

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

M.E.A.C. ENGINEERING LTD,  
2 ABA HILEL ST., APT. 5808  
RAMAT GAN 5250601, ISRAEL

Plaintiff,

v.

3M COMPANY  
3M Center,  
St. Paul, Minnesota 55144

Defendant

Civil Action No. 1:23-cv-1256

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff MEAC Engineering LTD, by its undersigned counsel, alleges as follows for its Complaint against defendant 3M Company.

**THE NATURE OF THIS ACTION**

1. MEAC brings this action against 3M pursuant to 35 U.S.C. §101 et. seq. and §§271, 281, 283, 284, & 285 inclusive, for infringement of one or more claims of U.S. Patents No. 8,506,554 ("the '554 Patent) titled "Wound Closure and Drainage System" and U.S. Patent No. 8,858,534 (the '534 Patent) titled "Wound Closure and Drainage System." The '554 and '534 patents protect the inventions of Plaintiff in the area of Negative Pressure Wound Therapy (NPWT). Defendant has been made aware of the Patents-in-Suit but have continued to infringe and have refused to cease its infringing actions, thereby necessitating this lawsuit.

### **THE PARTIES**

2. Plaintiff MEAC is an Israel corporation located at: 2 Aba Hilel St., Apt. 5808, Ramat Gan 5250601, Israel. MEAC is the owner of the patents-in-suit by assignment.

3. Defendant 3M is a Delaware Corporation with a headquarters at 3M Center, St. Paul, Minnesota 55144. 3M manufactures, uses, offers to sell and sells the accused products throughout the United States, including facilities in Alabama, Alaska, Arkansas, California, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Massachusetts, Michigan, Minnesota, Missouri, Nebraska, New Jersey, New York, North Carolina, Ohio, South Carolina, South Dakota, Texas - Angleton, Brownwood, and Wisconsin.

4. Defendant 3M maintains a Negative Pressure Wound Therapy/3M™ V.A.C.® Therapy Customer Support Facility in San Antonio Texas, located at 12930 W Interstate 10, San Antonio, TX 78249-2248.

5. Defendant, and customers of Defendant, use the accused products to practice the claimed methods of the '554 patent in suit.

### **JURISDICTION AND VENUE**

6. This is an action for patent infringement arising under the laws of the United States, 35 U.S.C. §271 *et seq.*

7. This Court has subject matter jurisdiction over this action pursuant to 35 U.S.C. §§271, 281 and 28 U.S.C. §§1331 and 1338(a), federal question, and 28 U.S.C. §1332 diversity jurisdiction.

8. This Court has personal jurisdiction over Defendant 3M because Defendant is located within this judicial district and has a regular and established place of business in this

judicial district. Defendant is also registered to do business in Texas and may be served via its registered agent, Corporation Service Company D/B/A Csc-Lawyers Incoat 211 E. 7TH Street Suite 620 Austin, Tx 78701.

9. Venue is proper in the Western District of Texas pursuant to 28 U.S.C. §§1391(b), 1391(c) and 1400(b). Upon information and belief, Defendant 3M has a facility directly related to servicing the accused products and directly related to assisting customers in the activities accused of infringing the method claims of the asserted patents. Defendant is doing business in this judicial district, has committed acts of infringement and has regular and established places of business in this District and has employees conducting regular and established business in this judicial district.

10. This Court has personal jurisdiction over Defendant and venue is proper pursuant to TEX. CIV. PRAC. & REM. CODE § 17.041 *et seq.* Personal jurisdiction exists over Defendant because Defendant has minimum contacts with this forum as a result of business regularly conducted within the State of Texas and within this district, and, on information and belief, specifically as a result of, at least, committing the tort of patent infringement within Texas and this District. This Court has personal jurisdiction over Defendant, in part, because Defendant does continuous and systematic business in this District, including by providing infringing products and services to the residents of the Western District of Texas that Defendant knew would be used within this District, and by soliciting business from the residents of the Western District of Texas. Defendant is subject to general personal jurisdiction in this Court and venue is proper, because, *inter alia*, Defendant has regular and established places of business throughout this District, including at least at 12930 Interstate 10, San Antonio, TX 78249 designated as "

