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18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 SEOUL VIOSYS CO., LTD., a *Korean*
21 *Corporation,*

22 Plaintiff,

23 v.

24 FEIT ELECTRIC CO., INC,

25 Defendant.

Case No. : 2:24-cv-4238

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

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COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Seoul Viosys Co., Ltd. (“Seoul Viosys”) for its Complaint against Defendant Feit Electric Co., Ltd. (“Feit”) allege as follows:

NATURE OF THE ACTION

1. Plaintiff Seoul Viosys bring this patent infringement action to protect its valuable patented technology relating to light emitting diodes (“LEDs”) and LED lighting. An LED is a semiconductor device that converts electrical energy into light. LEDs have many advantages over conventional light sources, including lower energy consumption, longer lifetime, and smaller size.

2. Seoul Viosys innovates in the area of LED technology. Seoul Viosys designs, manufactures and sells LEDs of varying wavelengths (e.g., visible light, near ultra-violet, and ultra-violet “UV”) for numerous applications and products, including televisions, monitors, lighting, curing, printing, counterfeit detection, disinfection, sensors, and analytical and medical instrument.

THE PARTIES

1. Plaintiff Seoul Viosys is a company organized and existing under the laws of the Republic of Korea, with its principal place of business at 65-16, Sandan-ro 163 beon-gil, Danwon-gu, Ansan-city, Gyeonggi-do, Korea 425-851.

2. Defendant Feit is a corporation organized and existing under the laws of the State of California with a principal place of business at 4901 Gregg Road, Pico Rivera, California 90660.

JURISDICTION AND VENUE

3. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a) because, at the very least, this action arises under the patent laws of the United States, including 35 U.S.C. § 271 et seq.

4. This Court has personal jurisdiction over Feit because it is a corporation organized and existing under the laws of the State of California with a principal place of business at 4901 Gregg Road, Pico Rivera, California 90660.

1 States Patent No. 9,929,314 entitled “Light Emitting Diode Chip Having Electrode
2 Pad” (“the ’314 patent”), including the right to sue and to recover for infringement
3 thereof. The ’314 patent was duly and legally issued on March 27, 2018, by the
4 United States Patent and Trademark Office to Kim et al. A copy of the ’314 patent
5 is attached hereto as Exhibit E.

6 11. Seoul Viosys is the lawful owner of all right, title, and interest in United
7 States Patent No. 7,982,207 entitled “Lighting Emitting Diode” (“the ’207 patent”),
8 including the right to sue and to recover for infringement thereof. The ’207 patent
9 was duly and legally issued on July 19, 2011, by the United States Patent and
10 Trademark Office to Kim et al. A copy of the ’207 patent is attached hereto as Exhibit
11 E.

12 WILLFULNESS

13 12. On July 21, 2023, Seoul Viosys sent a warning letter to Home Depot
14 regarding Seoul Viosys’s concerns that various EcoSmart white filament products
15 were infringing its patents, including EcoSmart A19605CCTCA/WFIL/ECP, one of
16 the products at issue in this litigation. Based upon Home Depot’s past history of
17 sharing warning letters with its suppliers, including Feit, Seoul Viosys is informed
18 and believes, and on that basis alleges, that Home Depot may have shared this
19 warning letter with Feit, thereby putting Feit on notice that EcoSmart white filament
20 products were infringing Seoul’s patents.

21 13. On November 8, 2023, Seoul Viosys sent a letter directly to Feit’s
22 counsel, John Mitchell, warning Feit that it was selling products that infringe Seoul
23 Viosys’s patents. Seoul Viosys gave examples of infringing products and patents,
24 including EcoSmart white filament products. Specifically, Seoul Viosys explained
25 Feit’s PAR38/RGBW/CA/AG(C) product was infringing many patents belonging to
26 Seoul Viosys and Seoul Semiconductor Co., Ltd., and that EcoSmart
27 A19605CCTCA/WFIL/ECP was infringing Seoul Viosys’s patents as well,
28 including the ’387 patent, the ’975 patent, and the ’207 patent. Seoul Viosys stated

1 that patent infringement is a very serious matter and asked Feit to confirm that it
2 would stop selling products that infringe Seoul's patents. Seoul did not receive any
3 response to this letter.

4 14. On January 23, 2024, having heard nothing in response from Feit, Seoul
5 Viosys sent a follow-up letter to Feit, reminding Feit about its infringement concerns,
6 including specifically, EcoSmart A19605CCTCA/WFIL/ECP. Seoul Viosys
7 counsel requested again that Feit stop selling products that infringe Seoul Viosys's
8 patents. Seoul Viosys did not receive any response to this letter.

9 15. On February 20, 2024, having heard nothing in response from Feit, Seoul
10 Viosys counsel sent a further follow up letter to Feit. In the letter, Seoul Viosys
11 referenced its initial warning letter from July 2023 as to Feit products being sold
12 through Home Depot and other distribution channels. Seoul Viosys also referenced
13 its other warning letters and noted that Feit had declined to provide any assurance to
14 Seoul that it would stop selling infringing products. Seoul Viosys enclosed a claim
15 chart illustrating examples of infringement by Feit of Seoul's '314 patent. Seoul
16 Viosys requested again that Feit stop selling products that infringe Seoul Viosys's
17 patents. Despite this, Seoul Viosys did not receive any response to this letter.

18 16. On May 13, 2024, Seoul Viosys sent a final letter to Feit, noting that it
19 had warned Feit many times about Seoul's patent infringement concerns. Seoul
20 Viosys also copied Kal Shah, Feit's outside litigation counsel on the letter. Seoul
21 Viosys noted that based upon its further investigation, Feit's
22 PAR38/RGBW/CA/AG(C) product was also infringing the '602 patent and that
23 Feit's EcoSmart A19605CCTCA/WFIL/ECP product was also infringing the '871
24 patent. Seoul Viosys attached exemplary claim charts showing infringement of these
25 patents by Feit products. Seoul Viosys requested yet again that Feit stop selling
26 products that infringe Seoul Viosys's patents, but has never received any response to
27 this or its prior described letters.

