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11 Attorneys for Plaintiff
NATIONAL PRODUCTS INC.

12
13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 SOUTHERN DIVISION

16
17 NATIONAL PRODUCTS INC.,
18 Plaintiff,
19 v.
20 DANA INNOVATIONS, INC d/b/a
SONANCE AND iPORT,
21 Defendant.

Case No.: 8:24-cv-02499

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

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ATTORNEYS AT LAW

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1 Plaintiff National Products Inc. (“NPI” or “Plaintiff”) brings this action
2 against Defendant Dana Innovations, Inc. d/b/a Sonance and iPort (“iPort” or
3 “Defendant”) for an injunction, damages, and other appropriate relief to stop iPort
4 from violating NPI’s patent rights. NPI states and alleges as follows:

5 **THE PARTIES**

6 1. NPI is a corporation organized and existing under the laws of the State
7 of Washington, having its principal place of business at 8410 Dallas Avenue S.,
8 Seattle, Washington 98108.

9 2. NPI is a market leader in the design, manufacture, and sale of
10 innovative docking cradles and protective cover products, including docking
11 cradles and protective covers for tablets, cellular phones, and other portable
12 devices, which are used, for example, in cars, trucks, bikes, planes, boats,
13 motorcycles, and in offices, homes, retail stores, and healthcare settings.

14 3. Upon information and belief, Dana Innovations, Inc. d/b/a Sonance
15 and iPort is a corporation organized and existing under the laws of the State of
16 California having its principal place of business at 991 Calle Amanecer, San
17 Clemente, California 92673.

18 4. Upon information and belief, iPort is in the business of providing
19 protective covers and docking systems for portable electronic devices, including the
20 products that are at issue in this lawsuit. Upon information and belief, iPort
21 advertises, markets, and sells its products, including the products that are the
22 subject of the patent infringement alleged in this lawsuit, to the public throughout
23 the United States, including within this judicial district.

24 **NATURE OF THE ACTION**

25 5. This is a civil action for infringement of U.S. Patent Nos. 10,778,275
26 (“the ’275 patent”); 11,165,458 (“the ’458 patent”); 12,132,511 (“the ’511 patent”);
27 12,143,140 (“the ’140 patent”); 12,143,141 (“the ’141 patent”); and 12,143,142
28 (“the ’142 patent”) under the patent laws of the United States, including, without

1 limitation, 35 U.S.C. § 1 *et seq.*

2 **JURISDICTION AND VENUE**

3 6. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and
4 1338(a).

5 7. This Court has personal jurisdiction over iPort. Upon information and
6 belief, iPort maintains a regular and established place of business in this judicial
7 district. This Court also has personal jurisdiction over iPort because, upon
8 information and belief, iPort has committed, aided, abetted, contributed to, and/or
9 participated in the commission of patent infringement in this judicial district.

10 8. Upon information and belief, iPort sells and offers to sell its infringing
11 products directly through its website to the public throughout the United States,
12 including this judicial district.

13 9. Upon information and belief, iPort has its headquarters and principal
14 place of business within this judicial district. For example, iPort lists the following
15 address on its main webpage: 991 Calle Amanecer, San Clemente, CA 92673.
16 <https://www.sonance.com/> and <https://www.iportproducts.com/>. Upon information
17 and belief, iPort has listed this same address as its principal place of business with
18 the California Secretary of State.

19 10. Venue is proper in this judicial district under 28 U.S.C. §§ 1391 and
20 1400(b), because iPort has committed acts of infringement in this District, and upon
21 information and belief, iPort has a regular and established place of business in this
22 District.

23 **THE '275 PATENT**

24 11. On September 15, 2020, the '275 patent, entitled "Docking Sleeve
25 With Electrical Adapter" was duly and legally issued to Jeffrey D. Carnevali. The
26 '275 patent is generally directed toward a docking cradle for an accessory device,
27 such as, for example, a cellular phone, phablet, tablet, handheld device, or the like.

28 12. NPI is the owner, by assignment, of all right, title, and interest in the

1 '275 patent, including the rights to exclude others and to sue and recover damages
2 for infringement.

3 13. To the extent any marking or notice was required by 35 U.S.C. § 287,
4 NPI and/or all predecessors in interest and/or implied or express licensees of the
5 '275 patent, if any, have complied with the marking requirements of 35 U.S.C.
6 § 287 by fixing the word “patented” together with the address of NPI’s website,
7 which is accessible to the public without charge and which associates the patented
8 article with the '275 patent in the “Patent and Trademarks” page of NPI’s website,
9 on all goods made, offered for sale, sold, and/or imported into the United States that
10 embody one or more claims of the '275 patent.

11 14. A true and correct copy of the '275 patent is attached as **Exhibit A**.

12 **THE '458 PATENT**

13 15. On November 2, 2021, the '458 patent, entitled “Docking Sleeve With
14 Electrical Adapter” was duly and legally issued to Jeffrey D. Carnevali. The '458
15 patent is generally directed toward a docking cradle for an accessory device, such
16 as, for example, a cellular phone, phablet, tablet, handheld device, or the like.

17 16. NPI is the owner, by assignment, of all right, title, and interest in the
18 '458 patent, including the rights to exclude others and to sue and recover damages
19 for infringement.

20 17. To the extent any marking or notice was required by 35 U.S.C. § 287,
21 NPI and/or all predecessors in interest and/or implied or express licensees of the
22 '458 patent, if any, have complied with the marking requirements of 35 U.S.C.
23 § 287 by fixing the word “patented” together with the address of NPI’s website,
24 which is accessible to the public without charge and which associates the patented
25 article with the '458 patent in the “Patent and Trademarks” page of NPI’s website,
26 on all goods made, offered for sale, sold, and/or imported into the United States that
27 embody one or more claims of the '458 patent.

28 18. A true and correct copy of the '458 patent is attached as **Exhibit B**.

