

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**ELECTRASENSE TECHNOLOGIES,
LLC,**

Plaintiff,

v.

**THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,**

Defendants.

Civil Action No. 1:24-cv-9499

ORIGINAL COMPLAINT

Plaintiff Electrasense Technologies, LLC (“Plaintiff”) hereby brings this patent infringement action against the Partnerships and Unincorporated Associations identified in Schedule A (collectively, “Defendants”) and alleges as follows:

INTRODUCTION

1. Plaintiff files this action to combat foreign patent infringers who trade upon Plaintiff’s patented invention by selling, offering for sale, and/or importing unlicensed products, namely the Wall Socket with load detecting circuit shown in Exhibit 1 (“Infringing Product”). The Defendants operate several Amazon storefronts (“Defendant Online Stores”) that, upon information and belief, sell Infringing Products to Illinois consumers. The Defendant Online Stores share unique identifiers, such as identical product images, specifications, advertising, identical design elements, establishing a logical relationship between them and suggesting that Defendants’ operations arises out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and

the full scope and interworking of their operation. Plaintiff has been and continues to be irreparably damaged from the loss of its lawful patent rights to exclude others from making, using, selling, offering for sale, and importing its patented invention as a result of Defendants' actions and seeks equitable relief.

JURISDICTION AND VENUE

2. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Patent Act, 35 U.S.C. § 1, *et seq.*, 28 U.S.C. § 1338(a)-(b) and 28 U.S.C. § 1331.

3. This Court may properly exercise personal jurisdiction over Defendants since Defendants directly target business activities toward consumers in the United States, including Illinois, through at least the fully interactive, commercial Defendant Online Stores. Specifically, Defendants are reaching out to do business with Illinois residents by operating the Defendant Online Stores through which Illinois residents can and do purchase Infringing Products. Defendants target sales from Illinois residents by operating online stores that offer shipping to the United States, including Illinois, accept payment in United States dollars and, on information and belief, have sold Infringing Products to residents of Illinois. *See* Exhibit 1, Illinois Offers for Sale. Defendants are committing tortious acts in Illinois, are engaging in interstate commerce, and have wrongfully caused Plaintiff substantial injury in the State of Illinois.

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 as Defendants are believed to be Chinese entities.

THE PARTIES

5. Plaintiff is a Texas limited liability company with a principal place of business in Dallas, Texas. Plaintiff is the owner by assignment of the United States Patent Electrasense Technologies, LLC identified in Exhibit 2 (“Patent”).

6. Upon information and belief, Defendants are Amazon storefronts operating from the perceived safety of China. Defendants conduct business throughout the United States, including within the State of Illinois and this Judicial District, through the Defendant Online Stores.

7. Upon information and belief, Defendants are under the common control of one entity or individual. They are an interrelated group of infringers working in active concert to offer for sale, sell, and/or import into the United States the Infringing Product which directly infringes the Patent in the same transaction, occurrence, or series of transactions or occurrences. As one example, Defendants are listed under one entity for their Intertek certifications (see, [Intertek ETL Listed Directory \(intertekconnect.com\)](https://intertekconnect.com)), which demonstrates that each defendant is related. As another example, Defendants sell and/or offer for sale the same Infringing Product with a power converting circuit arranged in the socket housing and configured to convert the input voltage to the dc output voltage according to a control signal as well as similar product images and descriptions, as shown in Exhibit 1. Tactics used by Defendants to conceal their identities, and the full scope of their operation make it virtually impossible for Plaintiff to learn Defendants’ true identities and the exact interworking of their infringement network. In the event that Defendants provide additional credible information regarding their identities, Plaintiff will take appropriate steps to amend the Complaint.

8. Defendants go to great lengths to conceal their identities and often use multiple fictitious names and addresses to register and operate their network of Defendant Online Stores.

On information and belief, Defendants regularly create new Amazon storefronts to allocate potential liability. Such registration patterns are one of many common tactics used by the Defendants to conceal their identities, the full scope and interworking of their operation, and to avoid being shut down in response to infringement notices.

