IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LITL LLC, Plaintiff, v. DELL TECHNOLOGIES INC., and DELL INC., Defendants.	Civil Action No. _____ **JURY TRIAL DEMANDED**

COMPLAINT

Plaintiff LiTL LLC ("Plaintiff" or "LiTL") brings this action for patent infringement against Defendants Dell Technologies Inc. and Dell Inc. (collectively, "Defendants" or "Dell").

INTRODUCTION

1. This is a civil action for patent infringement under the laws of the United States, 35 U.S.C. § 1, et seq.

2. Defendants have infringed and continue to infringe one or more claims of U.S. Patent Nos. 8,289,688 ("the '688 patent"); 8,624,844 ("the '844 patent"); 9,563,229 ("the '229 patent "); 10,289,154 ("the '154 patent"); 9,003,315 ("the '315 patent"); 9,880,715 ("the '715 patent"); 10,564,818 ("the '818 patent"); and 8,612,888 ("the '888 patent") (collectively, the "Asserted Patents") at least by making, using, selling, offering for sale, and importing into the United States computing devices that infringe one or more claims of each of the Asserted Patents.

3. LiTL is the legal owner by assignment of the entire right, title, and interest in and to the Asserted Patents, which were duly and legally issued by the United States Patent and

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Trademark Office ("USPTO"). LiTL seeks monetary damages and injunctive relief to address past and ongoing infringement of its valuable patent portfolio.

THE PARTIES

4. Plaintiff LiTL LLC is a Delaware company, having its principal place of business at 501 Boylston Street, Boston, Massachusetts 02116.

5. Defendant Dell Technologies Inc. is a corporation organized under the laws of the State of Delaware, with a place of business at One Dell Way, Round Rock, Texas 78682.

6. Defendant Dell Inc., a subsidiary of Dell Technologies Inc., is a corporation organized under the laws of the State of Delaware, with a place of business at One Dell Way, Round Rock, Texas 78682.

JURISDICTION AND VENUE

7. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. This Court has personal jurisdiction over Dell. Defendants are subject to general personal jurisdiction in the State of Delaware because they are incorporated in the State of Delaware.

9. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Defendants are incorporated in this District. Upon information and belief, Defendants have transacted business in this District and have committed acts of direct and indirect infringement in this District by, among other things, making, using, offering to sell, selling, and/or importing products that infringe the Asserted Patents.

FACTUAL BACKGROUND

LiTL's Patented Technologies

10. In 2007, John Chuang had a vision for a new type of computer. He recognized that traditional computers are designed to meet the needs of everyone from a six year old to the largest employers on earth. Mr. Chuang set out to build a computer for the home that offered a simplified operating environment. Mr. Chuang founded LiTL and assembled a team of hardware and software engineers and user interface designers to achieve his vision.

11. LiTL developed a webbook, a portable computing device, which launched in 2009. LiTL focused on how a family typically uses the Internet in the home, and optimized the webbook's user interface for consuming Internet content.

http://web.archive.org/web/20091204052449/http://www.litl.com/essays/hardware.htm

12. The webbook provided multiple display modes. In laptop mode, users access a keyboard and touchpad to browse the Internet and access apps that can be arranged as a set of cards.

http://web.archive.org/web/20091204052449/http://www.litl.com/essays/hardware.htm

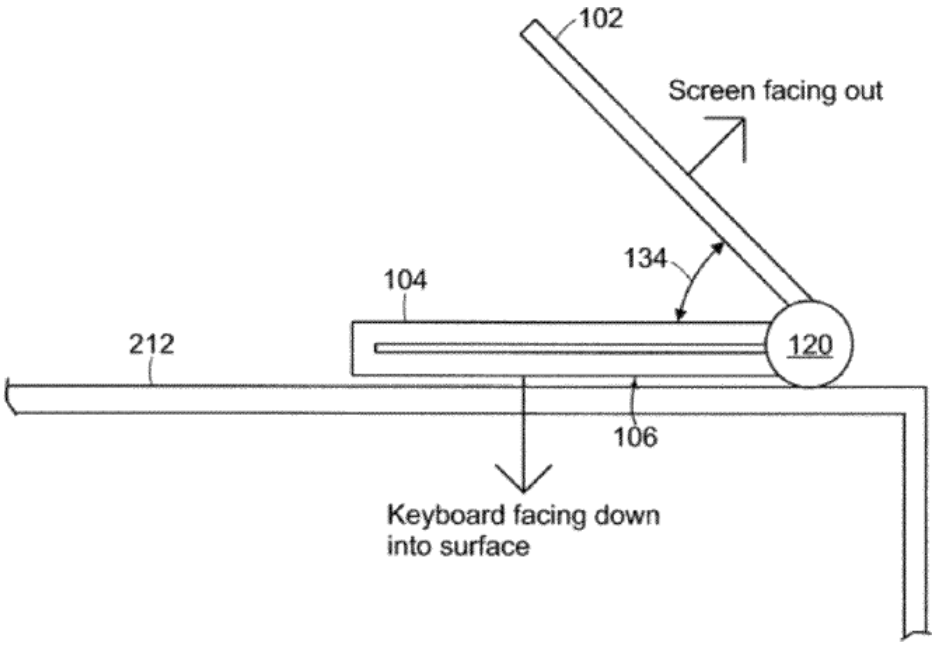
13. Rotating the webbook display into “easel mode” allows users to easily consume content from the Internet via a streamlined, intuitive interface.

http://web.archive.org/web/20091201114605/http://www.litl.com/easy-to-use/intuitive-interface.htm

14. In easel mode the webbook's keyboard faces away from the user, and content is enlarged on the display for easier viewing from further away.

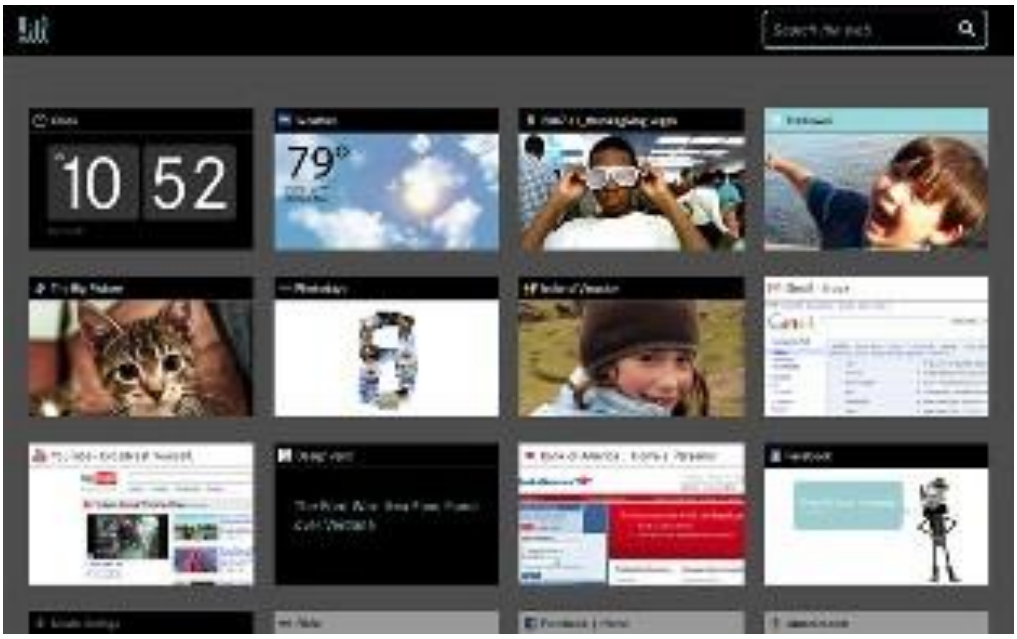
http://web.archive.org/web/20130420102239/http://litl.com/webbook/meet-webbook/more-fun.htm

15. The webbook can also be configured in "frame mode," in which the keyboard faces down into the surface on which the webbook rests.



’688 patent, Figure 26.

16. The webbook delivers content from a user’s favorite websites via “channels” to provide an experience that resembles watching television.



http://web.archive.org/web/20091204052453/http://www.litl.com/essays/software.htm

17. LiTL's investment in innovation has produced a portfolio that includes over 30 patents in the United States as well as additional patents in other countries across the globe.

LiTL's Asserted Patents

18. This complaint focuses on eight LiTL patents directed to various aspects of computing devices that can be used in multiple display modes.

19. LiTL is the current owner by assignment of the entire right, title, and interest in and to the '688 patent titled "Portable computer with multiple display configurations." The '688 patent was duly and legally issued on October 16, 2012. The patent is generally directed to portable computers configurable between a plurality of display modes. A copy of the '688 patent is attached as Exhibit A.

20. LiTL is the current owner by assignment of the entire right, title, and interest in and to the '844 patent titled "Portable computer with multiple display configurations." The '844 patent was duly and legally issued on January 7, 2014. The patent is generally directed to portable

computers configurable between a plurality of display modes. A copy of the ’844 patent is attached as Exhibit B.

21. LiTL is the current owner by assignment of the entire right, title, and interest in and to the ’229 patent titled “Portable computer with multiple display configurations.” the ’229 patent was duly and legally issued on February 7, 2017. The patent is generally directed to portable computers configurable between a plurality of display modes. A copy of the ’229 patent is attached as Exhibit C.

22. LiTL is the current owner by assignment of the entire right, title, and interest in and to the ’154 patent titled “Portable computer with multiple display configurations.” The ’154 patent was duly and legally issued on May 14, 2019. The patent is generally directed to portable computers configurable between a plurality of display modes. A copy of the ’154 patent is attached as Exhibit D.

23. LiTL is the current owner by assignment of the entire right, title, and interest in and to the ’315 patent titled “System and method for streamlining user interaction with electronic content.” The ’315 patent was duly and legally issued on April 7, 2015. The patent is generally directed to a user interface configured to display a plurality of views of computer content. A copy of the ’315 patent is attached as Exhibit E.

24. LiTL is the current owner by assignment of the entire right, title, and interest in and to the ’715 patent titled “System and method for streamlining user interaction with electronic content.” The ’715 patent was duly and legally issued on January 30, 2018. The patent is generally directed to a user interface configured to display a plurality of views of computer content. A copy of the ’715 patent is attached as Exhibit F.

25. LiTL is the current owner by assignment of the entire right, title, and interest in and to the ’818 patent titled “System and method for streamlining user interaction with electronic content.” The ’818 patent was duly and legally issued on February 18, 2020. The patent is generally directed to a user interface configured to display a plurality of views of computer content. A copy of the ’818 patent is attached as Exhibit G.

26. LiTL is the current owner by assignment of the entire right, title, and interest in and to the ’888 patent titled “Method and apparatus for managing digital media content.” The ’888 patent was duly and legally issued on December 17, 2013. The patent relates generally to accessing and managing digital media libraries on streamlined computing devices with a plurality of selectable I/O profiles. A copy of the ’888 patent is attached as Exhibit H.

27. LiTL has complied with its obligations under 35 U.S.C. § 287 for each of the Asserted Patents.

28. The Asserted Patents are well-known to personal computing companies because the Asserted Patents and their published applications have been frequently cited during prosecution of patent applications owned by personal computing companies.

29. The Asserted Patents belong to a family whose members have been cited in over 1,000 third-party patents and published applications.

30. The ’688 patent and its corresponding published application have been cited in over 250 patents or published applications, including many that are assigned to major players in the personal computing space such as Dell.

31. The ’229, ’154, ’315, ’715, ’818 and ’888, patents are descendants of the ’688 patent.

32. Given the numerous patents directed to Dell's convertible (also referred to as "2-in-1") laptops, the citations to the '688 patent and corresponding published applications in Dell's own patent applications, on information and belief Dell was aware of each of the Asserted Patents before the filing of this Complaint and knew that Dell's convertible design infringes the Asserted Patents.

Dell's Incorporation of LiTL's Patented Technologies into Its Computing Devices

33. The allegations provided below are exemplary and without prejudice to LiTL's infringement contentions. In providing these allegations, LiTL does not convey or imply any particular claim constructions or the precise scope of the claims. LiTL's claim construction contentions regarding the meaning and scope of the claim terms will be provided under the Court's scheduling order and local rules.

34. The infringing products include, but are not limited to, Latitude 3120 2-in-1; Latitude 3189 2-in-1; Latitude 3190 2-in-1; Latitude 3310 2-in-1; Latitude 3330 2-in-1; Latitude 3379 2-in-1; Latitude 3390 2-in-1; Latitude 5289 2-in-1; Latitude 5300 2-in-1; Latitude 5310 2-in-1; Latitude 5320 2-in-1; Latitude 5330 2-in-1; Latitude 7310 2-in-1; Latitude 7330 2-in-1; Latitude 7389 2-in-1; Latitude 7390 2-in-1; Latitude 7400 2-in-1; Latitude 7410 2-in-1; Latitude 7420 2-in-1; Latitude 7430 2-in-1; Latitude 9330 2-in-1; Latitude 9410 2-in-1; Latitude 9420 2-in-1; Latitude 9430 2-in-1; Latitude 9510 2-in-1; Latitude 9520 2-in-1; Inspiron 3153 2-in-1; Inspiron 3158 2-in-1; Inspiron 3168 2-in-1; Inspiron 3169 2-in-2; Inspiron 3179 2-in-1; Inspiron 3185 2-in-1; Inspiron 3195 2-in-1; Inspiron 5368 2-in-1; Inspiron 5378 2-in-1; Inspiron 5379 2-in-1; Inspiron 5400 2-in-1; Inspiron 5406 2-in-1; Inspiron 5410 2-in-1; Inspiron 5481 2-in-1; Inspiron 5482 2-in-1; Inspiron 5485 2-in-1; Inspiron 5491 2-in-1; Inspiron 5568 2-in-1; Inspiron 5578 2-in-1; Inspiron 5579 2-in-1; Inspiron 5582 2-in-1; Inspiron 5591 2-in-1; Inspiron 7300 2-in-1; Inspiron 7306 2-in-1; Inspiron 7353 2-in-1; Inspiron 7359 2-in-1; Inspiron 7368 2-in-1;

Inspiron 7373 2-in-1; Inspiron 7375 2-in-1; Inspiron 7378 2-in-1; Inspiron 7386 2-in-1; Inspiron 7390 2-in-1; Inspiron 7391 2-in-1; Inspiron 7405 2-in-1; Inspiron 7415 2-in-1; Inspiron 7420 2-in-1; Inspiron 7425 2-in-1; Inspiron 7500 2-in-1; Inspiron 7506 2-in-1; Inspiron 7568 2-in-1; Inspiron 7569 2-in-1; Inspiron 7573 2-in-1; Inspiron 7579 2-in-1; Inspiron 7586 2-in-1; Inspiron 7590 2-in-1; Inspiron 7591 2-in-1; Inspiron 7620 2-in-1; Inspiron 7706 2-in-1; Inspiron 7773 2-in-1; Inspiron 7778 2-in-1; Inspiron 7779 2-in-1; Inspiron 7786 2-in-1; Inspiron 7791 2-in-1; XPS 13 7390 2-in-1; XPS 13 9310 2-in-1; XPS 13 9365 2-in-1; and XPS 15 9575 2-in-1 ("Accused Products"). The Accused Products are non-limiting examples that were identified based on publicly available information, and LiTL reserves the right to identify additional infringing activities, products and services, including, for example, on the basis of information obtained during discovery.

35. Dell distinguishes between their conventional laptops and convertible models by including the "2-in-1" designation in the product name. Dell's support website, https://www.dell.com/support/home/en-us, provides literature, service manuals, product specifications, user guides, and other materials that encourage customers to purchase the Accused Products and depict their multi-mode functionality. Dell provides a Service Manual and a Setup and Specifications documents that describe the convertible configurations of its Latitude, Inspiron and XPS products.

36. For example, the Setup and Specifications document for the Latitude 5330 covers both the conventional and convertible versions of this device, and describes the differences between the two configurations. The document depicts four user modes (i.e., notebook, tablet, tent, and stand) for the convertible configuration of the Latitude 5330.

See, e.g., https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf, pp. 10-12.

Table 3. Dimensions and weight

Description	Values
Height:	
Front height	16.92 mm (0.67 in.)
Rear height	18.43 mm (0.73 in.)
Width	305.70 mm (12.04 in.)
Depth	207.50 mm (8.17 in.)
Weight (minimum)	• Laptop: 1.20 kg (2.65 lb) • 2-in-1: 1.32 kg (2.91 lb) **NOTE:** The weight of your computer depends on the configuration ordered and manufacturing variability.

Id., p. 13 (distinguishing between the minimum weight between the "Laptop" and "2-in-1" configuration).

Table 20. Display specifications

Description		Option one	Option two	Option three	Option for 2-in-1 only
Display type		Full High Definition (FHD)	Full High Definition (FHD), low blue light	Full High Definition (FHD)	Full High Definition (FHD)
Display-panel technology		Wide Viewing Angle (WVA)	Wide-Viewing Angle (WVA)	Wide Viewing Angle (WVA)	Wide-Viewing Angle (WVA)
Display-panel dimensions (active area):					
	Height	165.24 mm (6.51 in.)	165.24 mm (6.51 in.)	165.24 mm (6.51 in.)	165.24 mm (6.51 in.)
	Width	293.76 mm (11.57 in.)	293.76 mm (11.57 in.)	293.76 mm (11.57 in.)	293.76 mm (11.57 in.)
	Diagonal	337.08 mm (13.27 in.)	337.08 mm (13.27 in.)	337.08 mm (13.27 in.)	337.08 mm (13.27 in.)
Display-panel native resolution		1920 x 1080	1920 x 1080	1920 x 1080	1920 x 1080
Luminance (typical)		250 nits	400 nits	300 nits	270 nits
Megapixels		2073600	2073600	2073600	2073600
Color gamut		45% NTSC typ.	100% sRGB typ.	72% NTSC typ.	100% sRGB typ.
Pixels Per Inch (PPI)		166	166	166	166
Contrast ratio (typical)		800:1	1000:1	700:1	600:1
Response time (max)		35 ms	35 ms	35 ms	35 ms
Refresh rate		60 Hz	60 Hz	60 Hz	60 Hz
Horizontal view angle		80/80 min. 85/85 typ. +/- degrees	80/80 min. 85/85 typ. +/- degrees	80/80 min. 85/85 typ. +/- degrees	80/80 min. 85/85 typ. +/- degrees
Vertical view angle		80/80 min. 85/85 typ. +/- degrees	80/80 min. 85/85 typ. +/- degrees	80/80 min. 85/85 typ. +/- degrees	80/80 min. 85/85 typ. +/- degrees
Pixel pitch		0.153 x 0.153 mm	0.153 x 0.153 mm	0.153 x 0.153 mm	0.153 x 0.153 mm

Id., pp. 22-23 (distinguishing between the display specifications, the final column corresponding to a "2-in-1" configuration).

Table 22. Sensor

Sensor support
Ambient Light Sensor on the hinge-up (optional)
P-sensor on the hinge-up (optional)
1 Accelerometer in the base (system board) for both Clamshell and 2-in-1
1 Accelerometer (Accelerometer + Gyro) in the hinge-up sensor board (Upsell on clamshell with Proximity/ALS/IR camera and 100% attached on 2-in-1)

Id., p. 23 (distinguishing between the sensor configuration and number of accelerometers in the "Clamshell" and "2-in-1" configuration).

37. As another example, the Setup and Specifications document for the Inspiron 7391 2-in-1 describes the Accused Product's four display modes (i.e., notebook, tablet, stand, and tent mode).

See, e.g., https://dl.dell.com/topicspdf/inspiron-13-7391-2-in-1-laptop_users-guide_en-us.pdf, pp. 9-10.

38. As another example, the Setup and Specifications document for the XPS 13 7390 2-in-1 describes the Accused Product's four display modes (i.e., notebook, tablet, stand, and tent mode).

See, e.g., https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf, pp. 9-10.

39. Dell's website describes "the differences between a laptop and a 2-in-1" and touts the superior portability, versatility, and battery power of convertible (2-in-1) devices circa 2014:

> **Portability** – A laptop may not exactly be an anchor, but it still requires more muscle to lug around than your typical 2-in-1, which offers both laptop and tablet functionality at a surprisingly low weight (roughly 2.5 pounds). Flip-screen hybrids are also thinner than traditional convertibles, making them that much easier to move around. And let's not even get started on the amount of effort needed to tote both a laptop and a tablet. *Edge: 2-in-1*
>
> **Versatility** – A 2-in-1 with a flip-screen design offers four-way flexibility: tablet mode, laptop mode, stand mode (perfect for watching TV or a movie) and tent mode (a V-shaped easel stable enough for full touch-screen interaction). Designed

> to be handled, a 2-in-1's soft-touch exterior also makes it more durable. Simply put, a laptop and its traditional clamshell design cannot compete. *Edge: 2-in-1*
>
> **Power** – The longest-lasting laptops can reach the 12-hour mark, with the average clocking at eight to nine hours per charge. But the best flip-screen 2-in-1's are getting more and more powerful, with the newest on the market offering roughly 9.5 hours per charge. *Edge: 2-in-1*

https://www.dell.com/en-us/blog/laptop-vs-2-in-1-which-is-better/.

40. Dell makes, uses, sells, offers for sale and imports the Latitude 5330 2-in-1, which is described on Dell's website:

- https://www.dell.com/en-us/shop/dell-laptops/latitude-5330-laptop-or-2-in-1/spd/latitude-13-5330-laptop ("Latitude 5330 2-in-1 Webpage")
- https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf ("Latitude 5330 2-in-1 Specifications")
- https://dl.dell.com/content/manual27461876-latitude-5330-latitude-5330-2in1-service-manual.pdf ("Latitude 5330 2-in-1 Service Manual")
- https://www.dell.com/support/kbdoc/en-us/000132403/how-to-enable-or-disable-tablet-mode-on-your-notebook-in-windows-10 ("Dell 2-in-1 Tablet Mode Support")

41. Dell's website discusses the benefits of convertible notebook configurations and describes at least four operating modes: Laptop mode, Tent mode, Stand mode, and Tablet mode. According to Dell, the convertible laptop configurations present "key advantages over standard laptops" allowing users to "easily switch from typing up an email in laptop mode, to reading an e-book in tablet mode, to video chatting in tent mode," and to "adjust between tent or stand mode to watch movies, video chat, or consume content in general." *See* https://www.dell.com/en-us/lp/best-2-in-1-laptops.

