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SANHO CORPORATION

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

SANHO CORPORATION, a California  
corporation;

Plaintiff,

v.

INTELLIARMOR, a California corporation;  
ADAM ANDERSON, an individual; DOES  
1-10;

Defendants.

Case No.

**COMPLAINT FOR**

**(1) PATENT INFRINGEMENT  
(2) TRADE DRESS INFRINGEMENT  
(3) UNFAIR BUSINESS PRACTICES  
(4) UNJUST ENRICHMENT**

**DEMAND FOR JURY TRIAL**

1 Plaintiff, SANHO CORPORATION (“Plaintiff”), for all causes of action against  
2 defendants INTELLIARMOR, ADAM ANDERSON, and DOES 1-10, alleges as follows:

3  
4 **INTRODUCTION**

5 1. This action arises from the unfair, unlawful, and fraudulent acts and practices of  
6 defendants. Defendants have, to the detriment of the Plaintiff Sanho Corporation (“Plaintiff”), as  
7 set forth below, unlawfully infringed, copied, and trampled upon Plaintiff’s intellectual property  
8 rights and economic advantage by engaging in unfair competition. Defendants’ unlawful and  
9 unfair conduct is comprised of violations of the California Unfair Business Practices Act, the  
10 False Advertising Law, the Patent Act, and the Lanham Act. Defendants’ conduct was willful,  
11 and Plaintiff suffered harm. Accordingly, Plaintiff prays for monetary and injunctive relief, as set  
12 forth herein.

13 **JURISDICTION**

14 2. This is a civil action seeking damages and injunctive relief for, *inter alia*, patent  
15 infringement under the Patent Act, 35 U.S.C. § 101, *et seq.*

16 3. This Court has subject matter jurisdiction over Plaintiff’s claims pursuant to 28  
17 U.S.C. §§ 1331, and 1338.

18 4. This Court has personal jurisdiction over the Defendants because, among other  
19 things, defendants are doing business in the State of California and in this judicial district, the acts  
20 of infringement complained of herein occurred in the State of California and in this judicial  
21 district, and/or defendants have caused injury to Plaintiff and its goodwill, and intellectual  
22 property within the State of California and in this judicial district.

23 **INTRADISTRICT ASSIGNMENT**

24 5. Pursuant to Civil L.R. 3-2(c), this case should be subject to district-wide  
25 assignment because it is an Intellectual Property Rights action.  
26  
27  
28

**VENUE**

6. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400.

**THE PARTIES**

7. Plaintiff is a California corporation with its principal place of business in Fremont, CA and does business in California and in the United States.

8. Defendant intelliARMOR, aka intelliARMOR Inc. is a California corporation.

9. Defendant Adam Anderson is an individual residing in California.

10. Plaintiff does not know the true names and capacity of defendants sued herein as DOES 1-10, and therefore sues these defendants by such fictitious names. Plaintiff is informed and believes, and on the basis of that information and belief alleges, that each of the defendants was in some manner legally responsible for the events and happenings alleged in this complaint and for Plaintiff's damages. Plaintiff will amend this complaint to allege their true names and capacities when ascertained.

**GENERAL AVERMENTS**

11. Plaintiff Sanho Corporation is a technology company based in Fremont, CA.

12. Plaintiff, on or around December 5, 2016, released the "HyperDrive" product, a USB-C hub with 2 USB-C connectors. Plaintiff's product was widely reported in the media and Plaintiff went on to raise over \$3.1M on both Kickstarter and Indigogo.

13. Plaintiff is the assignee of United States Patent No. US D855,616 (the "616 Patent"). Plaintiff owns all right, title and interest in the '616 Patent. A true and correct copy of the '616 Patent is attached to the complaint as **Exhibit A**.

14. Plaintiff is the assignee of United States Patent No. US D813,875 S (the "875 Patent"). Plaintiff owns all right, title and interest in the '875 Patent. A true and correct copy of the '875 Patent is attached to the complaint as **Exhibit B**.

15. As set forth herein, in and around 2019, it came to Plaintiff's attention that Defendant and/or its agents had advertised, sold, and offered for sale products embodying the

1 '616 Patent and the '875 Patent. Defendants also infringed on Plaintiff's trademark rights and  
2 trade dress.

3 16. Notably, Defendant does not have any license, authorization, permission or  
4 consent to use Plaintiff's intellectual property.

5 17. On or around October 2019, Plaintiff sent written notice to Defendants regarding  
6 Defendants' infringement and demanded that Defendants immediately cease and desist.  
7 Defendants refused to cease and desist and has continued its unfair and unlawful scheme. As a  
8 result of Defendants' unfair scheme, Plaintiff has suffered and will suffer damages. Plaintiff is  
9 entitled to injunctive relief and redress for Defendants' willful, intentional and purposeful use and  
10 exploitation of Plaintiff's intellectual property with full knowledge that such use constituted  
11 infringement of, and was in disregard of, Plaintiff's rights, also constituting unfair business  
12 practices.

