

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

HAVIS, INC.,

Defendant,

CASE NO.

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

Plaintiff National Products, Inc. (“NPI” or “Plaintiff”) brings this action against Defendant Havis, Inc. (“Havis” or “Defendant”) for an injunction, damages, and other appropriate relief to stop Havis from violating NPI’s patent rights. NPI states and alleges as follows:

**THE PARTIES**

1. NPI is a corporation organized and existing under the laws of the State of Washington, having its principal place of business at 8410 Dallas Ave S., Seattle, Washington 98108.

2. NPI is a market leader in the design, manufacture, and sale of innovative docking cradles and protective cover products, including docking cradles and protective covers for tablets, cellular phones, and other portable devices, which are used, for example, in cars, trucks, bikes, planes, boats and motorcycles.

3. Upon information and belief, Havis is a corporation organized and existing under the laws of the State of Pennsylvania having its principal place of business at 75 Jacksonville Rd., Warminster, PA, 18974, and having a regular and established

place of business in this judicial district at 14451 Ewing Ave, Burnsville, MN 55306.

4. Upon information and belief, Havis is in the business of providing docking systems, including the products that are at issue in this lawsuit. Upon information and belief, Havis advertises, markets, and sells its products, including the products that are the subject of the patent infringement alleged in this lawsuit, to the public throughout the United States, including within this judicial district.

### **NATURE OF THE ACTION**

5. This is a civil action for infringement of U.S. Patent Nos. 9,602,639 (“the ’639 patent”); 9,632,535 (“the ’535 patent”); 10,778,275 (“the ’275 patent”); and 11,165,458 (“the ’458 patent”), under the patent laws of the United States, including, without limitation, 35 U.S.C. § 1 *et seq.*

### **JURISDICTION AND VENUE**

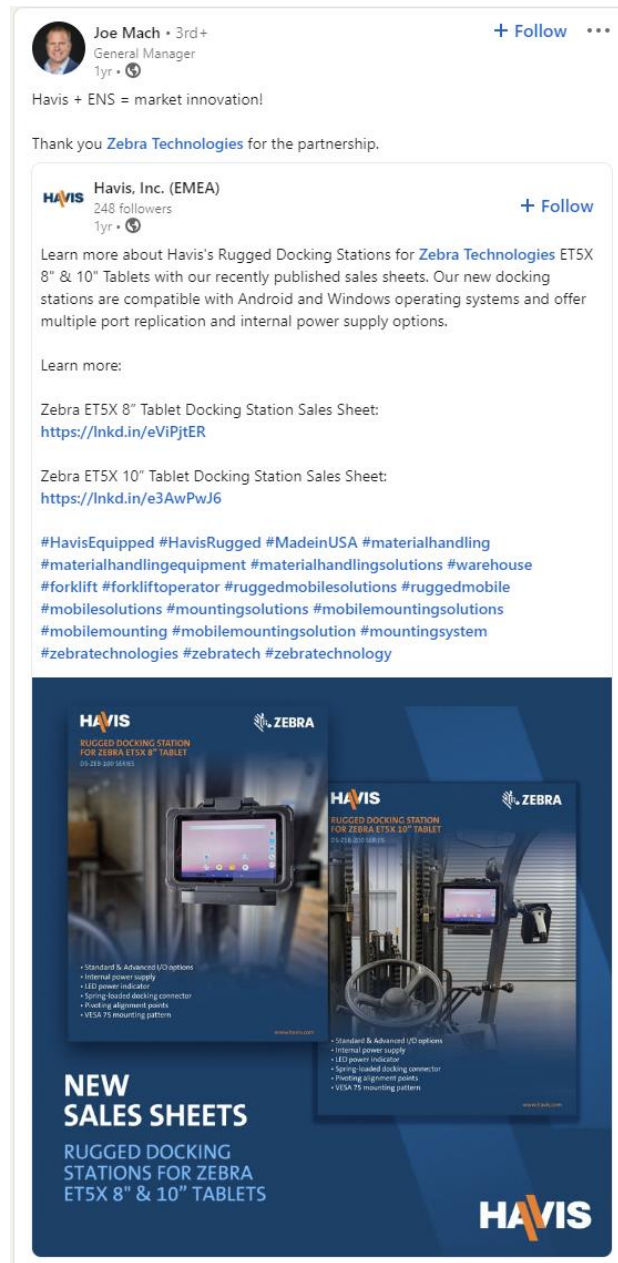
6. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

7. This Court has personal jurisdiction over Havis. Upon information and belief, Havis maintains a regular and established place of business in this judicial district. This Court also has personal jurisdiction over Havis because, upon information and belief, Havis has committed, aided, abetted, contributed to, and/or participated in the commission of patent infringement in this judicial district.

8. Upon information and belief, Havis sells and offers to sell its infringing products directly through its website to the public throughout the United States, including this judicial district.

9. Upon information and belief, numerous Havis employees having responsibilities related to the products identified of infringement herein live and conduct business on behalf of Havis within this judicial district. For example, Havis identifies a “Minneapolis Location” on its “Contact Us” page. See <https://www.havis.com/contact-us/>. The Minneapolis Location is a “Corporate Office & Product Development Center” at 14451 Ewing Ave, Burnsville, MN 55306.” *Id.* The Havis website describes the Burnsville, Minnesota location as a “Corporate Office, Product Development Center & Manufacturing Plant.” <https://www.havis.com/about-havis/our-people/>. The same webpage states that the Product Development Centers “utilize the latest 3D scanning and printing technology to design solutions that ensure critical technology is accessible, secure, and reliable.” *Id.* Havis also previously listed an opening for an on-site “Product Manager – Computing Solutions” in Burnsville, Minnesota. See [https://www.linkedin.com/jobs/view/product-manager-computing-solutions-at-havis-inc-3624321196/?utm\\_campaign=google\\_jobs\\_apply&utm\\_source=google\\_jobs\\_apply&utm\\_medium=organic](https://www.linkedin.com/jobs/view/product-manager-computing-solutions-at-havis-inc-3624321196/?utm_campaign=google_jobs_apply&utm_source=google_jobs_apply&utm_medium=organic). The first responsibility listed on the job post is “[l]ead Product Life Cycle Management activities for **Docking Stations**, Peripherals, Technology Packages . . . .” See [https://www.linkedin.com/jobs/view/product-manager-computing-solutions-at-havis-inc-3624321196/?utm\\_campaign=google\\_jobs\\_apply&utm\\_source=google\\_jobs\\_apply&utm\\_medium=organic](https://www.linkedin.com/jobs/view/product-manager-computing-solutions-at-havis-inc-3624321196/?utm_campaign=google_jobs_apply&utm_source=google_jobs_apply&utm_medium=organic) (emphasis added). Additionally, the LinkedIn profile of Mr. Joe Mach indicates that he holds the position of “General Manager” at Havis and that Mr. Mach resides and/or works in the “Greater Minneapolis-St. Paul Area.” See

<https://www.linkedin.com/in/joe-mach-2b55184/>. Mr. Mach has posted on LinkedIn about Havis tablet docking stations and a partnership with Zebra Technologies:



([https://www.linkedin.com/posts/joe-mach-2b55184\\_havisequipped-havisrugged-madeinusa-activity-6897281429986770947-BSID?utm\\_source=share&utm\\_medium=member\\_desktop](https://www.linkedin.com/posts/joe-mach-2b55184_havisequipped-havisrugged-madeinusa-activity-6897281429986770947-BSID?utm_source=share&utm_medium=member_desktop)).