42. On information and belief, the Accused Products identified in the table below are convertible laptops, which are capable of operating in four operating modes (i.e., notebook, tablet, stand, and tent mode):

Latitude 3120 2-in-1	https://dl.dell.com/content/manual33593571-latitude-3120-latitude-3120-2-in-1-setup-and-specifications.pdf
Latitude 3189 2-in-1	https://dl.dell.com/topicspdf/latitude-11-3189-2-in-1-laptop_owners-manual_en-us.pdf
Latitude 3190 2-in-1	https://dl.dell.com/topicspdf/latitude-11-3190-2-in-1-laptop_owners-manual_en-us.pdf
Latitude 3310 2-in-1	https://dl.dell.com/topicspdf/latitude-13-3310-2-in-1-laptop_owners-manual_en-us.pdf
Latitude 3330 2-in-1	https://dl.dell.com/content/manual53282019-latitude-3330-latitude-3330-2-in-1-setup-and-specifications.pdf
Latitude 3379 2-in-1	https://dl.dell.com/topicspdf/latitude-13-3379-2-in-1-laptop_owners-manual_en-us.pdf
Latitude 3390 2-in-1	https://dl.dell.com/topicspdf/latitude-13-3390-2-in-1-laptop_owners-manual5_en-us.pdf
Latitude 5289 2-in-1	https://dl.dell.com/content/manual34591402-latitude-5289-2-in-1-owner-s-manual.pdf?language=en-us&ps=true
Latitude 5300 2-in-1	https://dl.dell.com/topicspdf/latitude-13-5300-2-in-1-laptop_owners-manual_en-us.pdf
Latitude 5310 2-in-1	https://dl.dell.com/topicspdf/latitude-13-5310-2-in-1-laptop_owners-manual_en-us.pdf
Latitude 5320 2-in-1	https://dl.dell.com/content/manual40442222-latitude-5320-latitude-5320-2in1-setup-and-specifications-guide.pdf
Latitude 5330 2-in-1	https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf
Latitude 7310 2-in-1	https://dl.dell.com/topicspdf/latitude-13-7310-2-in-1-laptop_owners-manual2_en-us.pdf
Latitude 7330 2-in-1	https://dl.dell.com/content/manual34811490-latitude-7330-latitude-7330-2-in-1-setup-and-specifications.pdf
Latitude 7389 2-in-1	https://dl.dell.com/topicspdf/latitude-13-7389-2-in-1-laptop_owners-manual_en-us.pdf
Latitude 7390 2-in-1	https://dl.dell.com/topicspdf/latitude-13-7390-2-in-1-laptop_owners-manual3_en-us.pdf

Latitude 7400 2-in-1	https://dl.dell.com/topicspdf/latitude-14-7400-2-in-1-laptop_owners-manual2_en-us.pdf
Latitude 7410 2-in-1	https://dl.dell.com/topicspdf/latitude-14-7410-2-in-1-laptop_owners-manual2_en-us.pdf
Latitude 7420 2-in-1	https://dl.dell.com/content/manual43859724-latitude-7420-latitude-7420-2-in-1-setup-and-specifications.pdf
Latitude 7430 2-in-1	https://dl.dell.com/content/manual46425537-latitude-7430-latitude-7430-2-in-1-setup-and-specifications.pdf
Latitude 9330 2-in-1	https://dl.dell.com/content/manual39084778-latitude-9330-setup-and-specifications.pdf
Latitude 9410 2-in-1	https://dl.dell.com/topicspdf/latitude-14-9410-2-in-1-laptop_owners-manual_en-us.pdf
Latitude 9420 2-in-1	https://dl.dell.com/content/manual20845082-latitude-9420-latitude-9420-2-in-1-setup-and-specifications.pdf
Latitude 9430 2-in-1	https://dl.dell.com/content/manual48581782-latitude-9430-latitude-9430-2-in-1-setup-and-specifications.pdf
Latitude 9510 2-in-1	https://dl.dell.com/topicspdf/latitude-15-9510-2-in-1-laptop_owners-manual5_en-us.pdf
Latitude 9520 2-in-1	https://dl.dell.com/content/manual23879139-latitude-9520-latitude-9520-2-in-1-setup-and-specifications.pdf
Inspiron 3153 2-in-1	https://downloads.dell.com/manuals/all-products/esuprt_laptop/esuprt_inspiron_laptop/inspiron-11-3153
Inspiron 3158 2-in-1	https://dl.dell.com/manuals/all-products/esuprt_laptop/esuprt_inspiron_laptop/inspiron-11-3158
Inspiron 3168 2-in-1	https://dl.dell.com/manuals/all-products/esuprt_laptop/esuprt_laptop_inspiron/esuprt_laptop_inspiron_3000/
Inspiron 3169 2-in-1	https://dl.dell.com/manuals/all-products/esuprt_laptop/esuprt_laptop_inspiron/esuprt_laptop_inspiron_3000/
Inspiron 3179 2-in-1	https://dl.dell.com/topicspdf/inspiron-11-3179-2-in-1-laptop_specifications_en-us.pdf
Inspiron 3185 2-in-1	https://dl.dell.com/topicspdf/inspiron-11-3185-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 3195 2-in-1	https://dl.dell.com/topicspdf/inspiron-11-3195-2-in-1-laptop_setup-guide_en-us.pdf

Inspiron 5368 2-in-1	https://dl.dell.com/manuals/all-products/esuprt_laptop/esuprt_inspiron_laptop/
Inspiron 5378 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-5378-2-in-1-laptop_service-manual_en-us.pdf
Inspiron 5379 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-5379-2-in-1-laptop_specifications_en-us.pdf
Inspiron 5400 2-in-1	https://dl.dell.com/topicspdf/inspiron-14-5400-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 5406 2-in-1	https://dl.dell.com/topicspdf/inspiron-14-5406-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 5410 2-in-1	https://dl.dell.com/topicspdf/inspiron-14-5410-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 5481 2-in-1	https://dl.dell.com/topicspdf/inspiron-14-5481-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 5482 2-in-1	https://dl.dell.com/topicspdf/inspiron-14-5482-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 5485 2-in-1	https://dl.dell.com/topicspdf/inspiron-14-5485-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 5491 2-in-1	https://dl.dell.com/topicspdf/inspiron-14-5491-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 5568 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-5568-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 5578 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-5578-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 5579 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-5579-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 5582 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-5582-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 5591 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-5591-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7300 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7300-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7306 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7306-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7353 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7353-laptop_service-manual_en-us.pdf

Inspiron 7359 2-in-1	https://dl.dell.com/manuals/all-products/esuprt_laptop/esuprt_inspiron_laptop/
Inspiron 7368 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7368-2-in-1-laptop_service-manual_en-us.pdf
Inspiron 7373 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7373-2-in-1-laptop_specifications_en-us.pdf
Inspiron 7375 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7375-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 7378 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7378-2-in-1-laptop_service-manual_en-us.pdf
Inspiron 7386 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7386-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7390 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7390-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 7391 2-in-1	https://dl.dell.com/topicspdf/inspiron-13-7391-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7405 2-in-1	https://dl.dell.com/topicspdf/inspiron-14-7405-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7415 2-in-1	https://dl.dell.com/topicspdf/inspiron-14-7415-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 7500 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-7500-2-in-1-silver-laptop_users-guide_en-us.pdf
Inspiron 7506 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-7506-2-in-1-laptop_users-guide2_en-us.pdf
Inspiron 7568 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-7568-laptop_service-manual_en-us.pdf
Inspiron 7569 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-7569-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 7573 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-7573-2-in-1-laptop_specifications_en-us.pdf
Inspiron 7579 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-7579-2-in-1-laptop_setup-guide_en-us.pdf
Inspiron 7586 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-7586-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7590 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-7590-2-in-1-laptop_setup-guide_en-us.pdf

Inspiron 7591 2-in-1	https://dl.dell.com/topicspdf/inspiron-15-7591-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7706 2-in-1	https://dl.dell.com/topicspdf/latitude-11-3189-2-in-1-laptop_owners-manual_en-us.pdf
Inspiron 7773 2-in-1	https://dl.dell.com/topicspdf/inspiron-17-7773-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7778 2-in-1	https://dl.dell.com/topicspdf/inspiron-17-7778-2-in-1-laptop_service-manual_en-us.pdf
Inspiron 7779 2-in-1	https://dl.dell.com/topicspdf/inspiron-17-7779-2-in-1-laptop_service-manual_en-us.pdf
Inspiron 7786 2-in-1	https://dl.dell.com/topicspdf/inspiron-17-7786-2-in-1-laptop_users-guide_en-us.pdf
Inspiron 7791 2-in-1	https://dl.dell.com/topicspdf/inspiron-17-7791-2-in-1-laptop_users-guide_en-us.pdf
XPS 13 7390 2-in-1	https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf
XPS 13 9310 2-in-1	https://dl.dell.com/content/manual40030076-xps-13-2-in-1-9310-2n1-setup-and-specifications.pdf
XPS 13 9365 2-in-1	https://www.dell.com/support/home/en-us/product-support/product/xps-13-9365-2-in-1-laptop/drivers
XPS 15 9575 2-in-1	https://dl.dell.com/topicspdf/xps-15-9575-2-in-1-laptop_specifications_en-us.pdf

43. As detailed below, each element of at least one claim of each of the Asserted Patents is literally present in the Accused Products, or is literally practiced by Dell personnel, agents or customers who use the Accused Products. To the extent that any element is not literally present or practiced, each such element is present or practiced under the doctrine of equivalents.

44. Dell has made extensive use of LiTL's patented technologies, including the technology described and claimed in the Asserted Patents. LiTL is committed to defending its proprietary and patented technology. LiTL requests that this Court award it damages sufficient to compensate for Dell's infringement of the Asserted Patents, find this case exceptional and

award LiTL its attorneys' fees and costs, and grant an injunction against Dell to prevent ongoing infringement of the Asserted Patents.

COUNT I

(Infringement of U.S. Patent No. 8,289,688)

45. LiTL incorporates by reference and realleges all the foregoing paragraphs of the Complaint as if fully set forth herein.

Dell's Direct Infringement

46. Dell has directly infringed and continues to directly infringe, literally and/or equivalently, one or more claims of the '688 patent, including at least claim 19, including by importing, using, selling, and offering for sale in the United States the Accused Products.

47. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) are portable computers that include a base unit comprising an integrated keyboard and a single display unit including a single display screen configured to display content. For example:

48. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an orientation sensor which detects a physical orientation of the single display unit relative to the base unit and a display orientation module which orients the content displayed on the single display screen

responsive to the physical orientation detected by the orientation sensor between at least a first content display orientation and a second content display orientation, the second content display orientation being 180 degrees relative to the first content display orientation. For example:

Table 22. Sensor

Sensor support
Ambient Light Sensor on the hinge-up (optional)
P-sensor on the hinge-up (optional)
1 Accelerometer in the base (system board) for both Clamshell and 2-in-1
1 Accelerometer (Accelerometer + Gyro) in the hinge-up sensor board (Upsell on clamshell with Proximity/ALS/IR camera and 100% attached on 2-in-1)

See, e.g., Latitude 5330 2-in-1 Specifications, p. 23.

First content display orientation in laptop mode

Second content display orientation in easel mode

49. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display orientation module that is configured to detect a change between a laptop mode, an easel mode, and a frame mode based on the detected physical orientation of the single display unit relative to the base unit. For example:

Laptop mode

Easel mode

Frame mode

50. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display orientation module further configured to trigger a display inversion from one of the first and second content display orientations to the other of the first and second content display orientations responsive to the orientation sensor detecting the change between the laptop mode and the easel mode. For example:

First content display orientation in laptop mode

Second content display orientation in easel mode

51. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display orientation module further configured to trigger a display inversion from one of the first and second content display orientations to the other of the first and second content display

orientations responsive to the orientation sensor detecting the change between the easel mode and the frame mode. For example:

Easel mode

Frame mode

Dell's Knowledge of the Patents Owned by Its Subsidiary Dell Products L.P.

52. In each of Dell's 10-K statements from 2017 through 2022, Dell has reported the number issued patents and patent applications that it owns.

53. On information and belief, the vast majority of Dell's patents and patent applications are assigned to Dell Products, L.P. ("Dell Products").

54. Dell Products is a wholly-owned subsidiary of Dell Inc. *See REC Software USA, Inc. v. Dell Inc. et al*, No. 2:14-cv-01048, D.I. 20 (Aug. 19, 2014 W.D. Wash.); *Trustees of Boston University v. Dell Inc. et al*, No. 1:13-cv-12330, D.I. 15 (Nov. 4, 2013 D. Mass.).

55. Dell Products and Dell Inc. have had overlapping officers. For example, in a Second Amended and Restated Certificate of Formation for Dell Products dated January 27, 2020, Richard Rothberg was identified as General Counsel for Dell Products and Robert Potts was identified as Senior Vice President and Assistant Secretary. Mr. Rothberg's LinkedIn profile identifies him as General Counsel of Dell Inc. https://www.linkedin.com/in/richard-rothberg-99623645/ A Dell Inc. submission to the SEC dated May 31, 2019 identifies Robert Potts as Senior Vice President and Assistant Secretary at that time. https://www.sec.gov/Archives/edgar/data/1468666/000146866619000054/exhibit101q1fy200-0605.htm

56. On information and belief, Dell Inc. patent attorneys have been involved in prosecuting patent applications owned by Dell Products.

57. On information and belief, Chad Anson is a patent attorney who worked for Dell. Mr. Anson's LinkedIn profile states that he was "Legal Director, Intellectual Property / Patents" at "Dell Inc." where "he led a team that engages with all of Dell's development and technologist teams around the world to protect the inventions that matter most to Dell and its customers" and also "provided IP-related guidance across all of Dell's business units, and supported Dell's patent litigation activity." https://www.linkedin.com/in/chad-anson-2161452/

58. Mr. Anson has been identified as "Legal Director, Intellectual Property / Patents" for both Dell Inc. and Dell Products on patent applications owned by Dell Products.

59. For example, U.S. Patent Application No. 13/747,696 ("the '696 Application") is owned by Dell Products. Mr. Anson signed a Power of Attorney ("POA") dated September 24, 2012 that Dell Products filed with the '696 Application on January 23, 2013. In the "Title and Company" line in the POA signature block, Mr. Anson is identified as "Legal Director, Intellectual Property / Patents DELL INC."

60. As another example, U.S. Patent Application No. 13/839,873 ("the '873 Application") is owned by Dell Products. Mr. Anson signed a POA dated January 31, 2013 that Dell Products filed with the '873 Application on October 20, 2015. In the "Title and Company" line in the POA signature block, Mr. Anson is identified as "Legal Director, Intellectual Property / Patents Dell Products L.P."

61. Mr. Anson also signed POAs in U.S. Patent Application Nos. 15/226,023 and 15/872,969, both of which are owned by Dell Products. As detailed below, all four of the patent applications containing a POA signed by Mr. Anson cite to at least one of the LiTL patents (or their published applications) that LiTL asserts against Dell in this action.

62. On information and belief, Anthony Peterman is a patent attorney who works for Dell.

63. According to the State Bar of Texas website, Mr. Peterman is part of "Dell Inc. Legal Department." https://www.texasbar.com/AM/Template.cfm?Section=Find_A_Lawyer&template=/Customsource/MemberDirectory/MemberDirectoryDetail.cfm&ContactID=151600

64. According to Mr. Peterman's LinkedIn profile, he is currently "Vice President, IP & IP Litigation at Dell Technologies." https://www.linkedin.com/in/anthony-peterman-59b202.

65. Mr. Peterman signed a POA dated May 24, 2019 in U.S. Patent Application No. 16/422,842, which is owned by Dell Products. In the "Title" line in the POA signature block, Mr. Peterman is identified as "Director – Intellectual Property, Patents – Dell Products, LP."

66. Mr. Peterman also signed POAs in U.S. Patent Application Nos. 16/744,658 and 17/081,266, both of which are owned by Dell Products. As detailed below, all three of the patent applications containing a POA signed by Mr. Peterman cite to at least one of the LiTL patents (or their published applications) that LiTL asserts against Dell in this action.

67. Each of Dell's 10-K statements from 2017 through 2022 states: "The inventions claimed in our patents and patent applications cover aspects of our current and possible future computer system and software products, manufacturing processes, and related technologies."

68. On information and belief, Dell Products permits Dell Inc. to practice the subject matter claimed in the patents and patent applications owned by Dell Products.

69. On information and belief, Dell Inc. has prosecuted and is prosecuting patents and patent applications owned by Dell Products, including because: (1) Mr. Anson has been identified as an attorney for both Dell Inc. and Dell Products, and has been involved in prosecution of Dell's patent applications, including Dell patent applications that cite to LiTL's asserted patents or their published applications; (2) Mr. Peterman has been identified as an attorney for Dell Inc., Dell Technologies, and Dell Products, and has been involved in prosecution of Dell's patent applications, including Dell patent applications that cite to LiTL's asserted patents or their published applications; and (3) on information and belief, Dell Products has authorized Dell Inc. to practice its patents, including its patents directed to convertible devices such as the Accused Products.

Dell's Knowledge of the '688 Patent

70. On information and belief, Dell has known of the '688 patent since at least 2013.

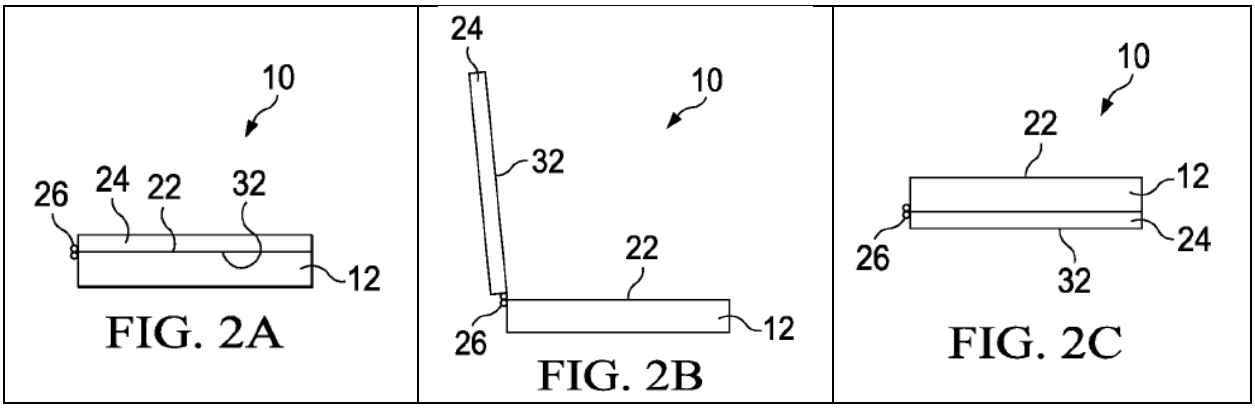
71. The ’688 patent and its published application were cited during prosecution of at least five U.S. patent applications owned by Dell Products that relate to Dell’s convertible devices.

The Dell ’873 Application

72. For example, on March 15, 2013, Dell Products filed U.S. Patent Application No. 13/839,873 (“the Dell ’873 Application”), entitled “Information Handling System Housing Lid With Synchronized Motion.”

73. The Dell ’873 Application is directed to a convertible laptop that “converts from a closed position to a table position by rotating a lid with a display 360 degrees about a hinge having synchronized and continuous motion.” Dell ’873 Application, Abstract.

74. The Dell ’873 Application depicts a convertible laptop in Figure 2A (closed configuration), Figure 2B (clamshell configuration), and Figure 2C (tablet configuration).



75. On March 27, 2013, Dell Products submitted an Information Disclosure Statement (“IDS”) that identifies four U.S. patents, the first of which is the ’688 patent.

76. On October 20, 2015, Dell Products filed a POA dated January 31, 2013 signed by Dell Inc.’s patent attorney, Mr. Anson.

77. On December 1, 2015, the Dell ’873 Application issued as U.S. Patent No. 9,201,465 (“the Dell ’465 patent”), which identifies the ’688 patent under the “References Cited” section.

The Dell ’023 Application

78. As another example, on August 2, 2016, Dell Products filed U.S. Patent Application No. 15/226,023 (“the Dell ’023 Application”), entitled “Antenna Solution For Narrow Bezel System.”

79. On August 2, 2016, Dell Products filed a POA signed by Dell Inc.’s patent attorney, Mr. Anson.

80. The Dell ’023 Application is directed to a convertible laptop that can be configured into closed, clamshell, tablet, stand and tent configurations by rotating a lid from 0 to 360 degrees. Dell ’023 Application, Specification [0038].

81. On October 5, 2017, the examiner rejected the pending claims as obvious and in the Notice of References Cited listed the ’688 patent along with five other prior art references.

Notice of References Cited	Application/Control No. 15/226,023	Applicant(s)/Patent Under Reexamination BOLOGNA ET AL.	
	Examiner HUEDUNG MANCUSO	Art Unit 2845	Page 1 of 1

U.S. PATENT DOCUMENTS

*		Document Number Country Code-Number-Kind Code	Date MM-YYYY	Name	CPC Classification	US Classification
*	A	US-6,829,140 B2	12-2004	Shimano; Kenji	G06F1/162	248/919
*	B	US-8,312,991 B2	11-2012	Diebel; Markus	A45C11/00	206/305
*	C	US-8,289,688 B2	10-2012	Behar; Yves	G06F1/162	361/679.27
*	D	US-2011/0260919 A1	10-2011	Montag; Bruce C.	H01Q3/24	342/374
*	E	US-8,896,487 B2	11-2014	Chiang; Bing	G06F1/1616	343/700MS
*	F	US-3,611,063 A	10-1971	Neale; Ronald George	H01L45/04	257/4
	G	US-				

82. On April 3, 2018, the Dell ’023 Application issued as U.S. Patent No. 9,935,357 (“the Dell ’357 patent”), which identifies the ’688 patent under the “References Cited” section.

The Dell ’969 Application

83. As another example, on January 16, 2018, Dell Products filed U.S. Patent Application No. 15/872,969 (“the Dell ’969 Application”), entitled “Method And Apparatus For An Accelerometer Assisted Control System For A Reconfigurable Antenna Communication Device.”

84. On January 16, 2018, Dell Products filed a POA signed by Dell Inc.’s patent attorney, Mr. Anson.

85. The Dell ’969 Application is directed to a convertible laptop that can be configured into at least four positions by rotating the display about the base, as depicted in Figure 3.

