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8 Attorney for Plaintiff

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 NEXUS DISPLAY TECHNOLOGIES
12 LLC.,

13 Plaintiff,

14 v.

15 HEWLETT-PACKARD COMPANY,

16 Defendants.

Case No. 2:15-cv-02402

**NEXUS DISPLAY TECHNOLOGIES
LLC'S COMPLAINT FOR PATENT
INFRINGEMENT**

1 Plaintiff Nexus Display Technologies LLC (“NDT” or “Plaintiff”) hereby submits this
2 Complaint against Hewlett-Packard Company (“HP” or “Defendants”) and states as follows:

3 **THE PARTIES**

4 1. NDT is a Texas limited liability company, having a principal place of business at
5 2400 Dallas Parkway, Suite 200, Plano, Texas 75093.

6 2. On information and belief, Defendant Hewlett-Packard Company is a corporation
7 organized and existing under the laws of the state of California, having a principal place of
8 business at 3000 Hanover Street, Palo Alto, California 94304.

9 **JURISDICTION AND VENUE**

10 3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and
11 1338(a) because this action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et*
12 *seq.*

13 4. Venue is proper in this federal district pursuant to 28 U.S.C. §§1391(b)–(c) and
14 1400(b) in that Defendants have done business in this District, have committed acts of
15 infringement in this District, and continue to commit acts of infringement in this District, entitling
16 NDT to relief.

