IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LITL LLC, Plaintiff, v. HP INC., Defendant.	Civil Action No. _____ **JURY TRIAL DEMANDED**

COMPLAINT

Plaintiff LiTL LLC ("Plaintiff" or "LiTL") brings this action for patent infringement against Defendant HP Inc. ("Defendant" or "HP").

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

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

EX-1018
Microsoft Inc. v. LiTL LLC

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

THE PARTIES

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

5. Defendant HP Inc. is a corporation organized under the laws of the State of Delaware, with a place of business at 1501 Page Mill Road, Palo Alto, California 94304.

JURISDICTION AND VENUE

6. 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).

7. This Court has personal jurisdiction over HP. HP is subject to general personal jurisdiction in the State of Delaware because it is incorporated in the State of Delaware.

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

FACTUAL BACKGROUND

LiTL's Patented Technologies

9. 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.

10. 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

11. 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

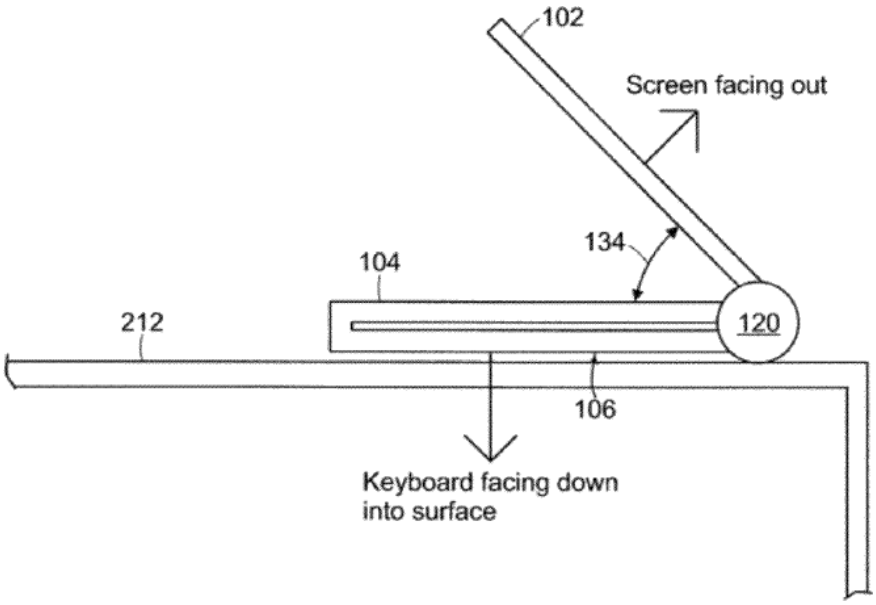
12. Rotating the webbook display into "easel mode" allows users to easily consume content from the Internet via a streamlined, intuitive interface.

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

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

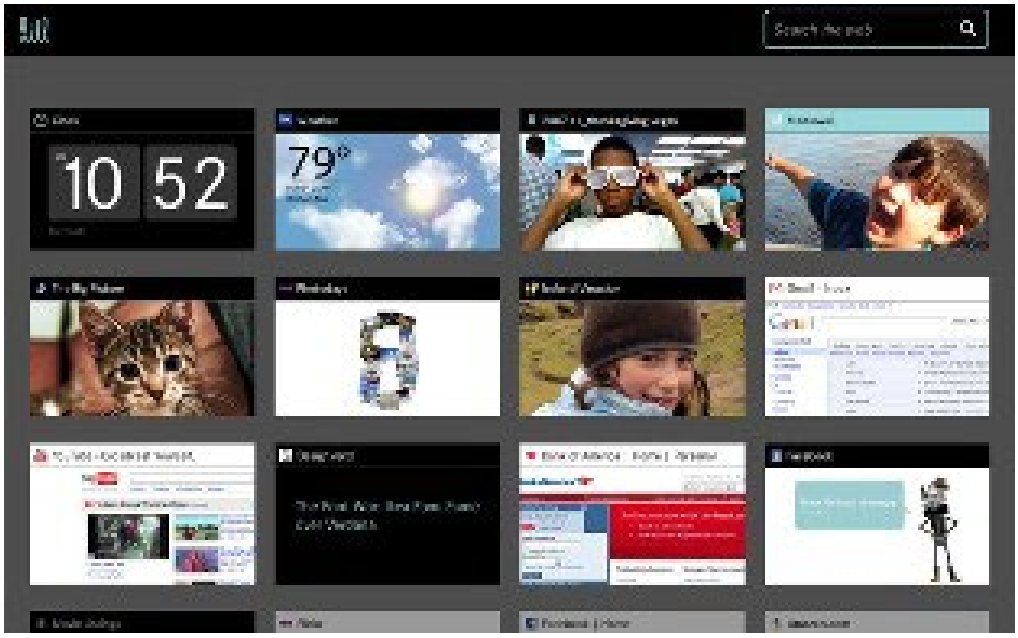
http://web.archive.org/web/20130420102239/http://litl.com/webbook/meet-webbook/more-fun.htm

14. 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.

15. 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

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

LiTL's Asserted Patents

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

18. 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 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.

19. 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.

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

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

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

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

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

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

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

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

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

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

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

31. Given the numerous patents directed to HP’s convertible laptops, the citations to the ’688 patent and corresponding published applications in HP’s own patent applications, on information and belief HP was aware of each of the Asserted Patents before the filing of this Complaint and knew that HP’s convertible design infringes the Asserted Patents.

HP’s Incorporation of LiTL’s Patented Technologies into Its Computing Devices

32. 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.

33. The infringing products include, but are not limited to, EliteBook x360 830 G5; EliteBook x360 830 G6; EliteBook x360 830 G7; EliteBook x360 830 G8; EliteBook x360 830 G9; EliteBook x360 1020 G2; EliteBook x360 1030 G2; EliteBook x360 1030 G3; EliteBook x360 1030 G4; EliteBook x360 1030 G7; EliteBook x360 1030 G8; EliteBook x360 1040 G5;

EliteBook x360 1040 G6; EliteBook x360 1040 G7; EliteBook x360 1040 G8; EliteBook x360 1040 G9; EliteBook x360 1040 G10; Elite Dragonfly G1; Elite Dragonfly G2; Elite Dragonfly G3; Elite Dragonfly Max; ZBook Studio x360 G5; ProBook x360 11 G1; ProBook x360 11 G2; ProBook x360 11 G3; ProBook x360 11 G4; ProBook x360 11 G5; ProBook x360 11 G6; ProBook x360 11 G7 Education Edition; ProBook x360 435 G7; ProBook x360 435 G8; ProBook x360 435 G9; ProBook x360 440 G1; Pro x360 Fortis G9; Pro x360 Fortis G10; Pavilion x360 (11.6 inch); Pavilion x360 (13.3 inch); Pavilion x360 (14 inch); Pavilion x360 (15.6 inch); Envy x360 (13.3 inch); Envy x360 (15.6 inch); Spectre x360 (13.3 inch); Spectre x360 (13.5 inch); Spectre x360 (15.6 inch); Spectre x360 (16.0 inch); Spectre Pro x360 G2; and Stream x360 11 ("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.

34. While each of the Accused Products are convertible models, HP also offers at least six product lines which can be sold in a conventional laptop configuration as an alternative to the infringing convertible configuration (*e.g.*, ProBook, EliteBook, Pavilion, Spectre, Envy, ZBook). HP distinguishes conventional laptops from convertible models by labelling the latter with an "x360" designation in the product name:

- ProBook: https://press.hp.com/us/en/blogs/2020/new-hp-pcs-remote-in-office-workstyles.html (distinguishing between ProBook 445 G8 and ProBook 435 x360 G8 by emphasizing that the latter "features a 360-degree hinge to adapt to four modes")

- EliteBook: https://press.hp.com/us/en/press-releases/2019/hp-transforms-pc-security-with-AI-driven-hp-sure-sense.html (distinguishing between EliteBook 830 G6 and EliteBook 830 x360 G6 by emphasizing that the latter "features four distinct modes")
- Pavilion: https://www.hp.com/us-en/shop/tech-takes/hp-pavilion-laptop-review (distinguishing between Pavilion and Pavilion x360 by emphasizing that the latter has a "unique 360-degree hinge with four modes")
- Spectre: https://press.hp.com/us/en/press-kits/2017/premium-launch.html (distinguishing between Spectre 13 and Spectre x360 13)
- Envy: https://www.hp.com/us-en/shop/tech-takes/hp-envy-laptops-a-complete-review (distinguishing between Envy and Envy x360 by emphasizing that the latter has "four modes")
- ZBook: https://press.hp.com/us/en/press-releases/2018/hps-new-high-performance-workstations.html (distinguishing between ZBook Studio and ZBook Studio x360)

35. HP's customer support website describes four modes into which HP's x360 laptops can be configured.

https://support.hp.com/ph-en/document/ish_3894098-3878823-16.

36. HP also offers convertible laptops under its Dragonfly product line. *See, e.g.*, https://press.hp.com/content/dam/hpi/press/press-kits/2019/fall-commercial-premium-launch/datasheets/HPElite-Dragonfly-Datasheet.pdf (HP Elite Dragonfly Notebook PC Datasheet showing four display modes).

37. The Accused Products are convertible laptops, which are capable of being used in multiple modes, including laptop mode (also called "clamshell mode"), tent mode, tablet mode, and stand mode.

- Elitebook x360 and Spectre x360 (January 3, 2017): https://press.hp.com/us/en/press-releases/2017/hp-inc--ignites-powerful-pc-experiences-at-ces-2017.html
- Pavilion x360 (11.6 inch, 14 inch, 15.6 inch) (April 14, 2017): https://press.hp.com/us/en/blogs/2017/hp_set_to_wow_atcoachellawithexperientialartmusicandtechnologyin.html
- Spectre x360 (13.3 inch) (October 4, 2017): https://press.hp.com/us/en/press-kits/2017/premium-launch.html
- ZBook Studio x360 G5 (April 5, 2018): https://press.hp.com/us/en/press-releases/2018/hps-new-high-performance-workstations.html
- EliteBook x360 1030 G3, Envy x360 (13.3 inch, 15.6 inch) (May 14, 2018): https://press.hp.com/us/en/press-releases/2018/hp-unveils-stunning-new-lineup-of-premium-pcs.html
- EliteBook x360 1040 G5, Spectre x360 (15.6 inch) (October 23, 2018): https://press.hp.com/us/en/press-releases/2018/hp-extends-premium-pc-leadership-with-amazing-innovations.html
- EliteBook x360 830 G5 (January 6, 2019): https://press.hp.com/us/en/press-kits/2018/hp_at_ces_2019.html
- EliteBook x360 1030 G2 (March 11, 2019): https://www.hp.com/us-en/shop/tech-takes/hp-elitebook-x360-1030-g2-laptop-complete-review

- EliteBook x360 830 G6 (April 16, 2019): https://press.hp.com/us/en/press-releases/2019/hp-transforms-pc-security-with-AI-driven-hp-sure-sense.html
- EliteBook x360 1030 G4, EliteBook x360 1040 G6 (May 27, 2019): https://press.hp.com/us/en/press-releases/2019/hp-elevates-premium-and-personalized-pc-experiences-for-leaders-and-creators.html.
- Elite Dragonfly G1 (September 17, 2019): https://press.hp.com/us/en/press-kits/2019/introducing-hp-elite-dragonfly.html
- ProBook x360 11 G3 (January 21, 2020): https://press.hp.com/us/en/press-releases/2020/hp-advances-digital-teaching-and-learning-experiences.html
- EliteBook x360 830 G7, EliteBook x360 1030 G7, EliteBook x360 1040 G7 (May 26, 2020): https://press.hp.com/us/en/press-releases/2020/hp-provides-ultimate-office-experience-at-home.html
- Spectre x360 (13.5 inch) (October 20, 2020): https://press.hp.com/us/en/press-releases/2020/breakthrough-design-spectre-x360.html
- EliteBook x360 1040 G8, Elite Dragonfly G2, Elite Dragonfly Max, ProBook x360 435 G8 (January 10, 2021): https://press.hp.com/us/en/press-kits/2020/hp-ces-2021.html

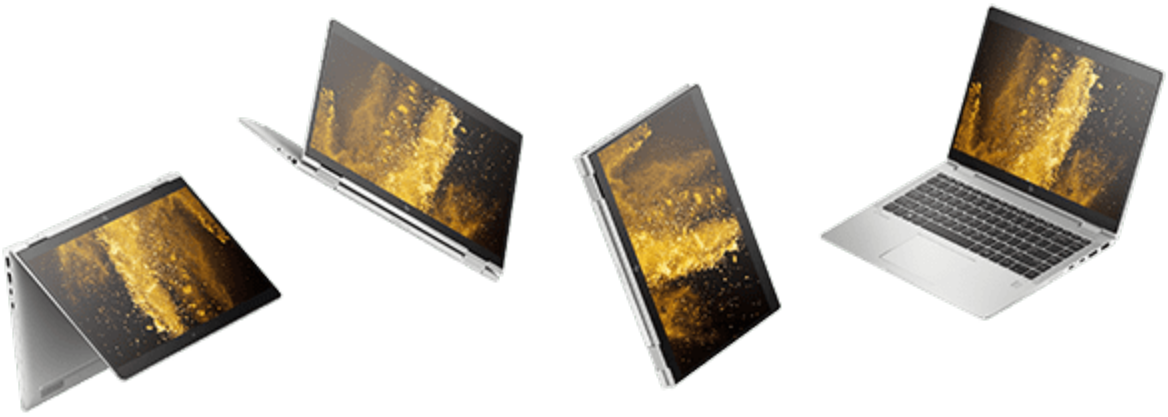
38. HP entities make, use, sell, offer for sale and import the EliteBook x360 1030 G3. The device's features are described on HP's website in various places, including but not limited to:

- https://www.hp.com/us-en/shop/pdp/hp-elitebook-x360-1030-g3-notebook-pc-p-4tb96ut-aba-1 ("EliteBook x360 1030 G3 Webpage")

- https://support.hp.com/us-en/document/c06074000 ("EliteBook x360 1030 G3 Specifications")
- http://h10032.www1.hp.com/ctg/Manual/c06074672.pdf ("EliteBook x360 1030 G3 Maintenance and Service Guide")
- http://h10032.www1.hp.com/ctg/Manual/c06079118.pdf ("EliteBook x360 1030 G3 User Guide")
- https://support.hp.com/ph-en/document/ish_3894098-3878823-16 ("HP x360 Notebook PC Modes")

39. HP's describes the first iteration of its EliteBook x360 1030 as including at least four operating modes:

- "Laptop mode is the traditional, classic way of using your computer's keyboard and display."
- "For uninterrupted views when streaming or sharing, tent mode offers a display-focused view with the keyboard flipped backward."
- "When you're by yourself and focused on streaming, you may prefer a configuration focused more on stability then sharing. That's the intention for media/stand mode, which involves flipping your keyboard back behind your display to provide an even more stable setup for you enjoy your favorite media."
- "Tablet mode is optimized for mobility and touch screen use. Just fold your display against the back of your keyboard and you'll be ready to go."



https://www.hp.com/gb-en/shop/tech-takes/hp-elitebook-x360-1030-g2-laptop-complete-review.

40. HP's customer support webpage explains that configuring HP convertible laptops into "stand mode, tent mode, or tablet mode" will "disable the keyboard on an x360 notebook."

- Stand mode

- Tent mode

- Tablet mode

- Clamshell mode

Enable or disable the keyboard

You can change the position of your x360 notebook to enable or disable the keyboard and power key (depending on the model).

To enable the keyboard and the power button key on an x360 notebook, place the notebook in clamshell mode.

To disable the keyboard on an x360 notebook, place the computer in stand mode, tent mode, or tablet mode.

See, e.g., HP x360 Notebook PC Modes.

41. The Maintenance and Service Guide for the HP ENVY x360 explains that the keyboard and touchpad are automatically disabled when the laptop is not in "Laptop mode."

Your computer has a hinge that allows you to rotate the display 360 degrees. This allows you to use your computer in three modes: productivity mode, entertainment mode, or tablet mode.

Mode		Description
Productivity mode		To use the notebook in productivity mode, raise the display until you can view the display (about 90 to 100 degrees).
Entertainment mode		To use your notebook in entertainment mode, raise the display, and then rotate it backward to a stand position (about 315 degrees). You can rest the notebook on the computer bottom or stand it on the front edges. **NOTE:** The Touchpad and keyboard functions are locked during this mode.
Tablet mode		To use your notebook as a tablet, raise the display, and then rotate it backward until it is flush with the computer bottom (360 degrees). **NOTE:** The Touchpad and keyboard functions are locked during this mode.

http://h10032.www1.hp.com/ctg/Manual/c04642245.pdf, p. 8.

