IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SLYDE ANALYTICS LLC,	)	Case No. 2:23-cv-00172-RWS-RSP
Plaintiff,	)	**JURY TRIAL DEMANDED**
v.	)	
ZEPP HEALTH CORPORATION,	)	
Defendant.	)	

AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Slyde Analytics LLC ("Slyde" or "Plaintiff") for its Amended Complaint against Defendant Zepp Health Corporation ("Zepp" or "Defendant') for patent infringement alleges as follows:

THE PARTIES

1. Slyde is a limited liability company organized and existing under the laws of the State of Texas, with its principal place of business located at 104 East Houston Street, Suite 170, Marshall, TX 75670.

2. Defendant Zepp is a corporation organized and existing under the laws of China, with its principal place of business at Huami Global Innovation Center, Building B2, Zhing'an Chuanggu Technology Park, No. 900 Wangjiang West Road, Hefei, 230088, People's Republic of China. Zepp is a leading manufacturer and seller of smartwatches in the world and in the United States. Upon information and belief, Zepp does business in Texas, directly or through intermediaries, and offers its products and/or services, including those accused herein of infringement, to customers and potential customers located in Texas, including in the Judicial District of the Eastern District of Texas.

JURISDICTION

3. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq*. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has specific and personal jurisdiction over Defendant consistent with the requirements of the Due Process Clause of the United States Constitution and the Texas Long Arm Statute. Upon information and belief, Defendant has sufficient minimum contacts with the forum because Defendant transacts substantial business in the State of Texas and in this Judicial District. Further, Defendant has, directly or through subsidiaries or intermediaries, committed and continues to commit acts of patent infringement in the State of Texas and in this Judicial District as alleged in this Complaint, alleged more particularly below.

5. Venue is proper in this Judicial District as to Defendant pursuant to 28 U.S.C. § 1391 because, among other things, Defendant is not a resident in the United States, and thus may be sued in any judicial district pursuant to 28 U.S.C. § 1391(c)(3). Defendant, through its own acts and/or through the acts of its subsidiaries or agents, makes, uses, sells, and/or offers to sell infringing products within this Judicial District, regularly does and solicits business in this Judicial District, and has the requisite minimum contacts with the Judicial District such that this venue is a fair and reasonable one.

PATENTS-IN-SUIT

6. On November 19, 2013, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,588,033 (the "'033 Patent") entitled "Wristwatch with Electronic Display". A true and correct copy of the '033 Patent is available at: https://patentimages.storage.googleapis.com/07/3c/fe/2030932c07dec3/US8588033.pdf.

7. On May 16, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,651,922 (the "'922 Patent") entitled "Wristwatch with a Touch Screen and Method for Displaying on a Touch-Screen Watch". A true and correct copy of the '922 Patent is available at: https://patentimages.storage.googleapis.com/46/41/aa/e6cf42c43ea6fd/US9651922.pdf.

8. On October 31, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,804,678 (the "'678 Patent") entitled "Method and Circuit for Switching a Wristwatch from a First Power Mode to a Second Power Mode". A true and correct copy of the '678 Patent is available at: https://patentimages.storage.googleapis.com/66/75/da/3c1794bd793023/US9804678.pdf.

9. On February 5, 2019, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,198,085 (the "'085 Patent") entitled "Method and Circuit for Switching a Wristwatch from a First Power Mode to a Second Power Mode". A true and correct copy of the '085 Patent is available at: https://patentimages.storage.googleapis.com/2f/74/71/1b183d01f4d6c0/US10198085.pdf.

10. On April 26, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,320,457 (the "'457 Patent") entitled "Integrated Portable Deice and Method Implementing an Accelerometer for Analyzing Biomechanical Parameters of a Stride". A true and correct copy of the '457 Patent is available at: https://patentimages.storage.googleapis.com/00/6c/f0/d788ae39a5f931/US9320457.pdf.

11. On January 23, 2018, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,873,018 (the "'018 Patent") entitled "Integrated Portable Deice and Method Implementing an Accelerometer for Analyzing Biomechanical Parameters of a

Stride". A true and correct copy of the '018 Patent is available at: https://patentimages.storage.googleapis.com/8e/51/b7/79c6a81c80a7e0/US9873018.pdf.

