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7 *Attorneys for Plaintiff*
Shenzhen Carku Technology Co., Ltd.

8
9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11
12 Shenzhen Carku Technology Co., Ltd.,
13 Plaintiff,
14 v.
15 Pilot, Inc.,
16 Defendant.

Case No. 2:22-cv-8471

**COMPLAINT FOR
DECLARATORY JUDGMENT OF
NONINFRINGEMENT**

17
18 Plaintiff Shenzhen Carku Technology Co., Ltd. (“Carku”) files this
19 Complaint seek a declaratory judgment that Plaintiff’s hand-held lithium battery-
20 powered jump starters, manufactured for and sold by its customers on the
21 Amazon.com platform and other sales channels, do not directly or indirectly
22 infringe U.S. Patent No. 11,376,971 (the “’971 patent”). which has ostensibly been
23 assigned to Defendant Pilot, Inc. (a/k/a Pilot Inc. or “Pilot”). In support of this
24 Complaint, Carku, by and through its attorneys, alleges as follows:

25 **PARTIES**

26 1. Shenzhen Carku Technology Co., Ltd. is a limited liability company
27 organized and existing under the laws of the People’s Republic of China, with a
28 principal place of business at Building A, Qixing Creative Square, Lianrun Rd.,

1 Gaofeng Community, Dalang Street, Longhua District, Shenzhen, Guangdong,
2 People’s Republic of China 518109.

3 2. On information and belief, Defendant Pilot, Inc. (“Pilot”) is a
4 corporation organized and existing under the laws of the State of California, with its
5 principal place of business at 13000 Temple Avenue, City of Industry, California
6 91746.

7 3. Pilot identifies itself as “Pilot, Inc.” in court filings such as the
8 complaint in *Pilot, Inc. v. Battery-Biz, Inc.*, No. 20-cv-10207 (C.D. Cal. Nov. 6,
9 2020). However, the corporate registration records available at
10 <https://bizfileonline.sos.ca.gov/search/business> show the corporate name as “Pilot
11 Inc.” and not “Pilot, Inc.”

12 4. Pilot identifies itself as “Pilot, Inc.” despite its corporate registered
13 name.

14 **JURISDICTION AND VENUE**

15 5. This Complaint includes a count for declaratory relief under the patent
16 laws of the United States, 35 U.S.C. §§ 1, *et seq.*

17 6. Plaintiffs seek declaratory relief under 28 U.S.C. §§ 2201 and 2202.

18 7. This Court has subject matter jurisdiction over the claims alleged in
19 this action under 28 U.S.C. §§ 1331, 1338, 1367(a), 2201, and 2202 because this
20 Court has exclusive jurisdiction over declaratory judgment claims arising under the
21 patent laws of the United States pursuant to 28 U.S.C. §§ 1331, 1338, 2201, and
22 2202.

23 8. As described in more detail below, an immediate, real, and justiciable
24 controversy exists between Pilot and Plaintiff as to whether certain portable lithium
25 polymer jump starters sold by Plaintiff and resold by Plaintiff’s direct and indirect
26 customers infringe the ’971 Patent. Because this action presents an actual
27 controversy with respect to the noninfringement of the ’971 Patent, the Court may
28 grant the declaratory relief sought under 28 U.S.C. §§ 2201-2202.

1 the clamps may be contained in the same enclosure housing the lithium battery, or
2 may be contained in an enclosure that is part of the cables and clamp assembly that
3 couples the battery power to the clamps connectable to a vehicle.

4 14. Carku designs jump starters for a variety of customers, and these
5 customers sell these jump starters through a variety of retail channels. For several
6 Carku customers, the Amazon Marketplace, through customer's online stores
7 accessible on www.Amazon.com, is the primary channel for retail sales of jump
8 starters purchased from Carku.

