

SECURE AXCESS, LLC,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	CIVIL ACTION NO.
	§	
ACCELL CORPORATION,	§	
DIAMOND MULTIMEDIA, INC.,	§	
HEWLETT PACKARD COMPANY,	§	
IOGEAR, INC.,	§	
ACCO BRANDS CORPORATION,	§	
LENOVO (UNITED STATES) INC.,	§	
LEANCORE L.L.C. d/b/a PLUGABLE	§	
TECHNOLOGIES,	§	
SEWELL DEVELOPMENT	§	
CORPORATION D/B/A SEWELL	§	
DIRECT,	§	
SIIG, INC.,	§	
STARTECH.COM USA L.L.P.,	§	
TARGUS, INC., TRIPP LITE	§	
HOLDINGS, INC.,	§	
TRIPPE MANUFACTURING CO.,	§	
and DISPLAYLINK CORP.	§	
	§	
Defendants.	§	JURY TRIAL DEMANDED
	§	

Plaintiff Secure Axxcess, LLC, (“S/A”) files this original complaint and asserts claims of patent infringement against Defendants Accell Corporation, Diamond Multimedia, Inc., Hewlett Packard Company, IOGear, Inc., ACCO Brands Corporation, Lenovo (United States) Inc., LeanCode L.L.C. d/b/a Plugable Technologies, Sewell Development Corporation d/b/a Sewell Direct, Siig, Inc., StarTech.com USA L.L.P., Targus, Inc., Tripp Lite Holdings, Inc., Trippe Manufacturing Company, and DisplayLink Corp.

## **I. INTRODUCTION**

1. S/A asserts claims of patent infringement under 35 U.S.C. §271 based on Defendants' direct infringement and active inducement of other parties to infringe United States Patent No. 6,522,309 (the "309 Patent") in this Judicial District and elsewhere in the United States of America without license or authorization.

## **II. THE PARTIES**

2. Plaintiff, S/A, is a limited liability company that is organized and that exists pursuant to the laws of the State of Texas with its principal place of business at 555 Republic Drive, Suite 200, Plano, Texas 75074. S/A is the owner of all right, title, and interest in and to the '309 Patent by assignment from the inventor.

3. Defendant, Accell Corporation ("Accell"), is a corporation that is organized and that exists pursuant to the laws of the State of California with its principal place of business at 3400 Gateway Blvd., Fremont, California, 94538. Accell engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, Accell may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the summons and the copy of the complaint, the Secretary of State will forward process to Accell's agent for receipt of service of process, Kuo Inru, 3400 Gateway Blvd., Fremont, California 94538.

4. Defendant, Diamond Multimedia, Inc. ("DMI"), is a corporation that is organized and that exists pursuant to the laws of the State of California with its principal place of business located at 20740 Plummer Street, Chatsworth, California 91311. DMI engages in business in

Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, DMI may be served with process by delivering a true and correct copy of this complaint, together with an original citation, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the summons and the copy of the complaint, the Secretary of State will forward process to DMI's chief executive officer, Bruce Zaman, at the corporate mailing address, 20740 Plummer Street, Chatsworth, California 91311.

5. Defendant, Hewlett Packard Company ("HP"), is a corporation that is organized and that exists pursuant to the laws of the State of California with its principal place of business at 3000 Hanover Street, Palo Alto, California 94304. HP is registered to do business in Texas and it may be served with process by delivering a summons and a true and correct copy of this complaint to its registered agent for receipt of service of process, CT Corporation System at 350 N. St. Paul St., Suite 2900, Dallas, Texas 75201-4234.

6. Defendant, IOGear, Inc. ("IOGear"), is a corporation that is organized and that exists pursuant to the laws of the State of California with its principal place of business at 19641 Da Vinci, Foothill Ranch, California 92610. IOGear engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, IOGear may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the summons and the copy of the complaint, the Secretary of State will forward process to IOGear's agent for receipt of service of process, Jack Wang, 19641 Da Vinci, Foothill Ranch, CA 92610.

7. Defendant, ACCO Brands Corporation (“ACCO”), is a corporation and existing under the laws of the State of Delaware with its principal place of business at 300 Tower Parkway, Lincolnshire, Illinois 60069. ACCO engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, ACCO may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the summons and the copy of the complaint, the Secretary of State will forward process to ACCO’s agent for receipt of service of process, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware, 19808.

