Karen I. Boyd (State Bar No. 189808)
boyd@turnerboyd.com
Megan Olesek (State Bar No. 191218)
olesek@turnerboyd.com
Zhuanjia Gu (State Bar No. 244863)
gu@turnerboyd.com
TURNER BOYD SERAPHINE LLP
155 Bovet Road, Suite 750
San Mateo, California 94402
Telephone: (650) 521-5930

Gregory F. Corbett (*pro hac vice* to be filed)
gcorbett@wolfgreenfield.com
Charles T. Steenburg *(pro hac vice* to be filed)
csteenburg@wolfgreenfield.com
Elizabeth A. DiMarco *(pro hac vice* to be filed)
edimarco@wolfgreenfield.com
Eric J. Rutt *(pro hac vice* to be filed)
erutt@wolfgreenfield.com
Jie Xiang *(pro hac vice* to be filed)
jxiang@wolfgreenfield.com
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
Telephone: (617) 646-8000

Attorneys for Plaintiff
Infineon Technologies Austria AG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

INFINEON TECHNOLOGIES AUSTRIA AG, Plaintiff, v. INNOSCIENCE (SUZHOU) TECHNOLOGY COMPANY, LTD., INNOSCIENCE (ZHUHAI) TECHNOLOGY COMPANY, LTD., and INNOSCIENCE AMERICA, INC., Defendants.	Case No. 3:24-cv-01553 **COMPLAINT FOR PATENT INFRINGEMENT** **DEMAND FOR JURY TRIAL**

Plaintiff Infineon Technologies Austria AG ("Plaintiff" or "Infineon") files this action for patent infringement against Defendants Innoscience (Suzhou) Technology Company, Ltd. ("Innoscience Suzhou"), Innoscience (Zhuhai) Technology Company, Ltd. ("Innoscience Zhuhai") and Innoscience America, Inc. ("Innoscience America") (collectively, "Innoscience" or the "Defendants") and allege as follows.

NATURE OF THE ACTION

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 No. 9,899,481 ("the '481 patent") (the "Asserted Patent") at least by using, selling, offering for sale, and importing into the United States gallium nitride ("GaN") products that infringe one or more claims of the Asserted Patent.

3. Infineon is the legal owner by assignment of the entire right, title, and interest in and to the Asserted Patent, which was duly and legally issued by the United States Patent and Trademark Office ("USPTO"). Infineon seeks monetary damages and injunctive relief to address past and ongoing infringement of its valuable intellectual property.

THE PARTIES

4. Plaintiff Infineon Technologies Austria AG is a corporation organized under the laws of Austria having a principal place of business at Siemensstraße 2, A-9500 Villach, Austria.

5. On information and belief, Defendant Innoscience (Suzhou) Technology Company, Ltd. is a Chinese corporation that has its principal place of business and headquarters at No. 98, Xinli Road, Lili Town, Wujiang District Suzhou, Jiangsu, 215211 China. On information and belief, Innoscience Suzhou is the parent company to subsidiaries Innoscience Zhuhai and Innoscience America.

6. On information and belief, Defendant Innoscience (Zhuhai) Technology Company, Ltd. is a Chinese corporation that has a principal place of business and headquarters at No. 39, Jinyuan 2nd Road, High-Tech Zone, Zhuhai, Guangdong, 519085 China.

7. On information and belief, Defendant Innoscience America, Inc. is a California corporation that has its principal place of business at 5451 Great America Parkway, Suite 125, Santa Clara, California 95054.

JURISDICTION

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. This Court has personal jurisdiction over each of the Defendants.

10. Innoscience America is subject to general personal jurisdiction in the State of California because it is incorporated in the State of California.

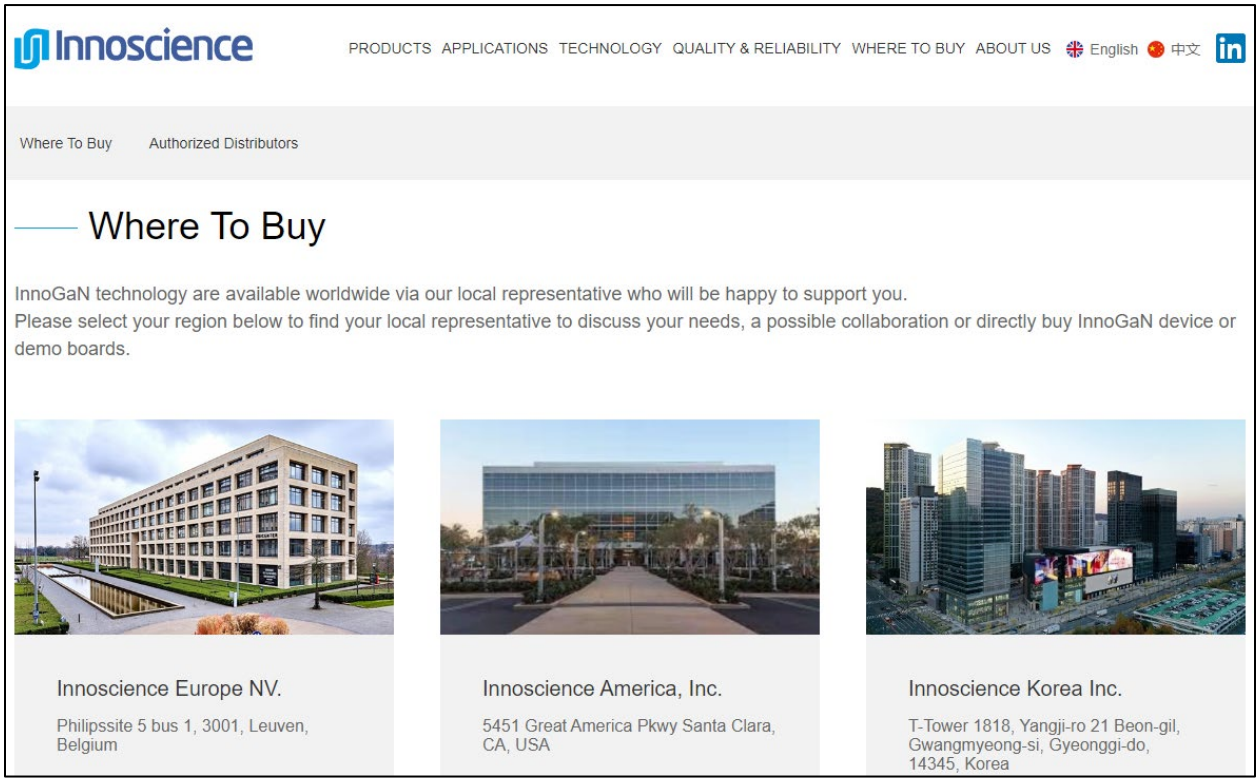
11. Innoscience Suzhou and Innoscience Zhuhai are subject to specific jurisdiction in this District under Federal Rule of Civil Procedure 4(k)(1) and the California Long Arm Statute, Cal. Code Civ. Proc. § 410.10 (the "California Long Arm Statute") due to at least Innoscience Suzhou and Innoscience Zhuhai's 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.

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

13. On information and belief, Innoscience manufactures the Accused Products (defined below) in fabrication plants in Zhuhai and Suzhou, China.

14. On information and belief, Innoscience Suzhou and Innoscience Zhuhai direct their products to the United States and California via Innoscience America and third-party distributors which market and sell Innoscience products to customers.

15. The Innoscience website (https://www.innoscience.com/) features a "WHERE TO BUY" tab, which allows customers in the United States to "directly buy" Innoscience products from Innoscience America, Inc., located in Santa Clara, California.



16. In a 2022 press release, Innoscience said it had "signed a global distribution agreement with Richardson RFPD." https://www.innoscience.com/site/details/472

17. The Innoscience website identifies Innoscience's "Authorized Distributors," which include "Richardson RFPD."

18. Richardson RFPD's website lists each of the Accused Products for sale online in the United States. https://shop.richardsonrfpd.com/

19. On information and belief, Innoscience uses Richardson RFPD as an established distribution channel to market and sell its products to customers throughout the United States, including California.

20. On information and belief, Innoscience Suzhou, Innoscience Zhuhai, and Innoscience America are related entities that operate as part of a corporate group or common business enterprise that operates under the Innoscience brand.

21. On information and belief, Innoscience America directly infringes the Asserted Patent by importing, offering for sale, selling, and using the Accused Products in the United States, and induces customers to use the Accused Products in a manner that infringes the Asserted Patent.

22. On information and belief, Innoscience Suzhou and Innoscience Zhuhai induce infringement of the Asserted Patent by making infringing products and placing them into the stream of commerce, with the knowledge or understanding that such products are sold in California, including in this District, and throughout the United States. Upon information and belief, Defendants derive substantial revenue from the sale of infringing products within this District, expect their actions to have consequences within this District, and derive substantial revenue from interstate and international commerce.