9 15. Pilot has moved quickly and aggressively to monetize the '971 patent
10 since it was issued on July 5, 2022. A copy of the '971 patent is attached as Exhibit
11 1. Pilot has lodged a series of infringement complaints with Amazon.com against
12 Carku's customers and distributors. Pilot has relied on overbroad interpretation of
13 claims of the '971 patent, high cost of litigation, the broad, and strategic use of the
14 leverage the Amazon.com IP infringement reporting system provides over Amazon
15 Sellers to try to generate revenue while avoiding any serious scrutiny of the '971
16 patent.

17 16. Products sold on Amazon are typically identified by an Amazon
18 Standard Identification Number ("ASIN"), which is a 10 letter/number code used
19 for listing or product-identification within Amazon's product catalog of billions of
20 items.

21 17. Though a series of delisting requests, Pilot has had the following
22 Carku-manufactured jumpstarter ASINs delisted since August 2022 by alleging
23 infringement of the '971 patent:

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ASIN	Seller	Brand and Model	PCB Number
B09CTJMLQP, B09YH5Z5TL	Shenzhenshi Daosishangmao Youxiangongsi d/b/a/ Fanttik Direct	Fanttik T8 APEX	JS-278
B09GW2NC12	Shenzhenshi Daosishangmao Youxiangongsi d/b/a/ Fanttik Direct	Fanttik T8 APEX (Deluxe Package)	JS-278
B0B9H1XS2X, B0B9H4WM6W	Shenzhenshi Daosishangmao Youxiangongsi d/b/a/ Fanttik Direct	Fanttik T8 MAX	JS-310
B0B9H1S8T6, B0B9H4WM6W	Shenzhenshi Daosishangmao Youxiangongsi d/b/a/ Fanttik Direct	Fanttik T8	JS-321
B09YNCMJ6B	Shenzhenshi Daosishangmao Youxiangongsi d/b/a/ Fanttik Direct	Fanttik T8 APEX + X8 Bundle	JS-278
B09DS1BXBF	AstroAI Corporation	AstroAI AHET118GY	CZ-118
B0B7X3KYZV	AstroAI Corporation	AstroAI AHET118TGY	CZ-118

ASIN	Seller	Brand and Model	PCB Number
B0B1ZD811K	Shenzhenshi Dianjia Technology Co., Ltd. d/b/a Yesper Direct	Yesper Armor	JS-317 / JS-271
B09ZNX667J	Shenzhenshi Dianjia Technology Co., Ltd. d/b/a Yesper Direct	Yesper Armor	JS-317A / JS-271A
B09Y8YFT4R, B09ZNW6WJ5, B09ZP4JF5K	Shenzhenshi Dianjia Technology Co., Ltd. d/b/a Yesper Direct	Yesper Armor Pro	JS-316A / JS-271
B09PZYR2M1	Shenzhenshi Dianjia Technology Co., Ltd. d/b/a Yesper Direct	YJS15	CC-209A
B09Q122RYG	Shenzhenshi Dianjia Technology Co., Ltd. d/b/a Yesper Direct	YJS20	CC-209A
B09Q15SPZJ	Shenzhenshi Dianjia Technology Co., Ltd. d/b/a Yesper Direct	YJS40	CC-209A
B09XTZ6KLF	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT3000	JS-271A
B084YQSVZ6, B09HJH1S41	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GP4000	CC-209A
B08CXMS19H, B092M62DG1	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GE1200	CC-209A

ASIN	Seller	Brand and Model	PCB Number
B09HYVM6ZT, B09288N1RQ	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GP2000	CC-209A
B09FP4P6BR	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GE1200	CC-209A
B08CC1GYR1, B08XW34774, B08V8BLJLL	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT1500	CC-209A
B09CPV8GJY	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT3000	JS-271A
B09M9HQG73	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT4000S	JS-271B / JS-271A
B09CPXRKLT	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT4000	JS-271
B09FSFXBLC	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GE1200/GT1500 Bundle	CC-209A
B09FSC1HB5	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GE1200/GT1500 Bundle	CC-209A
B0972784VF	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT1500 Bundle	CC-209A
B0974LM2XB	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GE1200/GT1500 Bundle	CC-209A

