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13 *Corporation d/b/a WAC Lighting*

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 WANGS ALLIANCE
18 CORPORATION D/B/A WAC
19 LIGHTING,

20 Plaintiff,

21 v.

22 SCADLOCK, INC. D/B/A ONE
23 PRODUCTS AND PROMOUNTS,

24 Defendant.

Case No. 2:22-cv-02527

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

1 **COMPLAINT**

2 Plaintiff Wangs Alliance Corporation d/b/a WAC Lighting Co. (“WAC”), by
3 and through its attorneys, alleges the following for its Complaint against Scadlock,
4 Inc. d/b/a ONE Products and Promounts (“ONE”):

5 **Nature of the Action**

6 1. This is a civil action for infringement of United States Patent Nos.
7 11,028,854 (the “’854 patent” or “Asserted Patent”). The action arises under the
8 patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

9 **Parties**

10 2. Plaintiff WAC is a New York corporation with its principal place of
11 business located at 44 Harbor Park Drive, Port Washington, New York 11050.

12 3. Upon information and belief, Defendant ONE is a California
13 corporation with its principal place of business at 20218 Hamilton Ave, Torrance,
14 CA 90502. Upon information and belief, ONE does business as ONE Products or
15 Promounts, *e.g.*, through its website at <https://www.one-products.com/>.

16 **Jurisdiction and Venue**

17 4. This action arises under the patent laws of the United States, 35 U.S.C.
18 §§ 1 *et seq.*, including 35 U.S.C. § 271 *et seq.* Accordingly, this Court has
19 exclusive subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and
20 1338(a).

21 5. Upon information and belief, this Court has personal jurisdiction over
22 ONE in this action because ONE has committed acts within the Central District of
23 California giving rise to this action and has established minimum contacts with this
24 forum such that the exercise of jurisdiction over ONE would not offend traditional
25 notions of fair play and substantial justice. ONE, directly and/or through
26 subsidiaries or intermediaries (including distributors, retailers, and others), has
27 committed and continues to commit acts of infringement in this District by, among
28 other things, importing, offering to sell and selling products that infringe the

1 Asserted Patent. Moreover, ONE is incorporated in California, has its principal
2 place of business in Torrance, California (which is within this District), and is
3 registered to do business in the State of California.

4 6. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400.
5 ONE resides in California, which is its state of incorporation. Further, ONE has a
6 regular and established place of business in the Central District of California, in
7 Torrance, California. For example, ONE lists its office in Torrance, California as
8 its “principal executive office” and “principal office” in its most recent Statement
9 of Information filed with the Secretary of State of the State of California on April
10 7, 2020. ONE also advertises its presence in the Central District of California on
11 its website, for example at www.one-products.com/pages/contact-us. Further, upon
12 information and belief, ONE has transacted business in the Central District of
13 California and has committed acts of direct infringement in the Central District of
14 California.

15 **WAC’s Innovation and Protection of Its Technology**

16 7. For over thirty-five years, WAC, a family company, has operated in
17 the United States at the forefront of emerging technologies, producing quality fan
18 and LED lighting solutions that are energy-efficient, long-lasting, and
19 maintenance-free, and promoting green technology. WAC’s investment in
20 electronics development, research and test laboratories, and assembly facilities has
21 culminated in a unique and unparalleled world-class brand, renowned for quality
22 and ingenuity in the industry. Instead of acquiring patents from other market
23 players and copying existing products, WAC has been dedicated to charting its
24 own path of innovation, bringing to the industry new and unique designs and
25 technologies. WAC’s portfolio of patents protects these proprietary designs and
26 technologies.

27 8. Among WAC’s innovations are several novel fan products, which are
28 protected by WAC’s patents in this field.

1 9. One such WAC patent is the ‘854 patent, titled “Methods and
2 Apparatus for Controlling Fan Devices,” which was duly issued by the U.S. Patent
3 Office on June 8, 2021. A copy of the ‘854 patent is attached to this Complaint as
4 Exhibit A.

