

1 LAW OFFICES OF MARC LIBARLE

2 Marc Libarle (CABN: 071678)

3 1388 Sutter St, Ste 910

4 San Francisco, CA 94109

5 Phone: (415) 928-2400

6 Email: ml7006@gmail.com

7 HALLER LAW PLLC

8 Timothy J. Haller (*Pro Hac Vice Pending*)

9 230 E Delaware Pl, Ste 5E

10 Chicago, IL 60611

11 Phone: (630) 336-4283

12 Email: haller@haller-iplaw.com

13 *Attorneys for Plaintiff,*

14 *BelAir Electronics, Inc.*

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**
17 **WESTERN DIVISION**

18 **BELAIR ELECTRONICS, INC.,**

19 **Plaintiff,**

20 **v.**

21 **DORIA INTERNATIONAL INC (dba**
22 **DORIA GROUP, dba X-DORIA, dba**
23 **DEFENSE BY X-DORIA, dba RAP TIC,**
24 **dba NOÉMIE, dba FERRON, dba**
25 **MANTLE),**

26 **Defendant.**

27 **Case No. 2:25-cv-1116**

28 **COMPLAINT FOR PATENT**
INFRINGEMENT

29 Plaintiff BelAir Electronics, Inc. complains of Defendant Doria International Inc
30 (dba Doria Group, dba X-Doria, dba Defense by X-Doria, dba Raptic, dba Noémie)
31 (“Doria” or “Defendant”) as follows, all upon Plaintiff’s best information and belief:

32 COMPLAINT FOR PATENT INFRINGEMENT

1 **NATURE OF LAWSUIT**

2 1. This is a claim for patent infringement arising under the patent laws of the
3 United States, Title 35 of the United States Code.

4 **THE PARTIES**

5 2. Plaintiff BelAir Electronics, Inc. (“BelAir” or “Plaintiff”) is an Illinois
6 corporation with its principal place of business at 5723 Antler Lane, Westmont, Illinois
7 60559.

8 3. BelAir is the named assignee of, owns all right, title and interest in, and has
9 standing to sue for infringement of United States Patent No. 7,941,195, entitled “Protective
10 Mask of Mobile Phone,” which issued on May 10, 2011 (the “195 Patent”) (a true and
11 correct copy is attached as Exhibit A) and United States Patent No. 10,097,676, entitled
12 “Protective Mask of Mobile Phone,” which issued on October 9, 2018 (the “676 Patent”)
13 (a true and correct copy is attached as Exhibit B) (collectively, the “Asserted Patents”).

14 4. BelAir has the exclusive right to license, enforce and collect all past damages
15 for infringement of the Asserted Patents for the period starting six years prior to the filing
16 date of this suit (February 10, 2019) through the expirations of the Asserted Patents. BelAir
17 also has standing to sue for infringement of the Asserted Patents.

18 5. Upon information and belief, Defendant Doria International Inc (dba Doria
19 Group, dba X-Doria, dba Defense by X-Doria, dba Raptic, dba Noémie) is a domestic
20 California corporation with a registered principal address at 12424 Wilshire Boulevard,
21 Suite 1120, Los Angeles, California 90025.

22 6. In furtherance of Plaintiff’s review and analysis prior to filing this action,
23 Plaintiff studied Defendant’s publicly-available product literature and, among other things,
24 purchased a “RAPTIC Clear Case Compatible with iPhone 12 Pro Max Case, Anti-Yellow
25 Slim Cover, Shock Absorbing Rubber, Scratch Resistant Protective Case, Fits iPhone 12
26 Pro Max, Blue” and an “X-Doria Raptic Shield, Samsung Galaxy S20 (Formerly Shield) -
27 Military Grade Drop Tested, Anodized Aluminum, TPU, and Polycarbonate Protective
28 Case, Samsung Galaxy S20, Red” from Defendant’s Amazon storefront and a “Noémie

1 Apple iPhone 13 Pro Max/iPhone 12 Pro Max Wallet & Crossbody Strap Case” from
2 Target.com for assessment as representative of the products identified in Exhibit C.

3 7. Defendant primarily advertises and sells Accused Products at
4 <https://rapticstrong.com/> and related urls in the rapticstrong.com domain;
5 [https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX](https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX0DER)
6 [0DER, https://www.amazon.com/stores/X-Doria/X-Doria/page/EC7F7157-B87B-43EF-](https://www.amazon.com/stores/X-Doria/X-Doria/page/EC7F7157-B87B-43EF-A45B-F474E5F17F45)
7 [A45B-F474E5F17F45, and https://www.amazon.com/stores/Raptic/page/7B2A3DDC-](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629)
8 [C4FE-4018-A65E-F2230DBCA629](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629) and related “X-Doria” and “Raptic” product pages
9 accessed through Amazon.com’s website;
10 [https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARap](https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARaptic)
11 [tic](https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARaptic) and related “X-Doria” and “Raptic” product pages accessed through Walmart.com’s
12 website; [https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-](https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0)
13 [55n9sZq643leqcob0](https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0) and related “Raptic” and “Noémie” product pages accessed through
14 Target.com’s website; and
15 [https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
16 [8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_f](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
17 [acet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=cat](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
18 [egoryid%24abcat0811006&type=page&usc=All%20Categories](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories) and related “Raptic” and
19 “Noémie” product pages accessed through BestBuy.com’s website.

20 8. Defendant offers for sale and sells the Accused Products (as further identified
21 below) for mobile devices throughout the United States and this Judicial District.

22 JURISDICTION AND VENUE

23 9. BelAir’s claims for patent infringement against Defendant arise under the
24 patent laws of the United States including 35 U.S.C. §§ 271 and 281. Consequently, this
25 Court has original and exclusive subject matter jurisdiction over this Complaint pursuant
26 to 28 U.S.C. §§ 1331 and 1338(a).

27 10. Defendant owns, operates, and conducts business in the state of California and
28 directs advertisements at residents of California – which are covered by claims of the

1 Asserted Patents – and throughout the United States including California and this Judicial
2 District.

3 11. Doria International Inc (dba Doria Group, dba X-Doria, dba Defense by X-
4 Doria, dba Raptic, dba Noémie) is a registered California corporation currently doing
5 business in this Judicial District, has purposefully availed itself of the privilege of
6 conducting business with residents of this Judicial District, has purposefully reached out to
7 residents of this Judicial District, and has established sufficient minimum contacts with the
8 State of California such that it should reasonably and fairly anticipate being haled into court
9 in California.

10 12. Venue in this Judicial District is proper under 28 U.S.C. § 1400(b) because
11 Defendant resides in this Judicial District.

12 **THE ACCUSED PRODUCTS**

13 13. Defendant has infringed certain claims of the Asserted Patents through the
14 manufacture, sale, offer for sale, advertisement, importation, shipment, distribution, and/or
15 use of Defendant’s protective masks for mobile devices (herein referred to as the “Accused
16 Products”).

17 14. As presently advised, the Accused Products include the following categories
18 of protective masks for mobile devices (“Case Styles”): Air (Defense Air); Citadel; Clear
19 (Defense Clear); Clutch; Clutch MagSafe; Dash; Earth; Engage Folio; Fort MagSafe; Lux
20 (Defense Lux); Napa Crossbody; Prime; Secure; Secure MagSafe; Shield (Defense Shield);
21 Shield Pro Magnet; Shield Wallet; Slim; Tactical; Terrain; Ultra; and Urban Folio. (See
22 Exhibit C; <https://rapticstrong.com/> and related urls in the rapticstrong.com domain;
23 [https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX](https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX0DER)
24 [0DER, https://www.amazon.com/stores/X-Doria/X-Doria/page/EC7F7157-B87B-43EF-](https://www.amazon.com/stores/X-Doria/X-Doria/page/EC7F7157-B87B-43EF-A45B-F474E5F17F45)
25 [A45B-F474E5F17F45, and https://www.amazon.com/stores/Raptic/page/7B2A3DDC-](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629)
26 [C4FE-4018-A65E-F2230DBCA629](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629) and related “X-Doria” and “Raptic” product pages
27 accessed through Amazon.com’s website;
28 https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARap

1 tic and related “X-Doria” and “Raptic” product pages accessed through Walmart.com’s
2 website; [https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-](https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0)
3 [55n9sZq643leqcob0](https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0) and related “Raptic” and “Noémie” product pages accessed through
4 Target.com’s website; and
5 [https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
6 [8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_f](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
7 [acet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=cat](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
8 [egoryid%24abcat0811006&type=page&usc=All%20Categories](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories) and related “Raptic” and
9 “Noémie” product pages accessed through BestBuy.com’s website).

10 15. As presently advised, the Accused Products include protective masks for at
11 least the following mobile devices: Apple iPhone 5; Apple iPhone 5s; Apple iPhone 6;
12 Apple iPhone 6 Plus; Apple iPhone 6s; Apple iPhone 6s Plus; Apple iPhone SE 1 (2016);
13 Apple iPhone 7; Apple iPhone 7 Plus; Apple iPhone 8; Apple iPhone 8 Plus; Apple iPhone
14 X; Apple iPhone XS; Apple iPhone XS Max; Apple iPhone XR; Apple iPhone SE 2 (2020);
15 Apple iPhone 11; Apple iPhone 11 Pro; Apple iPhone 11 Pro Max; Apple iPhone 12 mini;
16 Apple iPhone 12; Apple iPhone 12 Pro; Apple iPhone 12 Pro Max; Apple iPhone SE 3
17 (2022); Apple iPhone 13 mini; Apple iPhone 13; Apple iPhone 13 Pro; Apple iPhone 13
18 Pro Max; Apple iPhone 14; Apple iPhone 14 Plus; Apple iPhone 14 Pro; Apple iPhone 14
19 Pro Max; Huawei P10; Huawei P10 Plus; Huawei P10 Lite; Huawei P20; Huawei P20 Lite;
20 Samsung Galaxy A01; Samsung Galaxy A11; Samsung Galaxy A21; Samsung Galaxy
21 A33; Samsung Galaxy A41; Samsung Galaxy A51; Samsung Galaxy A53; Samsung
22 Galaxy A71; Samsung Galaxy A8; Samsung Galaxy Note 8; Samsung Galaxy Note 9;
23 Samsung Galaxy Note 10; Samsung Galaxy Note 10+; Samsung Galaxy Note 20; Samsung
24 Galaxy Note 20 Ultra; Samsung Galaxy S8; Samsung Galaxy S8+; Samsung Galaxy S9;
25 Samsung Galaxy S9+; Samsung Galaxy S10e; Samsung Galaxy S10; Samsung Galaxy
26 S10+; Samsung Galaxy S20; Samsung Galaxy S20+; Samsung Galaxy S20 Ultra; Samsung
27 Galaxy S21; Samsung Galaxy S21+; Samsung Galaxy S21 Ultra; Samsung Galaxy S22;
28 Samsung Galaxy S22+; and Samsung Galaxy S22 Ultra. (See Exhibit C;

1 <https://rapticstrong.com/> and related urls in the rapticstrong.com domain;
2 [https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX](https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX0DER)
3 [https://www.amazon.com/stores/X-Doria/X-Doria/page/EC7F7157-B87B-43EF-](https://www.amazon.com/stores/X-Doria/X-Doria/page/EC7F7157-B87B-43EF-A45B-F474E5F17F45)
4 [A45B-F474E5F17F45,](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629) and [https://www.amazon.com/stores/Raptic/page/7B2A3DDC-](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629)
5 [C4FE-4018-A65E-F2230DBCA629](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629) and related “X-Doria” and “Raptic” product pages
6 accessed through Amazon.com’s website;
7 [https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARap](https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARaptic)
8 tic and related “X-Doria” and “Raptic” product pages accessed through Walmart.com’s
9 website; [https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-](https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0)
10 [55n9sZq643leqcob0](https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0) and related “Raptic” and “Noémie” product pages accessed through
11 Target.com’s website; and
12 [https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
13 [8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_f](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
14 [acet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=cat](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
15 [egoryid%24abcat0811006&type=page&usc=All%20Categories](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories) and related “Raptic” and
16 “Noémie” product pages accessed through BestBuy.com’s website).

17 16. As presently advised, the Accused Products include Defendant’s cases found
18 at <https://rapticstrong.com/> and related urls in the rapticstrong.com domain;
19 [https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX](https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX0DER)
20 [https://www.amazon.com/stores/X-Doria/X-Doria/page/EC7F7157-B87B-43EF-](https://www.amazon.com/stores/X-Doria/X-Doria/page/EC7F7157-B87B-43EF-A45B-F474E5F17F45)
21 [A45B-F474E5F17F45,](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629) and [https://www.amazon.com/stores/Raptic/page/7B2A3DDC-](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629)
22 [C4FE-4018-A65E-F2230DBCA629](https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629) and related “X-Doria” and “Raptic” product pages
23 accessed through Amazon.com’s website;
24 [https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARap](https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARaptic)
25 tic and related “X-Doria” and “Raptic” product pages accessed through Walmart.com’s
26 website; [https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-](https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0)
27 [55n9sZq643leqcob0](https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0) and related “Raptic” and “Noémie” product pages accessed through
28 Target.com’s website; and

1 [https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
2 [8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
3 [acet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=cat](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories)
4 [egoryid%24abcat0811006&type=page&usc=All%20Categories](https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories) and related “Raptic” and
5 “Noémie” product pages accessed through BestBuy.com’s website.

