

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

ASETEK DANMARK A/S,

Civil Action No. 6:21-cv-00501

Plaintiff,

v.

**JURY TRIAL DEMAND**

SHENZHEN APALTEK CO., LTD., A/K/A  
SHENZHEN ANG PAI TECHNOLOGY CO.,  
LTD. AND GUANGDONG APALTEK LIQUID  
COOLING TECHNOLOGY CO., LTD., A/K/A  
GUANGDONG ANG PAI LIQUID COOLING  
TECHNOLOGY CO., LTD., OR DONGGUAN  
APALCOOL

Defendants.

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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Asetek Danmark A/S (“Asetek”), files this Complaint for Patent Infringement and Damages against Defendants Shenzhen Apaltek Co., Ltd., a/k/a Shenzhen Ang Pai Technology Co., Ltd. (“Apaltek”) and Guangdong Apaltek Liquid Cooling Technology Co., Ltd., a/k/a Guangdong Ang Pai Liquid Cooling Technology Co., Ltd., or Dongguan Apalcool (“Apalcool”) (collectively, “Defendants”), and would respectfully show the Court as follows:

**NATURE OF THE ACTION**

1. This Complaint seeks judgment that the Defendants have infringed and continue to infringe Asetek’s U.S. Patent Nos. 8,240,362 (“the ’362 patent), 8,245,764 (“the ’764 patent), 10,078,355 (“the ’355 patent”), and 10,599,196 (“the ’196 patent”) (collectively “the Patents-in-Suit”). Each of these patents relates to liquid cooling systems and methods for cooling heat generating electronic components.

## **PARTIES**

2. Asetek is a corporation organized and existing under the laws of Denmark, and has a location at Assensvej 2, DK-9220 Aalborg East, Denmark. Asetek is the owner of the Patents-in-Suit.

3. On information and belief, Apaltek is a Chinese corporation with its principal place of business at B03/B04/B05, 15th Floor, Block 2, Yicheng Huanzhi Center, Intersection of Renmin Road and Bayi Road, Jinglong Community, Longhua Street, Longhua District, Shenzhen, Guangdong Province, PRC.

4. On information and belief, Apalcool is a Chinese corporation with its principal place of business at No. 12, West Second Lane, Shenzhen Zai Road, Qingxi Town, Dongguan City, Guangdong Province, PRC.

## **JURISDICTION AND VENUE**

5. This is an action for patent infringement arising under the United States Patent Laws, 35 U.S.C. § 100 et seq. Subject matter jurisdiction is proper under 28 U.S.C. §§ 1331 and 1338(a).

6. Upon information and belief, Defendants operate a website, [www.apalcool.com](http://www.apalcool.com), on which they describe themselves under their “About Us” tab as having “more than 20 years of experience in the design and production of liquid-cooled and air-cooled heat dissipation products.” Defendants describe themselves under their “About Us” tab as providers of ODM and OEM manufacturing services for the global heat dissipation industry. (“[W]e provide ODM/OEM customers with superior products and excellent services. We hope to become a loyal partner in the local and global heat dissipation industry, so that people anywhere in the world can share happiness through our products and our customers.”)

7. The following products infringe at least one claim of each of the Patents-in-Suit as explained in detail in Counts I-IV below: the Lian Li Galahad AIO 240 RGB, the Enermax AquaFusion 240, and Thermaltake TH120 ARGB Sync (collectively the “Exemplary Infringing Products”). On information and belief, the Lian Li Galahad AIO family of liquid cooling products, the Enermax AquaFusion family of liquid cooling products, and the Thermaltake TH ARGB Sync family of liquid cooling products infringe at least one claim of each of the Patents-in-Suit.

8. Upon information and belief, Defendants make, offer for sale, and sell the Galahad AIO line of liquid cooling products to Lian Li, the AquaFusion line of liquid cooling products to Enermax, and the TH120 ARGB Sync line of liquid cooling products Thermaltake, knowing and intending that these customers and/or resellers (including [www.amazon.com](http://www.amazon.com), [www.newegg.com](http://www.newegg.com), and [www.walmart.com](http://www.walmart.com)) will and do offer for sale and sell Exemplary Infringing Products to customers throughout the United States. For example, the Galahad AIO line of liquid cooling products, the AquaFusion line of liquid cooling products, and the TH120 ARGB Sync line of liquid cooling products have been and are offered for sale and sold throughout the United States, Texas, and this district on [www.amazon.com](http://www.amazon.com), [www.newegg.com](http://www.newegg.com), and [www.walmart.com](http://www.walmart.com). On information and belief, these products are purchased and used by customers in this district. This Court has personal jurisdiction over Defendants for at least the reasons set forth in this paragraph and the preceding paragraph.

9. On information and belief, Defendants also likely offer for sale, sell, import, and/or ship the infringing Enermax AquaFusion line of products to Enermax USA in the United States, and the infringing Thermaltake TH ARGB Sync line of liquid cooling products to Thermaltake in the United States.

10. Venue is proper in the District in accordance with 28 U.S.C. § 1391(c)(3) because Defendants are foreign corporations not resident in the United States.

### **FACTUAL BACKGROUND**

11. Asetek is a world leading provider of liquid cooling systems for heat-generating electronic components, such as CPUs and GPUs. Asetek's business is dedicated entirely to liquid cooling, which makes up 100% of its revenue. Asetek's solutions are used by leading original equipment manufacturers ("OEM") servicing the datacenter, server, gaming, workstation, and high performance PC markets. Asetek is also the leading provider of liquid cooling products for the enthusiast/do-it-yourself market, which includes end-users who buy and self-install liquid cooling systems into their computers.

12. Asetek's patented combination of a pump, a dual chambered reservoir, and a cold plate into a single pump unit—which is claimed in the Patents-in-Suit—provides the benefits of improved pumping and heat removal efficiencies in a compact (narrow profile) design that enables the pump unit to be installed directly on the CPU/GPU of a computer motherboard, graphics card, or a server. In addition to improved efficiency and compactness, Asetek's patented designs have greatly reduced and/or eliminated the risk of coolant leakage and have enabled pre-filled (factory assembled and sealed) liquid cooling products that are easy to install and use. Asetek's patented designs have also made manufacturing of liquid cooling products simpler and less costly.

13. The Exemplary Infringing Products have the same fundamental pump unit structure and configuration; any differences between the products are irrelevant to the claims of the Patents-in-Suit and to Defendants' infringement of the same. Upon information and belief, the same is true for the Galahad AIO line of liquid cooling products, the AquaFusion line of liquid cooling products, and the TH120 ARGB Sync line of liquid cooling products. Accordingly,

Counts I-IV below refer to the Lian Li Galahad AIO 240 as a representative product for all of the Exemplary Infringing Products and their respective product lines.

**COUNT I**  
**INFRINGEMENT OF U.S. PATENT NO. 8,240,362**

14. Asetek incorporates by reference paragraphs 1-10 as though fully set forth herein.

15. Asetek owns the entire right, title, and interest in and to the '362 patent. A true and correct copy of the '362 patent is attached hereto as Exhibit A.

16. The Exemplary Infringing Products infringe at least claim 14 of the '362 patent, either literally and/or under the doctrine of equivalents.

17. The Exemplary Infringing Products are cooling systems for processing units positioned on a motherboard of a computer and comprise the claimed elements of at least claim 14 of the '362 patent.



18. The Exemplary Infringing Products include “a reservoir configured to be coupled to the processing unit positioned on the motherboard at a first location, the reservoir being adapted to pass a cooling liquid therethrough.” For example, as the image of the representative Lian Li

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