

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

**PRINCEPS INTERFACE  
TECHNOLOGIES LLC,**

**Plaintiff,**

**v.**

**ALPHABET INC., and GOOGLE LLC,**

**Defendant.**

**Civ. No. \_\_\_\_\_**

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Princeps Interface Technologies LLC (“Princeps” or “Plaintiff”), for its Complaint against Defendants Alphabet Inc. (“Alphabet”) and Google LLC (“Google”), alleges the following:

**NATURE OF THE ACTION**

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

**THE PARTIES**

2. Plaintiff Princeps is a limited liability company organized under the laws of the State of Delaware.

3. Upon information and belief, Defendant Alphabet Inc. (“Alphabet”) is a Delaware corporation, organized and existing under the laws of the State of Delaware, with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043-1351.

Alphabet is the successor issuer to, and parent holding company of, Google Inc. Alphabet owns all of the equity interests in Google Inc. The reorganization of Google Inc., into Alphabet was completed in 2015.

4. Upon information and belief, Defendant Google LLC (“Google”) is a Delaware corporation, organized and existing under the laws of the State of Delaware, with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043-1351. It has operated as an LLC subsidiary of Alphabet since 2017 and is Alphabet’s largest subsidiary. Most of the operations and sales previously encompassed by Google Inc. have been placed with Google LLC under Alphabet Inc.

#### **JURISDICTION AND VENUE**

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

6. Venue with respect to Defendant Alphabet is proper in this District under 28 U.S.C. § 1400(b) because Alphabet is a Delaware corporation and therefore resides in this District.

7. This Court has personal jurisdiction over Alphabet. Alphabet is amenable to service of summons for this action. Furthermore, personal jurisdiction over Alphabet in this action comports with due process. Alphabet has conducted and regularly conducts business within the United States and this District. Alphabet has purposefully availed itself of the privileges of conducting business in the United States, and more specifically in the State of Delaware and this District. Alphabet has sought protection and benefit from the laws of the State of Delaware by forming itself in this District and/or by placing infringing products into the stream of commerce through an established distribution channel with the awareness and/or intent that they will be purchased by consumers in this District.

8. Alphabet – directly or through intermediaries (including distributors, retailers, and others), subsidiaries, alter egos, and/or agents – ships, distributes, offers for sale, and/or sells its products in the United States and this District. Alphabet has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the awareness and/or

intent that they will be purchased by consumers in this District. Alphabet knowingly and purposefully ships infringing products into and within this District through an established distribution channel. These infringing products have been and continue to be purchased by consumers in this District. Upon information and belief, through those activities, Alphabet has committed the tort of patent infringement in this District.

9. On information and belief, Defendant Alphabet is subject to this Court's general and specific personal jurisdiction because Alphabet has sufficient minimum contacts within the State of Delaware and this District, pursuant to due process and/or the Del. Code. Ann. Tit. 3, § 3104, because Defendant Alphabet purposefully availed itself of the privileges of conducting business in the State of Delaware and in this District, because Defendant Alphabet regularly conducts and solicits business within the State of Delaware and within this District, and because Plaintiff's causes of action arise directly from Defendant's business contacts and other activities in the State of Delaware and this District. Having purposefully availed itself of the privilege of conducting business within this District, Defendant Alphabet should reasonably and fairly anticipate being brought into court here.

10. Venue with respect to Defendant Google is proper in this District under 28 U.S.C. § 1400(b) because Google is a Delaware corporation and therefore resides in this District.

11. This Court has personal jurisdiction over Google. Google is amenable to service of summons for this action. Furthermore, personal jurisdiction over Google in this action comports with due process. Google has conducted and regularly conducts business within the United States and this District. Google has purposefully availed itself of the privileges of conducting business in the United States, and more specifically in the State of Delaware and this District. Google has sought protection and benefit from the laws of the State of Delaware by forming

itself in this District and/or by placing infringing products into the stream of commerce through an established distribution channel with the awareness and/or intent that they will be purchased by consumers in this District.

12. Google – directly or through intermediaries (including distributors, retailers, and others), subsidiaries, alter egos, and/or agents – ships, distributes, offers for sale, and/or sells its products in the United States and this District. Google has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the awareness and/or intent that they will be purchased by consumers in this District. Google knowingly and purposefully ships infringing products into and within this District through an established distribution channel. These infringing products have been and continue to be purchased by consumers in this District. Upon information and belief, through those activities, Google has committed the tort of patent infringement in this District.

13. On information and belief, Defendant Google is subject to this Court’s general and specific personal jurisdiction because Google has sufficient minimum contacts within the State of Delaware and this District, pursuant to due process and/or the Del. Code. Ann. Tit. 3, § 3104, because Defendant Google purposefully availed itself of the privileges of conducting business in the State of Delaware and in this District, because Defendant Google regularly conducts and solicits business within the State of Delaware and within this District, and because Plaintiff’s causes of action arise directly from Defendant’s business contacts and other activities in the State of Delaware and this District. Having purposefully availed itself of the privilege of conducting business within this District, Defendant Google should reasonably and fairly anticipate being brought into court here.

## **BACKGROUND**

### **The Inventions**

14. Timothy B. Higginson is the sole inventor (hereinafter “the Inventor”) of U.S. Patent No. 6,703,963 (“the ’963 patent” or “the patent in suit”). A true and correct copy of the ’963 patent is attached hereto as Exhibit A.

15. The ’963 patent resulted from the pioneering efforts of the Inventor in the area of small-profile multifunctional input devices. These efforts resulted in the development of novel input devices, and methods for operating them. The input devices utilize one or more functional modes and one or more domain levels associated with entering input values into the devices. A provisional patent application directed to the inventions was filed in the United States in September 2001.

16. At the time of the Inventor’s pioneering efforts, the most widely implemented technology used to address keying input data still involved implementing variants of the traditional two-handed QWERTY keyboard. In that type of system, as explained in the ’963 patent:

The QWERTY keyboard has been used as an input means since the development of the very first electronic devices. However, with the development of smaller, portable electronic devices, use of the QWERTY keyboard with these devices has certain drawbacks. As electronic devices have become smaller through advances in integrated circuitry, the traditional QWERTY keyboard is simply too large for many of the smaller electronic devices as the keyboard must be large enough to accommodate both hands of the user. Moreover, due the large size of the traditional keyboard, it is not sufficiently portable for use in conjunction with many of these electronic devices.

Previous attempts to overcome this short coming of the keyboard have included the use of foldable keyboards as shown in U.S. Pat. No. 6,174,097 and the use of keyboards that allow for the direct connection of the electronic device to a full-size portable QWERTY keyboard as shown in U.S. Pat. No. 6,108,200. However, neither of these approaches reduces the area required for the use of the keyboard.

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