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Attorneys for Plaintiffs,
AA Lighting, Inc.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

AA LIGHTING, INC., a California
corporation,

Plaintiff,

vs.

GLOBE ELECTRIC COMPANY
INC., a Canadian corporation,

Defendants.

Case No.:

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff AA LIGHTING, INC. ("Plaintiff") hereby files this Complaint
against Defendant GLOBE ELECTRIC COMPANY INC. ("Defendant") and
alleges as follows:

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THE PARTIES

1
2 1. Plaintiff is a corporation organized under the laws of the State of
3 California, with its principal place of business located at 151 Blue Crystal Dr,
4 Walnut, CA 91789.

5 2. Upon information and belief, Defendant is a corporation organized
6 under the laws of the country of Canada, with its principal place of business located
7 at 150 Oneida, Montreal, Quebec, Canada, H9R 1A8.

8
9 **JURISDICTION AND VENUE**

10 3. This is an action for patent infringement arising under the patent laws
11 of the United States, 35 U.S.C. § 271 *et seq.*

12 4. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and
13 1338.

14 5. This Court has specific personal jurisdiction over Defendant because
15 Defendant has committed and continues to commit acts of infringement in violation
16 of 35 U.S.C. § 271, and offers for sale or sells, or aids, abets, and induces the sale
17 and offer for sale, of infringing products in the State of California and to residents
18 of the State of California, including in this District. Furthermore, the acts by
19 Defendant injure Plaintiff within this District, and, upon information and belief,
20 Defendant derives substantial revenue from the infringing products within this
21 District and expects its actions to have consequences within this District.

1 6. Venue is proper within this District under 28 U.S.C. § 1400(b) because
2 a substantial part of the events or omissions giving rise to the claims occurred in this
3 District and Defendant directly targets business activities towards consumers in the
4 State of California and this District.

5
6 **THE ACCUSED PRODUCTS**

7 7. Plaintiff is the exclusive licensee of U.S. Patent Nos. 7,232,251 (the
8 “251 Patent”), 7,455,444 (the “444 Patent”), 10,487,999 (the “999 Patent”),
9 10,753,561 (the “561 Patent”), 11,082,664 (the “664 Patent”), 11,098,863 (the “863
10 Patent”), and 11,125,401 (the “401 Patent”) (collectively, the “Asserted Patents”).
11 Copies of each of the Asserted Patents are attached as Exhibit 1.

12 8. Each of the Asserted Patents are valid, subsisting, and enforceable and
13 relate to various patent claims for night lights.

14 9. Upon information and belief, Defendant has made, used, offered for
15 sale, sold, distributed, and/or imported into the United States six (6) Accused
16 Products, each of which infringes upon at least one (1) of the Asserted Patents,
17 without authority or license from Plaintiff.

18 10. Upon information and belief, Defendant directly infringes and
19 continues to infringe claims of the Patents by making, using, offering for sale,
20 selling, distributing, and/or importing the Accused Products.

1 11. Upon information and belief, Defendant has induced and continues to
2 induce users of the Accused Products to use them in their normal and customary way
3 to infringe the Asserted Patents.

4 12. By making, using, offering for sale, selling, distributing, and/or
5 importing the Accused Products, Defendant has injured Plaintiff and is liable to for
6 infringement of the Asserted Patents pursuant to 35 U.S.C. § 271.

7 13. Defendant performed the acts that constitute infringement of the
8 Asserted Patents with knowledge of the Asserted Patents and with knowledge, or
9 willful blindness to the probability, that the direct, induced, and contributory acts
10 would constitute infringement.

11
12 **FIRST CAUSE OF ACTION**
 (Infringement of the Patents)

13 14. Plaintiff repeats, realleges, and incorporates by reference paragraphs 1
14 through 9 of this Complaint as though fully set forth herein.

15 15. Defendant has committed acts of infringement under 35 U.S.C. §§ 271
16 and 289 and continues to infringe the Asserted Patents by making, using, offering
17 for sale, selling, distributing, and/or importing into the United States the various
18 Accused Products that infringe the various Asserted Patents as set forth below:

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20 ///

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- Whale Night Light (“Accused Product 1”)
 - Infringes upon:
 - ✧ The ’251 Patent: claims 1-2, 4-7, 9 and 11.
 - ✧ The ’444 Patent: claim 1.



