

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

LONGI GREEN ENERGY TECHNOLOGY  
CO. LTD.

Plaintiff,

v.

JINKO SOLAR CO., LTD., JINKOSOLAR  
HOLDING CO., LTD., JINKOSOLAR  
(VIETNAM) INDUSTRIES CO. LTD., and  
JINKO SOLAR TECHNOLOGY SDN.  
BHD,

Defendants.

Civil Action No. 2:25-cv-00048

JURY TRIAL DEMANDED

**PLAINTIFF’S COMPLAINT FOR PATENT INFRINGEMENT**

LONGi Green Energy Technology Co. Ltd. (“LONGi Green” or “Plaintiff”) hereby files this Complaint against Defendants JinkoSolar Holding Co., Ltd.; Jinko Solar Co., Ltd.; JinkoSolar (Vietnam) Industries Co. Ltd., and Jinko Solar Technology Sdn. Bhd. (collectively, “Jinko” or “Defendants”) for infringement of U.S. Patent No. 9,515,214 (“the ’214 Patent”).

**THE PARTIES**

**LONGi Green**

1. Plaintiff LONGi Green is a company organized and existing under the laws of China, having a principal place of business at No. 8369 Shangyuan Road, Xi’an Economic and Technological Development Zone, Xi’an, Shaanxi, China. LONGi Green is the owner of the ’214 Patent.

2. LONGi Green is one of the leading manufacturers and suppliers of mono-crystalline silicon solar cells and modules in the world. In 2022, LONGi Green was selected as

one of “Forbes China Most Innovative Companies.” And in 2019, it was also included in MIT Technology Review’s “50 Smartest Companies.”

3. LONGi Green’s solar modules are supplied in the United States for use in residential, commercial, and industrial buildings, and also for solar utility projects and development.

### **JINKO**

4. Defendant JinkoSolar Holding Co., Ltd. (“JinkoSolar”) is a Cayman Islands corporation that has a registration office at Conyers Trust Company (Cayman) Limited, Cricket Square, Hutchins Drive, P.O. Box 2681, George Town, Grand Cayman, KY1-1111, Cayman Islands, and a principal place of business located at No. 1 Yingbin Road, Shangrao Economic Development Zone, Jiangxi Province, 334100, People’s Republic of China. JinkoSolar is traded on the New York Stock Exchange under the symbol “JKS.”

5. JinkoSolar claims to be one of the largest solar module manufacturers in the world. For example, in a recent press release, JinkoSolar stated that it “distributes its solar products and sells its solutions and services to a diversified international utility, commercial and residential customer base in China, the United States, ... and other countries and regions.” *See* <https://ir.jinkosolar.com/news-releases/news-release-details/jinkosolar-schedules-2024-annual-general-meeting-be-held>. JinkoSolar further stated that it “had over 10 productions facilities globally, over 20 overseas subsidiaries in ... Vietnam, ... the United States, ... Malaysia, ..., and a global sales network with sales teams in China, the United States, ... as of September 30, 2024.” *Id.*

6. On information and belief, JinkoSolar, directly or through its subsidiaries that act as its agents, makes, uses, sells, offers to sell, and imports infringing solar modules in and into the United States, Texas, and particularly, the Eastern District of Texas. JinkoSolar conducts

business in Texas and in the Eastern District of Texas, directly or through agents and intermediaries (including subsidiaries, distributors, affiliates, retailers, suppliers, integrators, and customers).

7. On information and belief, JinkoSolar was co-founded by Xiande Li, Xianhua Li, and Kangping Chen. Mr. Xiande Li is the Chairman and CEO of JinkoSolar.

8. Defendant Jinko Solar Co., Ltd. (“Jinko China”) is a Chinese corporation that is a majority-owned subsidiary of JinkoSolar, its controlling shareholder. Jinko China is controlled by JinkoSolar and shares the same principal place of business with JinkoSolar at No. 1, Yingbin Road, Shangrao Economic Development Zone, Jiangxi Province, 334100, People’s Republic of China. This same address is also identified as JinkoSolar’s “China Production Base Headquarters” (<https://www.jinkosolar.com/en/site/global>) and the “address of principal executive offices” of JinkoSolar in its SEC Form 20-F filing.

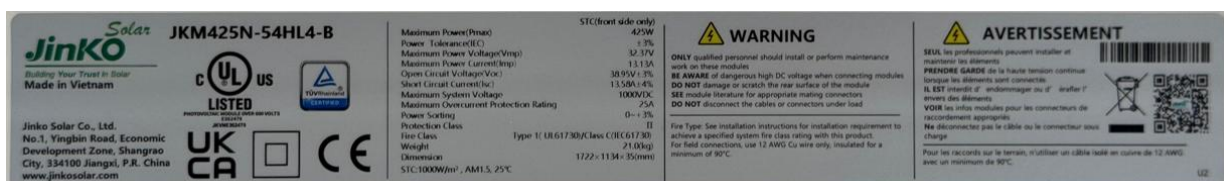
9. On information and belief, Jinko China also shares common directors or officers with JinkoSolar. On information and belief, Xiande Li is the Chairman of Jinko China and JinkoSolar. Haiyun (Charlie) Cao, who is a director of JinkoSolar, is the Vice President of Finance of Jinko China. Xianhua Li is also a director of both JinkoSolar and Jinko China. Kangping Chen, the co-founder of JinkoSolar, is also the President/CEO of Jinko China and former CEO of JinkoSolar.

10. Jinko China conducts all of the research and development of Jinko’s solar cells and modules in China. Jinko China also, directly or through subsidiaries that act as its agents, makes, uses, sells, offers to sell, and imports infringing solar modules in and into the United States, Texas, and particularly, the Eastern District of Texas. On information and belief, Jinko China conducts business in Texas and in the Eastern District of Texas, directly or through agents

and intermediaries (including subsidiaries, distributors, affiliates, retailers, suppliers, integrators, and customers). On information and belief, Jinko China, directly or through agents and intermediaries, also imports specially made solar cells into the United States for assembly into infringing solar modules in the United States.

11. Defendant JinkoSolar (Vietnam) Industries Co. Ltd. (“Jinko Vietnam”) is a Vietnamese corporation that has a place of business located at CN - XL - 06, 11, Song Khoai Industrial Zone, Song Khoai Ward, Quang Yen Town, Quang Ninh Province, Vietnam. Jinko Vietnam is a wholly-owned subsidiary of Jinko China and is controlled by Jinko China and JinkoSolar.

