

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

IFPOWER CO., LTD.,

Plaintiff,

v.

RAZER INC.,

Defendant.

CASE NO. 1:24-cv-00130

JURY TRIAL DEMANDED

PLAINTIFF’S ORIGINAL COMPLAINT

Plaintiff IFPower Co., Ltd. (“IFPower” or “Plaintiff”) hereby files its Original Complaint against Defendant Razer Inc., (“Defendant” or “Razer”) alleging infringement of U.S. Patent Nos. 7,298,361 (the “’361 Patent”) and 7,863,860 (the “’860 Patent”) (collectively, the “Patents-in-Suit”).

I. PARTIES

1. Plaintiff IFPower is a company existing under the laws of Taiwan, with its principal place of business located 1 F., No. 2, Ln. 18, Shuangyuan St., Wanhua Dist., Taipei City 10884, Taiwan (R.O.C.).

2. Upon information and belief, Defendant Razer Inc. is a corporation organized under the laws of the Cayman Islands. Upon information and belief, Defendant is authorized to do business in Texas and has an established place of business in this District at 11401 Century Oaks Terrace, Suite 125, Austin, Texas 78758. Defendant may be served with process through its Registered Office, Maples Corporate Services Limited, P.O. Box 309 Ugland House, Grand Cayman KY1-1104, Cayman Islands.

ORIGINAL COMPLAINT

II. JURISDICTION AND VENUE

3. This is an action for patent infringement which arises under 35 U.S.C. §§ 271, 281, 284 and 285. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant because, upon information and belief, Defendant transacts substantial business in the State of Texas and in this District. Defendant, directly and through subsidiaries or intermediaries (including distributors, retailers, resellers, and others), has purposefully and voluntarily placed one or more of its infringing products, as described below, into the stream of commerce with the expectation that these infringing products will be purchased and used by customers in the District. Defendant has committed acts of patent infringement within the District.

5. This Court has personal jurisdiction over Defendant because it has committed acts giving rise to this action within the State of Texas and within this District. The Court's exercise of jurisdiction over Defendant would not offend traditional notions of fair play and substantial justice because Defendant has established minimum contacts with the forum with respect to both general and specific jurisdiction.

6. This Court has personal jurisdiction over Defendant pursuant to TEX. CIV. PRAC. & REM. CODE § 17.041 et seq. General personal jurisdiction exists over Defendant because Defendant has minimum contacts with this forum as a result of business regularly conducted within the State of Texas and within this District, and, on information and belief, specific personal jurisdiction exists because Defendant has, at least, committed the tort of patent infringement within Texas and this District. Personal jurisdiction also exists because, on information and belief, Defendant has: (1) operated the Internet website, <https://www.razer.com/>, which is available to

and accessed by users, customers, and potential customers of Defendant within this judicial district; (2) sold Defendant's products within this judicial district; (3) transacted business within the State of Texas; (4) actively infringed and/or induced infringement in Texas; (5) established regular and systematic business contacts within the State of Texas; and (6) continue to conduct such business in Texas through the sale of Defendant's wireless charging products. Accordingly, this Court's exercise of jurisdiction over Defendant comports with the constitutional standards of fair play and substantial justice and arises directly from the Defendant's purposeful minimum contacts within the State of Texas.

7. This Court also has personal jurisdiction over Defendant because, on information and belief, Defendant, its authorized resellers (or those acting on their behalf), and its customers have committed and continue to commit acts of patent infringement in this judicial district. Defendant transacts business within the State of Texas and in this judicial district and has committed acts of patent infringement within the State of Texas and this judicial district as set forth hereinafter. Such business includes, without limitation, Defendant's operation of the Internet website, <https://www.razer.com/>, which is available to and accessed by users, customers, and potential customers of Defendant within this judicial district, and the sale of Defendant's products within this judicial district, both online at <https://www.razer.com/> and through other official online stores, resellers/retail stores, and varied dealers within this jurisdiction.

8. Venue is proper in this Court pursuant to 28 U.S.C. §§1391(b), (c), and 1400. Defendant has an established place of business in this District, including at 11401 Century Oaks Terrace, Suite 125, Austin, Texas 78758.

