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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.

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Case No.: 2:23-cv-07470 HDV (MARx)

**DISCLOSURE OF ASSERTED
CLAIMS AND INFRINGEMENT
CONTENTIONS**

Action Filed: September 8, 2023

1 Based on the information presently available, plaintiffs Lian Li Industrial Co., Ltd.
2 and Chen, Chien-Hao (collectively “Plaintiffs” or “Lian Li”) hereby disclose the asserted
3 claims and infringement contentions to defendants Thermaltake Technology Co., Ltd. and
4 Thermaltake Inc. (a.k.a. Thermaltake USA) (collectively “Defendants” or “Thermaltake”) in
5 accordance with the Minutes of Scheduling Conference and Order Setting Pretrial and
6 Trial Schedule entered on February 28, 2024 (Dkt. No. 37). Lian Li reserves the right to
7 modify, amend, or supplement the disclosure as provided by the Civil Local Rules, the
8 Federal Rules of Civil Procedure, and any other applicable rules and orders by this Court.

9 **I. ASSERTED CLAIMS**

10 Thermaltake infringes claims 1-3 and 5 (“Asserted Claims”) of U.S. Patent No.
11 10,690,336 (the “’336 patent”) under 35 U.S.C. § 271.

12 **II. ACCUSED INSTRUMENTALITIES**

13 Lian Li incorporates by references its Complaint (Dkt. No. 1). The Accused
14 Instrumentalities include Thermaltake’s Swafan and any fans no more than colorably
15 different, including without limitation the SWAFAN EX12 and EX14 series of fans (*e.g.*,
16 CL-F167-PL12SW-A, CL-F168-PL14SW-A, CL-F169-PL12SW-A, CL-F170-PL14SW-
17 A, CL-F183-PL12BU-A, and CL-F184-PL14BU-A, etc.) (“Accused Instrumentalities”).

18 **III. CLAIM CHART**

19 Lian Li incorporates by references its Complaint (Dkt. No. 1). Thermaltake infringes
20 the Asserted Claims as shown in the attached infringement claim chart for the ’336 patent
21 (“Infringement Claim Chart”).

22 Lian Li expects discovery to show infringement of the Asserted Claims in more detail
23 and/or additional infringement by Thermaltake.

24 Based on information obtained to date, Lian Li contends that each limitation of each
25 Asserted Claim has been infringed literally as shown in the Infringement Claim Chart. Lian
26 Li further contends that certain limitations of the Asserted Claims are infringed under the
27 doctrine of equivalents as shown in the Infringement Claim Chart.

1 With respect to any claim element or limitation that may be found not to be literally
2 embodied in or performed by an Accused Instrumentality, Lian Li also contends in the
3 alternative that the Accused Instrumentality embodies or otherwise meets the limitation
4 under the Doctrine of Equivalents and that the element or limitation not found to be literally
5 met is equivalently met because any difference between the claim element or limitation and
6 the Accused Instrumentality is insubstantial. Accordingly, Lian Li contends that any
7 asserted claim limitation that the Accused Instrumentalities are found not to embody
8 literally is nevertheless embodied by the Accused Instrumentalities under an operative test
9 for equivalence (*e.g.*, the function, way, result, or insubstantial differences test).

10 Lian Li reserves the right to supplement these contentions.

11 **IV. INDIRECT INFRINGEMENT**

12 Lian Li incorporates by references its Complaint (Dkt. No. 1).

13 As described above (in section III), the Asserted Claims are directly infringed by the
14 Accused Instrumentalities. Thermaltake induces direct infringement by the resellers,
15 customers, and/or users of the Accused Instrumentalities in the United States, while
16 knowing that such sale and/or use infringes the Asserted Claims. Thermaltake contributes
17 to infringement by the resellers, customers, and/or users of computer cooling systems
18 incorporating the Accused Instrumentalities in the United States.

19 **V. PRIORITY DATE**

20 The Asserted Claims are entitled to a priority date of December 26, 2018.

21 **VI. PRACTICING PRODUCTS**

22 One or more of the Asserted Claims are practiced by one or more of Lian Li's UNI
23 FAN products.

24 **VII. FIRST INFRINGEMENT**

25 Thermaltake's infringement of the Asserted Claims began with its first use, offer for
26 sale, and/or sale of one or more of the Accused Instrumentalities in the United States in or
27 before March 2023. Lian Li's representatives observed YouTube videos showing use of
28 one or more of Accused Instrumentalities and Amazon webpages showing sale or offer for

1 sale of one or more of Accused Instrumentalities. Lian Li expects to obtain additional
2 discovery on Thermaltake's first infringement and reserves the right to supplement and
3 amend these contentions.

