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15 POWERMAT TECHNOLOGIES LTD.

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**

19
20 POWERMAT TECHNOLOGIES LTD.,

21 Plaintiff,

22 vs.

23 BELKIN INTERNATIONAL, INC.,

24 Defendant.
25
26
27
28

Case No. 2:24-cv-2595

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

1 **COMPLAINT FOR PATENT INFRINGEMENT**

2 Plaintiff Powermat Technologies Ltd. (“Powermat”), by and through its
3 undersigned counsel, files this complaint under 35 U.S.C. § 271 against Defendant
4 Belkin International, Inc. (“Belkin” or “Defendant”), and alleges as follows, upon
5 actual knowledge with respect to itself and its own acts, and upon information and
6 belief as to all other matters.

7 **NATURE OF THE ACTION**

8 1. This is an action for patent infringement arising under the Patent Laws
9 of the United States, 35 U.S.C. § 1, *et seq.*

10 **THE PARTIES**

11 2. Plaintiff Powermat Technologies Ltd. is an Israeli limited liability
12 company with a principal place of business located at 94 Derech Shlomo Shmeltzer,
13 Bldg Brosh, Kiryat Arie, Petah Tivka 4970602, Israel.

14 3. Upon information and belief, Defendant Belkin International, Inc. is a
15 corporation organized and existing under the laws of Delaware with a principal place
16 of business located at 555 S Aviation Blvd., Suite 180, El Segundo, CA 90245-4852.

17 **JURISDICTION AND VENUE**

18 4. This Court has subject matter jurisdiction over the subject matter of this
19 action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because the action arises under the
20 patent laws of the United States, 35 U.S.C. § 271, *et seq.*

21 5. This Court has personal jurisdiction over Belkin because Belkin has a
22 principal place of business in California.

23 6. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)-(d) and
24 1400(b) because Belkin resides in this district, has its principal place of business in
25 this district, has conducted and continues to conduct business in this district, and has
26 committed and continues to commit acts of infringement in this district.

PATENTS-IN-SUIT

7. The Asserted Patents are U.S. Patent Nos. 7,906,936; 8,536,737; 8,558,410; 8,624,750; and 9,325,195.

8. U.S. Patent No. 7,906,936 (“the ’936 Patent,” attached hereto at Exhibit 1) duly issued on March 15, 2011 and is entitled, “Rechargeable Inductive Charger.” Powermat is the owner by assignment of the ’936 Patent and possesses all rights under the ’936 Patent, including the exclusive right to recover for past and future infringement.

9. U.S. Patent No. 8,536,737 (“the ’737 Patent,” attached hereto at Exhibit 2) duly issued on September 17, 2013 and is entitled, “System for Inductive Power Provision in Wet Environments.” Powermat is the owner by assignment of the ’737 Patent and possesses all rights under the ’737 Patent, including the exclusive right to recover for past and future infringement.

10. U.S. Patent No. 8,558,410 (“the ’410 Patent,” attached hereto at Exhibit 3) duly issued on October 15, 2013 and is entitled, “Energy Transfer Arrangement and Method.” Powermat is the owner by assignment of the ’410 Patent and possesses all rights under the ’410 Patent, including the exclusive right to recover for past and future infringement.

11. U.S. Patent No. 8,624,750 (“the ’750 Patent,” attached hereto at Exhibit 4) duly issued on January 7, 2014 and is entitled, “System and Method for Inductive Power Provision Over an Extended Surface.” Powermat is the owner by assignment of the ’750 Patent and possesses all rights under the ’750 Patent, including the exclusive right to recover for past and future infringement.

12. U.S. Patent No. 9,325,195 (“the ’195 Patent,” attached hereto at Exhibit 5) duly issued on April 26, 2016 and is entitled, “Inductively Chargeable Power Pack.” Powermat is the owner by assignment of the ’195 Patent and possesses all rights under the ’195 Patent, including the exclusive right to recover for past and future infringement.

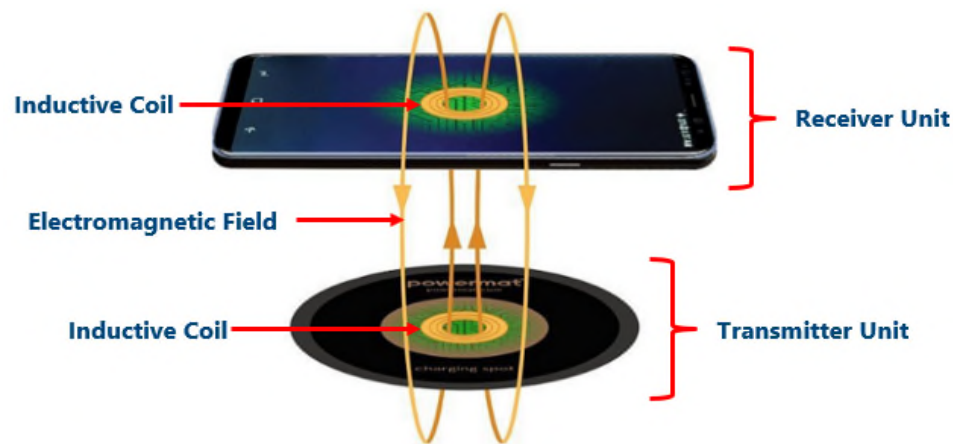
BACKGROUND

Powermat's History

13. Powermat was founded in 2006 in Neve Ilan, Israel, with the mission of enabling a 100% wireless future, in which devices and machines enjoy seamless, unlimited access to wireless power.

