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 13 **UNITED STATES DISTRICT COURT**
 14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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 17 NEODRON LTD.,

18 Plaintiff,

19 v.

20 MOTOROLA MOBILITY LLC.,

21 Defendant.
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Case No. 3:20-cv-01179

**COMPLAINT FOR PATENT
 INFRINGEMENT AGAINST
 MOTOROLA MOBILITY LLC**

DEMAND FOR JURY TRIAL

1 This is an action for patent infringement arising under the Patent Laws of the United States
2 of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Neodron Ltd. (“Plaintiff” or “Neodron”)
3 makes the following allegations against Defendant Motorola Mobility LLC (“Defendant”):

4 **INTRODUCTION**

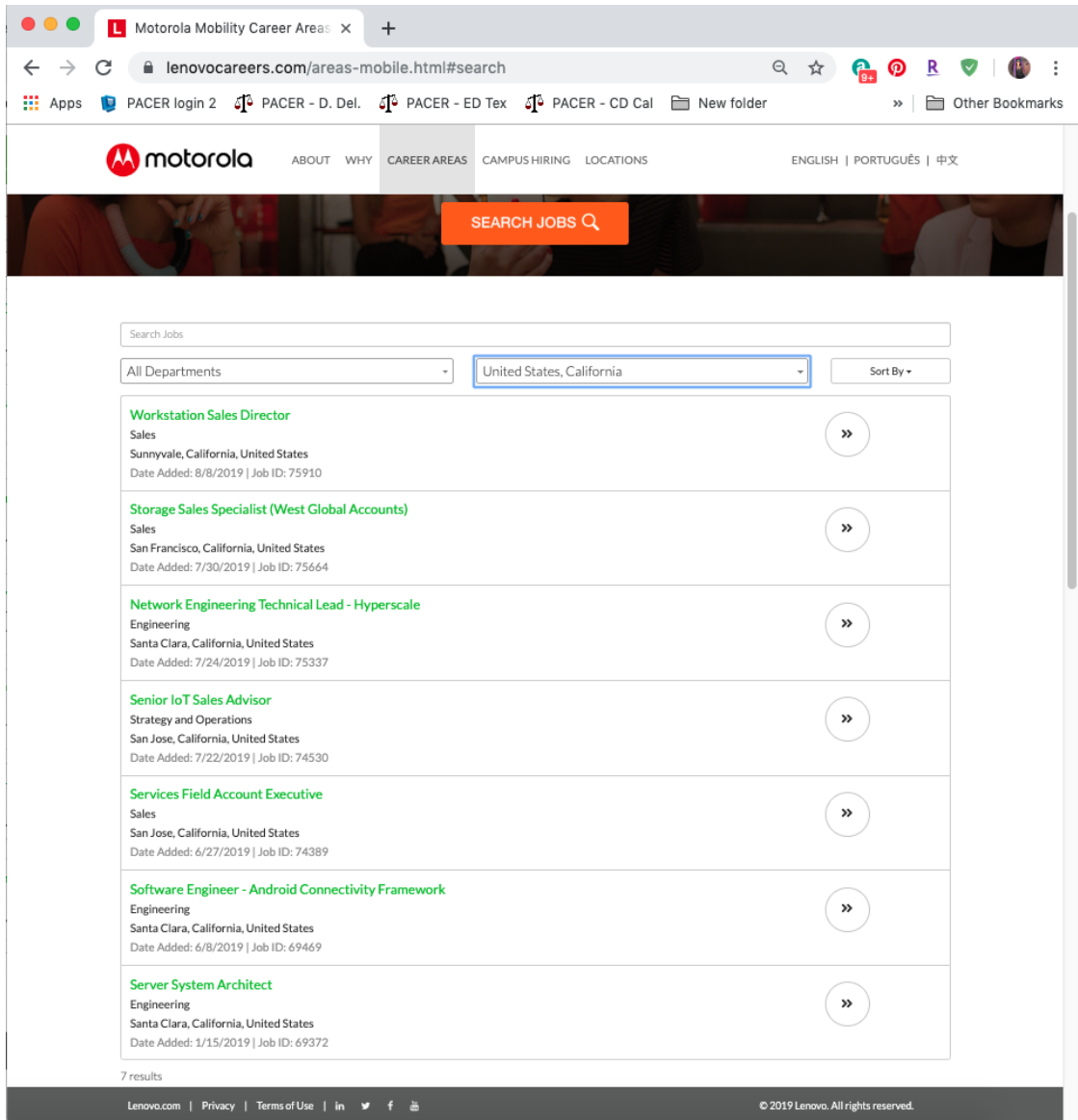
5 1. This complaint arises from Defendant’s unlawful infringement of the following
6 United States patents owned by Neodron, each of which generally relate to touchscreen
7 technology: United States Patent Nos. 7,903,092 (“’092 Patent”); 8,749,251 (“’251 Patent”); and
8 9,411,472 (“’472 Patent”) (collectively, the “Asserted Patents”).