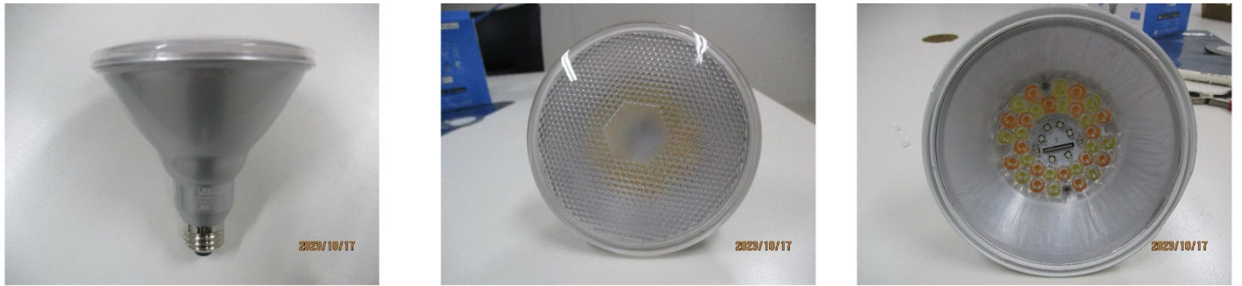
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COUNT 1

INFRINGEMENT OF U.S. PATENT NO. 11,879,602

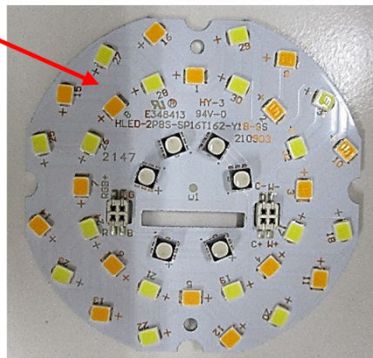
EXEMPLARY CLAIM 16

17. Feit has infringed and continues to infringe one or more claims of the '602 patent, including but not limited to exemplary claim 16, in violation of U.S.C. § 271(a), at least by without authority making, using, offering to sell and/or selling the Feit #PAR38/RGBW/CA/AG(C) within the United States.



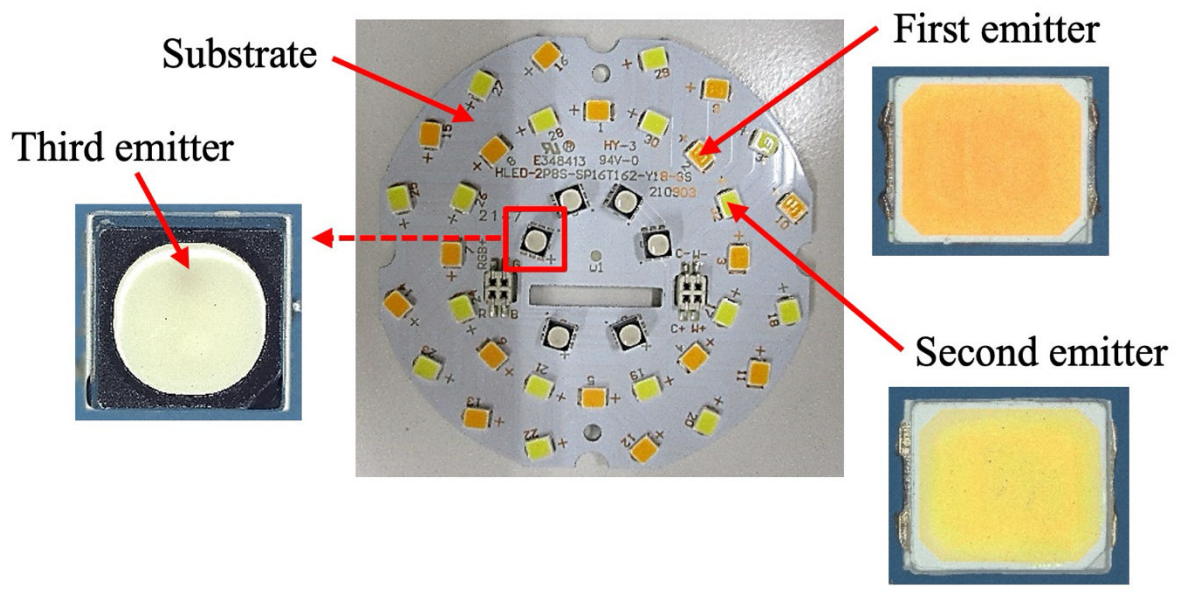
18. The Feit #PAR38/RGBW/CA/AG(C) includes a plurality of LED packages, each of which comprises an emitter, disposed on a substrate.

Substrate



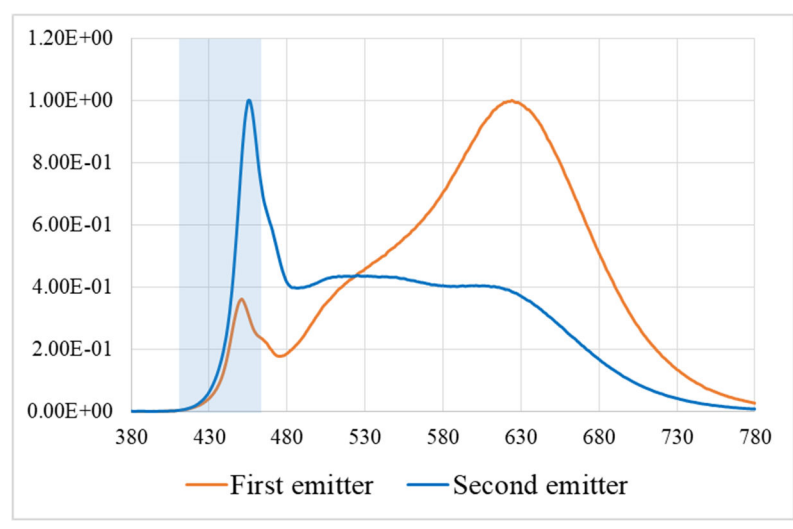
19. The Feit #PAR38/RGBW/CA/AG(C) includes at least a first emitter, second emitter, and a third emitter, each disposed on the substrate. The first emitter is configured to emit a first light including a first optical spectrum, the second emitter is configured to emit a second light including a second optical spectrum, and the third emitter is configured to emit a third light including a third optical spectrum.

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20. The third optical spectrum includes a total of one or more peaks, and a total number of peaks in the first optical spectrum is greater than the total of one or more peaks in the third optical spectrum. A peak wavelength of the second optical spectrum is different from a peak wavelength of the third optical spectrum.

21. An intensity of a peak in a range from 410 nm to 460 nm of the first optical spectrum is different from an intensity of a peak in the range from 410 nm to 460 nm of the second optical spectrum.



1 22. Feit’s infringement has caused and is continuing to cause damage and
2 irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable
3 injury unless and until that infringement is enjoined by this Court, as a remedy at law
4 alone would be inadequate.

5 23. Feit’s infringement has occurred with knowledge of the ’602 patent and
6 knowledge that its acts constitute infringement. Feit’s continuing conduct, therefore,
7 is willful.

8 24. Plaintiff is entitled to injunctive relief and damages in accordance with
9 35 U.S.C. §§ 271, 281, 283, and 284.

