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

13 SEASONS 4 INC.,

14 Plaintiff,

15 vs.

16 SPECIAL HAPPY, LTD.,
17 A Corporation of China,
18 Defendant.

Case No. 2:23-cv-09649

**PLAINTIFF’S COMPLAINT FOR
PATENT INFRINGEMENT OF U.S.
PATENT NO. 11,015,798 AND U.S.
PATENT NO. 11,454,385**

19 **COMPLAINT FOR PATENT INFRINGEMENT**

20 1. Plaintiff, Seasons 4 Inc. (“Plaintiff” or “S4”) files this Complaint for patent
21 infringement, asserting U.S. Patent No. 11,015,798, which issued on May 25, 2021, and U.S. Patent
22 No. 11,454,385, which issued on September 27, 2022, and demand for jury trial against Defendant
23 Special Happy Co, Ltd. (“Defendant” or “Special Happy”), and alleges as follows:

24 **NATURE OF THE ACTION**

25 2. This is a civil action for patent infringement arising under the patent laws of the
26 United States, 35 U.S.C. § 1, *et seq.*, including 35 U.S.C. § 271, which gives rise to the remedies
27 specified under 35 U.S.C. § 281 and §§ 283-285.
28

1 **THE PARTIES**

2 3. Plaintiff Seasons 4 Inc., dba S4 Lights, is a corporation organized under the laws
3 of Delaware with its principal place of business at 3601 La Grange Parkway, Suite 500, Toano,
4 Virginia.

5 4. Plaintiff's products and services are distributed throughout the United States.

6 5. Upon information and belief, Defendant Special Happy is a corporation organized
7 under the laws of China, with its principal place of business at Unit 9, 16/F, High Block, Cheung
8 Fung Industrial Building, 23-39 Pat Tin Par Street, Tsuen Wan, New Territories, Hong Kong,
9 China.

10 **THE PATENTS-IN-SUIT**

11 6. Founded in 2009 and based in Toano, Virginia, S4 is a commercial-grade lighting
12 fixture wholesaler that designs, manufactures, and distributes innovative decorative lighting
13 solutions. S4 has established itself as an industry leader through research and development efforts
14 directed to producing high quality interior and exterior lighting solutions for large scale effects
15 installed by professionals. S4 holds dozens of patents protecting these innovation efforts. For
16 example, S4's patent protection for its next generation water-resistant outdoor decorative light
17 strings, the NxG series, includes U.S. Patent No. 11,015,798 (the "'798 Patent") and U.S. Patent
18 No. 11,454,385 (the "'385 Patent") (together, the "Patents-in-Suit").

19 7. The '798 Patent, titled "Water-Resistant Wired Electro-Magnetic Component
20 Capture," was duly and legally issued by the United States Patent and Trademark Office ("USPTO")
21 on May 25, 2021. S4 is the owner of the '798 Patent, with all substantial rights, including the
22 exclusive right to enforce, sue, and recover damages for past and future infringements. A copy of
23 the '798 Patent is attached as Exhibit 1.

24 8. The '385 Patent, titled "Water-Resistant Wired Electro-Magnetic Component
25 Capture," was duly and legally issued by the USPTO on September 27, 2022. S4 is the owner of the
26 '385 Patent, with all substantial rights, including the exclusive right to enforce, sue, and recover
27 damages for past and future infringements. A copy of the '385 Patent is attached as Exhibit 2.
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1 **JURISDICTION AND VENUE**

2 9. This Court’s jurisdiction over this action is proper under relevant statutes, including
3 35 U.S.C. § 271, *et seq.*, 28 U.S.C. § 1331 (federal question jurisdiction), and 28 U.S.C. § 1338
4 (jurisdiction over patent actions). The Court has subject matter jurisdiction over this action pursuant
5 to 28 U.S.C. §§ 1331 and 1338(a).

6 10. This Court has general personal jurisdiction over Defendant at least because
7 Defendant sells infringing products in this district and purposely directs its activities to the state of
8 California and, upon information and belief, Defendant has committed acts of direct and indirect
9 patent infringement in California and Defendant regularly conducts business, solicits business,
10 and/or derives substantial revenue from products provided within California including products that
11 infringe S4’s patented technology.

12 11. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(c)(3) because
13 Defendant is not resident in the United States and may be sued in any judicial district.

14 **COUNT ONE**

15 **DIRECT INFRINGEMENT OF U.S. PATENT NO. 11,015,798**

16 12. Plaintiff incorporates by reference the allegations in paragraphs 1-11 as if fully set
17 forth herein.

18 13. On information and belief, Defendant has infringed claims of the ’798 Patent,
19 including at least claim 1, in violation of 35 U.S.C. § 271(a) by manufacturing, using, offering to
20 sell, selling, and/or importing infringing products.

21 14. Claim 1 of the ’798 Patent recites:

22 A water-resistant LED capture device comprising:

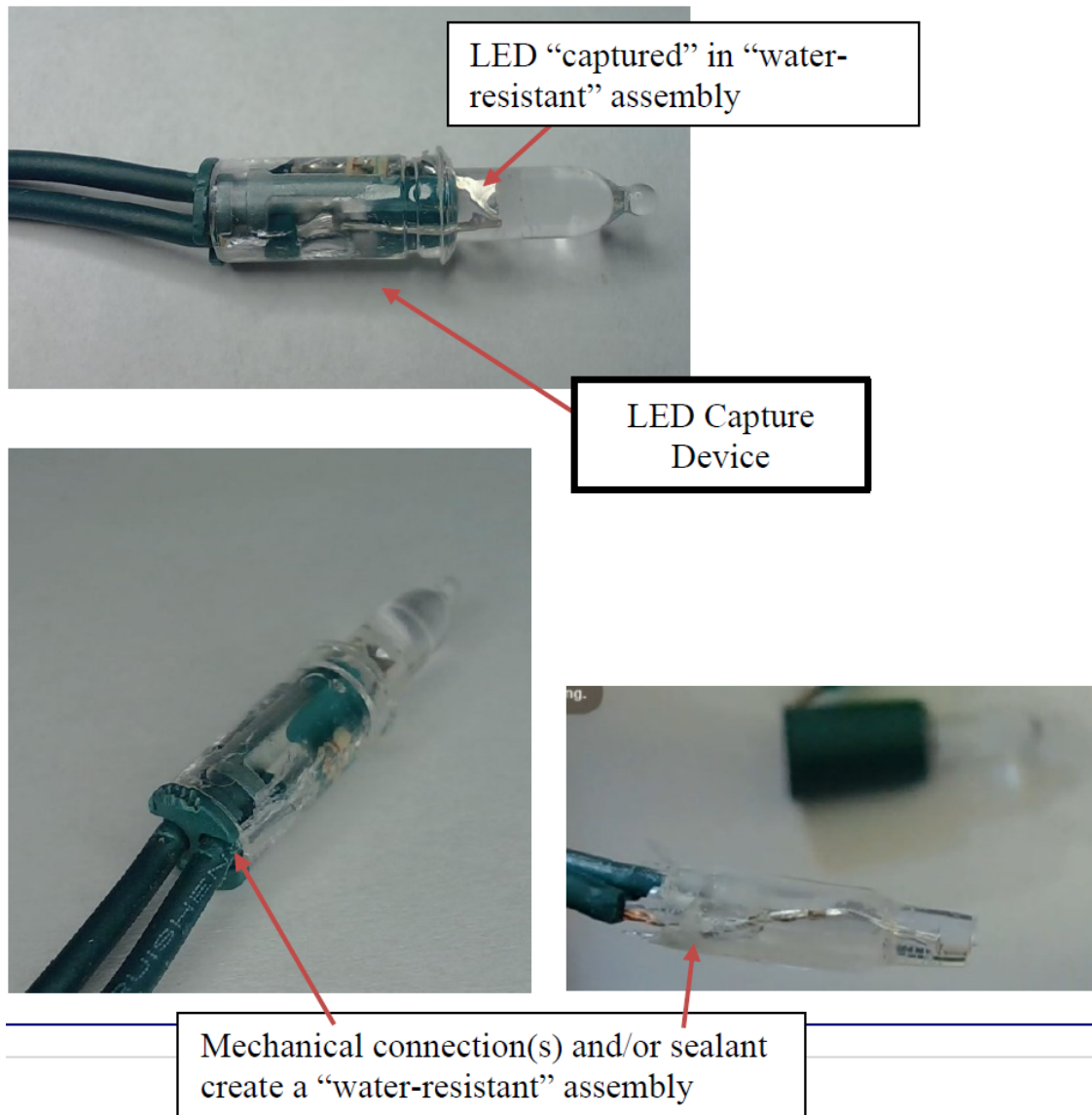
23 a base module; and,

24 a cap module configured to assemble to the base module, wherein an
25 internal cavity is formed by the cap module and the base module when
26 the cap module is assembled to the base module, the internal cavity
27 configured to receive a light-emitting device therein, the cap module
28 providing an optical path from a received light-emitting device to an

