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10 IN 2 DEVELOPMENTS LLC

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 IN 2 DEVELOPMENTS LLC,

14 *Plaintiff,*

15 v.

16 GLOBE ELECTRIC COMPANY
17 (U.S.A.), INC.,

18 *Defendant.*

Case No. 5:25-cv-209

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

19
20 Plaintiff IN 2 Developments LLC (“IN 2” or “Plaintiff”) files this
21 Complaint against Globe Electric Company (U.S.A.), Inc., (“Globe Electric” or
22 Defendant”) for patent infringement of United States Patent Nos. 9,702,510 and
23 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.* Accordingly, this Court has subject matter jurisdiction under at least 28
27 U.S.C. §§ 1331 and 1338(a).

PARTIES

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2 2. Plaintiff IN 2 is a limited liability company organized under the laws of
3 the State of Minnesota with its principal place of business in Crosby, Minnesota.

4 3. Plaintiff’s principal, Mr. Deloren E. Anderson, is the CEO/Owner of
5 IN 2, which owns the patents-in-suit.

6 4. On information and belief, Defendant Globe Electric is a corporation
7 organized and existing under the laws of the State of Delaware with a principal place
8 of business at 2264 East 6th Street, San Bernadino, California 92410.

9 5. Globe Electric is a multi-national enterprise that designs, develops,
10 manufactures, and sells lighting, bulbs, LED, and electrical products as well as other
11 energy-related consumer goods.

12 6. This Court has personal jurisdiction over Globe Electric because it has
13 a principal place of business in San Bernardino, making its contacts with the State of
14 California “so continuous and systematic” that it can be said to be “at home” in
15 this State and this judicial district.

16 7. Alternatively, this Court has personal jurisdiction over Globe Electric
17 under California’s long-arm statute because it has sufficient contacts with the State
18 such that the exercise of jurisdiction would be reasonable, and the claims in the
19 action arise out of those contacts.

20 8. Globe Electric’s contacts with California include, without limitation
21 (a) a substantial operational presence within California and this judicial district,
22 including many employees working at its San Bernardino location, and (b)
23 conducting and soliciting business in the State, including selling and distributing
24 goods—including without limitation the accused products—to residents of the
25 State and deriving substantial revenue from such sales and distribution.

26 9. In addition, on information and belief, Globe Electric has committed,
27 and continues to commit, acts of infringement in California. On information and
28 belief, Globe Electric makes, offers to sell, or sells a variety of LED lightbulbs in this

1 State, including without limitation its 7.5W (60W Equivalent) Vintage Edison E26
2 LED bulbs and other bulbs that rely on, use, or employ the same or similar design
3 and construction (collectively and individually, as “Globe Electric Products”),
4 which infringe one or more claims of each of the Patents-in-Suit.

5 10. The above-listed contacts are the result of deliberate and intentional
6 conduct, purposely directed toward California, on the part of Globe Electric.
7 Plaintiff’s claims against Globe Electric arise from these California contacts.

8 11. Given these extensive and purposeful contacts with New York,
9 exercising personal jurisdiction over Globe Electric would be reasonable and
10 consistent with due process.

11 12. Venue is proper in this judicial district under at least 28 U.S.C. § 1391
12 or § 1400(b) because Defendant has a regular and established place of business
13 located within this district, or because Defendant has committed acts of
14 infringement by offering to sell or selling the infringing Globe Electric Products
15 within this judicial district, or both.

16 **THE ASSERTED PATENTS**

17 ***United States Patent Nos. 9,702,510 and 9,995,436***

18 13. On July 11, 2017, the United States Patent and Trademark Office
19 (“USPTO”) duly and legally issued United States Patent No. 9,702,510 (“the ’510
20 patent”) entitled “LED LIGHT BULB” to inventor Deloren E. Anderson.

21 14. The ’510 patent is presumed valid under 35 U.S.C. § 282.

22 15. IN 2 owns all rights, title, and interest in the ’510 patent.

23 16. IN 2 has not granted Globe Electric a license to the rights under the
24 ’510 patent.

25 17. On Jun 12, 2018, the United States Patent and Trademark Office
26 (“USPTO”) duly and legally issued United States Patent no. 9,995,436 (“the ’436
27 patent”) entitled “LED LIGHT BULB” to inventor Deloren E. Anderson.

28 18. The ’436 patent is presumed valid under 35 U.S.C. § 282.

1 19. IN 2 owns all rights, title, and interest in the '436 patent.

2 20. IN 2 has not granted Globe Electric a license to the rights under the
3 '436 patent.

