

1 Dmitry Kheyfits (SBN 321326)  
2 dkheyfits@kblit.com  
3 KHEYFITS BELENKY LLP  
4 4 Embarcadero Center, Suite 1400  
5 San Francisco, CA 94111  
6 Tel: 415-429-1739  
7 Fax: 415-429-6347

8 *Attorneys for USB Bridge Solutions, LLC*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 USB BRIDGE SOLUTIONS, LLC,

13 Plaintiff,

14 v.

15 SILICON POWER COMPUTER &  
16 COMMUNICATIONS INC., and  
17 SILICON POWER COMPUTER &  
18 COMMUNICATIONS USA INC.

19 Defendants.

20 Case No.: 22-cv-3781

21 **COMPLAINT FOR PATENT**  
22 **INFRINGEMENT**

23 **DEMAND FOR JURY TRIAL**  
24  
25  
26  
27  
28



1 Silicon Power Taiwan purposefully supplies and directs the accused products for  
2 storage, warehousing, and sales by distributors and resellers in the State of  
3 California; and (iii) Silicon Power Taiwan delivers its products into the stream of  
4 commerce with the expectation that they will be purchased by consumers in the  
5 State of California. In addition, or in the alternative, this Court has personal  
6 jurisdiction over ADATA pursuant to Fed. R. Civ. P. 4(k)(2).

7 8. Silicon Power USA is subject to personal jurisdiction of this Court  
8 because, *inter alia*, on information and belief, independently and/or via its agents,  
9 (i) Silicon Power USA is a California corporation, (ii) Silicon Power USA has its  
10 principal place of business in this Judicial District at 4590 Enterprise Street,  
11 Fremont, CA 94538; (ii) Silicon Power USA regularly conducts business in the  
12 State of California; and (iii) Silicon Power has committed and continues to commit  
13 acts of patent infringement in the State of California, including by making, using,  
14 offering to sell, selling, and/or importing the accused products into California.

15 9. Venue is proper as to Silicon Power Taiwan in this Judicial District  
16 under 28 U.S.C. § 1391(c) because, *inter alia*, Silicon Power Taiwan is a foreign  
17 corporation.

18 10. Venue is proper as to Silicon Power USA in this Judicial District  
19 under 28 U.S.C. § 1400(b) because, *inter alia*, on information and belief, Silicon  
20 Power USA maintains a regular and established place of business in this Judicial  
21 District at 4590 Enterprise Street, Fremont, CA 94538, and has committed acts of  
22 patent infringement in this Judicial District and/or has contributed to or induced  
23 acts of patent infringement by others in this District.

24 **BACKGROUND**

25 11. On June 12, 2007, the United States Patent and Trademark Office  
26 duly and lawfully issued U.S. Patent No. 7,231,485 (“the Patent-in-Suit” or the  
27 “’485 Patent”), entitled “Universal Serial Bus (USB) Interface For Mass Storage  
28

1 Device.”

2 **NOTICE**

3 12. By letter dated June 2, 2020, USBB, via its licensing agent, notified  
4 Silicon Power of the existence of the '485 Patent and attached the Memorandum  
5 Opinion and Order Regarding Claim Construction issued in *USB Bridge Solutions,*  
6 *LLC v. Buffalo Inc. et al.* (C.A. No. 1-17-cv-1158-LY) (W.D. Tex.).

7 13. By letter dated June 21, 2021, USBB followed up on the June 2, 2020  
8 letter, identifying Silicon Power's products and further identifying a claim of the  
9 '485 Patent that these products infringed.

10 **COUNT I: INFRINGEMENT OF THE '485 PATENT**

11 14. Plaintiff incorporates the preceding paragraphs as if fully set forth  
12 herein.

13 15. On information and belief, Silicon Power has infringed, and continues  
14 to infringe, the '485 Patent pursuant to 35 U.S.C. § 271(a), literally or under the  
15 doctrine of equivalents, by making, using, offering to sell, selling in the United  
16 States or importing into the United States the portable hard drives such as the  
17 Armor A30, Armor A60, Bolt B75 Pro, and all other external and/or portable  
18 drives and drive enclosures comprising a USB interface and SATA functionality  
19 recited in the asserted claims (“Accused Products”).

