	Case 2:18-cv-07807 Document 1 Filed 09/07/18	Page 1 of 23 Page ID #:1
1	M. ELIZABETH DAY (SBN 177125) eday@feinday.com	
2 3	DAVID ALBERTI (SBN 220265)	
4	CALLIN (CDN 21192()	
5	slim@feinday.com	
6		
7	FEINBERG DAY ALBERTI LIM & BELLOLI LLP	
8	1600 El Camino Real, Suite 280	
9	Menlo Park, CA 94025 Tel: 650.618.4360	
10		
11	Attorneys for Plaintiff	
12	Cellular Transitions, LLC	
13		
14		
15		CALIFORNIA
16	CELLULAR TRANSITIONS, LLC, CA	ASE NO. 2:18-cv-07807
17 18	Plaintiff.	
18 19	V.	OMPLAINT FOR PATENT NFRINGEMENT
20	ASUSTEK COMPUTER INC. and ASUS	NF KIINGEIVIEIN I
20	Defendants.	URY TRIAL DEMANDED
22		
23		
24		
25		
26		
27		
28		
		FOR PATENT INFRINGEMENT

1	Plaintiff Cellular Transitions, LLC ("CellTran"), by and through the
2	undersigned counsel, hereby brings this action and makes the following allegations
3	of patent infringement relating to U.S. Patent Nos. 8,855,637 ("the '637 patent")
4	and 9,888,425 ("the '425 patent") against ASUSTeK Computer, Inc. and ASUS
5	Computer International (collectively, "ASUS"), and alleges as follows upon actual
6	knowledge with respect to itself and its own acts, and upon information and belief
7	as to all other matters:
8	NATURE OF THE ACTION
9	1. This is an action for patent infringement. CellTran alleges that ASUS
10	infringes one or more claims of the '637 patent and the '425 patent, copies of which
11	are attached as Exhibits A-B, respectively (collectively "the Asserted Patents").
12	THE PARTIES
13	2. Plaintiff MPV is a Texas limited liability company with its principal
14	place of business in Plano, Texas.
15	3. Upon information and belief, Defendant ASUSTeK Computer Inc., is
16	a Taiwanese corporation with a place of business at No. 15, Li-Te Road, Beitou
17	District, Taipei 112, Taiwan, R.O.C.
18	4. Upon information and belief, ASUS Computer International is a
19	corporation organized and existing under the laws of California with a place of
20	business at 800 Corporate Way, Fremont, CA 94539, with a registered agent for
21	service of process at CT Corporation System, 818 W 7th St., Suite 930, Los
22	Angeles, CA 90017. In addition to its registered agent, CellTran is informed and
23	believes that ASUS Computer International and/or ASUSTeK Computer Inc. have
24	other regular and established places of business in this District including authorized
25	service centers (http://www.californiacomputer.com/asus-authorized-service-
26	centre).
27	
28	

2

3

4

1

JURISDICTION AND VENUE

5. This action for patent infringement arises under the Patent Laws of the United States, 35 U.S.C. § 1 et. seq. This Court has original jurisdiction under 28 U.S.C. §§ 1331 and 1338.

5 6. This Court has personal jurisdiction over ASUS because ASUS has 6 committed acts within the Central District of California giving rise to this action 7 and has established minimum contacts with this forum such that the exercise of 8 jurisdiction over ASUS would not offend traditional notions of fair play and 9 substantial justice. ASUS, directly and through subsidiaries and intermediaries 10 (including distributors, retailers, franchisees and others), has committed and 11 continues to commit acts of infringement in this District by, among other things, 12 making, using, testing, selling, importing, and/or offering for sale products that 13 infringe the Asserted Patents.

14 7. Venue is proper in this district and division under 28 U.S.C. §§
15 1391(b)-(d) and 1400(b) because ASUS has committed acts of infringement in the
16 Central District of California, ASUSTeK Computer Inc. is a foreign corporation
17 and ASUS Computer International is a California corporation and one or both
18 defendants have one or more regular and established places of business in this
19 District.

20

COUNT 1: INFRINGEMENT OF U.S. PATENT NO. 8,855,637

8. The allegations of paragraphs 1-7 of this Complaint are incorporated
by reference as though fully set forth herein.

23 9. CellTran owns by assignment the entire right, title, and interest in the
24 '637 patent.

10. The '637 patent was issued by the United States Patent and
Trademark Office on October 7, 2014, and is titled "Methods and Apparatus for
Performing Handoff Based on the Mobility of a Subscriber Station." A true and
correct copy of the '637 patent is attached as Exhibit A.

	2	
(COMPLAINT	FOR PATENT INFRINGEMENT

1 11. Upon information and belief, ASUS has infringed at least claim 13 of 2 the '637 patent by making, using, testing, selling, offering for sale, importing 3 and/or licensing in the United States licensed assisted access (LAA) mobile 4 devices, including phones and laptops, including at least the Zenfone 4 Pro, 5 ZenPhone 5Z, and the NovaGo laptop (collectively the "Accused Infringing 6 Devices") in an exemplary manner as described below.

The Accused Infringing Devices are subscriber stations sometimes 12. referred to as user equipment ("UE"), which support LTE-Advanced connectivity 9 and LAA technology. For example, the ZenPhone 4 Pro and the NovaGo laptop 10 use the Snapdragon 835 mobile platform, while the ZenPhone 5Z uses the Snapdragon 845 mobile platform. Both the Snapdragon 835 and the Snapdragon 845 support LAA.

