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16 Attorneys for Plaintiff  
17 **TECHNICAL LED INTELLECTUAL PROPERTY, LLC**  
18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 TECHNICAL LED  
21 INTELLECTUAL PROPERTY,  
22 LLC, a Delaware limited liability  
23 company,

24 Plaintiff,

25 v.

26 CULVER LED LIGHTING  
27 SOLUTIONS CORP. a California  
28 corporation,

Defendant.

Case No.

**COMPLAINT FOR PATENT  
INFRINGEMENT (U.S. PATENT  
NO. RE41,685)**

**DEMAND FOR JURY TRIAL**

26 This is an action for patent infringement in which Technical LED Intellectual  
27 Property, LLC (“Technical LED” or “Plaintiff”) makes the following allegations  
28 against Culver LED Lighting Solution Corp. (“Culver” or “Defendant”):

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**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.

2. On information and belief, Defendant Culver is a California corporation and has a principal place of business at 17961 Cowan B, Suite 8, Irvine, CA 92614.

**JURISDICTION AND VENUE**

3. 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).

4. 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.

5. On information and belief, Defendant is subject to this Court’s specific and general personal jurisdiction pursuant to due process and/or California’s Long Arm Statue, 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 California and in this Judicial District; and having a regular and established place of business in this Judicial District.

**FIRST CAUSE OF ACTION**

**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 14, 2010. A true and correct copy of the ’685 Patent is attached as **Exhibit**

**A.**



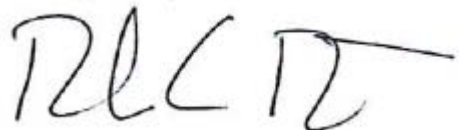
1           2.     A permanent injunction enjoining Defendant and its officers, directors,  
2 agents servants, affiliates, employees, divisions, branches, subsidiaries, parents, and  
3 all others acting in active concert therewith from infringement, inducing the  
4 infringement of, or contributing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

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

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

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15 DATED: January 22, 2019

**FERNALD LAW GROUP APC**

16  
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19 By:   
          Brandon C. Fernald

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21 Attorneys for Plaintiff  
22 TECHNICAL LED INTELLECTUAL  
23 PROPERTY, LLC  
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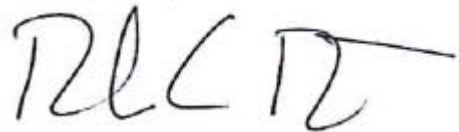
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**DEMAND FOR JURY TRIAL**

Technical LED, pursuant to Rule 38 of the Federal Rules of Civil Procedure and Local Rule 38-1, hereby requests a trial by jury of any issues so triable by right.

DATED: January 22, 2019

**FERNALD LAW GROUP APC**

By:   
Brandon C. Fernald

Attorneys for Plaintiff  
TECHNICAL LED INTELLECTUAL  
PROPERTY, LLC