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**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

Rondevoo Technologies, LLC, a  
California Limited Liability Company

Plaintiff,

v.

Force Training Institute, LLC, a  
California Limited Liability Company,

Defendant.

) Case No. 2:18-cv-6769

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**COMPLAINT FOR  
INFRINGEMENT OF  
U.S. PATENT NO. 6,161,738**

**DEMAND FOR JURY TRIAL**

1 **COMPLAINT FOR PATENT INFRINGEMENT**

2 Plaintiff Rondevoo Technologies, LLC, ("Rondevoo" or "Plaintiff"), by and  
3 through its undersigned counsel, for its Complaint against Defendant Force Training  
4 Institute, LLC, ("FTI" or "Defendant") makes the following allegations upon  
5 information and belief:

6 **NATURE OF THE ACTION**

7 1. This is an action against Defendant for infringement of one or more claims  
8 of United States Patent No. 6,161,738 ("the '738 Patent").

9 **PARTIES**

10 2. Plaintiff Rondevoo Technologies, LLC is a limited liability company  
11 organized under the laws of the State of California and has an office and principal place  
12 of business at 177 E. Colorado Blvd., Ste 200, Pasadena, CA 91101.

13 3. Defendant Force Training Institute, LLC is a limited liability company  
14 organized under the laws of the State of California and has an office and principal place  
15 of business at 15233 Ventura Blvd., #100, Sherman Oaks, CA 91403.

16 **JURISDICTION AND VENUE**

17 4. This action arises under the patent laws of the United States, 35 U.S.C. §  
18 1, *et seq.*, including, without limitation 35 U.S.C. §§ 271, 281, 284, and 285.

19 5. This Court has subject matter jurisdiction over this action pursuant to 28  
20 U.S.C. §§ 1331 and 1338(a) because it arises under United States Patent law.

21 6. This Court has personal jurisdiction over the Defendant because, *inter alia*,  
22 it resides in the State of California, regularly conducts business in the State of  
23 California, and continues to commit acts of patent infringement in the State of  
24 California including by making, using, offering to sell, and/or selling the Infringing  
25 Device within the State of California and this district.

26 7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c)  
27 and 1400(b). Defendant is subject to this Court's personal jurisdiction because, *inter*  
28 *alia*, Defendants have committed and continue to commit acts of patent infringement

1 including making, using, offering to sell, and/or selling the Infringing Device in this  
2 district, and/or importing the Infringing Device into this district. Defendant also  
3 maintains a regular and established place of business in this judicial district.

4 **FACTS**

5 8. Plaintiff is the owner, by assignment, of U.S. Patent No. 6,161,738 (“the  
6 ‘738 Patent”), entitled “Bag Style Container with Bullet Resistant Deployable Panels,”  
7 which was duly and legally issued on December 19, 2000 by the United States Patent  
8 and Trademark Office (“USPTO”).

9 9. A copy of the ‘738 Patent is attached to this Complaint as **Exhibit A**.

10 10. The claims of the ‘738 Patent are valid and enforceable.

11 11. The term of the ‘738 Patent extends through July 12, 2019.

12 12. Claim 1 of the ‘738 Patent covers:

13 a combination container for transporting articles and ballistic shield comprising:  
14 a bag, said bag having a forward wall and a rear wall each having upper and lower  
15 edges, means for joining peripheries of said forward wall and said rear wall, to  
16 form a compartment therebetween, and forming an orifice at said upper edges  
17 providing communication to said compartment,

18 at least one ballistic shield, said ballistic shield comprised of material sufficient  
19 to shield the user from anticipated high speed projectiles, said ballistic shield  
20 attachable to one or both of said forward wall and said rear wall;

21 means of attachment of said ballistic shield;

22 carrying means attached to said bag;

23 an upper flap attached at a first end to one of said upper edges; and

24 a deployable ballistic shield, said deployable ballistic shield attached to said  
25 upper flap, said deployable ballistic shield comprised of bullet resistant textile  
26 fabric;

27 whereby a user of said bag may employ said bag to carry articles therein and  
28 concurrently be shielded from high speed projectiles by said ballistic shield and

1 said deployable ballistic shield.

2 13. Claim 2 of the '738 Patent covers: "the device as defined in claim 1  
3 additionally comprising a lower flap attached at one end to one of said lower edges, at  
4 least one additional ballistic shield, said additional ballistic shield attachable to said  
5 lower flap using said means of attachment of said ballistic shield."

6 14. Claim 3 of the '738 Patent covers: "the device as defined in claim 1  
7 additionally comprising said upper flap deployable to an elongated position, and means  
8 of attachment of said ballistic shield."

9 15. Claim 4 of the '738 Patent covers: "the device as defined in Claim 3,  
10 wherein said means to hold said bag in an elevated position is a handle attached adjacent  
11 to a distal end of said upper flap."

12 16. Claim 5 of the '738 Patent covers: "the device as defined in claim 1,  
13 wherein said means of attachment of said ballistic shield is a shield pocket, said shield  
14 pocket sized to accommodate said ballistic shield and constructed upon the wall surface  
15 to which said ballistic shield is mounted."

16 17. Claim 13 of the '738 Patent covers: "the device as claimed in claim 1  
17 additionally comprising a means of blunt force absorption located adjacent to said  
18 ballistic shield."

