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13 *Attorneys for Plaintiff*  
**PC Coma LLC**

14  
 15 **IN THE UNITED STATES DISTRICT COURT**  
 16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 17 **OAKLAND DIVISION**

18 **PC COMA LLC,**

19 Plaintiff,

20 v.

21 **LENOVO (UNITED STATES) INC.,**

22 Defendant.  
 23

**Civil Action No. 4:19-cv-991-PJH**

**JURY TRIAL DEMANDED**

**Chief Judge Phyllis J. Hamilton**

24  
 25 **FIRST AMENDED COMPLAINT**

26 This is an action for patent infringement in which PC Coma LLC (“Plaintiff”) makes the  
 27 following allegations against Lenovo (United States) Inc. (“Defendant”):  
 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  
5 2. Upon information and belief, Lenovo (United States) Inc. is a corporation formed under  
6 the laws of the State of Delaware that has its principal place of business located at 1009 Think Place,  
7 Morrisville, North Carolina 27560. On information and belief, Defendant may be served with process  
8 through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange  
9 Street, Wilmington, Delaware 19801.

10  
11 **JURISDICTION AND VENUE**

12 3. This is an action for infringement of a United States patent arising under 35 U.S.C. §§  
13 271(a), 281, and 284 - 85. This Court has subject matter jurisdiction over this action under 28 U.S.C.  
14 §1331 and §1338(a).

15 4. Venue is proper in this district under 28 U.S.C. § 1400(b). Upon information and belief,  
16 Defendant has a regular and established place of business at 602 Charcot Ave San Jose, California  
17 95131 and has committed acts of patent infringement in this district.

18  
19 5. Upon information and belief, Defendant is subject to this Court's specific and general  
20 personal jurisdiction pursuant to due process and/or the California Long Arm Statute, due at least to its  
21 substantial business in this forum, including: (i) at least a portion of the infringements alleged herein;  
22 and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or  
23 deriving substantial revenue from goods and services provided to individuals in California and in this  
24 Judicial District.  
25

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

1  
2           6.       On December 6, 2005, United States Patent No. 6,972,950 (the “’950 Patent”) was  
3 duly and legally issued by the United States Patent and Trademark Office for an invention titled  
4 “Method and Apparatus for Cooling a Portable Computer.” A true and correct copy of the ’950 Patent  
5 is attached hereto as Exhibit A.  
6

7           7.       Plaintiff is the owner of the ’950 Patent with all rights in and to the ’950 Patent.

8           8.       Upon information and belief, to the extent any marking was required by 35 U.S.C.  
9 § 287 with regards to the ’950 Patent, Plaintiff has complied with such requirements.  
10

**COUNT I**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 6,972,950**

11  
12           9.       Defendant directly or through their intermediaries has been and is now infringing claim  
13 1, 8, 15, 16, and 17 of the ’950 Patent in the State of California, in this Judicial District, and elsewhere  
14 in the United States, by, among other things, directly or through intermediaries, making, using,  
15 importing, providing, selling and/or offering for sale products and/or systems (Lenovo Y530 (15”  
16 Gaming Laptop, shown in Exhibit A-1 and Lenovo X1 Carbon (6<sup>th</sup> Gen), shown in Exhibit A-2  
17 (collectively, the “Accused Instrumentalities”)), covered by one or more claims of the ’950 Patent to  
18 the injury of Plaintiff. Defendant is directly infringing, literally infringing, and/or infringing the ’950  
19 Patent under the doctrine of equivalents. Defendant is thus liable for infringement of the ’950 Patent  
20 pursuant to 35 U.S.C. § 271(a).  
21

22  
23           10.      The Accused Instrumentalities infringe claim 1 of the ’950 Patent. They are portable  
24 computers which include: a housing; circuitry disposed within said housing and having a component;  
25 and a temperature adjusting arrangement thermally coupled to said component, said temperature  
26 adjusting arrangement including: a thermally conductive section having a side which faces in a  
27 direction approximately parallel to an axis, and which is thermally coupled to said component; and a  
28

1 fluid supply section disposed on a side of said thermally conductive section opposite from said  
2 component and operable to direct a fluid flow along said axis toward said thermally conductive section,  
3 said thermally conductive section causing said fluid flow to split into a plurality of flow portions which  
4 each flow through said thermally conductive section in a direction approximately parallel to a plane  
5 perpendicular to said axis, said flow portions exiting said thermally conductive section at a plurality of  
6 respective locations which are disposed along a substantial portion of the periphery of said thermally  
7 conductive section. *See* Ex. A-1, Figs. 1-9, Ex. A-2, Figs. 1-13.

9           11. The Accused Instrumentalities infringe claim 8 of the '950 Patent. They the limitations  
10 of claim 1, and further, wherein said housing has first and second ports therethrough, said fluid supply  
11 section being in fluid communication with said first port for drawing into said housing through said  
12 first port from externally of said housing a flow of air, said fluid flow including said flow of air, and  
13 wherein at least part of the air in said flow portions, after leaving said thermally conductive section,  
14 travels to and exits said housing through said second port. *See* Ex. A-1, Figs. 1-11, Ex. A-2, Figs. 1-  
15 15.

17           12. The Lenovo Y530 (15") Gaming Laptop infringes claim 15 of the '950 Patent. It meets  
18 the limitations of claim 1, and further, wherein said circuitry includes a further component; and  
19 including a heatpipe disposed within said housing, said heatpipe having a first portion which is  
20 thermally coupled to said further component, and having a second portion which is spaced from said  
21 first portion and which is thermally coupled to said thermally conductive section. *See* Ex. A-1, Figs.  
22 1-13.

24           13. The Accused Instrumentalities infringe claim 16 of the '950 Patent. They meet the  
25 limitations of claim 1, and further, wherein said fluid supply section includes a fan that effects an air  
26 flow which is said fluid flow. *See* Ex. A-1, Figs. 1-14 Ex. A-2, Figs. 1-16.



**DEMAND FOR JURY TRIAL**

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

DATED May 28, 2019.

Respectfully submitted,

By: /s/ Marc Belloli

**ATTORNEYS FOR PLAINTIFF  
PC COMA LLC**

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