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Wangs Alliance Corporation*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

WANGS ALLIANCE CORPORATION d/b/a  
WAC LIGHTING CO.,

Plaintiff,

v.

CAST LIGHTING LLC,

Defendant.

Case No: 2:20-cv-3710

**COMPLAINT FOR PATENT  
INFRINGEMENT &  
JURY TRIAL DEMAND**

Plaintiff Wangs Alliance Corporation d/b/a WAC Lighting Co. (“WAC Lighting”), by and through its attorneys, alleges the following for its complaint against CAST Lighting LLC (“CAST”).

**PARTIES**

1. Plaintiff WAC Lighting is a New York corporation with its principal place of business located at 44 Harbor Park Drive, Port Washington, New York 11050.

2. Upon information and belief, CAST is a New Jersey limited liability company with its principal place of business at 1120-A Goffle Rd., Hawthorne, NJ 07506.

**NATURE OF THE ACTION**

3. This is a civil action for infringement of United States Patent No. 10,571,101 (“the ‘101 patent”). The action arises under the laws of the United States related to patents, including 35 U.S.C. § 281.

**JURISDICTION AND VENUE**

4. This action arises under the patent laws of the United States, 35 U.S.C. § 271 *et seq.* Accordingly, this Court has exclusive subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. Upon information and belief, this Court has personal jurisdiction over CAST in this action because CAST has committed acts within the District of New Jersey giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over CAST would not offend traditional notions of fair play and substantial justice. CAST, directly and/or through subsidiaries or intermediaries (including distributors, retailers, and others), has committed and continues to commit acts of infringement in this District by, among other things, importing, offering to sell and selling products that infringe the patent-in-suit. Moreover, CAST is a limited liability company formed in this District, and its headquarters are located in this District.

6. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400. CAST resides in New Jersey because New Jersey is its state of registration. CAST also has a regular and established place of business in this District, in Hawthorne, NJ. Consistent with its physical

presence in New Jersey, CAST advertises its presence in this District on its website, for example at <https://cast-lighting.com/landscape-contact>. Further, upon information and belief, CAST has transacted business in this District and has committed acts of direct infringement in this District.

**WAC LIGHTING'S INNOVATION AND  
PROTECTION OF ITS TECHNOLOGY**

7. For over thirty-five years WAC Lighting has operated at the forefront of emerging technologies, producing quality LED lighting solutions that are energy-efficient, long-lasting, and maintenance-free, and promoting green technology.

8. A family company, WAC Lighting is headquartered in the United States. While other manufacturers outsource everything from design and assembly to customer service offshore, WAC Lighting chooses to build its products and customer experience within the company. For many years now, WAC Lighting has been self-sourcing almost all of its products, from research and design to the fabrication of the smallest components within its luminaires.

9. WAC Lighting elevates the industry in design and manufacturing by challenging conventions and building sustainable products responsibly. Over the years, its investment in electronics development, research and test laboratories, and manufacturing facilities has culminated into a unique and unparalleled world-class brand, renowned for quality and ingenuity in the industry. Its award-winning portfolio of architectural products, decorative lighting, and landscape lighting focuses on addressing known problems or meeting unfulfilled needs with lighting solutions in commercial, residential, and hospitality settings.

10. To achieve this success and remain among the industry's leaders, WAC Lighting has been for many years investing in research and developing its own intellectual property.

Instead of acquiring patents from other market players and copying existing products, WAC Lighting has been dedicated to charting its own path of innovation, bringing to the industry new and unique designs and technologies. WAC Lighting's portfolio of patents protects these proprietary designs and technologies. Its patents play an important role in maintaining WAC Lighting's brand and reputation as an innovator and a visionary in the LED luminaire space. WAC Lighting therefore takes protection of its intellectual property very seriously and is determined to put a stop to any unauthorized copying or stealing of its patented technology by others, by any lawful means at its disposal.

11. Among WAC Lighting's innovations are several novel landscape lighting products, which are protected by WAC Lighting's patents. The US Patent Office has already awarded WAC Lighting several patents that cover landscape lighting, and there are several more pending patent applications that are expected to result in issued patents soon.

12. Among WAC Lighting's patents is the '101 patent, entitled "LED Lighting Methods and Apparatus," which was duly issued by the U.S. Patent Office on February 25, 2020. A copy of the '101 patent is attached hereto as Exhibit A.

13. The '101 patent claims, among other things, an LED lighting device comprising: an LED light source; and an LED lighting assembly, said LED lighting assembly including: a driver housing including a dimming control opening in a wall of the driver housing; an LED driver assembly including a resistor component with a rotatable control which provides different resistance values when said rotatable control is rotated to different positions; a circular seal having a hole in the center of the circular seal; a dimming control including a shaft, said shaft extending through the hole in the center of said circular seal and said dimming control opening in

the wall of the driver housing and being in physical contact with the rotatable control of the resistor component, said circular seal sealing between the dimming control and the driver housing; wherein the driver housing includes an upper portion including a flat bottom surface facing toward a top portion of said LED driver assembly, said flat bottom surface including an opening through which at least a first wire extends, said first wire being coupled to said LED driver assembly, said LED driver assembly being located in a lower portion of the driver housing; an insulating layer of insulating material positioned between the flat bottom surface of the upper portion of the driver housing and the top portion of the LED driver assembly; and wherein said LED driver assembly is coupled to said LED light source via the first wire.

