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14 **UNITED STATES DISTRICT COURT**
 15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 Anza Technology, Inc.,
 17 Plaintiff,
 18 v.
 19 Phoebe Micro, Inc. dba Airlink 101,
 20 Defendant.

Case No. '16CV1262 LAB NLS
**COMPLAINT FOR PATENT
 INFRINGEMENT**
DEMAND FOR JURY TRIAL

21 Plaintiff Anza Technology, Inc. (“Anza” or “Plaintiff”), by and through its
 22 undersigned counsel, complains and alleges against Defendant Phoebe Micro, Inc.
 23 dba Airlink 101 (“Airlink” or “Defendant”) as follows:

24 **NATURE OF THE ACTION**

25 1. This is a civil action for infringement of a patent arising under the
 26 laws of the United States relating to patents, 35 U.S.C. § 101, *et seq.*, including,
 27 without limitation, 35 U.S.C. §§ 271, 281. Plaintiff Anza seeks a preliminary and
 28 permanent injunction and monetary damages for patent infringement.

JURISDICTION AND VENUE

1
2 2. This court has subject matter jurisdiction over this case for patent
3 infringement under 28 U.S.C. §§ 1331 and 1338(a) and pursuant to the patent laws
4 of the United States of America, 35 U.S.C. § 101, *et seq.*

5 3. Venue properly lies within the Southern District of California
6 pursuant to the provisions of 28 U.S.C. §§ 1391(b), (c), and (d) and 1400(b). On
7 information and belief, Defendant conducts substantial business directly and/or
8 through third parties or agents in this judicial district by selling and/or offering to
9 sell the infringing products and/or by conducting other business in this judicial
10 district. Furthermore, Plaintiff is informed and believes that Defendant engages in
11 business in this district, and that Plaintiff has been harmed by Defendant’s conduct,
12 business transactions and sales in this district.

13 4. This Court has personal jurisdiction over Defendant because, on
14 information and belief, Defendant is headquartered and maintains an office at
15 47606 Kato Road, Fremont, California and/or 45277 Fremont Blvd., Fremont,
16 California. Also, Plaintiff is informed and believes that Defendant transacts
17 continuous and systematic retail business within the State of California and the
18 Southern District of California. This Court has personal jurisdiction over the
19 Defendant because Plaintiff is informed and believes that this Defendant’s
20 infringing activities, including, without limitation, the making, using, selling
21 and/or offers for sale of infringing products occur in the State of California and the
22 Southern District of California. In particular, Defendant sells its infringing product
23 through online retail stores, such as aaawave.com, maxgroup.com, meritline.com,
24 and platinummicro.com all of which are principally located in California, including
25 Southern California, to customers in the Southern District. Finally, this Court has
26 personal jurisdiction over Defendant because, on information and belief, Defendant
27 has made, used, sold and/or offered for sale its infringing products and placed such
28 infringing products in the stream of interstate commerce with the expectation that

1 such infringing products would be made, used, sold and/or offered for sale within
2 the State of California and the Southern District of California.

3 5. Upon information and belief, certain of the products manufactured by
4 or for Defendant have been and/or are currently designed and/or offered for sale by
5 Defendant through an in-house sales and marketing team operating in California.

6 **PARTIES**

7 6. Plaintiff Anza is a corporation organized and existing under the laws
8 of the State of California with an office and principal place of business at 4121
9 Citrus Avenue, Suite 4, Rocklin, California 95677. Anza is a designer,
10 manufacturer and seller of bonding tools; ESD tools and other products directed to
11 the manufacture and assembly of electronics, in particular the bonding of
12 electrostatic-sensitive devices.

13 7. Upon information and belief, Airlink, is a corporation organized and
14 existing under the laws of the State of California, with a principal place of business
15 at 47606 Kato Road, Fremont, California.

16 **THE ACCUSED PRODUCTS**

17 8. The Defendant's accused products for purposes of the asserted patents
18 include but are not limited to its wireless electronics hardware products that utilize
19 integrated circuit chips that were manufactured and mounted on printed circuit
20 boards using a "flip chip" bonding process, sold under the "Airlink" or "Airlink
21 101" brands or as manufactured and sold under other brands (the "Accused
22 Products").

23 9. Plaintiff is informed and believes and thereupon alleges that
24 Defendant designs, manufactures and/or assembles or imports products that depend
25 on high density integrated circuit ("IC") chips that are manufactured and mounted
26 on printed circuit boards using a "flip chip" bonding process that require special
27 electrostatic discharge ("ESD") handling in the Accused Products' assembly
28 process.

1 16. Flip chip bonding in the manner described in claim 16 of the '927
2 patent has become the standard for mounting ESD-sensitive devices in order to
3 decrease parasitic resistance, inductance, and capacitance. The method of claim 16
4 of the '927 patent to reduce damage to ESD-sensitive devices is reflected in a
5 number of manufacturing standards, including, *e.g.*, the ANSI ESD S20.20
6 standard. By way of example, the ANSI standard specifies that current state of the
7 art manufacturing techniques involving ESD-sensitive devices require the use of
8 tools that utilize dissipative materials, *i.e.*, materials that ANSI defines as having a
9 resistance value between 1×10^4 and 1×10^{11} ohms surface or volume resistance.
10 Such specification from the standard is within the range set forth in the '927 patent.
11 Plaintiff believes and alleges that other applicable ESD standards require
12 substantially similar resistance values.

