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SOVEREIGN PEAK VENTURES, LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 SOVEREIGN PEAK VENTURES, LLC,

13 Plaintiff,

14 v.

15 LIFI LABS, INC.,

16 Defendant.
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CASE NO. 3:19-cv-00025

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

1 Plaintiff Sovereign Peak Ventures, LLC (“SPV”), by and through the undersigned
2 counsel, hereby brings this action and makes the following allegations of patent infringement
3 relating to U.S. Patent Nos. 6,577,073 (“the ’073 patent”) and 7,204,607 (“the ’607 patent”),
4 (collectively “the Asserted Patents”) against Defendant Lifi Labs, Inc. (“Lifi”) and alleges as
5 follows upon actual knowledge with respect to itself and its own acts, and upon information and
6 belief as to all other matters.

7
8 **NATURE OF THE ACTION**

9 1. This is an action for patent infringement. SPV alleges that Lifi has infringed
10 and/or is infringing one or more of the ’073 patent and the ’607 patent, copies of which are
11 attached as Exhibits A-B, respectively.

12 2. SPV alleges that Lifi directly infringes and/or has infringed the Asserted Patents
13 by making, using, offering for sale, selling, and/or importing various models of LED bulbs. SPV
14 seeks damages and other relief for Lifi’s infringement of the Asserted Patents.

15 **THE PARTIES**

16 3. Plaintiff SPV is a Texas limited liability company with its principal place of
17 business in Plano, Texas.

18 4. Upon information and belief, Lifi is a Delaware corporation with places of
19 business in Redwood City and/or San Francisco, California.

20 **JURISDICTION AND VENUE**

21 5. This action for patent infringement arises under the Patent Laws of the United
22 States, 35 U.S.C. § 1 et. seq. This Court has original jurisdiction under 28 U.S.C. §§ 1331 and
23 1338.

24 6. This Court has both general and specific personal jurisdiction over Lifi because
25 Lifi has committed acts within this District giving rise to this action and has established minimum
26 contacts with this forum such that the exercise of jurisdiction over Lifi would not offend
27 traditional notions of fair play and substantial justice. Lifi, directly and through subsidiaries and
28 intermediaries (including distributors, retailers, franchisees and others), has committed and

1 continues to commit acts of infringement in this District by, among other things, making, using,
2 testing, selling, importing, and/or offering for sale products that infringe the Asserted Patents.

3 7. Venue is proper in this District and division under 28 U.S.C. §§1391(b)-(d) and
4 1400(b) because Lifi is resides in this District with at least one regular and established place of
5 business in this District, transacts business in this District, and has committed and continues to
6 commit acts of direct infringement in this District.

7 **INTRADISTRICT ASSIGNMENT**

8 8. Pursuant to Local Rule 3-2(c), this case is subject to district-wide assignment
9 because it is an Intellectual Property Action.

10 **COUNT I: INFRINGEMENT OF THE '073 PATENT**

11 9. The allegations of paragraphs 1-8 of this Complaint are incorporated by reference
12 as though fully set forth herein.

13 10. SPV owns by assignment the entire right, title, and interest in the '073 patent.

