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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

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11 INNOMED TECHNOLOGIES, INC.  
12 Plaintiff,  
13 v.  
14 UCLA HEALTH and AKIRA ISHIYAMA  
15 Defendants.  
16  
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CASE NO. 2:23-cv-5268  
  
COMPLAINT FOR PATENT  
INFRINGEMENT  
  
JURY TRIAL DEMANDED

18 Plaintiff InnoMed Technologies complains of Defendants UCLA Health and Akira Ishiyama (“UCLA,”  
19 “Ishiyama” or “Defendants”) as follows:

20 **I. NATURE OF LAWSUIT**

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

23 **II. THE PARTIES**

24 2. Plaintiff InnoMed Technologies (“INNOMED”) is a corporation having a principal place  
25 of business located in Encino, California. INNOMED is the owner, by assignment, of U.S. Patent No.  
26 11,083,789 (the '789 Patent) issued August 10, 2021, and entitled “IVIG Treatments for Bell’s Palsy”  
27 (copy attached as Exhibit A). INNOMED owns all rights, title, and interest in, and has standing to sue  
28 for infringement of the '789 Patent.



1           10.     The inventors of the ‘789 Patent, Dr. John Joseph and Karen Doyle were the first to  
2 identify and put into practice the use of IVIG to treat patients suffering from Bell’s Palsy. Dr. John Joseph  
3 and Karen Doyle have assigned their rights in the ‘789 Patent to INNOMED.

4           11.     Prior to their invention as claimed in the ‘789 Patent, many treatments for Bell’s Palsy  
5 failed to reverse the debilitating conditions associated with the disease. To the extent that any of the  
6 treatments used actually worked, the recovery time would be many months. What Ms. Doyle and Dr.  
7 Joseph found was that by administering IVIG to a patient suffering from Bell’s Palsy, the patients  
8 uniformly recovered from the debilitating conditions associated with this disease in as little as two weeks.

9           12.     Dr. John Joseph informed Defendant Ishiyama and Defendant UCLA about his invention  
10 and asked Defendant Ishiyama to treat a patient suffering from Bell’s Palsy to see how the invention  
11 worked. To Dr. John Joseph’s and Defendant Ishiyama’s surprise, the invention comprising treating a  
12 patient suffering from Bell’s Palsy with IVIG worked better to resolve Bell’s Palsy than currently used  
13 treatments. In fact, the patient’s Bell’s Palsy resolved within about two weeks.

14           13.     Defendants Ishiyama and UCLA recognizing the incredible value of Dr. John Joseph’s  
15 and Karen Doyle’s invention to treat Bell’s Palsy then used the treatment on at least nine other patients  
16 that are known to Dr John Joseph and Karen Doyle. Based on information provided to Dr. John Joseph,  
17 the recovery rate of these at least these other nine additional patients was one hundred percent (100%).  
18 Additionally, the recovery times for these additional nine patients were all relatively short as compared  
19 to current treatments, with several recovering in about two weeks.

20           14.     Knowing that the inventive treatment of Dr. John Joseph and Karen Doyle worked better  
21 than other commonly used treatments, Defendants Ishiyama and UCLA decided to proceed with using  
22 the inventive treatment method using IVIG to treat patients suffering with Bell’s Palsy without obtaining  
23 the consent of either inventors, Dr. John Joseph or Karen Doyle. Instead, Defendants Ishiyama and  
24 UCLA with full knowledge of the patents existence, have willfully infringed the ‘789 Patent to the great  
25 detriment and loss of Dr. John Joseph and Karen Doyle.

26           15.     Defendants Ishiyama and UCLA have been on notice of the ‘789 Patent and INNOMED's  
27 claims of infringement by Defendants, and, for at least this reason, Defendants Ishiyama and UCLA  
28 actions are believed to be willful and undertaken with the intent to infringe the ‘789 Patent.



**VII. JURY DEMAND**

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

Dated: June 30, 2023

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