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5 *Pro Se* Plaintiff

6 UNITED STATES DISTRICT COURT  
7  
8 NORTHERN DISTRICT OF CALIFORNIA

9 Xiaohua Huang *Pro Se*,  
10 Plaintiff,  
11 v.  
12 Genesis Global  
13 Genesis Global Hardware, Inc.,  
14 Defendant.

Case No. 3:20-cv-07751-JCS

**MR. Huang's revised second amended  
complaint against Steve Morrow,  
Genesis Global Hardware, Inc. and  
Genesis Global for patent infringement  
in response to Defendant's motion to  
dismiss (ECF No.16)**

Demand for Jury Trial

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19 In response to Defendant's motion to dismiss (ECF.No.16) Plaintiff  
20 respectfully submits the second amended complaint. Plaintiff Xiaohua Huang  
21 (hereinafter "Huang" or "Plaintiff") alleges as follows:

22 **NATURE OF THE ACTION**

23 1. This is an action for patent infringement arising out of U.S. Patent No.  
24 6,999,331 (hereinafter the "331 Patent") issued on Feb 14, 2006 and U.S. patent  
25 RE45259 issued on Nov.25, 2014 (hereinafter the "RE259 Patent") to Xiaohua  
26 Huang. This action is brought to remedy the infringement of '331patent and  
27 'RE259Patent. This action is brought to remedy the infringement of '331patent  
28 and 'RE259Patent by Defendant Genesis Global Hardware, Inc, Genesis Global

1 and Steve Morrow (hereinafter “Genesis Global Hardware,” or “Defendant”)

## 2 **THE PARTIES**

3 2. Xiaohua Huang is an individual, his current residential address is at Los  
4 Gatos, CA95030. Huang has developed the state of the art high speed and low  
5 power U.S. patented TCAM designs to build IC chips used inside of Internet IP  
6 Routers(“Routers”), Wireless routers, Ethernet Switches(“Switches”) and Data  
7 Center Switches etc. since the year of 2000.

8  
9 3. Genesis Global (GGI Networks Outlet) is or purports to be a California  
10 company having its mailing address in 3031 Stanford Ranch Rd Ste. 2 #110 Rocklin,  
11 CA 95765-5554 with is website <https://www.genesisglobal.com/> . Genes Global  
12 Hardware, Inc.is or purports to be a company which share same website  
13 <https://www.genesisglobal.com/> with Genesis Global. Both Genesis Global  
14 Hardware, Inc.( Genesis Global Hardware) and Genes Global has the same contact  
15 telephone number (916) 415-9900, website <https://www.genesisglobal.com/> and same  
16 owner Steve Morrow. Genes Global and Genesis Global Hardware is a reseller of  
17 networking Switches and Routers which have been manufactured in Silicon Valley  
18 by the company located in Silicon Valley Northern California.

## 19 **JURISDICTION AND VENUE**

20  
21 4. This action arises under the patent laws of the United States, 35 U.S.C.  
22 § 101, *et seq.* This Court has jurisdiction over the subject matter of this action  
23 pursuant to 28 U.S.C. §§ 1331 and 1338(a). Venue is proper in this District  
24 pursuant to 28 U.S.C. §§1391(b) - (c) and 1400(b) in that Defendant has bought  
25 and sold the products which have been made in this District by the company,  
26 such as Cisco System, Extreme Networks, Juniper Networks and Brocade,  
27 located in Silicon Valley this District. Defendant has committed acts of  
28 infringement through buying and selling “Switches”, “Routers” which infringes

1 the claim1 of ‘331patent and claim 29 of ‘RE259patent within this District of  
2 California daily and regularly.

3 5. On May 22, 2017, in TC Heartland LLC v. Kraft Foods Group Brands  
4 LLC, the Supreme Court’s opinion by Justice Thomas established that the term  
5 “resides” refers only to the state of incorporation under the patent venue  
6 statute, 28 U.S.C. § 1400(b). Defendant is incorporated in California and  
7 resides in California.  
8

9 6. Since May22,2017 there is only one district court case that has the  
10 question of multi-district states after TC Heartland, Judge Gilstrap of the  
11 Eastern District of Texas explained that he was “not persuaded that ‘resides’ in  
12 this context refers to anything more than a defendant’s state of incorporation.”  
13 Diem LLC v. BigCommerce, Inc., No. 6:17-cv-186, 2017 WL 3187473 (E.D. Tex.  
14 July 26, 2017). The court held that in patent infringement a Texas corporation  
15 “resides” in all the judicial districts of that state. A California Corporation  
16 “resides” in all the judicial districts of this state.

