

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<p>LITEPANELS, LTD,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>BILL &amp; MIKE’S PHOTO, INC. D/B/A MIDWEST PHOTO EXCHANGE and LUMOPRO, INC. D/B/A MPEX DISTRIBUTION</p> <p style="text-align: center;">Defendants.</p>
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Civil Action No. 2:22-cv-3143

**DEMAND FOR JURY TRIAL**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, Litepanels, Ltd. (“Litepanels”) for its Complaint against Defendants Bill & Mike’s Photo, Inc. d/b/a Midwest Photo Exchange (“Midwest”) and LumoPro, Inc. d/b/a MPEX Distribution (“MPEX”) (collectively with “Midwest,” the “Defendants”), hereby alleges as follows:

**PARTIES**

1. Plaintiff Litepanels Ltd. (“Litepanels”) is a United Kingdom private limited company with its principal place of business located at Bridge House, Heron Square, Richmond, TW9 1EN, United Kingdom.
2. Defendant Midwest is an Ohio corporation with a place of business at 2887 Silver Drive, Columbus, OH 43211.
3. Defendant MPEX is an Ohio corporation with a place of business at 2887 Silver Drive, Columbus, OH 43211.

**JURISDICTION AND VENUE**

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

5. Defendants are subject to personal jurisdiction in this judicial district because they each, individually, conducted and continue to conduct business in this judicial district, including offering for sale and selling in this district at least some of the products at issue in this dispute. Defendants are further subject to personal jurisdiction in this judicial district because they are incorporated and/or organized under the laws of the State of Ohio and maintain a registered agent for service of process in this judicial district.

6. Venue is proper in this Court under 28 U.S.C. § 1400(b) and 28 U.S.C. § 1391(b) because Defendants conducted and/or continue to conduct business in this judicial district, and because at least some of the acts giving rise to this Complaint occurred in this judicial district.

**FACTUAL BACKGROUND**

7. Litepanels is a leading designer and manufacturer of high quality, light emitting diode (“LED”) based lighting systems that have become staples of the United States motion picture, television, and still photography industries. Litepanels’ Emmy Award winning products have revolutionized film, video, and still photography lighting practices, and enjoy tremendous commercial success among both amateur users and lighting professionals. (*See* Emmy Letter (attached as Exhibit A)).

8. Today, Litepanels’ products are used to light a wide-range of popular television news, sports, reality and produced programs, including (a very small sample) the CBS Evening News, FOX and ESPN sports productions, Netflix’s “Stranger Things” and “Sex Education”,

NBC's "The Blacklist", and Fox's "24" as well as movies including: Disney's "Artemis Fowl", "Murder on the Orient Express" and "Rebecca." Litepanels' lighting systems have been installed in both the White House and Pentagon press briefing rooms and are found in the International Space Station. (*See* White House and Application Summary (attached as Exhibit B)).

9. Litepanels' record of developing and launching technically innovative and commercially successful products stems from its ongoing commitment to research, development, and quality manufacturing processes. Throughout its history, Litepanels has made substantial investments to research, develop, and manufacture high-quality LED photographic lighting systems, including its Gemini and Astra product lines. Litepanels acts diligently and aggressively to secure protection for the fruits of its ongoing investments. Litepanels has numerous issued United States and international patents for its innovations including, but not limited to, the following United States Patents: 7,972,022 (the "'022 patent"); 7,318,652 (the "'652 patent"); and 7,510,290 (the "'290 patent") (collectively, the "Asserted Patents").<sup>1</sup>

10. As the popularity and goodwill associated with Litepanels' lighting systems grew, so too did the number of foreign and U.S.-based operations attempting to capitalize on Litepanels' investments and innovations. Litepanels encountered numerous "knock-off" and other low-quality variations of Litepanels' products in the U.S. marketplace.

11. Litepanels has consistently and continuously marked its products which practice the Asserted Patents in compliance with 35 U.S.C. § 287, and to the extent Litepanels licenses the Asserted Patents to third parties, it requires that such third parties also mark their products which practice one or more of the Asserted Patents.