9. In addition, Defendant has sold, advertised, marketed, and distributed products in this district that practice the claimed inventions of the Patents. Defendant derives substantial

revenue from the sale of infringing products distributed within the district, and/or expects or should reasonably expect its actions to have consequences within the district and derives substantial revenue from interstate and international commerce.

10. Alternatively, venue is proper in this District pursuant to 28 U.S.C. § 1391 (c)(3) because it is a judicial district in which Defendant is subject to personal jurisdiction at the time the action is commenced, and there is no district in which the action may otherwise be brought.

III. FACTUAL BACKGROUND

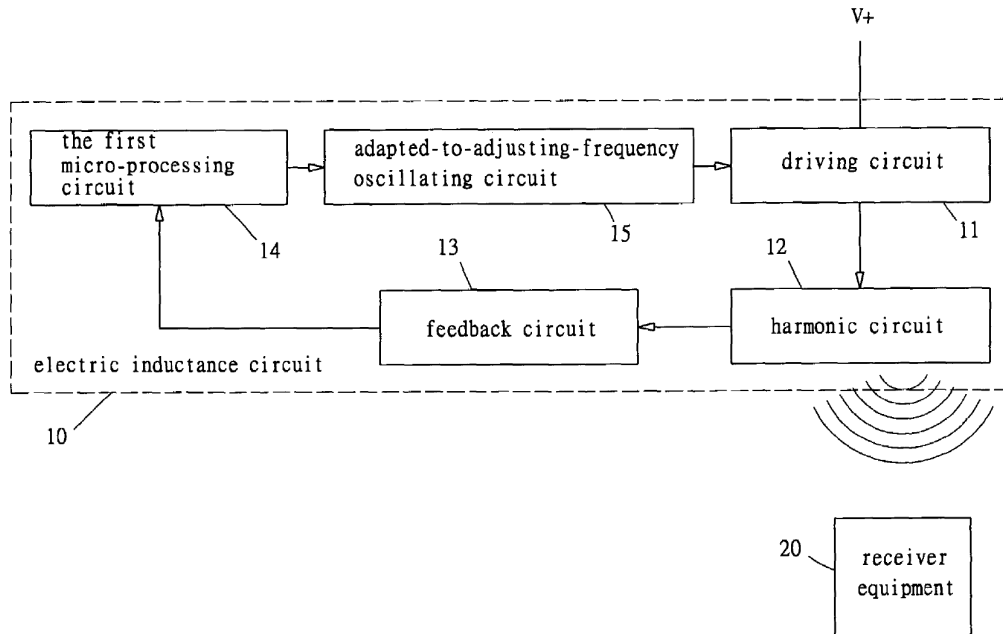
PATENTS-IN-SUIT

11. IFPower is the owner of all right, title, and interest in and to U.S. Patent No. 7,298,361 (attached as **Exhibit 1**), entitled “Non-Contact Electric Inductance Circuit for Power Source,” issued on November 20, 2007.

12. IFPower is the owner of all right, title, and interest in and to U.S. Patent No. 7,863,860 (attached as **Exhibit 2**), entitled “Battery Cover,” issued on January 4, 2011.

TECHNICAL OVERVIEW

13. The '361 Patent is directed to a non-contact inductance circuit for a power source. The inductance circuit converts input alternating current into signals with a high-frequency harmonic vibration. The alternating electric current passes through an amplifier.



'361 Patent, Fig. 1.

14. During operation, a feedback circuit **13** transmits the voltage or current of the harmonic circuit to a processor to analyze the value of the detected voltage or current.

15. Conventional chargers for electronic devices with rechargeable batteries such as computer mice or smartphones required a physical cable connection between the power supply and the electronic device.

16. Prior art wireless chargers used harmonic vibration energy provided by alternating signals from a coil. That energy is converted into electrical energy by the receiving device. '361 patent, 1:17-24. This is accomplished through interoperations of an internal inductance and an internal capacitor. *Id.*, 1:38-43.

