

1 RUSS, AUGUST & KABAT
 Reza Mirzaie (CA SBN 246953)
 2 rmirzaie@raklaw.com
 Brett E. Cooper (admitted *pro hac vice*)
 3 bcooper@raklaw.com
 Marc A. Fenster (CA SBN 181067)
 4 mfenster@raklaw.com
 Seth Hasenour (admitted *pro hac vice*)
 5 shasenour@raklaw.com
 Drew B. Hollander (admitted *pro hac vice*)
 6 dhollander@raklaw.com
 Christian W. Conkle (CA SBN 306374)
 7 cconkle@raklaw.com
 12424 Wilshire Boulevard, 12th Floor
 8 Los Angeles, California 90025
 Telephone: (310) 826-7474
 9 Facsimile: (310) 826-6991

10 Attorneys for Plaintiff
 Scramoge Technology Limited

11
 12
 13 **UNITED STATES DISTRICT COURT**
 14 **CENTRAL DISTRICT OF CALIFORNIA**

15
 16 SCRAMOGE TECHNOLOGY LTD.,
 17 Plaintiff,
 18 vs.
 19 BELKIN INTERNATIONAL, INC.,
 20 Defendant.
 21

Case No. 2:21-cv-08035-DOC-ADS
**AMENDED COMPLAINT FOR
 PATENT INFRINGEMENT**
JURY TRIAL DEMANDED

RUSS, AUGUST & KABAT

1 This is an action for patent infringement arising under the Patent Laws of the
2 United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Scramoge
3 Technology Limited (“Plaintiff” or “Scramoge”) makes the following allegations
4 against Defendant Belkin International, Inc. (“Defendant” or “Belkin”):

5 **INTRODUCTION**

6 1. This amended complaint arises from Belkin’s unlawful infringement of
7 the following United States patents owned by Plaintiff, which relate to
8 improvements in wireless charging of mobile devices: United States Patent Nos.
9 9,490,652 (“the ’652 Patent”), 10,193,392 (“the ’392 Patent”), and 7,825,537
10 (“the ’537 Patent”) (collectively, the “Asserted Patents”).

11 **PARTIES**

12 2. Plaintiff Scramoge Technology Limited is a limited liability company
13 organized and existing under the law of Ireland, with its principal place of business
14 at The Hyde Building, Suite 23, The Park, Carrickmines, Dublin 18, Ireland.
15 Scramoge is the sole owner by assignment of all right, title, and interest in the
16 Asserted Patents, including the right to recover damages for past, present, and future
17 infringement.

18 3. On information and belief, Defendant Belkin International, Inc. is a
19 corporation organized under the laws of Delaware, with its principal place of
20 business at 12045 E. Waterfront Dr., Playa Vista, California 90094.

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 original subject matter jurisdiction pursuant
24 to 28 U.S.C. §§ 1331 and 1338(a).

25 5. This Court has personal jurisdiction over Defendant Belkin
26 International, Inc. in this action because Defendant has committed acts within this
27 District giving rise to this action and has established minimum contacts with this
28 forum such that the exercise of jurisdiction over Defendant would not offend

RUSS, AUGUST & KABAT

RUSS, AUGUST & KABAT

1 traditional notions of fair play and substantial justice. Defendant, directly and
2 through subsidiaries or intermediaries, has committed and continues to commit acts
3 of infringement in this District by, among other things, importing, offering to sell,
4 and selling Belkin-branded products that infringe the Asserted Patents.

5 6. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).
6 Defendant Belkin International, Inc. is registered to do business in California.
7 Additionally, upon information and belief, Belkin has transacted business in this
8 District and has committed acts of direct and indirect infringement in this District
9 by, among other things, making, using, offering to sell, selling, and importing
10 products that infringe the Asserted Patents. Belkin has a regular and established
11 place of business in this District, including at 12045 E. Waterfront Dr., Playa Vista,
12 California 90094.