‘251 Patent	Accused Product 1
<p>1. A night light with fiber optics, comprising: light means for emitting light; at least one prong means built into said night light for supplying electricity to said light means when said prong means is connected with a power source; at least one main object; fiber optic means attached to said main object for transmitting light from said light means to form a plurality of lighted spots, said fiber optic means being arranged in bundles of optical fibers; and IC means for controlling said light means to provide predetermined illumination functions and effects.</p>	<p>Structure: A night light with fiber optics comprising: light means for emitting light; at least one prong built into the night light to supply power to the night light; at least one main object which the fiber optics are attached to the said object; and an integrated circuit means for controlling said light means to provide illumination.</p>
<p>2. A night light as claimed in claim 1, wherein said light means is selected from the group consisting of at least one LED; EL, OEL, or OLED element; gas filled bulb; fluorescent tube, black light; neon tube; strobe light; neon bulb; discharge device; and combinations of any of the foregoing lighting elements.</p>	<p>Structure: A night light with the night light being at least one selected from the following: LED, EL, OEL, OLED, gas-filled bulb, fluorescent tube, black light, neon tube, strobe light, neon bulb, discharge device, or any combination of the above but not limited to the combination.</p>

1	4. A night light as claimed in claim 1, wherein said main object includes a body and at least one of a stencil, front piece, cover, and display surface, wherein said at least one of a stencil, front piece, cover, and display surface has a predetermined design, indicia, shape, or configuration.	
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4	5. A night light as claimed in claim 1, wherein said main object is made from a material selected from the group consisting of metal, glass, pottery, wood, ceramic, porcelain, viscous-mud related material, plastic, poly resins, plastic resins, paper, bamboo, and textile.	Structure: A night light includes a body and at least one of a stencil, front piece, cover, and display surface, where in the above mentioned have predetermined design, indicia, shape, or configuration. Furthermore, the main body is made of materials selected from metal, glass, pottery, wood, ceramic, porcelain, viscous-mud, plastic, poly-resins, plastic-resins, paper, bamboo, or textile. Also, the main body consists of a toy, blow-molded unit, textile unit, seasonal unit, stuffed toy, plastic unit, metal unit, porcelain unit, ceramic unit, etc.
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7	6. A night light as claimed in claim 1, wherein said effects controlled by the IC means include one or more of the following effects: steady-on, chasing, random, pair flashing, fade in/fade out, or scan effects.	
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10	7. A night light as claimed in claim 1, wherein said main object is selected from the group consisting of a toy unit, gift unit, stuffed toy unit, blow0molded unit, textile unit, seasonal unit, plastic unit metal unit, porcelain unit, ceramic unit, viscous-mud unit, painting unit, poster unit, sign unit, photo unit, doll unit, promotion unit, advertisement unit, give away unit, holiday items, artificial flower, lava unit, aquarium unit, and water ball unit.	
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14	9. A night light as claimed in claim 1, wherein said fiber optic means are arranged on the main object and light is emitted from ends of said optical fibers.	Structure: A night light device comprising the illumination through the end of the fiber optics, wherein the fiber optics are settled on the main object housing.
15		
16	11. A night light as claimed in claim 1, further comprising additional said light means for providing different lighting functions.	Structure: A night light comprises additional light means for providing different light functions.
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18	'444 Patent	Accused Product 1
19	1. A multiple light source night light with a fiber optics unit, including: first and second light source sets within the night light, each of the light source providing a different light performance, wherein the first and second light source sets are selected from the group consisting of at least one LED, EL, OLED, neon bulb, gas	Structure: A night light consists of: the first and second light source which are selected from LED, EL, OLED, neon bulb, gas-filled bulb, incandescent bulb, fluorescent tube, halogen bulb and conventional light means; and
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filled bulb, incandescent bulb, fluorescent tube, halogen bulb and conventional light means, and

wherein said first and second light source sets are sealed within a housing to enable a viewer to see the respective light performances of the light source sets,

the improvement wherein:

the first light source set supplies light beams to the fiber optics unit for providing light effects and the light functions upon being driven by a circuit included in the night light, and

the second light source set supplies light beams that pass in a desired direction through light passages selected from the group consisting of windows, cut-outs, openings, light-transmitting areas of the housing, and holes.

