

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

USB BRIDGE SOLUTIONS, LLC,

Plaintiff

-against-

BUFFALO INC. and BUFFALO
AMERICAS, INC.,

Defendants

Civil Action No.: 17-1158

Jury Trial Demanded

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff USB Bridge Solutions, LLC (“USBBS” or “Plaintiff”), by and through its undersigned attorneys, alleges, with knowledge with respect to its own acts, and on information and belief as to other matters, against Defendants Buffalo Inc. (“Buffalo–Japan”) and Buffalo Americas, Inc. (“Buffalo Americas”) (collectively, “Buffalo Defendants”), as follows:

PARTIES

1. USBBS is a limited liability company organized and existing under the laws of the State of Georgia, having its principal place of business at The Forum, Suite 140, 3930 E. Jones Bridge Road, Peachtree Corners, GA 30092.
2. Defendant Buffalo–Japan is a Japanese company having its principal place of business at 3-30-20 Ohsu Naka-ku, Nagoya, 460-0011 Japan. *See* www.buffalo.jp (last accessed Dec. 7, 2017).
3. On information and belief, Defendant Buffalo Americas is a Delaware corporation, having its principal place of business at 11100 Metric Boulevard, Suite 750, Austin, TX 78758. *See* <http://www.buffalotech.com/about/about-buffalo> (last accessed Dec. 7, 2017).

JURISDICTION AND VENUE

4. USBBS brings this action under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.*, against Buffalo Defendants for infringement of United States Patent No. 7,231,485.

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

6. Buffalo-Japan is subject to the personal jurisdiction of this Court because, among other things, Buffalo-Japan has committed and continues to commit acts of patent infringement in the State of Texas, directly, and/or through authorized distributors, including by making, using, offering to sell, and/or selling, Accused Products and services in Texas, and/or importing the Accused Products into Texas. In addition, or in the alternative, this Court has personal jurisdiction over Buffalo-Japan pursuant to Fed. R. Civ. P. 4(k)(2).

7. Buffalo Americas is subject to the personal jurisdiction of this Court because, among other things, (i) Buffalo Americas is headquartered in the State of Texas, and (ii) Buffalo Americas has committed and continues to commit acts of patent infringement in the State of Texas, including by making, using, offering to sell, and/or selling Accused Products and services in Texas.

8. Venue is proper as to Buffalo-Japan in this district under 28 U.S.C. § 1391(c) because, *inter alia*, Buffalo-Japan is a foreign corporation.

9. Venue is proper as to Buffalo Americas in this district because, *inter alia*, on information and belief, Buffalo Americas maintains a regular and established place of business in this judicial district, and Buffalo Americas has committed and continues to commit acts of patent infringement in this judicial district, including by making, using, offering to sell, and/or selling Accused Products and services in this district, and/or importing accused products and services into this district.

BACKGROUND

10. On June 12, 2007, the United States Patent and Trademark Office duly and lawfully issued United States Patent No. 7,231,485 (“the Patent-in-Suit” or the “’485 Patent”), entitled “Universal Serial Bus (USB) Interface for Mass Storage Device.”

11. David H. Harris, Gordon R. Clark, and Stephen D. Holland invented the technology claimed in the ’485 Patent.

12. USBBS is the assignee and owner of the right, title, and interest in and to the ’485 Patent, including the right to assert all claims arising under said patent and the right to any remedies for infringement, including past damages.

COUNT I: INFRINGEMENT OF THE ’485 PATENT

13. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

14. The Buffalo Defendants have infringed, and continue to infringe, the ’485 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, offering to sell, selling in the United States or importing into the United States the MiniStation Portable Drive, MiniStation Thunderbolt Portable Drive, Ministation Extreme NFC Portable Drive, DriveStation external drive, DriveStation Axis Velocity external drive, DriveStation DDR external drive, and all other external and/or portable drives and drive enclosures comprising a USB interface, SATA functionality, and that infringe at least one claim of the ’485 Patent (“Accused Products”).

15. For example, on information and belief, the Buffalo Defendants have infringed at least claim 5 of the ’485 Patent by making, using, offering to sell, selling in the United States or importing into the United States Accused Products that include a motherboard for a mass storage device, such as the Buffalo MiniStation HD-PCFU3D USB 3.0 Hard Drive. The Accused

Products include a bridging System-on-Chip, such as the MediaLogic MLDU 3 L. *See* Ex. 1, MLDU 3 L Website Description (Google Translate Version). *See also* Ex. 2, Photograph of a Buffalo motherboard for a mass storage device (from the Buffalo MiniStation HD-PCFU3D USB 3.0 Hard Drive).

