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10 Attorneys for Plaintiff  
11 IN 2 DEVELOPMENTS LLC

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13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 IN 2 DEVELOPMENTS LLC,

16 *Plaintiff,*

17 v.

18 GLOBE ELECTRIC,

19 *Defendant.*

Case No. 2:24-cv-7565

**COMPLAINT FOR PATENT  
INFRINGEMENT**

***JURY TRIAL DEMANDED***

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21 Plaintiff IN 2 Developments LLC (“IN 2”) files this Complaint against Globe  
22 Electric (“Globe Electric”) for patent infringement of United States patent nos.  
23 9,702,510 and 9,995,436 (collectively the “patents-in-suit”) and alleges as follows:

24 **JURISDICTION**

25 1. This action arises under the patent laws of the United States, 35 U.S.C.  
26 §§ 1 et seq. This Court therefore has subject matter jurisdiction under 28 U.S.C.  
27 § 1331 (federal question) and § 1338(a) (patents).  
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1 **THE PARTIES**

2 2. Plaintiff IN 2 is a Limited-Liability Company organized under the  
3 laws of the State of Minnesota with its principal place of business at 18208 County  
4 Road 36, Crosby, MN 56441.

5 3. Plaintiff’s principal, Mr. Deloren E, Anderson (“Mr. Anderson”) is the  
6 CEO/Owner of IN 2 Developments LLC, which is the entity that owns the patents-  
7 in-suit.

8 4. On information and belief, Defendant Globe Electric is a Canadian  
9 company with a principal address at 105 Avenue Oneida Montreal, QC H9R 1A8  
10 Canada.

11 **PERSONAL JURISDICTION AND VENUE**

12 5. On information and belief, Globe Electric is subject to personal  
13 jurisdiction in the State of California in accordance with due process and/ or the  
14 California Long Arm Statute because, in part, Globe Electric has committed, and  
15 continues to commit, acts of infringement in the State of California, has conducted  
16 business in the State of California, and/ or has engaged in continuous and  
17 systematic activities in the State of California.

18 6. On information and belief, Globe Electric offers to sell, or sells a  
19 variety of LED Lightbulbs throughout the United States, including in the State of  
20 California, including without limitation its Vintage LED BULB – 60W replacement  
21 bulb and other LED Lightbulbs that rely on, use, and/or employ the same and/or  
22 similar design and construction of Globe Electric’s Vintage LED BULB – 60W  
23 replacement bulb (hereinafter referred to collectively and individually as the “Globe  
24 Electric Products”).

25 7. On information and belief, the accused Globe Electric Products  
26 infringe one or more claims of each of the patents-in-suit.

27 8. This court has personal jurisdiction and subject matter jurisdiction over  
28 Globe Electric because it committed and continues to commit acts of infringement

1 in this judicial district in violation of 35 U.S.C. § 271(a). In particular, on  
2 information and belief, Globe Electric has made, offered to sell or sold infringing  
3 products in this judicial district, including the accused Globe Electric Products.

4 9. On information and belief, Globe Electric is subject to the Court’s  
5 jurisdiction because it regularly conducts and solicits business, or otherwise  
6 engages in a persistent course of conduct in this district, and/or derives substantial  
7 revenue from the sale and distribution of goods and services provided to individuals  
8 and businesses in the United States and within this district.

9 10. This court has personal and subject matter jurisdiction over Globe  
10 Electric because, on information and belief, Globe Electric: (1) has committed acts  
11 of patent infringement in the United States and this judicial district, (2) has  
12 substantial, continuous, and systematic contacts with the United States, this State  
13 and this judicial district; (3) owns, manages, and operates facilities in the United  
14 States, this State and this judicial district; (4) enjoys substantial income from its  
15 operations and sales in the United States, this State and this judicial district; and  
16 (5) solicits business and markets products, systems and/or services in the United  
17 States, this State and judicial district including, without limitation, the infringing  
18 Globe Electric Products.

19 11. Venue is proper also because Globe Electric has transacted business in  
20 this district and has directly committed acts of patent infringement in this district,  
21 and because Globe Electric is a foreign corporation not residing in a United States  
22 judicial district, and, therefore, may be sued in any judicial district in accordance  
23 with 28 U.S.C. § 1391(c)(3).

24 **THE ASSERTED PATENTS**

25 **United States Patent No. 9,702,510 and Patent No. 9,995,436**

26 12. On July 11, 2017, the United States Patent and Trademark Office  
27 (“USPTO”) duly and legally issued United States patent no. 9,702,510 (“the ‘510  
28 patent”) entitled “LED LIGHT BULB” to inventor Deloren E. Anderson.

1 13. The '510 patent is presumed valid under 35 U.S.C. § 282.

2 14. IN 2 owns all rights, title, and interest in the '510 patent.

3 15. IN 2 has not granted Globe Electric a license to the rights under the  
4 '510 patent.

