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17 Attorneys for Plaintiff
18 JLC-TECH LLC

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20 UNITED STATES DISTRICT COURT
21 SOUTHERN DISTRICT OF CALIFORNIA

22 JLC-TECH LLC,
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24 Plaintiff,
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26 v.
27 LUMINOUS GLOBAL INC.,
28
29 Defendant.

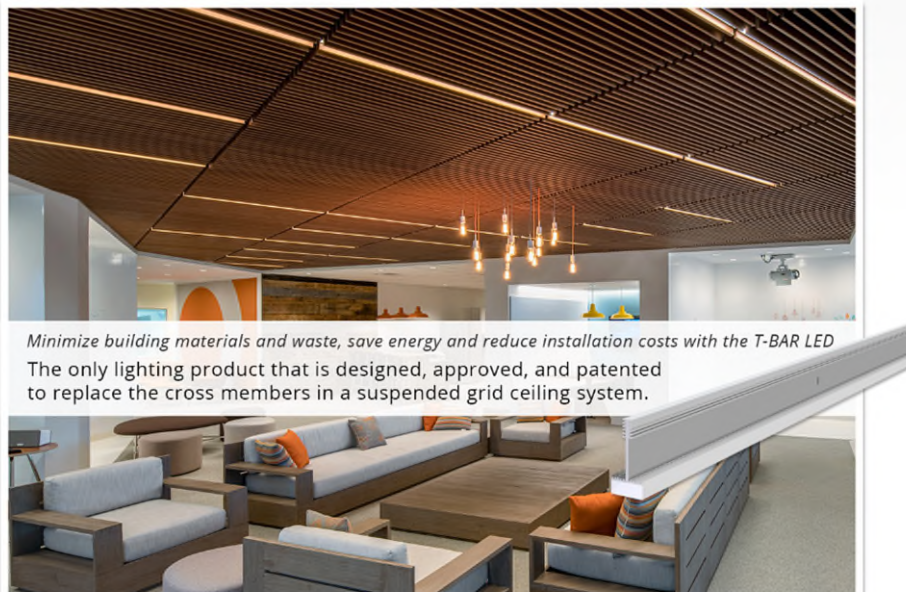
CASE NO. '25CV0015 GPC JLB
**COMPLAINT FOR COPYRIGHT
INFRINGEMENT AND PATENT
INFRINGEMENT**
DEMAND FOR JURY TRIAL

1 Plaintiff JLC-Tech LLC (“JLC”) for its complaint for copyright and patent
2 infringement against Defendant Luminos Global, Inc. (“Luminos Global”), states as
3 follows:

4 **NATURE OF THE CASE**

5 1. For more than 10 years, JLC has been a global leader in unique and
6 useful lighting solutions for commercial spaces. JLC has developed numerous LED
7 lighting fixtures that maximize the energy saving qualities of LEDs and marry them
8 to modern, creative, and structurally integrated designs. As a leading innovator in this
9 area, JLC has received more than 35 patents worldwide for its lighting fixture
10 technologies, including U.S. Patent No. 10,508,805 and U.S. Patent No. 11,732,878.
11 Additionally, JLC has multiple pending patent applications.

12 2. JLC’s investment into its innovation has contributed to the success of its
13 products. In one exemplar, JLC’s patented LED technology replaces the “t-bar” in
14 suspended grid ceilings with a LED light. JLC’s patented LED technology, as
15 installed, appears as follows:



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26 3. On information and belief, Luminos Global is aware of JLC’s issued and
27 pending patent portfolio and copied or imported copies of JLC’s innovative
28 technology rather than independently developing its own products. Luminos Global’s

1 importation, use, sale, and offer for sale of its lighting products infringes JLC’s
2 patented LED technology as claimed in at least U.S. Patent Nos. 10,508,805 and
3 11,732,878. JLC files this suit to stop Luminos Global’s continued patent
4 infringement.

5 4. On information and belief, Luminos Global is aware of JLC’s
6 advertisement materials and copyright portfolio and copied JLC’s advertisement
7 materials rather than independently developing its own. Luminos Global’s copying
8 infringes JLC’s work found in at least JLC’s U.S. Copyright Registration Number VA
9 2-137-244. JLC files this suit to stop Luminos Global’s continued copyright
10 infringement.

11 5. JLC files this patent and copyright infringement action to end Luminos
12 Global’s repeated copying and misuse of JLC’s intellectual property rights.

13 **THE PARTIES**

14 6. JLC-Tech LLC (“JLC” or “Plaintiff”) is a Massachusetts limited liability
15 company, with its principal place of business located at 130 Corporate Park,
16 Pembroke, Massachusetts.

17 7. Upon information and belief, Luminos Global, Inc. (“Luminos Global”
18 or “Defendant”) is a California corporation, and has a principal address at 750 Design
19 Court, Suite 111, Chula Vista, California 91911. On information and belief, Luminos
20 Global’s products are manufactured outside of the United States, shipped into ports
21 in the United States, and subsequently sent to Chula Vista, CA. On information and
22 belief, Luminos Global has been registered to do business in the State of California.
23 Luminos Global has therefore purposefully availed itself of the privilege of
24 conducting business within the State of California and has therefore established
25 sufficient minimum contacts with the State.

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JURISDICTION AND VENUE

8. Subject matter jurisdiction exists pursuant to 28 U.S.C. § 1331 (federal question), and § 1338 (patents). JLC’s claims arise under the patent laws of the United States, including 35 U.S.C. §§ 101 *et seq.* (the Patent Act).

9. The Court has personal jurisdiction over Defendant because it is incorporated in this judicial district, and it has its principal place of business in this judicial district. Upon information and belief, Defendant has also imported, used, sold, or offered for sale its infringing products in California and this judicial district.

10. Upon information and belief, Defendant has committed the tortious acts described in this Complaint in California, and in this judicial district, or otherwise established contacts with this judicial district sufficient to make the exercise of personal jurisdiction proper.

11. Venue is proper in the judicial district pursuant to 28 U.S.C. § 1400(b) because Defendant is a California corporation and thus resides in this judicial district, and because Defendant committed acts of infringement in this judicial district.

12. This action is timely-filed within the applicable statutes of limitation.

FACTUAL BACKGROUND

JLC’s Development of the T-BAR LED®

13. JLC was founded in 2012 with the goal of creating useful and unique LED lighting fixtures that fully integrate into suspended ceiling systems and double as a light and building element.

14. JLC’s founders have more than 50 years of combined experience in the international lighting industry and business management.

15. JLC has invested substantial time, money, and effort developing revolutionary LED lighting fixtures.

16. JLC’s flagship product is the T-BAR LED®.

17. An exemplar of the T-BAR LED® product appears below:

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18. The T-BAR LED[®] replaces the cross members in a grid ceiling system, allowing for the replacement or omission of the usual fluorescent light fixtures in favor of energy saving LED lights.

19. The T-BAR LED[®] reduces job site waste, installation labor and materials, and the amount of building materials needed while increasing acoustics and lighting quality in commercial interior spaces.

20. For example, JLC’s T-BAR LED[®], as installed at the George Bush Intercontinental Airport in Houston, Texas, is depicted below:



1 **JLC’s Intellectual Property**

2 ***Copyrights***

3 21. As part of its advertising and marketing efforts, JLC uses photographs
4 and photographic renderings on its website and in physical brochures to advertise and
5 market its T-BAR LED™ product.

6 22. One brochure was the “May 2018 T-BAR LED (Linear Lighting)
7 Technical Brochure.” JLC published this brochure in May 2018, and JLC used it and
8 many of the rendered photographs contained therein on its website and/or in electronic
9 and physical marketing messaging. A true and accurate copy of this brochure is
10 attached as Exhibit 1.

11 23. On July 18, 2018 the U.S. Copyright Office issued JLC a copyright
12 registration for the work entitled “May 2018 T-BAR LED (Linear Lighting) Technical
13 Brochure,” Registration Number VA 2-137-244. A true and accurate copy of the
14 registration certificate is attached as Exhibit 2.

15 24. The brochure identified above will be identified as “JLC Protected
16 Work” in this Complaint.

17 25. JLC owns all rights, title, and interest in the copyrights for the JLC
18 Protected Work, including for the rendered photographs, images, and text contained
19 therein.

20 ***Patents-in-Suit***

21 26. On December 17, 2019, the United States Patent & Trademark Office
22 duly and legally issued U.S. Patent No. 10,508,805 (“the ’805 Patent”), titled “T-Bar
23 for Suspended Ceiling with Heat Dissipation System for LED Lighting”.

24 27. A true and accurate copy of the ’805 Patent is attached as Exhibit 3.

25 28. The ’805 Patent is valid and its claims enforceable.

26 29. JLC is the owner of all rights, title, and interest in the ’805 Patent.

27 30. JLC has not authorized Defendant or its customers to manufacture, offer
28 to sell, sell, use, or import any product or method covered by the ’805 Patent.

1 31. On August 22, 2023, the United States Patent & Trademark Office duly
2 and legally issued U.S. Patent No. 11,732,878 (“the ’878 Patent”), titled “T-Bar for
3 Suspended Ceiling with Heat Dissipation System for LED Lighting”.

4 32. A true and accurate copy of the ’878 Patent is attached as Exhibit 4.

5 33. The ’878 Patent is valid and its claims enforceable.

6 34. JLC is the owner of all rights, title, and interest in the ’878 Patent.

7 35. JLC has not authorized Defendant or its customers to manufacture, offer
8 to sell, sell, use, or import any product or method covered by the ’878 Patent.

9 **Defendant’s Infringing Conduct**

10 36. Upon information and belief, Luminos Global is and has been engaging
11 in activities that infringe JLC’s intellectual property rights.

12 37. Luminos Global operates a website located at the luminosglobal.com
13 domain.

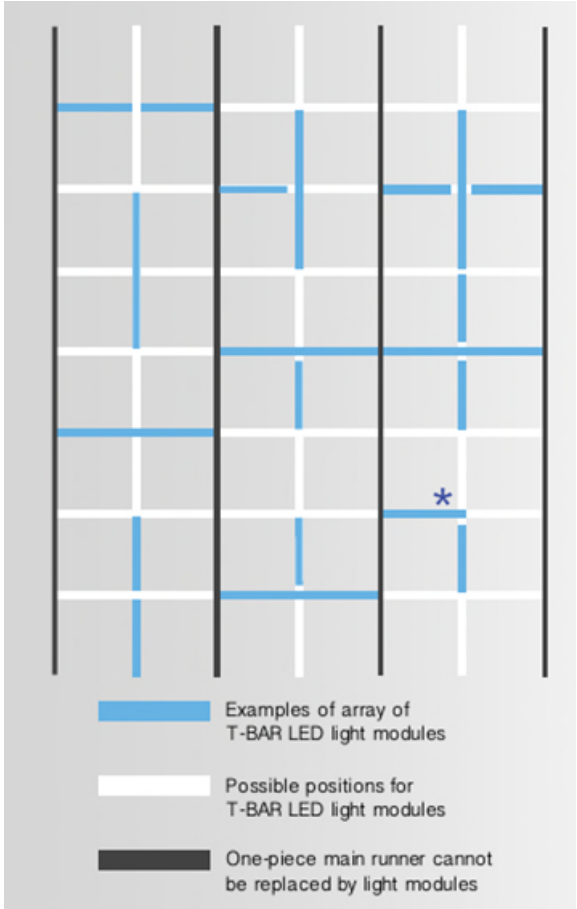
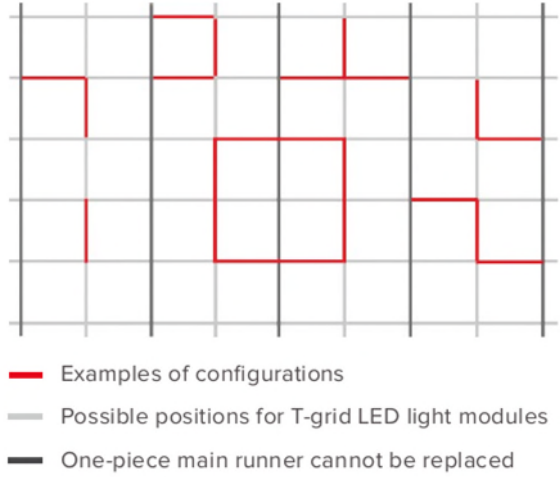
14 38. From this website, Luminos Global offers LED lighting and LED
15 lighting accessories for sale to the public, and will ship orders to customers who
16 purchase items through the website to locations throughout the United States.

17 39. On its luminosglobal.com domain, Luminos Global offers a product
18 referred to as the “T-SLIM Series.”

19 40. Luminos Global hosts a product webpage for the “T-SLIM Series
20 Innovative Linear Light” at [https://luminosglobal.com/products/t-slim-series-
21 innovative-linear-light/](https://luminosglobal.com/products/t-slim-series-innovative-linear-light/). A specification sheet promoting the “T-SLIM Series”
22 products is accessible from this product webpage and downloadable as
23 “T-Slim_Series_Spec_Sheet_04-28-23”. A true and accurate copy of Defendant’s
24 “T-Slim_Series_Spec_Sheet_04-28-23” is attached as Exhibit 5 (last accessed
25 December 30, 2024).

26 41. Defendant copied Plaintiff’s rendered images and text contained in JLC
27 Protected Work, for its “T-Slim_Series_Spec_Sheet_04-28-23”.
28

1 42. Defendant’s copying, reproduction, distribution, display, creation of
 2 derivative works, and use of the rendered images and text is shown below, alongside
 3 the corresponding image contained in the JLC Protected Work.

JLC’s Protected Work	Luminos Global's Infringing Use in the “T-Slim_Series_Spec_Sheet_04-28-23”
<p data-bbox="284 562 857 657">T-BAR LED can be installed in many configurations by replacing any of the cross tees between the main runners of the grid ceiling assembly.</p> <p data-bbox="375 716 831 753">(JLC’s Protected Work, p. 41)</p>	<p data-bbox="889 558 1515 657">T-SLIM LED can be installed in many configurations by replacing any of the cross tees between the main runners of the grid ceiling assembly.</p>
 <p data-bbox="375 1759 831 1797">(JLC’s Protected Work, p. 41)</p>	 <p data-bbox="911 1230 1455 1339"> — Examples of configurations — Possible positions for T-grid LED light modules — One-piece main runner cannot be replaced </p>

1 43. Upon information and belief, Defendant has and continues to
 2 manufacture, offer for sale, sell, import, and/or use, including without limitation, its
 3 “T-SLIM Series” linear light (the “T-SLIM”) product within and into the United
 4 States.

5 44. Exemplars of the T-SLIM product as viewed on Luminos Global’s
 6 website and/or Luminos Global’s promotional and/or instructional materials, are
 7 shown below:

**T-SLIM Series
 Innovative Linear Light**



- Highlights:**
- 50,000 Hours
 - 5 Year Warranty
 - 0-10V Dimmable
 - CCEA Approved Option
 - Up to 130 Lumens per Watt
 - 2FT & 4FT Options Available
 - Chicago Plenum Rated Option
 - Emergency Back Up Available
 - Can Be Connected in Continuous Rows

- Applications:**
- Lobbies
 - Offices
 - Hotels

Please contact us for more information

PRODUCTS / INTERIOR LIGHTING / Architectural Linear / T-SLIM Series - Innovative Linear Light



**T-Slim Series
 Linear**

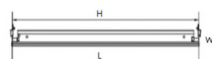


PROJECT NAME _____
 FIXTURE TYPE _____
 CATALOG NUMBER _____
 ADDITIONAL NOTES _____

Features

- Up to 110 Lumens per Watt
- CCT Option: 3500° K, 4000° K
- 50,000 Hours, 5 Year Warranty
- One Driver Connects 3 Lamps
- Emergency Back Up Available
- Chicago Plenum Rated Option
- Architectural Dimmable 0-10V Lighting
- Can be Connected in Continuous Rows

Dimensions



Applications

- Hotels
- Offices
- Lobbies



**T-SLIM Series
 Innovative Linear Light**

Applications

- Hotels
- Offices
- Lobbies

Highlights

- 50,000 Hours
- 5 Year Warranty
- 0-10V Dimmable
- CCEA Approved Option
- Up to 130 Lumens per Watt
- 2FT & 4FT Options Available
- Chicago Plenum Rated Option
- Emergency Back Up Available
- Can Be Connected in Continuous Rows



Model	L	W	H
T-SLIM-2 (15/16")	23.96"	0.69"	0.48"
T-SLIM-2 (9/16")	23.90"	0.69"	0.48"
T-SLIM-4 (15/16")	47.94"	0.69"	0.48"
T-SLIM-4 (9/16")	47.90"	0.69"	0.48"

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PROJECT NAME _____
FIXTURE TYPE _____
CATALOG NUMBER _____
ADDITIONAL NOTES _____

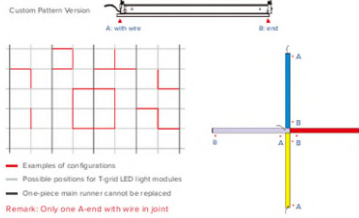
T-SLIM Series 
Luminos
Innovative Linear Light

Custom Pattern (Only for LGL-T-SLIM-9 and LGL-T-SLIM-15)



T-SLIM LED can be installed in many configurations by replacing any of the cross bars between the main runners of the grid ceiling assembly.