42. On information and belief, the Accused Products identified in the table below are capable of operating in the four operating modes described in the preceding paragraphs:

EliteBook x360 830 G5	https://support.hp.com/us-en/document/c06274483
EliteBook x360 830 G6	https://support.hp.com/us-en/product/hp-elitebook-x360-830-g6-notebook-pc/26625607/document/c06355681
EliteBook x360 830 G7	https://support.hp.com/si-en/document/c06692695
EliteBook x360 830 G8	https://support.hp.com/us-en/document/c06992401
EliteBook x360 1020 G2	https://support.hp.com/us-en/document/c05736970
EliteBook x360 1030 G2	https://support.hp.com/gb-en/document/c05355646
EliteBook x360 1030 G3	https://support.hp.com/us-en/document/c06074000
EliteBook x360 1030 G4	https://support.hp.com/au-en/document/c06432206
EliteBook x360 1030 G7	https://support.hp.com/hk-en/document/c06719267
EliteBook x360 1030 G8	https://support.hp.com/za-en/document/c06992407
EliteBook x360 1040 G5	https://support.hp.com/us-en/document/c06156641
EliteBook x360 1040 G6	https://support.hp.com/za-en/document/c06400841
EliteBook x360 1040 G7	https://support.hp.com/id-en/document/c06719268
EliteBook x360 1040 G8	https://support.hp.com/ie-en/document/c06992408
Elite Dragonfly G1	https://support.hp.com/us-en/document/c06469188
Elite Dragonfly G2	https://support.hp.com/in-en/document/c06994777
Elite Dragonfly Max	https://support.hp.com/hk-en/document/c07002649
ZBook Studio x360 G5	https://support.hp.com/lt-en/document/c07722736

ProBook x360 11 G1	https://support.hp.com/ee-en/document/c05350661
ProBook x360 11 G2	https://support.hp.com/ca-en/document/c05552288
ProBook x360 11 G3	https://support.hp.com/us-en/document/c06191159
ProBook x360 11 G4	https://support.hp.com/us-en/document/c06273639
ProBook x360 11 G5	https://support.hp.com/us-en/document/c06512428
ProBook x360 11 G6	https://support.hp.com/us-en/document/c06617212
ProBook x360 11 G7 Education Edition	https://support.hp.com/hk-en/document/c07051142
ProBook x360 435 G7	https://support.hp.com/au-en/document/c06646120
ProBook x360 435 G8	https://support.hp.com/us-en/product/hp-probook-x360-435-g8-notebook-pc/
ProBook x360 440 G1	https://support.hp.com/za-en/document/c06062560
Pavilion x360 (11.6 inch)	https://support.hp.com/us-en/product/hp-pavilion-11-u000-x360-convertible-pc/
Pavilion x360 (13.3 inch)	https://support.hp.com/us-en/product/hp-pavilion-13-u100-x360-convertible-pc/
Pavilion x360 (14 inch)	https://support.hp.com/us-en/product/hp-pavilion-14-cd0000-x360-convertible-pc/
Pavilion x360 (15.6 inch)	https://support.hp.com/us-en/product/hp-pavilion-15-br000-x360-convertible-pc/
Envy x360 (13.3 inch)	https://support.hp.com/ie-en/product/hp-envy-13-ag0000-x360-convertible-pc/
Envy x360 (15.6 inch)	https://support.hp.com/ie-en/product/hp-envy-15-cn0000-x360-convertible-pc/
Spectre x360 (13.3 inch)	https://support.hp.com/gb-en/product/hp-spectre-13-ae000-x360-convertible-pc/
Spectre x360 (13.5 inch)	https://support.hp.com/us-en/product/hp-spectre-x360-14-convertible-pc-14-ea0000/35698516/model/

Spectre x360 (15.6 inch)	https://support.hp.com/us-en/product/hp-spectre-15-bl000-x360-convertible-pc/
Spectre Pro x360 G2	https://support.hp.com/us-en/document/c04957040
Stream x360 11	https://support.hp.com/gb-en/product/hp-stream-11-aa000-x360-convertible-pc/

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

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

COUNT I

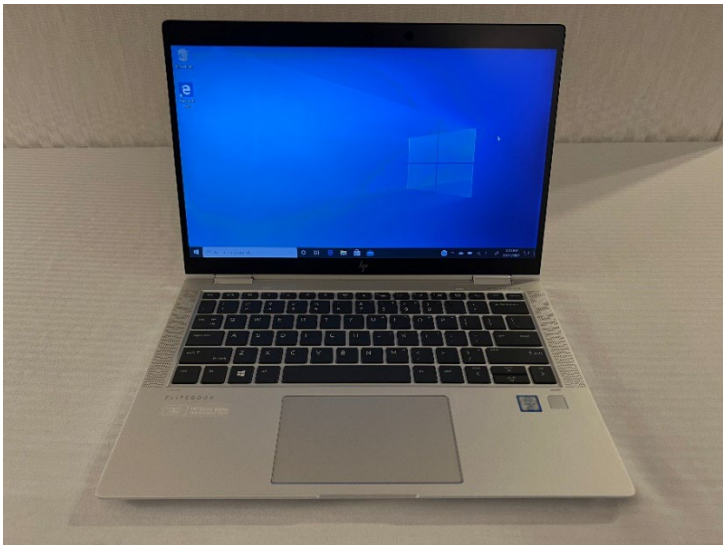
(Infringement of U.S. Patent No. 8,289,688)

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

HP's Direct Infringement

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

47. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) are portable computers that include a base unit comprising an integrated keyboard and a single display unit including a single display screen configured to display content. For example:



48. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) 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:

Sensors	Accelerometer Magnetometer Gyrometer Ambient light sensor (ALS) Hall sensor

See, e.g., EliteBook x360 1030 G3 Specifications

First content display orientation

Second content display orientation

49. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a display orientation module that is configured to detect a change between a laptop mode, an easel mode, and a frame mode based on the detected physical orientation of the single display unit relative to the base unit. For example:

Laptop mode

Easel mode

Frame mode

50. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a display orientation module further configured to trigger a display inversion from one of the first and

second content display orientations to the other of the first and second content display orientations responsive to the orientation sensor detecting the change between the laptop mode and the easel mode. For example:

First content display orientation in laptop mode

Second content display orientation in easel mode

51. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a display orientation module further configured to trigger a display inversion from one of the first and second content display orientations to the other of the first and second content display orientations responsive to the orientation sensor detecting the change between the easel mode and the frame mode. For example:

Easel mode

Frame mode

HP's Knowledge of the Patents Owned by Its Subsidiary Hewlett-Packard Development Company, L.P.

52. On information and belief, the Hewlett-Packard Development Company, L.P. ("HPDC") is a wholly-owned subsidiary of HP.

53. On information and belief, HP Inc. acts as the agent for HPDC in patent prosecution matters in the United States. For example, on April 27, 2018, HPDC filed with the

USPTO International Application No. PCT/US2018/029889 ("the '889 HP Application"). In a POA that HPDC filed with the '889 HP Application, HPDC appointed HP Inc. as its agent.

GENERAL POWER OF ATTORNEY

(for several international applications filed under the Patent Cooperation Treaty)

(PCT Rule 90.5)

The undersigned person(s):
(Family name followed by given name; for a legal entity, full official designation. The address must include postal code and name of country.)

HEWLETT-PACKARD DEVELOPMENT COMPANY, L.P.
11445 Compaq Center Drive W.
Houston TX 77070
US

hereby appoint(s) the following person as: ☒ agent ☐ common representative

Name and address
(Family name followed by given name; for a legal entity, full official designation. The address must include postal code and name of country.)

See attached page 3 for list of names. All appointed agents have the same addresses:

HP Inc.
3390 E. Harmony Road
Mail Stop 35
Fort Collins CO 80528
US

to represent the undersigned before
☒ all the competent International Authorities
☐ the International Searching Authority only
☐ the Authority specified for supplementary search only: _____
(please indicate the Authority(ies) specified for supplementary search)
☐ the International Preliminary Examining Authority only

in connection with any and all international applications filed by the undersigned with the following Office:

United States Patent and Trademark Office as receiving Office

and to make or receive payments on behalf of the undersigned.

This Power of Attorney supercedes any previous Power of Attorney and may be revoked by Hewlett-Packard Development Company, L.P., at any time.

54. In the POA that HPDC filed with the '889 HP Application, HPDC identified 17 patent attorneys from HP Inc., including Ceyda Azakli Maisami and Benjamin Su.

Attachment to PCT General Power of Attorney Dated: February 8 2017
Agents Authorized for
Hewlett-Packard Development Company, L.P.

US Practitioners	Reg. No.
BURROWS, Sarah E.	59,017
CARTER, Daniel J.	72,493
COSTALES, Shruti	56,333
GARDINER, Austin William	70,394
HASAN, Nishat	61,694
HOOPES, Benjamin	63,493
KARNSTEIN, Walter W.	35,565
LEMMON, Marcus B.	63,664
MAISAMI, Ceyda Azakli	67,530
MATHEW, Wilson T.	71,262
MORRIS, Jordan E.	68,263
PERRY, Garry A.	56,696
SEARLE, Benjamin M.	59,540
SORENSEN, C. Blake	60,108
SU, Benjamin	61,725
WASSON, Robert D.	40,218
WOODWORTH, Jeffrey C.	69,055

HP's Knowledge of the '688 Patent

55. 70. On information and belief, HP has known of the '688 patent since at least about November 2014.

56. The '688 patent and its published application were cited during prosecution of at least four U.S. patent applications owned by HPDC.

The HP ’714 Application

57. For example, on September 11, 2013, HPDC filed U.S. Patent Application No. 29/466,714 (“the HP ’714 Application”), entitled “Computing Device.” The Application Data Sheet included in the “Correspondence Information” the email address ipa.mail@hp.com and identified Customer No. 22879.

58. On September 19, 2013, the USPTO issued a notice acknowledging receipt of the ’714 Application to “Hewlett-Packard Company” and listed Customer No. 22879. On information and belief, in about November 2015, Hewlett-Packard Company changed its name to HP Inc. https://investor.hp.com/news/press-release-details/2015/HP-Board-of-Directors-Approves-Separation/default.aspx

59. On November 18, 2014, the applicant submitted an Information Disclosure Statement (“IDS”) that identifies the ’688 patent along with ten other patent references.

60. On February 25, 2015, the USPTO issued a Notice of Allowance that indicates it was mailed to HP Inc.’s predecessor, Hewlett-Packard Company.

61. On April 21, 2015, the HP ’714 Application issued as U.S. Patent No. D727,309, and identifies the ’688 patent under the “References Cited” section.

The HP ’002 Application

62. As another example, on December 11, 2015, HPDC filed U.S. Patent Application No. 14/898,002 (“the HP ’002 Application”), entitled “Tablet Computer.” The Application Data Sheet included in the “Correspondence Information” the email address IPA.MAIL@HP.COM and identified Customer No. 22879. The Application Data Sheet was signed by Ceyda Azakli Maisami. Ms. Maisami’s LinkedIn page identifies her as a Senior Patent Counsel at HP from January 2015 to November 2017. https://www.linkedin.com/in/ceydaam/

63. On April 5, 2016, the USPTO issued a Notice of Acceptance of Application to "HP Inc." and listed Customer No. 22879.

64. The HP '002 Application discloses a tablet computer having a keyboard that rotates behind the screen, as depicted in Figures 1-3 below.

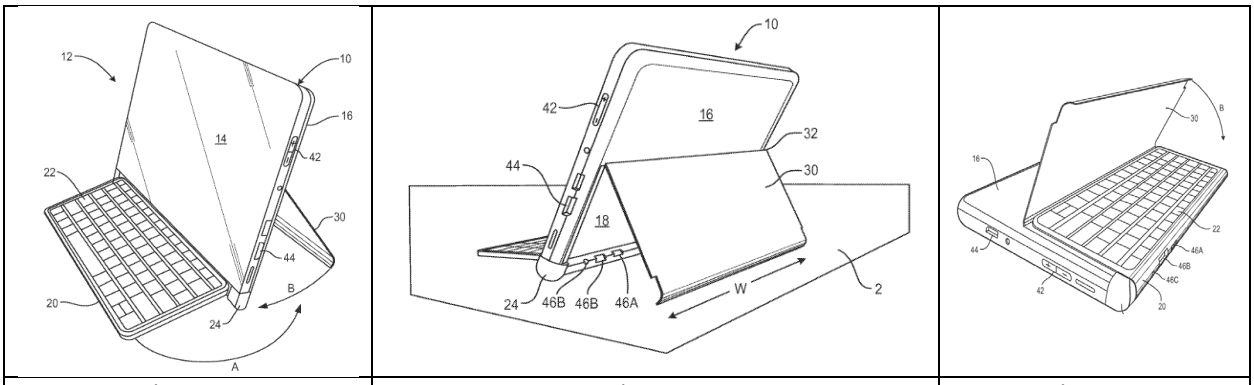


Figure 1	Figure 2	Figure 3

65. On October 7, 2016, the USPTO issued an office action that indicates it was mailed to HP Inc. The examiner rejected claims 1-5, 7, 8, 11 and 14-15 as anticipated by Chen (2005/0052831), and rejected dependent claims 9 and 10 "under 35 U.S.C. 103 as being unpatentable over Chen (2005/0052831) as applied to the claims above, and further in view of Behar (8,289,688)." The office action discusses Figure 17 of the '688 patent, depicted below.

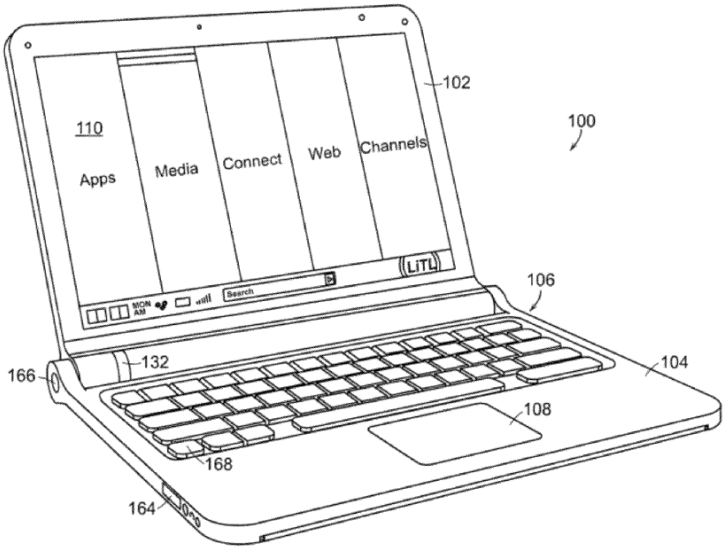


FIG. 17

66. On January 6, 2017, the applicant responded to the office action by amending, inter alia, claim 1 and dependent claim 9. The applicant argued that "Chen and Behar, independently or in combination, do not teach, suggest, or render obvious reach [sic] and every limitation of Applicant's claim 1." The applicant requested withdrawal of the obviousness rejection.

67. On March 6, 2017, the USPTO issued a Notice of Allowance that indicates it was mailed to HP Inc.

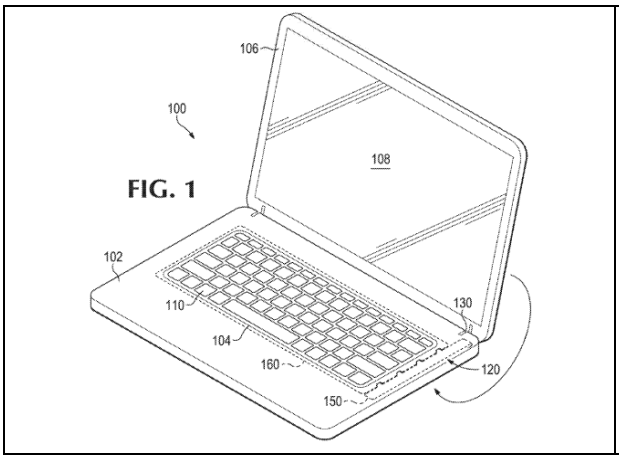
68. On information and belief, Ms. Maisami, an HP patent attorney, authorized payment of the required issue fee for the HP '002 Application on or about April 29, 2017.

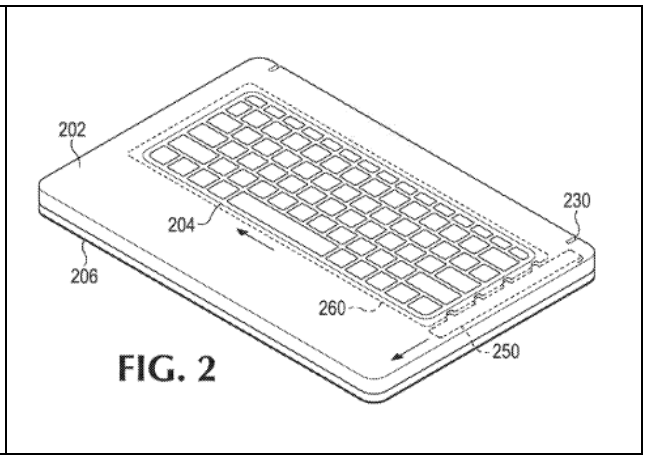
69. On June 6, 2017, the HP '002 Application issued as U.S. Patent No. 9,671,829, identifies the '688 patent under the "References Cited" section, and identifies "HP Patent Department" as the "Attorney, Agent, or Firm."

The HP '368 Application

70. As another example, on March 31, 2016, HPDC filed U.S. Patent Application No. 15/026,368 ("the HP '368 Application"), entitled "Locking Mechanism To Lock Key Movement Of Keyboards." The Application Data Sheet included in the "Correspondence Information" the email address ipa.mail@hp.com and identified Customer No. 22879. The Application Data Sheet was signed by Ms. Maisami.

71. Paragraph 23 of the specification of the HP '368 Application discloses that a "portable computing device may include a hinged display that may be rotated through a range of 360 degrees of motion, including ranges that lock or unlock the keyboard." Figures 1 and 2 depict a computing device with the keyboard in an unlocked and locked position, respectively.





72. The March 31, 2016 submission by HPDC included an IDS that identifies the ’688 patent.

73. On July 5, 2017, the USPTO issued a Notice of Allowance that indicates it was mailed to HP Inc.

74. On or about August 2, 2017, Benjamin Su authorized payment of the required issue fee for the HP ’368 Application. On information and belief, Mr. Su has been a Senior Patent Counsel at HP Inc. since about November 2013. https://www.linkedin.com/in/benjamin-s-5032166/

75. On October 3, 2017, the HP ’368 Application issued as U.S. Patent No. 9,778,683, identifies the ’688 patent under the “References Cited” section, and identifies “HP Patent Department” as the “Attorney, Agent, or Firm.”

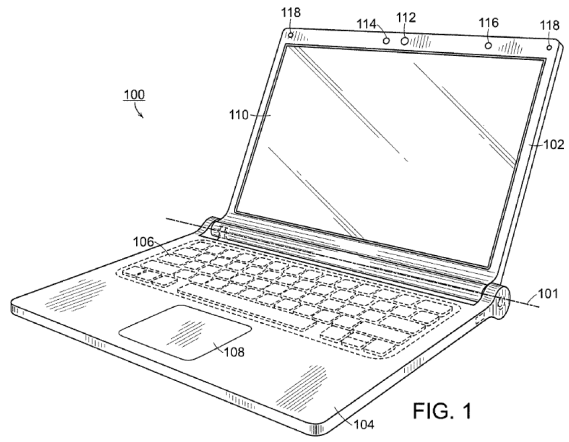
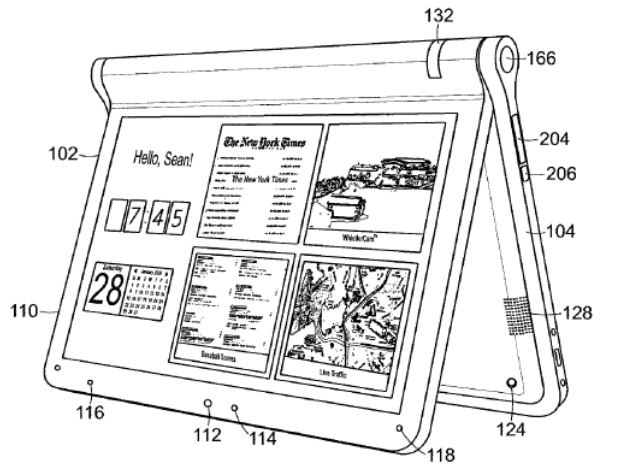
The HP ’608 Application

76. As another example, on March 21, 2016, HPDC filed U.S. Patent Application No. 15/023,608 (“the HP ’608 Application”), entitled “Form Adjustable Angle Between A Battery And Battery Cavity To Selectively Place A Video Display In Viewing Orientations.” The Application Data Sheet included in the “Correspondence Information” the email address

ipa.mail@hp.com and identified Customer No. 22879. The Application Data Sheet was signed by Ms. Maisami.

77. On February 27, 2017, the USPTO issued an office action that indicates it was mailed to HP Inc. The examiner rejected claims 1-4, 6-12, and 14-15 "under 35 U.S.C. 103 as being unpatentable over Iwasaki et al., US Pub. 2004/0191614 A1, (citations in parenthesis) in view of Behar et al (US 20090244832 A1)." The examiner further stated: "Behar teaches a portable computer with multiple display configurations where the hinge member (101) is located on the outer edge of the main body (100) (see fig. 1, 4, 26 par. 0052 and 0062)."

78. The reference cited by the examiner, US 2009/0244832 ("Behar '832"), is the publication of the application that issued as the '688 patent. Figures 1 and 4 from Behar '832, which the examiner cited, are depicted below.

	
Behar '832, Figure 1	Behar '832, Figure 4

79. In a response dated May 24, 2017, the applicant amended claim 1 and attempted to distinguish Behar '832.

80. On August 2, 2017, the USPTO issued an office action that indicates it was mailed to HP Inc. The examiner maintained the obviousness rejection based on Behar '832.

81. An Interview Summary dated August 30, 2017 indicates it was sent to HP Inc. According to that summary, an applicant-initiated interview occurred on August 23, 2017 during which the attendees discussed Behar ’832.

82. In a Request for Continued Examination (“RCE”) dated September 19, 2017, the applicant further amended claim 1 and further attempted to distinguish Behar ’832.

83. On September 28, 2017, the USPTO issued an office action that indicates it was mailed to HP Inc. The examiner issued an obviousness rejection based on Behar ’832.

