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Attorneys for Plaintiff
KINGLITE HOLDINGS INC.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

KINGLITE HOLDINGS INC., a Seychelles Company,

Plaintiff,

v.

MICRO-STAR INTERNATIONAL CO., LTD., a Taiwan Corporation, and MSI COMPUTER CORP., a California Corporation.

Defendants.

Case No.: 2:15-cv-09612

COMPLAINT

[JURY TRIAL DEMANDED]

Plaintiff, Kinglite Holdings Inc. ("Kinglite") alleges by way of complaint against Defendants, Micro-Star International Co., Ltd. and MSI Computer Corp. ("Defendants") as follows:

FACTUAL BACKGROUND

Plaintiff

1. Kinglite is a company incorporated under the laws of the Republic of the Seychelles with its principal place of business at 7 Temasek Boulevard, #15-01A Suntec Tower One, Singapore 038987.

2. Kinglite is the owner of the following United States patents that are being asserted in this action ("Asserted Patents"):

U.S. Patent No.	Title	Application Date	Issue Date	Exhibit No.
6,791,572 ("'572")	Generating Media Output During Bios Boot-Up	Dec. 10, 1999	Sep. 14, 2004	A
6,892,304 ("'304")	System And Method For Securely Utilizing Basic Input And Output System (Bios) Services	Oct. 3, 2000	May 10, 2005	B
5,732,268 ("'268")	Extended Bios Adapted To Establish Remote Communication For Diagnostics And Repair	Feb. 26, 1996	Mar. 24, 1998	C
6,487,656 ("'656")	System And Method For Providing Functionalities To System Bios	Dec. 10, 1999	Nov. 26, 2002	D
6,401,202 ("'202")	Multitasking During Bios Boot-Up	Jun. 18, 1999	June 4, 2002	E
6,519,659 ("'659")	Method And System For Transferring An Application Program From System Firmware To A Storage Device	Jun. 18, 1999	Feb. 11, 2003	F

5,836,013 ("'013")	Method And Apparatus For Compressing System Read Only Memory In A Computing System	Aug. 11, 1994	Nov. 10, 1998	G
8,095,783 ("'783")	Media Boot Loader	May 11, 2004	Jan. 10, 2012	H
5,987,604 ("'604")	Method And Apparatus For Providing Execution Of System Management Mode Services In Virtual Mode	Oct. 7, 1997	Nov. 16, 1999	I
6,263,412 ("'412")	Method And Apparatus For RAM Emulation Using A Processor Register Set	Jun. 24, 1998	Jul. 17, 2001	J
6,633,976 ("'976")	Method Of Storing BIOS Modules And Transferring Them To Memory For Execution	Aug. 10, 2000	Oct. 14, 2003	K
7,185,189 ("'189")	Method Of Storing BIOS Modules And Transferring Them To Memory For Execution	Jul. 28, 2003	Feb. 27, 2007	L
6,502,184 ("'184")	Method And Apparatus For Providing A General Purpose Stack	Sep. 2, 1998	Dec. 31, 2002	M
5,978,912 ("'912")	Network Enhanced BIOS Enabling Remote Management Of A Computer Without A Functioning System	Mar. 20, 1997	Nov. 2, 1999	N
6,308,265 ("'265")	Protection Of Boot Block Code While Allowing Write Access To The Boot Block	Sep. 30, 1998	Oct. 23, 2001	O
6,222,562 ("'562")	Fast Processed Screen Image	Jun. 23, 1998	Apr. 24, 2001	P

Defendants

3. Micro-Star International Co., Ltd. ("MSI Taiwan") is a Taiwanese corporation with its principal place of business at No. 69, Lide Street, Zhonghe District, New Taipei City 235, Taiwan. It is one of the world's largest motherboard and graphics card manufacturers. MSI Taiwan also manufactures laptops, all-in-one computers, servers, industrial computers, and multimedia devices.

4. MSI Computer Corp. ("MSI USA") is a California corporation with its principal place of business at 901 Canada Court, City of Industry, California 91748. On information and belief, it is a subsidiary of MSI Taiwan and provides technical, sales, customer service, and marketing support to MSI Taiwan and its customers in the United States.

5. According to its website, www.msi.com, MSI Taiwan is doing business in the United State through MSI USA.

6. Defendants import, offer for sale, and/or sell MSI Z170A XPower Gaming Titanium Edition motherboards equipped with Intel Z170 chipset and loaded with American Megatrends, Inc. ("AMI") UEFI T.ON BIOS (dated august 4, 2015) that practice the inventions of the patents in-suit ("Accused Products"). Such products were introduced in August 2015.

