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10 ATTORNEYS FOR DARFON ELECTRONICS CORP.

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13

14 DARFON ELECTRONICS CORP., a Taiwanese
15 corporation,

16 Plaintiff,

17 vs.

18 LITE-ON SINGAPORE PTE. LTD., a
Singaporean company, LITE-ON
19 TECHNOLOGY CORPORATION, a Taiwanese
corporation, LITE-ON TRADING USA, INC., a
20 California corporation, and SILITEK
ELECTRONICS (DONGGUAN) CO., LTD. a
21 Chinese company,

22 Defendants.
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Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

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2 This is an action for patent infringement arising under the Patent Laws of the United States of
3 America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Darfon Electronics Corporation makes the
4 following allegations against Defendants Lite-On Singapore Pte. Ltd., Lite-On Technology
5 Corporation, Lite-On Trading USA, Inc., and Silitek Electronics (Dongguan) Co., Ltd.

6 **Parties**

7 1. Darfon Electronics Corporation (“Darfon”) is a Taiwanese company located at No.
8 167, Shanying Road, Guishan Dist., Taoyuan City 333, Taiwan, R.O.C.

9 2. Darfon was founded in May 1997 and is dedicated to providing “one stop shopping”
10 precision components to ODM and OEM clients. Darfon’s product lines include: Human Interface
11 Devices, Power & Energy Devices, Integrated Components & Materials, and Green Devices. Darfon
12 is the world’s number one notebook keyboard manufacturer. Darfon acquired more than 1,300
13 patents worldwide and 8 international design awards in the past 15 years.

14 3. On information and belief, Lite-On Singapore Pte. Ltd. (“Lite-On Singapore”) is a
15 Singaporean company located at 22, Sin Ming Lane #03-83, Midview City, Singapore, 573969.

16 4. On information and belief, Lite-On Technology Corporation (“Lite-On”) is a
17 Taiwanese corporation located at 392 Ruey Kwang Road, Neihu, Taipei, Taiwan, R.O.C. 114.

18 5. On information and belief, Lite-On Trading USA, Inc. (“Lite-On USA”) is a
19 California corporation located at 720 S Hillview Dr., Milpitas, California, 95035.

20 6. On information and belief, Silitek Electronics (Dongguan) Co., Ltd. (“Silitek”) is a
21 Chinese company located at The Mid. of KeJi (Science and Technology) Road, Shi Jie Town,
22 Dongguan City, Guangdong Province, P.R. China.

23 7. On information and belief, Lite-On Singapore, Lite-On USA, and Silitek are
24 subsidiaries of Lite-On (collectively, “Defendants”). Defendants collectively make, import, sell
25 and/or offer for sale infringing products in the United States, including in the State of California and
26 in this District.

JURISDICTION AND VENUE

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3 8. This action arises under the patent laws of the United States, Title 35 of the United
4 States Code. Thus, this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5 9. This Court has personal jurisdiction over Defendants in this action. Defendants are
6 subject to this Court’s specific and general personal jurisdiction pursuant to due process and/or the
7 California Long Arm Statute because Defendant Lite-On USA is incorporated in California, and due
8 at least to their substantial business conducted in this forum, directly and/or through intermediaries,
9 including (i) having solicited business in the State of California and in this District, transacted
10 business within the State of California and in this District, and attempted to derive financial benefit
11 from residents of the State of California and this District, including benefits directly related to the
12 patent infringement claims set forth herein; (ii) having placed their products and services into the
13 stream of commerce throughout the United States and having been actively engaged in transacting
14 business in California and in this District; and (iii) either alone or in conjunction with others, having
15 committed acts of infringement within California and in this District, as, on information and belief,
16 the Defendants, directly and/or through intermediaries, have advertised (including through websites),
17 offered to sell, sold and/or distributed infringing products, and/or have induced the sale and use of
18 infringing products in the United States and in California and in this District. Further, the
19 Defendants have, directly or through their distribution network, purposefully and voluntarily placed
20 such products in the stream of commerce knowing and expecting them to be purchased and used by
21 consumers in California and in this District. The Defendants have either committed direct
22 infringement in California or committed indirect infringement based on acts of direct infringement in
23 California and in this District. In addition, on information and belief, the Defendants are subject to
24 the Court’s general jurisdiction, including from regularly doing or soliciting business, engaging in
25 other persistent courses of conduct, deriving substantial revenue from goods and services provided to
26 individuals in California and in this District, and/or based on Defendant Lite-On USA’s presence
27 and physical location in California.

28 10. On information and belief, the Defendants do one or more of the following with the
computer keyboards that embody the patented technology: (a) make these devices in the United

1 States for sale to customers, including customers in California; (b) import these devices into the
2 United States for sale to consumers, including consumers in California; (c) sell them or offer them
3 for sale in the United States, including to customers in California; and/or (d) sell them to customers
4 who incorporate them into products that such customers import, sell, or offer for sale in the United
5 States, including in California.

6 11. Thus, Defendants have purposefully availed themselves of the benefits of doing
7 business in the State of California and the exercise of jurisdiction over Defendants would not offend
8 traditional notions of fair play and substantial justice.

9 12. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b) because
10 Defendant Lite-On USA is a California corporation with a principal place of business in this District,
11 and because Defendants Lite-On Singapore, Lite-On, and Silitek are foreign corporations.

12 **INTRADISTRICT ASSIGNMENT**

13 13. This is an Intellectual Property Action within the meaning of Civil Local Rule 3-2(c)
14 and is to be assigned on a district-wide basis.

15 **BACKGROUND**

16 14. Darfon is the owner by assignment of U.S. Patent No. 6,054,939 (“the ’939 Patent”),
17 titled “Keyboard Assembly.” The ’939 Patent was duly and legally issued by the United States
18 Patent and Trademark Office on April 25, 2000. A true and correct copy of the ’939 Patent is
19 included as Exhibit A to this Complaint.

20 15. Darfon is the owner of all rights, title, and interest in and to the ’939 Patent, including
21 all rights to sue and recover for any infringement of the ’939 Patent.

22 16. Defendants have been aware of the ’939 Patent since at least as early as November 4,
23 2002, when, upon information and belief, Silitek Corp. merged with Defendant Lite-On. Several
24 Silitek Corp. patents, including at least U.S. Patent No. 6,467,683 and U.S. Patent No. 6,542,355,
25 cite to the ’939 Patent as prior art. At least U.S. Patent No. 6,467,683 issued prior to November 4,
26 2002.
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1 17. On October 25, 2017, Darfon sent Lite-On a letter informing it of its infringement of
2 the '939 Patent. Upon information and belief, Lite-On received Darfon's letter on October 26, 2017.
3 Defendants have been on notice at least as early as Lite-On's receipt of Darfon's October 25, 2017
4 letter of the '939 Patent and their infringement of one or more claims of the '939 Patent. Despite
5 Darfon's attempt to engage Defendants and despite Defendants' knowledge that their actions
6 constituted and continue to constitute infringement of one or more claims of the '939 Patent since at
7 least receipt of Darfon's October 25, 2017 letter, Defendants refused to stop infringing the '939
8 Patent.

9 18. Darfon is the owner by assignment of U.S. Patent No. 6,538,222 ("the '222 Patent"),
10 titled "Push Button Switch Apparatus and Method of Assembling the Same." The '222 Patent was
11 duly and legally issued by the United States Patent and Trademark Office on March 25, 2003. A
12 true and correct copy of the '222 Patent is included as Exhibit B to this Complaint.

13 19. An Ex Parte Reexamination Certificate for the '222 Patent was duly and legally
14 issued by the United States Patent and Trademark Office on October 11, 2013. A true and correct
15 copy of the Ex Parte Reexamination Certificate for the '222 Patent is included as Exhibit C to this
16 Complaint.

17 20. Darfon is the owner of all rights, title, and interest in and to the '222 Patent, including
18 all rights to sue and recover for past and future infringement.

19 21. On July 16, 2012, Darfon sent Lite-On a letter informing it of its infringement of the
20 '222 Patent. Defendants have been on notice at least as early as Lite-On's receipt of Darfon's July
21 16, 2012 letter of the '222 Patent and their infringement of one or more claims of the '222 Patent.
22 Further, on February 12, 2015, Darfon sent Lite-On an email with the '222 Patent and '222
23 Reexamination Certificate and identified an infringing Lite-On product. Despite Darfon's attempt to
24 engage Defendants and despite Defendants' knowledge that their actions constituted and continue to
25 constitute infringement of one or more claims of the '222 Patent since at least July 16, 2012,
26 Defendants have refused to stop infringing the '222 Patent or enter into a reasonable, current license
27 agreement for the '222 Patent.
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1 22. Darfon is the owner by assignment of U.S. Patent No. 6,633,012 (“the ’012 Patent”),
2 titled “Key Device with a Scissors-like Structure.” The ’012 Patent was duly and legally issued by
3 the United States Patent and Trademark Office on October 14, 2003. A true and correct copy of the
4 ’012 Patent is included as Exhibit D to this Complaint.

5 23. Darfon is the owner of all rights, title, and interest in and to the ’012 Patent, including
6 all rights to sue and recover for past and future infringement.

7 24. Defendants have been on notice at least by the date of service of this Complaint of the
8 ’012 Patent and their infringement of one or more claims of the ’012 Patent.

9 25. Darfon is the owner by assignment of U.S. Patent No. 6,860,612 (“the ’612 Patent”),
10 titled “Illuminated Keyboard Switch Structure.” The ’612 Patent was duly and legally issued by the
11 United States Patent and Trademark Office on March 1, 2005. A true and correct copy of the ’612
12 Patent is included as Exhibit E to this Complaint.

13 26. An Ex Parte Reexamination Certificate for the ’612 Patent was duly and legally
14 issued by the United States Patent and Trademark Office on October 15, 2014. A true and correct
15 copy of the Ex Parte Reexamination Certificate for the ’612 Patent is included as Exhibit F to this
16 Complaint.

17 27. Darfon is the owner of all rights, title, and interest in and to the ’612 Patent, including
18 all rights to sue and recover for past and future infringement.

19 28. On July 16, 2012 and again on October 3, 2014, Darfon sent Lite-On a letter
20 informing it of its infringement of the ’612 Patent. Defendants have been on notice at least as early
21 as Lite-On’s receipt of Darfon’s July 16, 2012 letter of the ’612 Patent and their infringement of one
22 or more claims of the ’612 Patent. Despite Darfon’s attempt to engage Defendants and despite
23 Defendants’ knowledge that their actions constituted and continue to constitute infringement of one
24 or more claims of the ’612 Patent since at least July 16, 2012, Defendants have refused to stop
25 infringing the ’612 Patent or enter into a reasonable, current license agreement for the ’612 Patent.

26 29. Darfon is the owner by assignment of U.S. Patent No. 8,253,598 (“the ’598 Patent”),
27 titled “Light-emitting Keyboard.” The ’598 Patent was duly and legally issued by the United States
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1 Patent and Trademark Office on August 28, 2012. A true and correct copy of the '598 Patent is
2 included as Exhibit G to this Complaint.

3 30. An Ex Parte Reexamination Certificate for the '598 Patent was duly and legally
4 issued by the United States Patent and Trademark Office on November 13, 2013. A true and correct
5 copy of the Ex Parte Reexamination Certificate for the '598 Patent is included as Exhibit H to this
6 Complaint.

7 31. Darfon is the owner of all rights, title, and interest in and to the '598 Patent, including
8 all rights to sue and recover for past and future infringement.

9 32. On October 3, 2014, Darfon sent Lite-On a letter informing it of its infringement of
10 the '598 Patent. Defendants have been on notice at least as early as Lite-On's receipt of Darfon's
11 October 3, 2014 letter of the '598 Patent and their infringement of one or more claims of the '598
12 Patent. Despite Darfon's attempt to engage Defendants and despite Defendants' knowledge that
13 their actions constituted and continue to constitute infringement of one or more claims of the '598
14 Patent since at least Lire-On's receipt of Darfon's October 2, 2014 letter, Defendants have refused to
15 stop infringing the '598 Patent or enter into a reasonable, current license agreement for the '598
16 Patent.

17 33. Darfon is the owner by assignment of U.S. Patent No. 9,875,864 ("the '864 Patent"),
18 titled "Keyboard and Backlight Module." The '864 Patent was duly and legally issued by the United
19 States Patent and Trademark Office on January 23, 2018. A true and correct copy of the '864 Patent
20 is included as Exhibit I to this Complaint.

21 34. Darfon is the owner of all rights, title, and interest in and to the '864 Patent, including
22 all rights to sue and recover for past and future infringement.

23 35. Defendants have been on notice at least as early as service of this Complaint of the
24 '864 Patent and their infringement of one or more claims of the '864 Patent.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,054,939

36. Plaintiff incorporates by reference Paragraphs 1 through 35 above as if fully set forth herein.

37. Defendants make, use, offer for sale, sell, and/or import in the United States products and/or services that have infringed and continue to infringe one or more claims of the '939 Patent, including but not limited to Claims 1-5, 9-11 and 13-17, pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents. Defendants' infringing products include, for example and without limitation, all versions and variations, including predecessor and successor models, of the Dell KB 216T model computer keyboard (SC-KSK467, SK8123 US, 812-01017-00B) ("Dell KB 216T"), which, on information and belief, Defendants manufacture for Dell, and any other similar products that infringe at least one claim of the '939 Patent. Defendants' infringing products are collectively referred to hereinafter as "the '939 Accused Products."

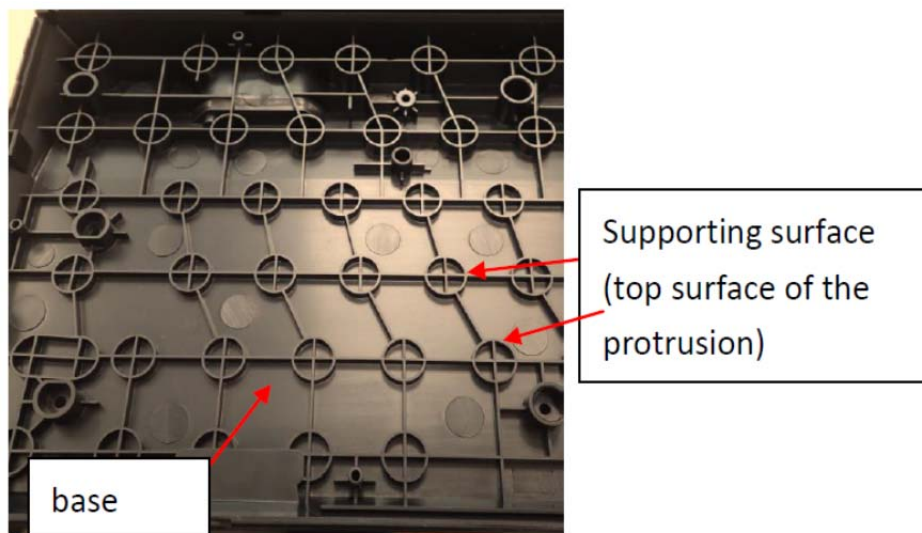
38. The '939 Accused Products are covered by one or more claims of the '939 Patent, including at least Claims 1-5, 9-11 and 13-17, because they contain each element of those claims.

39. By way of example, the Dell KB 216T infringes Claim 1 of the '939 Patent because it is a keyboard assembly with a base having a supporting surface:

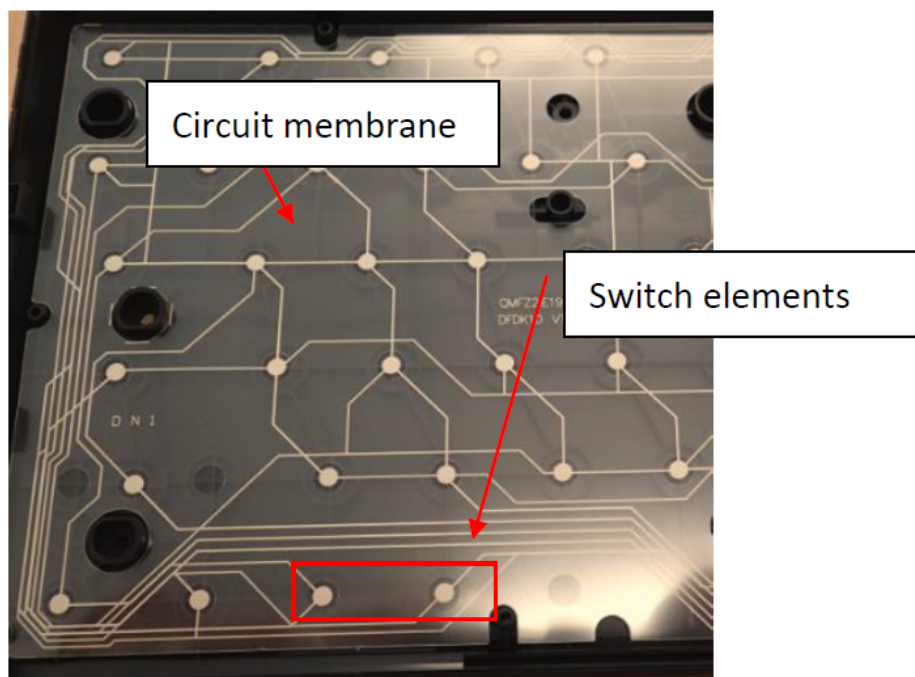


Keyboard assembly

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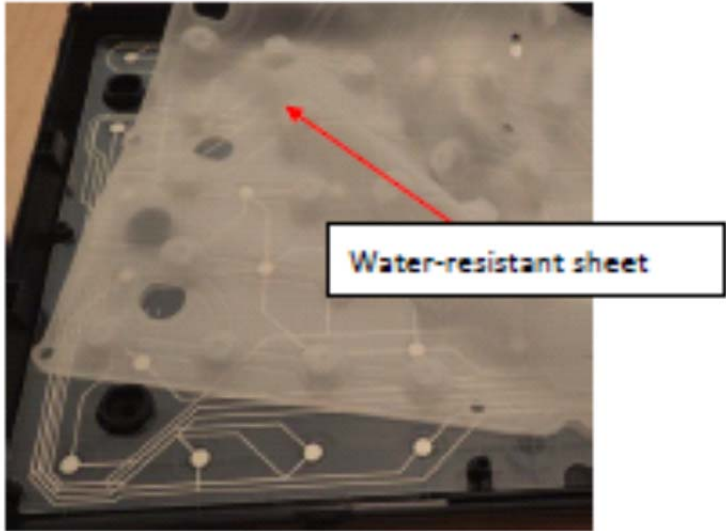


40. The Dell KB 216T also includes a circuit membrane mounted on the supporting surface of the base having a plurality of switch elements:

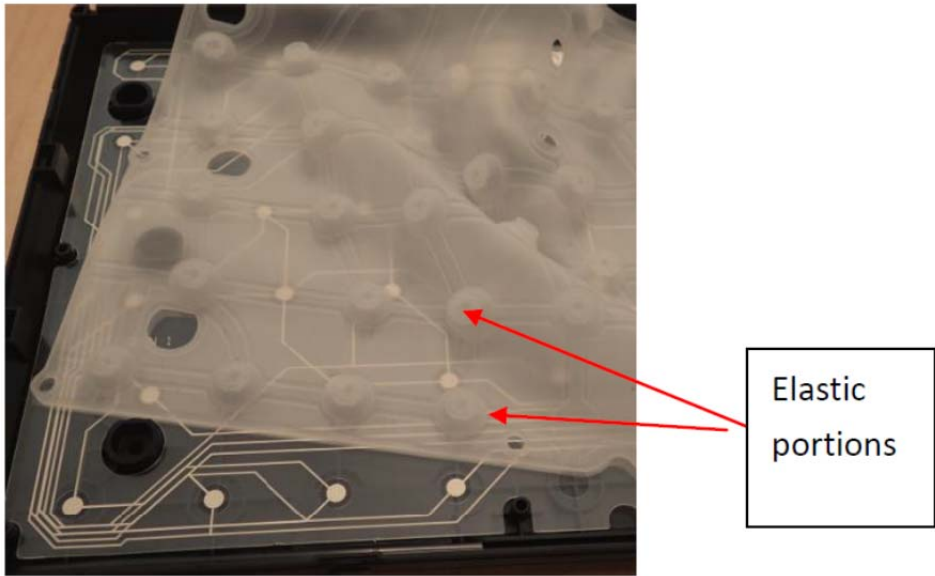


41. The Dell KB 216T also includes a water-resistant sheet covering the circuit membrane:

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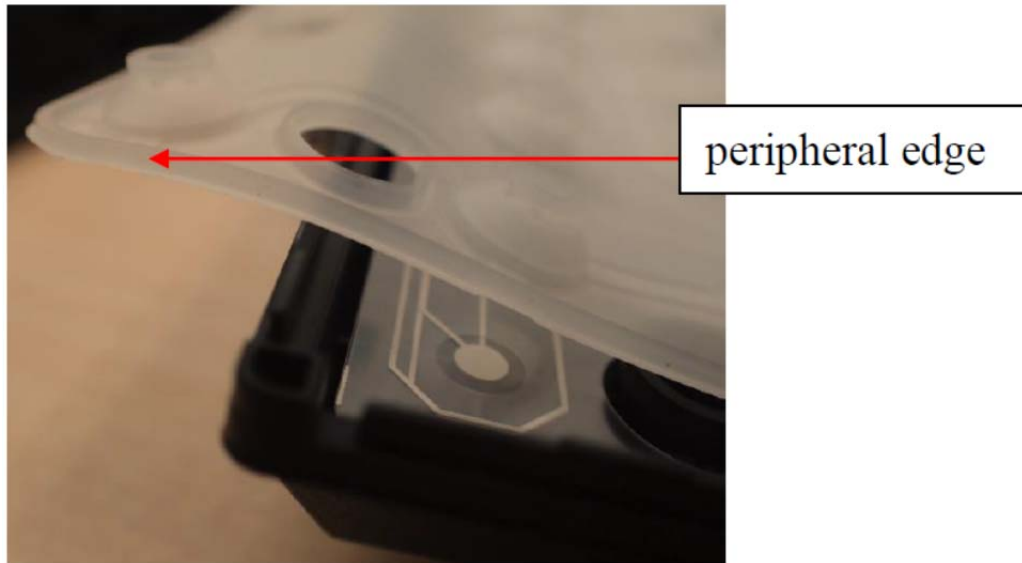


42. The water-resistant sheet of the Dell KB 216T has a plurality of elastic portions protruded therefrom, each of which is disposed corresponding to each of the switch elements:

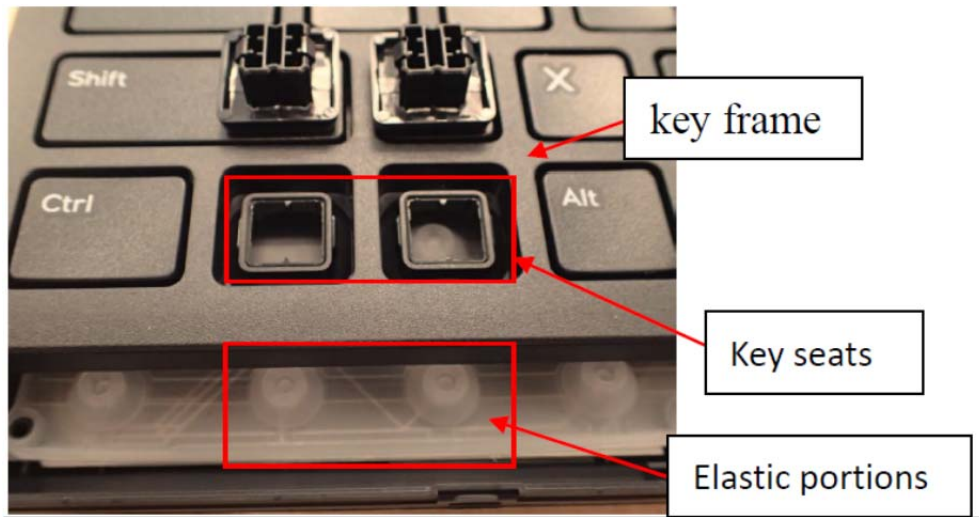


43. The water resistant sheet of the Dell KB 216T also has a peripheral edge:

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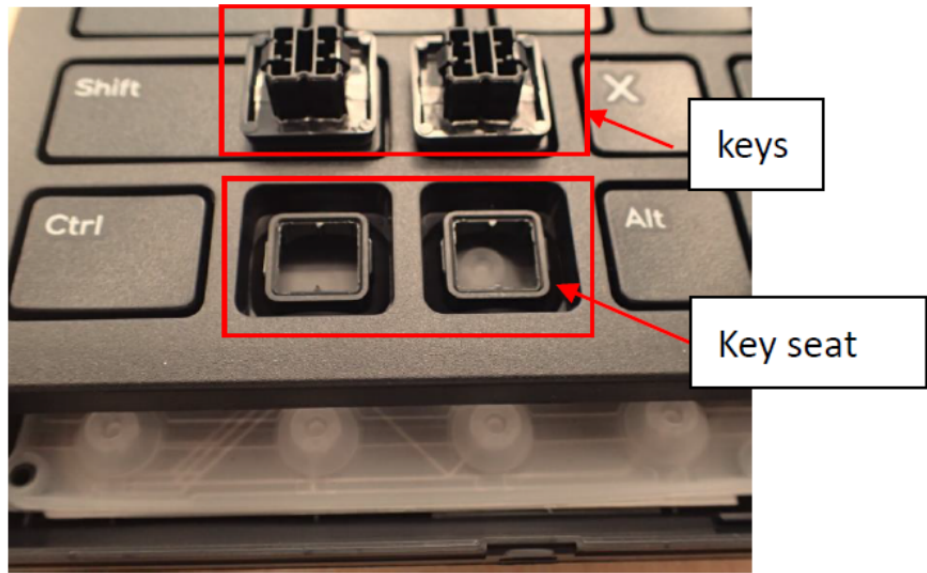


44. In addition, the Dell KB 216T includes a key frame above the water-resistant sheet with a plurality of key seats disposed corresponding to the elastic portions:



45. The Dell KB 216T includes a plurality of keys, each mounted on a respective key seat so that when a key is pressed down, its corresponding elastic portion is depressed to activate its associated switch element:

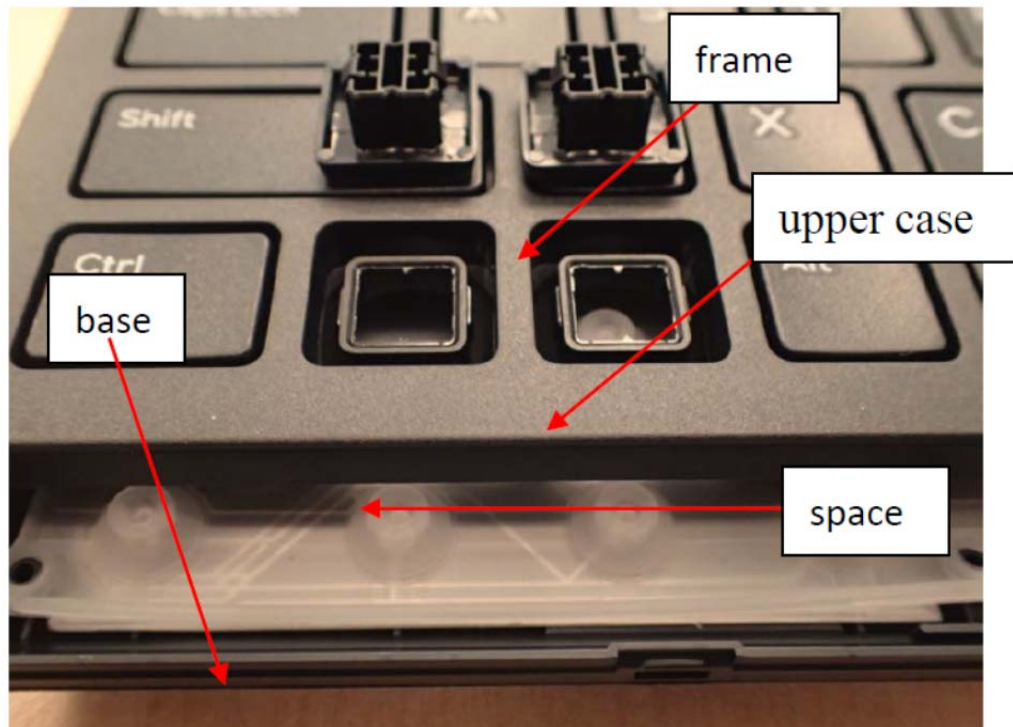
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46. Finally, the Dell KB 216T also includes an upper case mounted on the base, wherein a space for collecting liquid is formed between the key frame and the water-resistant sheet, the space communicating with the plurality of key seats such that liquid entering the key seats flows into the space:

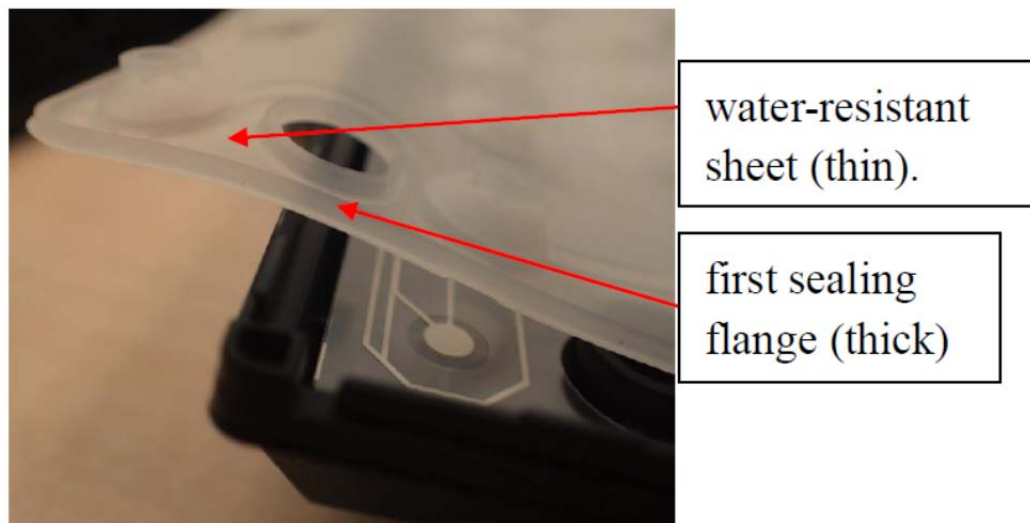
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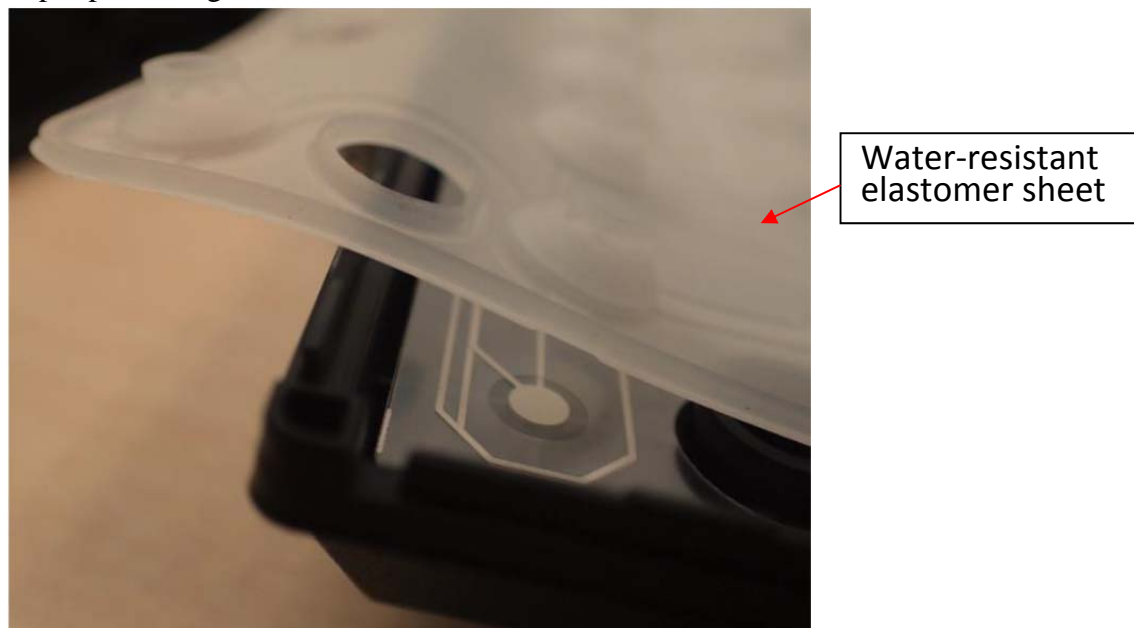
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47. By way of further example, the Dell KB 216T also infringes Claim 2 of the '939 Patent because it also includes a first sealing flange mounted on the peripheral edge, thereby surrounding the water resistant sheet:

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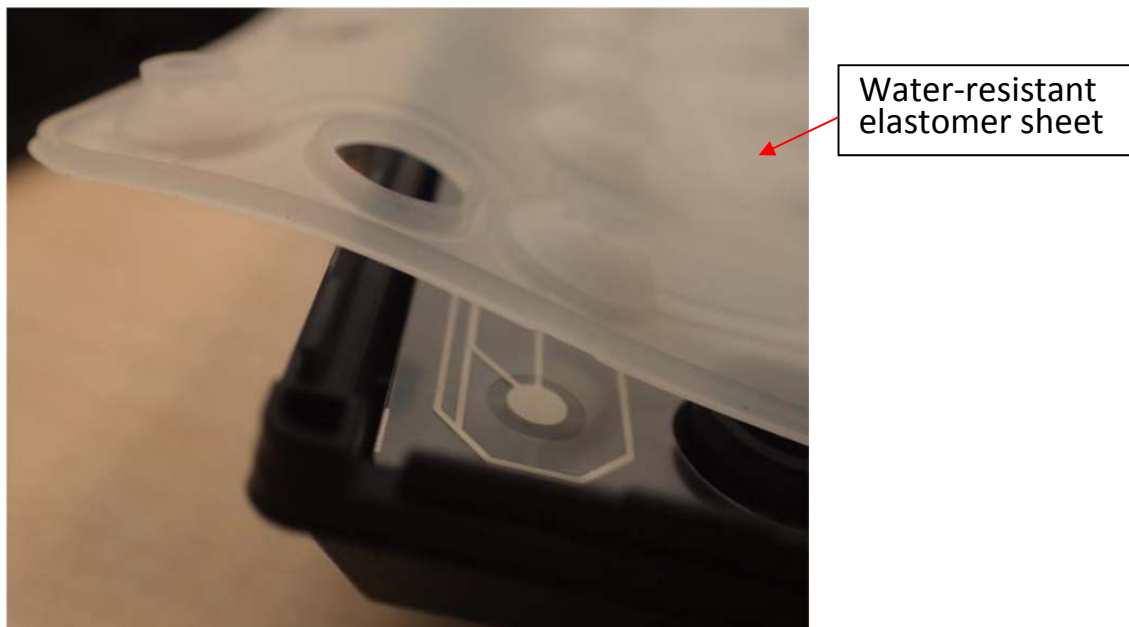


48. By way of further example, the Dell KB 216T infringes Claim 3 of the '939 Patent because the above-identified first sealing flange is integrally formed with the water-resistant sheet along the peripheral edge:

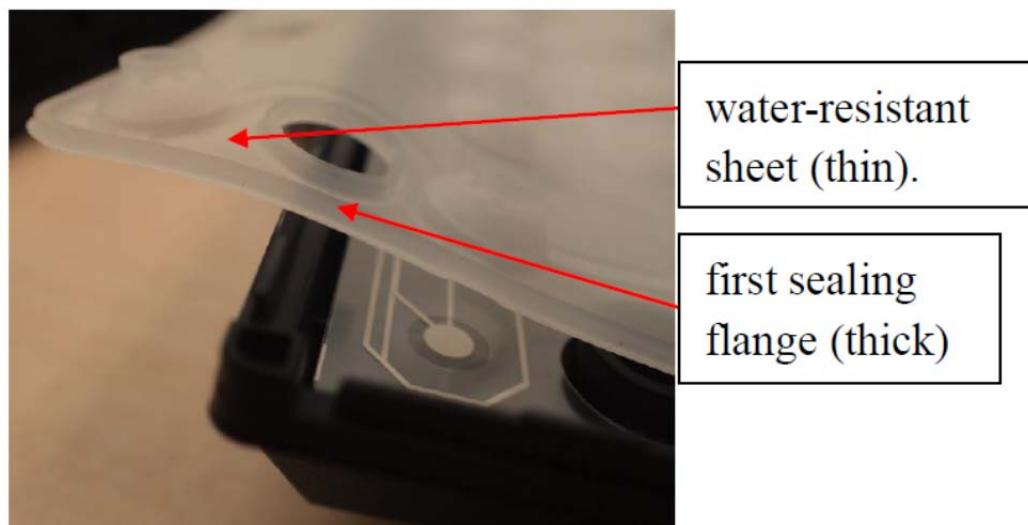


49. By way of further example, the Dell KB 216T also infringes Claim 4 of the '939 Patent because the water resistant sheet is made from elastomer material:

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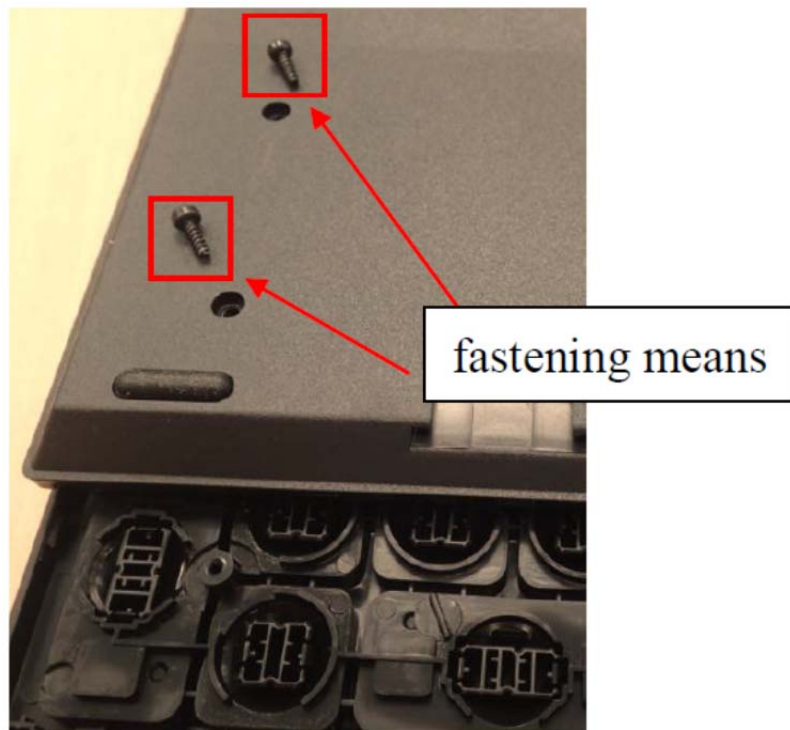


50. By way of further example, the Dell KB 216T also infringes Claim 5 of the '939 Patent because the thickness of the first sealing flange is greater than the thickness of the water-resistant sheet:

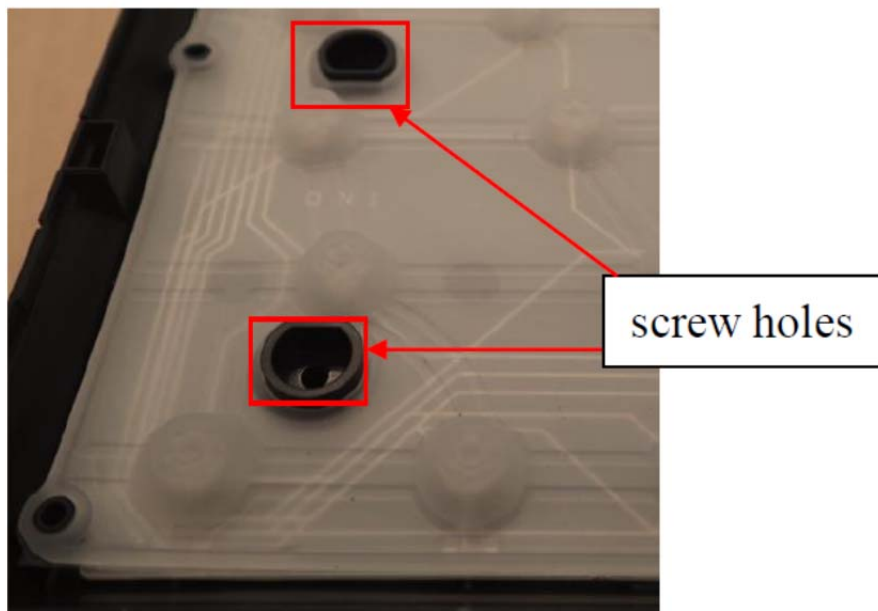


51. By way of further example, the Dell KB 216T also infringes Claim 9 of the '939 Patent because it includes a plurality of fastening means for securing the base, circuit membrane, and water-resistant sheet to the key frame:

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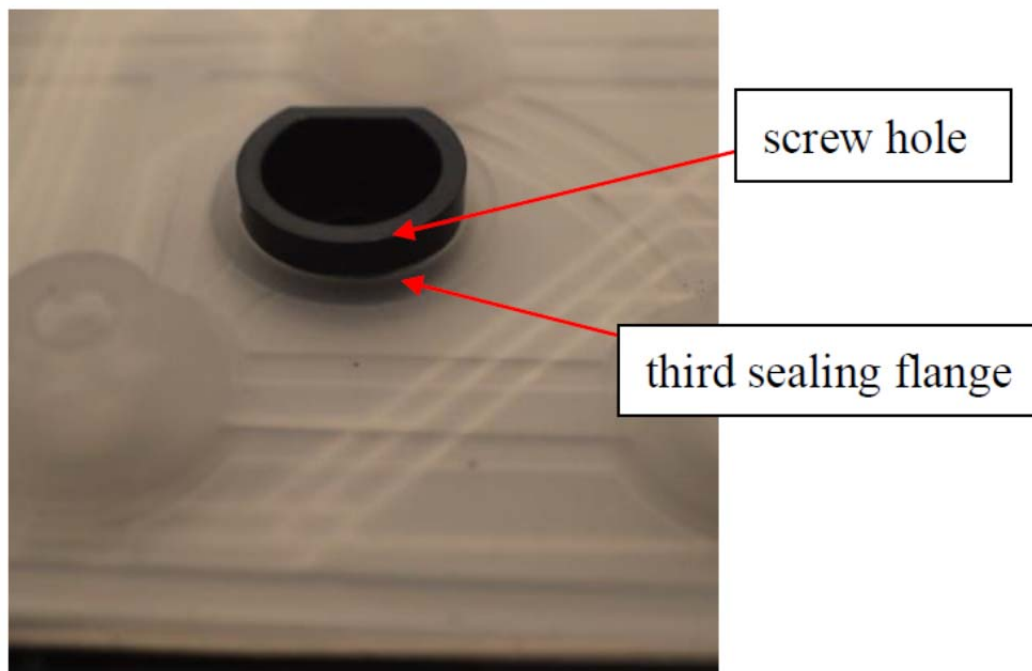