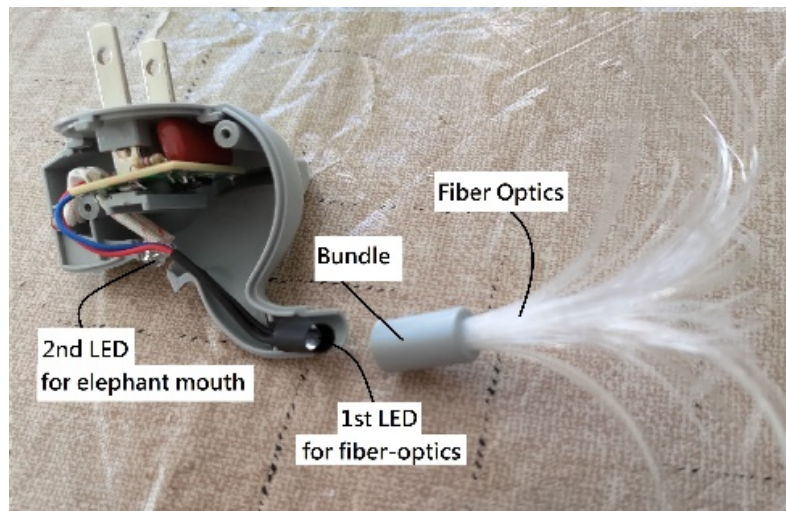
the multiple light sources are sealed within the housing;

the first light source is directed toward the end of the fiber optics, the second light source is directed towards desired surfaces to produce illumination through windows, cut-outs, openings, light-transmitting areas of the housing, and holes.

● Elephant Night Light (“Alleged Product 2”)

➤ Infringes on:

- ✧ The '251 Patent: claims 1-2, 5, 7, 9 and 11.
- ✧ The '444 Patent: claim 1.



'251 Patent	Accused Product 2
<p>1. A night light with fiber optics, comprising: light means for emitting light;</p> <p>at least one prong means built into said night light for supplying electricity to said light means when said prong means is connected with a power source;</p> <p>at least one main object;</p>	<p>Structure:</p> <p>A night light with fiber optics comprising:</p> <p>light means for emitting light;</p> <p>at least one prong built into the night light to supply power to the night light;</p>

1	fiber optic means attached to said main object for transmitting light from said light means to form a plurality of lighted spots, said fiber optic means being arranged in bundles of optical fibers; and	at least one main object which the fiber optics are attached to the said object; and
2	IC means for controlling said light means to provide predetermined illumination functions and effects.	an integrated circuit means for controlling said light means to provide illumination.
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5	2. A night light as claimed in claim 1, wherein said light means is selected from the group consisting of at least one LED; EL, OEL, or OLED element; gas filled bulb; fluorescent tube, black light; neon tube; strobe light; neon bulb; discharge device; and combinations of any of the foregoing lighting elements.	Structure: A night light with the night light being at least one selected from the following: LED, EL, OEL, OLED, gas-filled bulb, fluorescent tube, black light, neon tube, strobe light, neon bulb, discharge device, or any combination of the above but not limited to the combination.
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8	5. A night light as claimed in claim 1, wherein said main object is made from a material selected from the group consisting of metal, glass, pottery, wood, ceramic, porcelain, viscous-mud related material, plastic, poly resins, plastic resins, paper, bamboo, and textile.	Structure: A night light includes a body and at least one of a stencil, front piece, cover, and display surface, where in the above mentioned have predetermined design, indicia, shape, or configuration.
9		
10		
11	7. A night light as claimed in claim 1, wherein said main object is selected from the group consisting of a toy unit, gift unit, stuffed toy unit, blow0molded unit, textile unit, seasonal unit, plastic unit metal unit, porcelain unit, ceramic unit, viscous-mud unit, painting unit, poster unit, sign unit, photo unit, doll unit, promotion unit, advertisement unit, give away unit, holiday items, artificial flower, lava unit, aquarium unit, and water ball unit.	Furthermore, the main body is made of materials selected from metal, glass, pottery, wood, ceramic, porcelain, viscous-mud, plastic, poly-resins, plastic-resins, paper, bamboo, or textile. Also, the main body consists of a toy, blow-molded unit, textile unit, seasonal unit, stuffed toy, plastic unit, metal unit, porcelain unit, ceramic unit, etc.
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16	9. A night light as claimed in claim 1, wherein said fiber optic means are arranged on the main object and light is emitted from ends of said optical fibers.	Structure: A night light device comprising the illumination through the end of the fiber optics, wherein the fiber optics are settled on the main object housing.
17		
18	11. A night light as claimed in claim 1, further comprising additional said light means for providing different lighting functions.	Structure: A night light comprises additional light means for providing different light functions.
19	'444 Patent	Accused Product 2
20	1. A multiple light source night light with a fiber optics unit, including:	Structure: A night light consists of: the first and second light source which are selected from LED, EL, OLED, neon
21		