17 7. The Court acknowledged that the Fourco court held that the word  
18 ‘resident,’ as used in § 1400(b), was ‘synonymous’ with the word ‘inhabitant’ in  
19 the pre-1948 statute. But it pointed out that Fourco’s express language was  
20 that these terms “mean the state of incorporation only.” It concluded that the  
21 definition of “resident” established in Fourco and reaffirmed in TC Heartland is  
22 in tension with the definition of “inhabitant” that the Supreme Court applied in  
23 pre-Fourco cases.

24 8. TC Heartland brings a new focus on the second prong of § 1400(b),  
25 regarding the interpretation of “where the defendant has committed acts of  
26 infringement and has a regular and established place of business.” “A regular  
27 and established place of business.” the Federal Circuit in re Cordis Corp., 769  
28

1 F.2d 733, 737 (Fed. Cir. 1985) defined the appropriate inquiry as, “whether the  
2 corporate defendant does its business in that district through a permanent and  
3 continuous presence there and not whether it has a fixed physical presence in  
4 the sense of a formal office or store.” Defendant Genesis Global Hardware, Inc.  
5 has been permanently (more than 20 years) and continuously buying the  
6 products at issue from Cisco Systems, Extreme Networks, Juniper Network etc.  
7 and reselling the products at issue to the data centers and its other customers  
8 to has committed acts of infringement in Silicon Valley this judicial district.

9  
10 9. Congress sought to restrict venue in these actions to those places where  
11 that mass of technical data is located. The technical data of products of Cisco  
12 Systems, Extreme Network, Juniper Network, Brocade and its witness of  
13 technical expert are all in Silicon Valley where Cisco System, Extreme Network,  
14 Juniper Network and Brocade locate, so the venue of this case should be  
15 restricted to this judicial district.

16 10. SIT brought suit against Google in the Eastern District of Texas arguing  
17 that venue was proper under the patent venue statute (28 U.S.C. § 1400(b)).  
18 SIT filed its suit after the Supreme Court’s decision in TC Heartland LLC v.  
19 Kraft Foods Group Brands LLC, 137 S. Ct. 1514, 1517 (2017), which held that  
20 “a domestic corporation ‘resides’ only in its State of incorporation for purposes  
21 of the patent venue statute”. SIT alleged venue was proper because Google  
22 allegedly committed acts of infringement in the Eastern District of Texas and  
23 has a regular and established place of business there at the time of SIT first  
24 brought suit.

25 11. Defendant is just a reseller of Networking products manufactured by  
26 Cisco System, Juniper Network, Extreme Network, Brocade etc. Defendant  
27 conducted its business online through google platform, the products in issue  
28

1 Defendant bought and sold in Silicon Valley through online google platform  
2 which are built and root in Silicon Valley, which are all in this Judicial  
3 District.

4 **BACKGROUND FACTUAL ALLEGATION**

5  
6 12. A true and correct copy of the '331 patent and 'RE259 patent is attached  
7 hereto as Exhibit A and C. The '331 patent and 'RE259 patent is valid and  
8 owned by Plaintiff Mr. Huang as the inventor.

9 13. In Nov. 2000 "Huang" found CMOS Micro Device Inc. "CMOS") to  
10 develop Ternary Content Addressable Memory (TCAM). "Huang" is the owner  
11 of "CMOS", "CMOS" is a California corporation and having its office in  
12 Campbell, California. TCAM are used to perform the search function in  
13 internet networking router, switches and Data Center Switches.

14  
15 14. From November, 2000 to October, 2002, Huang finished the design of  
16 ternary content addressable memory ( TCAM) with 0.18um and 90nm TSMC  
17 technology which are covered by the '331 Patent and 'RE259 patent. The TCAM  
18 designed by Huang is tens to hundreds of times faster in speed and consume  
19 much less power than the same products in Market at that time. Then Huang  
20 shared his patent application with two Cisco executives, they were GM and VP  
21 of Router and Gigabit Switches division respectively. They both consider that  
22 Huang's patent of TCAM are the best solution among all the vendors and asked  
23 Huang to review their next generation TCAM specification and do a feasible  
24 design to evaluate the product performance (see Exhibit R). Plaintiff did TCAM  
25 design based on the request and emailed his TCAM design and analysis to the  
26 General manager of Gigabit Switch division before the end of October of 2002.  
27 Cisco used Huang's design in its Quantum flow processor chip which was  
28 manufactured first in the year of 2007. The quantum flow processor is used in

