

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<p><b>WANGS ALLIANCE CORPORATION d/b/a WAC LIGHTING,</b></p> <p style="text-align: center;"><b>Plaintiff,</b></p> <p><b>v.</b></p> <p><b>MINKA LIGHTING, LLC,</b></p> <p style="text-align: center;"><b>Defendant.</b></p>
--

**Civil Action No. 1:24-cv-819**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Wangs Alliance Corporation d/b/a WAC Lighting (“WAC”), by and through its attorneys, alleges the following for its complaint against Minka Lighting, LLC (“Minka”).

**NATURE OF THE SUIT**

1. This is a civil action for infringement of United States Patent Nos. 8,791,494 (the “494 patent”), 9,076,930 (the “930 patent”), 9,837,581 (the “581 patent”), and 10,833,226 (the “226 patent”) (collectively, the “Patents-in-Suit”). The action arises under the laws of the United States related to patents, including 35 U.S.C. § 281.

2. Minka and WAC are direct competitors. Minka has been infringing WAC’s patents for years. In September 2023, WAC was forced to initiate an investigation in the United States International Trade Commission based on Minka’s infringement of several of WAC’s patents directed to smart fan technology. The ITC matter is currently pending. This case is

brought on another set of WAC's patents directed to LED technology, which Minka sweepingly and continuously infringes as it does the patents asserted in the ITC matter.

### **PARTIES**

3. Plaintiff Wangs Alliance Corporation d/b/a WAC Lighting is a New York corporation with its principal place of business in the State of New York.

4. Defendant Minka Lighting, LLC is a California limited liability company and maintains its principal place of business in this District.

### **JURISDICTION AND VENUE**

5. This action arises under the patent laws of the United States, 35 U.S.C. § 271, *et seq.* Accordingly, this Court has exclusive subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Minka in this action because Minka's self-proclaimed principal place of business is in this District. Minka's Statement of Information filed on December 5, 2023 (Exhibit A) lists the company's principal address in this District, and both managers or members identified in this document are in this District. Consistent with that Statement of Information, in a recent complaint filed by Minka against WAC, Minka identified its principal place of business as situated in Virginia, at a location within this District.

7. Minka has also committed acts within this District giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Minka would not offend traditional notions of fair play and substantial justice. Minka, directly and/or through subsidiaries, affiliates, or intermediaries (including distributors, retailers, and

others), has committed and continues to commit acts of infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the Patents-in-Suit.

8. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400. Minka resides in this District because this District is where Minka's principal place of business is located. Further, upon information and belief, Minka has transacted business in this District and has committed acts of infringement in this District.

### **WAC'S PATENTS**

9. A family company, WAC is headquartered in the United States. For almost forty years, WAC has operated at the forefront of emerging technologies, producing quality LED lighting solutions that are energy efficient, long lasting, and maintenance free, and promoting green technology.

10. WAC elevates the industry in design and manufacturing by challenging conventions and building sustainable products responsibly. Over the years, its investment in electronics development, research and test laboratories, and assembly facilities has culminated into a unique and unparalleled world-class brand, renowned for quality and ingenuity in the industry. Its award-winning portfolio of architectural products, decorative lighting, landscape lighting, and smart ceiling fans focuses on addressing known problems or meeting unfulfilled needs with lighting and fan solutions in commercial, residential, and hospitality settings.

11. WAC's portfolio of patents protects its proprietary designs and technologies and its position in the marketplace. Its patents play an important role in maintaining WAC's brand and reputation as an innovator and a visionary in the lighting and fans space. WAC therefore

takes protection of its intellectual property very seriously and is determined to put a stop to any unauthorized use of its patented technology by others, by any lawful means at its disposal.

12. Among WAC's patents is the '494 patent, entitled "Light Emitting Device and Light Emitting Device Package," which was duly issued by the U.S. Patent Office on July 29, 2014. A copy of the '494 patent is attached hereto as Exhibit B.

13. Among WAC's patents is the '930 patent, entitled "Light Emitting Device and Light Emitting Device Package," which was duly issued by the U.S. Patent Office on July 7, 2015. A copy of the '930 patent is attached hereto as Exhibit C.






14. Among WAC's patents is the '581 patent, entitled "Light Emitting Device and Light Emitting Device Package," which was duly issued by the U.S. Patent Office on December 5, 2017. A copy of the '581 patent is attached hereto as Exhibit D.






