

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

**ELECTRONIC EDISON
TRANSMISSION TECHNOLOGIES,
LLC,**

Plaintiff,

v.

**JAGUAR LAND ROVER NORTH
AMERICA, LLC,**

Defendant.

C.A. No.

JURY TRIAL DEMANDED

PATENT CASE

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Electronic Edison Transmission Technologies, LLC files this Original Complaint for Patent Infringement against Jaguar Land Rover North America, LLC, and would respectfully show the Court as follows:

I. THE PARTIES

1. Plaintiff Electronic Edison Transmission Technologies, LLC (“Electronic Edison” or “Plaintiff”) is a Wyoming limited liability company having an address at 1712 Pioneer Ave, Suite 500, Cheyenne, Wyoming, 82001.

2. On information and belief, Defendant Jaguar Land Rover North America, LLC (“Defendant” or “Jaguar Land Rover”) is a corporation with a place of business at 100 Jaguar Land Rover Way, Mahwah, New Jersey 07495, and registered agent at Corporation Service Company, at Princeton South Corporate Center, Suite 160, 100 Charles Ewing Blvd, Ewing, New Jersey 08628.

II. JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction, pursuant to due process and the New Jersey Long-Arm Statute, due at least to its business in this forum, including at least a portion of the infringements alleged herein at 100 Jaguar Land Rover Way, Mahwah, New Jersey 07495.

5. Without limitation, on information and belief, Defendant has derived revenues from its infringing acts occurring within New Jersey. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in New Jersey. Defendant has committed such purposeful acts and/or transactions in New Jersey such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

6. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant maintains a place of business at 100 Jaguar Land Rover Way, Mahwah, New Jersey 07495. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

7. For these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C. § 1400(b).

III. COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,448,603)

8. Plaintiff incorporates the above paragraphs herein by reference.

9. On September 20, 2016, United States Patent No. 9,448,603 (“the ‘603 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘603 Patent is titled “Transferring Power to a Mobile Device.” A true and correct copy of the ‘603 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10. Electronic Edison is the assignee of all right, title, and interest in the ‘603 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘603 Patent. Accordingly, Electronic Edison possesses the exclusive right and standing to prosecute the present action for infringement of the ‘603 Patent by Defendant.

11. The invention in the ‘603 Patent relates to the field of transferring power to a mobile device. (Ex. A at col. 1:36-37). In particular, it relates to a method for transferring power from one mobile device to another. (*Id.* at 1:37-39). The inventors recognized a problem in prior art of power transfer from donor devices using the prior art methods. (*Id.* at 1:40-49).

12. The inventors recognized that consumers today carry many portable or mobile devices for work and leisure. (*Id.* at 1:15-17). These devices require an electrical source to charge. (*Id.* at 1:17-22). Consumer might have a device that needs charging but no power source. (*Id.* at 1:24-27). However, consumers might have an additional mobile device that has a substantial battery on hand. (*Id.* at 1:27-31).

13. The inventors therefore developed a method that improved performance with regard to power transferring. (*Id.* at 1:35-37). Methods for transferring power require the configuration of the doner wireless power transfer mechanism on the donor mobile device using a wireless transmit software application as well as configuring a receptor wireless power transfer mechanism on the receptor mobile device using a wireless receive software application. The

method includes transferring power from donor mobile device to the receptor mobile device using the donor wireless power transfer mechanism and the receptor wireless power transfer mechanism. In addition, the method includes receiving and converting received power into electric current using the receptor wireless power transfer mechanism. (*Id.* at 1:50-63).

14. **Direct Infringement.** Upon information and belief, Defendant directly infringed and infringes claim 8 of the ‘603 patent in New Jersey, in this District, and elsewhere in the United States, at least through use and/or testing, by performing actions comprising at least performing the claimed power transmission method by performing the steps of the claimed invention using the Land Rover Wireless Charging. (“Accused Instrumentality”). The Land Rover Wireless Charging as used in the Land Rover Discovery Sport is described below as an example of infringement by the Land Rover Wireless Charging. The Land Rover Wireless Charging functions in the exact same way in Jaguar branded vehicles as well.

