

EXHIBIT 2002

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**ERICSSON INC. et al.**

**Plaintiffs,**

**vs.**

**D-LINK CORPORATION, et al.**

**Defendants.**

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**Civil Action No. 6:10-CV-473**

**JURY TRIAL DEMANDED**

**FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiffs Ericsson Inc. and Telefonaktiebolaget LM Ericsson (collectively, “Plaintiffs” or “Ericsson”) file this First Amended Complaint for Patent Infringement against Defendants D-Link Systems, Inc. (“D-Link”), Netgear, Inc. (“Netgear”), Acer, Inc. and Acer America Corporation (collectively, “Acer”), Gateway, Inc. (“Gateway”), Dell, Inc. (“Dell”), Toshiba Corporation, Toshiba America, Inc., Toshiba America Information Systems, Inc., Toshiba America Consumer Products, LLC (collectively, “Toshiba”), and Belkin International, Inc. (“Belkin”) (D-Link, Netgear, Acer, Gateway, Dell, Toshiba, and Belkin collectively, “Defendants”), and allege as follows:

**PARTIES**

1. Plaintiff Ericsson Inc. is a Delaware corporation with its principal place of business at 6300 Legacy Drive, Plano, Texas 75024.
2. Plaintiff Telefonaktiebolaget LM Ericsson is a corporation organized under the laws of the country of Sweden with its principal place of business at Torshamnsgatan 23, Kista, 164 83 Stockholm, Sweden.

3. Defendant D-Link Systems, Inc. is a California corporation, with its principal place of business at 17595 Mt. Hermann Street, Fountain Valley, California 92708.

4. D-Link Systems, Inc. is making, using, selling, importing, and/or offering for sale routers and/or other devices that are compliant with one or more of 802.11(a), 802.11(e), 802.11(g), and 802.11(n) wireless LAN standards (“D-Link WLAN-compliant products”).

5. D-Link Systems, Inc. is doing business in the United States and, more particularly, in the Eastern District of Texas by making, using, selling, importing, and/or offering for sale 802.11-compliant products with PCMCIA interfaces (“PCMCIA routers”), as well as the D-Link WLAN-compliant products, including but not limited to D-Link’s Wireless G series, RangeBooster G series, Wireless N 150 series, Wireless N 300, Xtreme N series, and RangeBooster N series products that infringe the patent claims involved in this action or by transacting other business in this District. D-Link Systems, Inc., may be served with process by serving its registered agent, Nancy Lemm, at 17595 Mt. Hermann Street, Fountain Valley, California 92708.

6. Defendant Netgear, Inc. is a Delaware corporation, with its principal place of business at 350 East Plumeria Drive, San Jose, California 95134-1911.

7. Netgear, Inc. is making, using, selling, importing, and/or offering for sale routers and/or other devices that are compliant with one or more of 802.11(a), 802.11(e), 802.11(g), and 802.11(n) wireless LAN standards (hereinafter “Netgear WLAN-compliant products”).

8. Netgear, Inc. is doing business in the United States and, more particularly, in the Eastern District of Texas by making, using, selling, importing, and/or offering for sale PCMCIA routers, as well as the Netgear WLAN-compliant products, including but not limited to Netgear’s G-series and N-series products that infringe the patent claims involved in this action or by transacting other business in this District. Netgear, Inc. may be served with process by serving

its registered agent, CT Corporation System at 818 West Seventh Street, Los Angeles, California 90017.

9. Defendant Acer, Inc. is a Taiwanese corporation, with its principal place of business at 8F, 88, Sec. 1, Hsin Tai Wud Road, Hsichih 221, Taiwan.

10. Acer, Inc. is making, using, selling, importing, and/or offering for sale products that are compliant with one or more of 802.11(a), 802.11(e), 802.11(g), and 802.11(n) wireless LAN standards (hereinafter “Acer WLAN-compliant products”).

11. Acer, Inc. is doing business in the United States and, more particularly, in the Eastern District of Texas by making, using, selling importing, and/or offering for sale the Acer WLAN-compliant products, as well as personal computers including physical wireless enablement switches, including but not limited to Acer’s TravelMate series, Aspire series, Extensa series, Ferrari series, and Veriton series products that infringe the patent claims involved in this action or by transacting other business in this District.

12. Defendant Acer America Corporation is a California corporation, with its principal place of business at 333 W. San Carlos Street, Suite 1500, San Jose, California 95110.

13. Acer America Corporation is making, using, selling, importing, and/or offering for sale products that are compliant with one or more of 802.11(a), 802.11(e), 802.11(g), and 802.11(n) wireless LAN standards (“Acer WLAN-compliant products”).

14. Acer America Corporation is doing business in the United States and, more particularly, in the Eastern District of Texas by making, using, selling importing, and/or offering for sale the Acer WLAN-compliant products and personal computers including physical wireless enablement switches, including but not limited to Acer’s TravelMate series, Aspire series, Extensa series, Ferrari series, and Veriton series products that infringe the patent claims involved in this action or by transacting other business in this District. Acer America Corporation may be

served with process by serving its registered agent, CT Corporation System at 350 North St. Paul Street, Dallas, Texas 75201.

15. Defendant Gateway, Inc. is a Delaware corporation, with its principal place of business at 7565 Irvine Center Drive, Irvine, California 92618.

16. Gateway, Inc. is making, using, selling, importing, and/or offering for sale products that are compliant with one or more of 802.11(a), 802.11(e), 802.11(g), and 802.11(n) wireless LAN standards (hereinafter “Gateway WLAN-compliant products”).

17. Gateway, Inc. is doing business in the United States and, more particularly, in the Eastern District of Texas by making, using, selling importing, and/or offering for sale the Gateway WLAN-compliant products, as well as personal computers including physical wireless enablement switches, including but not limited to Gateway’s LT series, EC series, ID series, NV series, P series, SX series, DX series, FX series, and ZX series products that infringe the patent claims involved in this action or by transacting other business in this District. Gateway, Inc. may be served with process by serving its registered agent, CT Corporation System at 818 West Seventh Street, Los Angeles, California 90017.

18. Defendant Dell, Inc. is a Delaware corporation with its principal place of business at 1 Dell Way, Round Rock, Texas 78682-2222.

19. Dell, Inc. is making, using, selling, importing, and/or offering for sale products that are compliant with one or more of 802.11(a), 802.11(e), 802.11(g), and 802.11(n) wireless LAN standards (“Dell WLAN-compliant products”).

20. Dell, Inc. is doing business in the United States and, more particularly, in the Eastern District of Texas by making, using, selling importing, and/or offering for sale the Dell WLAN-compliant products and personal computers including physical wireless enablement switches, including but not limited to Dell’s Adamo, Optiplex, Latitude, Vostro, Inspiron,

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