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10 Koji IP, LLC

11  
12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
14 **WESTERN DIVISION**

15 KOJI IP, LLC,

16 Plaintiff,

17 v.

18 GURU WIRELESS, INC.

19 Defendant.

Case No.: 2:24-cv-03713

**PLAINTIFF’S COMPLAINT FOR  
PATENT INFRINGEMENT**

**(35 U.S.C. § 271)**

**JURY TRIAL DEMANDED**

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23 Koji IP, LLC (“Plaintiff” or “Koji”) files this Original Complaint and  
24 demand for jury trial seeking relief from patent infringement of the claims of U.S.  
25 Patent No. 10,790,703 (“the ’703 patent”) (referred to as the “Patent-in-Suit”) by Guru  
26 Wireless Inc. (“Defendant” or “Guru”).  
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1       **I.       THE PARTIES**

2           1. Plaintiff is a Texas Limited Liability Company with its principal place of  
3 business located in Travis County, Texas.

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5           2. On information and belief, Defendant is a corporation organized and existing  
6 under the laws of the State of Delaware, with a regular and established place of  
7 business located at 150 E. Colorado Boulevard, Suite 201, Pasadena, CA, 91105.

8  
9           3. On information and belief, Defendant sells and offers to sell products and  
10 services throughout California, including in this judicial district, and introduces  
11 products and services that perform infringing methods or processes into the stream of  
12 commerce knowing that they would be sold in California and this judicial district.  
13 Defendant can be served with process through their registered agent, Florian Bohn,  
14 556 Milton Drive, Pasadena, California 91775, at its place of business, or anywhere  
15 else it may be found.  
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18       **II.       JURISDICTION AND VENUE**

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20           4. This Court has original subject-matter jurisdiction over the entire action  
21 pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an  
22 Act of Congress relating to patents, namely, 35 U.S.C. § 271.

23  
24           5. This Court has personal jurisdiction over Defendant because: (i) Defendant is  
25 present within or has minimum contacts within the State of California and this judicial  
26 district; (ii) Defendant has purposefully availed itself of the privileges of conducting  
27 business in the State of California and in this judicial district; and (iii) Plaintiff's cause  
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1 of action arises directly from Defendant’s business contacts and other activities in the  
2 State of California and in this judicial district.

3  
4 6. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b).  
5 Defendant has committed acts of infringement and has a regular and established place  
6 of business in this District. Further, venue is proper because Defendant conducts  
7  
8 substantial business in this forum, directly or through intermediaries, including: (i) at  
9 least a portion of the infringements alleged herein; and (ii) regularly doing or  
10 soliciting business, engaging in other persistent courses of conduct and/or deriving  
11  
12 substantial revenue from goods and services provided to individuals in California and  
13 this District.

14 **III. INFRINGEMENT - Infringement of the ’703 Patent**

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16 7. On September 29, 2020, U.S. Patent No. 10,790,703 (“the ’703 patent”,  
17 included as Exhibit A and part of this complaint) entitled “Smart wireless power  
18 transfer between devices” was duly and legally issued by the U.S. Patent and  
19 Trademark Office. Plaintiff owns the ’703 patent by assignment.

20  
21 8. The ’703 patent relates to novel and improved methods and systems for  
22 wireless power charging.  
23

24 9. Defendant maintains, operates, and administers systems, products, and services  
25 that infringes one or more of claims 1-4 of the ’703 patent, literally or under the  
26 doctrine of equivalents. Defendant put the inventions claimed by the ’703 Patent into  
27 service (i.e., used them); but for Defendant’s actions, the claimed-inventions  
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1 embodiments involving Defendant's products and services would never have been  
2 put into service. Defendant's acts complained of herein caused those claimed-  
3 invention embodiments as a whole to perform, and Defendant's procurement of  
4 monetary and commercial benefit from it.  
5

6 10.Support for the allegations of infringement may be found in the chart attached  
7 as Exhibit B. These allegations of infringement are preliminary and are therefore  
8 subject to change.  
9

