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RICHARD W. BIERING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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12 Attorneys for Plaintiff
13 APPLE INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

JCS

16
17 APPLE INC.,
18 Plaintiff,
19 vs.
20 BRILLIANT STORE, INC.,
SUNVALLEYTEK
21 INTERNATIONAL, INC., and
HOOTOO.COM INC.
22 Defendants.
23

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CASE NO. 10 2996
COMPLAINT FOR DESIGN
PATENT INFRINGEMENT
-and-
DEMAND FOR JURY TRIAL

1 including at least suvalleytek.com, sunvalleyus.com, usadapter.com,
 2 makeqian.com, papatek.com, and babatek.com, through which it sells knock-off
 3 power adapters for use with genuine Apple portable computers.

4 12. Upon information and belief, defendant HTI operates websites,
 5 including at least hootoo.com, through which it has offered for sale knock-off
 6 power adapters for use with genuine Apple portable computers.

7 13. Defendants are selling and/or have offered to sell knock-off power
 8 adapters in various power configurations that infringe the '310 Patent. For
 9 example, the images below of the Defendants' 60 Watt power adapters illustrate
 10 that they are substantially the same in appearance as Apple's patented design. The
 11 images depict the adapters sold or offered for sale through the Defendants'
 12 websites, and the numbered figures next to the images are from the '310 Patent.

'310 Patent Compared to BSI's 60 Watt Power Adapter

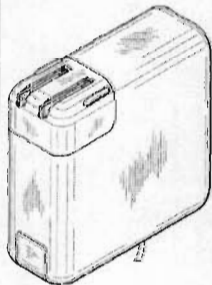


FIG. 1

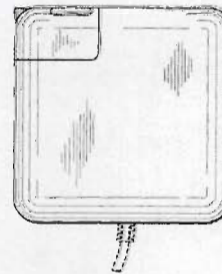


FIG. 2

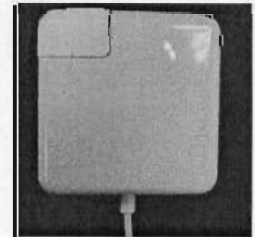


FIG. 3

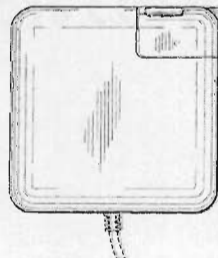
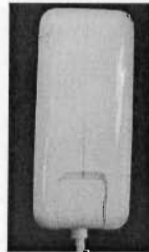


FIG. 4

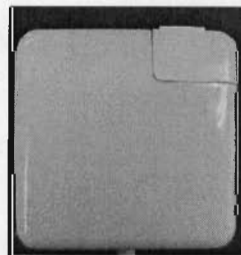


FIG. 5

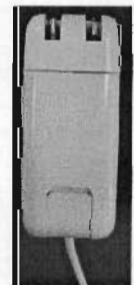


FIG. 6



FIG. 7



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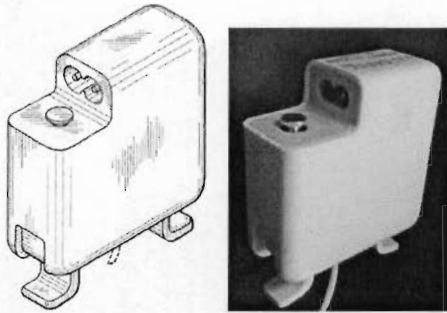