8. Defendant, Lenovo (United States) Inc. (“Lenovo”), is a corporation organized and existing under the laws of the State of Delaware with its principal place of business at 1009 Think Place, Morrisville, North Carolina, 27560. Lenovo is registered to do business in Texas and it may be served with process by delivering a summons and a true and correct copy of this complaint to its registered agent for receipt of service of process, CT Corporation System at 350 N. St. Paul St., Suite 2900, Dallas, Texas 75201-4234.

9. Defendant, LeanCode LLC d/b/a Plugable Technologies (“Plugable”), is a limited liability company organized and existing under the laws of the State of Washington with its principal place of business at 40 Lake Bellevue Drive, Suite 100, Bellevue, Washington 98005. Plugable engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, Plugable may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas,

1019 Brazos Street, Austin, Texas 78701. Upon receipt of the summons and the copy of the complaint, the Secretary of State will forward process to Plugable's agent for receipt of service of process, Bernie Thompson, 536 129<sup>th</sup> Avenue SE, Bellevue, Washington 98005.

10. Defendant, Sewell Development Corporation d/b/a Sewell Direct ("Sewell"), is a corporation organized and existing under the laws of the State of Utah with its principal place of business at 3877 North 200 East, Provo, Utah, 8406. Sewell engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, Sewell may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the citation and the copy of the petition, the Secretary of State will forward process to Sewell's president, David S. Sewell, at the corporate mailing address of 3877 North 200 East, Provo, Utah 84604.

11. Defendant, Siig, Inc. ("Siig"), is a corporation organized and existing under the laws of the State of California with its principal place of business at 6078 Stewart Avenue, Fremont, California 94538. Siig engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, Siig may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the summons and the copy of the complaint, the Secretary of State will forward process to Siig's agent for receipt of service of process, Frank Liu, 6078 Stewart Avenue, Fremont, California, 94538.

12. Defendant, StarTech.com USA L.L.P. (“StarTech”), is a limited liability partnership organized and existing under the laws of Canada with its principal place of business at 45 Artisans Crescent, London, Ontario, Canada N5V 5E9. StarTech engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, StarTech may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the summons and the copy of the complaint, the Secretary of State will forward process to StarTech’s agent for receipt of service of process, CT Corporation System, 1300 East Ninth Street, Cleveland, Ohio 44114.

13. Defendant, Targus, Inc. (“Targus”), is a corporation organized and existing under the laws of the state of New York with its principal place of business at 1211 North Miller Street, Anaheim, California 92806. Targus is registered to do business in Texas and it may be served with process by delivering a summons and a true and correct copy of this complaint to its registered agent for receipt of service of process, CT Corporation System at 350 N. St. Paul St., Suite 2900, Dallas, Texas 75201-4234.

14. Defendant, Tripp Lite Holdings, Inc. (“Tripp Lite”), is a corporation and existing under the laws of the State of Illinois with its principal place of business at 1111 W. 35<sup>th</sup> Street, Chicago, IL 60609-1404. Tripp Lite engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, Tripp Lite may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the

summons and the copy of the complaint, the Secretary of State will forward process to Tripp Lite's agent for receipt of service of process, Illinois Corporation Service Company, 801 Adlai Stevenson Drive, Springfield, IL 62703.

15. Defendant, Trippe Manufacturing Company ("Trippe Manufacturing"), is a corporation and existing under the laws of the State of Illinois with its principal place of business at 1111 W. 35<sup>th</sup> Street, Chicago, IL 60609. Trippe Manufacturing engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, Trippe Manufacturing may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the summons and the copy of the complaint, the Secretary of State will forward process to Trippe Manufacturing's agent for receipt of service of process, Illinois Corporation Service Company, 801 Adlai Stevenson Drive, Springfield, IL 62703.

16. Defendant, DisplayLink Corp. ("DisplayLink"), is a corporation organized and existing under the laws of the state of Washington with its principal place of business at 480 S California Avenue, Suite 304, Palo Alto, California 94306. DisplayLink engages in business in Texas; however, it does not maintain a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, DisplayLink may be served with process by delivering a true and correct copy of this complaint, together with an original summons, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the summons and the copy of the complaint, the Secretary of State will forward process to DisplayLink's agent for receipt of service of process, CT Corporation System, 818 W 7<sup>th</sup> Street, Los Angeles, California 90017.

