

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ROKFORM LLC, a Delaware company;
ROKFORM IP LLC, a California company,
Plaintiffs,
v.

SHENZHEN TORRAS TECHNOLOGY CO.,
LTD., a Chinese entity;

SHENZHEN LECHUANG TIANCHENG
TECHNOLOGY CO., LTD., a Chinese entity;

SHENZHEN RUIXIN DIGITAL
TECHNOLOGY CO., LTD., a Chinese entity;

SHANGHAI KUKE NETWORK
TECHNOLOGY CO., LTD., a Chinese entity,

Defendants.

CIVIL ACTION NO. 2:26-CV-000520-JRG
(Lead Case)

CIVIL ACTION NO. 2:26-CV-00050-JRG
(Member Case)

JURY TRIAL DEMANDED

**CONSOLIDATED AMENDED COMPLAINT FOR PATENT INFRINGEMENT
AND JURY DEMAND**

Plaintiffs Rokform LLC and Rokform IP LLC (collectively, “Rokform”) hereby complain of Defendants Shenzhen Torras Technology Co., Ltd., and Shenzhen Lechuang Tiancheng Technology Co., Ltd. (collectively referred to in this complaint as the “TORRAS Defendants”) and Defendants Shenzhen Ruixin Digital Technology Co., Ltd. d/b/a CASEKOO and Shanghai Kuke Network Technology Co., Ltd. d/b/a CASEKOO US (collectively referred to in this complaint as the “CASEKOO Defendants”) and allege as follows:

PARTIES

1. Rokform LLC is a Delaware company with a principal place of business at 16180 Scientific Way, Irvine, CA 92618.

2. Rokform IP LLC is a California company with a principal place of business at 16180 Scientific Way, Irvine, CA 92618.

3. Rokform IP LLC is the owner of U.S. Patent No. 11,775,019 and U.S. Patent No. 12,656,835 (the “Asserted Patents”). Rokform LLC holds lawful licensing rights under the Asserted Patents, including the right to practice the inventions claimed in the Asserted Patents within at least the United States and the right to sue for infringement and collect damages, including past damages. Plaintiffs join together in this action to assert their respective interests under the Asserted Patents against the Defendants.

4. On information and belief, Shenzhen Torras Technology Co., Ltd., is a Chinese company with a principal place of business at RM 1215 BLK C, Zhantao Technology BLDG, Minzhi Avenue, Minzhi ST, Longhua DIST, Shenzhen CN. On information and belief, Shenzhen Lechuang Tiancheng Technology Co., Ltd. is a Chinese company with a principal place of business 龙华区民治街道新牛社区民治大道与工业东路交汇处展滔科技大厦C座C1403深圳市广东 518000, CN. On information and belief, the translation for this address is Intersection

of Minzhi Avenue and Gongye East Road, Xinniu Community, Minzhi Subdistrict, Longhua District Room C1403, Building C, Zhantao Technology Building, Shenzhen Guangdong 518000 CN.

5. On information and belief, Shenzhen Ruixin Digital Technology Co., Ltd. is a Chinese entity with a principal place of business at RM 1807, BLK C, Zhantao Technology BLDG, Minzhi Avenue, Minzhi ST, Longhua DIST, Shenzhen, China. On information and belief, Shanghai Kuke Network Technology Co., Ltd. is a Chinese entity with a principal place of business at 虹口区广灵四路855弄1号703, 上海市, 虹口区, 上海市, 200083, CN. On information and belief, the translation for this address is Room 703, No. 1, Lane 855, Guangling 4th Road, Hongkou District, Shanghai, 200083, CN.

JURISDICTION AND VENUE

6. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §§ 1 et seq. The Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. The TORRAS Defendants are subject to personal jurisdiction in the State of Texas and this District because they are doing, and, on information and belief, have done, substantial business in this District, including business relating to the sale and distribution of the Accused Products, as defined below. On information and belief, the TORRAS Defendants have continuous and systematic business contacts with the State of Texas and directly, or through intermediaries such as distributors, conduct business in Texas by shipping, distributing, offering for sale, selling, and advertising (including the provision of an interactive web page, *see, e.g.*, <https://torraslife.com>) the Accused Products in the State of Texas and this District. The interactive web page can be accessed in the State of Texas and this District, and it expressly offers products

for sale to customers in the United States and expressly offers free shipping to customers in the United States. The TORRAS Defendants, directly, or through intermediaries such as distributors, have also purposefully and voluntarily placed the Accused Products into the stream of commerce with the intention and expectation that they will be purchased and used by consumers in this District. Therefore, the exercise of jurisdiction over the TORRAS Defendants is appropriate under the applicable jurisdictional statutes consistent with traditional notions of fair play and substantial justice.

8. The CASEKOO Defendants are subject to personal jurisdiction in the State of Texas and this District because they are doing, and, on information and belief, have done, substantial business in this District, including business relating to the sale and distribution of the Accused Products, as defined below. On information and belief, the CASEKOO Defendants have continuous and systematic business contacts with the State of Texas and directly, or through intermediaries such as distributors, conduct business in Texas by shipping, distributing, offering for sale, selling, and advertising (including the provision of an interactive web page, see, e.g., <https://casekoo.com>) the Accused Products in the State of Texas and this District. The interactive web page can be accessed in the State of Texas and this District, and it expressly offers products for sale to customers in the United States and expressly offers free shipping to customers in the United States. The CASEKOO Defendants, directly, or through intermediaries such as distributors, have also purposefully and voluntarily placed the Accused Products into the stream of commerce with the intention and expectation that they will be purchased and used by consumers in this District. Therefore, the exercise of jurisdiction over the CASEKOO Defendants is appropriate under the applicable jurisdictional statutes consistent with traditional notions of fair play and substantial justice.

9. Venue is proper in this District pursuant to 28 U.S.C. § 1391(c)(3) because the TORRAS Defendants and the CASEKOO Defendants are foreign entities and are not resident in the United States.

ALLEGATIONS COMMON ALL CLAIMS FOR RELIEF

History of Rokform

10. Rokform LLC is a pioneer in the design, development, and distribution of innovative and high-quality handheld electronic device accessories, including phone cases. Rokform LLC offers a range of products to protect handheld electronic devices and allow hands-free use of such devices at home, in the car, on a bicycle, on a motorcycle, and in other settings. Rokform LLC was founded in 2010 and has since established itself as one of the leading brands in the handheld electronic device accessory market.

11. Rokform LLC's products, including its renowned rugged magnetic phone cases, and its high-quality magnetic mounting technology, are meticulously engineered to provide superior protection, versatility, and convenience.

