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11 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
12 **SOUTHERN DIVISION**

13 **BELAIR ELECTRONICS, INC.,**  
14 **Plaintiff,**  
15 **v.**  
16 **VRS DESIGN, INC AND DAMDA INC.,**  
17 **Defendants.**

**Case No. 8:23-cv-00108**  
**COMPLAINT FOR PATENT**  
**INFRINGEMENT**

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19 Plaintiff BelAir Electronics, Inc. (“BelAir” or “Plaintiff”) complains of Defendants VRS Design,  
20 Inc and Damda Inc. (collectively, “VRS” or “Defendants”) as follows, all upon Plaintiff’s best  
21 information and belief:

22 **NATURE OF LAWSUIT**

23 1. This is a claim for patent infringement arising under the patent laws of the United States,  
24 Title 35 of the United States Code.

25 **THE PARTIES**

26 2. Plaintiff BelAir Electronics, Inc. is an Illinois corporation with its principal place of  
27 business at 5723 Antler Lane, Westmont, Illinois 60559.

1 3. BelAir is the named assignee of, owns all right, title and interest in, and has standing to  
2 sue for infringement of United States Patent No. 7,194,291, entitled “Protective Mask of Mobile Phone,”  
3 which issued on March 20, 2007 (the “‘291 Patent”) (a true and correct copy is attached as Exhibit A);  
4 United States Patent No. 7,941,195, entitled “Protective Mask of Mobile Phone,” which issued on May  
5 10, 2011 (the “‘195 Patent”) (a true and correct copy is attached as Exhibit B); and United States Patent  
6 No. 10,097,676, entitled “Protective Mask of Mobile Phone,” which issued on October 9, 2018 (the  
7 “‘676 Patent”) (a true and correct copy is attached as Exhibit C) (collectively, the “Asserted Patents”).

8 4. BelAir has the exclusive right to license and enforce the Asserted Patents and to collect  
9 all damages for infringement. BelAir also has standing to sue for infringement of the Asserted Patents.

10 5. Upon information and belief, Defendant VRS Design, Inc is a domestic California  
11 corporation with a principal place of business at 4020 North Palm Street, Suite 206, Fullerton, California  
12 92835 and shipping from 4020 North Palm Street, Suite 207, Fullerton, California 92835.



18  
19 6. Upon information and belief, Defendant Damda Inc. is a domestic California corporation  
20 with a principal place of business at 4020 North Palm Street, Suite 207, Fullerton, California 92835.

21 7. In furtherance of Plaintiff’s review and analysis prior to filing this action, Plaintiff  
22 studied Defendants’ publicly-available product literature and, among other things, purchased an “iPhone  
23 12 Pro Max Case Damda QuickStand – Black Black” and a “Galaxy Z Fold 4 5G Case Terra Guard  
24 Modern – Mint” from Defendants’ website and Amazon storefront for assessment as representatives of  
25 the products identified in Exhibit D and Exhibit E.

26 8. Defendants primarily advertise and sell Accused Products at <https://vrsdesign.com>,  
27 related urls in the vrsdesign.com domain,  
28

1 <https://www.amazon.com/s?me=A39OFLCM1FUKXS&marketplaceID=ATVPDKIKX0DER>, related  
2 “VRS Design®” product pages accessed through Amazon’s website, numerous other online  
3 marketplaces, and any brick and mortar stores in the US.

4 9. Defendants offer for sale and sell the Accused Products (as further identified below) for  
5 mobile devices throughout the United States and this Judicial District.

#### 6 **JURISDICTION AND VENUE**

7 10. BelAir’s claims for patent infringement against Defendants arise under the patent laws of  
8 the United States including 35 U.S.C. §§ 271 and 281. Consequently, this Court has original and  
9 exclusive subject matter jurisdiction over this Complaint pursuant to 28 U.S.C. §§ 1331 and 1338(a).

10 11. Defendants own, operate, and conduct business in the state of California and directs  
11 advertisements at residents of California – which are covered by claims of the Asserted Patents – and  
12 throughout the United States including California and this judicial district.

13 12. VRS Design, Inc and Damda Inc. are registered California corporations, currently doing  
14 business in this judicial district, have purposefully availed themselves of the privilege of conducting  
15 business with residents of this judicial district, have purposefully reached out to residents of this judicial  
16 district, and have established sufficient minimum contacts with the State of California such that they  
17 should reasonably and fairly anticipate being haled into court in California.

18 13. Venue in this judicial district is proper under 28 U.S.C. § 1400(b) because VRS Design,  
19 Inc and Damda Inc. reside in this Judicial District.

#### 20 **THE ACCUSED PRODUCTS**

21 14. Defendants have infringed certain claims of the Asserted Patents through the  
22 manufacture, sale, offer for sale, advertisement, importation, shipment, distribution, and/or use of  
23 Defendants’ protective masks for mobile devices (herein referred to as the “Accused Products”).

24 15. As presently advised, the Accused Products include the following categories of protective  
25 masks for mobile devices (“Case Styles”): Crystal Bumper; Crystal Chrome Clear; Crystal Fit (Crystal  
26 Fit Label); Crystal Mixx Pro; Damda (Damda Crystal Fit, Damda Crystal Mixx, Damda Folder, Damda  
27 Glide, Damda Glide Hybrid, Damda Glide Pro, Damda Glide Shield, Damda Glide Shield Gradient,

1 Damda Glide Shield New, Damda Glide Shield Winter Edition, Damda High Pro Shield, Damda Shield,  
2 Damda Shield Gradient, Damda Single Fit, Damda Slate) (including Sand Stone, Groove and NASA  
3 Series); Genuine Leather (Genuine Leather Diary); Hard Drop (Hard Drop Active); Layered Dandy  
4 (Layered Dandy Deluxe); QuickStand (Damda QuickStand, Damda QuickStand Pro, MagStand Pro,  
5 Quick Stand Active, Quick Stand Active S, QuickStand Modern, Quick Stand Modern Pro, Quick Stand  
6 Pro, Quick Strand Modern, QuickStand Active, Quickstand Active Multi Clip, QuickStand Pro,  
7 QuickStand Pro Clear, QuickStand Pro for MagSafe) (including Sand Stone Series); Saffiano Diary; and  
8 Terra Guard (Terra Guard Active, Terra Guard Active Multi Clip, Terra Guard Active Pro, Terra Guard  
9 Crystal, Terra Guard Modern, Terra Guard Multi Clip, Terra Guard S, Terra Guard Ultimate, Terra  
10 Guard Ultimate Go, Terra Guard Ultimate Go S). (See Exhibit D and Exhibit E, <https://vrsdesign.com/>,  
11 <https://vrsdesign.com/collections/iphone>, <https://vrsdesign.com/collections/google-pixel-7-series>,  
12 <https://vrsdesign.com/collections/pixel-6-pro>, and <https://vrsdesign.com/collections/samsung> and related  
13 urls in the vrsdesign.com domain and  
14 <https://www.amazon.com/s?me=A39OFLCM1FUKXS&marketplaceID=ATVPDKIKX0DER> and  
15 related “VRS Design®” product pages accessed through Amazon’s website).

16 16. As presently advised, the Accused Products include Defendants’ cases for at least the  
17 following mobile devices: Apple iPhone 14 Pro Max; Apple iPhone 14 Pro; Apple iPhone 14 Plus;  
18 Apple iPhone 14; Apple iPhone 13 Pro Max; Apple iPhone 13 Pro; Apple iPhone 13; Apple iPhone 13  
19 Mini; Apple iPhone 12 Pro Max; Apple iPhone 12 Pro; Apple iPhone 12; Apple iPhone 12 Mini; Apple  
20 iPhone 11 Pro Max; Apple iPhone 11 Pro; Apple iPhone 11; Apple iPhone XS Max; Apple iPhone XS;  
21 Apple iPhone X; Apple iPhone XR; Apple iPhone 8 Plus; Apple iPhone 7 Plus; Apple iPhone 8; Apple  
22 iPhone 7; Apple iPhone SE 3 (2022); Apple iPhone SE 2 (2020); Apple iPad 9.7; Google Pixel 7 Pro;  
23 Google Pixel 7; Google Pixel 6 Pro; Google Pixel 6; Samsung Galaxy Z Fold 4; Samsung Galaxy Z Fold  
24 4 5G; Samsung Galaxy Z Fold 3; Samsung Galaxy Z Fold 3 5G; Samsung Galaxy Z Fold 2; Samsung  
25 Galaxy Z Flip 4; Samsung Galaxy Z Flip 3; Samsung Galaxy Z Flip; Samsung Galaxy S22 Ultra;  
26 Samsung Galaxy S22 Plus; Samsung Galaxy S22; Samsung Galaxy S21 FE; Samsung Galaxy S21 Ultra;  
27 Samsung Galaxy S21 Plus; Samsung Galaxy S21; Samsung Galaxy S20 Ultra; Samsung Galaxy S20  
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1 Plus; Samsung Galaxy S20; Samsung Galaxy S9 Plus; Samsung Galaxy S9; Samsung Galaxy S8 Plus;  
2 Samsung Galaxy S8; Samsung Galaxy S7 Edge; Samsung Galaxy Note 20 Ultra; Samsung Galaxy Note  
3 20; Samsung Galaxy Note 10 Plus; Samsung Galaxy Note 10; Samsung Galaxy Note 9; Samsung  
4 Galaxy Note 8; Samsung Galaxy Note 5; Samsung Galaxy A72; and Samsung Galaxy A52. (See Exhibit  
5 D and Exhibit E, <https://vrsdesign.com/>, <https://vrsdesign.com/collections/iphone>,  
6 <https://vrsdesign.com/collections/google-pixel-7-series>, <https://vrsdesign.com/collections/pixel-6-pro>,  
7 and <https://vrsdesign.com/collections/samsung> and related urls in the vrsdesign.com domain and  
8 <https://www.amazon.com/s?me=A39OFLCM1FUKXS&marketplaceID=ATVPDKIKX0DER> and  
9 related “VRS Design®” product pages accessed through Amazon’s website).

10 17. Defendants’ Accused Products also include a smaller subset of protective masks for  
11 mobile devices consisting of two portion cases (herein referred to as the “Two Portion Accused  
12 Products”). See Exhibit E for a detailed list, exemplary photos, and product page links to the Two  
13 Portion Accused Products. For avoidance of doubt, the Two Portion Accused Products in Exhibit E are a  
14 smaller subset of the Accused Products in Exhibit D and are included in and a part of the Accused  
15 Products. All Defendants’ Accused Products are alleged to infringe at least independent Claim 9 of the  
16 ‘195 Patent and independent Claims 1, 5, 8, and 9 of the ‘676 Patent. In addition to these claims,  
17 Defendants’ Two Portion Accused Products are alleged to additionally infringe at least independent  
18 Claims 1, 6, and 9 of the ‘291 Patent and independent Claims 1 and 6 of the ‘195 Patent.

19 18. The Accused Products, as illustrated below, are those protective masks that are capable of  
20 being coupled to a portion of a mobile device so that the mobile device will not fall out of the protective  
21 mask. The Accused Products are those protective masks that comprise a flange(s) or retainer(s) (as  
22 recited in the asserted claims, *infra*). The Accused Products also may use flange(s) or retainer(s) in  
23 conjunction with substantial surface to surface contact by the inner surface of the protective mask which  
24 conforms to the contour of the outer surface of the mobile device, working together to provide non-  
25 permanent, temporary protection to the mobile device. While not required by all asserted claims, the  
26 Accused Products are protective masks that include openings to allow access to the interface as well as  
27 inputs and outputs, as well as protective masks that have patterns, nameplates, type, text, or graphic  
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1 elements. See Exhibit D and Exhibit E for exemplary photos for all categories of Defendants' case  
2 styles. Below are pictures of representative Accused Products.





25 iPhone 12 Pro Max Case Damda QuickStand Case: [https://vrsdesign.com/products/iphone-12-pro-max-](https://vrsdesign.com/products/iphone-12-pro-max-case-damda-quickstand)  
26 [https://www.amazon.com/VRS-Design-QuickStand-Compatible-](https://www.amazon.com/VRS-Design-QuickStand-Compatible-iPhone/dp/B08KSLC51J/)  
27 [iPhone/dp/B08KSLC51J/](https://www.amazon.com/VRS-Design-QuickStand-Compatible-iPhone/dp/B08KSLC51J/) (See Exhibit D and pictures of representative products).

28 COMPLAINT FOR PATENT INFRINGEMENT



20 Galaxy Z Flip 3 Case QuickStand Active Multi Clip Case: [https://vrsdesign.com/collections/galaxy-z-](https://vrsdesign.com/collections/galaxy-z-flip-3/products/galaxy-z-flip-3-case-quickstand-active-multi-clip)  
21 [https://www.amazon.com/VRS-](https://www.amazon.com/VRS-Design-QuickStand-Kickstand-Compatible/dp/B06XB82P7F)  
22 [Design-QuickStand-Kickstand-Compatible/dp/B06XB82P7F](https://www.amazon.com/VRS-Design-QuickStand-Kickstand-Compatible/dp/B06XB82P7F) (See Exhibit D and Exhibit E).





10 iPhone 12 Pro Max Case Damda Glide Pro NASA Case: [https://vrsdesign.com/collections/nasa-](https://vrsdesign.com/collections/nasa-collection/products/iphone-12-pro-max-case-damda-glide-pro-nasa)  
11 [collection/products/iphone-12-pro-max-case-damda-glide-pro-nasa](https://vrsdesign.com/collections/nasa-collection/products/iphone-12-pro-max-case-damda-glide-pro-nasa) (See Exhibit D).





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14 Galaxy Z Fold 4 5G Case Terra Guard Modern Case: [https://vrsdesign.com/products/galaxy-z-fold-4-](https://vrsdesign.com/products/galaxy-z-fold-4-5g-case-terra-guard-modern)  
15 [5g-case-terra-guard-modern](https://vrsdesign.com/products/galaxy-z-fold-4-5g-case-terra-guard-modern) and  
16 <https://www.amazon.com/dp/B0B6LDVVTX?smid=A39OFLCM1FUKXS> (See Exhibit D and Exhibit  
17 E).

18 19. The Accused Products subject to this Complaint include all substantively similar products  
19 and any predecessor and/or successor versions that satisfy each limitation of, and therefore infringe, any  
20 asserted claim of the Asserted Patents whether sold directly or via other online marketplaces or brick  
21 and mortar retail stores.

22 20. After adequate discovery, BelAir may seek leave to amend this Complaint to include  
23 additional details of infringement, if any, by other products hereafter discovered to infringe the Asserted  
24 Patents.

25 **COUNT I: INFRINGEMENT OF UNITED STATES PATENT NO. 7,194,291**

26 21. Plaintiff BelAir realleges and incorporates by reference paragraphs 1 through 20,  
27 inclusive, as though fully set forth herein.

1 22. Defendants directly infringe at least independent Claims 1, 6, and 9 of the '291 Patent.

2 **CLAIM 1**

3 23. Two Portion Accused Products, as manufactured, sold, offered for sale, advertised,  
4 imported, shipped, distributed, and/or used by Defendants, comprise a protective mask adapted to be  
5 coupled to an exterior housing of a mobile phone having internal components including circuitry and a  
6 battery, which are covered by the exterior housing, in accordance with the limitations of Claim 1 of the  
7 '291 Patent.

8 24. Specifically, the Two Portion Accused Products, comprise:

- 9 a. first mask portion, molded to conform to the shape of a first portion of the exterior  
10 housing of the mobile phone, the first mask portion having flanges to couple the  
11 first mask portion to the exterior housing of the mobile phone to retain the first  
12 mask portion to the first portion of the exterior housing so that the first mask  
13 portion covers the first portion of the exterior housing of the mobile phone; and;  
14 b. a second mask portion, molded to conform to the shape of a second portion of the  
15 exterior housing of the mobile phone, the second mask portion adapted to be  
16 coupled to the mobile phone to retain the second mask portion to the second  
17 portion of the exterior housing so that the second mask portion covers the second  
18 portion of the exterior housing of the mobile phone;  
19 c. wherein said first and second mask portions are retained to the exterior housing of  
20 the mobile phone.

21 25. As presently advised, one or more Two Portion Accused Products also likely satisfy the  
22 limitations of, and infringe, dependent Claims 2, 3, 4, and 5 of the '291 Patent.

23 **CLAIM 6**

24 26. Two Portion Accused Products, as manufactured, sold, offered for sale, advertised,  
25 imported, shipped, distributed, and/or used by Defendants, comprise a protective mask adapted to be  
26 coupled to an exterior housing of a mobile phone, the mobile phone having internal components  
27 including circuitry and a battery, which are covered by the exterior housing, in accordance with the  
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1 limitations of Claim 6 of the '291 Patent.

2 27. Specifically, the Two Portion Accused Products comprise:

- 3 a. a[] first mask portion, molded to conform to the shape of a first portion of the  
4 exterior housing of the mobile phone, the first mask portion having flanges to  
5 couple the first mask portion to the exterior housing of the mobile phone to retain  
6 the first mask portion to the first portion of the exterior housing so that the first  
7 mask portion covers the first portion of the exterior housing of the mobile phone;  
8 b. said first mask portion including an opening that is associated with an opening in  
9 the exterior housing to permit access to a feature of the mobile phone; and  
10 c. a second mask portion, molded to conform to the shape of a second portion of the  
11 exterior housing of the mobile phone, the second mask portion adapted to be  
12 coupled to the mobile phone to retain the second mask portion to the second  
13 portion of the exterior housing so that the second mask portion covers the second  
14 portion of the exterior housing of the mobile phone;  
15 d. wherein said first and second mask portions are retained to the exterior housing of  
16 the mobile phone.

17 28. As presently advised, one or more Two Portion Accused Products also likely satisfy the  
18 limitations of, and infringe, dependent Claims 7 and 8 of the '291 Patent.

19 **CLAIM 9**

20 29. Two Portion Accused Products, as manufactured, sold, offered for sale, advertised,  
21 imported, shipped, distributed, and/or used by Defendants, comprise a protective mask adapted to be  
22 coupled to an exterior housing of a mobile phone, the mobile phone having internal components  
23 including circuitry and a battery, which are covered by the exterior housing, in accordance with the  
24 limitations of Claim 9 of the '291 Patent.

25 30. Specifically, the Two Portion Accused Products comprise:

- 26 a. a[] first mask portion, molded to conform to the shape of a first portion of the  
27 exterior housing of the mobile phone, the first mask portion having a flange to  
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1 couple the first mask portion to the exterior housing of the mobile phone to retain  
2 the first mask portion to the first portion of the exterior housing so that the first  
3 mask portion covers the first portion of the exterior housing of the mobile phone;

4 b. the first mask portion including an opening that is associated with an opening in  
5 the exterior housing to permit access to a feature of the mobile phone;

6 c. a second mask portion, molded to conform to the shape of a second portion of the  
7 exterior housing of the mobile phone, the second mask portion adapted to be  
8 coupled to the housing of the mobile phone to retain the second mask portion to  
9 the second portion of the exterior housing so that the second mask portion covers  
10 the second portion of the exterior housing of the mobile phone; and

11 d. the second mask portion includes an opening that is associated with an opening in  
12 the exterior housing to permit access to a feature of the mobile phone.

13 31. As presently advised, one or more Two Portion Accused Products also likely satisfy the  
14 limitations of, and infringe, dependent Claim 10 of the '291 Patent.

15 32. To the extent required by law, BelAir has complied with the provisions of 35 U.S.C. §  
16 287.

17 33. Defendants had notice of the '291 Patent and the likelihood of infringement thereof at  
18 least as early as September 1, 2022, pursuant to email correspondence from BelAir to Defendants via  
19 their President and CEO, Young Suk (Tony) Chung. A follow up email was sent on September 21, 2022.  
20 Defendants did not respond to either the September 1 or September 21, 2022, communications, leaving  
21 BelAir no choice but to file this litigation in order to protect its intellectual property rights.

22 34. Defendants' direct infringement as described above, either literally or under the doctrine  
23 of equivalents, has injured BelAir and BelAir is entitled to recover damages adequate to compensate it  
24 for such infringement, but in no event less than a reasonable royalty.

25 **COUNT II: INFRINGEMENT OF UNITED STATES PATENT NO. 7,941,195**

26 35. Plaintiff BelAir realleges and incorporates by reference paragraphs 1 through 20,  
27 inclusive, as though fully set forth herein.

1 36. Defendants directly infringe at least independent Claims 1, 6, and 9 of the ‘195 Patent.

2 **CLAIM 1**

3 37. Two Portion Accused Products, as manufactured, sold, offered for sale, advertised,  
4 imported, shipped, distributed, and/or used by Defendants, comprise a protective mask adapted to be  
5 coupled to an exterior housing of a mobile phone having internal components including circuitry and a  
6 battery, which are covered by the exterior housing, in accordance with the limitations of Claim 1 of the  
7 ‘195 Patent.

8 38. Specifically, the Two Portion Accused Products comprise:

- 9 a. a first mask portion, molded to conform to the shape of a first portion of the  
10 exterior housing of the mobile phone, the first mask portion adapted to be coupled  
11 to the mobile phone to retain the first mask portion to the first portion of the  
12 exterior housing so that the first mask portion covers the first portion of the  
13 exterior housing of the mobile phone; and  
14 b. a second mask portion, molded to conform to the shape of a second portion of the  
15 exterior housing of the mobile phone, the second mask portion adapted to be  
16 coupled to the mobile phone to retain the second mask portion to the second  
17 portion of the exterior housing so that the second mask portion covers the second  
18 portion of the exterior housing of the mobile phone;  
19 c. wherein said first and second mask portions are retained to the exterior housing of  
20 the mobile phone.

21 39. As presently advised, one or more Two Portion Accused Products also likely satisfy the  
22 limitations of, and infringe, dependent Claims 2, 3, 4, and 5 of the ‘195 Patent.

23 **CLAIM 6**

24 40. Two Portion Accused Products, as manufactured, sold, offered for sale, advertised,  
25 imported, shipped, distributed, and/or used by Defendants, comprise a protective mask adapted to be  
26 coupled to an exterior housing of a mobile phone having internal components including circuitry and a  
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1 battery, which are covered by the exterior housing, in accordance with the limitations of Claim 6 of the  
2 '195 Patent.

3 41. Specifically, the Two Portion Accused Products comprise:

- 4 a. a first mask portion, molded to conform to the shape of a first portion of the  
5 exterior housing of the mobile phone, the first mask portion is adapted to be  
6 coupled to the mobile phone to retain the first mask portion to the first portion of  
7 the exterior housing so that the first mask portion covers the first portion of the  
8 exterior housing of the mobile phone;
- 9 b. said first mask portion including an opening that is associated with an opening in  
10 the exterior housing to permit access to a feature of the mobile phone; and
- 11 c. a second mask portion, molded to conform to the shape of a second portion of the  
12 exterior housing of the mobile phone, the second mask portion adapted to be  
13 coupled to the mobile phone to retain the second mask portion to the second  
14 portion of the exterior housing so that the second mask portion covers the second  
15 portion of the exterior housing of the mobile phone;
- 16 d. wherein said first and second mask portions are retained to the exterior housing of  
17 the mobile phone.

18 42. As presently advised, one or more Two Portion Accused Products also likely satisfy the  
19 limitations of, and infringe, dependent Claims 7 and 8 of the '195 Patent.

20 **CLAIM 9**

21 43. All Accused Products, as manufactured, sold, offered for sale, advertised, imported,  
22 shipped, distributed, and/or used by Defendants, comprise a protective mask adapted to be coupled to an  
23 exterior housing of a mobile phone having internal components including circuitry and a battery, which  
24 are covered by the exterior housing, in accordance with the limitations of Claim 9 of the '195 Patent.