6 17. The Accused Products, as illustrated below, are those protective masks that
7 are capable of being coupled to a portion of a mobile device so that the mobile device will
8 not fall out of the protective mask. The Accused Products are those protective masks that
9 comprise a flange or retainer (as recited in the asserted claims, *infra*). The Accused
10 Products also may use flange(s) or retainer(s) in conjunction with substantial surface to
11 surface contact by the inner surface of the protective mask which conforms to the contour
12 of the outer surface of the mobile device, working together to provide non-permanent,
13 temporary protection to the mobile device. While not required by all asserted claims, the
14 Accused Products are protective masks that include openings to allow access to the
15 interface as well as inputs and outputs. See Exhibit C for exemplary photos for all
16 categories of Defendant’s Case Styles. Below are pictures of representative Accused
17 Products.

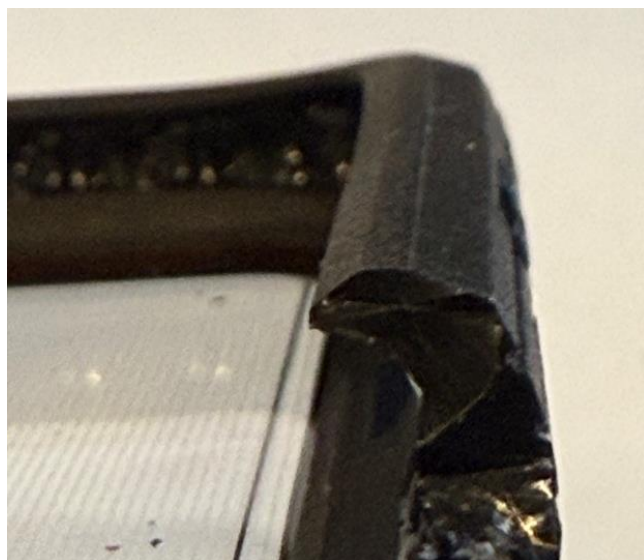
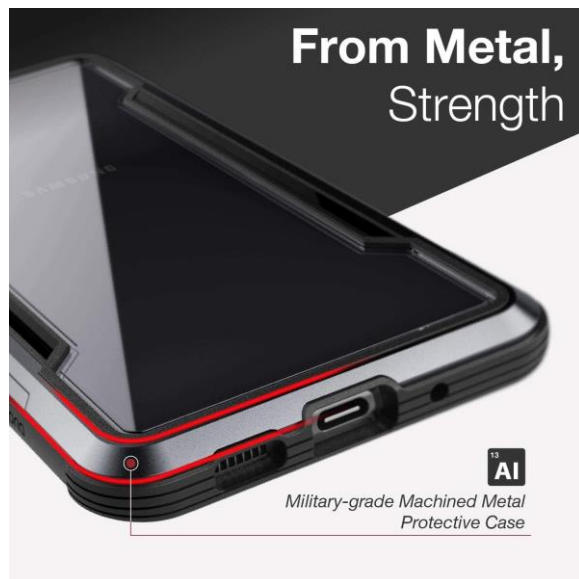
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RAPTIC Clear Case Compatible with iPhone 12 Pro Max Case, Anti-Yellow Slim Cover, Shock Absorbing Rubber, Scratch Resistant Protective Case, Fits iPhone 12 Pro Max, Blue: <https://www.amazon.com/dp/B088KVSWM7?th=1> (See Exhibit C and pictures of representative products).

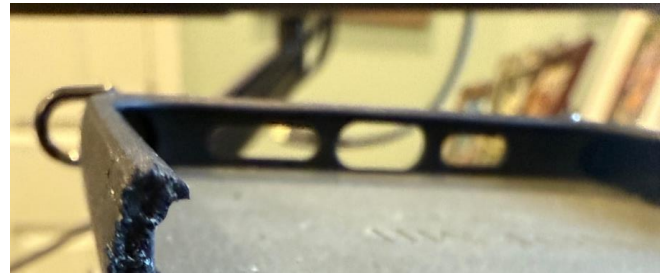
COMPLAINT FOR PATENT INFRINGEMENT

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X-Doria Raptic Shield, Samsung Galaxy S20 (Formerly Shield) - Military Grade Drop Tested, Anodized Aluminum, TPU, and Polycarbonate Protective Case, Samsung Galaxy S20, Red: <https://www.amazon.com/dp/B083F5WR91/?th=1> (See Exhibit C and pictures of representative products).

COMPLAINT FOR PATENT INFRINGEMENT



Noémie Apple iPhone 13 Pro Max/iPhone 12 Pro Max Wallet & Crossbody Strap Case: <https://www.target.com/p/no-mie-apple-iphone-13-pro-max-iphone-12-pro-max-wallet-crossbody-strap-case/-/A-86485696?preselect=84829258#lnk=sametab> (See Exhibit C and pictures of representative products).

18. The Accused Products subject to this Complaint include all substantively similar products and any predecessor and/or successor versions that satisfy each limitation

1 of, and therefore infringed, any asserted claim of the Asserted Patents whether sold directly
2 or via other online marketplaces or brick and mortar retail stores.

3 19. After adequate discovery, BelAir may seek leave to amend this Complaint to
4 include additional details of infringement, if any, by other products hereafter discovered to
5 infringe the Asserted Patents.

6 **INFRINGEMENT BY DEFENDANT**

7 **COUNT I: INFRINGEMENT OF UNITED STATES PATENT NO. 7,941,195**

8 20. Plaintiff BelAir realleges and incorporates by reference paragraphs 1 through
9 19, inclusive, as though fully set forth herein.

10 21. Defendant directly infringed at least independent Claim 9 of the ‘195 Patent
11 (prior to its expiration on or about November 16, 2022).

12 **CLAIM 9**

13 22. The Accused Products, as manufactured, sold, offered for sale, advertised,
14 imported, shipped, distributed, and/or used by Defendant, comprised a protective mask
15 adapted to be coupled to an exterior housing of a mobile phone having internal components
16 including circuitry and a battery, which are covered by the exterior housing, in accordance
17 with the limitations of Claim 9 of the ‘195 Patent.

18 23. Specifically, the Accused Products comprised:

- 19 a. a first mask portion, molded to conform to the shape of a first portion
20 of the exterior housing of the mobile phone; and
21 b. the first mask portion having flanges to allow the first mask portion to
22 be coupled to the mobile phone to retain the first mask portion to the
23 first portion of the exterior housing so that the first mask portion covers
24 the first portion of the exterior housing of the mobile phone.

25 24. To the extent required by law, BelAir has complied with the provisions of 35
26 U.S.C. § 287.

27 25. Defendant had notice of the ‘195 Patent and the likelihood of infringement
28 thereof at least as early as November 18, 2022, pursuant to email correspondence from

1 BelAir to Defendant via Doria’s Director, Matthew Brown. Counsel for Defendant
2 responded to BelAir in December 2022. Counsel for the parties exchanged correspondence
3 through November 2023, at which time counsel for Defendant ceased responding. Further
4 correspondence was sent directly to Defendant in 2024. Defendant did not respond to
5 BelAir’s 2024 communications, leaving BelAir no choice but to file this litigation in order
6 to protect its intellectual property rights.

7 26. Defendant’s direct infringement as described above, either literally or under
8 the doctrine of equivalents, has injured BelAir and BelAir is entitled to recover damages
9 adequate to compensate it for such infringement, but in no event less than a reasonable
10 royalty.

11 **COUNT II: INFRINGEMENT OF UNITED STATES PATENT NO. 10,097,676**

12 27. Plaintiff BelAir realleges and incorporates by reference paragraphs 1 through
13 19, inclusive, as though fully set forth herein.

14 28. Defendant directly infringed at least independent Claims 1, 5, 8, and 9 of the
15 ‘676 Patent (prior to its expiration on or about October 23, 2021).

16 **CLAIM 1**

17 29. The Accused Products, as manufactured, sold, offered for sale, advertised,
18 imported, shipped, distributed, and/or used by Defendant, comprised a protective mask
19 molded for frictional retention to an exterior housing of a mobile phone having user input
20 and output interfaces, and internal components including circuitry and a battery, wherein
21 the exterior housing completely encloses the circuitry and the battery when the mobile
22 phone is fully assembled and ready for use, the exterior housing having an exterior shape
23 formed by a back surface, and at least portions of opposed side surfaces, in accordance
24 with the limitations of Claim 1 of the ‘676 Patent.

25 30. Specifically, the Accused Products comprised:

- 26 a. an integrally-formed mask body molded and contoured to conform and
27 frictionally-fit tightly against the exterior shape of the exterior housing;
28

- b. an inner surface of the integrally-formed mask body defining an interior space of the integrally-formed mask body and conforming to and in substantially continuous surface-to-surface contact with the exterior shape of the exterior housing, with no substantial space between the inner surface of the integrally-formed mask body and the exterior shape of the exterior housing;
- c. at least one opening defined by the integrally-formed mask body permitting user access to at least the user input and output interfaces; and
- d. at least one retainer having an extension protruding laterally inward from the integrally-formed mask body and toward and into the integrally-formed mask body interior space, wherein the at least one retainer is retained to the exterior housing at an exterior housing edge when the mask is coupled to the mobile communication device, the at least one retainer participating in retaining the integrally-formed mask body to the mobile communication device.

31. As presently advised, one or more Accused Products also likely satisfied the limitations of, and infringed, dependent Claims 3 and 4 of the '676 Patent.

CLAIM 5

32. The Accused Products, as manufactured, sold, offered for sale, advertised, imported, shipped, distributed, and/or used by Defendant, comprised a protective mask molded for frictional retention to an exterior housing of, and adapted to be coupled to, a mobile communication device having internal components including circuitry and a battery, wherein the exterior housing completely encloses the circuitry and battery when the mobile communication device is fully assembled and ready for use, and wherein the exterior housing has an exterior shape including a back face and at least portions of opposed side surfaces, in accordance with the limitations of Claim 5 of the '676 Patent.

33. Specifically, the Accused Products comprised:

- 1 a. an integrally-formed mask body molded and contoured to conform and
2 frictionally fit to the exterior shape of the exterior housing;
- 3 b. an inner surface of the integrally-formed mask body defining an interior
4 space of the integrally-formed mask body and conforming to and in
5 substantially continuous surface-to-surface contact with the exterior
6 shape of the exterior housing in overlying and protecting relationship,
7 without a substantial gap between the inner surface of the integrally-
8 formed mask body and the exterior shape of the exterior housing, the
9 integrally-formed mask body defining an opening enabling the mask to
10 be placed over the exterior shape in overlying and protecting
11 relationship; and
- 12 c. at least one retainer having an extension protruding laterally inward
13 from the integrally-formed mask body and toward and into the
14 integrally-formed mask body interior space, wherein the at least one
15 retainer is retained to the exterior housing at an exterior housing edge
16 when the mask is coupled to the mobile communication device, the at
17 least one retainer participating in retaining the integrally-formed mask
18 body to the mobile communication device.

19 34. As presently advised, one or more Accused Products also likely satisfied the
20 limitations of, and infringed, dependent Claims 6 and 7 of the '676 Patent.

21 **CLAIM 8**

22 35. The Accused Products, as manufactured, sold, offered for sale, advertised,
23 imported, shipped, distributed, and/or used by Defendant, comprised a mask for attachment
24 to a hand-held mobile phone, the mobile phone having user input and output interfaces,
25 internal components including circuitry and a battery, and an exterior housing completely
26 enclosing the circuitry and battery when the mobile phone is fully assembled and ready for
27 use, the exterior housing including a first face, a second face and opposed side surfaces
28 there between, in accordance with the limitations of Claim 8 of the '676 Patent.

1 36. Specifically, the Accused Products comprised:

- 2 a. an integrally-formed mask body molded to conform to a shape of the
3 exterior housing;
- 4 b. inner and outer surfaces, the surfaces defining at least one opening in
5 the integrally-formed mask body providing access to at least one of the
6 user input and output interfaces, the integrally-formed mask body being
7 configured such that, when the mask is attached to the mobile phone,
8 the integrally-formed mask body is coextensive with, contours to and
9 overlies the opposed side surfaces, with substantially no space between
10 the mask body and the opposed side surfaces; and
- 11 c. at least one retainer having an extension protruding laterally inward
12 from the integrally-formed mask body and toward and into the
13 integrally-formed mask body interior space, wherein the at least one
14 retainer is retained to the exterior housing at an exterior housing edge
15 when the mask is coupled to the mobile communication device, the at
16 least one retainer participating in retaining the integrally-formed mask
17 body to the mobile communication device.