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<sup>1</sup> The '022 Patent, '652 Patent, and '290 Patent have now expired. Plaintiff, pursuant to 35 U.S.C. § 286 seeks infringement damages for the period of time from six years prior to the date of the filing of this complaint through the date of each asserted patent's expiration.

12. The Accused Products are LED lighting devices for illuminating the subject for film, photography or video and include, but are not limited to, certain models and/or product lines manufactured by or for Godox Photo Equipment Co. Ltd. (“Godox”) and previously marketed, offered for sale, and sold, as well as currently marketed, offered for sale, and sold<sup>2</sup>, in the United States, by Defendants.<sup>3</sup> Upon information and belief, the following chart (“Chart”) depicts the specific Godox products and/or product lines Defendants previously sold, currently sell, and/or marketed/market for sale in the United States (“Accused Products”) which directly and/or indirectly infringe the Asserted Patents, with notation as to the specific patent infringed:<sup>4</sup>

PRODUCT AND/OR PRODUCT LINE	‘022 PATENT	‘652 PATENT	‘290 PATENT
CL series (including, but not limited to, CL10)	X		
LC series (including, but not limited to LC500R, LC500)	X		
LD series (including, but not limited to, LD75R, LD150R, LD150RS)	X	X	X
LF series (including, but not limited to, LF308)	X	X	
LR series (including, but not limited to, LR120, LR 150, LR160, LR 180)	X		
Litemons series (including, but not limited to, LED6Bi)	X	X	
LED series (including, but not limited to, LED36, LED64, LED126, LED170, LED170II, LED 308, LED308II, LED500, LED500L, LED500LR, LED1000, LED1000II, LED Video Light)	X	X	X
LEDP series (including, but not limited to, LEDP120, LEDP260)	X		
LEDM series (including, but not limited to, LEDM32, LEDM150)	X		
E-Sports series (including, but not limited to, ES45)	X		
Flexible series (including, but not limited to, FL60, FL100, FL150R, FL150S)	X		

<sup>2</sup> Plaintiff limits its claims that Defendants *currently* market, offer for sale, and sell the Accused Products only to those Accused Products manufactured and/or imported *prior* to expiration of the Asserted Patents.

<sup>3</sup> Godox lists Midwest as a distributor on the “Where to Buy” section of its webpage. *See* [http://www.godox.com/EN/Where\\_to\\_buy.html](http://www.godox.com/EN/Where_to_buy.html) (last visited June 11, 2020).

<sup>4</sup> Upon information and belief, the Accused Products identified in the chart were previously sold or are currently offered for sale in the United States by Defendants. Discovery may reveal that the Accused Products infringe additional patents beyond those identified in the chart. Further, discovery may reveal additional products and/or product lines which infringe one or more of the Asserted Patents. Accordingly, Plaintiff reserves the right to amend its allegations with regard to Accused Products.

FV series (including, but not limited to, FV200)	X		X
Macro series (including, but not limited to, Ring48, Ring72)	X		
ML series (including, but not limited to, ML60Bi)	X		
Mini Creative series (including, but not limited to, M1, R1)	X		
S series (including, but not limited to, S30, S60)	X	X	
SL series (including, but not limited to, SL100D, SL100Bi)	X		
SL series II (including, but not limited to, SL200 IIBi)	X	X	X
SLB series (including, but not limited to, SLB60W, SLB60Y)	X		
SZ series (including but not limited to SZ200Bi)	X	X	
Tube series (including, but not limited to, TL60)	X		
UL series (including, but not limited to, UL60Bi)	X		X
VL series (including, but not limited to, VL300)	X	X	X

13. Upon information and belief, Midwest imports the Accused Products into the United States and operates a brick and mortar retail store at 2887 Silver Drive, Columbus, Ohio 43211 as well as the www.mpex.com website where Midwest offers for sale, markets, and sells the Accused Products which incorporate, without license, many inventions developed by Litepanels and protected by one or more of the Asserted Patents and MPEX fulfils orders on behalf of Midwest, distributing the Accused Products to consumers.