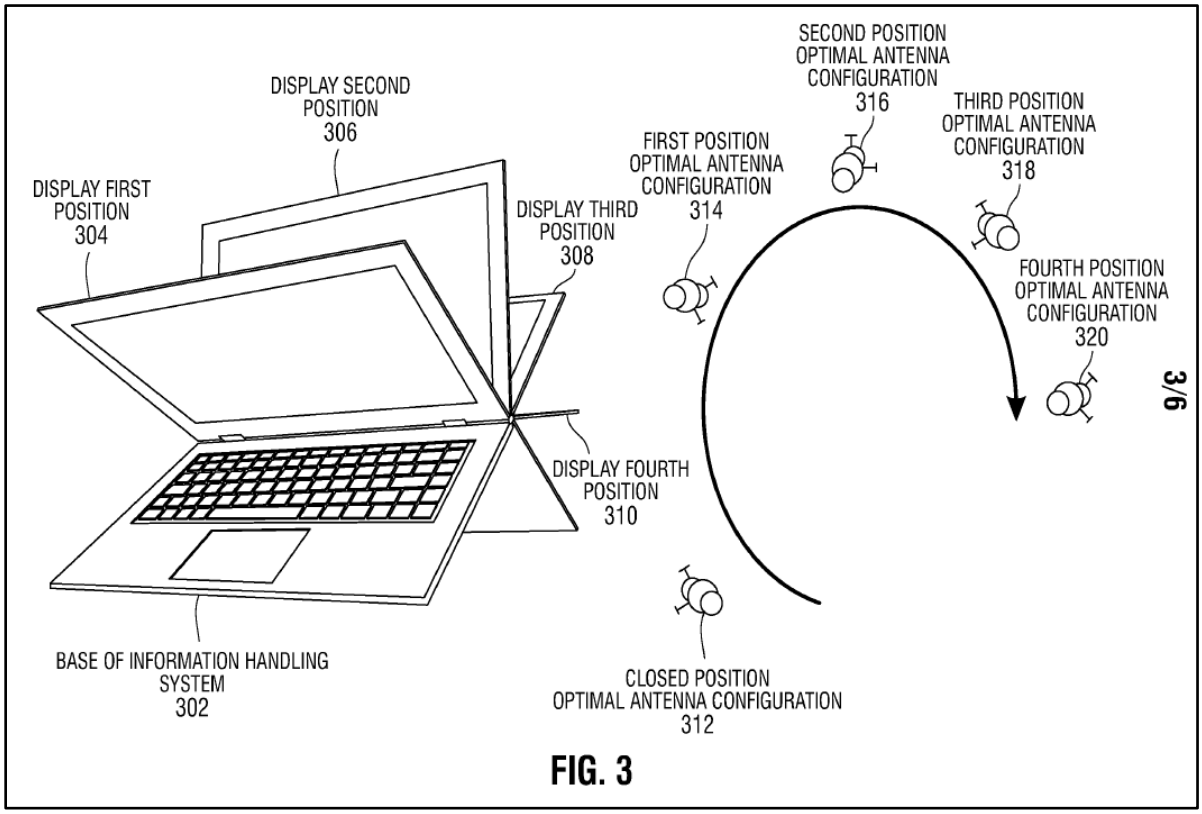


FIG. 3

86. On January 15, 2019, Dell Products submitted an IDS that identifies four U.S. patent documents, one of which is the ’688 patent.

87. On June 11, 2019, the Dell ’969 Application issued as U.S. Patent No. 10,321,463 (“the Dell ’463 patent”), which identifies the ’688 patent under the “References Cited” section.

The Dell ’842 Application

88. As another example, on May 24, 2019, Dell Products filed U.S. Patent Application No. 16/422,842 (“the Dell ’842 Application”), entitled “Method And Apparatus For An Accelerometer Assisted Control System For A Reconfigurable Antenna Communication Device.” The Dell ’842 Application is a continuation of the Dell ’969 Application, which is directed to a convertible laptop that can be configured into at least four positions by rotating the display about the base.

89. On May 24, 2019, Dell Products filed a POA signed by Dell Inc.’s patent attorney, Mr. Peterman.

90. Dell Products submitted as part of the initial application an IDS that identifies the ’688 patent.

91. After filing a terminal disclaimer to overcome an obviousness-type double-patenting over the earlier-issued Dell ’463 patent, the Dell ’842 Application issued as U.S. Patent No. 10,736,118 (“the Dell ’118 patent”) on August 4, 2020, which identifies the ’688 patent under the “References Cited” section.

The Dell ’707 Application

92. As another example, on September 30, 2016, Dell Products filed U.S. Patent Application No. 15/282,707 (“the Dell ’707 Application”), entitled “Systems And Methods For Mechanically Interfacing Camera To Hinge Of Information Handling System.”

93. The Dell ’707 Application includes embodiments involving a convertible laptop that can be configured into clamshell or tablet configuration by rotating a lid from 0 to 360 degrees. Dell ’707 Application, Specification, p. 15.

94. On July 31, 2017, the examiner rejected the pending claims as obvious and in the Notice of References Cited listed U.S. Pub. No. 2009/0244832 (“the ’832 Publication”), which is the published application that matured into the ’688 patent.

95. On July 3, 2018, the Dell ’707 Application issued as U.S. Patent No. 10,013,031 (“the Dell ’031 patent”), which identifies the ’832 Publication under the “References Cited” section.

96. On information and belief, Dell Inc. and Dell Technologies Inc. became aware that the ’832 Publication matured into the ’688 patent before the filing of this Complaint given Dell’s substantial intellectual property department, Dell’s procedures for performing freedom-to-operate analyses, and the fact that Dell subsequently cited the ’688 patent in IDSs during prosecution of the Dell ’969 and ’842 Applications.

97. On information and belief, Dell Inc. and Dell Technologies Inc. have known of the ’688 patent since at least 2013 at least because: (1) Mr. Anson has been identified as an attorney for both Dell Inc. and Dell Products; (2) Mr. Peterman has been identified as an attorney for Dell Inc., Dell Technologies, and Dell Products; (3) during prosecution of the Dell ’873 Application, Dell Products identified the ’688 patent in an IDS filed in 2013, and Dell Inc.’s patent attorney, Mr. Anson, was involved in prosecution of the Dell ’873 Application; (4) during prosecution of the Dell ’023 Application, the ’688 patent was cited in an Office Action in 2017, and Dell Inc.’s patent attorney, Mr. Anson, was involved in prosecution of the Dell ’023 Application; (5) during prosecution of the Dell ’969 Application, Dell Products cited the ’688

patent in an IDS in 2019, and Dell Inc.'s patent attorney, Mr. Anson, was involved in prosecution of the Dell '969 Application; (6) during prosecution of the Dell '842 Application, Dell Products cited the '688 patent in an IDS in 2019, and Dell Inc.'s patent attorney, Mr. Peterman, was involved in prosecution of the Dell '842 Application; (7) during prosecution of the Dell '707 Application, the published application that matured into the '688 patent was cited in an Office Action in 2017; (8) Dell Products is a wholly-owned subsidiary of Dell Inc. and the two entities have shared overlapping officers; (9) on information and belief (including Dell's 10-K statements), the subject matter disclosed in Dell's patents and patent applications relate to aspects of the Accused Products made and sold by Dell Inc.; and (10) on information and belief, Dell Products has authorized Dell Inc. to practice its patents, including its patents relating to 2-in-1 devices such as the Accused Products, which cite the '688 patent and its published application.

Dell's Induced Infringement

98. On information and belief, Dell Inc. and Dell Technologies Inc. has known that the Accused Products infringe the '688 patent since at least 2017, by which time the Accused Products were being offered for sale, sold, imported, and used in the United States. *See, e.g.*, https://www.dell.com/en-us/blog/7-dell-products-named-2017-ces-innovation-award-honorees/.

99. Since at least 2017, Dell Inc. and Dell Technologies Inc. knew that the Accused Products infringe at least claim 19 of the '688 patent when used by customers or other users, when imported by others, and when sold or offered for sale by Dell Inc. and resellers such as Best Buy.

100. Since at least 2017, Dell Technologies Inc. has induced infringement and continues to induce infringement by actively encouraging Dell Inc. to directly infringe at least

claim 19 of the ’688 patent by facilitating Dell Inc.’s sales, offers for sale, and use of the Accused Products.

101. Since at least 2017, Dell Inc. has induced infringement and continues to induce infringement by actively encouraging resellers to directly infringe at least claim 19 of the ’688 patent by facilitating resellers’ sales and offers for sale of the Accused Products and by having the Accused Products manufactured and imported. On information and belief, Dell resellers include Best Buy. https://www.dell.com/en-us/lp/reseller_store_locator

102. Since at least 2017, Dell Inc. has induced infringement and continues to induce infringement by actively encouraging customers or other users to directly infringe at least claim 19 of the ’688 patent. Dell Inc. has provided with the Accused Products and on Dell’s website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 19 of the ’688 patent. For example, Dell’s website touts the availability of four display modes on its Latitude, Inspiron, and XPS 2-in-1 notebooks. *E.g.*, https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf (pp. 10-12); https://dl.dell.com/topicspdf/inspiron-13-7391-2-in-1-laptop_users-guide_en-us.pdf (pp. 9-10); and https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf (pp. 9-10).

Dell’s Willful Infringement

103. Dell has willfully infringed at least claim 19 of the ’688. Dell’s offers for sale, sales, and uses of the Accused Products with provision of manuals and instruction to purchasers that encourage use it knows will infringe the ’688 patent demonstrate the willful nature of Dell’s infringement.

104. According to job descriptions for positions for Dell intellectual property legal counsel, such attorneys provide "freedom-to-operate analysis." https://dell.talentify.io/job/legal-counsel-intellectual-property-ip-round-rock-texas-dell-r175339; https://www.legal.io/jobs/5197926/Intellectual-Property-IP-Attorney

105. In a statement that a Dell intellectual property attorney submitted to the USPTO on May 6, 2015, Dell stated that "Dell is a frequent customer of the USPTO." According to Dell's 2022 10-K statement, as of 2022, Dell "held a worldwide portfolio of 18,570 granted patents and 7,619 pending patent applications." https://investors.delltechnologies.com/static-files/e8323060-4838-4901-b341-e6798bd367fb, p. 11. According to a 2021 study, Dell obtained over 2,000 patents from the USPTO in 2021, placing it 16th on a list of organizations that receive the most U.S. utility patents. https://ipo.org/wp-content/uploads/2022/01/2021-Patent-300%C2%AE-IPO-Top-Patent-Owners-List-FINAL.pdf On information and belief, Dell's intellectual property department has a substantial head count and resources, which would be necessary to support Dell's substantial patent prosecution activities before the USPTO.

106. Given job descriptions for Dell's attorneys involving procedures for performing freedom-to-operate analyses, given Dell's substantial intellectual property department, and given Dell's knowledge of the '688 patent since at least 2013, if Dell did not investigate whether the Accused Products infringe the '688 patent, then Dell was willfully blind to a reasonable likelihood that the Accused Products infringe the '688 patent.

107. The foregoing description of Dell's infringement is based on publicly available information. LiTL reserves the right to modify this description, including, for example, on the basis of information about the Accused Products that it obtains during discovery.

108. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Dell's infringement of the '688 patent.

109. Dell's infringement of the '688 patent has damaged and continues to damage LiTL in an amount yet to be determined, of no less than a reasonable royalty.

COUNT II

(Infringement of U.S. Patent No. 8,624,844)

110. LiTL incorporates by reference and realleges all the foregoing paragraphs of this Complaint as if fully set forth herein.

Dell's Direct Infringement

111. Dell has directly infringed and continues to directly infringe, literally and/or equivalently, one or more claims of the '844 patent, including at least claims 10 and 17, including by importing, using, selling, and offering for sale in the United States the Accused Products.

112. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) are portable computers that are configurable between a plurality of display modes including a laptop mode and an easel mode wherein transitions between the plurality of display modes permit an operator to interact with a single display screen in each of the plurality of display modes. For example:

Laptop mode

Easel mode

113. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) are portable computers that include a base including a keyboard, a main display component rotatably coupled to the base and including the single display screen which displays content. For example:

114. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a hinge assembly disposed at least partially within the base. For example:

See, e.g., Latitude 5330 2-in-1 Webpage.

115. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a main display component that defines an axis of rotation about which both the base and the main display component are rotatable to transition the portable computer between at least the laptop mode and the easel mode, wherein the transition between the laptop mode and the easel mode allows the operator to operate the portable computer while viewing the single display screen in each of the plurality of display modes. For example:

Laptop mode

Easel mode

116. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a laptop mode that is configured to display to a user on the main display component a first content mode having a

first content display orientation with the main display component oriented towards the user and the keyboard oriented to receive input from the user. For example:

Laptop mode configured to display a first content mode

117. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an easel mode that is configured to display to the user on the main display component a second content mode having a second content display orientation with the main display component oriented towards the user and the keyboard oriented away from the user. For example:

Easel mode configured to display a second content mode

118. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include first and second content display orientations that are 180 degrees relative to each other. For example:

Laptop mode displaying first content display orientation

Easel mode displaying second content display orientation

119. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include portable computers that are operable in the easel mode to enable the user to interact with displayed content without interacting with the keyboard. For example:

Easel mode

120. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a navigation control accessible in each of the plurality of display modes and configured to permit a user to manipulate at least one of operating parameters of the portable computer and the content displayed on the single display screen. For example, the Latitude 5330 2-in-1 includes a touchscreen that is accessible in any mode.

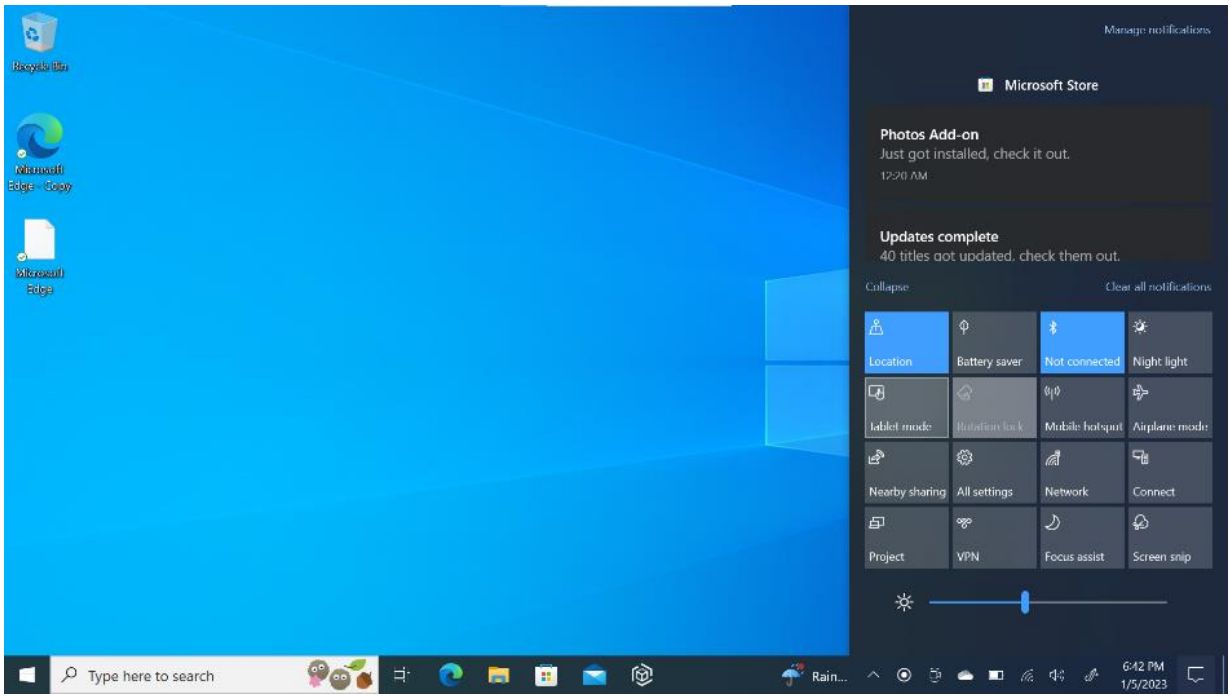
> **Display**
> 2-in-1, 13.3" FHD (1920x1080) AG, Touch, WVA, 300 nit, HD Cam, WLAN, Pen support, Gorilla Glass

See, e.g., Latitude 5330 2-in-1 Webpage.

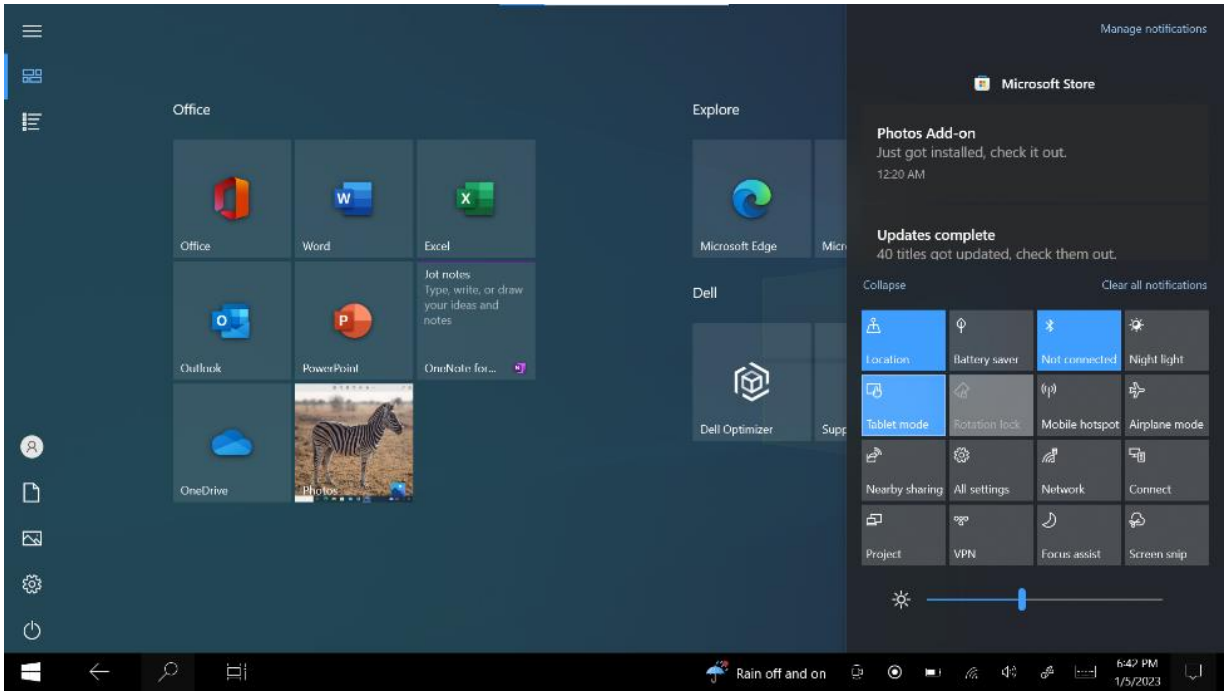
121. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a plurality of modes that includes a frame mode in which the main display component is oriented towards the operator, the base contacts a substantially horizontal surface, and the keyboard faces the substantially horizontal surface.

Frame mode

122. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an operating display mode which is selected from the plurality of display modes in response to operation of the navigation control. For example:



First operating display mode



Second operating display mode

Dell's Knowledge of the '844 Patent

123. On information and belief, Dell knew of the '844 patent before the filing of this Complaint.

124. The published application that matured into the '844 patent was cited during prosecution of two patent applications owned by Dell Products.

<u>The Dell '696 Application</u>

125. For example, on January 23, 2013, Dell Products filed U.S. Patent Application No. 13/747,696 ("the Dell '696 Application"), entitled "Articulating Information Handling System Housing Wireless Network Antennae Supporting Beamforming."

126. On January 23, 2013, Dell Products filed a POA signed by Dell Inc.'s patent attorney, Mr. Anson, which identified Mr. Anson as "Legal Director, Intellectual Property / Patents DELL INC."

127. The Dell ’696 Application is directed to a convertible laptop having antennae that can be used in clamshell or tablet configurations. Dell ’696 Application, Abstract.

128. Figure 2 of the Dell ’696 Application depicts a convertible laptop in multiple configurations.

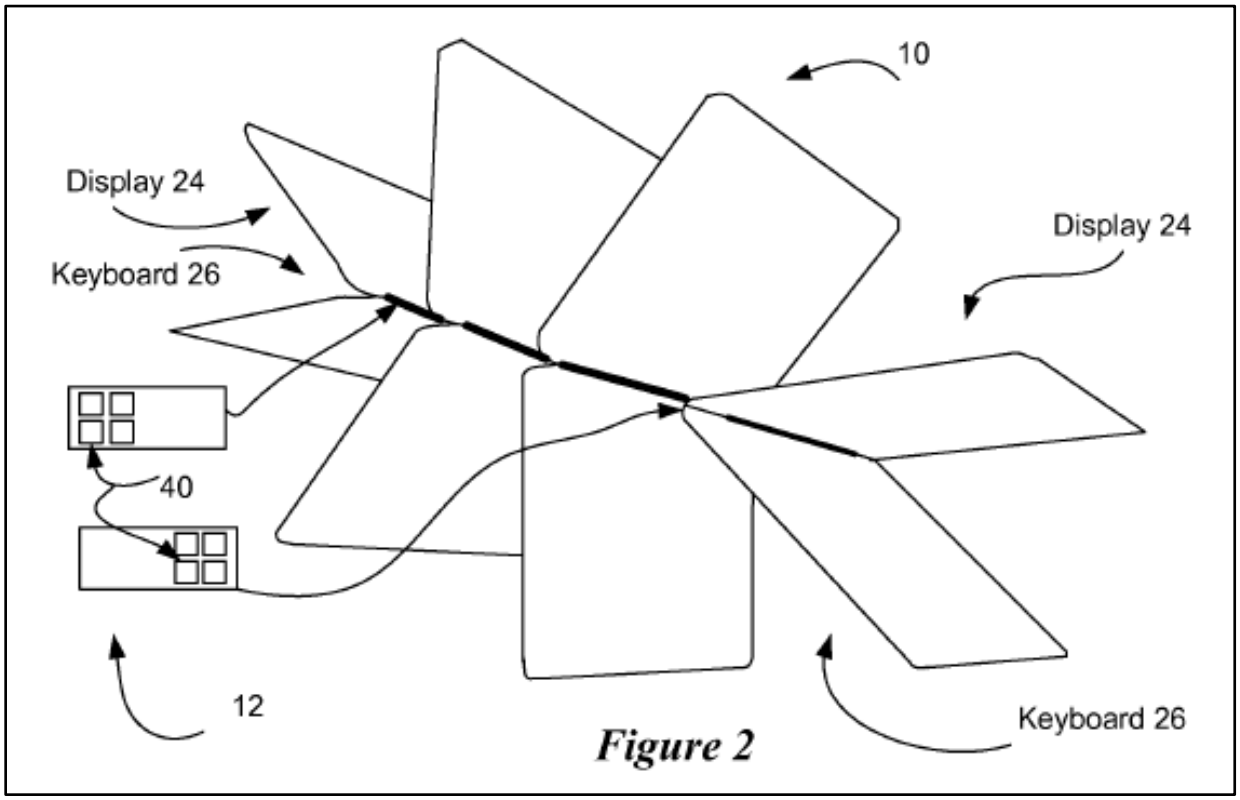


Figure 2

129. In an office action dated October 13, 2017, the examiner rejected pending claim 3 as obvious over several references including U.S. Pub. No. 2009/0244012 (“the ’012 Publication”), which is the published application that matured into the ’844 patent. The examiner stated that “Behar [the ’012 Publication] teaches an accelerometer is a known configuration detector for determining the configuration between a display portion and a main portion of an information handling system (Fig. 4; ¶60, lines 4-10).