4 **VIII. WILLFUL INFRINGEMENT**

5 Thermaltake is and has been willfully infringing the '336 patent since at least May
6 2023 when Thermaltake received a letter sent on behalf of plaintiff Chen, Chien-Hao,
7 informing Thermaltake the infringement by the "SWAFAN EX 12 RGB product."
8 Thermaltake further received a cease-and-desist letter in June 2023, asking Thermaltake to
9 stop infringing the '336 patent. Thermaltake was then sued for infringement of the '336
10 patent and served with the Complaint (Dkt. No. 1) in September 2023. Thermaltake thus is
11 and has been knowingly and deliberately infringing the '336 patent since no later than May
12 2023. Lian Li expects to obtain additional discovery on Thermaltake's willful infringement
13 and reserves the right to supplement and amend these contentions.

14
15 Dated: March 6, 2024

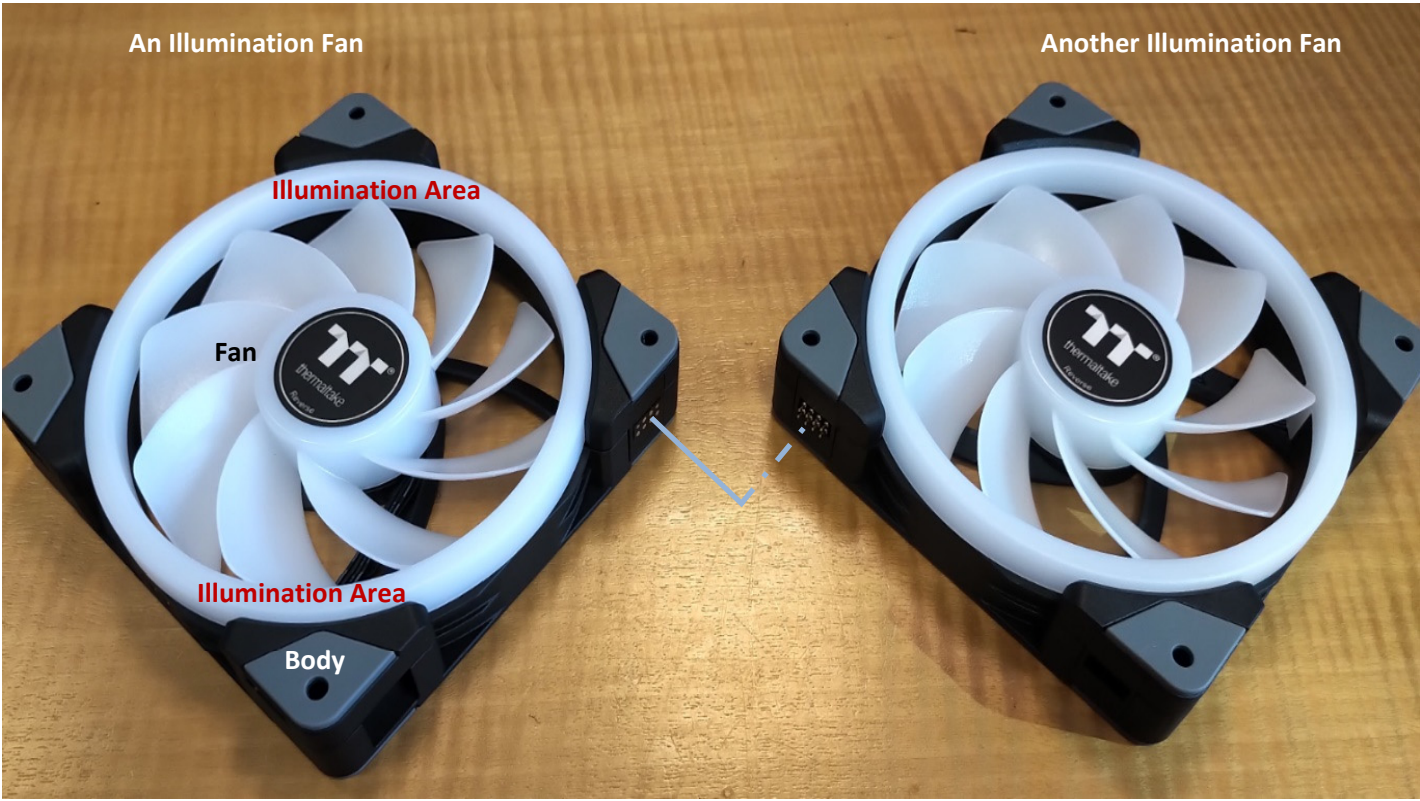
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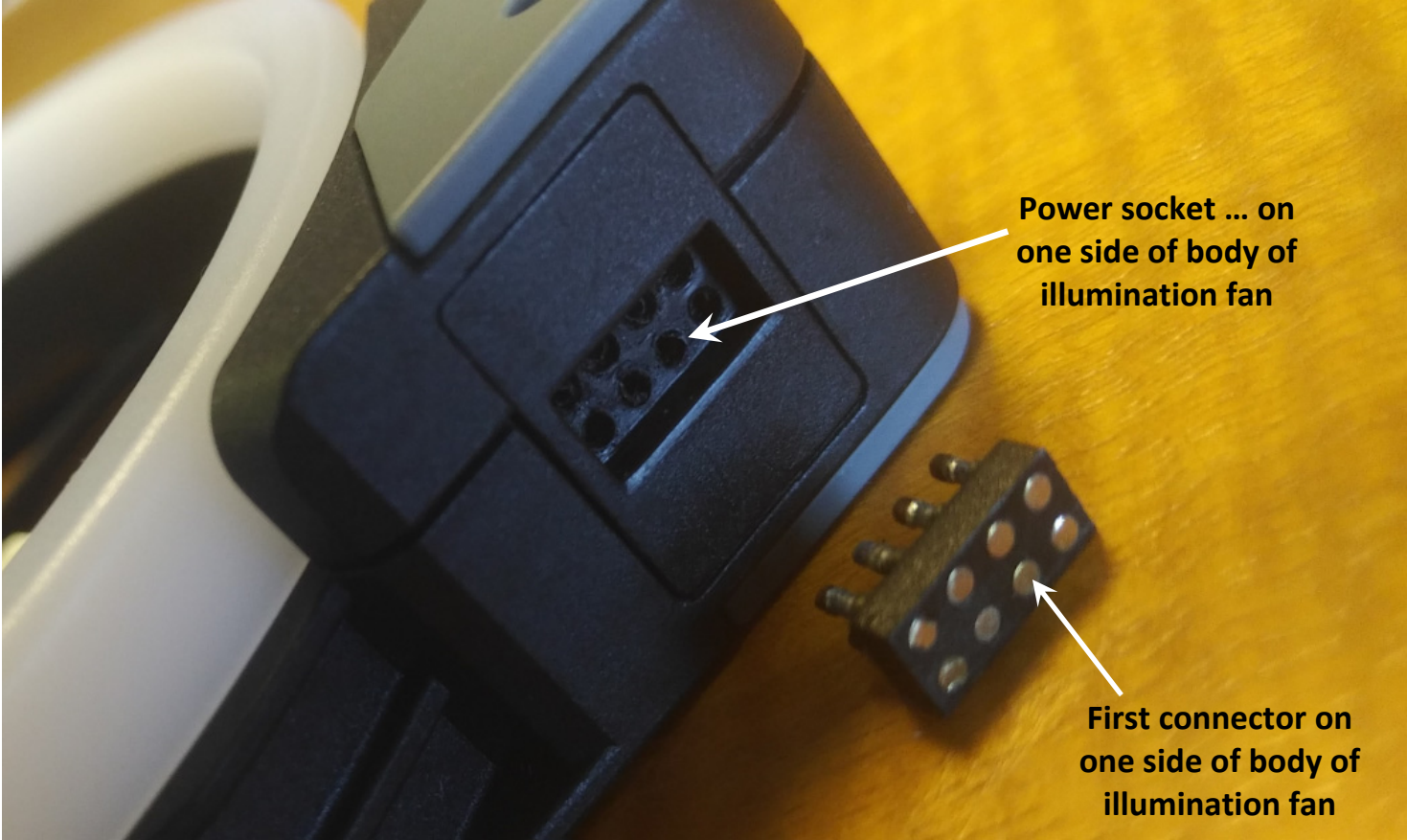
16 By: /s/ Kyle D. Chen

