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21 REVERSIBLE CONNECTIONS LLC.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA,
SOUTHERN DIVISION

REVERSIBLE CONNECTIONS LLC,
Plaintiff,
vs.
MSI COMPUTER CORP.,
Defendant.

CASE NO. 2:17-cv-5383

**ORIGINAL COMPLAINT FOR
PATENT INFRINGEMENT**

JURY TRIAL DEMANDED

1 Plaintiff REVERSIBLE CONNECTIONS LLC files its Complaint against Defendant
2 MSI COMPUTER CORP., alleging as follows:

3 **THE PARTIES**

4 1. Plaintiff REVERSIBLE CONNECTIONS LLC (“Reversible Connections”) is a
5 corporation formed and existing under the laws of the State of Delaware with its principal place
6 of business in Ottawa, Canada.

7 2. Upon information and belief, MSI COMPUTER CORP. (“MSI”) is a corporation
8 organized and existing under the laws of the State of California, with its principal place of
9 business at 901 Canada Court, City of Industry, California 91748. MSI may be served with
10 process through its registered agent, Connie Yu Chuan Chang, 901 Canada Court, City of
11 Industry, California 91748.

12 **JURISDICTION AND VENUE**

13 3. This is an action for infringement of United States patents. This Court has
14 exclusive jurisdiction of such action under Title 28 U.S.C. § 1338(a).

15 4. Upon information and belief, MSI is subject to personal jurisdiction by this Court.
16 MSI has committed such purposeful acts and/or transactions in the State of California that it
17 reasonably knew and/or expected that it could be haled into a California court as a future
18 consequence of such activity. MSI makes, uses, and/or sells infringing products within the
19 Central District of California and has a continuing presence and the requisite minimum contacts
20 with the Central District of California. Venue is proper in this District because MSI maintains its
21 principal place of business in City of Industry, California, such that this venue is a fair and
22 reasonable one. Upon information and belief, MSI has transacted and, at the time of the filing of
23 this Complaint, is continuing to transact business within the Central District of California. For
24 all of these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C.
25 §§ 1391(b)(1), (2) and (c)(2) and 28 U.S.C. § 1400(b).

26 **PATENT-IN-SUIT**

27 5. On December 2, 2008, United States Patent No. 7,458,825 (“the ‘825 Patent”)
28 was duly and legally issued for “DOUBLE-SIDED USB-COMPATIBLE PLUG CONNECTOR

1 ADAPTED FOR INSERTION IN EITHER ORIENTATION INTO A USB-COMPATIBLE
2 RECEPTACLE” A true and correct copy of the ‘825 Patent is attached hereto as Exhibit A and
3 made a part hereof. The ‘825 Patent is sometimes referred to herein as “the Patent-in-Suit.”

4 6. As it pertains to this lawsuit, the Patent-in-Suit, very generally speaking, relates to
5 universal connectors for electronics devices such as laptop and desktop computers, tablets, smart
6 phones and other devices. The invention of the ‘825 differed from prior universal connectors
7 such as those defined by the Universal Serial Bus (“USB”) standard which could only be
8 connected in one of two potential orientations (right side up or upside down). The ‘825 patent
9 discloses a connector with electrical contacts on two opposing surfaces where those contacts are
10 mutually opposed on the two surfaces. In this manner, the connector can insert into a compatible
11 receptacle in either orientation. The ‘825 patent further discloses and claims a short circuit
12 prevention device to avoid potential short circuits between the contacts and the connector.

13 **FIRST CLAIM FOR RELIEF**

14 **(Patent Infringement)**

15 7. Reversible Connections repeats and realleges every allegation set forth above.

16 8. Reversible Connections is the exclusive licensee of the Patent-in-Suit with the
17 exclusive right to enforce the Patent-in-Suit against infringers, and collect damages for all
18 relevant times, including the right to prosecute this action.

19 9. MSI has had knowledge of the existence of the Patent-in-Suit since July 13, 2017,
20 the date on which Reversible Connections sent a letter to MSI notifying it of these infringement
21 allegations.

22 10. Upon information and belief, MSI is liable under 35 U.S.C. §271(a) for direct
23 infringement of the Patent-in-Suit because it manufactures, makes, has made, uses, practices,
24 imports, provides, supplies, distributes, sells, and/or offers for sale products and/or systems that
25 practice one or more claims of the Patent-in-Suit.

26 11. Upon information and belief, MSI is also liable under 35 U.S.C. §271(b) for
27 inducing infringement of, and under 35 U.S.C. §271(c) for contributory infringement of the
28 Patent-in-Suit because it manufactures, makes, has made, uses, practices, imports, provides,

1 supplies, distributes, sells, and/or offers for sale products and/or systems that practice one or
2 more claims of the Patent-in-Suit. More specifically, MSI infringes the Patent-in-Suit because it
3 makes, uses, sells, and offers for sale products and systems with USB ports adhering to the USB
4 3.1 Type C standard, including but not limited to the models of laptops, gaming desktops, VR
5 Backpack computers, All-in-One computers, and gaming motherboards listed in Exhibit B
6 (collectively “Accused Products”). Accordingly, the USB ports include a connector having two
7 sets of mutually opposed contacts. The USB ports are capable of being connected in either
8 orientation with a compatible receptacle that is plugged into the port. The Accused Products
9 further include circuitry connected to the USB ports that provides short circuit prevention for the
10 port. By adhering to the USB 3.1 Type C standard, the Accused Products include a multi-contact
11 connector that meets each and every limitation of claim 1. By selling the Accused Products, MSI
12 in the past directly infringed and continues to directly infringe at least claim 1 of the ‘825 Patent.

13 12. By providing the MSI Accused Products, MSI has, in the past induced, and
14 continues to induce, its customers and/or end users to infringe at least claim 1 of the ‘825 Patent.
15 For example, end users of the Accused Products directly infringe at least claim 1 of the ‘825
16 Patent when using these devices.

17 13. On information and belief, MSI possessed a specific intent to induce infringement
18 by at a minimum, providing user guides and other sales-related materials, and by way of
19 advertising, solicitation, and provision of product instruction materials, that instruct its customers
20 and end users on the normal operation of the Accused Products and the USB connectors that
21 infringe the Patent-in-Suit.

22 14. By providing these devices, MSI has, in the past contributed to, and continues to
23 contribute to, the infringement of their customers and/or end users of at least claim 1 of the ‘825
24 Patent.

25 15. Upon information and belief, the USB connectors within MSI’s Accused Products
26 have no substantial non-infringing uses, and MSI knows that these connectors are especially
27 made or especially adapted for use in a product that infringes the Patent-in-Suit.
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JURY DEMAND

Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

DATED: July 20, 2017

s/ H.H. (Shashi) Kewalramani

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