

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LITL LLC,

Plaintiff,

v.

DELL TECHNOLOGIES INC., and DELL
INC.,

Defendants.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff LiTL LLC (“Plaintiff” or “LiTL”) brings this action for patent infringement against Defendants Dell Technologies Inc. and Dell Inc. (collectively, “Defendants” or “Dell”).

INTRODUCTION

1. This is a civil action for patent infringement under the laws of the United States, 35 U.S.C. § 1, et seq.

2. Defendants have infringed and continue to infringe one or more claims of U.S. Patent Nos. 8,289,688 (“the ’688 patent”); 8,624,844 (“the ’844 patent”); 9,563,229 (“the ’229 patent”); 10,289,154 (“the ’154 patent”); 9,003,315 (“the ’315 patent”); 9,880,715 (“the ’715 patent”); 10,564,818 (“the ’818 patent”); and 8,612,888 (“the ’888 patent”) (collectively, the “Asserted Patents”) at least by making, using, selling, offering for sale, and importing into the United States computing devices that infringe one or more claims of each of the Asserted Patents.

3. LiTL is the legal owner by assignment of the entire right, title, and interest in and to the Asserted Patents, which were duly and legally issued by the United States Patent and

Trademark Office (“USPTO”). LiTL seeks monetary damages and injunctive relief to address past and ongoing infringement of its valuable patent portfolio.

THE PARTIES

4. Plaintiff LiTL LLC is a Delaware company, having its principal place of business at 501 Boylston Street, Boston, Massachusetts 02116.

5. Defendant Dell Technologies Inc. is a corporation organized under the laws of the State of Delaware, with a place of business at One Dell Way, Round Rock, Texas 78682.

6. Defendant Dell Inc., a subsidiary of Dell Technologies Inc., is a corporation organized under the laws of the State of Delaware, with a place of business at One Dell Way, Round Rock, Texas 78682.

JURISDICTION AND VENUE

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

8. This Court has personal jurisdiction over Dell. Defendants are subject to general personal jurisdiction in the State of Delaware because they are incorporated in the State of Delaware.

9. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Defendants are incorporated in this District. 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/or importing products that infringe the Asserted Patents.

FACTUAL BACKGROUND

LiTL's Patented Technologies

10. In 2007, John Chuang had a vision for a new type of computer. He recognized that traditional computers are designed to meet the needs of everyone from a six year old to the largest employers on earth. Mr. Chuang set out to build a computer for the home that offered a simplified operating environment. Mr. Chuang founded LiTL and assembled a team of hardware and software engineers and user interface designers to achieve his vision.

11. LiTL developed a webbook, a portable computing device, which launched in 2009. LiTL focused on how a family typically uses the Internet in the home, and optimized the webbook's user interface for consuming Internet content.





<http://web.archive.org/web/20091204052449/http://www.litl.com/essays/hardware.htm>

12. The webbook provided multiple display modes. In laptop mode, users access a keyboard and touchpad to browse the Internet and access apps that can be arranged as a set of cards.



<http://web.archive.org/web/20091204052449/http://www.litl.com/essays/hardware.htm>

13. Rotating the webbook display into “easel mode” allows users to easily consume content from the Internet via a streamlined, intuitive interface.



<http://web.archive.org/web/20091201114605/http://www.litl.com/easy-to-use/intuitive-interface.htm>

14. In easel mode the webbook's keyboard faces away from the user, and content is enlarged on the display for easier viewing from further away.



<http://web.archive.org/web/20130420102239/http://litl.com/webbook/meet-webbook/more-fun.htm>

15. The webbook can also be configured in "frame mode," in which the keyboard faces down into the surface on which the webbook rests.

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