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10 *Attorneys for Plaintiff*
11 *Bluestone Innovations LLC*

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 **BLUESTONE INNOVATIONS LLC,**

16 Plaintiff,

17 v.

18 **TORCHSTAR CORP.,**

19 Defendant.

Case No. __

ORIGINAL COMPLAINT

20 **ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

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22 This is an action for patent infringement in which Bluestone Innovations LLC (“Plaintiff”)
23 makes the following allegations against Torchstar Corp. (“Defendant”):

24 **PARTIES**

25 1. Plaintiff is a Virginia limited liability company, having a principal place of business of
26 1984 Isaac Newton Sq., Ste. 203, Reston, VA 20190.
27

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ORIGINAL COMPLAINT
CASE NO. _____

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 6,163,557

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3 9. Upon information and belief, Defendant has been and is now infringing at least Claim
4 1 of the '557 Patent in the State of California, in this judicial district, and elsewhere in the United
5 States, by, among other things, directly or through intermediaries, making, using, importing, providing,
6 supplying, distributing, selling, and/or offering for sale LED Lightbulbs with epitaxial film (including,
7 without limitation, at least the Torchstar 12V 4W MR16 Light Bulb) which include; a substrate
8 including at least one upstanding mesa, each mesa having a top surface; and a group III-V nitride
9 epitaxial film on the top surface of at least one mesa; wherein the at least one mesa including surfaces
10 oriented along crack planes of the epitaxial film, covered by one or more claims of the '557 Patent to
11 the injury of Plaintiff. Defendant is directly infringing, literally infringing, and/or infringing the '557
12 Patent under the doctrine of equivalents. Defendant is thus liable for infringement of the '557 Patent
13 pursuant to 35 U.S.C. § 271.
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16 10. As a result of Defendant's infringement of the '557 Patent, Plaintiff has suffered
17 monetary damages and is entitled to a money judgment in an amount adequate to compensate for
18 Defendant's infringement, but in no event less than a reasonable royalty for the use made of the
19 invention by Defendant, together with interest and costs as fixed by the court, and Plaintiff will continue
20 to suffer damages in the future unless Defendant's infringing activities are enjoined by this Court.
21

22 11. Unless a permanent injunction is issued enjoining Defendant and its agents, servants,
23 employees, representatives, affiliates, and all others acting on in active concert therewith from
24 infringing the '557 Patent, Plaintiff will be greatly and irreparably harmed.

PRAYER FOR RELIEF

25
26 WHEREFORE, Plaintiff respectfully requests that this Court enter:
27

28 1. A judgment in favor of Plaintiff that Defendant has infringed the '557 Patent;