17. Even for inductors and capacitors with a given specification, however, there are practical operating ranges that reflect some differences during operation. As a result, mismatches between characteristics arise which reduce the efficiency of the circuit or require repeated and cumbersome adjustment. *Id.*, 1:43-56.

18. The inventions are thus directed to a nonconventional feedback and adapted-to-adjusting frequency oscillating circuit for physical, wireless chargers.

When in operation, the adapted-to-adjusting-frequency oscillating circuit generates alternating electric current that passes to the harmonic circuit after being amplified through the driving circuit, and the feedback circuit transmits the voltage or the current of the harmonic circuit to the microprocessing circuit that analyses the value of the voltage or the current detected, then the adapted-to-adjusting-frequency oscillating circuit adjusts the frequency of subsequent input alternating electric current, in order that the entire electric inductance circuit for the power source can generate the best harmonic frequency.

Id., 2:5-15.

19. Additionally, in certain embodiments, the inductance circuit is further integrated with a signal processing circuit. In this way, the electric inductance circuit for the power source can be used for radio signal transmission. *Id.* 15 2:16-24.

20. The '860 Patent is directed to wireless charging, whereby a device incorporating the inventions claimed therein can be charged without a cable between the device and charger or removing internal batteries.

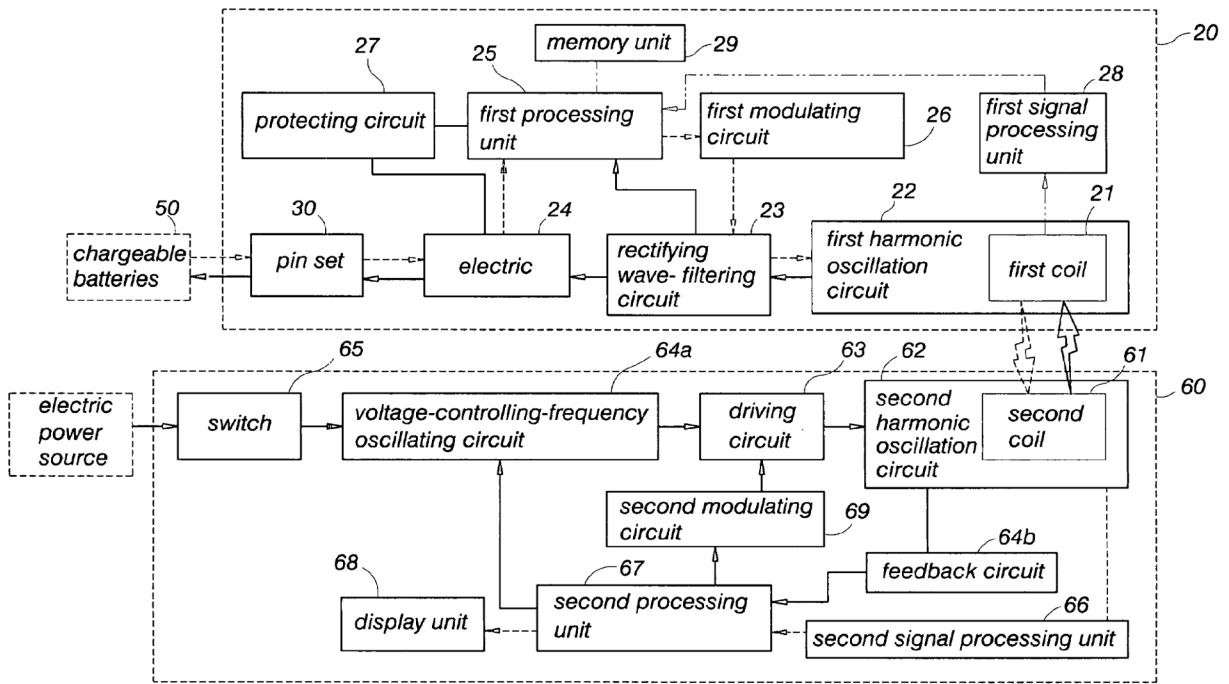
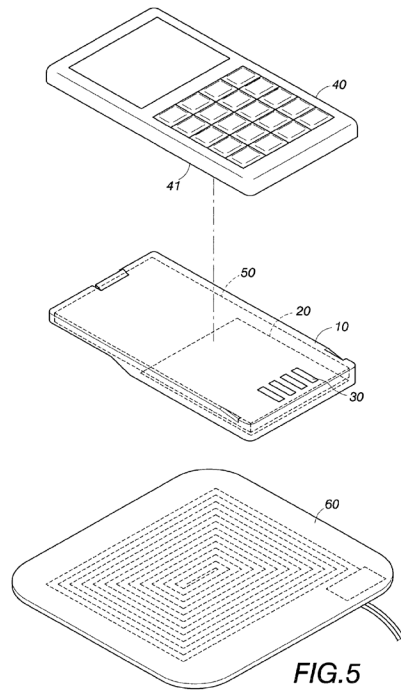