1 outside of the water-resistant LED capture device, wherein a sealing
2 agent is disposed in the internal cavity for providing water-resistant
3 sealing,
4 wherein assembling the base module to the cap module results in
5 compression that provides a water-resistant seal to the water-resistant
6 LED capture device,
7 wherein, when the cap module is assembled to the base module, the base
8 module engages a fixing structure of the cap module that captures the
9 base module in the cap module to form a first water-resistant seal
10 between the cap module and the base module,
11 wherein, when the base module is inserted into the cap module, the base
12 module defines two lumens extending longitudinally through at least a
13 portion of the base module, each of the two lumens being configured to
14 provide a pathway for an insulated conductor from the outside of the
15 water-resistant LED capture device to the internal cavity to supply
16 electrical energy to the light-emitting device therein,
17 wherein assembling the cap module to the base module introduces a
18 radial compression that reduces the mean cross-sectional area of each of
19 the two lumens to form a second water-resistant seal circumscribing each
20 of the insulated conductors in the corresponding two lumens,
21 wherein the cap module provides an optical path from the received light-
22 emitting device to an outside of the water-resistant LED capture device
23 via a translucent or transparent portion of the cap module.

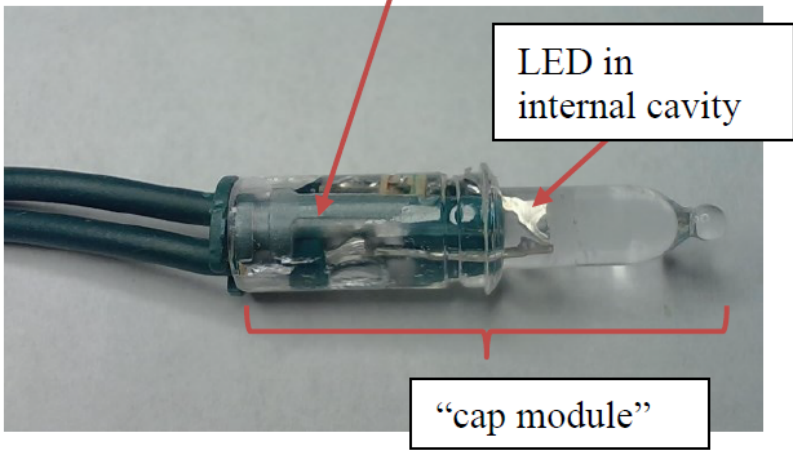
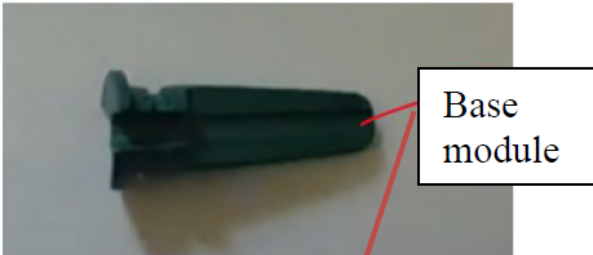
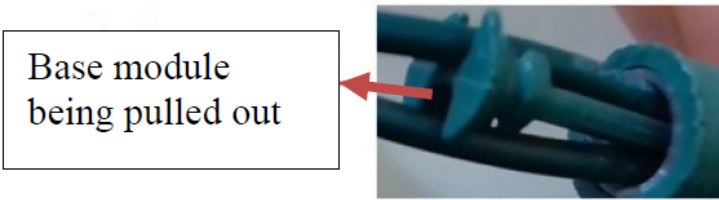
24 15. On information and belief, Defendant has directly infringed at least claim 1 of the
25 '798 Patent by making, using, offering to sell, selling, and/or importing at least a product marketed
26 as a "50L Light Set, 12" Lead Cord, 6" Light Spacing x 4" End to End" having "Large Peripheral
27 Visibility," "Filled & Sealed by Epoxy," with "3 Housing Layers to Secure the Lead" and
28 "Stretchable Room for Cords" (the "Accused Product"). Exhibit 3, Special Happy Marketing Page.

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2 16. The Accused Product is a water-resistant LED capture device as shown in the
3 annotated photos below.
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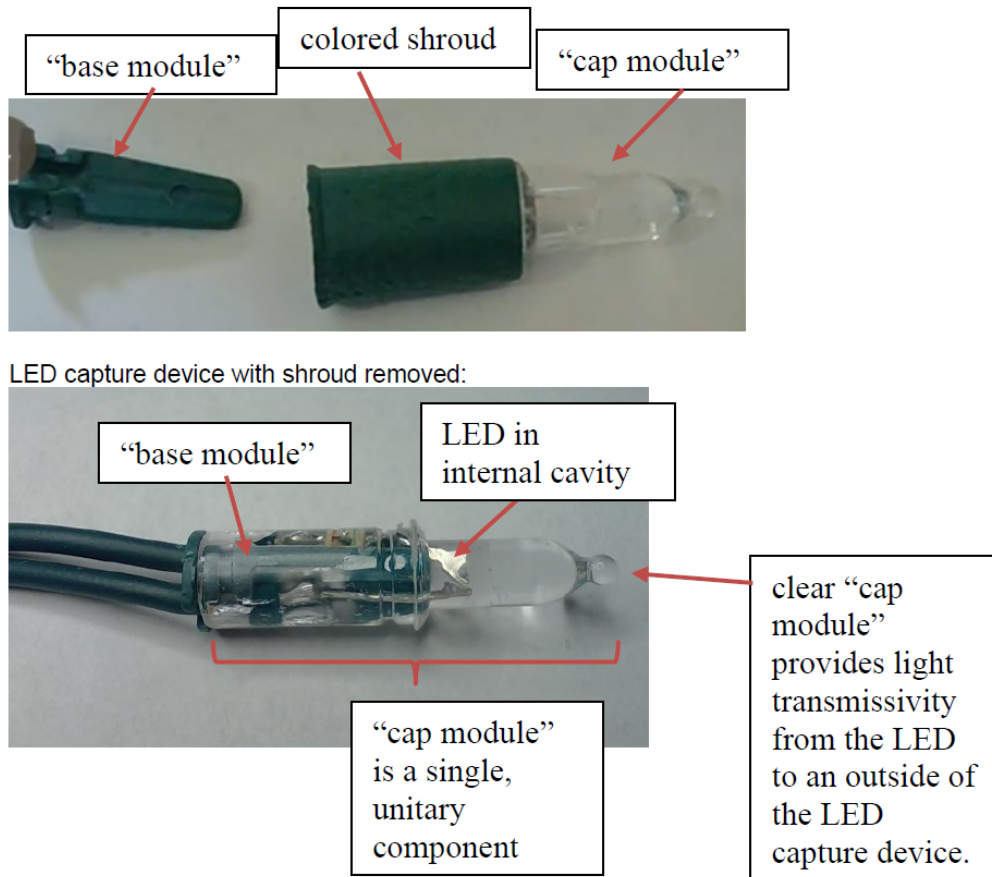


