

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IPG PHOTONICS CORPORATION,

Plaintiff,

v.

TRUMPF SE + CO. KG, TRUMPF LASER
SE, and TRUMPF LASER UK LTD.,

Defendants.

Case No. 2:26-cv-00035

JURY TRIAL DEMANDED

**PLAINTIFF IPG PHOTONICS CORPORATION'S COMPLAINT FOR
PATENT INFRINGEMENT**

Plaintiff IPG Photonics Corporation ("IPG Photonics" or "Plaintiff"), for its complaint against Defendants Trumpf SE + Co. KG ("Trumpf SE"), Trumpf Laser SE, and Trumpf Laser UK Ltd. ("Trumpf Laser UK") (collectively, "Trumpf" or "Defendants"), alleges as follows:

NATURE OF THE ACTION

1. This is an action for infringement of United States Patent No. 9,356,415 (the "'415 patent") under the Patent Laws of the United States, 35 U.S.C. §§ 271, *et seq.* A true and accurate copy of the '415 patent is attached as Exhibit A.

PARTIES

2. Plaintiff IPG Photonics is a corporation organized and existing under the laws of Delaware, with a principal office located at 377 Simarano Drive, Marlborough, Massachusetts 01752. IPG Photonics is the inventor and world's leading producer of industrial fiber lasers that continue to revolutionize manufacturing around the globe. IPG fiber lasers are widely used in automotive, aerospace, energy sector, heavy industry, microelectronics, biomedical, scientific,

telecom, and many other fields. Founded 35 years ago, IPG commercialized commercial fibers lasers taking them from the laboratory to widespread use on the factory floor and elsewhere. IPG's pioneering innovation has consistently shaped the laser industry landscape, driving the widespread adoption of laser solutions across diverse applications and sectors. Renowned for producing the most energy-efficient lasers globally, IPG's lasers allow customers to reduce costs while contributing to energy savings and reductions in emissions. IPG established manufacturing facilities, application laboratories, and service centers in over 30 countries that are supported by a team of over 4,000 dedicated employees.

3. Defendant Trumpf SE is a German company with a principal place of business at Johann-Maus-Str. 2, 71254 Ditzingen, Germany.

4. Defendant Trumpf Laser SE is a German company with a principal place of business at Aichhalder Straße 39, 78713 Schramberg, Germany.

5. Defendant Trumpf Laser UK is a British company with a principal place of business at 3 Wellington Park, Tollbar Way, Hedge End, SO30 2 QU Southampton.

6. On information and belief, Trumpf SE is the parent company of Trumpf Laser SE and Trumpf Laser UK.

7. On information and belief, Defendant Trumpf SE owns and operates the website located on the domain www.trumpf.com.

JURISDICTION AND VENUE

8. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 271, *et seq.* This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.

9. This Court has personal jurisdiction over Defendants pursuant to the laws of the State of Texas, including Texas Civil Practice and Remedies Code § 17.042.10, because

Defendants are engaged in substantial and not isolated activity within the State of Texas. This Court has specific jurisdiction over Defendants because Defendants (a) have committed acts of infringement in the State of Texas giving rise to this action; and (b) have established more than minimum contacts within the State of Texas, such that exercise of jurisdiction over Trumpf in this Court would not offend traditional notions of fair play and substantial justice.

10. For example, Trumpf's website touts long-standing customer relationships in Texas.^{1 2}



To meet customer requirements for high quality metal fabrication services and manufacturing solutions, the OMS team employs the industry's most advanced manufacturing equipment and processing capabilities. And of course, that includes technology from TRUMPF. More than thirty-seven TRUMPF flatsheet laser cutting machines, tube laser cutting machines, and press brakes are used at OMS facilities in Alabama, Iowa, Indiana, Kentucky, Ohio, Pennsylvania, North Carolina, Texas, and Monterrey, Mexico to support work done for large OEMs and contractors.

¹ https://www.trumpf.com/filestorage/TRUMPF_US/Corporate/Corporate_Brochures_and_publications/TRUe_Summer_2023_Beginnings.pdf, last accessed January 12, 2026; last archived on June 17, 2025 at https://web.archive.org/web/20250617204341/https://www.trumpf.com/filestorage/TRUMPF_US/Corporate/Corporate_Brochures_and_publications/TRUe_Summer_2023_Beginnings.pdf.