14. Powermat offers a suite of wireless power solutions, which have been incorporated into products and services across the globe, spanning a multitude of industries and sectors, including automotive, robotics, defense, consumer electronics, healthcare, and telecommunications.

15. A core aspect of Powermat's wireless charging technology is inductive charging—a type of wireless power transfer that uses induction coils to create an alternating electromagnetic field, thereby transferring energy from a transmitter unit (*e.g.*, a wireless charging station) to a receiver unit (*e.g.*, a smartphone). The receiver unit then converts the energy into power that can charge a battery (*e.g.*, the battery within the smartphone).



16. Powermat was one of the first companies to enter the domain of magnetics induction, reflected today in Powermat's significant brand recognition and technology leadership, and in the quality and breadth of its patent portfolio.

17. In its early years (2006-2011), Powermat focused on introducing wireless power to consumers and building out its ecosystem of power transmitters

1 and receivers. During this period, Powermat formed a number of strategic
2 partnerships to commercialize its products, including with companies such as
3 Homedics, T-Mobile, and General Motors. Products developed over this period
4 included wireless charging platforms, mats, and other surfaces, as well as cases and
5 backdoors for smartphones and gaming devices.

6 18. In 2012, Powermat partnered with Duracell to expand its retail presence
7 in the United States and the United Kingdom. That same year, Powermat partnered
8 with Starbucks in what started as a ten-store pilot in Boston, and later turned into a
9 12,000-plus charging spot installation across five U.S. cities—New York, San
10 Francisco, Los Angeles, Chicago, and Boston. Powermat's charging networks were
11 installed by a number of significant brands, including McDonald's, Coffee Bean &
12 Tea Leaf, Madison Square Garden, and Westfield.

13 19. As a recognized leader and pioneer in wireless charging, Powermat
14 collaborated with Procter & Gamble, Starbucks, and AT&T in 2012 to form the
15 Power Matters Alliance (PMA), a non-profit industry organization whose mission
16 was to advance a suite of standards and protocols for wireless power transfer for
17 mobile electronic devices. Around that same time, Powermat specifications were
18 added as a requirement for certain mobile devices sold by AT&T, including
19 Samsung, LG, ASUS, and Kyocera.

20 20. Today, Powermat's technology can be found in millions of products,
21 including mobile devices, electronic accessories, and automobiles. Recognizing its
22 significant role in the wireless charging space, Powermat also developed a broad and
23 extensive patent portfolio.

24 **Powermat's Patent Portfolio**

25 21. Powermat's patent portfolio includes well over 150 patents, with dozens
26 more pending, directed to various aspects of wireless charging. These patents cover
27 both power transmitters (*e.g.*, the functionality incorporated into a wireless charging
28 pad) and power receivers (*e.g.*, the functionality incorporated into products to allow

1 wireless charging, including such products as mobile phones, wireless earbuds,
2 watches, and more).

3 22. Many patents in Powermat's portfolio predate the major wireless
4 charging standards, including Qi (pronounced "chee")—the most widely adopted
5 wireless charging standard—and the Power Matters Alliance (PMA) standard. Many
6 of the most popular consumer electronics goods are compatible with Qi.

7 23. Powermat has an established licensing program for its standard essential
8 patents ("SEPs") but has also worked to license its valuable non-SEPs, which have
9 also been accepted by the industry. None of the patent claims asserted in this
10 complaint are Necessary Claims under the WPC's IPR policy.¹ As such, none of the
11 claims asserted herein are subject to the WPC's RAND obligations.

12 **The Parties' Prior License Agreement**

13 24. Belkin is familiar with the scope, breadth, and value of Powermat's
14 patent portfolio.

15 25. In 2015, around the time it began selling wireless chargers, Belkin
16 approached Powermat about licensing its patent portfolio.

17 26. On November 3, 2015, the parties entered into a patent license
18 agreement ("Agreement") whereby Powermat agreed to license certain of its patents
19

20 ¹ The Qi Standard is developed and maintained by the Wireless Power Consortium
21 (WPC). Similar to many standard setting organizations (SSOs), the WPC has an
22 intellectual property rights (IPR) policy requiring that its members make certain
23 intellectual property available for license on reasonable and non-discriminatory
24 (RAND) terms. The IPR policy requires its members to license its "Necessary
25 Claims" (*i.e.*, claims of a patent that would be necessarily infringed by
26 implementation of the standard) for RAND terms with respect to power transmitters
27 and power receivers that are fully compliant with an Approved Wireless Power
28 Specification. WPC (IPR) Policy, Article I Patent Licensing, Section 1.1 at 2, Section
1.3 at 4 (available at
[https://www.wirelesspowerconsortium.com/media/jwgnuf5/20200624-wpc-inc-
ipr-policy.pdf](https://www.wirelesspowerconsortium.com/media/jwgnuf5/20200624-wpc-inc-ipr-policy.pdf)).

1 to Belkin, and Belkin agreed to pay royalties on all sales of any Belkin products that
2 complied with certain wireless charging standards.

3 27. In 2017, Belkin sent Powermat a letter purportedly terminating the
4 Agreement, and ceased payment of all royalties to Powermat.