FIG. 4

'860 Patent, Fig. 4.

21. The invention provides a battery cover with circuitry adapted to wireless couple to an RF (radio frequency) emitter for generating electric power for charging a battery by a non-touch induction mode.



'860 Patent, Fig. 5.

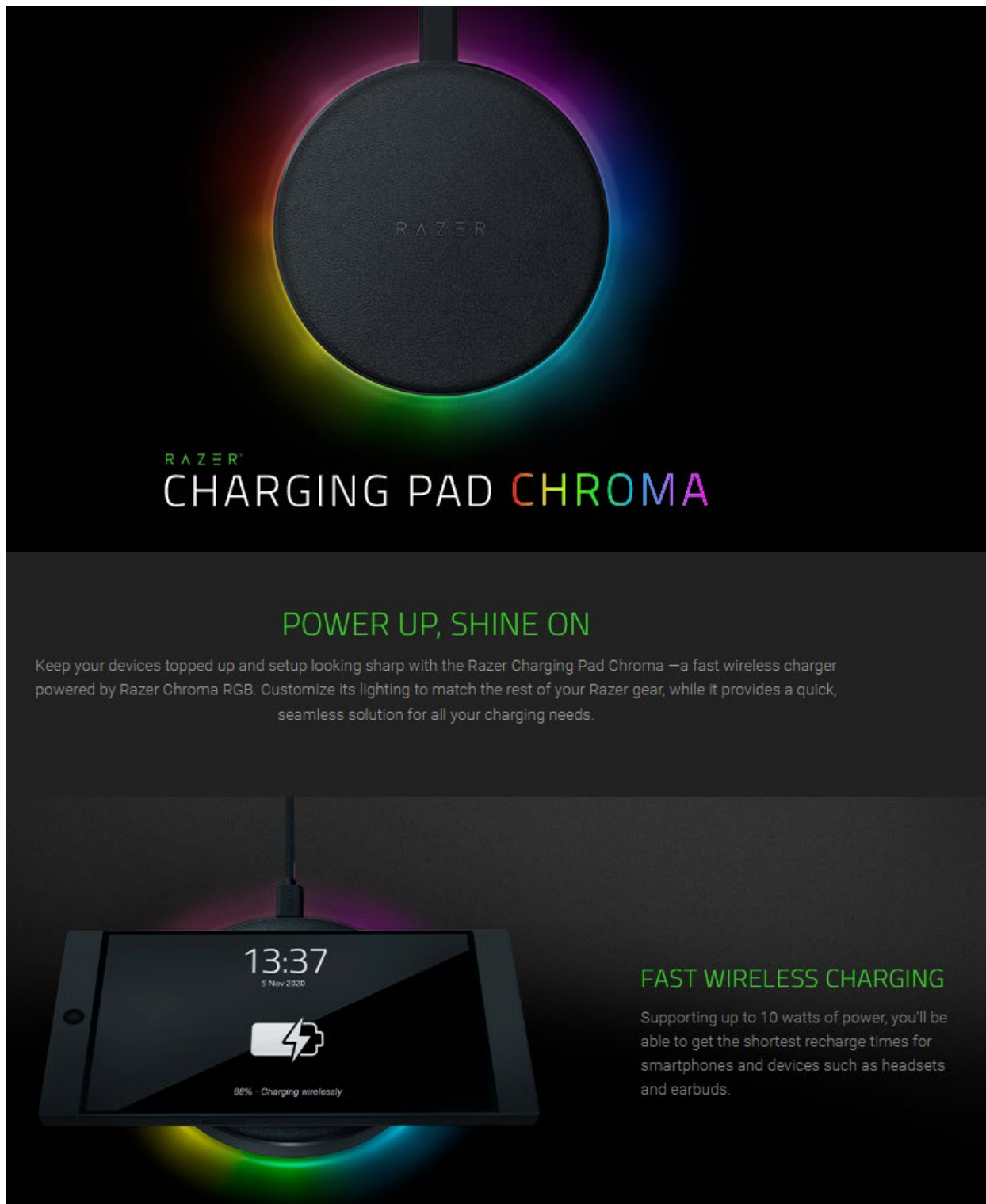
22. The '860 Patent claims priority to a Taiwanese application filed on June 29, 2007.

