

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

FUTURE LINK SYSTEMS, LLC,

Plaintiff,

v.

AMLOGIC HOLDINGS, LTD.; AMLOGIC  
(CA) CO. INC.,

Defendants.

C.A. No.

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT  
AGAINST AMLOGIC HOLDINGS, LTD. AND AMLOGIC (CA) CO. INC.**

This is an action for patent infringement arising under the Patent Laws of the United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Future Link Systems, LLC (“Plaintiff” or “Future Link”) makes the following allegations against Defendants Amlogic Holdings, Ltd. and Amlogic (CA) Co. Inc. (collectively, “Defendants” or “Amlogic”):

**INTRODUCTION**

1. This complaint arises from Amlogic’s unlawful infringement of the following United States patents owned by Plaintiff, which generally relate to integrated circuits and power-saving features therefor: United States Patent Nos. 7,685,439 (“’439 Patent”) and 8,099,614 (“’614 Patent”) (collectively, the “Asserted Patents”).

**PARTIES**

2. Plaintiff Future Link Systems, LLC is a Delaware limited liability company organized and existing under the law of the State of Delaware, with its principal place of business at 3945 Freedom Circle, Suite 900, Santa Clara, California 95054. Future Link is the sole owner by assignment of all right, title, and interest in each Asserted Patent.

3. On information and belief, Defendant Amlogic Holdings Ltd. is a Cayman Islands company, and is registered as a domestic corporation in Delaware.

4. On information and belief, Defendant Amlogic (CA) Co. Inc. is a company organized under the laws of the state of California with a principal place of business at 2518 Mission College Blvd., Suite 120, Santa Clara, CA 95054. Amlogic (CA) Co. Inc. is a wholly owned subsidiary of Amlogic Holdings, Ltd.

### **JURISDICTION AND VENUE**

5. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendants in this action at least because of Amlogic Holdings Ltd.'s domestication in Delaware. *See Acorda Therapeutics, Inc. v. Mylan Pharms. Inc.*, 78 F. Supp. 3d 572, 584 (D. Del. 2015), *aff'd* 817 F.3d 755 (3d Cir. 2016) ("One manner in which a corporation may be deemed to have consented to the jurisdiction of the courts in a particular state is by complying with the requirements imposed by that state for registering or qualifying to do business there."). Defendants have also committed acts within this District giving rise to this action and have established minimum contacts with this forum such that the exercise of jurisdiction over Defendants would not offend traditional notions of fair play and substantial justice. Defendants, directly and through subsidiaries or intermediaries, have committed and continues to commit acts of infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the Asserted Patents.

7. Venue is proper in this District under 28 U.S.C. §§ 1391(b)–(d) and 1400(b). At least Amlogic Holdings Ltd.'s domestication in Delaware renders Amlogic Holdings Ltd. a

resident of Delaware. Furthermore, upon information and belief, Defendants have transacted business in this District and have committed acts of direct and indirect infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the Asserted Patent. Venue is also proper as to a foreign defendant in any district. *In re HTC Corp.*, 889 F.3d 1349, 1354–61 (Fed. Cir. 2018). Thus, because Amlogic Holdings Ltd. is a Cayman Islands company, venue is proper.

### **FACTUAL ALLEGATIONS**

8. On August 15, 2019, Future Link sent a notice letter to Amlogic asserting the infringement of Future Link patents, including the '439 and '614 Patents.

9. On September 18, 2019, Future Link sent a follow-up letter to Amlogic requesting a response to the infringement contentions outlined in the August 15, 2019 notice letter.

10. On September 23, 2019, Amlogic requested additional information from Future Link, including charts specifying Amlogic's infringement in more detail.

11. On October 28, 2019, Future Link provided Amlogic with claim charts detailing Amlogic's infringement of Future Link patents.

12. On December 10, 2019, Future Link presented Amlogic with a licensing proposal. Future Link continued to discuss its proposal with Amlogic through June 9, 2020.