THE '511 PATENT

19. On October 29, 2024, the '511 patent, entitled “Docking Sleeve With Electrical Adapter” was duly and legally issued to Jeffrey D. Carnevali. The '511 patent is generally directed toward a docking cradle for an accessory device, such as, for example, a cellular phone, phablet, tablet, handheld device, or the like.

20. NPI is the owner, by assignment, of all right, title, and interest in the '511 patent, including the rights to exclude others and to sue and recover damages for infringement.

21. To the extent any marking or notice was required by 35 U.S.C. § 287, NPI and/or all predecessors in interest and/or implied or express licensees of the '511 patent, if any, have complied with the marking requirements of 35 U.S.C. § 287 by fixing the word “patented” together with the address of NPI’s website, which is accessible to the public without charge and which associates the patented article with the '511 patent in the “Patent and Trademarks” page of NPI’s website, on all goods made, offered for sale, sold, and/or imported into the United States that embody one or more claims of the '511 patent.

22. A true and correct copy of the '511 patent is attached as **Exhibit C**.

THE '140 PATENT

23. On November 12, 2024, the '140 patent, entitled “Docking Sleeve With Electrical Adapter” was duly and legally issued to Jeffrey D. Carnevali. The '140 patent is generally directed toward a docking cradle for an accessory device, such as, for example, a cellular phone, phablet, tablet, handheld device, or the like.

24. NPI is the owner, by assignment, of all right, title, and interest in the '140 patent, including the rights to exclude others and to sue and recover damages for infringement.

25. To the extent any marking or notice was required by 35 U.S.C. § 287, NPI and/or all predecessors in interest and/or implied or express licensees of the '140 patent, if any, have complied with the marking requirements of 35 U.S.C.

1 § 287 by fixing the word “patented” together with the address of NPI’s website,
2 which is accessible to the public without charge and which associates the patented
3 article with the ’140 patent in the “Patent and Trademarks” page of NPI’s website,
4 on all goods made, offered for sale, sold, and/or imported into the United States that
5 embody one or more claims of the ’140 patent.

6 26. A true and correct copy of the ’140 patent is attached as **Exhibit D**.

7 **THE ’141 PATENT**

8 27. On November 12, 2024, the ’141 patent, entitled “Docking Sleeve
9 With Electrical Adapter” was duly and legally issued to Jeffrey D. Carnevali. The
10 ’141 patent is generally directed toward a docking cradle for an accessory device,
11 such as, for example, a cellular phone, phablet, tablet, handheld device, or the like.

12 28. NPI is the owner, by assignment, of all right, title, and interest in the
13 ’141 patent, including the rights to exclude others and to sue and recover damages
14 for infringement.

15 29. To the extent any marking or notice was required by 35 U.S.C. § 287,
16 NPI and/or all predecessors in interest and/or implied or express licensees of the
17 ’141 patent, if any, have complied with the marking requirements of 35 U.S.C.
18 § 287 by fixing the word “patented” together with the address of NPI’s website,
19 which is accessible to the public without charge and which associates the patented
20 article with the ’141 patent in the “Patent and Trademarks” page of NPI’s website,
21 on all goods made, offered for sale, sold, and/or imported into the United States that
22 embody one or more claims of the ’141 patent.

23 30. A true and correct copy of the ’141 patent is attached as **Exhibit E**.

24 **THE ’142 PATENT**

25 31. On November 12, 2024, the ’142 patent, entitled “Docking Sleeve
26 With Electrical Adapter” was duly and legally issued to Jeffrey D. Carnevali. The
27 ’142 patent is generally directed toward a docking cradle for an accessory device,
28 such as, for example, a cellular phone, phablet, tablet, handheld device, or the like.

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MOUNTAIN VIEW

1 32. NPI is the owner, by assignment, of all right, title, and interest in the
2 '142 patent, including the rights to exclude others and to sue and recover damages
3 for infringement.

4 33. To the extent any marking or notice was required by 35 U.S.C. § 287,
5 NPI and/or all predecessors in interest and/or implied or express licensees of the
6 '142 patent, if any, have complied with the marking requirements of 35 U.S.C.
7 § 287 by fixing the word “patented” together with the address of NPI’s website,
8 which is accessible to the public without charge and which associates the patented
9 article with the '142 patent in the “Patent and Trademarks” page of NPI’s website,
10 on all goods made, offered for sale, sold, and/or imported into the United States that
11 embody one or more claims of the '142 patent.

12 34. A true and correct copy of the '142 patent is attached as **Exhibit F**.

13 **COUNT I**
14 **INFRINGEMENT OF UNITED STATES PATENT NO. 10,778,275**

15 35. NPI realleges and incorporates by reference the allegations in
16 paragraphs 1–34 above.

17 36. iPort has directly infringed and continues to directly infringe at least
18 claims 8-10 of the '275 patent by making, using, offering to sell, and selling within
19 the United States and/or importing into the United States powered docking systems
20 for and used with portable electronic devices, including but not limited to iPort’s
21 Connect Pro line of products.

22 37. Inspection of the Connect Pro line of products demonstrates that they
23 meet each and every element of claims 8-10 of the '275 patent, either literally or by
24 the doctrine of equivalents.