7

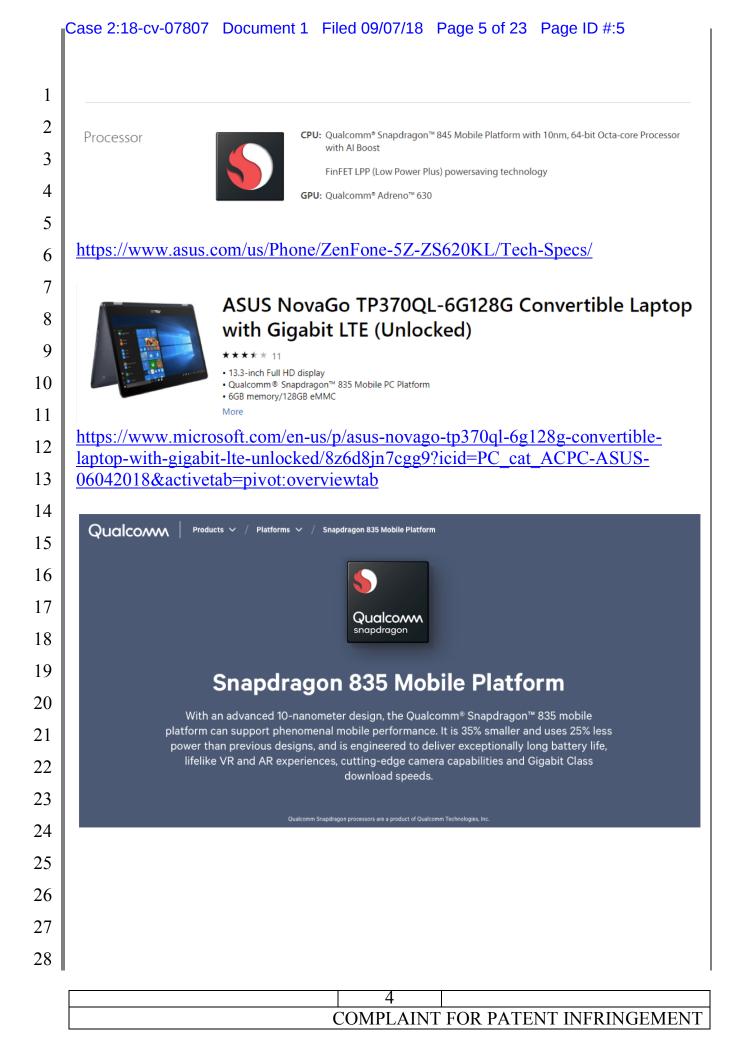
8

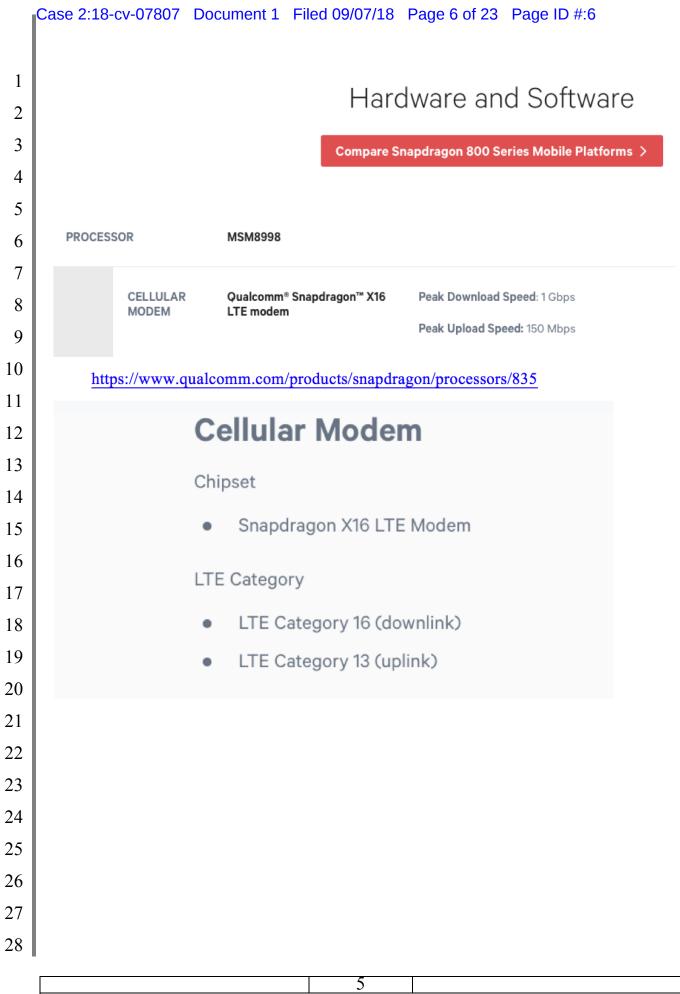
11

12

13		Desidents		O	0	0.5				0
14		Products	What's New	Commercial	Support	Store				LOGIN Q
15	ZenFone 4 I	Pro (ZS55	51KL)			Features 🔨	Tech Specs	Gallery	Support	Where to buy
16			ZenFon	e 4 Pro (ZS	551KL)					
17										
18					•••					
19										
20	_									_
21	Processor				, ,	on™ 835 Mobile Plat Plus) powersaving		nm, 64-bit	Octa-core	Processor
			Qualcomm snapdragon	GPU: Qualcor	nm ® Adreno™ 5	40				
22										
23	https://www	<u>.asus.co</u>	<u>m/us/Pho</u>	ne/ZenFo	ne-4-Pro	<u>o-ZS551K</u>	L/Tech	<u>1-Spec</u>	<u>cs/</u>	
24										
25	/SUS	Products	What's New	Commercial	Support	Store			LO	GIN Q
26	ZenFone 5Z	(ZS620KL)				Features 🔨	Tech Specs	Gallery Su	ipport Wi	here to buy
27			ZenFone 5	δZ						
28										

COMPLAINT FOR PATENT INFRINGEMENT		3	
	(COMPLAINT	FOR PATENT INFRINGEMENT



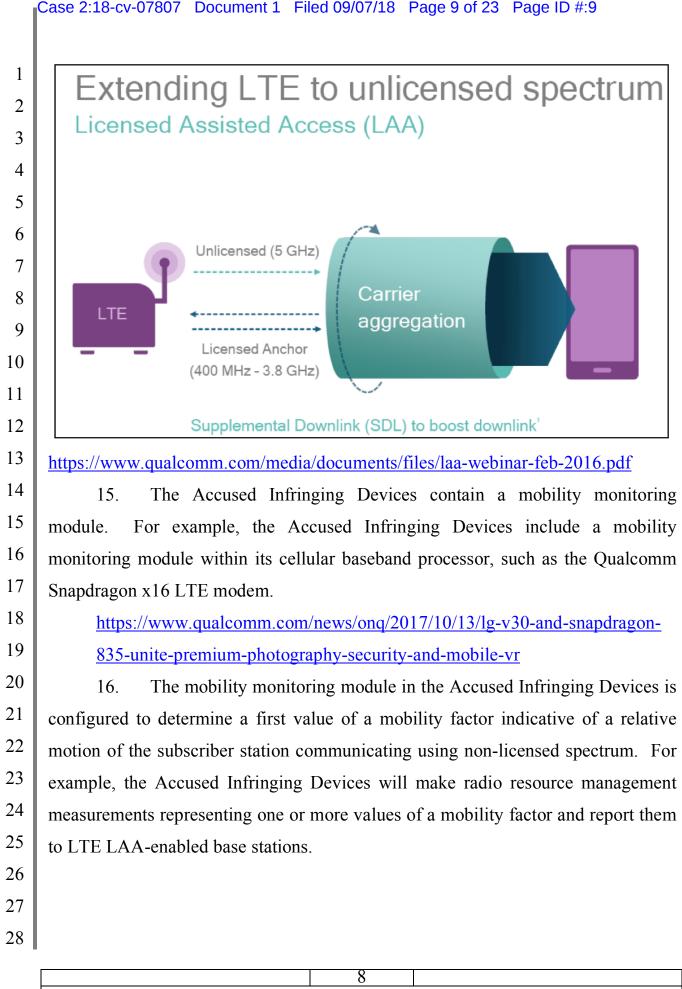


	Case 2:18-cv-07807 Document 1 Filed 09/07/18 Page 7 of 23 Page ID #:7
1	
2	Supported Cellular Technologies
3	LTE FDD
4	LTE TDD
5	• LAA
6	LTE Broadcast
7	
8 9	WCDMA (DB-DC-HSDPA, DC-HSUPA)
9 10	• TD-SCDMA
11	CDMA 1x
12	• EV-DO
13	• GSM/EDGE
14	https://www.qualcomm.com/products/snapdragon/modems/4g-lte/x16
15	
16	
17	SDM845
18	Purpose-built for mobile, the SDM845 is ideal for premium mobile experiences. SDM845
19 20	supports new architectures for AI and immersive virtual reality, as well as gigabit LTE and a new security architecture.
20 21	
22	Cellular Modem
23	Modem Name
24	 Qualcomm[®] Snapdragon[™] X20 LTE modem
25	
26	
27	
28	
	6