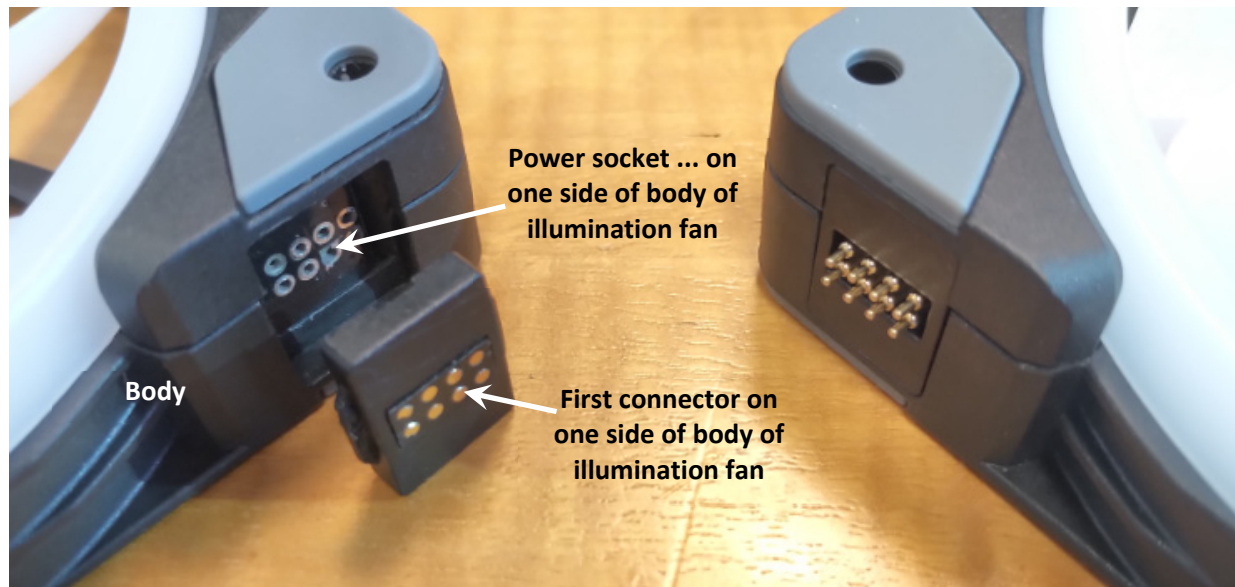
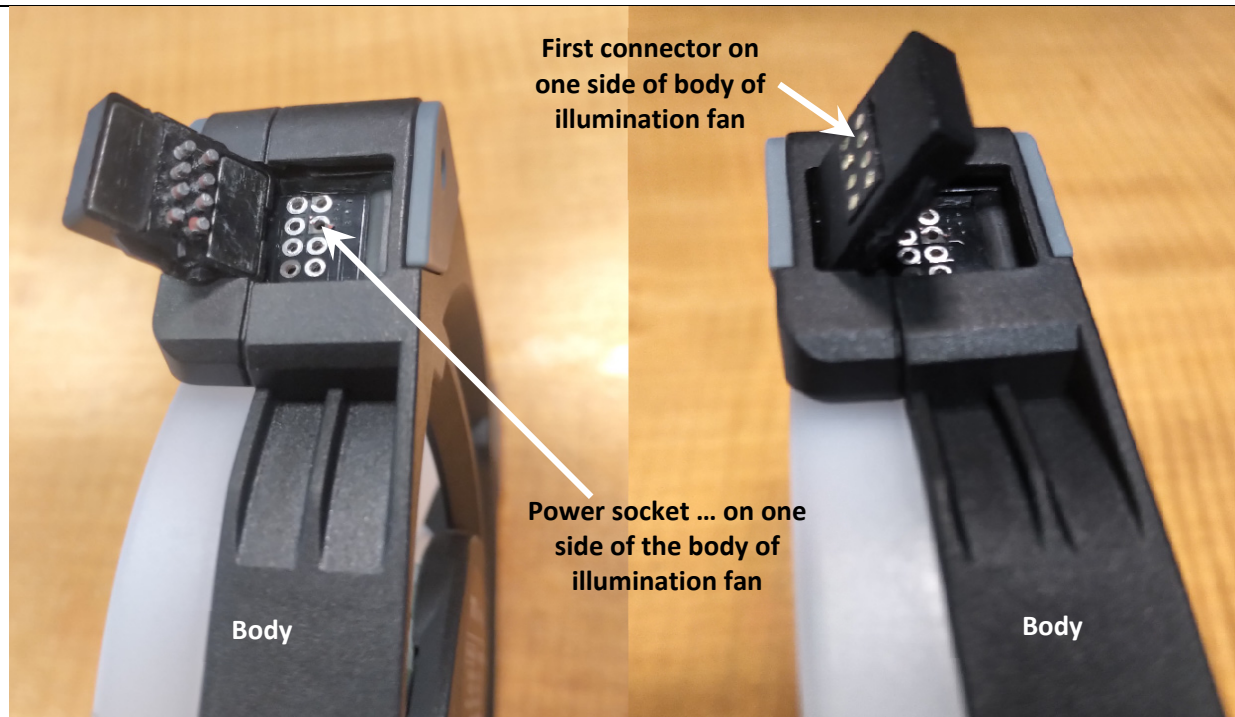
17 Kyle D. Chen