Negative Pressure Wound Therapy/3M™ V.A.C.® Therapy Customer Support" and thus directly related to the accused products and processes. 3M, directly, through employees and through agents regularly does, solicits, and transacts business in the Western District of Texas. Defendant employs full time personnel within this District in positions that, on information and belief, relate to infringement of the patents-in-suit. Accordingly, this Court's jurisdiction over the Defendant comports with the constitutional standards of fair play and substantial justice and arises directly from the Defendant's purposeful minimum contacts with the State of Texas. In addition Defendant has also made its products available within this judicial district and advertised to residents within the District to hire employees to be located in this District.

#### **BACKGROUND AND GENERAL ALLEGATIONS**

11. In 2005, Mr. Carmeli Adahan filed a patent application for his invention which advanced the treatment of would care. His inventive Negative Pressure Wound Treatment system was granted several US and international patents, including the patents-in-suit, 8,506,554 and 8,858,534. The patents claim devices which provide wound closure and drainage. The '554 patent also claims a method for treating wounds with negative pressure.

12. Defendant manufactures and sells products know generally as Negative Pressure Wound Therapy equipment, and as 3M™ SensaT.R.A.C.™ Technology, including the following:

3M™ V.A.C.® Ulta 4 Therapy System,  
3M™ V.A.C.® RX4 Therapy System,  
3M™ ActiV.A.C.™ Therapy System,  
3M™ V.A.C.® Simplicity Therapy System,  
V.A.C. FREEDOM™ Therapy System,  
3M™ Prevena™ Plus 125 Therapy Unit  
SensaT.R.A.C. Pad is included with all 3M™ V.A.C.® and 3M™ AbThera™ Dressings  
SensaT.R.A.C. Pad is also sold as an accessory.

The accused 3M products infringe claims of the '554 and '534 patents.

13. On August 13, 2013, United States Patent No. 8,506,554 (“the ‘554 Patent”), entitled “Wound closure and drainage system” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The ‘554 Patent claims patent-eligible subject matter and is valid and enforceable. MEAC is the exclusive owner by assignment of all rights, title, and interest in the ‘554 Patent, including the right to bring this suit for injunction and damages, and including the right to sue and recover all past, present, and future damages for infringement of the ‘554 Patent. Defendant is not licensed to the ‘554 Patent, either expressly or implicitly, nor do they enjoy or benefit from any rights in or to the ‘554 patent whatsoever. A true and correct copy of the ‘554 Patent is attached hereto as **Exhibit A**.

14. On October 14, 2014, United States Patent No. 8,858,534 (“the ‘534 Patent”), entitled “Wound closure and drainage system” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The ‘534 Patent claims patent-eligible subject matter and is valid and enforceable. MEAC is the exclusive owner by assignment of all rights, title, and interest in the ‘534 Patent, including the right to bring this suit for injunction and damages, and including the right to sue and recover all past, present, and future damages for infringement of the ‘534 Patent. Defendant is not licensed to the ‘534 Patent, either expressly or implicitly, nor do they enjoy or benefit from any rights in or to the ‘534 patent whatsoever. A true and correct copy of the ‘534 Patent is attached hereto as **Exhibit B**.

15. The ‘554 and ‘534 Patents are referred to herein as the “patents-in-suit.” Plaintiff MEAC is the owner of the entire right, title, and interest in and to the patents-in-suit. The patents-in-suit are presumed valid under 35 U.S.C. § 282.

## THE PATENTS

16. The claims of the '534 patent are directed to "a vacuum system for applying negative pressure to a wound" and to "a method for applying negative pressure to a wound."

The '534 patent contains eighteen claims directed to the system and four claims directed to the method, Claim one of the '534 patent recites:

1. A vacuum system for applying negative pressure to a wound, the vacuum system comprising: an enclosure, a venting arrangement, a tube, a vacuum source, and a controller:

the enclosure being attachable to a periphery of the wound so as to define a confined volume;

the enclosure having an enclosure outlet connectable to said vacuum source via said tube so that negative pressure can be selectively created in said volume;

the venting arrangement comprising a flow restrictor to restrict flow through said venting arrangement and to thereby provide a controlled flow of ambient air into said vacuum system upstream of the vacuum source;

the controller configured for controlling operation of the vacuum source while providing venting of the vacuum system via said venting arrangement to provide a desired level of said negative pressure in said confined volume.

