

1 Plaintiffs ZAGG Inc (“ZAGG”) and MOPHIE, INC. (“mophie”)
2 (collectively “Plaintiffs”), by and through their undersigned attorneys, hereby
3 complain of Defendants Anker Technology Co. Ltd. and Fantasia Trading LLC
4 (collectively, “Defendants”) for infringement of the United States Patents
5 identified herein, and alleges as follows:

6 **I. JURISDICTION AND VENUE**

7 1. Jurisdiction and venue are proper over Defendants in this district
8 for the reasons set forth in this complaint.

9 2. This is an action for patent infringement arising under the patent
10 laws of the United States, Title 35, United States Code, and more particularly 35
11 U.S.C. §§ 271 and 281.

12 3. This Court has subject matter jurisdiction over this action pursuant
13 to 28 U.S.C. § 1331 and 1338(a).

14 4. This Court has personal jurisdiction over Defendants because
15 Defendants have a continuous, systematic, and substantial presence within this
16 judicial district, including by importing, selling, and offering for sale infringing
17 products in this judicial district and by committing acts of patent infringement in
18 this judicial district, including, but not limited to, importing and selling (at least
19 through its online store www.anker.com) infringing protective battery cases for
20 smartphones directly to consumers and/or retailers in this district and selling
21 into the stream of commerce knowing such products would be sold in this
22 district, which acts form a substantial part of the events or omissions giving rise
23 to Plaintiffs’ claim.

24 5. Venue is proper in this judicial district pursuant to 28 U.S.C.
25 §§ 1391(b) and (c), and 1400(b).

26 **II. PARTIES**

27 6. Plaintiffs reallege and incorporate herein by reference the
28 allegations stated in paragraphs 1–5 of this Complaint as if set forth fully herein.

1 7. ZAGG Inc is a corporation organized under the laws of the State of
2 Delaware, with its principal place of business at 910 West Legacy Center Way,
3 Suite 500, Midvale, Utah 84047.

4 8. ZAGG is an innovation leader in mobile technology accessories for
5 smartphones and tablets. ZAGG's commitment is to enhance every aspect of
6 performance, productivity and durability in mobile devices with creative
7 product solutions.

8 9. mophie, Inc. is a corporation organized under the laws of the State
9 of California, with its principal place of business at 15101 Red Hill Avenue,
10 Tustin, California 92780. mophie is a wholly owned subsidiary of ZAGG.

11 10. mophie designs and develops innovative products in the consumer
12 electronics area. These products include several protective battery case designs
13 for the iPhone sold by Apple, Inc. ("Apple") and other smartphones, which
14 provide both a protective case and a portable backup battery source that can
15 recharge the smartphone if its internal battery is drained of power. Throughout
16 the United States, mophie is a market leader in protective battery case products
17 for the iPhone and other smartphones.

18 11. Upon information and belief, Defendant Anker Technology Co.
19 Ltd. is a company organized under the laws of Hong Kong having a principal
20 place of business at Rm 1318-19, Hollywood Commercial Center, 610 Nathan
21 Road, Mongkok Kowloon, Hong Kong. Upon information and belief, Mr.
22 Meng (Steven) Yang is the founder and Chief Executive Officer of Anker
23 Technology Co. Ltd.

24 12. Upon information and belief, Defendant Fantasia Trading LLC is a
25 Delaware corporation with a principal place of business at 9155 Archibald Ave
26 ste 202, Rancho Cucamonga, California 91730. Upon information and belief,
27 Mr. Meng (Steven) Yang is the founder of Fantasia Trading LLC. According to
28 Fantasia Trading LLC's Statement of Information filed with the California

1 Secretary of State on June 15, 2017, Mr. Meng Yang is the Chief Executive
2 Officer of Fantasia Trading LLC, having an address at 9155 Archibald Ave ste
3 202, Rancho Cucamonga, California, 91730.

