IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

NUCURRENT, INC., Plaintiff, v. ONEPLUS TECHNOLOGY (SHENZHEN) CO., LTD., Defendant	Case No. 6:24-cv-437 COMPLAINT FOR PATENT INFRINGEMENT AND JURY TRIAL DEMANDED

COMPLAINT

This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code, against Defendant OnePlus Technology (Shenzhen) Co., Ltd. ("OnePlus" or "Defendant") that relates to eight U.S. patents owned by Plaintiff NuCurrent, Inc. ("NuCurrent" or "Plaintiff"): 8,610,530; (the "'530 Patent"); 8,692,641 (the "'641Patent"); 8,698,590 (the "'590 Patent"); 8,823,481 (the "'481 Patent"); 8,823,482 (the "'482 Patent"); 11,336,003 (the "'003 Patent"); 11,476,566 (the "'566 Patent"); and 11,916,400 (the "'400 Patent") (collectively, the "Patents-in-Suit").

THE PARTIES

1. Plaintiff NuCurrent, Inc. is a Delaware corporation with a principal place of business at 641 W. Lake St., Suite 304, Chicago, Illinois, 60661.

2. Defendant OnePlus is a corporation duly organized and existing under the laws of China, with its principal place of business at 18F, Tairan Building, Block C, Tairan 8th Road, Chegongmiao, Futian District Shenzhen, Guangdong, 518040, China. On information and belief, OnePlus can be served with process at that address.

3. OnePlus has made, made, makes, used, uses, imports, imported, sold, sells, offers to sell, and offered to sell accessories for mobile devices, including products that are capable of wirelessly charging a mobile device's battery.

4. OnePlus has made, makes, used, uses, imports, imported, sold, sells, offers to sell, and offered to sell mobile devices such as smartphones that that are capable of wirelessly charging another mobile device's battery via "reverse wireless charging" functionality.

5. OnePlus has made, made, makes, used, uses, imports, imported, sold, sells, offers to sell and offered to sell mobile devices such as smartphones that contain batteries capable of being wirelessly charged.

JURISDICTION AND VENUE

6. This Complaint states causes of action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 1 *et seq.,* and, more particularly 35 U.S.C. § 271.

7. This Court has subject matter jurisdiction of this action under 28 U.S.C. §§ 1331 and 1338(a) in which the district courts have original and exclusive jurisdiction of any civil action for patent infringement.

8. OnePlus is subject to this Court's general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, Tex. Civ. Prac. & Rem. Code § 17.042, due at least to its substantial business conducted in this District, including: its place of business (national repair center) at 3918 Range Rd Ste B, Temple, Texas 76504. In addition, OnePlus has solicited business in the State of Texas, transacted business within the State of Texas and attempted to derive financial benefit from residents of the State of Texas in this District, including benefits directly related to the instant patent infringement causes of action set forth herein; (ii) having placed its products and services into the stream of commerce throughout the United States and

having been actively engaged in transacting business in Texas and in this District, and (iii) having committed the complained of tortious acts in Texas and in this District.

9. OnePlus, directly and/or through subsidiaries and agents (including distributors, retailers, and others), makes, imports, ships, distributes, offers for sale, sells, uses, and advertises (including offering products and services through its website, https://store.OnePlus.com/us/, as well as other retailers) its products and/or services in the United States, the State of Texas, and the Western District of Texas.

10. OnePlus, directly and/or through its subsidiaries and agents (including distributors, retailers, and others), has purposefully and voluntarily placed one or more of its infringing products and/or services, as described below, into the stream of commerce with the expectation that they will be purchased and used by consumers in the Western District of Texas. These infringing products and/or services have been and continue to be purchased and used by consumers in the Western District of Texas. OnePlus has committed acts of patent infringement within the State of Texas and, more particularly, within the Western District of Texas.

11. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 1400(b). Defendant is subject to personal jurisdiction in this District, has transacted business in this District, and has committed acts of patent infringement in this District.

12. Venue is also proper as to Defendant because 28 U.S.C. § 1391(c)(3) provides that "a defendant not resident in the United States may be sued in any judicial district, and the joinder of such a defendant shall be disregarded in determining where the action may be brought with respect to other defendants."

NUCURRENT, INC. AND THE PATENTS-IN-SUIT

13. NuCurrent is the owner of record and assignee of each of the Patents-in-Suit.

14. NuCurrent has the exclusive right to sue and the exclusive right to recover damages for infringement of the Patents-in-Suit during all relevant time periods.

15. Since 2009, NuCurrent has been a pioneer in the field of wireless charging technologies and has received numerous awards in recognition of its technologies. NuCurrent's technologies include its Multi-Layer Multi-Turn ("MLMT") structures that provide increased wireless charging efficiency and durability.