Similarly, the LinkedIn profile of Mr. Ryan Herz indicates that he is a “Director of Operations” at Havis and that Mr. Herz resides and/or works in Prior Lake, Minnesota. *See* <https://www.linkedin.com/in/ryan-herz-018b88b/>. Further, the LinkedIn profile of Ms. Clare Bernhagen indicates that she is a “Accounting Specialist at Havis” and that Ms. Bernhagen resides and/or works in Burnsville, Minnesota. *See* <https://www.linkedin.com/in/clare-bernhagen-86120719/>. Further still, the LinkedIn profile of Mr. Cory Benson indicates that he is a “Senior Mechanical Design Engineer at Havis, Inc.” and that Mr. Benson resides and/or works in Minneapolis, Minnesota. *See* <https://www.linkedin.com/in/cory-benson-591b23279/>. Likewise, the LinkedIn profile of Mr. Jamie Brandt lists his position as “Industrial Design and New Product Development” at Havis in Burnsville, Minnesota. *See* <https://www.linkedin.com/in/jamiebrandt/>. Moreover, the LinkedIn profile of Jeremy Rau describes Mr. Rau as holding the role of “Senior Project Engineer at Havis, Inc” in Burnsville, Minnesota. *See* <https://www.linkedin.com/in/jeremy-rau-00a42655/>. Mr. William Claire likewise indicates he is a “Designer at Havis” in Burnsville, Minnesota. *See* <https://www.linkedin.com/in/william-claire-umn/>. Upon information and belief, Ms. Bernhagen and Messrs. Herz, Benson, Mach, Brandt, Rau, and Claire, along with other Havis personnel and employees, work or worked together in this judicial district, including in Havis’s regular and established place of business, to conduct Havis business.

10. Venue is proper in this judicial district under 28 U.S.C. §§ 1391 and 1400(b), because Havis has committed acts of infringement in this District, and upon information and belief, Havis has a regular and established place of business in this

District.

**THE '639 PATENT**

11. On March 21, 2017, the '639 patent, entitled "Docking Sleeve With Electrical Adapter" was duly and legally issued to Jeffrey D. Carnevali. The '639 patent is generally directed toward a protective cover and adapter for an accessory device, such as, for example, a cellular phone, phablet, tablet, handheld device, or the like.

12. NPI is the owner, by assignment, of all right, title, and interest in the '639 patent, including the rights to exclude others and to sue and recover damages for infringement.

13. To the extent any marking or notice was required by 35 U.S.C. § 287, NPI and/or all predecessors in interest and/or implied or express licensees of the '639 patent, if any, have complied with the marking requirements of 35 U.S.C. § 287 by fixing the word "patented" together with the address of NPI's website, which is accessible to the public without charge and which associates the patented article with the '639 patent in the "Patent and Trademarks" page of NPI's website, on all goods made, offered for sale, sold, and/or imported into the United States that embody one or more claims of the '639 patent.

14. A true and correct copy of the '639 patent is attached as **Exhibit A**.

**THE '535 PATENT**

15. On April 25, 2017, the '535 patent, entitled "Docking Sleeve With Electrical Adapter" was duly and legally issued to Jeffrey D. Carnevali, Chad Michael Remmers, and Aaron Michael Hersey. The '535 patent is generally directed toward a

protective cover for an accessory device, such as, for example, a cellular phone, phablet, laptop, handheld device, or the like.

16. NPI is the owner, by assignment, of all right, title, and interest in the '535 patent, including the rights to exclude others and to sue and recover damages for infringement.

17. To the extent any marking or notice was required by 35 U.S.C. § 287, NPI and/or all predecessors in interest and/or implied or express licensees of the '535 patent, if any, have complied with the marking requirements of 35 U.S.C. § 287 by fixing the word “patented” together with the address of NPI’s website, which is accessible to the public without charge and which associates the patented article with the '535 patent in the “Patent and Trademarks” page of NPI’s website, on all goods made, offered for sale, sold, and/or imported into the United States that embody one or more claims of the '535 patent.

18. A true and correct copy of the '535 patent is attached as **Exhibit B**.

#### **THE '275 PATENT**

19. On September 15, 2020, the '275 patent, entitled “Docking Sleeve With Electrical Adapter” was duly and legally issued to Jeffrey D. Carnevali. The '275 patent is generally directed toward a protective cover for an accessory device, such as, for example, a cellular phone, phablet, tablet, handheld device, or the like.

20. NPI is the owner, by assignment, of all right, title, and interest in the '275 patent, including the rights to exclude others and to sue and recover damages for infringement.

21. To the extent any marking or notice was required by 35 U.S.C. § 287, NPI and/or all predecessors in interest and/or implied or express licensees of the '275 patent, if any, have complied with the marking requirements of 35 U.S.C. § 287 by fixing the word “patented” together with the address of NPI’s website, which is accessible to the public without charge and which associates the patented article with the '275 patent in the “Patent and Trademarks” page of NPI’s website, on all goods made, offered for sale, sold, and/or imported into the United States that embody one or more claims of the '275 patent.

22. A true and correct copy of the '275 patent is attached as **Exhibit C**.

#### **THE '458 PATENT**

23. On November 2, 2021, the '458 patent, entitled “Docking Sleeve with Electrical Adapter” was duly and legally issued to Jeffrey D. Carnevali. The '458 patent is generally directed toward a protective cover for an accessory device, such as, for example, a cellular phone, phablet, tablet, handheld device, or the like.

24. NPI is the owner, by assignment, of all right, title, and interest in the '458 patent, including the rights to exclude others and to sue and recover damages for infringement.

25. To the extent any marking or notice was required by 35 U.S.C. § 287, NPI and/or all predecessors in interest and/or implied or express licensees of the '458 patent, if any, have complied with the marking requirements of 35 U.S.C. § 287 by fixing the word “patented” together with the address of NPI’s website, which is accessible to the public without charge and which associates the patented article with the '458 patent in the



“Patent and Trademarks” page of NPI’s website, on all goods made, offered for sale, sold, and/or imported into the United States that embody one or more claims of the ’458 patent.

26. A true and correct copy of the ’458 patent is attached as **Exhibit D**.

**COUNT I**  
**INFRINGEMENT OF UNITED STATES PATENT NO. 9,602,639**

27. NPI realleges and incorporates by reference the allegations in paragraphs 1–26 above.

28. Havis has directly infringed and continues to directly infringe at least claim 1 of the ’639 patent by using within the United States and/or importing into the United States powered docking systems for and used with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option, including but not limited to the Zebra Tablet Mounts.




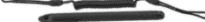

29. Inspection of the Zebra Tablet Mounts demonstrates that, when used with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option, they meet each and every element of claim 1 of the ’639 patent, either literally or by the doctrine of equivalents.

