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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

<p>WILSON ELECTRONICS, LLC, a Delaware Limited Liability Company,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>SHAOPENG YE dba OBDATOR, an unknown Chinese entity,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No: 24-cv-73</p> <p>COMPLAINT FOR PATENT INFRINGEMENT</p> <p>Judge</p> <p>DEMAND FOR JURY TRIAL</p>
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Plaintiff Wilson Electronics, LLC (“Wilson” or “Plaintiff”) complains and alleges as follows against Defendant Shaopeng Ye dba obdator (“obdator” or “Defendant”).

NATURE OF THE CLAIMS

1. This is an action for patent infringement under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.*
2. Wilson is the owner of U.S. Patent Number 8,755,399 (the “399 Patent” or the “Asserted Patent”), which is attached as Exhibit A.

3. The Asserted Patent claims inventions directed to devices commonly known as “cell phone boosters” or “cell phone signal boosters.” Specifically, the Asserted Patent claims an architecture for such devices that allows for the efficient processing of signals in such a device.

4. Defendant sells a product on Amazon’s U.S. marketplace that Defendant calls the “Verizon Cell Phone Signal Booster AT&T T Mobile Sprint US Cellular ATT Cell Phone Booster for All US Carriers Boost Voice/Data for 5G 4G LTE 3G 2G AT&T Signal Booster Verizon Cell Booster for Home” (the “Accused Product”). The Accused Product practices the inventions of the Asserted Patents, including its patented cell phone booster architecture, and is depicted below:



<https://www.amazon.com/Booster-Verizon-Straight-Cricket-Amplifier/dp/B08TWK29NK/>

5. The Accused Product practices the inventions of the Asserted Patent as detailed in the patent claim chart attached as Exhibit B.

THE PARTIES

6. Plaintiff Wilson Electronics, LLC is a Delaware limited liability company with a principal place of business at 3284 Deseret Dr, St. George, UT 84790.

7. Defendant Shaopeng Ye dba obdator (“obdator”) is an unknown Chinese entity doing business through Amazon’s U.S. marketplace website. Obdator provided Amazon with the following Chinese address for its business operations:

观澜街道大富工业区
鹏龙蟠科技园 F 栋 620室
深圳
龙华区
广东
518000
CN

JURISDICTION

8. This matter arises under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* This Court has federal question subject matter jurisdiction under 28 U.S.C. § 1331.

9. This Court has personal jurisdiction over Defendant obdator pursuant to Federal Rule of Civil Procedure 4(k)(2) (the “federal long-arm statute.”). Defendant obdator is located in China and does business in the United States. The Defendant has committed acts of patent infringement targeted at the United States, and has placed infringing products into the stream of commerce with the knowledge or understanding that such products are targeted at the United States. Such acts include shipping products to Amazon in the United States for sale to United States residents, targeting United States residents through its advertising on Amazon, and selling products to United States residents with the knowledge that such products will be delivered to United States

residents. In addition, the Defendant derives substantial revenue from the sale of infringing products within the United States and operates an Amazon storefront targeting the United States.

10. Venue is proper in this judicial district under 28 U.S.C. § 1391(c)(3) because the Defendant is a foreign person or corporation subject to personal jurisdiction in this District.

BACKGROUND

11. Cellular signal boosting systems (“boosters”), sometimes referred to as “repeaters,” are designed to amplify signals between mobile electronic devices and cell sites to provide consistent connections between cell sites and the mobile electronic devices. Boosters increase the power of a received signal by using an electronic circuit called an amplifier.

12. A booster transmits the amplified cellular signals to a cell site or mobile electronic device via one or more antennas. Similarly, a booster receives cellular signals from a cell site or mobile electronic device via the one or more antennas.

13. Boosters can be used to amplify signals from a cell site and the cellular signal output of mobile electronic devices. Weaker signals can be amplified more than relatively strong signals. For instance, when the strength of the received signal from a cell site is weak (which indicates that the distance between the cell site and the booster is great or significant attenuation has occurred), the amplification of the cellular signals from the cell site by the booster can be relatively high. The booster can also provide significant amplification to cellular signals from the device to ensure that the cellular signals are sent to the cell site with sufficient power to be received. Conversely, when the strength of the received signal from a cell site is strong (which indicates that the distance between the cell site and the booster is small), the amplification of the cellular signals from the cell site and device by the booster can be lower.

14. The internal circuitry and architecture of booster devices are critically important, and without the correct internal architecture booster devices will not properly function.

15. Plaintiff is a leader in cellular phone booster equipment and sells products targeting the cell phone booster market in the United States. The Plaintiff sells its own popular cell phone boosters to the public under the brands “weBoost” and “WilsonPro,” and has acted to protect its many inventions through the filings of numerous patents.

16. Plaintiff’s own cell phone booster products practice its own inventions, including the inventions of the Asserted Patent.

17. The Asserted Patent claims, among other things, an architecture for a common-direction duplexer. The abstract for the Asserted Patent describes the invention as follows:

A common-direction duplexer may include a common port, a first-band port, and a second-band port. The common-direction duplexer may also include a first filter between the common port and the first-band port. The first filter may be configured to pass a first frequency range and filter out a second frequency range and a third frequency range. The first and second frequency ranges may be associated with a first-direction signal transmitted in the first and/or second frequency range. The third frequency range may be spectrally between the first and second frequency ranges and may be associated with a second-direction signal that propagates in a direction opposite that of the first-direction signal. The common-direction duplexer may also include a second filter between the common port and the second-band port. The second filter may be configured to pass the second frequency range and filter out the first and third frequency ranges.

