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8 *Attorney for Plaintiff*

9 **UNITED STATES COURT**  
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

11 **AKILA TECH CO., LTD**

12 **Plaintiff**

13 **v.**

14 **KSTRONG, INC, and**

15 **KARAM, INC.**

16 **Defendants**

17 Case No.:

18 **COMPLAINT**

19 **JURY TRIAL DEMANDED**

20 Plaintiff AKILA TECH CO., LTD., by and through its attorneys, for its Complaint against defendant  
21 KSTRONG, INC, and defendant KARAM, INC. (“**Defendants**”), alleges as follows:

22 **PRELIMINARY STATEMENT**

23 1. This is an action for infringement of Plaintiff’s United States Patent No. 9,435,484 under the  
24 Patent Act, 35 U.S.C. § 271, based on Defendants’ unauthorized commercial manufacture, use,  
25 importation, offer for sale, and sale of SAFETY CATCH CONNECTORS in the United States.

26 **JURISDICTION**

27 2. This court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§  
28 1331 and 1338(a).

3. Defendants are foreign corporations whereby the venue protections afforded by 28 U.S.C. §

1 1400(b) do not apply.

2 4. Personal jurisdiction over Defendants is proper in this District because Defendants have availed  
3 themselves of the rights and benefits of the laws of California, and they have derived substantial revenue  
4 from the sales of Safety Catch Connectors in California. Defendants have systematic and continuous  
5 business contacts with California. Defendants advertise in California and target customers in California.

6 **VENUE**

7 5. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b).

8 **PARTIES**

9 6. AKILA TECH CO., LTD. is a corporation that is incorporated in Taiwan and has its principal  
10 place of business in Changhua County, Taiwan, R.O.C.

11 7. On information and belief, KSTRONG, INC., is a wholly owned subsidiary of KARAM, INC., a  
12 corporation that is incorporated in India and his its principal place of business in Uttar Pradesh.

13 **FACTS**

14 **I. THE ASSERTED PATENT**

15 8. United States Patent Number 9,435,484 (the “**484 Patent**”), entitled SAFETY CATCH  
16 CONNECTOR, was duly and legally issued on 06 SEP 2016, and names Kai Chieh Yang and Yi Ching Lin  
17 as inventors. Attached as **Exhibit A** is a true and correct copy of the ‘484 Patent.

18 9. The ‘484 Patent discloses a safety catch connector devised with dual locking elements to prevent  
19 inadvertent release of the connector during use.

20 10. The ‘484 Patent claims, among other things, a safety catch connector comprising a catch member,  
21 a locking shaft, a first controlling unit comprising a first locking element, and a second controlling unit  
22 comprising a controlling latch and a second locking element, wherein to open the safety catch connector  
23 the first locking element and the controlling latch are pressed at the same time.

24 11. Plaintiff is the owner of the entire right, title, and interest in the ‘484 Patent.

25 **II. DEFENDANT’S INFRINGING ACTIVITIES AND PRODUCTS**

26 12. Defendants have infringed, and continue to infringe, the ‘484 Patent by using, selling, and offering  
27 for sale, safety catch connectors in the United States and importing into the United States safety catch  
28 connectors that embody or use the inventions claimed in the ‘484 Patent. For example, Defendants’

1 Twin/Single Connector with Steel Pin employs dual locking elements that perform the same or  
2 substantially the same function in the same or substantially the same way to achieve the same or  
3 substantially the same result as set forth and claimed in the '484 Patent. An example of Defendants'  
4 Twin/Single Connector with Steel Pin (ANSI) is included herewith as **Exhibit B**.

5 13. Defendants have known of the existence of the '484 Patent, and their acts of infringement have  
6 been willful and in disregard of the '484 Patent, without reasonable basis for believing that they had a right  
7 to engage in the infringing conduct.

8 **COUNT ONE**

9 **(Patent Infringement)**

10 14. Plaintiff repeats and realleges paragraphs 1 through 13 hereof, as if full set forth herein.

