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Attorneys for Plaintiff
Principal Lighting Group, LLC

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

PRINCIPAL LIGHTING GROUP, LLC,	§	
	§	
<i>Plaintiff,</i>	§	Civil Action No.:
	§	
v.	§	JURY TRIAL DEMANDED
	§	
GENLED, INC. and AGILIGHT, INC.,	§	<i>Document Filed Electronically</i>
	§	
<i>Defendants.</i>	§	
	§	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Principal Lighting Group, LLC (“PLG” or “Plaintiff”), by and through its attorneys, brings this Complaint against GenLED, Inc. (“GenLED”) and AgiLight, Inc. (“AgiLight”), and hereby alleges as follows:

NATURE AND BASIS OF ACTION

1. This is a civil action for infringement arising under the patent laws of the United States at 35 U.S.C. § 1, *et seq.* and 28 U.S.C. § 271, *et seq.*, and with subject matter jurisdiction

afforded this Court under 28 U.S.C. §§ 1331 and 1338(a).

PARTIES, JURISDICTION, AND VENUE

2. PLG is a Delaware corporation and maintains a place of business at 3490 Venture Drive, San Angelo, Texas 76905.

3. On information and belief, GenLED is incorporated in Delaware and has a principal place of business at 320 Murray Hill Pkwy, East Rutherford, NJ 07073. *See* <https://genledbrands.com/agilight/contact/> (listing address for “GLOBAL HQ & AMERICAN SALES”).

4. On information and belief, AgiLight is incorporated in Delaware and has a principal place of business at 320 Murray Hill Pkwy East Rutherford, NJ 07073. *See* <https://genledbrands.com/agilight/contact/> (listing address for “GLOBAL HQ & AMERICAN SALES”).

5. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338 because it arises under the Patent Laws of the United States, United States Code, Title 35.

6. This Court has personal jurisdiction over Defendants because each, directly or through its subsidiaries, divisions, groups, employees, or agents has sufficient minimum contacts with this forum as a result of business conducted within the State of New Jersey. Further, this Court has personal jurisdiction over Defendants in this action because each has a corporate office in this District. Further, each Defendant has committed acts within this District giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice.

7. Venue is proper under 28 U.S.C. § 1400 because of Defendants’ business

locations and activities in this District and also by virtue of Defendants having committed acts of direct and indirect infringement in this District. Specifically, the acts and transactions complained of herein were conceived, carried out, made effective, and had effect within the State of New Jersey and within this District, among other places.

8. Each Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the New Jersey Long Arm Statute, due at least to its substantial business in this forum including but not limited to: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in New Jersey and in this District.

FIRST COUNT

(DEFENDANTS' INFRINGEMENT OF U.S. PATENT NO. 9,311,835)

9. PLG incorporates its allegations in each of the preceding paragraphs.

10. PLG owns, by assignment, U.S. Patent No. 9,311,835 ("the '835 Patent") entitled "Lighting mount for interior-lighted signage and method of retrofitting a lighted sign." A true and correct copy of the '835 Patent is attached hereto as Exhibit 1.

11. There is an actual and justiciable controversy between the parties arising under the Patent Act, 35 U.S.C. § 1, *et seq.* concerning Defendants' infringement of one or more claims of the '835 Patent.

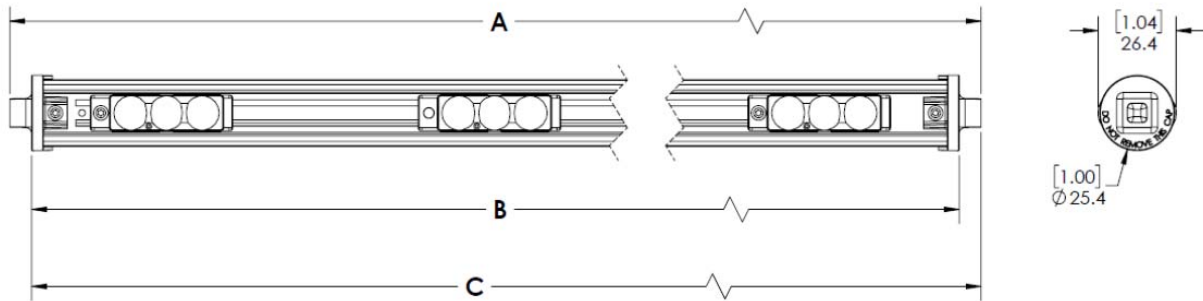
12. Each Defendant, in violation of 35 U.S.C. § 271, has infringed, literally and/or through the doctrine of equivalents, and continues to infringe the '835 Patent by making, using, offering for sale, and/or selling in the United States, and specifically in this District, light support assemblies that fall within the claims of the '835 Patent.