84. An Interview Summary dated November 7, 2017 indicates it was sent to HP Inc. According to that summary, an applicant-initiated interview occurred on November 2, 2017.

85. In a response dated November 9, 2017, the applicant further amended claim 1 and further attempted to distinguish Behar ’832. The applicant indicated that during the November 2, 2017 interview, the attendees discussed Behar ’832.

86. On November 27, 2017, the USPTO issued a Notice of Allowance that indicates it was mailed to HP Inc.

87. On or about December 6, 2017, HP’s patent attorney, Mr. Su, authorized payment of the required issue fee for the HP ’608 Application.

88. On January 23, 2018, the HP ’608 Application issued as U.S. Patent No. 9,874,900, identifies Behar ’832 under the “References Cited” section, and identifies “HP Inc. Patent Department” as the “Attorney, Agent, or Firm.”

89. On information and belief, HP has known of the ’688 patent since at least about November 2014, when the ’688 patent was identified in an IDS submitted in connection with the HP ’714 Application. In addition, HP has known of the ’688 patent at least since 2015, and at least since 2016, and at least since 2017, due to the involvement of HP Inc.’s in-house patent attorneys

with the HP ’002, the HP ’368, and HP ’608 Applications, which were prosecuted during the 2015-2017 time period. As detailed in the foregoing allegations, the ’688 patent was discussed and cited in office actions, interviews, IDSs, and applicant responses in the 2015-2017 time period. In-house patent attorneys for HP Inc. signed Application Data Sheets and authorized payment of issue fees for the HP ’002, the HP ’368, and HP ’608 Applications, and USPTO correspondence regarding each of these applications was addressed to HP Inc.

HP’s Induced Infringement

90. On information and belief, HP has known that the Accused Products infringe the ’688 patent since at least 2017, by which time the Accused Products were being offered for sale, sold, imported, and used in the United States. *See*, *e.g.*, https://press.hp.com/us/en/press-releases/2017/hp-inc--ignites-powerful-pc-experiences-at-ces-2017.html.

91. Since at least 2017, HP knew that the Accused Products infringe at least claim 19 of the ’688 patent when used by customers or other users, when imported by others, and when sold or offered for sale by third parties such as Best Buy.

92. Since at least 2017, HP has induced infringement and continues to induce infringement by actively encouraging third-party resellers to directly infringe at least claim 19 of the ’688 patent by facilitating resellers’ sales and offers for sale of the Accused Products and has actively encouraged such sales and offers for sale. According to HP’s 2018 10-K statement, “HP sells a significant portion of its products through third-party distributors and resellers.” https://d18rn0p25nwr6d.cloudfront.net/CIK-0000047217/e31dddb7-0e0e-4617-8426-8e1889889288.pdf (page 63). When announcing the launch of the Accused Products, HP has routinely stated that the Accused Products will be available at Best Buy:

- January 3, 2017: “The HP Spectre x360 15.6″ is expected to be available for pre-order starting on January 3, 2017, for purchase on January 15, 2017 via

BestBuy.com and in U.S. Best Buy stores in February, starting at $1,499." https://press.hp.com/us/en/press-releases/2017/hp-inc--ignites-powerful-pc-experiences-at-ces-2017.html

- October 4, 2017: "Best Buy will be accepting pre-orders for HP Spectre 13 and HP Spectre x360 laptops starting on October 4." https://press.hp.com/us/en/press-releases/2017/hp-stuns-with-the-new-spectre-portfolio.html
- October 23, 2018: "The HP Spectre x360 15 is expected to be available in November at HP.com for a starting price of 1,389.99. The device is expected to be available at Best Buy stores in December." https://press.hp.com/us/en/press-releases/2018/hp-extends-premium-pc-leadership-with-amazing-innovations.html
- January 5, 2020: "HP Spectre x360 15 is expected to be available in March via HP.com for a starting price of $1,599.99. The device will also be available at Best Buy." https://press.hp.com/us/en/press-releases/2020/unleashing-next-generation-computing-innovations-to-enable-more-freedom.html
- September 21, 2021: "The HP Spectre x360 16 inch 2-in-1 Laptop is expected to be available beginning in October at HP.com for a starting price of $1,639. It is also expected to be available at Best Buy later this fall." https://press.hp.com/us/en/press-releases/2021/hp-announces-consumer-pc.html

93. Since at least 2017, HP has induced infringement and continues to induce infringement by actively encouraging customers or other users to directly infringe at least claim 19 of the '688 patent. HP has provided with the Accused Products and on the hp.com website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 19 of the '688 patent. For

example, HP's support website touts the availability of four display modes on its x360 notebooks. https://support.hp.com/ph-en/document/ish_3894098-3878823-16. As another example, HP's user manual for the ENVY x360 Convertible Notebook PC touts the benefits of multi-mode functionality. http://h10032.www1.hp.com/ctg/Manual/c04642245.pdf (page 8).

HP's Willful Infringement

94. HP has willfully infringed at least claim 19 of the '688 patent. HP's offers for sale, sales, and use of the Accused Products with provision of manuals and instruction to purchasers that encourage use that HP knew would infringe the '688 patent demonstrates the willful nature of HP's infringement.

95. According to a May 2022 interview with HP's Chief IP Counsel, HP's IP legal team is "a very large team" that "is between 60 and 70 people globally." https://www.managingip.com/article/2a5d1gc9g5dvsgo5lz8qo/corner-office-podcast-phyllis-turner-brim-chief-ip-counsel-at-hp (3:20 – 3:40). On information and belief, HP has procedures to evaluate whether HP products have freedom to operate in the United States. Given the large size of HP's IP legal team, given HP's procedures, and given HP's knowledge of the '688 patent, if HP did not investigate whether the Accused Products infringe the '688 patent, then HP was willfully blind to a reasonable likelihood that the Accused Products infringe the '688 patent.

96. The foregoing description of HP'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.

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

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

COUNT II

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

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

HP's Direct Infringement

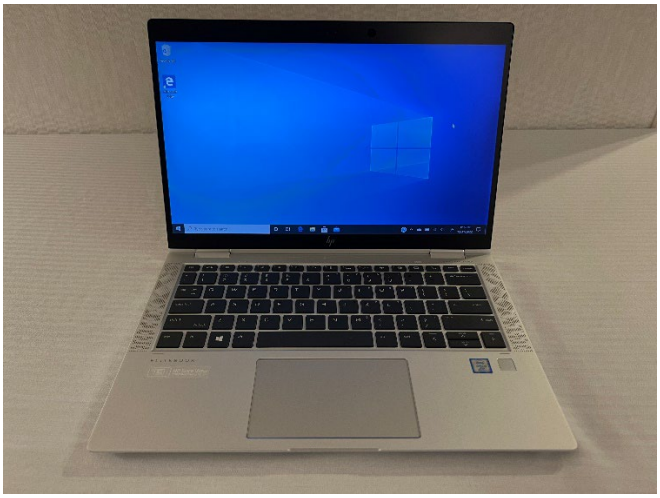
100. HP has directly infringed and continues to directly infringe, literally and/or equivalently, one or more claims of the '844 patent, including at least claims 10 and 17, including by importing, using, selling, and offering for sale in the United States the Accused Products.

101. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) are portable computers that are configurable between a plurality of display modes including a laptop mode and an easel mode wherein transitions between the plurality of display modes permit an operator to interact with a single display screen in each of the plurality of display modes. For example:

Laptop mode

Easel mode

102. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) 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:



103. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a hinge assembly disposed at least partially within the base. For example:

See, e.g., EliteBook x360 1030 G3 Webpage

104. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a main display component that defines an axis of rotation about which both the base and the main display component are rotatable to transition the portable computer between at least the laptop mode and the easel mode, wherein the transition between the laptop mode and the easel mode allows the operator to operate the portable computer while viewing the single display screen in each of the plurality of display modes. For example:

Laptop mode

Easel mode

105. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a laptop mode that is configured to display to a user on the main display component a first content mode having a first content display orientation with the main display component oriented towards the user and the keyboard oriented to receive input from the user. For example:

Laptop mode configured to display a first content mode

106. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an easel mode that is configured to display to the user on the main display component a second content mode having a second content display orientation with the main display component oriented towards the user and the keyboard oriented away from the user. For example:

Easel mode configured to display a second content mode

107. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include first and second content display orientations that are 180 degrees relative to each other. For example:

Laptop mode displaying first content display orientation

Easel mode displaying second content display orientation

108. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include portable computers that are operable in the easel mode to enable the user to interact with displayed content without interacting with the keyboard. For example:

Easel mode

109. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) 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 EliteBook x360 1030 G3 includes a touchscreen that is accessible in any mode.

> **Touch**
>
> 33.8 cm (13.3 in) diagonal 4K IPS eDP with PSR BrightView LED-backlit touch screen, direct bonded with Corning Gorilla Glass 4, 500 cd/m², 100% sRGB (3840 x 2160)
>
> 33.8 cm (13.3 in) diagonal FHD IPS eDP with PSR anti-glare LED-backlit touch screen, direct bonded with Corning Gorilla Glass 4, 400 cd/m², 100% sRGB (1920 x 1080)
>
> 33.8 cm (13.3 in) diagonal FHD IPS eDP with PSR BrightView LED-backlit touch screen, direct bonded with Corning Gorilla Glass 4, 400 cd/m², 100% sRGB (1920 x 1080)

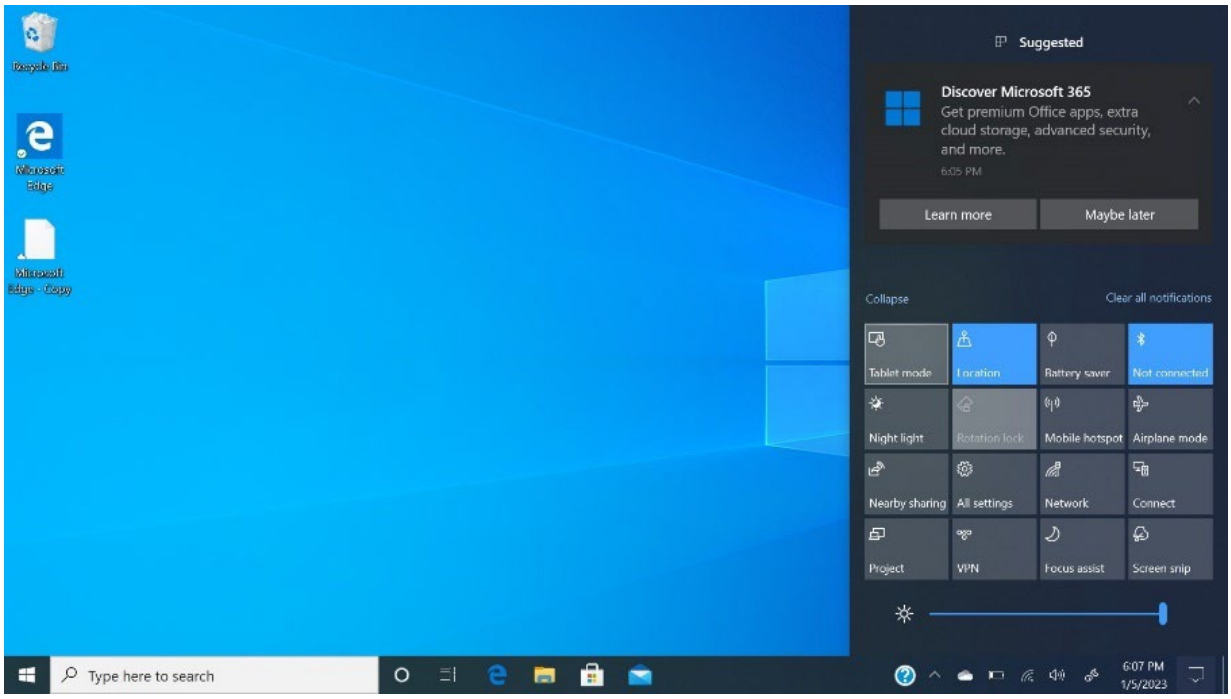
See, e.g., EliteBook x360 1030 G3 Specifications

110. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a plurality of modes that includes a frame mode in which the main display component is oriented towards the

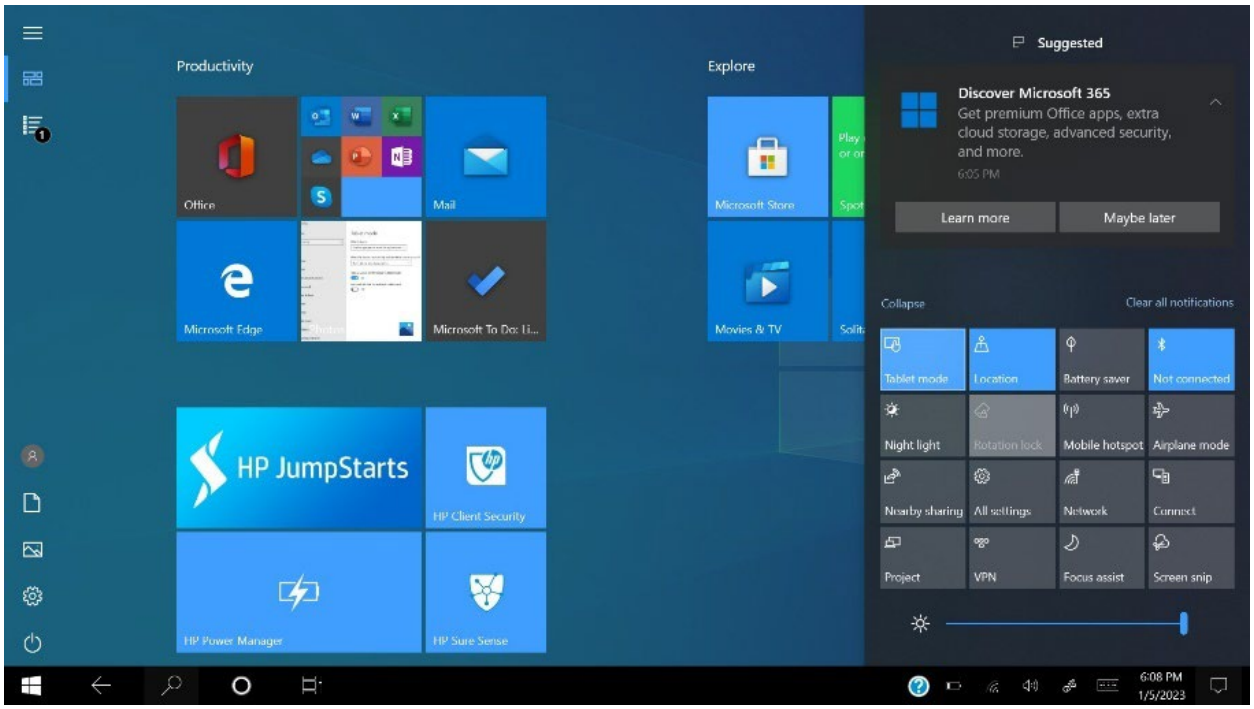
operator, the base contacts a substantially horizontal surface, and the keyboard faces the substantially horizontal surface.

Frame mode

111. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an operating display mode which is selected from the plurality of display modes in response to operation of the navigation control. For example:



First operating display mode



Second operating display mode

HP's Knowledge of the '844 Patent

112. Since at least the filing of this Complaint, HP knows of the '844 patent.

113. On information and belief, HP's knowledge of the '688 patent by at least 2014 would have caused HP to investigate, become aware of, and consider LiTL's related patents, including the '844 patent, before the filing of this Complaint.

HP's Induced Infringement

114. Since at least the filing of this Complaint, HP knows that the Accused Products infringe at least claims 10 and 17 of the '844 patent when used by customers or other users, when imported by others, and when sold or offered for sale by third parties such as Best Buy.

115. Since at least the filing of this Complaint, HP induces infringement by actively encouraging third-party resellers to directly infringe at least claims 10 and 17 of the '844 patent by facilitating resellers' sales and offers for sale of the Accused Products and actively encouraging such sales and offers for sale. According to HP's 2018 10-K statement, "HP sells a

significant portion of its products through third-party distributors and resellers." https://d18rn0p25nwr6d.cloudfront.net/CIK-0000047217/e31dddb7-0e0e-4617-8426-8e1889889288.pdf (page 63). When announcing the launch of the Accused Products, HP routinely states that the Accused Products will be available at Best Buy.

116. Since at least the filing of this Complaint, HP induces infringement by actively encouraging customers or other users to directly infringe at least claims 10 and 17 of the '844 patent. HP has provided with the Accused Products and on the hp.com website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claims 10 and 17 of the '844 patent. For example, HP's support website touts the availability of four display modes on its x360 notebooks. https://support.hp.com/us-en/computer. As another example, HP's user manual for the ENVY x360 Convertible Notebook PC touts the benefits of multi-mode functionality. http://h10032.www1.hp.com/ctg/Manual/c04642245.pdf (page 8).

HP's Willful Infringement

117. HP is willfully infringing at least claims 10 and 17 of the '844 patent. HP's offers for sale, sales, and use of the Accused Products with provision of manuals and instruction to purchasers that encourage use that HP knows will infringe the '844 patent demonstrates the willful nature of HP's infringement.

118. According to a May 2022 interview with HP's Chief IP Counsel, HP's IP legal team is "a very large team" that "is between 60 and 70 people globally." https://www.managingip.com/article/2a5d1gc9g5dvsgo5lz8qo/corner-office-podcast-phyllis-turner-brim-chief-ip-counsel-at-hp (3:20 - 3:40). On information and belief, HP has procedures to evaluate whether HP products have freedom to operate in the United States. Given the "very

large" size of HP's IP legal team, given HP's procedures, given HP's knowledge of the '688 patent and the related '844 patent since before the filing of this Complaint, and given HP's knowledge of the '844 patent, if HP did not investigate whether the Accused Products infringe the '844 patent, then HP was willfully blind to a reasonable likelihood that the Accused Products infringe the '844 patent.