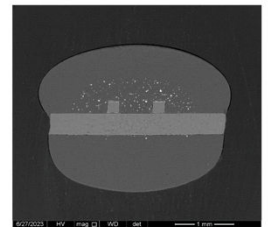
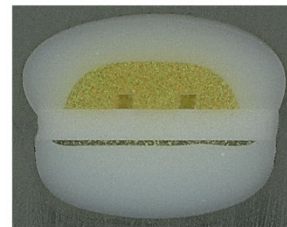
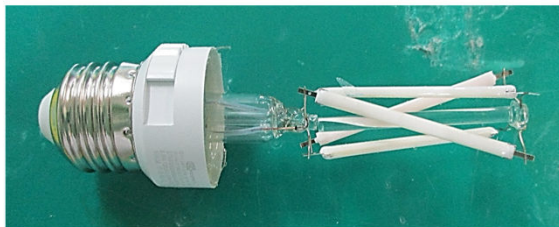
10 **COUNT 2**

11 **INFRINGEMENT OF U.S. PATENT NO. 9,837,387**

12 **EXEMPLARY CLAIM 1**

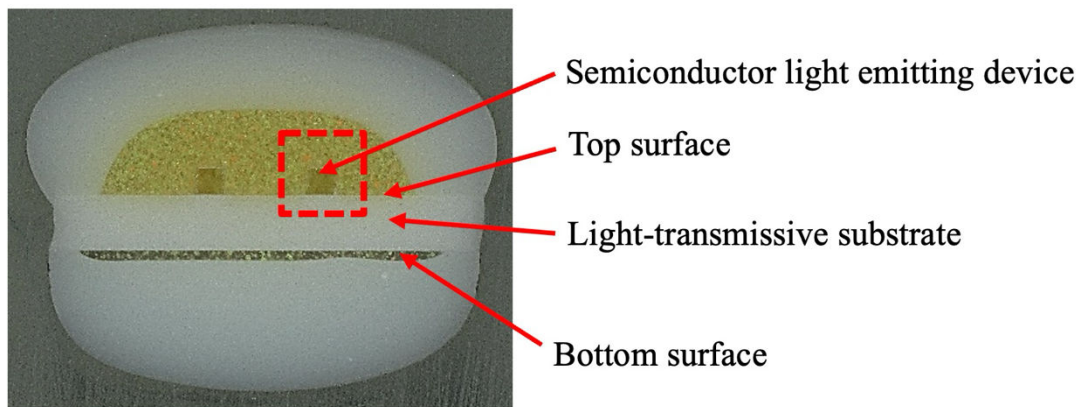
13 25. Feit has infringed and continues to infringe one or more claims of the
14 ’387 patent, including but not limited to exemplary claim 1, in violation of 35 U.S.C.
15 § 271(a), at least by without authority making, using, offering to sell and/or selling
16 the EcoSmart #A19605CCTCA/WFIL/ECP within the United States.

17 26. The EcoSmart #A19605CCTCA/WFIL/ECP includes a plurality of chip-
18 on-board type LED packages, each of which comprises a semiconductor light
19 emitting device. Optical microscope images of the LED package from the EcoSmart
20 #A19605CCTCA/WFIL/ECP are reproduced below. As shown in the image below
21 right, the LED package includes a light emitting diode (LED) chip.

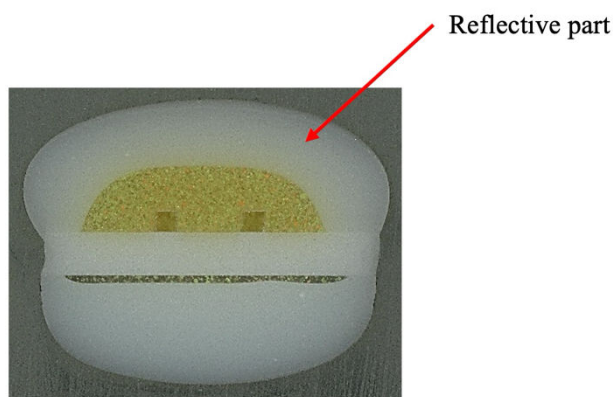


26 27. The EcoSmart #A19605CCTCA/WFIL/ECP includes a light-
27 transmissive substrate comprising a top surface and a bottom surface. It also includes
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1 a semiconductor light emitting device disposed on the top surface of the light-
2 transmissive substrate. The semiconductor light emitting device is configured to
3 emit light through the light-transmissive substrate.



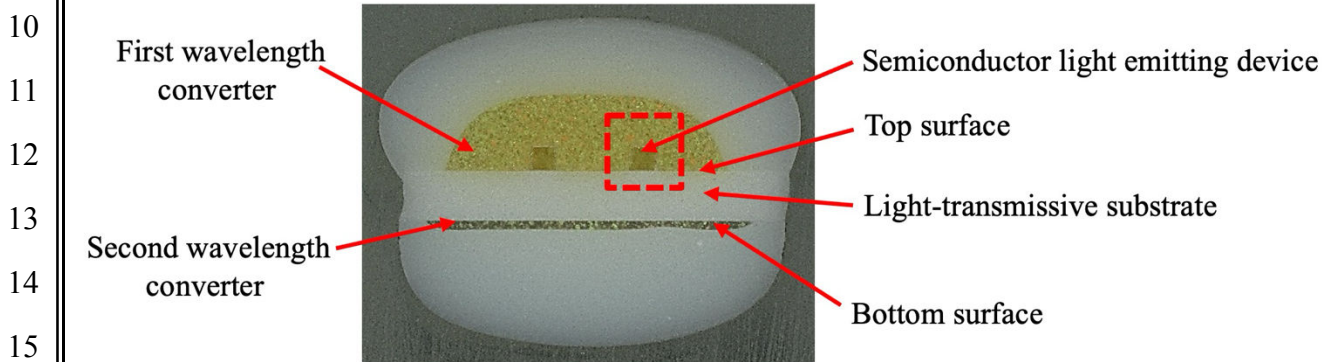
13 28. The EcoSmart #A19605CCTCA/WFIL/ECP includes a reflective part
14 disposed over the semiconductor light emitting device that is configured to reflect
15 light from the semiconductor light emitting device toward the light-transmissive
16 substrate.



25 29. The EcoSmart #A19605CCTCA/WFIL/ECP includes a first wavelength
26 converter disposed between the light-transmissive substrate and the reflective part,
27 such that a first portion of light emitted from the semiconductor light emitting device
28 and directed to the reflective part is converted by the first wavelength converter and

1 a second portion of light emitted from the semiconductor light emitting device and
2 directed to the reflective part passes through the first wavelength converter without
3 wavelength conversion.

