

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

**PRINCEPS INTERFACE
TECHNOLOGIES LLC,**

Plaintiff,

v.

**LENOVO GROUP LIMITED, LENOVO
(UNITED STATES) INC., LENOVO
GLOBAL TECHNOLOGY (UNITED
STATES) INC. and LENOVO CONNECT
(UNITED STATES) INC.,**

Defendants.

Civ. No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Princeps Interface Technologies LLC (“Princeps” or “Plaintiff”), for its Complaint against Defendants Lenovo Group Limited (“LGL”); Lenovo (United States) Inc. (“LUS”); Lenovo Global Technology (United States) Inc. (“LGTUS”) and Lenovo Connect (United States) Inc. (“LCUS”), (collectively “Lenovo” or “Defendants”), 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 with a place of business at Princeps Interface Technologies LLC, c/o Kustal and Kustal, P.C., 261 West 35th Street, Suite No. 1003, New York, New York 10001.

3. Upon information and belief, Defendant Lenovo Group Limited (“LGL”) is a Chinese corporation having its principal place of business at No. 6 Chuang Ye Road, Haidian District, Shangdi Information Industry Base, 100085 Beijing, China. LGL produces and sells telecommunications, electronics and mobile phone technologies worldwide, including in the United States and in this District. More specifically, Defendant LGL works in the designing, manufacturing, importing, distributing and selling of the Accused Instrumentalities under the brand name “Motorola Mobility” as described in more detail below and in the attached claim chart.

4. Upon information and belief, Defendant Lenovo (United States) Inc. (“LUS”) is a Delaware corporation having its principal place of business at 8001 Development Drive, Morrisville, North Carolina 27560. Defendant LUS is a subsidiary of or otherwise controlled by LGL. Defendants LGL and LUS act in concert regarding the allegations set forth in this Complaint and, therefore, the conduct described herein is fairly attributable to either or both entities. More specifically, Defendants LUS and LGL work collectively in the designing, manufacturing, importing, distributing and selling of the Accused Instrumentalities under the brand name “Motorola Mobility” as described in more detail below and in the attached claim chart.

5. Upon information and belief, Defendant Lenovo Global Technology (United States) Inc. (“LGTUS”) is a Delaware corporation having its principal place of business at 8001 Development Drive, Morrisville, North Carolina 27560. Defendant LGTUS is a subsidiary of or otherwise controlled by LGL. Defendants LGL and LGTUS act in concert regarding the allegations set forth in this Complaint and, therefore, the conduct described herein is fairly attributable to either or both entities. More specifically, Defendants LGTUS and LGL work

collectively in the designing, manufacturing, importing, distributing and selling of the Accused Instrumentalities under the brand name “Motorola Mobility” as described in more detail below and in the attached claim chart.

6. Upon information and belief, Defendant Lenovo Connect (United States) Inc. (“LCUS”) is a Delaware corporation having its principal place of business at 8001 Development Drive, Morrisville, North Carolina 27560. Defendant LCUS is a subsidiary of or otherwise controlled by LGL. Defendants LGL and LCUS act in concert regarding the allegations set forth in this Complaint and, therefore, the conduct described herein is fairly attributable to either or both entities. More specifically, Defendants LCUS and LGL work collectively in the designing, manufacturing, importing, distributing and selling of the Accused Instrumentalities under the brand name “Motorola Mobility” as described in more detail below and in the attached claim chart.

7. Upon information and belief, the Defendants (LGL, LUS, LGTUS and LCUS) work collectively and interact extensively as a united entity in the designing, manufacturing, importing, distributing and selling of the Accused Instrumentalities under the brand name “Motorola Mobility” as described in more detail below and in the attached claim chart.

JURISDICTION AND VENUE

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

9. Venue with respect to Defendant LGL is proper in this District under 28 U.S.C. § 1391(c)(3) because, upon information and belief, Defendant LGL is not a resident of the United States, and also under 28 U.S.C. § 1391(b)(2) because LGL sells and offers to sell products and services throughout the United States, including in this District, and introduces products and services into the stream of commerce and effectuates these sales knowing that the products and services would be sold in this District and elsewhere in the United States.

10. This Court has personal jurisdiction over LGL. LGL is amenable to service of summons for this action. Defendant LGL has sought protection and benefit from the laws of the State of Delaware by forming one of its United States affiliates 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.

11. LGL – 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. LGL 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. LGL 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, LGL has committed the tort of patent infringement in this District.

12. On information and belief, Defendant LGL is subject to this Court's general and specific personal jurisdiction because LGL 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 LGL purposefully availed itself of the privileges of conducting business in the State of Delaware and in this District, because Defendant LGL 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 LGL'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 LGL should reasonably and fairly anticipate being brought into court here.

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

14. This Court has personal jurisdiction over LUS. LUS is amenable to service of summons for this action. Furthermore, personal jurisdiction over LUS in this action comports with due process. LUS has conducted and regularly conducts business within the United States and this District. LUS 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. LUS has sought protection and benefit from the laws of the State of Delaware by forming one of its United States affiliates 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.

15. LUS – 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. LUS 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. LUS 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, LUS has committed the tort of patent infringement in this District.

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