17 **COUNT I: INFRINGEMENT OF U.S. PATENT NO. 7,295,578**

18 5. On November 13, 2007, the United States Patent and Trademark Office
19 (“USPTO”) duly and legally issued United States Patent No. 7,295,578 (“the ’578 Patent”),
20 entitled “Method And Apparatus For Synchronizing Auxiliary Data And Video Data Transmitted
21 Over A TMDS-Like Link.” NDT holds all rights, title, and interest in and to the ’578 Patent. HP
22 is not licensed to the ’578 Patent, yet HP knowingly, actively, and lucratively practices the
23 patents.
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1 6. Upon information and belief, HP has infringed directly and continues to infringe
2 directly the '578 Patent. The infringing acts include, but are not limited to, the manufacture, use,
3 sale, importation, and/or offer for sale of products and/or methods encompassed by the claims of
4 the '578 Patent. HP's infringing products include, but are not limited to, those which comply
5 with the DisplayPort standard including but not limited to the HP EliteBook Revolve, the HP t610
6 Flexible Thin Client, the HP EliteOne 800 G1 All-in-One PC, the HP Z1 G2 Workstation, the HP
7 ProOne 600 G1 All-in-One PC, the HP ProOne 400 G1 Business PC, the HP Z1 Workstation, the
8 HP Z230 Tower, the HP ZBook 14 Mobile Workstation, the HP Chromebox, the HP Compaq Pro
9 6305 Small Form Factor PC, the HP EliteBook Folio, the HP EliteBook 850 Notebook PC, the
10 HP Spectre 13t-3000 Ultrabook the HP ENVY Phoenix h9-1355 Desktop PC, the HP ENVY 27
11 27-inch Diagonal IPS LED Backlit Monitor, the HP Z Display Z22i 21.5-inch IPS LED Backlit
12 Monitor, the HP DreamColor LP2480zx Professional Monitor, the HP Compaq LA2206x 21.5-
13 inch WLED Backlit LCD Monitor, the HP ZR2330w 23-inch IPS LED Backlit Monitor, the HP
14 LD4220tm 42-inch LCD Interactive Digital Signage Display, the HP 2310ei series LCD flat
15 panel monitor, Elitebook Folio 9470m Notebook Computers, EliteBook Revolve 810 G2
16 Notebook Computers, EliteDesk 400 G1 Thin Client, EliteDesk 700 G1 MT Thin Client,
17 EliteDesk 705 G1Thin Client, EliteDesk 705 G1 Thin Client, EliteDesk 800 G1 DM Business PC
18 Desktop Computers, EliteOne 805 G1Desktop Computers, Envy Series 14 Spectre 15 and 17-inch
19 Notebook Computers, Folio 9480m Notebook Computers, HP Compaq Elite 6300 Series Desktop
20 Computers, HP Compaq Elite 8300 AIO (with AMD GPU) Desktop Computers, HP Compaq
21 Elite 8300 AIO (with Intel GPU)Desktop Computers, HP Compaq Elite 8300 AIO (with Nvidia
22 GPU) Desktop Computers, HP Compaq Pro 6300 AIO (with AMD GPU) Desktop Computers,
23 HP Compaq Pro 6300 AIO (with Intel GPU) Desktop Computers, HP Compaq Pro 6300 AIO
24 (with Nvidia GPU)Desktop Computers, HP Compaq Pro 6305 SFF Desktop Computers, HP
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1 EliteBook 820 G1 Notebook Computers, HP EliteBook 820 G2 Notebook Computers, HP
2 EliteBook 850 G2 Notebook Computers, HP EliteBook Folio 1040 G2 Notebook Computers, HP
3 EliteDesk 700 G1 MT Thin Client, HP EliteDesk 800 G1 Series Business Desktops Desktop
4 Computers, HP EliteOne 800 G1 All-in-One Business PC Desktop Computers, HP Omen