5 16. On Jun 12, 2018, the United States Patent and Trademark Office  
6 ("USPTO") duly and legally issued United States patent no. 9,995,436 ("the '436  
7 patent") entitled "LED LIGHT BULB" to inventor Deloren E. Anderson.

8 17. The '436 patent is presumed valid under 35 U.S.C. § 282.

9 18. IN 2 owns all rights, title, and interest in the '436 patent.

10 19. IN 2 has not granted Globe Electric a license to the rights under the  
11 '436 patent.

12 20. The '510 and '436 patents observed that, at the time of the invention,  
13 traditional lighting solutions did not fully capitalize on the benefits of LEDs, which  
14 included longer lifespans and higher energy efficiency. There was a need for light  
15 bulbs that combined these advantages of LEDs with conventional designs for  
16 broader acceptance and application.

17 21. The claimed invention(s) of the '510, and '436 patent sought to solve  
18 these problems with the integration of LED circuitry into the structure of  
19 conventional light bulbs, and improve upon existing light bulb designs.

20 22. The '510 and '436 patents describe as one implementation, among  
21 other things, the use of a substantially cylindrical elongated filament that is  
22 supported by conductive contacts and encased in a bulb, with LED channels  
23 disposed within the filament to enhance lighting efficiency and longevity.

24 23. The specification of the '510 and '436 patents and the invention(s)  
25 claimed in the patent solve inter alia various technological problems inherent in  
26 integrating LED technology into traditional bulb designs by creating a light bulb  
27 that (1) includes an Edison style base, (2) features LED circuitry coupled to the  
28 base, (3) employs a conductive structure with proximal and distal contacts,

1 (4) incorporates an elongated filament that extends into the bulb and is encased by  
2 it, (5) integrates an LED channel within the filament, and (6) contains an inert gas  
3 within the bulb.

4 **CLAIMS FOR RELIEF**

5 **Count I Infringement of United States Patent No. 9,702,510**

6 24. IN 2 realleges and incorporates by reference, as if fully set forth here,  
7 the allegations of the previous paragraphs above.

8 25. On information and belief, Globe Electric infringes (literally and/ or  
9 under the doctrine of equivalents) at least claim 1 of the '510 patent because it  
10 makes, sells, imports and/ or offers to sell the Globe Electric Products in the United  
11 States in violation of 35 U.S.C. § 271(a).

12 26. On information and belief, and as shown below, the Globe Electric  
13 Products exhibit a Light Bulb comprising an Edison style base.



24 27. On information and belief, and as shown below, the Globe Electric  
25 Products exhibit a bulb sealed about the base and extending above the base.

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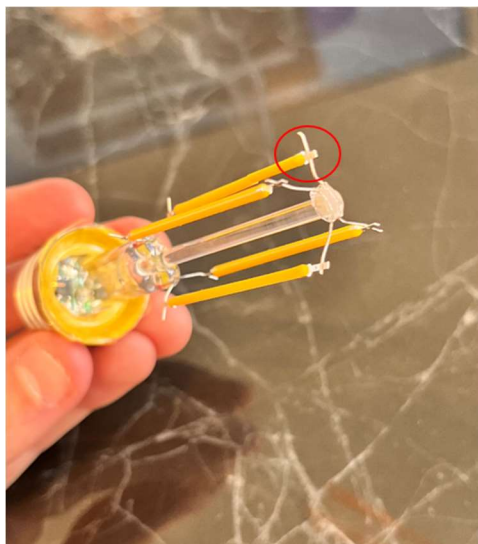
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28. On information and belief, and as shown below, the Globe Electric Products exhibit ‘a conductive structure including a proximal contact that is proximate the base [...] and a first distal contact that is distal from the base.’



1           29. On information and belief, and as shown below, the Globe Electric  
2 Products exhibit ‘a substantially cylindrical elongated filament [...]



13 ‘[...] supported on a first proximate filament end by the first proximate contact; and  
14 supported on a first distal filament end by the first distal contact; the filament  
15 extending from the base into the bulb above the base [...]



1 ‘[...] wherein the bulb entirely encases the elongated filament.’  
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12 30. On information and belief, and as shown below, the Globe Electric  
13 Products exhibit a ‘light emitting diode channel disposed within the filament,  
14 coupled to the light emitting diode circuitry, and extending into the bulb above the  
15 base.’  
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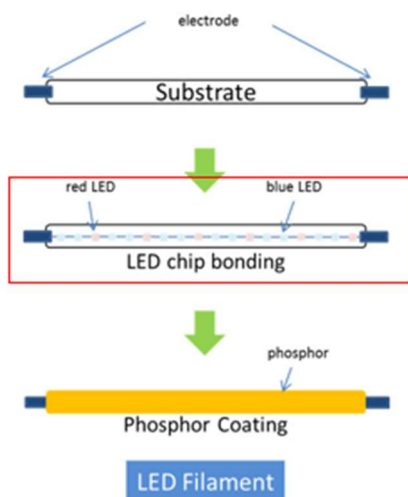




1 31. On information and belief, and as shown below, the Globe Electric  
2 Products exhibit a 'light emitting diode channel disposed within the filament,  
3 coupled to the light emitting diode circuitry, and extending into the bulb above the  
4 base.'



