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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION**
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11 Prosperina Ventures LLC, a Texas limited
liability company,

12
13 Plaintiff,

14 v.

15 MaxLite, Inc., a New Jersey corporation,

16 Defendant.
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Case No.

COMPLAINT:

1. **INFRINGEMENT OF U.S. PATENT NO. 9,137,866**
2. **INFRINGEMENT OF U.S. PATENT NO. 9,222,659**
3. **INFRINGEMENT OF U.S. PATENT NO. 9,310,030**
4. **INFRINGEMENT OF U.S. PATENT NO. 9,470,882**
5. **INFRINGEMENT OF U.S. PATENT NO. 9,651,239; and**
6. **INFRINGEMENT OF U.S. PATENT NO. 10,107,487**

DEMAND FOR JURY TRIAL

21 Plaintiff Prosperina Ventures LLC (“Prosperina”) by and through the undersigned counsel,
22 hereby files this complaint against Defendant MaxLite, Inc., (“MaxLite” or “Defendant”) for
23 patent infringement of United States Patent Nos. 9,137,866; 9,222,659; 9,310,030; 9,470,882;
24 9,651,239; and 10,107,487 (the “Patents-in-Suit”; attached hereto as Exhibits 1-6, respectively),
25 and alleges as follows:

26 **INTRODUCTION**

27 1. Prosperina owns by assignment all right, title and interest in numerous United
28 States and foreign patents, including the Patents-in-Suit.

1 Jr., Randall Levy Bernard, James Michael Lay, Nathan Ray Snell, and Paul Kenneth Pickard. A
2 true and correct copy of the '659 Patent is attached as Exhibit 2.

3 17. The '659 Patent is presumed valid under 35 U.S.C. § 282.

4 18. Prosperina owns all right, title, and interest in the '659 Patent.

5 19. On April 12, 2016, the USPTO duly and legally issued United States Patent No.
6 9,310,030 ("the '030 Patent") entitled "Non-uniform diffuser to scatter light into uniform emission
7 pattern" to inventor Tao Tong, Ronan Letoquin, Bernd Keller, Eric Tarsa, Mark Youmans,
8 Theodore Lowes, Nicholas W. Medendorp, JR., Anthony van de Ven, Gerald Negley, Peter
9 Guschl, and Zongjie Yuan. A true and correct copy of the '030 Patent is attached as Exhibit 3.

10 20. The '030 Patent is presumed valid under 35 U.S.C. § 282.

11 21. Prosperina owns all right, title, and interest in the '030 Patent.

12 22. On October 18, 2016, the USPTO duly and legally issued United States Patent No.
13 9,470,882 ("the '882 Patent") entitled "Optical arrangement for a solid-state lamp" to inventor
14 Dong Lu. A true and correct copy of the '882 Patent is attached as Exhibit 4.

15 23. The '882 Patent is presumed valid under 35 U.S.C. § 282.

16 24. Prosperina owns all right, title, and interest in the '882 Patent.

17 25. On May 16, 2017, the USPTO duly and legally issued United States Patent No.
18 9,651,239 ("the '239 Patent") entitled "LED lamp and heat sink" to inventors Paul Kenneth
19 Pickard, Bart P. Reier, Curt Progl, and Gerald H. Negley. A true and correct copy of the '239
20 Patent is attached as Exhibit 5.

21 26. The '239 Patent is presumed valid under 35 U.S.C. § 282.

22 27. Prosperina owns all right, title, and interest in the '239 Patent.

23 28. On October 23, 2018, the USPTO duly and legally issued United States Patent No.
24 10,107,487 ("the '487 Patent") entitled "LED light bulbs" to inventors George R. Brandes and
25 Julio A. Garceran. A true and correct copy of the '487 Patent is attached as Exhibit 6.

26 29. The '487 Patent is presumed valid under 35 U.S.C. § 282.

27 30. Prosperina owns all right, title, and interest in the '487 Patent.
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CLAIMS FOR RELIEF

Count I – Infringement of United States Patent No. 9,137,866

31. Prosperina repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

32. MaxLite (or those acting on its behalf) has infringed and is infringing, either literally or under the doctrine of equivalents, at least claim 1 of the ‘866 Patent in violation of 35 U.S.C. §§ 271 et seq., by making, using, offering for sale, and/or selling in the United States, and/or importing into the United States without authority or license, the Maxlite GuardMax Oval Security Wall Pack, and substantially similar products (collectively, the “‘866 Accused Products”).