17. The '088 patent is directed to "an enclosure for applying negative pressure to a wound," "a disposable assembly for applying negative pressure to a wound" and "a vacuum system for applying a negative pressure to a wound." The '554 patent contains seven claims directed to the enclosure, four claims protecting the disposable assembly and eighteen claims reciting the vacuum system of the invention. Claim one of the '554 patent recites:

1. An enclosure for applying negative pressure to a wound, the enclosure being attachable to the wound circumference so as to define a confined volume, and comprising a tube and a venting arrangement,

the enclosure having an enclosure outlet connectable to a vacuum source via said tube so that negative pressure can be selectively created in said volume,

said venting arrangement located outside said enclosure and comprising a flow restrictor to restrict flow through said venting arrangement located outside said enclosure and comprising a flow restrictor such that ambient air can enter said tube via said venting arrangement and flow to said vacuum source without having to enter said enclosure.

## INFRINGEMENT

18. Defendant manufactures and sells Negative Pressure Wound Therapy equipment, and 3M™ SensaT.R.A.C.™ Technology, including the following:

3M™ V.A.C.® Ultra 4 Therapy System,  
3M™ V.A.C.® RX4 Therapy System,  
3M™ ActiV.A.C.™ Therapy System,  
3M™ V.A.C.® Simplicity Therapy System,  
V.A.C. FREEDOM™ Therapy System,  
3M™ Prevena™ Plus 125 Therapy Unit  
SensaT.R.A.C. Pad is included with all 3M™ V.A.C.® and 3M™ AbThera™ Dressings  
SensaT.R.A.C. Pad is also sold as an accessory.

The 3M NPWT Systems and components infringe claims of both the '554 and the '534 patents.

19. Defendant has, under 35 U.S.C. §271(a), directly infringed, and continue to directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the '554 and the '534 Patents, by making, using, testing, selling, offering for sale and/or importing into the United States Defendant's Accused Products.

20. Defendant also indirectly infringes the '554 and '534 patents by actively inducing the direct infringement by third parties under 35 U.S.C. §271(b). Defendant has knowingly and intentionally actively aided, abetted and induced others to directly infringe at least one claim of the '554 and '534 patents, including its customers throughout the United States. Defendant continues to induce infringement of the '554 and '534 patents. Defendant has contributorily infringed and continue to be contributory infringers under 35 U.S.C. §271(c) because, with knowledge of the '554 and '534 patents, they supply a material part of an infringing method and/or system, where the material part is not a staple article of commerce, and is incapable of substantial noninfringing use. Defendant contributes to its customers' infringement because, with knowledge of the '554 and '534 patents, Defendant supplies the technology that allows its

customers to infringe the patents, including the method claims.

21. Plaintiff has conducted a detailed analysis, establishing and confirming that Defendant's Accused Products directly infringe and when used according to Defendant's instructions for operation, indirectly infringe claims of the '554 and '534 Patents.

22. Attached as an Exhibit to the Complaint is claim chart demonstrating the correspondence of the operation of the accused products with elements of exemplary claims of the '554 and '534 patents.

