

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Paradise IP LLC,

Plaintiff,

v.

Kingsoft Office Software, Inc.,

Defendant.

Case No.

Patent Case

Jury Trial Demanded

COMPLAINT FOR PATENT INFRINGEMENT

1. Plaintiff Paradise IP LLC (“Plaintiff”), through its attorneys, complains of Kingsoft Office Software, Inc. (“Defendant”), and alleges the following:

PARTIES

2. Plaintiff Paradise IP LLC is a corporation organized and existing under the laws of Delaware that maintains its principal place of business at 2108 Dallas Pkwy, Ste 214 - 1025, Plano, TX 75093-4362.

3. Defendant Kingsoft Office Software, Inc. is a corporation organized and existing under the laws of Delaware that maintains an established place of business at 530 Lytton Ave. 2nd Floor Palo Alto, CA 94301.

JURISDICTION

4. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

5. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendant because it has engaged in systematic and continuous business activities in this District and is incorporated in this District's state. As described below, Defendant has committed acts of patent infringement giving rise to this action within this District.

VENUE

7. Venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant has an established place of business in this District. In addition, Defendant has committed acts of patent infringement in this District, and Plaintiff has suffered harm in this district.

PATENTS-IN-SUIT

8. Plaintiff is the assignee of all right, title and interest in United States Patent Nos. 6,253,217; 7,086,000; 7,200,613; and 7,791,741 (the "Patents-in-Suit"); including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the Patents-in-Suit. Accordingly, Plaintiff possesses the exclusive right and standing to prosecute the present action for infringement of the Patents-in-Suit by Defendant.

THE '217 PATENT

9. The '217 Patent is entitled "Active properties for dynamic document management system configuration," and issued 2001-06-26. The application leading to the '217 Patent was filed on 1998-08-31. A true and correct copy of the '217 Patent is attached hereto as Exhibit 1 and incorporated herein by reference.

THE '000 PATENT

10. The '000 Patent is entitled "Tagging related files in a document management system," and issued 2006-08-01. The application leading to the '000 Patent was filed on 2003-05-14. A true and correct copy of the '000 Patent is attached hereto as Exhibit 2 and incorporated herein by reference.

THE '613 PATENT

11. The '613 Patent is entitled "Asset management system for network-based and non-network-based assets and information," and issued 2007-04-03. The application leading to the '613 Patent was filed on 2002-11-04. A true and correct copy of the '613 Patent is attached hereto as Exhibit 3 and incorporated herein by reference.

THE '741 PATENT

12. The '741 Patent is entitled "On-the-fly state synchronization in a distributed system," and issued 2010-09-07. The application leading to the '741 Patent was filed on 2005-04-08. A true and correct copy of the '741 Patent is attached hereto as Exhibit 4 and incorporated herein by reference.

COUNT 1: INFRINGEMENT OF THE '217 PATENT

13. Plaintiff incorporates the above paragraphs herein by reference.

14. **Direct Infringement.** Defendant has been and continues to directly infringe one or more claims of the '217 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringe at least the exemplary claims of the '217 Patent also identified in the charts incorporated into this Count below (the "Exemplary '217 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the '217 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

15. Defendant also has and continues to directly infringe, literally or under the doctrine of equivalents, the Exemplary '217 Patent Claims, by having its employees internally test and use these Exemplary Products.

16. Exhibit 5 includes charts comparing the Exemplary '217 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '217 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '217 Patent Claims.

17. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 10.

18. Plaintiff is entitled to recover damages adequate to compensate for Defendants infringement.

COUNT 2: INFRINGEMENT OF THE '000 PATENT

19. Plaintiff incorporates the above paragraphs herein by reference.

20. **Direct Infringement.** Defendant has been and continues to directly infringe one or more claims of the '000 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringe at least the exemplary claims of the '000 Patent also identified in the charts incorporated into this Count below (the "Exemplary '000 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the '000 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

21. Defendant also has and continues to directly infringe, literally or under the doctrine of equivalents, the Exemplary '000 Patent Claims, by having its employees internally test and use these Exemplary Products.

22. Exhibit 6 includes charts comparing the Exemplary '000 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '000 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '000 Patent Claims.

23. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 12.

24. Plaintiff is entitled to recover damages adequate to compensate for Defendants infringement.

COUNT 3: INFRINGEMENT OF THE '613 PATENT

25. Plaintiff incorporates the above paragraphs herein by reference.

26. **Direct Infringement.** Defendant has been and continues to directly infringe one or more claims of the '613 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringe at least the exemplary claims of the '613 Patent also identified in the charts incorporated into this Count below (the "Exemplary '613 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the '613 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

27. Defendant also has and continues to directly infringe, literally or under the doctrine of equivalents, the Exemplary '613 Patent Claims, by having its employees internally test and use these Exemplary Products.

28. Exhibit 7 includes charts comparing the Exemplary '613 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '613 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '613 Patent Claims.

29. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 14.

30. Plaintiff is entitled to recover damages adequate to compensate for Defendants infringement.

COUNT 4: INFRINGEMENT OF THE '741 PATENT

31. Plaintiff incorporates the above paragraphs herein by reference.

32. **Direct Infringement.** Defendant has been and continues to directly infringe one or more claims of the '741 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringe at least the exemplary claims of the '741 Patent also identified in the charts incorporated into this Count below (the "Exemplary '741 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the '741 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

33. Defendant also has and continues to directly infringe, literally or under the doctrine of equivalents, the Exemplary '741 Patent Claims, by having its employees internally test and use these Exemplary Products.

34. Exhibit 8 includes charts comparing the Exemplary '741 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '741 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '741 Patent Claims.

35. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 16.

36. Plaintiff is entitled to recover damages adequate to compensate for Defendants infringement.

JURY DEMAND

37. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following relief:

- A. A judgment that the '217 Patent is valid and enforceable
- B. A judgment that Defendant has infringed directly one or more claims of the '217 Patent;
- C. A judgment that the '000 Patent is valid and enforceable
- D. A judgment that Defendant has infringed directly one or more claims of the '000 Patent;
- E. A judgment that the '613 Patent is valid and enforceable

- F. A judgment that Defendant has infringed directly one or more claims of the '613 Patent;
- G. A judgment that the '741 Patent is valid and enforceable
- H. A judgment that Defendant has infringed directly one or more claims of the '741 Patent;
- I. An accounting of all damages not presented at trial;
- J. A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284 for Defendants past infringement of the Patents-in-Suit.
- K. And, if necessary, to adequately compensate Plaintiff for Defendant's infringement, an accounting:
 - i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and that Plaintiff be awarded its reasonable attorneys fees against Defendant that it incurs in prosecuting this action;
 - ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this action; and
 - iii. that Plaintiff be awarded such further relief at law or in equity as the Court deems just and proper.

Respectfully submitted,

GAWTHROP GREENWOOD, PC

/s/ David deBruin

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Dated: January 29, 2021

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