130. On July 24, 2018, the Dell ’696 Application issued as U.S. Patent No. 10,033,087 (“the Dell ’087 patent”), which identifies the ’012 Publication under the “References Cited” section.

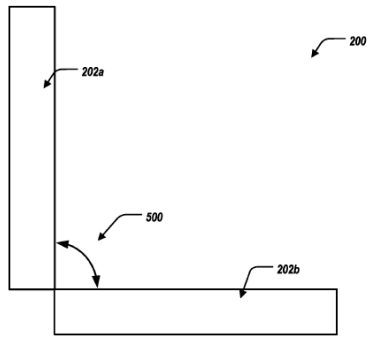
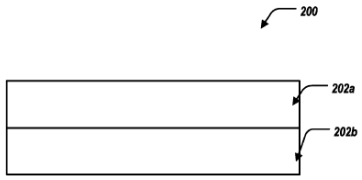
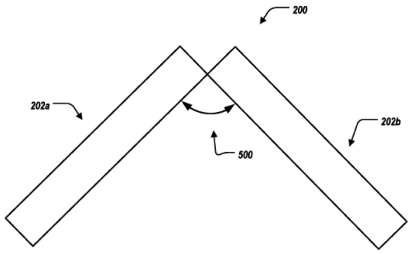
131. On information and belief, Dell Inc. and Dell Technologies Inc. became aware that the ’012 Publication matured into the ’844 patent before the filing of this Complaint given Dell’s substantial intellectual property department and Dell’s procedures for performing freedom-to-operate analyses.

The Dell ’658 Application

132. As another example, on January 16, 2020, Dell Products filed U.S. Patent Application No. 16/744,658 (“the Dell ’658 Application”), entitled “Managing Peripherals Of A Dual-Body Information Handling System.”

133. On January 16, 2020, Dell Products filed a POA signed by Dell Inc.’s patent attorney, Mr. Peterman.

134. The Dell ’658 Application is directed to a convertible laptop (which Dell calls a “dual-body information handling system”) capable of “identifying contextual data associated with contextual inputs … the contextual data including i) a hinge angle … and ii) a posture mode.” Dell ’658 Application, Specification, [0004]. Paragraph [0006] of the specification further states that “identifying contextual data includes identifying the posture mode of the dual-body information handling system from a table-top posture mode, a book posture mode, and a tent posture mode.” Figures 5, 6, and 7 depict the table-top posture mode, book posture mode, and tent posture mode, respectively. Dell ’658 Application, Specification, [0012]-[0014].

 FIG. 5	 FIG. 6	 FIG. 7
Table-top posture mode	Book posture mode	Tent posture mode

135. In an office action dated October 16, 2020, the examiner rejected several pending claims as obvious over several references including the ’012 Publication.

136. In a response dated January 13, 2021, Dell Products cancelled the claims rejected based on the ’012 Publication.

137. On June 8, 2021, the Dell ’658 Application issued as U.S. Patent No. 11,029,771 (“the Dell ’771 patent”), which identifies the ’012 Publication under the “References Cited” section with an asterisk to indicate that it was cited by the examiner.

138. On information and belief, Dell Inc. and Dell Technologies Inc. became aware that the ’012 Publication matured into the ’844 patent before the filing of this Complaint given Dell’s substantial intellectual property department and given job descriptions for Dell’s attorneys involving procedures for performing freedom-to-operate analyses.

139. On information and belief, Dell’s knowledge of the ’688 patent by at least 2013 would have caused Dell to investigate, become aware of, and consider LiTL’s related patents, including the ’844 patent, before the filing of this Complaint.

140. On information and belief, Dell Inc. and Dell Technologies Inc. have known of the ’844 patent since before the filing of this Complaint at least because: (1) Mr. Anson has been identified as an attorney for both Dell Inc. and Dell Products; (2) Mr. Peterman has been

identified as an attorney for Dell Inc., Dell Technologies, and Dell Products; (3) during prosecution of the Dell ’696 Application, the ’012 Publication was cited in an Office Action in 2017, and Dell Inc.’s patent attorney, Mr. Anson, was involved in prosecution of the Dell ’696 Application; (4) during prosecution of the Dell ’658 Application, the ’012 Publication was cited in an Office Action in 2020, and Dell Inc.’s patent attorney, Mr. Peterman, was involved in prosecution of the Dell ’658 Application; (5) Dell Products is a wholly-owned subsidiary of Dell Inc. and the two entities have shared overlapping officers; (6) on information and belief (including Dell’s 10-K statements), the subject matter disclosed in Dell’s patents and patent applications relate to aspects of the Accused Products made and sold by Dell Inc.; (7) on information and belief, Dell Products has authorized Dell Inc. to practice its patents, including its patents relating to convertible devices such as the Accused Products, which cite the ’012 Publication; and (8) on information and belief, before the filing of this Complaint Dell Inc. and Dell Technologies Inc. were aware that the ’012 Publication matured into the ’844 patent.

Dell’s Induced Infringement

141. On information and belief, before the filing of this Complaint Dell Inc. and Dell Technologies Inc. knew that the Accused Products infringe the ’844 patent.

142. Before the filing of this Complaint, Dell Inc. and Dell Technologies Inc. knew that the Accused Products infringe at least claims 10 and 17 of the ’844 patent when used by customers or other users, when imported by others, and when sold or offered for sale by Dell Inc. and resellers such as Best Buy.

143. Before the filing of this Complaint, Dell Technologies Inc. has induced infringement and continues to induce infringement by actively encouraging Dell Inc. to directly

infringe at least claims 10 and 17 of the ’844 patent by facilitating Dell Inc.’s sales, offers for sale, and use of the Accused Products.

144. Before the filing of this Complaint, Dell Inc. has induced infringement and continues to induce infringement by actively encouraging resellers to directly infringe at least claims 10 and 17 of the ’844 patent by facilitating resellers’ sales and offers for sale of the Accused Products and by having the Accused Products manufactured and imported. On information and belief, Dell resellers include Best Buy. https://www.dell.com/en-us/lp/reseller_store_locator

145. Before the filing of this Complaint, Dell Inc. has induced infringement and continues to induce infringement by actively encouraging customers or other users to directly infringe at least claims 10 and 17 of the ’844 patent. Dell Inc. has provided with the Accused Products and on Dell’s website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claims 10 and 17 of the ’844 patent. For example, Dell’s website touts the availability of four display modes on its Latitude, Inspiron, and XPS 2-in-1 notebooks. *E.g.*, https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf (pp. 10-12); https://dl.dell.com/topicspdf/inspiron-13-7391-2-in-1-laptop_users-guide_en-us.pdf (pp. 9-10); and https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf (pp. 9-10).

Dell’s Willful Infringement

146. Dell has willfully infringed at least claims 10 and 17 of the ’844 patent. Dell’s offers for sale, sales, and uses of the Accused Products with provision of manuals and instruction

to purchasers that encourage use it knows will infringe the ’844 patent demonstrates the willful nature of Dell’s infringement.

147. On information and belief, as alleged above, Dell’s intellectual property department performs freedom-to-operate analyses and has a substantial head count and resources.

148. On information and belief, given job descriptions for Dell’s attorneys involving procedures for performing freedom-to-operate analyses, given Dell’s substantial intellectual property department, and given Dell’s knowledge of the ’688 patent and the related ’844 patent since before the filing of this Complaint, if Dell did not investigate whether the Accused Products infringe the ’844 patent, then Dell was willfully blind to a reasonable likelihood that the Accused Products infringe the ’844 patent.

149. The foregoing description of Dell’s infringement is based on publicly available information. LiTL reserves the right to modify this description, including, for example, on the basis of information about the Accused Products that it obtains during discovery.

150. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Dell’s infringement of the ’844 patent.

151. Dell’s infringement of the ’844 patent has damaged and continues to damage LiTL in an amount yet to be determined, of no less than a reasonable royalty.

COUNT III

(Infringement of U.S. Patent No. 9,563,229)

152. LiTL incorporates by reference and realleges all the foregoing paragraphs of the Complaint as if fully set forth herein.

Dell's Direct Infringement

153. Dell has directly infringed and continues to directly infringe, literally and/or equivalently, one or more claims of the '229 patent, including at least claim 1, including by importing, using, selling, and offering for sale in the United States the Accused Products.

154. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) are portable computers that are configurable between a plurality of display modes including at least a laptop mode, a frame mode, and an easel mode. For example:

Laptop mode

Frame mode

Easel mode

155. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) are portable computers comprising a display component and a base. For example:

156. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an accelerometer configured to generate orientation information indicative of a current display mode among the plurality of display modes of the portable computer. For example:

Table 22. Sensor

Sensor support
Ambient Light Sensor on the hinge-up (optional)
P-sensor on the hinge-up (optional)
1 Accelerometer in the base (system board) for both Clamshell and 2-in-1
1 Accelerometer (Accelerometer + Gyro) in the hinge-up sensor board (Upsell on clamshell with Proximity/ALS/IR camera and 100% attached on 2-in-1)

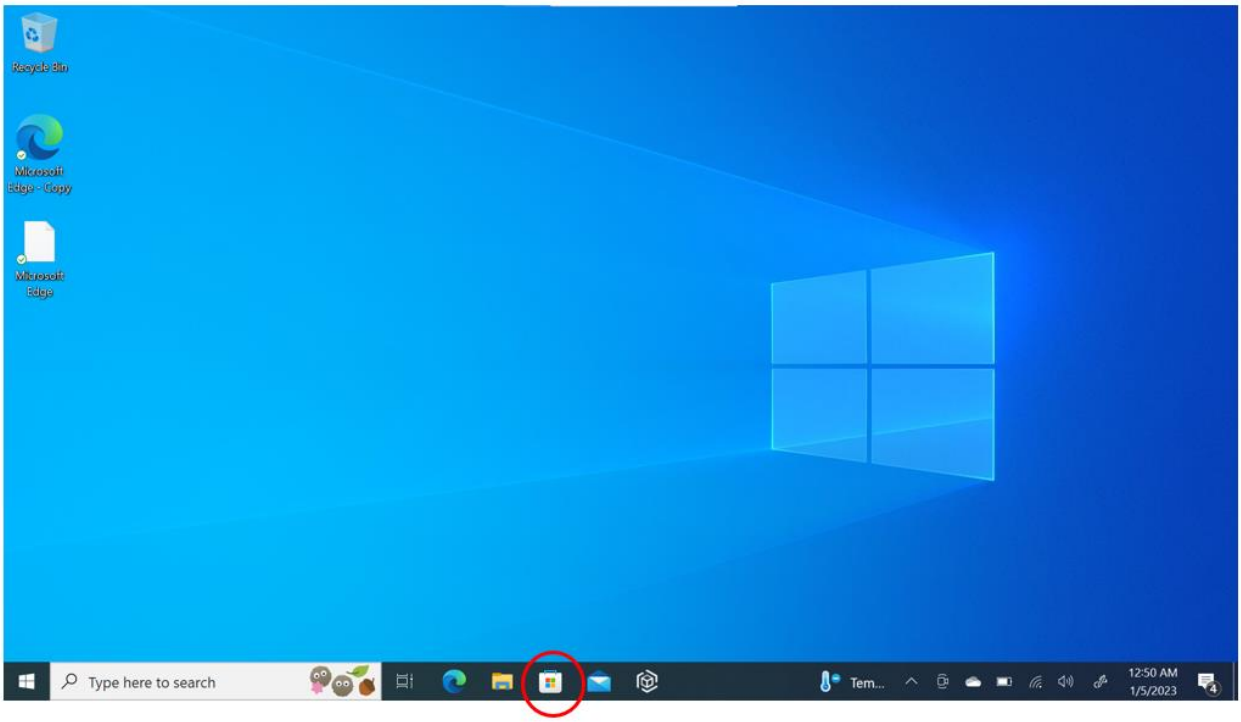
See, *e.g.*, Latitude 5330 2-in-1 Specifications, p. 23.

157. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display manager configured to display computer content on the display component and vary the computer content displayed responsive to the orientation information indicating a transition between at least the laptop and easel modes. For example:

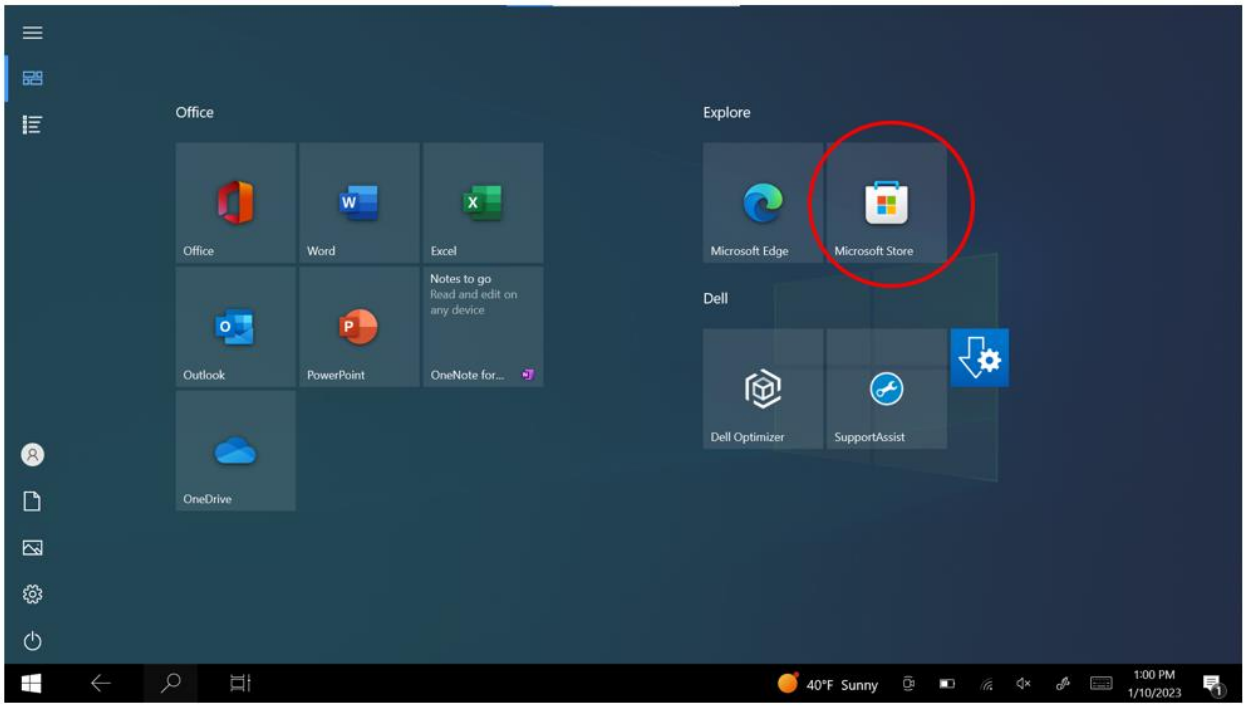
Display content in laptop mode

Display content in easel mode

158. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display manager configured to enlarge the computer content displayed on the display component responsive to a transition from the laptop mode to the easel mode. For example:



Computer content displayed in laptop mode



Computer content displayed in easel mode

159. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an interface between the display component and the base defining a longitudinal axis running along the

display component and the base about which the display component and the base are rotatable. For example:

See, e.g., Latitude 5330 2-in-1 Webpage.

Computer rotated along longitudinal axis

160. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an interface constructed and arranged such that rotating either the display component or the base about the longitudinal axis up to approximately 180 degrees from a closed mode configures the portable computer into the laptop mode. For example:

Laptop mode at approximately 180 degrees

161. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an interface with the laptop mode having a display component oriented towards an operator and a keyboard disposed within the base oriented to receive input from the operator. For example:

Laptop mode

162. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an interface constructed and arranged such that rotating either the display component or the base about the longitudinal axis beyond approximately 270 degrees from the closed mode transitions the portable computer for viewing in the frame mode or the easel mode. For example:

Frame mode

Easel mode

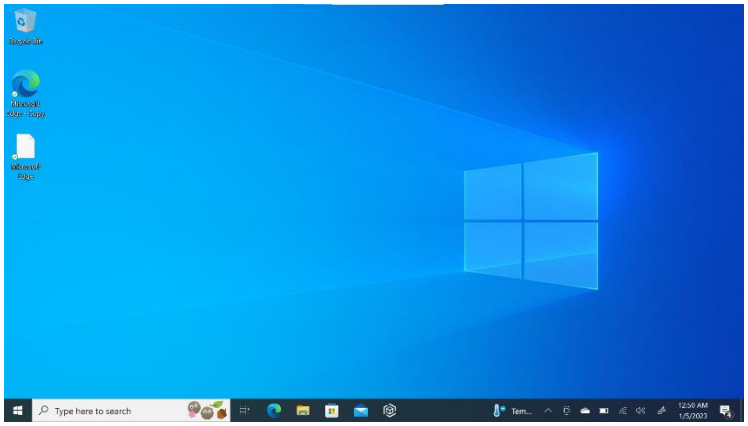
163. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an interface with the display component positioned toward the operator in frame mode, while the base contacts a substantially horizontal surface, and the keyboard is directed towards the substantially horizontal surface. For example:

Frame mode

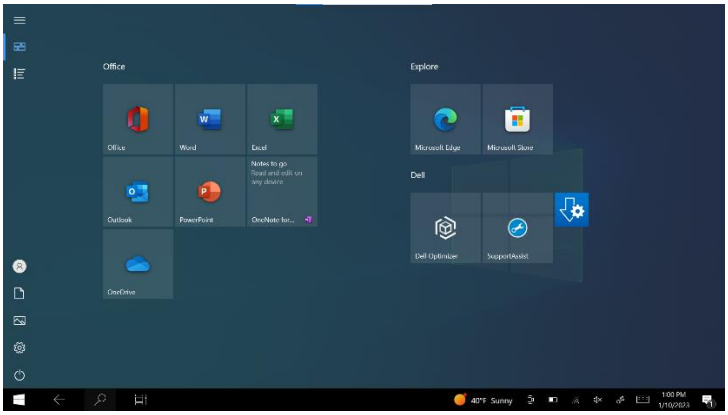
164. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an interface with the display component positioned toward the operator in easel mode, with the keyboard oriented away from the operator. For example:

Easel mode

165. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) comprise a portable computer configured to detect a transition to at least the easel mode and the frame mode based on the orientation information, automatically determine a display orientation of content, and disable the keyboard when the portable computer is in the frame mode. For example:



Laptop mode display orientation



Frame/easel mode display orientation

When you open your 2-in-1 laptop screen more than 225 degrees the Keyboard and Touchpad are disabled by default.

See, *e.g.*, Dell 2-in-1 Tablet Mode Support.

Dell's Knowledge of the '229 Patent

166. On information and belief, Dell knew of the '229 patent before the filing of this Complaint.

167. The '229 patent was cited during prosecution of a patent application owned by Dell Products that relates to Dell's convertible devices.

The Dell ’266 Application

168. For example, on October 27, 2020, Dell Products filed U.S. Patent Application No. 17/081,266 (“the Dell ’266 Application”), entitled “Information Handling System Transparent OLED Display And Method Of Control Thereof.”

169. On October 27, 2020, Dell Products filed a POA signed by Dell Inc.’s patent attorney, Mr. Peterman.

170. The Dell ’266 Application discusses problems associated with convertible laptops having clamshell and tablet configurations. Dell ’266 Application, Specification, [003].

171. On July 22, 2022, the examiner rejected the pending claims as anticipated and obvious, and in the Notice of References Cited listed the ’229 patent along with five other prior art references.

172. On information and belief, Dell’s knowledge of the ’688 patent by at least 2013 would have caused Dell to investigate, become aware of, and consider LiTL’s related patents, including the ’229 patent, before the filing of this Complaint.

173. On information and belief, Dell Inc. and Dell Technologies Inc. have known of the ’229 patent since before the filing of this Complaint at least because: (1) Mr. Peterman has been identified as an attorney for Dell Inc., Dell Technologies, and Dell Products; (2) during prosecution of the Dell ’266 Application, the ’229 patent was cited in an Office Action in 2022, and Dell Inc.’s patent attorney, Mr. Peterman, was involved in prosecution of the Dell ’266 Application; (3) Dell Products is a wholly-owned subsidiary of Dell Inc. and the two entities have shared overlapping officers; (4) on information and belief (including Dell’s 10-K statements), the subject matter disclosed in Dell’s patents and patent applications relate to aspects of the Accused Products made and sold by Dell Inc.; and (7) on information and belief,

Dell Products has authorized Dell Inc. to practice its patents, including its patents relating to convertible devices such as the Accused Products, which cite the ’229 patent.

Dell’s Induced Infringement

174. On information and belief, before the filing of this Complaint Dell Inc. and Dell Technologies Inc. knew that the Accused Products infringe the ’229 patent.

175. On information and belief, before the filing of this Complaint Dell Inc. and Dell Technologies Inc. knew that the Accused Products infringe at least claim 1 of the ’229 patent when used by customers or other users, when imported by others, and when sold or offered for sale by Dell Inc. and by resellers such as Best Buy.

176. Before the filing of this Complaint, Dell Technologies Inc. has induced infringement and continues to induce infringement by actively encouraging Dell Inc. to directly infringe at least claim 1 of the ’229 patent by facilitating Dell Inc.’s sales, offers for sale, and use of the Accused Products.

177. Before the filing of this Complaint, Dell Inc. has induced infringement and continues to induce infringement by actively encouraging resellers to directly infringe at least claim 1 of the ’229 patent by facilitating resellers’ sales and offers for sale of the Accused Products and by having the Accused Products manufactured and imported. On information and belief, Dell resellers include Best Buy. https://www.dell.com/en-us/lp/reseller_store_locator

178. Before the filing of this Complaint, Dell Inc. has induced infringement and continues to induce infringement by actively encouraging customers or other users to directly infringe at least claim 1 of the ’229 patent. Dell Inc. has provided with the Accused Products and on Dell’s website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 1 of the

’229 patent. For example, Dell’s website touts the availability of four display modes on its Latitude, Inspiron, and XPS 2-in-1 notebooks. *E.g.*, https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf (pp. 10-12); https://dl.dell.com/topicspdf/inspiron-13-7391-2-in-1-laptop_users-guide_en-us.pdf (pp. 9-10); and https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf (pp. 9-10).

Dell’s Willful Infringement

179. Dell has willfully infringed at least claim 1 of the ’229 patent. Dell’s offers for sale, sales, and uses of the Accused Products with provision of manuals and instruction to purchasers that encourage use it knows will infringe the ’229 patent demonstrates the willful nature of Dell’s infringement.

180. On information and belief, as alleged above, Dell’s intellectual property department performs freedom-to-operate analyses and has a substantial head count and resources.