4 13. Upon information and belief, Fantasia Trading LLC is a wholly
5 owned subsidiary of Anker Technology Co., Ltd., a Hong Kong entity. On
6 information and belief, Anker Technology Co. Ltd. is a wholly owned
7 subsidiary of Anker Holding Ltd., a Cayman Islands entity. On information and
8 belief, Anker Holding Ltd. is a wholly owned subsidiary of Hunan Oceanwing
9 E-commerce, Ltd., a Hong Kong entity.

10 14. Upon information and belief, Defendants do business in this
11 judicial district and have committed acts of infringement in this judicial district.

12 **III. GENERAL ALLEGATIONS**

13 15. Plaintiffs reallege and incorporate herein by reference the
14 allegations stated in paragraphs 1–14 of this Complaint as if set forth fully
15 herein.

16 16. On March 3, 2015, the United States Patent and Trademark Office
17 duly and lawfully issued United States Patent No. 8,971,039 (“the ’039 Patent”),
18 entitled “Battery Pack, Holster, and Extendible Processing and Interface
19 Platform for Mobile Devices.” mophie is the true owner by assignment of all
20 right, title and interest in the ’039 Patent. A true and correct copy of the ’039
21 Patent is attached hereto as Exhibit 1.

22 17. On July 7, 2015, the United States Patent and Trademark Office
23 duly and lawfully issued United States Patent No. 9,077,013 (“the ’013 Patent”),
24 entitled “Battery Pack, Holster, and Extendible Processing and Interface
25 Platform for Mobile Devices.” mophie is the true owner by assignment of all
26 right, title and interest in the ’013 Patent. A true and correct copy of the ’013
27 Patent is attached hereto as Exhibit 2.

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1 23. Upon information and belief, in violation of 35 U.S.C. § 271(a),
2 Defendants have directly infringed and are continuing to directly infringe one or
3 more claims of the '039 Patent, including, without limitation, direct
4 infringement of Claim 14, by making, using, selling, offering for sale in the
5 United States, and/or importing into the United States, protective battery cases
6 for smartphones, including the Ultra Slim Extended Battery Case for iPhone 6 /
7 6s (4.7 inch) with 2850mAh capacity (“Anker Ultra Slim Extended Battery
8 Case”).

9 24. For example, the Anker Ultra Slim Extended Battery Case includes
10 all of the limitations of Claim 14 of the '039 Patent.

11 25. The Anker Ultra Slim Extended Battery Case is a case for an
12 electronic device having a lower case portion comprising a base surface upon
13 which a back of a housing of the electronic device will be placed against,
14 wherein the base surface comprises a top edge. A battery is enclosed in the
15 lower case portion, which includes electronic circuitry, coupled to the battery.
16 The lower case portion includes a lower sidewall, connected to the base surface
17 at an end opposite of the top edge, that will be positioned against a bottom side
18 edge of the electronic device. The lower case portion also includes an inner
19 connector, on the lower sidewall, positioned to connect to a connector of the
20 electronic device, and coupled through the electronic circuitry to the battery.
21 The lower case portion further includes an outer connector, positioned on an
22 outside bottom side of the lower case portion, coupled through the electronic
23 circuitry to the battery and inner connector. The case includes an upper case
24 portion comprising an upper sidewall that will be positioned against a top side
25 edge of the electronic device when the upper case portion is seated against the
26 lower case portion; and an open side end, opposite of the upper sidewall. The
27 upper case portion slides onto the lower case portion through the open side end
28 in a direction along the base surface from the top edge to the lower sidewall.

1 When the upper case portion is seated against the lower case portion, the upper
2 and lower case portions meet at and form a seam which extends across a back of
3 the case. When the upper case portion is seated against the lower case portion, a
4 first open-polygon-shaped opening for the lower case portion merges with a
5 second open-polygon-shaped opening for the upper case portion to form a front
6 opening of the case through which a screen of the electronic device will be
7 visible, the front opening having a closed shape. When the interface of the
8 mobile device is connected to the internal interface of the bottom section and the
9 screen of the mobile device faces up the battery cell is positioned under the back
10 of the housing of the mobile device.

