

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

NOKIA CORPORATION, NOKIA INC., and
INTELLISYNC CORPORATION,

Plaintiffs,

v.

VIEWSONIC CORPORATION,

Defendant.

Civil Action No.

JURY TRIAL DEMANDED

COMPLAINT

Plaintiffs Nokia Corporation, Nokia Inc., and Intellisync Corporation (collectively “Nokia”), for their Complaint against Defendant Viewsonic Corporation (“Viewsonic”), hereby allege as follows:

The Parties

1. Plaintiff Nokia Corporation is a company organized under the laws of Finland, with its principal place of business at Keilalahdentie 4, P.O. Box 226, Espoo, Finland.
2. Plaintiff Nokia Inc. is a corporation existing under the laws of the State of Delaware, with its principal place of business in Sunnyvale, California. Nokia Inc. is a wholly-owned subsidiary of Nokia Corporation.
3. Plaintiff Intellisync Corporation is a corporation existing under the laws of the State of California, with its principal place of business in Sunnyvale, California. Intellisync Corporation is a wholly-owned subsidiary of Nokia Inc.

4. Defendant Viewsonic Corporation is corporation organized and existing under the laws of Delaware, with its principal place of business at 381 Brea Canyon Road, Walnut, California 91789.

Nature Of The Action

5. This is a civil action for infringement of nine United States patents, arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

Jurisdiction And Venue

6. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b) and (c), and 1400(b), because Viewsonic resides in this district, is subject to personal jurisdiction in this district, and has committed acts of infringement in this district.

The Patents-In-Suit

8. United States Patent No. 5,570,369 (“the ’369 patent”), entitled “Reduction of Power Consumption in a Mobile Station,” was duly and legally issued by the United States Patent and Trademark Office on October 29, 1996. A copy of the ’369 patent is attached hereto as Exhibit A.

9. United States Patent No. 5,884,190 (“the ’190 patent”), entitled “Method for Making a Data Transmission Connection From a Computer to a Mobile Communication Network for Transmission of Analog and/or Digital Signals,” was duly and legally issued by the United States Patent and Trademark Office on March 16, 1999. A copy of the ’190 patent is attached hereto as Exhibit B.

10. United States Patent No. 6,141,664 (“the ’664 patent”), entitled “Synchronization Of Databases With Date Range,” was duly and legally issued by the United States Patent and Trademark Office on October 31, 2000. The ’664 was amended by the ex parte reexamination certificate issued on November 25, 2005. A copy of the ’664 patent and the reexamination certificate are attached hereto as Exhibit C.

11. United States Patent No. 6,188,909 (“the ’909 patent”), entitled “Communication Network Terminal Supporting A Plurality Of Applications,” was duly and legally issued by the United States Patent and Trademark Office on February 13, 2001. A copy of the ’909 patent is attached hereto as Exhibit D.

12. United States Patent No. 6,212,529 (“the Boothby ’529 patent”), entitled “Synchronization Of Databases Using Filters,” was duly and legally issued by the United States Patent and Trademark Office on April 3, 2001. A copy of the Boothby ’529 patent is attached hereto as Exhibit E.

13. United States Patent No. 6,728,530 (“the ’530 patent”), entitled “Calendar-Display Apparatus, and Associated Method, for a Mobile Terminal,” was duly and legally issued by the United States Patent and Trademark Office on April 27, 2004. A copy of the ’530 patent is attached hereto as Exhibit F.

14. United States Patent No. 7,106,293 (“the ’293 patent”), entitled “Lighting Control Method And Electronic Device,” was duly and legally issued by the United States Patent and Trademark Office on September 12, 2006. A copy of the ’293 patent is attached hereto as Exhibit G.

15. United States Patent No. 7,209,911 (“the ’911 patent”), entitled “Synchronization Of Databases Using Filters,” was duly and legally issued by the United States Patent and Trademark Office on April 24, 2007. A copy of the ’911 patent is attached hereto as Exhibit H.