² https://www.trumpf.com/filestorage/TRUMPF_US/Product_Brochures_and_publications/TRUe_Fall2019_111819_LR.pdf, last accessed January 12, 2026; last archived on June 17, 2025 at https://web.archive.org/web/20250617204341/https://www.trumpf.com/filestorage/TRUMPF_US/Product_Brochures_and_publications/TRUe_Fall2019_111819_LR.pdf.

*Forming partnerships in Fort Worth to navigate
a tough path to success*

GROWING FAITHFULLY

Everything is bigger in Texas. With one million square feet of manufacturing space producing more than a million parts annually, Fort Worth-based Anchor Fabrication fits the stereotype. A closer look reveals the hard work and determination that has transformed the company from a small job shop to a growing contract manufacturer eager to acquire additional businesses. Navigating obstacles to growth and identifying the right partners and opportunities has put Anchor on a course to success.



11. In turn, multiple businesses in Texas and this District tout their use of Trumpf equipment. For example, Texcraft Custom Metal Fabrication, located at 9102 Highway 87 FRD, Lubbock, TX 79423, states on its website: “Texcraft’s experienced Trumpf TruLaser Fiber 2030 and Trumpf TruMatic L4030 Cutting Service is your quality partner for precision laser cutting.”³ Similarly, All Metals Fabricating, located at 200 Allentown Pkwy, Allen, TX 75002, states on its website: “At All Metals Fabricating, our expert laser cutting department is equipped with state-of-the-art Trumpf and Bystronic CNC laser cutting systems, which offer high precision profiles across a variety of materials including steel, stainless steel, and aluminum.”⁴ As another example, Republic Manufacturing, located at 5131 Cash Road, Dallas, TX 75247, describes its investments in Trumpf lasers and bending machines,⁵ and published a video on its YouTube channel titled “Precise Laser Cutting of Metal using Trumpf TruLaser 3030 with Liftmaster” inviting potential customers: “If you’re looking to start laser metal cutting with our Trumpf

³ <https://texcraft.biz/laser-cutting/>, last accessed January 12, 2026; last archived on June 20, 2024 at <https://web.archive.org/web/20240620022552/https://texcraft.biz/laser-cutting/>.

⁴ <https://www.ametals.com/post/amf-debuts-worlds-fastest-fiber-laser-at-mfg-day>, last accessed January 12, 2026; last archived on September 15, 2025 at <https://web.archive.org/web/20250915032253/https://www.ametals.com/post/amf-debuts-worlds-fastest-fiber-laser-at-mfg-day>.

⁵ <https://www.republic-mfg.com/60-years>, last accessed January 12, 2026; last archived on January 9, 2026 at <https://web.archive.org/web/20260109230158/https://www.republic-mfg.com/60-years>.

TruLaser 3000, contact our experts at 214-631-8070 or visit us at republic-mfg.com.”⁶

Laserweld at 1350 Schlipf Road, Katy, TX 77493 lists on its website no fewer than twelve different Trumpf laser welding, laser cutting, punching, and bending machines in use in its facility.⁷

12. On information and belief, Trumpf makes purposeful, substantial, and sustained contacts within Texas marketing, selling, and servicing equipment for these and other customers.

13. Additionally, Trumpf is currently advertising job openings for Field Service Technicians in cities including Austin, TX.⁸

14. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(c)(3) because each Defendant is a foreign corporation and may be sued in any judicial district.

THE ASSERTED PATENT

15. On May 31, 2016, the ’415 patent, entitled “High Power Fiber Laser Safety Control System,” was duly and legally issued by the United States Patent and Trademark Office. The ’415 patent names Valentin Volodyn and Sergey Guskov as inventors.

16. Messrs. Volodyn and Guskov assigned their rights as inventors to the ’415 Patent to IPG Photonics. Plaintiff is currently the owner of the entire right, title, and interest of the ’415 Patent.

⁶ <https://www.youtube.com/watch?v=9h13KloaH44>, last accessed January 12, 2026; last archived on April 9, 2023 at <https://web.archive.org/web/20230409231206/https://www.youtube.com/watch?v=9h13KloaH44>.