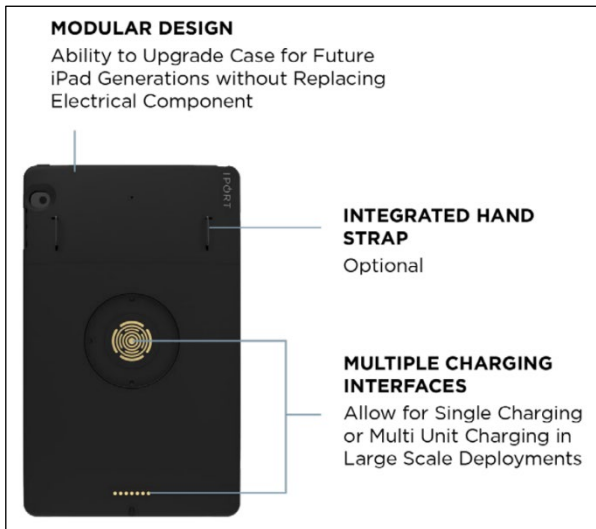
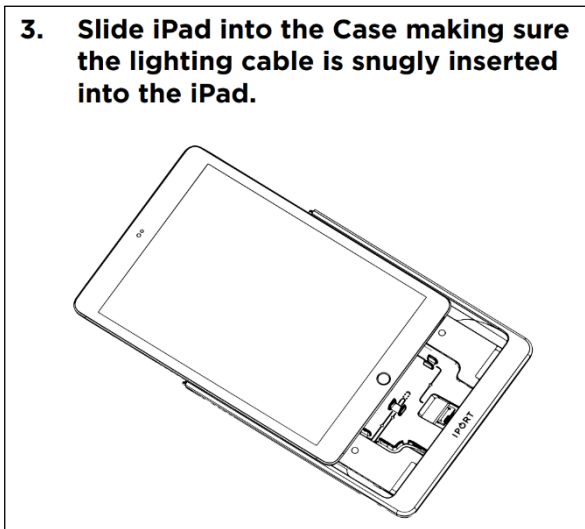
25 38. For example, iPort’s Connect Pro line of products comprise the
26 docking system of claims 8-10:
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39. As shown above and below, the Connect Pro products comprise an arrangement for receiving an electronic device, the arrangement comprising a cover comprising a panel and a skirt surrounding the panel, the panel comprising an exterior surface, wherein the panel and the skirt form an interior cavity therebetween, wherein the interior cavity is configured and arranged to receive an electronic device, and wherein the cover is configured and arranged to cover a back face of the electronic device with the panel, to at least partially cover a plurality of side faces of the electronic device, and to extend around a peripheral edge of a front face of the electronic device to secure the electronic device within the cover:

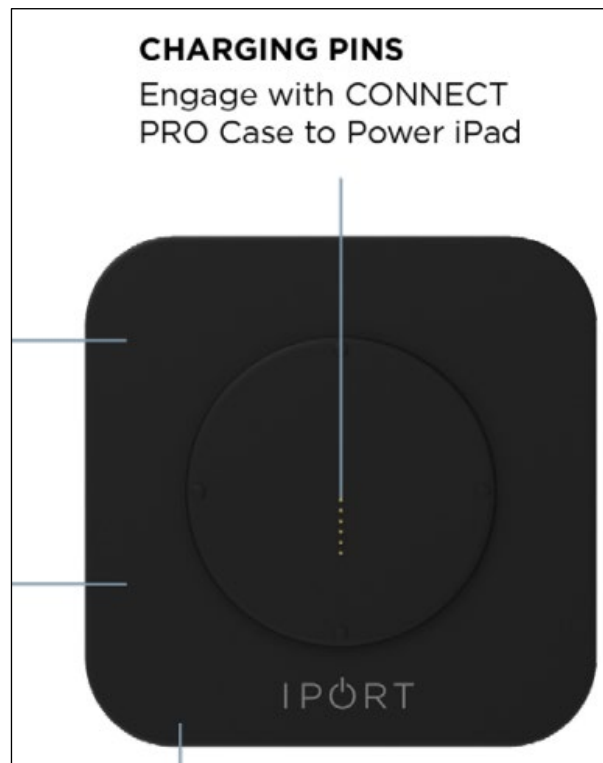


1 40. As shown above, the Connect Pro products further comprise a male
2 plug comprising a plurality of connectors extending into the interior cavity of the
3 cover, wherein the male plug is positioned in the cover for mating with a female
4 socket of the electronic device when received in the cover.

5 41. Also as shown above, the Connect Pro products comprise a contactor
6 disposed on the exterior surface of the panel and configured to be positioned over
7 the back face of the electronic device when the electronic device is received in the
8 interior cavity, the contactor comprising a plurality of electrical contacts.

9 42. The Connect Pro products further comprise electrical connectors
10 extending within the cover and electrically interconnecting the electrical contacts of
11 the contactor with the connectors of the male plug.

12 43. Additionally, the Connect Pro products further comprise a docking
13 connector comprising a plurality of biasing, pogo pin docking contacts arranged in
14 a single line and to connect with the plurality of electrical contacts of the contactor:



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28 44. Upon information and belief, iPort has induced and continues to

1 induce infringement of one or more claims of the '275 patent, including but not
2 limited to claims 8-10, by inducing its customers and other third parties to use
3 without authorization the docking systems claimed in the '275 patent. The use,
4 without authorization, of the docking system constitutes infringement, literally or
5 under the doctrine of equivalents, of one or more claims of the '275 patent by such
6 customers or third parties. iPort's acts of inducement include: providing its
7 customers with the claimed docking systems and components thereof and intending
8 customers to use according to their intended use; advertising these products and
9 their intended use through its own and third-party websites (for example,
10 <https://www.iportproducts.com/Product/cpcase>); and providing instructions on how
11 to use these products (for example, [https://images.salsify.com/image/upload/s--
12 IilBc-wI--/gr3dj2isvln2esklzvak.pdf](https://images.salsify.com/image/upload/s--IilBc-wI--/gr3dj2isvln2esklzvak.pdf)).

13 45. Upon information and belief, iPort has contributed to and continues to
14 contribute to the infringement of one or more claims of the '275 patent, including
15 but not limited to claims 8-10, by, without authority, selling and/or offering to sell
16 within the United States, importing, and/or supplying components of systems that
17 comprise the patented invention, including but not limited to protective covers and
18 docking cradles. These components supplied by iPort are key components to the
19 docking systems claimed in the '275 patent. When, for example, a protective cover
20 is used with a docking cradle, the claimed docking systems are formed, thereby
21 infringing, either literally or under the doctrine of equivalents, one or more claims
22 of the '275 patent. Upon information and belief, iPort supplied and continues to
23 supply these components, with the knowledge of the '275 patent and with the
24 knowledge that these components constitute material parts of the inventions
25 claimed in the '275 patent. Further, iPort knows that these components are
26 especially made and/or especially adapted for use as claimed in the '275 patent.
27 Moreover, iPort knows that there is no substantial non-infringing use of these
28 components.