11 26. Defendants' acts of infringement of the '039 Patent were
12 undertaken without permission or license from Plaintiffs.

13 27. As a direct and proximate result of Defendants' patent
14 infringement, Defendants' have derived and received gains, profits, and
15 advantages in an amount not presently known to Plaintiffs.

16 28. Pursuant to 35 U.S.C. § 284, Plaintiffs are entitled to damages for
17 Defendants' infringing acts with interest and costs as determined by this Court.

18 29. Due to the aforesaid infringing acts, Plaintiffs have suffered great
19 and irreparable injury, for which Plaintiffs have no adequate remedy at law.

20 30. Defendants will continue to directly infringe the '039 Patent to the
21 great and irreparable injury of Plaintiffs, unless enjoined by this Court.

22 **V. SECOND CLAIM FOR RELIEF**

23 (Infringement of U.S. Patent No. 9,077,013)

24 31. Plaintiffs reallege and incorporate herein by reference the
25 allegations stated in paragraphs 1–30 of this Complaint as if set forth fully
26 herein.

27 32. Upon information and belief, in violation of 35 U.S.C. § 271(a),
28 Defendants have directly infringed and are continuing to directly infringe one or

1 more claims of the '013 Patent, including, without limitation, direct
2 infringement of Claim 1, by making, using, selling, offering for sale in the
3 United States, and/or importing into the United States, protective battery cases
4 for smartphones, including the PowerCore Case for iPhone 7 (4.7 inch), 80%
5 Extra Battery (“Anker PowerCore Case, 80% Extra”) and PowerCore Case for
6 iPhone 7 (4.7 inch), 95% Extra Battery (“Anker PowerCore Case, 95% Extra”)
7 (collectively, “Anker PowerCore Cases”).

8 33. For example, the Anker PowerCore Cases include all of the
9 limitations of Claim 1 of the '013 Patent.

10 34. The Anker PowerCore Cases are battery cases for use with a
11 mobile electronic device. The battery case includes a battery; a back wall
12 configured to be positioned adjacent to at least a portion of a back side of a
13 mobile electronic device; a bottom wall configured to be positioned adjacent to
14 at least a portion of a bottom of the mobile electronic device; an upper wall
15 configured to be positioned adjacent to at least a portion of a top of the mobile
16 electronic device; a right side wall configured to be positioned adjacent to at
17 least a portion of a right side of the mobile electronic device; a left side wall
18 configured to be positioned adjacent to at least a portion of a left side of the
19 mobile electronic device; a front opening configured such that a display of the
20 mobile electronic device is visible through the front opening; a device interface
21 configured to engage a corresponding interface on the mobile electronic device,
22 wherein the battery is coupled to the device interface to provide electrical power
23 to the mobile electronic device through the device interface, and wherein the
24 device interface is configured to permit transfer of data to or from the mobile
25 electronic device; and an external interface configured to recharge the battery,
26 wherein the external interface is configured to enable the mobile electronic
27 device to communicate with an external device; wherein the upper wall is
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1 flexible to facilitate insertion of the mobile electronic device into the battery
2 case.

3 35. Defendants' acts of infringement of the '013 Patent were
4 undertaken without permission or license from Plaintiffs.

5 36. As a direct and proximate result of Defendants' patent
6 infringement, Defendants have derived and received gains, profits, and
7 advantages in an amount not presently known to Plaintiffs.

8 37. Pursuant to 35 U.S.C. § 284, Plaintiffs are entitled to damages for
9 Defendants' infringing acts with interest and costs as determined by this Court.

10 38. Due to the aforesaid infringing acts, Plaintiffs have suffered great
11 and irreparable injury, for which Plaintiffs have no adequate remedy at law.