25 44. Specifically, all Accused Products comprise:

- 26 a. a first mask portion, molded to conform to the shape of a first portion of the  
27 exterior housing of the mobile phone; and

1           b.       the first mask portion having flanges to allow the first mask portion to be coupled  
2                   to the mobile phone to retain the first mask portion to the first portion of the  
3                   exterior housing so that the first mask portion covers the first portion of the  
4                   exterior housing of the mobile phone.

5           45.       As presently advised, one or more Two Portion Accused Products and also likely satisfy  
6 the limitations of, and infringe, dependent Claims 10, 11, and 12 of the ‘195 Patent.

7           46.       To the extent required by law, BelAir has complied with the provisions of 35 U.S.C. §  
8 287.

9           47.       Defendants had notice of the ‘291 Patent and the likelihood of infringement thereof at  
10 least as early as September 1, 2022, pursuant to email correspondence from BelAir to Defendants via  
11 their President and CEO, Young Suk (Tony) Chung. A follow up email was sent on September 21, 2022.  
12 Defendants did not respond to either the September 1 or September 21, 2022, communications, leaving  
13 BelAir no choice but to file this litigation in order to protect its intellectual property rights.

14           48.       Defendants’ direct infringement as described above, either literally or under the doctrine  
15 of equivalents, has injured BelAir and BelAir is entitled to recover damages adequate to compensate it  
16 for such infringement, but in no event less than a reasonable royalty.

17                   **COUNT III: INFRINGEMENT OF UNITED STATES PATENT NO. 10,097,676**

18           49.       Plaintiff BelAir realleges and incorporates by reference paragraphs 1 through 20,  
19 inclusive, as though fully set forth herein.

20           50.       Defendants directly infringe at least independent Claims 1, 5, 8, and 9 of the ‘676 Patent.

21                   **CLAIM 1**

22           51.       All Accused Products, as manufactured, sold, offered for sale, advertised, imported,  
23 shipped, distributed, and/or used by Defendants, comprise a protective mask molded for frictional  
24 retention to an exterior housing of a mobile phone having user input and output interfaces, and internal  
25 components including circuitry and a battery, wherein the exterior housing completely encloses the  
26 circuitry and the battery when the mobile phone is fully assembled and ready for use, the exterior



1 housing having an exterior shape formed by a back surface, and at least portions of opposed side  
2 surfaces, in accordance with the limitations of Claim 1 of the '676 Patent.

3 52. Specifically, all Accused Products comprise:

- 4 a. an integrally-formed mask body molded and contoured to conform and  
5 frictionally-fit tightly against the exterior shape of the exterior housing;
- 6 b. an inner surface of the integrally-formed mask body defining an interior space of  
7 the integrally-formed mask body and conforming to and in substantially  
8 continuous surface-to-surface contact with the exterior shape of the exterior  
9 housing, with no substantial space between the inner surface of the integrally-  
10 formed mask body and the exterior shape of the exterior housing;
- 11 c. at least one opening defined by the integrally-formed mask body permitting user  
12 access to at least the user input and output interfaces; and
- 13 d. at least one retainer having an extension protruding laterally inward from the  
14 integrally-formed mask body and toward and into the integrally-formed mask  
15 body interior space, wherein the at least one retainer is retained to the exterior  
16 housing at an exterior housing edge when the mask is coupled to the mobile  
17 communication device, the at least one retainer participating in retaining the  
18 integrally-formed mask body to the mobile communication device.

19 53. As presently advised, one or more Accused Products also likely satisfy the limitations of,  
20 and infringe, dependent Claims 2, 3, and 4 of the '676 Patent.

21 **CLAIM 5**

22 54. All Accused Products, as manufactured, sold, offered for sale, advertised, imported,  
23 shipped, distributed, and/or used by Defendants, comprise a protective mask molded for frictional  
24 retention to an exterior housing of, and adapted to be coupled to, a mobile communication device having  
25 internal components including circuitry and a battery, wherein the exterior housing completely encloses  
26 the circuitry and battery when the mobile communication device is fully assembled and ready for use,  
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1 and wherein the exterior housing has an exterior shape including a back face and at least portions of  
2 opposed side surfaces, in accordance with the limitations of Claim 5 of the '676 Patent.

3 55. Specifically, all Accused Products comprise:

- 4 e. an integrally-formed mask body molded and contoured to conform and  
5 frictionally fit to the exterior shape of the exterior housing;
- 6 f. an inner surface of the integrally-formed mask body defining an interior space of  
7 the integrally-formed mask body and conforming to and in substantially  
8 continuous surface-to-surface contact with the exterior shape of the exterior  
9 housing in overlying and protecting relationship, without a substantial gap  
10 between the inner surface of the integrally- formed mask body and the exterior  
11 shape of the exterior housing, the integrally-formed mask body defining an  
12 opening enabling the mask to be placed over the exterior shape in overlying and  
13 protecting relationship; and;
- 14 g. at least one retainer having an extension protruding laterally inward from the  
15 integrally-formed mask body and toward and into the integrally-formed mask  
16 body interior space, wherein the at least one retainer is retained to the exterior  
17 housing at an exterior housing edge when the mask is coupled to the mobile  
18 communication device, the at least one retainer participating in retaining the  
19 integrally-formed mask body to the mobile communication device.

20 56. As presently advised, one or more Accused Products also likely satisfy the limitations of,  
21 and infringe, dependent Claims 6 and 7 of the '676 Patent.

22 **CLAIM 8**

23 57. All Accused Products, as manufactured, sold, offered for sale, advertised, imported,  
24 shipped, distributed, and/or used by Defendants, comprise a mask for attachment to a hand-held mobile  
25 phone, the mobile phone having user input and output interfaces, internal components including  
26 circuitry and a battery, and an exterior housing completely enclosing the circuitry and battery when the  
27 mobile phone is fully assembled and ready for use, the exterior housing including a first face, a second  
28

1 face and opposed side surfaces there between, in accordance with the limitations of Claim 8 of the '676  
2 Patent.

3 58. Specifically, all Accused Products comprise:

- 4 h. an integrally-formed mask body molded to conform to a shape of the exterior  
5 housing;
- 6 i. inner and outer surfaces, the surfaces defining at least one opening in the  
7 integrally-formed mask body providing access to at least one of the user input and  
8 output interfaces, the integrally-formed mask body being configured such that,  
9 when the mask is attached to the mobile phone, the integrally-formed mask body  
10 is coextensive with, contours to and overlies the opposed side surfaces, with  
11 substantially no space between the mask body and the opposed side surfaces; and
- 12 j. at least one retainer having an extension protruding laterally inward from the  
13 integrally-formed mask body and toward and into the integrally-formed mask  
14 body interior space, wherein the at least one retainer is retained to the exterior  
15 housing at an exterior housing edge when the mask is coupled to the mobile  
16 communication device, the at least one retainer participating in retaining the  
17 integrally-formed mask body to the mobile communication device.

18 **CLAIM 9**

19 59. All Accused Products, as manufactured, sold, offered for sale, advertised, imported,  
20 shipped, distributed, and/or used by Defendants, comprise a protective mask molded for frictional  
21 retention to an exterior housing of a fully assembled mobile communication device having user input  
22 and output interfaces, the mobile communication device further having internal components including  
23 circuitry and a battery completely enclosed by the exterior housing, and the exterior housing having an  
24 exterior shape formed by a back surface and at least portions of opposed side surfaces, in accordance  
25 with the limitations of Claim 9 of the '676 Patent.

26 60. Specifically, all Accused Products comprise:  
27  
28

1 k. an inner surface closely conforming to the exterior shape of the exterior housing  
2 and in substantially continuous surface-to-surface contact with the exterior shape  
3 of the exterior housing, with substantially no space between the inner surface of  
4 the protective mask and the exterior shape when the protective mask is retained to  
5 the exterior housing, the protective mask being molded, integrally formed,  
6 contoured and sized to fit tightly against the exterior shape of the exterior  
7 housing, thereby providing retention of the protective mask to the exterior  
8 housing;

9 l. at least one opening defined by the protective mask permitting user access to at  
10 least the user input and output interfaces; and

11 m. at least one retainer having an extension protruding laterally inward from the  
12 integrally-formed mask body and toward and into the integrally-formed mask  
13 body interior space, wherein the at least one retainer is retained to the exterior  
14 housing at an exterior housing edge when the mask is coupled to the mobile  
15 communication device, the at least one retainer participating in retaining the  
16 integrally-formed mask body to the mobile communication device.

17 61. As presently advised, one or more Accused Products also likely satisfy the limitations of,  
18 and infringe, dependent Claims 10, 11, and 12 of the '676 Patent.

19 62. To the extent required by law, BelAir has complied with the provisions of 35 U.S.C. §  
20 287.

21 63. Defendants had notice of the '676 Patent and the likelihood of infringement thereof at  
22 least as early as September 1, 2022, pursuant to email correspondence from BelAir to Defendants via  
23 their President and CEO, Young Suk (Tony) Chung. A follow up email was sent on September 21, 2022.  
24 Defendants did not respond to either the September 1 or September 21, 2022, communications, leaving  
25 BelAir no choice but to file this litigation in order to protect its intellectual property rights.

1 64. Defendants’ direct infringement as described above, either literally or under the doctrine  
2 of equivalents, has injured BelAir and BelAir is entitled to recover damages adequate to compensate it  
3 for such infringement, but in no event less than a reasonable royalty.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff BelAir Electronics, Inc. respectfully requests this Court to enter  
6 judgment against Defendants VRS Design, Inc and Damda Inc. – and against each of their subsidiaries,  
7 successors, parents, affiliates, officers, directors, agents, servants, employees, and all persons in active  
8 concert or participation with them – granting the following relief:

9 A. The entry of judgment in favor of Plaintiff and against Defendants;

10 B. An award of damages against Defendants adequate to compensate Plaintiff for the  
11 infringement that occurred, but in no event less than a reasonable royalty as permitted by 35 U.S.C. §  
12 284, together with prejudgment interest from the date infringement began; and

13 C. Such other relief to which Plaintiff is entitled under the law and any other and further  
14 relief that this Court or a jury may deem just and proper.

15 **JURY DEMAND**

16 Plaintiff demands a trial by jury on all issues presented in this Complaint.

17  
18 Dated: January 18, 2023

Respectfully submitted,

19 /s/ Marc Libarle

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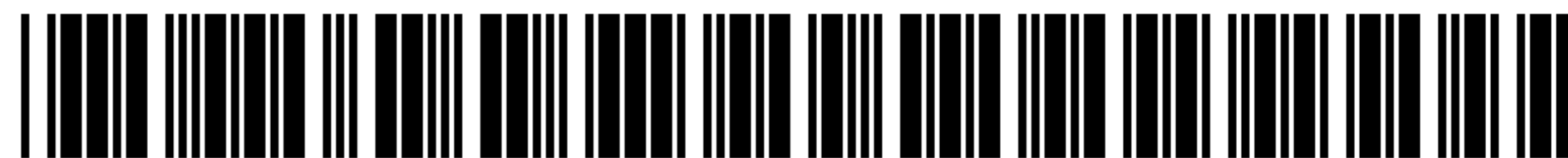
25 *Attorneys for Plaintiff, BelAir Electronics, Inc.*

# **EXHIBIT A**

**TO**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**United States Patent No.  
7,194,291**



US007194291B2

(12) **United States Patent**  
**Peng**

(10) **Patent No.:** **US 7,194,291 B2**  
(45) **Date of Patent:** **Mar. 20, 2007**

(54) **PROTECTIVE MASK OF MOBILE PHONE**

(75) Inventor: **Kuan-Lin Peng**, Taipei (TW)

(73) Assignee: **Gregory Kim**, Westmont, IL (US)

(\*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 508 days.

(21) Appl. No.: **09/888,488**

(22) Filed: **Jun. 26, 2001**

(65) **Prior Publication Data**  
US 2002/0197965 A1 Dec. 26, 2002

(51) **Int. Cl.**  
*H04B 1/38* (2006.01)  
*H04M 1/00* (2006.01)

(52) **U.S. Cl.** ..... **455/575.8**; 455/90.3; 455/575.1; 379/433.11; 379/451

(58) **Field of Classification Search** ..... 379/433.01, 379/433.11, 451; 455/90.1, 90.3, 550.1, 455/575.1, 575.8, 575.9  
See application file for complete search history.

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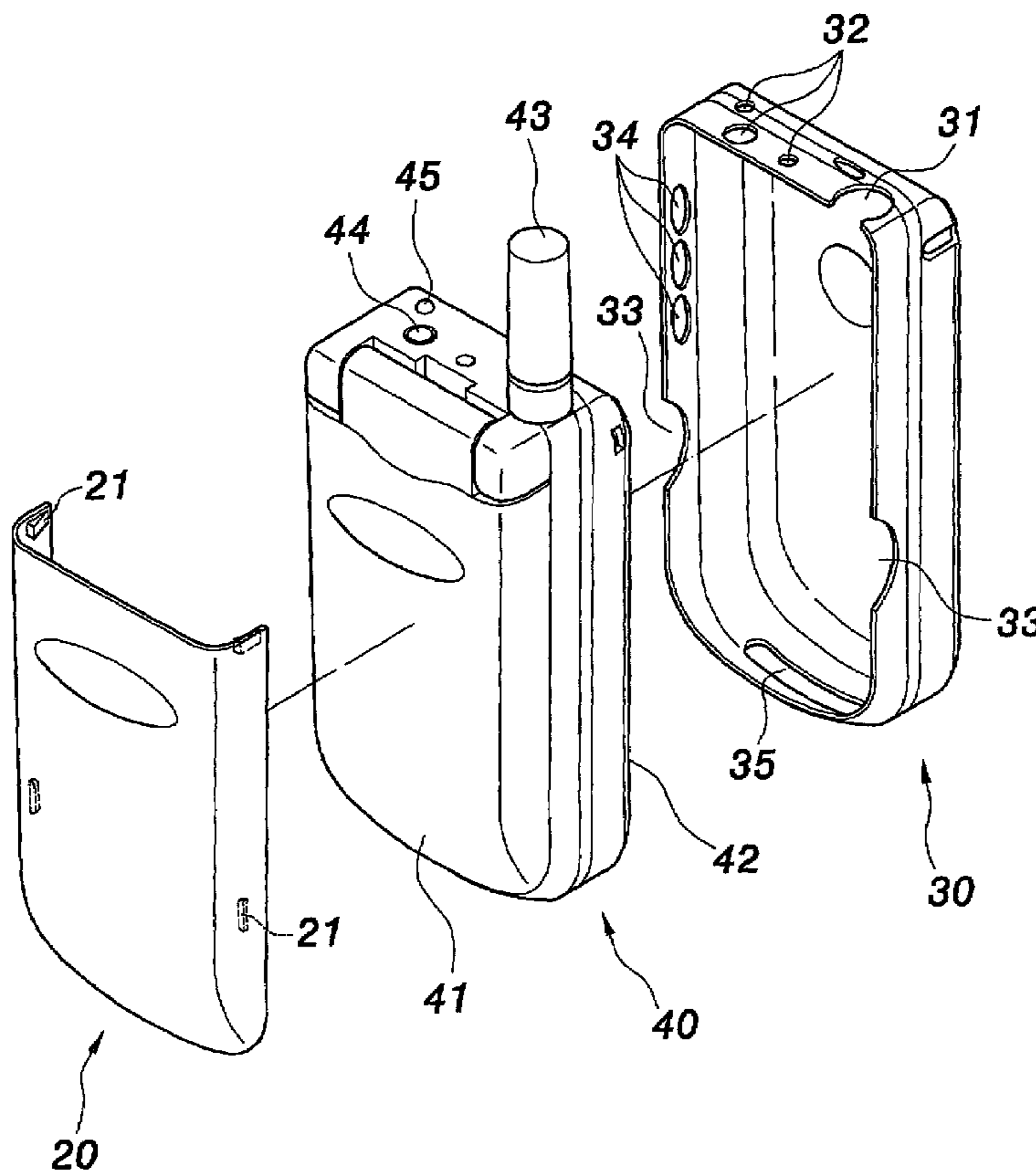
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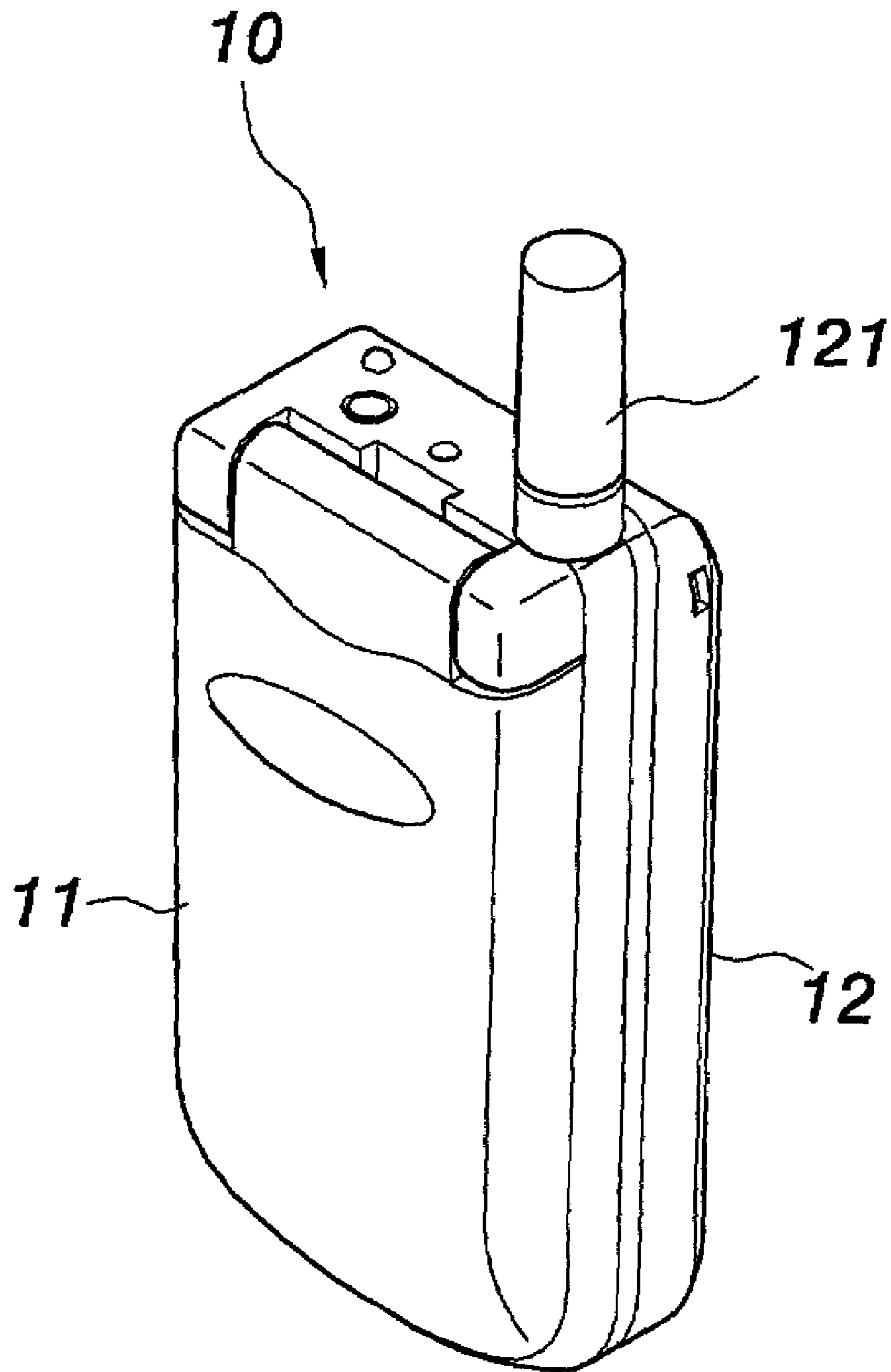
*Primary Examiner*—Bing Q. Bui  
(74) *Attorney, Agent, or Firm*—Barnes & Thornburg LLP; Mark J. Nahnsen

(57) **ABSTRACT**

The present invention relates to a protective mask of mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies can be joined with a front and a rear phone housings of a mobile phone, respectively, to effectively prevent abrasion of the mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided. Moreover, trend and fashion of the mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

