

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

CREEKVIEW IP LLC,

Plaintiff,

v.

LOGITECH, INC.,

Defendant.

Civil Action No. 3:21-CV-5866

COMPLAINT FOR PATENT
INFRINGEMENT

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Creekview IP LLC (“Creekview” or “Plaintiff”) files this original complaint against Logitech, Inc., (“Logitech” 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 California with a principal place of business

1 at 7700 Gateway Boulevard, Newark, CA 94560. Defendant is registered to
2 conduct business in the State of Washington and may be served through its
3 registered agent: CT Corporation System, 711 Capitol Way South, Suite 204,
4 Olympia, WA 98501.
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7 **JURISDICTION AND VENUE**

8 3. This is an action for infringement of a United States patent arising
9 under 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject
10 matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).
11

12 4. This Court has specific personal jurisdiction over Defendant because
13 Defendant has engaged in substantial business activities within this District, and
14 has committed and/or induced specific acts of patent infringement here, thereby
15 giving rise to this action. Specifically, Defendant makes, uses, sells, and/or offers
16 for sale infringing products within this District. Upon information and belief,
17 Defendant uses and/or sells infringing products at their office located within this
18 District.
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22 5. Venue is proper in this District under 28 U.S.C. § 1400(b) because
23 Defendant has committed acts of patent infringement in this District and has a
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1 regular and established place of business in this District at 4700 NW Camas
2 Meadows Drive, Camas, WA 98607.
3

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

5
6 6. U.S. Patent No. 9,608,472, titled “METHOD AND APPARATUS
7 FOR WIRELESSLY TRANSFERRING POWER AND COMMUNICATING
8 WITH ONE OR MORE SLAVE DEVICES,” teaches a system for charging
9 devices that includes a master device and a slave device. The slave device includes
10 (1) an antenna to receive a radio frequency (RF) beam and (2) a power generation
11 module connected to the antenna that converts RF energy received by the slave
12 antenna to power. The master device includes (1) a directional antenna to direct RF
13 power to the antenna of the slave device and (2) a module that provides power to
14 the directional antenna of the master device. *See* the ’472 Patent, attached hereto as
15 Exhibit A.
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19

20 7. On March 28, 2017, the ’472 Patent was duly issued by the United
21 States Patent and Trademark Office.
22

23 8. Creekview is the current assignee of the ’472 Patent with all
24 substantive rights in and to the ’472 Patent, including the sole and exclusive right
25
26

1 to prosecute this action and enforce the '472 Patent against infringers, and to
2 collect damages for all relevant times.

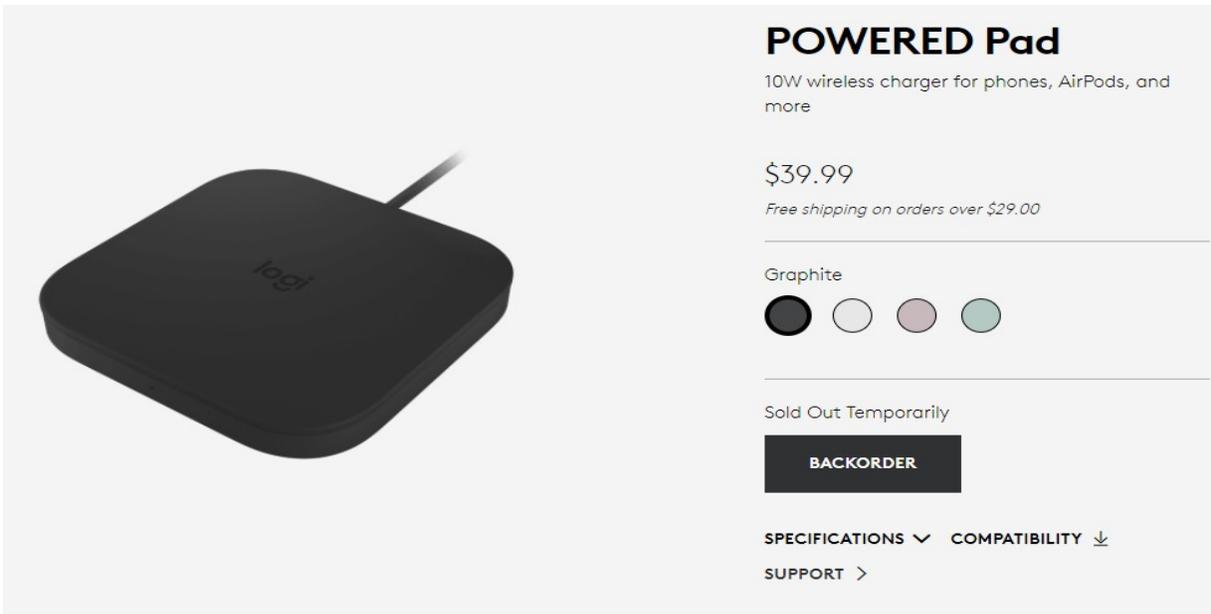
3
4 9. Creekview has satisfied all statutory obligations required to collect
5 pre-filing damages for the full period allowed by law for infringement of the '472
6 Patent.