1 the chips used in Cisco ASR 1000 Routers. Mr. Huang reversed the main chip  
2 of Cisco ASR 1000 Router with Cellixsoft Corporation's Help. The main chip of  
3 Cisco ASR 1000 Router has the manufacture No: 2007 TI F751801A, the serial  
4 No. on the package include "Cisco Systems 08-0697-02". One schematic of  
5 TCAM extracted from this chip is same as the TCAM design Plaintiff did for  
6 Cisco in the year of 20002, which read the claim 1 of '331 patent ( see page 7 of  
7 Exhibit N and page 8 of Exhibit R).

8 15. In 2001 the chairman of NetlogicMicrosystemInc. (acquired by  
9 Broadcom) invested CMOS Micro Device Inc., then obtained the TCAM design  
10 which Plaintiff invented, later Huang returned the investment back and the  
11 Santa Clara supreme Court ruled that personal of NetlogicMicrosystem,Inc.  
12 can not use the data they took from CMOS Micro Device Inc. and Plaintiff  
13 Huang. From 2011 to 2018 Plaintiff reversed numerous TCAM chips of  
14 NetlogicMicrosystem and TCAM chips of Renesas Electronics. With the help  
15 of Cellixsoft Corporation and Wuxi Hengyu Micro Electronics Ltd. Plaintiff  
16 obtained the evidence that the TCAM chips of Netlogic Microsystems and  
17 TCAM chips of Renesas Electronics, Inc. used the content of US patent  
18 6999331 and RE45259(Exhibit M, Exhibit N). The TCAM chips of Netlogic  
19 Microsystems and Renesas Electronics infringed the claim 29 of US patent  
20 RE45259. Most switches and Routers of Cisco Systems, Extreme Networks,  
21 Juniper Networks, Brocade have used the TCAM chips of  
22 NetlogicMicrosystems Inc. and Renesas.

23  
24 16. In 2003 Plaintiff found that a company called Silicon Design Solution  
25 Inc.(SDS) selling TCAM design same as the TCAM designed by CMOS Micro  
26 Device Inc., which is highly suspected to copy the TCAM design of CMOS Micro  
27 Device Inc. through a layout designer of CMOS Micro Device Inc. Recently  
28 Plaintiff found that SDS sold the TCAM design to the company such as Open

1 Silicon and Avago Technology and Cisco etc. Recently Plaintiff also found that  
 2 Avago Technology designed networking chips with the TCAM obtained from  
 3 SDS for Cisco Systems, Juniper Network, Brocade, HPE, ZTE and Dell etc. The  
 4 brief data sheet of the TCAM sold by SDS is attached as Exhibit E. Plaintiff  
 5 also obtained the source code of TCAM sold by SDS, most of them are same as  
 6 the TCAM designed by Plaintiff in the year of 2001 at CMOS Micro Device Inc.

7  
 8 17. '331Patent and 'RE259patent is the basic fundamentals to design high  
 9 speed and low power TCAM used in 4G,5G wireless routers, Internet Router and  
 10 Switches as well as Data Center Switches up to today. The TCAM designed by  
 11 Huang provide the example design using '331 Patent and 'RE259patent. By using  
 12 the '331Patent and 'RE259patent the TCAM used in Routers and Switches helps  
 13 Internet transfer information Hundreds of time faster.

14 18. The patented TCAM developed by Huang has been recognized by the  
 15 industry. In 2003 Huang was an invited speaker to present his TCAM design at  
 16 networking symposium at Boston organized by the Industry Authority Linley  
 17 Group. In 2015 Huang was also a presenter of MEMCON 2015 in Santa Clara  
 18 convention center to present his patented TCAM design.

19 19. The ternary content addressable memory component are used as table  
 20 look up function and used in 4G, 5G wireless router, internet router and  
 21 switches as well as data center switches to perform table look up to realize  
 22 access control list (ACL), Quality of Service(QoS), VLAN, LPM, Packet  
 23 forwarding and other parallel searching.

