

1 Thomas A. Runk (SBN101306)
2 trunk@brookskushman.com
3 BROOKS KUSHMAN P.C.
4 445 S. Figueroa St., Suite 3100
5 Los Angeles, CA 90071-1635
6 Tel: 562-708-3520

7 Christopher C. Smith (SBN238882)
8 csmith@brookskushman.com
9 BROOKS KUSHMAN P.C.
10 150 W. Second St., Suite 400N
11 Royal Oak, MI 48067
12 Tel: 248-358-4400

13 Attorneys for Plaintiff

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

FKA Distributing Co., LLC,
d/b/a Homedics

Case No. 8:24-CV-01035

Plaintiff,

**COMPLAINT FOR PATENT
INFRINGEMENT AND DEMAND
FOR JURY TRIAL**

v.

GuruNanda, LLC

Defendant.

1 Plaintiff, FKA Distributing Co., LLC d/b/a Homedics (hereinafter “Plaintiff”
2 or “Homedics”), by and through its undersigned counsel, for its Complaint herein
3 states as follows.

4 **I. PARTIES**

5 1. Plaintiff FKA Distributing Co., LLC d/b/a Homedics is a limited
6 liability company organized under the laws of Michigan, having a principal place of
7 business at 3000 Pontiac Trail, Commerce Township, Michigan 48390.

8 2. Upon information and belief, Defendant GuruNanda, LLC (hereinafter
9 “Defendant” or “GuruNanda”) is a Delaware Corporation, having a principal place
10 of business at 6645 Caballero Blvd., Buena Park, CA 90620, with its registered agent
11 located at Registered Agent Solutions, Inc., 5301 Southwest Parkway, Suite 400,
12 Austin, TX 78735.

13 **II. JURISDICTION AND VENUE**

14 3. This is an action for patent infringement arising under the Patent Laws
15 of the United States, Title 35, United States Code. The subject matter jurisdiction
16 for this Court is founded upon 28 U.S.C. § 1338 (patents) and 28 U.S.C. § 1331
17 (federal question).

18 4. Upon information and belief, Defendant is subject to this Court’s
19 jurisdiction because Defendant continuously engages in substantial sales and other
20 business transactions in this district. Defendant has sold infringing products,
21 imported infringing products and/or committed infringing acts in this district.
22 Furthermore, Defendant’s headquarters and/or principal place of business is located
23 in the Central District of California. The United States District Court for the Central
24 District of California therefore has *in personam* jurisdiction over Defendant.

25 5. Venue is proper in this district pursuant to 28 U.S.C. §1400(b).
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1 **III. THE INFRINGED PATENTS**

2 6. On December 4, 2007, U.S. Patent No. 7,303,300 (“the 300 patent”)
3 titled “Methods and Systems for Illuminating Household Products” was duly and
4 legally issued. (Exhibit A, U.S. Patent No. 7,303,300.)

5 7. On January 26, 2010, U.S. Patent No. 7,652,436 (“the 436 patent”)
6 titled “Methods and Systems for Illuminating Household Products” was duly and
7 legally issued. (Exhibit B, U.S. Patent No. 7,652,436.)

8 8. The 300 patent and the 436 patent are collectively referred to herein as
9 the Patents-in-Suit.

10 9. Homedics is the owner of all right, title, and interest in the Patents-in-
11 Suit, including the right to sue and recover for past infringement.

12 10. Homedics is a leader in personal health and wellness products,
13 including aromatherapy devices sold under its Homedics brand.

14 11. Defendant had knowledge of the Patents-in-Suit. Defendant is well-
15 aware of Homedics and its products. Defendant and Homedics are also competitors
16 for sales of certain products and/or product categories.

17 **IV. COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,303,300**

18 12. Homedics realleges the preceding paragraphs as though set forth fully
19 herein.

20 13. Defendant has made, used, offered for sale, imported, and sold in the
21 United States lighted aromatherapy diffusers, such as but not limited to the Modern
22 Diffuser, Saltair Lamp & Essential Oil Diffuser, and The Woodsy Diffuser, each
23 sold under the GuruNanda brand (hereinafter “Diffusers”) as shown below:
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11 14. Defendant’s activities have infringed, induced others to infringe, and/or
12 contributorily infringed the 300 patent

13 15. By making, using, offering for sale, and/or selling the Diffusers in the
14 United States, Defendant infringed at least claim 17 of the 300 patent, under at least
15 35 U.S.C. § 271(a), (b), and/or (c) as explained below.

16 16. The Diffusers are sold online on at least GuruNanda’s website under
17 “Aromatherapy” webpage. The Diffusers are marketed as ultrasonic diffusers and
18 described as providing a pleasant and long-lasting aroma mist.

19 17. The instructions packaged with each Diffuser also instruct users to
20 “[a]dd 2-3 drops of your choice essential oil directly into the water tank.”

