

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
Case No.**

ALFA LLC, d/b/a EVERYLITE,  
registered under the Laws of Florida,

Plaintiff,

v.

GLOBE TO GREEN LIGHTING, LLC.,  
A New Jersey Limited Liability Company,  
And SIKAI CHEN, an individual,

Defendants.

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**VERIFIED COMPLAINT FOR PATENT INFRINGEMENT:  
INJUNCTIVE RELIEF SOUGHT**

Plaintiff, ALFA, LLC d/b/a/EVERYLITE (hereinafter referred to as “Plaintiff”, or “EVERYLITE”), by through undersigned counsel, sues Defendants GLOBE TO GREEN LIGHTING, LLC., and SIKAI CHEN, (collectively “GLOBE”), for acts of patent infringement, and alleges as follows:

**NATURE OF THE ACTION**

1. This is an action for patent infringement in connection with GLOBE’s making, importing, offering for sale and selling lighting devices that contain and comprise patented proprietary technology covered by a United States Patent duly owned and exclusively used by EVERYLITE. GLOBE then used the patented technology to manufacture knockoffs that have been widely advertised online, sold, offered for sale, and/or displayed and offered through important and relevant lighting industry trade shows throughout the United States. GLOBE's infringing conduct has damaged EVERYLITE and inflicted irreparable harm.

2. EVERYLITE seeks, *inter alia*, disgorgement of GLOBE's profits from the sale of infringing products, and injunctive relief.

### **JURISDICTION AND VENUE**

3. This Court has original jurisdiction over the claims for patent infringement under 28 U.S.C. §§ 1331 and 1338(a) in that said claims arise under the Patent Laws of the United States, 35 U.S.C. § 1 et seq.”

4. This Court has *in personam* jurisdiction over GLOBE pursuant to FLA. STAT. § 48.193, in that: (a) GLOBE is residing, operating, conducting, engaging or carrying on a business, in the State of Florida; (b) GLOBE has committed tortious acts within the State of Florida; and (c) GLOBE is engaged in substantial and not isolated activity within the State of Florida.

5. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because GLOBE and a substantial part of the events giving rise to the claim occurred in this District.

### **THE PARTIES**

6. EVERYLITE is a registered d/b/a in Florida, organized and existing under the laws of Florida, and has operated in, and sold goods in the United States, and specifically, in the Middle District of Florida.

7. Upon information and belief, GLOBE are residents of New Jersey, and a limited liability company organized and existing under the laws of the State of New Jersey, with its principal place of business located at 1829 Underwood Blvd, Unit 5, Delran Twp, NJ 08075.

8. Upon information and belief, Defendant CHEN owns GLOBE, and actively controls the activities of GLOBE and the acts complained of.

**EVERYLITE'S BUSINESS**

9. Well prior to the acts complained of, EVERYLITE has been involved in the business of manufacturing high quality lighting products, comprising patented and cutting-edge technology, and sold in a variety of markets.

10. EVERYLITE lighting products are uniquely designed and have been enormously successful in the market, and have met substantial success in the relevant market, and channels of trade.

11. EVERYLITE products are sold throughout the United States and are sold to businesses and directly to the public through “business-to business” dealer channels and through retail channels respectively.

12. As a result of the originality and high quality of its products, EVERYLITE has developed a reputation for excellence and innovation which has generated several million dollars in sales, and to many loyal customers.

**EVERYLITE'S PATENT**

**The ‘160 Patent**

13. On January 25, 2022, U.S. Patent No. 11,231,160 (the “‘160 Patent”), for an RGBW LED with integrated lens device was issued by the United States Patent and Trademark Office. A true and correct copy of the ‘160 Patent is attached as Composite Exhibit “A” hereto.

14. ALFA is the owner of the ‘160 Patent and ALFA has the exclusive right to use, make, sell, and offer an RGBW LED with integrated lens device with the patented technology.

15. The ‘160 Patent is in full force and effect as of the date of this Verified Complaint and all times relevant to the allegations herein.

