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19 *Attorneys for Plaintiff Universal Transdata, LLC*

20 **UNITED STATES DISTRICT COURT**  
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 UNIVERSAL TRANSDATA, LLC,

23 Plaintiff,

24 vs.

25 INLAND PRODUCTS, INC.

26 Defendant.

27 Case No.: 8:18-cv-01232

28 **COMPLAINT FOR INFRINGEMENT  
OF U.S. PATENT NO. 7,028,114**

**DEMAND FOR JURY TRIAL**

1 **COMPLAINT FOR PATENT INFRINGEMENT**

2 Plaintiff UNIVERSAL TRANSDATA, LLC (“Universal” or “Plaintiff”) files this  
3 Complaint for Patent Infringement against Defendant INLAND PRODUCTS, INC.  
4 (“Inland” or “Defendant”), and states as follows:

5 **THE PARTIES**

6 1. Plaintiff is a limited liability company organized and existing under the laws  
7 of the State of Georgia, having its principal office at 3930 E. Jones Bridge Road, Suite  
8 140, Peachtree Corners, GA 30092.

9 2. Upon information and belief, Defendant INLAND PRODUCTS, INC. is a  
10 company organized under the laws of the State of California having a principal place of  
11 business at 1410 E. Walnut Ave., Fullerton, CA 92831. Defendant’s registered agent in  
12 the State of California is Mian Wantl, 1410 E. Walnut Ave., Fullerton, CA 92831.

13 **JURISDICTION AND VENUE**

14 3. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1  
15 et seq., including, without limitation, 35 U.S.C. §§ 271, 281, 284, and 285. As a result,  
16 this Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. §§ 1331  
17 and 1338(a).

18 4. This Court has personal jurisdiction over Defendant on the grounds that  
19 Defendant operates, conducts, engages in, and/or carries on a business in this state and  
20 maintains an office or agency in this state, and/or has committed acts of patent  
21 infringement in this state. Defendant has minimum contacts with the State of California,  
22 and Defendant has purposefully availed itself of the privileges of conducting business in  
23 the State of California, including through maintaining a regular and established place of  
24 business in this judicial district, and through the sale and offer for sale of the Accused  
25 Products throughout the State of California and this judicial district at least through  
26 various online retailers, including Amazon.com and www.inlandproduct.com, which are  
27 accessible throughout the United States. On information and belief, the Accused  
28 Products have been sold in the State of California and in this judicial district.

1 5. Venue is proper in this Court pursuant to 28 U.S.C. § 1400(b) on the  
2 grounds that Defendant is a California corporation with a registered office in this judicial  
3 district, and on the grounds that Defendant has committed acts of infringement in this  
4 judicial district and has a regular and established place of business in this judicial district.

5 **FACTUAL BACKGROUND**

6 6. Plaintiff is the owner by assignment of all right, title and interest in and to  
7 United States Patent Number 7,028,114, entitled Universal Serial Bus Hub with Wireless  
8 Communication to Remote Peripheral Device (“the ’114 Patent”), including the right to  
9 sue for all past, present, and future infringement, which assignment was duly recorded in  
10 the United States Patent and Trademark Office (“USPTO”).

11 7. A true and correct copy of the ’114 Patent is attached hereto as **Exhibit A**.

12 8. The application that became the ’114 Patent was filed on August 4, 2000,  
13 and assigned U.S. patent application number 09/632,466 (“the ’466 Application”).

14 9. The ’114 Patent issued on April 11, 2006, after full and fair examination by  
15 the United States Patent Office.

16 10. The ’114 Patent is valid and enforceable.

17 11. The term of the ’114 Patent extends through May 24, 2021.

18 12. The ’114 Patent is directed to “a USB hub with capability to communicate  
19 with a plurality of remote wireless peripheral devices without the need to physically  
20 connect the peripheral devices to the hub via a cable connection.”

21 13. The invention of the ’114 Patent provides the further advantage of a simple  
22 hardware design due to the capability of communicating with multiple remote peripheral  
23 devices through a single radio-frequency receiver located on the USB hub.