5 Notebook Computers, HP Pro x2 612 G1 Tablet, HP Pro x2 612 G1 Tablet with Power
6 Keyboard Tablet, HP ProDesk 400 G2 MT Thin Client, HP ProOne 600 G1 All-in-One
7 Business PC Desktop Computers, HP rp5800 Retail System Desktop Computers, HP t610 Thin
8 Client, HP t620/t620 PLUS Desktop Computers, ZBook 14 Notebook Computers, ZBook 15
9 Notebook Computers, Zbook 15 Workstation Notebook Computers, ZBook 17 Notebook
10 Computers, ProBook 645 Notebook Computers, ProBook 6470b, 6475b, 6570b Notebook
11 Computers, ProDesk 405 Thin Client, ProDesk 600 G1 Desktop Computers, ProOne 400
12 G1 Desktop Computers, Radeon HD 8490 Graphics Cards, Revolve Notebook Computers,
13 Revolve 810 G3 Notebook Computers, Spectre 13 Notebook Computers, Z220 CMT/SFF
14 Desktop Computers, Z230 (HD4600) Desktop Computers, Z23i DP Displays, Z24i DP Displays,
15 Z24x DP Displays, Z27i DP Displays, Z27xi DP Displays, Z34c DP Displays, HP Envy 32DP
16 Displays, L6017tm DP Displays, LA1956x DP Displays, LA2006x DP Displays, LA2205wg DP
17 Displays, LA2206x DP Displays, LA2306x DP Displays, LD 4235 DP Displays, LP2480zx DP
18 Displays, P202VA DP Displays, P222 DP Displays, P222va DP Displays, x2401 DP Displays,
19 S230tm DP Displays, E231 DP Displays, and the HP T520 Printer.

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23 7. The acts of infringement by HP have caused damage to NDT, and NDT is entitled
24 to recover from HP the damages sustained by NDT as a result of HP's wrongful acts in an amount
25 subject to proof at trial. The infringement of NDT's exclusive rights under the '578 Patent by HP
26 has damaged and will continue to damage NDT, causing irreparable harm, for which there is no
27 adequate remedy at law, unless enjoined by this Court.
28

1 8. At least as early as January 9, 2008, HP has had knowledge of the '578 Patent. On
2 January 9, 2008, the '578 Patent was cited by the USPTO as a reference during the prosecution of
3 U.S. Patent No. 7,599,458 ("the '458 Patent"), which is assigned to Hewlett-Packard
4 Development Company, L.P., a division of HP. On information and belief, based on HP's
5 sophistication and experience with the United States patent system and HP's responsive papers to
6 the USPTO during the prosecution of the '458 Patent, HP has performed an analysis of the '578
7 Patent. On information and belief, due to this analysis of the '578 Patent, HP knew, should have
8 known, or was willfully blind to the fact that its making, using, licensing, selling, offering for
9 sale, and/or importing of HP's infringing products posed, at the very least, an objectively high
10 likelihood of infringing the '578 Patent. As a result, HP's infringement of the '578 Patent has
11 been willful and NDT is entitled to increased damages under 35 U.S.C. § 284 and to attorneys'
12 fees and costs incurred in prosecuting this action under 35 U.S.C. § 285. Additionally, at least as
13 early as its receipt of this Complaint, HP has had knowledge of the '578 Patent and written notice
14 of the infringement.
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17 **COUNT II: INFRINGEMENT OF U.S. PATENT NO. 7,143,328**