15. Defendant performs a method for transferring power to a receptor mobile device from a donor mobile device having a battery. For example, Jaguar Land Rover provides Qi-compatible wireless charging functionality in its vehicles (“donor mobile device”), such as Land Rover Discovery Sport (used herein as an exemplary infringing product), Range Rover, Range Rover Velar, Range Rover Sport, and Defender. In these vehicles, the integrated wireless charging system supplies electrical power to a Qi-compatible smartphone (“receptor mobile device”). Specifically, the Land Rover Discovery Sport includes a 15W Qi-wireless device charging pad (hereinafter referred to as the “pad”) that receives power from the vehicle's battery and converts it into a wireless charging signal. This is then transmitted to the smartphone through electromagnetic induction, allowing cable-free charging when the smartphone is placed on the pad, and initiates

charging of the smartphone (“transferring power to a receptor mobile device from a donor mobile device”).

Discovery Sport Dynamic S

KEY FEATURES

Included:

18" Style 5074 wheels

LED headlights

DuoLeather seats

12-way driver and 10-way passenger electric driver memory front seats with 2-way manual headrests

Wireless device charging

Digital Driver Display

(E.g., <https://www.landrover.com/discovery/discovery-sport/models-and-specifications.html>).

HOW DOES LAND ROVER QI WIRELESS CHARGING WORK?

It's amazing what they can do with wireless car charging technology nowadays. How does Qi wireless charging work? Let's take a look:

- The charger creates an alternating electromagnetic field with its induction coil.
- Your smartphone takes in the energy from that field through a tiny receiver.
- The smartphone then converts that energy back into electricity to feed the battery.

(E.g., <https://www.landroverpalmbeach.com/manufacturer-information/how-land-rover-wireless-charging-works/>).

The new Land Rover Discovery Sport offers wireless phone charging through a unique charging pad. The built-in mat is located in the center console and holds the phone securely in place. It's large enough to fit smartphones in a range of sizes. donor mobile device

This wireless technology makes use of Qi standards for the wireless transfer of power through resonant inductive coupling. The mobile device must be designed for wireless charging, so check your phone model for compatibility. The charging mat provides up to 15W of power and is only available on models with certain trim levels.

The new Discovery along with the Range Rover Velar, Range Rover, and Range Rover Sport comes with the option of adding a wireless phone charging cupholder. The charger is located on the center console, and it keeps the phone in plain view. It can accommodate phones up to 2.83 inches wide.

When you place your Qi-compatible Android or iOS smartphone into the cupholder, it'll charge at 15W. There's an LED light that comes on while charging and turns off when fully charged. The charging cupholder cannot be used to connect to InControl Apps or while using Android Auto or Apple CarPlay. A dealer like us must professionally install this optional accessory at Land Rover Glen Cove. receptor mobile device

(E.g., <https://www.landroverglencove.com/how-to/wireless-phone-charging.htm>).

Knowing how wireless charging works is only useful if you know how to use it! Charging your phone is quick and easy. Here's how to use the Qi wireless charging feature in your Land Rover vehicle:

1. Make sure your phone is Qi-enabled. receptor mobile device
2. When purchasing your Land Rover SUV, choose either the optional Qi wireless charging pad or cup holder. donor mobile device
3. Place your smartphone on the pad or in the cupholder. Both the pad and the cupholder are designed to hold a wide range of smartphone sizes.
4. The LED light will come on while the phone is charging and turn off when the charge is full.

(E.g., <https://www.landroverpalmbeach.com/manufacturer-information/how-land-rover-wireless-charging-works/>).



(E.g., <https://www.youtube.com/watch?v=MEcqskKW9EQ>).

WHICH LAND ROVER MODELS FEATURE AVAILABLE WIRELESS CHARGING?