It is free to create competing specs, and your laser no longer has to be restricted to a single pattern on the ceiling. Custom pattern such as "L", "T", "+", "X", etc.



Innovative Linear Light
T-Slim Series



Seamless continuous rows

Slim profile 0.48" thickness integrated to the T-grid ceiling

2FL 4FT size available

Details

- CRI 80+
- IC rated: Yes
- 50,000 hours
- 5 year warranty
- Damp rated: Yes
- Power factor: >0.9
- Up to 500 lumens per watt
- Mounting options: Recessed
- Dimming options: 0-10V, 12%-100%
- Can be connected in continuous rows
- CCT options: 3,000K, 3,500K*, 4,000K*, 5000K




750 Design Ct, Suite 111, Chula Vista, CA 91911 info@luminosglobal.com www.luminosglobal.com (619) 781-8650 

Innovative Linear Light
T-Slim Series



How can our T-Slim solve your lighting needs?

750 Design Ct, Suite 111, Chula Vista, CA 91911 info@luminosglobal.com www.luminosglobal.com (619) 781-8650 

45. Upon information and belief, Defendant’s T-SLIM Series of linear lights includes, without limitation, T-SLIM products labeled with Model Nos. LGL-T-SLIM-9, LGL-T-SLIM-S, LGL-T-SLIM-I, LGL-T-SLIM-15, and typical options thereof, as viewed on Luminos Global’s website and/or Luminos Global’s promotional materials, and all other similar products (collectively, the “Accused Products”).

46. True and accurate copies of Defendant’s advertisement brochures for its T-SLIM products are attached as Exhibits 5 and 6.

47. True and accurate copies of Defendant’s installation manual for its T-SLIM products are attached as Exhibit 7.

1 48. A true and accurate copy of Defendant’s advertising brochure for its
2 global offering of products, including T-SLIM products (pages 26-29), is attached as
3 Exhibit 8.

4 49. True and accurate copies of Defendant’s website are attached as Exhibits
5 9 and 10.

6 50. On its website, Luminos Global offers its Accused Products for sale.

7 51. Defendant’s website posting is an offer for sale within the meaning of
8 the patent statutes, including 35 U.S.C. § 271.

9 52. The Accused Products, and use of the Accused Products, embody the
10 inventions patented in the ’805 and ’878 Patents.

11 53. The Accused Products are not staple articles of commerce.

12 54. The Accused Products are not suitable for substantial non-infringing use.

13 55. Upon information and belief, Defendant imports the Accused Products
14 into the United States from Shenzhen OKT Lighting Co., Ltd.

15 56. Upon information and belief, Luminos Global has also offered for sale
16 and/or sold the Accused Products for uses and/or installations in the United States,
17 including a job named IMI HQ located in Indianapolis, Indiana.

18 57. For the reasons set forth herein, upon information and belief,
19 Defendant’s Accused Products infringe one or more claims of the ’805 Patent, and
20 one or more claims of the ’878 Patent.

21 58. Luminos Global’s conduct caused and will continue to cause JLC
22 irreparable harm, for which it has no adequate remedy at law.

23 59. JLC brings this action to recover for the injury and damages Luminos
24 Global has caused it, and to stop Luminos Global from infringing its intellectual
25 property in the future.

26 **Luminos Global’s Infringement is Willful**

27 60. JLC’s website discloses the patents that cover the commercial
28 embodiments of its inventions.

1 61. JLC marks its products, including the T-BAR LED[®] within the meaning
2 of the patent marking statute, including 35 U.S.C. § 287.

3 62. JLC’s website (<https://www.jlc-tech.com/patents/>) informs website
4 visitors and users that its T-BAR LED[®] product is covered by, among others, the ’805
5 and ’878 Patents:

The screenshot shows the T-BAR LED[®] logo at the top left. To its right, the text reads "Is protected under the following patents:". Below the logo, a list of features is shown in bold, with corresponding patent numbers and jurisdictions listed to the right. At the bottom, it says "Additional patents are pending.".

Feature	Patent Information
Diffusing lens	8,177,385 (US)
Cut-Off Reflector	9,879,850 (US)
Multi-Reflector	10,508,805 (US)
Asymmetric*	11,175,031 (US)
Block Clear Diffusing Lens	D834,238 (US)*
Block Frosted Diffusing Lens	178048 (CA)*
Directional Signage	3,061,756 (CA)*
Available options: PoE, IP65, Chicago Plenum,	004481000-0001 (EP)*
Partially concealed grid**, 4L [®] Model	D834,239 (US)**
	178047 (CA)**
	004481000-0002 (EP)**
	D881,450 (US)
	F2017/01757 (ZA)*
	10,222,049 (US)*
	F2017/01756 (ZA)**
	2019/07953 (ZA) *
	11,732,878 (US)

Additional patents are pending.

14 63. Because JLC’s website discloses the ’805 and ’878 Patents, and
15 Defendant, upon information and belief, has viewed portions of JLC’s website,
16 Defendant is aware, or should have been aware, of the ’805 and ’878 Patents.

17 64. Defendant has had constructive knowledge of the ’805 and ’878 Patents
18 at least through JLC’s compliance with the marking requirements of 35 U.S.C. § 287
19 upon each JLC’s T-BAR LED[®] product and JLC’s website.

20 65. Defendant also has had actual knowledge of the ’805 and ’878 Patents
21 since at least the date on which Luminos Global received letters sent by JLC’s
22 counsel.

1 66. Thus, upon information and belief, Defendant’s infringement of the ’805
2 and ’878 Patents is willful.

3 67. Defendant’s infringement is further willful because, upon information
4 and belief, Defendant substantially copied JLC’s T-BAR LED®.

5 68. The Accused Products are especially made or especially adapted for use
6 in an infringement of the ’805 and ’878 Patents. The Accused Products include LED
7 lighting fixtures configured only for purposes of attachment with grid ceiling
8 installations.

9 69. Upon information and belief, Defendant knows that the Accused
10 Products are not staple articles of commerce, are not suitable for substantial non-
11 infringing use, and are especially made or adapted for use in a manner that infringes
12 JLC’s patent rights.

13 70. Defendant’s conduct has injured and damaged JLC and will continue to
14 injure and damage JLC.

15 **Request for Permanent Injunctive Relief**

16 71. JLC has no adequate remedy at law available to stop Luminos Global’s
17 continuing unlawful conduct. Unless restrained, Defendant will continue to violate
18 JLC’s rights, abuse and dissipate JLC’s goodwill, and unlawfully use, possess, and
19 exploit JLC’s intellectual property.

20 72. Likewise, the balance of the harm favors JLC, and an injunction would
21 be in the public’s interest. Luminos Global has willfully engaged in, and upon
22 information and belief, continues to willfully engage in the acts complained of in
23 conscious disregard of JLC’s rights.

24 **FIRST CLAIM**

25 **COPYRIGHT INFRINGEMENT**

26 **Infringement of JLC’s Protected Works under 17 U.S.C. § 501, et seq.**

27 73. JLC incorporates by reference, as if fully set forth herein, Paragraphs 1-
28 72 of this Complaint.

1 74. Upon information and belief, Defendant, without license or authorization
2 from JLC, copied, reproduced, distributed, displayed, made derivative works of, and
3 used the photographic renderings contained in the JLC Protected Works, and
4 continues to do so now.

5 75. Defendant’s wrongful actions described herein constitute multiple
6 violations of 17 U.S.C. § 501, *et seq.*

7 76. Upon information and belief, Defendant’s copyright infringement was
8 willful because the photographs it copied, reproduced, distributed, displayed, made
9 derivative works of, and used were JLC Protected Works and obtained from Plaintiff’s
10 website and/or brochures.

11 77. JLC has been injured and damaged, and will continue to be injured and
12 damaged by Defendant’s copyright infringement.

13 78. JLC has incurred and will continue to incur attorney’s fees, costs, and
14 expenses in this action.

15 **SECOND CLAIM**

16 **PATENT INFRINGEMENT**

17 **Direct and Indirect Infringement of U.S. Patent No. 10,508,805**

18 **(“the ’805 Patent”) under 35 U.S.C. § 271**

19 79. JLC incorporates by reference, as if fully set forth herein, Paragraphs 1-
20 78 of this Complaint.

21 80. Upon information and belief, Defendant uses, offers for sale, sells,
22 and/or imports the Accused Products into the United States.

23 81. Claim 1 of the ‘805 Patent is set forth as follows:

24 82. A T-bar for a suspended ceiling, the T-bar comprising:

25 83. an elongated rigid spine extending from a first terminal end to a second
26 terminal end;

27 84. a fixed anchor attached to the elongated rigid spine on at least one of the
28 first or second terminal ends;

1 85. a lower portion of the elongated rigid spine including a first rest shelf
2 portion and a second rest shelf portion, the first rest shelf portion extending from the
3 elongated rigid spine in a first lateral direction, the second rest shelf portion extending
4 from the elongated rigid spine in a second lateral direction, the second lateral direction
5 being opposite the first lateral direction, the first and second rest shelf portions and
6 elongated rigid spine forming a cross-sectional form of the T-bar from the first
7 terminal end to the second terminal end, the cross-sectional form of the T-bar
8 configured for placement of the suspended ceiling above the lower portion of the
9 elongated rigid spine;

10 86. at least one light source adjacent a bottom side of each the first and
11 second rest shelf portion and attached to the first or second rest shelf portion;

12 87. a light source covering adapted and configured to cover the at least one
13 light source and to be located below the first and second rest shelf portions, the light
14 source covering configured to allow passage of light illuminating from the light
15 source through the light source covering; and

16 88. a first side wall extending downward from a bottom side of the first rest
17 shelf portion and extending from a first terminal end of the first rest shelf portion to a
18 second terminal end of the first rest shelf portion, and a second side wall extending
19 downward from a bottom side of the second rest shelf portion and extending from a
20 first terminal end of the second rest shelf portion to a second terminal end of the
21 second rest shelf portion, the first and second side walls and the bottom sides of the
22 first and second rest shelf portions forming a light housing to contain the at least one
23 light source of the T-bar.

24 89. Luminos Global directly and/or indirectly infringes the claims of the
25 '805 Patent, including, but not limited to, claim 1.

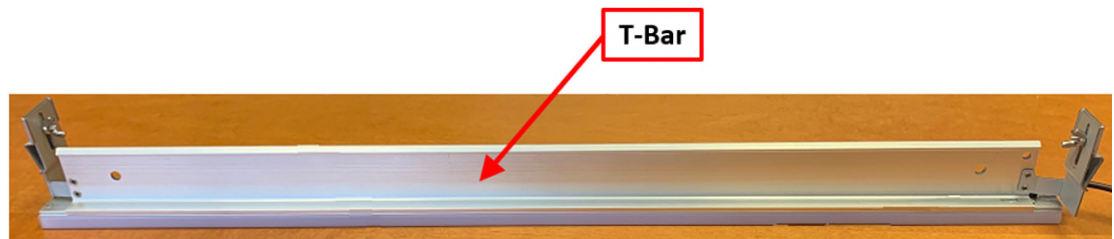
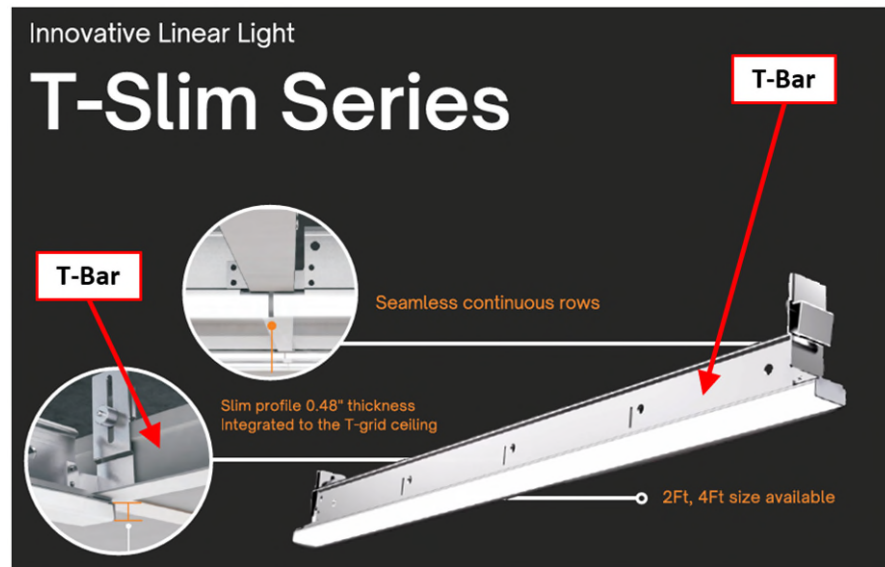
26 90. Upon information and belief, representative images illustrating examples
27 of the Accused Products offered by Luminos Global are viewed below.
28

1 91. These representative images for the Accused Products are presented with
2 respect to claim 1 of the '805 Patent.

3 92. JLC reserves the right to amend/supplement these representative images
4 for the Accused Products with further charts/illustrations for all infringed claims of
5 the '805 Patent, including claim 1 as viewed below.

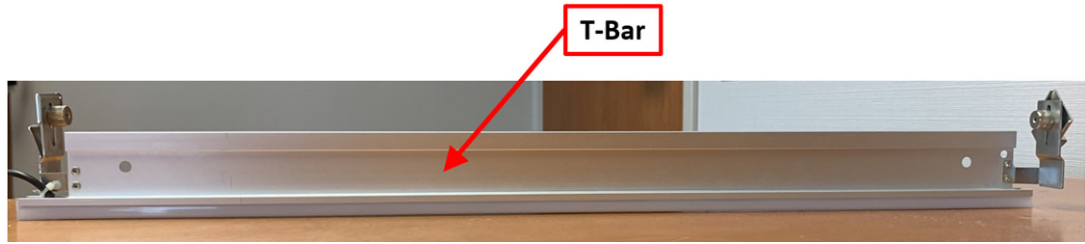
6 93. The Accused Products are T-bars for a suspended ceiling.

7 94. Upon information and belief, the Accused Products shown in Exhibit 5
8 and the accompanying representative image are T-bars for suspended ceilings. The
9 below representative image illustrates one type of the Accused Products, which is
10 available for purchase and suitable for use in a grid ceiling environment (annotations
11 added).



