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8				
9	UNITED STATES DISTRICT COURT			
10	NORTHERN DISTRICT OF CALIFORNIA			
10				
	ACROX TECHNOLOGIES CO., LTD.,	CASE NO.		
12	Plaintiff,	COMPLAINT FOR PATENT		
13	V.	INFRINGEMENT		
14	BEST BUY CO., INC.,	DEMAND FOR JURY TRIAL		
15	BEST BUY STORES, L.P., BESTBUY.COM, LLC,			
16	LOGITECH INTERNATIONAL S.A., and LOGITECH INC.,			
17	Defendants.			
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		ACROX'S COMPLAINT FOR PATENT INFRINGEMENT		

Plaintiff Acrox Technologies Co., Ltd. ("Acrox"), by and through its counsel of record, and 2 for its Complaint against Best Buy Co., Inc., Best Buy Stores, L.P., BestBuy.com, LLC ("Best Buy"), 3 and Logitech International S.A., and Logitech Inc. ("Logitech") (collectively "Defendants"), states as follows: 4 5 NATURE OF THE ACTION 1. This Complaint seeks judgment that Best Buy and Logitech have infringed and 6 7 continue to infringe Acrox's U.S. Patent No. 8,746,447 ("the '447 patent"), which relates to a 8 protector for a portable electronic device. A true and accurate copy of the '447 patent is attached 9 hereto as Exhibit A. THE PARTIES 2. Plaintiff Acrox Technologies Co., Ltd. is a corporation organized and existing under the laws of Taiwan, and has its principal place of business at 4F, No. 89, Minshan St., Neihu Dist., Taipei 114, Taiwan, R.O.C. Acrox is the owner of the '447 patent. 3. Upon information and belief, defendant Best Buy Co., Inc. is a corporation operating and existing under the laws of the state of Minnesota with its principal place of business at 7601 Penn Avenue, Richfield, Minnesota 55423. Upon information and belief, Best Buy Co., Inc. is the ultimate corporate parent of a number of entities operating generally under the Best Buy name. 4. Upon information and belief, defendant Best Buy Stores, L.P. is a limited partnership operating and existing under the laws of the state of Minnesota with its principal place of business at 7601 Penn Avenue, Richfield, Minnesota 55423. Upon information and belief, Best Buy Stores, L.P. is a subsidiary of Best Buy Co., Inc. 5. Upon information and belief, defendant BestBuy.com, LLC is a limited liability company operating and existing under the laws of the state of Minnesota with its principal place of 24 business at 7601 Penn Avenue, Richfield, Minnesota 55423. Upon information and belief, 25 BestBuy.com, LLC is a subsidiary of Best Buy Co., Inc. 26 6. Upon information and belief, defendant Logitech International S.A. is a corporation 27 operating and existing under the laws of Switzerland with its principal place of business at Rue du 28 Sablon 2-4, 1110 Morges, Switzerland. ACROX'S COMPLAINT FOR PATENT INFRINGEMENT 1

1	7.	Upon information and belief, defendant Logitech Inc. is a corporation operating and
2	existing unde	r the laws of the state of California, with its principal place of business at 7600
3	Gateway Boulevard, Newark, California 94560. Upon information and belief, Logitech Inc. is a	
4	subsidiary of	Logitech International S.A., and lists its agent for service of process as Catherine
5	Valentine, 76	00 Gateway Boulevard, Newark, California 94560.
6		JURISDICTION
7	8.	This is an action for patent infringement arising under the Patent Laws of the United
8	States, 35 U.S	S.C. § 1 et. seq.
9	9.	This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a),
10	and under the	patent laws of the United States, 35 U.S.C. § 1, et seq.
11	10.	Venue is proper in this judicial district under 28 U.S.C. §§ 1391(c) and 1400(b).
12	11.	This Court has personal jurisdiction over each of the Defendants because, upon
13	information a	nd belief, each defendant conducts substantial business in this District, directly or
14	through intermediaries, including (i) conducting one or more of the infringing acts alleged herein,	
15	and (ii) regula	arly conducting or soliciting business, engaging in other persistent courses of conduct,
16	and/or derivin	ng substantial revenue from goods and services provided to individuals in this District.
17	12.	Upon information and belief, defendant Best Buy Co., Inc. regularly maintains retail
18	stores in this	District, directly or through intermediaries, through which it offers to sell and sells
19	infringing pro	oducts, and regularly places infringing products of Logitech into the stream of
20	commerce the	rough established distribution channels with the intent or expectation that those
21	products will	be purchased by customers in this District.
22	13.	Upon information and belief, defendant Best Buy Stores, L.P. has established and
23	operates a nu	mber of brick-and-mortar stores in California, including in this District, through which
24	it regularly p	comotes, offers to sell, and sells the infringing products of Logitech to customers.
25	14.	Upon information and belief, defendant BestBuy.com, LLC regularly maintains a
26	website throu	gh which it promotes, offers to sell, and sells the infringing products of Logitech to
27	customers, in	cluding customers in the United States, California, and this District.
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15. Upon information and belief, the Logitech defendants regularly offer to sell and sell their infringing products to Best Buy and to others for promotion, sale, and distribution to end users throughout the United States, including in California and this District, with the intent or expectation that those infringing products be sold in this District.