18 Attorneys for Plaintiffs Lian Li Industrial Co., Ltd.
19 and Chen, Chien-Hao
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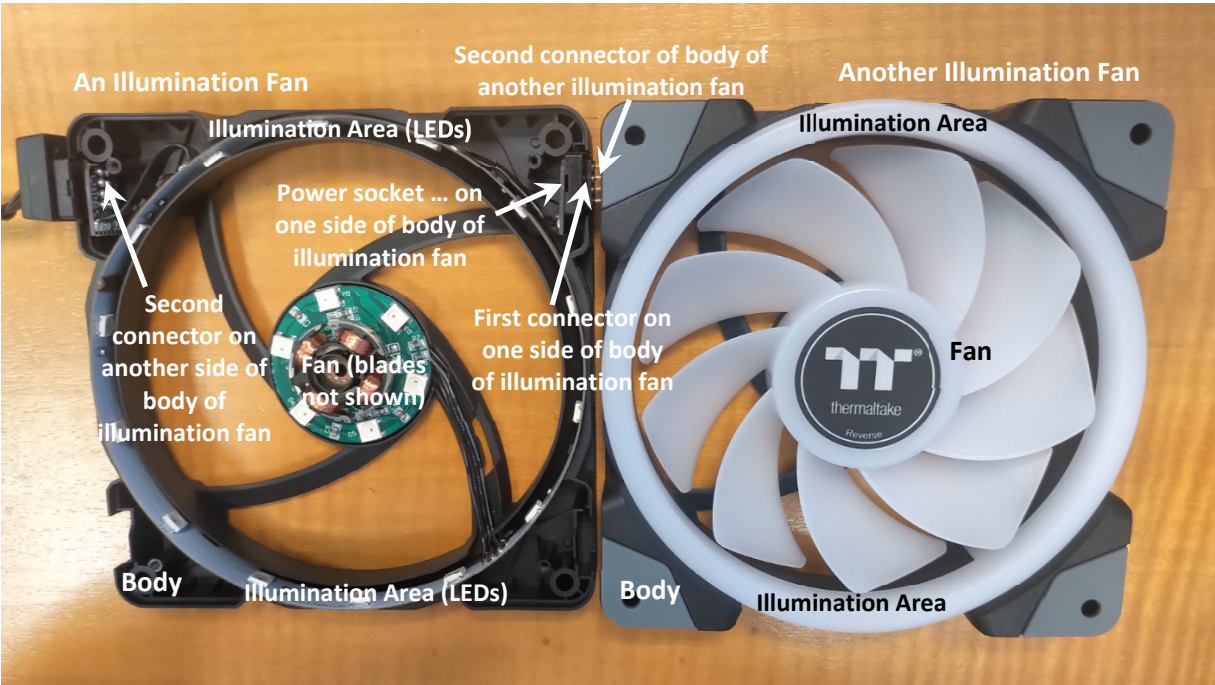
Lian Li Industrial Co., Ltd. et al. v. Thermaltake Co., Ltd. et al., 2:23-cv-07470 HDV (MARx) (C.D. Cal.)
Infringement Claim Chart for U.S. Patent No. 10,690,336

