

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LITL LLC,

Plaintiff,

v.

LENOVO (UNITED STATES), INC. and
LENOVO (BEIJING) LTD.

Defendants.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff LiTL LLC (“LiTL”) brings this action for patent infringement against Defendants Lenovo (United States), Inc. and Lenovo (Beijing) Ltd. (collectively “Lenovo”).

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, have induced and continue to induce the infringement of, and have contributed to and continue to contribute to the infringement of one or more claims of U.S. Patent Nos. 8,289,688 (“the ’688 patent”); 8,624,844 (“the ’844 patent”); 10,289,154 (“the ’154 patent”); 9,880,715 (“the ’715 patent”); 8,612,888 (“the ’888 patent”); and 8,577,957 (“the ’957 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

Trademark Office (“USPTO”). LiTL seeks monetary damages and injunctive relief to address 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 Lenovo (United States), Inc. (“Lenovo US”) is a corporation organized under the laws of the State of Delaware, with its principal place of business at 1009 Think Place, Building One, Morrisville, North Carolina 27560. Lenovo US is a wholly-owned, indirect subsidiary of Lenovo Group, the ultimate parent corporation.

6. Defendant Lenovo (Beijing) Ltd. (“Lenovo Beijing”) is a company organized under the laws of the People’s Republic of China, with its principal place of business at No. 6 Chuang Ye Road, Shangdi Information Industry Base, Haidan District, Beijing, China. Lenovo Beijing is a wholly-owned subsidiary of Lenovo Group.

JURISDICTION AND VENUE

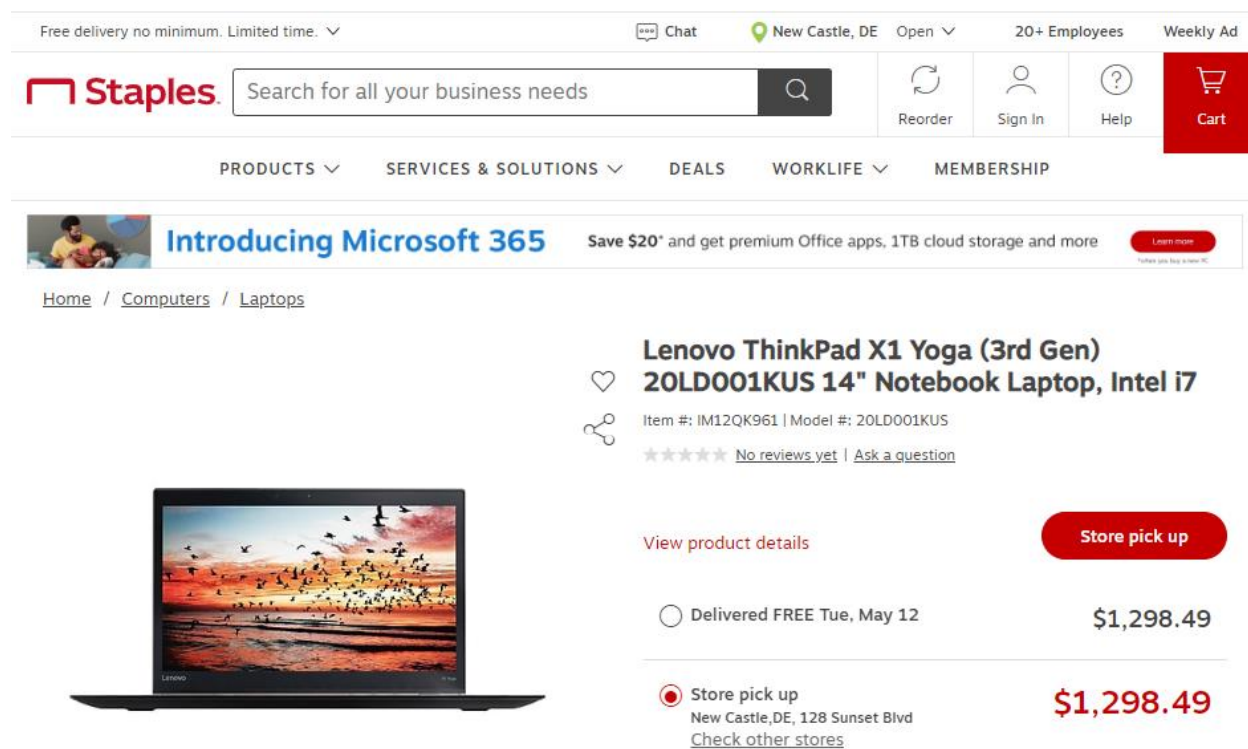
7. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. Defendants are subject to this Court’s personal jurisdiction. Lenovo US is incorporated in this District. Upon information and belief, Defendants have continuous and systematic business contacts with the State of Delaware. Upon information and belief, Defendants, directly and through subsidiaries and intermediaries (including distributors, retailers, and others) have purposefully and voluntarily placed the Accused Products (defined below) into this District and into the stream of commerce with the intention and expectation that they will be

purchased and used by consumers in this District. Upon information and belief, Defendants have offered and sold and continue to offer and sell these infringing products in this District.

9. Lenovo's website states that, in addition to being available for purchase on www.lenovo.com, Lenovo products are available for purchase from retailers including Best Buy, Costco, Office Depot, Staples and Walmart, each of which has locations in Delaware. <https://www.lenovo.com/us/en/landingpage/reseller-locator/>

10. Staples offers for sale the 3rd Generation ThinkPad X1 Yoga, an Accused Product, which can be picked up in a Staples store located in New Castle, Delaware, as depicted in the screenshot of Staples' website below.



11. A Best Buy located at Christiana Fashion Center in Newark, Delaware offers for sale the following Accused Devices: Yoga C740 (15 inch); Yoga C940 (14 inch); Yoga C740 (14 inch); ThinkPad L13 Yoga (13 inch); Yoga C940 (15 inch), as depicted in the screenshot of Best Buy's website below.

[Credit Cards](#)
[Top Deals](#)
[Deal of the Day](#)
[Gift Cards](#)
[Gift Ideas](#)
[For Your Business](#)

[Christiana](#)
[Cart](#)

[Products](#)
[Brands](#)
[Deals](#)
[Services](#)

[Account](#)
[Recently Viewed](#)
[Order Status](#)
[Saved Items](#)

Important Update: We have new safety measures for getting your order. [Learn more](#) | [Updates from Best Buy](#)

[Best Buy](#) > [Name Brands](#) > [Lenovo](#)

2-in-1 Design Lenovo Laptops

Get it fast

Store Pickup at [Christiana](#)

☒ Pick up today

Category

PC Laptops

Features

☒ 2-in-1 Design

☐ Touch Screen

☐ Webcam Built-in

☐ Backlit Keyboard

☐ Bluetooth Enabled

☐ Numeric Keypad

☐ Headphone Jack

☐ HDMI Output

[Show More](#)

Processor Model

☐ Intel Core i5

☐ Intel Core i7

Screen Size

☐ 12" - 14"

☐ 14" - 15"

☐ 15" - 16"

Condition

☐ New

☐ Open-Box

RAM

5 items

Sort By: [Best Selling](#)

Filters: [2-in-1 Design](#) [Clear all](#)

See More Options

Amazon Alexa built in

Lenovo - Yoga C740 2-in-1 15.6" Touch-Screen Laptop - Intel Core i5 - 12GB Memory - 256GB Solid State Drive - Iron Gray

Model: 81TD0003US SKU: 6367803

★★★★★ (251)

Pick up in 1 hour at Christiana

[Check all stores](#)

☐ Compare ☐ Save

Price Match Guarantee

\$749.99

Save \$100 Was \$849.99

[Add to Cart](#)

Open-Box: from \$689.99

[Help](#)

See More Options

Lenovo - Yoga C940 2-in-1 14" 4K Ultra HD Touch-Screen Laptop - Intel Core i7 - 16GB Memory - 512GB SSD - 32GB Optane - Mica

Model: 81Q80041US SKU: 6369421

★★★★★ (137)

Pick up in 1 hour at Christiana

[Check all stores](#)

☐ Compare ☐ Save

Price Match Guarantee

\$1,399.99

Save \$200 Was \$1,599.99

[Add to Cart](#)

Open-Box: from \$1,119.99

See More Options

Lenovo - Yoga C740 2-in-1 14" Touch-Screen Laptop - Intel Core i5 - 8GB Memory - 256GB Solid State Drive - Mica

Model: 81TC000JUS SKU: 6367805

★★★★★ (311)

Pick up in 1 hour at Christiana

[Check all stores](#)

☐ Compare ☐ Save

Price Match Guarantee

\$799.99

Price Drop

Save \$100 Was \$899.99

[Add to Cart](#)

Open-Box: from \$735.99

See More Options

Lenovo - ThinkPad L13 Yoga 2-in-1 13.3" Touch-Screen Laptop - Intel Core i5 - 8GB Memory - 256GB SSD - Black

Model: 20R5A000US SKU: 6383283

★★★★★ (23)

Pick up in 1 hour at Christiana

[Check all stores](#)

☐ Compare ☐ Save

Price Match Guarantee

\$899.99

[Add to Cart](#)

Open-Box: from \$737.99

[Help](#)

See More Options

Amazon Alexa built in

Lenovo - Yoga C940 2-in-1 15.6" Touch-Screen Laptop - Intel Core i7 - 16GB Memory - NVIDIA GeForce GTX 1650 - 512GB SSD - Iron Gray

Model: 81TE0000US SKU: 6367793

★★★★★ (66)

Pick up in 1 hour at Christiana

[Check all stores](#)

☐ Compare ☐ Save

Price Match Guarantee

\$1,699.99

[Add to Cart](#)

Open-Box: from \$1,529.99

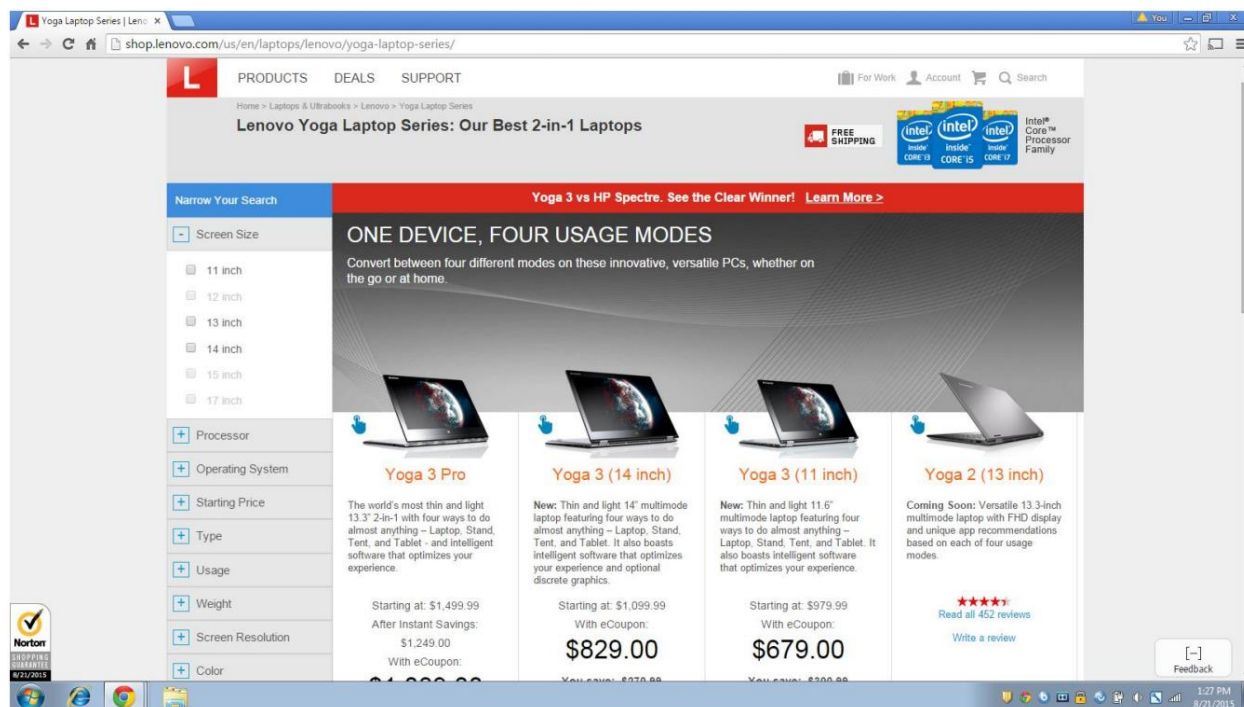
12. Lenovo Beijing owns the Lenovo.com domain, where the Accused Products (defined below) are offered for sale and sold throughout the United States, including within Delaware.

13. Lenovo Beijing owns numerous trademark registrations that Lenovo Beijing uses in connection with sales and offers for sale of the Accused Products within the United States.

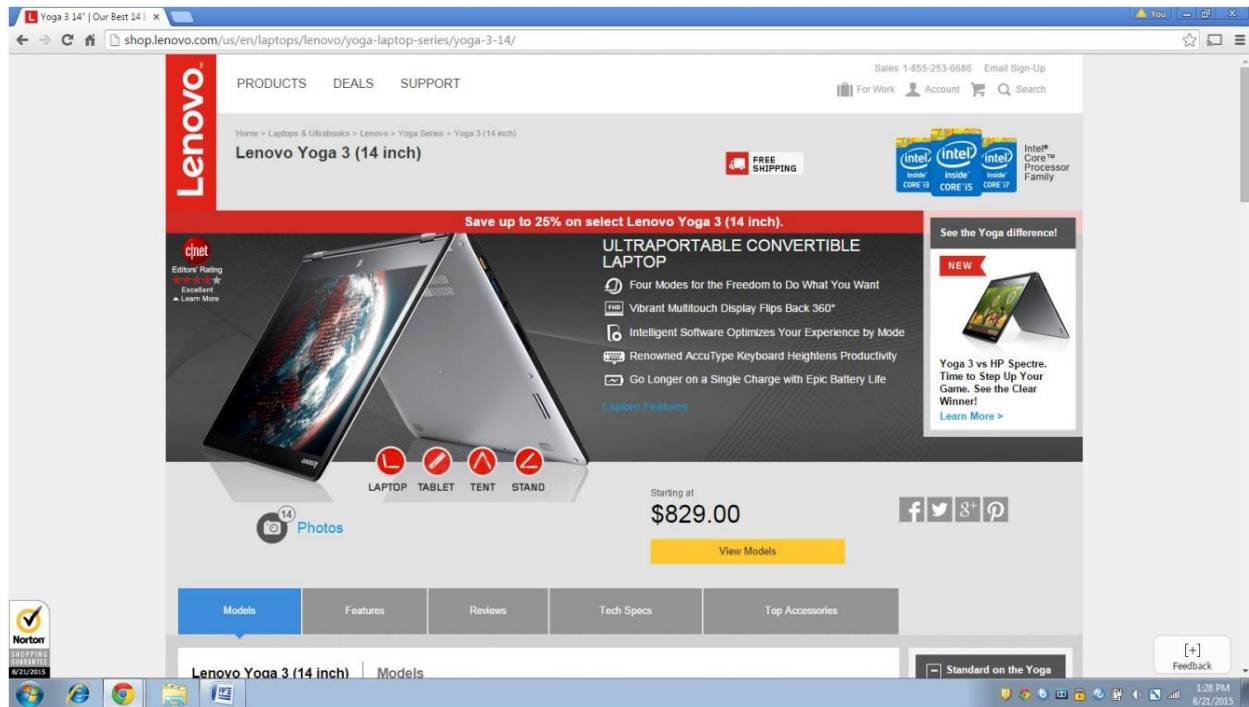
14. Lenovo Beijing owns U.S. Registration No. 4,822,390 to the mark YOGA for goods that include “portable computers.” When prosecuting the application that matured into the YOGA registration, the applicant Lenovo Beijing filed a Statement of Use on August 21, 2015, which included the statement: “The mark was first used by the applicant, or the applicant’s related company, licensee, or predecessor in interest at least as early as 10/00/2012, and first used in commerce at least as early as 10/00/2012, and is now in use in such commerce. The applicant is submitting one specimen for the class showing the mark as used in commerce on or in connection with any item in the class, consisting of a(n) Screen-shots of Applicant’s website showing sale of the products.” Lenovo Beijing submitted to the Trademark Office the two screenshots reproduced below.

<http://tsdr.uspto.gov/documentviewer?caseId=sn85585622&docId=SOU20150824165248#docIndex=4&page=1>

15. The first screenshot submitted by Lenovo Beijing shows the website shop.lenovo.com/us/en/laptops/lenovo/yoga-laptop-series, which touts the four usage modes of the Yoga 3 Pro, Yoga 3 (14 inch), Yoga 3 (11 inch) and Yoga 2 (13 inch), each of which are included in the Accused Products defined below:



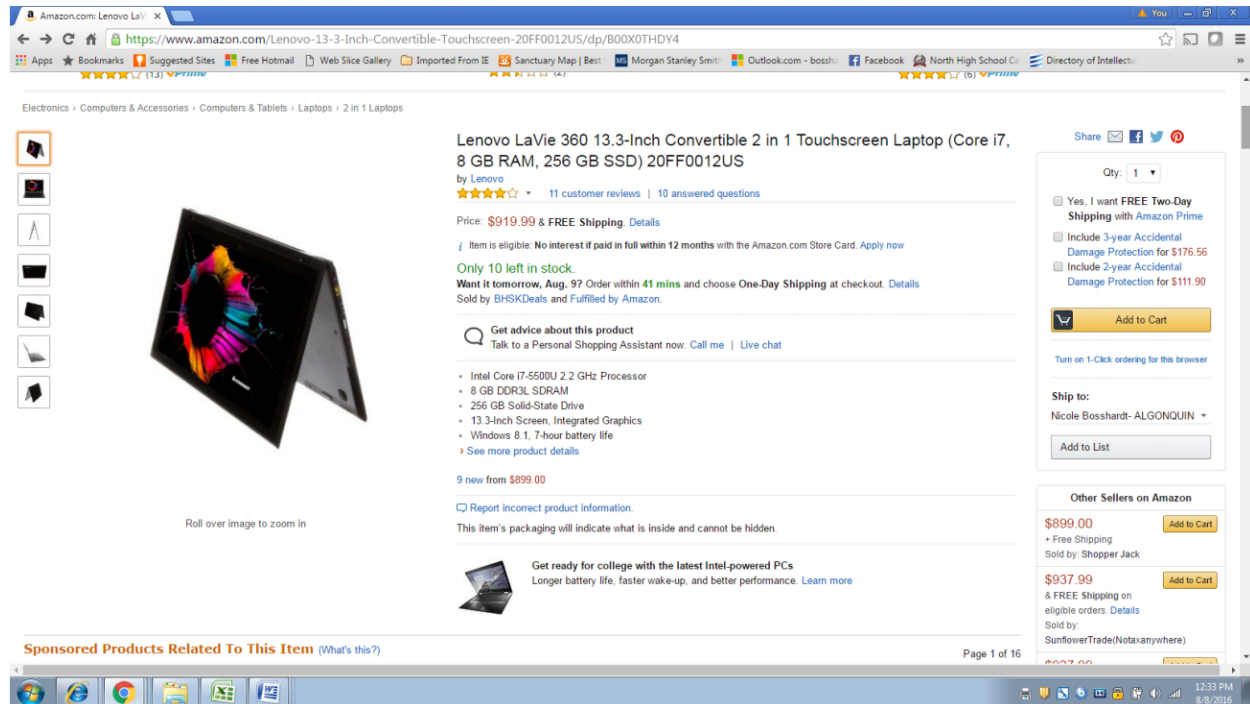
16. The second screenshot submitted by Lenovo Beijing shows the website shop.lenovo.com/us/en/laptops/lenovo/yoga-3-14, which offers to sell the Yoga 3 (14 inch) for \$829.00 and includes "Free Shipping." The website touts "Four Modes for the Freedom to Do What You Want" and lists "Laptop," "Tablet," "Tent" and "Stand" beneath an image of the Lenovo Yoga 3 operating in tent mode:



17. The Statement of Use submitted by Lenovo Beijing included a declaration that stated that “the applicant is the owner of the mark sought to be registered; the mark is in use in commerce; for a trademark or service mark application, the applicant is using the mark in commerce on or in connection with all the goods/services in the application or notice of allowance.”

18. On March 4, 2015, Lenovo Beijing submitted an application for U.S. Serial No. 86553493 to the mark LENOVO LAVIE for goods that include “laptop computers.” On August 9, 2016, applicant Lenovo Beijing submitted a Statement of Use, which included the statement: “The mark was first used by the applicant, or the applicant’s related company, licensee, or predecessor in interest at least as early as 05/00/2015, and first used in commerce at least as early as 05/00/2015, and is now in use in such commerce. The applicant is submitting one specimen for the class showing the mark as used in commerce on or in connection with any item in the class, consisting of a(n) screen shot of websites showing product for sale.” Lenovo Beijing

submitted to the Trademark Office a screenshot of the website www.amazon.com/Lenovo-13-3-Inch-Convertible-Touchscreen-20FF0012US/dp/B00X0THDY4, which offers to sell for \$919.00 the Lenovo LaVie 360, which is included in the Accused Products defined below. The website includes an image of the Lenovo LaVie 360 operating in tent mode, and identifies Lenovo as the seller:



<http://tsdr.uspto.gov/documentviewer?caseId=sn86553493&docId=SOU20160810165541#docIndex=4&page=1>

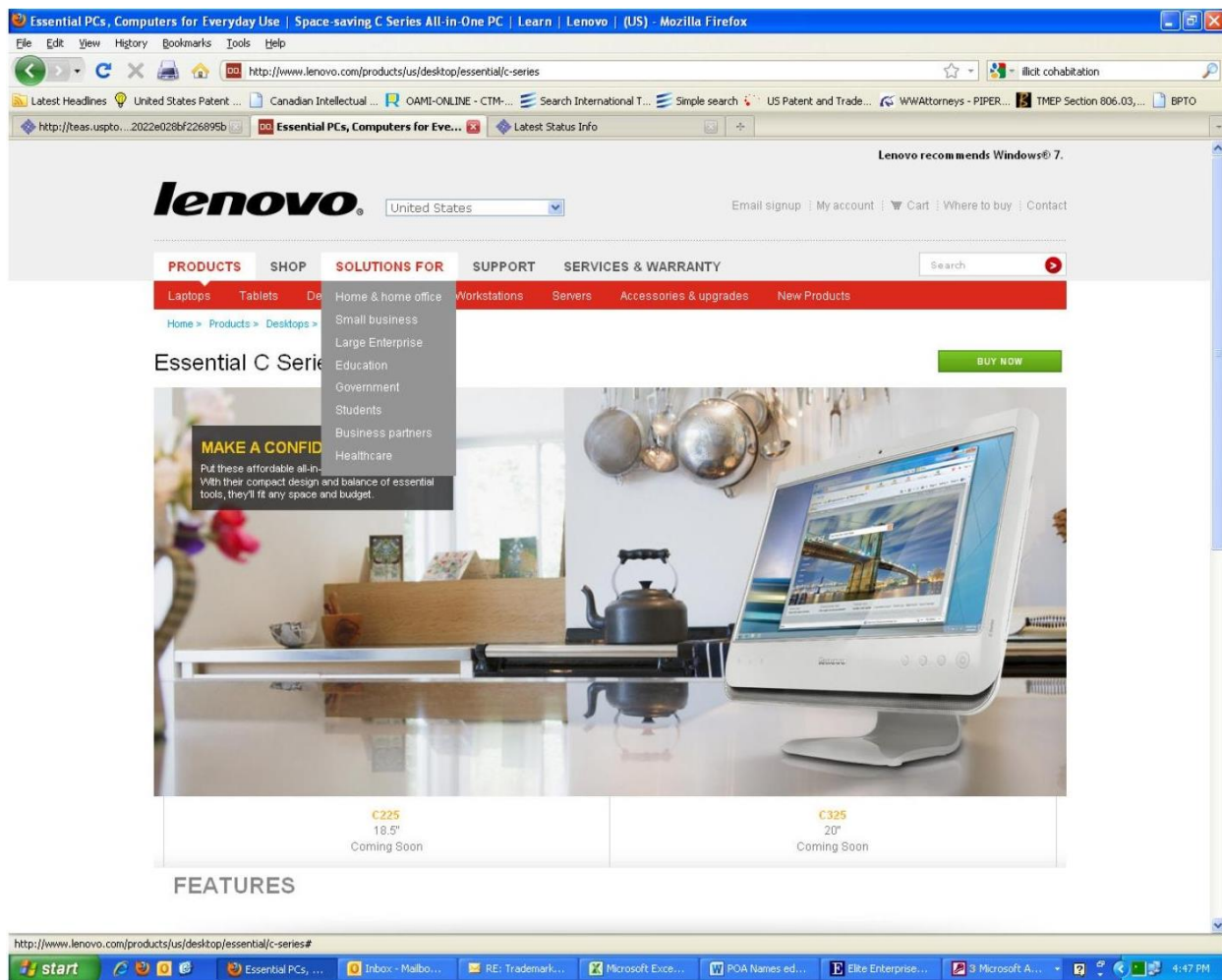
19. The Statement of Use submitted by Lenovo Beijing in connection with the LENOVO LAVIE mark included a declaration stating that “the applicant is the owner of the mark sought to be registered; the mark is in use in commerce; for a trademark or service mark application, the applicant is using the mark in commerce on or in connection with all the goods/services in the application or notice of allowance.”