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16. Upon information and belief, Logitech promotes, offers for sale, sells, and distributes,
through Best Buy and others, Logitech's infringing products to end users throughout the United
States, including in this District. Upon information and belief, Logitech derives substantial revenue
from its sales of infringing products to Best Buy and others in California, including in this District.
Accordingly, both Best Buy and Logitech have purposefully availed themselves of the privileges and
benefits of regularly conducting business in California and this District, and have invoked the
benefits and protections of the laws of California.

FACTS

13 17. Acrox is a leading provider of peripheral products for computers and other electronic devices. Acrox's solutions are used by leading brands and original equipment manufacturers 14 15 ("OEMs") servicing the growing markets for portable electronic devices and accessories therefor, 16 including smartphone and tablet protectors. Acrox researched extensively to design protectors and 17 the corresponding manufacturing process. In 2012, Acrox filed U.S. patent application 13/431,389, 18 which relates to protectors for portable electronic devices, which issued as the patent-in-suit in June 19 2014. (Exhibit A). Because of the significant growth and demand for Acrox's patented technology, 20 Acrox has invested in expanding its manufacturing capacity for the patented products to provide the 21 patented solution to or to manufacture products for other companies.

18. Acrox's patented invention for protectors for portable electronic devices provides
many advantages, including making the protectors stronger, durable, lighter, aesthetically appealing,
and/or cost-effective.

19. Logitech identifies itself as a leading supplier of "a wide variety of personal
peripherals," including tablet and smartphone accessories. Upon information and belief, Logitech
offers to sell and sells infringing products under its "Logitech" brand in the United States, including
in California and this District, including but not limited to the following protector products that

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1	infringe the '447 patent: Ultrathin Portfolio Keyboard Case, Ultrathin Keyboard Folio Case, Folio
2	Case, Hinge Case, Turnaround Case, Carrying Case (Folio), PRO Keyboard Case, Type S Bluetooth
3	Keyboard Case, and Keyboard Folio Case, as well as other products of the same or similar
4	configurations. Upon information and belief, Logitech offers to sell and sells at least the above-
5	identified products to, at least, Best Buy in the United States, including in this District. Logitech,
6	Best Buy, or both promote, offer to sell, and sell these infringing products to consumers in the
7	United States, including in California and in this District. Upon information and belief, Best Buy
8	also offers to sell and sells Ultrathin Portfolio Keyboard Case, Ultrathin Keyboard Folio Case, Folio
9	Case, Hinge Case, Turnaround Case, Carrying Case (Folio), PRO Keyboard Case, Type S Bluetooth
10	Keyboard Case, and Keyboard Folio Case, products of the same or similar configurations, and
11	similarly-infringing products in the United States, including in this District, under different names
12	and/or product numbers of Logitech.
13	20. The '447 patent issued on June 10, 2014. Since that time, Defendants have conducted
14	on-going acts of infringement by continuing to promote, offer to sell, and sell the infringing products
15	to customers in the United States, including in this District.
16	<u>COUNT I</u>
16	<u>COUNT I</u>
16 17	<u>COUNT I</u> <u>INFRINGEMENT OF U.S. PATENT NO. 8,746,447</u>
16 17 18	COUNT I INFRINGEMENT OF U.S. PATENT NO. 8,746,447 21. Plaintiff incorporates by reference each and every allegation set forth in paragraphs 1
16 17 18 19	COUNT I INFRINGEMENT OF U.S. PATENT NO. 8,746,447 21. Plaintiff incorporates by reference each and every allegation set forth in paragraphs 1 through 20 of this Complaint as if fully set forth and restated herein.
16 17 18 19 20	COUNT I INFRINGEMENT OF U.S. PATENT NO. 8,746,447 21. Plaintiff incorporates by reference each and every allegation set forth in paragraphs 1 through 20 of this Complaint as if fully set forth and restated herein. 22. The '447 patent, entitled "Protector for Portable Electronic Device and Method for
16 17 18 19 20 21	COUNT I INFRINGEMENT OF U.S. PATENT NO. 8,746,447 21. Plaintiff incorporates by reference each and every allegation set forth in paragraphs 1 through 20 of this Complaint as if fully set forth and restated herein. 22. The '447 patent, entitled "Protector for Portable Electronic Device and Method for Manufacturing the Same," was duly and legally issued by the United States Patent and Trademark
 16 17 18 19 20 21 22 	COUNT IINFRINGEMENT OF U.S. PATENT NO. 8,746,44721. Plaintiff incorporates by reference each and every allegation set forth in paragraphs 1through 20 of this Complaint as if fully set forth and restated herein.22. The '447 patent, entitled "Protector for Portable Electronic Device and Method forManufacturing the Same," was duly and legally issued by the United States Patent and TrademarkOffice on June 10, 2014. A true and correct copy of the '447 patent is attached as Exhibit A.
 16 17 18 19 20 21 22 23 	COUNT IINFRINGEMENT OF U.S. PATENT NO. 8,746,44721. Plaintiff incorporates by reference each and every allegation set forth in paragraphs 1through 20 of this Complaint as if fully set forth and restated herein.22. The '447 patent, entitled "Protector for Portable Electronic Device and Method forManufacturing the Same," was duly and legally issued by the United States Patent and TrademarkOffice on June 10, 2014. A true and correct copy of the '447 patent is attached as Exhibit A.23. Acrox is the sole and exclusive owner of the right, title, and interest in and to the '447
 16 17 18 19 20 21 22 23 24 	COUNT I INFRINGEMENT OF U.S. PATENT NO. 8,746,447 21. Plaintiff incorporates by reference each and every allegation set forth in paragraphs 1 through 20 of this Complaint as if fully set forth and restated herein. 22. The '447 patent, entitled "Protector for Portable Electronic Device and Method for Manufacturing the Same," was duly and legally issued by the United States Patent and Trademark Office on June 10, 2014. A true and correct copy of the '447 patent is attached as Exhibit A. 23. Acrox is the sole and exclusive owner of the right, title, and interest in and to the '447 patent, including the right to assert all causes of action arising under said patent and the right to any
 16 17 18 19 20 21 22 23 24 25 	COUNT I INFRINGEMENT OF U.S. PATENT NO. 8,746,447 21. Plaintiff incorporates by reference each and every allegation set forth in paragraphs 1 through 20 of this Complaint as if fully set forth and restated herein. 22. The '447 patent, entitled "Protector for Portable Electronic Device and Method for Manufacturing the Same," was duly and legally issued by the United States Patent and Trademark Office on June 10, 2014. A true and correct copy of the '447 patent is attached as Exhibit A. 23. Acrox is the sole and exclusive owner of the right, title, and interest in and to the '447 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.
 16 17 18 19 20 21 22 23 24 25 26 	COUNT I INFRINGEMENT OF U.S. PATENT NO. 8,746,447 21. Plaintiff incorporates by reference each and every allegation set forth in paragraphs 1 through 20 of this Complaint as if fully set forth and restated herein. 22. The '447 patent, entitled "Protector for Portable Electronic Device and Method for Manufacturing the Same," was duly and legally issued by the United States Patent and Trademark Office on June 10, 2014. A true and correct copy of the '447 patent is attached as Exhibit A. 23. Acrox is the sole and exclusive owner of the right, title, and interest in and to the '447 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it. 24. Upon information and belief, the Best Buy defendants, without authority or consent