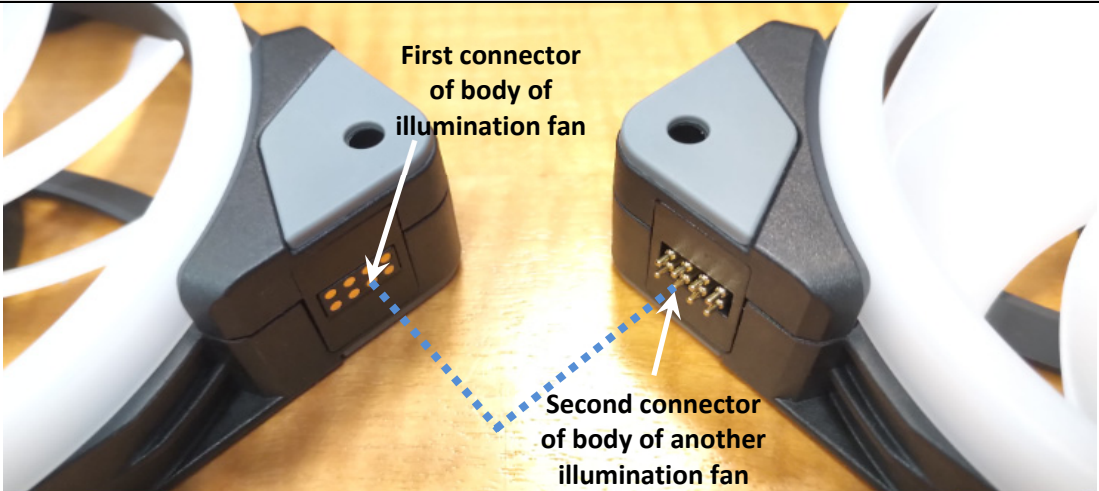
'336 Patent Claim	Evidence of Infringement
1. An illumination fan connectable with at least one illumination fan for a computer, comprising: a body, provided with a fan in center of the body, an illumination area on at least two sides of the fan at top of the body,	As a non-exclusive example, Thermaltake's Swafan meets each element of claim 1 of the '336 patent literally or under the doctrine of equivalents, as shown below:  As can be seen above, the Swafan includes “[a]n illumination fan [on the left] 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 [of the illumination fan on the left, and] another illumination fan [on the right].” The illumination area of the illumination fan on the left includes the LEDs that are positioned adjacent to the fan on the at least two sides of the fan at the top of the body. These LEDs are shown, for example, in the illustration on page A-5 below.

