UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NEODRON LTD., Plaintiff, v. LENOVO GROUP LTD., LENOVO (UNITED STATES) INC., and MOTOROLA MOBILITY LLC, Defendants.	Case No. 5:19-cv-5644 **JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT AGAINST LENOVO GROUP LTD.,
LENOVO (UNITED STATES) INC., AND MOTOROLA MOBILITY LLC**

This is an action for patent infringement arising under the Patent Laws of the United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Neodron Ltd. ("Plaintiff" or "Neodron") makes the following allegations against Defendants Lenovo Group Ltd., Lenovo (United States) Inc., and Motorola Mobility LLC (collectively, "Defendants"):

INTRODUCTION

1.   This complaint arises from Defendants' unlawful infringement of the following United States patents owned by Neodron, each of which generally relate to touchscreen technology: United States Patent Nos. 8,102,286 ("'286 Patent"); 8,451,237 ("'237 Patent"); 8,502,547 ("'547 Patent"); 8,946,574 ("'574 Patent"); 9,086,770 ("'770 Patent"); 10,088,960 ("'960 Patent"); and 7,821,502 ("'502 Patent") (collectively, the "Asserted Patents").

2.   Touchscreen technology plays a ubiquitous and important role in countless electronic devices today. Beyond just providing greater usability to smartphones, tablets, and

notebooks, touchscreens now fill our lives in public and private spaces, from our homes and cars to the restaurants and stores we visit.

3.   But just a few decades ago, touchscreen technology could only be found in science fiction books and film. Although the underlying science behind touch technology can be traced back to the 1940s, working touchscreens were not conceived and feasible until the mid-1960s, when the first finger-driven touchscreen was invented by E.A. Johnson in 1965 at the Royal Radar Establishment in Malvern, United Kingdom. Since then, it took several generations and major technological advancements for touchscreens to achieve the level of complexity—and convenience—we see and enjoy today.

4.   Built on the fundamental breakthrough that our hands and fingers can form changes in the capacitance of electrodes and electrode-connections when they are in close proximity to them, touch technology has developed rapidly over the years. Along the way, engineers have worked tirelessly to try to overcome the limitations and roadblocks touch technology presents. From conceiving various ways to detect (and correctly ignore) unintentional touches, to minimizing signal "noise," to reducing the latency and power consumption that comes with any complex, multi-part electrical process, there have been many advances to various aspects of the technology—each building a little on a related advancement before it—to get us to the highly advanced state we enjoy today.

5.   These advancements range from fundamental ones, which make basic touch technology work, to optional improvements, which typically represent one technological option that improves aspects of the user experience and functionality of a touchscreen. This infringement action is about the latter: several patented improvements—which took years of research and millions of dollars in U.S. investments to develop, and which are infringed by Defendants' accused

products.

PARTIES

6.   Plaintiff Neodron Ltd. is an Irish company, having its principal place of business at Unit 4-5, Burton Hall Road, Sandyford, Dublin 18, D18a094. Neodron is the sole owner by assignment of all right, title, and interest in each Asserted Patent.

7.   On information and belief, Defendant Lenovo Group Ltd. is organized under the laws of the People's Republic of China, with its principal place of business is at 6 Chuang ye Road, Haidian District, Beijing 100085, China.

8.   On information and belief, Defendant Lenovo (United States) Inc., a wholly-owned subsidiary of Lenovo Group Ltd., is a corporation organized under the laws of the State of Delaware, with principal place of business at 1009 Think Place, Building One, Morrisville, North Carolina 27560.

9.   On information and belief, Defendant Motorola Mobility LLC is a Delaware limited liability company with its principal office located at 222 W. Merchandise Mart Plaza, Suite 1800, Chicago, Illinois 60654.

JURISDICTION AND VENUE

10.   This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

11.   This Court has personal jurisdiction over Defendants in this action because Defendants have committed acts within this District giving rise to this action, and have established minimum contacts with this forum such that the exercise of jurisdiction over Defendants would not offend traditional notions of fair play and substantial justice. Defendants, directly and through
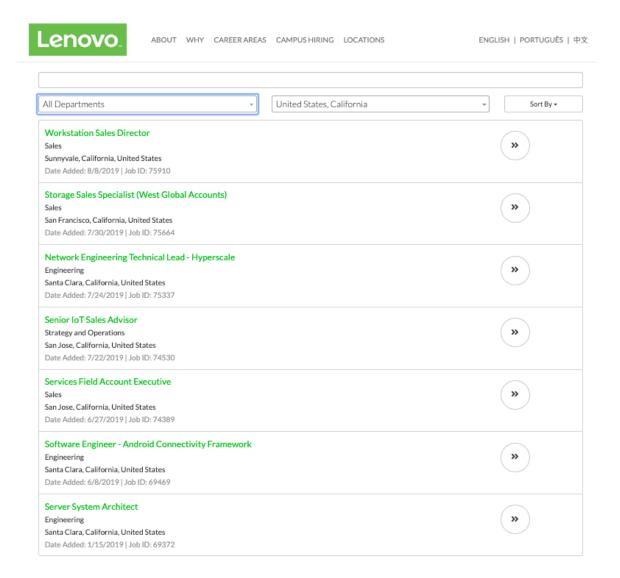
subsidiaries or intermediaries, have committed and continue to commit acts of infringement in this District by, among other things, making, using, offering to sell, selling, and importing products that infringe the Asserted Patents.

12.   Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Upon information and belief, Defendants have transacted business in this District and have committed acts of direct and indirect infringement in this District by, among other things, making, using, offering to sell, selling, and importing products that infringe the Asserted Patents. At least Lenovo (United States) Inc. is registered to do business in California, and both Lenovo (United States) Inc. and Motorola Mobility LLC maintain offices and/or employ employees in this District at 3325 Scott Boulevard, Santa Clara, California 95054. Lenovo Group Ltd. is not a resident in the United States and may be sued in any judicial district. 28 U.S.C. §§ 1391(c)(3).

13.   On information and belief, Lenovo (United States) Inc. has a regular and established place of business in the District. For example, Lenovo (United States) Inc. operates offices at 3325 Scott Boulevard, Santa Clara, California 95054. Lenovo (United States) Inc. also advertises jobs, including engineering jobs, in this District on their website, as shown below.[1]

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[1] https://lenovocareers.com/

14.   On information and belief, Motorola Mobility LLC has a regular and established place of business in the District. For example, Motorola Mobility LLC maintains offices and/or employs employees at 3325 Scott Boulevard, Santa Clara, California 95054. Motorola Mobility LLC also advertises jobs, including engineering jobs, in this District, as shown below.[2]

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[2] *See, e.g.*, https://lenovocareers.com/areas-mobile.html. Motorola Mobility LLC is a subsidiary of Lenovo Group Ltd.

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