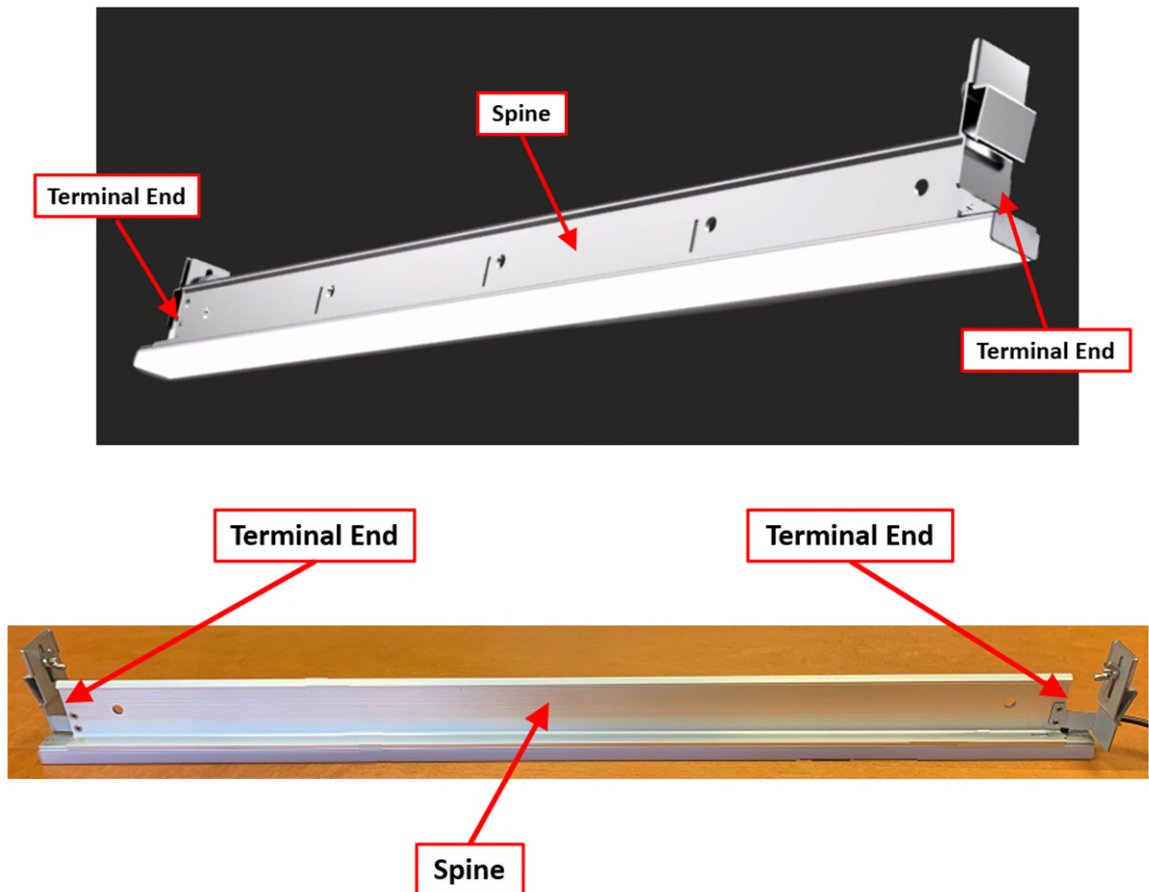
22 95. Upon information and belief, the Accused Products as shown below in
23 the accompanying representative image are also T-bars for suspended ceilings. The
24 below representative image illustrates a second type of the Accused Products, which
25

1 is available for purchase and suitable for use in a grid ceiling environment
2 (annotations added).

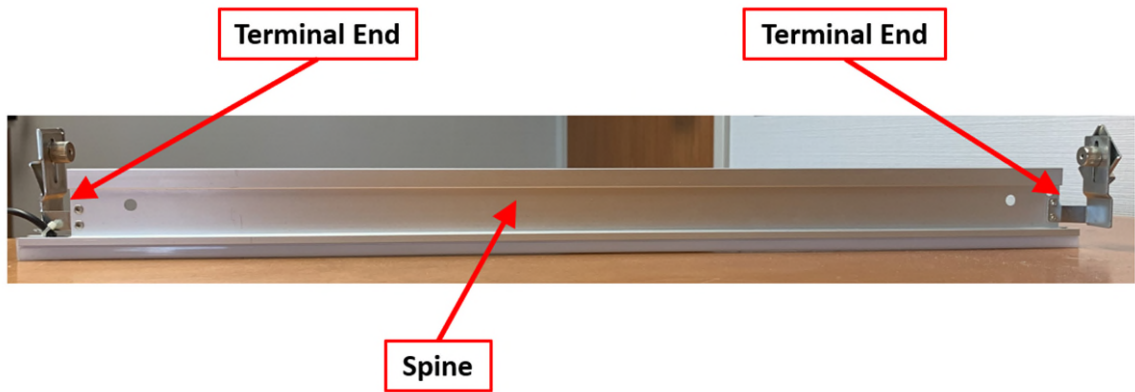


7
8 96. The Accused Products include an elongated rigid spine extending from
9 a first terminal end to a second terminal end.

10 97. Upon information and belief, one type of the Accused Products shown
11 in Exhibit 6, and the below accompanying representative image, include an elongated
12 rigid spine extending from a first terminal end to a second terminal end (annotations
13 added).

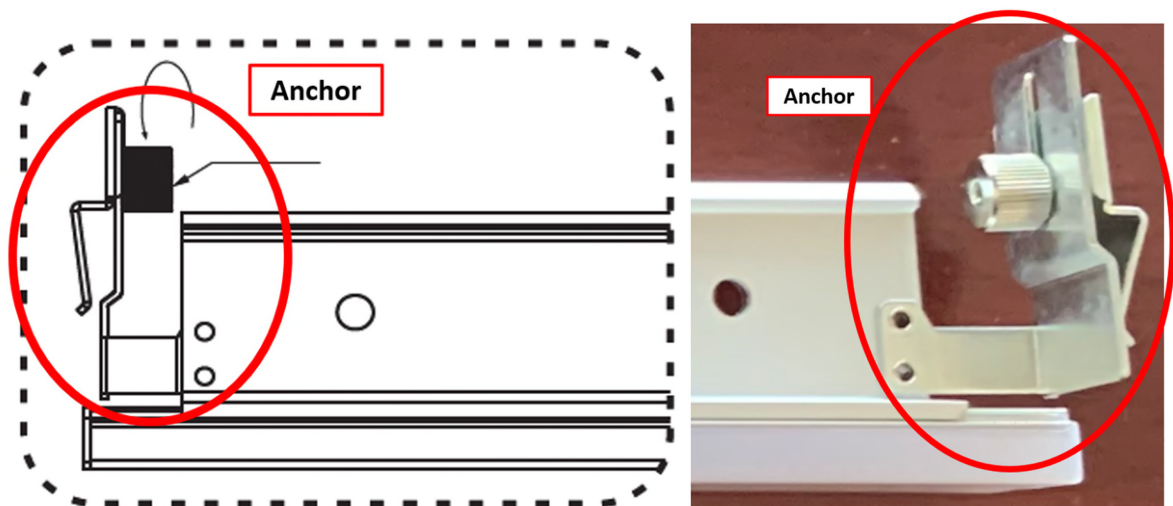


1 98. Upon information and belief, the second type of the Accused Products,
2 as shown below in the accompanying representative image, include an elongated rigid
3 spine extending from a first terminal end to a second terminal end (annotations
4 added).



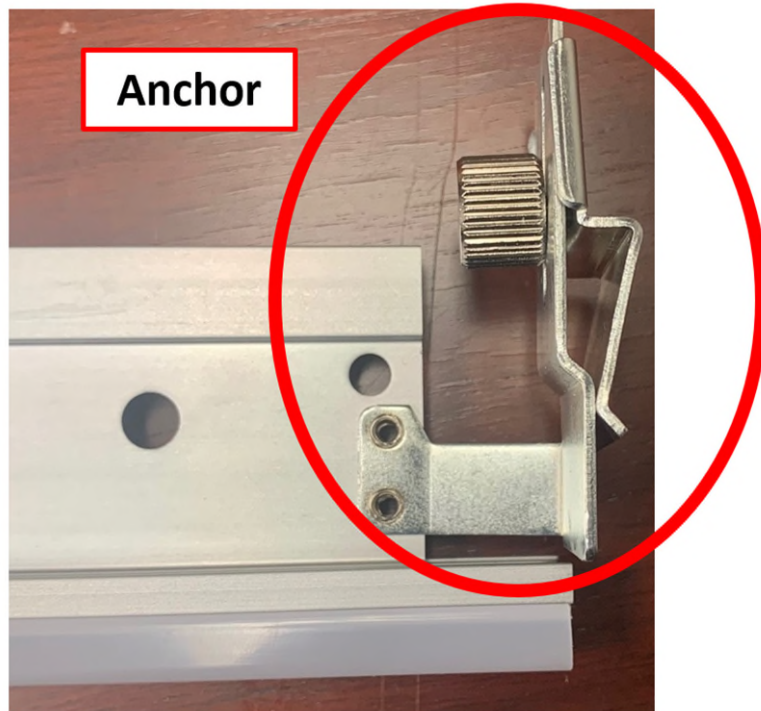
12 99. The Accused Products include a fixed anchor attached to the elongated
13 rigid spine on at least one of the first or second terminal ends.

14 100. Upon information and belief, the Accused Products shown in Exhibit 7,
15 and the below accompanying representative image, include a fixed anchor attached to
16 the elongated rigid spine on at least one of the first or second terminal ends
17 (annotations added).



27 101. Upon information and belief, a second type of the Accused Products, as
28 shown below in the accompanying representative image, include a fixed anchor

1 attached to the elongated rigid spine on at least one of the first or second terminal ends
2 (annotations added).

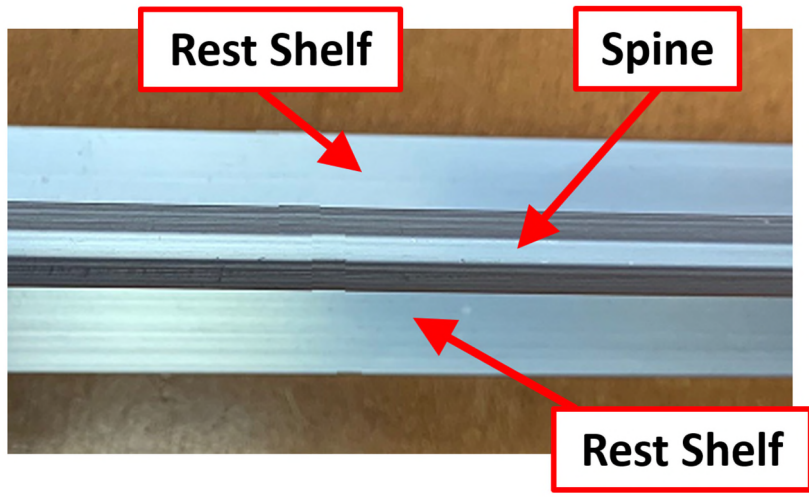
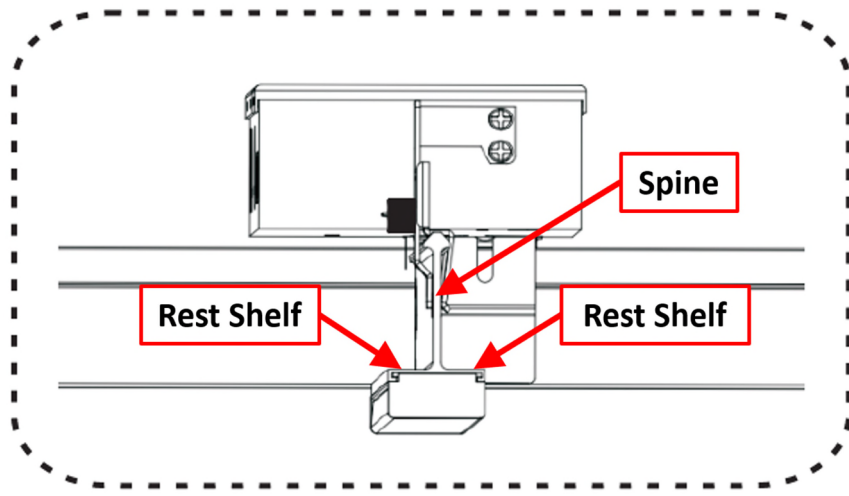


15 102. The Accused Products include a lower portion of the elongated rigid
16 spine with a first rest shelf portion and a second rest shelf portion, the first rest shelf
17 portion extending from the elongated rigid spine in a first lateral direction, the second
18 rest shelf portion extending from the elongated rigid spine in a second lateral
19 direction, the second lateral direction being opposite the first lateral direction.

20 103. Upon information and belief, one type of the Accused Products shown
21 in Exhibit 7, and the below accompanying representative image, includes a lower
22 portion of the elongated rigid spine with a first rest shelf portion and a second rest
23 shelf portion, the first rest shelf portion extending from the elongated rigid spine in a
24 first lateral direction, the second rest shelf portion extending from the elongated rigid
25 spine in a second lateral direction, the second lateral direction being opposite the first
26 lateral direction (annotations added).

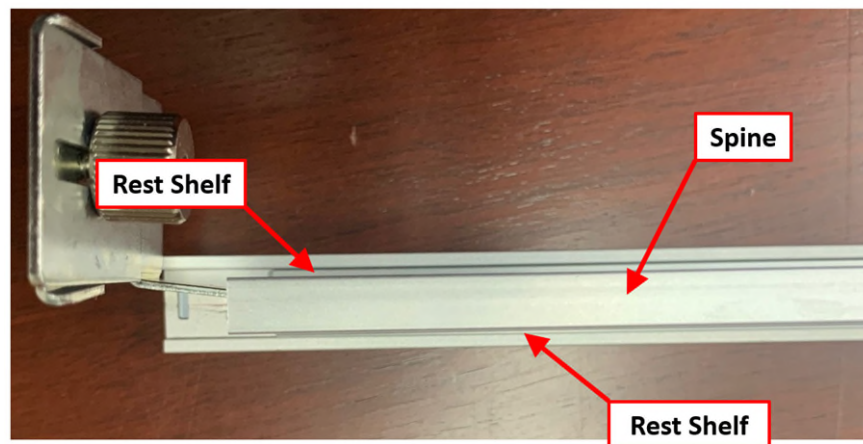
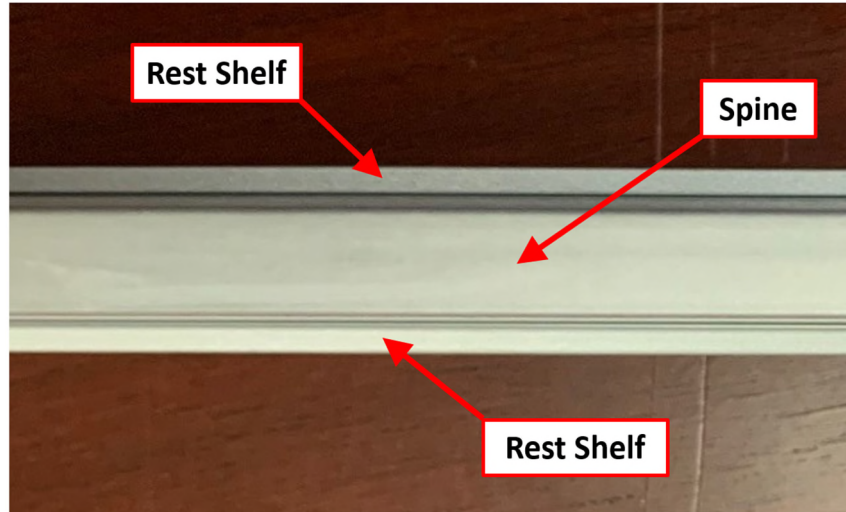
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104. Upon information and belief, the second type of the Accused Products, as shown below in the accompanying representative images, include a lower portion of the elongated rigid spine with a first rest shelf portion and a second rest shelf portion, the first rest shelf portion extending from the elongated rigid spine in a first lateral direction, the second rest shelf portion extending from the elongated rigid spine in a second lateral direction, the second lateral direction being opposite the first lateral direction (annotations added).

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105. The Accused Products further include the first and second rest shelf portions and elongated rigid spine forming a cross-sectional form of the T-bar from the first terminal end to the second terminal end, the cross-sectional form of the T-bar configured for placement of the suspended ceiling above the lower portion of the elongated rigid spine.

106. Upon information and belief, one type of the Accused Products shown in Exhibit 5, and the below accompanying representative image, include the first and second rest shelf portions and elongated rigid spine forming a cross-sectional form of the T-bar from the first terminal end to the second terminal end, the cross-sectional form of the T-bar configured for placement of the suspended ceiling above the lower portion of the elongated rigid spine (annotations added).

