

1 LAW OFFICES OF  
2 VENJURIS, P.C.  
3 1938 EAST OSBORN ROAD  
4 PHOENIX, ARIZONA 85016  
5 TELEPHONE (602) 631-9100  
6 FACSIMILE (602) 631 9796  
7 E-MAIL DOCKETING@VENJURIS.COM

8 Michael F. Campillo (AZ Bar no. 019014)  
9 Attorneys for Plaintiff

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF ARIZONA

12 TECHNICAL LED INTELLECTUAL  
13 PROPERTY, LLC., a Delaware limited  
14 liability company,

15 Plaintiff,

16 v.

17 SCHULTZE IMPORTS, LLC., an Arizona  
18 limited liability company,

19 Defendant.

Civil Action No.

ORIGINAL COMPLAINT FOR PATENT  
INFRINGEMENT

**JURY TRIAL DEMANDED**

20 This is an action for patent infringement in which Technical LED Intellectual  
21 Property, LLC. (“Technical LED” or “Plaintiff”) makes the following allegations against  
22 Schultze Imports, LLC. (“Schultze” or “Defendant”):

23 **PARTIES**

24 1. Plaintiff Technical LED is a Delaware limited liability company, with a  
25 place of business located at 251 Little Falls Dr., Wilmington, DE 19808.  
26  
27  
28

1           2.       On information and belief, Defendant Schultze is a limited liability  
2 company organized under the laws of the State of Arizona with its principal place of  
3 business at 9010 E Charter Oak Dr., Scottsdale, AZ 85260.

4  
5  
6   **JURISDICTION AND VENUE**

7           3.       Plaintiff repeats and realleges the allegations of the previous paragraphs as  
8 though fully set forth herein.

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

12           5.       Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b).  
13 On information and belief, Defendant has transacted business in this district, and has  
14 committed and/or induced acts of patent infringement in this district.

15  
16           6.       On information and belief, Defendant is subject to this Court’s specific  
17 and general personal jurisdiction pursuant to due process and/or the Arizona’s Long Arm  
18 Statue, due at least to its substantial business in this forum, including: (i) at least a portion  
19 of the infringements alleged herein; (ii) regularly doing or soliciting business, engaging  
20 in other persistent courses of conduct, and/or deriving substantial revenue from goods  
21 and services provided to individuals in Arizona and in this Judicial District; and having a  
22 regular and established place of business in this Judicial District.  
23  
24  
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28

**COUNT I**  
**INFRINGEMENT OF U.S. PATENT NO. RE41,685**

1  
2  
3       7.       Plaintiff repeats and realleges the allegations of the previous paragraphs as  
4 though fully set forth herein.

5       8.       Plaintiff is the owner by assignment of United States Patent No. RE41,685  
6 (“the ‘685 Patent”) titled “Light Source with Non-White and Phosphor-Based White LED  
7 Devices and LCD Assembly.” The ‘685 Patent reissued on September 4, 2010. A true  
8 and correct copy of the ‘685 Patent is attached as **Exhibit A**.

9  
10       9.       Upon information and belief, Defendant directly or through intermediaries  
11 has been and is now infringing the ‘685 Patent in the State of Arizona, in this judicial  
12 district, and elsewhere in the United States, by, making, using, providing, supplying,  
13 distributing, selling, and/or offering for sale products (including at least its website at  
14 www.magiclightbulbs.com), further including both the Bluetooth Bulb and the Gen 3  
15 Triangle WiFi Bulb, each comprising a light source that infringes one or more claims of  
16 the ‘685 Patent and particularly, e.g., claims 10 through 14 of the ‘685 Patent. The ‘685  
17 Patent reads on the Magic Light bulbs as set forth in the exemplary claim charts attached  
18 as **Exhibit B** and **Exhibit C**.

19  
20  
21       10.      Upon information and belief and in view of the foregoing, Defendant has  
22 been and is continuing to directly infringe, literally infringe, and/or infringe the ‘685  
23 Patent under the doctrine of equivalents. Defendant is thus liable for infringement of the  
24 ‘685 Patent pursuant to 35 U.S.C. § 271.

25  
26       11.      As a result of Defendant’s infringement of the ‘685 Patent, Plaintiff has  
27 suffered monetary damages and is entitled to a money judgment in an amount adequate to  
28 compensate for Defendant’s infringement, but in no event less than a reasonable royalty

1 for the use made of the invention by Defendant, together with interest and costs as fixed  
2 by the court, and Plaintiff will continue to suffer damages in the future unless  
3 Defendant's infringing activities are enjoined by this Court. Unless a permanent  
4 injunction is issued enjoining Defendant and its agents, servants, employees,  
5 representatives, affiliates, and all others acting on in active concert therewith from  
6 infringing the '685 Patent, Plaintiff will be greatly and irreparably harmed.  
7

8  
9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff respectfully requests that this Court enter:

- 11 1. A judgment in favor of Plaintiff that Defendant has infringed the '685  
12 Patent;  
13  
14 2. A permanent injunction enjoining Defendant and its officers, directors,  
15 agents servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all  
16 others acting in active concert therewith from infringement, inducing the infringement of,  
17 or contributing to the infringement of '685 Patent, or such other equitable relief the Court  
18 determines is just and proper;  
19  
20 3. Award, in lieu of an injunction, a compulsory ongoing royalty;  
21  
22 4. A judgment and order requiring Defendant pay to Plaintiff its damages,  
23 costs, expenses, and prejudgment and post-judgment interest for Defendant's  
24 infringement of the '685 Patent as provided under 35 U.S.C. § 284, and an accounting of  
25 ongoing post-judgment infringement; and  
26  
27 5. Any and all other relief, at law or equity, to which Plaintiff may show  
28 itself to be entitled.

**DEMAND FOR JURY TRIAL**

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Respectfully submitted,

DATED February 6, 2018.

/s/ Michael F. Campillo  
Michael F. Campillo, Esq.  
Arizona Bar No. 019014  
mfcampillo@venjuris.com  
Venjuris P.C.  
1938 E. Osborn Rd.  
Phoenix, Arizona 85016  
Tel: 602.631.9100  
Fax: 602.635.4503

**OF COUNSEL:**

/s/ Louis M. Heidelberg, Esq.  
Louis M. Heidelberg (For Admission *Pro Hac Vice*)  
Pennsylvania Bar No. 21569  
[Louis.heidelberg@gmail.com](mailto:Louis.heidelberg@gmail.com)

**The Law Offices of Louis M. Heidelberg, Esquire LLC.**  
1229 Laurel Oak LN  
York, PA 17403  
Tel: (215) 284-8910  
Fax: (267) 388-3996  
**ATTORNEYS FOR PLAINTIFF TECHNICAL LED  
INTELLECTUAL PROPERTY, LLC.**