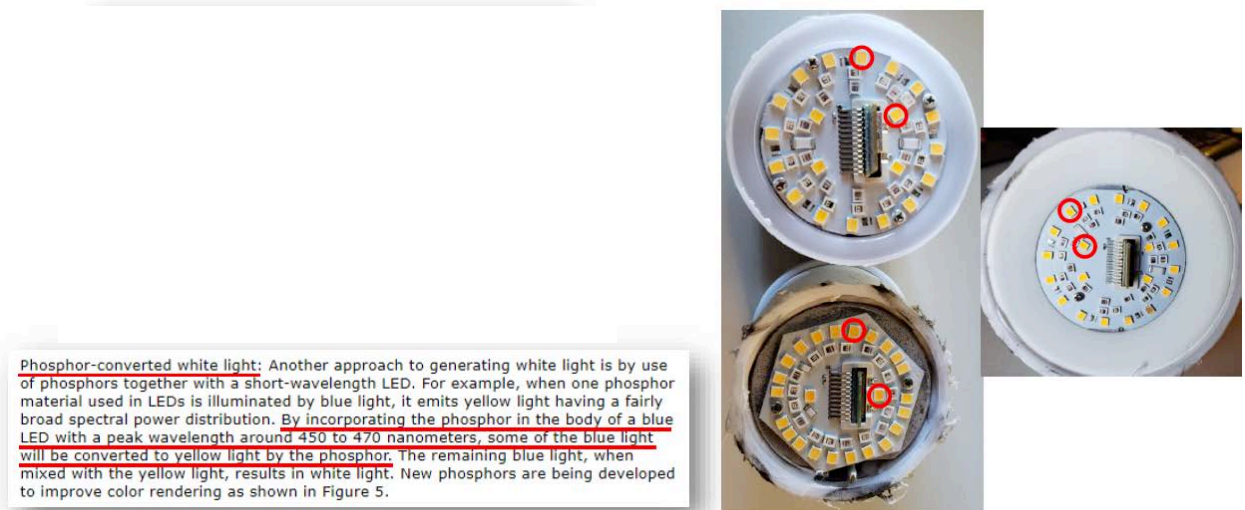
14 11. The '073 patent was issued by the United States Patent and Trademark Office on
15 June 10, 2003 and is titled "LED Lamp." A true and correct copy of the '073 patent is attached as
16 Exhibit A

17 12. Upon information and belief, Lifi has directly infringed at least claim 1 of the '073
18 patent by making, using, testing, selling, offering for sale and/or importing in the United States
19 without authority devices such as the LIFX bulbs (collectively "the Accused Infringing Devices")
20 in an exemplary manner as described below.

21 13. The Accused Infringing Devices are LED lamps.

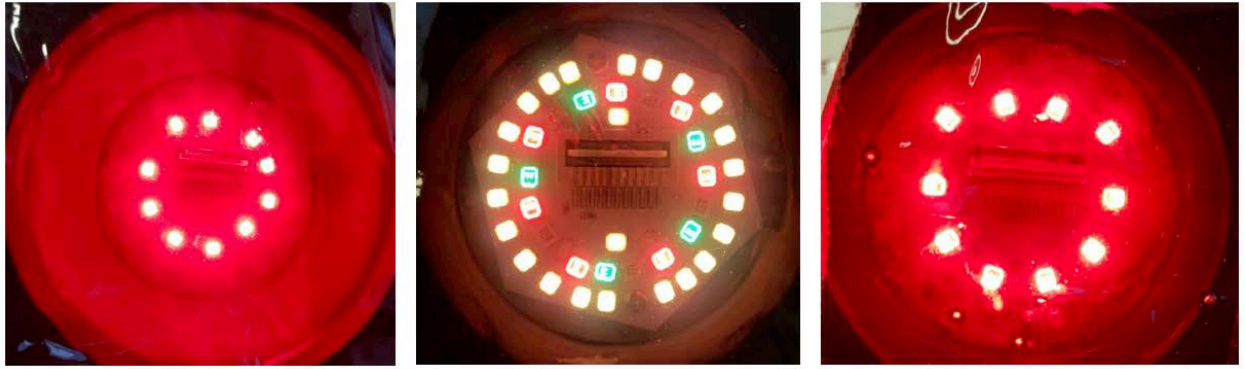


14. The Accused Infringing Devices have a blue LED for producing an emission wavelength falling within a blue wavelength range. Exemplary blue LEDs, which are covered in a yellow phosphor, are shown circled in red in the figures below.



<https://www.lrc.rpi.edu/programs/nlpiip/lightinganswers/led/whiteLight.asp>

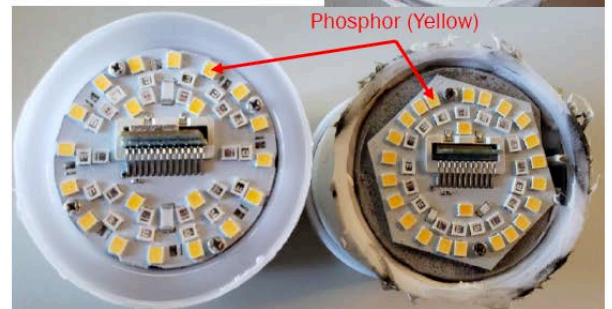
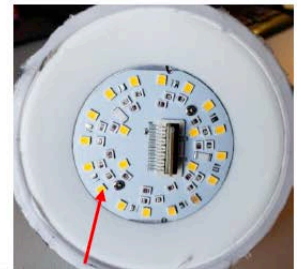
15. The Accused Infringing Devices have a red LED for producing an emission at a wavelength falling within a red wavelength range.