181. On information and belief, given job descriptions for Dell’s attorneys involving procedures for performing freedom-to-operate analyses, given Dell’s substantial intellectual property department, and given Dell’s knowledge of the ’688 patent and the related ’229 patent since before the filing of this Complaint, if Dell did not investigate whether the Accused Products infringe the ’229 patent, then Dell was willfully blind to a reasonable likelihood that the Accused Products infringe the ’229 patent.

182. The foregoing description of Dell’s infringement is based on publicly available information. LiTL reserves the right to modify this description, including, for example, on the basis of information about the Accused Products that it obtains during discovery.

183. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Dell’s infringement of the ’229 patent.

184. Dell's infringement of the '229 patent has damaged and continues to damage LiTL in an amount yet to be determined, of no less than a reasonable royalty.

COUNT IV

(Infringement of U.S. Patent No. 10,289,154)

185. LiTL incorporates by reference and realleges all the foregoing paragraphs of the Complaint as if fully set forth herein.

Dell's Direct Infringement

186. Dell has directly infringed and continues to directly infringe, literally and/or equivalently, one or more claims of the '154 patent, including at least claim 1, including by importing, using, selling, and offering for sale in the United States the Accused Products.

187. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) are portable computers configurable between a plurality of display modes comprising a first mode and a second mode. For example:

First mode

Second mode

188. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display component comprising a display screen and a base comprising a keyboard and a touchpad. For example:

189. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a hinge assembly that rotatably couples the base to the display component, the hinge assembly being configured to permit the display component to rotate relative to the base up to at least 270 degrees from a closed position where the display screen faces the keyboard. For example:

See, *e.g.*, Latitude 5330 2-in-1 Webpage.

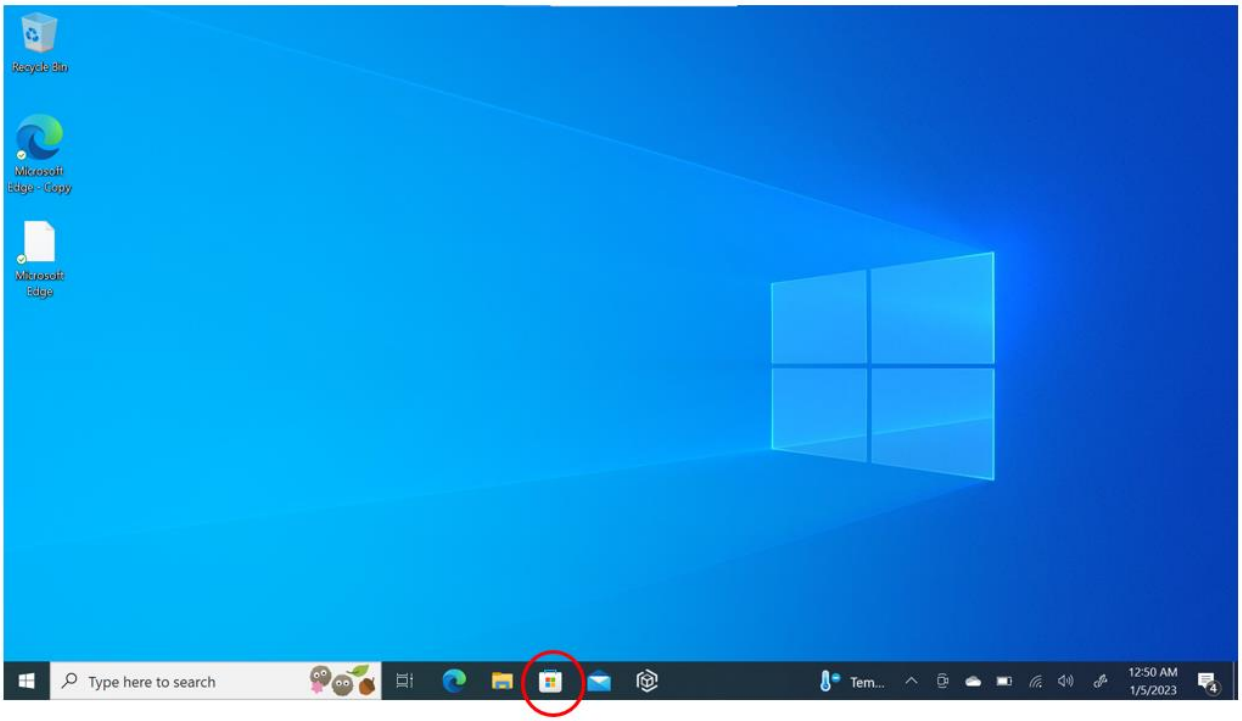
190. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an orientation sensor configured to generate orientation information indicative of an orientation of at least part of the portable computer. For example:

Table 22. Sensor

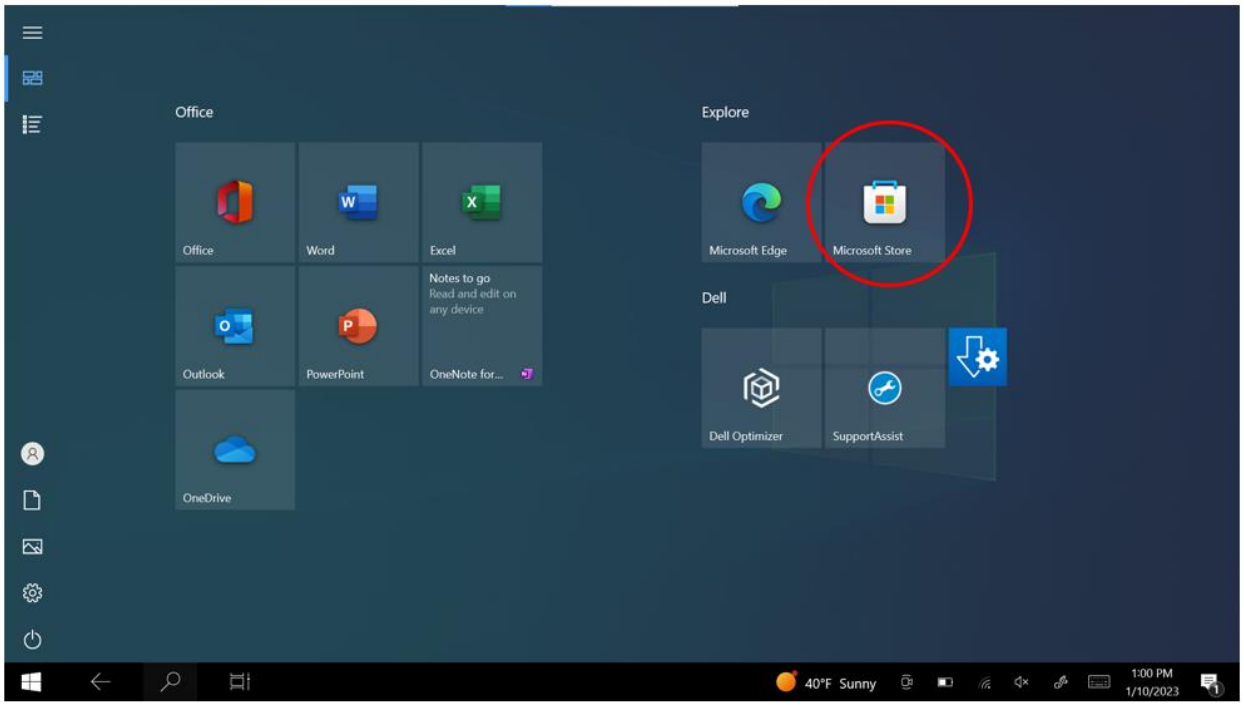
Sensor support
Ambient Light Sensor on the hinge-up (optional)
P-sensor on the hinge-up (optional)
1 Accelerometer in the base (system board) for both Clamshell and 2-in-1
1 Accelerometer (Accelerometer + Gyro) in the hinge-up sensor board (Upsell on clamshell with Proximity/ALS/IR camera and 100% attached on 2-in-1)

See, e.g., Latitude 5330 2-in-1 Specifications, p. 23.

191. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display manager configured to detect a current display mode from among the plurality of display modes based at least in part on the orientation information and enlarge at least some computer content displayed on the display screen when the current display mode transitions from the first mode to the second mode. For example:



Computer content displayed in first mode



Computer content displayed in second mode

192. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display component in a first position, relative to the base in the first mode, and a second position relative to the base that is different from the first position in the second mode. For example:

First position in first mode

Second position in second mode

Dell's Knowledge of the '154 Patent

193. Since at least the filing of this Complaint, Dell knows of the '154 patent.

194. On information and belief, Dell's knowledge of the '688 patent by at least 2013 would have caused Dell to investigate, become aware of, and consider LiTL's related patents, including the '154 patent, before the filing of this Complaint.

Dell's Induced Infringement

195. Since at least the filing of this Complaint, Dell knows that the Accused Products infringe at least claim 1 of the '154 patent when used by customers or other users, when imported by others, and when sold or offered for sale by Dell Inc. and resellers such as Best Buy.

196. Since at least the filing of this Complaint, Dell Technologies Inc. induces infringement by actively encouraging Dell Inc. to directly infringe at least claim 1 of the '154 patent by facilitating Dell Inc.'s sales, offers for sale, and use of the Accused Products.

197. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging resellers to directly infringe at least claim 1 of the '154 patent by facilitating resellers' sales and offers for sale of the Accused Products and by having the

Accused Products manufactured and imported. On information and belief, Dell resellers include Best Buy. https://www.dell.com/en-us/lp/reseller_store_locator

198. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging customers or other users to directly infringe at least claim 1 of the ’154 patent. Dell Inc. has provided with the Accused Products and on Dell’s website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 1 of the ’154 patent. For example, Dell’s website touts the availability of four display modes on its Latitude, Inspiron, and XPS 2-in-1 notebooks. *E.g.*, https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf (pp. 10-12); https://dl.dell.com/topicspdf/inspiron-13-7391-2-in-1-laptop_users-guide_en-us.pdf (pp. 9-10); and https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf (pp. 9-10).

Dell’s Willful Infringement

199. Dell is willfully infringing at least claim 1 of the ’154 patent. Dell’s offers for sale, sales, and uses of the Accused Products with provision of manuals and instruction to purchasers that encourage use it knows will infringe the ’154 patent demonstrates the willful nature of Dell’s infringement.

200. On information and belief, as alleged above, Dell’s intellectual property department performs freedom-to-operate analyses and has a substantial head count and resources.

201. On information and belief, given job descriptions for Dell’s attorneys involving procedures for performing freedom-to-operate analyses, given Dell’s substantial intellectual property department, and given Dell’s knowledge of the ’688 patent and the related ’154 patent

since before the filing of this Complaint, if Dell did not investigate whether the Accused Products infringe the ’154 patent, then Dell was willfully blind to a reasonable likelihood that the Accused Products infringe the ’154 patent.

202. The foregoing description of Dell’s infringement is based on publicly available information. LiTL reserves the right to modify this description, including, for example, on the basis of information about the Accused Products that it obtains during discovery.

203. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Dell’s infringement of the ’154 patent.

204. Dell’s infringement of the ’154 patent has damaged and continues to damage LiTL in an amount yet to be determined, of no less than a reasonable royalty.

COUNT V

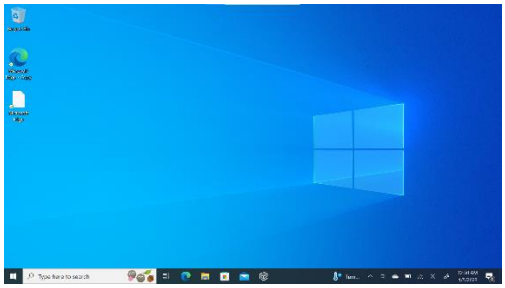
(Infringement of U.S. Patent No. 9,003,315)

205. LiTL incorporates by reference and realleges all the foregoing paragraphs of the Complaint as if fully set forth herein.

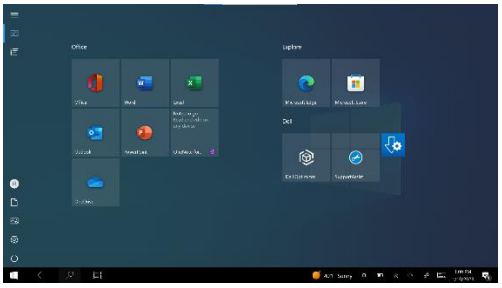
Dell’s Direct Infringement

206. Dell has directly infringed and continues to directly infringe, literally and/or equivalently, one or more claims of the ’315 patent, including at least claim 1, including by importing, using, selling, and offering for sale in the United States the Accused Products.

207. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) comprise a customized user interface for a computer system with a plurality selectable I/O profiles configured to present computer operations to a user in a format configured to a selected I/O profile on a display component of the computer system, the user interface comprising. For example:



First customized user interface for an organizational view in a first computer system configuration



Second customized user interface for an organizational view in a second computer system configuration

208. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include at least one processor and a map based graphical user interface, executing on the at least one processor operatively connected to a memory of the computer system. The map based graphical user interface, when executing, is configured to display information on the display component of the computer system. For example:

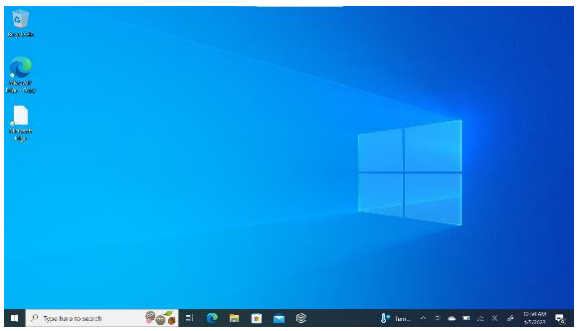
Processor
12th Gen Intel® Core™ i5-1235U, vPro® Essentials (12MB, 10 core, 12 thread, up to 4.40 GHz Turbo)

Memory ⓘ
8 GB, DDR4, 3200 MHz, integrated

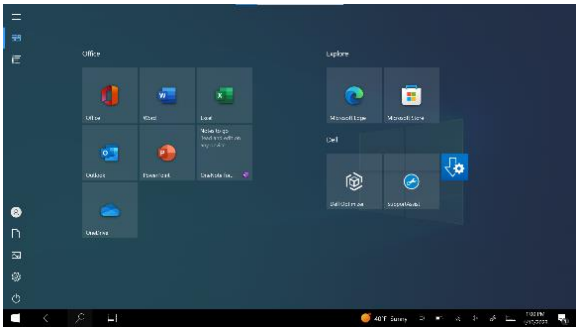
Processor and Memory Specifications

See, e.g., Latitude 5330 2-in-1 Webpage.

209. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a map based user interface further configured to display a plurality of views of a plurality of visual representations of computer content on the computer system, wherein the computer content includes at least one of selectable digital content, executable computer applications, configurable computer settings, selectable computer operations and passive digital content. For example:

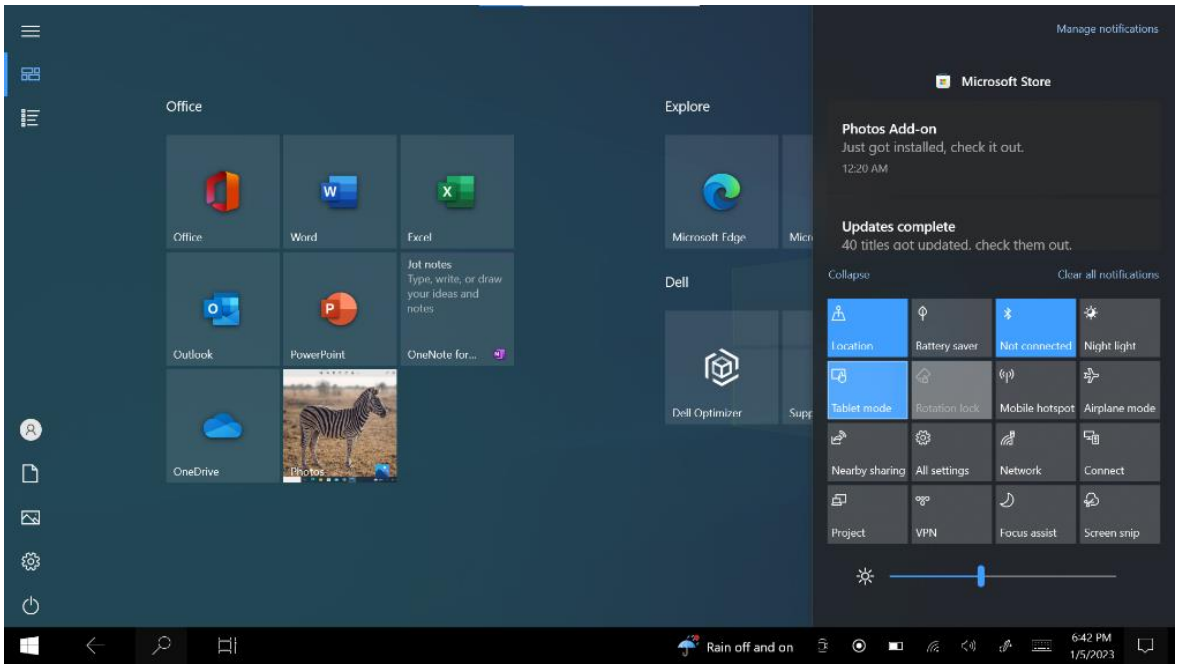


Visual representations of computer content in a first organizational view

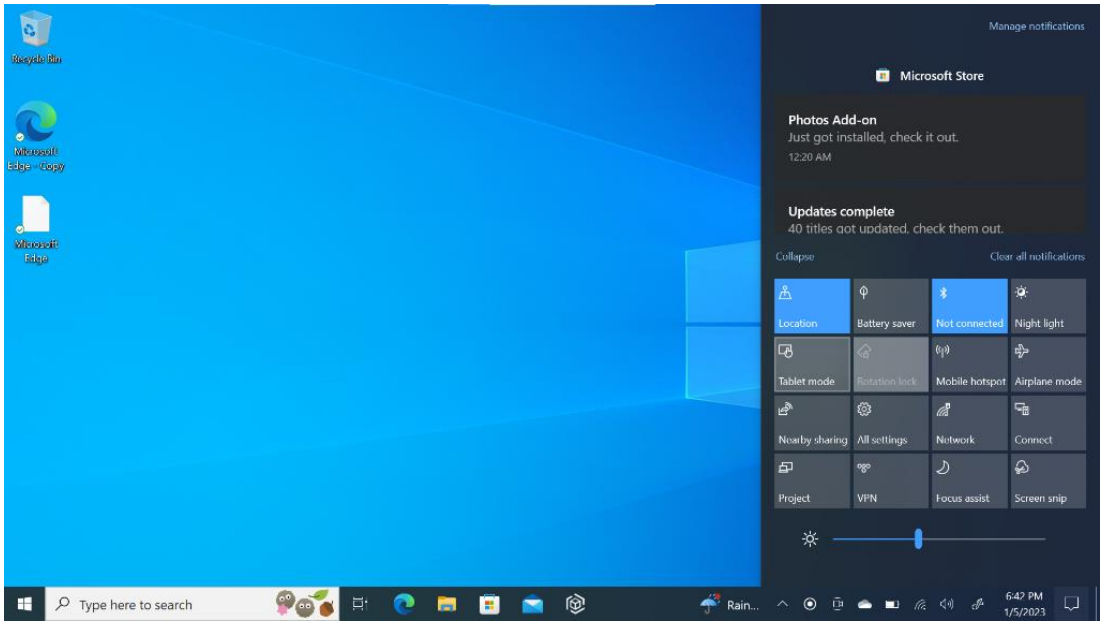


Visual representations of computer content in a second organizational view

210. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) display the plurality of visual representations of computer content rendered on the display component, wherein the plurality of visual representations of computer content include an association to a first home view of the plurality of views. For example:

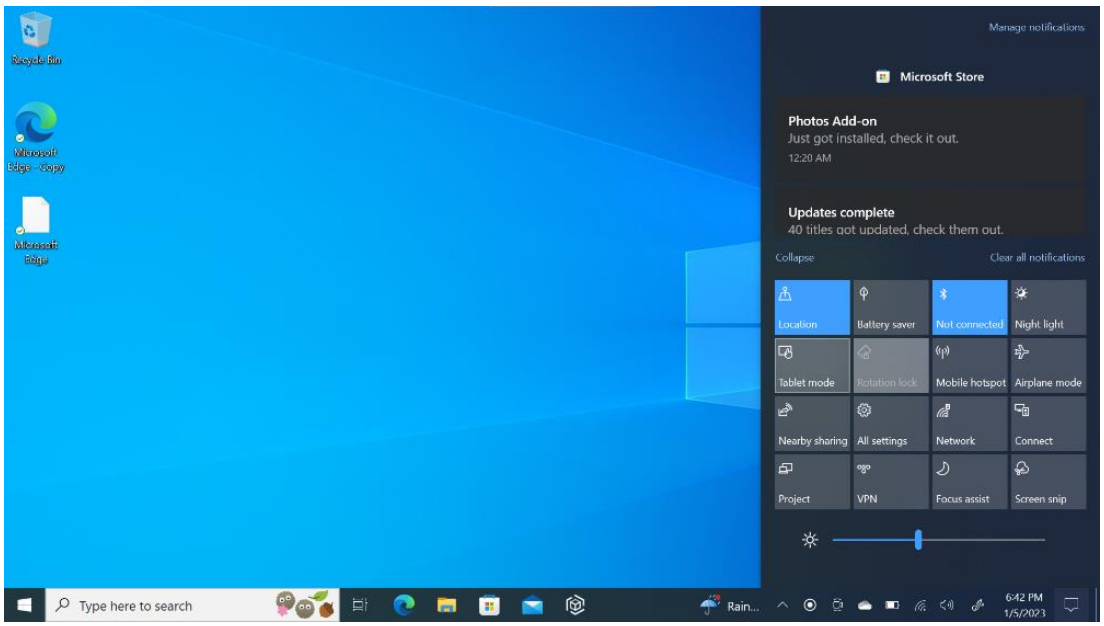


Second organizational view (showing Tablet Mode selected)