16. The '160 Patent discloses a novel light device having a plurality of red, blue and green (RGB) LED's and a white (W) LED that are positioned within a lens housing. The '160 Patent provides the technological advancement necessary for utilizing the LEDs to provide selected illumination.

**COUNT I - INFRINGEMENT OF THE '160 PATENT**

17. EVERYLITE re-alleges and incorporates hereto by reference all preceding paragraphs of this Verified Complaint.

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

19. Defendants CHEN and GLOBE TO GREEN LIGHTING, LLC have directly infringed and continue to infringe claims 15 and 16 of the '160 Patent. With reference to exemplary claim 15 of the '160 Patent, Defendants have infringed and continue to directly infringe that claim by, among other things, manufacturing, using, offering for sale and/or selling lighting devices that are identical or virtually identical to the device claimed in the '160 Patent, and will continue to do so unless enjoined by this Court.

20. Independent Claim 15 of the 160' Patent recites "A light device." The full text of Claim 15 follows:

A light device, comprising: at least one RGB light emitting diode; at least one single-color light emitting diode; a circuit board that is in communication with each of the at least one RGB light emitting diode and the at least one single-color light emitting diode; a backer having a top surface, and a bottom surface; a lens having a top wall, a sidewall and an interior space; a plurality of domes extending outward from the top wall of the lens; and a refractor that is positioned along an inside portion of the top wall; wherein the circuit board is positioned along the top surface of the backer, wherein each of the at least one RGB light emitting diode and the at least one single-color light emitting diode are positioned

adjacent to the top wall of the lens, and wherein the backer is positioned within the interior space of the lens.

21. Defendants' devices are "light devices" and comprise all of the claim limitations set forth in claim 15 and, therefore, at least infringe claim 15 of the '160 Patent.

22. Defendants' devices comprise, among other things, "at least one RGB light emitting diode", "at least one single-color light emitting diode", "a circuit board that is in communication with each of the at least one RGB light emitting diode and the at least one single-color light emitting diode", "a backer having a top surface, and a bottom surface", "a lens having a top wall, a sidewall and an interior space", "a plurality of domes extending outward from the top wall of the lens", and "a refractor that is positioned along an inside portion of the top wall." The "circuit board" of Defendants devices' "is positioned along the top surface of the backer", "each of the at least one RGB light emitting diode and the at least one single-color light emitting diode are positioned adjacent to the top wall of the lens", and "the backer is positioned within the interior space of the lens."

23. Defendants' devices also comprise all of the claim limitations set forth in claim 16 of the '160 patent and therefore infringe on these claims as well.

24. The full text of Claim 16 follows:

The device of claim 15, wherein the at least one single-color light emitting diode is positioned within one of the plurality of domes and above the refractor.

25. Defendants' devices comprise, among other things, "at least one single-color light emitting diode is positioned within one of the plurality of domes and above the refractor."

26. By making, using, offering for sale, selling, and importing devices such as the "G2G Trico 2 RGBW" and the "G2G Trico L" devices, Defendants have injured EVERYLITE and are

liable to it for directly infringing one or more claims of the '160 Patent, including at least claims 15-16, pursuant to 35 U.S.C. §271(a).

27. In addition, through the use of a manufacturer, and through its dealer network, and clients, Defendants' have induced infringement of the '160 Patent by others and has committed acts of contributory infringement of the '160 Patent. These acts include designing, assembling and installing the "G2G Trico 2 RGBW" device, the "G2G Trico L" device and other devices in a manner that infringes the patented claims of the '160 Patent, and by providing instructions, and advertisements to customers to induce infringement.

28. Defendants' intended to induce patent infringement by its customers and had knowledge that the inducing acts would cause infringement or was willfully blind to the possibility that its inducing acts would cause infringement.

29. Defendants' infringement of the '160 Patent has been willful and with actual or constructive knowledge that EVERYLITE is the owner of a patent claiming the infringed technology.

30. EVERYLITE has sustained damages as a result of the infringing acts of Defendants.

31. EVERYLITE has suffered and will continue to suffer irreparable harm unless infringement of the '160 Patent is enjoined.