12 39. Defendants will continue to directly infringe the '013 Patent to the
13 great and irreparable injury of Plaintiffs, unless enjoined by this Court.

14 **VI. THIRD CLAIM FOR RELIEF**

15 (Infringement of U.S. Patent No. 9,088,028)

16 40. Plaintiffs reallege and incorporate herein by reference the
17 allegations stated in paragraphs 1–39 of this Complaint as if set forth fully
18 herein.

19 41. Upon information and belief, in violation of 35 U.S.C. § 271(a),
20 Defendants have directly infringed and are continuing to directly infringe one or
21 more claims of the '028 Patent by making, using, selling, offering for sale in the
22 United States, and/or importing into the United States, protective battery cases
23 for smartphones, including the Anker Ultra Slim Extended Battery Case and
24 Premium Extended Battery Case for iPhone 6 / 6s (4.7 inch) with 3100mAh
25 Capacity (“Anker Premium Extended Battery Case”).

26 42. For example, the Anker Ultra Slim Extended Battery Case includes
27 all of the limitations of Claim 1 of the '028 Patent.

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1 43. The Anker Ultra Slim Extended Battery Case is a battery case for a
2 mobile electronic device. The battery case includes a lower portion and an
3 upper portion. The lower portion includes a back wall configured to extend
4 across at least a portion of a back side of a mobile electronic device; a battery
5 housed within a thickness of the back wall; a lower right side wall configured to
6 extend along a lower right side of the mobile electronic device; a lower left side
7 wall configured to extend along a lower left side of the mobile electronic device;
8 a bottom wall configured to extend along a bottom of the mobile electronic
9 device; and a device interface extending upward from the bottom wall. The
10 device interface is configured to engage a corresponding interface on the mobile
11 electronic device. The battery is coupled to the device interface to provide
12 electrical power to the mobile electronic device through the device interface.
13 The device interface is configured to permit transfer of data to or from the
14 mobile electronic device. The lower portion also includes an external interface
15 configured to recharge the battery. The external interface is configured to enable
16 the mobile electronic device to communicate with an external device. The
17 lower portion further includes a charge indicator configured to indicate the
18 charge status of the battery. The upper portion is configured to be movably
19 separated from the lower portion to facilitate insertion of the mobile electronic
20 device into the battery case. The upper portion includes a top wall configured to
21 extend along a top of the mobile electronic device; an upper right side wall
22 configured to extend along an upper right side of the mobile electronic device;
23 and an upper left side wall configured to extend along an upper left side of the
24 mobile electronic device. The upper portion and the lower portion are
25 configured to slide together to a closed position to form a cavity for housing the
26 mobile electronic device. The front opening of the battery case is configured
27 such that a display of the mobile electronic device is visible through the front
28 opening.

1 44. As another example, the Anker Ultra Slim Extended Battery Case
2 and the Anker Premium Extended Battery Case include all of the limitations of
3 Claim 11 of the '028 Patent.

4 45. The Anker Ultra Slim Extended Battery Case and the Anker
5 Premium Extended Battery Case are battery cases for a mobile electronic
6 device. The battery case includes a first portion and a second portion. The first
7 portion includes a back wall configured to extend across at least a portion of a
8 back side of a mobile electronic device; a battery housed within a thickness of
9 the back wall; a bottom wall configured to extend along a bottom of the mobile
10 electronic device; and a device interface extending upward from the bottom
11 wall. The device interface is configured to engage a corresponding interface on
12 the mobile electronic device. The battery is coupled to the device interface to
13 provide electrical power to the mobile electronic device through the device
14 interface. The device interface is configured to permit transfer of data to or from
15 the mobile electronic device. The first portion also includes an external
16 interface configured to recharge the battery. The external interface is
17 configured to enable the mobile electronic device to communicate with an
18 external device. The first portion further includes a charge indicator configured
19 to indicate the charge status of the battery. The second portion is configured to
20 engage the first portion in a closed position and configured to be movably
21 separated from the first portion in an open position. The closed position forms a
22 cavity for housing the mobile electronic device. The front opening of the
23 battery case is configured such that a display of the mobile electronic device is
24 visible through the front opening in the closed position. The open position is
25 configured to facilitate insertion of the mobile electronic device into the battery
26 case. The second portion includes a top wall configured to extend along a top of
27 the mobile electronic device; a right side wall configured to extend along a right
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1 side of the mobile electronic device; and a left side wall configured to extend
2 along a left side of the mobile electronic device.

