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8 *Attorneys for Plaintiff*
9 *Entropic Communications, Inc.*

10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 ENTROPIC COMMUNICATIONS,
INC., a Delaware corporation,
13
14 Plaintiff,
15 v.
16 ViXS SYSTEMS, INC., a Canadian
corporation; ViXS USA, INC., a
17 Delaware corporation,
18 Defendants.

Civil Case No.: '13CV1102 WQHBGS

COMPLAINT FOR DAMAGES

(1) Patent Infringement under
35 U.S.C. §§ 271, 281, 283-85

DEMAND FOR JURY TRIAL

1 For its complaint against Defendants ViXS Systems, Inc. (“ViXS Systems”)
2 and ViXS USA, Inc. (“ViXS USA”) (together, “ViXS”), Plaintiff Entropic
3 Communications, Inc. (“Entropic”) alleges on personal knowledge as to its own
4 activities and on information and belief as to the activities of others as follows:

5 **NATURE OF ACTION**

6 This is an action for patent infringement arising under the patent laws of the
7 United States, Title 35 of the United States Code, including without limitation 35
8 U.S.C. §§ 271 *et seq.* Entropic seeks damages, attorneys’ fees, and costs.

9 **JURISDICTION AND VENUE**

10 1. This Court has subject matter jurisdiction over this case pursuant to
11 28 U.S.C. §§ 1331 and 1338(a), because this action arises under the patent laws of
12 the United States, Title 35 of the United States Code.

13 2. This Court has personal jurisdiction over ViXS based upon at least
14 the following: (a) ViXS Systems maintains a regional research and development
15 office located within this State; (b) ViXS USA, a wholly owned subsidiary of
16 ViXS Systems, maintains its principal place of business within this District; (c)
17 ViXS transacts substantial business in and maintains continuous and systematic
18 contacts with this District and the State of California; (d) ViXS has committed
19 tortious acts that ViXS knew or should have known would cause injury to
20 Entropic in the Southern District of California; (e) ViXS USA has appointed an
21 agent in the State of California to receive service of process on its behalf; and (f)
22 Entropic has its principal place of business in the Southern District of California
23 and the development of the technology at issue took place, at least in part, in the
24 Southern District of California.

25 3. Venue is proper in the United States District Court for the Southern
26 District of California under 28 U.S.C. §§ 1391(b)-(d), 1400(b).

1 **THE PARTIES**

2 4. Entropic is a Delaware corporation with a principal place of business
3 at 6290 Sequence Dr., San Diego, California, 92121.

4 5. Upon information and belief, ViXS Systems is a Canadian
5 corporation with a principal place of business at 1210 Sheppard Ave. E., Suite
6 800, Toronto, Ontario, M2K 1E3, Canada.

7 6. Upon information and belief, ViXS USA is a Delaware corporation
8 with a principal place of business at 16935 W. Bernardo Dr., Suite 155, San
9 Diego, California, 92127.

10 **ENTROPIC AND THE ASSERTED PATENTS**

11 7. Based in San Diego, California, Entropic is a world leader in
12 semiconductor solutions for the connected home. Entropic transforms how
13 traditional HDTV broadcast and IP-based streaming video content is seamlessly,
14 reliably, and securely delivered, processed, and distributed into and throughout the
15 home. Entropic's next-generation Set-top Box (STB) System-on-a-Chip (SoC)
16 and silicon and software solutions enable Pay-TV operators to offer consumers
17 more captivating whole-home entertainment experiences by transforming the way
18 digital entertainment is delivered, connected and consumed.

19 8. Entropic is an owner by assignment of all rights, title, and interest in
20 and to United States Patent No. 7,295,518 (the “‘518 Patent”) (Exhibit A). The
21 ‘518 Patent is entitled “Broadband Network for Coaxial Cable Using Multi-
22 Carrier Modulation,” and issued on November 13, 2007.

23 9. Entropic is an owner by assignment of all rights, title, and interest in
24 and to United States Patent No. 7,889,759 (the “‘759 Patent”) (Exhibit B). The
25 ‘759 Patent is entitled “Broadband Cable Network Utilizing Common Bit-
26 Loading,” and issued on February 15, 2011.

27 10. The ‘518 Patent and the ‘759 Patent are collectively referred to herein
28 as the “Asserted Patents.”

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JURY DEMAND

Entropic demands a trial by jury on all issues triable by jury.

DATED: May 8, 2013

COVINGTON & BURLING LLP

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