16. On December 17, 2013, the '530 Patent entitled "Multi-layer-multi-turn structure for tunable high efficiency inductors" was duly and legally issued by the USPTO. The '530 Patent (at 1:8-22) states: "The present application is a continuation-in-part of U.S. application Ser. No. 13/233,569, filed Sep. 15, 2011, which is a continuation-in-part of U.S. application Ser. No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No. PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference. The present application is a continuation-in-part of U.S. application Ser. No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No. PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference."

17. On April 8, 2014, the '641 Patent, entitled "Multi-layer-multi-turn high efficiency inductors with cavity structures," was duly and legally issued by the USPTO. The '641 Patent (at 1:8-32) states: "The present application is a continuation-in-part of U.S. application Ser. No. 13/233,569, filed Sep. 15, 2011, which is a continuation-in-part of U.S. application Ser. No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No.

PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference. The present application is a continuation-in-part of U.S. application Ser. No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No. PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference."

18. On April 15, 2014, the '590 Patent entitled "Method for operation of multi-layer-multi-turn high efficiency inductors with cavity structure," was duly and legally issued by the USPTO. The '590 Patent (at 1:9-24) states: The present application is a continuation-in-part of U.S. application Ser. No. 13/233,569, filed Sep. 15, 2011, which is a continuation-in-part of U.S. application Ser. No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No. PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference. The present application is a continuation-in-part of U.S. application Ser. No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No. PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference."

19. On September 2, 2024, the '481 Patent entitled "Multi-layer-multi-turn high efficiency inductors for electrical circuits," was duly and legally issued by the USPTO. The '481 Patent (at 1:8-22) states: "The present application is a continuation-in-part of U.S. application Ser. No. 13/233,569, filed Sep. 15, 2011, which is a continuation-in-part of U.S. application Ser.

No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No. PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference. The present application is a continuation-in-part of U.S. application Ser. No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No. PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference."

20. On September 2, 2014, the '482 Patent entitled "Systems using multi-layer-multi-turn high efficiency inductors," was duly and legally issued by the USPTO. The '482 Patent (at 1:8-22) states: "The present application is a continuation-in-part of U.S. application Ser. No. 13/233,569, filed Sep. 15, 2011, which is a continuation-in-part of U.S. application Ser. No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No. PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference. The present application is a continuation-in-part of U.S. application Ser. No. 13/255,659, filed Sep. 9, 2011, which is a 371 application of International Application No. PCT/US2010/000714, filed Mar. 9, 2010, which is a nonprovisional of U.S. Provisional Application No. 61/158,688, filed Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference."

21. On May 17, 2022, the '003 Patent, entitled "Multi-layer, multi-turn inductor structure for wireless transfer of power," was duly and legally issued by the USPTO. The '003 Patent (at 1:7-32) states: "This application is a continuation of, and claims priority to, U.S. Non-

Provisional application Ser. No. 15/227,192, filed on Aug. 3, 2016, and entitled "A MULTI-LAYER-MULTI-TURN STRUCTURE FOR HIGH EFFICIENCY WIRELESS COMMUNICATION," which in turn is a continuation-in-part of, and claims priority to, U.S. Non-Provisional application Ser. No. 14/059,100, filed on Oct. 21, 2013, issued as U.S. Pat. No. 9,444,213, and entitled "METHOD FOR MANUFACTURE OF MULTI-LAYER WIRE STRUCTURE FOR HIGH EFFICIENCY WIRELESS COMMUNICATION," which in turn is a continuation-in-part of, and claims priority to, U.S. Non-Provisional application Ser. No. 13/233,686, filed on Sep. 15, 2011, issued as U.S. Pat. No. 8,567,048, and entitled "METHOD OF MANUFACTURE OF MULTI-LAYER WIRE STRUCTURE," which in turn is a continuation-in-part of, and claims priority to, U.S. Non-Provisional application Ser. No. 13/255,659, filed on Sep. 9, 2011 and having a § 371(c) date of Nov. 22, 2011, issued as U.S. Pat. No. 8,855,786, and entitled "System and Method for Wireless Power Transfer in Implantable Medical Devices," which in turn is a national stage entry of International Application No. PCT/US2010/000714, filed on Mar. 9, 2010, which in turn claims priority to U.S. Provisional Application No. 61/158,688, filed on Mar. 9, 2009, each of which is herein incorporated by reference in its entirety."

22. On October 18, 2022, the '566 Patent, entitled "Multi-layer-multi-turn structure for high efficiency wireless communication," was duly and legally issued by the USPTO. The '566 Patent (at 1:7-19) states: "This application is a continuation in part of U.S. application Ser. No. 14/059,100, filed on Oct. 21, 2013, now U.S. Pat. No. 9,444,213, which is a continuation in part of U.S. Application Ser. No. 13/233,686, filed on Sep. 15, 2011, now U.S. Pat. No. 8,567,048, which is a continuation in part of U.S. application Ser. No. 13/255,659, filed on Sep. 9, 2011 and having a 371(c) date of Nov. 22, 2011, now U.S. Pat. No. 8,855,786, which is a 371

national stage entry of International Application No. PCT/US2010/000714 filed on Mar. 9, 2010, which claims priority to U.S. Provisional Application No. 61/158,688, filed on Mar. 9, 2009, the disclosures of which are entirely incorporated herein by reference."