21 18. The instructions packaged with each Diffuser also market GuruNanda’s
22 essential oil products and provide GuruNanda’s website, which markets and sells
23 essential oils.

24 19. As shown below, the Diffusers include a container for adding water and
25 essential oil.
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20. The Diffusers each include a light system disposed proximate the container and the light system is controlled by a processor for generating variable color radiation, as shown by representative images below.



LIGHT BUTTON: 1st Press: Turn on revolving colors.
 2nd Press: Fix on the color currently displaying. 3rd-15th Press: Cycle through another specific color by per press.
OFF: Press and hold for 2 seconds to shut down (turn off mist, turn off lights.)



21. As such, Defendant's aromatherapy Diffuser infringes at least claim 17 of the 300 patent, which states:

1 17. A system for providing illumination for a household fluid
2 product not intended for human consumption and/or a container that
3 contains the household fluid product, the system comprising:

4 at least one light system, comprising at least one light source
5 controllable by a processor for generating a variable color radiation, the
6 light system disposed proximate to the container and configured to
7 generate a selected color of the variable color radiation in response to a
8 signal from the processor to illuminate the container and/or the
9 household fluid product with the selected color of the variable color
10 radiation.

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12 22. Defendant's activities also constituted infringement of other claims of
13 the 300 patent. Plaintiff has suffered damages as a result of the infringing activities
14 of Defendant.

15 23. Upon information and belief, Defendant is aware of its competitor
16 Homedics and was aware of the 300 patent as well as its infringement thereof.

17 24. Even though Defendant was aware of Homedics patent, Defendant
18 continued its infringement of the 300 patent thereafter. Defendant's infringement
19 was willful, wanton, and deliberate.

20 25. Defendant actively induced others to infringe and has contributorily
21 infringed the 300 patent. For example, Defendant induced or contributed to others'
22 infringement by the instructions provided for operating its diffuser products.
23 Defendant contributed to others' infringement by supplying its aromatherapy
24 diffuser products that are intended to be used with essential oils.

25 26. On information and belief, Plaintiff expects future evidentiary support
26 for these infringement allegations will be shown upon further examination and after
27 a reasonable opportunity for further investigation and discovery. Furthermore,
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1 Plaintiff expects that other products of the Defendant also infringed claims of the
2 300 patent.

3 27. Plaintiff has suffered damages as a result of the infringing activities of
4 Defendant.

5 **V. COUNT II – INFRINGEMENT OF U.S. PATENT NO. 7,652,436**

6 28. Homedics realleges the preceding paragraphs as though set forth fully
7 herein.

8 29. Defendant has made, used, offered for sale, imported, and sold in the
9 United States lighted aromatherapy diffusers, such as but not limited to the Modern
10 Diffuser, Saltair Lamp & Essential Oil Diffuser, and The Woodsy Diffuser, each
11 sold under the GuruNanda brand as shown below:



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20 30. Defendant’s activities have infringed, induced others to infringe, and/or
21 contributorily infringed the 436 patent.

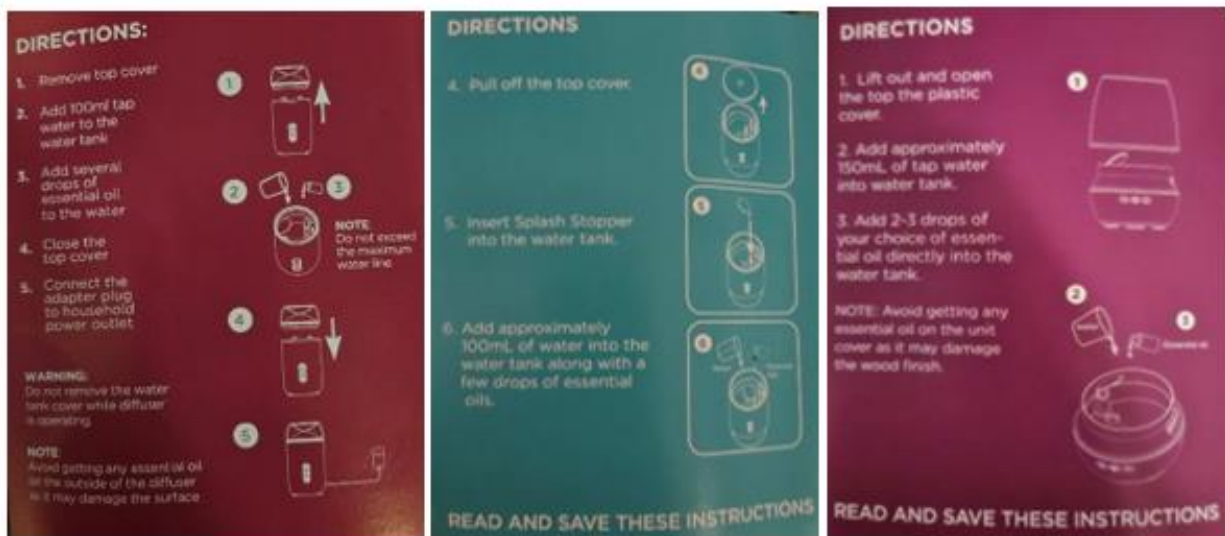
22 31. By making, using, offering for sale, and/or selling the Diffusers in the
23 United States, Defendant infringed at least claim 6 of the 436 patent, under at least
24 35 U.S.C. § 271(a), (b), and/or (c) as explained below.

