

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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<b>THINK PRODUCTS, INC.</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	
-v.-	:	<b><u>JURY TRIAL DEMANDED</u></b>
	:	
<b>ACCO BRANDS CORPORATION</b>	:	
<b>and ACCO BRANDS USA LLC,</b>	:	
	:	
<b>Defendants.</b>	:	

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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, Think Products, Inc., by and through its attorneys, hereby alleges for its Complaint against Defendants ACCO Brands Corporation and ACCO Brands USA LLC, as follows:

**The Parties**

1. Plaintiff Think Products, Inc. is a corporation organized and existing under the laws of the State of New York and having its principal place of business at 120 Ricefield Lane, Hauppauge, New York 11788.

2. Upon information and belief, Defendant ACCO Brands Corporation is a corporation organized and existing under the laws of the State of Delaware and having its principal place of business at 4 Corporate Drive, Lake Zurich, Illinois 60047.

3. Upon information and belief, Defendant ACCO Brands USA LLC is a limited liability company organized and existing under the laws of the State of Delaware and

having its principal place of business at 4 Corporate Drive, Lake Zurich, Illinois 60047, the sole member of Defendant ACCO Brands USA LLC is Defendant ACCO Brands Corporation.

**COUNT I**

**INFRINGEMENT OF UNITED STATES PATENT NO. 11,313,155  
BY DEFENDANTS' STUDIODOCK iPad DOCKING STATION**

4. This is a count for the infringement of U.S. Patent No. 11,313,155, issued April 26, 2022 (“Exhibit 1”), which count arises under the Patent Laws of the United States, Title 35, United States Code, and, more specifically, under 35 U.S.C. §271(a).

5. This Court has jurisdiction over the subject matter of this count pursuant to 28 U.S.C. §§1331 and 1338(a).

6. Venue is proper in this judicial district pursuant to 28 U.S.C. §1400(b) because each of Defendants ACCO Brands Corporation and ACCO Brands USA LLC has committed acts patent infringement in this district and each of Defendants ACCO Brands Corporation and ACCO Brands USA LLC has a regular and established place of business in this district.

7. Plaintiff Think Products, Inc. is the owner of the entire right, title and interest in, and to, U.S. Patent No. 11,313,155, and the invention disclosed and claimed therein, entitled “LOCKING ASSEMBLY FOR ELECTRONIC TABLET AND OTHER DEVICES,” by virtue of an Assignment recorded in the United States Patent and Trade-mark Office on April 22, 2021. (“Exhibit 2”)

8. Upon information and belief, Defendants ACCO Brands Corporation and ACCO Brands USA LLC (collectively “ACCO Brands”) manufacture and/or have sold,

and continue to offer for sale and to sell, in this judicial district one or more portable electronic device docking products generally known as, and exemplified by, the “StudioDock iPad Docking Station,” as shown below and downloaded June 15, 2022:

Kensington

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Home / Products / Device Docking & Connectivity Products / iPad Docking Stations / StudioDock™ iPad Docking Station

StudioDock™ iPad Docking Station

**\$399.99**

Device Compatibility  
iPad Pro 12.9" (2018/2020) iPad Pro ▾  
View All ▾

SKU: K34030WW

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**Request Business Pricing**

Kensington Store

HOME PRODUCTS ▾ **SPECIALS** NEW RELEASES

Home / StudioDock

StudioDock

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Showing 4 results

StudioDock™ iPad Docking Station iPad Pro 12.9" (2021)  
\$399.99

**ADD TO BAG**

StudioDock™ iPad Docking Station iPad Pro 12.9" (2018/2020)  
~~\$379.99~~ \$319.99

**ADD TO BAG**

StudioDock™ iPad Docking Station iPad Pro 11" (2018/2020/2021) or iPad Air (2020)  
\$379.99

**ADD TO BAG**

9. The “StudioDock iPad Docking Station” (and potentially related products) of ACCO Brands’ Kensington division directly infringes at least one claim of U.S. Patent No. 11,313,155, such infringement, upon information and belief, having been, and continuing to be, knowing and in willful disregard of the rights of Plaintiff Think Products, Inc., inasmuch as ACCO Brands, through counsel, was provided with actual notice of the rights of Plaintiff Think Products, Inc. prior to the issuance of U.S. Patent No. 11,313,155, and that ACCO Brands’ manufacture and/or sale of the “StudioDock iPad Docking Station” by ACCO Brands’ Kensington division would be an infringement of one or more of the claims of U.S. Patent No. 11,313,155, upon issuance of said patent.