24  
 25 **THE INFRINGING PRODUCTS WHICH DEFENDANT**  
 26 **MAY HAVE BOUGHT AND SOLD**

27 20. The Catalyst Switches WS-C3750,WS-C4900,WS-C6500 of Cisco System,  
 28 MX series Router of Juniper Network and Brocade 4000 series, Brocade48000 series

1 use TCAM chips of Renesas and NetlogicMicrosystems, including but not limited to:  
2 NL9512,R8A20400 etc. The following is the picture of TCAM chips and the layout  
3 inside the chips used in the above Networking Switches:



13 A schematic and logic of TCAM extracted from the above chips is in Figure2  
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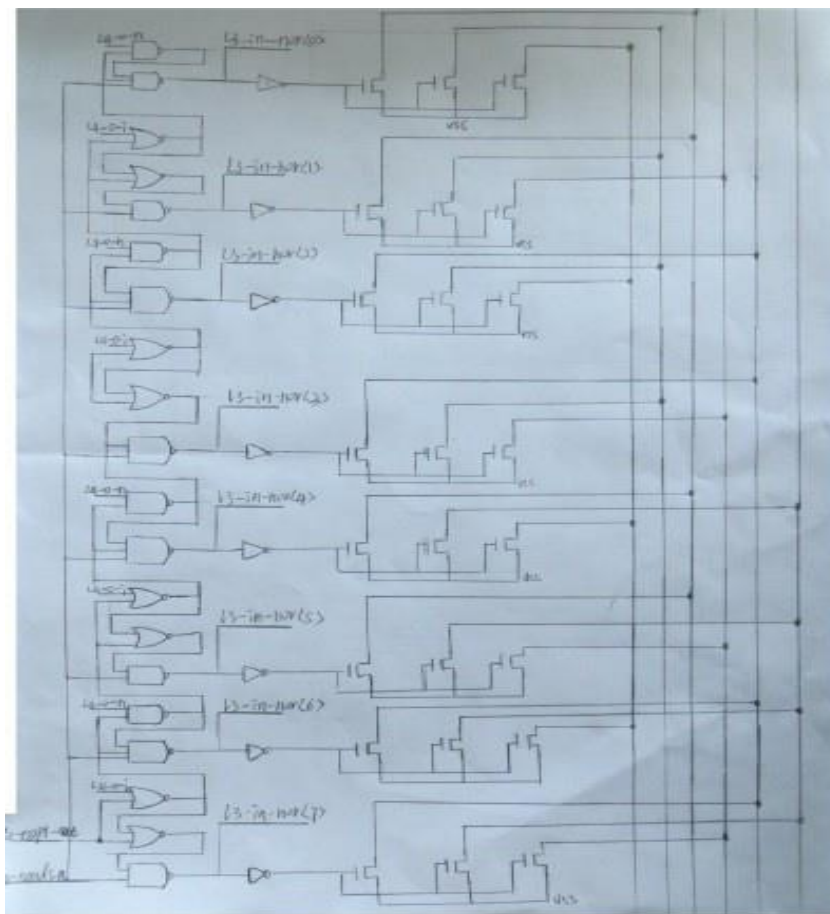


