

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**XIAOBING WANG AND LIANGQING
LI,**

Plaintiffs,

v.

**INDIVIDUALS, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
ON SCHEDULE “A,”**

Defendants.

Case No. 23cv15417

AMENDED COMPLAINT FOR PATENT INFRINGEMENT

This is an action for patent infringement in which Xiaobing Wang and Liangqing Li (collectively, “Plaintiffs”) accuse the Individuals, Partnerships, and Unincorporated Associations on Schedule A (“Defendants”) of infringing U.S. Patent No. [REDACTED] (the “Patent-in-Suit” or the “[REDACTED]”) under 35 U.S.C. §271, alleging as follows:

PARTIES

1. Plaintiffs are the inventors of the Patent-in-Suit who live in the People’s Republic of China.
2. Defendants are individuals and entities who sell and/or offer to sell infringing products through various “storefronts” via online retail websites accepting US Dollars.
3. At present, many of the Defendants can only be identified through their storefronts and other limited publicly available information. Plaintiffs will voluntarily

amend its Complaint as needed if Defendants provide additional credible information regarding their identities.

JURISDICTION AND VENUE

4. This is an action for infringement of the Patents-in-Suit arising under 35 U.S.C. §§ 271(a), 281, and 284 - 85. This Court has subject matter jurisdiction over this action under 28 U.S.C. §1331 and §1338(a).

5. Each Defendant sells and/or offers to sell infringing products through various “storefronts” via online retail websites accepting US Dollars through Amazon.com, eBay.com, and Walmart website platforms through which each Defendant targets residents in this judicial district and, upon information and belief, ships infringing products to residents within the Northern District of Illinois. Thus, each Defendant is committing, *inter alia*, patent infringement in this District.

6. Venue in the Northern District of Illinois is proper pursuant to 28 U.S.C. § 1391 because a substantial part of the events that give rise to the claim occur within this District, each Defendant has committed acts of infringement in and has significant contacts within this District, and each Defendant as delineated in Schedule A is selling or offering to sell the infringing products in the product listings targeted at this District.

7. In addition, on information and belief, each of the Defendants is a foreign entity or individual and "a defendant not resident in the United States may be sued in any judicial district " 28 U.S.C. § 1391(c)(3).

U.S. PATENT NO. [REDACTED]

8. On October 23, 2012, United States Patent No. [REDACTED] (the “[REDACTED]”) was duly and legally issued by the United States Patent and Trademark

Office for an invention entitled “[REDACTED].” A true and correct copy of the [REDACTED] is attached hereto as Exhibit A.

9. Xiaobing Wang and Liangqing Li are the inventors and owners of the [REDACTED].

COUNT I
INFRINGEMENT OF U.S. PATENT NO. [REDACTED]

10. Defendants directly or through intermediaries offer to sell and/or sell magnetic suspension lamps which infringe the [REDACTED], examples shown in Exhibits A-1 to A-5.

11. Upon information and belief, Defendants have been and are now infringing claims 1, 2, 3, and 8 of the [REDACTED] in the State of Illinois, in this judicial district, and other jurisdictions in the United States by selling or offering to sell the infringing magnetic suspension devices. The Defendants are directly infringing, literally infringing, and/or infringing the [REDACTED] under the doctrine of equivalents.

12. The infringing products directly infringe claim 1 of the [REDACTED]. For example, they are magnetic suspension devices that include a magnetic base and a suspension body; the suspension body being suspended above the magnetic base, the suspension body being provided with a receiving coil and at least one luminous body; the magnetic base being provided with a transmitting coil, the transmitting coil transmitting an AC signal to the receiving coil; the receiving coil converting the AC signal transmitted by the transmitting coil into electric energy and supplying the electric energy to the luminous body for emitting light, wherein the suspension body is provided with a plurality of luminous bodies; the luminous bodies adopt LED lamps which are arranged inside the suspension body or on the suspension body, and are connected with the receiving coil by

electric connection, wherein a permanent magnet is arranged inside the suspension body, and the permanent magnet is arranged symmetrically around the barycenter vertical of the suspension body, wherein the suspension body comprises an upper case, a lower case and a mounting ring arranged between the upper case and the lower case; a mounting part is arranged at the middle of the mounting ring, and the luminous bodies are mounted to the mounting part and are connected to the receiving coil via a connecting wire; the permanent magnet is an assembly of magnets, of which the lower end is a cylindrical magnet, and the upper end is several overlapped circular magnets; the middle of the receiving coil is provided with a through hole corresponding to the cylindrical magnet of the permanent magnet; the lower case is provided with a fixing pillar corresponding to the cylindrical magnet, and the middle of the fixing pillar is provided with a fixing hole; the cylindrical magnet passes through the through hole of the receiving coil, and then is inserted into the fixing hole; the permanent magnet is fixed at the lower end of the lower case; the receiving coil is sleevingly arranged to the outer side of the cylindrical magnet. *See Exhibits A-1 to A-5.*