19 **COUNT I: CLAIM FOR DIRECT PATENT INFRINGEMENT**

20 **UNDER 35 U.S.C. § 271(a) ('738 PATENT)**

21 18. Plaintiff hereby incorporates by reference the allegations set forth above  
22 as if fully set forth herein.

23 19. Defendant has directly infringed at least claims 1, 2, 3, 4, 5, and 13 of the  
24 '738 Patent in violation of 35 U.S.C. § 271(a) by making, importing, using, selling,  
25 and/or offering for sale in the United States products that embody the patented  
26 invention, and Defendant will continue to do so unless enjoined by this court.

27 20. Defendant's infringing products include, without limitation, its MTST<sup>TM</sup>  
28 Multi-Threat Shield (hereafter "Infringing Device").

1           21. The Infringing Device satisfies each and every element of each asserted  
2 claim of the '738 Patent, as detailed in the preliminary claim chart attached hereto as  
3 **Exhibit B**, and incorporated herein by reference, either literally or under the doctrine  
4 of equivalents.

5           22. The Infringing Device includes a bag for transporting articles that  
6 functions as a ballistic shield. See Exhibit B, p. 1.

7           23. The Infringing Device includes a bag that includes a compartment for  
8 transporting articles formed from walls that are joined together. See Exhibit B, p. 2.

9           24. The Infringing Device includes 1680 Denier Ballistic Nylon that defeats  
10 impacts from handguns, shotguns, and pistol caliber sub-machine gun ammunitions.  
11 See Exhibit B, p. 3.

12           25. The Infringing Device includes a ballistic shield that is incorporated into  
13 the forward wall of the bag. See Exhibit B, p. 3.

14           26. The Infringing Device includes a strap for carrying. See Exhibit B, p. 4.

15           27. The Infringing Device includes an upper flap. See Exhibit B, p. 5.

16           28. The Infringing Device includes a plate inserted into the 1680 Denier  
17 Ballistic Nylon upper flap. See Exhibit B, p. 6.

18           29. The Infringing Device can be used to carry articles while simultaneously  
19 functioning as a ballistic shield. See Exhibit B, p. 7.

20           30. Each one of the elements included in the Infringing Device, itemized in  
21 paragraphs 22 – 29 above, is an element in Claim 1 of the '738 Patent.

22           31. The Infringing Device includes a lower flap including 1680 Denier  
23 Ballistic Nylon. See Exhibit B, p. 8.

24           32. Each one of the elements included in the Infringing Device, itemized in  
25 paragraphs 22 – 29 and 31 above, is an element in Claim 2 of the '738 Patent.

26           33. The Infringing Device includes a handle for holding the bag in an elevated  
27 and elongated position. See Exhibit B, p. 9.

28           34. Each of the elements included in the Infringing Device, itemized in

1 paragraphs 22 – 29 and paragraph 33 above, is an element in Claim 3 of the ‘738 Patent.

2 35. The Infringing Device includes the handle, where the handle is attached to  
3 the upper flap. See Exhibit B, p. 10.

4 36. Each of the elements included in the Infringing Device, itemized in  
5 paragraphs 22-29, paragraph 33, and paragraph 35 above, is an element in Claim 4 of  
6 the ‘738 Patent.

7 37. The Infringing Device includes a shield pocket for attaching the ballistic  
8 shield. See Exhibit B, p. 11.

9 38. Each of the elements included in the Infringing Device, itemized in  
10 paragraphs 22-29 and paragraph 37 above, is an element in Claim 5 of the ‘738 Patent.

11 39. The Infringing Device includes a shock pad and Kydex® insert for blunt  
12 force protection. See Exhibit B, p. 12.

13 40. Each of the elements included in the Infringing Device, itemized in  
14 paragraphs 22-29 and paragraph 39 above, is an element in Claim 13 of the ‘738 Patent.

15 41. Defendant’s infringing activities are and have been without authority or  
16 license under the ‘738 Patent.

17 42. Plaintiff has been, and will continue to be, irreparably harmed by  
18 Defendant’s ongoing infringement of the ‘738 Patent.

19 43. As a direct and proximate result of Defendant’s infringement of the ‘738  
20 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be  
21 determined, including but not limited to Plaintiff’s lost profits and/or a reasonable  
22 royalty.

23 44. Plaintiff is entitled to recover from Defendant the damages sustained by  
24 Plaintiff as a result of Defendant’s infringing acts, in an amount subject to proof at trial,  
25 which, by law, cannot be less than a reasonable royalty, together with interest and costs  
26 as fixed by this Court, pursuant to 35 U.S.C. § 284.

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**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for relief against Defendant as follows:

A. An adjudication in favor of Plaintiff that Defendant has infringed one or more claims of the '738 Patent, either literally or under the doctrine of equivalents;

B. Requiring Defendant to provide an accounting and to pay Plaintiff an award adequate to compensate Plaintiff for Defendant's acts of infringement, including damages, costs, expenses, and prejudgment and post-judgment interest as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

C. For such other and further relief that this Court deems just and proper.

**DEMAND FOR TRIAL BY JURY**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands a jury trial on all issues and causes of action triable to a jury.

Dated: August 7, 2018

Respectfully submitted,  
**COTMAN IP LAW GROUP, PLC**  
By: /s/ Jayson S. Sohi  
Jayson S. Sohi  
*Counsel for Plaintiff*  
*Rondevoo Technologies, LLC*