

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

**CREEKVIEW IP LLC,**

Plaintiff,

v.

**CORSAIR GAMING, INC.,**

Defendant.

**Civil Action No.**

**ORIGINAL COMPLAINT**

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff Creekview LLC (“Creekview” or “Plaintiff”) files this original complaint against Corsair Gaming, Inc., (“Corsair” or “Defendant”), for infringement of U.S. Patent No. 9,608,472 (“the ’472 Patent”) and alleges as follows:

**PARTIES**

1. Creekview is a limited liability company formed under the laws of the State of Texas, with a principal place of business at 815 Brazos Street, Suite 500, Austin, TX 78701.

2. Upon information and belief, Defendant is a domestic corporation formed under the laws of the State of Delaware with a principal place of business at 47100 Bayside Parkway, Fremont, CA 94538. Defendant may be served through its registered agent: Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808.

**JURISDICTION AND VENUE**

3. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has general personal jurisdiction over Defendant because Defendant is incorporated under the laws of the State of Delaware.

5. Venue is proper in this District under 28 U.S.C. § 1400(b). Defendant resides within this District because Defendant was incorporated under the laws of the State of Delaware.

**U.S. PATENT NO. 9,608,472**

6. U.S. Patent No. 9,608,472, titled “METHOD AND APPARATUS FOR WIRELESSLY TRANSFERRING POWER AND COMMUNICATING WITH ONE OR MORE SLAVE DEVICES,” teaches a system for charging devices that includes a master device and a slave device. The slave device includes (1) an antenna to receive a radio frequency (RF) beam and (2) a power generation module connected to the antenna that converts RF energy received by the slave antenna to power. The master device includes (1) a directional antenna to direct RF power to the antenna of the slave device and (2) a module that provides power to the directional antenna of the master device. *See* the ’472 Patent, attached hereto as Exhibit A.

7. On March 28, 2017, the ’472 Patent was duly issued by the United States Patent and Trademark Office.

8. Creekview is the current assignee of the ’472 Patent with all substantive rights in and to the ’472 Patent, including the sole and exclusive right to prosecute this action and enforce the ’472 Patent against infringers, and to collect damages for all relevant times.

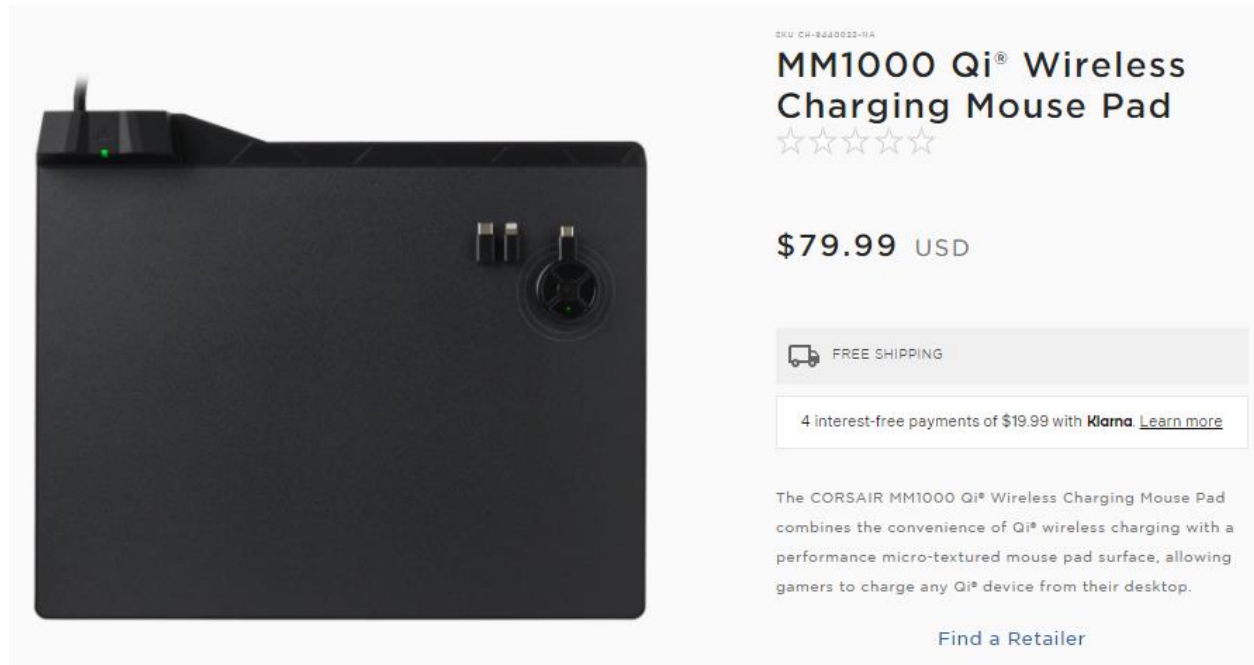
9. Creekview has satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the ’472 Patent.

10. Creekview has complied with any applicable marking and/or notice provisions of 35 U.S.C. § 287 with respect to the ’472 Patent.

**THE ACCUSED PRODUCT**

11. Defendant makes, uses, sells, and/or offers for sale the MM1000 Qi® Wireless Charging Mouse Pad (the “Accused Product”).