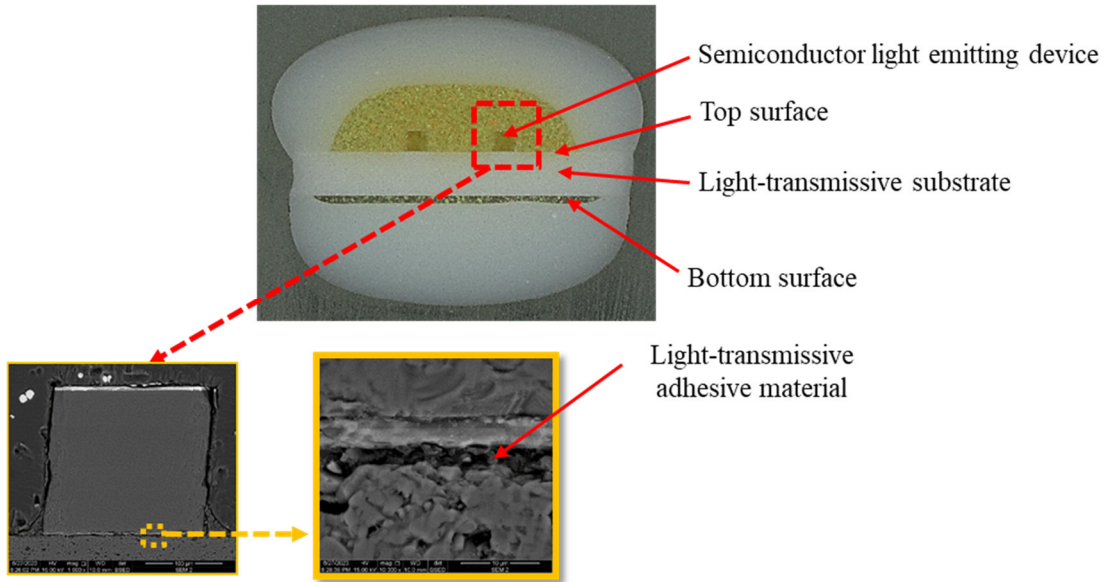
4 30. The EcoSmart #A19605CCTCA/WFIL/ECP includes a second
5 wavelength converter disposed directly on the bottom surface of the light-
6 transmissive substrate at a position corresponding to the semiconductor light
7 emitting device, such that a third portion of light emitted from the semiconductor
8 light emitting device and directed to the light-transmissive substrate is converted by
9 the second wavelength converter



17 31. The EcoSmart #A19605CCTCA/WFIL/ECP includes a light-
18 transmissive adhesive material disposed between the semiconductor light emitting
19 device and the light-transmissive substrate. The reflective part is configured to reflect
20 the first portion of light converted by the first wavelength converter and the second
21 portion of light passing through the first wavelength converter toward the light-
22 transmissive substrate.

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32. Feit’s infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

33. Feit’s infringement has occurred with knowledge of the ’387 patent and knowledge that its acts constitute infringement. Feit’s continuing conduct, therefore, is willful.

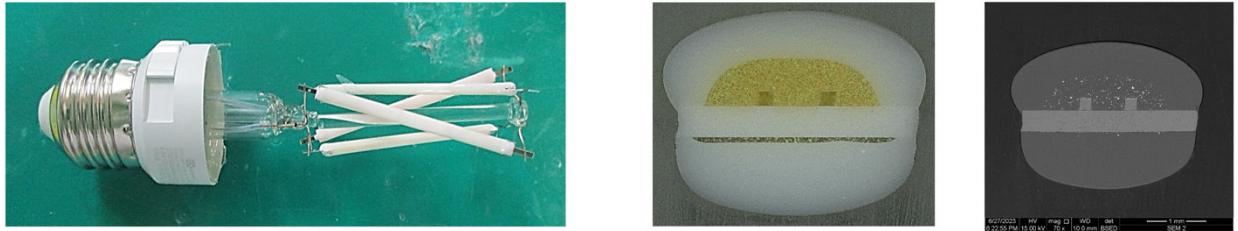
34. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

COUNT 3
INFRINGEMENT OF U.S. PATENT NO. 10,163,975
EXEMPLARY CLAIM 1

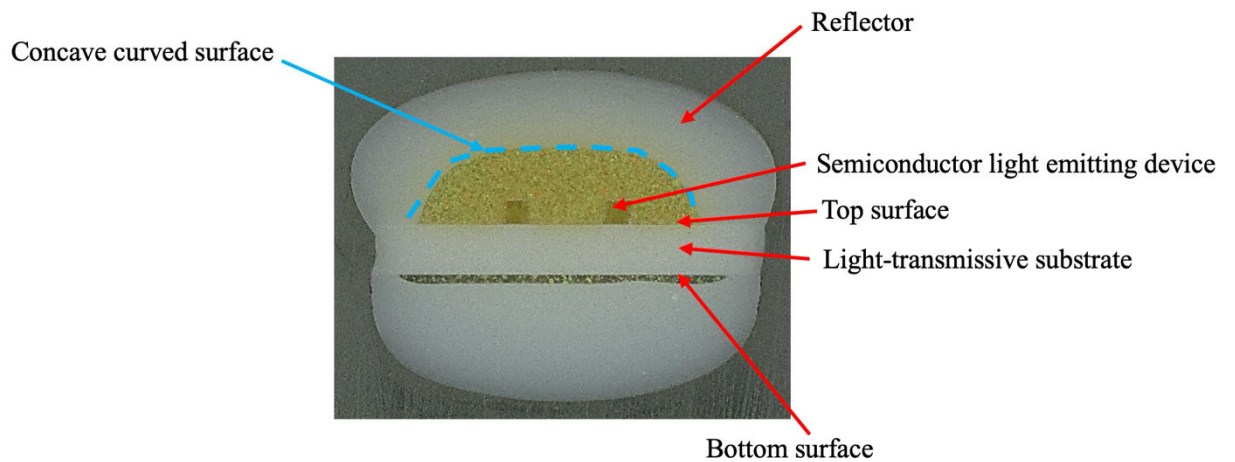
35. Feit has infringed and continues to infringe one or more claims of the ’975 patent, including but not limited to exemplary claim 1, in violation of 35 U.S.C. § 271(a), at least by without authority making, using, offering to sell and/or selling the EcoSmart #A19605CCTCA/WFIL/ECP within the United States.

36. The EcoSmart #A19605CCTCA/WFIL/ECP includes a plurality of chip-

1 on-board type LED packages, each of which comprises a semiconductor light
2 emitting device. Optical microscope images of the LED package from the EcoSmart
3 #A19605CCTCA/WFIL/ECP are reproduced below. As shown in the image below
4 right, the LED package includes a light emitting diode (LED) chip.