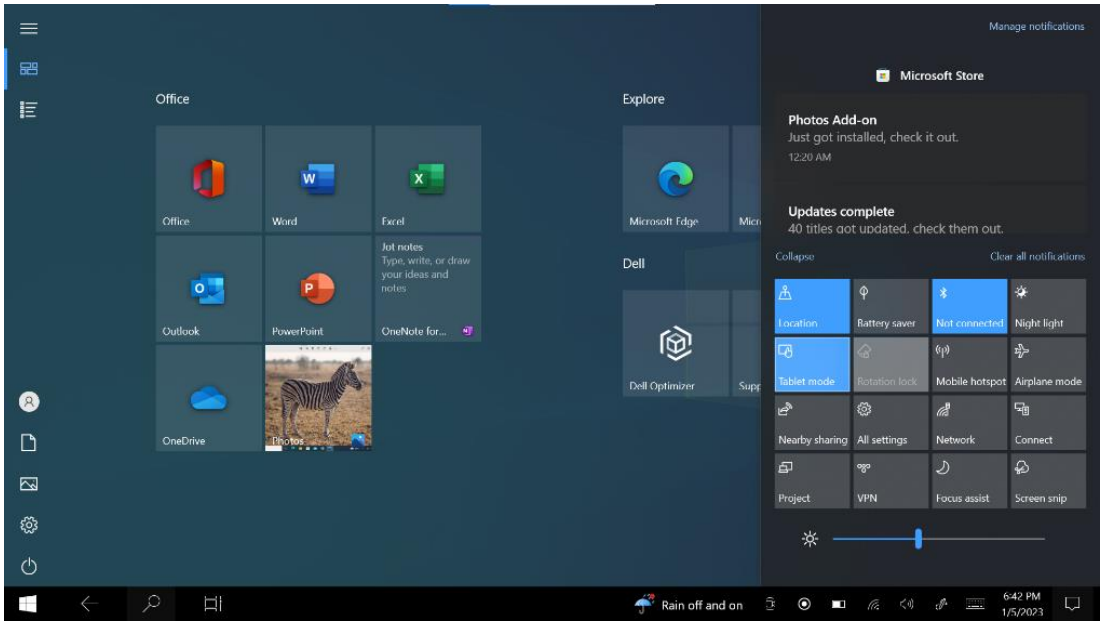


First home view (showing view after Tablet Mode is de-selected)

211. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) display the first home view including a display of the computer content, and wherein the each of the plurality of visual representations is responsive to focus and execution, wherein execution includes selecting the visual representation. For example:

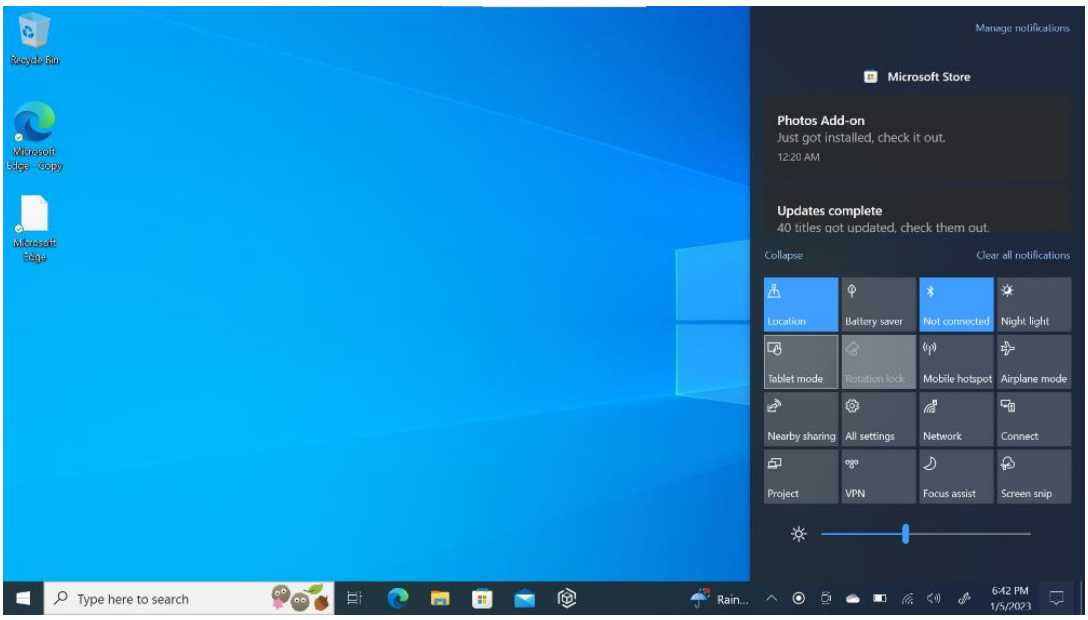


Plurality of visual representations in the first home view
(showing Tablet Mode button responsive to focus)



Second organizational view (which is transitioned to after Tablet Mode button is selected)

212. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include the first home view as a first organizational view of at least one application and computer content displayed responsive to activation of the system. For example:



First home view

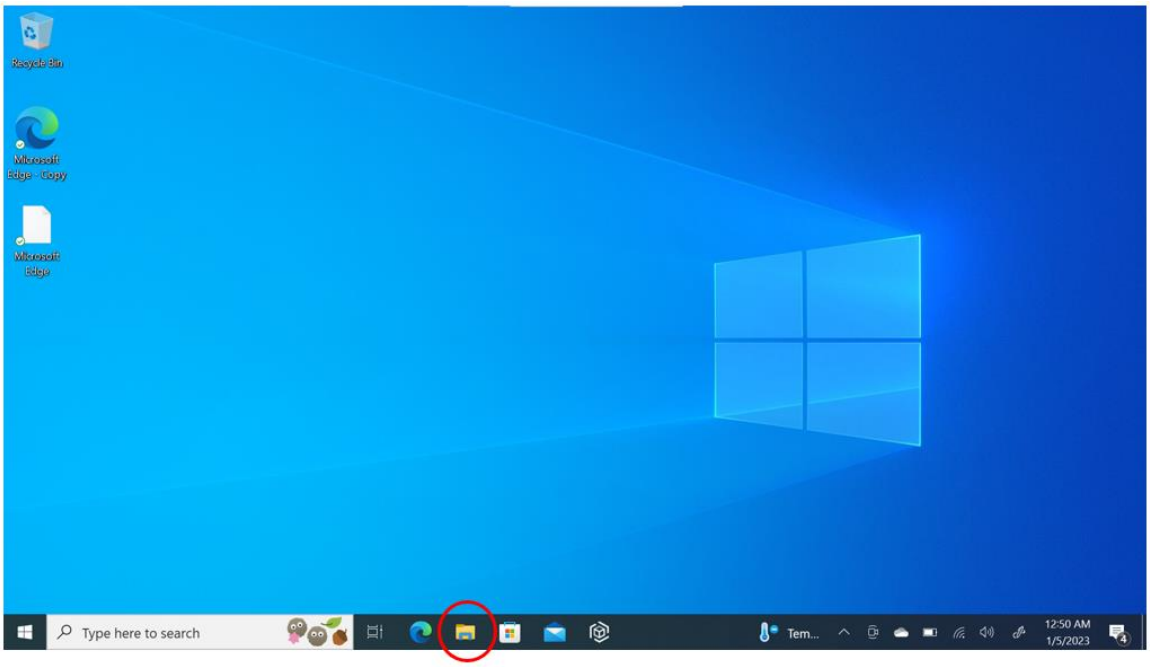
213. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an execution component, executing on the at least one processor, configured to identify at least a first and a second computer system configuration based on sensor input indicating a position of the display component relative to a base component. For example:

First computer system configuration

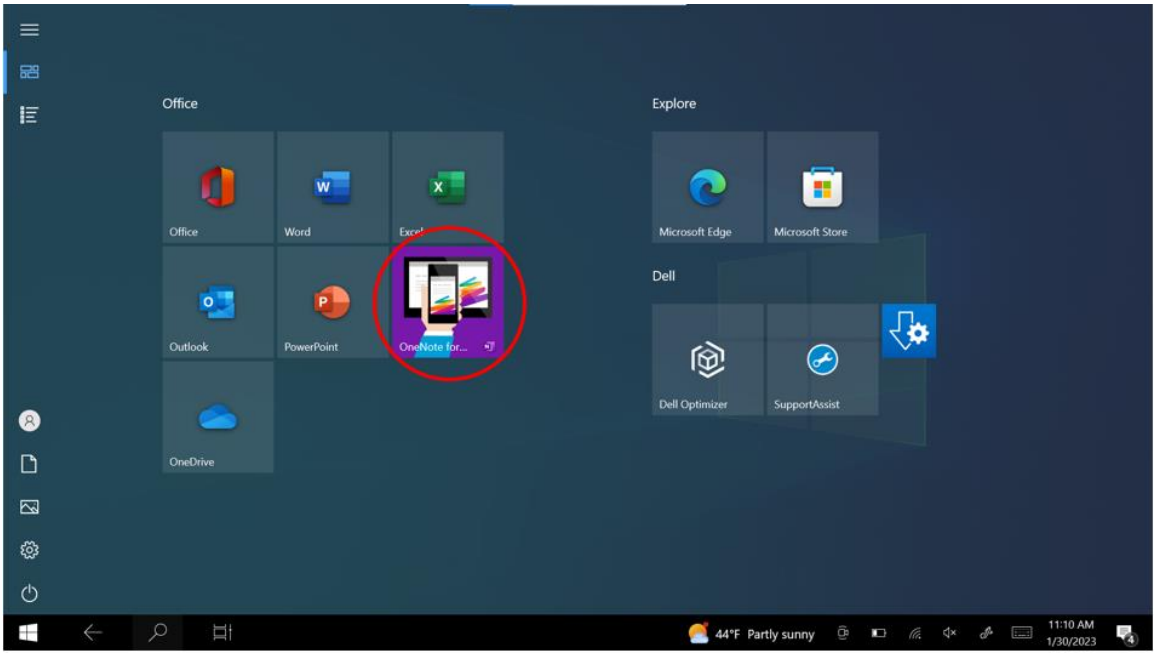
Second computer system configuration

214. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an execution component configured to select, responsive to the sensor input, a first home view from the plurality of views for the first computer system configuration, wherein the first home view is configured to organize a first set of the plurality of visual representations. The execution component is further configured to filter the first set of visual representations to present content that is optimized for viewing in the second system configuration at least in part by identifying

content to filter, removing the identified content from the first set of visual representations, and generating a second set of visual representations based on the filtered first set of visual representations, wherein the second set of visual representations includes at least one different member than the first set of visual representations. For example:

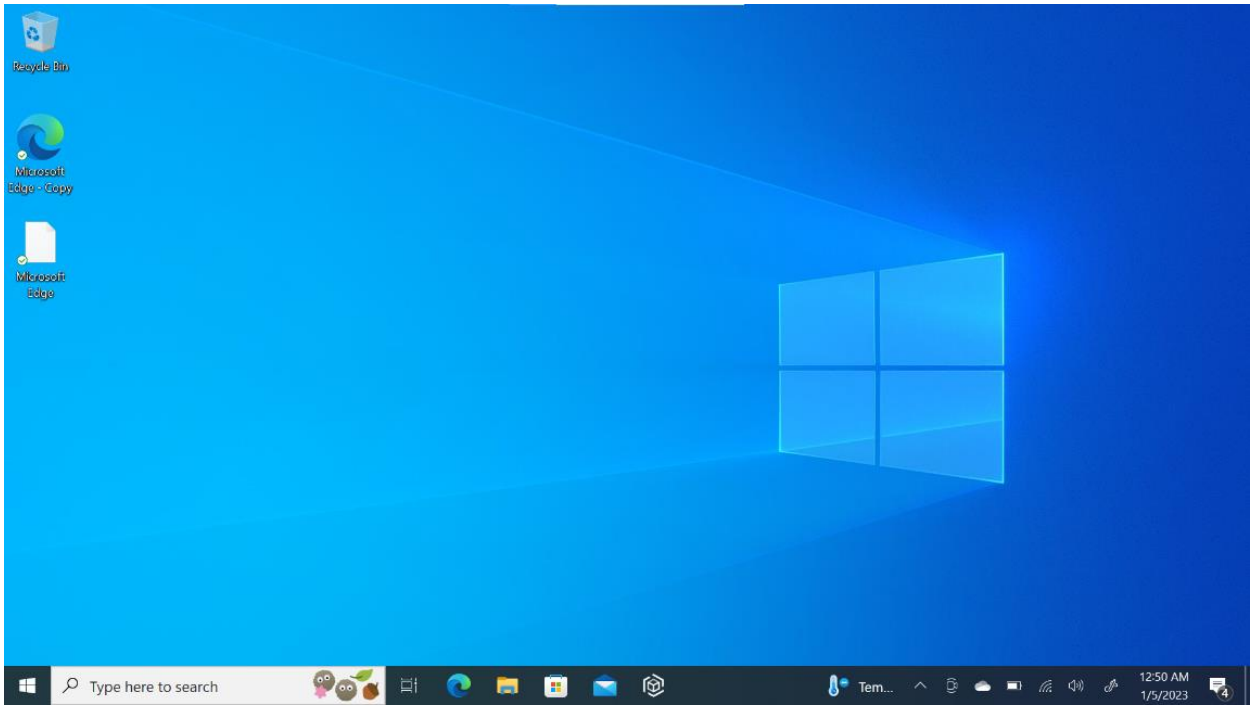


First home view for a first computer system configuration

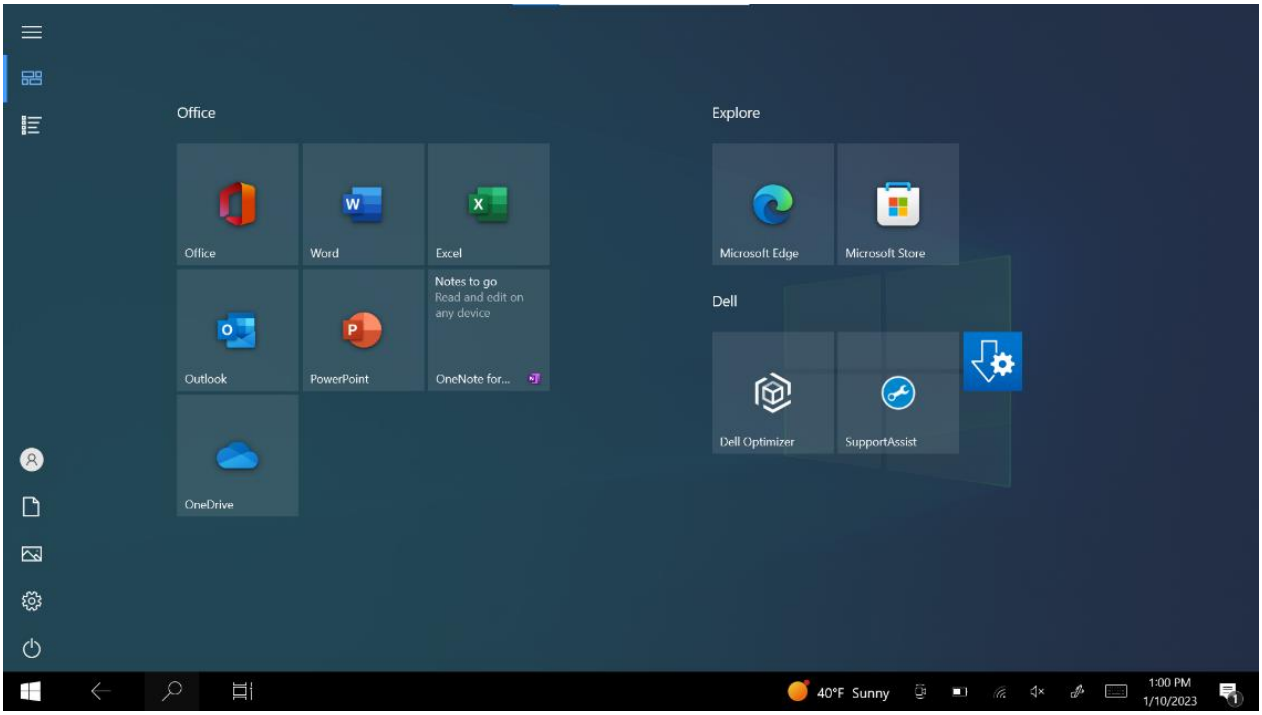


Second organizational view for a second computer system configuration

215. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an execution component configured to transition, automatically in response to the sensor input, the display component between at least the first home view of the plurality of views and a second default content view of the plurality of views, wherein the second default content view is configured to organize the second set of visual representations, wherein the second default content view is a second organizational view of at least one application and computer content, and wherein the sensor input indicates a transition to the second computer system configuration. For example:



First home view



Second default content view

Dell's Knowledge of the '315 Patent

216. Since at least the filing of this Complaint, Dell knows of the '315 patent.

217. On information and belief, Dell's knowledge of the '688 patent by at least 2013 would have caused Dell to investigate, become aware of, and consider LiTL's related patents, including the '315 patent, before the filing of this Complaint.

Dell's Induced Infringement

218. Since at least the filing of this Complaint, Dell knows that the Accused Products infringe at least claim 1 of the '315 patent when used by customers or other users, when imported by others, and when sold or offered for sale by Dell Inc. and resellers such as Best Buy.

219. Since at least the filing of this Complaint, Dell Technologies Inc. induces infringement by actively encouraging Dell Inc. to directly infringe at least claim 1 of the '315 patent by facilitating Dell Inc.'s sales, offers for sale, and use of the Accused Products.

220. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging resellers to directly infringe at least claim 1 of the ’315 patent by facilitating resellers’ sales and offers for sale of the Accused Products and by having the Accused Products manufactured and imported. On information and belief, Dell resellers include Best Buy. https://www.dell.com/en-us/lp/reseller_store_locator

221. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging customers or other users to directly infringe at least claim 1 of the ’315 patent. Dell Inc. has provided with the Accused Products and on Dell’s website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 1 of the ’315 patent. For example, Dell’s website touts the availability of four display modes on its Latitude, Inspiron, and XPS 2-in-1 notebooks. *E.g.*, https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf (pp. 10-12); https://dl.dell.com/topicspdf/inspiron-13-7391-2-in-1-laptop_users-guide_en-us.pdf (pp. 9-10); and https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf (pp. 9-10).

Dell’s Willful Infringement

222. Dell is willfully infringing at least claim 1 of the ’315 patent. Dell’s offers for sale, sales, and uses of the Accused Products with provision of manuals and instruction to purchasers that encourage use it knows will infringe the ’315 patent demonstrates the willful nature of Dell’s infringement.

223. On information and belief, as alleged above, Dell’s intellectual property department performs freedom-to-operate analyses and has a substantial head count and resources.

224. On information and belief, given job descriptions for Dell's attorneys involving procedures for performing freedom-to-operate analyses, given Dell's substantial intellectual property department, and given Dell's knowledge of the '688 patent and the related '315 patent since before the filing of this Complaint, if Dell did not investigate whether the Accused Products infringe the '315 patent, then Dell was willfully blind to a reasonable likelihood that the Accused Products infringe the '315 patent.

225. The foregoing description of Dell's infringement is based on publicly available information. LiTL reserves the right to modify this description, including, for example, on the basis of information about the Accused Products that it obtains during discovery.

226. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Dell's infringement of the '315 patent.

227. Dell's infringement of the '315 patent has damaged and continues to damage LiTL in an amount yet to be determined, of no less than a reasonable royalty.

COUNT VI

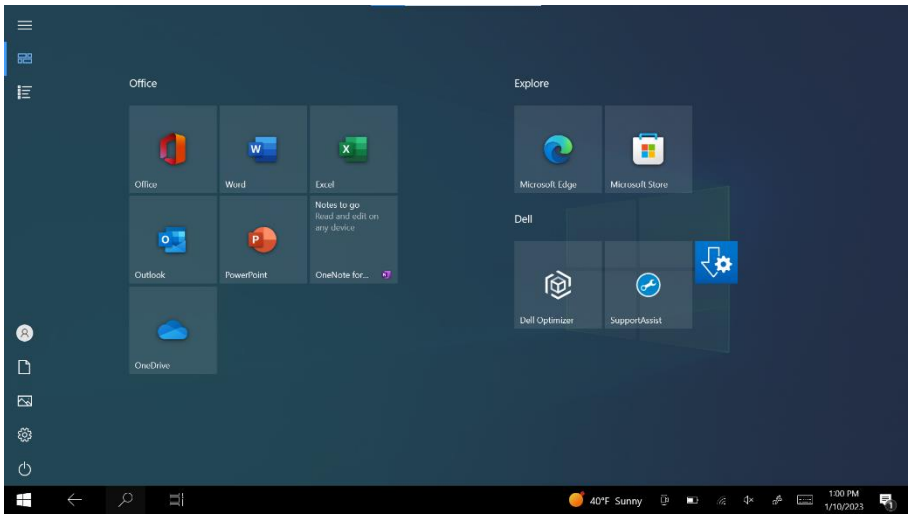
(Infringement of U.S. Patent No. 9,880,715)

228. LiTL incorporates by reference and realleges all the foregoing paragraphs of this Complaint as if fully set forth herein.

Dell's Direct Infringement

229. Dell has directly infringed and continues to directly infringe, literally and/or equivalently, one or more of the claims of the '715 patent, including at least claim 1, including by importing, using, selling, and offering for sale in the United States the Accused Products.

230. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a customized user interface to display computer content on a display component of a computer system including a keyboard. For example:



Screenshot from Latitude 5330 2-in-1, home screen in tablet mode.

231. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a user interface comprising at least one processor operatively connected to a memory of the computer system. For example:

Processor 12th Gen Intel® Core™ i5-1235U, vPro® Essentials (12MB, 10 core, 12 thread, up to 4.40 GHz Turbo)

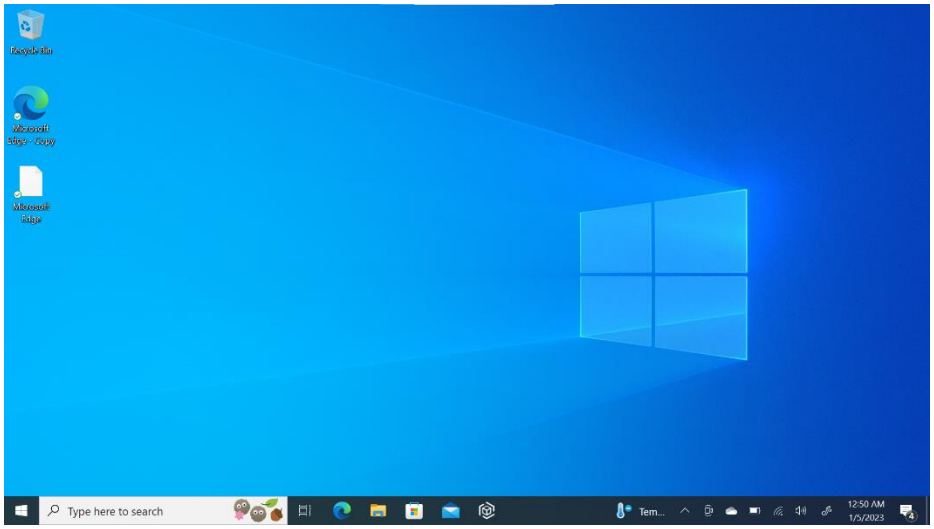
Memory ⓘ 8 GB, DDR4, 3200 MHz, integrated

Processor and Memory Specifications

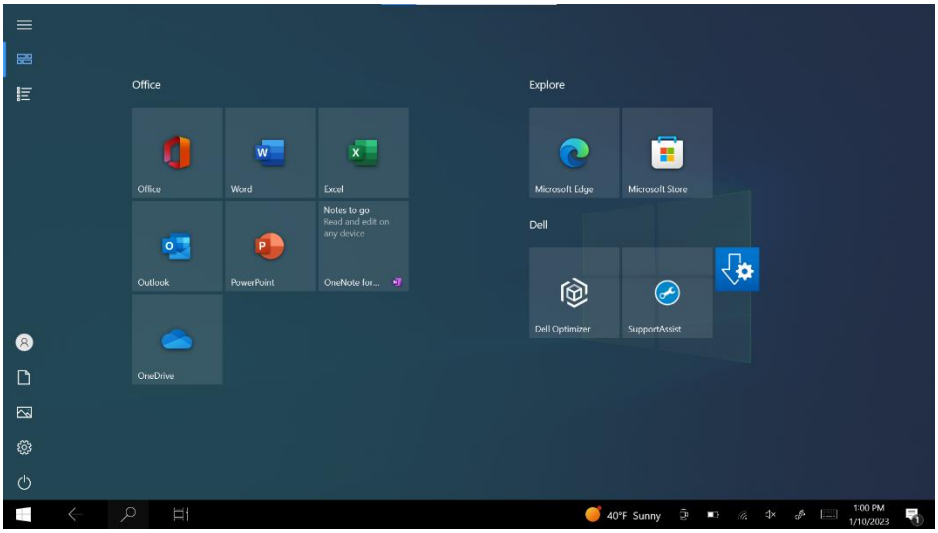
See, *e.g.*, Latitude 5330 2-in-1 Webpage.

232. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a graphical user interface, executing on the at least one processor, configured to display the computer content on the display component of the computer system. For example:

233. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a graphical user interface configured to display a plurality of views of a plurality of visual representations of computer content. For example, the Latitude 5330 2-in-1 is configured to display a home screen in laptop mode and a home screen in tablet mode:

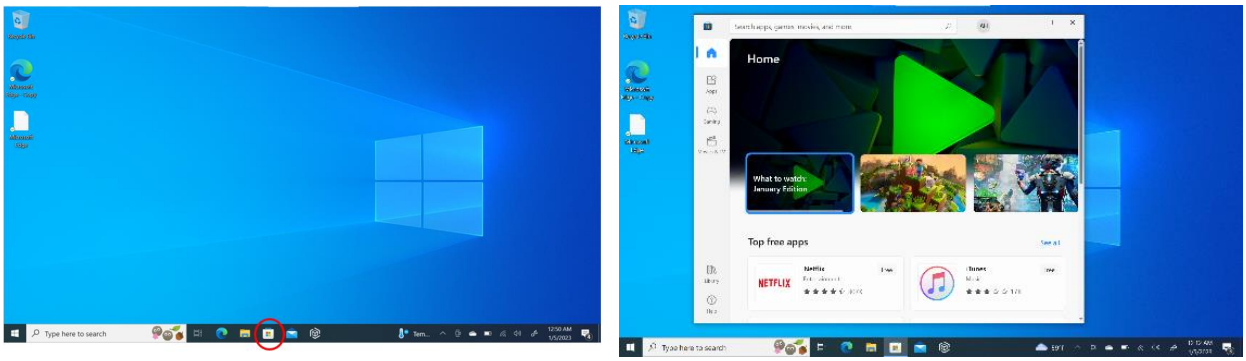


First view

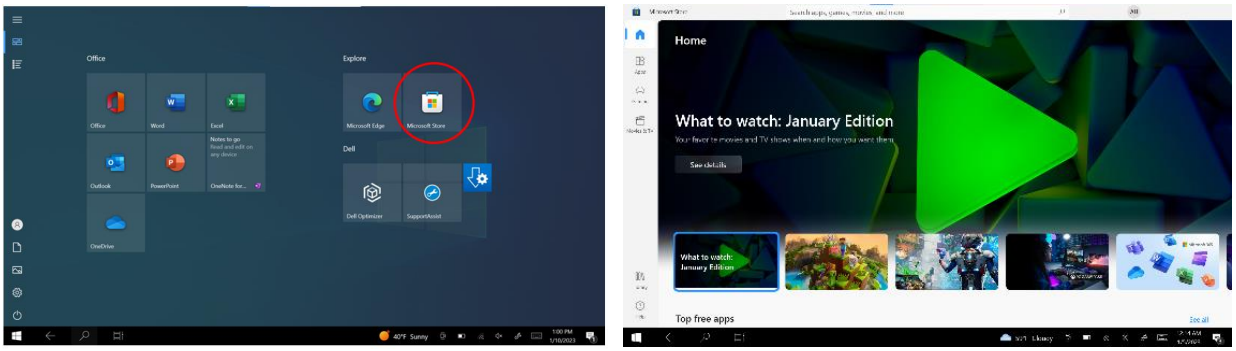


Second view

234. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include computer content that includes at least one of selectable digital content, selectable computer operations and passive digital content. For example, the Microsoft Store app can be selected from the task bar in laptop mode and in tablet mode:



Microsoft Store selected in first view



Microsoft Store selected in second view

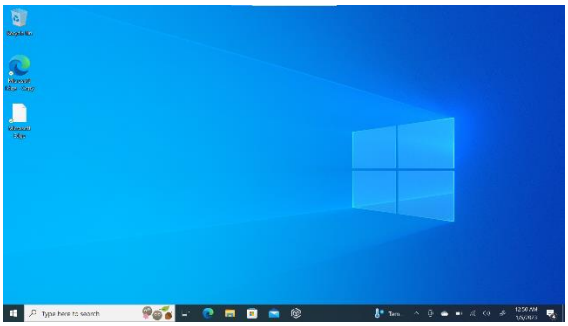
235. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an execution component, executing on the at least one processor, configured to detect a current computer system configuration from at least a first computer system configuration where the keyboard is operable to receive input from an operator of the computer system to control the computer system and a second computer system configuration where the keyboard is inoperable to receive input from the operator of the computer system to control the computer system; select one of the plurality of views for display on the computer system in response to the detected current computer system configuration; and transition the display component to the selected one of the plurality of views. For example, the keyboard in the Latitude 5330 2-in-1 is operable in clamshell mode and inoperable in tent/stand/tablet mode:

First computer system configuration

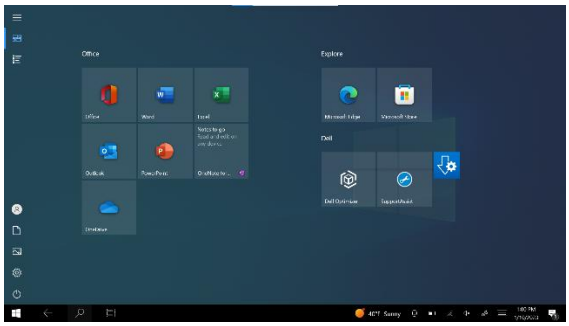
Second computer system configuration

When you open your 2-in-1 laptop screen more than 225 degrees the Keyboard and Touchpad are disabled by default.

See, e.g., Dell 2-in-1 Tablet Mode Support.



First view



Second view

Dell's Knowledge of the '715 Patent

236. Since at least the filing of this Complaint, Dell knows of the '715 patent.

237. On information and belief, Dell's knowledge of the '688 patent by at least 2013 would have caused Dell to investigate, become aware of, and consider LiTL's related patents, including the '715 patent, before the filing of this Complaint.

Dell's Induced Infringement

238. Since at least the filing of this Complaint, Dell knows that the Accused Products infringe at least claim 1 of the '715 patent when used by customers or other users, when imported by others, and when sold or offered for sale by Dell Inc. and resellers such as Best Buy.

239. Since at least the filing of this Complaint, Dell Technologies Inc. induces infringement by actively encouraging Dell Inc. to directly infringe at least claim 1 of the '715 patent by facilitating Dell Inc.'s sales, offers for sale, and use of the Accused Products.

240. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging resellers to directly infringe at least claim 1 of the '715 patent by facilitating resellers' sales and offers for sale of the Accused Products and by having the Accused Products manufactured and imported. On information and belief, Dell resellers include Best Buy. https://www.dell.com/en-us/lp/reseller_store_locator

241. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging customers or other users to directly infringe at least claim 1 of the '715 patent. Dell Inc. has provided with the Accused Products and on Dell's website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 1 of the '715 patent. For example, Dell's website touts the availability of four display modes on its Latitude, Inspiron, and XPS 2-in-1 notebooks. *E.g.*, https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf (pp. 10-12); https://dl.dell.com/topicspdf/inspiron-13-7391-2-

in-1-laptop_users-guide_en-us.pdf (pp. 9-10); and https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf (pp. 9-10).

Dell's Willful Infringement

242. Dell is willfully infringing at least claim 1 of the '715 patent. Dell's offers for sale, sales, and uses of the Accused Products with provision of manuals and instruction to purchasers that encourage use it knows will infringe the '715 patent demonstrates the willful nature of Dell's infringement.

243. On information and belief, as alleged above, Dell's intellectual property department performs freedom-to-operate analyses and has a substantial head count and resources.

244. On information and belief, given job descriptions for Dell's attorneys involving procedures for performing freedom-to-operate analyses, given Dell's substantial intellectual property department, and given Dell's knowledge of the '688 patent and the related '715 patent since before the filing of this Complaint, if Dell did not investigate whether the Accused Products infringe the '715 patent, then Dell was willfully blind to a reasonable likelihood that the Accused Products infringe the '715 patent.

245. The foregoing description of Dell's infringement is based on publicly available information. LiTL reserves the right to modify this description, including, for example, on the basis of information about the Accused Products that it obtains during discovery.

246. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Dell's infringement of the '715 patent.

247. Dell's infringement of the '715 patent has damaged and continues to damage LiTL in an amount yet to be determined, of no less than a reasonable royalty.

COUNT VII

(Infringement of U.S. Patent No. 10,564,818)

248. LiTL incorporates by reference and realleges all the foregoing paragraphs of this Complaint as if fully set forth herein.

Dell's Direct Infringement

249. Dell has directly infringed and continues to directly infringe, literally and/or equivalently, one or more of the claims of the '818 patent, including at least claim 1, including by importing, using, selling, and offering for sale in the United States the Accused Products.

250. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include one non-transitory computer-readable storage medium storing processor-executable instructions that, when executed by at least one processor in a computer system comprising a display and a keyboard and being configurable between a plurality of computer system configurations, cause the at least one processor to perform a method. For example:

Processor
12th Gen Intel® Core™ i5-1235U, vPro® Essentials (12MB, 10 core, 12 thread, up to 4.40 GHz Turbo)

Memory ⓘ
8 GB, DDR4, 3200 MHz, integrated

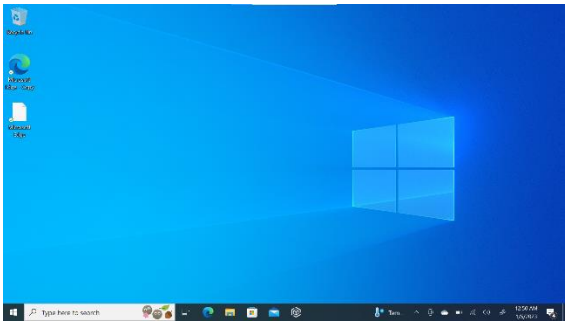
Processor and Memory Specifications

See, *e.g.*, Latitude 5330 2-in-1 Webpage.

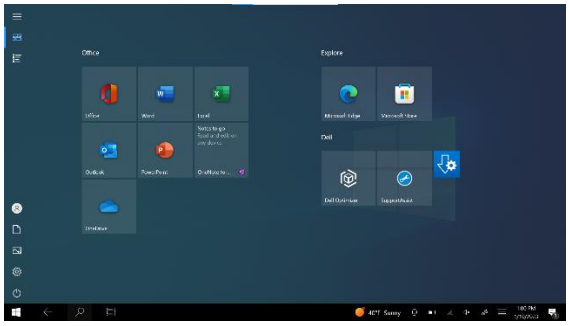
First computer system configuration

Second computer system configuration

251. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a processor to perform a method displaying a plurality of views of a plurality of visual representations of computer content. For example:



First view in a first configuration



Second view in a second configuration

252. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a processor to perform a method detecting a current computer system configuration from at least a first computer system configuration of the plurality of computer system configurations where the keyboard is operable to receive input from an operator of the computer system to control the computer system and a second computer system configuration of the plurality of computer system configurations where the keyboard is inoperable to receive input from the operator of the computer system to control the computer system. For example:

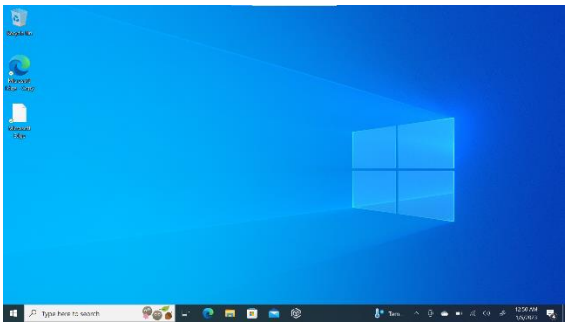
First computer system configuration

Second computer system configuration

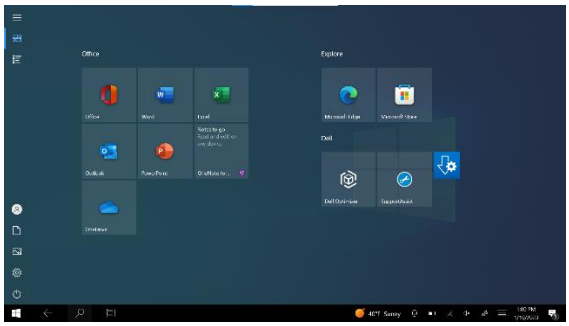
When you open your 2-in-1 laptop screen more than 225 degrees the Keyboard and Touchpad are disabled by default.

See, e.g., Dell 2-in-1 Tablet Mode Support.

253. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a processor to perform a method selecting one of the plurality of views for display on the computer system in response to the detected current computer system configuration; transitioning to the selected one of the plurality of views; and displaying the selected one of the plurality of views. For example:



First view in a first configuration



Second view in a second configuration

Dell's Knowledge of the '818 Patent

254. Since at least the filing of this Complaint, Dell knows of the '818 patent.

255. On information and belief, Dell's knowledge of the '688 patent by at least 2013 would have caused Dell to investigate, become aware of, and consider LiTL's related patents, including the '818 patent, before the filing of this Complaint.

Dell's Induced Infringement

256. Since at least the filing of this Complaint, Dell knows that the Accused Products infringe at least claim 1 of the '818 patent when used by customers or other users, when imported by others, and when sold or offered for sale by Dell Inc. and resellers such as Best Buy.

257. Since at least the filing of this Complaint, Dell Technologies Inc. induces infringement by actively encouraging Dell Inc. to directly infringe at least claim 1 of the '818 patent by facilitating Dell Inc.'s sales, offers for sale, and use of the Accused Products.

258. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging resellers to directly infringe at least claim 1 of the '818 patent by facilitating resellers' sales and offers for sale of the Accused Products and by having the Accused Products manufactured and imported. On information and belief, Dell resellers include Best Buy. https://www.dell.com/en-us/lp/reseller_store_locator

259. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging customers or other users to directly infringe at least claim 1 of the '818 patent. Dell Inc. has provided with the Accused Products and on Dell's website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 1 of the '818 patent. For example, Dell's website touts the availability of four display modes on its Latitude, Inspiron, and XPS 2-in-1 notebooks. *E.g.*, https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf (pp. 10-12); https://dl.dell.com/topicspdf/inspiron-13-7391-2-in-1-laptop_users-guide_en-us.pdf (pp. 9-10); and https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf (pp. 9-10).

Dell's Willful Infringement

260. Dell is willfully infringing at least claim 1 of the '818 patent. Dell's offers for sale, sales, and uses of the Accused Products with provision of manuals and instruction to purchasers that encourage use it knows will infringe the '818 patent demonstrates the willful nature of Dell's infringement.

261. On information and belief, as alleged above, Dell's intellectual property department performs freedom-to-operate analyses and has a substantial head count and resources.

262. On information and belief, given job descriptions for Dell's attorneys involving procedures for performing freedom-to-operate analyses, given Dell's substantial intellectual property department, and given Dell's knowledge of the '688 patent and the related '818 patent since before the filing of this Complaint, if Dell did not investigate whether the Accused Products infringe the '818 patent, then Dell was willfully blind to a reasonable likelihood that the Accused Products infringe the '818 patent.

263. The foregoing description of Dell's infringement is based on publicly available information. LiTL reserves the right to modify this description, including, for example, on the basis of information about the Accused Products that it obtains during discovery.

264. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Dell's infringement of the '818 patent.

265. Dell's infringement of the '818 patent has damaged and continues to damage LiTL in an amount yet to be determined, of no less than a reasonable royalty.

COUNT VIII

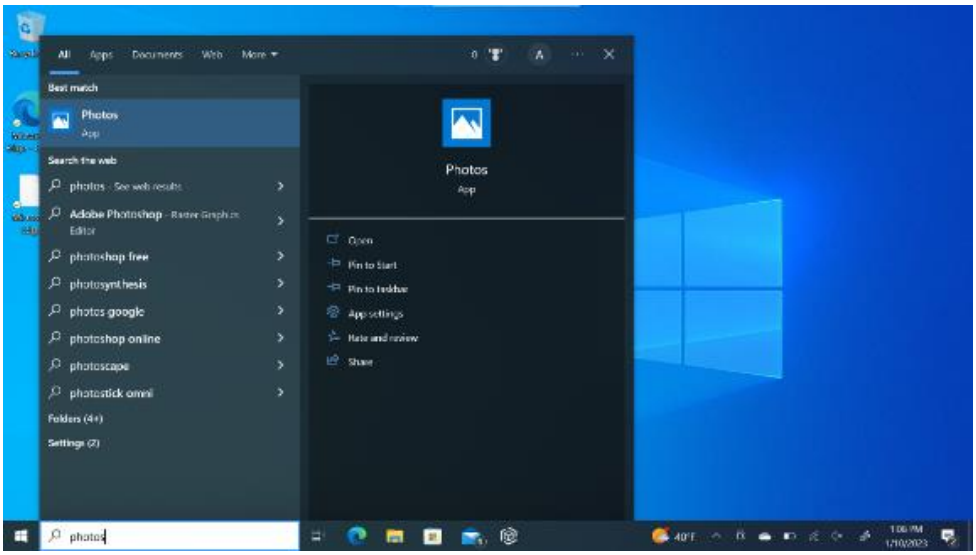
(Infringement of U.S. Patent No. 8,612,888)

266. LiTL incorporates by reference and realleges all the foregoing paragraphs of this Complaint as if fully set forth herein.

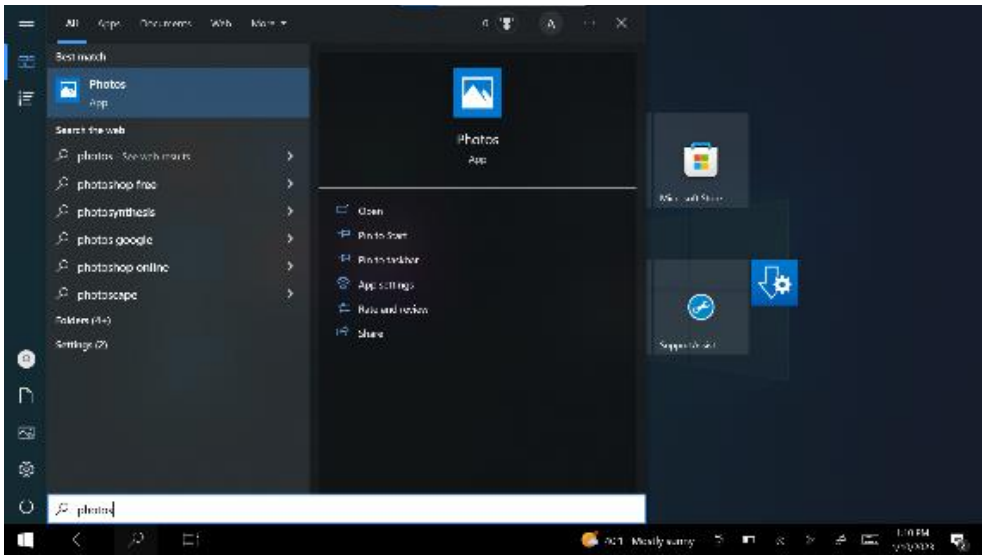
Dell's Direct Infringement

267. Dell has directly infringed and continues to directly infringe, literally and/or equivalently, one or more of the claims of the '888 patent, including at least claim 27, including by importing, using, selling, and offering for sale in the United States the Accused Products.

268. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a system for accessing and managing digital media libraries with a plurality of selectable I/O profiles. For example, the Latitude 5330 2-in-1 includes the Microsoft Photos app, which can be accessed in a first and second view:

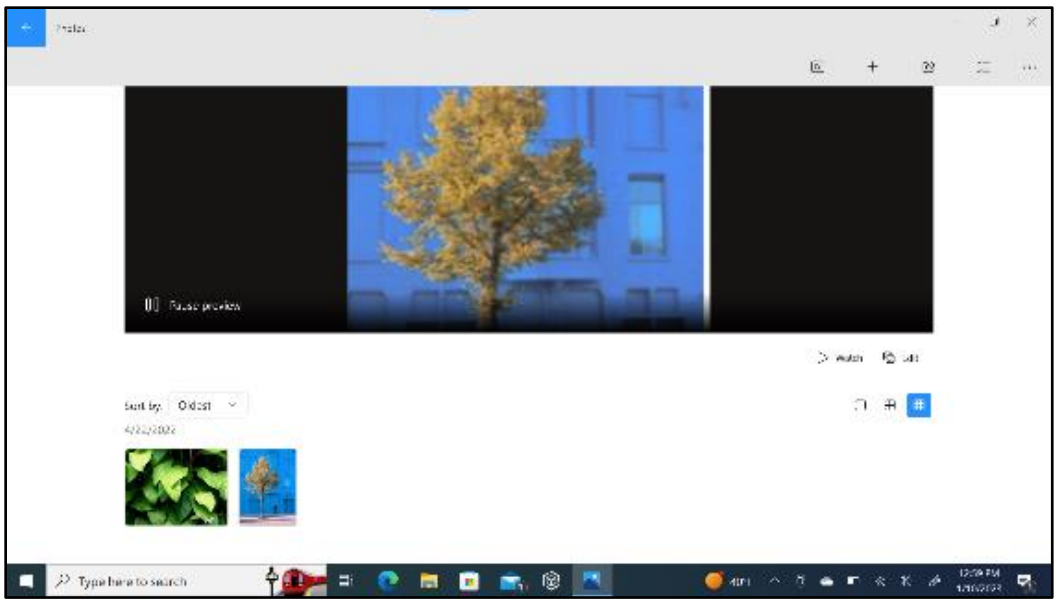


Microsoft Photos app in a first I/O profile

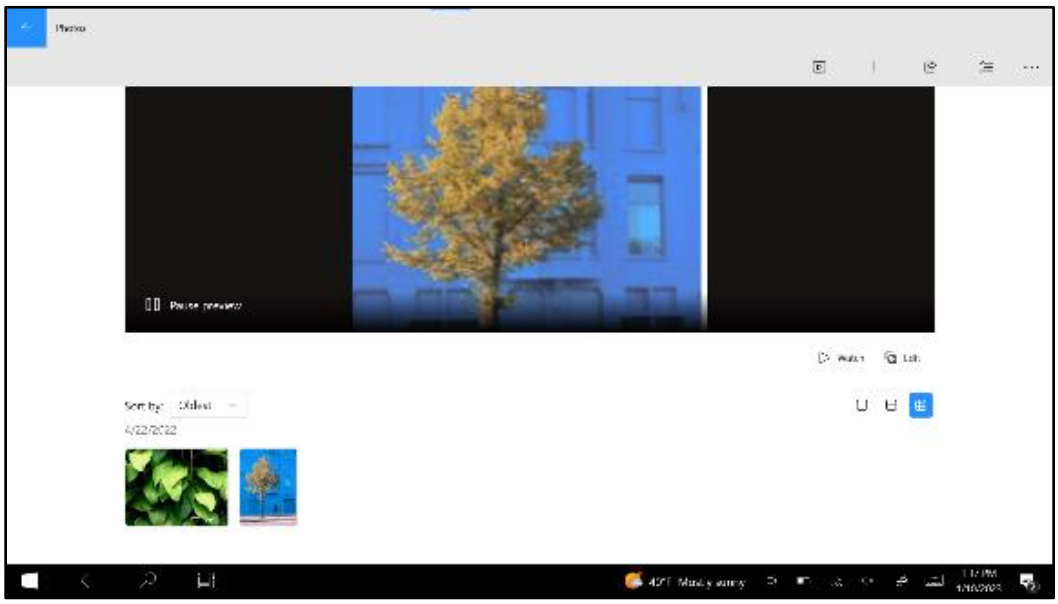


Microsoft Photos app in a second I/O profile

269. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display component configured to display a graphical user interface on a computing device, wherein the graphical user interface comprises at least a plurality of views of digital media content, wherein the plurality of views include at least one of a plurality of visual representations. For example, the Latitude 5330 2-in-1 includes a laptop mode and a tablet mode, and a different view associated with each of the different I/O profiles, and each of these views has a plurality of visual representations of digital content:



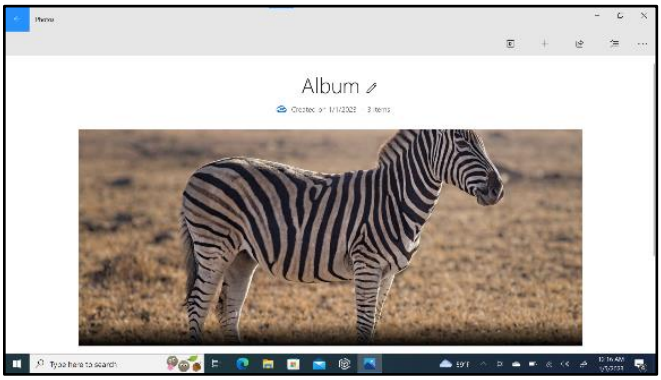
Microsoft Photos app in a first I/O profile with a first view



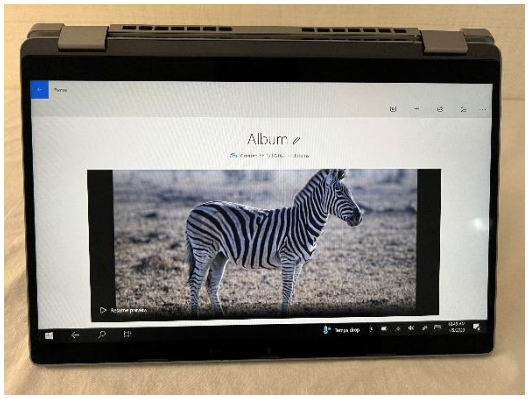
Microsoft Photos app in a second I/O profile with a second view

270. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an execution component configured to transition the graphical user interface between the plurality of views in response to selection of an I/O profile. For example, the Latitude 5330 2-in-1 is configured to transition between a plurality of views in response to selection of laptop and tablet modes:

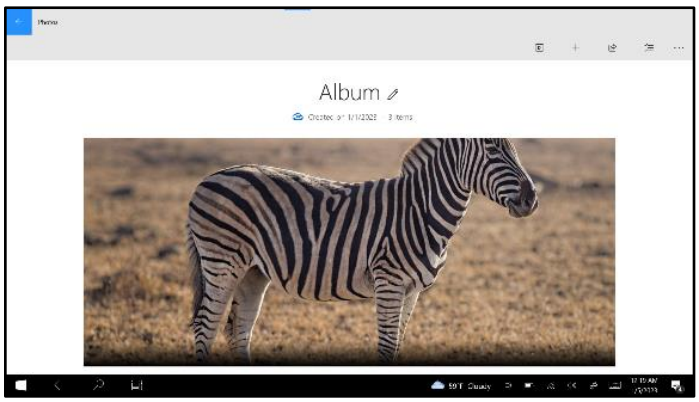
First physical configuration



First I/O profile with a first view



Second physical configuration



Second I/O profile with a second view

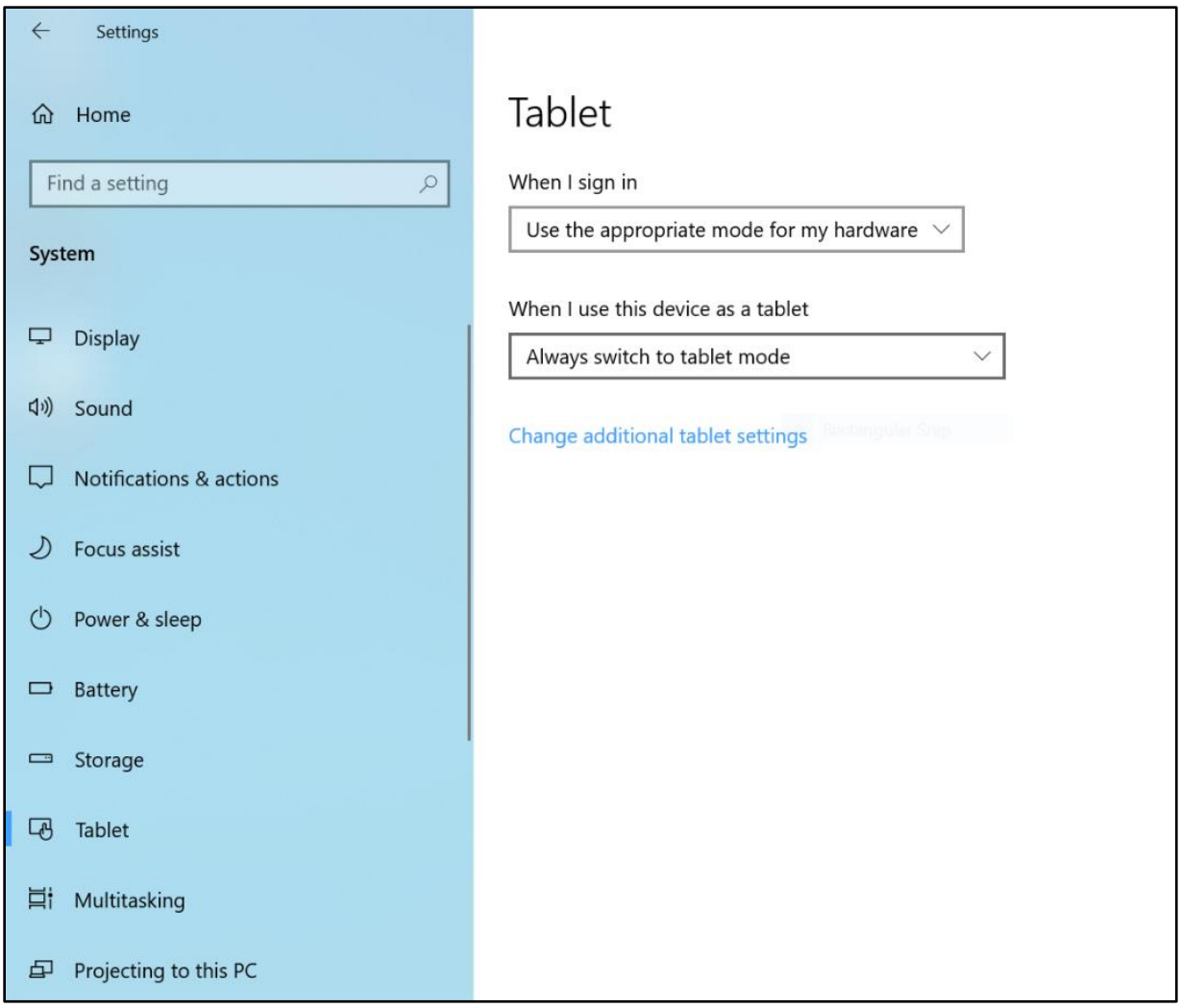
271. Selecting the I/O profile within the Accused Products (*e.g.*, the Latitude 5330 2-in-1) includes responding to user rotation of a display component of the computing device about a longitudinal axis running along an interface between the display component and a base of the streamlined computing device; responding to rotation of the display component about the longitudinal from a closed mode to a first physical orientation configures the computing device into a laptop mode having a first physical configuration of the display component and the base with one of the plurality of views as a default display; and responding to rotation of the display component about the longitudinal axis from the closed mode to a second physical orientation configures the computing device into another display mode having a second physical configuration of the display component and the base with

another one of the plurality of views as the default display. For example, the Latitude 5330 2-in-1 can display a laptop mode when rotated from a closed mode to a notebook mode, and can further display a tablet mode when rotated from a notebook mode to an easel mode.

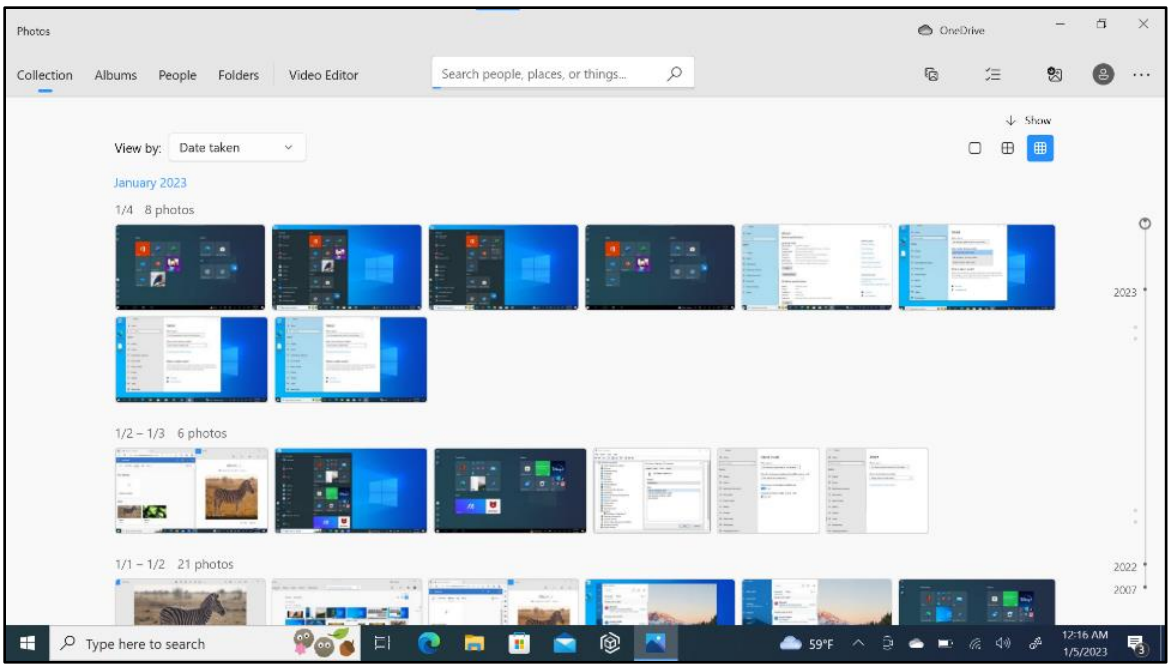
First physical configuration with a first view

Second physical configuration with a second view

272. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a view selector component configured to transition between the plurality of views in response to activation. For example:

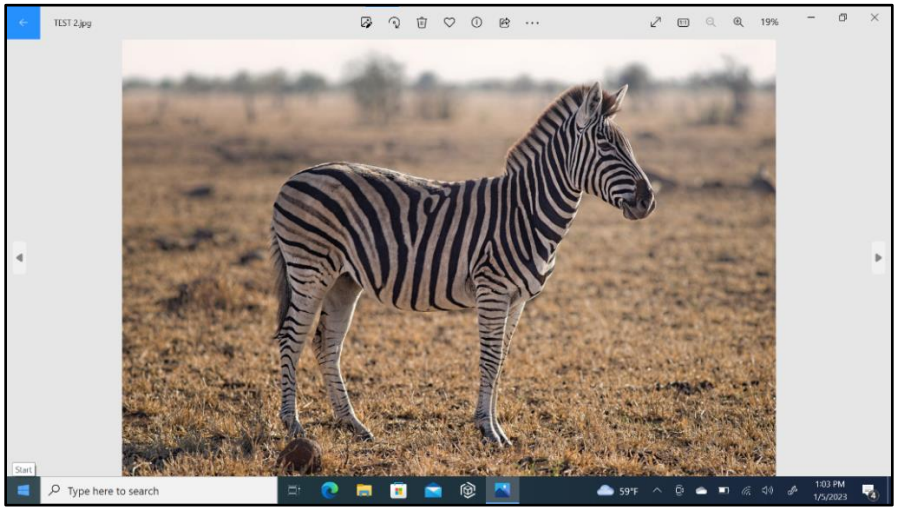


273. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a storage component configured to store an association between at least one of a plurality of visual representations and digital media content. For example, the Latitude 5330 2-in-1 includes the Microsoft Photos app, which is configured to store an association between thumbnail previews of content and digital media content:



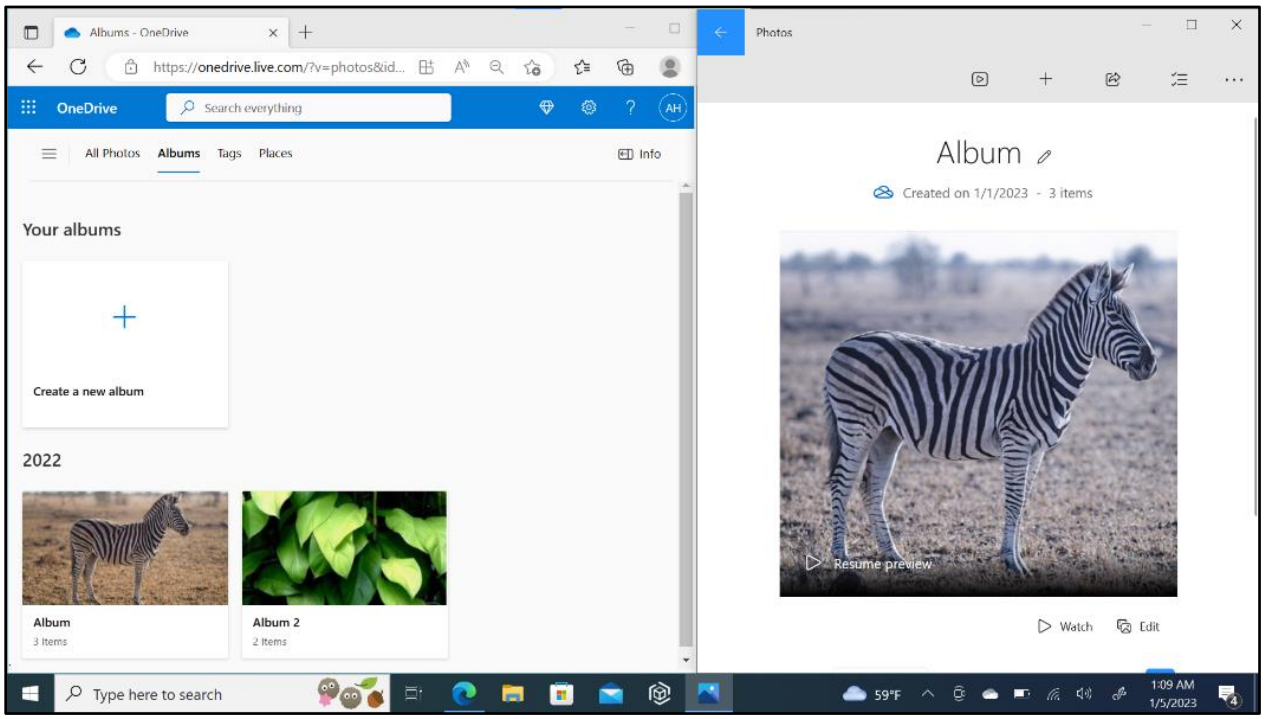
Microsoft Photos app

274. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include an execution component further configured to execute the association with the at least one of the plurality of visual representations with digital media content in response to selection and transition the display to a view of the digital media content in response to the act of executing the association. For example, selecting a thumbnail preview in the Microsoft Photos app transitions to a view of the digital media content:



Digital media content in Microsoft Photos app

275. The Accused Products (*e.g.*, the Latitude 5330 2-in-1) include a display component configured to display user digital media content and referenced digital media content in the view of the digital media content. For example, the Latitude 5330 2-in-1 includes the Microsoft Photos app, which is configured to permit users to manage digital media content libraries (*e.g.*, in an album located locally or in a remote location such as OneDrive):



OneDrive album in Microsoft Photos app

Dell's Knowledge of the '888 Patent

276. Since at least the filing of this Complaint, Dell knows of the '888 patent.

277. On information and belief, Dell's knowledge of the '688 patent by at least 2013 would have caused Dell to investigate, become aware of, and consider LiTL's related patents, including the '888 patent, before the filing of this Complaint.

Dell's Induced Infringement

278. Since at least the filing of this Complaint, Dell knows that the Accused Products infringe at least claim 27 of the '888 patent when used by customers or other users, when imported by others, and when sold or offered for sale by Dell Inc. and resellers such as Best Buy.

279. Since at least the filing of this Complaint, Dell Technologies Inc. induces infringement by actively encouraging Dell Inc. to directly infringe at least claim 27 of the '888 patent by facilitating Dell Inc.'s sales, offers for sale, and use of the Accused Products.

280. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging resellers to directly infringe at least claim 27 of the '888 patent by facilitating resellers' sales and offers for sale of the Accused Products and by having the Accused Products manufactured and imported. On information and belief, Dell resellers include Best Buy. https://www.dell.com/en-us/lp/reseller_store_locator

281. Since at least the filing of this Complaint, Dell Inc. induces infringement by actively encouraging customers or other users to directly infringe at least claim 27 of the '888 patent. Dell Inc. has provided with the Accused Products and on Dell's website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 27 of the '888 patent. For example, Dell's website touts the availability of four display modes on its Latitude, Inspiron, and XPS 2-in-1 notebooks. *E.g.*, https://dl.dell.com/content/manual29903967-latitude-5330-latitude-5330-2in1-setup-and-specifications.pdf (pp. 10-12); https://dl.dell.com/topicspdf/inspiron-13-7391-2-in-1-laptop_users-guide_en-us.pdf (pp. 9-10); and https://dl.dell.com/topicspdf/xps-13-7390-2-in-1-laptop_setup-guide_en-us.pdf (pp. 9-10).

Dell's Willful Infringement

282. Dell is willfully infringing at least claim 27 of the '888 patent. Dell's offers for sale, sales, and uses of the Accused Products with provision of manuals and instruction to purchasers that encourage use it knows will infringe the '888 patent demonstrates the willful nature of Dell's infringement.

283. On information and belief, as alleged above, Dell's intellectual property department performs freedom-to-operate analyses and has a substantial head count and resources.

284. On information and belief, given job descriptions for Dell's attorneys involving procedures for performing freedom-to-operate analyses, given Dell's substantial intellectual property department, and given Dell's knowledge of the '688 patent and the related '888 patent since before the filing of this Complaint, if Dell did not investigate whether the Accused Products infringe the '888 patent, then Dell was willfully blind to a reasonable likelihood that the Accused Products infringe the '888 patent.

285. The foregoing description of Dell's infringement is based on publicly available information. LiTL reserves the right to modify this description, including, for example, on the basis of information about the Accused Products that it obtains during discovery.

286. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Dell's infringement of the '888 patent.

287. Dell's infringement of the '888 patent has damaged and continues to damage LiTL in an amount yet to be determined, of no less than a reasonable royalty.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff LiTL respectfully requests that this Court enter judgment as follows:

a. Declaring that Dell has infringed the ’688, ’844, ’229, ’154, ’315, ’715, ’818, and ’888 patents;

b. Granting a permanent injunction, enjoining Dell and its officers, agents, employees, attorneys, and all other persons acting in concert or participation with them, from further infringement of the ’688, ’844, ’229, ’154, ’315, ’715, ’818, and ’888 patents, including but not limited to the enjoining the manufacture, sale, offer for sale, importation or use of the Accused Products and any further development of the Accused Products;

c. Awarding LiTL damages adequate to compensate it for Dell’s infringing activities, including supplemental damages for any post-verdict infringement up until entry of the final judgment with an accounting as needed, together with pre-judgment and post-judgment interest on the damages awarded;

d. Finding Dell’s infringement to be willful and awarding enhanced damages in an amount up to treble the amount of compensatory damages as justified under 35 U.S.C. § 284;

e. Finding this to be an exceptional case and awarding LiTL its attorneys’ fees and costs under 35 U.S.C. § 285 as a result of Dell’s willful infringement of the asserted patents; and

f. Awarding LiTL any such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

LiTL hereby demands a trial by jury on all issues so triable.

Date: February 1, 2023

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Adam W. Poff

Adam W. Poff (#3990)
Robert M. Vrana (#5666)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
apoff@ycst.com
rvrana@ycst.com

Counsel for LiTL LLC

OF COUNSEL:

Michael A. Albert
Eric J. Rutt
Gerald B. Hrycyszyn
Marie A. McKiernan
Suresh S. Rav
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
617.646.8000 Phone
617.646.8646 Fax