IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LITL LLC, Plaintiff, v. ASUSTEK COMPUTER INC., ASUS GLOBAL PTE. LTD., and ASUS TECHNOLOGY PTE. LIMITED, Defendants.	Civil Action No. _____ **JURY TRIAL DEMANDED**

COMPLAINT

Plaintiff LiTL LLC ("Plaintiff" or "LiTL") brings this action for patent infringement against Defendants ASUSTeK Computer Inc., Asus Global Pte. Ltd. and Asus Technology Pte. Limited (collectively, "Defendants" or "ASUS").

INTRODUCTION

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

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

3. LiTL is the legal owner by assignment of the entire right, title, and interest in and to the Asserted Patents, which were duly and legally issued by the United States Patent and 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. On information and belief, Defendant ASUSTek Computer Inc. ("ASUSTeK") is a company organized under the laws of Taiwan, having its principal place of business at No. 15, Li-Te Road, Beitou District, Taipei 112, Taiwan.

6. On information and belief, Defendant Asus Global Pte. Ltd. ("ASGL") is a company organized under the laws of Singapore, having an address at 15A Changi Business Park Central 1, #05-01 Eightrium, Singapore 486035, Singapore. According to ASUSTeK's 2021 annual report, Asus Global is a wholly-owned, direct subsidiary of ASUSTeK. https://www.asus.com/EVENT/Investor/Content/attachment_en/2021_ir_report_en.pdf, p. 163.

7. On information and belief, Defendant Asus Technology Pte. Limited ("ASTP") is a company organized under the laws of Singapore, having an address at 9 Changi Business Park Vista, #07-03/04 Das Spektrum, Singapore 486041, Singapore. According to ASUSTeK's 2021 annual report, Asus Technology is a wholly-owned, indirect subsidiary of ASUSTeK. https://www.asus.com/EVENT/Investor/Content/attachment_en/2021_ir_report_en.pdf, p. 164.

JURISDICTION AND VENUE

8. 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).

9. Defendants are subject to specific jurisdiction in this District under Federal Rule of Civil Procedure 4(k)(1) and the Del. Code. Ann. Tit. 20, § 3104 (the "Delaware Long Arm Statute") due to at least Defendants' substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in this District.

10. Alternatively, Defendants are subject to specific jurisdiction in this District under Federal Rule of Civil Procedure 4(k)(2) at least because Defendants purposefully directed their infringing activities to the United States and Delaware through an established distribution channel.

11. On information and belief, ASUSTeK "is a manufacturer and seller of consumer electronic equipment such as laptop computers." *Photonic Imaging Solutions, Inc. v. ASUSTek Computer Inc.*, No. 1:18-cv-00488, D.I. 13 (Answer), ¶ 2 (D. Del. Jan. 4, 2019).

12. On information and belief, ASUSTeK was involved in researching and developing the Accused Products (defined below).

13. On information and belief, ASUSTeK has sold products to ASTP. *See Graphics Properties Holdings Inc. v. Asus Computer International Inc.*, No. 1:12-cv-00210, D.I. 14, Declaration of Yvette Wang, ¶ 9 (D. Del. May 14, 2012).

14. On information and belief, ASUSTeK sells products to ASGL. According to ASUS's 2021 annual report, ASUSTeK made over 92% of its sales in 2021 to ASGL. https://www.asus.com/EVENT/Investor/Content/attachment_en/2021_ir_report_en.pdf, p. 279.

15. On information and belief, ASTP provides financing to ASGL. https://www.asus.com/EVENT/Investor/Content/attachment_en/2021_ir_report_en.pdf, p. 275.

16. On information and belief, ASGL sells products to ASUS Computer International ("ACI"), a California corporation located in California. According to ASUS's 2021 annual report, ASGL made over 21% of its sales in 2021 to ACI. https://www.asus.com/EVENT/Investor/Content/attachment_en/2021_ir_report_en.pdf, p. 279. On information and belief, in 2022 ASGL shipped ACI over 400 containers containing over 1 million notebook computers. On information and belief, these shipments included the Accused Products.

17. On information and belief, ASTP has sold and shipped products to ACI. *See Graphics Properties Holdings Inc. v. Asus Computer International Inc.*, No. 1:12-cv-00210, D.I. 16, Declaration of Godwin Yan, ¶ 9 (D. Del. May 14, 2012).

18. On information and belief, ASUSTeK has sold and continues to sell the Accused Products to ASGL.

19. On information and belief, ASGL's purchases of the Accused Products have been financed and continue to be financed, at least in part, by ASTP.

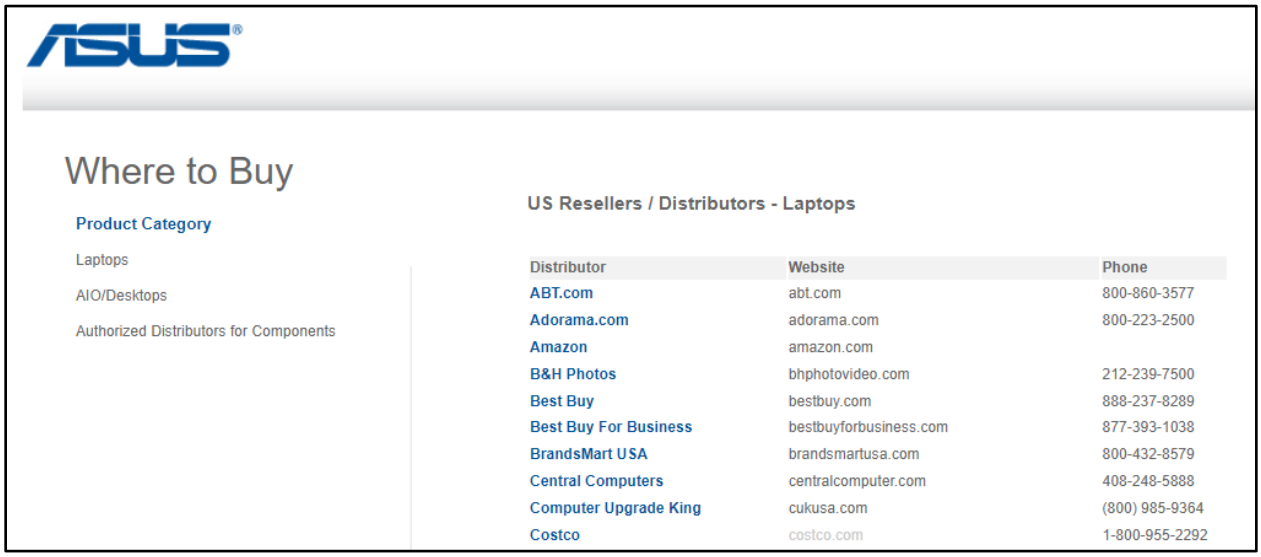
20. On information and belief ASGL has sold and continues to sell the Accused Products to ACI in the United States.

21. According to ASUSTeK's 2021 annual report, revenues from the United States accounted for about 19% (i.e., 101,713,640 / 535,237,735) of ASUSTeK's global revenues in 2021 and about 20% (i.e., 83,838,466 / 412,780,439) in 2020. https://www.asus.com/EVENT/Investor/Content/attachment_en/2021_ir_report_en.pdf, p. 274.

22. The Accused Products are offered for sale and sold to residents of Delaware from ASUSTeK's website. For example, on January 23, 2023, a VivoBook Go 14 Flip was

purchased from ASUSTeK's website (https://www.asus.com/us/laptops/for-home/vivobook/vivobook-go-14-flip-j1400/) by a resident of Delaware.

23. On information and belief, Best Buy and Costco are part of Defendants' established distribution channel. For example:



Where to Buy

Product Category

Laptops

AIO/Desktops

Authorized Distributors for Components

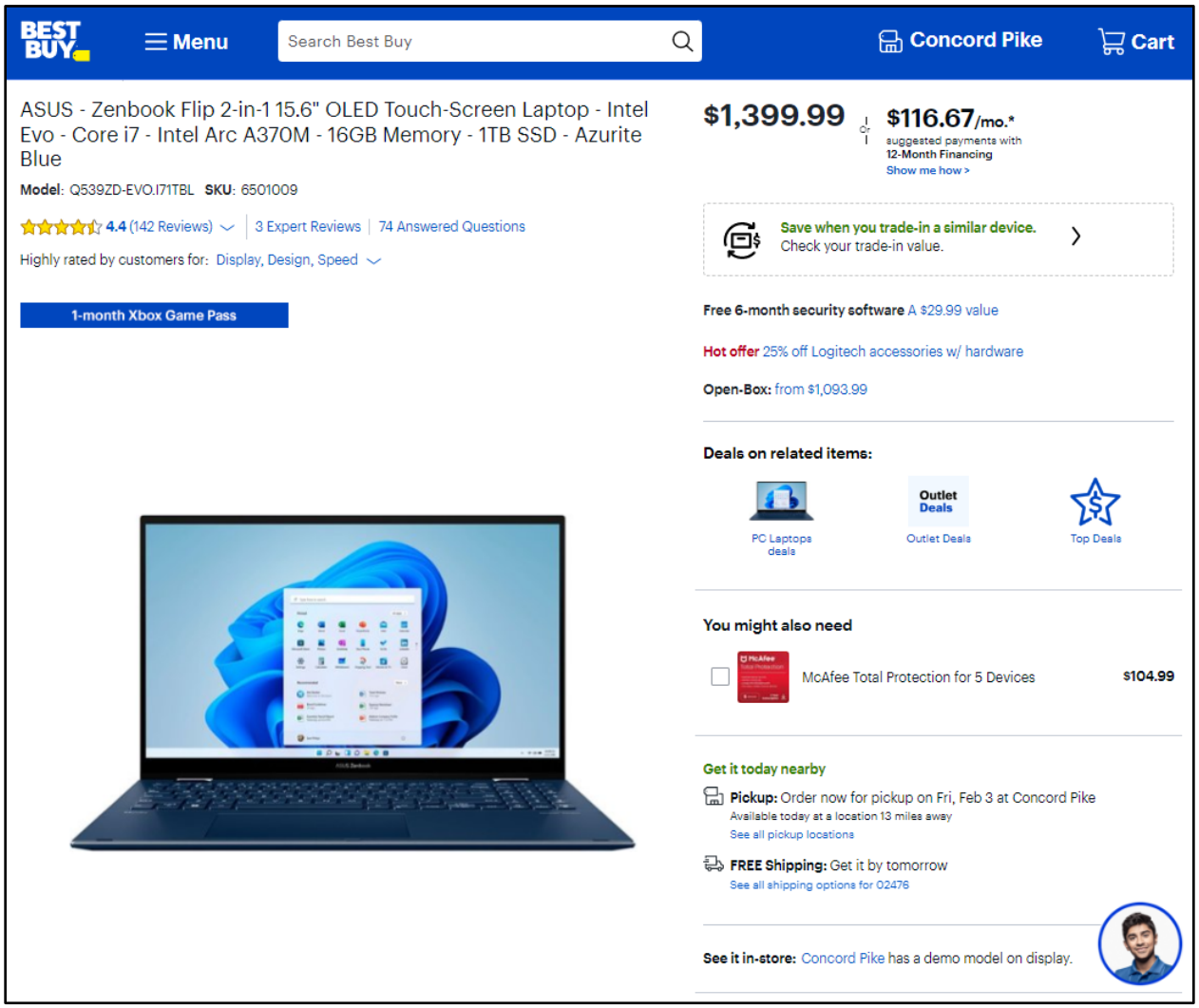
US Resellers / Distributors - Laptops

Distributor	Website	Phone
ABT.com	abt.com	800-860-3577
Adorama.com	adorama.com	800-223-2500
Amazon	amazon.com	
B&H Photos	bhphotovideo.com	212-239-7500
Best Buy	bestbuy.com	888-237-8289
Best Buy For Business	bestbuyforbusiness.com	877-393-1038
BrandsMart USA	brandsmartusa.com	800-432-8579
Central Computers	centralcomputer.com	408-248-5888
Computer Upgrade King	cukusa.com	(800) 985-9364
Costco	costco.com	1-800-955-2292

https://promos.asus.com/US/where_to_buy/index.htm

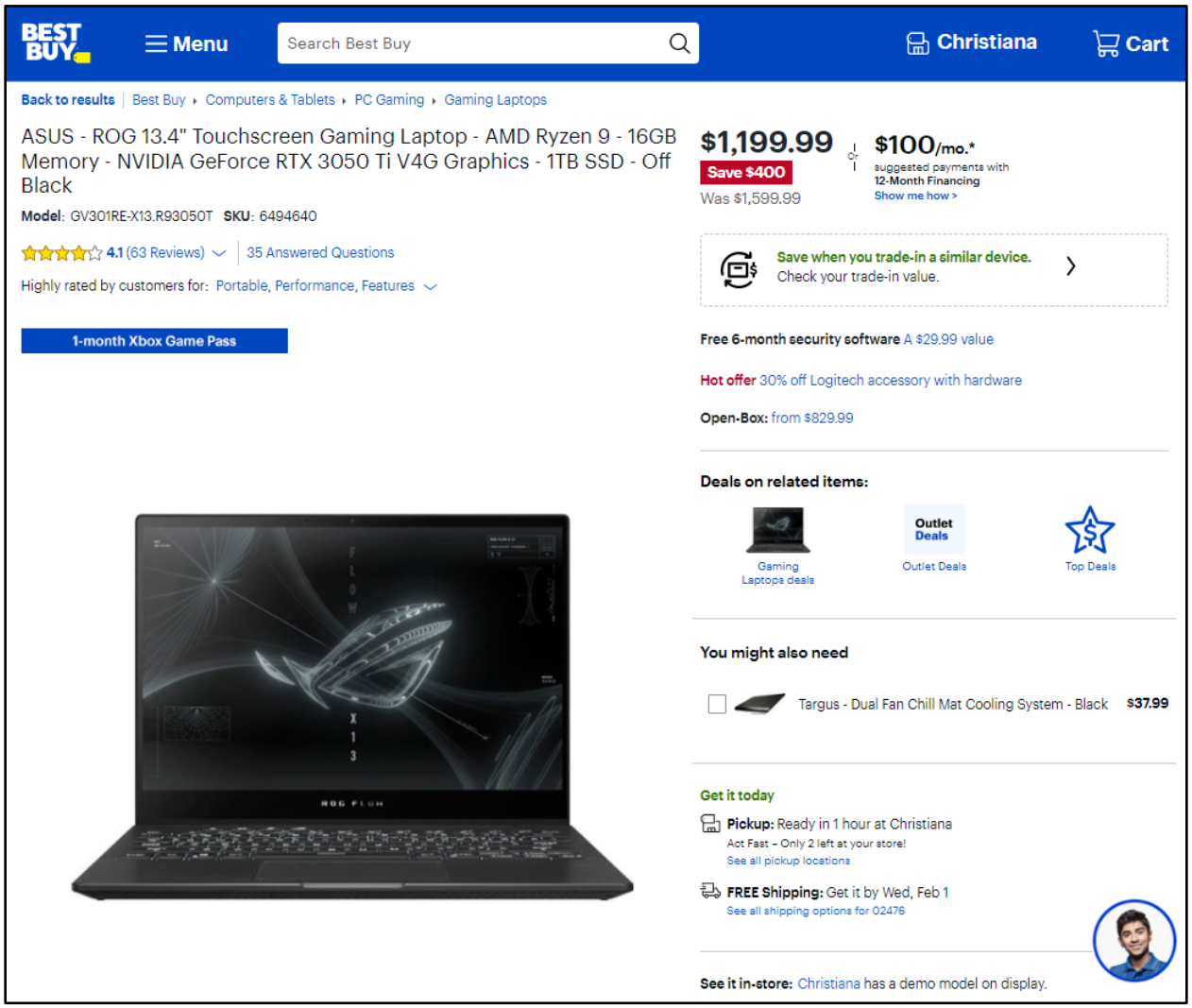
24. On information and belief, the Accused Products are offered for sale and sold to residents of Delaware by Best Buy for pickup at Best Buy stores located in Delaware. For example, on January 23, 2023, a VivoBook Flip 14 was purchased by a resident of Delaware from Best Buy's website (https://www.bestbuy.com/site/asus-vivobook-flip-14-j401ma-14-laptop-intel-pentium-silver-4-gb-memory-128-gb-emmc/6507132.p?skuId=6507132) for pickup at a Best Buy store located at 4807 Concord Pike, Wilmington, Delaware.

25. On January 30, 2023, Best Buy's website offered for sale a convertible Zenbook, an Accused Product, for pickup at Best Buy's "Concord Pike" store, located at 4807 Concord Pike, Wilmington, Delaware.



https://www.bestbuy.com/site/asus-zenbook-flip-2-in-1-15-6-oled-touch-screen-laptop-intel-evo-core-i7-intel-arc-a370m-16gb-memory-1tb-ssd-azurite-blue/6501009.p?skuId=6501009

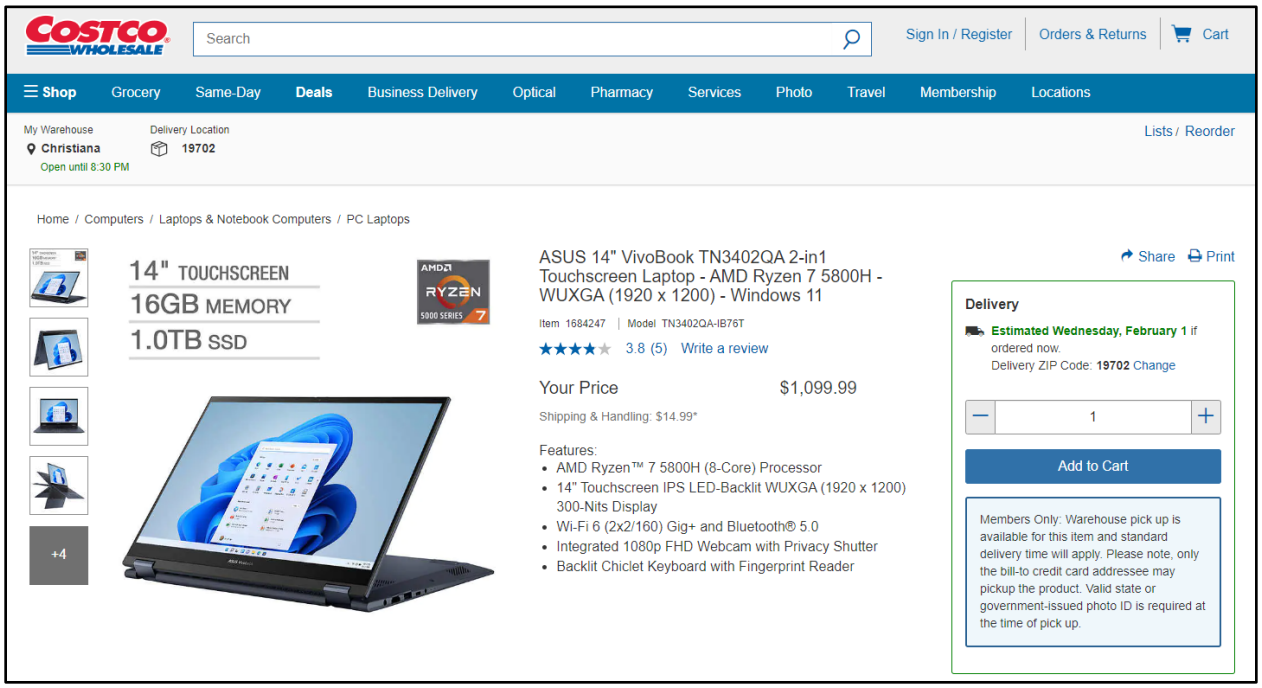
26. On January 30, 2023, Best Buy's website offered for sale a convertible ROG laptop, an Accused Product, for pickup at Best Buy's "Christiana" store, located at 2700 Fashion Center Blvd in Newark, Delaware.



https://www.bestbuy.com/site/asus-rog-13-4-touchscreen-gaming-laptop-amd-ryzen-9-16gb-memory-nvidia-geforce-rtx-3050-ti-v4g-graphics-1tb-ssd-off-black/6494640.p?skuId=6494640

27. On information and belief, the Accused Products are offered for sale to residents of Delaware by Costco for pickup at a Costco store located in Delaware. On January 30, 2023,

Costco's website offered for sale a convertible VivoBook, an Accused Product, for pickup at Costco's "Christiana" store, located at 900 Center Blvd S in Newark, Delaware 19702.



https://www.costco.com/asus-14%22-vivobook-tn3402qa-2-in1-touchscreen-laptop---amd-ryzen-7-5800h----wuxga-(1920-x-1200)---windows-11.product.4000038231.html

28. In *IPA Technologies Inc. v. ASUS Computer International et al*, No. 1:17-cv-00120, D.I. 7 (Answer), ¶ 5 (D. Del. May 2, 2017), ASUSTeK admitted that "it is subject to personal jurisdiction in this District for this particular case only."

29. In *Photonic Imaging Solutions, Inc. v. ASUSTek Computer Inc.*, No. 1:18-cv-00488, D.I. 13 (Answer), ¶ 4 (D. Del. Jan. 4, 2019), ASUSTeK stated that "ASUSTeK does not object to this Court exercising personal jurisdiction over ASUSTeK for the purpose of this case only."

30. On information and belief, ASUSTeK, ASGL and ASTP maintain purposeful contacts with this District and with the United States, including but not limited to: (1) ASUSTeK researches and develops the Accused Products, (2) ASUSTeK makes or has made the Accused

Products; (3) ASUSTeK sells the Accused Products to ASGL with financing from ASTP, and ASGL sells the Accused Products to ACI in the United States; (4) ACI sells the Accused Products to resellers such as Best Buy and Costco, which have locations in Delaware; (5) Defendants put the Accused Products into ASUS's established distribution channel that targets Delaware and the United States; and (6) on information and belief, each of Defendants put the Accused Products into the stream of commerce with the expectation that some of the Accused Products will be purchased by consumers in Delaware and throughout the United States.

31. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Defendants do not reside in the United States and venue lies in any judicial district pursuant to 28 U.S.C. § 1391(c)(3). Upon information and belief, Defendants have transacted business in this District and have committed acts of direct and indirect infringement in this District by, among other things, making, using, offering to sell, selling, and/or importing products that infringe the Asserted Patents.

FACTUAL BACKGROUND

LiTL's Patented Technologies

32. 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.

33. 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/www.litl.com/essays/hardware.htm

34. 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

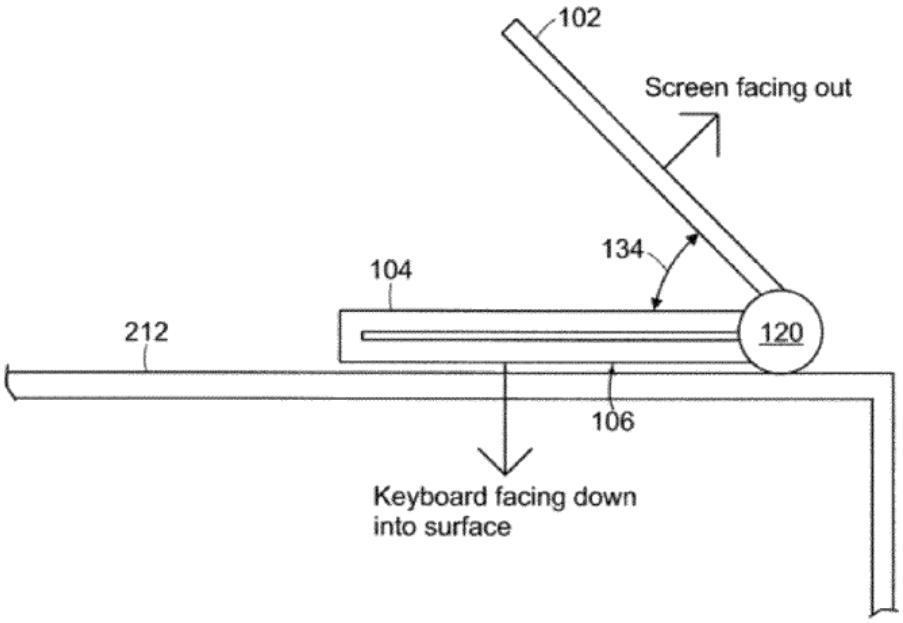
35. Rotating the webbook display into "easel mode" allows users to easily consume content from the Internet via a streamlined, intuitive interface.

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

36. 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.

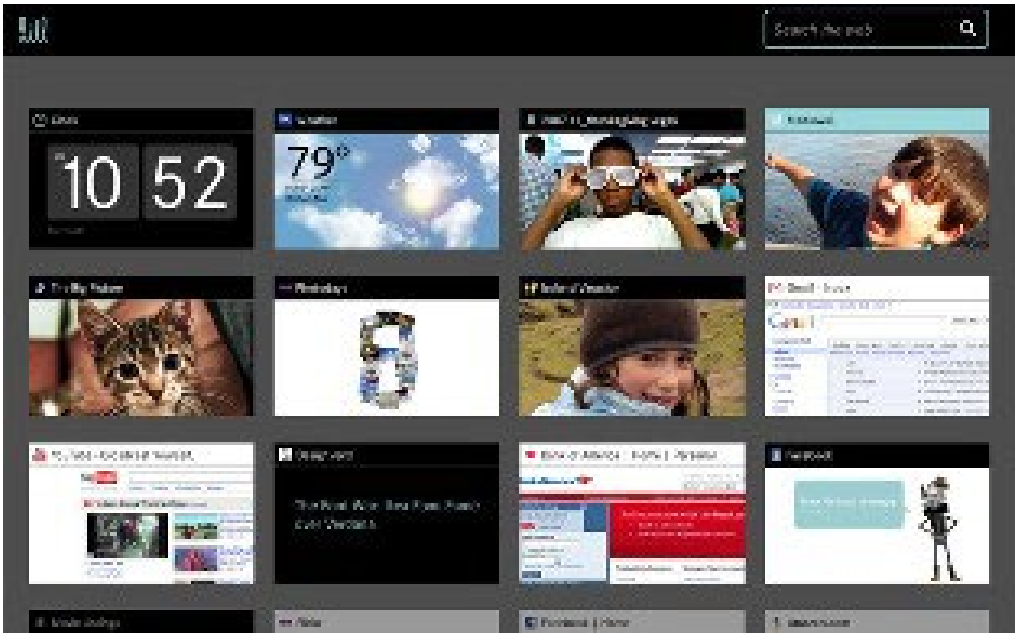
http://web.archive.org/web/20130420102239/http://litl.com/webbook/meet-webbook/more-fun.htm

37. 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.

38. 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

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

LiTL's Asserted Patents

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

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

42. 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.

43. 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.

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

45. 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.

46. 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.

47. 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.

48. 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.

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

50. 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.

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

52. 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 ASUS.

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

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

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

55. 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.

56. The infringing products include, but are not limited to, ZenBook Flip; ZenBook Flip S13; Zenbook Flip 13; Zenbook Flip 14; Zenbook 14 Flip; Zenbook Flip 15; Zenbook Pro Flip 15; Zenbook Pro 15 Flip; VivoBook Flip 12; Vivobook 13 Slate; VivoBook Flip 14; VivoBook S14 Flip; VivoBook Go 14 Flip; VivoBook Flip 15; ExpertBook B3 Flip; ExpertBook B5 Flip; ExpertBook B7 Flip; NovaGo; BR1100F (11.6 inch); Q304UA (13.3 inch); Q325UA (13.3 inch); Q504UA (15.6 inch); Q505UA (15.6 inch); Q524 (15.6 inch); Q525 (15.6 inch);

Q526 (15.6 inch); Q536 (15.6 inch); Transformer Book Flip; ROG Flow X13; and ROG Flow X16 ("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.