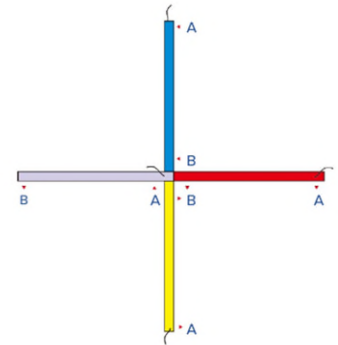
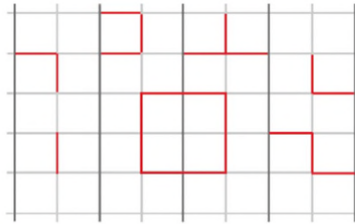
1 **Custom Pattern** (Only for LGL-T-SLIM-9 and LGL-T-SLIM-15)



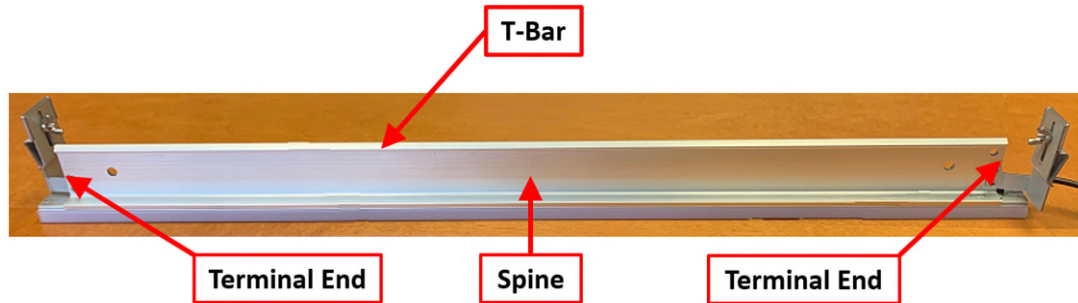
3 **Suspended Ceiling**
 4 T-SLIM LED can be installed in many configurations
 5 by replacing any of the cross tees between the
 6 main runners of the grid ceiling assembly.

7 It is free to create compelling spaces, and your space no longer has to be restricted to a single pattern
 8 on the ceiling. Custom pattern such as "L","T", "+","□"etc.

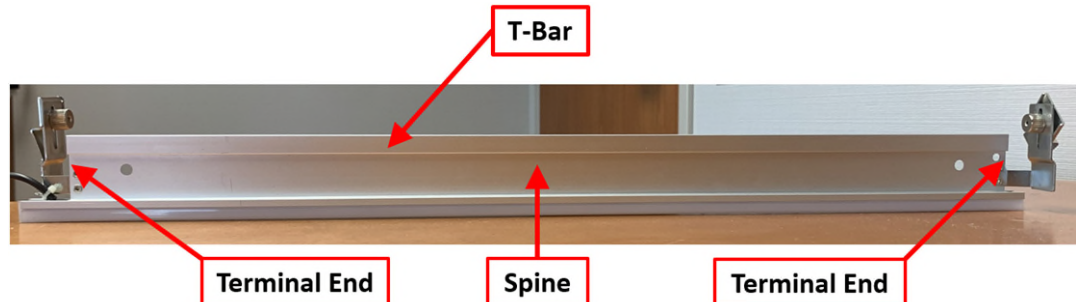
9 Custom Pattern Version



13 — Examples of configurations
 14 — Possible positions for T-grid LED light modules
 15 — One-piece main runner cannot be replaced
 16 **Remark: Only one A-end with wire in joint**

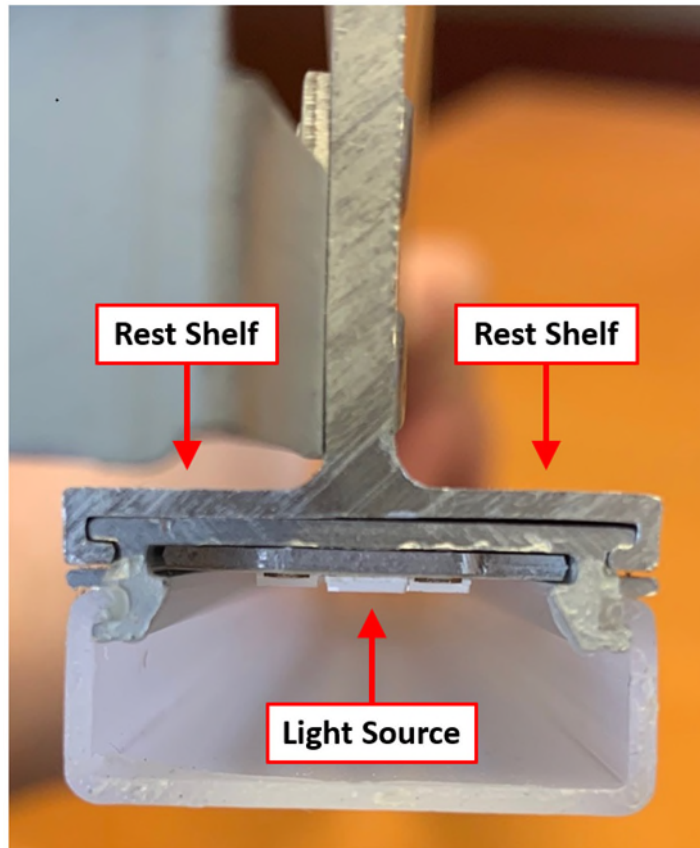


18 107. Upon information and belief, the second type of the Accused Products,
 19 as shown below in the accompanying representative image, include the first and
 20 second rest shelf portions and elongated rigid spine forming a cross-sectional form of
 21 the T-bar from the first terminal end to the second terminal end, the cross-sectional
 22 form of the T-bar configured for placement of the suspended ceiling above the lower
 23 portion of the elongated rigid spine (annotations added).



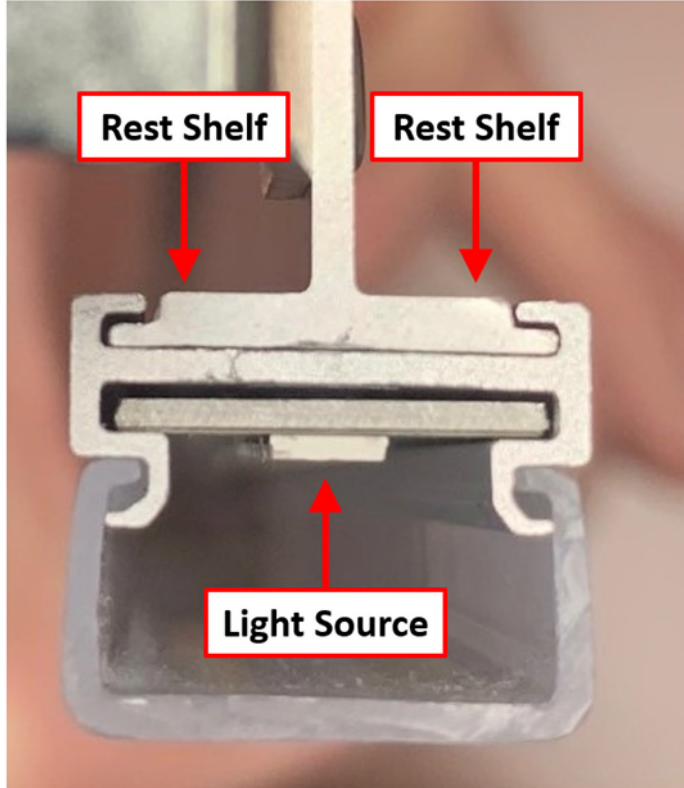
1 108. The Accused Products include at least one light source adjacent a bottom
2 side of each the first and second rest shelf portion and attached to the first or second
3 rest shelf portion.

4 109. Upon information and belief, one type of the Accused Products, as
5 shown below in the accompanying representative image, includes at least one light
6 source adjacent a bottom side of each the first and second rest shelf portion and
7 attached to the first or second rest shelf portion (annotations added).



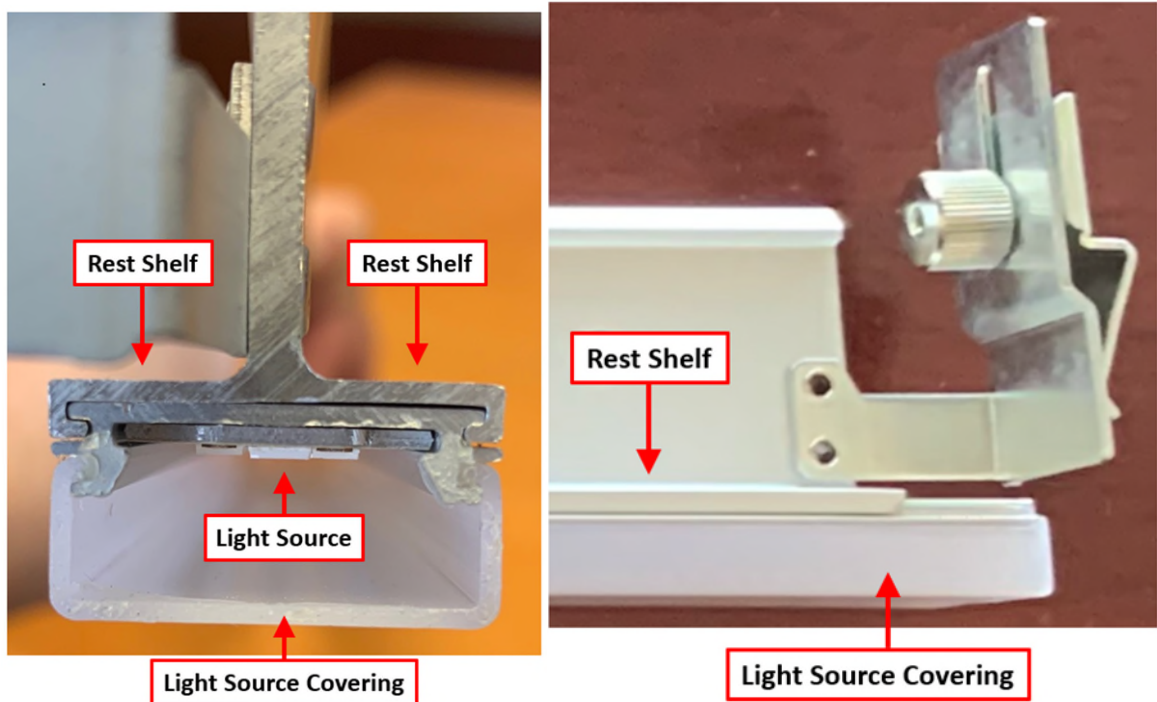
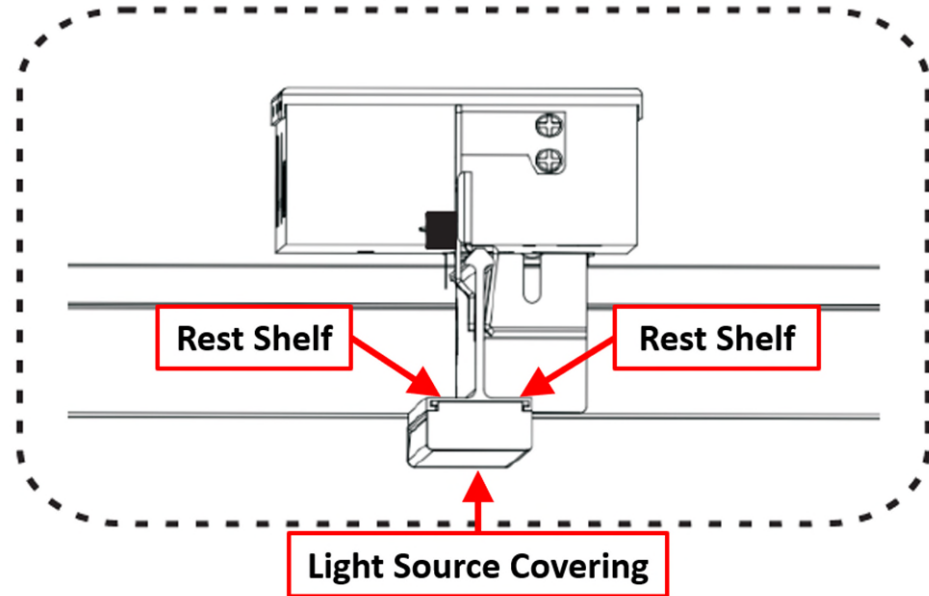
22 110. Upon information and belief, the second type of the Accused Products,
23 as shown below in the accompanying representative image, includes at least one light
24 source adjacent a bottom side of each the first and second rest shelf portion and
25 attached to the first or second rest shelf portion (annotations added).

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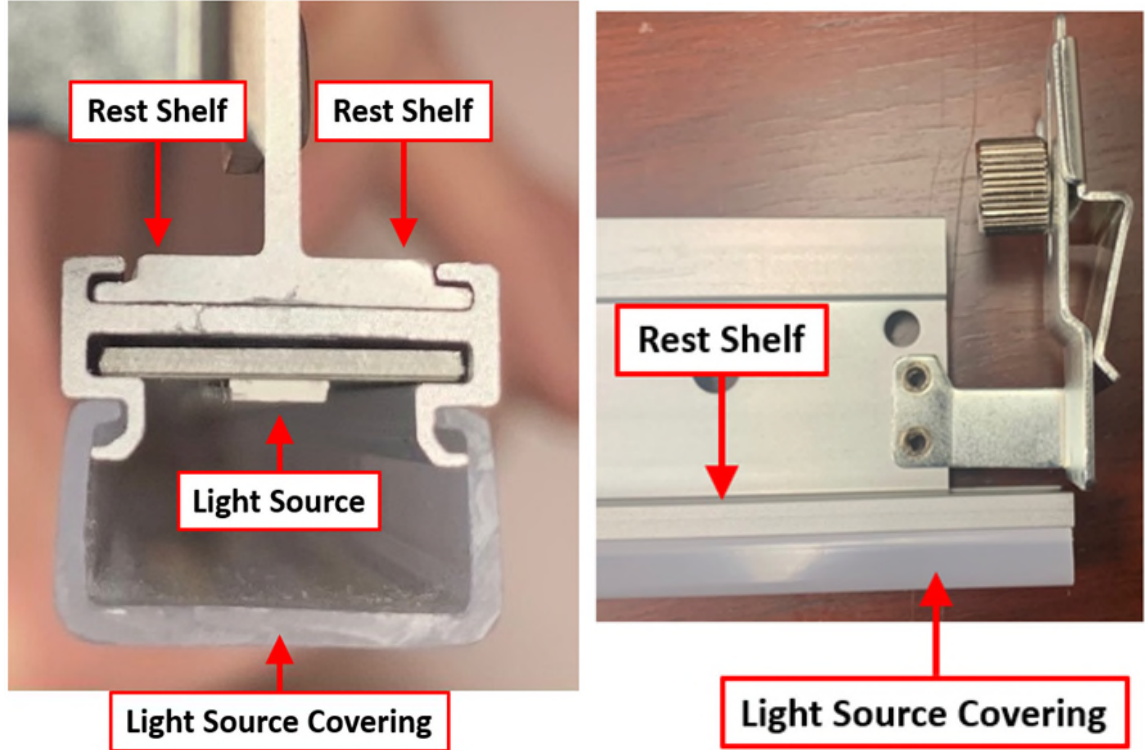
111. The Accused Products include a light source covering adapted and configured to cover the at least one light source and to be located below the first and second rest shelf portions, the light source covering configured to allow passage of light illuminating from the light source through the light source covering.

112. Upon information and belief, one type of the Accused Products shown in Exhibit 7, and the below accompanying representative image, includes a light source covering adapted and configured to cover the at least one light source and to be located below the first and second rest shelf portions, the light source covering configured to allow passage of light illuminating from the light source through the light source covering (annotations added).



113. Upon information and belief, the second type of the Accused Products, as shown below in the accompanying representative images, includes a light source covering adapted and configured to cover the at least one light source and to be located below the first and second rest shelf portions, the light source covering configured to allow passage of light illuminating from the light source through the light source covering (annotations added).