12. Rokform LLC has been praised for its groundbreaking advancements in handheld electronic device technology. For example, Rokform LLC has received awards for its technology, including from the Consumer Electronics Show ("CES"). As another example, Rokform LLC's products have been featured as a top phone case by well-known media outlets, such as CNET, Tom's Guide, GearLab, Android Authority, digitaltrends.com, Digital Camera World, Apple Insider, Android Central, Best Products, Bicycling.com, Road and Track, and SlashGear. These innovations have solidified Rokform LLC's reputation as an industry leader. Rokform LLC's products have also been featured in numerous media outlets, including Car and Driver, Buzzfeed, Android Police, Gear Junkie, Golf.com, Adventure Rider, and Esquire.

13. Rokform IP LLC is the assignee of U.S. Patent No. 11,775,019 (the “’019 Patent”), entitled “CASE AND MOUNT SYSTEM FOR HANDHELD ELECTRONIC DEVICE,” which issued on October 3, 2023 naming as inventors Jeff Whitten, Bernhard Leitner, and Craig Erion. Rokform IP LLC is also the assignee of and U.S. Patent No. 12,656,835 (the “’835 Patent”) entitled “CASE AND MOUNT SYSTEM FOR HANDHELD ELECTRONIC DEVICE,” which issued on June 16, 2026 naming as inventors Jeff Whitten, Bernhard Leitner, and Craig Erion.

14. Rokform has satisfied the requirements of 35 U.S.C. § 287(a) with respect to the ’019 Patent and ’835 Patent and Rokform is entitled to damages for the TORRAS Defendants’ past infringement.

Infringement by TORRAS

15. The TORRAS Defendants offer for sale and sell in the United States, for example, on its website and online marketplaces, such as Amazon.com, products that infringe the ’019 Patent and ’835 Patent. The website and online marketplaces are accessible in the United States, including from this District. On information and belief, Shenzhen Torras Technology Co., Ltd. manufactures the Accused Products in China and imports them into the United States. For example, Shenzhen Torras Technology Co., Ltd. appears on the box for the Accused Products. The Accused Products include the TORRAS Ostand Q1 Product Line, TORRAS Ostand O3 Case Product Line, TORRAS Ostand Q3 Product Line (i.e., <https://torraslife.com/collections/iphone-case?page=1>; <https://torraslife.com/collections/samsung-s-series>; <https://torraslife.com/collections/pixel-series-case>; <https://torraslife.com/products/ostand-o3-hue-for-iphone-17-pro-max>; <https://torraslife.com/products/ostand-q3-silicone-for-iphone-17-pro>). On information and belief, Shenzhen Lechuang Tiancheng Technology Co., Ltd. sells the Accused Products on Amazon.com under the name “Shenzhenshi lechuangtiancheng kejiyouxiangongsi,”

which appears as the seller for the Accused Products sold in the Amazon TORRAS Store. https://www.amazon.com/sp?ie=UTF8&seller=AD54EWO4N8L4&asin=B0FGCHMXT6&ref_=dp_merchant_link&isAmazonFulfilled=1. The listings for the Accused Products state that the products are sold by TORRAS®. https://www.amazon.com/TORRAS-iPhone-Compatible-Protection-Translucent/dp/B0FGCP63XL/ref=sr_1_1_sspa?crid=2EIJEPTCC08FE&dib=eyJ2IjoiMSJ9.idTRHEU8VOO4_G62ETXYvDjuBBVku0786PCamR86SaO_yV0ToFIHo7ZwN5My6MgDZ-ViaCwNlKiLkf-vHKAnC-ais_KVXd9vOFPrUlvj67Z29fcIM7uLXRe24hheda2QV0ha2mscepTCrvzpTTOYTvGwXZ26JliJ76UIKhGFbsAc17vNgTZwlWPewxjHAszaHXzLWsnlQYIDF_O3Wgo1Y1US9E4wcVysW_xeLk71W-U.rpaP2vhgflbybtpvwyrEmQ7V1xb5gqw-qmjGU9Ngmhw&dib_tag=se&keywords=torras&qid=1768948487&srefix=torr%2Caps%2C198&sr=8-1-spons&sp_csd=d2lkZ2V0TmFtZT1zcF9hdGY&th=1.

Shenzhenshi lechuangtiancheng kejiyouxiangongsi is the pinyin romanization of the Chinese characters for Shenzhen Lechuang Tiancheng Technology Co., Ltd. On information and belief, the TORRAS Defendants are affiliates of one another.

16. On information and belief, the TORRAS Defendants are also affiliates of Shenzhen Ruixin Digital Technology Co., Ltd. and Shanghai Kuke Network Technology Co., Ltd. For example, Shenzhen Torras Technology Co., Ltd. and Shenzhen Ruixin Digital Technology Co., Ltd. share a common principal place of business, given that Shenzhen Ruixin Digital Technology Co., Ltd. lists its address on its product packaging as RM 1807 BLK C, Zhantao Technology BLDG, Minzhi Avenue, Minzhi ST, Longhua DIST, Shenzhen CN. Shenzhen Ruixin Digital Technology Co., Ltd. and Shanghai Kuke Network Technology Co., Ltd. both use the Casekoo

mark in marketing its products. On information and belief, Shenzhen Lanhe Technologies Co., Ltd. is the parent entity to the TORRAS Defendants, Shenzhen Ruixin Digital Technology Co., Ltd. and Shanghai Kuke Network Technology Co., Ltd. On information and belief, Shenzhen Lanhe Technologies Co., Ltd. has represented to the public that Casekoo and Torras are its brands.

Infringement by CASEKOO

17. The CASEKOO Defendants offer for sale and sell in the United States, for example, on its website and online marketplaces, such as Amazon.com, products that infringe the '019 Patent and '835 Patent. The website and online marketplaces are accessible in the United States, including from this District. On information and belief, Shenzhen Ruixin Digital Technology Co., Ltd. manufactures the Accused Products in China and imports them into the United States. For example, Shenzhen Ruixin Digital Technology Co., Ltd. appears on the box for the Accused Products. The Accused Products include the CASEKOO Magic Stand Product Line and the CASEKOO Magic Stand Pro Product Line (i.e., <https://casekoo.com/collections/magic-stand-cases>; <https://casekoo.com/collections/x-line>; <https://casekoo.com/collections/samsung>). On information and belief, Shanghai Kuke Network Technology Co., Ltd. sells the Accused Products on Amazon.com under the name “SHANGHAI KU KE WANG LUO KE JI YOU XIAN GONG SI,” which appears as the seller for the Accused Products sold in the Amazon CASEKOO Store. https://www.amazon.com/sp?ie=UTF8&seller=A2WI2R6H3U1YSA&asin=B0DRXJ3K4T&ref_=dp_merchant_link&isAmazonFulfilled=1. The listings for the Accused Products state that the products are sold by CASEKOO US. https://www.amazon.com/CASEKOO-iPhone-17-Pro-Case/dp/B0FC6N3SHJ/ref=sr_1_1_sspa?crid=FRGEMDIP72U7&dib=eyJ2IjojMSJ9.drUK22X1S2QvR1KaSXa0injXRtB_40mjnyDIIfWkRu7IvZ_vjWwwBDJ7WdCjOGRlgL3G-E8SUt-UuU1Cwvv2okH35sAY2Ynu9VqBwISzoYASF3_TSJ2pTuQOvmULcMY7q8sGDMK3EFxFZ

