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Attorneys for Plaintiffs
Lian Li Industrial Co., Ltd. and
Chen, Chien-Hao

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LIAN LI INDUSTRIAL CO., LTD. and
CHEN, CHIEN-HAO,

Plaintiffs,

v.

THERMALTAKE TECHNOLOGY
CO., LTD. and
THERMALTAKE INC. (a.k.a.
THERMALTAKE USA),

Defendants.

Civil Action No. 2:23-cv-07470

**COMPLAINT FOR PATENT
INFRINGEMENT**

Demand for Jury Trial

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Lian Li Industrial Co., Ltd. (“Lian Li”) and Chen, Chien-Hao (“Chen”) (collectively Plaintiffs”) file this Complaint for Patent Infringement of U.S. Patent No. 10,690,336 B1 (“’336 patent”) against Thermaltake Technology Co., Ltd. and Thermaltake Inc. (collectively “Thermaltake” or “Defendants”) and state as follows:

THE PARTIES

1. Plaintiff Lian Li is a corporation organized under the laws of Taiwan (R.O.C.) with a principal place of business located at No. 11-1, Gongjian N. Rd., Liudu Vil., Qidu Dist., Keelung City 206007, Taiwan (R.O.C.). Founded in 1983, Lian Li is a leading supplier of computer components used by gamers and other enthusiasts around the world, and remains one of the major manufacturers of premium computer cases and accessories in the international market. Constructed with either brushed or anodized aluminum, Lian Li’s award-winning computer cases are sturdy, lightweight, and loaded with designer features loved by gamers and other enthusiasts all over the globe. In addition to its various computer cases, Lian Li also produces other accessories such as CPU coolers, fans, power supplies, removable hard drive bays, memory card readers, and computer desks. The company also provides original equipment manufacturer (OEM) and original design manufacturer (ODM) services. Lian Li has an exclusive license to the ’336 patent, including the exclusive right to sue for infringement thereof.

2. Plaintiff Chen is an individual who resides in Taiwan (R.O.C.) and serves as the Chief Executive Officer (CEO) of Lian Li, and is the inventor and the original owner of the ’336 patent.

3. On information and belief, defendant Thermaltake Technology Co., Ltd. is a corporation organized under the laws of Taiwan (R.O.C.) with a principal of business located at 5F, No. 185, Tiding Blvd., Sec. 2, Taipei City 11493, Taiwan (R.O.C.).

4. On information and belief, defendant Thermaltake Inc. (a.k.a. Thermaltake USA) is a corporation organized under the laws of California with a principal of business located at 20420 Business Parkway, City of Industry, CA 91789.

THE PATENT-IN-SUIT

5. The '336 patent, titled "Illumination Fan Connectable With At Least One Illumination Fan For A Computer," was duly and legally issued on June 23, 2020. A true and correct copy of the '336 patent has been attached hereto as Exhibit A.

6. The '336 patent describes and claims a novel illumination fan for use with a computer to provide improved heat dissipation in a simpler and lower cost structure. In one embodiment as shown in Figure 2 below, the patent discloses an illumination fan connectable with at least one other illumination fan:

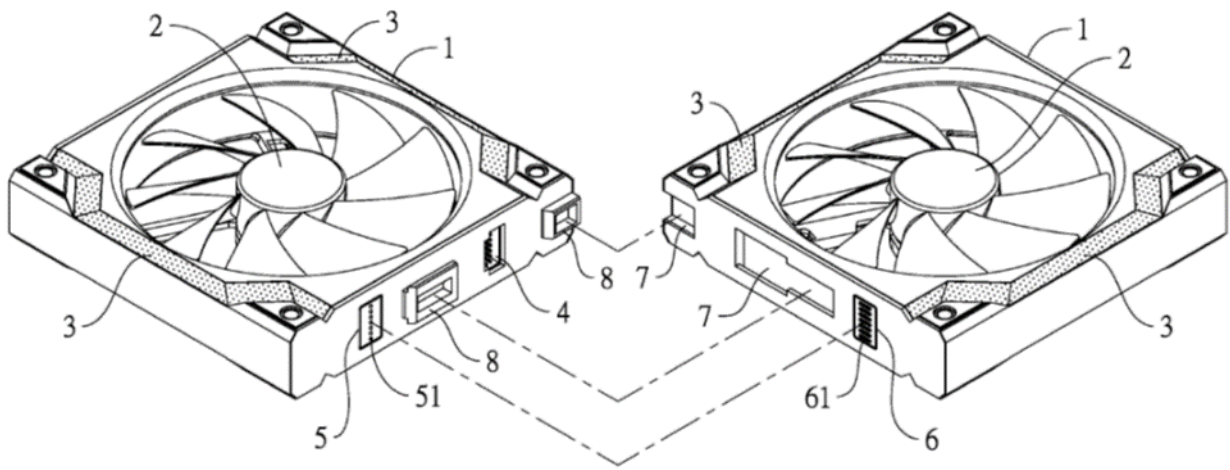


Fig. 2

7. Figure 2 above shows an embodiment of an illumination fan connectable with at least one other illumination fan that includes a body 1, a fan 2 disposed in the center of the body 1, an illumination area 3 disposed on two sides of the fan at the top of the body 1, a power socket 4 and a first connector 5 disposed on one side of the body 1, and a second connector 6 disposed on another side of the body 1. The power socket 4 is electrically connected with the first connector 5, the second connector 6, the fan 2, and the illumination area 3. ('336, Fig. 2, 2:61-22.) Claim 1 of the '336 patent recites:

An illumination fan connectable with at least one illumination fan for a computer, comprising: a body, provided with a fan in center of the body, an illumination area on at least two sides of the fan at top of the body, a power socket and a first connector on one side of the body, and a second connector on another side of the body, wherein the power socket is electrically connected

1 with the first connector, the second connector, the fan and the illumination
2 area, such that when the power socket on the one side of the body is supplied
3 with power, the fan and the illumination area of the body are respectively
4 driven into rotation and illumination, and when the first connector of the body
5 is connected with a second connector of a body of another illumination fan, a
6 fan and an illumination area of the body of another illumination fan are
7 respectively driven into rotation and illumination.

8 JURISDICTION AND VENUE

9 8. This action arises under the patent laws of the United States, Title 35 of the
10 United States Code. Accordingly, this Court has exclusive subject matter jurisdiction over
11 this action under 28 U.S.C. §§ 1331 and 1338(a).

12 9. Plaintiff Lian Li is the exclusive licensee of the '336 patent with all substantial
13 rights, including the exclusive right to sue for any past, present, or future infringement, and
14 therefore has standing to sue Thermaltake. Plaintiff Chen is the inventor and the original
15 owner of the '336 patent.

16 10. Venue is proper in this District because defendant Thermaltake Technology
17 Co., Ltd. is a foreign corporation and thus may be sued in this District under 28 U.S.C. §
18 1391(c)(3). Defendant Thermaltake Inc. resides in this District and thus may be sued in this
19 District under 28 U.S.C. §1400(b).

20 11. This Court has personal jurisdiction over Thermaltake because, on information
21 and belief, Thermaltake has been conducting business and committing acts of infringement
22 within this State (and in this District). Thermaltake has also been purposefully and
23 voluntarily selling one or more of the infringing products, knowing that they will be
24 purchased and used by customers in this State (and in this District). Thus, Thermaltake has,
25 on information and belief, (i) availed itself of the rights and benefits of this State (and of
26 this District), (ii) transacted, conducted, and/or solicited business and engaged in a
27 persistent course of conduct in this State (and in this District), (iii) derived substantial
28 revenue from the sales and/or use of the infringing products in this State (and in this
District), (iv) purposefully directed activities (directly and/or through intermediaries), such
as shipping, distributing, offering for sale, selling, and/or advertising the infringing

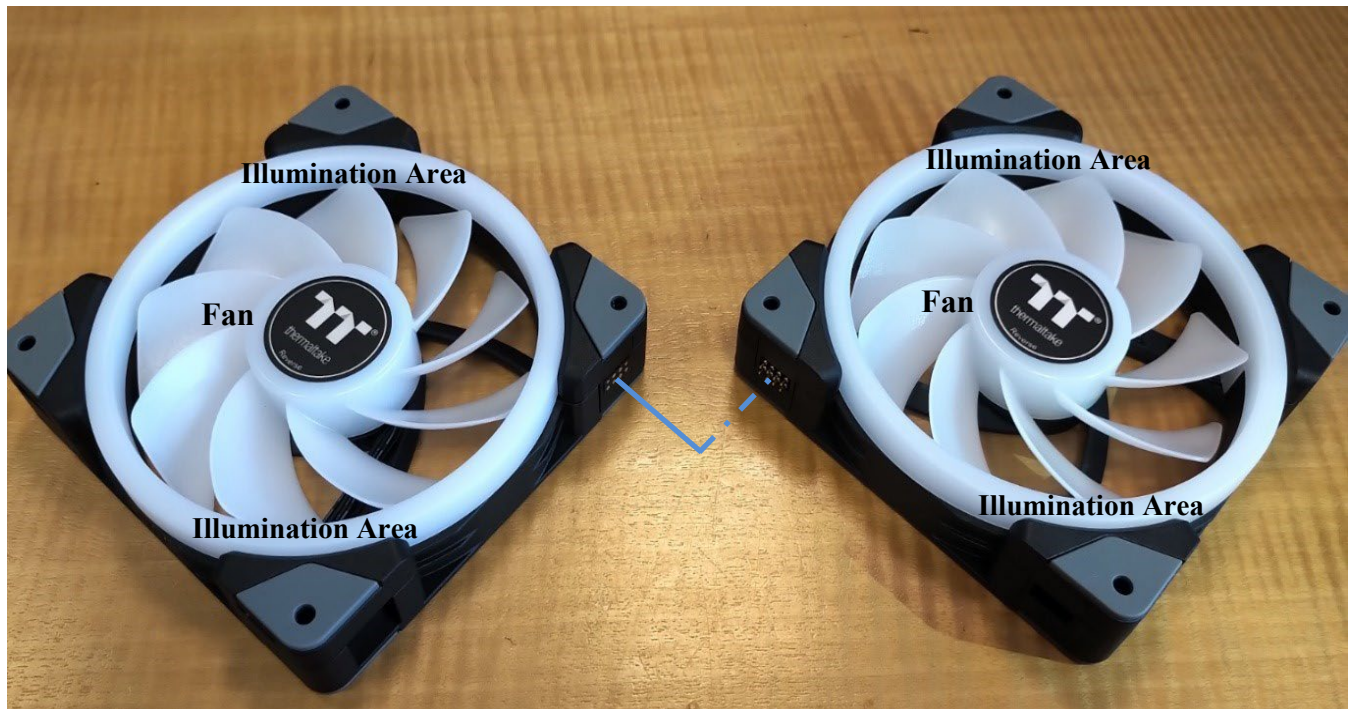
products, at residents of this State (and of this District), (v) delivered the infringing products into the stream of commerce knowing that they will be used and/or purchased by customers in this State (and in this District), and (vi) committed acts of patent infringement in this State (and in this District).

