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8 Attorneys for Plaintiff
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10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

12 **Rondevoo Technologies, LLC,**

13 Plaintiff,

14 v.

15 **Logitech Inc.,**

16 Defendant.
17

PATENT

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

18
19 Plaintiff Rondevoo Technologies, LLC (“Rondevoo”), through its attorney, Steven
20 Nielsen, complains of Logitech Inc. (“Logitech”), and alleges the following:

21 **PARTIES**

- 22 1. Plaintiff Rondevoo Technologies, LLC is a corporation organized and existing under
23 the laws of California and maintains its principal place of business at 35 Hugus Alley,
24 Suite 210, Pasadena, CA 91103.
25
26 2. Defendant Logitech Inc. is a corporation organized under the laws of California that
27 maintains its principal place of business at 7700 Gateway Blvd., Newark, CA 94560.
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JURISDICTION

- 3. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.
- 4. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).
- 5. This Court has personal jurisdiction over Logitech because it has engaged in systematic and continuous business activities in the Northern District of California. Specifically, Logitech provides a full range of products to residents in this District. As described below, Logitech has committed acts of patent infringement giving rise to this action within this District.

VENUE

- 6. Venue is proper in this District under 28 U.S.C. § 1400(b) because Logitech has committed acts of patent infringement in this District and is incorporated in the state of California. In addition, Rondevoo has suffered harm in this district.

THE PATENT-IN-SUIT

- 7. Rondevoo is the assignee of all right, title and interest in United States Patent No. 6,633,282 (the “’282 Patent,” “Patent-in-Suit”), including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ’282 Patent. Accordingly, Rondevoo possesses the exclusive right and standing to prosecute the present action for infringement of the Patent-in-Suit by Logitech.

The ’282 Patent

- 8. On October 14, 2003, the United States Patent and Trademark Office issued the ’282 Patent. The ’282 Patent is titled “Ballpoint Pen Type Input Device For Computer.” The

1 application leading to the '282 Patent was filed on January 4, 1999. A true and correct
2 copy of the '282 Patent is attached hereto as Exhibit A and incorporated herein by
3 reference.

4 9. The '282 Patent is valid and enforceable.

5 10. The inventors recognized that there was a need for creating a device to transmit
6 handwritten notes directly into a computer. Ex. A, 1:48–62.

7 11. The invention in the '282 Patent provides a wireless pen-type system that allows users
8 to directly write notes into a general computer. *Id.* at 1:65–2:16.

9 12. The '282 Patent claims are not directed to a method of organizing human activity or to
10 a fundamental economic practice long prevalent in commerce. The '282 Patent
11 describes a system that addresses a technical problem—allowing manually scripted or
12 created graphic and alphanumeric data into a computer system manually, *id.* at 1:60-
13 62—with a technical solution: using a wireless pen-type input device that includes
14 sensors and transmitters allowing for an accurate representation of direction and length
15 of each pen stroke. *Id.* at 1:65-2:8.

16 13. The '282 Patent does not preempt the field or preclude the use of other input devices
17 for alphanumeric data. The claims are directed to “[a]n apparatus permitting the
18 entry of manually generated alphanumeric data and graphic data into a computer
19 system . . . [with] opposite ends . . . a writing instrument . . . a writing tip . . . a sensor
20 system . . . and a transmission system.” *Id.* at claim 1. The '282 Patent identifies other
21 input devices for alphanumeric data that lack the features of these claims, such as Palm
22 Pilot systems. *Id.* at 1:48-52.

23 14. The '282 Patent does not take a well-known or established business method or process
24 and apply it to a general-purpose computer. Instead, the specific system described in
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1 the '282 Patent have no direct corollary to a well-known business process. The '282
2 Patent describes a system that addresses a technical problem that arises in the context
3 of inputting data manually. *See id.* at 1:60-62. Technical problems arose because Palm
4 Pilot systems and other devices were limited and did not respond to typical script input.
5 *See id.* at 1:49-52. Using a wireless pen-type input device that includes sensors and
6 transmitters allowing for an accurate representation of direction and length of each pen
7 stroke solved this technical problem. *Id.* at 1:65-2:8.

8
9 **KNOWLEDGE OF INFRINGEMENT**

10 15. Rondevoo informed Logitech by mail on September 19, 2018, that Logitech's IO2
11 Digital Pen ("IO2") infringed at least claim 7 of the '282 Patent. Letter to Defendant,
12 attached hereto as Exhibit B (enclosing the '282 Patent and claim chart as exhibits in
13 this Letter).

14 16. Plaintiff described exactly how Defendant infringed through a preliminary claim chart
15 and infringement analysis.

16 17. Defendant continued to sell the IO2 after knowing they were infringing '282 Patent.

17 18. As of the date of filing, Defendant has continued to sell the IO2 after knowing doing so
18 would infringe the '282 Patent.

19
20 **COUNT I: INFRINGEMENT OF THE '282 PATENT**

21 19. Rondevoo incorporates the above paragraphs herein by reference.

