

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<p><b>ROCK CREEK NETWORKS, LLC,</b></p> <p style="text-align: center;">Plaintiff</p> <p style="text-align: center;">v.</p> <p><b>BUFFALO AMERICAS, INC.,</b></p> <p style="text-align: center;">Defendant</p>	<p><b>Case No. 6:23-cv-00298</b></p> <p><b>JURY TRIAL DEMANDED</b></p> <p><b>NOTICE OF RELATED CASES</b></p>
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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Rock Creek Networks, LLC (“RCN”) files this Complaint against Buffalo Americas, Inc. (“Buffalo”) for infringement of RCN’s patent: U.S. Patent No. 6,671,750 (PX-750 attached). This case is related to:

6:21-cv-00675-ADA, *Rock Creek Networks, LLC v. Nvidia Corp.*

6:21-cv-00673-ADA, *Rock Creek Networks, LLC v. Senao Networks, Inc.*

6:21-cv-00290-ADA, *Rock Creek Networks, LLC v. Huawei Techs.*

6:21-cv-00256-ADA, *Rock Creek Networks, LLC v. Fujitsu Ltd.*

6:21-cv-00231-ADA, *Rock Creek Networks, LLC v. Via Techs., Inc.*

6:21-cv-00082-ADA, *Rock Creek Networks, LLC v. Caswell Inc.*

6:21-cv-00081-ADA, *Rock Creek Networks, LLC v. Realtek Semiconductor Corp.*

6:21-cv-00080-ADA, *Rock Creek Networks, LLC v. Zyxel Commc’ns Corp.*

6:21-cv-00068-ADA, *Rock Creek Networks, LLC v. D-Link Corp.*

### **THE PARTIES**

1. Plaintiff and patent owner RCN is a limited liability company formed under the laws of State of Texas.

2. Defendant Buffalo is a corporation organized under the laws of Texas with a place of business at 11130 Jollyville Road, Suite 205, Austin, Texas 78759. Buffalo may be served with process through its registered agent, CT Corporation System, 1999 Bryan St., Ste 900, Dallas, Texas 75201.

### **JURISDICTION AND VENUE**

3. This is a patent suit brought under the United States Patent Act, namely 35 U.S.C. §§ 271, 281, and 284-285, among other laws. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(b). Buffalo maintains an established place of business in this district and has committed acts of infringement in this district including selling, offering to sell, and distributing infringing products in the Western District of Texas.

### **THE ASSERTED PATENT**

5. Rock Creek Networks is the owner, by assignment, of U.S. Patent No. 6,671,750 (the “’750 Patent”), titled LAN INTERFACE, which issued on December 30, 2003. A copy of the ’750 Patent is attached hereto as Exhibit PX-750.

6. RCN possesses all rights of recovery under the Asserted Patents.

## **BUFFALO AMERICAS, INC.’S PRODUCTS**

7. Upon information and belief, Buffalo made, imported, sold, offered for sale, distributed, marketed, and/or used, during the term of the ’750 patent, infringing network switches such as Multi-Port Gigabit Smart Switches, Multi-Port Gigabit Switches, Multi-Port Gigabit PoE Smart Switches, Multi-port Gigabit PoE Switches, 10GbE Switches, Entry-Level Unmanaged 10GbE Network Switches (“the Accused Products”).

8. The Accused products conform with IEEE 802.3az Energy Efficient Ethernet (EEE). This mode saves energy by putting part of the transmission circuit into low power mode when a link is idle so that the Ethernet links use power only during data transmission. <https://www.buffalotech.com/products/gigabit-green-ethernet-smart-switches>

### **Multi-Port Gigabit Web Smart Switches**



## Summary

Buffalo's Gigabit Green Ethernet Smart Switches provide a host of comprehensive HTTP/HTTPS web-based network management features including VLAN, SNMP, port trunking/link aggregation, DHCP snooping, STP support and 802.1p QoS. Along with 802.3az Green Ethernet technology, the BS-GS Series includes an energy conservation feature that monitors the activity status of each port to reduce the total power consumed. Gigabit speeds, eco-minded operation, performance-minded features and a lifetime warranty make Buffalo's BS-GS Series of Gigabit Green Ethernet Smart Switches a perfect network extension solution for your office.