11 15. Upon information and belief, Defendants have been and are infringing the '484 Patent by making,  
12 using, selling, or offering for sale in the United States, or importing into the United States, including within  
13 this judicial district, safety catch connectors, including those sold under the name KStrong® Twin/Single  
14 Connector with Steel Pin (ANSI) (**Exhibit B**), in violation of 35 U.S.C. § 271(a).

15 16. Upon information and belief, Defendants have been and are inducing infringement of the '484  
16 Patent by actively and knowingly inducing others to make, use, sell, offer for sale, or import safety catch  
17 connectors that embody or use the invention claimed in the '484 Patent, including those sold under the  
18 name KStrong® Twin/Single Connector with Steel Pin (ANSI), in violation of 35 U.S.C. § 271(b).

19 17. Upon information and belief, Defendants have been and are contributing to the infringement of the  
20 '484 Patent by selling or offering to sell safety catch connectors, knowing them to be especially made or  
21 especially adapted for practicing the invention of the '484 Patent and not a staple article or commodity of  
22 commerce suitable for substantial non-infringing use, in violation of 35 U.S.C. § 271(c).

23 18. Defendants' infringement has been and continues to be knowing, intentional, and willful.

24 19. Defendants' acts of infringement of the '484 Patent have caused and will continue to cause Plaintiff  
25 damages for which Plaintiff is entitled to compensation pursuant to 35 U.S.C. § 284.

26 20. Defendants' acts of infringement of the '484 Patent have caused and will continue to cause Plaintiff  
27 immediate and irreparable harm unless such infringing activities are enjoined by this Court pursuant to 35  
28 U.S.C. § 283. Plaintiff has no adequate remedy at law.

1 21. This case is exceptional and, therefore, Plaintiff is entitled to an award of attorney fees pursuant to  
2 35 U.S.C. § 285.

3  
4 **WHEREFORE**, Plaintiff requests judgment against Defendants as follows:

5 1. Adjudging that Defendants have infringed and actively induced infringement of, and contributorily  
6 infringed the '484 Patent, in violation of 35 U.S.C. § 271(a), (b), and (c);

7 2. Granting an injunction temporarily and preliminarily and permanently enjoining Defendants, their  
8 employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries, and assigns, and all of  
9 those in active concert and participation with any of the foregoing persons or entities from infringing,  
10 contributing to the infringement of, or inducing infringement of the '484 Patent;

11 3. Ordering Defendants to account and pay damages adequate to compensate Plaintiff for Defendants'  
12 infringement of the '484 Patent, including for any infringing acts not presented at trial and pre-judgment  
13 and post-judgment interest and costs, pursuant to 35 U.S.C. § 284;

14 4. Ordering an accounting for any infringing sales not presented at trial and an award by the court of  
15 additional damages for any such infringing sales;

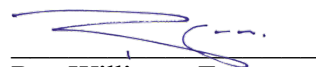
16 5. Ordering that the damages award be increased up to three times the actual amount assessed,  
17 pursuant to 35 U.S.C. § 284;

18 6. Declaring this case exceptional and awarding Plaintiff its reasonable attorney fees pursuant to 35  
19 U.S.C. § 285; and

20 7. Awarding such other and further relief as this Court deems just and proper.

21  
22 Dated: 11 NOV 2024  
23 LITTLETON, COLORADO

Respectfully submitted,

  
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*Attorney for Plaintiff*

**VERIFICATION**

I have read the foregoing Complaint and know its contents. I am the owner of AKILA TECH CO. LTD., a party to this action. The matters stated in the foregoing Complaint are true to my own knowledge, except as to the matters which are therein stated upon information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct.

Executed at Taichung, Taiwan, this 11 day of November, 2024.

\_\_\_\_\_  
YANG, Ryan  
OWNER  
AKILA TECH. CO. LTD.

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*Attorney for Plaintiff*

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YANG, Ryan  
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