IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VIKING TECHNOLOGIES, LLC, Plaintiff, v. ENCORE REPAIR SERVICES, LLC, and ENCORE REPAIR HOLDINGS, LLC, Defendants.	C.A. No. 1:20-cv-01510-CFC **JURY TRIAL DEMANDED**

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Viking Technologies, LLC ("Viking") hereby asserts the following claims for patent infringement of United States Patent Numbers 8,888,953 (the "'953 Patent") and 10,220,537 (the "'537 Patent" and collectively with the '953 Patent, the "Patents-in-Suit") against defendants Encore Repair Services, LLC ("Encore Services") and Encore Repair Holdings, LLC ("Encore Holdings" and collectively with Encore Services, "Defendants"), and alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq*., seeking damages and other relief under 35 U.S.C. § 281, *et seq*.

PARTIES

2. Viking is a limited liability company organized and existing under the laws of the State of Nevada with its principal place of business at 103 South Valley Common, Madison, Mississippi 39110.

3. On information and belief, Encore Repair Services, LLC is a corporation organized and existing under the laws of Delaware with its principal place of business at 105 Prairie Lake

Road, Unit D, East Dundee, Illinois 60118. Encore Repair Services may be served with process through its registered agent, Corporation Service Company, 251 Little Falls Drive, Wilmington, Delaware 19808.

4. On information and belief, Encore Repair Holdings, LLC is a corporation organized and existing under the laws of Delaware with its principal place of business at 105 Prairie Lake Road, Unit D, East Dundee, Illinois 60118. Encore Repair Holdings may be served with process through its registered agent, Corporation Service Company, 251 Little Falls Drive, Wilmington, Delaware 19808.

JURISDICTION AND VENUE

5. This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 of the United States Code.

6. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because the action concerns the infringement of U.S. patents.

7. On information and belief, Defendants are subject to this Court's specific and general personal jurisdiction because they conduct substantial business in the District of Delaware, directly and/or through intermediaries, including: (i) committing at least a portion of the acts of infringement alleged herein in this District, and (ii) regularly conducting or soliciting business in this District, engaging in other persistent courses of conduct in this District including maintaining continuous and systematic contacts in this District, availing themselves of the privileges of doing business in this District.

8. Venue is proper in this District under 28 U.S.C. § 1400(b) because Defendants are Delaware corporations and therefore reside in this District.

BACKGROUND

9. The most vulnerable portion of a smart phone or tablet is the protective transparent cover which is typically made of hardened glass. The underlying display of a smart phone or tablet which is protected by this transparent cover is one of the most expensive components in the device. In the initial years after the advent of the iPhone and Android smartphones, the repair for a display assembly with broken glass cover would involve replacement of the entire display assembly.

10. The introduction of active-matrix organic light-emitting diode ("AMOLED") displays in smart phones and tablets in 2011 offered better display technology but at a significantly increased price. This made replacing the entire display assembly when the glass cover broke prohibitively expensive. After the introduction of AMOLED displays, Assurant, Inc. ("Assurant") approached business partners Kevin Barnett and Teo Chong Teck and asked them to develop a way to repair the glass cover in the touchscreen assembly of smartphones and tablets in order to avoid replacing the entire display assembly.

11. Messrs. Barnett and Teck designed a cutting machine and a method of using the machine to separate the glass cover from the underlying display without damaging the underlying display. The machine uses a cutting wire in the adhesive layer between the protective layer and the underlying display. The machine permits the height of the cutting wire to be adjusted to bring the cutting wire close to the underlying display and through the adhesive layer as the cutting wire traverses an area with broken glass. Because shards of broken glass often extend into the intermediate adhesive layer between the glass cover and the underlying display, this prevents the cutting wire from snagging those glass shards in the adhesive layer and damaging the underlying display. Using their technique, the broken glass cover is removed from the display assembly and a replacement touchscreen assembly is manufactured using the recovered underlying display and

a new protective glass cover. This is a more efficient and, therefore, more cost-effective approach to fixing a display assembly with a broken glass cover than replacing the entire display assembly.