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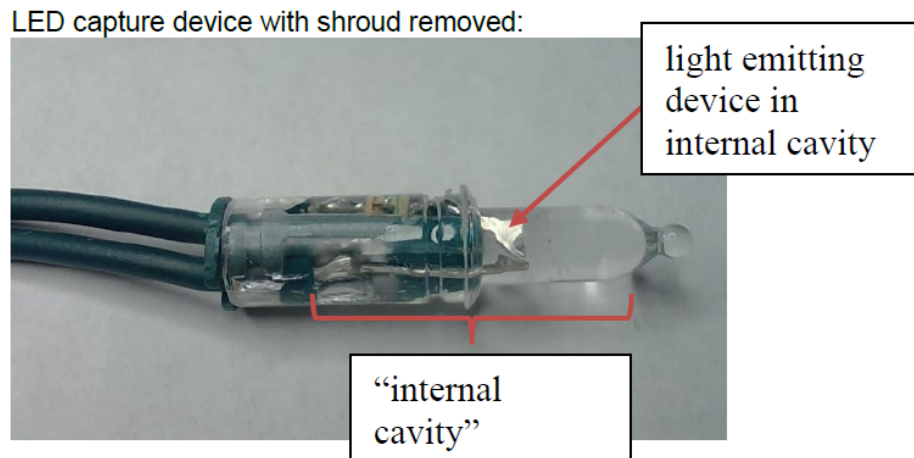
17. The Accused Product includes a base module.



1 18. The Accused Product includes a cap module configured to assemble to the base
2 module.

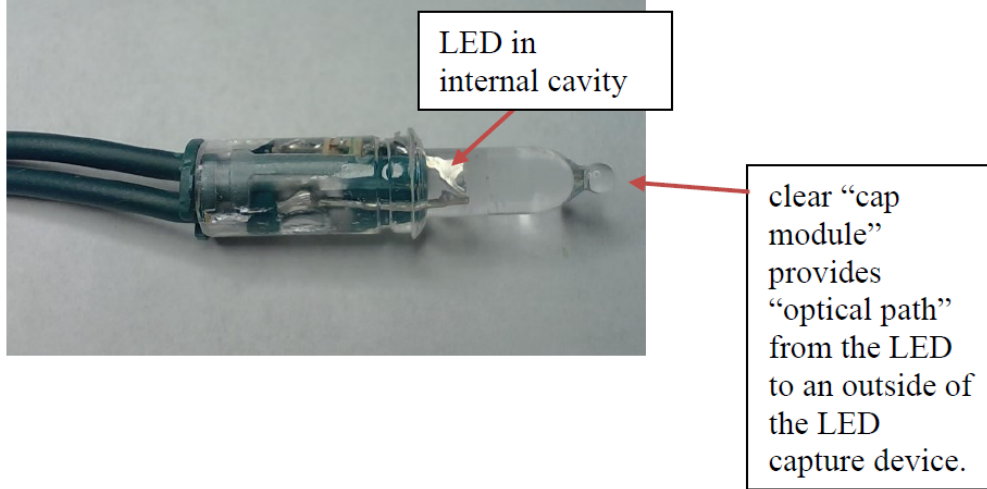


17 19. In the Accused Product, an internal cavity is formed by the cap module and the base
18 module when the cap module is assembled to the base module, the internal cavity configured to
19 receive a light-emitting device therein.

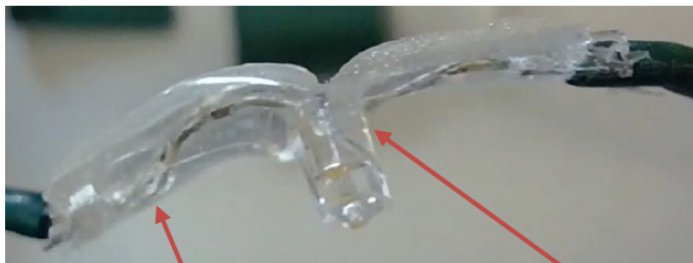
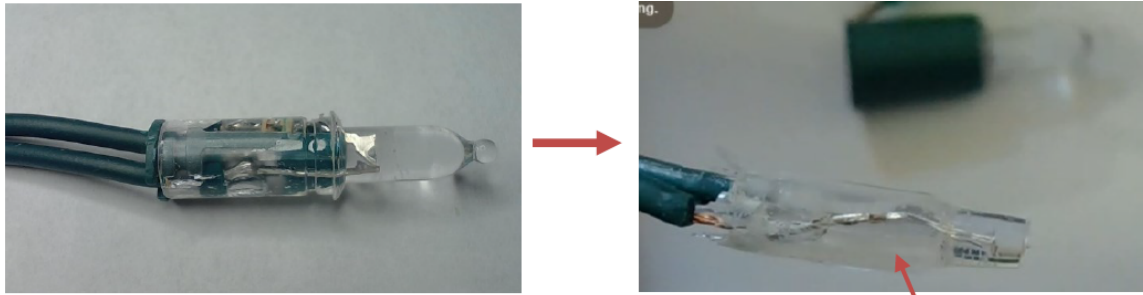


1 20. The cap module of the Accused Product provides an optical path from a received
2 light-emitting device to an outside of the water-resistant LED capture device.

3 Lighting assembly with shroud removed:



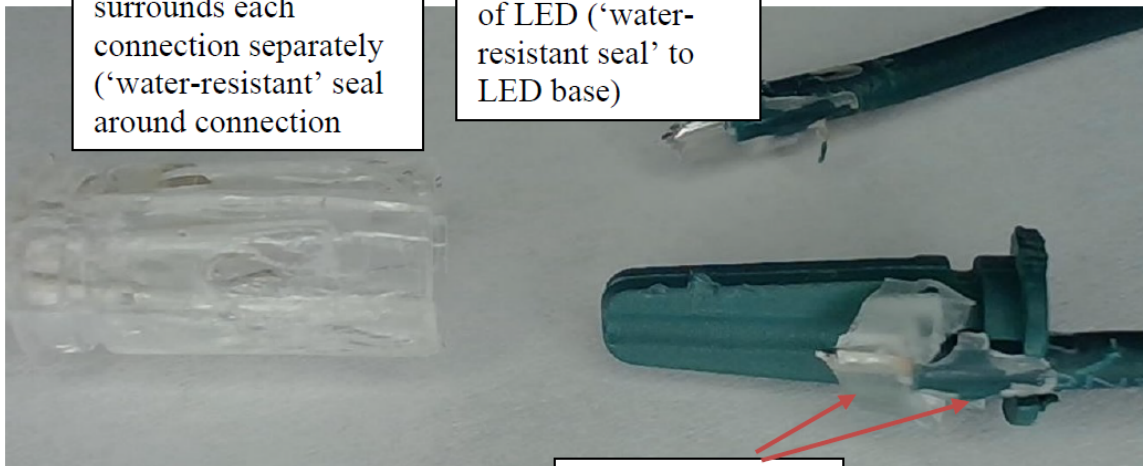
1 21. A sealing agent is disposed in the internal cavity of the Accused Product for
2 providing water-resistant sealing.



