

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS**

**CASE NO.: 4:24-cv-00668**

VOLTSTAR TECHNOLOGIES, INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendant.

**NATURE OF THE LAWSUIT**

1. This is an action for patent infringement of U.S. Patent No. 7,910,833, U.S. Patent No. 7,960,648 and U.S. Patent No. 9,024,581, and its Reissue Patent No. RE48,794 E arising under 35 U.S.C. §§ 1 *et seq.* to enjoin further infringement and obtain damages resulting from Defendant's unauthorized manufacture, use, offer to sell and sale in the United States of products identified and described herein. Defendant violated Plaintiff's rights under U.S. Patent No. 7,910,833, U.S. Patent No. 7,960,648, and U.S. Patent Number 9,024,581 and its Reissue Patent No. RE48,794 E. Plaintiff seeks permanent injunctive relief and monetary damages resulting from Defendant's infringement.

**JURISDICTION AND VENUE**

2. This Court has original and exclusive subject matter jurisdiction pursuant to 28 U.S.C. § 1331; 28 U.S.C. § 1338(a); and 35 U.S.C. § 271.

3. This Court has personal jurisdiction over the Defendant.

**SRIPLAW**

CALIFORNIA ♦ GEORGIA ♦ FLORIDA ♦ TENNESSEE ♦ NEW YORK ♦ INDIANA

4. Venue is proper in this district pursuant to 28 U.S.C. § 1400(b) because Defendant has committed acts of infringement and has a regular and established place of business within this judicial district and division.

**THE PLAINTIFF**

5. Plaintiff, Voltstar Technologies, Inc. (“Voltstar”), is an Illinois corporation with a principal place of business located in Barrington, IL 60010.

**THE DEFENDANT**

6. Samsung Electronics America, Inc. (“Samsung”) is a New York corporation registered to do business in the State of Texas, with its principal place of business at 105 Challenger Road, Ridgefield Park, New Jersey 07660. Samsung maintains offices and facilities at 6625 Excellence Way, Plano, Texas 75023. Samsung can be served with process by serving its registered agent C T Corporation System at 1999 Bryan St., Ste. 900, Dallas, TX 75201.

**THE PATENTS-IN-SUIT**

**THE '794 PATENT**

7. Voltstar owns all rights, titles, and interests in, and/or has standing to sue for infringement of U.S. Patent No. RE48,794 E (the “’794 Patent”), entitled “Charger Plug With Improved Package”, issued October 26, 2021. A copy of the ’794 Patent is attached hereto as **Exhibit 1**.

8. Prior to May 21, 2008, James W. McGinley, Donald Rimdzius, and David P. Marcusen, invented a novel and non-obvious Charger Plug with Improved Package.

9. McGinley, Rimdzius, and Marcusen applied for and obtained U.S. Patent No. 9,024,581 (the “’581 Patent”) entitled “Charger Plug with Improved Package Electrical Charger” which was duly and legally issued on May 5, 2015.

10. These inventors assigned all rights, titles, and interests in and to the '581 Patent to Horizon Technologies, Inc. in May 2008, which was recorded at the United States Patent and Trademark Office on May 21, 2008, at Reel 20979, Frame 56. Horizon Technologies, Inc. changed its name to Voltstar Technologies, Inc. and recorded such name change at the United States Patent and Trademark Office on March 1, 2010, and corrected on November 22, 2010, at Reel 25411, Frame 783.

11. In general, non-legal terms, the '581 Patent relates to a Charger that is to be connected between a source of AC power, such as a wall outlet, and a device, such as a mobile phone, that includes a battery with the battery being rechargeable through the use of DC power. The size and shape of the Charger are such that upon plugging the Charger into a source of AC power, such as a wall outlet, the Charger (a) does not block or interfere with the use of adjacent outlets and (b) does not interfere with objects or furniture that may be placed adjacent to or in front of the outlet. In addition, the size and shape of the Charger are such that (a) a power cord for the device to be charged may be easily inserted into and removed from the Charger while the Charger is plugged into the source of AC power and (b) removal of the power cord from the Charger can be accomplished without removal of the Charger from the source of AC power. An example of the '581 Patent is shown below:



12. On October 26, 2021, '581 Patent was reissued as '794 Patent. This reissued patent, in part, specifically amended Claim 1(i) to now state: “being sized so that the charger plug housing comprises a longitudinal length extending between the front wall and the rear end and the longitudinal length is less than 2.0 inches, a width of the housing outer profile being less than 1.75 inches ...”<sup>1</sup>

13. Pursuant to 35 U.S.C. § 252, Claim 1 of the reissued '794 Patent is substantially identical to the '581 Patent because the claim has only limited the sizing dimensions of the claimed invention. Therefore, the '794 Patent is a continuation of the '581 Patent, effective from May 5, 2015.