18 9. On November 28, 2006, the United States Patent and Trademark Office
19 ("USPTO") duly and legally issued United States Patent No. 7,143,328 ("the '328 Patent"),
20 entitled "Auxiliary Data Transmitted Within A Display's Serialized Data Stream." NDT holds all
21 rights, title, and interest in and to the '328 Patent. HP is not licensed to the '328 Patent, yet HP
22 knowingly, actively, and lucratively practices the patents.
23

24 10. Upon information and belief, HP has infringed directly and continues to infringe
25 directly the '328 Patent. The infringing acts include, but are not limited to, the manufacture, use,
26 sale, importation, and/or offer for sale of products and/or methods encompassed by the claims of
27 the '328 Patent. HP's infringing products include, but are not limited to, at least those which
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1 comply with the DisplayPort standard including but not limited to the HP EliteBook Revolve, the
2 HP t610 Flexible Thin Client, the HP EliteOne 800 G1 All-in-One PC, the HP Z1 G2
3 Workstation, the HP ProOne 600 G1 All-in-One PC, the HP ProOne 400 G1 Business PC, the HP
4 Z1 Workstation, the HP Z230 Tower, the HP ZBook 14 Mobile Workstation, the HP Chromebox,
5 the HP Compaq Pro 6305 Small Form Factor PC, the HP EliteBook Folio, the HP EliteBook 850
6 Notebook PC, the HP Spectre 13t-3000 Ultrabook the HP ENVY Phoenix h9-1355 Desktop PC,
7 the HP ENVY 27 27-inch Diagonal IPS LED Backlit Monitor, the HP Z Display Z22i 21.5-inch
8 IPS LED Backlit Monitor, the HP DreamColor LP2480zx Professional Monitor, the HP Compaq
9 LA2206x 21.5-inch WLED Backlit LCD Monitor, the HP ZR2330w 23-inch IPS LED Backlit
10 Monitor, the HP LD4220tm 42-inch LCD Interactive Digital Signage Display, the HP 2310ei
11 series LCD flat panel monitor, Elitebook Folio 9470m Notebook Computers, EliteBook Revolve
12 810 G2 Notebook Computers, EliteDesk 400 G1 Thin Client, EliteDesk 700 G1 MT Thin Client,
13 EliteDesk 705 G1Thin Client, EliteDesk 705 G1 Thin Client, EliteDesk 800 G1 DM Business PC
14 Desktop Computers, EliteOne 805 G1Desktop Computers, Envy Series 14 Spectre 15 and 17-inch
15 Notebook Computers, Folio 9480m Notebook Computers, HP Compaq Elite 6300 Series Desktop
16 Computers, HP Compaq Elite 8300 AIO (with AMD GPU) Desktop Computers, HP Compaq
17 Elite 8300 AIO (with Intel GPU) Desktop Computers, HP Compaq Elite 8300 AIO (with Nvidia
18 GPU) Desktop Computers, HP Compaq Pro 6300 AIO (with AMD GPU) Desktop Computers,
19 HP Compaq Pro 6300 AIO (with Intel GPU) Desktop Computers, HP Compaq Pro 6300 AIO
20 (with Nvidia GPU)Desktop Computers, HP Compaq Pro 6305 SFF Desktop Computers, HP
21 EliteBook 820 G1 Notebook Computers, HP EliteBook 820 G2 Notebook Computers, HP
22 EliteBook 850 G2Notebook Computers, HP EliteBook Folio 1040 G2 Notebook Computers, HP
23 EliteDesk 700 G1 MT Thin Client, HP EliteDesk 800 G1Series Business Desktops Desktop
24 Computers, HP EliteOne 800 G1 All-in-One Business PC Desktop Computers, HP Omen
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1 Notebook Computers, HP Pro x2 612 G1 Tablet, HP Pro x2 612 G1 Tablet with Power
2 KeyboardTablet, HP ProDesk 400 G2 MT Thin Client, HP ProOne 600 G1 All-in-One
3 Business PC Desktop Computers, HP rp5800 Retail System Desktop Computers, HP t610 Thin
4 Client, HP t620/t620 PLUSDesktop Computers, ZBook 14 Notebook Computers, ZBook 15
5 Notebook Computers, Zbook 15 Workstation Notebook Computers, ZBook 17 Notebook
6 Computers, ProBook 645Notebook Computers, ProBook 6470b, 6475b, 6570b Notebook
7 Computers, Prodesk 405 Thin Client, ProDesk 600 G1 Desktop Computers, ProOne 400
8 G1Desktop Computers, Radeon HD 8490 Graphics Cards, Revolve Notebook Computers,
9 Revolve 810 G3 Notebook Computers, Spectre 13 Notebook Computers, Z220 CMT/SFF
10 Desktop Computers, Z230 (HD4600) Desktop Computers, Z23i DP Displays, Z24i DP Displays,
11 Z24x DP Displays, Z27i DP Displays, Z27xiDP Displays, Z34c DP Displays, HP Envy 32DP
12 Displays, L6017tm DP Displays, LA1956x DP Displays, LA2006x DP Displays, LA2205wg
13 DP Displays, LA2206x DP Displays, LA2306x DP Displays, LD 4235DP Displays, LP2480zx
14 DP Displays, P202VA DP Displays, P222 DP Displays, P222va DP Displays, x2401 DP
15 Displays, S230tm DP Displays, E231 DP Displays, and the HP T520 Printer.

