

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

PROJECTED COMPUTING LLC	)	
	)	
Plaintiff,	)	
	)	Civil Action No. _____
v.	)	
	)	<b>JURY TRIAL DEMANDED</b>
FUJITSU AMERICA, INC.	)	
	)	
Defendant.	)	
_____	)	

**COMPLAINT**

For its Complaint, Plaintiff Projected Computing LLC ("Projected Computing"), by and through the undersigned counsel, alleges as follows:

**THE PARTIES**

1. Projected Computing LLC is a Texas limited liability company with a place of business located at 1400 Preston Road #400, Plano, Texas 75093.
2. Defendant Fujitsu America, Inc. is a California limited liability company with, upon information and belief, a place of business located at 2791 Telecom Parkway, ME2, Richardson, Texas 75082.
3. Upon information and belief, Defendant has registered with the Texas Secretary of State to conduct business in Texas.

**JURISDICTION AND VENUE**

4. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*
5. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.
6. Upon information and belief, Defendant conducts substantial business in this

forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in this district.

7. Venue is proper in this district pursuant to §§ 1391(b), (c) and 1400(b).

**THE PATENT-IN-SUIT**

8. On August 16, 2005, United States Patent No. 6,930,669 (the "'669 patent"), entitled "Portable Personal Computing Device with Fully Integrated Projection Display System," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '669 patent is attached hereto as Exhibit A.

9. Projected Computing is the assignee and owner of the right, title and interest in and to the '669 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

**COUNT I – INFRINGEMENT OF U.S. PATENT NO. 6,930,669**

10. Projected Computing repeats and realleges the allegations of paragraphs 1 through 9 as if fully set forth herein.

11. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of the '669 patent by making, using, importing, offering for sale, and/or selling an integrated display system for displaying observable information, including, but not limited to the Modular Bay Pico Projector, covered by one or more claims of the '669 patent.

12. Projected Computing is entitled to recover from Defendant the damages sustained by Projected Computing as a result of Defendant's infringement of the '669 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with

interest and costs as fixed by this Court under 35 U.S.C. § 284.

**JURY DEMAND**

Projected Computing hereby demands a trial by jury on all issues so triable.

**PRAYER FOR RELIEF**

WHEREFORE, Projected Computing requests that this Court enter judgment against Defendant as follows:

- A. An adjudication that Defendant has infringed the '669 patent;
- B. An award of damages to be paid by Defendant adequate to compensate Projected Computing for Defendant's infringement of the '669 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Projected Computing's reasonable attorneys' fees; and
- D. An award to Projected Computing of such further relief at law or in equity as the Court deems just and proper.

Dated: October 26, 2015

/s/Andrew W. Spangler  
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