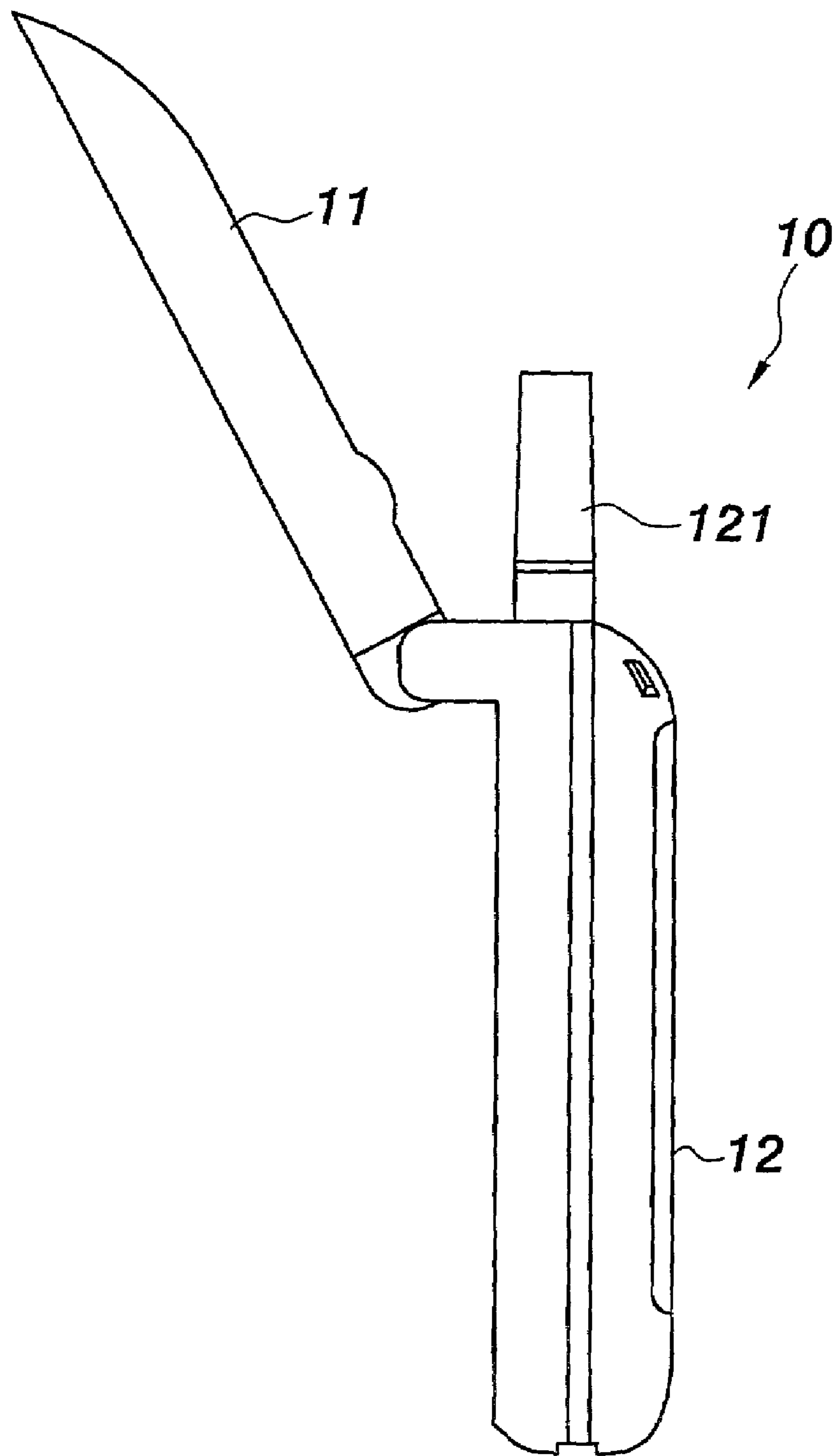
**10 Claims, 7 Drawing Sheets**



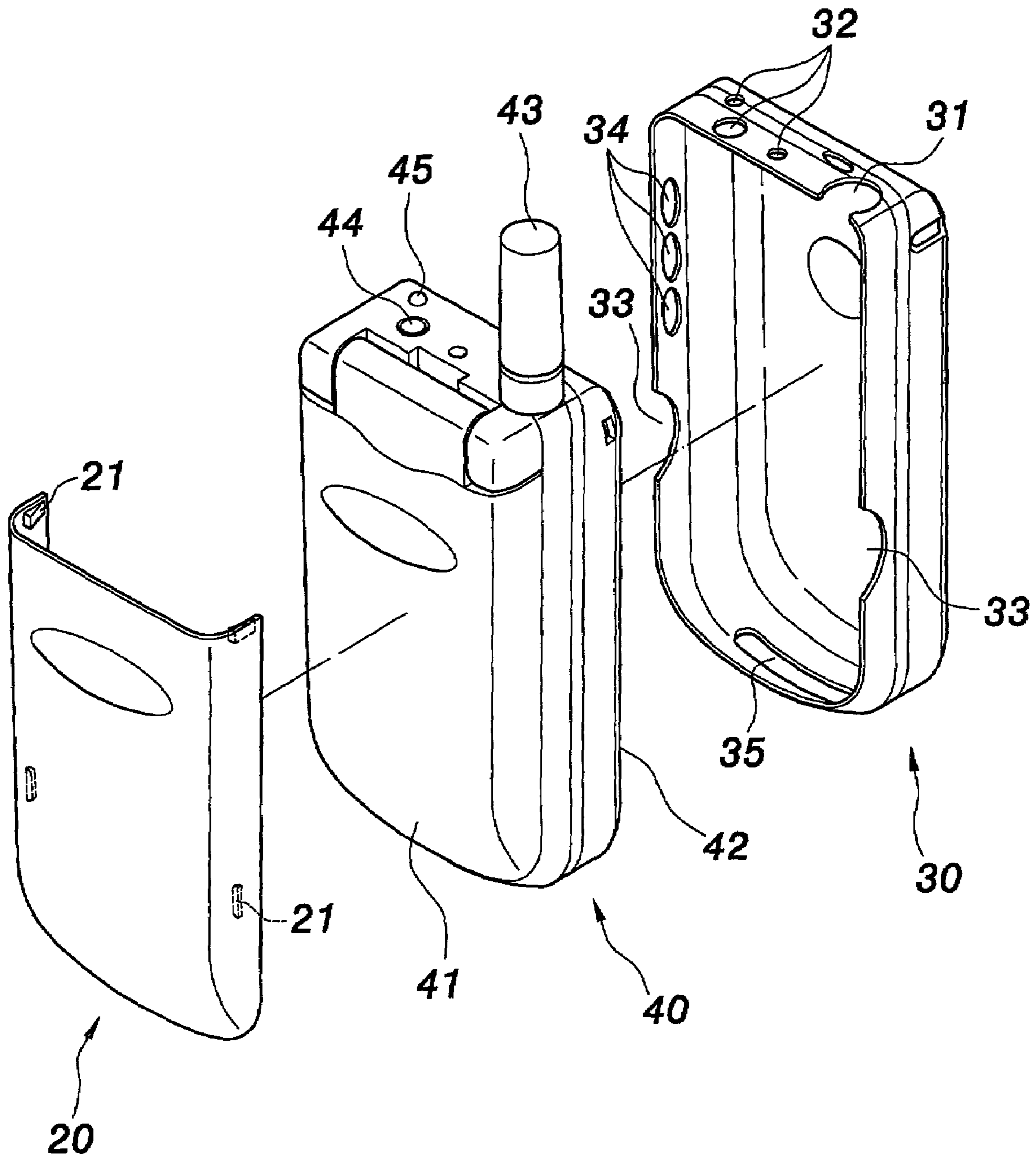


**FIG. 1**  
**PRIOR ART**

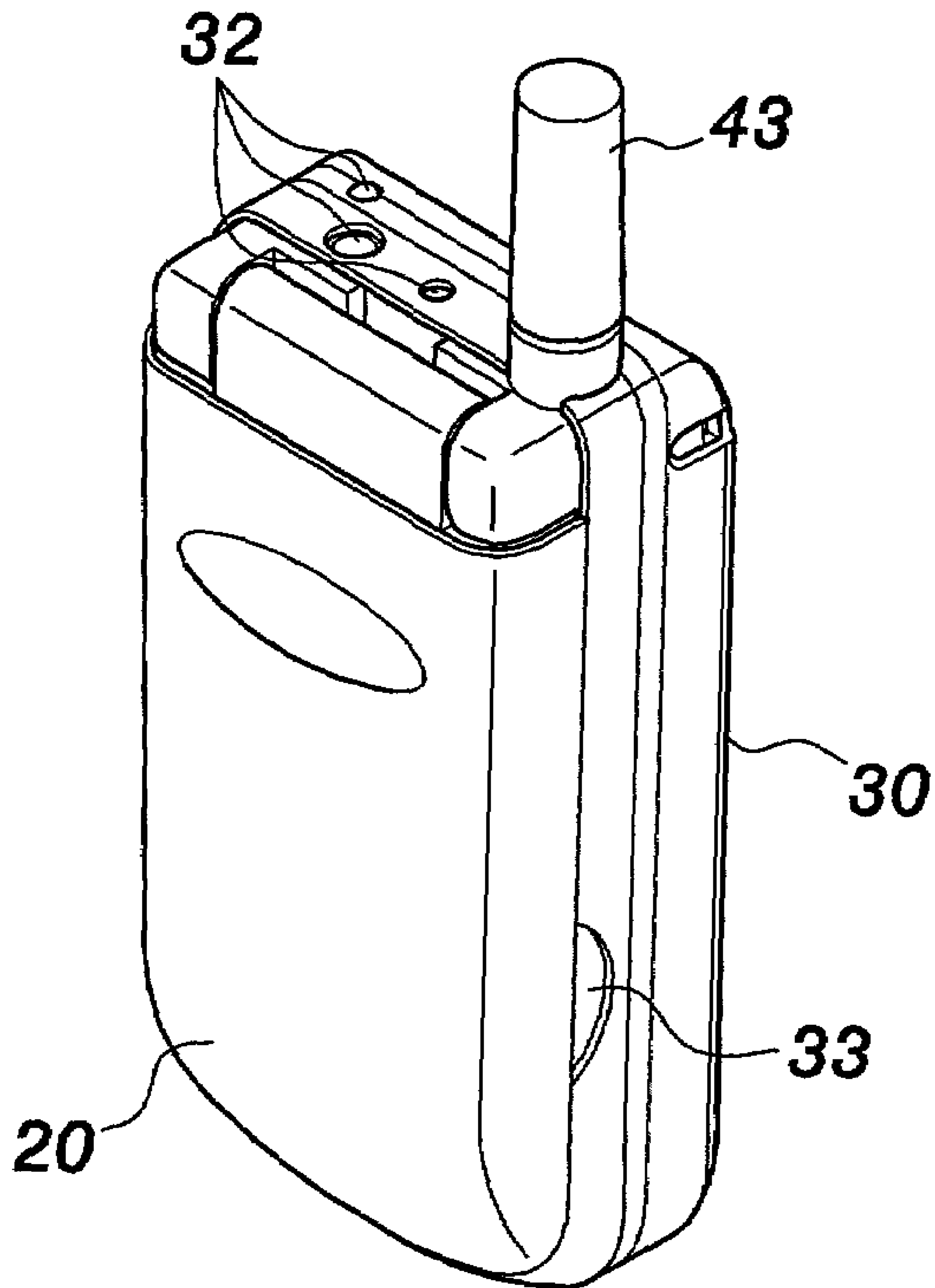




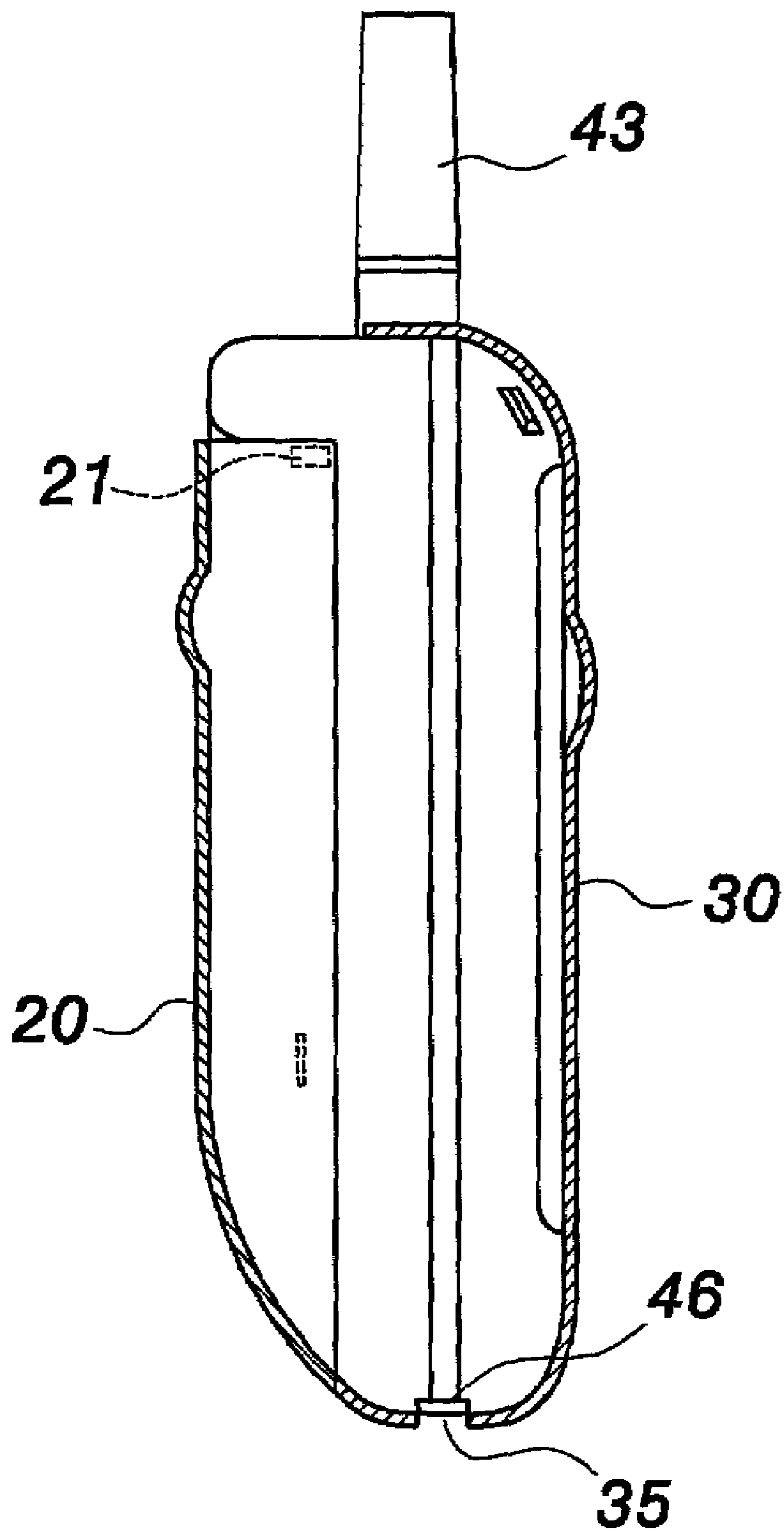
**FIG. 2**  
**PRIOR ART**



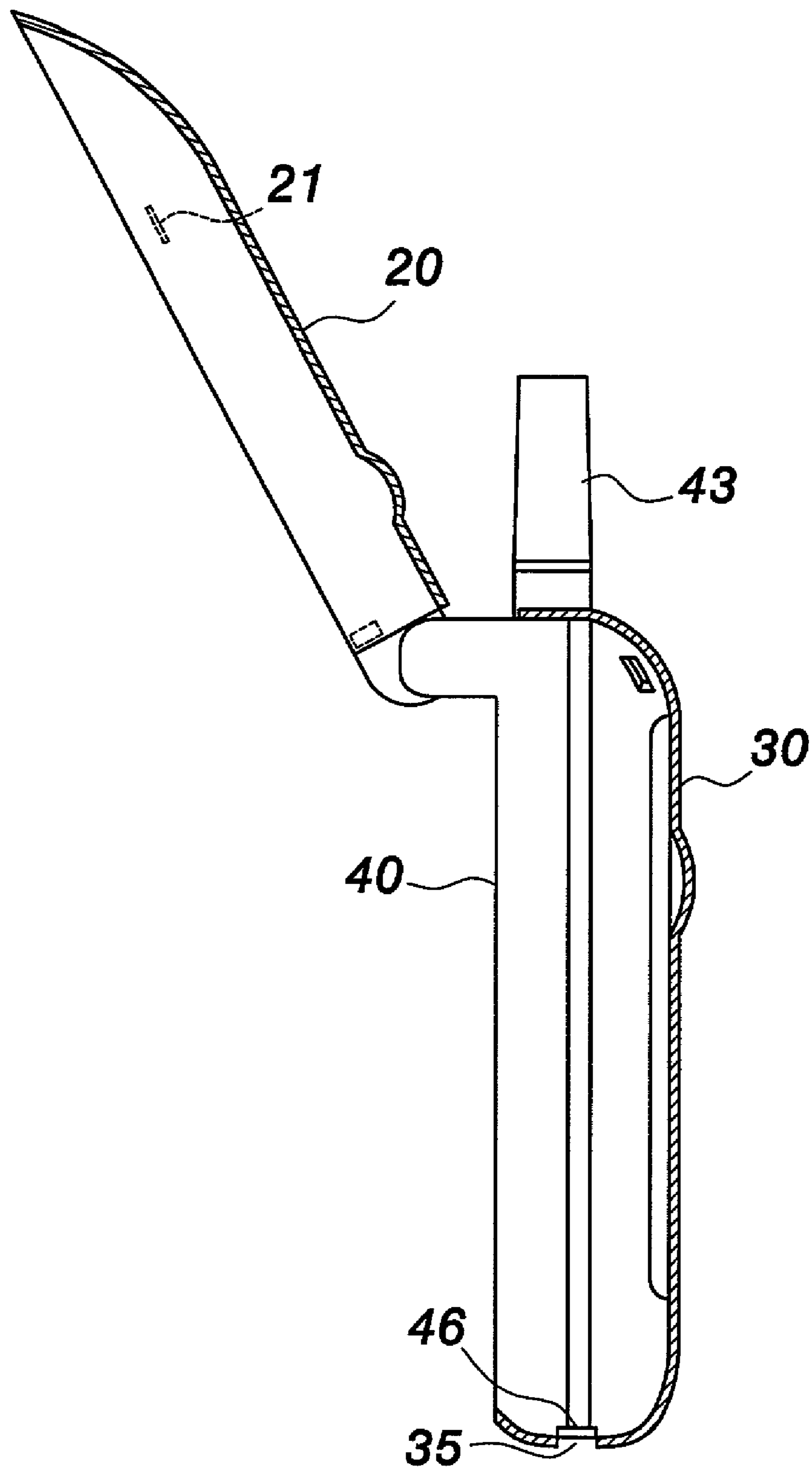
**FIG. 3**



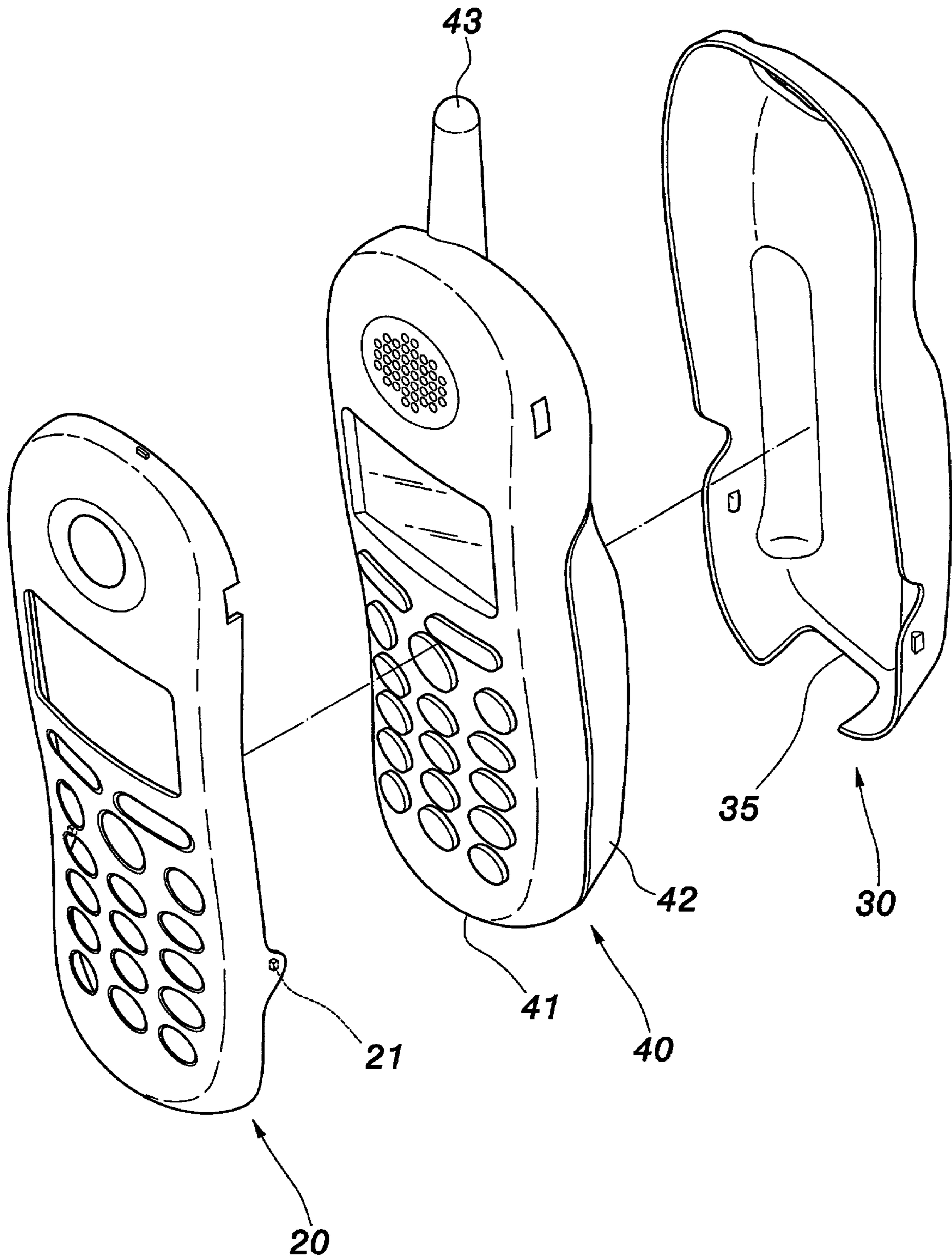
**FIG. 4**



**FIG. 5**



**FIG. 6**



**FIG. 7**

## US 7,194,291 B2

## 1

## PROTECTIVE MASK OF MOBILE PHONE

## FIELD OF THE INVENTION

The present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone

## BACKGROUND OF THE INVENTION

FIGS. 1 and 2 show the structure of a prior art mobile phone. The outer look of the structure is approximately a rectangular parallelepiped comprising a front phone housing and a rear phone housing. One end of the front phone housing 11 is pivotally joined with one end of the rear phone housing 12, as shown in FIG. 2. An antenna 121 is disposed on the rear phone housing 12. A mobile phone 10 is formed after assembling the front and rear phone housings 11 and 12. The mobile phone 10 can be used for receiving a call, dialing a telephone number, making a call, displaying messages, and setting functions.

However, because the front and rear phone housings 11 and 12 of the mobile phone 10 are very smooth and delicate, abrasion may easily arise due to carelessness of a user so as to generate ill-favored scars thereon, resulting in the deterioration of the quality of the mobile phone and the fall of its value.

Moreover, the design of the mobile phone 10 tends to be more and more diversified in consideration of trend and fashion. The user usually spends a lot of money to change the mobile phone 10 to adhere to the fashion, resulting in waste of money.

Accordingly, the above mobile phone structure has inconvenience and drawbacks in practical installation and use. The present invention aims to resolve the problems in the prior art.

## SUMMARY OF THE INVENTION

The primary object of the present invention is to provide a protective mask of mobile phone to effectively prevent abrasion of a mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided.

The secondary object of the present invention is to provide a protective mask of mobile phone so that trend and fashion of a mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

To achieve the above objects, the present invention provides a protective mask of mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies are integrally formed by means of mold ejection of plastic. Patterns, types, or nameplates can be printed on the upper and lower cover bodies. The upper and lower cover bodies can sheathe a mobile phone therein. A gap, cavities, and slots corresponding to an antenna, an earphone cavity, an incoming-call informing light and so on of the mobile phone are disposed on the lower cover body so that a user can successfully receive a call and use various kinds of functions and settings of the mobile phone.

The various objects and advantages of the present invention will be more readily understood from the following detailed description when read in conjunction with the appended drawings, in which:

## 2

## BRIEF DESCRIPTION OF THE DRAWINGS

FIG. 1 is a perspective view of a prior art mobile phone; FIG. 2 is a diagram showing the use state of a prior art mobile phone;

FIG. 3 is an exploded perspective view of the present invention and a mobile phone;

FIG. 4 is a perspective view of the present invention assembled with a mobile phone;

FIG. 5 is a cross-sectional view of the present invention assembled with a mobile phone;

FIG. 6 is a diagram showing the use state of the present invention assembled with a mobile phone; and

FIG. 7 is an exploded perspective view according to a second embodiment of the present invention.

## DETAILED DESCRIPTION OF THE PREFERRED EMBODIMENTS

As shown in FIGS. 3 to 6, the present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone. The protective mask of mobile phone of the present invention comprises an upper cover body 20 and a lower cover body 30.

The upper cover body 20 is integrally formed by mold ejection of plastic. Patterns, types, or nameplates can be printed on a front side face of the upper cover body 20. The upper cover body 20 can be joined with a front phone housing 41 of a mobile phone 40, as shown in FIG. 4. A rear side face of the upper cover body 20 has a plurality of flanges 21, as shown in FIG. 3. The flanges 21 can be retained at the edge of the front phone housing 41 of the mobile phone 40. The front phone housing 41 of the mobile phone 40 can be sheathed in the upper cover body 20, as shown in FIG. 5.

The lower cover body 30 is integrally formed by mold ejection of plastic. Patterns, types, or nameplates can be printed on the lower cover body 30. The lower cover body 30 can be joined with a rear phone housing 42 of the mobile phone 40, as shown in FIG. 4. The lower cover body 30 has a gap 31 to retain an antenna 43 of the mobile phone 40, as shown in FIG. 3. A plurality of cavities 32 are disposed beside the gap 31 of the lower cover body 30. The cavities 32 can correspond to an earphone cavity 44, an incoming-call informing light 45 and so on of the mobile phone 40 so that a user can conveniently use the functions of the mobile phone 40.

Finger recessions 33 are respectively disposed at two sides of the lower cover body 30 so that a user can easily unfold the pivotally joined front phone housing 41 and rear phone housing 42 to receive a call or operate the mobile phone 40, as shown in FIG. 6. The finger recessions 33 can also let the user conveniently separate the mobile phone 40 and the lower cover body 30 for performing operations such as replacing a battery (not shown) of the mobile phone 40. A plurality of holes 34 are disposed at one side of the lower cover body 30. The holes 34 can correspond to function keys (not shown) of the mobile phone 40 so that the user can successfully receive a call or set functions.

A bottom of the lower cover body 30 has a slot 35, which can correspond to a socket 46 (shown in FIG. 5) of the mobile phone 40 so that a user can plug in a power supply (not shown) of the mobile phone 40 to charge or recharge the mobile phone 40.