16. United States Patent No. 7,366,529 (“the Alanara ’529 patent”), entitled “Communication Network Terminal Supporting A Plurality Of Applications,” was duly and legally issued by the United States Patent and Trademark Office on April 29, 2008. A copy of the Alanara ’529 patent is attached hereto as Exhibit I.

17. The ’369 patent, ’190 patent, ’664 patent, ’909 patent, Boothby ’529 patent, ’530 patent, ’293 patent, ’911 patent, and Alanara ’529 patent are collectively referred to herein as the “patents-in-suit.”

18. Nokia Corporation is the assignee of the ’369 patent, ’190 patent, ’909 patent, ’530 patent, ’293 patent, and Alanara ’529 patent. Nokia Inc. is an exclusive licensee of the ’369 patent, ’190 patent, ’909 patent, ’530 patent, ’293 patent, and Alanara ’529 patent.

19. Intellisync Corporation is the assignee of the ’664 patent, Boothby ’529 patent and ’911 patent.

20. Nokia has the right to bring this suit and to recover damages for any current, future, or past infringement of each of the patents-in-suit.

COUNT I

Infringement Of The ’369 Patent

21. Paragraphs 1 through 20 are incorporated by reference as if fully stated herein.

22. The ’369 patent is valid and enforceable.

23. Viewsonic has infringed, and continues to infringe, one or more claims of the ’369 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by

making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products and/or methods encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing tablet computers, including but not limited to the Viewsonic ViewPad 7.

24. Third parties, including Viewsonic's customers, have infringed, and continue to infringe, one or more claims of the '369 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, tablet computers supplied by Viewsonic, including the Viewsonic ViewPad 7.

25. Viewsonic has had knowledge of and notice of the '369 patent and its infringement at least since the filing of this complaint. Viewsonic also has had knowledge of and notice of the '369 patent and its infringement at least since May 2, 2012, through a letter sent by Nokia to Viewsonic on May 2, 2012 concerning the '369 patent and its infringement.

26. Viewsonic has induced infringement, and continues to induce infringement, of one or more claims of the '369 patent under 35 U.S.C. § 271(b). Viewsonic actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '369 patent by selling or otherwise supplying tablet computers; with the knowledge and specific intent that third parties will use, sell, offer for sale, and/or import the tablet computers supplied by Viewsonic to infringe the '369 patent; and with the knowledge and specific intent to encourage and facilitate the infringement through the dissemination of the tablet computers and/or the creation and dissemination of promotional and marketing materials, supporting materials, instructions, product manuals, and/or technical information related to the tablet computers.

27. Viewsonic has contributed to the infringement by third parties, including Viewsonic's customers, and continues to contribute to infringement by third parties, of one or more claims of the '369 patent under 35 U.S.C. § 271(c), by selling and/or offering for sale in the United States, and/or importing into the United States, tablet computers, knowing that those products constitute a material part of the inventions of the '369 patent, knowing that those products are especially made or adapted to infringe the '369 patent, and knowing that those products are not staple articles of commerce suitable for substantial noninfringing use.

28. Nokia has been and continues to be damaged by Viewsonic's infringement of the '369 patent.

29. Nokia has been irreparably harmed by Viewsonic's infringement of the '369 patent. Unless and until Viewsonic's continued acts of infringement are enjoined, Nokia will suffer further irreparable harm for which there is no adequate remedy at law.

30. Viewsonic's conduct in infringing the '369 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT II

Infringement Of The '190 Patent

31. Paragraphs 1 through 30 are incorporated by reference as if fully stated herein.

32. The '190 patent is valid and enforceable.

33. Viewsonic has infringed, and continues to infringe, one or more claims of the '190 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by practicing every step of those claims in the United States, including for example, by using tablet computers, including but not limited to the Viewsonic ViewPad 7.