FIG. 8

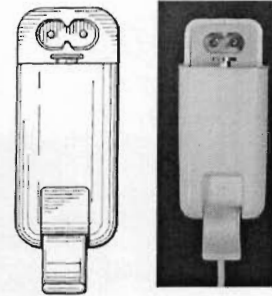


FIG. 9

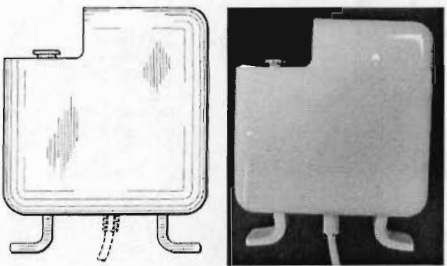


FIG. 10

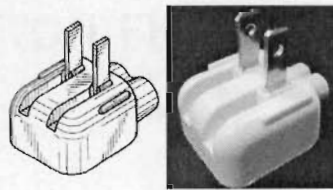


FIG. 11

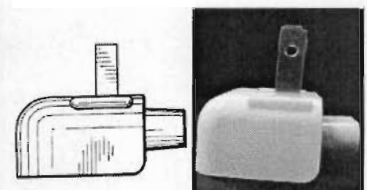


FIG. 12

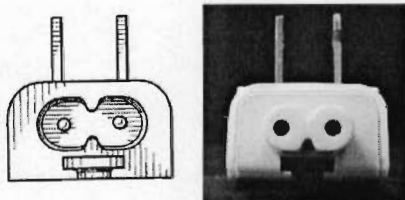


FIG. 13

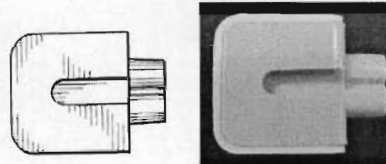


FIG. 14

'310 Patent Compared to SVT's 60 Watt Power Adapter

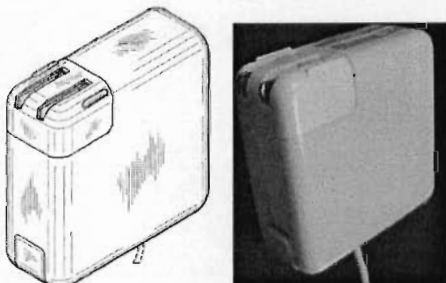


FIG. 1

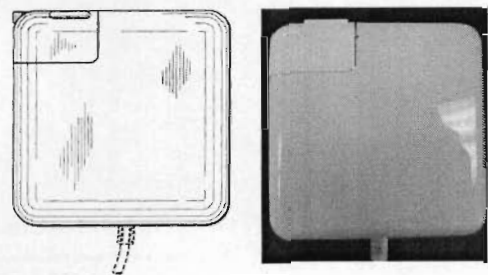


FIG. 2

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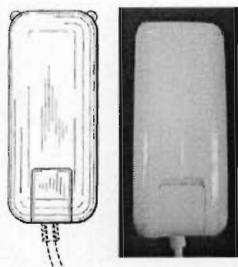


FIG. 3

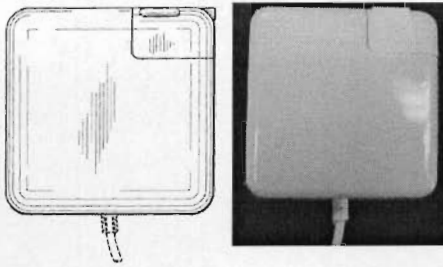


FIG. 4

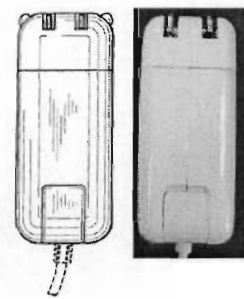


FIG. 5

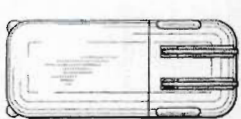


FIG. 6

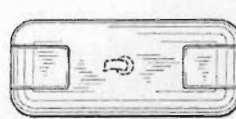
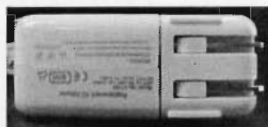


FIG. 7

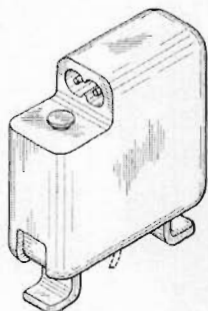
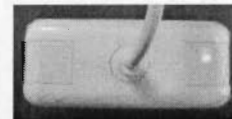


FIG. 8

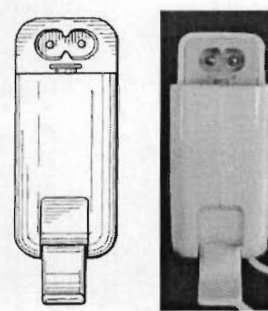
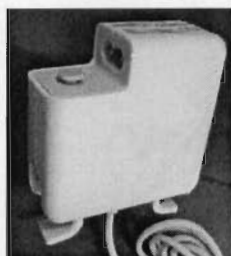