18 **CLAIM 9**

19 37. The Accused Products, as manufactured, sold, offered for sale, advertised,
20 imported, shipped, distributed, and/or used by Defendant, comprised a protective mask
21 molded for frictional retention to an exterior housing of a fully assembled mobile
22 communication device having user input and output interfaces, the mobile communication
23 device further having internal components including circuitry and a battery completely
24 enclosed by the exterior housing, and the exterior housing having an exterior shape formed
25 by a back surface and at least portions of opposed side surfaces, in accordance with the
26 limitations of Claim 9 of the '676 Patent.

27 38. Specifically, the Accused Products comprised:
28

- 1 a. an inner surface closely conforming to the exterior shape of the exterior
2 housing and in substantially continuous surface-to-surface contact with
3 the exterior shape of the exterior housing, with substantially no space
4 between the inner surface of the protective mask and the exterior shape
5 when the protective mask is retained to the exterior housing, the
6 protective mask being molded, integrally formed, contoured and sized
7 to fit tightly against the exterior shape of the exterior housing, thereby
8 providing retention of the protective mask to the exterior housing;
- 9 b. at least one opening defined by the protective mask permitting user
10 access to at least the user input and output interfaces; and
- 11 c. at least one retainer having an extension protruding laterally inward
12 from the integrally-formed mask body and toward and into the
13 integrally-formed mask body interior space, wherein the at least one
14 retainer is retained to the exterior housing at an exterior housing edge
15 when the mask is coupled to the mobile communication device, the at
16 least one retainer participating in retaining the integrally-formed mask
17 body to the mobile communication device.

18 39. As presently advised, one or more Accused Products also likely satisfied the
19 limitations of, and infringed, dependent Claims 11 and 12 of the '676 Patent.

20 40. To the extent required by law, BelAir has complied with the provisions of 35
21 U.S.C. § 287.

22 41. Defendant had notice of the '676 Patent and the likelihood of infringement
23 thereof at least as early as November 18, 2022, pursuant to email correspondence from
24 BelAir to Defendant via Doria's Director, Matthew Brown. Counsel for Defendant
25 responded to BelAir in December 2022. Counsel for the parties exchanged correspondence
26 through November 2023, at which time counsel for Defendant ceased responding. Further
27 correspondence was sent directly to Defendant in 2024. Defendant did not respond to
28

1 BelAir’s 2024 communications, leaving BelAir no choice but to file this litigation in order
2 to protect its intellectual property rights.

3 42. Defendant’s direct infringement as described above, either literally or under
4 the doctrine of equivalents, has injured BelAir and BelAir is entitled to recover damages
5 adequate to compensate it for such infringement, but in no event less than a reasonable
6 royalty.

7 **PRAYER FOR RELIEF**

8 A. WHEREFORE, Plaintiff BelAir Electronics, Inc. respectfully requests this
9 Court to enter judgment against Doria International Inc (dba Doria Group, dba X-Doria,
10 dba Defense by X-Doria, dba Raptic, dba Noémie)– and against each of its subsidiaries,
11 successors, parents, affiliates, officers, directors, agents, servants, employees, and all
12 persons in active concert or participation with it – granting the following relief:

13 B. The entry of judgment in favor of Plaintiff and against Defendant;

14 C. An award of damages against Defendant adequate to compensate Plaintiff for
15 the infringement that occurred from at least February 10, 2019 through expirations of the
16 Asserted Patents, but in no event less than a reasonable royalty as permitted by 35 U.S.C.
17 § 284, together with prejudgment interest from the date infringement began; and

18 D. Such other relief to which Plaintiff is entitled under the law and any other and
19 further relief that this Court or a jury may deem just and proper.

20 **JURY DEMAND**

21 Plaintiff demands a trial by jury on all issues presented in this Complaint.
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1 Dated: February 10, 2025

Respectfully submitted,

2 */s/ Marc Libarle*

3 LAW OFFICES OF MARC LIBARLE

4 Marc Libarle (CABN: 071678)

5 ml7006@gmail.com

6 1388 Sutter St, Ste 910

7 San Francisco, CA 94109

(415) 928-2400

8 HALLER LAW PLLC

9 Timothy J. Haller (*Pro Hac Vice Pending*)

10 haller@haller-iplaw.com

11 *Attorneys for Plaintiff,*

12 *BelAir Electronics, Inc.*

EXHIBIT A

TO

COMPLAINT FOR PATENT INFRINGEMENT

**United States Patent No.
7,941,195**



US007941195B2

(12) **United States Patent
Peng**

(10) **Patent No.:** US 7,941,195 B2
(45) **Date of Patent:** *May 10, 2011

(54) **PROTECTIVE MASK OF MOBILE PHONE**

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(75) Inventor: **Kuan-Lin Peng**, Taipei (TW)

(73) Assignee: **Gregory J. Kim**, Westmont, IL (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 654 days.

This patent is subject to a terminal disclaimer.

(Continued)

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(21) Appl. No.: **11/673,237**

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(22) Filed: **Feb. 9, 2007**

IL Telefono Cellulare & C. 2 pages. Date: Oct. 2000. (Shows replacement mobile telephone housing portions.).

(65) **Prior Publication Data**

US 2007/0191079 A1 Aug. 16, 2007

Related U.S. Application Data

(63) Continuation of application No. 09/888,488, filed on Jun. 26, 2001, now Pat. No. 7,194,291.

Primary Examiner — Kent Chang

Assistant Examiner — Dinh P Nguyen

(74) *Attorney, Agent, or Firm* — Jansson Shupe & Munger Ltd.

(30) **Foreign Application Priority Data**

Nov. 17, 2000 (CN) 00 2 52902 U

(57) **ABSTRACT**

The present invention relates to a protective mask of mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies can be joined with a front and a rear phone housings of a mobile phone, respectively, to effectively prevent abrasion of the mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided. Moreover, trend and fashion of the mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

(51) **Int. Cl.**

H04M 1/00 (2006.01)

(52) **U.S. Cl.** **455/575.8**; 455/550.1; 455/575.1

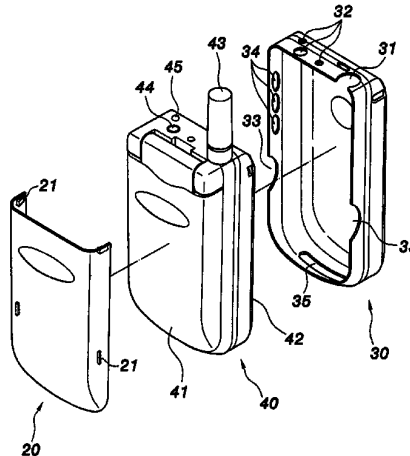
(58) **Field of Classification Search** 455/575.8, 455/575.9, 575.1, 550.1, 90.1, 90.3, 348, 455/349, 550; 379/433.01, 433.11, 451
See application file for complete search history.

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12 Claims, 7 Drawing Sheets



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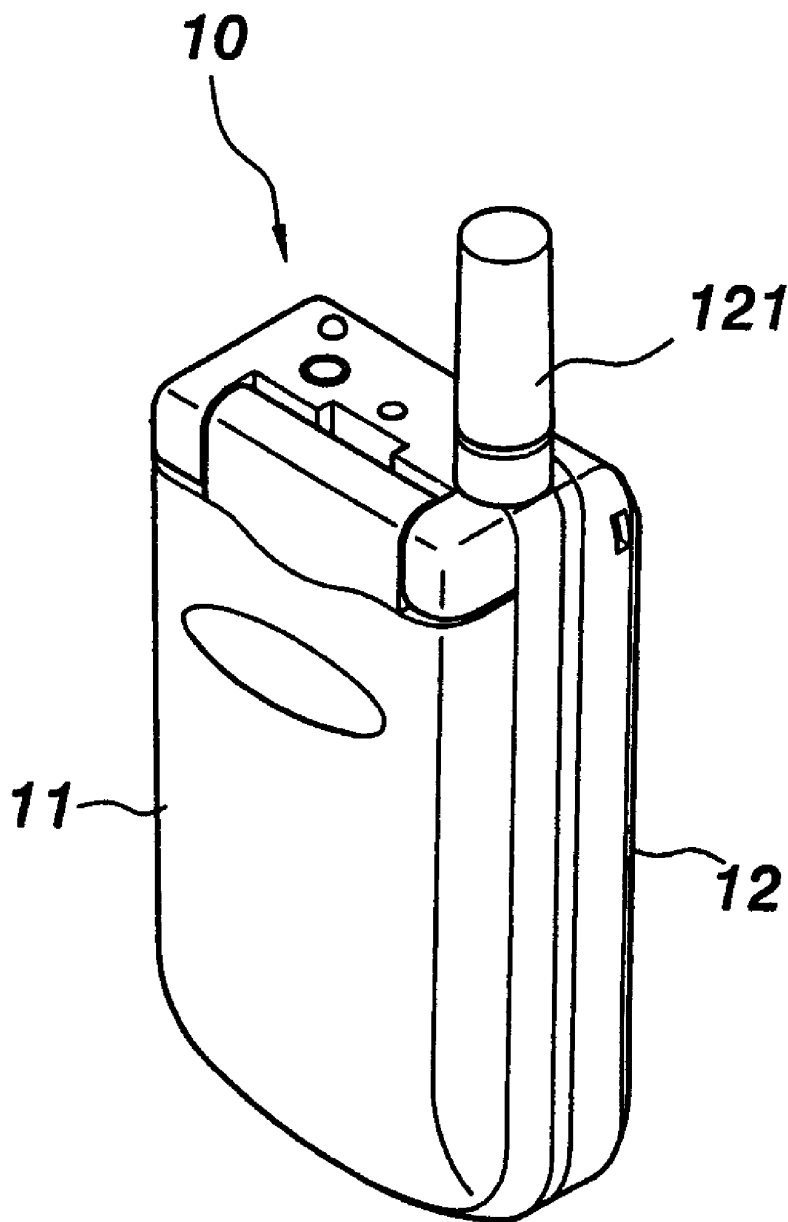


