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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION

14 INTERFACE LINX, LLC, a
California limited liability company,

15 Plaintiff,

16 v.

17 HAIER AMERICA COMPANY,
18 LLC, a Delaware limited liability
corporation and HAIER GROUP
19 CORPORATION, a foreign
corporation,

20 Defendants.

Lead Case No. 2:17-cv-03170-BRO-E
The Honorable Beverly R. O’Connell

**AMENDED CONSOLIDATED
COMPLAINT FOR PATENT
INFRINGEMENT**

21 INTERFACE LINX, LLC, a
California limited liability company,

22 Plaintiff,

23 v.

24 HISENSE USA CORPORATION, a
25 Georgia corporation and HISENSE
26 COMPANY LIMITED, a foreign
corporation,

27 Defendants.

Consolidated Case: 2:17-cv-03182

28

1 INTERFACE LINX, LLC, a
2 California limited liability company,
3
4 Plaintiff,
5
6 v.
7 ONKYO U.S.A. CORPORATION, a
8 Delaware corporation and ONKYO
9 CORPORATION, a foreign
10 corporation,
11
12 Defendants.

Consolidated Case: 2:17-cv-03188

13 INTERFACE LINX, LLC, a
14 California limited liability company,
15
16 Plaintiff,
17
18 v.
19 PIONEER ELECTRONICS (USA),
20 INC., a Delaware corporation and
21 PIONEER CORPORATION, a foreign
22 corporation,
23
24 Defendants.

Consolidated Case: 2:17-cv-03191

25 INTERFACE LINX, LLC, a
26 California limited liability company,
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28 Plaintiff,
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30 v.
31 SHERWOOD AMERICA, INC. d/b/a
32 SHERWOOD USA, d/b/a
33 SHERWOOD INKEL (USA), a
34 Delaware corporation; and INKEL
35 CORPORATION, a foreign
36 corporation,
37
38 Defendants.

Consolidated Case: 2:17-cv-03192

1 INTERFACE LINX, LLC, a
2 California limited liability company,
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4 Plaintiff,
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6 v.
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8 SOUND UNITED, LLC d/b/a
9 DEFINITIVE TECHNOLOGY, a
10 Delaware limited liability company;
11 POLK AUDIO, a California limited
12 liability company; DENON
13 ELECTRONICS (USA), LLC, a
14 Delaware limited liability company;
15 and MARANTZ AMERICA, LLC, a
16 Delaware limited liability company,
17
18 Defendants.

Consolidated Case: 2:17-cv-03193

19 INTERFACE LINX, LLC, a
20 California limited liability company,
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22 Plaintiff,
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24 v.
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26 TTE TECHNOLOGY, INC. d/b/a
27 TCL USA, a Delaware corporation
28 and TCL MULTIMEDIA
HOLDINGS, LTD., a foreign
corporation,
Defendants.

Consolidated Case: 5:17-cv-00826

19 INTERFACE LINX, LLC, a
20 California limited liability company,
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22 Plaintiff,
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24 v.
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26 VOXX INTERNATIONAL
27 CORPORATION d/b/a ADVENT, a
28 Delaware corporation; VOXX
ELECTRONICS CORPORATION, a
Delaware corporation; INVISION
AUTOMOTIVE SYSTEMS INC., a
Delaware corporation; and KLIPSCH
GROUP, INC., an Indiana corporation,
Defendants.

Consolidated Case: 2:17-cv-03194

1 For its Amended Consolidated Complaint¹ against Haier America Company,
2 LLC, Haier Group Corporation, Hisense USA Corporation, Hisense Company
3 Limited, Onkyo U.S.A. Corporation, Onkyo Corporation, Pioneer Electronics
4 (USA), Inc., Pioneer Corporation, Sherwood America, Inc., Inkel Corporation,
5 Sound United, LLC d/b/a Definitive Technology, Denon Electronics (USA), LLC,
6 Marantz America, LLC, Polk Audio, LLC, TTE Technology, Inc. d/b/a TCL USA,
7 TCL Multimedia Holdings, Ltd., Voxx International Corporation d/b/a Advent,
8 Voxx Electronics Corporation, Invision Automotive Systems Inc., and Klipsch
9 Group, Inc. (collectively the “Defendants” and/or “each Defendant”), Plaintiff
10 Interface Linx, LLC alleges as follows:

11 **THE PARTIES**

12 1. Plaintiff Interface Linx, LLC (“Interface” or “Plaintiff”) is a
13 California limited liability company having a principal place of business at 35 Hugus
14 Alley, Suite 210, Pasadena, CA 91103.

15 2. On information and belief, Haier Group Corporation (“Haier Corp”) is
16 organized under the laws of the People’s Republic of China and has its principal
17 place of business at 1 Haier Rd., Hi-Tech Zone, Qingdao, Shandong 266101,
18 People’s Republic of China.

19 3. On information and belief, Haier America Company, LLC (“Haier
20 USA”) is a wholly-owned subsidiary of Haier Corp, and is a limited liability
21 company organized under the laws of Delaware and has its principal place of
22 business at 1800 Valley Road, Wayne, NJ 07470 and has appointed Corporation
23 Service Company, 2711 Centerville Rd Suite 400, Wilmington, DE 19808, as its
24 agent for service of process. Throughout this pleading, and unless specifically noted
25 otherwise, Defendants Haier Corp and Haier USA will be referenced collectively as
26

27 ¹ On May 8, 2017, the Court ordered Plaintiff to file an amended
28 consolidated complaint. *See* Dkt. 15.

1 the “Haier Defendants.”

2 4. On information and belief, Hisense Company Limited (“Hisense”) is a
3 corporation organized under the laws of China and has its principal place of business
4 at Haixing Building No. 17 Donghai Road, 266071 Qingdao 266071 Shandong,
5 China.

6 5. On information and belief, Hisense USA Corporation (“Hisense
7 USA”) is a wholly-owned subsidiary of Hisense, and is a corporation organized
8 under the laws of Georgia and has its principal place of business at 7310 McGinnis
9 Ferry Road, Suwanee, GA 30024 and has appointed Bin Liu, 7310 McGinnis Ferry
10 Road, Gwinnett, Suwanee, GA, 30024, as its agent for service of process.

11 Throughout this pleading, and unless specifically noted otherwise, Defendants
12 Hisense and Hisense USA will be referenced collectively as the “Hisense
13 Defendants.”