13. Each Defendant has directly infringed at least claim 1 of the '835 Patent under 35

U.S.C. § 271(a) by making, using, offering for sale, and/or selling complete light support assemblies such as the RetroRayz® LED Light Bar and PRO Premium Retrofit Kit “Build A Bar” (“Accused Products”) which as illustrated below incorporate end caps. *See* <https://genledbrands.com/agilight/products/retrorayz/> (attached hereto as Exhibit 2), at 1 (showing end caps); https://genledbrands.com/wp-content/uploads/2021/04/AgiLight_SpecSheet_RetroRayz500_SingleSided_23AUG2021.pdf (attached hereto as Exhibit 3), at 1, 2 (showing end caps); https://genledbrands.com/wp-content/uploads/2022/04/AgiLight_SpecSheet_ProPremiumRetrofitKit_29APR2022.pdf (attached hereto as Exhibit 4), at 1, 2 (referring to “HO End Caps”); <https://genledbrands.com/agilight/product/pro-premium-retrofit-kit/> (attached hereto as Exhibit 5), at 1 (referring to “HO End Caps”).

RetroRayz

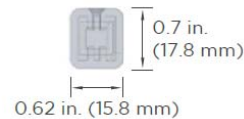




PRO Premium Retrofit Kit

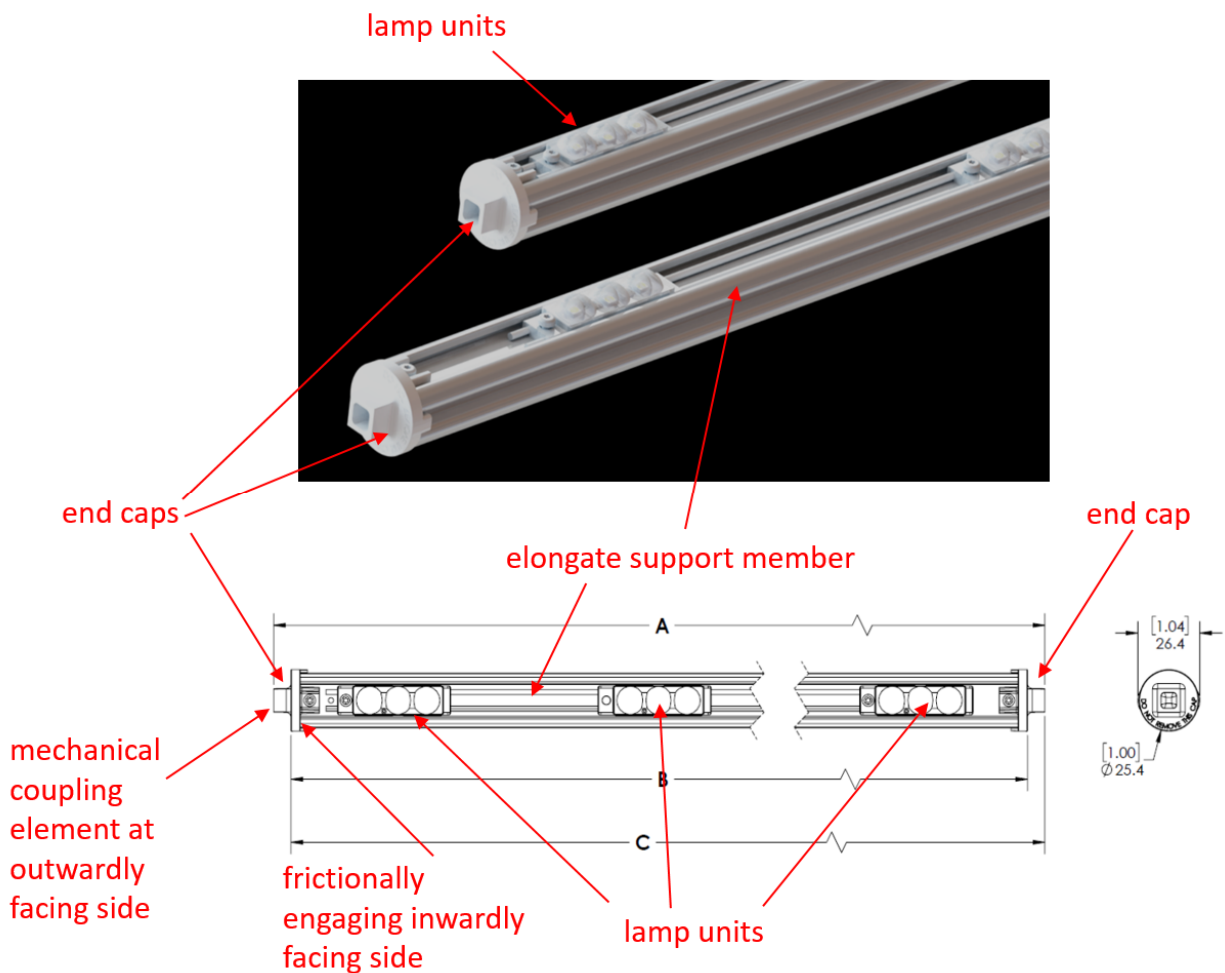


HO End Cap



14. With respect to exemplary claim 1 of the '835 Patent, and as shown in the annotated illustrations below, each Accused Product is a lamp support assembly that has: an elongate support member for supporting a plurality of lamp units; an end cap at each end of the elongate support member, where the inwardly facing side of the cap is configured to frictionally engage with an end of the elongate support member; a mechanical coupling element at the outwardly facing side of the cap configured to engage with a lamp mount, where the mechanical coupling element does not retain any electrical conductors for powering the electric lamp units.

RetroRayz



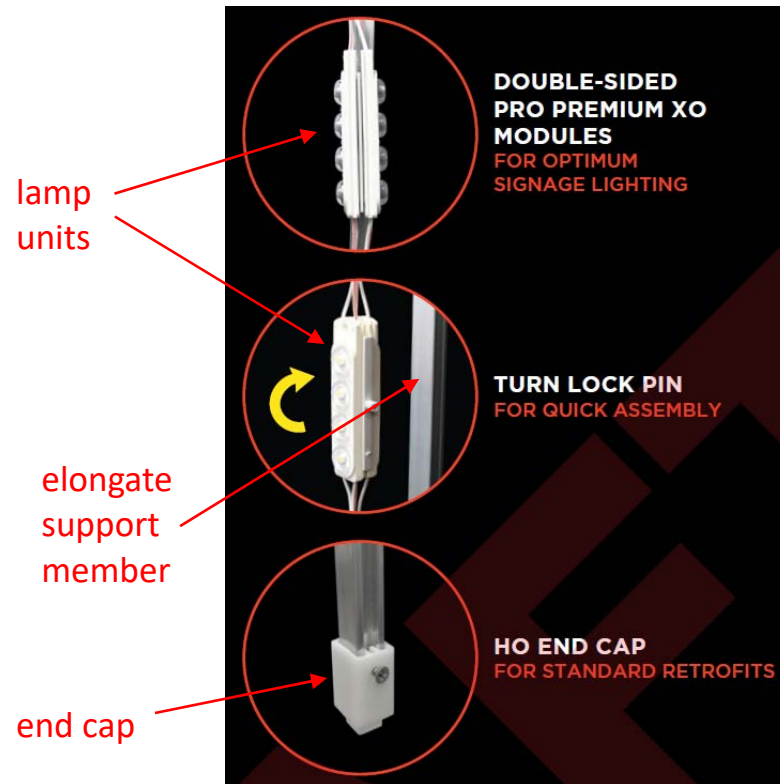
<https://genledbrands.com/agilight/products/retrorayz/> (attached hereto as Exhibit 2);