first and second light source sets within the night light, each of the light source providing a different light performance,

wherein the first and second light source sets are selected from the group consisting of at least one LED, EL, OLED, neon bulb, gas filled bulb, incandescent bulb, fluorescent tube, halogen bulb and conventional light means, and

wherein said first and second light source sets are sealed within a housing to enable a viewer to see the respective light performances of the light source sets,

the improvement wherein:

the first light source set supplies light beams to the fiber optics unit for providing light effects and the light functions upon being driven by a circuit included in the night light, and

the second light source set supplies light beams that pass in a desired direction through light passages selected from the group consisting of windows, cut-outs, openings, light-transmitting areas of the housing, and holes.

bulb, gas-filled bulb, incandescent bulb, fluorescent tube, halogen bulb and conventional light means; and

the multiple light sources are sealed within the housing;

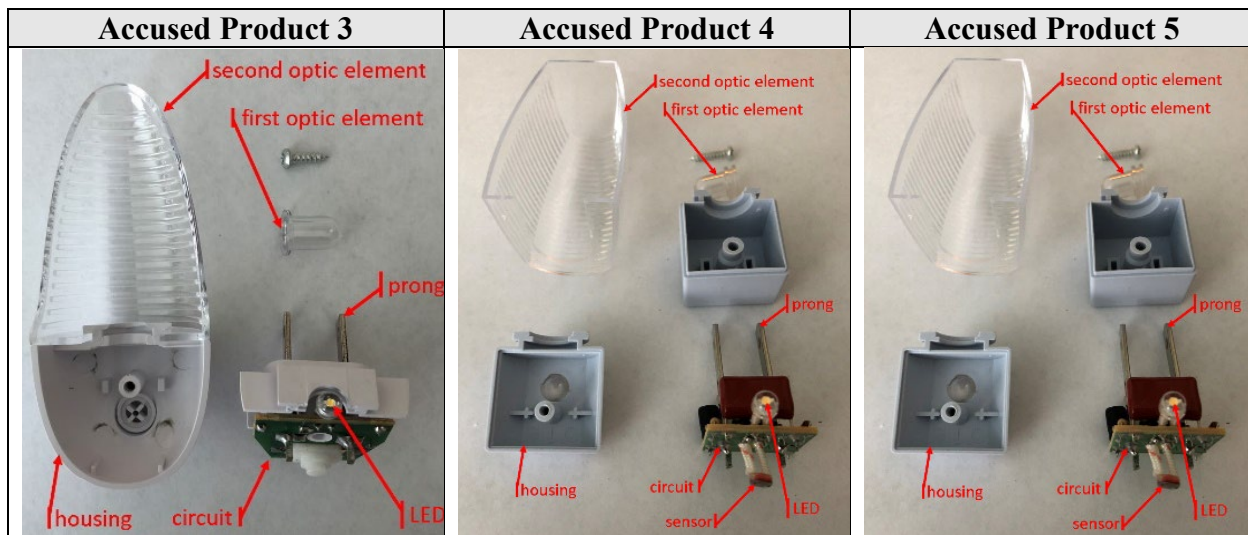
the first light source is directed toward the end of the fiber optics, the second light source is directed towards desired surfaces to produce illumination through windows, cut-outs, openings, light-transmitting areas of the housing, and holes.

- Photo Sensor Light 1PK (“Accused Product 3”), Photo Sensor Light 2PK (“Accused Product 4”), Photo Sensor Light 4PK (“Accused Product 5”)

➤ Infringes on:

- ✧ The ’664 Patent: claims 1-2 and 4-5.
- ✧ The ’404 Patent: claims 6 and 10.
- ✧ The ’999 Patent: claims 1 and 13.
- ✧ The ’863 Patent: claim 1.
- ✧ The ’561 Patent: claim 1.