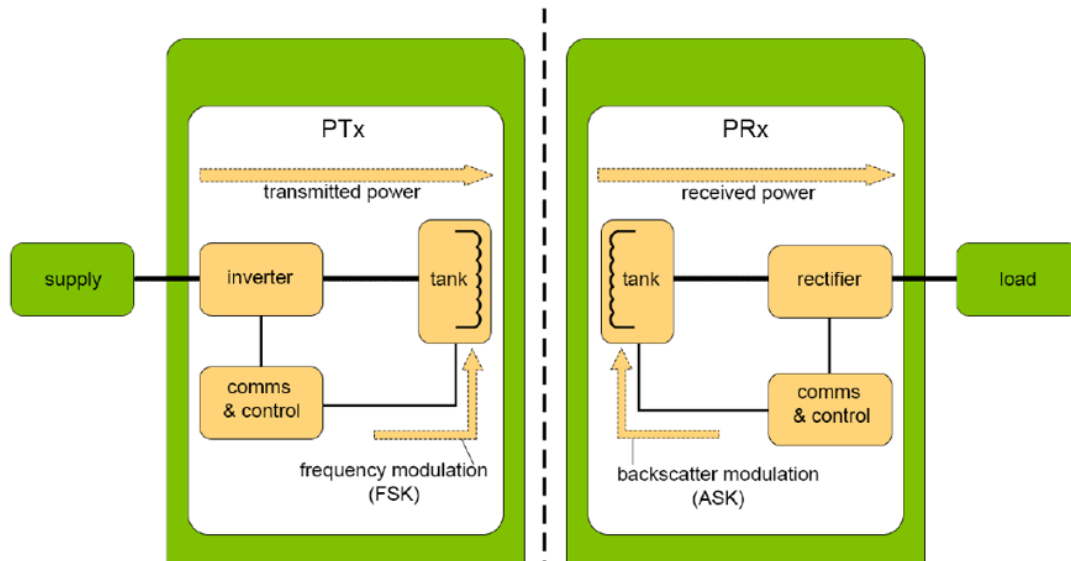
Qi wireless charging is available on the following Land Rover models:

- Discovery Sport
- Defender
- Range Rover
- Range Rover Velar
- Range Rover Sport

(E.g., <https://www.landroverpalmbeach.com/manufacture-information/how-land-rover-wireless-charging-works/>).

5. System Block Diagram

Figure 11 shows the key functional blocks of a wireless power system. The system's powertrain typically consists of a power supply, inverter, PTx and PRx resonant tanks, rectifier, and load. The power supply and load are external to the PTx and PRx proper. In a typical consumer system, the power supply is a USB wall adapter. In a typical automotive environment, the power supply is part of the car's electrical infrastructure. The load circuit design varies per application, but typically includes a battery within the PRx product that requires charging.



14.1 Transmitter Measurement Method

Measurement of the stand-by power shall proceed as follows:

1. Determine the average power consumption of the input source to the Power Transmitter Product over 1 hour in the case where there is no Power Receiver Product present on the Interface Surface of the Power Transmitter Product.

NOTE: The input source may consist of an AC adapter in the case of a mains-operated Power Transmitter Product or a DC adapter in the case of a battery-operated Power Transmitter Product, such as in automotive applications.

(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/qi-specification/download-the-qi-specifications/>).

16. Defendant performs the step of configuring a wireless power transfer mechanism on the receptor mobile device using a wireless receive application. For example, the wireless device charging pad integrated in the Land Rover Discovery Sport provides wireless charging functionality configured to wirelessly transfer power to the Qi-compatible smartphone (“the receptor mobile device”). When the receptor device, such as the Qi-compatible smartphone, is

placed on the charging pad within the vehicle, the pad initiates wireless power transfer, resulting in the receptor device being charged. Further, pursuant to the Qi wireless charging specifications, the power receiver (PRx) communicates with the power transmitter (TRx) by sending data packets that identify the desired power transfer level and facilitate device recognition through the exchange of identification codes. For example, where a receptor device capable of receiving up to 5W of power is placed on a donor device capable of transmitting up to 15W, the PRx communicates its power requirements such that only 5W of power is drawn. Following successful communication and configuration between the PRx and TRx, the wireless power transfer process is initiated. Therefore, upon information and belief, the smartphone's firmware that supports and initiates wireless charging includes a wireless receive application or corresponding software functionality configured to participate in the charging process, communicate charging parameters, and establish the intended power exchange with the charging pad ("configuring a wireless power transfer mechanism").



(E.g., <https://www.youtube.com/watch?v=MEcqskKW9EQ>).

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This wireless technology makes use of Qi standards for the wireless transfer of power through resonant inductive coupling. The mobile device must be designed for wireless charging, so check your phone model for compatibility. The charging mat provides up to 15W of power and is only available on models with certain trim levels.

The new Discovery along with the Range Rover Velar, Range Rover, and Range Rover Sport comes with the option of adding a wireless phone charging cupholder. The charger is located on the center console, and it keeps the phone in plain view. It can accommodate phones up to 2.83 inches wide.

When you place your Qi-compatible Android or iOS smartphone receptor mobile device into the cupholder, it'll charge at 15W. There's an LED light that comes on while charging and turns off when fully charged. The charging cupholder cannot be used to connect to InControl Apps or while using Android Auto or Apple CarPlay. A dealer like us must professionally install this optional accessory at Land Rover Glen Cove.

