

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

<p>USB TECHNOLOGIES, LLC, a California limited liability company,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>DEXXXON DIGITAL STORAGE, INC. Delaware corporation,</p> <p style="text-align: center;">Defendant.</p>	<p>Civil Action No. _____</p> <p style="text-align: center;"><b>JURY TRIAL DEMANDED</b></p>
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**COMPLAINT FOR PATENT INFRINGEMENT**

USB Technologies, LLC (“Plaintiff”) brings this complaint against Dexxxon Digital Storage, Inc. (“Defendant” or “Dexxxon”). As its complaint against Defendant, Plaintiff alleges as follows:

**NATURE OF THE ACTION**

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

**THE PARTIES**

2. Plaintiff USB Technologies, LLC, is a California limited liability company having a principal place of business at 35 Hugus Alley, STE 210, Pasadena, CA 91103.

3. Defendant Dexxxon Digital Storage, Inc. is a Delaware corporation having a principal place of business at 7611 Green Meadows Drive, Lewis Center, Ohio 43035. Dexxxon may be served via its Registered Agent, Dave Burke at 7611 Green Meadows Drive, Lewis Center, Ohio 43035.

**JURISDICTION AND VENUE**

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

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

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

**FACTS**

7. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,809,866 (“the ‘866 Patent”), entitled “Double Interface SD Flash Memory Card,” which was duly and legally issued on October 5<sup>th</sup>, 2010 by the United States Patent and Trademark Office (“USPTO”).

8. A copy of the ‘866 Patent is attached to this Complaint as Exhibit A.

9. The claims of the ‘866 Patent are valid and enforceable.

**COUNT I: CLAIM FOR PATENT INFRINGEMENT  
UNDER 35 U.S.C. § 271(a) (‘866 PATENT)**

10. Plaintiffs hereby incorporates by reference the allegations of paragraphs 1 through 9 of this Complaint as if fully set forth herein.

11. Claim 1 of the ‘866 Patent covers “a double interface flash memory card, which has a first transmission interface and a circuit board with a microprocessor and a plurality of flash memory

thereon, comprising a first bus interface circuit especially for a system interface circuit of the flash memory card being able to perform signal transmission, a second bus interface circuit for the other information apparatuses, which are different from the flash memory card, being able to perform signal transmission, and an interface detection and switching circuit, electrically connecting with the first transmission interface, the first bus interface circuit and the second bus interface circuit, for detecting if there is an initializing signal generated from the system interface circuit and switching to the first bus interface circuit or the second bus interface circuit according to the initializing signal being generated or not generated, wherein, the microprocessor switches the status thereof to a working mode and a suitable system interface circuit mode is started according to what type of the system interface circuit being detected by the interface detection and switching circuit so that the microprocessor can detect, determine and support a connection action signal automatically, when either the first transmission interface or the second transmission interface offers the action signal at the transmission end thereof and, in the mean time, the microprocessor switches the circuit and the related electronic elements on the circuit board to support data transmission action of the first transmission interface or the second transmission interface in the flash memories.”

12. Defendant manufactures, imports into the United States, offers for sale, and/or sells flash memory storage devices which infringe at least Claim 1 of the ‘866 Patent (hereafter “Accused Product(s)”).

13. Defendant’s Accused Product(s) include, without limitation T250B Mobile & Go micro-USB, T250C Mobile & Go Type-C, T200 Mobile & Go, T400 Duo USB-C, T500 iCobra, T500 iCobra2, T750A Dual USB3.1 Lightning, T750B Dual USB3.1 micro-USB, and T750C Dual USB3.1 Type-C.

14. A claim chart comparing Claim 1 of the ‘866 Patent to the Accused Product(s) is attached as Exhibit B.

15. The Accused Product(s) includes a double interface flash memory card, which has a first transmission interface and a circuit board with a microprocessor and a plurality of flash memory thereon. See Exhibit B, p. 1 - 7.

16. The Accused Product(s) includes a first bus interface circuit especially for a system interface circuit of the flash memory card being able to perform signal transmission. See Exhibit B, p. 8.

17. The Accused Product(s) includes a second bus interface circuit for the other information apparatuses, which are different from the flash memory card, being able to perform signal transmission. See Exhibit B, p. 9 - 10.

18. The Accused Product(s) includes an interface detection and switching circuit, electrically connecting with the first transmission interface, the first bus interface circuit and the second bus interface circuit for detecting if there is an initializing signal generated from the system interface circuit and switching to the first bus interface circuit or the second bus interface circuit according to the initializing signal being generated or not generated, wherein the microprocessor switches the status thereof to a working mode and a suitable system interface circuit mode is started according to what type of the system interface circuit being detected by the interface detection and switching circuit so that the microprocessor can detect, determine and support a connection action signal automatically when either the first transmission interface or the second transmission interface offers the action signal at the transmission end thereof and, in the mean time, the microprocessor switches the circuit and the related electronic elements on the circuit board to support data transmission action of the first transmission interface or the second transmission interface in the flash memories. See Exhibit B, p. 11 - 13.

19. Each one of the elements included in the Infringing System, itemized in paragraphs 15 – 18 above, is an element in Claim 1 of the ‘866 Patent.

20. Plaintiff has been, and will continue to be, irreparably harmed by Defendant's ongoing infringement of the '866 Patent.

21. As a direct and proximate result of Defendant's infringement of the '866 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be determined.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for relief against Defendant as follows:

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

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

C. For such other and further relief, as may be just and equitable.

**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: December 31, 2019

Respectfully submitted,

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