34. Third parties, including Viewsonic's customers, have infringed, and continue to infringe, one or more claims of the '190 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by practicing every step of those claims in the United States by using tablet computers supplied by Viewsonic, including the Viewsonic ViewPad 7.

35. Viewsonic has had knowledge of and notice of the '190 patent and its infringement at least since the filing of this complaint. Viewsonic also has had knowledge of and notice of the '190 patent and its infringement since May 2, 2012, through a letter sent by Nokia to Viewsonic on May 2, 2012 concerning the '190 patent and its infringement.

36. Viewsonic has induced infringement, and continues to induce infringement, of one or more claims of the '190 patent under 35 U.S.C. § 271(b). Viewsonic actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '190 patent by selling or otherwise supplying tablet computers; with the knowledge and specific intent that third parties will use the tablet computers supplied by Viewsonic to infringe the '190 patent; and with the knowledge and intent to encourage and facilitate the infringement through the dissemination of the tablet computers and/or the creation and dissemination of promotional and marketing materials, supporting materials, instructions, product manuals, and/or technical information related to the tablet computers.

37. Viewsonic has contributed to the infringement by third parties, including Viewsonic's customers, and continues to contribute to infringement by third parties, of one or more claims of the '190 patent under 35 U.S.C. § 271(c), by selling and/or offering for sale in the United States, and/or importing into the United States, tablet computers, knowing that those products constitute a material part of the inventions of the '190 patent, knowing that those

products are especially made or adapted to infringe the '190 patent, and knowing that those products are not staple articles of commerce suitable for substantial noninfringing use.

38. Nokia has been and continues to be damaged by Viewsonic's infringement of the '190 patent.

39. Nokia has been irreparably harmed by Viewsonic's infringement of the '190 patent. Unless and until Viewsonic's continued acts of infringement are enjoined, Nokia will suffer further irreparable harm for which there is no adequate remedy at law.

40. Viewsonic's conduct in infringing the '190 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT III

Infringement Of The '664 Patent

41. Paragraphs 1 through 40 are incorporated by reference as if fully stated herein.

42. The '664 patent is valid and enforceable.

43. Viewsonic has infringed, and continues to infringe, one or more claims of the '664 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products and/or methods encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing tablet computers, including but not limited to the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

44. Third parties, including Viewsonic's customers, have infringed, and continue to infringe, one or more claims of the '664 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United

States, and/or importing into the United States, tablet computers supplied by Viewsonic, including the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

45. Viewsonic has had knowledge of and notice of the '664 patent and its infringement at least since the filing of this complaint. Viewsonic also has had knowledge of and notice of the '664 patent and its infringement at least since May 2, 2012, through a letter sent by Nokia to Viewsonic on May 2, 2012 concerning the '664 patent and its infringement.

46. Viewsonic has induced infringement, and continues to induce infringement, of one or more claims of the '664 patent under 35 U.S.C. § 271(b). Viewsonic actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '664 patent by selling or otherwise supplying tablet computers; with the knowledge and specific intent that third parties will use, sell, offer for sale, and/or import the tablet computers supplied by Viewsonic to infringe the '664 patent; and with the knowledge and specific intent to encourage and facilitate the infringement through the dissemination of the tablet computers and/or the creation and dissemination of promotional and marketing materials, supporting materials, instructions, product manuals, and/or technical information related to the tablet computers.

47. Viewsonic has contributed to the infringement by third parties, including Viewsonic's customers, and continues to contribute to infringement by third parties, of one or more claims of the '664 patent under 35 U.S.C. § 271(c), by selling and/or offering for sale in the United States, and/or importing into the United States, tablet computers, knowing that those products constitute a material part of the inventions of the '664 patent, knowing that those

products are especially made or adapted to infringe the '664 patent, and knowing that those products are not staple articles of commerce suitable for substantial noninfringing use.