20 16. For example, on information and belief, Silicon Power has infringed  
21 at least claim 8 of the '485 Patent by making, using, offering to sell, selling in the  
22 United States or importing into the United States the Accused Products comprising  
23 a secondary board configured to enable communication between a mass storage  
24 device motherboard and a host motherboard, such as the Silicon Power Armor A30  
25 Portable HD. *See* Ex. 1, Silicon Power Armor A60 Portable HD Datasheet; Ex. 2,  
26 Photograph showing the secondary board in the Silicon Power Armor A60 Portable  
27 HD being connected to a motherboard of a mass storage device. *See also* Ex. 7  
28

1 showing a secondary board being connected to the motherboard of the mass  
2 storage device in the B75 Pro model. *See also* Ex. 8 (showing same for the A30  
3 model, excerpted from a teardown video available at  
4 <https://www.youtube.com/watch?v=r1h63oyeqNY>). The Accused Products  
5 include a bridging System-on-Chip, such as the ASMedia ASM1153. *See* Ex. 3,  
6 Photograph of a secondary board having a bridging System-on-Chip in the Silicon  
7 Power Armor A30 Portable HD; Ex. 4, ASM1153 Webpage Description, p. 1  
8 (“ASM1153 is the ASMedia third generation single chip solution, bridging the  
9 USB3.2 Gen1 to Serial SATA host interface with highly integrated SuperSpeed  
10 USB3.0, High Speed USDB2.0 and SATA1.5/3.0 Gbps ASMedia self -designed  
11 PHYs.”).

12 17. The Accused Products comprise a connector port for receiving signals  
13 from the mass storage device motherboard. *See* Ex. 2, Photograph showing the  
14 secondary board in the Silicon Power Armor A60 Portable HD having a connector  
15 port.

16 18. The Accused Products comprise a bridging circuit for converting the  
17 signals from the mass storage device motherboard into USB signals. *See* Ex. 2,  
18 Photograph showing the secondary board in the Silicon Power Armor A60 Portable  
19 HD having a bridging System-on-Chip; Ex. 3, Photograph of the ASMedia  
20 ASM1153 bridging System-on-Chip in the Silicon Power Armor A60 Portable  
21 HD; Ex. 4, ASM1153 Webpage Description, p. 1 (“ASM1153 is the ASMedia  
22 third generation single chip solution, bridging the USB3.2 Gen1 to Serial SATA  
23 host interface with highly integrated SuperSpeed USB3.0, High Speed USDB2.0  
24 and SATA1.5/3.0 Gbps ASMedia self -designed PHYs.”).

25 19. The bridging circuit includes a USB physical interface transceiver.  
26 *See* Ex. 4 ASM1153 Webpage Description, p. 1 (“Compliant with USB3.0  
27 Specification Revision 1.0 . . . Compliant with USB Specification Revision 2.0”);  
28

1 Ex. 5 Universal Serial Bus 3.0, Specification, Revision 1.0, p. 5-33 (Showing Tx  
2 and Rx lines of a USB 3.0 connector).

3 20. The bridging circuit includes a serial interface engine coupled to the  
4 USB physical interface transceiver. *See* Ex. 4, ASM1153 Webpage Description, p.  
5 1 (“Compliant with USB3.0 Specification Revision 1.0 . . . Compliant with USB  
6 Specification Revision 2.0”). The serial interface engine is coupled to the USB  
7 physical interface transceiver, such as by a bus.

8 21. On information and belief, the bridging circuit includes an  
9 input/output interface coupled to the serial interface engine. *See* Ex. 6, ASM1053  
10 Datasheet (showing, for example, input/output interface being coupled to the serial  
11 interface engine). On information and belief, the relevant features and components  
12 of the ASM1053 SoC are also present in the ASM1153 SoC. The exemplary  
13 interfaces are coupled to the serial interface engine, such as by a bus.

14 22. On information and belief, the bridging circuit includes a RAM  
15 control circuit coupled to the input/output interface, such as RAM and buffer  
16 control circuits internal to the ASM1153. *See* Ex. 4, ASM1153 Webpage  
17 Description, p. 1 (“Integrated 8-bit micro-processor with embedded program RAM  
18 and ROM”); Ex. 6, ASM1053 Datasheet (showing RAM and the input/output  
19 interface discussed above). The exemplary RAM control circuits, included in the  
20 RAM blocks, are coupled to the input/output interface, such as by a bus.