As shown in FIG. 7, a different upper cover body 20 and a different lower cover body 30 are matched according to the outer look of a different mobile phone 40 so as to satisfy

## US 7,194,291 B2

3

users having different mobile phones **40**. The connection and disposition ways are the same as the above first embodiment of the present invention.

The present invention uses the upper cover body **20** and the lower cover body **30** to sheathe the mobile phone **40** 5 therein so as to effectively prevent abrasion of the mobile phone **40** due to the carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Moreover, trend and fashion of the mobile phone **40** can be achieved without the need of replacing the mobile phone **40**. 10

Although the present invention has been described with reference to the preferred embodiments thereof, it will be understood that the invention is not limited to the details thereof. Various substitutions and modifications have been suggested in the foregoing description, and others will occur 15 to those of ordinary skill in the art. Therefore, all such substitutions and modifications are intended to be embraced within the scope of the invention as defined in the appended claims.

I claim: 20

**1.** A protective mask adapted to be coupled to an exterior housing of a mobile phone having internal components including circuitry and a battery, which are covered by the exterior housing, the protective mask comprising:

first mask portion, molded to conform to the shape of a 25 first portion of the exterior housing of the mobile phone, the first mask portion having flanges to couple the first mask portion to the exterior housing of the mobile phone to retain the first mask portion to the first portion of the exterior housing so that the first mask portion covers the first portion of the exterior housing of the mobile phone; and 30

a second mask portion, molded to conform to the shape of a second portion of the exterior housing of the mobile phone, the second mask portion adapted to be coupled 35 to the mobile phone to retain the second mask portion to the second portion of the exterior housing so that the second mask portion covers the second portion of the exterior housing of the mobile phone;

wherein said first and second mask portions are retained 40 to the exterior housing of the mobile phone.

**2.** The protective mask of claim **1**, wherein patterns, types, or nameplates can be printed on said first and second mask portions.

**3.** The protective mask of claim **1**, wherein the first mask 45 portion includes at least one opening to permit access to features of the mobile phone.

**4.** The protective mask of claim **1**, wherein said second mask portion includes at least one opening to permit access 50 to features of the mobile phone.

**5.** The protective mask of claim **1**, wherein said second mask portion includes an opening corresponding to a socket of said mobile phone so that a user can conveniently plug in a power supply to charge said mobile phone.

**6.** A protective mask adapted to be coupled to an exterior 55 housing of a mobile phone, the mobile phone having internal components including circuitry and a battery, which are covered by the exterior housing, the protective mask comprising:

4

an first mask portion, molded to conform to the shape of a first portion of the exterior housing of the mobile phone, the first mask portion having flanges to couple the first mask portion to the exterior housing of the mobile phone to retain the first mask portion to the first portion of the exterior housing so that the first mask portion covers the first portion of the exterior housing of the mobile phone;

said first mask portion including an opening that is associated with an opening in the exterior housing to permit access to a feature of the mobile phone; and

a second mask portion, molded to conform to the shape of a second portion of the exterior housing of the mobile phone, the second mask portion adapted to be coupled 10 to the mobile phone to retain the second mask portion to the second portion of the exterior housing so that the second mask portion covers the second portion of the exterior housing of the mobile phone;

wherein said first and second mask portions are retained 20 to the exterior housing of the mobile phone.

**7.** The protective mask of claim **6**, wherein patterns, types, or nameplates can be printed on said first and second mask portions.

**8.** The protective mask of claim **6**, wherein the second mask portion includes an opening to permit access to a feature of the mobile phone.

**9.** A protective mask adapted to be coupled to an exterior housing of a mobile phone, the mobile phone having internal components including circuitry and a battery, which are covered by the exterior housing, the protective mask comprising:

an first mask portion, molded to conform to the shape of a first portion of the exterior housing of the mobile phone, the first mask portion having a flange to couple the first mask portion to the exterior housing of the mobile phone to retain the first mask portion to the first portion of the exterior housing so that the first mask portion covers the first portion of the exterior housing of the mobile phone;

the first mask portion including an opening that is associated with an opening in the exterior housing to permit access to a feature of the mobile phone;

a second mask portion, molded to conform to the shape of a second portion of the exterior housing of the mobile phone, the second mask portion adapted to be coupled 45 to the housing of the mobile phone to retain the second mask portion to the second portion of the exterior housing so that the second mask portion covers the second portion of the exterior housing of the mobile phone; and 50

the second mask portion includes an opening that is associated with an opening in the exterior housing to permit access to a feature of the mobile phone.

**10.** The protective mask of claim **9**, wherein patterns, types, or nameplates can be printed on said first and second mask portions.

\* \* \* \* \*



# **EXHIBIT B**

**TO**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**United States Patent No.  
7,941,195**



US007941195B2

(12) **United States Patent**  
**Peng**

(10) **Patent No.:** **US 7,941,195 B2**  
(45) **Date of Patent:** **\*May 10, 2011**

(54) **PROTECTIVE MASK OF MOBILE PHONE**

(75) Inventor: **Kuan-Lin Peng**, Taipei (TW)

(73) Assignee: **Gregory J. Kim**, Westmont, IL (US)

(\*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 654 days.

This patent is subject to a terminal disclaimer.

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(21) Appl. No.: **11/673,237**

(22) Filed: **Feb. 9, 2007**

(65) **Prior Publication Data**

US 2007/0191079 A1 Aug. 16, 2007

**Related U.S. Application Data**

(63) Continuation of application No. 09/888,488, filed on Jun. 26, 2001, now Pat. No. 7,194,291.

(30) **Foreign Application Priority Data**

Nov. 17, 2000 (CN) ..... 00 2 52902 U

(51) **Int. Cl.**  
**H04M 1/00** (2006.01)

(52) **U.S. Cl.** ..... **455/575.8**; 455/550.1; 455/575.1

(58) **Field of Classification Search** ..... 455/575.8, 455/575.9, 575.1, 550.1, 90.1, 90.3, 348, 455/349, 550; 379/433.01, 433.11, 451

See application file for complete search history.

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*Primary Examiner* — Kent Chang

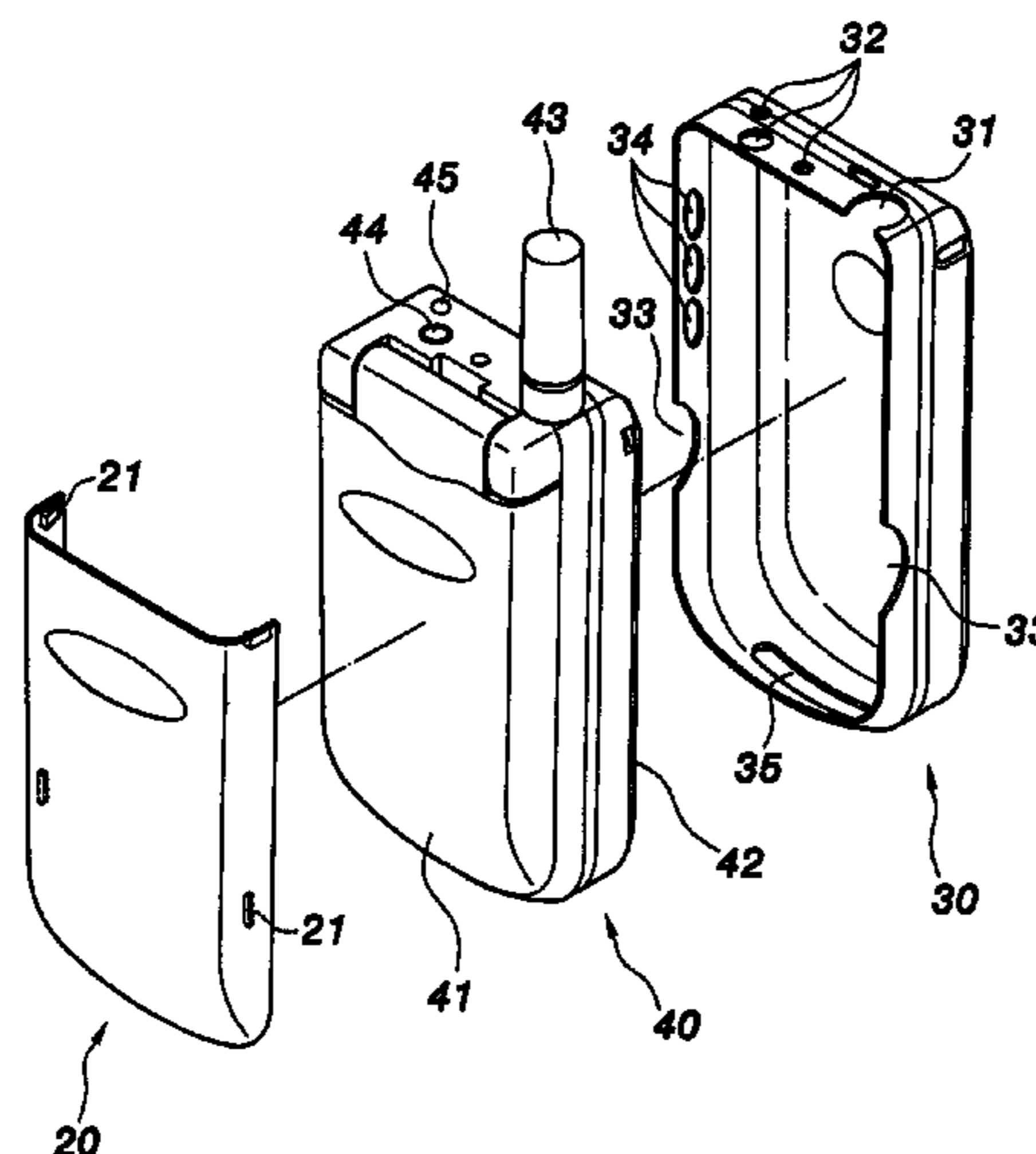
*Assistant Examiner* — Dinh P Nguyen

(74) *Attorney, Agent, or Firm* — Jansson Shupe & Munger Ltd.

(57) **ABSTRACT**

The present invention relates to a protective mask of mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies can be joined with a front and a rear phone housings of a mobile phone, respectively, to effectively prevent abrasion of the mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided. Moreover, trend and fashion of the mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

**12 Claims, 7 Drawing Sheets**



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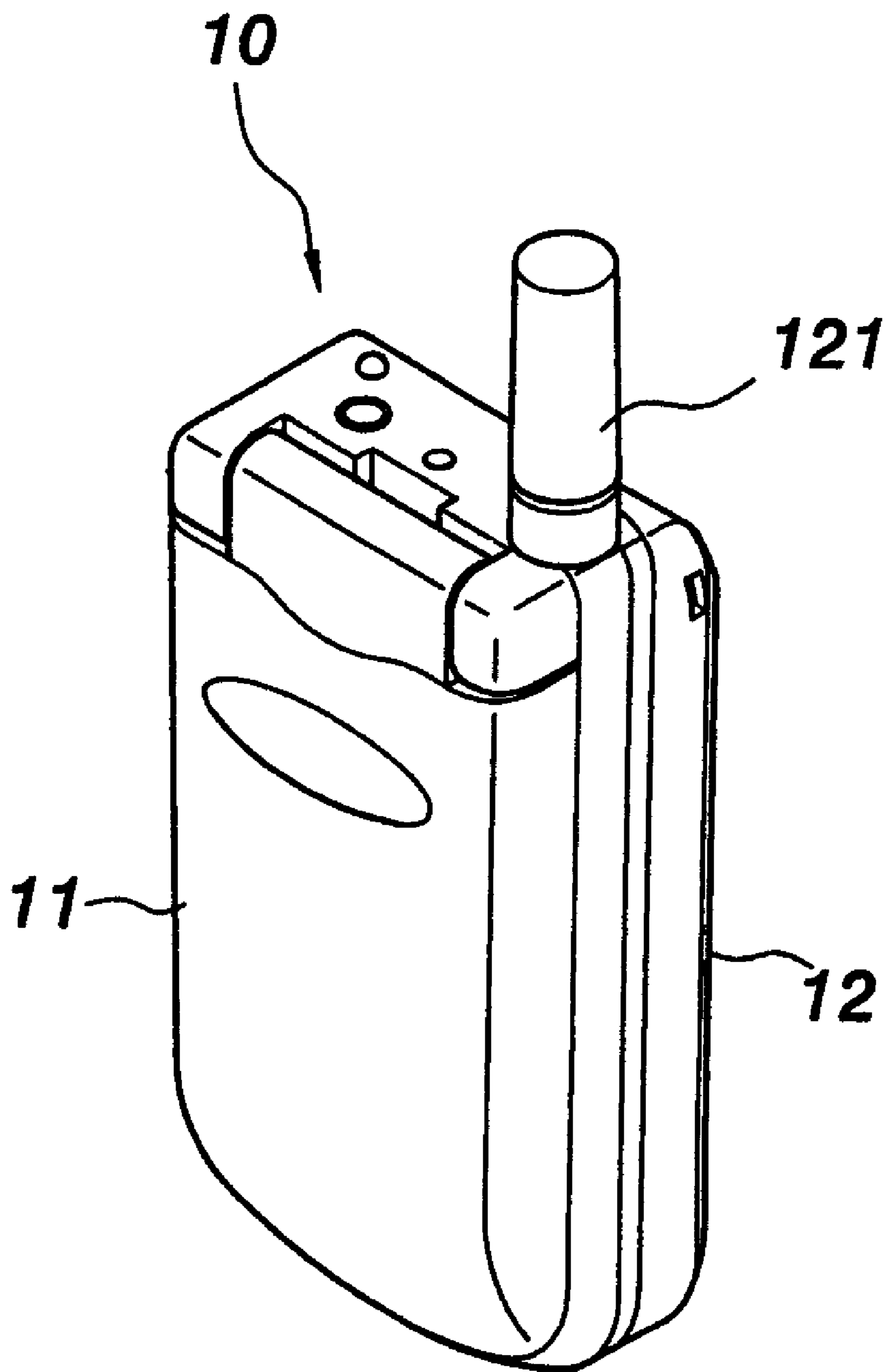
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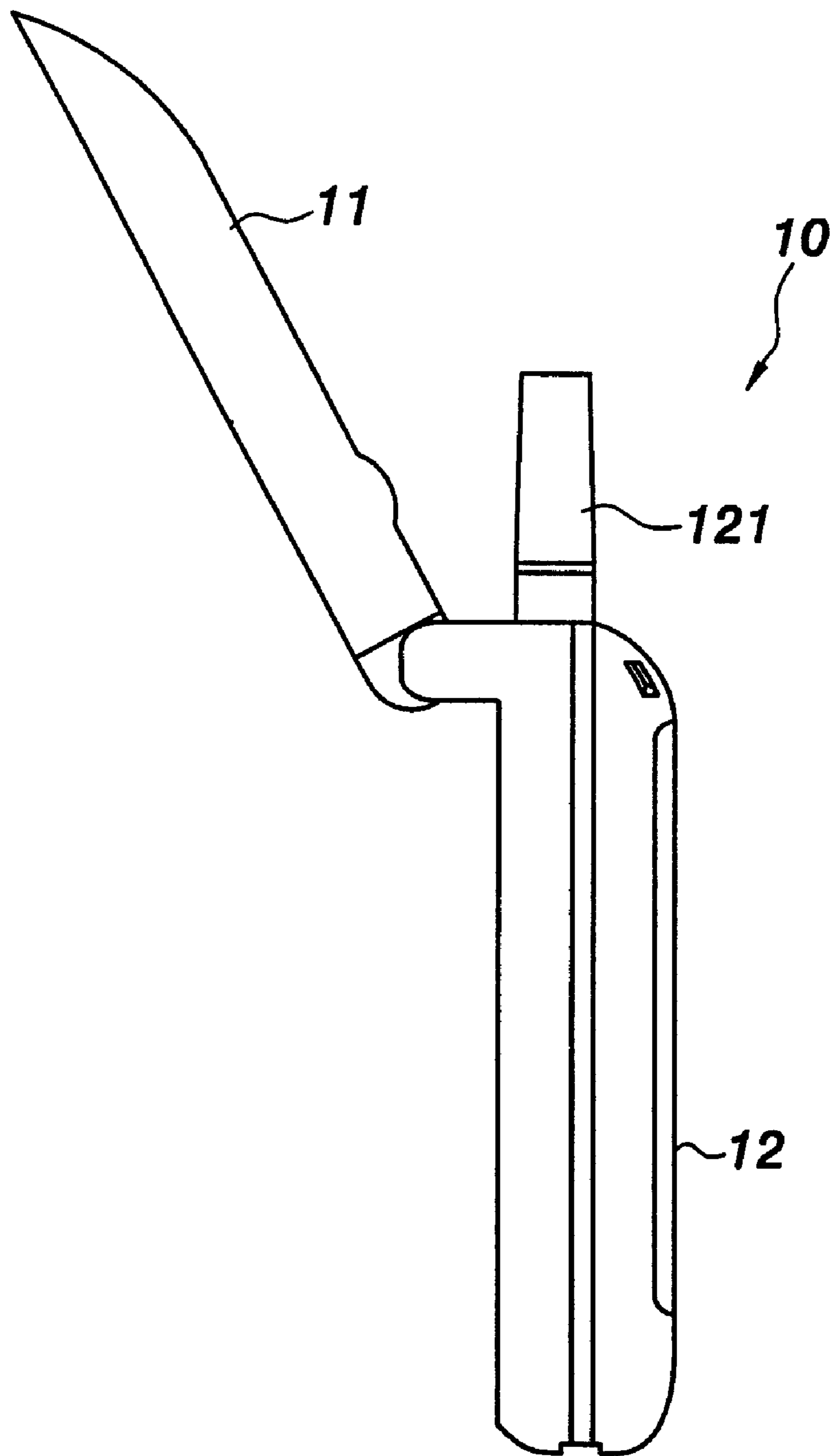
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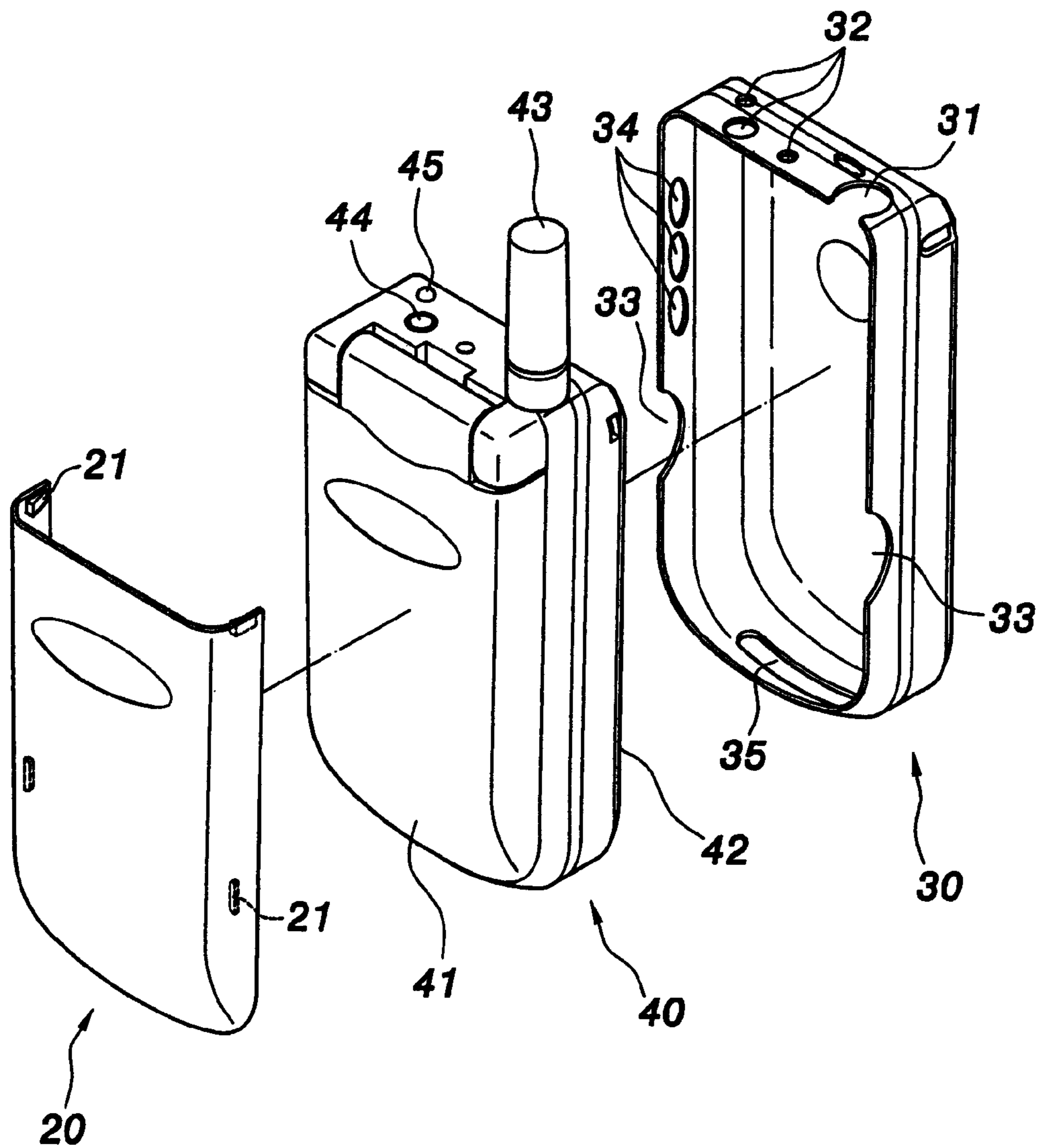
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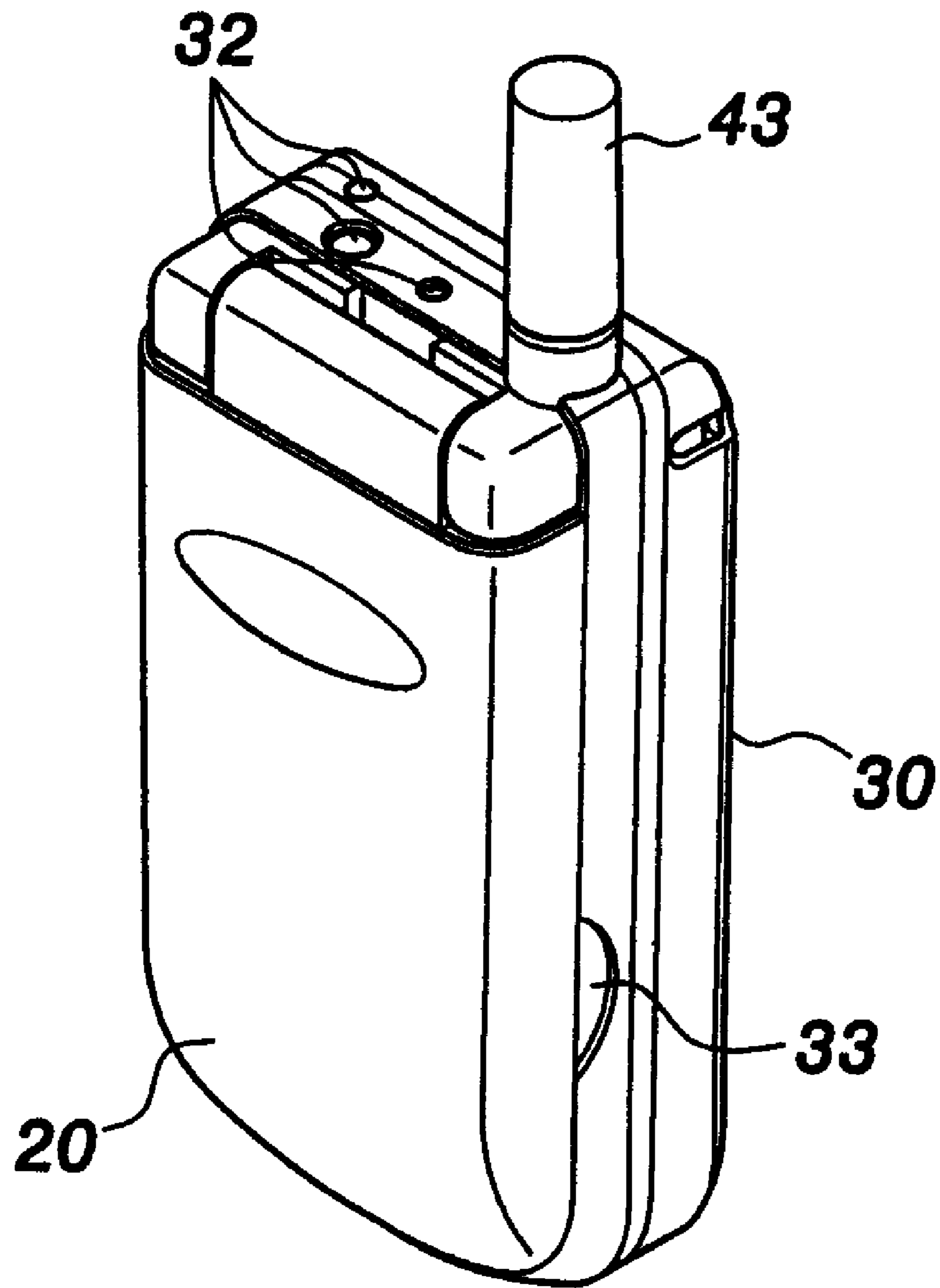
**FIG. 1**  
**PRIOR ART**