### III. JURISDICTION AND VENUE

17. This Court has original and exclusive jurisdiction over the subject matter of this case pursuant to 28 U.S.C. §§1331 and 1338(a) because the claims in this case arise under the Patent Act, 35 U.S.C. §271, *et seq.*

18. This Court has personal jurisdiction over the Defendants because each has sold its products in the State of Texas, actively has induced and/or has contributed to infringement of the ‘309 Patent in the State of Texas, and/or has established regular and systematic business contacts with the State of Texas.

19. This Court is an appropriate venue for this case pursuant to 28 U.S.C. §1400(b) because each of the Defendants is deemed to reside in this District pursuant to 28 U.S.C. §1391(c) and each has committed or has induced acts of infringement in this District.

20. Joinder of all Defendants is proper under Rule 20 of the Federal Rules of Civil Procedure and 35 U.S.C. §299. DisplayLink is jointly liable for infringement of the ‘309 Patent with the remaining Defendants. DisplayLink owns software and technology that enables computer users to practice methods of multi-screen display of images (the “DisplayLink Technology”). DisplayLink has licensed the DisplayLink Technology to the other Defendants and has provided the other Defendants with instructions and diagrams that teach computer users how to practice multi-screen display of computer images in a manner that infringes one or more claims of the ‘309 Patent. Each of the Defendants has utilized the DisplayLink Technology in one or more of its own products and has used some or all DisplayLink’s instructions and diagrams to induce other parties to infringe one or more of the methods claimed by the ‘309 Patent. Further, DisplayLink advertises one or more products offered by each of the Defendants



on DisplayLink's website. As such, S/A's patent infringement claims against all Defendants give rise to common questions of fact and issues of law.

#### **IV. CAUSE OF ACTION**

##### **S/A owns the '309 Patent.**

21. On February 18, 2003, the '309 Patent, entitled "Multiscreen Personal Computer Display Method And Apparatus," was duly and lawfully issued by the United States Patent and Trademark Office.

22. The '309 Patent was issued from United States Patent Application Serial No. 09/515,081, which was filed on February 28, 2000.

23. By written assignment dated May 29, 2010 and recorded with the United States Patent and Trademark Office on June 13, 2010, the '309 Patent was assigned by its sole inventor, Harold J. Weber, to Harold J. Weber, Trustee For SavvyStuff Property Trust.

24. By written assignment dated April 16, 2012 and recorded with the United States Patent and Trademark Office on July 30, 2012, Harold J. Weber, Trustee For SavvyStuff Property Trust, assigned the '309 Patent to S/A.

25. A true and correct copy of the '309 Patent is attached to this Complaint as Exhibit A.

**Count One**  
**(Patent Infringement—Accell)**

26. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

27. At a minimum, Accell will become aware of the ‘309 Patent at the time it is served with process in this case.

28. Accell knowingly has induced and specifically has intended its customers to infringe one or more claims of the ‘309 Patent by using Accell’s products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

29. Notwithstanding its knowledge of the ‘309 Patent, Accell will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

30. On one or more occasions prior to the filing of this action, Accell also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various products, including its UltraVideo® USB 2.0 to DVI-I or VGA Video Adapter (SKU J130B-001B) and its UltraAV® USB 2.0 to HDMI Adapter (SKU J131B-001B).

31. As a direct and proximate result of Accell’s infringement of the ‘309 Patent, S/A has been damaged and S/A is entitled to recover a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because Accell’s infringement of the ‘309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys’ fees pursuant to 35 U.S.C. §285.

**Count Two**  
**(Patent Infringement— DMI)**

32. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

33. At a minimum, DMI will become aware of the ‘309 Patent at the time it is served with process in this case.

34. DMI knowingly has induced and specifically has intended its customers to infringe one or more claims of the ‘309 Patent by using DMI’s products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

35. Notwithstanding its knowledge of the ‘309 Patent, DMI will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

36. DMI also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various products, including its Diamond DV100PC-TO-TV USB 3.0/2.0 to DVI/HDMI, Diamond Multimedia WPCTVPRO VStream Wireless USB PC to TV, Diamond Multimedia WPCTV-1080P VStream Wireless USB PC to TV, Diamond Multimedia WPCTV1080H VStream Wireless USB PC to TV, Diamond USB to HDMI PC to TV AV Video Graphics Adapter (BVU1000), and Diamond BVU195 USB External Video Display Adapter.

