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15 *Attorneys for Plaintiff*
16 *Westwind IP LLC*

17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

19 **WESTWIND IP LLC,**

20 Plaintiff,

21 v.

22 **ADATA TECHNOLOGY (U.S.A.)**
23 **CO., LTD.,**

24 Defendant.

25 **Civil Action No.**

26 **ORIGINAL COMPLAINT**

27 **JURY TRIAL DEMANDED**

1 9. Plaintiff repeats and realleges the allegations of paragraphs 1 through 9
2 as if fully set forth herein.

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4 10. Defendant, without authority from Plaintiff, made, had made, used,
5 imported, provided, supplied, distributed, sold, and/or offered for sale
6 semiconductor integrated circuits including the Adata 1TB SU800 SATA SSD,
7 Adata 1TB SX8200 NVMe SSD, and Adata S102 Pro USB (the “Accused
8 Products”) which directly infringe the ’924 Patent under 35 U.S.C. § 271(a).

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11 11. The Accused Products infringe at least claim 12 of the ’924 Patent.

12 12. For example, the Accused Products infringe claim 12 of the ’924 Patent.
13 They are semiconductor circuit systems in which a first semiconductor device (e.g.,
14 Adata 1TB TLC ONFI NAND Flash memory) and a second semiconductor device
15 (e.g., Silicon Motion SM3268P USB controller) which can access a storage included
16 in said first semiconductor device are mounted on a single printed wiring board,
17 wherein said storage includes a volatile memory (e.g., registers) and a nonvolatile
18 memory (e.g., NAND Flash cell), said first semiconductor device further comprises:
19 a plurality of first input terminals (e.g., CE0#, CE1# etc.) for receiving a plurality of
20 control signals; and a plurality of second input terminals for receiving a plurality of
21 address signals (e.g., DQ0, DQ1 etc.), each of a first command (e.g., Set Features)
22 for controlling said volatile memory and a second command (e.g., Page Program)
23 for controlling said nonvolatile memory is specified by signals supplied to said
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1 plurality of first input terminals and one or more signals supplied to one or more of
2 said plurality of second input terminals, and a code (e.g., CE*=0, CLE=1, ALE=0,
3 RE*=1 on rising edge of WE*) of said plurality of control signals is common to said
4 first command (e.g., Set Features) and said second command (e.g., Page Program),
5 and said one or more signals supplied to one or more of said plurality of second input
6 terminals for said first command (e.g., Set Features) and that for said second
7 command are different from each other (e.g., Page Program). *See* Ex. A-1 at Figs.
8 1-12.
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12 13. Plaintiff has been damaged as a result of the infringing conduct by
13 Defendant alleged above. Thus, Defendant is liable to Plaintiff in an amount that
14 adequately compensates Plaintiff for such infringements, which, by law, cannot be
15 less than a reasonable royalty, together with interest and costs as fixed by this Court
16 under 35 U.S.C. § 284.
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19 14. Plaintiff and/or its predecessors-in-interest have satisfied all statutory
20 obligations required to collect pre-filing damages for the full period allowed by law.
21

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiff respectfully requests:

24 A. that judgment be entered that Defendant has infringed at least
25 one or more claims of the '924 Patent, directly and/or indirectly, literally
26 and/or under the doctrine of equivalents;
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1 B. an award of damages sufficient to compensate Plaintiff for
2 Defendant's infringement under 35 U.S.C. § 284, including an
3 enhancement of damages on account of Defendant's willful infringement;
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5 C. that the case be found exceptional under 35 U.S.C. § 285 and that
6 Plaintiff be awarded its reasonable attorneys' fees;
7

8 D. costs and expenses in this action;

9 E. an award of prejudgment and post-judgment interest; and
10

11 F. such other and further relief as the Court may deem just and
12 proper.
13

14 **DEMAND FOR JURY TRIAL**

15 Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff
16 respectfully demands a trial by jury on all issues triable by jury.
17

18 DATED January 30, 2021.

Respectfully submitted,

19 /s/ Steven W. Ritcheson, Esq.
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