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17
18 11. The acts of infringement by HP have caused damage to NDT, and NDT is entitled
19 to recover from HP the damages sustained by NDT as a result of HP's wrongful acts in an amount
20 subject to proof at trial. The infringement of NDT's exclusive rights under the '328 Patent by HP
21 has damaged and will continue to damage NDT, causing irreparable harm, for which there is no
22 adequate remedy at law, unless enjoined by this Court.

23
24 12. At least as early as its receipt of this Complaint, HP has had knowledge of the '328
25 Patent and written notice of the infringement. NDT intends to seek discovery on the issue of
26 willfulness and reserves the right to seek a willfulness finding and increased damages under 35
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1 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C.
2 § 285.

3 **COUNT III: INFRINGEMENT OF U.S. PATENT NO. 5,835,498**

4 13. On November 10, 1998, the United States Patent and Trademark Office
5 ("USPTO") duly and legally issued United States Patent No. 5,835,498 ("the '498 Patent"),
6 entitled "System and Method For Sending Multiple Data Signals Over a Serial Link." NDT holds
7 all rights, title, and interest in and to the '498 Patent. HP is not licensed to the '498 Patent, yet
8 HP knowingly, actively, and lucratively practices the patents.

9 14. Upon information and belief, HP has infringed directly and continues to infringe
10 directly the '498 Patent. The infringing acts include, but are not limited to, the manufacture, use,
11 sale, importation, and/or offer for sale of products and/or methods encompassed by the claims of
12 the '498 Patent. HP's infringing products include, but are not limited to, at least those which
13 comply with the DisplayPort standard including but not limited to the HP EliteBook Revolve, the
14 HP t610 Flexible Thin Client, the HP EliteOne 800 G1 All-in-One PC, the HP Z1 G2
15 Workstation, the HP ProOne 600 G1 All-in-One PC, the HP ProOne 400 G1 Business PC, the HP
16 Z1 Workstation, the HP Z230 Tower, the HP ZBook 14 Mobile Workstation, the HP Chromebox,
17 the HP Compaq Pro 6305 Small Form Factor PC, the HP EliteBook Folio, the HP EliteBook 850
18 Notebook PC, the HP Spectre 13t-3000 Ultrabook the HP ENVY Phoenix h9-1355 Desktop PC,
19 the HP ENVY 27 27-inch Diagonal IPS LED Backlit Monitor, the HP Z Display Z22i 21.5-inch
20 IPS LED Backlit Monitor, the HP DreamColor LP2480zx Professional Monitor, the HP Compaq
21 LA2206x 21.5-inch WLED Backlit LCD Monitor, the HP ZR2330w 23-inch IPS LED Backlit
22 Monitor, the HP LD4220tm 42-inch LCD Interactive Digital Signage Display, the HP 2310ei
23 series LCD flat panel monitor, Elitebook Folio 9470m Notebook Computers, EliteBook Revolve
24 810 G2 Notebook Computers, EliteDesk 400 G1 Thin Client, EliteDesk 700 G1 MT Thin Client,
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1 EliteDesk 705 G1Thin Client, EliteDesk 705 G1 Thin Client, EliteDesk 800 G1 DM Business PC
2 Desktop Computers, EliteOne 805 G1Desktop Computers, Envy Series 14 Spectre 15 and 17-inch
3 Notebook Computers, Folio 9480m Notebook Computers, HP Compaq Elite 6300 Series Desktop
4 Computers, HP Compaq Elite 8300 AIO (with AMD GPU) Desktop Computers, HP Compaq
5 Elite 8300 AIO (with Intel GPU)Desktop Computers, HP Compaq Elite 8300 AIO (with Nvidia
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7 HP Compaq Pro 6300 AIO (with Intel GPU) Desktop Computers, HP Compaq Pro 6300 AIO
8 (with Nvidia GPU)Desktop Computers, HP Compaq Pro 6305 SFF Desktop Computers, HP
9 EliteBook 820 G1 Notebook Computers, HP EliteBook 820 G2 Notebook Computers, HP
10 EliteBook 850 G2Notebook Computers, HP EliteBook Folio 1040 G2 Notebook Computers, HP
11 EliteDesk 700 G1 MT Thin Client, HP EliteDesk 800 G1Series Business Desktops Desktop
12 Computers, HP EliteOne 800 G1 All-in-One Business PC Desktop Computers, HP Omen
13 Notebook Computers, HP Pro x2 612 G1 Tablet, HP Pro x2 612 G1 Tablet with Power
14 KeyboardTablet, HP ProDesk 400 G2 MT Thin Client, HP ProOne 600 G1 All-in-One
15 Business PC Desktop Computers, HP rp5800 Retail System Desktop Computers, HP t610 Thin
16 Client, HP t620/t620 PLUSDesktop Computers, ZBook 14 Notebook Computers, ZBook 15
17 Notebook Computers, Zbook 15 Workstation Notebook Computers, ZBook 17 Notebook
18 Computers, ProBook 645Notebook Computers, ProBook 6470b, 6475b, 6570b Notebook
19 Computers, Prodesk 405 Thin Client, ProDesk 600 G1 Desktop Computers, ProOne 400
20 G1Desktop Computers, Radeon HD 8490 Graphics Cards, Revolve Notebook Computers,
21 Revolve 810 G3 Notebook Computers, Spectre 13 Notebook Computers, Z220 CMT/SFF
22 Desktop Computers, Z230 (HD4600) Desktop Computers, Z23i DP Displays, Z24i DP Displays,
23 Z24x DP Displays, Z27i DP Displays, Z27xiDP Displays, Z34c DP Displays, HP Envy 32DP
24 Displays, L6017tm DP Displays, LA1956x DP Displays, LA2006x DP Displays, LA2205wg
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1 DP Displays, LA2206x DP Displays, LA2306x DP Displays, LD 4235DP Displays, LP2480zx
2 DP Displays, P202VA DP Displays, P222 DP Displays, P222va DP Displays, x2401 DP
3 Displays, S230tm DP Displays, E231 DP Displays, and the HP T520 Printer.