23. On February 27, 2024, the '400 Patent, entitled "Multi-layer-multi-turn structure for high efficiency wireless communication," was duly and legally issued by the USPTO. The '400 Patent states (at 1:7-32): "This application is a continuation of, and claims priority to, U.S. Non-Provisional application Ser. No. 15/227,192, filed on Aug. 3, 2016, and entitled "A MULTI-LAYER-MULTI-TURN STRUCTURE FOR HIGH EFFICIENCY WIRELESS COMMUNICATION," which in turn is a continuation-in-part of, and claims priority to, U.S. Non-Provisional application Ser. No. 14/059,100, filed on Oct. 21, 2013, issued as U.S. Pat. No. 9,444,213, and entitled "METHOD FOR MANUFACTURE OF MULTI-LAYER WIRE STRUCTURE FOR HIGH EFFICIENCY WIRELESS COMMUNICATION," which in turn is a continuation-in-part of, and claims priority to, U.S. Non-Provisional application Ser. No. 13/233,686, filed on Sep. 15, 2011, issued as U.S. Pat. No. 8,567,048, and entitled "METHOD OF MANUFACTURE OF MULTI-LAYER WIRE STRUCTURE," which in turn is a continuation-in-part of, and claims priority to, U.S. Non-Provisional application Ser. No. 13/255,659, filed on Sep. 9, 2011 and having a § 371c) date of Nov. 22, 2011, issued as U.S. Pat. No. 8,855,786, and entitled "System and Method for Wireless Power Transfer in Implantable Medical Devices," which in turn is a national stage entry of International Application No. PCT/US2010/000714, filed on Mar. 9, 2010, which in turn claims priority to U.S. Provisional Application No. 61/158,688, filed on Mar. 9, 2009, each of which is herein incorporated by reference in its entirety."

DEFENDANT'S INFRINGING PRODUCTS

24. OnePlus has been, and now is, directly infringing claims of the Patents-in-Suit under 35 U.S.C. § 271(a) by performing the methods claimed in the Patents-in-Suit to operate at least the below accused devices (hereinafter "Accused OnePlus Devices") and by making, using, offering for sale, selling, and/or importing at least the below Accused OnePlus Devices that comprise the inductors, electrical circuits, systems, receiving antennas, transmitting antennas, and first antennas claimed in the Patents-in-Suit.

25. The Accused OnePlus Devices include devices that are listed on the Wireless Power Consortium ("WPC") product database as being compliant with the WPC's Qi wireless charging specification ("Qi Specification"). Qi-compliant devices include transmitting devices (a "PTx device") that wirelessly transmit power to a receiving device (a "PRx device"). PTx and PRx devices are "issued a certified ID number" (e.g., a "Qi-ID" number) by the WPC and listed on the WPC's Product Database if they "have been certified to meet the Qi standard for safety and operability . . . ."

26. The Accused OnePlus Devices include PTx devices, such as at least the product identified as OnePlus Warp Charge 50 Wireless Charger (also referred to as the OnePlus AIRVOOC 50W Wireless Charger by OnePlus) (OnePlus Part Number C302A and Qi-ID 11166). The image below shows the OnePlus AIRVOOC 50W Wireless Charger was certified on July 9, 2021 as a Qi 1.2.4 Specification-compliant PTx device and can deliver up to 15.0 W of power to a PRx device.

[QI-11166] ONEPLUS - OnePlus Warp Charge 50 Wireless Charger

QI-ID
QI-11166

LICENSED
YES

SPECIFICATION VERSION
1.2.4

BRAND
ONEPLUS

PRODUCT NAME
OnePlus Warp Charge 50 Wireless Charger

MANUFACTURER PART NUMBER
C302A

PRODUCT TYPE
PTx product

CERTIFICATION DATE
09 July 2021

Source: https://wirelesspowerconsortium.atlassian.net/servicedesk/customer/portal/12/article/28477434

27. The OnePlus AIRVOOC 50W Wireless Charger is sold and offered for sale on at least OnePlus's online website https://www.oneplus.com/us/product/oneplus-airvooc-50w-wireless-charger.