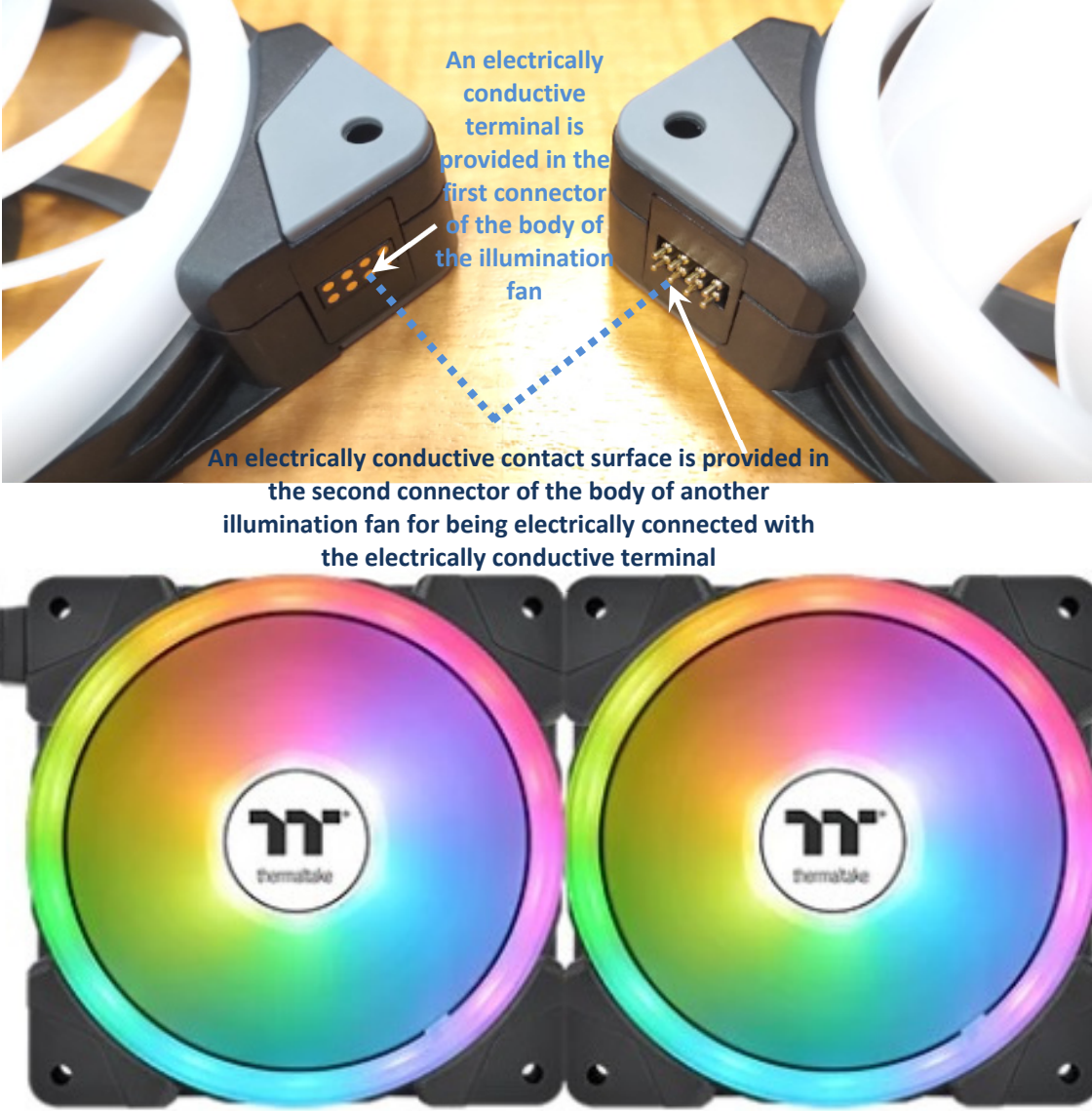
'336 Patent Claim	Evidence of Infringement
a power socket and a first connector on one side of the body, and	The illumination fan also includes “a power socket and a first connector on one side of the body” as shown below:  Power socket ... on one side of body of illumination fan First connector on one side of body of illumination fan Below is another view of the “power socket ... on one side of the body” of the illumination fan and the “first connector on one side of the body” of the illumination fan. As can be seen above and below, the illumination fan’s “power socket” is located on the same “one side” as that the illumination fan’s “first connector” is located on.