23. Defendant and its customers have continued infringement.

24. The accused products satisfy the elements of the asserted claims:

'534 Claim 1 - **A vacuum system for applying negative pressure to a wound,**



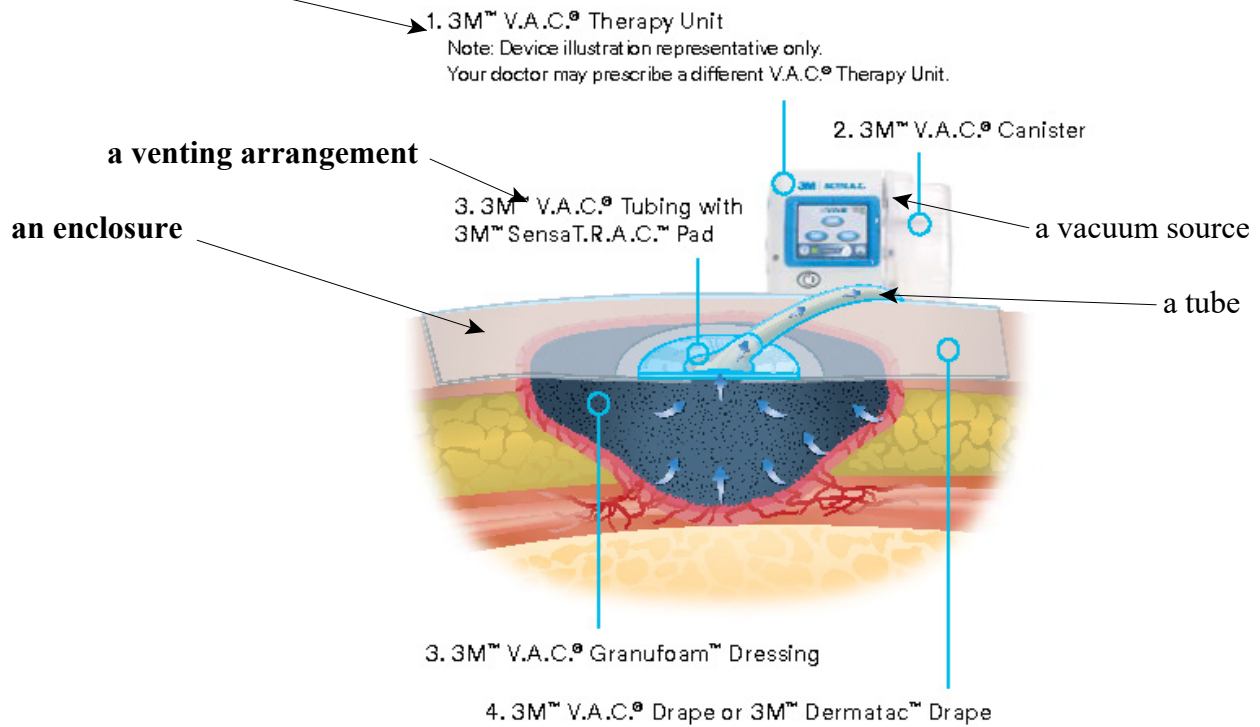
## Negative pressure wound therapy you can trust

Discover the value of 3M™ V.A.C. Therapy, now with 3M™ Dermatac™ Drape





**the vacuum system comprising: an enclosure, a venting arrangement, a tube, a vacuum source, and a controller:**



**the enclosure having an enclosure outlet connectable to said vacuum source via said tube so that negative pressure can be selectively created in said volume;**

**the enclosure being attachable to a periphery of the wound so as to define a confined volume;**

**The 3M™ V.A.C.® Therapy System is an advanced wound therapy system consisting of five parts:**

1. The 3M™ V.A.C.® Therapy Unit that delivers negative pressure
2. A disposable canister that collects wound fluids and infectious materials
3. Sterile plastic tubing with 3M™ SensaT.R.A.C.™ Technology that allows the therapy unit to sense the amount of negative pressure delivered to the wound
4. Special foam dressings (3M™ V.A.C.® Granufoam™ Dressing and 3M™ V.A.C. Whitefoam™ Dressings) that are placed in the wound
5. A clear adhesive drape (3M™ V.A.C.® Drape or 3M™ Dermatac™ Drape) that covers the foam dressing(s)

**the venting arrangement comprising a flow restrictor to restrict flow through said venting arrangement and to thereby provide a controlled flow of ambient air into said vacuum system upstream of the vacuum source;**

The screenshot shows a web browser window with the URL [https://www.3m.com/3M/en\\_US/p/d/b5005265161/](https://www.3m.com/3M/en_US/p/d/b5005265161/). The page title is "SensaT.R.A.C.™ PadClear" and it has navigation tabs for "Details", "Specifications", and "Frequently Bought Together".