Accused Product 3	Accused Product 4	Accused Product 5
		



'664 Patent		Accused Products 3, 4, and 5
1. An LED night light, comprising: at least one first optical lens positioned in front or on top of at least one LED to eliminate an LED spotlight effect, or transmit or change a light beam emitted by the at least one LED; and at least one second optical lens that lacks a rear wall to enable light beams exiting from the at least one first optical lens to be transmitted to a wall having an electrical outlet into which the LED night light is plugged and to the second optical lens, wherein the at least one second optical lens is a cover or outer lens assembled with a prong base, and wherein the light beam is shown on the second optical lens in front of the night light, and an outlet wall surface.	Structure: A LED Night light: (a) has 1 st optical lens position in front or top of LED; (b) has 2 nd optical lens that lacks a rear wall to enable light beam existing from 1 st optical lens to transmitted to a home wall has outlet; (c) wherein 2 nd optical lens is outer cover or len; and (d) light beam shown on 2 nd optical lens in front of LED night light and outlet wall.	
2. An LED night light, comprising: at least one first optical lens positioned in front or on top of at least one LED to eliminate an LED spotlight effect, or transmit or change a light beam emitted by the at least one LED; and at least one added second optical lens or outer cover assembled to a prong base of the LED light, and wherein a light beam exiting the first optical lens is directly emitted to at least two surfaces including a surface of (1) the second optical lens or outer cover in front of the LED night light, and (2) a wall having an outlet into which the LED night light is plugged.	Structure: A LED night light: (a) has 1st optical lens position in front or top of LED; (b) has added 2nd optical lens or outer cover assembled to a prong base of LED night light; and (c) light beam existing from 1st optical lens directly emitted to at least two surface including a surface of: (1) send optical lens or outer cover in front of LED night light; and (2) a wall having an outlet into which the LED night light is plugged.	

<p>4. An LED night light, comprising:</p> <p>at least one first optical lens positioned in front, on top, or on a side of at least one LED; and</p> <p>at least one second optical lens, the second optical lens being a unit assembled to a prong unit,</p> <p>wherein the at least one second optical lens is a cover or outer lens without a rear wall, and</p> <p>wherein a light beam exiting the first optical lens is emitted to at least two surfaces including a surface of</p> <p>(1) the second optical lens, and</p> <p>(2) a wall having an outlet into which the LED night light is plugged.</p>	<p>Structure:</p> <p>A LED night light:</p> <p>(a) has 1st optical lens positioned in front, on top, or on a side of at least one LED;</p> <p>(b) has 2nd optical lens being a unit assembled to a prong unit;</p> <p>(c) 2nd optical lens is a cover or outer lens without a rear wall; and</p> <p>(d) light beam exiting the 1st optical lens is emitted to at least two surface including a surface of:</p> <p>(1) the 2nd optical lens; and</p> <p>(2) a wall having an outlet into which the LED night light is plugged.</p>
<p>5. An LED night light, comprising:</p> <p>more than one optical lens to change a narrow angle LED light beam into an LED light beam having a wider area, a changed viewing angle, or a reduced LED spotlight effect,</p> <p>wherein the wider area, changed viewing angle, or reduced LED spotlight effect is created by emission of the narrow angle light beam through a first optical lens and then emission to (1) a surface of a second optical lens, and (2) a surface of a wall having an outlet into which at least one prong of the LED night light is plugged, and</p> <p>wherein the second optical lens is a unit assembled to a prong base and is an outer or cover lens that lacks a rear wall.</p>	<p>Structure:</p> <p>A LED night light:</p> <p>(a) has more than one optical lens to change narrow angle LED light beam having a wider area. A changed viewing angle, or a reduced LED spotlight effect;</p> <p>(b) wider area, viewing angle, or a reduced LED spotlight effect is created by emission of narrow angle LED light beam through a first optical lens and then emission to:</p> <p>(1) a surface of 2nd optical lens; and</p> <p>(2) a surface of a wall having an outlet into which at least one prong of LED night light is plugged,</p> <p>(c) wherein, 2nd optical lens is a unit assembled to a prong base and is an outer or cover lens that lacks a rear wall.</p>
<p>'401 Patent</p>	<p>Accused Products 3, 4, and 5</p>
<p>6. An LED night light, comprising:</p> <p>at least one LED arranged to emit light through a first optical element to at least one of an optical element, optic lens, cartoon unit, light blocked exposed surface, and home wall; and</p> <p>a first optics lens fitted on top or in front of a prong circuit unit or base and in front of, on a side of, or on top of the at least one LED, wherein the first optics lens is at least one of:</p> <p>(A) a flat or planar optics lens that transmits or changes a direction of light beams;</p>	<p>Structure:</p> <p>A LED night light:</p> <p>(a) has LED arranged to emit light through a 1st optical element to at least one optic lens and home wall;</p> <p>(b) 1st optics lens fitted on top or in front of a prong circuit unit or base and in front of, on a side of, or on top of LED;</p> <p>(c) 1st optics lens is at least one of (B) dome or tube unit has a top end to</p>