37. As a direct and proximate result of DMI’s infringement of the ‘309 Patent, S/A has been damaged and S/A is entitled to recover a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because DMI’s infringement of the ‘309 Patent was willful, S/A is entitled to an

award of increased damages under 35 U.S.C. §284, together with its attorneys' fees pursuant to 35 U.S.C. §285.

**Count Three**  
**(Patent Infringement—HP)**

38. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

39. At a minimum, HP will become aware of the '309 Patent at the time it is served with process in this case.

40. HP knowingly has induced and specifically has intended its customers to infringe one or more claims of the '309 Patent by using HP's products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

41. Notwithstanding its knowledge of the '309 Patent, HP will continue to induce its customers to infringe one or more claims of the '309 Patent in violation of 35 U.S.C. §271(b).

42. HP also directly has infringed one or more methods claimed in the '309 Patent in connection with its testing of one or more of its various products, including its HP USB Graphics Adapter (NL571AA) and its HP USB 3.0 Port Replicator.

43. As a direct and proximate result of HP's infringement of the '309 Patent, S/A has been damaged and S/A is entitled to recover a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because HP's infringement of the '309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys' fees pursuant to 35 U.S.C. §285.

**Count Four**  
**(Patent Infringement—IOGear)**

44. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

45. At a minimum, IOGear will become aware of the ‘309 Patent at the time it is served with process in this case.

46. IOGear knowingly has induced and specifically has intended its customers to infringe one or more claims of the ‘309 Patent by using IOGear’s products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

47. Notwithstanding its knowledge of the ‘309 Patent, IOGear will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

48. IOGear also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various products, including its Wireless USB to VGA Adapter Kit (GUW2015VKIT), Wireless 1080p Computer to HDTV Kit, HDMI Output (GUWAVKIT3), USB 2.0 to HDMI OR DVI External Video Card (KIT) (GU2025HD), USB 2.0 to HDMI External Video Card (GUC2025H), USB 2.0 to HDMI Adapter Multi-Language Version (GUC2025HW6), USB 2.0 External VGA Video Card Multi-Language Version (GUC2015VW6), USB 2.0 External Video Card (GUC2015V), and USB 2.0 External DVI Video Card (GUC2020DW6).

49. As a direct and proximate result of IOGear’s infringement of the ‘309 Patent, S/A has been damaged and S/A is entitled to recover a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because IOGear’s infringement of the ‘309 Patent was willful, S/A is entitled to an

award of increased damages under 35 U.S.C. §284, together with its attorneys' fees pursuant to 35 U.S.C. §285.

**Count Five**  
**(Patent Infringement—ACCO)**

50. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

51. At a minimum, ACCO will become aware of the '309 Patent at the time it is served with process in this case.

52. ACCO knowingly has induced and specifically has intended its customers to infringe one or more claims of the '309 Patent by using ACCO's products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

53. Notwithstanding its knowledge of the '309 Patent, ACCO will continue to induce its customers to infringe one or more claims of the '309 Patent in violation of 35 U.S.C. §271(b).

54. ACCO also directly has infringed one or more methods claimed in the '309 Patent in connection with its testing of one or more of its various products, including its Kensington Universal Multi-Display Adapter (K33928US).

55. As a direct and proximate result of ACCO's infringement of the '309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because ACCO's infringement of the '309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys' fees pursuant to 35 U.S.C. §285.

**Count Six**  
**(Patent Infringement—Lenovo)**

56. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

57. At a minimum, Lenovo will become aware of the ‘309 Patent at the time it is served with process in this case.

58. Lenovo knowingly has induced and specifically has intended its customers to infringe one or more claims of the ‘309 Patent by using Lenovo’s products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

59. Notwithstanding its knowledge of the ‘309 Patent, Lenovo will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

60. Lenovo also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various products, including its ThinkPad Mini Dock Plus Series 3 with USB 3.0 (433835U), ThinkPad Mini Dock Plus Series 3 with USB 3.0 – 90W (433815U), ThinkPad Mini Dock Plus Series 3 with USB 3.0 – 90W (433715U), ThinkPad Port Replicator Series 3 with USB 3.0 (433615W), USB 3.0 to DVI/VGA Monitor Adapter (0B047072), and USB to DVI Monitor Adapter (45K5296).

61. As a direct and proximate result of Lenovo’s infringement of the ‘309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because Lenovo’s infringement of the ‘309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys’ fees pursuant to 35 U.S.C. §285.