12. On January 3, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,536,134 (the "'134 Patent") entitled "Athlete Performance Monitoring Device". A true and correct copy of the '134 Patent is available at: https://patentimages.storage.googleapis.com/ae/cb/1e/a8c70047a23863/US9536134.pdf.

13. Slyde is the sole and exclusive owner of all right, title, and interest in the '033 Patent, the '922 Patent, the '678 Patent, the '085 Patent, the '457 Patent, the '018 Patent, and the '134 Patent (collectively, the "Patents-in-Suit"), and holds the exclusive right to take all actions necessary to enforce its rights to the Patents-in-Suit, including the filing of this patent infringement lawsuit. Slyde also has the right to recover all damages for past, present, and future infringement of the Patents-in-Suit and to seek injunctive relief as appropriate under the law.

14. Slyde has at all times complied with the marking provisions of 35 U.S.C. § 287 with respect to the Patents-in-Suit. Upon information and belief, prior assignees and licensees have also complied with the marking provisions of 35 U.S.C. § 287.

FACTUAL ALLEGATIONS

15. The Patents-in-Suit generally relate to methods and apparatuses related to wristwatches with a digital display.

16. The '033 Patent generally relates to technology involving a wristwatch with an electronic display that displays a simulation of the movement of a mechanical watch. The technology described in the '033 Patent was developed by famed watch designers Pascal Pozzo Di Borgo and Jorg Hysek. For example, the technology is implemented by infringing smartwatches with an electronic display allowing for the display of a simulated mechanical watch

movement including, but not limited to, the Amazfit Cheetah Pro, Amazfit Cheetah, Amazfit Active, Amazfit Active Edge, Amazfit Bip 5, Amazfit Balance, Amazfit T-Rex 2, Amazfit GTR Mini, Ma Amazfit Falcon, Amazfit T-Rex Ultra, Amazfit GTR Pro Limited Edition, Amazfit Bip 3, Amazfit Band 7, Amazfit Bip 3 Pro, Amazfit GTS 4 Mini, Amazfit GTR 4, Amazfit GTS 4, Amazfit T-Rex 2, Amazfit GTR 3 Pro, Amazfit GTR 3, Amazfit GTS 3, Amazfit Verge Lite, Amazfit Bip S Lite, Zepp E Square, Zepp E Circle, Zepp Z, Amazfit T-Rex Pro, Amazfit GR 2e, Amazfit GTS 2e, Amazfit Bip U Pro, Amazfit GTS 2 mini, Amazfit Bip U, Amazfit GTS 2, Amazfit GTR 2, Amazfit Band 5, Amazfit GTR 42mm, Amazfit GTR 47mm, Amazfit GTS, Amazfit T-Rex, and Amazfit Bip S, alone or in combination with certain fitness applications, among other products.

17. The ’922 Patent generally relates to technology involving a wristwatch with a digital matrix display, a sheet of touch-sensitive glass, and a processing circuit for interpreting signals from the touch-sensitive glass in order to make changes to what is displayed on the digital matrix display. The technology described in the ’922 Patent was developed by famed watch designers Pascal Pozzo Di Borgo and Jorg Hysek. For example, the technology is implemented by infringing smartwatches with a digital display including, but not limited to, the Amazfit Cheetah Pro, Amazfit Cheetah, Amazfit Active, Amazfit Active Edge, Amazfit Bip 5, Amazfit Balance, Amazfit T-Rex 2, Amazfit GTR Mini, Amazfit Falcon, Amazfit T-Rex Ultra, Amazfit GTR Pro Limited Edition, Amazfit Bip 3, Amazfit Band 7, Amazfit Bip 3 Pro, Amazfit GTS 4 Mini, Amazfit GTR 4, Amazfit GTS 4, Amazfit T-Rex 2, Amazfit GTR 3 Pro, Amazfit GTR 3, Amazfit GTS 3, Amazfit Verge Lite, Amazfit Bip S Lite, Zepp E Square, Zepp E Circle, Zepp Z, Amazfit T-Rex Pro, Amazfit GR 2e, Amazfit GTS 2e, Amazfit Bip U Pro, Amazfit GTS 2 mini, Amazfit Bip U, Amazfit GTS 2, Amazfit GTR 2, Amazfit Band 5, Amazfit GTR 42mm, Amazfit GTR 47mm,

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