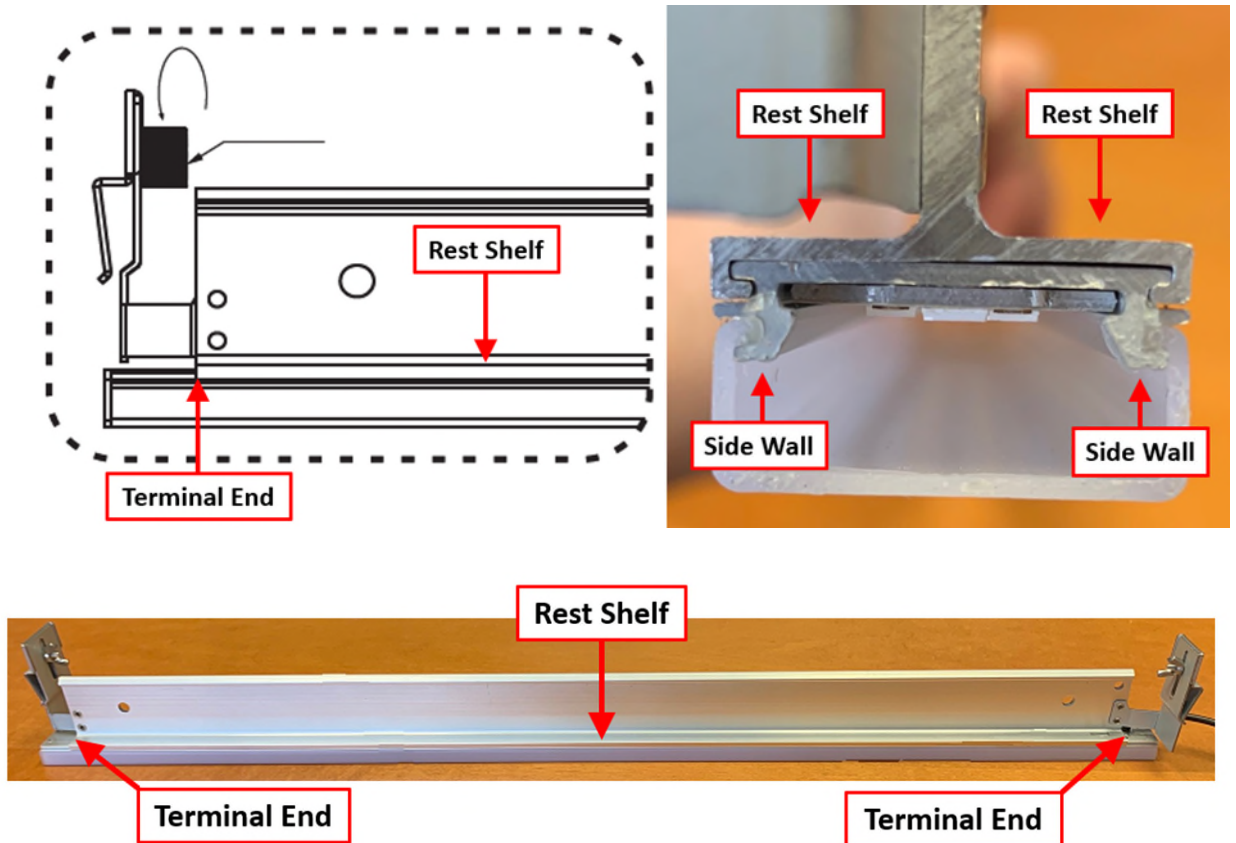
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114. The Accused Products include a first side wall extending downward from a bottom side of the first rest shelf portion and extending from a first terminal end of the first rest shelf portion to a second terminal end of the first rest shelf portion, and a second side wall extending downward from a bottom side of the second rest shelf portion and extending from a first terminal end of the second rest shelf portion to a second terminal end of the second rest shelf portion.

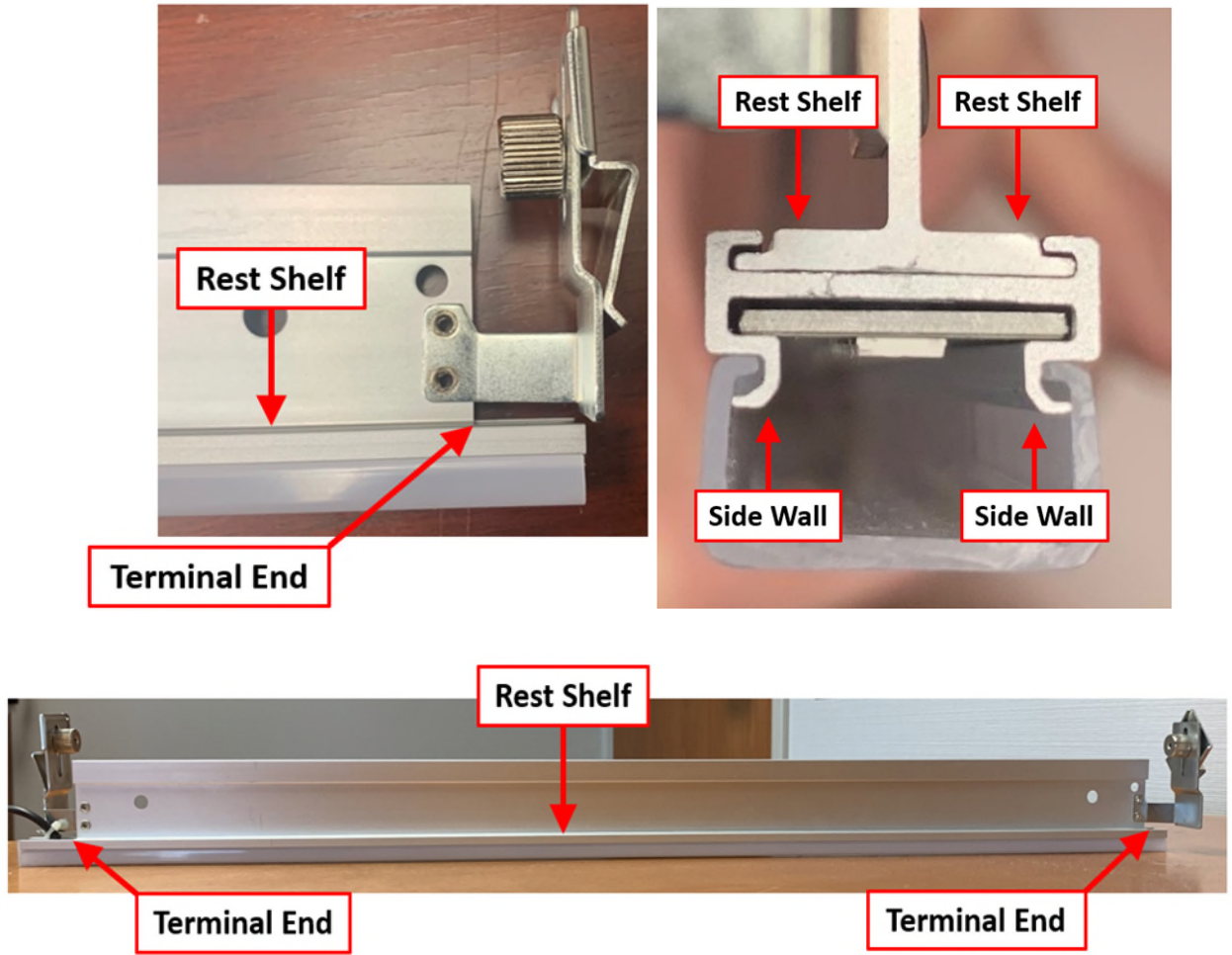
115. Upon information and belief, one type of the Accused Products shown in Exhibit 7, and the below accompanying representative images, includes a first side wall extending downward from a bottom side of the first rest shelf portion and extending from a first terminal end of the first rest shelf portion to a second terminal end of the first rest shelf portion, and a second side wall extending downward from a bottom side of the second rest shelf portion and extending from a first terminal end of the second rest shelf portion to a second terminal end of the second rest shelf portion (annotations added).

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116. Upon information and belief, the second type of the Accused Products, as shown below in the accompanying representative images, includes a first side wall extending downward from a bottom side of the first rest shelf portion and extending from a first terminal end of the first rest shelf portion to a second terminal end of the first rest shelf portion, and a second side wall extending downward from a bottom side of the second rest shelf portion and extending from a first terminal end of the second rest shelf portion to a second terminal end of the second rest shelf portion (annotations added).

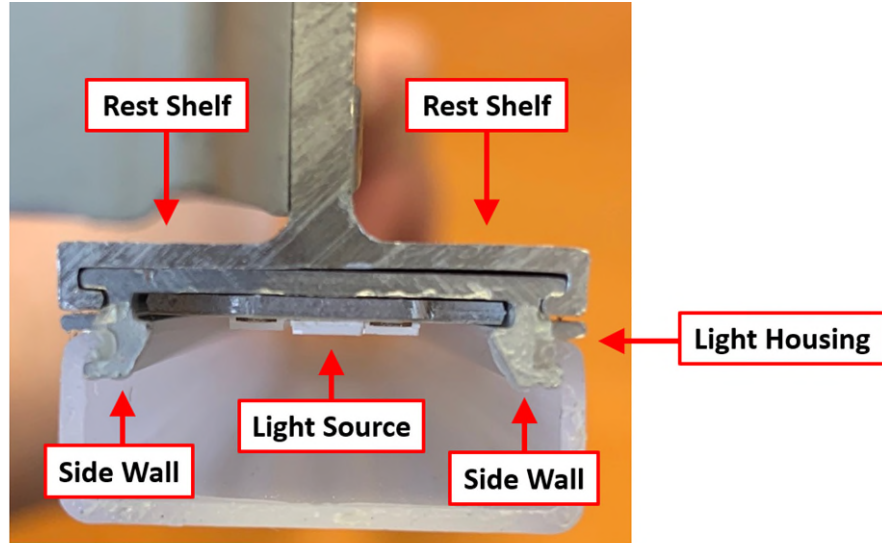
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117. The Accused Products further include the first and second side walls and the bottom sides of the first and second rest shelf portions forming a light housing to contain the at least one light source of the T-bar.

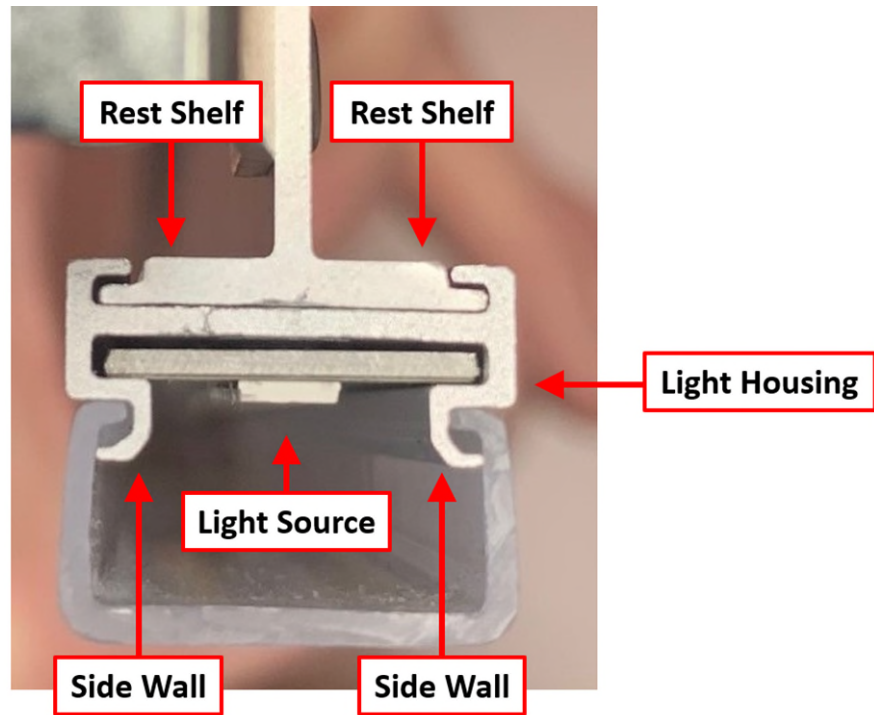
118. Upon information and belief, one type of the Accused Products, as shown below in the accompanying representative image, includes the first and second side walls and the bottom sides of the first and second rest shelf portions forming a light housing to contain the at least one light source of the T-bar (annotations added).

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10 119. Upon information and belief, the second type of the Accused Products,
11 as shown below in the accompanying representative image, includes the first and
12 second side walls and the bottom sides of the first and second rest shelf portions
13 forming a light housing to contain the at least one light source of the T-bar
14 (annotations added).

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27 120. Thus, under one or more subsections of 35 U.S.C. § 271, Defendant has
28 directly infringed and continues to directly infringe the '805 Patent by making, using,

1 offering to sell, selling, and/or importing the Accused Products within and into the
2 United States.

3 121. Luminos Global’s direct infringement of the ’805 Patent has caused
4 financial damages to JLC, including for example, lost sales revenue caused by
5 Defendant’s sales of the Accused Products

6 122. Luminos Global’s direct infringement of the ‘805 Patent has irreparably
7 damaged JLC, including for example, avoiding JLC’s right to exclude others from
8 making, using, selling, importing, or offering to sell products embodying the
9 invention patented in the ‘805 Patent.

10 123. Luminos Global’s direct infringement of the ‘805 Patent will continue
11 unless enjoined by the Court under 35 U.S.C. § 283 and/or the equitable powers of
12 this Court.

13 124. Luminos Global’s lacks a reasonable belief that making, using, selling,
14 importing, or offering to sell the Accused Products in the U.S. does not directly
15 infringe the ‘805 Patent.

16 125. Luminos Global’s knowledge of the ‘805 Patent and lack of reasonable
17 belief that making, using, selling, importing, or offering to sell the Accused Products
18 in the U.S. does not directly infringe the ‘805 Patent constitutes willful infringement
19 of the ‘805 Patent.

20 126. Upon information and belief, Defendant also indirectly infringes the
21 ’805 Patent by contributory infringement in selling and/or offering to sell the Accused
22 Products to its customers because the Accused Products are material to practicing the
23 invention, they have no substantial non-infringing uses, and Defendant knows, or
24 should reasonably know, that the Accused Products are especially made or adapted
25 for use in an infringement of the ’805 Patent.

26 127. Upon information and belief, Defendant also indirectly infringes the
27 ’805 Patent by inducing infringement in aiding, instructing, or otherwise acting with
28 the intent to cause acts by its customers that would constitute direct infringement of

1 the '805 Patent, Defendant knew of the '805 Patent, or was willfully blind to its
2 existence, Defendant knew or was willfully blind in consciously ignoring the
3 possibility that its actions would infringe at least one claim of the '805 Patent, and
4 Defendant's customers directly infringe at least one claim of the '805 Patent.

5 128. Luminos Global's indirect infringement of the '805 Patent has caused
6 financial damages to JLC, including for example, lost sales revenue caused by
7 Defendant's sales of the Accused Products

8 129. Luminos Global's indirect infringement of the '805 Patent has
9 irreparably damaged JLC, including for example, avoiding JLC's right to exclude
10 others from making, using, selling, importing, or offering to sell products embodying
11 the invention patented in the '805 Patent.

12 130. Luminos Global's indirect infringement of the '805 Patent will continue
13 unless enjoined by the Court under 35 U.S.C. § 283 and/or the equitable powers of
14 this Court.

15 131. Luminos Global's lacks a reasonable belief that making, using, selling,
16 importing, or offering to sell the Accused Products in the U.S. does not indirectly
17 infringe the '805 Patent.

18 132. Luminos Global's knowledge of the '805 Patent and lack of reasonable
19 belief that making, using, selling, importing, or offering to sell the Accused Products
20 in the U.S. does not indirectly infringe the '805 Patent constitutes willful infringement
21 of the '805 Patent.

22 **THIRD CLAIM**

23 **PATENT INFRINGEMENT**

24 **Direct and Indirect Infringement of U.S. Patent No. 11,732,878**

25 **("the '878 Patent") under 35 U.S.C. § 271**

26 133. JLC incorporates by reference, as if fully set forth herein, Paragraphs 1-
27 132 of this Complaint.

1 134. Upon information and belief, Defendant uses, offers for sale, sells,
2 and/or imports the Accused Products into the United States.