7
8 10. Creekview has complied with any applicable marking and/or notice
9 provisions of 35 U.S.C. § 287 with respect to the '472 Patent.

10
11 **THE ACCUSED PRODUCT**

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13 11. Defendant makes, uses, sells, and/or offers for sale the POWERED
14 Pad (the "Accused Product").

15
16 12. With the Accused Product "Enjoy safe, reliable wireless charging with
17 POWERED Pad. Leave charging cables behind and step up to a charger that fits
18 effortlessly into your life and daily routine. Get ready for the smoothest wireless
19 charging solution you've ever experienced." See [https://www.youtube.com/watch?
20 v=O2FloIJI_0M&t=1s](https://www.youtube.com/watch?v=O2FloIJI_0M&t=1s).



(<https://www.logitech.com/en-us/products/chargers/powered-wireless-charging-pad.950-000060.html#buy-powered-wireless-charging-pad>)

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

1 least in the manner of testing with compatible Qi devices within the United States.
2 For example, Defendant practiced every element of method claim 19 at least when
3 the Accused Product was tested by Defendant and further when placed into its
4 intended operation to charge Qi compatible devices by Defendant's customers. *See*
5 Exemplary Infringement Chart, attached as Exhibit B.
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8 15. As shown in the Exemplary Infringement Chart of Exhibit B, at least
9 when tested by Defendant and when used by Defendant's customers, the Accused
10 Product operates in conjunction with Qi compatible devices which practice a
11 method for use by a slave device (*e.g.*, the device to be charged) for generating
12 power from energy wirelessly received from a master device (*e.g.*, the Accused
13 Product), the method comprising: transmitting a slave device identification (*e.g.*,
14 identification of the device to be charged) to the master device (*e.g.*, the Accused
15 Product) for determining authorization to wirelessly receive energy (*e.g.*, wireless
16 power transfer) from the master device (*e.g.*, the Accused Product); wirelessly
17 receiving, in response to transmitting the slave device identification (*e.g.*,
18 identification of the device to be charged) to the master device (*e.g.*, the Accused
19 Product), energy from the master device (*e.g.*, the Accused Product); and
20 generating power from the wireless energy (*e.g.*, wireless power transfer) received
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1 from the master device (*e.g.*, the Accused Product) for use by a set of electronic
2 circuitry of the slave device (*e.g.*, the device to be charged). As illustrated, the
3
4 Accused Product follows the Qi-Standard. The device to be charged acts as a
5 power receiver and the Accused Product acts as a power transmitter. The power
6
7 receiver sends an identification to power transmitter for identification and
8 verification. The power receiver receives an ACK response for successful
9 verification and NAK response for unsuccessful verification. The power transmitter
10
11 transfers power after successful verification. *See* Ex. B.

12
13 16. Creekview has been damaged by the infringing conduct by Defendant
14 in an amount to be determined at trial. Thus, Defendant is liable to Creekview in an
15 amount that adequately compensates Creekview for such infringement, which, by
16
17 law, cannot be less than a reasonable royalty, together with interest and costs as
18 fixed by this Court under 35 U.S.C. § 284.

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

21 17. Defendant, in violation of 35 U.S.C. § 271(b), has indirectly infringed,
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23 literally or under the doctrine of equivalents, method claim 19 of the '472 Patent as
24 outlined by actively inducing their customers to practice the method of claim 19

1 via use of the Accused Product in an infringing manner to charge Qi compatible
2 devices.

3
4 18. Defendant has had knowledge and notice of the '472 Patent and the
5 infringement by the Accused Product since at least the filing of this complaint.
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7 19. Despite such notice, Defendant has continued to provide the Accused
8 Product to its customers and, on information and belief, posted articles on how to
9 use the Accused Product in an infringing manner. *See*
10 <https://support.logi.com/hc/en-us/articles/360044286474-Getting-Started->
11 [POWERED-Pad](#). Therefore, Defendant has knowingly and intentionally

12 encouraged and aided at least its end-user customers to directly infringe the '472
13 Patent.
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17 20. Defendant's end-user customers directly infringe claim 19 of the '472
18 Patent by using the Accused Product in conjunction with Qi compatible devices in
19 their intended manner to infringe. Defendant induces such infringement by
20 providing the Accused Product and downloadable instructional guides to enable
21 and facilitate infringement, while knowing of, or being willfully blind to the
22 existence of the '472 Patent.
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1 Creekview be awarded its reasonable attorney fees;

2 D. Costs and expenses in this action;

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4 E. An award of prejudgment and post-judgment interest; and

5 F. Such other and further relief as the Court may deem just and proper.

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7 **DEMAND FOR JURY TRIAL**

8 Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Creekview
9 respectfully demands a trial by jury on all issues triable by jury.
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11
12 DATED: November 30, 2021

13
14 OF COUNSEL:

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16 submitted)
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22 *CREEKVIEW IP LLC*