<p>(B) a cone unit having a sharp tip, or a dome or tube unit having a top end, to cause a light beam to travel back and forth and be reflected and refracted multiple times; and</p> <p>(C) a partial cylinder lens having an opaque, whitening, or textured treatment to cause light beams to travel back and forth and be reflected and refracted multiple times;</p> <p>thereby providing LED illumination without bright lighted spots shown on at least one of:</p> <p>(1) a front lens,</p> <p>(2) a second optic lens in front of or surrounding the first optic lens and that is or has at least one bubble, is textured, or has at least one treatment,</p> <p>(3) one of a cartoon mask, body, or unit having at least one transmitting area or at least one hole,</p> <p>(4) a home wall that is exposed because the second optic lens or a second optic element lacks at least one of a rear, side, and top wall, and</p> <p>(5) a light blocked optic element surface or exposed wall of the night light,</p> <p>wherein the prong circuit unit or base includes a prong, AC-to-DC circuit, circuitry, at least one white color LED, a manual switch, or a photo sensor.</p>	<p>cause a light beam to travel back and forth and be reflected and refracted multiple times, thereby providing LED illumination without bright lighted spots show on at least one of (2) 2nd optics lens in front of or surrounding the first optics lens has at least one treatment, (4) a home wall; and</p> <p>(d) prong circuit unit or base includes a prong, AC-to-DC circuit, circuitry, at least one white color LED, a manual switch, or a phot sensor.</p>
<p>10. An LED night light, comprising:</p> <p>at least one LED arranged to emit light through</p> <p>(A) a first optical lens fitted on top of a prong circuit base or a side of a prong circuit unit, the prong circuit base or prong circuit unit having, inside the base or unit, at least one LED, circuitry, an AC-to-DC circuit, and one of a photo sensor or switch, and</p> <p>(B) a second optical lens or element without at least one of a rear, top, or side wall and that is assembled to a prong circuit base or unit,</p> <p>wherein the first optical lens is at least one of:</p> <p>(1) a tubular, planar, or dome piece fitted on top or in front of the prong base or unit and positioned in front or top of the at least one LED, and</p> <p>(2) a partial cylinder piece on at least one side of the prong base or unit and positioned on a side of the at least one LED;</p>	<p>Structure:</p> <p>A LED night light includes:</p> <p>(a) At least one LED to emit light through:</p> <p>(A) 1st optical lens fitted on top of a prong circuit base or a side of prong circuit unit. Prong base or prong circuit unit having at least one LED, circuitry, an AC-to-DC circuit, and one of a photo sensor or switch; and</p> <p>(B) A 2nd optical lens or element without at least one of rear, top, or side wall and that is assembled to a prong circuit base or unit;</p> <p>(b) 1st optical lens is at least one of:</p> <p>(a) tubular, planar, or dome piece fitted on top or in front of prong base or unit and positioned in front or top of the at least one LED;</p> <p>(c) Light beam existing the 1st</p>

<p>to (i) prevent people from touching the at least one LED and parts inside the prong base or unit, or (ii) provide illumination without bright light spots,</p> <p>wherein light beams exiting the first optical lens are emitted to</p> <p>A. an inner surface of the second optical lens or element; and</p> <p>B. a home wall having an outlet for receiving a night light prong, the home wall being exposed because the second optical lens or element lacks a rear wall and the home wall is lighted by a light beam exiting from the first optical lens or element,</p> <p>wherein the second optical lens or element is at least one of:</p> <p>(1) an optic lens having at least one of: (1-1) a reflective, (1-2) refractive, (1-3) textured, and (1-4) reflective and refractive property, and</p> <p>(2) a cartoon or movie character unit, body, or mask; having at least one of (2-1) art, (2-2) design, (2-3) a shape, (2-4) painting, (2-5) printing, (2-6) colors, (2-7) at least one light transmitting area, (2-8) at least one window, (2-9) at least one opening, and (2-10) at least one cutout.</p>	<p>optical lens are emitted to (A) an inner surface of 2nd optics lens or element,</p> <p>(C) A home wall having an outlet for receiving a night light prong.</p> <p>(d) 2nd optical lens or element is at least one of:</p> <p>(1) An optic lens having at least one of (1-1) a reflective, (1-2) refractive, (1-3) textured, and (1-4) reflective and refractive property.</p>
‘863 Patent	Accused Products 3, 4, and 5
<p>1. A multiple function LED night light, comprising:</p> <p>a lower prong base;</p> <p>a first optics lens having a flat or dome structure and built in a top of the lower prong base; and</p> <p>a second optics lens that lacks a rear housing or back wall,</p> <p>at least one LED configured to emit light beams that pass through the first optics lens and are emitted to the second optics lens,</p> <p>wherein the lower prong base has built in (1) an AC-to-DC circuit, (2) the at least one LED, (3) a photo sensor or manual switch, and (4) a circuit for controlling the at least one LED to provide surface or area light illumination shown on (1) a front surface of the night light and not on a side wall, and (2) a home wall where the night light is plugged into an electrical outlet.</p>	<p>Structure:</p> <p>A multiple function LED night light, comprising:</p> <p>a lower prong base;</p> <p>a first optics lens having a flat or dome structure and built in a top of the lower prong base; and</p> <p>a second optics lens that lacks a rear housing or back wall,</p> <p>at least one LED configured to emit light beams that pass through the first optics lens and are emitted to the second optics lens; wherein the lower prong base has built in (1) an AC-to-DC circuit, (2) the at least one LED, (3) a photo sensor or manual switch, and (4) a circuit for controlling the at least one LED to provide surface or area light illumination shown on (1) a front surface of the night light and not on a</p>

