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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 ACROX TECHNOLOGIES CO., LTD.,

12 Plaintiff,

13 v.

14 BEST BUY CO., INC.,
15 BEST BUY STORES, L.P.,
BESTBUY.COM, LLC,
16 LOGITECH INTERNATIONAL S.A., and
LOGITECH INC.,

17 Defendants.
18

CASE NO.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

1 Plaintiff Acrox Technologies Co., Ltd. (“Acrox”), by and through its counsel of record, and
2 for its Complaint against Best Buy Co., Inc., Best Buy Stores, L.P., BestBuy.com, LLC (“Best Buy”),
3 and Logitech International S.A., and Logitech Inc. (“Logitech”) (collectively “Defendants”), states
4 as follows:

5 NATURE OF THE ACTION

6 1. This Complaint seeks judgment that Best Buy and Logitech have infringed and
7 continue to infringe Acrox’s U.S. Patent No. 8,746,447 (“the ’447 patent”), which relates to a
8 protector for a portable electronic device. A true and accurate copy of the ’447 patent is attached
9 hereto as Exhibit A.

10 THE PARTIES

11 2. Plaintiff Acrox Technologies Co., Ltd. is a corporation organized and existing under
12 the laws of Taiwan, and has its principal place of business at 4F, No. 89, Minshan St., Neihu Dist.,
13 Taipei 114, Taiwan, R.O.C. Acrox is the owner of the ’447 patent.

14 3. Upon information and belief, defendant Best Buy Co., Inc. is a corporation operating
15 and existing under the laws of the state of Minnesota with its principal place of business at 7601
16 Penn Avenue, Richfield, Minnesota 55423. Upon information and belief, Best Buy Co., Inc. is the
17 ultimate corporate parent of a number of entities operating generally under the Best Buy name.

18 4. Upon information and belief, defendant Best Buy Stores, L.P. is a limited partnership
19 operating and existing under the laws of the state of Minnesota with its principal place of business at
20 7601 Penn Avenue, Richfield, Minnesota 55423. Upon information and belief, Best Buy Stores, L.P.
21 is a subsidiary of Best Buy Co., Inc.

22 5. Upon information and belief, defendant BestBuy.com, LLC is a limited liability
23 company operating and existing under the laws of the state of Minnesota with its principal place of
24 business at 7601 Penn Avenue, Richfield, Minnesota 55423. Upon information and belief,
25 BestBuy.com, LLC is a subsidiary of Best Buy Co., Inc.

26 6. Upon information and belief, defendant Logitech International S.A. is a corporation
27 operating and existing under the laws of Switzerland with its principal place of business at Rue du
28 Sablon 2-4, 1110 Morges, Switzerland.

1 providing or causing to be used in the United States, including in this District, products that infringe
2 the '447 patent, including but not limited to the Ultrathin Portfolio Keyboard Case, Ultrathin
3 Keyboard Folio Case, Folio Case, Hinge Case, Turnaround Case, Carrying Case (Folio), PRO
4 Keyboard Case, Type S Bluetooth Keyboard Case, Keyboard Folio Case, other products of the same
5 or similar configurations, products under different names, and variants of these products.

6 25. The Best Buy defendants' infringement of the '447 patent has caused and continues
7 to cause damage and irreparable harm to Plaintiff.

8 26. Upon information and belief, the Logitech defendants, without authority or consent of
9 Acrox, have directly infringed and continue to directly infringe, under 35 U.S.C. § 271(a), at least
10 claims 1, 2, and 3 of the '447 patent by making, using, offering to sell, selling, importing, and/or
11 providing or causing to be used in the United States, including in this District, products that infringe
12 the '447 patent, including but not limited to the Ultrathin Portfolio Keyboard Case, Ultrathin
13 Keyboard Folio Case, Folio Case, Hinge Case, Turnaround Case, Carrying Case (Folio), PRO
14 Keyboard Case, Type S Bluetooth Keyboard Case, Keyboard Folio Case, other products of the same
15 or similar configurations, products under different names, and variants of these products.

16 27. The Logitech defendants' infringement of the '447 patent has caused and continues to
17 cause damage and irreparable harm to Plaintiff.

18 **PRAYER**

19 WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in its favor and
20 against Defendants as follows:

- 21 A. An adjudication that the Defendants have infringed the '447 patent;
- 22 B. A permanent injunction enjoining Defendants and their officers, directors, employees,
23 agents, licensees, representatives, affiliates, related companies, servants, successors and assigns, and
24 any and all persons acting in privity or in concert with any of them, from further infringing the '447
25 patent;
- 26 C. An award of damages to be paid by Defendants adequate to compensate Plaintiff for
27 Defendants' past infringement, and any continuing and future infringement, direct and/or indirect,
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