	COMPLAINT	FOR PAT	ENT INFRI	NGEMEN
--	-----------	---------	-----------	--------

	Case 2:18-cv-07807 Document 1 Filed 09/07/18 Page 8 of 23 Page ID #:8
1	
1 2	Supported Cellular Technologies
3	LTE FDD
4	LTE TDD
5	• LAA
6	LTE Broadcast
7	 WCDMA (DB-DC-HSDPA, DC-HSUPA)
8 9	 TD-SCDMA
10	 CDMA 1x
11	
12	• EV-DO
13	• GSM/EDGE
14	https://www.qualcomm.com/products/sdm845
15	13. The Accused Infringing Devices contain a front end module configured to establish a service with a base station via a non-licensed spectrum.
16	For example, the Accused Infringing Devices contain front end components that
17	convert information into radio signals that can be transmitted and received over the
18	air.
19 20	RFFE (RF Front-End):
20 21	RF Front End (RFFE) refers to a set of mobile device components that convert
21	information into radio signals that can be transmitted and received over the air. RFFE components work in conjunction with a device's modem and antenna.
22	https://www.qualcomm.com/news/onq/2017/02/23/mwc-2017-fundamentals-cheat-sheet
24	14. Being LAA-enabled UE, the Accused Infringing Devices are
25	configured to establish a service with a base station ("eNB") in a non-licensed
26	(alternatively referred to as "unlicensed") spectrum.
27	
28	

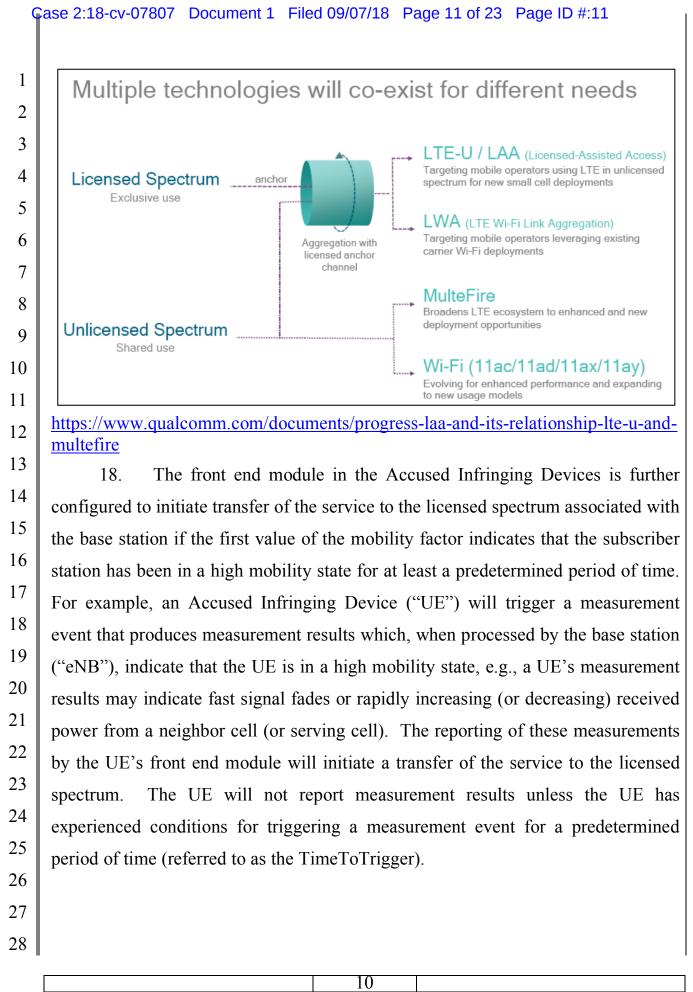
7 COMPLAINT FOR PATENT INFRINGEMENT



COMPLAINT FOR PATENT INFRINGEMENT

Ç	ase 2:18-cv-07807 Document 1 Filed 09/07/18 Page 10 of 23 Page ID #:10
1	5.5 Measurements
2	5.5.1 Introduction
3 4	The UE reports measurement information in accordance with the measurement configuration as provided by E- UTRAN. E-UTRAN provides the measurement configuration applicable for a UE in RRC_CONNECTED by means of dedicated signalling, i.e. using the RRCConnectionReconfiguration or RRCConnectionResume message.
5	The UE can be requested to perform the following types of measurements:
6	 Intra-frequency measurements: measurements at the downlink carrier frequency(ies) of the serving cell(s).
7	 Inter-frequency measurements: measurements at frequencies that differ from any of the downlink carrier frequency(ies) of the serving cell(s).
8	 Inter-RAT measurements of UTRA frequencies.
9	 Inter-RAT measurements of GERAN frequencies.
10	 Inter-RAT measurements of CDMA2000 HRPD or CDMA2000 1xRTT or WLAN frequencies.
-	ETSI TS 136 331 V13.8.1 (2018-01)
11 12	https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 1v130801p.pdf
13	17. The mobility monitoring module in the Accused Infringing Devices is
14	configured to determine availability of the service via a licensed spectrum. For
15	example, the mobility monitoring module within the Qualcomm Snapdragon
16	processors within the Accused Infringing Devices is also configured to
17	communicate with a base station ("eNB") in a licensed spectrum to determine
18	availability of the service.
19	
20	
21	
22	
23	
24	
25	
26	
20	
27	
-	
	9 COMPLAINT FOR PATENT INFRINGEMENT