23. On information and belief, Innoscience Suzhou and Innoscience Zhuhai maintain purposeful contacts with this District and with the United States, including but not limited to: (1) by manufacturing the Accused Products for Innoscience for sale in California and in the United States, and (2) by being part of Innoscience's established supply chain and distribution channels that target customers in California and throughout the United States; and (3) by putting the Accused Products into the stream of commerce with the expectation that they will be purchased by Innoscience America and by customers in California and throughout the United States.

VENUE AND INTRADISTRICT ASSIGNMENT

24. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Innoscience America is incorporated in California and has a regular and established place of business in this District. Innoscience Suzhou and Innoscience Zhuhai 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, importing, offering to sell, selling, and using within the United States products that infringe the Asserted Patent.

25. Pursuant to Civil Local Rules 3-5(b) and 3-2(c), because this is an intellectual property action, it is properly assigned to any of the divisions of this District.

FACTUAL BACKGROUND

Infineon's Patented Technologies

26. Infineon is a leading designer and manufacturer of semiconductors used in a variety of microelectronic applications, including computer systems, telecommunication systems, consumer goods, automotive products, industrial automation and control systems, and chip card applications.

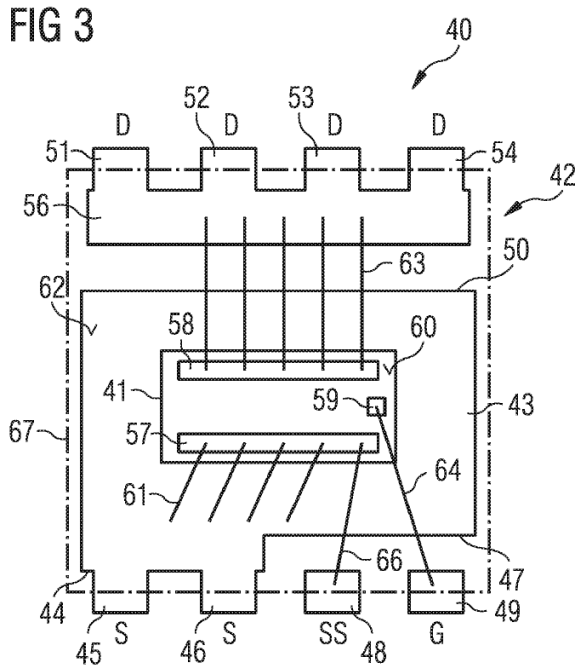
27. Infineon Technologies Austria AG and its parent Infineon Technologies AG have continuously invested in innovation, resulting in a portfolio that includes thousands of unexpired patents in the United States and in other countries across the globe.

Infineon's Asserted Patent

28. This complaint focuses on an Infineon patent directed to a lateral transistor device and package with source-sensing functionality.

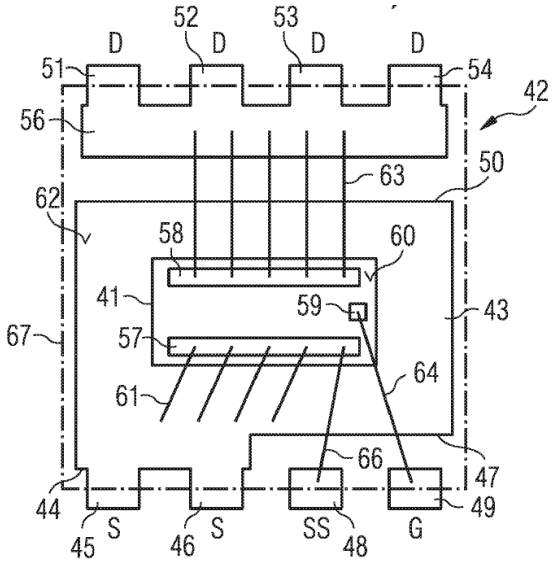
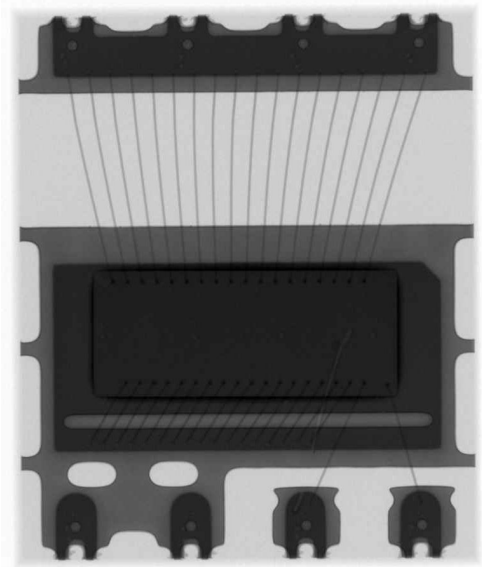
29. Infineon is the current owner by assignment of the entire right, title, and interest in and to the '481 patent titled "Electronic component and switch circuit." The '481 patent issued on February 20, 2018. A copy of the '481 patent is attached as Exhibit A.

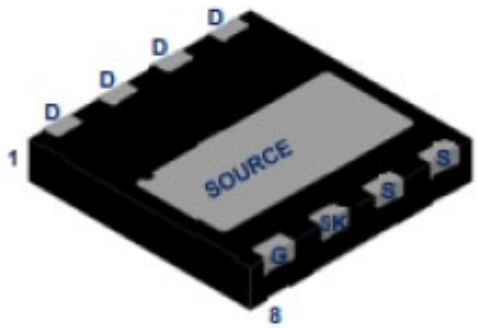
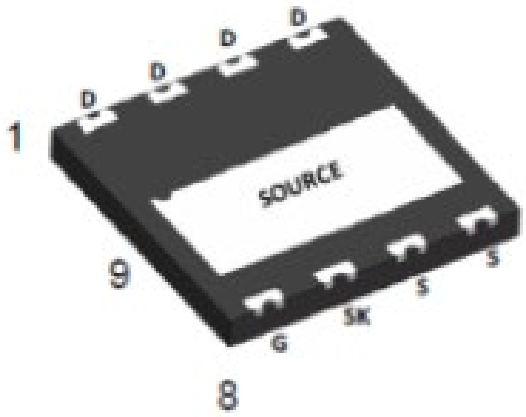
30. The '481 patent discloses a compound semiconductor transistor device such as a lateral high electron mobility transistor (HEMT) housed within a surface mountable device (SMD) package that can provide a source sense functionality to exclude parasitic source inductance that could result in increased energy loss at high switching speeds, as depicted in Figure 3.



Defendants' Incorporation of Infineon's Patented Technologies into Their Devices

31. Innoscience's Accused Products replicate Infineon's inventive technology, as illustrated below.

	
'481 Patent, Fig. 3	**Innoscience Accused Product**

	
Infineon's Inventive Technology	**Innoscience Accused Product**

32. For example, the Innoscience Accused Products include a plurality of bond wires (61) that couple a source pad (57) to a die pad (43). The Accused Products also include Kelvin Source (KS), which practices the patented Source-Sensing (48) functionality (SS) that provides improved performance.

33. According to its website, Innoscience established a mass production 8-inch wafer line for GaN-on-Si devices in November 2017. By the end of August 2023, Innoscience had mass-produced 54 different types of high-voltage GaN devices (650V-700V) and 20 types of medium-low voltage GaN devices (30V-150V). Products span three device categories: wafers, discrete devices and integrated solutions. As of September 19, 2023, Innoscience had shipped more than 300 million InnoGaN gallium nitride devices. https://www.innoscience.com/site/details/493.