13 **COUNT I**

14 **(Patent Infringement)**

15 **(35 U.S.C. § 271)**

16 18. Plaintiff re-alleges and incorporates by reference all paragraphs of this Complaint.

17 19. Defendants have and continue to infringe the '616 Patent and the '875 Patent by  
18 using, selling, and offering for sale products embodying or substantially similar to the drawings  
19 of the patents-in-suit, including the "INTELLIARMOR – LYNKHUB HD + 7 IN 1 USB C  
20 HUB" and the "INTELLIARMOR – LYNKHUB PRO 3 IN 1 USB C HUB" products sold by  
21 Defendants.

22 20. Plaintiff has suffered damages as the result of Defendants' infringement of the  
23 '616 Patent and the '875 Patent.

24 21. Defendants' infringement is willful, as Plaintiff has demanded that Defendants  
25 cease from infringement and the unfair business practices, but Defendants, and their affiliates and  
26 agents continue to advertise, sell, and/or offer for sale, the infringing products.

**(15 U.S.C. 1125(a))**

24. Plaintiff has rights to the trade dress of its marketing and goods, including with respect to the HYPERDRIVE (“Trade Dress”).

26. Plaintiff's Trade Dress is distinctive of Plaintiff.

28. Plaintiff's Trade Dress has acquired distinctiveness, also known as secondary meaning.

1 industry, and Defendants' plagiarism which trades off Plaintiff's Trade Dress and the goodwill  
2 and success associated therewith.

3 30. Plaintiff's Trade Dress has become associated with Plaintiff.

4 31. Defendants' use of the Trade Dress is a deliberate and willful effort to deceive,  
5 mislead, and confuse consumers to enable Defendants to trade-off of Plaintiff's reputation and  
6 goodwill in the HYPERDRIVE.

7 32. Defendant's acts constitute unfair competition in violation of, *inter alia*, Section  
8 43(a) of the Lanham Act.

9 33. By reason of Defendants' conduct, Plaintiff has suffered and will continue to  
10 suffer damage to their business, reputation and goodwill.

11 34. By reason of Defendants' conduct, Defendants have caused and, unless enjoined  
12 by the Court, will continue to cause immediate and irreparable harm to Plaintiff for which there is  
13 no adequate remedy at law.

14 35. Plaintiff is entitled to a preliminary injunction to be made permanent upon entry of  
15 final judgment, preventing Defendants' conduct.

16  
17 **COUNT III**

18 **(Violation of California Unfair Business Practices Act)**

19 **(Cal. Bus. & Prof. Code Section 17200)**

20 36. Plaintiff herein re-alleges and incorporates by reference each and every allegation  
21 contained in the instant pleading.

22 37. Defendants unlawfully, unfairly, and fraudulently infringed on Plaintiff's  
23 intellectual property rights.

24 38. Defendant's conduct was a deliberate attempt to copy and create confusion with  
25 Plaintiff's product and unfairly divert Plaintiff's business to Defendants.

44. Pursuant to California Business and Professions Code § 17203, Plaintiff seek an order enjoining Defendants from engaging in further unlawful, unfair, and/or fraudulent business acts, and restitution of money and/or property Plaintiff has lost on account of such acts.

## UNJUST ENRICHMENT

48. Accordingly, Plaintiff seeks an order establishing Defendant(s), and any agents or sellers of Defendant as constructive trustees of the profits received by collecting the unfair

1 amounts that served to unjustly enrich them, together with interest during the period in which  
2 defendants have retained such funds, and requiring Defendants to disgorge those funds to Plaintiff  
3 in a manner to be determined by the Court.

4 49. Therefore, Plaintiff prays for relief as set forth below.

5  
6 **JURY TRIAL DEMAND**

7 Plaintiff hereby demands a trial by jury.

8  
9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff prays that the Court enter judgment in its favor and against  
11 Defendants as follows:

12 1. That judgment be entered in favor of Plaintiff against Defendants;  
13 2. That Defendants be declared to have infringed, induced others to infringe, and/or  
14 committed acts of contributory infringement, with respect to the claims of the subject U.S.  
15 Patents;

16 3. That Defendants, their officers, agents, servants, employees, attorneys, parents,  
17 subsidiaries, affiliates, successors, and all others in active concert or participation with them or  
18 acting on their behalf be permanently enjoined from further infringement of the subject U.S.  
19 Patents;

20 4. That Defendants, their officers, agents, servants, employees, attorneys, parents,  
21 subsidiaries, affiliates, successors, and all others in active concern or participation with them or  
22 acting on their behalf be preliminarily and permanently enjoined from engaging in any trade  
23 practices whatsoever, including those complained of herein, which tend to unfair compete with or  
24 injure Plaintiff's business and the goodwill associated therewith;