### THE '833 PATENT

14. Voltstar owns all rights, titles, and interests in, and/or has standing to sue for infringement of U.S. Patent No. 7,910,833 (the “'833 Patent”), entitled “Energy-Saving Power

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<sup>1</sup> The previous language of the U.S. Patent No. 9,024,581 Claim 1(i) stated: “being sized so that the charger plug housing comprises a longitudinal length extending between the front wall and the rear end and the longitudinal length is equal to or less than 2.0 inches ...”

On reissue, the USPTO amended the claim language. The bolded language was omitted and the italicized portion was included, shown as follows: “being sized so that the charger plug housing comprises a longitudinal length extending between the front wall and the rear end and the longitudinal length is [equal to or] less than 2.0 inches, *a width of the housing outer profile being less than 1.75 inches ...*”

Adapter/Charger”, issued March 22, 2011. A copy of the ’833 Patent is attached hereto as

**Exhibit 2.**

15. Before May 27, 2008, Valerie L McGinley, Donald Rimdzius, and James McGinley invented a novel and non-obvious Energy Saving Power Adapter/Charger.

16. The inventors assigned all right, title and interest in and to the ’833 Patent to Horizon Technologies, Inc.

17. In general, non-legal terms, the ’833 Patent relates to a charger that automatically shuts off when a device is fully charged or not plugged in, reducing “phantom load”—residual power consumption by power devices when not connected to their host electronic device, or when the electronic device is shut off. This feature reduces power consumption and extends battery life.

**THE ’648 PATENT**

18. Voltstar owns all rights, titles, and interests in, and/or has standing to sue for infringement of U.S. Patent No. 7,960,648 (the “’648 Patent”), entitled “Energy-Saving Cable Assemblies”, issued June 14, 2011. A copy of the ’648 Patent is attached hereto as **Exhibit 3**. The ’648 Patent is a continuation of and claims priority to the ’833 Patent mentioned above.

19. Prior to October 15, 2008, James W. McGinley, Donald Rimdzius, Valerie McGinley, and Dominic James Hogan invented a novel and non-obvious Energy Saving Cable Assemblies.

20. These inventors assigned all rights, titles and interests in and to the ’648 Patent to Horizon Technologies, Inc.

21. In general, non-legal terms, the ’648 Patent, as a continuation of the ’833 Patent, also relates to a charger, used in conjunction with a mobile electronic device, that automatically

shuts off when a device is fully charged or not plugged in, reducing “phantom” load. This feature reduces power consumption and extends battery life.

### **DEFENDANT’S PRODUCTS**

#### **Accused Product #1 – 25 W Super Fast Wall Charger**

22. Samsung makes, uses, offers for sale and sells 25 W Super Fast Wall Charger (hereinafter referred to as “Super Fast Wall Charger”). Examples of the Super Fast Wall Charger distributed by Samsung are shown below.



23. Samsung advertises the use of and sells its Super Fast Wall Charger which is a *charger* that is to be connected between a source of AC power, such as a wall outlet, and a device such as a mobile phone that includes a battery with the battery being rechargeable through the use of DC power.

24. In particular, the Super Fast Wall Charger distributed by Samsung employ a reduced plug-size charger plug, that upon plugging the Power Adapter into a source of AC power such as a wall outlet, the Super Fast Wall Charger does not block or interfere with the use of adjacent outlets.

25. Moreover, the size and shape of the Super Fast Wall Charger are such that a power cord for the device to be charged may be easily inserted into and removed from the Super Fast Wall Charger while the charger is plugged into the source of AC power and removal of the power cord from the Super Fast Wall Charger can be accomplished without removal of the charger from the source of AC power.

26. Attached hereto as **Exhibit 4** is a Claim Chart that illustrates each element of the infringing Super Fast Wall Charger as compared to Claim 1 in the '794 Patent.

27. Samsung infringed at least one of the claims of the '794 Patent by offering to sell and by selling a charger plug identified as Super Fast Wall Charger.

28. The Super Fast Wall Charger has a longitudinal length less than 2 inches, approximately 1.996 inches, and a width of less than 1.75 inches, approximately 1.626 inches.

**Accused Product #2 – Super Fast Wireless Charger**

29. Samsung makes, uses, offers for sale and sells Super Fast Wireless Charger (hereinafter, "Samsung Wireless Charger"). Examples of the Samsung Wireless Charger distributed by Samsung are shown below.



30. Defendant advertises and sells its Samsung Wireless Charger which is a Qi-compliant *wireless charger* that is to be connected between a source of AC power, such as a wall outlet, and a device such as a mobile phone that includes a rechargeable battery.

31. Qi (pronounced “chee”) is one of the global wireless charging standards for providing 5-15 watts of power to small personal electronics. Though it is primarily used to charge smartphones, the standard can also apply and easily be used to provide power for a growing number of consumer devices.

32. Qi is an open standard, and Qi-enabled mobile electronic devices are able to connect to Qi-certified (or Qi-compliant) chargers from any manufacturer.

33. Devices that operate using the Qi standard rely on electromagnetic induction between coils. A Qi system consists of two devices – the transmitting device (the charger), which is connected to a power source and provides inductive power, and the mobile device (to be charged), which consumes inductive power. The transmitting device comprises a transmitting



coil that generates an oscillating magnetic field; the mobile device contains a power receiving coil. The magnetic field induces an alternating current in the receiving coil of the mobile device, by Faraday's law of induction, thereby charging the battery of the mobile device.