23. The WPC published the Qi low-power specification over two years later, in August 2009.

DEFENDANT'S ACTS

24. Defendant is a provider of consumer electronics products offering wireless charging in accordance with certain WPC Qi wireless charging standards.

25. For example, Defendant's wireless chargers comply with the Qi wireless charging standard.

The advertisement features a central image of the Razer Charging Pad Chroma, a circular black device with a glowing rainbow-colored ring around its perimeter. The word "RAZER" is embossed on the top surface. Below this, the product name "RAZER CHARGING PAD CHROMA" is displayed in a white and multi-colored font. A section titled "POWER UP, SHINE ON" in green text describes the device as a fast wireless charger with customizable RGB lighting. A second image shows a smartphone on the pad, with its screen displaying the time 13:37, the date 5 Nov 2020, a battery icon with a lightning bolt, and the text "88% - Charging wirelessly". To the right of this image, a section titled "FAST WIRELESS CHARGING" in green text states that the pad supports up to 10 watts of power for smartphones, headsets, and earbuds.

RAZER
CHARGING PAD CHROMA

POWER UP, SHINE ON

Keep your devices topped up and setup looking sharp with the Razer Charging Pad Chroma —a fast wireless charger powered by Razer Chroma RGB. Customize its lighting to match the rest of your Razer gear, while it provides a quick, seamless solution for all your charging needs.

FAST WIRELESS CHARGING

Supporting up to 10 watts of power, you'll be able to get the shortest recharge times for smartphones and devices such as headsets and earbuds.

<https://www.razer.com/mobile-accessories/razer-charging-pad-chroma>

26. Defendant represents compliance to its customers and instructs them how to wirelessly charge using the Qi charging standard.



QI-ID

QI-9703

LICENSED

YES

SPECIFICATION VERSION

1.2.4

BRAND

RAZER

PRODUCT NAME

Wireless Charger

PRODUCT URL

<http://razerzone.com/>

DESCRIPTION

RAZER™ CHARGING PAD CHROMA

MANUFACTURER PART NUMBER

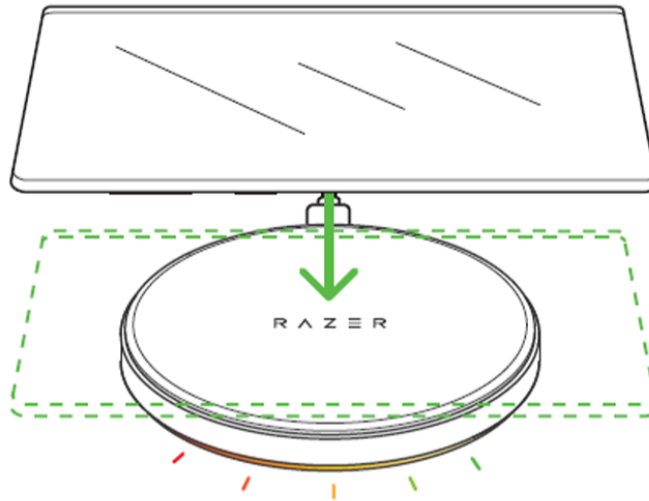
RC21-0160

<https://wirelesspowerconsortium.atlassian.net/servicedesk/customer/portal/12/article/30348638>

27. Infringing products provided by Defendant include Razer Mouse Dock Pro, Razer Charging Pad Chroma, Razer Wireless Charging Puck, Basilisk V3 Pro, Cobra Pro, Naga V2 Pro, and all products made, used, or sold by Defendant with substantially similar wireless charging capabilities.