providing or causing to be used in the United States, including in this District, products that infringe 2 the '447 patent, including but not limited to the Ultrathin Portfolio Keyboard Case, Ultrathin 3 Keyboard Folio Case, Folio Case, Hinge Case, Turnaround Case, Carrying Case (Folio), PRO Keyboard Case, Type S Bluetooth Keyboard Case, Keyboard Folio Case, other products of the same 4 5 or similar configurations, products under different names, and variants of these products.

25. The Best Buy defendants' infringement of the '447 patent has caused and continues to cause damage and irreparable harm to Plaintiff.

8 26. Upon information and belief, the Logitech defendants, without authority or consent of 9 Acrox, have directly infringed and continue to directly infringe, under 35 U.S.C. § 271(a), at least 10 claims 1, 2, and 3 of the '447 patent by making, using, offering to sell, selling, importing, and/or providing or causing to be used in the United States, including in this District, products that infringe 12 the '447 patent, including but not limited to the Ultrathin Portfolio Keyboard Case, Ultrathin 13 Keyboard Folio Case, Folio Case, Hinge Case, Turnaround Case, Carrying Case (Folio), PRO 14 Keyboard Case, Type S Bluetooth Keyboard Case, Keyboard Folio Case, other products of the same 15 or similar configurations, products under different names, and variants of these products.

27. 16 The Logitech defendants' infringement of the '447 patent has caused and continues to 17 cause damage and irreparable harm to Plaintiff.

PRAYER

19 WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in its favor and against Defendants as follows: 20

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An adjudication that the Defendants have infringed the '447 patent;

22 Β. A permanent injunction enjoining Defendants and their officers, directors, employees, 23 agents, licensees, representatives, affiliates, related companies, servants, successors and assigns, and 24 any and all persons acting in privity or in concert with any of them, from further infringing the '447 25 patent;

26 С. An award of damages to be paid by Defendants adequate to compensate Plaintiff for 27 Defendants' past infringement, and any continuing and future infringement, direct and/or indirect,

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1	through the date such judgment is entered, including interest, costs, expenses, and an accounting of	
2	all infringing acts;	
3	D. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of	
4	Plaintiff's costs and reasonable attorney's fees; and	
5	E. An award of such other and further relief as the Court deems just and proper under	
6	the circumstances.	
7	DEMAND FOR JURY TRIAL	
8	Plaintiff demands a jury trial on all matters triable to a jury.	
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10	Dated: November 7, 2014Finnegan, Henderson, Farabow, Garrett & Dunner, LLP	
11	By:/s/ Ming-Tao Yang	
12	Ming-Tao Yang (SBN 221295)	
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18	Attorneys for Plaintiff Acrox Technologies Co., Ltd.	
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