30. For example, Zebra’s website describes its ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option as designed for use with third-party docking systems, and depicts the products comprising the protective cover of claim 1:

## Accessory Ecosystem Overview



## Rugged Frames, D-Clips &amp; Tethers

8 in. & 10 in. Rugged Frames	D-Clips & Tethers
	
<b>SG-ET5X-8RCSE2-02</b> 8 in. Rugged Frame with Rugged I/O connector (Included)	<b>SG-ET5X-DCLIP2-02</b> 2 D-Clips attach to screw bosses in rugged frame
	
<b>SG-ET5X-10RCSE2-01</b> 10 in. Rugged Frame with Rugged I/O connector (Included)	<b>SG-TC7X-STYLUS-03</b> TC7X 3-Pack STYLUS + TETHER
<ul style="list-style-type: none"> <li>Improves drop protection to 6 ft (2m) to concrete</li> <li>Sealed I/O connector replaces bottom dust cover</li> <li>Screw bosses on back to attach hand and shoulder straps</li> <li>Works with or without Expansion Backs</li> </ul>	<ul style="list-style-type: none"> <li>TC7X passive stylus (no batteries needed, more durable)</li> <li>3-Pack + Tether (single stylus unit is not available)</li> <li><b>Note:</b> stylus will not work in areas where water is pooled on the screen</li> </ul>
	
	<b>SG-ET5X-SLTETR-01</b> Stylus coil tether
	<ul style="list-style-type: none"> <li>Coiled tether provides a convenient method to keep your tablet and pen together without compromising your usage experience</li> </ul>

ZEBRA TECHNOLOGIES

12

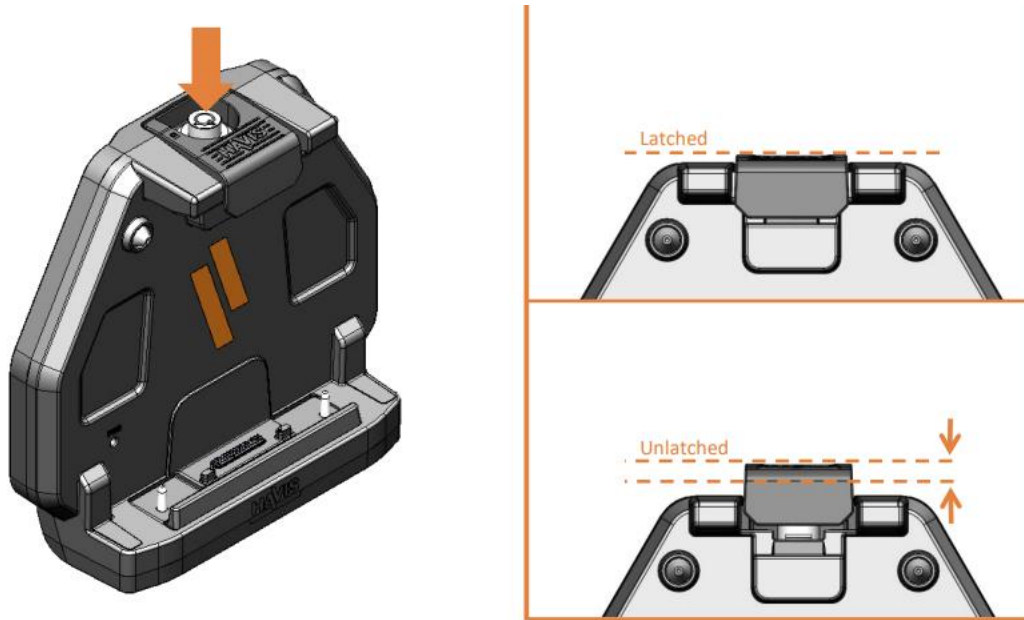
([https://www.zebra.com/content/dam/zebra\\_dam/en/guide/configuration-and-accessories/et51-et56-guide-accessory-en-us.pdf](https://www.zebra.com/content/dam/zebra_dam/en/guide/configuration-and-accessories/et51-et56-guide-accessory-en-us.pdf))

31. The protective cover for use with the Zebra Tablet Mount depicted above is exemplary. Each protective cover for use with the Zebra Tablet Mounts comprises a flexible protective shell, comprising a panel and a skirt surrounding the panel, wherein the panel and skirt form an interior cavity therebetween, and the skirt

forming a mouth opening that communicates with the interior cavity, wherein the interior cavity is configured and arranged to receive the Zebra tablet. Additionally, the shell is configured and arranged to cover the back face of the tablet, covers a plurality of side faces of the tablet, and extends around a peripheral edge of the front face of the tablet to secure the tablet within the shell. The protective cover further contains an adapter fixedly positioned in the shell, the adapter comprising a male plug comprising a plurality of connectors extending into the interior cavity of the shell in an arrangement for mating a female socket of the Zebra tablet, and a contactor comprising a plurality of contacts adjacent to an exterior of the shell and electrically coupled to one or more of the connectors of the plug.

32. Additionally, Havis's website depicts each Zebra Tablet Mount as comprising the docking cradle of claim 1:





([https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES\\_OMN\\_02-23.pdf](https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES_OMN_02-23.pdf))

33. The docking cradle for use with the Zebra Tablet Mount depicted above is exemplary. Each docking cradle for use with the Zebra Tablet Mounts is configured to receive the cover, a movable arm coupled to the tray, and a docking connector disposed opposite the movable arm and comprising a plurality of contacts positioned to connect with one or more of the plurality of contacts of the contactor, wherein the movable arm is configured and arranged for movement between an extended position with the movable arm extended away from the tray and a close position with the movable arm close to the tray.

34. Upon information and belief, Havis has induced and continues to induce infringement of one or more claims of the '639 patent, including but not limited to claim 1, by inducing its customers and other third parties to use without authorization the arrangements claimed in the '639 patent, including the Zebra Tablet Mounts in

conjunction with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option. The use, without authorization, of the Zebra Tablet Mounts in conjunction with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option constitutes infringement, literally or under the doctrine of equivalents, of one or more claims of the '639 patent by such customers or third parties. Havis's acts of inducement include: providing its customers with the Zebra Tablet Mounts and intending customers to use the Zebra Tablet Mounts in conjunction with the Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option; advertising these products and their intended use through its own and third-party websites (for example, [https://www.havis.com/product/devmt\\_dockst\\_zeb\\_et5x\\_10\\_in\\_stdnd-134017-0/](https://www.havis.com/product/devmt_dockst_zeb_et5x_10_in_stdnd-134017-0/)); offering technical support to its customers for these products (for example, <https://www.havis.com/support/>); and providing instructions on how to use these products (for example, [https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES\\_OMN\\_02-23.pdf](https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES_OMN_02-23.pdf)).

35. Additionally, upon information and belief, Havis infringes one or more claims of the '639 patent, including but not limited to claim 1, under 35 U.S.C. § 271(f)(1) by supplying, or causing to be supplied, in or from the United States all or a substantial portion of the components of the patented invention, where such components are uncombined in whole or in part, in such a manner as to actively induce the combination of such components—as described in the preceding paragraph—outside of the United States in a manner that would infringe the patent if such combination occurred within the United States.

