

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

10 Attorneys for Plaintiff  
*Scramoge Technology Limited*

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

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

Case No. 8:21-cv-01673-DOC-ADS  
**AMENDED COMPLAINT FOR  
 PATENT INFRINGEMENT**  
**JURY TRIAL DEMANDED**

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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 Defendants Mophie Inc. (“Defendant” or “Mophie”):

5 **INTRODUCTION**

6 1. This amended complaint arises from Mophie’s unlawful infringement  
7 of 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 Mophie Inc. is a corporation  
19 organized under the laws of California, with its principal place of business at 15495  
20 Sand Canyon, 4th Floor, Irvine, California 92618.

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 Mophie in this action because  
26 Mophie has committed acts within this District giving rise to this action and has  
27 established minimum contacts with this forum such that the exercise of jurisdiction  
28 over Mophie would not offend traditional notions of fair play and substantial justice.

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

5 6. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).  
6 Defendant Mophie Inc. is registered to do business in California. Additionally, upon  
7 information and belief, Defendant has transacted business in this District and has  
8 committed acts of direct and indirect infringement in this District by, among other  
9 things, making, using, offering to sell, selling, and importing products that infringe  
10 the Asserted Patents. Mophie has a regular and established place of business in this  
11 District, including at 15495 Sand Canyon, 4th Floor, Irvine, California 92618.

12 **COUNT I**

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

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

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

22 9. On information and belief, Mophie makes, uses, offers for sale, sells,  
23 and/or imports certain products, including without limitation the Mophie-branded  
24 Powerstation Wireless, Powerstation Wireless XL, Powerstation Plus XL,  
25 Powerstation All-in-One, Powerstation Hub, Charge Stream Powerstation Wireless,  
26 Charge Force Powerstation, Powerstation Wireless Stand, Powerstation Plus XL  
27 Wireless with PD, Powerstation Wireless XL with PD (fabric), and Powerstation Go  
28 (“Accused Products”), that directly infringe, literally and/or under the doctrine of

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1 equivalents, one or more claims of the '652 Patent. Identification of the accused  
2 products will be provided in Plaintiff's infringement contentions pursuant to the  
3 Court's scheduling order.

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

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

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

15 **COUNT II**

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

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

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

25 15. On information and belief, Mophie makes, uses, offers for sale, sells,  
26 and/or imports certain products, including without limitation the Mophie-branded  
27 Wireless Charging Base, Charge Force, Charge Force Desktop Dock, Charge Force  
28 Wireless Charging Base, Wireless Charging Base, Powerstation Wireless,

1 Powerstation Wireless XL, Powerstation Plus XL, PowerStation All-in-One,  
2 Powerstation Hub, Charge Stream Powerstation Wireless, Charge Force  
3 Powerstation, Wireless Charging Hub, Wireless Charging Stand+, Snap+ Wireless  
4 Stand, Snap+ Juice Pack Mini, Snap+ Wireless Vent Mount, Snap+ Wireless, 3-in-  
5 1 Wireless Stand (for MagSafe, 7.5W, and 15W), 4-in-1 Wireless Charging Mat, 3-  
6 in-1 Wireless Charging Pad, 2-in-1 Wireless Charging Stand, Wireless Charging Pad  
7 (7.5W and 15W), Wireless Charging Pad Mini, Charge Stream Pad, Charge Stream  
8 Pad+, Charge Stream Pad Mini, Charge Stream Desk Stand, Dual Wireless Charging  
9 Base, All-in-One Wireless Charging Pad, Wireless Charging Pad (fabric), Dual  
10 Wireless Charging Pad (fabric), Dual Wireless Charging Pad, Wireless Charging  
11 Stand (7.5W and 15W), UV Sanitizer with Wireless Charging, Charge Stream Vent  
12 Mount, Juice Pack, Juice Pack Connect, Juice Pack Connect Mini, Juice Pack  
13 Access, Juice Pack Air, Powerstation Go, Powerstation Wireless Stand,  
14 Powerstation Wireless XL with PD, and Powerstation Wireless XL with PD (fabric)  
15 (“Accused Products”), that directly infringe, literally and/or under the doctrine of  
16 equivalents, one or more claims of the ’392 Patent in violation of 35 U.S.C. § 271(a).  
17 Identification of the accused products will be provided in Plaintiff’s infringement  
18 contentions pursuant to the Court’s scheduling order.