		<b>BS-GS Series</b> (BS-GS2008, BS-GS2016, BS-GS2024, BS-GS2048)		
<b>PRODUCT SPECIFICATIONS</b>				
<b>MODELS</b>	BS-GS2008	BS-GS2016	BS-GS2024	BS-GS2048
<b>INTERFACE SPECIFICATIONS</b>				
Standard Compliance	IEEE802.3 (10BASE-T), IEEE802.3u (100BASE-TX), IEEE802.3ab (1000BASE-T), IEEE802.1D Spanning Tree Protocol, IEEE802.1w Rapid Spanning Tree Protocol, IEEE802.1p Class of Service, Priority Protocol, IEEE802.1Q VLANs, IEEE802.3ad (LACP), IEEE802.3az, AUTO-MDIX			
Flow Control Connector	IEEE802.3x RJ-45 8-pin connector (shielded)			

[https://www.buffalotech.com/images/product\\_images/Smart\\_Switches\\_Datasheet.p](https://www.buffalotech.com/images/product_images/Smart_Switches_Datasheet.pdf)

[df](#)

**COUNT I**  
**INFRINGEMENT OF U.S. PATENT NO. 6,671,750**

9. Plaintiff realleges and incorporates by reference the allegations in the preceding paragraphs as if fully set forth herein.

10. The '750 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

11. Plaintiff is the owner by assignment of the '750 Patent.

12. The Accused Products were designed to connect to provide interactive services using applications.

13. Buffalo infringed one or more claims, including claims 1 and 6, of the '750 Patent during the term of the patent by making, using, importing, selling, and/or, offering for sale the Accused Products in the United States without authority or license in violation of 35 U.S.C. § 271.

14. Claim 6 of the '750 Patent recites:

6. A LAN interface comprising:

a LAN controller for processing a signal transmitted from a terminal connected to an I/O bus and then transmitting a processed signal to said counter device, and for processing a signal transmitted from said counter device and then transmitting a processed signal to said connection device;

a separator connected between said LAN controller and said I/O bus,

for electrically disconnecting said LAN controller from said I/O bus; and

a link pulse detector for operating on a predetermined voltage supplied via said I/O bus and detecting a link pulse from said counter device connected to said connection port;

wherein said link pulse detector, when detecting a link pulse output from the counter device, controls the LAN controller and the isolation section to controllably bring them to an operation state thereof and, when not detecting a link pulse output from the counter device, controls the LAN controller and the isolation section to controllably bring them to a non-operation state.

15. As exemplified above, the Buffalo Accused Products include a LAN interface that has LAN controller for processing a signal transmitted from a terminal connected to an I/O bus and then transmitting a processed signal to said counter device, and for processing a signal transmitted from said counter device and then transmitting a processed signal to said connection device.

16. The Buffalo Accused Products have a LAN interface that has a separator connected between said LAN controller and said I/O bus, for electrically disconnecting said LAN controller from said I/O bus.

17. The LAN interface includes a link pulse detector for operating on a

predetermined voltage supplied via said I/O bus and detecting a link pulse from said counter device connected to said connection port.

18. In operation, the link pulse detector, when detecting a link pulse output from the counter device, controls the LAN controller and the isolation section to controllably bring them to an operation state thereof and, when not detecting a link pulse output from the counter device, controls the LAN controller and the isolation section to controllably bring them to a non-operation state.

19. Buffalo's infringing activities were performed without authority or license under the '750 Patent.

20. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's infringing acts, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court, pursuant to 35 U.S.C. § 284.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests the Court enter judgment against Defendant:

1. declaring that Defendant infringed the '750 Patent;
2. awarding Plaintiff its damages suffered as a result of Defendant's infringement of the '750 Patent;

3. awarding Plaintiff its costs, attorneys' fees, expenses, and prejudgment and post-judgment interest; and
4. granting Plaintiff such further relief as the Court deems just and proper.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury of all issues so triable pursuant to Fed.

R. Civ. P. 38.

Dated: April 21, 2023

Respectfully Submitted,

By: /s/ Cabrach Connor

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