ASIN	Seller	Brand and Model	PCB Number
B0974LP19P	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GE1200/GT1500 Bundle	CC-209A
B0B3DNJCYM	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT4000S Bundle	JS-271B / JS-271A
B0B5H12716	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT4000S Bundle	JS-271B / JS-271A
B09QQ8WWZF	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	GP2000 + S6 Bundle	CC-209A
B09QPQ15DM	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	GP2000 + S6 Bundle	CC-209A
B07KZSBL54, B07QMQYWJP	AUTOGEN Technology Co., Ltd. d/b/a Autogen US Direct	Autogen MJS111B	CC-209A
B07CMQVWR9, B09WVVHWGF	AUTOGEN Technology Co., Ltd. d/b/a Autogen US Direct	Autogen MJS111	CC-209A
B08QTQRN8G	AUTOGEN Technology Co., Ltd. d/b/a Autogen US Direct	Autogen MJS70W	CC-209A
B08QTP44HM	AUTOGEN Technology Co., Ltd. d/b/a Autogen US Direct	Autogen MJS60W	CC-209A

ASIN	Seller	Brand and Model	PCB Number
B07J9PTCZS	AUTOGEN Technology Co., Ltd. d/b/a Autogen US Direct	Autogen MJS103B	CC-209
B09XTY3JYT	Shenzhenshi futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN V700	CC-209
B09T94QKMS	Shenzhenshi futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN V150	CC-209
B09R6S71JH	Shenzhenshi futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN V32	CC-209
B0B2CRVFFD, B09G5WC4TD	Shenzhenshi futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN VX1	CC-209A
B0B12C7GNC, B0B12HGNMV	Shenzhenshi futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN V8	CC-209
B09XB8FFX5	ChangShaHongMaoKai KeJiYouXianGongSi d/b/a TopdonStarter	TOPDON JS3000	CC-209 / CC-209A
B09GLPBKXR	ChangShaHongMaoKai KeJiYouXianGongSi d/b/a TopdonStarter	TOPDON JS2000	CC-209 / CC-209A

ASIN	Seller	Brand and Model	PCB Number
B09CTZHG9Q	ChangShaHongMaoKai KeJiYouXianGongSi d/b/a TopdonStarter	TOPDON JS1200	CC-209 / CC-209A
B08MTJFGDW	Hangzhou Hangmao Technology Co., Ltd. d/b/a/ SUNPOW Chain Store	SUNPOW SP- JS02	CC-209A
B08MDYKRBS	Hangzhou Hangmao Technology Co., Ltd. d/b/a/ SUNPOW Chain Store	SUNPOW SP- JS01	CC-209A
B09N37C4LG	Guangzhou Sihao Trading Co., Ltd d/b/a Snailhome	Audewdirect Epower-155	CC-209A
B09LXPX5YK	Guangzhou Sihao Trading Co., Ltd d/b/a Snailhome	Audewdirect Epower-146B	CC-209
B09MQM523V	Guangzhou Sihao Trading Co., Ltd d/b/a Snailhome	Audewdirect Epower-172	CC-209A
B09TL1LPGM, B09TL32F13, B09TL1BBTZ	Shenzhenshi houqiandingmaiyyou xiangongsi d/b/a ENGiNDOT Direct	ENGiNDOT T8	CC-209
B09W5SFK6L, B09W5V5T3T	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Powrun P-ONE	CC- 209/CC- 209A