	9	
(COMPLAINT	FOR PATENT INFRINGEMENT



	COMPLAINT FOR PATENT INFRINGEMEN	Т
--	----------------------------------	---

Gase 2:18-cv-07807 Document 1 Filed 09/07/18 Page 12 of 23 Page ID #:12

 5.5.4.4 Event A3 (Neighbour becomes offset better than PCell/PSCell) The UE shall: > consider the entering condition for this event to be satisfied when condition A3-1, as specified below, is fulfilled; > consider the leaving condition for this event to be satisfied when condition A3-2, as specified below, is fulfilled; > if <i>usePSCell</i> of the corresponding <i>reportCorfig</i> is set to <i>true</i>: > use the PSCell for <i>Mp</i>, <i>Ofp</i> and <i>Ocp</i>; > leate: > use the PCell for <i>Mp</i>, <i>Ofp</i> and <i>Ocp</i>; NOTE The cell(s) that triggers the event is on the frequency indicated in the associated meas/<i>Object</i> which may be different from the frequency used by the PCell' PSCell. Morit the measurement event of the assightoring cell, not thing into account any offset. Mp is the measurement event of the assightoring cell, not thing into account any offset. https://www.ctsi.org/deliver/ctsi_ts/136300_136399/136331/13.08.01_60/ts_13633 IV130801p.pdf - TimeToTrigger The IF <i>TimeToTrigger</i> prefiles the value range used for time to trigger parameter, which concerns the time during which specific citerin for the event hade to be and in order to trigger parameter, which concerns the time during which specific citerin for the event hade to be and in order to trigger parameter, which concerns the time during which specific citerin for the event hade to be and in order to trigger parameter, which concerns the time during which specific citerin for the event hade to be and in order to trigger parameter, which concerns the time during which specific citerin for the event hade to be and in order to trigger and one. 14 TimeToTrigger protection the specific during in the second and corresponds to 40 ms and behaviour as specified in 7.3 applies, mail 0 corresponds to 40 ms, and so corresponds to 40 ms and behaviour as specified in 7.3 applies, mail 0 corresponds to 40 ms, and so corresponds to 40 ms and		
 I - consider the entering condition for this event to be satisfied when condition A3-1, as specified below, is fulfilled; consider the leaving condition for this event to be satisfied when condition A3-2, as specified below, is fulfilled; consider the leaving condition for this event to be satisfied when condition A3-2, as specified below, is fulfilled; if usePSCell of the corresponding reportConfig is set to true: we the PSCell for Mp, Ofp and Ocp; NOTE The cell(c) that tiggers the event is on the frequency indicated in the associated mearObject which may be different from the frequency used by the PCell PSCell. Mr is the measurement result of the neighboring cell, not taking into account any offset. Mg is the measurement result of the PCell PSCell, not taking into account any offset. Mg is the measurement result of the PCell PSCell port taking into account any offset. Mg is the measurement result of the PCell PSCell port taking into account any offset. Mg is the measurement result of the PCell PSCell port taking into account any offset. Mg is the measurement result of the PCell PSCell port taking into account any offset. Mg is the measurement result of the PCell PSCell port taking into account any offset. Mg is the measurement result of the PCell PSCell port taking into account any offset. Mg is the measurement result of the PCell PSCell port taking into account any offset. Mg is the measurement result of the neighboring cell not taking into account any offset. Mg is the measurement result of the result provide taking into account any offset. Mg is the measurement result of the result provide taking into account any offset. TimeToTrigger provide the take account any offset. TimeToTrigger provis account account any offset. TimeToTrigger provi	1	5.5.4.4 Event A3 (Neighbour becomes offset better than PCell/ PSCell)
 > consider the leaving condition for this event to be satisfied when condition A3-2, as specified below, is fulfilled; > if usePSCell of the corresponding reportCorfig is set to true: > use the PSCell for Mp, Ofp and Ocp; NOTE The cell(s) that triggers the event is on the frequency indicated in the associated mearObject which may be different from the frequency used by the FCell PSCell. Mr is the measurement returb of the neighboring cell not taking into account any offset. Mr is the measurement returb of the neighboring cell not taking into account any offset. https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 I 1 - TimeToTrigger The IE TimeToTrigger specifies the value range used for time to trigger parameter, which concerns the time during which specifies times for the event meeds to be meet in order to trigger a measurement report. Value mu0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so on. TimeToTrigger information element - ABRUSTART FINETINETOF ETSI TS 136 331 V13.8.1 (2018-01) at 6.3.5 (p. 437) https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 Iv130801p.pdf 5.5.4 Measurement report triggering 5.5.4 Measurement and the nearAllier within VarMearCorfig: To free ach meatAll included in the meatAllier withe VarM	2	The UE shall:
 Consider the leaving condition for this event to be satisfied when condition A3-2, as specified below, is fulfilled; I> exercises the PSCell of the corresponding reportCorftg is set to true: > use the PSCell for Mp, Qp and Ocp; I> else: > use the PCell for Mp, Qp and Ocp; NOTE The cell(s) that triggers the event is on the frequency indicated in the associated measObject which may be different from the frequency used by the PCell/PSCell. Mr is the measurement result of the neighboring cull, not taking into account any offset. Mp is the measurement result of the PCell/PSCell, not taking into account any offset. Mp is the measurement result of the PCell/PSCell, as taking into account any offset. https://www.etsi.org/deliver/ctsi_ts/136300_136399/136331/13.08.01_60/ts_13633 I v130801p.pdf - TimeToTrigger The IE TimeToTrigger specifies the value range used for time to trigger parameter, which concerns the time during whick specific criteria for the event needs to be met in order to trigger parameter, which concerns the time during mail backviour as specified in 7.3 zeptiles, mail or use, mested, mested, mail on. TIMETOTrigger information element - ABRISTART TimeToTrigger information (for media, mested, mailed, maile	2	1> consider the entering condition for this event to be satisfied when condition A3-1, as specified below, is fulfilled;
 1 If the advection of the contexponding report. Only it is not true: > use the PSCell for Mp, Ofp and Ocp; 1> else: > use the PCell for Mp, Ofp and Ocp; NOTE The cell(c) that trigger: the event is on the frequency indicated in the associated mear Object which may be different from the frequency used by the PCell PSCell. Mn is the measurement result of the neighbouring cell, not taking into account any offict. Mp is the measurement result of the neighbouring cell, not taking into account any offict. Mp is the measurement result of the regulation of the PCell PSCell. Mn is the measurement result of the regulation of the PCell PSCell. More The Coll of the Coll PSCell, not taking into account any offict. https://www.etsi.org/deliver/etsi_ts/136300_1363399/136331/13.08.01_60/ts_136331 V130801p.pdf The IE TimeToTrigger specifies the value range used for time to trigger parameter, which concerns the time during which specific criteria for the event needs to be met in order to trigger a measurement report. Value mu0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, mx40 corresponds to 40 ms, and so on. TimeToTrigger i:= INMOENTED { meta_matbody.ms100, ms180, m		1> consider the leaving condition for this event to be satisfied when condition A3-2, as specified below, is fulfilled;
 I = else: 2 = use the PCell for Mp, Ofp and Ocp; NOTE The cell(s) that triggers the event is on the frequency indicated in the associated mearObject which may be different from the frequency used by the PCell PSCell. More the measurement result of the neighbouring cell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the PCell PSCell, not taking into account my offlets. Mp is the measurement result of the event needs to be met in order to trigger ameasurement report. Value mu0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, me40 corresponds to 40 ms, and so on. <i>TimeToTrigger TimeToTrigger time of the PCell PSCell, me40, m</i>	4	1> if usePSCell of the corresponding reportConfig is set to true:
 b Letter 1 b use the PCell for Mp, Qfp and Ocp; NOTE The cell(s) that triggers the event is on the frequency indicated in the associated mearObject which may be different from the frequency used by the PCell PSCell. Mr is the measurement result of the neighbouring cell, not taking into account any officts. Mp is the measurement result of the PCell PSCell, not taking into account any officts. Mp is the measurement result of the PCell PSCell, not taking into account any officts. Mp is the measurement result of the PCell PSCell, not taking into account any officts. Mp is the measurement result of the PCell PSCell, not taking into account any officts. Mittps://www.etsi.org/deliver/etsi ts/136300_1363399/136331/13.08.01_60/ts_136331 1 v130801p.pdf - TimeToTrigger The IE TimeToTrigger specifies the value range used for time to trigger a measurement report. Value mu0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so cn. H TimeToTrigger information element - ABMIETRET TimeToTrigger ::- EMMERATED { med_me40, me40, ms12, ms240, ms128, ms140, ms254, ms2100, ms121, ms240, ms128, ms140, ms154, ms2100, ms121, ms240, ms154, ms140, ms154, ms2100, ms152, ms240, ms154, ms140, ms165, ms2100, ms152, ms240, ms154, ms160, ms155, ms2100, ms152, ms240, ms155, ms160, ms155, ms2100, ms152, ms240, ms155, ms160, ms155, ms2100, ms155, ms160, ms155, ms160, ms155, ms17	5	2> use the PSCell for Mp, Ofp and Ocp;
NOTE The cell(s) that triggers the event is on the frequency indicated in the associated mearObject which may be different from the frequency used by the FCall PSCell. Mr is the measurement result of the meighbouring cell, not taking into account any offset. Mr is the measurement result of the meighbouring cell, not taking into account any offset. Mr is the measurement result of the FCall PSCell, not taking into account any offset. Mr is the measurement result of the FCall PSCell, not taking into account any offset. Mr is the measurement result of the FCall PSCell, not taking into account any offset. Mr is the measurement result of the FCall PSCell, not taking into account any offset. Mr is the measurement result of the result erange used for time to trigger parameter, which concerns the time during which opecific criteria for the event needs to be met in order to trigger a measurement report. Value mo0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so cn. Mr is the measurement report trigger is the taking transformed on the form of the measurement report. Value mo0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so cn. Mr is the measurement report trigger is the taking transformed on the form of the measurement report. Taking the form the form of the formeasore on more applichable for the correspond	6	l> else:
 NOTE The cell(:) that triggers the event is on the frequency indicated in the associated meas/Object which may be different from the frequency used by the FCell/PSCell. Mr is the measurement result of the neighbouring cell, not taking into account any offset. https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 1v130801p.pdf The IE TimeToTrigger The IE TimeToTrigger specifies the value range used for time to trigger parameter, which concerns the time during which specific criteria for the event needs to be met in order to trigger a measurement report. Value mo0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so on. <i>TimeToTrigger ::= ENUMERATED (</i> medo, medo, medo, mello, mello	7	2> use the PCell for Mp, Ofp and Ocp;
9 Mp is the measurement result of the PCell / PSCell, not taking into account any offset. 10 https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 11 - TimeToTrigger 12 The IE TimeToTrigger specifies the value range used for time to trigger a measurement report. Value mol corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so on. 14 TimeToTrigger information element 15 - ABMISTART 16 ImeToTrigger i::::::::::::::::::::::::::::::::::::		
Mp is the measurement result of the PCell PSCell, not taking und account any offset. 10 https://www.etsi.org/deliver/etsi_ts/136300_136339/136331/13.08.01_60/ts_13633 11 - TimeToTrigger 12 - TimeToTrigger 13 0 14 - TimeToTrigger parameter, which concerns the time during which specific criteria for the event needs to be met in order to trigger a measurement report. Value ms0 corresponds to 0 on. 14 TimeToTrigger information element 15 - ABMISTART 16 TimeToTrigger information element 16 assister 17 assister 18 ETSI TS 136 331 V13.8.1 (2018-01) at 6.3.5 (p. 437) 19 https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 20 5.5.4 21 5.5.4 22 its enable successfully, the UE shall: 23 > for each measurement report triggering 24 2> if the niggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfg within VarMeacConfg; 24 > or more applicable cells for all measurements after layer 3 filtering taken during the ToTrigger defined for this event, within the TarMeacConfg, while the PCentIt does not inc	9	
IV130801p.pdf - TimeToTrigger The IE TimeToTrigger specifies the value range used for time to trigger parameter, which concerns the time during which specific criteria for the event needs to be met in order to trigger a measurement report. Value ms0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so on. ImeToTrigger information element ABRISTART TimeToTrigger ::- ENDMERATED { med0, ms40, ms12, ms40, ms128, ms160, ms128, ms160, ms286, ms280, ms100, ms128, ms140, ms128, ms140, ms1280, ms12		
 <i>TimeToTrigger</i> <i>The IE TimeToTrigger</i> specifies the value range used for time to trigger parameter, which concerns the time during which specific criteria for the sevent needs to be met in order to trigger a measurement report. Value ms0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so on. <i>TimeToTrigger information element</i> - ABRISTART TimeToTrigger ::- BRIMERATED (me0, me80, me81, me80, ms100, ms100, ms100, ms100, ms100, ms256, ms500, ms510, ms510, ms100, ms128, ms160, ms256, ms500, ms100, ms100, ms128, ms160, ms256, ms510, ms510, ms510, ms510, ms100, ms128, ms160, ms256, ms510, ms510, ms510, ms510, ms100, ms128, ms100, ms1280, ms250, ms510, ms510, ms510, ms100, ms100, ms128, ms100, ms256, ms510, ms510, ms510, ms510, ms100, ms10	_	
 The IE TimeToTrigger specifies the value range used for time to trigger parameter, which concerns the time during which specifie criteria for the event needs to be met in order to trigger a measurement report. Value ms0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so on. <i>TimeToTrigger</i> information element -* ABNISTART TimeToTrigger ::- ENUMERATED { ms50, ms512, ms640, ms100, ms128, ms160, ms256, ms5120} ABNISTOF ETSI TS 136 331 V13.8.1 (2018-01) at 6.3.5 (p. 437) https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 1v130801p.pdf 5.5.4.1 General If security has been activated successfully, the UE shall: 1> for each measId included in the measIdList within VarMeasConftg: 2> if the riggerJype is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventI of the corresponding reportConftg within VarMeasConftg; is fulfilled for one or more applicable cells for all measurements after layer 3 filters and manage reportConftg within VarMeasConftg; is fulfilled for one or more applicable cells for all measurements after layer 3 filters after allow during for this event within the VarMeasConftg, which was interologing entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	11	
 which specific citeria for the event needs to be met in order to trigger a measurement report. Value ms0 corresponds to 0 ms and behaviour as specified in 7.3.2 applies, ms40 corresponds to 40 ms, and so on. <i>TimeToTrigger information element</i> AENISTART TimeToTrigger ::- ENUMERATED { ma0, ms64, ms60, ms100, ms128, ms160, ms286, ms1001, ms120, ms2860, ms1001, ms120, ms2860, ms1001, ms120, ms2860, ms1001, ms120, ms2860, ms1001, ms1001,	12	50
 ABNISTART -* ABNISTART TIMETOTTIGGET ::- ENUMERATED (motion, ms40, ms64, ms80, ms100, ms128, ms160, ms156, ms120, ms480, ms512, ms640, ms1280, ms1280, ms1580, ms120) -* ABNISTOF ETSI TS 136 331 V13.8.1 (2018-01) at 6.3.5 (p. 437) https://www.etsi.org/deliver/etsi ts/136300_136399/136331/13.08.01_60/ts_136333 1v130801p.pdf 5.5.4.1 General If security has been activated successfully, the UE shall: 1> for each meazld included in the meazldList within VarMeasConfig: 2> if the miggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during <i>imeToTrigger</i> defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this meazId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	13	which specific criteria for the event needs to be met in order to trigger a measurement report. Value ms0 corresponds to
16 TimeToTrigger ::- ENUMERATED { model, model, model, moleco, mo	14	TimeToTrigger information element
 16 me0, me40, me40, me30, me100, me128, me150, me256, me320, me480, me512, me540, me1280, me2560, me5120) AENISTOF ETSI TS 136 331 V13.8.1 (2018-01) at 6.3.5 (p. 437) 19 https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 10 130801p.pdf 5.5.4 Measurement report triggering 5.5.4.1 General If security has been activated successfully, the UE shall: 1> for each measId included in the measIdList within VarMeasConfig: 2> if the triggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeIoTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	15	ASNISTART
 17 ABRIBTOF ETSI TS 136 331 V13.8.1 (2018-01) at 6.3.5 (p. 437) https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 1v130801p.pdf 5.5.4 Measurement report triggering 21 21 22 25.5.4 Measurement report triggering 23 1> for each measId included in the measIdList within VarMeasConfig: 24 2> if the riggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	16	ms0, ms40, ms64, ms80, ms100, ms128, ms160, ms256,
 ETSI TS 136 331 V13.8.1 (2018-01) at 6.3.5 (p. 437) https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 1v130801p.pdf 5.5.4 Measurement report triggering 5.5.4.1 General If security has been activated successfully, the UE shall: 1> for each measId included in the measIdList within VarMeasConfig: 2> if the triggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	17	
 ETSTTST36531 V13.8.1 (2018-01) at 0.3.5 (p. 457) https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633 1v130801p.pdf 5.5.4 Measurement report triggering 5.5.4 General If security has been activated successfully, the UE shall: 1> for each measId included in the measIdList within VarMeasConfig: 2> if the triggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	18	
 1v130801p.pdf 5.5.4 Measurement report triggering 5.5.4 Measurement report triggering 5.5.4.1 General If security has been activated successfully, the UE shall: 1> for each measId included in the measIdList within VarMeasConfig: 2> if the triggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig; is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 		
 5.5.4 Measurement report triggering 5.5.4 General If security has been activated successfully, the UE shall: 1> for each measId included in the measIdList within VarMeasConfig: 2> if the triggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	19	
 5.5.4.1 General If security has been activated successfully, the UE shall: 1> for each measId included in the measIdList within VarMeasConfig: 2> if the triggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	20	
 If security has been activated successfully, the UE shall: 1> for each measId included in the measIdList within VarMeasConfig: 2> if the triggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	21	
 If security has been activated successfully, the UE shall: 1> for each measId included in the measIdList within VarMeasConfig: 2> if the triggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	22	
 24 2> if the <i>triggerType</i> is set to <i>event</i> and if the entry condition applicable for this event, i.e. the event corresponding with the <i>eventId</i> of the corresponding <i>reportConfig</i> within <i>VarMeasConfig</i>, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during <i>timeToTrigger</i> defined for this event within the <i>VarMeasConfig</i>, while the <i>VarMeasReportList</i> does not include an measurement reporting entry for this <i>measId</i> (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 		If security has been activated successfully, the UE shall:
 corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 		
 or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for this event within the VarMeasConfig, while the VarMeasReportList does not include an measurement reporting entry for this measId (a first cell triggers the event): ETSI TS 136 331 V13.8.1 (2018-01) 	24	
 26 reporting entry for this measId (a first cell triggers the event): 27 ETSI TS 136 331 V13.8.1 (2018-01) 	25	or more applicable cells for all measurements after layer 3 filtering taken during timeToTrigger defined for
	26	
28	27	ETSI TS 136 331 V13.8.1 (2018-01)
" 11	28	
	I	