5 28. In 2019, Powermat filed a lawsuit against Belkin in the U.S. District
6 Court for the Southern District of New York, alleging, among other things, breach of
7 contract. *Powermat Technologies, Ltd. v. Belkin International, Inc.*, Case No. 1:19-
8 cv-878 (S.D.N.Y.), Dkt. 1.

9 29. At the heart of the dispute were the parties' disparate interpretations of
10 the categories of products for which Belkin was obligated to pay royalties. Powermat
11 contended that Belkin was obligated to pay royalties on all products that complied
12 with the PMA or Qi Standards. Belkin argued that the Agreement was limited only
13 to products comporting with the PMA Standard.

14 30. In September 2020, Powermat and Belkin settled the dispute.

15 31. Despite the parties' settlement and competing interpretations of the
16 Agreement, two things were clear: (1) Powermat's patent portfolio was valuable and
17 necessary for Belkin to compete in the wireless charging marketplace; and (2) Belkin,
18 at one time, willingly paid royalties to Powermat in recognition of this fact.

19 32. The parties agree that the Agreement is no longer operative.

20 **Belkin's Failure To Seek Another License**

21 33. Belkin has been aware of Powermat's wireless charging portfolio since
22 at least 2015.

23 34. Belkin is aware that Powermat's portfolio consists both of patents that
24 are essential to practicing the Qi standard, and those that are not essential to
25 practicing the Qi standard.

26 35. Belkin already has licensed and paid royalties on certain Powermat
27 patents that are not essential to practicing the Qi standard.
28

1 36. Belkin unilaterally terminated the Agreement granting that license, and
2 is no longer paying royalties on any Powermat patents despite continuing to sell
3 products in the United States and in this District that Belkin knows infringe one or
4 more of Powermat's non-SEPs.

5 37. Since at least 2017, Belkin has been operating and continues to operate
6 without a license to any of Powermat's patents.

7 38. Belkin has made no attempt to license any Powermat patents, following
8 its unilateral termination of the Agreement in 2017.

9 39. Powermat is left with no choice but to bring the instant action to protect
10 and enforce its intellectual property rights and the substantial investments made
11 therein.

12 **COUNT 1 – INFRINGEMENT OF U.S. PATENT NO. 7,906,936**

13 40. Powermat incorporates paragraphs 1-39 above by reference.

14 41. The '936 Patent is directed to a rechargeable power pack configured for
15 inductively charging an electronic device. For example, according to one
16 embodiment, the rechargeable power pack includes a charging circuit configured to
17 regulate charging thereof, an inductive coil concealed behind a platform, and a
18 driving circuit for providing a varying electrical potential across the inductive coil
19 such that the inductive coil is coupleable to a secondary coil placed over the platform
20 and wired to an electrical load.

21 42. Defendant has directly infringed one or more claims of the '936 Patent
22 in this district and elsewhere in California, including at least claims 1, 3, and 6-8
23 literally and/or under the doctrine of equivalents, by or through its sale, offer for sale,
24 manufacture, use, or import of its wireless charging products, including at least the
25 Belkin BoostCharge Magnetic Portable Wireless Charger 10K, BoostCharge
26 Magnetic Wireless Power Bank 2.5K, BoostCharge Magnetic Wireless Power Bank
27 5K + Stand, BoostCharge Pro Fast Wireless Charger for Apple Watch + Power Bank
28 10K, and any other Belkin products having materially similar functionality

(collectively, “the ’936 Accused Products”). Powermat reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the ’936 Accused Products are identified to describe the Defendant’s infringement and in no way limit the discovery and infringement allegations against Defendant concerning other devices that incorporate the same or reasonably similar functionalities.

43. Each of the ’936 Accused Products, including for example, the Belkin BoostCharge Magnetic Portable Wireless Charger 10K (“BoostCharge 10K”), includes or acts as a rechargeable inductive charger.



BoostCharge
Magnetic Portable Wireless Charger 10K

SKU: BPD001bBK ★★★★★ 4.5 (67)

Designed for iPhone 15/14/13/12 series, this MagSafe compatible wireless charging pad doubles as a 10K portable power bank to take with you on-the-go. Get the best of both charging worlds with a dual-function charging pad and power bank.

Charge Wirelessly at Home or On-The-Go

Designed for the iPhone 15/14/13/12 series, this MagSafe compatible wireless charging pad doubles as a 10K power bank to take with you anywhere. Perfect magnetic alignment every time allows you to keep using your phone while it charges without detaching it from the pad, and a slim, portable design fits easily in your purse or pocket. When the pad needs a recharge, pass-through power allows you to plug it in while still powering 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.

<https://www.belkin.com/magnetic-portable-wireless-charger-10k/P-BPD001.html>.

44. Additionally, each of the ’936 Accused Products, including for example, the Belkin 10K, includes at least one chargeable power pack. For example, Belkin markets the BoostCharge 10K as a “MagSafe compatible wireless charging pad” that “doubles as a 10K portable power bank to take with you on-the-go.” *Id.* Belkin further

describes the BoostCharge 10K as “a dual-function charging pad and power bank.”

Id.

45. Additionally, each of the '936 Accused Products, including for example, the BoostCharge 10K, includes at least one charging circuit configured to regulate charging of the power pack. For example, the BoostCharge 10K is capable of being “fully recharge[d],” and therefore, on information and belief, has a charging circuit for regulating such charging.

Fast Charge

18W USB-C port to fast charge your compatible device** and fully recharge the power bank in less than 3.5 hours.†

Id.

