

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**RONDEVOO TECHNOLOGIES, LLC,  
A California Limited Liability Company**

**Plaintiff,**

**v.**

**AERNOS, INC., A Delaware Corporation,**

**Defendant**

Civil Action No. \_\_\_\_\_

**JURY TRIAL DEMANDED**

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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Rondevoo Technologies, LLC, (“Rondevoo” or “Plaintiff”), by and through its undersigned counsel, for its Complaint against Defendant Aernos, Inc. (“Aernos” or “Defendant”) makes the following allegations, all upon information and belief.

**NATURE OF THE ACTION**

1. This is an action against Defendant for infringement of one or more claims of United States Patent No. 9,453,814 (“the ‘814 Patent”) and for infringement of one or more claims of United States Patent No. 9,927,391 (“the ‘391 Patent”).

**PARTIES**

2. Plaintiff Rondevoo Technologies, LLC is a limited liability company organized under the laws of the State of California and has an office and principal place of business at 35 Hugus Alley, Suite 210, Pasadena, California 91103.

3. Defendant Aernos, Inc. is a corporation incorporated under the laws of the State of Delaware and has an office and principal place of business at 3030 Bunker Hill Street, Suite 105, San Diego, California 92109.

**JURISDICTION AND VENUE**

4. This patent infringement action arises under the patent laws of the United States, including 35 U.S.C. §§ 271 et seq., 281, and 284.

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

6. This Court has personal jurisdiction over the Defendant because it (either directly or through its subsidiaries, divisions, groups or distributors) has sufficient minimum contacts with the forum as a result of business conducted within the State of Delaware and this District; and/or specifically over the Defendant (either directly or through its subsidiaries, divisions, groups or distributors) because of its infringing conduct within or directed at this district.

7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c), since the related acts and transactions include the sale and operation of the device identified herein was done by Defendant in the State of Delaware and throughout this district.

**FACTS**

8. Plaintiff is the sole owner, by assignment, of U.S. Patent No. 9,453,814, entitled “NANO SENSOR,” which was duly and legally issued on September 27<sup>th</sup>, 2016 by the United States Patent and Trademark Office (“USPTO”).

9. A copy of the ‘814 Patent is attached to this Complaint as **Exhibit A**.

10. The claims of the ‘814 Patent are valid and enforceable.

11. Plaintiff is the sole owner, by assignment, of U.S. Patent No. 9,927,391, entitled “NANO SENSOR,” which was duly and legally issued on March 27<sup>th</sup>, 2018 by the United States Patent and Trademark Office (“USPTO”).

12. A copy of the ‘391 Patent is attached to this Complaint as **Exhibit B**.

13. The claims of the ‘391 Patent are valid and enforceable.

**COUNT I: CLAIM FOR PATENT INFRINGEMENT**  
**UNDER 35 U.S.C. § 271(a) ('814 PATENT)**

14. Plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 13 of this Complaint as if fully set forth herein.

15. Claim 1 of the '814 Patent covers "A device, comprising: an upper metallic layer, a lower layer, a nano sensor array positioned between the upper and lower layers to detect a presence of a gas, a chemical, or a biological object, wherein each sensor's electrical characteristic changes when encountering the gas, chemical or biological object, and a matrix film on the nano sensor array wherein a physical parameter of the matrix film changes to measure gas or liquid concentration." *See* Exhibit A.

16. Defendant Aernos developed, develops, used, uses, sells, implements, and distributes nano sensor devices including without limitation the AerIoT device ("Accused Product").

17. A claim chart comparing Claim 1 of the '814 Patent to the Accused Products is attached as **Exhibit C**.

18. The Accused Product is a nano gas sensor device. *See* Exhibit C, p. 1.

19. The Accused Product includes a deposited upper metallic layer. *See* Exhibit C, p. 2.

20. The Accused Product includes a silicon lower layer. *See* Exhibit C, p. 3.

21. The Accused Product includes a nano sensor array that detects multiple gases simultaneously. *See* Exhibit C, p. 3.

22. The Accused Product includes a matrix film that has electrical properties that are tracked to determine levels of gas detection. *See* Exhibit C, p. 4.

23. Thus, Aernos infringes at least Claim 1 of the '814 Patent.

24. Plaintiff has been, and will continue to be, irreparably harmed by Aeronos' ongoing infringement of the '814 Patent.

25. As a direct and proximate result of Aernos' infringement of the '814 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be determined, including but not limited to Plaintiff's lost profits and/or a reasonable royalty.

**COUNT II: CLAIM FOR PATENT INFRINGEMENT**  
**UNDER 35 U.S.C. § 271(a) ('391 PATENT)**

26. Plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 25 of this Complaint as if fully set forth herein.

27. Claim 19 of the '391 Patent covers "A device, comprising: an upper metallic layer, a lower layer, and a nano sensor positioned between the upper metallic layer and the lower layer, wherein the upper metallic layer, the lower layer, and the nano sensor are vertically aligned, wherein the nano sensor comprises a physical parameter that changes to measure liquid, gas, chemical, or biological object concentration." *See* Exhibit D.

28. Defendant Aernos developed, develops, used, uses, sells, implements, and distributes nano sensor devices including without limitation the AerIoT device ("Accused Product").

29. A claim chart comparing Claim 19 of the '391 Patent to the Accused Products is attached as **Exhibit D**.

30. The Accused Product is a nano gas sensor device. *See* Exhibit D, p. 1.

31. The Accused Product includes a deposited upper metallic layer. *See* Exhibit D, p. 2.

32. The Accused Product includes a silicon lower layer. *See* Exhibit D, p. 3.

33. The Accused Product includes a nano sensor array that detects multiple gases simultaneously. *See* Exhibit D, p. 3.

34. The Accused Product includes a sensor having electrical properties that are tracked to determine levels of gas detection. *See* Exhibit D, p. 4.

35. Thus, Aernos infringes at least Claim 19 of the '391 Patent.

36. Plaintiff has been, and will continue to be, irreparably harmed by Aernos' ongoing infringement of the '391 Patent.

37. As a direct and proximate result of Aernos's infringement of the '391 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be determined, including but not limited to Plaintiff's lost profits and/or a reasonable royalty.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for relief against Defendant as follows:

A. In favor of Plaintiff that Defendant has infringed one or more claims of the '814 and '391 Patents, either literally or under the doctrine of equivalents;

B. Requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '814 and '391 Patents as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

C. For such other and further relief, as may be just and equitable.

**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: April 11, 2019

Respectfully submitted,

*Of Counsel:*

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