FIG. 1
PRIOR ART

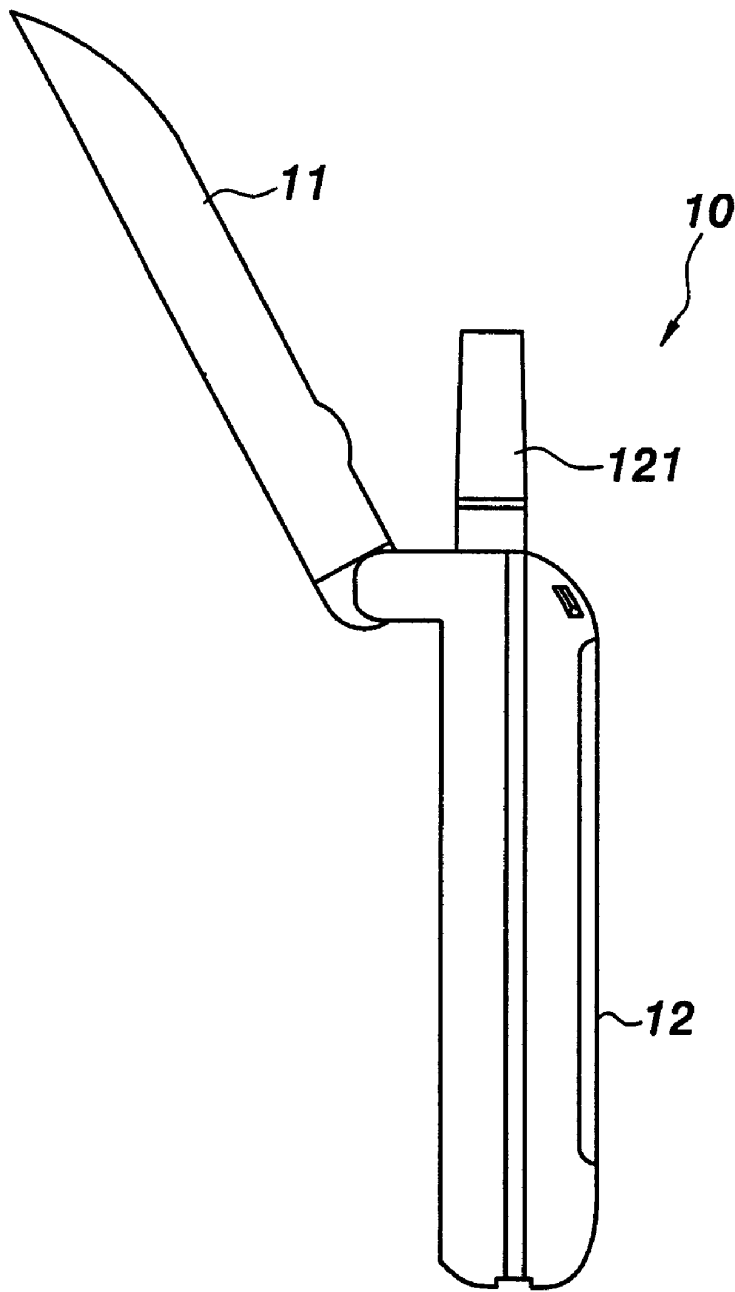


FIG. 2
PRIOR ART

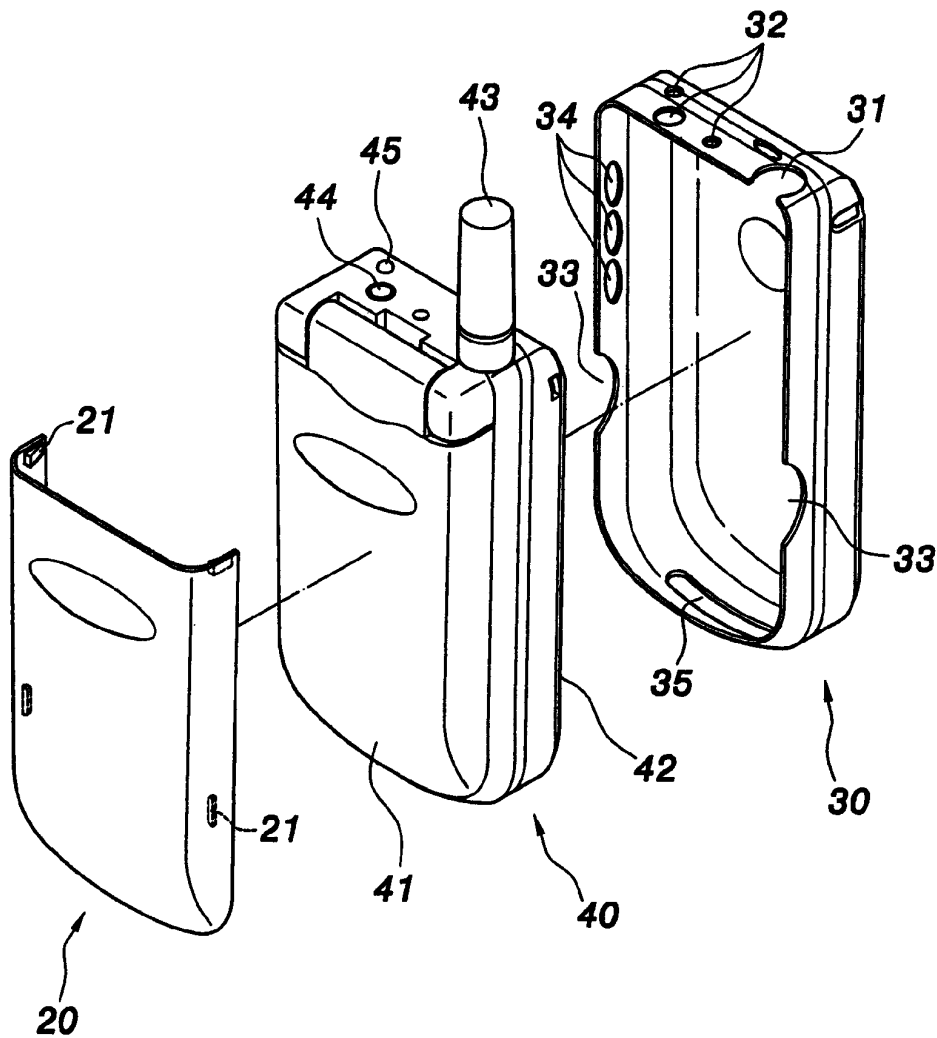


FIG. 3

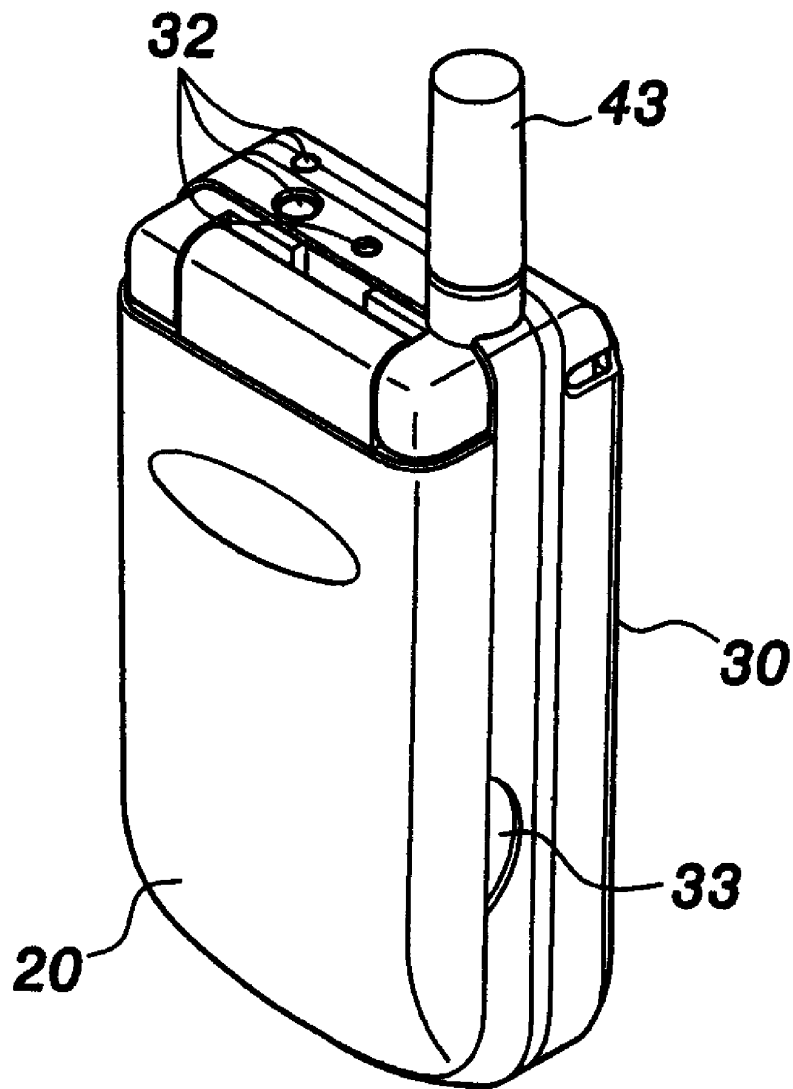


FIG. 4

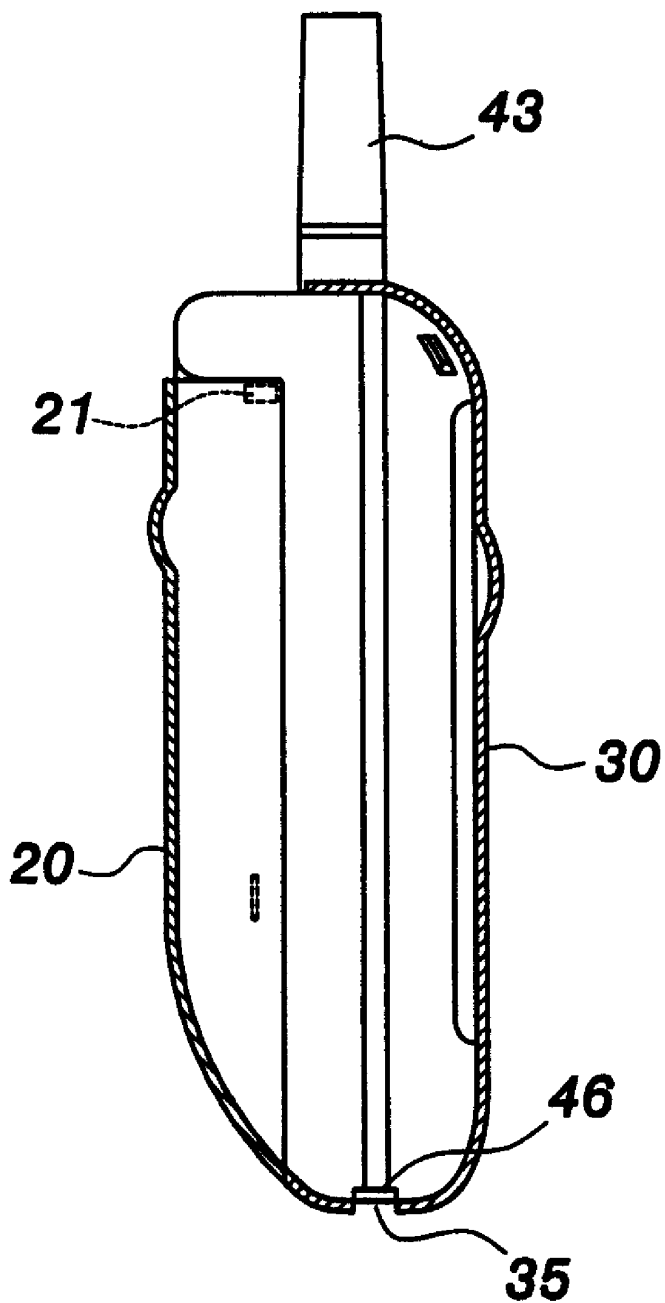


FIG. 5

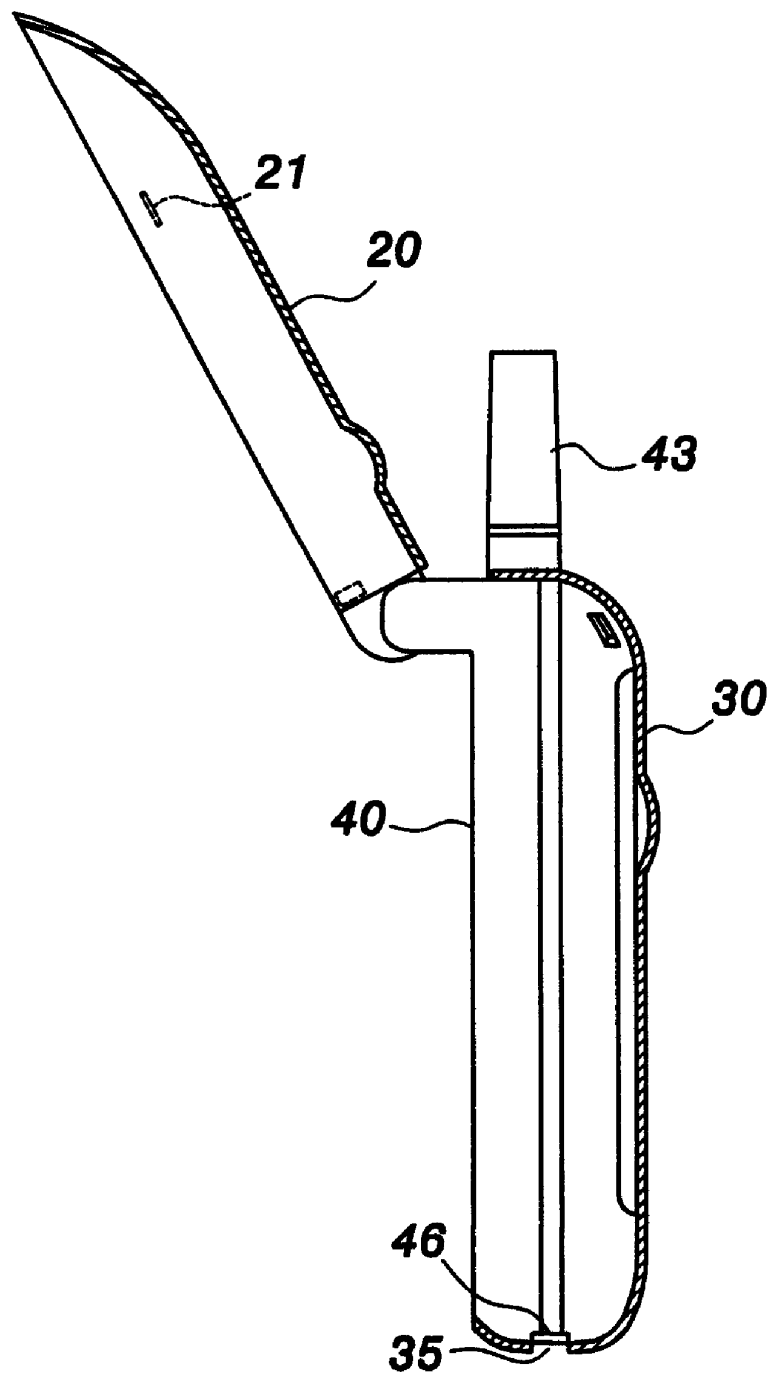


FIG. 6

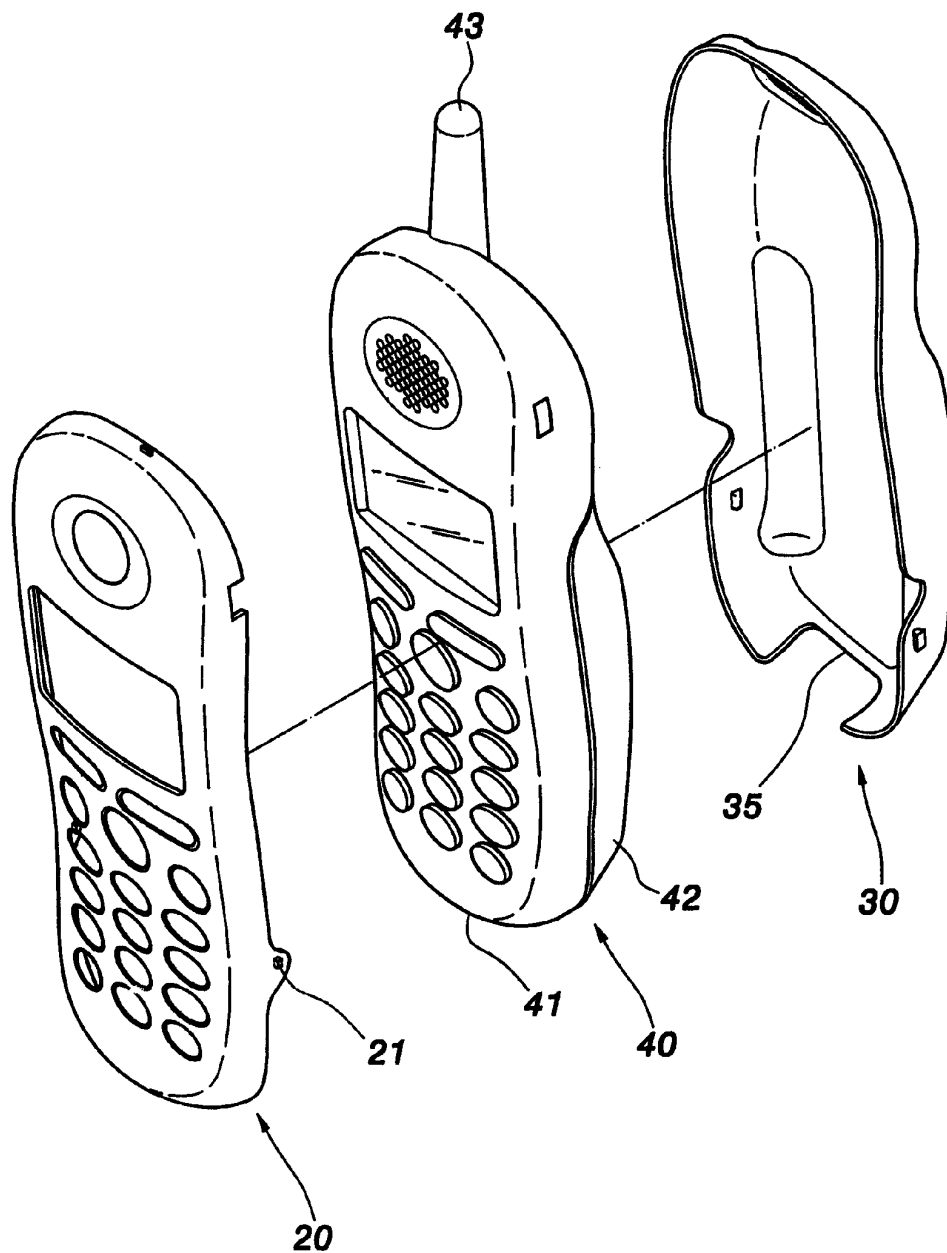


FIG. 7

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PROTECTIVE MASK OF MOBILE PHONECROSS-REFERENCE TO RELATED PATENT
APPLICATIONS

This continuation application claims priority to U.S. patent application Ser. No. 09/888,488 filed Jun. 26, 2001, now U.S. Pat. No. 7,194,291 and Chinese Patent Application No. CN00252902.5 filed Nov. 17, 2000, which are expressly incorporated by reference herein.

FIELD OF THE INVENTION

The present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone

BACKGROUND OF THE INVENTION

FIGS. 1 and 2 show the structure of a prior art mobile phone. The outer look of the structure is approximately a rectangular parallelepiped comprising a front phone housing and a rear phone housing. One end of the front phone housing 11 is pivotally joined with one end of the rear phone housing 12, as shown in FIG. 2. An antenna 121 is disposed on the rear phone housing 12. A mobile phone 10 is formed after assembling the front and rear phone housings 11 and 12. The mobile phone 10 can be used for receiving a call, dialing a telephone number, making a call, displaying messages, and setting functions.

However, because the front and rear phone housings 11 and 12 of the mobile phone 10 are very smooth and delicate, abrasion may easily arise due to carelessness of a user so as to generate ill-favored scars thereon, resulting in the deterioration of the quality of the mobile phone and the fall of its value.

Moreover, the design of the mobile phone 10 tends to be more and more diversified in consideration of trend and fashion. The user usually spends a lot of money to change the mobile phone 10 to adhere to the fashion, resulting in waste of money.

Accordingly, the above mobile phone structure has inconvenience and drawbacks in practical installation and use. The present invention aims to resolve the problems in the prior art.

SUMMARY OF THE INVENTION

The primary object of the present invention is to provide a protective mask of mobile phone to effectively prevent abrasion of a mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided.

The secondary object of the present invention is to provide a protective mask of mobile phone so that trend and fashion of a mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

To achieve the above objects, the present invention provides a protective mask of mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies are integrally formed by means of mold ejection of plastic. Patterns, types, or nameplates can be printed on the upper and lower cover bodies. The upper and lower cover bodies can sheathe a mobile phone therein. A gap, cavities, and slots corresponding to an antenna, an earphone cavity, an incoming-call informing light and so on of the mobile phone are disposed on the lower cover body so that a user can

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successfully receive a call and use various kinds of functions and settings of the mobile phone.

The various objects and advantages of the present invention will be more readily understood from the following detailed description when read in conjunction with the appended drawings, in which:

BRIEF DESCRIPTION OF THE DRAWINGS

FIG. 1 is a perspective view of a prior art mobile phone; FIG. 2 is a diagram showing the use state of a prior art mobile phone;

FIG. 3 is an exploded perspective view of the present invention and a mobile phone;

FIG. 4 is a perspective view of the present invention assembled with a mobile phone;

FIG. 5 is a cross-sectional view of the present invention assembled with a mobile phone;

FIG. 6 is a diagram showing the use state of the present invention assembled 10 with a mobile phone; and

FIG. 7 is an exploded perspective view according to a second embodiment of the present invention.

DETAILED DESCRIPTION OF THE PREFERRED
EMBODIMENTS

As shown in FIGS. 3 to 6, the present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone. The protective mask of mobile phone of the present invention comprises an upper cover body 20 and a lower cover body 30.

The upper cover body 20 is integrally formed by mold ejection of plastic. Patterns, types, or nameplates can be printed on a front side face of the upper 20 cover body 20. The upper cover body 20 can be joined with a front phone housing 41 of a mobile phone 40, as shown in FIG. 4. A rear side face of the upper cover body 20 has a plurality of flanges 21, as shown in FIG. 3. The flanges 21 can be retained at the edge of the front phone housing 41 of the mobile phone 40. The front phone housing 41 of the mobile phone 40 can be sheathed in the upper cover body 20, as shown in FIG. 5.

The lower cover body 30 is integrally formed by mold ejection of plastic. Patterns, types, or nameplates can be printed on the lower cover body 30. The lower cover body 30 can be joined with a rear phone housing 42 of the mobile phone 40, as shown in FIG. 4. The lower cover body 30 has a gap 31 to retain an antenna 43 of the mobile phone 40, as shown in FIG. 3. A plurality of cavities 32 are disposed beside the gap 31 of the lower cover body 30. The cavities 32 can correspond to an earphone cavity 44, an incoming-call informing light 45 and so on of the mobile phone 40 so that a user can conveniently use the functions of the mobile phone 40.

Finger recessions 33 are respectively disposed at two sides of the lower cover body 30 so that a user can easily unfold the pivotally joined front phone housing 41 and rear phone housing 42 to receive a call or operate the mobile phone 40, as shown in FIG. 6. The finger recessions 33 can also let the user conveniently separate the mobile phone 40 and the lower cover body 30 for performing operations such as replacing a battery (not shown) of the mobile phone 40. A plurality of holes 34 are disposed at one side of the lower cover body 30. The holes 34 can correspond to function keys (not shown) of the mobile phone 40 so that the user can successfully receive a call or set functions.

