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Attorneys for Plaintiff Germ Dome Industries LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

GERM DOME INDUSTRIES LLC

Plaintiff,

v.

GENESIS MOTOR AMERICA LLC

Defendant.

Case No.: 8:26-cv-00890

COMPLAINT

JURY TRIAL DEMANDED

Exhibit 2006
Germ Dome Industries LLC
PGR2026-00030
Hyundai Motor America Inc. v.
Germ Dome Industries LLC

COMPLAINT

Plaintiff Germ Dome Industries LLC ("Germ Dome") brings this Complaint against Defendant Genesis Motor America LLC ("Genesis"). Germ Dome alleges as follows:

PARTIES

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

2. On information and belief, Genesis is a limited liability company registered with the state of California and with a regular and established place of business at 10550 Talbert Ave, Fountain Valley, CA 92708. Genesis manufactures and sells vehicles with various features.

JURISDICTION AND VENUE

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

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

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

GERM DOME'S PATENT-IN-SUIT

6. United States Patent No. 12,296,061 ("the '061 Patent") issued on May 13, 2025 and is titled SYSTEM AND APPARATUS FOR SANITIZING A DOOR

OPENING DEVICE OR OTHER POINT OF CONTACT. A true and correct copy of the '061 Patent is attached to this Complaint as Exhibit A.

7. The '061 Patent relates to a device for sanitizing an object. Generally, the device includes a housing that at least partially defines an interior cavity. The housing has a first end wall, a sidewall, and a second end wall opposite the first end wall. The second end wall at least partially defines an opening into the interior cavity. At least one germicidal light source is inside the interior cavity.

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

9. The '061 Patent is valid and enforceable.

10. As of late 2025, a licensee of the '061 Patent marks licensed products with the '061 Patent pursuant to 35 U.S.C. § 287.

GENESIS' ACCUSED PRODUCTS

11. Genesis offers for sale multiple vehicles that include a device for sanitizing a surface or object, including the vehicles shown in the chart below.

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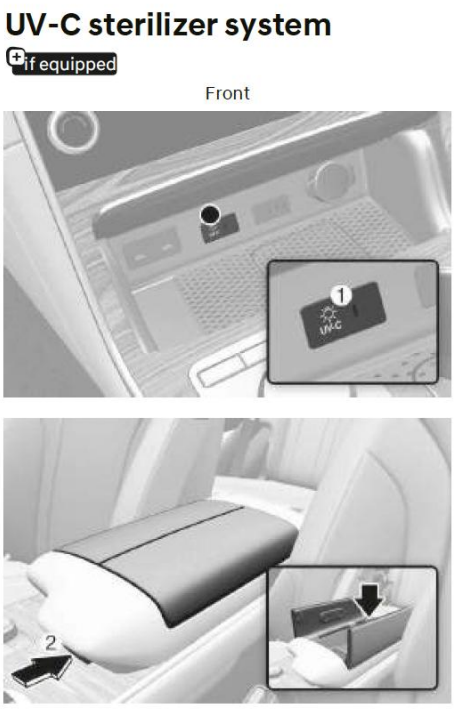
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Product	Representative Image(s)
G90[1]	 ①: UV-C sterilizer system button, ②: UV-C LED, ③: UV-C Indicator light (upper part of armrest touchscreen) 
GV80/ GV80 Coupe[2]	 

[1] Pictures are taken from Genesis' website and the G90 owner's manual, available at https://owners.genesis.com/genesis/us/mygenesis/manuals/glovebox-manual/2023/g90/2023-G90-Owners-Manual.pdf.

[2] Pictures are taken from Genesis' website and the GV80 owner's manual, available at https://www.genesis.com/content/dam/genesis-p2/id/assets/support/download-center/genesis-gv80-manual-en-250825.pdf

GV70/ GV70 Electrified[3]	**UV-C sterilizer system** if equipped  (1) Console storage button (2) UV-C sterilizer system button (3) UV-C sterilizer system indicator  

12. Together, the G90, GV80/GV80 Coupe, and GV70/Electrified GV70 will be referred to as the "Accused Products."

13. Genesis makes, imports into the United States, offers for sale, sells, and/or uses in the United States the Accused Products, which infringe at least one claim of the '061 Patent.

14. Attached to this Complaint as Exhibits C, D, and E are claim charts showing how each of the Genesis G90, GV80/GV80 Coupe, and GV70/Electrified GV70 infringe claims of the '061 Patent, respectively.

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[3] Pictures taken from Genesis' website and the GV70 Owner's Manual, available at https://www.genesis.com/content/dam/genesis-p2/id/assets/support/download-center/genesis-gv70-manual-en-250825.pdf.

COUNT I – PATENT INFRINGEMENT

'061 PATENT

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

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

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

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

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

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

PRAYER FOR RELIEF

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

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

B. The ascertainment of and award to Germ Dome of damages from the infringement of one or more claims of the '061 Patent, together with prejudgment

and post-judgment interest and any other costs and expenses permitted by law, under 35 U.S.C. § 284;

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

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

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

JURY DEMAND

Germ Dome hereby demands a trial by jury on all issues so triable.

Dated: April 13, 2026

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