16. The Accused Infringing Devices have a phosphor that has been photoexcited by the blue LED to exhibit a luminescence having an emission spectrum in an intermediate wavelength range between the blue and red wavelength ranges.

Phosphor-converted white light: Another approach to generating white light is by use of phosphors together with a short-wavelength LED. For example, when one phosphor material used in LEDs is illuminated by blue light, it emits yellow light having a fairly broad spectral power distribution. By incorporating the phosphor in the body of a blue LED with a peak wavelength around 450 to 470 nanometers, some of the blue light will be converted to yellow light by the phosphor. The remaining blue light, when mixed with the yellow light, results in white light. New phosphors are being developed to improve color rendering as shown in Figure 5.

<https://www.lrc.rpi.edu/programs/nlpip/lightinganswers/led/whiteLight.asp>



17. Lifi has thus infringed at least claim 1 of the '073 patent by making, using, testing, selling, offering for sale and/or importing the Accused Infringing Devices.

18. Lifi's acts of direct infringement have caused damage to SPV, and SPV is entitled to recover damages sustained as a result of Lifi's wrongful acts in an amount subject to proof at trial.

COUNT II: INFRINGEMENT OF THE '607 PATENT

19. The allegations of paragraphs 1-8 of this Complaint are incorporated by reference as though fully set forth herein.

20. SPV owns by assignment the entire right, title, and interest in the '607 patent.

1 21. The '607 patent was issued by the United States Patent and Trademark Office on
2 April 17, 2007 and is titled "LED Lamp." A true and correct copy of the '607 patent is attached
3 as Exhibit B.

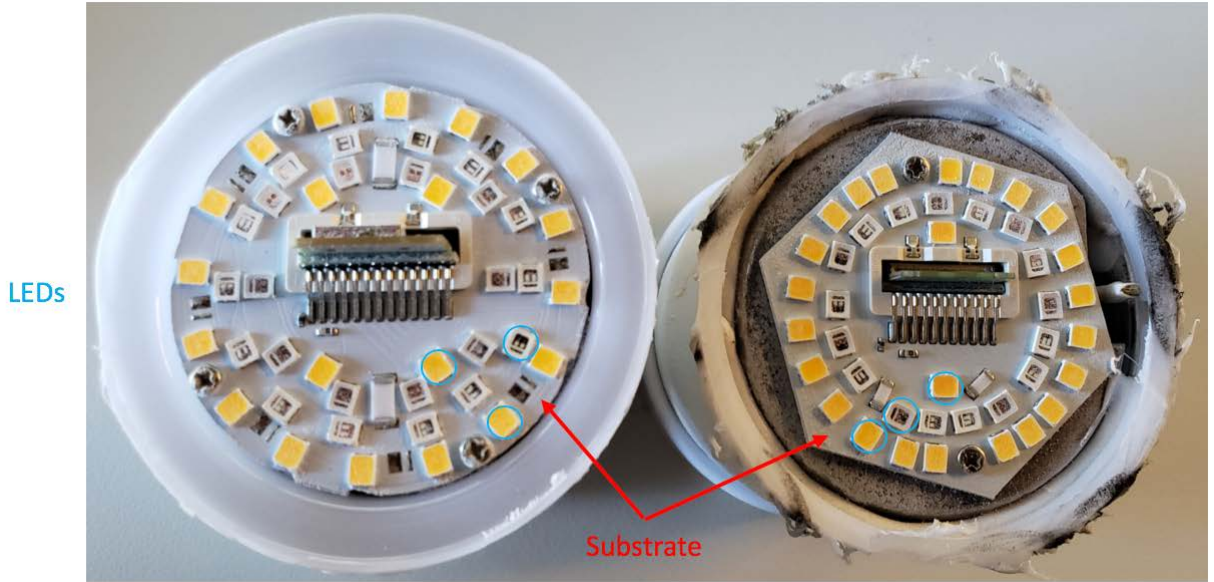
4 22. Upon information and belief, Lifi has directly infringed at least claim 9 of the '607
5 patent by making, using, testing, selling, offering for sale and/or importing in the United States
6 without authority devices such as the LIFX bulbs (collectively the "Accused Infringing Devices")
7 in an exemplary manner as described below.