1 19. ASUS has thus infringed and continues to infringe at least claim 13 of
 2 the '637 patent by making, using, testing, selling, offering for sale, importing
 3 and/or licensing the Accused Infringing Devices.

4 20. ASUS's acts of direct infringement have caused, and continue to
5 cause, damage to CellTran, and CellTran is entitled to recover damages sustained as
6 a result of ASUS's wrongful acts in an amount subject to proof at trial.

7

COUNT 2: INFRINGEMENT OF THE '713 PATENT

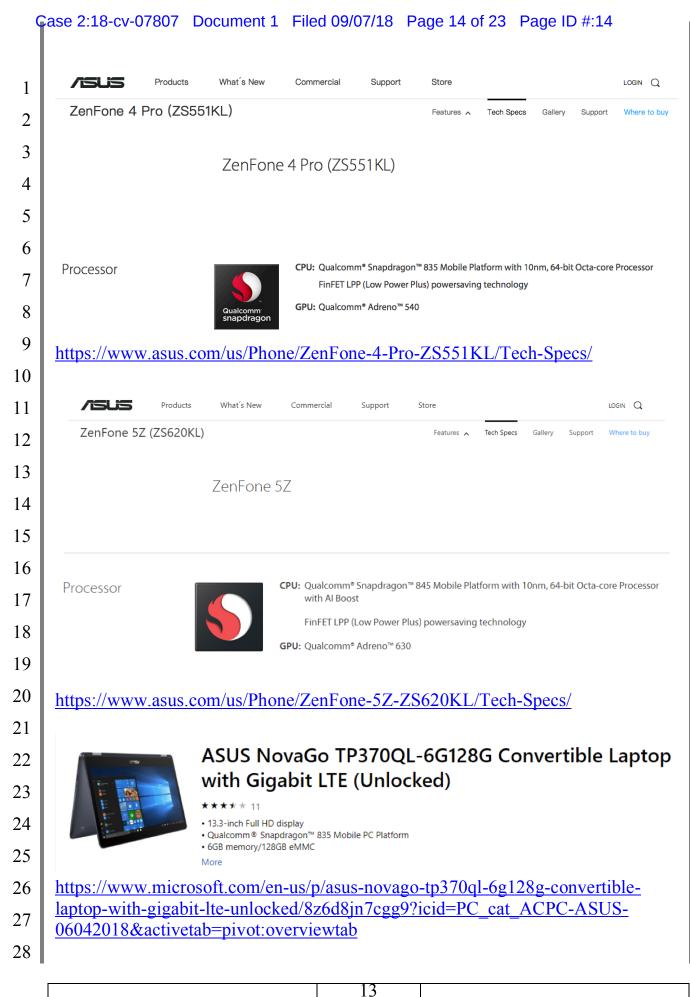
8 21. The allegations of paragraphs 1-7 of this Complaint are incorporated
9 by reference as though fully set forth herein.

10 22. CellTran owns by assignment the entire right, title, and interest in the
11 '425 patent.

12 23. The '425 patent was issued by the United States Patent and Trademark
13 Office on February 6, 2018, and is titled "Methods and Apparatus for Performing
14 Handoff Based on the Mobility of a Subscriber Station." A true and correct copy of
15 the '425 patent is attached as Exhibit B.

- 16 24. Upon information and belief, ASUS has infringed at least claim 7 of
 17 the '425 patent by making, using, testing, selling, offering for sale, importing
 18 and/or licensing in the United States licensed assisted access (LAA) mobile
 19 devices, including phones and laptops, including at least the ZenPro 4, ZenPhone
 20 5Z, and the NovaGo laptop (collectively the "Accused Infringing Devices") in an
 21 exemplary manner as described below.
- 22 25. The Accused Infringing Devices are subscriber stations sometimes
 23 referred to as user equipment ("UE"), which support LTE-Advanced connectivity
 24 and LAA technology. For example, the ZenPhone 4 Pro and the NovaGo laptop
 25 use the Snapdragon 835 mobile platform, while the ZenPhone 5Z uses the
 26 Snapdragon 845 mobile platform. Both the Snapdragon 835 and the Snapdragon
 27 845 support LAA.
- 28

