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10 Attorneys for Plaintiff  
TECHNICAL LED INTELLECTUAL  
PROPERTY, LLC  
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12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA  
14

15 TECHNICAL LED INTELLECTUAL  
PROPERTY, LLC, a Delaware limited  
16 liability company,

17 Plaintiff,

18 v.

19 TP-Link North America Inc., a  
California corporation, and  
20

21 TP-Link USA Corporation., a  
California corporation

22 Defendants.  
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Case No.

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

**DEMAND FOR JURY TRIAL**

1 This is an action for patent infringement in which Technical LED Intellectual  
2 Property, LLC (“Technical LED” or “Plaintiff”) makes the following allegations  
3 against TP-Link North America, Inc. (“TP-Link Inc.” or “Defendant”) and TP-Link  
4 USA Corporation (“TP-Link USA” or Defendant); the two defendants may be  
5 collectively referred to as “Defendants.” Headings are interposed for convenience;  
6 all allegations are deemed incorporated into each ground of this complaint as  
7 though separately re-alleged and are based upon investigation made by Plaintiff’s  
8 attorney and on information and belief as follows:

9 **PARTIES**

10 1. Plaintiff Technical LED is a Delaware limited liability company, with  
11 its principal place of business located at 251 Little Falls Dr., Wilmington, DE 19808.

12 2. Defendant TP-Link Inc. is a California Corporation and has a principal  
13 place of business at 145 South State College Blvd., Suite 400, Brea, CA 92821. TP-  
14 Link Inc. imports and sells network products under the KASA brand, including LED  
15 lighting products.

16 3. Defendant TP-Link USA, is a California Corporation and has a principal  
17 place of business at 145 South State College Blvd., Suite 400, Brea, CA 92821. TP-  
18 Link USA, sells network products under the KASA brand, including LED lighting  
19 products

20  
21 **JURISDICTION AND VENUE**

22 4. This action arises under the patent laws of the United States, Title 35 of  
23 the United States Code. This Court has subject matter jurisdiction pursuant to 28  
24 U.S.C. §§ 1331 and 1338(a).

25 5. Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b).  
26 Defendants TP-Link Inc and TP-Link USA, both, reside in California and have  
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1 transacted business in this district, and have committed and/or induced acts of patent  
2 infringement in this district.

3 6. Defendants are subject to this Court’s specific and general personal  
4 jurisdiction pursuant to due process and/or California’s Long Arm Statue, due at least  
5 to their substantial business in this forum, including: (i) at least a portion of the  
6 infringements alleged herein; (ii) regularly doing or soliciting business, engaging in  
7 other persistent courses of conduct, and/or deriving substantial revenue from goods  
8 and services provided to individuals in California and in this Judicial District; and  
9 having a regular and established place of business in this Judicial District.

10  
11 **COUNT I**

12 **Infringement of U.S. Patent No. RE41,685**

13 6. Plaintiff is the owner by assignment of United States Patent No.  
14 RE41,685 (“the ’685 Patent”) titled “Light Source with Non-White and Phosphor-  
15 Based White LED Devices and LCD Assembly.” The ’685 Patent reissued on  
16 September 14, 2010. A true and correct copy of the ’685 Patent is attached as Exhibit  
17 A.

18 7. Defendants and each of them, directly or through intermediaries have  
19 been and are now infringing the ‘685 Patent in the State of California, in this judicial  
20 district, and elsewhere in the United States, by, making, using, providing, supplying,  
21 distributing, selling, and/or offering for sale products (including at least the website  
22 at [www.kasasmart.com](http://www.kasasmart.com)) further including its smart wifi enabled color changing lights  
23 and similar type assemblies, comprising a light source that infringes one or more  
24 claims of the ’685 Patent and particularly, e.g., claims 10 through 14 of the ‘685  
25 Patent. The ‘685 Patent reads on Defendants wifi enabled smart lights as set forth in  
26 the exemplary claims chart attached as Exhibit B.



1           3.     A judgment and order requiring Defendants and each of them pay to  
2 Plaintiff its damages, attorneys fees, costs, expenses, and prejudgment and post-  
3 judgment interest for Defendant's infringement and willful infringement of the '685  
4 Patent as provided under 35 U.S.C. § 284, and an accounting of ongoing post-  
5 judgment infringement; and  
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7           4.     Any and all other relief, at law or equity, to which Plaintiff may show  
8 itself to be entitled.  
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10           DATED May 30, 2019.

11                           Respectfully submitted,  
12                           /s/ Brandon C. Fernald  
13                           Brandon C. Fernald  
14                           Attorneys for Plaintiff  
15                           Technical LED Intellectual Property, LLC  
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**DEMAND FOR JURY TRIAL**

Technical LED, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

DATED May 30, 2019.

Respectfully submitted,  
/s/ Brandon C. Fernald  
Brandon C. Fernald  
Attorneys for Plaintiff  
Technical LED Intellectual Property, LLC