57. While each of the Accused Products are convertible models, ASUS also offers at least three product lines which can be sold in a conventional laptop configuration as an alternative to the infringing convertible configuration (*e.g.*, ZenBook, VivoBook, and ExpertBook). ASUS distinguishes conventional laptops from convertible models by labelling the latter with a "Flip" designation in the product name:

- ZenBook: https://press.asus.com/#/news/details?solo=174 (distinguishing the ZenBook 13 (UX325) with the ZenBook **Flip** 13 (UX363) by emphasizing that the latter features "a precision-engineered 360° ErgoLift hinge that allows versatile usage modes: laptop, tablet, tent, stand, or anything in between")
- VivoBook: https://press.asus.com/#/news/details?solo=174 (distinguishing between the VivoBook 14 (K413/X413) and VivoBook **Flip** 14 (TP470) by emphasizing that the latter features a "360° hinge that allows it to be used in laptop, stand, tent and tablet modes — or anything in between")
- ExpertBook: https://press.asus.com/#/news/details?solo=2296 (distinguishing the ExpertBook B5 and the ExpertBook B5 **Flip** by noting that the latter "additionally benefits from a 360° any-position hinge that gives it unrivaled flexibility for all aspects of the working day, from focused productivity to collaborative online meetings, including tablet, tent, stand and traditional modes")

58. On information and belief, the Accused Products are all convertible devices comprising a 360° hinge, which are capable of being used in multiple modes, including laptop mode, tent mode, tablet mode, and stand mode. For example:

- ZenBook Flip (UX360) (April 12, 2016): https://press.asus.com/#/news/details?solo=83
- VivoBook Flip 15 (TP501) (January 5, 2017): https://press.asus.com/#/news/details?solo=98
- Zenbook Flip 14 (UX461) and Zenbook Flip 15 (UX561) (August 30, 2017): https://press.asus.com/#/news/details?solo=114
- NovaGo (TP370) (December 6, 2017): https://press.asus.com/#/news/details?solo=120
- Zenbook Flip 13 (UX362) and Zenbook Flip 15 (UX562) (August 30, 2018): https://press.asus.com/#/news/details?solo=139
- Zenbook Flip S13 (UX371), Zenbook Flip 13 (UX363), Zenbook Flip 15 (UX564), and VivoBook Flip 14 (TP470) (September 3, 2020): https://press.asus.com/#/news/details?solo=174
- BR1100F (11.6 inch) (January 14, 2021): https://press.asus.com/#/news/details?solo=175
- Vivobook 13 Slate (T3300) (November 3, 2021): https://press.asus.com/#/news/details?solo=182
- VivoBook Go 14 Flip (TP400) (November 23, 2021): https://press.asus.com/#/mediaResources/videos/details?index=9

- Zenbook Pro Flip 15 (UP6502) (May 10, 2022): https://press.asus.com/#/news/details?solo=198
- VivoBook S14 Flip (TP3402) (July 7, 2022): https://press.asus.com/#/mediaResources/videos/details?index=121
- ROG Flow X13 (GV301) and ROG Flow X16 (GV601) (January 3, 2023): https://press.asus.com/#/news/details?solo=3341

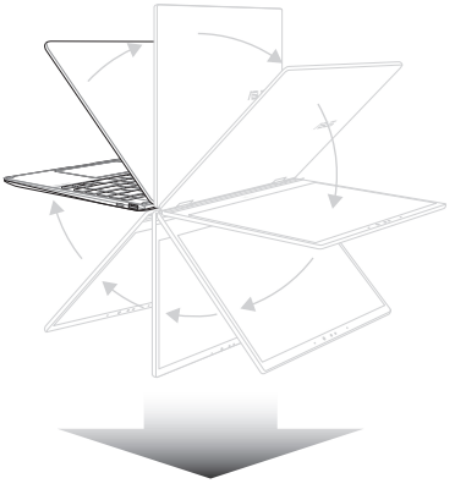
59. Defendants make, use, sell, offer for sale and import the Zenbook Flip 13 (UX363) and the device's features are described on ASUS's website and other platforms in various places, including but not limited to:

- https://www.asus.com/us/laptops/for-home/zenbook/zenbook-flip-13-oled-ux363-11th-gen-intel/ ("Zenbook Flip 13 (UX363) Webpage")
- https://www.asus.com/us/laptops/for-home/zenbook/zenbook-flip-13-oled-ux363-11th-gen-intel/techspec/ ("Zenbook Flip 13 (UX363) Specifications")
- https://dlcdnets.asus.com/pub/ASUS/nb/Customer_self_repair_guide/UX363EA/ ("Zenbook Flip 13 (UX363) Maintenance and Service Guide")
- https://dlcdnets.asus.com/pub/ASUS/nb/UX363EA/ ("Zenbook Flip 13 (UX363) User Manual")
- https://www.youtube.com/watch?v=9W7FWNjMc3w&t=20s ("Zenbook Flip 13 (UX363) Video")

60. The product overview and user manual for the Zenbook Flip 13 (UX363) describe at least four operating modes. For example, the webpage explains that "[t]he 360° ErgoLift hinge…offers the versatility to work or relax using…laptop, tent, stand or tablet [mode]." *See* Zenbook Flip 13 (UX363) Webpage.

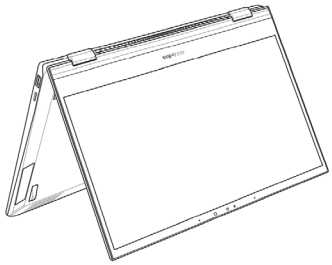
Rotating the display panel

Your Notebook PC's display panel is adjustable up to 360 degrees. You may adjust the display panel as shown below.

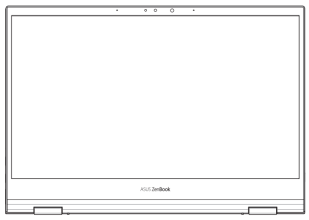


360 degrees adjustable

Stand mode



Tent mode



Tablet mode

Notebook PC mode

See, e.g., Zenbook Flip 13 (UX363) User Manual, pp. 46-47.

61. The keyboard and touchpad are automatically disabled in three of the four operating modes.

> **NOTE:** Rotating the screen to Stand, Tent and Tablet mode will disable the keyboard and touchpad.

See, e.g., Zenbook Flip 13 (UX363) User Manual, p. 47.

62. 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:

ZenBook Flip (UX360)	https://www.asus.com/laptops/for-home/zenbook/zenbook-flip-ux360/techspec/
ZenBook Flip S13 (UX371)	https://www.asus.com/us/laptops/for-home/zenbook/zenbook-flip-s13-oled-ux371-11th-gen-intel/techspec/
Zenbook Flip 13 (UX362)	https://www.asus.com/laptops/for-home/zenbook/zenbook-flip-13-ux362/techspec/
Zenbook Flip 13 (BX363)	https://dlcdnets.asus.com/pub/ASUS/nb/UX363EA/E17848_UX363EA_EM_V3_WEB.pdf?model=bx363ea
Zenbook Flip 13 (UX363)	https://www.asus.com/us/laptops/for-home/zenbook/zenbook-flip-13-oled-ux363-11th-gen-intel/techspec/
Zenbook Flip 14 (UX461)	https://www.asus.com/us/laptops/for-home/zenbook/asus-zenbook-flip-14-ux461/techspec/
Zenbook Flip 14 (UX463)	https://www.asus.com/laptops/for-home/zenbook/zenbook-flip-14-ux463/techspec/
Zenbook 14 Flip (UP5401)	https://www.asus.com/laptops/for-home/zenbook/zenbook-14-flip-oled-up5401-11th-gen-intel/techspec/
Zenbook 14 Flip (UM462)	https://www.asus.com/laptops/for-home/zenbook/zenbook-flip-14-um462/techspec/
Zenbook Flip 15 (Q538)	https://www.asus.com/us/laptops/for-home/zenbook/zenbook-flip-15-q538ei/techspec/
Zenbook Flip 15 (UM562)	https://www.asus.com/laptops/for-home/zenbook/zenbook-flip-15-um562/techspec/
Zenbook Flip 15 (UX561)	https://www.asus.com/laptops/for-home/zenbook/zenbook-flip-ux561/techspec/
Zenbook Flip 15 (UX562)	https://www.asus.com/laptops/for-home/zenbook/zenbook-flip-15-ux562/techspec/

Zenbook Flip 15 (UX563)	https://www.asus.com/laptops/for-home/zenbook/zenbook-flip-15-ux563/techspec/
Zenbook Flip 15 (UX564)	https://www.asus.com/laptops/for-home/zenbook/zenbook-flip-15-ux564/techspec/
Zenbook Pro 15 Flip (Q528)	https://www.asus.com/us/laptops/for-home/zenbook/q528eh/techspec/
VivoBook Flip 12 (TP202)	https://www.asus.com/us/laptops/for-home/vivobook/asus-vivobook-flip-12-tp202/techspec/
VivoBook Flip 12 (TP203)	https://www.asus.com/laptops/for-home/vivobook/vivobook-flip-12-tp203/techspec/
VivoBook Flip 14 (TP401)	https://www.asus.com/laptops/for-home/vivobook/vivobook-flip-14-tp401/techspec/
VivoBook Flip 14 (TP410)	https://www.asus.com/laptops/for-home/vivobook/vivobook-flip-14-tp410/techspec/
VivoBook Flip 14 (TP412)	https://www.asus.com/us/laptops/for-home/vivobook/asus-vivobook-flip-14-tp412/techspec/
VivoBook Flip 14 (TM420)	https://www.asus.com/us/laptops/for-home/vivobook/vivobook-flip-14-tm420/
VivoBook Flip 14 (TP470)	https://www.asus.com/us/laptops/for-home/vivobook/vivobook-flip-14-tp470/techspec/
VivoBook Flip 15 (TP501)	https://www.asus.com/laptops/for-home/vivobook/vivobook-flip-15-tp501/techspec/
ExpertBook B3 Flip (B3402)	https://www.asus.com/laptops/for-work/expertbook/expertbook-b3-flip-b3402
ExpertBook B5 Flip (B5302)	https://www.asus.com/laptops/for-work/expertbook/expertbook-b5-flip-b5302
ExpertBook B7 Flip (B7402)	https://www.asus.com/laptops/for-work/expertbook/expertbook-b7-flip-b7402
NovaGo (TP370)	https://dlcdnets.asus.com/pub/ASUS/GamingNB/TP370QL/0409_E14198_TP370QL_V4_A.pdf?model=TP370QL
BR1100F (11.6 inch)	https://www.asus.com/us/laptops/for-students/all-series/asus-br1100f/
Q304UA (13.3 inch)	https://dlcdnets.asus.com/pub/ASUS/nb/Q304UA/0409_E11208_Q304UA_A.pdf?model=q304ua
Q325UA (13.3 inch)	https://dlcdnets.asus.com/pub/ASUS/nb/UX370UA/0409_E12160_UX370_C.pdf?model=q325ua

Q504UA (15.6 inch)	https://dlcdnets.asus.com/pub/ASUS/nb/UX560UA/0409_E11237_UX560UA_Q504UA_A.pdf?model=q504ua
Q505UA (15.6 inch)	https://dlcdnets.asus.com/pub/ASUS/nb/UX561UAR/0409_E12529_UX561UA_UN_Q505_525_D.pdf?model=q505ua
Q524 (15.6 inch)	https://dlcdnets.asus.com/pub/ASUS/nb/UX560UA/0409_E11237_UX560UA_Q504UA_A.pdf?model=q524uq
Q525 (15.6 inch)	https://dlcdnets.asus.com/pub/ASUS/nb/UX560UA/0409_E11237_UX560UA_Q504UA_A.pdf?model=q524uq
Q526 (15.6 inch)	https://dlcdnets.asus.com/pub/ASUS/nb/UX392FN/0409_E14852_UX562FA_A.pdf?model=q526fa
Q536 (15.6 inch)	https://dlcdnets.asus.com/pub/ASUS/nb/UX562FD/0409_E14205_UX562FD_FN_D.pdf?model=Q536FD
Transformer Book Flip (TP200)	https://www.asus.com/ca-en/site/2-in-1/asus-transformer-book-flip/
Transformer Book Flip (TP500)	https://www.asus.com/ca-en/site/2-in-1/asus-transformer-book-flip/
Transformer Book Flip (TP550)	https://www.asus.com/ca-en/site/2-in-1/asus-transformer-book-flip/
ROG Flow X13 (GV301)	https://rog.asus.com/us/laptops/rog-flow/2021-rog-flow-x13-series/

63. 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 ASUS personnel, agents, customers or resellers 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.

64. ASUS 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 ASUS's infringement of the Asserted Patents, find this case exceptional and

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

COUNT I

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

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

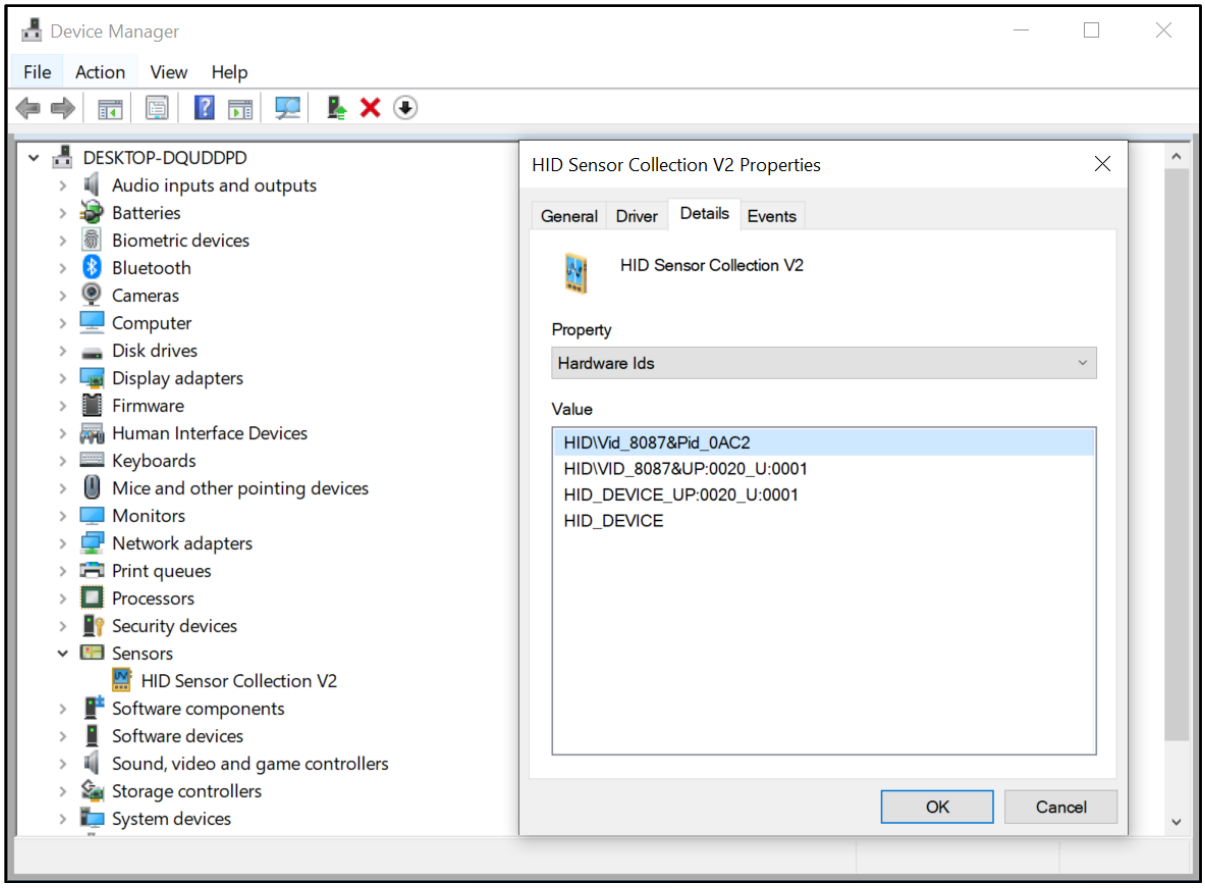
ASGL's Direct Infringement

66. ASGL 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 selling and offering for sale in the United States the Accused Products.

67. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:

68. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:



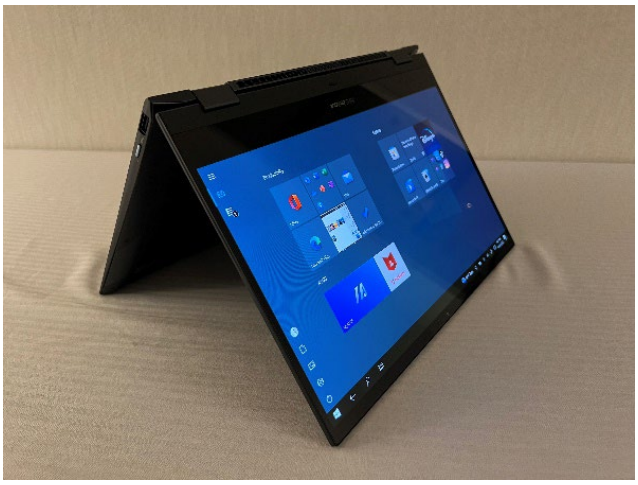
Screenshot from Zenbook Flip 13 (UX363), Device Manager

First content display orientation in laptop mode

Second content display orientation in easel mode

69. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

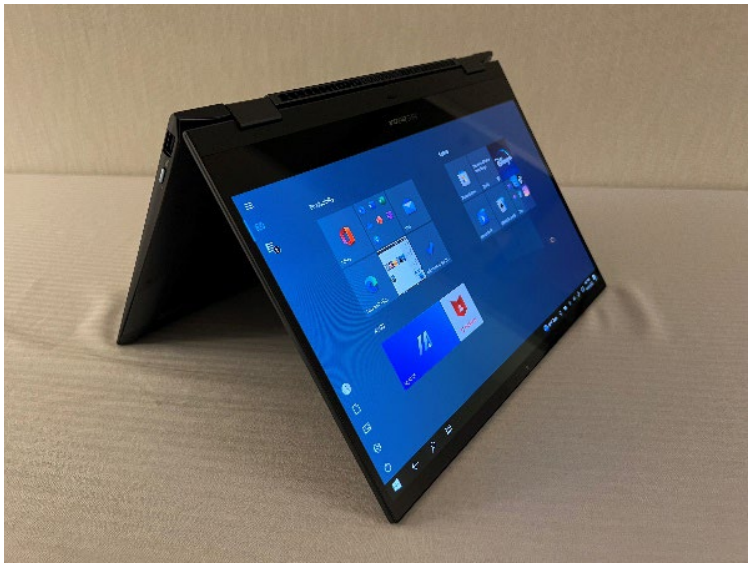
70. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a display orientation module further configured to trigger a display inversion from one of the first and second content display orientations to the other of the first and second content display orientations responsive to the orientation 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

71. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

Induced Infringement by ASGL and ASTP

72. Since at least the filing of this Complaint, ASGL and ASTP know of the ’688 patent and know that the Accused Products infringe at least claim 19 of the ’688 patent when sold or offered for sale by ASGL to ACI, when imported into the United States, when sold or

offered for sale by ACI or by resellers such as Best Buy and Costco, and when used by customers or other users.

73. Since at least the filing of this Complaint, ASGL induces infringement of the ’688 patent by actively encouraging resellers to directly infringe at least claim 19 of the ’688 patent by selling the Accused Products to ACI, knowing that ACI sells the Accused Products to resellers such as Best Buy and Costco.

74. Since at least the filing of this Complaint, ASTP induces infringement of the ’688 patent by actively encouraging resellers to directly infringe at least claim 19 of the ’688 patent by financing ASGL’s purchase of the Accused Products.

ASUSTeK’s Knowledge of the ’688 Patent

75. 70. On information and belief, ASUSTeK has known of the ’688 patent since at least about June 2013.

76. The ’688 patent and its published application were cited during prosecution of at least two U.S. patent applications owned by ASUSTeK.

<u>The ASUSTeK ’969 Application</u>

77. For example, on June 8, 2009, ASUSTeK filed U.S. Patent No. 12/479,969 (“the ASUSTeK ’969 Application”), entitled “Portable Computer.”

78. On October 1, 2010, the USPTO issued an office action rejecting claim 6 as obvious over, inter alia, U.S. Pub. No. 2009/0244832 (“Behar”), which is the publication of the application that issued as the ’688 patent.

79. In a response dated December 30, 2010, when attempting to distinguish the prior art, ASUSTeK provided a detailed description of the multi-mode convertible computing device disclosed in Behar: “Behar discloses that a portable computer that is configurable between a plurality of display modes including a laptop mode (in which the portable computer has a

conventional appearance) and an easel mode in which the base of the computer and its display component stand vertically forming an inverted 'V'."

80. On June 28, 2011, the ASUSTeK '969 Application issued as U.S. Patent No. 7,969,721, identifies Behar on the face of the patent under the "References Cited" section, and uses an asterisk to indicate that Behar was cited by the examiner.

(56) **References Cited**

U.S. PATENT DOCUMENTS

6,930,669	B2	8/2005	Weiner et al.	
7,126,816	B2	10/2006	Krah	
7,486,279	B2 *	2/2009	Wong et al.	345/173
2004/0105226	A1 *	6/2004	Geeng	361/683
2006/0279652	A1 *	12/2006	Yang et al.	348/333.01
2009/0189991	A1 *	7/2009	Lee	348/222.1
2009/0244832	A1 *	10/2009	Behar et al.	361/679.55

FOREIGN PATENT DOCUMENTS

CN	1831794	9/2006

OTHER PUBLICATIONS

English language translation of abstract of CN 1831794.

* cited by examiner

The ASUSTeK '773 Application

81. As another example, on October 18, 2011, ASUSTeK filed U.S. Patent Application No. 13,275,773 ("the ASUSTeK '773 Application"), entitled "Tablet Electronic Device."

82. ASUSTeK filed a Power of Attorney ("POA") signed by Tsung Tan Shih, who is identified as ASUSTeK's Chief Executive Officer.

SIGNATURE of Assignee of Record
The individual whose signature and title is supplied below is authorized to act on behalf of the assignee

Signature	Shih, Tsung-Tang	Date	September 12,2008
Name	Shih, Tsung Tang	Telephone	
Title	Chief Executive Officer		

83. On June 10, 2013, the USPTO issued an office action rejecting ASUSTeK's pending claims. In the accompanying Notice of References cited, the examiner cited the '688 patent.

84. On September 2, 2014, the ASUSTeK '773 Application issued as U.S. Patent No. 8,824,134, identifies Behar on the face of the patent under the "References Cited" section, and uses an asterisk to indicate that Behar was cited by the examiner.

85. According to ASUSTeK's 2021 Annual Report, ASUSTeK's patent applications "are managed by dedicated personnel to ensure the quality of the patent application. Comprehensive management is built through the system to protect the Company's important intellectual property and avoid infringement by others." https://www.asus.com/EVENT/Investor/Content/attachment_en/2021_ir_report_en.pdf ("ASUSTeK 2021 Annual Report"), pp. 160-161.

86. ASUSTeK claims that it reviews and adjusts its intellectual property management policies "to ensure that the management plans can keep up with the ever-changing business environment, meet the Company's needs and reduce legal risks. The Company regularly reports the implementation status of intellectual property management to the board of directors. The most recent report was November 10, 2021." ASUSTeK 2021 Annual Report, p. 161.

87. 89. On information and belief, ASUSTeK has known of the subject matter of the '688 patent since at least about December 2010 when its patent attorney described the '688 patent's laptop mode and easel mode in an attempt to distinguish Behar. ASUSTeK has known of the '688 patent's existence since about June 2013 when the USPTO cited the '688 patent during prosecution of ASUSTeK's own patent application.

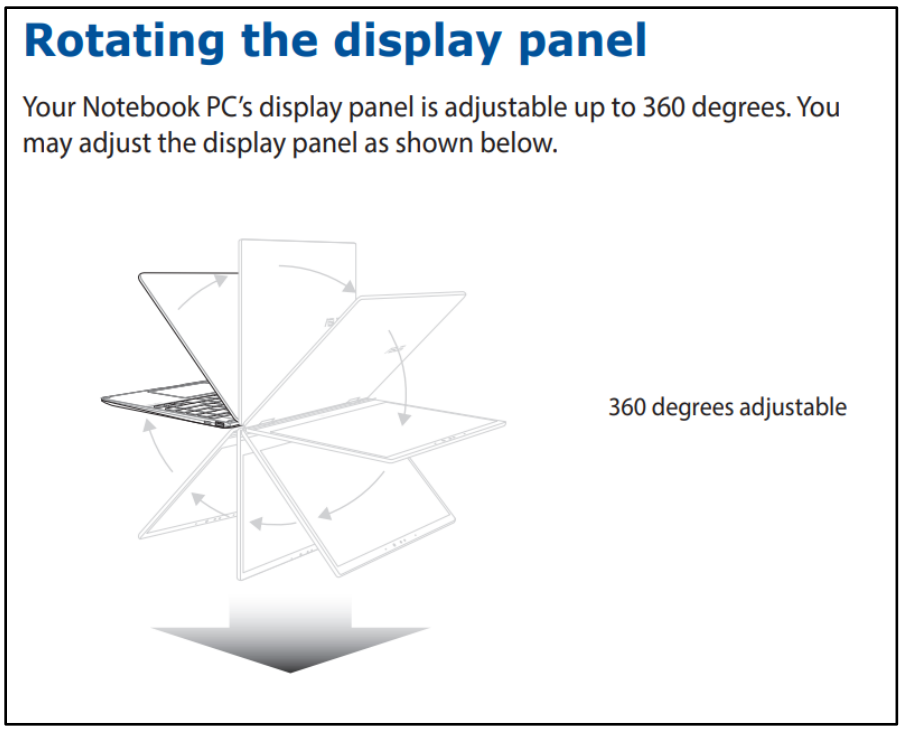
ASUSTeK's Induced Infringement

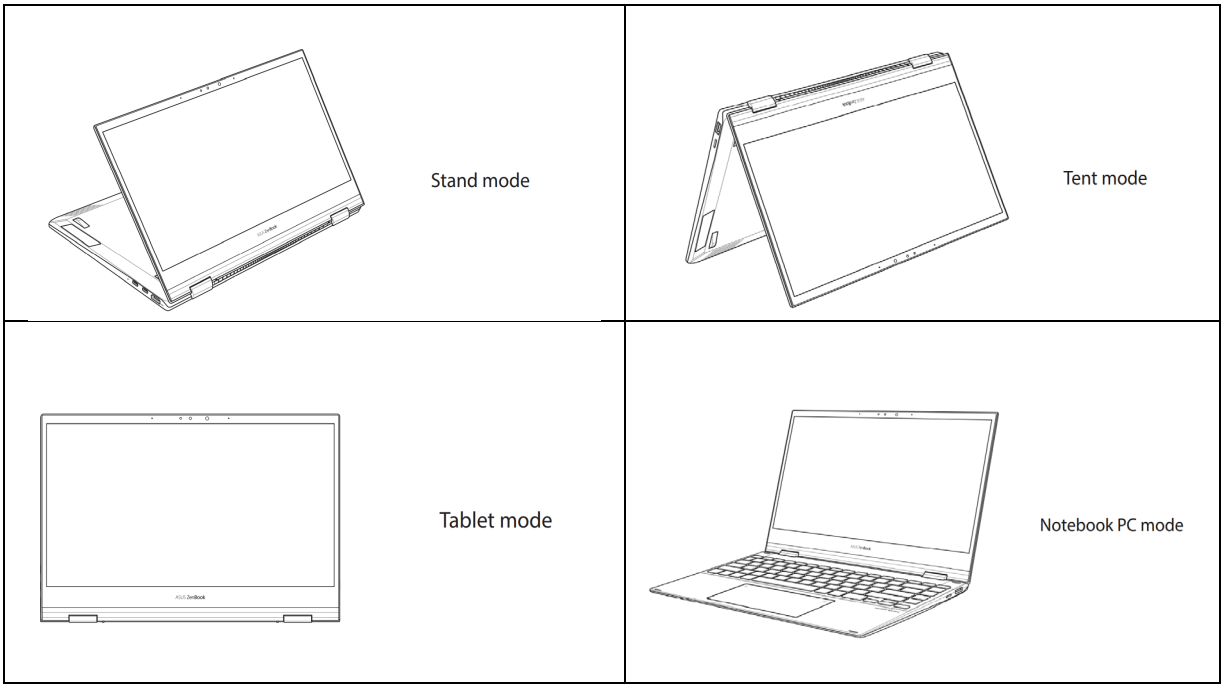
88. On information and belief, ASUSTeK has known that the Accused Products infringe the '688 patent since at least 2017, by which time the Accused Products were being offered for sale, sold, imported, and used in the United States. *See*, *e.g.*, https://press.asus.com/#/news/details?solo=98.

89. Since at least 2017, ASUSTeK knew that the Accused Products infringe at least claim 19 of the '688 patent when used by customers or other users, when sold by ASGL to ACI in the United States, when imported into the United States, and when sold or offered for sale by ACI or by resellers such as Best Buy and Costco.

90. Since at least 2017, ASUSTeK has induced infringement and continues to induce infringement of the '688 patent by actively encouraging ACI and resellers such Best Buy and Costco to directly infringe at least claim 19 of the '688 patent by developing the Accused Products, introducing the Accused Products into an established distribution channel, and actively encouraging downstream sales and offers for sale of the Accused Products.

91. Since at least 2017, ASUSTeK has induced infringement and continues to induce infringement of the '688 patent by actively encouraging customers or other users to directly infringe at least claim 19 of the '688 patent. ASUSTeK's website, https://www.asus.com/us/, provides 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, ASUSTeK's press release announcing the VivoBook Flip (TP501) touts its "360°-flippable 15.6-inch up to Full HD (1920 x 1080) touchscreen that allows users to flip seamlessly and instantly between laptop, tablet, and other modes." https://press.asus.com/#/news/details?solo=98. As another example, the Zenbook Flip 13 (UX363) user manual available on ASUSTeK's website touts the device's four usage modes:





See, e.g., Zenbook Flip 13 (UX363) User Manual, pp. 46-47.

ASUSTeK's Willful Infringement

92. ASUSTeK has willfully infringed at least claim 19 of the '688 patent. ASUSTeK's offers for sale, sales, and promotion of the Accused Products with provision of

manuals and instruction to purchasers that encourage use that ASUSTeK knew would infringe the ’688 patent demonstrates the willful nature of ASUSTeK’s infringement.