3 46. Defendants' acts of infringement of the '028 Patent were
4 undertaken without permission or license from Plaintiffs.

5 47. As a direct and proximate result of Defendants' patent
6 infringement, Defendants have derived and received gains, profits, and
7 advantages in an amount not presently known to Plaintiffs.

8 48. Pursuant to 35 U.S.C. § 284, Plaintiffs are entitled to damages for
9 Defendants' infringing acts with interest and costs as determined by this Court.

10 49. Due to the aforesaid infringing acts, Plaintiffs have suffered great
11 and irreparable injury, for which Plaintiffs have no adequate remedy at law.

12 50. Defendants will continue to directly infringe the '028 Patent to the
13 great and irreparable injury of Plaintiffs, unless enjoined by this Court.

14 **VII. FOURTH CLAIM FOR RELIEF**

15 (Infringement of U.S. Patent No. 9,088,029)

16 51. Plaintiffs reallege and incorporate herein by reference the
17 allegations stated in paragraphs 1–50 of this Complaint as if set forth fully
18 herein.

19 52. Upon information and belief, in violation of 35 U.S.C. § 271(a),
20 Defendants have directly infringed and are continuing to directly infringe one or
21 more claims of the '029 Patent, including, without limitation, direct
22 infringement of Claim 1, by making, using, selling, offering for sale in the
23 United States, and/or importing into the United States, protective battery cases
24 for smartphones, including the Anker Ultra Slim Extended Battery Case, Anker
25 Premium Extended Battery Case, and Anker PowerCore Cases.

26 53. For example, the Anker Ultra Slim Extended Battery Case, Anker
27 Premium Extended Battery Case, and Anker PowerCore Cases include all of the
28 limitations of Claim 1 of the '029 Patent.

1 54. The Anker Ultra Slim Extended Battery Case, Anker Premium
2 Extended Battery Case, and Anker PowerCore Cases are battery cases for use
3 with a mobile electronic device. The battery case includes a housing configured
4 to at least partially enclose the mobile electronic device. The housing comprises
5 a back wall configured to be positioned adjacent to at least a portion of a back
6 side of the mobile electronic device; a bottom wall configured to be positioned
7 adjacent to at least a portion of a bottom of the mobile electronic device; a top
8 wall configured to be positioned adjacent to at least a portion of a top of the
9 mobile electronic device; a right side wall configured to be positioned adjacent
10 to at least a portion of a right side of the mobile electronic device; a left side
11 wall configured to be positioned adjacent to at least a portion of a left side of the
12 mobile electronic device; and a front opening configured such that a display of
13 the mobile electronic device is visible through the front opening. A battery is
14 disposed within the housing. The battery case includes an internal interface
15 extending from the bottom wall and configured to engage a corresponding
16 interface on the mobile electronic device. The battery is coupled to the internal
17 interface to provide electrical power to the mobile electronic device through the
18 internal interface. The battery case also includes an external interface disposed
19 on an outside of the housing and configured to receive electrical power to
20 recharge the battery. The battery case further includes a user input element
21 configured to toggle the battery case between a charging configuration and a
22 non-charging configuration while the mobile electronic device is in the battery
23 case. The battery case is configured to deliver electrical power from the battery
24 to the mobile electronic device when in the charging configuration and to not
25 deliver electrical power from the battery to the mobile electronic device when in
26 the non-charging configuration.