A bottom of the lower cover body 30 has a slot 35, which can correspond to a socket 46 (shown in FIG. 5) of the mobile

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phone **40** so that a user can plug in a power supply (not shown) of the mobile phone **40** to charge or recharge the mobile phone **40**.

As shown in FIG. 7, a different upper cover body **20** and a different lower cover body **30** are matched according to the outer look of a different mobile phone **40** so as to satisfy users having different mobile phones **40**. The connection and disposition ways are the same as the above first embodiment of the present invention.

The present invention uses the upper cover body **20** and the lower cover body **30** to sheathe the mobile phone **40** therein so as to effectively prevent abrasion of the mobile phone **40** due to the carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Moreover, trend and fashion of the mobile phone **40** can be achieved without the need of replacing the mobile phone **40**.

Although the present invention has been described with reference to the preferred embodiments thereof, it will be understood that the invention is not limited to the details thereof. Various substitutions and modifications have been suggested in the foregoing description, and others will occur to those of ordinary skill in the art. Therefore, all such substitutions and modifications are intended to be embraced within the scope of the invention as defined in the appended claims.

What is claimed is:

1. A protective mask adapted to be coupled to an exterior housing of a mobile phone having internal components including circuitry and a battery, which are covered by the exterior housing, the protective mask comprising:

a first mask portion, molded to conform to the shape of a first portion of the exterior housing of the mobile phone, the first mask portion adapted to be coupled to the mobile phone to retain the first mask portion to the first portion of the exterior housing so that the first mask portion covers the first portion of the exterior housing of the mobile phone; and

a second mask portion, molded to conform to the shape of a second portion of the exterior housing of the mobile phone, the second mask portion adapted to be coupled to the mobile phone to retain the second mask portion to the second portion of the exterior housing so that the second mask portion covers the second portion of the exterior housing of the mobile phone;

wherein said first and second mask portions are retained to the exterior housing of the mobile phone.

2. The protective mask of claim **1**, wherein patterns, types, or nameplates can be printed on said first and second mask portions.

3. The protective mask of claim **1**, wherein the first mask portion includes at least one opening to permit access to features of the mobile phone.

4. The protective mask of claim **1**, wherein said second mask portion includes at least one opening to permit access to features of the mobile phone.

5. The protective mask of claim **1**, wherein said second mask portion includes an opening corresponding to a socket

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of said mobile phone so that a user can conveniently plug in a power supply to charge said mobile phone.

6. A protective mask adapted to be coupled to an exterior housing of a mobile phone, the mobile phone having internal components including circuitry and a battery, which are covered by the exterior housing, the protective mask comprising:

a first mask portion, molded to conform to the shape of a first portion of the exterior housing of the mobile phone, the first mask portion is adapted to be coupled to the mobile phone to retain the first mask portion to the first portion of the exterior housing so that the first mask portion covers the first portion of the exterior housing of the mobile phone;

said first mask portion including an opening that is associated with an opening in the exterior housing to permit access to a feature of the mobile phone; and

a second mask portion, molded to conform to the shape of a second portion of the exterior housing of the mobile phone, the second mask portion adapted to be coupled to the mobile phone to retain the second mask portion to the second portion of the exterior housing so that the second mask portion covers the second portion of the exterior housing of the mobile phone;

wherein said first and second mask portions are retained to the exterior housing of the mobile phone.

7. The protective mask of claim **6**, wherein patterns, types, or nameplates can be printed on said first and second mask portions.

8. The protective mask of claim **6**, wherein the second mask portion includes an opening to permit access to a feature of the mobile phone.

9. A protective mask adapted to be coupled to an exterior housing of a mobile phone having internal components including circuitry and a battery, which are covered by the exterior housing, the protective mask comprising:

a first mask portion, molded to conform to the shape of a first portion of the exterior housing of the mobile phone, the first mask portion having flanges to allow the first mask portion to be coupled to the mobile phone to retain the first mask portion to the first portion of the exterior housing so that the first mask portion covers the first portion of the exterior housing of the mobile phone.

10. The protective mask of claim **9**, further comprising a second mask portion, molded to conform to the shape of a second portion of the exterior housing of the mobile phone, the second mask portion adapted to be coupled to the mobile phone to retain the second mask portion to the second portion of the exterior housing so that the second mask portion covers the second portion of the exterior housing of the mobile phone.

11. The protective mask of claim **10**, wherein patterns, types, or nameplates can be printed on the first and second mask portions.

12. The protective mask of claim **11**, wherein the first mask portion includes at least one opening to permit access to features of the mobile phone.