14 6. On information and belief, Onkyo Corporation (“Onkyo Corp”) is
15 organized under the laws of Japan and has a principal place of business at 2-1,
16 Nissin-cho, Neyagawa-shi, Osaka, 572-8540 Japan.

17 7. On information and belief, Onkyo U.S.A. Corporation (“Onkyo
18 USA”) is a wholly-owned subsidiary of Onkyo Corp, and is a corporation organized
19 under the laws of Delaware and has its principal place of business at 18 Park Way,
20 Upper Saddle River, New Jersey 07458 and has appointed Corporation Service
21 Company, at 2711 Centerville Rd., Suite 400, Wilmington, DE 19808, as its agent
22 for service of process. Throughout this pleading, and unless specifically noted
23 otherwise, Defendants Onkyo Corp and Onkyo USA will be referenced collectively
24 as the “Onkyo Defendants.”

25 8. On information and belief, Pioneer Corporation (“Pioneer Corp”) is a
26 corporation organized under the laws of Japan and has its principal place of business
27 at 28-8, Honkomagome 2-chome, Bunkyo-ku, Tokyo 113-0021, Japan.

28 9. On information and belief, Pioneer Electronics (USA), Inc.,

1 (“Pioneer USA”) is a wholly-owned subsidiary of Pioneer Corp, and is a corporation
2 organized under the laws of Delaware and has its principal place of business at 1925
3 E. Dominguez Street, Long Beach, California 90810 and has appointed CSC -
4 Lawyers Incorporating Service, 2710 Gateway Oaks Dr Ste 150N, Sacramento CA
5 95833, as its agent for service of process. Throughout this pleading, and unless
6 specifically noted otherwise, Defendants Pioneer Corp and Pioneer USA will be
7 referenced collectively as the “Pioneer Defendants.”

8 10. On information and belief, Inkel Corporation (“Inkel”) is a South
9 Korean corporation with a principal place of business at 3-8, Cheongcheon-Dong,
10 Bupyeong-Gu, Incheon, 4.3-853, South Korea and a place of business at 1301
11 Moore St., Fullerton, CA 92831.

12 11. On information and belief, Sherwood America, Inc. (“Sherwood”) is
13 an owned subsidiary of Inkel, and is a corporation organized under the laws of
14 Delaware and has its principal place of business at 4325 Executive Drive, Suite 300,
15 Southaven, MS 38672 and has appointed The Corporation Trust Company at
16 Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801, as its agent
17 for service of process. Throughout this pleading, and unless specifically noted
18 otherwise, Defendants Inkel and Sherwood will be referenced collectively as the
19 “Inkel Defendants.”

20 12. On information and belief, Sound United, LLC (“Sound United”) is a
21 limited liability company organized under the laws of Delaware and has its principal
22 place of business at 1 Viper Way, Vista, CA 92081 and has appointed Crystal L.
23 Biggs, 1 Viper Way, Vista, CA 92081, as its agent for service of process.

24 13. On information and belief, Polk Audio, LLC (“Polk Audio”) is a
25 wholly-owned subsidiary of Sound United, and is a California limited liability
26 company with a principal office located at 1 Viper Way, Vista, CA 92081 and has
27 appointed Crystal L. Biggs, 1 Viper Way, Vista, CA 92081, as its agent for service
28 of process.

1 14. On information and belief, Denon Electronics (USA), LLC (“Denon”)
2 is a wholly-owned subsidiary of Sound United, and is a limited liability company
3 organized under the laws of Delaware and has its principal place of business at 100
4 Corporate Drive, Mahwah, NJ 07430 and has appointed The Corporation Trust
5 Company, Corporation Trust Center 1209 Orange St., Wilmington, DE 19801, as its
6 agent for service of process.

7 15. On information and belief, Marantz America, LLC (“Marantz”) is a
8 wholly-owned subsidiary of Sound United, and is a limited liability company
9 organized under the laws of Delaware and has its principal place of business at 100
10 Corporate Drive, Mahwah, N.J. 07430-2041 and has appointed The Corporation
11 Trust Company, Corporation Trust Center 1209 Orange St., Wilmington, DE 19801,
12 as its agent for service of process. Throughout this pleading, and unless specifically
13 noted otherwise, Defendants Sound United, Polk Audio, Denon, and Marantz will be
14 referenced collectively as the “Sound United Defendants.”

15 16. On information and belief, TCL Multimedia Holdings, Ltd. (“TCL”)
16 is a limited liability company organized under the laws of the Cayman Islands and
17 has its principal place of business at 13/F TCL Tower, 8 Tai Chung Road, Tsuen
18 Wan New Territories, Hong Kong SAR, China.

19 17. On information and belief, TTE Technology, Inc. d/b/a TCL USA
20 (“TCL USA”) is a wholly-owned subsidiary of TCL, and is a corporation organized
21 under the laws of Delaware and has its principal place of business at 2455 Anselmo
22 Drive, Suite 101, Corona, CA 92879 and has appointed Business Filings
23 Incorporated, 108 West 13th Street, Wilmington, DE 19801, as its agent for service
24 of process. Throughout this pleading, and unless specifically noted otherwise,
25 Defendants TCL and TCL USA will be referenced collectively as the “TCL
26 Defendants.”

27 18. On information and belief, Voxx International Corporation,
28 (“Voxx”) is a corporation organized under the laws of Delaware and has its

1 principal place of business at 180 Marcus Blvd., Hauppauge, NY 11788 and has
2 appointed Corporation Service Company, 2710 Gateway Oaks Dr., Suite 150N,
3 Sacramento, CA 95833, as its agent for service of process.

4 19. On information and belief, Voxx Electronics Corporation (“VEC”)
5 is a wholly-owned subsidiary of Voxx, and is a corporation organized under the
6 laws Delaware and has its principal place of business at 150 Marcus Blvd.,
7 Hauppauge, NY 11788 and has appointed Corporation Service Company, doing
8 business as CSC – Lawyers Incorporating Service, 2710 Gateway Oaks Dr., Suite
9 150N, Sacramento, CA 95833, as its agent for service of process.