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

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

25 18. As a result of Mophie’s infringement of the ’392 Patent, Plaintiff is  
26 entitled to monetary damages (past, present, and future) in an amount adequate to  
27 compensate for Mophie’s infringement, but in no event less than a reasonable royalty  
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1 for the use made of the invention by Mophiee, together with interest and costs as  
2 fixed by the Court.

3 **COUNT III**

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

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

7 20. Plaintiff owns by assignment all rights, title, and interest, including the  
8 right to recover damages for past, present, and future infringement, in U.S. Patent  
9 No. 7,825,537, entitled “Inductive power transfer system and method.” The ’537  
10 Patent was duly and legally issued by the United States Patent and Trademark Office  
11 on November 2, 2010. A true and correct copy of the ’537 Patent is attached as  
12 Exhibit 5.

13 21. On information and belief, Mophie makes, uses, offers for sale, sells,  
14 and/or imports certain products, including without limitation the Mophie-branded  
15 Wireless Charging Base, Charge Force, Charge Force Desktop Dock, Charge Force  
16 Wireless Charging Base, Wireless Charging Base, Powerstation Wireless,  
17 Powerstation Wireless XL, Powerstation Plus XL, PowerStation All-in-One,  
18 Powerstation Hub, Charge Stream Powerstation Wireless, Charge Force  
19 Powerstation, Wireless Charging Hub, Wireless Charging Stand+, Snap+ Wireless  
20 Stand, Snap+ Juice Pack Mini, Snap+ Wireless Vent Mount, Snap+ Wireless, 3-in-  
21 1 Wireless Stand (for MagSafe, 7.5W, and 15W), 4-in-1 Wireless Charging Mat, 3-  
22 in-1 Wireless Charging Pad, 2-in-1 Wireless Charging Stand, Wireless Charging Pad  
23 (7.5W and 15W), Wireless Charging Pad Mini, Charge Stream Pad, Charge Stream  
24 Pad+, Charge Stream Pad Mini, Charge Stream Desk Stand, Dual Wireless Charging  
25 Base, All-in-One Wireless Charging Pad, Wireless Charging Pad (fabric), Dual  
26 Wireless Charging Pad (fabric), Dual Wireless Charging Pad, Wireless Charging  
27 Stand (7.5W and 15W), UV Sanitizer with Wireless Charging, Charge Stream Vent  
28 Mount, Juice Pack, Juice Pack Connect, Juice Pack Connect Mini, Juice Pack

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1 Access, Juice Pack Air, Powerstation Go, Powerstation Wireless Stand,  
2 Powerstation Wireless XL with PD, and Powerstation Wireless XL with PD (fabric)  
3 (“Accused Products”), that directly infringe, literally and/or under the doctrine of  
4 equivalents, one or more claims of the ’537 Patent, including through Mophie’s own  
5 use and/or testing of the Accused Products. Identification of the accused products  
6 will be provided in Plaintiff’s infringement contentions pursuant to the Court’s  
7 scheduling order.

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

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

15 24. First, on October 12, 2021, Mophie was served with an original  
16 complaint alleging infringement of the ’537 Patent and the infringing nature of the  
17 Accused Products. *See* Dkt. No. 15 (Proof of Service).

18 25. Second, on information and belief, Mophie has knowledge of the ’537  
19 Patent through co-pending actions filed by Scramoge against its competitors (Belkin  
20 International, Inc. and Anker Innovations Ltd.) and business partners (such as Apple  
21 Inc.), which also allege infringement of the ’537 Patent by similar wireless chargers  
22 and charging power banks as those sold by Belkin. *See Scramoge Technology Ltd.*  
23 *v. Belkin International, Inc.*, No. 2:21-cv-08035-DOC-ADS (C.D. Cal. Oct. 7,  
24 2021); *Scramoge Technology Ltd. v. Anker Innovations Ltd., et al.*, No. 5:21-cv-  
25 01712-DOC-ADS (C.D. Cal. Oct. 8, 2021); *Scramoge Technology Ltd. v. Apple Inc.*,  
26 No. 6:21-cv-01071-ADA (W.D. Tex. Oct. 14, 2021). With respect to its competitors  
27 Belkin and Anker, it is plausible that Mophie tracks or is otherwise appraised of  
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1 patent litigations against other market players in the ordinary course of business and  
2 learned of the '537 Patent through the filing of those cases.