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

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

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

16 24. The specification of the '510 and '436 patents and the invention(s)
17 claimed in the patent solve, among other things, various technological problems
18 inherent in integrating LED technology into traditional bulb designs by creating a
19 light bulb that (1) includes an Edison style base, (2) features LED circuitry coupled
20 to the base, (3) employs a conductive structure with proximal and distal contacts,
21 (4) incorporates an elongated filament that extends into the bulb and is encased by
22 it, (5) integrates an LED channel within the filament, and (6) contains an inert gas
23 within the bulb.

24 **CLAIMS FOR RELIEF**

25 **Count I - Infringement of the '510 Patent by Globe Electric**

26 25. IN 2 realleges and incorporates by reference, as if fully set forth here,
27 the allegations of the previous paragraphs above.

28

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

5 27. On information and belief, and as shown below, the Globe Electric
6 Products exhibit a light bulb comprising an Edison style base.



17 28. On information and belief, and as shown below, the Globe Electric
18 Products exhibit a light bulb comprising light emitting diode circuitry coupled to the
19 base.



1 29. On information and belief, and as shown below, the Globe Electric
2 Products exhibit a light bulb comprising a conductive structure including a proximal
3 contact that is proximate the base and a first distal contact that is distal from the
4 base.



15 30. On information and belief, and as shown below, the Globe Electric
16 Products exhibit a light bulb comprising a bulb sealed about the base and extending
17 above the base.



1 31. On information and belief, and as shown below, the Globe Electric
2 Products exhibit a light bulb comprising a substantially cylindrical elongated
3 filament end by the first proximate contact [...]



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



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



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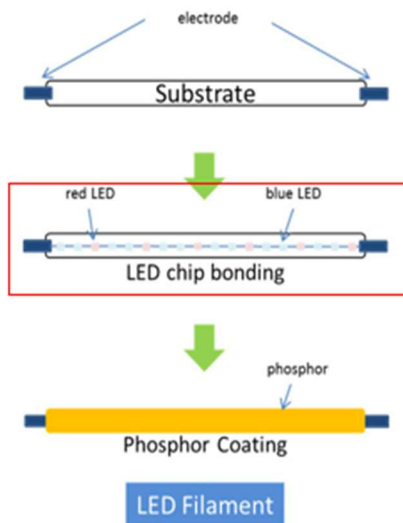
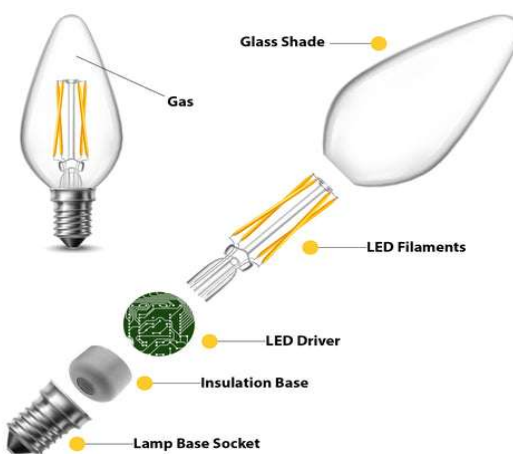


Figure 1. Filament manufacturing process

See e.g.,

https://www.ledinside.com/knowledge/2015/2/the_next_generation_of_led_filament_bulbs.

33. On information and belief, and as shown above and below, the Globe Electric Products exhibit a light bulb comprising an inert gas disposed within the bulb.



See e.g., <https://www.candexlighting.com/blogs/aboutlights/back-to-the-future-with-led-filament-bulbs#:~:text=LED%20filaments%20are%20made%20up,color%20emitted%20by%20the%20bulb>.

1 34. On information and belief, Globe Electric directly infringes at least
2 claim 1 of the '510 patent in violation of 35 U.S.C. § 271(a) by making, using,
3 selling, or offering to sell the infringing Globe Electric Products.

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

6 **Count II - Infringement of the '436 Patent by Globe Electric**

7 36. All prior paragraphs are incorporated into this claim.

8 37. On information and belief, Globe Electric infringes (literally and/ or
9 under the doctrine of equivalents) at least claim 1 of the '436 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 38. On information and belief, and as shown below, the Globe Electric
13 Products exhibit a light bulb comprising an Edison style base.



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



40. On information and belief, and as shown below, the Globe Electric Products exhibit a light bulb comprising a conductive structure including a proximal contact that is proximate the base and a first distal contact that is distal from the base.



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1 41. On information and belief, and as shown below, the Globe Electric
2 Products exhibit a light bulb comprising a bulb sealed about the base and extending
3 above the base.



16 42. On information and belief, and as shown below, the Globe Electric
17 Products exhibit a light bulb comprising an elongated filament [...]