Unified Extensible Firmware Interface

7. The Unified Extensible Firmware Interface ("UEFI") is a specification that defines a software interface between an operating system and platform firmware, also referred to in the industry as a Basic Input/Output System ("BIOS").

8. UEFI, which has been updated over the years in a series of releases, was developed under the aegis of the UEFI Forum, an alliance between several leading technology companies to modernize the booting process. The board of directors includes representatives from eleven "Promoter" companies: AMD, American Megatrends, Apple, Dell, HP, IBM, Insyde Software, Intel, Lenovo, Microsoft, and Phoenix Technologies.

9. The inventions of the following patents ("Phoenix UEFI patents") are contained in each version of UEFI: '304, '202, '659, '013, '783, '604, '412, '976, '189, '184, and '562.

10. The Accused Products loaded with the 2x128 Mbit flash AMI UEFI BIOS comply with the UEFI standards, and thus practice the inventions of the

Phoenix UEFI patents.

JURISDICTION AND VENUE

11. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

12. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1400(b).

13. At all relevant times, Defendants have conducted business through MSI USA and sold or offered to sell the Accused Products in this Judicial District through its network of distributors, a number of which are based or have retail outlets in this Judicial District.

COUNT I – DIRECT INFRINGEMENT OF THE '572 PATENT

14. Kinglite incorporates by reference the allegations contained in paragraphs 1-13, above.

15. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claims 23 and 51 of the '572 Patent pursuant to 35 U.S.C. § 271(a), as such products detect and display parameter values, *e.g.*, CPU speed, frequency, or temperature, in, *.e.g.*, a dashboard template.

16. Kinglite has been injured by such infringement.

COUNT II – INDIRECT INFRINGEMENT OF THE '572 PATENT

17. Users directly infringe claims 23 and 51 of the '572 Patent through operation of the Accused Products, as described in paragraph 15. When the Accused Products are used, they practice each limitation of claims 23 and 51 of the '572 Patent.

18. Defendants have had knowledge of the '572 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

19. Defendants have induced and continue to induce infringement of claims 23 and 51 of the '572 Patent pursuant to 35 U.S.C. § 271(b) by selling the

Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

20. Defendants have contributed to and continue to contribute to the infringement of claims 23 and 51 of the '572 Patent pursuant to 35 U.S.C. § 271(c) by providing substantially all of the instrumentality for direct infringement in the form of the Accused Products to the users of such products.

21. Kinglite has been injured by such infringement.

COUNT III – DIRECT INFRINGEMENT OF THE '304 PATENT

22. Kinglite incorporates by reference the allegations contained in paragraphs 1-21, above.

23. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claim 8 of the '304 Patent pursuant to 35 U.S.C. § 271(a), insofar as the Accused Products used cryptographic key pairs to encrypt a service request signature digitally.

24. Kinglite has been injured by such infringement.

COUNT IV – INDIRECT INFRINGEMENT OF THE '304 PATENT

25. Kinglite incorporates by reference the allegations contained in paragraphs 1-24 above.

26. Users directly infringe claim 12 of the '304 Patent through operation of the Accused Products. When the Accused Products are used, they practice each limitation of claim 12 of the '304 Patent insofar as the Accused Products used cryptographic key pairs to encrypt a service request signature digitally.

27. Defendants have had knowledge of the '304 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

28. Defendants have induced and continue to induce infringement of claim 12 of the '304 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the

use of such products.

29. Defendants have contributed to and continue to contribute to the infringement of claim 12 of the '304 Patent pursuant to 35 U.S.C. § 271(c) by providing the entire instrumentality for direct infringement in the form of the Accused Products to the users of such products.

30. Kinglite has been injured by such infringement.

COUNT V – DIRECT INFRINGEMENT OF THE '268 PATENT

31. Kinglite incorporates by reference the allegations contained in paragraphs 1-30, above.

32. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claim 6 of the '268 Patent pursuant to 35 U.S.C. § 271(a), insofar as the Accused Products have a first code portion in the UEFI BIOS loaded thereon to initiate POST and boot operations, and a second code portion to communicate with a separate computer in the event that there is a failure to complete boot operations.