48. Nokia has been and continues to be damaged by Viewsonic's infringement of the '664 patent.

49. Nokia has been irreparably harmed by Viewsonic's infringement of the '664 patent. Unless and until Viewsonic's continued acts of infringement are enjoined, Nokia will suffer further irreparable harm for which there is no adequate remedy at law.

50. Viewsonic's conduct in infringing the '664 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT IV

Infringement Of The '909 Patent

51. Paragraphs 1 through 50 are incorporated by reference as if fully stated herein.

52. The '909 patent is valid and enforceable.

53. Viewsonic has infringed, and continues to infringe, one or more claims of the '909 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products and/or methods encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing tablet computers, including but not limited to the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

54. Third parties, including Viewsonic's customers, have infringed, and continue to infringe, one or more claims of the '909 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United

States, and/or importing into the United States, tablet computers supplied by Viewsonic, including the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

55. Viewsonic has had knowledge of and notice of the '909 patent and its infringement at least since the filing of this complaint. Viewsonic also has had knowledge of and notice of the '909 patent and its infringement at least since May 2, 2012, through a letter sent by Nokia to Viewsonic on May 2, 2012 concerning the '909 patent and its infringement.

56. Viewsonic has induced infringement, and continues to induce infringement, of one or more claims of the '909 patent under 35 U.S.C. § 271(b). Viewsonic actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '909 patent by selling or otherwise supplying tablet computers; with the knowledge and specific intent that third parties will use, sell, offer for sale, and/or import the tablet computers supplied by Viewsonic to infringe the '909 patent; and with the knowledge and specific intent to encourage and facilitate the infringement through the dissemination of the tablet computers and/or the creation and dissemination of promotional and marketing materials, supporting materials, instructions, product manuals, and/or technical information related to the tablet computers.

57. Viewsonic has contributed to the infringement by third parties, including Viewsonic's customers, and continues to contribute to infringement by third parties, of one or more claims of the '909 patent under 35 U.S.C. § 271(c), by selling and/or offering for sale in the United States, and/or importing into the United States, tablet computers, knowing that those products constitute a material part of the inventions of the '909 patent, knowing that those

products are especially made or adapted to infringe the '909 patent, and knowing that those products are not staple articles of commerce suitable for substantial noninfringing use.

58. Nokia has been and continues to be damaged by Viewsonic's infringement of the '909 patent.

59. Nokia has been irreparably harmed by Viewsonic's infringement of the '909 patent. Unless and until Viewsonic's continued acts of infringement are enjoined, Nokia will suffer further irreparable harm for which there is no adequate remedy at law.

60. Viewsonic's conduct in infringing the '909 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT V

Infringement Of The Boothby '529 Patent

61. Paragraphs 1 through 60 are incorporated by reference as if fully stated herein.

62. The Boothby '529 patent is valid and enforceable.

63. Viewsonic has infringed, and continues to infringe, one or more claims of the Boothby '529 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products and/or methods encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing tablet computers, including but not limited to the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

64. Third parties, including Viewsonic's customers, have infringed, and continue to infringe, one or more claims of the Boothby '529 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the

United States, and/or importing into the United States, tablet computers supplied by Viewsonic, including the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

65. Viewsonic has had knowledge of and notice of the Boothby '529 patent and its infringement at least since the filing of this complaint. Viewsonic also has had knowledge of and notice of the Boothby '529 patent and its infringement at least since May 2, 2012, through a letter sent by Nokia to Viewsonic on May 2, 2012 concerning the Boothby '529 patent and its infringement.

66. Viewsonic has induced infringement, and continues to induce infringement, of one or more claims of the Boothby '529 patent under 35 U.S.C. § 271(b). Viewsonic actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the Boothby '529 patent by selling or otherwise supplying tablet computers; with the knowledge and specific intent that third parties will use, sell, offer for sale, and/or import the tablet computers supplied by Viewsonic to infringe the Boothby '529 patent; and with the knowledge and specific intent to encourage and facilitate the infringement through the dissemination of the tablet computers and/or the creation and dissemination of promotional and marketing materials, supporting materials, instructions, product manuals, and/or technical information related to the tablet computers.