12. In 2012 Messrs. Barnett and Teck formed Viking Technologies Company Limited in Hong Kong ("Viking Hong Kong") and opened a factory in China that, using the patented technology, removed the broken glass covers from approximately 10,000 devices a month.

13. In late 2013, Assurant terminated its relationship with Viking Hong Kong. Viking Hong Kong continued to process broken display assemblies for other customers from 2014 until 2016, but not at the consistent volume it had previously done for Assurant, and eventually ceased operating.

14. Today, broken glass covers are the most common insurance claim and warranty claim for smartphones and tablets and almost 30 million broken display assemblies are replaced every year, resulting in a $3.4 billion annual market. (https://www.prnewswire.com/news-releases/mobile-myths-cost-consumers-dearly-as-americans-report-spending-3-4-billion-replacing-millions-of-smartphone-screens-last-year-300753419.html, last accessed Jan. 28, 2021.) Defendants' infringement of the Patents-in-Suit has allowed them to capture a large share of this replacement market.

PATENTS-IN-SUIT

Background

15. The '953 Patent is entitled "Method and Apparatus for Display Screen Shield Replacement" and was duly issued by the U.S. Patent and Trademark Office on November 8, 2014. Viking is the owner by assignment of the '953 Patent. It is valid and enforceable, and was duly issued in full compliance with the Patent Laws of the United States, Title 35 of the United States Code. A true and correct copy of the '953 Patent is attached hereto as Exhibit 1.

16. Viking owns all substantial right, title, and interest in the '953 Patent, and holds the right to sue and recover damages for infringement thereof, including past infringement.

17. The '537 Patent is entitled "Method and Apparatus for Display Screen Shield Replacement" and was duly issued by the U.S. Patent and Trademark Office on March 5, 2019. Viking is the owner by assignment of the '537 Patent. It is valid and enforceable, and was duly issued in full compliance with the Patent Laws of the United States, Title 35 of the United States Code. A true and correct copy of the '537 Patent is attached hereto as Exhibit 2.

18. Viking owns all substantial right, title, and interest in the '537 Patent, and holds the right to sue and recover damages for infringement thereof, including past infringement.

19. The Patents-in-Suit describe and claim a particular way of using a cutting device, such as a cutting wire, to remove the protective glass cover from a display assembly without damaging the underlying display, such that the display assembly can be remanufactured using a new protective glass cover.

20. The claims of the Patents-in-Suit are not directed to abstract ideas and are not merely attempting to limit a method of organizing human activity or an idea itself to a particular technological environment. The claimed technology (e.g., a method of removing a protective glass cover from a display unit having a glass cover, an electronic display portion, and an intermediate adhesive layer therebetween) are expressly directed to methods of using cutting devices, which are not abstract methods or abstract ideas. The method of using a cutting device claimed in the Patents-in-Suit exists only in a concrete and tangible form, and the claimed inventions cannot be accomplished through pen-and-paper or the human mind. As alleged above, the claimed methods provided a technical solution to an existing technical problem. Accordingly, the claims of the Patents-in-Suit are not directed to an abstract idea.

21. When viewed as a whole, the claims, including as an ordered combination, are not merely a recitation of well-understood, routine, or conventional technologies or components. The claimed inventions were not well-known, routine, or conventional at the time of the invention and represent specific improvements over the prior art and existing systems and methods. The claimed technology (e.g., a method of removing a protective glass cover from a display unit having a glass cover, an electronic display portion, and an intermediate adhesive layer therebetween) was not known in the prior art at the time of the invention, let alone well-known, routine, or conventional.

22. Claim 1 of the ’953 Patent recites:

> A method of removing a protective glass top surface from a display unit having a glass top, an electronic display portion, and an intermediate layer therebetween, the display unit defining an axis extending along said intermediate layer, the method comprising the steps of: fixing the display unit in a carriage with the intermediate layer being exposed on all sides; aligning a cutting device in a coplanar relationship with the intermediate layer; biasing the cutting device in the intermediate layer adjacent the electronic display portion and away from the glass, driving the cutting device into the intermediate layer while moving the cutting device and display unit relative to each other along a diagonal direction relative to said display unit axis; advancing the cutting device into the intermediate layer to separate the glass top from the electronic display portion.