33. Kinglite has been injured by such infringement.

COUNT VI – INDIRECT INFRINGEMENT OF THE '268 PATENT

34. Kinglite incorporates by reference the allegations contained in paragraphs 1-33 above.

35. Users directly infringe claim 6 of the '268 Patent through operation of the Accused Products, as explained in paragraph 32, above. When the Accused Products are used, they practice each limitation of claim 6 of the '268 Patent.

36. Defendants have had knowledge of the '268 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

37. Defendants have induced and continue to induce infringement of claim 6 of the '268 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the

use of such products.

38. Defendants have contributed to and continue to contribute to the infringement of claim 6 of the '268 Patent pursuant to 35 U.S.C. § 271(c) by providing the entire instrumentality for direct infringement in the form of the Accused Products to the users of such products.

39. Kinglite has been injured by such infringement.

COUNT VII – DIRECT INFRINGEMENT OF THE '656 PATENT

40. Kinglite incorporates by reference the allegations contained in paragraphs 1-39, above.

41. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claim 19 of the '656 Patent pursuant to 35 U.S.C. § 271 insofar as the processors of such products interface a module to the BIOS to receive a BIOS service request, receive device information, translate the device information, and translate and transfer such information to a separate module.

42. Kinglite has been injured by such infringement.

COUNT VIII – INDIRECT INFRINGEMENT OF THE '656 PATENT

43. Kinglite incorporates by reference the allegations contained in paragraphs 1-42 above.

44. Users directly infringe claim 19 of the '656 Patent through operation of the Accused Products, as explained in paragraph 41, above. When the Accused Products are used, they practice each limitation of claim 19 of the '656 Patent.

45. Defendants have had knowledge of the '656 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

46. Defendants have induced and continue to induce infringement of claim 19 of the '656 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the

use of such products.

47. Defendants have contributed to and continue to contribute to the infringement of claim 19 of the '656 Patent pursuant to 35 U.S.C. § 271(c) by providing the entire instrumentality for direct infringement in the form of the Accused Products to the users of such products.

48. Kinglite has been injured by such infringement.

COUNT IX – DIRECT INFRINGEMENT OF THE '202 PATENT

49. Kinglite incorporates by reference the allegations contained in paragraphs 1-48, above.

50. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claim 31 of the '202 Patent pursuant to 35 U.S.C. § 271(a) insofar as the processor of such products enables interrupt signals in response to which the processor performs a task, and, thereafter, performs a second task in advance of the next interrupt signal.

51. Kinglite has been injured by such infringement.

COUNT X – INDIRECT INFRINGEMENT OF THE '202 PATENT

52. Kinglite incorporates by reference the allegations contained in paragraphs 1-51 above.

53. Users directly infringe claim 31 of the '202 Patent through operation of the Accused Products, as shown in paragraph 50. When the Accused Products are used, they practice each limitation of claim 31 of the '202 Patent.

54. Defendants have had knowledge of the '202 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

55. Defendants have induced and continue to induce infringement of claim 31 of the '202 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

56. Defendants have contributed to and continue to contribute to the infringement of claim 31 of the '202 Patent pursuant to 35 U.S.C. § 271(c) by providing the entire instrumentality for direct infringement in the form of the Accused Products to the users of such products.

57. Kinglite has been injured by such infringement.

COUNT XI – DIRECT INFRINGEMENT OF THE '659 PATENT

58. Kinglite incorporates by reference the allegations contained in paragraphs 1-57, above.

59. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claim 1 of the '659 Patent pursuant to 35 U.S.C. § 271(a) insofar as the processor of such products executes stored instructions wherein such instructions cause the processor to write the contents of the storage element to a storage device independent of an OS application.

60. Kinglite has been injured by such infringement.

COUNT XII – INDIRECT INFRINGEMENT OF THE '659 PATENT

61. Kinglite incorporates by reference the allegations contained in paragraphs 1-60 above.

62. Users directly infringe claim 1 of the '659 Patent through operation of the Accused Products as shown in paragraph 52. When the Accused Products are used, they practice each limitation of claim 1 of the '659 Patent.

63. Defendants have had knowledge of the '659 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

57. Defendants have induced and continue to induce infringement of claim 1 of the '659 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

58. Defendants have contributed to and continue to contribute to the

infringement of claim 1 of the '659 Patent pursuant to 35 U.S.C. § 271(c) by providing the entire instrumentality for direct infringement in the form of the Accused Products to the users of such products.

