-21.

310. Kia has also made a significant investment in the United States in the employment of labor in connection with the manufacture, distribution, promotion, marketing, and advertising of Kia automobiles and distribution and selling of Kia Genuine Parts, including headlamps and taillamps. *Id.*, ¶¶ 19-38.

d. Allocation of Labor Expenses to Each Asserted Patent

311. As described above, the sum of MPA's payroll (¶304), Kia Georgia's payroll (¶305), and Kia America's payroll (¶308) 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 '773 Patent	[REDACTED]	[REDACTED]
The '701 Patent	[REDACTED]	[REDACTED]
The '506 Patent	[REDACTED]	[REDACTED]
The '931 Patent	[REDACTED]	[REDACTED]
The '933 Patent	[REDACTED]	[REDACTED]
The '963 Patent	[REDACTED]	[REDACTED]
The '218 Patent	[REDACTED]	[REDACTED]
The '975 Patent	[REDACTED]	[REDACTED]
The '976 Patent	[REDACTED]	[REDACTED]
The '871 Patent	[REDACTED]	[REDACTED]
The '757 Patent	[REDACTED]	[REDACTED]
The '762 Patent	[REDACTED]	[REDACTED]
The '764 Patent	[REDACTED]	[REDACTED]
The '222 Patent	[REDACTED]	[REDACTED]
The '223 Patent	[REDACTED]	[REDACTED]

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Asserted Patent	2016-21 Revenue Percentage (from Table 4)	Labor Expenses Allocated to Each Patent
The '311 Patent		
The '471 Patent		
The '833 Patent		
The '836 Patent		
The '989 Patent		

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

312. As described below, Kia 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 Kia vehicles and parts, including headlamps and taillamps.

313. Kia 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 Kia dealers in the United States for repairs and services performed under Kia America's vehicle warranty program for the years 2017 through 2021 (through July) are approximately [REDACTED]. Of this amount, approximately \$[REDACTED] is attributable solely to the cost of replacement parts. Ex. 7.01C, Lee Decl., ¶¶ 28-29.

314. Table 8 below allocates the total expenditures paid to Kia dealers in the United States for repairs and services performed under Kia America's vehicle warranty program for the years 2017 through 2021 (through July) in the amount of [REDACTED] to each of the Asserted Patents by using the percentages calculated in Table 4 above.

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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 '773 Patent		
The '701 Patent		
The '506 Patent		
The '931 Patent		
The '933 Patent		
The '963 Patent		
The '218 Patent		
The '975 Patent		
The '976 Patent		
The '871 Patent		
The '757 Patent		
The '762 Patent		
The '764 Patent		
The '222 Patent		
The '223 Patent		
The '311 Patent		
The '471 Patent		
The '833 Patent		
The '836 Patent		
The '989 Patent		

315. Kia 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.

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316. The Kia Design Center 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. *Id.* ¶¶5-6.

317. For each Kia vehicle model sold and/or developed in the United States, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* ¶7.

318. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED] . *Id.* ¶ 8.

319. Since 2015, exemplary expenses by HATCI for R&D and design activities in the United States relating to lighting products for Kia vehicles include approximately [REDACTED] relating to lighting products for the Kia Sorento (MQ4), Kia Telluride (ON), Kia Soul (SK3), Kia Niro (SG2), and Kia Carnival (KA4) vehicles. *Id.* ¶¶ 9-14.

320. Kia has made a substantial investment in the United States advertising, marketing, and promoting its vehicles, which include the headlamps and taillamps covered by the Asserted Patents, in advertising during sports, cultural and other programs in the United States. Ex. 7.01C, Lee Decl., ¶¶ 30-34. A significant factor in that advertising is promoting the ornamental design of Kia 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. Kia exploits the Asserted Patents protecting its ornamental lamp designs by promoting those ornamental designs in its marketing and advertising.

321. From the years 2017-2020, Kia America spent a total of approximately \$[REDACTED] in media advertising. Ex. 7.01C, Lee Decl., ¶¶ 35-38. Table 9 below allocates those media advertising expenditures to each of the Asserted Patents by using the percentages calculated in Table 4 above.

PUBLIC VERSION

Table 9 – Allocation of Media Advertising Expenses to Each Asserted Patent

Asserted Patent	2016-21 Revenue Percentage (from Table 4)	Advertising Expenses Allocated to Each Patent
The '773 Patent		
The '701 Patent		
The '506 Patent		
The '931 Patent		
The '933 Patent		
The '963 Patent		
The '218 Patent		
The '975 Patent		
The '976 Patent		
The '871 Patent		
The '757 Patent		
The '762 Patent		
The '764 Patent		
The '222 Patent		
The '223 Patent		
The '311 Patent		
The '471 Patent		
The '833 Patent		
The '836 Patent		
The '989 Patent		

322. In view of the foregoing, it is apparent that Kia 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).

PUBLIC VERSION

XI. REQUEST FOR RELIEF

323. WHEREFORE, Kia respectfully requests that the United States International Trade Commission:

- 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 other 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;

PUBLIC VERSION

- 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 Kia's domestic industry relating to the Asserted Patents; and
- 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 15, 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 Kia Corporation's Intellectual Property Legal Team in Seoul, Korea, and am duly authorized to sign this Complaint on behalf of Kia;

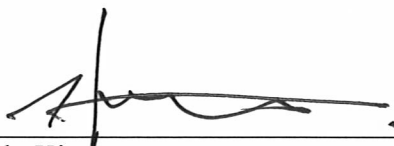
2. I have read the foregoing Complaint and am aware of its contents;

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 15 day of December 2021.



Seungdo Kim