IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LITL LLC,
 	
        Plaintiff,
 	
v.
 	
HP INC.,
 	
        Defendant.
	Civil Action No. _____
	
	JURY TRIAL DEMANDED

COMPLAINT

Plaintiff LiTL LLC ("Plaintiff" or "LiTL") brings this action for patent infringement against Defendant HP Inc. ("Defendant" or "HP").

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. Defendant has infringed and continues 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 HP Inc. is a corporation organized under the laws of the State of Delaware, with a place of business at 1501 Page Mill Road, Palo Alto, California 94304.

JURISDICTION AND VENUE

6. 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).

7. This Court has personal jurisdiction over HP. HP is subject to general personal jurisdiction in the State of Delaware because it is incorporated in the State of Delaware.

8. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). HP is incorporated in this District. Upon information and belief, HP has transacted business in this District and has 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

9. 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.

10. 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

11. 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

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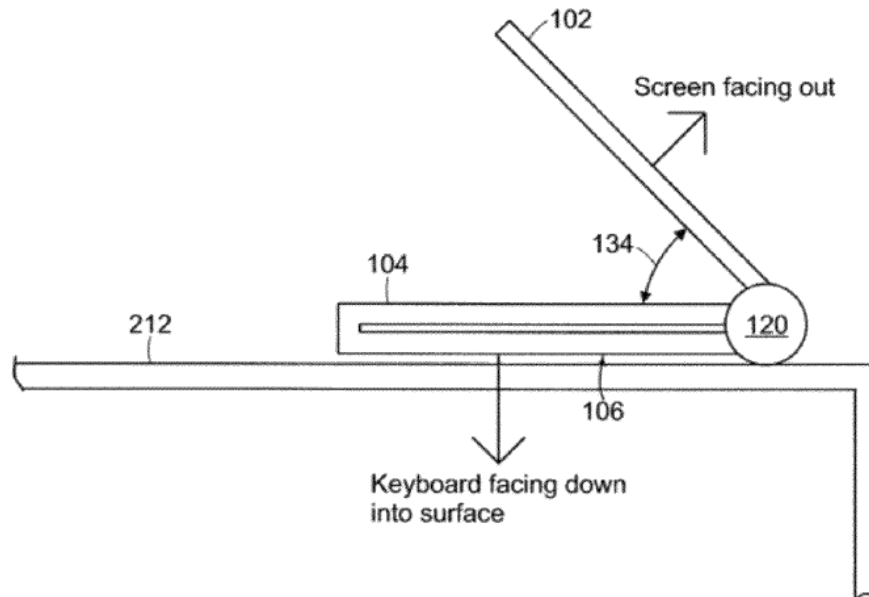

http://web.archive.org/web/20091201114605/http://www.litl.com/easy-to-use/intuitive-interface.htm

13.   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.

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

'688 patent, Figure 26.

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.

fastcase®
Smarter legal research.