12. Jinko Vietnam is an agent of JinkoSolar and Jinko China and is referred to as “Jinko Solar Vietnam Manufacture Base.” <https://www.jinkosolar.com/en/site/global>. On information and belief, Jinko Vietnam makes solar modules in Vietnam for JinkoSolar and Jinko China, and together with or as their agent, exports these solar modules into the United States, and sells or otherwise supplies them for sale in the United States, including to residents of Texas, and particularly, the Eastern District of Texas, directly, through JinkoSolar (U.S.) Inc. (“Jinko US”), or through other intermediaries (including subsidiaries, distributors, affiliates, retailers, suppliers, integrators, and customers). For example, Jinko’s JKM425N-54HL4-B (one of the solar modules sold in the US and Texas and accused in this Complaint) states on its label: “Made in Vietnam” and identifies its supplier as Jinko China, stating: “Jinko Solar Co. Ltd. No. 1 Yingbin road, Economic Development Zone, Shangrao City, 334100 Jiangxi, P.R. China [www.jinkosolar.com](http://www.jinkosolar.com).”



13. On information and belief, Jinko Vietnam also makes solar cells in Vietnam, imports them into the United States, and sells or otherwise supplies them to JinkoSolar (U.S.) Industries Inc. (“Jinko Industries”) for assembly into solar modules on behalf of Jinko China or JinkoSolar for sale to residents of Texas and particularly the Eastern District of Texas, directly, through Jinko US, or through other intermediaries (including subsidiaries, distributors, affiliates, retailers, suppliers, integrators, and customers). For example, another Jinko solar module sold in the United States and in Texas and accused in this Complaint, JKM390M-72HBL-V, states on its label: “Modules assembled in the USA from solar cells made in Vietnam” and identifies its supplier as Jinko China, stating: “Jinko Solar Co., Ltd. No.1 Jinko Road Shangrao Economic Development Zone Jiangxi Province 334100 China.”

**Jinko Solar**  
**JinKO**  
 Building Your Trust in Solar

Jinko Solar Co., Ltd.  
 NO.1 Jinko Road Shangrao Economic Development Zone  
 Jiangxi Province 334100 China  
 www.jinkosolar.com

**PHOTOVOLTAIC MODULE**  
 Modules assembled in the USA from solar cells made in Vietnam

Solar Module Type : JKM390M-72H8L-V	
Maximum Power(P <sub>max</sub> )	390W
Power Measurement Tolerance	±3%
Maximum Power Voltage(V <sub>mp</sub> )	39.64V
Maximum Power Current(I <sub>mp</sub> )	9.84A
Open Circuit Voltage(V <sub>oc</sub> )	48.60V±3%
Short Circuit Current(I <sub>sc</sub> )	10.46A±4%
Maximum System Voltage	1500VDC
Maximum Series overcurrent protective device rating	20A
Operating Temperature	-40°C ~ +85°C
Protection Class	II
Module Fire Performance Type 1 (UL1703)/Class C (IEC61730)	
Weight	22.5(kg)
Dimension	2008×1002×40(mm)
STC:	1000W/m <sup>2</sup> , AM1.5, 25°C
Current Sorting	I1

**UL US LISTED**  
 PHOTOVOLTAIC MODULE OVER 600 VOLTS  
 E302K79  
 JKAB32479

**CE**

System fire Class Rating: See installation Instructions for Installation  
 Requirements to Achieve a Specified System Fire Class Rating with this Product  
 The fire rating is Class C in Canada

**WARNING**  
 ONLY qualified personnel should install or perform maintenance work on these modules  
**BE AWARE** of dangerous high DC voltage when connecting modules  
**DO NOT** damage or scratch the rear surface of the module  
**SEE** module literature for appropriate mating connectors

**AVERTISSEMENT**  
 SEUL les professionnels peuvent installer et maintenir les éléments  
**PRENDRE GARDE** de la haute tension continue lorsque les éléments sont connectés  
**IL EST** interdit d'endommager ou d'effrayer l'envers des éléments  
**VOIR** les infos modules pour les connecteurs de raccordement appropriés

For field connections, use 12 AWG wire insulated for a minimum of 90°C, rated for wet conditions and resistant to ultra violet radiation (where exposed)

E3

14. On information and belief, Jinko Solar Technology Sdn. Bhd. ("Jinko Malaysia") is a Malaysian corporation that has a registered address at 14A Jalan Tun Moh Fuad, Taman Tun Dr Ismail, Kuala Lumpur, Wilaya, Persekutuan, Malaysia, and a place of business located at 2481, Tingkat Perusahaan 4A, Kawasan Perusahaan Bebas Perai, Perai, Penang Pulau Pinang,

13600, Malaysia. Jinko Malaysia is a wholly-owned subsidiary of Jinko China and is controlled by Jinko China and JinkoSolar. Jinko Malaysia is an agent of JinkoSolar and Jinko China and is referred to as “Jinko Solar Malaysia Manufacture Base.”

<https://www.jinkosolar.com/en/site/global>. Jinko Malaysia makes solar modules in Malaysia for JinkoSolar and Jinko China and together with or as their agent, exports them into the United States, and sells or otherwise supplies them for sale in the United States, including to residents of Texas and particularly, the Eastern District of Texas, directly, through Jinko US, or through intermediaries (including subsidiaries, distributors, affiliates, retailers, suppliers, integrators, and customers). For example, on information and belief, Jinko Malaysia, directly or through Jinko US, imports JKM540M-72HL4-TV solar modules (one of the solar modules sold in the US and accused in this Complaint).

15. On information and belief, Jinko Industries is a Delaware corporation that operates a manufacturing facility at 4660 POW-MIA Memorial Parkway – STE. 200, Jacksonville, Florida 32221. Jinko Industries is a wholly-owned subsidiary of Jinko China and is controlled by Jinko China and JinkoSolar. Jinko Industries is an agent of JinkoSolar and Jinko China and is referred to as “Jinko Solar US Manufacture Base.”

<https://www.jinkosolar.com/en/site/global>. On information and belief, Jinko Industries shares common directors and officers with Jinko China and JinkoSolar. For example, Xiande Li, who is the Chairman of JinkoSolar, is also the Chairman of Jinko Industries. Kangping Chen, who is the President/CEO of Jinko China, is also the CEO of Jinko Industries. Before 2024, the former CFO of Jinko China, Zhihua Wang, was also a director of Jinko Industries.