10 11.Defendant has and continues to induce infringement. Defendant has actively  
11 encouraged or instructed others (e.g., its customers and/or the customers of its related  
12 companies), and continues to do so, on how to use its products and services (e.g., for  
13 wireless power charging) such as to cause infringement of one or more of claims 1-4  
14 of the '703 patent, literally or under the doctrine of equivalents. Moreover, Defendant  
15 has known of the '703 patent and the technology underlying it from at least the filing  
16 date of the lawsuit.<sup>1</sup> For clarity, direct infringement is previously alleged in this  
17 complaint.  
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21 12.Defendant has and continues to contributorily infringe. Defendant has actively  
22 encouraged or instructed others (e.g., its customers and/or the customers of its related  
23 companies), and continues to do so, on how to use its products and services (e.g., for  
24 wireless power charging) and related services such as to cause infringement of one or  
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27 \_\_\_\_\_  
28 <sup>1</sup> Plaintiff reserves the right to amend and add inducement pre-suit if discovery reveals an earlier date of knowledge.

1 more of claims 1-4 of the '703 patent, literally or under the doctrine of equivalents.  
2 Further, there are no substantial non-infringing uses for Defendant's products and  
3 services. Moreover, Defendant has known of the '703 patent and the technology  
4 underlying it from at least the filing date of the lawsuit.<sup>2</sup> For clarity, direct  
5 infringement is previously alleged in this complaint.  
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7  
8 13. Defendant has caused and will continue to cause Plaintiff damage by direct and  
9 indirect infringement of (including inducing infringement of) the claims of the '703  
10 patent.  
11

#### 12 **IV. CONDITIONS PRECEDENT**

13 14. Plaintiff is a non-practicing entity, with no products to mark. Plaintiff has pled  
14 all statutory requirements to obtain pre-suit damages. Further, all conditions  
15 precedent to recovery are met.  
16

#### 17 **V. JURY DEMAND**

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19 Plaintiff hereby requests a trial by jury on issues so triable by right.

#### 20 **VI. PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff prays for relief as follows:  
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- 23 a. enter judgment that Defendant has infringed the claims of the '703 patent;  
24 b. award Plaintiff damages in an amount sufficient to compensate it for  
25 Defendant's infringement of the Patents-in-Suit in an amount no less than a  
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27 \_\_\_\_\_  
28 <sup>2</sup> Plaintiff reserves the right to amend and add inducement pre-suit if discovery reveals an earlier date of knowledge.

- 1 reasonable royalty or lost profits, together with pre-judgment and post-  
2 judgment interest and costs under 35 U.S.C. § 284;
- 3
- 4 c. award Plaintiff an accounting for acts of infringement not presented at trial and  
5 an award by the Court of additional damage for any such acts of infringement;
- 6 d. declare this case to be “exceptional” under 35 U.S.C. § 285 and award Plaintiff  
7 its attorneys’ fees, expenses, and costs incurred in this action;
- 8
- 9 e. provided discovery reveals that Defendant knew (1) knew of the patent-in-suit  
10 prior to the filing date of the lawsuit; (2) after acquiring that knowledge, it  
11 infringed the patent; and (3) in doing so, it knew, or should have known, that  
12 its conduct amounted to infringement of the patent, declare Defendants’  
13 infringement to be willful and treble the damages, including attorneys’ fees,  
14 expenses, and costs incurred in this action and an increase in the damage award  
15 pursuant to 35 U.S.C. § 284;
- 16
- 17
- 18 f. a decree addressing future infringement that either (i) awards a permanent  
19 injunction enjoining Defendant and its agents, servants, employees, affiliates,  
20 divisions, and subsidiaries, and those in association with Defendant from  
21 infringing the claims of the Patents-in-Suit, or (ii) awards damages for future  
22 infringement in lieu of an injunction in an amount consistent with the fact that  
23 for future infringement the Defendant will be an adjudicated infringer of a valid  
24 patent, and trebles that amount in view of the fact that the future infringement  
25 will be willful as a matter of law; and  
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1 g. award Plaintiff such other and further relief as this Court deems just and proper.

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Dated: May 3, 2024

Respectfully submitted,

RAMEY LLP

/s/ Susan S.Q. Kalra

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**DEMAND FOR JURY TRIAL**

Plaintiff hereby requests a trial by jury on issues so triable by right.

Dated: May 3, 2024

Respectfully submitted,

**RAMEY LLP**

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