**Count Seven**  
**(Patent Infringement—Plugable)**

62. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

63. At a minimum, Plugable will become aware of the ‘309 Patent at the time it is served with process in this case.

64. Plugable knowingly has induced and specifically has intended its customers to infringe one or more claims of the ‘309 Patent by using Plugable’s products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

65. Notwithstanding its knowledge of the ‘309 Patent, Plugable will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

66. Plugable also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various products, including its UD-3000 USB 3.0 Docking Station for Windows PCs, UD-160-A USB 2.0 Universal Laptop Docking Station, USB3–HDMI-DVI USB 3.0 to HDMI/DVI Adapter for Windows, USB3-VGA USB 3.0 to VGA Adapter for Windows, USB 3.0 UGA Multi-Display Adapter with DVI/VGA/HDMI Support, UGA-2K-A USB 2.0 to VGA/DVI/HDMI Adapter for Multiple Monitors, UGA-165 USB 2.0 to VGA/DVI/HDMI Adapter for Multiple Monitors, and USB – VGA – 165 USB to VGA Adapter for Multiple Displays.

67. As a direct and proximate result of Plugable’s infringement of the ‘309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35



U.S.C. §284. Moreover, because Plugable's infringement of the '309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys' fees pursuant to 35 U.S.C. §285.

**Count Eight**  
**(Patent Infringement—Sewell)**

68. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

69. At a minimum, Sewell will become aware of the '309 Patent at the time it is served with process in this case.

70. Sewell knowingly has induced and specifically has intended its customers to infringe one or more claims of the '309 Patent by using Sewell's products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

71. Notwithstanding its knowledge of the '309 Patent, Sewell will continue to induce its customers to infringe one or more claims of the '309 Patent in violation of 35 U.S.C. §271(b).

72. Sewell also directly has infringed one or more methods claimed in the '309 Patent in connection with its testing of one or more of its various products, including its Minidek USB to DVI, VGA and HDMI Display Adapter (SW-22857).

73. As a direct and proximate result of Sewell's infringement of the '309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because Sewell's infringement of the '309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys' fees pursuant to 35 U.S.C. §285.

**Count Nine**  
**(Patent Infringement—Siig)**

74. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

75. At a minimum, Siig will become aware of the ‘309 Patent at the time it is served with process in this case.

76. Siig knowingly has induced and specifically has intended its customers to infringe one or more claims of the ‘309 Patent by using Siig’s products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

77. Notwithstanding its knowledge of the ‘309 Patent, Siig will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

78. Siig also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various products, including its USB 3.0 to HDMI with Audio (CE-H20W12-S1), USB 2.0 to DVI/VGA (JU-DV0012-S2), USB 2.0 to VGA (JU-000071-S1), USB 2.0 2-Port Hub (JU-H20011-S1), USB 2.0 to DVI/VGA Pro (JU-DV0112-S1), USB 2.0 to HDMI with Audio (JU-HM0112-S1), USB 2.0 to VGA Pro (JU-VG0012-S1), USB 3.0 to DisplayPort Adapter (JU-DP0011-S1), USB 3.0 to DVI/VGA Pro (JU-DV0311-S1), USB 3.0 to HDMI/DVI Dual Head Display Adapter (JU-H20211-S1), USB 3.0 to VGA Pro (JU-VG0311-S1), and Wireless USB to HDMI with Audio Kit (JU-HM0211-S1).

79. As a direct and proximate result of Siig’s infringement of the ‘309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because Siig’s infringement of the ‘309 Patent was willful, S/A is entitled to an

award of increased damages under 35 U.S.C. §284, together with its attorneys' fees pursuant to 35 U.S.C. §285.

**Count Ten**  
**(Patent Infringement—StarTech)**

80. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

81. At a minimum, StarTech will become aware of the '309 Patent at the time it is served with process in this case.

82. StarTech knowingly has induced and specifically has intended its customers to infringe one or more claims of the '309 Patent by using StarTech's products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

83. Notwithstanding its knowledge of the '309 Patent, StarTech will continue to induce its customers to infringe one or more claims of the '309 Patent in violation of 35 U.S.C. §271(b).

