

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CONSOLIDATED WORK STATION
COMPUTING, LLC,

Plaintiff,

v.

HUAWEI TECHNOLOGIES USA, INC., and
HUAWEI DEVICE USA INC.,

Defendants.

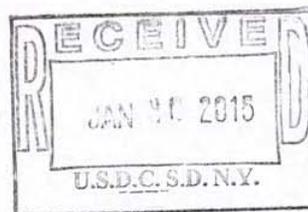
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Case No. _____

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

JUDGE DANIELS



**PLAINTIFF CONSOLIDATED WORK STATION COMPUTING, LLC'S
COMPLAINT FOR PATENT INFRINGEMENT
AND DEMAND FOR JURY TRIAL**

Plaintiff Consolidated Work Station Computing, LLC ("CWSC" or "Plaintiff") by and for its Complaint against defendants Huawei Technologies USA Inc. and Huawei Device USA Inc., (collectively "Huawei" or "Defendants") hereby alleges as follows:

NATURE OF THE CASE

1. This is an action for patent infringement arising under the patent laws of the United States. CWSC holds the rights in U.S. Patent No. 6,823,475 ("the '475 patent"). The United States patent laws grant the holder of a patent the right to exclude infringers from making, using, selling or importing the invention claimed in a patent, and to recover damages for the infringer's violations of these rights, and to recover treble damages where the infringer willingly infringed the patent. Under 35 U.S.C. § 282(a), the '475 Patent is entitled to a presumption of validity. CWSC is suing Defendants for infringing its patent, and doing so

COMPLAINT FOR PATENT INFRINGEMENT

willfully. CWSC seeks to recover damages from Defendants, including treble damages for willful infringement.

THE PARTIES

2. CWSC is a limited liability company, organized and existing under the laws of the State of Texas, having a place of business at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

3. Defendant Huawei Technologies USA Inc., is a corporation organized and existing under the laws of the State of Texas, with an office and principal place of business located at 2200 Rose Ave, Suite 2200, Dallas, Texas 85201.

4. Defendant Huawei Device USA Inc., is a corporation organized and existing under the laws of the State of Texas, with a place of business at 5700 Tennyson Parkway, Suite 600, Plano, Texas 75024.

JURISDICTION

5. This is an action for patent infringement arising under the patent laws of the United States of America, more specifically under 35 U.S.C. § 100, *et seq.* Subject matter jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 and 1338.

6. Personal jurisdiction is also proper in this Court and this judicial district under N.Y. Civ. Pract. L. R. § 302 because, upon information and belief, Defendants, among other things, conduct business in, and avail themselves of the laws of, the State of New York. In addition, upon information and belief, Defendants through their own acts and/or through the acts of their affiliated companies (acting as its agents or alter egos) make, use, offer to sell, sell (directly or through intermediaries), import, license and/or supply, in this District and elsewhere in the United States, products, through regular distribution channels, knowing such products would be used, offered for sale and/or sold in this District. Plaintiff's cause of action arises



US006823475B1

(12) **United States Patent**
Harker

(10) **Patent No.:** **US 6,823,475 B1**
(45) **Date of Patent:** **Nov. 23, 2004**

(54) **PC-CPU MOTHERBOARDS WITH COMMON FAULT-TOLERANT POWER SUPPLY**

(76) **Inventor:** **Robin Harker**, 30 Hollybush Lane, Amersham, Buckinghamshire HP6 6EB (GB)

(*) **Notice:** Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 409 days.

(21) **Appl. No.:** **09/711,983**

(22) **Filed:** **Nov. 14, 2000**

(30) **Foreign Application Priority Data**

Nov. 15, 1999 (GB) 9926858

(51) **Int. Cl.⁷** **G06F 11/16; G06F 1/26**

(52) **U.S. Cl.** **714/14; 714/22; 714/11**

(58) **Field of Search** **714/14, 22, 11; 713/300, 340**

(56) **References Cited**

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(57) **ABSTRACT**

Processor modules (2) are supported side-by-side with one another to slide in and out of a cabinet (1) on tracks (6, 7), each module (2) including a PC-CPU motherboard (11) and a hard-disk unit (16) mounted on a metal plate (3). Power is supplied to all the modules (2) in parallel from two power-supply units (18) mounted in the back of the cabinet (1), each comprising a pair of power-supply modules (19). The pairs of power-supply modules (19) supply power in parallel with one another to the processor modules (2). Diode circuitry (20) is included in each power-supply module (19) to isolate that power-supply module (19) from its paired power-supply module (19) in the event that a fault occurs by which the output voltage of the respective power-supply module (19) fall below that of the power-supply module (19) with which it is paired.

8 Claims, 4 Drawing Sheets