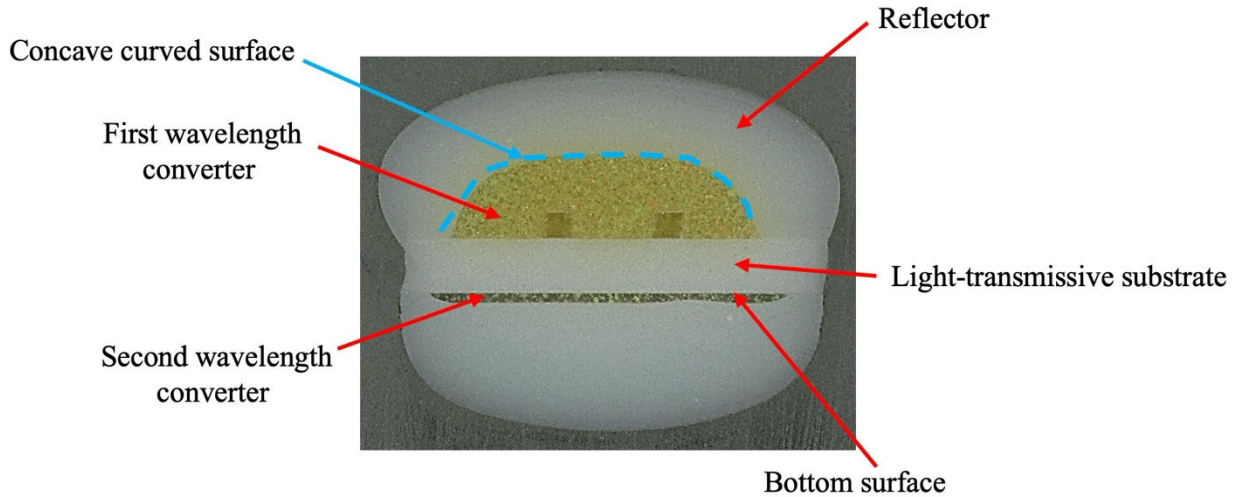


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10 37. The EcoSmart #A19605CCTCA/WFIL/ECP includes a light-
11 transmissive substrate comprising a top surface and a bottom surface. It also includes
12 at least one semiconductor light emitting device adhered with an adhesive material
13 to the top surface of the light-transmissive substrate. It further includes a reflector
14 disposed over the semiconductor light emitting device and comprising a concave
15 curved surface.

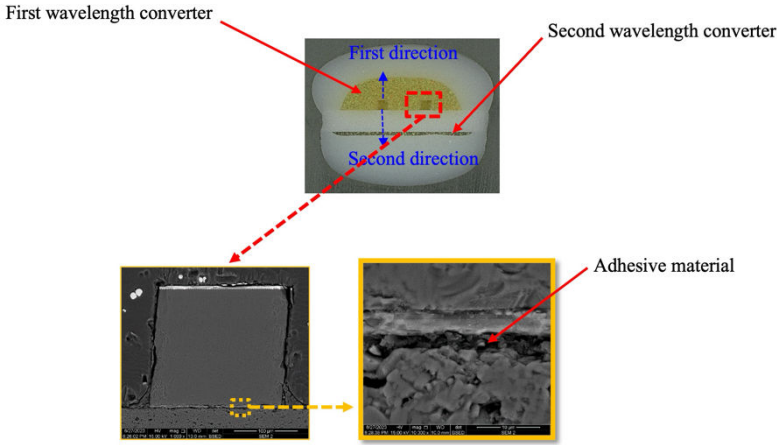


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25 38. The EcoSmart #A19605CCTCA/WFIL/ECP includes a first wavelength
26 converter disposed on the concave curved surface between the light-transmissive
27 substrate and the reflector. It also includes a second wavelength converter disposed
28 directly on the bottom surface of the light-transmissive substrate.

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39. In the EcoSmart #A19605CCTCA/WFIL/ECP, the first wavelength converter converts a wavelength of light emitted in a first direction from the semiconductor light emitting device to the first wavelength converter and the second wavelength converter converts a wavelength of light emitted in a second direction from the semiconductor light emitting device to the second wavelength converter through the adhesive material and the light-transmissive substrate.



40. Feit’s infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

41. Feit’s infringement has occurred with knowledge of the ’975 patent and

1 knowledge that its acts constitute infringement. Feit’s continuing conduct, therefore,
2 is willful.

3 42. Plaintiff is entitled to injunctive relief and damages in accordance with
4 35 U.S.C. §§ 271, 281, 283, and 284.

5 **COUNT 4**

6 **INFRINGEMENT OF U.S. PATENT NO. 9,269,871**

7 **EXEMPLARY CLAIM 1**

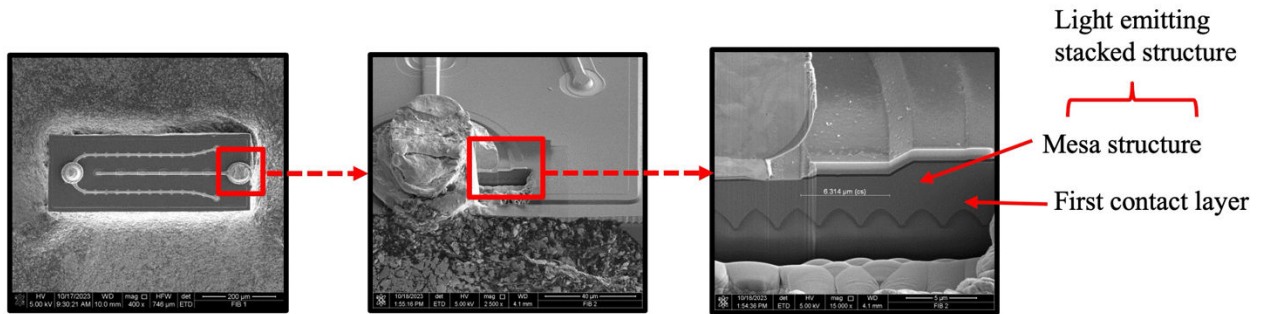
8 43. Feit has infringed and continues to infringe one or more claims of the
9 ’871 patent, including but not limited to exemplary claim 7, in violation of 35 U.S.C.
10 § 271(a), at least by without authority making, using, offering to sell and/or selling
11 the EcoSmart #A19605CCTCA/WFIL/ECP within the United States.

12 44. The EcoSmart #A19605CCTCA/WFIL/ECP includes a plurality of chip-
13 on-board type LED packages, each of which comprises a light emitting diode.
14 Optical microscope images of the LED package from the EcoSmart
15 #A19605CCTCA/WFIL/ECP are reproduced below before and after removal of an
16 encapsulant. As shown in the image below right, the LED package includes a light
17 emitting diode (LED) chip.

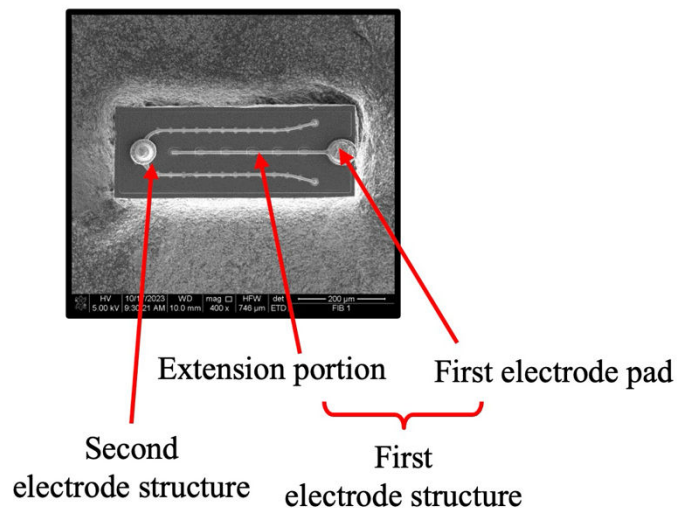


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23 45. Below are three Scanning Electron Microscope (SEM) images of an LED
24 chip from the EcoSmart #A19605CCTCA/WFIL/ECP. The left image shows the top
25 image of the LED chip. The center image shows the area surrounding the electrode
26 pad. The dark space near the electrode pad in the bottom image indicates a hole
27 created using a FIB. The right composite image shows the cross-section of the hole.
28 Focusing in on the central part of the image, the cross-section shows a light emitting

1 stacked structure comprising a first contact layer and a mesa structure positioned
 2 over at least a portion of the first contact layer.



