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12 Attorneys for Plaintiff  
13 TECHNICAL LED INTELLECTUAL  
14 PROPERTY, LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

17 TECHNICAL LED INTELLECTUAL  
18 PROPERTY, LLC, a Delaware limited  
19 liability company,  
20  
21 Plaintiff,  
22  
23 v.  
24  
25 AEON LABS, LLC, a California limited  
26 liability company,  
27  
28 Defendant.

Case No.  
**COMPLAINT FOR PATENT  
INFRINGEMENT (U.S. PATENT NO.  
RE41,685)**  
**DEMAND FOR JURY TRIAL**

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

22 **PARTIES**

23 1. Plaintiff Technical LED is a Delaware limited liability company, with its principal  
24 place of business located at 251 Little Falls Dr., Wilmington, DE 19808.

25 2. On information and belief, Defendant Aeon Labs has a principal place of business  
26 at 1228 Norvell Street, El Cerrito, CA 94530.

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**JURISDICTION AND VENUE**

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

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

8 5. On information and belief, Defendant is subject to this Court’s specific and general  
9 personal jurisdiction pursuant to due process and/or California’s Long Arm Statue, due at least to  
10 its substantial business in this forum, including: (i) at least a portion of the infringements alleged  
11 herein; (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct,  
12 and/or deriving substantial revenue from goods and services provided to individuals in California  
13 and in this Judicial District; and having a regular and established place of business in this Judicial  
14 District.

**INTRADISTRICT ASSIGNMENT**

15  
16 6. Pursuant to N.D. Civil Local Rule 3-2(c), this is an intellectual property action  
17 subject to district-wide assignment.

**COUNT I**

18  
19 Infringement of U.S. Patent No. RE41,685

20 7. Plaintiff is the owner by assignment of United States Patent No. RE41,685 (“the  
21 ’685 Patent”) titled “Light Source with Non-White and Phosphor-Based White LED Devices and  
22 LCD Assembly.” The ’685 Patent reissued on September 14, 2010. A true and correct copy of  
23 the ’685 Patent is attached as Exhibit A.

24 8. Upon information and belief, Defendant directly or through intermediaries has  
25 been and is now infringing the ‘685 Patent in the State of California, in this judicial district, and  
26 elsewhere in the United States, by, making, using, providing, supplying, distributing, selling,  
27 and/or offering for sale products (including at least its website at [www.aeotec.com](http://www.aeotec.com)) further  
28 including z-wave light bulbs and similar type assemblies, comprising a light source that infringes

1 one or more claims of the '685 Patent and particularly, e.g., claims 10 through 14 of the '685  
2 Patent. The '685 Patent reads on Aeon Labs, "Aeotec" light bulbs as set forth in the exemplary  
3 claims chart attached as Exhibit B.

4 9. Upon information and belief and in view of the foregoing, Defendant has been and  
5 is continuing to directly infringe, literally infringe, and/or infringe the '685 Patent under the  
6 doctrine of equivalents. Defendant is thus liable for infringement of the '685 Patent pursuant to  
7 35 U.S.C. § 271.

8 10. As a result of Defendant's infringement of the '685 Patent, Plaintiff has suffered  
9 monetary damages and is entitled to a money judgment in an amount adequate to compensate for  
10 Defendant's infringement, but in no event less than a reasonable royalty for the use made of the  
11 invention by Defendant, together with interest and costs as fixed by the court, and Plaintiff will  
12 continue to suffer damages in the future unless Defendant's infringing activities are enjoined by  
13 this Court. Unless a permanent injunction is issued enjoining Defendant and its agents, servants,  
14 employees, representatives, affiliates, and all others acting on in active concert therewith from  
15 infringing the '685 Patent, Plaintiff will be greatly and irreparably harmed.

16 **PRAYER FOR RELIEF**

17 WHEREFORE, Plaintiff respectfully requests that this Court enter:

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

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Dated: March 26, 2018

CARR & FERRELL LLP

By: */s/ John S. Ferrell*

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JOHN S. FERRELL  
ROBERT J. YORIO  
ILENE H. GOLDBERG

Attorneys for Plaintiff  
TECHNICAL LED INTELLECTUAL  
PROPERTY, LLC

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**DEMAND FOR JURY TRIAL**

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

Dated: March 26, 2018

CARR & FERRELL LLP

By: */s/ John S. Ferrell*

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