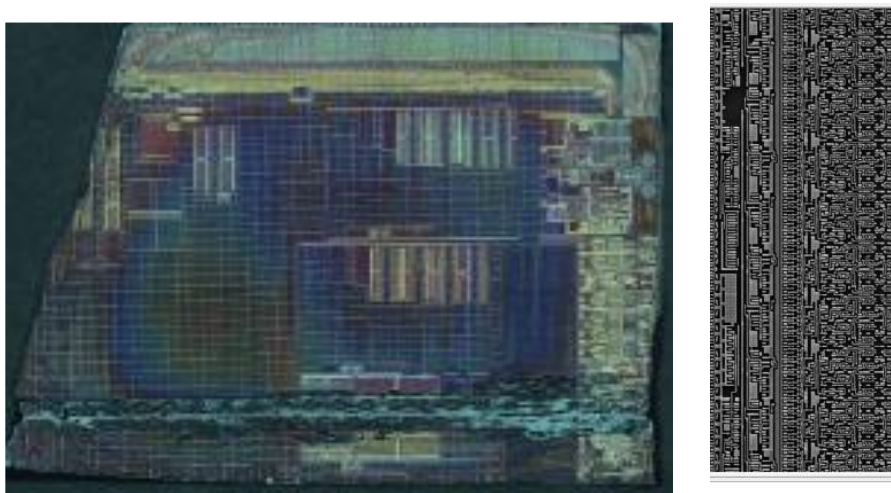
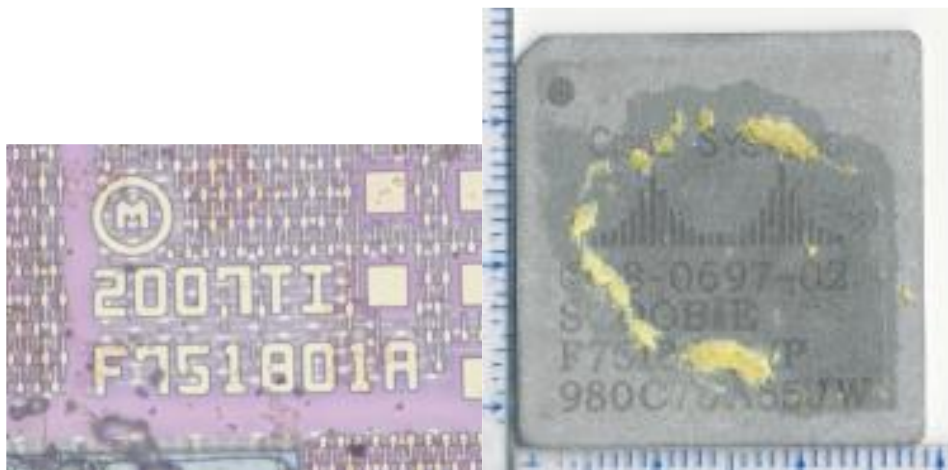
Figure 2.

claim	TCAM in the Chips 75K72234,75S10005 of Netlogic Microsystem used in The Catalyst Switches WS-C3750,WS-C4900,WS-C6500 of Cisco System, MX series Router of Juniper Network and Brocade 4000 series, Brocade48000
Claim 29 of US patent RE45259	This claim 29 reads on the schematics of FIG. 2 .The dynamic circuit in FIG.2 are subset of the limitation described by this claim.
A content addressable memory (CAM) system, comprising:	This is preamble

<p>(1)a circuit segment configured to generate a circuit segment output based on whether at least one of a plurality of circuit segment inputs received by the circuit segment corresponds to a first logic level,</p>	<p>(1) The output in the right side of Figure.2 rely the logic level of input signal in the left side, which are read by the corresponding section of claim</p>
<p>(2) the circuit segment configured to set a node to a second logic level in response to an input signal, and</p>	<p>(2) First of all the output nodes in the right side of Figure 2 needs to be set to high logical level before the input signal in the left side arrival, which are read by the corresponding section of the claim.</p>
<p>(3) to subsequently change the node to a third logic level in response to the plurality of circuit segment inputs, the circuit segment output corresponding to said third logic level.</p>	<p>(3) The logic level of output nodes in Figure2 will change after being set to high logic level, whether change or not rely on the logic level of the input signal in the left side , the logic level change of output follow the arrival of the input signal in the left side, which is read by the corresponding section of the claim.</p>

So the TCAM chips of Netlogic Microsystem (acquired by Broadcom) and Renesas are read by claim 29 of US patent RE45259. Then the Catalyst Switches WS-C3750, WS-C4900, WS-C6500 etc. of Cisco System, MX series Router of Juniper Network and Brocade 4000 series, Brocade 48000 series use TCAM chips of Renesas and Netlogic Microsystems. Those networking products of Cisco, Juniper Network, Extreme Network and Brocade, bought and sold by Defendant, are read by claim 29 of US patent RE45259.

21. Based on its company website the routers and Switches which Genesis Global Hardware sold including but not limited to: ASR 1000 Aggregation Services Routers. The main chip of Cisco ASR 1000 Router has the manufacture No: 2007 TI F751801A, the serial No. on the package include “Cisco Systems 08-0697-02”. Plaintiff reversed this chip with Cellixsoft Corporation’s help. The picture of the chip and the layout inside the chip is in the below:



One schematic of TCAM extracted from this chip is in Figure 1.