13 **COUNT I**

14 **INFRINGEMENT OF U.S. PATENT NO. 9,490,652**

15 7. Plaintiff realleges and incorporates by reference the foregoing
16 paragraphs as if fully set forth herein.

17 8. Plaintiff owns by assignment all rights, title, and interest, including the
18 right to recover damages for past, present, and future infringement, in U.S. Patent
19 No. 9,490,652, entitled “Wireless charger equipped with auxiliary power supply and
20 auxiliary power device.” The ’652 Patent was duly and legally issued by the United
21 States Patent and Trademark Office on November 8, 2016. A true and correct copy
22 of the ’652 Patent is attached as Exhibit 1.

23 9. On information and belief, Belkin makes, uses, offers for sale, sells,
24 and/or imports certain products, including without limitation the Belkin-branded
25 BoostCharge Magnetic Wireless Power Bank 2.5K, BoostCharge Magnetic Portable
26 Wireless Charger 10k, and BoostCharge Power Bank 2K for Apple Watch
27 (“Accused Products”), that directly infringe, literally and/or under the doctrine of
28 equivalents, one or more claims of the ’652 Patent. Identification of the accused

RUSS, AUGUST & KABAT

1 products will be provided in Plaintiff’s infringement contentions pursuant to the
2 Court’s scheduling order.

3 10. The Accused Products satisfy all claim limitations of one or more
4 claims of the ’652 Patent. A claim chart comparing exemplary independent claim 1
5 of the ’652 Patent to representative Accused Products is attached as Exhibit 2.

6 11. By making, using, offering for sale, selling and/or importing into the
7 United States the Accused Products, Belkin has injured Plaintiff and is liable for
8 infringement of the ’652 Patent pursuant to 35 U.S.C. § 271(a).

9 12. As a result of Belkin’s infringement of the ’652 Patent, Plaintiff is
10 entitled to monetary damages (past, present, and future) in an amount adequate to
11 compensate for Belkin’s infringement, but in no event less than a reasonable royalty
12 for the use made of the invention by Belkin, together with interest and costs as fixed
13 by the Court.

14 **COUNT II**

15 **INFRINGEMENT OF U.S. PATENT NO. 10,193,392**

16 13. Plaintiff realleges and incorporates by reference the foregoing
17 paragraphs as if fully set forth herein.

18 14. Plaintiff owns by assignment all rights, title, and interest, including the
19 right to recover damages for past, present, and future infringement, in U.S. Patent
20 No. 10,193,392, entitled “Wireless power transfer device and wireless power
21 transfer system.” The ’392 Patent was duly and legally issued by the United States
22 Patent and Trademark Office on January 29, 2019. A true and correct copy of
23 the ’392 Patent is attached as Exhibit 3.

24 15. On information and belief, Belkin makes, uses, offers for sale, sells,
25 and/or imports certain products, including without limitation the Belkin-branded
26 Wireless Charging Pad, BoostUp Wireless Charging Pad, BoostUp Bold Wireless
27 Charging Pad, BoostUp Wireless Charging Stand, BoostUp Special Edition Wireless
28 Charging Dock for iPhone and Apple Watch, BoostUp Wireless Charging Spot,