24 14. Claim 1 of the ’114 Patent claims:

25 1. A wireless system for operating a computer having a USB  
26 port comprising:

27 a remote wireless peripheral device having a circuit for  
28 generating device information causing associated operations to  
be performed by the computer and an RF transmitter connected

1 to said circuit for transmitting a wireless signal including said  
2 device information, said circuit and said RF transmitter being  
3 integral to said peripheral device, said RF transmitter being the  
4 sole means for communicating said device information from  
5 said peripheral device, wherein said associated operations are  
6 not triggered by wireless telephony and said peripheral device  
7 not having any USB communication capability, said peripheral  
8 device being one of a keyboard, a mouse and a joystick; and

9 a Universal Serial Bus (USB) hub including an upstream USB  
10 port adapted to be connected to the computer, and a hub  
11 controller connected between said data reception circuit and  
12 said upstream USB port whereby when said upstream USB port  
13 is connected to the USB port of the computer and said  
14 peripheral device generates said wireless signal to said data  
15 reception circuit, said hub controller converts said wireless  
16 signal to a USB data signal and passes said USB data signal to  
17 said upstream port for causing the associated operations to be  
18 performed by the computer.

19 15. Claim 2 of the '114 Patent claims:

20 2. The wireless system according to claim 1 wherein said peripheral device  
21 is a keyboard and including a mouse having a circuit for generating device  
22 information causing associated operations to be performed by the computer  
23 and an RF transmitter connected to said circuit for transmitting a wireless  
24 signal including said device information, said circuit and said RF transmitter  
25 being integral to said mouse, said RF transmitter being the sole means for  
26 communicating said device information from said mouse and said mouse not  
27 having any USB communication capability, wherein said associated  
28 operations are not triggered by wireless telephony and said hub having  
means to distinguish between said keyboard wireless signal and said mouse  
wireless signal.

16. Claim 3 of the '114 Patent claims:

3. A wireless system for operating a computer having a USB  
port comprising:

a remote wireless peripheral device having a circuit for  
generating device information causing associated operations to  
be performed by the computer and an RF transmitter connected  
to said circuit for transmitting a wireless signal including said  
device information, said circuit and said RF transmitter being

1 integral to said peripheral device, said RF transmitter being the  
2 sole means for communicating said device information from  
3 said peripheral device, wherein said associated operations are  
4 not triggered by wireless telephony and said peripheral device  
5 not having any USB communication capability; and

6 a Universal Serial Bus (USB) hub including an upstream USB  
7 port adapted to be connected to the computer, and a hub  
8 controller connected between said data reception circuit and  
9 said upstream USB port whereby when said upstream USB port  
10 is connected to the USB port of the computer and said  
11 peripheral device generates said wireless signal to said data  
12 reception circuit, said hub controller converts said wireless  
13 signal to a USB data signal and passes said USB data signal to  
14 said upstream port for causing the associated operations to be  
15 performed by the computer.

12 17. Claim 4 of the '114 Patent claims:

13 4. The wireless system according to claim 3 wherein said data  
14 reception circuit further includes an RF receiver for receiving  
15 said wireless signal from said peripheral device.

16 18. Claim 5 of the '114 Patent claims:

17 5. The wireless system according to claim 4 wherein said data  
18 reception circuit further includes a signal discriminator  
19 connected between said RF receiver and said hub controller for  
20 receiving said wireless signal from said RF receiver and  
21 presenting said device information in said wireless signal to  
22 said hub controller.

21 19. Claim 6 of the '114 Patent claims:

22 6. The wireless system according to claim 5 wherein said hub  
23 controller further includes a serial interface engine connected to  
24 said signal discriminator for converting said device information  
25 into USB format to form said USB data signal.

25 20. Claim 9 of the '114 Patent claims:

26 9. A wireless Universal Serial Bus (USB) hub and remote  
27 wireless peripheral devices for communication with a computer  
28 having a USB port comprising: at least two remote wireless  
peripheral devices each having a circuit for generating device

1 information related to operations performed by said peripheral  
2 device and an RF transmitter connected to said circuit for  
3 transmitting a wireless signal including said device information,  
4 said circuits and said RF transmitters being integral to said  
5 peripheral devices, said RF transmitters being the sole means  
6 for communicating said device information from said peripheral  
7 devices, wherein said associated operations are not triggered by  
8 wireless telephony and said peripheral devices not having any  
9 USB communication capability, said at least two remote  
10 peripheral devices including a keyboard and a mouse;

11 a data reception circuit for receiving said wireless signals from  
12 said RF transmitters; an upstream USB port adapted to be  
13 connected to the computer;

14 and a hub controller connected between said data reception  
15 circuit and said upstream USB port whereby when said  
16 upstream USB port is connected to the USB port of the  
17 computer and said peripheral devices generate said wireless  
18 signals to said data reception circuit, said hub controller  
19 converts each of said wireless signals to a USB data signal and  
20 passes said USB data signal to said upstream port for  
21 communication of said device information to the computer for  
22 controlling operations of the computer.