9 2. Touchscreen technology plays a ubiquitous and important role in countless
10 electronic devices today. Beyond just providing greater usability to smartphones, tablets and
11 notebooks, touchscreens now fill our lives in public and private spaces, from our homes and cars
12 to the restaurants and stores we visit.

13 3. But just a few decades ago, touchscreen technology could only be found in science
14 fiction books and film. Although the underlying science behind touch technology can be traced
15 back to the 1940s, working touchscreens were not conceived and feasible until the mid-1960s,
16 when the first finger-driven touchscreen was invented by E.A. Johnson in 1965 at the Royal Radar
17 Establishment in Malvern, United Kingdom. Since then, it took several generations and major
18 technological advancements for touchscreens to achieve the level of complexity—and
19 convenience—we see and enjoy today.

20 4. Built on the fundamental breakthrough that our hands and fingers can form changes
21 in the capacitance of electrodes and electrode-connections when they are in close proximity to
22 them, touch technology has developed rapidly over the years. Along the way, engineers have
23 worked tirelessly to try to overcome the limitations and roadblocks touch technology presents.
24 From conceiving various ways to detect (and correctly ignore) unintentional touches, to
25 minimizing signal “noise,” to reducing the latency and power consumption that comes with any
26 complex, multi-part electrical process, there have been many advances to various aspects of the
27 technology—each building a little on a related advancement before it—to get us to the highly
28 advanced state we enjoy today.

1 engineering jobs, in this District, as shown below.¹



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INTRADISTRICT ASSIGNMENT

11. Pursuant to N.D. Cal. Local Rule 3-5(b) and 3-2(c), this civil action should be assigned on a district-wide basis because it pertains to “Intellectual Property Rights.”

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 7,903,092

12. Neodron realleges and incorporates by reference the foregoing paragraphs as if

¹ See, e.g., <https://lenovocareers.com/areas-mobile.html>.

1 fully set forth herein.

2 13. Neodron owns by assignment all rights, title, and interest in U.S. Patent No.
3 7,903,092 (the “’092 Patent”), entitled “Capacitive Keyboard with Position Dependent Reduced
4 Keying Ambiguity.” The ’092 Patent was duly and legally issued by the United States Patent and
5 Trademark Office on March 8, 2011. A true and correct copy of the ’092 Patent is attached as
6 Exhibit 1.

7 14. On information and belief, Defendant makes, uses, offers for sale, sells, and/or
8 imports certain products (“Accused Products”), such as the Motorola Moto G6, that directly
9 infringe, literally and/or under the doctrine of equivalents, claims 1–14 of the ’092 Patent.

10 15. Defendant also knowingly and intentionally induces infringement of claims 1–14
11 of the ’092 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this
12 Complaint, and also through the filing and service of a complaint with the United States
13 International Trade Commission (ITC) pursuant to Section 337 of the Tariff Act of 1930, 19 U.S.C.
14 § 1337, Defendant has had knowledge of the ’092 Patent and the infringing nature of the Accused
15 Products. Despite this knowledge of the ’092 Patent, Defendant continues to actively encourage
16 and instruct its customers and end users (for example, through user manuals and online instruction
17 materials on its website) to use the Accused Products in ways that directly infringe the ’092 Patent.
18 Defendant does so knowing and intending that its customers and end users will commit these
19 infringing acts. Defendant also continues to make, use, offer for sale, sell, and/or import the
20 Accused Products, despite its knowledge of the ’092 Patent, thereby specifically intending for and
21 inducing its customers to infringe the ’092 Patent through the customers’ normal and customary
22 use of the Accused Products.