* * * * *

EXHIBIT B

TO

**COMPLAINT FOR PATENT
INFRINGEMENT**

**United States Patent No.
10,097,676**



US010097676B2

(12) **United States Patent**
Peng

(10) **Patent No.:** US 10,097,676 B2
(45) **Date of Patent:** *Oct. 9, 2018

(54) **PROTECTIVE MASK OF MOBILE PHONE**

USPC 455/90.1, 90.3, 348, 349, 433.01, 433.11,
455/451, 550, 550.1, 575.1

(75) Inventor: **Kuan-Lin Peng**, Taipai (TW)

See application file for complete search history.

(73) Assignee: **Gregory Jukyong Kim**, Westmont, IL (US)

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(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 119 days.

This patent is subject to a terminal disclaimer.

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(Continued)

(21) Appl. No.: **13/094,428**

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(22) Filed: **Apr. 26, 2011**

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(65) **Prior Publication Data**

US 2011/0201394 A1 Aug. 18, 2011

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Related U.S. Application Data

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(63) Continuation of application No. 11/673,237, filed on Feb. 9, 2007, now Pat. No. 7,941,195, which is a continuation of application No. 09/888,488, filed on Jun. 26, 2001, now Pat. No. 7,194,291.

Primary Examiner — Dinh Nguyen

(74) *Attorney, Agent, or Firm* — Invention Mine LLC

(30) **Foreign Application Priority Data**

Nov. 17, 2000 (CN) 252902

(57) **ABSTRACT**

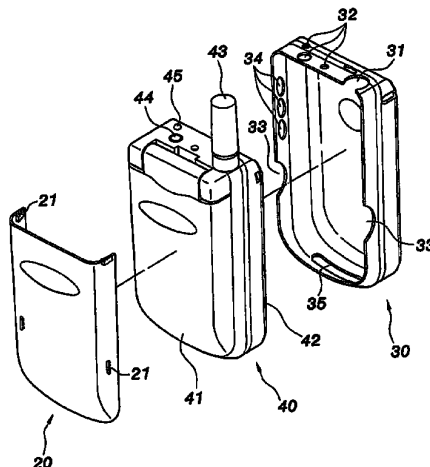
The present invention relates to a protective mask of mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies can be joined with a front and a rear phone housing of a mobile phone, respectively, to effectively prevent abrasion of the mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided. Moreover, trend and fashion of the mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

(51) **Int. Cl.**
H04M 1/02 (2006.01)
H04B 1/3888 (2015.01)

(52) **U.S. Cl.**
CPC **H04M 1/0283** (2013.01); **H04B 1/3888** (2013.01); **H04M 1/0214** (2013.01)

(58) **Field of Classification Search**
CPC . H04W 88/02; H04M 1/0283; H04M 1/0214;
H04M 1/0202; H04M 1/0212; H04M
1/0216; H04B 1/3888

12 Claims, 7 Drawing Sheets



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5,923,752	A *	7/1999	McBride et al. 379/433.11				
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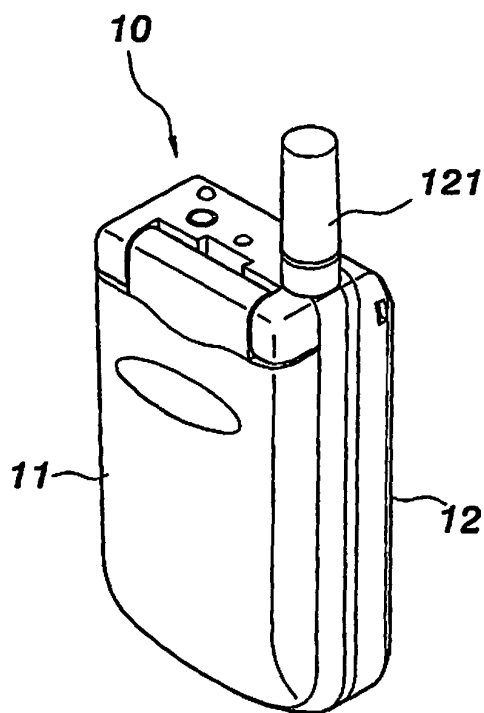


FIG. 1
PRIOR ART

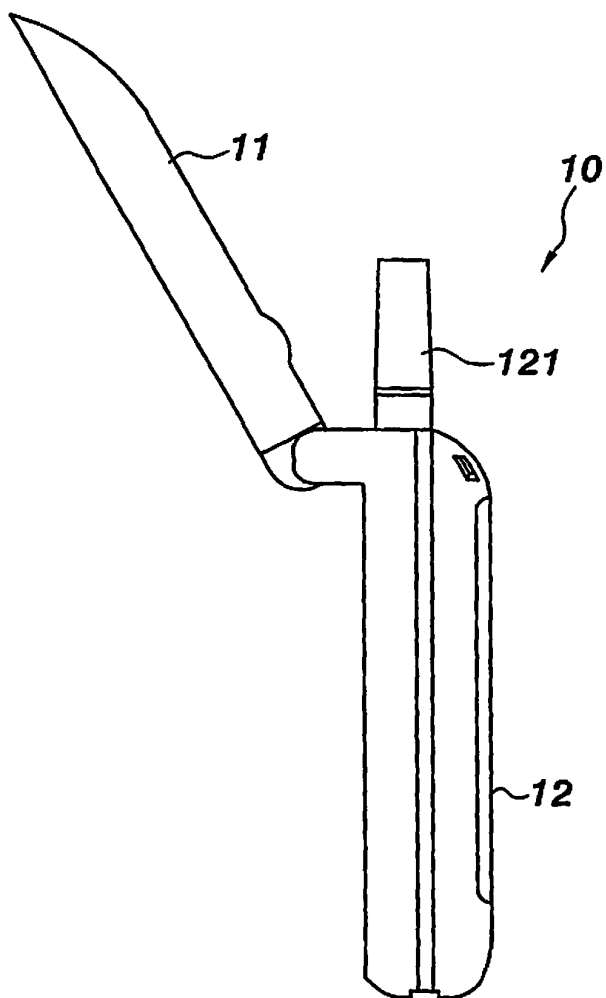


FIG. 2
PRIOR ART

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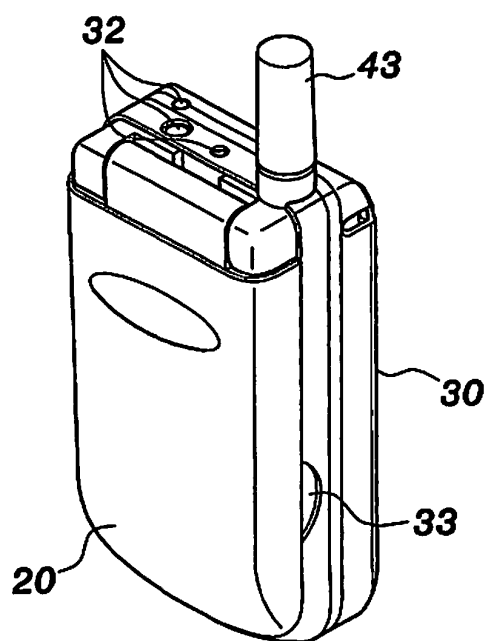


FIG. 4

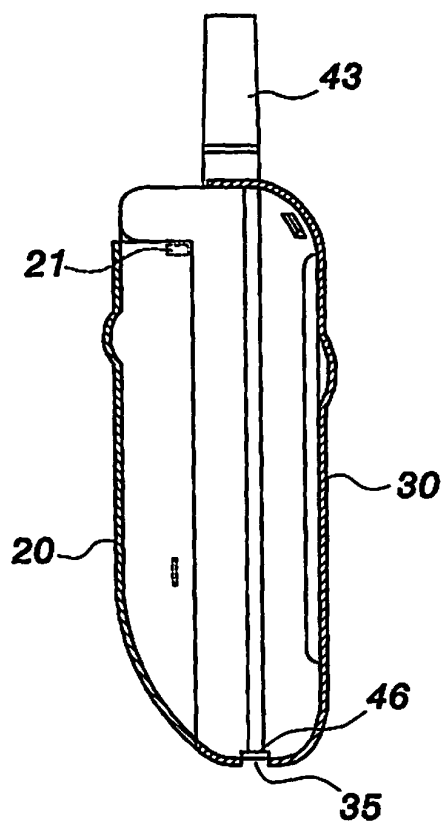


FIG. 5

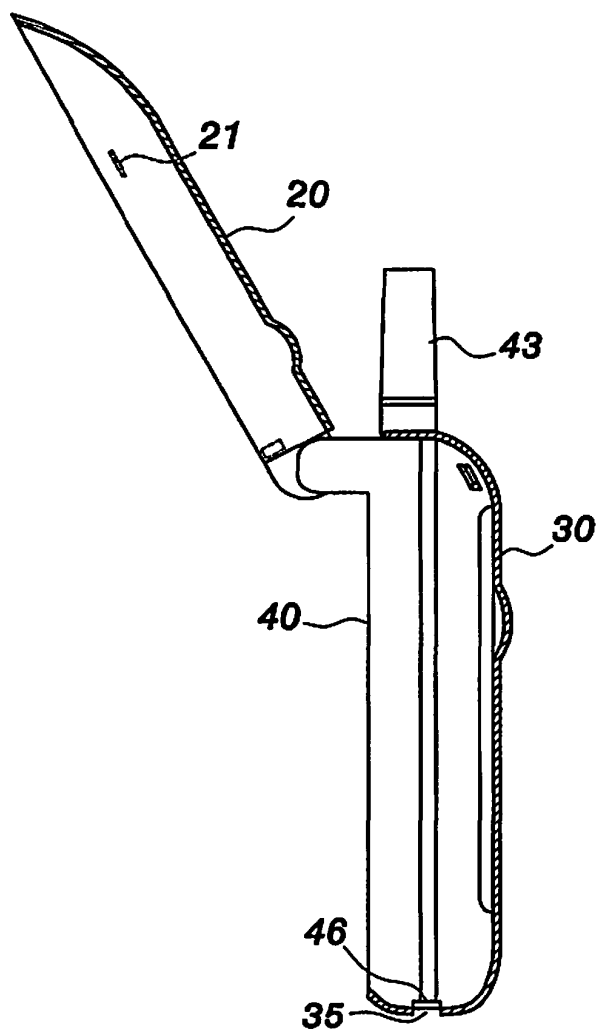


FIG. 6

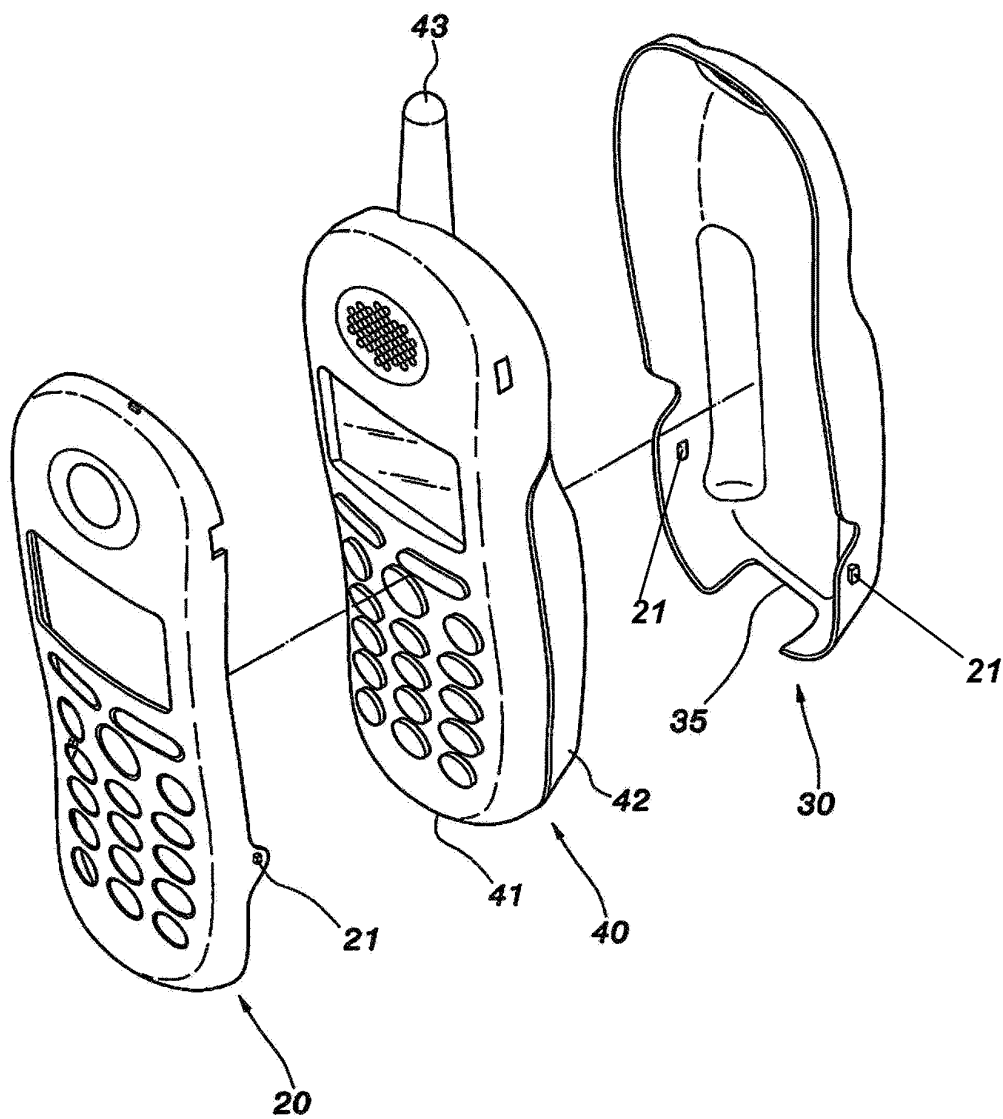


FIG. 7

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PROTECTIVE MASK OF MOBILE PHONE

RELATED APPLICATIONS

This application is a continuation of U.S. patent application Ser. No. 11/673,237, filed Feb. 9, 2007, now U.S. Pat. No. 7,941,195, which (i) is a continuation application of U.S. patent application Ser. No. 09/888,488, filed Jun. 26, 2001, now U.S. Pat. No. 7,194,291, and (ii) claims priority to Chinese Patent Application No. CN00252902.5, filed Nov. 17, 2000, the contents of which are incorporated herein by reference.