34. On its website, Innoscience touts the numerous applications of the infringing GaN products. https://www.innoscience.com/site/application. These applications include:

- Adapters ("The high frequency and high efficiency characteristics of Innoscience's GaN technology meet these requirements enabling efficient and compact adapters. Several adapters (in-box and out-box) are already successfully using Innoscience's GaN technology and sold in the consumer market."); *Id.*
- Wireless charging ("Compared to traditional Silicon technology, Innoscience's GaN technology has the advantages of smaller parasitic capacitance, faster switching speed and smaller on-resistance per unit area. When applied to wireless charging system, Innoscience's GaN technology reduces both the switching and

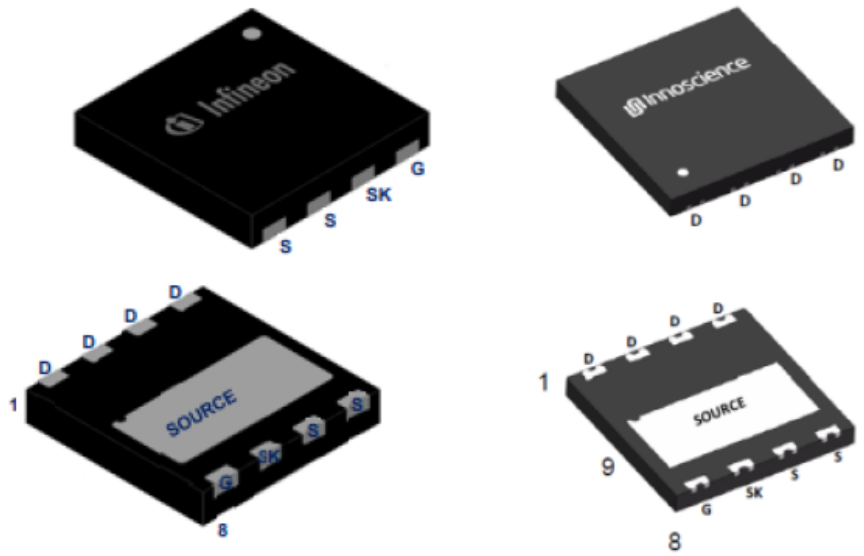
conduction loss, thus enabling wireless charging system with higher system efficiency and longer transmission distance."); *Id.*

- Class-D audio amplifier ("InnoGaN™ transistors area ideal for class-D amplifier by combining fast switching speed, low switching loss, small parasitic capacitance etc."); *Id.*
- Over Voltage Protection ("OVP") ("The size of each unit inside a mobile phone or laptop is of paramount importance and InnoGaN™ transistors enable the OVP unit to be 50% smaller than the one made with Silicon technology."); *Id.*
- Time of Flight ("ToF") ("Innoscience's GaN Technology with smaller area cost and higher performance is a better choice for ToF system."); *Id.*
- Motor driver and control ("InnoGaN™ enables motor driver and inverters to be smaller, lighter, cheaper, more reliable and efficient with respect to what is possible today with Silicon technology."); *Id.*
- Telecom infrastructure ("InnoGaN™ enables highly efficient and small volume power supply systems for 5G base station and thus lower their power consumption. This is thanks to the inherent property of InnoGaN™ device, such as small parasitic capacitance, fast switching speed and small static and dynamic losses."); *Id.*
- LED lighting ("LED driver based on InnoGaN™ technology can have a 90% reduction of the driver losses when switching at higher frequency (e.g. 400KHz)," "LED drivers powered by InnoGaN™ devices show smaller switching conduction losses, higher efficiency, higher switching frequency and an overall reduction of the driver size that becomes much smaller and thinner than what would be possible with Silicon technology."); *Id.*
- Photovoltaic and energy storage system ("Thanks to the inherent property of InnoGaN™ device, such as low static and dynamic losses, small parasitic capacitance, fast switching speed, high frequency capabilities etc. InnoGaN™ can effectively increase the efficiency of (micro-) inverters, auxiliary power supply and on the maximum power point tracker (MPPT)."); *Id.*

- Data center ("Power conversion systems based on Innoscience's GaN technology are overall more efficient and thus consume less energy that means less pollution and lower energy bill. They are also more compact and reliable thanks to the high frequency capabilities of InnoGaN™ devices."); *Id.*
- On-Board Charger (OBC) for automotive ("Thanks to the inherent property of InnoGaN™ device, such as small parasitic capacitance, fast switching speed, high frequency capabilities and small static and dynamic losses, it is possible to make OBC systems more efficient."); *Id.*
- 48V power system ("Thanks to the excellent switching characteristics and high frequency capabilities of InnoGaN™, which is at least a factor 2 higher than Silicon, it is possible to make 48V DC-DC converters smaller and lighter, by shrinking the passive components, as well as to make them more efficient by reducing the loss related to inductors;") *Id.*
- Battery Management System (BMS) ("Thanks to the fact that InnoGaN™ devices do not have a body diode, it is easy to replace the two Silicon NMOS, today used in standard BPU, by one InnoGaN™. This saves in costs and makes the system overall simpler and more efficient."). *Id.*

35. In January 2022, Innoscience announced the official launch of its international operations in the United States. Yi Sun, General Manager, Innoscience America, Inc., explained: "This is an exciting time for our customers, who can benefit from Innoscience's applications understanding and demo boards to develop their unique solutions. This will allow us to better support our customers in the USA." https://www.innoscience.com/site/details/375.

36. In a 2023 presentation at an industry session of the Applied Power Electronics Conference ("APEC") held in Orlando, Florida from March 19 to March 23, 2023, Innoscience highlighted the similarities between its product and Infineon's inventive technology in its presentation to the industry. In one slide, Innoscience compared Infineon's IGLD60R190D1 product (shown below on left) with Innoscience's INN650D190A product (shown below on right). Innoscience identified the identical pin layouts for the gate, drain, Kelvin Source, and source.



Gate	8
Drain	1,2,3,4
Kelvin Source	7
Source	5,6

Table 2 Pin information

Gate	Drain	Kelvin Source	Source
8	1,2,3,4	7	5,6,9

Exhibit B, p. 19.

37. Innoscience explained to the audience, which included its target customers such as "system engineers/architects and business-oriented people such as purchasing agents" (https://www.aconf.org/conf_146150.html), that Innoscience's products are "pin-to-pin compatible" with Infineon's products in the hope of inducing Infineon customers to switch to Innoscience's Accused Products.

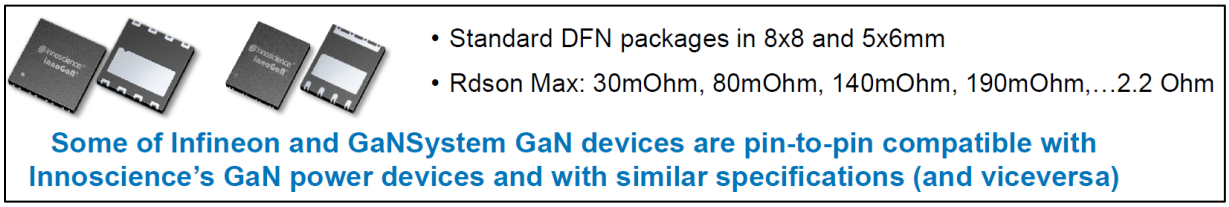


Exhibit B, p. 19.

38. Just last month, Innoscience again touted the benefits of its infringing products to potential customers at APEC 2024, which was held in Long Beach, California from February 25 to February 29, 2024. https://www.innoscience.com/site/details/714.

39. At its booth at APEC 2024, Innoscience advertised the diverse applications and markets that it seeks to exploit with GaN.

40. For example, in a presentation at an industry session of APEC 2024, Innoscience touted that with its 650V InnoGaN, it is possible to make a 2kW power supply unit ("PSU") meeting the recent stringent 80 Plus titanium efficiency rating. The presentation also featured a 2kW PSU Demo that utilizes several INN650D080BS InnoGaN FETs, which is one of the Accused Products. Exhibit C, 5-6.

41. Innoscience also advertised the INN650D080BS and its ability to meet the titanium energy efficiency standards in the flyers it handed out, as depicted below (annotations added).

Innoscience Solution for Datacenter

ADVANTAGES

1. 80+ platinum with 40% higher power density --- PSU

REFERENCE DESIGN

2kW PSU

Size: 185mm * 65mm * 36mm

Power density: 76W/in3

Efficiency: Meets titanium energy efficiency standards

InnoGaN: LLC: INN650D080BS * 2pcs

Slow bridge: INN650TA030AH * 2pcs

Fast bridge: INN650TA070AH * 2pcs

42. Innoscience advertised that the same product provides a "more energy-efficient" solution for energy storage in the solar space, as depicted below (annotations added).

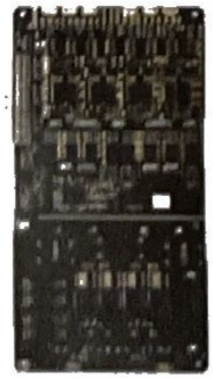
Innoscience.

Innoscience Solution for Solar

ADVANTAGES

1. 15% increase in power generation---Micro inverter
2. Reduce conversion loss by 50%, more energy-efficient---Energy storage
3. Reduce board area by 40%---BMS

1.2kW Energy storage bidirectional converter



Size: 205mm*85mm*24mm

Efficiency : 91%

Power Density : 47W/in^3

InnoGaN: INN650D080BS*4pcs

INN040FQ015A*32pcs

43. The 2024 APEC presentation also touted reliability of Innoscience's GaN power devices at a switching frequency of 100 kHz. Exhibit C, 16-18.