Potting compound
(retaining internal shape
of lens module where it
was pressed against the
entire internal
circumference)

Potting compound
surrounds each
connection separately
(‘water-resistant’ seal
around connection)

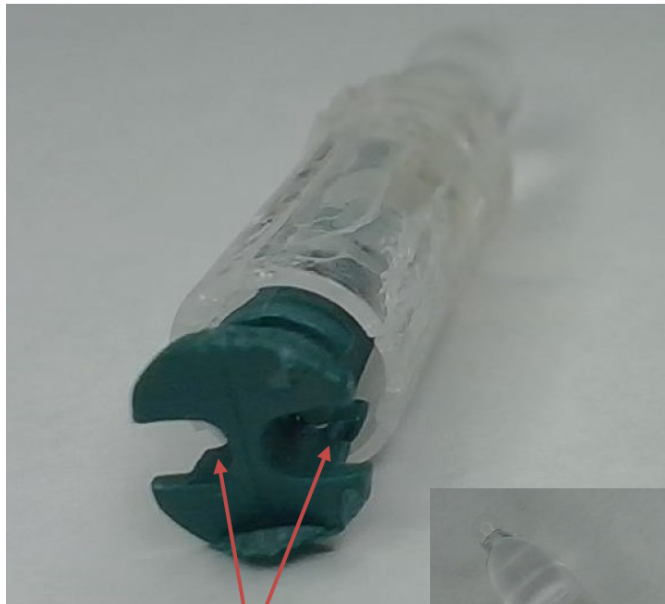
Potting compound
encapsulates base
of LED (‘water-
resistant seal’ to
LED base)



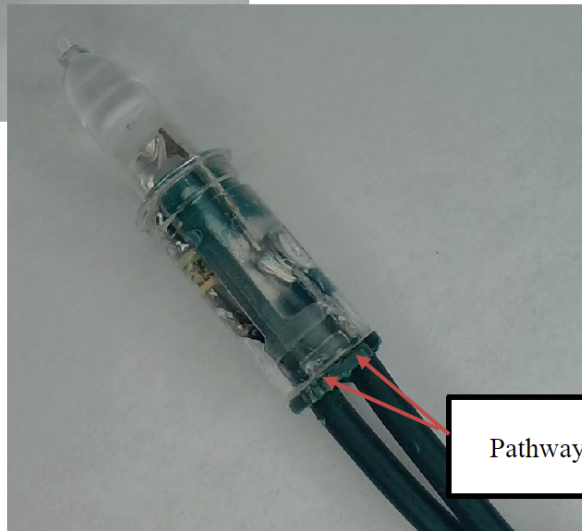
Potting compound
contacts base
module, lead, and
cap module

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1 24. When the base module of the Accused Product is inserted into the cap module, the
2 base module defines two lumens extending longitudinally through at least a portion of the base
3 module, each of the two lumens being configured to provide a pathway for an insulated conductor
4 from the outside of the water-resistant LED capture device to the internal cavity to supply electrical
5 energy to the light-emitting device therein.

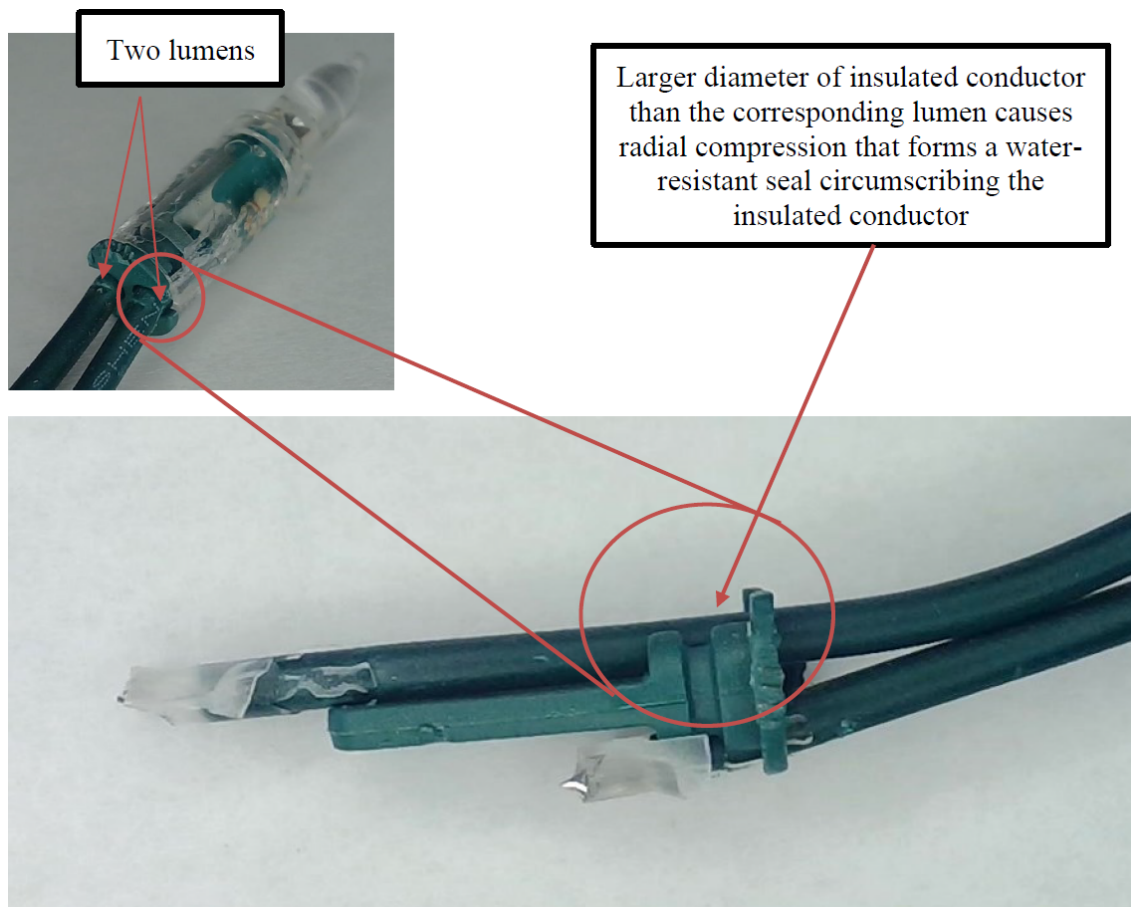


Two lumens



Pathways

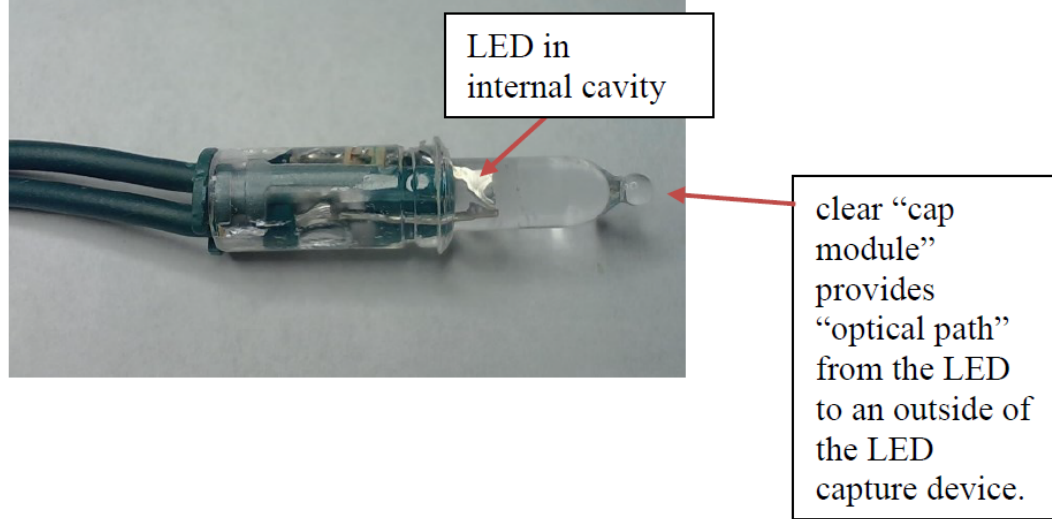
1 25. Assembling the cap module of the Accused Product to the base module introduces a
2 radial compression that reduces the mean cross-sectional area of each of the two lumens to form a
3 second water-resistant seal circumscribing each of the insulated conductors in the corresponding two
4 lumens.



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1 26. The cap module of the Accused Product provides an optical path from the received
2 light-emitting device to an outside of the water-resistant LED capture device via a translucent or
3 transparent portion of the cap module.

4 Lighting assembly with shroud removed:



13 27. The full extent of Defendant’s infringement is not presently known to S4. S4 makes
14 this preliminary identification of infringing products and infringed claims in Count One without the
15 benefit of discovery or claim construction in this action, and expressly reserves the right to augment,
16 supplement, and revise its identifications based on additional information obtained through
17 discovery or otherwise.

18 28. S4 has suffered damages, including specifically lost profits, as a result of Defendant’s
19 infringement of the ’798 Patent in an amount to be determined at trial.