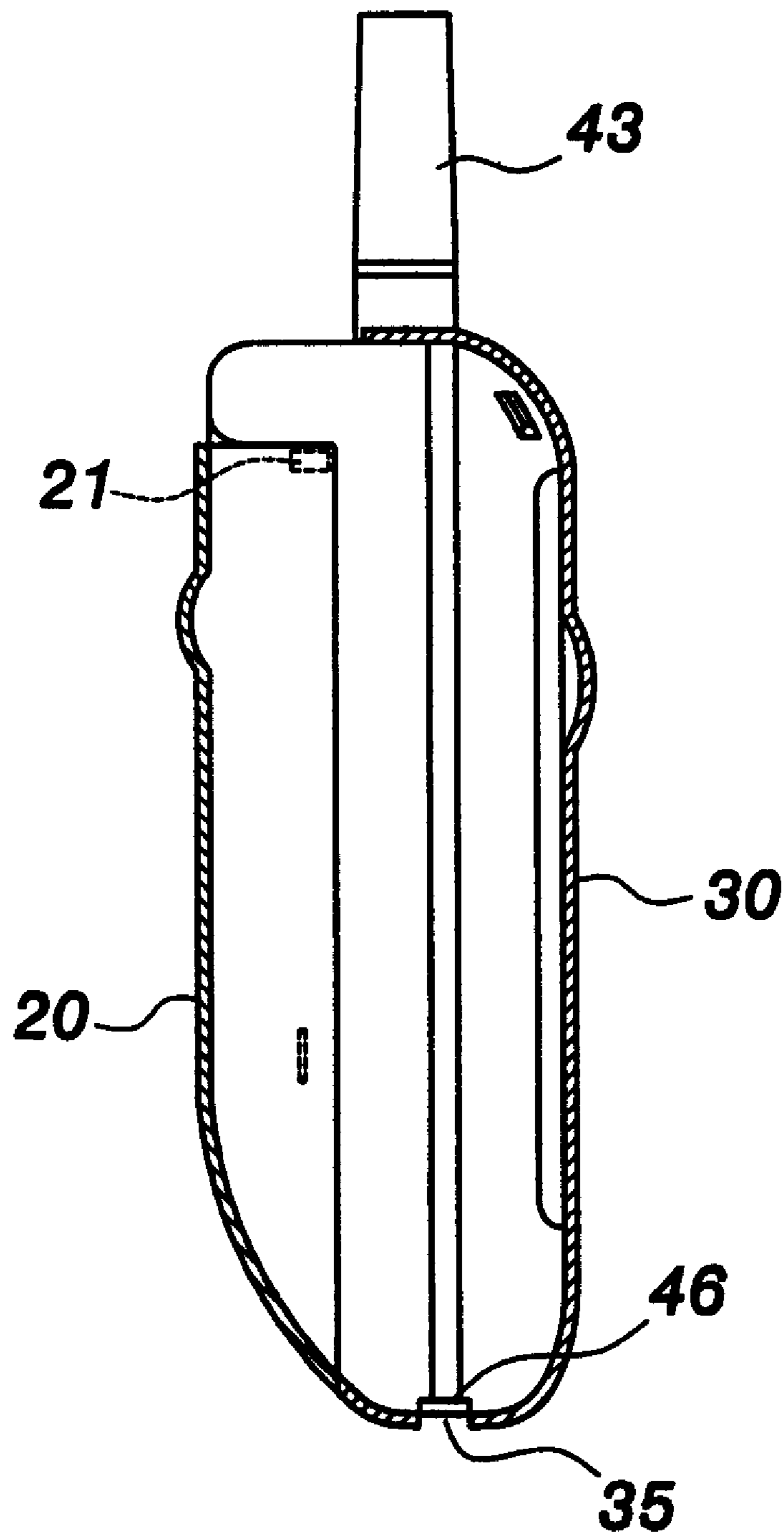
**FIG. 2**  
**PRIOR ART**



**FIG. 3**

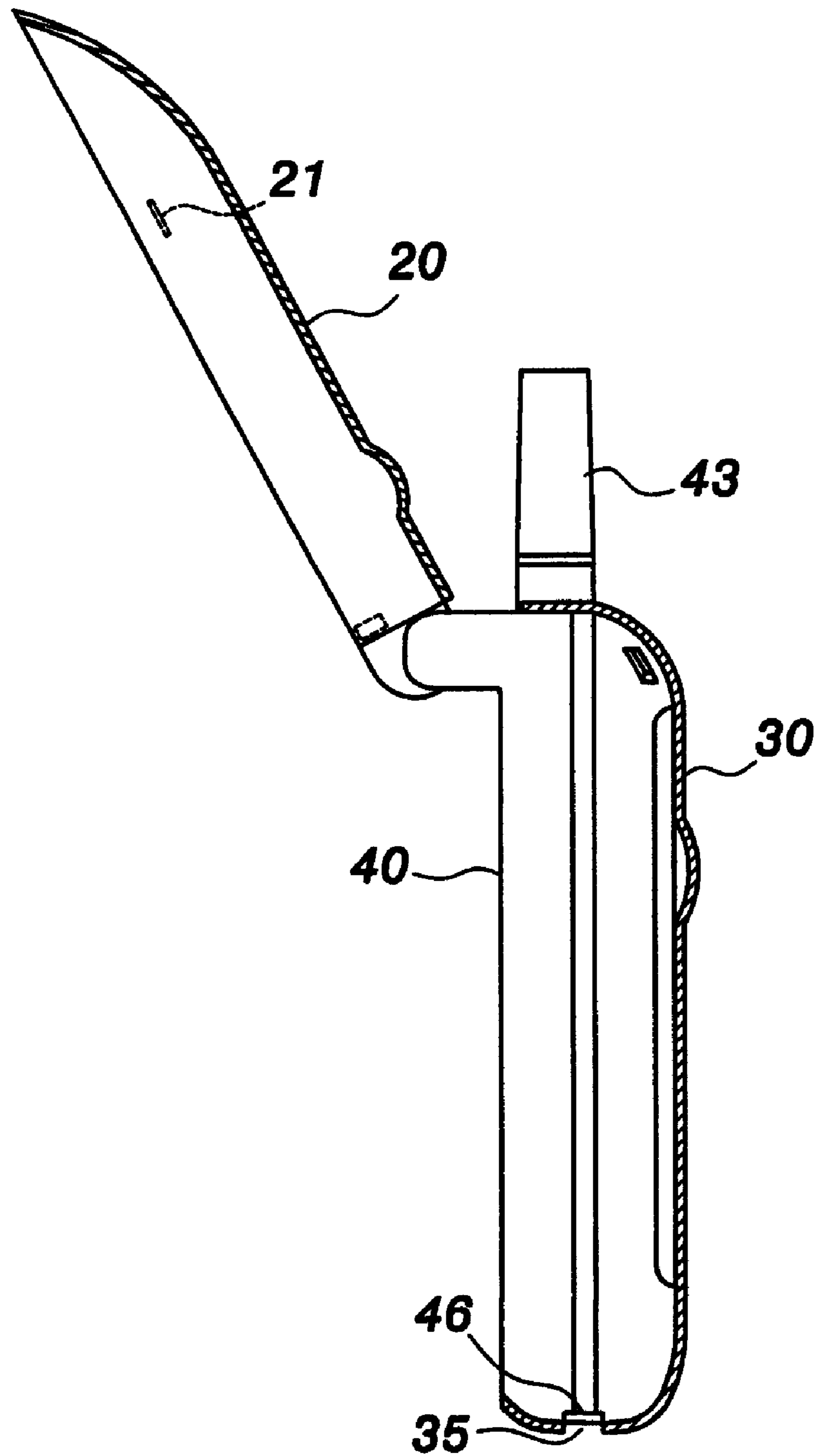


**FIG. 4**

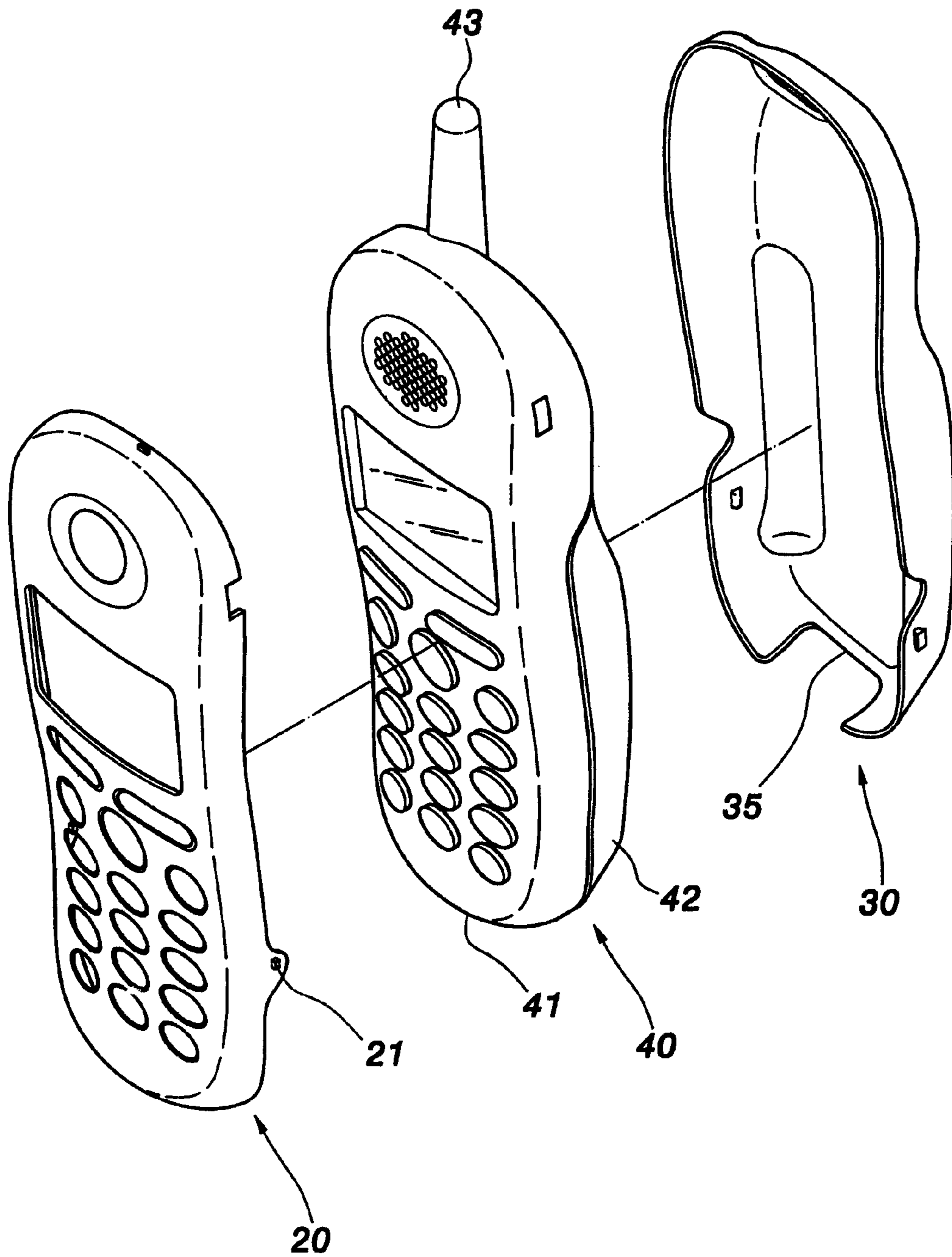


**FIG. 5**





**FIG. 6**



**FIG. 7**

## US 7,941,195 B2

1

## PROTECTIVE MASK OF MOBILE PHONE

## CROSS-REFERENCE TO RELATED PATENT APPLICATIONS

This continuation application claims priority to U.S. patent application Ser. No. 09/888,488 filed Jun. 26, 2001, now U.S. Pat. No. 7,194,291 and Chinese Patent Application No. CN00252902.5 filed Nov. 17, 2000, which are expressly incorporated by reference herein.

## FIELD OF THE INVENTION

The present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone

## BACKGROUND OF THE INVENTION

FIGS. 1 and 2 show the structure of a prior art mobile phone. The outer look of the structure is approximately a rectangular parallelepiped comprising a front phone housing and a rear phone housing. One end of the front phone housing 11 is pivotally joined with one end of the rear phone housing 12, as shown in FIG. 2. An antenna 121 is disposed on the rear phone housing 12. A mobile phone 10 is formed after assembling the front and rear phone housings 11 and 12. The mobile phone 10 can be used for receiving a call, dialing a telephone number, making a call, displaying messages, and setting functions.

However, because the front and rear phone housings 11 and 12 of the mobile phone 10 are very smooth and delicate, abrasion may easily arise due to carelessness of a user so as to generate ill-favored scars thereon, resulting in the deterioration of the quality of the mobile phone and the fall of its value.

Moreover, the design of the mobile phone 10 tends to be more and more diversified in consideration of trend and fashion. The user usually spends a lot of money to change the mobile phone 10 to adhere to the fashion, resulting in waste of money.

Accordingly, the above mobile phone structure has inconvenience and drawbacks in practical installation and use. The present invention aims to resolve the problems in the prior art.

## SUMMARY OF THE INVENTION

The primary object of the present invention is to provide a protective mask of mobile phone to effectively prevent abrasion of a mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided.

The secondary object of the present invention is to provide a protective mask of mobile phone so that trend and fashion of a mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

To achieve the above objects, the present invention provides a protective mask of mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies are integrally formed by means of mold ejection of plastic. Patterns, types, or nameplates can be printed on the upper and lower cover bodies. The upper and lower cover bodies can sheathe a mobile phone therein. A gap, cavities, and slots corresponding to an antenna, an earphone cavity, an incoming-call informing light and so on of the mobile phone are disposed on the lower cover body so that a user can

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successfully receive a call and use various kinds of functions and settings of the mobile phone.

The various objects and advantages of the present invention will be more readily understood from the following detailed description when read in conjunction with the appended drawings, in which:

## BRIEF DESCRIPTION OF THE DRAWINGS

- FIG. 1 is a perspective view of a prior art mobile phone;  
 FIG. 2 is a diagram showing the use state of a prior art mobile phone;  
 FIG. 3 is an exploded perspective view of the present invention and a mobile phone;  
 FIG. 4 is a perspective view of the present invention assembled with a mobile phone;  
 FIG. 5 is a cross-sectional view of the present invention assembled with a mobile phone;  
 FIG. 6 is a diagram showing the use state of the present invention assembled with a mobile phone; and  
 FIG. 7 is an exploded perspective view according to a second embodiment of the present invention.

## DETAILED DESCRIPTION OF THE PREFERRED EMBODIMENTS

As shown in FIGS. 3 to 6, the present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone. The protective mask of mobile phone of the present invention comprises an upper cover body 20 and a lower cover body 30.

The upper cover body 20 is integrally formed by mold ejection of plastic. Patterns, types, or nameplates can be printed on a front side face of the upper 20 cover body 20. The upper cover body 20 can be joined with a front phone housing 41 of a mobile phone 40, as shown in FIG. 4. A rear side face of the upper cover body 20 has a plurality of flanges 21, as shown in FIG. 3. The flanges 21 can be retained at the edge of the front phone housing 41 of the mobile phone 40. The front phone housing 41 of the mobile phone 40 can be sheathed in the upper cover body 20, as shown in FIG. 5.

The lower cover body 30 is integrally formed by mold ejection of plastic. Patterns, types, or nameplates can be printed on the lower cover body 30. The lower cover body 30 can be joined with a rear phone housing 42 of the mobile phone 40, as shown in FIG. 4. The lower cover body 30 has a gap 31 to retain an antenna 43 of the mobile phone 40, as shown in FIG. 3. A plurality of cavities 32 are disposed beside the gap 31 of the lower cover body 30. The cavities 32 can correspond to an earphone cavity 44, an incoming-call informing light 45 and so on of the mobile phone 40 so that a user can conveniently use the functions of the mobile phone 40.

Finger recessions 33 are respectively disposed at two sides of the lower cover body 30 so that a user can easily unfold the pivotally joined front phone housing 41 and rear phone housing 42 to receive a call or operate the mobile phone 40, as shown in FIG. 6. The finger recessions 33 can also let the user conveniently separate the mobile phone 40 and the lower cover body 30 for performing operations such as replacing a battery (not shown) of the mobile phone 40. A plurality of holes 34 are disposed at one side of the lower cover body 30. The holes 34 can correspond to function keys (not shown) of the mobile phone 40 so that the user can successfully receive a call or set functions.

A bottom of the lower cover body 30 has a slot 35, which can correspond to a socket 46 (shown in FIG. 5) of the mobile

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phone **40** so that a user can plug in a power supply (not shown) of the mobile phone **40** to charge or recharge the mobile phone **40**.

As shown in FIG. 7, a different upper cover body **20** and a different lower cover body **30** are matched according to the outer look of a different mobile phone **40** so as to satisfy users having different mobile phones **40**. The connection and disposition ways are the same as the above first embodiment of the present invention.

The present invention uses the upper cover body **20** and the lower cover body **30** to sheathe the mobile phone **40** therein so as to effectively prevent abrasion of the mobile phone **40** due to the carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Moreover, trend and fashion of the mobile phone **40** can be achieved without the need of replacing the mobile phone **40**.

Although the present invention has been described with reference to the preferred embodiments thereof, it will be understood that the invention is not limited to the details thereof. Various substitutions and modifications have been suggested in the foregoing description, and others will occur to those of ordinary skill in the art. Therefore, all such substitutions and modifications are intended to be embraced within the scope of the invention as defined in the appended claims.

What is claimed is:

**1.** A protective mask adapted to be coupled to an exterior housing of a mobile phone having internal components including circuitry and a battery, which are covered by the exterior housing, the protective mask comprising:

a first mask portion, molded to conform to the shape of a first portion of the exterior housing of the mobile phone, the first mask portion adapted to be coupled to the mobile phone to retain the first mask portion to the first portion of the exterior housing so that the first mask portion covers the first portion of the exterior housing of the mobile phone; and

a second mask portion, molded to conform to the shape of a second portion of the exterior housing of the mobile phone, the second mask portion adapted to be coupled to the mobile phone to retain the second mask portion to the second portion of the exterior housing so that the second mask portion covers the second portion of the exterior housing of the mobile phone;

wherein said first and second mask portions are retained to the exterior housing of the mobile phone.

**2.** The protective mask of claim **1**, wherein patterns, types, or nameplates can be printed on said first and second mask portions.

**3.** The protective mask of claim **1**, wherein the first mask portion includes at least one opening to permit access to features of the mobile phone.

**4.** The protective mask of claim **1**, wherein said second mask portion includes at least one opening to permit access to features of the mobile phone.

**5.** The protective mask of claim **1**, wherein said second mask portion includes an opening corresponding to a socket

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of said mobile phone so that a user can conveniently plug in a power supply to charge said mobile phone.

**6.** A protective mask adapted to be coupled to an exterior housing of a mobile phone, the mobile phone having internal components including circuitry and a battery, which are covered by the exterior housing, the protective mask comprising:

a first mask portion, molded to conform to the shape of a first portion of the exterior housing of the mobile phone, the first mask portion is adapted to be coupled to the mobile phone to retain the first mask portion to the first portion of the exterior housing so that the first mask portion covers the first portion of the exterior housing of the mobile phone;

said first mask portion including an opening that is associated with an opening in the exterior housing to permit access to a feature of the mobile phone; and

a second mask portion, molded to conform to the shape of a second portion of the exterior housing of the mobile phone, the second mask portion adapted to be coupled to the mobile phone to retain the second mask portion to the second portion of the exterior housing so that the second mask portion covers the second portion of the exterior housing of the mobile phone;

wherein said first and second mask portions are retained to the exterior housing of the mobile phone.

**7.** The protective mask of claim **6**, wherein patterns, types, or nameplates can be printed on said first and second mask portions.

**8.** The protective mask of claim **6**, wherein the second mask portion includes an opening to permit access to a feature of the mobile phone.

**9.** A protective mask adapted to be coupled to an exterior housing of a mobile phone having internal components including circuitry and a battery, which are covered by the exterior housing, the protective mask comprising:

a first mask portion, molded to conform to the shape of a first portion of the exterior housing of the mobile phone, the first mask portion having flanges to allow the first mask portion to be coupled to the mobile phone to retain the first mask portion to the first portion of the exterior housing so that the first mask portion covers the first portion of the exterior housing of the mobile phone.

**10.** The protective mask of claim **9**, further comprising a second mask portion, molded to conform to the shape of a second portion of the exterior housing of the mobile phone, the second mask portion adapted to be coupled to the mobile phone to retain the second mask portion to the second portion of the exterior housing so that the second mask portion covers the second portion of the exterior housing of the mobile phone.

**11.** The protective mask of claim **10**, wherein patterns, types, or nameplates can be printed on the first and second mask portions.

**12.** The protective mask of claim **11**, wherein the first mask portion includes at least one opening to permit access to features of the mobile phone.

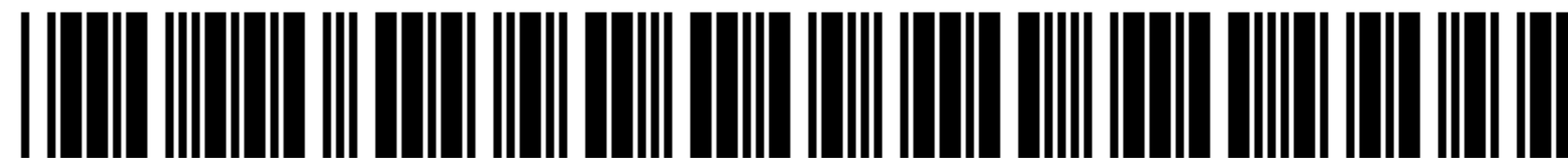
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# **EXHIBIT C**

**TO**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**United States Patent No.  
10,097,676**



US010097676B2

(12) **United States Patent**  
**Peng**

(10) **Patent No.:** **US 10,097,676 B2**  
(45) **Date of Patent:** **\*Oct. 9, 2018**

(54) **PROTECTIVE MASK OF MOBILE PHONE**

USPC .... 455/90.1, 90.3, 348, 349, 433.01, 433.11,  
455/451, 550, 550.1, 575.1  
See application file for complete search history.