36. Upon information and belief, Havis has contributed to and continues to contribute to the infringement of one or more claims of the '639 patent, including but not limited to claim 1, by, without authority, selling and/or offering to sell within the United States, importing, and/or supplying components of systems that comprise the patented invention, including but not limited to the Zebra Tablet Mounts. These components supplied by Havis are key components to the arrangements claimed in the '639 patent. When, for example, a Zebra ET50/51 and/or ET55/56 enterprise tablet with the rugged frame option is placed within a Zebra Tablet Mount, the claimed arrangements are formed, thereby infringing, either literally or under the doctrine of equivalents, one or more claims of the '639 patent. Upon information and belief, Havis supplied and continues to supply these components, including without limitation the Zebra Tablet Mounts, with knowledge of the '639 patent and with the knowledge that these components constitute material parts of the inventions claimed in the '639 patent. Further, Havis knows that these components are especially made and/or especially adapted for use as claimed in the '639 patent. Moreover, Havis knows that there is no substantial non-infringing use of these components.

37. Additionally, upon information and belief, Havis infringes one or more claims of the '639 patent, including but not limited to claim 1, under 35 U.S.C. § 271(f)(2) by supplying, or causing to be supplied, in or from the United States components of the patented invention that are especially made or especially adapted for use in the invention and not a staple article or commodity of commerce suitable for substantial noninfringing use—as described in the preceding paragraph—where such

component is uncombined in whole or in part, knowing that such component is so made or adapted and intending that such component will be combined outside of the United States in a manner that would infringe the patent if such combination occurred within the United States.

38. As a direct and proximate consequence of Havis's infringement of the '639 patent, NPI has suffered irreparable harm, and NPI will continue to suffer irreparable harm in the future unless Havis is enjoined from infringing the '639 patent.

39. Havis has had actual knowledge of the '639 patent and its infringement thereof since at least June 30, 2023, when NPI notified Havis that the manufacture, sale, offering for sale, importation, and/or use of the Zebra Tablet Mounts infringes the '639 patent. A true and correct copy of the NPI's notice letter is attached as **Exhibit E**.

40. Upon information and belief, Havis's continued infringement of the '639 patent is willful.

**COUNT II**  
**INFRINGEMENT OF UNITED STATES PATENT NO. 9,632,535**

41. NPI realleges and incorporates by reference the allegations in paragraphs 1–40 above.

42. Havis has directly infringed and continues to directly infringe at least claim 19 of the '535 patent by using within the United States and/or importing into the United States powered docking systems for and used with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option, including but not limited to the

## Zebra Tablet Mounts.

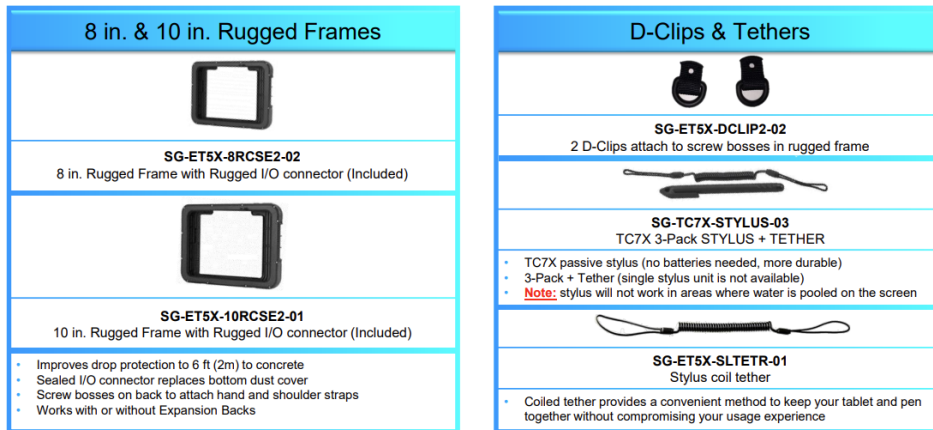
43. Inspection of the Zebra Tablet Mounts demonstrates that, when used with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option, they meet each and every element of claim 19 of the '535 patent, either literally or by the doctrine of equivalents.

44. For example, Zebra's website describes its ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option as designed for use with third-party docking systems, and depicts the products comprising the protective skin of claim 19:





## Rugged Frames, D-Clips & Tethers



ZEBRA TECHNOLOGIES

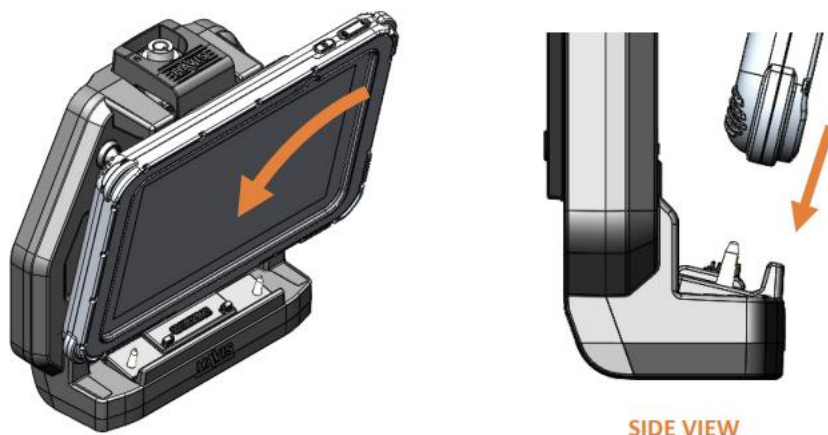
12

([https://www.zebra.com/content/dam/zebra\\_dam/en/guide/configuration-and-accessories/et51-et56-guide-accessory-en-us.pdf](https://www.zebra.com/content/dam/zebra_dam/en/guide/configuration-and-accessories/et51-et56-guide-accessory-en-us.pdf))

45. The protective skin for use with the Zebra Tablet Mount depicted above is exemplary. Each protective skin for use with the Zebra Tablet Mounts comprises a flexible protective shell, wherein the panel and skirt form an interior cavity of the shell, and the skirt forming a mouth opening that communicates with the interior cavity, wherein the interior cavity is configured and arranged to receive a tablet with a Zebra tablet with a portion of the shell at least partially covering a back surface and extending over a peripheral edge of a front surface of the electronic device to capture the Zebra tablet within the interior cavity of the shell. Each protective skin further contains an adapter fixedly positioned in the shell, the adapter comprising a male plug comprising a plurality of connectors extending into the interior cavity of the shell in an arrangement for mating with a female socket of the electronic device, a contactor comprising a plurality of contacts adjacent to an exterior of the shell and electrically coupled to one or

more of the connectors of the male plug, and a positioning interface disposed on the shell and defining a rim around the contactor of the adapter to guide proper mating of the contactor of the adapter to an external connector.

46. Additionally, Havis's website depicts each Zebra Tablet Mount as comprising the docking cradle of claim 19:



([https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES\\_OMN\\_02-23.pdf](https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES_OMN_02-23.pdf))

47. The docking cradle for use with the Zebra Tablet Mount depicted above is exemplary. Each docking cradle for use with the Zebra Tablet Mounts is comprised of a tray configured to receive the skin and a docking connector comprising a plurality of contacts positioned to connect with one or more of the plurality of contacts of the contactor.