20 29. Defendant’s infringement of the ’798 Patent is causing irreparable harm for which S4
21 has no adequate remedy at law unless Defendant is enjoined by this Court. Under 35 U.S.C. § 283,
22 S4 is entitled to a permanent injunction against further infringement of the ’798 Patent.

23 **COUNT TWO**

24 **INDIRECT INFRINGEMENT OF U.S. PATENT NO. 11,015,798**

25 30. Plaintiff incorporates by reference the allegations in paragraphs 1-29 as if fully set
26 forth herein.

27 31. Defendant has had knowledge of the ’798 patent since at least the time it was served
28 with the Complaint in this lawsuit.

1 32. In addition to directly infringing the '798 Patent, as discussed above with respect to
2 Count One, Defendant knew or was willfully blind to the fact that it was inducing infringement of
3 the '798 Patent under 35 U.S.C. § 271(b) by instructing, encouraging, directing, and requiring third
4 parties, including its customers, to indirectly infringe by using the Accused Product in the United
5 States.

6 33. Defendant knowingly and actively aided and abetted, encouraged, and contributed to
7 the indirect infringement of the '798 Patent by instructing and encouraging its customers,
8 purchasers, users, vendors, partners, and manufacturers to meet the elements of the '798 Patent with
9 the Accused Product, as described above. Such instructions and encouragement included, but is not
10 limited to, advising third parties to use the Accused Product in an infringing manner by advertising
11 and promoting the use of the Accused Product in an infringing manner.

12 34. The full extent of Defendant's indirect infringement is not presently known to S4. S4
13 makes this preliminary identification of infringing products and infringed claims in Count Two
14 without the benefit of discovery or claim construction in this action, and expressly reserves the right
15 to augment, supplement, and revise its identifications based on additional information obtained
16 through discovery or otherwise.

17 35. S4 has suffered damages, including specifically lost profits, as a result of Defendant's
18 indirect infringement of the '798 Patent in an amount to be determined at trial.

19 36. Defendant's indirect infringement of the '798 Patent is causing irreparable harm for
20 which S4 has no adequate remedy at law unless Defendant is enjoined by this Court. Under 35
21 U.S.C. § 283, S4 is entitled to a permanent injunction against further infringement of the '798
22 Patent.

23 **COUNT THREE**

24 **DIRECT INFRINGEMENT OF U.S. PATENT NO. 11,454,385**

25 37. The Plaintiff incorporates by reference the allegations in paragraphs 1-36 as if fully
26 set forth herein.

27 38. On information and belief, Defendant has infringed claims of the '385 Patent,
28 including at least claim 1, in violation of 35 U.S.C. § 271(a) by manufacturing, using, offering to

1 sell, selling, and/or importing infringing products.

2 39. Claim 1 of the '385 Patent recites:

3 A water-resistant LED capture device comprising:

4 a base module; and,

5 a cap module configured to assemble to the base module, wherein an
6 internal cavity is formed by the cap module and the base module when

7 the cap module is assembled to the base module, the internal cavity
8 configured to receive a light-emitting device therein, the cap module

9 providing an optical path from a received light-emitting device to an

10 outside of the water-resistant LED capture device,

11 wherein at least one of the base module and the cap module are

12 configured such that assembling the base module to the cap module

13 results in compression that provides a first water-resistant seal between

14 the cap module and the base module at a first end of the internal cavity,

15 wherein, when the base module is assembled to the cap module, the base

16 module defines at least two lumens extending longitudinally through at

17 least a portion of the base module, each of the at least two lumens being

18 configured to provide a pathway for an insulated conductor from the

19 outside of the water-resistant LED capture device to the internal cavity to

20 supply electrical energy to the light-emitting device therein, and,

21 wherein assembling the cap module to the base module introduces a

22 radial compression that forms a second water-resistant seal

23 circumscribing each of the insulated conductors in the corresponding at

24 least two lumens such that a plurality of water-resistant seals, comprising

25 the first water-resistant seal and the second water-resistant seal,

26 substantially seal the internal cavity such that electrical connections of

27 the insulated conductors to the received light-emitting device are sealed

28 within the internal cavity.

1 40. On information and belief, Defendant has directly infringed at least claim 1 of the
2 '385 Patent by making, using, offering to sell, selling, and/or importing a product marketed as a
3 "50L Light Set, 12" Lead Cord, 6" Light Spacing x 4" End to End" having "Large Peripheral
4 Visibility," "Filled & Sealed by Epoxy," with "3 Housing Layers to Secure the Lead" and
5 "Stretchable Room for Cords" (the "Accused Product"). Exhibit 3.

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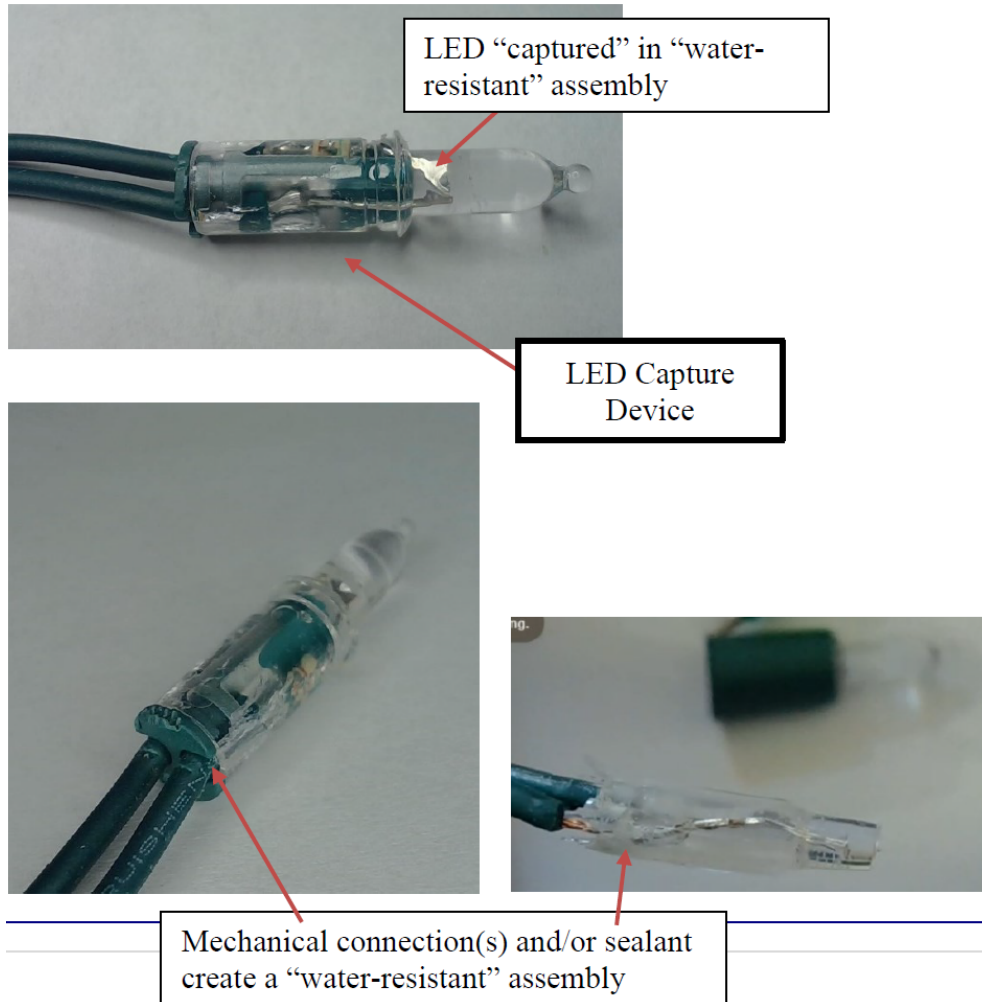
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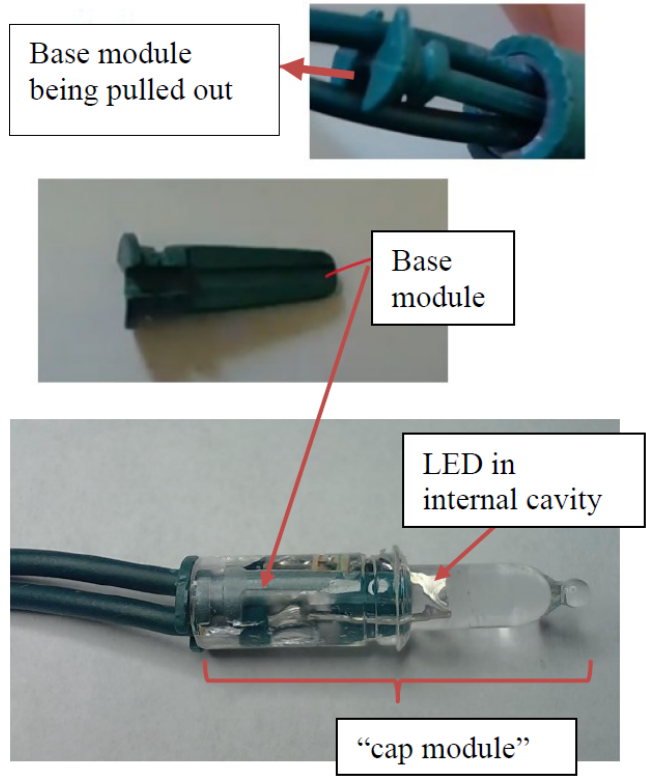
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1 41. The Accused Product is a water-resistant LED capture device. Photographs of the
2 Accused Product are shown in the below images:

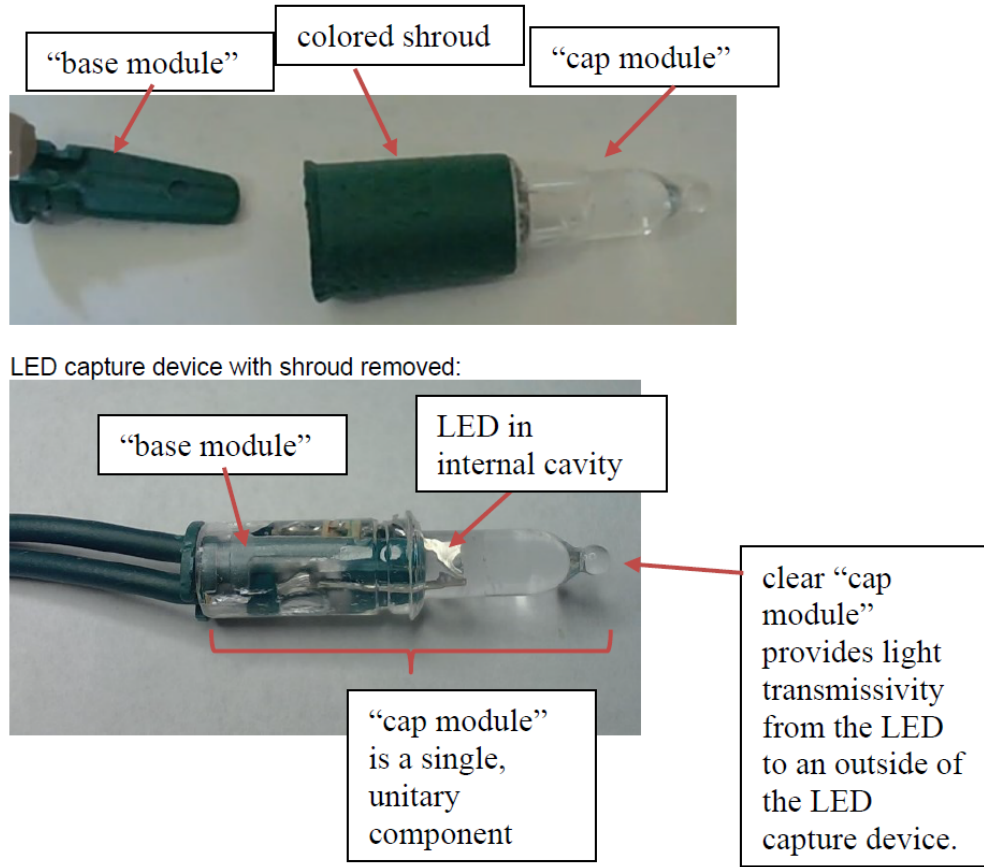


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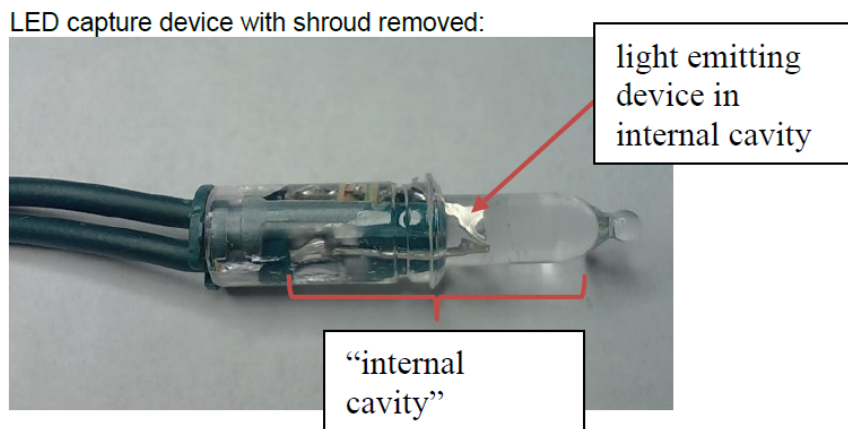
42. The Accused Product includes a base module.



1 43. The Accused Product includes a cap module configured to assemble to the base
2 module.

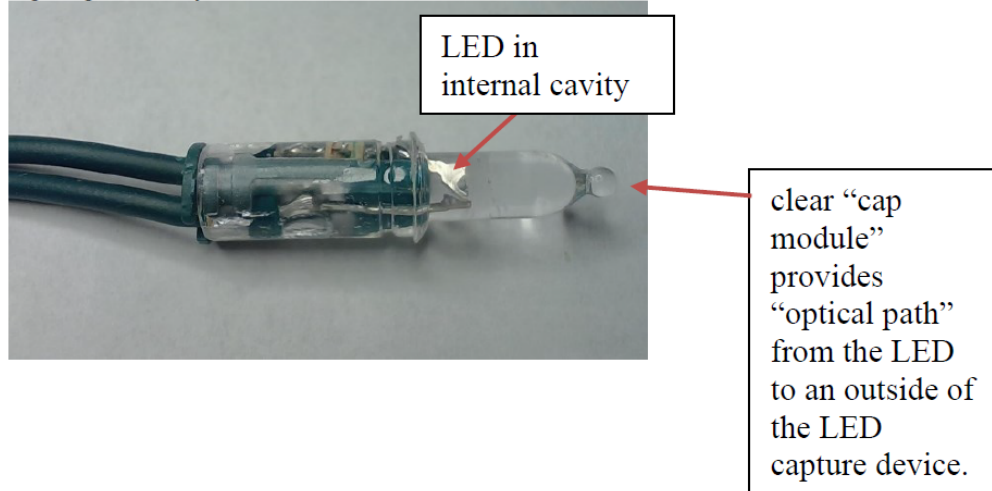


17 44. An internal cavity is formed by the cap module of the Accused Product and the base
18 module when the cap module is assembled to the base module, the internal cavity configured to
19 receive a light-emitting device therein.