16. On information and belief, Jinko Industries, as an agent of Jinko China and JinkoSolar, makes solar modules in the United States and sells and offers to sell solar modules in



the United States and in Texas. For example, Jinko Industries imports solar cells from Vietnam and assembles the imported solar cells into the JKM390M-72HBL-V solar modules in the United States for sale or supply to residents of Texas and particularly the Eastern District of Texas on behalf of Jinko China.

17. Jinko US is a Delaware corporation that has an address at 1901 S Bascom Ave., Suite 350, Campbell, CA 95008. Jinko US is a wholly-owned subsidiary of Jinko China and is directly controlled by Jinko China and JinkoSolar, as shown on JinkoSolar’s website.

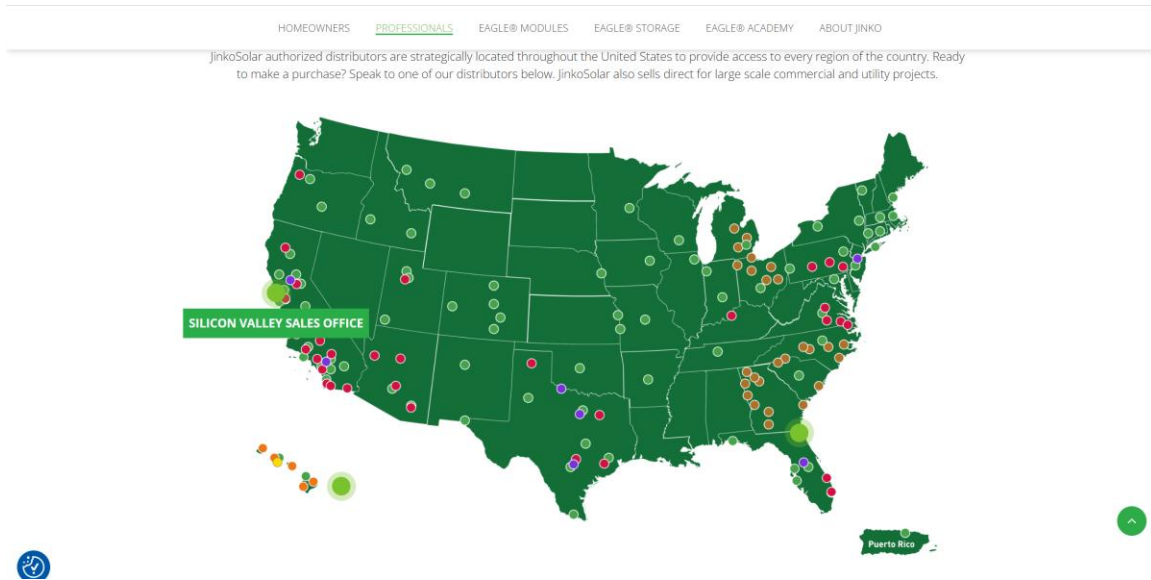
[https://jinkosolar.us/wp-content/uploads/2020/10/Jinko\\_General\\_Brochure\\_8.24.pdf](https://jinkosolar.us/wp-content/uploads/2020/10/Jinko_General_Brochure_8.24.pdf) (“Because we understand that our customers value local service, we’ve built a full-service team located in the heart of Silicon Valley.”). Jinko US is the sales agent for JinkoSolar and Jinko China in the United States, and the Jinko US’s office in California is listed as the main point of contact on JinkoSolar’s website for all inquiries relating to “US Sales and Operations.”

<https://jinkosolar.us/about-jinko/#team/>



The Jinko US’s office in California is also identified as JinkoSolar’s “Silicon Valley Sales Office” on its website. <https://jinkosolar.us/professionals/>





18. On information and belief, Jinko US shares common directors and officers with Jinko China and JinkoSolar. For example, Xiande Li, who is the Chairman of JinkoSolar, is also the CEO of Jinko US. Miao Gen is the current CFO of Jinko US and is also the Vice General Manager of Jinko China. Prior to Miao Gen, Zhihua Wang was the CFO of Jinko US and was at the same time the CFO of Jinko China. Given the close corporate relationship and common directors and officers between Jinko US, JinkoSolar, and Jinko China, it is reasonably certain that JinkoSolar and Jinko China have regular contacts with Jinko US in its capacity as their United States sales and operations base such that it is reasonably certain that JinkoSolar and Jinko China would be apprised of the service of this Complaint when it is served on Jinko US.

19. Jinko US is the seller and distributor for Jinko China and JinkoSolar's infringing solar modules products in the United States. Jinko US sells, offers to sell, and/or imports infringing solar modules, including those made by Jinko Malaysia, Jinko Vietnam, and Jinko Industries, in and into the United States and Texas on behalf of JinkoSolar and Jinko China. For example, on information and belief, Jinko US, as the United States seller and distributor on behalf of JinkoSolar and Jinko China, imports infringing solar modules, including JKM425N-

54HL4-B modules from Jinko Vietnam and JKM540M-72HL4-TV modules from Jinko Malaysia, into the United States for sale to distributors or residents in Texas and particularly the Eastern District of Texas. As the seller and distributor of JinkoSolar and Jinko China's infringing solar module products in the United States, Jinko US provides JinkoSolar and Jinko China with substantial business advantages through Jinko US's business decisions, which JinkoSolar and Jinko China enjoy as if they conducted their business through their own offices or paid agents in California, where Jinko US has an office.

20. On information and belief, Jinko US also has frequent contacts with Jinko Malaysia and Jinko Vietnam through at least the steady importation of infringing solar modules. As the importer and later distributor of infringing solar modules made by Jinko Malaysia and Jinko Vietnam, Jinko US provides Jinko Malaysia and Jinko Vietnam with substantial advantages through Jinko US's business decisions, which Jinko Malaysia and Jinko Vietnam enjoy as if they conducted their business through their own offices or paid agents in California, where Jinko US has an office.

21. On information and belief, Defendants Jinko China and JinkoSolar makes, sells, and imports infringing solar modules in and into the United States through their U.S.- and foreign-based agents, including Jinko Industries, Jinko US, Jinko Malaysia, and Jinko Vietnam.