1 46. As a direct and proximate consequence of iPort’s infringement of the
2 ’275 patent, NPI has suffered irreparable harm, and NPI will continue to suffer
3 irreparable harm in the future unless iPort is enjoined from infringing the ‘275
4 patent.

5 47. iPort has had actual knowledge of the ’275 patent and its infringement
6 thereof since at least January 17, 2024, when NPI notified iPort that the
7 manufacture, sale, offering for sale, importation, and/or use of these products
8 infringes the ’275 patent.

9 48. Upon information and belief, iPort’s continued infringement of the
10 ’275 patent is willful.

11 **COUNT II**
12 **INFRINGEMENT OF UNITED STATES PATENT NO. 11,165,458**

13 49. NPI realleges and incorporates by reference the allegations in
14 paragraphs 1–48 above.

15 50. iPort has directly infringed and continues to directly infringe at least
16 claim 12 of the ’458 patent by making, using, offering to sell, and selling within the
17 United States and/or importing into the United States powered docking systems for
18 and used with portable electronic devices, including but not limited to iPort’s
19 Connect Phone line of products.

20 51. Inspection of the Connect Phone line of products demonstrates that
21 they meet each and every element of claim 12 of the ’458 patent, either literally or
22 by the doctrine of equivalents.

23 52. For example, the Connect Phone products comprise a protective
24 arrangement comprising a removable cover comprising a panel and a skirt that
25 meets edges of the panel, the removable cover comprising an exterior surface and
26 an adapter opening through the exterior surface, wherein the panel and the skirt
27 form an interior cavity therebetween, and the skirt forming a mouth opening that
28 communicates with the interior cavity, wherein the interior cavity is configured and

1 arranged to receive an electronic device:
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53. Further, the Connect Phone products comprise an adapter comprising a male plug extending in a longitudinal direction into the interior cavity of the removable cover in an arrangement for mating with a female socket of the electronic device and a contactor opposite the male plug and configured for exposure through the adapter opening in the exterior surface of the removable cover:

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54. As shown above, the contactor of the Connect Phone products comprises a lateral surface recessed relative to the removable cover and a plurality of electrical contacts arranged on the lateral surface and configured for exposure through the adapter opening of the removable cover, wherein the electrical contacts are electrically coupled to one or more of the connectors of the male plug, wherein the longitudinal direction of the male plug is perpendicular to the lateral surface of the contactor.

1 55. Upon information and belief, iPort has induced and continues to
2 induce infringement of one or more claims of the '458 patent, including but not
3 limited to claim 12, by inducing its customers and other third parties to use without
4 authorization the docking systems claimed in the '458 patent. The use, without
5 authorization, of the docking system constitutes infringement, literally or under the
6 doctrine of equivalents, of one or more claims of the '458 patent by such customers
7 or third parties. iPort's acts of inducement include: providing its customers with
8 the claimed docking systems and components thereof and intending customers to
9 use according to their intended use; advertising these products and their intended
10 use through its own and third-party websites (for example,
11 <https://www.iportproducts.com/phone>) and providing instructions on how to use
12 these products (for example, [https://images.salsify.com/image/upload/s--
13 Dkbx2Z9z--/zb95c64hk6iw30fxwqtq](https://images.salsify.com/image/upload/s--Dkbx2Z9z--/zb95c64hk6iw30fxwqtq)).

14 56. Upon information and belief, iPort has contributed to and continues to
15 contribute to the infringement of one or more claims of the '458 patent, including
16 but not limited to claim 12, by, without authority, selling and/or offering to sell
17 within the United States, importing, and/or supplying components of systems that
18 comprise the patented invention, including but not limited to protective covers and
19 docking cradles. These components supplied by iPort are key components to the
20 docking systems claimed in the '458 patent. When, for example, a protective cover
21 is used with a docking cradle, the claimed docking systems are formed, thereby
22 infringing, either literally or under the doctrine of equivalents, one or more claims
23 of the '458 patent. Upon information and belief, iPort supplied and continues to
24 supply these components, with the knowledge of the '458 patent and with the
25 knowledge that these components constitute material parts of the inventions
26 claimed in the '458 patent. Further, iPort knows that these components are
27 especially made and/or especially adapted for use as claimed in the '458 patent.
28 Moreover, iPort knows that there is no substantial non-infringing use of these

1 components.

2 57. As a direct and proximate consequence of iPort’s infringement of the
3 ’458 patent, NPI has suffered irreparable harm, and NPI will continue to suffer
4 irreparable harm in the future unless iPort is enjoined from infringing the ’458
5 patent.

6 58. iPort has had actual knowledge of the ’458 patent and its infringement
7 thereof since at least January 17, 2024, when NPI notified iPort that the
8 manufacture, sale, offering for sale, importation, and/or use of these products
9 infringes the ’458 patent.

10 59. Upon information and belief, iPort’s continued infringement of the
11 ’458 patent is willful.

12 **COUNT III**
13 **INFRINGEMENT OF UNITED STATES PATENT NO. 12,132,511**

14 60. NPI realleges and incorporates by reference the allegations in
15 paragraphs 1–59 above.

16 61. iPort has directly infringed and continues to directly infringe at least
17 claim 9 of the ’511 patent by making, using, offering to sell, and selling within the
18 United States and/or importing into the United States powered docking systems for
19 and used with portable electronic devices, including but not limited to iPort’s
20 Connect Phone line of products.

21 62. Inspection of the Connect Phone line of products demonstrates that
22 they meet each and every element of claim 9 of the ’511 patent, either literally or by
23 the doctrine of equivalents.