23 16. The Accused Products satisfy all claim limitations of claims 1–14 of the ’092
24 Patent. A claim chart comparing independent claims 1, 2, and 13 of the ’092 Patent to
25 representative Accused Product, the Motorola Moto G6, is attached as Exhibit 2.

26 17. By making, using, offering for sale, selling and/or importing into the United States
27 the Accused Products, Defendant has injured Neodron and is liable for infringement of the ’092
28 Patent pursuant to 35 U.S.C. § 271.

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1 18. As a result of Defendant’s infringement of the ’092 Patent, Neodron is entitled to
2 monetary damages in an amount adequate to compensate for Defendant’s infringement, but in no
3 event less than a reasonable royalty for the use made of the invention by Defendant, together with
4 interest and costs as fixed by the Court.

5 19. Defendant’s infringing activities have injured and will continue to injure Neodron,
6 unless and until this Court enters an injunction prohibiting further infringement of the ’092 Patent,
7 and, specifically, enjoining further manufacture, use, sale, importation, and/or offers for sale that
8 come within the scope of the patent claims.

9 **COUNT II**

10 **INFRINGEMENT OF U.S. PATENT NO. 8,749,251**

11 20. Neodron realleges and incorporates by reference the foregoing paragraphs as if
12 fully set forth herein.

13 21. Neodron owns by assignment all rights, title, and interest in U.S. Patent No.
14 8,749,251 (the “’251 Patent”), entitled “Proximity Sensor” The ’251 Patent was duly and legally
15 issued by the United States Patent and Trademark Office on June 10, 2014. A true and correct copy
16 of the ’251 Patent is attached as Exhibit 3.

17 22. On information and belief, Defendant makes, uses, offers for sale, sells, and/or
18 imports certain products (“Accused Products”), such as the Motorola Moto G6, that directly
19 infringe, literally and/or under the doctrine of equivalents, claims 1–20 of the ’251 Patent.

20 23. Defendant also knowingly and intentionally induces infringement of claims 1–20
21 of the ’251 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this
22 Complaint, and also through the filing and service of a complaint with the United States
23 International Trade Commission (ITC) pursuant to Section 337 of the Tariff Act of 1930, 19 U.S.C.
24 § 1337, Defendant has had knowledge of the ’251 Patent and the infringing nature of the Accused
25 Products. Despite this knowledge of the ’251 Patent, Defendant continues to actively encourage
26 and instruct its customers and end users (for example, through user manuals and online instruction
27 materials on its website) to use the Accused Products in ways that directly infringe the ’251 Patent.
28 Defendant does so knowing and intending that its customers and end users will commit these

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1 infringing acts. Defendant also continues to make, use, offer for sale, sell, and/or import the
2 Accused Products, despite its knowledge of the '251 Patent, thereby specifically intending for and
3 inducing its customers to infringe the '251 Patent through the customers' normal and customary
4 use of the Accused Products.

5 24. The Accused Products satisfy all claim limitations of claims 1–20 of the '251
6 Patent. A claim chart comparing independent claims 1 and 16 of the '251 Patent to representative
7 Accused Product, the Motorola Moto G6, is attached as Exhibit 4.

8 25. By making, using, offering for sale, selling and/or importing into the United States
9 the Accused Products, Defendant has injured Neodron and is liable for infringement of the '251
10 Patent pursuant to 35 U.S.C. § 271.

11 26. As a result of Defendant's infringement of the '251 Patent, Neodron is entitled to
12 monetary damages in an amount adequate to compensate for Defendant's infringement, but in no
13 event less than a reasonable royalty for the use made of the invention by Defendant, together with
14 interest and costs as fixed by the Court.

15 27. Defendant's infringing activities have injured and will continue to injure Neodron,
16 unless and until this Court enters an injunction prohibiting further infringement of the '251 Patent,
17 and, specifically, enjoining further manufacture, use, sale, importation, and/or offers for sale that
18 come within the scope of the patent claims.