	12	
(COMPLAINT	FOR PATENT INFRINGEMENT



(COMPLAINT	FOR PATENT INFRINGEME	ENT

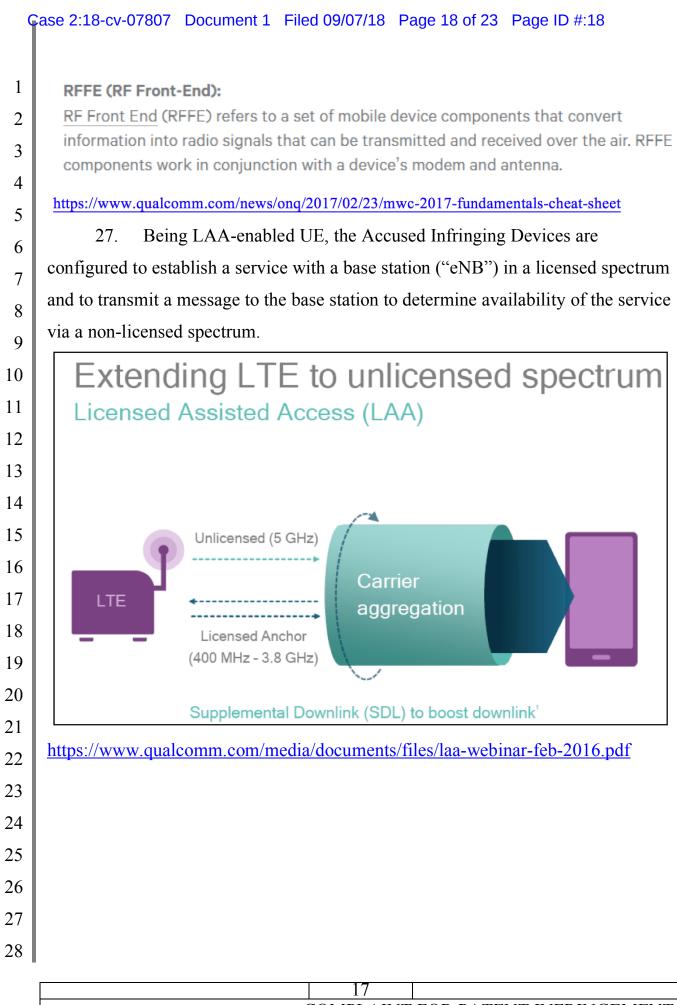


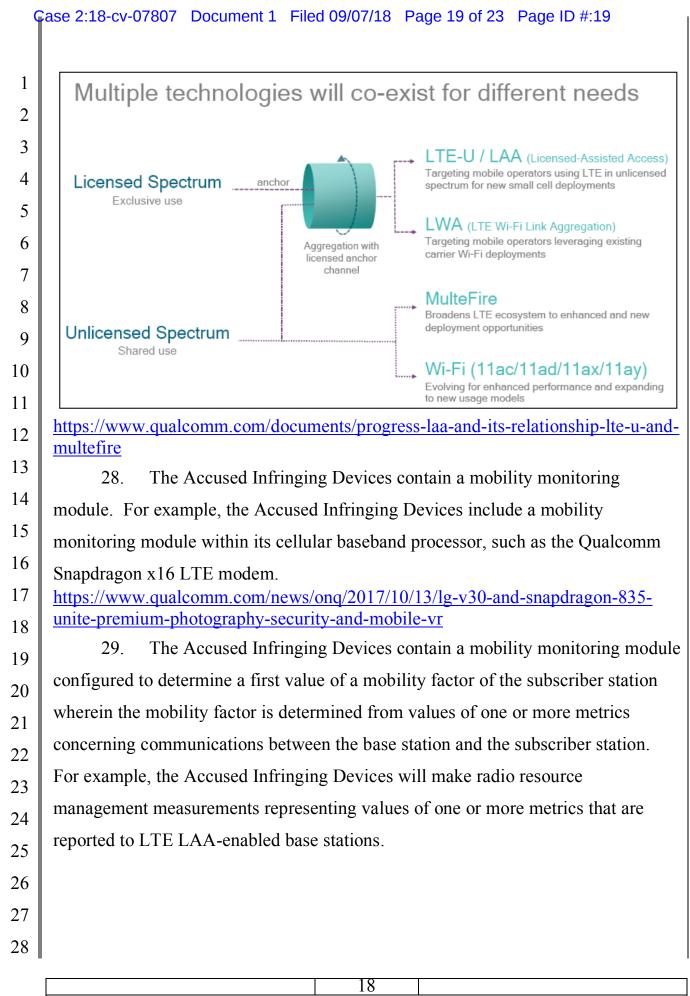
14	
COMPLAINT	FOR PATENT INFRINGEMENT
-	

C	Case 2:18-cv-07807	Document 1 Filed 09/07/18 Page 16 of 23 Page ID #:16
1 2		Cellular Modem
3		Chipset
4		
5		 Snapdragon X16 LTE Modem
6		LTE Category
7		LTE Category 16 (downlink)
8 9		• LTE Category 13 (uplink)
10		
11	0	ported Collular Technologies
12	Sup	ported Cellular Technologies
13	•	LTE FDD
14	•	LTE TDD
15 16	•	LAA
16 17	•	LTE Broadcast
18	•	WCDMA (DB-DC-HSDPA, DC-HSUPA)
19	•	TD-SCDMA
20	•	CDMA 1x
21	•	EV-DO
22	•	GSM/EDGE
23 24	1	
24 25	https://www.qua	lcomm.com/products/snapdragon/modems/4g-lte/x16
25 26		
27		
28		
		15

(ase 2:18-cv-07807 Document 1 Filed 09/07/18 Page 17 of 23 Page ID #:17
1	SDM845
2	Purpose-built for mobile, the SDM845 is ideal for premium mobile experiences. SDM845
3	supports new architectures for AI and immersive virtual reality, as well as gigabit LTE and a new security architecture.
4	
5	Cellular Modem
6 7	Modem Name
/ 8	 Qualcomm[®] Snapdragon[™] X20 LTE modem
9	
10	Supported Cellular Technologies
11	LTE FDD
12	LTE TDD
13	
14	• LAA
15	LTE Broadcast
16	 WCDMA (DB-DC-HSDPA, DC-HSUPA)
17 18	TD-SCDMA
19	CDMA 1x
20	• EV-DO
21	GSM/EDGE
22	https://www.qualcomm.com/products/sdm845
23	26. The Accused Infringing Devices contain a front end module
24	configured to establish a service with a base station in a licensed spectrum and to
25	transmit a message to the base station to determine availability of the service via a
26	non-licensed (alternatively referred to as "unlicensed") spectrum. For example, the
27	Accused Infringing Devices contain front end components that convert information
28	into radio signals that can be transmitted and received over the air.

	16	
(COMPLAINT	FOR PATENT INFRINGEMENT





ç	ase 2:18-cv-07807 Document 1 Filed 09/07/18 Page 20 of 23 Page ID #:20
1	5.5 Measurements
2	5.5.1 Introduction
3	The UE reports measurement information in accordance with the measurement configuration as provided by E- UTRAN. E-UTRAN provides the measurement configuration applicable for a UE in RRC_CONNECTED by means of
4	dedicated signalling, i.e. using the RRCConnectionReconfiguration or RRCConnectionResume message.
5	The UE can be requested to perform the following types of measurements: Intra-frequency measurements: measurements at the downlink carrier frequency(ies) of the serving cell(s).
6	 Intra-frequency measurements: measurements at frequencies that differ from any of the downlink carrier
7	frequency(ies) of the serving cell(s).
8	 Inter-RAT measurements of UTRA frequencies.
9	 Inter-RAT measurements of GERAN frequencies.
10	 Inter-RAT measurements of CDMA2000 HRPD or CDMA2000 1xRTT or WLAN frequencies.
11	ETSI TS 136 331 V13.8.1 (2018-01)
12	https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633
	<u>1v130801p.pdf</u>
13	30. The Accused Infringing Devices use metrics including one or more of
14	frequency offsets, correlations of known signals, and variation of received signal
15	power. For example, the Accused Infringing Devices use metrics such as RSSI,
16	RSPR, and RSRQ, which represent and/or provide one or more frequency offsets,
17	correlations of known signals and variation of signal power.
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
-	19