20. Lenovo Beijing owns U.S. Registration No. 3,149,377 to the mark LENOVO for goods that include “computers” and “notebook computers” and for services that include “installation, maintenance and repair of computer hardware.”

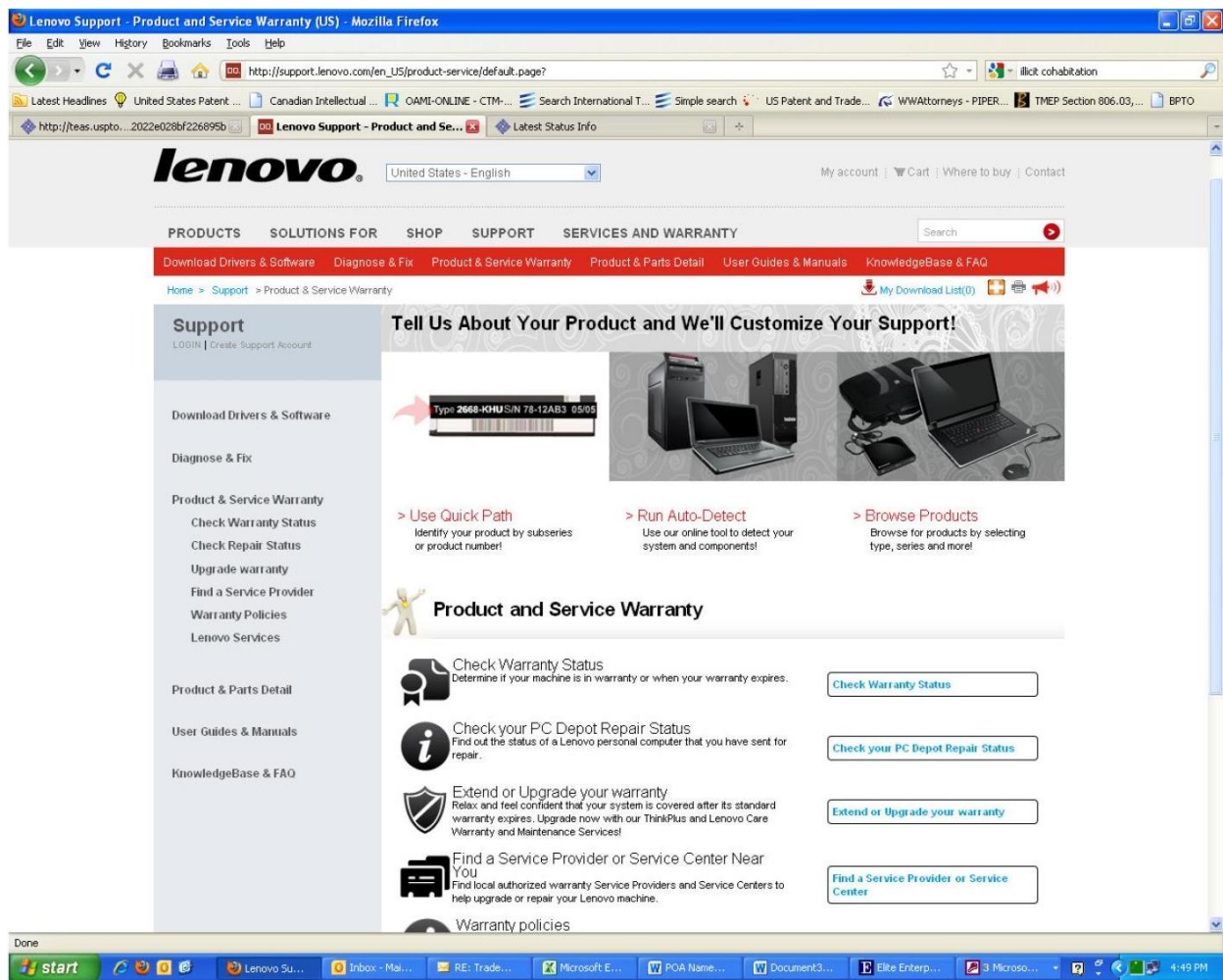
21. On October 13, 2011, Lenovo Beijing submitted a Declaration of Use that included the following declaration: “The mark is in use in commerce on or in connection with the goods and/or services identified above, as evidenced by the attached specimen(s) showing the mark as used in commerce.”

<http://tsdr.uspto.gov/documentviewer?caseId=sn78217242&docId=81520111014155540#docIndex=6&page=1>

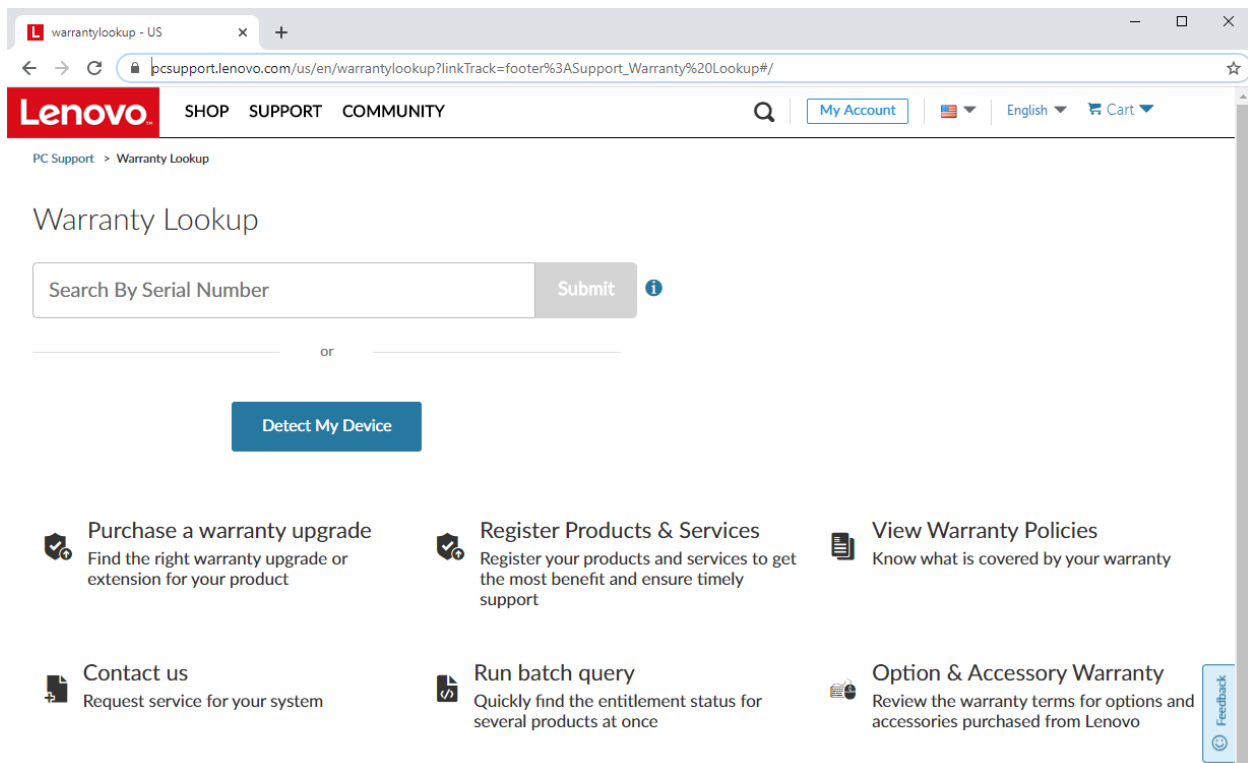
22. Lenovo Beijing submitted a specimen on October 13, 2011 that included a screenshot of its website, www.lenovo.com/products/us/desktop/essential/c-series, which advertised products to be offered for sale in the United States:



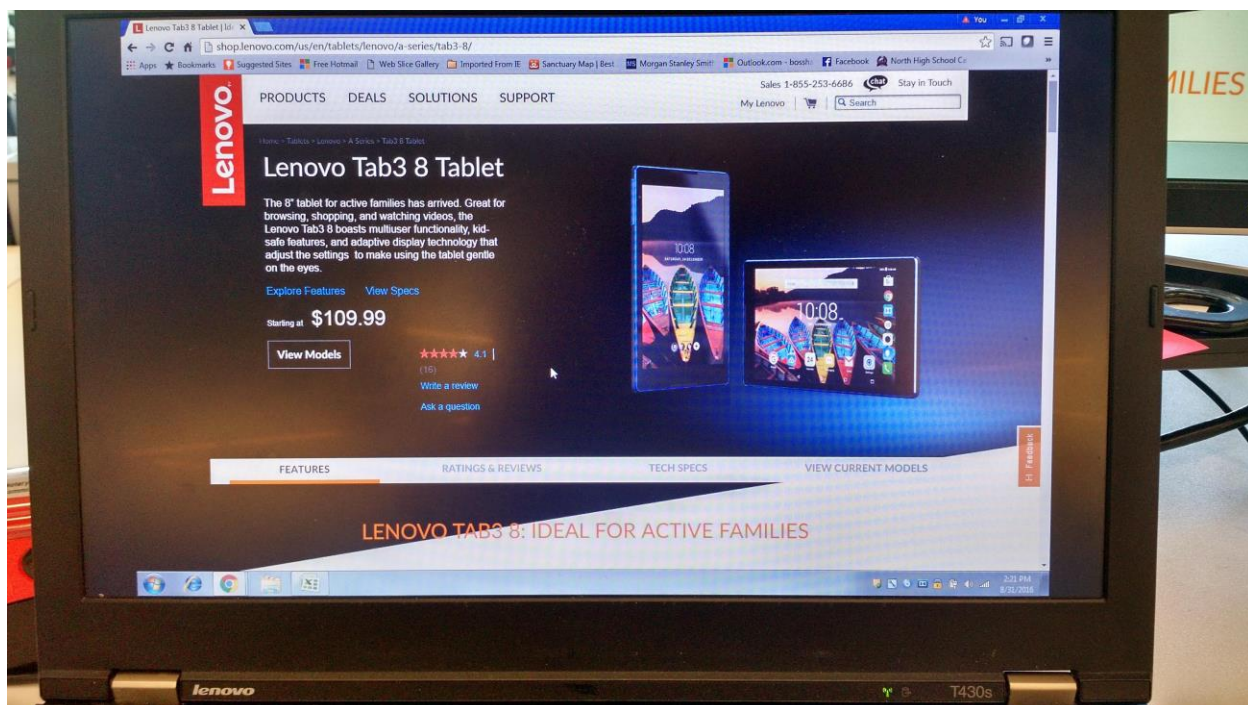
23. The specimen that Lenovo Beijing submitted on October 13, 2011 also included screenshots of its website, www.lenovo.com/en_US/product-service/default.page?, which allowed customers in the United States to check the status of their product and service warranty, upgrade their warranty, or access their warranty policies:



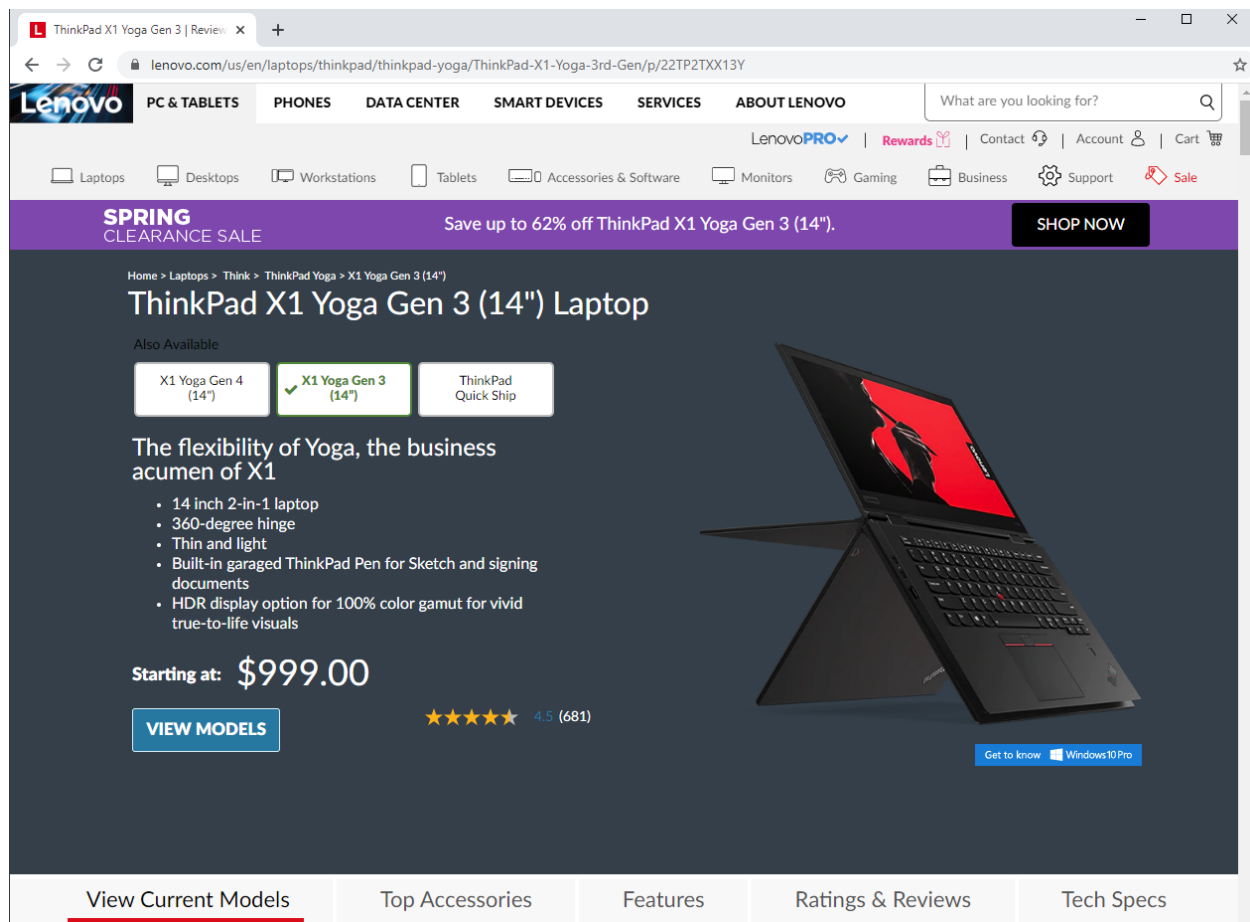
24. Lenovo Beijing continues to use the LENOVO mark on its website, which allows customers in the United States who have purchased the Accused Products to lookup their warranty, purchase a warranty upgrade, or view their warranty policies.



25. On August 31, 2016, Lenovo Beijing submitted a Declaration of Use that included a specimen in which the use of the LENOVO mark on Lenovo Beijing's website is visible, and is used in connection with an offer to sell a product within the United States.



26. Lenovo Beijing continues to use the LENOVO mark on its website in connection with offers to sell products within the United States, including each of the Accused Products (defined below). For example, Lenovo Beijing displays the LENOVO mark on its website in connection with its offer to sell to customers within the United States, including customers within Delaware, the 3rd Generation ThinkPad X1 Yoga, which is included in the Accused Products.



27. In May 2019, the president of Lenovo's North America Intelligent Devices Group, Matthew Zielinski, stated: "We took back the lead as the No. 1 PC company in the world. We hit a global market share of 24.6 percent [for the fourth quarter of 2018, according to IDC], which is 16 percent growth. ... Through calendar Q4 of last year, we were the fastest-growing PC

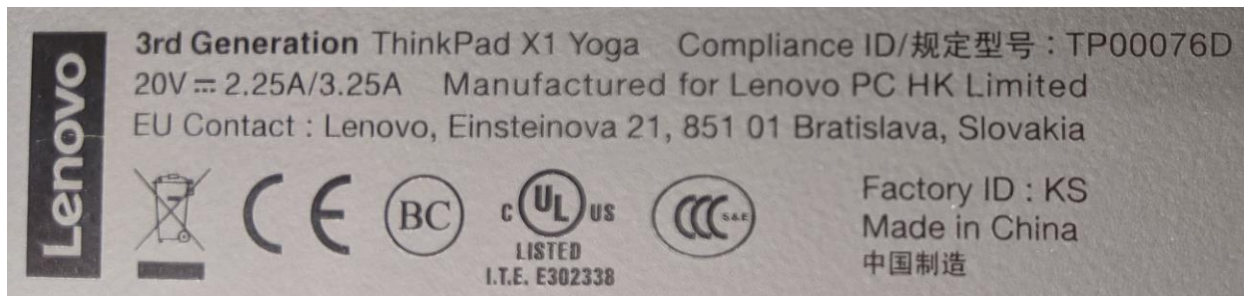
manufacturer in the largest five. Our shipments jumped 29 percent year to year, and in calendar Q4 we outgrew the market by 26 points—just some astounding growth numbers there. That is North America alone. Not only was it 26 percent year-on-year growth, but we were just way faster by a country mile relative to the competition. ... We're absolutely on fire, and I'm extraordinarily bullish on our plans for next year.” <https://www.crn.com/slide-shows/mobility/lenovo-s-matthew-zielinski-intelligent-devices-group-is-absolutely-on-fire>

Lenovo's 2019 Annual Report states that the PC and Smart Device (PCSD) Business, which is part of Lenovo's Intelligent Devices Group, had “a record revenue of US \$38,475 million for the fiscal year, representing approximately 75 percent of the Group's total revenue.” (2019 Annual Report, p. 18). The 2019 Annual Report stated that market share gain and revenue growth “were mainly driven by Asia Pacific (AP) and North America (NA).” (Id.) The Accused Products fall within Lenovo's PCSD Business. Given that Lenovo accounts for nearly a quarter of global market share for personal computers, given Lenovo's “astounding growth” in North America, given that the PCSD Business that supplies the Accused Products had over \$38 billion in revenues in 2019, and given the large number of devices in the Accused Products (defined below), upon information and belief customers in Delaware have purchased the Accused Products from Lenovo Beijing's website in the past six years.

28. Customers in the United States who purchase the Accused Products on Lenovo Beijing's website must accept the terms of a Sales Agreement when ordering online. <https://www.lenovo.com/us/en/legal/sales-agreement/> Upon information and belief, customers in Delaware have directly purchased the Accused Products from Lenovo Beijing's website, and have thereby entered into binding sales agreements with Lenovo. Customers within the United

States, including those in Delaware, can directly obtain customer support and access warranty information from Lenovo Beijing's website.

29. A 3rd Generation ThinkPad X1 Yoga, which is one of the Accused Products, was purchased in the United States from Lenovo Beijing's www.lenovo.com website. The underside of the device bears Lenovo Beijing's LENOVO mark.



30. Lenovo's 2019 Annual Report (page 283) states that the principal activities of Lenovo Beijing include manufacturing and distribution of IT products and provision of IT services. Lenovo Beijing's operation of the www.lenovo.com website, which has offered for sale and sold the Accused Products to customers within the United States, and Lenovo Beijing's use of the YOGA, LENOVO LAVIE and LENOVO marks in connection with such offers for sale and sales, demonstrates Lenovo Beijing's intent to serve the United States market. Nothing on the www.lenovo.com website indicates that Lenovo Beijing intended to exclude Delaware customers from purchasing the Accused Products from the Lenovo Beijing website. Accordingly, Lenovo Beijing is subject to the specific personal jurisdiction of the Court.

31. The Defendants have established minimum contacts with Delaware and availed themselves of the benefits of conducting activities in Delaware.

32. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Lenovo US is 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. Lenovo Beijing is not a resident in the United States and venue lies in any judicial district pursuant to 28 U.S.C. § 1391(c)(3).

FACTUAL BACKGROUND

LiTL's Patented Technologies

33. 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.

34. 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>

35. 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>

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



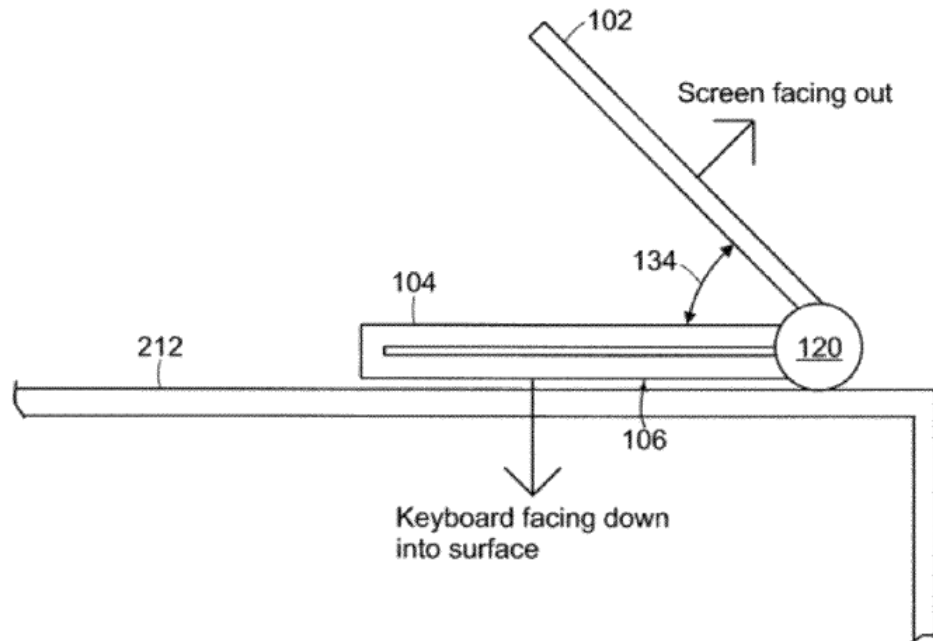
<http://web.archive.org/web/20091201114605/http://www.litl.com/easy-to-use/intuitive-interface.htm>

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



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

38. 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.

39. 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>

40. LiTL’s continuing investment in innovation has produced a portfolio that includes over 20 patents in the United States and other countries across the globe.