13. The infringing products directly infringe claim 2 of the [REDACTED]. For example, the suspension body is a lamp. *See Exhibits A-1 to A-5.*

14. The infringing products directly infringe claim 3 of the [REDACTED]. For example, a transmitting circuit board is arranged inside the magnetic base of the infringing product, and the transmitting circuit board is arranged correspondingly to the transmitting coil. *See Ex. Exhibits A-1 to A-5.*

15. The infringing products directly infringe claim 8 of the [REDACTED]. For example, they are magnetic suspension devices including a magnetic base and a suspension

body; the suspension body being suspended above the magnetic base, the suspension body being provided with a receiving coil and at least one luminous body; the magnetic base being provided with a transmitting coil, the transmitting coil transmitting an AC signal to the receiving coil; the receiving coil converting the AC signal transmitted by the transmitting coil into electric energy and supplying the electric energy to the luminous body for emitting light, wherein a transmitting circuit board is arranged inside the magnetic base, and the transmitting circuit board is arranged correspondingly to the transmitting coil, wherein an annular ferrite is arranged inside the magnetic base; a plurality of suspension system coils, a plurality of magnetic heads embedded in the suspension system coils, and a magnetic suspension circuit board are arranged inside the magnetic base; the magnetic suspension circuit board is used to control the change of the magnetism of the suspension system coils and the magnetic heads; besides, a system sensor used to control the suspension of the suspension body, and a central sensor used to control the work of the system sensor are also arranged inside the magnetic base, wherein the side of the magnetic base is provided with a through hole, and a power converter is arranged at the through hole; the power converter is used for connecting with an external power supply to provide electricity to the magnetic suspension circuit board and the transmitting circuit board, wherein the magnetic base is cuboid, the lower opening of the magnetic base is provided with a base plate; a bracket is arranged in the magnetic base; the bracket comprises an upper mounting plate, a lower mounting plate, several connecting plates connecting the upper mounting plate and the lower mounting plate, and a mounting pillar connecting the middle parts of the upper mounting plate and the lower mounting plate; the middle of the mounting pillar is provided with a containing hole; the magnetic suspension circuit board

and the transmitting circuit board are arranged on the base plate, and are separately located at the two sides of the bracket; the ferrite is arranged to the outer side of the connecting plates by socket joint; the system sensor is contained in the containing hole, and the central sensor is arranged at the upper end of the containing hole correspondingly to the system sensor; the transmitting coil is arranged at the upper end face of the upper mounting plate. *See Exhibits A-1 to A-5.*

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully requests that this Court enter:

1. a judgment in favor of Plaintiffs that Defendants have infringed the Patents-in-Suit;
2. a permanent injunction enjoining Defendants and their officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement, inducing the infringement of, or contributing to the infringement of the Patents-in-Suit, or such other equitable relief the Court determines is warranted;
3. a judgment and order requiring Defendants pay to Plaintiffs their damages, costs, expenses, lost profits, and prejudgment and post-judgment interest for Defendants' infringement of the Patents-in-Suit as provided under 35 U.S.C. § 284, and an accounting of ongoing post-judgment infringement;
4. a determination that this is an exceptional case within the meaning of 35 U.S.C. § 285 and an award to Plaintiffs the costs, expenses, and reasonable attorneys' fees incurred in this action; and
5. that, upon Plaintiffs' request, all in privity with Defendants and with notice of the

injunction, including but not limited to any online marketplace platforms, such as Amazon.com, eBay.com, wish.com, and Walmart, and vendors of sponsored search terms or online ad-word providers, financial services providers, including but not limited to credit card providers, banks, merchant account providers, third party payment processors, web hosts, and Internet search engines, such as Google, Bing, and Yahoo shall:

- a. cease providing services used by Defendants, currently or in the future, to sell or offer for sale goods under the [REDACTED];
- b. cease displaying any advertisements in any form, connected or associated with Defendants in connection with the sale of infringing goods under the [REDACTED]; and
- c. disable all links to the marketplace accounts identified on Schedule A from displaying in search results, including from any search index.

DEMAND FOR JURY TRIAL

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

DATED October 30, 2023

Respectfully submitted,

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