46. Each of the '936 Accused Products, including for example, the BoostCharge 10K, further includes at least one inductive coil concealed behind a platform. For example, the BoostCharge 10K, like the rest of the '936 Accused Products, is configured for wireless inductive charging and is marketed as Mag-Safe-compliant. *Id.* Based on the foregoing and on information and belief, each of the '936 Accused Products includes at least one inductive coil concealed behind a platform (*e.g.*, the BoostCharge 10K's charging surface).

47. Additionally, each of the '936 Accused products, including for example, the BoostCharge 10K, includes at least one driving circuit connectable to the power pack and operable to provide a varying electrical potential across the inductive coil such that the inductive coil is inductively coupleable to a secondary coil placed over the platform and wired to an electric load. For example, on information and belief, each of the '936 Accused Products, including for example, the BoostCharge 10K, is configured to inductively charge the battery of an electronic device equipped with a secondary coil (*e.g.*, a Mag-Safe-compliant smartphone) placed on its surface or

1 platform. On information and belief, each of the '936 Accused Products includes
2 circuitry for driving an oscillating voltage across the its primary inductive coil for
3 inducing a current in the secondary coil of the electronic device.

4 48. The foregoing features and capabilities of the '936 Accused Products,
5 and Belkin's description and/or demonstration thereof, including on its website and
6 in user manuals, support articles, and advertising, reflect Belkin's direct infringement
7 by satisfying every element of at least claims 1, 3, and 6-8 of the '936 Patent, under
8 35 U.S.C. § 271(a).

9 49. Defendant undertook and continues its infringing actions despite an
10 objectively high likelihood that such activities infringe the '936 Patent, which has
11 been duly issued by the USPTO, and is presumed valid. For example, since at least
12 the filing of this complaint, and likely since entering into the 2015 Agreement,
13 Defendant has been aware of an objectively high likelihood that its actions
14 constituted and continue to constitute infringement of the '936 Patent, and that
15 the '936 Patent is valid. On information and belief, Defendant could not reasonably,
16 subjectively believe that its actions do not constitute infringement of the '936 Patent,
17 nor could it reasonably, subjectively believe that the patent is invalid. Despite that
18 knowledge and subjective belief, and the objectively high likelihood that its actions
19 constitute infringement, Defendant has continued its infringing activities. As such,
20 Defendant willfully infringes the '936 Patent.

21 50. Powermat has been damaged by Defendant's infringement of the '936
22 Patent.

23 **COUNT 2 – INFRINGEMENT OF U.S. PATENT NO. 8,536,737**

24 51. Powermat incorporates paragraphs 1-50 above by reference.

25 52. The '737 Patent is directed to an inductive power receiver for coupling
26 with a primary inductor and providing power to an electric load. The receiver may
27 be incorporated into a power adaptor that includes a female power jack socket
28 electrically connected to a secondary inductor within the power receiver. The female

1 power jack socket may be configured to form a conductive coupling with a male-
2 pinned power plug connector.

3 53. Defendant has directly infringed one or more claims of the '737 Patent
4 in this district and elsewhere in California, including at least claims 1, 2, 4, and 5
5 literally and/or under the doctrine of equivalents, by or through its sale, offer for sale,
6 manufacture, use, or import of its wireless charging receiver products, including at
7 least the SoundForm Flow Noise Cancelling Earbuds, SoundForm Pulse Wireless
8 Earbuds, SoundForm Rise Wireless Earbuds, SoundForm Immerse Wireless
9 Earbuds, SoundForm Motion Wireless Earbuds, SoundForm Freedom Wireless
10 Earbuds, SoundForm Move Plus Wireless Earbuds, and any other Belkin products
11 having materially similar functionality (collectively, "the '737 Accused Products").
12 Powermat reserves the right to discover and pursue any additional infringing devices
13 that incorporate infringing functionalities. For the avoidance of doubt, the '737
14 Accused Products are identified to describe the Defendant's infringement and in no
15 way limit the discovery and infringement allegations against Defendant concerning
16 other devices that incorporate the same or reasonably similar functionalities.

17 54. Each of the '737 Accused Products, including for example, the Belkin
18 SoundForm Flow Noise Cancelling Earbuds ("SoundForm Flow"), includes a power
19 receiver, *e.g.*, a wireless charging case, for inductively coupling with a primary
20 inductor, *e.g.*, in a wireless charger.



Go With the Flow

Phone calls connected through dual beamforming technology feel like an in-person conversation, and the convenient Hear-Thru mode helps you stay alert to your surroundings for safety or to speak to people around you. Up to 7 hours of battery life per charge and another 24 hours of power in the wireless charging case offer true all-day listening pleasure. With IPX5-rated sweat- and water-resistant materials to keep up with weather and workouts, and easy connection via Bluetooth® 5.2, SOUNDFORM Flow is the perfect choice for no-noise, premium audio that lasts all day.

<https://www.belkin.com/noise-cancelling-earbuds/P-AUC006.html>.

55. Each of the '737 Accused Products, including, for example, the SoundForm Flow, includes a secondary inductor configured to inductively couple with a primary inductor and provide power to an electric load. For example, the SoundForm Flow includes a wireless charging case, that may be charged on a wireless charging pad. *Id.* Therefore, on information and belief, the wireless charging case in the SoundForm Flow includes at least one secondary inductor for inductively coupling with a primary inductor (*e.g.*, within a wireless charger), and for providing power to an electric load (*e.g.*, the earbuds within the wireless charging case).