(E.g., <https://www.landroverglencove.com/how-to/wireless-phone-charging.htm>).

Knowing how wireless charging works is only useful if you know how to use it! Charging your phone is quick and easy. Here's how to use the Qi wireless charging feature in your Land Rover vehicle:

1. Make sure your phone is Qi-enabled. receptor mobile device
2. When purchasing your Land Rover SUV, choose either the optional Qi wireless charging pad or cup holder. donor mobile device
3. Place your smartphone on the pad or in the cupholder. Both the pad and the cupholder are designed to hold a wide range of smartphone sizes.
4. The LED light will come on while the phone is charging and turn off when the charge is full.

(E.g., <https://www.landroverpalmbeach.com/manufacturer-information/how-land-rover-wireless-charging-works/>).

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- The smartphone then converts that energy back into electricity to feed the battery.

(E.g., <https://www.landroverpalmbeach.com/manufacturer-information/how-land-rover-wireless-charging-works/>).

- Configuration phase: The PRx continues to send a sequence of data packets, providing information about the intended power transfer. The sequence includes the manufacturer code, which is a unique code registered with the WPC to identify the manufacturer of the PRx product. At the end of the configuration phase, the PTx and PRx create the power transfer contract governing the power phase. Immediately after, the power phase begins.
- Power phase: The PRx connects its load and starts to control the power transfer, sending data packets containing requests to increase or decrease the power level. In addition, it sends data packets containing its received power level, which are intended to help the PTx with foreign object detection (FOD; see [Section 9, Foreign Object Detection](#) for an introduction to this topic).

4. Qi wireless power transfer features

4.1 Power Levels

The *Qi Specification* applies to wireless power transfers of at least 5 W and up to the architectural limit of about 30 W of load power. The actual amount of power that can be transferred between the Power Transmitter and Power Receiver is subject to negotiation between them during the communication phases that occur before power transfer. The Power Receiver requests a certain amount of power appropriate for the device to be charged, and the Power Transmitter will deliver the requested amount. This communication assures interoperability between Qi wireless products in the Baseline Power Profile (≤ 5 W) and in the Extended Power Profile (up to 15 W).

For example, if the Power Receiver is designed to be charged by a 15 W Power Transmitter but is placed on a 5 W Power Transmitter, the Power Receiver may allow charging at a slower rate. Conversely, if a 5 W Power Receiver is placed on a 15 W Power Transmitter, the Power Receiver will instruct the Power Transmitter to send no more than 5 W of power.

(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/qi-specification/download-the-qi-specifications/>).

17. Defendant performs the step of determining a receptor power threshold using a wireless receive application. For example, the Land Rover Discovery Sport supports Qi-compliant smartphone devices, and as per the Qi standard of wireless power transfer, when the power is transmitted from a power transmitter (donor device) to a power receiver (receptor device), the power receiver, such as the smartphone, incorporates an output disconnect switch that activates

when the power receiver reaches its peak voltage. Further, the power receiver is designed to send an End Power Transfer Packet to the power transmitter when wireless power is no longer required, placing the transmitter in standby mode. Further, the power receiver (PRx) sends data packets to the power transmitter (TRx) for the intended power transfer level and device recognition by exchanging codes, such that if a 5W receptor device is placed on the 15W donor device, the PRx will only draw 5W power. Therefore, upon information and belief, the smartphone's firmware that supports and initiates wireless charging includes a wireless receive application for determining the power threshold of the receptor device.

Knowing how wireless charging works is only useful if you know how to use it! Charging your phone is quick and easy. Here's how to use the Qi wireless charging feature in your Land Rover vehicle:

1. Make sure your phone is Qi-enabled.
2. When purchasing your Land Rover SUV, choose either the optional Qi wireless charging pad or cup holder.
3. Place your smartphone on the pad or in the cupholder. Both the pad and the cupholder are designed to hold a wide range of smartphone sizes.
4. The LED light will come on while the phone is charging and turn off when the charge is full.

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An output disconnect switch, which prevents current from flowing to the output when the Power Receiver does not provide power at its output. In addition, the output disconnect switch prevents current back flow into the Power Receiver when the Power Receiver does not provide power at its output. Moreover, the output disconnect switch

(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/specifications/download-the-qi-specifications/>).