ASIN	Seller	Brand and Model	PCB Number
B0B9GX8S5G	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Powrun P-ONE + Sandy 2000 Tire Inflator Bundle	CC-209
B0B3MHTKMC	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Powrun P-ONE + P416 Jumper Cables Bundle	CC-209
B0B6FW8DQC	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Powrun P-ONE + S2 Safety Reflectors Bundle	CC-209
B0B45N3RN8	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Powrun P-ONE + P025 Jumper Cables Bundle	CC-209
B0B5RG12LT	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Powrun P-ONE + S1 Safety Reflectors Bundle	CC-209
B0B5RJ8RYZ	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Powrun P-ONE + Bundle	CC-209

ASIN	Seller	Brand and Model	PCB Number
B0B2CMND35	Shenzhenshi Shoudiankejiyouxiangongsi d/b/a Solvtin	Solvtin S6 PRO MAX	JS-271A
B0B2BWQW8T	Shenzhenshi Shoudiankejiyouxiangongsi d/b/a Solvtin	Solvtin S6 PRO MAX	JS-271A
B09N1FXGX8	Shenzhenshi Shoudiankejiyouxiangongsi d/b/a Solvtin	Solvtin S6 PRO	CC-209A
B09N1FY63W	Shenzhenshi Shoudiankejiyouxiangongsi d/b/a Solvtin	Solvtin S6 PRO	CC-209A
B095BZQLG5	Shenzhenshi Shoudiankejiyouxiangongsi d/b/a Solvtin	Solvtin S6	CC-209A
B095BKDSR6	Shenzhenshi Shoudiankejiyouxiangongsi d/b/a Solvtin	Solvtin S6	CC-209A

18. When Amazon delists an ASIN, a consumer can no longer purchase the product corresponding to that ASIN via the Amazon.com website.

19. Based on Pilot's actions to date, Caraku believes Pilot will continue attempting to delist every Caraku-manufactured product listed for sale on the Amazon website by alleging infringement of the '971 patent, including the following ASINs:

ASIN	Seller	Brand and Model	PCB Number
B0BGN15YQ2	Shenzhen Dianjia Technology Co., Ltd. d/b/a Yesper Direct	YJS20	CC-209A
B0BGMXV56F	Shenzhen Dianjia Technology Co., Ltd. d/b/a Yesper Direct	YJS40	CC-209A
B0BF58BYV6, B0BF57GY5C	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GP4000	CC-209A
B0BF94WPW3	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT4000S	JS-271B / JS-271A
B07XPNGD4H	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GP200	45b
B0BF9KB32J	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GE1200	CC-209A
B08R85FSW8	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT1500	CC-209A
B0B5GYR752	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT4000/100W wall charger Bundle	JS-271
B0B5GVKZPV	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT3000/100W wall charger Bundle	JS-271A

ASIN	Seller	Brand and Model	PCB Number
B0B3DQBV6P	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT4000/EVA case Bundle	JS-271
B09XQNSMKV	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT3000/EVA case Bundle	JS-271A
B0974GRF46	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GP4000/GT1500 Bundle	CC- 209A
B08H7P9P8D, B08H4SM5JV	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GP80	CC- 209A
B0B2NSDPVL, B0BMFLWTM7, B0B3SXW3WC	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GTX280	JS-271A
B0BFB18TMS, B0BF9YMTS7, B0BFB3919B	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT1500	CC- 209A
B0BFB8B3GV	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GE1200	CC- 209A
B0BF9BMKNK	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT3000	JS-271A
B0BF9M23X6, B09PH762F3	Gooloo E-Commerce Co., Ltd. d/b/a Gooloo	Gooloo GT4000	JS-271
B0836GL9VY	AUTOGEN Technology Co., Ltd. d/b/a Autogen US Direct	Autogen PJS500	CZ-78F