56. Each of the '737 Accused Products, including, for example, the SoundForm Flow, is incorporated into a power adaptor further including a female power-jack socket electrically connected to the secondary inductor. For example, the SoundForm Flow is equipped with USB-C charging via a female-shaped USB-C port on the wireless charging case for engaging with a male-shaped end of a USB-C charging cable. On information and belief, the USB-C port is electrically connected to the secondary inductor in the wireless charging case.

Fast Recharging

Get 60 minutes of playtime with just 10 minutes of USB-C charging. The full charge with 31 hours of playtime takes only 2 hours.

<https://www.belkin.com/noise-cancelling-earbuds/P-AUC006.html>.

1 57. The foregoing features and capabilities of the '737 Accused Products,
2 and Defendant's description and/or demonstration thereof, including on its website
3 and in user manuals, support articles, and advertising, reflect Defendant's direct
4 infringement by satisfying every element of at least claims 1, 2, 4, and 5 of the '737
5 Patent, under 35 U.S.C. § 271(a).

6 58. Defendant undertook and continues its infringing actions despite an
7 objectively high likelihood that such activities infringe the '737 Patent, which has
8 been duly issued by the USPTO, and is presumed valid. For example, since at least
9 the filing of this complaint, and likely since entering into the 2015 Agreement,
10 Defendant has been aware of an objectively high likelihood that its actions
11 constituted and continue to constitute infringement of the '737 Patent, and that
12 the '737 Patent is valid. On information and belief, Defendant could not reasonably,
13 subjectively believe that its actions do not constitute infringement of the '737 Patent,
14 nor could it reasonably, subjectively believe that the patent is invalid. Despite that
15 knowledge and subjective belief, and the objectively high likelihood that its actions
16 constitute infringement, Defendant has continued its infringing activities. As such,
17 Defendant willfully infringes the '737 Patent.

18 59. Powermat has been damaged by Defendant's infringement of the '737
19 Patent.

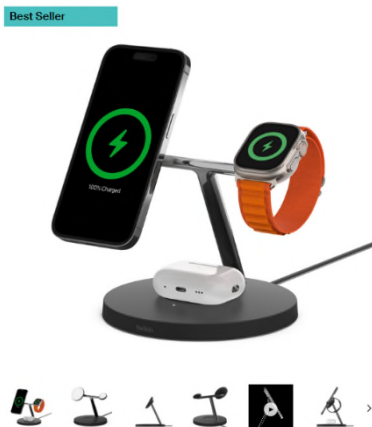
20 **COUNT 3 – INFRINGEMENT OF U.S. PATENT NO. 8,558,410**

21 60. Powermat incorporates paragraphs 1-59 above by reference.

22 61. The '410 Patent is generally directed to an energy transfer apparatus.
23 For example, the '410 Patent discloses a configuration including a first energy
24 surface and a first means configured for transferring energy from the first energy
25 surface to a terminal device, such as a mobile phone. The configuration may further
26 include a second energy surface and a second means configured to transfer energy
27 from the second energy surface to the first energy surface. The first and second means
28 may include inductive coils for transferring energy to another surface.

62. Defendant has directly infringed one or more claims of the '410 Patent in this district and elsewhere in California, including at least claims 1, 3, 5, and 7 literally and/or under the doctrine of equivalents, by or through its sale, offer for sale, manufacture, use, or import of its wireless charging products, including at least the Belkin BoostCharge Pro 3-in-1 Wireless Charger with Official MagSafe Charging 15W, the Belkin BoostCharge Pro Convertible Magnetic Wireless Charging Stand with Qi2 15W, the Belkin BoostCharge Pro 2-in-1 Wireless Charging Dock with MagSafe 15W, the Belkin BoostCharge Pro 3-in-1 Wireless Charger with MagSafe 15W, the Belkin BoostUp Wireless Charging Dock for iPhone + Apple Watch + USB-A port, the Belkin BoostCharge 3-in-1 Wireless Charger for Apple Devices, and the Belkin Auto-Tracking Stand Pro with DockKit, and any other product having materially similar functionality (collectively, "the '410 Accused Products"). Powermat reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the '410 Accused Products are identified to describe the Defendant's infringement and in no way limit the discovery and infringement allegations against Defendant concerning other devices that incorporate the same or reasonably similar functionalities.

63. Each of the '410 Accused Products, including for example, the Belkin BoostCharge Pro 3-in-1 Wireless Charger with Official MagSafe Charging 15W ("Belkin 3-in-1 Stand"), is or includes an energy transfer arrangement, including surfaces and means for inductively charging smartphones, smart watches, and/or wireless earbuds.



1 [https://www.belkin.com/3-in-1-wireless-charger-with-official-magsafe-charging-](https://www.belkin.com/3-in-1-wireless-charger-with-official-magsafe-charging-15w/P-WIZ017.html)
2 [15w/P-WIZ017.html](https://www.belkin.com/3-in-1-wireless-charger-with-official-magsafe-charging-15w/P-WIZ017.html).