The Power Receiver shall have the means to disconnect its output from the subsystems connected thereto. If the Power Receiver has disconnected its output, it shall ensure that it still draws a sufficient amount of power from the Power Transmitter, such that Power Receiver to Power Transmitter communications remain possible (see *Qi Specification, Communications Physical Layer*).

The Power Receiver shall keep its output disconnected until it reaches the *power transfer* phase for the first time after a Digital Ping (see the *Qi Specification, Communications Protocol*). Subsequently, the Power Receiver may operate the output disconnect switch any time while the Power Transmitter applies a Power Signal.

NOTE: The Power Receiver may experience a voltage peak when operating the output disconnect switch (and changing between maximum and near-zero power dissipation).

(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/specifications/download-the-qi-specifications/>).

It is recommended that the Power Transmitter Product's power consumption in stand-by mode of operation meets the Energy Star EPS Requirements for "Energy consumption for No-Load" and the European Commission, Code of Conduct of Energy Efficiency of External Power Supplies for "No-load power consumption." It is also recommended that a Power Receiver is designed in a manner that when wireless power is not required, the Power Receiver will send an End Power Transfer Packet to put the Power Transmitter Product in stand-by mode.

(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/specifications/download-the-qi-specifications/>).

- *Configuration phase:* The PRx continues to send a sequence of data packets, providing information about the intended power transfer. The sequence includes the manufacturer code, which is a unique code registered with the WPC to identify the manufacturer of the PRx product. At the end of the configuration phase, the PTx and PRx create the power transfer contract governing the power phase. Immediately after, the power phase begins.
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18. Defendant performs the step of receiving power from the donor mobile device and converting received power into electric current using the wireless power transfer mechanism. For example, the Qi wireless power transfer system transfers power from the power transmitter (“receiving power from the donor mobile device”) to the power receiver using magnetic induction. Further, when charging begins, the coil inside the Power Receiver picks up the magnetic field, and a power converter transforms it back into a direct electrical current that charges the smartphone’s battery (“converting received power into electric current using the wireless power transfer mechanism”).

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(E.g., <https://www.landroverpalmbeach.com/manufacturer-information/how-land-rover-wireless-charging-works/>).

3. How Qi wireless power transfer works

3.1 Basic concepts

The Qi wireless power transfer system uses magnetic induction to transfer power from a Power Transmitter Product (charger) to a Power Receiver Product (smartphone).

(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/qi-specification/download-the-qi-specifications/>).

When charging begins, the Power Transmitter runs an alternating electrical current through its coil(s), which generates an alternating magnetic field in accordance with Faraday's law. This magnetic field is in turn picked up by the coil inside the Power Receiver and transformed by a power converter back into a direct electrical current that can be used to charge the battery.

A critical feature of the magnetic field is that it can transfer through any non-metallic, non-ferrous materials, such as plastics, glass, water, wood, and air. In other words, wires and connectors are not needed between the Power Transmitter Product and Power Receiver Product.

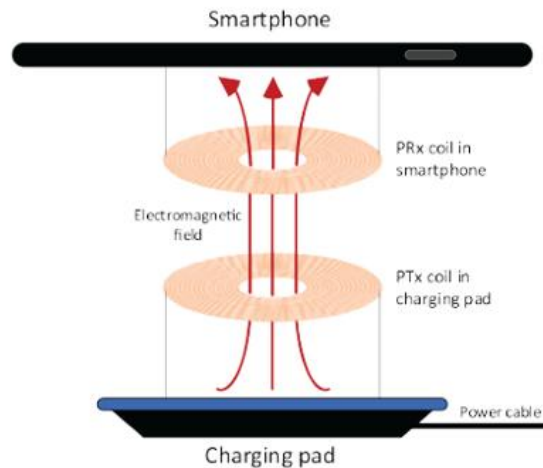


Figure 6 - Qi wireless power transfer using magnetic induction

(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/specifications/download-the-qi-specifications/>).

19. Defendant performs the method for transferring power to a receptor mobile device from a donor mobile device having a battery, wherein the wireless power transfer mechanism includes a power adapter having coil, circuit elements to transfer power and a capacitor to store electric charge that increases battery life when the capacitor is discharged. For example, in the Qi wireless power transfer system, the power transmitter circuitry includes a primary coil, a series capacitor, and an inverter. The power receiver circuitry includes a secondary coil, a series capacitor for efficient power transfer, a rectifier to convert the AC to DC, and a capacitor positioned directly after the rectifier (collectively, “circuit elements”) to facilitate charging of the receiver’s battery. The capacitor positioned after the rectifier charges (“a capacitor to store electric charge”) to approximately the peak input voltage of the rectifier and smooths the ripple in the rectified voltage.