x8HvJmw9gAfS67oG-my_Z0n7EDNf1KSLZObl4JOiH28bhRP1CIzU-4fTYyXaWAef6Y__UY6vlhtJIEu0f4W6wSZ4KkPo5d8.EQ8DLMXNRGsDGK34l1QVvCBXVmeEXSBAJWBZIF4K4Ng&dib_tag=se&keywords=casakoo&qid=1768948655&prefix=casako%2Caps%2C225&sr=8-1-spons&sp_csd=d2lkZ2V0TmFtZT1zcF9hdGY&th=1. SHANGHAI KU KE WANG LUO KE JI YOU XIAN GONG SI is the pinyin romanization of the Chinese characters for Shanghai Kuke Network Technology Co., Ltd. On information and belief, the CASEKOO Defendants are affiliates of one another.

18. On information and belief, the CASEKOO Defendants are also affiliates of Shenzhen Torras Technology Co., Ltd. and Shenzhen Lechuang Tiancheng Technology Co., Ltd. For example, Shenzhen Ruixin Digital Technology Co., Ltd. and Shenzhen Torras Technology Co., Ltd. share a common principal place of business, given that Shenzhen Torras Technology Co., Ltd. lists its address on its product packaging as RM 1215 BLK C, Zhantao Technology BLDG, Minzhi Avenue, Minzhi ST, Longhua DIST, Shenzhen CN. Shenzhen Torras Technology Co., Ltd. and Shenzhen Lechuang Tiancheng Technology Co., Ltd. both use the Torras mark in marketing its products. On information and belief, Shenzhen Lanhe Technologies Co., Ltd. is the parent entity to the CASEKOO Defendants, Shenzhen Torras Technology Co., Ltd. and Shenzhen Lechuang Tiancheng Technology Co., Ltd. On information and belief, Shenzhen Lanhe Technologies Co., Ltd. has represented to the public that Casekoo and Torras are its brands.

COUNT I

(Infringement of the '019 Patent)

19. Rokform incorporates by reference all previous allegations as though set forth fully herein.

Infringement by TORRAS

20. The TORRAS Defendants have infringed, and continue to infringe, one or more claims of the '019 Patent, including at least claim 9, under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, by importing, using, offering to sell, and selling each phone case in their TORRAS Ostand Q1 Product Line, TORRAS Ostand O3 Case, and TORRAS Ostand Q3 Product Line. The TORRAS Defendants sell each phone case in their TORRAS TORRAS Ostand Q1 Product Line, TORRAS Ostand O3 Case, and TORRAS Ostand Q3 Product Line on their website (i.e., <https://torraslife.com>) and through online marketplaces, such as Amazon.com.

21. The TORRAS Defendants, after receiving notice of this action and knowing that their products infringe the '019 Patent, including at least claim 9, and with the specific intent for others to infringe the '019 Patent, have knowingly continued to, and currently, actively induce infringement of one or more claims of the '019 Patent under 35 U.S.C. § 271(b) both literally and/or under the doctrine of equivalents by, among other things, actively inducing others, including their customers, to infringe the '019 Patent. On information and belief, with the knowledge of the '019 Patent provided after receiving notice of this action, the TORRAS Defendants accomplish such inducement by continuing to direct and/or instruct others to use and/or operate cases that infringe at least claim 9 of the '019 Patent, including their TORRAS Ostand Q1 Product Line, TORRAS Ostand O3 Case, and TORRAS Ostand Q3 Product Line. Rokform's allegations for induced infringement are limited to conduct occurring after the date of the filing of this action.

22. For example, each of the TORRAS Defendants' Ostand Q1 cases, such as the Ostand Q1 Guardian Case for the iPhone 17 Pro (illustrated below), is a case configured to be selectively connectable to the handheld electronic device and retain the electronic device within an interior space of the case in use, the case comprising a rear wall that is configured to be positioned along

a rear surface of the electronic device in use and a sidewall extending from the rear wall and being configured to be positioned adjacent at least a portion of a top, bottom, left and right sides of the electronic device in use, wherein the rear wall and the sidewall are a unitary structure. As further illustrated below, the TORRAS Defendants' Ostand Q1 Guardian Case for the iPhone 17 Pro includes an exterior-facing member configured to be removably received in the rear wall of the case, the exterior facing member having an indentation and at least one magnet received within the indentation, the indentation facing the rear wall of the case, wherein the rear wall of the case and the exterior facing member fully enclose the at least one magnet.



The TORRAS Defendants' Ostand Q1 cases include products with the following Amazon Standard Identification Numbers (ASINs):

B0FGCVH5C6; B0D6GD3BSW; B0D6GF2XH3; B0D6GCFBXL; B0D6GGZ61F;
B0B7WD11WM; B0BGMMKH2L.

23. As another example, each of the TORRAS Defendants' O3 cases, such as the Ostand O3 Fitness Case for the iPhone 17 Pro Max (illustrated below), is a case configured to be selectively connectable to the handheld electronic device and retain the electronic device within an interior space of the case in use, the case comprising a rear wall that is configured to be