33. As just one non-limiting example, set forth in Exhibit 7 is an exemplary claim chart evidencing Defendant’s infringement of claim 1 of the ‘866 Patent in connection with one of the ‘866 Accused Products (e.g., the Maxlite GuardMax Oval Security Wall Pack). This description is based on publicly available information. Prosperina reserves the right to modify this description, including, for example, on the basis of information about the ‘866 Accused Products that it obtains during discovery.

34. Prosperina is in compliance with any applicable marking and/or notice provisions of 35 U.S.C. § 287 with respect to the ‘866 Patent.

35. Prosperina is entitled to recover from Defendant all damages that it has sustained as a result of Defendant’s infringement of the ‘866 Patent, including, without limitation, a reasonable royalty.

Count II – Infringement of United States Patent No. 9,222,659

36. Prosperina repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

37. MaxLite (or those acting on its behalf) has infringed and is infringing, either literally or under the doctrine of equivalents, at least claim 1 of the ‘659 Patent in violation of 35 U.S.C. §§ 271 et seq., by making, using, offering for sale, and/or selling in the United States,

1 and/or importing into the United States without authority or license, the Maxlite PL G24Q 6W
2 Bulb, and substantially similar products (collectively, the “’659 Accused Products”).

3 38. As just one non-limiting example, set forth in Exhibit 8 is an exemplary claim chart
4 evidencing Defendant’s infringement of claim 1 of the ‘659 Patent in connection with one of the
5 ‘659 Accused Products (e.g., the Maxlite PL G24Q 6W Bulb). This description is based on
6 publicly available information. Prosperina reserves the right to modify this description, including,
7 for example, on the basis of information about the ‘659 Accused Products that it obtains during
8 discovery.

9 39. Prosperina is in compliance with any applicable marking and/or notice provisions
10 of 35 U.S.C. § 287 with respect to the ‘659 Patent.

11 40. Prosperina is entitled to recover from Defendant all damages that it has sustained as
12 a result of Defendant’s infringement of the ‘659 Patent, including, without limitation, a reasonable
13 royalty.

14 **Count III – Infringement of United States Patent No. 9,310,030**

15 41. Prosperina repeats, realleges, and incorporates by reference, as if fully set forth
16 here, the allegations of the preceding paragraphs above.

17 42. MaxLite (or those acting on its behalf) has infringed and is infringing, either
18 literally or under the doctrine of equivalents, at least claim 1 of the ‘030 Patent in violation of 35
19 U.S.C. §§ 271 et seq., by making, using, offering for sale, and/or selling in the United States,
20 and/or importing into the United States without authority or license, the Maxlite Par20 Bulb,
21 Maxlite MR16 Gu5.3 Floodlight, Maxlite Par38 Bulb, Maxlite Par30 Flood Lamp, and
22 substantially similar products (collectively, the “’030 Accused Products”).

23 43. As just one non-limiting example, set forth in Exhibit 9 is an exemplary claim chart
24 evidencing Defendant’s infringement of claim 1 of the ‘030 Patent in connection with one of the
25 ‘030 Accused Products (e.g., the Maxlite Par20 Bulb). This description is based on publicly
26 available information. Prosperina reserves the right to modify this description, including, for
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1 example, on the basis of information about the ‘030 Accused Products that it obtains during
2 discovery.

3 44. Prosperina is in compliance with any applicable marking and/or notice provisions
4 of 35 U.S.C. § 287 with respect to the ‘030 Patent.

5 45. Prosperina is entitled to recover from Defendant all damages that it has sustained as
6 a result of Defendant’s infringement of the ‘030 Patent, including, without limitation, a reasonable
7 royalty.

8 **Count IV – Infringement of United States Patent No. 9,470,882**

9 46. Prosperina repeats, realleges, and incorporates by reference, as if fully set forth
10 here, the allegations of the preceding paragraphs above.

11 47. MaxLite (or those acting on its behalf) has infringed and is infringing, either
12 literally or under the doctrine of equivalents, at least claim 1 of the ‘882 Patent in violation of 35
13 U.S.C. §§ 271 et seq., by making, using, offering for sale, and/or selling in the United States,
14 and/or importing into the United States without authority or license, the Maxlite Par30 Flood
15 Lamp, Maxlite MR16 Gu5.3 Floodlight, Maxlite Par20 Bulb, Maxlite Par38 Bulb, and
16 substantially similar products (collectively, the “‘882 Accused Products”).

17 48. As just one non-limiting example, set forth in Exhibit 10 is an exemplary claim
18 chart evidencing Defendant’s infringement of claim 1 of the ‘882 Patent in connection with one of
19 the ‘882 Accused Products (e.g., the Maxlite Par30 Flood Lamp). This description is based on
20 publicly available information. Prosperina reserves the right to modify this description, including,
21 for example, on the basis of information about the ‘882 Accused Products that it obtains during
22 discovery.