FIG. 9

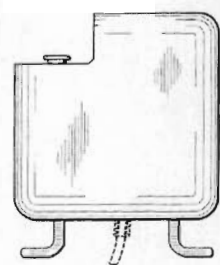


FIG. 10

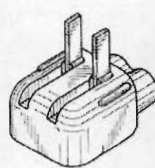


FIG. 11

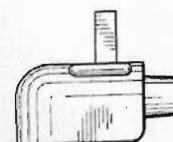


FIG. 12

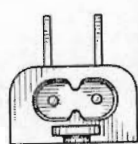


FIG. 13

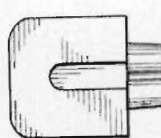
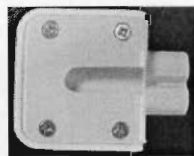


FIG. 14



1 any of them, enjoining them from continued acts of infringement of U.S. Patent
2 No. D478,310;

3 E. Such other and further relief as the Court deems just and equitable.
4

5 Dated: July 8, 2010

MUNGER, TOLLES & OLSON LLP
SAIDMAN DESIGNLAW GROUP, LLC

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8 By: Gregory Stone / AWS
9 Gregory P. Stone
10 Attorneys for Plaintiff APPLE INC.
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JURY TRIAL DEMANDED

Pursuant to Federal Rule of Civil Procedure 38(b), Apple demands a trial by jury on all matters and issues triable by jury.

Dated: July 8, 2010

**MUNGER, TOLLES & OLSON LLP
SAIDMAN DESIGNLAW GROUP, LLC**

By: Gregory Stone / AWS
Gregory P. Stone
Attorneys for Plaintiff APPLE INC.

Exhibit A

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COTTON FIBER



US00D478310S

(12) **United States Design Patent** (10) Patent No.: **US D478,310 S**
 Andre et al. (45) Date of Patent: **** Aug. 12, 2003**

(54) **POWER ADAPTER**

(75) Inventors: **Bartley K. Andre**, Menlo Park, CA (US); **Daniel J. Coster**, San Francisco, CA (US); **Daniele De Iulius**, San Francisco, CA (US); **Richard P. Howarth**, San Francisco, CA (US); **Jonathan P. Iye**, San Francisco, CA (US); **Steve Jobs**, Palo Alto, CA (US); **Duncan Robert Kerr**, San Francisco, CA (US); **Matthew Dean Rohrbach**, San Francisco, CA (US); **Douglas B. Satzger**, San Carlos, CA (US); **Calvin Q. Seid**, Palo Alto, CA (US); **Christopher J. Stringer**, Pacifica, CA (US); **Eugene Anthony Whang**, San Francisco, CA (US)

(73) Assignee: **Apple Computer, Inc.**, Cupertino, CA (US)

(**) Term: **14 Years**

(21) Appl. No.: **29/145,957**

(22) Filed: **Jul. 31, 2001**

(51) **LOC (7) Cl.** **13-02**

(52) **U.S. Cl.** **D13/110**

(58) **Field of Search** **D13/110, 107; 439/172-173, 500; 363/146; 320/107**

(56) **References Cited**

U.S. PATENT DOCUMENTS

5,019,767 A *	5/1991	Shirai et al.	320/112
D383,115 S *	9/1997	Nagele et al.	D13/110
5,684,689 A *	11/1997	Hahn	363/146
6,086,395 A *	7/2000	Lloyd et al.	439/172

OTHER PUBLICATIONS

U.S. Design patent application Ser. No. 29/153,133, by Andre et al., entitled "POWER ADAPTER," filed Oct. 22, 2001.

(List continued on next page.)

Primary Examiner—Holly Baynham
 (74) *Attorney, Agent, or Firm*—Beyer Weaver & Thomas, LLP

(57) **CLAIM**

We claim the ornamental design for a power adapter, substantially as shown and described.

DESCRIPTION

FIG. 1 is a perspective view of a power adapter in accordance with the present design.

FIG. 2 is a right side view for the power adapter shown in FIG. 1.

FIG. 3 is a rear view for the power adapter shown in FIG. 1.

FIG. 4 is a left side view for the power adapter shown in FIG. 1.

FIG. 5 is a front view for the power adapter shown in FIG. 1.

FIG. 6 is a top view for the power adapter shown in FIG. 1.

FIG. 7 is a bottom view for the power adapter shown in FIG. 1.

FIG. 8 is a perspective view of the power adapter with an adapter element removed and feet extended in accordance with the present design.