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16 32. On information and belief, and as shown above and below, Globe  
17 Electric Products exhibit a light emitting diode channel disposed within the  
18 filament, coupled to the light emitting diode circuitry, and extending into the bulb  
19 above the base.'



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Figure 1. Filament manufacturing process

1 33. Globe Electric's direct infringement has damaged IN 2 and caused it to  
2 suffer and continue to suffer irreparable harm and damages.

3 **Count II Infringement of United States Patent No. 9,995,436**

4 34. IN 2 realleges and incorporates by reference, as if fully set forth here,  
5 the allegations of the previous paragraphs above.

6 35. On information and belief, Globe Electric infringes (literally and/ or  
7 under the doctrine of equivalents) at least claim 1 of the '436 patent because it  
8 makes, sells, imports and/ or offers to sell the Globe Electric Products in the United  
9 States in violation of 35 U.S.C. § 271(a).

10 36. On information and belief, and as shown below, the Globe Electric  
11 Products exhibit a Light Bulb comprising an Edison style base.



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37. On information and belief, and as shown below, the Globe Electric Products exhibit a bulb sealed about the base and extending above the base.



38. On information and belief, and as shown below, the Globe Electric Products exhibit ‘a conductive structure including a proximal contact that is proximate the base [...] and a first distal contact that is distal from the base.’



1           39. On information and belief, and as shown below, the Globe Electric  
2 Products exhibit ‘a substantially cylindrical elongated filament [...]



13 ‘[...] supported on a first proximate filament end by the first proximate contact; and  
14 supported on a first distal filament end by the first distal contact; the filament  
15 extending from the base into the bulb above the base [...]



1 '[...] wherein the bulb entirely encases the elongated filament.'

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40. On information and belief, and as shown below, the Globe Electric Products exhibit a 'light emitting diode circuitry coupled to the base.'

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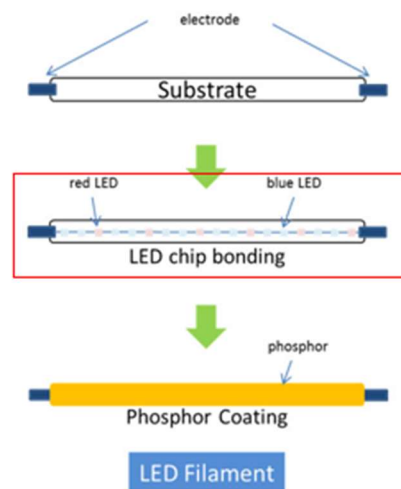
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1 41. On information and belief, and as shown below, the Globe Electric  
2 Products exhibit a ‘light emitting diode channel disposed within the filament,  
3 coupled to the light emitting diode circuitry, and extending into the bulb above the  
4 base.’



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15 42. On information and belief, and as shown above and below, Globe  
16 Electric Products exhibit a light emitting diode channel disposed within the  
17 filament, coupled to the light emitting diode circuitry, and extending into the bulb  
18 above the base.’



29 Figure 1. Filament manufacturing process

30 See “Claim chart-Globe Electric- 1&2”- 11.

1 43. Globe Electric’s direct infringement has damaged IN 2 and caused it to  
2 suffer and continue to suffer irreparable harm and damages.

3 **PRAYER FOR RELIEF**

4 IN 2 respectfully requests this Court to enter judgment in IN 2’s favor against  
5 Globe Electric as follows:

- 6 A. finding that Globe Electric has infringed one or more claims of the  
7 ’510 patent under 35 U.S.C. § 271(a);
- 8 B. finding that Globe Electric has infringed one or more claims of the  
9 ’436 patent under 35 U.S.C. § 271(a);
- 10 C. awarding IN 2 damages under 35 U.S.C. § 284, or otherwise permitted  
11 by law, including supplemental damages for any continued post-  
12 verdict infringement;
- 13 D. awarding IN 2 pre-judgment and post-judgment interest on the  
14 damages award and costs;
- 15 E. awarding the costs of this action (including all disbursements) and  
16 attorney fees pursuant to 35 U.S.C. § 285, or as otherwise permitted by  
17 the law; and
- 18 F. awarding such other costs and further relief that the Court determines  
19 to be just and equitable.

20 **JURY DEMANDED**

21 Under Federal Rule of Civil Procedure 38(b), IN 2 hereby requests a trial by  
22 jury on all issues so triable.

23 Dated: September 5, 2024 **PERKOWSKI LEGAL, PC**  
24 **DAIGNAULT IYER LLP**

25  
26 By:  /s/ Peter Perkowski  
Peter E. Perkowski  
27 Attorneys for Plaintiff  
28 IN 2 Developments LLC