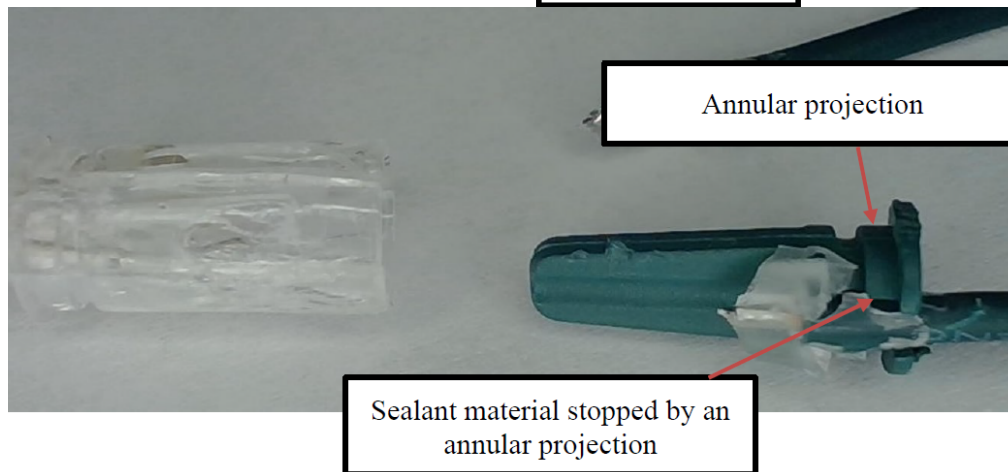
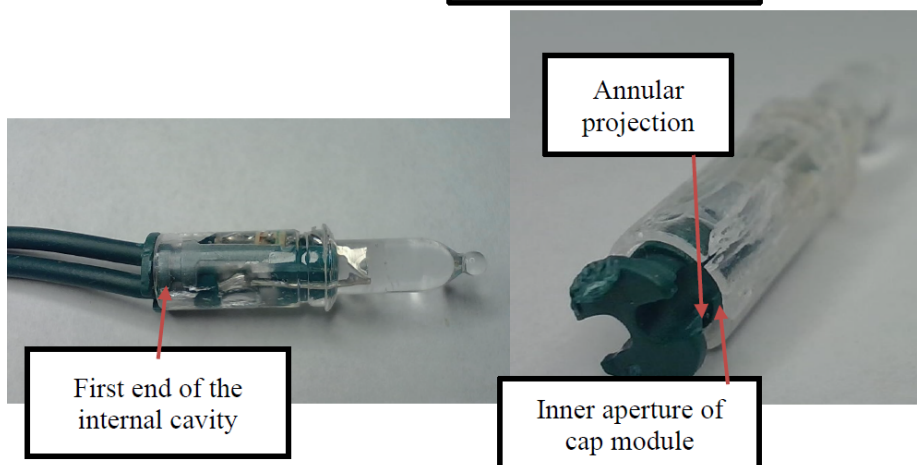
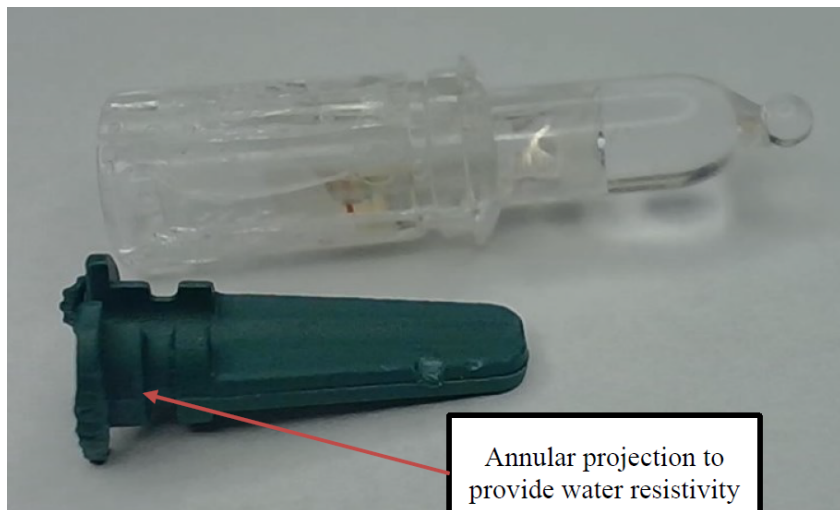


1 45. The cap module of the Accused Product provides an optical path from a received
2 light-emitting device to an outside of the water-resistant LED capture device.

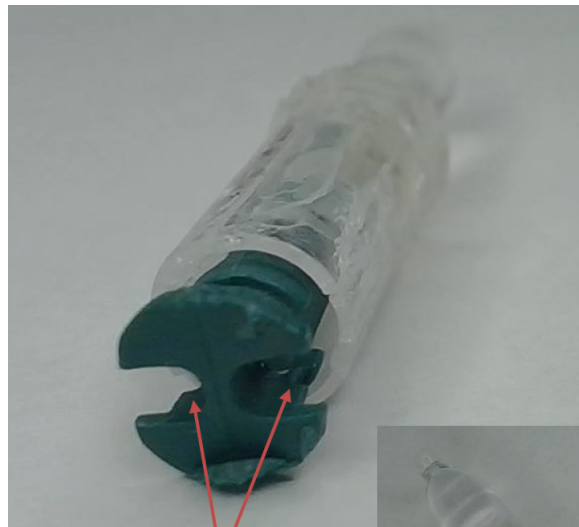
3 Lighting assembly with shroud removed:



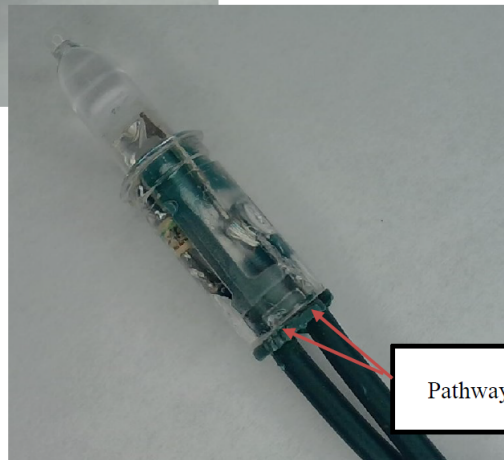
1 46. At least one of the base module and the cap module of the Accused Product are
2 configured such that assembling the base module to the cap module results in compression that
3 provides a first water-resistant seal between the cap module and the base module at a first end of the
4 internal cavity.



1 47. When the base module of the Accused Product is assembled to the cap module, the
2 base module defines at least two lumens extending longitudinally through at least a portion of the
3 base module, each of the at least two lumens being configured to provide a pathway for an insulated
4 conductor from the outside of the water-resistant LED capture device to the internal cavity to supply
5 electrical energy to the light-emitting device therein.