93. According to ASUSTeK’s 2021 annual report, ASUSTeK had obtained 5,255 patents in countries around the world by the end of 2021. https://www.asus.com/EVENT/Investor/Content/attachment_en/2021_ir_report_en.pdf (“ASUSTeK 2021 Annual Report”), page 161.

94. As indicated by statements in its most recent annual report, ASUSTeK has intellectual property management procedures to evaluate whether ASUS products have freedom to operate. ASUSTeK 2021 Annual Report, pp. 160-161. Given these procedures, and given ASUSTeK’s knowledge of the ’688 patent, if ASUSTeK did not investigate whether the Accused Products infringe the ’688 patent, then ASUSTeK was willfully blind to a reasonable likelihood that the Accused Products infringe the ’688 patent.

95. The foregoing description of ASUS’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.

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

97. ASUS’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)

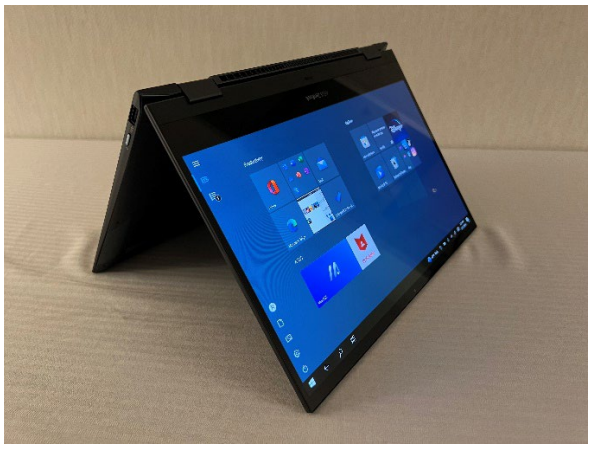
98. LiTL incorporates by reference and realleges all the foregoing paragraphs of this Complaint as if fully set forth herein.

ASGL's Direct Infringement

99. ASGL 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 selling and offering for sale in the United States the Accused Products.

100. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

101. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:

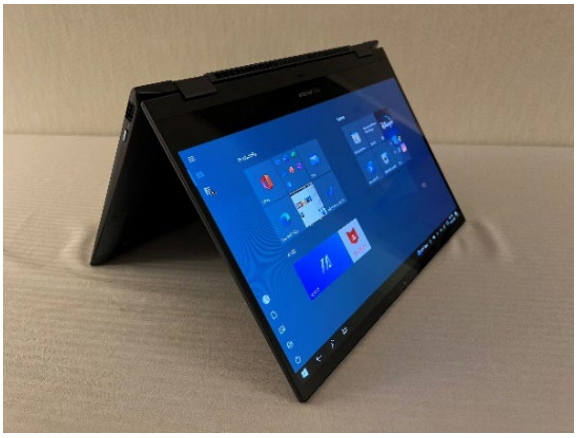
102. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a hinge assembly disposed at least partially within the base. For example:

See, e.g., Zenbook Flip 13 (UX363) Webpage.

103. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

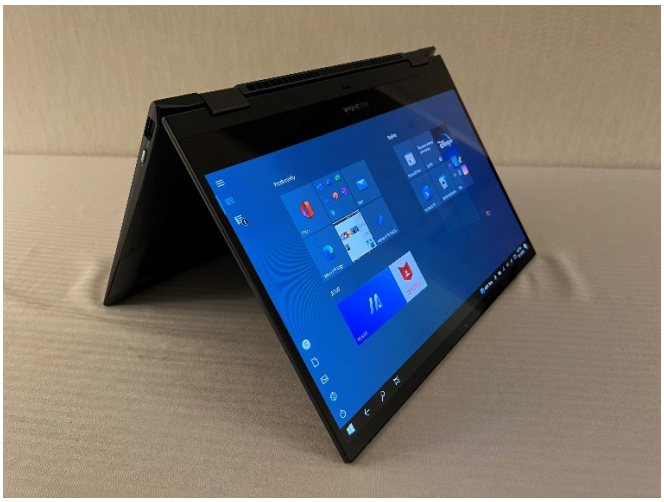


Easel mode

104. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

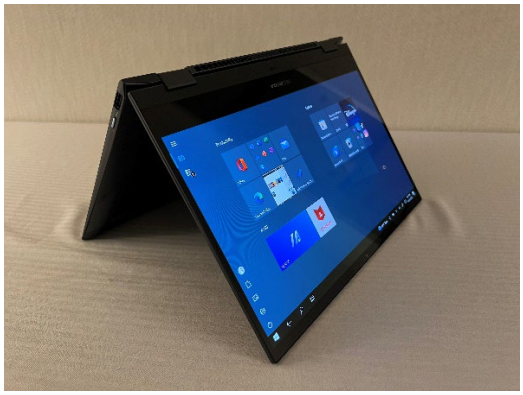
105. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include an easel mode that is configured to display to the user on the main display component a second content mode having a second content display orientation with the main display component oriented towards the user and the keyboard oriented away from the user. For example:



Easel mode configured to display a second content mode

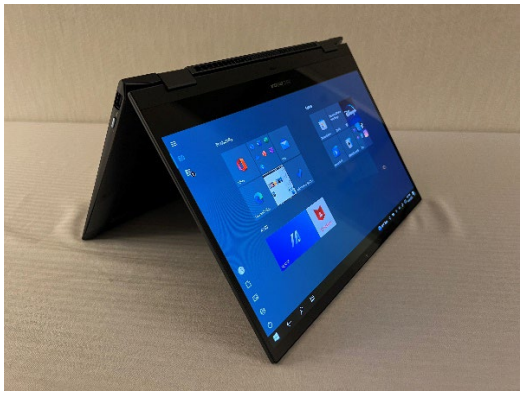
106. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include first and second content display orientations that are 180 degrees relative to each other. For example:

Laptop mode displaying first content display orientation



Easel mode displaying second content display orientation

107. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

108. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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 Zenbook Flip 13 (UX363) includes a touchscreen that is accessible in any mode.

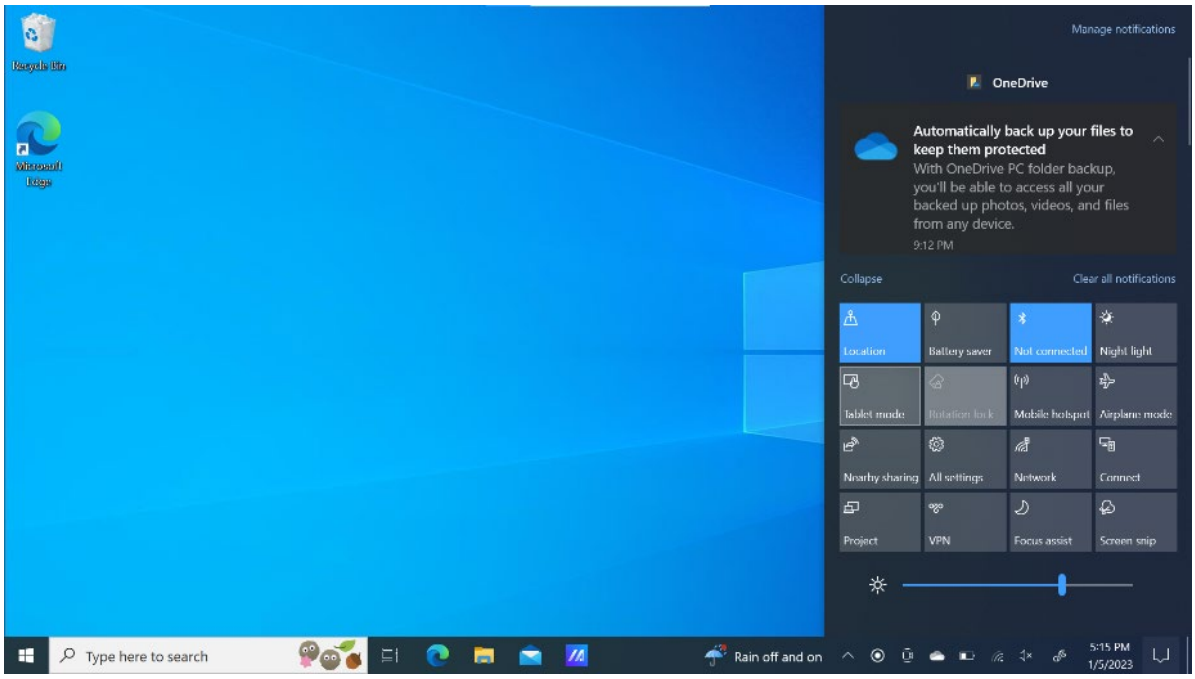
Display	13.3-inch, FHD (1920 x 1080) OLED 16:9 aspect ratio, 0.2ms response time, 60Hz refresh rate, 550nits peak brightness, 100% DCI-P3 color gamut, 1,000,000:1, VESA CERTIFIED Display HDR True Black 500, 1.07 billion colors, PANTONE Validated, Glossy display, 70% less harmful blue light, SGS Eye Care Display, Touch screen, (Screen-to-body ratio)80%, With stylus support

See, e.g., Zenbook Flip 13 (UX363) Specifications.

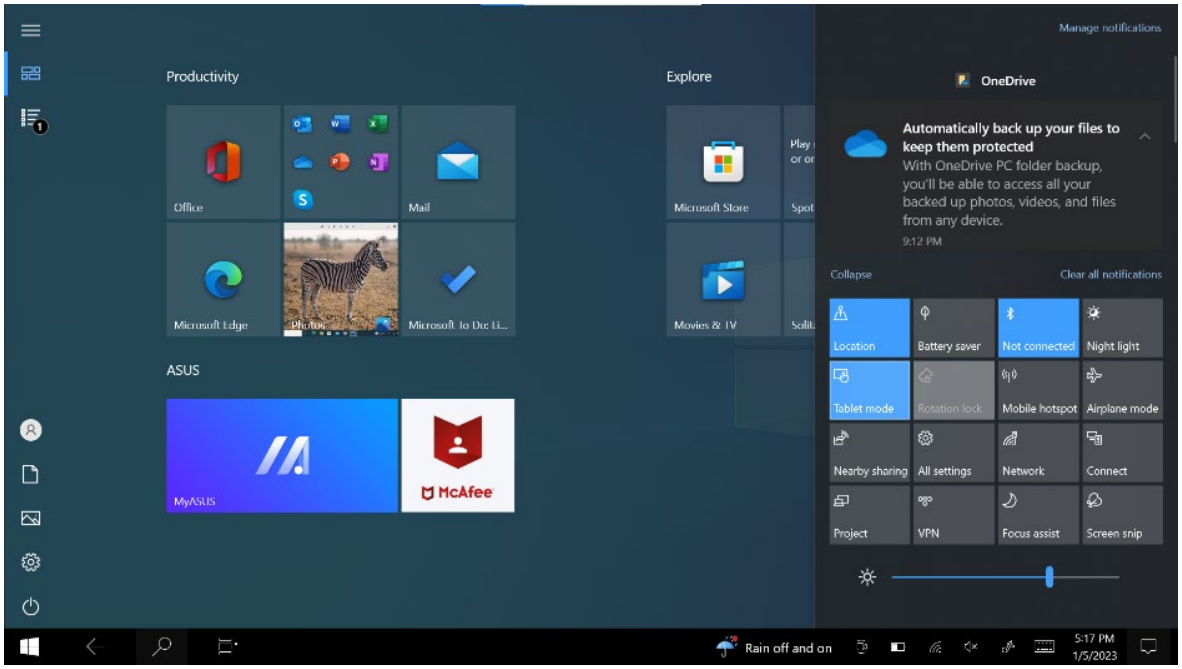
109. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a plurality of modes that includes a frame mode in which the main display component is oriented towards the operator, the base contacts a substantially horizontal surface, and the keyboard faces the substantially horizontal surface.

Frame mode

110. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

Induced Infringement by ASGL and ASTP

111. Since at least the filing of this Complaint, ASGL and ASTP know of the '844 patent and know that the Accused Products infringe at least claims 10 and 17 of the '844 patent when sold or offered for sale by ASGL to ACI, when imported into the United States, when sold or offered for sale ACI or by resellers such as Best Buy and Costco, and when used by customers or other users.

112. Since at least the filing of this Complaint, ASGL induces infringement of the '844 patent by actively encouraging resellers to directly infringe at least claims 10 and 17 of the '844 patent by selling the Accused Products to ACI, knowing that ACI sells the Accused Products to resellers such as Best Buy and Costco.

113. Since at least the filing of this Complaint, ASTP induces infringement of the '844 patent by actively encouraging resellers to directly infringe at least claims 10 and 17 of the '844 patent by financing ASGL's purchase of the Accused Products.

ASUSTeK's Knowledge of the '844 Patent

114. Since at least the filing of this Complaint, ASUSTeK knows of the '844 patent.

115. According to ASUSTeK's 2021 Annual Report, ASUSTeK's patent applications "are managed by dedicated personnel to ensure the quality of the patent application. Comprehensive management is built through the system to protect the Company's important intellectual property and avoid infringement by others." ASUSTeK 2021 Annual Report, pp. 160-161.

116. Given that ASUSTeK personnel are "dedicated" to "comprehensive management" of its patent applications, and given that by 2013 ASUSTeK had become aware of the '688 patent through ASUSTeK's prosecution of its own patent applications, on information

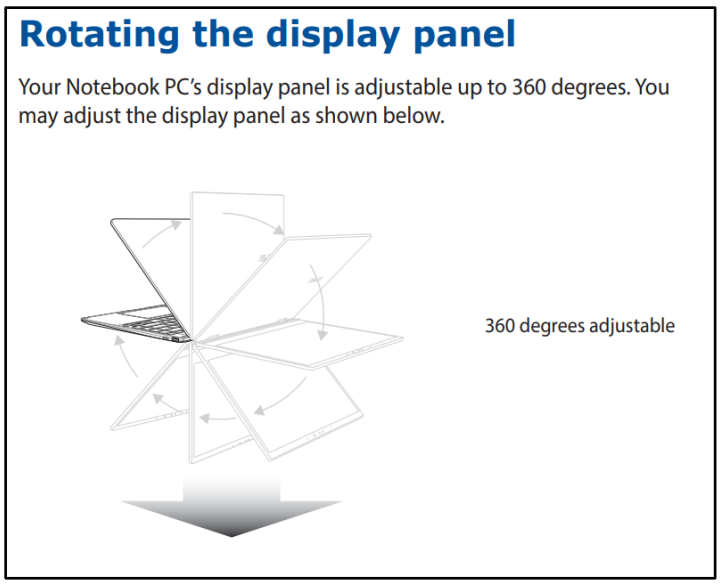
and belief ASUSTeK would have investigated, become aware of, and considered LiTL's patents that relate to the '688 patent, including the '844 patent, before the filing of this Complaint.

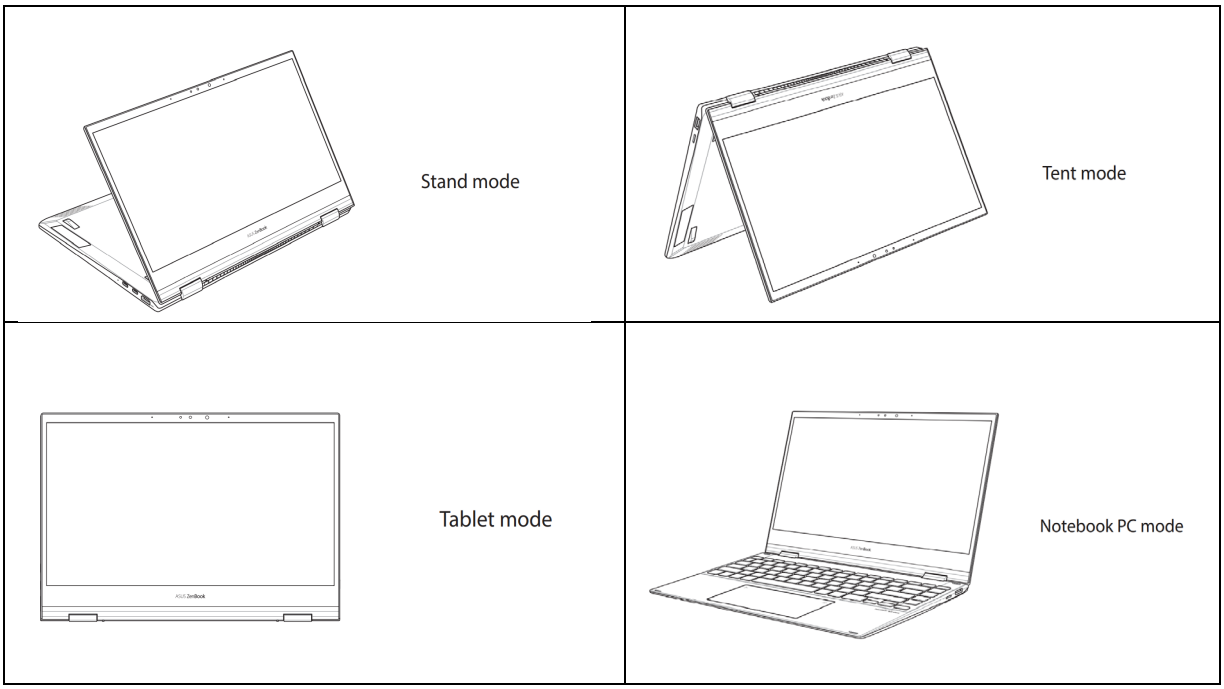
ASUSTeK's Induced Infringement

117. Since at least the filing of this Complaint, ASUSTeK knows that the Accused Products infringe at least claims 10 and 17 of the '844 patent when used by customers or other users, when sold by ASGL to ACI in the United States, when imported into the United States, and when sold or offered for sale by ACI or by resellers such as Best Buy and Costco.

118. Since at least the filing of this Complaint, ASUSTeK induces infringement of the '844 patent by actively encouraging ACI and resellers such Best Buy and Costco to directly infringe at least claims 10 and 17 of the '844 patent by developing the Accused Products, introducing the Accused Products into an established distribution channel, and actively encouraging downstream sales and offers for sale of the Accused Products.

119. Since at least the filing of this Complaint, ASUSTeK induces infringement of the '844 patent by actively encouraging customers or other users to directly infringe at least claims 10 and 17 of the '844 patent. ASUSTeK's website, https://www.asus.com/us/, provides 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. ASUSTeK's press release announcing the VivoBook Flip (TP501) touts its "360°-flippable 15.6-inch up to Full HD (1920 x 1080) touchscreen that allows users to flip seamlessly and instantly between laptop, tablet, and other modes." https://press.asus.com/#/news/details?solo=98. As another example, the Zenbook Flip 13 (UX363) user manual available on ASUSTeK's website touts the device's four usage modes:





See, e.g., Zenbook Flip 13 (UX363) User Manual, pp. 46-47.

ASUSTeK's Willful Infringement

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

121. ASUSTeK claims to have intellectual property management policies "to protect the Company's important intellectual property and avoid infringement by others." ASUSTeK claims to regularly review and adjust these policies to "reduce legal risks." ASUSTeK 2021 Annual Report, pp. 160-161.

122. On information and belief, ASUSTeK has intellectual property management procedures to evaluate whether ASUS products have freedom to operate. *See* ASUSTeK 2021 Annual Report, pp. 160-161. Given these procedures and given ASUSTeK's knowledge of the '688 patent and the related '844 patent since before the filing of this Complaint, if ASUSTeK did not investigate whether the Accused Products infringe the '844 patent, then ASUSTeK was willfully blind to a reasonable likelihood that the Accused Products infringe the '844 patent.

123. The foregoing description of ASUS'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.

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

125. ASUS'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)

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

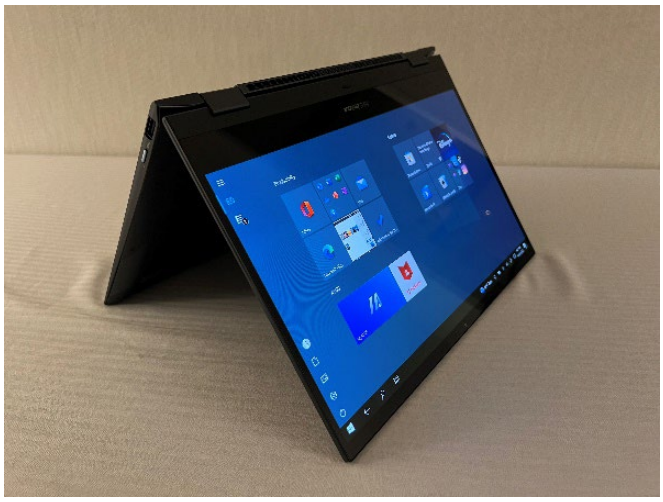
ASGL's Direct Infringement

127. ASGL 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 selling and offering for sale in the United States the Accused Products.

128. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

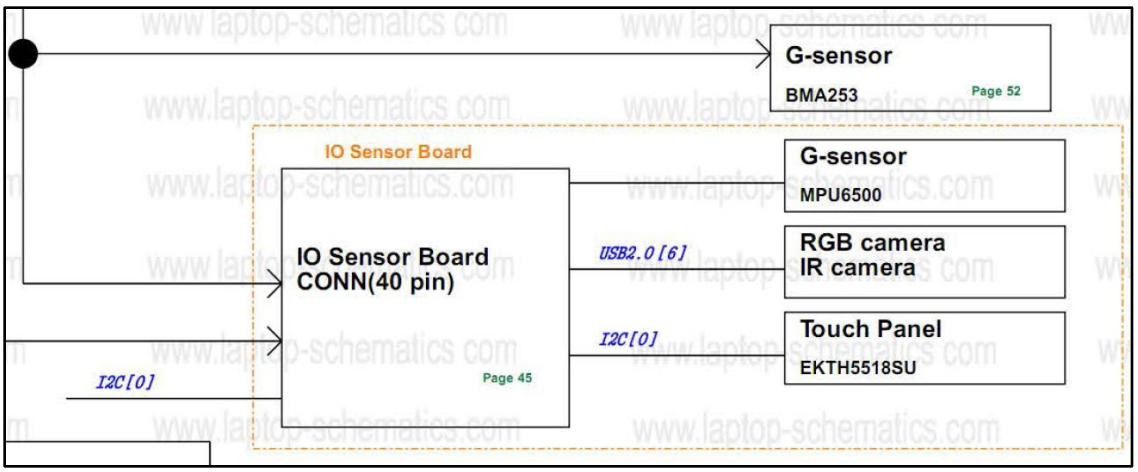
Frame mode



Easel mode

129. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) are portable computers comprising a display component and a base. For example:

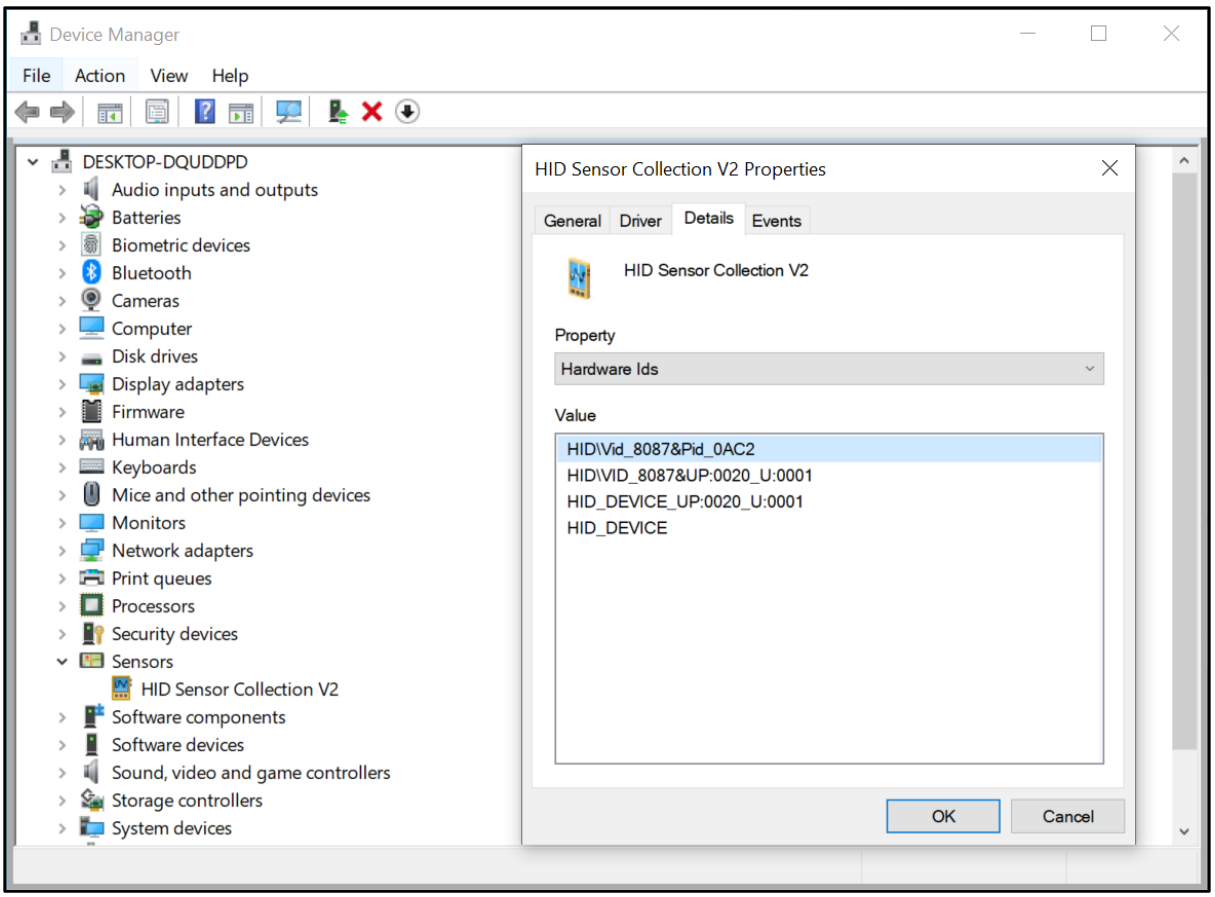
130. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include an accelerometer configured to generate orientation information indicative of a current display mode among the plurality of display modes of the portable computer. For example, the Zenbook Flip 15 includes two "G-Sensors" (i.e., "BMA253" and "MPU6500") shown in the schematic below.