10 20. On information and belief, Invision Automotive Systems Inc.
11 (“Invision”) is a wholly-owned subsidiary of Voxx, and is a Delaware
12 corporation, with its principal place of business at 150 Marcus Blvd., Hauppauge,
13 NY 11788 and has appointed Corporation Service Company, doing business as
14 CSC - Lawyers Incorporating Service, 2710 Gateway Oaks Dr., Suite 150N,
15 Sacramento, CA 95833, as its agent for service of process.

16 21. On information and belief, Klipsch Group, Inc. (“Klipsch”) is a
17 wholly-owned subsidiary of Voxx, and is a corporation organized under the laws
18 of Indiana, with a principal place of business of 3502 Woodview Trace, Suite
19 200, Indianapolis, Indiana 46268 and has appointed Corporation Service
20 Company, 2900 SW Wanamaker Drive, Suite 204, Topeka, Kansas 66614, as its
21 agent for service of process. Throughout this pleading, and unless specifically
22 noted otherwise, Defendants Voxx, VEC, Invision, and Klipsch will be
23 referenced collectively as the “Voxx Defendants.”

24 **JURISDICTION AND VENUE**

25 22. This is a civil action for patent infringement arising under the Patent
26 Act of the United States, 35 U.S.C. §§ 1 *et seq.* This court has subject matter
27 jurisdiction of such federal question claims pursuant to 28 U.S.C. §§ 1331 and
28 1338(a).

1 29. Defendants make, use and sell, within the United States, a plurality of
2 electrical connector assemblies which are integrated into a diverse class of electronic
3 products that infringe the '678 Patent (collectively referred to hereinafter as
4 "Accused Systems"), and which are designed to the specifications of HDMI Type A.

5 30. The electrical connector assembly of claim 1 offers significant
6 improvements in plug and receptacle design, which greatly improve ease of
7 connectivity and the potential for data transfer once the connection is made. The
8 physical design, envisioned with great specificity by the '678 Patent, offered such
9 improvements over the prior art that the HDMI standards utilized this design to
10 create the Type A plug and receptacle found on the vast majority of electronic
11 devices today.

12 31. Defendants make and sell products that utilize the electrical connector
13 assembly of the '678 Patent. These Accused Systems include, for example and
14 without limitation, Haier Defendants' televisions, such as the 50" Class LED HDTV
15 50E3500, Hisense Defendants' televisions, such as the 65" Class H10 Series Curved
16 4K Quantum Dot ULED Smart TV, Onkyo Defendants' A/V Receivers, such as the
17 TX-RZ810 7.2-Channel network A/V Receiver; Onkyo Defendants' Home Theater
18 Systems, such as the HT-S5800 5.1.2-Channel Dolby Atmos Home Theater System;
19 Onkyo Defendants' Blu-ray Players, such as the BD-SP809 Blu-ray Disc Player;
20 Onkyo Defendants' Soundbars, such as the SBT-A500 Object-Based Network
21 Surround Sound Bar; Onkyo Defendants' Preamplifiers, such as the PR-RZ5100
22 11.2-Ch Network A/V Controller, Pioneer Defendants' A/V Receivers, such as the
23 SC-LX801 9.2-ch Class D³ Network AV Receiver; Pioneer Defendants' Vehicle
24 Receivers, such as the AVIC-8201NEX Flagship In-Dash Navigation AV Receiver
25 with 7" WVGA Capacitive Touchscreen Display and included ND-BC8 Back-Up
26 Camera; Pioneer Defendants' Blu-ray Players, such as the BDP-80FD Elite 3D-
27 Compatible Streaming Blu-ray Disc™ Player, Sherwood Defendants' Sound
28 Systems, such as the S-9 3D Sound Bar System; Sherwood Defendants' A/V

1 Receivers, such as the R-807 World 1st 7.1ch A/V Receiver with WiFi-Direct;
2 Sherwood Defendants' Blu-Ray Players, such as the BDP-904 Full HD Blu-Ray
3 Player with BD Profile 2.0, Sound United Defendants' Soundbars, such as the W
4 Studio Sound Bar System with Wireless Streaming; Sound United Defendants'
5 Soundbars, such as the MagniFi mini Home Theater Sound Bar System; Sound
6 United Defendants' A/V Receivers, such as the AVR-X7200WA 9.2 Channel Full
7 4K Ultra HD AV Receiver; Sound United Defendants' A/V Receivers, such as the
8 SR7011 9.2 Channel Full 4K Ultra HD AV Surround Receiver with Bluetooth and
9 Wi-Fi; Sound United Defendants' A/V Separates, such as the AV8802A Network
10 A/V Preamplifier, TCL Defendants' televisions, such as the 55" LED UHD TV
11 55US5800, Voxx Defendants' Vehicle A/V products, such as the 12.1" Digital Hi-
12 Def Overhead Monitor System with DVD and HD Inputs ADVEXL12A; Voxx
13 Defendants' Vehicle A/V products, such as the Audiovox VODEXL10A 10.1-inch
14 Hi-Def digital overhead system; Voxx Defendants' Vehicle A/V products, such as
15 the INVISION ConnectedHD 8" Headrest System HR8D; and Voxx Defendants'
16 Soundbars, such as the Klipsch Reference RSB-14 Sound Bar.

17 32. Defendants' Accused Systems are designed with the first element of
18 claim 1. Specifically, Defendants' Accused Systems require both plugs and
19 receptacles to form the electrical connector assembly and transfer data, including
20 audio and video, over the HDMI connection. This plug must include plug housing
21 with the mating portion within, the mating portion defined by a multi-sided
22 confining wall. An example of this plug can be found at Haier Defendants' website
23 <http://www.haier.com/pk/products/tv/led-tv/le32b9000.shtml>, as shown below:

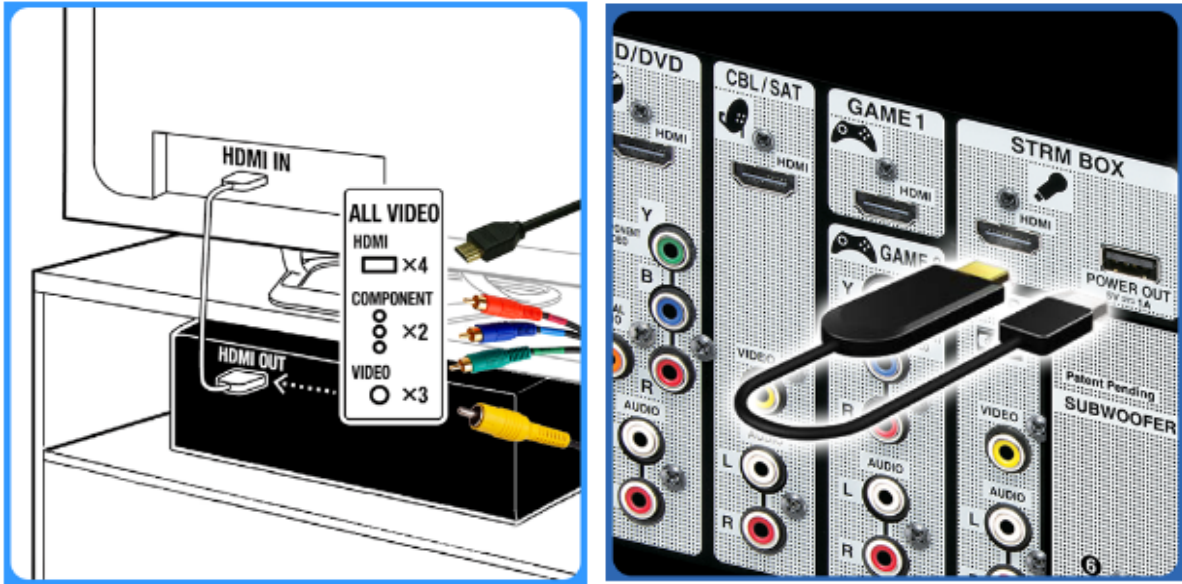


1 33. Another example of this plug can be found at Hisense Defendants'
2 website
3 <http://mai.hisense.com/commodity/%E7%A7%8B%E5%8F%B6%E5%8E%9F%E6%95%B0%E5%AD%97%E9%AB%98%E6%B8%85hdmi2%E7%B1%B3q539/>, as
4 shown below:
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21 34. Another example of this plug can be found at Onkyo Defendants'
22 website [http://www.onkyousa.com/Products/model.php?m=TX-](http://www.onkyousa.com/Products/model.php?m=TX-SR444&class=Receiver&source=prodClass)
23 [SR444&class=Receiver&source=prodClass](http://www.onkyousa.com/Products/model.php?m=TX-SR444&class=Receiver&source=prodClass), as shown below:
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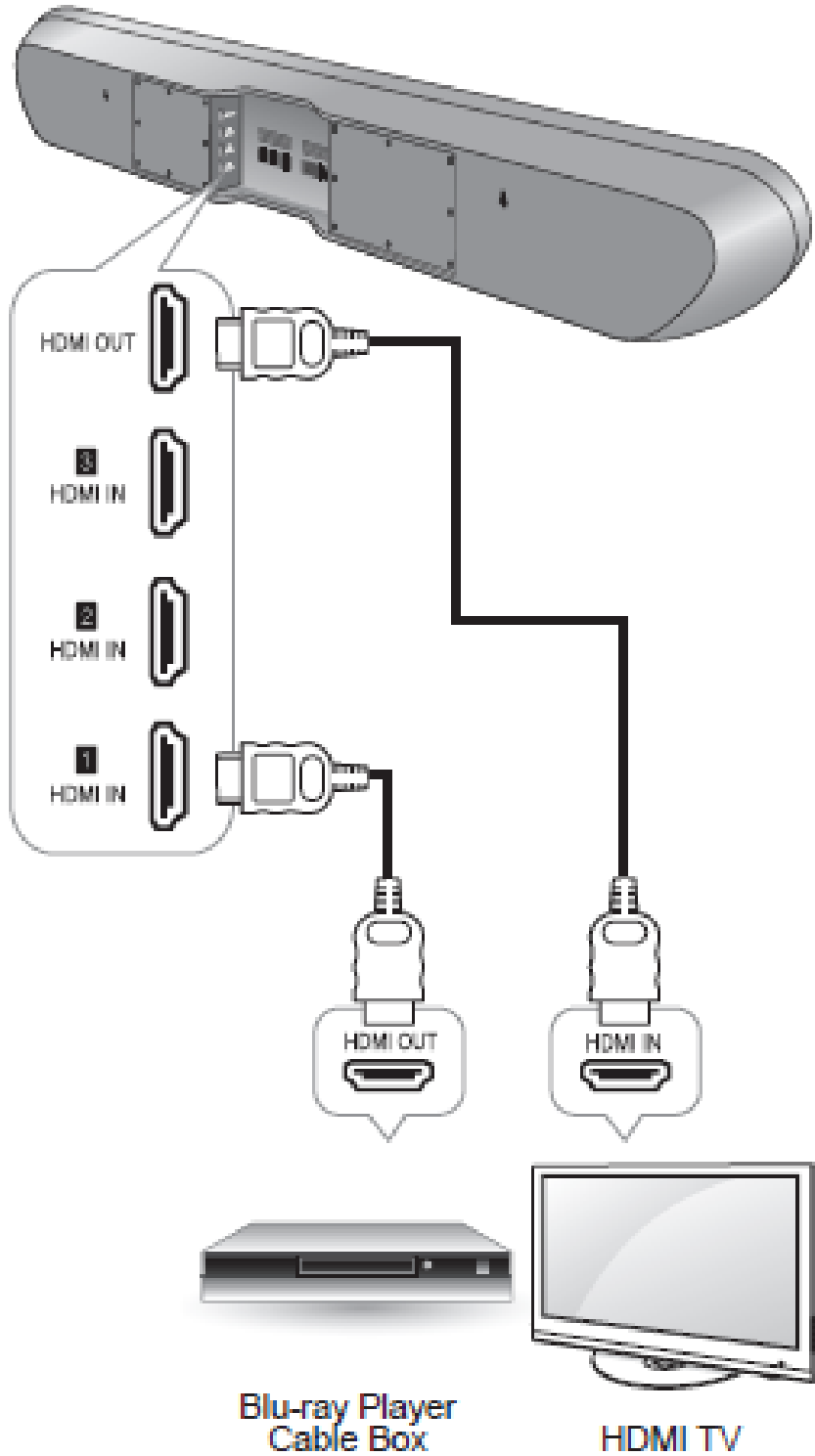
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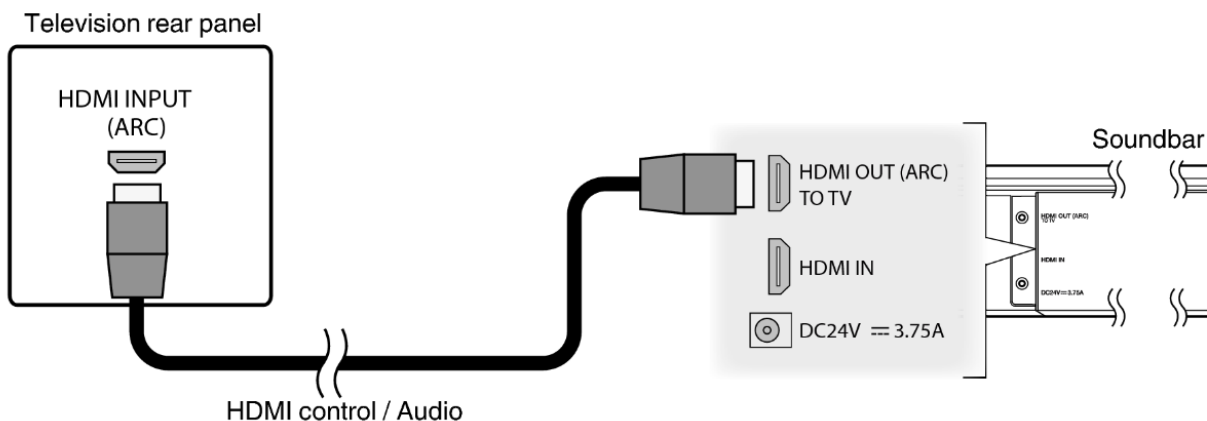
35. An example of this plug can be found at Pioneer Defendants' website <http://www.pioneerelectronics.com/PUSA/Car/Accessories/Smartphone-and-iPod-Cables/CD-IH202>, as shown below:



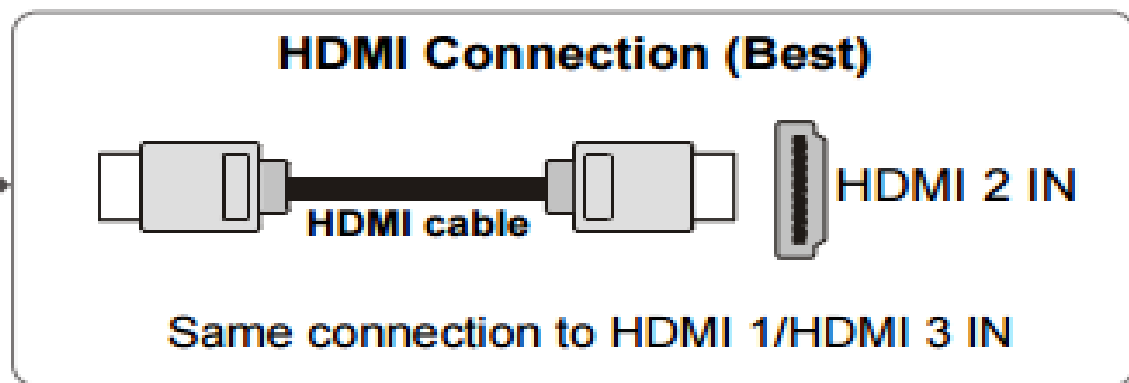
1 36. Another example of this plug can be found at Sherwood Defendants'
2 website <http://www.sherwoodusa.com/inc/download.asp>, as shown below:



1 37. Another example of this plug can be found at Sound United
2 Defendants' website
3 <http://manuals.denon.com/HEOSHC/ALL/EN/DRDZSYlybwyfra.php>, as shown
4 below:



13 38. Another example of this plug can be found at TCL Defendants'
14 website http://www.tclusa.com/downloads/IB_E3010_32_39_40.pdf and
15 <http://www.tclusa.com/archivedmodels/le42fhde5300/>, as shown below:



1 39. Another example of this plug can be found at Voxx Defendants'
2 website <http://www.acoustic-research.com/platinum-series-hdmi/>, as shown below:



17 40. Defendants' Accused Systems are further designed with the second
18 element of claim 2. Specifically, Defendants' Accused Systems require both plugs
19 and receptacles to form the electrical connector assembly and transfer data,
20 including audio and video, over the HDMI connection. This receptacle must include
21 a mating portion with terminals mounted inside within, the mating portion defined
22 by a multi-sided confining wall. An example of this receptacle can be found at
23 Haier Defendants' website <http://www.haieramerica.com/product/50e3500>, as
24 shown below:

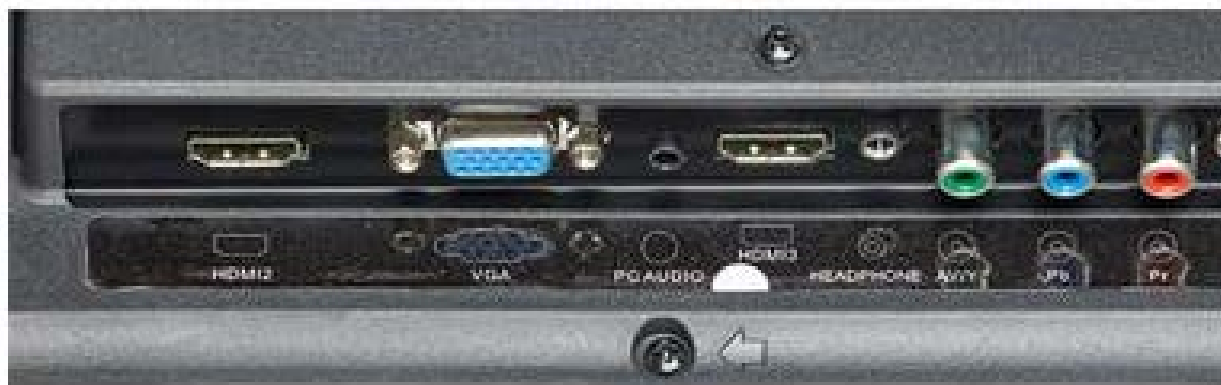
25 **Range of Inputs**

26 Includes multiple A/V inputs, including three HDMI
27 and one USB port
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Hdmi Inputs