16. Accused Products comprise input logic configured to receive an input signal from a read unit of the mass storage device. *See, e.g.*, Ex. 1 at p. 1 (“MLDU 3 L is a bridge LSI that converts SATA 6 Gbps devices to USB 3.0 devices. It supports SATA ODD (DVD / BD etc) by supporting ATAPI protocol as well as SATA HDD / SSD . . . Device interface SATA 3 6 Gbps ATA / ATAPI device compatible, NCQ (Native Command Queuing) compatible”).

17. The Accused Products comprise a bridging circuit configured to receive the input signal from the input logic and convert the input signal into a USB signal. Ex. 1 at p. 1 (“MLDU 3 L is a bridge LSI that converts SATA 6 Gbps devices to USB 3.0 devices.”). *See also* Ex. 2.

18. The bridging circuit includes a USB physical interface transceiver. Ex. 1 at p. 1 (“Host interface USB 3.0 (5 Gbps) . . . Supports USB mass storage class compliant UAS (USB Attached SCSI)”). *See also* Ex. 3, Universal Serial Bus Specification, Revision 2.0, p. 120 (“Figure 7-1 depicts an example implementation which largely utilizes USB 1.1 transceiver elements and adds the new elements required for high-speed operation.”).

19. The bridging circuit includes a serial interface engine coupled to the USB physical interface transceiver. *See, e.g.*, Ex. 1, Media Logic Protocol conversion LSI, at p. 1 (“Host interface USB 3.0 (5 Gbp) . . . Supports USB mass storage class compliant UAS (USB Attached SCSI)”). *See also* Ex. 4, Universal Serial Bus Specification, Revision 2.0, p. 32, Fig. 5-9 (depicting serial interface engine (SIE)). The serial interface engine is coupled to the USB physical interface transceiver, such as by a bus.

20. The bridging circuit includes an input/output interface coupled to the serial interface engine. *See* Exs. 4-5, Universal Serial Bus Specification, Revision 2.0, p. 32, Fig. 5-9 and p. 33, Fig. 5-10 (a serial interface that is coupled to the USB physical interface). In another example, the conversion logic includes a peripheral interface, which is an input/output interface. The exemplary interfaces are coupled to the serial interface engine, such as by a bus.

21. On information and belief, the bridging circuit includes a ram control circuit coupled to the input/output interface, such as RAM and buffer control circuits internal to the MLDU 3 L. *See, e.g.*, Ex. 1.

22. On information and belief, the bridging circuit includes a global control circuit coupled to the input/output interface. For example, Accused Products include a USB control circuit, a SATA control circuit, and/or a chip control circuit. The exemplary global control circuits are coupled to the input/output interface, such as by a bus.

23. The bridging circuit includes a translate circuit coupled to the global control circuit. For example, the circuit that carries out the SATA-USB protocol conversion includes a translate circuit. *See* Ex. 1 (“MLDU 3 L is a bridge LSI that converts SATA 6 Gbps devices to USB 3.0 devices”). The translate circuit is coupled to the global control circuit, such as by a bus.

24. The bridging circuit includes a disk interface coupled to the ram control circuit and the translate circuit. *See, e.g.*, Ex. 1 USB 3.0 to SATA 6 Gbps conversion LSI “MLDU3L,” Diagram at p. 2. *See also id.* (“Device interface SATA 3 6 Gbps ATA / ATAPI device compatible . . .”).

25. The Accused Products include output circuitry configured to output the USB signals from the motherboard. For example, circuit boards in the Accused Products include circuitry between the USB output pins of the bridging chip and the physical USB port on the circuit board. *See,*

e.g., Ex. 2.

26. On information and belief, Buffalo Defendants have infringed and continue to infringe the '485 Patent without a license.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment in its favor against each of the Buffalo Defendants, and specifically, for the following relief:

- A. Entry of judgment in favor of USBBS against the Buffalo Defendants on all counts;
- B. Entry of judgment that the Buffalo Defendants have infringed the Patent-in-Suit;
- C. Award of compensatory damages adequate to compensate USBBS for the Buffalo Defendants' infringement of the Patent-in-Suit, in no event less than a reasonable royalty as provided by 35 U.S.C. § 284;
- D. USBBS's costs;
- E. Pre-judgment and post-judgment interest on USBBS's award; and
- F. All such other and further relief as the Court deems just or equitable.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Fed. R. Civ. Proc., Plaintiff hereby demands trial by jury in this action of all claims so triable.

Dated: December 12, 2017

Respectfully submitted,

/s/ Craig S. Jepson

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