The output power from the power receiver circuitry is delivered to the battery of the receptor device to increase the charge of the battery (“increases battery life”). Since the smoothing capacitor is responsible for transferring power from the secondary coil to the battery, it would be apparent to a person having ordinary skill in the art that the wireless power transfer mechanism includes a capacitor that discharges to provide a DC charging current to the smartphone’s battery, thereby increasing the battery life of the device.

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(E.g., <https://www.landroverpalmbeach.com/manufacturer-information/how-land-rover-wireless-charging-works/>).

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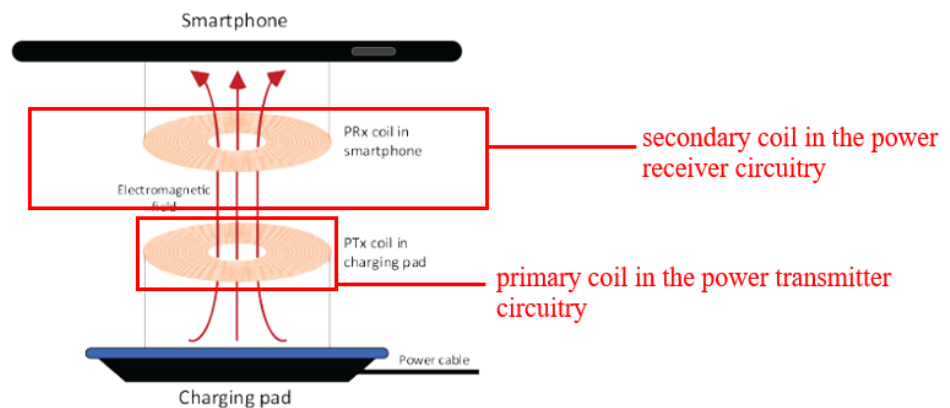
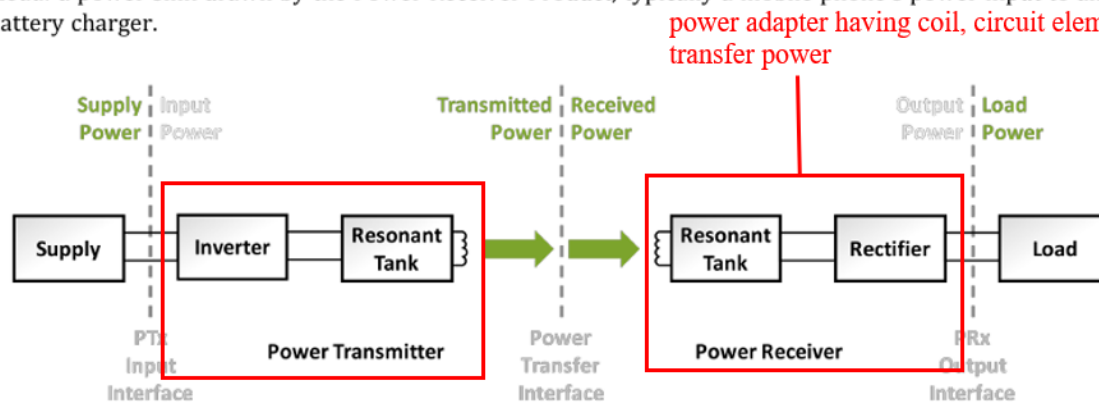