59. Kinglite has been injured by such infringement.

COUNT XIII – DIRECT INFRINGEMENT OF THE '013 PATENT

60. Kinglite incorporates by reference the allegations contained in paragraphs 1-59, above.

61. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claim 23 of the '013 Patent pursuant to 35 U.S.C. § 271(a), insofar as the processor of the Accused Products executes instructions in a decompression program copying a compressed system ROM file from ROM to RAM, and decompresses the compressed data from the RAM to an associated memory location.

62. Kinglite has been injured by such infringement.

COUNT XIV – INDIRECT INFRINGEMENT OF THE '013 PATENT

63. Kinglite incorporates by reference the allegations contained in paragraphs 1-62 above.

64. Users directly infringe claim 23 of the '013 Patent through operation of the Accused Products as shown in paragraph 61. When the Accused Products are used, they practice each limitation of claim 23 of the '013 Patent.

65. Defendants have had knowledge of the '013 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

66. Defendants have induced and continue to induce infringement of claim 23 of the '013 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

67. Defendants have contributed to and continue to contribute to the

infringement of claim 23 of the '013 Patent pursuant to 35 U.S.C. § 271(c) by providing the entire instrumentality for direct infringement in the form of the Accused Products to the users of such products.

68. Kinglite has been injured by such infringement.

COUNT XV – DIRECT INFRINGEMENT OF THE '783 PATENT

69. Kinglite incorporates by reference the allegations contained in paragraphs 1-68, above.

70. Defendants' importation, sale and/or offer to sell the Accused Products loaded with the AMI compatibility support module ("CSM") constitute direct infringement of claims 11 and 20 of the '783 Patent pursuant to 35 U.S.C. § 271(a) insofar as the CSM allows the processor to boot in Legacy or UEFI mode.

71. Kinglite has been injured by such infringement.

COUNT XVI – INDIRECT INFRINGEMENT OF THE '783 PATENT

72. Kinglite incorporates by reference the allegations contained in paragraphs 1-71, above.

73. Users directly infringe claims 11 and 20 of the '783 Patent through operation of the Accused Products as shown in paragraph 70 above. When the Accused Products are used, they practice each limitation of claims 11 and 20 of the '783 Patent.

74. Defendants have had knowledge of the '783 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

75. Defendants have induced and continue to induce infringement of claims 11 and 20 of the '783 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

76. Defendants have contributed to and continue to contribute to the infringement of claims 11 and 20 of the '783 Patent pursuant to 35 U.S.C. § 271(c)

by providing substantially all of the instrumentality for direct infringement in the form of the Accused Products to the users of such products.

77. Kinglite has been injured by such infringement.

COUNT XVII – DIRECT INFRINGEMENT OF THE '604 PATENT

78. Kinglite incorporates by reference the allegations contained in paragraphs 1-77, above.

79. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claim 1 of the '604 Patent pursuant to 35 U.S.C. § 271(a) insofar as the accused products allow for the processor of such products to operate in protected mode while in system management mode.

80. Kinglite has been injured by such infringement.

COUNT XVIII – INDIRECT INFRINGEMENT OF THE '604 PATENT

81. Kinglite incorporates by reference the allegations contained in paragraphs 1-80 above.

82. Users directly infringe claims 1 and 11 of the '604 Patent through operation of the Accused Products for which the paging feature in system management mode has been activated. When these Accused Products are used, they practice each limitation of claims 1 and 11 of the '604 patent.

83. Defendants have had knowledge of the '604 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

84. Defendants have induced and continue to induce infringement of claims 1 and 11 of the '604 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

85. Defendants have contributed and to continue to contribute to the infringement of claims 1 and 11 of the '604 Patent pursuant to 35 U.S.C. § 271(c) by providing the entire instrumentality for direct infringement in the form of the

Accused Products to the users of such products.

86. Kinglite has been injured by such infringement.

COUNT XIX – DIRECT INFRINGEMENT OF THE '412 PATENT

87. Kinglite incorporates by reference the allegations contained in paragraphs 1-86, above.

88. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claims 1 and 9 of the '412 Patent pursuant to 35 U.S.C. § 271(a) insofar as the processors of such products redirect access to volatile memory.

89. Kinglite has been injured by such infringement.

COUNT XX – INDIRECT INFRINGEMENT OF THE '412 PATENT

90. Kinglite incorporates by reference the allegations contained in paragraphs 1-89, above.

91. Users directly infringe claims 1 and 9 of the '412 Patent through operation of the Accused Products as shown in paragraph 82 above. When the Accused Products are used, they practice each limitation of claims 1 and 9 of the '412 Patent.