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(\*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 119 days.

This patent is subject to a terminal disclaimer.

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(21) Appl. No.: **13/094,428**

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(22) Filed: **Apr. 26, 2011**

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(65) **Prior Publication Data**

US 2011/0201394 A1 Aug. 18, 2011

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**Related U.S. Application Data**

(63) Continuation of application No. 11/673,237, filed on Feb. 9, 2007, now Pat. No. 7,941,195, which is a continuation of application No. 09/888,488, filed on Jun. 26, 2001, now Pat. No. 7,194,291.

*Primary Examiner* — Dinh Nguyen

(74) *Attorney, Agent, or Firm* — Invention Mine LLC

(30) **Foreign Application Priority Data**

Nov. 17, 2000 (CN) ..... 252902

(57) **ABSTRACT**

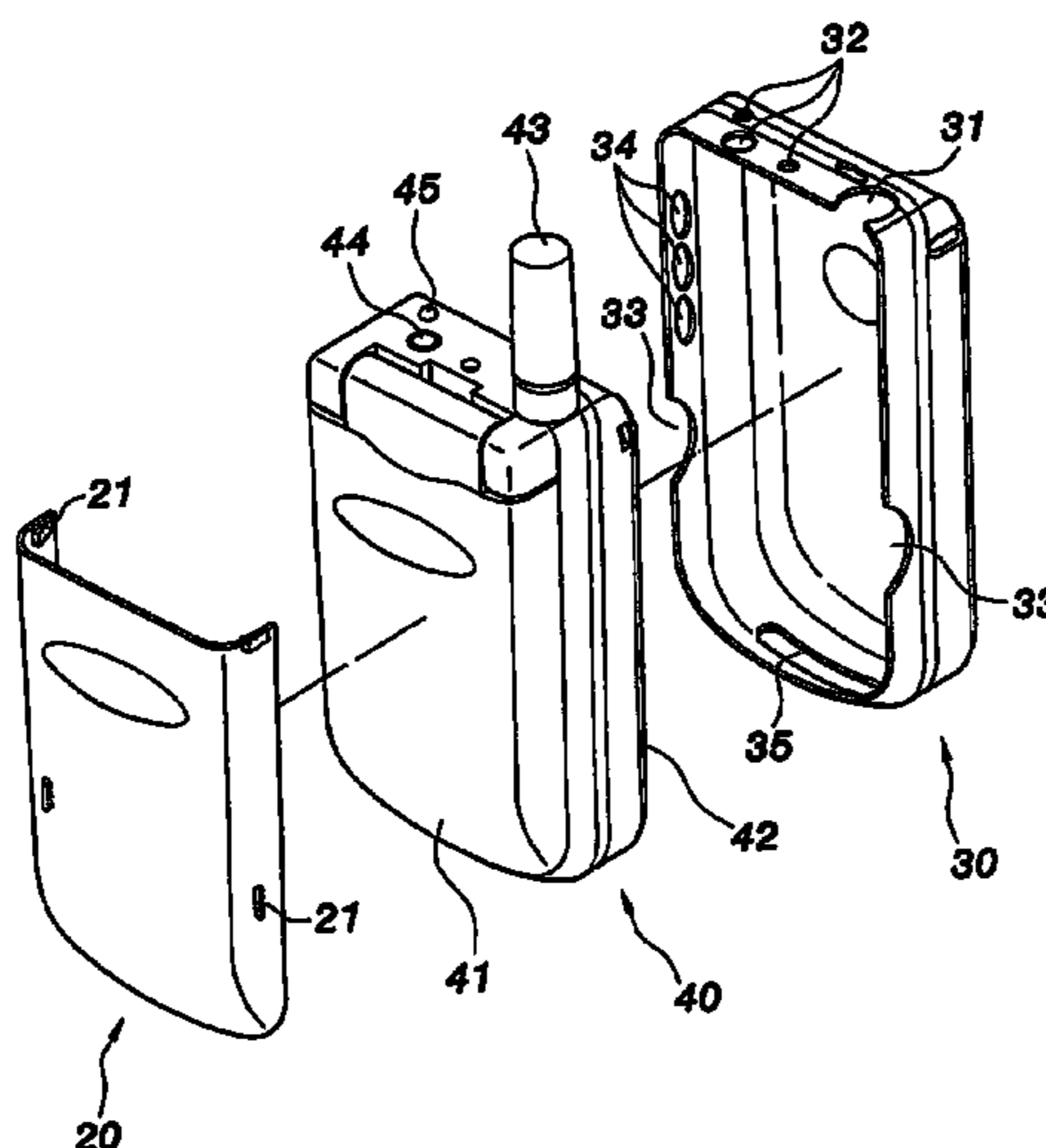
The present invention relates to a protective mask of mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies can be joined with a front and a rear phone housing of a mobile phone, respectively, to effectively prevent abrasion of the mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided. Moreover, trend and fashion of the mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

(51) **Int. Cl.**  
**H04M 1/02** (2006.01)  
**H04B 1/3888** (2015.01)

(52) **U.S. Cl.**  
CPC ..... **H04M 1/0283** (2013.01); **H04B 1/3888** (2013.01); **H04M 1/0214** (2013.01)

(58) **Field of Classification Search**  
CPC . H04W 88/02; H04M 1/0283; H04M 1/0214; H04M 1/0202; H04M 1/0212; H04M 1/0216; H04B 1/3888

**12 Claims, 7 Drawing Sheets**



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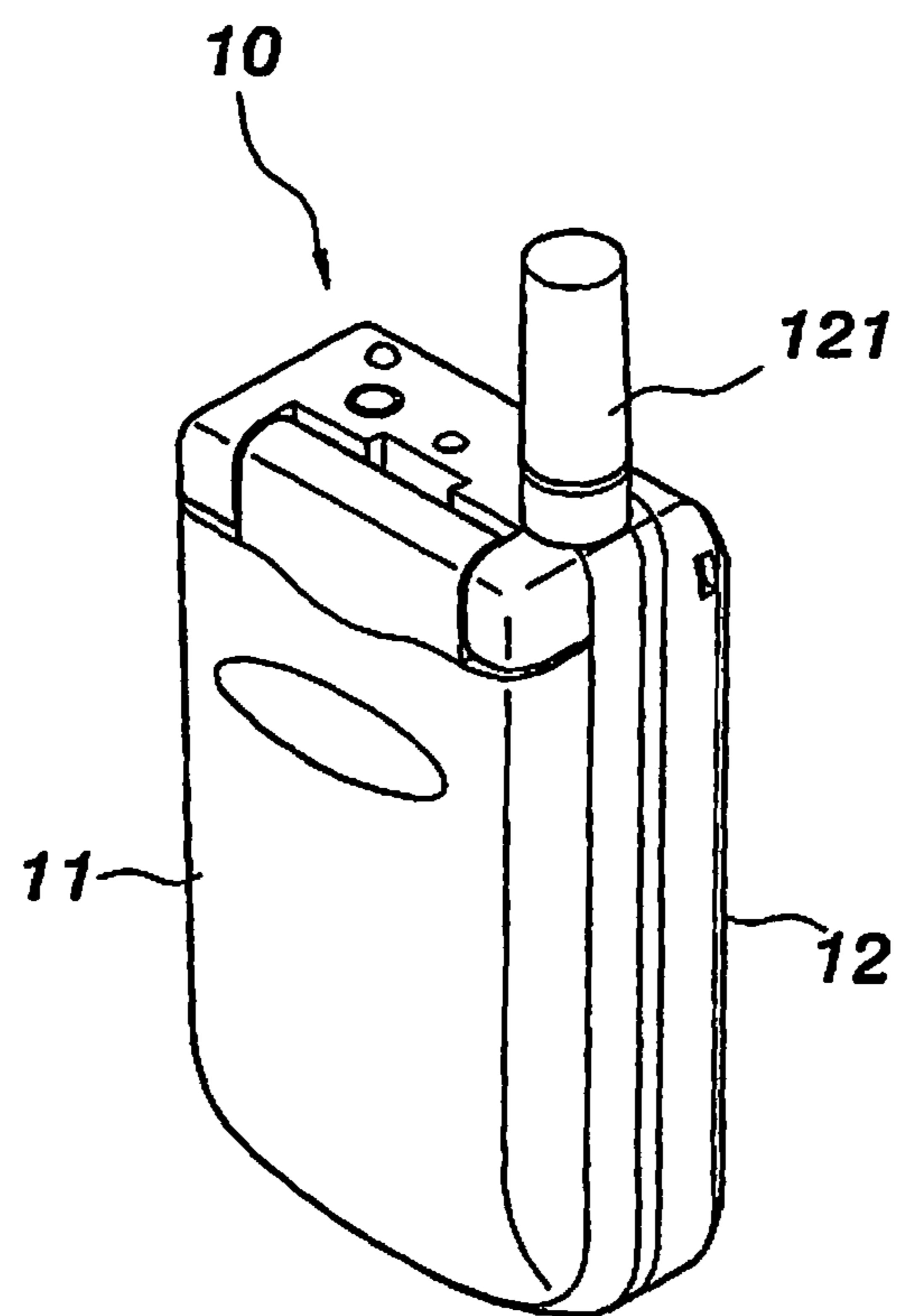
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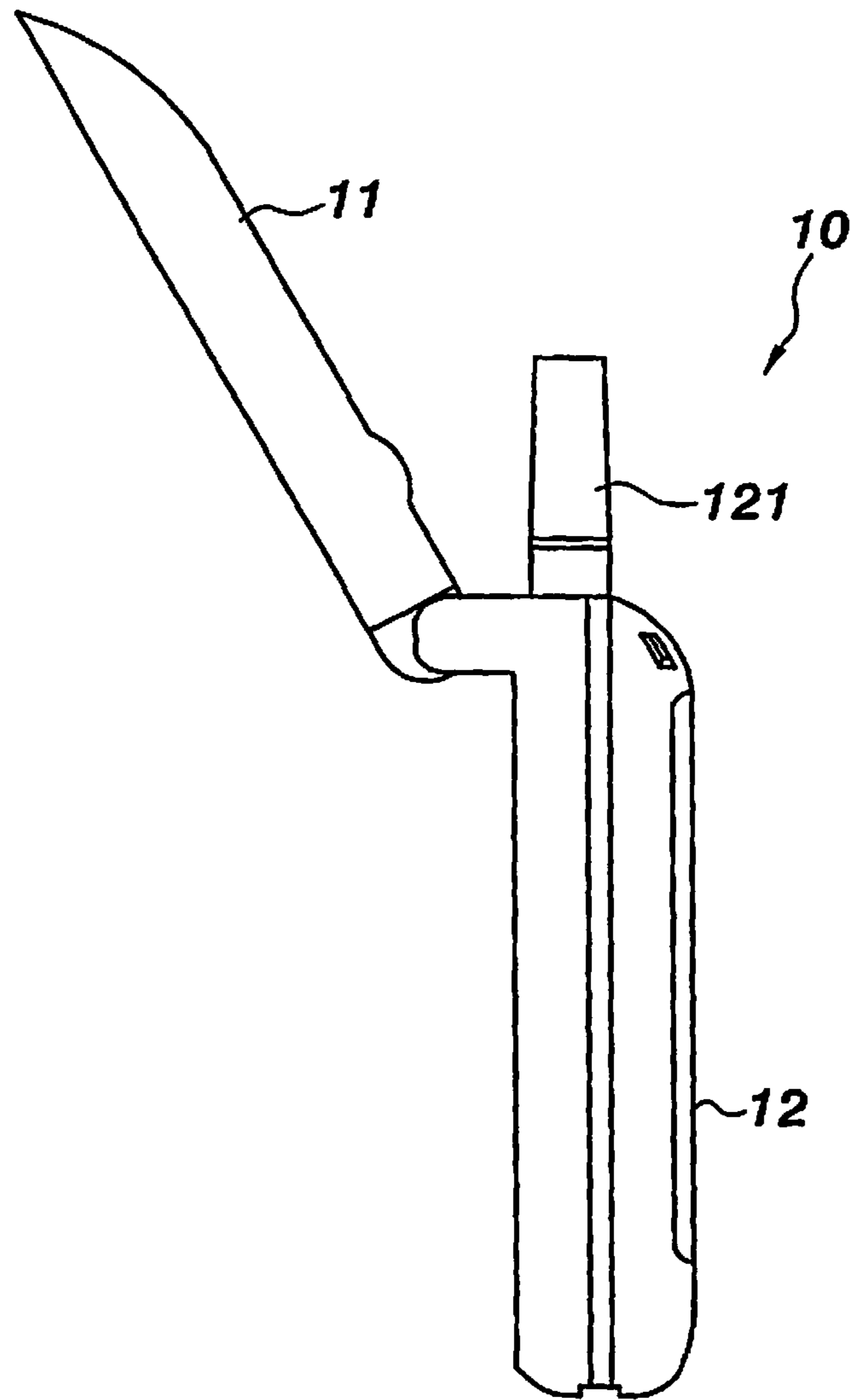
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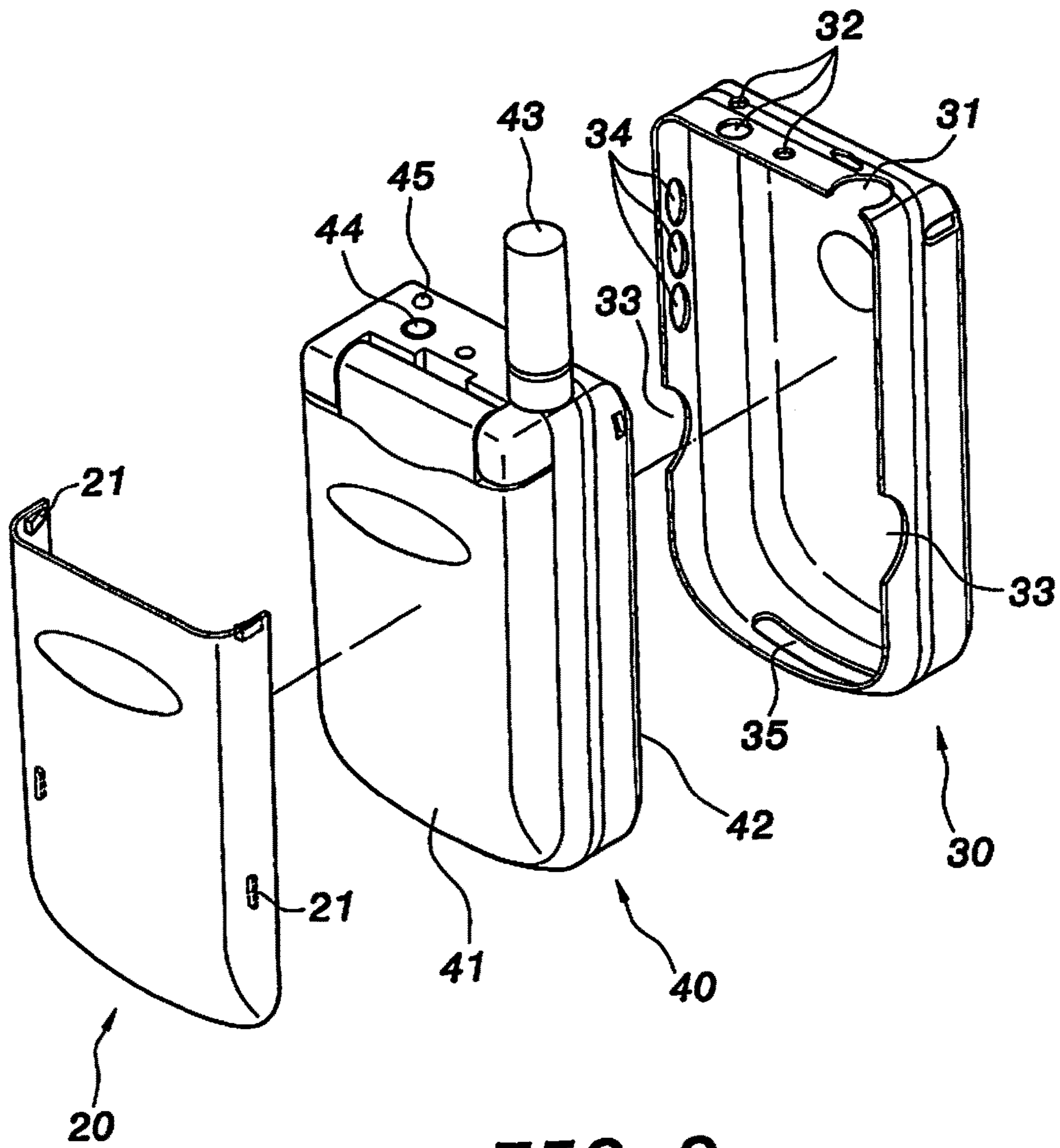