22. Defendants also induce their subsidiaries, distributors, affiliates, retailers, suppliers, integrators, and customers in the making, using, selling, offering for sale, and/or importing of such products to and throughout the United States, including this District. Defendants further contribute to infringement in the United States and this District by importing specially made solar cells that are assembled into infringing solar modules in the United States. Defendants and their U.S.- and foreign-based subsidiaries work in concert, acting as principal

and agents, to implement a distribution channel of infringing products within the United States and this District.

23. On information and belief, Defendants maintain a substantial corporate presence in the United States via at least their U.S.-based subsidiaries, affiliates and agents, Jinko Industries and Jinko US. Alone and through at least the activities of their U.S.-based subsidiaries, affiliates, and agents, Defendants conduct business in the United States and in this District including making, using, selling, offering for sale, and importing solar modules that infringe the '214 Patent. Through importation, distribution, sales, offers to sell Jinko solar modules directly to customers or through distributors operating in and maintaining significant business presences in the United States and in Texas, Defendants conduct extensive business in the United States, the State of Texas, and this District.

#### **JURISDICTION AND VENUE**

24. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, et seq., including 35 U.S.C. § 271. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

25. Defendants are subject to this Court's specific and general personal jurisdiction consistent with the requirements of the Due Process Clause of the United States Constitution and the Texas Long Arm Statute because, among other things, Defendants, acting in concert with each other and as principal and agents, have (i) done and continue to do substantial, continuous, and systematic business in Texas and this District, including marketing, selling, and distributing infringing solar modules, including to end-customers in Texas and this District, directly and/or through intermediaries (including subsidiaries, distributors, affiliates, retailers, suppliers, integrators, and customers); (ii) committed and continue to commit acts of patent infringement in

Texas and this District, directly and/or through intermediaries (including subsidiaries, distributors, affiliates, retailers, suppliers, integrators, and customers). Such acts of infringement include using, offering for sale, and/or selling infringing solar modules in Texas and this District, importing infringing solar modules into Texas and this District, inducing others to commit patent infringement in this State, and contributing to patent infringement by importing solar cells into the United States for assembly into infringing solar modules for sale in Texas and this District.

26. On information and belief, Defendants have derived substantial revenue from sales of the infringing solar modules to residents of Texas and this District. Defendants have engaged in marketing and promotional activities targeted at residents of Texas and this District, including marketing to end-customers in Texas and this District.

27. Defendants have purposefully and voluntarily placed, and are continuing to place, the infringing solar modules into the stream of commerce through established distribution channels with the expectation, knowledge, and intent that such products will be imported, sold to, and purchased by end-users in Texas and this District.

28. JinkoSolar and Jinko China control and otherwise direct and authorize all activities of their U.S.- and foreign-based subsidiaries to conduct infringing activities on their behalf. For example, in a recent press release, JinkoSolar stated that it “distributes its solar products and sells its solutions and services to ... commercial and residential customer base in ... the United States” and that it has a “global sales network with sales teams in ... the United States....” See <https://ir.jinkosolar.com/news-releases/news-release-details/jinkosolar-schedules-2024-annual-general-meeting-be-held>. These solar products, such as the JKM390M-72HBL-V and JKM425N-54HL4-B solar modules, are imported into the United States from Jinko Vietnam

and Jinko Malaysia and are sold and distributed in the United States by Jinko US, and their labels identify Jinko China as the supplier.

29. On information and belief, Defendants have directed their infringing activities in Texas, including by supplying the Permian Energy Centre and the Misae Solar PV Park with solar modules installed in Texas. *See, e.g.,*

<https://www.nsenergybusiness.com/projects/permian-energy-centre/?cf-view>;

<https://www.power-technology.com/data-insights/power-plant-profile-permian-energy-center-solar-pv-park-us/>; <https://www.power-technology.com/data-insights/power-plant-profile-misae-solar-pv-park-us/?cf-view>.

30. Defendants have also sold and supplied a 250 megawatts Taygete I Energy Project located in Pecos County, Texas with over 856,000 Jinko solar modules.

<https://solarbuilddermag.com/news/7x-energy-partners-with-nestle-on-250-mw-taygete-i-solar-in-texas/>

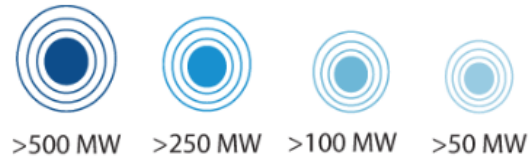
31. On information and belief, Defendants also maintain “dedicated warehouse facilities located in ... Houston TX” to “ensure[] that our solar panels arrive on-time and in pristine condition.” *See* <https://jinkosolar.us/>.

### U.S. DELIVERIES



Our worldwide logistics network ensures that our solar panels arrive on-time and in pristine condition. We have dedicated warehouse facilities located in Long Beach, CA; Houston, TX; Port Elizabeth, NJ; and Jacksonville, FL. Because we understand that our customers value local service, we've built a full-service team located in the heart of Silicon Valley, a nationwide sales team, and a state-of-the-art manufacturing facility in Jacksonville, Florida.

Our U.S. team includes manufacturing, sales, technical support, operations and logistics, marketing, finance, legal, and business development. In all cases, we have the ability to make quick decisions and provide highly responsive customer service.