’399 Patent at Abstract

FIRST CLAIM FOR RELIEF
Infringement of the ’399 Patent
35 U.S.C. §§ 1, *et seq.*

18. Plaintiff hereby incorporates and realleges each and every allegation of the preceding paragraphs as if fully set forth herein.

19. Plaintiff owns all rights in the '399 Patent.

20. The '399 Patent is valid, enforceable, and was issued in full compliance of the patent laws of the United States.

21. Plaintiff and its licensees have marked their products in accordance with 35 U.S.C. § 287(a).

22. On information and belief, the Defendant is on notice of the Asserted Patent and aware of the scope of the claims of the Asserted Patent.

23. On information and belief, the Defendant is aware that the Accused Products practice the invention of at least one of the claims of the Asserted Patent.

24. Without license or authorization, Defendant makes, uses, offers for sale, and/or sells the Accused Product which practices the invention of the Asserted Patent.

25. On June 17, 2014, the Asserted Patent, titled "Common-Direction Duplexer" was duly and legally issued. A true and correct copy of the Asserted Patent is attached as Exhibit A.

26. Exemplary claim 3 of the '399 Patent is reproduced below:

3. A signal booster comprising:

a first interface port configured to receive a first-direction signal transmitted in at least one of a first frequency range and a second frequency range;

a second interface port configured to receive a second-direction signal transmitted in a third frequency range spectrally between the first frequency range and the second frequency range, the second-direction signal propagating in a direction opposite that of a propagation direction of the first-direction signal;

a first-direction path communicatively coupled between the first interface port and the second interface port and configured to communicate the first-direction signal from the first interface port toward the second interface port, the first-direction path including:

- a common-direction duplexer configured to pass the first-direction signal based on the first frequency range and the second frequency range such that the common-direction duplexer outputs at least one of a first-frequency-range signal and a second-frequency-range signal, the first-frequency-range signal being associated with the first frequency range and the second-frequency-range signal being associated with the second frequency range, the common-direction duplexer further configured to filter out the third frequency range;
- a first amplifier configured to amplify the first-frequency-range signal and communicate the amplified first-frequency-range signal toward the second interface port; and
- a second amplifier configured to amplify the second-frequency-range signal and communicate the amplified second-frequency-range signal toward the second interface port; and
- a second-direction path communicatively coupled between the second interface port and the first interface port and configured to communicate the second-direction signal from the second interface port toward the first interface port, the second-direction path including:
 - a band pass filter configured to filter the second-direction signal based on the third frequency range such that the second-direction signal passes through the band pass filter, the band pass filter being further configured to filter out the first frequency range and the second frequency range; and
 - a third amplifier configured to amplify the second-direction signal filtered by the band pass filter, the third amplifier further configured to communicate the amplified second-direction signal toward the first interface port.

27. As advertised on Amazon at ASIN B08TWK29NK, the Defendant's Accused Product (including products with the same architecture as the Accused Product) infringe at least claim 3 of the Asserted Patent in the manner shown in Exhibit B.

28. The Defendant sells the Accused Product in the United States on Amazon at ASIN B08TWK29NK as shown in Exhibit C.

29. Numerous customers of the Defendant, in the United States, have purchased the Accused Product and provided reviews of the Accused Product on Amazon as shown in Exhibit D.

30. All of the reviews for the Defendant's product sold in the United States on Amazon at ASIN B08TWK29NK are from United States customers.

31. The Defendant directly infringes claim 3 of the Asserted Patent in the United States by making, using, offering for sale, selling, and/or importing the Accused Product in violation of 35 U.S.C. § 271(a) as shown in Exhibit B.

32. The Defendant is liable for infringement of the Asserted Patent under 35 U.S.C. § 271(a).

33. Defendant's infringement of the Asserted Patent is willful and this case is exceptional, at least because Defendant is aware of the Asserted Patent.

34. Plaintiff has suffered harm as a result of Defendant's infringement of the Asserted Patent, including in the form of lost profits and diverted sales and lost market share. Plaintiff is entitled to recover damages sustained as a result of Defendant's wrongful acts in an amount that is to be proven at trial.

35. Plaintiff has suffered and continues to suffer irreparable harm as a result of the Defendant's sale of infringing products; as such, Plaintiff is entitled to an injunction against the Defendant's infringement of the Asserted Patent.

PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully prays that the Court enter judgment in its favor and award the following relief against the Defendant:

- A. A judgment that the Defendant infringes the Asserted Patent;
- B. A judgment that the Defendant willfully infringes the Asserted Patent;
- C. An award of actual damages in an amount to be determined at trial;
- D. A finding that this case is exceptional;
- E. A judgment for treble damages;
- F. An award of Plaintiff's costs and attorneys' fees pursuant to 35 U.S.C. § 285;
- G. An award of pre-judgment interest and post-judgment interest as allowed by law;
- H. Entry of a permanent injunction against the Defendant's continued infringement of the Asserted Patent; and
- I. Any such other and further relief as the Court deems proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands a jury trial on all matters triable to a jury.

DATED August 28, 2024.

Respectfully submitted,

WORKMAN NYDEGGER

By: /s/ Brian N. Platt
CHAD E. NYDEGGER
BRIAN N. PLATT

Attorneys for Plaintiff Wilson Electronics, LLC