44. The infringing products include, but are not limited to, Innoscience products containing a lateral transistor device and having source sensing functionality (collectively "Accused Products"). The Accused Products include, but are not limited to, the following: INN650D080BS, INN650D140A, INN650D190A, INN650D240A, INN650D350A, INN650DA140A, INN650DA190A, INN650DA240A, INN650DA350A, INN650DA500A,

INN650DA600A, INN700D140C, INN700D190B, INN700D190C, INN700D240B, INN700D240C, INN700D350B, INN700DA140C, INN700DA190B, INN700DA240B, INN700DA350B, INN700DA480B, INN700DA600B, INN700DC140A, INN700DC140C, INN700DC190C, INN700DC240A, INN700DC240C, INN700DC350A, INN650TA030AH.

45. The Accused Products are non-limiting examples that were identified based on publicly available information, and Infineon reserves the right to identify additional infringing activities, products and services, including, for example, on the basis of information obtained during discovery.

46. Defendants have made extensive use of Infineon's patented technologies, including the technology described and claimed in the Asserted Patent. Infineon is committed to defending its proprietary and patented technology. Infineon requests that this Court award it damages sufficient to compensate for Defendants' infringement of the Asserted Patent, find this case exceptional and award Infineon its attorneys' fees and costs, and grant an injunction against Defendants to prevent ongoing infringement of the Asserted Patent.

47. The allegations provided herein are exemplary and without prejudice to Infineon's infringement contentions to be served pursuant to the Court's scheduling order in this case. In providing these allegations, Infineon does not convey or imply any particular claim constructions or the precise scope of the claims. Infineon's claim construction contentions regarding the meaning and scope of the claim terms will be provided pursuant to the Court's scheduling order.

COUNT I

(Infringement of U.S. Patent No. 9,899,481)

48. Infineon incorporates by reference and realleges all the foregoing paragraphs as if fully set forth herein.

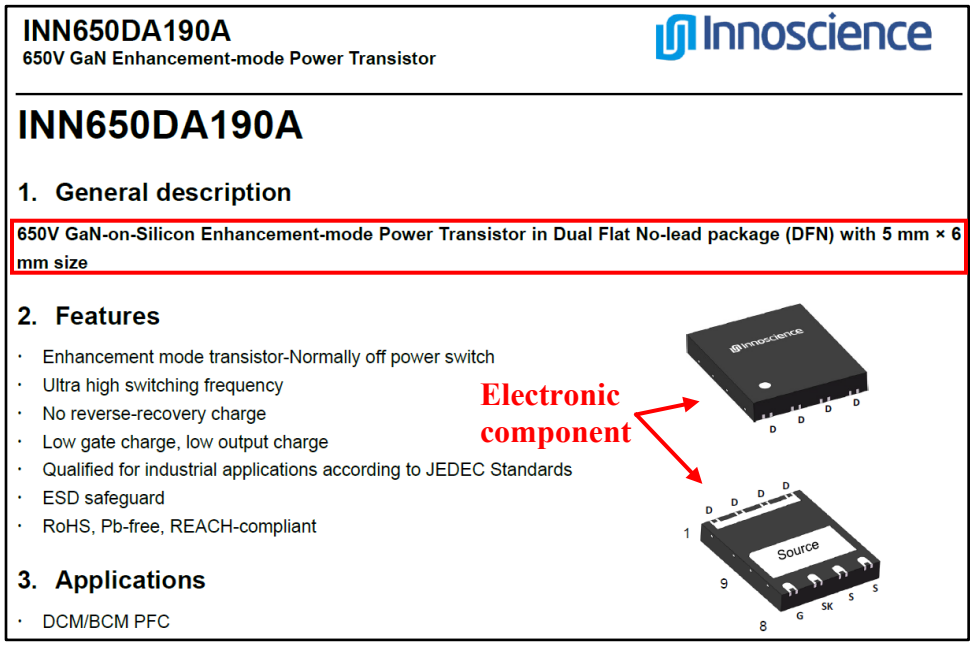
Direct Infringement

49. Innoscience America has directly infringed and continues to directly infringe, literally and/or equivalently, one or more claims of the '481 patent, including at least claim 1, including by importing, using, selling, and offering for sale in the United States the Accused Products.

50. On information and belief, Innoscience Suzhou and Innoscience Zhuhai have directly infringed and continue to directly infringe by importing, selling, or offering for sale in the United States the Accused Products.

51. The Accused Products (*e.g.*, INN650DA190A) literally include each element of at least claim 1 of the '481 patent. To the extent that any element is not literally present, such element is present under the doctrine of equivalents.

52. The Accused Products (*e.g.*, INN650DA190A) include an electronic component. For example:



INN650DA190A
650V GaN Enhancement-mode Power Transistor

Innoscience

INN650DA190A

1. General description

650V GaN-on-Silicon Enhancement-mode Power Transistor in Dual Flat No-lead package (DFN) with 5 mm × 6 mm size

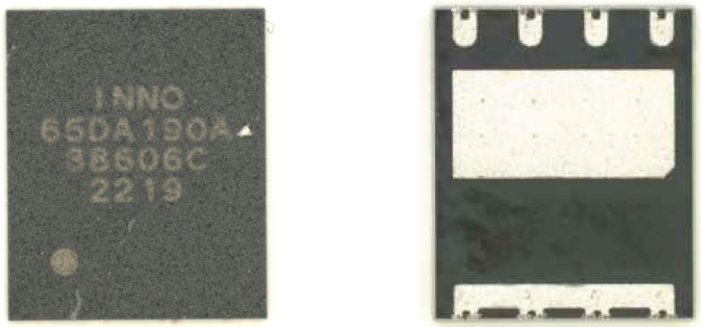
2. Features

- Enhancement mode transistor-Normally off power switch
- Ultra high switching frequency
- No reverse-recovery charge
- Low gate charge, low output charge
- Qualified for industrial applications according to JEDEC Standards
- ESD safeguard
- RoHS, Pb-free, REACH-compliant

3. Applications

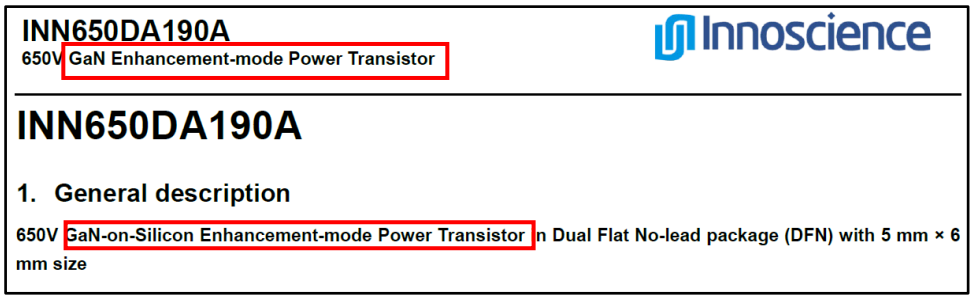
- DCM/BCM PFC

Exhibit D, INN650DA190A Datasheet, at 1 (annotations added)



Pictures of top side (left panel) and bottom side (right panel) of INN650DA190A

53. The Accused Products (*e.g.*, INN650DA190A) include a GaN power transistor, which is a compound semiconductor transistor device. For example:


INN650DA190A
650V GaN Enhancement-mode Power Transistor

Innoscience

INN650DA190A

1. General description

650V GaN-on-Silicon Enhancement-mode Power Transistor in Dual Flat No-lead package (DFN) with 5 mm × 6 mm size

Exhibit D, INN650DA190A Datasheet, at 1 (annotations added)