⁷ <https://laserweldinc.com/equipment-list/>, last accessed January 12, 2026; last archived on November 7, 2025 at <https://web.archive.org/web/20251107192213/https://laserweldinc.com/equipment-list/#content>.

⁸ https://trumpf.wd3.myworkdayjobs.com/en-US/TRUMPF_Graduates_and_Professionals/job/Field-Service-Engineer_R00036974-1, linked from https://www.trumpf.com/en_INT/careers/vacancies/, last accessed January 12, 2026.

17. The '415 Patent discloses and claims a safety control system for high-power lasers used in applications such as welding, cutting, and marking. *See, e.g.*, Ex. A at Abstract:

A laser safety control system is configured with a power source module directly coupled to an AC source and including a galvanically isolated DC/DC converter with at least one output capacitor, and a safety mechanism. The safety mechanism has first and second safety channels which operate independently from one another so as to switch the normal operating regime of the power source module to the safe regime. In the normal operating regime, its DC output has a high voltage, whereas in the safe regime the DC output has a low voltage lower than the high voltage.

The safety channels each include a shutdown circuit operative to switch the DC/DC converter off and a discharging circuit operative to discharge the output capacitor. The switching off DC/DC converter and discharging of the output capacitor define the safe regime of the power source module.

18. The shutdown circuit in the '415 patent facilitated the elimination of electromechanical contactors, decreased the time required to bring a laser system back into a state of readiness, and improved electrical efficiency. By eliminating the need to periodically replace worn electromechanical contactors and the resultant downtime to production lines, the inventive shutdown circuit increases productivity and decreases costs.

19. Claim 4 of the '415 Patent is exemplary, reciting:

4. A laser safety control system, comprising:

a power source module coupled to an AC source and including

a galvanically isolated DC/DC converter, and

a safety mechanism which is configured with first and second safety channels operating independently from one another and each provided with:

a shutdown circuit for switching the power source module from a normal operating regime, in which a DC output of the power source has a high voltage, to a safe regime, in which the DC output has a low voltage lower than the high voltage, and

a discharging circuit operative to discharge an output capacitor coupled to an output of the DC/DC converter to the low voltage in the safe regime; wherein the discharging circuits of respective safety channels each operate subsequently to or simultaneously with the shutdown circuit; and

a laser module including a high power fiber laser system and a laser pump system which receives the DC output, wherein the low voltage is lower than an emission threshold of the laser pump system.

Ex. A at 7:47-8:20.

TRUMPF’S INFRINGING PRODUCTS

20. Trumpf is a manufacturer and distributor of both standalone lasers as well as integrated systems containing lasers, such as markers, cutters, and welders.

21. Trumpf has been selling, offering for sale, and/or importing products into the United States that infringe the ’415 Patent.

22. On information and belief, Trumpf has had actual knowledge of the ’415 Patent since at least on or about November 18, 2022, when the International Search Report for Trumpf’s international patent application PCT/EP2022/073800 was mailed, listing the ’415 Patent’s initial publication, US2015/255943A1 (“the ’943 Publication”), as an “X” (anticipatory) reference for all claims. Likewise, the claims of Trumpf’s subsequent national-stage applications in Germany, Canada, Japan, the EPO, and the USA have been rejected over the ’943 Publication. On information and belief, Trumpf would not pursue such a significant worldwide patent campaign were it not practicing that which it was attempting to patent—and that which it has repeatedly been informed is already covered by the ’415 Patent. Despite this ongoing knowledge of the ’415 Patent, Trumpf has willfully continued with its infringing activities.

23. At all relevant times since November 18, 2022, Trumpf had actual knowledge of the ’415 Patent; it had knowledge that it uses, sells, offers for sale, and/or imports products that

infringe the '415 Patent; and it encouraged others to infringe the '415 Patent through its activities.

24. Trumpf's actions, alone and in conjunction with others, constitute both willful infringement of the '415 Patent and exceptional circumstances pursuant to 35 U.S.C. §§ 284 and 285.

COUNT 1
Infringement of the '415 Patent

25. Plaintiff restates and realleges the preceding paragraphs of this Complaint.

26. In violation of 35 U.S.C. § 271, Trumpf has infringed and/or induced others to infringe of one or more claims of the '415 patent, including but not limited to claim 4, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '415 patent. These products include at least the TruFiber and TruDiode lines of laser equipment, as well as any other laser products that include a voltage-reducing safety circuit.