25 5. That, pursuant to 15 U.S.C. § 1117, Defendants be held liable for all damages  
26 suffered by Plaintiff resulting from the acts alleged herein;  
27  
28



1           6.       That, pursuant to 15 U.S.C. § 1117, Defendants be compelled to account to  
2 Plaintiff for any and all profits derived by it from its illegal acts complained of herein;

3           7.       That this matter be declared an “exceptional case” pursuant to 15 U.S.C. § 1117,  
4 and that said Defendants be ordered to pay Plaintiff’s attorney fees and costs;

5           8.       That Plaintiff be awarded compensatory, lost profits, and special damages for the  
6 infringement in an amount to be determined at trial; the extent of Defendants’ total profit and  
7 revenue realized and derived from its infringement, and actual damages to Plaintiff in an amount  
8 not less than a reasonable royalty for Defendants’ infringement and/or as provided pursuant to 35  
9 U.S.C. § 289;

10          9.       Treble damages pursuant to 35 U.S.C. § 284 for Defendants’ willful and deliberate  
11 infringement, and as permitted under other applicable laws;

12          10.      An award of costs together with Plaintiff’s reasonable attorney’s fees pursuant to  
13 35 U.S.C. § 285 for this case being exceptional, and as permitted under other applicable laws;

14          11.      For restitution;

15          12.      That the Court otherwise award Plaintiff enhanced damages and attorneys’ fees;

16          13.      That Plaintiff be awarded pre-judgment interest;

17          14.      For any statutory damages or penalties;

18          15.      For an accounting of, and the imposition of a constructive trust with respect to,  
19 Defendants’ profits attributable to their infringements of intellectual property; and

20          16.      For such other and further relief as the Court may deem just and proper.

21       WHEREFORE, a demand for jury trial is made.

22       //

23       //

24       //

25       //

26       //

27       //

Respectfully submitted,

Dated: November 6, 2019

By: /s/ Ali A. Aalaei

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# **Exhibit A**

US00D855616S

(12) **United States Design Patent**  
**Chin**(10) **Patent No.:** **US D855,616 S**(45) **Date of Patent:** **\*\* \*Aug. 6, 2019**(54) **THUNDERBOLT 3.0 USB-C CONNECTOR**(71) Applicant: **Kien Hoe Daniel Chin**, Fremont, CA  
(US)(72) Inventor: **Kien Hoe Daniel Chin**, Fremont, CA  
(US)

(\*) Notice: This patent is subject to a terminal disclaimer.

(\*\*) Term: **15 Years**(21) Appl. No.: **29/585,509**(22) Filed: **Nov. 24, 2016**(51) **LOC (12) Cl.** ..... **14-02**(52) **U.S. Cl.**  
USPC ..... **D14/433**(58) **Field of Classification Search**

USPC ..... D14/432, 433, 358

CPC ..... H01M 10/44

See application file for complete search history.

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*Primary Examiner* — Cynthia R Underwood(74) *Attorney, Agent, or Firm* — Alexander Chen, Esq.;  
Agnew International Patent & Trademark Law Firm(57) **CLAIM**

The ornamental design for thunderbolt 3.0 USB-C connector, as shown and described.

**DESCRIPTION**

FIG. 1 is a perspective view of a thunderbolt 3.0 USB-C connector;

FIG. 2 is a front view thereof;

FIG. 3 is a side view thereof;

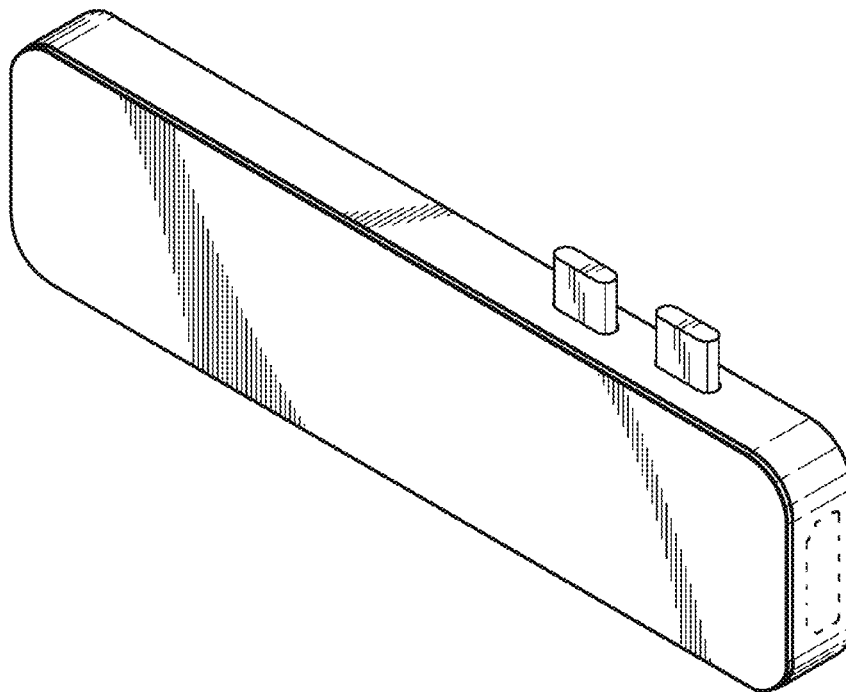
FIG. 4 is a back side view thereof;

