

MASCHOFF BRENNAN GILMORE ISRAELSEN & MAURIEL LLP
Thomas P. Krzeminski (Cal. Bar No. 213714)
tkrzeminski@mabr.com
David J. Williams (Cal. Bar No. 236919)
dwilliams@mabr.com
100 Spectrum Center Drive, Suite 1200
Irvine, California 92618
Telephone: 949.202.1900
Facsimile: 949.453.1104

Attorneys for Plaintiff Germ Dome Industries LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GERM DOME INDUSTRIES LLC,

Plaintiff,

vs.

HYUNDAI MOTOR AMERICA,

Defendant.

Case No.: 8:25-cv-2593

COMPLAINT

DEMAND FOR JURY TRIAL

COMPLAINT

HYUNDAI MOTOR AMERICA

Ex. 1015

Page 1 of 6

1 Plaintiff Germ Dome Industries LLC (“Germ Dome”) brings this Complaint against
2 Defendant Hyundai Motor America (“Hyundai”). Germ Dome alleges as follows:

3 **PARTIES**

4 1. Plaintiff Germ Dome is a Michigan limited liability company with a principal place
5 of business at 4033 Beach Dr., Orchard Lake, MI 48324. Germ Dome is the owner of United States
6 patents relating to devices and methods for sanitizing an object or surface.

7 2. On information and belief, Hyundai is a corporation registered with the state of
8 California and with a regular and established place of business at 10550 Talbert Ave, Fountain
9 Valley, CA 92708. Hyundai manufactures vehicles with various features.

10 **JURISDICTION AND VENUE**

11 3. This Court has original subject matter jurisdiction over this action under 28 U.S.C.
12 §§ 1331 and 1338(a).

13 4. This Court has personal jurisdiction over Hyundai consistent with the principles
14 underlying the U.S. Constitution and at least California Code Civ. Pro. § 410.10. Hyundai is
15 registered and incorporated in the state of California and more particularly, in this district. Hyundai
16 is carrying on continuous and systematic business within the State of California.

17 5. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400 at least because
18 Hyundai has a regular and established place of business in this District and has committed acts of
19 infringement in this district.

20 **GERM DOME’S PATENT-IN-SUIT**

21 6. United States Patent No. 12,296,061 (“the ‘061 Patent”) issued on May 13, 2025
22 and is titled SYSTEM AND APPARATUS FOR SANITIZING A DOOR OPENING DEVICE
23 OR OTHER POINT OF CONTACT. A true and correct copy of the ‘061 Patent is attached to this
24 Complaint as Exhibit A.

25 7. The ‘061 Patent relates to a device for sanitizing an object. Generally, the device
26 includes a housing that at least partially defines an interior cavity. The housing has a first end wall,
27 a sidewall, and a second end wall opposite the first end wall. The second end wall at least partially
28

1 defines an opening into the interior cavity. At least one germicidal light source is inside the interior
2 cavity.

3 8. Germ Dome is the lawful owner of all rights, title, and interest in and to the '061
4 Patent, possesses all rights of recovery under the '061 Patent, and has standing to sue for
5 infringement of the '061 Patent. Rights in the '061 Patent were assigned to Germ Dome by virtue
6 of an assignment executed on August 19, 2019. A true and correct copy of said assignment is
7 attached to this Complaint as Exhibit B.

8 9. The '061 Patent is valid and enforceable.

9 **HYUNDAI'S INFRINGEMENT**

10 10. Hyundai offers a vehicle called the Hyundai Sante Fe, which includes a device for
11 sanitizing an object, shown below:¹



- 20 (1) UV-C sterilizer system button
21 (2) UV-C Indicator light
22 (3) UV-C sterilizable multi tray open
23 button

24 ///

25 ///

26
27 ¹ Picture taken from Hyundai's Owner's Manual, retrieved on August 5, 2025, available at
28 https://owners.hyundaiusa.com/content/dam/hyundai/us/myhyundai/manuals/glovebox-manual/2024/santa-fe/MX5a-2024-en_US-WEB-2C.pdf.