27 55. Defendants' acts of infringement of the '029 Patent were
28 undertaken without permission or license from Plaintiffs.

1 left side wall configured to extend along at least a portion of a lower left side of
2 the mobile electronic device; a bottom wall configured to extend along at least a
3 portion of a bottom of the mobile electronic device; an open top side to facilitate
4 insertion of the mobile electronic device into the lower casing portion; and an
5 internal interface extending upward from the bottom wall. The internal
6 interface is configured to engage a corresponding interface on the mobile
7 electronic device. The battery is coupled to the internal interface to enable the
8 provision of electrical power to the mobile electronic device through the internal
9 interface. The internal interface is configured to permit transfer of data to or
10 from the mobile electronic device. The lower casing portion also includes an
11 external interface configured to receive electrical power to recharge the battery.
12 The external interface is electrically coupled to the internal interface to enable
13 the mobile electronic device to communicate with an external device via the
14 internal interface and the external interface while the mobile electronic device is
15 mounted in the protective battery case. The lower casing portion further
16 includes a user input element configured to enable a user to start and stop
17 charging from the battery to the mobile electronic device. The upper casing
18 portion is configured to removably couple to the lower casing portion to form a
19 casing that is configured to at least partially enclose the mobile electronic
20 device. The upper casing portion includes a top wall configured to extend along
21 at least a portion of a top of the mobile electronic device; an upper right side
22 wall configured to extend along at least a portion of an upper right side of the
23 mobile electronic device; and an upper left side wall configured to extend along
24 at least a portion of an upper left side of the mobile electronic device. The front
25 opening of the protective battery case is configured such that a display of the
26 mobile electronic device is visible through the front opening.

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1 64. As another example, the Anker Ultra Slim Extended Battery Case
2 and Anker Premium Extended Battery Case include all of the limitations of
3 Claim 11 of the '070 Patent.

4 65. The Anker Ultra Slim Extended Battery Case and Anker Premium
5 Extended Battery Case are protective battery cases for use with a mobile
6 electronic device. The protective battery case includes a first and second casing
7 portion. The first casing portion includes a battery; a back wall configured to
8 extend across at least a portion of a back side of a mobile electronic device; a
9 bottom wall configured to extend along at least a portion of a bottom of the
10 mobile electronic device; an open top side to facilitate insertion of the mobile
11 electronic device into the first casing portion; and an internal interface extending
12 from the bottom wall. The internal interface is configured to engage a
13 corresponding interface on the mobile electronic device. The battery is coupled
14 to the internal interface to provide electrical power to the mobile electronic
15 device through the internal interface. The internal interface is configured to
16 permit transfer of data to or from the mobile electronic device. The first casing
17 portion also includes an external interface configured to receive electrical power
18 to recharge the battery. The external interface is electrically coupled to the
19 internal interface to enable the mobile electronic device to communicate with an
20 external device via the internal interface and the external interface while the
21 mobile electronic device is mounted in the protective battery case. The first
22 casing portion also includes a user input element configured to enable a user to
23 start and stop charging from the battery to the mobile electronic device. The
24 second casing portion is configured to removably couple to the first casing
25 portion to form a casing that is configured to at least partially enclose the mobile
26 electronic device. The second casing portion includes a top wall configured to
27 extend along at least a portion of a top of the mobile electronic device; a right
28 side wall configured to extend along at least a portion of a right side of the

1 mobile electronic device; and a left side wall configured to extend along at least
2 a portion of a left side of the mobile electronic device. The front opening of the
3 protective battery case is configured such that a display of the mobile electronic
4 device is visible through the front opening.

5 66. Defendants' acts of infringement of the '070 Patent were
6 undertaken without permission or license from Plaintiffs.

7 67. As a direct and proximate result of Defendants' patent
8 infringement, Defendants have derived and received gains, profits, and
9 advantages in an amount not presently known to Plaintiffs.

