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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 Vector Licensing LLC,
13
14 Plaintiff,
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16 v.
17
18 Edimax Computer Company,
19
20 Defendant.

CASE NO.

COMPLAINT FOR INFRINGEMENT

JURY TRIAL DEMANDED

21 **COMPLAINT FOR PATENT INFRINGEMENT**

22 Now comes, Plaintiff Vector Licensing LLC (“Plaintiff” or “Vector”), by
23 and through undersigned counsel, and respectfully alleges, states, and prays as
24 follows:

25 **NATURE OF THE ACTION**

26 1. This is an action for patent infringement under the Patent Laws of the
27 United States, 35 U.S.C. § 1 et seq.

1 **THE PARTIES**

2 2. Plaintiff Vector Licensing LLC is a limited liability company with
3 its principal place of business at 1201 Barbara Jordan Blvd., Suite 700 #1005,
4 Austin, TX 78723.

5 3. Upon information and belief, Defendant Edimax Computer Company
6 (“Edimax” or “Defendant”) is a corporation organized under the laws of California,
7 and has a regular and established place of business at 530 Technology Drive, Suite
8 100, Irvine, CA 92618. On information and belief service of summons can be
9 made to 1505 Corporation 1739, Northwest Registered Agent, Inc., 2108 N. Street
10 Ste. N, Sacramento, CA 95816-5712.

11 **JURISDICTION AND VENUE**

12 4. This is an action for patent infringement in violation of the Patent Act
13 of the United States, 35 U.S.C. §§1 *et seq.*

14 5. The Court has subject matter jurisdiction over this action pursuant to
15 28 U.S.C. §§1331 and 1338(a).

16 6. This Court has personal jurisdiction over Defendant by virtue of its
17 systematic and continuous contacts with this jurisdiction and its residence in this
18 District, as well as because of the injury to Plaintiff, and the cause of action against
19 Plaintiff has risen in this District, as alleged herein.

20 7. Defendant is subject to this Court’s specific and general personal
21 jurisdiction pursuant to its substantial business in this forum, including: (i) at least
22 a portion of the infringements alleged herein; (ii) regularly doing or soliciting
23 business, engaging in other persistent courses of conduct, and/or deriving
24 substantial revenue from goods and services provided to individuals in California
25 and in this judicial District; and (iii) having an established place of business in this
26 judicial district.

1 exemplary claims of the '655 Patent also identified in the charts incorporated into
2 this Count below (the "Exemplary '655 Patent Claims," including Claims 1 and 7)
3 literally or by the doctrine of equivalents. On information and belief, numerous other
4 devices that infringe the claims of the '655 Patent have been made, used, sold,
5 imported, and offered for sale by Defendant and/or its customers.

6 14. Upon information and belief, Defendant also has directly infringed,
7 literally or under the doctrine of equivalents, the Exemplary '655 Patent Claims, by
8 having its employees internally test and use these Exemplary Products.

9 15. Exhibit B includes charts comparing the Exemplary '655 Patent Claims
10 to the Exemplary Defendant Products. As set forth in these charts, the Exemplary
11 Defendant Products practice the technology claimed by the '655 Patent.
12 Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy
13 all elements of the Exemplary '655 Patent Claims.

14 16. Plaintiff therefore incorporates by reference in its allegations herein the
15 claim charts of Exhibit B.

16 **JURY DEMAND**

17 17. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff
18 respectfully requests a trial by jury on all issues so triable.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff prays for the following relief:

- 21 A. A Declaration that Defendant has infringed the '665 Patent;
22 B. An award of damages suffered by Plaintiff as a result of Defendant's
23 infringement of the '665 Patent;
24 C. An award to Plaintiff of its costs, attorney's fees, expenses, and interest; and
25 D. A grant to Plaintiff of any further relief as the Court finds appropriate.

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Respectfully Submitted,

Dated: November 30, 2022

/s/ Jennifer Ishimoto
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