28. Defendant further instructs and encourages its customers to wirelessly charge their products as it specifies in its documentation.

2. Place your smartphone on the center of the charging pad. The underglow lighting will display a slow wave of colors to indicate that it is now charging your smartphone.



i When fast charging (10W), the underglow lighting will display a rapid wave of colors.

If the underglow lighting continuously flashes in red (a charging error), check if your smartphone is compatible and/or properly placed at the center of the charging surface.

Razer Charging Pad Chroma 10W Fast Wireless Charger User Guide, p. 7.

29. On information of belief, Defendant also implements contractual protections in the form of license and use restrictions with its customers to preclude the unauthorized reproduction, distribution, and modification of its products.

30. Moreover, on information and belief, Defendant implements technical precautions to attempt to thwart customers who would circumvent the intended operation of Defendant's products.

IV. PATENT INFRINGEMENT

COUNT I — INFRINGEMENT OF U.S. PATENT NO. 7,298,361

31. Defendant has directly infringed and continues to infringe one or more claims of the '361 Patent in this judicial district and elsewhere in the United States by, among other things,

making, having made, importing, using, offering for sale, and/or selling the claimed system and methods of the '361 Patent.

32. At a minimum, Defendant has been, and now is, infringing claims of the '361 Patent by making, importing and/or using infringing systems and/or methods. Defendant infringes at least claim 1 of the '361 Patent.

33. The infringing products include, but are not limited to, Defendant's wireless chargers such as the Razer Mouse Dock Pro, Razer Charging Pad Chroma, Razer Wireless Charging Puck, and all products made, used, or sold by Defendant with substantially similar wireless charging capabilities, including when used in conjunction with Qi-compliant devices (the "'361 Infringing Products"). IFPower alleges that each and every element is literally present in the '361 Infringing Products. To the extent not literally present, IFPower reserves the right to proceed under the doctrine of equivalents.

34. More specifically, Defendant's wireless chargers include a non-contact electric inductance circuit for power source wherein a circuit amplifies an alternating current by an oscillator through a driving circuit and pass to a harmonic circuit.

35. In accordance with the WPC specification, the electric inductance circuit has a feedback circuit, a micro-processing circuit and an adapted-to-adjusting-frequency oscillating circuit integrated with one another.