12. This Court has personal jurisdiction over defendant Thermaltake Inc. because it resides within this State (and in this District).

PATENT INFRINGEMENT

13. Plaintiffs incorporate by reference the paragraphs above as if fully set forth herein.

14. Thermaltake infringes the '336 patent under 35 U.S.C. § 271 by making, using, selling, and/or offering to sell in, and/or importing into, the United States computer cooling fans that satisfy each limitation of at least claim 1 of the '336 patent. As a non-limiting example, Thermaltake's Swafan EX 12 RGB PC Cooling Fan ("Swafan") meets each limitation of at least claim 1. An annotated picture of the Swafan is shown below:



15. As shown, the Swafan includes an illumination fan connectable with at least one other illumination fan for a computer. The illumination fan comprises a body, provided

with a fan in the center of the body, an illumination area on at least two sides of the fan at the top of the body, a power socket and a first connector on one side of the body, and a second connector on another side of the body. The power socket is electrically connected with the first connector, the second connector, the fan, and the illumination area, such that when the power socket on the one side of the body is supplied with power, the fan and the illumination area of the body are respectively driven into rotation and illumination, and when the first connector of the body is connected with a second connector of a body of another illumination fan, a fan and an illumination area of the body of another illumination fan are respectively driven into rotation and illumination. For example, the following annotated image of the Swafan exemplarily shows the claimed power socket and connectors that are electrically connected (as indicated by the arrow annotations below):



16. The discussion above provides an exemplary explanation of how at least Thermaltake's Swafan meets each limitation of at least claim 1 of the '336 patent.

17. Thermaltake therefore has committed and continues to commit acts of infringement of the '336 patent under 35 U.S.C. § 271, by making, using, selling, and/or offering for sale in, or importing into, the United States products that infringe at least claim 1 of the '336 patent. Thermaltake has also been on notice of the '336 patent and its

1 infringement since at least April 2023, when Thermaltake received a letter identifying
2 the '336 patent and providing allegations of infringement. Thermaltake's infringement
3 therefore has been, and continues to be, willful thus rendering this an exceptional case.

4 **DEMAND FOR JURY TRIAL**

5 18. Plaintiffs hereby request a trial by jury under Rule 38(b) of the Federal Rules
6 of Civil Procedure on all issues triable by jury.

7 **PRAYER FOR RELIEF**

8 19. Plaintiffs respectfully request that the Court find in its favor and against
9 Thermaltake and that the Court grant Plaintiffs the following relief:

- 10 a. A judgment that Thermaltake has infringed the '336 patent as alleged herein;
- 11 b. A permanent injunction against Thermaltake and its affiliates, subsidiaries,
- 12 assignees, employees, agents, and/or anyone acting in privity or concert with
- 13 them from further infringing the '336 patent, including without limitation
- 14 enjoining the inducement of others to make, use, sell, or offer for sale
- 15 products that infringe any claim of the '336 patent without a license from
- 16 Plaintiffs, until the expiration of the '336 patent;
- 17 c. A judgment for an accounting of all damages, past and future, sustained by
- 18 Plaintiff as a result of the acts of infringement by Thermaltake;
- 19 d. A judgment and order requiring Thermaltake to pay Plaintiffs damages under
- 20 35 U.S.C. § 284, including up to treble damages as provided by 35 U.S.C. §
- 21 284, and any lost profits and/or royalties determined to be appropriate;
- 22 e. A judgment and order requiring Thermaltake to pay Plaintiff pre-judgment
- 23 and post-judgment interest on the damages awarded;
- 24 f. A judgment and order finding this case to be exceptional and requiring
- 25 Thermaltake to pay the costs of this action (including all disbursements) and
- 26 attorneys' fees as provided by 35 U.S.C. § 285; and
- 27 g. Such other and further relief as the Court deems just and equitable.
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1 DATED: September 8, 2023

Respectfully submitted,

3 /s/ Kyle D. Chen

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