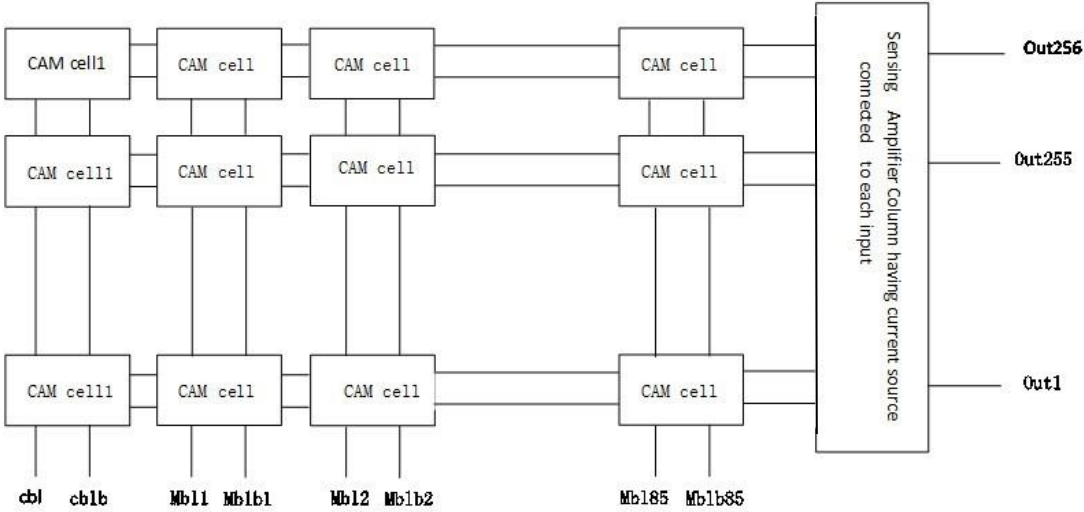


Figure 1.

which is same as the TCAM design Plaintiff did for Cisco in the year of 20002, which read the claim 1 of ‘331patent ( see page 8 of Exhibit R).

Claim 1 of US patent 6999331	The TCAM in accused instrument Cisco Systems 08-0697-02 chip in ASR1000 Router
(1) A ternary content addressable memory (TCAM) comprising: an array of TCAM cells arranged in a plurality of rows and a plurality of columns;	This section(1) of the claim read the CAM cell box in Figure1.
(2) a plurality of match lines, one match line for each row of	This Section(2) of the claim read the two line (match, dummy)

<p>1 <i>TCAM cells and operatively</i></p> <p>2 <i>coupled to a plurality of output</i></p> <p>3 <i>transistors for the TCAM cells in</i></p> <p>4 <i>each row;</i></p> <p>5</p> <p>6 <i>a plurality of dummy lines, one</i></p> <p>7 <i>dummy line for each row of TCAM</i></p> <p>8 <i>cells and operatively coupled to a</i></p> <p>9 <i>plurality of dummy transistors for</i></p> <p>10 <i>the TCAM cells in each row;</i></p>	<p>connected to each CAM cells in each row in Figure 1.</p>
<p>11 <i>(3)a plurality of match data bit</i></p> <p>12 <i>lines and their complements, one</i></p> <p>13 <i>pair of match data bit line and its</i></p> <p>14 <i>complement for each column of</i></p> <p>15 <i>TCAM cells to provide a match data</i></p> <p>16 <i>and its complement to compare with</i></p> <p>17 <i>the content stored in each TCAM</i></p> <p>18 <i>cell of that column;</i></p>	<p>This Section(3) of the claim read the line of mbl1 and mblb1 connected to each CAM cell in each column.</p>
<p>21 <i>(4)a column of dummy TCAM</i></p> <p>22 <i>(DTCAM) cells, each connected to</i></p> <p>23 <i>the match line and the dummy</i></p> <p>24 <i>line in each row;</i></p> <p>25 <i>a pair of dummy match data bit line</i></p> <p>26 <i>and its complement for the column</i></p> <p>27 <i>of DTCAM cells to provide a dummy</i></p>	<p>This section(4) of the claim read the very left column in Figure1.</p>

<p>1 <i>match data and its complement to</i></p> <p>2 <i>compare with the content stored in</i></p> <p>3 <i>each DTCAM cell;</i></p>	
<p>5 <i>(5)a sense amplifier connected</i></p> <p>6 <i>to the match line and the dummy</i></p> <p>7 <i>line in each row; and</i></p> <p>8 <i>current sources connected to each of</i></p> <p>9 <i>the match line and the dummy line</i></p> <p>10 <i>in each row.</i></p>	<p>This section (5)of the claim read</p> <p>the very right column which is the</p> <p>sense amplifier column connected to</p> <p>the each row of CAM cell through</p> <p>match and dummy line.</p>

12 So the TCAM used in the main chip “Cisco Systems 08-0697-02” made in 2007 by

13 Texas Instrument (TI) of the Cisco ASR 1000 Router are read by claim1 of

14 ‘331patent.