28. The Accused OnePlus Devices include PTx devices, such as at least the product identified as the OnePlus 12 smartphone (OnePlus Part Number PJD110 and/or CPH2573 and/or CPH2581 and/or CPH2583 and Qi-ID14746). The OnePlus 12 supports reverse wireless charging functionality, which allows the OnePlus 12 to act as a PTx device by "shar[ing] power from the OnePlus 12's . . . 5,400mAh battery pack with other devices." The OnePlus 12 can provide up to 10W of power to a PRx device via reverse wireless charging. (https://www.androidcentral.com/phones/does-the-oneplus-12-support-wireless-charging and https://www.digitaltrends.com/mobile/does-oneplus-12-have-wireless-charging/).

29. OnePlus's documentation explains that "[t]hrough Reverse wireless charging, you can use your phone to charge devices (such as phones, tablets, watches, and bands) that support wireless charging." (https://service.oneplus.com/content/dam/support/user-manuals/common/OxygenOS_14.0_User_Manual.pdf at pg. 177).

30. The Accused OnePlus Devices include PRx devices, including at least the device identified as the OnePlus 12 smartphone (OnePlus Part Number PJD110 and/or CPH2573 and/or CPH2581 and/or CPH2583 and Qi-ID14746). The below image shows that the OnePlus 12 smartphone was certified on December 7, 2023 as a Qi 1.3.3 Specification-compliant PRx device and can receive up to 11.0 W of power from a PTx device.

[QI-14746] ONEPLUS - 5G Digital Mobile Phone

QI-ID

QI-14746

LICENSED

YES

SPECIFICATION VERSION

1.3.3

BRAND

ONEPLUS

PRODUCT NAME

5G Digital Mobile Phone

MANUFACTURER PART NUMBER

PJD110, CPH2573, CPH2581, CPH2583

PRODUCT TYPE

PRx product

CERTIFICATION DATE

07 December 2023

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Additional Details:

PRODUCT CONTAINS SUBSYSTEM	No
MAXIMUM LOAD POWER	11.0

Source:
https://wirelesspowerconsortium.atlassian.net/servicedesk/customer/portal/12/article/30731049

31. As seen below, the box that the OnePlus 12 is sold in states that the OnePlus 12 has a Model/Part Number of CPH2583.

32. The OnePlus 12 smartphone is sold and offered for sale on at least OnePlus's online website (https://www.oneplus.com/us/oneplus-12?sku=5011105290).

33. The above identified Accused OnePlus Devices are non-limiting examples of infringement. NuCurrent reserves the right to specifically identify additional Accused OnePlus Devices.

COUNT I: PATENT INFRINGEMENT

34. NuCurrent reasserts and realleges all preceding paragraphs of this Complaint as though set forth fully here.

35. OnePlus infringes at least the following ninety-six claims ("Infringed Claims") of the Patents-in-Suit under 35 U.S.C. § 271(a):

U.S. Patent Number	Infringed Claims
8,610,530	1, 8, 9, 12, 15, 17, 19, 20, 25-27
8,692,641	1, 8, 9, 12, 21, 23-26, 31-33
8,698,590	1, 8, 9, 12, 15, 17-19, 24-26
8,823,481	1, 8, 9, 12, 15, 17-19, 24-26
8,823,482	1, 8, 9, 15, 18-20, 25-27
11,336,003	1-9, 12-18, 20, 21, 23, 24, 30
11,476,566	19, 22-24
11,916,400	1-16

36. Attached hereto as Exhibit 1 and incorporated into this complaint as alleged herein are claim charts setting forth, as non-limiting examples, where in each and every limitation of the Infringed Claims of the Patents-in-Suit found in the Accused OnePlus Devices.

37. The claims charts within Exhibit 1 are illustrative examples of OnePlus's infringement of the Infringed Claims of the Patents-in-Suit. NuCurrent reserves the right to identify additional infringed claims or infringing instrumentalities in accordance with the Court's local rules and applicable scheduling orders. NuCurrent further reserves the right to identify additional types of patent infringement committed by OnePlus.

38. OnePlus has made, makes, used, uses, imports, imported, sold, sells, offers to sell, and offered to sell the Accused Instrumentalities that meet each and every limitation of the Infringed Claims of the Patents-in-Suit.

39. As a direct and proximate result of OnePlus's acts of patent infringement, NuCurrent has been and continues to be injured, and has sustained and will continue to sustain damages.

JURY DEMAND

NuCurrent demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff NuCurrent requests that this Court enter judgment in its favor and against OnePlus as follows:

A. Adjudging, finding, and declaring that OnePlus has infringed of the above-identified claims of each of the Patents-in-Suit under 35 U.S.C. § 271;

B. Awarding the past and future damages arising out of OnePlus's infringement of the Patents-in-Suit to NuCurrent in an amount no less than a reasonable royalty, together with prejudgment and post-judgment interest, in an amount according to proof; and

C. Granting NuCurrent such other further relief as is just and proper, or as the Court deems appropriate.

Dated: August 26, 2024

Respectfully submitted,

By: */s/ Alison Aubry Richards*

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