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1 63. The Connect Phone line of products comprise a protective arrangement
 2 comprising a removable cover comprising a panel and a skirt that meets edges of
 3 the panel, the removable cover comprising an exterior surface and an adapter
 4 opening in the exterior surface wherein the panel and the skirt form an interior
 5 cavity therebetween with the skirt forming a mouth opening that communicates
 6 with the interior cavity wherein the interior cavity is configured and arranged to
 7 receive an electronic device:



19 64. The adapter of the Connect Phone products further comprises a
 20 plurality of first contacts accessible within the interior cavity of the removable
 21 cover in an arrangement for mating with one or more device contacts of the
 22 electronic device and a contactor configured for exposure through the adapter
 23 opening in the exterior surface of the removable cover, the contactor comprising a
 24 lateral surface opposite the first contacts and a plurality of second contacts arranged
 25 on the lateral surface and configured for exposure through the adapter opening of
 26 the removable cover, wherein the second contacts are electrically coupled to the
 27 first contacts, and wherein the panel extends perpendicularly to the lateral surface
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1 of the contactor.

2 65. Upon information and belief, iPort has induced and continues to
3 induce infringement of one or more claims of the '511 patent, including but not
4 limited to claim 9, by inducing its customers and other third parties to use without
5 authorization the docking systems claimed in the '511 patent. The use, without
6 authorization, of the docking system constitutes infringement, literally or under the
7 doctrine of equivalents, of one or more claims of the '511 patent by such customers
8 or third parties. iPort's acts of inducement include: providing its customers with
9 the claimed docking systems and components thereof and intending customers to
10 use according to their intended use; advertising these products and their intended
11 use through its own and third-party websites (for example,
12 <https://www.iportproducts.com/phone>) and providing instructions on how to use
13 these products (for example, [https://images.salsify.com/image/upload/s--
14 Dkbx2Z9z--/zb95c64hk6iw30fxwqtq](https://images.salsify.com/image/upload/s--Dkbx2Z9z--/zb95c64hk6iw30fxwqtq)).

15 66. Upon information and belief, iPort has contributed to and continues to
16 contribute to the infringement of one or more claims of the '511 patent, including
17 but not limited to claim 9, by, without authority, selling and/or offering to sell
18 within the United States, importing, and/or supplying components of systems that
19 comprise the patented invention, including but not limited to protective covers and
20 docking cradles. These components supplied by iPort are key components to the
21 docking systems claimed in the '511 patent. When, for example, a protective cover
22 is used with a docking cradle, the claimed docking systems are formed, thereby
23 infringing, either literally or under the doctrine of equivalents, one or more claims
24 of the '511 patent. Upon information and belief, iPort supplied and continues to
25 supply these components, with the knowledge of the '511 patent and with the
26 knowledge that these components constitute material parts of the inventions
27 claimed in the '511 patent. Further, iPort knows that these components are
28 especially made and/or especially adapted for use as claimed in the '511 patent.

1 Moreover, iPort knows that there is no substantial non-infringing use of these
2 components.

3 67. As a direct and proximate consequence of iPort’s infringement of the
4 ’511 patent, NPI has suffered irreparable harm, and NPI will continue to suffer
5 irreparable harm in the future unless iPort is enjoined from infringing the ’511
6 patent.

7 68. iPort has had actual knowledge of the ’511 patent and its infringement
8 thereof since at least November 1, 2024, when NPI notified iPort that the
9 manufacture, sale, offering for sale, importation, and/or use of these products
10 infringes the ’511 patent.

11 69. Upon information and belief, iPort’s continued infringement of the
12 ’511 patent is willful.

13 **COUNT IV**
14 **INFRINGEMENT OF UNITED STATES PATENT NO. 12,143,140**

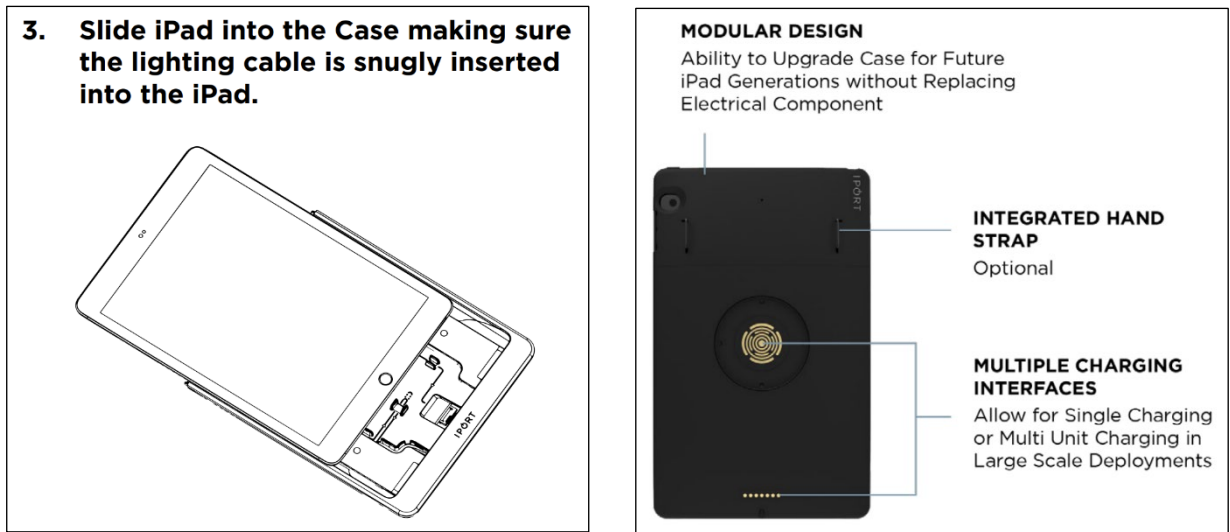
15 70. NPI realleges and incorporates by reference the allegations in
16 paragraphs 1–69 above.

17 71. iPort has directly infringed and continues to directly infringe at least
18 claim 1 of the ’140 patent by making, using, offering to sell, and selling within the
19 United States and/or importing into the United States powered docking systems for
20 and used with portable electronic devices, including but not limited to iPort’s
21 Connect Pro (Tablet) line of products.

