

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

NIDEC CORPORATION,

Plaintiff,

V.

SEAGATE TECHNOLOGY LLC, SEAGATE
SINGAPORE INTERNATIONAL
HEADQUARTERS PTE. LTD., and
SEAGATE TECHNOLOGY
(NETHERLANDS) B.V.,

Defendants.

C.A. No.

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Nidec Corporation (“Nidec” or “Plaintiff”), by way of Complaint against Defendants Seagate Technology LLC, Seagate Singapore International Headquarters Pte. Ltd., and Seagate Technology (Netherlands) B.V. (together “Defendants”), alleges as follows:

THE PARTIES

1. Nidec is a Japanese corporation with its principal place of business at 338 Kuzetonoshiro-cho, Minami-ku, Kyoto, Japan.

2. On information and belief, Defendant Seagate Technology LLC is a limited liability company organized and existing under the laws of the State of Delaware with its principal place of business at 47488 Kato Rd., Fremont, California 94538. On information and belief, Seagate Technology LLC may be served with process through its registered agent Corporation Trust Company, 1209 Orange St., Wilmington, DE 19801.

3. On information and belief, Defendant Seagate Singapore International Headquarters Pte. Ltd. is a Singapore corporation having a principal place of business at 7000 Ang

Mo Kio Avenue 5, Singapore 569877. On information and belief, Defendant Seagate Singapore International Headquarters Pte. Ltd. also maintains an address at Koolhovenlaan 1, 1119 NB Schiphol – Rijk, The Netherlands.

4. On information and belief, Defendant Seagate Technology (Netherlands) B.V. is a Netherlands corporation having a principal place of business at Tupolevlaan 105, 1119 PA Schiphol-Rijk, The Netherlands.

5. On information and belief, Defendants develop, manufacture, import, offer for sale, and/or sell certain products, including hard disk drives (“HDDs”), for consumers in the United States, including in the State of Delaware.

JURISDICTION AND VENUE

6. Nidec realleges and incorporates each of preceding paragraphs 1–5.

7. This patent infringement action arises under the United States Patent Laws, Title 35 U.S.C. § 100 et seq., including 35 U.S.C. § 271. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

8. On information and belief, Defendant Seagate Technology LLC has purposefully availed itself of the benefits of doing business in the District of Delaware by designing, manufacturing, distributing, promoting, marketing, selling, offering for sale, and/or importing one or more of the Seagate-branded products identified in this Complaint and deriving substantial revenue from such activities by placing those products into the stream of commerce with the expectation that they will be purchased by consumers within the District of Delaware. For example, on information and belief, Defendant Seagate Technology LLC has designed, manufactured, distributed, promoted, marketed, sold, offered for sale, and/or imported the Seagate 16TB IronWolf Pro ST16000NE000 and the Seagate 2TB BarraCuda ST2000LM015. The covers

of these products sold in the United States, and on information and belief in this District, identify Defendant Seagate Technology LLC as the manufacturer:



9. On information and belief, Defendant Seagate Singapore International Headquarters Pte. Ltd. has purposefully availed itself of the benefits of doing business in the District of Delaware by designing, manufacturing, distributing, promoting, marketing, selling, offering for sale, and/or importing one or more of the Seagate-branded products identified in this Complaint and deriving substantial revenue from such activities by placing those products into the stream of commerce with the expectation that they will be purchased by consumers within the District of Delaware. For example, on information and belief, Defendant Seagate Singapore International Headquarters Pte. Ltd. has designed, manufactured, distributed, promoted, marketed, sold, offered for sale, and/or imported the Seagate 2TB BarraCuda ST2000LM015. The cover of this product sold in the United States, and on information and belief in this District, lists Defendant

Seagate Singapore International Headquarters Pte. Ltd. with an address of Koolhovenlaan 1, 1119 NB Schiphol – Rijk, The Netherlands:



10. On information and belief, Defendant Seagate Technology (Netherlands) B.V. has purposefully availed itself of the benefits of doing business in the District of Delaware by designing, manufacturing, distributing, promoting, marketing, selling, offering for sale, and/or importing one or more of the Seagate-branded products identified in this Complaint and deriving substantial revenue from such activities by placing those products into the stream of commerce with the expectation that they will be purchased by consumers within the District of Delaware. For example, on information and belief, Defendant Seagate Technology (Netherlands) B.V. has designed, manufactured, distributed, promoted, marketed, sold, offered for sale, and/or imported the Seagate 16TB IronWolf Pro ST16000NE000. The cover of this product sold in the United

States, and on information and belief in this District, lists Defendant Seagate Technology (Netherlands) B.V. with an address of Tupolevlaan 105, 1119 PA Schiphol – Rijk, The Netherlands.



11. This Court has specific personal jurisdiction over Defendants at least because, on information and belief, they have worked in concert to establish distribution and sales channels in the United States, including in the District of Delaware, for one or more of the Seagate-branded products identified in this Complaint.

12. This Court also has general personal jurisdiction over Defendant Seagate Technology LLC because Defendant Seagate Technology LLC is a Delaware LLC, and thus resides in this district.

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