The main content area contains the following text and list items:

3M™ V.A.C.® Therapy is the only negative pressure wound therapy (NPWT) device with proprietary SensaT.R.A.C.™ Technology, which continuously monitors negative pressure at the wound site and compensates for any changes, maintaining a consistent environment for fluid removal.

SensaT.R.A.C.™ Technology provides confidence that the appropriate environment for wound healing is being maintained.

- Engineered to maintain selected negative pressure
- Maintains and monitors pressure through 4 outer lumens
- Remove exudates through 1 inner lumen
- Provides real-time pressure feedback
- Adjusts and monitors pressure at the wound site
- Alerts clinicians through an alarm when a blockage is detected
- Triggers positive blast of air through outer - lumens approximately every 5 minutes to help reduce blockages
- Helps maintain consistent environment for fluid removal

**SensaT.R.A.C.™ with Easy Clear™ Purge Technology**

- Forces positive air periodically through outer lumen to aid in the prevention and clearance of blockages
- Helps to clear fluid from outer lumens to maintain their pressure sensing ability
- Helps to clear fluid in inner lumen that is not being pulled up (typically because of a blockage)

Healthcare providers should review the product User Manual, Safety Information and/or Instructions for Use prior to application.

Annotations on the screenshot include the text "Controlled Air Flow" with two arrows pointing to the bullet points: "Triggers positive blast of air through outer - lumens approximately every 5 minutes to help reduce blockages" and "Forces positive air periodically through outer lumen to aid in the prevention and clearance of blockages".

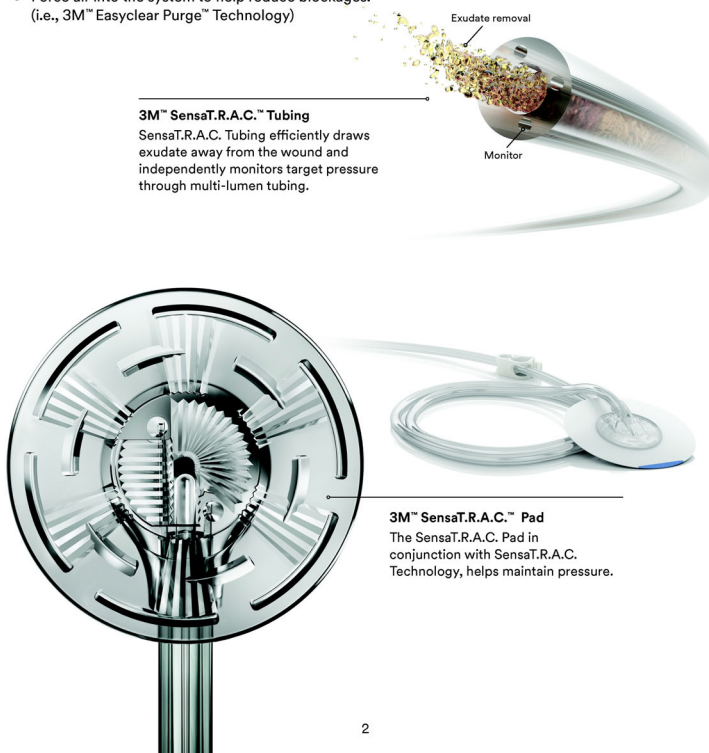
the controller configured for controlling operation of the vacuum source while providing venting of the vacuum system via said venting arrangement to provide a desired level of said negative pressure in said confined volume.

### 3M™ V.A.C.® Therapy: Technology you can trust

V.A.C.® Therapy is the only negative pressure wound therapy device engineered with 3M™ SensaT.R.A.C.™ Technology, a proprietary technology that maintains and adjusts to deliver set pressure at the wound site. SensaT.R.A.C. Technology helps ensure that the prescribed settings are delivered to the wound.