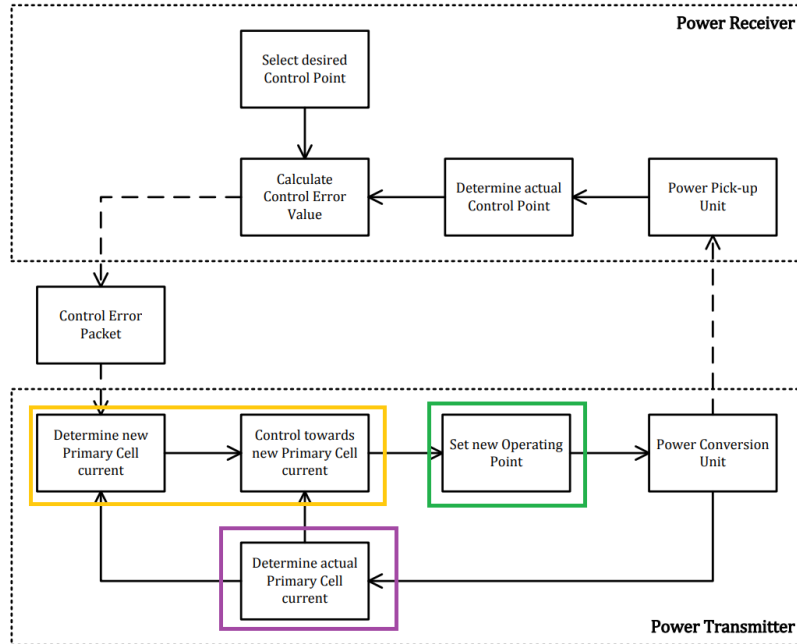


Figure 5-2: Power transfer control loop

<https://cupdf.com/document/wpc-specification.html>

36. Defendant's wireless chargers further include a wireless charging controller.

37. Defendant has indirectly infringed and continues to infringe the '361 Patent by inducing the infringement of the '361 Patent. With knowledge of the '361 Patent, Defendant directs and aids its customers in using the '361 Infringing Products by the provision of its products and software, and related equipment and provision of instruction (including, by way of example, the tutorials, user guides, product guides, and other documentation located at <https://support.razer.com/?c=us>) to customers as well as functionality embedded in the '361 Infringed Products (including firmware and source code) with knowledge that the induced acts constitute patent infringement. When a user of one of the '361 Infringing Products charges a Qi-compliant device, the '361 Infringing Product operates in an infringing manner. Defendant possesses specific intent to encourage infringement by its customers.

38. Defendant has contributed to the infringement of, and continues to contribute to the infringement of, one or more claims of the '361 Patent under 35 U.S.C. § 271(c) and/or 271(f), either literally and/or under the doctrine of equivalents, by selling, offering for sale, and/or importing into the United States, the '361 Infringing Products. Defendant knows that the components of the '361 Infringing Products: constitute a material part of the inventions claimed in the '361 Patent; are especially made or adapted to infringe the '361 Patent; and are not staple articles or commodities of commerce suitable for non-infringing use, but rather the Components are used for or in systems that infringe one or more claims of the '361 Patent. The hardware and/or software Components are not a staple article or commodity of commerce because they are specifically designed to perform the claimed functionality. These products are specifically designed for their infringing purpose, namely wireless charging in accordance with the claims of the '361 Patent. Any other use of the hardware and/or software Components would be unusual far-fetched, illusory, impractical, occasional, aberrant, or experimental.

39. IFPower has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to IFPower in an amount that adequately compensates it for Defendant's infringements, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II — INFRINGEMENT OF U.S. PATENT NO. 7,863,860

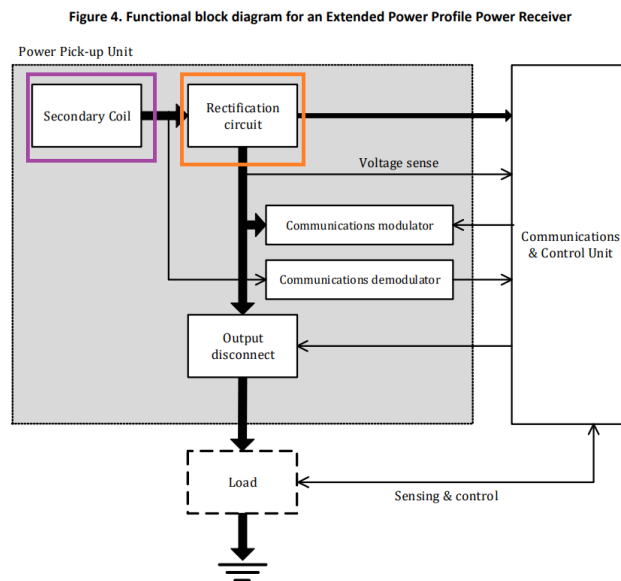
40. Defendant has directly infringed and continues to infringe one or more claims of the '860 Patent in this judicial district and elsewhere in the United States by, among other things, making, having made, importing, using, offering for sale, and/or selling the claimed system and methods of the '860 Patent.

41. At a minimum, Defendant has been, and now is, infringing claims of the '860 Patent by making, importing and/or using wireless chargers that comply with the Qi wireless standard. Defendant's chargers are designed to interact with a battery cover of the type claimed in the '860 Patent. Defendant infringes at least claim 1 of the '860 Patent.