8 23. The Accused Infringing Devices are Light emitting diodes (LEDs).

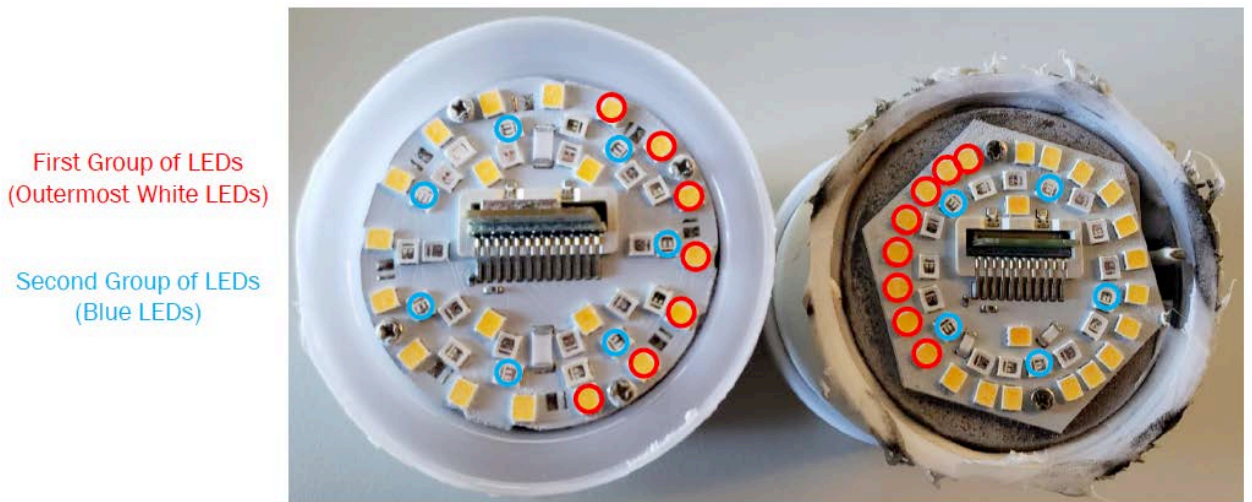


22 24. The Accused Infringing Devices contain a substrate, a cluster of LEDs, which are
23 arranged two-dimensionally on the substrate and an interconnection circuit which is electrically
24 connected to the LEDs.