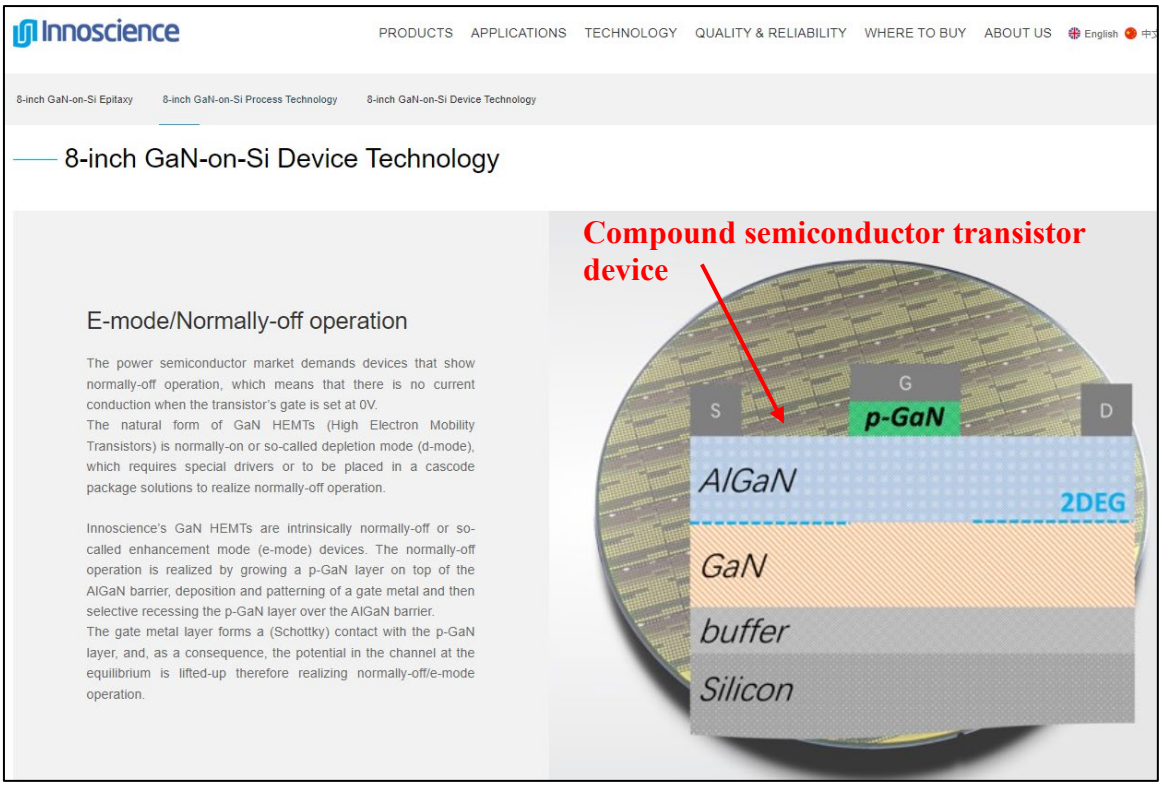
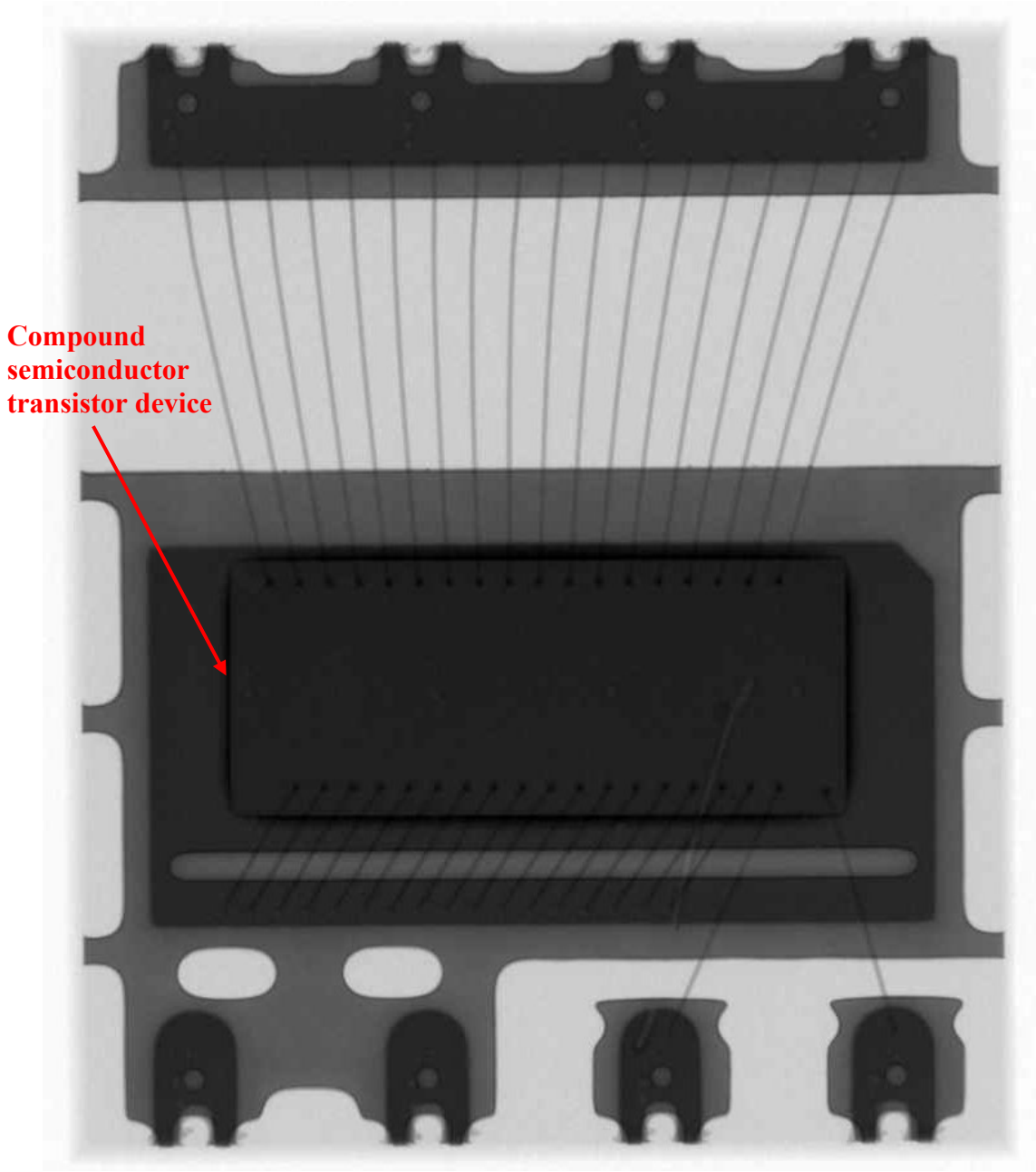
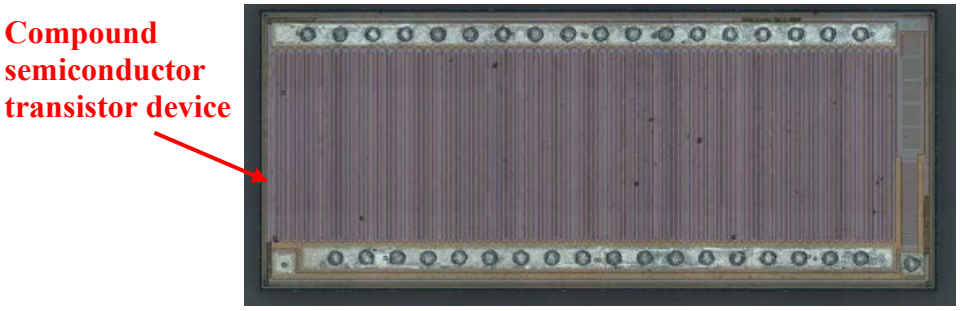


Exhibit E, https://www.innoscience.com/site/technology, at 4 (annotations added)



Plan-view X-ray photograph of INN650DA190A (annotations added)



Plan-view die photograph of INN650DA190A, without bond wires (annotations added)

54. The compound semiconductor transistor device in the Accused Products (*e.g.*, INN650DA190A) includes a first current electrode, a second current electrode and a control electrode. For example:

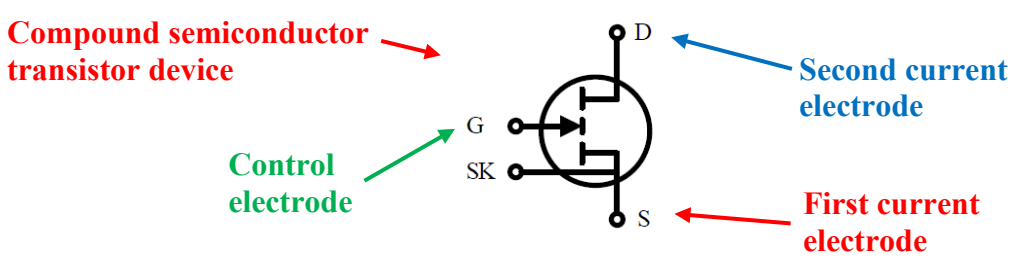
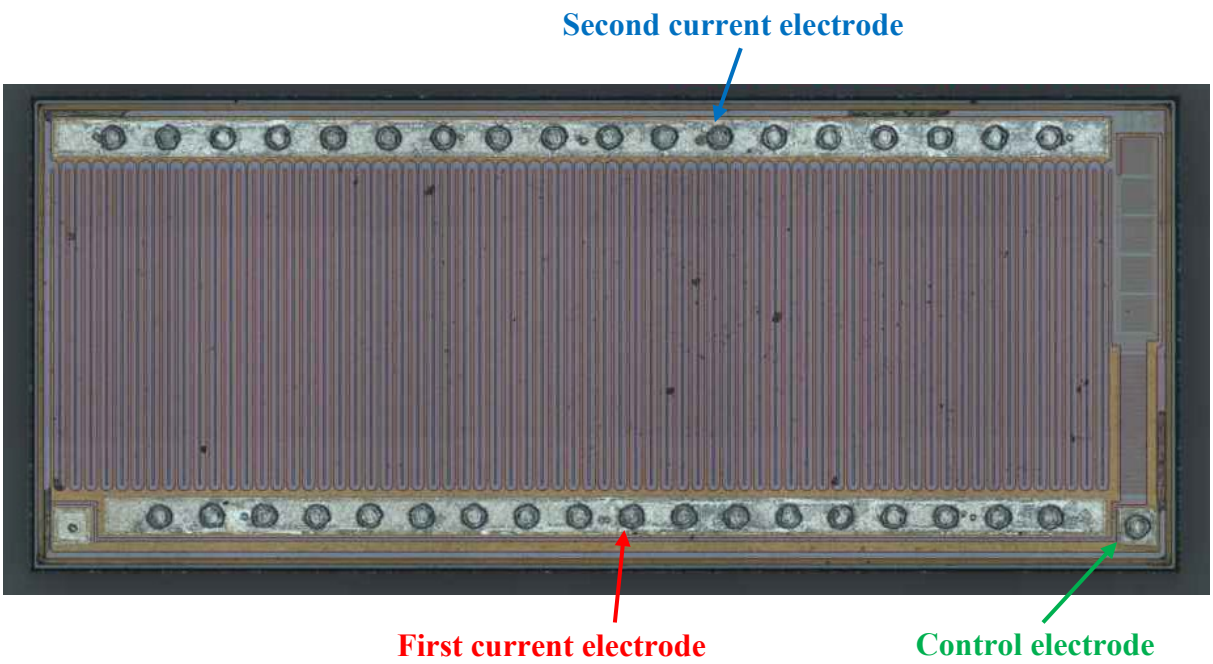
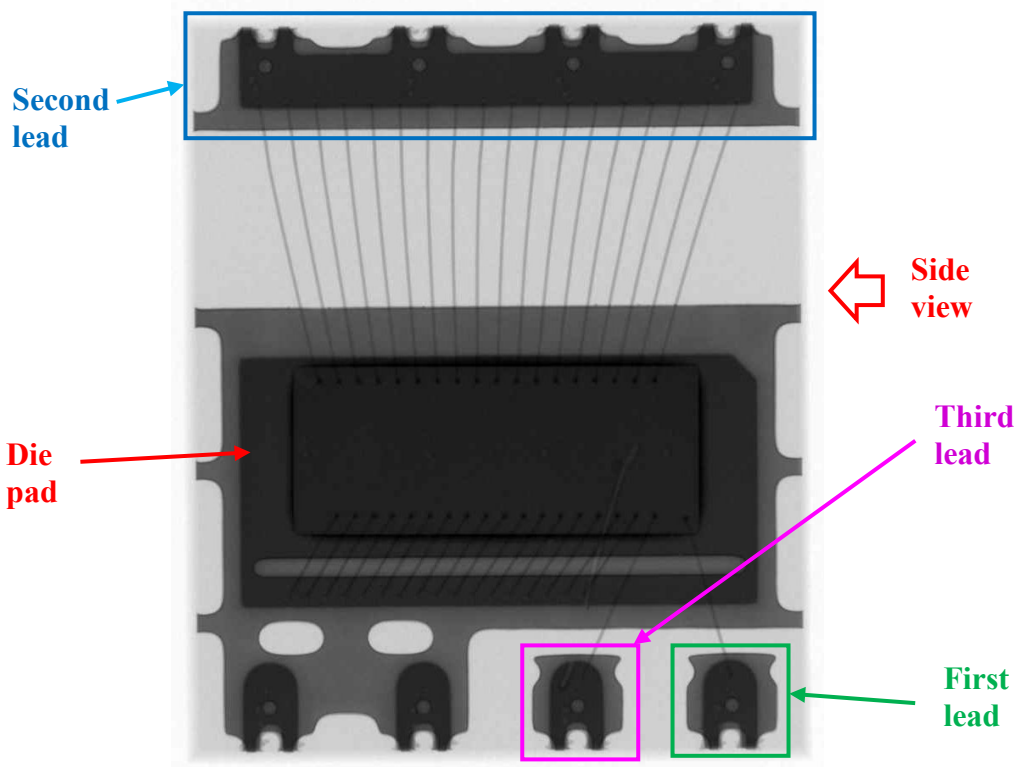


Exhibit D, INN650DA190A Datasheet, at 1 (annotations added)

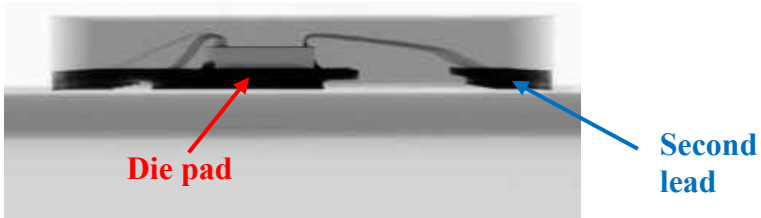


Plan-view die photograph of INN650DA190A, without bond wires (annotations added)

55. The Accused Products (e.g., INN650DA190A) include a die pad, a first lead, a second lead and a third lead. The first lead, the second lead and the third lead are spaced at a distance from the die pad. For example:



Plan-view X-ray photograph of INN650DA190A (annotations added)



Side-view X-ray photograph of INN650DA190A along the direction of the arrow marked "side view" in the plan-view X-ray photograph above (annotations added)

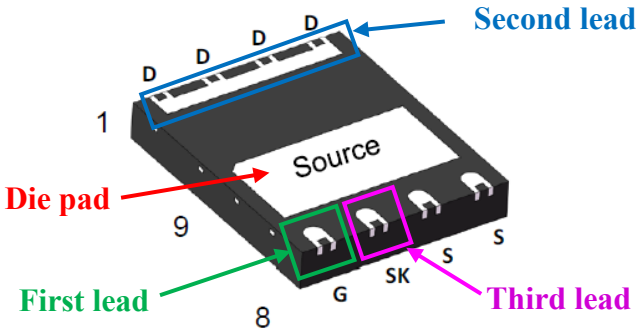
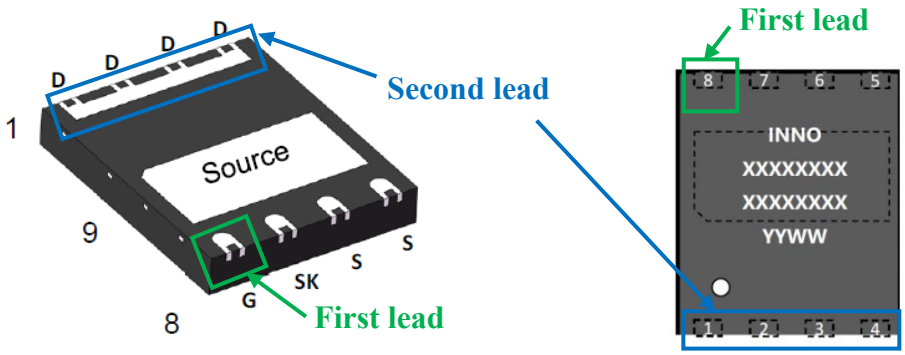


Exhibit D, INN650DA190A Datasheet, at 1 (annotations added)

56. In the Accused Products (e.g., INN650DA190A), the control electrode is coupled to the first lead, the first current electrode is coupled to the die pad, the second current electrode is coupled to the second lead. For example:



5. Pin information

Table 2 Pin information

Gate	Drain	Kelvin Source	Source
8	1,2,3,4	7	5,6,9

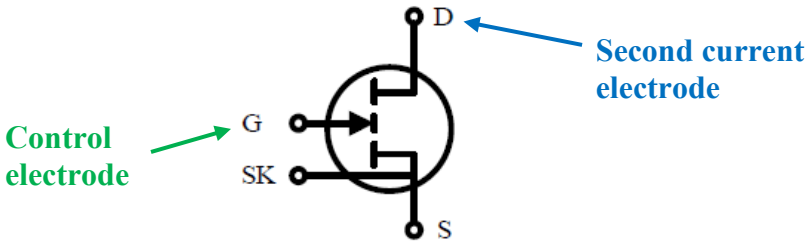
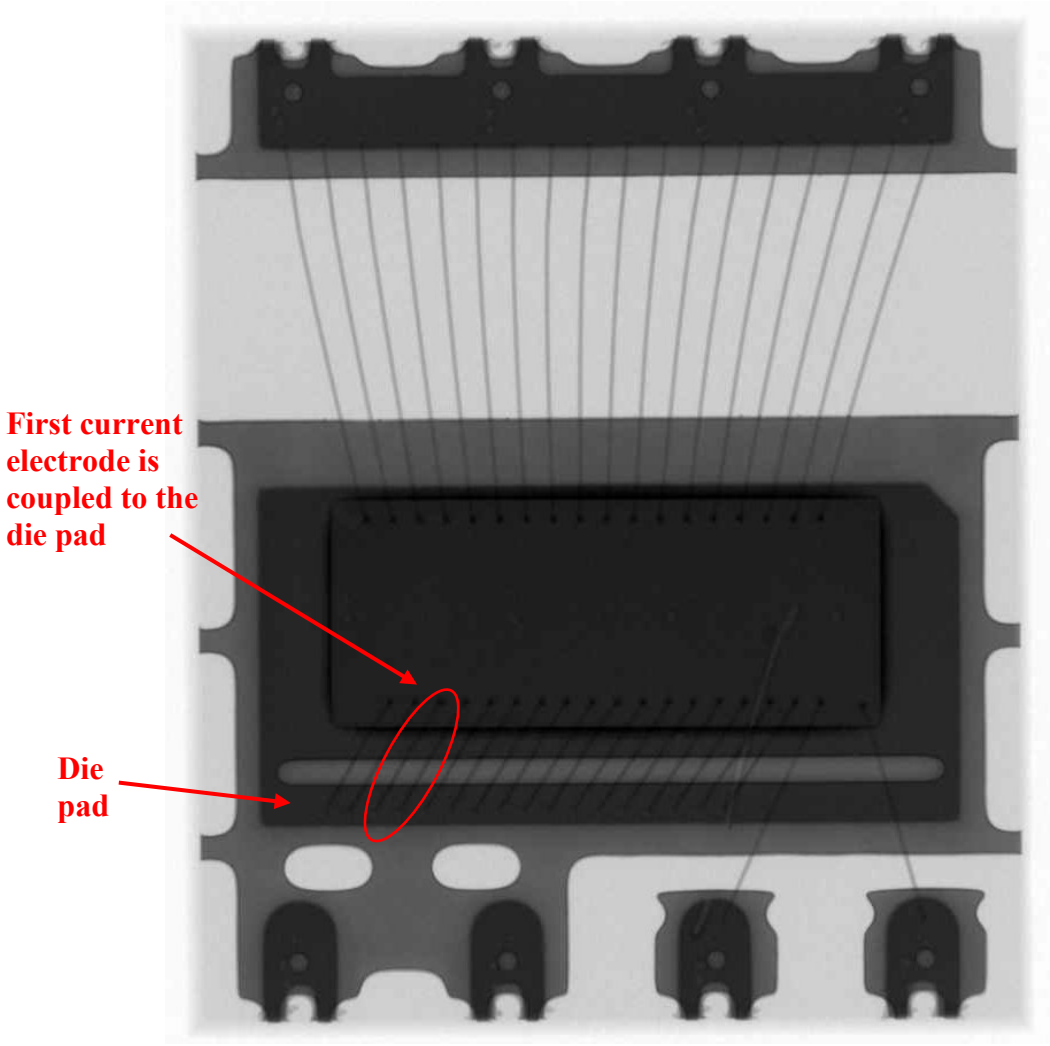
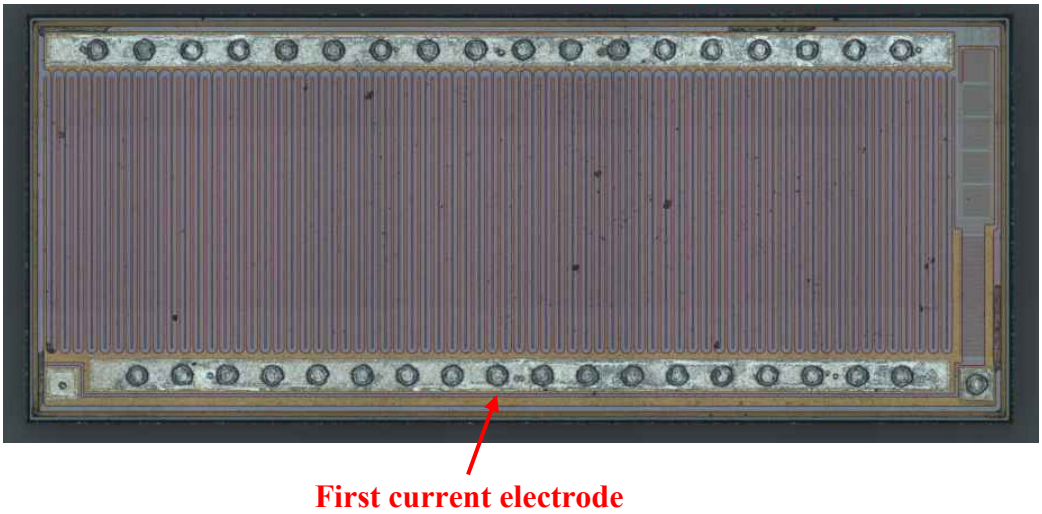


Exhibit D, INN650DA190A Datasheet, at 1, 13 (annotations added)

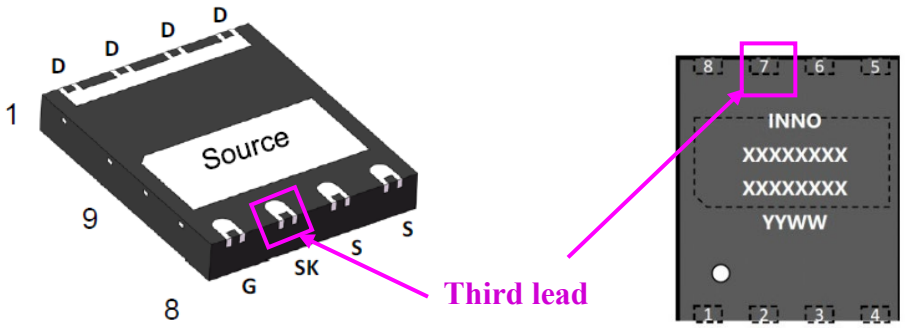


Plan-view X-ray photograph of INN650DA190A (annotations added)



Plan-view die photograph of INN650DA190A, without bond wires (annotations added)

57. In the Accused Products (e.g., INN650DA190A), the third lead is coupled to the compound semiconductor transistor device and provides a source sensing functionality. For example:



5. Pin information

Table 2 Pin information

Gate	Drain	Kelvin Source	Source
8	1,2,3,4	7	5,6,9

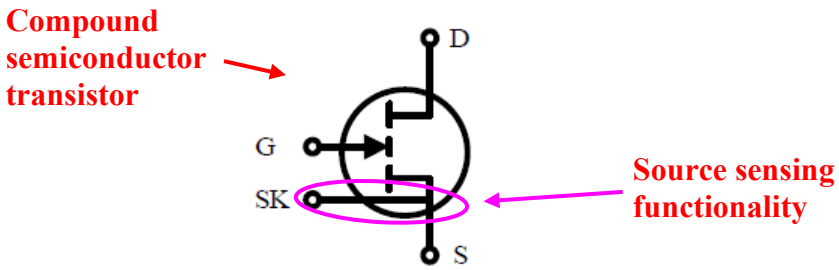


Exhibit D, INN650DA190A Datasheet, at 1, 13 (annotations added)

58. The compound semiconductor transistor device in the Accused Products (e.g., INN650DA190A) is a lateral transistor device. For example:

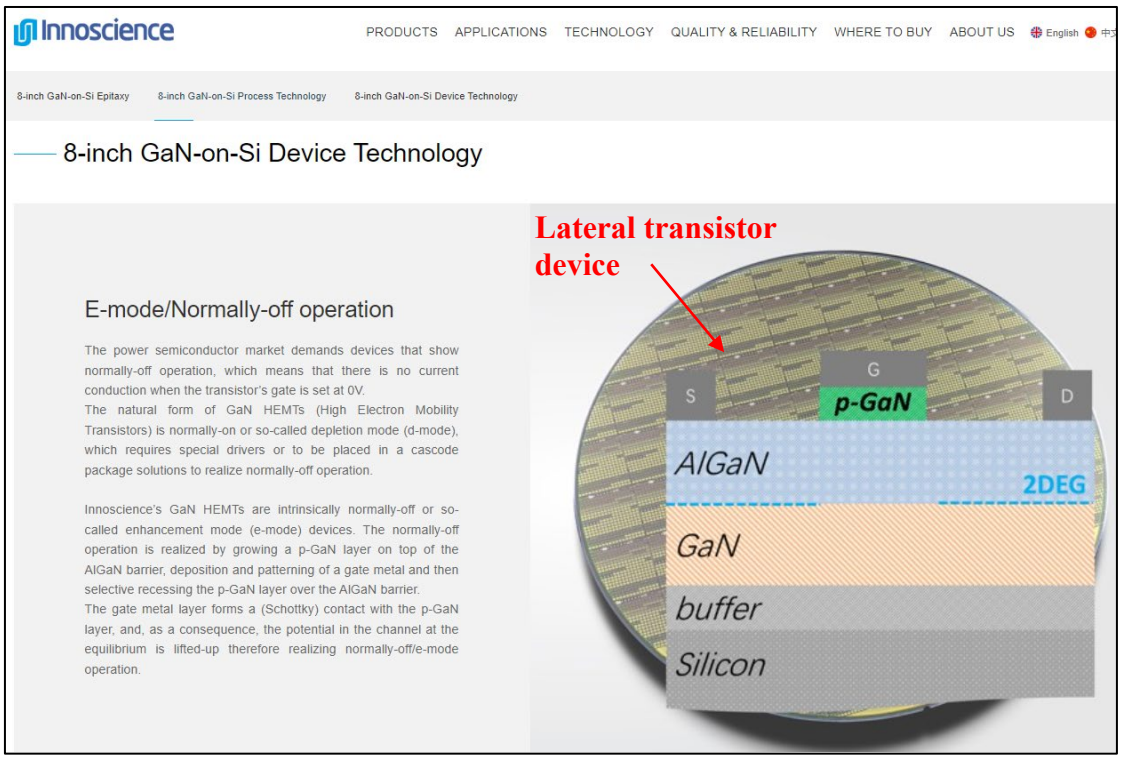
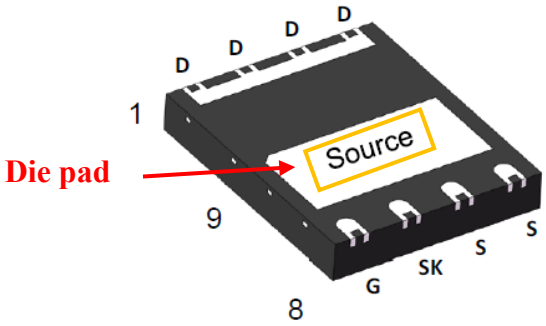