RUSS, AUGUST & KABAT

1 BoostUp Wireless Charging Vent Mount, Wireless Charging Stand, Studio Qi
2 Wireless Charging Pad, BoostCharge Pro 3-in-1 Wireless Charger with MagSafe
3 15W, BoostCharge Pro 2-in-1 Wireless Charger Stand with MagSafe 15W,
4 BoostCharge 15W Wireless Charging Stand, BoostCharge Magnetic Portable
5 Wireless Charger Pad 7.5W, BoostCharge Magnetic Wireless Power Bank 2.5K,
6 BoostCharge Magnetic Portable Wireless Charger 10k, BoostCharge Power Bank
7 2K for Apple Watch, BoostCharge Magnetic Wireless Charger Stand 7.5W,
8 BoostCharge 3-in-1 Wireless Charger Special Edition for Apple Devices,
9 Soundform Elite Hi-Fi Smart Speaker + Wireless Charger, BoostCharge Wireless
10 Charging Stand + Speaker, BoostCharge Wireless Charging Stand 10W,
11 BoostCharge Dual Wireless Charging Pads, BoostCharge Wireless Charging Pad
12 15W, BoostCharge 10W Wireless Charging Pad + QC 3.0 Wall Charger + Cable,
13 BoostCharge TrueFreedom Pro, BoostCharge 7.5W Wireless Charging Stand –
14 Special Edition, BoostCharge 3-in-1 Wireless Charger for Apple Devices, BoostUp
15 Wireless Charging Dock for iPhone + Apple Watch + USB-A Port, BoostCharge
16 Wireless Car Charger with Vent Mount 10W, BoostCharge UV Sanitizer + Wireless
17 Charger, Wireless Charging Vent Mount 10W – Wireless Car Charger, PowerHouse
18 2-in-1 iPhone and Apple Watch Charging Dock, BoostUp Wireless Charging Pad
19 5W, and BoostCharge Wireless Charging Pad 7.5W Special Edition (“Accused
20 Products”), that directly infringe, literally and/or under the doctrine of equivalents,
21 one or more claims of the ’392 Patent in violation of 35 U.S.C. § 271(a).
22 Identification of the accused products will be provided in Plaintiff’s infringement
23 contentions pursuant to the Court’s scheduling order.

24 16. The Accused Products satisfy all claim limitations of one or more
25 claims of the ’392 Patent. A claim chart comparing exemplary independent claim 1
26 of the ’392 Patent to representative Accused Products is attached as Exhibit 4.

27
28

RUSS, AUGUST & KABAT

1 17. By making, using, offering for sale, selling and/or importing into the
2 United States the Accused Products, Belkin has injured Plaintiff and is liable for
3 infringement of the '392 Patent pursuant to 35 U.S.C. § 271(a).

4 18. As a result of Belkin's infringement of the '392 Patent, Plaintiff is
5 entitled to monetary damages (past, present, and future) in an amount adequate to
6 compensate for Belkin's infringement, but in no event less than a reasonable royalty
7 for the use made of the invention by Belkin, together with interest and costs as fixed
8 by the Court.

9 **COUNT III**

10 **INFRINGEMENT OF U.S. PATENT NO. 7,825,537**

11 19. Plaintiff realleges and incorporates by reference the foregoing
12 paragraphs as if fully set forth herein.

13 20. Plaintiff owns by assignment all rights, title, and interest, including the
14 right to recover damages for past, present, and future infringement, in U.S. Patent
15 No. 7,825,537, entitled "Inductive power transfer system and method." The '537
16 Patent was duly and legally issued by the United States Patent and Trademark Office
17 on November 2, 2010. A true and correct copy of the '537 Patent is attached as
18 Exhibit 5.

19 21. On information and belief, Belkin makes, uses, offers for sale, sells,
20 and/or imports certain products, including without limitation the Belkin-branded
21 Wireless Charging Pad, BoostUp Wireless Charging Pad, BoostUp Bold Wireless
22 Charging Pad, BoostUp Wireless Charging Stand, BoostUp Special Edition Wireless
23 Charging Dock for iPhone and Apple Watch, BoostUp Wireless Charging Spot,
24 BoostUp Wireless Charging Vent Mount, Wireless Charging Stand, Studio Qi
25 Wireless Charging Pad, BoostCharge Pro 3-in-1 Wireless Charger with MagSafe
26 15W, BoostCharge Pro 2-in-1 Wireless Charger Stand with MagSafe 15W,
27 BoostCharge 15W Wireless Charging Stand, BoostCharge Magnetic Portable
28 Wireless Charger Pad 7.5W, BoostCharge Magnetic Wireless Power Bank 2.5K,