5 **FIRST CLAIM FOR RELIEF**

6 **(Patent Infringement of United States Patent No. 11,028,854 by ONE)**

7 10. The allegations stated in preceding paragraphs are incorporated by
8 reference as though fully set forth herein.

9 11. WAC is the owner of the ‘854 patent.

10 12. Upon information and belief, ONE makes, uses, sells, offers to sell,
11 and/or imports smart fans model OSCF02-W and OSCF02-B (the “Accused
12 Products”). The specific model numbers listed here are not meant to exhaustively
13 identify all the Accused Products.

14 13. The Accused Products contain all of the elements of at least claim 1 of
15 the ‘854 patent, arranged as recited in that claim.

16 14. Specifically, upon information and belief based upon an investigation
17 of the Accused Products, to the extent the preamble is found to be limiting, each of
18 the Accused Products is a system.

19 15. Upon information and belief based upon an investigation of the
20 Accused Products, each of the Accused Products includes a fan motor.

21 16. Upon information and belief based upon an investigation of the
22 Accused Products, each of the Accused Products includes a fan motor control
23 circuit.

24 17. Upon information and belief based upon an investigation of the
25 Accused Products, each of the Accused Products includes a processor in electrical
26 communication with the fan motor control circuit.

27 18. Upon information and belief based upon an investigation of the
28 Accused Products, each of the Accused Products includes a radio frequency

1 interface configured to receive, at a first frequency, a signal.

2 19. Upon information and belief based upon an investigation of the
3 Accused Products, each of the Accused Products includes a WiFi interface
4 configured to communicate at a second frequency that is different from the first
5 frequency.

6 20. Upon information and belief based upon an investigation of the
7 Accused Products, in each of the Accused Products the fan motor control circuit is
8 configured to cause the fan motor to perform an operation in response to the signal.

9 21. Upon information and belief based upon an investigation of the
10 Accused Products, in each of the Accused Products the processor is configured to
11 transmit, via the WiFi interface, to a server, an indication corresponding to the
12 operation.

13 22. By making, using, testing, offering for sale, selling, and/or importing
14 the Accused Products, ONE has injured WAC and is liable to WAC for directly
15 infringing one or more claims of the '854 patent, including at least claim 1,
16 pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents.

17 23. Furthermore, ONE's infringing activities have continued and are
18 continuing with knowledge of the '854 patent, and with knowledge of ONE's
19 infringement of the '854 patent. In particular, on February 15, 2022, WAC sent
20 ONE a cease-and-desist letter stating that the Accused Products infringe the '854
21 patent and demanding that ONE stop selling the Accused Products. WAC followed
22 up this letter with additional correspondence, which was all received by ONE.
23 ONE declined to comply with WAC's demands. ONE's acts of infringement have
24 therefore been intentional, deliberate, and willful.

25 24. WAC has been damaged by ONE's infringement of the '854 patent,
26 and WAC is suffering and will continue to suffer irreparable harm and damage as a
27 result of this infringement unless such infringement is enjoined by this Court.
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PRAYER FOR RELIEF

WHEREFORE, for the reasons set forth above, WAC respectfully requests that this Court enter judgement in its favor, and against ONE, and award relief including, but not limited to, the following:

- A. A judgment that ONE has infringed the ‘854 patent;
- B. An order permanently enjoining ONE from further acts of infringement of the ‘854 patent;
- C. An award of damages adequate to compensate WAC for all of ONE’s unauthorized acts of infringement, and an order trebling such damages given ONE’s willful and deliberate acts of infringement;
- D. A declaration that this case is exceptional within the meaning of 35 U.S.C. § 285 and an award of WAC’s reasonable attorneys’ fees and other costs and expenses incurred in the prosecution of this action;
- E. An award of pre-judgment interest under 35 U.S.C. § 284, and post-judgment interest under 28 U.S.C. § 1961;
- F. An award of any other or further relief as this Court deems just and proper.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, WAC demands trial by jury of all issues so triable in this action.

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Dated: April 14, 2022

Respectfully submitted,

/s/ Brian J. Dunne

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