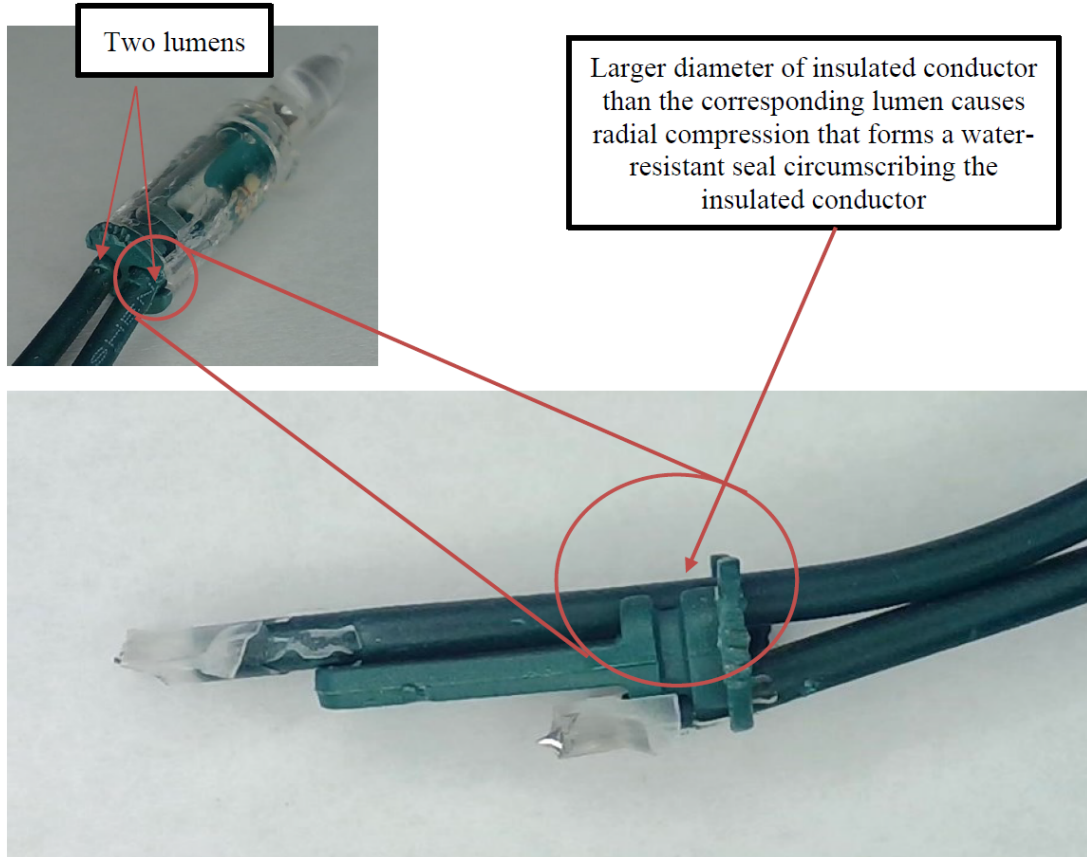
Two lumens



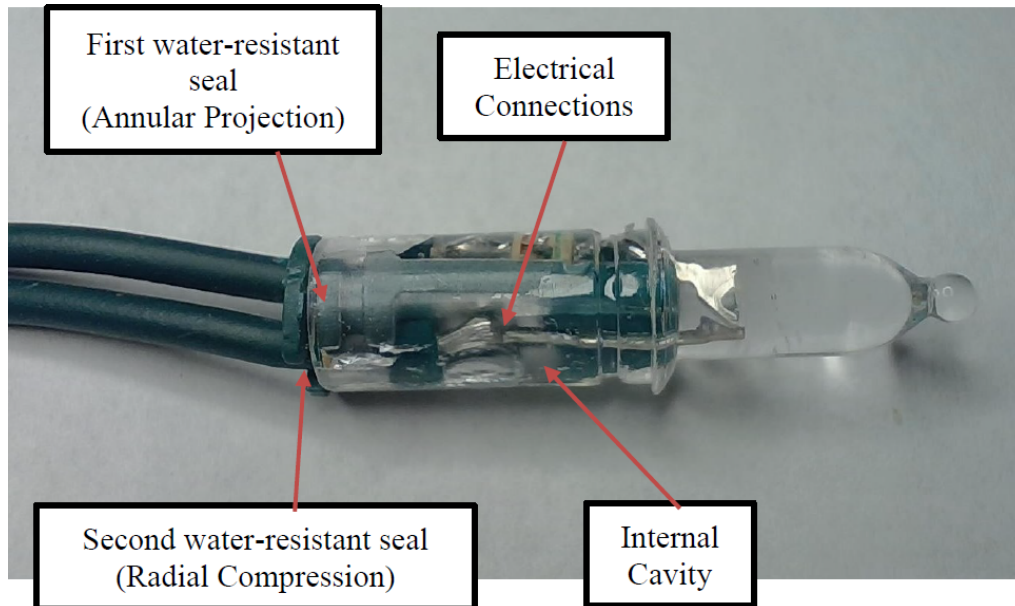
Pathways

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1 48. Assembling the cap module of the Accused Product to the base module introduces a
2 radial compression that forms a second water-resistant seal circumscribing each of the insulated
3 conductors in the corresponding at least two lumens.



1 49. A plurality of water-resistant seals, comprising the first water-resistant seal and the
 2 second water-resistant seal, substantially seal the internal cavity of the Accused Product such that
 3 electrical connections of the insulated conductors to the received light-emitting device are sealed
 4 within the internal cavity.



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15 50. The full extent of Defendant’s infringement is not presently known to S4. S4 makes
16 this preliminary identification of infringing products and infringed claims in Count Three without
17 the benefit of discovery or claim construction in this action, and expressly reserves the right to
18 augment, supplement, and revise its identifications based on additional information obtained through
19 discovery or otherwise.

20 51. S4 has suffered damages, including specifically lost profits, as a result of Defendant’s
21 infringement of the ’385 Patent in an amount to be determined at trial.

22 52. Defendant’s infringement of the ’385 Patent is causing irreparable harm for which S4
23 has no adequate remedy at law unless Defendant is enjoined by this Court. Under 35 U.S.C. § 283,
24 S4 is entitled to a permanent injunction against further infringement of the ’385 Patent.

25 **COUNT FOUR**

26 **INDIRECT INFRINGEMENT OF U.S. PATENT NO. 11,454,385**

27 53. Plaintiff incorporates by reference the allegations in paragraphs 1-52 as if fully set
28 forth herein.

1 54. Defendant has had knowledge of the '385 patent since at least the time it was served
2 with the Complaint in this lawsuit.

3 55. In addition to directly infringing the '385 Patent, as discussed above with respect to
4 Count Three, Defendant knew or was willfully blind to the fact that it was inducing infringement of
5 the '385 Patent under 35 U.S.C. § 271(b) by instructing, encouraging, directing, and requiring third
6 parties, including its customers, to indirectly infringe by using the Accused Product in the United
7 States.

8 56. Defendant knowingly and actively aided and abetted, encouraged, and contributed to
9 the indirect infringement of the '385 Patent by instructing and encouraging its customers,
10 purchasers, users, vendors, partners, and manufacturers to meet the elements of the '385 Patent with
11 the Accused Product, as described above. Such instructions and encouragement included, but is not
12 limited to, advising third parties to use the Accused Product in an infringing manner by advertising
13 and promoting the use of the Accused Product in an infringing manner.

14 57. The full extent of Defendant's indirect infringement is not presently known to S4. S4
15 makes this preliminary identification of infringing products and infringed claims in Count Four
16 without the benefit of discovery or claim construction in this action, and expressly reserves the right
17 to augment, supplement, and revise its identifications based on additional information obtained
18 through discovery or otherwise.

19 58. S4 has suffered damages, including specifically lost profits, as a result of Defendant's
20 indirect infringement of the '385 Patent in an amount to be determined at trial.

21 59. Defendant's indirect infringement of the '385 Patent is causing irreparable harm for
22 which S4 has no adequate remedy at law unless Defendant is enjoined by this Court. Under 35
23 U.S.C. § 283, S4 is entitled to a permanent injunction against further infringement of the '385
24 Patent.

25 **PRAYER FOR RELIEF**

26 WHEREFORE, S4 prays for the following judgments and relief:

27 (a) A judgment that Defendant has directly and/or indirectly infringed and is infringing the
28 Patents-in-Suit;

1 (b) A permanent injunction against Defendant and its affiliates, subsidiaries, assigns,
2 employees, agents or anyone acting in privity or concert from directly and/or indirectly infringing
3 the Patents-in-Suit, including enjoining the making, offering to sell, selling, using, or importing into
4 the United States products claimed in any of the claims of the Patents-in-Suit; using or performing
5 methods claimed in any of the claims of the Patents-in-Suit; inducing others to use and perform
6 methods that infringe any claim of the Patents-in-Suit; or contributing to others using and
7 performing methods that infringe any claim of the Patents-in-Suit; until the expiration of the Patents-
8 in-Suit;

9 (c) An award of damages adequate to compensate S4 for Defendant's direct and/or indirect
10 patent infringement, and an accounting to adequately compensate S4 for the infringement, including,
11 but not limited to, lost profits and/or a reasonable royalty;

12 (d) An award of pre-judgment and post-judgment interest at the maximum rate allowed by
13 law;

14 (e) An order finding that this is an exceptional case and awarding S4 its costs, expenses,
15 disbursements, and reasonable attorneys' fees related to Defendant's direct and/or indirect patent
16 infringement under 35 U.S.C. 285 and all other applicable statutes, rules, and common law; and

17 (f) Such other further relief, in law or equity, as this Court deems just and proper.

18 **JURY TRIAL**

19 In accordance with Rule 38 of the Federal Rules of Civil Procedure, S4 hereby demands a
20 jury trial on all issues triable before a jury.

1 Dated: November 14, 2023

2 Respectfully submitted,

3
4 /s/ Almuhtada Smith

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