13. Despite these efforts, the parties failed to reach an agreement that would adequately compensate Future Link for Amlogic's ongoing infringement. Thus, Future Link was left with no recourse but to file this lawsuit to protect its valuable assets.

**COUNT I**

**INFRINGEMENT OF U.S. PATENT NO. 7,685,439**

14. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

15. Plaintiff owns by assignment all rights, title, and interest in U.S. Patent No. 7,685,439 (the “’439 Patent”), entitled “Method for Effecting the Controlled Shutdown of Data Processing Units.” The ’439 Patent was duly and legally issued by the United States Patent and Trademark Office on March 23, 2010. A true and correct copy of the ’439 Patent is attached as Exhibit 1.

16. On information and belief, Amlogic makes, uses, offers for sale, sells, and/or imports certain products (“Accused Products”), such as System-on-Chip devices, that directly infringe, literally and/or under the doctrine of equivalents, at least Claim 1 of the ’439 Patent.

17. Amlogic also knowingly and intentionally induces infringement of at least Claim 1 of the ’439 Patent in violation of 35 U.S.C. § 271(b). Through at least previous correspondence between Future Link and Amlogic (including a notice letter Future Link sent to Amlogic identifying Amlogic’s infringement of the ’439 Patent) and the filing and service of this Complaint, Amlogic has had knowledge of the ’439 Patent and the infringing nature of the Accused Products. Despite this knowledge of the ’439 Patent, Amlogic continues to actively encourage and instruct its customers and end users (for example, through user manuals and online instruction materials on its website) to use the Accused Products in ways that directly infringe the ’439 Patent. Amlogic does so knowing and intending that its customers and end users will commit these infringing acts. Amlogic also continues to make, use, offer for sale, sell, and/or import the Accused Products, despite its knowledge of the ’439 Patent, thereby specifically intending for and inducing its

customers to infringe the '439 Patent through the customers' normal and customary use of the Accused Products.

18. Amlogic has also infringed, and continues to infringe, at least Claim 1 of the '439 Patent by selling, offering for sale, or importing into the United States, the Accused Products, knowing that the Accused Products constitute a material part of the inventions claimed in the '439 Patent, are especially made or adapted to infringe the '439 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use. Amlogic has been, and currently is, contributorily infringing the '439 Patent in violation of 35 U.S.C. §§ 271(c) and (f).

19. The Accused Products satisfy all claim limitations of one or more claims of the '439 Patent. A claim chart comparing independent claim 1 of the '439 Patent to representative Accused Products (including but not limited to the Amlogic S905) is attached as Exhibit 2, which is hereby incorporated by reference in its entirety.

20. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Amlogic has injured Plaintiff and is liable for infringement of the '439 Patent pursuant to 35 U.S.C. § 271.

21. As a result of Amlogic's infringement of the '439 Patent, Plaintiff is entitled to monetary damages in an amount adequate to compensate for Amlogic's infringement, but in no event less than a reasonable royalty for the use made of the invention by Amlogic, together with interest and costs as fixed by the Court.

22. Amlogic also had knowledge of or has been willfully blind to its infringement of the '439 Patent, and based on that knowledge or willful blindness, it has willfully infringed the '439 Patent.

23. Amlogic also had actual or constructive knowledge of Future Link's rights in the '439 Patent due to, for example, Future Link's communications with Amlogic as detailed in the Factual Allegations.

24. Amlogic's infringing activities have injured and will continue to injure Plaintiff, unless and until this Court enters an injunction prohibiting further infringement of the '439 Patent, and, specifically, enjoining further manufacture, use, sale, importation, and/or offers for sale that come within the scope of the patent claims.

## **COUNT II**

### **INFRINGEMENT OF U.S. PATENT NO. 8,099,614**

25. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

26. Plaintiff owns by assignment all rights, title, and interest in U.S. Patent No. 8,099,614 (the "'614 Patent"), entitled "Power Management for Buses in CMOS Circuits." The '614 Patent was duly and legally issued by the United States Patent and Trademark Office on January 17, 2012. A true and correct copy of the '614 Patent is attached as Exhibit 3.