19 **COUNT III**

20 **INFRINGEMENT OF U.S. PATENT NO. 9,411,472**

21 28. Neodron realleges and incorporates by reference the foregoing paragraphs as if
22 fully set forth herein.

23 29. Neodron owns by assignment all rights, title, and interest in U.S. Patent No.
24 9,411,472 (the "'472 Patent"), entitled "Touch Sensor with Adaptive Touch Detection
25 Thresholding." The '472 Patent was duly and legally issued by the United States Patent and
26 Trademark Office on August 9, 2016. A true and correct copy of the '472 Patent is attached as
27 Exhibit 5.

28 30. On information and belief, Defendant makes, uses, offers for sale, sells, and/or

1 imports certain products (“Accused Products”), such as the Motorola Moto G6, that directly
2 infringe, literally and/or under the doctrine of equivalents, claims 1–23 of the ’472 Patent.

3 31. Defendant also knowingly and intentionally induces infringement of claims 1–23
4 of the ’472 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this
5 Complaint, and also through the filing and service of a complaint with the United States
6 International Trade Commission (ITC) pursuant to Section 337 of the Tariff Act of 1930, 19 U.S.C.
7 § 1337, Defendant has had knowledge of the ’472 Patent and the infringing nature of the Accused
8 Products. Despite this knowledge of the ’472 Patent, Defendant continues to actively encourage
9 and instruct its customers and end users (for example, through user manuals and online instruction
10 materials on its website) to use the Accused Products in ways that directly infringe the ’472 Patent.
11 Defendant does so knowing and intending that its customers and end users will commit these
12 infringing acts. Defendant also continues to make, use, offer for sale, sell, and/or import the
13 Accused Products, despite its knowledge of the ’472 Patent, thereby specifically intending for and
14 inducing its customers to infringe the ’472 Patent through the customers’ normal and customary
15 use of the Accused Products.

16 32. The Accused Products satisfy all claim limitations of claims 1–23 of the ’472
17 Patent. A claim chart comparing independent claims 1 and 13 of the ’472 Patent to representative
18 Accused Product, the Motorola Moto G6, is attached as Exhibit 6.

19 33. By making, using, offering for sale, selling and/or importing into the United States
20 the Accused Products, Defendant has injured Neodron and is liable for infringement of the ’472
21 Patent pursuant to 35 U.S.C. § 271.

22 34. As a result of Defendant’s infringement of the ’472 Patent, Neodron is entitled to
23 monetary damages in an amount adequate to compensate for Defendant’s infringement, but in no
24 event less than a reasonable royalty for the use made of the invention by Defendant, together with
25 interest and costs as fixed by the Court.

26 35. Defendant’s infringing activities have injured and will continue to injure Neodron,
27 unless and until this Court enters an injunction prohibiting further infringement of the ’472 Patent,
28 and, specifically, enjoining further manufacture, use, sale, importation, and/or offers for sale that

1 come within the scope of the patent claims.

2
3 **PRAYER FOR RELIEF**

4 WHEREFORE, Neodron respectfully requests that this Court enter:

5 a. A judgment in favor of Neodron that Defendant has infringed, either literally and/or
6 under the doctrine of equivalents, the '092 Patent, the '251 Patent, and the '472 Patent;

7 b. A permanent injunction prohibiting Defendant from further acts of infringement of
8 the '092 Patent, the '251 Patent, and the '472 Patent;

9 c. A judgment and order requiring Defendant to pay Neodron its damages, costs,
10 expenses, and pre-judgment and post-judgment interest for Defendant' infringement of the '092
11 Patent, the '251 Patent, and the '472 Patent; and

12 d. A judgment and order requiring Defendant to provide an accounting and to pay
13 supplemental damages to Neodron, including without limitation, pre-judgment and post-judgment
14 interest;

15 e. A judgment and order finding that this is an exceptional case within the meaning
16 of 35 U.S.C. § 285 and awarding to Neodron its reasonable attorneys' fees against Defendant; and

17 f. Any and all other relief as the Court may deem appropriate and just under the
18 circumstances.

19 **DEMAND FOR JURY TRIAL**

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

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24 Dated: February 14, 2020

Respectfully submitted,

25 /s/ Reza Mirzaie

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