3 26. Third, it is also plausible that Mophie's business partners (such as  
4 Apple) would inform it (and provide notice, such as for indemnification) of potential  
5 liability for Mophie products advertised and sold on their website. *See, e.g.,*  
6 [https://www.apple.com/shop/product/HP642ZM/A/mophie-powerstation-plus-  
7 wireless-8k-  
8 pd?fnode=b875a5f5b3e70707790c4935e77957eb1cb67b4e404d42c78bcba47cd20  
9 17eecaa98a831457f478f9f1ee8f1f71ba56120691d3b286f091459cee6dfcce321ef7f  
10 c44362b7aca0eace18e5691b3710d47f69720201f9b45564036ec80ad19a734acb892  
11 af7f79fbf6c80ead52ef9a819313dff23d95870fd7b5db86808523eb8](https://www.apple.com/shop/product/HP642ZM/A/mophie-powerstation-plus-wireless-8k-pd?fnode=b875a5f5b3e70707790c4935e77957eb1cb67b4e404d42c78bcba47cd2017eecaa98a831457f478f9f1ee8f1f71ba56120691d3b286f091459cee6dfcce321ef7fc44362b7aca0eace18e5691b3710d47f69720201f9b45564036ec80ad19a734acb892af7f79fbf6c80ead52ef9a819313dff23d95870fd7b5db86808523eb8) (accused  
12 Mophie Powerstation Plus sold on Apple website).

13 27. Fourth, on January 4, 2022, Scramoge sent Mophie a letter outlining its  
14 infringement of, *inter alia*, the '537 Patent and demanding that Mophie cease its  
15 infringing activities (including but not limited to its inducement and contributory  
16 infringement of the '537 Patent) by January 7, 2022. Mophie acknowledged receipt  
17 of the letter on January 7, 2022. To date, however, Mophie has not ceased its  
18 infringing activities.

19 28. Despite this knowledge obtained as many as four different ways of  
20 the '537 Patent, Mophie continues to actively encourage and instruct its customers  
21 and end users (for example, through user manuals, online instruction materials, and  
22 videos on its website) to use the Accused Products in ways that directly infringe  
23 the '537 Patent in an infringing manner. For example, Mophie instructs users on  
24 how to use the exemplary Mophie Powerstation All-in-One to inductively charge a  
25 target unit, *i.e.*, smartphone, wearable, and/or other device, in a manner that infringes  
26 one or more claims of the '537 Patent:



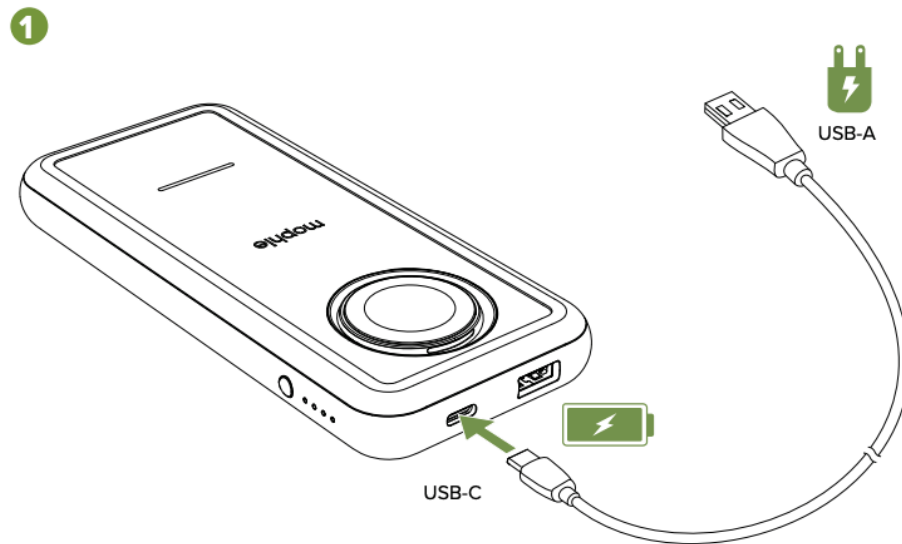
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**How do I wirelessly charge my Qi-enabled smartphone with the powerstation all-in-one?**