119. The foregoing description of HP'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.

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

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

COUNT III

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

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

HP's Direct Infringement

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

124. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) are portable computers that are configurable between a plurality of display modes including at least a laptop mode, a frame mode, and an easel mode. For example:

Laptop mode

Frame mode

Easel mode

125. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) are portable computers comprising a display component and a base. For example:

126. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an accelerometer configured to generate orientation information indicative of a current display mode among the plurality of display modes of the portable computer. For example:

Sensors	Accelerometer Magnetometer Gyrometer Ambient light sensor (ALS) Hall sensor

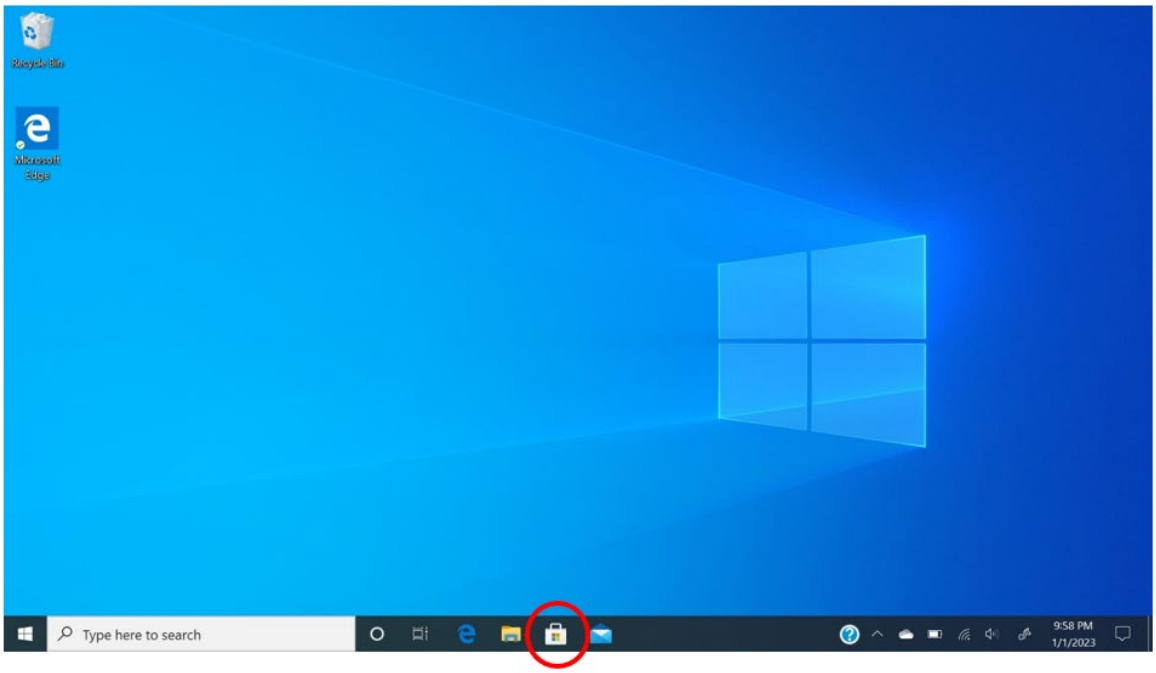
See, e.g., EliteBook x360 1030 G3 Specifications

127. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a display manager configured to display computer content on the display component and vary the computer content displayed responsive to the orientation information indicating a transition between at least the laptop and easel modes. For example:

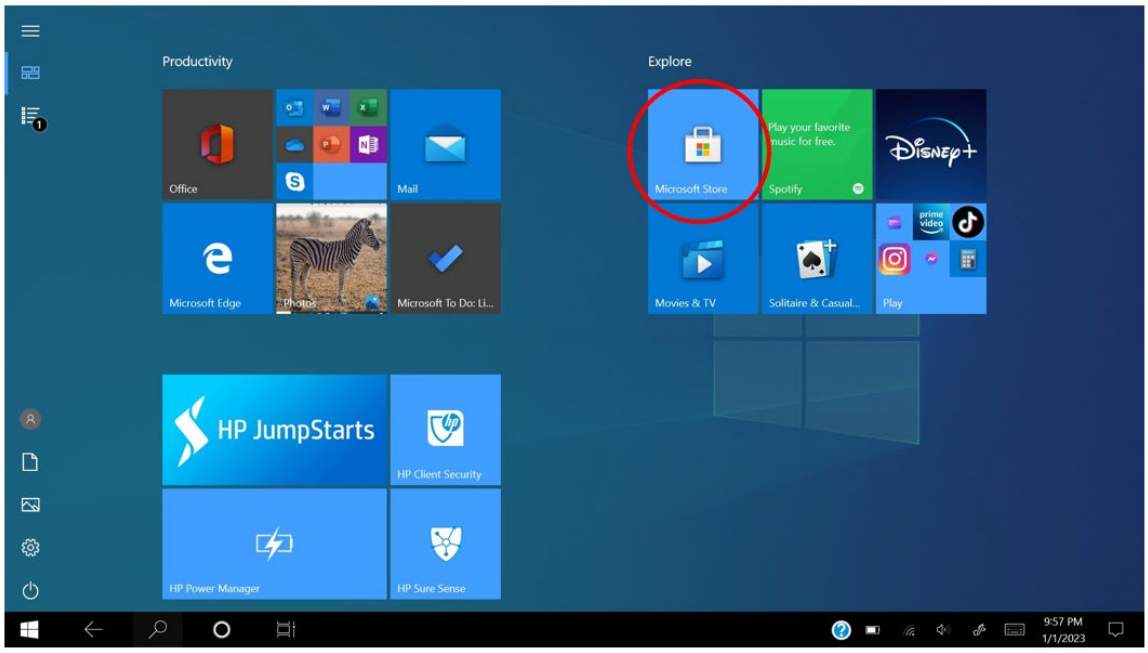
Display content in laptop mode

Display content in easel mode

128. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a display manager configured to enlarge the computer content displayed on the display component responsive to a transition from the laptop mode to the easel mode. For example:



Computer content displayed in laptop mode



Computer content displayed in easel mode

129. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an interface between the display component and the base defining a longitudinal axis running along the

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

See, e.g., EliteBook x360 1030 G3 Webpage

Computer rotated along longitudinal axis

130. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an interface constructed and arranged such that rotating either the display component or the base about the longitudinal axis up to approximately 180 degrees from a closed mode configures the portable computer into the laptop mode. For example:

Laptop mode at approximately 180 degrees

131. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an interface with the laptop mode having a display component oriented towards an operator and a keyboard disposed within the base oriented to receive input from the operator. For example:

Laptop mode

132. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an interface constructed and arranged such that rotating either the display component or the base about the longitudinal axis beyond approximately 270 degrees from the closed mode transitions the portable computer for viewing in the frame mode or the easel mode. For example:

Frame mode

Easel mode

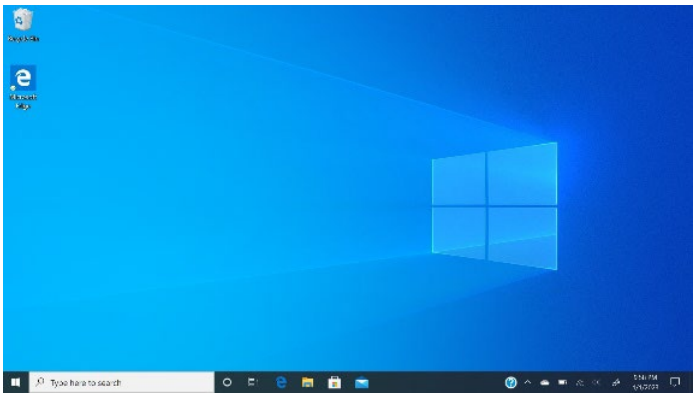
133. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an interface with the display component positioned toward the operator in frame mode, while the base contacts a substantially horizontal surface, and the keyboard is directed towards the substantially horizontal surface. For example:

Frame mode

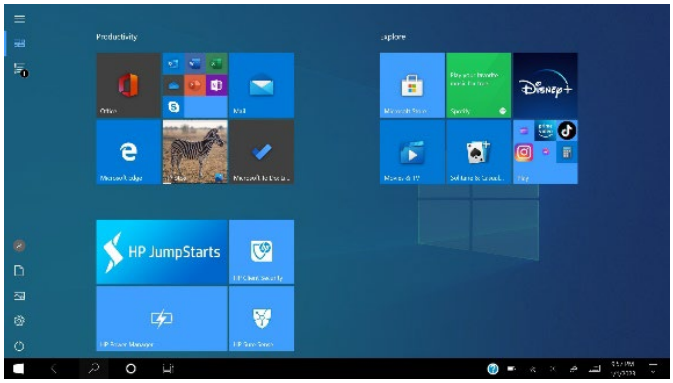
134. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an interface with the display component positioned toward the operator in easel mode, with the keyboard oriented away from the operator. For example:

Easel mode

135. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) comprise a portable computer configured to detect a transition to at least the easel mode and the frame mode based on the orientation information, automatically determine a display orientation of content, and disable the keyboard when the portable computer is in the frame mode. For example:



Laptop mode display orientation



Frame/easel mode display orientation

Enable or disable the keyboard

You can change the position of your x360 notebook to enable or disable the keyboard and power key (depending on the model).

To enable the keyboard and the power button key on an x360 notebook, place the notebook in clamshell mode.

To disable the keyboard on an x360 notebook, place the computer in stand mode, tent mode, or tablet mode.

See, e.g., HP x360 Notebook PC Modes.

HP's Knowledge of the '229 Patent

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

137. The published application of the '229 patent, U.S. Pub. No. 2013/0141854 ("the '854 Publication"), was identified to HP Inc. in a search report mailed to HP Inc. on January 17, 2019 by the International Searching Authority during prosecution of International Application

No. PCT/US2018/029889 ("the HP PCT '889 Application"), which HPDC filed on April 27, 2018, and for which Benjamin Su of HP Inc. was the designated agent.

PATENT COOPERATION TREATY

From the INTERNATIONAL SEARCHING AUTHORITY

PCT

WRITTEN OPINION OF THE INTERNATIONAL SEARCHING AUTHORITY

(PCT Rule 43*bis*.1)

To:
SU, Benjamin
HP Inc. ,
3390 E. Harmony Road, Mail Stop 35
Fort Collins, Colorado 80528
United States of America

Date of mailing *(day/month/year)* 17 January 2019 (17.01.2019)	
Applicant's or agent's file reference 84929461	**FOR FURTHER ACTION** See paragraph 2 below

International application No.	International filing date *(day/month/year)*	Priority date *(day/month/year)*
PCT/US 2018/029889	27 April 2018 (27.04.2018)	

International Patent Classification (IPC) or both national classification and IPC
G06F 1/16 *(2006.01)*
G06F 3/01 *(2006.01)*

Applicant
HEWLETT-PACKARD DEVELOPMENT COMPANY, L.P.

Reference is made to the following documents:

US 2013/0141854 A1 (YVES BEHAR et al.) 06.06.2013
US 2003/0112588 A1 (TOSHIBA AMERICA INFORMATION SYSTEMS, INC.) 19.06.2003
US 2015/0185788 A1 (GOOGLE INC) 02.07.2015

138. On September 2, 2020, HPDC filed U.S. Patent Application No. 16,977,513 ("the HP '513 Application"), entitled "Keyboard Mode." The Application Data Sheet included in the "Correspondence Information" the email address ipa.mail@hp.com and identified Customer No. 22879. The Application Data Sheet was signed by Benjamin Su.

139. The HP '513 Application claimed the benefit of the HP PCT '889 Application, which HPDC filed on April 27, 2018, and for which Benjamin Su of HP Inc. was also the designated agent.

140. HPDC included with the HP ’513 Application an IDS that identifies LiTL’s ’854 Publication.

141. On information and belief, HP has a very large IP legal team that carefully analyzes HP’s pending patent applications to determine their value to HP, and whose members participate in cross functional teams to provide support in licensing, litigation, or other matters. HP routinely identifies such responsibilities in job postings for its patent development group.

Key Responsibilities:

- Drafting patent applications and office action responses.
- Managing patent applications throughout the patent lifecycle by working directly with HP's inventor community, personally drafting and prosecuting high quality patent applications for strategically important inventions, and interacting with worldwide patent offices to secure valuable patent coverage
- Actively participating in HP's invention disclosure review process to help ensure that HP's best inventions are identified and patented
- Analyzing pending patent applications to determine their value to HP and to formulate a global filing strategy
- Assisting patent portfolio managers with analysis of HP's patent portfolio, including preparation of claim charts
- Collaborating with engineers in invention mining sessions, patent scrubs, and patent education sessions
- Actively engaging in training, knowledge sharing, and other career development opportunities to hone technical and legal abilities and prepare for promotional or rotational opportunities
- Participating from time to time as a member of a cross functional team to provide support in licensing, litigation, or other matters

https://patentlyo.com/jobs/2019/01/counsel-large-corporation-multiple-locations.html

142. Given HP’s very large and sophisticated IP legal team, and given their analysis of HP’s pending patent applications such as the HP ’513 Application, and given their role in litigation and other matters, on information and belief HP became aware before the filing of this Complaint that the ’854 Publication issued as the ’229 patent.

HP's Induced Infringement

143. On information and belief, before the filing of this Complaint HP knew that the Accused Products infringe the '229 patent

144. On information and belief, before the filing of this Complaint HP knew that the Accused Products infringe at least claim 1 of the '229 patent when used by customers or other users, when imported by others, and when sold or offered for sale by third parties such as Best Buy.

145. Before the filing of this Complaint, HP induced infringement and continues to induce infringement by actively encouraging third-party resellers to directly infringe at least claim 1 of the '229 patent by facilitating resellers' sales and offers for sale of the Accused Products and actively encouraging such sales and offers for sale. According to HP's 2018 10-K statement, "HP sells a significant portion of its products through third-party distributors and resellers." https://d18rn0p25nwr6d.cloudfront.net/CIK-0000047217/e31dddb7-0e0e-4617-8426-8e1889889288.pdf (page 63). When announcing the launch of the Accused Products, HP routinely states that the Accused Products will be available at Best Buy.

146. Before the filing of this Complaint, HP induced infringement and continues to induce infringement by actively encouraging customers or other users to directly infringe at least claim 1 of the '229 patent. HP has provided with the Accused Products and on the hp.com website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 1 of the '229 patent. For example, HP's support website touts the availability of four display modes on its x360 notebooks. https://support.hp.com/us-en/computer. As another example, HP's user manual for

the ENVY x360 Convertible Notebook PC touts the benefits of multi-mode functionality. http://h10032.www1.hp.com/ctg/Manual/c04642245.pdf (page 8).

HP's Willful Infringement

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

148. According to a May 2022 interview with HP's Chief IP Counsel, HP's IP legal team is "a very large team" that "is between 60 and 70 people globally." https://www.managingip.com/article/2a5d1gc9g5dvsgo5lz8qo/corner-office-podcast-phyllis-turner-brim-chief-ip-counsel-at-hp (3:20 - 3:40). On information and belief, HP has procedures to evaluate whether HP products have freedom to operate in the United States. Given the "very large" size of HP's IP legal team, given HP's procedures, and given HP's knowledge of the '688 patent and the related '229 patent since before the filing of the Complaint, if HP did not investigate whether the Accused Products infringe the '229 patent, then HP was willfully blind to a reasonable likelihood that the Accused Products infringe the '229 patent.

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

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

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

COUNT IV

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

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

HP's Direct Infringement

153. HP has directly infringed and continues to directly infringe, literally and/or equivalently, one or more claims of the '154 patent, including at least claim 11, including by importing, using, selling, and offering for sale in the United States the Accused Products.

154. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) 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:

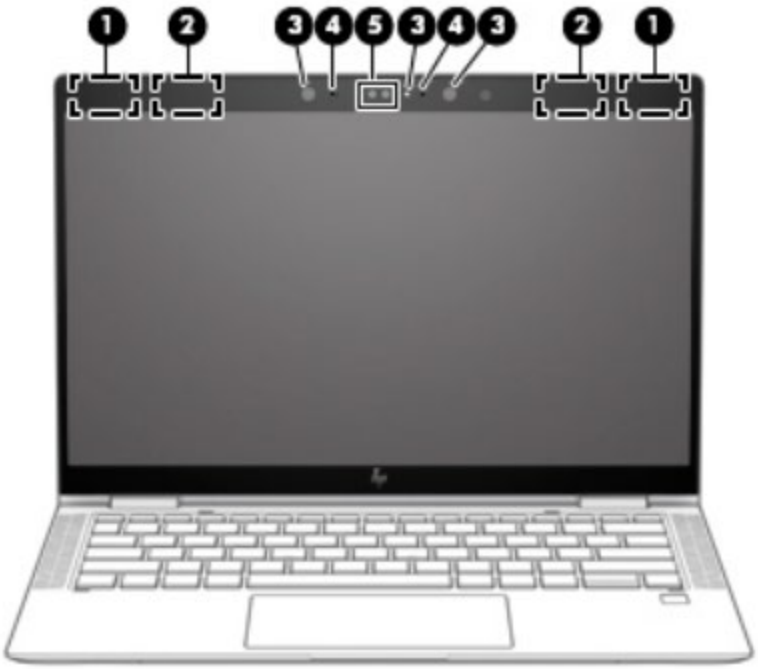
First mode

Second mode

Third mode

155. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a display component comprising a surface and a display screen disposed in the surface of the display component. For example:

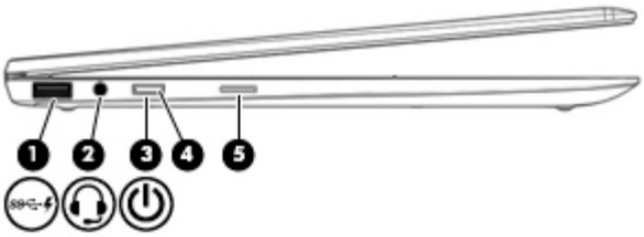
156. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a camera disposed in the surface of the display component. For example:



See, *e.g.*, EliteBook x360 1030 G3 User Guide, p. 8, #5 (camera).

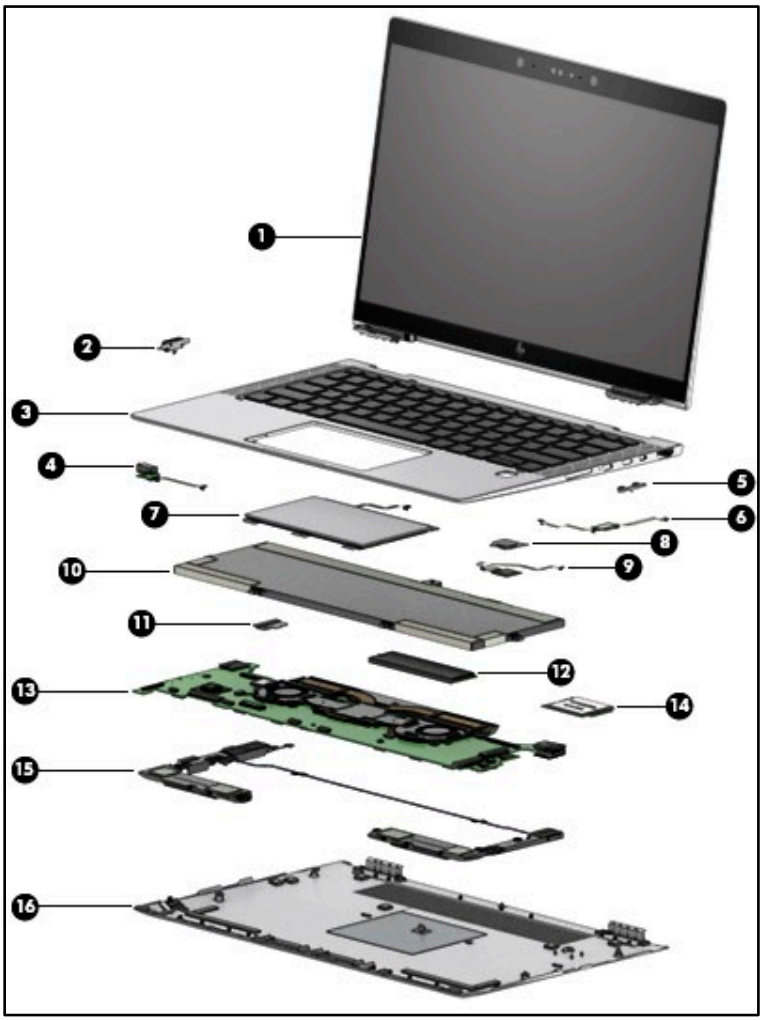
157. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a base comprising a first surface and a second surface, a keyboard disposed in the first surface of the base, and a touchpad disposed in the first surface of the base. For example:

158. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a power button disposed in the second surface of the base. For example:



See, *e.g.*, EliteBook x360 1030 G3 User Guide, p. 6, #3 (power button).

159. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a central processing unit disposed in the base. For example:



(13)	**System board** (includes processor, graphics subsystem with UMA memory, fan/heat sink, and replacement thermal material)

See, *e.g.*, EliteBook x360 1030 G3 Maintenance and Service Guide, pp. 17-20, #13.

160. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) 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., EliteBook x360 1030 G3 Webpage

161. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an orientation sensor configured to generate orientation information indicative of an orientation of at least part of the portable computer. For example:

Sensors	Accelerometer Magnetometer Gyrometer Ambient light sensor (ALS) Hall sensor

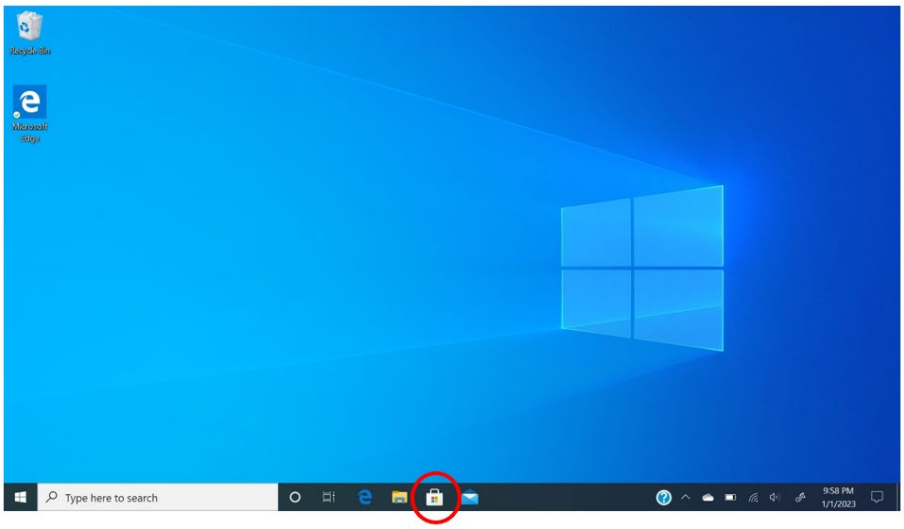
See, e.g., EliteBook x360 1030 G3 Specifications

162. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a display manager configured to detect a current display mode from among the plurality of display modes based at least in part on the orientation information, 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. For example:

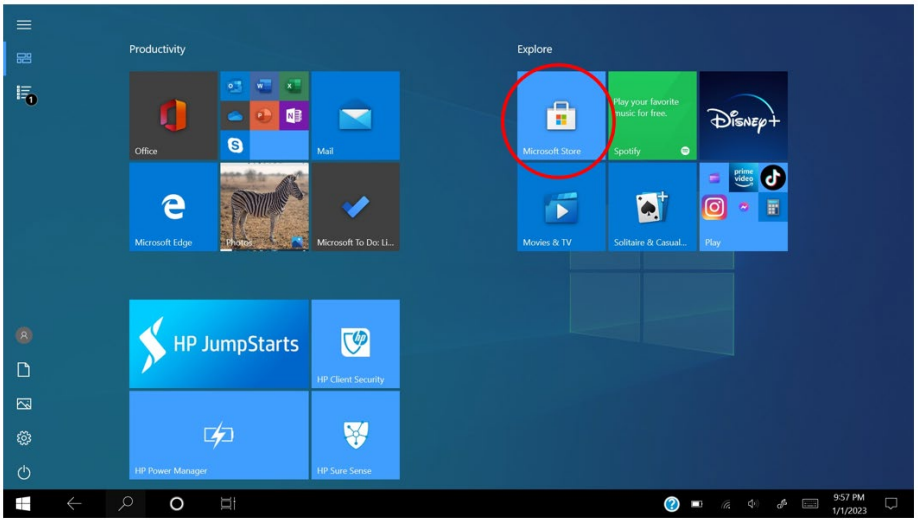
First orientation with first mode

Second orientation with second mode

163. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a display manager configured to enlarge at least some computer content displayed on the display screen when the current display mode transitions from the first mode to the second mode. For example:



Computer content displayed in first mode



Computer content displayed in second mode

HP's Knowledge of the '154 Patent

164. Since at least the filing of this Complaint, HP knows of the '154 patent.

165. On information and belief, HP's knowledge of the '688 patent by at least 2014 would have caused HP to investigate, become aware of, and consider LiTL's related patents, including the '154 patent, before the filing of this Complaint.

HP's Induced Infringement

166. Since at least the filing of this Complaint, HP knows that the Accused Products infringe at least claim 11 of the '154 patent when used by customers or other users, when imported by others, and when sold or offered for sale by third parties such as Best Buy.

167. Since at least the filing of this Complaint, HP induces infringement by actively encouraging third-party resellers to directly infringe at least claim 11 of the '154 patent by facilitating resellers' sales and offers for sale of the Accused Products and actively encouraging such sales and offers for sale. According to HP's 2018 10-K statement, "HP sells a significant portion of its products through third-party distributors and resellers." https://d18rn0p25nwr6d.cloudfront.net/CIK-0000047217/e31dddb7-0e0e-4617-8426-8e1889889288.pdf (page 63). When announcing the launch of the Accused Products, HP routinely states that the Accused Products will be available at Best Buy.

168. Since at least the filing of this Complaint, HP induces infringement by actively encouraging customers or other users to directly infringe at least claim 11 of the '154 patent. HP has provided with the Accused Products and on the hp.com website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 11 of the '154 patent. For example, HP's support website touts the availability of four display modes on its x360 notebooks. https://support.hp.com/us-en/computer. As another example, HP's user manual for the ENVY

x360 Convertible Notebook PC touts the benefits of multi-mode functionality. http://h10032.www1.hp.com/ctg/Manual/c04642245.pdf (page 8).

HP's Willful Infringement

169. HP is willfully infringing at least claim 11 of the '154 patent. HP's offers for sale, sales, and use of the Accused Products with provision of manuals and instruction to purchasers that encourage use that HP knows will infringe the '154 patent demonstrates the willful nature of HP's infringement.

170. According to a May 2022 interview with HP's Chief IP Counsel, HP's IP legal team is "a very large team" that "is between 60 and 70 people globally." https://www.managingip.com/article/2a5d1gc9g5dvsgo5lz8qo/corner-office-podcast-phyllis-turner-brim-chief-ip-counsel-at-hp (3:20 - 3:40). On information and belief, HP has procedures to evaluate whether HP products have freedom to operate in the United States. Given the "very large" size of HP's IP legal team, given HP's procedures, and given HP's knowledge of the '688 patent and the related '154 patent since before the filing of this Complaint, if HP did not investigate whether the Accused Products infringe the '154 patent, then HP was willfully blind to a reasonable likelihood that the Accused Products infringe the '154 patent.

171. The foregoing description of HP'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.

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

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

COUNT V

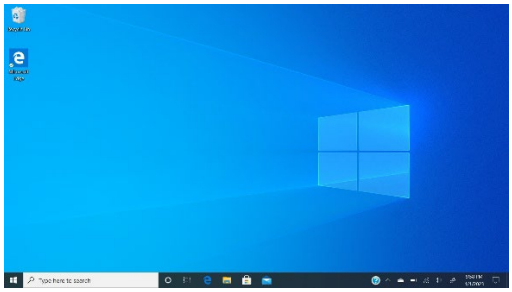
(Infringement of U.S. Patent No. 9,003,315)

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

HP's Direct Infringement

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

176. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) comprise a customized user interface for a computer system with a plurality selectable I/O profiles configured to present computer operations to a user in a format configured to a selected I/O profile on a display component of the computer system, the user interface comprising. For example:



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

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

177. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include at least one processor and a map based graphical user interface, executing on the at least one processor operatively connected to a memory of the computer system. The map based graphical user interface, when executing, is configured to display information on the display component of the computer system. For example:

Processors

Feature	Description
Intel Core i5-8250U	1.6 GHz base frequency Up to 3.4 GHz with Intel Turbo Boost Technology 6 MB cache, 4 cores Intel UHD Graphics 620

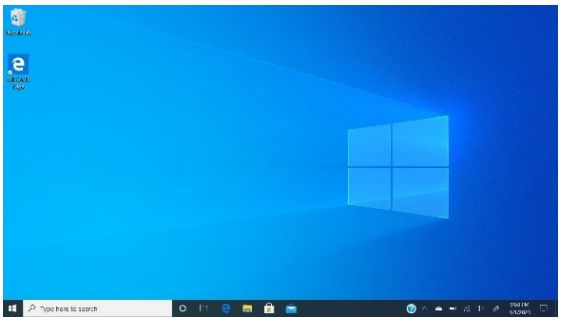
Memory

Feature	Description
Standard	LPDDR3-2133 (transfer rates up to 2133 MT/s) Soldered down, on-board memory (customer non-accessible) Dual channel support

Processor and Memory Specifications

See, e.g., EliteBook x360 1030 G3 Specifications.

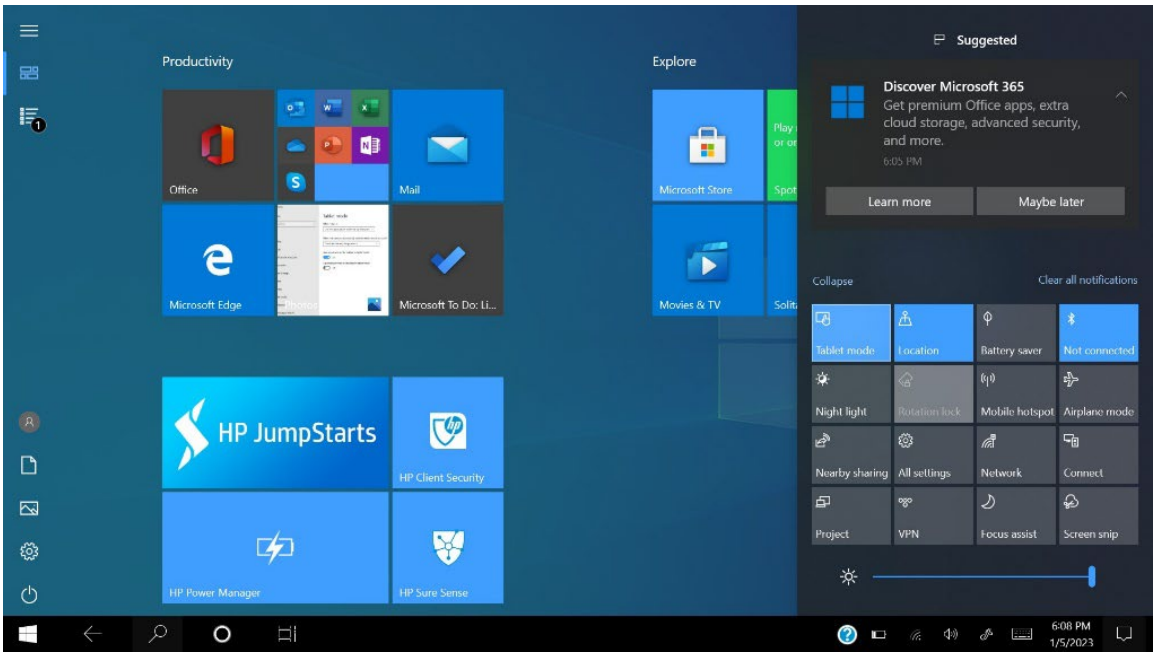
178. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a map based user interface further configured to display a plurality of views of a plurality of visual representations of computer content on the computer system, wherein the computer content includes at least one of selectable digital content, executable computer applications, configurable computer settings, selectable computer operations and passive digital content. For example:



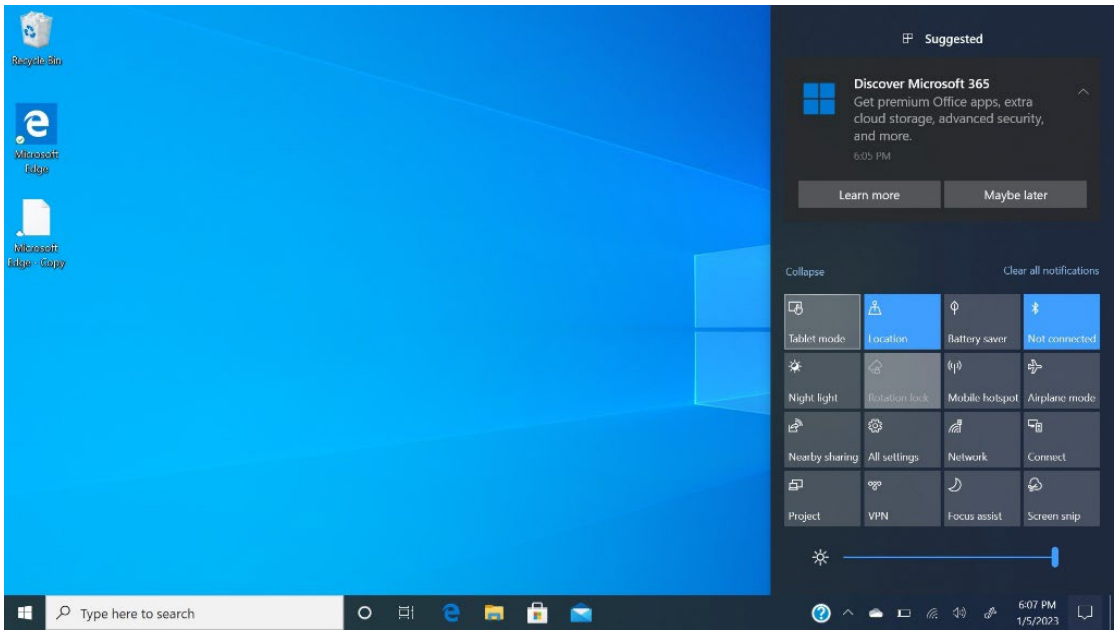
Visual representations of computer content in a first organizational view

Visual representations of computer content in a second organizational view

179. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) display the plurality of visual representations of computer content rendered on the display component, wherein the plurality of visual representations of computer content include an association to a first home view of the plurality of views. For example:

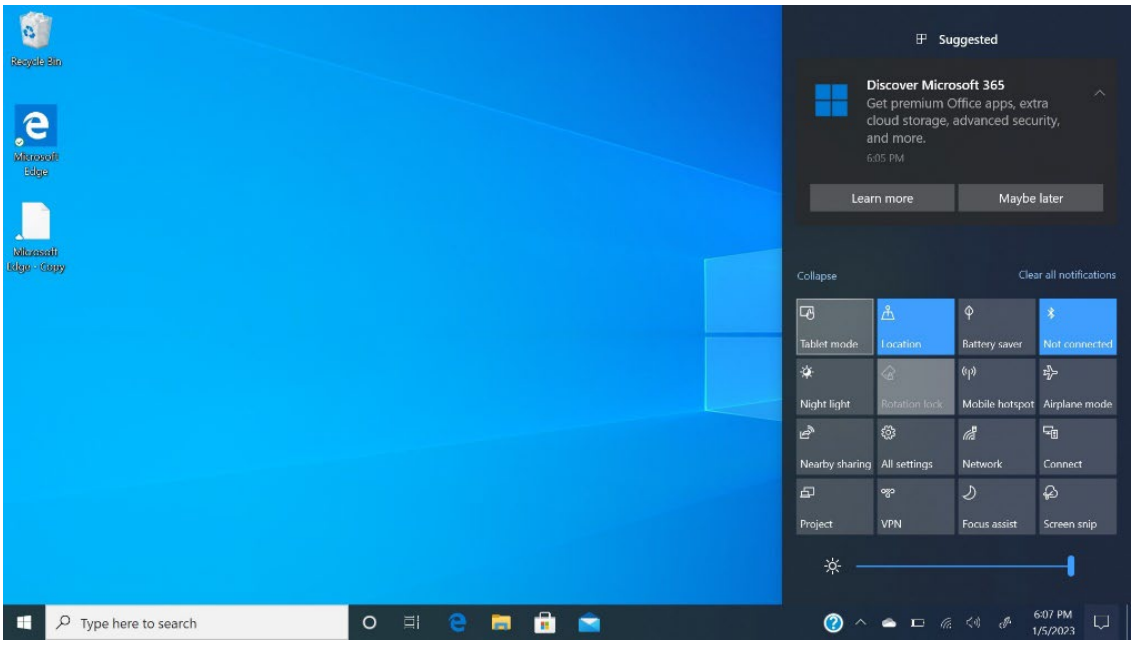


Second organizational view (showing Tablet Mode selected)

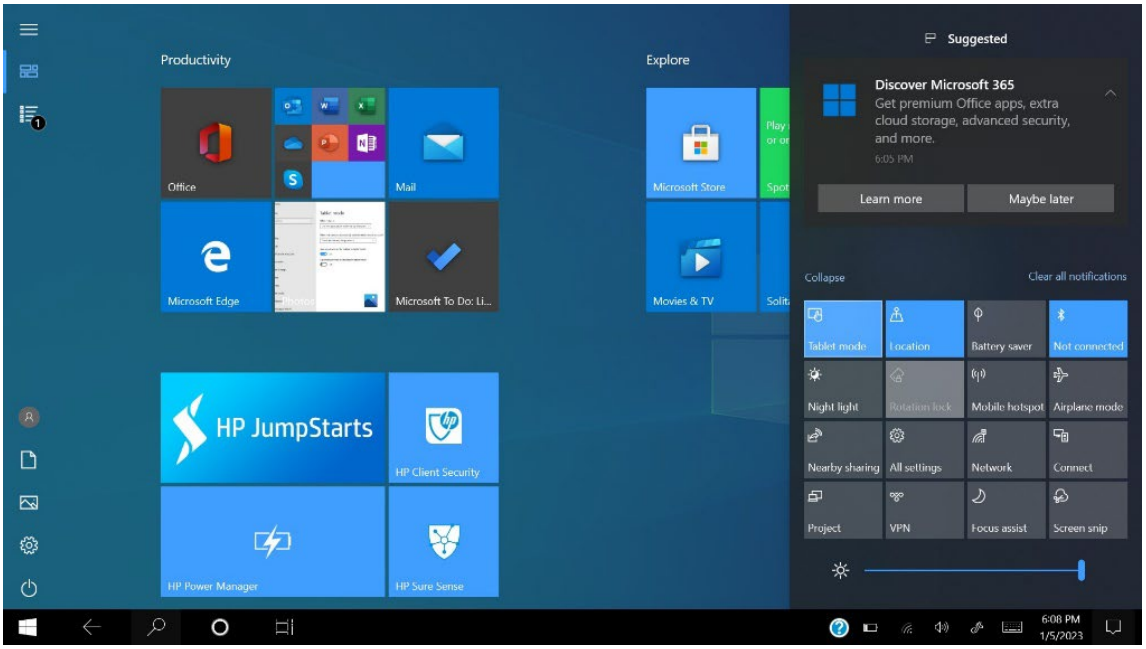


First home view (showing view after Tablet Mode is de-selected)

180. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) display the first home view including a display of the computer content, and wherein the each of the plurality of visual representations is responsive to focus and execution, wherein execution includes selecting the visual representation. For example:

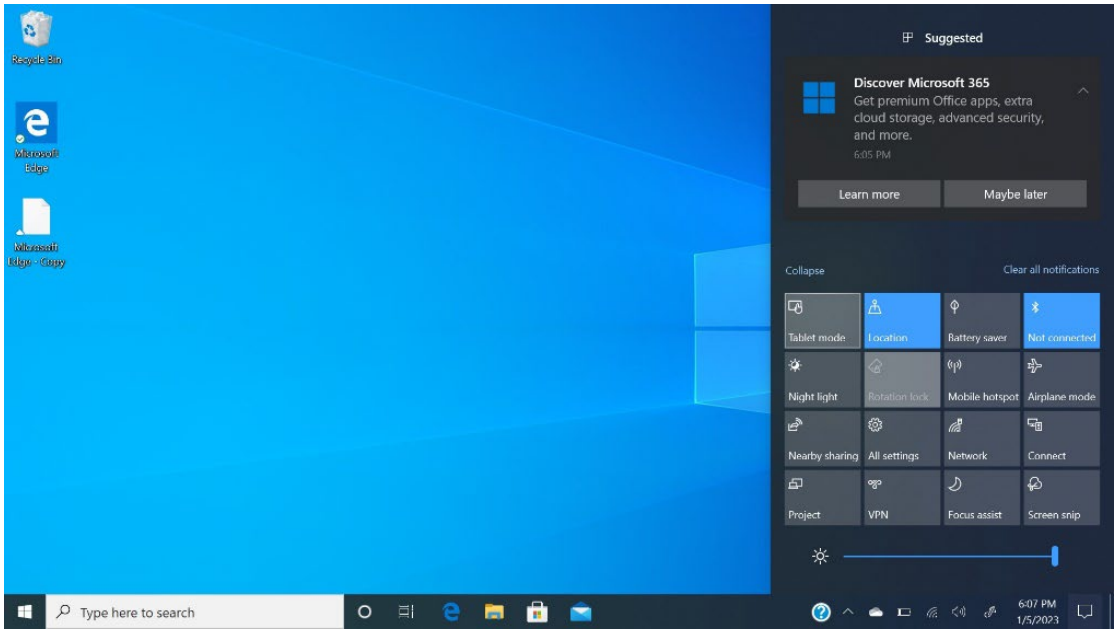


Plurality of visual representations in the first home view
(showing Tablet Mode button responsive to focus)



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

181. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include the first home view as a first organizational view of at least one application and computer content displayed responsive to activation of the system. For example:



First home view

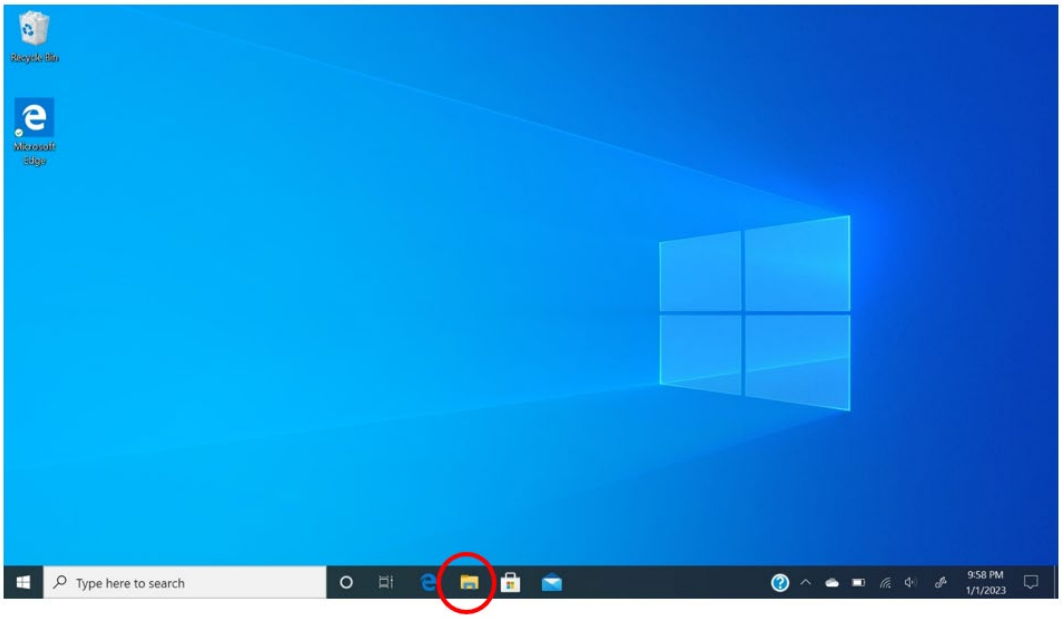
182. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an execution component, executing on the at least one processor, configured to identify at least a first and a second computer system configuration based on sensor input indicating a position of the display component relative to a base component. For example:

First computer system configuration

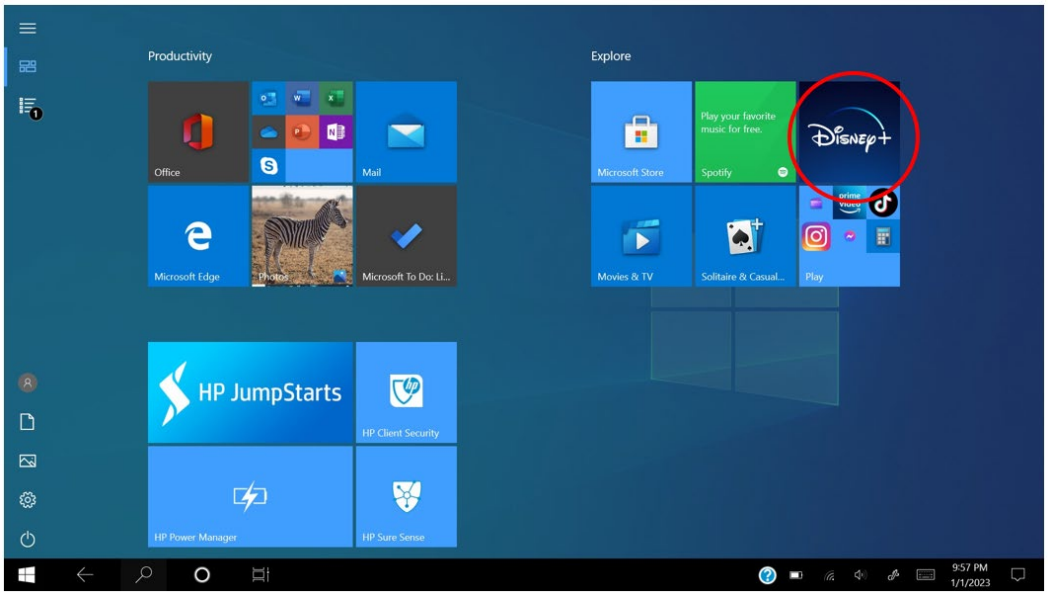
Second computer system configuration

183. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an execution component configured to select, responsive to the sensor input, a first home view from the plurality of views for the first computer system configuration, wherein the first home view is configured to organize a first set of the plurality of visual representations. The execution component is further configured to filter the first set of visual representations to present content that is optimized for viewing in the second system configuration at least in part by identifying

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

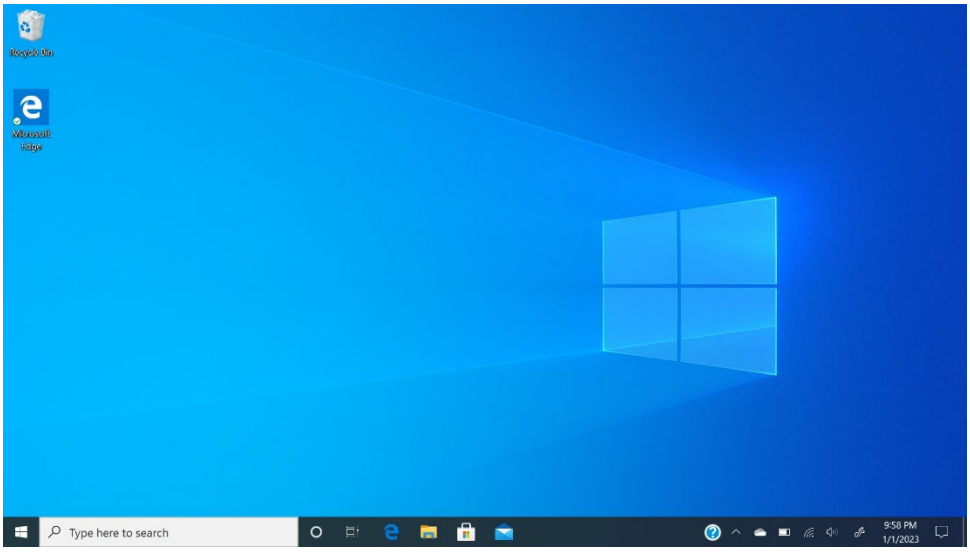


First home view for a first computer system configuration

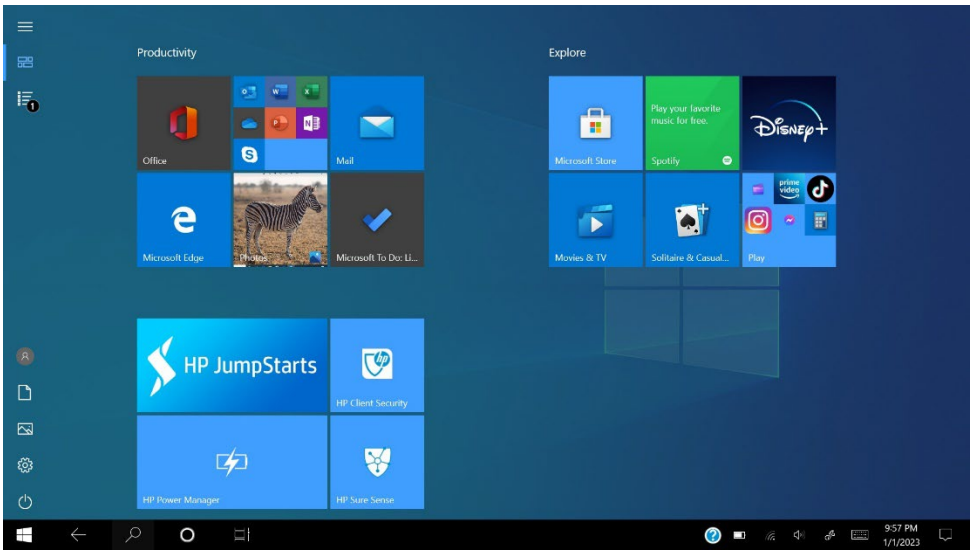


Second organizational view for a second computer system configuration

184. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an execution component configured to transition, automatically in response to the sensor input, the display component between at least the first home view of the plurality of views and a second default content view of the plurality of views, wherein the second default content view is configured to organize the second set of visual representations, wherein the second default content view is a second organizational view of at least one application and computer content, and wherein the sensor input indicates a transition to the second computer system configuration. For example:



First home view



Second default content view

HP's Knowledge of the '315 Patent

185. On information and belief, HP has known of the '315 patent before the filing of this Complaint.

186. The published application of the '315 patent, U.S. Pub. No. 2009/0303676 ("the '676 Publication"), was cited during prosecution of several patent applications filed by HPDC, for which HP Inc. was HPDC's designated agent.

The HP '297 Application

187. For example, on April 25, 2014, HPDC filed U.S. Patent Application No. 14/354,297 ("the HP '297 Application").

188. HPDC filed a Power of Attorney ("POA") designating as its attorneys practitioners associated with Customer No. 22879, which, on information and belief, is HP Inc.'s USPTO Customer Number. The transmittal cover document for the POA was signed by Mark J. Kupets; on information and belief, Mr. Kupets was a patent attorney at the time for HP Inc.'s predecessor, Hewlett-Packard Company.

189. On June 18, 2015, Mr. Kupets submitted an IDS that identified one patent and three published patent applications owned by LiTL, including the '676 Publication.

The HP '453 Application

190. As another example, on November 9, 2009, U.S. Patent Application No. 12/614,453 ("the HP '453 Application") was filed by an applicant who designated HP Inc.'s predecessor, Hewlett-Packard Company, as his attorney before the USPTO.

191. On March 30, 2011, Theodore C. McCullough submitted an IDS that identified the '676 Publication. On information and belief, as indicated by the IDS cover page, Mr. McCullough was a Hewlett-Packard Company patent attorney at the time.

192. On October 5, 2011, the USPTO mailed an office action to Hewlett-Packard Company rejecting all pending claims as anticipated and including a Notice of References Cited that identified the ’676 Publication.

The HP ’044 Application

193. As another example, on April 27, 2012, U.S. Patent Application No. 13/458,044 (“the HP ’044 Application”) was filed by applicants who designated HP Inc.’s predecessor, Hewlett-Packard Company, as their attorney before the USPTO.

194. On February, 27, 2014, the USPTO mailed an office action to Hewlett-Packard Company rejecting all pending claims as obvious and including a Notice of References Cited that identified one patent and three published patent applications owned by LiTL, including the ’676 Publication.

The HP ’739 Application

195. As another example, on April 27, 2012, U.S. Patent Application No. 13/458,044 (“the HP ’044 Application”) was filed by an applicant who designated HP Inc.’s predecessor, Hewlett-Packard Company, as his attorney before the USPTO.

196. On April 15, 2014, the USPTO mailed an office action to Hewlett-Packard Company rejecting all pending claims as obvious and including a Notice of References Cited that identified one patent and three published patent applications owned by LiTL, including the ’676 Publication.

197. On information and belief, HP has a very large IP legal team that carefully analyzes HP’s pending patent applications to determine their value to HP, and whose members participate in cross functional teams to provide support in licensing, litigation, or other matters. HP routinely identifies such responsibilities in job postings for its patent development group.

198. Given HP's very large and sophisticated IP legal team, and given their analysis of HP's pending patent applications such as the HP '297, '453, '044, and '739 Applications, and given their role in litigation and other matters, on information and belief HP became aware before the filing of this Complaint that the '676 Publication issued as the '315 patent.

HP's Induced Infringement

199. On information and belief, HP has known before the filing of the Complaint that the Accused Products infringe at least claim 1 of the '315 patent when used by customers or other users, when imported by others, and when sold or offered for sale by third parties such as Best Buy.

200. Before the filing of this Complaint, HP induced infringement and continues to induce infringement by actively encouraging third-party resellers to directly infringe at least claim 1 of the '315 patent by facilitating resellers' sales and offers for sale of the Accused Products and actively encouraging such sales and offers for sale. According to HP's 2018 10-K statement, "HP sells a significant portion of its products through third-party distributors and resellers." https://d18rn0p25nwr6d.cloudfront.net/CIK-0000047217/e31dddb7-0e0e-4617-8426-8e1889889288.pdf (page 63). When announcing the launch of the Accused Products, HP routinely states that the Accused Products will be available at Best Buy.

201. Before the filing of this Complaint, HP induced infringement and continues to induce infringement by actively encouraging customers or other users to directly infringe at least claim 1 of the '315 patent. HP has provided with the Accused Products and on the hp.com website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 1 of the '315 patent. For example, HP's support website touts the availability of four display modes on its x360

notebooks. https://support.hp.com/us-en/computer. As another example, HP's user manual for the ENVY x360 Convertible Notebook PC touts the benefits of multi-mode functionality. http://h10032.www1.hp.com/ctg/Manual/c04642245.pdf (page 8).

HP's Willful Infringement

202. HP has willfully infringed at least claim 1 of the '315 patent. HP's offers for sale, sales, and use of the Accused Products with provision of manuals and instruction to purchasers that encourage use that HP knows will infringe the '315 patent demonstrates the willful nature of HP's infringement.

203. According to a May 2022 interview with HP's Chief IP Counsel, HP's IP legal team is "a very large team" that "is between 60 and 70 people globally." https://www.managingip.com/article/2a5d1gc9g5dvsgo5lz8qo/corner-office-podcast-phyllis-turner-brim-chief-ip-counsel-at-hp (3:20 - 3:40). On information and belief, HP has procedures to evaluate whether HP products have freedom to operate in the United States. Given the "very large" size of HP's IP legal team, given HP's procedures, and given HP's knowledge of the '688 patent and the related '315 patent, if HP did not investigate whether the Accused Products infringe the '315 patent, then HP was willfully blind to a reasonable likelihood that the Accused Products infringe the '315 patent.

204. The foregoing description of HP'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.

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

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

COUNT VI

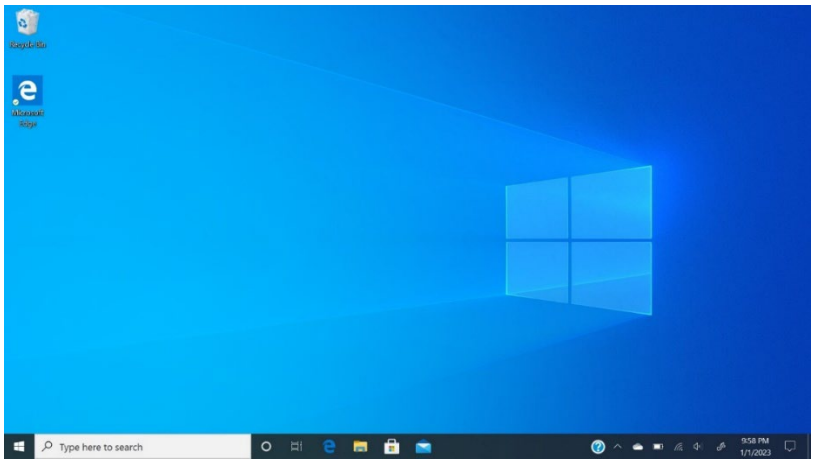
(Infringement of U.S. Patent No. 9,880,715)

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

HP's Direct Infringement

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

209. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a customized user interface to display computer content on a display component of a computer system including a keyboard. For example:



Customized user interface

210. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a user interface comprising at least one processor operatively connected to a memory of the computer system. For example:

Processors

Feature	Description
Intel Core i5-8250U	1.6 GHz base frequency Up to 3.4 GHz with Intel Turbo Boost Technology 6 MB cache, 4 cores Intel UHD Graphics 620

Memory

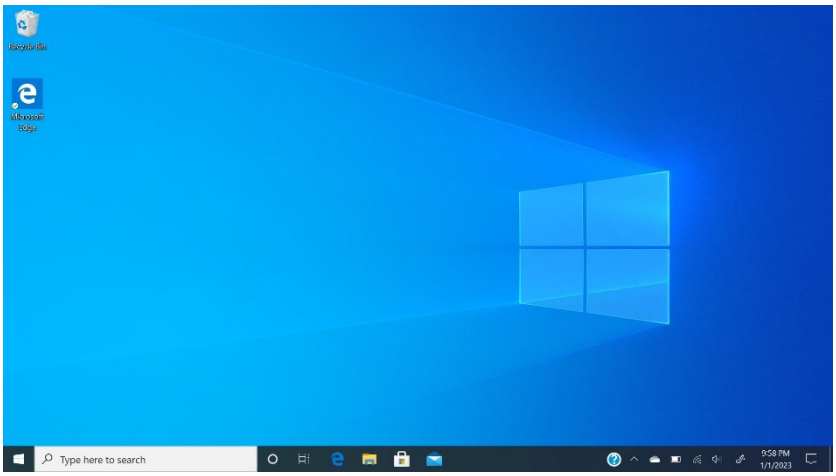
Feature	Description
Standard	LPDDR3-2133 (transfer rates up to 2133 MT/s) Soldered down, on-board memory (customer non-accessible) Dual channel support
Configurations	8 GB LPDDR3-2133 SDRAM 16 GB LPDDR3-2133 SDRAM
Maximum	16 GB

Processor and Memory Specifications

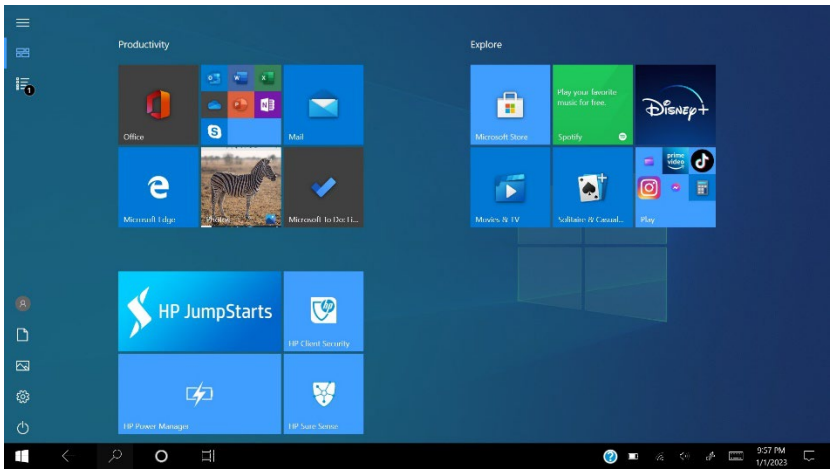
See, e.g., EliteBook x360 1030 G3 Specifications.

211. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) 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:

212. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a graphical user interface configured to display a plurality of views of a plurality of visual representations of computer content. For example, the EliteBook x360 1030 G3 is configured to display a home screen in laptop mode and a home screen in tablet mode:

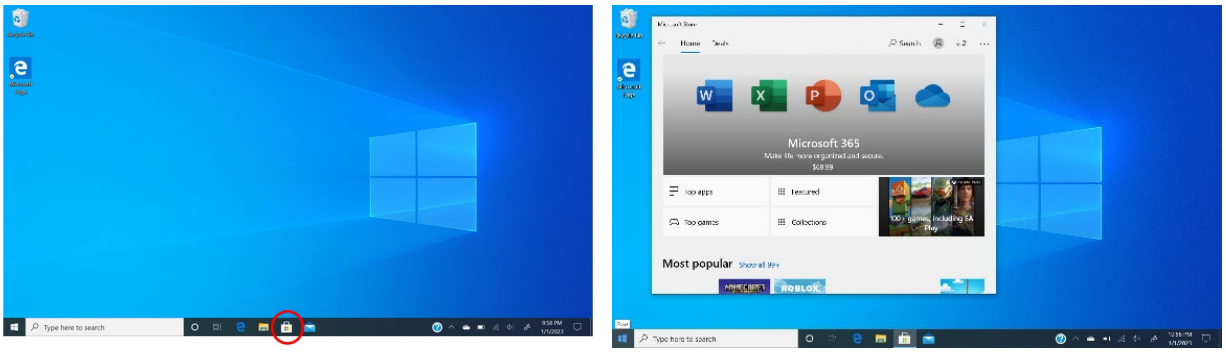


First view

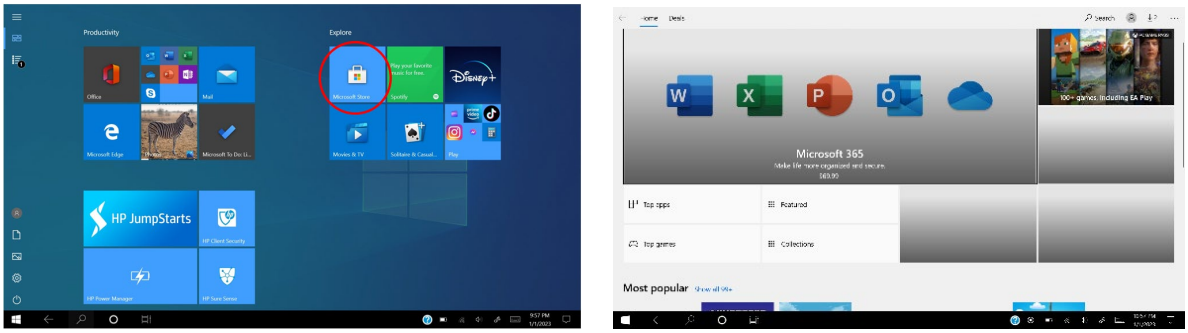


Second view

213. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include computer content that includes at least one of selectable digital content, selectable computer operations and passive digital content. For example, the Microsoft Store app can be selected from the task bar in laptop mode and in tablet mode:



Microsoft Store selected in first view



Microsoft Store selected in second view

214. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an execution component, executing on the at least one processor, configured to detect a current computer system configuration from at least a first computer system configuration where the keyboard is operable to receive input from an operator of the computer system to control the computer system and a second computer system configuration where the keyboard is inoperable to receive input from the operator of the computer system to control the computer system; select one of the plurality of views for display on the computer system in response to the detected current computer system configuration; and transition the display component to the selected one of the plurality of views. For example, the keyboard in the EliteBook x360 1030 G3 is operable in clamshell mode and inoperable in tent, stand, and tablet modes:

First computer system configuration

Second computer system configuration

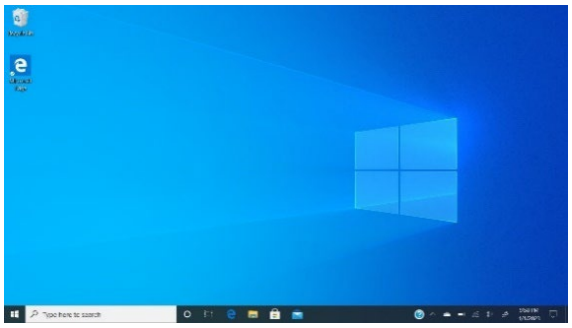
Enable or disable the keyboard

You can change the position of your x360 notebook to enable or disable the keyboard and power key (depending on the model).

To enable the keyboard and the power button key on an x360 notebook, place the notebook in clamshell mode.

To disable the keyboard on an x360 notebook, place the computer in stand mode, tent mode, or tablet mode.

See, e.g., HP x360 Notebook PC Modes.



First view

Second view

HP's Knowledge of the '715 Patent

215. Since at least the filing of this Complaint, HP knows of the '715 patent.

216. On information and belief, HP's knowledge of the '688 patent by at least 2014 would have caused HP to investigate, become aware of, and consider LiTL's related patents, including the '715 patent, before the filing of this Complaint.

HP's Induced Infringement

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

218. Since at least the filing of this Complaint, HP induces infringement by actively encouraging third-party resellers to directly infringe at least claim 1 of the '715 patent by facilitating resellers' sales and offers for sale of the Accused Products and actively encouraging such sales and offers for sale. According to HP's 2018 10-K statement, "HP sells a significant

portion of its products through third-party distributors and resellers." https://d18rn0p25nwr6d.cloudfront.net/CIK-0000047217/e31dddb7-0e0e-4617-8426-8e1889889288.pdf (page 63). When announcing the launch of the Accused Products, HP routinely states that the Accused Products will be available at Best Buy.

219. Since at least the filing of this Complaint, HP induces infringement by actively encouraging customers or other users to directly infringe at least claim 1 of the '715 patent. HP has provided with the Accused Products and on the hp.com website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 1 of the '715 patent. For example, HP's support website touts the availability of four display modes on its x360 notebooks. https://support.hp.com/us-en/computer. As another example, HP's user manual for the ENVY x360 Convertible Notebook PC touts the benefits of multi-mode functionality. http://h10032.www1.hp.com/ctg/Manual/c04642245.pdf (page 8).

HP's Willful Infringement

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

221. According to a May 2022 interview with HP's Chief IP Counsel, HP's IP legal team is "a very large team" that "is between 60 and 70 people globally." https://www.managingip.com/article/2a5d1gc9g5dvsgo5lz8qo/corner-office-podcast-phyllis-turner-brim-chief-ip-counsel-at-hp (3:20 - 3:40). On information and belief, HP has procedures to evaluate whether HP products have freedom to operate in the United States. Given the "very

large" size of HP's IP legal team, given HP's procedures, and given HP's knowledge of the '688 patent and the related '715 patent since before the filing of this Complaint, if HP did not investigate whether the Accused Products infringe the '715 patent, then HP was willfully blind to a reasonable likelihood that the Accused Products infringe the '715 patent.

222. The foregoing description of HP'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.

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

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

COUNT VII

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

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

HP's Direct Infringement

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

227. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include one non-transitory computer-readable storage medium storing processor-executable instructions that, when executed by at least one processor in a computer system comprising a display and a keyboard and being configurable between a plurality of computer system configurations, cause the at least one processor to perform a method. For example:

Processors

Feature	Description
Intel Core i5-8250U	1.6 GHz base frequency Up to 3.4 GHz with Intel Turbo Boost Technology 6 MB cache, 4 cores Intel UHD Graphics 620

Memory

Feature	Description
Standard	LPDDR3-2133 (transfer rates up to 2133 MT/s) Soldered down, on-board memory (customer non-accessible) Dual channel support
Configurations	8 GB LPDDR3-2133 SDRAM 16 GB LPDDR3-2133 SDRAM
Maximum	16 GB

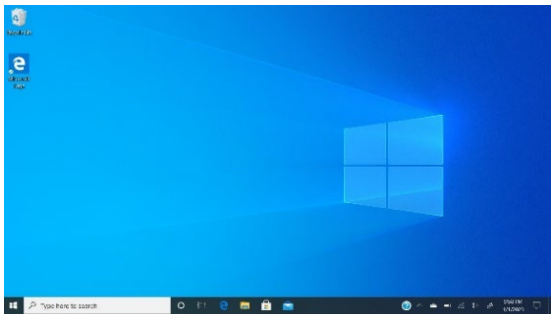
Processor and Memory Specifications

See, e.g., EliteBook x360 1030 G3 Specifications.

First computer system configuration

Second computer system configuration

228. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a processor to perform a method displaying a plurality of views of a plurality of visual representations of computer content. For example:



First view in a first configuration

Second view in a second configuration

229. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a processor to perform a method detecting a current computer system configuration from at least a first computer system configuration of the plurality of computer system configurations where the keyboard is operable to receive input from an operator of the computer system to control the computer system and a second computer system configuration of the plurality of computer system configurations where the keyboard is inoperable to receive input from the operator of the computer system to control the computer system. For example:

First computer system configuration

Second computer system configuration

Enable or disable the keyboard

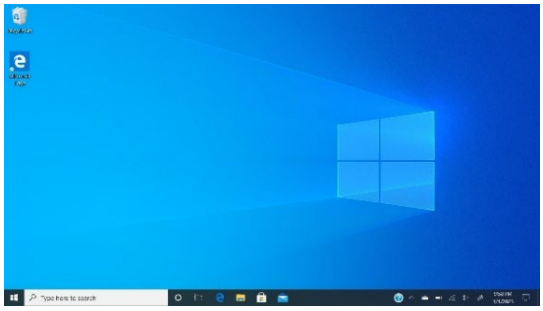
You can change the position of your x360 notebook to enable or disable the keyboard and power key (depending on the model).

To enable the keyboard and the power button key on an x360 notebook, place the notebook in clamshell mode.

To disable the keyboard on an x360 notebook, place the computer in stand mode, tent mode, or tablet mode.

See, e.g., HP x360 Notebook PC Modes

230. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a processor to perform a method selecting one of the plurality of views for display on the computer system in response to the detected current computer system configuration; transitioning to the selected one of the plurality of views; and displaying the selected one of the plurality of views. For example:



First view in a first configuration

Second view in a second configuration

HP's Knowledge of the '818 Patent

231. Since at least the filing of this Complaint, HP knows of the '818 patent.

232. On information and belief, HP's knowledge of the '688 patent by at least 2014 would have caused HP to investigate, become aware of, and consider LiTL's related patents, including the '818 patent, before the filing of this Complaint.

HP's Induced Infringement

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

234. Since at least the filing of this Complaint, HP induces infringement by actively encouraging third-party resellers to directly infringe at least claim 1 of the ’818 patent by facilitating resellers’ sales and offers for sale of the Accused Products and actively encouraging such sales and offers for sale. According to HP’s 2018 10-K statement, “HP sells a significant portion of its products through third-party distributors and resellers.” https://d18rn0p25nwr6d.cloudfront.net/CIK-0000047217/e31dddb7-0e0e-4617-8426-8e1889889288.pdf (page 63). When announcing the launch of the Accused Products, HP routinely states that the Accused Products will be available at Best Buy.

235. Since at least the filing of this Complaint, HP induces infringement by actively encouraging customers or other users to directly infringe at least claim 1 of the ’818 patent. HP has provided with the Accused Products and on the hp.com website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 1 of the ’818 patent. For example, HP’s support website touts the availability of four display modes on its x360 notebooks. https://support.hp.com/us-en/computer. As another example, HP’s user manual for the ENVY x360 Convertible Notebook PC touts the benefits of multi-mode functionality. http://h10032.www1.hp.com/ctg/Manual/c04642245.pdf (page 8).

HP’s Willful Infringement

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

237. According to a May 2022 interview with HP's Chief IP Counsel, HP's IP legal team is "a very large team" that "is between 60 and 70 people globally." https://www.managingip.com/article/2a5d1gc9g5dvsgo5lz8qo/corner-office-podcast-phyllis-turner-brim-chief-ip-counsel-at-hp (3:20 - 3:40). On information and belief, HP has procedures to evaluate whether HP products have freedom to operate in the United States. Given the "very large" size of HP's IP legal team, given HP's procedures, and given HP's knowledge of the '688 patent and the related '818 patent since before the filing of this Complaint, if HP did not investigate whether the Accused Products infringe the '818 patent, then HP was willfully blind to a reasonable likelihood that the Accused Products infringe the '818 patent.

238. The foregoing description of HP'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.

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

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

COUNT VIII

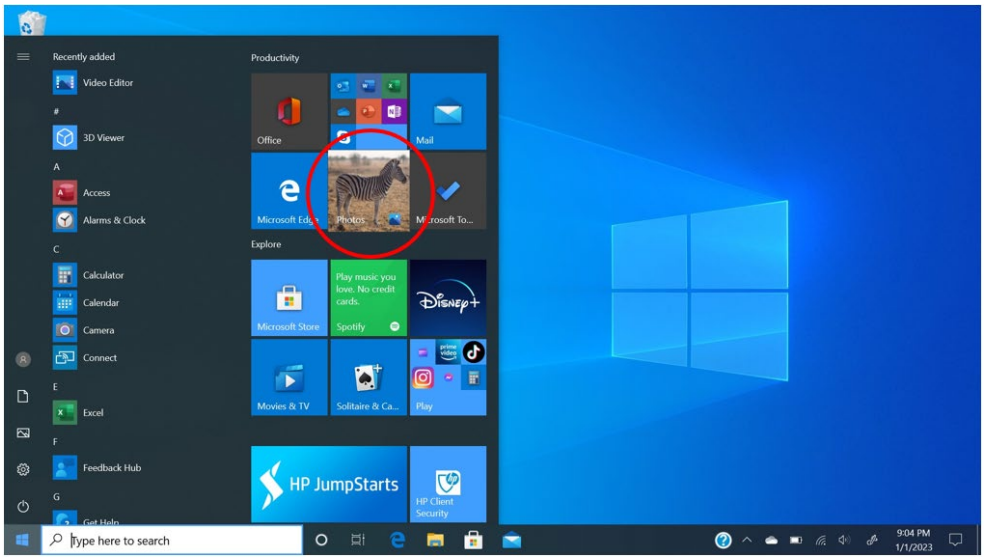
(Infringement of U.S. Patent No. 8,612,888)

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

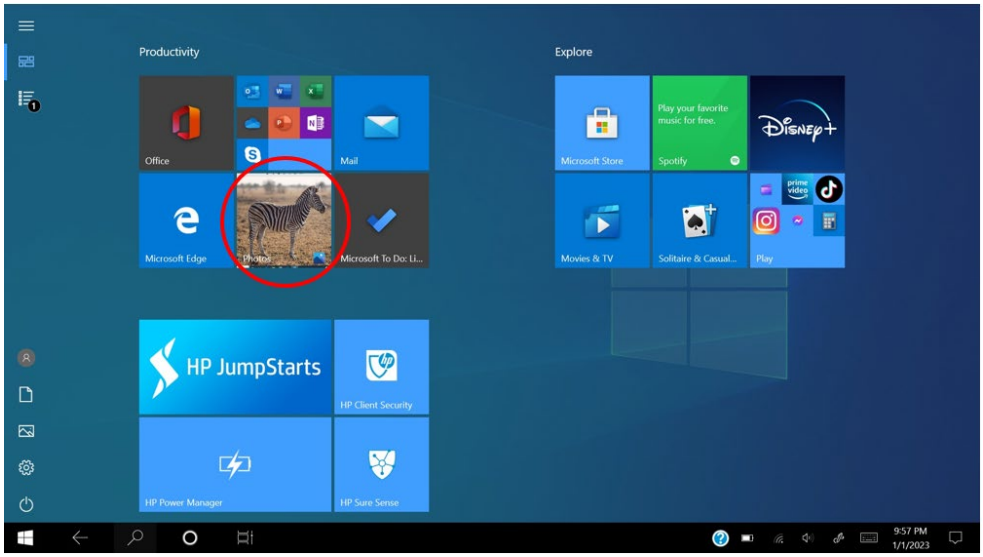
HP's Direct Infringement

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

243. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a system for accessing and managing digital media libraries with a plurality of selectable I/O profiles. For example, the EliteBook x360 1030 G3 includes the Microsoft Photos app, which can be accessed in a first and second I/O profile:



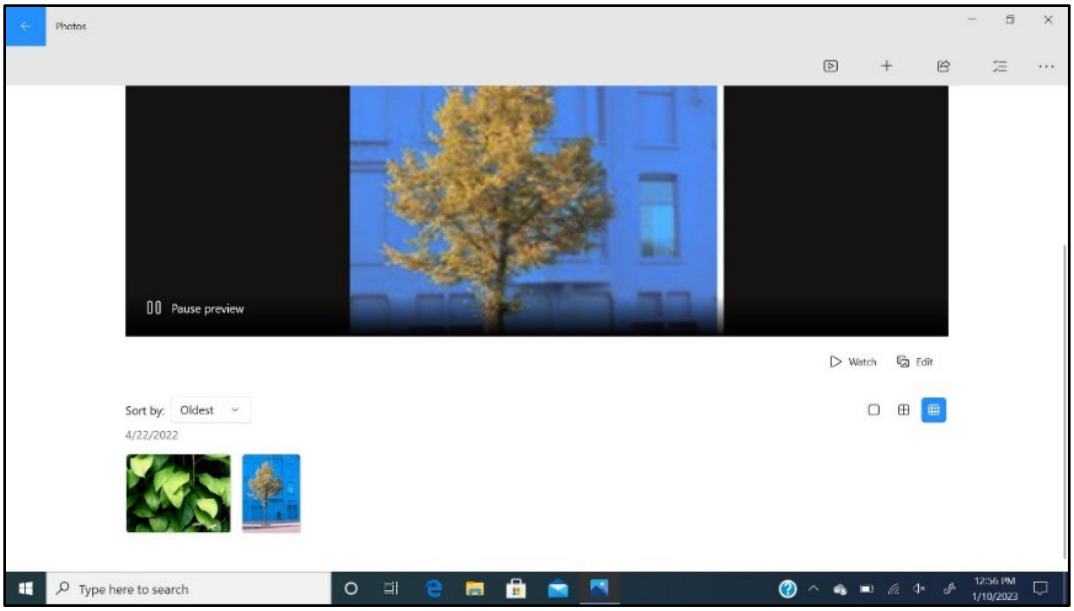
Microsoft Photos app in a first I/O profile