ASIN	Seller	Brand and Model	PCB Number
B09YRNXZNB	Shenzhen futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN V22	CC-209
B09WN2XZ6J	Shenzhen futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN V4000	JS- 237D-H
B0BJDQYPZ4	Shenzhen futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN V10	CC-209
B0BG3YL7HJ	Shenzhen futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN V6	CC-209
B0BBG7Y96C, B0BBG7RZTN	Shenzhen futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN X7	CC-209
B0BMT7VYJZ	Shenzhen futemankejiyouxiangongsi d/b/a/ VTOMAN	VTOMAN V6	CC- 209A
B0B9S94CSD	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvtin	Solvtin TRAVELER 240	JS-318
B0BLZ79123	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvtin	Solvtin S6 PRO MAX bundle jump cable1	CC- 209A

ASIN	Seller	Brand and Model	PCB Number
B0BLZ84M2M	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 PRO MAX bundle jump cable2	CC- 209A
B0B9RHMGТQ	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 Pro bundle S6PROMAX 1	CC- 209A / JS-271A
B0B9R7T3PL	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 Pro bundle S6 PROMAX 2	CC- 209A / JS-271A
B0B9QMXZBK	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 Pro bundle S6PROMAX 3	CC- 209A / JS-271A
B0B9R484MJ	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 Probundle S6PROMAX 4	CC- 209A / JS-271A
B0B9QSRFV3	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 bundle S6 PROMAX 1	CC- 209A / JS-271A
B0B9R6Q5WW	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 bundle S6 PROMAX 2	CC- 209A / JS-271A
B0B9R6MGLS	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 bundle S6PROMAX 3	CC- 209A / JS-271A

ASIN	Seller	Brand and Model	PCB Number
B0B9RCM1KD	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 bundle S6PROMAX 4	CC- 209A / JS-271A
B0B8ZVQ7P7	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 PRO MAX bundle Wall Charger1	CC- 209A
B0B8Z7RNDH	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 PRO MAX bundle Wall Charger2	CC- 209A
B0B885GK94	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 bundle Wall Charger1	CC- 209A
B0B885G5FW	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 bundle Wall Charger2	CC- 209A
B09RQK8SLX	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 bundle S6 PRO 1	CC- 209A
B09RPZTBKH	Shenzhen Shoudiankejiyouxiangongsi d/b/a Solvтин	Solvтин S6 bundle S6 PRO 2	CC- 209A
B0B8ZBYJK2	Guangzhou jielin maoyi youxiangongsi d/b/a Jacklynnte	Andeman Epower-199	JS-298
B0BDDP8R54	Guangzhou jielin maoyi youxiangongsi d/b/a Jacklynnte	Andeman Epower-155	CC- 209A

ASIN	Seller	Brand and Model	PCB Number
B0BD7435DW	Guangzhou jielin maoyi youxiangongsi d/b/a Jacklynnte	Andeman Epower-155	CC- 209A
B0B93LZF8F	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Spanarci ZETA2000	JS-323
B0BL75G6ZX	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Spanarci ZETA2000 + air compressor bundle	JS-323
B0BL71BGW1	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Spanarci ZETA2000 bundle	JS-323
B0BL6PG3H4	Shenzhenshi Xinmeitemuxiangbao Zhuangyouxiangongsi d/b/a Thikpo	Spanarci ZETA2000 bundle	JS-323
B07M68YN6W	Shenzhenshi Jiahongjingkejiyouxiangongsi d/b/a AsperX	AsperX AX118	CZ-118
B0B6WQBWQ5	Shenzhenshi Jiahongjingkejiyouxiangongsi d/b/a AsperX	AsperX AX2500	CC- 209A

