

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

CHRIMAR SYSTEMS, INC. <i>et al.</i> , Plaintiffs,	
v. ADTRAN, INC.	6:15-cv-00618-JRG-JDL (LEAD CASE)
v. ACCTON TECH. CORP. USA <i>et al.</i>	6:15-cv-00616-JRG-JDL
v. ADVANTECH, INC.	6:15-cv-00619-JRG-JDL
v. ALLIED TELESIS, INC.	6:15-cv-00652-JRG-JDL
v. ALLWORX CORPORATION	6:15-cv-00620-JDL
v. BELDEN, INC. <i>et al.</i>	6:15-cv-00649-JRG-JDL
v. BELKIN INTERNATIONAL INC.	6:15-cv-00650-JDL
v. BLACK BOX CORP.	6:15-cv-00622-JRG-JDL
v. BUFFALO AMERICAS, INC.	6:15-cv-00625-JRG-JDL
v. COSTAR TECHNOLOGIES, INC.	6:15-cv-00626-JRG-JDL
v. DELL INC. and AEROHIVE NETWORKS, INC.	6:15-cv-00639-JRG-JDL
v. D-LINK SYSTEMS, INC.	6:15-cv-00653-JRG-JDL
v. EAGLE EYE NETWORKS, INC.	6:15-cv-00627-JRG-JDL
v. ENGENIUS TECHNOLOGIES INC.	6:15-cv-00640-JRG-JDL
v. FORTINET, INC.	6:15-cv-00651-JDL
v. HUAWEI ENTERPRISE USA INC. <i>et al.</i>	6:15-cv-00643-JDL
v. JUNIPER NETWORKS, INC.	6:15-cv-00630-JRG-JDL
v. MOXA AMERICAS INC.	6:15-cv-00633-JRG-JDL
v. NETGEAR, INC.	6:15-cv-00634-JDL
v. PHIHONG USA CORP.	6:15-cv-00636-JRG-JDL
v. TP-LINK USA CORP.	6:15-cv-00641-JDL
v. TRENDNET, INC.	6:15-cv-00644-JRG-JDL
v. WATCHGUARD TECHNOLOGIES, INC.	6:15-cv-00648-JRG-JDL

**SECOND AMENDED COMPLAINT AGAINST CONSOLIDATED DEFENDANTS**

Plaintiffs Chrimar Systems Inc. d/b/a CMS Technologies (“Chrimar”) and Chrimar Holding Company, LLC (“Holding”) file this Second Amended Complaint Against Consolidated Defendants (“the Complaint”) for infringement of United States Patent Nos. 8,155,012 (“the ’012 Patent”), 8,942,107 (“the ’107 Patent”), 8,902,760 (“the ’760 Patent”), and 9,019,838 (“the ’838 Patent”), collectively the “Patents-in-Suit.”

## THE PARTIES

1. Chrimar is a Michigan corporation with a place of business located at 36528 Grand River Avenue, Suite A-1, Farmington Hills, Michigan 48335.
2. Holding is a Texas limited liability company with a place of business located at 911 NW Loop 281, Suite 211-30, Longview, Texas 75604.
3. Chrimar and Holding are collectively referred to as “Plaintiffs” or “CMS.”
4. Accton Technology Corporation USA (“Accton”) is a California corporation with its principal place of business located at 1200 Crossman Avenue, Suite 130, Sunnyvale, California 94089. This Court has personal jurisdiction over Accton.
5. ADTRAN, Inc. (“ADTRAN”) is a Delaware corporation with its principal place of business located at 901 Explorer Boulevard, Huntsville, Alabama 35806. This Court has personal jurisdiction over ADTRAN.
6. Advantech Corporation (“Advantech”) is a California corporation with its principal place of business located at 380 Fairview Way, Milpitas, California 95035. This Court has personal jurisdiction over Advantech.
7. Aerohive Networks, Inc. (“Aerohive”) is a Delaware corporation with its principal place of business located at 330 Gibraltar Drive, Sunnyvale, California 94089. This Court has personal jurisdiction over Aerohive.
8. Allied Telesis, Inc. (“Allied Telesis”) is a Delaware corporation with its principal place of business at 3041 Orchard Parkway, San Jose, California 95134. This Court has personal jurisdiction over Allied Telesis.

9. Allworx Corporation (“Allworx”) is a Delaware corporation with its principal place of business located at 245 East Main Street, Rochester, New York 14604. This Court has personal jurisdiction over Allworx.