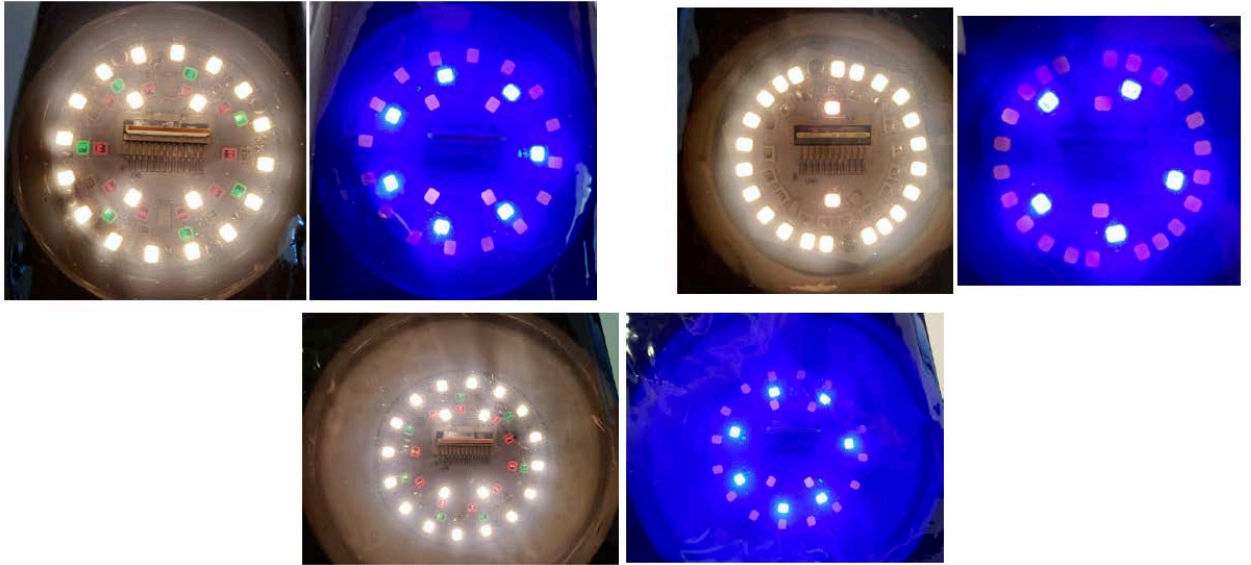
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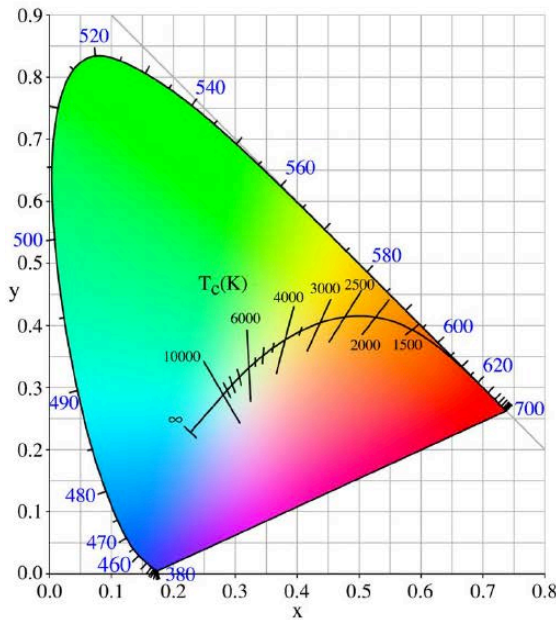
25. The Accused Infringing Devices contain LEDs where a first group of LEDs, which are located around the outer periphery of the cluster, and a second group of LEDs, which are located elsewhere in the cluster (e.g., toward the center).



26. The Accused Infringing Devices contain an interconnection circuit wherein the interconnection circuit has an interconnection structure for separately supplying drive currents to at least one of the LEDs in the first group and to at least one of the LEDs in the second group separately from each other. One or more of the LEDs in the outer periphery can be operated independently of one or more LEDs located toward the center.



27. The emission of the LEDs from the first group in the Accused Infringing Devices has a lower color temperature than that of the LEDs in the second group.



“White” LEDs typically measure between 2,500-5,000K
 Blue LEDs typically measure above 12,000K

28. Lifi has thus infringed at least claim 9 of the '607 patent by making, using, testing, selling, offering for sale and/or importing the Accused Infringing Devices.

29. Lifi’s acts of direct infringement have caused damage to SPV, and SPV is entitled to recover damages sustained as a result of Lifi’s wrongful acts in an amount subject to proof at trial.

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PRAYER FOR RELIEF

WHEREFORE, SPV respectfully requests the following relief:

- A. A judgment that Lifi has infringed the '073 patent;
- B. A judgment that Lifi has infringed the '607 patent;
- C. A judgment that SPV be awarded damages adequate to compensate it for Lifi's past infringement and any continuing or future infringement of the '073 patent and the '607 patent, including pre-judgment and post-judgment interest costs and disbursements as justified under 35 U.S.C. § 284 and an accounting;
- D. That SPV be granted its reasonable attorneys' fees in this action;
- E. That this Court award SPV its costs; and
- F. That this Court award SPV such other and further relief as the Court deems proper.

Dated: January 2, 2019

FEINBERG DAY ALBERTI LIM & BELLOLI LLP

By: */s/ Marc Belloli*

Marc Belloli

Attorneys for Plaintiff Sovereign Peak Ventures, LLC

DEMAND FOR JURY TRIAL

SPV demands trial by jury for all issues so triable pursuant to Fed. R. Civ. P. 38(b) and Civil L.R. 3-6(a).

Dated: January 2, 2019

FEINBERG DAY ALBERTI LIM & BELLOLI LLP

By: */s/ Marc Belloli*

Marc Belloli

Attorneys for Plaintiff Sovereign Peak Ventures, LLC