

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA**

**TECHNICAL LED
INTELLECTUAL PROPERTY,
LLC.,**

Plaintiff,

v.

REVOGI INNOVATION CO., LTD

Defendant.

Civil Action No.

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

This is an action for patent infringement in which Technical LED Intellectual Property, LLC. (“Technical LED” or “Plaintiff”) makes the following allegations against Revogi Innovation Co., Ltd (“Revogi” or “Defendant”):

PARTIES

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

On information and belief, Defendant Revogi has a principal place of business at Annhui Building, No. 6007, Shennan Blvd Shenzhen, Guangdong, China.

JURISDICTION AND VENUE

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

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

4. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or Pennsylvania's Long Arm Statue and, altenatively, FRCivPro 4(k)(2) in that Revogi is not subject to the jurisdiction of any one state further including due at least to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Pennsylvania and in this Judicial District.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. RE41,685

6. Plaintiff is the owner by assignment of United States Patent No. RE41,685 ("the '685 Patent") titled "Light Source with Non-White and Phosphor-Based White

LED Devices and LCD Assembly.” The ’685 Patent reissued on September 4, 2010. A true and correct copy of the ’685 Patent is attached as Exhibit A.

7. Upon information and belief, Defendant directly or through intermediaries has been and is now infringing the ’685 Patent in the State of Pennsylvania, in this judicial district, and elsewhere in the United States, by, making, using, providing, supplying, distributing, selling, and/or offering for sale products (including at least its website at www.revogi.com) further including Revog light bulbs, its Delite 2 smart LED lights and similar type assemblies, comprising a light source that infringes one or more claims of the ’685 Patent and particularly, e.g., claims 10 through 14 of the ’685 Patent. The ’685 Patent reads on the Revogi bulbs as set forth in the exemplary claims chart attached as Exhibit B.

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

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

therewith from infringing the '685 Patent, Plaintiff will be greatly and irreparably harmed.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

1. A judgment in favor of Plaintiff that Defendant has infringed the '685 Patent;

2. A permanent injunction enjoining Defendant and its officers, directors, agents servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement, inducing the infringement of, or contributing to the infringement of '685 Patent, or such other equitable relief the Court determines is just and proper;

3. A judgment and order requiring Defendant pay to Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '685 Patent as provided under 35 U.S.C. § 284, and an accounting of ongoing post-judgment infringement; and

4. Any and all other relief, at law or equity, to which Plaintiff may show itself to be entitled.

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 June 7, 2018.

Respectfully submitted,
/s/ Louis M. Heidelberg, Esq.
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**ATTORNEYS FOR PLAINTIFF TECHNICAL LED
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