23. Claim 8 of the ’953 Patent recites:

> A method of separating a protective glass top surface from a display unit having a glass top, an electronic display portion, and an intermediate layer therebetween, the method comprising the steps of: fixing the display unit in a carriage with the intermediate layer being exposed on all sides; aligning a cutting blade in a coplanar relationship with the intermediate layer; biasing the cutting blade in the intermediate layer immediately adjacent the electronic display portion and away from the glass by locating the guide path of the blade below the display; heating a side of the cutting blade facing away from said electronic display portion, and cooling a side of the cutting blade facing toward said electronic display portion; driving the cutting blade into the intermediate layer so that the cutting blade and display unit are moved relative to each other along an axis generally orthogonal to the cutting blade; advancing the cutting blade into the intermediate layer to separate the glass top from the electronic display portion.

24. Claim 1 of the ’537 Patent recites:

A method of removing a protective glass top surface from a display unit having a glass top, an electronic display portion, and a planar intermediate layer therebetween, the method comprising the steps of: fixing the display unit in a carriage with the intermediate layer being exposed on all sides; aligning a cutting device in a coplanar relationship with the intermediate layer; biasing the cutting device in the intermediate layer adjacent the electronic display portion and away from the glass; driving the cutting device into the intermediate layer while moving the cutting device and display unit relative to each other along an axis generally orthogonal to the cutting device; and advancing the cutting device into the intermediate layer to separate the glass top from the electronic display portion.

25. Claim 9 of the ’537 Patent recites:

A method of separating a protective glass top surface from a display unit having a glass top, an electronic display portion, and a planar intermediate layer therebetween, method comprising the steps of: fixing the display unit in a carriage with the intermediate layer being exposed on all sides; aligning a cutting wire in a coplanar relationship with the intermediate layer; biasing the cutting wire in the intermediate layer immediately adjacent the electronic display portion and away from the glass by locating the guide path of the wire below the display; driving the cutting wire into the intermediate layer while moving it reciprocally therethrough so that the cutting device and display unit are moved relative to each other along an axis generally orthogonal to the cutting wire; and advancing the cutting wire into the intermediate layer to separate the glass top from the electronic display portion.

COUNT I
(INFRINGEMENT OF THE ’953 PATENT)

26. Viking repeats and re-alleges the allegations of Paragraphs 1–25 above as if fully set forth herein.

27. On information and belief, Defendants have infringed and continue to infringe one or more claims of the ’953 Patent, including but not limited to Claims 1 and 8, pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by using the patented methods of the ’953 Patent in the United States without authority to remove broken glass covers from display assemblies. Defendants operate phone repair and remanufacture facilities where they practice the patented method of the ’953 Patent to remove the glass cover from the underlying display as part of the remanufacturing process for display assemblies for smartphones and tablets.

28. On information and belief, Defendants have infringed and continue to infringe one or more claims of the ’953 Patent, including but not limited to Claims 1 and 8, pursuant to 35 U.S.C. § 271(g), by selling in, offering to sell in, using in, or importing into the United States display assemblies manufactured or otherwise produced using a process that practices at least one claimed method of the ’953 Patent. Defendants sell, offer to sell, use and/or import display assemblies that are remanufactured, either in the United States or abroad, using the patented method of the ’953 Patent, including by providing remanufactured display assemblies for smartphones and tablets at their mobile device repair facilities throughout the United States, and by mail-in service.

29. As just one non-limiting example, Defendants infringe claim 1 of the ’953 Patent by removing the glass cover from the underlying display as part of the remanufacturing process for display assemblies for smartphones and tablets at their phone repair and remanufacture facilities. Defendants use a cutting wire as the cutting device and, using a sawing action (typically either in a reciprocating or continuous unidirectional fashion), use the cutting device to slice through the optically transparent adhesive layer (“the intermediate layer”) between the protective glass cover/top and the underlying display to separate the protective glass cover from the display assembly.