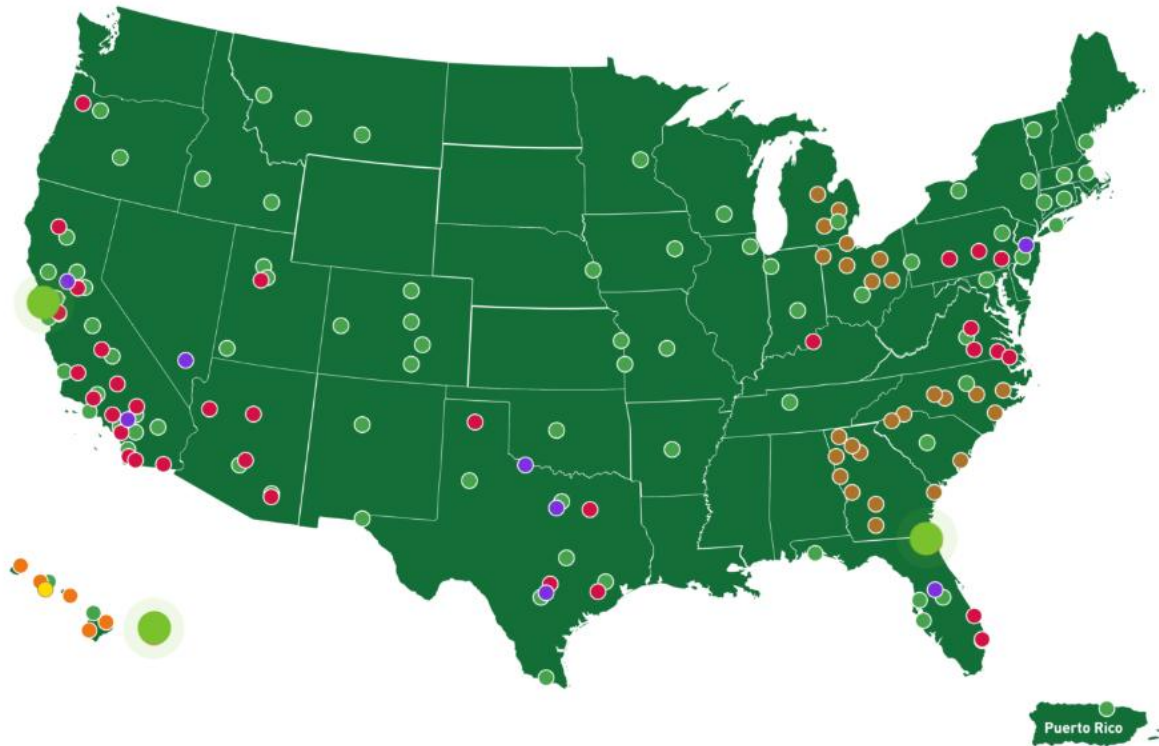


32. Further, Jinko maintains commercial websites accessible to residents of Texas and this District through which Defendants promote, market, advertise, and facilitate the sale and distribution of their infringing products. *See, e.g.*, <https://www.jinkosolar.com/en/> and <https://jinkosolar.us/>. The websites contain product documentation and data sheets for Jinko's infringing products.

33. Jinko's website also lists a number of distributors in Texas from whom Texas residents can purchase infringing solar modules. For example, Jinko's website, <https://jinkosolar.us/professionals/>, identifies and promotes buying from distributors located in Texas, including ABC Supply Co., Inc., Greentech Renewables, and Soligent.

## BUY FROM A DISTRIBUTOR

JinkoSolar authorized distributors are strategically located throughout the United States to provide access to every region of the country. Ready to make a purchase? Speak to one of our distributors below. JinkoSolar also sells direct for large scale commercial and utility projects.



**ABC**  
Supply Co. Inc.  
● ABC Supply Co, Inc.

AZ, CA, FL, KY, OR,  
PA, TX, UT, VA

**GREENTECH**  
-RENEWABLES-  
● Greentech  
Renewables

AR, AZ, CA, CO, CT, FL, HI, ID,  
IL, IN, IO, MA, ME, MD MI, MN,  
MO, MT, NC, NE, NM, NY, OH,  
OK, OR, PA, SC, TN, TX, UT, VT,  
VA, WI, PUERTO RICO

**INTER-ISLAND**  
**SOLAR SUPPLY**

● Inter-Island  
Solar Supply

HI

**McNaughton**  
**& McKay**  
● McNaughton  
& McKay

GA, MI, NC, OH, SC

**R&R**  
Solar Supply  
● R&R Solar Supply

HI

**Soligent**  
● Soligent

CA, FL, NJ, NV, TX



34. On information and belief, ABC Supply Co. Inc. has multiple locations in Texas including the Eastern District of Texas. *See, e.g.*, <https://www.abcsupply.com/locations/>.

Greentech Renewables also has multiple locations in Texas including in Buda, Corpus Christi, Arlington, El Paso, Houston, Katy, Lubbock, McAllen, and San Antonio, Texas. *See, e.g.*, <https://www.greentechrenewables.com/locations/1-s/TX>. Soligent has its main office in Dallas, Texas and its North Texas Distribution Center in Arlington, Texas.

<https://www.soligent.net/contact-us>.

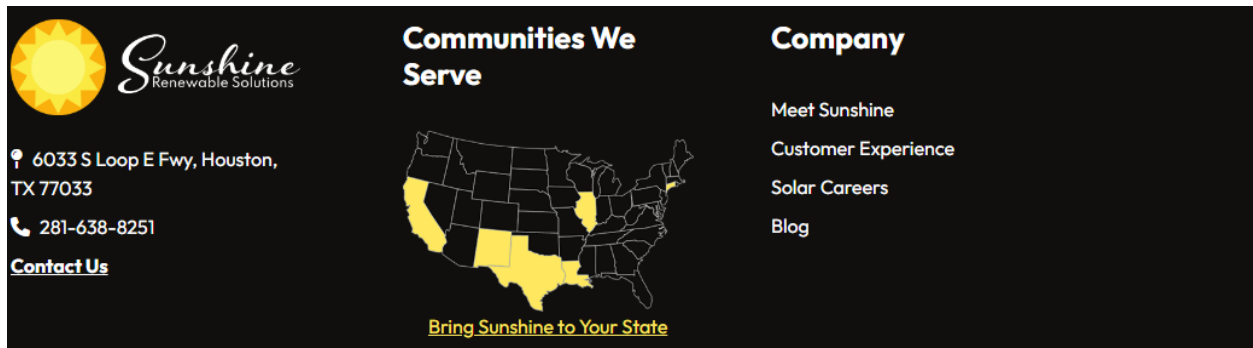
35. On information and belief, Defendants also supply consumers in Texas and in particular, the Eastern District of Texas with solar modules through Sunshine Renewables Solutions. *See* <https://sunshinerenewable.com/jinko-solar-panels/>. Sunshine Renewables Solutions states that they sell and install Jinko solar panels throughout Texas from their headquarters in Houston and “local solar offices all over Texas, including Austin, San Antonio, and Dallas.”

## JinkoSolar Solar Panels in Houston TX

Are you looking for JinkoSolar solar panels in Houston TX? At Sunshine Renewable Solutions we have the latest JinkSolar solar panel models you are looking for, that will help your solar panel system stay in optimum conditions.

Whether you are interested in solar panels, solar panel inverters, or solar panel battery backups, you can browse through the solar products we install, call our solar experts or come visit one of our local offices located in Houston, Austin, Dallas, San Antonio, El Paso, and Amarillo TX.