Figure 6 - Qi wireless power transfer using magnetic induction

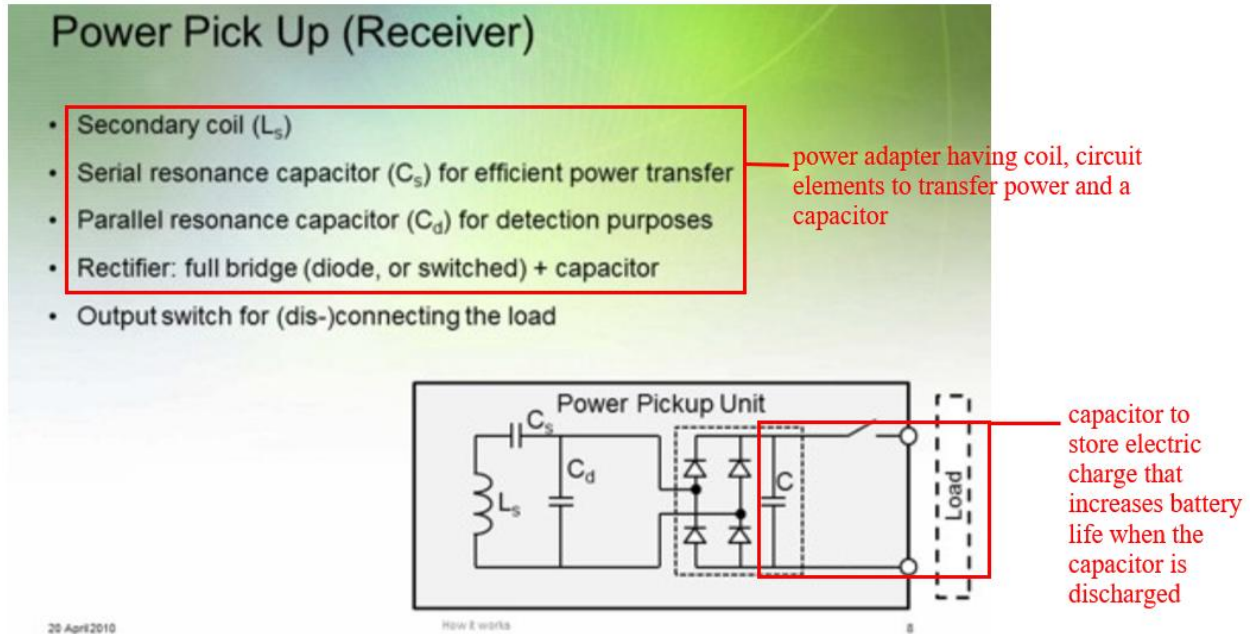
(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/specifications/download-the-qi-specifications/>).

- *Supply*: in many cases a separate adapter such as a USB PD brick.
- *Inverter*: a half-bridge or full-bridge for DC/AC conversion.
- *Resonant Tank*: a coil and series capacitor boosting the power transfer capability.
- *Rectifier*: either a diode bridge or an active (synchronous) bridge for AC/DC conversion.
- *Load*: a power sink drawn by the Power Receiver Product, typically a mobile phone's power input to an internal battery charger.



All practical Power Receiver implementations use a rectifier as part of the load circuit shown in Figure 11 (see also [Section 3.2, Rectification circuit](#)). Moreover, most Power Receiver implementations include a capacitor directly after this rectifier to smoothen the ripple on the rectified voltage. In combination with a high load impedance (low load current), this smoothing capacitor typically charges to a level approaching the peak voltage that is present at the input to the rectifier. When determining the appropriate (power-dependent) current limit this effect should be taken into account.

(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/specifications/download-the-qi-specifications/>).



(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/magnetic-induction/how-qi-works/>).

- **Power Signal**—An alternating magnetic field.
- **Supply Power**—The power dissipated from the supply.
- **Power Transmitter**—A subsystem that can generate a Power Signal.
- **Power Transmitter Product**—A device containing one or more Power Transmitters.
- **Transmitted Power**—The power from the Power Signal dissipated by any object that is not an integral part of the Power Transmitter Product.
- **Power Receiver**—A subsystem that can extract electric power from a Power Signal.
- **Power Receiver Product**—A device containing a Power Receiver.
- **Received Power**—The power from the Power Signal dissipated by any component that is an integral part of the Power Receiver Product.
- **Test Power Transmitter**—A Power Transmitter Product designed to analyze and check the operation of a Power Receiver Product's wireless power functionality.
- **Test Power Receiver**—A Power Receiver Product designed to analyze and check the operation of a Power Transmitter Product's wireless power functionality.
- **Load Power**—The power dissipated in the Load.

(E.g., <https://www.wirelesspowerconsortium.com/knowledge-base/specifications/download-the-qi-specifications/>).