9. Even though Defendants operate under multiple fictitious names, there are numerous similarities among the Defendant Online Stores. The Defendant Online Stores include notable common features beyond selling the exact same unique a power converting circuit arranged in the socket housing and configured to convert the input voltage to the dc output voltage according to a control signal designed on the Infringing Product, including the same product images, product descriptions, accepted payment methods, lack of contact information, identically or similarly priced items, and the use of the same advertising text and images.

10. In addition to operating under multiple fictitious names, Defendants in this case and defendants in other similar cases against online infringers use a variety of other common tactics to evade enforcement efforts. For example, infringers like Defendants will often register new online marketplace accounts under new aliases once they receive notice of a lawsuit. Infringers also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border Protection.

11. Further, infringers such as Defendants typically operate multiple credit card merchant accounts and PayPal accounts behind layers of payment gateways so that they can continue operation in spite of Plaintiff's enforcement efforts, such as take down notices. On information and belief, Defendants maintain off-shore bank accounts and regularly move funds from their PayPal accounts or other financial accounts to off-shore bank accounts outside the jurisdiction of this Court. Indeed, analysis of PayPal transaction logs from previous similar cases

indicates that offshore infringers regularly move funds from United States based PayPal accounts to China based bank accounts outside the jurisdiction of this Court.

THE PATENTED TECHNOLOGY

12. The Patent was filed on January 19, 2016 and duly issued November 7, 2016.

13. The Patent discloses a wall socket, which has an input terminal configured to receive an input voltage from a power grid, an output terminal, a power converting circuit, and a load detecting circuit. The output terminal outputs a DC output voltage. The power converting circuit converts the input voltage to a dc output voltage according to a control signal. The load detecting circuit receives an identification signal output by an electronic device and then outputs the control signal according to the identification signal to adjust the level of the DC output voltage. The level of the DC output voltage varies according to the identification signal and is selected from a plurality of different voltage levels. In the prior art, USB wall sockets only provided a fixed output voltage, which was insufficient to satisfy the charging requirements of various modern devices, such as smart phones and tablets. Additionally, the fixed power output of the prior art USB wall sockets resulted in power consumption during the standby state leading to excess energy loss (Patent at 1:16-27). In contrast, the invention improves upon prior designs by integrating a load detection circuit that identifies the voltage requirements of an electronic device and dynamically adjusts the DC output. Among other advantages, this approach ensures compatibility with various devices and enhances power management efficiency.

14. Plaintiff is the owner of the Patent with all substantive rights in and to the Patent, including the sole and exclusive right to prosecute this action and enforce the Patent against infringers, and to collect damages for all relevant times.

15. Plaintiff and/or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the Patent.

16. The Patent enjoys a presumption of validity pursuant to the 35 U.S.C. § 282.

THE INFRINGING PRODUCT

17. Defendants sell, offer to sell, and/or import the wall socket Infringing Products. The Infringing Products are wall sockets which include a socket housing, an output terminal, a power converter circuit and a load detection circuit. *See* Exhibit 1.

18. Plaintiff has not granted a license or any other form of permission to Defendants to practice the Patent.

19. Defendants have had actual notice of the Patent since at least the filing of the Complaint. To these ends, Defendants' infringement of the Patent is and continues with utter disregard for Plaintiff's patent rights.

COUNT I: PATENT INFRINGEMENT (35 U.S.C. § 271)

20. Plaintiff hereby re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs.

21. Defendants offer for sale, sell, and/or import into the United States the Infringing Product which infringes one or more claims of the Patent, either literally and/or under the doctrine of equivalents.

22. For example, the Infringing Product meet each and every limitation of at least Claim 1 of the Patent. An exemplary infringement chart is attached as Exhibit 3.

23. Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to recover damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendants, together with interest and costs as fixed by the court.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully demands a trial by jury on all issues triable by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief against Defendants as follows:

- (1) A judgment in favor of Plaintiff and against Defendants for infringement of the Patent, pursuant to 35 U.S.C. § 281;
- (2) That Plaintiff be awarded damages against Defendants that are adequate to compensate Plaintiff for infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendants, together with interest and costs as fixed by the court, pursuant to 35 U.S.C. § 284;
- (3) That Plaintiff be awarded its reasonable attorneys' fees and costs, pursuant to 35 U.S.C. § 285; and
- (4) Any and all other relief that this Court deems just and proper.

Respectfully submitted,

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