10. Plaintiff Think Products, Inc. has suffered, and will continue to suffer, damages as a result of ACCO Brands’ Kensington division’s infringement of U.S. Patent No. 11,313,155 resulting from the manufacture and/or sale in the United States of ACCO Brands’ “Studio iPad Docking Station” products.

11. Plaintiff Think Products, Inc. is entitled to recover damages adequate to compensate it for ACCO Brands’ infringement of U.S. Patent No. 11,313,155 resulting from the manufacture and/or sale in the United States of ACCO Brands’ “Studio iPad Docking Station” products in an amount no less than a reasonable royalty under 35 U.S.C. §284.

**COUNT II**

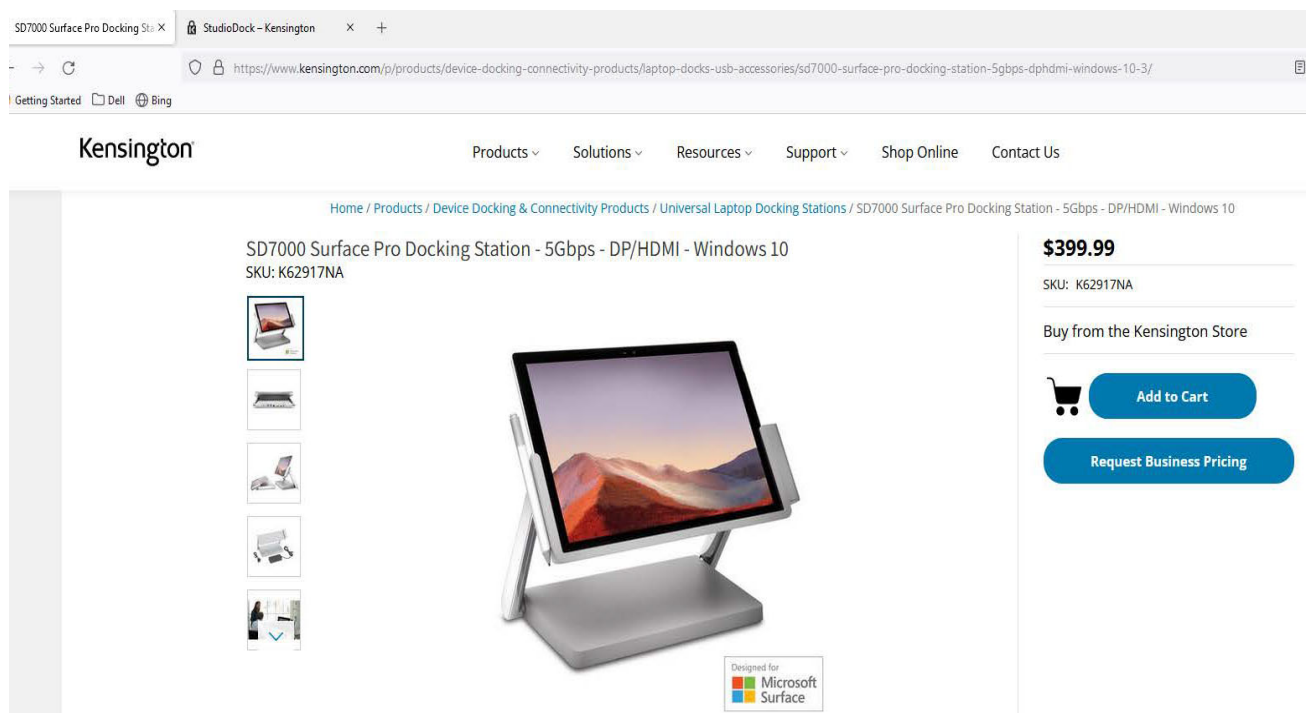
**INFRINGEMENT OF UNITED STATES PATENT NO. 11,313,155  
BY DEFENDANTS’ SD7000 SURFACE PRO DOCKING STATION**

12. This is a count for the infringement of U.S. Patent No. 11,313,155, issued April 26, 2022 (“Exhibit 1”), which count arises under the Patent Laws of the United

States, Title 35, United States Code, and, more specifically, under 35 U.S.C. §271(a).