22 72. Inspection of the Connect Pro line of products demonstrates that they
23 meet each and every element of claim 1 of the ’140 patent, either literally or by the
24 doctrine of equivalents.

25 73. The Connect Pro products comprise a protective case comprising a
26 panel comprising an exterior surface, and a skirt surrounding the panel, wherein the
27 panel and skirt define an interior cavity to receive the portable electronic device,
28 wherein the panel is configured and arranged to cover a back face of the portable

1 electronic device and the skirt is configured and arranged to at least partially cover
 2 a plurality of side faces of the portable electronic device and extend over a
 3 peripheral edge of a front face of the portable electronic device to secure the
 4 portable electronic device within the interior cavity:



74. As shown above, the Connect Pro products comprise a male plug comprising at least four first contacts, the male plug extending from the skirt into the interior cavity of the protective case and configured for mating the at least four first contacts with contacts of a female socket of the portable electronic device to facilitate transfer of power to or from the portable electronic device and to facilitate transfer of data to or from the portable electronic device.

75. The Connect Pro products further comprise at least four second contacts disposed on the exterior surface of the panel and configured to be positioned over the back face of the portable electronic device on a portion of the exterior surface of the panel that is parallel to the back face of the portable electronic device when the portable electronic device is received in the interior cavity, wherein the at least four second contacts are electrically coupled to the at least four first contacts.

76. Additionally, Connect Pro products comprise a female nest disposed

1 on the exterior surface of the panel and configured to receive a male nesting
2 appendage, wherein the female nest defines one or more first rotational control
3 features formed as indents or intrusions into the female nest.

4 77. Upon information and belief, iPort has induced and continues to
5 induce infringement of one or more claims of the '140 patent, including but not
6 limited to claim 1, by inducing its customers and other third parties to use without
7 authorization the docking systems claimed in the '140 patent. The use, without
8 authorization, of the docking system constitutes infringement, literally or under the
9 doctrine of equivalents, of one or more claims of the '140 patent by such customers
10 or third parties. iPort's acts of inducement include: providing its customers with
11 the claimed docking systems and components thereof and intending customers to
12 use according to their intended use; advertising these products and their intended
13 use through its own and third-party websites (for example,
14 <https://www.iportproducts.com/Product/cpcase>); and providing instructions on how
15 to use these products (for example, [https://images.salsify.com/image/upload/s--
16 IilBc-wI--/gr3dj2isvln2esklzvak.pdf](https://images.salsify.com/image/upload/s--IilBc-wI--/gr3dj2isvln2esklzvak.pdf)).

17 78. Upon information and belief, iPort has contributed to and continues to
18 contribute to the infringement of one or more claims of the '140 patent, including
19 but not limited to claim 1, by, without authority, selling and/or offering to sell
20 within the United States, importing, and/or supplying components of systems that
21 comprise the patented invention, including but not limited to protective covers and
22 docking cradles. These components supplied by iPort are key components to the
23 docking systems claimed in the '140 patent. When, for example, a protective cover
24 is used with a docking cradle, the claimed docking systems are formed, thereby
25 infringing, either literally or under the doctrine of equivalents, one or more claims
26 of the '140 patent. Upon information and belief, iPort supplied and continues to
27 supply these components, with the knowledge of the '140 patent and with the
28 knowledge that these components constitute material parts of the inventions

1 claimed in the '140 patent. Further, iPort knows that these components are
2 especially made and/or especially adapted for use as claimed in the '140 patent.
3 Moreover, iPort knows that there is no substantial non-infringing use of these
4 components.

5 79. As a direct and proximate consequence of iPort's infringement of the
6 '140 patent, NPI has suffered irreparable harm, and NPI will continue to suffer
7 irreparable harm in the future unless iPort is enjoined from infringing the '140
8 patent.

9 80. iPort has had actual knowledge of the '140 patent and its infringement
10 thereof since at least November 1, 2024, when NPI notified iPort that the
11 manufacture, sale, offering for sale, importation, and/or use of these products
12 infringes the '140 patent.

13 81. Upon information and belief, iPort's continued infringement of the
14 '140 patent is willful.

15 **COUNT V**
16 **INFRINGEMENT OF UNITED STATES PATENT NO. 12,143,141**

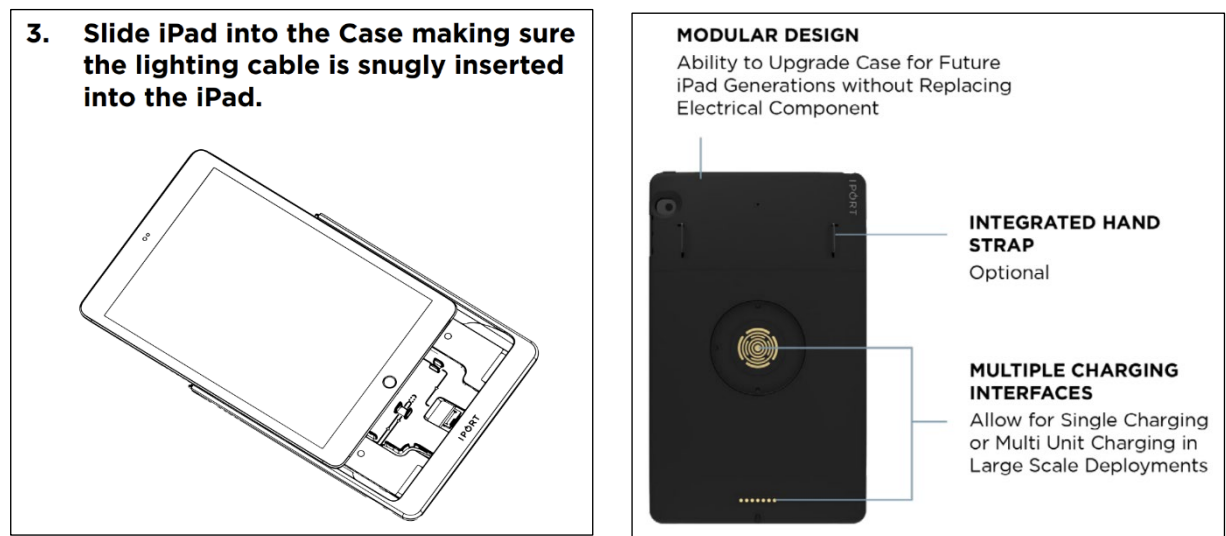
17 82. NPI realleges and incorporates by reference the allegations in
18 paragraphs 1–81 above.