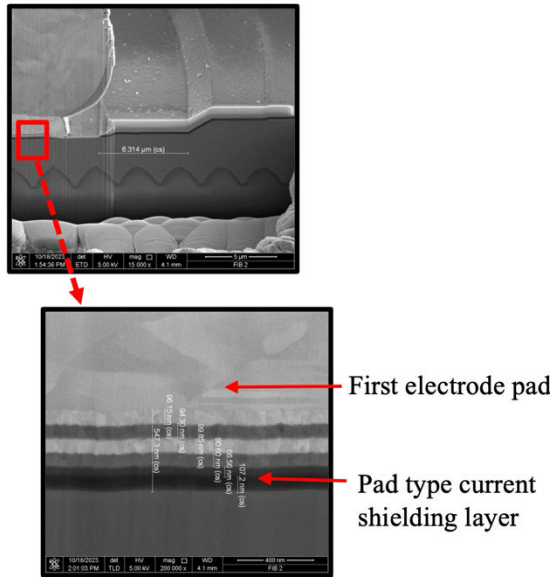
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 10 46. The EcoSmart #A19605CCTCA/WFIL/ECP includes a first electrode
 11 structure positioned over the first contact layer and including a first electrode pad
 12 and an extension portion extending from the first electrode pad; and a second
 13 electrode structure positioned over the mesa structure.



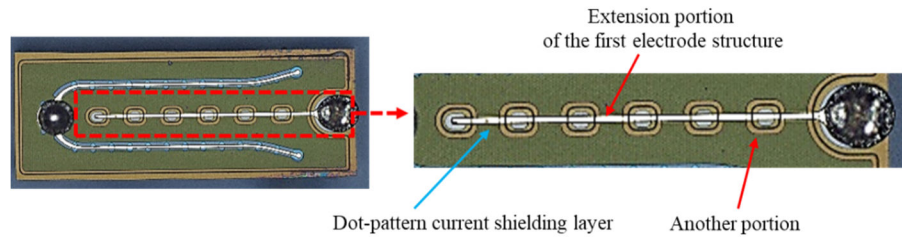
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 24 47. The first electrode structure in the EcoSmart
 25 #A19605CCTCA/WFIL/ECP comprises a pad type current shielding layer formed
 26 under the first electrode pad.

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48. The first electrode structure in the EcoSmart #A19605CCTCA/WFIL/ECP comprises a dot-pattern current shielding layer formed under the extension portion of the first electrode structure, and the extension portion includes another portion that is in contact with the first contact layer.



49. Feit’s infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

50. Feit’s infringement has occurred with knowledge of the ’871 patent and knowledge that its acts constitute infringement. Feit’s continuing conduct, therefore, is willful.

51. Plaintiff is entitled to injunctive relief and damages in accordance with

1 35 U.S.C. §§ 271, 281, 283, and 284.

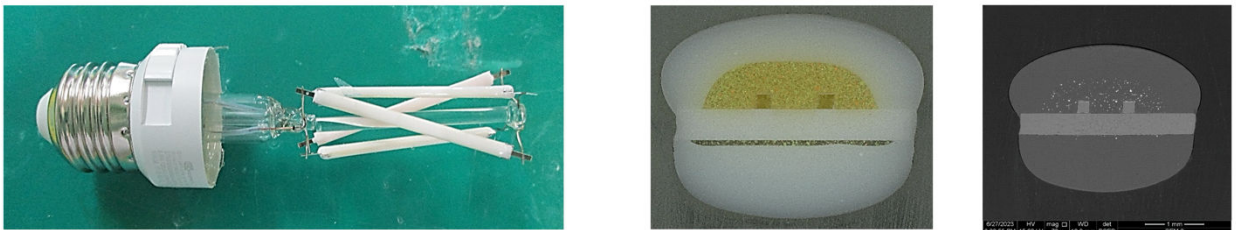
2 **COUNT 5**

3 **INFRINGEMENT OF U.S. PATENT NO. 9,929,314**

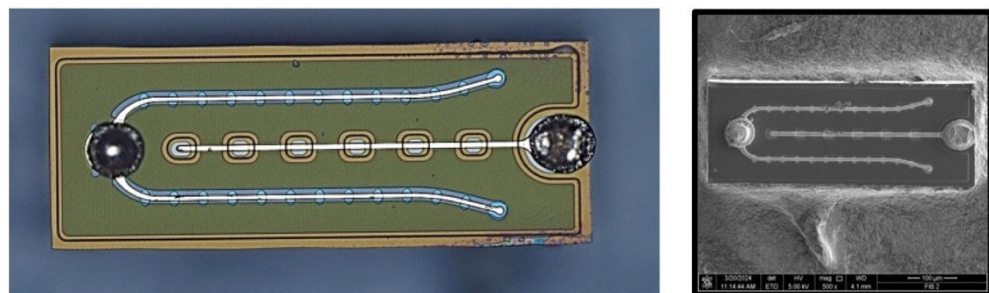
4 **EXEMPLARY CLAIM 1**

5 52. Feit has infringed and continues to infringe one or more claims of the
6 '314 patent, including but not limited to exemplary claim 1, in violation of 35 U.S.C.
7 § 271(a), at least by without authority making, using, offering to sell and/or selling
8 the EcoSmart #A19605CCTCA/WFIL/ECP within the United States.

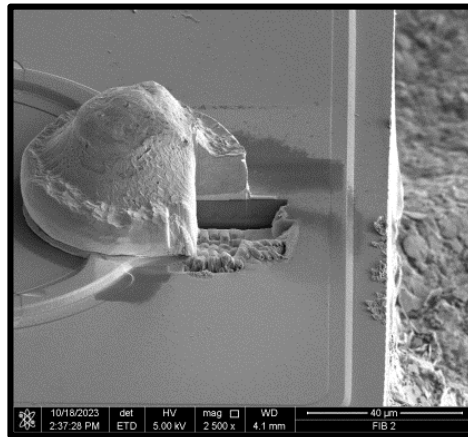
9 53. The EcoSmart #A19605CCTCA/WFIL/ECP includes a plurality of LED
10 packages, each of which includes light emitting diode devices. Optical microscope
11 images of an LED package from the EcoSmart #A19605CCTCA/WFIL/ECP are
12 reproduced below before and after removal of an encapsulant. As shown in the image
13 below right, the LED package includes two light emitting diode devices.



