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18 Attorneys for Plaintiff
19 *Scramoge Technology Limited*

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 SCRAMOGE TECHNOLOGY LTD.,

23 Plaintiff,

24 vs.

25 ANKER INNOVATIONS LTD. and
26 FANTASIA TRADING LLC D/B/A
27 ANKERDIRECT,

28 Defendants.

Case No. 5:21-cv-01712

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

1 This is an action for patent infringement arising under the Patent Laws of the
2 United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Scramoge
3 Technology Limited (“Plaintiff” or “Scramoge”) makes the following allegations
4 against Defendants Anker Innovations Limited and Fantasia Trading LLC d/b/a
5 AnkerDirect (collectively, “Defendants” or “Anker”):

6 INTRODUCTION

7 1. This complaint arises from Anker’s unlawful infringement of the
8 following United States patents owned by Plaintiff, which relate to improvements in
9 wireless charging of mobile devices: United States Patent Nos. 9,490,652 (“the ‘652
10 Patent”), 10,193,392 (“the ‘392 Patent”), and 7,825,537 (“the ‘537 Patent”)
11 (collectively, the “Asserted Patents”).

12 PARTIES

13 2. Plaintiff Scramoge Technology Limited is a limited liability company
14 organized and existing under the law of Ireland, with its principal place of business
15 at The Hyde Building, Suite 23, The Park, Carrickmines, Dublin 18, Ireland.
16 Scramoge is the sole owner by assignment of all right, title, and interest in the
17 Asserted Patents, including the right to recover damages for past, present, and future
18 infringement.

19 3. On information and belief, Defendant Anker Innovations Limited is a
20 foreign corporation organized under the laws of Hong Kong, with its principal place
21 of business at Room 1318-19, Hollywood Plaza, 610 Nathan Road, Mongkok,
22 Kowloon, Hong Kong SAR, People’s Republic of China.

23 4. On information and belief, Defendant Fantasia Trading LLC d/b/a
24 AnkerDirect is a Delaware corporation, with a principal place of business at 5350
25 Ontario Mills Pkwy, Suite 100, Ontario, California 91764. Fantasia Trading LLC is
26 a wholly-owned subsidiary of Anker Innovations Limited and is registered to
27 conduct business in California.

28 JURISDICTION AND VENUE

1 No. 9,490,652, entitled “Wireless charger equipped with auxiliary power supply and
2 auxiliary power device.” The ’652 Patent was duly and legally issued by the United
3 States Patent and Trademark Office on November 8, 2016. A true and correct copy
4 of the ’652 Patent is attached as Exhibit 1.

5 10. On information and belief, Anker makes, uses, offers for sale, sells,
6 and/or imports certain products, including without limitation the Anker-branded
7 PowerCore 10K Wireless and PowerCore III 10K Wireless (“Accused Products”),
8 that directly infringe, literally and/or under the doctrine of equivalents, one or more
9 claims of the ’652 Patent. Identification of the accused products will be provided in
10 Plaintiff’s infringement contentions pursuant to the Court’s scheduling order.

11 11. The Accused Products satisfy all claim limitations of one or more
12 claims of the ’652 Patent. A claim chart comparing exemplary independent claim 1
13 of the ’652 Patent to representative Accused Products is attached as Exhibit 2.

14 12. By making, using, offering for sale, selling and/or importing into the
15 United States the Accused Products, Anker has injured Plaintiff and is liable for
16 infringement of the ’652 Patent pursuant to 35 U.S.C. § 271(a).

17 13. As a result of Anker’s infringement of the ’652 Patent, Plaintiff is
18 entitled to monetary damages (past, present, and future) in an amount adequate to
19 compensate for Anker’s infringement, but in no event less than a reasonable royalty
20 for the use made of the invention by Anker, together with interest and costs as fixed
21 by the Court.

22 COUNT II

23 INFRINGEMENT OF U.S. PATENT NO. 10,193,392

24 14. Plaintiff realleges and incorporates by reference the foregoing
25 paragraphs as if fully set forth herein.

26 15. Plaintiff owns by assignment all rights, title, and interest, including the
27 right to recover damages for past, present, and future infringement, in U.S. Patent
28 No. 10,193,392, entitled “Wireless power transfer device and wireless power

1 transfer system.” The ’392 Patent was duly and legally issued by the United States
2 Patent and Trademark Office on January 29, 2019. A true and correct copy of
3 the ’392 Patent is attached as Exhibit 3.

4 16. On information and belief, Anker makes, uses, offers for sale, sells,
5 and/or imports certain products, including without limitation the Anker-branded
6 PowerCore III 10K Battery Charger (“Accused Products”) that directly infringe,
7 literally and/or under the doctrine of equivalents, one or more claims of the ’392
8 Patent in violation of 35 U.S.C. § 271(a). Identification of the accused products will
9 be provided in Plaintiff’s infringement contentions pursuant to the Court’s
10 scheduling order.

11 17. The Accused Products satisfy all claim limitations of one or more
12 claims of the ’392 Patent. A claim chart comparing exemplary independent claim 1
13 of the ’392 Patent to representative Accused Products is attached as Exhibit 4.

14 18. By making, using, offering for sale, selling and/or importing into the
15 United States the Accused Products, Anker has injured Plaintiff and is liable for
16 infringement of the ’392 Patent pursuant to 35 U.S.C. § 271(a).

17 19. As a result of Anker’s infringement of the ’392 Patent, Plaintiff is
18 entitled to monetary damages (past, present, and future) in an amount adequate to
19 compensate for Anker’s infringement, but in no event less than a reasonable royalty
20 for the use made of the invention by Anker, together with interest and costs as fixed
21 by the Court.

22 COUNT III

23 INFRINGEMENT OF U.S. PATENT NO. 7,825,537

24 20. Plaintiff realleges and incorporates by reference the foregoing
25 paragraphs as if fully set forth herein.

26 21. Plaintiff owns by assignment all rights, title, and interest, including the
27 right to recover damages for past, present, and future infringement, in U.S. Patent
28 No. 7,825,537, entitled “Inductive power transfer system and method.” The ’537

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