RUSS, AUGUST & KABAT

1 BoostCharge Magnetic Portable Wireless Charger 10k, BoostCharge Power Bank
2 2K for Apple Watch, BoostCharge Magnetic Wireless Charger Stand 7.5W,
3 BoostCharge 3-in-1 Wireless Charger Special Edition for Apple Devices,
4 Soundform Elite Hi-Fi Smart Speaker + Wireless Charger, BoostCharge Wireless
5 Charging Stand + Speaker, BoostCharge Wireless Charging Stand 10W,
6 BoostCharge Dual Wireless Charging Pads, BoostCharge Wireless Charging Pad
7 15W, BoostCharge 10W Wireless Charging Pad + QC 3.0 Wall Charger + Cable,
8 BoostCharge TrueFreedom Pro, BoostCharge 7.5W Wireless Charging Stand –
9 Special Edition, BoostCharge 3-in-1 Wireless Charger for Apple Devices, BoostUp
10 Wireless Charging Dock for iPhone + Apple Watch + USB-A Port, BoostCharge
11 Wireless Car Charger with Vent Mount 10W, BoostCharge UV Sanitizer + Wireless
12 Charger, Wireless Charging Vent Mount 10W – Wireless Car Charger, PowerHouse
13 2-in-1 iPhone and Apple Watch Charging Dock, BoostUp Wireless Charging Pad
14 5W, and BoostCharge Wireless Charging Pad 7.5W Special Edition (“Accused
15 Products”), that directly infringe, literally and/or under the doctrine of equivalents,
16 one or more claims of the ’537 Patent, including through Belkin’s own use and/or
17 testing of the Accused Products. Identification of the accused products will be
18 provided in Plaintiff’s infringement contentions pursuant to the Court’s scheduling
19 order.

20 22. The Accused Products satisfy all claim limitations of one or more
21 claims of the ’537 Patent. A claim chart comparing exemplary independent claim 1
22 of the ’537 Patent to representative Accused Products is attached as Exhibit 6.

23 23. Belkin also knowingly and intentionally induces infringement of one or
24 more claims of the ’537 Patent in violation of 35 U.S.C. § 271(b). Before the filing
25 of this Amended Complaint, Belkin has knowledge of the ’537 Patent in as many as
26 four different ways.

1 24. First, on October 15, 2021, Belkin was served with an original
2 complaint alleging infringement of the '537 Patent and the infringing nature of the
3 Accused Products. *See* Dkt. No. 19 (Proof of Service).

4 25. Second, on information and belief, Belkin has knowledge of the '537
5 Patent through co-pending actions filed by Scramoge against its competitors
6 (Mophie Inc. and Anker Innovations Ltd.) and business partners (such as Apple
7 Inc.), which also allege infringement of the '537 Patent by similar wireless chargers
8 and charging power banks as those sold by Belkin. *See Scramoge Technology Ltd.*
9 *v. Mophie Inc.*, No. 8:21-cv-01673-DOC-ADS (C.D. Cal. Oct. 7, 2021); *Scramoge*
10 *Technology Ltd. v. Anker Innovations Ltd., et al.*, No. 5:21-cv-01712-DOC-ADS
11 (C.D. Cal. Oct. 8, 2021); *Scramoge Technology Ltd. v. Apple Inc.*, No. 6:21-cv-
12 01071-ADA (W.D. Tex. Oct. 14, 2021). With respect to its competitors Mophie and
13 Anker, it is plausible that Belkin tracks or is otherwise appraised of patent litigations
14 against other market players in the ordinary course of business and learned of
15 the '537 Patent through the filing of those cases.

