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*Attorneys for Plaintiff  
USB Technologies, LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**USB TECHNOLOGIES, LLC,** )  
 )  
 **Plaintiff,** )  
 )  
 v. )  
 )  
 **SUPER TALENT TECHNOLOGY,** )  
 **CORP.,** )  
 )  
 **Defendant.** )

**Case No.** \_\_\_\_\_

**DEMAND FOR JURY TRIAL**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff USB Technologies, LLC ("USB Technologies" or "Plaintiff"), by and through its undersigned counsel, for its Complaint against Defendant Super Talent

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2 Technology, Corp. (“Defendant” or “Super Talent”) makes the following allegations.  
3 These allegations are made upon information and belief.  
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6 **NATURE OF THE ACTION**

7 1. This is an action under 35 U.S.C. § 271 for infringement of United States  
8 Patent No. 7,809,866 (“the ‘866 Patent”).

9 **PARTIES**

10 2. Plaintiff USB Technologies, LLC is a limited liability company  
11 organized under the laws of the State of California and has an office and principal  
12 place of business at 35 Hugus Alley, Suite 210, Pasadena, CA 91103.

13 3. Defendant Super Talent Technology, Corp. (“Super Talent”) is a  
14 corporation that has its principal place of business located at 2077 N. Capitol Avenue,  
15 San Jose, CA 95132. Super Talent Technology, Corp. may be served by serving its  
16 Registered Agent: Abraham C. Ma, 743 Sostice Ct, Fremont, CA 94539.

17  
18 **JURISDICTION AND VENUE**

19 4. This action arises under the patent laws of the United States, including 35  
20 U.S.C. §§ 271 et seq., 281, and 284.

21 5. This Court has subject matter jurisdiction over this action pursuant to 28  
22 U.S.C. §§ 1331 and 1338(a) because it arises under United States Patent law.

23 6. This Court has personal jurisdiction over the Defendant because, *inter*  
24 *alia*, it resides in the State of California; regularly conducts business in the State of  
25 California; and continues to commit acts of patent infringement in the State of  
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1  
2 California including by making, using, offering to sell, and/or selling Accused  
3 Products within the State of California and this district.

4 7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c)  
5 and 1400(b). Defendant is subject to this Court’s personal jurisdiction because, *inter*  
6 *alia*, Defendants have committed and continue to commit acts of patent infringement  
7 including making, using, offering to sell, and/or selling Accused Products in this  
8 district, and/or importing Accused Products into this district; Defendant has a  
9 principal place of business in this judicial district, and Defendant employs personnel  
10 in this judicial district.

11 **FACTS**

12 8. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,809,866 (“the  
13 ‘866 Patent”), entitled “Multi-Interface Memory Card and Adapter Module for the  
14 Same,” which was duly and legally issued on December 2<sup>nd</sup>, 2003 by the United States  
15 Patent and Trademark Office (“USPTO”).

16 9. A copy of the ‘866 Patent is attached to this Complaint as **Exhibit A**.

17 10. The claims of the ‘866 Patent are valid and enforceable.  
18

19 **COUNT I: CLAIM FOR PATENT INFRINGEMENT**

20 **UNDER 35 U.S.C. § 271(a) (‘866 PATENT)**

21 11. Plaintiff hereby incorporates by reference the allegations of paragraphs 1  
22 through 10 of this Complaint as if fully set forth herein.

23 12. Claim 1 of the ‘866 Patent covers “A double interface flash memory  
24 card, which has a first transmission interface and a circuit board with a microprocessor  
25 and a plurality of flash memory thereon, comprising: a first bus interface circuit  
26 especially for a system interface circuit of the flash memory card being able to  
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2           16. The Accused Product(s) is a memory storage drive that has both USB and  
3 Lightning Connector interfaces. *See* Exhibit B, p. 1.

4           17. The Accused Product(s) includes 32 GB of memory storage space, while  
5 also including both a protruding Lightning Connector and USB Connector, each of  
6 which is accessible from either side of the Flash Drive Housing. *See* Exhibit B, p. 2.

7           18. The Accused Product(s) include a USB Connector as a first interface for  
8 transmitting and receiving data and a memory module. *See* Exhibit B, p. 3.

9           19. The Accused Product(s) includes a printed circuit board having a CPU  
10 connected with the Lightning Connector and USB Connector, via a Lightning  
11 Interface and a USB Interface through circuitry embedded in the PCB. *See* Exhibit B,  
12 p. 4 - 5.

13           20. The Accused Product(s) includes a USB Interface, which allows data  
14 transmission via the USB Connector. *See* Exhibit B, p. 6.

15           21. The Accused Product(s) includes a Lightning Connector as a second  
16 interface coupled to the CPU via a Lightning Interface for communicating with  
17 external devices that are distinct from the memory. *See* Exhibit B, p. 7.

18           22. The Accused Product(s) is able to connect to external Apple® devices  
19 requiring a Lightning Connector in order to access storage space on the memory. *See*  
20 Exhibit B, p. 8.

21           23. The Accused Product(s) includes a CPU module that is electrically  
22 connected to both the USB Connector and the Lightning Connector via the PCB that  
23 allows for the Flash Drive to determine whether the Lightning Connector or USB  
24 Connector should be used for data transmission. *See* Exhibit B, p. 9.

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2  
3 24. The Accused Product(s) include the CPU which allows the Flash Drive to  
4 automatically operate via multiple different working interface modes, such as  
5 Lightning or USB 3.0, depending on the initialization signal received through the  
6 Switching Controller. *See* Exhibit B, p. 10.

7 25. Each one of the elements included in the Infringing System, itemized in  
8 paragraphs 16-24 above, is an element in Claim 1 of the ‘866 Patent.

9 26. Plaintiff has been, and will continue to be, irreparably harmed by  
10 Defendant’s ongoing infringement of the ‘866 Patent.

11 27. As a direct and proximate result of Defendant’s infringement of the ‘866  
12 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be  
13 determined.

14 **PRAYER FOR RELIEF**

15 WHEREFORE, Plaintiff prays for relief against Defendant as follows:

16 A. In favor of Plaintiff that Defendant has infringed one or more claims of  
17 the ‘866 Patent, either literally or under the doctrine of equivalents;

18 B. Requiring Defendant to pay Plaintiff its damages, costs, expenses, and  
19 prejudgment and post-judgment interest for Defendant’s infringement of the ‘866  
20 Patent as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

21 C. For such other and further relief, as may be just and equitable.  
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**DEMAND FOR TRIAL BY JURY**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands a jury trial on all issues and causes of action triable to a jury.

Dated: September 18, 2019

Respectfully submitted,

/s/ Nicholas Ranallo  
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