92. Defendants have had knowledge of the '412 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

93. Defendants have induced and continue to induce infringement of claims 1 and 9 of the '412 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

94. Defendants have contributed to and continue to contribute to the infringement of claims 1 and 9 of the '412 Patent pursuant to 35 U.S.C. § 271(c) by providing substantially all of the instrumentality for direct infringement in the form of the Accused Products to the users of such products.

95. Kinglite has been injured by such infringement.

COUNT XXI – INDIRECT INFRINGEMENT OF THE '976 PATENT

96. Kinglite incorporates by reference the allegations contained in paragraphs 1-95, above.

91. Users directly infringe claims 1 and 14 of the '976 Patent through operation of the Accused Products. When the Accused Products are used, they practice each limitation of claims 1 and 14 of the '976 Patent, as such products execute a portion of BIOS initialization code, copy the dispatch manager store in nonvolatile memory to system memory, and execute the dispatch manager to execute start up tasks.

92. Defendants have had knowledge of the '976 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

93. Defendants have induced and continue to induce infringement of claims 1 and 14 of the '976 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

94. Defendants have contributed to and continue to contribute to the infringement of claims 1 and 14 of the '976 Patent pursuant to 35 U.S.C. § 271(c) by providing substantially all of the instrumentality for direct infringement in the form of the Accused Products to the users of such products.

95. Kinglite has been injured by such infringement.

COUNT XXII – DIRECT INFRINGEMENT OF THE '189 PATENT

96. Kinglite incorporates by reference the allegations contained in paragraphs 1-95, above.

97. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claims 14 and 39 of the '189 Patent pursuant to 35 U.S.C. § 271(a) insofar as such products execute a portion of BIOS

initialization code, copy the dispatch manager store in nonvolatile memory to system memory, and execute the dispatch manager to execute start up tasks.

98. Kinglite has been injured by such infringement.

COUNT XXIII – INDIRECT INFRINGEMENT OF THE '189 PATENT

96. Kinglite incorporates by reference the allegations contained in paragraphs 1-97, above.

97. Users directly infringe claims 14, 27 and 39 of the '189 Patent through operation of the Accused Products. When the Accused Products are used, they practice each limitation of such claims, as such products execute a portion of BIOS initialization code, copy the dispatch manager store in nonvolatile memory to system memory, and execute the dispatch manager to execute start up tasks.

98. Defendants have had knowledge of the '189 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

99. Defendants have induced and continue to induce infringement of claims 14, 27 and 39 of the '189 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

100. Defendants have contributed to and continue to contribute to the infringement of claims 14, 27 and 39 of the '189 Patent pursuant to 35 U.S.C. § 271(c) by providing substantially all of the instrumentality for direct infringement in the form of the Accused Products to the users of such products.

101. Kinglite has been injured by such infringement.

COUNT XXIV – DIRECT INFRINGEMENT OF THE '184 PATENT

102. Kinglite incorporates by reference the allegations contained in paragraphs 1-101, above.

103. Defendants' importation, sale and/or offer to sell the Accused

Products constitute direct infringement of claims 1 and 12 of the '184 Patent pursuant to 35 U.S.C. § 271(a) insofar as such products have one or more internal registers operating as a stack, and controlled by a processor, which, based upon the condition of such registers, arranges the contents of such registers.

104. Kinglite has been injured by such infringement.

COUNT XXV – INDIRECT INFRINGEMENT OF THE '184 PATENT

105. Kinglite incorporates by reference the allegations contained in paragraphs 1-104, above.

106. Users directly infringe claims 1, 12 and 25 of the '184 Patent through operation of the Accused Products. When the Accused Products are used, they practice each limitation of such claims, as such products have one or more internal registers operating as a stack, and controlled by a processor, which, based upon the condition of such registers, arranges the contents of such registers.

107. Defendants have had knowledge of the '184 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

108. Defendants have induced and continue to induce infringement of claims 1, 12 and 25 of the '184 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

109. Defendants have contributed to and continue to contribute to the infringement of claims 1, 12 and 25 of the '184 Patent pursuant to 35 U.S.C. § 271(c) by providing substantially all of the instrumentality for direct infringement in the form of the Accused Products to the users of such products.