52. By way of further example, the Dell KB 216T also infringes Claim 10 of the '939 Patent because the fastening means are screw bolts that are respectively received in a plurality of screw holes formed through the base, circuit membrane, and water-resistant sheet:

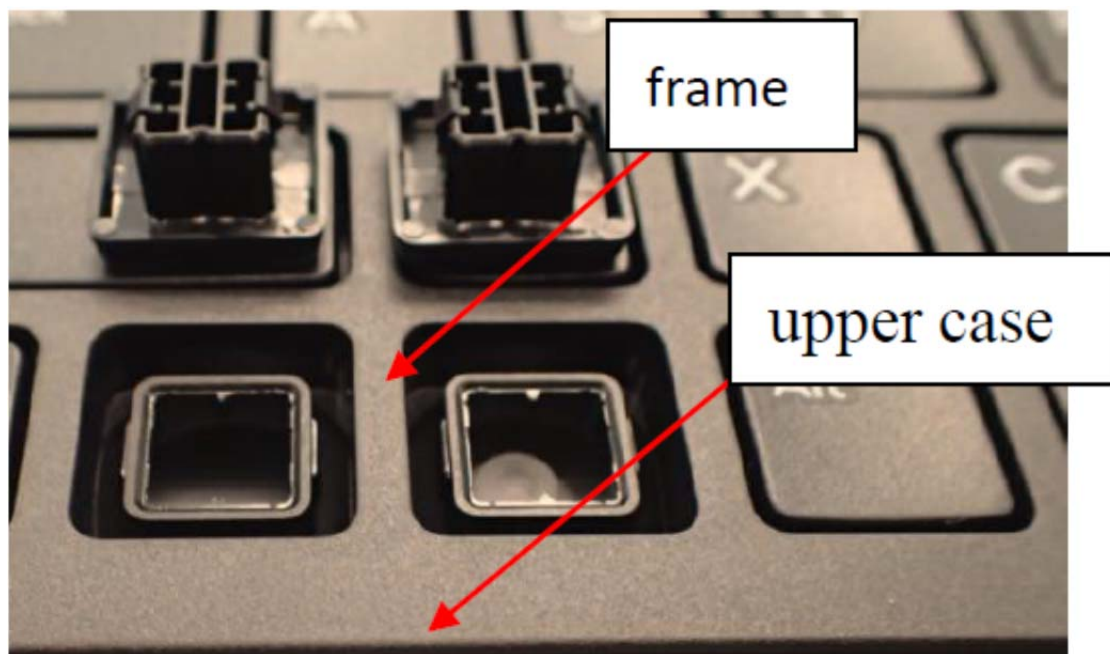


53. By way of further example, the Dell KB 216T also infringes Claim 11 of the '939 Patent because it includes a third sealing flange surrounding the screw holes:

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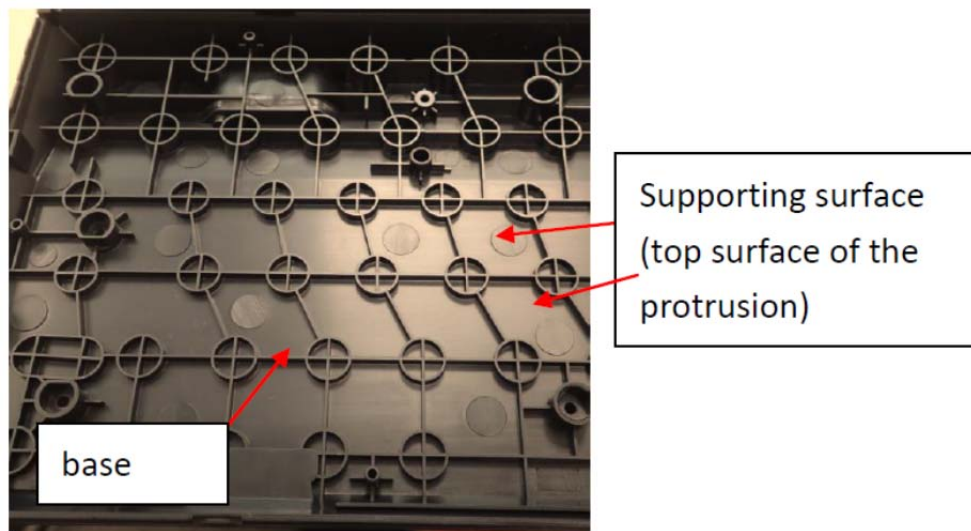


54. By way of further example, the Dell KB 216T also infringes Claim 13 of the '939 Patent because its key frame is integrally formed with its upper case:

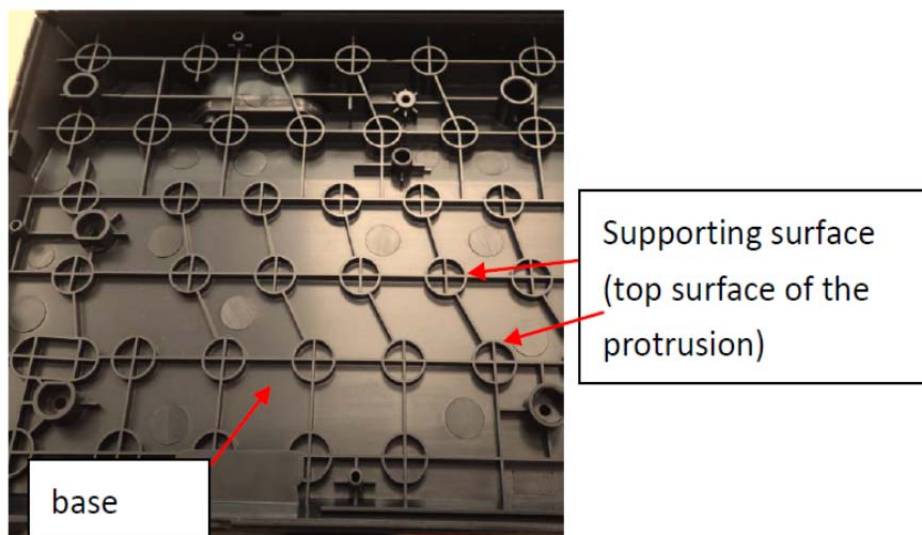


55. By way of further example, the Dell KB 216T also infringes Claim 14 of the '939 Patent because its base is integrally formed with its supporting surface:

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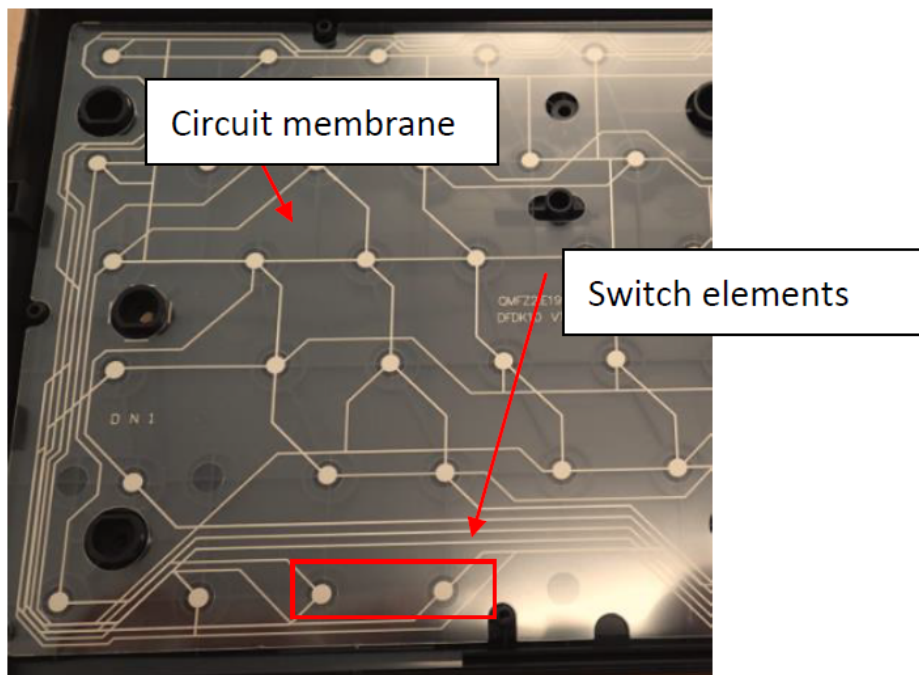


56. By way of further example, the Dell KB 216T also infringes Claim 15 of the '939 Patent because it is a keyboard assembly with a base having a supporting surface:

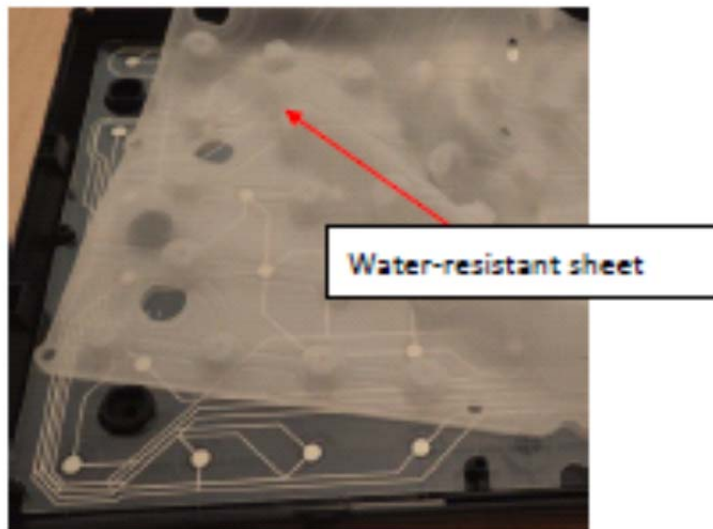


57. The Dell KB 216T also includes a circuit membrane mounted on the supporting surface having a plurality of switch elements:

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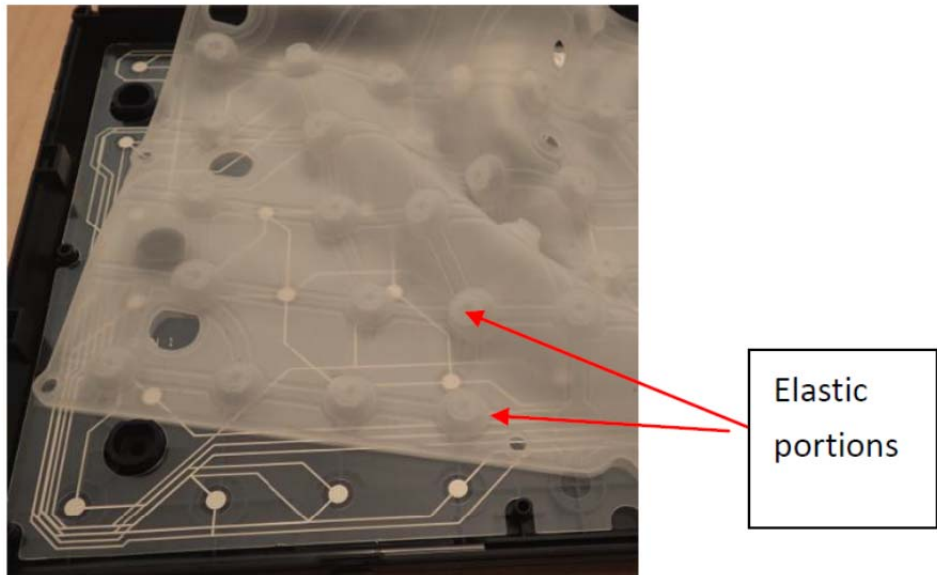


58. The Dell KB 216T also includes a water-resistant sheet covering the circuit membrane:

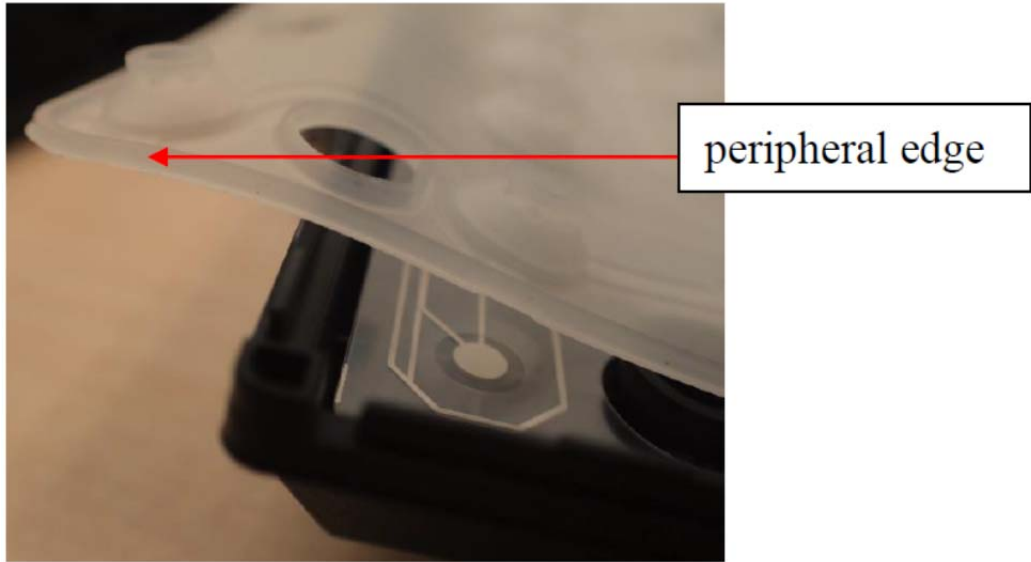


59. The water-resistant sheet of the Dell KB 216T has a plurality of elastic portions protruded therefrom, each of which is disposed corresponding to each of the switch elements:

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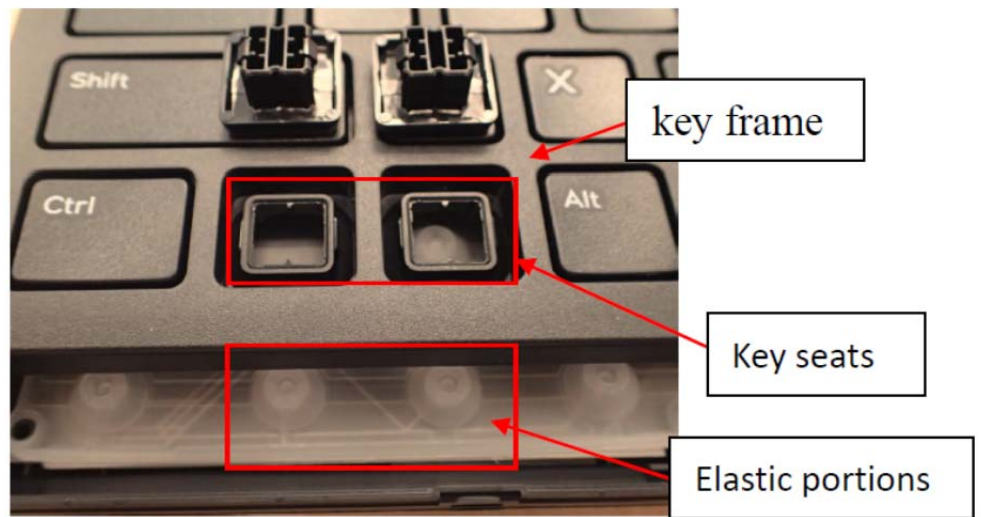


60. The water-resistant sheet of the Dell KB 216T also has a peripheral edge:

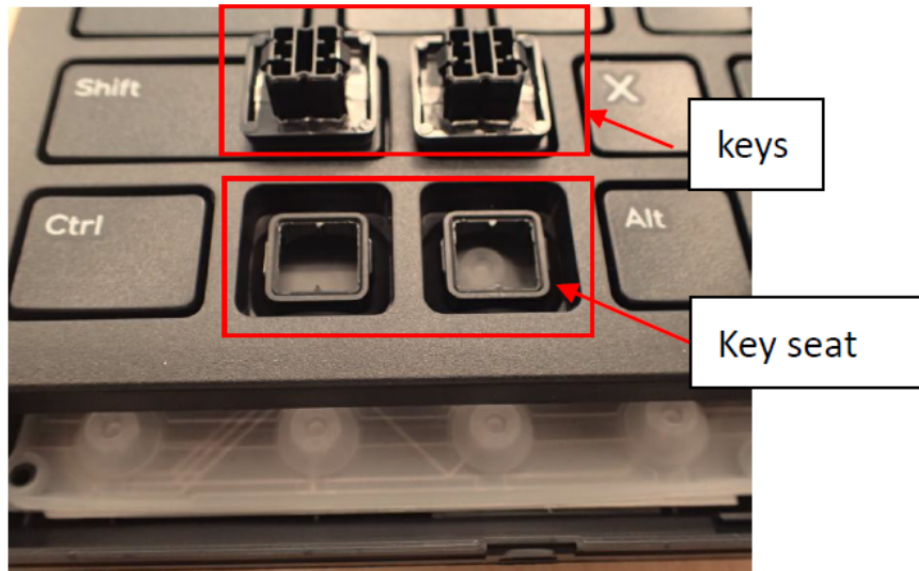


61. In addition, the Dell KB 216T includes a key frame above the water-resistant sheet with a plurality of key seats disposed corresponding to the elastic portions:

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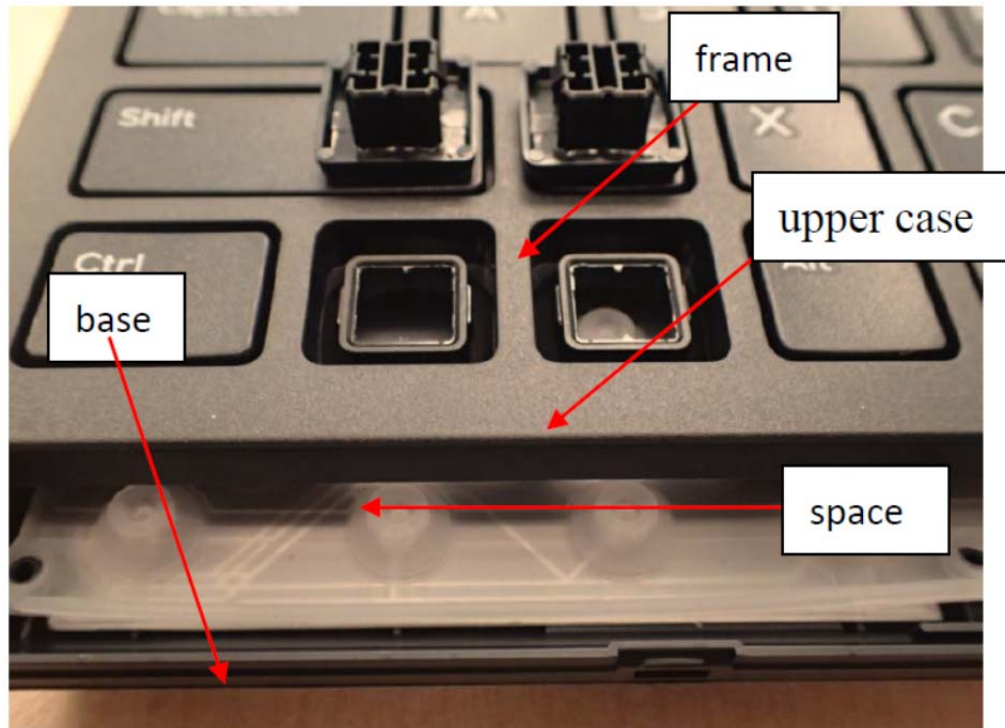


62. The Dell KB 216T includes a plurality of keys, each mounted on a respective key seat so that when a key is pressed down, its corresponding elastic portion is depressed to activate its associated switch element:

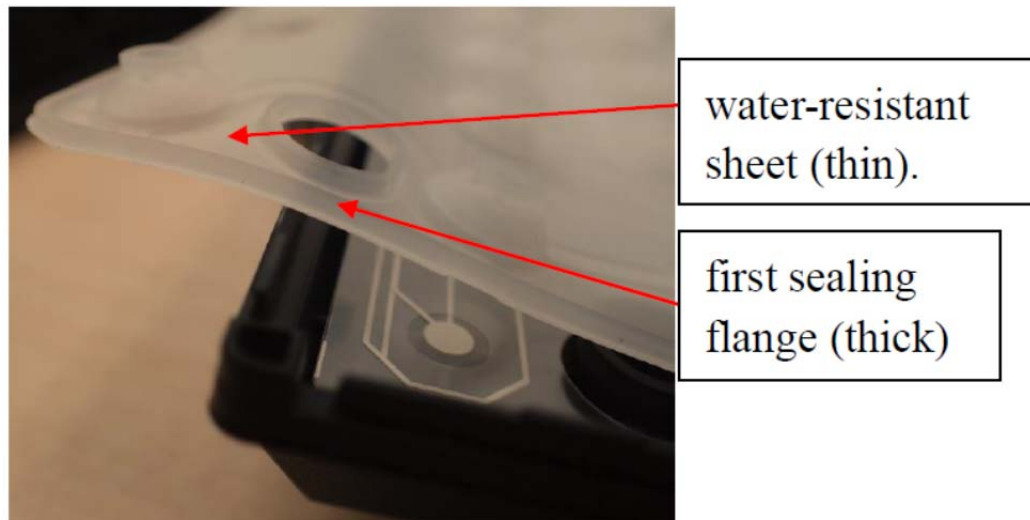


63. The Dell KB 216T also includes an upper case mounted on the base, wherein a space for collecting liquid is formed between the key frame and the water-resistant sheet, the space communicating with the plurality of key seats such that liquid entering the key seats flows into the space:

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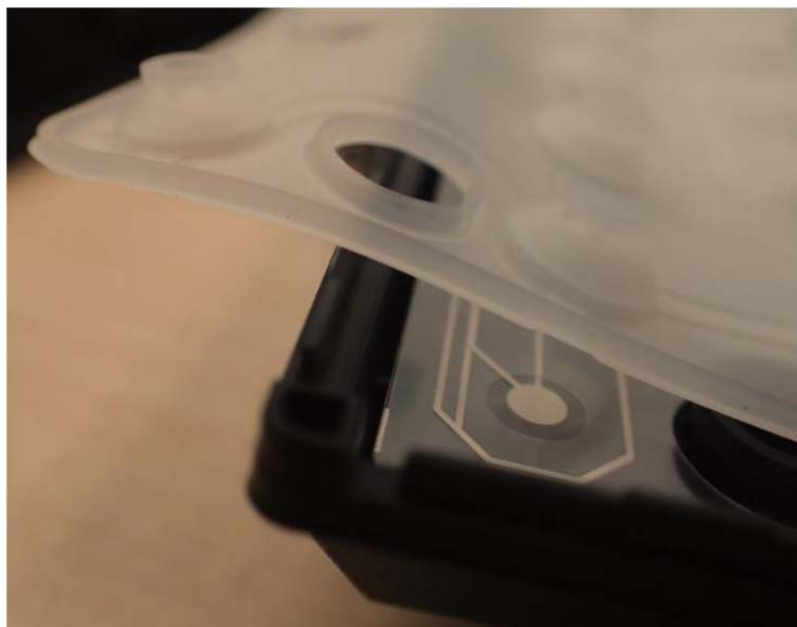


64. The Dell KB 216T also includes a first sealing flange mounted on the peripheral edge, thereby surrounding the water-resistant sheet:

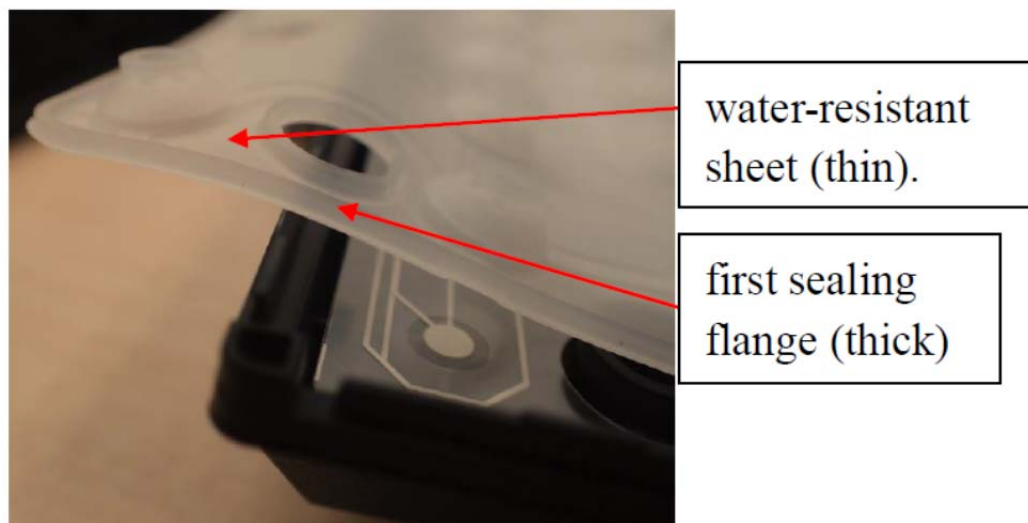


65. By way of further example, the Dell KB 216T infringes Claim 16 of the '939 Patent because the above-identified first sealing flange is integrally formed with the water-resistant sheet along the peripheral edge:

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66. By way of further example, the Dell KB 216T also infringes Claim 17 of the '939 Patent because the thickness of the first sealing flange is greater than the thickness of the water-resistant sheet:



67. Upon information and belief, the Dell KB 216T model computer keyboard (SC-KSK467, SK8123 US, 812-01017-00B) is manufactured by Defendants. Upon information and belief, the serial numbers on the Dell KB 216T correspond to Defendants' part numbers:



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8 68. By making, using, offering for sale, selling, and/or importing the '939 Accused
9 Products that infringe the '939 Patent, Defendants are liable to Darfon for direct infringement of the
10 '939 Patent pursuant to 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents.

11 69. In addition, on information and belief, Defendants have induced and continue to
12 induce infringement of one more claims of the '939 Patent, including but not limited to Claims 1-5,
13 9-11 and 13-17, pursuant to 35 U.S.C. § 271(b), by encouraging third parties such as users,
14 customers (e.g., Dell), distributors, wholesalers, retailers, affiliates, parents, subsidiaries, importers,
15 or sellers to make, use, offer to sell, sell, and/or import into the United States without authorization
16 the '939 Accused Products. The making, using, offering to sell, selling, and/or importing into the
17 United States constitutes direct infringement, literally or under the doctrine of equivalents, of one or
18 more claims of the '939 Patent by such third parties. Defendants' acts of inducement include:
19 providing the '939 Accused Products or components thereof to third parties and intending them to
20 make, use, offer to sell, sell, and/or import the '939 Accused Products; advertising the '939 Accused
21 Products in the United States; and encouraging the sale and offer for sale of the '939 Accused
22 Products by other entities (for example, https://us.liteon.com/en-global/Welcome/Landing_page and
23 https://us.liteon.com/en-global/Info/Liteon_trading). Upon information and belief, Defendants are
24 aware that third parties such as Dell offer the '939 Accused Products for sale in the United States.
25 For example, upon information and belief, third party Dell offers the Dell KB 216T for sale in the
26 United States at least through Amazon.com:
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The screenshot shows an Amazon product page for a Dell keyboard. At the top, there is an Amazon Alexa logo and a search bar with the text "Alexa, what's in my cart?". Below this, the breadcrumb navigation reads: Electronics > Computers & Accessories > Computer Accessories & Peripherals > Keyboards, Mice & Accessories > Keyboards. On the left side, there is a vertical gallery of five small images showing different views of the keyboard. The main image is a large, black, wired keyboard with a numeric keypad. To the right of the main image, the product title is "New 644G3 Genuine OEM Dell English Keyboard Slim QWERTY USB Wired Connection For Home Office FN Media Hot Keys Number Pad Model KB216T Universal US Typing Board Interface Port". Below the title, it says "Be the first to review this item". There is a section for "Available from these sellers." followed by a list of bullet points: "Original Genuine OEM Dell USB QWERTY Keyboard", "P/N: 644G3 0644G3 CN-0644G3", "Model: KB216T", "Language Layout: English QWERTY", and "Media FN Hot keys". Below the list, it says "New (1) from \$19.99 + \$8.69 shipping" and "Report incorrect product information." At the bottom right, there is another Alexa logo and the text "Alexa, what's in my cart? Ready when you are. Just ask. Learn more".

70. Defendants proceeded in this manner despite knowledge of the '939 Patent and their knowledge that specific actions they actively induced and continue to actively induce on the part of third parties constitute infringement of the '939 Patent. The Defendants had knowledge of the '939 Patent and the infringement of the '939 Patent no later than Lite-On's receipt of Darfon's October 25, 2017 letter, as described in Paragraphs 16-17. At the very least, because Defendants have been and remain on notice of the '939 Patent and the accused infringement, they have been and remain willfully blind regarding the infringement they have induced and continue to induce. Darfon and its licensees have also complied with the marking provisions of 35. U.S.C. § 271 by marking their products that practice the '939 Patent, either physically or through virtual marking, including at <http://www.darfon.com/English/patents.asp>, thus providing notice to potential infringers.

71. Darfon has suffered and continues to suffer damages and irreparable harm as a result of Defendants' infringement of the '939 Patent.

72. Defendants' infringement of the '939 Patent has been and continues to be willful, deliberate, and in disregard of Darfon's patent rights. The Defendants had knowledge of the '939 Patent and the infringement of the '939 Patent no later than Lite-On's receipt of Darfon's October 25, 2017 letter, as described in Paragraphs 16-17, and have proceeded to infringe the '939 Patent with full knowledge of that patent and its applicability to Defendants' products. Defendants' intentional, knowing, egregious, culpable, willful, wanton, malicious, bad faith, deliberate, consciously wrongful, and/or flagrant infringement entitles Darfon to increased damages under 35

1 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. §
2 285.

3 **COUNT II**

4 **INFRINGEMENT OF U.S. PATENT NO. 6,538,222**

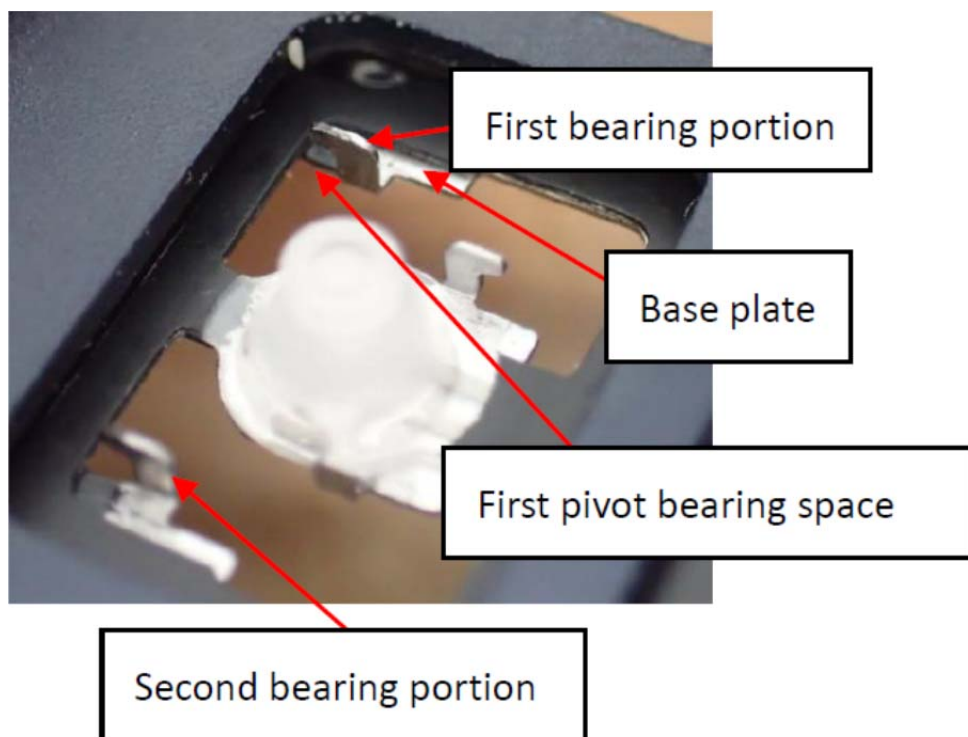
5 73. Plaintiff incorporates by reference Paragraphs 1 through 35 above as if fully set forth
6 herein.

7 74. Defendants make, use, offer for sale, sell, and/or import in the United States products
8 and/or services that have infringed and continue to infringe one or more claims of the '222 Patent,
9 including but not limited to Claims 13-22 and 24-28, pursuant to 35 U.S.C. § 271(a), literally or
10 under the doctrine of equivalents. Defendants' infringing products include, for example and without
11 limitation, all versions and variations, including predecessor and successor models, of the keyboard
12 of the ASUS Transformer T100 Chi 2-in-1 Detachable Laptop (SG-80300-XUA) ("ASUS T100 Chi
13 keyboard"), which, on information and belief, Defendants manufacture for ASUS, and any other
14 similar products that infringe at least one claim of the '222 Patent. Defendants' infringing products
15 are collectively referred to hereinafter as "the '222 Accused Products."

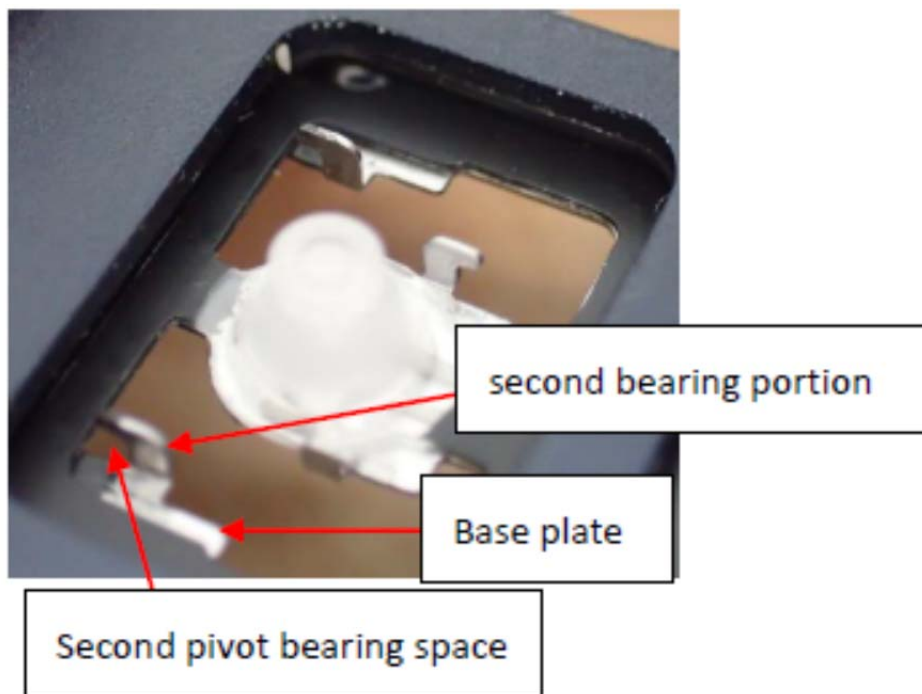
16 75. The '222 Accused Products are covered by one or more claims of the '222 Patent,
17 including at least Claims 13-22 and 24-28, because they contain each element of those claims.

18 76. By way of example, the ASUS T100 Chi keyboard infringes Claim 13 of the '222
19 Patent because it is a push button switch apparatus with a base plate having a first bearing portion, a
20 second bearing portion, and a first pivot bearing space formed between the base plate and first
21 bearing portion:
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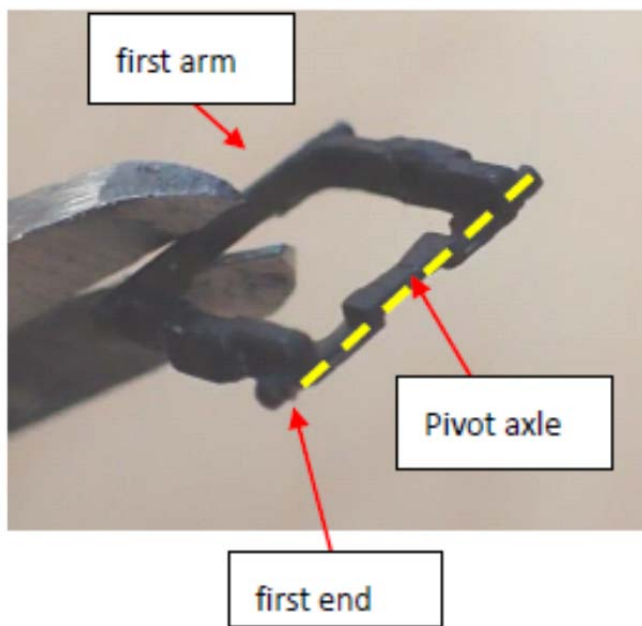


77. The ASUS T100 Chi keyboard also has a second bearing space formed between the base plate and the second bearing portion:

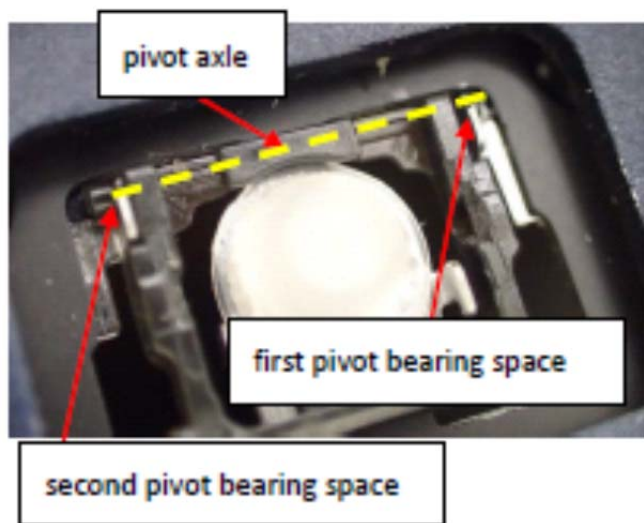


78. In addition, the ASUS T100 Chi keyboard has a first arm having a pivot axle at the first end:

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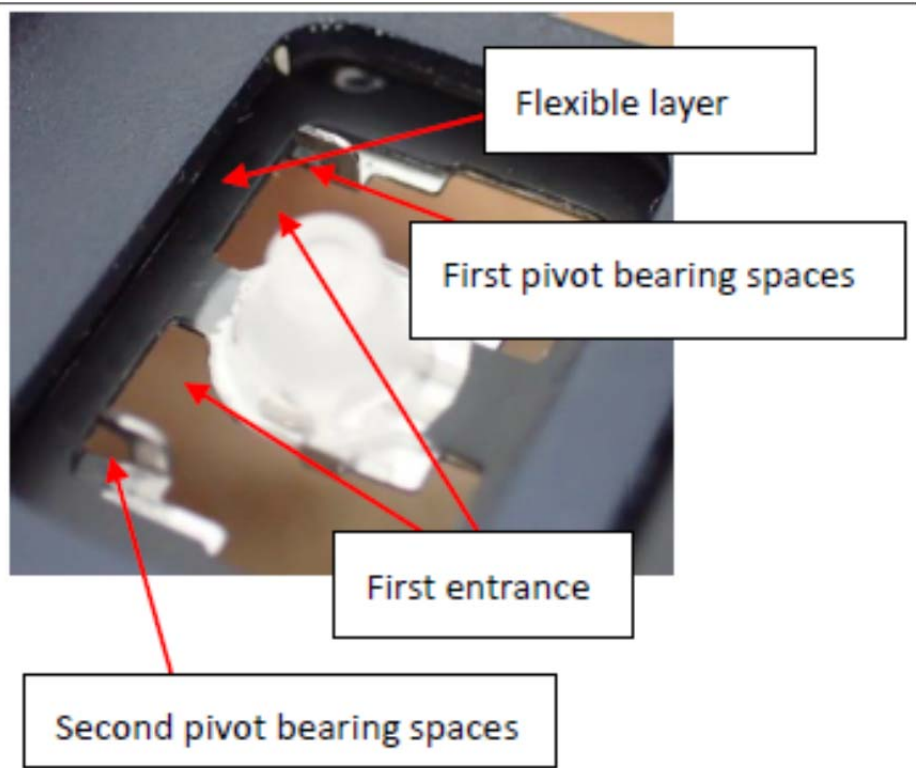


79. The pivot axle of the ASUS T100 Chi keyboard extends from the first end through both the first and second pivot bearing spaces:

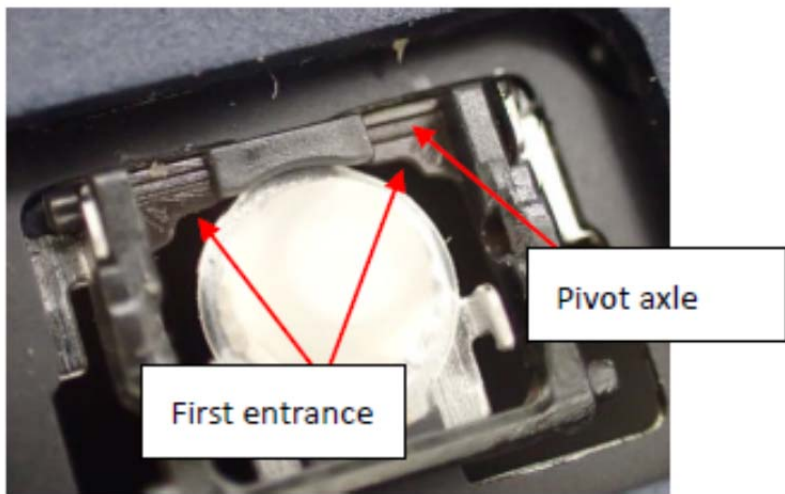


80. The ASUS T100 Chi keyboard also includes a flexible layer positioned on the base plate and having a first entrance partially overlapping with both the first and second pivot bearing spaces:

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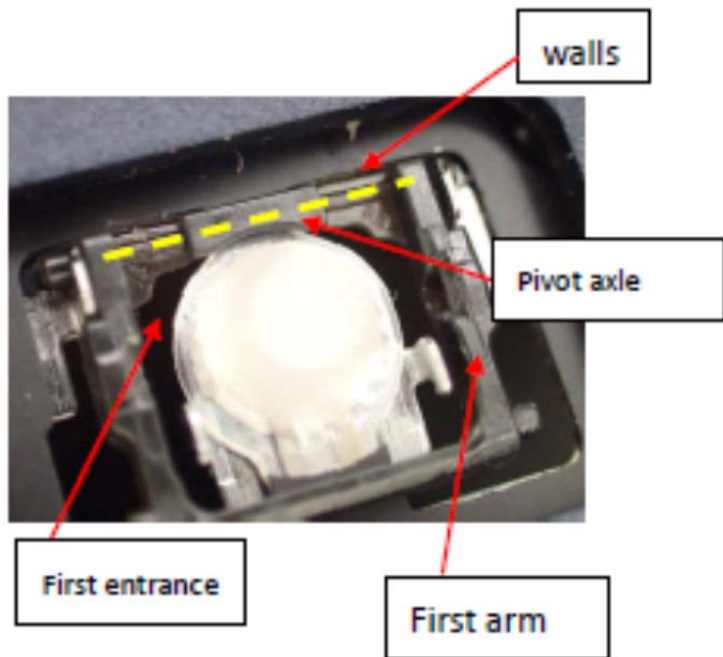


81. The pivot axle of the ASUS T100 Chi keyboard is positioned in the first entrance:

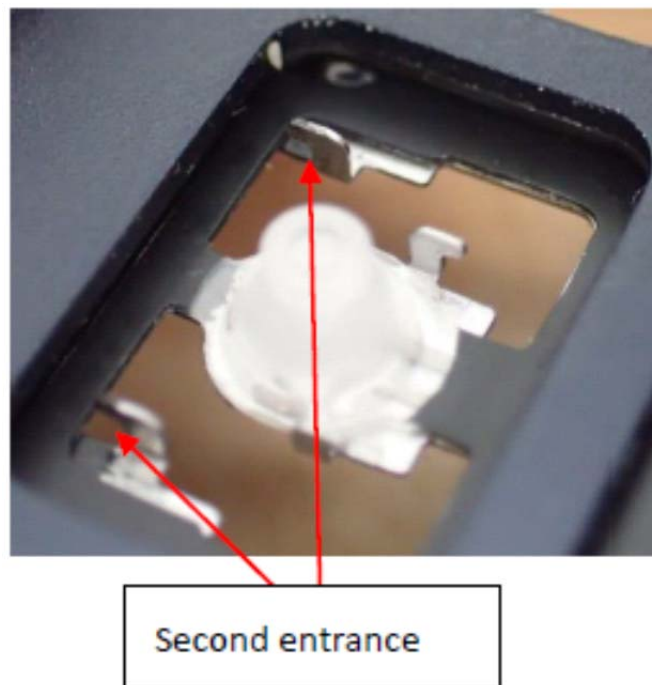


82. Finally, the walls defined by the first entrance of the ASUS T100 Chi keyboard constrain the pivot axle within the pivot bearing space, and the first arm selectively rotating along the pivot axle.