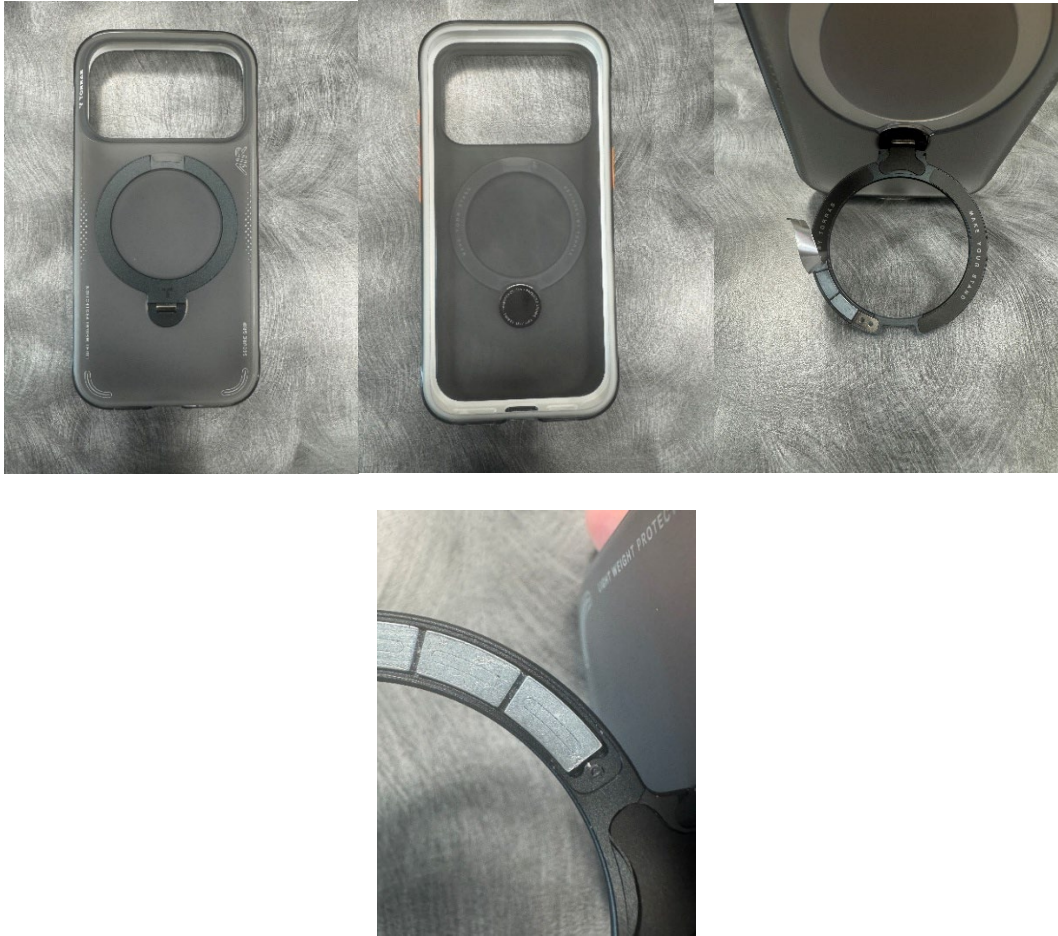
positioned along a rear surface of the electronic device in use and a sidewall extending from the rear wall and being configured to be positioned adjacent at least a portion of a top, bottom, left and right sides of the electronic device in use, wherein the rear wall and the sidewall are a unitary structure. As further illustrated below, the TORRAS Defendants' Ostand O3 Fitness Case for the iPhone 17 Pro Max includes an exterior-facing member configured to be removably received in the rear wall of the case, the exterior facing member having an indentation and at least one magnet received within the indentation, the indentation facing the rear wall of the case, wherein the rear wall of the case and the exterior facing member fully enclose the at least one magnet.



The TORRAS Defendants' Ostand O3 cases include products with the following ASINs:

B0FGCVRYPV; B0FGCP6GNR; B0FGCRX9ZR; B0G1TT1XM4; B0FGCJP5CF;
B0FGCY64HL; B0DX1SQ71V.

24. As another example, each of the TORRAS Defendants' Ostand Q3 cases, such as the Ostand Q3 Air Case for the iPhone 17 Pro (illustrated below), is a case configured to be selectively connectable to the handheld electronic device and retain the electronic device within an interior space of the case in use, the case comprising a rear wall that is configured to be positioned along a rear surface of the electronic device in use and a sidewall extending from the rear wall and being configured to be positioned adjacent at least a portion of a top, bottom, left and right sides of the electronic device in use, wherein the rear wall and the sidewall are a unitary structure. As further illustrated below, the TORRAS Defendants' Ostand Q3 Air Case for the iPhone 17 Pro includes an exterior-facing member configured to be removably received in the rear wall of the case, the exterior facing member having an indentation and at least one magnet received within the indentation, the indentation facing the rear wall of the case, wherein the rear wall of the case and the exterior facing member fully enclose the at least one magnet.



The TORRAS Defendants' Ostand Q3 cases include products with the following ASINs:

B0FCG57C66; B0FCG89WJY; B0G1M7Y8L4; B0FGCJLNDM; B0GC662D3X;
B0GC6WHHDC; B0FCG89WJY.

25. The TORRAS Defendants' infringing acts are without license or authorization from Rokform.

26. The TORRAS Defendants have had notice of its infringement of the '019 Patent since at least the filing of this action.

27. The TORRAS Defendants' acts of infringement of the '019 Patent recited herein have been committed, and are being committed, with full knowledge of Rokform's rights in the '019 Patent. On information and belief, the TORRAS Defendants have acted, and are continuing

to act, despite an objectively high likelihood that their actions constituted direct infringement of a valid patent, and knew, or should have known, of that objectively high risk since at least the filing of this Complaint and/or the date this Complaint was served upon the TORRAS Defendants. Pursuant to 35 U.S.C. § 284, Rokform is entitled to damages for the TORRAS Defendants' infringing acts. The TORRAS Defendants' acts further constitute willful and deliberate infringement, entitling Rokform to enhanced damages under 35 U.S.C. § 284 and reasonable attorneys' fees and costs under 35 U.S.C. § 285.

28. As a direct and proximate result of the TORRAS Defendants' infringement of the '019 Patent, Rokform has suffered irreparable injury for which it has no adequate remedy at law. Unless the TORRAS Defendants are permanently enjoined from further infringement of the '019 Patent, Rokform will continue to suffer irreparable injury and impairment of the value of its patent rights.

Infringement by CASEKOO

29. The CASEKOO Defendants have infringed, and continue to infringe, one or more claims of the '019 Patent, including at least claim 9, under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, by importing, using, offering to sell, and selling each phone case in their CASEKOO Magic Stand Product Line and Magic Stand Pro Product Line. The CASEKOO Defendants sell each phone case in their CASEKOO Magic Stand Product Line and Magic Stand Pro Product Line on their website (i.e., <https://casekoo.com>) and through online marketplaces, such as Amazon.com.

30. The CASEKOO Defendants, after receiving notice of this action and knowing that their products infringe the '019 Patent, including at least claim 9, and with the specific intent for others to infringe the '019 Patent, have knowingly continued to, and currently, actively induce

infringement of one or more claims of the '019 Patent under 35 U.S.C. § 271(b) both literally and/or under the doctrine of equivalents by, among other things, actively inducing others, including their customers, to infringe the '019 Patent. On information and belief, with the knowledge of the '019 Patent provided after receiving notice of this action, the CASEKOO Defendants accomplish such inducement by continuing to direct and/or instruct others to use and/or operate cases that infringe at least claim 9 of the '019 Patent, including their CASEKOO Magic Stand Product Line and Magic Stand Pro Product Line. Rokform's allegations for induced infringement are limited to conduct occurring after the date of the filing of this action.