15. Among WAC's patents is the '226 patent, entitled "Light Emitting Device and Light Emitting Device Package," which was duly issued by the U.S. Patent Office on November 10, 2020. A copy of the '226 patent is attached hereto as Exhibit E.






16. WAC owns all right, title, and interest in and to the Patents-in-Suit.




17. A wide range of Minka's products, including, without limitation, Minka's smart ceiling fans, utilizes the technology of the Patents-in-Suit (the "Accused Products").

18. Exemplary Accused Products are shown below:

Accused Product	Product Image
<p>Name: Dyno XL                      Model Family: F1001                      Brand: MinkaAire</p>	
<p>Name: Concept IV                      Model Family: F465L                      Brand: MinkaAire</p>	
<p>Name: Concept III                      Model Family: F467L                      Brand: MinkaAire</p>	
<p>Name: Seacrest                      Model Family: F675L                      Brand: MinkaAire</p>	
<p>Name: Twist                      Model Family: F678L                      Brand: MinkaAire</p>	

Accused Product	Product Image
<p>Name: Curl                      Model Family: F714L                      Brand: MinkaAire</p>	
<p>Name: Molino                      Model Family: F742L                      Brand: MinkaAire</p>	
<p>Name: Java Xtreme                      Model Family: F754L                      Brand: MinkaAire</p>	
<p>Name: Ellipse                      Model Family: F771L                      Brand: MinkaAire</p>	
<p>Name: Chubby                      Model Family: F781L                      Brand: MinkaAire</p>	

Accused Product	Product Image
<p>Name: Chubby II                      Model Family: F782L                      Brand: MinkaAire</p>	
<p>Name: Barn                      Model Family: F864L                      Brand: MinkaAire</p>	
<p>Name: Barn H20                      Model Family: F865L                      Brand: MinkaAire</p>	
<p>Name: Sleek                      Model Family: F868L                      Brand: MinkaAire</p>	
<p>Name: Windmolen                      Model Family: F870L                      Brand: MinkaAire</p>	

Accused Product	Product Image
Name: Artemis Model Family: F803DL Brand: MinkaAire	
Name: Timber Model Family: F747L Brand: MinkaAire	
Name: Light Wave Model Family: F844 F845, F848 Brand: MinkaAire	

19. WAC brings this lawsuit against Minka to put a stop to Minka’s continuous unauthorized use of the patented inventions owned by WAC and Minka’s anti-competitive practices stemming from Minka’s infringement of WAC’s intellectual property rights.

**FIRST CLAIM**  
**(Infringement of United States Patent No. 8,791,494 by Minka)**

20. The allegations stated in preceding paragraphs are incorporated by reference as though fully set forth herein.

21. WAC is the owner of the ’494 patent.



22. Minka makes, uses, sells, offers to sell, and/or imports the Accused Products, which infringe the '494 patent.

23. As demonstrated in the exemplary infringement claim chart for the Minka Sleek LED 60" Smart Fan (Model No. F868L-ORB), attached hereto as Exhibit F, the Accused Products contain all of the elements of at least claim 1 of the '494 patent, as arranged in that claim.

24. In addition to its acts of direct infringement, Minka also has indirectly infringed the '494 patent by actively inducing its customers to directly infringe the '494 patent.

25. Upon information and belief, Minka has had actual knowledge of the '494 patent prior to the filing of this Complaint. For example, WAC asserted the '494 patent in December against VC Brands LLC and Tech Lighting LLC d/b/a Visual Comfort & Co. ("VCC") in the United States District Court for the District of Delaware. VCC and Minka are co-respondents in a pending ITC investigation initiated by WAC in September 2023, where other WAC patents are asserted. Minka therefore must have learned of the '494 patent at least from VCC.

26. Upon information and belief, Minka induces its customers to infringe at least claim 1 of the '494 patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable Minka's Accused Products. Upon information and belief, Minka's customers who purchase Minka's Accused Products and use or re-sell Minka's Accused Products infringe at least claim 1 of the '494 patent literally and/or under the doctrine of

equivalents. Upon information and belief, Minka knew or should have known that the induced acts constitute direct infringement.

27. By making, using, testing, offering for sale, selling, and/or importing the Accused Products, and by actively inducing others to use or re-sell Minka's Accused Products, Minka has injured WAC and is liable to WAC for infringing one or more claims of the '494 patent, including at least claim 1, pursuant to 35 U.S.C. § 271(a) and (b), literally or under the doctrine of equivalents.