14. CAST has been marketing a landscape light SBLABL1 (shown below), which infringes the '101 patent.



15. Upon information and belief, CAST has sold and/or imported the landscape light SBLABL1 and its variations (the “Accused CAST Products”) in the United States through direct sales as well as through distributors and resellers.

16. Upon information and belief, the Accused CAST Products are made in China.

17. WAC Lighting brought this lawsuit against CAST to put a stop to CAST's continuous unauthorized use of WAC Lighting's patented technology and CAST's anti-competitive practices stemming from CAST's infringement of WAC Lighting's intellectual property rights.

**FIRST CLAIM FOR RELIEF**  
**(Patent Infringement of United States Patent No. 10,571,101 by CAST)**

18. The allegations stated in preceding paragraphs are incorporated by reference as though fully set forth herein.

19. WAC Lighting is the owner of the '101 patent.

20. CAST makes, uses, sells, offers to sell, and/or imports the Accused CAST Products, which infringe the '101 patent.

21. The Accused CAST Products contain all of the elements of at least claim 1 of the '101 patent, as arranged in that claim.

22. Specifically, to the extent the preamble is found to be limiting, the Accused CAST Products are an "LED light source." In particular, each of the Accused CAST Products is an LED lighting product.

23. The Accused CAST Products include "an LED lighting assembly." The Accused CAST Products all have components that together comprise an LED lighting assembly.

24. The LED lighting assembly of the Accused CAST Products includes "a driver housing including a dimming control opening in a wall of the driver housing." The Accused CAST Products all include an outer metal casing that houses, among other components, a driver assembly, and that casing has an opening in the back wall to accommodate dimming control.

25. The LED lighting assembly of the Accused CAST Products includes “an LED driver assembly including a resistor component with a rotatable control which provides different resistance values when said rotatable control is rotated to different positions.” The driver housing of the Accused CAST Products houses components that comprise an LED driver assembly. Among such components, there is a resistor with a rotatable control, which provides different resistance values based on the position to which it is rotated.

26. The LED lighting assembly of the Accused CAST Products includes “a circular seal having a hole in the center of the circular seal.”

27. The LED lighting assembly of the Accused CAST Products includes “a dimming control including a shaft, said shaft extending through the hole in the center of said circular seal and said dimming control opening in the wall of the driver housing and being in physical contact with the rotatable control of the resistor component, said circular seal sealing between the dimming control and the driver housing,” because all of these elements are present in the Accused CAST Products, arranged as claimed in the ‘101 patent.

28. The Accused CAST Products include an LED lighting assembly “wherein the driver housing includes an upper portion including a flat bottom surface facing toward a top portion of said LED driver assembly, said flat bottom surface including an opening through which at least a first wire extends, said first wire being coupled to said LED driver assembly, said LED driver assembly being located in a lower portion of the driver housing,” because all of these elements are present in the Accused CAST Products, arranged as claimed in the ‘101 patent.

29. The LED lighting assembly of the Accused CAST Products includes “an insulating layer of insulating material positioned between the flat bottom surface of the upper portion of the driver housing and the top portion of the LED driver assembly,” because all of these elements are present in the Accused CAST Products, arranged as claimed in the ‘101 patent.

30. The Accused CAST Products include an LED lighting assembly “wherein said LED driver assembly is coupled to said LED light source via the first wire,” because all of these elements are present in the Accused CAST Products, arranged as claimed in the ‘101 patent.

31. By making, using, testing, offering for sale, selling, and/or importing the Accused CAST Products CAST has injured WAC Lighting and is liable to WAC Lighting for directly infringing one or more claims of the ‘101 patent, including at least claim 1, pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents.

32. WAC Lighting has been damaged by CAST’s infringement of the ‘101 patent, and is suffering and will continue to suffer irreparable harm and damage as a result of this infringement unless such infringement is enjoined by this Court.

**PRAYER FOR RELIEF**

**WHEREFORE**, for the reasons set forth above, WAC Lighting respectfully requests that this Court enter judgement in its favor, and against CAST, and award relief including, but not limited to, the following:

- A. A judgment that CAST has infringed the ‘101 patent;
- B. An order permanently enjoining CAST from further acts of infringement of the ‘101 patent;

- C. An award of damages adequate to compensate WAC Lighting for all of CAST's unauthorized acts of infringement;
- D. A declaration that this case is exceptional within the meaning of 35 U.S.C. § 285 and an award of WAC Lighting's reasonable attorneys' fees and other costs and expenses incurred in the prosecution of this action;
- E. An award of pre-judgment interest under 35 U.S.C. § 284, and post-judgment interest under 28 U.S.C. § 1961.
- F. An award of any other or further relief as this Court deems just and proper.

**JURY DEMAND**

WAC Lighting demands trial by jury of all issues so triable in this action.

Dated: April 6, 2020

Respectfully submitted,

s/ Jason B. Lattimore

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**CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 11.2**

Pursuant to Local Civil Rule 11.2, I hereby certify under penalty of perjury that, to the best of my knowledge, the matter in controversy is not the subject of any other action pending in any other court or of any pending arbitration or administration proceeding.

Dated: April 6, 2020

s/ Jason B. Lattimore  
Jason B. Lattimore