FIG. 9 is a front view for the power adapter shown in FIG. 8.

FIG. 10 is a right side view for the power adapter shown in FIG. 8.

FIG. 11 is a perspective view of the adapter element of the power adapter.

FIG. 12 is a side view of the adapter element of the power adapter shown in FIG. 11.

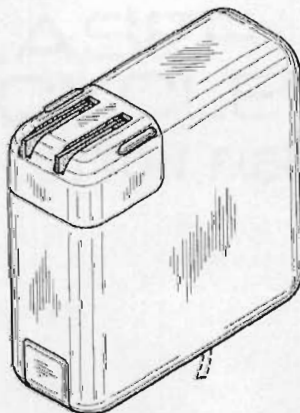
FIG. 13 is a front view of the adapter element of the power adapter shown in FIG. 11; and,

FIG. 14 is a bottom view of the adapter element of the power adapter shown in FIG. 11.

The broken line showing of a partial cord is for illustrative purposes only and forms no part of the claimed design.

The adapter element is shown detached in FIGS. 11-14 for clarity of illustration.

1 Claim, 4 Drawing Sheets



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Page 2

OTHER PUBLICATIONS

U.S. Design patent application Ser. No. 29/153,988, by Andre et al., entitled "ADAPTER PLUG," filed Oct. 22, 2001.

U.S. Design patent application Ser. No. 29/159,757, by Andre et al., entitled "ADAPTER," filed Apr. 24, 2002.

* cited by examiner

U.S. Patent

Aug. 12, 2003

Sheet 1 of 4

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FIG. 1

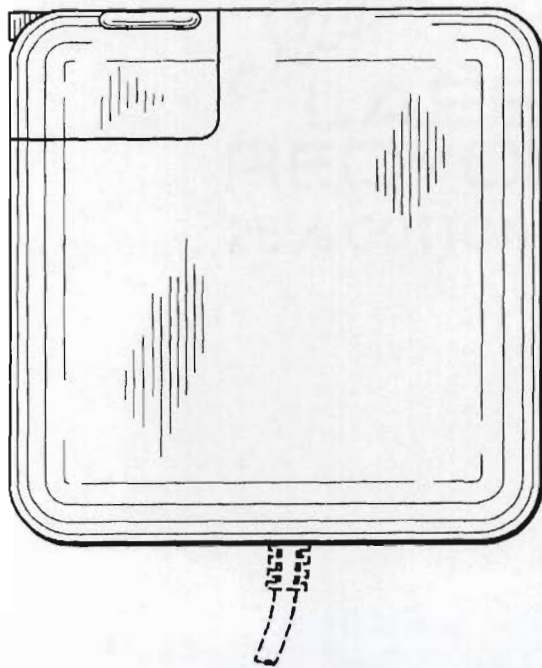
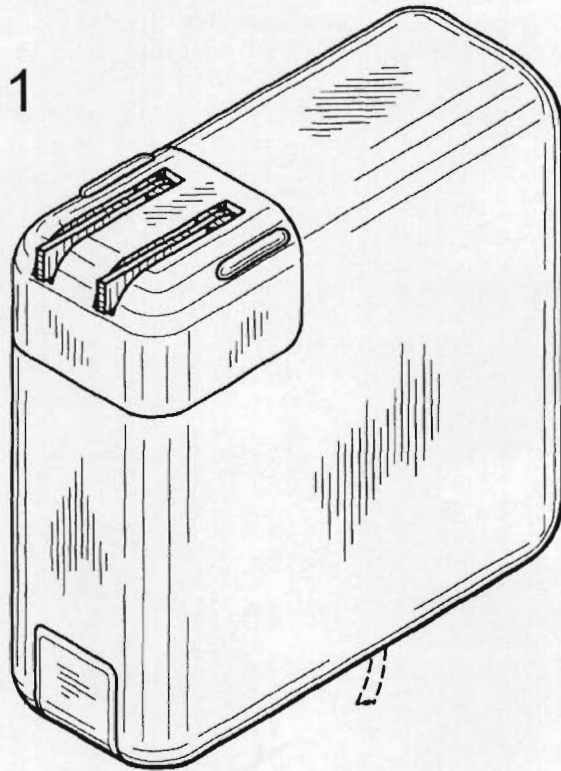


