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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CADENCE DESIGN SYSTEMS, INC., *a*
Delaware Corporation,

Plaintiff,

v.

CONVENIENTPOWER HK LTD., *a Hong*
Kong Private Limited Company,
CONVENIENTPOWER US, INC., *a Delaware*
Corporation, SHENZHEN YICHONG
WIRELESS TECHNOLOGY CO., LTD, *a*
Chinese Limited Company, SICHUAN
YICHONG TECHNOLOGY CO., LTD., *a*
Chinese Limited Company, E-CHARGING,
INC., *a California Corporation,*

Defendants.

Case No. 21-4771

**COMPLAINT FOR INJUNCTIVE RELIEF
AND DAMAGES FOR:**

- 1. COPYRIGHT INFRINGEMENT;**
- 2. CIRCUMVENTION OF
COPYRIGHT PROTECTION
SYSTEMS;**
- 3. BREACH OF CONTRACT**

DEMAND FOR JURY TRIAL

1 For its complaint, Plaintiff Cadence Design Systems, Inc. (“Cadence”) alleges against
2 Defendants ConvenientPower HK, Ltd. (“ConvenientPower HK”), ConvenientPower US, Inc.
3 (“ConvenientPower USA”), Shenzhen Yichong Wireless Technology Co., Ltd. (“Shenzhen
4 Yichong”), Sichuan Yichong Technology Co., Ltd. (“Sichuan Yichong”), and E-Charging Inc. (“E-
5 Charging USA”) (collectively, “ConvenientPower”) as follows:

6 1. This is an action for copyright infringement, circumvention of copyright protection
7 systems, and breach of contract.

8 **PARTIES**

9 2. Plaintiff Cadence is a Delaware corporation with its principal place of business at 2655
10 Seely Avenue, San Jose, California 95134.

11 3. Defendant ConvenientPower HK, Ltd. (“ConvenientPower HK”) is a Hong Kong
12 private company with its principal place of business at Room 1301, 13/F, Blissful Building, No. 243-
13 247 Des Voeux Road Central, Hong Kong.

14 4. Defendant ConvenientPower US, Inc. (“ConvenientPower USA”) is a Delaware
15 Corporation with its principal place of business at 2240 Agnew Road Santa Clara, CA 95054.
16 ConvenientPower USA filed its Articles of Incorporation on April 17, 2014.

17 5. Defendant Shenzhen Yichong Wireless Technology Co., Ltd. (“Shenzhen Yichong”)
18 is a Chinese limited company with an office located at Room 1001, 10 Floor, Microprofit Plaza,
19 Gaoxin South 6th Road, Nanshan, Shenzhen, 518063, People’s Republic of China.

20 6. Defendant Sichuan Yichong Technology Co., Ltd. (“Sichuan Yichong”) is a Chinese
21 limited company with an office located at Unit A-10, 4 Floor, Tianfu Jingrong Center,
22 North Hupan Road, Tianfu New Area, Chengdu 610000, Sichuan, People’s Republic of China. On
23 information and belief, Sichuan Yichong also refers, or has referred, to itself as Chengdu Yichong
24 Wireless Technology Co., Ltd. and Chengdu Yichong Semiconductor Co., Ltd.

25 7. Defendant E-Charging Inc. (“E-Charging USA”) is a California Corporation with its
26 principal place of business at 1569 Fairway Green Cir., San Jose, CA 95131.

Defendants Are Alter Egos and a Single Enterprise

8. On information and belief, ConvenientPower HK, ConvenientPower USA, Shenzhen Yichong, Sichuan Yichong, and E-Charging USA are a single enterprise and/or alter egos of one another.

9. ConvenientPower HK and ConvenientPower USA share a unity of interest.

10. ConvenientPower HK and ConvenientPower USA have overlapping officers and employees.

11. On information and belief, ConvenientPower HK, ConvenientPower USA, Shenzhen Yichong, Sichuan Yichong, and E-Charging USA are under the same equitable control.

12. Siming Pan is the Chief Executive Officer, legal representative, and/or leader of ConvenientPower HK, ConvenientPower USA, Shenzhen Yichong, Sichuan Yichong, and E-Charging USA.

13. The entity referred to as Convenient Power HK was established in 2006.

14. The entity referred to as Shenzhen Yichong was established in 2016.

15. Defendants Shenzhen Yichong and ConvenientPower HK claim that they entered a “strategic cooperation” in August of 2017.