20. **Indirect Infringement.** Upon information and belief, Defendant has been and now is indirectly infringing by way of inducing infringement and contributing to the infringement of

claim 8 of the '603 Patent in the State of New Jersey, in this District, and elsewhere in the United States, by providing the Accused Instrumentality for use as described above by Defendant's customers. Defendant advertised, offered for sale, and/or sold the Accused Instrumentality to its customers for use in a manner that Defendant knew infringed claim 8 of the '603 Patent. For example, Defendant provided marketing materials explaining that the Accused Instrumentality performs the claimed method for transferring power to a receptor mobile device from a donor mobile device having a battery as claimed in claim 8 of the '603 Patent. (*Supra* ¶¶15-19 (identifying marketing materials)).

21. On information and belief, since Defendant became aware of the '603 Patent and the infringement at least as of the date of the service of the Original Complaint, Defendant is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the Accused Instrumentality to its customers and by aiding and abetting its use as demonstrated by the marketing materials in a manner known to infringe by Defendant. Since becoming aware of the infringing use of the Accused Instrumentality, Defendant knew that the use of the Accused Instrumentality by its customers as instructed constituted direct patent infringement. Despite this knowledge, Defendant continued to encourage and induce its customers to use the Accused Instrumentality to infringe as described above and provided instructions for using the Accused Instrumentality to infringe, including through instructional materials, support, and user's guides. Exemplary materials are cited above. (*Supra* ¶¶15-19 (identifying marketing materials)). Defendant therefore knowingly induced infringement and specifically intended to encourage and induce the infringement of the '603 Patent by its customers.

22. On information and belief, since Defendant became aware of the infringement at least as of the date of the service of the Original Complaint, Defendant is and has been committing

the act of contributory infringement by intending to provide the identified Accused Instrumentality to its customers knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '603 Patent, and further knowing that the accused use of the Accused Instrumentality is not a staple article or commodity of commerce suitable for substantially non-infringing use. As described above, Defendant was aware that all material claim limitations are satisfied by the use and implementation of the Accused Instrumentality by Defendant's customers in the manner described above yet continued to provide the Accused Instrumentality to its customers knowing that it is a material part of the invention. (*Supra* ¶¶15-19 (identifying marketing materials)). As described above, since learning of the infringement, Defendant knew that the use and implementation of the Accused Instrumentality by its customers was made and adapted for infringement of the '603 Patent. (*Id.*). A new act of direct infringement occurred each time a customer implemented and/or used the Accused Instrumentality in the manner described above. After Defendant became aware that the use of the Accused Instrumentality infringes claim 8 of the '603 Patent, Defendant knew that each such new use was made and adapted for infringement of claim 8 of the '603 Patent and Defendant continued to advertise and provide the Accused Instrumentality for such infringing activities. (*Supra* ¶¶15-19 (identifying marketing materials)). Furthermore, as described more fully above, the Accused Instrumentality has functionality designed to perform the steps in the manner described above and is therefore not a staple article or commodity of commerce suitable for substantially non-infringing use. (*Id.*).

23. Plaintiff was damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '603 Patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest

and costs as fixed by this Court under 35 U.S.C. § 284.

24. On information and belief, Defendant had at least constructive notice of the ‘603 Patent by operation of law and marking requirements have been complied with. Electronic Edison is only asserting a method claim in this complaint and as such the marking requirements of 35 U.S.C. 287(a) do not apply and have thus been complied with. *Crown Packaging Technology, Inc. v. Rexam, Beverage Can Co.*, 559 F.3d 1308, 1316-1317 (Fed. Cir. 2009) (“Because Rexam asserted only the method claims of the ‘839 patent, the marking requirement of 35 U.S.C. 287(a) does not apply.”); *Hanson v. Alpine Valley Ski Area, Inc.*, 718 F.2d 1075, 1083 (Fed.Cir. 1983) (“It is ‘settled in the case law that the notice requirement of this statute does not apply where the patent is directed to a process or method.” (Quoting *Bandag, Inc. v. Gerrard Tire Co.*, 704 F.2d 1578, 1581, 217 USPQ 977, 979 (Fed. Cir. 1983)); *Intellectual Ventures I LLC v. Symantec Corp.*, 2015 U.S. Dist. LEXIS 6399 *3 (D.Del. Jan. 21, 2015).

IV. JURY DEMAND

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- a. Judgment that claim 8 of United States Patent No. 9,448,603 was infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant’s infringing activities and other conduct complained of herein;
- c. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant’s infringing activities and other conduct complained of herein; and

- d. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

July 27, 2026

Respectfully Submitted,

/s/ Antranig Garibian

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