Regardless of your solar needs, we are sure you'll be impressed by knowledge of solar energy and solar systems. And although we are headquartered in Houston, we have local solar offices all over Texas, including Austin, San Antonio, and Dallas. We look forward to working with you!



36. On information and belief, Defendants have supplied and continue to supply residential customers in Texas and in particular, the Eastern District of Texas with Jinko solar modules installed by installers such as Universal Solar System. *See* <https://universalsolarsystem.net/>. Universal Solar System has an office at 305 W. Spring Creek Pkwy, Suite 100 B, Plano, Texas 75023, which is within the Eastern District of Texas. Universal Solar System lists on its website a number of residential projects in which it has installed Jinko solar modules on homes within the Eastern District of Texas, specifically in Plano, Texas. *See, e.g.,* <https://universalsolarsystem.net/portfolio/residential-solar-panel-installation-9-28-kw-plano-tx/>; <https://universalsolarsystem.net/portfolio/residential-solar-panel-installation-9-28-kw-plano-tx-2/>; and <https://universalsolarsystem.net/portfolio/residential-solar-panel-installation-12-47-kw-plano-tx-1/>.

37. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because, among other things, Defendants are foreign corporations not resident in the United States, and thus may be sued in any judicial district, including this one, pursuant to 28 U.S.C. § 1391(c)(3).

#### **THE PATENT-IN-SUIT**

38. U.S. Patent No. 9,515,214 (“the ’214 Patent”) is titled “Solar Battery Module and Manufacturing Method Thereof.” The ’214 Patent was duly and legally issued by the U.S. Patent and Trademark Office on December 6, 2016. The ’214 Patent was initially filed as a PCT

application on July 2, 2010, published as PCT Publication WO2012/001815 on January 5, 2012, and as U.S. Patent Publication 2013/0098423A1 on April 25, 2013. The named inventors are Koji Shimasaki and Masayoshi Suzuki.

39. The '214 Patent was initially assigned to Mitsubishi Electric Corporation by the inventors. The assignment was executed on November 16, 2012, and recorded with the U.S. Patent and Trademark Office on December 24, 2012.

40. On October 20, 2020, Mitsubishi Electric Corporation assigned the '214 Patent to LONGi Green Energy Technology Co., Ltd. The assignment was recorded with the U.S. Patent and Trademark Office on January 20, 2021.

41. LONGi Green is the sole and exclusive owner of all right, title, and interest in the '214 Patent and holds the exclusive right to take all actions necessary to enforce its rights in, and to, the '214 Patent, including the filing of this patent infringement lawsuit. LONGi Green also has the right to recover all damages for past, present, and future infringements of the '214 Patent and to seek injunctive relief as appropriate under the law.

42. The '214 Patent is generally directed to an innovative solar module using, for example, half cells electrically wired in an arrangement that increases module power output by reducing interconnector resistance losses, while maintaining equivalent electrical characteristics to modules having non-divided cells. Specifically, the '214 Patent discloses a solar module in which individual solar cells are divided into a number of substantially rectangular solar cells. Adjacent cells are serially connected together by one or more interconnectors to form a cell string. A plurality of cell strings are then connected in parallel, and a plurality of parallel-connected cell strings are then connected in series to form the solar module or solar panel.

43. The solar module as claimed in the '214 Patent uses divided solar cells to reduce the electric current flowing in the interconnector that serially connects the solar cells to each other, thereby reducing resistance loss and improving the output of the solar module.

44. Independent claim 1 of the '214 Patent recites:

1. A solar battery module comprising:

a plurality of solar battery cells, a plain shape of each being a substantial rectangle, and a ratio of a short side length and a long side length of the substantial rectangle being  $1/n:1$  ( $n$  is an integer equal to or larger than 2), includes a plurality of light-receiving-surface bus electrodes parallel to the short side of the substantial rectangle on a light receiving surface, and includes rear-surface bus electrodes each at a position on a non-light-receiving surface corresponding to each of the light-receiving-surface bus electrodes; and

an interconnector that electrically connects the light-receiving-surface bus electrodes of a first one of the solar battery cells to the rear-surface bus electrodes of an adjacent second one of the solar battery cells, wherein a predetermined number of the solar battery cells are serially connected to each other, thereby configuring a cell string,  $n$  columns of the cell strings are connected in parallel by a first string connector at one end of the  $n$  columns, the  $n$  in the number of columns of the cell strings connected in parallel being equal to the  $n$  in the ratio of the long side length to the short side length, and the  $n$ -column parallel-connected cell strings are further serially connected to another  $n$ -column parallel-connected cell strings by a second string connector at an opposite end of the  $n$  columns, thereby configuring an entire cell array.

45. The '214 Patent discloses and claims novel and non-obvious subject matter that represents improvements over conventional solar modules that were available as of the priority date of the '214 Patent.

## COUNT I

### (INFRINGEMENT OF U.S. PATENT NO. 9,515,214)

46. LONGi Green incorporates by reference all allegations of paragraphs 1-45 above, as if fully set forth herein.

47. This cause of action arises under the patent laws of the United States, and, in particular, 35 U.S.C. §§ 271, *et seq.*

48. The '214 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code. The '214 Patent has been in full force and effect since its issuance on December 6, 2016.

49. LONGi Green is the owner by assignment of the entire right, title, and interest in and to the '214 Patent including the right to exclude others and to sue and recover damages for past, current, and future infringement.

50. Defendants have and continue to directly infringe at least claim 1 of the '214 Patent under 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, or offering for sale the Accused Products in the United States and this District through its agents, and by importing the Accused Products into the United States and this District without any authorization from LONGi Green.

51. Defendants have directly infringed and continues to directly infringe, by itself or through agents and intermediaries (including subsidiaries, distributors, affiliates, retailers, suppliers, integrators, and customers) by making, using, selling, offering for sale, and/or importing the infringing solar modules in and into the United States. On information and belief, Defendants makes certain ones of infringing solar modules outside of the United States and sells, delivers, and/or imports those products to its customers, agents, distributors, and/or subsidiaries

in the United States for sale in the United States. To the extent that Defendants deliver the infringing solar modules outside of the United States, they do so intending and/or knowing that those products are destined for sale in the United States. Defendants also direct their subsidiaries and/or affiliates, such as Jinko Industries, to make certain ones of the infringing solar modules in the United States.