ASIN	Seller	Brand and Model	PCB Number
B0B69KHRLC	Shenzhen Jiahongjingkejiyouxiangongsi d/b/a AsperX	AsperX AX2500	CC-209A
B0B6WRLYX5	Shenzhen Jiahongjingkejiyouxiangongsi d/b/a AsperX	AsperX AX2500	CC-209A
B07V9QJ44T	Shenzhen Jiahongjingkejiyouxiangongsi d/b/a AsperX	AsperX AX2500	CC-209A
B0BL1L8XVW	Shenzhen Jiahongjingkejiyouxiangongsi d/b/a AsperX	AsperX AX4500	CC-209A
B0BL1KJVCC	Shenzhen Jiahongjingkejiyouxiangongsi d/b/a AsperX	AsperX AX4500	CC-209A
B0BMQLP287	Shenzhen Jiahongjingkejiyouxiangongsi d/b/a AsperX	AsperX AX4500	CC-209A
B0BMQQB29Y	Shenzhen Jiahongjingkejiyouxiangongsi d/b/a AsperX	AsperX AX4500	CC-209A
B07VHH6YHV	Huizhoushi Niupin Dianzi Shangwu Youxian Gongsi d/b/a Grepro Trade	Grepro GP-181	CC-209A

ASIN	Seller	Brand and Model	PCB Number
B07C1QKKLH	Huizhoushi Niupin Dianzi Shangwu Youxian Gongsi d/b/a Grepro Trade	Grepro JS-GP- 500A	CC- 211H
B07C22RPYC	Huizhoushi Niupin Dianzi Shangwu Youxian Gongsi d/b/a Grepro Trade	Grepro GP-JS- 500B	CC- 211H

20. As shown in the e-mail below, Amazon has told the undersigned counsel that if a declaratory judgment action was filed seeking a judgment of non-infringement of the asserted Pilot patent (the '971 patent), the delisted ASINs would be restored, and will pause any Amazon evaluation proceedings regarding this patent until the Court renders a judgment on noninfringement. The only exception is for a subset of ASINs that have been reviewed by Amazon through their APEX proceeding process and resolved in Pilot's favor.

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RE:[CASE 11284849951] Delisting of Gooloo/Powrun/Fanttik ASINs (Complaint IDs 1123624...



patent-evaluation@amazon.com
To ● Patariu, Kevin (SDO)
Cc ● Esterhay, John (SDO); ● Patariu, Kevin (SDO)

Reply Reply All Forward ...

Thu 11/17/2022 11:22 AM

Archive 11/16/2025

This sender patent-evaluation@amazon.com is from outside your organization.

Hello,

Thank you for writing. With regards to your clients' recently removed ASINs, these ASINs will remain removed from our website at this time. However, if you provide us with notice that you have filed a declaratory judgement action seeking a judgment of non-infringement of the asserted Pilot patent, we will pause both any future evaluation proceedings regarding this patent and any post-evaluation removal requests submitted by Pilot based on this patent, pending the court's decision in the declaratory judgment action. Additionally, we will reinstate all ASINs that were removed through post-evaluation removal requests, pending the court's decision. However, ASINs that were directly reviewed in an evaluation that ended in Pilot's favor will remain removed pending the court's decision.

In addition to the above, please also note that communications within the Amazon Patent Evaluation Express program between Amazon and third-parties may be considered confidential. We would, of course, provide such documents in response to a valid subpoena.

Best regards,

Neutral Patent Evaluation Team
Amazon.com

21. For the subset of ASINs have been reviewed by Amazon through their APEX proceeding process and resolved in Pilot's favor, Amazon will relist these products if a court enters a declaratory judgment of noninfringement. These products are identified in the table below:

ASIN	Seller	Brand and Model	PCB Number
B09V1743PT	Shenzhen Konghui Trading Co., Ltd., d/b/a Hulkman Direct	Hulkman Alpha65	JS-311
B08M41FX48, B095KG64PR,	Shenzhen Konghui Trading Co., Ltd.,	Hulkman Alpha85	JS-260

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ASIN	Seller	Brand and Model	PCB Number
B095KG7Y9L, B095KH9S3S, B09696NZK5, B09FXR12MM, B09FXRZ91X, B09LR5TGXS, B09SSV1RTK, B09WDZYN2S	d/b/a Hulkman Direct		
B08PB48DG8, B0978M6FXN, B09WF1FWCC, B09WF1H3J3	Shenzhen Konghui Trading Co., Ltd., d/b/a Hulkman Direct	Hulkman Alpha85S	JS-260B
B08TQFHW1C, B09WF1NY7L, B09WF1XKD3, B09WF1Y7BB, B09CYCGSKB	Shenzhen Konghui Trading Co., Ltd., d/b/a Hulkman Direct	Hulkman Alpha100	JS-261