34. In order for a wireless charger to function optimally and efficiently, the wireless charging device must have internal monitoring circuitry to detect when a mobile electronic device requires charging or is fully charged. The internal circuitry further comprises one or more internal switches (mechanical or electrical) that control the flow of current based on the charge-status of the battery of the mobile electronic device. Furthermore, the internal circuitry of the wireless charger requires a novel load sensing portion, which senses the frequency of pulses rather than sensing the magnitude of a voltage and/or current, to determine the load being drawn, and to determine an "off" state for the device.

35. In particular, the Samsung Wireless Charger utilizes the internal monitoring and switch circuitry features, and all elements of the charging device, as claimed by one or more claims, including but not necessarily limited too, Claims 24 and 33 of the '833 Patent and Claims 31, 32 and 39 in the '648 Patent.

36. Attached hereto as **Exhibit 5** is a Claim Chart that illustrates each element of the infringing Samsung Wireless Charger as compared to Claims 24, 33 and in the '833 Patent, and Claims 31, 32 and 39 in the '648 Patent.

37. Defendant infringed at least one of the claims of the '833 and the '648 Patents by offering to sell and by selling a wireless charger identified as Samsung Wireless Charger.

**COUNT I**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. RE48,794 E**

38. Voltstar repeats, realleges, and incorporates by reference, as if fully set forth herein paragraphs 1 through 37, as set forth above.

39. Within the six years preceding the filing of this Complaint, Defendant has directly infringed at least one claim of the '794 Patent by making, using, selling, offering for sale in the United States, and/or importing into the United States its Super Fast Wall Charger, in violation of 35 U.S.C. § 271(a).

40. Without limiting the foregoing, Defendant has infringed at least Claim 1 of the '794 Patent as described in the Claim Chart attached hereto as **Exhibit 4**.

41. Defendant's acts of making, using, selling, offering for sale in the United States, and/or importing into the United States infringing products have been without license, permission, or authorization from Voltstar.

42. Defendant's infringement of the '794 Patent has injured and continues to injure Voltstar in an amount to be proven at trial, but not less than a reasonable royalty.

**COUNT II**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 7,910,833**

43. Voltstar repeats, realleges, and incorporates by reference, as if fully set forth herein paragraphs 1-37, as set forth above.

44. Within the six years preceding the filing of this Complaint, Defendant has directly infringed at least one claim of '833 Patent by making, using, selling, offering for sale in the United States, and/or importing into the United States its Samsung Wireless Charger, in violation of 35 U.S.C. § 271(a).

45. Without limiting the foregoing, Defendant has infringed at least Claim 24, 33 and 36 of the '833 Patent as described in the Claim Chart attached hereto as **Exhibit 5**.

46. Defendant's activities referred to in this Count have been without license, permission, or authorization from Voltstar.

47. Defendant's infringement of the '833 Patent has injured and continues to injure Voltstar in an amount to be proven at trial, but not less than a reasonable royalty.

**COUNT III**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 7,960,648**

48. Voltstar repeats, realleges, and incorporates by reference, as if fully set forth herein paragraphs 1-37, as set forth above.

49. Within the six years preceding the filing of this Complaint, Defendant has directly infringed at least one claim of '648 Patent by making, using, selling, offering for sale in the United States, and/or importing into the United States its Samsung Wireless Charger, in violation of 35 U.S.C. § 271(a).

50. Without limiting the foregoing, Defendant has infringed at least Claim 31, 32 and 39 of the '648 Patent as described in the Claim Chart attached hereto as **Exhibit 5**.

51. Defendant's activities referred to in this Count have been without license, permission, or authorization from Voltstar.

52. Defendant's infringement of the '648 Patent has injured and continues to injure Voltstar in an amount to be proven at trial, but not less than a reasonable royalty.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Voltstar Technologies, Inc. demands judgment and relief against Defendant Samsung Electronics America, Inc. and respectfully requests that the Court:

- A. An entry of judgment holding that Defendant has infringed and is infringing the patents-in suit;
- B. For an accounting and an award of damages sufficient to compensate Voltstar for the infringement in no event less than a reasonable royalty pursuant to 35 U.S.C. § 284;

- C. A determination that Defendant's infringement has been willful, wanton, and deliberate and that the damages against it be increased up to treble on this basis or for any other basis in accordance with the law;
- D. A finding that this case is an exceptional case under 35 U.S.C. § 284 and an award to Voltstar of its costs and reasonable attorneys' fees as provided by 35 U.S.C. § 285;
- E. An accounting of all infringing sales and revenues, together with post judgment interest and prejudgment interest from the first date of infringement of the '794 Patent; and
- F. That Voltstar is entitled to such other and further relief as to the Court appears just and proper.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury of all issues so triable.

DATED: July 23, 2024

Respectfully submitted,

*/s/ Joel B. Rothman*

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