28. WAC has been damaged by Minka's infringement of the '494 patent and is suffering and will continue to suffer irreparable harm and damage as a result of this infringement unless such infringement is enjoined by this Court.

**SECOND CLAIM**  
**(Infringement of United States Patent No. 9,076,930 by Minka)**

29. The allegations stated in preceding paragraphs are incorporated by reference as though fully set forth herein.

30. WAC is the owner of the '930 patent.

31. Minka makes, uses, sells, offers to sell, and/or imports the Accused Products, which infringe the '930 patent.

32. As demonstrated in the exemplary infringement claim chart for the Minka Sleek LED 60" Smart Fan (Model No. F868L-ORB), attached hereto as Exhibit G, the Accused Products contain all of the elements of at least claim 1 of the '930 patent, as arranged in that claim.

33. In addition to its acts of direct infringement, Minka also has indirectly infringed the '930 patent by actively inducing its customers to directly infringe the '930 patent.

34. Upon information and belief, Minka has had actual knowledge of the '930 patent prior to the filing of this Complaint. For example, WAC asserted the '930 patent in December against VC Brands LLC and Tech Lighting LLC d/b/a Visual Comfort & Co. ("VCC"), in the United States District Court for the District of Delaware. VCC and Minka are co-respondents in a pending ITC investigation initiated by WAC in September 2023, where other WAC patents are asserted. Minka therefore must have learned of the '930 patent at least from VCC.

35. Upon information and belief, Minka induces its customers to infringe at least claim 1 of the '930 patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable Minka's Accused Products. Upon information and belief, Minka's customers who purchase Minka's Accused Products and use or re-sell Minka's Accused Products infringe at least claim 1 of the '930 patent literally and/or under the doctrine of equivalents. Upon information and belief, Minka knew or should have known that the induced acts constitute direct infringement.

36. By making, using, testing, offering for sale, selling, and/or importing the Accused Products, and by actively inducing others to use or re-sell Minka's Accused Products, Minka has injured WAC and is liable to WAC for infringing one or more claims of the '930 patent, including at least claim 1, pursuant to 35 U.S.C. § 271(a) and (b), literally or under the doctrine of equivalents.

37. WAC has been damaged by Minka's infringement of the '930 patent and is suffering and will continue to suffer irreparable harm and damage as a result of this infringement unless such infringement is enjoined by this Court.

**THIRD CLAIM**  
**(Infringement of United States Patent No. 9,837,581 by Minka)**

38. The allegations stated in preceding paragraphs are incorporated by reference as though fully set forth herein.

39. WAC is the owner of the '581 patent.

40. Minka makes, uses, sells, offers to sell, and/or imports the Accused Products, which infringe the '581 patent.

41. As demonstrated in the exemplary infringement claim chart for the Minka Sleek LED 60" Smart Fan (Model No. F868L-ORB), attached hereto as Exhibit H, the Accused Products contain all of the elements of at least claim 1 of the '581 patent, as arranged in that claim.

42. In addition to its acts of direct infringement, Minka also has indirectly infringed the '581 patent by actively inducing its customers to directly infringe the '581 patent.

43. Upon information and belief, Minka has had actual knowledge of the '581 patent prior to the filing of this Complaint. For example, WAC asserted the '581 patent in December against VC Brands LLC and Tech Lighting LLC d/b/a Visual Comfort & Co. ("VCC"), in the United States District Court for the District of Delaware. VCC and Minka are co-respondents in a pending ITC investigation initiated by WAC in September 2023, where other WAC patents are asserted. Minka therefore must have learned of the '581 patent at least from VCC.

44. Upon information and belief, Minka induces its customers to infringe at least claim 1 of the '581 patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable Minka's Accused Products. Upon information and belief, Minka's customers who purchase Minka's Accused Products and use or re-sell Minka's Accused Products infringe at least claim 1 of the '581 patent literally and/or under the doctrine of equivalents. Upon information and belief, Minka knew or should have known that the induced acts constitute direct infringement.

45. By making, using, testing, offering for sale, selling, and/or importing the Accused Products, and by actively inducing others to use or re-sell Minka's Accused Products, Minka has injured WAC and is liable to WAC for infringing one or more claims of the '581 patent, including at least claim 1, pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents.