14. Upon information and belief, Midwest and MPEX are held by and through common ownership.

15. Upon information and belief, Defendants imported and continue to import, market, offer for sale, and sell the Accused Products which incorporate, without license, many inventions developed by Litepanels and protected by one or more of the Asserted Patents.

#### **COUNT I - INFRINGEMENT OF THE '022 PATENT**

16. Plaintiff incorporates paragraphs 1 through 15 above by reference.

17. The '022 patent, entitled "Stand-Mounted Light Panel For Natural Illumination in Film, Television or Video," issued July 5, 2011 to inventors Rudy Pohlert, Pat Grosswendt, Kevin Baxter, and Ken Fisher.

18. Litepanels owns all right, title, and interest to the '022 patent, a copy of which is attached to this Complaint as Exhibit C.

19. Defendants have infringed at least claim 1 of the '022 patent in this District and throughout the United States by importing, using, selling and/or offering for sale the Accused Products. Each of the Accused Products meet each and every limitation of at least claim 1 of the '022 patent. Defendants have infringed literally and/or under the doctrine of equivalents.

20. For example, Defendants marketed, offered for sale, and sold, as well as currently market, offer for sale, and sell<sup>5</sup>, through their retail location(s), website(s), and distribution center(s), certain of the Accused Products<sup>6</sup>, including Godox's LED1000II product line (hereinafter, collectively "LED1000")<sup>7</sup> which is exemplary and representative of the Accused Products and contains each element of and infringes<sup>8</sup> at least claim 1 of the '022 patent, which recites the following:

An apparatus for illuminating a subject for film, photography or video, the apparatus comprising:  
a frame having a front;  
a plurality of semiconductor light elements disposed on the front of the frame and configured to provide a continuous source of illumination, said semiconductor light elements having a color temperature suitable for image capture, at least one of said semiconductor light elements individually emitting light in a daylight color temperature range or a tungsten color temperature range; and  
a dimmer whereby an illumination intensity of said semiconductor light elements may be user adjusted;  
wherein said frame is adapted for being mounted to and readily disengaged from a stand.

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<sup>5</sup> See *supra* n.2.

<sup>6</sup> See Chart at ¶ 12, *infra*.

<sup>7</sup> See e.g., <https://mpex.com/godox-led1000d-ii-daylight-led-video-light.html> (visited May 13, 2020); <https://mpex.com/godox-led1000bi-ii-bi-color-led-video-light.html> (visited May 13, 2020).

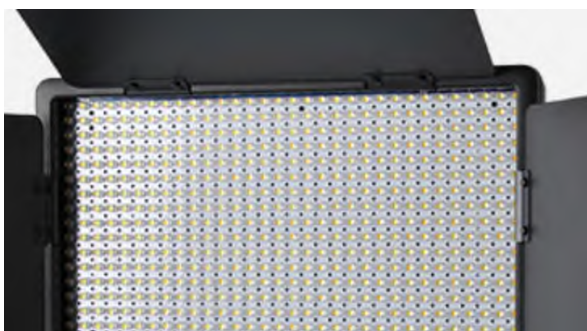
<sup>8</sup> See *supra* n.3.

21. As confirmed by at least the following images and cited references, the LED1000 is an apparatus meant for illuminating a subject for film, photography or video. Godox advertised/advertises the LED1000 on its website as being “excellent for product shooting, photojournalistic and videorecording, etc.”<sup>9</sup>

22. The LED1000 includes a frame having a front as shown in the following image:<sup>10,11</sup>



23. The LED1000 contains a plurality of semiconductor light elements disposed on the front of the frame and configured to provide a continuous source of illumination as shown in the following image:<sup>12</sup>



<sup>9</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED1000II.html](http://www.godox.com/EN/Products_Continuous_LED1000II.html) (last visited August 24, 2021).