25 32. The Diffusers are sold online at least through GuruNanda’s website
26 under “Aromatherapy” webpage. The Diffusers are marketed as ultrasonic diffusers
27 and described as providing a pleasant and long-lasting aroma mist.
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1 33. The instructions packaged with each Diffuser also instruct users to
2 “[a]dd 2-3 drops of your choice essential oil directly into the water tank.”

3 34. The instructions packaged with each Diffuser also market GuruNanda’s
4 essential oil products and provide GuruNanda’s website, which markets and sells
5 essential oils.

6 35. As shown below, the Diffusers include a scent-producing facility and
7 instructs a user to add a scent producing product such as essential oil.



17 36. The Diffusers each include a light system disposed proximate the scent-
18 producing facility and the light system is controlled by a processor for generating
19 variable color radiation, as shown by representative images below.
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LIGHT BUTTON: 1st Press: Turn on revolving colors.
2nd Press: Fix on the color currently displaying. 3rd-15th Press: Cycle through another specific color by per press.
OFF: Press and hold for 2 seconds to shut down (turn off mist, turn off lights.)



37. As such, Defendant's aromatherapy Diffuser infringes at least claim 6 of the 436 patent, which states:

6. An apparatus, comprising:

a scent-producing facility that includes a scent-producing product; and

at least one light system comprising at least one light source controllable by a processor for generating radiation of one or more colors and/or one or more brightness levels, the at least one light system disposed proximate to the scent-producing facility and configured to generate at least one selected color of the radiation in response to the signal from the processor.

38. Defendant's activities also constitute infringement of other claims of the 436 patent. Plaintiff has suffered damages as a result of the infringing activities of Defendant.

1 39. Upon information and belief, Defendant is aware of its competitor
2 Homedics and was aware of the 436 patent as well as its infringement thereof.

3 40. Even though Defendant was aware of Homedics patent, Defendant has
4 continued its infringement of the 436 patent thereafter. Defendant's infringement
5 has been and continues willful, wanton, and deliberate.

6 41. Defendant actively induced others to infringe and has contributorily
7 infringed the 436 patent. For example, Defendant induced or contributed to others'
8 infringement by the instructions provided for operating its diffuser products.
9 Defendant contributed to others' infringement by supplying its aromatherapy
10 diffuser products that are intended to be used with essential oils.

11 42. On information and belief, Plaintiff expects future evidentiary support
12 for these infringement allegations will be shown upon further examination and after
13 a reasonable opportunity for further investigation and discovery. Furthermore,
14 Plaintiff expects that other products of the Defendant also infringed claims of the
15 436 patent.

16 43. Plaintiff has suffered damages as a result of the infringing activities of
17 Defendant.

18 **VI. DEMAND FOR RELIEF**

19 In accordance with the foregoing, Plaintiff respectfully demands that this
20 Court enter judgment:

21 A. Declaring that Defendant has infringed the claims of the 300 patent and
22 that such infringement has been and continues to be willful;

23 B. Declaring that Defendant has infringed the claims of the 436 patent and
24 that such infringement has been and continues to be willful;

25 C. Awarding Plaintiff its damages, together with prejudgment interest and
26 costs, and increasing those damages to three times the amount found or assessed as
27 provided by 35 U.S.C. § 284;

1 D. Declaring this an exceptional case within the meaning of 35 U.S.C.
2 § 285, and awarding Plaintiff its reasonable attorneys’ fees and costs and
3 disbursements in this action; and

4 E. Granting to Plaintiff such other and further relief as this Court deems
5 reasonable.

6 **VII. DEMAND FOR JURY TRIAL**

7 Homedics respectfully demands a trial by jury of any and all issues triable of
8 right by a jury in the above-captioned action.

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10 DATED: May 13, 2024

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By: /s/ Thomas A. Runk
Thomas A. Runk (SBN101306)
trunk@brookskushman.com
BROOKS KUSHMAN P.C.
445 S. Figueroa St., Suite 3100
Los Angeles, CA 90071-1635
Tel: 562-708-3520

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Christopher C. Smith (SBN238882)
csmith@brookskushman.com
BROOKS KUSHMAN P.C.
150 W. Second St., Suite 400N
Royal Oak, MI 48067
Tel: 248-358-4400

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Attorneys for Plaintiff

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