

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ACQIS LLC,
a Texas limited liability company,

Plaintiff,

v.

LENOVO GROUP LTD., a China
corporation, LENOVO PC HK
LIMITED, a China corporation, LCFC
(HEFEI) ELECTRONICS
TECHNOLOGY CO., LTD., a China
corporation, LENOVO
INTERNATIONAL INFORMATION
PRODUCTS (SHENZHEN) CO. LTD., a
China corporation, LENOVO (BEIJING)
INFORMATION TECHNOLOGY LTD.,
a China corporation, LENOVO CENTRO
TECNOLOGICO S DE R.L. DE CV, a
Mexico corporation,

Defendants.

Civil Action No. 6:20-CV-00967

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff ACQIS LLC (“Plaintiff” or “ACQIS”), by its attorneys, hereby alleges patent infringement against Defendants Lenovo Group Ltd., Lenovo PC HK Limited, LCFC (Hefei) Electronics Technology Co., Ltd., Lenovo International Information Products (Shenzhen) Co. Ltd., Lenovo (Beijing) Information Technology Co., Ltd., Lenovo Centro Tecnológico S. de R.L. de C.V (collectively “Defendants” or “Lenovo”) as follows:

INTRODUCTION

1. This is an action for patent infringement under the United States Patent Laws, 35 U.S.C. § 1 *et seq.* Beginning in the late 1990s, Dr. William Chu founded ACQIS and invented a variety of pioneering computer technologies that employed serial transmission along low voltage differential signal (LVDS) channels to dramatically increase the speed at which data can be transmitted while also reducing power consumption and noise. Dr. Chu’s inventions have become foundational in the computer industry, and are found in a variety of data transmission systems, including PCI Express (PCIe) and/or USB 3.x¹ transactions.

2. Lenovo has infringed and continues to infringe, directly and/or indirectly, the following patents owned by ACQIS: U.S. Patent Nos. 9,529,768 (“768 patent”), 9,703,750 (“750 patent”), 8,756,359 (“359 patent”), 8,626,977 (“977 patent”), RE44,739 (“739 patent”), 8,977,797 (“797 patent”), 9,529,769 (“769 patent”), RE45,140 (“140 patent”), and RE44,654 (“654 patent”) (collectively, the “ACQIS Patents”). Copies of the ACQIS Patents are attached to this Complaint as Exhibits 1-9.

3. Specifically, Lenovo has directly and/or indirectly infringed and continues to infringe the ACQIS Patents through: (1) the manufacture, use, offering to sale, and/or sale in the United States, and/or the importation into the United States, of infringing Lenovo-brand computer products; (2) the practice of claimed methods of the ACQIS Patents by manufacturing, using and/or testing Lenovo-brand computer products in the United States; (3) the importation into the United States of Lenovo-brand computer products made abroad using ACQIS’s patented processes; and (4) the inducement of third parties to engage in the activity described above with knowledge of the ACQIS Patents and of the third parties’ infringing actions.

¹ As used herein, “USB 3.x” refers to USB 3.0 and subsequent versions, including USB 3.1, USB 3.2, and any other subsequent versions.

4. ACQIS seeks damages and other relief for Lenovo's infringement of the ACQIS Patents. ACQIS is entitled to past damages because, without limitation, it has provided actual notice to Lenovo and for method claims which do not require marking.

THE PARTIES

5. Plaintiff ACQIS LLC, is a limited liability company organized and existing under the laws of the State of Texas, with offices at 411 Interchange Street, McKinney, Texas 75071. A related entity, ACQIS Technology, Inc., is a corporation organized under the laws of the State of Delaware, having its principal place of business at 1503 Grant Road, Suite 100, Mountain View, California 94040. ACQIS LLC is operated from California, where its President, Dr. William Chu, resides. Dr. Chu is also the Chief Executive Officer of ACQIS Technology, Inc.