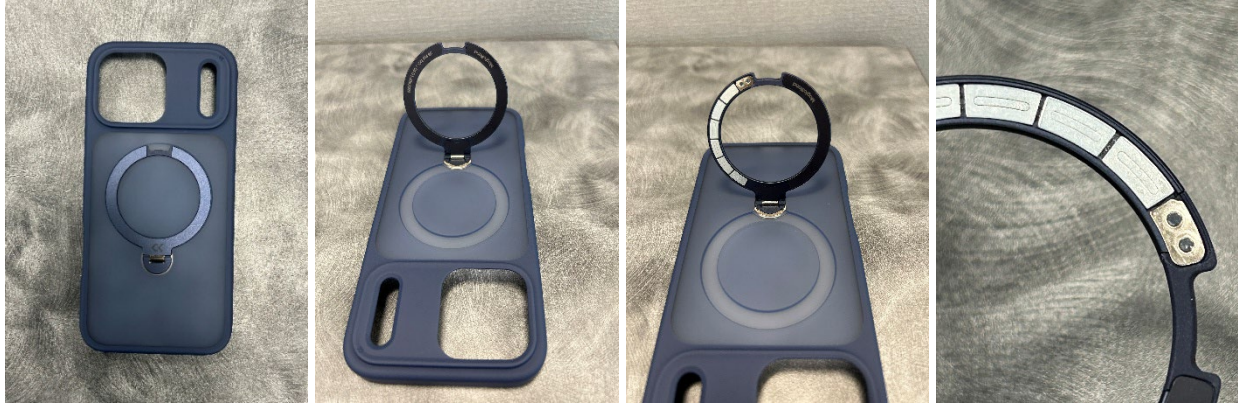
31. For example, each of the CASEKOO Defendants' Magic Stand cases, such as the Matte Magic Stand iPhone 15 Pro case (illustrated below), is a case configured to be selectively connectable to the handheld electronic device and retain the electronic device within an interior space of the case in use, the case comprising a rear wall that is configured to be positioned along a rear surface of the electronic device in use and a sidewall extending from the rear wall and being configured to be positioned adjacent at least a portion of a top, bottom, left and right sides of the electronic device in use, wherein the rear wall and the sidewall are a unitary structure. As further illustrated below, the CASEKOO Defendants' Matte Magic Stand iPhone 15 Pro case includes an exterior-facing member configured to be removably received in the rear wall of the case, the exterior facing member having an indentation and at least one magnet received within the indentation, the indentation facing the rear wall of the case, wherein the rear wall of the case and the exterior facing member fully enclose the at least one magnet.



The CASEKOO Defendants' Magic Stand cases include products with the following Amazon Standard Identification Numbers (ASINs):

B0FC6TJ6TR; B0D5YGTS2L; B0D5YK3PJ6; B0C9SPZJ4S; B0FC6TNXLD; B0FC6V7C8D; B0D5YL16JZ; B0FC6VY3XJ; B0FC6TQCZB; B0D5YJXNV3.

32. As another example, each of the CASEKOO Defendants' Magic Stand Pro cases, such as the Matte Magic Stand Pro iPhone 17 Pro case (illustrated below), is a case configured to be selectively connectable to the handheld electronic device and retain the electronic device within an interior space of the case in use, the case comprising a rear wall that is configured to be positioned along a rear surface of the electronic device in use and a sidewall extending from the rear wall and being configured to be positioned adjacent at least a portion of a top, bottom, left and right sides of the electronic device in use, wherein the rear wall and the sidewall are a unitary structure. As further illustrated below, the CASEKOO Defendants' Matte Magic Stand Pro iPhone 17 Pro case includes an exterior-facing member configured to be removably received in the rear wall of the case, the exterior facing member having an indentation and at least one magnet received within the indentation, the indentation facing the rear wall of the case, wherein the rear wall of the case and the exterior facing member fully enclose the at least one magnet.



The CASEKOO Defendants' Magic Stand Pro cases include products with the following ASINs: B0FBX78GKW; B0D5QRGD5V; B0FWBTCBJM; B0DRXJ3K4T; B0FBX92D98; B0FC6N3SHJ; B0FBX57YS9; B0D5QT4JV5; B0FBX7NH6V; B0D5QVV12L.

33. The CASEKOO Defendants' infringing acts are without license or authorization from Rokform.

34. The CASEKOO Defendants have had notice of its infringement of the '019 Patent since at least the filing of this action.

35. The CASEKOO Defendants' acts of infringement of the '019 Patent recited herein have been committed, and are being committed, with full knowledge of Rokform's rights in the '019 Patent. On information and belief, the CASEKOO Defendants have acted, and are continuing to act, despite an objectively high likelihood that their actions constituted direct infringement of a valid patent, and knew, or should have known, of that objectively high risk since at least the filing of this Complaint and/or the date this Complaint was served upon the CASEKOO Defendants. Pursuant to 35 U.S.C. § 284, Rokform is entitled to damages for the CASEKOO Defendants' infringing acts. The CASEKOO Defendants' acts further constitute willful and deliberate infringement, entitling Rokform to enhanced damages under 35 U.S.C. § 284 and reasonable attorneys' fees and costs under 35 U.S.C. § 285.

As a direct and proximate result of the CASEKOO Defendants' infringement of the '019 Patent, Rokform has suffered irreparable injury for which it has no adequate remedy at law. Unless the CASEKOO Defendants are permanently enjoined from further infringement of the '019 Patent, Rokform will continue to suffer irreparable injury and impairment of the value of its patent rights.

COUNT II

(Infringement of the '835 Patent)

36. Rokform incorporates by reference all previous allegations as though set forth fully herein.

Infringement by TORRAS

37. The TORRAS Defendants have infringed, and continue to infringe, one or more claims of the '835 Patent, including at least claim 7, under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, by importing, using, offering to sell, and selling each phone case in their TORRAS Ostand Q1 Product Line, TORRAS Ostand O3 Case, and TORRAS Ostand Q3 Product Line. The TORRAS Defendants sell each phone case in their TORRAS TORRAS Ostand Q1 Product Line, TORRAS Ostand O3 Case, and TORRAS Ostand Q3 Product Line on their website (i.e., <https://torraslife.com>) and through online marketplaces, such as Amazon.com.

