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 13 **UNITED STATES DISTRICT COURT**
 14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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 17 NEODRON LTD.,

18 Plaintiff,

19 v.

20 MOTOROLA MOBILITY LLC.,

21 Defendant.
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Case No. 3:20-cv-01179

**COMPLAINT FOR PATENT
 INFRINGEMENT AGAINST
 MOTOROLA MOBILITY LLC**

DEMAND FOR JURY TRIAL

1 This is an action for patent infringement arising under the Patent Laws of the United States
2 of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Neodron Ltd. (“Plaintiff” or “Neodron”)
3 makes the following allegations against Defendant Motorola Mobility LLC (“Defendant”):

4 **INTRODUCTION**

5 1. This complaint arises from Defendant’s unlawful infringement of the following
6 United States patents owned by Neodron, each of which generally relate to touchscreen
7 technology: United States Patent Nos. 7,903,092 (“’092 Patent”); 8,749,251 (“’251 Patent”); and
8 9,411,472 (“’472 Patent”) (collectively, the “Asserted Patents”).

9 2. Touchscreen technology plays a ubiquitous and important role in countless
10 electronic devices today. Beyond just providing greater usability to smartphones, tablets and
11 notebooks, touchscreens now fill our lives in public and private spaces, from our homes and cars
12 to the restaurants and stores we visit.

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

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

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

7 **PARTIES**

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

11 7. On information and belief, Defendant Motorola Mobility LLC is a Delaware
 12 limited liability company with its principal office located at 222 W. Merchandise Mart Plaza, Suite
 13 1800, Chicago, Illinois 60654.