48. Upon information and belief, Havis has induced and continues to induce infringement of one or more claims of the '535 patent, including but not limited to claim 19, by inducing its customers and other third parties to use without authorization the arrangements claimed in the '535 patent, including the Zebra Tablet Mounts in

conjunction with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option. The use, without authorization, of the Zebra Tablet Mounts in conjunction with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option constitutes infringement, literally or under the doctrine of equivalents, of one or more claims of the '535 patent by such customers or third parties. Havis's acts of inducement include: providing its customers with the Zebra Tablet Mounts and intending customers to use the Zebra Tablet Mounts in conjunction with the Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option; advertising these products and their intended use through its own and third-party websites (for example, [https://www.havis.com/product/devmt\\_dockst\\_zeb\\_et5x\\_10\\_in\\_stdndr-134017-0/](https://www.havis.com/product/devmt_dockst_zeb_et5x_10_in_stdndr-134017-0/)); offering technical support to its customers for these products (for example, <https://www.havis.com/support/>); and providing instructions on how to use these products (for example, [https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES\\_OMN\\_02-23.pdf](https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES_OMN_02-23.pdf)).

49. Additionally, upon information and belief, Havis infringes one or more claims of the '535 patent, including but not limited to claim 19, under 35 U.S.C. § 271(f)(1) by supplying, or causing to be supplied, in or from the United States all or a substantial portion of the components of the patented invention, where such components are uncombined in whole or in part, in such a manner as to actively induce the combination of such components—as described in the preceding paragraph—outside of the United States in a manner that would infringe the patent if such combination occurred within the United States.

50. Upon information and belief, Havis has contributed to and continues to contribute to the infringement of one or more claims of the '535 patent, including but not limited to claim 19, by, without authority, selling and/or offering to sell within the United States, importing, and/or supplying components of systems that comprise the patented invention, including but not limited to the Zebra Tablet Mounts. These components supplied by Havis are key components to the arrangements claimed in the '535 patent. When, for example, a Zebra ET50/51 and/or ET55/56 enterprise tablet with the rugged frame option is placed within a Zebra Tablet Mount, the claimed arrangements are formed, thereby infringing, either literally or under the doctrine of equivalents, one or more claims of the '535 patent. Upon information and belief, Havis supplied and continues to supply these components, including without limitation the Zebra Tablet Mounts, with knowledge of the '535 patent and with the knowledge that these components constitute material parts of the inventions claimed in the '535 patent. Further, Havis knows that these components are especially made and/or especially adapted for use as claimed in the '535 patent. Moreover, Havis knows that there is no substantial non-infringing use of these components.

51. Additionally, upon information and belief, Havis infringes one or more claims of the '535 patent, including but not limited to claim 19, under 35 U.S.C. § 271(f)(2) by supplying, or causing to be supplied, in or from the United States components of the patented invention that are especially made or especially adapted for use in the invention and not a staple article or commodity of commerce suitable for substantial noninfringing use—as described in the preceding paragraph—where such

component is uncombined in whole or in part, knowing that such component is so made or adapted and intending that such component will be combined outside of the United States in a manner that would infringe the patent if such combination occurred within the United States.

52. As a direct and proximate consequence of Havis's infringement of the '535 patent, NPI has suffered irreparable harm, and NPI will continue to suffer irreparable harm in the future unless Havis is enjoined from infringing the '535 patent.

53. Havis has had actual knowledge of the '535 patent and its infringement thereof since at least June 30, 2023, when NPI notified Havis that the manufacture, sale, offering for sale, importation, and/or use of the Zebra Tablet Mounts infringes the '535 patent. A true and correct copy of the NPI's notice letter is attached as **Exhibit E**.

54. Upon information and belief, Havis's continued infringement of the '535 patent is willful.

**COUNT III**  
**INFRINGEMENT OF UNITED STATES PATENT NO. 10,778,275**

55. NPI realleges and incorporates by reference the allegations in paragraphs 1–54 above.

56. Havis has directly infringed and continues to directly infringe claims 8–11 of the '275 patent by making, using, offering to sell, and selling within the United States and/or importing into the United States powered docking systems for and used with portable electronic devices, including but not limited to the Havis Tablet Docking

Stations, Tablet Cases, and Havis Docking Kits.

57. Inspection of the Havis Docking Kits, or the Havis Tablet Docking Stations and Tablet Cases demonstrates that, when the products are used together, they meet each and every element of claims 8–11 of the '275 patent, either literally or by the doctrine of equivalents.

58. For example, Havis's website and installation instructions describe its Tablet Cases as designed for use with Havis Tablet Docking Stations, and depicts the products comprising the arrangement for receiving an electronic device of claim 8:



([https://www.havis.com/wp-content/uploads/2022/01/DS-TAB-100%5ETC-100-SERIES\\_OMN\\_11-22.pdf](https://www.havis.com/wp-content/uploads/2022/01/DS-TAB-100%5ETC-100-SERIES_OMN_11-22.pdf))

**IMAGE 1** **IMAGE 2** **IMAGE 3** **INSTALLATION INSTRUCTIONS:**

**IMAGE 4**

**DETAIL A**  
SCALE 2 : 3

DO NOT PULL HARD ON CONNECTOR CABLE DURING ASSEMBLY OR POSSIBLE DISCONNECT MAY OCCUR

USB TYPE C CABLE (NOT INCLUDED) CAN BE USED FOR CHARGING WHEN TABLET IS NOT DOCKED WITH THE DS-TAB-100.

APPLE PENCIL DOCKING PORT FOR WIRELESS CHARGING

1. Note the cable routing detailed in Image 1, Detail A.
2. Insert the connector from the Protective Case into the Apple iPad, maintaining the orientation shown in Detail A.
3. Place the iPad into the Rear Protective Case and ensure that the cable routing matches that shown in Detail A. Be careful not to pinch the cable.
4. Place Front Protective Case onto the rear, noting that the Havis logo should be positioned on the bottom side (connector side) of the iPad. Ensure that the cable is not pinched when placing the two halves together.
5. Your Protective Case includes four (4) snap fits located in the areas circled in Image 2. Apply light pressure until all the snaps are interlocked.
6. Holding the two pieces together, carefully turn the Protective Case over.
7. Fasten all eight (8) of the M2.5 x 6mm screws (Item #1) with the supplied T8 torx bit (Item #2) into the locations shown in Image 3. Torque to 4 in-lbs +/- 10%. Do not over-tighten screws.

