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

USB BRIDGE SOLUTIONS, LLC,
 	
         Plaintiff
 	
  -against-
 	
AVANT TECHNOLOGY, INC. d/b/a EDGE
MEMORY,
 	
         Defendant
	Civil Action No.: 1:17-cv-01159
	
	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, by way of this Complaint against Defendant Avant Technology, Inc. d/b/a EDGE Memory ("EDGE" or "Defendant"), 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. EDGE, is a Nevada corporation, having its principal place of business at 828 New Meister Lane, Suite 300, Pflugerville, TX 78660.

JURISDICTION AND VENUE

3. This is an action under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.*, for infringement by EDGE of United States Patent No. 7,231,485.

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

5.   EDGE is subject to the personal jurisdiction of this Court because, among other things, (i) EDGE is headquartered in the State of Texas, and (ii) EDGE 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 the State of Texas, and/or importing Accused Products and services into the State of Texas.

6.   Venue is proper as to EDGE in this district pursuant to 28 U.S.C. § 1400(b) because, *inter alia*, on information and belief, EDGE maintains a regular and established place of business in this judicial district, and EDGE 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

7.   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."

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

9.   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 the right to recover past damages.

COUNT I: INFRINGEMENT OF THE '485 PATENT

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

11.   EDGE has infringed, and continues 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 EDGE DiskGO Portable hard drive

(160 GB USB 2.0), EDGE DiskGO Portable hard drive (500GB USB 3.0), EDGE DiskGO

Portable hard drive (1TB USB 2.0), EDGE DiskGO Portable hard drive (1TB USB 3.0), EDGE

DiskGO Portable hard drive (2TB USB 3.0), EDGE DiskGO SuperSpeed hard drive (1TB USB

3.0), EDGE DiskGO SuperSpeed hard drive (2TB USB 3.0), EDGE DiskGO SuperSpeed

Portable hard drive (500 GB USB 3.0), EDGE DiskGO hard drive (1TB USB 2.0), EDGE

DiskGO hard drive (2TB USB 2.0), EDGE DiskGO hard drive (6TB USB 3.0), EDGE DiskGO

hard drive (8TB USB 3.0), EDGE DiskGO hard drive (320GB USB 2.0), and all other external

or portable EDGE hard drives and hard drive enclosures comprising a USB interface, ATA

functionality, and that otherwise infringe the '485 Patent ("Accused Products").

12.   For example, on information and belief, EDGE has 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

"EDGE diskGO Portable USB Hard Drive." The Accused Products also include a bridging

System-on-Chip, such as the ASM1053. *See* Ex. 1, ASM1053 Webpage Summary. *See also* Ex.

2, Photograph of an EDGE motherboard for a mass storage device (from DiskGO EDGE

Portable USB 3.0, 1TB drive).

13.   The Accused Products comprise input logic configured to receive an input signal from a

read unit of the mass storage device. *See* Ex. 1 ("Compliance with Serial ATA Specification

Revision 3.0" and "Serial ATA bus up to 6Gbps Signal bandwidth").

14.   The Accused Products comprise a bridging circuit configured to receive the input signal

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from the input logic and convert the input signal isnto a USB signal. Ex. 1, ASM1053

("ASM1053 is the ASMedia 2nd generation single chip solution to bridge the SuperSpeed USB

(USB3.0) and High Speed USB (USB2.0) to Serial ATA host interface, embedding 8-bit

microprocessor, integrating voltage regulators and spread spectrum control, enhancing the

performance, supporting newest USB Attached SCSI Protocol specification."). *See also* Ex. 2.

15.   The bridging circuit includes a USB physical interface transceiver. Ex. 1, ASM1053

Summary ("Compliant with USB3.0 Specification Revision 1.0 . . . Compliant with USB

Specification Revision 2.0"). *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.").

16.   The bridging circuit includes a serial interface engine coupled to the USB physical

interface transceiver. *See, e.g.* 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.

17.   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.

18.   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 ASM1053.

See, e.g., Ex. 1.

19.   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 Device Control, a SATA Host Control, and/or microprocessor global control circuits. *See, e.g.,* Ex. 1. The exemplary global control circuits are coupled to the input/output interface, such as by a bus.

20.   The bridging circuit includes a translate circuit, such as the microprocessor, coupled to the global control circuit. *See* Ex. 1. The microprocessor is coupled to the global control circuit, such as by a bus.

21.   The bridging circuit includes a disk interface coupled to the ram control circuit and the translate circuit, such as the SATA PHY and accompanying circuitry. *See* Ex. 1 ("Compliance with Serial ATA Specification Revision 3.0" and "ASM1053 splits to two products: One is ASM1053 which supports Series ATA 1.5/3.0 Gbps and the other is ASM1053E integrated with ASMedia Series ATA 6 Gbps PHY.").

22.   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.

23.   On information and belief, EDGE has infringed and continues to infringe the '485 Patent without a license.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment in its favor against EDGE, and specifically, for the following relief:

A.   Entry of judgment in favor of USBBS against EDGE on all counts;

B.   Entry of judgment that EDGE has infringed the Patent-in-Suit;

C.   Award of compensatory damages adequate to compensate USBBS for EDGE's 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,

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