<sup>10</sup> In *Litepanels v. Flolight, LLC*, the United States District Court for the Eastern District of Texas, Marshall Division, construed ‘frame’ as being a “supporting structure” and ‘front’ as being the “side from which light is emitted.” See *Litepanels, LTD, et al v. Flolight, LLC*, 2:20-cv-00344 at Dkt. 57.

<sup>11</sup> [http://www.godox.com/EN/InstructionManual/Godox\\_Catalog\\_31th\\_En\\_20210420.pdf](http://www.godox.com/EN/InstructionManual/Godox_Catalog_31th_En_20210420.pdf) (last visited August 24, 2021).

<sup>12</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED1000II.html](http://www.godox.com/EN/Products_Continuous_LED1000II.html) (last visited August 24, 2021).

24. The semiconductor light elements on the LED1000 have a color temperature suitable for image capture which Godox markets as providing “a wide spectrum, beautifully soft and even illumination for photography.”<sup>13</sup>

25. At least one of the semiconductor light elements on the LED1000 product emits light in a daylight color range or a tungsten color temperature range which Godox markets as available in a “white version” which has a daylight color temperature of “5600K +/-300k,” a “yellow version” which has a tungsten color temperature of “3300K +/-300k,” and a “changeable version” capable of producing a color temperature from “3300K to 5600K,” which represents the ability to produce in either the daylight or tungsten color temperature ranges.<sup>14 15 16</sup>

26. The LED1000 product contains a dimmer whereby an illumination intensity of said semiconductor light elements may be user adjusted. Godox markets the LED1000 on its website using the following image related to adjustment of brightness via a user adjusted knob and stating that “[y]ou are free to control the brightness [of the LED1000] from 100% to 0%...”:<sup>17</sup>



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<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED500\\_LED1000\\_Video\\_Light.html](http://www.godox.com/EN/Products_Continuous_LED500_LED1000_Video_Light.html) (last visited August 6, 2020).

<sup>17</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED1000II.html](http://www.godox.com/EN/Products_Continuous_LED1000II.html) (last visited August 24, 2021).



27. The LED1000 frame is adapted for being mounted and readily disengaged from a stand which Godox advertised/advertises on its website with images showing the LED1000 mounted on a stand, with adjustable knobs to allow the panel to be readily mounted to and removed from the stand, as follows:<sup>18</sup>



28. Defendants have never been licensed or otherwise authorized to practice the claims of the '022 patent.

29. As a direct and proximate cause of Defendants' infringement of the '022 patent, Plaintiff has been damaged in an amount yet to be determined.

**COUNT II - INFRINGEMENT OF THE '652 PATENT**

30. Plaintiff incorporates paragraphs 1 through 29 above by reference.

31. The '652 patent is entitled "Versatile Stand-Mounted Wide Area Lighting Apparatus" and issued January 18, 2008 to inventors Rudy Pohlert, Pat Grosswendt, Kevin Baxter, and Ken Fisher.

32. Litepanels owns all right, title, and interest to the '652 patent. A copy of the '652 patent is attached to this Complaint as Exhibit D.

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<sup>18</sup> *Id.*

33. Defendants have infringed at least claim 1 of the ‘652 patent in this District and throughout the United States by importing, using, selling, renting and/or offering for sale the Accused Products. Each of the Accused Products meet each and every limitation of at least claim 1 of the ‘652 patent. Defendants have infringed directly and/or under the doctrine of equivalents.

34. For example, Defendants previously marketed, offered for sale, and sold, as well as currently market, offer for sale, and sell<sup>19</sup>, through their retail location(s), website(s), and distribution center(s), the Accused Products, including the LED1000<sup>20</sup>, which is exemplary and representative of the Accused Products, contains each element of and infringes<sup>21</sup> at least claim 1 of the ‘652 patent, which recites the following:

A lighting system suitable to provide proper illumination for lighting of a subject in film or video, comprising:

a portable frame having a panel including a mounting surface;

a plurality of semiconductor light elements disposed on said mounting surface, said semiconductor light elements emitting light within a color temperature range suitable for image capture, at least one of said semiconductor light elements emitting light in a daylight or tungsten color temperature range; and

a focusing element for adjusting the focus and/or direction of the light emitted by said semiconductor light elements;

wherein said portable frame is adapted for being mounted to and readily disengaged from a stand.