**FIRST CLAIM FOR RELIEF
(Declaratory Judgment of Non-Infringement of Claims 1-30 of the '971 Patent)**

22. Carku restates and incorporates by reference the allegations in the paragraphs above as if set forth fully herein.

23. On information and belief, Pilot claims to own all rights, title, and interest in the '971 patent.

24. While the face of the '971 patent states that the assignee of the '971 patent is "Pilot Inc." and not "Pilot, Inc." Pilot has asserted to Amazon that it is the rights owner of the '971 patent.

1 25. The '971 Patent has three independent claims: Claims 1, 17, and 18.

2 26. Claim 1 of the '971 Patent recites:

3 1. A jumpstarter comprising:
4 a battery connected to a voltage regulator, the battery capable of
5 supplying power, via the voltage regulator, to at least one
6 microcontroller, the battery also capable of supplying power to an
7 automobile battery when the battery has at least one predetermined
8 voltage;
9 a load detector circuit to detect when the jumpstarter is correctly
10 connected to the automobile battery;
11 said at least one microcontroller generating, when the battery has said
12 at least one predetermined voltage, an output signal; and
13 switching circuitry, including at least one switch, to operatively
14 connect the battery to the automobile battery when said at least one
15 microcontroller generates the output signal to supply a charging
16 current to the automobile battery.

17 27. Claim 17 of the '971 Patent recites:

18 17. A jumpstarter comprising:
19 a first battery connected to a voltage regulator, the first battery capable
20 of supplying power, via the voltage regulator, to at least one
21 microcontroller, the first battery also capable of supplying power to an
22 automobile battery when the first battery has at least one
23 predetermined voltage;
24 a battery level detector to detect a level of the first battery;
25 a load detector to detect a type of connection of a load;
26 a microcontroller of said at least one microcontroller to generate an
27 output signal only when the first battery has said at least one
28 predetermined voltage; and

1 switching circuitry, including at least one switch, to operatively
2 connect the first battery to the automobile battery when the
3 microcontroller generates the output signal to supply a charging
4 current to the automobile battery.

5 28. Claim 18 of the '971 Patent recites:

6 18. A jumpstarter comprising:
7 an output port having a positive polarity output and a negative polarity
8 output;
9 an internal power supply connected to a voltage regulator, the internal
10 power supply capable of supplying power, via the voltage regulator, to
11 at least one microcontroller, the internal power supply also capable of
12 supplying power to said output port when the internal power supply
13 has at least one predetermined voltage;
14 a load detection sensor connected in circuit with said positive polarity
15 output and said negative polarity output, configured to detect presence
16 of a vehicle battery connected between said positive polarity output
17 and said negative polarity output;
18 a reverse polarity sensor connected in circuit with said positive
19 polarity output and said negative polarity output, configured to detect
20 polarity of d [sic] vehicle battery connected between said positive
21 polarity output and said negative polarity output and to provide an
22 output signal indicating whether a positive terminal and a negative
23 terminal of said vehicle battery are properly connected with said
24 positive polarity output and said negative polarity output of said output
25 port;
26 a power switch connected between said internal power supply and said
27 output port; and
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1 a microcontroller of said at least one microcontroller configured to
2 provide an output signal to said power switch, such that said power
3 switch is turned on to cause said internal power supply to be connected
4 to said output port in response to signals from said load detection
5 sensor and said reverse polarity sensor indicating the presence of a
6 vehicle battery at said output port and proper polarity connections of
7 the positive terminal and the negative terminal of said vehicle battery
8 with said positive polarity output and said negative polarity output, and
9 is not turned on when signals from said load detections sensor and said
10 reverse polarity sensor indicate either the absence of a vehicle battery
11 at said output port or improper polarity connections of the positive
12 terminal and the negative terminal of said vehicle battery with said
13 positive polarity output and said negative polarity output.

