

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

GUI GLOBAL PRODUCTS, LTD.	§	
D/B/A GWEE	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Case No. 4:20-cv-2624
	§	
SAMSUNG ELECTRONICS CO., LTD.,	§	
SAMSUNG TELECOMMUNICATIONS	§	
AMERICA, LLC, AND SAMSUNG	§	
ELECTRONICS AMERICA, INC.	§	
	§	
Defendants.	§	Jury Trial Requested

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff GUI Global Products, Ltd. d/b/a Gwee (“Gwee” or “Plaintiff”) hereby submits this Complaint for patent infringement against Defendants Samsung Electronics Co., Ltd., Samsung Telecommunications America, LLC, and Samsung Electronics America, Inc. (collectively “Samsung” or “Defendants”), and states as follows:

INTRODUCTION

1. This is a patent infringement case in which Gwee seeks compensation for Samsung’s infringement of Gwee’s U.S. Patent Nos. 10,589,320; 10,562,077; 10,259,021 and 10,259,020 (collectively the “patents-in-suit”).

2. Gwee and the Gwee® line of touchscreen, earbuds, optical microfiber cleaning products, exercise devices, and medical products are at least primarily the brainchild of inventor Walter G. Mayfield of Houston, Texas. Mr. Mayfield is the manager of GUI Global Management, LLC, which is the Managing General Partner of GUI Global Products, Ltd.

3. After many weekends spent in his garage and kitchen developing prototypes, Mr. Mayfield decided that a business could be created from some of his innovative products. He then explored the commercialization of a new line of cleaning and switching products for touch screen devices and earbuds including with a magnetic cord manager that offered convenience, portability and performance. With the addition of entrepreneur and former business owner, Dan Valdez, Gwee was founded. Mr. Valdez served as President of Gwee and is a co-inventor on the patents-in-suit. Since its founding, Gwee has developed an even more robust portfolio of innovative products including an exercise device through its subsidiary GweeGym, LLC and a patented liquid indicating medical bandage through its subsidiary Dry See, Inc. Brand names of some of Gwee's products, including through its subsidiaries, include Sport Guppy™, Gwee Button™, Gwee Keyring™, Gwee Leaf™, Gwee Racer™, Gwee Racercase™, Gwee Budz™, Gwee Button Dock™, Gwee Gym™, and Dry See®.

4. Mr. Mayfield and Mr. Valdez combined their inventive efforts to create and refine a portfolio of Gwee products, continued to build the company, and began to implement the go-to market strategy. With the hard work of Mr. Mayfield, Mr. Valdez and others, Gwee affirmed its place in the market.

5. Mr. Mayfield and Mr. Valdez are not only entrepreneurs and successful businessmen, they are also successful inventors. Mr. Mayfield is a named inventor on fifteen United States patents, including ten patents in which Mr. Valdez and Mr. Mayfield are co-inventors. These ten patents include the four patents-in-suit.

6. The Samsung products that infringe the patents-in-suit are the various iterations of Galaxy Buds and Galaxy Buds Plus products (hereinafter collectively referred to as "Galaxy Buds" or the "Samsung Infringing Products.>").

THE PATENTS-IN-SUIT

7. Gwee is the owner of all right, title and interest in the patents-in-suit, including the right to sue for past, present and future infringement thereof and to collect damages for any such past, present or future infringement. The inventions disclosed and claimed in the patents-in-suit provide numerous benefits over any prior existing systems comprising magnetic portable switching devices.

8. The matters described and claimed by U.S. Patent No. 10,589,320 generally include systems comprising a portable switching device selectively and magnetically coupled to a portable electronic device; wherein the electronic device comprises a circuit responsive to the switching device; the electronic device comprises at least one of beveled edges, ridges, recessed areas, grooves, slots, indented shapes, bumps, and raised shapes, which are configured to correspond to complementary surface elements on the switching device; wherein the portable switching device is configured to activate, deactivate, or send into hibernation the portable electronic device; wherein the electronic device plays or pauses a remote device; wherein the switching device includes a lid and hinge; wherein the lid is recessed to configure to the electronic device; and wherein the case of the switching device, including its hinged lid, protects the electronic device. A more specific description of the matters claimed by this patent is detailed below.

9. The matters described and claimed by U.S. Patent No. 10,562,077 generally include systems comprising a portable switching device selectively and magnetically coupled to a portable electronic device; wherein the electronic device comprises a circuit responsive to the switching device; the electronic device comprises at least of beveled edges, ridges, recessed areas, grooves, slots, indented shapes, bumps and raised shapes, which are configured to correspond to

complementary surface elements on the switching device; wherein the portable switching device is configured to activate, deactivate, or send into hibernation the portable electronic device; wherein the electronic device plays, pauses and/or controls the volume of a remote device; wherein the switching device includes a lid and hinge; wherein the lid is recessed to configure to the electronic device; and wherein the case of the switching device, including its hinged lid, protects the electronic device. A more specific description of the matters claimed by this patent is detailed below.

10. The matters described and claimed by U.S. Patent No. 10,259,021 generally include systems comprising a portable switching device magnetically and selectively coupled to a portable electronic device; wherein the electronic device comprises an electronic circuit that is responsive to the switching device; the electronic device comprises at least one of beveled edges, ridges, recessed areas, grooves, slots, indented shapes, bumps, and raised shapes, which are configured to correspond to complementary surface elements on the switching device; wherein the portable switching device is configured to activate, deactivate or send into hibernation the portable electronic device; and wherein the case of the switching device functions protects the electronic device. A more specific description of the matters claimed by this patent is detailed below.

11. The matters described and claimed by U.S. Patent No. 10,259,020 generally include systems comprising a portable switching device coupled to a portable electronic device; wherein: the switching device and the electronic device are configured to selectively couple to each other employing magnetic force from a first magnet disposed within the switching device; the switching device comprises a first case; the electronic device comprises a second case and an electronic circuit that is responsive to the switching device; the electronic device comprises at least one of beveled edges, ridges, recessed areas, grooves, slots, indented shapes, bumps and raised shapes

which are configured to correspond to complementary surface elements on the switching device; the portable switching device is configured to activate, deactivate or send into hibernation the portable electronic device; and wherein the case of the electronic device protects the switching device. A more specific description of the matters claimed by this patent is detailed below.

THE PARTIES

12. Gwee is a Texas limited partnership having its place of business at 1819 St. James Place in Houston, Texas.

13. Samsung Electronics Co., Ltd. (referred to individually herein as “SEC”) is a Korean corporation with its principal offices at 416 Maetan-3dong, Yeongtong-gu, Suwon-City, Gyeonggi-do, 443-742, South Korea. On information and belief, SEC designs, manufactures, and provides to the U.S. and world markets a wide range of products, including Galaxy Buds.

14. Samsung Telecommunications America, LLC (referred to individually herein as “STA”) is a Delaware limited liability company with its principal place of business at 1301 East Lookout Drive, Richardson, Texas 75082, with a registered agent at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

15. Samsung Electronics America, Inc. (referred to individually herein as “SEA”) is a New York corporation, having its principal place of business at 105 Challenger Road, Ridgefield Park, New Jersey 07660, and with a registered agent at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. SEA is a wholly owned subsidiary of SEC. On information and belief, effective January 1, 2015, SEA merged with STA.

16. Hereinafter, SEC, STA and SEA are collectively referred to as “Samsung.”

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