30. Claim 1 of the ’953 Patent requires “fixing the display unit in a carriage with the intermediate layer being exposed on all sides.” As part of Defendants’ accused processes, the display assembly is secured (“fixed”) in a fixture (“carriage”) by, for example, securing the display assembly in a clamping mechanism or by securing the display assembly in place on a flat surface using a vacuum and therefore allows the optically transparent adhesive layer (“the intermediate

layer") between the protective glass cover and the display to remain exposed so the cutting device can enter, pass completely through, and exit the adhesive layer.

31. Claim 1 of the '953 Patent also requires "aligning a cutting device in a coplanar relationship with the intermediate layer." As part of Defendants' accused processes, the optically transparent adhesive layer ("the intermediate layer") of the secured display assembly and the cutting device are aligned in the same plane ("coplanar") so that the cutting device can slice through the optically transparent adhesive layer ("the intermediate layer") between the glass and the display.

32. Claim 1 of the '953 Patent further requires "biasing the cutting device in the intermediate layer adjacent the electronic display portion and away from the glass." As part of Defendants' accused processes, as the cutting device slices through the optically transparent adhesive layer ("the intermediate layer"), the cutting device is biased towards the display (and away from the protective glass cover) at least where the cutting device encounters obstacles such as broken glass and/or hardened adhesive. The biasing of the cutting device is accomplished by adjusting the height of the cutting device relative to the display and the protective glass cover, the adjustment being made through the operational aspects of the cutting machine or manually by the operator manipulating or otherwise influencing the cutting device height. Through visual confirmation and the response characteristics of the adhesive layer, the operator can determine when broken glass and other obstacles are encountered.

33. Claim 1 of the '953 Patent also requires "driving the cutting device into the intermediate layer while moving the cutting device and display unit relative to each other along a diagonal direction relative to said display unit axis." Defendants' accused processes begin with the cutting device being guided into the optically transparent adhesive layer ("the intermediate

layer"). To cut through the adhesive layer, the cutting device is typically used like a saw, either in a reciprocating fashion (e.g., with the back and forth motion typical of a handsaw) or unidirectionally (e.g., with the continuous movement typical of a bandsaw). The cutting device may be driven into the optically transparent adhesive layer ("the intermediate layer") on a diagonal relative to an axis of the display assembly extending along the adhesive layer (*see, e.g.,* '953 Patent, Fig. 7—showing X axis and Y axis). This is accomplished by setting the display assembly on a diagonal relative to the cutting device or by operator manipulation of the cutting device, such as a flexible wire, to establish at least a portion of the cutting device at a diagonal relative to an axis of the display assembly.

34. Claim 1 of the '953 Patent also requires "advancing the cutting device into the intermediate layer to separate the glass top from the electronic display portion." As part of Defendants' accused processes, the cutting device is advanced through the optically transparent adhesive layer ("the intermediate layer") to separate the protective glass cover and the display by moving the cutting device and the display assembly relative to each other.

35. One of ordinary skill in the art would understand that the above-described method is the most common method of performing high volume remanufacture of display assemblies for, as examples, Samsung smartphone/tablet (e.g, Galaxy S7, Galaxy S8, Galaxy S9, Galaxy S10, Galaxy Note 7, Galaxy Note 8, Galaxy Note 9, Galaxy Note 10) display assemblies and Apple smartphone/tablet (e.g, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X, iPhone XS, iPhone XR, iPad, iPad Mini) display assemblies. Not only does a remanufactured display assembly provide a significant cost benefit over procurement of a new replacement display assembly, but the above-described method also provides a significant cost benefit over other known methods of remanufacture. For example, as noted during prosecution, prior methods of

remanufacture were not effective in removing broken glass, thereby jeopardizing recovery of a working display, and effectively increasing the cost of display assembly remanufacturer when using those methods. *See* '953 Patent File History, September 4, 2014 Amendment and Response under 37 CFR § 1.111, pp. 8–9 ("In brief, though, prior to the inventions described in this application, the practice of removing damaged cover glass from a laminated face, often including a touch-sensitive LCD display unit, from handheld devices such as `smartphones' and 'tablets', has suffered from deficiencies in their inability to remove the glass when it is shattered. Shards of that cover glass, when it is shattered, often extend into the intermediate layer between the cover glass and the display, preventing prior machines and their associated methods from successfully removing the cover glass, and also jeopardizing the display.").