16. In some instances, Defendants identify their “strategic cooperation” as “Echong Wireless Group.”

17. In some instances, Defendants identify their “strategic cooperation” as “Easy Chong Wireless.”

18. In some instances, Defendants identify their “strategic cooperation” as “ConvenientPower Systems.”

19. Defendants interchangeably refer to themselves collectively as Echong Wireless Group and ConvenientPower Systems.

20. For example, at least one online job posting related to “Easy Chong Wireless,” states under “Company Profile” that “Echong Wireless Group, (English: ConvenientPower) is a global high tech enterprise focusing on the field of wireless charging.”

1 21. This same job posting represents that Defendant Shenzhen Yichong and E-Charging
2 Inc. are one and the same.

3 22. This same job posting states that Defendants ConvenientPower HK and Shenzhen
4 Yichong entered into a “strategic cooperation . . . headquartered in Hong Kong, and has branches in
5 Shenzhen [and] Silicon Valley.”

6 23. On information and belief, E-Charging USA and ConvenientPower USA are
7 Defendants’ “branches” in Silicon Valley.

8 24. On January 9, 2018, ConvenientPower Systems issued a press releases wherein
9 Defendants identified themselves as “ConvenientPower Systems (CPS)” and stated that the “CPS
10 Group is located in Hong Kong, San Francisco, Shenzhen, Chengdu.”

11 25. On information and belief, the locations identified in Defendants’ January 9, 2018
12 press release—Hong Kong, San Francisco, Shenzhen, Chengdu—correspond to Defendants
13 ConvenientPower HK, ConvenientPower USA, Shenzhen Yichong, and Sichuan Yichong,
14 respectively.

15 26. Defendants share a website, namely www.convenientpower.com.

16 27. Defendants collectively refer to themselves as “ConvenientPower” and
17 “ConvenientPower Systems” without claiming any legal separateness.

18 28. For example, on information and belief, Defendants’ English website
19 (convenientpower.com/home/contact-us/#findus) lists several business addresses that correspond to
20 Defendants ConvenientPower HK, ConvenientPower USA, Sichuan Yichong, and Shenzhen
21 Yichong without mentioning any legal separateness.

22 29. ConvenientPower organizes its business activities by region and business units rather
23 than legal entities.

24 30. For example, ConvenientPower represents that its officer and employee Majid Kafi is
25 “Vice President, General Manager, US Operation, Chip Business Group.”

26 31. Defendants share trade names, namely “ConvenientPower” and “Yichong Wireless.”

27 32. It would be inequitable for Defendants to hide behind their corporate veils.
28

33. For example, it would be inequitable for Defendants to hold themselves out to the public as a single entity (*e.g.*, “Convenient Power Systems”), disregarding any corporate separateness, and then deny they are one and the same for purposes of avoiding liability and/or frustrating enforcement of any eventual judgment.

34. Defendants have also acted in bad faith.

35. For example, before bringing suit, Plaintiff contacted ConvenientPower to attempt to resolve the claims set forth herein. On several instances, ConvenientPower promised to investigate Plaintiff's claims and reply to Cadence's inquiries. Most recently, ConvenientPower asked for additional data supporting Cadence's claims, which Cadence readily provided. Yet ConvenientPower's representatives in China refused to follow through on their promises. As set forth below, Defendants also continued their unauthorized infringement and other wrongful conduct well after receiving explicit notice from Cadence.

Defendants are Joint Venturers

36. On information and belief, all five Defendants are members of a joint venture.

37. ConvenientPower and Yichong Wireless stated that they entered into a “strategic cooperation” in 2017.

38. On information and belief, Defendants have referred to themselves collectively as a “joint venture.”

39. One online article dated September 15, 2017 reports that “Shenzhen-based E-Charging Wireless Technology Co. has entered into a strategic partnership with ConvenientPower HK Ltd., a longtime wireless charging market leader in Hong Kong, to set up a joint venture, ConvenientPower Systems (CPS).”

40. On information and belief, Defendant Shenzhen Yichong is also referred to as “Shenzhen E-Charging Wireless Technology Co.”

41. On information and belief, Defendants combined their property, skill, and/or knowledge with the intent to carry out a single business undertaking, namely to create and sell wireless charging products.

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