19 83. iPort has directly infringed and continues to directly infringe at least
20 claim 1 of the '141 patent by making, using, offering to sell, and selling within the
21 United States and/or importing into the United States powered docking systems for
22 and used with portable electronic devices, including but not limited to iPort's
23 Connect Pro line of products.

24 84. The Connect Pro line of products meet each and every element of
25 claim 1 of the '141 patent, either literally or by the doctrine of equivalents.

26 85. The Connect Pro products comprise protective case comprising a
27 center panel and a side skirt surrounding the center panel, the center panel
28 comprising an exterior surface, wherein the center panel and the side skirt form an

1 interior cavity therebetween, wherein the interior cavity is configured and arranged
 2 to receive the portable electronic device, wherein the protective case is configured
 3 and arranged to cover a back face of the portable electronic device with the center
 4 panel, cover at least a portion of each side face of the portable electronic device
 5 with the side skirt, and to extend around a peripheral edge of a front face of the
 6 portable electronic device to secure the portable electronic device within the
 7 protective case and wherein the exterior surface opposites to the interior cavity:



86. As shown above, the Connect Pro products comprise a male plug extending into the interior cavity of the protective case and comprising a plurality of first contacts, wherein the male plug is positioned in the protective case for mating with a female socket of the portable electronic device when received in the protective case.

87. Additionally, the Connect Pro products comprise a male plug extending into the interior cavity of the protective case and comprising a plurality of first contacts, wherein the male plug is positioned in the protective case for mating with a female socket of the portable electronic device when received in the protective case.

88. The Connect Pro products further comprise a plurality of second

1 contacts arrayed on a portion of the exterior surface of the center panel that is
2 parallel to the back face of the portable electronic device, and positioned over the
3 back face of the portable electronic device, when the portable electronic device is
4 received in the interior cavity, wherein the plurality of second contacts comprises at
5 least three circular contacts, at least three annular contacts, or at least three contacts
6 spaced laterally along the exterior surface of the center panel, wherein at least one
7 of the second contacts is electrically coupled to at least one of the first contacts.

8 89. And the Connect Pro products further comprise wherein the second
9 contacts that are disposed on a surface that is recessed relative to an adjacent
10 portion of the exterior surface of the center panel.

11 90. Upon information and belief, iPort has induced and continues to
12 induce infringement of one or more claims of the '141 patent, including but not
13 limited to claim 1, by inducing its customers and other third parties to use without
14 authorization the docking systems claimed in the '141 patent. The use, without
15 authorization, of the docking system constitutes infringement, literally or under the
16 doctrine of equivalents, of one or more claims of the '141 patent by such customers
17 or third parties. iPort's acts of inducement include: providing its customers with
18 the claimed docking systems and components thereof and intending customers to
19 use according to their intended use; advertising these products and their intended
20 use through its own and third-party websites (for example,
21 <https://www.iportproducts.com/Product/cpcase>); and providing instructions on how
22 to use these products (for example, [https://images.salsify.com/image/upload/s--
23 iilBc-wI--/gr3dj2isvln2esklzvak.pdf](https://images.salsify.com/image/upload/s--iilBc-wI--/gr3dj2isvln2esklzvak.pdf)).

24 91. Upon information and belief, iPort has contributed to and continues to
25 contribute to the infringement of one or more claims of the '141 patent, including
26 but not limited to claim 1, by, without authority, selling and/or offering to sell
27 within the United States, importing, and/or supplying components of systems that
28 comprise the patented invention, including but not limited to protective covers and

1 docking cradles. These components supplied by iPort are key components to the
2 docking systems claimed in the '141 patent. When, for example, a protective cover
3 is used with a docking cradle, the claimed docking systems are formed, thereby
4 infringing, either literally or under the doctrine of equivalents, one or more claims
5 of the '141 patent. Upon information and belief, iPort supplied and continues to
6 supply these components, with the knowledge of the '141 patent and with the
7 knowledge that these components constitute material parts of the inventions
8 claimed in the '141 patent. Further, iPort knows that these components are
9 especially made and/or especially adapted for use as claimed in the '141 patent.
10 Moreover, iPort knows that there is no substantial non-infringing use of these
11 components.

12 92. As a direct and proximate consequence of iPort's infringement of the
13 '141 patent, NPI has suffered irreparable harm, and NPI will continue to suffer
14 irreparable harm in the future unless iPort is enjoined from infringing the '141
15 patent.

16 93. iPort has had actual knowledge of the '141 patent and its infringement
17 thereof since at least November 1, 2024, when NPI notified iPort that the
18 manufacture, sale, offering for sale, importation, and/or use of these products
19 infringes the '141 patent.

20 94. Upon information and belief, iPort's continued infringement of the
21 '141 patent is willful.

22 **COUNT VI**
23 **INFRINGEMENT OF UNITED STATES PATENT NO. 12,143,142**

24 95. NPI realleges and incorporates by reference the allegations in
25 paragraphs 1–94 above.

26 96. iPort has directly infringed and continues to directly infringe at least
27 claim 1 of the '142 patent by making, using, offering to sell, and selling within the
28 United States and/or importing into the United States powered docking systems for

1 and used with portable electronic devices, including but not limited to iPort's
2 Connect Phone line of products with multi-device docking stations.

3 97. Inspection of the Connect Phone products demonstrates that they meet
4 each and every element of claim 1 of the '142 patent, either literally or by the
5 doctrine of equivalents.