36. Defendants have directly infringed the '953 Patent and are thus liable for infringement of the '953 Patent pursuant to 35 U.S.C. § 271. Viking has suffered, and continues to suffer, damage because of Defendants' unlawful infringement of the '953 Patent. Viking is entitled to recover from Defendants the damages adequate to compensate for such infringement, which have yet to be determined.

COUNT II
(INFRINGEMENT OF THE '537 PATENT)

37. Viking repeats and re-alleges the allegations of Paragraphs 1–25 above as if fully set forth herein.

38. On information and belief, Defendants have infringed and continue to infringe one or more claims of the '537 Patent, including but not limited to Claims 1 and 9, pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by using the patented methods of the '537 Patent in the United States without authority to remove broken glass covers from

display assemblies. Defendants operate phone repair and remanufacture facilities where they practice the patented method of the '537 Patent to remove the glass cover from the underlying display as part of the remanufacturing process for display assemblies for smartphones and tablets.

39. On information and belief, Defendants have infringed and continue to infringe one or more claims of the '537 Patent, including but not limited to Claims 1 and 9, pursuant to 35 U.S.C. § 271(g), by selling in, offering to sell in, using in, or importing into the United States display assemblies manufactured or otherwise produced using a process that practices at least one claimed method of the '537 Patent. Defendants sell, offer to sell, use and/or import display assemblies that are remanufactured, either in the United States or abroad, using the patented method of the '537 Patent, including by providing remanufactured display assemblies for smartphones and tablets at their mobile device repair facilities throughout the United States, and by mail-in service.

40. As just one non-limiting example, Defendants infringe claim 1 of the '537 Patent by removing the glass cover from the underlying display as part of the remanufacturing process for display assemblies for smartphones and tablets at their phone repair and remanufacture facilities. Defendants use a cutting wire as the cutting device at their phone repair and remanufacture facilities. Using a sawing action (typically either in a reciprocating or continuous unidirectional fashion), Defendants use the cutting device to slice through the optically transparent adhesive layer ("the intermediate layer") between the protective glass cover/top and the underlying display to separate the protective glass cover from the display assembly.

41. Claim 1 of the '537 Patent requires "fixing the display unit in a carriage with the intermediate layer being exposed on all sides." As part of Defendants' accused processes, the display assembly is secured ("fixed") in a fixture ("carriage") by, for example, securing the display

assembly in a clamping mechanism or by securing the display assembly in place on a flat surface using a vacuum and therefore allows the optically transparent adhesive layer ("the intermediate layer") between the protective glass cover and the display to remain exposed so the cutting device can enter, pass completely through, and exit the adhesive layer.

42. Claim 1 of the '537 Patent also requires "aligning a cutting device in a coplanar relationship with the intermediate layer." As part of Defendants' accused processes, the optically transparent adhesive layer ("the intermediate layer") of the secured display assembly and the cutting device are aligned in the same plane ("coplanar") to allow the cutting device to slice through the optically transparent adhesive layer ("the intermediate layer") between the glass and the display.

43. Claim 1 of the '537 Patent further requires "biasing the cutting device in the intermediate layer adjacent the electronic display portion and away from the glass." As part of the accused processes, as the cutting device slices through the optically transparent adhesive layer ("the intermediate layer"), the cutting device is biased towards the display (and away from the protective glass cover) at least where the cutting device encounters obstacles such as broken glass and/or hardened adhesive. The biasing of the cutting device is accomplished by adjusting the height of the cutting device relative to the display and the protective glass cover, the adjustment being made through the operational aspects of the cutting machine or manually by the operator manipulating or otherwise influencing the cutting device height. Through visual confirmation and the response characteristics of the adhesive layer, the operator can determine when broken glass and other obstacles are encountered.