35. As confirmed by at least the following images and cited references, the LED1000 is a lighting system suitable to provide proper illumination for lighting of a subject in film or video. Godox advertised/advertises the LED1000 on its website as being “excellent for product shooting, photojournalistic and videorecording, etc.”<sup>22</sup>

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<sup>19</sup> See *supra* n.2.

<sup>20</sup> See e.g., <https://mpex.com/godox-led1000d-ii-daylight-led-video-light.html> (visited May 13, 2020); <https://mpex.com/godox-led1000bi-ii-bi-color-led-video-light.html> (visited May 13, 2020).

<sup>21</sup> See *supra* n.3.

<sup>22</sup> [http://www.godox.com/EN/InstructionManual/Godox\\_Catalog\\_31th\\_En\\_20210420.pdf](http://www.godox.com/EN/InstructionManual/Godox_Catalog_31th_En_20210420.pdf) (last visited August 24, 2021).

36. The LED1000 has a portable frame<sup>23</sup> having a panel including a mounting surface. Godox markets the LED1000 on its website as “[d]esigned to be portable yet versatile,” further including images showing the LED1000’s portable frame having a panel including a mounting surface, as shown in the following image:<sup>24</sup>



37. The LED1000 contains a plurality of semiconductor light elements disposed on said mounting surface as shown in the image above.

38. The semiconductor light elements on the LED1000 emit light having a color temperature suitable for image capture. Godox markets the LED1000 as providing “a wide spectrum, beautifully soft and even illumination for photography.”<sup>25</sup>

39. At least one of the semiconductor light elements on the LED1000 product emits light in a daylight color range or a tungsten color temperature range. Godox markets the LED1000 on its website as available in a “white version” which has a daylight color temperature of “5600K +/-300k,”<sup>26</sup> a “yellow version” which has a tungsten color temperature of “3300K +/-300k,”<sup>27</sup> and a “changeable version” capable of producing a color temperature from “3300K to

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<sup>23</sup> See *supra* n.9.

<sup>24</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED1000II.html](http://www.godox.com/EN/Products_Continuous_LED1000II.html) (last visited August 24, 2021).

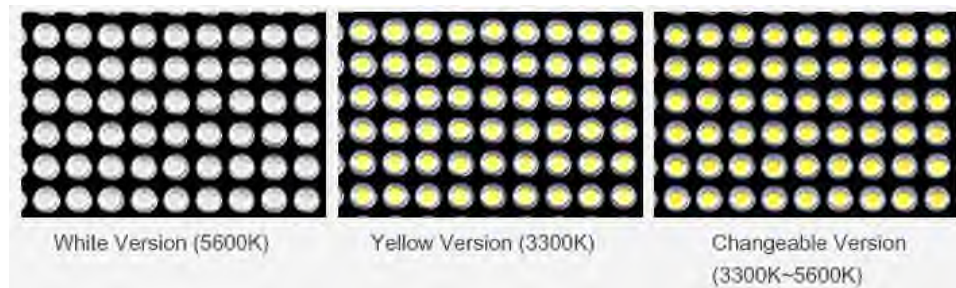
<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

5600K,” which represents the ability to produce in either the daylight or tungsten color temperature ranges.<sup>28</sup>

40. The LED1000 comprises a focusing element for adjusting the focus and/or direction of the light emitted by said semiconductor light elements. Each of the LED1000’s semiconductor light elements are LED bulbs with an integral lens cap which constitutes an optical focusing element for adjusting the focus and/or direction of the light emitted by said semiconductor light elements, as shown in the image below:<sup>29</sup>



41. The LED1000’s portable frame is adapted for being mounted to and readily disengaged from a stand. Godox advertised/advertises the LED1000 on its website using images to depict the LED1000’s portable frame mounted on a stand, with adjustable knobs to allow the portable frame to be readily disengaged from the stand, as shown in the image below:<sup>30</sup>



<sup>28</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED500\\_LED1000\\_Video\\_Light.html](http://www.godox.com/EN/Products_Continuous_LED500_LED1000_Video_Light.html) (last visited August 6, 2020).