FIG. 2

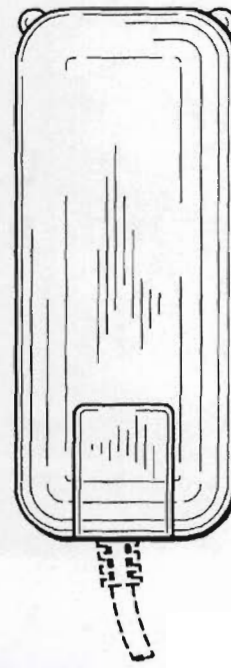


FIG. 3

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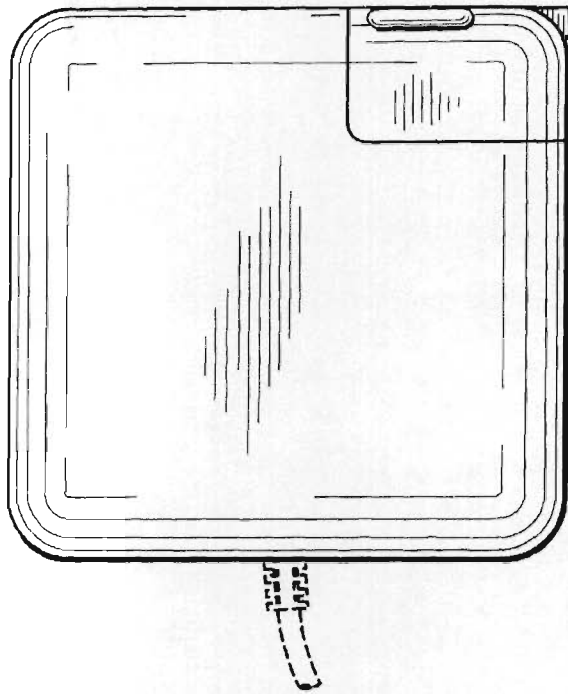