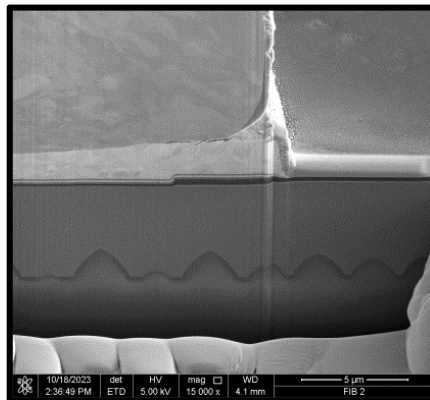
20 54. Optical and SEM images of an LED device from the EcoSmart
21 #A19605CCTCA/WFIL/ECP are reproduced below.



1 55. Below is an SEM image of the device after a hole was milled using a FIB.
2 The hole was milled adjacent to a p-type contact on the upper surface of the device.



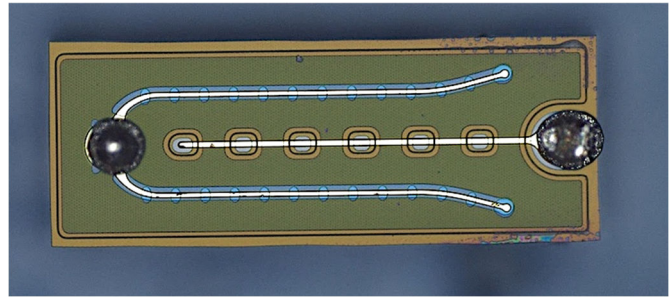
11 56. Below is a composite image of the inner surface of the milled hole
12 showing the layer structure of the device, which includes from bottom to top: a
13 patterned substrate and a light emitting structure disposed over the substrate. The
14 light emitting structure includes from bottom to top, a first (n-type) semiconductor
15 layer, an active layer, and a second (p-type) semiconductor layer.



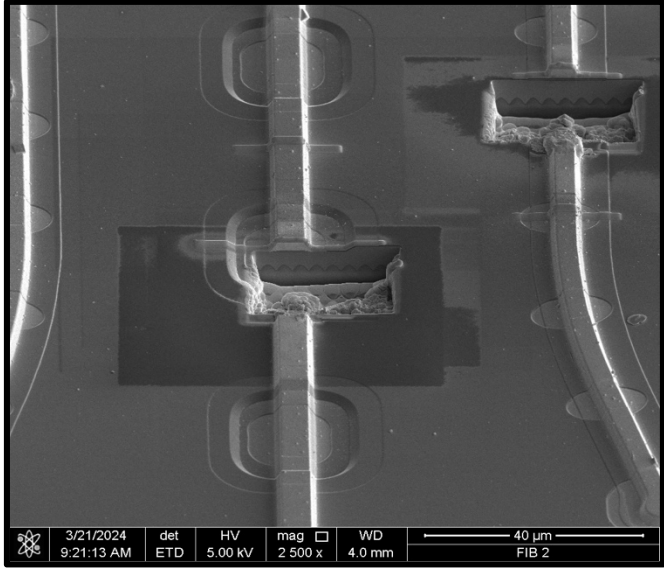
24 57. Returning to the optical microscope image from above (reproduced again
25 below for convenience), the first electrode pad, which is disposed over the first (n-
26 type) semiconductor layer is shown on the right. A first extension is shown extending
27 from the first electrode pad.

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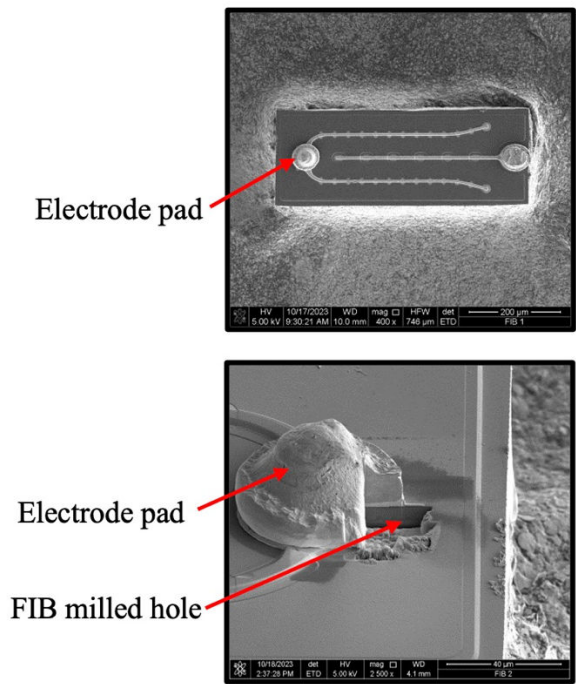
58. The image below shows a hole milled into the first extension using a FIB. The hole is milled through the middle of a set of three faint ovals visible in the image below. The ovals also appear as bright slightly wider regions around the first extension in the optical microscope image above. The ovals indicate regions within which the first extension includes first portions that are in contact with the underlying first (n-type) semiconductor layers. The areas outside of ovals indicate second portions that are not in contact with the first (n-type) semiconductor layer. Those regions can also be seen in the optical microscope image above as relatively narrow portions of the first extension between the ovals described above. As the images also show, the first portions and one of the second portions are alternately disposed along the first extension.



1 on-board type LED packages, each of which comprises a light emitting diode.
2 Optical microscope images of the LED package from the EcoSmart
3 #A19605CCTCA/WFIL/ECP are reproduced below before and after removal of an
4 encapsulant. As shown in the image below right, the LED package includes a light
5 emitting diode (LED) chip.

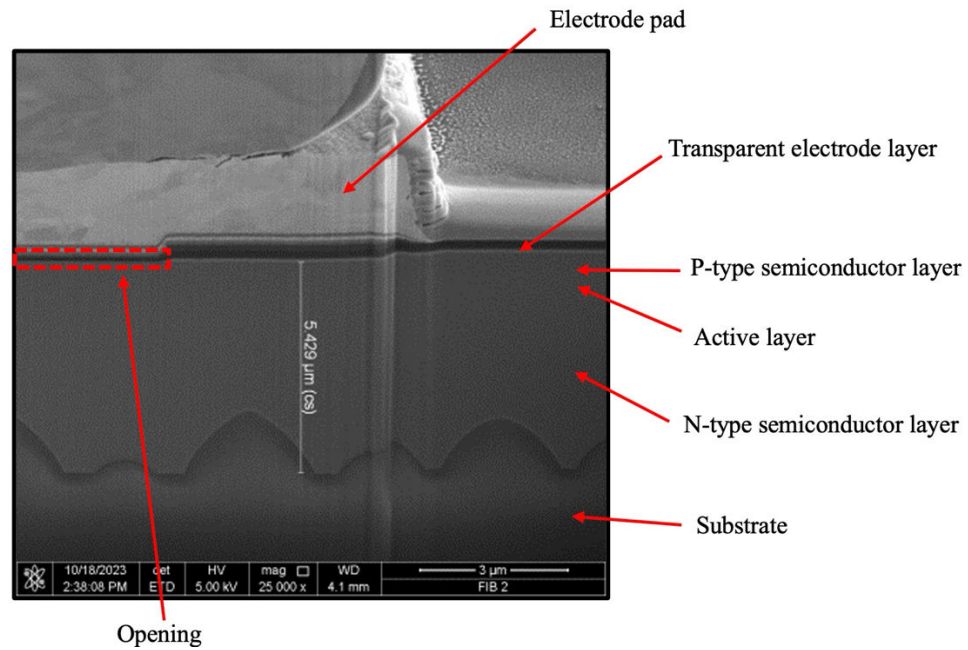


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10 65. Below are two Scanning Electron Microscope (SEM) images of an LED
11 chip from the EcoSmart #A19605CCTCA/WFIL/ECP. The top image shows the top
12 image of the LED chip, with an electrode pad labeled. The second image shows the
13 area surrounding the electrode pad. The dark space near the electrode pad in the
14 bottom image indicates a hole created using a FIB.