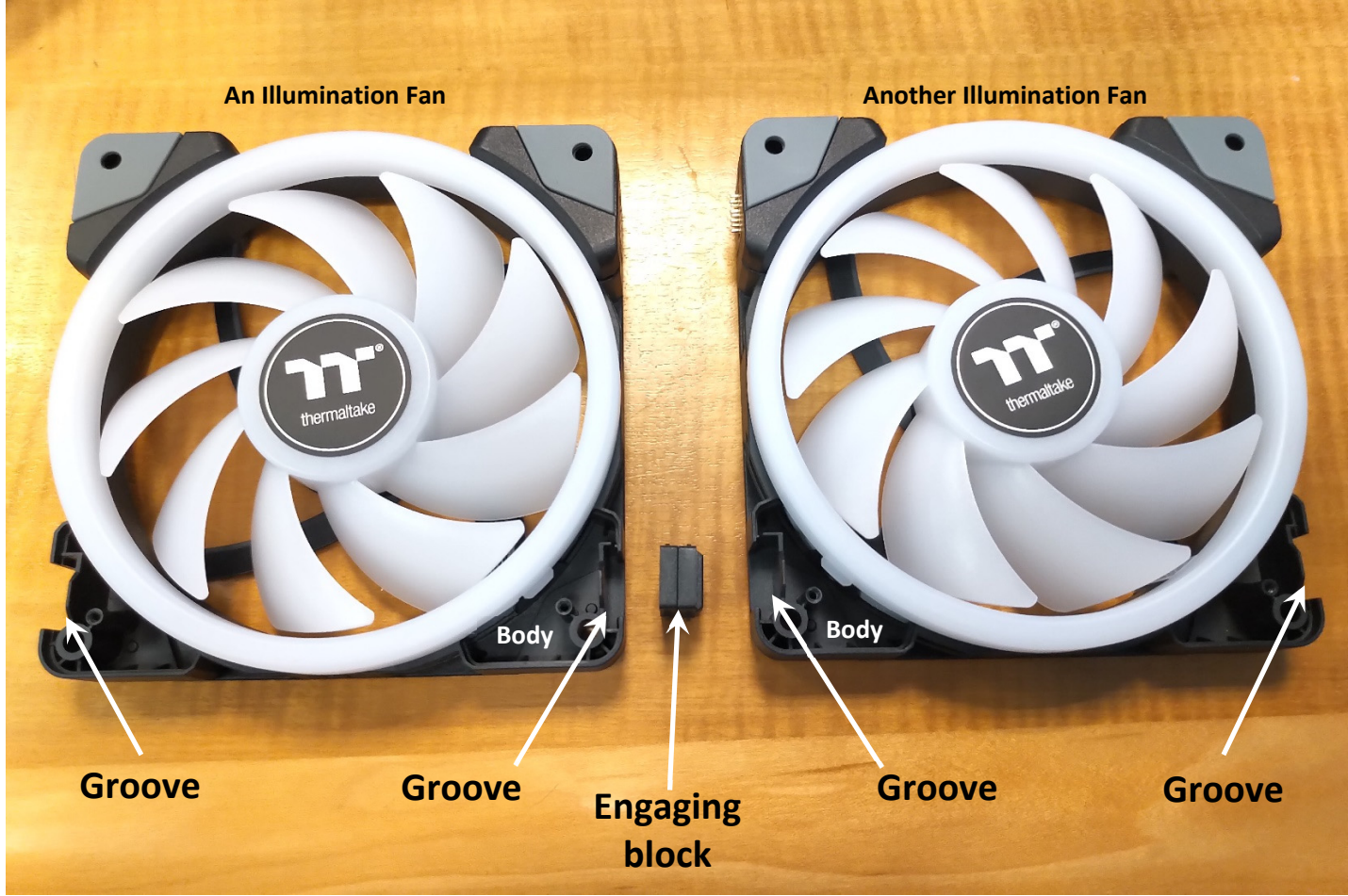
'336 Patent Claim	Evidence of Infringement
a second connector on another side of the body,	As can be seen below, the illumination fan further includes “a second connector on another side of the body”: 