3 135. Claim 1 of the '878 Patent is set forth as follows:

4 136. A T-bar for a suspended ceiling, the T-bar comprising:

5 137. an elongated rigid spine extending from a first terminal end to a second
6 terminal end;

7 138. an anchor attached to the elongated rigid spine on at least one of the first
8 or second terminal ends;

9 139. a lower portion of the elongated rigid spine including a first rest shelf
10 portion and a second rest shelf portion, the first rest shelf portion extending from the
11 elongated rigid spine in a first lateral direction, the second rest shelf portion extending
12 from the elongated rigid spine in a second lateral direction, the second lateral direction
13 being opposite the first lateral direction, the first and second rest shelf portions and
14 elongated rigid spine forming a cross-sectional form of the T-bar from the first
15 terminal end to the second terminal end, the cross-sectional form of the T-bar
16 configured for placement of the suspended ceiling above the lower portion of the
17 elongated rigid spine;

18 140. a first track slot portion extending downward from the first rest shelf
19 portion;

20 141. a second track slot portion extending downward from the second rest
21 shelf portion;

22 142. a lighting module extending from at least the first terminal end to at least
23 the second terminal end of the elongated rigid spine, the lighting module located
24 below the first and second rest shelf portions and held into position below each the
25 first and second rest shelf portions by placement within the first track slot portion and
26 the second track slot portion; and

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1 143. wherein the lighting module contains a first side rail and a second side
2 rail, the first side rail of the lighting module resting within the first track slot portion
3 and the second side rail resting within the second track slot portion.

4 144. Luminos Global directly and/or indirectly infringes the claims of the
5 '878 Patent, including, but not limited to, claim 1.

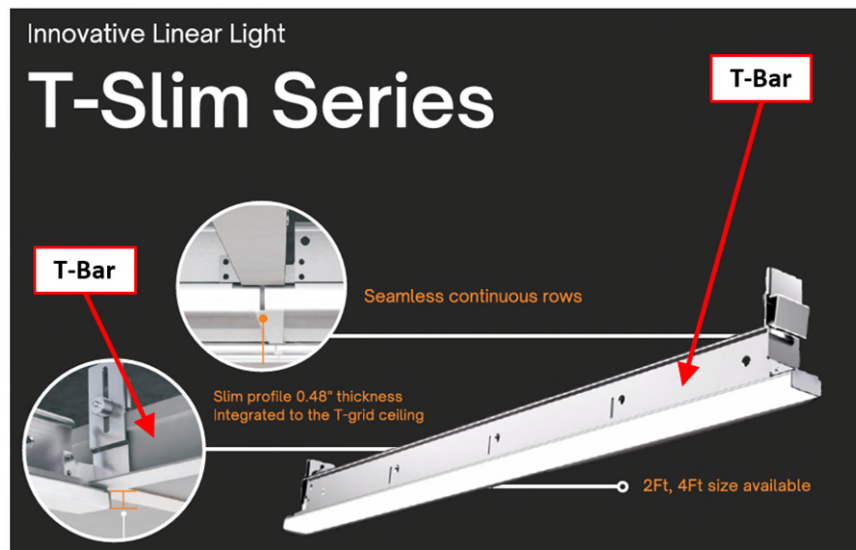
6 145. Upon information and belief, representative images illustrating examples
7 of the Accused Products offered by Luminos Global are viewed below.

8 146. These representative images for the Accused Products are presented with
9 respect to claim 1 of the '878 Patent.

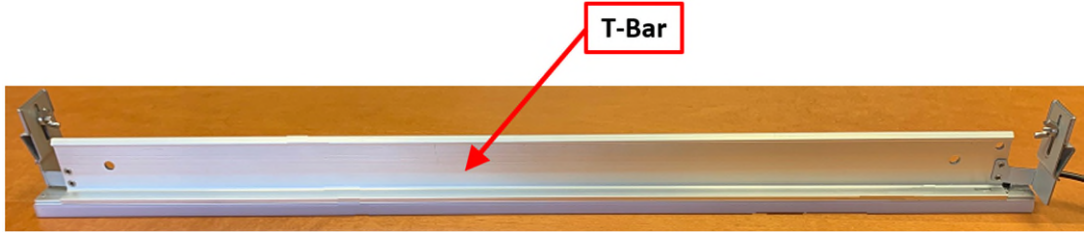
10 147. JLC reserves the right to amend/supplement these representative images
11 for the Accused Products with further charts/illustrations for all infringed claims of
12 the '878 Patent, including claim 1 as viewed below.

13 148. The Accused Products are T-bars for a suspended ceiling.

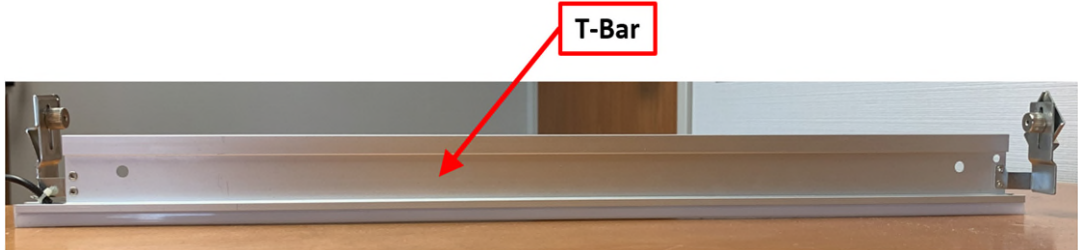
14 149. Upon information and belief, the Accused Products shown in Exhibit 5
15 and the accompanying representative image are T-bars for suspended ceilings. The
16 below representative image illustrates one type of the Accused Products, which is
17 available for purchase and suitable for use in a grid ceiling environment (annotations
18 added).



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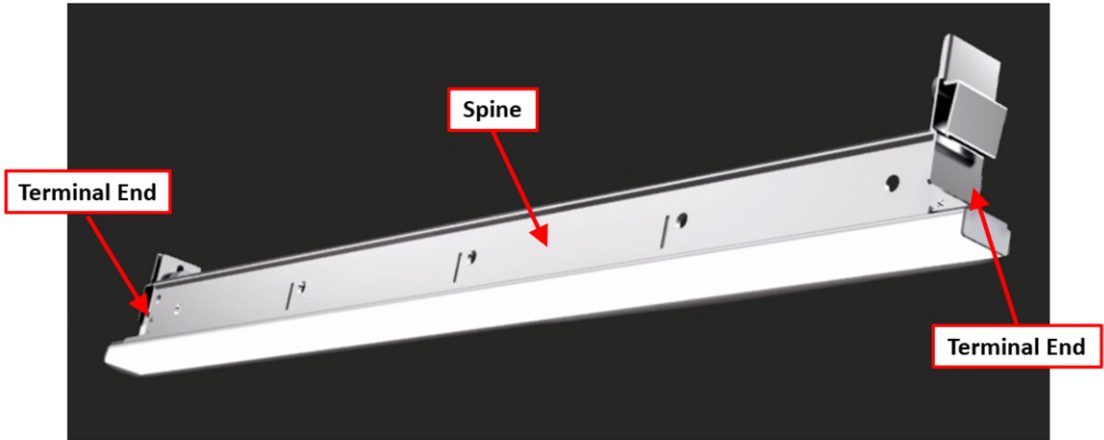


150. Upon information and belief, the Accused Products as shown below in the accompanying representative image are also T-bars for suspended ceilings. The below representative image illustrates a second type of the Accused Products, which is available for purchase and suitable for use in a grid ceiling environment (annotations added).

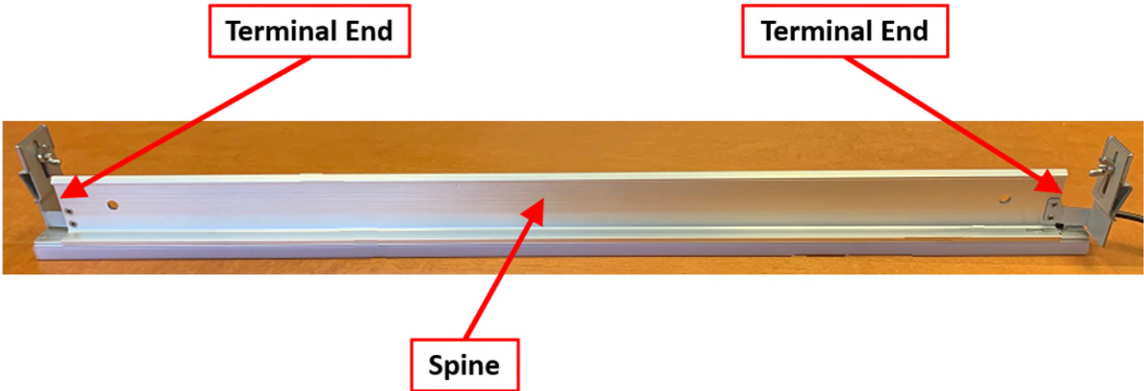


151. The Accused Products include an elongated rigid spine extending from a first terminal end to a second terminal end.

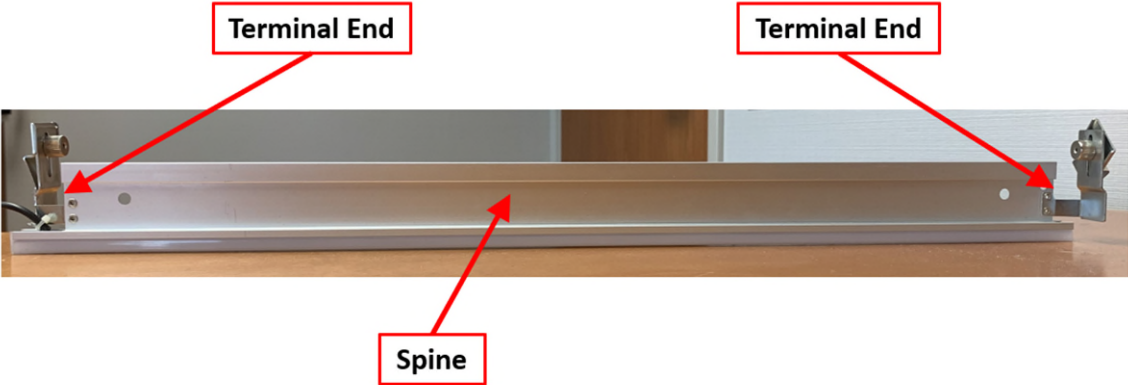
152. Upon information and belief, one type of the Accused Products shown in Exhibit 6, and the below accompanying representative image, include an elongated rigid spine extending from a first terminal end to a second terminal end (annotations added).



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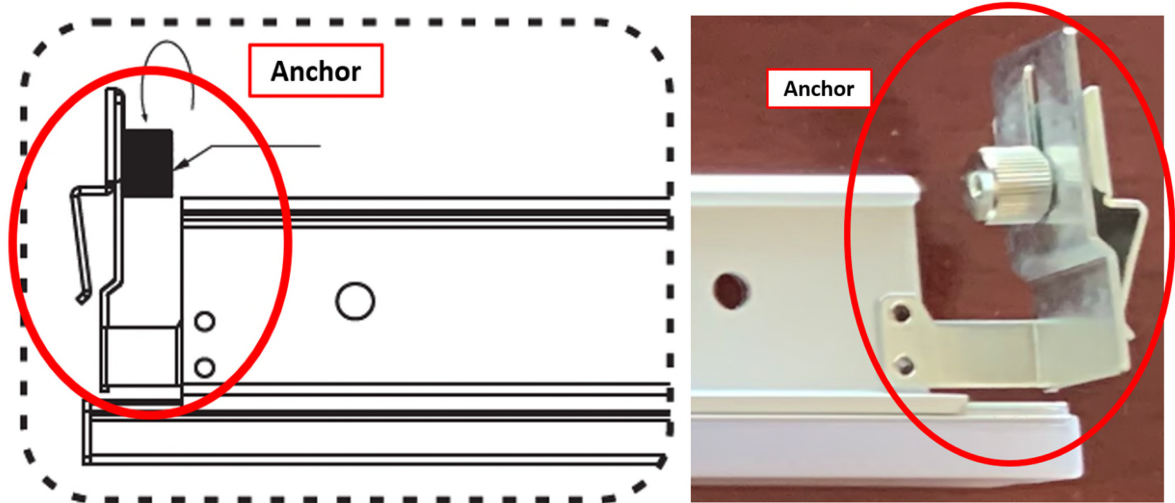
153. Upon information and belief, the second type of the Accused Products, as shown below in the accompanying representative image, include an elongated rigid spine extending from a first terminal end to a second terminal end (annotations added).



154. The Accused Products include an anchor attached to the elongated rigid spine on at least one of the first or second terminal ends.

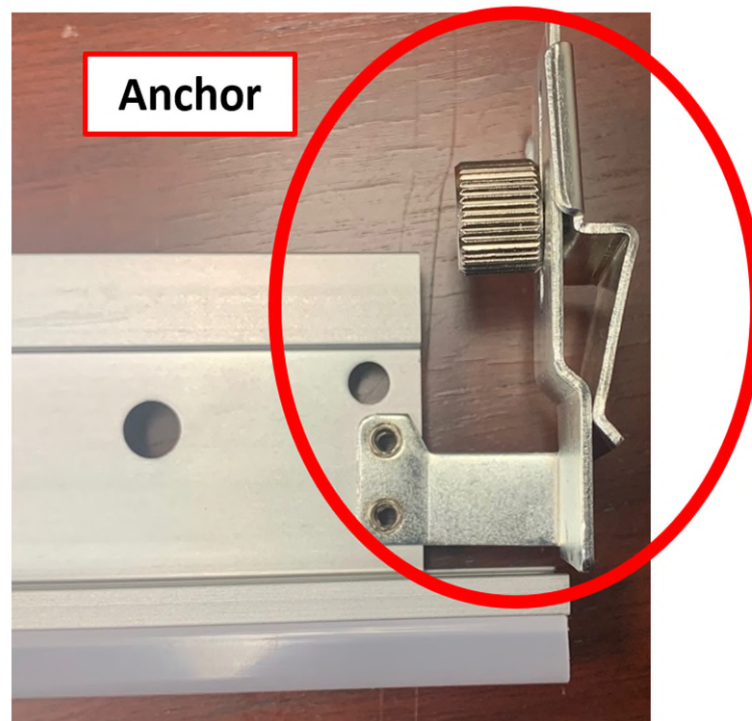
155. Upon information and belief, one type of the Accused Products shown in Exhibit 7, and the below accompanying representative image, include an anchor attached to the elongated rigid spine on at least one of the first or second terminal ends (annotations added).

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10 156. Upon information and belief, the second type of the Accused Products,
11 as shown below in the accompanying representative image, include an anchor
12 attached to the elongated rigid spine on at least one of the first or second terminal ends
13 (annotations added).