27. On information and belief, Amlogic makes, uses, offers for sale, sells, and/or imports certain products ("Accused Products"), such as System-on-Chip devices, that directly infringe, literally and/or under the doctrine of equivalents, at least Claim 1 of the '614 Patent.

28. Amlogic also knowingly and intentionally induces infringement of at least Claim 1 of the '614 Patent in violation of 35 U.S.C. § 271(b). Through at least previous correspondence between Future Link and Amlogic (including a notice letter Future Link sent to Amlogic identifying Amlogic's infringement of the '614 Patent) and the filing and service of this Complaint, Amlogic has had knowledge of the '614 Patent and the infringing nature of the Accused Products.

Despite this knowledge of the '614 Patent, Amlogic continues to actively encourage and instruct its customers and end users (for example, through user manuals and online instruction materials on its website) to use the Accused Products in ways that directly infringe the '614 Patent. Amlogic does so knowing and intending that its customers and end users will commit these infringing acts. Amlogic also continues to make, use, offer for sale, sell, and/or import the Accused Products, despite its knowledge of the '614 Patent, thereby specifically intending for and inducing its customers to infringe the '614 Patent through the customers' normal and customary use of the Accused Products.

29. Amlogic has also infringed, and continues to infringe, at least Claim 1 of the '614 Patent by selling, offering for sale, or importing into the United States, the Accused Products, knowing that the Accused Products constitute a material part of the inventions claimed in the '614 Patent, are especially made or adapted to infringe the '614 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use. Amlogic has been, and currently is, contributorily infringing the '614 Patent in violation of 35 U.S.C. §§ 271(c) and (f).

30. The Accused Products satisfy all claim limitations of one or more claims of the '614 Patent. A claim chart comparing independent claim 1 of the '614 Patent to representative Accused Products (including but not limited to the Amlogic S905) is attached as Exhibit 4, which is hereby incorporated by reference in its entirety.

31. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Amlogic has injured Plaintiff and is liable for infringement of the '614 Patent pursuant to 35 U.S.C. § 271.

32. As a result of Amlogic's infringement of the '614 Patent, Plaintiff is entitled to monetary damages in an amount adequate to compensate for Amlogic's infringement, but in no

event less than a reasonable royalty for the use made of the invention by Amlogic, together with interest and costs as fixed by the Court.

33. Amlogic also had knowledge of or has been willfully blind to its infringement of the '614 Patent, and based on that knowledge or willful blindness, it has willfully infringed the '614 Patent.

34. Amlogic also had actual or constructive knowledge of Future Link's rights in the '614 Patent due to, for example, Future Link's communications with Amlogic as detailed in the Factual Allegations.

35. Amlogic's infringing activities have injured and will continue to injure Plaintiff, unless and until this Court enters an injunction prohibiting further infringement of the '614 Patent, and, specifically, enjoining further manufacture, use, sale, importation, and/or offers for sale that come within the scope of the patent claims.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court enter:

- a. A judgment in favor of Plaintiff that Amlogic has infringed, either literally and/or under the doctrine of equivalents, the '439 and '614 Patents;
- b. A judgment and order requiring Amlogic to pay Plaintiff its damages, costs, expenses, and pre-judgment and post-judgment interest for Amlogic's infringement of the '439 and '614 Patents; and
- c. A judgment and order requiring Amlogic to provide an accounting and to pay supplemental damages to Plaintiff, including without limitation, pre-judgment and post-judgment interest;



- d. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Amlogic;
- e. An award of enhanced damages to Plaintiff as a result of Amlogic's willful infringement; and
- f. Any and all other relief as the Court may deem appropriate and just under the circumstances.

**DEMAND FOR JURY TRIAL**

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

Dated: December 22, 2021

Respectfully submitted,

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