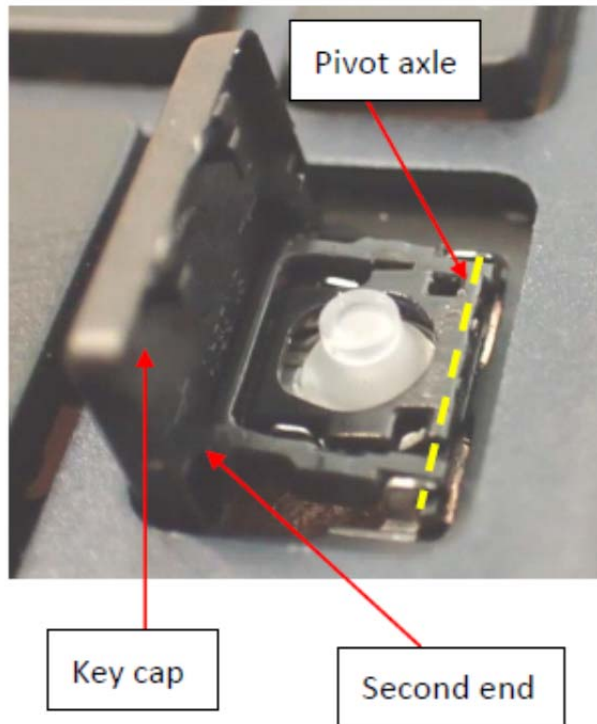
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83. By way of further example, the ASUS T100 Chi keyboard infringes Claim 14 of the '222 Patent because the first pivot bearing space includes a second entrance and the pivot axle enters into the first pivot bearing space through the second entrance:

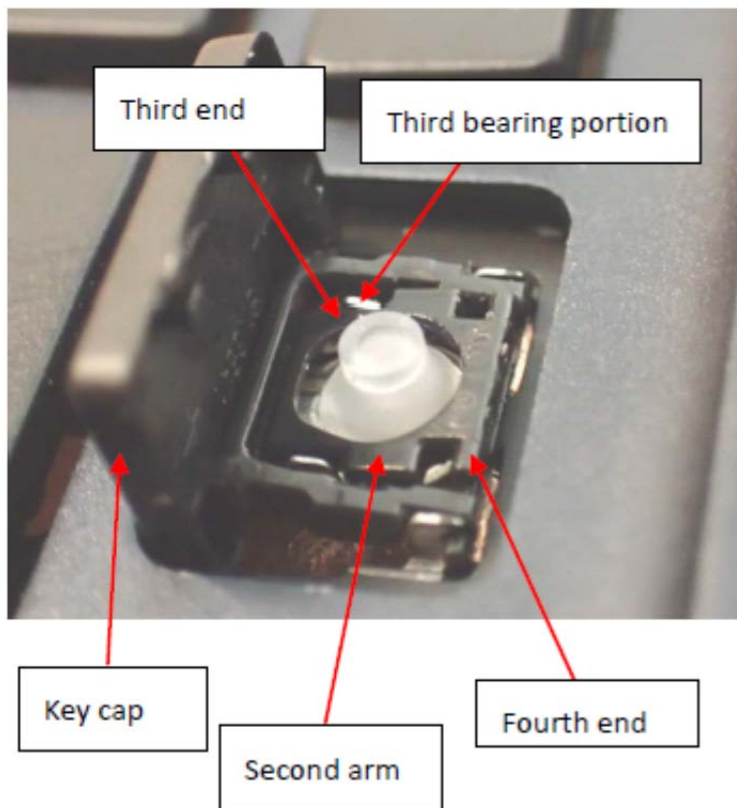


1 84. By way of further example, the ASUS T100 Chi keyboard infringes Claim 15 of the
2 '222 Patent because it includes a key cap connected to the second end of the first arm, the first arm
3 selectively rotating along the pivot axle in response to up-and-down movement of the key cap:

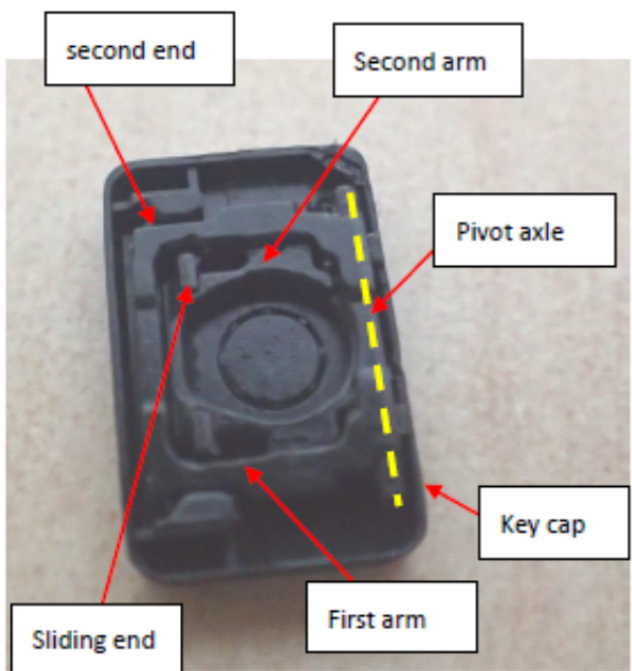


16 85. By way of further example, the ASUS T100 Chi keyboard infringes Claim 16 of the
17 '222 Patent because it has a second arm with a third end and a fourth end, where its base plate
18 comprises a third bearing portion connected to the third end, the fourth end is connected to the key
19 cap, and the second arm is connected to the first arm to constitute a scissors-like structure:

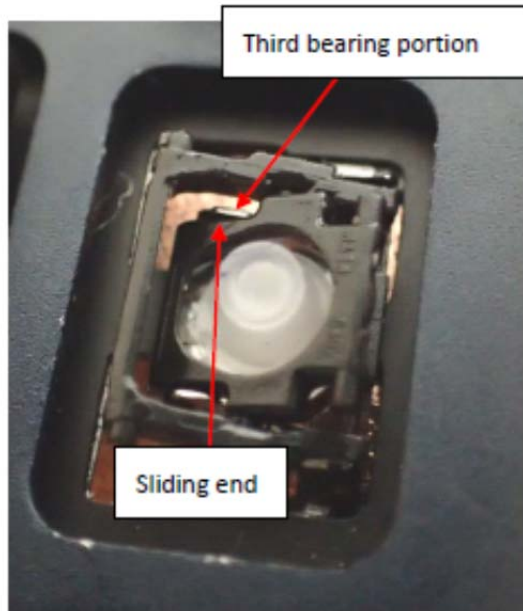
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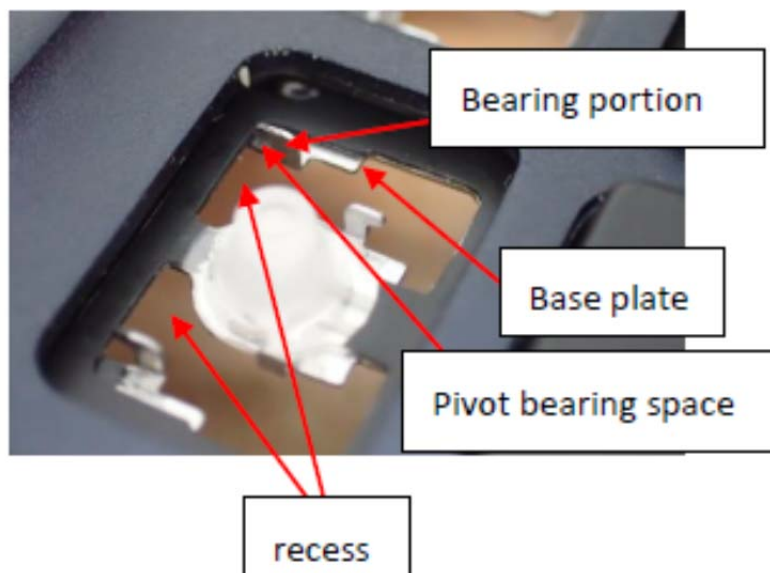
86. By way of further example, the ASUS T100 Chi keyboard infringes Claim 17 of the '222 Patent because it includes a second arm comprising a sliding end, and its first arm has a second end slidably connected to its key cap:



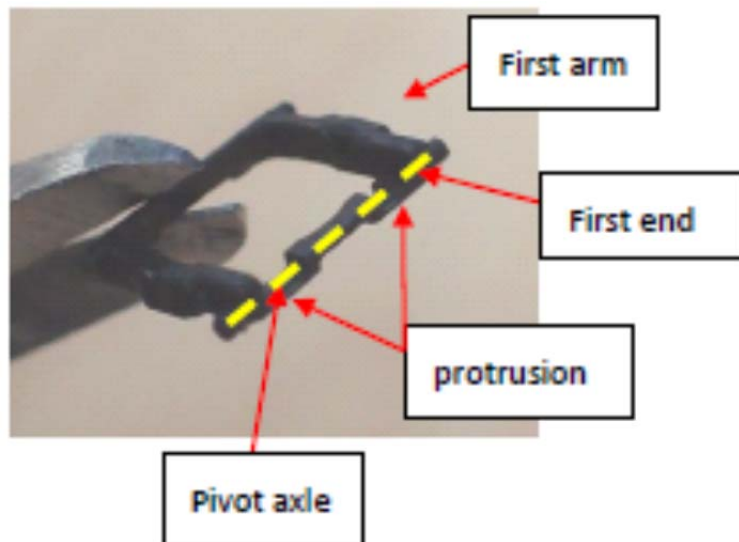
1 87. The ASUS T100 Chi keyboard also includes a base plate with a third bearing portion
2 slidably connected to the sliding end of the second arm, wherein the pivot axle is slidably rotatable
3 within the first bearing space and slides for a shorter horizontal distance than the sliding end of the
4 second arm in response to up-and-down motion of the key cap:



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16 88. By way of further example, the ASUS T100 Chi keyboard infringes Claim 18 of the
17 '222 Patent because it is a push button switch apparatus with a base plate having a bearing portion
18 and a recess, a pivot bearing space formed between the base plate and the bearing portion:



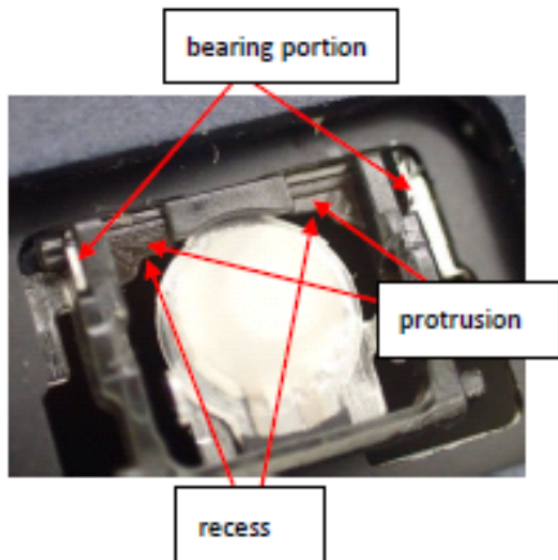
1 89. The ASUS T100 Chi keyboard also has a first arm with a pivot axle at a first end of
2 the first arm, the pivot axle having a protrusion:



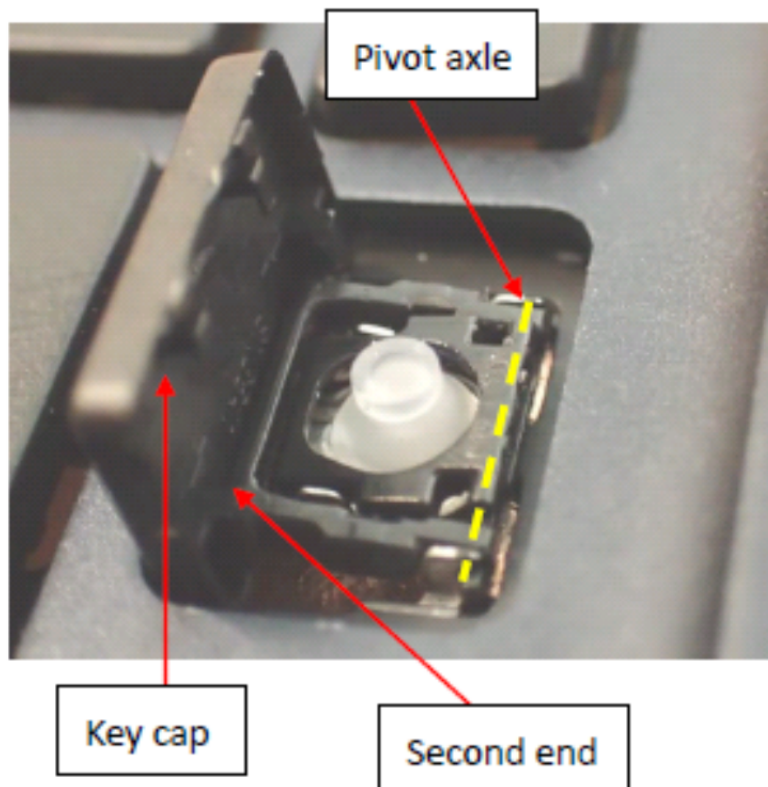
12 90. The protrusion of the ASUS T100 Chi keyboard is disposed in the recess but outside
13 a space beneath the bearing portion to enable the pivot axle to be retained within the pivot bearing
14 space:



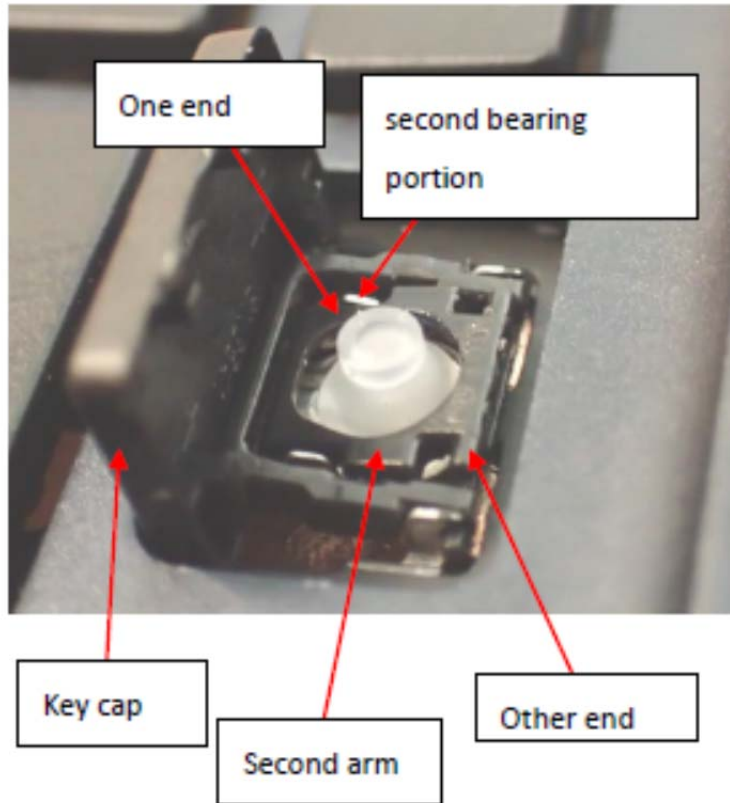
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91. By way of further example, the ASUS T100 Chi keyboard also infringes Claim 19 of the '222 Patent because it includes a key cap and its first arm comprises a second end connected to the key cap, the first arm selectively rotating along the pivot axle in response to up-and-down movement of the key cap:

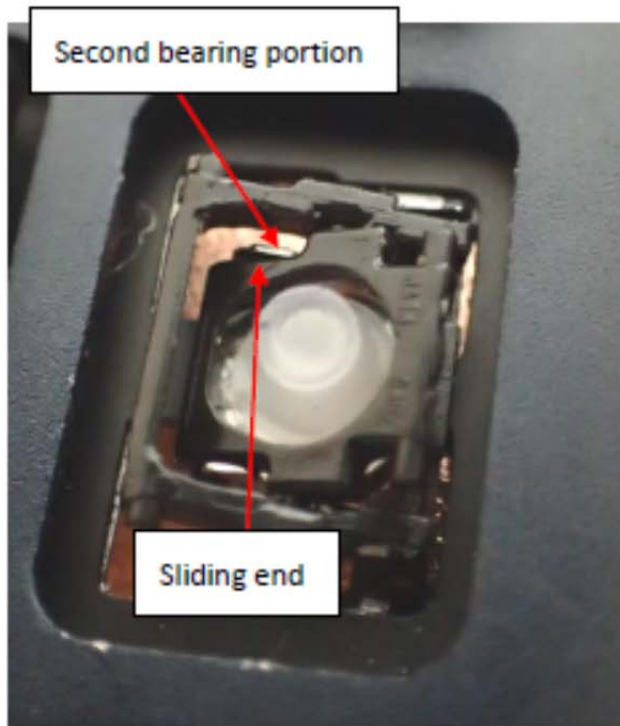
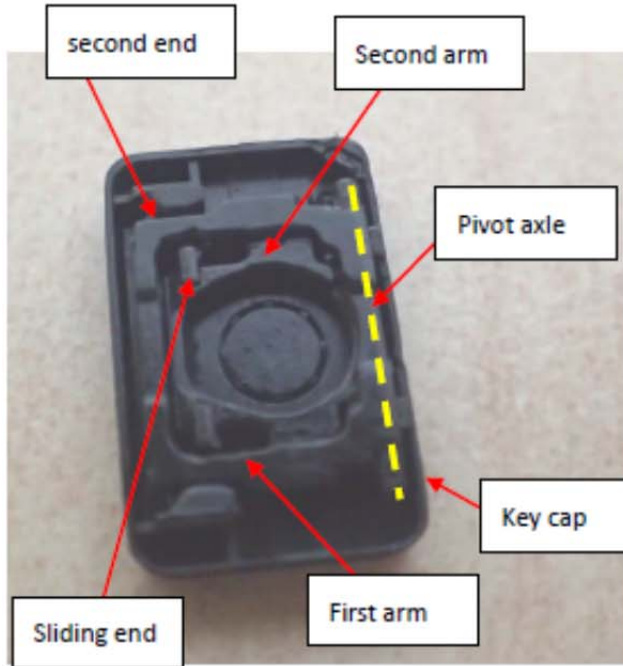


1 92. By way of further example, the ASUS T100 Chi keyboard also infringes Claim 20 of
 2 the '222 Patent because it includes a second arm, its base plate comprises a second bearing portion,
 3 and the second arm comprises two ends, wherein one end of the second arm is connected to the
 4 second bearing portion, the other end of the second arm is connected to the key cap, and the second
 5 arm is connected with the first arm to constitute a scissors-like structure:



20 93. By way of further example, the ASUS T100 Chi keyboard also infringes Claim 21 of
 21 the '222 Patent because it includes a key cap and a second arm, the second arm comprising a sliding
 22 end, a first arm comprising a second end slidably connected to the key cap, and a base plate
 23 comprising a second bearing portion slidably connected to the sliding end, wherein the pivot axle is
 24 slidably rotatable within the pivot bearing space and the pivot axle slides for a shorter horizontal
 25 distance than the sliding end of the second arm in response to up-and-down motion of the key cap:
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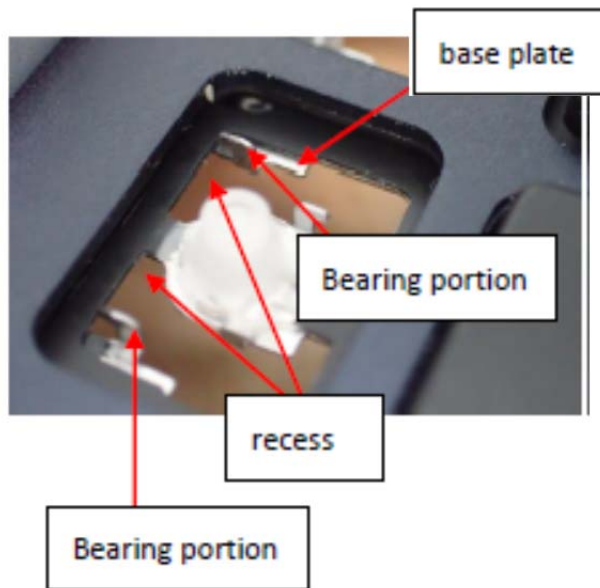
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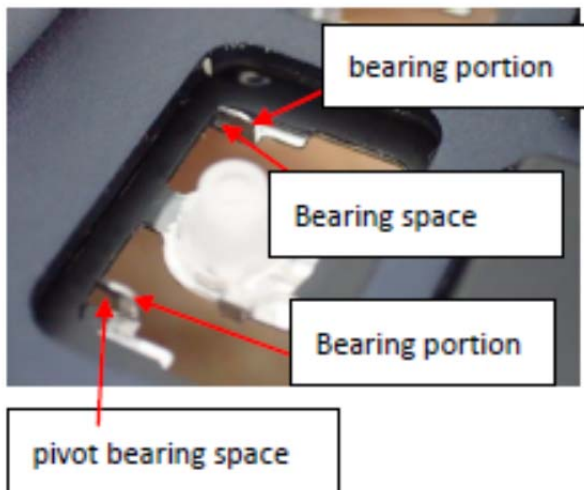


94. By way of further example, the ASUS T100 Chi keyboard also infringes Claim 22 of the '222 Patent because it is a switch button apparatus with a base plate having at least two bearing portions and a recess, wherein the recess is located between the two bearing portions:

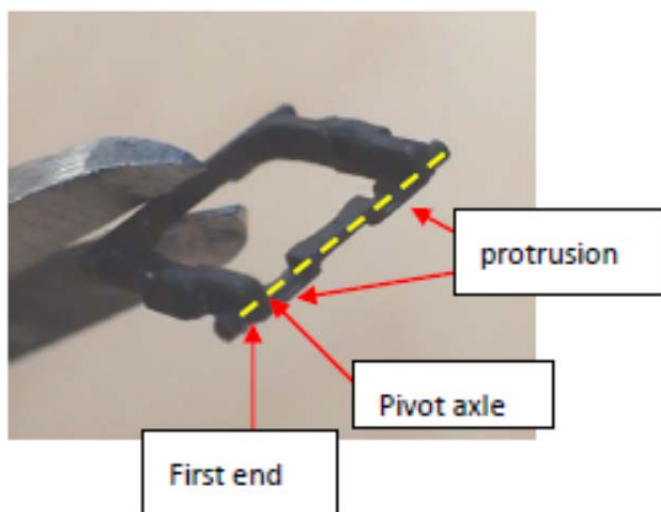


95. The ASUS T100 Chi keyboard also includes a bearing space formed between the base plate and each bearing portion:

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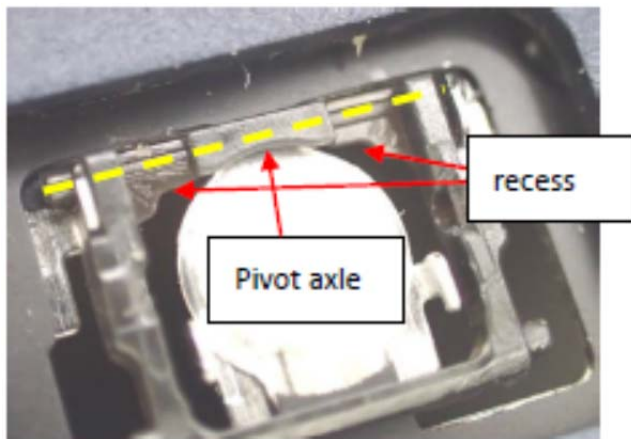
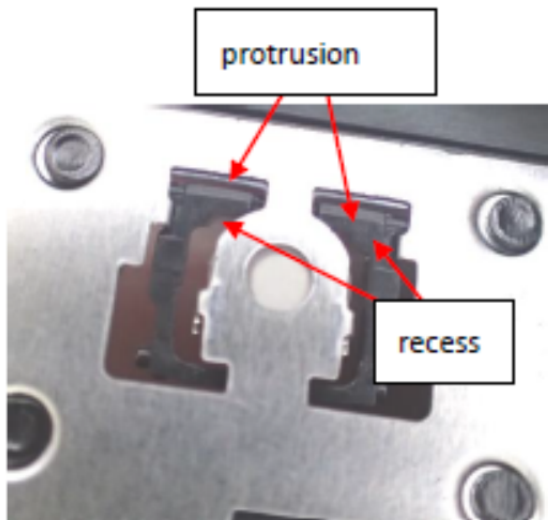


96. The ASUS T100 Chi keyboard also includes a first arm having a pivot axle at a first end of the first arm, the pivot axle having a protrusion:



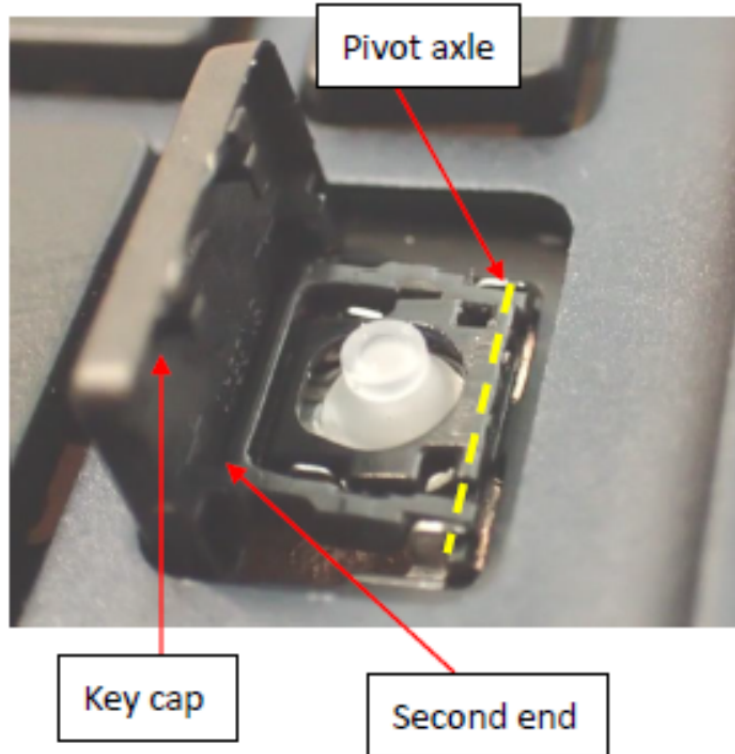
97. The protrusion of the ASUS T100 Chi keyboard is disposed in the recess to enable the pivot axle to be retained within the pivot bearing space:

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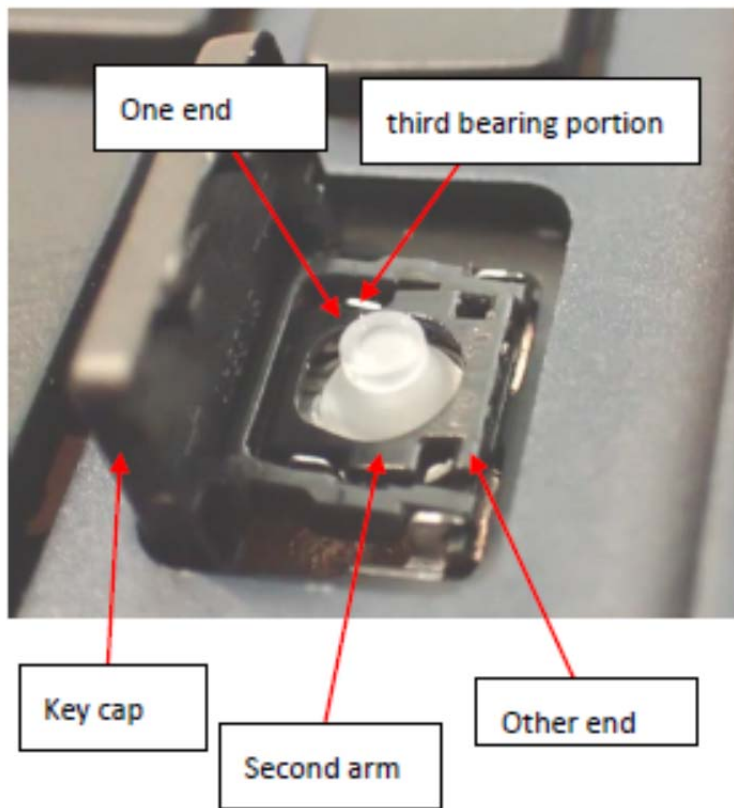
98. By way of further example, the ASUS T100 Chi keyboard infringes Claim 24 of the '222 Patent because it includes a key cap, a first arm comprising a second end connected to the key cap, and the first arm selectively rotating along the pivot axle in response to up-and-down movement of the key cap:

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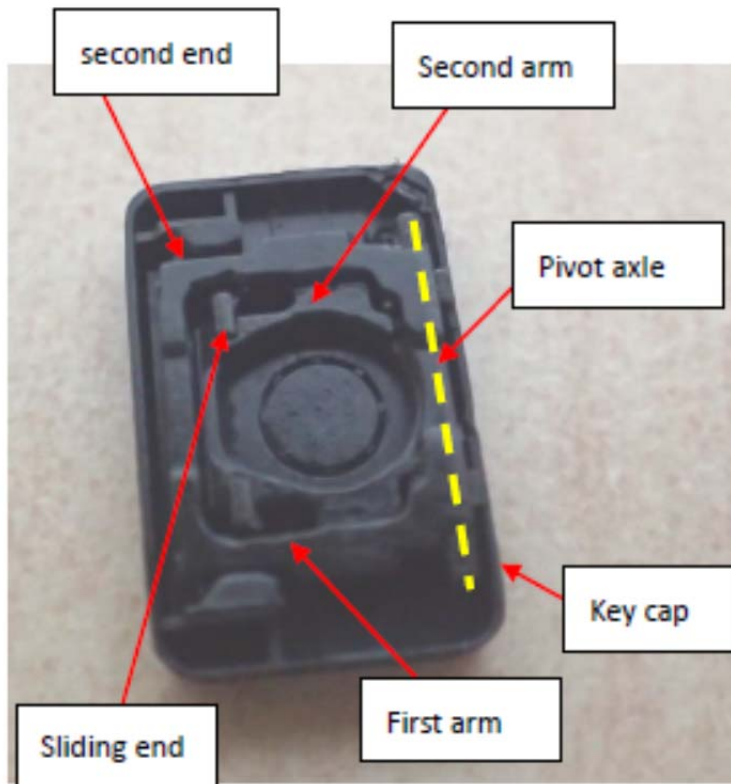
99. By way of further example, the ASUS T100 Chi keyboard infringes Claim 25 of the '222 Patent because it includes a second arm, its base plate also comprises a third bearing portion, and the second arm comprises two ends, wherein one end of the second arm is connected to the third bearing portion, the other end of the second arm is connected to the key cap, and the second arm is connected to the first arm to constitute a scissors-like structure:

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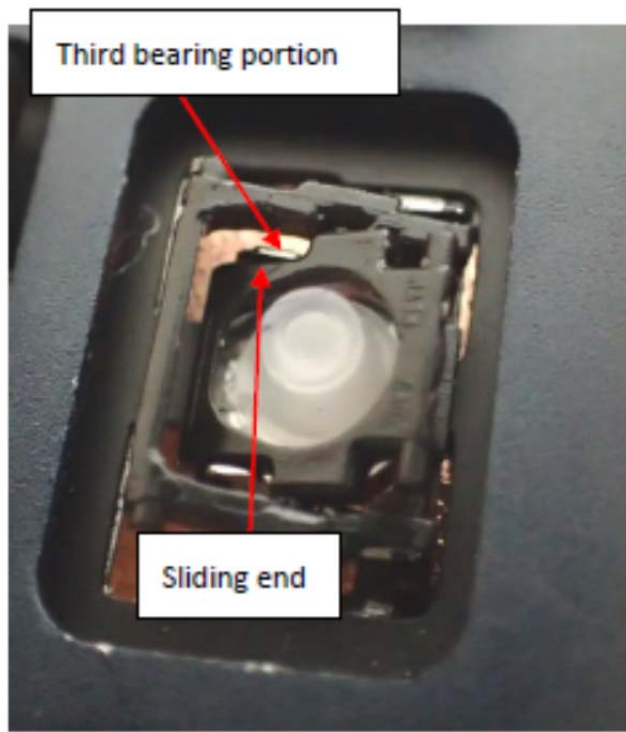
100. By way of further example, the ASUS T100 Chi keyboard infringes Claim 26 of the '222 Patent because it includes a key cap and a second arm, the second arm comprising a sliding end, and a first arm comprising a second end slidably connected to the key cap:

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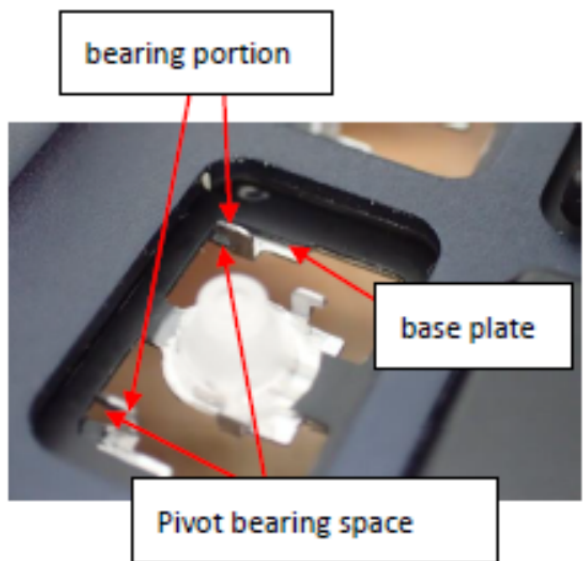
101. The ASUS T100 Chi keyboard also includes a baseplate comprising a third bearing portion slidably connected to the sliding end, wherein the pivot axle is slidably rotatable within the pivot bearing space and the pivot axle slides for a shorter horizontal distance than the sliding end of the second arm in response to up-and-down motion of the key cap:

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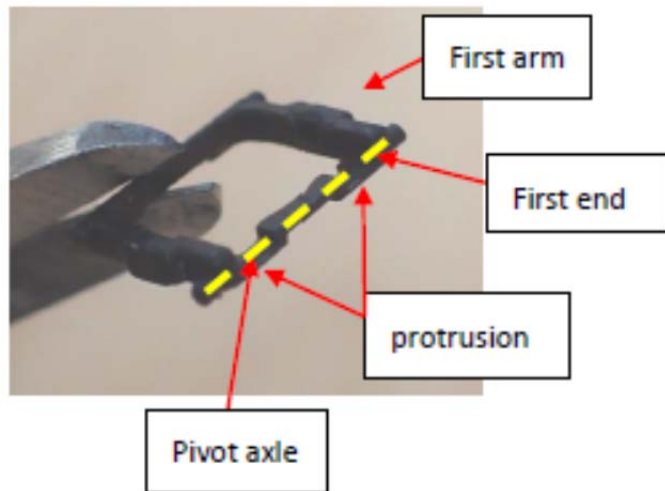


102. By way of further example, the ASUS T100 Chi keyboard also infringes Claim 27 of the '222 Patent because it is a push button switch apparatus with a base plate having at least two bearing portions, a pivot bearing space being formed between the base plate and each bearing portion:

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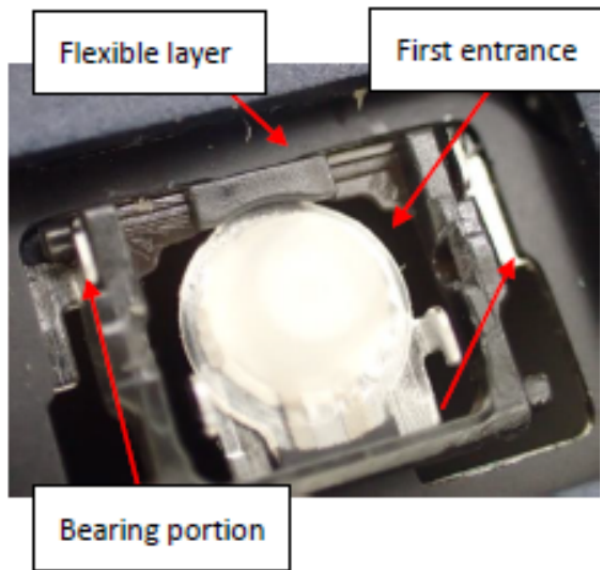


103. The ASUS T100 Chi keyboard also includes a first arm having a pivot axle at a first end of the first arm, the pivot axle having a protrusion:

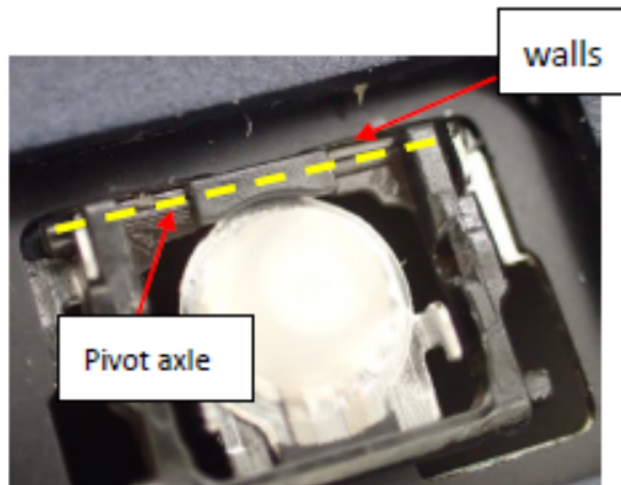


104. The ASUS T100 Chi keyboard also includes a flexible layer positioned on the base plate with a first entrance located between the two bearing portions and the protrusion being positioned in the first entrance:

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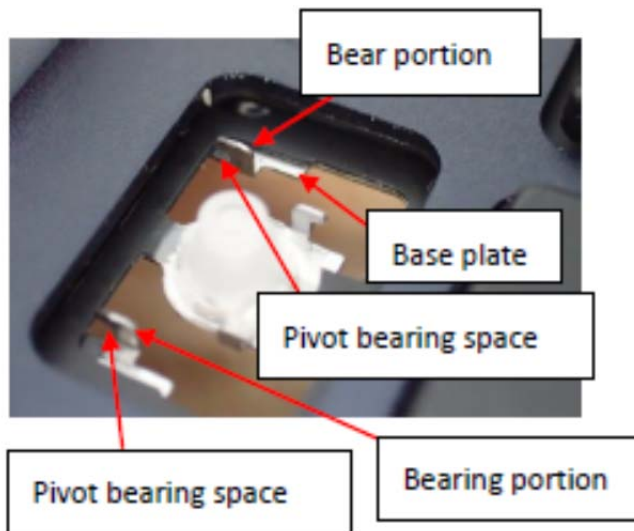


105. The ASUS T100 Chi keyboard also has walls defined by the first entrance that constrain the pivot axle being movable within the pivot bearing space:

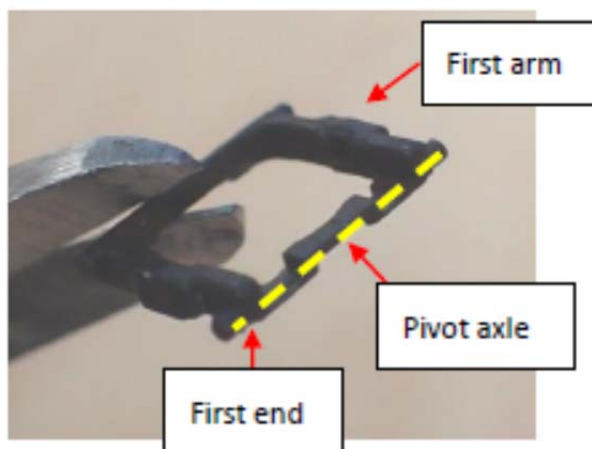


106. By way of further example, the ASUS T100 Chi keyboard infringes Claim 28 of the '222 Patent because it includes a base plate having at least two bearing portions and a pivot bearing space formed between the base plate and each bearing portion:

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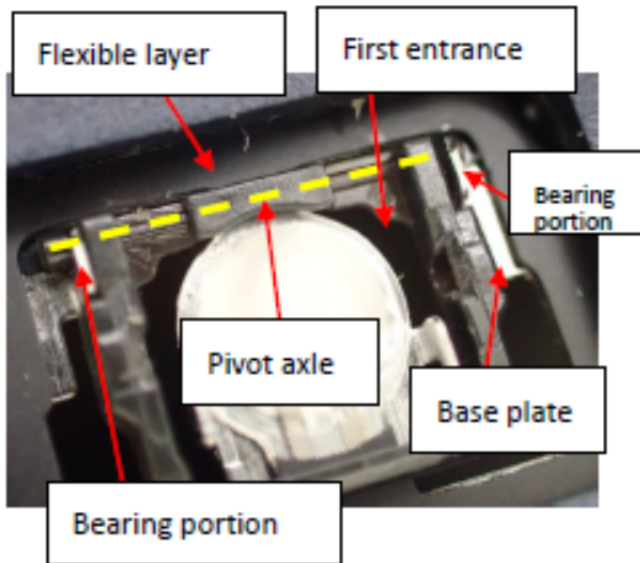


107. The ASUS T100 Chi keyboard also has a first arm having a pivot axle at a first end:

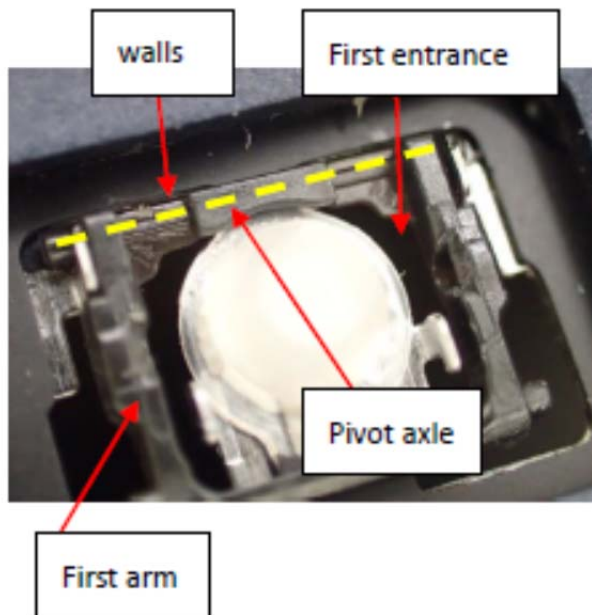


108. The ASUS T100 Chi keyboard also has a flexible layer positioned on the base plate, having a first entrance located between the two bearing portions and the pivot axle being positioned in the first entrance:

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109. Finally, the ASUS T100 Chi keyboard has walls defined by the first entrance that constrain the pivot axle within the pivot bearing space, and the first arm selectively rotating along the pivot axle:



110. Upon information and belief, the ASUS T100 Chi keyboard is manufactured by Defendants. Upon information and belief, the serial numbers on the ASUS T100 Chi keyboard, including at least SG-80300-XUA, correspond to Defendants' part numbers:



111. By making, using, offering for sale, selling, and/or importing the '222 Accused Products that infringe the '222 Patent, Defendants are liable to Darfon for direct infringement of the '222 Patent pursuant to 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents.