#### V.A.C.® Therapy with SensaT.R.A.C. Technology can:

- Sense pressure changes at the wound site.
- Regulate and maintain pressure as conditions change. (e.g., change in head height, patient position, viscosity of exudate, etc.)
- Detect blockages below the canister site and notify clinicians with alarms when target pressure is not achieved.
- Force air into the system to help reduce blockages. (i.e., 3M™ Easyclear Purge™ Technology)



25. Plaintiff is the owner of the '554 and '534 Patents-in-Suit.

26. Defendant has infringed, and continues to infringe, at least claims 1 - 29 of the '554 Patent and claims 1 - 22 of the '534 Patent, under 35 U.S.C. § 271(a)(b) and/or (c), by (a) making, using, offering to sell, selling and/or importing into the United States, vacuum systems, enclosures, disposable assemblies that infringe the asserted claims and by performing the

claimed methods in the United States, (b) by inducing others to use the accused products and/or sell the accused products and to perform the claimed methods in the United States, (c) by contributing to the infringement of others and by selling components of the patented systems and (b & c) by selling a product for performing the patented process. Defendant continues to manufacture, use, offer to sell, sell and import accused products. The accused products are also being used to infringe. Defendant continues to sell accused products inducing and contributing to infringement by others and also continue to perform infringing activity by performing the claimed method in the United States.

27. The 3M NPWT Systems are infringing systems and thus directly infringe '554 Claims 12-23 and 25-29 and '534 Claims 1-18. The systems include a enclosure and thus directly infringes '544 Claims 1- 7 and 25. The systems also include a disposable assembly and thus directly infringes '554 Claims 8 - 11. The systems are used to perform the method of Claims 19 - 22 of the '534 patent and thus directly and indirectly by inducement, infringe Claims 19-22 of the '534 patent.

28. The 3M NPWT Systems, are infringing systems and thus directly infringe '554 Claims 12-23 and 25-29 and '534 Claims 1-18. The systems include a enclosure and thus directly infringe '544 Claims 1- 7 and 25. The systems also includes a disposable assembly and thus directly infringe '554 Claims 8 - 11. The systems are used to perform the method of Claims 19 - 22 of the '534 patent and thus directly and indirectly by inducement, infringe Claims 19-22 of the '534 patent.

29. The 3M dressings & kits, are infringing enclosures and thus directly infringe '554 Claims 1- 7 and 25. The dressings and kits also contribute to the infringement, as a material part

of an infringing system, which is not a staple article of commerce and are incapable of substantial noninfringing use, and thus contributorily infringe '554 Claims 12-23 and 25-29 and '534 Claims 1-18. The dressings and kits are also part of the disposable assembly and thus contributorily infringe '554 Claims 8-11.

30. The 3M SensaT.R.A.C. Pad are infringing enclosures and thus directly infringe '554 Claims 1- 7 and 25. The SensaT.R.A.C. Pad also contributes to the infringement, as a material part of an infringing system, which is not a staple article of commerce and is incapable of substantial noninfringing use, and thus contributorily infringe '554 Claims 12-23 and 25-29 and '534 Claims 1-18. The SensaT.R.A.C. Pad is also part of the disposable assembly and thus contributorily infringe '554 Claims 8-11.

31. The '534 patents is also infringed under 35 USC 271(a) when an accused product is "used" by Defendant to perform the applying negative pressure method of claims 19 - 22 of the '534 patent; the '534 patent is infringed under 271(b) when Defendant "induces" others to practice the claimed method; the '534 patent is infringed under 271(c) when Defendant provides components for use by others in practicing the patented method.

32. Upon information and belief, Defendant has directly infringed one or more of claims of the '554 and '534 patents under 35 USC §271(a):

"(a) Except as otherwise provided in this title, whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.

by engaging in accused activity including making, using, offering to sell, selling and importing accused products and/or by practicing the claimed method in the United States. Defendant continues to infringe claims of the '554 and '534 Patents.

33. Upon information and belief, Defendant has indirectly infringed one or more of the claims of the '554 and '534 patents under 35 USC §271(b):

(b) Whoever actively induces infringement of a patent shall be liable as an infringer.

by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

34. Upon information and belief, Defendant has indirectly infringed one or more of the claims of the '554 and '534 patents under 35 USC §271(c):

(c) Whoever offers to sell or sells within the United States or imports into the United States . . . or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, shall be liable as a contributory infringer.

by providing accused products, and other components and supplies, which are combined to form an infringing product and/or used in practicing methods which infringe the claims of the '554 and '534 patents, thus contributing to the infringement of the '554 and '534 patents.