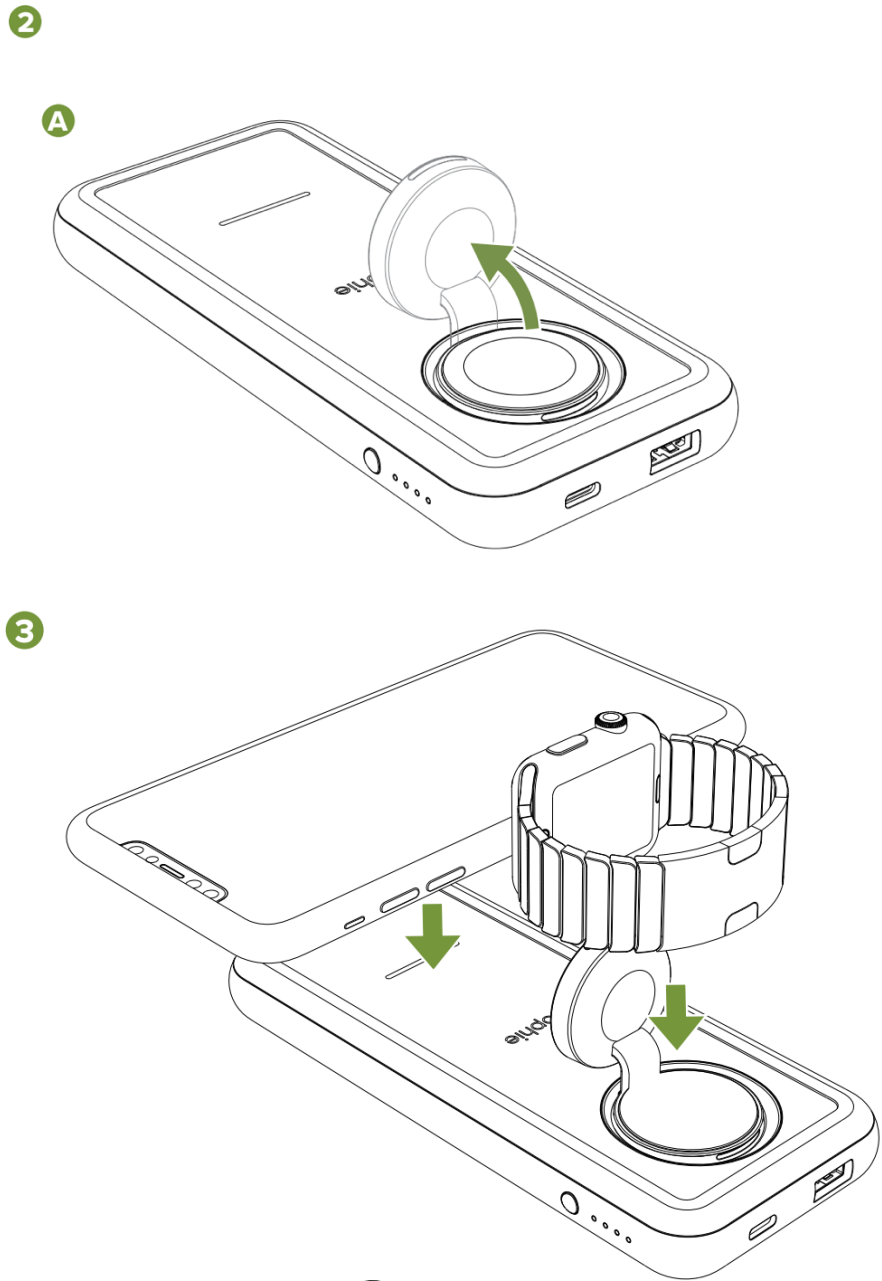
After fully charging the powerstation all-in-one portable battery, place your Qi-enabled smartphone on top of it. Make sure the center of the device is aligned over the mophie logo on top of the battery. Then press the battery's status button to activate wireless charging.

See [https://www.Mophie.com/en\\_us/powerstation-all-in-one](https://www.Mophie.com/en_us/powerstation-all-in-one). Mophie also provides user manuals on its website that include step-by-step instructions on how to use the exemplary Mophie Powerstation All-in-One to inductively transfer power to a target unit, *i.e.*, smartphone, wearable, and/or other device, in an infringing manner:



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See [https://www.Mophie.com/en\\_us/mwdownloads/download/link/id/1100/](https://www.Mophie.com/en_us/mwdownloads/download/link/id/1100/). Mophie provides similar instructions and user manuals on its website that depict how to use the Accused Products in an infringing manner. See, e.g., [https://www.Mophie.com/en\\_us/mwdownloads/download/link/id/1156/](https://www.Mophie.com/en_us/mwdownloads/download/link/id/1156/) (Mophie Snap+ Juice Pack Mini user manual); [https://www.Mophie.com/en\\_us/mwdownloads/download/link/id/1150/](https://www.Mophie.com/en_us/mwdownloads/download/link/id/1150/) (Mophie Wireless Charging Hub user manual);