16 26. Third, it is also plausible that Belkin's business partners (such as Apple)
17 would inform it (and provide notice, such as for indemnification) of potential
18 liability for Belkin products advertised and sold on their website. *See, e.g.*,
19 <https://www.apple.com/shop/product/HPGA2ZM/A/belkin-boost%E2%86%91charge-pro-3-in-1-wireless-charger-with-magsafe-white?fnode=02ab40d8450069d6f8385ba3913eef282d1bae9a7341c4296bde7c4288a4057c1fdd0bae8a9877c9dc7792ffbfd62b0271718d42154b23806724979cb046bba2605131e6270d781550b5a73eab492c0615271ab261d16a99bd9eea7af2bea274fa8148d934e2d4305ecd298e996e5d66efddcb0ec8266aa3f03be53f24bd4a46> (accused
24 Belkin BoostCharge Pro 3-in-1 Charger sold on Apple website). Indeed, on a
25 December 23, 2021 meet and confer, Belkin's counsel acknowledged that it is aware
26 of Scramoge's pending action against Apple in the United States District Court for
27
28

RUSS, AUGUST & KABAT

1 the Western District of Texas—evidencing perhaps that indemnification
2 communications were and are on-going.

3 27. Fourth, on January 4, 2022, Scramoge sent Belkin a letter outlining its
4 infringement of, *inter alia*, the '537 Patent and demanding that Belkin cease its
5 infringing activities (including but not limited to its inducement and contributory
6 infringement of the '537 Patent) by January 7, 2022. Belkin acknowledged receipt
7 of the letter on January 7, 2022. To date, however, Belkin has not ceased its
8 infringing activities.

9 28. Despite this knowledge obtained as many as four different ways of
10 the '537 Patent, Belkin continues to actively encourage and instruct its customers
11 and end users (for example, through user manuals, online instruction materials, and
12 videos on its website) to use the Accused Products in ways that directly infringe
13 the '537 Patent in an infringing manner. For example, Belkin shows users how to
14 use the exemplary BoostCharge Magnetic Portable Wireless Charger 10K to
15 inductively charge a target unit, *i.e.*, smartphone, in a manner that infringes one or
16 more claims of the '537 Patent:



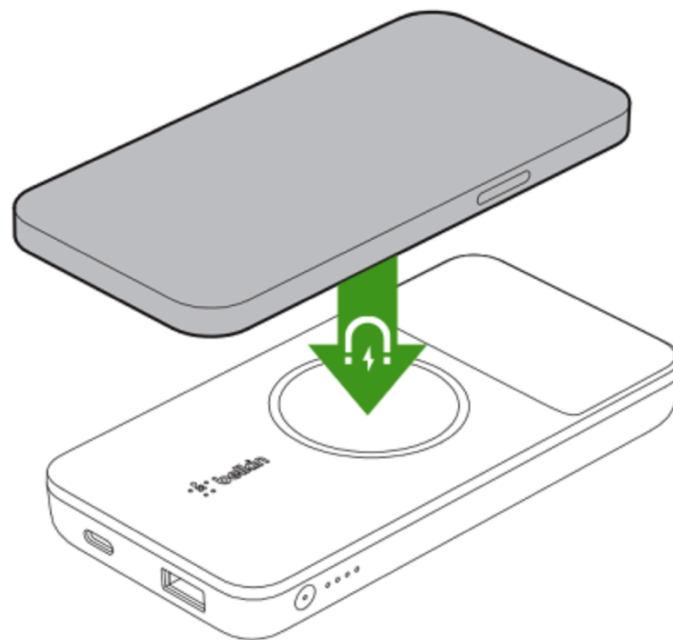
1 See [https://www.belkin.com/us/chargers/power-banks/boost-charge-magnetic-](https://www.belkin.com/us/chargers/power-banks/boost-charge-magnetic-portable-wireless-charger-10k/p/p-bpd001/)
2 [portable-wireless-charger-10k/p/p-bpd001/](https://www.belkin.com/us/chargers/power-banks/boost-charge-magnetic-portable-wireless-charger-10k/p/p-bpd001/). Belkin also provides users with step-
3 by-step instructions on how to use the exemplary BoostCharge Magnetic Portable
4 Wireless Charger 10K to inductively transfer power to a target unit, *i.e.*, a
5 smartphone, in an infringing manner:

6
7 **Step 1:**

8 Make sure your Belkin BPD001 is properly charged.

9
10 **Step 2:**

11 Choose between two ways to charge your phone:



22
23 See <https://www.belkin.com/us/support-article?articleNum=318205> (“Wireless
24 charging – Place the back of your phone on top of the charger then press the button
25 located on the side of the Belkin BPD001.”). Belkin provides similar instructions
26 and user manuals on its website that depict how to use the Accused Products in an
27 infringing manner. See, *e.g.*, [https://www.belkin.com/us/support-](https://www.belkin.com/us/support-article?articleNum=318252)
28 [article?articleNum=318252](https://www.belkin.com/us/support-article?articleNum=318252) (BoostCharge Magnetic Wireless Charger Stand 7.5W

1 User Instructions); <https://www.belkin.com/us/support-article?articleNum=318237>
2 (BoostCharge Magnetic Portable Wireless Charger Pad 7.5W User Instructions);
3 <https://www.belkin.com/us/support-article?articleNum=317861> (BoostCharge Pro
4 2-in-1 Wireless Charger Stand with MagSafe 15W User Instructions). Belkin
5 provides these instructions, user manuals, videos, and other materials knowing and
6 intending (or with willful blindness to the fact) that its customers and end users will
7 commit these infringing acts. Belkin also continues to make, use, offer for sale, sell,
8 and/or import the Accused Products, despite its knowledge of the '537 Patent,
9 thereby specifically intending for and inducing its customers to infringe the '537
10 Patent through the customers' normal and customary use of the Accused Products.

11 29. Belkin has also infringed, and continues to infringe, one or more claims
12 of the '537 Patent by selling, offering for sale, or importing into the United States,
13 the Accused Products, knowing that the Accused Products constitute a material part
14 of the inventions claimed in the '537 Patent, are especially made or adapted to
15 infringe the '537 Patent, and are not staple articles or commodities of commerce
16 suitable for non-infringing use. For the reasons stated above, Belkin has knowledge
17 of the '537 Patent. Despite this knowledge, Belkin is contributorily infringing
18 the '537 Patent in violation of 35 U.S.C. §§ 271(c) and/or (f). For example, Belkin
19 advertises that the Accused Products, including the exemplary BoostCharge
20 Magnetic Portable Wireless Charger 10K, are designed to transfer power to
21 compatible devices:

22 **Charge Wirelessly at Home or On-The-Go**

23 Designed for the iPhone 12 series, this MagSafe compatible wireless charging pad
24 doubles as a 10K power bank to take with you anywhere. Perfect magnetic alignment
25 every time allows you to keep using your phone while it charges without detaching it
26 from the pad, and a slim, portable design fits easily in your purse or pocket. When the
27 pad needs a recharge, pass-through power allows you to plug it in while still powering
28 your phone, so you never have to wait to charge. Get the best of both charging worlds
with a dual-function charging pad and power bank.

1 See [https://www.belkin.com/us/chargers/power-banks/boost-charge-magnetic-](https://www.belkin.com/us/chargers/power-banks/boost-charge-magnetic-portable-wireless-charger-10k/p/p-bpd001/)
2 [portable-wireless-charger-10k/p/p-bpd001/](https://www.belkin.com/us/chargers/power-banks/boost-charge-magnetic-portable-wireless-charger-10k/p/p-bpd001/); see also, e.g.,
3 [https://www.belkin.com/us/chargers/wireless/charging-stands-docks/boost-charge-](https://www.belkin.com/us/chargers/wireless/charging-stands-docks/boost-charge-magnetic-wireless-charger-stand-7-5w/p/p-wib003/)
4 [magnetic-wireless-charger-stand-7-5w/p/p-wib003/](https://www.belkin.com/us/chargers/wireless/charging-stands-docks/boost-charge-magnetic-wireless-charger-stand-7-5w/p/p-wib003/) (Magnetic Wireless Charger
5 Stand 7.5W) (“The perfect alignment of MagSafe delivers efficient and secure
6 charging, with easy one-handed placement.”). Belkin’s wireless power chargers,
7 power banks, and battery packs are base units that constitute a material part of the
8 inventions claimed in the ’537 Patent, are especially made or adapted to infringe
9 the ’573 Patent, and are not staple articles or commodities of commerce suitable for
10 non-infringing use. For example, there are no non-infringing uses for the accused
11 functionality in the Accused Products other than to inductively transfer power to a
12 target unit in an infringing manner.