23 49. Prosperina is in compliance with any applicable marking and/or notice provisions
24 of 35 U.S.C. § 287 with respect to the ‘882 Patent.

25 50. Prosperina is entitled to recover from Defendant all damages that it has sustained as
26 a result of Defendant’s infringement of the ‘882 Patent, including, without limitation, a reasonable
27 royalty.
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Count V – Infringement of United States Patent No. 9,651,239

51. Prosperina repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

52. MaxLite (or those acting on its behalf) has infringed and is infringing, either literally or under the doctrine of equivalents, at least claim 1 of the ‘239 Patent in violation of 35 U.S.C. §§ 271 et seq., by making, using, offering for sale, and/or selling in the United States, and/or importing into the United States without authority or license, the Maxlite MR16 Gu5.3 Floodlight, Maxlite 60W 3000K Puck Lamp, Maxlite Par30 Flood Lamp, and substantially similar products (collectively, the “‘239 Accused Products”).

53. As just one non-limiting example, set forth in Exhibit 11 is an exemplary claim chart evidencing Defendant’s infringement of claim 1 of the ‘239 Patent in connection with one of the ‘239 Accused Products (e.g., the Maxlite MR16 Gu5.3 Floodlight). This description is based on publicly available information. Prosperina reserves the right to modify this description, including, for example, on the basis of information about the ‘239 Accused Products that it obtains during discovery.

54. Prosperina is in compliance with any applicable marking and/or notice provisions of 35 U.S.C. § 287 with respect to the ‘239 Patent.

55. Prosperina is entitled to recover from Defendant all damages that it has sustained as a result of Defendant’s infringement of the ‘239 Patent, including, without limitation, a reasonable royalty.

Count VI – Infringement of United States Patent No. 10,107,487

56. Prosperina repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

57. MaxLite (or those acting on its behalf) has infringed and is infringing, either literally or under the doctrine of equivalents, at least claim 1 of the ‘487 Patent in violation of 35 U.S.C. §§ 271 et seq., by making, using, offering for sale, and/or selling in the United States, and/or importing into the United States without authority or license, the Maxlite 60W 3000K Puck

1 Lamp, Maxlite G25 Lamp, Maxlite MR16 Gu5.3 Floodlight, Maxlite Par20 Bulb, Maxlite Par38
2 Bulb, Maxlite Par30 Flood Lamp, and substantially similar products (collectively, the “‘487
3 Accused Products”).

4 58. As just one non-limiting example, set forth in Exhibit 12 is an exemplary claim
5 chart evidencing Defendant’s infringement of claim 1 of the ‘487 Patent in connection with one of
6 the ‘487 Accused Products (e.g., the Maxlite 60W 3000K Puck Lamp). This description is based
7 on publicly available information. Prosperina reserves the right to modify this description,
8 including, for example, on the basis of information about the ‘487 Accused Products that it obtains
9 during discovery.

10 59. Prosperina is in compliance with any applicable marking and/or notice provisions
11 of 35 U.S.C. § 287 with respect to the ‘487 Patent.

12 60. Prosperina is entitled to recover from Defendant all damages that Prosperina has
13 sustained as a result of Defendant’s infringement of the ‘487 Patent, including, without limitation,
14 a reasonable royalty.

15 **JURY DEMANDED**

16 61. Pursuant to Federal Rule of Civil Procedure 38(b), Prosperina hereby requests a
17 trial by jury on all issues so triable.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiff respectfully requests:

20 a. That judgment be entered that Defendant has infringed at least one or more
21 claims of the patents-in-suit, directly and/or indirectly, literally and/or under the doctrine of
22 equivalents;

23 b. An award of damages sufficient to compensate Prosperina for Defendant’s
24 infringement under 35 U.S.C. § 284;

25 c. Costs and expenses in this action;

26 d. An award of prejudgment and post-judgment interest; and

27 e. Such other and further relief as the Court may deem just and proper.
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1 Date: August 5, 2026

Respectfully submitted,

2 **KEY KESAN DALLMANN PLLC**

3 /s/ Andrew S. Dallmann

4 Andrew S. Dallmann

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13 ***Prosperina Ventures LLC***

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury in the instant action.

DATED: August 5, 2026

KEY KESAN DALLMANN PLLC

By: /s/ Andrew S. Dallmann

Andrew S. Dallmann

Attorneys for Plaintiff

Prosperina Ventures LLC