**FIG. 1**  
**PRIOR ART**

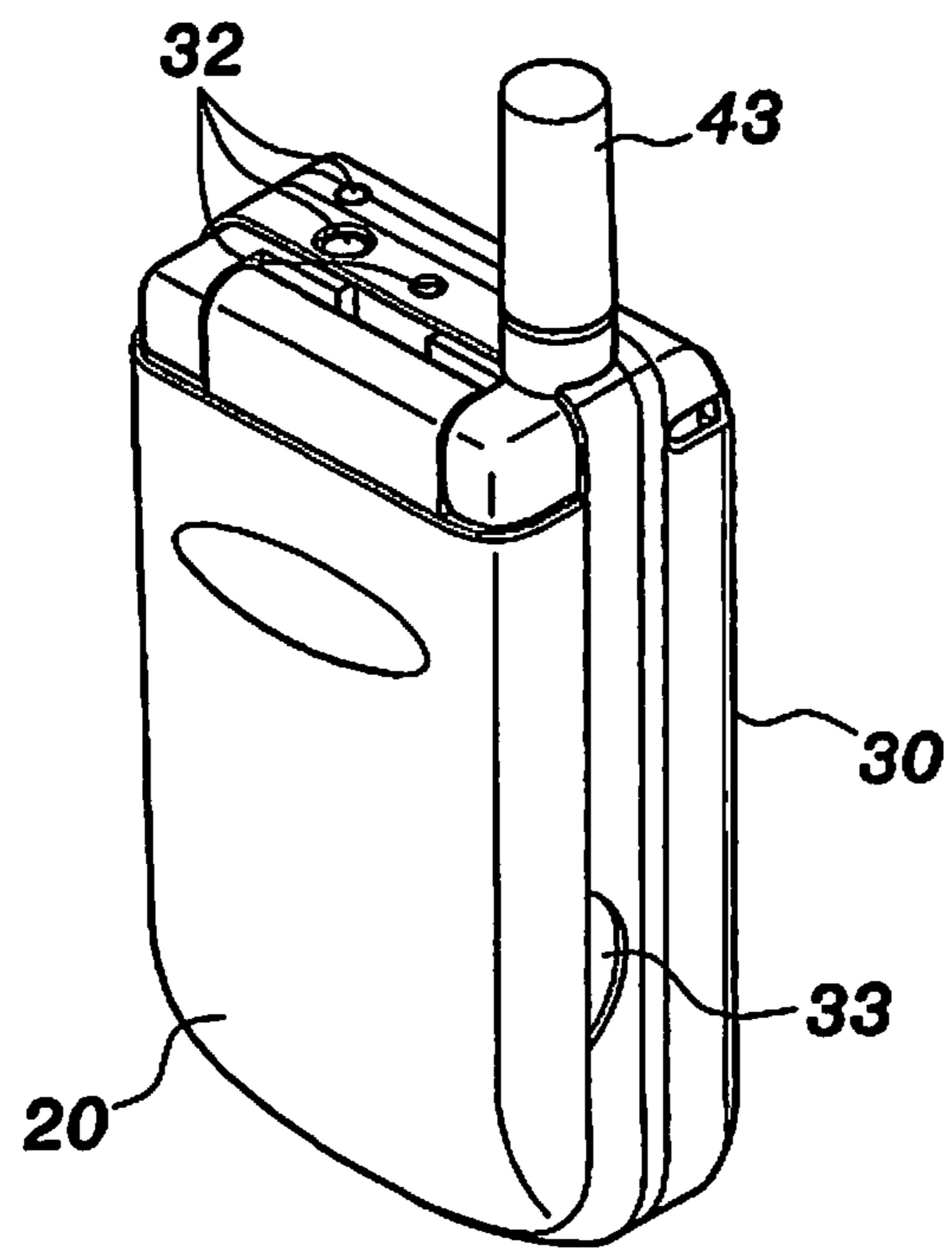




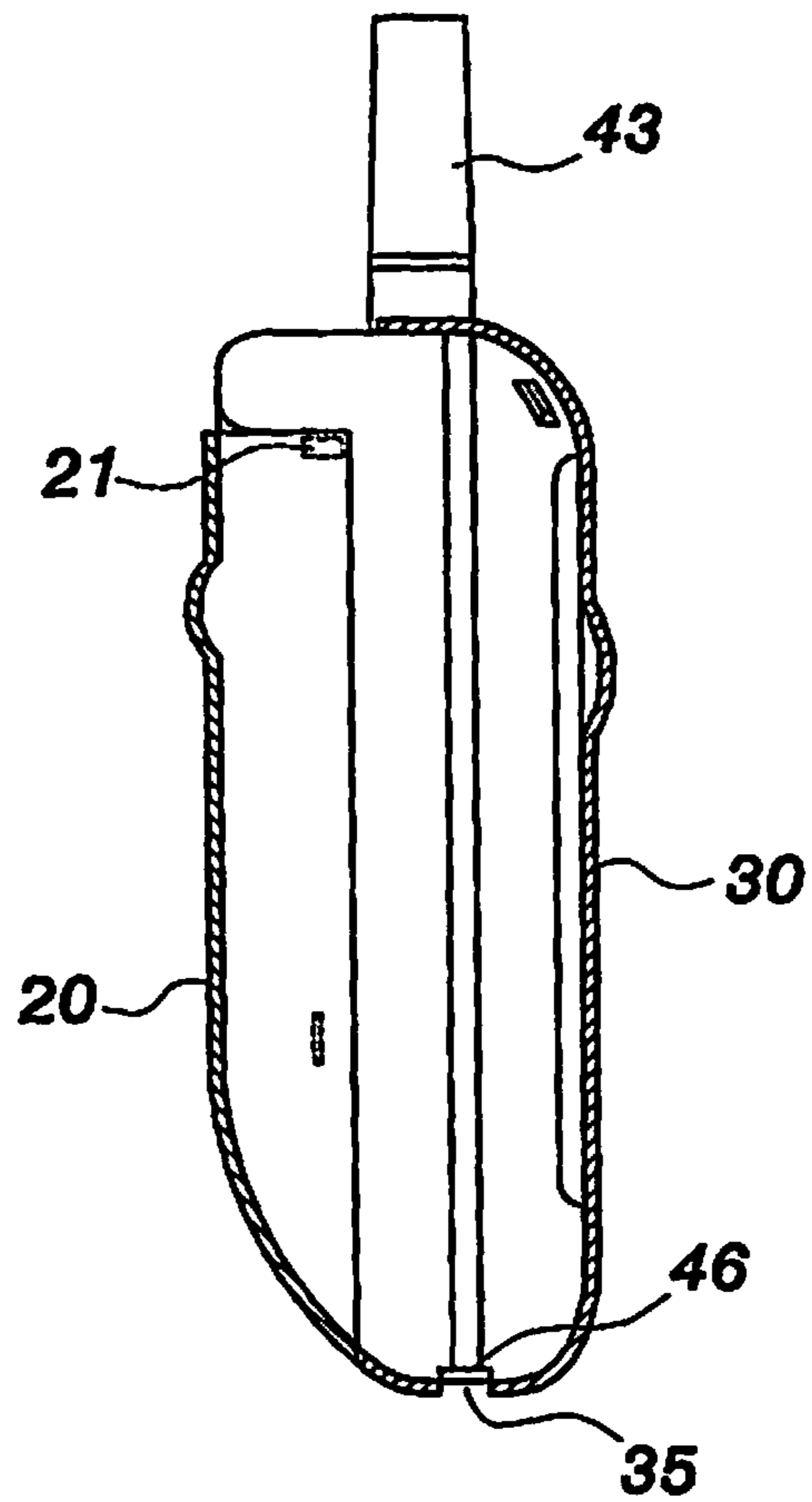
**FIG. 2**  
**PRIOR ART**



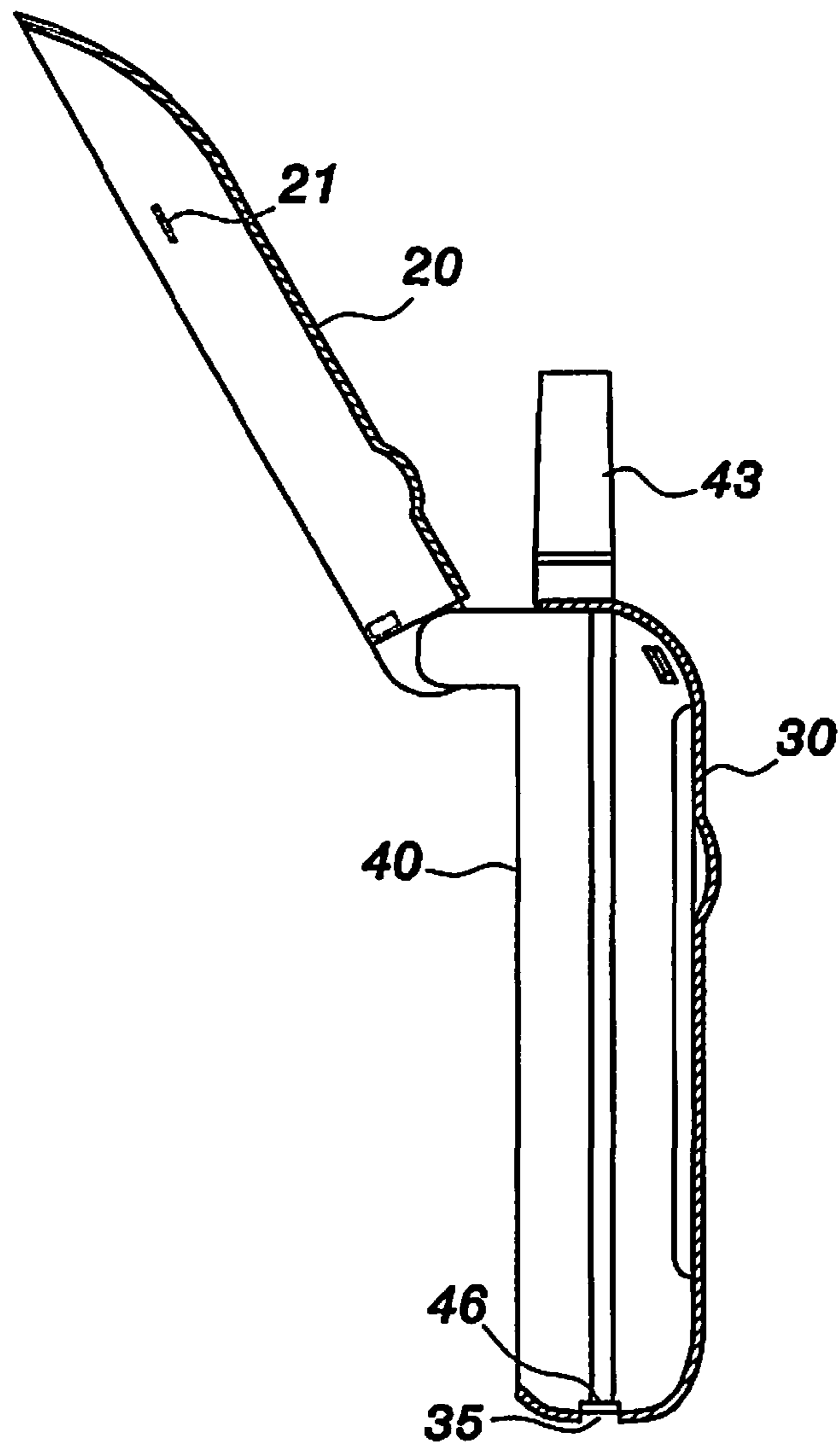
**FIG. 3**



**FIG. 4**



**FIG. 5**



**FIG. 6**

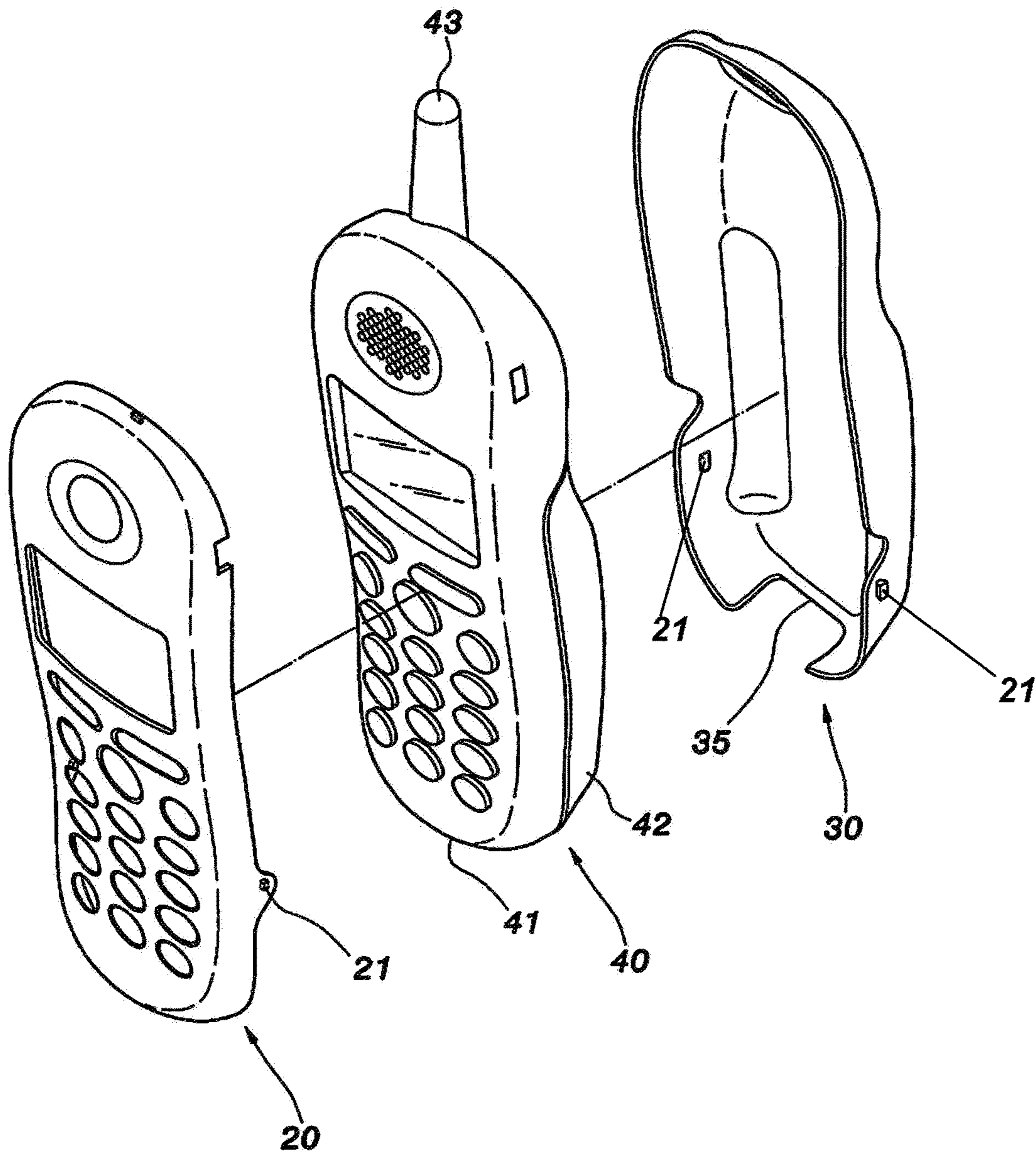


FIG. 7

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## PROTECTIVE MASK OF MOBILE PHONE

## RELATED APPLICATIONS

This application is a continuation of U.S. patent application Ser. No. 11/673,237, filed Feb. 9, 2007, now U.S. Pat. No. 7,941,195, which (i) is a continuation application of U.S. patent application Ser. No. 09/888,488, filed Jun. 26, 2001, now U.S. Pat. No. 7,194,291, and (ii) claims priority to Chinese Patent Application No. CN00252902.5, filed Nov. 17, 2000, the contents of which are incorporated herein by reference.

## FIELD OF THE INVENTION

The present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone.

## BACKGROUND OF THE INVENTION

FIGS. 1 and 2 show the structure of a prior art mobile phone. The outer look of the structure is approximately a rectangular parallelepiped comprising a front phone housing and a rear phone housing. One end of the front phone housing **11** is pivotally joined with one end of the rear phone housing **12**, as shown in FIG. 2. An antenna **121** is disposed on the rear phone housing **12**. A mobile phone **10** is formed after assembling the front and rear phone housings **11** and **12**. The mobile phone **10** can be used for receiving a call, dialing a telephone number, making a call, displaying messages, and setting functions.

However, because the front and rear phone housings **11** and **12** of the mobile phone **10** are very smooth and delicate, abrasion may easily arise due to carelessness of a user so as to generate ill-favored scars thereon, resulting in the deterioration of the quality of the mobile phone and the fall of its value.

Moreover, the design of the mobile phone **10** tends to be more and more diversified in consideration of trend and fashion. The user usually spends a lot of money to change the mobile phone **10** to adhere to the fashion, resulting in waste of money.

Accordingly, the above mobile phone structure has inconvenience and drawbacks in practical installation and use. The present invention aims to resolve the problems in the prior art.

## SUMMARY OF THE INVENTION

The primary object of the present invention is to provide a protective mask of mobile phone to effectively prevent abrasion of a mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided.

The secondary object of the present invention is to provide a protective mask of mobile phone so that trend and fashion of a mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

To achieve the above objects, the present invention provides a protective mask for a mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies are integrally formed by means of mold ejection of plastic. Patterns, types, or nameplates can be

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printed on the upper and lower cover bodies. The upper and lower cover bodies can sheathe a mobile phone therein. A gap, cavities, and slots corresponding to an antenna, an earphone cavity, an incoming-call informing light and so on of the mobile phone are disposed on the lower cover body so that a user can successfully receive a call and use various kinds of functions and settings of the mobile phone.

The various objects and advantages of the present invention will be more readily understood from the following detailed description when read in conjunction with the appended drawings, in which:

## BRIEF DESCRIPTION OF THE DRAWINGS

FIG. 1 is a perspective view of a prior art mobile phone; FIG. 2 is a diagram showing the use state of a prior art mobile phone;

FIG. 3 is an exploded perspective view of the present invention and a mobile phone;

FIG. 4 is a perspective view of the present invention assembled with a mobile phone;

FIG. 5 is a cross-sectional view of the present invention assembled with a mobile phone;

FIG. 6 is a diagram showing the use state of the present invention assembled **10** with a mobile phone; and

FIG. 7 is an exploded perspective view according to a second embodiment of the present invention.

## DETAILED DESCRIPTION OF PREFERRED EMBODIMENTS

As shown in FIGS. 3 to 6, the present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone. The protective mask of mobile phone of the present invention comprises an upper cover body **20** and a lower cover body **30**.

The upper cover body **20** is integrally formed by mold injection of plastic. Patterns, types, or nameplates can be printed on a front side face of the upper cover body **20**. The upper cover body **20** can be joined with a front phone housing **41** of a mobile phone **40**, as shown in FIG. 4. A rear side face of the upper cover body **20** has a plurality of flanges **21**, as shown in FIG. 3. The flanges **21** can be retained at the edge of the front phone housing **41** of the mobile phone **40**. The front phone housing **41** of the mobile phone **40** can be sheathed in the upper cover body **20**, as shown in FIG. 5.

The lower cover body **30** is integrally formed by mold injection of plastic. Patterns, types, or nameplates can be printed on the lower cover body **30**. The lower cover body **30** can be joined with a rear phone housing **42** of the mobile phone **40**, as shown in FIG. 4. The lower cover body **30** has a gap **31** to retain an antenna **43** of the mobile phone **40**, as shown in FIG. 3. A plurality of cavities **32** are disposed beside the gap **31** of the lower cover body **30**. The cavities **32** can correspond to an earphone cavity **44**, an incoming-call informing light **45** and so on of the mobile phone **40** so that a user can conveniently use the functions of the mobile phone **40**.

Finger recessions **33** are respectively disposed at two sides of the lower cover body **30** so that a user can easily unfold the pivotally joined front phone housing **41** and rear phone housing **42** to receive a call or operate the mobile phone **40**, as shown in FIG. 6. The finger recessions **33** can also let the user conveniently separate the mobile phone **40** and the lower cover body **30** for performing operations such as replacing a battery (not shown) of the mobile phone **40**.

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A plurality of holes **34** are disposed at one side of the lower cover body **30**. The holes **34** can correspond to function keys (not shown) of the mobile phone **40** so that the user can successfully receive a call or set functions.

A bottom of the lower cover body **30** has a slot **35**, which can correspond to a socket **46** (shown in FIG. **5**) of the mobile phone **40** so that a user can plug in a power supply (not shown) of the mobile phone **40** to charge or recharge the mobile phone **40**.

As shown in FIG. **7**, a different upper cover body **20** and a different lower cover body **30** are matched according to the outer look of a different mobile phone **40** so as to satisfy users having different mobile phones **40**. The connection and disposition ways are the same as the above first embodiment of the present invention.

The present invention uses the upper cover body **20** and the lower cover body **30** to sheathe the mobile phone **40** therein so as to effectively prevent abrasion of the mobile phone **40** due to the carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Moreover, trend and fashion of the mobile phone **40** can be achieved without the need of replacing the mobile phone **40**.

Although the present invention has been described with reference to the preferred embodiments thereof, it will be understood that the invention is not limited to the details thereof. Various substitutions and modifications have been suggested in the foregoing description, and others will occur to those of ordinary skill in the art. Therefore, all such substitutions and modifications are intended to be embraced within the scope of the invention as defined in the appended claims.

The invention claimed is:

**1.** A protective mask molded for frictional retention to an exterior housing of a mobile phone having user input and output interfaces, and internal components including circuitry and a battery, wherein the exterior housing completely encloses the circuitry and the battery when the mobile phone is fully assembled and ready for use, the exterior housing having an exterior shape formed by a back surface, and at least portions of opposed side surfaces, the protective mask comprising:

an integrally-formed mask body molded and contoured to conform and frictionally-fit tightly against the exterior shape of the exterior housing;

an inner surface of the integrally-formed mask body defining an interior space of the integrally-formed mask body and conforming to and in substantially continuous surface-to-surface contact with the exterior shape of the exterior housing, with no substantial space between the inner surface of the integrally-formed mask body and the exterior shape of the exterior housing;

at least one opening defined by the integrally-formed mask body permitting user access to at least the user input and output interfaces; and

at least one retainer having an extension protruding laterally inward from the integrally-formed mask body and toward and into the integrally-formed mask body interior space, wherein the at least one retainer is retained to the exterior housing at an exterior housing edge when the mask is coupled to the mobile communication device, the at least one retainer participating in retaining the integrally-formed mask body to the mobile communication device.

**2.** The protective mask of claim **1**, wherein the integrally-formed mask body further includes indicia selected from the group consisting of text, graphic elements and combinations thereof.

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**3.** The protective mask of claim **1**, wherein the integrally-formed mask body includes at least one feature opening to permit access to at least one feature of the mobile phone.

**4.** The protective mask of claim **1**, wherein the integrally-formed mask body includes a socket opening corresponding to a socket of the mobile phone and permitting a user to plug a power supply into the socket to charge the mobile phone.

**5.** A protective mask molded for frictional retention to an exterior housing of, and adapted to be coupled to, a mobile communication device having internal components including circuitry and a battery, wherein the exterior housing completely encloses the circuitry and battery when the mobile communication device is fully assembled and ready for use, and wherein the exterior housing has an exterior shape including a back face and at least portions of opposed side surfaces, the protective mask comprising:

an integrally-formed mask body molded and contoured to conform and frictionally fit to the exterior shape of the exterior housing;

an inner surface of the integrally-formed mask body defining an interior space of the integrally-formed mask body and conforming to and in substantially continuous surface-to-surface contact with the exterior shape of the exterior housing in overlying and protecting relationship, without a substantial gap between the inner surface of the integrally-formed mask body and the exterior shape of the exterior housing, the integrally-formed mask body defining an opening enabling the mask to be placed over the exterior shape in overlying and protecting relationship; and

at least one retainer having an extension protruding laterally inward from the integrally-formed mask body and toward and into the integrally-formed mask body interior space, wherein the at least one retainer is retained to the exterior housing at an exterior housing edge when the mask is coupled to the mobile communication device, the at least one retainer participating in retaining the integrally-formed mask body to the mobile communication device.

**6.** The protective mask of claim **5**, wherein the mobile communication device includes a socket for battery charging and the integrally-formed mask body defines at least a battery-charging socket opening permitting a power supply to be connected to the socket.

**7.** The protective mask of claim **5**, wherein the mobile communication device includes an earphone-connection socket and the integrally-formed mask body defines at least one earphone-connection socket opening permitting an earphone to be connected to the earphone-connection socket.

**8.** A mask for attachment to a hand-held mobile phone, the mobile phone having user input and output interfaces, internal components including circuitry and a battery, and an exterior housing completely enclosing the circuitry and battery when the mobile phone is fully assembled and ready for use, the exterior housing including a first face, a second face and opposed side surfaces there between, the mask comprising:

an integrally-formed mask body molded to conform to a shape of the exterior housing; and

inner and outer surfaces, the surfaces defining at least one opening in the integrally-formed mask body providing access to at least one of the user input and output interfaces, the integrally-formed mask body being configured such that, when the mask is attached to the mobile phone, the integrally-formed mask body is coextensive with, contours to and overlies the opposed



## US 10,097,676 B2

5

side surfaces, with substantially no space between the mask body and the opposed side surfaces; and at least one retainer having an extension protruding laterally inward from the integrally-formed mask body and toward and into the integrally-formed mask body interior space, wherein the at least one retainer is retained to the exterior housing at an exterior housing edge when the mask is coupled to the mobile communication device, the at least one retainer participating in retaining the integrally-formed mask body to the mobile communication device.

**9.** A protective mask molded for frictional retention to an exterior housing of a fully assembled mobile communication device having user input and output interfaces, the mobile communication device further having internal components including circuitry and a battery completely enclosed by the exterior housing, and the exterior housing having an exterior shape formed by a back surface and at least portions of opposed side surfaces, the protective mask comprising:

an inner surface closely conforming to the exterior shape of the exterior housing and in substantially continuous surface-to-surface contact with the exterior shape of the exterior housing, with substantially no space between the inner surface of the protective mask and the exterior shape when the protective mask is retained to the exterior housing, the protective mask being molded, integrally formed, contoured and sized to fit tightly

6

against the exterior shape of the exterior housing, thereby providing retention of the protective mask to the exterior housing;

at least one opening defined by the protective mask permitting user access to at least the user input and output interfaces; and

at least one retainer having an extension protruding laterally inward from the integrally-formed mask body and toward and into the integrally-formed mask body interior space, wherein the at least one retainer is retained to the exterior housing at an exterior housing edge when the mask is coupled to the mobile communication device, the at least one retainer participating in retaining the integrally-formed mask body to the mobile communication device.

**10.** The protective mask of claim **9**, wherein the protective mask further includes indicia selected from the group consisting of text, graphic elements and combinations thereof.

**11.** The protective mask of claim **9**, wherein the protective mask includes at least one feature opening to permit access to at least one feature of the mobile communication device.

**12.** The protective mask of claim **9**, wherein the protective mask includes a socket opening corresponding to a socket of the mobile communication device, permitting a user to plug a power supply into the socket to charge the mobile communication device.

\* \* \* \* \*

# **EXHIBIT D**

**TO**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**Accused Products**

**MOBILE DEVICE CASE STYLES**

**Main Sources:**

**<https://vrsdesign.com/> and hover over “Phone”**

**<https://vrsdesign.com/collections/sand-stone-collection>**

**<https://vrsdesign.com/collections/groove>**



**<https://vrsdesign.com/> and hover over “VRS Outlet” and click “APPLE IPHONES”**


**<https://vrsdesign.com/> and hover over “VRS Outlet” and click “SAMSUNG GALAXY”**

Case Style Name	Exemplary Photographs	Source for Photograph
Crystal Bumper		<p><a href="https://vrsdesign.com/collections/crystal-bumper-series/products/galaxy-note-9-case-crystal-bumper-series">https://vrsdesign.com/collections/crystal-bumper-series/products/galaxy-note-9-case-crystal-bumper-series</a></p>
Crystal Chrome Clear		<p><a href="https://vrsdesign.com/collections/vrs-outlet-apple/products/iphone-xs-max-case-crystal-chrome-series">https://vrsdesign.com/collections/vrs-outlet-apple/products/iphone-xs-max-case-crystal-chrome-series</a></p>
Crystal Fit (Crystal Fit Label)		<p><a href="https://vrsdesign.com/collections/vrs-outlet-apple/products/iphone-ix-case-crystal-fit-label-series">https://vrsdesign.com/collections/vrs-outlet-apple/products/iphone-ix-case-crystal-fit-label-series</a></p>

Case Style Name	Exemplary Photographs	Source for Photograph
Crystal Mixx Pro		<p><a href="https://vrsdesign.com/products/iphone-12-pro-case-crystal-mixx-pro">https://vrsdesign.com/products/iphone-12-pro-case-crystal-mixx-pro</a></p>
<p>Damda (Damda Crystal Fit, Damda Crystal Mixx, Damda Folder, Damda Glide, Damda Glide Hybrid, Damda Glide Pro, Damda Glide Shield, Damda Glide Shield Gradient, Damda Glide Shield New, Damda Glide Shield Winter Edition, Damda High Pro Shield, Damda Shield, Damda Shield Gradient, Damda Single Fit, Damda Slate) (including Sand Stone, Groove and NASA Series)</p>		<p><a href="https://vrsdesign.com/products/galaxy-s20-case-damda-glide-pro">https://vrsdesign.com/products/galaxy-s20-case-damda-glide-pro</a></p> <p><a href="https://vrsdesign.com/products/galaxy-z-flip-case-damda-slate">https://vrsdesign.com/products/galaxy-z-flip-case-damda-slate</a></p> <p>(See also Exhibit E)</p> <p><a href="https://vrsdesign.com/collections/nasa-collection/products/iphone-12-pro-max-case-damda-glide-pro-nasa">https://vrsdesign.com/collections/nasa-collection/products/iphone-12-pro-max-case-damda-glide-pro-nasa</a></p>

Case Style Name	Exemplary Photographs	Source for Photograph
<p>Genuine Leather (Genuine Leather Diary)</p>		<p><a href="https://vrsdesign.com/collections/genuine-leather-cases/products/iphone-11-pro-case-genuine-leather-diary">https://vrsdesign.com/collections/genuine-leather-cases/products/iphone-11-pro-case-genuine-leather-diary</a></p>
<p>Hard Drop (Hard Drop Active)</p>		<p><a href="https://vrsdesign.com/products/galaxy-z-fold-3-case-hard-drop">https://vrsdesign.com/products/galaxy-z-fold-3-case-hard-drop</a></p> <p>(See also Exhibit E)</p>
<p>Layered Dandy (Layered Dandy Deluxe)</p>		<p><a href="https://vrsdesign.com/collections/layered-dandy-series/products/iphone-xs-max-case-layered-dandy-series">https://vrsdesign.com/collections/layered-dandy-series/products/iphone-xs-max-case-layered-dandy-series</a></p>