FIELD OF THE INVENTION

The present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone.

BACKGROUND OF THE INVENTION

FIGS. 1 and 2 show the structure of a prior art mobile phone. The outer look of the structure is approximately a rectangular parallelepiped comprising a front phone housing and a rear phone housing. One end of the front phone housing 11 is pivotally joined with one end of the rear phone housing 12, as shown in FIG. 2. An antenna 121 is disposed on the rear phone housing 12. A mobile phone 10 is formed after assembling the front and rear phone housings 11 and 12. The mobile phone 10 can be used for receiving a call, dialing a telephone number, making a call, displaying messages, and setting functions.

However, because the front and rear phone housings 11 and 12 of the mobile phone 10 are very smooth and delicate, abrasion may easily arise due to carelessness of a user so as to generate ill-favored scars thereon, resulting in the deterioration of the quality of the mobile phone and the fall of its value.

Moreover, the design of the mobile phone 10 tends to be more and more diversified in consideration of trend and fashion. The user usually spends a lot of money to change the mobile phone 10 to adhere to the fashion, resulting in waste of money.

Accordingly, the above mobile phone structure has inconvenience and drawbacks in practical installation and use. The present invention aims to resolve the problems in the prior art.

SUMMARY OF THE INVENTION

The primary object of the present invention is to provide a protective mask of mobile phone to effectively prevent abrasion of a mobile phone due to carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Therefore, the deterioration of the quality of the mobile phone and the fall of its value can be avoided.

The secondary object of the present invention is to provide a protective mask of mobile phone so that trend and fashion of a mobile phone can be achieved without the need of replacing the mobile phone. Therefore, waste of money can be avoided, and economic burden to the user can be lessened.

To achieve the above objects, the present invention provides a protective mask for a mobile phone comprising an upper cover body and a lower cover body. The upper and lower cover bodies are integrally formed by means of mold ejection of plastic. Patterns, types, or nameplates can be

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printed on the upper and lower cover bodies. The upper and lower cover bodies can sheathe a mobile phone therein. A gap, cavities, and slots corresponding to an antenna, an earphone cavity, an incoming-call informing light and so on of the mobile phone are disposed on the lower cover body so that a user can successfully receive a call and use various kinds of functions and settings of the mobile phone.

The various objects and advantages of the present invention will be more readily understood from the following detailed description when read in conjunction with the appended drawings, in which:

BRIEF DESCRIPTION OF THE DRAWINGS

FIG. 1 is a perspective view of a prior art mobile phone; FIG. 2 is a diagram showing the use state of a prior art mobile phone;

FIG. 3 is an exploded perspective view of the present invention and a mobile phone;

FIG. 4 is a perspective view of the present invention assembled with a mobile phone;

FIG. 5 is a cross-sectional view of the present invention assembled with a mobile phone;

FIG. 6 is a diagram showing the use state of the present invention assembled 10 with a mobile phone; and

FIG. 7 is an exploded perspective view according to a second embodiment of the present invention.

DETAILED DESCRIPTION OF PREFERRED EMBODIMENTS

As shown in FIGS. 3 to 6, the present invention relates to a protective mask of mobile phone and, more particularly, to an assembly structure used in a mobile phone. The protective mask of mobile phone of the present invention comprises an upper cover body 20 and a lower cover body 30.

The upper cover body 20 is integrally formed by mold injection of plastic. Patterns, types, or nameplates can be printed on a front side face of the upper cover body 20. The upper cover body 20 can be joined with a front phone housing 41 of a mobile phone 40, as shown in FIG. 4. A rear side face of the upper cover body 20 has a plurality of flanges 21, as shown in FIG. 3. The flanges 21 can be retained at the edge of the front phone housing 41 of the mobile phone 40. The front phone housing 41 of the mobile phone 40 can be sheathed in the upper cover body 20, as shown in FIG. 5.

The lower cover body 30 is integrally formed by mold injection of plastic. Patterns, types, or nameplates can be printed on the lower cover body 30. The lower cover body 30 can be joined with a rear phone housing 42 of the mobile phone 40, as shown in FIG. 4. The lower cover body 30 has a gap 31 to retain an antenna 43 of the mobile phone 40, as shown in FIG. 3. A plurality of cavities 32 are disposed beside the gap 31 of the lower cover body 30. The cavities 32 can correspond to an earphone cavity 44, an incoming-call informing light 45 and so on of the mobile phone 40 so that a user can conveniently use the functions of the mobile phone 40.

Finger recessions 33 are respectively disposed at two sides of the lower cover body 30 so that a user can easily unfold the pivotally joined front phone housing 41 and rear phone housing 42 to receive a call or operate the mobile phone 40, as shown in FIG. 6. The finger recessions 33 can also let the user conveniently separate the mobile phone 40 and the lower cover body 30 for performing operations such as replacing a battery (not shown) of the mobile phone 40.

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A plurality of holes **34** are disposed at one side of the lower cover body **30**. The holes **34** can correspond to function keys (not shown) of the mobile phone **40** so that the user can successfully receive a call or set functions.

A bottom of the lower cover body **30** has a slot **35**, which can correspond to a socket **46** (shown in FIG. 5) of the mobile phone **40** so that a user can plug in a power supply (not shown) of the mobile phone **40** to charge or recharge the mobile phone **40**.

As shown in FIG. 7, a different upper cover body **20** and a different lower cover body **30** are matched according to the outer look of a different mobile phone **40** so as to satisfy users having different mobile phones **40**. The connection and disposition ways are the same as the above first embodiment of the present invention.

The present invention uses the upper cover body **20** and the lower cover body **30** to sheathe the mobile phone **40** therein so as to effectively prevent abrasion of the mobile phone **40** due to the carelessness of a user, thereby preventing ill-favored scars on the mobile phone. Moreover, trend and fashion of the mobile phone **40** can be achieved without the need of replacing the mobile phone **40**.

Although the present invention has been described with reference to the preferred embodiments thereof, it will be understood that the invention is not limited to the details thereof. Various substitutions and modifications have been suggested in the foregoing description, and others will occur to those of ordinary skill in the art. Therefore, all such substitutions and modifications are intended to be embraced within the scope of the invention as defined in the appended claims.

The invention claimed is:

1. A protective mask molded for frictional retention to an exterior housing of a mobile phone having user input and output interfaces, and internal components including circuitry and a battery, wherein the exterior housing completely encloses the circuitry and the battery when the mobile phone is fully assembled and ready for use, the exterior housing having an exterior shape formed by a back surface, and at least portions of opposed side surfaces, the protective mask comprising:

an integrally-formed mask body molded and contoured to conform and frictionally-fit tightly against the exterior shape of the exterior housing;

an inner surface of the integrally-formed mask body defining an interior space of the integrally-formed mask body and conforming to and in substantially continuous surface-to-surface contact with the exterior shape of the exterior housing, with no substantial space between the inner surface of the integrally-formed mask body and the exterior shape of the exterior housing;

at least one opening defined by the integrally-formed mask body permitting user access to at least the user input and output interfaces; and

at least one retainer having an extension protruding laterally inward from the integrally-formed mask body and toward and into the integrally-formed mask body interior space, wherein the at least one retainer is retained to the exterior housing at an exterior housing edge when the mask is coupled to the mobile communication device, the at least one retainer participating in retaining the integrally-formed mask body to the mobile communication device.

2. The protective mask of claim **1**, wherein the integrally-formed mask body further includes indicia selected from the group consisting of text, graphic elements and combinations thereof.

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3. The protective mask of claim **1**, wherein the integrally-formed mask body includes at least one feature opening to permit access to at least one feature of the mobile phone.

4. The protective mask of claim **1**, wherein the integrally-formed mask body includes a socket opening corresponding to a socket of the mobile phone and permitting a user to plug a power supply into the socket to charge the mobile phone.

5. A protective mask molded for frictional retention to an exterior housing of, and adapted to be coupled to, a mobile communication device having internal components including circuitry and a battery, wherein the exterior housing completely encloses the circuitry and battery when the mobile communication device is fully assembled and ready for use, and wherein the exterior housing has an exterior shape including a back face and at least portions of opposed side surfaces, the protective mask comprising:

an integrally-formed mask body molded and contoured to conform and frictionally fit to the exterior shape of the exterior housing;

an inner surface of the integrally-formed mask body defining an interior space of the integrally-formed mask body and conforming to and in substantially continuous surface-to-surface contact with the exterior shape of the exterior housing in overlying and protecting relationship, without a substantial gap between the inner surface of the integrally-formed mask body and the exterior shape of the exterior housing, the integrally-formed mask body defining an opening enabling the mask to be placed over the exterior shape in overlying and protecting relationship; and

at least one retainer having an extension protruding laterally inward from the integrally-formed mask body and toward and into the integrally-formed mask body interior space, wherein the at least one retainer is retained to the exterior housing at an exterior housing edge when the mask is coupled to the mobile communication device, the at least one retainer participating in retaining the integrally-formed mask body to the mobile communication device.

6. The protective mask of claim **5**, wherein the mobile communication device includes a socket for battery charging and the integrally-formed mask body defines at least a battery-charging socket opening permitting a power supply to be connected to the socket.

7. The protective mask of claim **5**, wherein the mobile communication device includes an earphone-connection socket and the integrally-formed mask body defines at least one earphone-connection socket opening permitting an earphone to be connected to the earphone-connection socket.

8. A mask for attachment to a hand-held mobile phone, the mobile phone having user input and output interfaces, internal components including circuitry and a battery, and an exterior housing completely enclosing the circuitry and battery when the mobile phone is fully assembled and ready for use, the exterior housing including a first face, a second face and opposed side surfaces there between, the mask comprising:

an integrally-formed mask body molded to conform to a shape of the exterior housing; and

inner and outer surfaces, the surfaces defining at least one opening in the integrally-formed mask body providing access to at least one of the user input and output interfaces, the integrally-formed mask body being configured such that, when the mask is attached to the mobile phone, the integrally-formed mask body is coextensive with, contours to and overlies the opposed

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side surfaces, with substantially no space between the mask body and the opposed side surfaces; and at least one retainer having an extension protruding laterally inward from the integrally-formed mask body and toward and into the integrally-formed mask body interior space, wherein the at least one retainer is retained to the exterior housing at an exterior housing edge when the mask is coupled to the mobile communication device, the at least one retainer participating in retaining the integrally-formed mask body to the mobile communication device.

9. A protective mask molded for frictional retention to an exterior housing of a fully assembled mobile communication device having user input and output interfaces, the mobile communication device further having internal components including circuitry and a battery completely enclosed by the exterior housing, and the exterior housing having an exterior shape formed by a back surface and at least portions of opposed side surfaces, the protective mask comprising:

an inner surface closely conforming to the exterior shape of the exterior housing and in substantially continuous surface-to-surface contact with the exterior shape of the exterior housing, with substantially no space between the inner surface of the protective mask and the exterior shape when the protective mask is retained to the exterior housing, the protective mask being molded, integrally formed, contoured and sized to fit tightly

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against the exterior shape of the exterior housing, thereby providing retention of the protective mask to the exterior housing;

at least one opening defined by the protective mask permitting user access to at least the user input and output interfaces; and

at least one retainer having an extension protruding laterally inward from the integrally-formed mask body and toward and into the integrally-formed mask body interior space, wherein the at least one retainer is retained to the exterior housing at an exterior housing edge when the mask is coupled to the mobile communication device, the at least one retainer participating in retaining the integrally-formed mask body to the mobile communication device.

10. The protective mask of claim 9, wherein the protective mask further includes indicia selected from the group consisting of text, graphic elements and combinations thereof.