42. Defendant's infringing products include, but are not limited to, Basilisk V3 Pro, Cobra Pro, Naga V2 Pro, and all products made, used, or sold by Defendant with substantially similar wireless charging capabilities (the "'860 Infringing Products"). The '860 Infringing Products are specifically designed to interoperate with a battery cover as claimed. Defendant puts the infringing system into use as a whole. On information and belief, Defendant tests the '860 Infringing Products to ensure that battery covers meeting specified criteria are used in conjunction with its products.

43. Defendant instructs its users how to perform wireless charging with their devices using the '860 Infringing Products.

44. In accordance with the WPC specification, devices interacting with the '860 Infringing Products includes a rectifying wave filtering circuit.



<https://www.wirelesspowerconsortium.com/data/downloadables/3/3/2/3/qi-v13-public.zip>

45. IFPower alleges that each and every element is literally present in the '860 Infringing Products. To the extent not literally present, IFPower reserves the right to proceed under the doctrine of equivalents.

46. Defendant has indirectly infringed and continues to infringe the '860 Patent by inducing the infringement of the '860 Patent. With knowledge of the '860 Patent, Defendant directs and aids its customers in using the '860 Infringing Products by the provision of its products and software, and related equipment and provision of instruction (including, by way of example, the tutorials, user guides, product guides, and other documentation located at <https://support.razer.com/?c=us>) to customers as well as functionality embedded in the '860 Infringed Products (including firmware and source code) with knowledge that the induced acts constitute patent infringement. When a user of one of the '860 Infringing Products charges the device, the '860 Infringing Product operates in an infringing manner. Defendant possesses specific intent to encourage infringement by its customers.

47. Defendant has contributed to the infringement of, and continues to contribute to the infringement of, one or more claims of the '860 Patent under 35 U.S.C. § 271(c) and/or 271(f), either literally and/or under the doctrine of equivalents, by selling, offering for sale, and/or importing into the United States, the '860 Infringing Products. Defendant knows that the components of the '860 Infringing Products: constitute a material part of the inventions claimed in the '860 Patent; are especially made or adapted to infringe the '860 Patent; and are not staple articles or commodities of commerce suitable for non-infringing use, but rather the Components are used for or in systems that infringe one or more claims of the '860 Patent. These products are specifically designed for their infringing purpose, namely wireless charging in accordance with

the claims of the '860 Patent. The hardware and/or software Components are not a staple article or commodity of commerce because they are specifically designed to perform the claimed functionality. Any other use of the hardware and/or software Components would be unusual far-fetched, illusory, impractical, occasional, aberrant, or experimental.

48. IFPower has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to IFPower in an amount that adequately compensates it for Defendant's infringements, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

V. WILLFULNESS

49. Defendant was provided notice of its infringement and IFPower's claims at least as early as its receipt of the Original Complaint filed against it.

50. Defendant acted and continues to act with knowledge of the Patents-in-Suit despite an objectively high likelihood that its actions constituted infringement of IFPower's valid patent rights.

51. This objectively defined risk was either known or so obvious that it should have been known to Defendant. IFPower seeks enhanced damages pursuant to 35 U.S.C. §284.

VI. JURY DEMAND

52. IFPower demands a trial by jury of all matters to which it is entitled to trial by jury, pursuant to FED. R. CIV. P. 38.

VII. PRAYER FOR RELIEF

53. WHEREFORE, Plaintiff IFPower prays for judgment and seeks relief against Defendant as follows:

- a. Judgment that one or more claims of the Patents-in-Suit have been infringed, either literally and/or under the doctrine of equivalents;
- b. Award Plaintiff past and future damages together with prejudgment and post-judgment interest to compensate for the infringement by Defendant of the Patents-in-Suit in accordance with 35 U.S.C. §284, and increase such award by up to three times the amount found or assessed in accordance with 35 U.S.C. §284;
- c. That the Court declare this an exceptional case and award Plaintiff its reasonable attorney's fees and costs in accordance with 35 U.S.C. § 285; and
- d. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

Dated: February 5, 2024

Respectfully submitted,

/s/ Andrew G. DiNovo

Andrew G. DiNovo

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ORIGINAL COMPLAINT