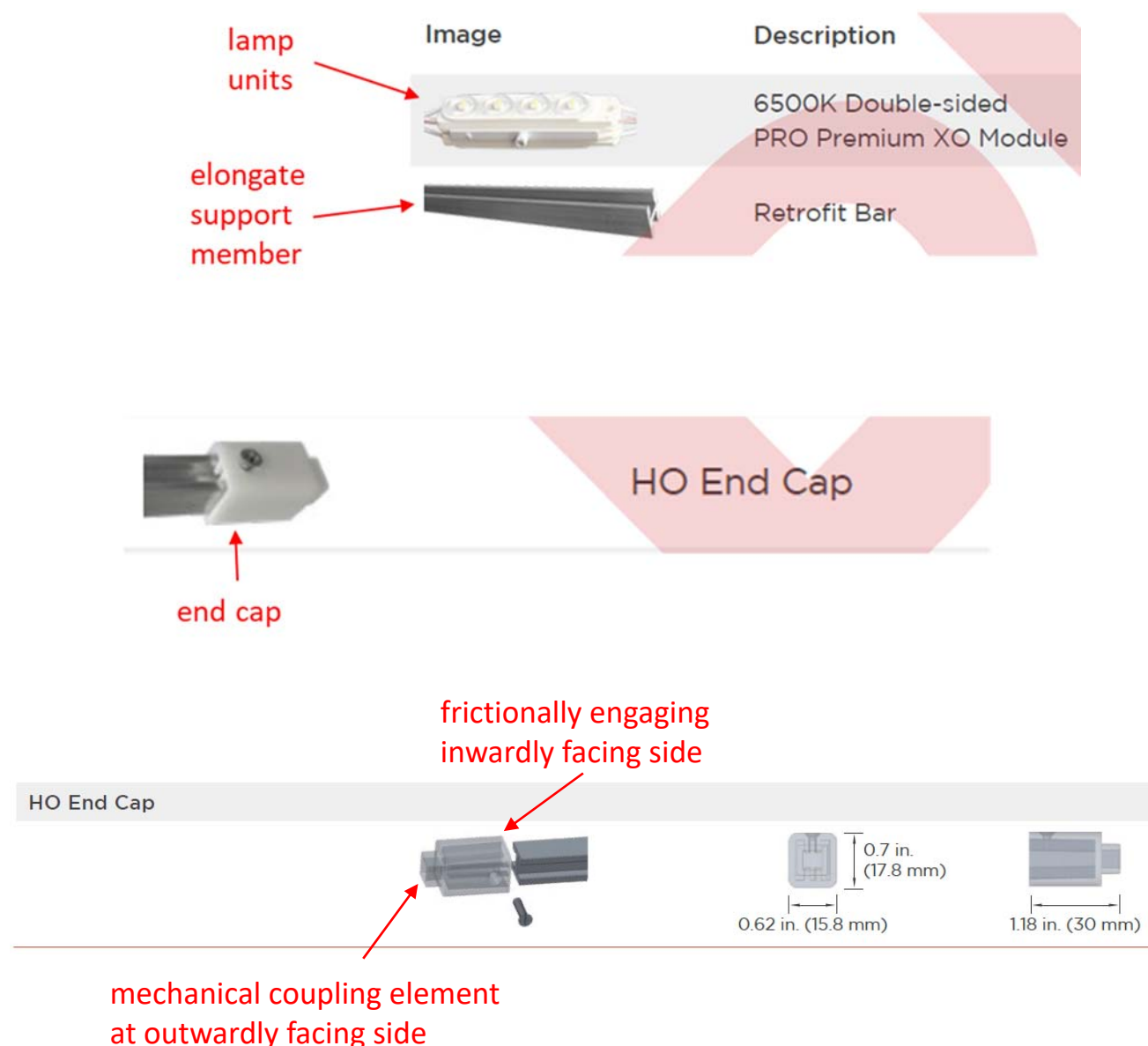
[https://genledbrands.com/wp-](https://genledbrands.com/wp-content/uploads/2021/04/AgiLight_SpecSheet_RetroRayz500_SingleSided_23AUG2021.pdf)

[content/uploads/2021/04/AgiLight_SpecSheet_RetroRayz500_SingleSided_23AUG2021.pdf](https://genledbrands.com/wp-content/uploads/2021/04/AgiLight_SpecSheet_RetroRayz500_SingleSided_23AUG2021.pdf)

(attached hereto as Exhibit 3).