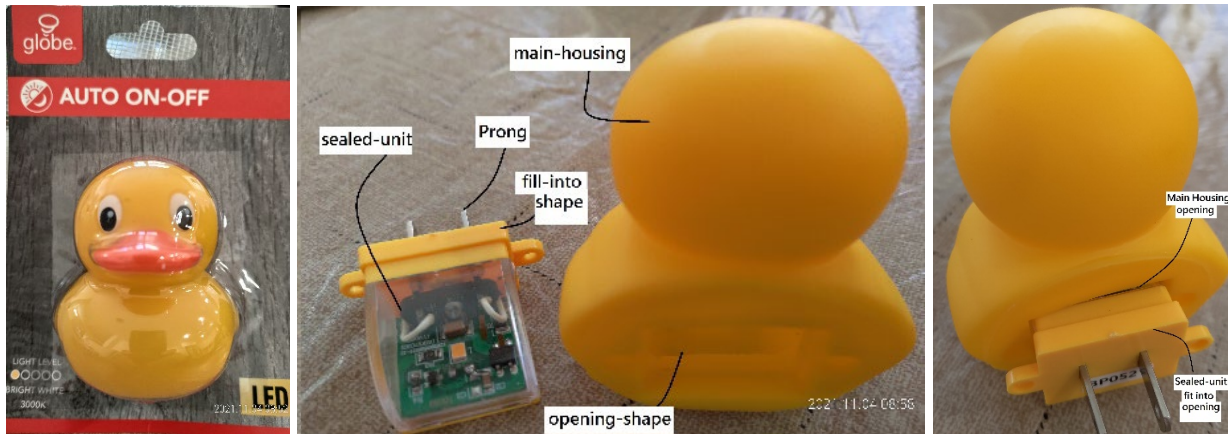
	side wall, and (2) a home wall where the night light is plugged into an electrical outlet.
'561 Patent	Accused Products 3, 4, and 5
<p>1. An LED night light, comprising: a prong unit having at least one prong to connect with an AC wall outlet; an outer cover; and a built-in AC-to-DC circuit for supplying DC to at least one LED for providing a light performance shown on the outer cover, wherein: the prong unit includes at least one built-in first optics piece or lens, located in front or on a side of the at least one LED, to prevent people from touching the at least one LED, to emit light, or to provide illumination without an LED bright spot effect, the night light includes a second optic piece or lens that forms said outer cover and includes: (A) a front wall, but lacks at least one of the following walls: a top wall, a side wall, and a rear wall, so that light beams exiting from the first optics lens or piece are emitted directly to a wall of a home, and (B) a base having at least one of shaped openings, edges, and a body configured for assembly to the prong unit, and the first optics lens or piece, the second optics lens or piece, or both the first optics lens or piece and the second optics lens or piece: (a) is textured, (b) is treated, (c) has protective, reflective, or refractive properties, (d) is a cartoon character piece with painting or colors, (e) is a licensee mask or miniature piece with at least one shaped opening or window, (f) has a whitened shape or treatment, or (g) is a transparent piece with treatment.</p>	<p>Structure: An LED night light, comprising: a prong unit having at least one prong to connect with an AC wall outlet; an outer cover; and a built-in AC-to-DC circuit for supplying DC to at least one LED for providing a light performance shown on the outer cover, wherein: the prong unit includes at least one built-in first optics piece or lens, located in front or on a side of the at least one LED, to prevent people from touching the at least one LED, to emit light, or to provide illumination without an LED bright spot effect; the night light includes a second optic piece or lens that forms said outer cover and includes: (A) a front wall, but lacks at least one of the following walls: a top wall, a side wall, and a rear wall, so that light beams exiting from the first optics lens or piece are emitted directly to a wall of a home, and (B) a base having at least one of shaped openings, edges, and a body configured for assembly to the prong unit, and the first optics lens or piece, the second optics lens or piece, or both the first optics lens or piece and the second optics lens or piece: (a) is textured, (b) is treated, (c) has protective, reflective, or refractive properties, (d) is a cartoon character piece with painting or colors, (e) is a licensee mask or miniature piece with at least one shaped opening or window, (f) has a whitened shape or treatment, or (g) is a transparent piece with treatment.</p>