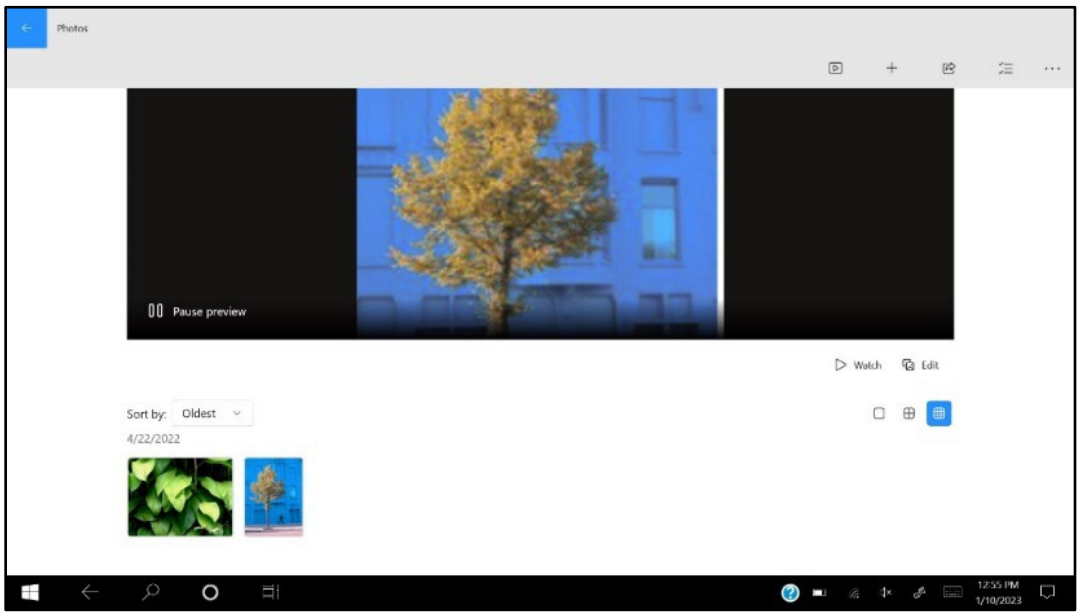
Microsoft Photos app in a second I/O profile

244. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) 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 EliteBook x360 1030 G3 includes a laptop mode and a tablet mode, and a different view associated with each of the different I/O profiles, and each of these views has a plurality of visual representations of digital content:

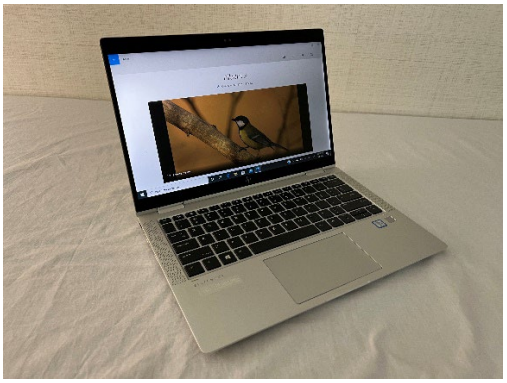


Microsoft Photos app in a first I/O profile with a first view

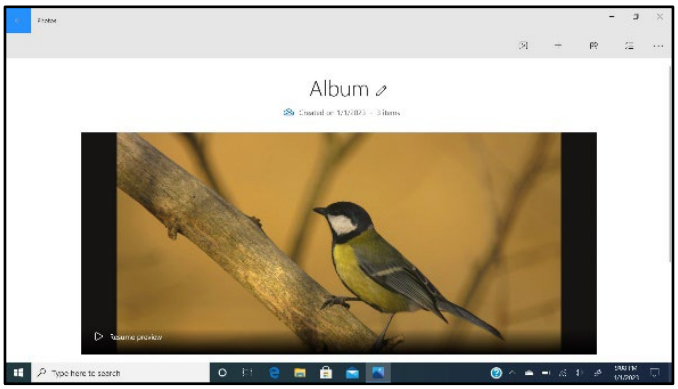


Microsoft Photos app in a second I/O profile with a second view

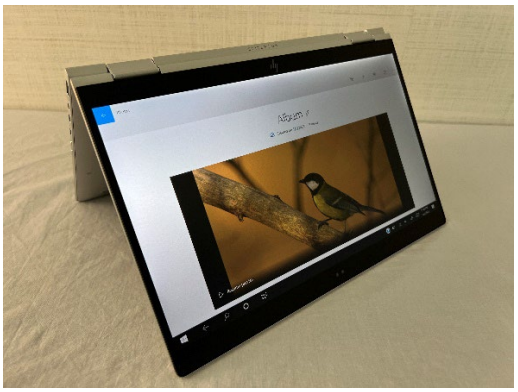
245. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an execution component configured to transition the graphical user interface between the plurality of views in response to selection of an I/O profile. For example, the EliteBook x360 1030 G3 is configured to transition between a plurality of views in response to selection of laptop and tablet modes:



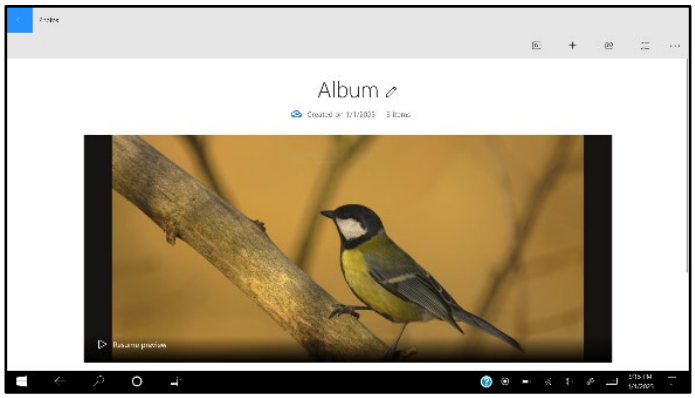
First physical configuration



First I/O profile with a first view



Second physical configuration



Second I/O profile with a second view

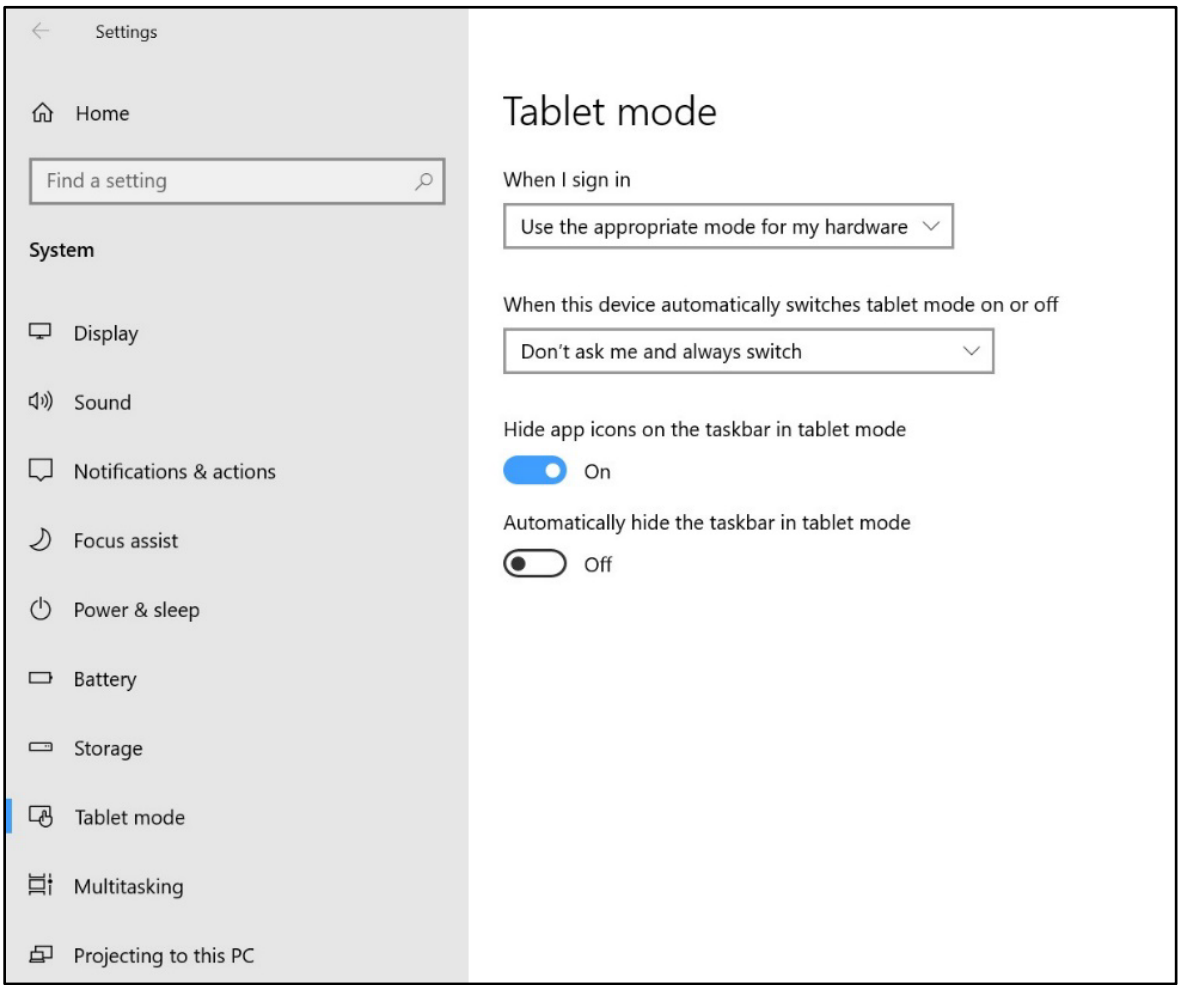
246. Selecting the I/O profile within the Accused Products (*e.g.*, the EliteBook x360 1030 G3) includes responding to user rotation of a display component of the computing device about a longitudinal axis running along an interface between the display component and a base of the streamlined computing 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 EliteBook x360 1030 G3 has a first physical configuration with a first view when rotated from a closed mode to a laptop mode, and has a second physical configuration with a second view when rotated from laptop mode to an easel mode.

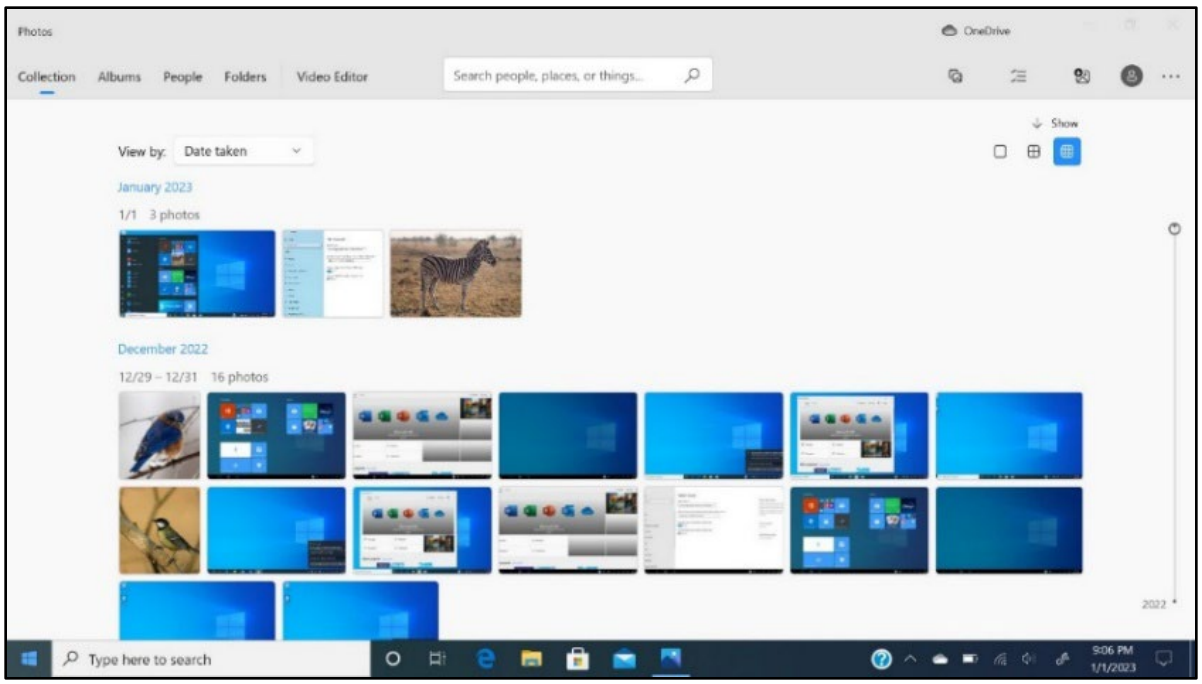
First physical configuration with a first view

Second physical configuration with a second view

247. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a view selector component configured to transition between the plurality of views in response to activation. For example:

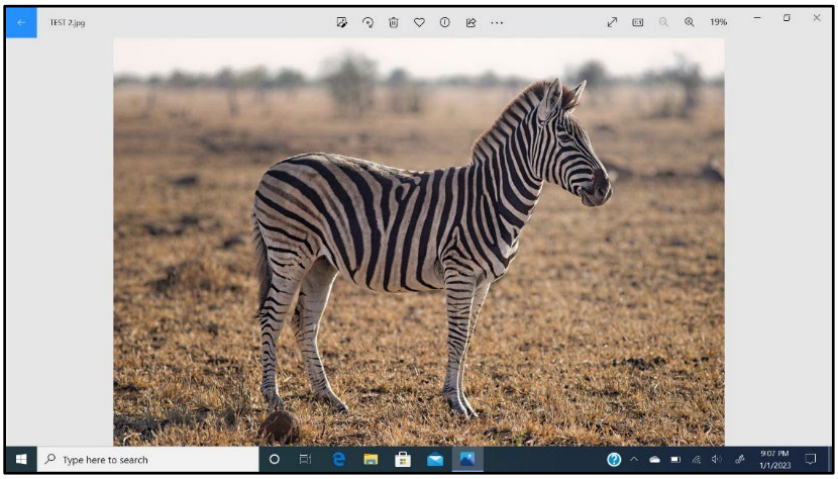


248. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include a storage component configured to store an association between at least one of a plurality of visual representations and digital media content. For example, the EliteBook x360 1030 G3 includes the Microsoft Photos app, which is configured to store an association between thumbnail previews of content and digital media content:



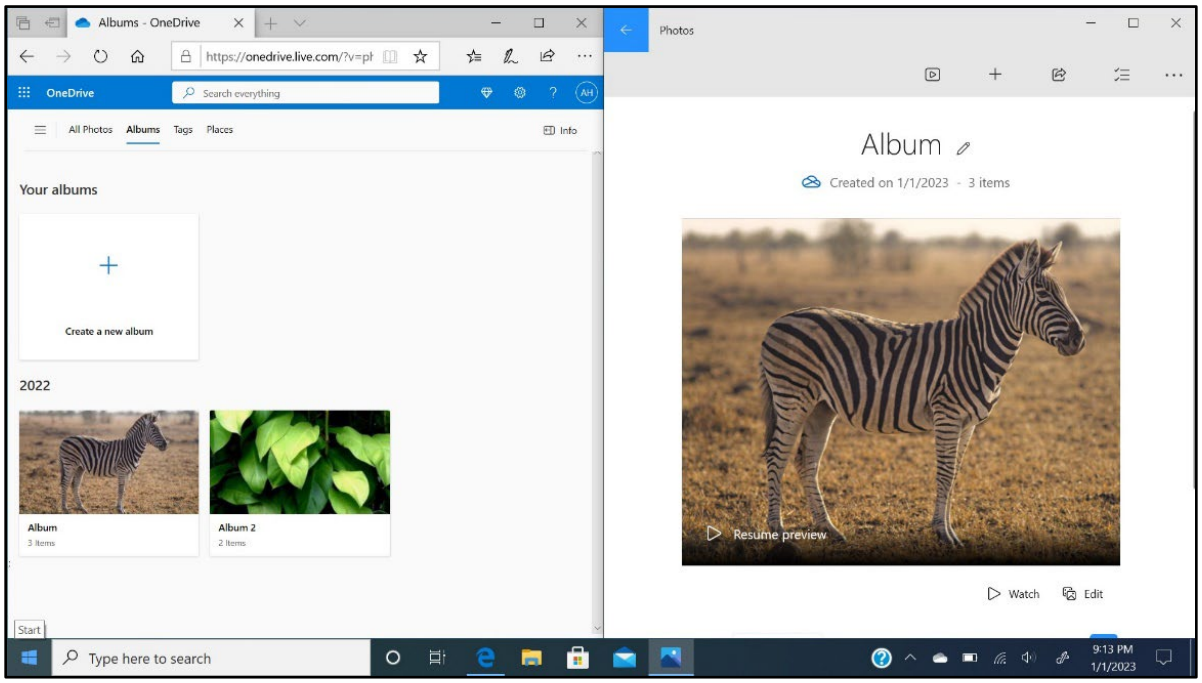
Microsoft Photos app

249. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) include an execution component further configured to execute the association with the at least one of the plurality of visual representations with digital media content in response to selection and transition the display to a view of the digital media content in response to the act of executing the association. For example, selecting a thumbnail preview in the Microsoft Photos app transitions to a view of the digital media content:



Digital media content in Microsoft Photos app

250. The Accused Products (*e.g.*, the EliteBook x360 1030 G3) 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 EliteBook x360 1030 G3 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) that can include both user digital media content and referenced digital media content:



OneDrive album in Microsoft Photos app

HP's Knowledge of the '888 Patent

251. Since at least the filing of this Complaint, HP knows of the '888 patent.

252. On information and belief, HP's knowledge of the '688 patent by at least 2014 would have caused HP to investigate, become aware of, and consider LiTL's related patents, including the '888 patent, before the filing of this Complaint.

HP's Induced Infringement

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

254. Since at least the filing of this Complaint, HP induces infringement by actively encouraging third-party resellers to directly infringe at least claim 27 of the '888 patent by facilitating resellers' sales and offers for sale of the Accused Products and actively encouraging such sales and offers for sale. According to HP's 2018 10-K statement, "HP sells a significant portion of its products through third-party distributors and resellers." https://d18rn0p25nwr6d.cloudfront.net/CIK-0000047217/e31dddb7-0e0e-4617-8426-8e1889889288.pdf (page 63). When announcing the launch of the Accused Products, HP routinely states that the Accused Products will be available at Best Buy.

255. Since at least the filing of this Complaint, HP induces infringement by actively encouraging customers or other users to directly infringe at least claim 27 of the '888 patent. HP has provided with the Accused Products and on the hp.com website, user manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claim 27 of the '888 patent. For example, HP's support website touts the availability of four display modes on its x360 notebooks. https://support.hp.com/us-en/computer. As another example, HP's user manual for the ENVY x360 Convertible Notebook PC touts the benefits of multi-mode functionality. http://h10032.www1.hp.com/ctg/Manual/c04642245.pdf (page 8).

HP's Willful Infringement

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

257. According to a May 2022 interview with HP's Chief IP Counsel, HP's IP legal team is "a very large team" that "is between 60 and 70 people globally." https://www.managingip.com/article/2a5d1gc9g5dvsgo5lz8qo/corner-office-podcast-phyllis-turner-brim-chief-ip-counsel-at-hp (3:20 - 3:40). On information and belief, HP has procedures to evaluate whether HP products have freedom to operate in the United States. Given the "very large" size of HP's IP legal team, given HP's procedures, and given HP's knowledge of the '688 patent and the related '888 patent since before the filing of this Complaint, if HP did not investigate whether the Accused Products infringe the '888 patent, then HP was willfully blind to a reasonable likelihood that the Accused Products infringe the '888 patent.

258. The foregoing description of HP'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.

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

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

REQUEST FOR RELIEF

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

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

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

c. Awarding LiTL damages adequate to compensate it for HP’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 HP’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 HP’s willful infringement of the asserted patents; and

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

DEMAND FOR JURY TRIAL

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

Date: February 1, 2023

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/Adam W. Poff

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

Counsel for LiTL LLC

OF COUNSEL:

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