13 30. By making, using, offering for sale, selling and/or importing into the
14 United States the Accused Products, Belkin has injured Plaintiff and is liable for
15 infringement of the ’537 Patent pursuant to 35 U.S.C. § 271(a), (b), (c), and/or (f).

16 31. As a result of Belkin’s direct infringement of the ’537 Patent, Plaintiff
17 is entitled to monetary damages (past, present, and future) in an amount adequate to
18 compensate for Belkin’s infringement, but in no event less than a reasonable royalty
19 for the use made of the invention by Belkin, together with interest and costs as fixed
20 by the Court.

21 32. As a result of Belkin’s indirect infringement of the ’537 Patent (induced
22 and contributory infringement), Plaintiff is entitled to monetary damages (present
23 and future) in an amount adequate to compensate for Belkin’s infringement, but in
24 no event less than a reasonable royalty for the use made of the invention by Belkin’s
25 customers, together with interest and costs as fixed by the Court.

26 **PRAYER FOR RELIEF**

27 WHEREFORE, Plaintiff respectfully requests that this Court enter:

28 a. A judgment in favor of Plaintiff that Belkin has infringed, either

RUSS, AUGUST & KABAT

- 1 literally and/or under the doctrine of equivalents, the '652, '392, and '537 Patents;
- 2 b. A judgment and order requiring Belkin to pay Plaintiff its damages
- 3 (past, present, and future), costs, expenses, and pre-judgment and post-judgment
- 4 interest for Belkin's infringement of the '652, '392, and '537 Patents;
- 5 c. A judgment and order requiring Belkin to pay Plaintiff compulsory
- 6 ongoing licensing fees, as determined by the Court in equity.
- 7 d. A judgment and order requiring Belkin to provide an accounting and to
- 8 pay supplemental damages to Plaintiff, including without limitation, pre-judgment
- 9 and post-judgment interest and compensation for infringing products released after
- 10 the filing of this case that are not colorably different from the accused products;
- 11 e. A judgment and order finding that this is an exceptional case within the
- 12 meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees
- 13 against Belkin; and
- 14 f. Any and all other relief as the Court may deem appropriate and just
- 15 under the circumstances.

DEMAND FOR JURY TRIAL

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

19
20 DATED: January 10, 2021

Respectfully submitted,

21 /s/ Reza Mirzaie

22 Reza Mirzaie (CA SBN 246953)
 23 rmirzaie@raklaw.com
 24 Brett E. Cooper (admitted *pro hac vice*)
 25 bcooper@raklaw.com
 26 Marc A. Fenster (CA SBN 181067)
 27 mfenster@raklaw.com
 28 Seth Hasenour (admitted *pro hac vice*)
shasenour@raklaw.com
 Drew B. Hollander (admitted *pro hac vice*)
dhollander@raklaw.com
 Christian W. Conkle (CA SBN 306374)
cconkle@raklaw.com
 RUSS AUGUST & KABAT

12424 Wilshire Blvd. 12th Floor
Los Angeles, CA 90025
Phone: (310) 826-7474
Facsimile: (310) 826-6991

*Attorneys for Plaintiff Scramoge
Technology Limited*

RUSS, AUGUST & KABAT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was electronically filed with the CM/ECF system per LR 5(a), and that all interested parties are being served with a true and correct copy of these documents via the CM/ECF system.

DATED: January 10, 2022

/s/ Reza Mirzaie
Reza Mirzaie

RUSS, AUGUST & KABAT