6 98. iPort's Connect Phone multi-device docking station product comprises
7 the docking system of claim 1:



20
21 99. As shown above, the Connect Phone products comprise at least one
22 protective case for a portable electronic device, each of the at least one protective
23 case comprising a panel, a skirt surrounding the panel, and wherein the panel and
24 skirt define an interior cavity to receive the portable electronic device, wherein the
25 panel is configured and arranged to cover a back face of the portable electronic
26 device and the skirt is configured and arranged to at least partially cover a plurality
27 of side faces of the portable electronic device and extend over a peripheral edge of a
28 front face of the portable electronic device to secure the portable electronic device

1 within the interior cavity.

2 100. The Connect Phone products further comprise a male plug comprising
3 at least three first contacts, the male plug extending from the skirt into the interior
4 cavity of the protective case and configured for mating the at least three first
5 contacts with contacts of a female socket of the portable electronic device to
6 facilitate transfer of power to or from the portable electronic device and a contactor
7 comprising a contactor surface and at least three second contacts disposed on the
8 contactor surface, wherein the at least three second contacts are electrically coupled
9 to the at least three first contacts.

10 101. Additionally, the Connect Phone products include a multi-device
11 docking station comprising a base and a plurality of docking connectors disposed
12 on or in the base, each docking connector configured to mate with the contactor
13 surface of a one of the at least one protective case, each docking connector
14 comprising at least three docking contacts arranged to electrically connect with the
15 at least three second contacts of the one of the at least one protective case, wherein
16 the at least three docking contacts are spring-loaded pogo pins.

17 102. Further, the multi-device docking station of the Connect Phone
18 products comprises a plurality of support surfaces extending away from the base,
19 wherein each of the support surfaces is configured for positioning the portable
20 electronic device against the support surface when the contactor surface of the one
21 of the at least one protective case is mated to a one of the docking connectors
22 proximate the support surface.

23 103. Upon information and belief, iPort has induced and continues to
24 induce infringement of one or more claims of the '142 patent, including but not
25 limited to claim 1, by inducing its customers and other third parties to use without
26 authorization the docking systems claimed in the '142 patent. The use, without
27 authorization, of the docking system constitutes infringement, literally or under the
28 doctrine of equivalents, of one or more claims of the '142 patent by such customers

1 or third parties. iPort's acts of inducement include: providing its customers with
2 the claimed docking systems and components thereof and intending customers to
3 use according to their intended use; advertising these products and their intended
4 use through its own and third-party websites and providing instructions on how to
5 use these products (for example, [https://images.salsify.com/image/upload/s--
6 Dkbx2Z9z--/zb95c64hk6iw30fxwqtq](https://images.salsify.com/image/upload/s--Dkbx2Z9z--/zb95c64hk6iw30fxwqtq)).

7 104. Upon information and belief, iPort has contributed to and continues to
8 contribute to the infringement of one or more claims of the '142 patent, including
9 but not limited to claim 1, by, without authority, selling and/or offering to sell
10 within the United States, importing, and/or supplying components of systems that
11 comprise the patented invention, including but not limited to protective covers and
12 docking cradles. These components supplied by iPort are key components to the
13 docking systems claimed in the '142 patent. When, for example, a protective cover
14 is used with a docking cradle, the claimed docking systems are formed, thereby
15 infringing, either literally or under the doctrine of equivalents, one or more claims
16 of the '142 patent. Upon information and belief, iPort supplied and continues to
17 supply these components, with the knowledge of the '142 patent and with the
18 knowledge that these components constitute material parts of the inventions
19 claimed in the '142 patent. Further, iPort knows that these components are
20 especially made and/or especially adapted for use as claimed in the '142 patent.
21 Moreover, iPort knows that there is no substantial non-infringing use of these
22 components.

23 105. As a direct and proximate consequence of iPort's infringement of the
24 '142 patent, NPI has suffered irreparable harm, and NPI will continue to suffer
25 irreparable harm in the future unless iPort is enjoined from infringing the '142
26 patent.

27 106. iPort has had actual knowledge of the '142 patent and its infringement
28 thereof since at least November 1, 2024, when NPI notified iPort that the

1 manufacture, sale, offering for sale, importation, and/or use of these products
2 infringes the '142 patent.

3 107. Upon information and belief, iPort's continued infringement of the
4 '142 patent is willful.

5 **PRAYER FOR RELIEF**

6 WHEREFORE, NPI prays for the following relief:

7 a. A judgment that Dana Innovations, Inc. d/b/a Sonance and iPort has
8 infringed the '275, '458 '511, '140, '141, and '142 patents;

9 b. An order preliminarily and permanently enjoining and restraining
10 Dana Innovations, Inc. d/b/a Sonance and iPort, its officers, directors, agents,
11 servants, employees, licensees, attorneys, and all other persons acting under or
12 through them, directly or indirectly, from infringing the '275, '458, '511, '140,
13 '141, and '142 patents;

14 c. A judgment and order requiring that Dana Innovations, Inc. d/b/a
15 Sonance and iPort pay damages under 35 U.S.C. § 284, with prejudgment and post-
16 judgment interest;

17 d. A judgment that Dana Innovations, Inc. d/b/a Sonance and iPort's
18 infringement has been willful, and that damages are increased three-fold;

19 e. A judgment and order directing Dana Innovations, Inc. d/b/a Sonance
20 and iPort to pay the costs of this action, including all disbursements and attorney
21 fees as provided by 35 U.S.C. § 285, with prejudgment interest; and

22 f. Such other and further relief as the Court may deem just and equitable.

23 **DEMAND FOR JURY TRIAL**

24 NPI hereby demands a trial by jury of all issues so triable.
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Dated: November 15, 2024

Respectfully submitted,
FENWICK & WEST LLP

By: /s/ Jonathan G. Tamimi
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Attorneys for Plaintiff
NATIONAL PRODUCTS INC.

FENWICK & WEST LLP
ATTORNEYS AT LAW
MOUNTAIN VIEW