<sup>29</sup> *Id.*

<sup>30</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED1000II.html](http://www.godox.com/EN/Products_Continuous_LED1000II.html) (last visited August 24, 2021).

42. Defendants have never been licensed or otherwise authorized to practice the claims of the '652 patent.

43. As a direct and proximate cause of Defendants' infringement of the '652 patent, Plaintiff has been damaged in an amount yet to be determined.

**COUNT III**  
**INFRINGEMENT OF THE '290 PATENT**

44. Plaintiff incorporates paragraphs 1 through 43 above by reference.

45. The '290 patent is entitled "Stand-Mounted Light Panel For Natural Illumination in Film, Television or Video" and issued March 31, 2009 to inventors Rudy Pohlert, Pat Grosswendt, Kevin Baxter, and Ken Fisher.

46. Litepanels owns all right, title, and interest to the '290 patent. A copy of the '290 patent is attached to this Complaint as Exhibit E.

47. Defendants have infringed at least claim 1 of the '290 patent in this District and throughout the United States by importing, using, selling, renting and/or offering for sale the Accused Products. Each of the Accused Products meet each and every limitation of at least claim 1 of the '290 patent. Defendants have infringed directly and/or under the doctrine of equivalents.

48. For example, Defendants previously marketed, offered for sale, and sold, as well as currently market, offer for sale, and sell<sup>31</sup>, through their retail location(s), website(s), and distribution center(s), the Accused Products, including the LED1000<sup>32</sup>, which is exemplary and representative of the Accused Products, contains each element of and infringes<sup>33</sup> at least claim 1 of the '290 patent, which recites the following:

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<sup>31</sup> See *supra* n.2.

<sup>32</sup> See *e.g.*, <https://mpex.com/godox-led1000d-ii-daylight-led-video-light.html> (visited May 13, 2020); <https://mpex.com/godox-led1000bi-ii-bi-color-led-video-light.html> (visited May 13, 2020).

<sup>33</sup> See *supra* n.3.

An apparatus for illuminating a subject for film, photography or video, the apparatus comprising:

a frame having a front;

a plurality of semiconductor light elements disposed on the front of the frame and configured to provide a continuous source of illumination, said semiconductor light elements having a color temperature suitable for image capture, at least one of said semiconductor light elements individually emitting light in a daylight color temperature range or a tungsten color temperature range; and

a dimmer whereby an illumination intensity of said semiconductor light elements may be user adjusted;

wherein said frame is adapted for being mounted to and readily disengaged from a stand and further comprises a stand adapter bracket configured to be mounted to and readily disengaged from said stand; and

wherein said stand adapter bracket comprises a yoke for mounting said frame, and wherein said frame is configured to swivel and/or tilt when mounted to said yoke.

49. As confirmed by at least the following images and cited references, the LED1000 is a lighting system suitable to provide proper illumination for lighting of a subject in film or video. Godox advertised/advertises the LED1000 on its website as being “excellent for product shooting, photojournalistic and videorecording, etc.”<sup>34</sup>

50. The LED1000 includes a frame having a front<sup>35</sup> as shown in the image below:<sup>36</sup>



<sup>34</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED1000II.html](http://www.godox.com/EN/Products_Continuous_LED1000II.html) (last visited August 24, 2021).

<sup>35</sup> See *supra* n.9.

<sup>36</sup> [http://www.godox.com/EN/InstructionManual/Godox\\_Catalog\\_31th\\_En\\_20210420.pdf](http://www.godox.com/EN/InstructionManual/Godox_Catalog_31th_En_20210420.pdf) (last visited August 24, 2021).