84. StarTech also directly has infringed one or more methods claimed in the '309 Patent in connection with its testing of one or more of its various products, including its USB 3.0 to HDMI/DVI External Video Card Multi Monitor Adapter (USB32HDE), USB to VGA External Video Card Multi Monitor Adapter (USB2VGAE3), USB to DVI External Video Card Multi Monitor Adapter (USB2DVIE3), USB to VGA Multi Monitor External /video Adapter (USBVGAE2), USB to DVI External /Dual or Multi Monitor Video Adapter (USB2DVIE2), USB 3.0 to HDMI and DVI Dual Monitor External Video Card (USB32HDDVII), USB 3.0 to DVI/VGA External Video Card Multi Monitor Adapter (USB32DVIPRO), USB 3.0 to DisplayPort External Video Card Multi Monitor Adapter (USB32DPPRO), Professional USB to

VGA External Dual or Multi Monitor Video Adapter (USB2VGAPRO), 6 ft. USB VGA Adapter Cable – External Multi Monitor Video M/M (USB2VGAMM6), USB to VGA Adapter – External USB Video Graphics Card for PC and MAC (USB2VGAPRO2), USB to HDMI External Dual or Multi Monitor Video Adapter with Audio (USB2HDMI), Professional USB to DVI External Dual or Multi Monitor Video Adapter (USB2DVIPRO), USB to DVI Adapter – External USB Video Graphics Card for PC and MAC (USB2DVIPRO2), 6 ft. USB DVI External Multi Monitor Video Adapter Cable – M/M (USB2DVIMM6), and USB DVI External Dual or Multi Monitor Video Adapter (USB2DVI).

85. As a direct and proximate result of StarTech's infringement of the '309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because StarTech's infringement of the '309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys' fees pursuant to 35 U.S.C. §285.

**Count Eleven**  
**(Patent Infringement—Targus)**

86. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

87. At a minimum, Targus will become aware of the '309 Patent at the time it is served with process in this case.

88. Targus knowingly has induced and specifically has intended its customers to infringe one or more claims of the '309 Patent by using Targus's products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

89. Notwithstanding its knowledge of the ‘309 Patent, Targus will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

90. Targus also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various products, including its 3.0 SuperSpeed Dual Video Adapter (ACA039US) and its USB 2.0 Docking Station (ACP51USZ).

91. As a direct and proximate result of Targus’s infringement of the ‘309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because Targus’s infringement of the ‘309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys’ fees pursuant to 35 U.S.C. §285.

**Count Twelve**  
**(Patent Infringement—Tripp Lite)**

92. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

93. At a minimum, Tripp Lite will become aware of the ‘309 Patent at the time it is served with process in this case.

94. Tripp Lite knowingly has induced and specifically has intended its customers to infringe one or more claims of the ‘309 Patent by using Tripp Lite’s products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

95. Notwithstanding its knowledge of the ‘309 Patent, Tripp Lite will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

96. Tripp Lite also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various products, including its USB to VGA/DVI Adapter (U244-001-R), USB to VGA Adapter (U244-001-VGA-R), USB to HDMI Adapter (U244-001-HDMI-R), and its USB 3.0 to DVI or VGA Adapter (U344-001-R).

97. As a direct and proximate result of Tripp Lite’s infringement of the ‘309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because Tripp Lite’s infringement of the ‘309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys’ fees pursuant to 35 U.S.C. §285.

**Count Thirteen**  
**(Patent Infringement—Trippe Manufacturing)**

98. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

99. At a minimum, Trippe Manufacturing will become aware of the ‘309 Patent at the time it is served with process in this case.

100. Trippe Manufacturing knowingly has induced and specifically has intended its customers to infringe one or more claims of the ‘309 Patent by using Trippe Manufacturing’s products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

101. Notwithstanding its knowledge of the ‘309 Patent, Trippe Manufacturing will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

102. Trippe Manufacturing also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various products, including its

USB to VGA/DVI Adapter (U244-001-R), USB to VGA Adapter (U244-001-VGA-R), USB to HDMI Adapter (U244-001-HDMI-R), and its USB 3.0 to DVI or VGA Adapter (U344-001-R).

103. As a direct and proximate result of Tripp Lite's infringement of the '309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because Tripp Lite's infringement of the '309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys' fees pursuant to 35 U.S.C. §285.

**Count Fourteen**  
**(Patent Infringement—DisplayLink)**

104. S/A incorporates the allegations of paragraphs 1 through 25 above, as if fully reproduced herein.

105. DisplayLink is a sophisticated developer of semiconductors and software for enabling and facilitating communication between computers and multiple displays. DisplayLink owns a portfolio of patents that are directed to these types of technology.