131. BMA253 includes an accelerometer. https://www.bosch-sensortec.com/products/motion-sensors/accelerometers/bma253/

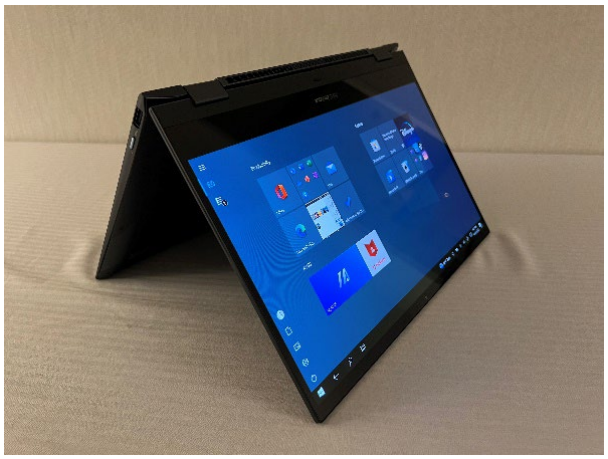
132. MPU-6500 includes an accelerometer. https://invensense.tdk.com/products/motion-tracking/6-axis/mpu-6500/

133. On information and belief, the Accused Products (e.g., the Zenbook Flip 13 (UX363)) use a Human Interface Device (HID) class driver to communicate with an accelerometer. https://learn.microsoft.com/en-us/windows-hardware/drivers/hid/sensor-hid-class-driver. For example:



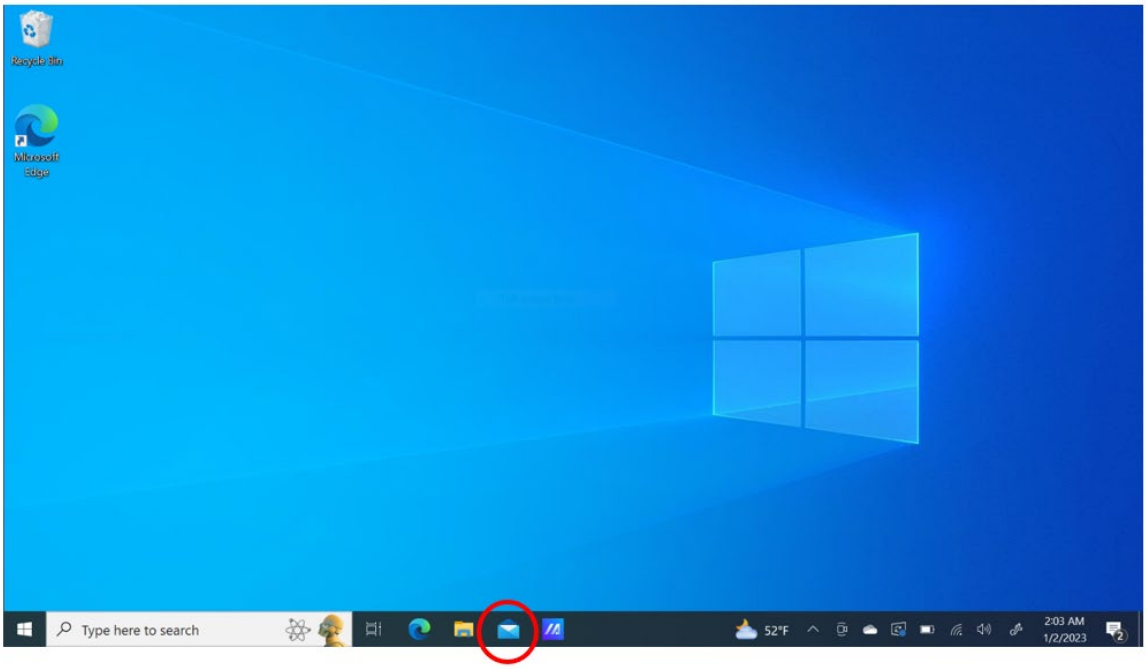
134. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a display manager configured to display computer content on the display component and vary the computer content displayed responsive to the orientation information indicating a transition between at least the laptop and easel modes. For example:

Display content in laptop mode

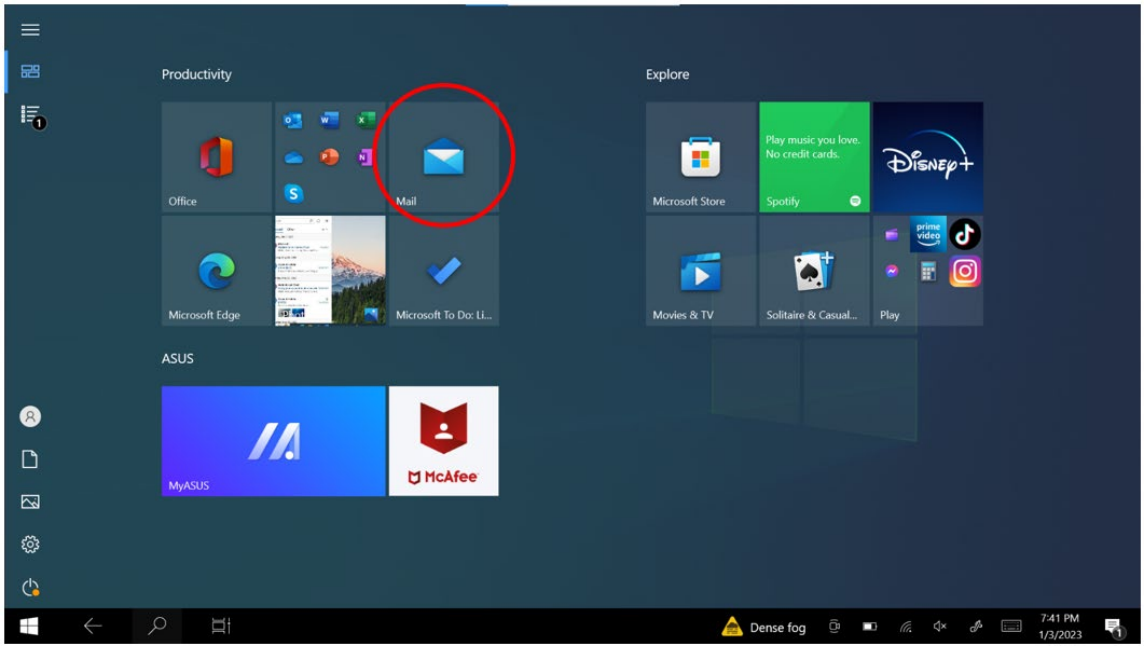


Display content in easel mode

135. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:



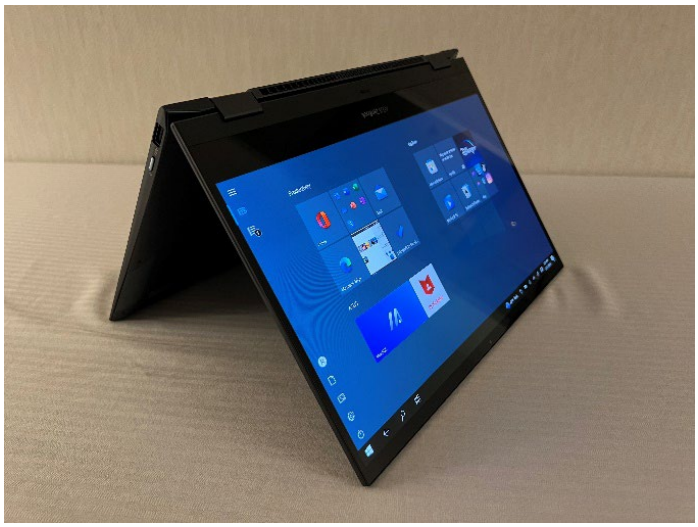
Computer content displayed in laptop mode



Computer content displayed in easel mode

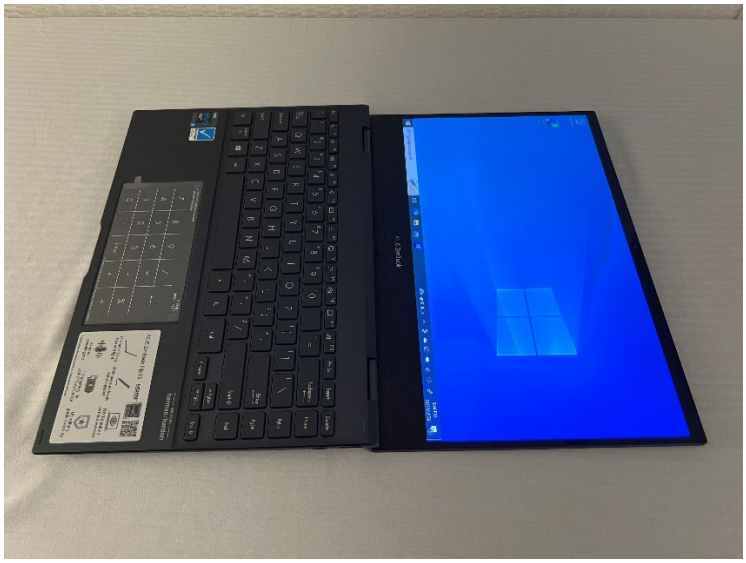
136. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include an interface between the display component and the base defining a longitudinal axis running along the display component and the base about which the display component and the base are rotatable. For example:

See, e.g., Zenbook Flip 13 (UX363) Webpage.



Computer rotated along longitudinal axis

137. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:



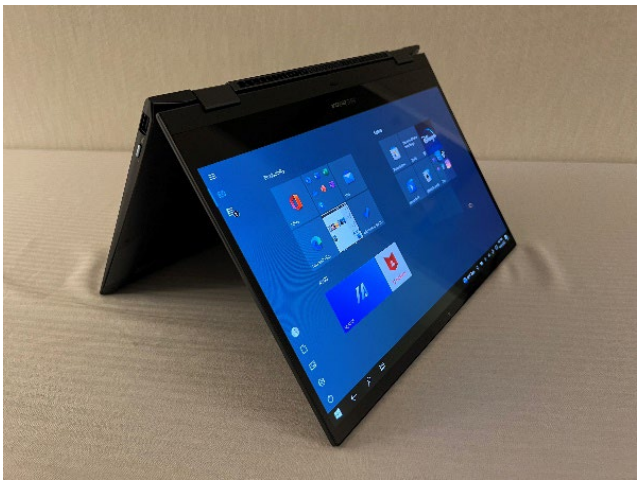
Laptop mode at approximately 180 degrees

138. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

139. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

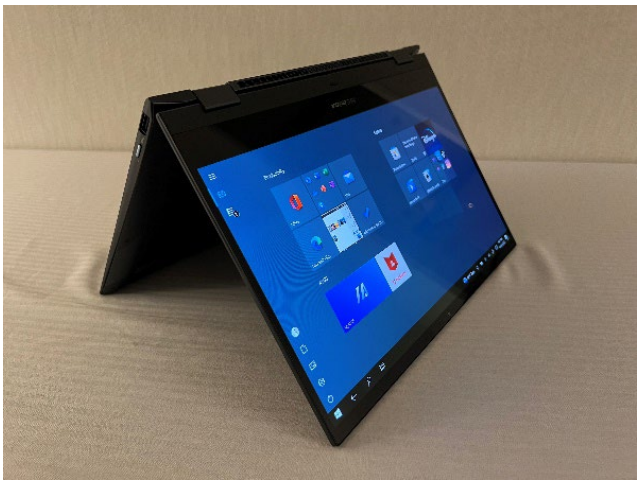


Easel mode

140. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:

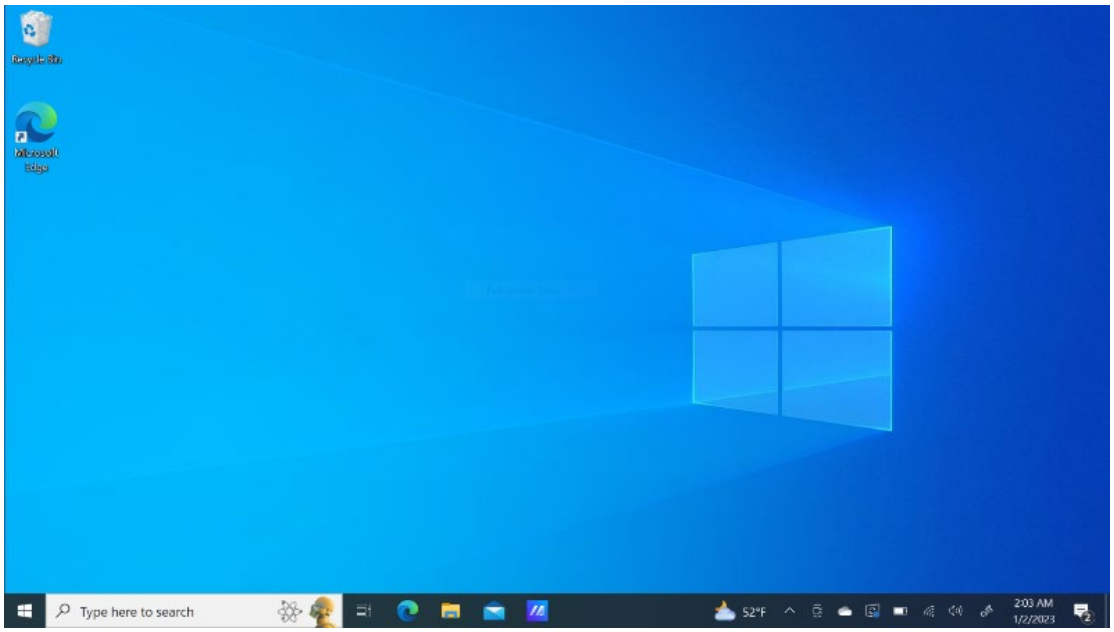
Frame mode

141. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include an interface with the display component positioned toward the operator in easel mode, with the keyboard oriented away from the operator. For example:

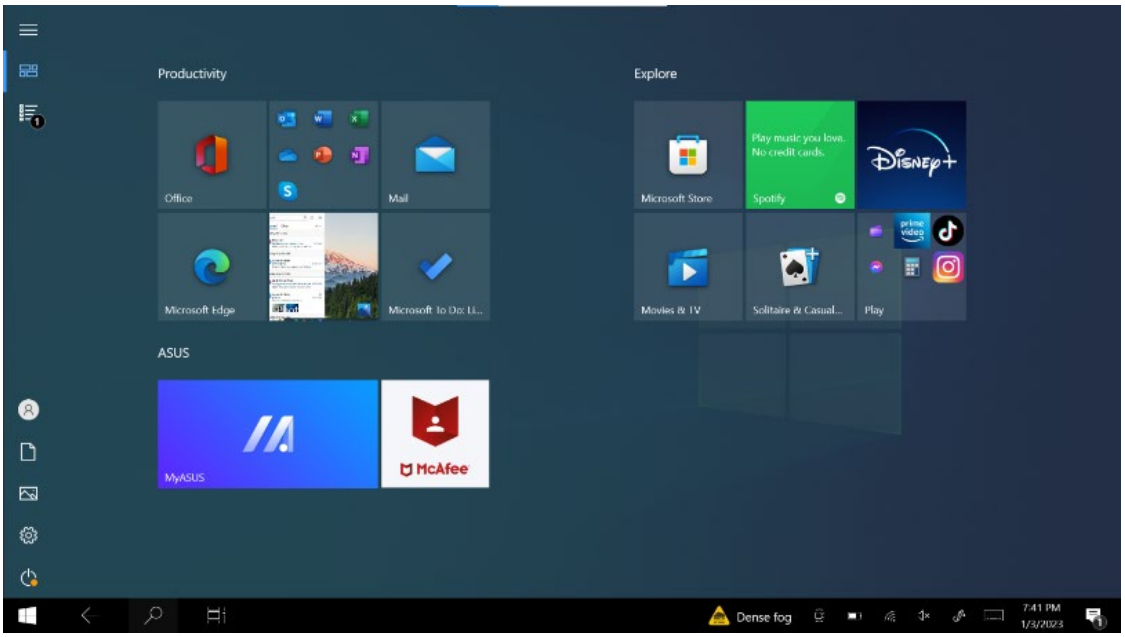


Easel mode

142. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

NOTE: Rotating the screen to Stand, Tent and Tablet mode will disable the keyboard and touchpad.

See, e.g., Zenbook Flip 13 (UX363) User Manual, p. 47.

Induced Infringement by ASGL and ASTP

143. Since at least the filing of this Complaint, ASGL and ASTP know of the ’229 patent and know that the Accused Products infringe at least claim 1 of the ’229 patent when sold or offered for sale by ASGL to ACI, when imported into the United States, when sold or offered for sale ACI or by resellers such as Best Buy and Costco, and when used by customers or other users.

144. Since at least the filing of this Complaint, ASGL induces infringement of the ’229 patent by actively encouraging resellers to directly infringe at least claim 1 of the ’229 patent by selling the Accused Products to ACI, knowing that ACI sells the Accused Products to resellers such as Best Buy and Costco.

145. Since at least the filing of this Complaint, ASTP induces infringement of the ’229 patent by actively encouraging resellers to directly infringe at least claim 1 of the ’229 patent by financing ASGL’s purchase of the Accused Products.

ASUSTeK’s Knowledge of the ’229 Patent

146. Since at least the filing of this Complaint ASUSTeK knows of the ’229 patent.

147. According to ASUSTeK’s 2021 Annual Report, ASUSTeK’s patent applications “are managed by dedicated personnel to ensure the quality of the patent application. Comprehensive management is built through the system to protect the Company’s important intellectual property and avoid infringement by others.” ASUSTeK 2021 Annual Report, pp. 160-161.

148. Given that ASUSTeK personnel are “dedicated” to “comprehensive management” of its patent applications, and given that by 2013 ASUSTeK had become aware of the ’688 patent through ASUSTeK’s prosecution of its own patent applications, on information and belief ASUSTeK would have investigated, become aware of, and considered LiTL’s patents that relate to the ’688 patent, including the ’229 patent, before the filing of this Complaint.

ASUSTeK’s Induced Infringement

149. Since at least the filing of this Complaint, ASUSTeK knows that the Accused Products infringe at least claim 1 of the ’229 patent when used by customers or other users, when sold by ASGL to ACI in the United States, when imported into the United States, and when sold or offered for sale by ACI or by resellers such as Best Buy and Costco.

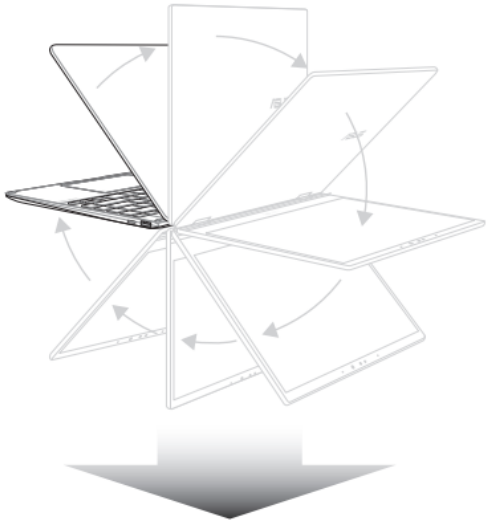
150. Since at least the filing of this Complaint, ASUSTeK induces infringement of the ’229 patent by actively encouraging ACI and resellers such Best Buy and Costco to directly infringe at least claim 1 of the ’229 patent by developing the Accused Products, introducing the

Accused Products into an established distribution channel, and actively encouraging downstream sales and offers for sale of the Accused Products.

151. Since at least the filing of this Complaint, ASUSTeK induces infringement of the ’229 patent by actively encouraging customers or other users to directly infringe at least claim 1 of the ’229 patent. ASUSTeK’s website, https://www.asus.com/us/, provides 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. ASUSTeK’s press release announcing the VivoBook Flip (TP501) touts its “360°-flippable 15.6-inch up to Full HD (1920 x 1080) touchscreen that allows users to flip seamlessly and instantly between laptop, tablet, and other modes.” https://press.asus.com/#/news/details?solo=98. As another example, the Zenbook Flip 13 (UX363) user manual available on ASUSTeK’s website touts the device’s four usage modes:

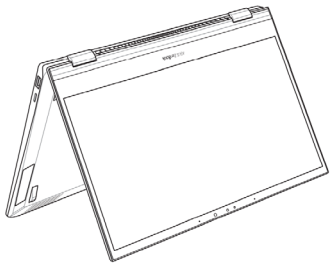
Rotating the display panel

Your Notebook PC's display panel is adjustable up to 360 degrees. You may adjust the display panel as shown below.

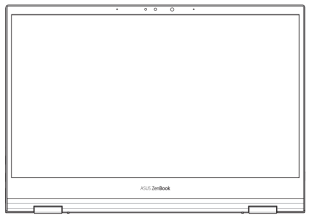


360 degrees adjustable

Stand mode



Tent mode



Tablet mode

Notebook PC mode

See, e.g., Zenbook Flip 13 (UX363) User Manual, pp. 46-47.

ASUSTeK's Willful Infringement

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

153. ASUSTeK claims to have intellectual property management policies "to protect the Company's important intellectual property and avoid infringement by others." ASUSTeK claims to regularly review and adjust these policies to "reduce legal risks." ASUSTeK 2021 Annual Report, pp. 160-161.

154. On information and belief, ASUSTeK has intellectual property management procedures to evaluate whether ASUS products have freedom to operate. *See* ASUSTeK 2021 Annual Report, pp. 160-161. Given these procedures, and given ASUSTeK's knowledge of the '688 patent and the related '229 patent since before the filing of the Complaint, if ASUSTeK did not investigate whether the Accused Products infringe the '229 patent, then ASUSTeK was willfully blind to a reasonable likelihood that the Accused Products infringe the '229 patent.

155. The foregoing description of ASUS'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.

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

157. ASUS'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)

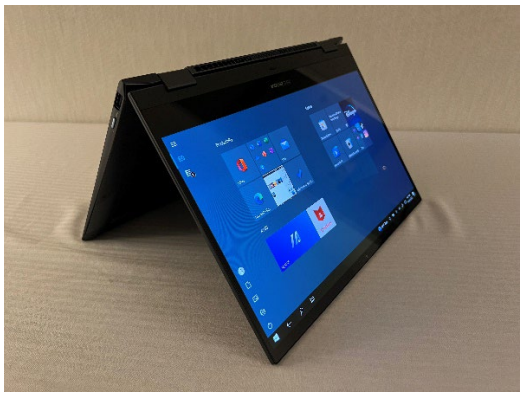
158. LiTL incorporates by reference and realleges all the foregoing paragraphs of the Complaint as if fully set forth herein.

ASGL's Direct Infringement

159. ASGL 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 selling and offering for sale in the United States the Accused Products.

160. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

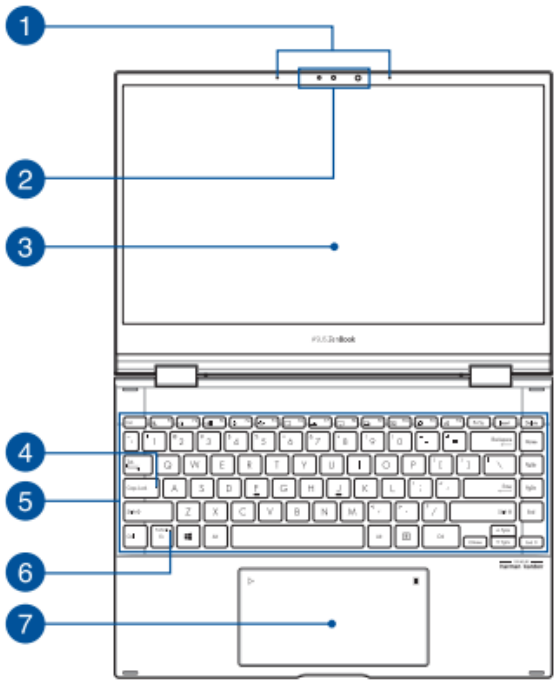


Second mode

Third mode

161. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a display component comprising a surface and a display screen disposed in the surface of the display component. For example:

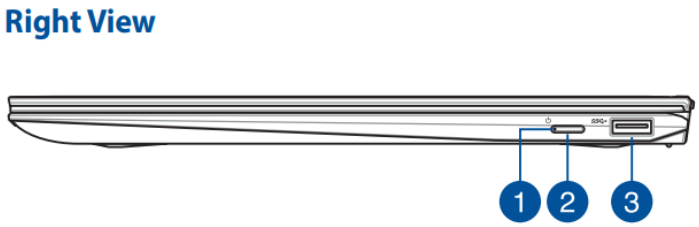
162. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a camera disposed in the surface of the display component. For example:



See, *e.g.*, Zenbook Flip 13 (UX363) User Manual, p. 16, #2.

163. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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.

164. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a power button disposed in the second surface of the base. For example:

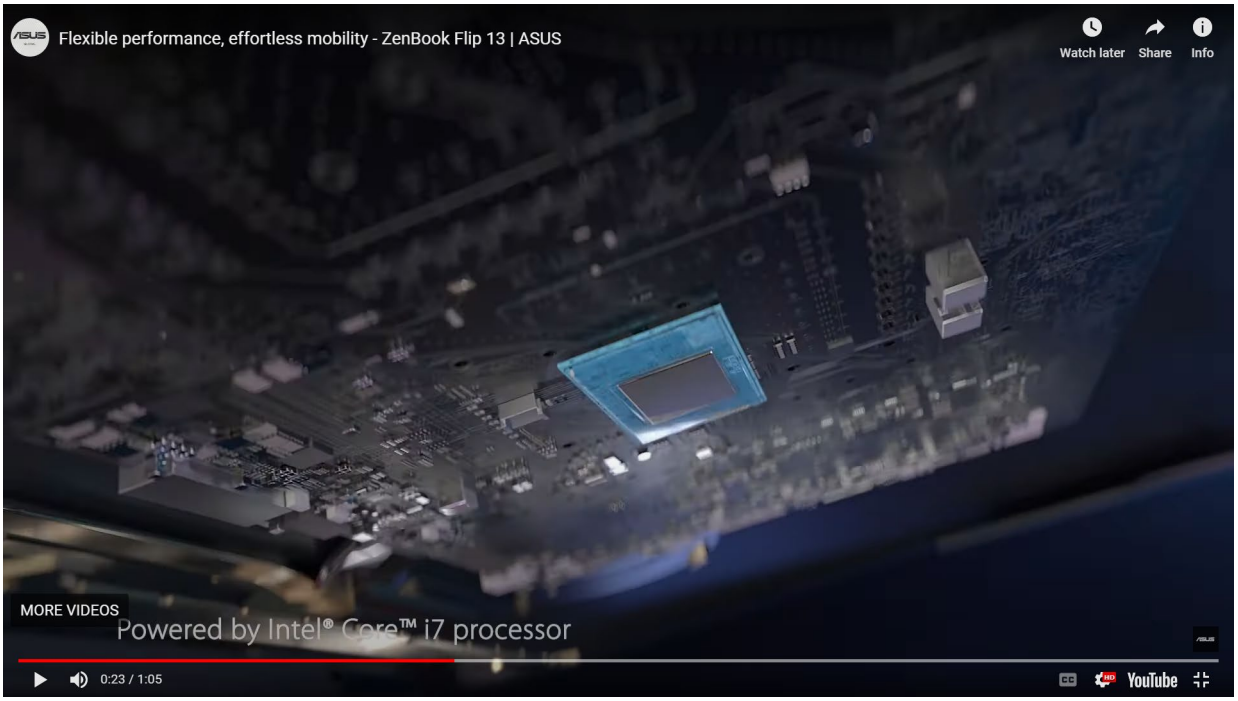


See, *e.g.*, Zenbook Flip 13 (UX363) User Manual, p. 23, #2.

165. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a central processing unit disposed in the base. For example:

Processor	Intel® Core™ i7-1165G7 Processor 2.8 GHz (12M Cache, up to 4.7 GHz, 4 cores) Intel® Core™ i5-1135G7 Processor 2.4 GHz (8M Cache, up to 4.2 GHz, 4 cores)

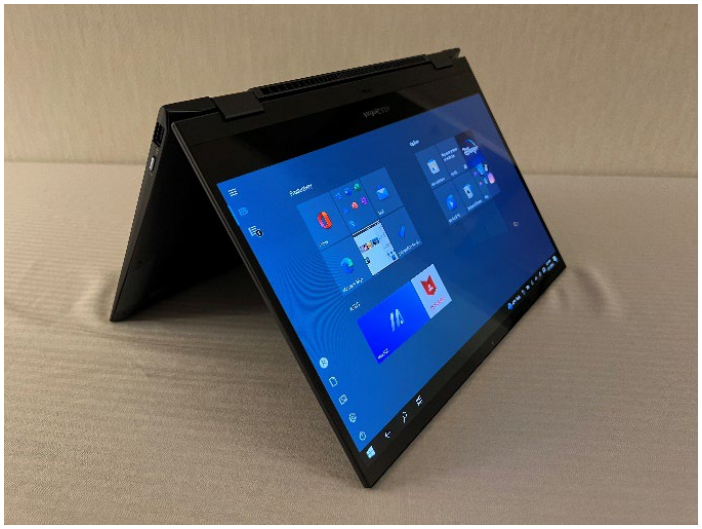
See, *e.g.*, Zenbook Flip 13 (UX363) Specifications.



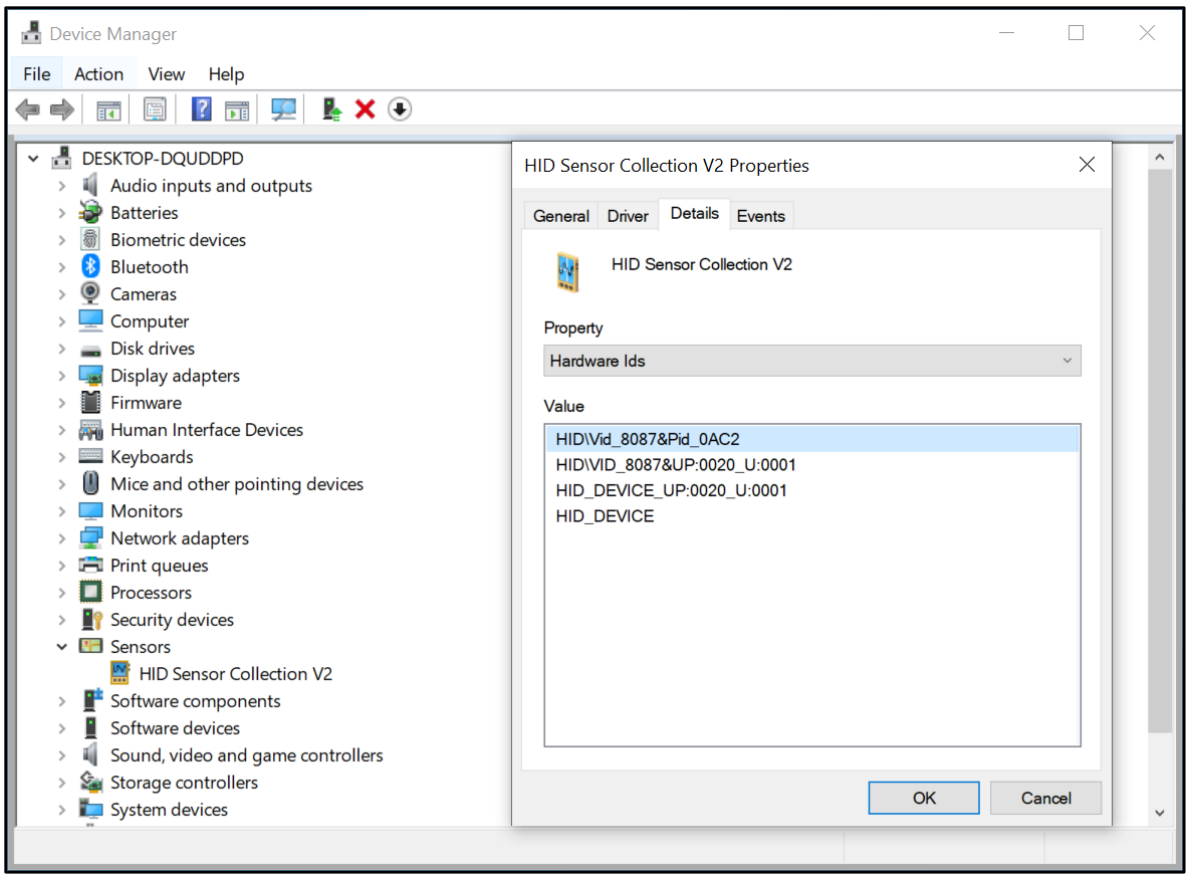
See, e.g., Zenbook Flip 13 (UX363) Video, 0:22-0:25.

166. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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., Zenbook Flip 13 (UX363) Webpage.



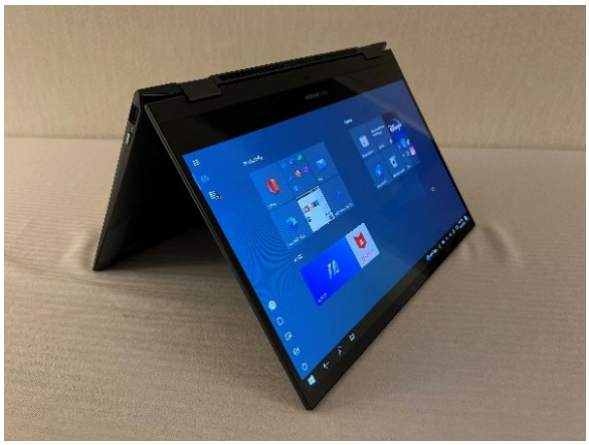
167. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include an orientation sensor configured to generate orientation information indicative of an orientation of at least part of the portable computer. For example:



Zenbook Flip 13 (UX363), Device Manager

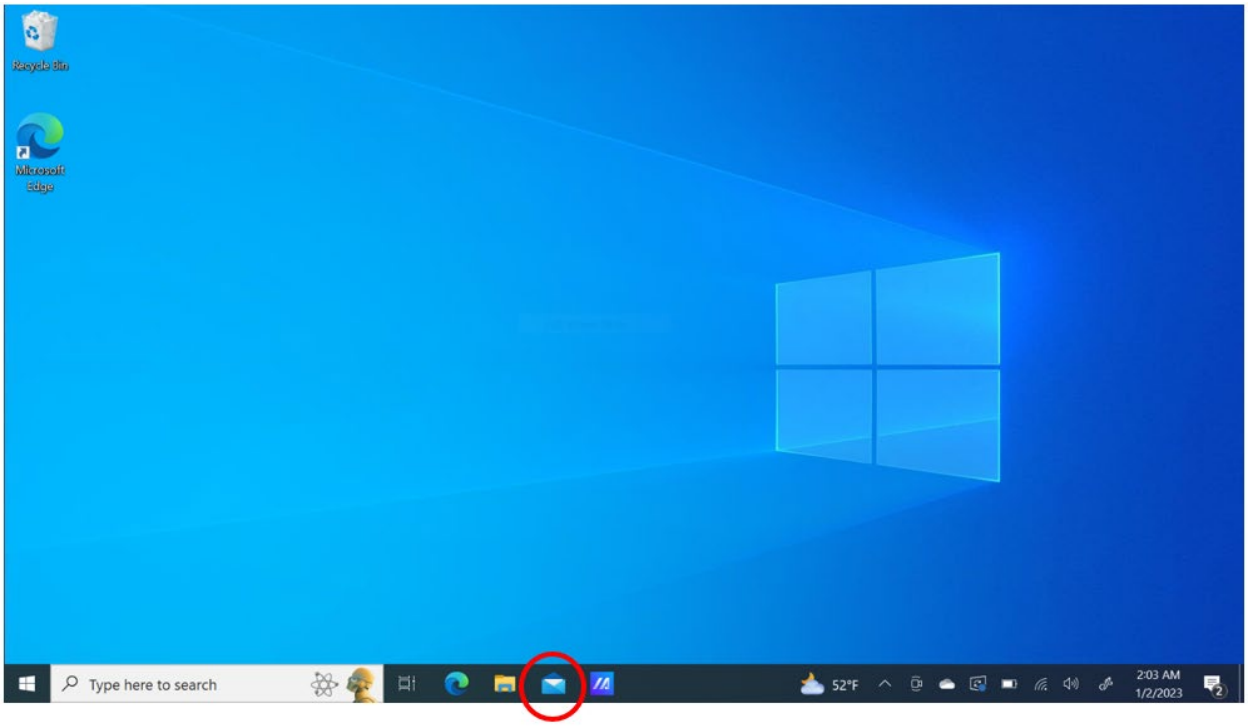
168. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a display manager configured to detect a current display mode from among the plurality of display modes based at least in part on the orientation information, display content in a first orientation when the current display mode is 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 in first mode

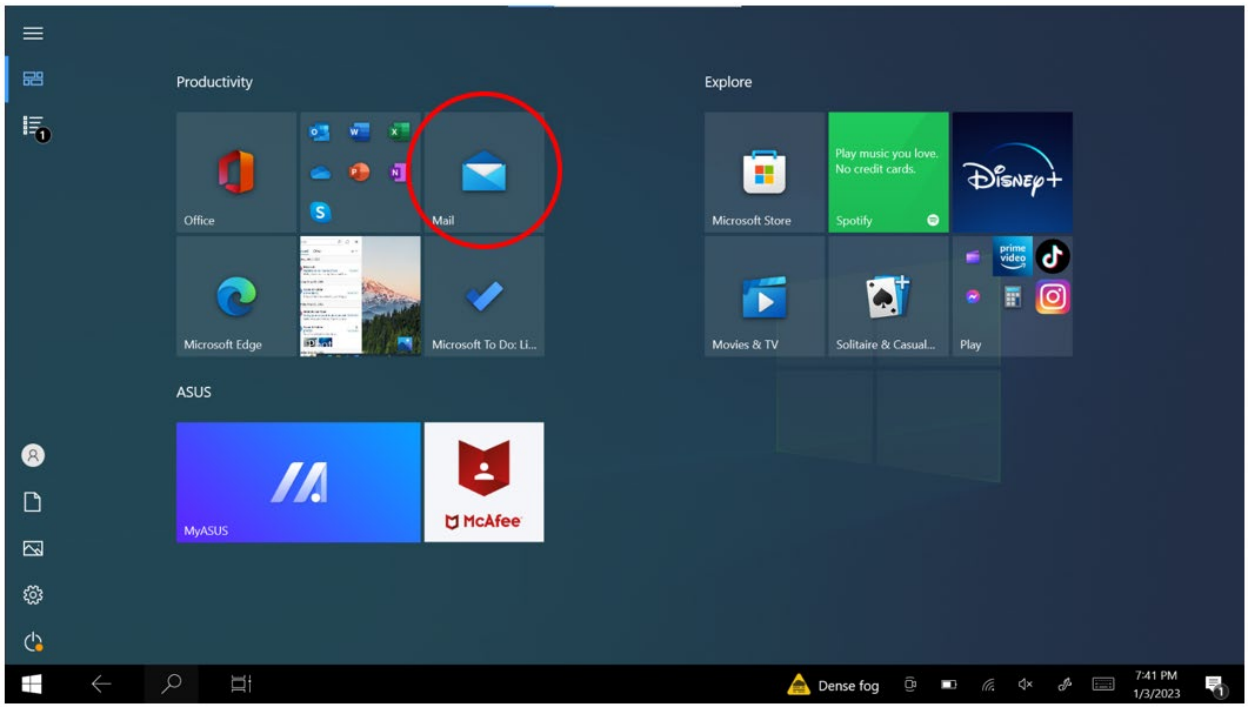


Second orientation in second mode

169. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

Induced Infringement by ASGL and ASTP

170. Since at least the filing of this Complaint, ASGL and ASTP know of the ’154 patent and know that the Accused Products infringe at least claim 11 of the ’154 patent when sold or offered for sale by ASGL to ACI, when imported into the United States, when sold or offered for sale ACI or by resellers such as Best Buy and Costco, and when used by customers or other users.

171. Since at least the filing of this Complaint, ASGL induces infringement of the ’154 patent by actively encouraging resellers to directly infringe at least claim 11 of the ’154 patent by selling the Accused Products to ACI, knowing that ACI sells the Accused Products to resellers such as Best Buy and Costco.

172. Since at least the filing of this Complaint, ASTP induces infringement of the ’154 patent by actively encouraging resellers to directly infringe at least claim 11 of the ’154 patent by financing ASGL’s purchase of the Accused Products.

ASUSTeK's Knowledge of the '154 Patent

173. Since at least the filing of this Complaint, ASUSTeK knows of the '154 patent.

174. According to ASUSTeK's 2021 Annual Report, ASUSTeK's patent applications "are managed by dedicated personnel to ensure the quality of the patent application. Comprehensive management is built through the system to protect the Company's important intellectual property and avoid infringement by others." ASUSTeK 2021 Annual Report, pp. 160-161.

175. Given that ASUSTeK personnel are "dedicated" to "comprehensive management" of its patent applications, and given that by 2013 ASUSTeK had become aware of the '688 patent through ASUSTeK's prosecution of its own patent applications, on information and belief ASUSTeK would have investigated, become aware of, and considered LiTL's patents that relate to the '688 patent, including the '154 patent, before the filing of this Complaint.

ASUSTeK's Induced Infringement

176. Since at least the filing of this Complaint, ASUSTeK knows that the Accused Products infringe at least claim 11 of the '154 patent when used by customers or other users, when sold by ASGL to ACI in the United States, when imported into the United States, and when sold or offered for sale by ACI or by resellers such as Best Buy and Costco.

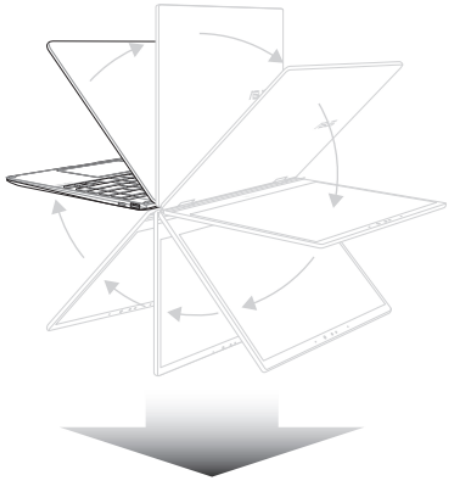
177. Since at least the filing of this Complaint, ASUSTeK induces infringement of the '154 patent by actively encouraging ACI and resellers such Best Buy and Costco to directly infringe at least claim 11 of the '154 patent by developing the Accused Products, introducing the Accused Products into an established distribution channel, and actively encouraging downstream sales and offers for sale of the Accused Products.

178. Since at least the filing of this Complaint, ASUSTeK induces infringement of the '154 patent by actively encouraging customers or other users to directly infringe at least claims

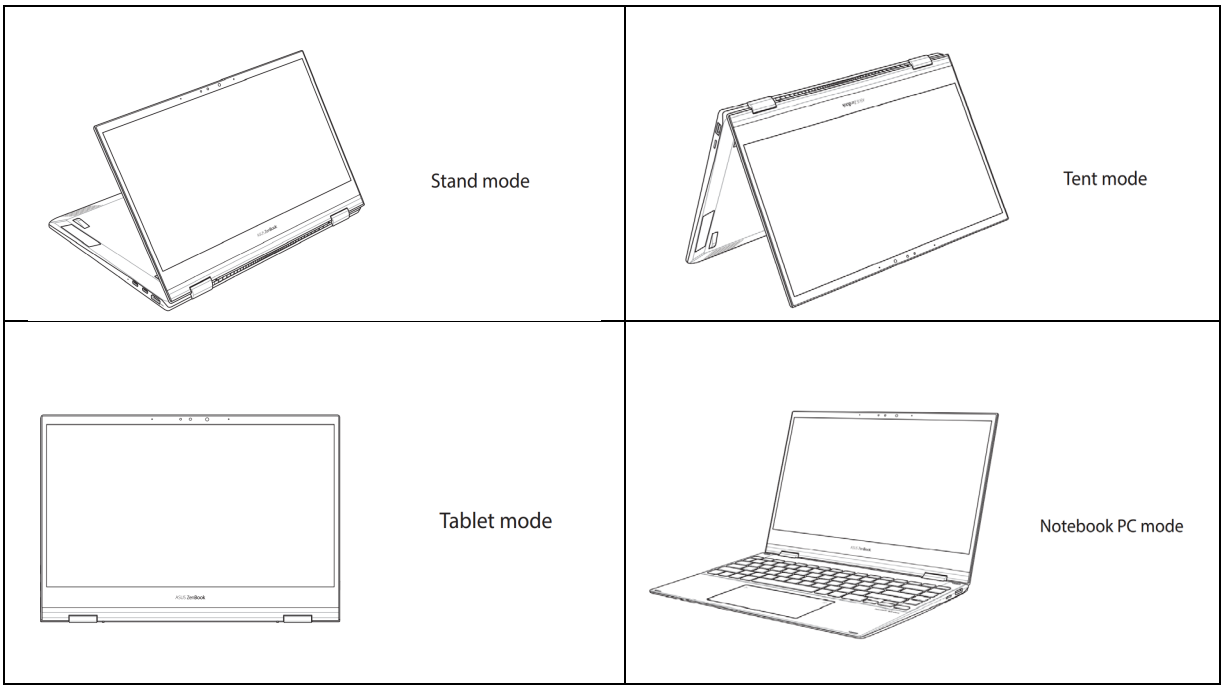
10 and 17 of the ’844 patent. ASUSTeK’s website, https://www.asus.com/us/, provides manuals, product documentation, and advertising materials that induce customers or others to use the Accused Products in a manner that infringes at least claims 10 and 17 of the ’844 patent. ASUSTeK’s press release announcing the VivoBook Flip (TP501) touts its “360°-flippable 15.6-inch up to Full HD (1920 x 1080) touchscreen that allows users to flip seamlessly and instantly between laptop, tablet, and other modes.” https://press.asus.com/#/news/details?solo=98. As another example, the Zenbook Flip 13 (UX363) user manual available on ASUSTeK’s website touts the device’s four usage modes:

Rotating the display panel

Your Notebook PC’s display panel is adjustable up to 360 degrees. You may adjust the display panel as shown below.



360 degrees adjustable



See, e.g., Zenbook Flip 13 (UX363) User Manual, pp. 46-47.

ASUSTeK's Willful Infringement

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

180. ASUSTeK claims to have intellectual property management policies "to protect the Company's important intellectual property and avoid infringement by others." ASUSTeK claims to regularly review and adjust these policies to "reduce legal risks." ASUSTeK 2021 Annual Report, pp. 160-161.

181. On information and belief, ASUSTeK has intellectual property management procedures to evaluate whether ASUS products have freedom to operate. *See* ASUSTeK 2021 Annual Report, pp. 160-161. Given these procedures and given ASUSTeK's knowledge of the '688 patent and the related '154 patent since before the filing of this Complaint, if ASUSTeK did

not investigate whether the Accused Products infringe the ’154 patent, then ASUSTeK was willfully blind to a reasonable likelihood that the Accused Products infringe the ’154 patent.

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

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

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

COUNT V

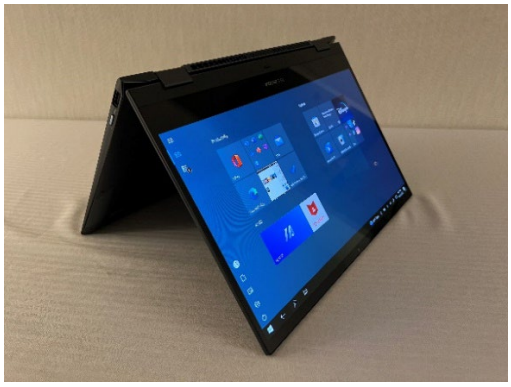
(Infringement of U.S. Patent No. 9,003,315)

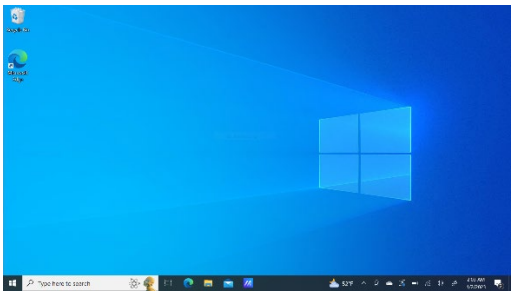
185. LiTL incorporates by reference and realleges all the foregoing paragraphs of the Complaint as if fully set forth herein.

ASGL’s Direct Infringement

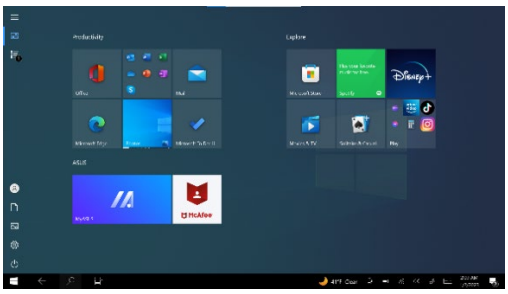
186. ASGL has directly infringed and continues to directly infringe, literally and/or equivalently, one or more claims of the ’315 patent, including at least claim 1, including by selling and offering for sale in the United States the Accused Products.

187. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

188. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include at least one processor and a map based graphical user interface, executing on the at least one processor operatively connected to a memory of the computer system. The map based graphical user interface, when executing, is configured to display information on the display component of the computer system. For example:

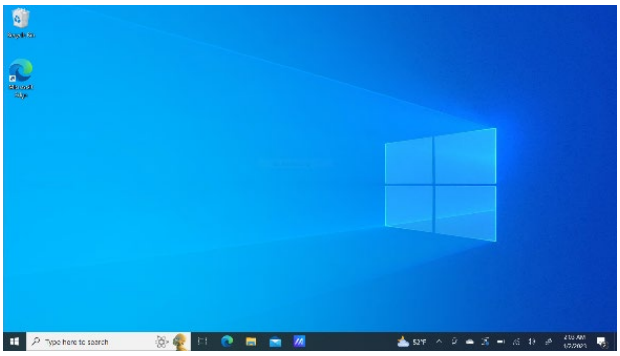
Processor	Intel® Core™ i7-1165G7 Processor 2.8 GHz (12M Cache, up to 4.7 GHz, 4 cores) Intel® Core™ i5-1135G7 Processor 2.4 GHz (8M Cache, up to 4.2 GHz, 4 cores)

Memory	8GB LPDDR4X on board, Memory Max Up to 8GB 16GB LPDDR4X on board, Memory Max Up to 32GB 8GB LPDDR4X on board Total system memory upgradeable to:8GB

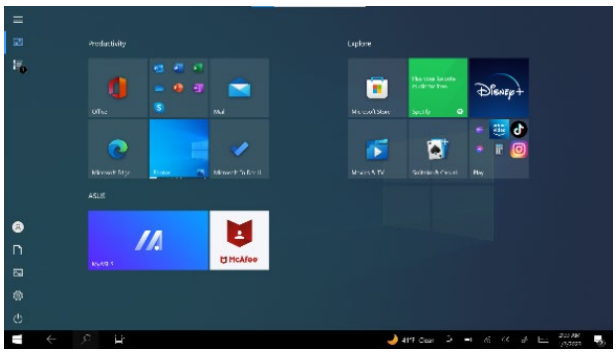
Processor and Memory Specifications

See, e.g., Zenbook Flip 13 (UX363) Specifications.

189. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:



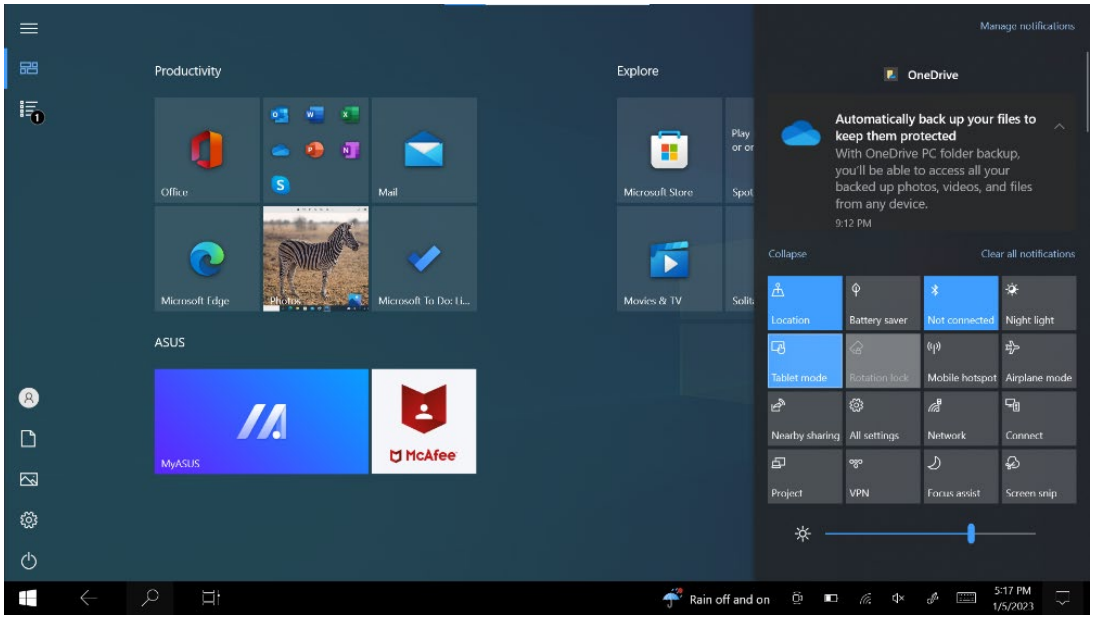
Visual representations of computer content in a first organizational view



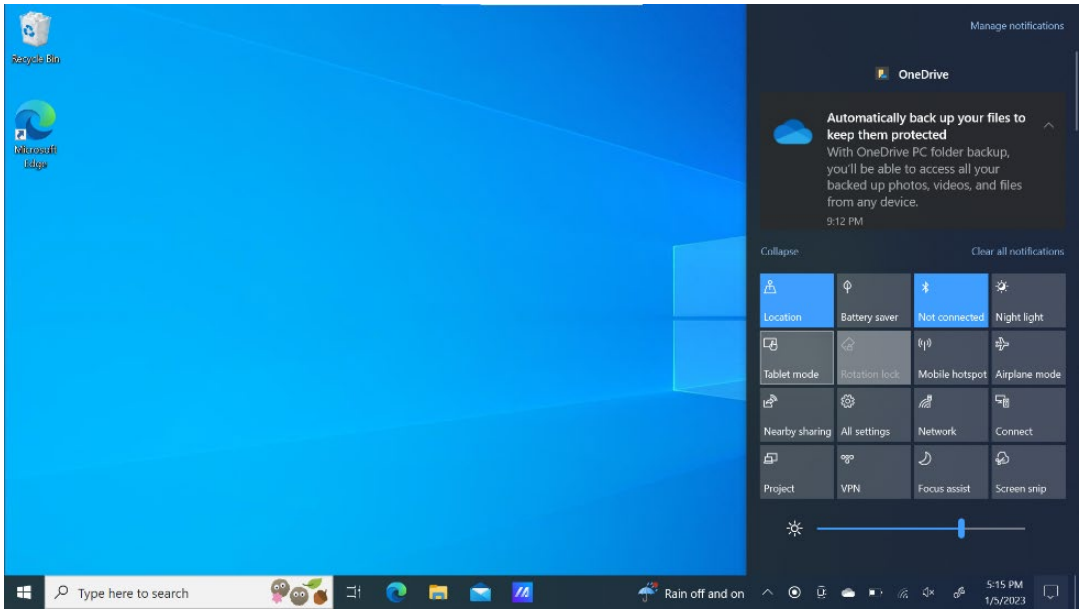
Visual representations of computer content in a second organizational view

190. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:



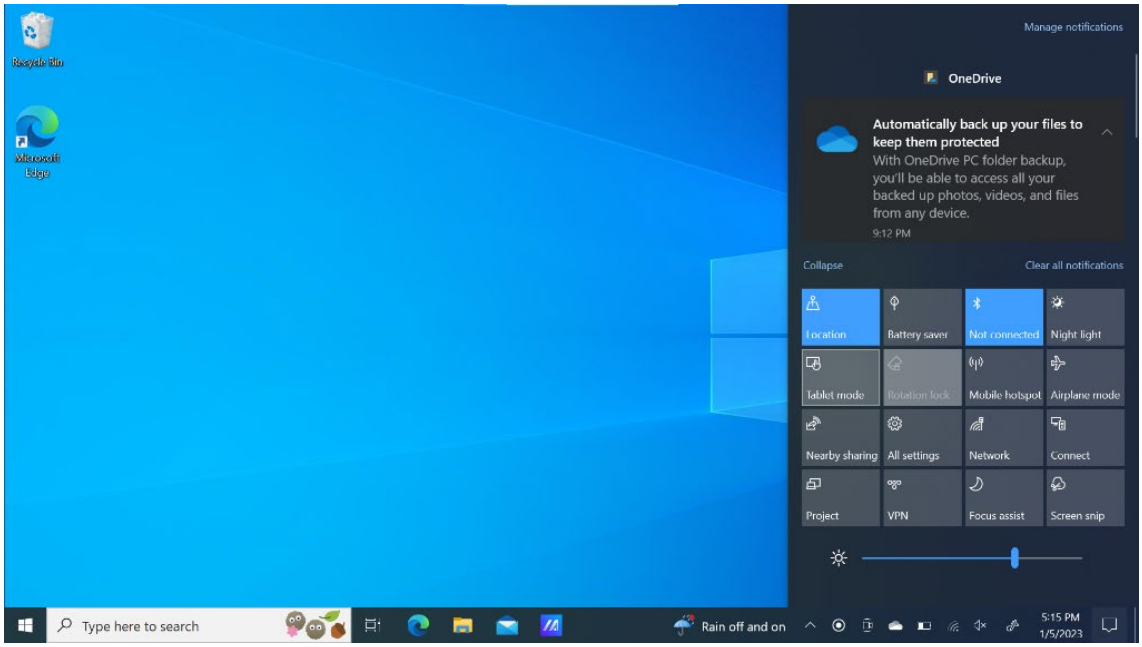
Second organizational view (showing Tablet Mode selected)



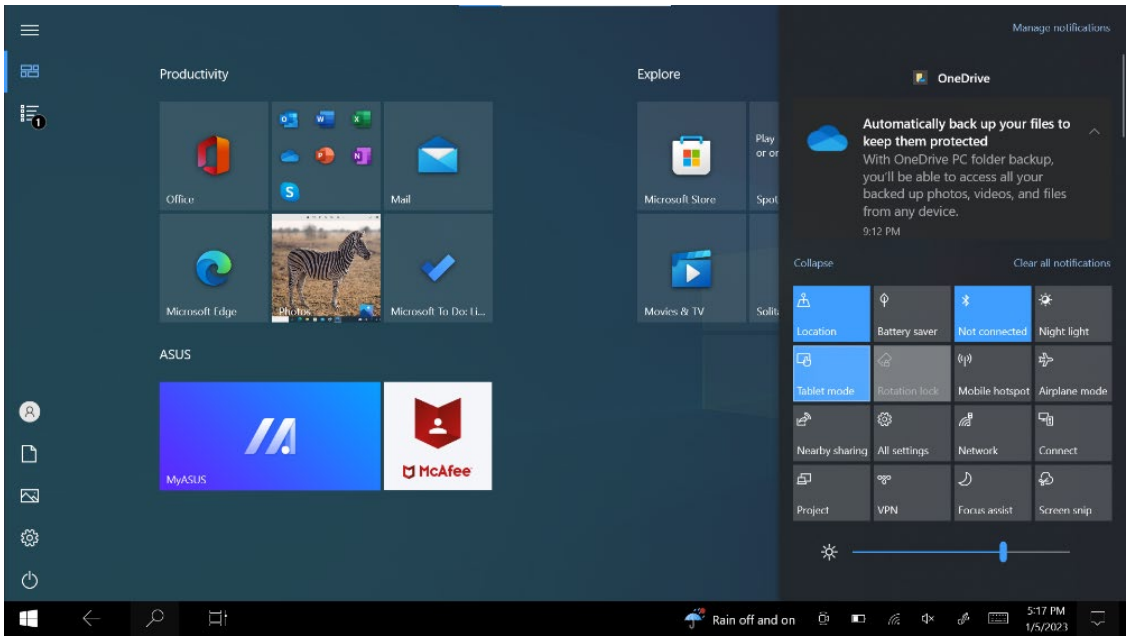
First home view (showing view after Tablet Mode is de-selected)

191. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:

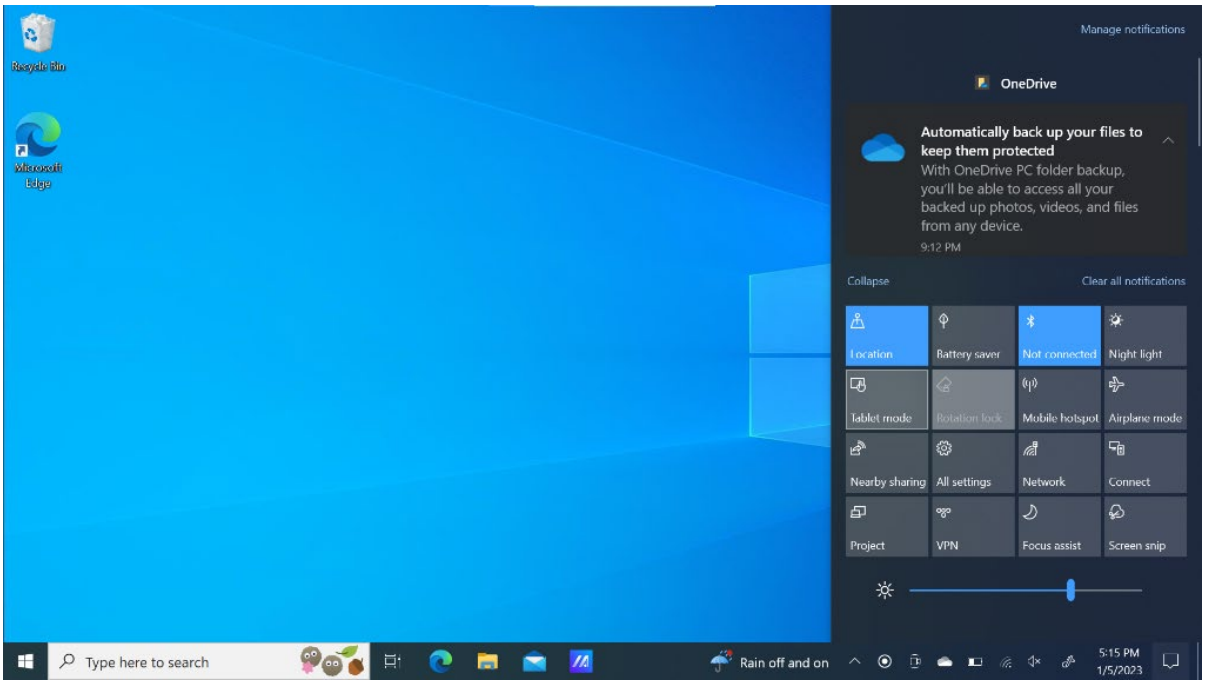


Plurality of visual representations in the first home view
(showing Tablet Mode button responsive to focus)



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

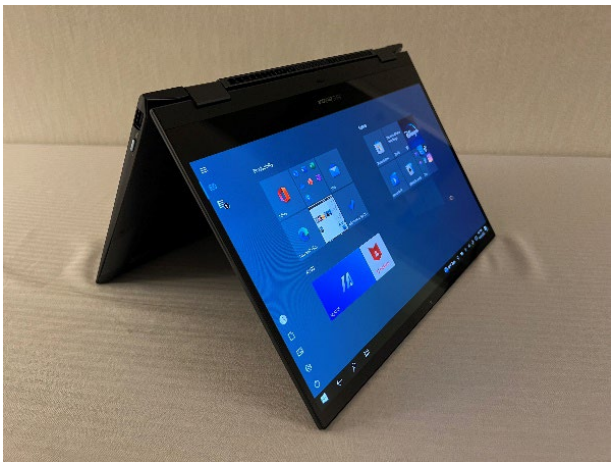
192. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include the first home view as a first organizational view of at least one application and computer content displayed responsive to activation of the system. For example:



First home view

193. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:

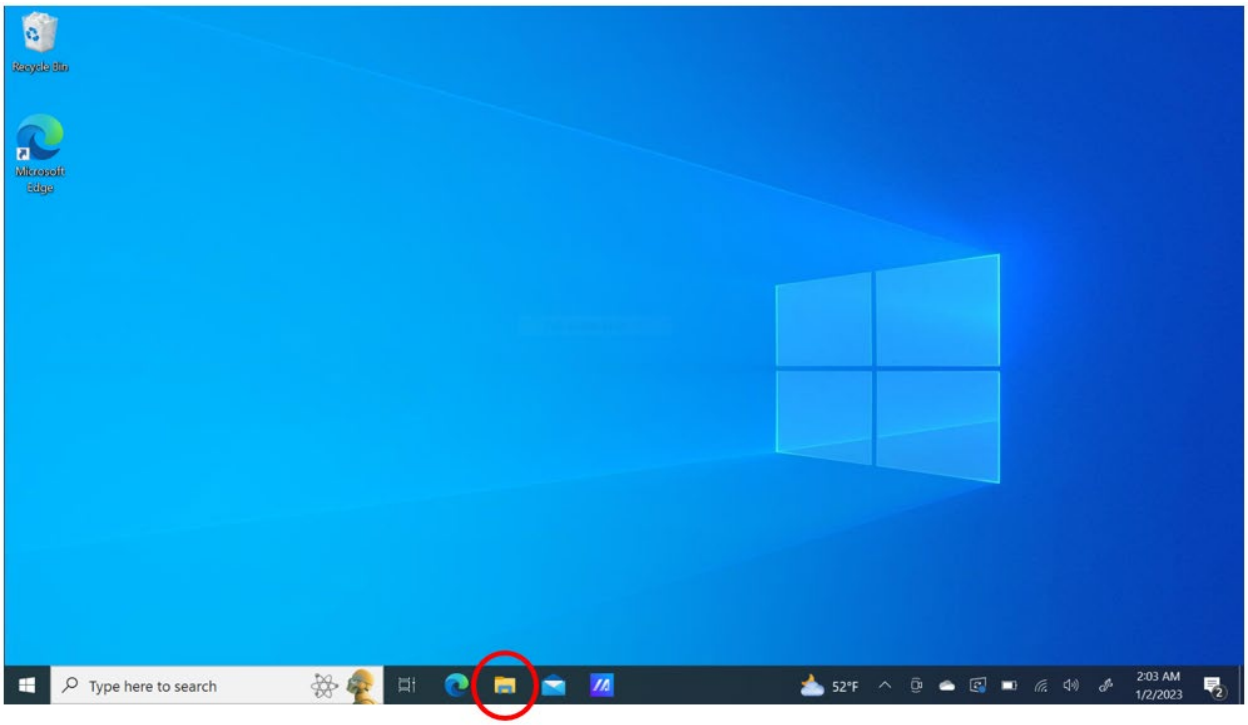
First computer system configuration



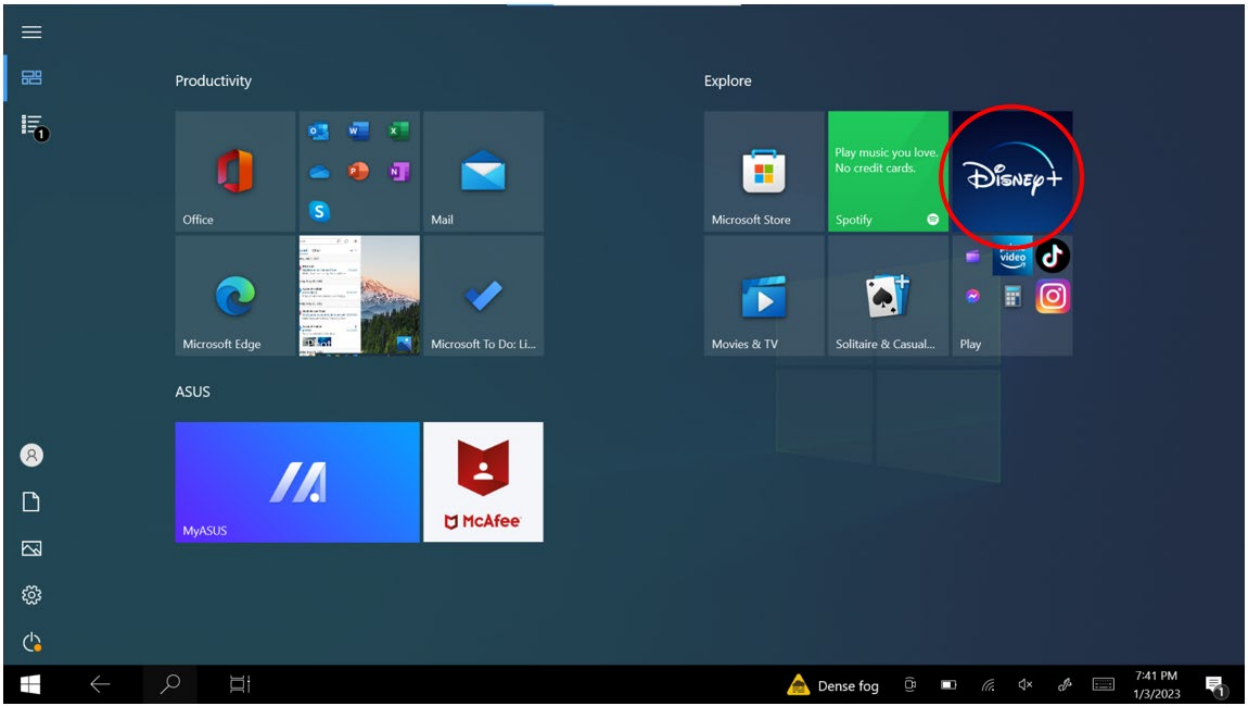
Second computer system configuration

194. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:

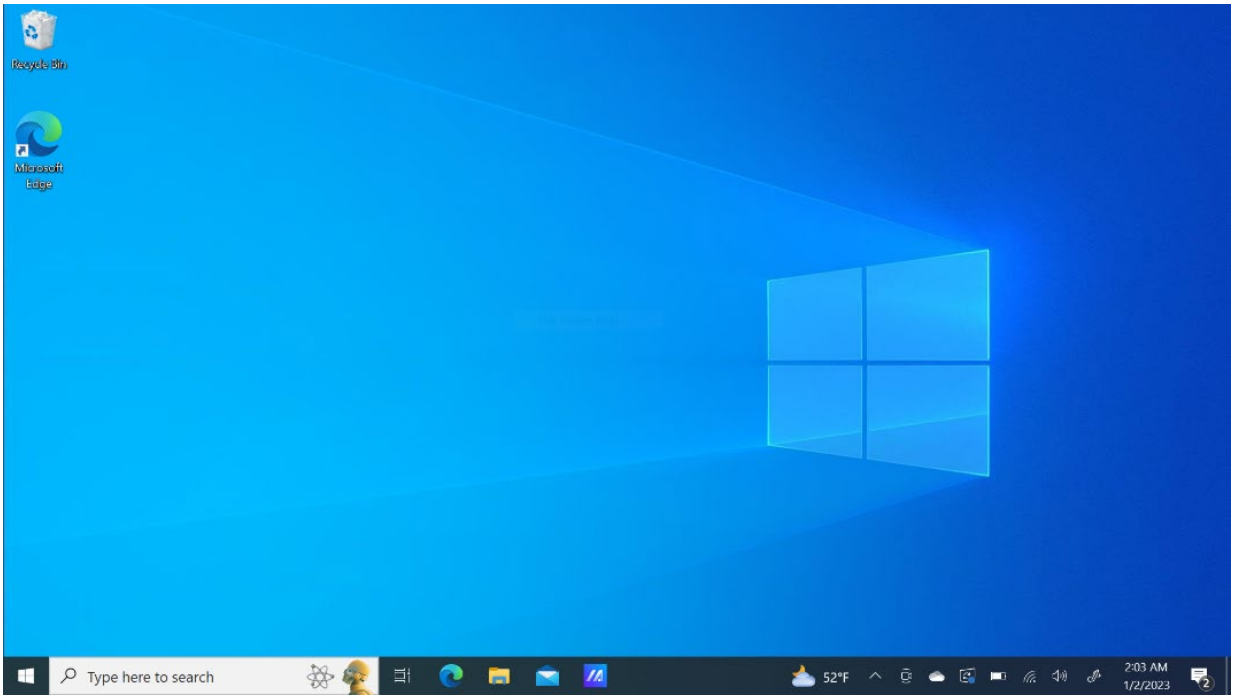


First home view for a first computer system configuration

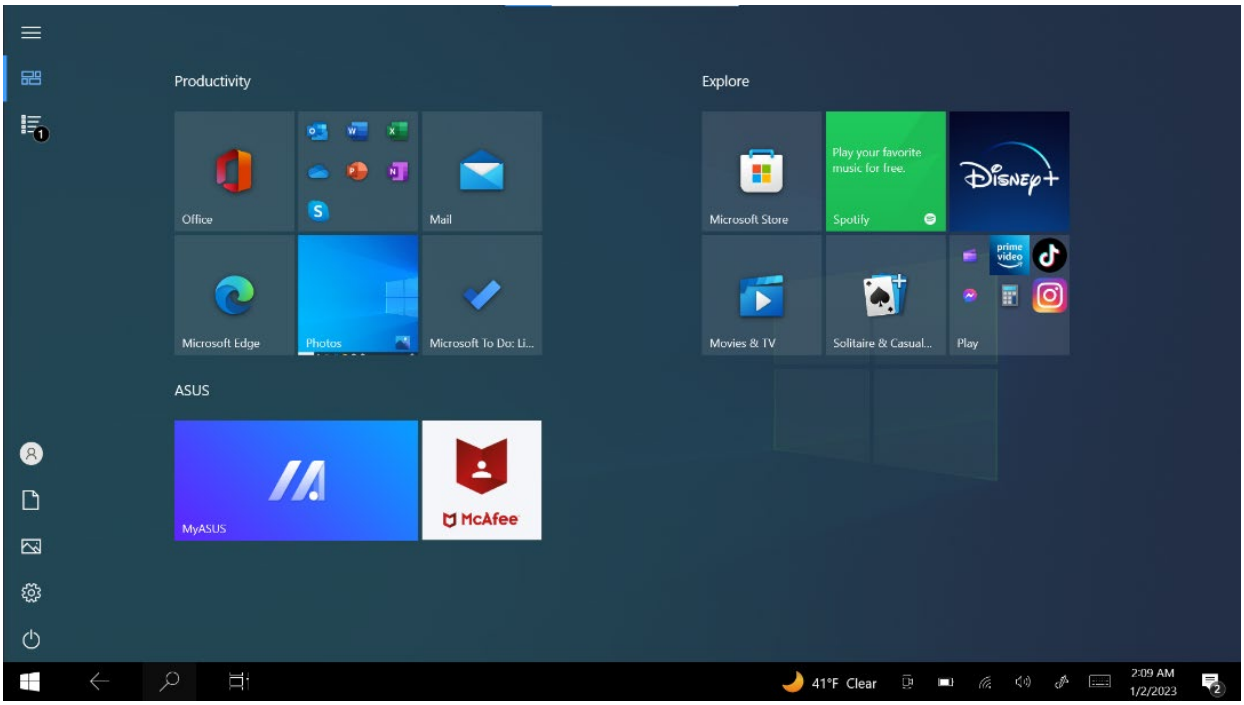


Second organizational view for a second computer system configuration

195. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

Induced Infringement by ASGL and ASTP

196. Since at least the filing of this Complaint, ASGL and ASTP know of the ’315 patent and know that the Accused Products infringe at least claim 1 of the ’315 patent when sold or offered for sale by ASGL to ACI, when imported into the United States, when sold or offered for sale by ACI or by resellers such as Best Buy and Costco, and when used by customers or other users.

197. Since at least the filing of this Complaint, ASGL induces infringement of the ’315 patent by actively encouraging resellers to directly infringe at least claim 1 of the ’315 patent by selling the Accused Products to ACI, knowing that ACI sells the Accused Products to resellers such as Best Buy and Costco.

198. Since at least the filing of this Complaint, ASTP induces infringement of the ’315 patent by actively encouraging resellers to directly infringe at least claim 1 of the ’315 patent by financing ASGL’s purchase of the Accused Products.

ASUSTeK's Knowledge of the '315 Patent

199. Since before the filing of this Complaint, ASUSTeK knew of the '315 patent.

200. The published application that matured into the '315 patent was cited during prosecution of a patent application owned by ASUSTeK.

201. On October 18, 2011, ASUSTeK filed U.S. Patent Application No. 13,275,773 ("the ASUSTeK '773 Application"), entitled "Tablet Electronic Device."

202. ASUSTeK filed a POA signed by Tsung Tan Shih, who is identified as ASUSTeK's Chief Executive Officer.

SIGNATURE of Assignee of Record The individual whose signature and title is supplied below is authorized to act on behalf of the assignee			
Signature	Shih, Tsung-Tang	Date	September 12,2008
Name	Shih, Tsung Tang	Telephone	
Title	Chief Executive Officer		

203. On June 10, 2013, the USPTO issued an office action rejecting ASUSTeK's pending claims. In the accompanying Notice of References cited, the examiner cited U.S. Pub. No. 2009/0303676 ("the '676 LiTL Publication"), which is publication of the application that issued as the '315 patent.

204. On September 2, 2014, the ASUSTeK '773 Application issued as U.S. Patent No. 8,824,134, identifies the '676 LiTL Publication on the face of the patent under the "References Cited" section.

205. According to ASUSTeK's 2021 Annual Report, ASUSTeK's patent applications "are managed by dedicated personnel to ensure the quality of the patent application. Comprehensive management is built through the system to protect the Company's important intellectual property and avoid infringement by others." ASUSTeK 2021 Annual Report, pp. 160-161.

206. Given that ASUSTeK personnel are "dedicated" to "comprehensive management" of its patent applications, and given that by 2013 ASUSTeK had become aware of the '688 patent through ASUSTeK's prosecution of its own patent applications, and given that by 2013 ASUSTeK had become aware of the LiTL '676 Publciation, on information and belief ASUSTeK would have investigated, become aware of, and considered LiTL's patents that relate to the '688 patent, including the '315 patent, before the filing of this Complaint.

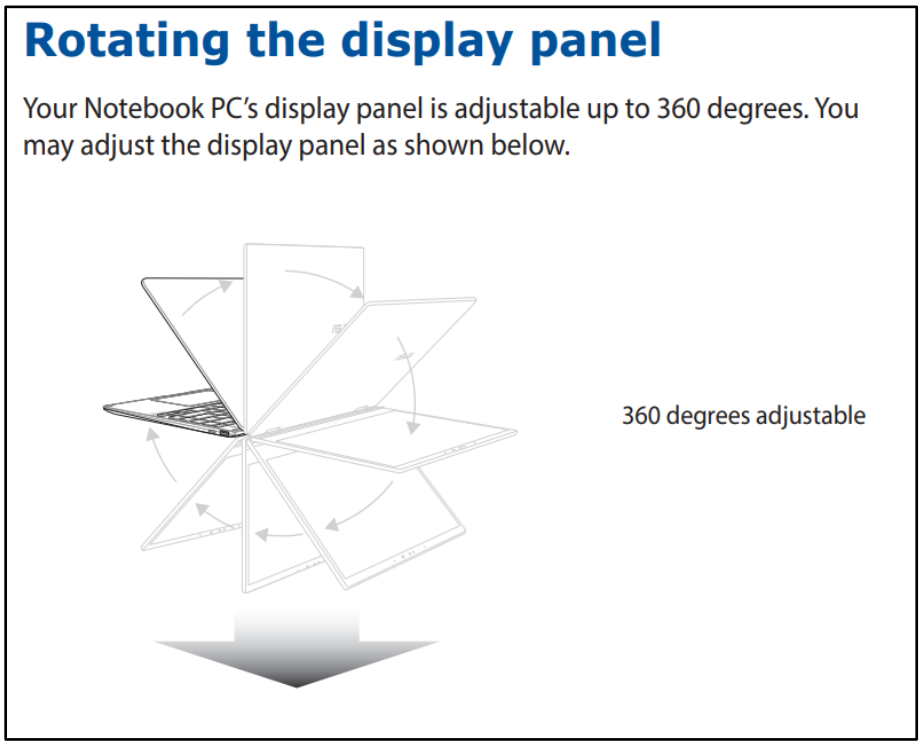
ASUSTeK's Induced Infringement

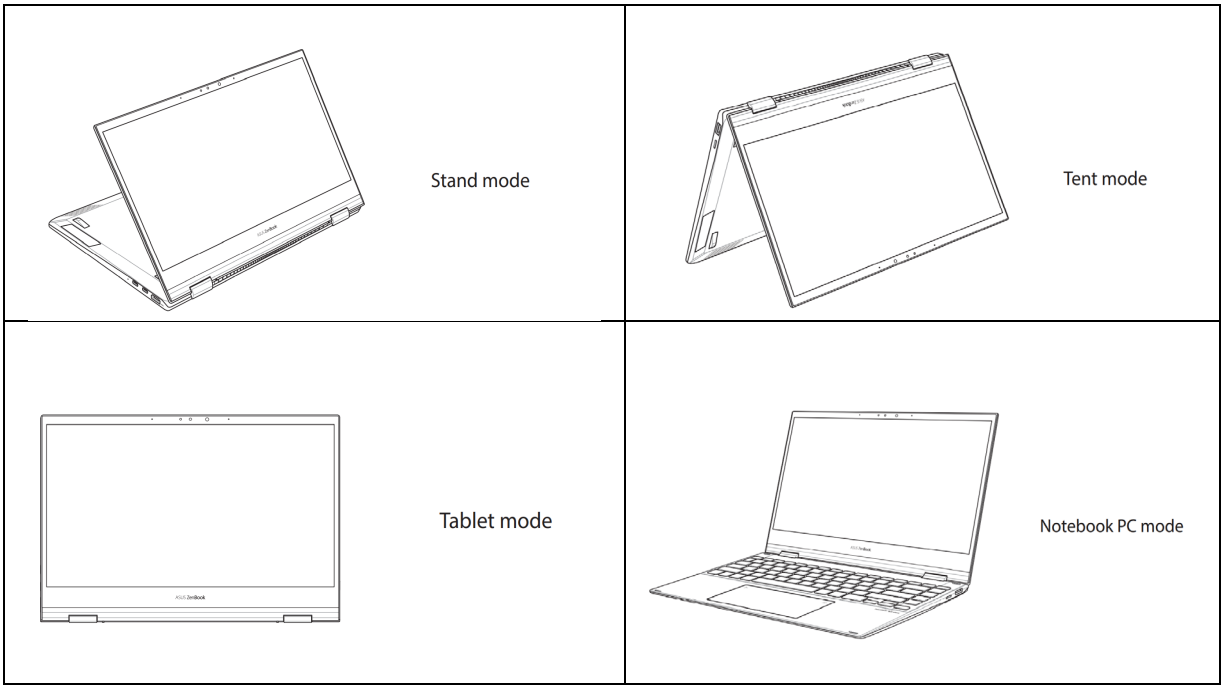
207. Before the filing of this Complaint, ASUSTeK knew that the Accused Products infringe at least claim 1 of the '315 patent when used by customers or other users, when sold by ASGL to ACI in the United States, when imported into the United States, and when sold or offered for sale by ACI or by resellers such as Best Buy and Costco.

208. Before the filing of this Complaint, ASUSTeK induced infringement and continues to induce infringement of the '315 patent by actively encouraging ACI and resellers such Best Buy and Costco to directly infringe at least claim 1 of the '315 patent by developing the Accused Products, introducing the Accused Products into an established distribution channel, and actively encouraging downstream sales and offers for sale of the Accused Products.

209. Before the filing of this Complaint, ASUSTeK induced infringement and continues to induce infringement of the '315 patent by actively encouraging customers or other users to directly infringe at least claim 1 of the '315 patent. ASUSTeK's website, https://www.asus.com/us/, provides 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, ASUSTeK's press release announcing the VivoBook Flip (TP501) toutss its "360°-flippable 15.6-inch up to Full HD (1920 x 1080) touchscreen that allows users to flip seamlessly and instantly between laptop, tablet, and other modes."

https://press.asus.com/#/news/details?solo=98. As another example, the Zenbook Flip 13 (UX363) user manual available on ASUSTeK's website touts the device's four usage modes:





See, e.g., Zenbook Flip 13 (UX363) User Manual, pp. 46-47.

ASUSTeK's Willful Infringement

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

211. As indicated by statements in its most recent annual report, ASUSTeK has intellectual property management procedures to evaluate whether ASUS products have freedom to operate. ASUSTeK 2021 Annual Report, pp. 160-161. Given these procedures and given ASUSTeK's knowledge of the '688 patent and the related '315 patent since before the filing of the Complaint, if ASUSTeK did not investigate whether the Accused Products infringe the '315 patent, then ASUSTeK was willfully blind to a reasonable likelihood that the Accused Products infringe the '315 patent.

212. The foregoing description of ASUS'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.

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

214. ASUS's infringement of the '315 patent has damaged and continues to damage LiTL in an amount yet to be determined, of at least a reasonable royalty.

COUNT VI

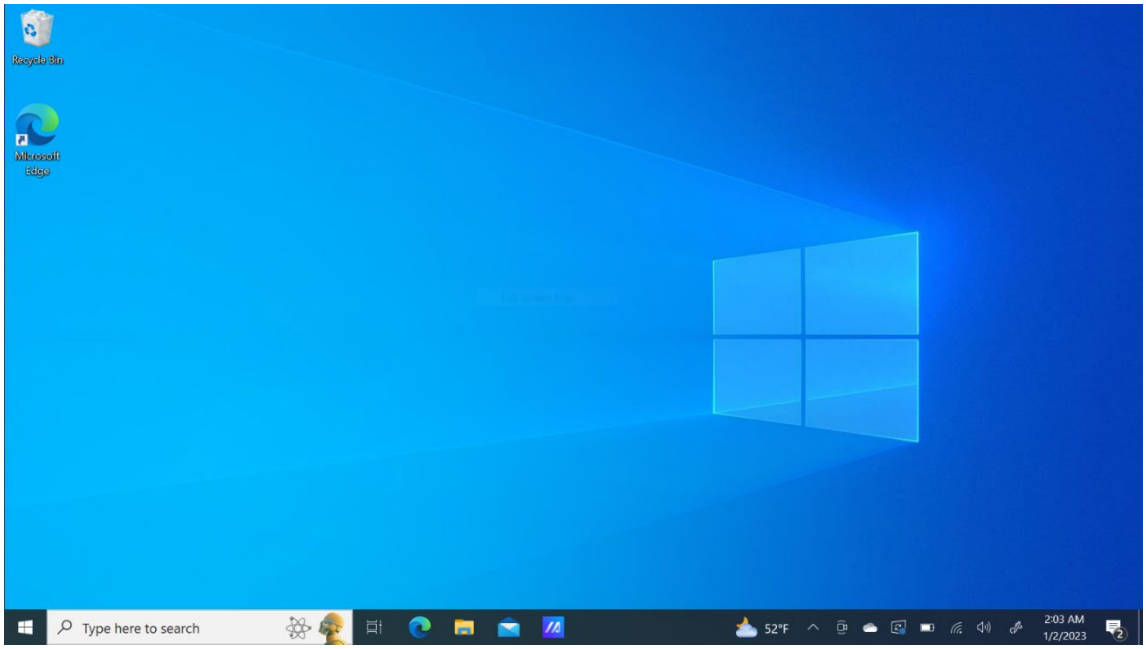
(Infringement of U.S. Patent No. 9,880,715)

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

ASGL's Direct Infringement

216. ASGL 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 selling and offering for sale in the United States the Accused Products.

217. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

218. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a user interface comprising at least one processor operatively connected to a memory of the computer system. For example:

Processor	Intel® Core™ i7-1165G7 Processor 2.8 GHz (12M Cache, up to 4.7 GHz, 4 cores) Intel® Core™ i5-1135G7 Processor 2.4 GHz (8M Cache, up to 4.2 GHz, 4 cores)

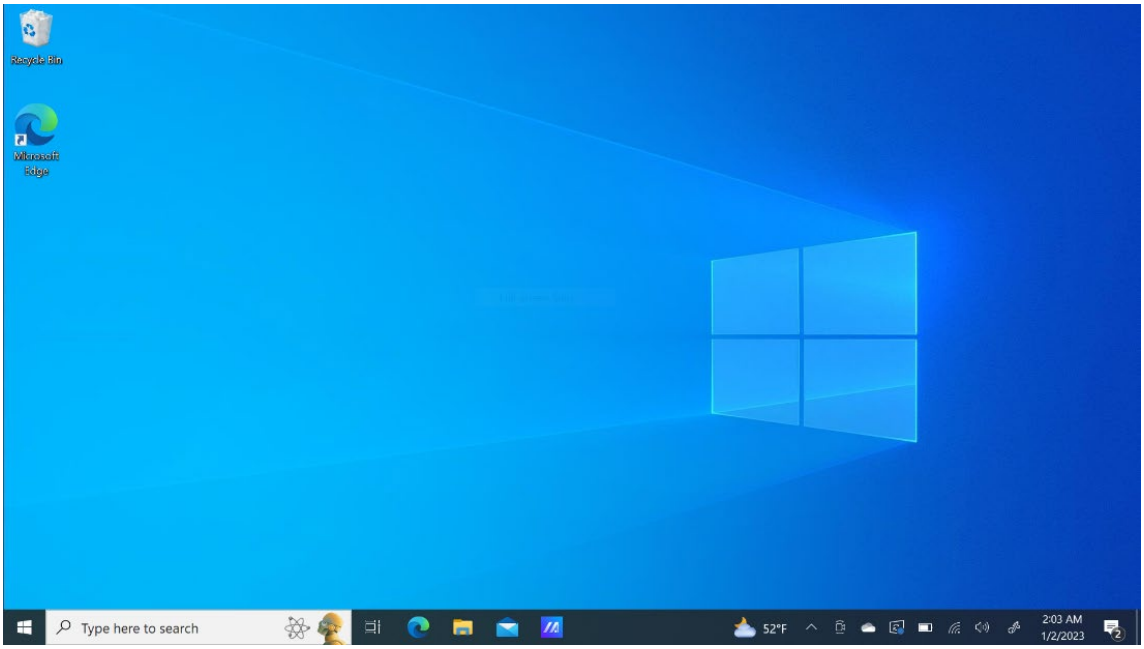
Memory	8GB LPDDR4X on board, Memory Max Up to 8GB 16GB LPDDR4X on board, Memory Max Up to 32GB 8GB LPDDR4X on board Total system memory upgradeable to:8GB

Processor and Memory Specifications

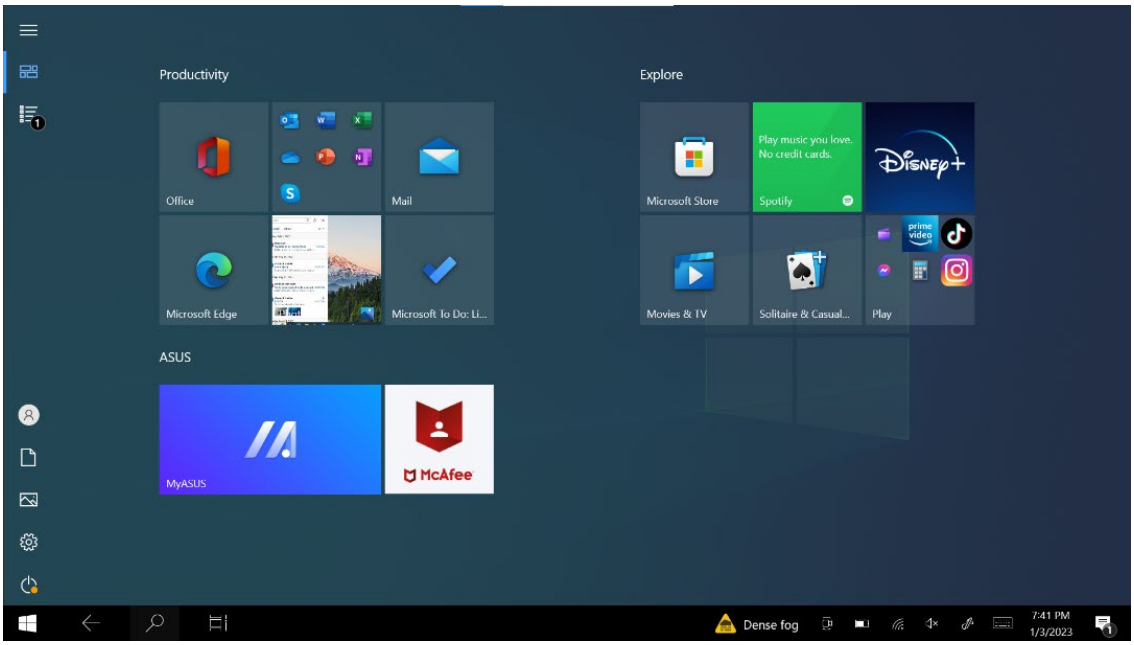
See, e.g., Zenbook Flip 13 (UX363) Specifications.

219. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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:

220. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a graphical user interface configured to display a plurality of views of a plurality of visual representations of computer content. For example, the Zenbook Flip 13 (UX363) is configured to display a home screen in laptop mode and a home screen in tablet mode:

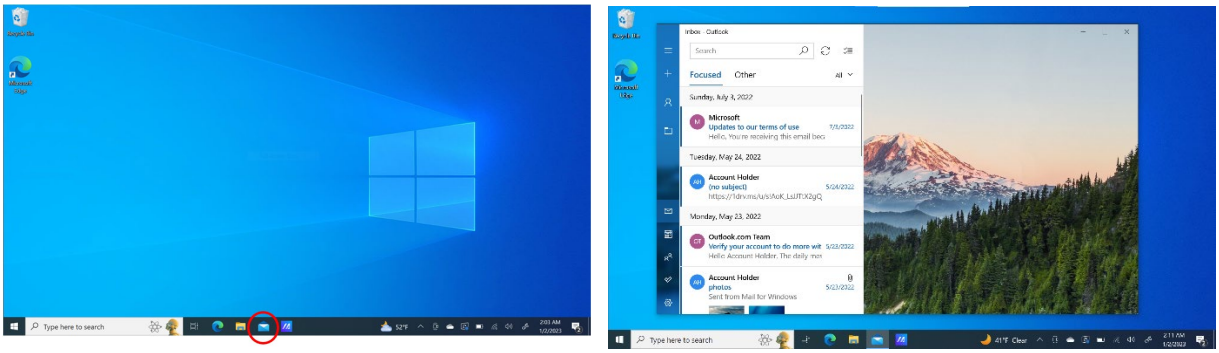


First view

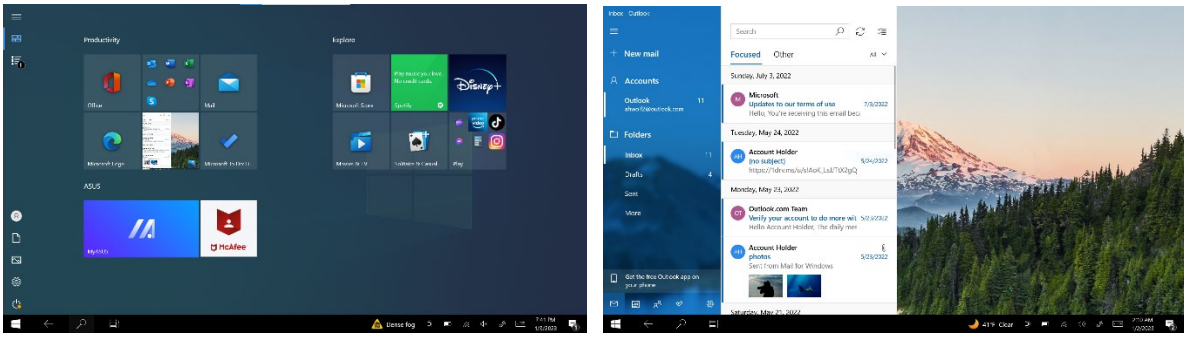


Second view

221. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include computer content that includes at least one of selectable digital content, selectable computer operations and passive digital content. For example, the Microsoft Mail app can be selected from the task bar in laptop mode and in tablet mode:



Microsoft Mail selected in first view



Microsoft Mail selected in second view.

222. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

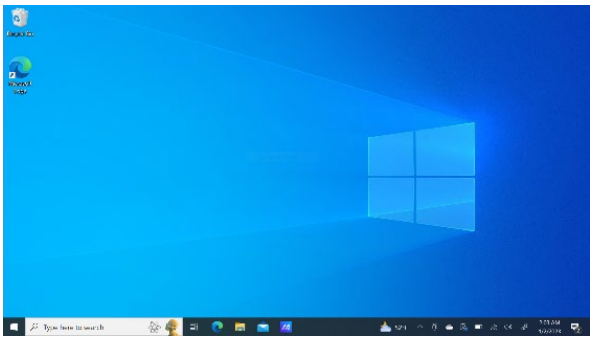
plurality of views. For example, the keyboard in the Zenbook Flip 13 (UX363) is operable in clamshell mode and inoperable in tent/stand/tablet mode:

First computer system configuration

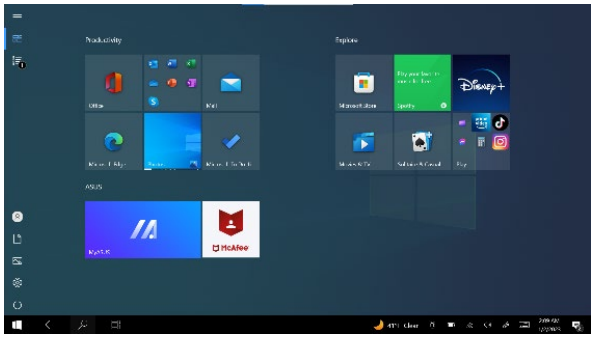
Second computer system configuration

NOTE: Rotating the screen to Stand, Tent and Tablet mode will disable the keyboard and touchpad.

See, e.g., Zenbook Flip 13 (UX363) User Manual, p. 47.



First view



Second view

Induced Infringement by ASGL and ASTP

223. Since at least the filing of this Complaint, ASGL and ASTP know of the ’715 patent and know that the Accused Products infringe at least claim 1 of the ’715 patent when sold or offered for sale by ASGL to ACI, when imported into the United States, when sold or offered for sale by ACI or by resellers such as Best Buy and Costco, and when used by customers or other users.

224. Since at least the filing of this Complaint, ASGL induces infringement of the ’715 patent by actively encouraging resellers to directly infringe at least claim 1 of the ’715 patent by selling the Accused Products to ACI, knowing that ACI sells the Accused Products to resellers such as Best Buy and Costco.

225. Since at least the filing of this Complaint, ASTP induces infringement of the ’715 patent by actively encouraging resellers to directly infringe at least claim 1 of the ’715 patent by financing ASGL’s purchase of the Accused Products.

ASUSTeK’s Knowledge of the ’715 Patent

226. Since at least the filing of this Complaint, ASUSTeK knows of the ’715 patent.

227. According to ASUSTeK’s 2021 Annual Report, ASUSTeK’s patent applications “are managed by dedicated personnel to ensure the quality of the patent application. Comprehensive management is built through the system to protect the Company’s important

intellectual property and avoid infringement by others." ASUSTeK 2021 Annual Report, pp. 160-161.

228. Given that ASUSTeK personnel are "dedicated" to "comprehensive management" of its patent applications, and given that by 2013 ASUSTeK had become aware of the '688 patent through ASUSTeK's prosecution of its own patent applications, on information and belief ASUSTeK would have investigated, become aware of, and considered LiTL's patents that relate to the '688 patent, including the '715 patent, before the filing of this Complaint.

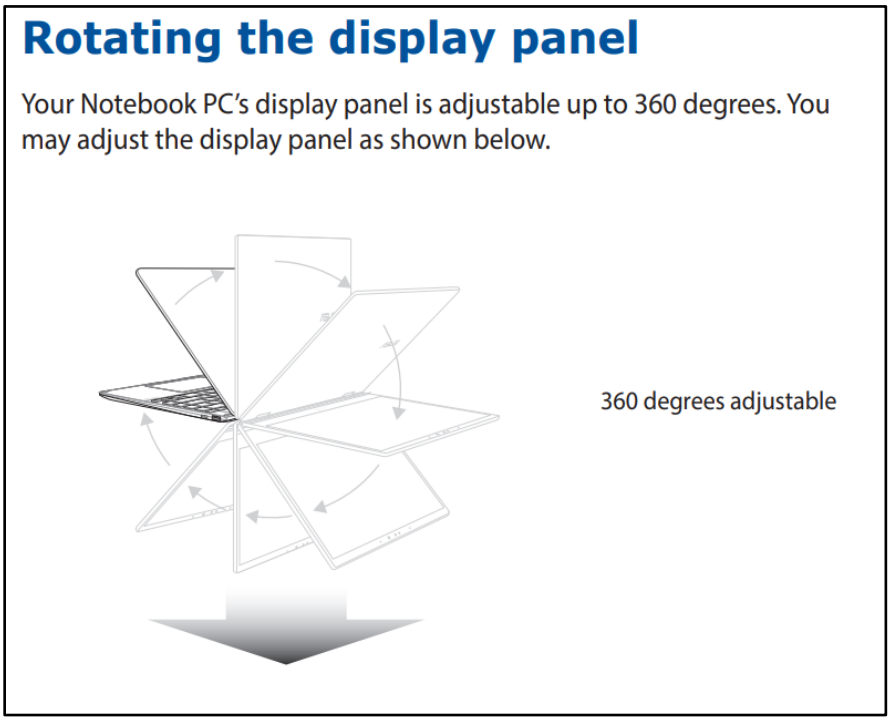
ASUSTeK's Induced Infringement

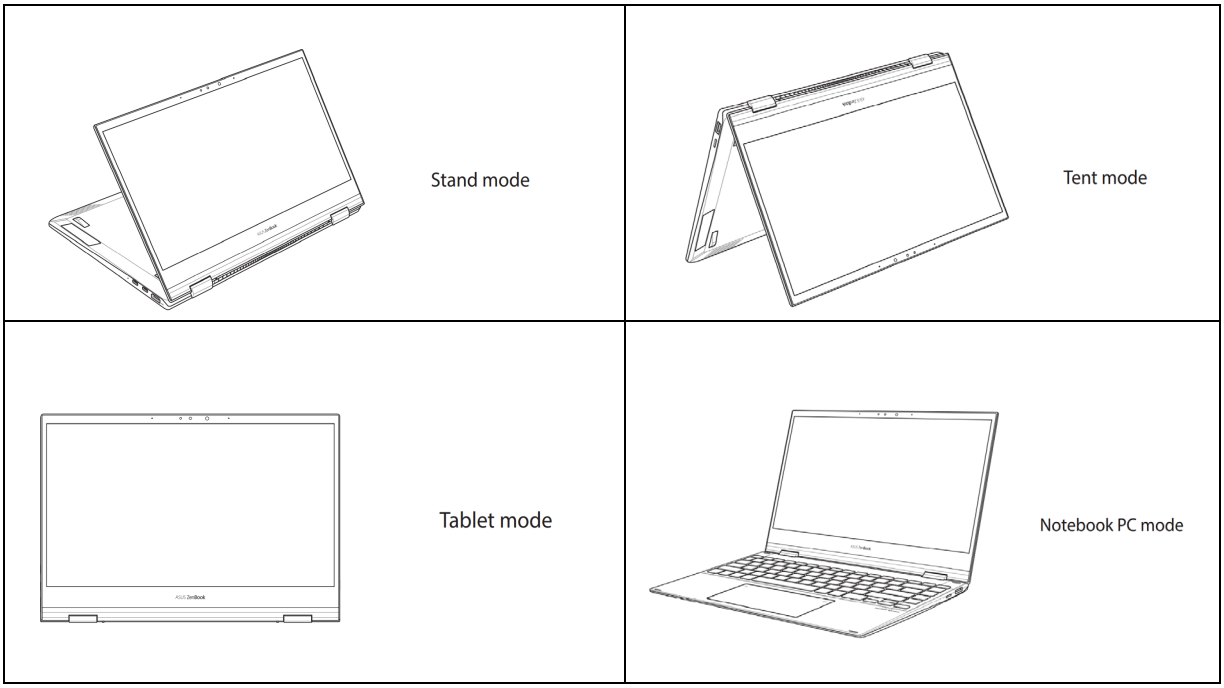
229. Since at least the filing of this Complaint, ASUSTeK knows that the Accused Products infringe at least claim 1 of the '715 patent when used by customers or other users, when sold by ASGL to ACI in the United States, when imported into the United States, and when sold or offered for sale by ACI or by resellers such as Best Buy and Costco.

230. Since at least the filing of this Complaint, ASUSTeK induces infringement of the '715 patent by actively encouraging ACI and resellers such Best Buy and Costco to directly infringe at least claim 1 of the '715 patent by developing the Accused Products, introducing the Accused Products into an established distribution channel, and actively encouraging downstream sales and offers for sale of the Accused Products.

231. Since at least the filing of this Complaint, ASUSTeK induces infringement of the '715 patent by actively encouraging customers or other users to directly infringe at least claim 1 of the '715 patent. ASUSTeK's website, https://www.asus.com/us/, provides 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. ASUSTeK's press release announcing the VivoBook Flip (TP501) touts its "360°-flippable 15.6-inch up to Full HD (1920 x 1080) touchscreen that allows users to flip seamlessly and instantly between laptop, tablet, and

other modes." https://press.asus.com/#/news/details?solo=98. As another example, the Zenbook Flip 13 (UX363) user manual available on ASUSTeK's website touts the device's four usage modes:





See, e.g., Zenbook Flip 13 (UX363) User Manual, pp. 46-47.

ASUSTeK's Willful Infringement

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

233. ASUSTeK claims to have intellectual property management policies "to protect the Company's important intellectual property and avoid infringement by others." ASUSTeK claims to regularly review and adjust these policies to "reduce legal risks." ASUSTeK 2021 Annual Report, pp. 160-161.

234. On information and belief, ASUSTeK has intellectual property management procedures to evaluate whether ASUS products have freedom to operate. *See* ASUSTeK 2021 Annual Report, pp. 160-161. Given these procedures, and given ASUSTeK's knowledge of the '688 patent and the related '715 patent since before the filing of the Complaint, if ASUSTeK did not investigate whether the Accused Products infringe the '715 patent, then ASUSTeK was willfully blind to a reasonable likelihood that the Accused Products infringe the '715 patent.

235. The foregoing description of ASUS'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.

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

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

COUNT VII

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

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

ASGL's Direct Infringement

239. ASGL 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 selling and offering for sale in the United States the Accused Products.

240. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include one non-transitory computer-readable storage medium storing processor-executable instructions that, when executed by at least one processor in a computer system comprising a display and a keyboard and being configurable between a plurality of computer system configurations, cause the at least one processor to perform a method. For example:

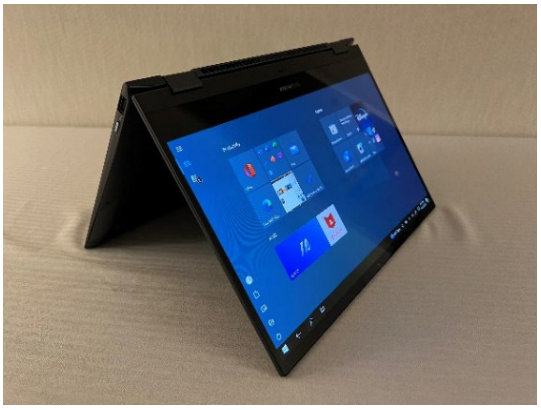
Processor	Intel® Core™ i7-1165G7 Processor 2.8 GHz (12M Cache, up to 4.7 GHz, 4 cores) Intel® Core™ i5-1135G7 Processor 2.4 GHz (8M Cache, up to 4.2 GHz, 4 cores)

Memory	8GB LPDDR4X on board, Memory Max Up to 8GB 16GB LPDDR4X on board, Memory Max Up to 32GB 8GB LPDDR4X on board Total system memory upgradeable to:8GB

Processor and Memory Specifications

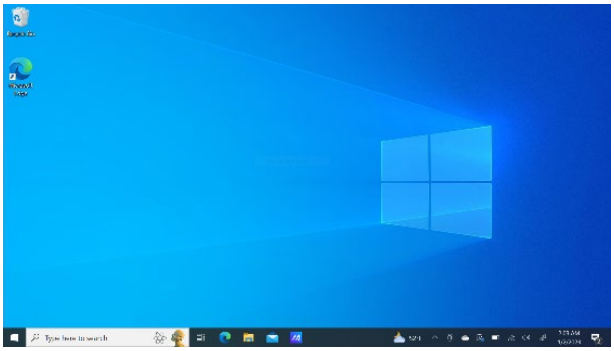
See, e.g., Zenbook Flip 13 (UX363) Specifications.

First computer system configuration

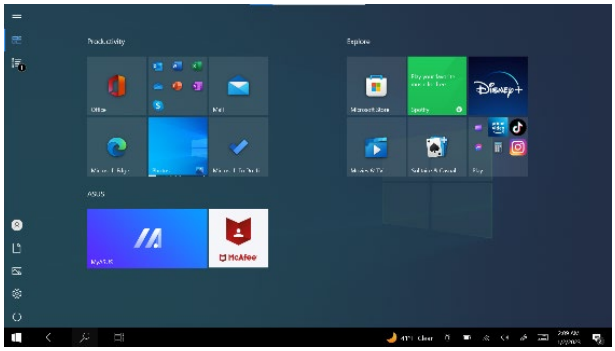


Second computer system configuration

241. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a processor to perform a method displaying a plurality of views of a plurality of visual representations of computer content. For example:



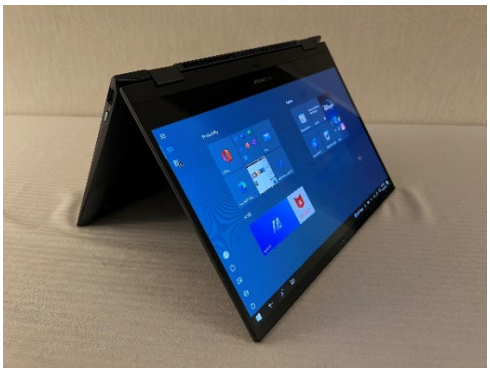
First view in a first configuration



Second view in a second configuration

242. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

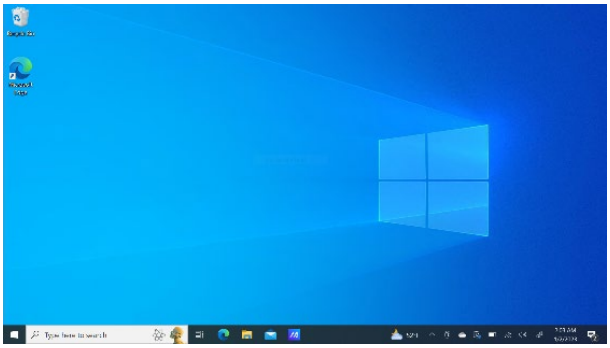


Second computer system configuration

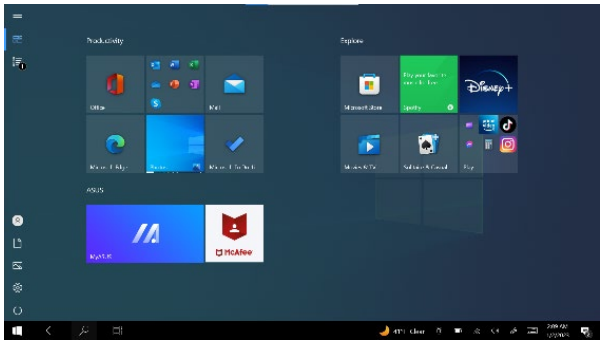
NOTE: Rotating the screen to Stand, Tent and Tablet mode will disable the keyboard and touchpad.

See, e.g., Zenbook Flip 13 (UX363) User Manual, p. 47.

243. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

Induced Infringement by ASGL and ASTP

244. Since at least the filing of this Complaint, ASGL and ASTP know of the ’818 patent and know that the Accused Products infringe at least claim 1 of the ’818 patent when sold or offered for sale by ASGL to ACI, when imported into the United States, when sold or offered

for sale by ACI or by resellers such as Best Buy and Costco, and when used by customers or other users.

245. Since at least the filing of this Complaint, ASGL induces infringement of the ’818 patent by actively encouraging resellers to directly infringe at least claim 1 of the ’818 patent by selling the Accused Products to ACI, knowing that ACI sells the Accused Products to resellers such as Best Buy and Costco.

246. Since at least the filing of this Complaint, ASTP induces infringement of the ’818 patent by actively encouraging resellers to directly infringe at least claim 1 of the ’818 patent by financing ASGL’s purchase of the Accused Products.

ASUSTeK’s Knowledge of the ’818 Patent

247. Since at least the filing of this Complaint, ASUSTeK knows of the ’818 patent.

248. According to ASUSTeK’s 2021 Annual Report, ASUSTeK’s patent applications “are managed by dedicated personnel to ensure the quality of the patent application. Comprehensive management is built through the system to protect the Company’s important intellectual property and avoid infringement by others.” ASUSTeK 2021 Annual Report, pp. 160-161.

249. Given that ASUSTeK personnel are “dedicated” to “comprehensive management” of its patent applications, and given that by 2013 ASUSTeK had become aware of the ’688 patent through ASUSTeK’s prosecution of its own patent applications, on information and belief ASUSTeK would have investigated, become aware of, and considered LiTL’s patents that relate to the ’688 patent, including the ’818 patent, before the filing of this Complaint.

ASUSTeK’s Induced Infringement

250. Since at least the filing of this Complaint, ASUSTeK knows that the Accused Products infringe at least claim 1 of the ’818 patent when used by customers or other users, when

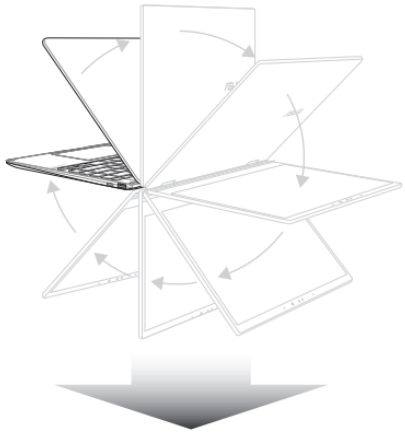
sold by ASGL to ACI in the United States, when imported into the United States, and when sold or offered for sale by ACI or by resellers such as Best Buy and Costco.

251. Since at least the filing of this Complaint, ASUSTeK induces infringement of the ’818 patent by actively encouraging ACI and resellers such Best Buy and Costco to directly infringe at least claim 1 of the ’818 patent by developing the Accused Products, introducing the Accused Products into an established distribution channel, and actively encouraging downstream sales and offers for sale of the Accused Products.

252. Since at least the filing of this Complaint, ASUSTeK induces infringement of the ’818 patent by actively encouraging customers or other users to directly infringe at least claim 1 of the ’818 patent. ASUSTeK’s website, https://www.asus.com/us/, provides 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. ASUSTeK’s press release announcing the VivoBook Flip (TP501) touts its “360°-flippable 15.6-inch up to Full HD (1920 x 1080) touchscreen that allows users to flip seamlessly and instantly between laptop, tablet, and other modes.” https://press.asus.com/#/news/details?solo=98. As another example, the Zenbook Flip 13 (UX363) user manual available on ASUSTeK’s website touts the device’s four usage modes:

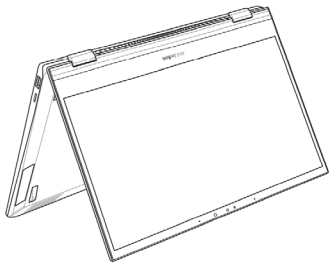
Rotating the display panel

Your Notebook PC's display panel is adjustable up to 360 degrees. You may adjust the display panel as shown below.

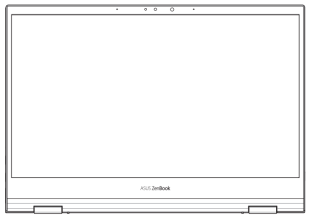


360 degrees adjustable

Stand mode



Tent mode



Tablet mode

Notebook PC mode

See, e.g., Zenbook Flip 13 (UX363) User Manual, pp. 46-47.

ASUSTeK's Willful Infringement

253. ASUSTeK is willfully infringing at least claim 1 of the '818 patent. ASUSTeK's offers for sale, sales, and promotion of the Accused Products with provision of

manuals and instruction to purchasers that encourage use that ASUSTeK knows will infringe the ’818 patent demonstrates the willful nature of ASUSTeK’s infringement.

254. ASUSTeK claims to have intellectual property management policies “to protect the Company’s important intellectual property and avoid infringement by others.” ASUSTeK claims to regularly review and adjust these policies to “reduce legal risks.” ASUSTeK 2021 Annual Report, pp. 160-161.

255. On information and belief, ASUSTeK has intellectual property management procedures to evaluate whether ASUS products have freedom to operate. *See* ASUSTeK 2021 Annual Report, pp. 160-161. Given these procedures, and given ASUSTeK’s knowledge of the ’688 patent and the related ’818 patent since before the filing of the Complaint, if ASUSTeK did not investigate whether the Accused Products infringe the ’818 patent, then ASUSTeK was willfully blind to a reasonable likelihood that the Accused Products infringe the ’818 patent.

256. The foregoing description of ASUS’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.

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

258. ASUS’s infringement of the ’818 patent has damaged and continues to damage LiTL in an amount yet to be determined, of at least a reasonable royalty.