FIG. 5 is a side view thereof;

FIG. 6 is a side view thereof; and,

FIG. 7 is a side view thereof.

The broken lines are included to show environmental structure and form no part of the claimed design.

**1 Claim, 3 Drawing Sheets**

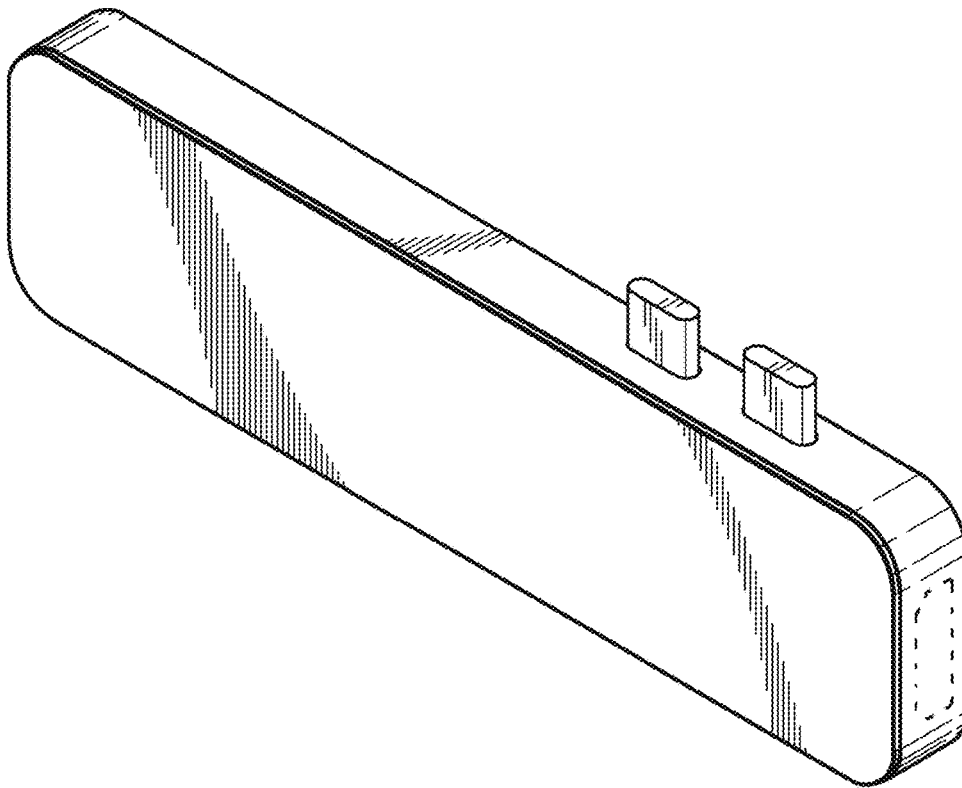
**U.S. Patent**

**Aug. 6, 2019**

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***FIG. 1***



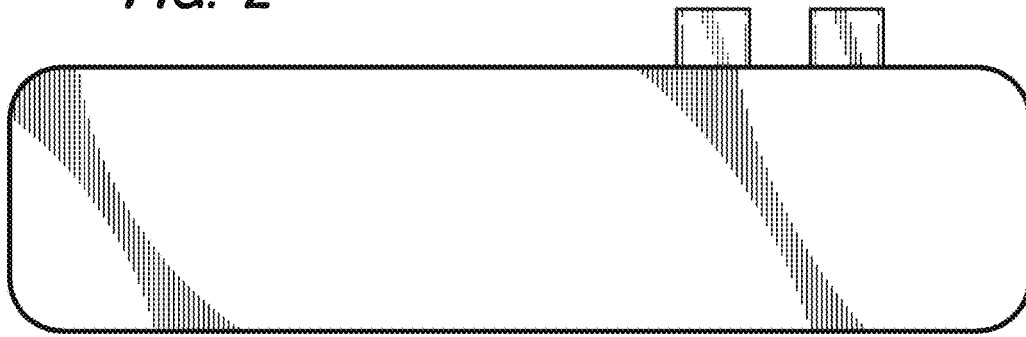
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**Aug. 6, 2019**