3 64. Each of the '410 Accused Products, including for example, the Belkin
4 3-in-1 Stand, has a first energy surface, for placing and inductively charging, for
5 example, a smartphone. *Id.* Likewise, each of the '410 Accused Products, including
6 for example, the Belkin 3-in-1 Stand, further includes a first means configured to
7 transfer energy from the first energy surface to a terminal device, for example, a
8 smartphone. *Id.*

9 65. Additionally, each of the '410 Accused Products, including for example,
10 the Belkin 3-in-1 Stand, includes a second energy surface, for example, the base of
11 the Belkin 3-in-1 Stand, which includes a surface for inductively charging, for
12 example, wireless earbuds, and serves as a conduit for transmitting power to the first
13 energy surface. *Id.*

14 66. Further, each of the '410 Accused Products, including for example, the
15 Belkin 3-in-1 Stand, includes a second means configured to transfer energy from the
16 second energy surface to the first energy surface. For example, per above, on
17 information and belief, the base of the Belkin 3-in-1 Stand includes one or more
18 conductors for transferring power to the first energy surface. *Id.*

19 67. The foregoing features and capabilities of the '410 Accused Products,
20 and Defendant's description and/or demonstration thereof, including on its website
21 and in user manuals, support articles, and advertising, reflect Defendant's direct
22 infringement by satisfying every element of at least claims 1, 3, 5, and 7 of the '410
23 Patent, under 35 U.S.C. § 271(a).

24 68. Defendant undertook and continues its infringing actions despite an
25 objectively high likelihood that such activities infringe the '410 Patent, which has
26 been duly issued by the USPTO, and is presumed valid. For example, since at least
27 the filing of this complaint, and likely since entering into the 2015 Agreement,
28 Defendant has been aware of an objectively high likelihood that its actions

1 constituted and continue to constitute infringement of the '410 Patent, and that
2 the '410 Patent is valid. On information and belief, Defendant could not reasonably,
3 subjectively believe that its actions do not constitute infringement of the '410 Patent,
4 nor could it reasonably, subjectively believe that the patent is invalid. Despite that
5 knowledge and subjective belief, and the objectively high likelihood that its actions
6 constitute infringement, Defendant has continued its infringing activities. As such,
7 Defendant willfully infringes the '410 Patent.

8 69. Powermat has been damaged by Defendant's infringement of the '410
9 Patent.

10 **COUNT 4 – INFRINGEMENT OF U.S. PATENT NO. 8,624,750**

11 70. Powermat incorporates paragraphs 1-69 above by reference.

12 71. The '750 Patent is directed to an inductive power outlet for transmitting
13 power over an extended surface. For example, the '750 Patent discloses a method of
14 transferring power from an inductive power outlet to a movable inductive power
15 receiver adjacent to an extended surface. The method may include providing at least
16 one primary inductor behind the extended surface, locating the inductive power
17 receiver, and providing an oscillating voltage supply to at least one primary inductor
18 coupled to a secondary inductor integral to the inductive power receiver. The
19 inductive power outlet may be adjustable.

20 72. Defendant has directly infringed one or more claims of the '750 Patent
21 in this district and elsewhere in California, including at least claims 1, 11-13, 30, and
22 31 literally and/or under the doctrine of equivalents, by or through its sale, offer for
23 sale, manufacture, use, or import of its wireless charging products, including at least
24 the Belkin BoostCharge 15W Wireless Charging Stand + QC 3.0 24W Wall Charger,
25 BoostCharge 3-in-1 Wireless Charger for Apple Devices, BoostCharge 3-in-1
26 Wireless Charger Special Edition for Apple Devices, BoostCharge Pro 2-in-1
27 Magnetic Wireless Charging Pad with Qi2 15W, BoostCharge Pro 2-in-1 Wireless
28 Charging Dock with MagSafe 15W, BoostCharge Pro 2-in-1 Wireless Charging Pad

1 with Official MagSafe Charging 15W, BoostCharge Pro 3-in-1 Magnetic Wireless
2 Charging Pad with Qi2 15W, BoostCharge Pro 3-in-1 Wireless Charger with
3 MagSafe 15W, BoostCharge Pro 3-in-1 Wireless Charger with Official MagSafe
4 Charging 15W, BoostCharge Pro 3-in-1 Wireless Charging Pad with Official
5 MagSafe Charging 15W, BoostCharge TrueFreedom PRO Wireless Charger,
6 BoostCharge Dual Wireless Charging Pads, BoostUp Wireless Charging Dock for
7 iPhone + Apple Watch + USB-A port, BoostUp Wireless Charging Spot
8 (Recessed/Hidden Installation) 4-Pack, PowerHouse 2-in-1 iPhone & Apple Watch
9 Charging Dock, and any other Belkin products having materially similar
10 functionality (collectively, “the ’750 Accused Products”). Powermat reserves the
11 right to discover and pursue any additional infringing devices that incorporate
12 infringing functionalities. For the avoidance of doubt, the ’750 Accused Products are
13 identified to describe the Defendant’s infringement and in no way limit the discovery
14 and infringement allegations against Defendant concerning other devices that
15 incorporate the same or reasonably similar functionalities.

16 73. Each of the ’750 Accused Products, including for example, the Belkin
17 BoostUp Wireless Charging Spot (Recessed/Hidden Installation) (“Belkin
18 BoostUp”) performs a method for transferring power from an inductive power outlet
19 to a movable inductive power receiver (*e.g.*, a mobile phone) adjacent to an extended
20 surface, such as a desk or table.



1 **QI™ WIRELESS CHARGING ANYWHERE**

2 The BOOST ↑ UP Wireless Charging Spot for recessed/hidden installation brings convenient,
3 fast and cable-free charging into public environments. Universally-compatible, Qi-certified
4 charging pads are easily integrated into any location to provide an enhanced customer
5 experience. This four-pack can be powered from a single AC outlet and configured for flexible
6 positioning. Qi-certification ensures compatibility with wireless-charging-enabled iPhones,
7 Samsung devices, Sony, LG and many other Qi-enabled devices.