'336 Patent Claim	Evidence of Infringement
wherein 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.	Furthermore, as can be seen in the illustration below (showing the illumination fan on the left with portions of the housing and the fan blades removed to show its internal structures), “the power socket [on the one side of the body of the illumination fan on the left] is electrically connected with the first connector, the second connector, the fan [including the fan blades (not shown), the coils and the printed circuit board at the center of the body] and the illumination area [of the illumination fan on the left, including the LEDs], such that when the power socket on the one side of the body [of the illumination fan on the left] is supplied with power, the fan and the illumination area of the body [of the illumination fan on the left] are respectively driven into rotation and illumination, and when the first connector of the body [of the illumination fan on the left] is connected with a second connector of a body of another illumination fan [on the right], a fan and an illumination area of the body of another illumination fan [on the right] are respectively driven into rotation and illumination”:  As shown, the illumination area of the illumination fan on the left includes the noted LEDs, which are driven into illumination when the power socket is supplied with power, and when the first connector of the body of the illumination fan 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:

'336 Patent Claim	Evidence of Infringement
	 First connector of body of illumination fan Second connector of body of another illumination fan  In sum, the exemplary Swafan (in operation, as shown above, with individual fan blades blended together and not visible) meets each limitation of claim 1 of the '336 patent literally or under the doctrine of equivalents.

'336 Patent Claim	Evidence of Infringement
2. The illumination fan connectable with at least one illumination fan for a computer of claim 1, wherein an electrically conductive terminal is provided in the first connector, and an electrically conductive contact surface is provided in the second connector for being electrically connected with the electrically conductive terminal, such that when the first connector of the body of the illumination fan is connected with the second connector of the body of another illumination fan, the fan and the illumination area of the body of another illumination fan are respectively driven into rotation and illumination.	As a non-exclusive example, Thermaltake's Swafan meets each element of claim 2 of the '336 patent literally or under the doctrine of equivalents, as shown below: 

'336 Patent Claim	Evidence of Infringement
	When the first connector of the body of the illumination fan is connected with the second connector of the body of another illumination fan, the fan and the illumination area of the body of another illumination fan are respectively driven into rotation and illumination. Thus, the exemplary Swafan (in operation, as shown above, with individual fan blades blended together and not visible) meets each limitation of claim 2 of the '336 patent literally or under the doctrine of equivalents.
3. The illumination fan connectable with at least one illumination fan for a computer of claim 1, wherein when the body of the illumination fan is connected with the body of another illumination fan, the illumination areas of the two bodies form a continuous illumination area.	As a non-exclusive example, Thermaltake's Swafan meets each element of claim 3 of the '336 patent literally or under the doctrine of equivalents, as shown below:  The image shows two identical Thermaltake Swafan fans connected side-by-side. Each fan has a circular frame with a rainbow-colored LED ring. The fans are mounted on a black frame. The central hub of each fan features the Thermaltake logo. The fans are shown in operation, with the LED rings illuminated, creating a continuous rainbow glow across both fans. When the body of the illumination fan on the left is connected with the body of another illumination fan on the right, the illumination areas of the two bodies form a continuous illumination area. Thus, the exemplary Swafan (in operation, as shown above, with individual fan blades blended together and not visible) meets each limitation of claim 3 of the '336 patent literally or under the doctrine of equivalents.

'336 Patent Claim	Evidence of Infringement
5. The illumination fan connectable with at least one illumination fan for a computer of claim 1, wherein a groove is provided on two sides of the body of the illumination fan, and the body of the illumination fan is connected with the body of another illumination fan by respectively engaging an engaging block with one of the grooves on the sides of the body of the illumination fan and one of the grooves on the sides of the body of another illumination fan.	As a non-exclusive example, Thermaltake's Swafan meets each element of claim 3 of the '336 patent literally or under the doctrine of equivalents, as shown below:  As can be seen above and below, a “groove” is provided on two sides of the body of the Swafan, which also includes an “engaging block” between the two illumination fans.

'336 Patent Claim	Evidence of Infringement
	The image consists of two side-by-side photographs of a mechanical assembly. On the left, two black plastic fan bodies are shown, each with a white 'Groove' on its side. A black 'Engaging block' is positioned between them. A blue arrow points from this state to the right-hand photograph. On the right, the two fan bodies are joined together, with the 'Engaging block' fitting into the 'Grooves' of both. Labels 'Body', 'Groove', and 'Engaging block' are used with white arrows to identify the parts in both images. As shown above, “the body of the illumination fan [on the left] is connected with the body of another illumination fan [on the right] by respectively engaging [the] engaging block [between the two illumination fans] with one of the grooves on the sides of the body of the illumination fan [on the left] and one of the grooves on the sides of the body of another illumination fan [on the right].” Thus, as shown, the exemplary Swafan meets each limitation of claim 5 of the '336 patent literally or under the doctrine of equivalents.

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