PRO Premium Retrofit Kit





https://genledbrands.com/wp-content/uploads/2022/04/AgiLight_SpecSheet_ProPremiumRetrofitKit_29APR2022.pdf

(attached hereto as Exhibit 4) (stating that a bar can use “two HO End Caps”).

15. On information and belief, each Defendant has indirectly infringed at least claim 1 of the '835 Patent under 35 U.S.C. § 271(b), literally and/or under the doctrine of equivalents, by actively, knowingly, and intentionally inducing infringement of the '835 Patent by others (e.g., Defendants' customers, partners, and/or third parties). In particular, each Defendant

manufactures and/or sells – at a minimum – components of one or more infringing Accused Products which either directly infringe or indirectly infringe when combined with other components of those one or more Accused Products. Defendants actively advertise and encourage users to implement these infringing arrangements. *See, e.g.,*

<https://genledbrands.com/agilight/products/retrorayz/> (attached hereto as Exhibit 2), at 1 (“The RetroRayz® LED Light Bar system provides a cost-effective solution to retrofit cabinet signs with advanced LED technology that never flickers! Quick and easy to install, the RetroRayz® family offers direct replacement for 14 standard fluorescent light sizes.”);

https://genledbrands.com/wp-content/uploads/2021/04/AgiLight_SpecSheet_RetroRayz500_SingleSided_23AUG2021.pdf (attached hereto as Exhibit 3), at 1 (“RETRORAYZ® LED LIGHT BARS — provide a cost-effective solution to replace the linear fluorescent lamps in cabinet signs. With a quick and easy retrofit installation, the end users can switch to LED technology and enjoy its benefits:”);

https://genledbrands.com/wp-content/uploads/2022/04/AgiLight_SpecSheet_ProPremiumRetrofitKit_29APR2022.pdf (attached hereto as Exhibit 4), at 1 (“The revolutionary PRO Premium Retrofit Kit lets you quickly and easily build your own light bars in the field.”);

<https://genledbrands.com/agilight/product/pro-premium-retrofit-kit/> (attached hereto as Exhibit 5).

16. In other words, the components of each Accused Product are designed to be used in conjunction with other components of the Accused Product such as end caps to create an infringing arrangement. These end caps can be used and are intended to be used to frictionally engage ends of elongate support members that support a plurality of electric lamp units (*e.g.,*

LEDs) such as in the Accused Products. Further, these end caps have electrically insulative mechanical coupling elements that do not retain electrical conductors along or through the mechanical coupling elements.

17. On information and belief, each Defendant has indirectly infringed at least claim 1 of the '835 Patent under 35 U.S.C. § 271(c), based on Defendants' marketing and sales of, for example, the Accused Products and/or components. As previously discussed, Defendants knowingly and intentionally advertise and sell the Accused Products to customers with the expectation that customers will form light support assemblies covered by at least claim 1 of the '835 Patent. *See, e.g.*, <https://genledbrands.com/agilight/products/retro-rayz/> (attached hereto as Exhibit 2), at 1 ("The RetroRayz® LED Light Bar system provides a cost-effective solution to retrofit cabinet signs with advanced LED technology that never flickers! Quick and easy to install, the RetroRayz® family offers direct replacement for 14 standard fluorescent light sizes."); https://genledbrands.com/wp-content/uploads/2021/04/AgiLight_SpecSheet_RetroRayz500_SingleSided_23AUG2021.pdf (attached hereto as Exhibit 3), at 1 ("RETRORAYZ® LED LIGHT BARS — provide a cost-effective solution to replace the linear fluorescent lamps in cabinet signs. With a quick and easy retrofit installation, the end users can switch to LED technology and enjoy its benefits: . . ."); https://genledbrands.com/wp-content/uploads/2022/04/AgiLight_SpecSheet_ProPremiumRetrofitKit_29APR2022.pdf (attached hereto as Exhibit 4), at 1 ("The revolutionary PRO Premium Retrofit Kit lets you quickly and easily build your own light bars in the field."); <https://genledbrands.com/agilight/product/pro-premium-retrofit-kit/> (attached hereto as Exhibit 5).