COUNT VIII

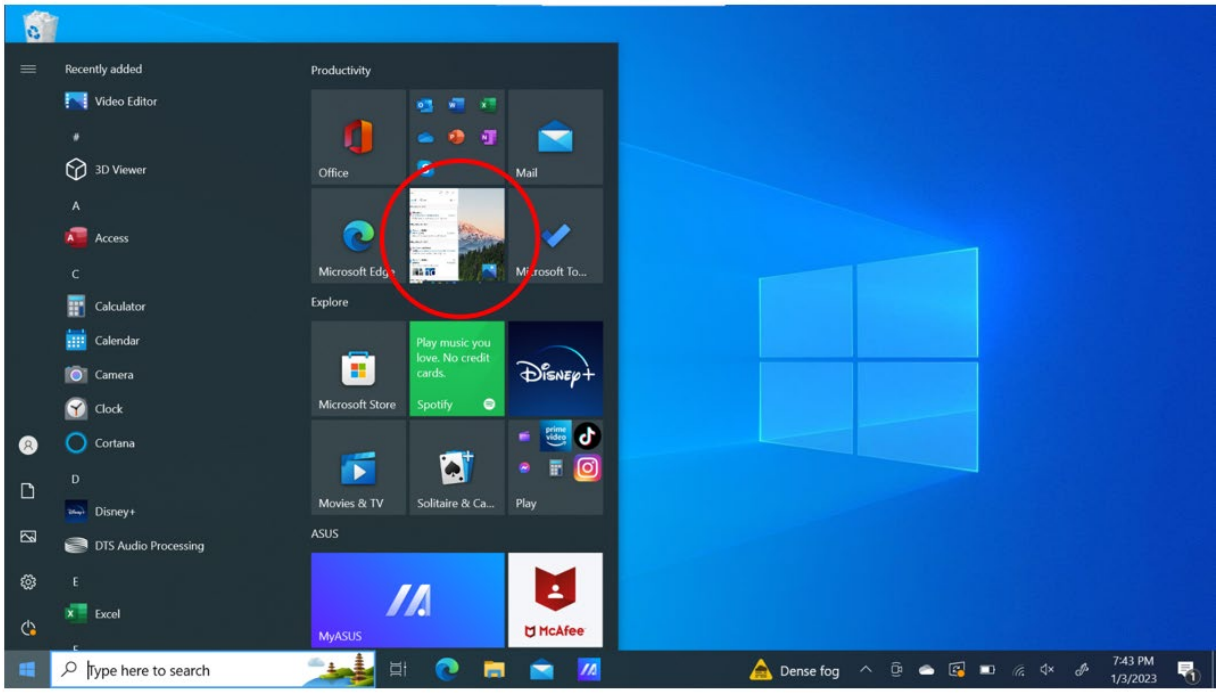
(Infringement of U.S. Patent No. 8,612,888)

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

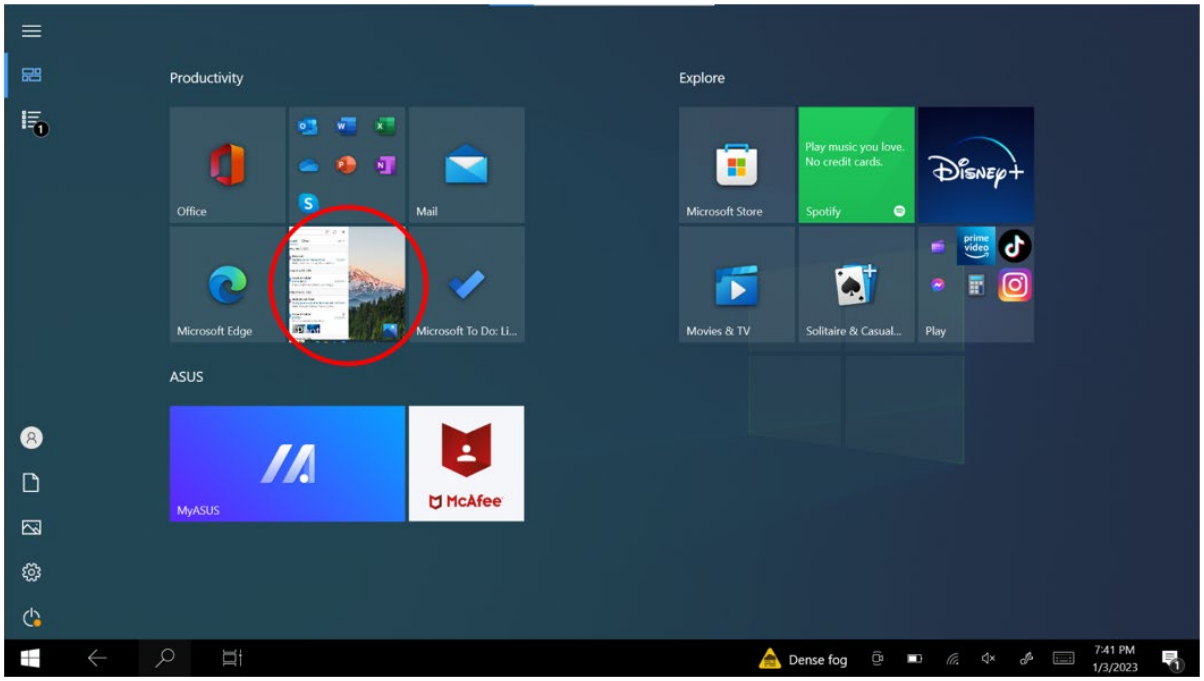
ASGL's Direct Infringement

260. ASGL 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 selling and offering for sale in the United States the Accused Products.

261. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a system for accessing and managing digital media libraries with a plurality of selectable I/O profiles. For example, the Zenbook Flip 13 (UX363) includes the Microsoft Photos app, which can be accessed in a first and second view:

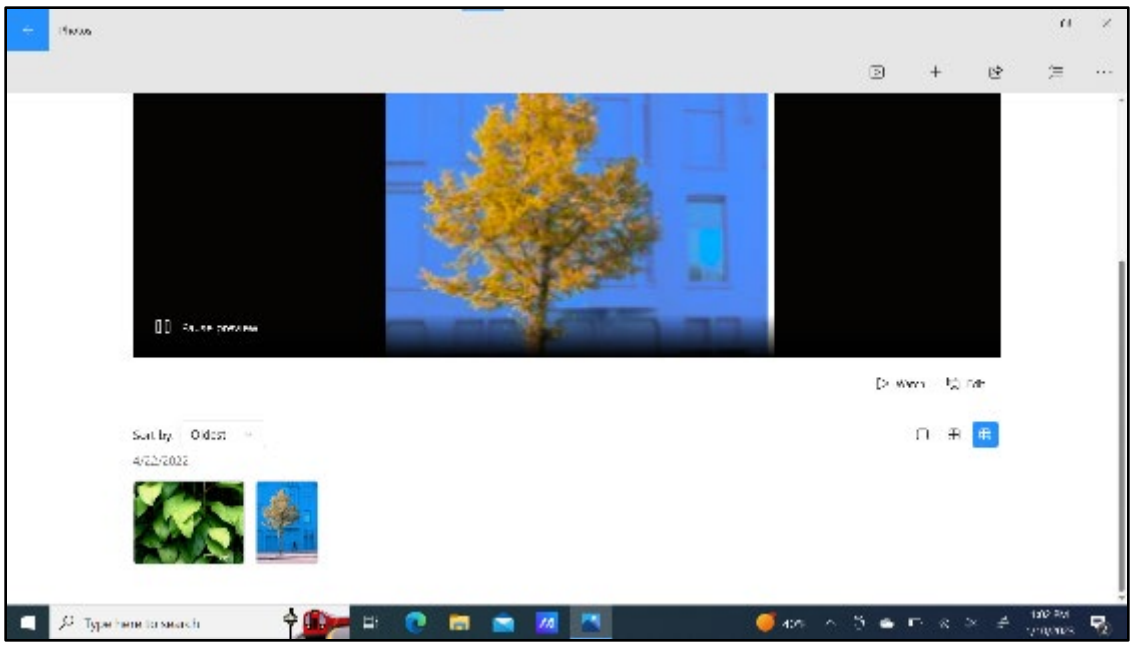


Microsoft Photos in a first I/O profile

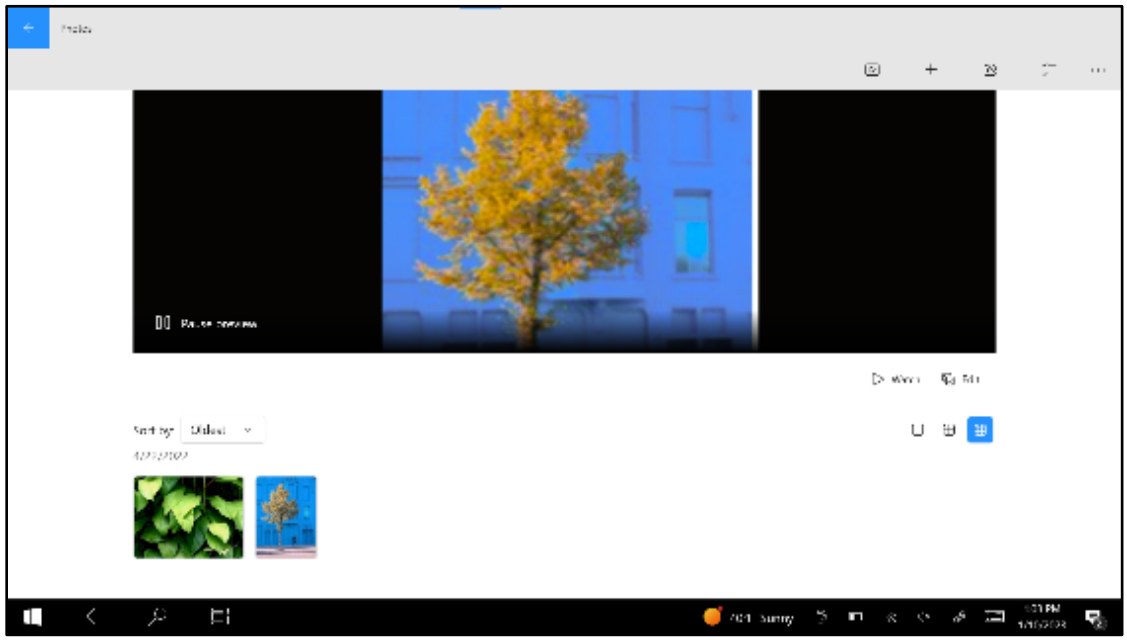


Microsoft Photo in a second I/O profile

262. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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 Zenbook Flip 13 (UX363) 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:



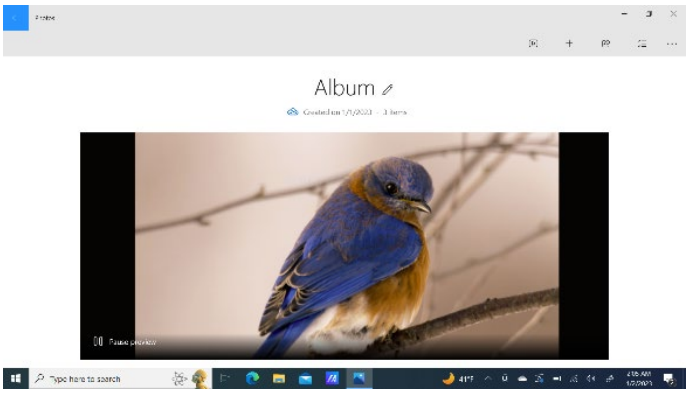
Microsoft Photos app in a first I/O profile with a first view



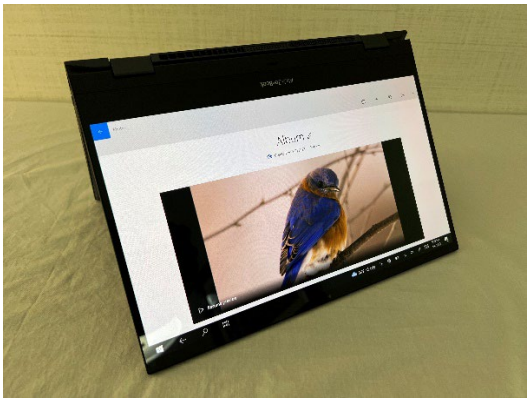
Microsoft Photos app in a second I/O profile with a second view

263. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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 Zenbook Flip 13 (UX363) is configured to transition between a plurality of views in response to selection of laptop and tablet modes:

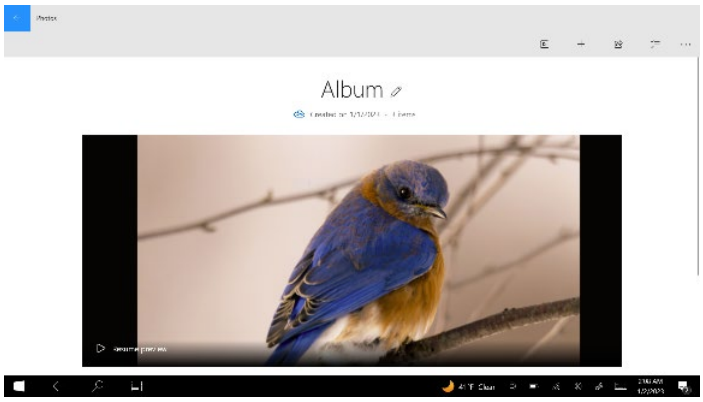
First physical configuration



First I/O profile with a first view



Second physical configuration



Second I/O profile with a second view

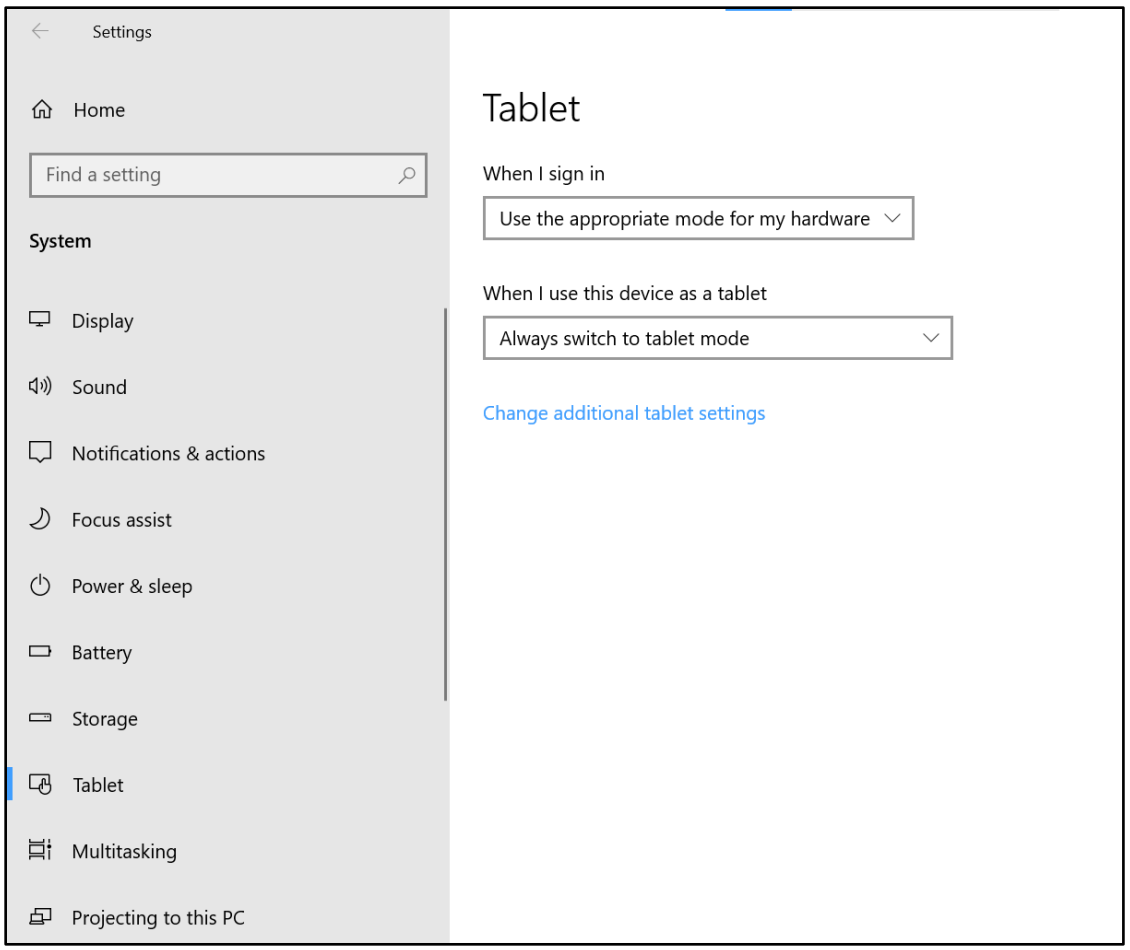
264. Selecting the I/O profile within the Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) includes responding to user rotation of a display component of the computing device about a longitudinal axis running along an interface between the display component and a base of the streamlined computing 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 Zenbook Flip 13

(UX363) can display a laptop mode when rotated from a closed mode to a notebook mode, and can further display a tablet mode when rotated from a notebook mode to a easel mode.

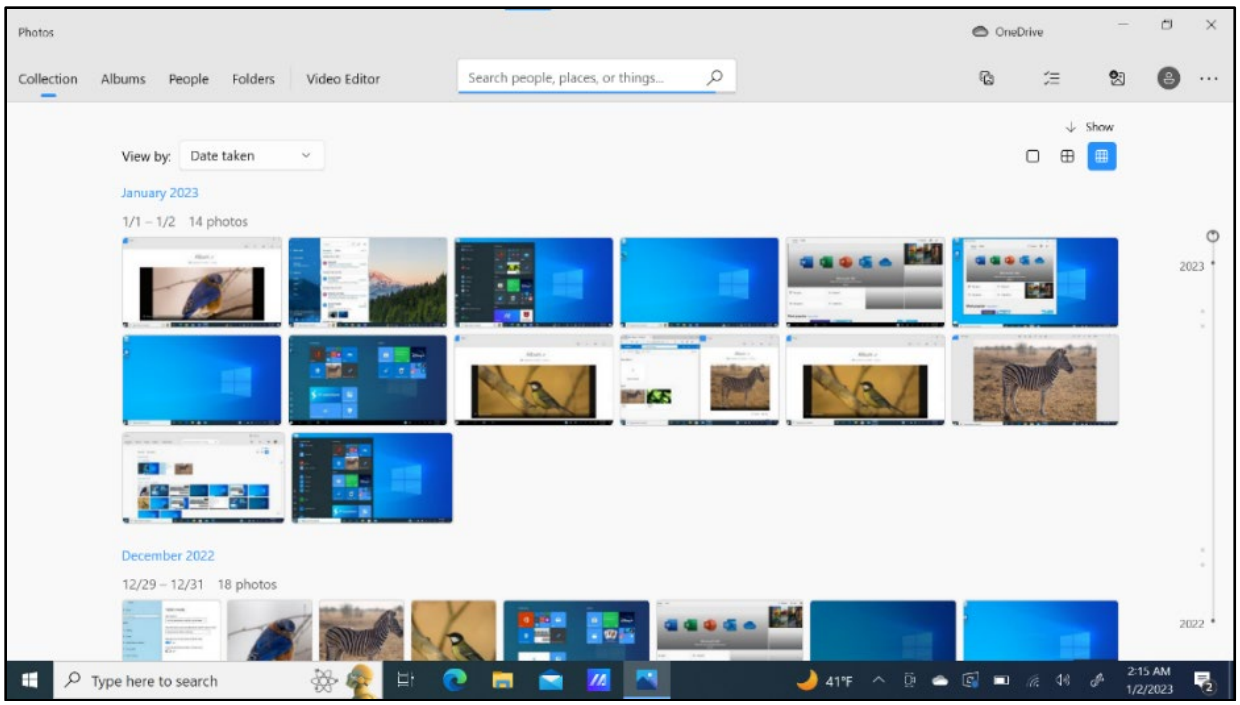
First physical configuration with a first view

Second physical configuration with a second view

265. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a view selector component configured to transition between the plurality of views in response to activation. For example:

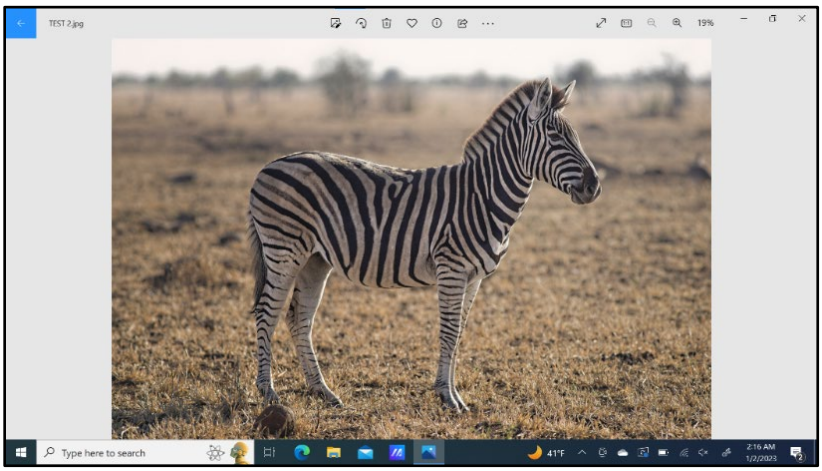


266. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) include a storage component configured to store an association between at least one of a plurality of visual representations and digital media content. For example, the Zenbook Flip 13 (UX363) includes the Microsoft Photos app, which is configured to store an association between thumbnail previews of content and digital media content:



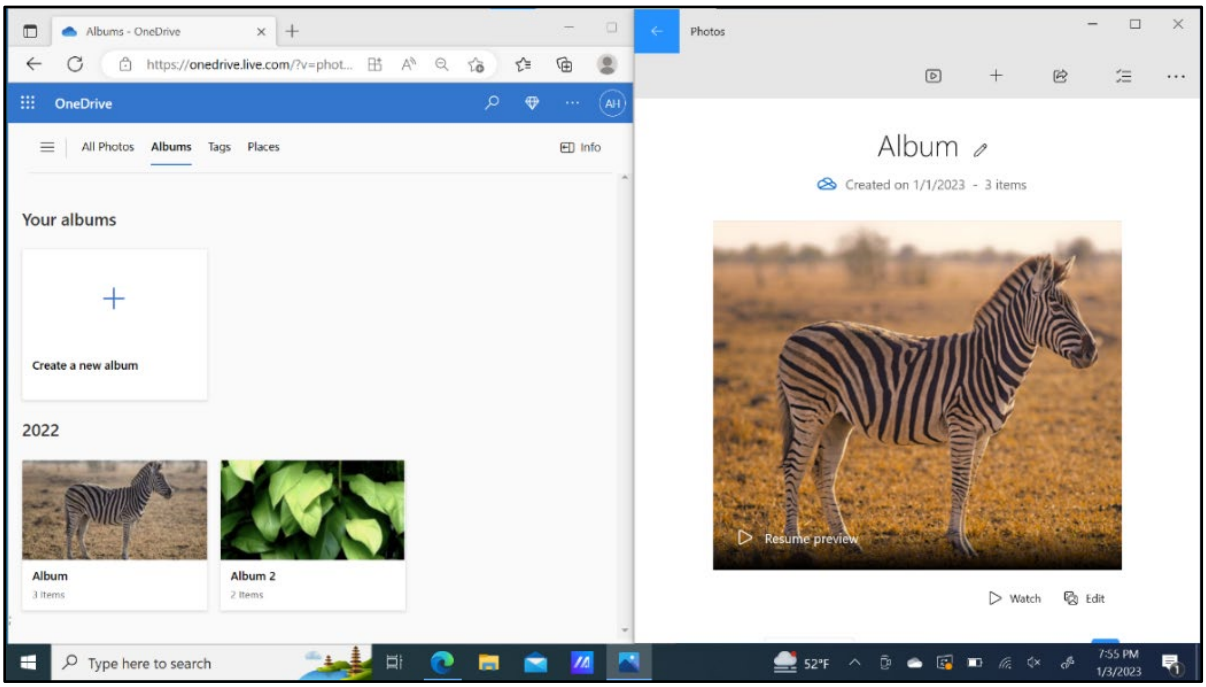
Microsoft Photos app

267. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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

268. The Accused Products (*e.g.*, the Zenbook Flip 13 (UX363)) 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 Zenbook Flip 13 (UX363) includes the Microsoft Photos app, which is configured to permit users to manage digital media content libraries (*e.g.*, in an album located locally or in a remote location such as OneDrive):



OneDrive album and Microsoft Photos app

Induced Infringement by ASGL and ASTP

269. Since at least the filing of this Complaint, ASGL and ASTP know of the ’888 patent and know that the Accused Products infringe at least claim 27 of the ’888 patent when sold or offered for sale by ASGL to ACI, when imported into the United States, when sold or offered for sale by ACI or by resellers such as Best Buy and Costco, and when used by customers or other users.

270. Since at least the filing of this Complaint, ASGL induces infringement of the ’888 patent by actively encouraging resellers to directly infringe at least claim 27 of the ’888 patent by selling the Accused Products to ACI, knowing that ACI sells the Accused Products to resellers such as Best Buy and Costco.

271. Since at least the filing of this Complaint, ASTP induces infringement of the ’888 patent by actively encouraging resellers to directly infringe at least claim 27 of the ’888 patent by financing ASGL’s purchase of the Accused Products.

ASUSTeK’s Knowledge of the ’888 Patent

272. Since at least the filing of this Complaint, ASUSTeK knows of the ’888 patent.

273. According to ASUSTeK’s 2021 Annual Report, ASUSTeK’s patent applications “are managed by dedicated personnel to ensure the quality of the patent application. Comprehensive management is built through the system to protect the Company’s important intellectual property and avoid infringement by others.” ASUSTeK 2021 Annual Report, pp. 160-161.

274. Given that ASUSTeK personnel are “dedicated” to “comprehensive management” of its patent applications, and given that by 2013 ASUSTeK had become aware of the ’688 patent through ASUSTeK’s prosecution of its own patent applications, on information and belief ASUSTeK would have investigated, become aware of, and considered LiTL’s patents that relate to the ’688 patent, including the ’888 patent, before the filing of this Complaint.

ASUSTeK’s Induced Infringement

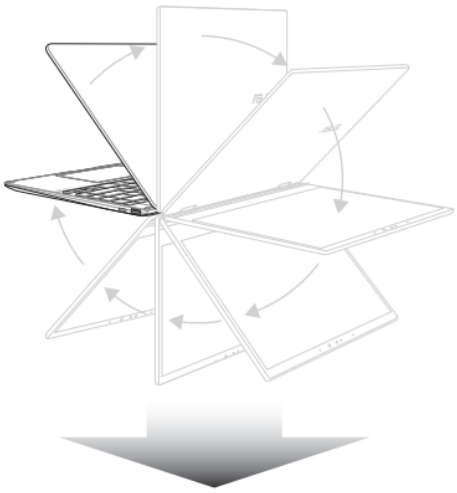
275. Since at least the filing of this Complaint, ASUSTeK knows that the Accused Products infringe at least claim 27 of the ’888 patent when used by customers or other users, when sold by ASGL to ACI in the United States, when imported into the United States, and when sold or offered for sale by ACI or by resellers such as Best Buy and Costco.

276. Since at least the filing of this Complaint, ASUSTeK induces infringement of the ’888 patent by actively encouraging ACI and resellers such Best Buy and Costco to directly infringe at least claim 27 of the ’888 patent by developing the Accused Products, introducing the Accused Products into an established distribution channel, and actively encouraging downstream sales and offers for sale of the Accused Products.

277. Since at least the filing of this Complaint, ASUSTeK induces infringement of the ’888 patent by actively encouraging customers or other users to directly infringe at least claim 27 of the ’888 patent. ASUSTeK’s website, https://www.asus.com/us/, provides 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. ASUSTeK’s press release announcing the VivoBook Flip (TP501) touts its “360°-flippable 15.6-inch up to Full HD (1920 x 1080) touchscreen that allows users to flip seamlessly and instantly between laptop, tablet, and other modes.” https://press.asus.com/#/news/details?solo=98. As another example, the Zenbook Flip 13 (UX363) user manual available on ASUSTeK’s website touts the device’s four usage modes:

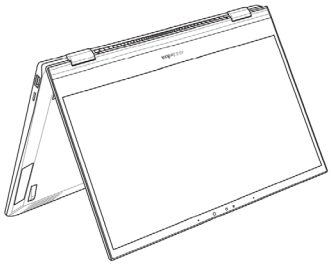
Rotating the display panel

Your Notebook PC's display panel is adjustable up to 360 degrees. You may adjust the display panel as shown below.

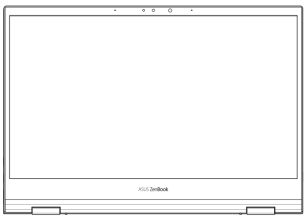


360 degrees adjustable

Stand mode



Tent mode



Tablet mode

Notebook PC mode

See, e.g., Zenbook Flip 13 (UX363) User Manual, pp. 46-47.

ASUSTeK's Willful Infringement

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

279. ASUSTeK claims to have intellectual property management policies "to protect the Company's important intellectual property and avoid infringement by others." ASUSTeK claims to regularly review and adjust these policies to "reduce legal risks." ASUSTeK 2021 Annual Report, pp. 160-161.

280. On information and belief, ASUSTeK has intellectual property management procedures to evaluate whether ASUS products have freedom to operate. *See* ASUSTeK 2021 Annual Report, pp. 160-161. Given these procedures, and given ASUSTeK's knowledge of the '688 patent and the related '888 patent since before the filing of the Complaint, if ASUSTeK did not investigate whether the Accused Products infringe the '888 patent, then ASUSTeK was willfully blind to a reasonable likelihood that the Accused Products infringe the '888 patent.

281. The foregoing description of ASUS'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.

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

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

REQUEST FOR RELIEF

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

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

b. Granting a permanent injunction, enjoining ASUS 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 ASUS’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 ASUSTeK’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 ASUSTeK’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

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