**NOTE:** Hardware kit includes extra screws in the event of loss or damage.

**NOTE:** Protective case will allow for storage and charging of compatible Apple Pencil in location noted in Image 4.

**DRAWING NO.**  
TC-111\_INST\_11-22

**PRODUCT DESCRIPTION**  
ASSY, TABLET CASE, APPLE IPAD AIR 4TH & 5TH GEN

**HAVIS**  
1-800-824-9900  
WWW.HAVIS.COM

**WEIGHT: (LBS)**  
2.225

**REV. DATE**  
11-22

**HARDWARE KIT CONTENTS**

ITEM NO.	DESCRIPTION	QTY.	FINISH	DRIVE STYLE/ SIZE
1	THREAD-FORMING SCREW, WASHER HEAD, M2.5 STS+ THREAD, 6MM LONG, T8 DRIVE, STEEL, ZINC-NICKEL PLATED, BLACK	12	ZINC-NICKEL PLATED, BLACK	T8
2	T-8 PIN-IN TORX BIT	1	N/A	1/4" HEX

**WARNING:** ALL HAVIS INC. PRODUCTS ARE DESIGNED WITH SAFETY OF USE AND INSTALLATION IN MIND. HOWEVER, IT IS THE SOLE RESPONSIBILITY OF THE OWNER/OPERATOR OF A VEHICLE USING HAVIS INC. MOUNTING AND DOCKING EQUIPMENT TO INSURE THAT THE EQUIPMENT IS INSTALLED SO THAT IT WILL NOT INTERFERE WITH VEHICLE OPERATION, INTERFERE WITH SAFETY DEVICES, OBSTRUCT VIEW OF DRIVING CONDITIONS, OR IN ANY WAY DEGRADE OCCUPANT SAFETY. IMPROPER INSTALLATION CAN CAUSE SERIOUS INJURY IN THE EVENT OF AN ACCIDENT. INSTALLATION SHOULD ONLY BE PERFORMED BY QUALIFIED PROFESSIONALS. COMPUTERS AND MOTION DEVICES MUST BE MOVED TO AND STOWED/SECURED IN THEIR SAFE DRIVING POSITIONS BEFORE OPERATING VEHICLE.

([https://www.havis.com/wp-content/uploads/2022/01/TC-111\\_INST\\_11-22.pdf](https://www.havis.com/wp-content/uploads/2022/01/TC-111_INST_11-22.pdf))

59. The arrangement for receiving an electronic device for use with a Havis Tablet Docking Station depicted above is exemplary. Each arrangement for receiving an electronic device for use with the Havis Tablet Docking Station is comprised of a cover comprising a panel and a skirt surrounding the panel, the panel comprising an exterior surface, wherein the panel and the skirt form an interior cavity therebetween, wherein the interior cavity is configured and arranged to receive an electronic device, wherein the cover is configured and arranged to cover a back face of the electronic device with the panel, to at least partially cover a plurality of side faces of the electronic device, and to extend around a peripheral edge of a front face of the electronic device to secure the electronic device within the cover. Each arrangement further contains a male plug

comprising a plurality of connectors extending into the interior cavity of the cover, wherein the male plug is positioned to the cover for mating with a female socket of the electronic device when received in the cover. Additionally, each arrangement contains a contactor disposed on the exterior surface of the panel and configured to be positioned over the back face of the electronic device when the electronic device is received in the interior cavity, the contactor comprising a plurality of electronic contacts, and contains electrical conductors extending within the cover and electrically interconnecting the electrical contacts of the contactor with the connectors of the male plug:



([https://www.havis.com/product/devmt\\_tablet\\_case\\_app\\_12\\_9\\_ipad\\_pro\\_eld-130525-0/](https://www.havis.com/product/devmt_tablet_case_app_12_9_ipad_pro_eld-130525-0/))

60. Additionally, Havis's website depicts each Havis Tablet Docking Station as comprising the docking system of claim 8, wherein the biasing electrical contacts are spring-loaded pogo pins (claim 9) arranged in a single line (claim 10):





([https://www.havis.com/product/devmt\\_dockst\\_tablet\\_chrg\\_data\\_usb\\_c-128674-0/](https://www.havis.com/product/devmt_dockst_tablet_chrg_data_usb_c-128674-0/))

61. As shown above, the docking connector of the Havis Tablet Docking Station further includes a socket receiver and a peripheral surface forming a support rim around at least a portion of a perimeter of the socket receiver, wherein the socket receiver is recessed relative to the peripheral surface and the plurality of electrical contacts are

disposed along the socket receiver.

62. The docking system for use with the Havis Tablet Docking Station depicted above is exemplary. Each docking system for use with the Havis Tablet Docking Stations is comprised of a protective arrangement and a docking connector comprising a plurality of contacts arranged to connect with the plurality of the electrical contacts of the contactor.

63. Upon information and belief, Havis has induced and continues to induce infringement of claims 8–11 of the '275 patent by inducing its customers and other third parties to use without authorization the docking systems claimed in the '275 patent, including the Havis Tablet Docking Stations in conjunction with the Tablet Cases. The use, without authorization, of the Havis Tablet Docking Stations in conjunction with the Tablet Cases, constitutes infringement, literally or under the doctrine of equivalents, of claims 8–11 of the '275 patent by such customers or third parties. Havis's acts of inducement include: providing its customers with the Tablet Cases and intending customers to use the Tablet Cases in conjunction with the Havis Tablet Docking Stations; providing its customers with the Havis Tablet Docking Stations and intending customers to use the Havis Tablet Docking Stations in conjunction with the Tablet Cases; advertising these products and their intended use through its own and third-party websites (for example, [https://www.havis.com/product/devmt\\_dockst\\_tablet\\_chrg\\_data\\_usb\\_c-128674-0/](https://www.havis.com/product/devmt_dockst_tablet_chrg_data_usb_c-128674-0/)); offering technical support to its customers for these products (for example, <https://www.havis.com/support/>); and providing instructions on how to use these products (for example [26](https://www.havis.com/wp-content/uploads/2022/01/DS-TAB-</a></p></div><div data-bbox=)

[100%5ETC-100-SERIES\\_OMN\\_06-21.pdf](#)).

64. Additionally, upon information and belief, Havis infringes claims 8–11 of the '275 patent under 35 U.S.C. § 271(f)(1) by supplying, or causing to be supplied, in or from the United States all or a substantial portion of the components of the patented invention, where such components are uncombined in whole or in part, in such a manner as to actively induce the combination of such components—as described in the preceding paragraph—outside of the United States in a manner that would infringe the patent if such combination occurred within the United States.

65. Upon information and belief, Havis has contributed to and continues to contribute to the infringement of claims 8–11 of the '275 patent by, without authority, selling and/or offering to sell within the United States, importing, and/or supplying components of systems that comprise the patented invention, including but not limited to the Havis Tablet Docking Stations and Tablet Cases. These components supplied by Havis are key components to the docking systems claimed in the '275 patent. When, for example, a Tablet Case is placed within a Havis Tablet Docking Station, the claimed docking systems are formed, thereby infringing, either literally or under the doctrine of equivalents, claims 8–11 of the '275 patent. Upon information and belief, Havis supplied and continues to supply these components, including without limitation the Havis Tablet Docking Stations and Tablet Cases, with the knowledge of the '275 patent and with the knowledge that these components constitute material parts of the inventions claimed in the '275 patent. Further, Havis knows that these components are especially made and/or

especially adapted for use as claimed in the '275 patent. Moreover, Havis knows that there is no substantial non-infringing use of these components.

66. Additionally, upon information and belief, Havis infringes claims 8–11 of the '275 patent under 35 U.S.C. § 271(f)(2) by supplying, or causing to be supplied, in or from the United States components of the patented invention that are especially made or especially adapted for use in the invention and not a staple article or commodity of commerce suitable for substantial noninfringing use—as described in the preceding paragraph—where such component is uncombined in whole or in part, knowing that such component is so made or adapted and intending that such component will be combined outside of the United States in a manner that would infringe the patent if such combination occurred within the United States.