46. WAC has been damaged by Minka's infringement of the '581 patent, and is suffering and will continue to suffer irreparable harm and damage as a result of this infringement unless such infringement is enjoined by this Court.

**FOURTH CLAIM**  
**(Infringement of United States Patent No. 10,083,226 by Minka)**

47. The allegations stated in preceding paragraphs are incorporated by reference as though fully set forth herein.

48. WAC is the owner of the '226 patent.

49. Minka makes, uses, sells, offers to sell, and/or imports the Accused Products, which infringe the '226 patent.

50. As demonstrated in the exemplary infringement claim chart for the Minka Sleek LED 60" Smart Fan (Model No. F868L-ORB), attached hereto as Exhibit I, the Accused Products contain all of the elements of at least claim 1 of the '226 patent, as arranged in that claim.

51. Upon information and belief, Minka has had actual knowledge of the '226 patent prior to the filing of this Complaint. For example, WAC asserted the '226 patent in December against VC Brands LLC and Tech Lighting LLC d/b/a Visual Comfort & Co. ("VCC"), in the United States District Court for the District of Delaware. VCC and Minka are co-respondents in a pending ITC investigation initiated by WAC in September 2023, where other WAC patents are asserted. Minka therefore must have learned of the '226 patent at least from VCC.

52. In addition to its acts of direct infringement, Minka also has indirectly infringed the '226 patent by actively inducing its customers to directly infringe the '226 patent.

53. Upon information and belief, Minka induces its customers to infringe at least claim 1 of the '226 patent with the specific intent to encourage their infringement by, among other things, marketing, creating, and/or distributing specifications, marketing materials, manuals, installation instructions, data sheets, application notes, and/or similar materials with instructions on using or rendering operable Minka's Accused Products. Upon information and belief, Minka's customers who purchase Minka's Accused Products and use or re-sell Minka's Accused Products infringe at least claim 1 of the '226 patent literally and/or under the doctrine of

equivalents. Upon information and belief, Minka knew or should have known that the induced acts constitute direct infringement.

54. By making, using, testing, offering for sale, selling, and/or importing the Accused Products, and by actively inducing others to use or re-sell Minka's Accused Products, Minka has injured WAC and is liable to WAC for infringing one or more claims of the '226 patent, including at least claim 1, pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents.

55. WAC has been damaged by Minka's infringement of the '226 patent and is suffering and will continue to suffer irreparable harm and damage as a result of this infringement unless such infringement is enjoined by this Court.

#### **PRAYER FOR RELIEF**

**WHEREFORE**, for the reasons set forth above, WAC respectfully requests that this Court enter judgment in its favor, and against Minka, and award relief including, but not limited to, the following:

- A. A judgment that Minka has infringed the '494, '930, '581, and '226 patents;
- B. An order permanently enjoining Minka and those in active concert or participation with it from further acts of infringement of the '494, '930, '581, and '226 patents;
- C. An award of damages adequate to compensate WAC for all of Minka's unauthorized acts of infringement;
- D. A declaration that this case is exceptional within the meaning of 35 U.S.C. § 285 and an award of WAC's reasonable attorneys' fees and other costs and expenses

incurred in the prosecution of this action;

E. An award of pre-judgment interest under 35 U.S.C. § 284, and post-judgment interest under 28 U.S.C. § 1961; and

F. An award of any other or further relief as this Court deems just and proper.

**JURY DEMAND**

WAC demands trial by jury of all issues so triable in this action.



Dated: May 15, 2024

*/s/ Byron L. Pickard*

Byron L. Pickard (VSB No. 47286)

Nirav N. Desai (VSB No. 72887)

**STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.**

1101 K St. NW, 10th Floor

Washington, DC 20005

Telephone: (202) 371-2600

Facsimile: (202) 371-2540

bpickard@sternekessler.com

ndesai@sternekessler.com

David C. Radulescu, Ph.D.

Etai Lahav

Bryon Wasserman

**RADULESCU LLP**

5 Penn Plaza, 19th Floor

New York, NY 10001

(646) 502-5950

david@radip.com

Deirdre M. Wells

**STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.**

1101 K St. NW, 10th Floor

Washington, DC 20005

Telephone: (202) 371-2600

Facsimile: (202) 371-2540

dwells@sternekessler.com

*Attorneys for Plaintiff*

*Wangs Alliance Corporation d/b/a WAC Lighting*