18. As such, each Defendant is liable for contributory infringement of at least claim 1 of the '835 Patent under 35 U.S.C. § 271(a) because each Accused Product is not capable of any substantial non-infringing uses.

19. On information and belief, each Defendant has directly infringed at least claim 1 of the '835 Patent due at minimum to its use of lamp support assemblies as recited in claim 1 of the '835 Patent. *See Exhibits 2-5* attached hereto.

20. On information and belief, each Defendant makes, uses, and sells components or component kits used to make a lamp support assembly as recited in claim 1 of the '835 Patent. Each Defendant instructs others to combine the components in a manner to infringe at least claim 1 of the '835 Patent. *See Exhibits 2-5* attached hereto.

21. Defendants have been on notice of the '835 Patent no later than service of this Complaint, and on information and belief, one or more of the Defendants were aware of the '835 Patent prior to the filing of this suit.

22. Defendants will continue to infringe one or more claims of the '835 Patent unless enjoined by this Court.

23. As a direct and proximate result of Defendants' infringement of the '835 Patent, PLG has been and continues to be damaged in an amount yet to be determined.

24. Defendants directly and/or through their related locations, offices, distribution facilities, and/or branches makes, uses, sells, offers for sale, and/or distributes the Accused Products.

25. On information and belief, the ownership of Defendants derive revenue from the sales of the Accused Products by Defendants and one or more of their related locations, offices, distribution facilities, and/or branches.

26. Unless Defendants' ongoing infringement is enjoined, PLG will suffer irreparable injury for which there is no adequate remedy at law.

27. This is an exceptional case such that PLG should be entitled to its reasonable attorneys' fees and expenses incurred in prosecuting this action and defending any counterclaims brought by Defendants.

PLG'S PRAYER FOR RELIEF

PLG respectfully requests that the Court:

- A. Enter judgment in PLG's favor that each Defendant has infringed the '835 Patent and that such infringement was willful;
- B. Enter an order stating that each Defendant is liable to PLG for damages in an amount not less than recovery of lost profits, a reasonable royalty, treble damages, costs, expenses, and prejudgment and post-judgment interest for Defendants' infringement of the '835 Patent, as provided under 35 U.S.C. § 284;
- C. Enter an order permanently enjoining each Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all other actors acting in active concert therewith from infringing the '835 Patent, as provided under 35 U.S.C. § 283;
- D. Enter an order stating that PLG is a prevailing party and that this is an exceptional case, and thereby award PLG its costs, disbursements, and reasonable attorneys' fees pursuant to 35 U.S.C. § 285 and any other applicable statutes, rules, or common law; and
- E. Grant such other and further relief that the Court deems just and appropriate in law or equity.

PLG'S JURY DEMAND

PLG requests a trial by jury on all issues so triable.

Date: June 27, 2022

Respectfully Submitted,

SAIBER LLC

Attorneys for Plaintiff

Principal Lighting Group, LLC

/s/ Arnold B. Calmann

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LOCAL CIVIL RULE 11.2 CERTIFICATION

Pursuant to Local Civil Rule 11.2, the undersigned counsel for Plaintiff Principal Lighting Group, LLC hereby certifies that this matter in controversy is not the subject of any other action in any other court, or of any pending arbitration or administrative proceeding.

Dated: June 27, 2022

Respectfully submitted,

SAIBER LLC

Attorneys for Plaintiff

Principal Lighting Group, LLC

By: /s/ Arnold B. Calmann

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LOCAL CIVIL RULE 201.1 CERTIFICATION

Under Local Civil Rule 201.1, the undersigned counsel for Plaintiff Principal Lighting Group, LLC hereby certifies that it seeks both monetary damages greater than \$150,000 and injunctive and other equitable relief, and therefore this action is not appropriate for compulsory arbitration.

Dated: June 27, 2022

Respectfully submitted,

SAIBER LLC
Attorneys for Plaintiff
Principal Lighting Group, LLC

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