6. Lenovo Group Limited is a Chinese company with its principal place of business in Hong Kong at 23rd Floor, Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong Island, Hong Kong S.A.R. Lenovo Group Limited is the parent company of a multinational conglomerate that operates under the name "Lenovo" and is a global leader in the personal and business computer market. Lenovo purports to be a US\$50 billion Fortune Global 500 company, with 63,000 employees and operating in 180 markets around the world.

7. Lenovo PC HK Limited is a wholly-owned subsidiary of Lenovo Group Limited and a Chinese company with its principal place of business in Hong Kong at 23rd Floor, Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong Island, Hong Kong S.A.R. Lenovo PC HK Limited is listed on at least one infringing Lenovo-brand product and on various manufacturing certification certificates applicable to products sold in the United States. Lenovo Group Limited's 2019/2020 Annual Report indicates that Lenovo PC HK Limited distributes IT products.

8. LCFC (Hefei) Electronics Technology Co., Ltd. is a wholly-owned subsidiary of Lenovo Group Limited and a Chinese company with a manufacturing center at NO.1-3188, Yungu Road, Hefei Export Processing Zone, Anhui Province Hefei, China. Publicly available import data indicates that LCFC (Hefei) Electronics Technology Co., Ltd. imports notebook computers into the United States. Lenovo Group Limited's 2019/2020 Annual Report indicates that LCFC (Hefei) Electronics Technology Co., Ltd. manufactures and distributes IT products.

9. Lenovo International Information Products (Shenzhen) Co. Ltd., a Chinese company, 1/#1 Great Wall Technology Building Science & Industry Park, Nanshan District. Shenzhen, China 518057. Publicly available import data indicates that Lenovo International Information Products (Shenzhen) Co. Ltd., is a prolific importer of Lenovo products, including laptop and desktop computers, into the United States.

10. Lenovo (Beijing) Information Technology Ltd. is a wholly-owned subsidiary of Lenovo Group Limited and is a Chinese company with its principal place of business at 3406 Room in No. 6 Chuangye Road, Shangdi Information Industry Base, Haidan District, Beijing China, 100085. It is listed as a manufacturer of Lenovo products on various manufacturing certification certificates applicable to products sold in the United States. Lenovo Group Limited's 2019/2020 Annual Report indicates that Lenovo (Beijing) Information Technology Ltd. distributes IT products.

11. Lenovo Centro Tecnológico S. de R.L. de C.V is a Mexican company with its principal place of business at No. 316, Boulevard Escobedo Apodaca, Technology Park Apodaca, Nuevo Leon, P.O. 66600, México. It is listed as Lenovo's Monterrey, México manufacturing center on the Lenovo website. Publicly available import data indicates that Lenovo Centro Tecnológico is a prolific importer of Lenovo products, including desktop computers, into the

United States and specifically into Houston, Texas. A Lenovo-brand ThinkStation P330 SFF desktop and Lenovo ThinkSystem SR650 server which were purchased in the U.S. and delivered to this District are both marked as “Made in Mexico” with the ThinkStation P330 SFF specifically labeled as “Made in Monterrey.”

12. Defendants are part of the same corporate structure and distribution chain (together with other Lenovo subsidiaries, affiliates, and intermediaries) with respect to the manufacture, use, offering to sell, and/or sale of infringing Lenovo-brand computer products and with respect to the importation into the United States of infringing Lenovo-brand computer products and of Lenovo-brand computer products made abroad using patented processes claimed in the ACQIS Patents.

JURISDICTION AND VENUE

13. This is an action for patent infringement under the United States patent laws, 35 U.S.C. § 101 *et seq.*

14. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

15. This Court has personal jurisdiction over the Defendants consistent with the requirements of the Due Process Clause of the United States Constitution and the Texas Long Arm Statute. On information and belief, Defendants have purposefully manufactured and/or distributed Lenovo-brand computer products that infringe the ACQIS Patents, or that were made abroad using patented processes claimed in the ACQIS Patents, through established distribution channels with the expectation that those products would be sold in the United States, State of Texas, and in this District. Further, Defendants have (themselves and/or through the activities of subsidiaries, affiliates, or intermediaries) committed and continue to commit acts of patent infringement in the

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.