12. The Accused Product “combines the convenience of Qi® wireless charging with a performance micro-textured mouse pad surface, allowing gamers to charge any Qi device from their desktop.” See <https://www.youtube.com/watch?v=ogibHGD-hE4>.



<https://www.corsair.com/us/en/Categories/Products/Gaming-Mousepads/Wireless-Charging-Mousepads/MM1000-Qi%C2%AE-Wireless-Charging-Mouse-Pad/p/CH-9440022-NA>

**COUNT I – DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,608,472**

13. Defendant and its end-user customers, in violation of 35 U.S.C. § 271(a), have directly infringed, literally or under the doctrine of equivalents, and continue to infringe the ’472 Patent by using the Accused Product in its customary intended manner with compatible Qi devices.

14. Specifically, Defendant and its end-user customers have directly infringed method claim 19 of the '472 Patent by using the Accused Product, at least in the manner of testing with compatible Qi devices within the United States. For example, Defendant practiced every element of method claim 19 at least when the Accused Product was tested by Defendant and further when placed into its intended operation to charge Qi compatible devices by Defendant's customers. *See Exemplary Infringement Chart*, attached as Exhibit B.

15. As shown in the Exemplary Infringement Chart of Exhibit B, at least when tested by Defendant and when used by Defendant's customers, the Accused Product operates in conjunction with Qi compatible devices which practice a method for use by a slave device (*e.g.*, the device to be charged) for generating power from energy wirelessly received from a master device (*e.g.*, the Accused Product), the method comprising: transmitting a slave device identification (*e.g.*, identification of the device to be charged) to the master device (*e.g.*, the Accused Product) for determining authorization to wirelessly receive energy (*e.g.*, wireless power transfer) from the master device (*e.g.*, the Accused Product); wirelessly receiving, in response to transmitting the slave device identification (*e.g.*, identification of the device to be charged) to the master device (*e.g.*, the Accused Product), energy from the master device (*e.g.*, the Accused Product); and generating power from the wireless energy (*e.g.*, wireless power transfer) received from the master device (*e.g.*, the Accused Product) for use by a set of electronic circuitry of the slave device (*e.g.*, the device to be charged). As illustrated, the Accused Product follows the Qi-Standard. The device to be charged acts as a power receiver and the Accused Product acts as a power transmitter. The power receiver sends an identification to power transmitter for identification and verification. The power receiver receives an ACK response for successful

verification and NAK response for unsuccessful verification. The power transmitter transfers power after successful verification. *See* Ex. B.

16. Creekview has been damaged by the infringing conduct by Defendant in an amount to be determined at trial. Thus, Defendant is liable to Creekview in an amount that adequately compensates Creekview for such infringement, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

**COUNT II – INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,608,472**

17. Defendant, in violation of 35 U.S.C. § 271(b), has indirectly infringed, literally or under the doctrine of equivalents, method claim 19 of the '472 Patent as outlined by actively inducing their customers to practice the method of claim 19 via use of the Accused Product in an infringing manner to charge Qi compatible devices.

18. Defendant has had knowledge and notice of the '472 Patent and the infringement by the Accused Product since at least the filing of this complaint.

19. Despite such notice, Defendant has continued to provide the Accused Product to its customers and, on information and belief, posted downloadable guides on how to use the Accused Product in an infringing manner. *See* MM1000 Quick Start Guide PDF, attached as Exhibit C. Therefore, Defendant has knowingly and intentionally encouraged and aided at least its end-user customers to directly infringe the '472 Patent.

20. Defendant's end-user customers directly infringe claim 19 of the '472 Patent by using the Accused Product in conjunction with Qi compatible devices in their intended manner to infringe. Defendant induces such infringement by providing the Accused Product and downloadable instructional guides to enable and facilitate infringement, while knowing of, or being willfully blind to the existence of the '472 Patent.

21. On information and belief, Defendant specifically intends that its actions will result in infringement of the '472 Patent, or subjectively believe that their actions will result in infringement of the '472 Patent. Therefore, Defendant's induced infringement of the '472 Patent is exceptional and entitles Creekview to recover attorney fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

22. Creekview is entitled to recover from Defendant all damages that Creekview has sustained as a result of Defendant's infringement of the Asserted Patent, including, without limitation, a reasonable royalty to be determined at trial.

**PRAYER FOR RELIEF**

WHEREFORE, Creekview respectfully requests:

- A. That judgment be entered that Defendant has infringed at least claim 19 of the '472 Patent, directly and/or indirectly, literally and/or under the doctrine of equivalents;
- B. An award of damages sufficient to compensate Creekview for Defendant's infringement under 35 U.S.C. § 284, including an enhancement of damages on account of Defendant's willful infringement;
- C. That the case be found exceptional under 35 U.S.C. § 285 and that Creekview be awarded its reasonable attorney fees;
- D. Costs and expenses in this action;
- E. An award of prejudgment and post-judgment interest; and
- F. Such other and further relief as the Court may deem just and proper.

**DEMAND FOR JURY TRIAL**

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

DATED: November 30, 2021

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*ATTORNEYS FOR PLAINTIFF  
CREEKVIEW IP LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of November, 2021, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court for the District of Delaware, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Jimmy Chong  
Jimmy Chong (#4839)