67. Viewsonic has contributed to the infringement by third parties, including Viewsonic's customers, and continues to contribute to infringement by third parties, of one or more claims of the Boothby '529 patent under 35 U.S.C. § 271(c), by selling and/or offering for sale in the United States, and/or importing into the United States, tablet computers, knowing that those products constitute a material part of the inventions of the Boothby '529 patent, knowing

that those products are especially made or adapted to infringe the Boothby '529 patent, and knowing that those products are not staple articles of commerce suitable for substantial noninfringing use.

68. Nokia has been and continues to be damaged by Viewsonic's infringement of the Boothby '529 patent.

69. Nokia has been irreparably harmed by Viewsonic's infringement of the Boothby '529 patent. Unless and until Viewsonic's continued acts of infringement are enjoined, Nokia will suffer further irreparable harm for which there is no adequate remedy at law.

70. Viewsonic's conduct in infringing the Boothby '529 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT VI

Infringement Of The '530 Patent

71. Paragraphs 1 through 70 are incorporated by reference as if fully stated herein.

72. The '530 patent is valid and enforceable.

73. Viewsonic has infringed, and continues to infringe, one or more claims of the '530 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products and/or methods encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing tablet computers, including but not limited to the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

74. Third parties, including Viewsonic's customers, have infringed, and continue to infringe, one or more claims of the '530 patent under 35 U.S.C. § 271(a), either literally and/or

under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, tablet computers supplied by Viewsonic, including the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

75. Viewsonic has had knowledge of and notice of the '530 patent and its infringement at least since the filing of this complaint. Viewsonic also has had knowledge of and notice of the '530 patent and its infringement at least since May 2, 2012, through a letter sent by Nokia to Viewsonic on May 2, 2012 concerning the '530 patent and its infringement.

76. Viewsonic has induced infringement, and continues to induce infringement, of one or more claims of the '530 patent under 35 U.S.C. § 271(b). Viewsonic actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '530 patent by selling or otherwise supplying tablet computers; with the knowledge and specific intent that third parties will use, sell, offer for sale, and/or import the tablet computers supplied by Viewsonic to infringe the '530 patent; and with the knowledge and specific intent to encourage and facilitate the infringement through the dissemination of the tablet computers and/or the creation and dissemination of promotional and marketing materials, supporting materials, instructions, product manuals, and/or technical information related to the tablet computers.

77. Viewsonic has contributed to the infringement by third parties, including Viewsonic's customers, and continues to contribute to infringement by third parties, of one or more claims of the '530 patent under 35 U.S.C. § 271(c), by selling and/or offering for sale in the United States, and/or importing into the United States, tablet computers, knowing that those products constitute a material part of the inventions of the '530 patent, knowing that those

products are especially made or adapted to infringe the '530 patent, and knowing that those products are not staple articles of commerce suitable for substantial noninfringing use.

78. Nokia has been and continues to be damaged by Viewsonic's infringement of the '530 patent.

79. Nokia has been irreparably harmed by Viewsonic's infringement of the '530 patent. Unless and until Viewsonic's continued acts of infringement are enjoined, Nokia will suffer further irreparable harm for which there is no adequate remedy at law.

80. Viewsonic's conduct in infringing the '530 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT VII

Infringement Of The '293 Patent

81. Paragraphs 1 through 80 are incorporated by reference as if fully stated herein.

82. The '293 patent is valid and enforceable.

83. Viewsonic has infringed, and continues to infringe, one or more claims of the '293 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products and/or methods encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing tablet computers, including but not limited to the Viewsonic ViewPad 7.

84. Third parties, including Viewsonic's customers, have infringed, and continue to infringe, one or more claims of the '293 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United

States, and/or importing into the United States, tablet computers supplied by Viewsonic, including the Viewsonic ViewPad 7.