14
15 29. As explained in the tables above, Pilot has alleged and continues to
16 allege that Carku-manufactured products infringe the '971 patent, through Amazon
17 proceedings, and elsewhere.

18 30. On information and belief, Pilot has alleged or will allege that all
19 Carku-manufactured products sold on Amazon.com and other channels infringe the
20 '971 patent, including the ASINs identified above, and including all products that
21 use PCBs with part numbers CC-209, CC-209A, CC-211, CC-211H, CZ-118, CZ-
22 78F, JS-237, JS-237D-H, JS-271, JS-271A, JS-271B, JS-278, JS-298, JS-310, JS-
23 316A, JS-317, JS-317A, JS-318, JS-321, JS-323, JS-260, JS-260B, JS-261, and JS-
24 311.

25 31. Independent Claims 1, 17 and 18 require that the device connect the
26 battery pack power to the automobile battery when the microcontroller generates an
27 output signal. In other words, Independent Claims 1, 17 and 18, read in the context
28 of the specification, requires that if the output signal is generated, then the switch

1 turns on. The aforementioned Carku-manufactured products, do not meet this
2 limitation, because even if the microcontroller generates an output signal
3 commanding the switch to be turned on, the switch does not turn on unless other
4 conditions are satisfied in the circuitry.

5 32. Independent Claims 1, 17, and 18 contain a similar limitation,
6 requiring a load detector / load detection sensor that detects whether a device is
7 correctly connected or properly connected (Claims 1 and 18) or a type of
8 connection to a load (Claim 17). The aforementioned Carku-manufactured
9 products do not have the claimed load detector / load detection because the circuitry
10 alleged to be a load detector does not identify a correct connection of the load.

11 33. Independent Claim 18 requires a “microcontroller configured to
12 provide an output signal to said power switch.... in response to signals from said
13 load detection sensor and said reverse polarity sensor... .” The aforementioned
14 Carku-manufactured products do not meet this limitation because the output of the
15 alleged load detector does not connect to the microcontroller circuit to provide a
16 signal.

17 34. Independent Claim 1 contains a limitation related to battery voltage
18 requirements not met in aforementioned Carku-manufactured products. Claim 1
19 requires “the microcontroller generating, when the battery has said at least one
20 predetermined voltage, an output signal” but in the aforementioned Carku-
21 manufactured, other conditions must be satisfied (not just predetermined battery
22 voltage) to generate an output signal.

23 35. Independent Claims 1, 17, and 18 contain a similar limitation,
24 requiring a battery, first battery, or internal power supply connected to a voltage
25 regulator. In several of the aforementioned Carku-manufactured products,
26 including but not limited models using the JS-260, JS-260B, JS-261, and JS-311
27 PCB, this limitation is not met because switching circuitry is interposed between
28 the battery voltage regulator.

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PRAYER FOR RELIEF

36. Wherefore, Plaintiff Shenzhen Carku Technology Co., Ltd. requests that this Court enter judgment as follows:

A. Declaring that Carku-manufactured jump starters, including the jump starters identified by ASIN and PCB above, do not directly or indirectly infringe any valid and enforceable claim of the '971 Patent, either literally or under the doctrine of equivalents;

B. For a finding that this case is exceptional;

C. For costs and reasonable attorneys' fees incurred in connection with this action; and

D. Such other and further relief as this Court or a jury may deem just and proper.

Dated: November 18, 2022

PERKINS COIE LLP

By: /s/ Kevin J. Patariu
Kevin J. Patariu, Bar No. 256755
John D. Esterhay, Bar No. 282330

*Attorneys for Plaintiff
Shenzhen Carku Technology Co., Ltd.*