FIG. 4

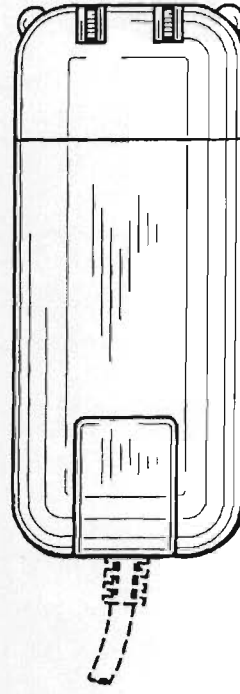


FIG. 5

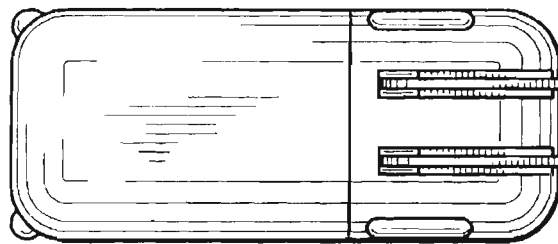


FIG. 6

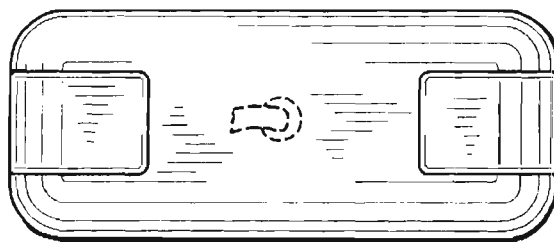


FIG. 7

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FIG. 8

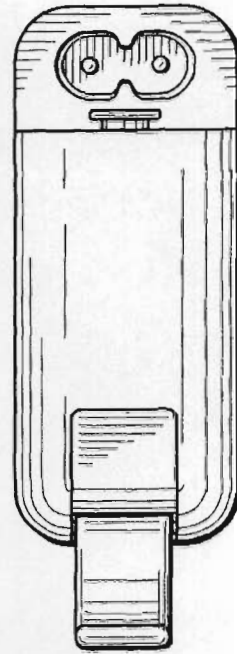
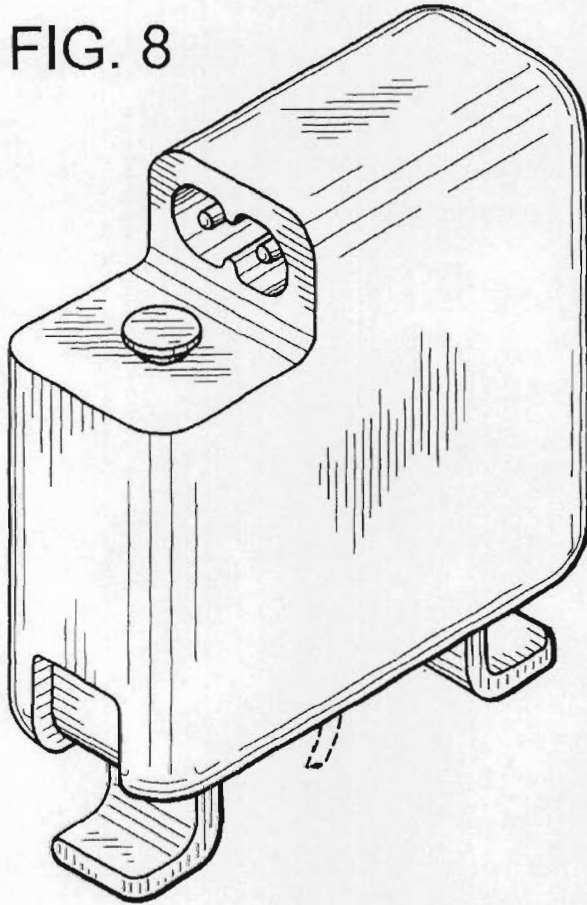
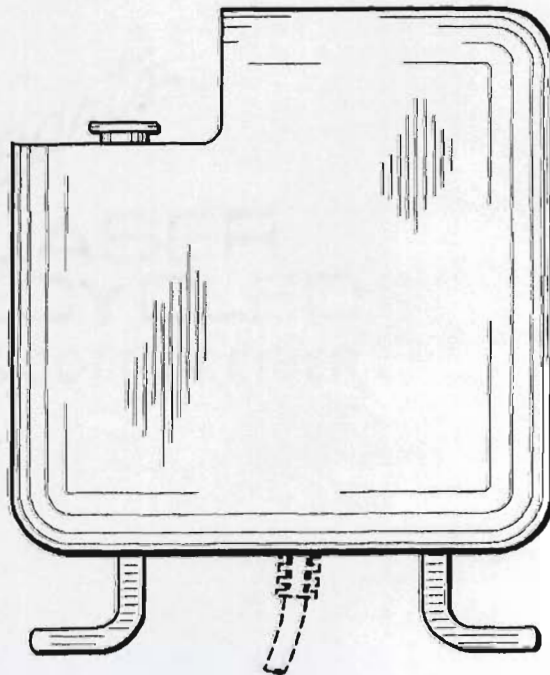


FIG. 9

FIG. 10



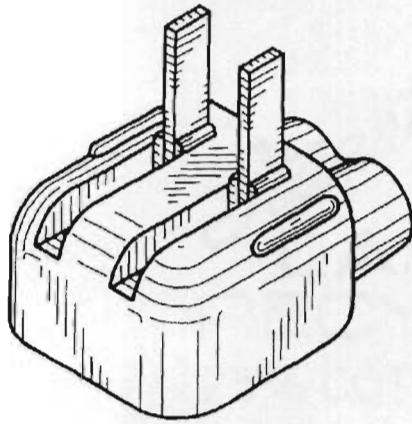


FIG. 11

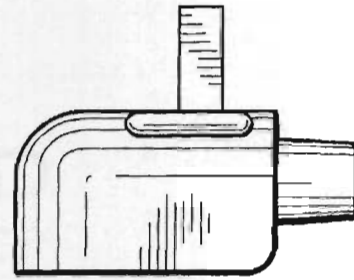


FIG. 12

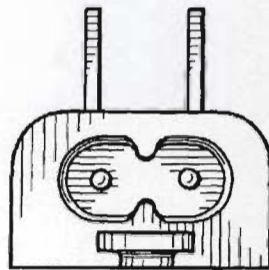


FIG. 13

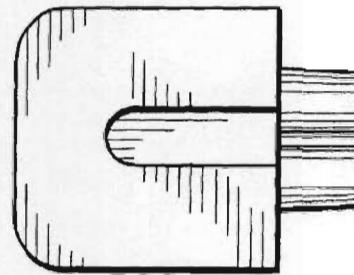


FIG. 14