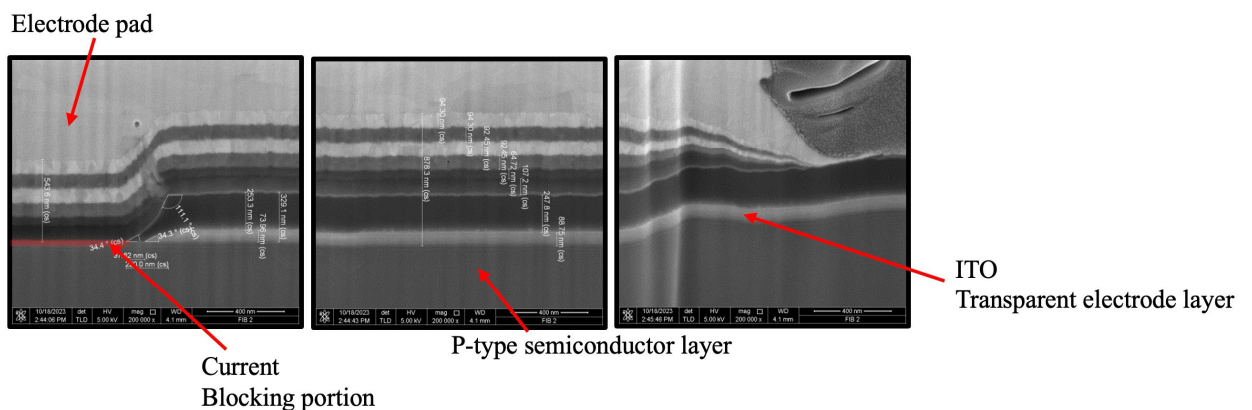


27 66. The below composite image shows the cross-section of the hole.
28 Focusing in on the central part of the image, the cross-section shows from bottom to

1 top (in relevant part) a substrate, an n-type semiconductor layer, an active layer, a p-
 2 type semiconductor layer, an active and a transparent electrode (ITO) layer.

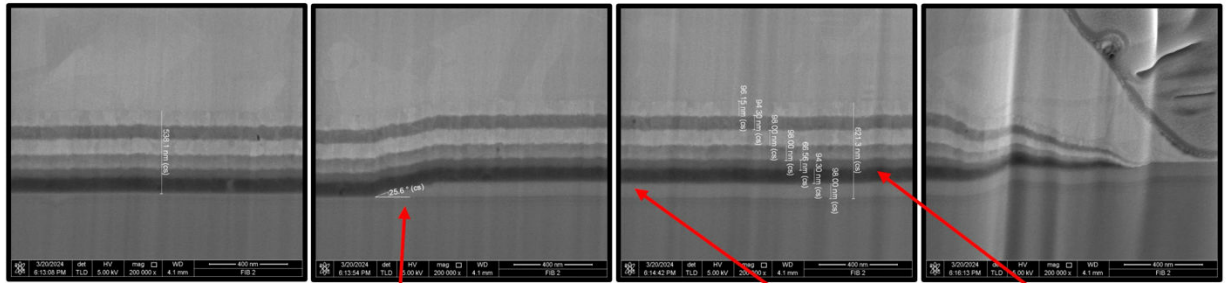


13 67. The image below is an enlarged SEM of the above-described FIB-milled
 14 hole. The transparent electrode layer comprises an opening exposing the p-type
 15 semiconductor layer, and there is a current blocking portion arranged in the opening.
 16 There is also an electrode pad arranged on the current blocking portion. The electrode
 17 pad extends into the opening as shown.



26 68. The below composite image shows the cross-section of an area outside
 27 of the opening. As shown below, the aluminum layer, which comprises a part of the
 28 electrode pad, contacts the upper surface of the ITO transparent electrode layer

1 outside of the opening.



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6 P-type semiconductor layer ITO Transparent electrode layer Aluminum layer

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9 69. Feit’s infringement has caused and is continuing to cause damage and
10 irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable
11 injury unless and until that infringement is enjoined by this Court, as a remedy at law
12 alone would be inadequate.

13 70. Feit’s infringement has occurred with knowledge of the ’207 patent and
14 knowledge that its acts constitute infringement. Feit’s continuing conduct, therefore,
15 is willful.

16 71. Plaintiff is entitled to injunctive relief and damages in accordance with
17 35 U.S.C. §§ 271, 281, 283, and 284.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiff requests that the Court enter judgment in its favor
20 and against Defendant Feit, as follows:

21 A. A judgment that Defendant infringes the ’602, ’387, ’975, ’871, ’314, and
22 ’207 patents;

23 B. A preliminary and permanent injunction restraining and enjoining
24 Defendant, its officers, partners, agents, servants, employees, parents, subsidiaries,
25 divisions, affiliate corporations, joint ventures, other related business entities and all
26 other persons acting in concert, participation, or in privity with them, and their
27 successors and assigns, from infringing the ’602, ’387, ’975, ’871, ’314 and ’207
28 patents;

1 C. An award of damages to Plaintiff arising from Defendant’s past and
2 continuing infringement up until the date Defendant is finally and permanently
3 enjoined from further infringement, including compensatory damages;

4 D. A determination that Defendant’s infringement of one or more of ’602,
5 ’387, ’975, ’871, ’314 and ’207 patents was willful, and a trebling of damages
6 pursuant to 35 U.S.C. § 284;

7 E. A determination that this is an exceptional case and awarding Plaintiff’s
8 attorneys’ fees pursuant to 35 U.S.C. § 285;

9 F. An order awarding Plaintiff the costs and expenses that it has incurred in
10 prosecuting this action;

11 G. An order awarding Plaintiff pre- and post-judgment interest on its
12 damages; and

13 H. Such other and further relief in law or in equity as this Court deems just
14 and proper.

15 **JURY DEMAND**

16 Plaintiff Seoul Viosys respectfully requests a jury trial on all issues so triable.

17 DATED: May 21, 2024

Respectfully submitted,

18 /s/ Guy Ruttenberg
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CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Guy Ruttenberg