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41. Another example of this receptacle can be found at Hisense Defendants' website <https://www.hisense-usa.com/electronics/tv/65h10b2>, as shown below:

 ports

HDMI (MHL, ARC, CEC I up to 60fps)
4 (2x HDMI v2.0 / HDCP 2.2 | 2x HDMI v1.4 / HDCP 1.4)



1 42. Another example of this receptacle can be found at Onkyo
2 Defendants' website [http://www.onkyousa.com/Products/model.php?m=TX-](http://www.onkyousa.com/Products/model.php?m=TX-RZ810&class=Receiver&source=prodClass)
3 [RZ810&class=Receiver&source=prodClass](http://www.onkyousa.com/Products/model.php?m=TX-RZ810&class=Receiver&source=prodClass), as shown below:

- 4 • 8 HDMI In (1 Front/7 Rear)
- 5 • 2 HDMI Out (Main & Zone 2/Sub)



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16 43. Another example of this receptacle can be found at Pioneer
17 Defendants' website <http://www.pioneerelectronics.com/PUSA/Home/AV->
18 [Receivers/Elite+Receivers/SC-LX801](http://www.pioneerelectronics.com/PUSA/Home/AV-), as shown below:

19
20 **HDMI Input / Output** 8 In (7 Rear, 1 Front) / 2 Out



1 44. An example of this receptacle can be found at Sherwood Defendants'
2 website <http://www.sherwoodusa.com/product/view.asp>, as shown below:

3 - 3In/1Out HDMI Repeater (3D/ARC/CEC)
4



1 45. An example of this receptacle can be found at Sound Audio
2 Defendants' website <https://www.definitivetech.com/products/w-studio> and
3 <http://www.soundguys.com/definitive-w-studio-review-4219/>, as shown below:

- 4
- 5 • Versatile connections with three HDMI inputs, one digital optical input
6 and more

7 Audio Inputs

• HDMI

8 Audio Outputs

• HDMI (Audio)



1 46. Another example of this receptacle can be found at Sound United
2 Defendants' website <https://www.polkaudio.com/products/magnifimini>, as shown
3 below:




12 47. An example of this receptacle can also be found at Sound United
13 Defendants' website
14 <https://usa.denon.com/us/product/hometheater/receivers/avr7200wa>, as shown
15 below:

16 The advanced video section features the ability to handle next
17 generation 4K Ultra HD 60 Hz video, with all rear panel HDMI inputs
18 conforming to the latest HDMI 4K 50/60 Hz specification. 4:4:4 Pure
19 Color pass-through is also provided, for compatibility with forthcoming
20 high color resolution 4K Ultra HD content.

21 There are 3 HDMI outputs (2 for the main room including 1 with Audio
22 Return Channel and 1 for the second zone) that let you enjoy 2 different
23 sources in 2 different rooms at the same time

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HDMI

HDMI Inputs: Back / Front 7 / 1

HDCP 2.2 support

✓

HDMI Outputs: Main / Zone 2 / 1



1 48. Another example of this receptacle can also be found at Sound United
 2 Defendants' website

3 <http://www.us.marantz.com/us/Products/Pages/ProductDetails.aspx?CatId=AVReceivers&SubCatId=0&ProductId=SR7011>, as shown below:
 4

5

6 **HDMI Inputs: Back / Front 7 / 1**

7

8 **HDCP2.2 Support 0**

9

10 **HDMI Outputs: Main / Zone 2 / 1**

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21 49. An example of this receptacle can be found at TCL Defendants'
 22 website <http://www.tclusa.com/currentmodels/55us5800/>, as shown below:
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25 **Connections & Networking**

26 **HDMI® (2.0 Inputs w/ HDCP 2.2) 4 (1 ARC)**

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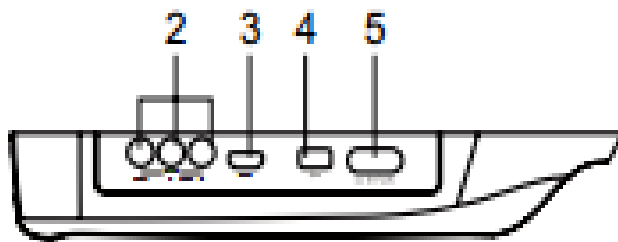


50. An example of this receptacle can be found at Voxx Defendants' website and materials <http://www.adventproducts.com/mobile-video/overheads/?sku=ADVEXL12A> and http://www.adventproducts.com/docs/common/ADVEXL12A/ADVEXL12A_OM.pdf, as shown below:



HDMI 1 & HDMI 2

The HDMI inputs allow the user to enjoy high-definition digital images and high-quality sound by connecting a HD device such as a Blu-ray player or smartphone with an HDMI output to the system. The HDMI inputs also allow the user to connect with a Mobile High-Definition Link (MHL) mobile phone. Plug in the HDMI/MHL device with a special adapter available from your mobile phone provider. See page 30 for more information.



3. HDMI/MHL 1 INPUT

For connection of devices with HDMI/MHL outputs. See page 30 for more information.

Note: Requires a HDMI/MHL enabled device and a special HDMI/MHL adapter. Contact your HDMI/MHL device supplier for the adapter.

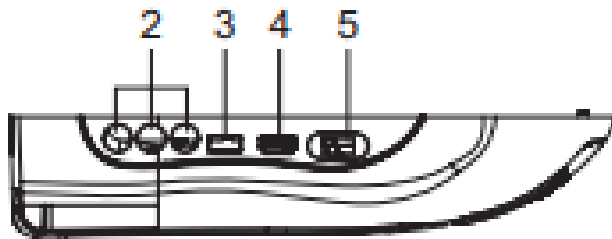
51. Another example of this receptacle can be found at Voxx Defendants' website and materials <http://www.voxxelectronics.com/mobile-video/?sku=VODEXL10A> and http://www.voxxelectronics.com/docs/common/VODEXL10A/VODEXL10A_OM.pdf, as shown below:

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- 1 User accessible and 1 Hidden HDMI/MHL Input (Hidden HDMI/MHL Input requires optional pigtail harness (HDIP1))

The VODEXL10A 10.1-inch Hi-Def digital overhead system will transform any backseat into a traveling entertainment center featuring HDMI/MHL inputs that give the user direct connection to any HDMI/MHL enabled device: smart phones, tablets, even Smart-TV devices. Audiovox is delivering more choices in device connectivity, more capability to enhance entertainment and more value than ever before. The VODEXL10A Overhead system incorporates certified HDMI/MHL inputs, giving you direct connection to any HDMI/MHL enabled device: smart phones, tablets, even Smart-TV devices. Our mobile video products provide delivery of high-definition audio and video content without losing the use of the DVD, making your entertainment possibilities literally endless. This system also features 10.1-inch Hi-Def digital, M1/M2 operations (when 2 units are installed in one vehicle), built-in 100 channel FM modulator with FM transmitter functions and 2 wireless fold flat headphones.