10 68. Pursuant to 35 U.S.C. § 284, Plaintiffs are entitled to damages for
11 Defendants' infringing acts with interest and costs as determined by this Court.

12 69. Due to the aforesaid infringing acts, Plaintiffs have suffered great
13 and irreparable injury, for which Plaintiffs have no adequate remedy at law.

14 70. Defendants will continue to directly infringe the '070 Patent to the
15 great and irreparable injury of Plaintiffs, unless enjoined by this Court.

16 **IX. SIXTH CLAIM FOR RELIEF**

17 (Infringement of U.S. Patent No. 9,406,913)

18 71. Plaintiffs reallege and incorporate herein by reference the
19 allegations stated in paragraphs 1–70 of this Complaint as if set forth fully
20 herein.

21 72. Upon information and belief, in violation of 35 U.S.C. § 271(a),
22 Defendants have directly infringed and are continuing to directly infringe one or
23 more claims of the '913 Patent, including, without limitation, direct
24 infringement of Claim 1, by making, using, selling, offering for sale in the
25 United States, and/or importing into the United States, protective battery cases
26 for smartphones, including the Anker Ultra Slim Extended Battery Case.

27 73. For example, the Anker Ultra Slim Extended Battery Case includes
28 all of the limitations of Claim 1 of the '913 Patent.

1 74. The Anker Ultra Slim Extended Battery Case is a case for a mobile
2 device. It includes a bottom section that comprises a back wall upon which at
3 least a portion of a back of a housing of the mobile device will be placed
4 against, wherein the back wall comprises a top edge; a battery cell, enclosed in
5 the bottom section; electronic circuitry, coupled to the battery cell; a bottom
6 sidewall, connected to the back wall at an end opposite of the top edge, that will
7 be positioned against at least a portion of a bottom side edge of the mobile
8 device; an internal interface, on the bottom sidewall, positioned to connect to an
9 interface on the mobile device, and coupled through the electronic circuitry to
10 the battery cell; and an external interface, positioned on an outside of the bottom
11 section, coupled through the electronic circuitry to the battery cell and internal
12 interface. The case also includes a top section that comprises a top side that will
13 be positioned against at least a portion of a top side edge of the mobile device
14 when the top section is seated against the bottom section; and an open side end,
15 opposite of the top side, wherein the top section slides onto the bottom section
16 through the open side end, wherein when the top section is seated against the
17 bottom section, the top and bottom sections meet at and form a seam, which
18 extends across a back of the case. When the top section is seated against the
19 bottom section, a first open-polygon-shaped opening for the bottom section
20 merges with a second open-polygon-shaped opening for the top section to form
21 a front opening of the case through which a screen of the mobile device will be
22 visible, the front opening having a closed shape.

23 75. Defendants' acts of infringement of the '913 Patent were
24 undertaken without permission or license from Plaintiffs.

25 76. As a direct and proximate result of Defendants' patent
26 infringement, Defendants have derived and received gains, profits, and
27 advantages in an amount not presently known to Plaintiffs.

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1 4. That the Court award Plaintiffs such other and further relief as this
2 Court may deem just.

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4 Respectfully submitted,
5 KNOBBE, MARTENS, OLSON & BEAR, LLP

6 Dated: December 15, 2017 By: s/ Sheila N. Swaroop
7 Steven J. Nataupsky
8 Sheila N. Swaroop
9 Marko R. Zoretic
10
11 Attorneys for Plaintiffs
12 ZAGG INC and MOPHIE, INC.

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JURY DEMAND

Pursuant to Fed. R. Civ. P. 38(b), Plaintiffs ZAGG Inc and mophie, Inc. demand a trial by jury of all issues raised by this Complaint that are triable by jury.

Respectfully submitted,
KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: December 15,2017

By: s/ Sheila N. Swaroop
Steven J. Nataupsky
Sheila N. Swaroop
Marko R. Zoretic

Attorneys for Plaintiffs
ZAGG INC and MOPHIE, INC.

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