1 [...] supported on a first proximate filament end by the first proximate contact and
2 supported on a first distal filament end by the first distal contact, the filament
3 extending from the base into the bulb above the base [...]



15 [...] wherein the bulb entirely encases the elongated filament.



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

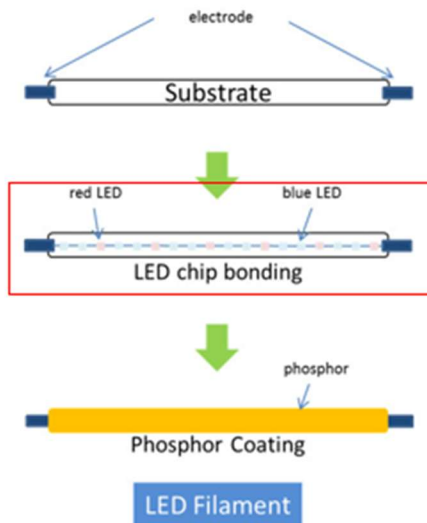
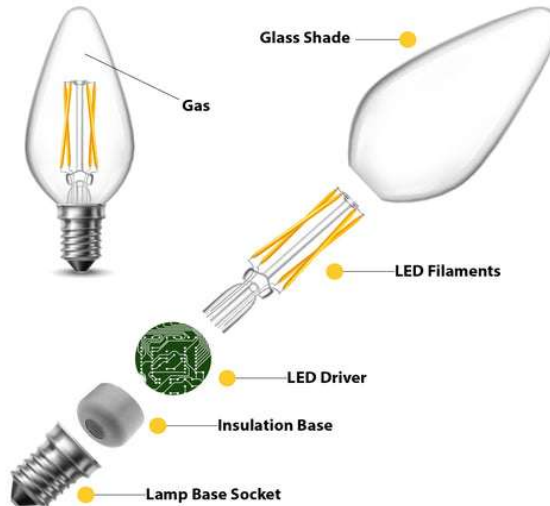


Figure 1. Filament manufacturing process

26 *See e.g.,*

27 https://www.ledinside.com/knowledge/2015/2/the_next_generation_of_led_filament_bulbs.

1 44. On information and belief, and as shown above and below, the Globe
2 Electric Products exhibit a light bulb comprising an inert gas disposed within the
3 bulb.



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13 *See e.g.*, [https://www.candexlighting.com/blogs/aboutlights/back-to-the-future-with-led-filament-](https://www.candexlighting.com/blogs/aboutlights/back-to-the-future-with-led-filament-bulbs#:~:text=LED%20filaments%20are%20made%20up,color%20emitted%20by%20the%20bulb.)
14 [bulbs#:~:text=LED%20filaments%20are%20made%20up,color%20emitted%20by%20](https://www.candexlighting.com/blogs/aboutlights/back-to-the-future-with-led-filament-bulbs#:~:text=LED%20filaments%20are%20made%20up,color%20emitted%20by%20the%20bulb.)
15 [the%20bulb.](https://www.candexlighting.com/blogs/aboutlights/back-to-the-future-with-led-filament-bulbs#:~:text=LED%20filaments%20are%20made%20up,color%20emitted%20by%20the%20bulb.)

17 45. On information and belief, Globe Electric directly infringes at least
18 claim 1 of the '436 patent in violation of 35 U.S.C. § 271(a) by making, using,
19 selling, or offering to sell the infringing Globe Electric Products.

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

22 **PRAYER FOR RELIEF**

23 IN 2 respectfully requests this Court to enter judgment in IN 2's favor
24 against Globe Electric as follows:

- 25 A. finding that Globe Electric has infringed one or more claims of the '510
26 patent under 35 U.S.C. § 271(a);
27 B. finding that Globe Electric has infringed one or more claims of the '436
28 patent under 35 U.S.C. § 271(a);

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- C. awarding IN 2 damages under 35 U.S.C. § 284, or otherwise permitted by law, including supplemental damages for any continued post-verdict infringement;
- D. awarding IN 2 pre-judgment and post-judgment interest on the damages award and costs;
- E. awarding the costs of this action (including all disbursements) and attorney fees pursuant to 35 U.S.C. § 285, or as otherwise permitted by the law; and,
- F. awarding such other costs and further relief that the Court determines to be just and equitable.

JURY DEMAND

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

Dated: January 25, 2025 **PERKOWSKI LEGAL, PC**
DAIGNAULT IYER LLP

By: /s/ Peter Perkowski
Peter E. Perkowski
Attorneys for Plaintiff
IN 2 DEVELOPMENTS LLC