38. The TORRAS Defendants, after receiving notice of this action and knowing that their products infringe the '835 Patent, including at least claim 7, and with the specific intent for others to infringe the '835 Patent, have knowingly continued to, and currently, actively induce infringement of one or more claims of the '835 Patent under 35 U.S.C. § 271(b) both literally and/or under the doctrine of equivalents by, among other things, actively inducing others, including their customers, to infringe the '835 Patent. On information and belief, with the knowledge of the '835 Patent provided after receiving notice of this action, the TORRAS

Defendants accomplish such inducement by continuing to direct and/or instruct others to use and/or operate cases that infringe at least claim 7 of the '835 Patent, including their TORRAS Ostand Q1 Product Line, TORRAS Ostand O3 Case, and TORRAS Ostand Q3 Product Line. Rokform's allegations for induced infringement are limited to conduct occurring after the date of the filing of this action.

39. For example, each of the TORRAS Defendants' Ostand Q1 cases, such as the Ostand Q1 Guardian Case for the iPhone 17 Pro (illustrated below) has a body portion configured to retain the handheld electronic device within an interior space of the body portion, the body portion comprising a rear wall; a perimeter wall; wherein the rear wall is configured to be aligned with at least a portion of a rear surface of the handheld electronic device, wherein the perimeter wall extends from a perimeter of the rear wall and is positioned proximate to at least portions of side surfaces of the handheld electronic device, and wherein the rear wall comprises an interior surface configured to face towards the rear surface of the handheld electronic device.



40. Each of the TORRAS Defendants' Ostand Q1 cases, such as the Ostand Q1 Guardian Case for the iPhone 17 Pro (illustrated below) also has an exterior-facing component having at least a portion thereof removably received in a receiving space defined by the rear wall

of the body portion, the exterior-facing component having a cavity; wherein the receiving space is defined at least in part by a recessed surface of the rear wall, and wherein the recessed surface faces away from the interior space of the body portion; at least one magnet retained within the cavity, the at least one magnet having a first face and a second face, wherein, with the exterior-facing component received in the receiving space, the first face of the at least one magnet faces the interior space of the body portion, wherein the second face of the at least one magnet faces the exterior-facing component, wherein the at least one magnet defines an outer periphery that extends in a thickness direction of the at least one magnet between the first face and the second face; wherein the cavity of the exterior-facing component is formed at least in part by a curved outer wall, and wherein the outer periphery of the at least one magnet is adjacent to at least a portion of the curved outer wall; wherein with the exterior-facing component received in the receiving space, the cavity faces the interior space of the body portion, wherein the exterior-facing component extends along the second face of the at least one magnet; wherein the at least one magnet is configured to attach the mountable case to a magnetic structure.



The TORRAS Defendants' Ostand Q1 cases include products with the following Amazon Standard Identification Numbers (ASINs):

B0FGCVH5C6; B0D6GD3BSW; B0D6GF2XH3; B0D6GCFBXL; B0D6GGZ61F;
B0B7WD11WM; B0BGMMKH2L

41. As another example, each of the TORRAS Defendants' Ostand O3 cases, such as the Ostand O3 Fitness Case for the iPhone 17 Pro Max (illustrated below) has a body portion configured to retain the handheld electronic device within an interior space of the body portion, the body portion comprising a rear wall; a perimeter wall; wherein the rear wall is configured to be aligned with at least a portion of a rear surface of the handheld electronic device, wherein the perimeter wall extends from a perimeter of the rear wall and is positioned proximate to at least portions of side surfaces of the handheld electronic device, and wherein the rear wall comprises an interior surface configured to face towards the rear surface of the handheld electronic device.



42. Each of the TORRAS Defendants' Ostand O3 cases, such as the Ostand O3 Fitness Case for the iPhone 17 Pro Max (illustrated below) also has an exterior-facing component having at least a portion thereof removably received in a receiving space defined by the rear wall of the

body portion, the exterior-facing component having a cavity; wherein the receiving space is defined at least in part by a recessed surface of the rear wall, and wherein the recessed surface faces away from the interior space of the body portion; at least one magnet retained within the cavity, the at least one magnet having a first face and a second face, wherein, with the exterior-facing component received in the receiving space, the first face of the at least one magnet faces the interior space of the body portion, wherein the second face of the at least one magnet faces the exterior-facing component, wherein the at least one magnet defines an outer periphery that extends in a thickness direction of the at least one magnet between the first face and the second face; wherein the cavity of the exterior-facing component is formed at least in part by a curved outer wall, and wherein the outer periphery of the at least one magnet is adjacent to at least a portion of the curved outer wall; wherein with the exterior-facing component received in the receiving space, the cavity faces the interior space of the body portion, wherein the exterior-facing component extends along the second face of the at least one magnet; wherein the at least one magnet is configured to attach the mountable case to a magnetic structure.



The TORRAS Defendants' Ostand O3 cases include products with the following ASINs:

B0FGCVRYPV; B0FGCP6GNR; B0FGCRX9ZR; B0G1TT1XM4; B0FGCJP5CF;
B0FGCY64HL; B0DX1SQ71V.

43. As another example, each of the TORRAS Defendants' Ostand Q3 cases, such as the Ostand Q3 Air Case for the iPhone 17 Pro (illustrated below) has a body portion configured to retain the handheld electronic device within an interior space of the body portion, the body portion comprising a rear wall; a perimeter wall; wherein the rear wall is configured to be aligned with at least a portion of a rear surface of the handheld electronic device, wherein the perimeter wall extends from a perimeter of the rear wall and is positioned proximate to at least portions of side surfaces of the handheld electronic device, and wherein the rear wall comprises an interior surface configured to face towards the rear surface of the handheld electronic device.



44. Each of the TORRAS Defendants' Ostand Q3 cases, such as the Ostand Q3 Air Case for the iPhone 17 Pro (illustrated below) also has an exterior-facing component having at least a portion thereof removably received in a receiving space defined by the rear wall of the body portion, the exterior-facing component having a cavity; wherein the receiving space is defined at least in part by a recessed surface of the rear wall, and wherein the recessed surface faces away from the interior space of the body portion; at least one magnet retained within the cavity, the at least one magnet having a first face and a second face, wherein, with the exterior-facing component received in the receiving space, the first face of the at least one magnet faces the interior space of the body portion, wherein the second face of the at least one magnet faces the exterior-facing component, wherein the at least one magnet defines an outer periphery that extends in a thickness direction of the at least one magnet between the first face and the second face; wherein the cavity of the exterior-facing component is formed at least in part by a curved outer wall, and wherein the outer periphery of the at least one magnet is adjacent to at least a portion of the curved outer wall; wherein with the exterior-facing component received in the receiving space,

the cavity faces the interior space of the body portion, wherein the exterior-facing component extends along the second face of the at least one magnet; wherein the at least one magnet is configured to attach the mountable case to a magnetic structure.