13. Plaintiff Think Products, Inc. incorporates by reference the jurisdictional, venue and patent ownership allegations of ¶¶ 5, 6 and 7, *supra*, as if fully set forth herein.

14. Upon information and belief, Defendants ACCO Brands Corporation and ACCO Brands USA LLC (collectively “ACCO Brands”) manufacture and/or have sold, and continue to offer for sale and to sell, in this judicial district one or more portable electronic device docking products generally known as, and exemplified by, the “SD7000 Surface Pro Docking Station,” as shown below and downloaded June 15, 2022:



15. The “SD7000 Surface Pro Docking Station” (and potentially related products) of ACCO Brands’ Kensington division directly infringes at least one claim of U.S. Patent No. 11,313,155, such infringement, upon information and belief, having been, and continuing to be, knowing and in willful disregard of the rights of Plaintiff Think Products, Inc., inasmuch as ACCO Brands, through counsel, was provided with actual

notice of the rights of Plaintiff Think Products, Inc. prior to the issuance of U.S. Patent No. 11,313,155, and that ACCO Brands' manufacture and/or sale of the "SD7000 Surface Pro Docking Station" by ACCO Brands' Kensington division would be an infringement of one or more of the claims of U.S. Patent No. 11,313,155, upon issuance of said patent.

16. Plaintiff Think Products, Inc. has suffered, and will continue to suffer, damages as a result of ACCO Brands' Kensington division's infringement of U.S. Patent No. 11,313,155 resulting from the manufacture and/or sale in the United States of ACCO Brands' "SD7000 Surface Pro Docking Station" products.

17. Plaintiff Think Products, Inc. is entitled to recover damages adequate to compensate it for ACCO Brands' infringement of U.S. Patent No. 11,313,155 resulting from the manufacture and/or sale in the United States of ACCO Brands' "SD7000 Surface Pro Docking Station" products in an amount no less than a reasonable royalty under 35 U.S.C. §284.

WHEREFORE, Plaintiff Think Products, Inc. respectfully requests Judgment against Defendants ACCO Brands Corporation and ACCO Brands USA LLC granting Think Products, Inc.:

I. An award of damages adequate to compensate Plaintiff Think Products, Inc. for the infringement of U.S. Patent No. 11,313,155 resulting from the manufacture and/or sell of ACCO Brands' "StudioDock iPad Docking Station" and "SD7000 Surface Pro Docking Station," together with prejudgment interest from the date of the knowing and willful commencement of the infringing activities on the date of issuance of U.S. Patent No. 11,313,155, but in no event less than a reasonable royalty, as specified by 35 U.S.C.

§284;

II. An award of “increased damages,” as permitted by 35 U.S.C. §284, the infringement of U.S. Patent No. 11,313,155 by Defendants ACCO Brands Corporation and ACCO Brands USA LLC having been knowing and willful;

III. An award of reasonable attorneys’ fees to Plaintiff Think Products, Inc., pursuant to 35 U.S.C. §285, this case being “exceptional” within the meaning of that statutory provision;

IV. Preliminary and permanent injunctive relief enjoining Defendants ACCO Brands Corporation and ACCO Brands USA LLC, its agents and all those acting in active concert with them, from the further infringement of U.S. Patent No. 11,313,155, as consistent with the principles and laws of equity; and,

V. Such other and further relief as Plaintiff Think Products, Inc. may be entitled to.

Respectfully submitted,

THINK PRODUCTS, INC.

Dated: June 16, 2022

By /s/ *Edwin D. Schindler*

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