### **GLOBE'S ACTS OF INFRINGEMENT**

32. Defendants currently are making, offering for sale, selling, displaying, and promoting an infringing and competing product, and are showing the infringing product at notable lighting industry trade shows as soon as May 2022.

33. GLOBE has continued to make, have made, sell, and/or offer for sale, lighting devices that embody EVERYLITE's patented technology, and despite having actual knowledge of the claims of infringement.

34. GLOBE sells lighting devices that infringe EVERYLITE's '160 Patent. Attached as Exhibit B is a copy of some of GLOBE's advertisements and promotional information comprising the infringing designs, sold under the TRICO and G2G tradenames.

35. GLOBE imported, or caused to be imported, on its behalf and for its benefit, the infringing lighting devices into the United States.

36. GLOBE has offered for sale and sold the knock-off lighting devices throughout the United States, including within this District.

37. At all times, Defendant GLOBE has orchestrated all of the acts complained of and has participated in acts of infringement with full knowledge of Plaintiff's patent rights.

38. On information and belief, GLOBE have sold, offered for sale, made, or have had made infringing lighting devices throughout the United States with actual knowledge that they comprise technology embodied in the '160 Patent.

39. Defendants' lighting devices contain in many respects virtually identical copies of EVERYLITE's patented technology, and are doing so to gain an unfair advantage in the market by making and selling an inferior product at a reduced cost.

40. Clearly, Defendants acts, and their products, support allegations of patent infringement.

**COUNT I - INFRINGEMENT OF THE '160 PATENT**

41. EVERYLITE re-alleges and incorporates hereto by reference paragraphs 1-40 of this Verified Complaint as though fully set forth herein.

42. Defendants GLOBE and GLOBE have infringed and continue to infringe the '160 Patent. GLOBE has imported into the United States, made, sold and offered for sale lighting devices that are virtually identical to the design claimed in the '160 Patent, and will continue to do so unless enjoined by this Court.

43. In addition, through the use of a Chinese manufacture, and through its dealer network have induced infringement of the '160 Patent by others and has committed acts of contributory infringement of the '160 Patent.

44. Defendants' infringement of the '160 Patent has been willful and malicious and with actual or constructive knowledge that EVERYLITE is the owner of a patent claiming the infringed technology.

45. Plaintiff has sustained damages as a result of the infringing acts of Defendants.

46. Plaintiffs has suffered and will continue to suffer irreparable harm unless infringement of the '160 Patent is enjoined.

**WHEREFORE**, Plaintiff, EVERYLITE prays that the Court:

A. Enter a judgment that Defendants have infringed, induced infringement and contributed to the infringement of U.S. Patent No. 11,231,160;

B. Enter a judgment that have infringed, induced infringement and contributed to the infringement of U.S. Patent No. 11,231,160;

C. Order Defendants to pay damages under 35 U.S.C. §285 and §289 to adequately compensate Plaintiff for their acts of patent infringement, including an award of Defendants' profits from its infringement of U.S. Patent No. 11,231,160 together with pre- and post-judgment interest;



- D. Find that Defendants' patent infringement was willful and malicious and award treble damages to Plaintiff under 35 U.S.C. 284;
- E. Find this to be an exceptional case of patent infringement and award reasonable attorneys' fees to Plaintiff under 35 U.S.C. §285; and
- F. Award such other and further relief as the Court deems just and equitable

**VERIFICATION**

I have read the factual allegations contained in the foregoing Complaint and I declare under penalty of perjury under the law of the United States of America that these factual allegations are true and correct, and for those allegations that are based upon information and belief, I believe those to be true and correct.

Dated: May 2, 2022

By: \_\_\_\_\_  
Bruce Zhang

Respectfully submitted,

By: /s/ Louis R. Gigliotti/  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the forgoing was filed ECF and served via electronic mail on May 2, 2022.

By: /s/Louis R. Gigliotti  
Louis R. Gigliotti, Esq.