The TORRAS Defendants' Ostand Q3 cases include products with the following ASINs:

B0FCG57C66; B0FCG89WJY; B0G1M7Y8L4; B0FGCJLNDM; B0GC662D3X;
B0GC6WHHDC; B0FCG89WJY.

45. The TORRAS Defendants' infringing acts are without license or authorization from Rokform.

46. The TORRAS Defendants have had notice of its infringement of the '835 Patent since at least the filing of this action.

47. The TORRAS Defendants' acts of infringement of the '835 Patent recited herein have been committed, and are being committed, with full knowledge of Rokform's rights in the '835 Patent. On information and belief, the TORRAS Defendants have acted, and are continuing to act, despite an objectively high likelihood that their actions constituted direct infringement of a valid patent, and knew, or should have known, of that objectively high risk since at least the filing

of this Complaint and/or the date this Complaint was served upon the TORRAS Defendants. Pursuant to 35 U.S.C. § 284, Rokform is entitled to damages for the TORRAS Defendants' infringing acts. The TORRAS Defendants' acts further constitute willful and deliberate infringement, entitling Rokform to enhanced damages under 35 U.S.C. § 284 and reasonable attorneys' fees and costs under 35 U.S.C. § 285.

48. As a direct and proximate result of the TORRAS Defendants' infringement of the '835 Patent, Rokform has suffered irreparable injury for which it has no adequate remedy at law. Unless the TORRAS Defendants are permanently enjoined from further infringement of the '835 Patent, Rokform will continue to suffer irreparable injury and impairment of the value of its patent rights.

Infringement by CASEKOO

49. The CASEKOO Defendants have infringed, and continue to infringe, one or more claims of the '835 Patent, including at least claim 7, under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, by importing, using, offering to sell, and selling each phone case in their CASEKOO Magic Stand Product Line and Magic Stand Pro Product Line. The CASEKOO Defendants sell each phone case in their CASEKOO Magic Stand Product Line and Magic Stand Pro Product Line on their website (i.e., <https://casekoo.com>) and through online marketplaces, such as Amazon.com.

50. The CASEKOO Defendants, after receiving notice of this action and knowing that their products infringe the '835 Patent, including at least claim 7, and with the specific intent for others to infringe the '835 Patent, have knowingly continued to, and currently, actively induce infringement of one or more claims of the '835 Patent under 35 U.S.C. § 271(b) both literally and/or under the doctrine of equivalents by, among other things, actively inducing others,

including their customers, to infringe the '835 Patent. On information and belief, with the knowledge of the '835 Patent provided after receiving notice of this action, the CASEKOO Defendants accomplish such inducement by continuing to direct and/or instruct others to use and/or operate cases that infringe at least claim 7 of the '835 Patent, including their Magic Stand Product Line and Magic Stand Pro Product Line. Rokform's allegations for induced infringement are limited to conduct occurring after the date of the filing of this action.

51. For example, each of the CASEKOO Defendants' Magic Stand cases, such as the Matte Magic Stand iPhone 15 Pro case (illustrated below), has a body portion configured to retain the handheld electronic device within an interior space of the body portion, the body portion comprising a rear wall; a perimeter wall; wherein the rear wall is configured to be aligned with at least a portion of a rear surface of the handheld electronic device, wherein the perimeter wall extends from a perimeter of the rear wall and is positioned proximate to at least portions of side surfaces of the handheld electronic device, and wherein the rear wall comprises

an interior surface configured to face towards the rear surface of the handheld electronic device.



52. Each of the CASEKOO Defendants' Magic Stand cases, such as the Matte Magic Stand iPhone 15 Pro case (illustrated below) also has an exterior-facing component having at least a portion thereof removably received in a receiving space defined by the rear wall of the body portion, the exterior-facing component having a cavity; wherein the receiving space is defined at least in part by a recessed surface of the rear wall, and wherein the recessed surface faces away from the interior space of the body portion; at least one magnet retained within the cavity, the at least one magnet having a first face and a second face, wherein, with the exterior-facing component received in the receiving space, the first face of the at least one magnet faces the interior space of the body portion, wherein the second face of the at least one magnet faces the exterior-facing component, wherein the at least one magnet defines an outer periphery that extends in a thickness direction of the at least one magnet between the first face and the second face; wherein the cavity of the exterior-facing component is formed at least in part by a curved outer

wall, and wherein the outer periphery of the at least one magnet is adjacent to at least a portion of the curved outer wall; wherein with the exterior-facing component received in the receiving space, the cavity faces the interior space of the body portion, wherein the exterior-facing component extends along the second face of the at least one magnet; wherein the at least one magnet is configured to attach the mountable case to a magnetic structure



The CASEKOO Defendants' Magic Stand cases include products with the following Amazon Standard Identification Numbers (ASINs):

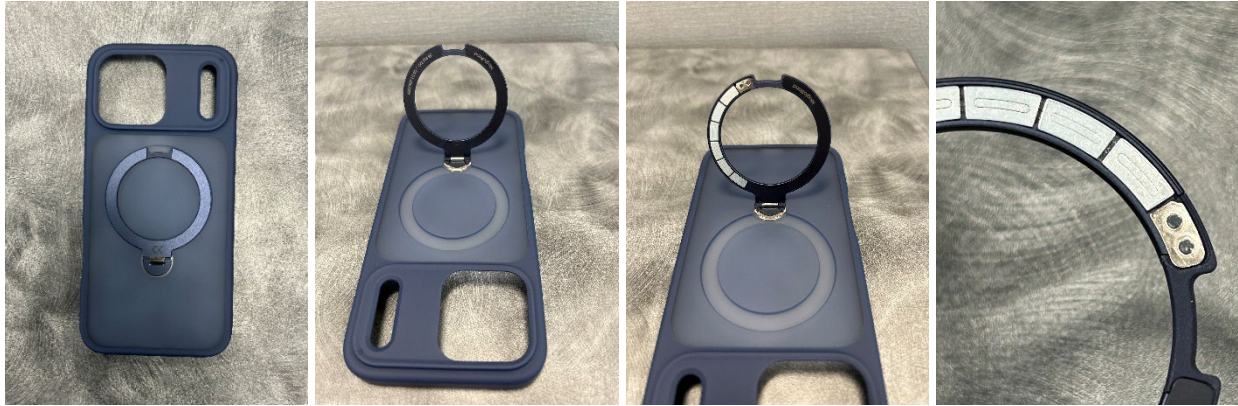
B0FC6TJ6TR; B0D5YGTS2L; B0D5YK3PJ6; B0C9SPZJ4S; B0FC6TNXLD; B0FC6V7C8D; B0D5YL16JZ; B0FC6VY3XJ; B0FC6TQCZB; B0D5YJXNV3.