	17			
CO	OMPLAINT	FOR	PATENT	INFRINGEMENT

Ģ	Case 2:18-cv-07807 Document 1 Filed 09/07/18 Page 21 of 23 Page ID #:21		
1	6.3.6 Other information elements		
2	 UE-EUTRA-Capability 		
3	The IE UE-EUTRA-Capability is used to convey the E-UTRA UE Radio Access Capability Parameters, see TS 36.306 [5], and the Feature Group Indicators for mandatory features (defined in Annexes B.1 and C.1) to the network. The IE		
4	UE-EUTRA-Capability is transferred in E-UTRA or in another RAT.		
5	crossCarrierSchedulingLAA-DL Indicates whether the UE supports cross-carrier scheduling from a licensed carrier for LAA		
6	cell(s) for downlink. This field can be included only if <i>downlinkLAA</i> is included. csi-RS-DRS-RRM-MeasurementsLAA		
7	Indicates whether the UE supports performing RRM measurements on LAA cell(s) based on CSI-RS-based DRS. This field can be included only if <i>downlinkLAA</i> is included.		
8	downlinkLAA		
9	Presence of the field indicates that the UE supports downlink LAA operation including identification of downlink transmissions on LAA cell(s) for full downlink subframes, decoding of		
10	common downlink control signalling on LAA cell(s), CSI feedback for LAA cell(s), RRM measurements on LAA cell(s) based on CRS-based DRS.		
11	rssi-AndChannelOccupancyReporting Indicates whether the UE supports performing measurements and reporting of RSSI and		
12	channel occupancy. This field can be included only if downlinkLAA is included.		
13	3 ETSI TS 136 331 V13.8.1 (2018-01)		
14	⁴ <u>https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_13633</u>		
15	<u>1v130801p.pdf</u>		
16	3GPP T\$ 36.214 version 13.5.0 Release 13 8 ETSI T\$ 136 214 V13.5.0 (2017-10) 3GPP T\$ 36.214 version 13.5.0 Release 13 9 ETSI T\$ 136 214 V13.5.0 (2017-10)		
17	5.1.1 Reference Signal Received Power (RSRP) 5.1.3 Reference Signal Received Quality (RSRQ) Definition Reference Signal Received Quality (RSRQ) is defined as the Intear average over the power		
18	oonthibutions (in [W]) of the resource elements that carry cell-specific reference signals within the considered measurement frequency bandwidth. The seasurements in the cell-specific reference signals R2 according to TS 38.211 [3] shall be used. If the UE can reliably detect that R ₁ is available it may use R ₁ in addition to R ₂ to determine RSRP.		
19	th tail received power (in [WI] observed only in certain OFDM symbols of measure RSRP in the subframes in the configured discovery signals, the UE shall measure RSRP in the subframes in the configured discovery signal coasions. For thame structure 1 and 2, if the UE can reliably detect that cell-specific reference signals are present in other subframes, the UE from all sources, including co-channel serving cells, adjacent channel interference, thermal noise etc. Unless indicated otherwise by higher layers, RSSI is measured only from OFDM symbols		
20	The reference point for the RSRP shall be the antenna connector of the UE containing reference symbols for anterna port 0 of measurement subfames. If higher layers include at 0 FORM symbols for performing RSRD measurements, then RSSI is measured from all OFDM symbols of the UL part of measurement subfames. If higher layers include entain subfames of the individual diversity branches. Applicable for RRC, IDLE intra-frequency, RRC in ULE intra-frequency. RRC IDLE intra-frequency. RRC intra-frequency. RRC intra-frequency. RRC intra-frequency. RRC intra-frequency. RRC interference intra-frequency. RRC intra-frequency. RRC interference intra-frequency. RRC interference interfer		
21	RRC_CONNECTED intra-frequency; If higher layers indicate measurements based on discovery signals, RSS is measured from all OFDM symbols of the DL part of the subframes in the configured discovery signal occasions. NOTE I: The number of resource elements within the considered measurements deguescy bandwidth and within the measurement period that are used by the UE to determine RSRP is left up to the UE implementation with the limitation that corresponding measurement accuracy requirement have to be fulfilled. The reference point for the RSRQ shall be the anterna connector of the UE.		
22	NOTE 2: The power per resource element is determined from the energy received during the useful part of the symbol, excluding the CP. Applicable for RRC_IDLE inter-frequency, RRC_CONNECTED inter-frequency, RRC_CONNECTED inter-frequency,		
23			
24	ETSI TS 136 214 V13.5.0 (2017-10) http://www.etsi.org/deliver/etsi_ts/136200_136299/136214/13.05.00_60/ts_136214		
25	<u>v130500p.</u>		
26	31. The Accused Infringing Devices initiate transfer of the service from		
27	the licensed spectrum to the non-licensed spectrum associated with the base station		
28			

20	
COMPLAINT	FOR PATENT INFRINGEMENT

1	based on the first value of the mobility factor. For example, an Accused Infringing		
2	Device ("UE") can initiate transfer of the service from a licensed to non-licensed		
3	spectrum via a measurement report triggering event. One such exemplary		
4	triggering is Event A3, which specifies that a UE will initiate transfer if RRC		
5	conditions for a neighbor cell (a Secondary Cell ("SCell") on non-licensed		
6	spectrum) become better than those of the Primary Cell ("PCell") (on licensed		
7	spectrum) to which the UE is presently camped.		
8	5.5.4 Measurement report triggering		
9	5.5.4.1 General		
10	If security has been activated successfully, the UE shall:		
11	1> for each measId included in the measIdList within VarMeasConfig:		
12	2> if the triggerType is set to event and if the entry condition applicable for this event, i.e. the event corresponding with the eventId of the corresponding reportConfig within VarMeasConfig, is fulfilled for one		
13	or more applicable cells for all measurements after layer 3 filtering taken during <i>timeToTrigger</i> defined for this event within the <i>VarMeasConfig</i> , while the <i>VarMeasReportList</i> does not include an measurement reporting entry for this <i>measId</i> (a first cell triggers the event):		
14	ETSI TS 136 331 V13.8.1 (2018-01)		
15	32. ASUS has thus infringed and continues to infringe at least claim 7 of		
16	the '425 patent by making, using, testing, selling, offering for sale, importing		
17	and/or licensing the Accused Infringing Devices.		
18	33. ASUS's acts of direct infringement have caused, and continue to		
19	cause, damage to CellTran, and CellTran is entitled to recover damages sustained as		
20	a result of ASUS's wrongful acts in an amount subject to proof at trial.		
21	PRAYER FOR RELIEF		
22	WHEREFORE, CellTran, respectfully prays that the Court enter judgment in		
23	its favor and against ASUS as follows:		
24	A. A judgment that ASUS has infringed the '637 patent;		
25	B. A judgment that ASUS has infringed the '425 patent;		
26	C. A judgment that CellTran be awarded damages adequate to		
27	compensate it for ASUS's past infringement and any continuing or future		
28			

<i>Δ</i> 1		
COMPLAINT	FOR PATENT	INFRINGEMENT

Ģ	ase 2:18-cv-07807 Document 1 Filed 09/07/18 Page 23 of 23 Page ID #:23		
1	infringement of the '637 patent and the '425 patent, including pre-judgment and		
2	post-judgment interest costs and disbursements as justified under 35 U.S.C. § 284		
3	and an accounting;		
4	D. That CellTran be granted its reasonable attorneys' fees in this action;		
5	E. That this Court award CellTran its costs; and		
6	F. That this Court award CellTran such other and further relief as the		
7	Court deems proper.		
8	DEMAND FOR JURY TRIAL		
9	Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, CellTran		
10	demands a trial by jury for all issues so triable.		
11	Dated: September 7, 2018 By /s/ M. Elizabeth Day		
12	M. Elizabeth Day (SBN 177125)		
13	eday@feinday.com FEINBERG DAY ALBERTI LIM &		
14	BELLOLI LLP 1600 El Camino Real, Suite 280		
15	Menlo Park, CA 94025		
16 17	Telephone: 650 618-4360 Facsimile: 650 618-4368		
17 18	1 desimile. 050 010-4500		
18 19	Attorneys for Plaintiff Cellular Transitions, LLC		
20			
20			
22			
23			
24			
25			
26			
27			
28			
	22		

(COMPLAINT	FOR PATENT INFRINGEMENT