23 21. Plaintiff notified Defendant of the '114 Patent and Defendant's infringement  
24 of the '114 Patent prior to filing this action.

25 **COUNT I – DIRECT PATENT INFRINGEMENT**

26 22. Plaintiff realleges and incorporates by reference the allegations set forth  
27 above, as if set forth verbatim herein.

28 23. Defendant has directly infringed at least claims 1, 2, 3, 4, 5, 6, and 9 of the  
'114 patent in violation of 35 U.S.C. § 271(a) by making, importing, using, selling, or  
offering for sale in the United States products that embody the patented invention, and  
Defendant will continue to do so unless enjoined by this court.

24 24. Defendant's infringing products include, without limitation, its Pro wireless  
25 2.4 GHz optical mouse and keyboard combo, and other as-yet-unknown products that  
26 similarly satisfy each element of each asserted claim (collectively, "Accused Products").

1 25. The Accused Products satisfy each and every element of each asserted claim  
2 of the '114 Patent, as detailed in the preliminary claim chart attached hereto as **Exhibit**  
3 **B**, and incorporated herein by reference, either literally or under the doctrine of  
4 equivalents.

5 26. Defendant's infringing activities are and have been without authority or  
6 license under the '114 Patent.

7 27. Defendant has had actual knowledge of the '114 Patent and Plaintiff's  
8 claims of infringement prior to the filing of this action, at least since receiving pre-suit  
9 notice of the '114 Patent from Plaintiff.

10 28. Defendant's infringement of the '114 Patent has been, and continues to be,  
11 willful and deliberate.

12 29. Plaintiff is entitled to recover from Defendant the damages sustained by  
13 Plaintiff as a result of Defendant's infringing acts in an amount subject to proof at trial,  
14 which, by law, cannot be less than a reasonable royalty, together with interest and costs  
15 as fixed by this Court, pursuant to 35 U.S.C. § 284.

16 30. Defendant's past and continuing infringement of the '114 Patent has  
17 irreparably harmed, and continues irreparably to harm, Plaintiff.

18 31. Defendant's infringing activities will continue unless enjoined by this Court  
19 pursuant to 35 U.S.C. § 283.

20 **COUNT II – INDUCED PATENT INFRINGEMENT**

21 32. Plaintiff realleges and incorporates by reference the allegations set forth  
22 above, as if set forth verbatim herein.

23 33. Defendant has actively and intentionally, with prior knowledge of the '114  
24 Patent and Plaintiff's claims of infringement, induced the direct infringement by others of  
25 at least claims 1, 2, 3, 4, 5, 6, and 9 of the '114 Patent in violation of 35 U.S.C. § 271(b),  
26 in making, importing, using, selling, or offering for sale in the United States Accused  
27 Products that embody the patented invention as described in Count I, above.  
28

1 **JURY DEMAND**

2 34. Plaintiff hereby demands a trial by jury of all issues so triable pursuant to  
3 Fed. R. Civ. P. 38.

4 **PRAAYER FOR RELIEF**

5 Plaintiff respectfully requests that the Court find in its favor and against Defendant,  
6 and that the Court grant Plaintiff the following relief:

- 7 A. An adjudication that one or more claims of the '114 Patent have been  
8 infringed, either literally and/or under the doctrine of equivalents, by  
9 Defendant;
- 10 B. A permanent injunction pursuant to 35 U.S.C. § 283, enjoining Defendant  
11 from further acts of infringement with respect to the claims of the '114  
12 Patent;
- 13 C. An accounting and an award to Plaintiff of damages adequate to compensate  
14 Plaintiff for the Defendant's acts of infringement, together with pre-  
15 judgment and post-judgment interest and costs pursuant to 35 U.S.C. § 284;
- 16 D. That Defendant's infringement be found to be willful, and that the Court  
17 award enhanced damages pursuant to 35 U.S.C. § 284;
- 18 E. That this Court declare this to be an exceptional case and award Plaintiff its  
19 reasonable attorneys' fees and expenses in accordance with 35 U.S.C. § 285;  
20 and
- 21 F. Any further relief that this Court deems just and proper.

22  
23 Dated: July 12, 2018

Respectfully submitted,  
**COTMAN IP LAW GROUP, PLC**  
By: /s/ Jayson S. Sohi  
Jayson S. Sohi  
*Attorneys for Plaintiff*  
*Universal Transdata, LLC*