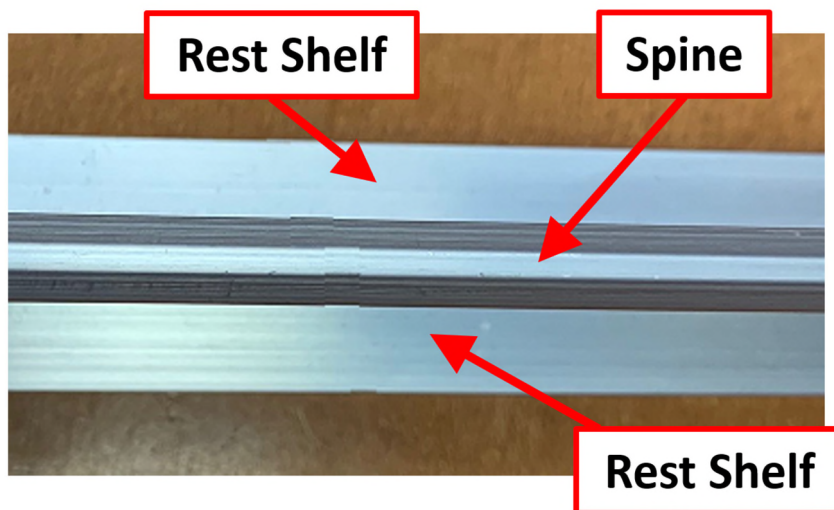
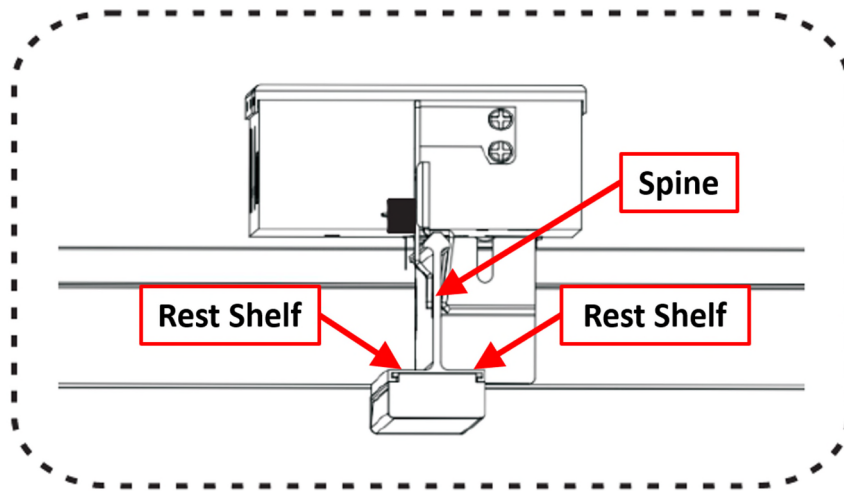
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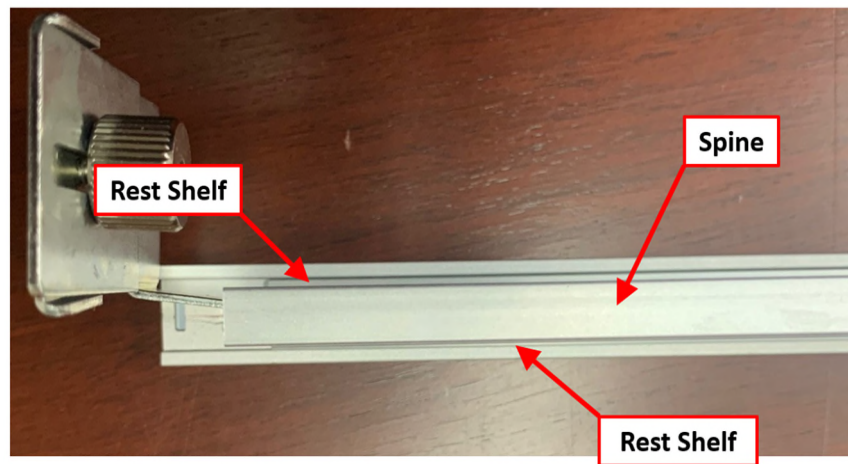
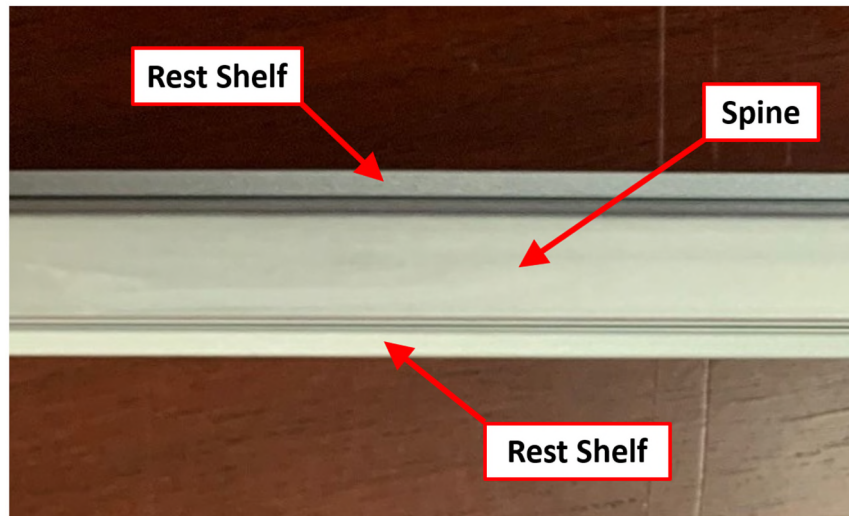
26 157. The Accused Products include a lower portion of the elongated rigid
27 spine with a first rest shelf portion and a second rest shelf portion, the first rest shelf
28 portion extending from the elongated rigid spine in a first lateral direction, the second

1 rest shelf portion extending from the elongated rigid spine in a second lateral
2 direction, the second lateral direction being opposite the first lateral direction.

3 158. Upon information and belief, one type of the Accused Products shown
4 in Exhibit 7, and the below accompanying representative image, include a lower
5 portion of the elongated rigid spine with a first rest shelf portion and a second rest
6 shelf portion, the first rest shelf portion extending from the elongated rigid spine in a
7 first lateral direction, the second rest shelf portion extending from the elongated rigid
8 spine in a second lateral direction, the second lateral direction being opposite the first
9 lateral direction (annotations added).



1 159. Upon information and belief, the second type of the Accused Products,
2 as shown below in the accompanying representative images, include a lower portion
3 of the elongated rigid spine with a first rest shelf portion and a second rest shelf
4 portion, the first rest shelf portion extending from the elongated rigid spine in a first
5 lateral direction, the second rest shelf portion extending from the elongated rigid spine
6 in a second lateral direction, the second lateral direction being opposite the first lateral
7 direction (annotations added).



25 160. The Accused Products further include the first and second rest shelf
26 portions and elongated rigid spine forming a cross-sectional form of the T-bar from
27 the first terminal end to the second terminal end, the cross-sectional form of the T-bar
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1 configured for placement of the suspended ceiling above the lower portion of the
2 elongated rigid spine.

3 161. Upon information and belief, one type of the Accused Products shown
4 in Exhibit 5, and the below accompanying representative image, include the first and
5 second rest shelf portions and elongated rigid spine forming a cross-sectional form of
6 the T-bar from the first terminal end to the second terminal end, the cross-sectional
7 form of the T-bar configured for placement of the suspended ceiling above the lower
8 portion of the elongated rigid spine (annotations added).

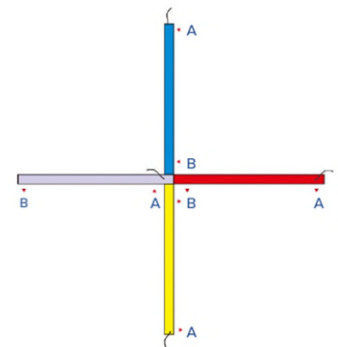
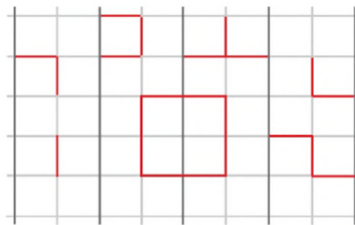
9 Custom Pattern (Only for LGL-T-SLIM-9 and LGL-T-SLIM-15)



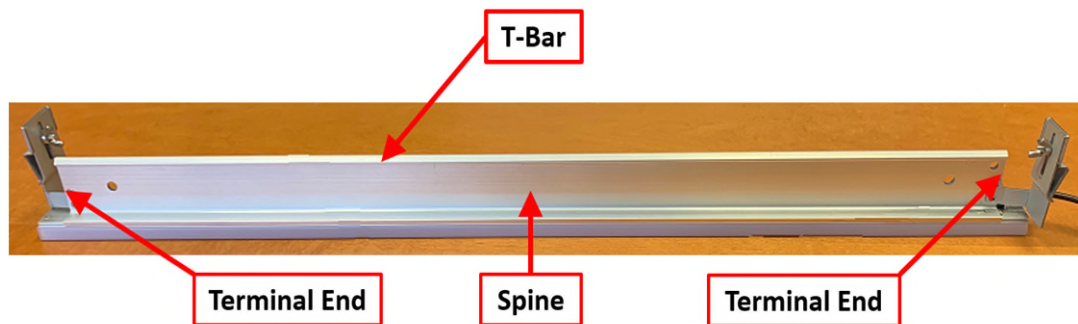
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14 T-SLIM LED can be installed in many configurations by replacing any of the cross tees between the main runners of the grid ceiling assembly.

15 It is free to create compelling spaces, and your space no longer has to be restricted to a single pattern on the ceiling. Custom pattern such as "L","T","+", "□" etc.

16 Custom Pattern Version

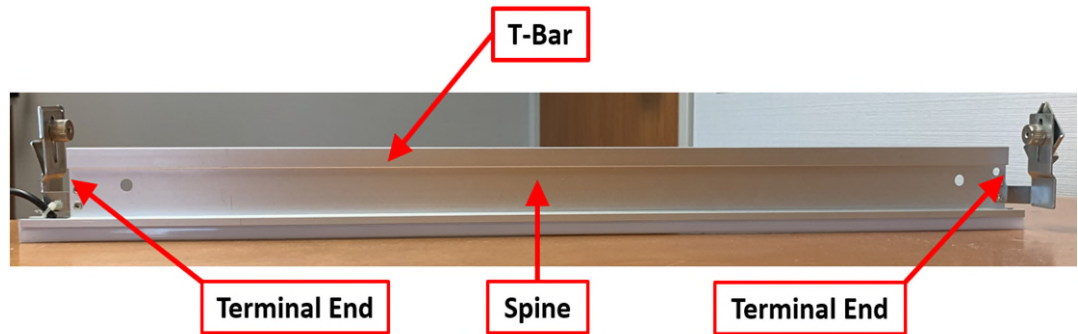


- 17 — Examples of configurations
 - 18 — Possible positions for T-grid LED light modules
 - 19 — One-piece main runner cannot be replaced
- 20 Remark: Only one A-end with wire in joint



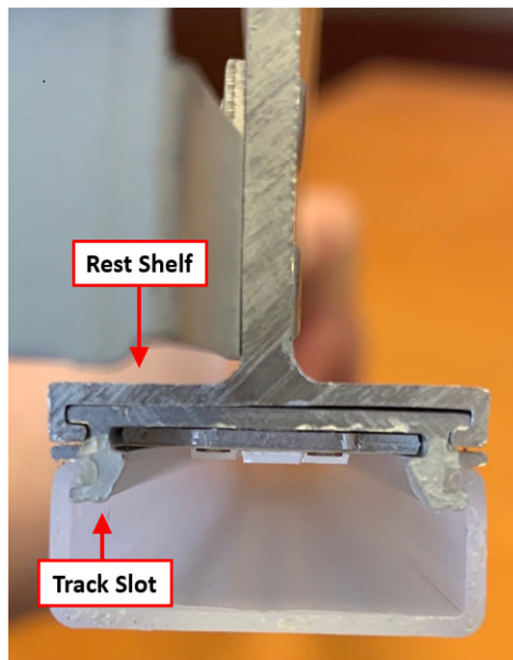
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25 162. Upon information and belief, the second type of the Accused Products,
26 as shown below in the accompanying representative image, include the first and
27 second rest shelf portions and elongated rigid spine forming a cross-sectional form of
28 the T-bar from the first terminal end to the second terminal end, the cross-sectional

1 form of the T-bar configured for placement of the suspended ceiling above the lower
2 portion of the elongated rigid spine (annotations added).



9 163. The Accused Products include a first track slot portion extending
10 downward from the first rest shelf portion.

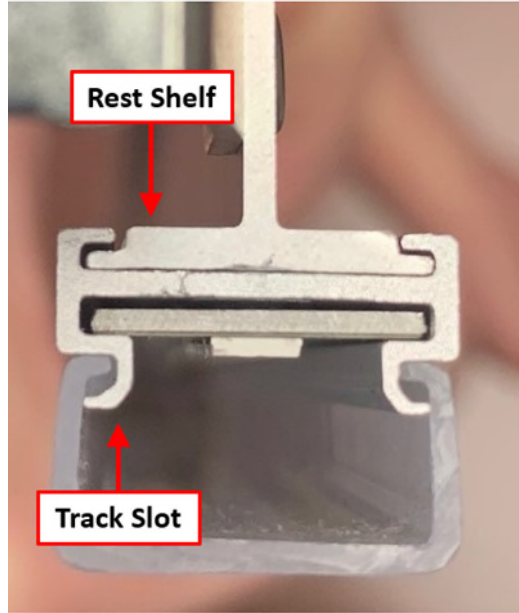
11 164. Upon information and belief, one type of the Accused Products, as
12 shown below in the accompanying representative image, include a first track slot
13 portion extending downward from the first rest shelf portion (annotations added).



25 165. Upon information and belief, the second type of the Accused Products,
26 as shown below in the accompanying representative image, includes a first track slot
27 portion extending downward from the first rest shelf portion (annotations added).

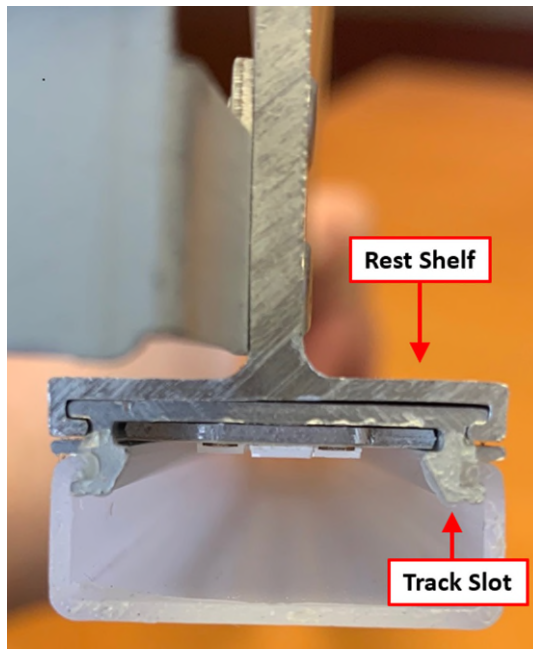
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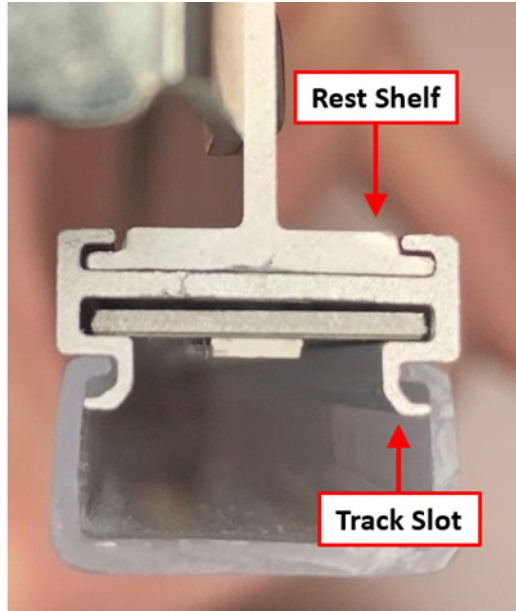


166. The Accused Products include a second track slot portion extending downward from the second rest shelf portion.

167. Upon information and belief, one type of the Accused Products, as shown below in the accompanying representative image, include a second track slot portion extending downward from the second rest shelf portion (annotations added).



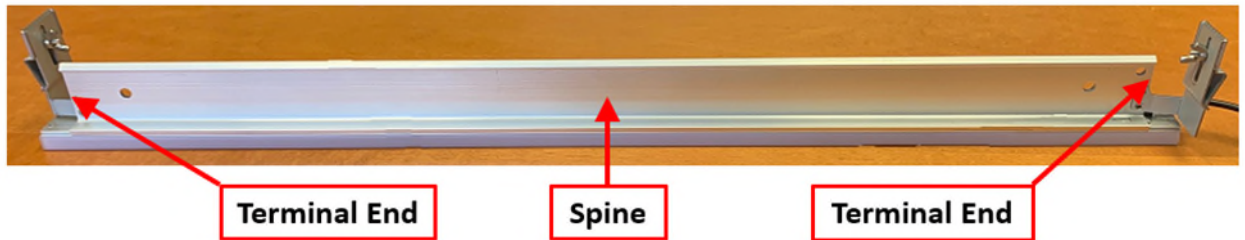
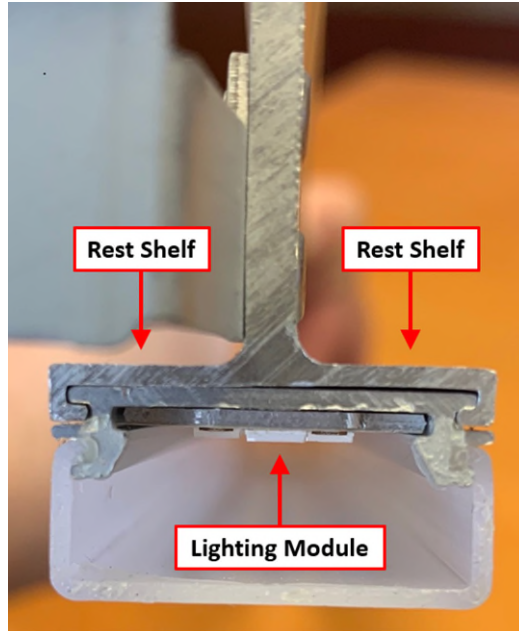
1 168. Upon information and belief, the second type of the Accused Products,
2 as shown below in the accompanying representative image, includes a second track
3 slot portion extending downward from the first rest shelf portion (annotations added).