112. In addition, on information and belief, Defendants have induced and continue to induce infringement of one more claims of the '222 Patent, including but not limited to Claims 13-22 and 24-28, pursuant to 35 U.S.C. § 271(b), by encouraging third parties such as users, customers (e.g., ASUS), distributors, wholesalers, retailers, affiliates, parents, subsidiaries, importers, or sellers to make, use, offer to sell, sell, and/or import into the United States without authorization the '222 Accused Products. The making, using, offering to sell, selling, and/or importing into the United States constitutes direct infringement, literally or under the doctrine of equivalents, of one or more claims of the '222 Patent by such third parties. Defendants' acts of inducement include: providing the '222 Accused Products or components thereof to third parties and intending them to make, use, offer to sell, sell, and/or import the '222 Accused Products; advertising the '222 Accused Products in the United States; and encouraging the sale and offer for sale of the '222 Accused Products by other entities (for example, https://us.liteon.com/en-global/Welcome/Landing_page and https://us.liteon.com/en-global/Info/Liteon_trading). Upon information and belief, Defendants are aware that third parties such as ASUS offer the '222 Accused Products for sale in the United States. For example, upon information and belief, third party ASUS offers the ASUS T100 Chi for sale in the United States at least through Amazon.com:



113. Defendants proceeded in this manner despite knowledge of the '222 Patent and their knowledge that specific actions they actively induced and continue to actively induce on the part of third parties constitute infringement of the '222 Patent. The Defendants had knowledge of the '222 Patent and the infringement of the '222 Patent no later than Lite-On's receipt of Darfon's July 16, 2012 letter, as described in Paragraph 21 . At the very least, because Defendants have been and remain on notice of the '222 Patent and the accused infringement, they have been and remain willfully blind regarding the infringement they have induced and continue to induce. Darfon and its licensees have also complied with the marking provisions of 35. U.S.C. § 271 by marking their products that practice the '222 Patent, either physically or through virtual marking, including at <http://www.darfon.com/English/patents.asp>, thus providing notice to potential infringers.

114. Darfon has suffered and continues to suffer damages and irreparable harm as a result of Defendants' infringement of the '222 Patent.

115. Defendants' infringement of the '222 Patent has been and continues to be willful, deliberate, and in disregard of Darfon's patent rights. The Defendants had knowledge of the '222 Patent and the infringement of the '222 Patent no later than July 16, 2012, as described in Paragraph 21, and have proceeded to infringe the '222 Patent with full knowledge of that patent and its applicability to Defendants' products. Defendants' intentional, knowing, egregious, culpable, willful, wanton, malicious, bad faith, deliberate, consciously wrongful, and/or flagrant infringement entitles

1 Darfon to increased damages under 35 U.S.C. § 284 and to attorneys’ fees and costs incurred in
2 prosecuting this action under 35 U.S.C. § 285.

3 **COUNT III**

4 **INFRINGEMENT OF U.S. PATENT NO. 6,633,012**

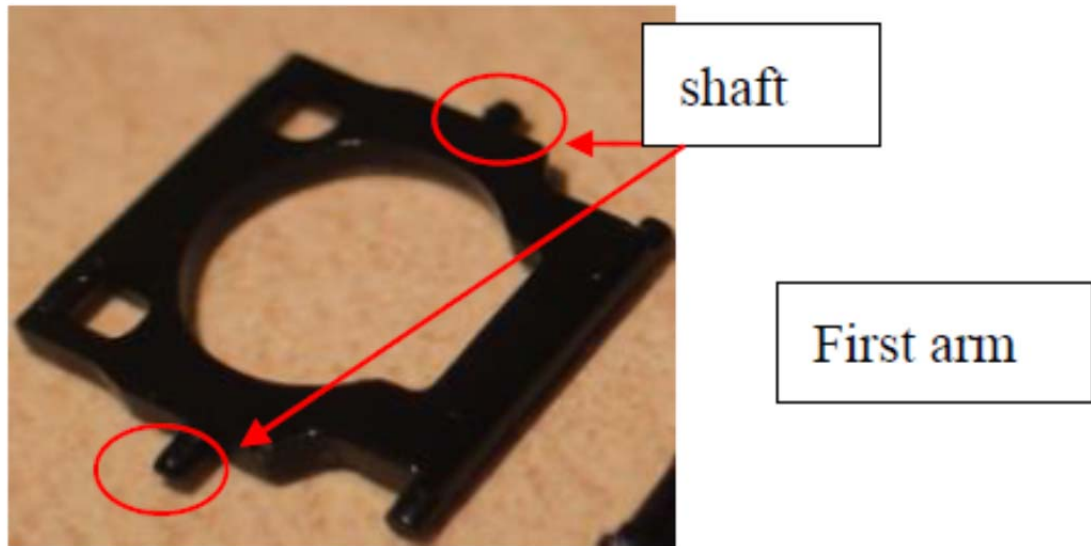
5 116. Plaintiff incorporates by reference Paragraphs 1 through 35 above as if fully set forth
6 herein.

7 117. Defendants make, use, offer for sale, sell, and/or import in the United States products
8 and/or services that have infringed and continue to infringe one or more claims of the ’012 Patent,
9 including but not limited to Claim 1 pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of
10 equivalents. Defendants’ infringing products include, for example and without limitation, all
11 versions and variations, including predecessor and successor models, of the keyboard of the ASUS
12 Transformer T100 Chi 2-in-1 Detachable Laptop (SG-80300-XUA) (“ASUS T100 Chi keyboard”),
13 which, on information and belief, Defendants manufacture for ASUS, and any other similar products
14 that infringe at least one claim of the ’012 Patent. Defendants’ infringing products are collectively
15 referred to hereinafter as “the ’012 Accused Products.”

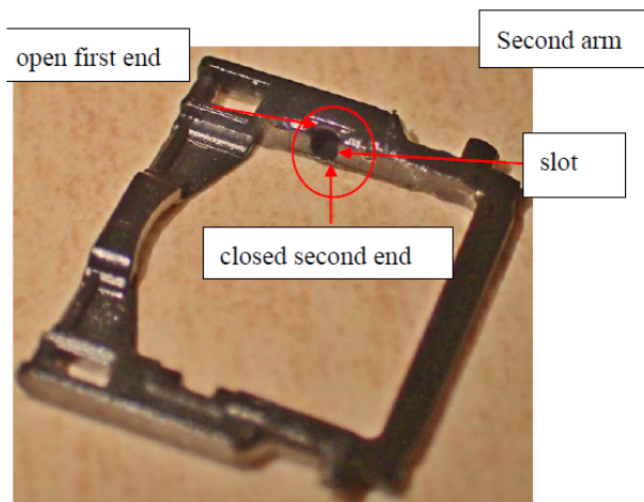
16 118. The ’012 Accused Products are covered by one or more claims of the ’012 Patent,
17 including at least Claim 1, because they contain each element of those claims.

18 119. By way of example, the ASUS T100 Chi keyboard infringes Claim 1 of the ’012
19 Patent because it is a key device with a first arm having a shaft:
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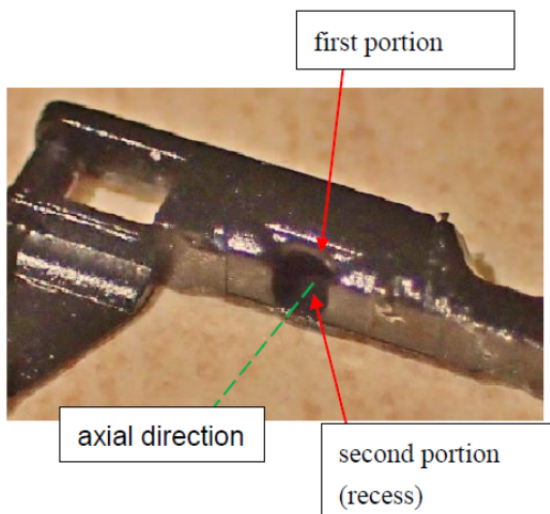
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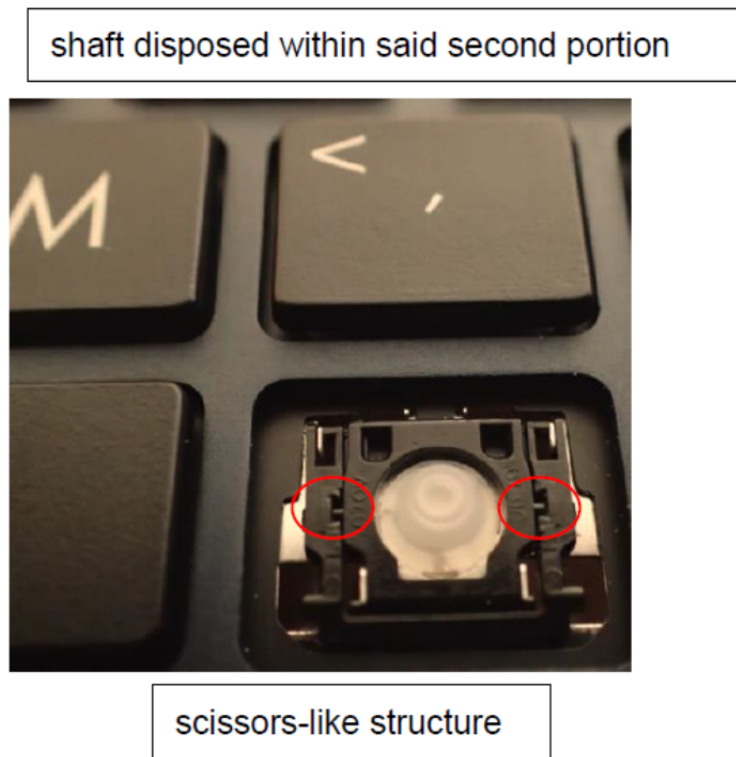
120. In addition, the ASUS T100 Chi keyboard includes a second arm having a slot with an open first end and a closed second end, the slot comprising a first portion and a second portion, the first portion communicating the second portion, and the second portion defining an axial direction, wherein the length of the first portion along the axial direction is substantially shorter than the shaft:



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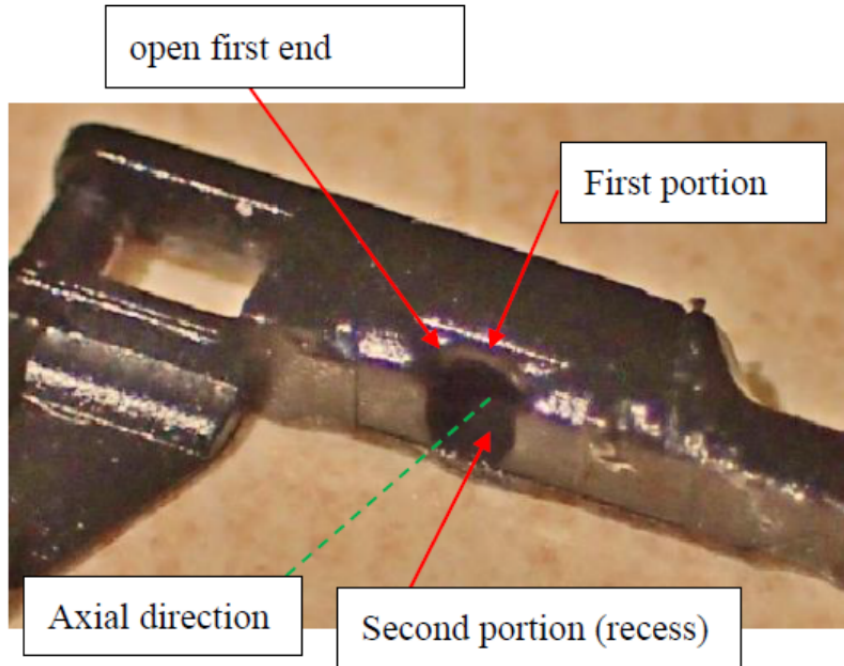


121. Further, the ASUS T100 Chi keyboard's first arm and second arm form a scissors-like structure with the shaft disposed within the second portion:



122. Finally, while the ASUS T100 Chi keyboard's first arm is being assembled to the second arm, the shaft is first disposed into the first portion via the open first end, then the shaft slides along the first portion and the shaft is further pushed into the second portion along the axial direction:

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123. Upon information and belief, the ASUS T100 Chi keyboard is manufactured by Defendants. Upon information and belief, the serial numbers on the ASUS T100 Chi keyboard correspond to Defendants' part numbers:



124. By making, using, offering for sale, selling, and/or importing the '012 Accused Products that infringe the '012 Patent, Defendants are liable to Darfon for direct infringement of the '012 Patent pursuant to 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents.

125. In addition, on information and belief, Defendants have induced and continue to induce infringement of one more claims of the '012 Patent, including but not limited to Claim 1, pursuant to 35 U.S.C. § 271(b), by encouraging third parties such as users, customers (e.g., ASUS), distributors, wholesalers, retailers, affiliates, parents, subsidiaries, importers, or sellers to make, use, offer to sell, sell, and/or import into the United States without authorization the '012 Accused

1 Products. The making, using, offering to sell, selling, and/or importing into the United States
 2 constitutes direct infringement, literally or under the doctrine of equivalents, of one or more claims
 3 of the '012 Patent by such third parties. Defendants' acts of inducement include: providing the '012
 4 Accused Products or components thereof to third parties and intending them to make, use, offer to
 5 sell, sell, and/or import the '012 Accused Products; advertising the '012 Accused Products in the
 6 United States; and encouraging the sale and offer for sale of the '012 Accused Products by other
 7 entities (for example, https://us.liteon.com/en-global/Welcome/Landing_page and
 8 https://us.liteon.com/en-global/Info/Liteon_trading). Upon information and belief, Defendants are
 9 aware that third parties such as ASUS offer the '012 Accused Products for sale in the United States.
 10 For example, upon information and belief, third party ASUS offers the ASUS T100 Chi for sale in
 11 the United States at least through Amazon.com:



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 21 126. Defendants proceeded in this manner despite knowledge of the '012 Patent and their
 22 knowledge that specific actions they actively induced and continue to actively induce on the part of
 23 third parties constitute infringement of the '012 Patent. The Defendants had knowledge of the '012
 24 Patent and the infringement of the '012 Patent no later than the date of service of this Complaint, as
 25 described in Paragraph 24. Darfon and its licensees have also complied with the marking provisions
 26 of 35. U.S.C. § 271 by marking their products that practice the '012 Patent, either physically or
 27 through virtual marking, including at <http://www.darfon.com/English/patents.asp>, thus providing
 28 notice to potential infringers.

1 127. Darfon has suffered and continues to suffer damages and irreparable harm as a result
2 of Defendants' infringement of the '012 Patent.

3 **COUNT IV**

4 **INFRINGEMENT OF U.S. PATENT NO. 6,860,612**

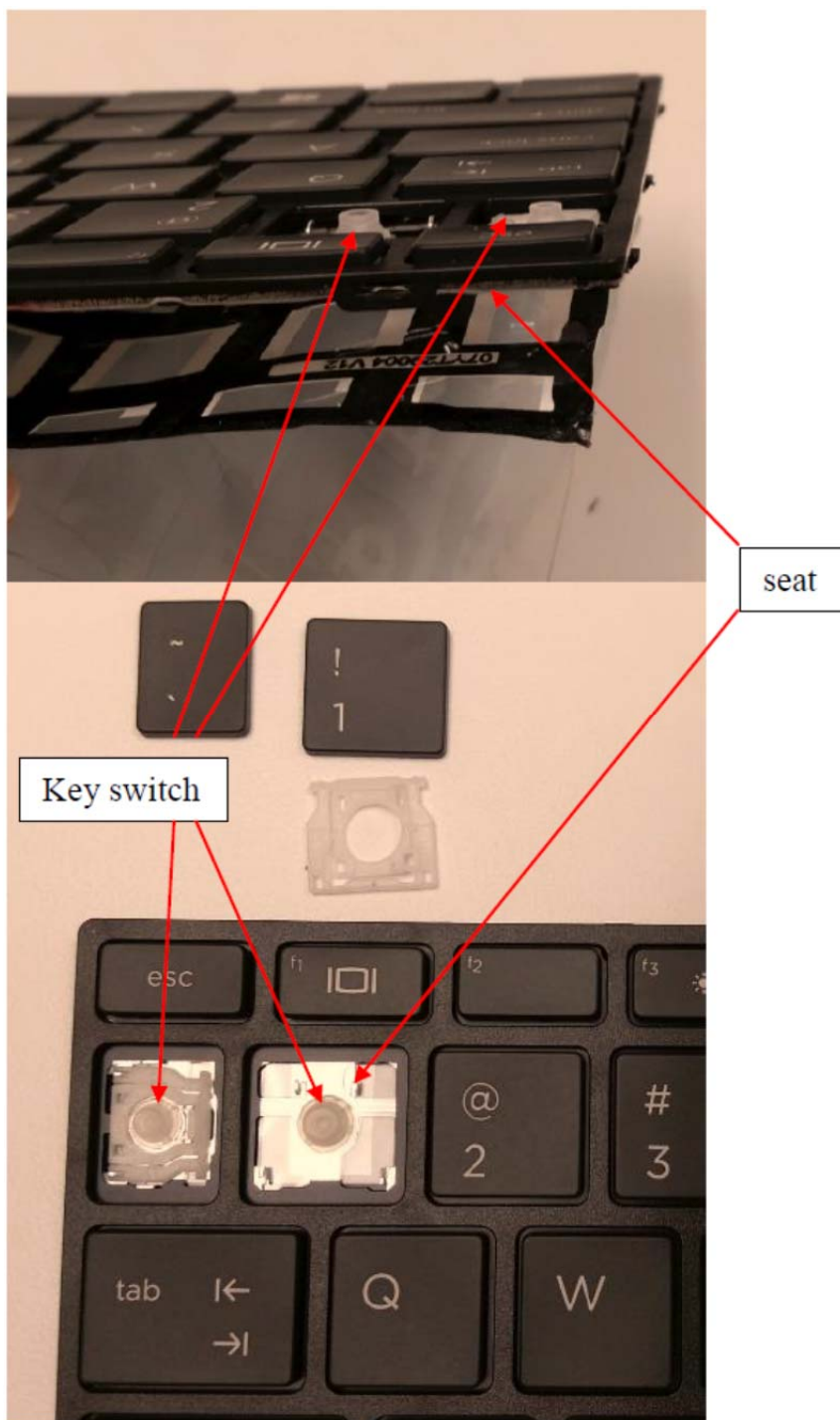
5 128. Plaintiff incorporates by reference Paragraphs 1 through 35 above as if fully set forth
6 herein.

7 129. Defendants make, use, offer for sale, sell, and/or import in the United States products
8 and/or services that have infringed and continue to infringe one or more claims of the '612 Patent,
9 including but not limited to Claims 1, 5, 8, 9, 11, 17, 21, 22, 29, 32, 34 and 35 pursuant to 35 U.S.C.
10 § 271(a), literally or under the doctrine of equivalents. Defendants' infringing products include, for
11 example and without limitation, all versions and variations, including predecessor and successor
12 models, of the HP ProBook 440 G5 keyboard (SG-87710-XUA) ("HP ProBook 440 G5 keyboard"),
13 which, on information and belief, Defendants manufacture for HP, and any other similar products
14 that infringe at least one claim of the '612 Patent. Defendants' infringing products are collectively
15 referred to hereinafter as "the '612 Accused Products."

16 130. The '612 Accused Products are covered by one or more claims of the '612 Patent,
17 including at least Claims 1, 5, 8, 9, 11, 17, 21, 22, 29, 32, 34, and 35 because they contain each
18 element of those claims.

19 131. By way of example, the HP ProBook 440 G5 keyboard infringes Claim 1 of the '612
20 Patent because it is an illuminated keyboard with a key switch including a seat:
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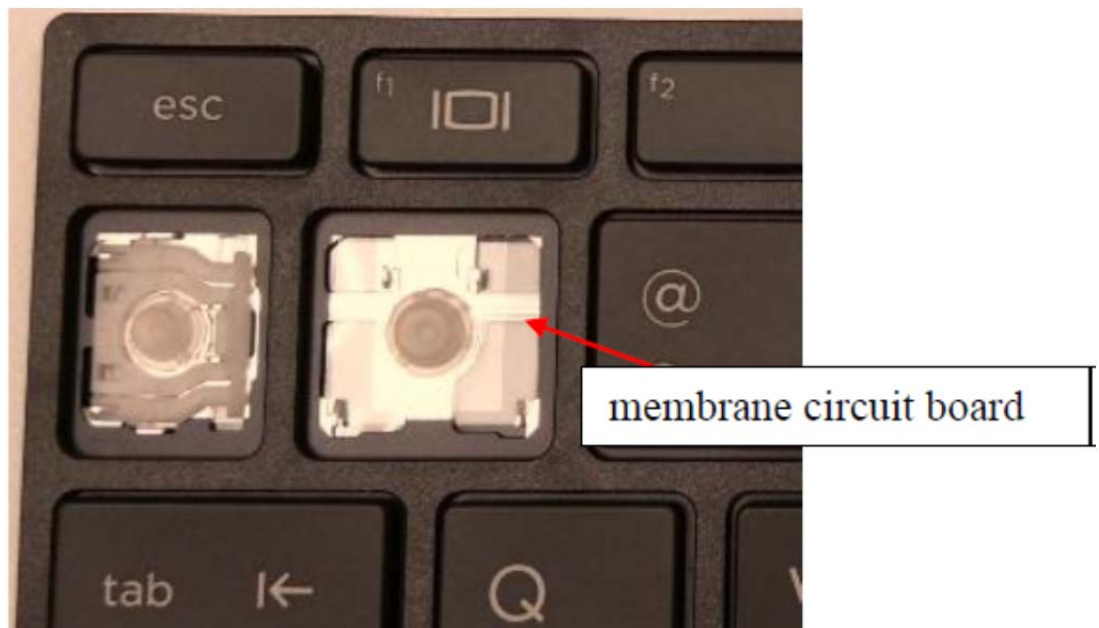


132. The HP ProBook 440 G5 keyboard also includes a fixed member:

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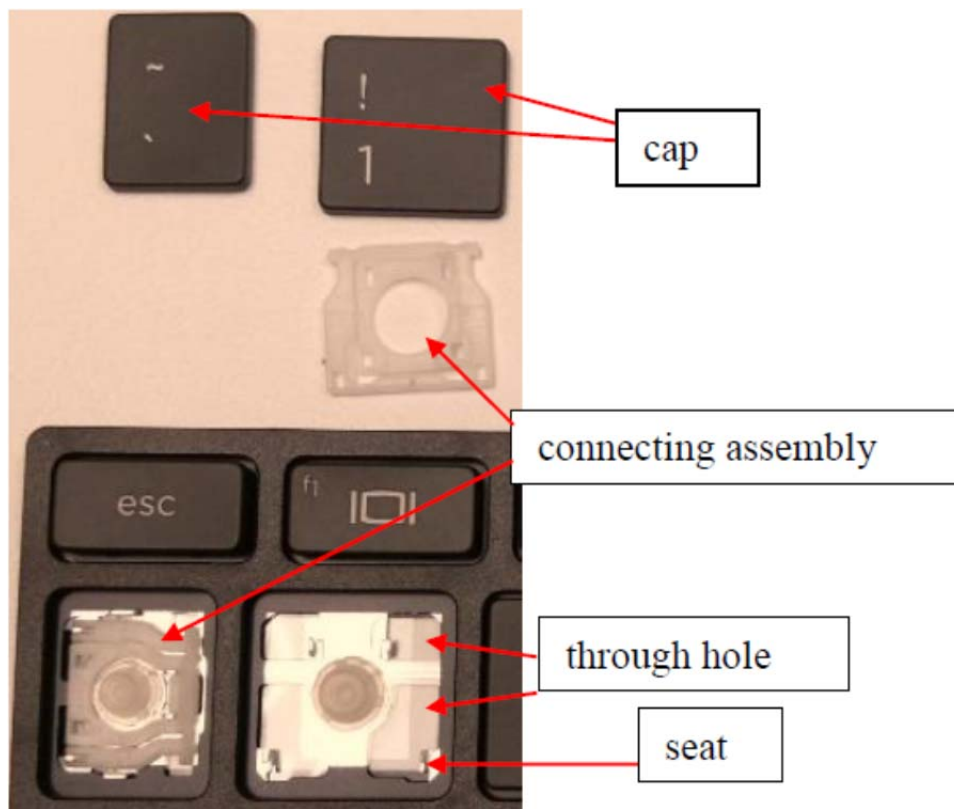


133. The HP ProBook 440 G5 keyboard also includes a membrane circuit board:

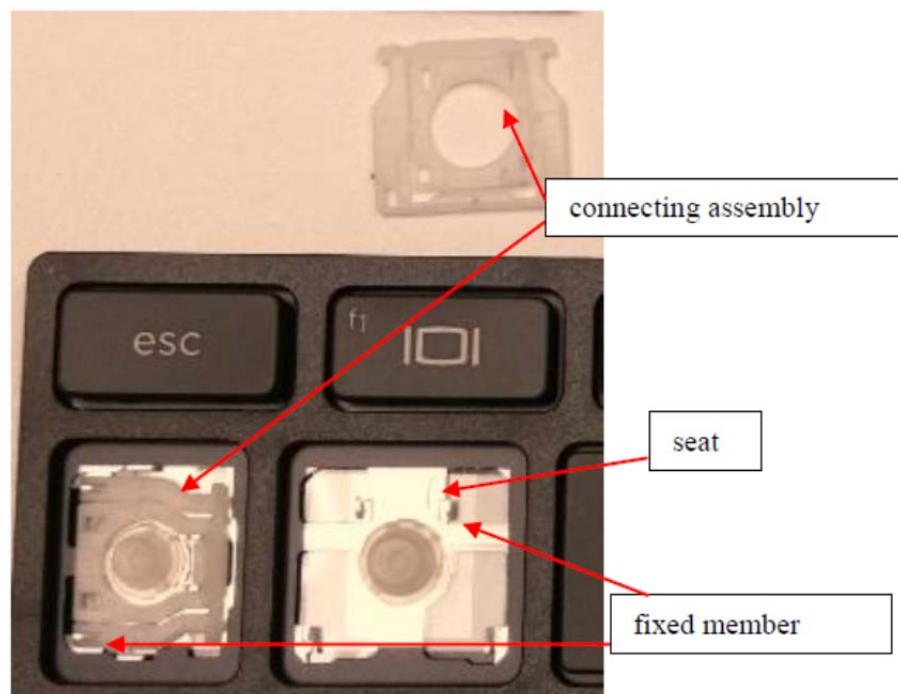


134. The HP ProBook 440 G5 keyboard also includes a connecting assembly and a cap, wherein the seat includes a through hole corresponding to the cap:

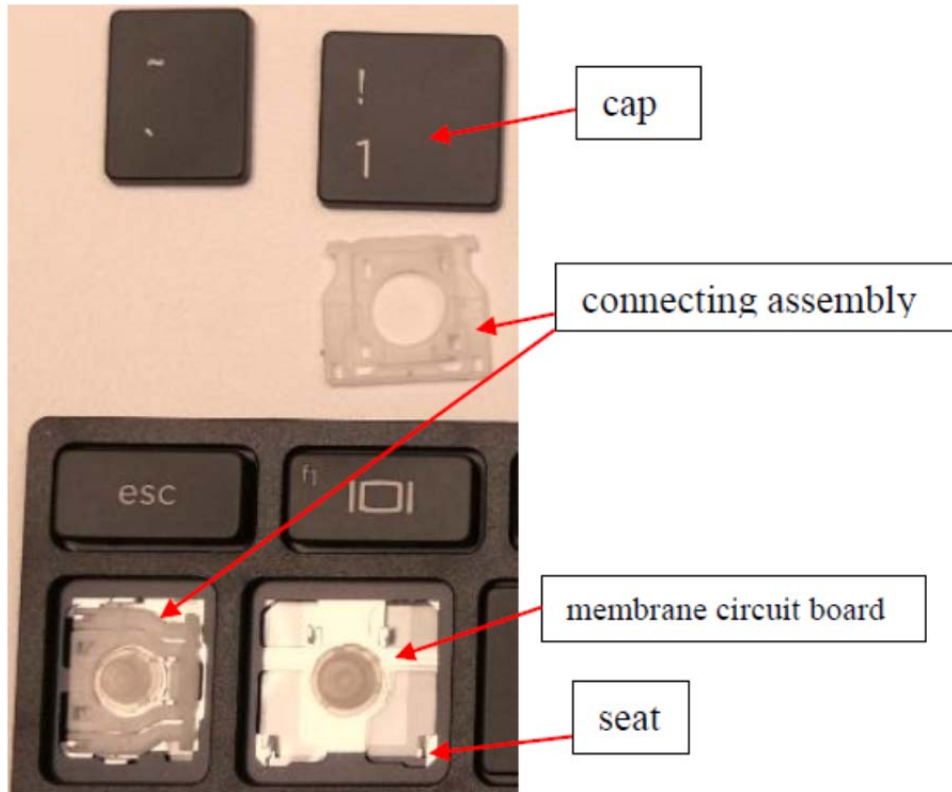
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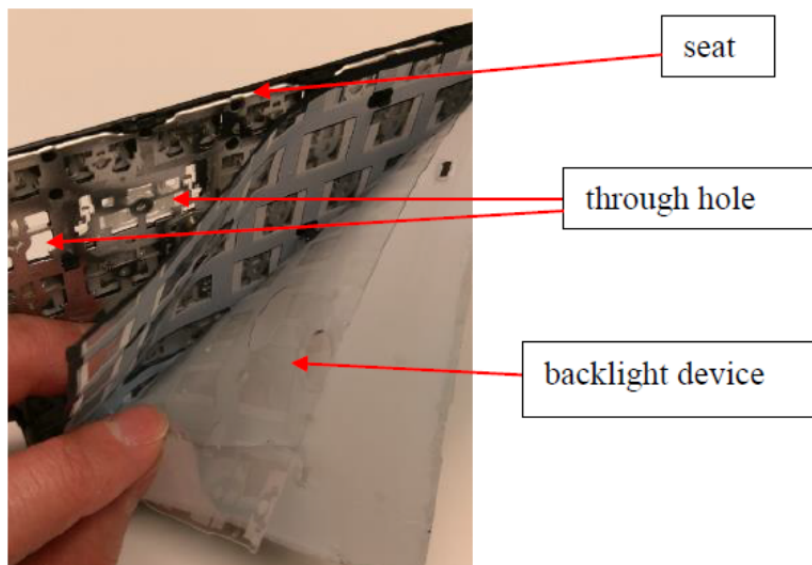
135. The HP ProBook 440 G5 keyboard's fixed member is positioned directly on the seat and connected to the connecting assembly:



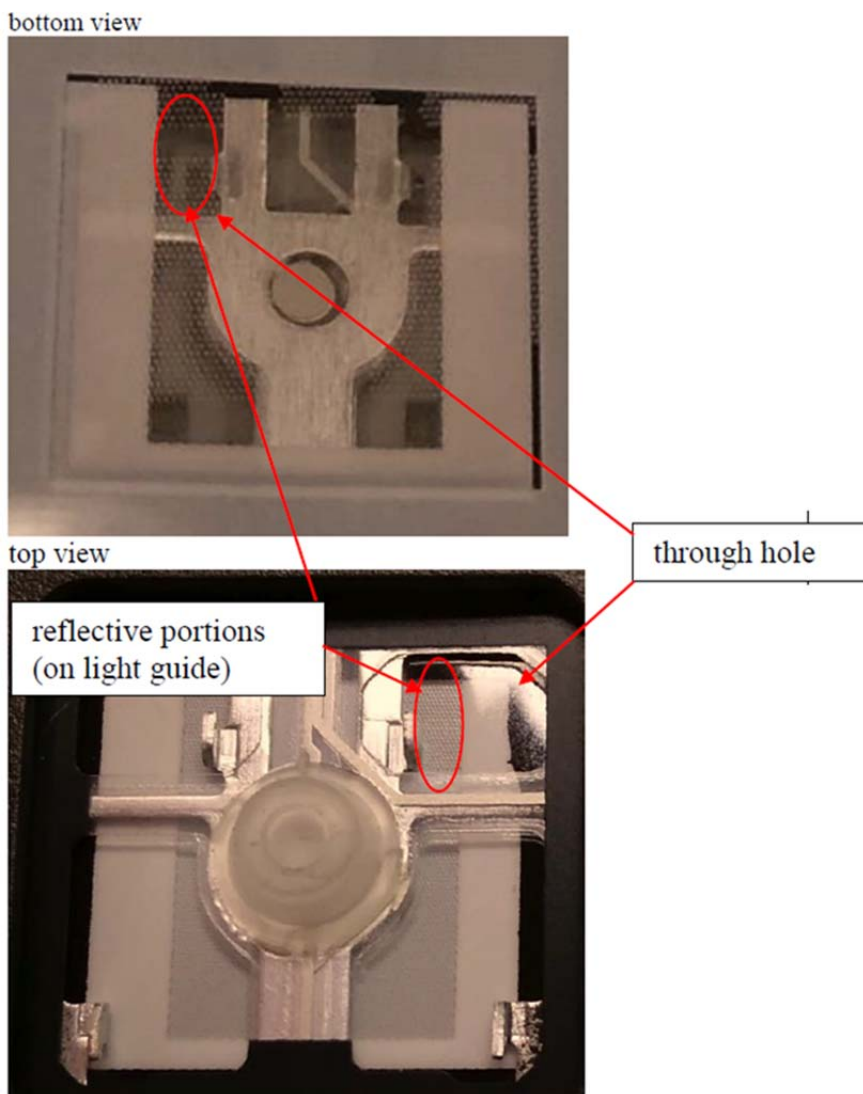
1 136. The HP ProBook 440 G5 keyboard's membrane circuit board is disposed between the
2 seat and the cap, the cap is disposed on the seat by the connecting assembly in a manner such that
3 the cap is moved upwardly and downwardly relative to the seat:



17 137. The HP ProBook 440 G5 keyboard also includes a backlight device disposed beneath
18 the seat of the key switch to illuminate the key switch via the through hole:

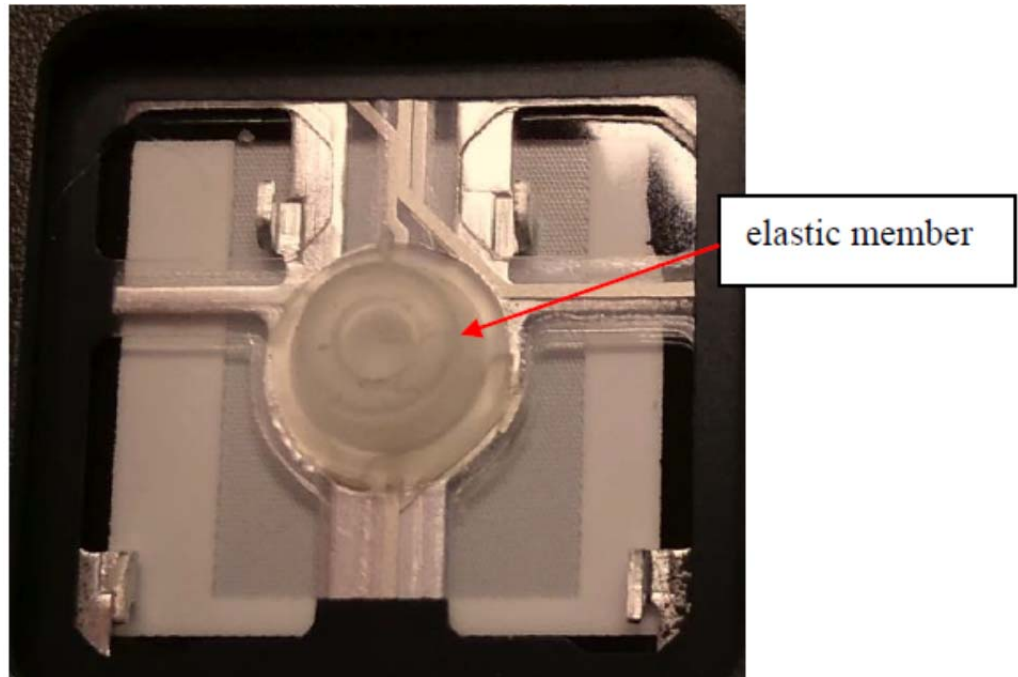


1 138. The HP ProBook 440 G5 keyboard also has a plurality of reflective portions disposed
2 underneath the cap and spaced apart from each other on the same plane:

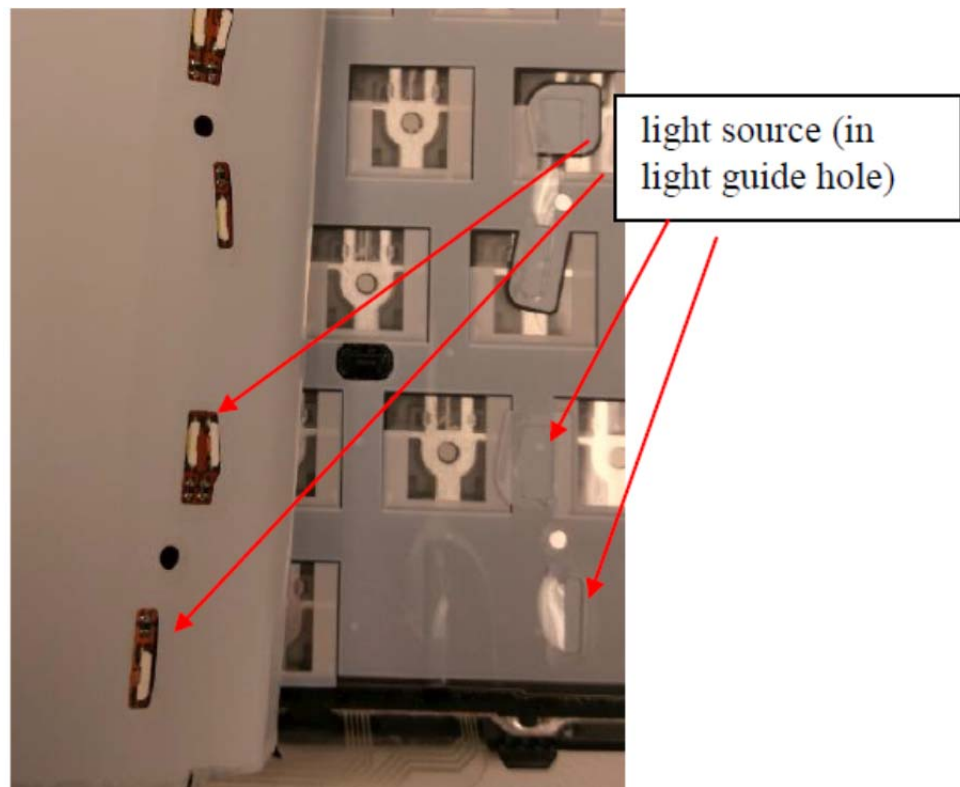


22 139. By way of further example, the HP ProBook 440 G5 keyboard also infringes Claim 5
23 of the '612 Patent because its membrane circuit board includes an elastic member:

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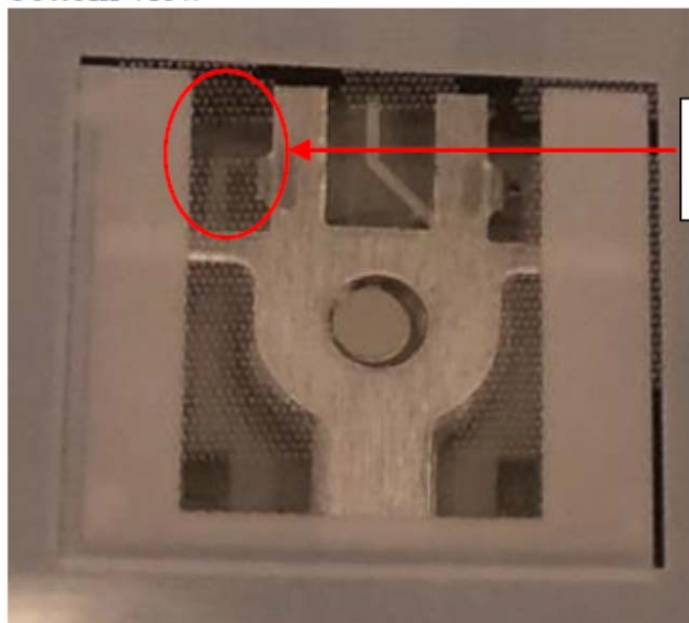


140. By way of further example, the HP ProBook 440 G5 keyboard infringes Claim 9 of the '612 Patent because it includes a light guide, including a plurality of reflective portions, disposed beneath the key switch and a light source disposed adjacent to the light guide:



1 141. By way of further example, the HP ProBook 440 G5 keyboard also infringes Claim
2 11 of the '612 Patent because the plurality of reflective portions are integrally formed at a bottom of
3 the light guide:

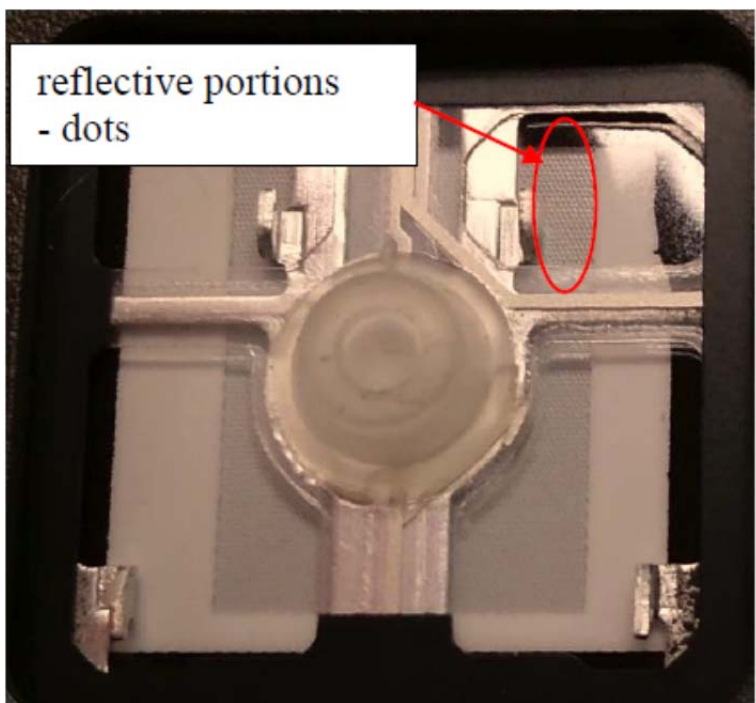
4 bottom view



reflective portions (at the
bottom of light guide)

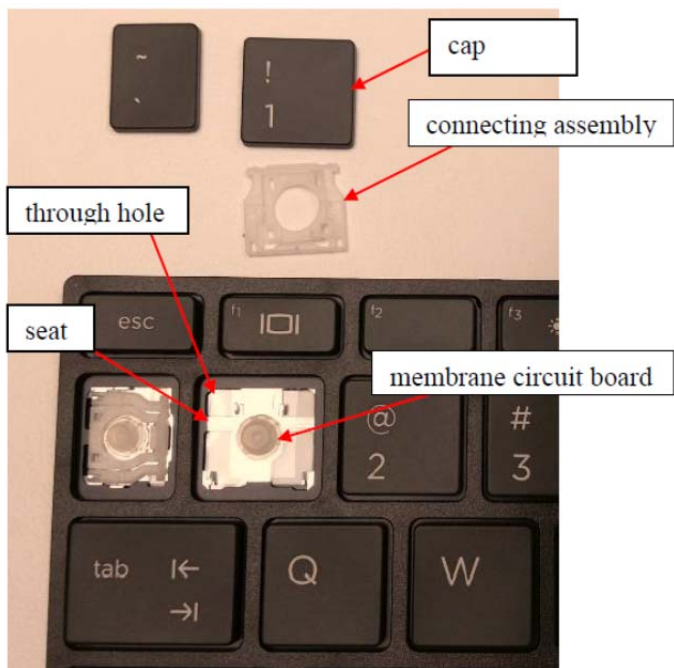
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16 142. By way of further example, the HP ProBook 440 G5 keyboard also infringes Claim
17 17 of the '612 Patent because the plurality of reflective portions are in the form of dots:
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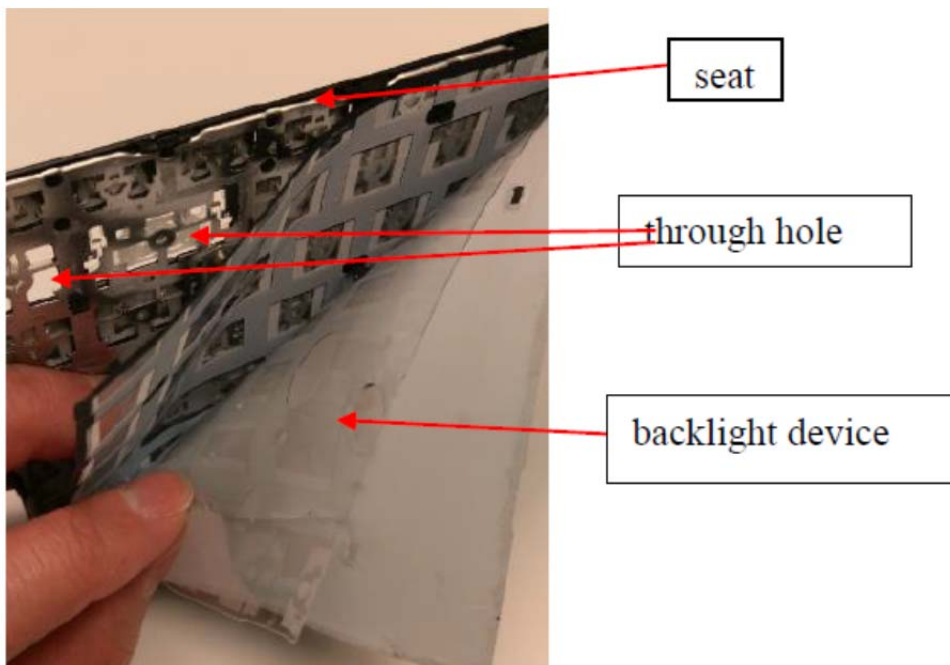


143. By way of further example, the HP ProBook 440 G5 keyboard infringes Claim 8 of the '612 Patent because it is an illuminated keyboard with a key switch including a seat, a membrane circuit board, and a cap, wherein the seat includes a through hole corresponding to the cap, the membrane circuit board is disposed between the seat and the cap, the cap is disposed on the seat by the connecting assembly in a manner such that the cap is moved upwardly and downwardly relative to the seat:

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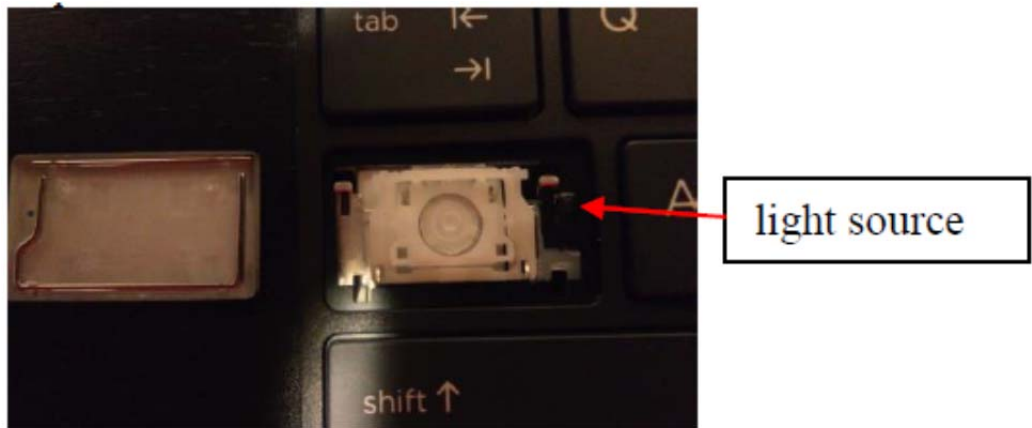


144. The HP ProBook 440 G5 keyboard includes a backlight device disposed beneath the seat of the key switch to illuminate the key switch via the through hole:

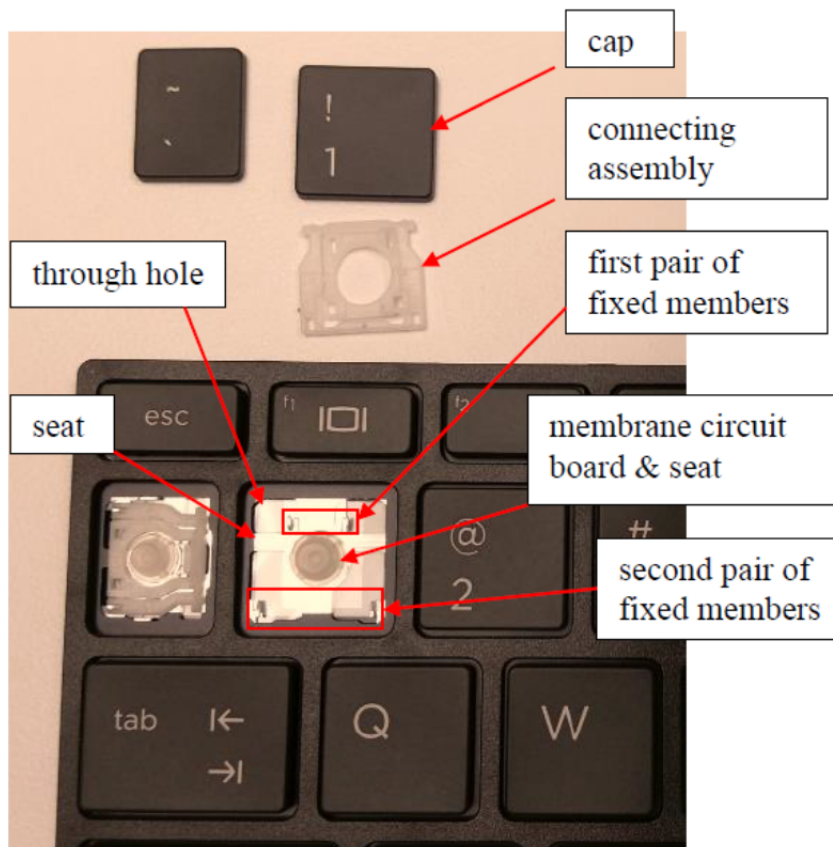


145. The HP ProBook 440 G5 keyboard's key switch also comprises a light source disposed on the membrane circuit board:

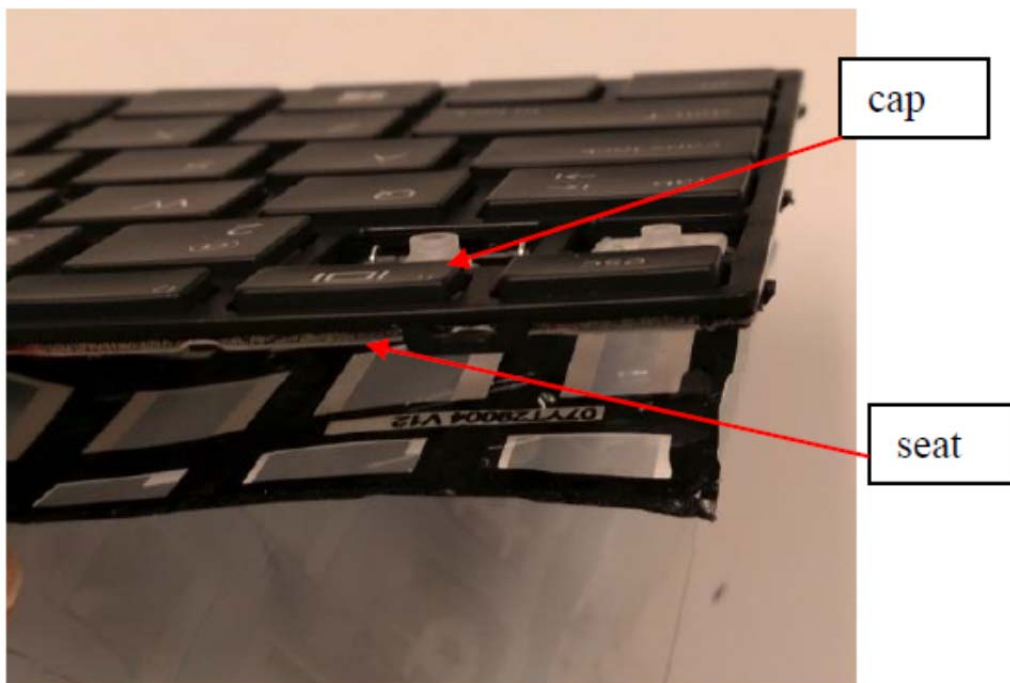
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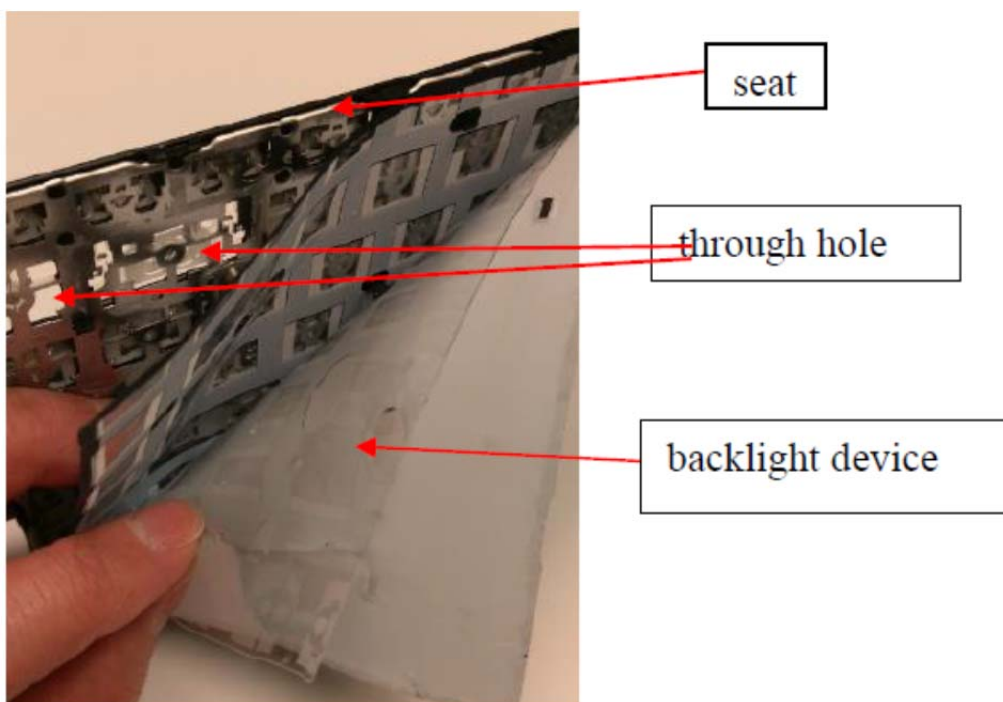
146. By way of further example, the HP ProBook 440 G5 keyboard infringes Claim 21 of the '612 Patent because it is an illuminated keyboard with a key switch including a seat, a first pair and a second pair of fixed members, a membrane circuit board, a connecting assembly, and a cap, wherein the seat includes a through hole corresponding to the cap, the first pair and second pair of fixed members are positioned directly on the seat, and the membrane circuit board is disposed between the seat and the cap:



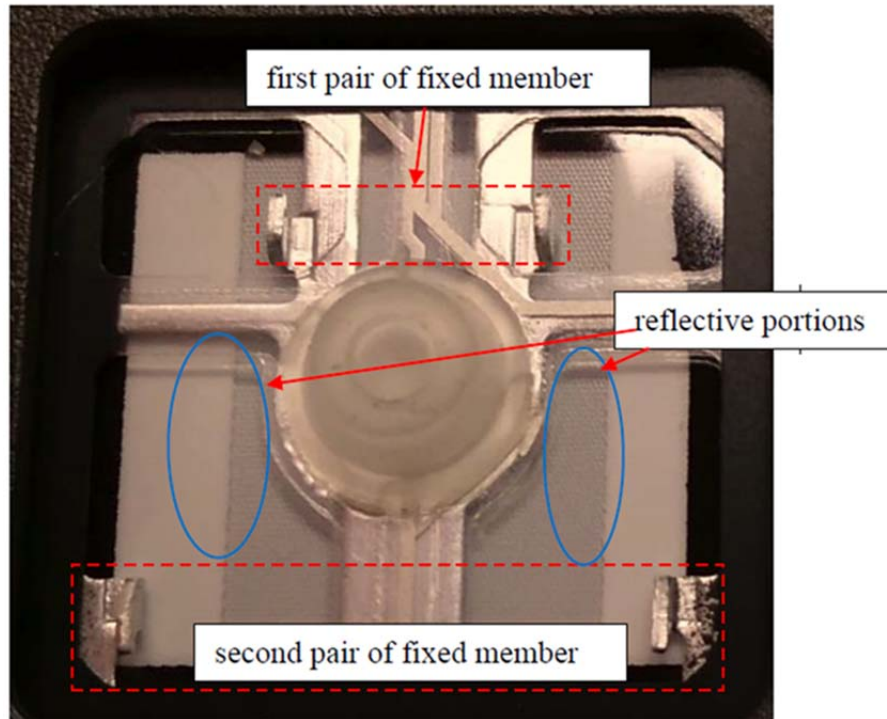
1 147. The HP ProBook 440 G5 keyboard's cap is disposed on the seat by the connecting
2 assembly in a manner such that the cap is moved upwardly and downwardly relative to the seat:



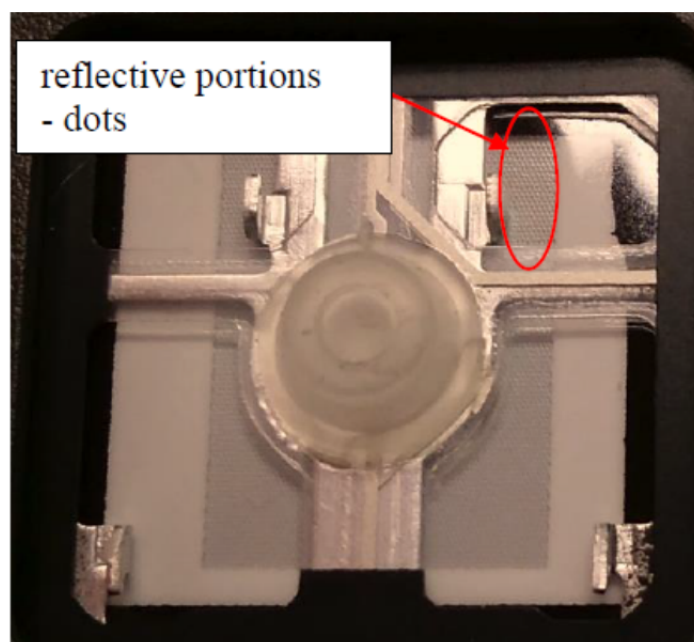
15 148. The HP ProBook 440 G5 keyboard includes a backlight device disposed beneath the
16 seat of the key switch to illuminate the key switch via the through hole:



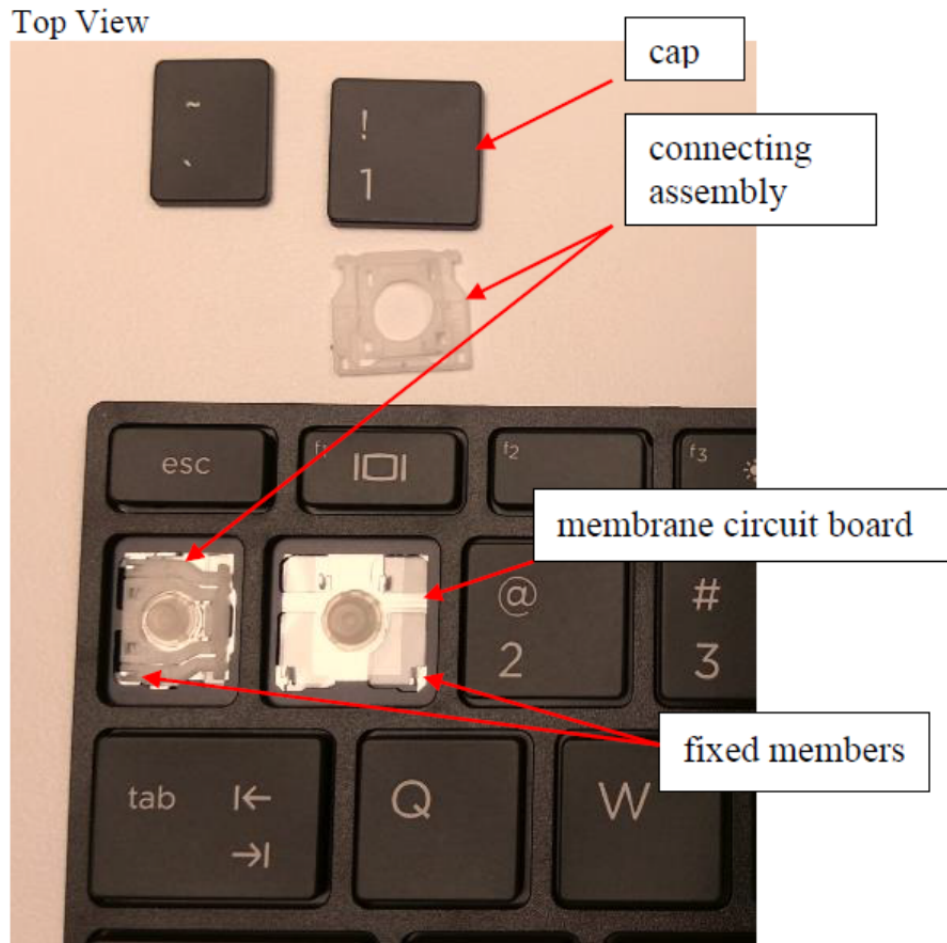
1 149. The HP ProBook 440 G5 keyboard's connecting assembly is connected to the first
2 pair and second pair of fixed members, and a plurality of reflective portions are disposed between
3 the first pair and second pair of fixed members and spaced apart from each other on the same plane:



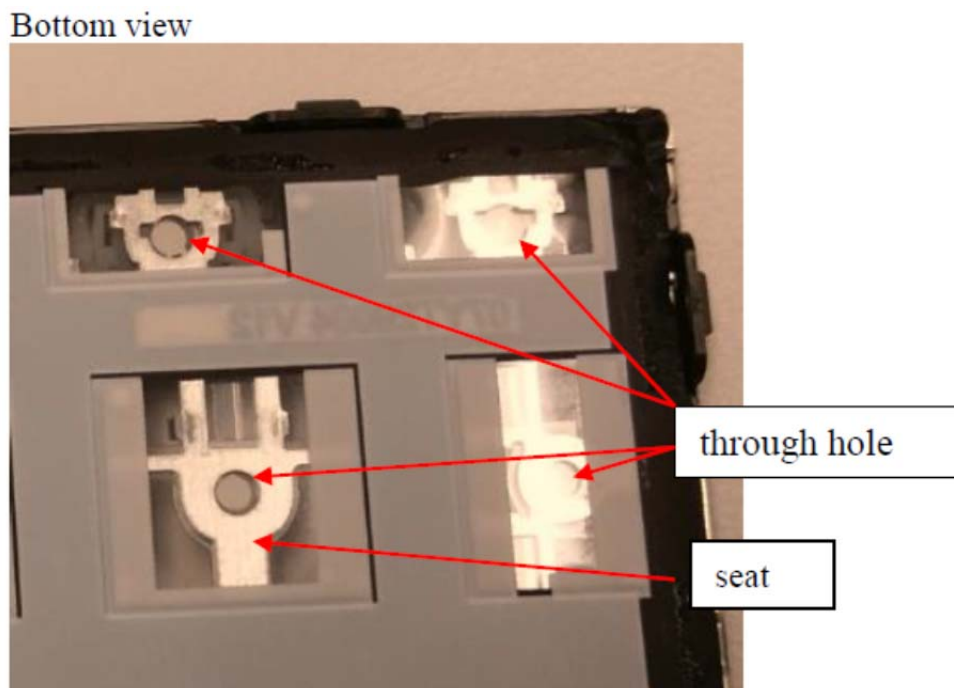
16 150. By way of further example, the HP ProBook 440 G5 keyboard infringes Claim 22 of
17 the '612 Patent because its plurality of reflective portions are in the form of dots:



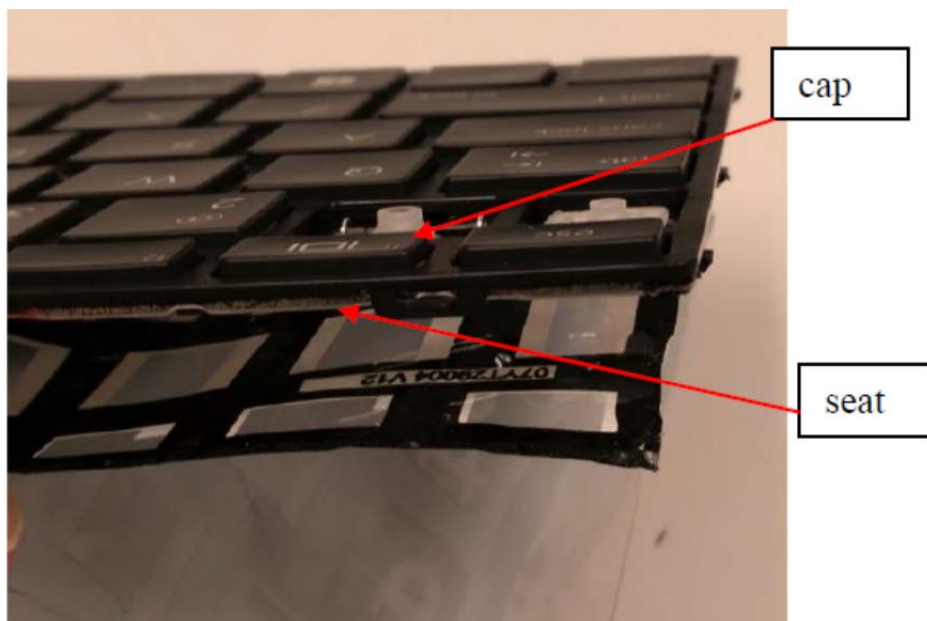
1 151. By way of further example, the HP ProBook 440 G5 keyboard infringes Claim 29 of
2 the '612 Patent because it is an illuminated keyboard including a key switch including a seat, a fixed
3 member, a membrane circuit board, a connecting assembly, and a cap, wherein the seat includes a
4 through hole corresponding to the cap, the fixed member is positioned directly on the seat and
5 connected to the connecting assembly, and the membrane circuit board is disposed between the seat
6 and the cap:



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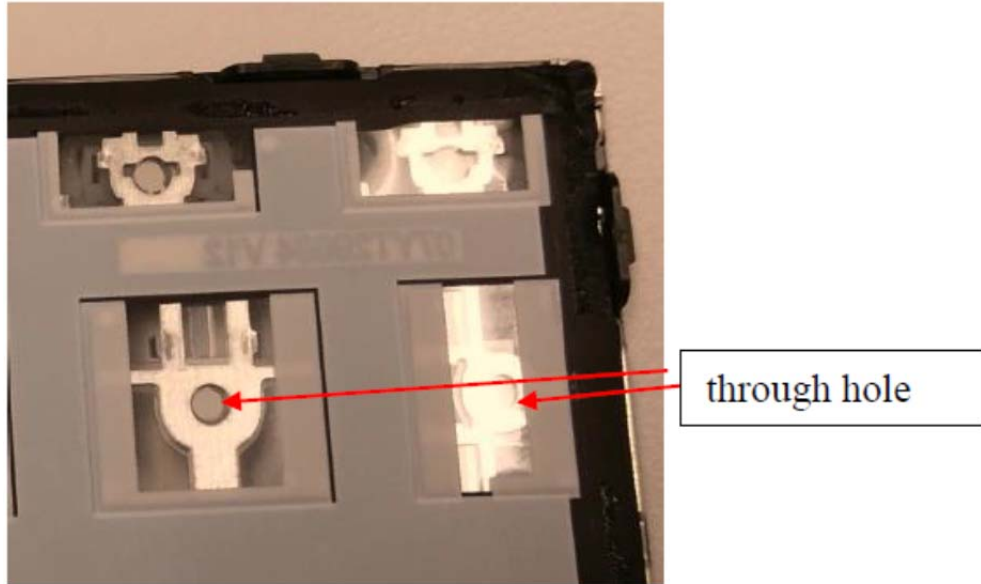
152. The HP ProBook 440 G5 keyboard's cap is disposed on the seat by the connecting assembly in such a manner that the cap is moved upwardly and downwardly relative to the seat:



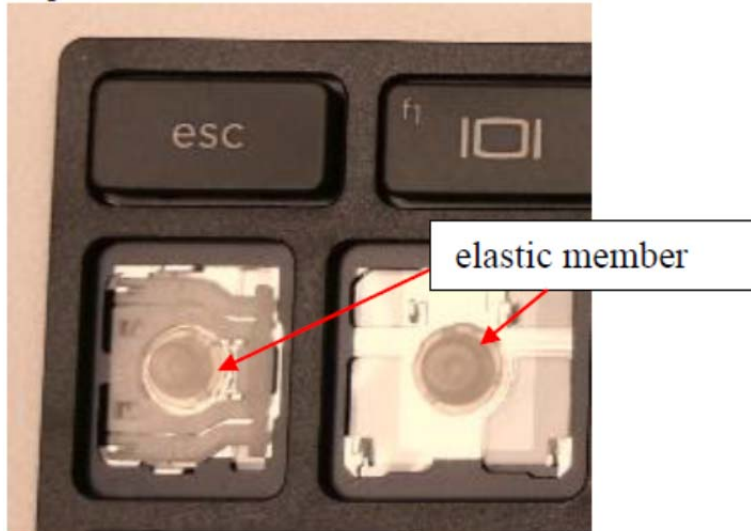
153. The HP ProBook 440 5G keyboard includes an elastic member disposed above the membrane circuit board and overlaps with the through hole in the seat of the key switch:

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Bottom view

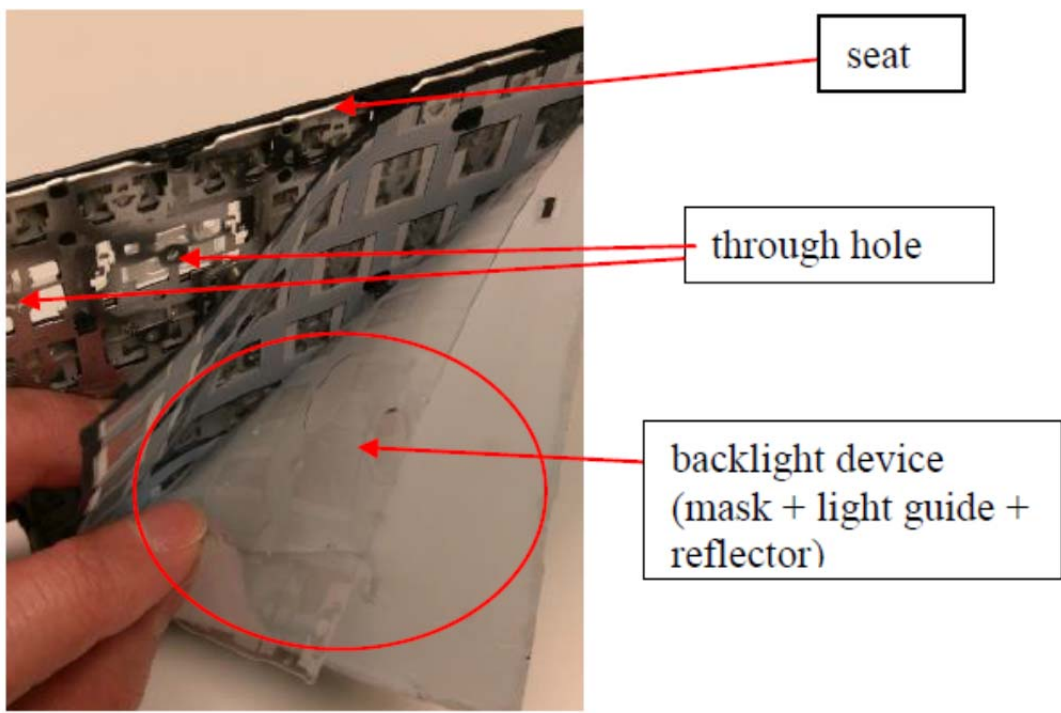


Top view

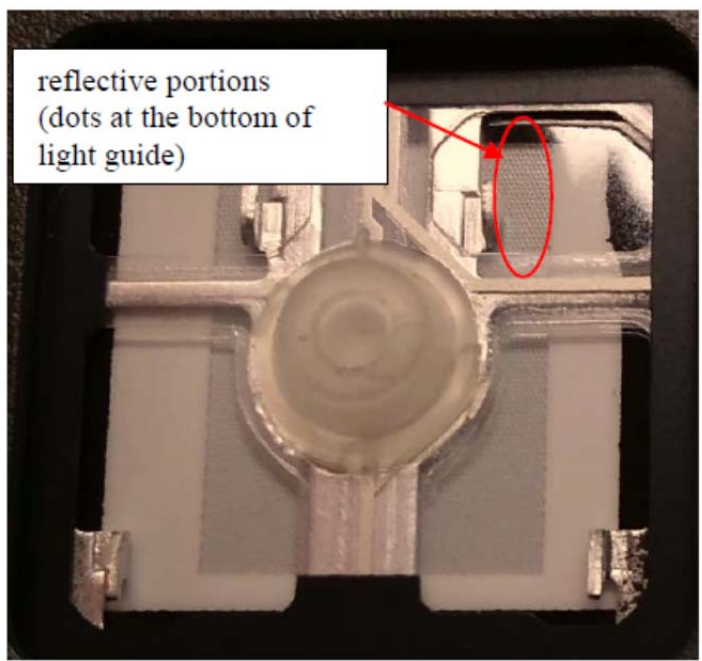


154. The HP ProBook 440 5G keyboard includes a backlight device disposed beneath the seat of the key switch to illuminate the key switch via the through hole:

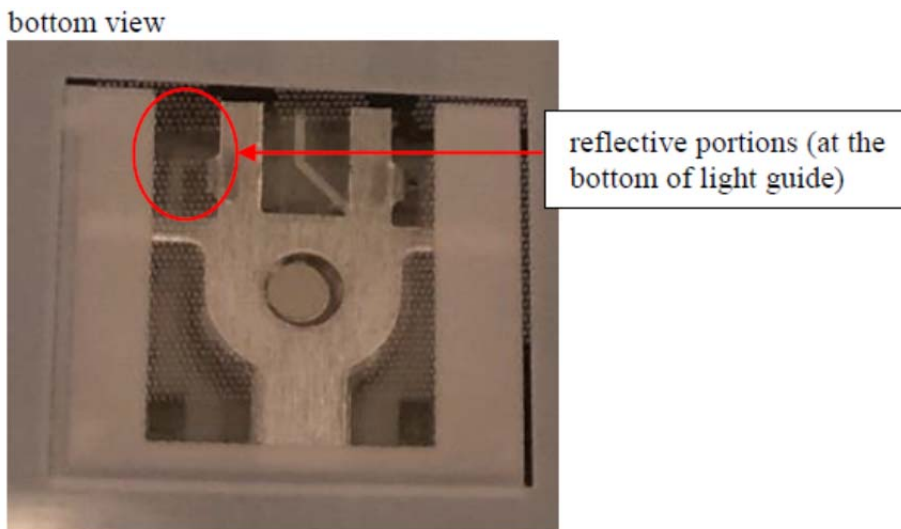
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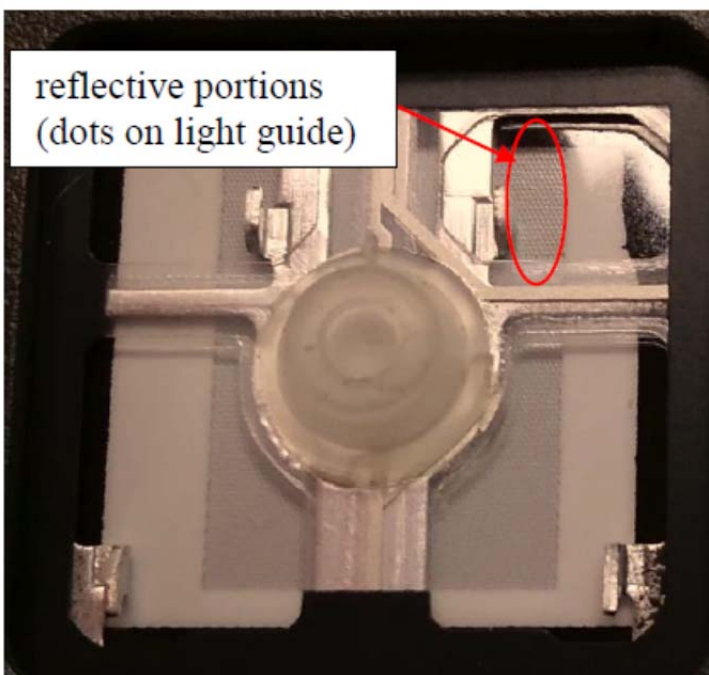
155. By way of further example, the HP ProBook 440 5G keyboard also infringes Claim 32 of the '612 Patent because its backlight device comprises a light guide disposed beneath the seat of the key switch, wherein the light guide includes a plurality of reflective portions disposed underneath the cap and spaced apart from each other at a surface of the light guide:



1 156. By way of further example, the HP ProBook 440 5G keyboard also infringes Claim
2 34 of the '612 Patent because its plurality of reflective portions are integrally formed at the bottom
3 of the light guide:



13
14 157. By way of further example, the HP ProBook 440 5G keyboard infringes Claim 35 of
15 the '612 Patent because its plurality of reflective portions are in the form of dots:



1 158. By making, using, offering for sale, selling, and/or importing the '612 Accused
2 Products that infringe the '612 Patent, Defendants are liable to Darfon for direct infringement of the
3 '612 Patent pursuant to 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents.

4
5 159. In addition, on information and belief, Defendants have induced and continue to
6 induce infringement of one more claims of the '612 Patent, including but not limited to Claims 1, 5,
7 8, 9, 11, 17, 21, 22, 29, 32, 34, and 35, pursuant to 35 U.S.C. § 271(b), by encouraging third parties
8 such as users, customers (e.g., HP), distributors, wholesalers, retailers, affiliates, parents,
9 subsidiaries, importers, or sellers to make, use, offer to sell, sell, and/or import into the United States
10 without authorization the '612 Accused Products. The making, using, offering to sell, selling, and/or
11 importing into the United States constitutes direct infringement, literally or under the doctrine of
12 equivalents, of one or more claims of the '612 Patent by such third parties. Defendants' acts of
13 inducement include: providing the '612 Accused Products or components thereof to third parties and
14 intending them to make, use, offer to sell, sell, and/or import the '612 Accused Products; advertising
15 the '612 Accused Products in the United States; and encouraging the sale and offer for sale of the
16 '612 Accused Products by other entities (for example, [https://us.liteon.com/en-
17 global/Welcome/Landing_page](https://us.liteon.com/en-global/Welcome/Landing_page) and https://us.liteon.com/en-global/Info/Liteon_trading). Upon
18 information and belief, Defendants are aware that third parties such as HP offer the '612 Accused
19 Products for sale in the United States. For example, upon information and belief, third party HP
20 offers the HP ProBook 440 G5, including keyboard, for sale in the United States at least through
21 Amazon.com:
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HP

HP Smart Buy ProBook
440 G5 14" Notebook -
Intel Core i5-8250U (8th
Gen) Quad-Core 1.60
GHz - 8 GB DDR4 SDRAM
- 256 GB SSD - Windows
10 Pro (2SS98UT)

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Available from these sellers.

- HP Smart Buy PB440G5 i5-8250U 14 8GB/256 PC Intel i5-8250U, 14.0 FHD AG LED UWVA, UMA, Webcam, 8GB DDR4, 256GB SSD, AC+BT, 3C Batt, FPR, W10 Pro64, 1yr Wrty

160. Defendants proceeded in this manner despite knowledge of the '612 Patent and their knowledge that specific actions they actively induced and continue to actively induce on the part of third parties constitute infringement of the '612 Patent. The Defendants had knowledge of the '612 Patent and the infringement of the '612 Patent no later than Lite-On's receipt of Darfon's July 16, 2012 letter, as described in Paragraph 28. At the very least, because Defendants have been and remain on notice of the '612 Patent and the accused infringement, they have been and remain willfully blind regarding the infringement they have induced and continue to induce. Darfon and its licensees have also complied with the marking provisions of 35. U.S.C. § 271 by marking their products that practice the '612 Patent, either physically or through virtual marking, including at <http://www.darfon.com/English/patents.asp>, thus providing notice to potential infringers.