Case Style Name	Exemplary Photographs	Source for Photograph
<p>QuickStand (Damda QuickStand, Damda QuickStand Pro, MagStand Pro, Quick Stand Active, Quick Stand Active S, QuickStand Modern, Quick Stand Modern Pro, Quick Stand Pro, Quick Strand Modern, QuickStand Active, Quickstand Active Multi Clip, QuickStand Pro, QuickStand Pro Clear, QuickStand Pro for MagSafe) (including Sand Stone Series)</p>		<p><a href="https://vrsdesign.com/products/iphone-12-pro-max-case-damda-quickstand">https://vrsdesign.com/products/iphone-12-pro-max-case-damda-quickstand</a></p> <p><a href="https://vrsdesign.com/collections/galaxy-z-flip-3/products/galaxy-z-flip-3-case-quickstand-active-multi-clip">https://vrsdesign.com/collections/galaxy-z-flip-3/products/galaxy-z-flip-3-case-quickstand-active-multi-clip</a></p> <p>(See also Exhibit E)</p>
<p>Saffiano Diary</p>		<p><a href="https://vrsdesign.com/collections/ipad/products/ipad-pro-9-7-case-saffiano-diary-series">https://vrsdesign.com/collections/ipad/products/ipad-pro-9-7-case-saffiano-diary-series</a></p>

Case Style Name	Exemplary Photographs	Source for Photograph
<p>Terra Guard (Terra Guard Active, Terra Guard Active Multi Clip, Terra Guard Active Pro, Terra Guard Crystal, Terra Guard Modern, Terra Guard Multi Clip, Terra Guard S, Terra Guard Ultimate, Terra Guard Ultimate Go, Terra Guard Ultimate Go S)</p>		<p><a href="https://vrsdesign.com/products/galaxy-z-fold-4-5g-case-terra-guard-modern">https://vrsdesign.com/products/galaxy-z-fold-4-5g-case-terra-guard-modern</a></p> <p>(See also Exhibit E)</p> <p><a href="https://vrsdesign.com/products/google-pixel-6-pro-case-terra-guard">https://vrsdesign.com/products/google-pixel-6-pro-case-terra-guard</a></p>

**MOBILE DEVICE MODELS FOR WHICH THERE ARE ACCUSED PRODUCTS**

**Apple: <https://vrsdesign.com/collections/iphone>**

iPhone 14 Pro Max	iPhone 12 Pro	iPhone XR
iPhone 14 Pro	iPhone 12	iPhone 8 Plus
iPhone 14 Plus	iPhone 12 Mini	iPhone 7 Plus
iPhone 14	iPhone 11 Pro Max	iPhone 8
iPhone 13 Pro Max	iPhone 11 Pro	iPhone 7
iPhone 13 Pro	iPhone 11	iPhone SE 3 (2022)
iPhone 13	iPhone XS Max	iPhone SE 2 (2020)
iPhone 13 Mini	iPhone XS	iPad 9.7
iPhone 12 Pro Max	iPhone X	

**Google: <https://vrsdesign.com/collections/google-pixel-7-series> and <https://vrsdesign.com/collections/pixel-6-pro>**

Google Pixel 7 Pro	Google Pixel 6 Pro
Google Pixel 7	Google Pixel 6

**Samsung: <https://vrsdesign.com/collections/samsung>**

Galaxy Z Fold 4 (See also Exhibit E)	Galaxy Z Flip (See also Exhibit E)	Galaxy S8 Plus
Galaxy Z Fold 4 5G (See also Exhibit E)	Galaxy S22 Ultra	Galaxy S8
Galaxy Z Fold 3 (See also Exhibit E)	Galaxy S22 Plus	Galaxy S7 Edge
Galaxy Z Fold 3 5G (See also Exhibit E)	Galaxy S22	Galaxy Note 20 Ultra
Galaxy Z Fold 2 (See also Exhibit E)	Galaxy S21 FE	Galaxy Note 20
Galaxy Z Flip 4 (See also Exhibit E)	Galaxy S21 Ultra	Galaxy Note 10 Plus
Galaxy Z Flip 3 (See also Exhibit E)	Galaxy S21 Plus	Galaxy Note 10
	Galaxy S21	Galaxy Note 9
	Galaxy S20 Ultra	Galaxy Note 8
	Galaxy S20 Plus	Galaxy Note 5
	Galaxy S20	Galaxy A72
	Galaxy S9 Plus	Galaxy A52
	Galaxy S9	



iPhone 12 Pro Max Case Damda QuickStand – Black Black

<https://vrsdesign.com/products/iphone-12-pro-max-case-damda-quickstand>

<https://www.amazon.com/VRS-Design-QuickStand-Compatible-iPhone/dp/B08KSLC51J/>







**Handy Quick stand function**

Conveniently snap open and close the kickstand semi-automatically with the spring installed inside the case.



**Soft button sensitivity**

Precise and ergonomic button cutouts ensure easy access and responsive touch sensitivity.

### Detailed standing angle

With the Quickstand best angled ergonomically calculated by VRS Design, watch your favorite entertainment from the best viewing position.



### Screen Protection

Complete all around protection on your Cameras and front screen with firmly raised edges.

**Perfect fit.**

Precise and ergonomic button cutouts ensure easy access and responsive touch sensitivity.





**Screen Protection**

Complete all around protection on your Camera and front screen with firmly raised edges.



**Soft button sensitivity**

Precise and ergonomic button cutouts ensure easy access and responsive touch sensitivity.



**Detailed standing angle**

With the adjustable best angled ergonomically calculated by VRS Design, watch your favorite entertainment from the best viewing position.



**Perfect fit.**

Precise and ergonomic button cutouts ensure easy access and responsive touch sensitivity.



**Wireless Charger Compatible**

Designed to work with most wireless chargers.

VRS DESIGN













Galaxy Z Flip 3 Case QuickStand Active Multi Clip – Metal Black

<https://vrsdesign.com/collections/galaxy-z-flip-3/products/galaxy-z-flip-3-case-quickstand-active-multi-clip>

<https://www.amazon.com/VRS-Design-QuickStand-Kickstand-Compatible/dp/B06XB82P7F>

(See also Exhibit E)



### CONVENIENT KICKSTAND

A daily convenient solid kickstand case freely mounts your Z Flip 3 horizontally and vertically even when fully open.



### PERFECT FIT

Designed with ergonomic details to snap fit perfectly.





## VERSATILE CHANGE OF DIRECTION

Offering 360 degree angle adjustment for utmost convenience.



## STANDARD MODE



Super portable case that offers convenient easy access to your device at all times.

## ACTIVE MODE



Heavy duty protective case designed to withstand intense athletic movements.

### HINGE COVER

VRS exclusive drop shock and daily scratch preventive hinge protection offers flawless open and close movements with a luxurious finish all around.



### SCREEN PROTECTION

Complete all around protection on your Cameras and front screen with firmly raised edges.







# GALAXY Z FLIP 3 QUICK STAND ACTIVE MULTICLIP

  
**ANTI SHOCK**  
Resistant to  
accidental drops

  
**PREMIUM**  
Made with  
high quality materials

  
**PROTECT**  
Provides maximum  
protection





**CONVENIENT KICKSTAND**  
A flip cover with kickstand and handy mounts over 2 to 3 horizontally, and vertically when fully open.



**PERFECT FIT**  
Designed with ergonomic details to snap fit perfectly.

**VERSATILE CHANGE OF DIRECTION**  
Offering 360-degree angle adjustment for utmost convenience.

<p><b>STANDARD MODE</b></p>  <p>Racer profile cover that offers convenient easy access to your device at all times.</p>	<p><b>ACTIVE MODE</b></p>  <p>Heavy duty protection cover designed to withstand bumps, shocks, movements.</p>
--	--

**HINGE COVER**  
VRS exclusive design with extra ICASP prevents hinge protection offers 360-degree open and close movements with a lockable hinge all around.




iPhone 12 Pro Max Case Damda Glide Pro NASA – Black

<https://vrsdesign.com/collections/nasa-collection/products/iphone-12-pro-max-case-damda-glide-pro-nasa>





SIMPLE SOPHISTICATION

**DAMDA  
GLIDE PRO.**  
\_NASA SERIES



Everything is Design.  
We Design  
Everything.



VRS DESIGN

Galaxy Z Fold 4 5G Case Terra Guard Modern – Mint

<https://vrsdesign.com/products/galaxy-z-fold-4-5g-case-terra-guard-modern>

<https://www.amazon.com/dp/B0B6LDVVTX?smid=A39OFLCM1FUKXS>

(See also Exhibit E)



## Screen protector just in case

Our complimentary front screen protector is compatible VRS Design cases and to provide complete protection.



Experience world-class Innovation

Complete hinge coverage. First of its kind with semi-auto sliding tech.

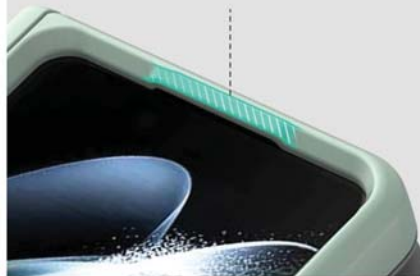


## Air Space Technology

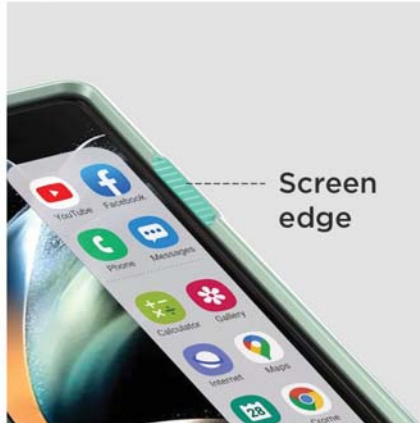
Air Space Technology allows extra corner protections by absorbing damage from **any shocks and drops**.



## Precise speaker cutout



## Screen edge



# Wireless Charger Compatible

Designed to work with most wireless chargers.

\*Wireless charger is not included.



# Smart design better quality

Excellent button touch cover designed from soft TPU that offers ultimate rugged protection with quality PC material from heavy falls and shocks.



  
**PREMIUM**  
Made with high quality materials



# Ultimate defense

Raised edges and precise cutouts will provide additional protection for your cameras and front screen.

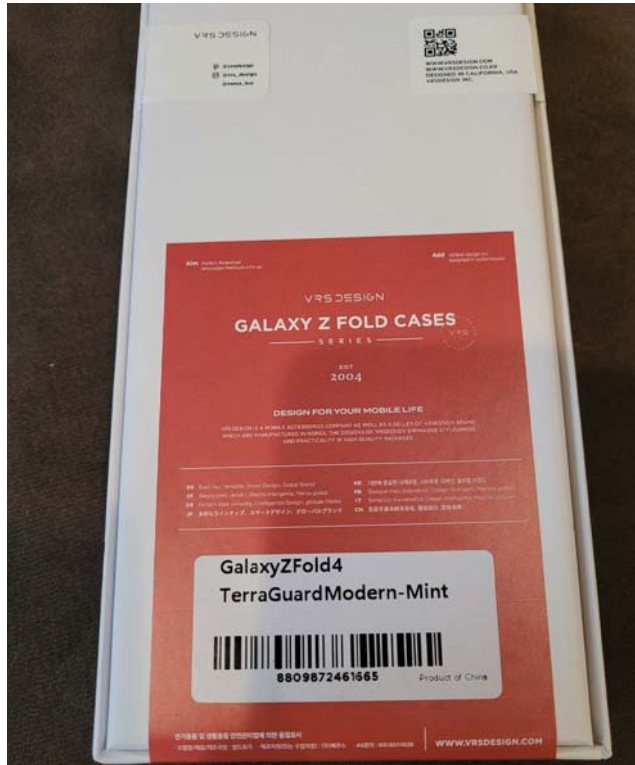


**PROTECT**

Provides maximum protection







## DOUBLE-SIDED TAPE GUIDE

양면테이프 / 케이스 부착 설명서

### Step 01 ATTACH DOUBLE-SIDED TAPE

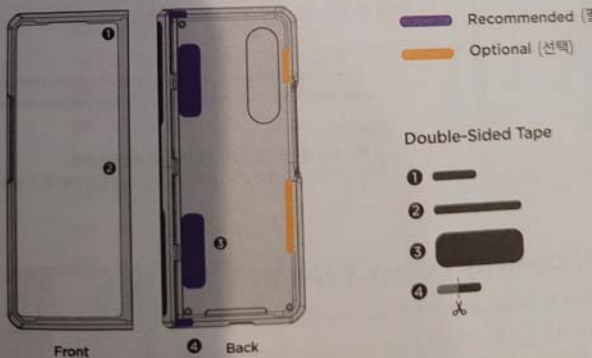
Please refer the image on the bottom, Purple part is essential, and yellow part is optional

#### 폴드 케이스 양면 테이프를 붙이는 방법

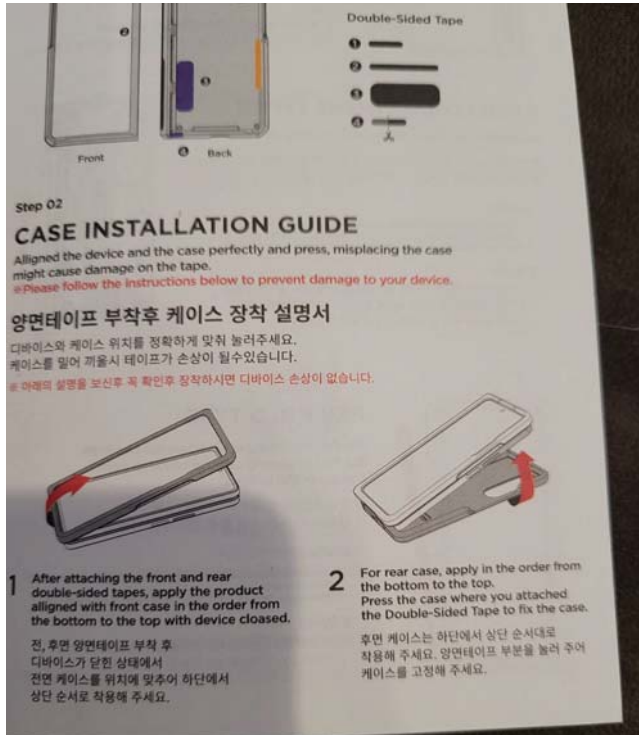
아래 그림과 같이 보라색 부분은 필수로 부착해주시고 노랑색은 선택사항으로 부착하시면 더욱 안전하게 폴드 케이스를 사용하실수 있습니다.

- Caution**
1. Using Double Sided Tape is optional.
  2. There is no residue on the device after removing Double-Sided Tapes.
  3. If the case does not hold perfectly, Please apply the Double-Sided Tapes refer to the instruction.

- 주의사항**
1. 양면 테이프 사용은 권장사항입니다.
  2. 양면 테이프 제거시 디바이스에 잔여물이 남지 않습니다.
  3. 케이스가 고정될 잘 안될시 양면테이프를 가이드와 동일하게 부착해주세요















# **EXHIBIT E**

**TO**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**Two Portion Accused Products**

**MOBILE DEVICE TWO PORTION CASE STYLES**

**Main Sources:**

**<https://vrsdesign.com/> and hover over “Phone”**


**<https://vrsdesign.com/collections/sand-stone-collection>**

**<https://vrsdesign.com/collections/groove>**

**<https://vrsdesign.com/> and hover over “VRS Outlet” and click “APPLE IPHONES”**

**<https://vrsdesign.com/> and hover over “VRS Outlet” and click “SAMSUNG GALAXY”**

Case Style Name	Exemplary Photographs	Source for Photograph
<p>Damda (Damda Slate)</p>		<p><a href="https://vrsdesign.com/products/galaxy-z-flip-case-damda-slate">https://vrsdesign.com/products/galaxy-z-flip-case-damda-slate</a></p> <p>(See also Exhibit D)</p>
<p>Hard Drop (Hard Drop Active)</p>		<p><a href="https://vrsdesign.com/products/galaxy-z-fold-3-case-hard-drop">https://vrsdesign.com/products/galaxy-z-fold-3-case-hard-drop</a></p> <p>(See also Exhibit D)</p>
<p>QuickStand (Damda QuickStand, Quick Stand Active, Quick Stand Active S, QuickStand Modern, Quick Stand Modern Pro, Quick Stand Pro, Quick Strand Modern, QuickStand Active, Quickstand Active Multi Clip, QuickStand Pro)</p>		<p><a href="https://vrsdesign.com/collections/galaxy-z-flip-3/products/galaxy-z-flip-3-case-quickstand-active-multi-clip">https://vrsdesign.com/collections/galaxy-z-flip-3/products/galaxy-z-flip-3-case-quickstand-active-multi-clip</a></p> <p>(See also Exhibit D)</p>

<b>Case Style Name</b>	<b>Exemplary Photographs</b>	<b>Source for Photograph</b>
Terra Guard (Terra Guard Active, Terra Guard Active Multi Clip, Terra Guard Active Pro, Terra Guard Modern, Terra Guard Multi Clip, Terra Guard S, Terra Guard Ultimate, Terra Guard Ultimate Go, Terra Guard Ultimate Go S)		<p><a href="https://vrsdesign.com/products/galaxy-z-fold-4-5g-case-terra-guard-modern">https://vrsdesign.com/products/galaxy-z-fold-4-5g-case-terra-guard-modern</a></p> <p>(See also Exhibit D)</p>

**MOBILE DEVICE MODELS FOR WHICH THERE ARE TWO PORTION ACCUSED PRODUCTS**

**Samsung: <https://vrsdesign.com/collections/samsung>**

Galaxy Z Fold 4 (See also Exhibit D)

Galaxy Z Fold 4 5G (See also Exhibit D)

Galaxy Z Fold 3 (See also Exhibit D)

Galaxy Z Fold 3 5G (See also Exhibit D)

Galaxy Z Fold 2 (See also Exhibit D)

Galaxy Z Flip 4 (See also Exhibit D)

Galaxy Z Flip 3 (See also Exhibit D)

Galaxy Z Flip (See also Exhibit D)

Galaxy Z Flip 3 Case QuickStand Active Multi Clip – Metal Black

<https://vrsdesign.com/collections/galaxy-z-flip-3/products/galaxy-z-flip-3-case-quickstand-active-multi-clip>

<https://www.amazon.com/VRS-Design-QuickStand-Kickstand-Compatible/dp/B06XB82P7F>

(See also Exhibit D)



### CONVENIENT KICKSTAND

A daily convenient solid kickstand case freely mounts your Z Flip 3 horizontally and vertically even when fully open.



### PERFECT FIT

Designed with ergonomic details to snap fit perfectly.





**VERSATILE CHANGE OF DIRECTION**

Offering 360 degree angle adjustment for utmost convenience.



**STANDARD MODE**



Super portable case that offers convenient easy access to your device at all times.

**ACTIVE MODE**



Heavy duty protective case designed to withstand intense athletic movements.

## HINGE COVER

VRS exclusive drop shock and daily scratch preventive hinge protection offers flawless open and close movements with a luxurious finish all around.



## SCREEN PROTECTION

Complete all around protection on your Cameras and front screen with firmly raised edges.







**GALAXY Z FLIP 3  
QUICK STAND  
ACTIVE  
MULTICLIP**



**ANTI SHOCK**  
Resistant to accidental drops

**PREMIUM**  
Made with high quality materials

**PROTECT**  
Provides maximum protection





Galaxy Z Fold 4 5G Case Terra Guard Modern – Mint

<https://vrsdesign.com/products/galaxy-z-fold-4-5g-case-terra-guard-modern>

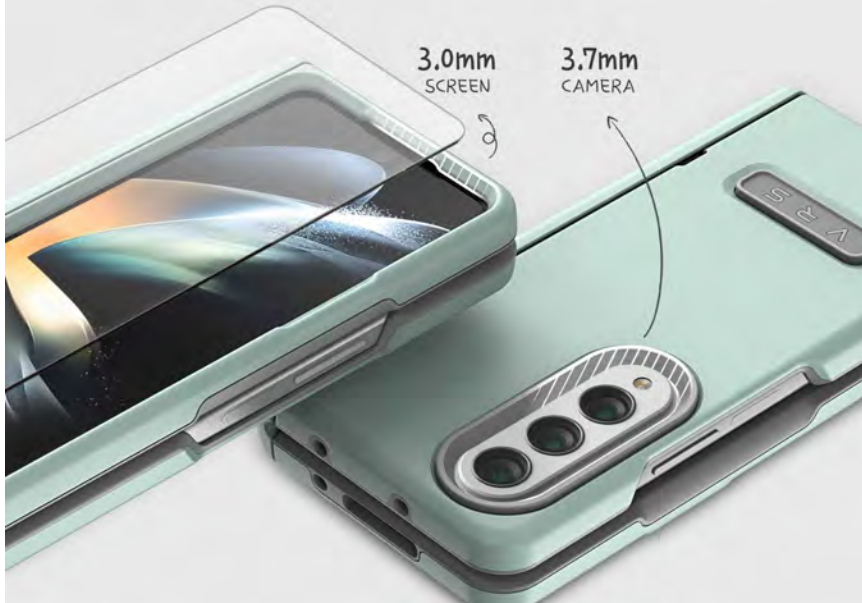
<https://www.amazon.com/dp/B0B6LDVVVTX?smid=A39OFLCM1FUKXS>

(See also Exhibit D)



## Screen protector just in case

Our complimentary front screen protector is compatible VRS Design cases and to provide complete protection.



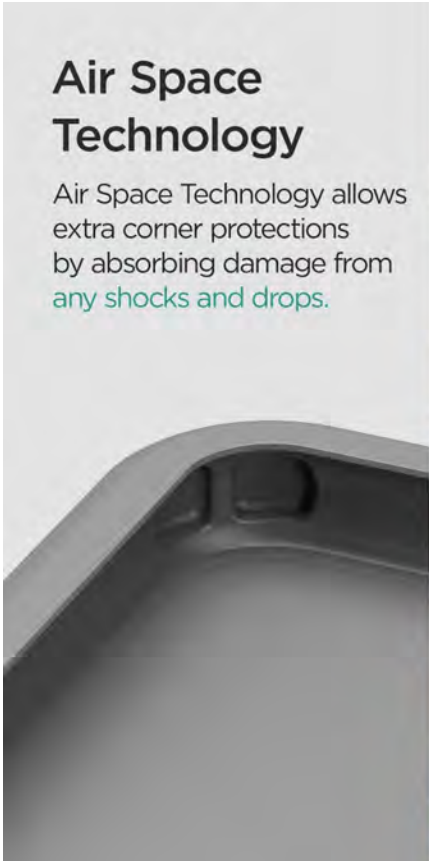
## Experience world-class Innovation

Complete hinge coverage. First of its kind with semi-auto sliding tech.



**Multi Flexibility mode**

The redesigned Hinge cover offers **most comfortable viewing angle.**

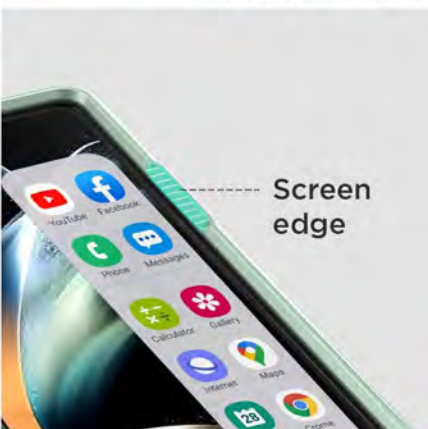


**Air Space Technology**

Air Space Technology allows extra corner protections by absorbing damage from **any shocks and drops.**



Precise speaker cutout



Screen edge

# Wireless Charger Compatible

Designed to work with most wireless chargers.

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Provides maximum protection