21 23. On information and belief, the bridging circuit includes a global  
22 control circuit coupled to the input/output interface. For example, the Accused  
23 Products include USB Device Control, SATA Host Control, and/or microprocessor  
24 global control circuits. *See* Ex. 4, ASM1153 Webpage Description, p. 1 (“ . . .  
25 ASM1153 . . . also integrates an 8-bit micro-processor and embedded RAM. . .”).  
26 The exemplary global control circuits are coupled to the input/output interface,  
27 such as by a bus. *See* Ex. 6, ASM1053 Datasheet.  
28

1           24. The bridging circuit includes a translate circuit coupled to the global  
2 control circuit. For example, the microprocessor includes the translate circuit. *See*  
3 Ex. 4, ASM1153 Webpage Description, p. 1 (“Customers can easily enhance their  
4 storage device performance with ASM1153 since it also integrates an 8-bit micro-  
5 processor and embedded RAM to provide a cutting edge solution in USB to SATA  
6 device enclosure market.”). The microprocessor is coupled to the global control  
7 circuit, such as by a bus.

8           25. The bridging circuit includes a disk interface coupled to the ram  
9 control circuit and the translate circuit. *See* Ex. 4, ASM1153 Webpage  
10 Description, p. 1 (“ASM1153 is the ASMedia third generation single chip solution,  
11 bridging the USB3.2 Gen1 to Serial SATA host interface with highly integrated  
12 SuperSpeed USB3.0, High Speed USB2.0 and SATA1.5/3.0 Gbps ASMedia self  
13 -designed PHYs.”); *see also* Ex. 6, ASM1053 Datasheet. The exemplary disk  
14 interface is coupled to the RAM control circuit and the translate circuit, such as by  
15 a bus.

16           26. The Accused Products include a USB connector port for outputting  
17 the USB signals to the host motherboard. *See* Ex. 2, Photograph showing  
18 secondary board in the Silicon Power Armor A60 Portable HD having a USB  
19 connector output port.

20           27. On information and belief, Silicon Power has induced infringement of  
21 the '485 Patent pursuant to 35 U.S.C. § 271(b), by actively and knowingly  
22 inducing, directing, causing, and encouraging others, including, but not limited to,  
23 its partners, resellers, distributors, customers, and end users, to make, use, sell,  
24 and/or offer to sell in the United States, and/or import into the United States, the  
25 Accused Products by, among other things, providing the accused products and  
26 incorporated USB Bridging technology, specifications, instructions, manuals,  
27 advertisements, marketing materials, and technical assistance relating to the  
28

1 installation, set up, use, operation, and maintenance of said products.

2 28. On information and belief, Silicon Power has committed and  
3 continues to commit the foregoing infringing activities without a license.

4 29. On information and belief, Silicon Power knew the '485 Patent  
5 existed and knew of an exemplary infringing Silicon Power product while  
6 committing the foregoing infringing acts thereby willfully, wantonly and  
7 deliberately infringing the '485 Patent.

8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiff USBB prays for the judgment in its favor against  
10 Silicon Power, and specifically, for the following relief:

- 11 A. Entry of judgment in favor of USBB against Silicon Power on all  
12 counts;
- 13 B. Entry of judgment that Silicon Power has infringed the Patent-in-Suit;
- 14 C. Entry of judgment that Silicon Power's infringement of the Patent-in-  
15 Suit has been willful;
- 16 D. Award of compensatory damages adequate to compensate USBB for  
17 Silicon Power's infringement of the Patent-in-Suit, in no event less than a  
18 reasonable royalty trebled as provided by 35 U.S.C. § 284;
- 19 E. USBB's costs;
- 20 F. Pre-judgement and post-judgement interest on USBB's award; and
- 21 G. All such other and further relief as the Court deems just or equitable.

22 **DEMAND FOR JURY TRIAL**

23 Pursuant to Rule 38 of the Fed. R. Civ. P., Plaintiff USBB hereby demands  
24 trial by jury in this action of all claims so triable.

25  
26  
27  
28



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

June 27, 2022

Respectfully Submitted,

By: /s/ Dmitry Kheyfits

Dmitry Kheyfits  
dkheyfits@kblit.com  
**KHEYFITS BELENKY LLP**  
4 Embarcadero Center, Suite 1400  
San Francisco, California 94111  
Tel: 415-429-1739  
Fax: 415-429-6347

*Attorneys for Plaintiff*  
*USB Bridge Solutions, LLC*