35. Defendant does not have a license or authority to use the '554 or the '534 Patent.

36. Defendant has been willfully infringing the '554 and '534 Patents since at least as early as they became aware of the patents-in-suit. Upon information and belief, Defendant has no good faith defense to Plaintiff's infringement allegations and have refused to cease selling products or to engage in further attempts to reach a business resolution. Instead, Defendant has intentionally continued their knowing infringement.

37. As a result of Defendant's infringement of the '554 and '534 Patents, Plaintiff has suffered and will continue to suffer damages in an amount not yet determined, of at least a

reasonable royalty.

**COUNT I**  
**INFRINGEMENT OF U.S. PATENT NO. 8,506,554**

38. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

39. Defendant 3M has infringed, and continues to directly infringe, at least claims 1 - 29 of the '554 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Accused Products in the United States.

41. Upon information and belief, Defendant 3M has indirectly infringed one or more of the claims of the '554 patent under 35 USC §271(c) by providing accused products, and components and supplies, which are used as components of infringing systems which infringe the claims of the '554 patent, thus contributing to the infringement of the '554 patent.

39. 3M does not have a license or authority to use the '554 Patent.

40. As a result of 3Medela's infringement of the '554 Patent, Plaintiff has suffered and will continue to suffer damages in an amount not yet determined, of at least a reasonable royalty.

**COUNT II**  
**INFRINGEMENT OF U.S. PATENT NO. 8,858,534**

41. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

39. Defendant 3M has infringed, and continues to directly infringe, at least claims 1 - 29 of the '534 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Accused Products in the United States and by practicing the claimed method.

40. Upon information and belief, Defendant 3M has indirectly infringed one or more

of the claims of the '534 patents under 35 USC §271(b) by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

41. Upon information and belief, Defendant 3M has indirectly infringed one or more of the claims of the '534 patent under 35 USC §271(c) by providing accused products, and components and supplies, which are used as components of infringing systems and in practicing a patented process and which are used to practice methods which infringe the claims of the '534 patent, thus contributing to the infringement of the '534 patent.

39. 3M does not have a license or authority to use the '534 Patent.

40. As a result of 3M's infringement of the '534 Patent, Plaintiff has suffered and will continue to suffer damages in an amount not yet determined, of at least a reasonable royalty.

#### **PRAYER FOR RELIEF**

A. For a Judgment declaring that 3M has infringed the '554 Patent.

B. For a judgment declaring that 3M's infringement of the '554 Patent has been willful;

C. For a Judgment declaring that 3M has infringed the '534 Patent.

D. For a judgment declaring that 3M's infringement of the '534 Patent has been willful;

E. For a grant of a permanent injunction pursuant to 35 U.S.C. §283, enjoining the Defendant from further acts of infringement;

F. For a judgment awarding Plaintiff compensatory damages as a result of Defendant's infringement sufficient to reasonably and entirely compensate Plaintiff for



infringement of the '554 and '534 Patents in an amount to be determined at trial;

G. For a judgement and order awarding a compulsory ongoing royalty;

H. For a judgment declaring that Defendant's infringement was willful and for enhancement of damages in accordance with 35 U.S.C. 284;

I. For a judgment declaring that this case is exceptional and awarding Plaintiff its expenses, costs and attorneys' fees in accordance with 35 U.S.C. § 285 and Rule 54(d) of the Federal Rules of Civil Procedure;

J. For a judgment awarding Plaintiff prejudgment interest pursuant to 35 U.S.C. §284, and a further award of post judgment interest, pursuant to 28 U.S.C. §1961, continuing until such judgment is paid.

K. For a judgment awarding Plaintiff enhanced damages under 35 U.S.C. §284; and

L. For such other relief to which Plaintiff is entitled under the applicable United States laws and regulations or as this Court deems just and proper.

### **DEMAND FOR JURY TRIAL**

Pursuant to the Federal Rules of Civil Procedure Rule 38(b), Plaintiff hereby demands trial by jury as to all claims in this litigation.

DATED: October 5, 2023

Respectfully submitted,

/s/ Joseph J. Zito  
Joseph J. Zito  
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