LiTL’s Asserted Patents

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

42. 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.

43. 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.

44. 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 C.

45. 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 D.

46. 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 E.

47. LiTL is the current owner by assignment of the entire right, title and interest in and to the '957 patent titled "System and method for streamlining user interaction with electronic content." The '957 patent was duly and legally issued on November 5, 2013. The patent is generally directed to streamlined computer devices configured to perform a remote access operation. A copy of the '957 patent is attached as Exhibit F.

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

48. 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.

49. The infringing products include, but are not limited to, IdeaPad Yoga 13; IdeaPad Yoga 11S; Flex 2 (14 inch); Flex 2 (15 inch); Flex 3 (11 inch); Flex 3 (14 inch); Flex 3 (15 inch); Flex 4 (11 inch); Flex 4 (14 inch); Flex 4 (15 inch); Flex 5 (14 inch); Flex 5 (15 inch); Flex 6 (11 inch); Flex 6 (14 inch); Flex 10; Flex 14; Flex 14D; Flex 15; Flex 15D; Edge 15; Edge 2; Yoga 2 (11 inch); Yoga 2 (13 inch); Yoga 2 Pro; Yoga 3 (11 inch); Yoga 3 (14 inch); Yoga 3 Pro; Yoga 260; Yoga 300; Yoga 460; Yoga 500 (14 inch); Yoga 500 (15 inch); Yoga 510 (14 inch); Yoga 510 (15 inch); Yoga 520; Yoga 530; Yoga 700 (11 inch); Yoga 700 (14 inch); Yoga 710 (11 inch); Yoga 710 (14 inch); Yoga 710 (15 inch); Yoga 720 (12 inch); Yoga 720 (13 inch); Yoga 720 (15 inch); Yoga 730 (13 inch); Yoga 730 (15 inch); Yoga 900; Yoga 900S; Yoga 910; Yoga 920; Yoga Book with Windows; Yoga C630; Yoga C640; Yoga S730; Yoga C740 (14 inch); Yoga C740 (15 inch); Yoga S740 (14 inch); Yoga S740 (15 inch); Yoga C930; Yoga Book C930; Yoga C940 (14 inch); Yoga C940 (15 inch); Yoga Slim 7; Yoga P40; LaVie 360; 1st Generation ThinkPad Yoga 11e; 2nd Generation ThinkPad Yoga 11e; 3rd Generation ThinkPad Yoga 11e; 4th Generation ThinkPad Yoga 11e; 5th Generation ThinkPad Yoga 11e; ThinkPad Yoga 12; ThinkPad Yoga 14; ThinkPad Yoga 15; ThinkPad L380 Yoga; ThinkPad L390 Yoga; 1st Generation ThinkPad X1 Yoga; 2nd Generation ThinkPad X1 Yoga; 3rd Generation ThinkPad X1 Yoga; 4th Generation ThinkPad X1 Yoga; 5th Generation ThinkPad X1 Yoga; ThinkPad

Yoga X380; ThinkPad Yoga X390; ThinkPad L13 Yoga; Lenovo 300e Windows; Lenovo 300e Winbook; Lenovo N23 Winbook (“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.

50. The Accused Products are convertible devices, which are capable of being used in multiple modes, including laptop mode, tent mode, and stand mode. From 2012 through the present, Lenovo has touted in press releases the multi-mode capabilities of the following Accused Products:

- IdeaPad Yoga 13 (October 9, 2012): <https://news.lenovo.com/pressroom/press-releases/lenovo-premiers-yoga-and-debuts-family-of-convertible-devices-designed-for-windows-8/>
- Yoga 11S (May 16, 2013): <https://news.lenovo.com/pressroom/press-releases/lenovo-launches-yoga-11s-convertible/>
- Yoga 2 Pro, ThinkPad Yoga, Flex 14, Flex 15 (September 5, 2013): <https://news.lenovo.com/pressroom/press-releases/lenovo-expands-multimode-family-with-new-yoga-convertibles-and-flex-dual-mode-devices/>
- Yoga 2, Flex 14D, Flex 15D (January 6, 2014): <https://news.lenovo.com/pressroom/press-releases/lenovo-adds-more-convertibles-and-detachable-devices-to-multimode-computing-roster/>
- Flex 2 (April 16, 2014): <https://news.lenovo.com/pressroom/press-releases/lenovo-flexes-multimode-muscle-with-new-dual-mode-laptops/>

- Edge 15 (September 4, 2014): <https://news.lenovo.com/pressroom/press-releases/new-lenovo-devices-transform-to-fit-the-board-room-game-room-and-beyond/>
- Yoga 3 Pro (October 9, 2014): <https://news.lenovo.com/pressroom/press-releases/new-lenovo-ultra-slim-yoga-3-pro-adapts-to-users/>
- Flex 3 (January 5, 2015): <https://news.lenovo.com/pressroom/press-releases/lenovo-brings-consumers-new-choices-for-mobile-and-home-computing/>
- LaVie 360 (January 5, 2015): <https://news.lenovo.com/pressroom/press-releases/lenovo-and-necp-introduce-two-lighter-than-air-lavie-z-ultraportables/>
- ThinkPad Yoga, Yoga 3 (January 5, 2015): <https://news.lenovo.com/pressroom/press-releases/lenovo-yoga-family-takes-flexibility-and-interactivity-even-further-with-new-technologies/>
- ThinkPad Yoga 11e (January 21, 2015): <https://news.lenovo.com/pressroom/press-releases/lenovo-gets-back-to-school-with-new-thinkpad-11e-laptops-series/>
- Yoga 260, Yoga 460 (September 2, 2015): <https://news.lenovo.com/pressroom/press-releases/new-thinkpad-yoga-and-thinkcentre-tiny-transform-business-computing/>
- Yoga 900 (October 19, 2015): <https://news.lenovo.com/pressroom/press-releases/new-lenovo-yoga-windows-10-pcs-primed-for-portability/>
- Yoga 700 (October 29, 2015): <https://news.lenovo.com/pressroom/press-releases/new-lenovo-yoga-700-offers-more-options-for-performance-and-portability/>
- Yoga P40 (December 1, 2015): <https://news.lenovo.com/pressroom/press-releases/creativity-without-limits-performance-without-compromise-lenovo-unveils-the-thinkpad-p40-yoga/>

- ThinkPad X1 Yoga (January 3, 2016): <https://news.lenovo.com/pressroom/press-releases/lenovo-unveils-pioneering-modular-thinkpad-x1-tablet/>
- Yoga 900S (January 4, 2016): <https://news.lenovo.com/pressroom/press-releases/lenovo-launches-yoga-900s-as-worlds-thinnest-convertible-laptop/>
- Yoga 510, Yoga 710, Flex 4 (February 21, 2016):
<https://news.lenovo.com/pressroom/press-releases/lenovo-launches-new-travel-ready-windows-10-tablet-and-yoga-laptops/>
- Lenovo N23 (May 10, 2016): <https://news.lenovo.com/pressroom/press-releases/lenovo-launches-new-n23-and-n42-laptops-designed-for-k-12-institutions/>
- Yoga 910 (August 31, 2016): <https://news.lenovo.com/pressroom/press-releases/lenovo-pushes-the-portability-envelope-with-latest-yoga-laptop-and-tablet/>
- Yoga Book (August 31, 2016): <https://news.lenovo.com/pressroom/press-releases/lenovo-reveals-the-yoga-book-the-2-in-1-tablet-for-productivity-and-creativity/>
- Yoga 520, Yoga 720 (February 27, 2017): <https://news.lenovo.com/pressroom/press-releases/lenovo-sets-stage-for-new-mobility-with-smart-connected-devices-services/>
- Yoga 920 (August 31, 2017): <https://news.lenovo.com/pressroom/press-releases/lenovo-connects-consumers-with-powerful-reality-of-todays-new-smart-devices/>
- Yoga 530, Yoga 730 (February 26, 2018): <https://news.lenovo.com/pressroom/press-releases/lenovo-sees-intelligence-transforming-everything-at-mwc-2018-from-devices-to-data-center/>

- Yoga C930 (August 30, 2018): <https://news.lenovo.com/pressroom/press-releases/raising-the-bar-lenovo-design-vp-on-the-new-yoga-c930/>
- Yoga C730 (January 8, 2019): <https://news.lenovo.com/pressroom/press-releases/lenovo-yoga-smartest-consumer-computers-yet/>
- Lenovo 100e Windows, Lenovo 300e Windows (January 22, 2019): <https://news.lenovo.com/pressroom/press-releases/lenovo-laptops-amplify-learning-experiences-through-digital-innovation/>
- ThinkPad X390 Yoga (February 25, 2019): <https://news.lenovo.com/pressroom/press-releases/intelligent-mobile-computing-showcased-by-latest-thinkpad-laptops-mwc/>
- <https://news.lenovo.com/pressroom/press-releases/smarter-lenovo-thinkpad-laptops-engineered-for-future-workforce/>
- Yoga C740, Yoga S740, Yoga C940 (September 5, 2019): <https://news.lenovo.com/pressroom/press-releases/lenovo-launches-new-devices-offering-smarter-technology-for-all-ifa-tech-life/>
- Yoga Slim 7 (January 6, 2020): <https://news.lenovo.com/pressroom/press-releases/lenovo-breaks-barriers-with-new-consumer-technology-unveiled-at-ces-2020-2/>
- ThinkPad X13 Yoga, ThinkPad L13 Yoga (February 24, 2020): <https://news.lenovo.com/pressroom/press-releases/updated-thinkpad-laptop-portfolio-empowers-choice-and-business-freedom/>

51. Convertible devices like the Accused Products have played a significant role in Lenovo's profitability. For example:

- According to a 2013 article, Lenovo's CEO recognized that convertible devices that use the Windows 8 operating system "are helping the company break into the high-end segment for the North American market."
<https://www.cio.com/article/2388774/windows-8-convertibles-help-lenovo-break-into-high-end-pc-market.html>
- In a 2013 interview with McKinsey, Lenovo's CEO explained the impact that the Yoga had on Lenovo's fortunes in the United States: "Yoga, our ultrabook that functions both as a laptop and tablet, is a good example. Before we launched it, we had never addressed the high-priced laptop market in the US. Now, since launching Yoga, we have a more than 40 percent market share in the \$900-and-above price band in the US retail market. That's from this one product with just two models, a 13-inch and an 11-inch. It's been a huge, huge success. And it's not only helped us to grow our volume and market share but also to build our brand. It has repositioned us as a brand known for innovation."
http://sites.utexas.edu/chinaecon/files/2015/06/McKinsey_Interview-Lenovo-CEO-Yang.pdf
- In a 2013 interview with the Economic Times, Lenovo's CEO stated: "Yoga is a hybrid laptop that is also a tablet with touch capability. That's the future of notebook." <https://economictimes.indiatimes.com/opinion/interviews/lenovos-protect-and-attack-strategy-helped-it-expand-globally-yang-yuanqing-chairman-and-ceo-lenovo-group/articleshow/18281695.cms>
- In a 2013 interview with the Wall Street Journal, Lenovo's CEO stated that "high-end products, like the IdeaPad Yoga" had "helped raise average selling prices."

<https://blogs.wsj.com/digits/2013/08/15/qalenovo-ceo-on-smartphones-and-blackberry/>

52. Lenovo makes, uses, sells, offers for sale and imports the 3rd Generation ThinkPad X1 Yoga with a Windows 10 operating system and the device's features are described on Lenovo's website in various places, including but not limited to:

- <https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-yoga/ThinkPad-X1-Yoga-3rd-Gen/p/22TP2TXX13Y> ("ThinkPad Webpage")
- <https://www.lenovo.com//us/en/laptops/thinkpad/thinkpad-yoga/ThinkPad-X1-Yoga-3rd-Gen/p/22TP2TXX13Y/gallery/image> ("ThinkPad Photos")
- <https://www.lenovo.com//us/en/laptops/thinkpad/thinkpad-yoga/ThinkPad-X1-Yoga-3rd-Gen/p/22TP2TXX13Y/gallery/video> ("ThinkPad Video")
- https://psref.lenovo.com/syspool/Sys/PDF/Think_Tablets/ThinkPad_X1_Tablet_3rd_Gen/ThinkPad_X1_Tablet_3rd_Gen_Spec.PDF ("ThinkPad Specifications")
- <https://pcsupport.lenovo.com/us/en/products/accessory/pens-and-supplies/thinkpad-pen-pro-for-l380-yoga/solutions/VID500081> ("ThinkPad Yoga Modes")
- https://download.lenovo.com/pccbbs/mobiles_pdf/tp_x1_carbon-yoga_hmm_v3_en.pdf ("ThinkPad Hardware Maintenance Manual")
- <https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/thinkpad-x-series-laptops/thinkpad-x1-yoga-3rd-gen-type-20ld-20le-20lf-20lg/manuals/um500370> ("ThinkPad HTML User Guide")
- https://download.lenovo.com/pccbbs/mobiles_pdf/x1yoga_x1carbon_ug_en.pdf ("ThinkPad User Guide")

53. The user guide for the 3rd Generation ThinkPad X1 Yoga describes four operating modes.

Get to know YOGA modes (for X1 Yoga only)

Your computer display can be rotated to any angle up to 360 degrees.

Attention: Do not rotate the computer display with too much force, or apply too much force to the upper-right or upper-left corner of the computer display. Otherwise, the computer display or hinges might get damaged.



Your computer features the following four YOGA modes. You can switch among different modes according to your preference.

See ThinkPad User Guide, p. 28.

54. The keyboard is automatically disabled in three of the four operating modes.

Your computer features the following four YOGA modes. You can switch among different modes according to your preference.

Note: The keyboard and the pointing devices are automatically disabled in the stand mode, tent mode, and tablet mode. Use the touch screen to control your computer instead.



Notebook mode



Stand mode



Tent mode



Tablet mode

See ThinkPad User Guide, pp. 28-29.

55. On information and belief, the Accused Products identified in the table below were made, sold and offered for sale with Windows 10 pre-installed and are capable of operating in the four operating modes described in the preceding paragraph:

Flex 3 (11 inch)	https://www.lenovo.com/us/en/laptops/lenovo/flex-series/flex-3-11/
Flex 3 (14 inch)	https://www.lenovo.com/us/en/laptops/lenovo/flex-series/flex-3-14/
Flex 3 (15 inch)	https://www.lenovo.com/us/en/consumer-notebook/ideapad/ideapad-flex-series/Lenovo-Flex-3-1580/p/88LG8FX0647

Flex 4 (11 inch)	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-flex-series/IdeaPad-Flex-4-11-inch/p/88IP8FX0737
Flex 4 (14 inch)	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-flex-series/Lenovo-ideapad-FLEX-4-1470/p/88IP8FX0685
Flex 4 (15 inch)	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-flex-series/Lenovo-ideapad-FLEX-4-1570/p/88IP8FX0686
Flex 5 (14 inch)	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-flex-series/Flex-5-14/p/88IP8FX0831
Flex 5 (15 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/flex-series/flex-5-1570
Flex 6 (11 inch)	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-flex-series/Lenovo-FLEX-6-11IGM/p/88IP8FX0889
Flex 6 (14 inch)	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-flex-series/Lenovo-ideapad-FLEX-6-14IKB/p/88IP8FX0980
Flex 14	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-flex-series/Lenovo-IdeaPad-FLEX-14IWL/p/88IP8FX1271
Flex 15	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-flex-series/Lenovo-IdeaPad-FLEX-15IWL/p/88IP8FX1272
Edge 2	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/lenovo-edge-series-laptops/edge-2-1580
Yoga 3 (14 inch)	https://www.lenovo.com/us/en/laptops/lenovo/yoga-laptop-series/yoga-3-14/
Yoga 260	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-yoga/Yoga-260/p/22TP2TX260
Yoga 300	https://www.lenovo.com/us/en/consumer-notebook/lenovo-yoga/essential/Yoga-300-11/p/88YG3000595
Yoga 460	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-yoga/Yoga-460/p/22TP2TSS460
Yoga 500 (14 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-500-14isk
Yoga 500 (15 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-500-15isk
Yoga 510 (14 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-510-14ikb
Yoga 510 (15 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-510-15ikb

Yoga 520	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-520-14ikb
Yoga 530	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-530-14ikb
Yoga 700 (11 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Lenovo-YOGA-700-11ISK/p/88YG7000616
Yoga 700 (14 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/yoga-700-14/
Yoga 710 (11 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Yoga-710-11/p/88YG7000723
Yoga 710 (14 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Lenovo-YOGA-710-14IKB/p/88YG7000771
Yoga 710 (15 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Lenovo-YOGA-710-15IKB/p/88YG7000772
Yoga 720 (12 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Yoga-720-12/p/88YG7000919
Yoga 720 (13 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Yoga-720-13/p/88YG7000827
Yoga 720 (15 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Yoga-720-15/p/88YG7000828
Yoga 730 (13 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Yoga-730-13-/p/88YG7000964
Yoga 730 (15 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Yoga-730-15/p/88YG7000965
Yoga 900	https://www.lenovo.com/us/en/laptops/yoga/yoga-900-series/Yoga-900-13/p/88YG9000571
Yoga 900S	https://www.lenovo.com/us/en/laptops/yoga/yoga-900-series/Lenovo-YOGA-900S/p/88YG90S0572
Yoga 910	https://www.lenovo.com/us/en/laptops/yoga/yoga-900-series/Yoga-910/p/88YG9000786
Yoga 920	https://www.lenovo.com/us/en/laptops/yoga/yoga-900-series/Yoga-920-13/p/88YG9000859
Yoga Book with Windows	https://www.lenovo.com/us/en/tablets/windows-tablets/yoga-book-windows-series/Yoga-Book-with-Windows/p/ZZITZTWYB2L
Yoga C630	https://www.lenovo.com/us/en/laptops/yoga/yoga-c-series/Yoga-C630-13Q50/p/88YGC601090

Yoga C640	https://www.lenovo.com/us/en/laptops/yoga/yoga-c-series/Yoga-C640/p/88YGC601300
Yoga S730	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-700-series/Yoga-S730/p/88YGS701077
Yoga C740 (14 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Lenovo-Yoga-C740-14/p/88YGC701292
Yoga C740 (15 inch)	https://www.lenovo.com/us/en/laptops/yoga/700-series/Lenovo-Yoga-C740-15/p/88YGC701293
Yoga S740 (14 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-s740-14iil
Yoga S740 (15 inch)	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-700-series/Lenovo-IdeaPad-S740-15IRH/p/88IPS701212
Yoga C930	https://www.lenovo.com/us/en/laptops/yoga/yoga-900-series/Yoga-C930-13IKB/p/88YGC900982
Yoga Book C930	https://www.lenovo.com/us/en/laptops/yoga/yoga-900-series/Yoga-Book-C930/p/ZZIWWBYB1J
Yoga C940 (14 inch)	https://www.lenovo.com/us/en/laptops/yoga/yoga-900-series/Lenovo-Yoga-C940-14IIL/p/88YGC901221
Yoga C940 (15 inch)	https://www.lenovo.com/us/en/laptops/yoga/yoga-900-series/Lenovo-Yoga-C940-15IRH/p/88YGC901298
Yoga S940	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-900-series/Lenovo-IdeaPad-S940-14IWL/p/88IPS901238
Yoga Slim 7 (14 inch)	https://www.lenovo.com/us/en/coming-soon/IdeaPad-Slim-7-14ARE05/p/88IPS701400
Yoga Slim 7 (15 inch)	https://www.lenovo.com/us/en/laptops/ideapad/ideapad-700-series/IdeaPad-Slim-7-15IIL05/p/88IPS701406
Yoga P40	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-p/ThinkPad-P40-Yoga/p/22TP2WPWP40
LaVie 360	https://www.lenovo.com/us/en/laptops/lenovo/lavie/lavie-360/
3 rd Generation ThinkPad Yoga 11e	https://www.lenovo.com/us/en/laptops/thinkpad/11e-and-chromebooks/20GA-MT/p/22TP2TX152E20GA
4 th Generation ThinkPad Yoga 11e	https://www.lenovo.com/us/en/laptops/thinkpad/11e-and-chromebooks/ThinkPad-Yoga-11e-4th-Gen/p/22TP2TX153E20HU
5 th Generation ThinkPad Yoga 11e	https://www.lenovo.com/us/en/outletus/laptops/thinkpad/thinkpad-11e-laptops-and-chromebooks/ThinkPad-Yoga-11e-5th-Gen/p/22TP2TX154E20LM

6 th Generation ThinkPad Yoga 11e	https://www.lenovo.com/us/en/coming-soon/11e-Yoga-G6/p/22ED11E11N6
ThinkPad Yoga 14	https://www.lenovo.com/us/en/laptops/thinkpad/yoga-series/yoga-14/
ThinkPad Yoga 15	https://www.lenovo.com/us/en/laptops/thinkpad/yoga-series/yoga-15/
ThinkPad L380 Yoga	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-yoga/ThinkPad-L380-Yoga/p/22TP2TBL38020M7
ThinkPad L390 Yoga	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-l/ThinkPad-L390-Yoga/p/WMD00000384
1st Generation ThinkPad X1 Yoga	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-x/ThinkPad-X1-Yoga-1st-Gen/p/22TP2TXX11Y
2nd Generation ThinkPad X1 Yoga	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-yoga/Thinkpad-X1-Yoga-2nd-Gen/p/22TP2TXX12Y
3rd Generation ThinkPad X1 Yoga	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-yoga/ThinkPad-X1-Yoga-3rd-Gen/p/22TP2TXX13Y
4th Generation ThinkPad X1 Yoga	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-x/X1-Yoga-Gen-4/p/22TP2TXX14Y
5th Generation ThinkPad X1 Yoga	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-x/X1-Yoga-Gen-5/p/22TP2X1X1Y5
ThinkPad Yoga X380	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-x/ThinkPad-X380-Yoga/p/22TP2TXX380
ThinkPad Yoga X390	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-x/ThinkPad-X390-Yoga/p/22TP2TX390Y
ThinkPad L13 Yoga	https://www.lenovo.com/us/en/laptops/thinkpad/thinkpad-l/ThinkPad-L13-Yoga/p/22TPL13L3Y1
Lenovo 300e Windows	https://www.lenovo.com/us/en/laptops/lenovo/student-laptops/Lenovo-300e-2nd-Gen/p/88EL10S9992
Lenovo 300e Winbook	https://www.lenovo.com/us/en/laptops/lenovo/student-laptops/300e/p/88EL10S1024
Lenovo N23 Winbook	https://www.lenovo.com/us/en/laptops/lenovo/lenovo-n-series/N23/p/88EL10S0756

56. According to Lenovo's website, Lenovo has tested the Accused Products identified in the table below for compatibility with Windows 10.

<https://support.lenovo.com/us/en/solutions/ht103535>.

IdeaPad Yoga 13	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-13-notebook-ideapad
IdeaPad Yoga 11S	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-11s-notebook-ideapad
Flex 2 (14 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/flex-series/flex-2-14-notebook-lenovo
Flex 2 (15 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/flex-series/flex-2-15-notebook-lenovo
Flex 10	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/flex-series/flex-10-notebook-lenovo
Flex 14D	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/flex-series/ideapad-flex-14d-notebook
Flex 15D	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/flex-series/ideapad-flex-15d-notebook
Edge 15	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/lenovo-edge-series-laptops/edge-15-laptop-lenovo
Yoga 2 (11 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-2-11-notebook-lenovo
Yoga 2 (13 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-2-13-notebook-lenovo
Yoga 2 Pro	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-2-pro-lenovo
Yoga 3 (11 inch)	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-3-1170
Yoga 3 Pro	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/yoga-series/yoga-3-pro-1370-laptop-lenovo
1 st Generation ThinkPad Yoga 11e	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/thinkpad-yoga-series-laptops/thinkpad-yoga-11e
2 nd Generation ThinkPad Yoga 11e	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/thinkpad-yoga-series-laptops/thinkpad-yoga-11e-20e5-20e7
ThinkPad Yoga 12	https://pcsupport.lenovo.com/us/en/products/laptops-and-netbooks/thinkpad-yoga-series-laptops/thinkpad-yoga-12

57. To the extent that Lenovo made, used, sold, offered to sell or imported any of the Accused Products with a Windows operating system other than Windows 10, Lenovo offered

purchasers of such products the ability to upgrade to Windows 10 for free until July 29, 2016.

