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12 *Attorneys for Plaintiff*  
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14  
15 **IN THE UNITED STATES DISTRICT COURT**  
16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

17 **PC COMA LLC,**  
18  
Plaintiff,  
19  
v.  
20 **ACER AMERICA CORPORATION,**  
21  
Defendant.  
22

**CASE NO. 3:19-cv-00986**  
**DEMAND FOR JURY TRIAL**

23 **ORIGINAL COMPLAINT**

24 This is an action for patent infringement in which PC Coma LLC (“Plaintiff”) makes the  
25 following allegations Acer America Corporation (“Defendant”):  
26  
27  
28

**PARTIES**

1  
2 1. PC Coma LLC is a Texas limited liability company with a principle place of business  
3 located at 17330 Preston Rd., Suite 200D, Dallas, TX 75252.

4 2. Upon information and belief, Acer America Corporation is a corporation formed under  
5 the laws of the State of California that has its principal place of business located at 333 W. San Carlos  
6 St., Ste. 1500, San Jose, CA 95110. On information and belief, Defendant may be served via officer or  
7 director at the address above.  
8

9 **JURISDICTION AND VENUE**

10 3. This is an action for infringement of a United States patent arising under 35 U.S.C. §§  
11 271(a), 281, and 284 - 85. This Court has subject matter jurisdiction over this action under 28 U.S.C.  
12 §1331 and §1338(a).

13 4. Venue is proper in this district under 28 U.S.C. § 1400(b). Upon information and belief,  
14 Defendant has a regular and established place of business and has committed acts of patent  
15 infringement in this district.  
16

17 5. Upon information and belief, Defendant is subject to this Court’s specific and general  
18 personal jurisdiction pursuant to due process and/or the California Long Arm Statute, due at least to its  
19 substantial business in this forum, including: (i) at least a portion of the infringements alleged herein;  
20 and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or  
21 deriving substantial revenue from goods and services provided to individuals in California and in this  
22 Judicial District.  
23

24 **INTRADISTRICT ASSIGNMENT**

25 6. Pursuant to Local Rule 3-2(c), this case is subject to district-wide assignment because  
26 it is an Intellectual Property Action.

27 **U.S. PATENT NO. 6,972,950**



1 flow portions which each flow through said thermally conductive section in a direction approximately  
2 parallel to a plane perpendicular to said axis, said flow portions exiting said thermally conductive  
3 section at a plurality of respective locations which are disposed along a substantial portion of the  
4 periphery of said thermally conductive section. *See* Ex. A-1, Figs. 1-10.

5 12. The Accused Instrumentality infringes claim 15 of the '950 Patent. It meets the  
6 limitations of claim 1, and further, wherein said circuitry includes a further component; and including  
7 a heatpipe disposed within said housing, said heatpipe having a first portion which is thermally coupled  
8 to said further component, and having a second portion which is spaced from said first portion and  
9 which is thermally coupled to said thermally conductive section. *See* Ex. A-1, Figs. 1-10.

10 13. The Accused Instrumentality infringes claim 16 of the '950 Patent. It meets the  
11 limitations of claim 1, and further, wherein said fluid supply section includes a fan that effects an air  
12 flow which is said fluid flow. *See* Ex. A-1, Figs. 1-10.

13 14. The Accused Instrumentality infringes claim 17 of the '950 Patent. It meets the  
14 limitations of claim 1, and further, wherein said component contains a processor. *See* Ex. A-1, Figs.  
15 1-10.

16 15. As a result of Defendant's infringement of the '950 Patent, Plaintiff has suffered  
17 monetary damages and is entitled to a money judgment in an amount adequate to compensate for  
18 Defendant's infringement, but in no event less than a reasonable royalty for the use made of the  
19 invention by Defendant, together with interest and costs as fixed by the court.

20 16. Unless a permanent injunction is issued enjoining Defendant and its agents, servants,  
21 employees, representatives, affiliates, and all others acting on in active concert therewith from  
22 infringing the '950 Patent, Plaintiff will be greatly and irreparably harmed.

23 **PRAYER FOR RELIEF**

24 WHEREFORE, Plaintiff respectfully requests that this Court enter:  
25  
26  
27  
28

1 a. Judgment that one or more claims of the '950 Patent have been infringed, either  
2 literally and/or under the doctrine of equivalents, by Defendant;

3 b. Judgment that Defendant account for and pay to Plaintiff all damages and costs  
4 incurred by Plaintiff, caused by Defendant's infringing activities and other conduct complained of  
5 herein;

6 c. That Plaintiff be granted pre-judgment and post-judgment interest on the damages  
7 caused by Defendant's infringing activities and other conduct complained of herein;

8 d. That this Court declare this an exceptional case and award Plaintiff reasonable  
9 attorneys' fees and costs in accordance with 35 U.S.C. § 285; and  
10

11 e. That Plaintiff be granted such other and further relief as the Court may deem just and  
12 proper under the circumstances.

13 DATED February 22, 2019.

Respectfully submitted,

14 By: /s/ Marc Belloli  
15 Marc Belloli

16 **ATTORNEYS FOR PLAINTIFF**  
17 **PC COMA LLC**

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20 **DEMAND FOR JURY TRIAL**

21 Plaintiff demands trial by jury for all issues so triable pursuant to Fed. R. Civ. Pro. 38(b) and  
22 Civil L.R. 3-6(a).

23 DATED February 22, 2019.

Respectfully submitted,

24 By: /s/ Marc Belloli  
25 Marc Belloli

26 **ATTORNEYS FOR PLAINTIFF**  
27 **PC COMA LLC**