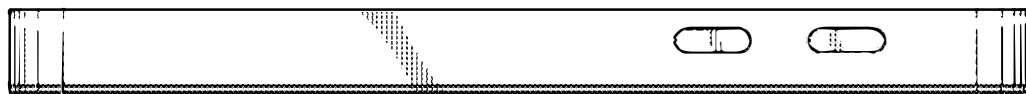
**Sheet 2 of 3**

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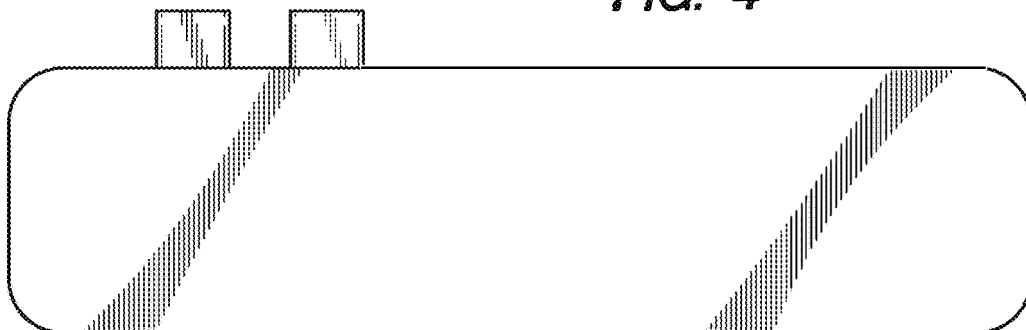
***FIG. 2***



***FIG. 3***



***FIG. 4***



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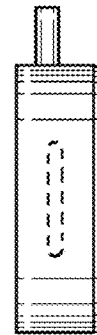
***FIG. 5***



***FIG. 6***



***FIG. 7***



# **Exhibit B**





US00D813875S

(12) **United States Design Patent**  
**Liao**

(10) **Patent No.:** **US D813,875 S**

(45) **Date of Patent:** **\*\* Mar. 27, 2018**

(54) **MULTI-FUNCTION DOCKING STATION**

(71) Applicant: **Zhuowen Liao**, Shenzhen (CN)

(72) Inventor: **Zhuowen Liao**, Shenzhen (CN)

(73) Assignee: **GOPOD GROUP LTD.** (CN)

(\*\*) Term: **15 Years**

(21) Appl. No.: **29/590,634**

(22) Filed: **Jan. 12, 2017**

(30) **Foreign Application Priority Data**

Dec. 13, 2016 (CN) ..... 2016 3 0613236

(51) **LOC (11) Cl.** ..... **14-02**

(52) **U.S. Cl.**  
USPC ..... **D14/434**; D14/357; D13/133

(58) **Field of Classification Search**

USPC ..... D14/434, 440, 447, 251-253, 432, 451,  
D14/452, 454, 140, 142, 149, 217, 240,  
D14/299, 496, 356, 358, 171, 357, 433;  
D13/103, 107, 108, 118, 119, 184, 110,  
D13/123, 133, 134, 182  
CPC .... G06F 1/1632; G06F 1/1635; G06F 1/1637;  
G06F 13/00; G06F 13/387; G06F 3/05;  
H01M 10/44; F16M 11/00; H02J 7/0042;  
H02J 7/00; H02J 7/0027; H02J 7/0044;  
H02J 7/0045; H02J 7/355; H01R 31/065;  
H03M 1/00

See application file for complete search history.

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*Primary Examiner* — Susan Bennett Hattan

*Assistant Examiner* — Marie D. Fast Horse

(74) *Attorney, Agent, or Firm* — Roger H. Chu

(57)

**CLAIM**

The ornamental design for a multi-function docking station,  
as shown and described.

**DESCRIPTION**

FIG. 1 is a top view of a multi-function docking station  
showing my design;

FIG. 2 is a rear view thereof;

FIG. 3 is a bottom view thereof;

FIG. 4 is a front view thereof;

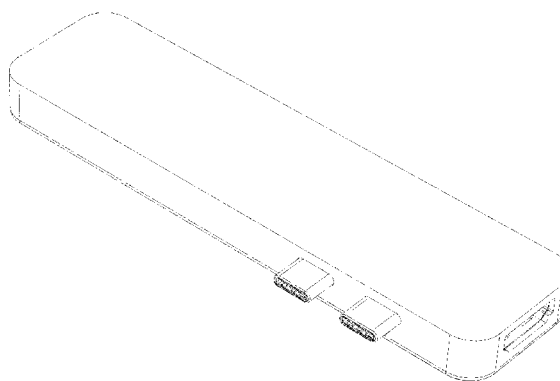
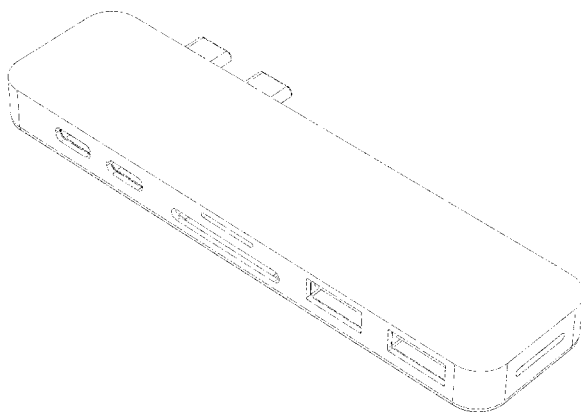
FIG. 5 is a right side view thereof;