<https://support.lenovo.com/us/en/solutions/ht103748> and

<https://www.lenovo.com/us/en/windows-10/>

58. On information and belief, the 3rd Generation ThinkPad X1 Yoga is representative of the Accused Products with respect to the limitations recited in the claims of the Asserted Patents.

59. 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 Lenovo 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.

60. Lenovo 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 Lenovo's infringement of the Asserted Patents, find this case exceptional and award LiTL its attorneys' fees and costs, and grant an injunction against Lenovo to prevent ongoing infringement of the Asserted Patents.

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

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

62. Lenovo has infringed and continues to infringe, directly and/or indirectly, literally and/or equivalently, one or more claims of the '688 patent, including at least claim 19, by

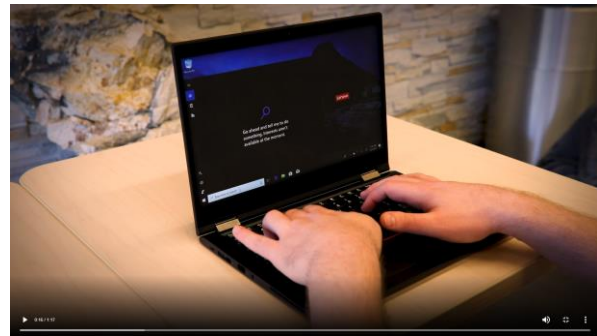
making, using, selling, offering for sale in, and/or importing into, the United States certain computing devices with multiple display modes, including at least the Accused Products.

63. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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:

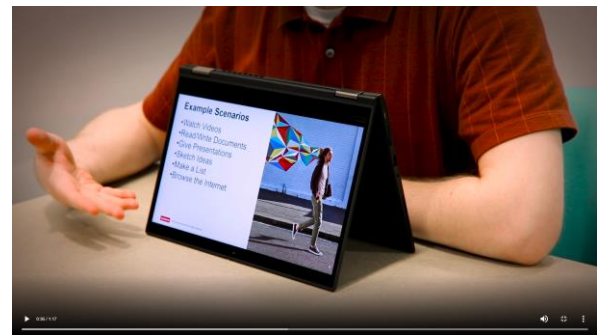
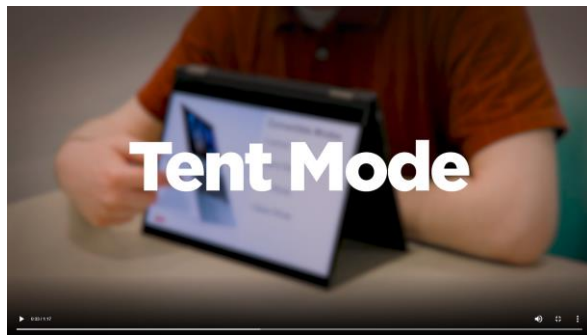


See, e.g., ThinkPad Photos.

64. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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:

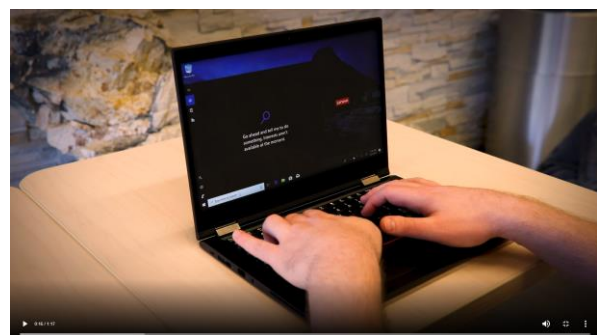


See, e.g., ThinkPad Yoga Modes at 0:14-0:23.



See, e.g., ThinkPad Yoga Modes at 0:32-0:36.

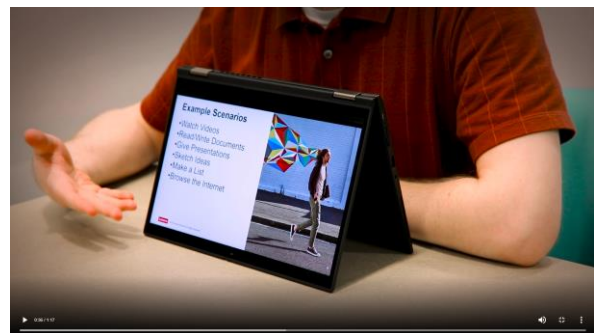
65. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a display orientation module that is configured to detect a change between a laptop mode, an easel mode, and a frame mode based on the detected physical orientation of the single display unit relative to the base unit. For example:



See, e.g., ThinkPad Yoga Modes at 0:14-0:23.



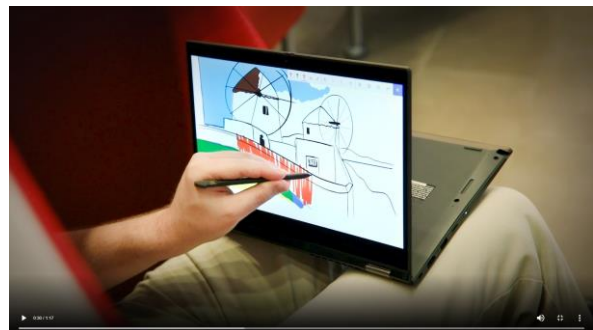
See, e.g., ThinkPad Photos, image with caption: “Lenovo ThinkPad X1 Yoga (3rd Gen) in laptop mode.”



See, e.g., ThinkPad Yoga Modes at 0:32-0:36.



See, e.g., ThinkPad Photos, image with caption: “Lenovo ThinkPad X1 Yoga (3rd Gen) in tent mode with Skype for Business.”



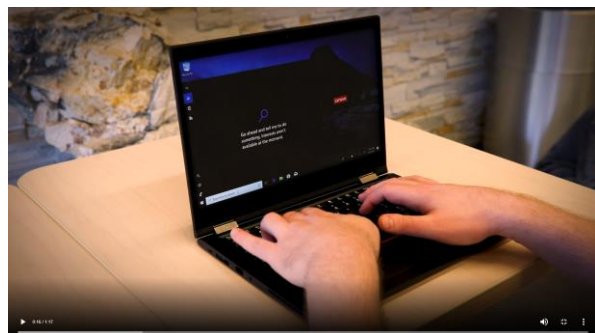
See, e.g., ThinkPad Yoga Modes at 0:24-0:31.



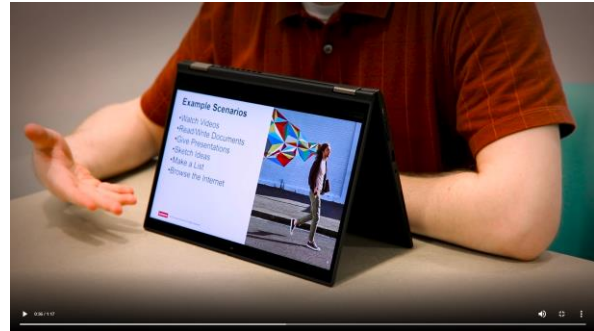
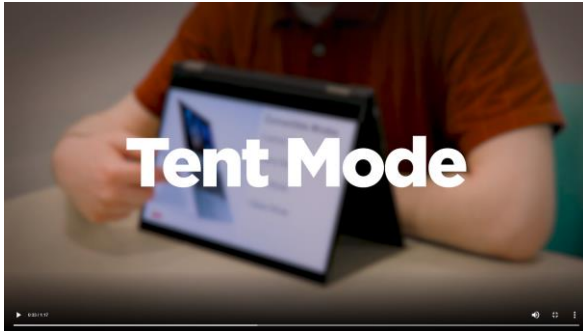
See, e.g., ThinkPad Photos, image with caption: “Lenovo ThinkPad X1 Yoga (3rd Gen) in stand mode with home design app.”

See, e.g., ThinkPad Video at 0:36-0:43.

66. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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:

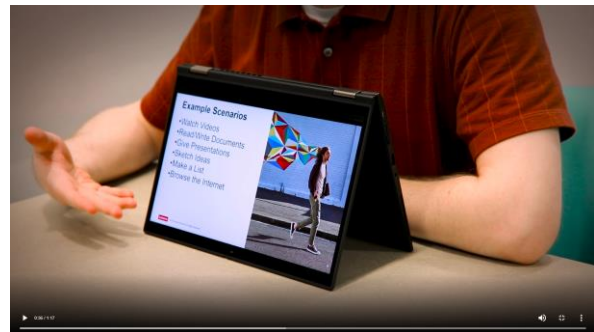
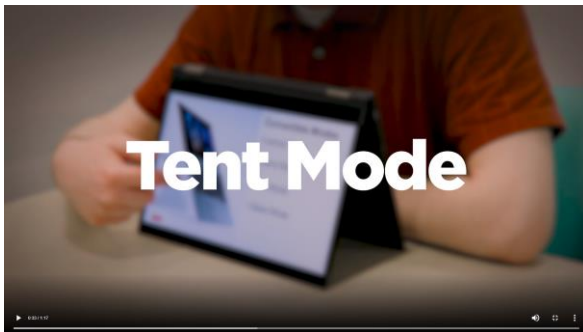


See, e.g., ThinkPad Yoga Modes at 0:14-0:23.

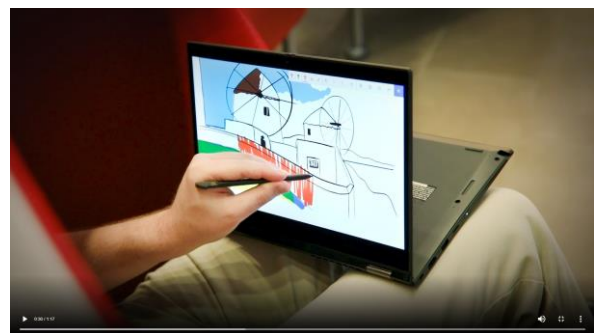


See, e.g., ThinkPad Yoga Modes at 0:32-0:36.

67. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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:



See, e.g., ThinkPad Yoga Modes at 0:32-0:36.



See, e.g., ThinkPad Yoga Modes at 0:24-0:31.

Before the Filing of This Complaint, Lenovo Knew of the '688 Patent and Knew or Should Have Known that Lenovo Products Infringe the '688 Patent

68. Since at least 2016 Lenovo Beijing has had knowledge of the '688 patent.

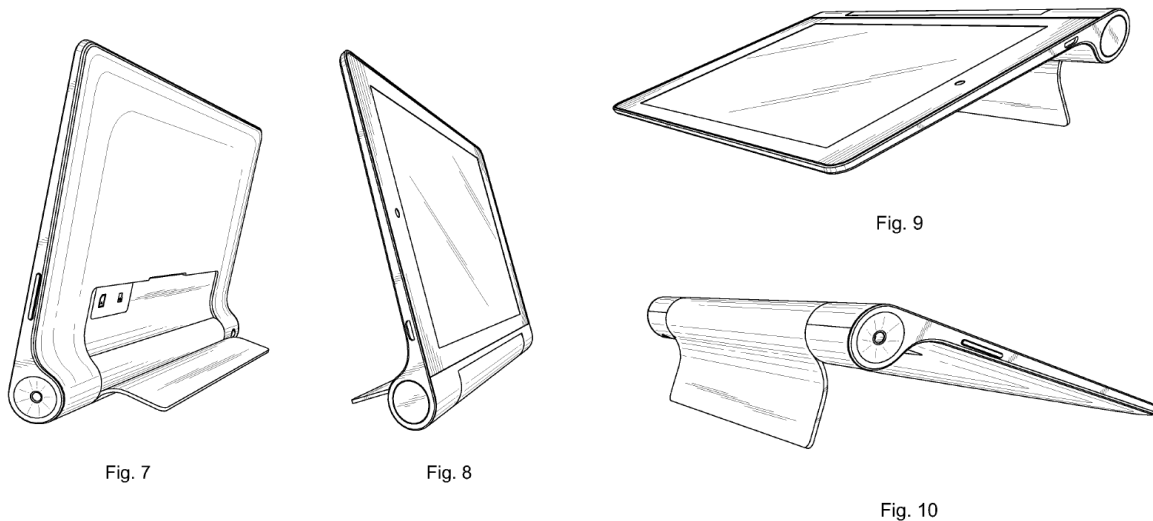
69. On March 13, 2013, Lenovo Beijing filed U.S. Patent Application No. 14/209,145 ("the Lenovo '145 application"). In a list of references cited by examiner dated September 15, 2016, a USPTO examiner identified to Lenovo Beijing the '688 patent.

70. On November 13, 2013, Lenovo Beijing filed U.S. Patent Application No. 14/079,046 ("the Lenovo '046 application"). In office actions dated January 27, 2015, May 21, 2015, December 11, 2015 and April 18, 2016, a USPTO examiner rejected pending claims 4 and 14 of the Lenovo '046 application as obvious in view of, among other references, U.S. Patent Publication No. 2009/0244832 ("Behar"), which issued as the '688 patent and contains the same specification. In a response dated March 23, 2015, Lenovo Beijing admitted that "Behar teaches a portable computer that has a laptop mode and an easel mode in which the base of the computer and its display component stand vertically forming an inverted 'V' and the base of the computer comprises a keyboard (Fig. 1 and Fig. 4)."

71. On February 14, 2014, Lenovo Beijing filed U.S. Patent Application No. 14/181,072 ("the Lenovo '072 application"). In an office action dated October 21, 2016, a USPTO examiner issued a non-final rejection of pending claim 17 of the Lenovo '072 application as obvious in view of, among other references, U.S. Patent Publication No. 2009/0244832 ("Behar"), which issued as the '688 patent and contains the same specification. On March 31, 2017, the examiner issued a notice of references cited, and identified to Lenovo Beijing the '688 patent.

72. On September 30, 2016, Lenovo Beijing filed U.S. Patent Application No. 29/579,625 ("the Lenovo '625 application") directed to an ornamental design for a tablet

computer. Figures 7 and 8 depict front and back perspectives of the tablet computer with the stand in a first position. Figures 9 and 10 depict the tablet computer in a horizontal orientation.



73. On March 20, 2017, Lenovo Beijing identified the '688 patent in an information disclosure statement submitted to the USPTO in connection with the Lenovo '625 application.

74. On September 30, 2016, Lenovo Beijing filed U.S. Patent Application No. 29/579,629 ("the Lenovo '629 application") directed to an ornamental design for a tablet computer. On May 22, 2017, Lenovo Beijing identified the '688 patent in an information disclosure statement submitted to the USPTO in connection with the Lenovo '629 application.

75. On August 8, 2017, the USPTO issued U.S. Patent No. 9,727,091 ("the Lenovo '091 patent") to Lenovo Beijing. The '688 patent is cited on the face of the Lenovo '091 patent.

76. Since at least 2016 Lenovo Beijing knew or should have known, or at a minimum acted with willful blindness to the fact that, the Accused Products sold on its website and bearing its marks infringe one or more claims of the '688 patent based on at least the following:

- the USPTO's repeated rejections of claims in Lenovo Beijing patent applications based on the '688 patent or its published application;

- Lenovo Beijing’s admission that the specification of the ’688 patent discloses “a portable computer that has a laptop mode and an easel mode in which the base of the computer and its display component stand vertically forming an inverted ‘V’ and the base of the computer comprises a keyboard”; and
- Lenovo Beijing’s disclosure of the ’688 patent in information disclosure statements.

77. In addition, Lenovo Beijing has known that the Accused Products sold on its website and bearing its marks infringe one or more claims of the ’688 patent since at least the filing of this Complaint.

Indirect and Willful Infringement

78. Lenovo has known that its Accused Products infringe the ’688 patent since at least the filing of this Complaint.

79. Lenovo has known or should have known since at least the filing of this Complaint that end users, importers, distributors, retailers, repair and service technicians, Lenovo employees and contractors, and other users of the Accused Products are infringing the ’688 patent at least because Lenovo has known that it is infringing the ’688 patent.

80. Lenovo has actively and knowingly induced, and is actively and knowingly inducing, infringement of one or more claims of the ’688 patent, at least by inducing end users, repair and service technicians, Lenovo employees and contractors, and others to use the Accused Products in an infringing manner. Lenovo instructs such users by way of manuals or product documentation to infringe the asserted claims by using the Accused Products. For example, in the ThinkPad HTML User Guide Lenovo instructs users that the 3rd Generation ThinkPad X1 Yoga “can be opened to any angle within a range of up to 360 degrees” and that “[b]y rotating the display to different angle, your computer features the following four operating modes”:



Notebook mode



Stand mode



Tent mode



Tablet mode

See ThinkPad HTML User Guide, Using Your ThinkPad / Using your computer / Operating modes.

81. Lenovo has had knowledge of the '688 patent and its infringement of the '688 patent since at least the filing of this Complaint. Lenovo's inducement of infringement of the '688 patent has been done with specific intent to infringe that patent.

82. Lenovo has contributed, and continues to contribute, to the infringement of one or more claims of the '688 patent by offering to sell, selling, and/or importing into the United States a component of the Accused Products, or a material or apparatus for use in practicing a process

claimed in the '688 patent, that constitutes a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement of the '688 patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

83. Lenovo Beijing's infringement of the '688 patent has been willful since at least 2016. Lenovo's ongoing infringement of the '688 patent continues to be willful. Lenovo has chosen to manufacture, offer to sell and/or sell the Accused Products, even after LiTL's notice, knowing that such products would infringe the '688 patent.

84. The foregoing description of Lenovo'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.

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

86. Lenovo's infringement of the '688 patent has damaged and continues to damage LiTL in an amount yet to be determined, of at least a reasonable royalty.

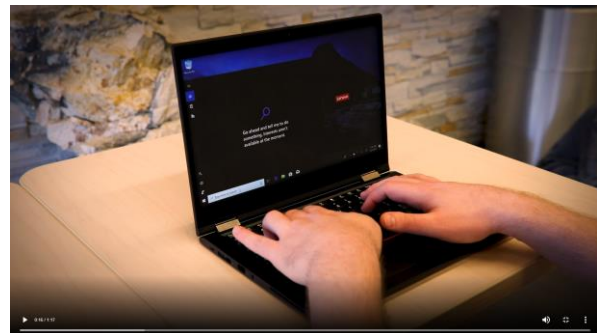
COUNT II
(Infringement of U.S. Patent No. 8,624,844)

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

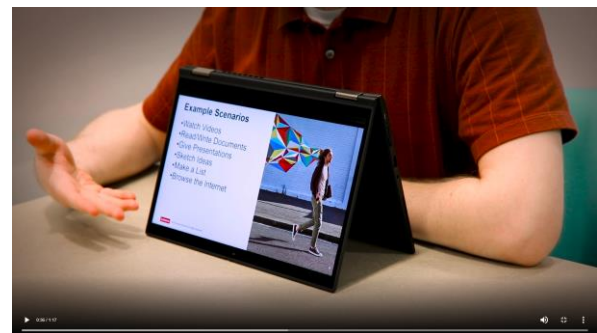
88. Lenovo has infringed and continues to infringe, directly and/or indirectly, literally and/or equivalently, one or more claims of the '844 patent, including at least claim 10, by making, using, selling, offering for sale in, and/or importing into, the United States certain computing devices with multiple display modes, including at least the Accused Products.

89. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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:



See, e.g., ThinkPad Yoga Modes at 0:14-0:23.



See, e.g., ThinkPad Yoga Modes at 0:32-0:36.

90. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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:



See, e.g., ThinkPad Photos.

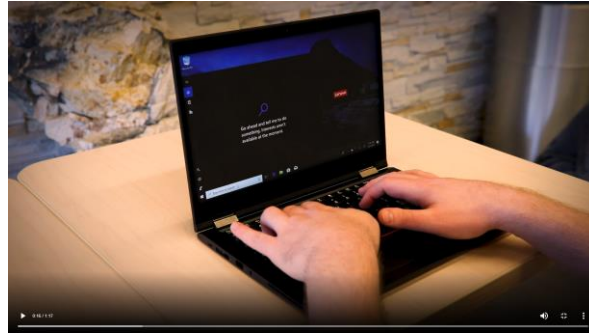
91. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a hinge assembly disposed at least partially within the base. For example:



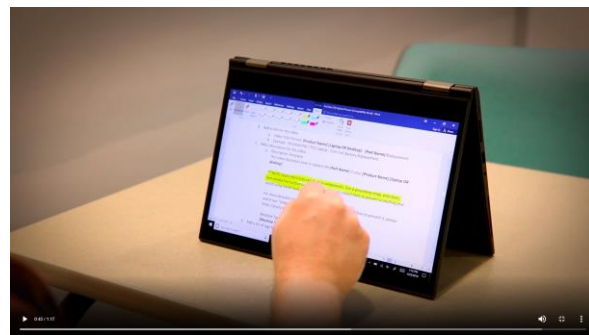
See, e.g., ThinkPad Photos.

92. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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:

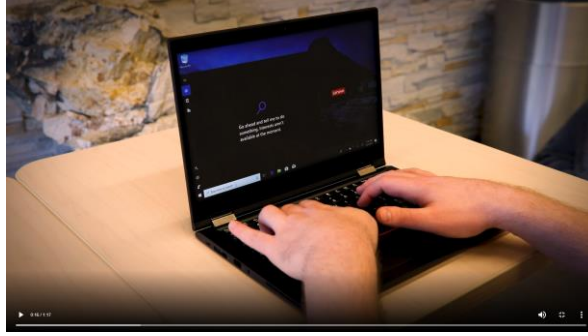


See, e.g., ThinkPad Yoga Modes at 0:14-0:23.



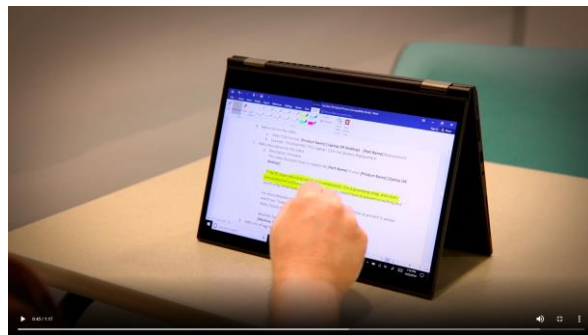
See, e.g., ThinkPad Yoga Modes at 0:42-0:47.

93. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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:



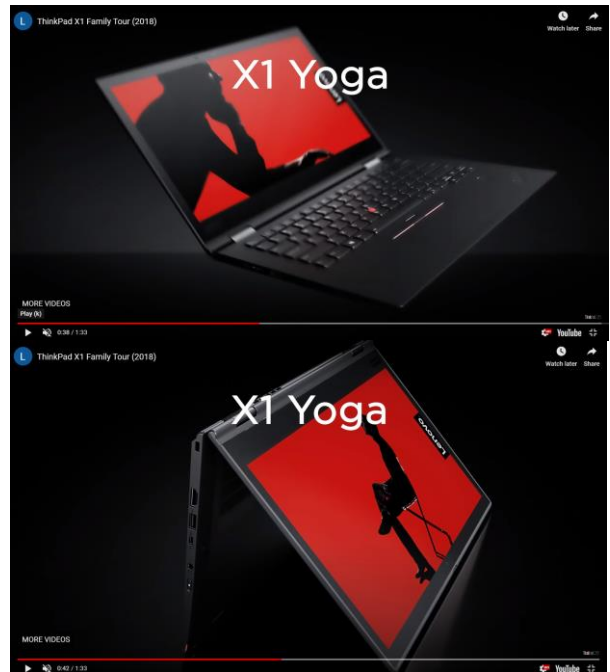
See, e.g., ThinkPad Yoga Modes at 0:14-0:23.

94. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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:



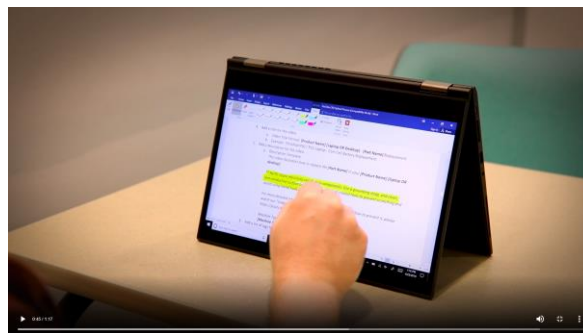
See, e.g., ThinkPad Yoga Modes at 0:42-0:47.

95. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include first and second content display orientations that are 180 degrees relative to each other. For example:



See, e.g., ThinkPad Yoga Video at 0:38-0:42.

96. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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:



See, e.g., ThinkPad Yoga Modes at 0:42-0:47.

97. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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

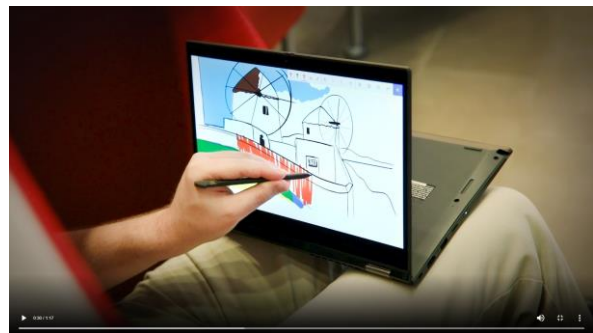
displayed on the single display screen. For example, the 3rd Generation ThinkPad X1 Yoga includes a touchscreen that is accessible in any mode.

Display Type ⓘ

14.0" FHD (1920 x 1080) IPS anti-reflective, anti-smudge, touchscreen, 300 nits

See, e.g., ThinkPad Webpage.

98. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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.



See, e.g., ThinkPad Yoga Modes at 0:24-0:31.

Before the Filing of This Complaint, Lenovo Knew or Should Have Known of the '844 Patent and Knew or Should Have Known that Lenovo Products Infringe the '844 Patent

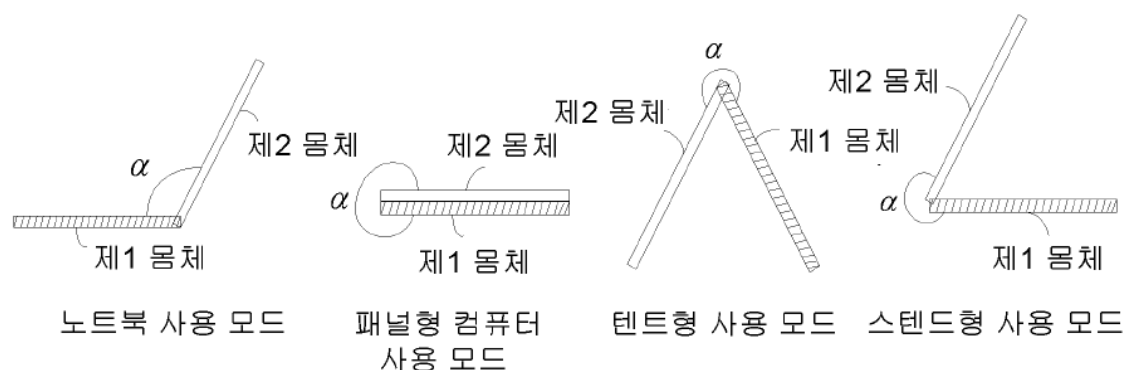
99. On January 7, 2014, the '844 patent issued from U.S. Patent Application No. 12/170,951, which had earlier published on October 1, 2009 as U.S. Patent Publication No. 2009/0244012 ("the LiTL '012 publication").

100. Since at least 2012 Lenovo Beijing has had knowledge of the LiTL '012 publication.

101. On October 22, 2012, the Chinese Intellectual Property Office issued a search report to Lenovo Beijing identifying the '012 publication in connection with Lenovo's Chinese Patent Application No. 2010102585153. The Chinese Intellectual Property Office issued three office actions dated November 26, 2012, August 1, 2013 and February 24, 2014, which rejected Lenovo Beijing's pending claims based on the disclosures in the LiTL '012 publication. In particular, the first office action stated that the LiTL '012 publication disclosed that: "Laptop computers can be configured between modes, includes an off mode, a laptop mode (corresponding to a first state), an easel mode (corresponding to a second state different from the first state), a flattened mode, and a frame mode."

102. In an examination report dated February 14, 2014, the Korean Intellectual Property Office rejected several claims in Lenovo Beijing's Korean Patent Application No. 10-2013-0025594 ("the Lenovo '594 Korean application") in view of the LiTL '012 publication. Figure 2 of the Lenovo '594 Korean application depicts four usage modes of a notebook computer that embodies the subject matter disclosed therein:

대표도 - 도2



103. Figure 18 of the Lenovo '594 Korean application depicts a notebook computer that embodies the subject matter disclosed therein:



104. The Lenovo '594 Korean application is a foreign counterpart to Lenovo Beijing's U.S. Patent Application No. 13/793,836 ("the Lenovo '836 application"). When prosecuting the Lenovo '836 application, Lenovo Beijing filed an information disclosure statement dated January 28, 2015, in which it identified to the USPTO the LiTL '012 publication and the Korean Intellectual Property Office examination report dated February 14, 2014.

105. The Lenovo '836 application, paragraph 59, describes Figure 2, which "is an exemplary view of four usage modes in an electrical device provided in the embodiments of the present disclosure." Figure 2 of the Lenovo '836 application is depicted below:

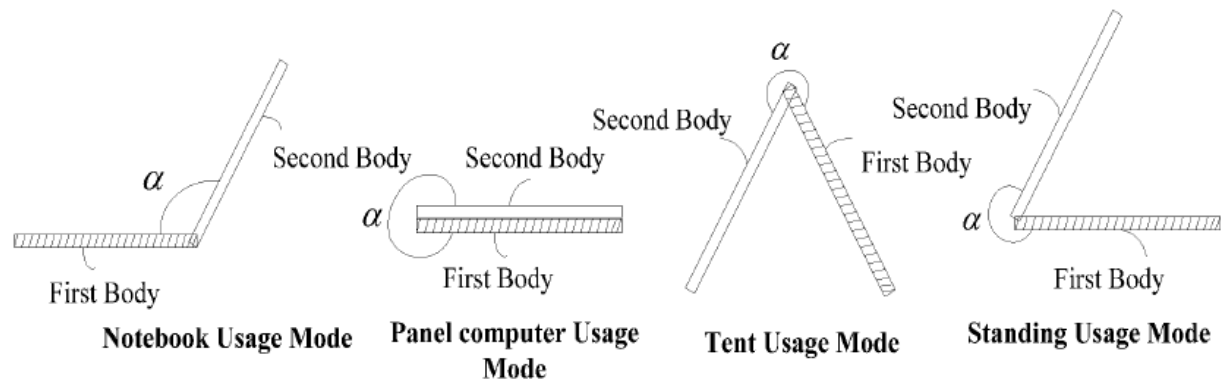


Fig. 2

106. The '836 application, paragraph 75, describes Figures 18a to 18d, which “illustrate the four usage modes in the notebook computer according to the embodiment of the present disclosure.” Figures 18a to 18d of the Lenovo '836 application are depicted below:

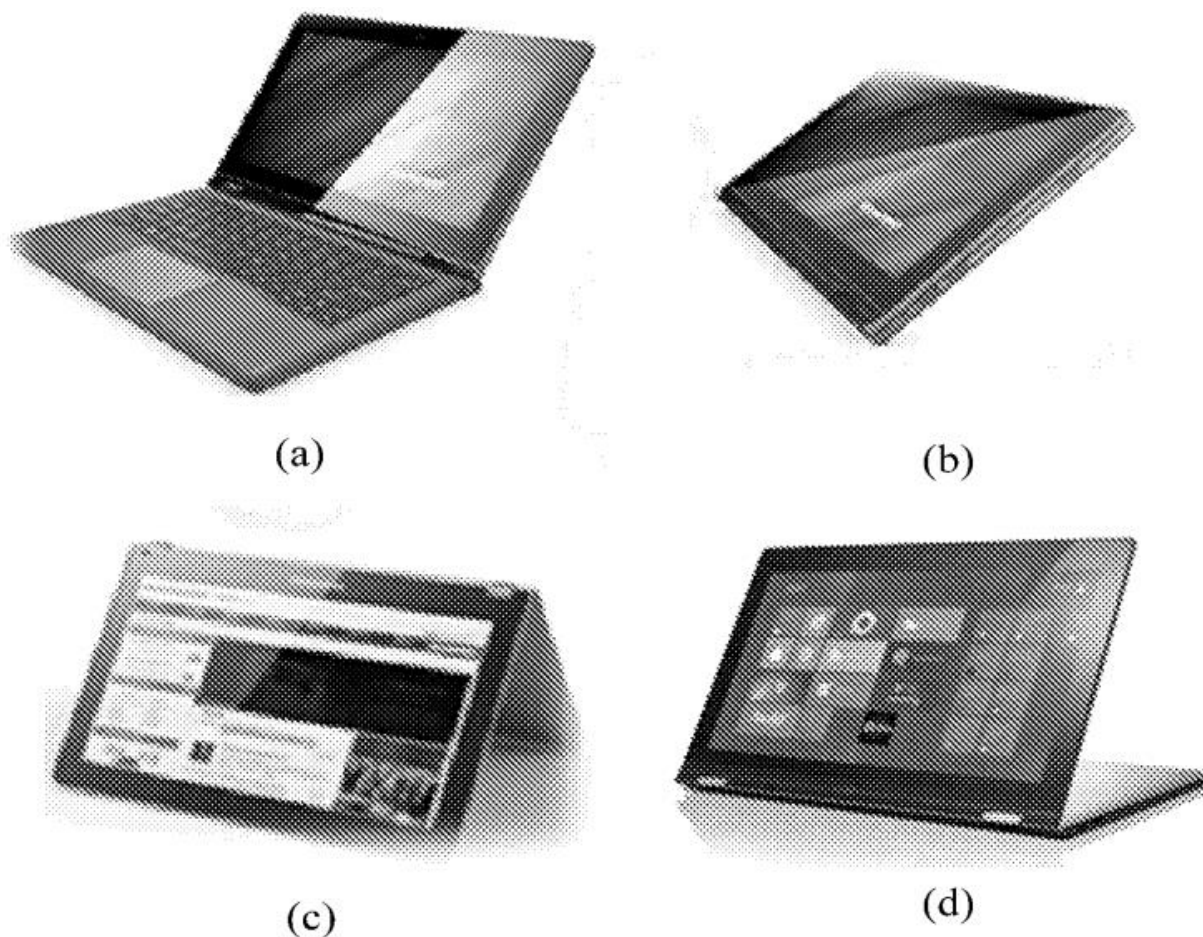


Fig.18

107. The notebook computer depicted in Figure 18 of the Lenovo '836 application and of Figure 18 of its Korean counterpart, the Lenovo '594 Korean application, appears to be one of Lenovo's Yoga notebooks. The four modes disclosed in the Lenovo '836 application and in the Lenovo '594 Korean application are the same four operating modes of the Accused Products. For example, Lenovo depicted the four modes in product literature for the 3rd Generation ThinkPad X1 Yoga.

Get to know YOGA modes (for X1 Yoga only)

Your computer display can be rotated to any angle up to 360 degrees.

Attention: Do not rotate the computer display with too much force, or apply too much force to the upper-right or upper-left corner of the computer display. Otherwise, the computer display or hinges might get damaged.



Your computer features the following four YOGA modes. You can switch among different modes according to your preference.

See ThinkPad User Guide, p. 28.



Notebook mode



Stand mode



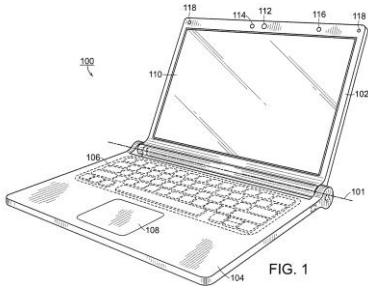
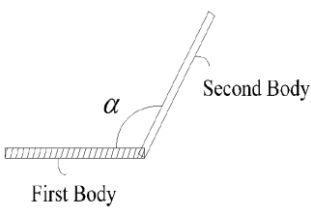
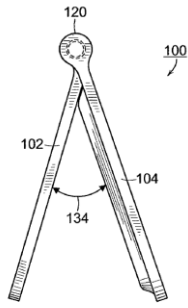
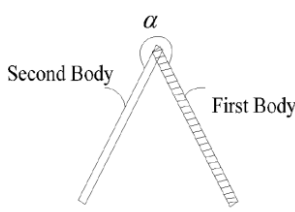
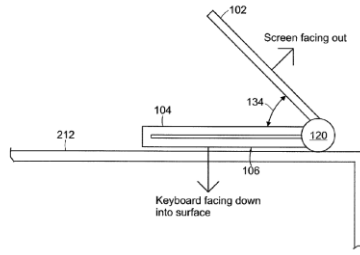
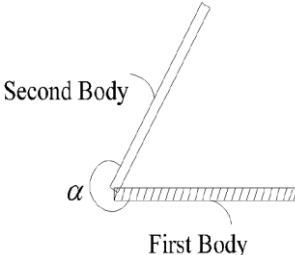
Tent mode



Tablet mode

See ThinkPad User Guide, pp. 28-29.

108. The three modes disclosed in Figures 1, 5 and 26 of the LiTL '012 publication and claimed as the “laptop mode,” “easel mode” and “frame mode” in claim 10 of the '844 patent match the “notebook usage mode,” “tent usage mode” and “standing usage mode” of the Lenovo '836 application and also the Lenovo '594 Korean application, whose claims were rejected over the Litl '012 publication:

 FIG. 1	 Second Body α First Body Notebook Usage Mode	
Litl '012 publication, Fig. 1 Laptop Mode	Lenovo '836 application, Fig. 2	Lenovo '594 Korean application, Fig. 18(a)
 FIG. 5	 Second Body α First Body Tent Usage Mode	
Litl '012 publication, Fig. 5 Easel Mode	Lenovo '836 application, Fig. 2	Lenovo '594 Korean application, Fig. 18
 FIG. 26	 Second Body α First Body Standing Usage Mode	
Litl '012 publication, Fig. 26 Frame Mode	Lenovo '836 application, Fig. 2	Lenovo '594 Korean application, Fig. 18

109. Lenovo has extensive experience with intellectual property. Lenovo Beijing has been the owner of over 2,500 patent applications and over 2,200 patents. Over the past decade, Lenovo US has been involved in over 200 patent litigations in the United States, and has been a party in over 50 *inter partes* review proceedings before the U.S. Patent Trial and Appeals Board. The Lenovo 2019 Annual Report identifies intellectual property (IP) risk as one of the “key risks that the Group considers to be of great significance to the Group as it stands today.”

<https://doc.irasia.com/listco/hk/lenovo/annual/2019/ar2019.pdf>, page22. For example, the report recognizes that Lenovo could suffer “reputational harm if found to infringe a third party’s valid patents.” <https://doc.irasia.com/listco/hk/lenovo/annual/2019/ar2019.pdf>, page 27. To manage and mitigate its IP risk, Lenovo plans to: “Monitor, develop and execute IP litigation defense strategy” and “License IP as appropriate and monitor its continued validity and value to the Group.”

110. Consistent with Lenovo’s sophistication with IP matters, on information and belief, Lenovo Beijing was aware by 2016 of the family of LiTL patents and applications to which the ’844 patent belongs.

111. LiTL’s U.S. Patent No. 9,003,315 (“the ’315 patent”) states that “application No. 12/170,951, filed on Jul. 10, 2008, now Pat. No. 8,624,844.” Lenovo Beijing knew of the ’315 patent by at least 2016, when it was cited to Lenovo Beijing by the USPTO during prosecution of Lenovo Beijing’s U.S. Patent Application No. 14/209,145. During prosecution of that application, Lenovo Beijing received an office action dated September 15, 2016 that cited LiTL’s U.S. Patent No. 9,003,315 (“the ’315 patent”). By at least September 15, 2016, Lenovo Beijing knew or should have known that the LiTL U.S. Pat. Application No. 12/170,951, which published as the LiTL ’012 publication, had issued as the ’844 patent on January 7, 2014.

112. Since at least 2016 Lenovo Beijing knew or should have known, or at a minimum acted with willful blindness to the fact, that the Accused Products sold on its website and bearing its marks infringe one or more claims of the ’844 patent based on at least the following:

- The numerous instances in which the USPTO and patent offices around the world have cited the LiTL ’012 publication to Lenovo during prosecution of Lenovo Beijing’s own patent applications;

- the Lenovo Beijing patent applications that were rejected over or cited to the LiTL '012 publication were also directed to subject matter embodied by the Accused Products, including the usage modes such as the laptop mode, tent/easel mode, and stand/frame mode, which are recited in claim 10 of the '844 patent;
- Lenovo Beijing is a sophisticated actor with respect to intellectual property; and
- Lenovo Beijing knew or should have known, or was willfully blind to the fact, that the LiTL '012 publication had issued as the '844 patent.

113. In addition, Lenovo has known that the Accused Products sold on its website and bearing its marks infringe one or more claims of the '844 patent since at least the filing of this Complaint.

Indirect and Willful Infringement

114. Lenovo has known that its Accused Products infringe the '844 patent since at least the filing of this Complaint.

115. Lenovo has known or should have known since at least the filing of this Complaint that end users, importers, distributors, retailers, repair and service technicians, Lenovo employees and contractors, and other users of the Accused Products are infringing the '844 patent at least because Lenovo has known that it is infringing the '844 patent.

116. Lenovo has actively and knowingly induced, and is actively and knowingly inducing, infringement of one or more claims of the '844 patent, at least by inducing end users, repair and service technicians, Lenovo employees and contractors, and others to use the Accused Products in an infringing manner. Lenovo instructs such users by way of manuals or product documentation to infringe the asserted claims by using the Accused Products. For example, in the ThinkPad HTML User Guide Lenovo instructs users that the 3rd Generation ThinkPad X1

Yoga “can be opened to any angle within a range of up to 360 degrees” and that “[b]y rotating the display to different angle, your computer features the following four operating modes”:



Notebook mode



Stand mode



Tent mode



Tablet mode

See ThinkPad HTML User Guide, Using Your ThinkPad / Using your computer / Operating modes.

117. Lenovo has had knowledge of the '844 patent and its infringement of the '844 patent since at least the filing of this Complaint. Lenovo's inducement of infringement of the '844 patent has been done with specific intent to infringe that patent.

118. Lenovo has contributed, and continues to contribute, to the infringement of one or more claims of the '844 patent by offering to sell, selling, and/or importing into the United States a component of the Accused Products, or a material or apparatus for use in practicing a process claimed in the '844 patent, that constitutes a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement of the '844 patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

119. Lenovo Beijing's infringement of the '844 patent has been willful since at least 2016. Lenovo's ongoing infringement of the '844 patent continues to be willful. Lenovo has chosen to manufacture, offer to sell and/or sell the Accused Products, even after LiTL's notice, knowing that such products would infringe the '844 patent.

120. The foregoing description of Lenovo'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.

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

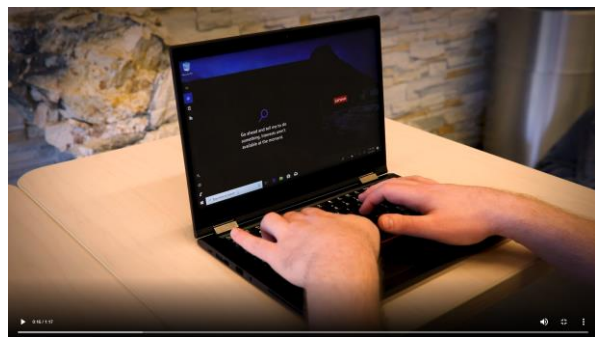
122. Lenovo's infringement of the '844 patent has damaged and continues to damage LiTL in an amount yet to be determined, of at least a reasonable royalty.

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

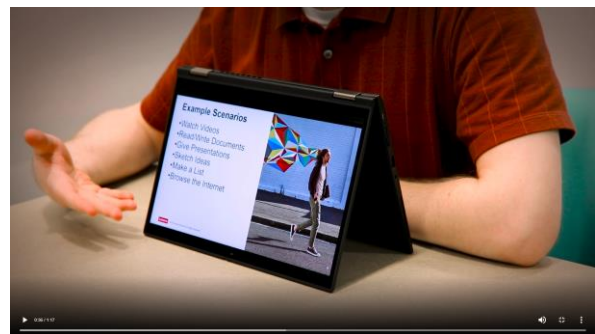
123. LiTL incorporates by reference and realleges all the foregoing paragraphs of this Complaint as if fully set forth herein.

124. Lenovo has infringed and continues to infringe, directly and/or indirectly, literally and/or equivalently, one or more claims of the '154 patent, including at least claim 11, by making, using, selling, offering for sale in, and/or importing into, the United States certain computing devices with multiple display modes, including at least the Accused Products.

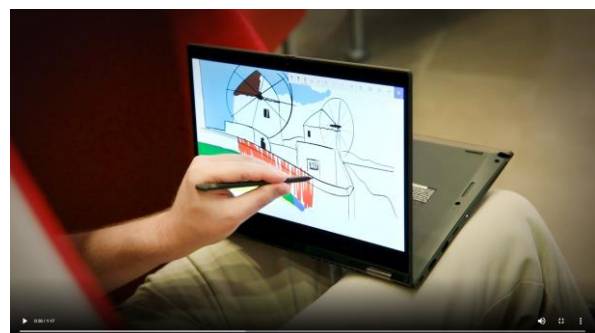
125. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) are portable computers that are configurable between a plurality of display modes comprising a first mode, a second mode, and a third mode. For example:



See, *e.g.*, ThinkPad Yoga Modes at 0:14-0:23.



See, *e.g.*, ThinkPad Yoga Modes at 0:32-0:36.



See, e.g., ThinkPad Yoga Modes at 0:24-0:31.

126. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a display component comprising a surface and a display screen disposed in the surface of the display component. For example:



See, e.g., ThinkPad Photos.

127. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a camera disposed in the surface of the display component. For example:



See, e.g., ThinkPad Yoga Video at 0:50.

128. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a base comprising a first surface and a second surface, a keyboard disposed in the first surface of the base, and a touchpad disposed in the first surface of the base.



See, e.g., ThinkPad Photos.

129. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a power button disposed in the second surface of the base. For example:



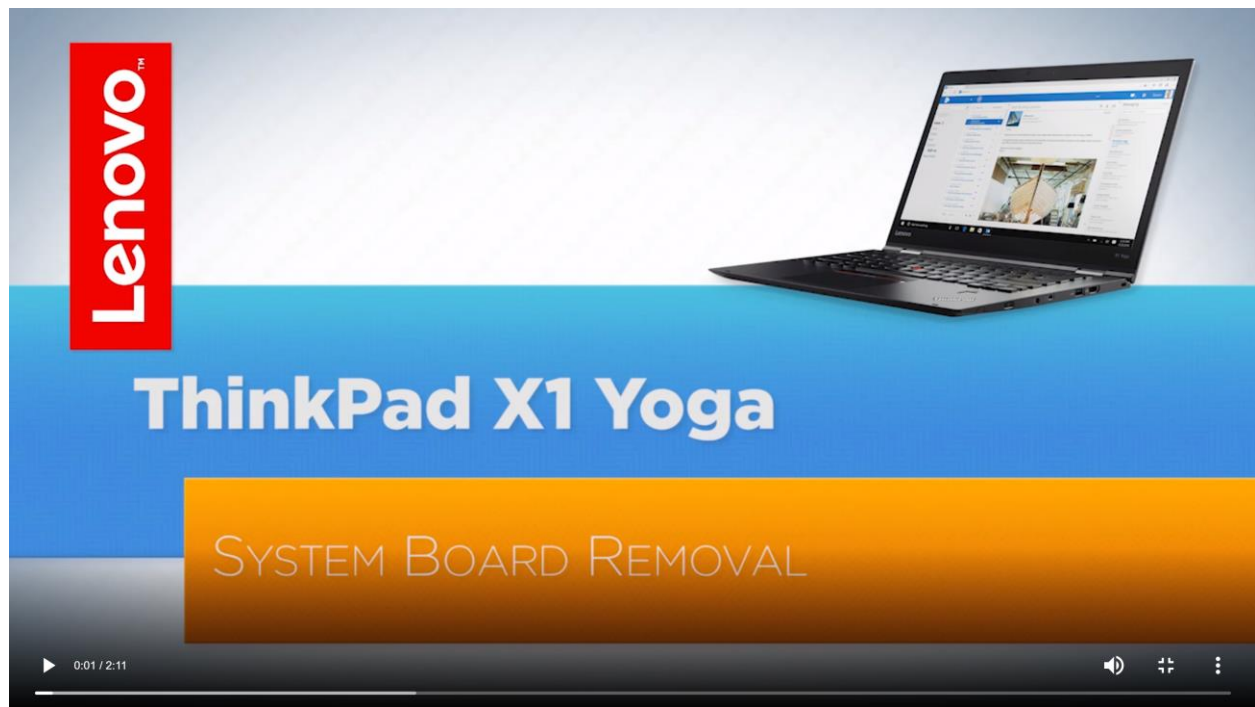
See, e.g., ThinkPad Photos.

130. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a central processing unit disposed in the base. For example:

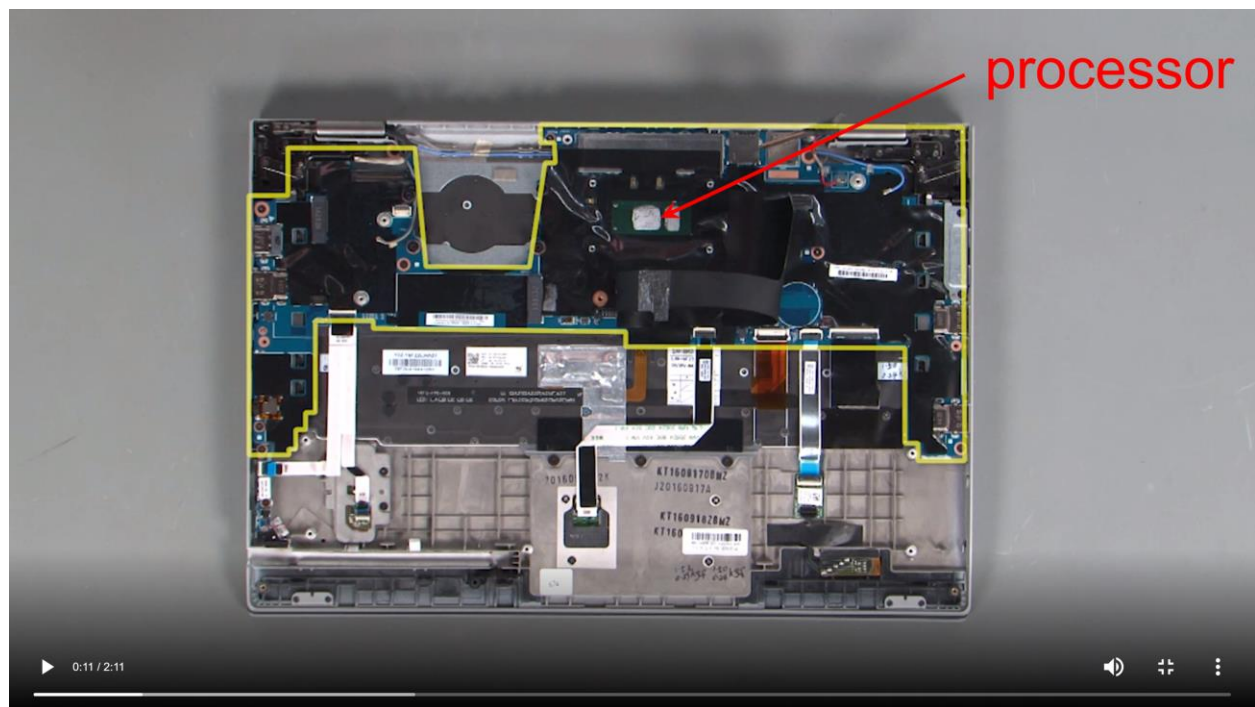
Processor ⓘ

8th Generation Intel® Core™ i5-8250U Processor (1.60 GHz, up to 3.40 GHz with Turbo Boost, 4 Cores, 8 Threads, 6 MB Cache)

See, e.g., ThinkPad Webpage.



See, e.g., https://download.lenovo.com/lts/RTPW1610/FOF/RTPW1610-X1Yoga_REM_FRU_14_SystemBoard.mp4.



See, e.g., https://download.lenovo.com/lts/RTPW1610/FOF/RTPW1610-X1Yoga_REM_FRU_14_SystemBoard.mp4 at 0:11 (annotations added).

131. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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 surface of the display component faces the first surface of the base. For example:



See, e.g., ThinkPad Yoga Video at 0:38-0:42.



Notebook mode



Stand mode



Tent mode

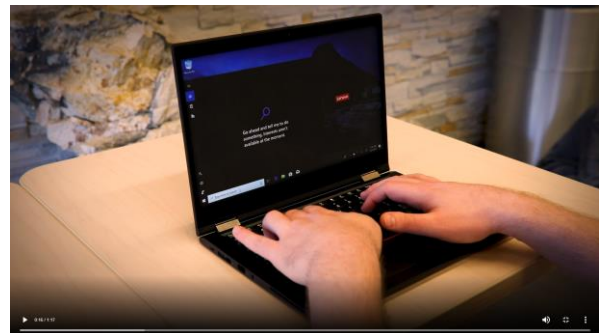


Tablet mode

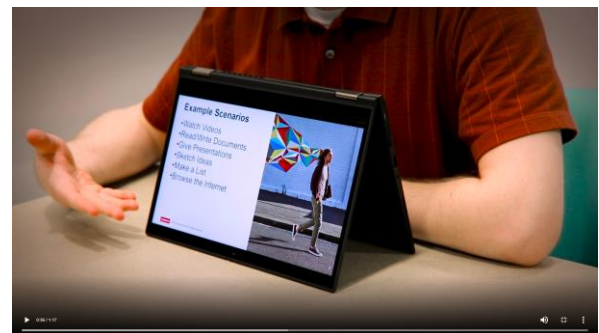
See ThinkPad User Guide, p. 29.

132. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) include an orientation sensor configured to generate orientation information indicative of an orientation of at least part of the portable computer and 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, display content in a first orientation when the current display mode is the first mode or the third mode, display content in a second orientation that is rotated 180 degrees relative to the first orientation when the current display mode is the second mode, and enlarge at least some

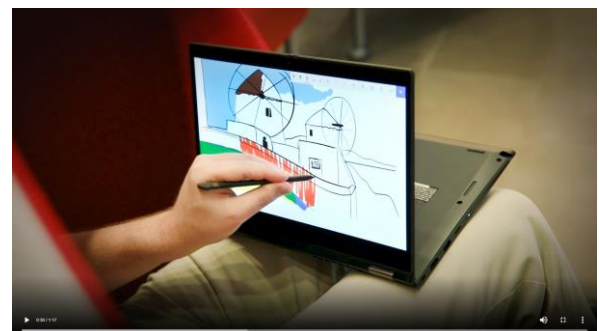
computer content displayed on the display screen when the current display mode transitions from the first mode to the second mode.



See, e.g., ThinkPad Yoga Modes at 0:14-0:23.



See, e.g., ThinkPad Yoga Modes at 0:32-0:36.



See, e.g., ThinkPad Yoga Modes at 0:24-0:31.

Indirect and Willful Infringement

133. Lenovo has known that its Accused Products infringe the '154 patent since at least the filing of this Complaint.

134. Lenovo has known or should have known since at least the filing of this Complaint that end users, importers, distributors, retailers, repair and service technicians, Lenovo employees and contractors, and other users of the Accused Products are infringing the '154 patent at least because Lenovo has known that it is infringing the '154 patent.

135. Lenovo has actively and knowingly induced, and is actively and knowingly inducing, infringement of one or more claims of the '154 patent, at least by inducing end users, repair and service technicians, Lenovo employees and contractors, and others to use the Accused Products in an infringing manner. Lenovo instructs its customers by way of manuals or product documentation to infringe the asserted claims by using the Accused Products. For example, in the ThinkPad HTML User Guide Lenovo instructs users that the 3rd Generation ThinkPad X1 Yoga “can be opened to any angle within a range of up to 360 degrees” and that “[b]y rotating the display to different angle, your computer features the following four operating modes”:



Notebook mode



Stand mode



Tent mode



Tablet mode

See ThinkPad HTML User Guide, Using Your ThinkPad / Using your computer / Operating modes.

136. Lenovo has had knowledge of the '154 patent and its infringement of the '154 patent since at least the filing of this Complaint. Lenovo's inducement of infringement of the '154 patent has been done with specific intent to infringe that patent.

137. Lenovo has contributed, and continues to contribute, to the infringement of one or more claims of the '154 patent by offering to sell, selling, and/or importing into the United States a component of the Accused Products, or a material or apparatus for use in practicing a process claimed in the '154 patent, that constitutes a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement of the '154 patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

138. Lenovo's infringement of the '154 patent has been willful since at least the filing of this Complaint, and its ongoing infringement of the '154 patent continues to be willful. Lenovo has chosen to manufacture, offer to sell and/or sell the Accused Products, even after LiTL's notice, knowing that such products would infringe the '154 patent.

139. The foregoing description of Lenovo'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.

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

141. Lenovo's infringement of the '154 patent has damaged and continues to damage LiTL in an amount yet to be determined, of at least a reasonable royalty.

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

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

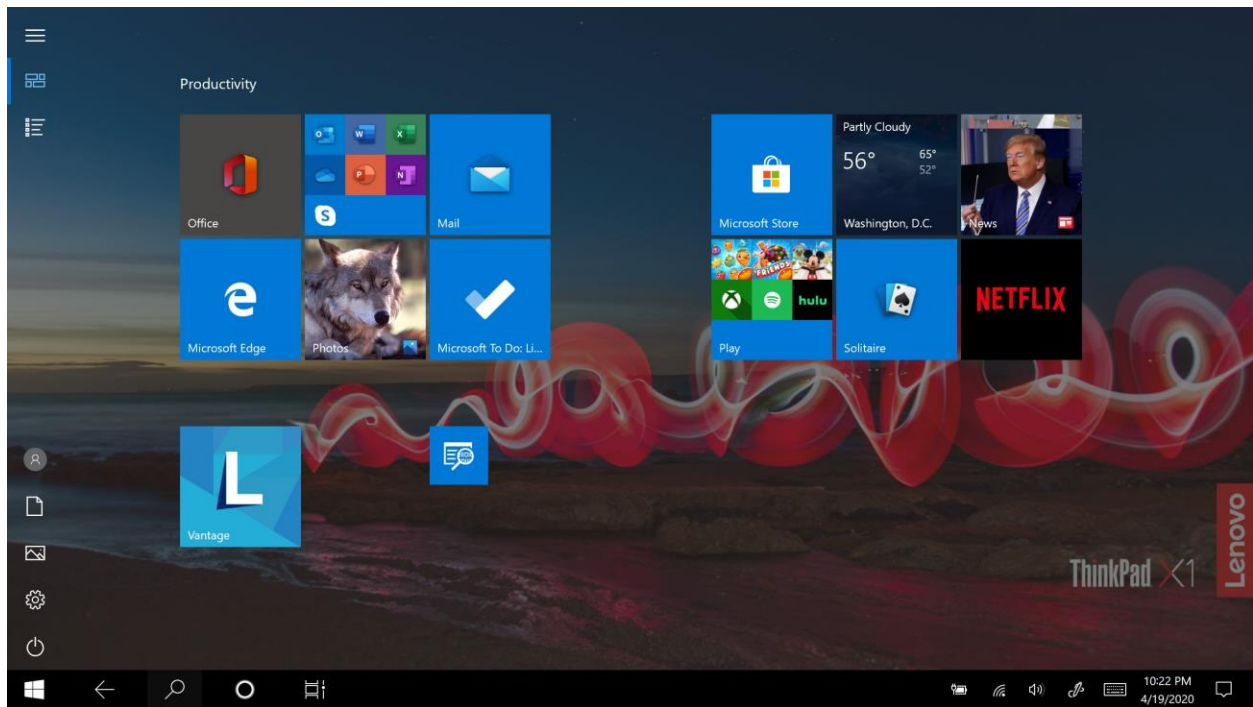
143. Lenovo has infringed and continues to infringe, directly and/or indirectly, literally and/or equivalently, one or more claims of the '715 patent, including at least claim 1, by making,

using, selling, offering for sale in, and/or importing into, the United States certain computing devices with multiple display modes, including at least the Accused Products.

144. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) include a customized user interface to display computer content on a display component of a computer system including a keyboard. For example:



See, e.g., ThinkPad Photos, caption: Lenovo ThinkPad X1 Yoga (3rd Gen) front view with Windows 10 Pro.



Screenshot from 3rd Generation ThinkPad X1 Yoga, home screen in tablet mode.

145. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) include a user interface comprising: at least one processor operatively connected to a memory of the computer system. For example:

Processor ⓘ

8th Generation Intel® Core™ i5-8250U Processor (1.60 GHz, up to 3.40 GHz with Turbo Boost, 4 Cores, 8 Threads, 6 MB Cache)

Operating System ⓘ

Windows 10 Pro 64

Display Type ⓘ

14.0" FHD (1920 x 1080) IPS anti-reflective, anti-smudge, touchscreen, 300 nits

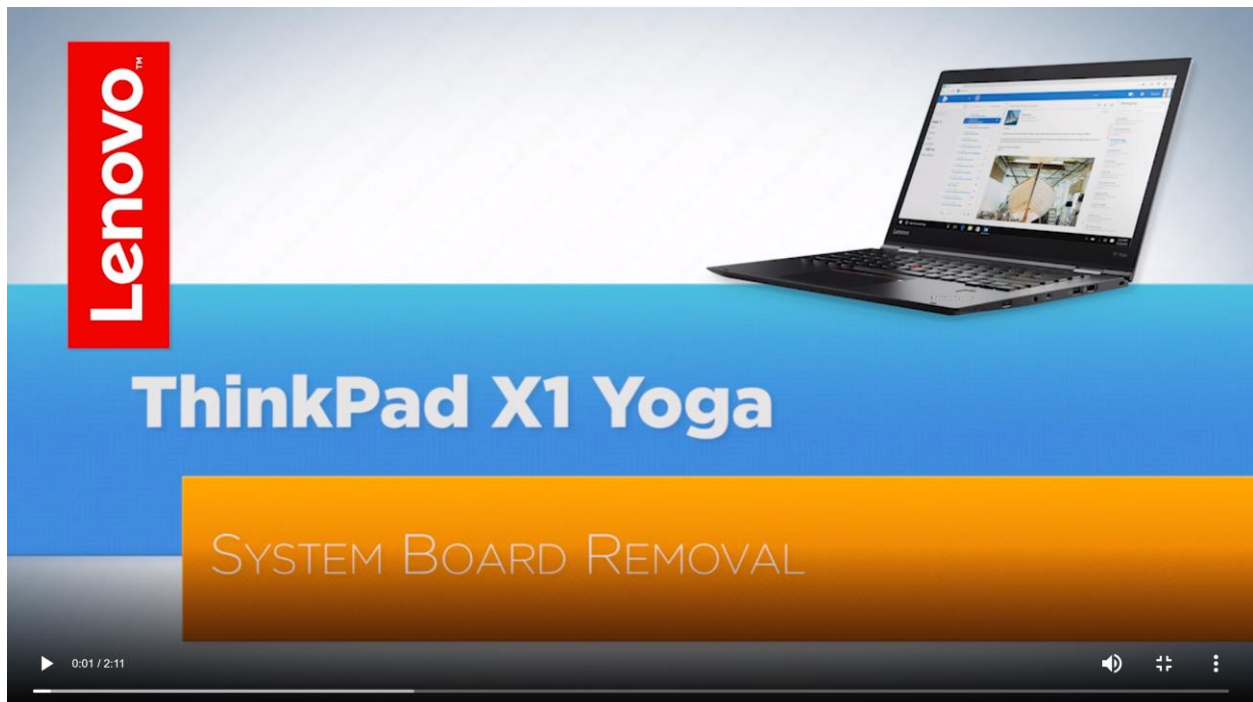
Memory ⓘ

8 GB LPDDR3 2133MHz (Soldered)

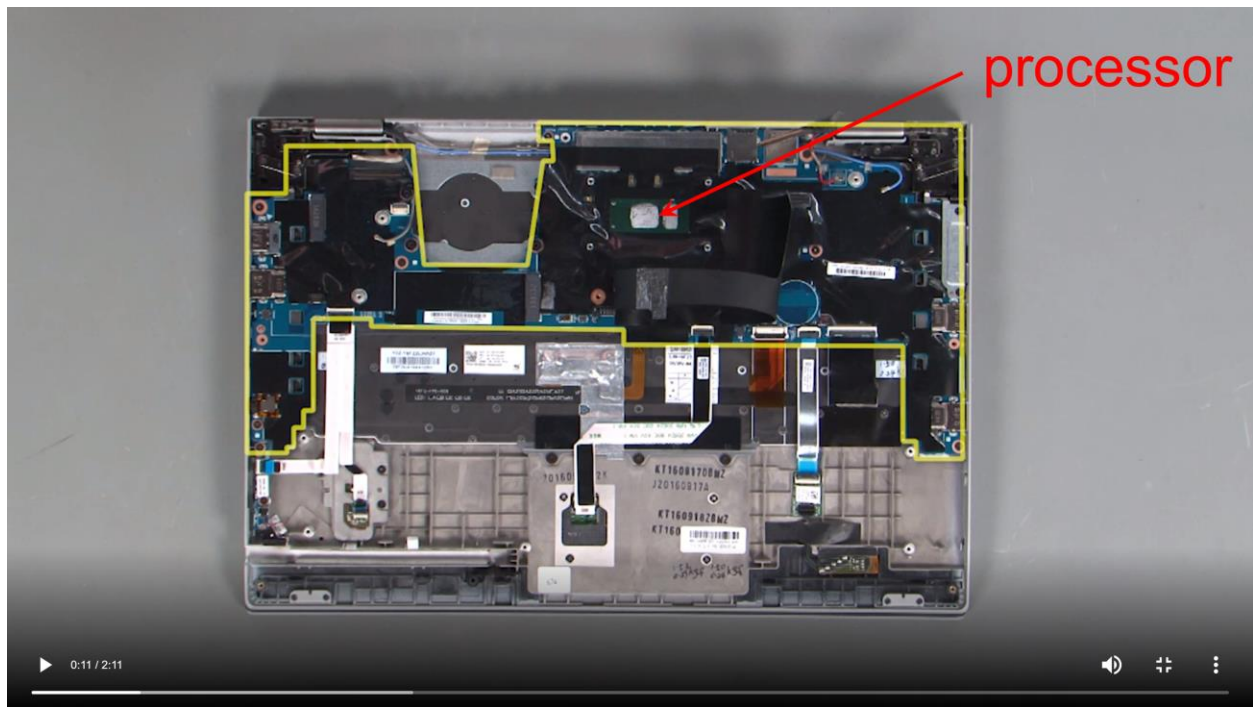
Hard Drive ⓘ

512 GB PCIe SSD

See, e.g., ThinkPad Webpage.



See, e.g., https://download.lenovo.com/lts/RTPW1610/FOF/RTPW1610-X1Yoga_REM_FRU_14_SystemBoard.mp4.



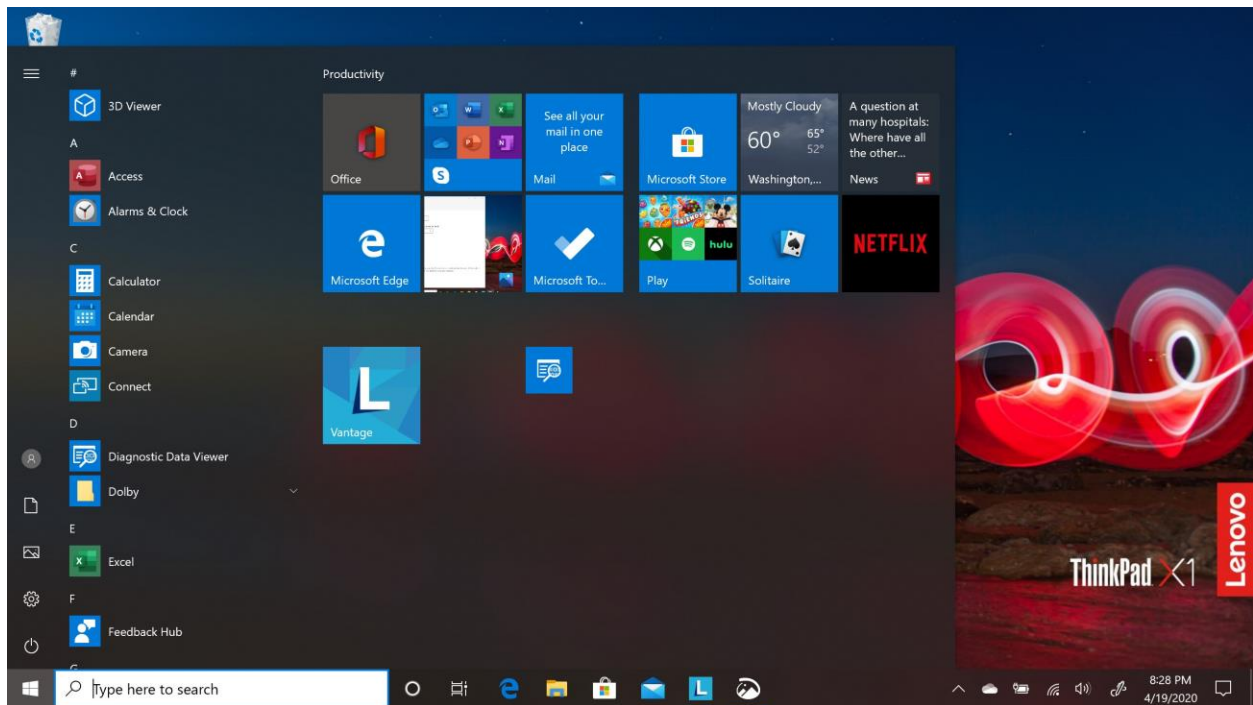
See, e.g., https://download.lenovo.com/lts/RTPW1610/FOF/RTPW1610-X1Yoga_REM_FRU_14_SystemBoard.mp4 at 0:11 (annotations added).

146. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) 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:

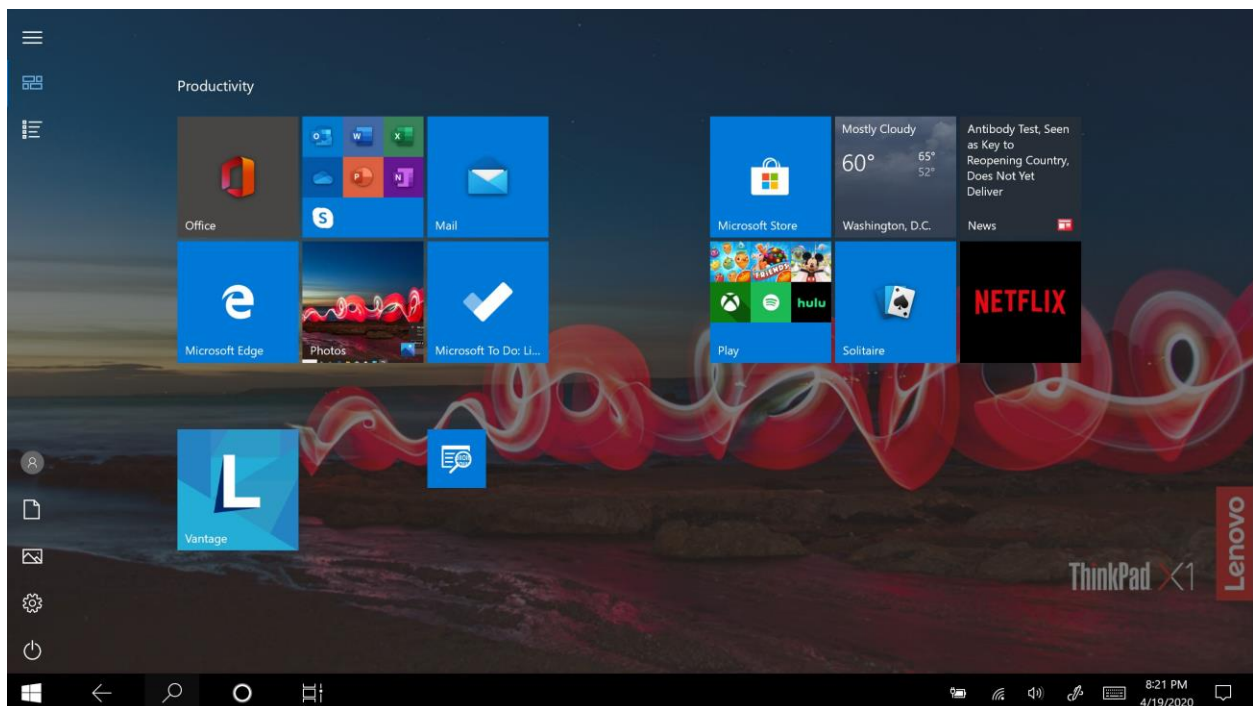


See, e.g., ThinkPad Photos, caption: Lenovo ThinkPad X1 Yoga (3rd Gen) front view with Windows 10 Pro.

147. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a graphical user interface configured to: display a plurality of views of a plurality of visual representations of computer content. For example, the 3rd Generation ThinkPad X1 Yoga is configured to display a home screen in laptop mode and a home screen in tablet mode:

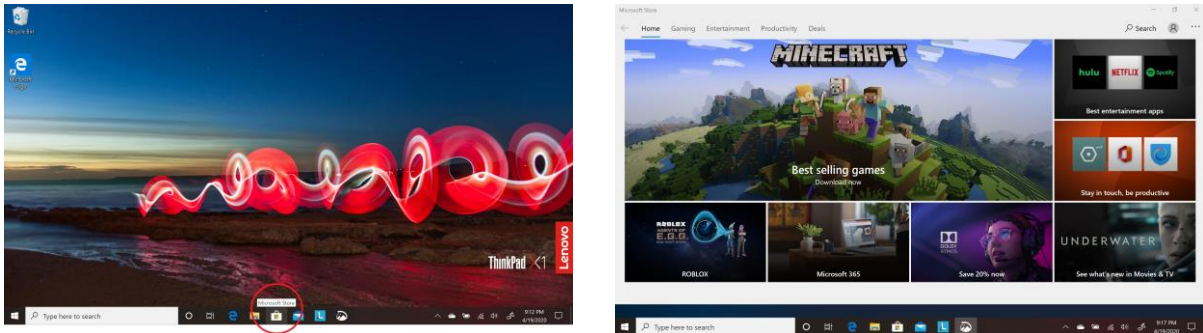


Screenshot from 3rd Generation ThinkPad X1 Yoga, home screen in laptop mode.

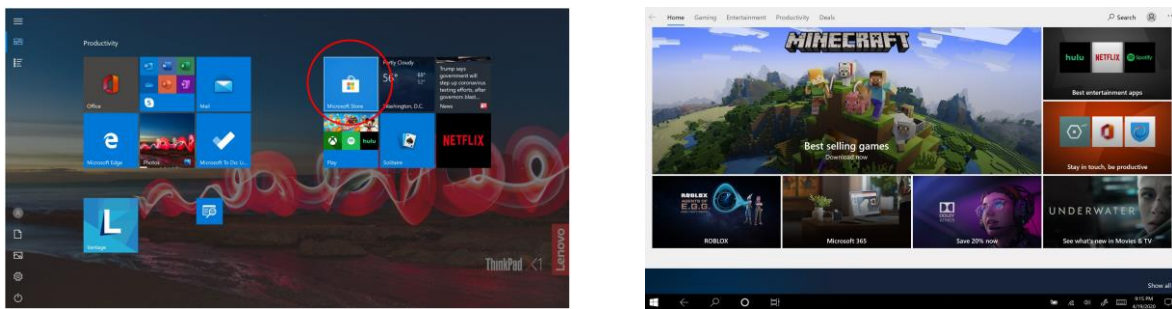


Screenshot from 3rd Generation ThinkPad X1 Yoga, home screen in tablet mode.

148. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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:



Screenshots from 3rd Generation ThinkPad X1 Yoga, Microsoft Store selected in laptop mode.



Screenshots from 3rd Generation ThinkPad X1 Yoga, Microsoft Store selected in tablet mode.

149. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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 is operable in notebook mode and inoperable in tent mode:

Your computer features the following four YOGA modes. You can switch among different modes according to your preference.

Note: The keyboard and the pointing devices are automatically disabled in the stand mode, tent mode, and tablet mode. Use the touch screen to control your computer instead.



Notebook mode



Stand mode



Tent mode



Tablet mode

See ThinkPad User Guide, pp. 28-29.

Indirect and Willful Infringement

150. Lenovo has known that its Accused Products infringe the '715 patent since at least the filing of this Complaint.

151. Lenovo has known or should have known since at least the filing of this Complaint that end users, importers, distributors, retailers, repair and service technicians, Lenovo employees and contractors, and other users of the Accused Products are infringing the '715 patent at least because Lenovo has known that it is infringing the '715 patent.

152. Lenovo has actively and knowingly induced, and is actively and knowingly inducing, infringement of one or more claims of the '715 patent, at least by inducing end users, repair and service technicians, Lenovo employees and contractors, and others to use the Accused Products in an infringing manner. Lenovo instructs such users by way of manuals or product documentation to infringe the asserted claims by using the Accused Products. For example, in the ThinkPad HTML User Guide Lenovo instructs users that the 3rd Generation ThinkPad X1 Yoga “can be opened to any angle within a range of up to 360 degrees,” that “[b]y rotating the display to different angle, your computer features the following four operating modes,” and that “[t]he keyboard and the pointing devices are automatically disabled in the stand mode, tent mode, and tablet mode”:



Notebook mode



Stand mode



Tent mode



Tablet mode

See ThinkPad HTML User Guide, Using Your ThinkPad / Using your computer / Operating modes.

153. Lenovo has had knowledge of the '715 patent and its infringement of the '715 patent since at least the filing of this Complaint. Lenovo's inducement of infringement of the '715 patent has been done with specific intent to infringe that patent.

154. Lenovo has contributed, and continues to contribute, to the infringement of one or more claims of the '715 patent by offering to sell, selling, and/or importing into the United States a component of the Accused Products, or a material or apparatus for use in practicing a process

claimed in the '715 patent, that constitutes a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement of the '715 patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

155. Lenovo's infringement of the '715 patent has been willful since at least the filing of this Complaint, and its ongoing infringement of the '715 patent continues to be willful. Lenovo has chosen to manufacture, offer to sell, and/or sell the Accused Products, even after LiTL's notice, knowing that such products would infringe the '715 patent.

156. The foregoing description of Lenovo'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.

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

158. Lenovo's infringement of the '715 patent has damaged and continues to damage LiTL in an amount yet to be determined, of at least a reasonable royalty.

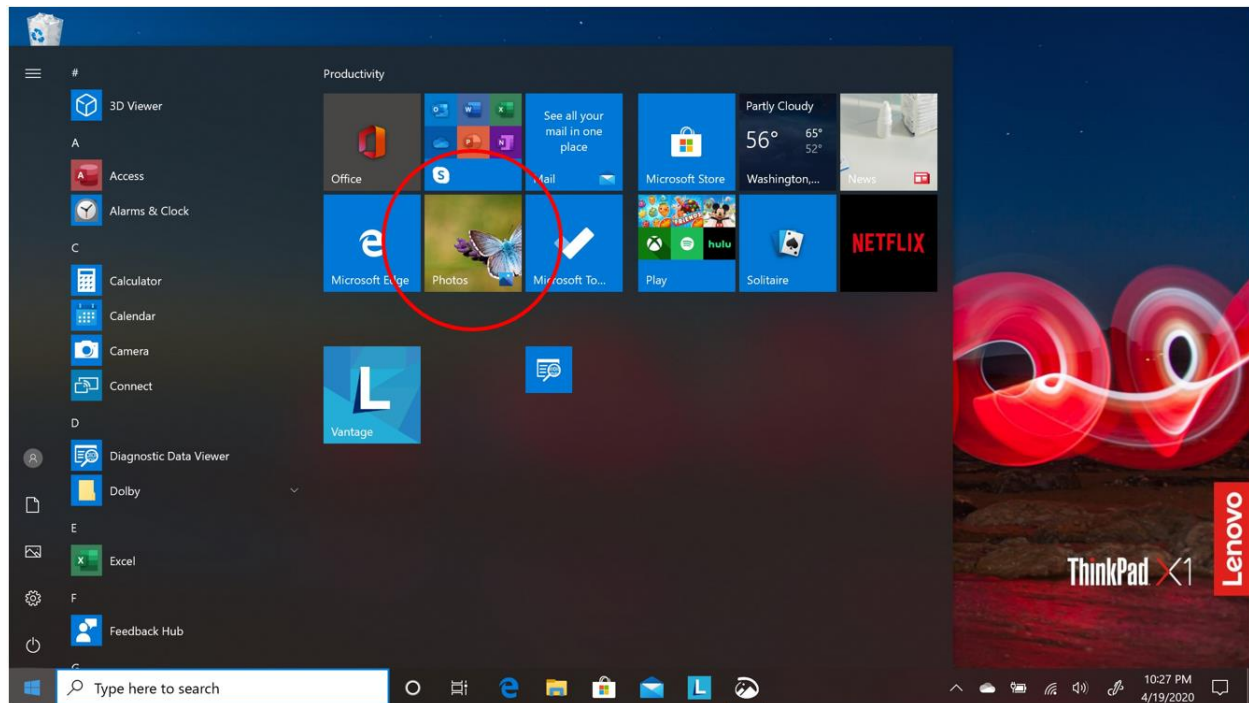
COUNT V
(Infringement of U.S. Patent No. 8,612,888)

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

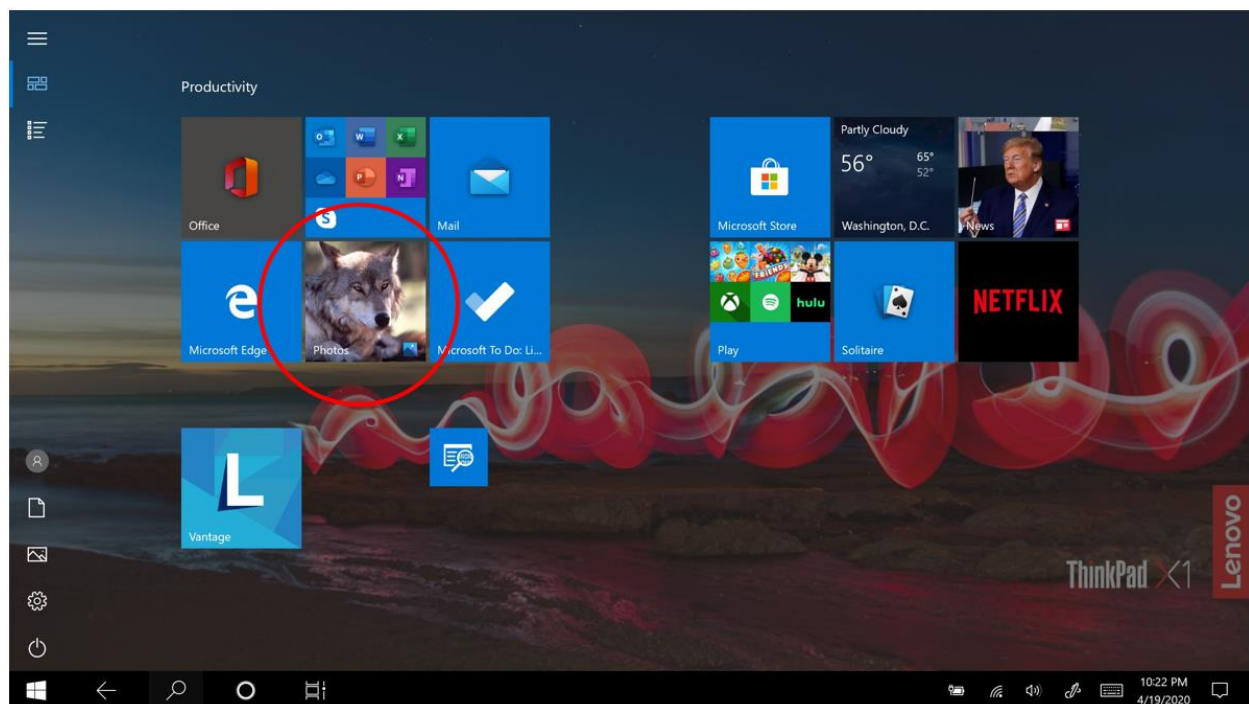
160. Lenovo has infringed and continues to infringe, directly and/or indirectly, literally and/or equivalently, one or more claims of the '888 patent, including at least claim 27, by making, using, selling, offering for sale in, and/or importing into, the United States certain computing devices with multiple display modes, including at least the Accused Products.

161. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) include a system for accessing and managing digital media libraries with a plurality of selectable I/O

profiles. For example, the 3rd Generation ThinkPad X1 Yoga includes the Microsoft Photos app, which can be accessed in tablet mode and in laptop mode:



Screenshot from 3rd Generation ThinkPad X1 Yoga, Microsoft Photos (circled) in laptop mode.

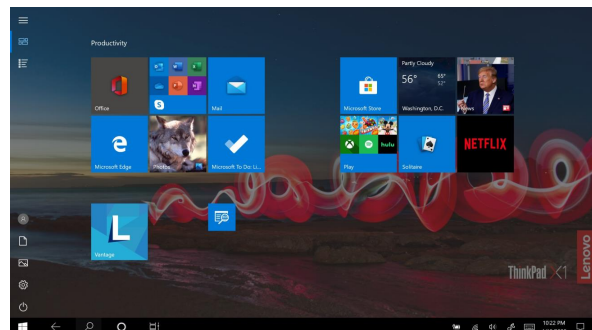


Screenshot from 3rd Generation ThinkPad X1 Yoga, Microsoft Photos (circled) in tablet mode.

162. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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 3rd Generation ThinkPad X1 Yoga includes a laptop mode and a tablet mode:



Laptop Mode



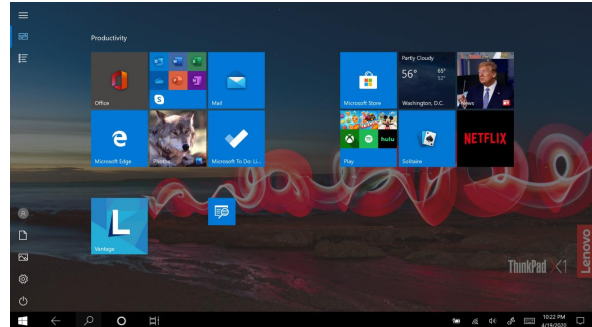
Tablet Mode

Screenshot from 3rd Generation ThinkPad X1 Yoga, home screen in laptop and tablet modes.

163. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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 3rd Generation ThinkPad X1 Yoga is configured to transition between a plurality of views in response to selection of laptop and tablet modes.



Laptop Mode



Tablet Mode

Screenshot from 3rd Generation ThinkPad X1 Yoga, home screen in laptop and tablet modes.

164. Selecting the I/O profile within the Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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 3rd Generation ThinkPad X1 Yoga 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 a tent mode.

Get to know YOGA modes (for X1 Yoga only)

Your computer display can be rotated to any angle up to 360 degrees.

Attention: Do not rotate the computer display with too much force, or apply too much force to the upper-right or upper-left corner of the computer display. Otherwise, the computer display or hinges might get damaged.



Your computer features the following four YOGA modes. You can switch among different modes according to your preference.

ThinkPad User Guide, p. 28.

Your computer features the following four YOGA modes. You can switch among different modes according to your preference.

Note: The keyboard and the pointing devices are automatically disabled in the stand mode, tent mode, and tablet mode. Use the touch screen to control your computer instead.



Notebook mode



Stand mode



Tent mode



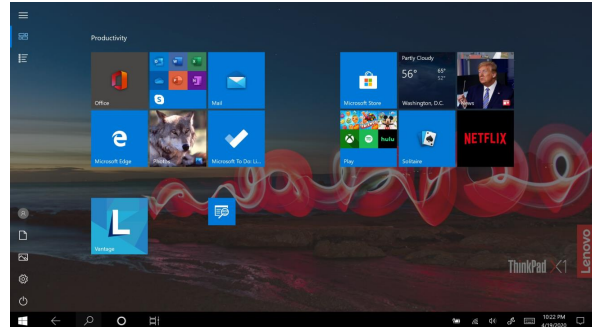
Tablet mode

See ThinkPad User Guide, pp. 28-29.

165. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) include a view selector component configured to transition between the plurality of views in response to activation. For example, when powered on the 3rd Generation ThinkPad X1 Yoga is configured to transition between a laptop mode and a tablet mode:



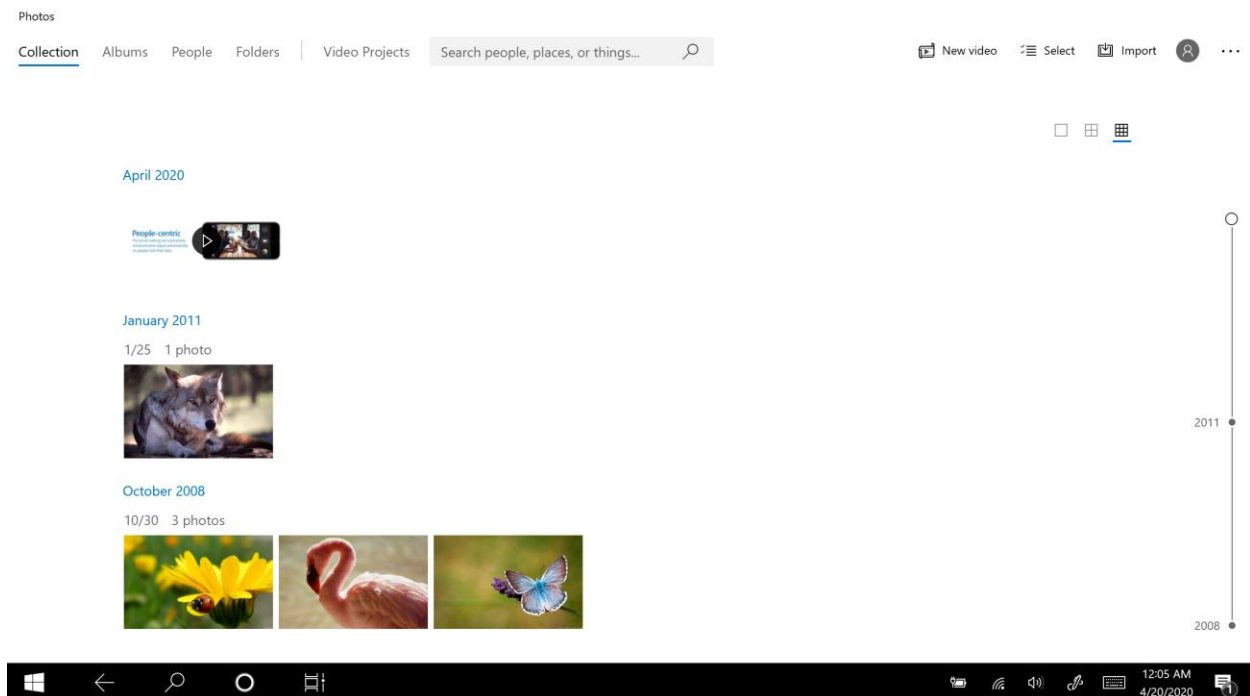
Laptop Mode



Tablet Mode

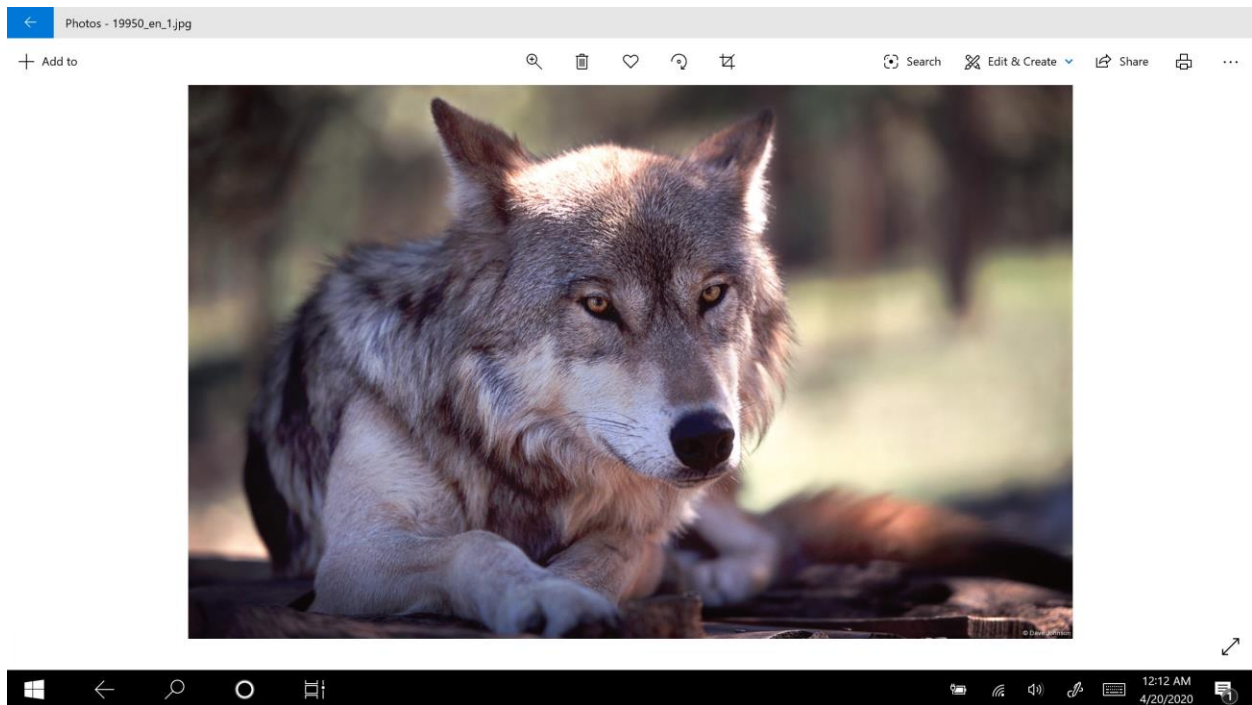
Screenshot from 3rd Generation ThinkPad X1 Yoga, home screen in laptop and tablet modes.

166. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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 3rd Generation ThinkPad X1 Yoga includes the Microsoft Photos app, which is configured to store an association between thumbnail previews of content and digital media content:



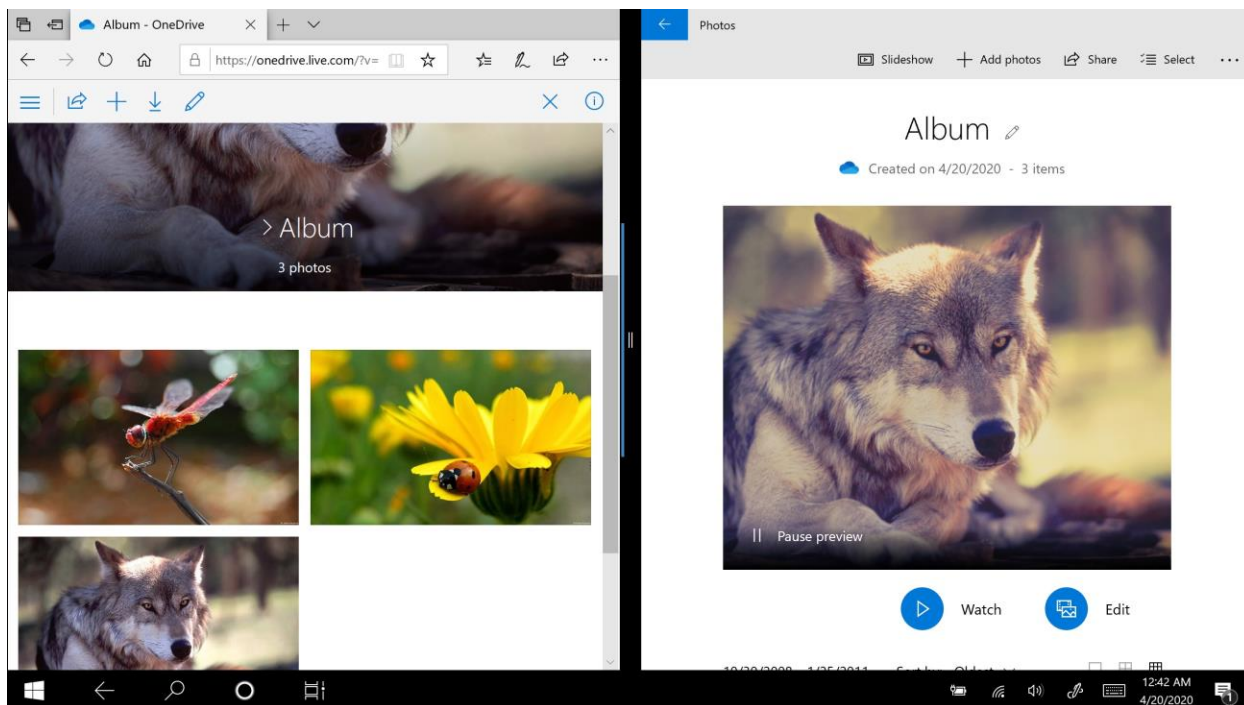
Screenshot from 3rd Generation ThinkPad X1 Yoga, Microsoft Photos app.

167. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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:



Screenshot from 3rd Generation ThinkPad X1 Yoga, Microsoft Photos app.

168. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) 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 3rd Generation ThinkPad X1 Yoga 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):



Screenshot from 3rd Generation ThinkPad X1 Yoga, OneDrive album and Microsoft Photos app.

Indirect and Willful Infringement

169. Lenovo has known that its Accused Products infringe the '888 patent since at least the filing of this Complaint.

170. Lenovo has known or should have known since at least the filing of this Complaint that end users, importers, distributors, retailers, repair and service technicians, Lenovo employees and contractors, and other users of the Accused Products are infringing the '888 patent at least because Lenovo has known that it is infringing the '888 patent.

171. Lenovo has actively and knowingly induced, and is actively and knowingly inducing, infringement of one or more claims of the '888 patent, at least by inducing end users, repair and service technicians, Lenovo employees and contractors, and others to use the Accused Products in an infringing manner. For example, Lenovo instructs such users by way of manuals

or product documentation to infringe the asserted claims by using the Accused Products. *See, e.g.,* <https://pcsupport.lenovo.com/us/en/solutions/msh500092>.

172. Lenovo has had knowledge of the '888 patent and its infringement of the '888 patent since at least the filing of this Complaint. Lenovo's inducement of infringement of the '888 patent has been done with specific intent to infringe that patent.

173. Lenovo has contributed, and continues to contribute, to the infringement of one or more claims of the '888 patent by offering to sell, selling, and/or importing into the United States a component of the Accused Products, or a material or apparatus for use in practicing a process claimed in the '888 patent, that constitutes a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement of the '888 patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

174. Lenovo's infringement of the '888 patent has been willful since at least the filing of this Complaint, and its ongoing infringement of the '888 patent continues to be willful. Lenovo has chosen to manufacture, offer to sell and/or sell the Accused Products, even after LiTL's notice, knowing that such products would infringe the '888 patent.

175. The foregoing description of Lenovo'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.

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

177. Lenovo's infringement of the '888 patent has damaged and continues to damage LiTL in an amount yet to be determined, of at least a reasonable royalty.

COUNT VI
(Infringement of U.S. Patent No. 8,577,957)

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

179. Lenovo has infringed and continues to infringe, directly and/or indirectly, literally and/or equivalently, one or more claims of the '957 patent, including at least claim 19, by making, using, selling, offering for sale in, and/or importing into, the United States certain computing devices with multiple display modes, including at least the Accused Products.

180. The Accused Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) include a streamlined computer device, the device comprising: at least one processor operatively connected to a memory. For example:

Processor ⓘ

8th Generation Intel® Core™ i5-8250U Processor (1.60 GHz, up to 3.40 GHz with Turbo Boost, 4 Cores, 8 Threads, 6 MB Cache)

Operating System ⓘ

Windows 10 Pro 64

Display Type ⓘ

14.0" FHD (1920 x 1080) IPS anti-reflective, anti-smudge, touchscreen, 300 nits

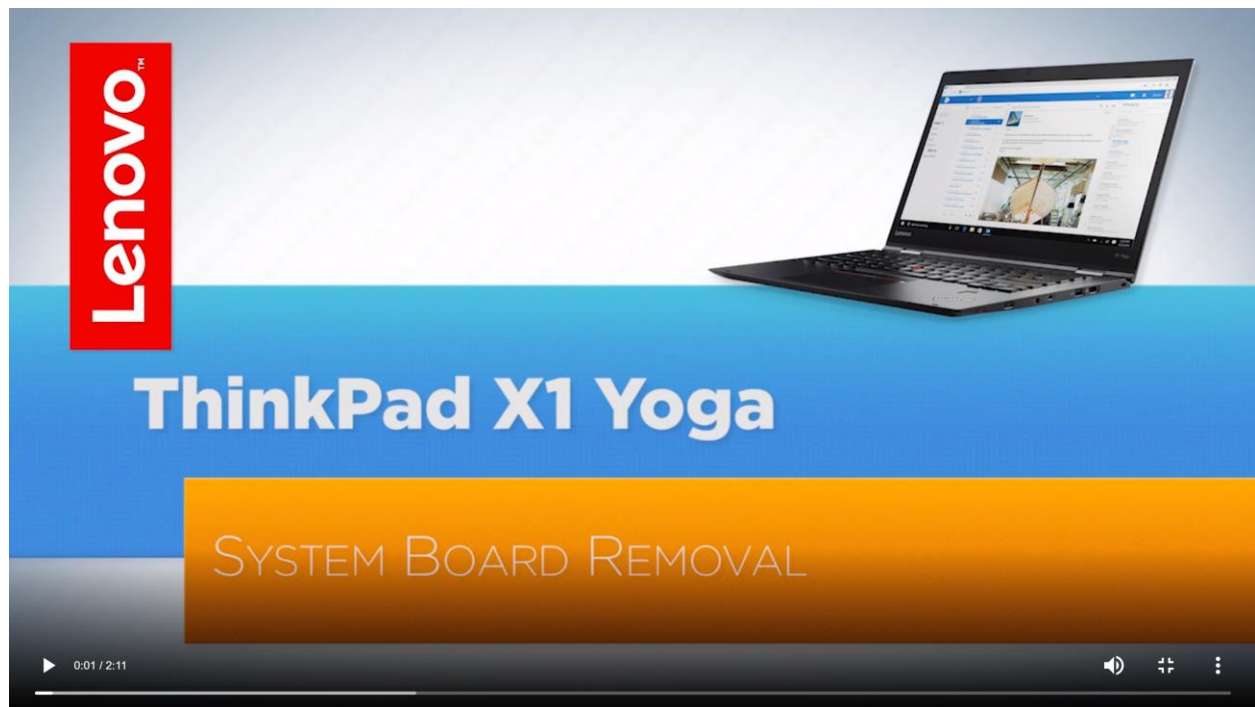
Memory ⓘ

8 GB LPDDR3 2133MHz (Soldered)

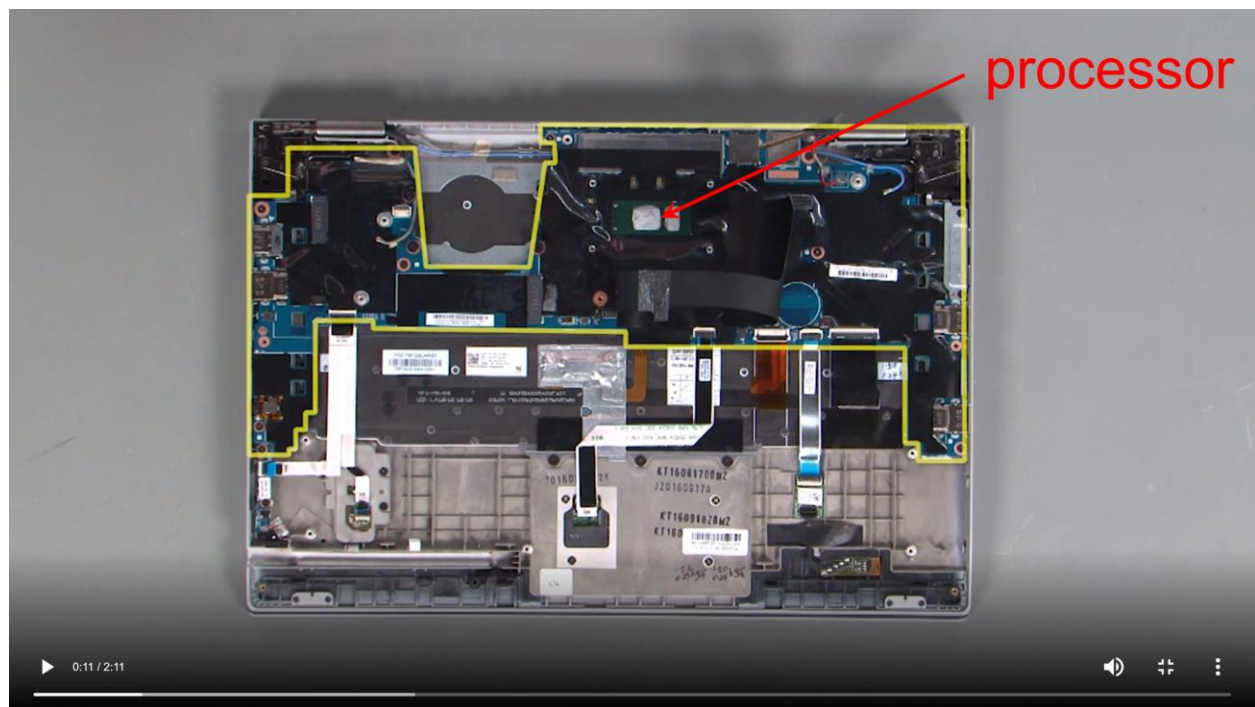
Hard Drive ⓘ

512 GB PCIe SSD

See, e.g., ThinkPad Webpage.

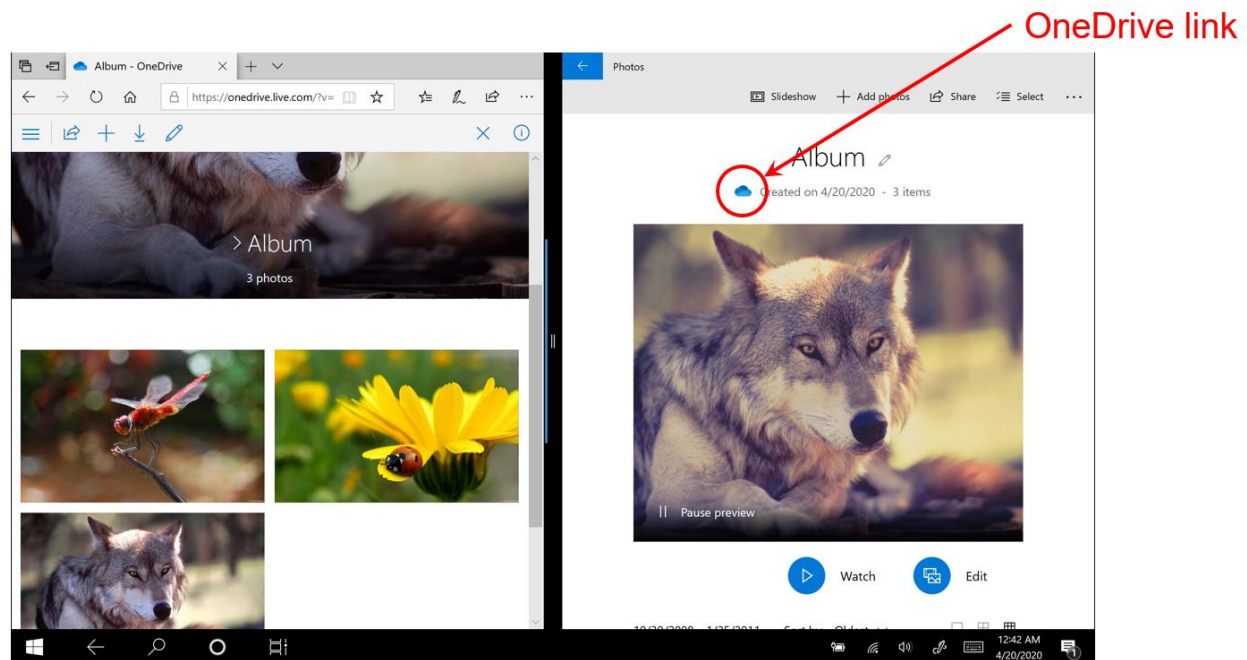


See, e.g., https://download.lenovo.com/lts/RTPW1610/FOF/RTPW1610-X1Yoga_REM_FRU_14_SystemBoard.mp4.



See, e.g., https://download.lenovo.com/lts/RTPW1610/FOF/RTPW1610-X1Yoga_REM_FRU_14_SystemBoard.mp4 at 0:11 (annotations added).

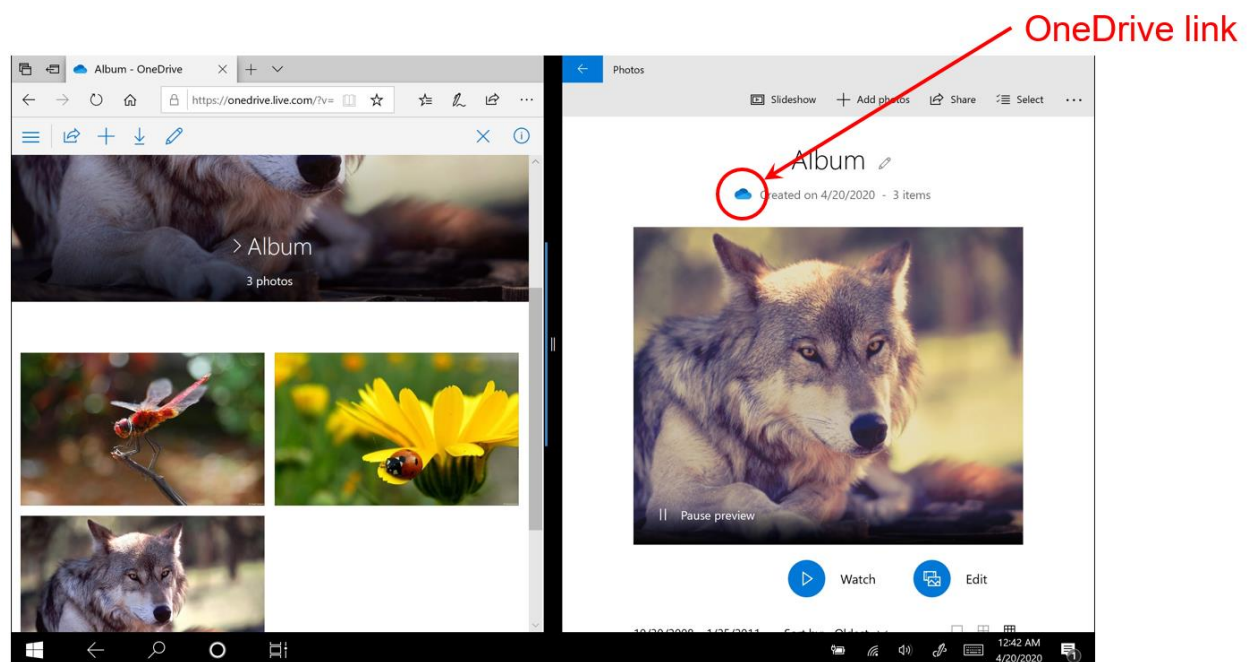
181. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a processor that when executing is configured to cause the device to: receive electronic content hosted by a server system; render electronic content to a user in a graphical user interface; receive selection through the graphical user interface, by the user, of at least one executable operation provided by the server system within the electronic content; determine that the at least one executable operation performs a local access operation, and transform the at least one executable operation into a remote access operation. For example, the 3rd Generation ThinkPad X1 Yoga includes the Microsoft Photos app, which is configured to provide access to digital media albums stored OneDrive by clicking on a OneDrive link:



Screenshot from 3rd Generation ThinkPad X1 Yoga, OneDrive album and Microsoft Photos app.

182. The Accused Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a transforming that includes: identifying at least one characteristic of the at least one executable

operation; accessing a profile to retrieve information on at least one available remote services responsive to the at least one identified characteristics of the executable operation; selecting an available remote service from the at least one available remote service; retrieving the service access information for the selected remote service; wherein transforming is executed based on the at least one characteristic of the at least one executable operation and the service access information; and transmit the remote access operation to the server system. For example, clicking on a OneDrive album link in the Microsoft Photos app accesses OneDrive user profile information in order to access content on a user's OneDrive album:



Screenshot from 3rd Generation ThinkPad X1 Yoga, OneDrive album and Microsoft Photos app.

Before the Filing of This Complaint, Lenovo Knew or Should Have Known of the '957 Patent and Knew or Should Have Known that Lenovo Products Infringe the '957 Patent

183. On November 5, 2013, the '957 patent issued from U.S. Patent Application No. 12/416,503, which had earlier published on December 3, 2009 as U.S. Patent Publication No. 2009/0300511 ("the LiTL '511 publication").

184. Since at least 2017 Lenovo Beijing has had knowledge of the LiTL '511 publication.

185. On March 14, 2017, the Chinese Intellectual Property Office issued a search report to Lenovo Beijing identifying the LiTL '511 publication in connection with Lenovo's Chinese Patent Application No. 201500267712.

186. Lenovo Beijing has extensive experience with intellectual property. Consistent with Lenovo's sophistication with IP matters, on information and belief, Lenovo Beijing was aware by 2017 of the family of LiTL patents and applications to which the '957 patent belongs.

187. Since at least 2017 Lenovo Beijing knew or should have known, or at a minimum acted with willful blindness to the fact, that its Accused Products infringe one or more claims of the '957 patent based on at least the following:

- the Chinese Intellectual Property Office's citation of the LiTL '511 publication to Lenovo Beijing during prosecution of Lenovo's own patent application;
- Lenovo Beijing is a sophisticated actor with respect to intellectual property; and
- Lenovo Beijing knew or should have known, or was willfully blind to the fact, that the LiTL '511 publication had issued as the '957 patent.

188. In addition, Lenovo has known that its Accused Products infringe one or more claims of the '957 patent since at least the filing of this Complaint.

Indirect and Willful Infringement

189. Lenovo has known that its Accused Products infringe the '957 patent since at least the filing of this Complaint.

190. Lenovo has known or should have known since at least the filing of this Complaint that end users, importers, distributors, retailers, repair and service technicians, Lenovo

employees and contractors, and other users of the Accused Products are infringing the '957 patent at least because Lenovo has known that it is infringing the '957 patent.

191. Lenovo has actively and knowingly induced, and is actively and knowingly inducing, infringement of one or more claims of the '957 patent, at least by inducing end users, repair and service technicians, Lenovo employees and contractors, and others to use the Accused Products in an infringing manner. For example, Lenovo instructs such users by way of manuals or product documentation to infringe the asserted claims by using the Accused Products. *See, e.g.,* <https://support.lenovo.com/us/en/solutions/msh500022>.

192. Lenovo has had knowledge of the '957 patent and its infringement of the '957 patent since at least the filing of this Complaint. Lenovo's inducement of infringement of the '957 patent has been done with specific intent to infringe that patent.

193. Lenovo has contributed, and continues to contribute, to the infringement of one or more claims of the '957 patent by offering to sell, selling, and/or importing into the United States a component of the Accused Products, or a material or apparatus for use in practicing a process claimed in the '957 patent, that constitutes a material part of the inventions, knowing the same to be especially made or especially adapted for use in an infringement of the '957 patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

194. Lenovo Beijing's infringement of the '957 patent has been willful since at least 2017. Lenovo's ongoing infringement of the '957 patent continues to be willful. Lenovo has chosen to manufacture, offer to sell and/or sell the Accused Products, even after LiTL's notice, knowing that such products would infringe the '957 patent.

195. The foregoing description of Lenovo'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.

196. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Lenovo's infringement of the '957 patent.

197. Lenovo's infringement of the '957 patent has damaged and continues to damage LiTL in an amount yet to be determined, of at least a reasonable royalty.

REQUEST FOR RELIEF

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

- a. Declaring that Lenovo has infringed the '688, '844, '154, '715, '888 and '957 patents;
- b. Granting a permanent injunction, enjoining Lenovo and its officers, agents, servants, employees, attorneys, and all other persons acting in concert or participation with them, from further infringement of the '688, '844, '154, '715, '888 and '957 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 Lenovo'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 Lenovo'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 Lenovo'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: May 22, 2020

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