67. As a direct and proximate consequence of Havis's infringement of the '275 patent, NPI has suffered irreparable harm, and NPI will continue to suffer irreparable harm in the future unless Havis is enjoined from infringing the '275 patent.

68. Havis has had actual knowledge of the '275 patent and its infringement thereof since at least March 3, 2023, when NPI notified Havis that the manufacture, sale, offering for sale, importation, and/or use of the Tablet Cases, Havis Tablet Docking Stations, and Havis Docking Kits infringes the '275 patent. A true and correct copy of the NPI notice letter is attached as **Exhibit F**.

69. Upon information and belief, Havis's continued infringement of the '275 patent is willful.

**COUNT IV**  
**INFRINGEMENT OF UNITED STATES PATENT NO. 11,165,458**

70. NPI realleges and incorporates by reference the allegations in paragraphs 1–69 above.

71. Havis has directly infringed and continues to directly infringe at least claim 20 of the '458 patent by using within the United States and/or importing into the United States powered docking systems for and used with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option, including but not limited to the Zebra Tablet Mounts.






72. Inspection of the Zebra Tablet Mounts demonstrates that, when used with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option, they meet each and every element of claim 20 of the '458 patent, either literally or by the doctrine of equivalents.

73. For example, Zebra's website describes its ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option as designed for use with third-party docking systems, and depicts the products comprising the protective arrangement of claim 20:

## Accessory Ecosystem Overview



## Rugged Frames, D-Clips & Tethers

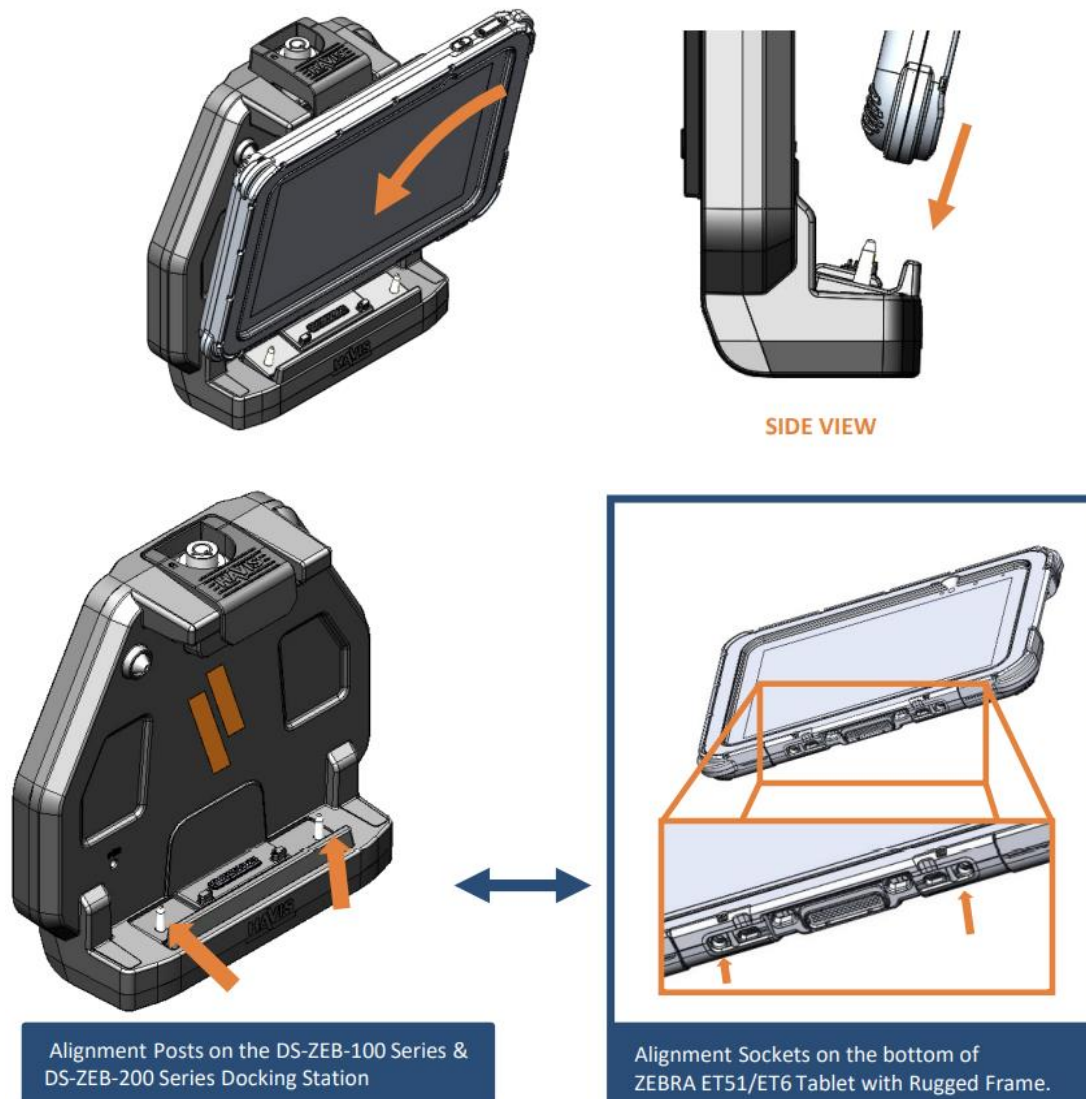
8 in. & 10 in. Rugged Frames	D-Clips & Tethers
	
<b>SG-ET5X-8RCSE2-02</b> 8 in. Rugged Frame with Rugged I/O connector (Included)	<b>SG-ET5X-DCLIP2-02</b> 2 D-Clips attach to screw bosses in rugged frame
	
<b>SG-ET5X-10RCSE2-01</b> 10 in. Rugged Frame with Rugged I/O connector (Included)	<b>SG-TC7X-STYLUS-03</b> TC7X 3-Pack STYLUS + TETHER
<ul style="list-style-type: none"> <li>Improves drop protection to 6 ft (2m) to concrete</li> <li>Sealed I/O connector replaces bottom dust cover</li> <li>Screw bosses on back to attach hand and shoulder straps</li> <li>Works with or without Expansion Backs</li> </ul>	<ul style="list-style-type: none"> <li>TC7X passive stylus (no batteries needed, more durable)</li> <li>3-Pack + Tether (single stylus unit is not available)</li> <li><b>Note:</b> stylus will not work in areas where water is pooled on the screen</li> </ul>
	
	<b>SG-ET5X-SLTETR-01</b> Stylus coil tether
	<ul style="list-style-type: none"> <li>Coiled tether provides a convenient method to keep your tablet and pen together without compromising your usage experience</li> </ul>

([https://www.zebra.com/content/dam/zebra\\_dam/en/guide/configuration-and-accessories/et51-et56-guide-accessory-en-us.pdf](https://www.zebra.com/content/dam/zebra_dam/en/guide/configuration-and-accessories/et51-et56-guide-accessory-en-us.pdf))

74. The protective arrangement for use with the Zebra Tablet Mount depicted above is exemplary. Each protective arrangement for a Zebra tablet for use with the Zebra Tablet Mounts comprises a removable cover comprising a panel and a skirt that meets edges of the panel, the removable cover comprising an exterior surface and an

adapter opening through the exterior surface, wherein the panel and the skirt form an interior cavity therebetween, and the skirt forming a mouth opening that communicates with the interior cavity, wherein the interior cavity is configured and arranged to receive a Zebra tablet. The protective arrangement further contains an adapter comprising a male plug extending in a longitudinal direction into the interior cavity of the removable cover in an arrangement for mating with a female socket of the electronic device and a contactor opposite the male plug and configured for exposure through the adapter opening in the exterior surface of the removable cover, the male plug comprising a plurality of connectors for mating with connectors in the female socket of the electronic device, the contactor comprising a lateral surface recessed relative to the removable cover and a plurality of electrical contacts arranged on the lateral surface and configured for exposure through the adapter opening of the removable cover, wherein the electrical contacts are electrically coupled to one or more of the connectors of the male plug, wherein the longitudinal direction of the male plug is perpendicular to the lateral surface of the contactor.