FIG. 6 is a left side view thereof;

FIG. 7 is a top, front, left side perspective view thereof; and,

FIG. 8 is a top, rear, right side perspective view thereof.

**1 Claim, 8 Drawing Sheets**



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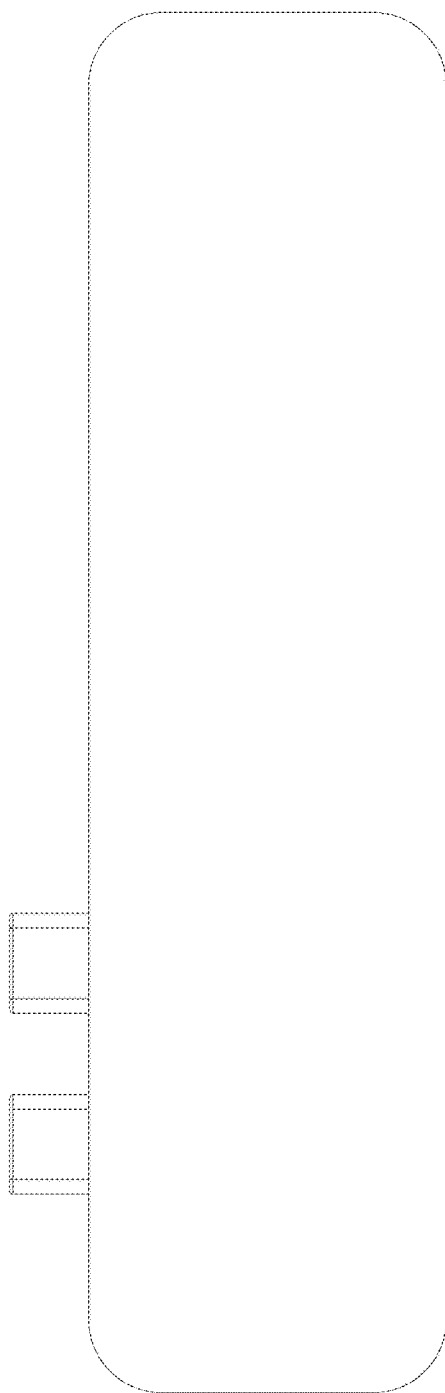
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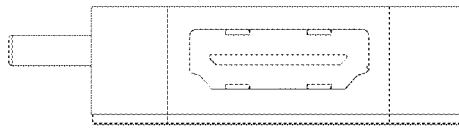
**FIG. 1**

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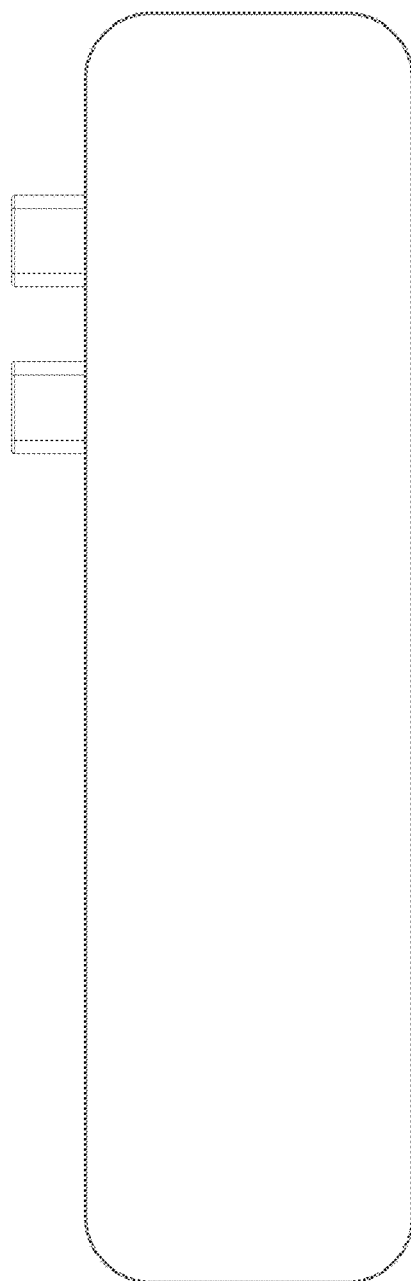
**FIG. 2**