85. Viewsonic has had knowledge of and notice of the '293 patent and its infringement at least since the filing of this complaint. Viewsonic also has had knowledge of and notice of the '293 patent and its infringement at least since May 2, 2012, through a letter sent by Nokia to Viewsonic on May 2, 2012 concerning the '293 patent and its infringement.

86. Viewsonic has induced infringement, and continues to induce infringement, of one or more claims of the '293 patent under 35 U.S.C. § 271(b). Viewsonic actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '293 patent by selling or otherwise supplying tablet computers; with the knowledge and specific intent that third parties will use, sell, offer for sale, and/or import the tablet computers supplied by Viewsonic to infringe the '293 patent; and with the knowledge and specific intent to encourage and facilitate the infringement through the dissemination of the tablet computers and/or the creation and dissemination of promotional and marketing materials, supporting materials, instructions, product manuals, and/or technical information related to the tablet computers.

87. Viewsonic has contributed to the infringement by third parties, including Viewsonic's customers, and continues to contribute to infringement by third parties, of one or more claims of the '293 patent under 35 U.S.C. § 271(c), by selling and/or offering for sale in the United States, and/or importing into the United States, tablet computers, knowing that those products constitute a material part of the inventions of the '293 patent, knowing that those products are especially made or adapted to infringe the '293 patent, and knowing that those products are not staple articles of commerce suitable for substantial noninfringing use.

88. Nokia has been and continues to be damaged by Viewsonic's infringement of the '293 patent.

89. Nokia has been irreparably harmed by Viewsonic's infringement of the '293 patent. Unless and until Viewsonic's continued acts of infringement are enjoined, Nokia will suffer further irreparable harm for which there is no adequate remedy at law.

90. Viewsonic's conduct in infringing the '293 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT VIII

Infringement Of The '911 Patent

91. Paragraphs 1 through 90 are incorporated by reference as if fully stated herein.

92. The '911 patent is valid and enforceable.

93. Viewsonic has infringed, and continues to infringe, one or more claims of the '911 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products and/or methods encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing tablet computers, including but not limited to the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

94. Third parties, including Viewsonic's customers, have infringed, and continue to infringe, one or more claims of the '911 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, tablet computers supplied by Viewsonic,

including the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

95. Viewsonic has had knowledge of and notice of the '911 patent and its infringement at least since the filing of this complaint. Viewsonic also has had knowledge of and notice of the '911 patent and its infringement at least since May 2, 2012, through a letter sent by Nokia to Viewsonic on May 2, 2012 concerning the '911 patent and its infringement.

96. Viewsonic has induced infringement, and continues to induce infringement, of one or more claims of the '911 patent under 35 U.S.C. § 271(b). Viewsonic actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the '911 patent by selling or otherwise supplying tablet computers; with the knowledge and specific intent that third parties will use, sell, offer for sale, and/or import the tablet computers supplied by Viewsonic to infringe the '911 patent; and with the knowledge and specific intent to encourage and facilitate the infringement through the dissemination of the tablet computers and/or the creation and dissemination of promotional and marketing materials, supporting materials, instructions, product manuals, and/or technical information related to the tablet computers.

97. Viewsonic has contributed to the infringement by third parties, including Viewsonic's customers, and continues to contribute to infringement by third parties, of one or more claims of the '911 patent under 35 U.S.C. § 271(c), by selling and/or offering for sale in the United States, and/or importing into the United States, tablet computers, knowing that those products constitute a material part of the inventions of the '911 patent, knowing that those products are especially made or adapted to infringe the '911 patent, and knowing that those products are not staple articles of commerce suitable for substantial noninfringing use.

98. Nokia has been and continues to be damaged by Viewsonic's infringement of the '911 patent.

99. Nokia has been irreparably harmed by Viewsonic's infringement of the '911 patent. Unless and until Viewsonic's continued acts of infringement are enjoined, Nokia will suffer further irreparable harm for which there is no adequate remedy at law.