Exhibit E, https://www.innoscience.com/site/technology, at 4 (annotations added)

59. In the Accused Products (e.g., INN650DA190A), a source of the compound semiconductor transistor device is coupled to the die pad. For example:



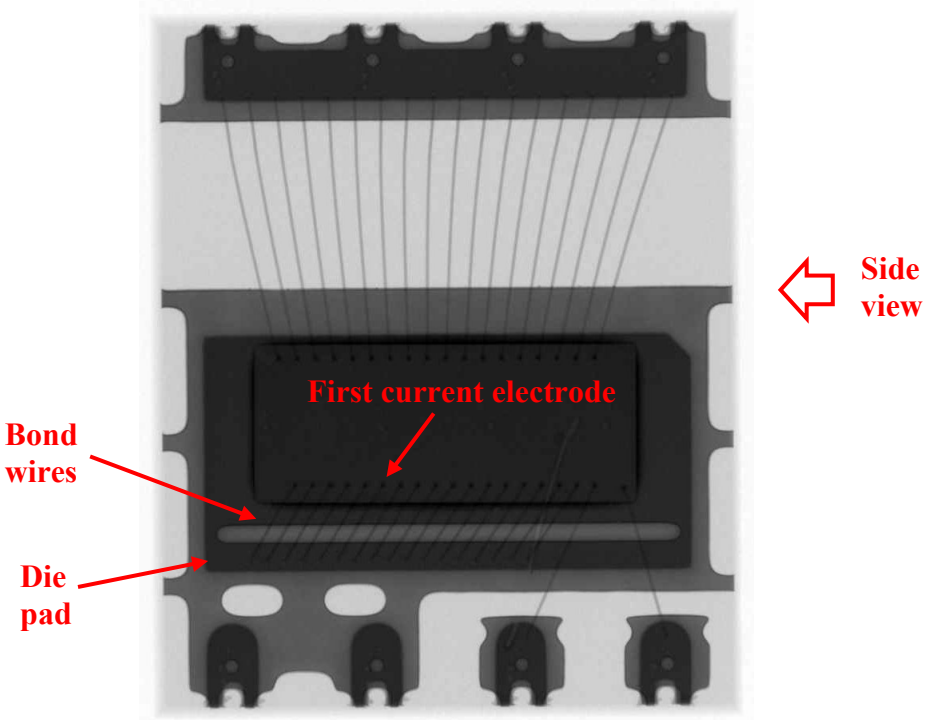
5. Pin information

Table 2 Pin information

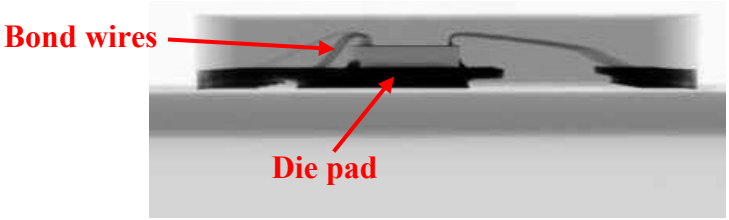
Gate	Drain	Kelvin Source	Source
8	1,2,3,4	7	5,6,9

Exhibit D, INN650DA190A Datasheet, at 1 (annotations added)

60. In the Accused Products (e.g., INN650DA190A), the first current electrode is coupled to the die pad by a plurality of bond wires. For example:



Plan-view X-ray photograph of INN650DA190A (annotations added)



Side-view X-ray photograph of INN650DA190A along the direction of the arrow marked "side view" in the plan-view X-ray photograph above (annotations added)

Induced Infringement

61. Since at least the filing of the Complaint, Defendants have known of the '481 patent.

62. Since at least the filing of the Complaint, Defendants have known that the Accused Products infringe at least claim 1 of the '481 patent when used by customers or other users, when sold or offered for sale by Innoscience America or by other resellers (e.g., Richardson RFPD), and when imported into the United States.

63. Since at least the filing of the Complaint, Innoscience America has had the specific intent to induce and has induced customers or other users to directly infringe at least claim 1 of the '481 patent by distributing the Accused Products through established channels in the United States and advertising the Accused Products in the United States.

64. Since at least the filing of the Complaint, Innoscience Suzhou and Innoscience Zhuhai have had the specific intent to induce and have induced customers or other users to directly infringe at least claim 1 of the '481 patent by continuing to make the Accused Products, distribute the Accused Products through established channels into the United States, and enable and encourage resellers (e.g., Richardson RFPD) to sell the Accused Products in the United States, including in this District.

65. Defendants provide (or cause Richardson RFPD to provide) with the Accused Products and on Innoscience's website product datasheets, demo boards, product documentation, application notes, and advertising materials that induce customers or other users to infringe at least claim 1 of the '481 patent by encouraging the use of the Accused Products. For example, Innoscience's website touts features of INN650DA190A such as "ultra high switching frequency," "low gate charge, low output charge," "qualified for industrial applications according to JEDEC Standards" for applications in "DCM/BCM PFC," "AHB/LLC/QR Flyback/ACF DCDC converter," "LED driver," "fast battery charger," "notebook/AIO adaptor," and "Desktop PC/ATX/TV/power tool power supply" (https://www.innoscience.com/site/product_details/408).

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

67. Infineon has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Innoscience's infringement of the '481 patent.

68. Innoscience's infringement of the '481 patent has damaged and continues to damage Infineon in an amount yet to be determined, of no less than a reasonable royalty.

REQUEST FOR RELIEF

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

a. Declaring that Defendants have infringed the ’481 patent;

b. Granting a permanent injunction, enjoining Defendants and their officers, agents, servants, employees, attorneys, and all other persons acting in concert or participation with them, from further infringement of the ’481 patent, including but not limited to enjoining the manufacture, sale, offer for sale, importation or use of the Accused Products and any further development of the Accused Products;

c. Awarding Infineon damages adequate to compensate it for Defendants’ 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 that this is an exceptional case and awarding Infineon its reasonable attorneys’ fees and costs incurred in this litigation; and

e. Awarding Infineon any such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

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

Dated: March 13, 2024

/s/ Karen I. Boyd

Karen I. Boyd (State Bar No. 189808)
boyd@turnerboyd.com
Megan Olesek (State Bar No. 191218)
olesek@turnerboyd.com
Zhuanjia Gu (State Bar No. 244863)
gu@turnerboyd.com
TURNER BOYD SERAPHINE LLP
155 Bovet Road, Suite 750
San Mateo, California 94402
Telephone: (650) 521-5930

Gregory F. Corbett *(pro hac vice* to be filed)
gcorbett@wolfgreenfield.com

Charles T. Steenburg *(pro hac vice* to be filed)
csteenburg@wolfgreenfield.com
Elizabeth A. DiMarco *(pro hac vice* to be filed)
edimarco@wolfgreenfield.com
Eric J. Rutt *(pro hac vice* to be filed)
erutt@wolfgreenfield.com
Jie Xiang *(pro hac vice* to be filed)
jxiang@wolfgreenfield.com
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
Telephone: (617) 646-8000

Attorneys for Plaintiff
Infineon Technologies Austria AG