1 11. Hyundai makes, imports into the United States, offers for sale, sells, and/or uses in
2 the United States the Sante Fe, which infringes at least claims 1 and 11 of the '061 Patent.

3 12. Attached to this Complaint as Exhibit C is a claim chart showing how the Sante Fe
4 infringes claims of the '061 Patent.

5 13. In July 2025, Germ Dome notified Hyundai of its infringement of the '061 Patent
6 by letter, a copy of which is attached as Exhibit D. The letter was delivered to Hyundai on July 15,
7 2025. No response was received. Hyundai continues to make, use, sell, offer for sale, and/or import
8 the Santa Fe with sanitizing devices as of the date of filing this Complaint.

9 **COUNT I – PATENT INFRINGEMENT**

10 **'061 PATENT**

11 14. Germ Dome incorporates by reference the foregoing paragraphs of this Complaint
12 as if fully set forth herein.

13 15. Hyundai has been and is now infringing, literally and/or under the doctrine of
14 equivalents, the '061 Patent in this District and elsewhere by making, using, offering for sale,
15 importing, and/or selling the Sante Fe, which fall within the scope of at least one claim of the '061
16 Patent, without license or authorization, as shown in Exhibit C. These acts constitute infringement
17 under at least 35 U.S.C. § 271(a).

18 16. Germ Dome has suffered, is suffering, and will continue to suffer injury and
19 damages for which it is entitled to relief under 35 U.S.C. § 284 adequate to compensate it for
20 Hyundai's infringement.

21 17. Hyundai's infringement of the '061 Patent is and has been willful. Hyundai has
22 been on actual notice of the '061 Patent and its infringement of the '061 Patent as of at least July
23 15, 2025. Hyundai did not deny the infringement, or make any response at all. Yet, Hyundai
24 continues to make, use, sell, offer for sale, and/or import the Santa Fe with sanitizing device as of
25 the date of filing this Complaint. Therefore, Hyundai's actions constitute willful infringement of
26 the '061 Patent.

27 ///

28 ///

1 18. As a direct and proximate consequence of the infringement, Germ Dome has been
2 and is being harmed, and, unless Hyundai's infringing acts and practices are enjoined by the Court,
3 will continue to be injured in its property rights.

4 19. On information and belief, Hyundai's infringement will continue unabated unless
5 and until enjoined by this Court.

6 20. Germ Dome is entitled to injunctive relief from this Court under 35 U.S.C. § 283.

7 **PRAYER FOR RELIEF**

8 Germ Dome asks this Court to enter judgment against Hyundai and its officers, agents, servants,
9 employees, and all persons in active concert or participation with them, granting the following
10 relief:

11 A. An adjudication that Hyundai has infringed one or more claims of the '061 Patent;

12 B. An adjudication that Hyundai's infringement of the '061 Patent is and has been
13 willful;

14 C. The ascertainment of and award to Germ Dome of damages from the infringement
15 of one or more claims of the '061 Patent, including treble damages, together with prejudgment and
16 post-judgment interest and any other costs and expenses permitted by law, under 35 U.S.C. § 284;

17 D. A finding that this case is exceptional and the award of reasonable attorneys' fees,
18 costs, and expenses in this action to Germ Dome under 35 U.S.C. § 285;

19 E. Permanently enjoining Hyundai from any further acts of infringement of Germ
20 Dome's patent rights under 35 U.S.C. § 283; and

21 F. Awarding to Germ Dome such other and further relief as this Court may deem just
22 and proper.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38(b) and Civil L.R. 3-6(a), Germ Dome hereby demands a trial by jury on all issues and claims so triable.

Dated: November 18, 2025

MASCHOFF BRENNAN
GILMORE ISRAELSEN & MAURIEL LLP



Thomas P. Krzeminski
David J. Williams

Attorneys for Plaintiff
Germ Dome Industries LLC