8 [https://www.belkin.com/wireless-charging-spot-recessedhidden-](https://www.belkin.com/wireless-charging-spot-recessedhidden-installation-%E2%80%934-pack/P-B2B184.html)
9 [installation-%E2%80%934-pack/P-B2B184.html.](https://www.belkin.com/wireless-charging-spot-recessedhidden-installation-%E2%80%934-pack/P-B2B184.html)

10 74. Each of the '750 Accused Products, including for example, the Belkin
11 BoostUp, provides at least one primary inductor behind the extended surface (*e.g.*, a
12 desk or table). Further, each of the '750 Accused Products, including for example,
13 the Belkin BoostUp, locates an inductive power receiver, *e.g.*, via communication
14 with the receiver, visual indication, or magnetic alignment. Additionally, each of
15 the '750 Accused Products, including for example, the Belkin BoostUp, is configured
16 to provide an oscillating voltage supply to at least one primary inductor coupled to a
17 secondary inductor integral to said inductive power receiver. *Id.*

18 75. Additionally, each of the '750 Accused Products, including for example,
19 the Belkin 3-in-1 Stand, is or includes a power providing system configured to
20 transfer power from an adjustable inductive power outlet to a moveable inductive
21 power receiver. Further, each of the '750 Accused Products, including for example,
22 the Belkin 3-in-1 Stand, is or includes a power outlet including at least one primary
23 inductor located behind an extended surface, where the outlet is capable of
24 inductively coupling with a power receiver containing a secondary inductor (*e.g.*, a
25 smartphone configured for wireless charging).

26 76. Each of the '750 Accused Products, including for example, the Belkin
27 3-in-1 Stand, further includes a targeting apparatus configured to couple at least one
28 local primary inductor to a secondary inductor of a power receiver (*e.g.*, a smartphone
with wireless charging capability) placed adjacent to the extended surface.

77. The foregoing features and capabilities of the '750 Accused Products,
and Belkin's description and/or demonstration thereof, including on its website and

1 in user manuals, support articles, and advertising, reflect Belkin's direct infringement
2 by satisfying every element of at least claims 1, 11-13, 30, and 31 of the '750 Patent,
3 under 35 U.S.C. § 271(a).

4 78. Defendant has indirectly infringed at least claims 1, 11-13, 30, and 31
5 of the '750 Patent in this district and elsewhere in the United States by, among other
6 things, actively inducing the use, offering for sale, selling, or importation of at least
7 the '750 Accused Products. Defendant's customers who purchase devices and
8 components thereof and operate such devices and components in accordance with
9 Defendant's instructions directly infringe one or more claims of the '750 Patent in
10 violation of 35 U.S.C. § 271. Defendant instructs its customers through at least user
11 manuals, support articles, and installation instructions available on its website. *See*,
12 *e.g.*, [https://www.belkin.com/wireless-charging-spot-recessedhidden-](https://www.belkin.com/wireless-charging-spot-recessedhidden-installation-%E2%80%934-pack/P-B2B184.html)

13 [installation-%E2%80%934-pack/P-B2B184.html](https://www.belkin.com/wireless-charging-spot-recessedhidden-installation-%E2%80%934-pack/P-B2B184.html) and
14 <https://www.belkin.com/support-article/?articleNum=293936>. Defendant is
15 therefore liable for infringement of the '750 Patent pursuant to 35 U.S.C. § 271(b).

16 79. Defendant has indirectly infringed at least claims 1, 11-13, 30, and 31
17 of the '750 Patent by, among other things, contributing to the direct infringement of
18 others, including customers of the '750 Accused Products by making, offering to sell,
19 or selling, in the United States, or importing a component of a patented process,
20 constituting a material part of the invention, knowing the same to be especially made
21 or especially adapted for use in infringement of the '750 Patent, and not a staple
22 article or commodity of commerce suitable for substantial non-infringing use. *Id.*

23 80. For example, the '750 Accused Products include at least one component
24 to inductively transmit power to an inductive power receiver, and to drive a voltage
25 to enable the power receiver to draw power therefrom. This is a component of a
26 patented machine, manufacture, or combination, or an apparatus for use in practicing
27 a patented process. Furthermore, such component is a material part of the invention
28 and upon information and belief is not a staple article or commodity of commerce

1 suitable for substantial non-infringing use. Thus, Defendant is liable for infringement
2 of the '750 Patent pursuant to 35 U.S.C. § 271(c).

3 81. Defendant has been on notice of the '750 Patent since at least the filing
4 of this complaint, and likely since entering into the 2015 Agreement. By the time of
5 trial, Defendant will thus have known and intended (since receiving such notice), that
6 its continued actions would actively induce and contribute to actual infringement of
7 at least claims 1, 11-13, 30, and 31 of the '750 Patent.