51. The LED1000 contains a plurality of semiconductor light elements disposed on the front of the frame and configured to provide a continuous source of illumination as shown in the following image:<sup>37</sup>



52. The semiconductor light elements on the LED1000 have a color temperature suitable for image capture. Godox markets the LED1000 on its website as providing “a wide spectrum, beautifully soft and even illumination for photography.”<sup>38</sup>

53. At least one of the semiconductor light elements on the LED1000 product emits light in a daylight color range or a tungsten color temperature range. Godox advertised/advertises the LED1000 as available in a “white version” which has a daylight color temperature of “5600K +/-300k,”<sup>39</sup> a “yellow version” which has a tungsten color temperature of “3300K +/-300k,”<sup>40</sup> and a “changeable version” capable of producing a color temperature from “3300K to 5600K,” which represents the ability to produce in either the daylight or tungsten color temperature ranges.<sup>41</sup>

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<sup>37</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED1000II.html](http://www.godox.com/EN/Products_Continuous_LED1000II.html) (last visited August 24, 2021).

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> *Id.*

<sup>41</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED500\\_LED1000\\_Video\\_Light.html](http://www.godox.com/EN/Products_Continuous_LED500_LED1000_Video_Light.html) (last visited August 6, 2020).

54. The LED1000 product contains a dimmer whereby an illumination intensity of said semiconductor light elements may be user adjusted. Godox markets the LED1000 on its website using an image related to adjustment of brightness via a user adjusted knob and advertised/advertises that “[y]ou are free to control the brightness [of the LED1000] from 100% to 0%....”:<sup>42</sup>



55. The LED1000 frame is adapted for being mounted and readily disengaged from a stand. Godox markets the LED1000 on its website as using images showing the LED1000 mounted on a stand, with adjustable knobs to allow the panel to be readily mounted to and removed from the stand, as follows:<sup>43</sup>



<sup>42</sup> [http://www.godox.com/EN/Products\\_Continuous\\_LED1000II.html](http://www.godox.com/EN/Products_Continuous_LED1000II.html) (last visited August 24, 2021).

<sup>43</sup> *Id.*



56. The LED1000 stand adapter mounts include a yoke for mounting the frame, wherein the frame can swivel or tilt when mounted on the yoke. Godox markets the LED1000 on its website, stating that “[t]hanks to the yoke, the light can be easily adjust the angle.” [sic]<sup>44</sup> Further, Godox advertised/advertises that the LED1000’s “[y]oke is compatible with most light stands and offers tightening knob for a secure fit.”<sup>45</sup> Godox advertised/advertises the LED1000 using images showing the LED1000 stand adapter mount with a yoke upon which the LED1000 frame is mounted, containing adjustable knobs to allow for swivel and tilt movement, as shown in the image above.

57. Defendants have never been licensed or otherwise authorized to practice the claims of the ‘290 patent.

58. As a direct and proximate cause of Defendants’ infringement of the ‘290 patent, Plaintiff has been damaged in an amount yet to be determined.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays that this Court enter judgment and provide relief as follows:

- A. That Defendants have infringed the ‘022, ‘652, and ‘290 patents;
- B. That the ‘022, ‘652, and ‘290 patents are valid and enforceable;
- C. That Defendants be ordered to account for and pay to Plaintiff the damages resulting from Defendants’ infringement of the ‘022, ‘652, and ‘290 patents together with interest and costs, and all other damages permitted by 35 U.S.C. § 284, including enhanced damages up to three times the amount of damages found or measured, but in any event no less than a reasonable royalty;

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<sup>44</sup> *Id.*

<sup>45</sup> *Id.*

- D. That this action be adjudicated an exceptional case and Plaintiff be awarded its attorneys' fees, expenses, and costs pursuant to 35 U.S.C. § 285; and
- E. That Plaintiff be awarded such other equitable or legal relief as this Court deems just and proper under the circumstances.

**JURY DEMAND**

Litepanels demands a jury trial on all issues so triable.

Respectfully submitted,

/s/ Aaron M. Jones  
Aaron M. Jones (0096386) (Trial Attorney)  
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*Counsel for Plaintiff*