44. Claim 1 of the '537 Patent requires "driving the cutting device into the intermediate layer while moving the cutting device and display unit relative to each other along an axis generally

orthogonal to the cutting device." In Defendants' accused processes, the cutting device is guided into the optically transparent adhesive layer ("the intermediate layer"). To cut through the adhesive layer, the cutting device is used like a saw, either in a reciprocating fashion (e.g., with the back and forth motion typical of a handsaw) or unidirectionally (e.g., with the continuous movement typical of a bandsaw). The cutting device is driven into the optically transparent adhesive layer ("the intermediate layer") and advanced through the adhesive layer by moving the cutting device and the display assembly relative to each other such that, under operator control, the movement of the centerline of the cutting wire is generally at a right angle ("orthogonal") relative to the display assembly.

45. Claim 1 of the '537 Patent also requires "advancing the cutting device into the intermediate layer to separate the glass top from the electronic display portion." As part of Defendants' accused processes, the cutting device is advanced through the optically transparent adhesive layer ("the intermediate layer") to separate the protective glass cover and the display by moving the cutting device and the display assembly relative to each other.

46. One of ordinary skill in the art would understand that the above-described method is the most common method of performing high volume remanufacture of display assemblies for, as examples, Samsung smartphone/tablet (e.g, Galaxy S7, Galaxy S8, Galaxy S9, Galaxy S10, Galaxy Note 7, Galaxy Note 8, Galaxy Note 9, Galaxy Note 10) display assemblies and Apple smartphone/tablet (e.g, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X, iPhone XS, iPhone XR, iPad, iPad Mini) display assemblies. Not only does a remanufactured display assembly provide a significant cost benefit over procurement of new replacement display assemblies, but the above-described method also provides a significant cost benefit over other known methods of remanufacture. For example, as noted during prosecution, prior methods of

remanufacture were not effective in removing broken glass, thereby jeopardizing recovery of a working display which effectively increased the cost of display assembly replacement. *See* '537 Patent File History, February 9, 2015 Amendment and Response under 37 CFR § 1.111, pg. 9 ("In brief, prior to the inventions described in this application, the practice of removing damaged cover glass from a laminated face, often including a touch-sensitive LCD display unit, from handheld devices such as `smartphones' and 'tablets', has suffered from deficiencies in their inability to remove the glass when it is shattered. Shards of that cover glass, when it is shattered, often extend into the intermediate layer between the cover glass and the display, preventing prior machines and their associated methods from successfully removing the cover glass, and also jeopardizing the display. *In response to at least these deficiencies, the inventor herein devised methods and machines which bias the cutting device toward the display and thus away from the (likely broken) glass, which has real and greatly advantageous effects on the efficacy of the separation process*.") (emphasis added).

47. Defendants have directly infringed the '537 Patent and are thus liable for infringement of the '537 Patent pursuant to 35 U.S.C. § 271. Viking has suffered, and continues to suffer, damage because of Defendants unlawful infringement of the '537 Patent. Viking is entitled to recover from Defendants the damages adequate to compensate for such infringement, which have yet to be determined.

PRAYER FOR RELIEF

WHEREFORE, Viking respectfully requests that this Court enter judgment in its favor as follows:

a. holding that Defendants have directly infringed literally and/or under the doctrine of equivalents, one or more claims of the Patents-in-Suit;

b. holding that Viking is entitled to pre-suit damages consistent with, *e.g.*, 35 U.S.C. § 287;

c. awarding Viking the damages to which it is entitled under 35 U.S.C. § 284 for Defendants' past infringement, including a reasonable royalty and lost profits;

d. awarding Viking costs and expenses in this action;

e. awarding Viking pre- and post-judgment interest on its damages;

f. enjoining Defendants from further infringement of the Patents-in-Suit; and

g. awarding Viking such other and further relief in law or in equity as this Court deems just and proper.

JURY DEMAND

Viking, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any and all issues so triable by right.

Dated: February 8, 2021

BAYARD, P.A.

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