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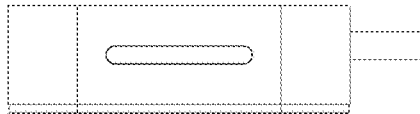
**FIG. 3**

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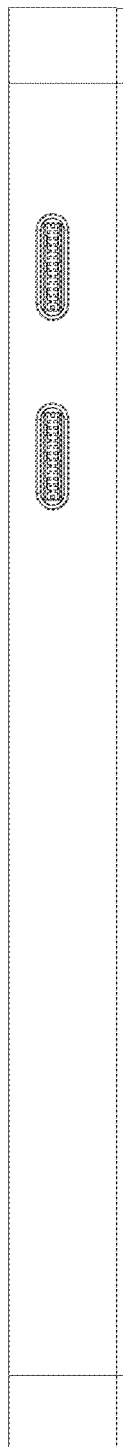
**FIG. 4**

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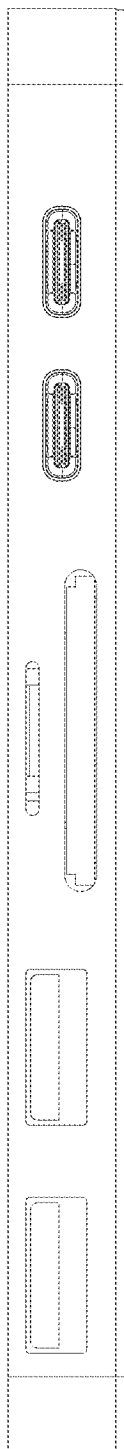
**FIG. 5**