13 17. Plaintiff is informed and believes and thereon alleges that Defendant
14 manufactures and assembles the Accused Products, or contracts with others to
15 manufacture and assemble the Accused Products, in compliance with one or more
16 of these ESD standards.

17 18. In addition, Plaintiff is informed and believes and thereon alleges that
18 during manufacture and assembly of the Accused Products, Defendant and/or its
19 contractors, utilize conductive adhesives, such as solder, as packaging
20 interconnects. These packaging interconnects are formed over the wafer in the
21 form of bumps or balls, spherical in shape, which bumps are electrically and
22 thermally conductive. The packaging interconnects – or solder balls – are heated
23 and pressed against die or substrate pads to form a conductive bump or contact
24 point between the die and the flex.

25 19. In addition, Plaintiff is informed and believes and thereon alleges that
26 the Accused Products use chipsets that utilize mounting systems, including but not
27 limited to ball grid array(s) that are susceptible to damage resulting from ESD.
28 Following proper manufacturing techniques, the Defendant uses assembly tools

1 that feature the infringing dissipative and resistive technology taught by the
2 Asserted Patents.

3 20. The Accused Products, alone or in combination with other products,
4 directly or alternatively, under the doctrine of equivalents, therefore infringe each
5 of the limitations of independent claim 16 of the '927 patent in violation of 35
6 U.S.C. § 271(g) when Defendant imports into the United States or offers to sell,
7 sells, or uses within the United States a product which is made by the processes
8 described above.

9 **COUNT TWO**

10 **INFRINGEMENT OF THE '905 PATENT BY DEFENDANT**

11 21. Plaintiff re-alleges and incorporates by reference each of the
12 allegations set forth in paragraphs 1 through 12 above.

13 22. Defendant has knowledge of infringement of the '905 patent since at
14 least the filing of this complaint.

15 23. The Accused Products utilize a flip chip bonding technique during
16 manufacture and/or assembly. Flip chip bonding is used for packaging and
17 mounting integrated circuit devices utilized in the Accused Products utilizing
18 dissipative materials during handling so as to reduce ESD damage.

19 24. Flip chip bonding in the manner described in claims 53 and 55 of the
20 '905 patent has become the standard for mounting ESD-sensitive devices in order
21 to reduce parasitic resistance, inductance, and capacitance. The methods of claims
22 53 and 55 of the '905 patent are reflected in a number of manufacturing standards,
23 including, *e.g.*, the ANSI ESD S20.20 standard. By way of example, the ANSI
24 standard specifies that the current state of the art manufacturing techniques
25 involving ESD sensitive devices utilize tools with dissipative materials, *i.e.*,
26 materials that ANSI defines as having a resistance value between 1×10^4 and $1 \times$
27 10^{11} ohms surface or volume resistance. Such specification from the standard is
28 within the range set forth in the '905 patent. Plaintiff believes and alleges that

1 other applicable ESD standards require substantially similar resistance values.

2 25. Plaintiff is informed and believes and thereon alleges that Defendant
3 manufactures and assembles the Accused Products or contracts with others to
4 manufacture and assemble the Accused Products in compliance with one or more
5 of these ESD standards.

6 26. In addition, Plaintiff is informed and believes and thereon alleges that
7 Defendant manufactures and assembles the Accused Products utilizing conductive
8 adhesives per the method described by claim 53 and 55 of the '905 patent.
9 Conductive adhesive, such as solder, is used as packaging interconnects in the
10 Accused Products. The packaging interconnects are formed over the wafer in the
11 form of bumps or balls, spherical in shape, which bumps are electrically and
12 thermally conductive. The packaging interconnects – or solder balls – are heated
13 and pressed against die or substrate pads to form a conductive bump or contact
14 point between the die and the flex.

15 27. In addition, Plaintiff is informed and believes and thereon alleges that
16 the Accused Products use chipsets that utilize mounting systems, including but not
17 limited to ball grid array(s) that are susceptible to damage resulting from ESD.
18 Following proper manufacturing techniques, the Defendant uses assembly tools
19 that feature the infringing dissipative and resistive technology taught by the
20 Asserted Patents.

21 28. The Accused Products, alone or in combination with other products,
22 directly or alternatively under the doctrine of equivalents infringe each of the
23 limitations of independent claims 53 and 55 of the '905 patent in violation of 35
24 U.S.C. § 271(g) when Defendant imports into the United States or offers to sell,
25 sells, or uses within the United States a product which is made by the processes
26 described above.

27 **PRAYER FOR RELIEF**

28 WHEREFORE, Plaintiff prays for relief and judgment as follows:

- 1 1. That Defendant has infringed the Patents-in-Suit;
- 2 2. Compensation for all damages caused by Defendant’s infringement of
- 3 the Patents-in-Suit to be determined at trial;
- 4 3. A finding that this case is exceptional and an award of reasonable
- 5 attorneys fees pursuant to 35 U.S.C. § 285;
- 6 4. Granting Plaintiff pre-and post-judgment interest on its damages,
- 7 together with all costs and expenses; and,
- 8 5. Awarding such other relief as this Court may deem just and proper.

HANDAL & ASSOCIATES

Dated: May 26, 2016

By: /s/ Gabriel G. Hedrick
 Gabriel G. Hedrick
 Attorneys for Plaintiff
 Anza Technology, Inc.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all claims.

HANDAL & ASSOCIATES

Dated: May 26, 2016

By: /s/ Gabriel G. Hedrick
 Gabriel G. Hedrick
 Attorneys for Plaintiff
 Anza Technology, Inc.