27. Trumpf's laser systems include a laser safety control system that disables the output of the laser in response to a trigger condition such as the tripping of an interlock switch.

28. The laser safety control system includes a power source module coupled to an AC source. For example, Trumpf's laser systems include a Diode Power Supply (DPS) module configured to be coupled to a 480-volt, three-phase AC source.

29. The power source module includes a galvanically isolated DC/DC converter. For example, a DPS in Trumpf's laser systems includes a DC/DC converter for each laser channel. On information and belief, the DC/DC converter is galvanically isolated, as such galvanic isolation is typical in industrial equipment requiring a high degree of safety.

30. The power source module further includes a safety mechanism which is configured with first and second safety channels operating independently from one another. For example, Trumpf's laser systems include an ASV module that is configured with two safety channels. On information and belief, the first and second safety channels operate independently from one another, as such redundant functionality is required by global safety standards for laser equipment.

31. The first and second safety channels are each provided with a shutdown circuit for switching the power source module from a normal operating regime, in which a DC output of the power source has a high voltage, to a safe regime, in which the DC output has a low voltage lower than the high voltage. For example, on information and belief, the ASV module in a Trumpf laser system signals the DPS to reduce its output voltage when one of the safety channels indicates a fault condition.

32. The first and second safety channels are each further provided with a discharging circuit operative to discharge an output capacitor coupled to an output of the DC/DC converter to the low voltage in the safe regime; wherein the discharging circuits of respective safety channels each operate subsequently to or simultaneously with the shutdown circuit. For example, on information and belief, the DPS in a Trumpf laser system contain circuitry that, in response to a fault signal and subsequently to or simultaneously with the shutdown circuit, discharges the capacitors at the output to the laser module to a level that is too low to operate the laser pump diodes.

33. The laser safety control system further includes a laser module including a high power fiber laser system and a laser pump system which receives the DC output, wherein the low voltage is lower than an emission threshold of the laser pump system. For example, a Trumpf

laser system includes at least one high power (e.g., 1500-6000 watt) fiber laser module which receives the DC output from the DPS. As stated above, on information and belief the safety circuitry in a Trumpf laser system discharges the capacitors at the output to the laser module to a level that is too low to operate the laser pump diodes.

34. In view of the foregoing, Trumpf has infringed and continues to infringe the '415 patent in violation of 35 U.S.C. § 271.

35. Trumpf has had knowledge of the '415 patent and that its activities infringe the '415 patent long before the filing of this action, at a minimum by the repeated rejection over the '943 Publication of Trumpf's own attempts to patent its functionality.

36. Trumpf takes active steps to knowingly induce infringement of the '415 patent by directing, encouraging, promoting, and instructing others to make, use, offer for sale, sell, and/or import the infringing products in the United States.

37. Plaintiff is entitled to the relief provided by 35 U.S.C. § 284, including, *inter alia*, damages adequate to compensate Plaintiff for the infringement, but not less than a reasonable royalty and/or lost profits for the use made of the invention of the '415 patent by Trumpf, together with interest and costs.

38. Despite having actual notice of the '415 patent, Trumpf continued to actively infringe the '415 patent in disregard of Plaintiff's rights, making this case exceptional and entitling Plaintiff to reasonable attorney's fees pursuant to 35 U.S.C. § 285.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Enter judgment that Trumpf has infringed one or more claims of the '415 patent;
2. Award Plaintiff damages in an amount sufficient to compensate it for Trumpf's infringement of one or more claims of the '415 patent, together with pre-judgment and post-judgment interest costs, and all other damages permitted under 35 U.S.C. § 284;
3. Declare that this be an exceptional case within the meaning of 35 U.S.C. § 285;
4. Award Plaintiff its costs in this action, together with reasonable attorneys' fees and pre-judgment and post-judgment interest;
5. Perform an accounting of Trumpf's infringing activities through trial and judgment; and
6. Award Plaintiff such other and further relief, including other monetary and equitable relief, as this Court deems just and proper.

Dated: January 15, 2026

By: /s/ John V. Picone III

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