4
5 15. The acts of infringement by HP have caused damage to NDT, and NDT is entitled
6 to recover from HP the damages sustained by NDT as a result of HP's wrongful acts in an amount
7 subject to proof at trial. The infringement of NDT's exclusive rights under the '498 Patent by HP
8 has damaged and will continue to damage NDT, causing irreparable harm, for which there is no
9 adequate remedy at law, unless enjoined by this Court.

10 16. At least as early as June 2003, HP has had knowledge of the '498 Patent. On
11 information and belief, in June 2003 the '498 Patent was cited by the USPTO as a reference
12 during the prosecution of U.S. Patent No. 6,690,757 ("the '757 Patent"), which is assigned to
13 Hewlett-Packard Development Company, L.P, a division of Hewlett-Packard Company. On
14 information and belief, based on HP's sophistication and experience with the United States patent
15 system and HP's responsive papers to the USPTO during the prosecution of the '757 Patent, HP
16 has performed an analysis of the '498 Patent. On information and belief, due to this analysis of
17 the '498 Patent, HP knew, should have known, or was willfully blind to the fact that its making,
18 using, licensing, selling, offering for sale, and/or importing of HP's infringing products posed, at
19 the very least, an objectively high likelihood of infringing the '498 Patent. In addition, on June 7,
20 2004, the '498 Patent was cited as a reference during the prosecution of U.S. Patent No.
21 7,010,607, which is assigned to Hewlett-Packard Development Company, L.P., a division of
22 Hewlett-Packard Company. On information and belief, based on HP's sophistication and
23 experience with the United States patent system and HP's responsive papers to the USPTO during
24 the prosecution of the '607 Patent, HP has performed an analysis of the '498 Patent. On
25 information and belief, due to this analysis of the '498 Patent, HP knew, should have known, or
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1 was willfully blind to the fact that its making, using, licensing, selling, offering for sale, and/or
2 importing of HP's infringing products posed, at the very least, an objectively high likelihood of
3 infringing the '498 Patent. As a result, HP's infringement of the '498 Patent has been willful and
4 NDT is entitled to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs
5 incurred in prosecuting this action under 35 U.S.C. § 285. Additionally, at least as early as its
6 receipt of this Complaint, HP has had knowledge of the '498 Patent and written notice of the
7 infringement.
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9 **COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 7,599,439**

10 17. On October 6, 2009, the United States Patent and Trademark Office ("USPTO")
11 duly and legally issued United States Patent No. 7,599,439 ("the '439 Patent"), entitled "Method
12 and System for Transmitting N-Bit Video Data Over a Serial Link." NDT holds all rights, title,
13 and interest in and to the '439 Patent. HP is not licensed to the '439 Patent, yet HP knowingly,
14 actively, and lucratively practices the patents.
15