52. A claim chart illustrating Jinko's infringement of claim 1 of the '214 Patent is attached as Exhibit 1 and incorporated herein by reference as if fully set forth herein.

53. On information and belief, the infringing Jinko solar modules include at least the following:

- EAGLE G6X modules (e.g., JKM570N-72HL4-BDX, JKM575N-72HL4-BDX, JKM580N-72HL4-BDX, JKM585N-72HL4-BDX, JKM590N-72HL4-BDX),
- EAGLE G6B modules (e.g., JKM580N-72HL4-BDV, JKM585N-72HL4-BDV, JKM590N-72HL4-BDV, JKM595N-72HL4-BDV, JKM600N-72HL4-BDV),
- EAGLE G6R modules (e.g., JKM420N-54HL4-B, JKM425N-54HL4-B, JKM430N-54HL4-B, JKM435N-54HL4-B, JKM440N-54HL4-B),
- EAGLE 72 G5b modules (e.g., JKM525M-72HL4-TV, JKM530M-72HL4-TV, JKM535M-72HL4-TV, JKM540M-72HL4-TV, JKM545M-72HL4-TV),
- EAGLE 72 G6b modules (e.g., JKM570N-72HL4-BDV, JKM575N-72HL4-BDV, JKM580N-72HL4-BDV, JKM585N-72HL4-BDV, JKM590N-72HL4-BDV),
- EAGLE 72HM G5 modules (e.g., JKM520M-72HL4-V, JKM525M-72HL4-V, JKM530M-72HL4-V, JKM535M-72HL4-V, JKM540M-72HL4-V),
- EAGLE 78TR G4b modules (e.g., JKM455M-7RL3-TV, JKM460M-7RL3-TV, JKM465M-7RL3-TV, JKM470M-7RL3-TV, JKM475M-7RL3-TV),

- EAGLE 66TR G4 modules (e.g., JKM370M-6RL3-B, JKM375M-6RL3-B, JKM380M-6RL3-B, JKM385M-6RL3-B, JKM390M-6RL3-B, JKM395M-6RL3-B, JKM400M-6RL3-B),
- EAGLE 72HM G3 modules (e.g., JKM385M-72HL-TV, JKM390M-72HL-TV, JKM395M-72HL-TV, JKM400M-72HL-TV, JKM405M-72HL-TV),
- EAGLE 72HM G2 modules (e.g., JKM390M-72HL-V, JKM395M-72HL-V, JKM400-72HL-V, JKM40572HL-V, JKM410M-72HL-V), and
- EAGLE 60HM G2 modules (e.g., JKM300M-60HBL, JKM315M-60HBL, JKM320M-60HBL, JKM325M-60HBL, JKM330M-60HBL).
- EAGLE CONTINENTAL modules (e.g., JKM380M-72HBL-V, JKM385M-72HBL-V, JKM390M-72HBL-V, JKM395M-72HBL-V, JKM400M-72HBL-V),
- EAGLE MX3 72HM G2 modules (e.g., JKMS380M-72HL-MX-V, JKMS385M-72HL-MX-V, JKMS390M-72HL-MX-V, JKMS395M-72HL-MX-V, JKMS400M-72HL-MX-V),
- EAGLE HC 72HM G2 modules (e.g., JKM380M-72HL-V, JKM385M-72HL-V, JKM390M-72HL-V, JKM395M-72HL-V, JKM400M-72HL-V),
- Cheetah Plus HC 66M modules (e.g., JKM360M-66H, JKM360M-66H-V, JKM365M-66H, JKM365M-66H-V, JKM370M-66H, JKM370M-66H-V, JKM375M-66H, JKM375M-66H-V, JKM380M-66H, JKM380M-66H-V),
- Cheetah Plus HC 78M modules (e.g., JKM425M-78H, JKM425M-78H-V, JKM430M-78H, JKM430M-78H-V, JKM435M-78H, JKM435M-78H-V, JKM440M-78H, JKM440M-78H-V, JKM445M-78H, JKM445M-78H-V),



- Cheetah HC 60M modules (e.g., JKM325M-60H, JKM325M-60H-V, JKM330M-60H, JKM330M-60H-V, JKM335M-60H, JKM335M-60H-V, JKM340M-60H, JKM340M-60H-V, JKM345M-60H, JKM345M-60H-V),
- Cheetah HC 72M modules (e.g., JKM390M-72H, JKM390M-72H-V, JKM395M-72H, JKM395M-72H-V, JKM400M-72H, JKM400M-72H-V, JKM405M-72H, JKM405M-72H-V, JKM410M-72H, JKM410M-72H-V),
- Tiger Neo 72HL4-(V) modules (e.g., JKM565N-72HL4, JKM565N-72HL4-V, JKM570N-72HL4, JKM570N-72HL4-V, JKM575N-72HL4, JKM575N-72HL4-V, JKM580N-72HL4, JKM580N-72HL4-V, JKM585N-72HL4, JKM585N-72HL4-V, JKM590N-72HL4, JKM590N-72HL4-V, JKM595N-72HL4, JKM595N-72HL4-V, JKM600N-72HL4, JKM600N-72HL4-V, JKM605N-72HL4, JKM605N-72HL4-V),
- Tiger Neo 54HL4R-BDB modules (e.g., JKM425N-54HL4R-BDB, JKM430N-54HL4R-BDB, JKM435N-54HL4R-BDB, JKM440N-54HL4R-BDB, JKM445N-54HL4R-BDB, JKM450N-54HL4R-BDB),
- Tiger Neo 54HL4R-B modules (e.g., JKM430N-54HL4R-B, JKM435N-54HL4R-B, JKM440N-54HL4R-B, JKM445N-54HL4R-B, JKM450N-54HL4R-B, JKM455N-54HL4R-B),
- Tiger Neo 54HL4R-(V) modules (e.g., JKM435N-54HL4R, JKM435N-54HL4R-V, JKM440N-54HL4R, JKM440N-54HL4R-V, JKM445N-54HL4R, JKM445N-54HL4R-V, JKM450N-54HL4R, JKM450N-54HL4R-V, JKM455N-54HL4R, JKM455N-54HL4R-V, JKM460N-54HL4R, JKM460N-54HL4R-V),
- Tiger Neo 60HL4-(V) modules (e.g., JKM475N-60HL4, JKM475N-60HL4-V, JKM480N-60HL4, JKM480N-60HL4-V, JKM485N-60HL4, JKM485N-60HL4-V,

