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6 Attorneys for Plaintiff
MAGNACROSS LLC, a Texas limited liability company

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
10 **LOS ANGELES DIVISION**

11 **Magnacross LLC,**
12 Plaintiff,
13 v.
14 **Iogear, Inc.,**
15 Defendant.

Case No.
Patent Case
Jury Trial Demanded

16 **COMPLAINT FOR PATENT INFRINGEMENT**

17 Plaintiff Magnacross LLC (“Plaintiff”), through its attorneys, complains of Iogear, Inc.
18 (“Defendant”), and alleges the following:

19 **PARTIES**

20 1. Plaintiff Magnacross LLC is a corporation organized and existing under the laws of
21 Texas that maintains its principal place of business at 15922 Eldorado Pkwy Suite 500 #1572,
22 Frisco, TX 75035.

23 2. Defendant Iogear, Inc. is a corporation organized and existing under the laws of
24 California that maintains an established place of business at 15365 Barranca Pkwy, Irvine, CA
25 92618.

26 **JURISDICTION**

1 and/or importing, without limitation, at least the Defendant products identified in the charts
2 incorporated into this Count below (among the “Exemplary Defendant Products”) that infringe at
3 least the exemplary claims of the ’304 Patent also identified in the charts incorporated into this
4 Count below (the “Exemplary ’304 Patent Claims”) literally or by the doctrine of equivalents. On
5 information and belief, numerous other devices that infringe the claims of the ’304 Patent have been
6 made, used, sold, imported, and offered for sale by Defendant and/or its customers.

7 12. Defendant also has and continues to directly infringe, literally or under the doctrine
8 of equivalents, the Exemplary ’304 Patent Claims, by having its employees internally test and use
9 these Exemplary Products.

10 13. Exhibit 2 includes charts comparing the Exemplary ’304 Patent Claims to the
11 Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products
12 practice the technology claimed by the ’304 Patent. Accordingly, the Exemplary Defendant Products
13 incorporated in these charts satisfy all elements of the Exemplary ’304 Patent Claims.

14 14. Plaintiff therefore incorporates by reference in its allegations herein the claim charts
15 of Exhibit 2.

16 15. Plaintiff is entitled to recover damages adequate to compensate for Defendant’s
17 infringement.

18 **JURY DEMAND**

19 16. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully
20 requests a trial by jury on all issues so triable.

21 **PRAYER FOR RELIEF**

22 WHEREFORE, Plaintiff respectfully requests the following relief:

- 23 A. A judgment that the ’304 Patent is valid and enforceable;
24 B. A judgment that Defendant has infringed one or more claims of the ’304 Patent;
25 C. An accounting of all damages not presented at trial;
26 D. A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284
27 for Defendant’s past infringement, and any continuing or future infringement of
28

1 the Patent-in-Suit, up until the date such judgment is entered, including pre- or
2 post-judgment interest, costs, and disbursements as justified under 35 U.S.C. § 284
3 and, if necessary, to adequately compensate Plaintiff for Defendant's infringement,
4 an accounting:

- 5
- 6 i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285
7 and that Plaintiff be awarded its reasonable attorneys' fees against Defendant
8 that it incurs in prosecuting this action;
- 9 ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this
10 action; and
- 11 iii. that Plaintiff be awarded such further relief at law or in equity as the Court
12 deems just and proper.
- 13

14 July 30, 2020

15 OF COUNSEL:

16 Isaac Rabicoff
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Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2020, I electronically filed the above documents with the Clerk of Court using CM/ECF which will send electronic notification of such filings to all registered counsel.

/s/Steven W. Ritcheson
Steven W. Ritcheson