4. HDMI/MHL 1 INPUT

For connection of devices with HDMI/MHL outputs. See page 30 for more information.

HDMI 1 & HDMI 2

The HDMI inputs allow the user to enjoy high-definition digital images and high-quality sound by connecting a HD device such as a Blu-ray player or smartphone with an HDMI output to the system. The HDMI inputs also allow the user to connect with a Mobile High-Definition Link (MHL) mobile phone.

52. Another example of this receptacle can also be found at Voxx Defendants' website and materials <http://www.invisiondirect.com/HD-8/> and http://www.invisiondirect.com/docs/common/INV8HH01/INV8HH01_OM.pdf, as shown below:

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8" DUAL DVD HDMI FACTORYMATCH REPLACEMENT HEADREST SYSTEM

INVISION continues to focus on providing greater connectivity for an enhanced rear seat entertainment experience. Our premium headrest and overhead products come with built-in HDMI/MHL inputs, delivering unlimited options in high-definition content delivery without having to sacrifice traditional DVD viewing. Of course, these new products have been

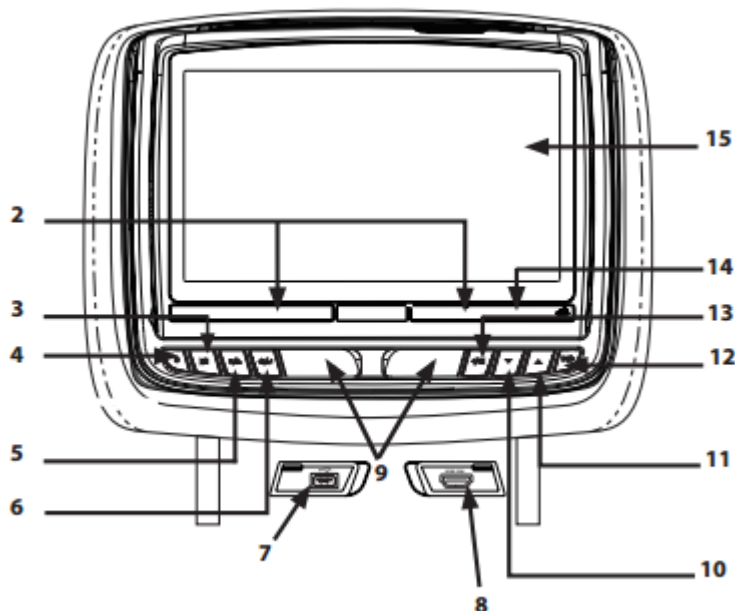


Figure 6

- 8. HDMI/MHL INPUT
For connection of device with HDMI/
MHL output.

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9. JACK COVERS

Used to protect and cover the HDMI jack and USB port when not in use.

HDMI (HDMI/MHL)

Input located on the front of the unit
This input can be used for devices with HDMI or MHL output ports (such as smartphones, tablets, HDMI/MHL devices) and may require the purchase of an HDMI cable and HDMI adapter which is available from your device manufacturer. Each device has unique requirements, please consult with your device or smartphone manufacturer to determine which type of output your device supports.

53. Another example of this receptacle can also be found at Voxx Defendants’ website and materials <http://assets.klipsch.com/productsheets/RSB-14-Spec-Sheet.pdf> and <http://blog.son-video.com/en/?s=t%C3%A9%A9commande>, as shown below:

HDMI 2.0 FOR 4K VIDEO PASS THROUGH

Whether or not you already have a 4K TV, the Klipsch Reference RSB-14 sound bar is the best choice for superior sound. Three HDMI 2.0 inputs with HDCP 2.2 provide for easy connection of your cable/DSS box, Blu-Ray player, and gaming system. One HDMI cable out to your TV provides for a superior picture. One HDMI cable is included.

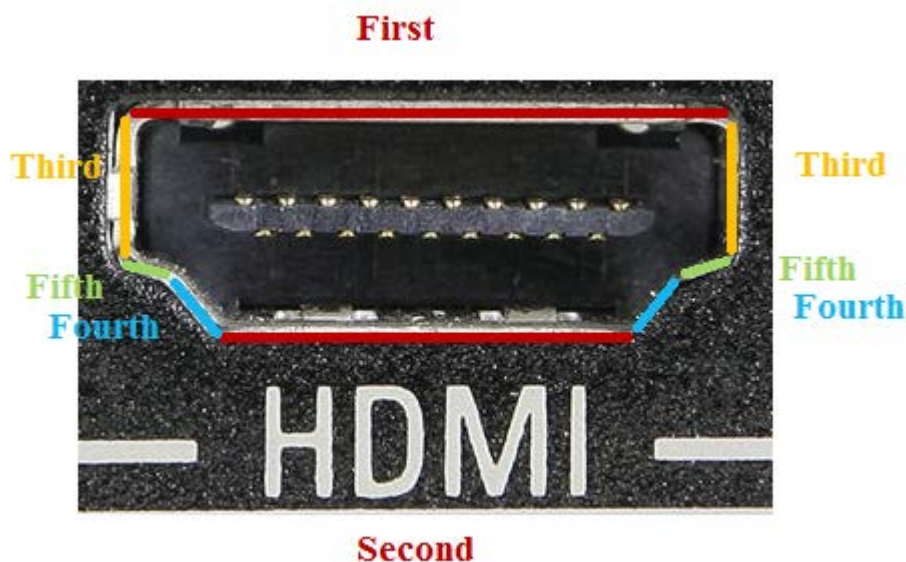
INPUTS	3 x HDMI 2.0 with HDCP 2.2 compatibility Optical Digital 3.5mm miniplug (analog) Bluetooth 2.0 with apt-X® audio decoding WIFI (for DTS Play-Fi™)
OUTPUTS	1 x HDMI 2.0 with HDCP 2.2 compatibility WIFI (for DTS Play-Fi™)



Note that the HDMI 2.0 connectors are compatible with HDCP 2.2. As such, they handle 4K UHD video stream, which they convey without processing (Passthrough) from the source to the display.