10. Belden Inc. (“Belden”) is a Delaware corporation with its principal place of business located at 1 N. Brentwood Blvd., 15th Floor, St. Louis, Missouri 63105. This Court has personal jurisdiction over Belden.

11. Belkin International, Inc. (“Belkin”) is a Delaware corporation with its principal place of business located at 1205 E. Waterfront Drive, Playa Vista, California 90094. This Court has personal jurisdiction over Belkin.

12. Black Box Corporation (“Black Box”) is a Delaware corporation with its principal place of business located at 1000 Park Drive, Lawrence, Pennsylvania 15055–1018. This Court has personal jurisdiction over Black Box.

13. Black Box Corporation of Pennsylvania (“Black Box of PA”) is a Delaware corporation with its principal place of business located at 1000 Park Drive, Lawrence, Pennsylvania 15055–1018. This Court has personal jurisdiction over Black Box of PA.

14. Buffalo Americas, Inc. (“Buffalo”) is a Delaware corporation with its principal place of business located at 11100 Metric Blvd., Suite 750, Austin, Texas 78758. This Court has personal jurisdiction over Buffalo.

15. Costar Technologies, Inc. (“Costar Technologies”) is a Delaware corporation with its principal place of business located at 101 Wrangler Drive, Suite 201, Coppell, Texas 75019. This Court has personal jurisdiction over Costar.

16. Costar Video Systems, LLC (“Costar Video”) is a Delaware corporation with its principal place of business located at 101 Wrangler Drive, Suite 201, Coppell, Texas 75019. This Court has personal jurisdiction over Costar.

17. Dell Inc. (“Dell”) is a Delaware corporation with its principal place of business located at One Dell Way, Round Rock, Texas 78682. This Court has personal jurisdiction over Dell.

18. D-Link Systems, Incorporated (“D-Link”) is a California corporation with its principal place of business located at 17595 Mt. Herrmann Street, Fountain Valley, California 92708. This Court has personal jurisdiction over D-Link.

19. Eagle Eye Networks, Inc. (“Eagle Eye”) is a Delaware corporation with its principal place of business located at 4611 Bee Caves Road, Suite 200, Austin, Texas 78746. This Court has personal jurisdiction over Eagle Eye.

20. Edgecore USA Corporation d/b/a/ Edgecore Networks Corporation (“Edgecore”) is a California corporation with its principal place of business located at 20 Mason, Irvine, California 92618. This Court has personal jurisdiction over Edgecore.

21. EnGenius Technologies, Inc. (“EnGenius”) is a Delaware corporation with its principal place of business located at 1580 Scenic Ave., Costa Mesa, California 92626. This Court has personal jurisdiction over EnGenius.

22. Fortinet, Inc. (“Fortinet”) is a Delaware corporation with its principal place of business located at 899 Kifer Road, Sunnyvale, California 94086. This Court has personal jurisdiction over Fortinet.

23. GarrettCom Inc. (“GarrettCom”) is a California corporation with its principal place of business located at 47823 Westinghouse Drive, Fremont, California 94539. This Court has personal jurisdiction over GarrettCom.

24. Hirschmann Automation and Control, Inc. (“Hirschmann”) is a company that is owned by Belden Inc. Hirschmann has appeared in this action.

25. Huawei Technologies USA Inc. (“Huawei Technologies”) is a Texas corporation with its principal place of business located at 5700 Tennyson Parkway, Suite 500, Plano, Texas 75024. This Court has personal jurisdiction over Technologies.

26. Huawei Enterprise USA Inc. (“Huawei Enterprise”) is a California corporation with its principal place of business located at 20400 Stevens Creek Blvd., Suite 200, Cupertino, California 95014. This Court has personal jurisdiction over Enterprise.

27. Juniper Networks, Inc. (“Juniper”) is a Delaware corporation with its principal place of business located at 1133 Innovation Way, Sunnyvale, California 94089. This Court has personal jurisdiction over Juniper.

28. Moxa Americas Inc. (“Moxa”) is a California corporation with its principal place of business located at Moxa Corporate Plaza, 601 Valencia Ave., Suite 100, Brea, California 92823. This Court has personal jurisdiction over Moxa.

29. NETGEAR, INC. (“NETGEAR”) is a Delaware corporation with its principal place of business located at 350 E. Plumeria Drive, San Jose, California 95134–1911. This Court has personal jurisdiction over NETGEAR.

30. Phihong USA Corporation (“Phihong”) is a California corporation with its principal place of business located at 47800 Fremont Blvd., Fremont, California 94538. This Court has personal jurisdiction over Phihong.

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