100. Viewsonic's conduct in infringing the '911 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT IX

Infringement Of The Alanara '529 Patent

101. Paragraphs 1 through 100 are incorporated by reference as if fully stated herein.

102. The Alanara '529 patent is valid and enforceable.

103. Viewsonic has infringed, and continues to infringe, one or more claims of the Alanara '529 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products and/or methods encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing tablet computers, including but not limited to the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

104. Third parties, including Viewsonic's customers, have infringed, and continue to infringe, one or more claims of the Alanara '529 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, tablet computers supplied by Viewsonic,

including the Viewsonic ViewPad 7, Viewsonic ViewBook 730, Viewsonic ViewPad 7E, Viewsonic ViewPad 10, and Viewsonic ViewPad 10pro.

105. Viewsonic has had knowledge of and notice of the Alanara '529 patent and its infringement at least since the filing of this complaint. Viewsonic also has had knowledge of and notice of the Alanara '529 patent and its infringement at least since May 2, 2012, through a letter sent by Nokia to Viewsonic on May 2, 2012 concerning the Alanara '529 patent and its infringement.

106. Viewsonic has induced infringement, and continues to induce infringement, of one or more claims of the Alanara '529 patent under 35 U.S.C. § 271(b). Viewsonic actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce, infringement of the Alanara '529 patent by selling or otherwise supplying tablet computers; with the knowledge and specific intent that third parties will use, sell, offer for sale, and/or import the tablet computers supplied by Viewsonic to infringe the Alanara '529 patent; and with the knowledge and specific intent to encourage and facilitate the infringement through the dissemination of the tablet computers and/or the creation and dissemination of promotional and marketing materials, supporting materials, instructions, product manuals, and/or technical information related to the tablet computers.

107. Viewsonic has contributed to the infringement by third parties, including Viewsonic's customers, and continues to contribute to infringement by third parties, of one or more claims of the Alanara '529 patent under 35 U.S.C. § 271(c), by selling and/or offering for sale in the United States, and/or importing into the United States, tablet computers, knowing that those products constitute a material part of the inventions of the Alanara '529 patent, knowing that those products are especially made or adapted to infringe the Alanara '529 patent, and

knowing that those products are not staple articles of commerce suitable for substantial noninfringing use.

108. Nokia has been and continues to be damaged by Viewsonic's infringement of the Alanara '529 patent.

109. Nokia has been irreparably harmed by Viewsonic's infringement of the Alanara '529 patent. Unless and until Viewsonic's continued acts of infringement are enjoined, Nokia will suffer further irreparable harm for which there is no adequate remedy at law.

110. Viewsonic's conduct in infringing the Alanara '529 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

Prayer For Relief

WHEREFORE, Nokia prays for judgment as follows:

- A. That Viewsonic has infringed each of the patents-in-suit;
- B. That this Court permanently enjoin Viewsonic, its subsidiaries, affiliates, successors and assigns, and each of its officers, directors, employees, representatives, agents, and attorneys, and all persons acting in concert or active participation with, or on its behalf, or within its control, from making, using, selling, offering for sale, selling, importing, or advertising products and/or services and/or employing systems, hardware, software and/or components and/or making use of systems or processes that infringe any of the claims of the patents-in-suit;
- C. That Nokia be awarded all damages adequate to compensate it for Viewsonic's infringement of the patents-in-suit, such damages to be determined by a jury and, if necessary to adequately compensate Nokia for the infringement, an accounting,

and that such damages be awarded to Nokia with pre-judgment and post-judgment interest;

D. That this case be declared an exceptional case within the meaning of 35 U.S.C. § 285 and that Nokia be awarded the attorney fees, costs, and expenses that it incurs prosecuting this action; and

E. That Nokia be awarded such other and further relief as this Court deems just and proper.

Demand For Jury Trial

Nokia hereby demands a trial by jury on all issues so triable.

Dated: May 2, 2012

FARNAN LLP

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