JKM490N-60HL4, JKM490N-60HL4-V, JKM495N-60HL4, JKM495N-60HL4-V,  
JKM500N-60HL4, JKM500N-60HL4-V),

- Tiger Neo 72HL4-BDV modules (e.g., JKM575N-72HL4-BDV, JKM580N-72HL4-BDV, JKM585N-72HL4-BDV, JKM590N-72HL4-BDV, JKM595N-72HL4-BDV, JKM600N-72HL4-BDV),
- Tiger Neo 72HL4-(V) modules (e.g., JKM580N-72HL4, JKM580N-72HL4-V, JKM585N-72HL4, JKM585N-72HL4-V, JKM590N-72HL4, JKM590N-72HL4-V, JKM595N-72HL4, JKM595N-72HL4-V, JKM600N-72HL4, JKM600N-72HL4-V, JKM605N-72HL4, JKM605N-72HL4-V),
- Tiger Neo 66HL4M-BDV modules (e.g., JKM605N-66HL4M-BDV, JKM610N-66HL4M-BDV, JKM615N-66HL4M-BDV, JKM620N-66HL4M-BDV, JKM625N-66HL4M-BDV, JKM630N-66HL4M-BDV),
- Tiger Neo 66HL4M-(V) modules (e.g., JKM610N-66HL4M, JKM610N-66HL4M-V, JKM615N-66HL4M, JKM615N-66HL4M-V, JKM620N-66HL4M, JKM620N-66HL4M-V, JKM625N-66HL4M, JKM625N-66HL4M-V, JKM630N-66HL4M, JKM630N-66HL4M-V, JKM635N-66HL4M, JKM635N-66HL4M-V), and
- Tiger Neo 78HL4-BDV modules (e.g., JKM625N-78HL4-BDV, JKM630N-78HL4-BDV, JKM635N-78HL4-BDV, JKM640N-78HL4-BDV, JKM645N-78HL4-BDV, JKM650N-78HL4-BDV).

54. In addition and/or in the alternative to Defendants' direct infringement, Defendants have indirectly infringed and continues to indirectly infringe at least claim 1 of the '214 Patent under 35 U.S.C. § 271(b), by knowingly and intentionally inducing others (including subsidiaries, distributors, affiliates, agents, retailers, suppliers, integrators, and customers) to

directly infringe by making, using, offering to sell, selling, and/or importing the Accused Products into the United States.

55. On information and belief, Defendants have had knowledge of the '214 Patent and its parent publication before the filing of this lawsuit. For example, the '214 Patent and/or the parent publication that issued as the '214 Patent was identified to Jinko in at least two of Jinko's own pending patent applications, including CN104716225A, which names Kangping Chen (the President/CEO of Jinko China and CEO of Jinko Industries) as an inventor and was published on June 17, 2015, and CN111370536A, which published on July 3, 2020.

56. In August 2024, LONGi Green also notified Jinko of its infringement of the '214 Patent family through Jinko's agent, Mr. Dan Shang, general manager of Shangrao Xinyuan Yuedong Technology Development Ltd, a subsidiary of Jinko. Upon information and belief, Mr. Shang notified Jinko of the '214 Patent family and its infringement.

57. Defendants have actively induced the direct infringement of at least claim 1 of the '214 Patent by others (including subsidiaries, distributors, affiliates, agents, retailers, suppliers, integrators, and customers) with the specific intent or willful blindness to the fact that the acts induced constitute infringement of the '214 Patent. For example, Defendants' subsidiaries, distributors, affiliates, agents, retailers, suppliers, integrators, customers, and end-users directly infringe through their using, selling, offering for sale, and/or importing the inventions claimed in the '214 Patent. As one example, Defendants induce this direct infringement through creating and/or maintaining established distribution channels for the infringing Jinko solar modules that are imported into the United States by or on behalf of Defendants' US-based agents, distributors, or subsidiaries. Defendants have also induced the direct infringement of the '214 Patent by

instructing its agents, including Jinko Industries to manufacture infringing solar modules in the United States.

58. Defendants further contribute to the infringement of at least claim 1 of the '214 Patent under 35 U.S.C. § 271(c), by causing their agents or subsidiaries Jinko Vietnam and/or Jinko Malaysia to sell and/or import specially made solar cells into the United States for use in making infringing Jinko solar modules. Defendants also direct their agent or subsidiary, including Jinko Industries, to assemble the imported cells into the infringing Jinko solar modules. For example, Jinko's JKM390M-72HBL-V states on its label: "Modules assembled in the USA from solar cells made in Vietnam." Such solar cells are made and designed to be assembled into the Accused Products and are not a staple article or commodity of commerce suitable for substantial non-infringing use.

59. LONGi Green has been damaged as a result of Defendants' infringing conduct described herein and thus Defendants are liable to LONGi Green in an amount that adequately compensates LONGi Green for Defendants' infringement, which, by law, cannot be less than a reasonable royalty, together with interest and costs.

60. On information and belief, despite having knowledge of the '214 Patent since at least 2015 and knowledge that the infringing Jinko solar modules directly and/or indirectly infringes the '214 Patent since at least August 2024, Defendants have willfully continued their infringing conduct, warranting enhanced damages under 35 U.S.C. § 284 and making this an exceptional case that warrants an award of attorney fees to LONGi Green under 35 U.S.C. § 285.

#### **PRAYER FOR RELIEF**

WHEREFORE, LONGi Green prays for a judgment in its favor and against Jinko and respectfully requests the following relief:

- A. A judgment that Jinko infringes the '214 Patent;
- B. Damages for infringement of the '214 Patent in an amount to be determined at trial;
- C. An order permanently enjoining Jinko from further infringement of the '214 Patent;
- D. For other monetary relief, including costs and expenses and pre- and post-judgment interest;
- E. A determination that Jinko's infringement of the '214 Patent has been and is willful, and an award of enhanced damages, up to and including trebling of the damages awarded to LONGi Green;
- F. A determination that this is an exceptional case under 35 U.S.C. § 285 and an award of attorneys' fees and costs to LONGi Green;
- G. An order awarding LONGi Green any such other relief as the Court may deem just and proper under the circumstances.

### **JURY DEMAND**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff hereby demands a jury trial as to all issues so triable.

Date: January 17, 2025

Respectfully submitted,

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