16 18. Upon information and belief, HP has infringed directly and continues to infringe
17 directly the '439 Patent. The infringing acts include, but are not limited to, the manufacture, use,
18 sale, importation, and/or offer for sale of products and/or methods encompassed by the claims of
19 the '439 Patent. HP's infringing products include, but are not limited to, at least those which
20 comply with the DisplayPort standard including but not limited to the HP EliteBook Revolve, the
21 HP t610 Flexible Thin Client, the HP EliteOne 800 G1 All-in-One PC, the HP Z1 G2
22 Workstation, the HP ProOne 600 G1 All-in-One PC, the HP ProOne 400 G1 Business PC, the HP
23 Z1 Workstation, the HP Z230 Tower, the HP ZBook 14 Mobile Workstation, the HP Chromebox,
24 the HP Compaq Pro 6305 Small Form Factor PC, the HP EliteBook Folio, the HP EliteBook 850
25 Notebook PC, the HP Spectre 13t-3000 Ultrabook the HP ENVY Phoenix h9-1355 Desktop PC,
26 Elitebook Folio 9470m Notebook Computers, EliteBook Revolve 810 G2 Notebook Computers,
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1 EliteDesk 400 G1 Thin Client, EliteDesk 700 G1 MT Thin Client, EliteDesk 705 G1Thin Client,
2 EliteDesk 705 G1 Thin Client, EliteDesk 800 G1 DM Business PC Desktop Computers, EliteOne
3 805 G1Desktop Computers, Envy Series 14 Spectre 15 and 17-inch Notebook Computers, Folio
4 9480m Notebook Computers, HP Compaq Elite 6300 Series Desktop Computers, HP Compaq
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9 Computers, HP Compaq Pro 6305 SFF Desktop Computers, HP EliteBook 820 G1 Notebook
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11 Computers, HP EliteBook Folio 1040 G2 Notebook Computers, HP EliteDesk 700 G1 MT Thin
12 Client, HP EliteDesk 800 G1Series Business Desktops Desktop Computers, HP EliteOne 800 G1
13 All-in-One Business PC Desktop Computers, HP Omen Notebook Computers, HP Pro x2 612 G1
14 Tablet, HP Pro x2 612 G1 Tablet with Power KeyboardTablet, HP ProDesk 400 G2 MT Thin
15 Client, HP ProOne 600 G1 All-in-One Business PC Desktop Computers, HP rp5800 Retail
16 System Desktop Computers, HP t610 Thin Client, HP t620/t620 PLUSDesktop Computers,
17 ZBook 14 Notebook Computers, ZBook 15 Notebook Computers, Zbook 15 Workstation
18 Notebook Computers, ZBook 17 Notebook Computers, ProBook 645Notebook Computers,
19 ProBook 6470b, 6475b, 6570b Notebook Computers, Prodesk 405 Thin Client, ProDesk 600 G1
20 Desktop Computers, ProOne 400 G1Desktop Computers, Radeon HD 8490 Graphics Cards,
21 Revolve Notebook Computers, Revolve 810 G3 Notebook Computers, and Spectre 13 Notebook
22 Computers.
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26 19. The acts of infringement by HP have caused damage to NDT, and NDT is entitled
27 to recover from HP the damages sustained by NDT as a result of HP's wrongful acts in an amount
28

1 subject to proof at trial. The infringement of NDT's exclusive rights under the '439 Patent by HP
2 has damaged and will continue to damage NDT, causing irreparable harm, for which there is no
3 adequate remedy at law, unless enjoined by this Court.

4 20. At least as early as its receipt of this Complaint, HP has had knowledge of the '439
5 Patent and written notice of the infringement. NDT intends to seek discovery on the issue of
6 willfulness and reserves the right to seek a willfulness finding and increased damages under 35
7 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C.
8 § 285.
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10 **JURY DEMAND**

11 21. NDT hereby demands a trial by jury on all issues.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, NDT requests entry of judgment in its favor and against HP as follows:

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- 15 a. A declaration that HP has infringed and is infringing the '578, '328, '498, and '439
16 Patents;
 - 17 b. An Order permanently enjoining HP, its officers, agents, employees, and those acting
18 in privity with it, from further direct and/or indirect infringement of the '578, '328,
19 '498, and '439 Patents;
 - 20 c. An award of damages to NDT arising out of HP's infringement of the '578, '328,
21 '498, and '439 Patents, including enhanced damages pursuant to 35 U.S.C. § 284,
22 together with prejudgment and post-judgment interest, in an amount according to
23 proof;
 - 24 d. An award of attorneys' fees pursuant to 35 U.S.C. § 285 or as otherwise permitted by
25 law; and,
 - 26 e. Granting NDT its costs and further relief as the Court may deem just and proper.
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Dated: April 1, 2015

Respectfully submitted,

/s/ Alisa Lipski
Alisa A. Lipski
California Bar No. 278710
alipski@azalaw.com

AHMAD, ZAVITSANOS, ANAIPAKOS,
ALAVI & MENSING P.C.
1221 McKinney Street, Suite 3460
Houston, TX 77010
Telephone: 713-655-1101
Facsimile: 713-655-0062

**ATTORNEY FOR PLAINTIFF NEXUS
DISPLAY TECHNOLOGIES LLC**