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14 169. The Accused Products include a lighting module extending from at least
15 the first terminal end to at least the second terminal end of the elongated rigid spine.

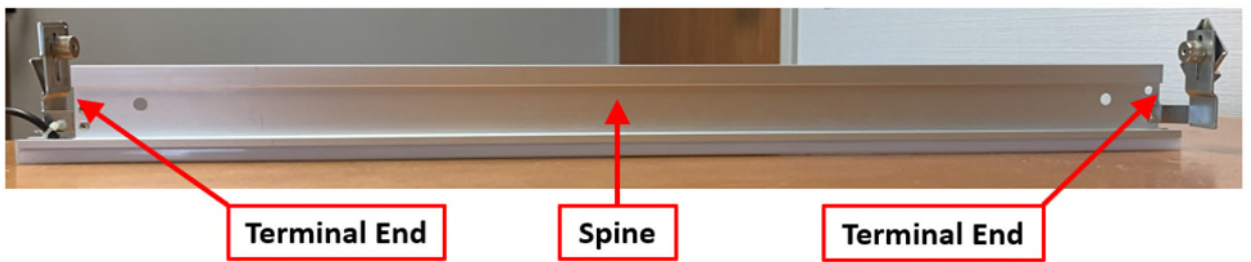
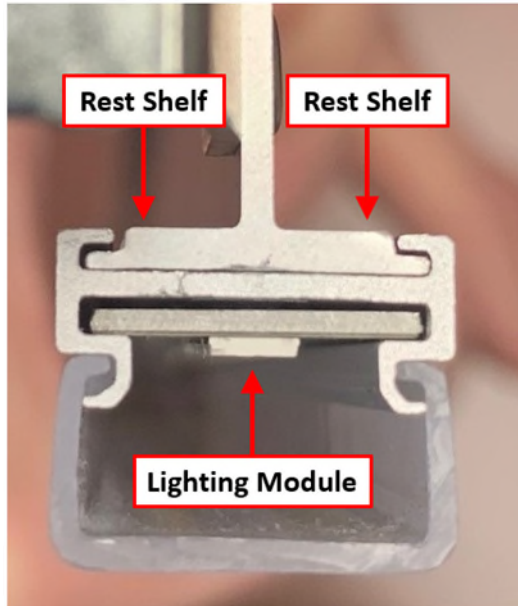
16 170. Upon information and belief, one type of the Accused Products, as
17 shown below in the accompanying representative images, includes a lighting module
18 extending from at least the first terminal end to at least the second terminal end of the
19 elongated rigid spine (annotations added).
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171. Upon information and belief, the second type of the Accused Products, as shown below in the accompanying representative images, includes a lighting module extending from at least the first terminal end to at least the second terminal end of the elongated rigid spine (annotations added).

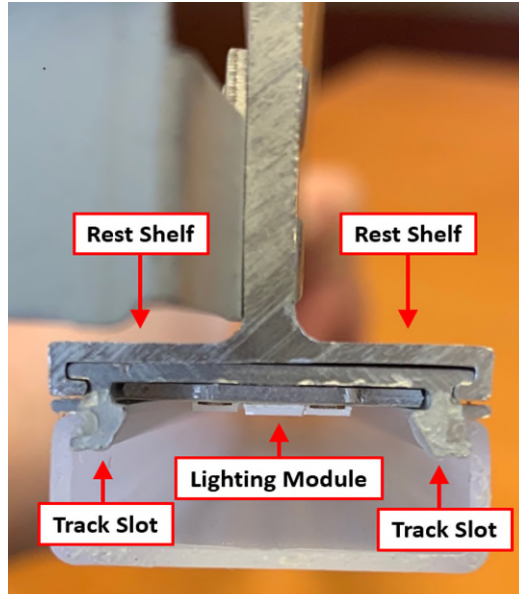
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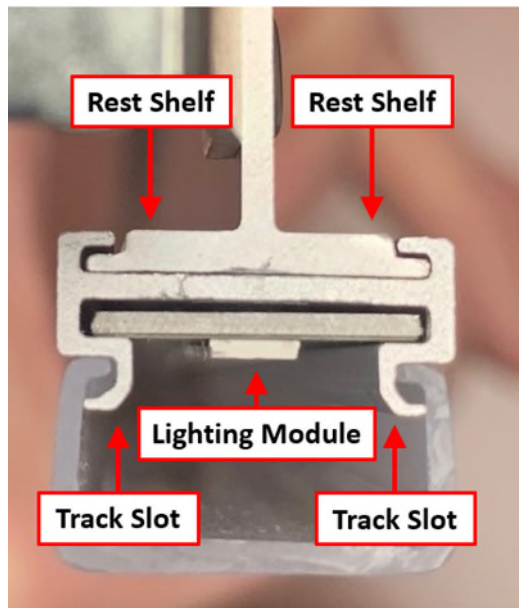
172. The Accused Products further include the lighting module located below the first and second rest shelf portions and held into position below each the first and second rest shelf portions by placement within the first track slot portion and the second track slot portion.

173. Upon information and belief, one type of the Accused Products, as shown below in the accompanying representative image, includes the lighting module located below the first and second rest shelf portions and held into position below each the first and second rest shelf portions by placement within the first track slot portion and the second track slot portion (annotations added).

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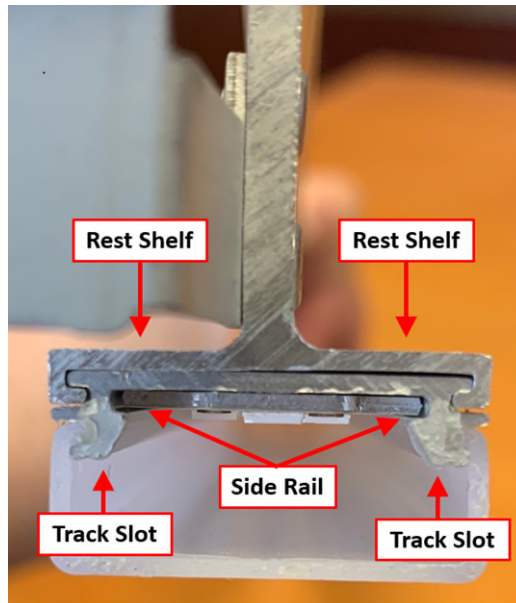
174. Upon information and belief, the second type of the Accused Products, as shown below in the accompanying representative image, includes the lighting module located below the first and second rest shelf portions and held into position below each the first and second rest shelf portions by placement within the first track slot portion and the second track slot portion (annotations added).



175. The Accused Products include wherein the lighting module contains a first side rail and a second side rail, the first side rail of the lighting module resting

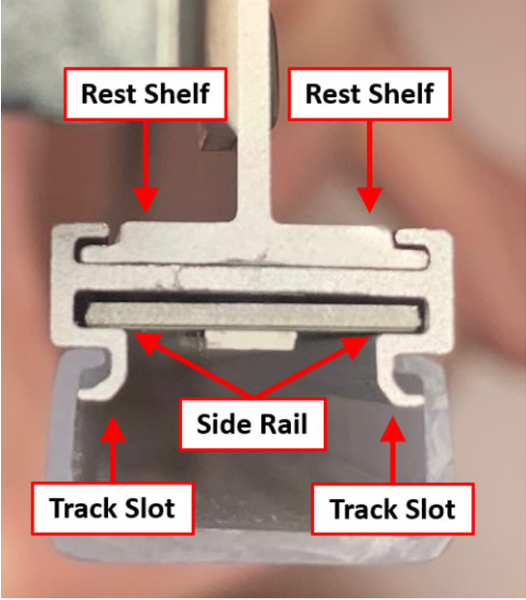
1 within the first track slot portion and the second side rail resting within the second
2 track slot portion.

3 176. Upon information and belief, one type of the Accused Products, as
4 shown below in the accompanying representative image, includes wherein the
5 lighting module contains a first side rail and a second side rail, the first side rail of the
6 lighting module resting within the first track slot portion and the second side rail
7 resting within the second track slot portion (annotations added).



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18 177. Upon information and belief, the second type of the Accused Products,
19 as shown below in the accompanying representative image, includes wherein the
20 lighting module contains a first side rail and a second side rail, the first side rail of the
21 lighting module resting within the first track slot portion and the second side rail
22 resting within the second track slot portion (annotations added).

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178. Thus, under one or more subsections of 35 U.S.C. § 271, Defendant has directly infringed and continues to directly infringe the '878 Patent by making, using, offering to sell, selling, and/or importing the Accused Products within and into the United States.

179. Luminos Global's direct infringement of the '878 Patent has caused financial damages to JLC, including for example, lost sales revenue caused by Defendant's sales of the Accused Products

180. Luminos Global's direct infringement of the '878 Patent has irreparably damaged JLC, including for example, avoiding JLC's right to exclude others from making, using, selling, importing, or offering to sell products embodying the invention patented in the '878 Patent.

181. Luminos Global's direct infringement of the '878 Patent will continue unless enjoined by the Court under 35 U.S.C. § 283 and/or the equitable powers of this Court.

182. Luminos Global's lacks a reasonable belief that making, using, selling, importing, or offering to sell the Accused Products in the U.S. does not directly infringe the '878 Patent.

1 183. Luminos Global’s knowledge of the ’878 Patent and lack of reasonable
2 belief that making, using, selling, importing, or offering to sell the Accused Products
3 in the U.S. does not directly infringe the ’878 Patent constitutes willful infringement
4 of the ’878 Patent.

5 184. Upon information and belief, Defendant also indirectly infringes the
6 ’878 Patent by contributory infringement in selling and/or offering to sell the Accused
7 Products to its customers because the Accused Products are material to practicing the
8 invention, they have no substantial non-infringing uses, and Defendant knows, or
9 should reasonably know, that the Accused Products are especially made or adapted
10 for use in an infringement of the ’878 Patent.

11 185. Upon information and belief, Defendant also indirectly infringes the
12 ’878 Patent by inducing infringement in aiding, instructing, or otherwise acting with
13 the intent to cause acts by its customers that would constitute direct infringement of
14 the ’878 Patent, Defendant knew of the ’878 Patent, or was willfully blind to its
15 existence, Defendant knew or was willfully blind in consciously ignoring the
16 possibility that its actions would infringe at least one claim of the ’878 Patent, and
17 Defendant’s customers directly infringe at least one claim of the ’878 Patent.

18 186. Luminos Global’s indirect infringement of the ’878 Patent has caused
19 financial damages to JLC, including for example, lost sales revenue caused by
20 Defendant’s sales of the Accused Products

21 187. Luminos Global’s indirect infringement of the ’878 Patent has
22 irreparably damaged JLC, including for example, avoiding JLC’s right to exclude
23 others from making, using, selling, importing, or offering to sell products embodying
24 the invention patented in the ’878 Patent.

25 188. Luminos Global’s indirect infringement of the ’878 Patent will continue
26 unless enjoined by the Court under 35 U.S.C. § 283 and/or the equitable powers of
27 this Court.

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1 189. Luminos Global’s lacks a reasonable belief that making, using, selling,
2 importing, or offering to sell the Accused Products in the U.S. does not indirectly
3 infringe the ’878 Patent.

4 190. Luminos Global’s knowledge of the ’878 Patent and lack of reasonable
5 belief that making, using, selling, importing, or offering to sell the Accused Products
6 in the U.S. does not indirectly infringe the ’878 Patent constitutes willful infringement
7 of the ’878 Patent.

8 **PRAYER FOR RELIEF**

9 **WHEREFORE**, JLC prays for judgment against Defendant Luminos Global
10 as follows:

11 A. Temporarily and permanently enjoin Defendant and any person acting in
12 concert with it from:

13 a. further infringement of JLC’s copyright in JLC’s Works;

14 B. Issue an Order prohibiting Defendant from violating JLC’s copyrights in
15 the United States;

16 C. Require Defendant to remove all images copied and/or derived from the
17 JLC Protected Work from its material(s) and/or any website(s) Defendant controls
18 and/or has the right to control;

19 D. Require Defendant to impound and dispose of all materials copied and/or
20 derived from the JLC Protected Work;

21 E. Award JLC actual and/or statutory damages for Defendant’s
22 infringement of JLC Protected Work pursuant to 17 U.S.C. § 504;

23 F. Find that Defendant’s infringement of the copyrights for the JLC
24 Protected Works was willful, and award \$150,000 statutory damages, or as otherwise
25 permitted under 17 U.S.C. § 504;

26 G. Order Defendant to impound and deliver up for destruction all goods,
27 advertising, literature and other forms of promotional material containing JLC
28 Protected Work and/or derived from JLC Protected Work;

1 H. Permanently enjoin Defendant Luminos Global and any person acting in
2 concert with it from:

- 3 a. further infringement of U.S. Patent No. 10,508,805, pursuant to
4 35 U.S.C. § 283;
- 5 b. further infringement of U.S. Patent No. 11,732,878, pursuant to
6 35 U.S.C. § 283;
- 7 c. assisting, aiding, or abetting any other person or business entity in
8 engaging in or performing any of the activities referred to in
9 subparagraph (a) or (b) above or taking any action that contributes
10 to any of the activities referred to in subparagraph (a) or (b) above;

11 I. Issue an Order prohibiting Defendant Luminos Global from:

- 12 a. making, using, selling, offer for sale, and/or importing into the
13 United States the Accused Products;
- 14 b. making, using, selling, offering for sale, importing into the United
15 States, or displaying any product that infringes U.S. Patent
16 No. 10,508,805; and,
- 17 c. making, using, selling, offering for sale, importing into the United
18 States, or displaying any product that infringes U.S. Patent
19 No. 11,732,878.

20 J. Finding Defendant Luminos Global has directly and/or indirectly
21 infringed U.S. Patent No. 10,508,805 and that such infringement has been willful;

22 K. Finding Defendant Luminos Global has directly and/or indirectly
23 infringed U.S. Patent No. 11,732,878 and that such infringement has been willful;

24 L. Require Defendant Luminos Global to forfeit all products that infringe
25 JLC's intellectual property rights to JLC;

26 M. Requiring Defendant Luminos Global to remove the Accused Products
27 from its website;

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1 N. Award JLC actual damages pursuant to 35 U.S.C. § 284 in an amount
2 adequate to compensate for Defendant Luminos Global’s infringement of U.S. Patent
3 No. 10,508,805, but in no amount less than a reasonable royalty for the use Defendant
4 has made of JLC’s invention;

5 O. Award JLC actual damages pursuant to 35 U.S.C. § 284 in an amount
6 adequate to compensate for Defendant Luminos Global’s infringement of U.S. Patent
7 No. 11,732,878, but in no amount less than a reasonable royalty for the use Defendant
8 has made of JLC’s invention;

9 P. Order Defendant, at its own expense, to recall any and all products that
10 bear any simulation, reproduction, copy, colorable imitation, or confusingly similar
11 type of the T-BAR LED® from any distributors, retailers, vendors, or others to whom
12 Defendant has distributed or sold such products, and that such recall notices and other
13 actions be taken within five (5) days after service of judgment with notice of entry
14 thereof;

15 Q. Order Defendant to deliver up all Accused Products for destruction;

16 R. Order the impounding and destruction of all of Defendant’s products that
17 infringe U.S. Patent No. 10,508,805;

18 S. Order the impounding and destruction of all of Defendant’s products that
19 infringe U.S. Patent No. 11,732,878;

20 T. Award JLC treble damages pursuant to 35 U.S.C. § 284;

21 U. Find the case to be exceptional pursuant to 28 U.S.C. § 285 and award
22 appropriate relief thereunder;

23 V. Award JLC its reasonable attorney’s fees;

24 W. Award JLC its costs, expenses, and interest;

25 X. Order Defendant to report their compliance with the foregoing to the
26 Court within thirty (30) days of judgment; and,

27 Y. For such other and further relief that the Court deems just and proper
28 under the circumstances.

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DATED: January 3, 2025

THOMPSON COBURN LLP

By: /s/ Lukas Sosnicki

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ALAN H. NORMAN (*pro hac vice*)
THADDEUS J. BLENKE (*pro hac vice*)
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JLC-TECH LLC

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DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, JLC hereby demands a trial by jury on all issues raised by the Complaint.

DATED: January 3, 2025

THOMPSON COBURN LLP

By: /s/ Lukas Sosnicki

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