8 82. Defendant undertook and continues its infringing actions despite an
9 objectively high likelihood that such activities infringe the '750 Patent, which has
10 been duly issued by the USPTO, and is presumed valid. For example, since at least
11 the filing of this complaint, and likely since entering into the 2015 Agreement,
12 Defendant has been aware of an objectively high likelihood that its actions
13 constituted and continue to constitute infringement of the '750 Patent, and that
14 the '750 Patent is valid. On information and belief, Defendant could not reasonably,
15 subjectively believe that its actions do not constitute infringement of the '750 Patent,
16 nor could it reasonably, subjectively believe that the patent is invalid. Despite that
17 knowledge and subjective belief, and the objectively high likelihood that its actions
18 constitute infringement, Defendant has continued its infringing activities. As such,
19 Defendant willfully infringes the '750 Patent.

20 83. Powermat has been damaged by Defendant's infringement of the '750
21 Patent.

22 **COUNT 5 – INFRINGEMENT OF U.S. PATENT NO. 9,325,195**

23 84. Powermat incorporates paragraphs 1-83 above by reference.

24 85. The '195 Patent is generally directed to a system for providing power to
25 a power pack. The system may include a secondary inductor configured to couple
26 inductively with a primary inductor, an application-specific integrated circuit
27 operable to control transfer of power to the power pack, and a charger selection unit
28 configured to operate in wired and inductive charging modes while preventing

1 double-charging. The system may also include a data contact connected by way of
2 an electronic switch to an electronic element configured to indicate that the power
3 pack is being inductively charged, and at least one current limiter for reducing large
4 currents.

5 86. Defendant has directly infringed one or more claims of the '195 Patent
6 in this district and elsewhere in California, including at least claims 1-4, 6, 8-11, 13,
7 15, 17, 19, and 20 literally and/or under the doctrine of equivalents, by or through its
8 sale, offer for sale, manufacture, use, or import of its wireless charging products,
9 including at least the SoundForm Flow Noise Cancelling Earbuds, SoundForm Pulse
10 Wireless Earbuds, SoundForm Rise Wireless Earbuds, SoundForm Immerse
11 Wireless Earbuds, SoundForm Motion Wireless Earbuds, SoundForm Freedom
12 Wireless Earbuds, SoundForm Move Plus Wireless Earbuds, and any other Belkin
13 products having materially similar functionality (collectively, "the '195 Accused
14 Products"). Powermat reserves the right to discover and pursue any additional
15 infringing devices that incorporate infringing functionalities. For the avoidance of
16 doubt, the '195 Accused Products are identified to describe the Defendant's
17 infringement and in no way limit the discovery and infringement allegations against
18 Defendant concerning other devices that incorporate the same or reasonably similar
19 functionalities.

20 Each of the '195 Accused Products, including for example, the SoundForm
21 Flow, is or includes a charging system for providing power to a power pack. For
22 example, each of the '195 Accused Products is a charging case that contains a power
23 pack including at least an internal battery that can provide power to an earbud for
24 many hours of playtime. *See, e.g.,* <https://www.belkin.com/noise-cancelling-earbuds/P-AUC006.html>.
25

26 87. Each of the '195 Accused Products, including for example, the
27 SoundForm Flow, is or includes at least one secondary inductor configured to couple
28 inductively with a primary inductor. For example, each of the '195 Accused Products

1 is capable of charging its battery wirelessly via a secondary inductor (within the
2 charging case) that is configured to couple inductively with a primary inductor, *e.g.*,
3 within a Belkin wireless charger. *Id.*

4 88. Each of the '195 Accused Products, including for example, the
5 SoundForm Flow, includes at least one application-specific integrated circuit
6 operable to control transfer of power to the power pack. For example, on information
7 and belief, each of the '195 Accused Products, including the Sound Form Flow,
8 includes circuitry configured and operable to control transfer of the power to the
9 power pack (*e.g.*, as indicated by status lights indicating charging level as monitored
10 by an application-specific integrated circuit included therein). *Id.*

11 89. Additionally, each of the '195 Accused Products, including for example,
12 the SoundForm Flow, includes a charger selection unit operable to prevent double
13 charging, and further operable for functioning between wired and inductive charging
14 modes. For example, the SoundForm Flow charging case can be charged either
15 wirelessly or through a USB-C charging port (connected to a wired charger), and
16 includes circuitry operable to prevent double charging where the circuitry can operate
17 between wired and inductive charging modes. *Id.* Specifically, when the SoundForm
18 Flow charging case is wirelessly charging, and the USB-C wired charging cord is
19 inserted into the USB-C port, the charging case is configured to switch from a
20 wireless charging mode to a wired charging mode. *Id.*

21 90. Additionally, each of the '195 Accused Products, including for example,
22 the SoundForm Flow, includes at least one data contact connected via at least one
23 electronic switch to an electronic element, where the electronic element is configured
24 to indicate that the power pack is being inductively charged. For example, on
25 information and belief, the SoundForm Flow is configured to provide a
26 communication channel between the power pack and the host device to transfer
27 information, such as charge level or temperature during charging.

28

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment for itself and against Defendant as follows:

- a) An adjudication that Defendant has infringed U.S. Patent Nos. 7,906,936; 8,536,737; 8,558,410; 8,624,750; and 9,325,195;
- b) An award of damages to be paid by Defendant adequate to compensate Plaintiff for Defendant's past infringement of the Asserted Patents, and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- c) A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Plaintiff's reasonable attorneys' fees; and
- d) An award to Plaintiff of such further relief at law or in equity as the Court deems just and proper.

Dated: March 29, 2024

MAYER BROWN LLP
KFIR B. LEVY
JAMIE B. BEABER
WILLIAM J. BARROW
DOUGLAS A. SMITH

By: /s/ Kfir B. Levy
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