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**FIG. 6**

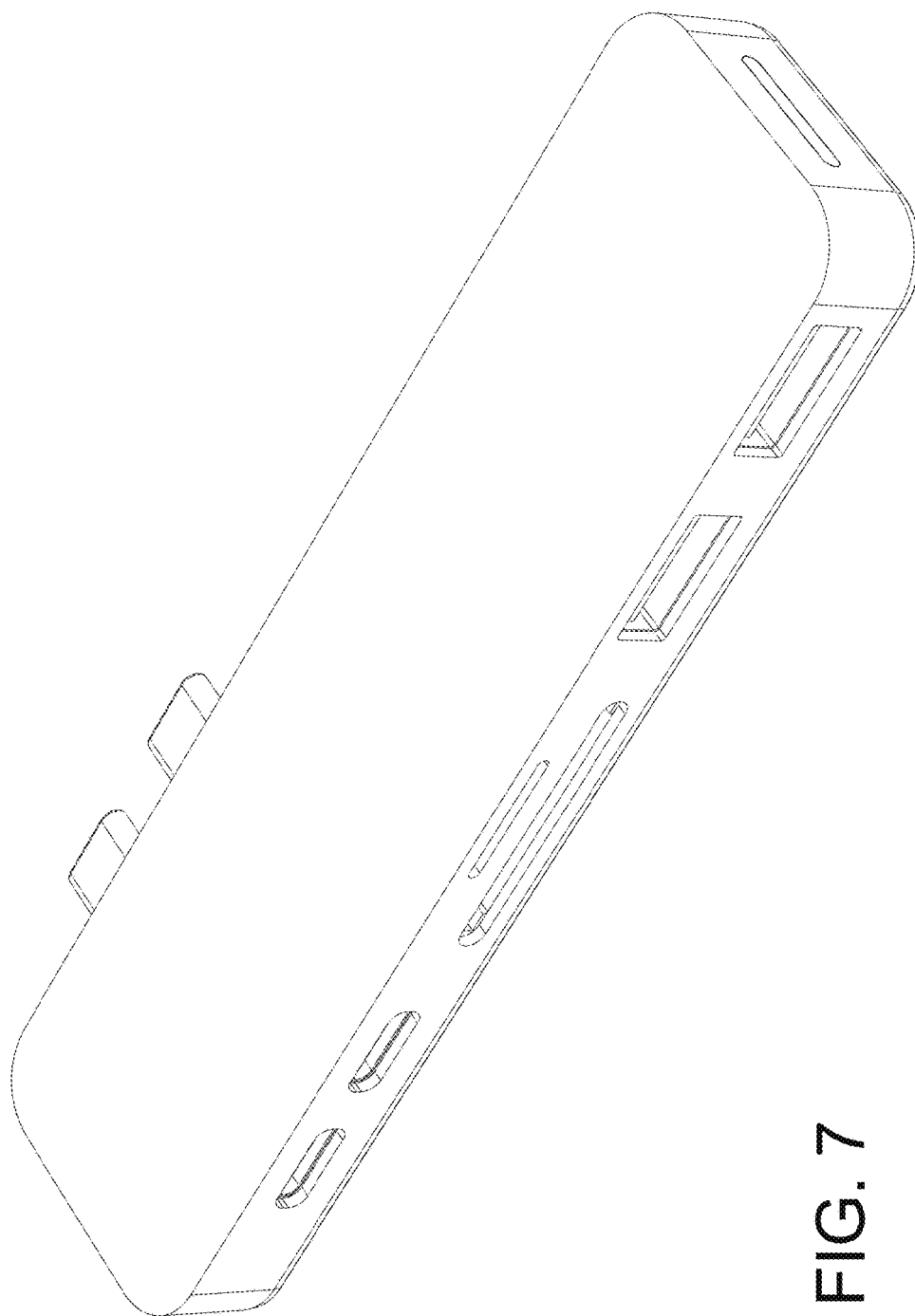


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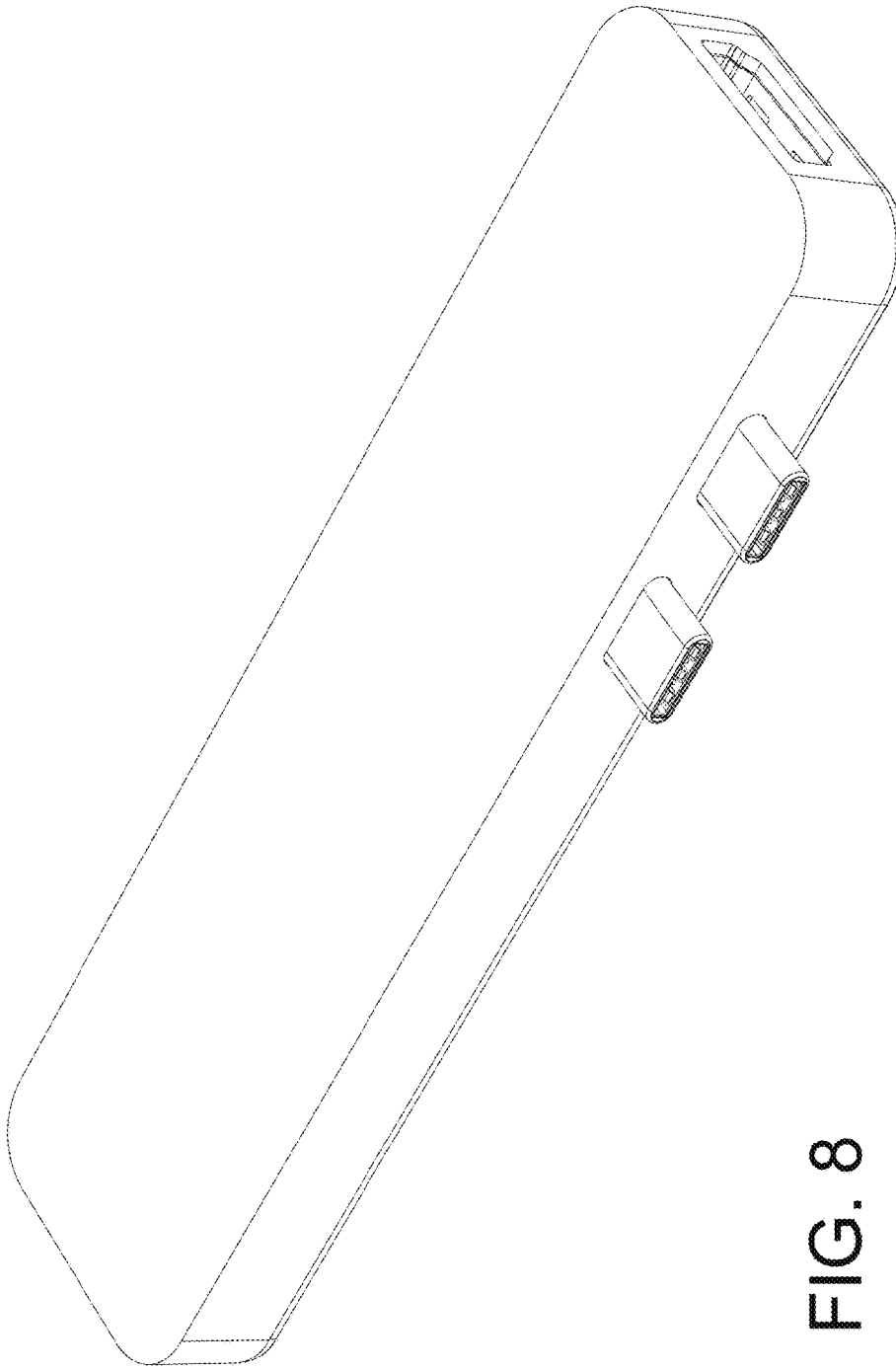
**FIG. 7**

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**FIG. 8**