11. The protective mask of claim 9, wherein the protective mask includes at least one feature opening to permit access to at least one feature of the mobile communication device.

12. The protective mask of claim 9, wherein the protective mask includes a socket opening corresponding to a socket of the mobile communication device, permitting a user to plug a power supply into the socket to charge the mobile communication device.

* * * * *

EXHIBIT C

TO


**COMPLAINT FOR PATENT
INFRINGEMENT**

Accused Products

MOBILE DEVICE CASE SYLES OF ACCUSED PRODUCTS**

Main Sources:

- <https://rapticstrong.com/>
- <https://rapticstrong.com/collections/iphone-cases>
- <https://rapticstrong.com/collections/samsung>
- https://web.archive.org/web/*/rapticstrong.com*
- https://web.archive.org/web/*/bynoemie.com*
- https://web.archive.org/web/*/defensebrand.com*
- https://web.archive.org/web/*/xdorialife.com*
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- https://web.archive.org/web/*/http://cdn.shopify.com/s/files/1/0115/0272*
- <https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX0DER>
- <https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629>
- <https://www.amazon.com/stores/X-Doria/page/EC7F7157-B87B-43EF-A45B-F474E5F17F45>
- https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARaptic
- https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ANoemie
- <https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0>
- https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories

Case Style Name	Exemplary Photograph(s)
PHONE CASES	
Air (Defense Air)	

** This list is comprehensive, but not exhaustive, of Defendant’s Accused Product Case Styles. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

Case Style Name	Exemplary Photograph(s)
Citadel	
Clear (Defense Clear)	
Clutch	

** This list is comprehensive, but not exhaustive, of Defendant’s Accused Product Case Styles. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

Case Style Name	Exemplary Photograph(s)
Clutch MagSafe	
Dash	
Earth	




** This list is comprehensive, but not exhaustive, of Defendant’s Accused Product Case Styles. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

Case Style Name	Exemplary Photograph(s)
Engage Folio	
Fort MagSafe	
Lux (Defense Lux)	

** This list is comprehensive, but not exhaustive, of Defendant’s Accused Product Case Styles. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

Case Style Name	Exemplary Photograph(s)
Napa Crossbody	
Prime	
Secure	

** This list is comprehensive, but not exhaustive, of Defendant's Accused Product Case Styles. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

Case Style Name	Exemplary Photograph(s)
Secure MagSafe	
Shield (Defense Shield)	
Shield Pro Magnet	

** This list is comprehensive, but not exhaustive, of Defendant’s Accused Product Case Styles. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

Case Style Name	Exemplary Photograph(s)
Shield Wallet	
Slim	
Tactical	

** This list is comprehensive, but not exhaustive, of Defendant's Accused Product Case Styles. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

Case Style Name	Exemplary Photograph(s)
Terrain	
Ultra	
Urban Folio	

** This list is comprehensive, but not exhaustive, of Defendant's Accused Product Case Styles. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

MOBILE DEVICE MODELS* FOR WHICH THERE ARE ACCUSED PRODUCTS**

Main Sources:

- <https://rapticstrong.com/>
- <https://rapticstrong.com/collections/iphone-cases>
- <https://rapticstrong.com/collections/samsung>
- https://web.archive.org/web/*/rapticstrong.com*
- https://web.archive.org/web/*/bynoemie.com*
- https://web.archive.org/web/*/defensebrand.com*
- https://web.archive.org/web/*/xdorialife.com*
- https://web.archive.org/web/*/x-doria.com*
- https://web.archive.org/web/*/http://cdn.shopify.com/s/files/1/0115/0272*
- <https://www.amazon.com/s?me=AHAVX3WWNU4QE&marketplaceID=ATVPDKIKX0DER>
- <https://www.amazon.com/stores/Raptic/page/7B2A3DDC-C4FE-4018-A65E-F2230DBCA629>
- <https://www.amazon.com/stores/X-Doria/page/EC7F7157-B87B-43EF-A45B-F474E5F17F45>
- https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ARaptic
- https://www.walmart.com/browse/3944_542371_133161_1997952?facet=brand%3ANoemie
- <https://www.target.com/c/cell-phone-cases-phones-electronics/raptic/-/N-55n9sZq643leqcob0>
- https://www.bestbuy.com/site/searchpage.jsp?_dyncharset=UTF-8&browsedCategory=abcat0811006&id=pcat17071&iht=n&ks=960&list=y&qp=brand_facet%3DBrand~No%C3%A9mie%5Ebrand_facet%3DBrand~Raptic&sc=Global&st=categoryid%24abcat0811006&type=page&usc=All%20Categories

PHONE MODELS

Apple:

iPhone 5	iPhone X	iPhone 12 Pro Max
iPhone 5s	iPhone XS	iPhone SE 3 (2022)
iPhone 6	iPhone XS Max	iPhone 13 mini
iPhone 6 Plus	iPhone XR	iPhone 13
iPhone 6s	iPhone SE 2 (2020)	iPhone 13 Pro
iPhone 6s Plus	iPhone 11	iPhone 13 Pro Max
iPhone SE 1 (2016)	iPhone 11 Pro	iPhone 14
iPhone 7	iPhone 11 Pro Max	iPhone 14 Plus
iPhone 7 Plus	iPhone 12 mini	iPhone 14 Pro
iPhone 8	iPhone 12	iPhone 14 Pro Max
iPhone 8 Plus	iPhone 12 Pro	

*** This list is comprehensive, but not exhaustive, of Defendant’s Accused Product Models. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

Huawei:

Huawei P10
Huawei P10 Plus

Huawei P10 Lite
Huawei P20

Huawei P20 Lite

Samsung:

Galaxy A01
Galaxy A11
Galaxy A21
Galaxy A33
Galaxy A41
Galaxy A51
Galaxy A53
Galaxy A71
Galaxy A8
Galaxy Note 8
Galaxy Note 9

Galaxy Note 10
Galaxy Note 10+
Galaxy Note 20
Galaxy Note 20 Ultra
Galaxy S8
Galaxy S8+
Galaxy S9
Galaxy S9+
Galaxy S10e
Galaxy S10
Galaxy S10+

Galaxy S20
Galaxy S20+
Galaxy S20 Ultra
Galaxy S21
Galaxy S21+
Galaxy S21 Ultra
Galaxy S22
Galaxy S22+
Galaxy S22 Ultra

*** This list is comprehensive, but not exhaustive, of Defendant's Accused Product Models. Plaintiff reserves the right to supplement this list as further information becomes available during the course of litigation.

RAPTIC Clear Case Compatible with iPhone 12 Pro Max Case, Anti-Yellow Slim Cover, Shock Absorbing Rubber, Scratch Resistant Protective Case, Fits iPhone 12 Pro Max, Blue
<https://rapticstrong.com/collections/iphone-12/products/iphone-12-pro-max-case-raptic-clear?variant=39360229343298>
<https://www.amazon.com/dp/B088KVSWM7?th=1>





Compatibility









X-Doria Raptic Shield, Samsung Galaxy S20 (Formerly Shield) - Military Grade Drop Tested, Anodized Aluminum, TPU, and Polycarbonate Protective Case, Samsung Galaxy S20, Red
<https://rapticstrong.com/collections/samsung-galaxy-s20-series/products/galaxy-s20-case-raptic-shield>
<https://www.amazon.com/dp/B083F5WR91/?th=1>





COMPATIBILITY

S20

S20+

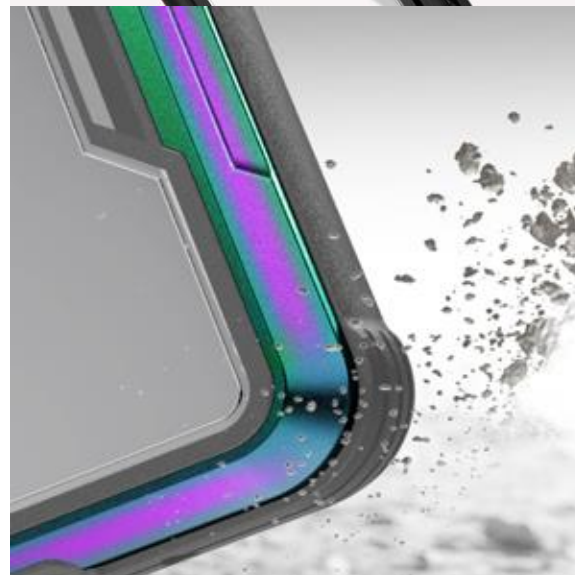
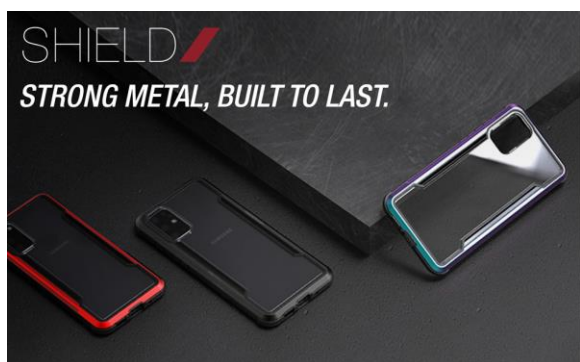
S20 Ultra



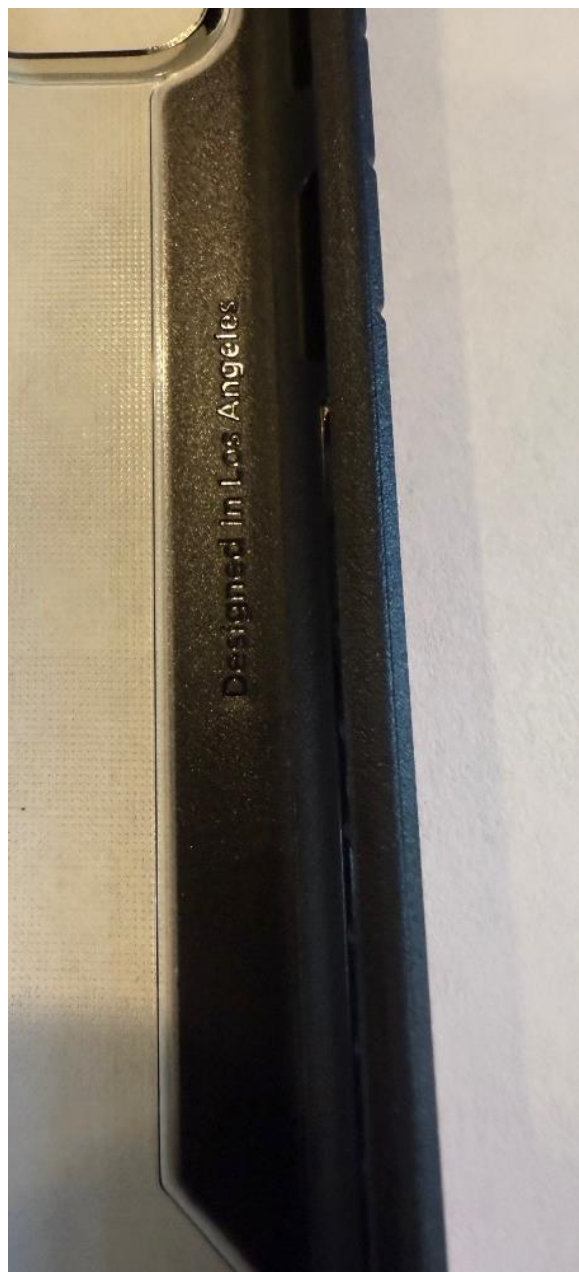
✓ YES

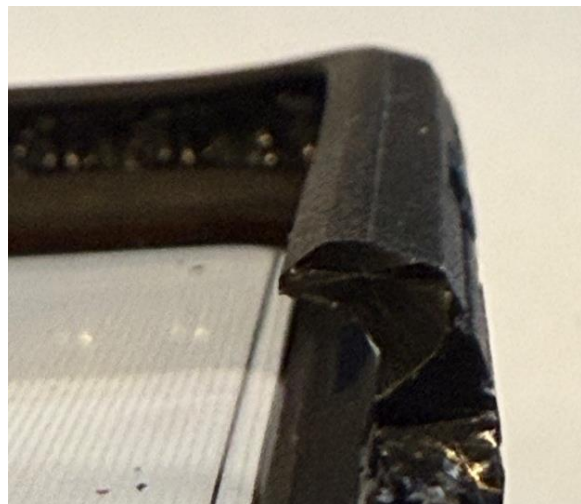
✗ NO

✗ NO









Noémie Apple iPhone 13 Pro Max/iPhone 12 Pro Max Wallet & Crossbody Strap Case
<https://web.archive.org/web/20211022000439/https://bynoemie.com/products/iphone-13-case-napa?variant=40323805511866>
<https://www.target.com/p/no-mie-apple-iphone-13-pro-max-iphone-12-pro-max-wallet-crossbody-strap-case/-/A-86485696?preselect=84829258#lnk=sametab>

