

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

SUPER INTERCONNECT  
TECHNOLOGIES LLC,

Plaintiff,

v.

ZTE CORPORATION AND ZTE USA,  
INC.,

Defendants.

Civil Action No. 6:13-cv-740

**JURY TRIAL DEMANDED**

**COMPLAINT**

1. Plaintiff Super Interconnect Technologies LLC (“Super Interconnect Technologies”), for its Complaint against defendants ZTE Corporation and ZTE USA, Inc. (collectively “ZTE” or “Defendants”), hereby alleges as follows:

**PARTIES**

2. Super Interconnect Technologies is a Texas company with its principal place of business in the Eastern District of Texas at 2400 Dallas Parkway, Suite 200, Plano, Texas 75093.

3. On information and belief, ZTE Corporation is a corporation organized under the laws of the People’s Republic of China, and has its principal place of business located at No. 55, Hi-Tech Road South, ShenZhen, P.R. China 518057, where it can be served with process in accordance with the terms of the Hague Convention.

4. On information and belief, ZTE USA, Inc. is a New Jersey corporation with its principal place of business at 2425 North Central Expressway, Suite 323, Richardson, Texas

75080. ZTE USA Inc.'s registered agent for service of process in Texas is Jing Li, 2425 North Central Expressway, Suite 323, Richardson, Texas 75080.

**NATURE OF THE ACTION**

5. This is a civil action for infringement of United States Patent No. 6,560,290 (the “290 patent”) under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*

**JURISDICTION AND VENUE**

6. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. On information and belief, each Defendant is subject to this Court’s specific and general personal jurisdiction pursuant to due process and the Texas Long Arm Statute, due at least to its substantial business in this forum, including: (A) at least part of its infringing activities alleged herein, and (B) regularly doing or soliciting business, engaging in other persistent causes of conduct, or deriving substantial revenue from goods and services provided to persons and other entities in Texas and this judicial district.

8. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b), (c) and (d) and § 1400(b). On information and belief, each Defendant has purposely transacted substantial business in this judicial district, and has committed acts of direct infringement in this judicial district.

**THE PATENT-IN-SUIT**

9. United States Patent No. 6,560,290, entitled “CMOS Driver and On-Chip Termination for Gigabaud Speed Data Communication,” was duly and legally issued by the United States Patent and Trademark Office on May 6, 2003. A copy of the ‘290 patent is attached hereto as Exhibit A.

10. Super Interconnect Technologies is the exclusive licensee of the '290 patent and has the right to sue and recover damages for any current or past infringement.

**COUNT I**

(INFRINGEMENT OF U.S. PATENT NO. 6,560,290)

11. Paragraphs 1 through 10 are incorporated by reference as if fully stated herein.

12. This cause of action arises under the patent laws of the United States, and in particular, 35 U.S.C. § 271 *et seq.*

13. ZTE has infringed, and continues to infringe, at least claim 9 of the '290 patent under 35 U.S.C. § 271, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling or importing into the United States mobile electronic products that include on-chip termination, for example and without limitation, ZTE Fury.

14. Super Interconnect Technologies has been and continues to be damaged by ZTE's infringement of the '290 patent.

**PRAYER FOR RELIEF**

Wherefore, Super Interconnect Technologies respectfully requests that this Court enter:

A. Judgment in favor of Super Interconnect Technologies that ZTE has infringed the '290 patent;

B. An order requiring ZTE to pay Super Interconnect Technologies damages adequate to compensate for ZTE's past infringement and any continuing or future infringement up until the date such judgment is entered, including pre- and post-judgment interest, costs and disbursements as justified under 35 U.S.C. § 284 and, if necessary to adequately compensate Super Interconnect Technologies for ZTE's infringement, an accounting;

C. A determination that this case is exceptional within the meaning of 35 U.S.C. § 285;

D. A preliminary and permanent injunction preventing ZTE, and those in active concert or participation with ZTE, from directly or indirectly infringing the '290 patent;

E. A judgment requiring that, in the event a permanent injunction preventing future acts of infringement is not granted, Super Interconnect Technologies be awarded a compulsory ongoing licensing fee; and

F. Any and all further relief which this Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Super Interconnect Technologies requests a trial by jury on all issues so triable by right pursuant to Fed. R. Civ. P. 38.

Dated: October 1, 2013

Respectfully submitted,

By: /s/ Craig Tadlock

Craig Tadlock

Texas State Bar No. 00791766

Keith Smiley

Texas State Bar No. 24067869

**TADLOCK LAW FIRM PLLC**

2701 Dallas Parkway, Suite 360

Plano, Texas 75093

Tel: (903) 730-6789

Email: [craig@tadlocklawfirm.com](mailto:craig@tadlocklawfirm.com)

Email: [keith@tadlocklawfirm.com](mailto:keith@tadlocklawfirm.com)

Paul J. Hayes

Robert R. Gilman

Christopher E. Millikin

Jonathan R. DeBlois

**HAYES MESSINA GILMAN & HAYES LLC**

250 Northern Ave., Suite 410

Boston, Massachusetts 02110

Tel: (978) 809-3850

Fax: (978) 809-3869

Email: [phayes@hayesmessina.com](mailto:phayes@hayesmessina.com)

Email: [rgilman@hayesmessina.com](mailto:rgilman@hayesmessina.com)

Email: [cmillikin@hayesmessina.com](mailto:cmillikin@hayesmessina.com)

Email: [jdeblois@hayesmessina.com](mailto:jdeblois@hayesmessina.com)

***ATTORNEYS FOR PLAINTIFF SUPER  
INTERCONNECT TECHNOLOGIES LLC***