161. Darfon has suffered and continues to suffer damages and irreparable harm as a result of Defendants' infringement of the '612 Patent.

162. Defendants' infringement of the '612 Patent has been and continues to be willful, deliberate, and in disregard of Darfon's patent rights. The Defendants had knowledge of the '612 Patent and the infringement of the '612 Patent no later than Lite-On's receipt of Darfon's July 16, 2012 letter, as described in Paragraph 28, and have proceeded to infringe the '612 Patent with full

1 knowledge of that patent and its applicability to Defendants' products. Defendants' intentional,
2 knowing, egregious, culpable, willful, wanton, malicious, bad faith, deliberate, consciously
3 wrongful, and/or flagrant infringement entitles Darfon to increased damages under 35 U.S.C. § 284
4 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

5 **COUNT V**

6 **INFRINGEMENT OF U.S. PATENT NO. 8,253,598**

7 163. Plaintiff incorporates by reference Paragraphs 1 through 35 above as if fully set forth
8 herein.

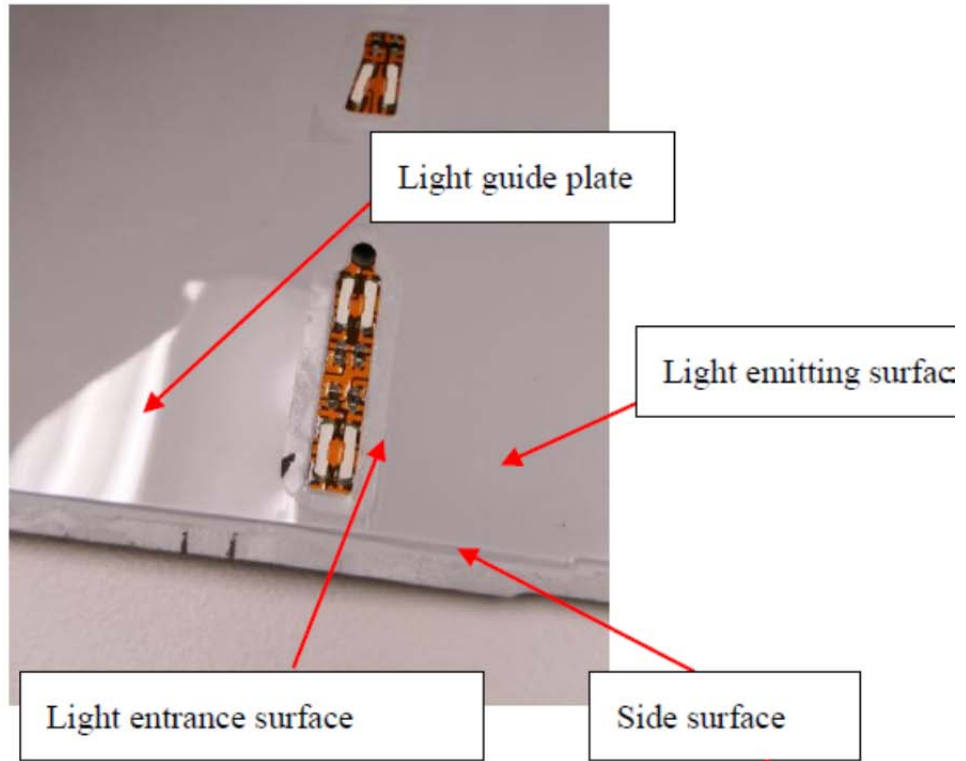
9 164. Defendants make, use, offer for sale, sell, and/or import in the United States products
10 and/or services that have infringed and continue to infringe one or more claims of the '598 Patent,
11 including but not limited to Claims 1, 9, 10, 12, 18 and 20 pursuant to 35 U.S.C. § 271(a), literally or
12 under the doctrine of equivalents. Defendants' infringing products include, for example and without
13 limitation, all versions and variations, including predecessor and successor models, of the HP
14 ProBook 440 G5 keyboard (SG-87710-XUA) ("HP ProBook 440 G5 keyboard"), which, on
15 information and belief, Defendants manufacture for HP, and any other similar products that infringe
16 at least one claim of the '598 Patent. Defendants' infringing products are collectively referred to
17 hereinafter as "the '598 Accused Products."

18 165. The '598 Accused Products are covered by one or more claims of the '598 Patent,
19 including at least Claims 1, 9, 10, 12, 18 and 20, because they contain each element of those claims.

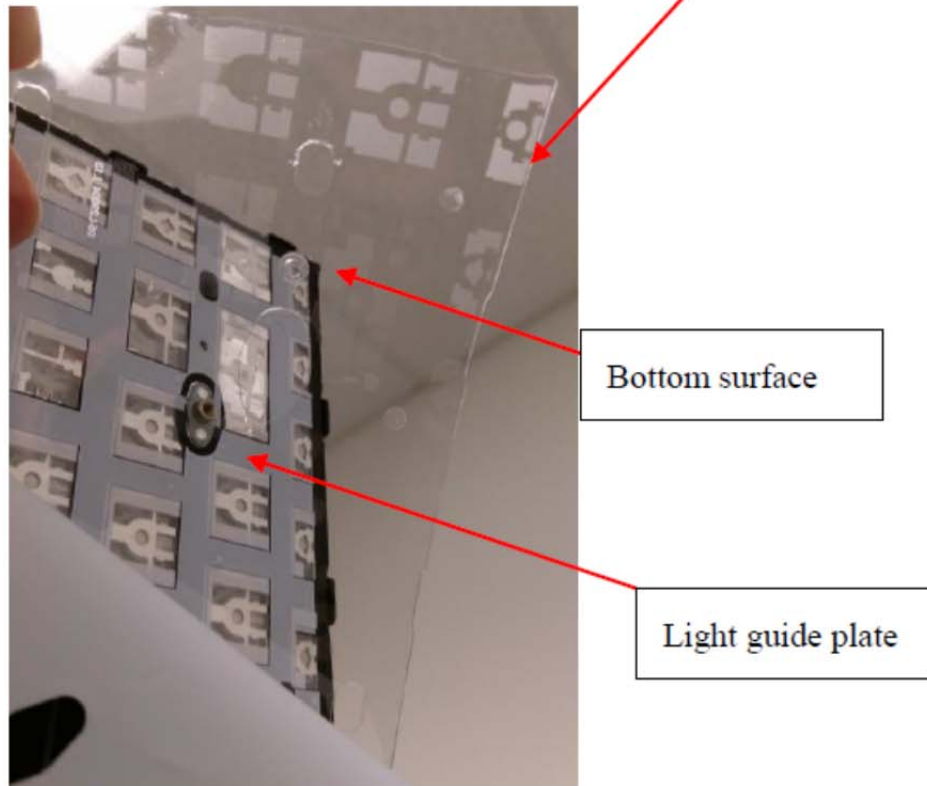
20 166. By way of example, the HP ProBook 440 G5 keyboard infringes Claim 1 of the '598
21 Patent because it is a light-emitting keyboard with a light guide plate, configured with a light
22 entrance surface, a light-emitting surface, a bottom surface and a side surface in a manner that the
23 light emitting surface is arranged opposite to the bottom surface, and the light entrance surface and
24 the side surface are arranged respectively next and connecting to the light emitting surfaced and the
25 bottom surface while being sandwiched therebetween:
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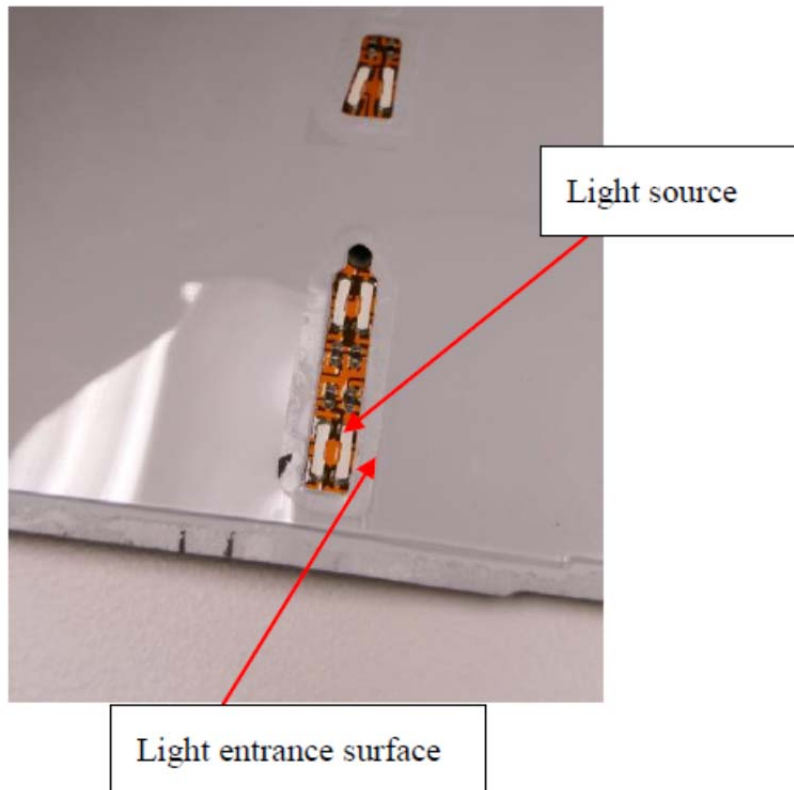
Top view of light guide



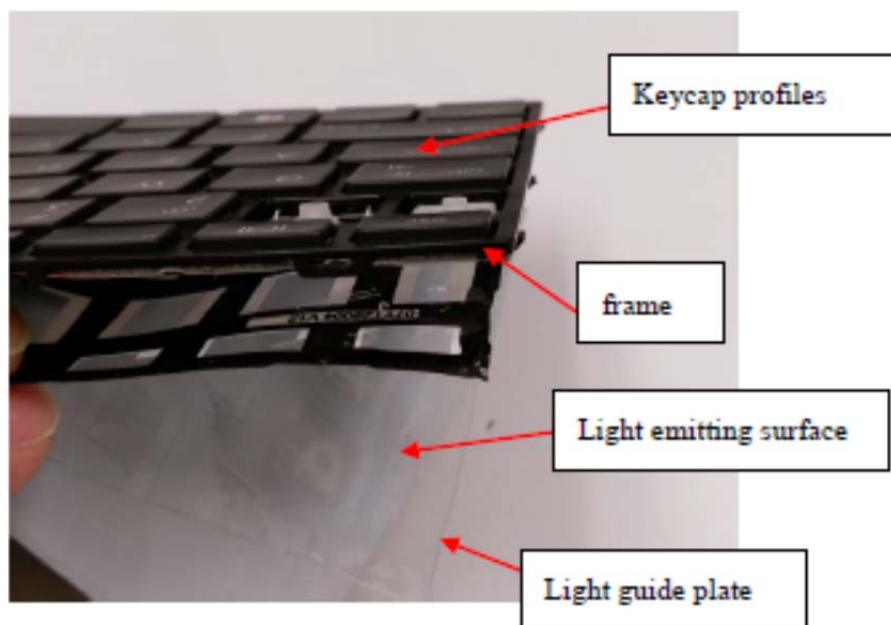
Bottom view of light guide



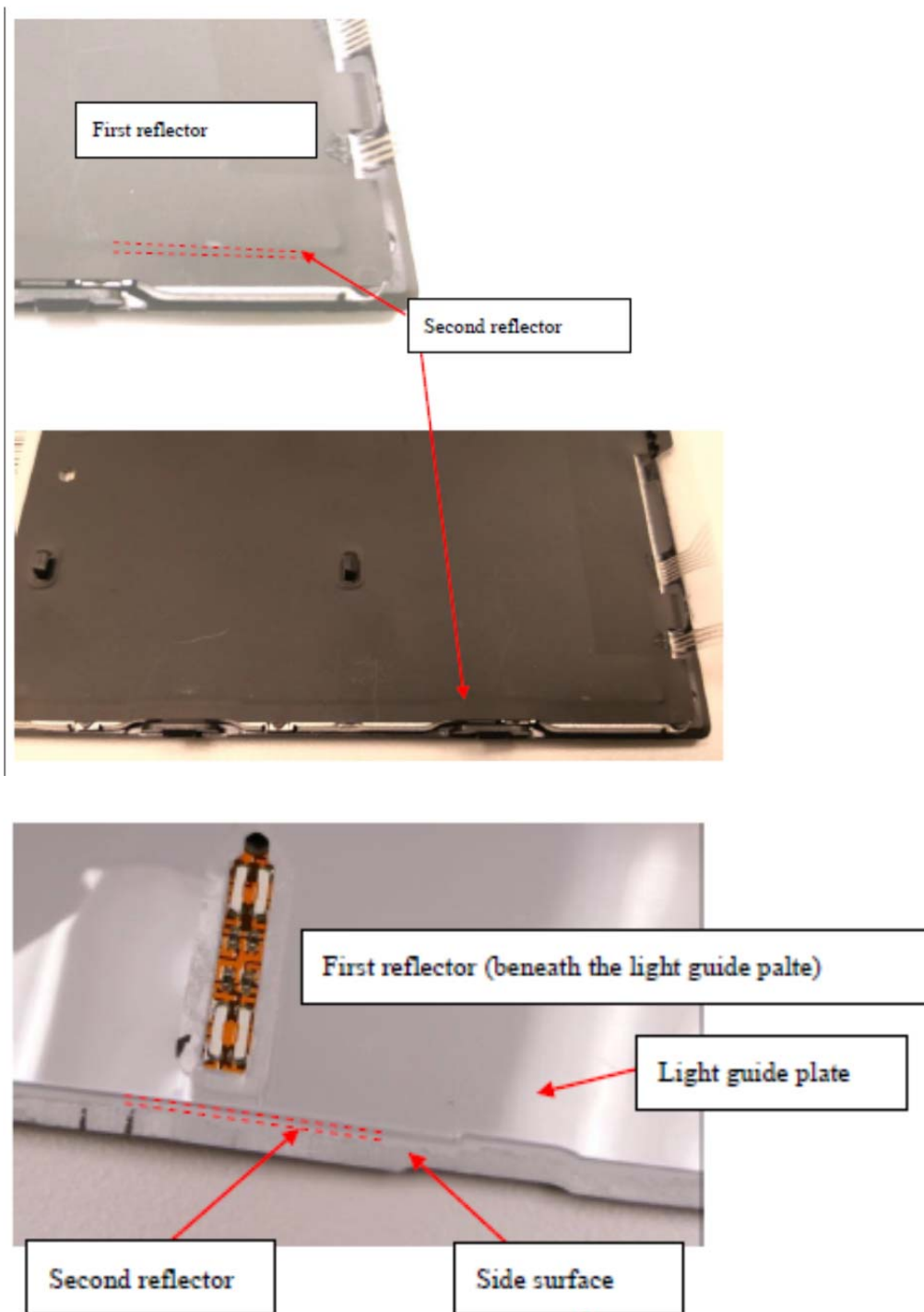
1 167. The HP ProBook 440 G5 keyboard also includes a light source disposed next to the
2 light entrance surface of the light guide plate:



16 168. The HP ProBook 440 G5 keyboard also includes a frame comprising keycap profiles
17 defined on the frame, the frame being disposed on the light emitting surface of the light guide plate:
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1 169. The HP ProBook 440 G5 keyboard also includes a first reflector, disposed on the
2 bottom surface of the light guide plate and a second reflector, disposed on the side surface of the
3 light guide plate:

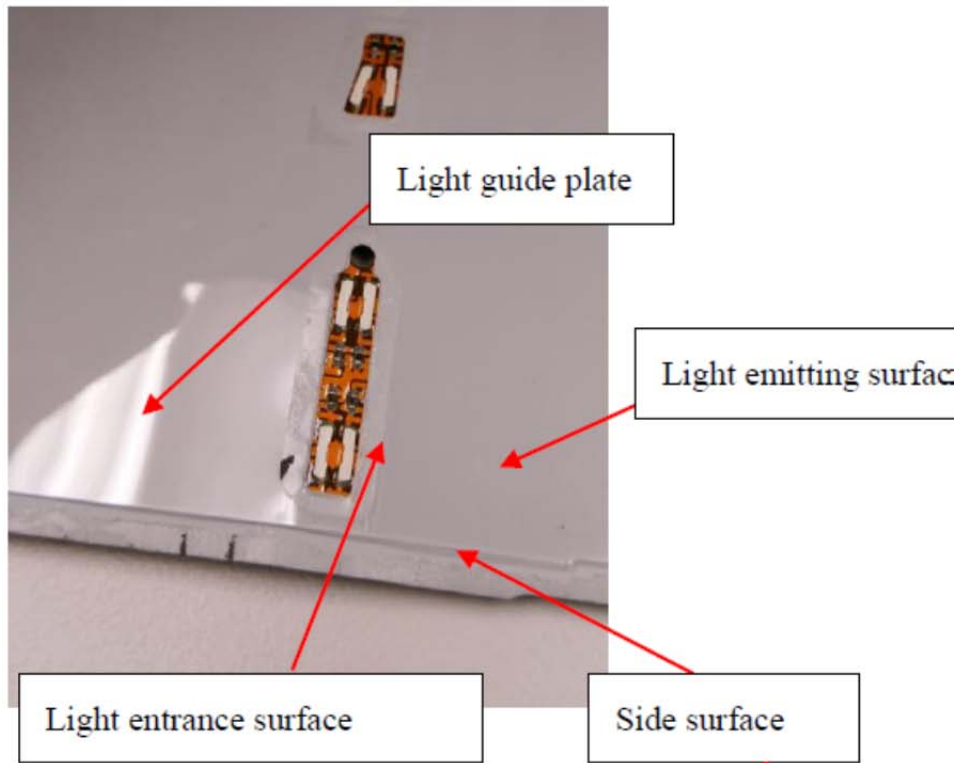


1 170. By way of further example, the HP ProBook 440 G5 keyboard also infringes Claim 9
2 of the '598 Patent because it is a light-emitting keyboard with a light guide plate, configured with a
3 light entrance surface, a light emitting surface, a bottom surface and a side surface in a manner that
4 the light emitting surface is arranged opposite to the bottom surface, and the light entrance surface
5 and the side surface are arranged respectively next and connecting to the light emitting surfaced and
6 the bottom surface while being sandwiched therebetween:

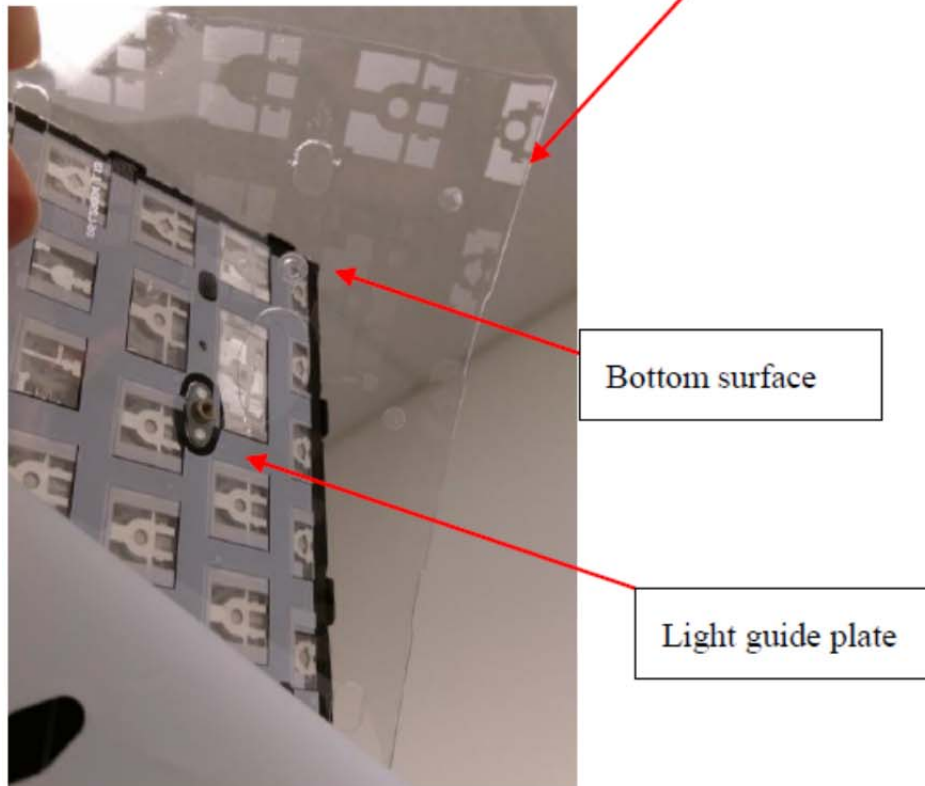
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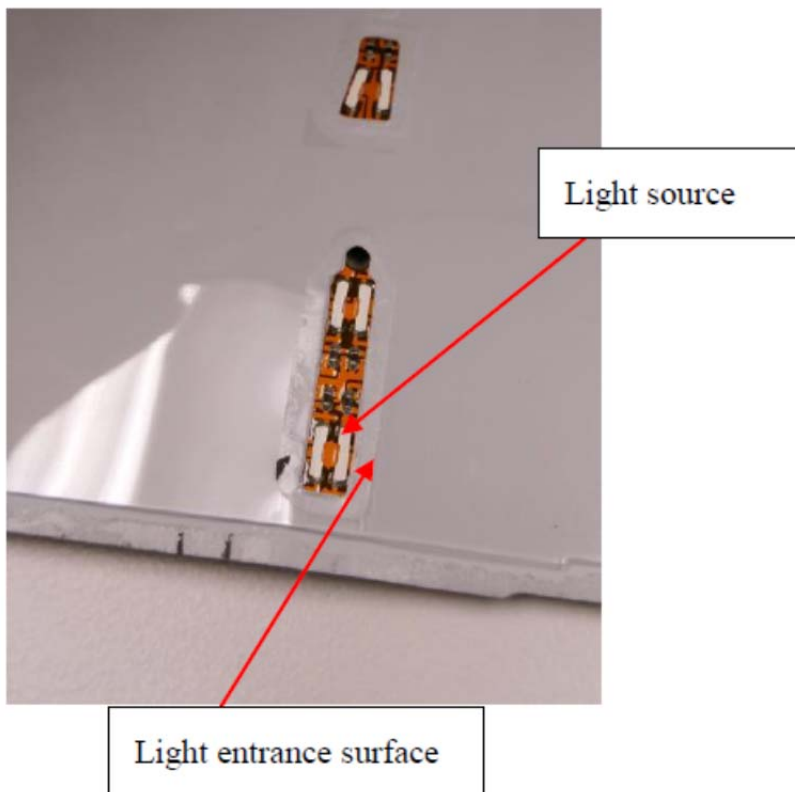
Top view of light guide



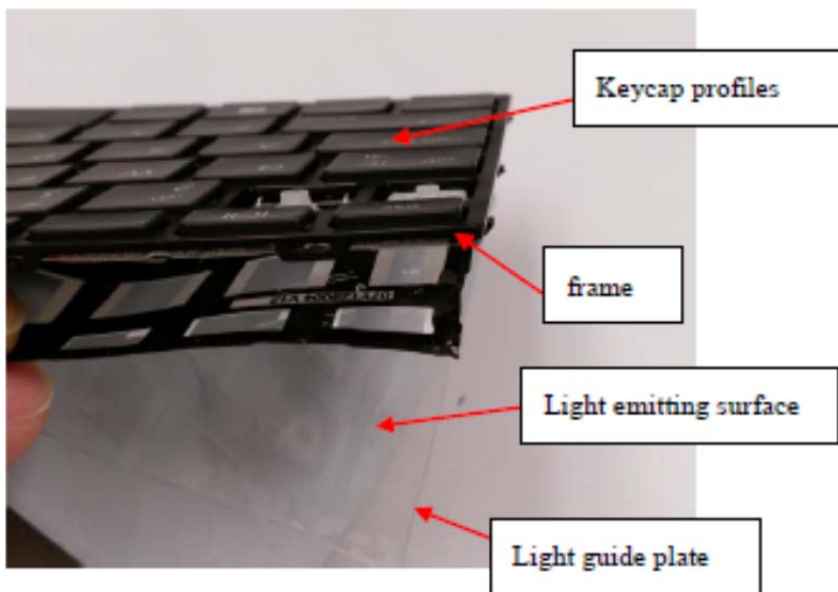
Bottom view of light guide



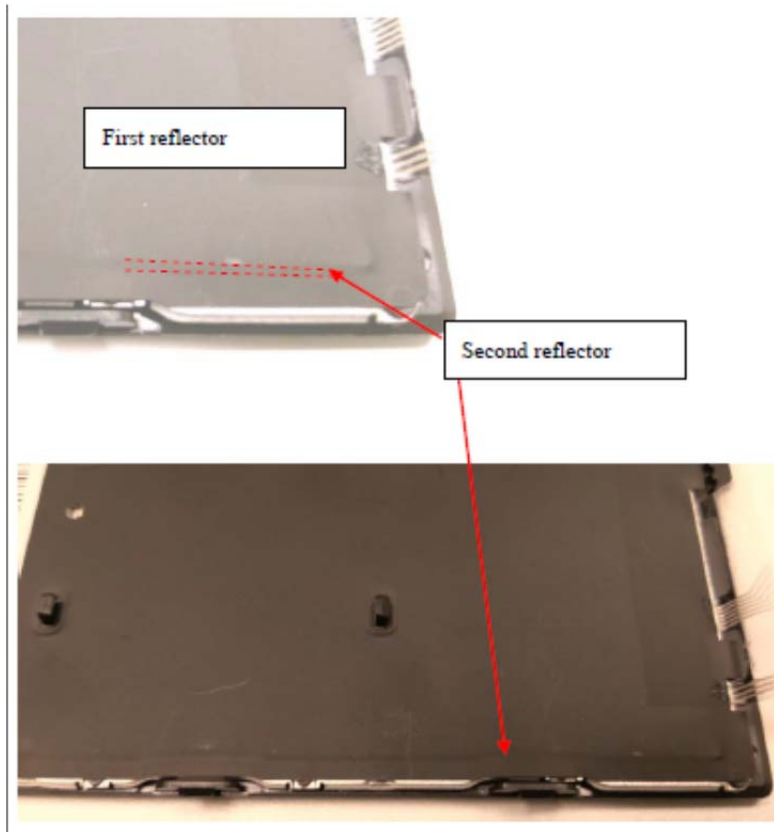
1 171. The HP ProBook 440 G5 keyboard also includes a light source disposed next to the
2 light entrance surface of the light guide plate:



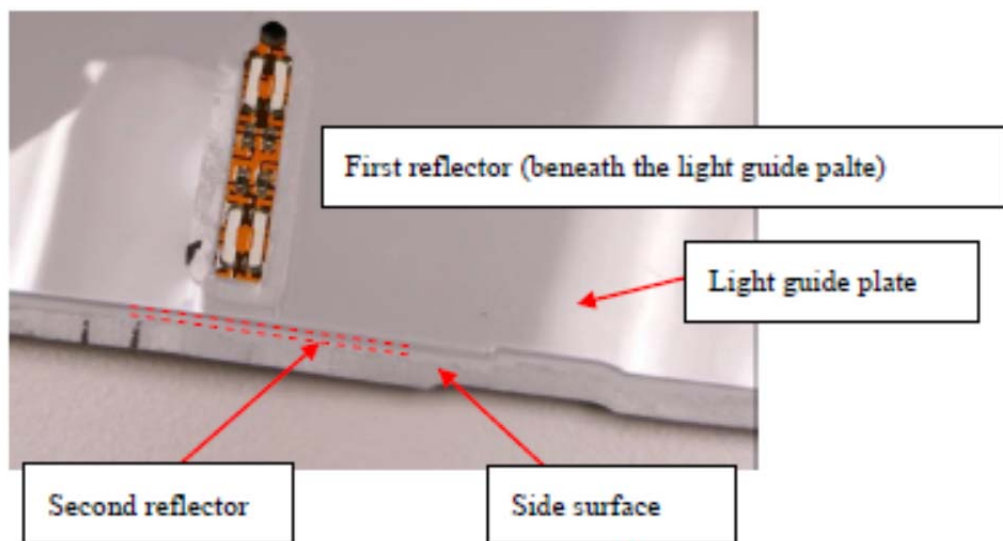
16 172. The HP ProBook 440 G5 keyboard also includes a frame disposed on the light
17 emitting surface of the light guide plate:



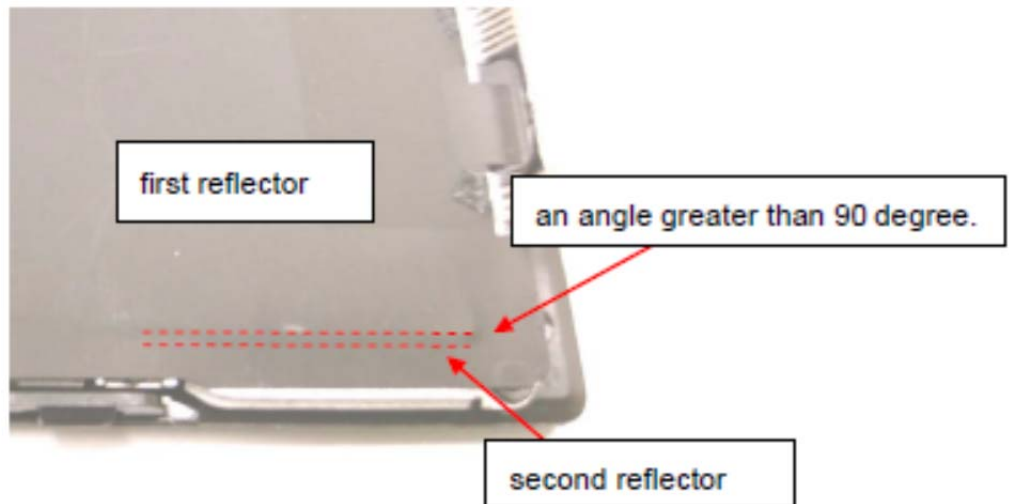
1 173. The HP ProBook 440 G5 keyboard also includes a first reflector, disposed on the
2 bottom surface of the light guide plate and a second reflector, disposed on the side surface of the
3 light guide plate:



18 174. The first and second reflectors of the HP ProBook 440 G5 keyboard are formed at an
19 angle greater than 90 degrees:



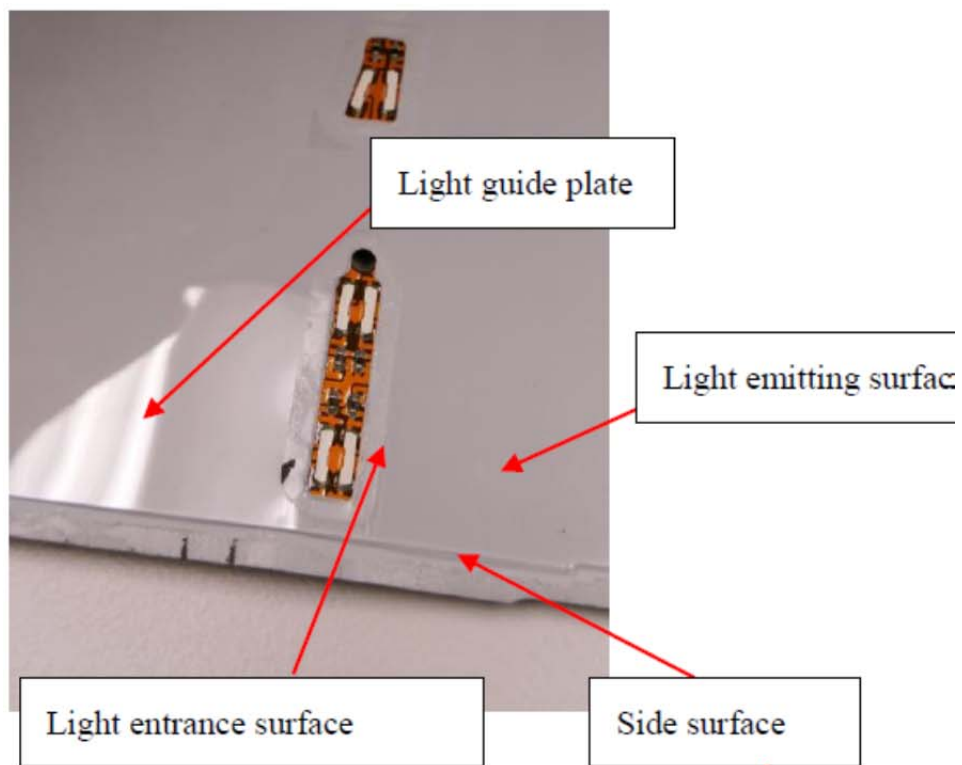
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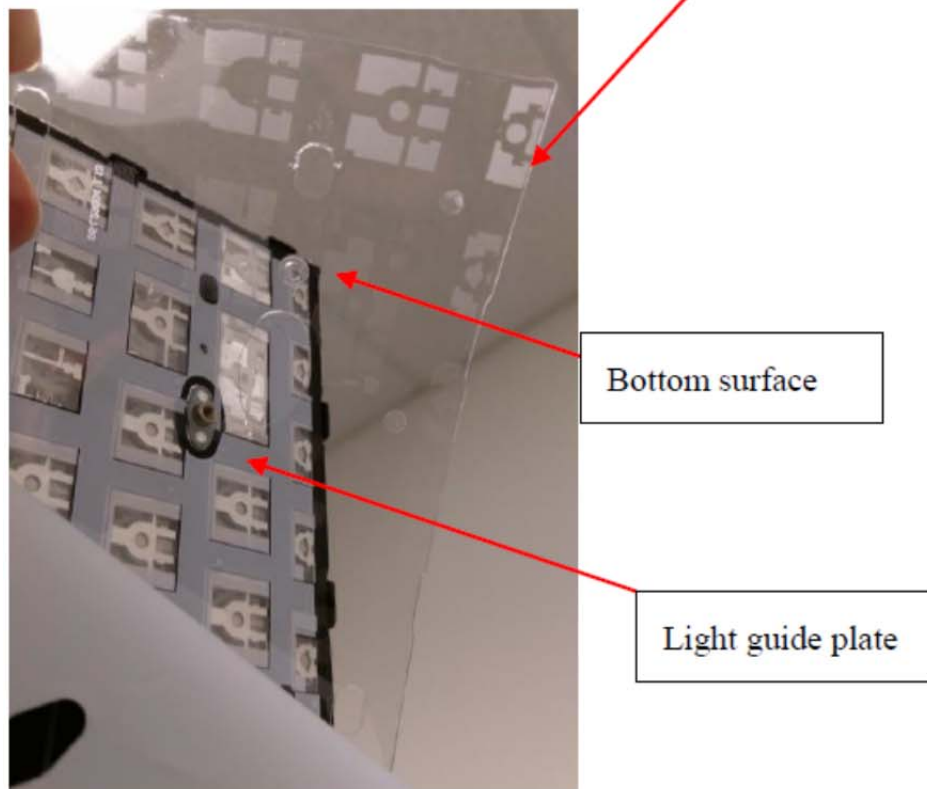
175. By way of further example, the HP ProBook 440 G5 keyboard also infringes Claim 10 of the '598 Patent because it is a light-emitting keyboard with a light guide plate, configured with a light entrance surface, a light emitting surface, a bottom surface and a side surface in a manner that the light emitting surface is arranged opposite to the bottom surface, and the light entrance surface and the side surface are arranged respectively next and connecting to the light emitting surfaced and the bottom surface while being sandwiched therebetween:

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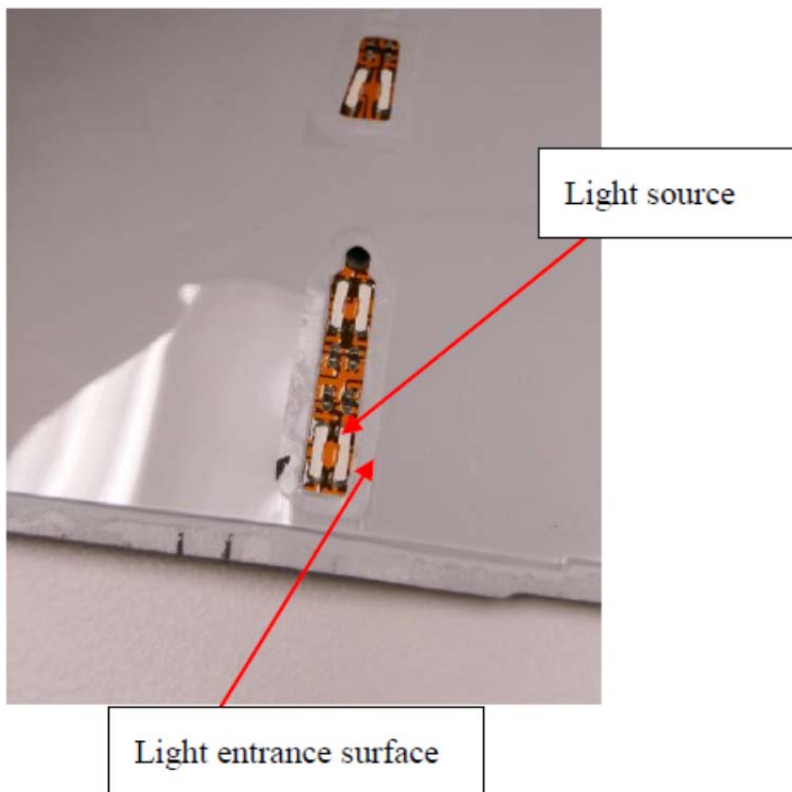
Top view of light guide



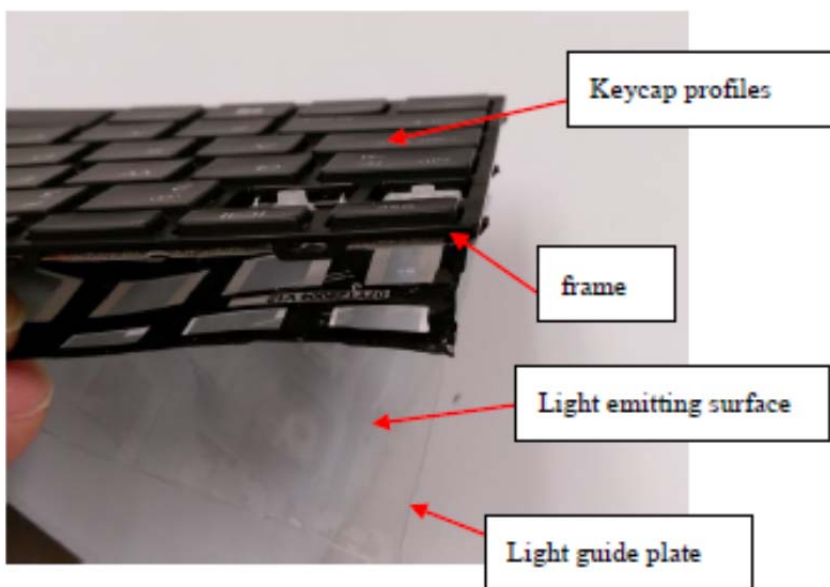
Bottom view of light guide



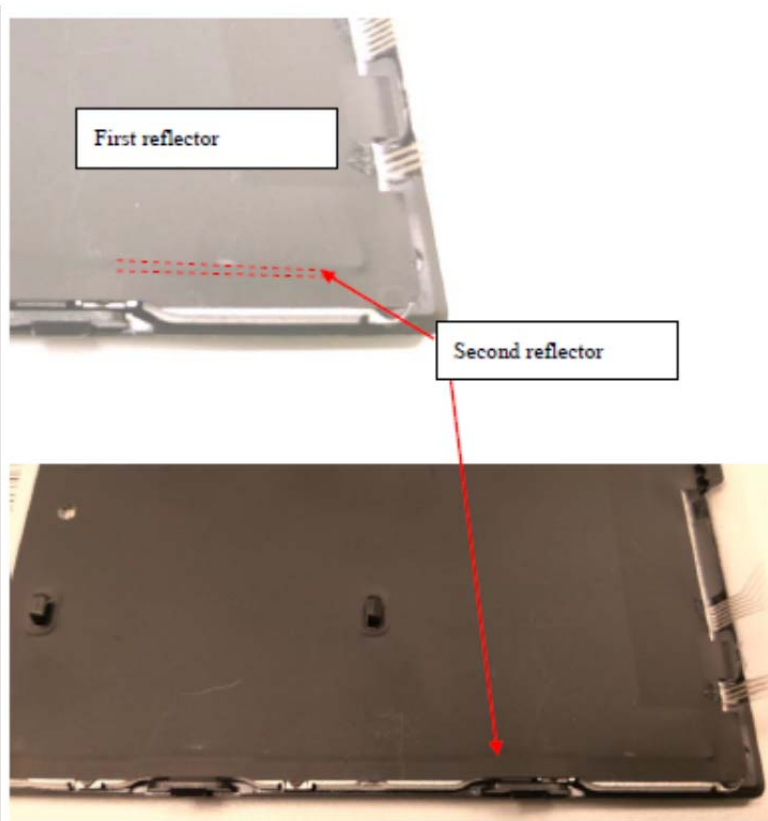
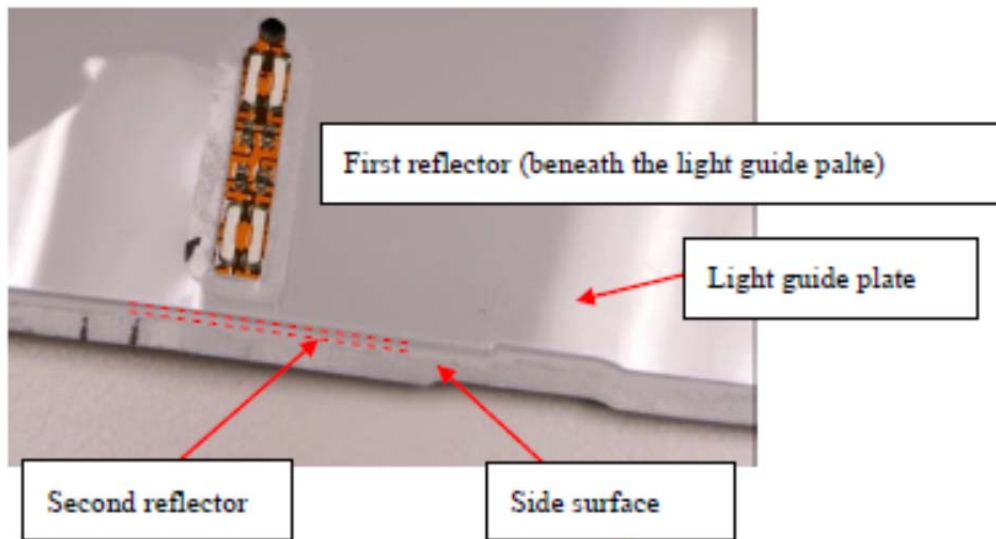
1 176. The HP ProBook 440 G5 keyboard also includes a light source disposed next to the
2 light entrance surface of the light guide plate:



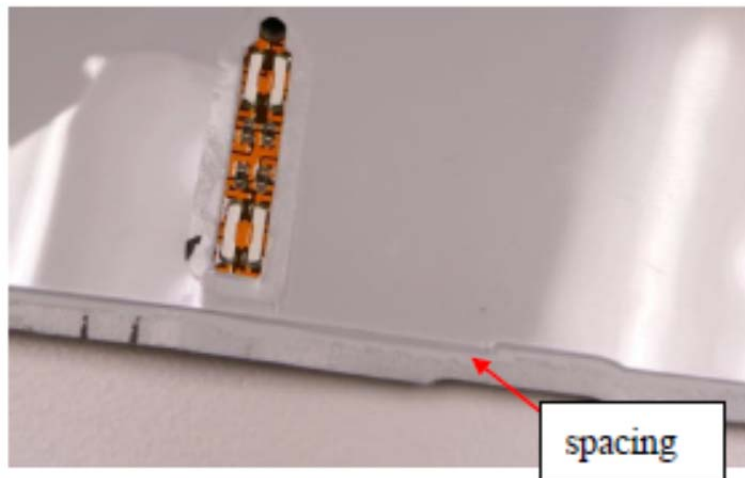
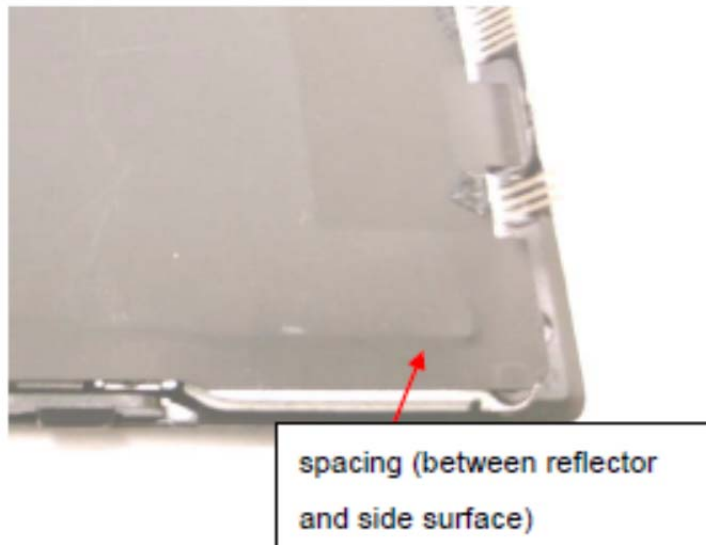
16 177. The HP ProBook 440 G5 keyboard also includes a frame disposed on the light
17 emitting surface of the light guide plate:



1 178. The HP ProBook 440 G5 keyboard also includes a first reflector, disposed on the
2 bottom surface of the light guide plate and a second reflector, disposed on the side surface of the
3 light guide plate:



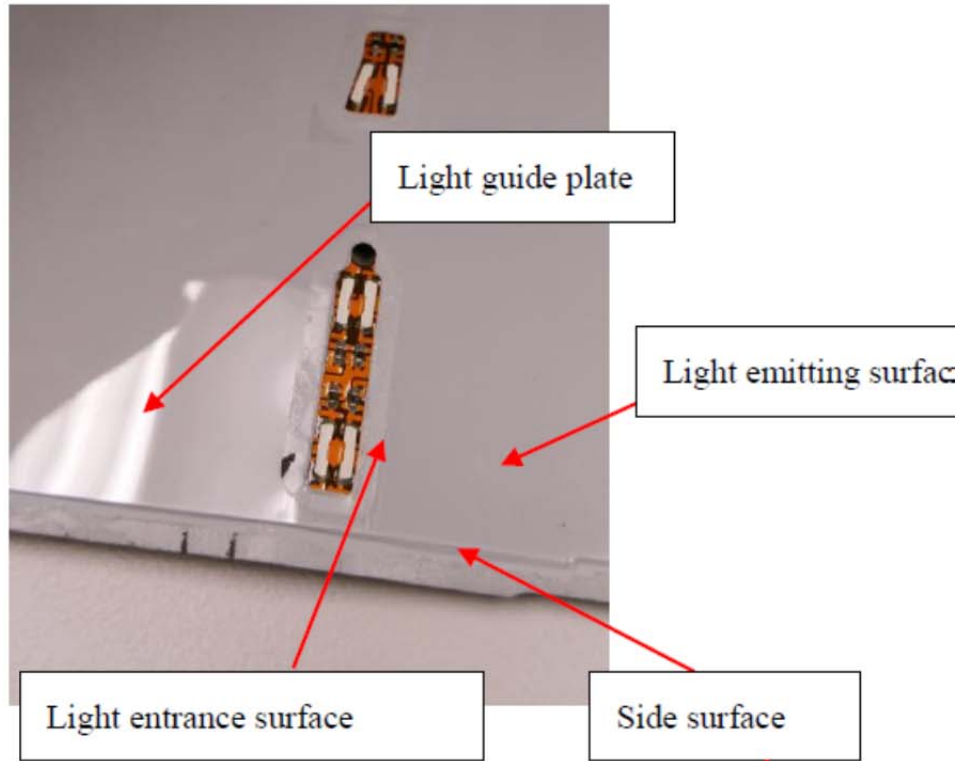
1 179. The second reflector of the HP ProBook 440 G5 is adjacent to the side surface, with
2 spacing between them:



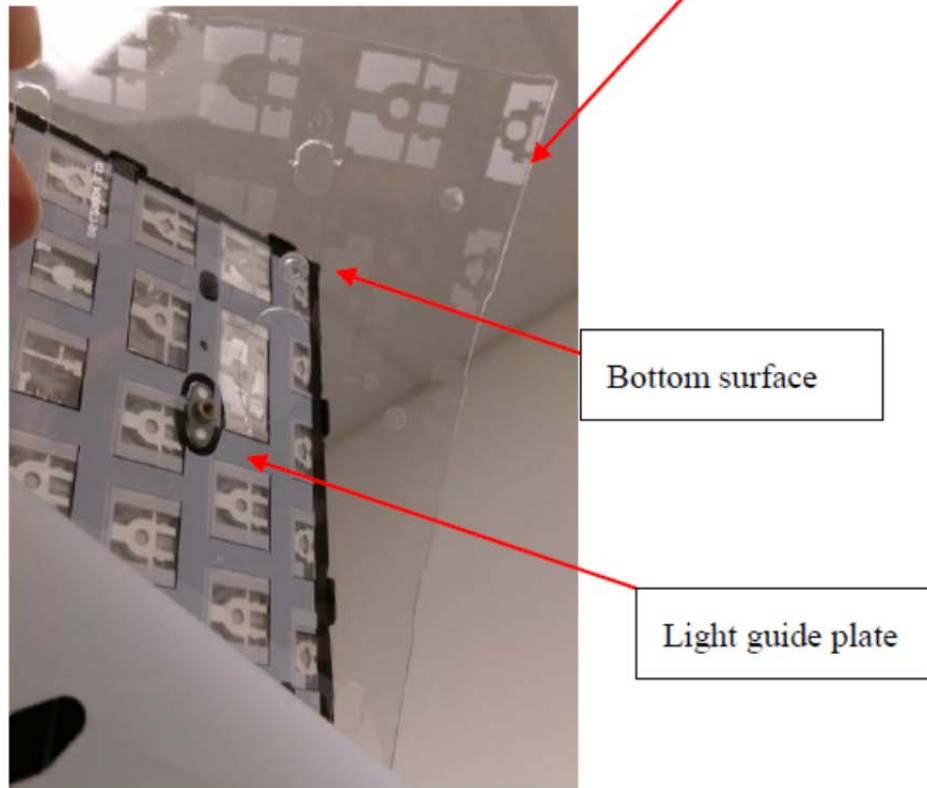
21 180. By way of further example, the HP ProBook 440 G5 keyboard also infringes Claim
22 12 of the '598 Patent because it is a light-emitting keyboard with a light guide plate, configured with
23 a light entrance surface, a light emitting surface, a bottom surface and a side surface in a manner that
24 the light emitting surface is arranged opposite to the bottom surface, and the light entrance surface
25 and the side surface are arranged respectively next and connecting to the light emitting surfaced and
26 the bottom surface while being sandwiched therebetween:

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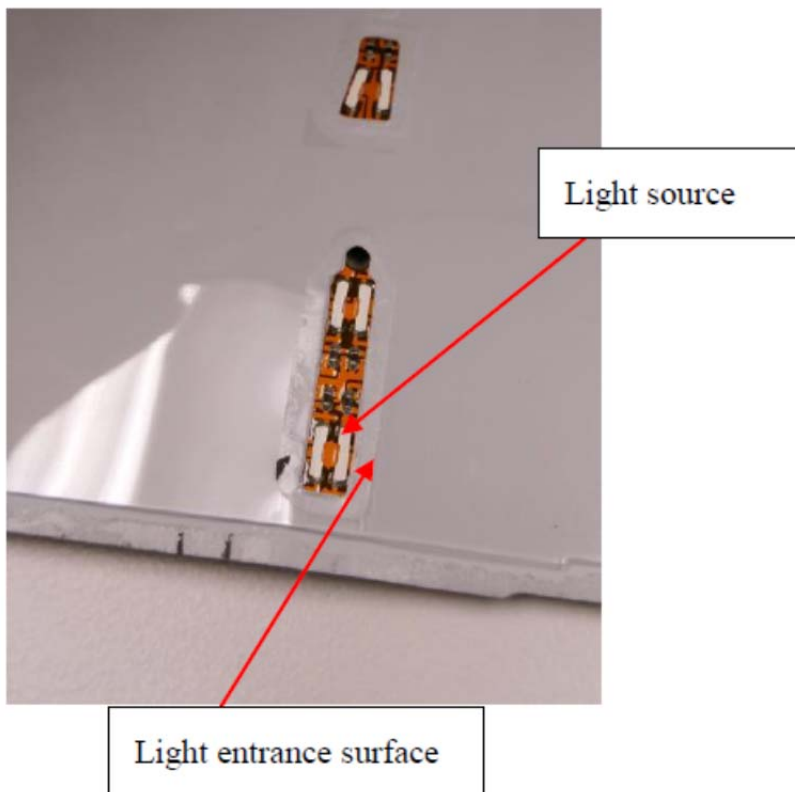
Top view of light guide



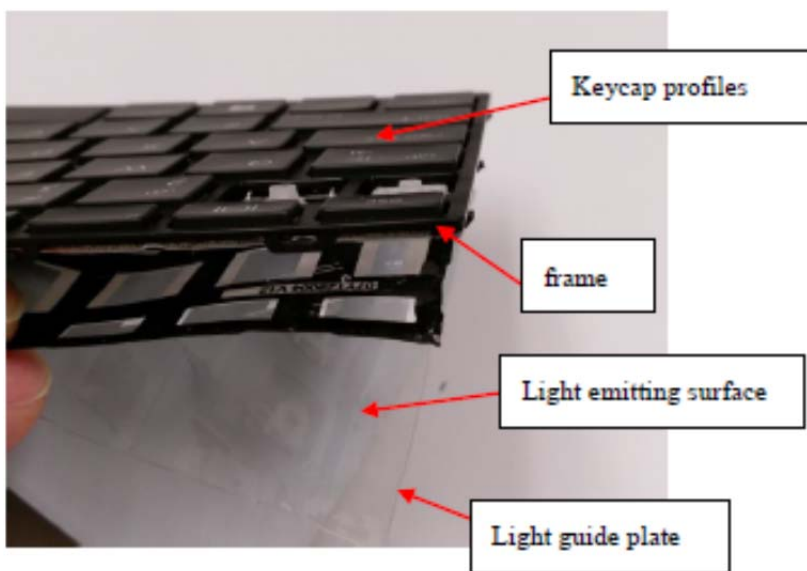
Bottom view of light guide



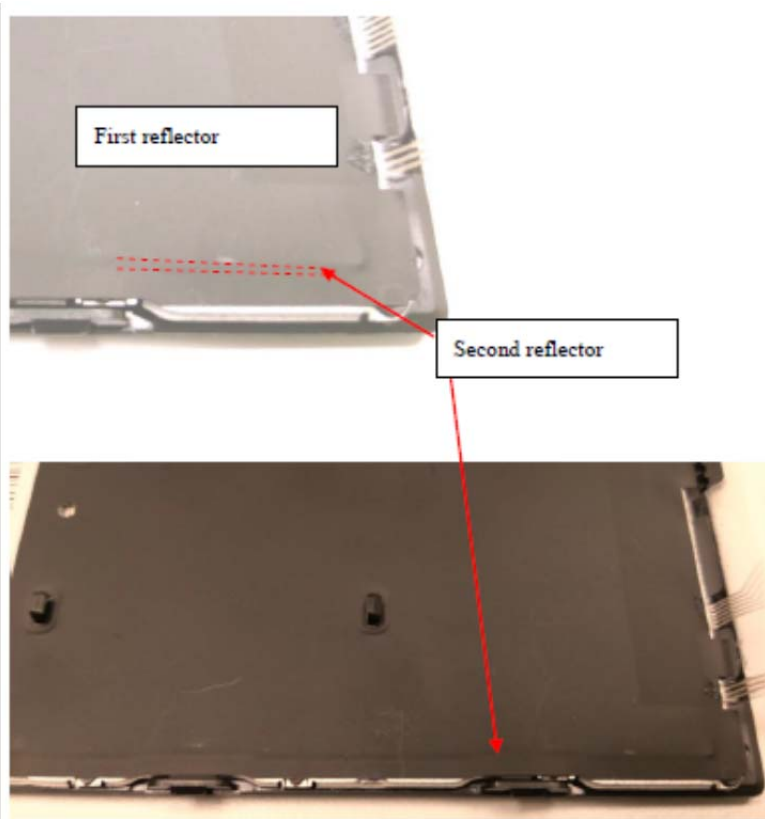
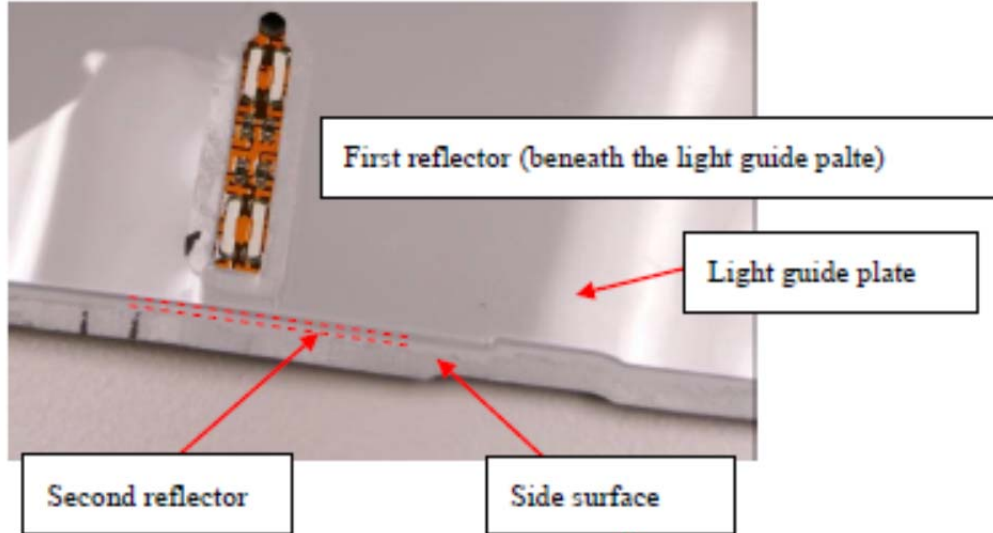
1 181. The HP ProBook 440 G5 keyboard also includes a light source disposed next to the
2 light entrance surface of the light guide plate:



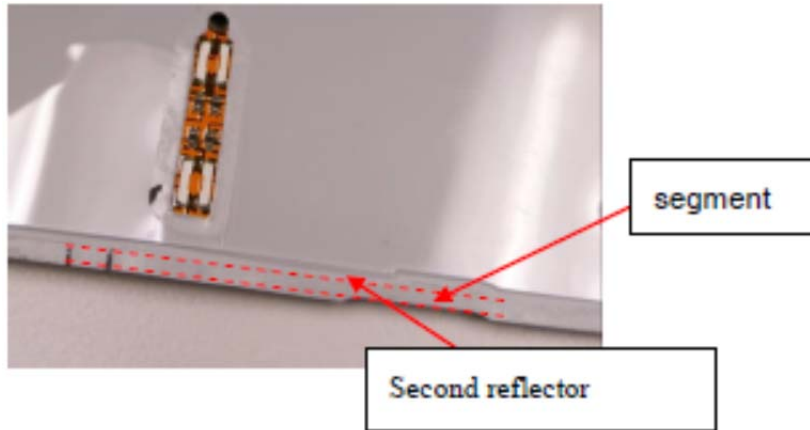
16 182. The HP ProBook 440 G5 keyboard also includes a frame disposed on the light
17 emitting surface of the light guide plate:



1 183. The HP ProBook 440 G5 keyboard also includes a first reflector, disposed on the
2 bottom surface of the light guide plate and a second reflector, disposed on the side surface of the
3 light guide plate:



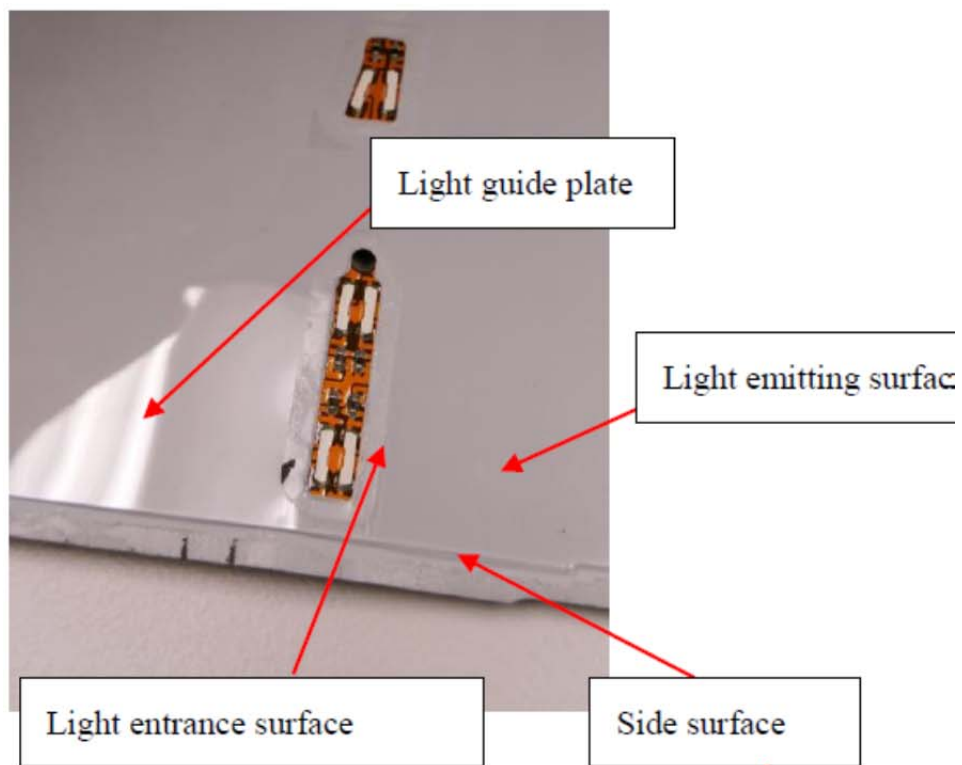
1 184. The HP ProBook 440 G5 also has a segment connected to the second reflector at one
2 end of the second reflector:



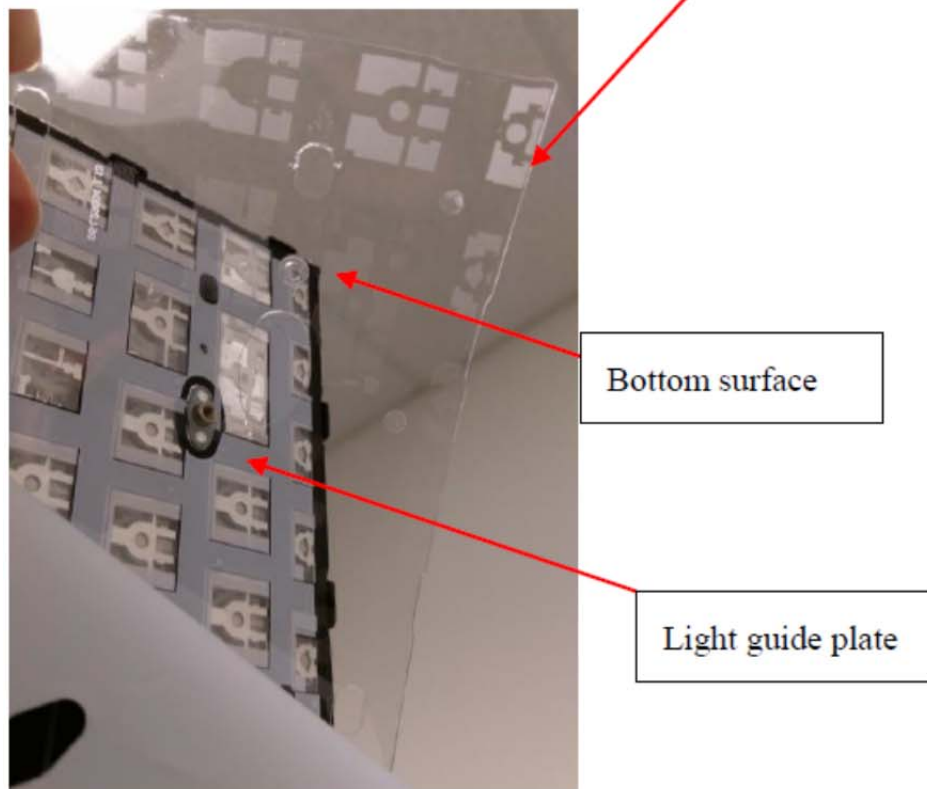
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11 185. By way of further example, the HP ProBook 440 G5 keyboard also infringes Claim
12 18 of the '598 Patent because it is a light-emitting keyboard with a light guide plate, configured with
13 a light entrance surface, a light emitting surface, a bottom surface and a side surface in a manner that
14 the light emitting surface is arranged opposite to the bottom surface, and the light entrance surface
15 and the side surface are arranged respectively next and connecting to the light emitting surfaced and
16 the bottom surface while being sandwiched therebetween:

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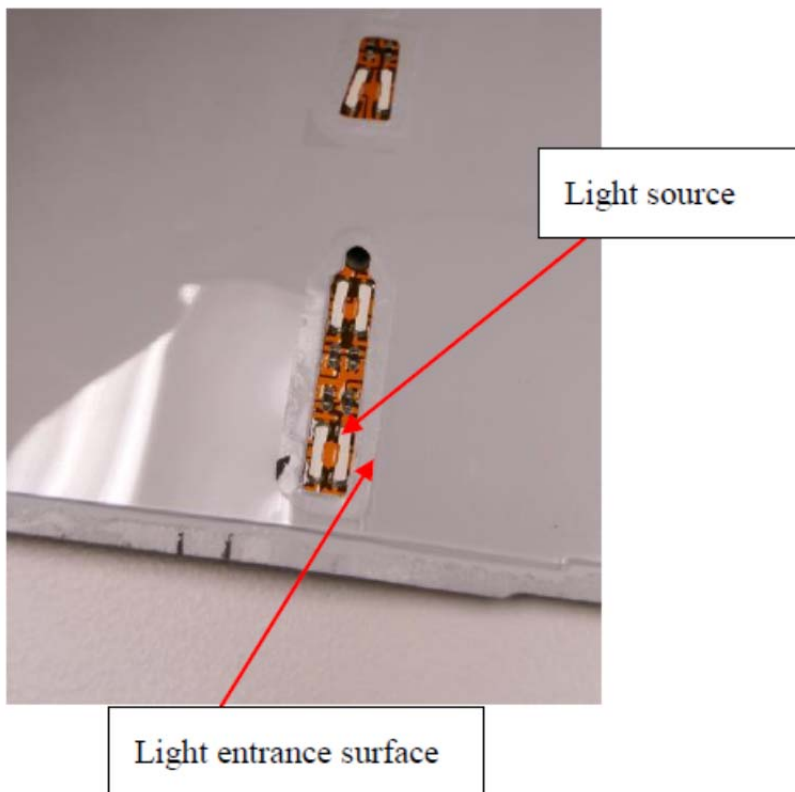
Top view of light guide



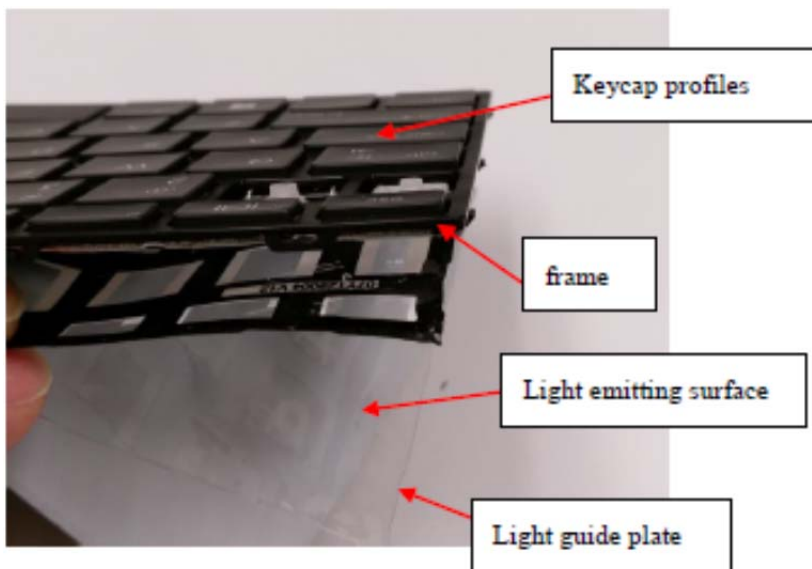
Bottom view of light guide



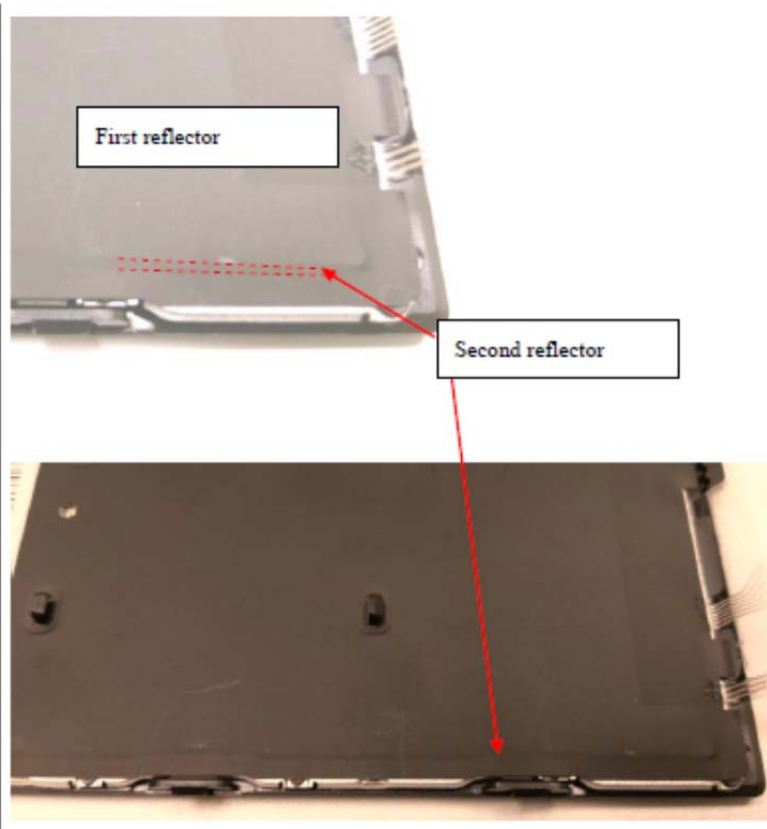
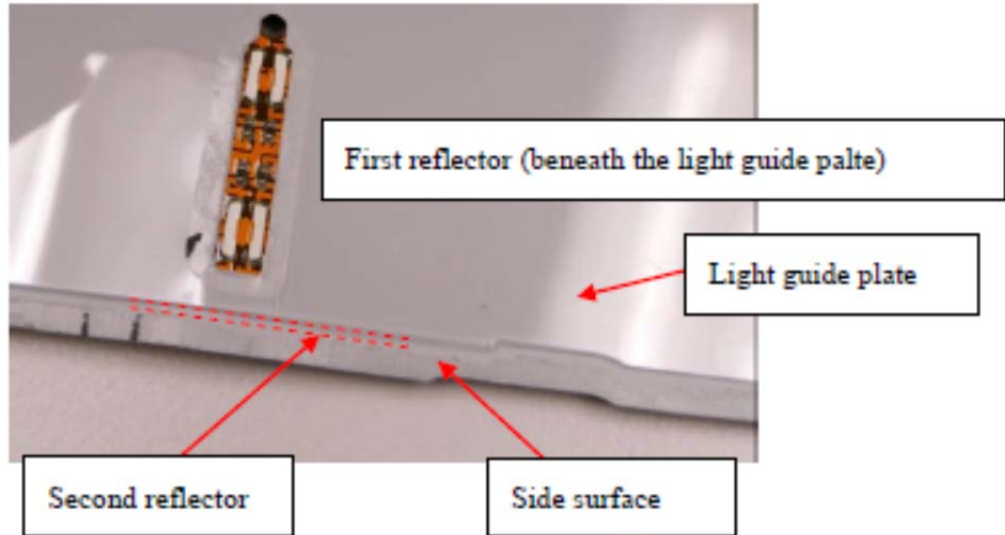
1 186. The HP ProBook 440 G5 keyboard also includes a light source disposed next to the
2 light entrance surface of the light guide plate:



16 187. The HP ProBook 440 G5 keyboard also includes a frame disposed on the light
17 emitting surface of the light guide plate:

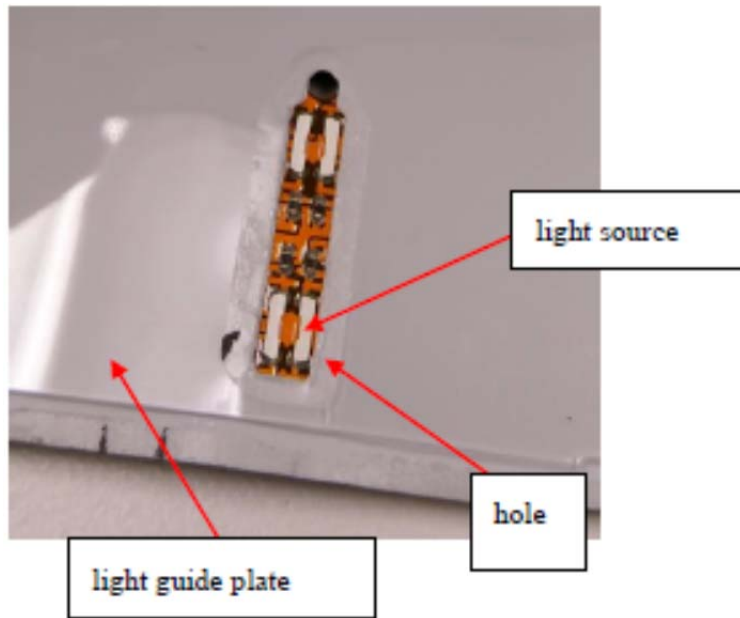


1 188. The HP ProBook 440 G5 keyboard also includes a first reflector, disposed on the
2 bottom surface of the light guide plate and a second reflector, disposed on the side surface of the
3 light guide plate:



27 189. The HP ProBook 440 G5 light guide plate is configured with a hole having the light
28 source received therein:

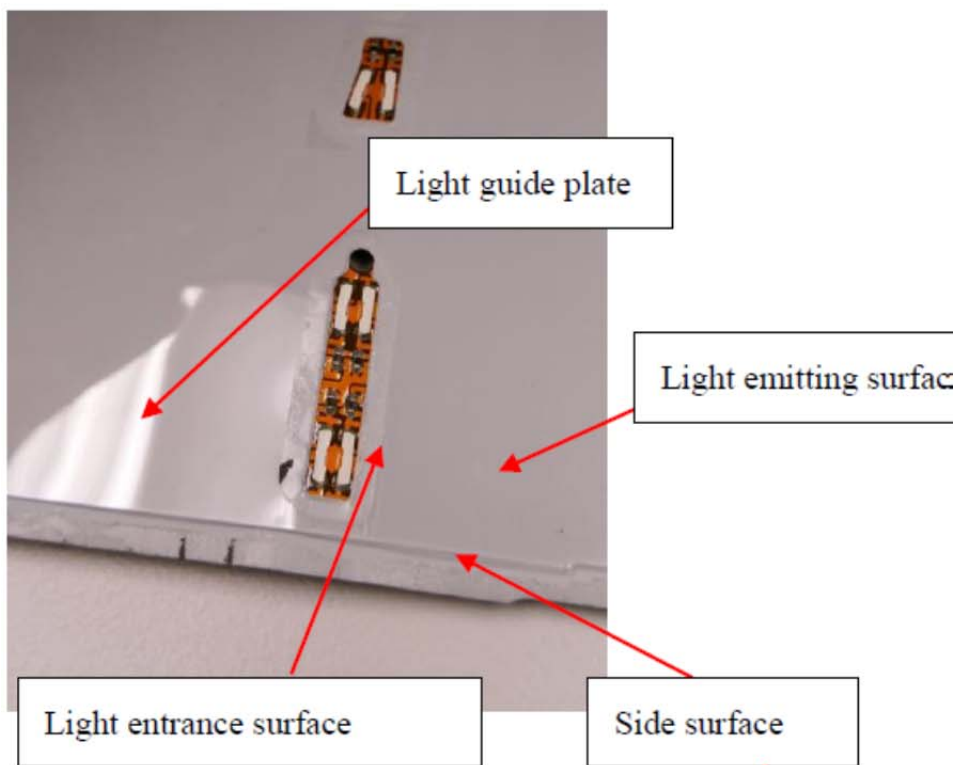
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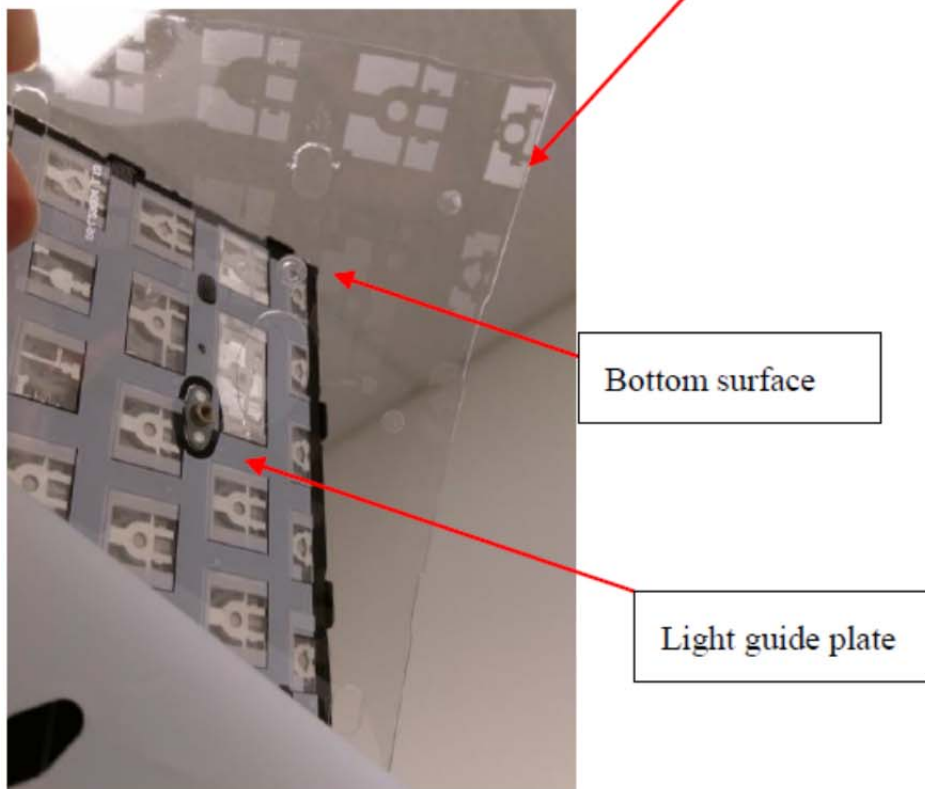
190. By way of further example, the HP ProBook 440 G5 keyboard also infringes Claim 20 of the '598 Patent because it is a light-emitting keyboard with a light guide plate, configured with a light entrance surface, a light emitting surface, a bottom surface and a side surface in a manner that the light emitting surface is arranged opposite to the bottom surface, and the light entrance surface and the side surface are arranged respectively next and connecting to the light emitting surfaced and the bottom surface while being sandwiched therebetween:

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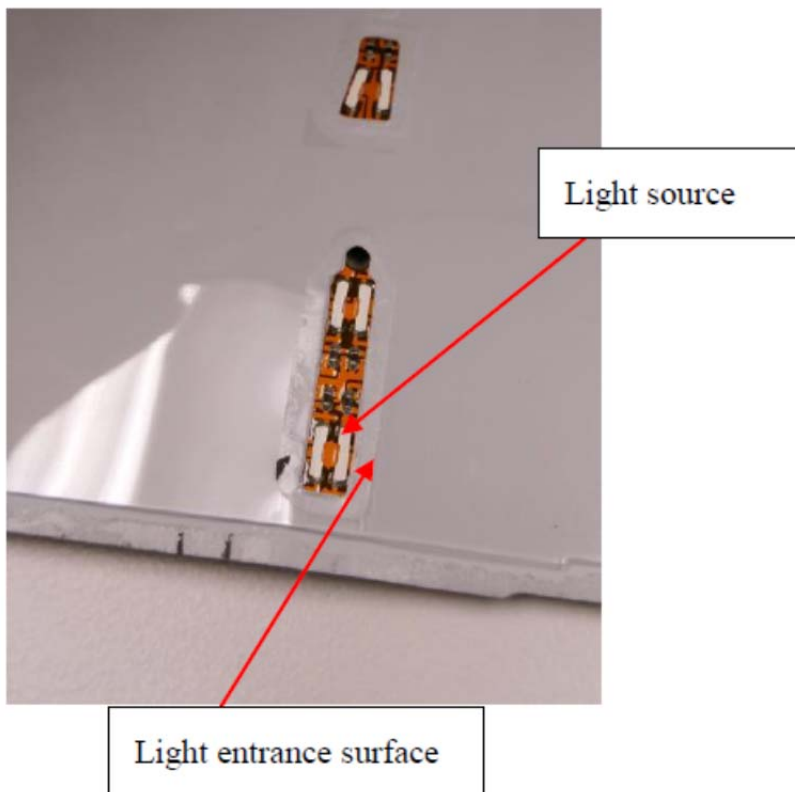
Top view of light guide