75. Additionally, Havis's owner's manual depicts each Zebra Tablet Mount as comprising the docking system of claim 20:



([https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES\\_OMN\\_02-23.pdf](https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES_OMN_02-23.pdf))

76. The docking system for use with the Zebra Tablet Mount depicted above is exemplary. Each docking system for use with the Zebra Tablet Mounts is comprised of a protective arrangement and a docking connector comprising a plurality of contacts arranged to connect with the plurality of the electrical contacts of the contactor.

77. Upon information and belief, Havis has induced and continues to induce infringement of one or more claims of the '458 patent, including but not limited to



claim 20, by inducing its customers and other third parties to use without authorization the arrangements claimed in the '458 patent, including the Zebra Tablet Mounts in conjunction with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option. The use, without authorization, of the Zebra Tablet Mounts in conjunction with Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option constitutes infringement, literally or under the doctrine of equivalents, of one or more claims of the '458 patent by such customers or third parties. Havis's acts of inducement include: providing its customers with the Zebra Tablet Mounts and intending customers to use the Zebra Tablet Mounts in conjunction with the Zebra ET50/51 and/or ET55/56 enterprise tablets with the rugged frame option; advertising these products and their intended use through its own and third-party websites (for example, [https://www.havis.com/product/devmt\\_dockst\\_zeb\\_et5x\\_10\\_in\\_stdndrd-134017-0/](https://www.havis.com/product/devmt_dockst_zeb_et5x_10_in_stdndrd-134017-0/)); offering technical support to its customers for these products (for example, <https://www.havis.com/support/>); and providing instructions on how to use these products (for example, [https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES\\_OMN\\_02-23.pdf](https://www.havis.com/wp-content/uploads/2023/02/DS-ZEB-100-200-SERIES_OMN_02-23.pdf)).

78. Additionally, upon information and belief, Havis infringes one or more claims of the '458 patent, including but not limited to claim 20, under 35 U.S.C. § 271(f)(1) by supplying, or causing to be supplied, in or from the United States all or a substantial portion of the components of the patented invention, where such components are uncombined in whole or in part, in such a manner as to actively induce the combination of such components—as described in the preceding paragraph—outside of

the United States in a manner that would infringe the patent if such combination occurred within the United States.

79. Upon information and belief, Havis has contributed to and continues to contribute to the infringement of one or more claims of the '458 patent, including but not limited to claim 20, by, without authority, selling and/or offering to sell within the United States, importing, and/or supplying components of systems that comprise the patented invention, including but not limited to the Zebra Tablet Mounts. These components supplied by Havis are key components to the arrangements claimed in the '458 patent. When, for example, a Zebra ET50/51 and/or ET55/56 enterprise tablet with the rugged frame option is placed within a Zebra Tablet Mount, the claimed arrangements are formed, thereby infringing, either literally or under the doctrine of equivalents, one or more claims of the '458 patent. Upon information and belief, Havis supplied and continues to supply these components, including without limitation the Zebra Tablet Mounts, with knowledge of the '458 patent and with the knowledge that these components constitute material parts of the inventions claimed in the '458 patent. Further, Havis knows that these components are especially made and/or especially adapted for use as claimed in the '458 patent. Moreover, Havis knows that there is no substantial non-infringing use of these components.

80. Additionally, upon information and belief, Havis infringes one or more claims of the '458 patent, including but not limited to claim 20, under 35 U.S.C. § 271(f)(2) by supplying, or causing to be supplied, in or from the United States components of the patented invention that are especially made or especially adapted for

use in the invention and not a staple article or commodity of commerce suitable for substantial noninfringing use—as described in the preceding paragraph—where such component is uncombined in whole or in part, knowing that such component is so made or adapted and intending that such component will be combined outside of the United States in a manner that would infringe the patent if such combination occurred within the United States.

81. As a direct and proximate consequence of Havis’s infringement of the ’458 patent, NPI has suffered irreparable harm, and NPI will continue to suffer irreparable harm in the future unless Havis is enjoined from infringing the ’458 patent.

82. Havis has had actual knowledge of the ’458 patent and its infringement thereof since at least March 3, 2023, when NPI notified Havis that the manufacture, sale, offering for sale, importation, and/or use of the Zebra Tablet Mounts infringes the ’458 patent. A true and correct copy of the NPI’s notice letter is attached as **Exhibit F**.

83. Upon information and belief, Havis’s continued infringement of the ’458 patent is willful.

#### **PRAYER FOR RELIEF**

WHEREFORE, NPI prays for the following relief:

- a. A judgment that Havis has infringed the ’639, ’535, ’275 and ’458 patents;
- b. An order preliminarily and permanently enjoining and restraining Havis, its officers, directors, agents, servants, employees, licensees, attorneys, and all other persons acting under or through them, directly or indirectly, from

infringing the '639, '535, '275 and '458 patents;

- c. A judgment and order requiring that Havis pay damages under 35 U.S.C. § 284, with prejudgment and post-judgment interest;
- d. A judgment that Havis's infringement has been willful, and that damages are increased three-fold;
- e. A judgment and order directing Havis to pay the costs of this action, including all disbursements and attorney fees as provided by 35 U.S.C. § 285, with prejudgment interest; and
- f. Such other and further relief as the Court may deem just and equitable.

**DEMAND FOR JURY TRIAL**

NPI hereby demands a trial by jury of all issues so triable.

Dated: November 30, 2023

Respectfully submitted,

By: s/Matthew J. Goggin

Matthew J. Goggin (#0210705)

Alexandra J. Olson (#0390145)

CARLSON, CASPERS, VANDENBURGH  
& LINDQUIST, P.A.

225 South Sixth Street, Suite 4200

Minneapolis, MN 55402

Phone: (612) 436-9600

Facsimile: (612) 436-9605

mgoggin@carlsoncaspers.com

aolson@carlsoncaspers.com

David K. Tellekson (*pro hac vice* to be filed)

Jonathan G. Tamimi (*pro hac vice* to be filed)

FENWICK & WEST LLP

401 Union Street, 5th Floor

Seattle, WA 98101

Telephone: 206.389.4510

dtellekson@fenwick.com

jtamimi@fenwick.com

*Attorneys for Plaintiff National Products, Inc.*