15 **COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6744653**

16 22. Plaintiff Mr. Huang refers to and incorporates herein the allegations of

17 Paragraphs 1-21 above.

18 23. On Feb.14, 2006, U.S. Patent No.6999331 (the “‘331Patent”) was duly

19 and legally issued for a “CAM cells and differential sense circuit for content

20 addressable memory (CAM).” A true and correct copy of the ‘331 patent is

21 attached hereto as Exhibit C. Xiaohua Huang as inventor is the owner of all

22 rights, title, and interest in and to the ‘331 patent.

23 24. On information and belief, Defendant Genesis Global Hardware etc.

24 have infringed and continue to infringe directly, indirectly, literally, on

25 Doctrine of Equivalent one or more of the claims of the‘331patent through

26 buying/selling the Catalyst Switches WS-C3750,WS-C4900,WS-C6500 etc. of

27 Cisco System, MX series Router of Juniper Network and Brocade 4000 series,

28

1 Brocade48000 series, those product devices containing “TCAM ” which have  
2 infringed at least claim 1 of the ‘331patent as analyzed in paragraph21 and  
3 Exhibit T under 35 U.S.C. § 271(a), (b) and(c).

4       25. On information and belief, Genesis Global and Genesis Global Hardware  
5 have induced its Customers to have infringed and continue to infringe directly,  
6 indirectly, literally, on Doctrine of Equivalent one or more of the claims of the  
7 ‘331patent by transferring data through Networking Routers and Switches of  
8 Internet and Data centers. Those Networking Routers and Switches using  
9 “TCAM” which have infringed at least claim 1 of the‘331patent as analyzed in  
10 paragraph 21 and Exhibit T under 35 U.S.C. § 271(a), (b) and (c).

11       26. On information and belief, Genesis Global and Genesis Global  
12 Hardware have made contributory infringement directly, indirectly, literally,  
13 on Doctrine of Equivalent to one or more of the claims of ‘331patent by its  
14 customers adding its Switches and Routers to Internet System and transferring  
15 data through the TCAM for its basic ACL and QoS function which have  
16 infringed at least claim 1 of the‘331patent as analyzed in paragraph 21 and  
17 Exhibit T under 35 U.S.C. § 271(a), (b) and(c). The using of TCAM to achieve  
18 ACL and QoS function of routers and switches accused are completely not a  
19 staple article or commodity of commerce suitable for substantial non-infringing  
20 use.

21       27. Defendant Genesis Global Hardware , Genesis Global and Steve  
22 Morrow’s acts of infringement, inducing infringement and contributory  
23 infringement have caused damage to Xiaohua Huang, and Xiaohua Huang is  
24 entitled to recover from Defendant Genesis Global Hardware, Genesis Global  
25 and Steve Morrow for the damages sustained by Xiaohua Huang as a result of  
26 Defendant Genesis Global Hardware, Genesis Global and Steve Morrow’s  
27  
28



wrongful acts in an amount subject to proof at trial. Defendant Genesis Global Hardware, Genesis Global and Steve Morrow 's infringement of Xiaohua Huang exclusive rights under the '653patent patent will continue to damage Xiaohua Huang, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court. Defendant Genesis Global Hardware, Genesis Global and Steve Morrow 's infringement entitle Xiaohua Huang to recover damages under 35 U.S.C.§284 and to attorneys' fees and costs incurred in prosecuting this action under35 U.S.C. § 285.

## **COUNT II: INFRINGEMENT OF U.S. PATENT NO. RE45259**

28. Plaintiff refers to and incorporates herein the allegations of Paragraphs 1-21 above.

29. On November 25, 2014 U.S. Patent No. RE45259 (the“RE259Patent”) was duly and legally issued for a “Hit ahead hierarchical scalable priority encoding logic and circuits.” A true and correct copy of the 'RE259patent is attached hereto as Exhibit A. Xiaohua Huang as inventor is the owner of all rights, title, and interest in and to the 'RE259 patent.

30. On information and belief, Genesis Global has infringed and continue to infringe directly, indirectly, literally, on Doctrine of Equivalent one or more of the claims of the'RE259 patent through buying /selling the Catalyst Switches WS-C3750,WS-C4900,WS-C6500 etc. of Cisco System, MX series Router of Juniper Network and Brocade 4000 series, Brocade48000 series, those product devices containing “TCAM ” which have infringed at least claim 29 of the 'RE259patent as analyzed in paragraph 20 and Exhibit T under 35 U.S.C. § 271(a), (b) and(c).