1 54. Defendants' Accused Systems are further designed with the third
2 element of claim 1. HDMI Type A plugs and receptacles, like those used by
3 Defendants in their Accused Systems, are designed with a plurality of confining
4 walls that are specifically designed and oriented. In order for a plug and receptacle
5 to be used together, their confining walls must utilize the same shape, with the plug
6 being sized smaller in order to fit within the receptacle.

7 55. In HDMI Type A connectors, like those designed into Defendants'
8 Accused Systems, the first and second sides are found opposite of each other and
9 the first side is longer than the second side. A pair of third sides are then
10 connected to the opposite ends of the first side, each of the pair being shorter than
11 either the first or second side. A pair of fourth sides are then connected to the
12 opposite ends of the second side, but the width between the two fourth sides must
13 be less than that between the two third sides. Finally, a pair of fifth sides are then
14 connected between to connect the third and fourth side of their respective sides, the
15 fifth sides must be angled away from each other while extending from the fourth
16 sides to the third sides that they connect to. This is illustrated by the following
17 diagram, which has been color coded to follow the claim language and has had
18 each of the sides of the receptacle labeled in accordance with the claim language.



1 56. Defendants' Accused Systems are further designed with the fourth
2 element of claim 1. As shown in the figure above, in HDMI Type A connectors, like
3 those designed into Defendants' Accused Systems, the first and second sides run
4 substantially parallel to each other. Further, the third sides are substantially
5 perpendicular to the first side.

6 57. Defendants' Accused Systems are further designed with the final
7 element of claim 1. As shown in the figure above, in HDMI Type A connectors, like
8 those designed into Defendants' Accused Systems, the fourth sides extend obliquely
9 from each end of the second side.

10 58. The '678 Patent has been cited by over 50 issued patents and
11 published patent applications as relevant prior art.

12 59. By making, using, selling, and offering for sale such devices, and all
13 like products that are covered by one or more claims of the '678 Patent, including at
14 least claim 1, Defendants have infringed and continue to infringe the '678 Patent,
15 including infringement under 35 U.S.C. § 271.

16 60. On information and belief, Defendants have also indirectly infringed
17 and continue to indirectly infringe the '678 Patent by actively inducing direct
18 infringement by other persons, such as their customers and end users, who operate
19 systems that embody or otherwise practice one or more of the claims of the '678
20 Patent, when Defendants had knowledge (or willful blindness thereto) of the '678
21 Patent and that the activities they were inducing would result in direct infringement
22 by others and intended that their actions would induce direct infringement by others.
23 Defendants intended and were aware that the normal and customary use of the
24 Accused Systems would infringe the '678 Patent.

25 61. Defendants intended to induce other persons, such as their customers
26 and end users, to directly infringe the '678 Patent by (1) advising or directing them
27 to make, use, sell, or import the Accused Systems, (2) advertising and promoting the
28 use of the Accused Systems, and (3) distributing instructions for using the Accused

1 Systems, all in an infringing manner. On information and belief, Defendants
2 engaged in such inducement to promote the sales of the Accused Systems, e.g.,
3 through user manuals, product support, and marketing materials to actively induce
4 the users of the accused products to infringe the '678 Patent.

5 62. On information and belief, Defendants have and continue to
6 contribute to infringement other persons, such as their customers and end users, to
7 directly infringe at least claim 1 of the '678 Patent. Defendants contribute to
8 infringement by offering to sell, selling within the United States, or importing into
9 the United States materials and apparatus for use with in practicing at least claim 1
10 of the '678 Patent. Specifically, on information and belief, Defendants know that
11 their products with a HDMI receptacle, for example, and materials and apparatus
12 designed for use with this receptacle, constitute a material and component part of the
13 invention of the '678 Patent, and is infringing, and that it is not a staple article or
14 commodity of commerce suitable for substantial non-infringing use, and it has no
15 use apart from infringing the '678 Patent.

16 63. On information and belief, Defendants have had knowledge of the
17 '678 Patent since at least the filing of the original Complaint on April 27, 2017.

18 64. On information and belief, Defendants will continue to infringe the
19 '678 Patent unless enjoined by this Court.

20 65. As a direct and proximate result of Defendants' infringement of the
21 '678 Patent, Interface has been and continues to be, damaged in an amount yet to be
22 determined, but in no event less than a reasonable royalty for the use made of the
23 invention by Defendants, together with interest and costs as fixed by the Court.

24 66. Unless a preliminary and permanent injunction are issued enjoining
25 Defendants and their officers, agents, servants and employees, and all others acting
26 on their behalf or in concert with Defendants, from infringing the '678 Patent,
27 Interface, will be greatly and irreparably harmed.

28

PRAYER FOR RELIEF

WHEREFORE, Interface prays for judgment against Defendants as follows:

- (1) For a judicial decree that Defendants have infringed, and continue to infringe, the '678 Patent;
- (2) For a judicial decree that Defendants, their respective subsidiaries, officers, agents, servants, employees, licensees, and all other persons or entities acting or attempting to act in active concert or participation with it or acting on their behalf, be preliminarily and permanently enjoined from further infringement of the '678 Patent;
- (3) For a judicial decree that order Defendants to account for and pay to Interface all damages caused to Interface by reason of Defendants' infringement pursuant to 35 U.S.C. Section 284, including enhanced damages;
- (4) For a judicial decree finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees;
- (5) For a judicial decree that Defendants pay an ongoing royalty in an amount to be determined for continued infringement after the date of judgment;
- (6) For a judicial decree awarding to Interface pre-judgment and post-judgment interest on the damages caused to it by Defendants' infringement; and
- (7) For any such other and further relief as the Court may deem just and proper under the circumstances.

Dated: May 25, 2017

ONE LLP

By: /s/John E. Lord
John E. Lord
Attorneys for Plaintiff,
Interface Linx, LLC

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DEMAND FOR JURY TRIAL

Plaintiff Interface hereby demands trial by jury in this action.

Dated: May 25, 2017

ONE LLP

By: /s/John E. Lord

John E. Lord
Attorneys for Plaintiff,
Interface Linx, LLC