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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 **Bexley Solutions LLC,**
16 **Plaintiff,**
17 **v.**
18 **Edimax Computer Company,**
19 **Defendant,**

Civil Action No. 2:19-cv-4671
COMPLAINT FOR PATENT
INFRINGEMENT
JURY TRIAL DEMANDED

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COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Bexley Solutions LLC (“Bexley”), through its attorneys, complains of Edimax Computer Company (“Edimax”), and alleges the following:

PARTIES

1. Plaintiff Bexley Solutions LLC is a corporation organized and existing under the laws of Texas and maintains its principal place of business at 3509 E Park Blvd Ste 220–2004, Plano, TX 75074-1502.

2. Defendant Edimax Computer Company is a corporation organized and existing under the laws of California that maintains its principal place of business at 3444 De La Cruz Blvd., Santa Clara, CA 95054.

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 Edimax because it has engaged in systematic and continuous business activities in this District. As described below, Edimax 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 Edimax has committed acts of patent infringement in this District, and has an established place of business in this District’s state. In addition, Bexley has suffered harm in this district.

PATENT-IN-SUIT

7. Bexley is the assignee of all right, title and interest in United States Patent Nos. 6,359,879 (the “’879 Patent” or “Patent-in-Suit”), including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times

1 against infringers of the Patent-in-Suit. Accordingly, Bexley possesses the exclusive
2 right and standing to prosecute the present action for infringement of the Patent-in-Suit
3 by Edimax.

4 **The '879 Patent**

5 8. The '879 Patent is entitled "Composite trunking," and issued March 19,
6 2002. The application leading to the '879 Patent was filed on May 6, 1998, ultimately
7 which claims priority from provisional application number 60/082,923, filed on April
8 24, 1998. A true and correct copy of the '879 Patent is attached hereto as Exhibit A
9 and incorporated herein by reference.

10 9. The '879 Patent is valid and enforceable.

11 **COUNT I: INFRINGEMENT OF THE '879 PATENT**

12 10. Bexley incorporates the above paragraphs herein by reference.

13 11. **Direct Infringement.** EDIMAX has been and continues to directly
14 infringe one or more claims of the '879 Patent in at least this District by making, using,
15 offering to sell, selling and/or importing, without limitation, at least Edimax's GS-
16 5008PL ("Exemplary Edimax Products") that infringe at least exemplary claim 4 of the
17 '879 Patent (the "Exemplary '879 Patent Claims") literally or by the doctrine of
18 equivalence. On information and belief, numerous other devices that infringe the
19 claims of the Patent-in-Suit have been made, used, sold, imported, and offered for sale
20 by Edimax and/or its customers.

21 12. Exhibit B includes charts comparing the Exemplary '879 Patent Claims to
22 the Exemplary Edimax Products. As set forth in these charts, the Exemplary Edimax
23 Products practice the technology claimed by the '879 Patent. Accordingly, the
24 Exemplary Edimax Products incorporated in these charts satisfy all elements of the
25 Exemplary '879 Patent Claims.

26 13. Bexley therefore incorporates by reference in its allegations herein the
27 claim charts of Exhibit B.

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1 Dated: May 29, 2019

2 Respectfully submitted,
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