110. Kinglite has been injured by such infringement.

COUNT XXVI – DIRECT INFRINGEMENT OF THE '912 PATENT

111. Kinglite incorporates by reference the allegations contained in paragraphs 1-110, above.

112. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claims 38 and 52 of the '912 Patent pursuant to 35 U.S.C. § 271(a) insofar as such products have network-enhanced software that executes during boot up, such software supporting communication with an external communicator, and having operating system software loaded after such network-enhanced software.

113. Kinglite has been injured by such infringement.

COUNT XXVII – INDIRECT INFRINGEMENT OF THE '912 PATENT

114. Kinglite incorporates by reference the allegations contained in paragraphs 1-113, above.

115. Users directly infringe claims 1, 38 and 52 of the '912 Patent through operation of the Accused Products. When the Accused Products are used, they practice each limitation of such claims, as such products have network-enhanced software that executes during boot up, such software supporting communication with an external communicator, and having operating system software loaded after such network-enhanced software.

116. Defendants have had knowledge of the '912 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

117. Defendants have induced and continue to induce infringement of claims 1, 38 and 52 of the '912 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

118. Defendants have contributed to and continue to contribute to the infringement of claims 1, 38 and 52 of the '912 Patent pursuant to 35 U.S.C. § 271(c) by providing substantially all of the instrumentality for direct infringement in the form of the Accused Products to the users of such products.

119. Kinglite has been injured by such infringement.

COUNT XXVIII – DIRECT INFRINGEMENT OF THE '265 PATENT

120. Kinglite incorporates by reference the allegations contained in paragraphs 1-119, above.

121. Defendants' importation, sale and/or offer to sell the Accused Products constitute direct infringement of claim 9 of the '265 Patent pursuant to 35 U.S.C. § 271(a) insofar as such products have identical copies of boot block code stored in separate segments in volatile memory capable of being simultaneously updated.

122. Kinglite has been injured by such infringement.

COUNT XXIX – INDIRECT INFRINGEMENT OF THE '265 PATENT

123. Kinglite incorporates by reference the allegations contained in paragraphs 1-122, above.

124. Users directly infringe claims 1 and 9 of the '265 Patent through operation of the Accused Products. When the Accused Products are used, they practice each limitation of such claims, as such products have identical copies of boot block code stored in separate segments in volatile memory capable of being simultaneously updated.

125. Defendants have had knowledge of the '265 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

126. Defendants have induced and continue to induce infringement of claims 1 and 9 of the '265 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

127. Defendants have contributed to and continue to contribute to the infringement of claims 1 and 9 of the '265 Patent pursuant to 35 U.S.C. § 271(c) by providing substantially all of the instrumentality for direct infringement in the form of the Accused Products to the users of such products.

128. Kinglite has been injured by such infringement.

COUNT XX – INDIRECT INFRINGEMENT OF THE '562 PATENT

129. Kinglite incorporates by reference the allegations contained in paragraphs 1-128, above.

130. Users directly infringe claims 1 and 12 of the '562 Patent though operation of the Accused Products. When the Accused Products are used, they practice every limitation of claims 1 and 12 of the '562 Patent, insofar as such products write contents of fast memory to a non-visible portion of video memory to display images on a computer.

131. Defendants have had knowledge of the '562 Patent and its infringement thereof as a result of ongoing litigation between the parties, and their efforts to familiarize themselves with such patent.

132. Defendants have induced and continue to induce infringement of claims 1 and 12 of the '562 Patent pursuant to 35 U.S.C. § 271(b) by selling the Accused Products to users who directly infringe the patent, and instructing such users on the use of such products.

133. Defendants have contributed to and continue to contribute to the infringement of claims 1 and 12 of the '562 Patent 35 U.S.C. § 271(c) by providing substantially all of the instrumentality for direct infringement in the form of the Accused Products to the users of such products.

134. Kinglite has been injured by such infringement.

PRAYERS FOR RELIEF

WHEREFORE, Kinglite respectfully requests that this Court:

a) Find that Defendants infringe the Kinglite patents;

b) Order Defendants to pay Kinglite damages equal to no less than a reasonable royalty to compensate for the infringement of the Kinglite patents pursuant to 35 U.S.C. § 284;

c) Order Defendants to pay Kinglite prejudgment interest;

d) Enjoin Defendants from further infringement of the Kinglite patents; and

e) Award such other relief the Court finds just and equitable.

DATED: December 14, 2015

Respectfully Submitted,

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DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all claims so triable pursuant to Fed. R. Civ. Proc. § 38(b).

DATED: December 14, 2015

Respectfully Submitted,

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