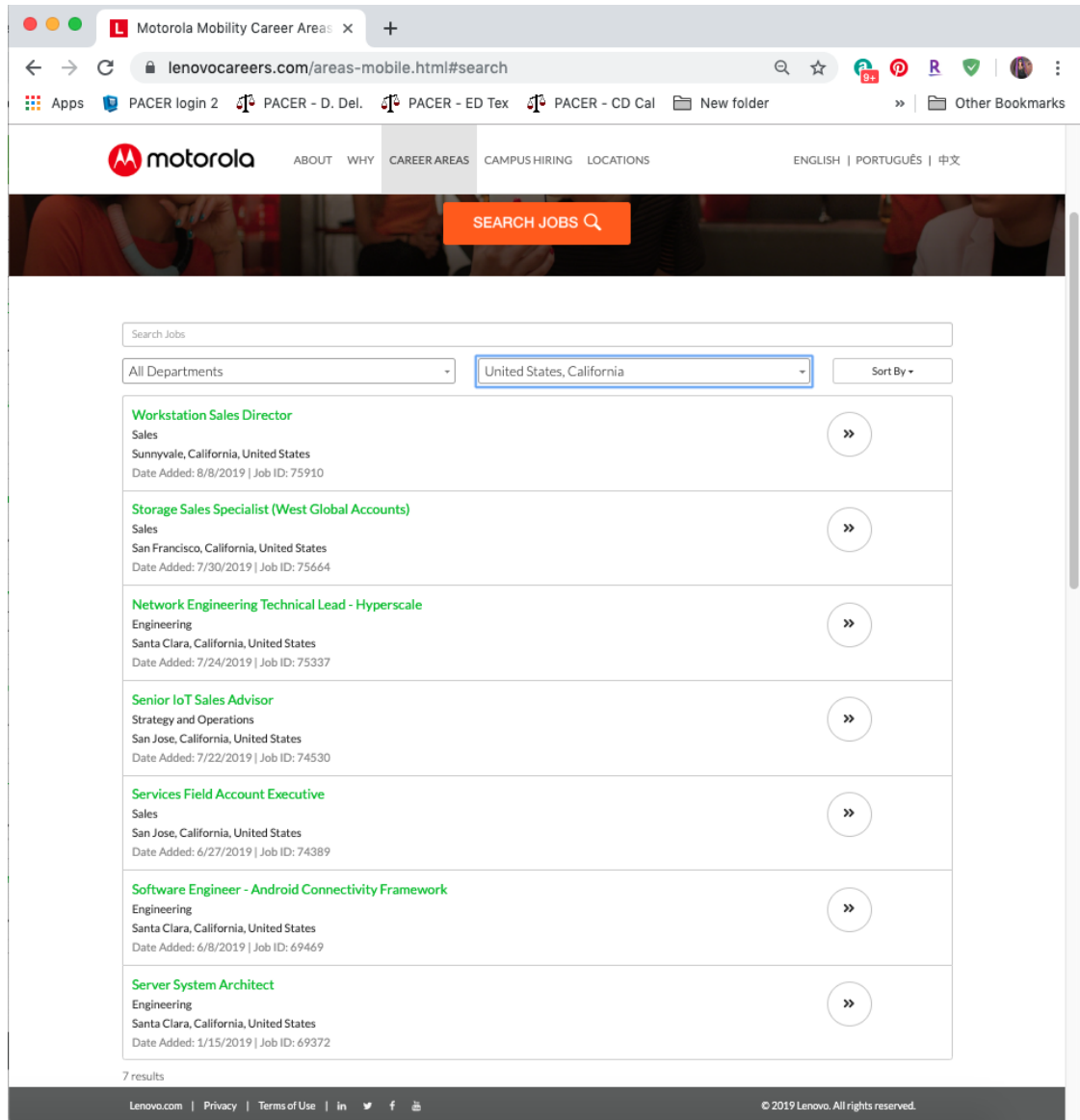
14 **JURISDICTION AND VENUE**

15 8. This action arises under the patent laws of the United States, Title 35 of the United
 16 States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and
 17 1338(a).

18 9. This Court has personal jurisdiction over Defendant in this action because
 19 Defendant has committed acts within this District giving rise to this action, and has established
 20 minimum contacts with this forum such that the exercise of jurisdiction over Defendant would not
 21 offend traditional notions of fair play and substantial justice. Defendant, directly and through
 22 subsidiaries or intermediaries, has committed and continues to commit acts of infringement in this
 23 District by, among other things, importing, offering to sell, and selling products that infringe the
 24 asserted patents.

25 10. Venue is proper in this District under 28 U.S.C. § 1400(b). On information and
 26 belief, Motorola Mobility LLC has a regular and established place of business in the District. For
 27 example, Motorola Mobility LLC maintains offices and/or employs employees at 3325 Scott
 28 Boulevard, Santa Clara, California 95054. Motorola Mobility LLC also advertises jobs, including

1 engineering jobs, in this District, as shown below.1



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21 **INTRADISTRICT ASSIGNMENT**

22
23 11. Pursuant to N.D. Cal. Local Rule 3-5(b) and 3-2(c), this civil action should be
24 assigned on a district-wide basis because it pertains to “Intellectual Property Rights.”

25 **COUNT I**

26 **INFRINGEMENT OF U.S. PATENT NO. 7,903,092**

27 12. Neodron realleges and incorporates by reference the foregoing paragraphs as if
28

1 See e.g. <https://lenovocareers.com/areas-mobile.html>

1 fully set forth herein.

2 13. Neodron owns by assignment all rights, title, and interest in U.S. Patent No.
3 7,903,092 (the “’092 Patent”), entitled “Capacitive Keyboard with Position Dependent Reduced
4 Keying Ambiguity.” The ’092 Patent was duly and legally issued by the United States Patent and
5 Trademark Office on March 8, 2011. A true and correct copy of the ’092 Patent is attached as
6 Exhibit 1.

7 14. On information and belief, Defendant makes, uses, offers for sale, sells, and/or
8 imports certain products (“Accused Products”), such as the Motorola Moto G6, that directly
9 infringe, literally and/or under the doctrine of equivalents, claims 1–14 of the ’092 Patent.

10 15. Defendant also knowingly and intentionally induces infringement of claims 1–14
11 of the ’092 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this
12 Complaint, and also through the filing and service of a complaint with the United States
13 International Trade Commission (ITC) pursuant to Section 337 of the Tariff Act of 1930, 19 U.S.C.
14 § 1337, Defendant has had knowledge of the ’092 Patent and the infringing nature of the Accused
15 Products. Despite this knowledge of the ’092 Patent, Defendant continues to actively encourage
16 and instruct its customers and end users (for example, through user manuals and online instruction
17 materials on its website) to use the Accused Products in ways that directly infringe the ’092 Patent.
18 Defendant does so knowing and intending that its customers and end users will commit these
19 infringing acts. Defendant also continues to make, use, offer for sale, sell, and/or import the
20 Accused Products, despite its knowledge of the ’092 Patent, thereby specifically intending for and
21 inducing its customers to infringe the ’092 Patent through the customers’ normal and customary
22 use of the Accused Products.

23 16. The Accused Products satisfy all claim limitations of claims 1–14 of the ’092
24 Patent. A claim chart comparing independent claims 1, 2, and 13 of the ’092 Patent to
25 representative Accused Product, the Motorola Moto G6, is attached as Exhibit 2.

26 17. By making, using, offering for sale, selling and/or importing into the United States
27 the Accused Products, Defendant has injured Neodron and is liable for infringement of the ’092
28 Patent pursuant to 35 U.S.C. § 271.

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