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1 [https://www.Mophie.com/en\\_us/mwdownloads/download/link/id/1085/](https://www.Mophie.com/en_us/mwdownloads/download/link/id/1085/) (Mophie 4-  
2 in-1 Wireless Charging Mat user manual). Mophie provides these instructions, user  
3 manuals, videos, and other materials knowing and intending (or with willful  
4 blindness to the fact) that its customers and end users will commit these infringing  
5 acts. Mophie also continues to make, use, offer for sale, sell, and/or import the  
6 Accused Products, despite its knowledge of the '537 Patent, thereby specifically  
7 intending for and inducing its customers to infringe the '537 Patent through the  
8 customers' normal and customary use of the Accused Products.

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

19  mophie.

## 20 powerstation all-in-one

21 Contains a 8,000mAh internal battery with built-in Apple  
22 Watch charger.

23 for **Airpods Pro, AirPods, Apple Watch, iPhone**



## 25 Universal Wireless Charging

26 Wireless charging works on contact and can deliver a safe and efficient  
27 charge of up to 5W to your iPhone.

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1 See [https://www.zagg.com/en\\_us/powerstation-all-in-one](https://www.zagg.com/en_us/powerstation-all-in-one); see also, e.g.,  
2 [https://www.zagg.com/en\\_us/snap-plus-wireless-charging-stand](https://www.zagg.com/en_us/snap-plus-wireless-charging-stand) (Snap+ Wireless  
3 Stand) (“15W wireless charging stand compatible with snap and MagSafe for  
4 Smartphones, iPhone, Google Pixel, Samsung Galaxy, Qi-enabled Devices.”).  
5 Mophie’s wireless power chargers, power banks, and battery packs are base units  
6 that constitute a material part of the inventions claimed in the ’537 Patent, are  
7 especially made or adapted to infringe the ’573 Patent, and are not staple articles or  
8 commodities of commerce suitable for non-infringing use. For example, there are  
9 no non-infringing uses for the accused functionality in the Accused Products other  
10 than to inductively transfer power to a target unit in an infringing manner.

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

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

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

24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiff respectfully requests that this Court enter:

26 a. A judgment in favor of Plaintiff that Mophie has infringed, either  
27 literally and/or under the doctrine of equivalents, the ’652, ’392, and ’537 Patents;

28 b. A judgment and order requiring Mophie to pay Plaintiff its damages

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1 (past, present, and future), costs, expenses, and pre-judgment and post-judgment  
2 interest for Mophie’s infringement of the ’652, ’392, and ’537 Patents;

3 c. A judgment and order requiring Mophie to pay Plaintiff compulsory  
4 ongoing licensing fees, as determined by the Court in equity.

5 d. A judgment and order requiring Mophie to provide an accounting and  
6 to pay supplemental damages to Plaintiff, including without limitation, pre-judgment  
7 and post-judgment interest and compensation for infringing products released after  
8 the filing of this case that are not colorably different from the accused products;

9 e. A judgment and order finding that this is an exceptional case within the  
10 meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys’ fees  
11 against Mophie; and

12 f. Any and all other relief as the Court may deem appropriate and just  
13 under the circumstances.

14 **DEMAND FOR JURY TRIAL**

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

17  
18 DATED: January 10, 2021

Respectfully submitted,

19 /s/Reza Mirzaie

20 Reza Mirzaie (CA SBN 246953)  
21 [rmirzaie@raklaw.com](mailto:rmirzaie@raklaw.com)  
22 Brett E. Cooper (*pro hac vice* pending)  
23 [bcooper@raklaw.com](mailto:bcooper@raklaw.com)  
24 Marc A. Fenster (CA SBN 181067)  
25 [mfenster@raklaw.com](mailto:mfenster@raklaw.com)  
26 Seth Hasenour (*pro hac vice* pending)  
27 [shasenour@raklaw.com](mailto:shasenour@raklaw.com)  
28 Drew B. Hollander (*pro hac vice* pending)  
[dhollander@raklaw.com](mailto:dhollander@raklaw.com)  
Christian W. Conkle (CA SBN 306374)  
[cconkle@raklaw.com](mailto: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*

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**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

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