31. On information and belief, Genesis Global has induced its Customers to have infringed and continue to infringe directly, indirectly, literally, on Doctrine of Equivalent the claim 29 of the 'RE259 patent by transferring data through TCAM used in Networking Routers and Switches of Internet and Data centers. Those “TCAM” have infringed at least



1 claim 29 of the 'RE259 patent as analyzed in paragraph 20 and Exhibit T under 35 U.S.C. §  
2 271(a), (b) and (c).

3 32. On information and belief, Genesis Global has made contributory infringement  
4 directly, indirectly, literally, on Doctrine of Equivalent to the claim 29 of 'RE259 patent by  
5 its customers adding its Switches and Routers to Internet System and  
6 transferring data through the TCAM for its basic ACL and QoS function which  
7 have infringed at least claim 29 of the 'RE259 patent as analyzed in paragraph  
8 20 and Exhibit T under 35 U.S.C. § 271(a), (b) and (c). The using of TCAM to  
9 achieve ACL and QoS function of routers and switches accused are completely  
10 not a staple article or commodity of commerce suitable for substantial non-  
11 infringing use.

12 33. Defendant Genesis Global's acts of infringement, inducing infringement and  
13 contributory infringement have caused damage to Xiaohua Huang, and Xiaohua Huang is  
14 entitled to recover from Defendant Genesis Global for the damages sustained by Xiaohua  
15 Huang as a result of Defendant Genesis Global's wrongful acts in an amount subject to  
16 proof at trial. Defendant Genesis Global's infringement of Xiaohua Huang exclusive rights  
17 under the 'RE259 patent will continue to damage Xiaohua Huang, causing irreparable harm  
18 for which there is no adequate remedy at law, unless enjoined by this Court. Defendant  
19 Genesis Global's infringement entitle Xiaohua Huang to recover damages under 35  
20 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35  
21 U.S.C. § 285.

### 22 23 **JURY DEMAND**

24 34. Pursuant to Fed. R. Civ. P. 38(b), Plaintiff Xiaohua Huang requests a  
25 trial by jury on all issues.

### 26 27 **PRAYER FOR RELIEF**

1 WHEREFORE, Xiaohua Huang prays for the following relief:

2 (a). A judgment in favor of Xiaohua Huang that Defendant has infringed  
3 and is infringing U.S. Patent No 6999331 and RE45259;

4 (b). A judgment that the '331 and 'RE259 patent are valid and enforceable;

5 (c). An order preliminarily and permanently enjoining Defendant and its  
6 subsidiaries, parents, officers, directors, agents, servants, employees, affiliates,  
7 attorneys and all others in active concert or participation with any of the  
8 foregoing, from further acts of infringement of the '331 patent and 'RE259;  
9

10 (d). An accounting for damages resulting from Defendant's infringement of  
11 the '331 and 'RE259 patent under 35 U.S.C. § 284;  
12

13 (e). An assessment of interest on damages;

14 (f). A judgment awarding damages to Xiaohua Huang for its costs,  
15 disbursements, expert witness fees, and attorneys' fees and costs incurred in  
16 prosecuting this action, with interest pursuant to 35 U.S.C. § 285 and as  
17 otherwise provided by law;  
18

19 (g). Such other and further relief as this Court may deem just and equitable.

20 Dated: January 3, 2021

Respectfully Submitted,

21 

22  
23  
24 Xiaohua Huang  
25 P.O. Box 1639, Los Gatos CA95031  
26 Tel: 669 273 5650  
27 Email: [paul\\_huang1010@outlook.com](mailto:paul_huang1010@outlook.com)  
28

Exhibit A US patent RE45259

Exhibit C US patent No. 6999331

Exhibit M Guo Declaration

Exhibit N Sun Declaration

Exhibit R Huang declaration of sharing TCAM design with Cisco

Exhibit E Data sheet of TCAM

Exhibit G The accused devices uses TCAM

#### CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was mailed to the Clerk of the Court and will be filed with the Court's CM/ECF system which will provide notice on all counsel deemed to have consented to electronic service. Defendant and All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing document by mail and email on this day.

Dated: January 3, 2021

By /S/ Xiaohua Huang