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● Duck Night Light (“Accused Product 6”)

➤ Infringes on:

✧ The ’158 Patent: claim 8.



‘158 Patent	Alleged Product 6
<p>8. An LED light device with special effects, comprising:</p> <p>at least one LED fitted into a laboratory-certified sealed unit and a receiving means for interchangeably receiving a variety of different shades to form a final LED light device,</p> <p>wherein said shades are made of a material selected from the group consisting of plastic, paper, wood, laser pieces, hologram pieces, an air bag, a balloon, assembly pieces, light block-out elements, and a grill to provide said LED light device with said special effects and an eye-catching appearance,</p> <p>wherein because all electrical parts are contained within said sealed unit, said final light device requires no additional laboratory certification when one of said shades is replaced by a different one of said shades, irrespective of the material of the shades,</p> <p>wherein a power source for said LED light device is one of a battery power source, and electrical outlets, and interchangeable AC and DC power sources, and</p> <p>wherein said light device is a desk top or outlet plug-in light device.</p>	<p>Structure:</p> <p>An LED light device with special effects, comprising: at least one LED fitted into a laboratory-certified sealed unit and a receiving means for interchangeably receiving a variety of different shades to form a final LED light device;</p> <p>wherein said shades are made of a material selected from the group consisting of plastic, an air bag, a balloon, assembly pieces, light block-out elements, to provide said LED light device with said special effects and an eye-catching appearance;</p> <p>wherein because all electrical parts are contained within said sealed unit, said final light device requires no additional laboratory certification when one of said shades is replaced by a different one of said shades, irrespective of the material of the shades,</p> <p>wherein a power source for said LED light device is one of a battery power source, and electrical outlets, and interchangeable AC and DC power sources, and wherein said light device is a desktop or outlet plug-in light device.</p>

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1 16. Plaintiff has suffered damages by reason of Defendant's infringing
2 conduct and is entitled to monetary damages in an amount adequate to compensate
3 for Defendant's infringement. The damages suffered by Plaintiff are in an amount
4 that constitutes at least a reasonable royalty for all of Defendant's sales of the
5 Accused Products during the past six (6) years and for any future sales during the
6 enforcement period of the Asserted Patents, together with interest and costs as fixed
7 by the Court and according to proof at trial.

8
9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff prays for relief against Defendant as follows:

11 1. A judgment that Defendant has infringed, contributorily infringed,
12 and/or induced infringement literally and/or under the doctrine of equivalents, each
13 of the Asserted Patents;

14 2. An order and judgment permanently enjoining Defendant and its
15 officers, directors, agents, servants, employees, affiliates, attorneys, and all others
16 acting in privity or in concert with it, and its parents, subsidiaries, divisions,
17 successors and assigns, from further acts of infringement of the Asserted Patents;

18 3. A declaration that this case is exceptional and awarding Plaintiff
19 reasonable attorneys' fees and expenses in accordance with 35 U.S.C. § 284;

20 4. A judgment awarding Plaintiff \$2,000,000.00 or according to proof, as
21 well as treble damages for willful infringement under 35 U.S.C. § 284 and pre-

1 judgment and post-judgment interest and costs; and

2 5. Such other and further relief as the Court deems just and proper.

3
4 DATED: December 27, 2021

Respectfully submitted,

5 /s/ Tommy SF Wang

6 Tommy SF Wang (SBN: 272409)

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9 Attorneys for Plaintiff,

10 AA Lighting, Inc.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands trial by jury in this action of all issues so triable.

DATED: December 27, 2021

Respectfully submitted,

/s/ Tommy SF Wang

Tommy SF Wang (SBN: 272409)

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