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Attorneys for Plaintiff
INNOMED Technologies, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

INNOMED TECHNOLOGIES, INC.

Plaintiff,

v.

UCLA HEALTH and AKIRA ISHIYAMA

Defendants.

CASE NO. 2:23-cv-5268

COMPLAINT FOR PATENT
INFRINGEMENT

JURY TRIAL DEMANDED

Plaintiff InnoMed Technologies complains of Defendants UCLA Health and Akira Ishiyama (“UCLA,” “Ishiyama” or “Defendants”) as follows:

I. NATURE OF LAWSUIT

1. This is a claim for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

II. THE PARTIES

2. Plaintiff InnoMed Technologies (“INNOMED”) is a corporation having a principal place of business located in Encino, California. INNOMED is the owner, by assignment, of U.S. Patent No. 11,083,789 (the '789 Patent) issued August 10, 2021, and entitled “IVIG Treatments for Bell’s Palsy” (copy attached as Exhibit A). INNOMED owns all rights, title, and interest in, and has standing to sue for infringement of the '789 Patent.

1 10. The inventors of the '789 Patent, Dr. John Joseph and Karen Doyle were the first to
2 identify and put into practice the use of IVIG to treat patients suffering from Bell's Palsy. Dr. John Joseph
3 and Karen Doyle have assigned their rights in the '789 Patent to INNOMED.

4 11. Prior to their invention as claimed in the '789 Patent, many treatments for Bell's Palsy
5 failed to reverse the debilitating conditions associated with the disease. To the extent that any of the
6 treatments used actually worked, the recovery time would be many months. What Ms. Doyle and Dr.
7 Joseph found was that by administering IVIG to a patient suffering from Bell's Palsy, the patients
8 uniformly recovered from the debilitating conditions associated with this disease in as little as two weeks.

9 12. Dr. John Joseph informed Defendant Ishiyama and Defendant UCLA about his invention
10 and asked Defendant Ishiyama to treat a patient suffering from Bell's Palsy to see how the invention
11 worked. To Dr. John Joseph's and Defendant Ishiyama's surprise, the invention comprising treating a
12 patient suffering from Bell's Palsy with IVIG worked better to resolve Bell's Palsy than currently used
13 treatments. In fact, the patient's Bell's Palsy resolved within about two weeks.

14 13. Defendants Ishiyama and UCLA recognizing the incredible value of Dr. John Joseph's
15 and Karen Doyle's invention to treat Bell's Palsy then used the treatment on at least nine other patients
16 that are known to Dr John Joseph and Karen Doyle. Based on information provided to Dr. John Joseph,
17 the recovery rate of these at least these other nine additional patients was one hundred percent (100%).
18 Additionally, the recovery times for these additional nine patients were all relatively short as compared
19 to current treatments, with several recovering in about two weeks.

20 14. Knowing that the inventive treatment of Dr. John Joseph and Karen Doyle worked better
21 than other commonly used treatments, Defendants Ishiyama and UCLA decided to proceed with using
22 the inventive treatment method using IVIG to treat patients suffering with Bell's Palsy without obtaining
23 the consent of either inventors, Dr. John Joseph or Karen Doyle. Instead, Defendants Ishiyama and
24 UCLA with full knowledge of the patents existence, have willfully infringed the '789 Patent to the great
25 detriment and loss of Dr. John Joseph and Karen Doyle.

26 15. Defendants Ishiyama and UCLA have been on notice of the '789 Patent and INNOMED's
27 claims of infringement by Defendants, and, for at least this reason, Defendants Ishiyama and UCLA
28 actions are believed to be willful and undertaken with the intent to infringe the '789 Patent.

16. Defendants Ishiyama and UCLA's direct infringement and inducement to infringe have been willful and have deliberately injured and will continue to injure INNOMED unless and until the Court enters an injunction prohibiting further infringement and, specifically, enjoining further use, sale and/or offer for sale of the patented method using IVIG to treat Bell's Palsy that fall within the scope of the '789 Patent claims.

VI. PRAYER FOR RELIEF

WHEREFORE, INNOMED asks this Court to enter judgment against Defendant and against its subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

A. An award of damages adequate to compensate INNOMED for the infringement that has occurred, together with prejudgment interest from the date infringement of the '789 Patent began;

B. Increased damages as permitted under 35 U.S.C. § 284;

C. A finding that this case is exceptional and an award to INNOMED of its attorneys' fees and costs as may be appropriate and as provided by 35 U.S.C. § 285;

D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the '789 Patent.

E. Pre-judgment interest calculated from the time of the first occurrence of any infringing activity through and until entry of judgment; and

F. Such other and further relief as this Court or a jury may deem proper and just.

VII. JURY DEMAND

INNOMED demands a trial by jury on all issues presented in this Complaint.

Dated: June 30, 2023

ENTRALTA P.C.

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