53. As another example, each of the CASEKOO Defendants' Magic Stand Pro cases, such as the Matte Magic Stand Pro iPhone 17 Pro Max case (illustrated below), has a case configured to be selectively connectable to the handheld electronic device and retain the electronic device within an interior space of the case in use, the case comprising a rear wall that is configured to be positioned along a rear surface of the electronic device in use and a sidewall extending from the rear wall and being configured to be positioned adjacent at least a portion of a top, bottom, left and right sides of the electronic device in use, wherein the rear wall and the sidewall are a unitary structure.



54. Each of the CASEKOO Defendants' Magic Stand Pro cases, such as the Matte Magic Stand iPhone 17 Pro Max case (illustrated below) also has an exterior-facing component having at least a portion thereof removably received in a receiving space defined by the rear wall of the body portion, the exterior-facing component having a cavity; wherein the receiving space is defined at least in part by a recessed surface of the rear wall, and wherein the recessed surface faces away from the interior space of the body portion; at least one magnet retained within the cavity, the at least one magnet having a first face and a second face, wherein, with the exterior-facing component received in the receiving space, the first face of the at least one magnet faces the interior space of the body portion, wherein the second face of the at least one magnet faces the exterior-facing component, wherein the at least one magnet defines an outer periphery that extends in a thickness direction of the at least one magnet between the first face and the second face; wherein the cavity of the exterior-facing component is formed at least in part by a curved outer wall, and wherein the outer periphery of the at least one magnet is adjacent to at least a portion of the curved outer wall; wherein with the exterior-facing component received in the receiving space,

the cavity faces the interior space of the body portion, wherein the exterior-facing component extends along the second face of the at least one magnet; wherein the at least one magnet is configured to attach the mountable case to a magnetic structure.



The CASEKOO Defendants' Magic Stand Pro cases include products with the following ASINs: B0FBX78GKW; B0D5QRGD5V; B0FWBTCBJM; B0DRXJ3K4T; B0FBX92D98; B0FC6N3SHJ; B0FBX57YS9; B0D5QT4JV5; B0FBX7NH6V; B0D5QVV12L.

55. The CASEKOO Defendants' infringing acts are without license or authorization from Rokform.

56. The CASEKOO Defendants have had notice of its infringement of the '835 Patent since at least the filing of this action.

57. The CASEKOO Defendants' acts of infringement of the '835 Patent recited herein have been committed, and are being committed, with full knowledge of Rokform's rights in the '835 Patent. On information and belief, the CASEKOO Defendants have acted, and are continuing to act, despite an objectively high likelihood that their actions constituted direct infringement of a valid patent, and knew, or should have known, of that objectively high risk since at least the filing of this Complaint and/or the date this Complaint was served upon the CASEKOO Defendants. Pursuant to 35 U.S.C. § 284, Rokform is entitled to damages for the CASEKOO Defendants'

infringing acts. The CASEKOO Defendants' acts further constitute willful and deliberate infringement, entitling Rokform to enhanced damages under 35 U.S.C. § 284 and reasonable attorneys' fees and costs under 35 U.S.C. § 285.

58. As a direct and proximate result of the CASEKOO Defendants' infringement of the '835 Patent, Rokform has suffered irreparable injury for which it has no adequate remedy at law. Unless the CASEKOO Defendants are permanently enjoined from further infringement of the '835 Patent, Rokform will continue to suffer irreparable injury and impairment of the value of its patent rights.

PRAYER FOR RELIEF

WHEREFORE, Rokform respectfully requests that the Court enter judgment:

- A. That the TORRAS Defendants and CASEKOO Defendants have infringed, and continue to infringe, the Asserted Patents both literally and/or under the doctrine of equivalents;
- B. That the TORRAS Defendants and CASEKOO Defendants have induced, and continue to induce, infringement of the Asserted Patents since receiving notice of this action;
- C. That the TORRAS Defendants and CASEKOO Defendants have willfully infringed, and continue to willfully infringe, the Asserted Patents;
- D. That the Asserted Patents are valid and enforceable;
- E. That the TORRAS Defendants and CASEKOO Defendants, their officers, agents, and employees, and those persons in active concert of participation with any of them, and their successors and assigns be preliminary and permanently enjoined from infringement of the Asserted Patents, including but not limited to an injunction against making, using, offering to sell, and selling within the United States, and importing into the United States, products covered by the Asserted Patents;
- F. For an accounting for any infringing sales not presented at trial and an award by the Court of additional damages for any such infringing sales;
- G. That the TORRAS Defendants and CASEKOO Defendants be ordered to account for, and pay to, Rokform the damages resulting from their infringement of the Asserted Patents, including lost profits, together with interests and costs, and all other damages permitted by 35 U.S.C. 284, including enhanced damages up to three times the amount of damages found or measured, but in any event no less than a reasonable royalty;

- H. That this action be adjudged an exceptional case and Rokform be awarded its attorneys' fees, expenses, and costs in this action pursuant to 35 U.S.C. § 285; and
- I. That Rokform be awarded such other equitable or legal relief as this Court deems just and proper under the circumstances.

DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38, Rokform hereby demands a trial by jury as to all triable issues.

Dated:

FRIEDLAND CIANFRANI LLP

/s/ _____

David G. Kim (SBN 307,821)

david.kim@fciplaw.com

Joseph S. Cianfrani (SBN 196,186)

joe.cianfrani@fciplaw.com

Lauren Keller Katzenellenbogen (SBN 223,370)

lauren.katzenellenbogen@fciplaw.com

Michael K. Friedland (SBN 157,217)

michael.friedland@fciplaw.com

Nicole R. Townes (SBN 272,342)

nicole.townes@fciplaw.com

Steven N. Friedland (SBN 340,006)

steven.friedland@fciplaw.com

FRIEDLAND CIANFRANI LLP

17901 Von Karman Ave., Ste. 925

Irvine, CA 92614

949-734-4900

Attorneys for Plaintiffs

Rokform LLC and Rokform IP LLC

Jennifer P. Ainsworth (Bar Card Number: 00784720)

jainsworth@wilsonlawfirm.com

WILSON, ROBERTSON & VANDEVENTER, P.C. 909 ESE

Loop 323, Ste. 400

Tyler, Texas 75701

903-509-5000

Attorneys for Plaintiffs

Rokform LLC and Rokform IP LLC