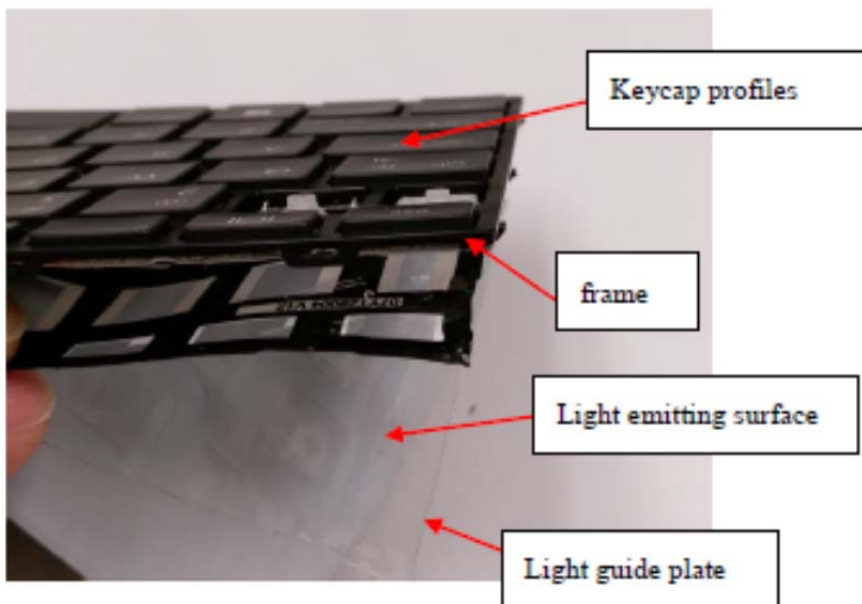
Bottom view of light guide



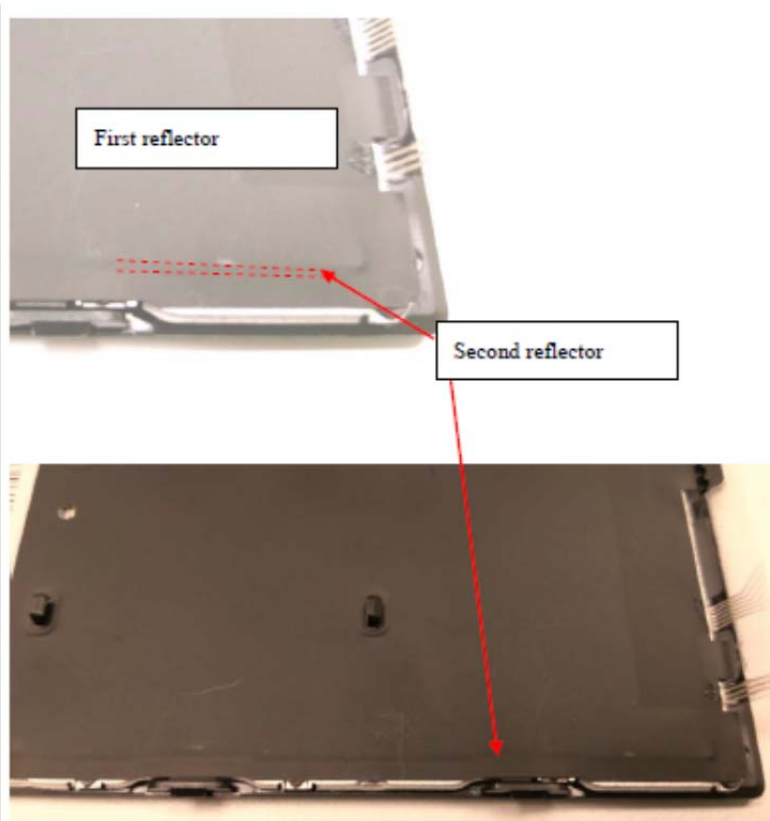
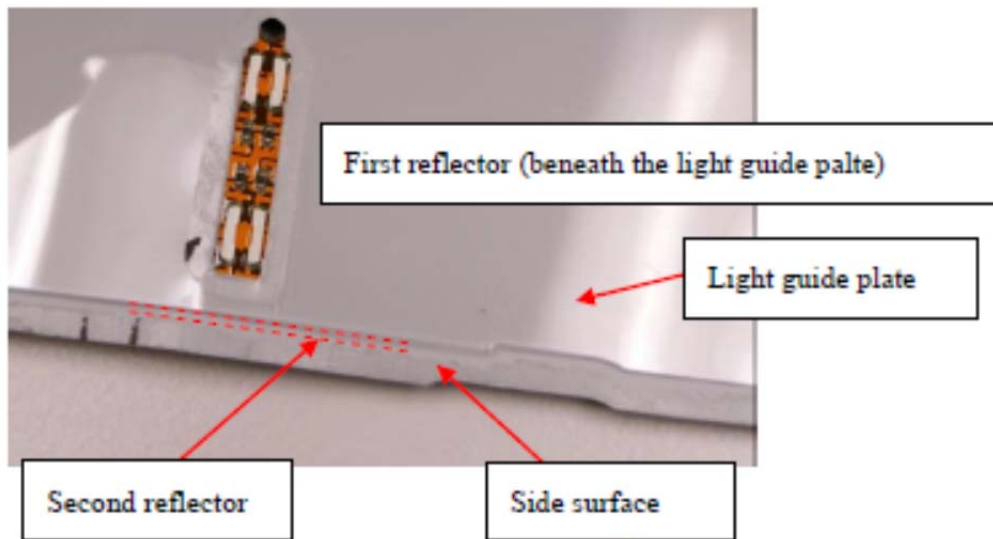
1 191. The HP ProBook 440 G5 keyboard also includes a light source disposed next to the
2 light entrance surface of the light guide plate:



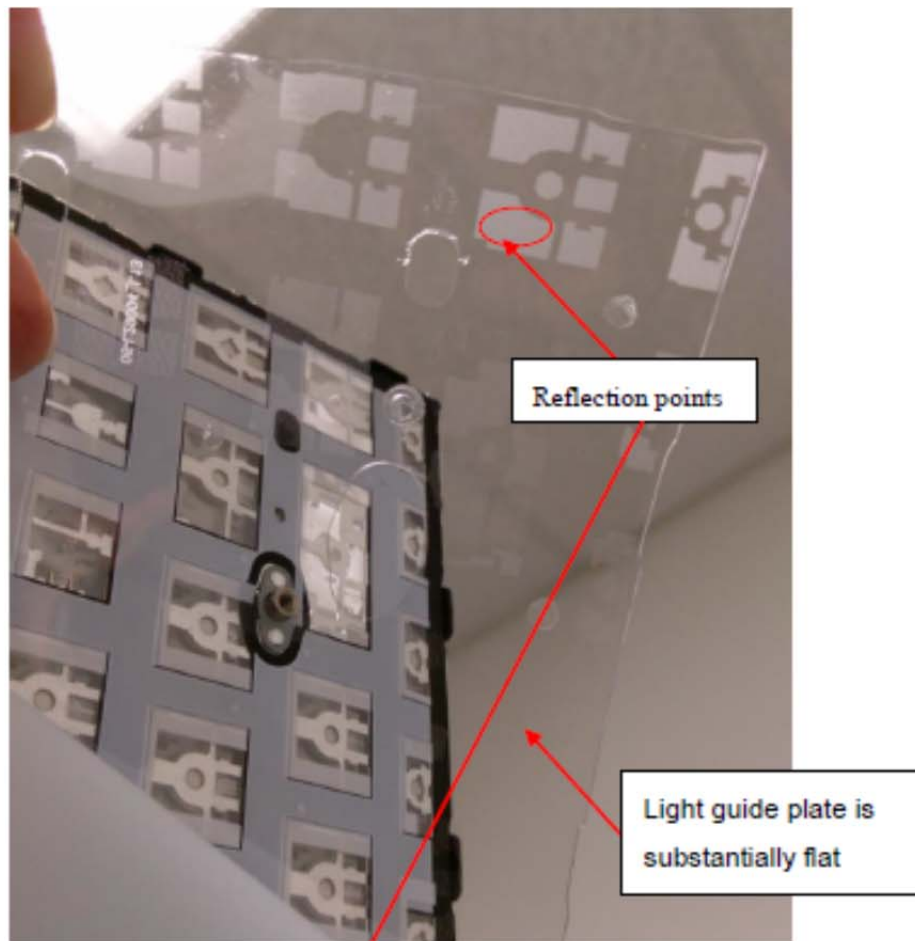
16 192. The HP ProBook 440 G5 keyboard also includes a frame disposed on the light
17 emitting surface of the light guide plate:



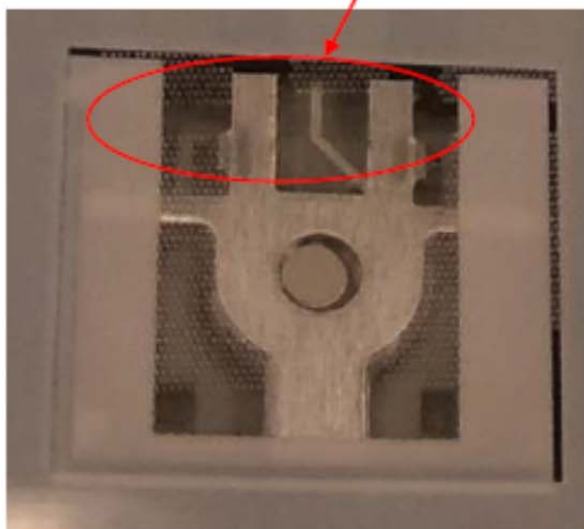
1 193. The HP ProBook 440 G5 keyboard also includes a first reflector, disposed on the
2 bottom surface of the light guide plate and a second reflector, disposed on the side surface of the
3 light guide plate:



1 194. The bottom surface of the HP ProBook 440 G5 light guide plate is substantially flat
2 and a plurality of reflection points are disposed on the bottom surface of the light guide plate:



18 bottom view



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2 195. Upon information and belief, the HP ProBook 440 G5 keyboard is manufactured by
3 Defendants. Upon information and belief, the serial numbers on the HP ProBook 440 G5 keyboard
4 correspond to Defendants' part numbers:



22 196. By making, using, offering for sale, selling, and/or importing the '598 Accused
23 Products that infringe the '598 Patent, Defendants are liable to Darfon for direct infringement of the
24 '598 Patent pursuant to 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents.

25 197. In addition, on information and belief, Defendants have induced and continue to
26 induce infringement of one more claims of the '598 Patent, including but not limited to Claims 1, 9,
27 10, 12, 18, and 20, pursuant to 35 U.S.C. § 271(b), by encouraging third parties such as users,
28 customers (e.g., HP), distributors, wholesalers, retailers, affiliates, parents, subsidiaries, importers, or

1 sellers to make, use, offer to sell, sell, and/or import into the United States without authorization the
 2 '598 Accused Products. The making, using, offering to sell, selling, and/or importing into the
 3 United States constitutes direct infringement, literally or under the doctrine of equivalents, of one or
 4 more claims of the '598 Patent by such third parties. Defendants' acts of inducement include:
 5 providing the '598 Accused Products or components thereof to third parties and intending them to
 6 make, use, offer to sell, sell, and/or import the '598 Accused Products; advertising the '598 Accused
 7 Products in the United States and encouraging; the sale and offer for sale of the '598 Accused
 8 Products by other entities (for example, https://us.liteon.com/en-global/Welcome/Landing_page and
 9 https://us.liteon.com/en-global/Info/Liteon_trading). Upon information and belief, Defendants are
 10 aware that third parties such as HP offer the '598 Accused Products for sale in the United States.
 11 For example, upon information and belief, third party HP offers the HP ProBook 440 G5, including
 12 keyboard, for sale in the United States at least through Amazon.com:



HP

HP Smart Buy ProBook
 440 G5 14" Notebook -
 Intel Core i5-8250U (8th
 Gen) Quad-Core 1.60
 GHz - 8 GB DDR4 SDRAM
 - 256 GB SSD - Windows
 10 Pro (2SS98UT)

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Available from these sellers.

- HP Smart Buy PB440G5 i5-8250U 14 8GB/256 PC Intel i5-8250U, 14.0 FHD AG LED UWVA, UMA, Webcam, 8GB DDR4, 256GB SSD, AC+BT, 3C Batt, FPR, W10 Pro64, 1yr Wrty

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 25 198. Defendants proceeded in this manner despite knowledge of the '598 Patent and their
 26 knowledge that specific actions they actively induced and continue to actively induce on the part of
 27 third parties constitute infringement of the '598 Patent. The Defendants had knowledge of the '598
 28 Patent and the infringement of the '598 Patent no later than Lite-On's receipt of Darfon's October 3,

1 2014 letter, as described in Paragraph 32. At the very least, because Defendants have been and
2 remain on notice of the '598 Patent and the accused infringement, they have been and remain
3 willfully blind regarding the infringement they have induced and continue to induce. Darfon and its
4 licensees have also complied with the marking provisions of 35. U.S.C. § 271 by marking their
5 products that practice the '598 Patent, either physically or through virtual marking, including at
6 <http://www.darfon.com/English/patents.asp>, thus providing notice to potential infringers.

7 199. Darfon has suffered and continues to suffer damages and irreparable harm as a result
8 of Defendants' infringement of the '598 Patent.

9 200. Defendants' infringement of the '598 Patent has been and continues to be willful,
10 deliberate, and in disregard of Darfon's patent rights. The Defendants had knowledge of the '598
11 Patent and the infringement of the '598 Patent no later than Lite-On's receipt of Darfon's October 3,
12 2014 letter, as described in Paragraph 32, and have proceeded to infringe the '598 Patent with full
13 knowledge of that patent and its applicability to Defendants' products. Defendants' intentional,
14 knowing, egregious, culpable, willful, wanton, malicious, bad faith, deliberate, consciously
15 wrongful, and/or flagrant infringement entitles Darfon to increased damages under 35 U.S.C. § 284
16 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

17 **COUNT VI**

18 **INFRINGEMENT OF U.S. PATENT NO. 9,875,864**

19 201. Plaintiff incorporates by reference Paragraphs 1 through 35 above as if fully set forth
20 herein.

21 202. Defendants make, use, offer for sale, sell, and/or import in the United States products
22 and/or services that have infringed and continue to infringe one or more claims of the '864 Patent,
23 including but not limited to Claims 1 and 3 pursuant to 35 U.S.C. § 271(a), literally or under the
24 doctrine of equivalents. Defendants' infringing products include, for example and without
25 limitation, all versions and variations, including predecessor and successor models, of the HP
26 ProBook 440 G5 keyboard (SG-87710-XUA) ("HP ProBook 440 G5 keyboard"), which, on
27 information and belief, Defendants manufacture for HP, and any other similar products that infringe
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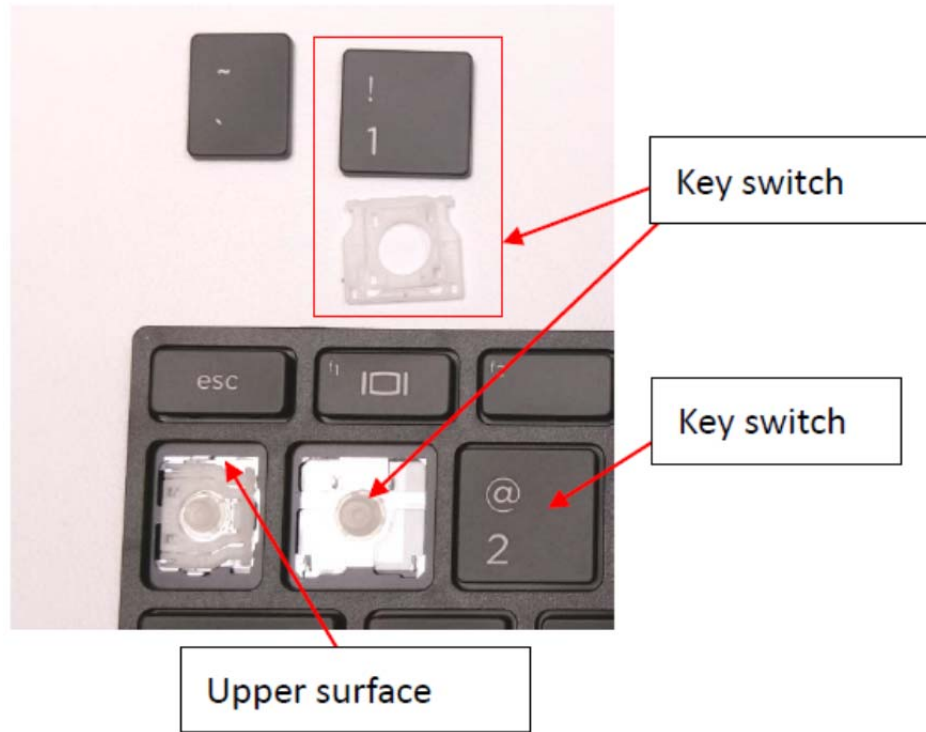
1 at least one claim of the '864 Patent. Defendants' infringing products are collectively referred to
2 hereinafter as "the '864 Accused Products."

3 203. The '864 Accused Products are covered by one or more claims of the '864 Patent,
4 including at least Claims 1 and 3, because they contain each element of those claims.

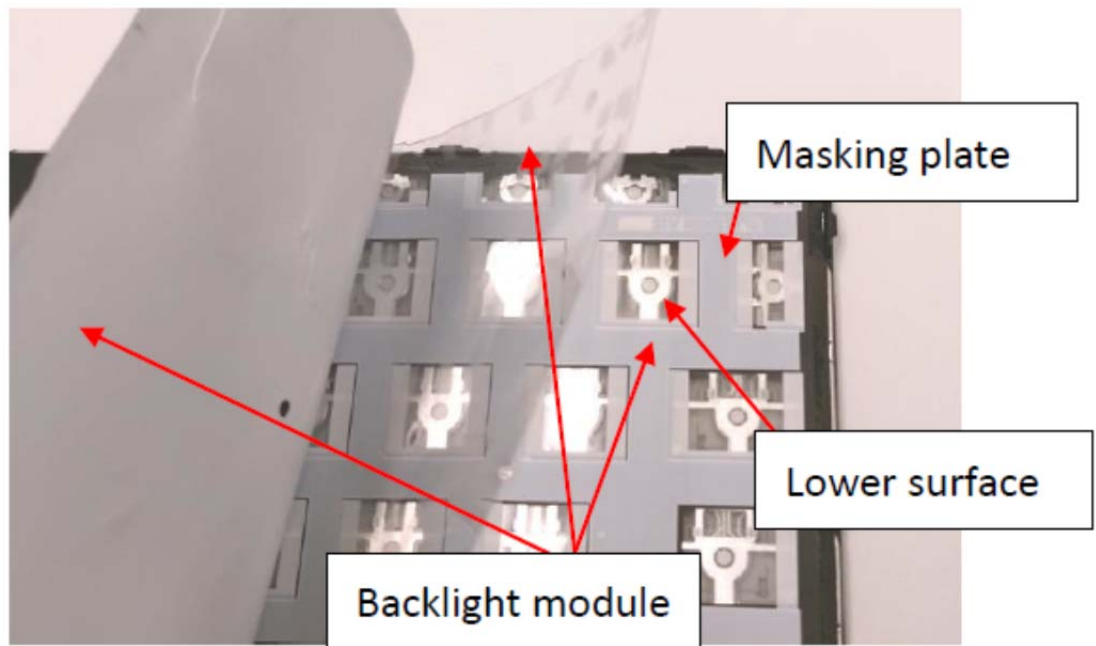
5 204. By way of example, the HP ProBook 440 G5 keyboard infringes Claim 1 of the '864
6 Patent because it includes a backlight module adapted to a keyboard, the keyboard comprising a base
7 plate and a plurality of key switches, the base plate having an upper surface and a lower surface, and
8 a plurality of keys being disposed on the upper surface:



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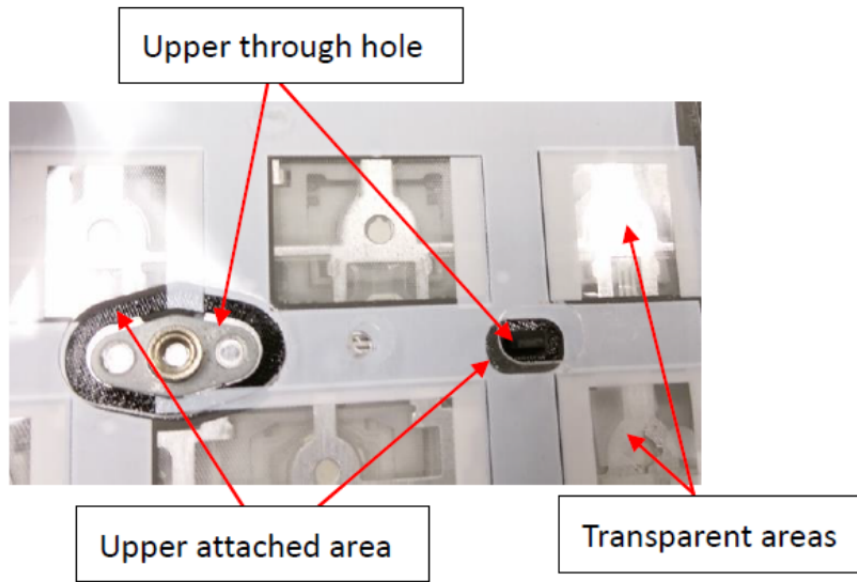


205. The HP ProBook 440 G5 keyboard also has a backlight module comprising a masking plate disposed on the lower surface:



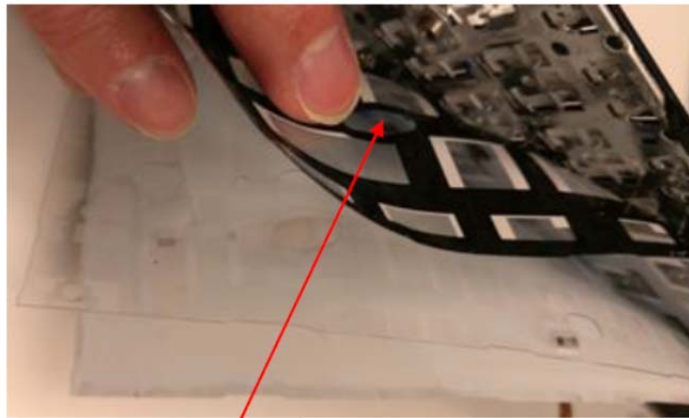
206. The backlight module of the HP ProBook 440 G5 keyboard also comprises a plurality of upper through holes being formed in the masking plate, an upper attached area being defined by a

1 periphery of each of the upper through holes, a plurality of transparent areas being formed on the
2 masking plate:

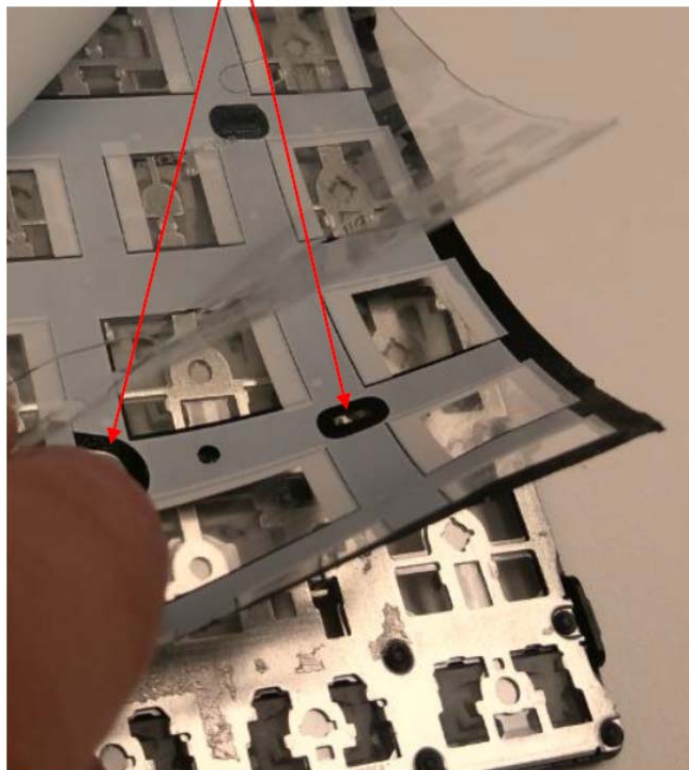


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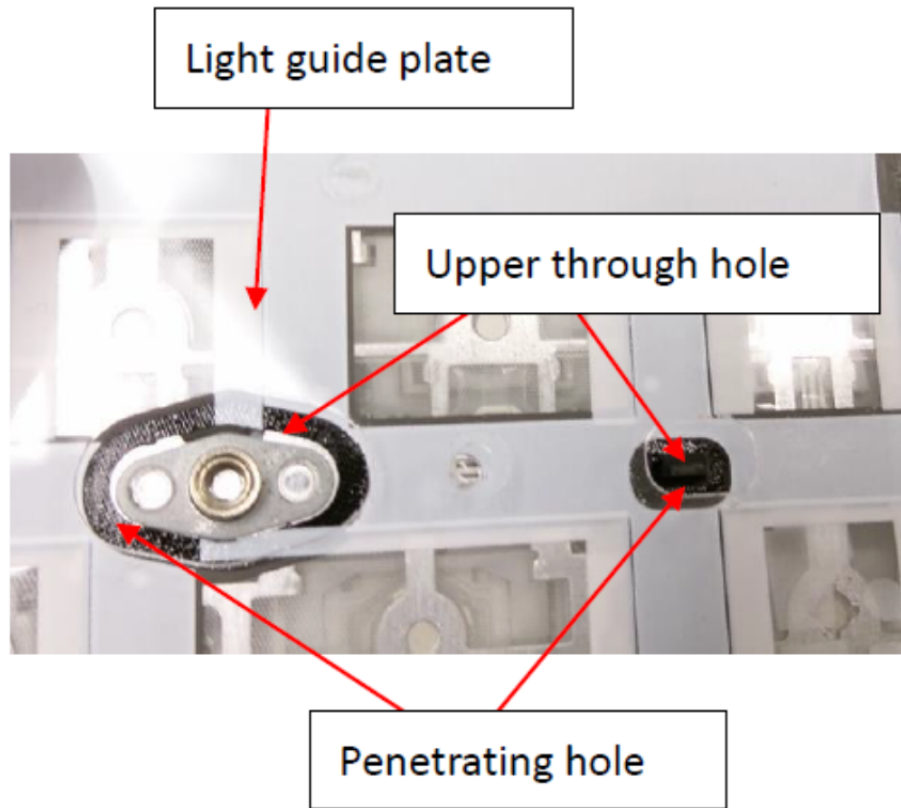


Upper through hole

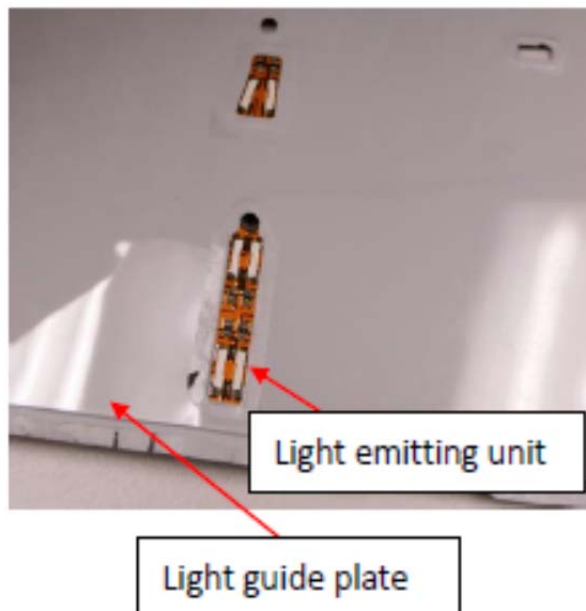


207. The HP ProBook 440 G5 keyboard also includes a light guiding plate disposed below the masking plate, a plurality of penetrating holes being formed in the light guiding plate and located corresponding to the plurality of upper through holes:

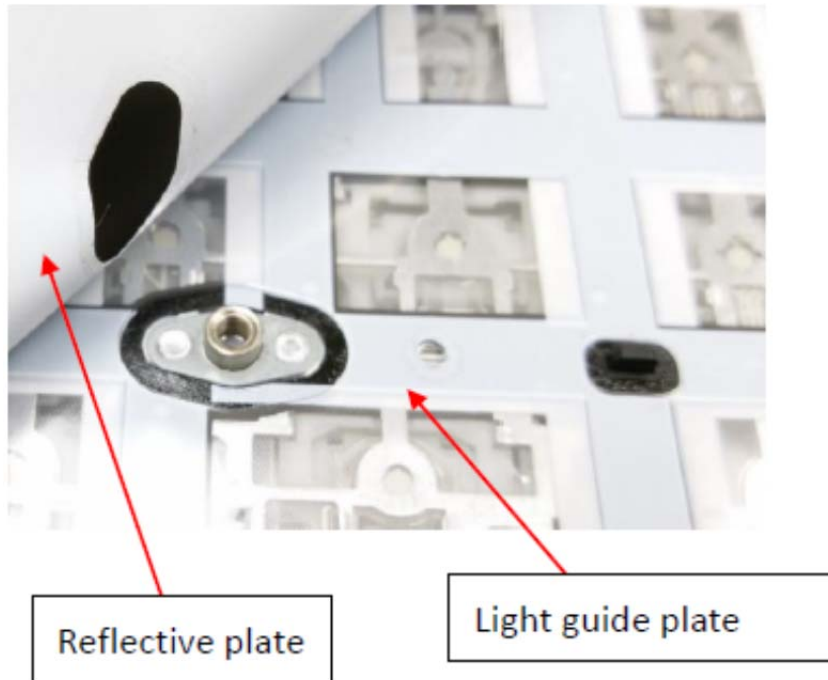
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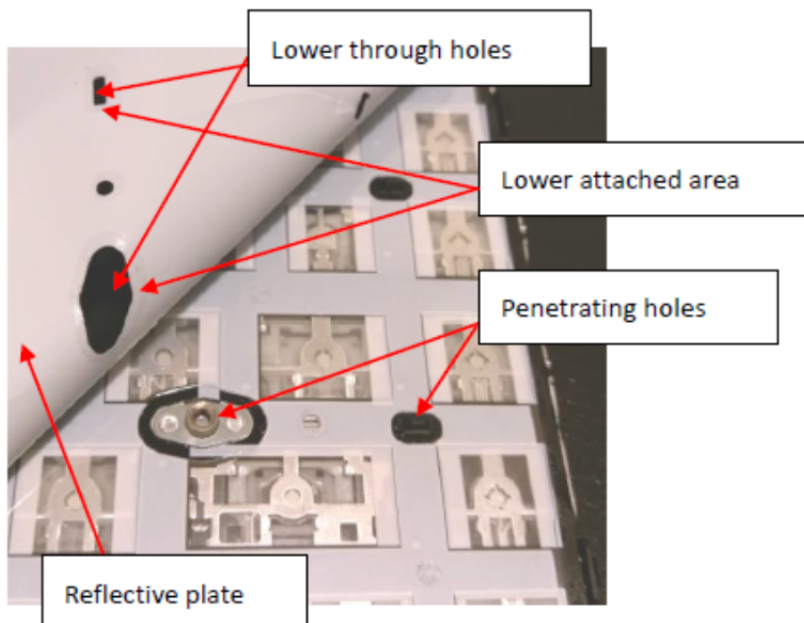
208. The HP ProBook 440 G5 keyboard also includes a light emitting unit located on a lateral side of the light guiding plate and for emitting a light into the light guiding plate, the light guiding plate guiding part of the light to emit via the plurality of transparent areas:



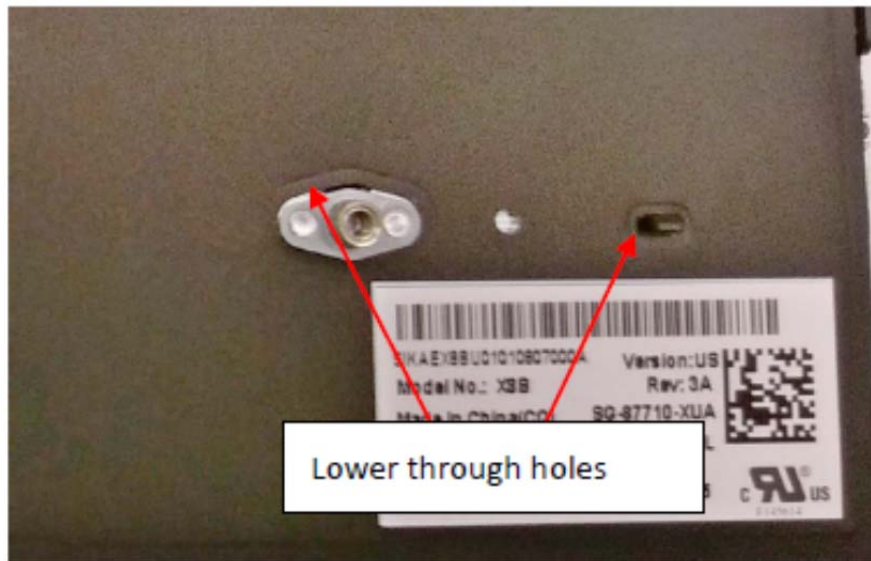
1 209. The HP ProBook 440 G5 keyboard also includes a reflective plate disposed below the
2 light guiding plate and for reflecting the light guided toward the reflective plate by the light guiding
3 plate:



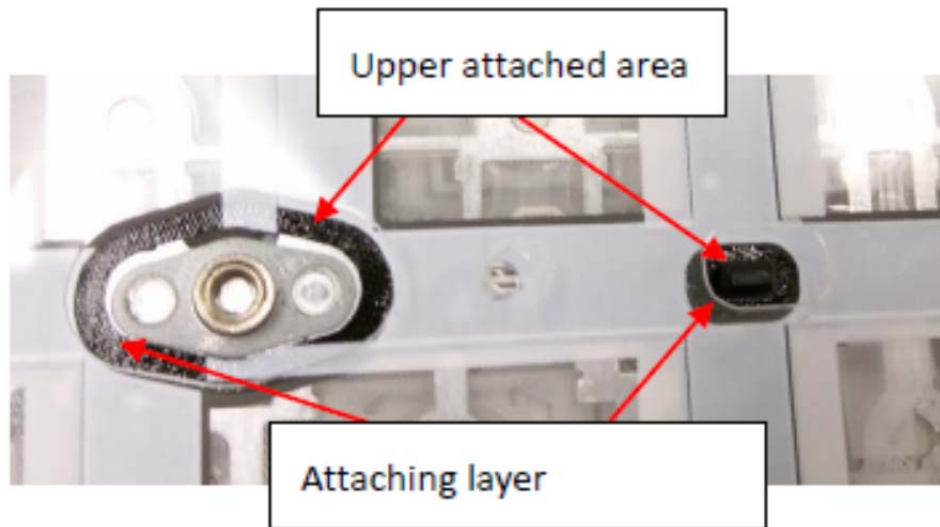
16 210. The HP ProBook 440 G5 keyboard also includes a plurality of through holes being
17 formed in the reflective plate and located corresponding to the plurality of penetrating holes, a lower
18 attached area being defined by a periphery of each of the lower through holes:



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211. The HP ProBook 440 G5 keyboard also includes an attaching layer disposed between the upper attached area and the lower attached area:



212. In the HP ProBook 440 G5 keyboard, the sum over a thickness of the upper attached area, a thickness of the lower attached area, and a thickness of the attaching layer is smaller than the thickness of the light guiding plate:

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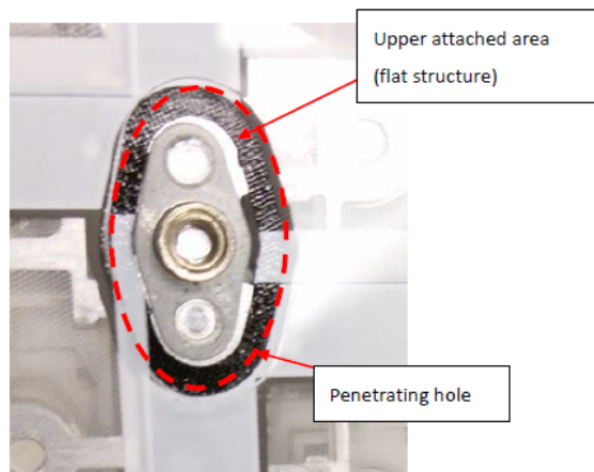
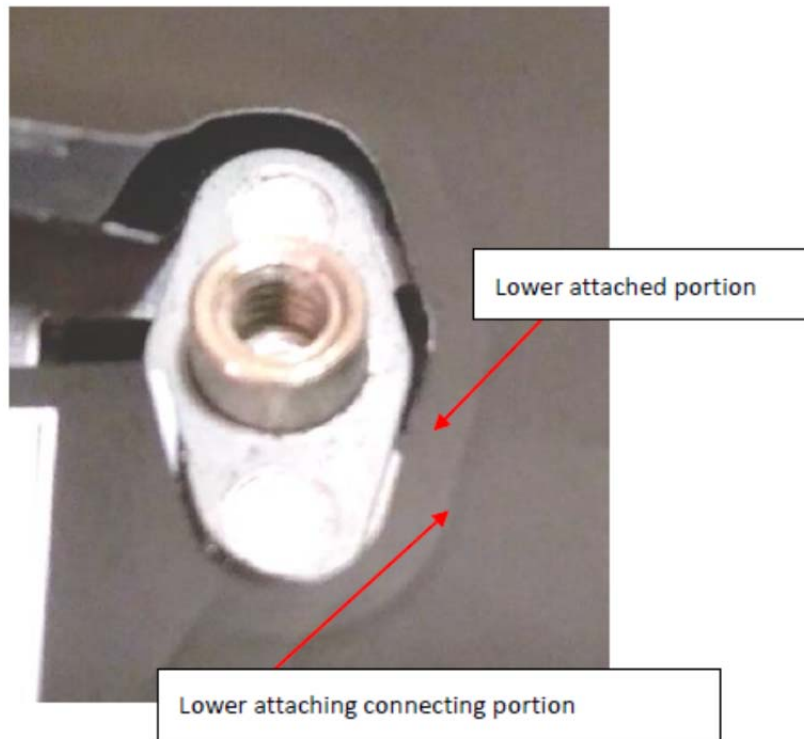


a sum over a thickness of the upper attached area, a thickness of the lower attached area and a thickness of the attaching layer



Thickness of Light guide plate

1 213. By way of further example, the HP ProBook 440 G5 keyboard also infringes Claim 3
2 of the '864 Patent because its upper attached area is a flat structure and its lower attached area
3 comprises a lower attached portion disposed in the penetrating hole, the attaching layer attaching the
4 flat structure with the lower attached portion, and a lower attaching connecting portion connecting
5 the lower attached portion and the reflective plate and being located in the penetrating hole:



1 214. Upon information and belief, the HP ProBook 440 G5 keyboard is manufactured by
2 Defendants. Upon information and belief, the serial numbers on the HP ProBook 440 G5 keyboard
3 correspond to Defendants' part numbers:



21 215. By making, using, offering for sale, selling, and/or importing the '864 Accused
22 Products that infringe the '864 Patent, Defendants are liable to Darfon for direct infringement of the
23 '864 Patent pursuant to 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents.

24 216. In addition, on information and belief, Defendants have induced and continue to
25 induce infringement of one more claims of the '598 Patent, including but not limited to Claims 1 and
26 3, pursuant to 35 U.S.C. § 271(b), by encouraging third parties such as users, customers (e.g., HP),
27 distributors, wholesalers, retailers, affiliates, parents, subsidiaries, importers, or sellers to make, use,
28 offer to sell, sell, and/or import into the United States without authorization the '864 Accused

1 Products. The making, using, offering to sell, selling, and/or importing into the United States
 2 constitutes direct infringement, literally or under the doctrine of equivalents, of one or more claims
 3 of the '864 Patent by such third parties. Defendants' acts of inducement include: providing the '864
 4 Accused Products or components thereof to third parties and intending them to make, use, offer to
 5 sell, sell, and/or import the '864 Accused Products; advertising the '864 Accused Products in the
 6 United States and encouraging; the sale and offer for sale of the '864 Accused Products by other
 7 entities (for example, https://us.liteon.com/en-global/Welcome/Landing_page and
 8 https://us.liteon.com/en-global/Info/Liteon_trading). Upon information and belief, Defendants are
 9 aware that third parties such as HP offer the '864 Accused Products for sale in the United States.
 10 For example, upon information and belief, third party HP offers the HP ProBook 440 G5, including
 11 keyboard, for sale in the United States at least through Amazon.com:



HP

HP Smart Buy ProBook
 440 G5 14" Notebook -
 Intel Core i5-8250U (8th
 Gen) Quad-Core 1.60
 GHz - 8 GB DDR4 SDRAM
 - 256 GB SSD - Windows
 10 Pro (2SS98UT)

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Available from these sellers.

- HP Smart Buy PB440G5 i5-8250U 14 8GB/256 PC Intel i5-8250U, 14.0 FHD AG LED UWVA, UMA, Webcam, 8GB DDR4, 256GB SSD, AC+BT, 3C Batt, FPR, W10 Pro64, 1yr Wrtty

23 217. Defendants proceeded in this manner despite knowledge of the '864 Patent and their
 24 knowledge that specific actions they actively induced and continue to actively induce on the part of
 25 third parties constitute infringement of the '864 Patent. The Defendants had knowledge of the '864
 26 Patent and the infringement of the '864 Patent no later than service of this Complaint, as described in
 27 Paragraph 35. Darfon and its licensees have also complied with the marking provisions of 35.
 28

1 U.S.C. § 271 by marking their products that practice the '864 Patent, either physically or through
2 virtual marking, including at <http://www.darfon.com/English/patents.asp>, thus providing notice to
3 potential infringers.

4 218. Darfon has suffered and continues to suffer damages and irreparable harm as a result
5 of Defendants' infringement of the '864 Patent.

6 **PRAYER FOR RELIEF**

7 Plaintiff respectfully prays for relief as follows:

- 8 A. a judgment that Defendants have infringed one or more claims of the '939 Patent;
9 B. a judgment that Defendants have infringed and continue to infringe one or more claims of
10 the '222 Patent;
11 C. a judgment that Defendants have infringed and continue to infringe one or more claims of
12 the '012 Patent;
13 D. a judgment that Defendants have infringed and continue to infringe one or more claims of
14 the '612 Patent;
15 E. a judgment that Defendants have infringed and continue to infringe one or more claims of
16 the '598 Patent;
17 F. a judgment that Defendants have infringed and continue to infringe one or more claims of
18 the '864 Patent;
19 G. a judgment that Defendants have induced infringement of one or more claims of the '939
20 Patent;
21 H. a judgment that Defendants have induced infringement and continue to induce
22 infringement of one or more claims of the '222 Patent;
23 I. a judgment that Defendants have induced infringement and continue to induce
24 infringement of one or more claims of the '012 Patent;
25 J. a judgment that Defendants have induced infringement and continue to induce
26 infringement of one or more claims of the '612 Patent;
27 K. a judgment that Defendants have induced infringement and continue to induce
28 infringement of one or more claims of the '598 Patent;

- 1 L. a judgment that Defendants have induced infringement and continue to induce
2 infringement of one or more claims of the '864 Patent;
- 3 M. a judgment that Defendants have willfully infringed one or more claims of the '939
4 Patent;
- 5 N. a judgment that Defendants have willfully infringed one or more claims of the '222
6 Patent;
- 7 O. a judgment that Defendants have willfully infringed one or more claims of the '612
8 Patent;
- 9 P. a judgment that Defendants have willfully infringed one or more claims of the '598
10 Patent;
- 11 Q. a permanent injunction enjoining Defendants from infringing the '222 Patent;
- 12 R. a permanent injunction enjoining Defendants from infringing the '012 Patent;
- 13 S. a permanent injunction enjoining Defendants from infringing the '612 Patent;
- 14 T. a permanent injunction enjoining Defendants from infringing the '598 Patent;
- 15 U. a permanent injunction enjoining Defendants from infringing the '864 Patent;
- 16 V. a judgment awarding Plaintiffs all damages adequate to compensate for Defendants'
17 infringement, and in no event less than a reasonable royalty for Defendants'
18 infringement, including all pre-judgment and post-judgment interest at the maximum rate
19 allowed by law;
- 20 W. a judgment awarding Plaintiffs treble damages pursuant to 35 U.S.C. § 284 as a result of
21 Defendants' willful conduct;
- 22 X. a judgment and order finding that this is an exceptional case within the meaning of 35
23 U.S.C. § 285 and awarding Plaintiffs their reasonable attorneys' fees and costs incurred
24 in connection with this action; and
- 25 Y. for such additional and further relief in law and equity, as the Court may deem just and
26 proper.
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JURY DEMAND

Pursuant to Rule 38(b), Plaintiff demands a trial by jury of this action.

Dated: June 15, 2018

Respectfully Submitted,

/s/ Harold H. Davis, Jr.

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