106. DisplayLink retains and relies on sophisticated patent counsel to prosecute its applications for patents in connection with its various technologies. In connection with their prosecution of DisplayLink's applications for patents, DisplayLink's patent counsel routinely searches prior art to determine whether and to what extent there may be other patents, publications, or technologies that might be material to the USPTO's determination of whether DisplayLink's inventions are entitled to patent protection.

107. In connection with one or more of their prior art searches, DisplayLink's patent counsel must have discovered the '309 Patent and must have disclosed it to DisplayLink.

108. Prior to the filing of this lawsuit, DisplayLink either had knowledge of the '309 Patent or took steps to remain willfully ignorant of the '309 Patent.

109. At a minimum, DisplayLink will become aware of the ‘309 Patent at the time it is served with process in this case.

110. DisplayLink licenses its technology to other parties for use in connection with their products and devices, such as USB graphics adapters, universal docking stations, and monitors. The other Defendants in this case are such licensees.

111. DisplayLink and its licensees, including the other Defendants in this case, knowingly have induced and specifically have intended customers to infringe one or more claims of the ‘309 Patent by using the licenses’ products and the DisplayLink Technology to practice methods of multi-screen display of computer images in violation of 35 U.S.C. §271(b).

112. Notwithstanding its knowledge of the ‘309 Patent, DisplayLink will continue to induce its customers to infringe one or more claims of the ‘309 Patent in violation of 35 U.S.C. §271(b).

113. DisplayLink also directly has infringed one or more methods claimed in the ‘309 Patent in connection with its testing of one or more of its various technologies.

114. As a direct and proximate result of DisplayLink’s infringement of the ‘309 Patent, S/A has been damaged and S/A is entitled to recover at least a reasonable royalty pursuant to 35 U.S.C. §284. Moreover, because DisplayLink’s infringement of the ‘309 Patent was willful, S/A is entitled to an award of increased damages under 35 U.S.C. §284, together with its attorneys’ fees pursuant to 35 U.S.C. §285.

## **V. JURY DEMAND**

115. S/A demands a trial by jury on all issues so triable.



## **VI. PRAYER**

WHEREFORE, Plaintiff S/A prays for the entry of judgment in its favor and against the Defendants, as follows:

(a) In connection with Count I, finding that Defendant, Accell, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for Accell's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(b) In connection with Count II, finding that Defendant, DMI, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for DMI's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(c) In connection with Count III, finding that Defendant, HP, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for HP's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(d) In connection with Count IV, finding that Defendant, IOGear, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for IOGear's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(e) In connection with Count V, finding that Defendant, ACCO, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for ACCO's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(f) In connection with Count VI, finding that Defendant, Lenovo, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for Lenovo's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(g) In connection with Count VII, finding that Defendant, Plugable, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for Plugable's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(h) In connection with Count VIII, finding that Defendant, Sewell, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for Sewell's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(i) In connection with Count IX, finding that Defendant, Siig, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for Siig's infringement, that S/A is entitled to

increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(j) In connection with Count X, finding that Defendant, StarTech, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for StarTech's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(k) In connection with Count XI, finding that Defendant, Targus, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for Targus's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(l) In connection with Count XII, finding that Defendant, Tripp Lite, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for Tripp Lite's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(m) In connection with Count XIII, finding that Defendant, Trippe Manufacturing, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for Trippe Manufacturing's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(n) In connection with Count XIV, finding that Defendant, DisplayLink, has either directly infringed or indirectly infringed the '309 Patent, that such infringement was willful, that S/A is entitled to damages of no less than a reasonable royalty for DisplayLink's infringement, that S/A is entitled to increased damages due to willful infringement, and that S/A is entitled to recover its costs and its attorneys' fees expended to prosecute its claims;

(o) In connection with all counts, permanently enjoining the Defendants from making, using, offering for sale, or selling, the accused products in the United States of America for the term of the '309 Patent;

(p) In connection with all counts, permanently enjoining the Defendants from inducing others to infringe the claims of the '309 Patent;

(q) In connection with all counts, awarding prejudgment interest and post-judgment interest at the lawful rates; and

(r) In connection with all counts, awarding all other relief to which S/A may be entitled.

Dated: April 22, 2013.

Respectfully submitted,

/s/ James E. Davis

James E. Davis

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