22 20. **Direct Infringement.** Logitech has been and continues to directly infringe at least
23 claim 1 of the '282 Patent in this District and elsewhere in the United States by
24 providing a system, for example, the IO2, that satisfies the preamble of claim 1: "An
25 apparatus, adapted for permitting the entry of manually generated alphanumeric and
26 graphic data into a computer system." For example, Logitech's IO2 allows manually
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1 generated alphanumeric and graphic data to be entered into a computer system. *See*
2 https://www.logitech.com/images/pdf/io2_with_bluetooth_data_sheet.pdf; Figure 1.



11 *Figure 1. Logitech’s IO2 allows manually generated alphanumeric and graphic data to be entered*
12 *into a computer system.*

13 21. The Logitech IO2 satisfies claim element 1(a): “a housing having opposite ends,” and
14 1(b) “a writing instrument contained within the housing and presenting a writing tip at
15 one end of the housing for writing upon a writing surface.” For example, the Logitech
16 IO2 is a wireless pen-type system that includes a housing with opposite ends and a
17 writing instrument within the housing with a writing tip at one end. *See*
18 <https://www.amazon.com/Logitech-IO2-Digital-Pen-965154-0403/dp/B000F4CUKY>;
19 Figures 2-3.
20



25 *Figure 2. The Logitech IO2 is a wireless pen-type system that includes a housing with opposite*
26 *ends and a writing instrument within the housing with a writing tip at one end.*

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Figure 3. The Logitech IO2 has ink cartridges in the writing tip that allows users to write.

22. The Logitech IO2 satisfies claim element 1(c): “a sensor system for detecting the position of the writing tip with respect to a writing surface and for detecting changes in position of the writing tip with respect to the writing surface.” For example, the pad which accompanies the Logitech IO2 detects pen movements as well as pressure sensitivity to accurately record the user’s hand writing. *See* Figure 3.

23. The Logitech IO2 satisfies claim element 1(d): “a transmission system for transmitting the position of the writing tip to the computer system.” For example, the Logitech IO2 connects to a computer via Bluetooth and transfers the recorded writing to create a digitized image. *See*

http://www.logitech.com/images/pdf/io2_with_bluetooth_data_sheet.pdf; Figure 4.

- **Bluetooth**
 - **Bluetooth Passkey Set:**
Custom code can be set. Setting custom code also clears pen stroke memory for added security. Please note the Bluetooth Passkey is not viewable in the Digital Pen software user interface.
 - **Discoverable On/Off:**
Commands the action via pen cap removal.
 - **Streaming mode support**

Figure 4. The Logitech IO2 connects to a computer via Bluetooth and transfers the recorded writing to create a digitized image.

24. **Induced Infringement.** Logitech has also actively induced, and continues to induce, the infringement of at least claim 1 of the ’282 Patent by actively inducing its

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customers, including merchants and end-users to use Logitech’s system in an infringing manner as described above. Upon information and belief, Logitech has specifically intended that its customers use its system in a manner that infringes at least claim 1 of the ’282 Patent by, at a minimum, providing access to support for, training and instructions for, its system to its customers to enable them to infringe at least claim 1 of the ’282 Patent, as described above; Logitech thereby also has actual knowledge that its customers actions as described constitutes infringement of at least claim 1 of the ’282 Patent. Even where elements required to infringe at least claim 1 of the ’282 Patent are accomplished by Logitech and Logitech’s customer jointly, Logitech’s actions have solely caused all of the elements to be performed.

26. Rondevoo is entitled to recover damages adequate to compensate it for such infringement in an amount no less than a reasonable royalty under 35 U.S.C. § 284.

27. Rondevoo will continue to be injured, and thereby caused irreparable harm, unless and until this Court enters an injunction prohibiting further infringement.

JURY DEMAND

28. Under Rule 38(b) of the Federal Rules of Civil Procedure, Rondevoo respectfully requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

29. WHEREFORE, Rondevoo asks this Court to enter judgment against Logitech, granting the following relief:

- A. A declaration that Logitech has infringed the Patent-in-Suit;
- B. An award of damages to compensate Rondevoo for Logitech’s direct infringement of the Patent-in-Suit;

- 1 C. An order that Logitech and its officers, directors, agents, servants, employees,
2 successors, assigns, and all persons in active concert or participation with them, be
3 preliminarily and permanently enjoined from infringing the Patent-in-Suit under 35
4 U.S.C. § 283;
- 5 D. An award of damages, including trebling of all damages, sufficient to remedy
6 Logitech's willful infringement of the Patent-in-Suit under 35 U.S.C. § 284;
- 7 E. A declaration that this case is exceptional, and an award to Rondevoo of reasonable
8 attorneys' fees, expenses and costs under 35 U.S.C. § 285;
- 9 F. An award of prejudgment and post-judgment interest; and
- 10 G. Such other relief as this Court or jury may deem proper and just.
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12 Respectfully submitted,

13 /s/ Steven A. Nielsen

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17 /s/ Isaac P. Rabicoff

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