

VIA EDIS

January 19, 2021

The Honorable Lisa R. Barton
Secretary
United States International Trade Commission
500 E Street, S.W.
Washington, D.C. 20436

Re: *Certain Cellular Signal Boosters, Repeaters, Bi-Directional Amplifiers, And Components Thereof* Inv. No. 337-TA-

Dear Secretary Barton:

In accordance with the Commission's Temporary Change to Filing Procedures dated March 16, 2020, Complainant Wilson Electronics LLC submits the following documents in support of their request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, concerning certain Cellular Signal Boosters, Repeaters, Bi-Directional Amplifiers, And Components Thereof, and violations of Section 337 by Cellphone-Mate, Inc. d/b/a SureCall and Shenzhen SureCall Communication Technology Co. Ltd. (collectively, "SureCall" or "Respondents"):

1. One (1) electronic copy of Complainant's verified non-confidential Complaint, pursuant to Commission Rule 210.8(a)(1)(i).
2. One (1) electronic copy of Complainant's verified confidential Complaint, pursuant to Commission Rule 210.8(a)(1)(ii).
3. One (1) electronic copy of the non-confidential Exhibits 1, 2, 4, 5, 6, 7, 8, 9, 22H-22J, 22Z-22CM and public versions of Confidential Exhibits 3, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22K-22M, and 22P-Y to the Complaint, pursuant to Commission Rules 210.8(a)(1)(i).
4. One (1) electronic copy of the certified versions of United States Patent Nos. 7,221,967; 7,409,186; 7,486,929; 7,729,669; 7,783,318; 8,583,033; 8,874,030 and one (1) electronic copy of the non-certified versions of United States Patent Nos. 8,583,034; 8,639,180; 8,755,399; 8,849,187; and 8,874,029 (collectively, the

- “Asserted Patents”), listed as Exhibits 1A through 1L to the Complaint, pursuant to Commission Rule 210.12(a)(9)(i). Certified copies of United States Patent Nos. 8,583,034; 8,639,180; 8,755,399; 8,849,187; and 8,874,029 will be provided by supplementation as soon as received.
5. One (1) electronic copy of the certified versions of assignment records for the Asserted Patents, listed as Exhibit 2A-2L to the Complaint, pursuant to Commission Rule 210.12(a)(9)(ii).
 6. One (1) electronic copy of Confidential Exhibits 3, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22K-22N, and 22P-Y to the Complaint, pursuant to Commission Rules 201.6(c) and 210.8(a)(1)(ii).
 7. One (1) electronic copy of the certified prosecution histories of each of the Asserted Patents, included as Appendices A, C, E, G, I, K, M, O, Q, S, U, and W to the Complaint, pursuant to Commission Rule 201.12(c)(1).
 8. One (1) electronic copy of each of the patents and applicable pages of each technical reference identified in the prosecution histories of the Asserted Patents as Appendices B, D, F, H, J, L, N, P, R, T, V, and X to the Complaint, pursuant to Commission Rule 210.12(c)(2).
 9. A letter and certification requesting confidential treat for the information contained in confidential Exhibits 3, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22K-22M, and 22P-22Y to the Complaint, pursuant to Commission Rules 201.6(b) and 210.5(d).
 10. A Statement of the Public Interest regarding the remedial orders sought by Complainant in the Complaint, pursuant to Commission Rule 210.8(b).
 11. Photographs of¹:
 - a. weBoost Installed Home Complete (Generation 2) (PWO460045)
 - b. weBoost Home Multiroom (Generation 2) (PWO460044)
 - c. weBoost Home Room (PWO460020)
 - d. weBoost Drive X (PWO460021)
 - e. weBoost Drive Sleek (PWO460035)

¹ Electronic Images Submitted As Substitutes Pursuant to ITC Notice, 85 Fed. Reg. 54 (March 19, 2020)

- f. WilsonPro Enterprise 4300 (PWO460052)
- g. WilsonPro Enterprise 1300 (PWO460049)
- h. WilsonPro Pro 1100 (PWO460047)
- i. WilsonPro Pro 70 Plus (PWO460027)
- j. weBoost Drive Reach (Generation 2) (PWO460054)

Please contact me with any questions regarding this submission. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Kirk R. Ruthenberg

Kirk R. Ruthenberg
Nicholas H. Jackson
Orrin J. Neitzke
DENTONS US LLP
1900 K Street, N.W.
Washington, DC 20006-1102
Telephone: (202) 496-7500
Facsimile: (202) 496-7756

Joel Bock
DENTONS US LLP
101 JFK Parkway
Short Hills, NJ 07078-2708
Telephone: (973) 912-7100
Facsimile: (973) 912-7199

David R. Metzger
DENTONS US LLP
233 South Wacker Drive
Suite 5900
Chicago, Illinois 60606-6361
Telephone: (312) 876-8000
Facsimile: (312) 876-7934

Counsel for Complainant Wilson Electronics LLC

Enclosures

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, DC**

In the Matter of
CERTAIN CELLULAR SIGNAL
BOOSTERS, REPEATERS,
BIDIRECTIONAL AMPLIFIERS, AND
COMPONENTS THEREOF

Investigation No. 337-TA - _____

**STATEMENT OF THE PUBLIC INTEREST BY COMPLAINANT WILSON
ELECTRONICS LLC**

Pursuant to United States International Trade Commission (“Commission”) Rule 19 C.F.R. § 210.8(b), Wilson Electronics LLC (“Wilson Electronics”) respectfully submits this Statement on the Public Interest with respect to the remedial orders it seeks against proposed Respondents Cellphone-Mate, Inc. d/b/a SureCall and Shenzhen SureCall Communication Technology Co. Ltd. (collectively, “SureCall” or “Respondents”).

Wilson Electronics seeks a limited exclusion order excluding SureCall’s cellular signal boosters, repeaters, bidirectional amplifiers, and components thereof (“Signal Boosters”) that infringe one or more asserted claims of United States Patents Nos. 7,221,967; 7,409,186; 7,486,929; 7,729,669; 7,783,318; 8,583,033; 8,639,180; 8,755,399; 8,849,187; 8,583,034; 8,874,029; and 8,874,030 (collectively, “the Asserted Patents”) from entry into the United States. Wilson Electronics also seeks a permanent cease-and-desist order prohibiting SureCall from engaging in the importation, use, marketing and/or advertising, distribution, offering for sale, sale after importation, or other transfer within the United States of the infringing products.

SureCall’s infringing Signal Boosters make up a small but significant portion of the market for such products sold in the United States and numerous other competitors sell substitute products that can easily replace SureCall’s market share. As discussed below, exclusion of the

infringing products identified in the Complaint would not have an adverse effect on public health and welfare, competitive conditions in the United States economy, the production of like or directly competitive articles in the United States, or United States consumers. Thus, the Commission should not delegate public interest fact-finding to the Administrative Law Judge. Indeed, doing so would require the Commission, the parties, and the public to undergo the unnecessary time and expense of discovery and trial for a Recommended Determination by the Administrative Law Judge on the public interest. If the Commission grants these remedial orders as a result of this investigation, there will be no adverse effect on the public interest. The public interest will, in fact, be served by granting the requested remedial orders.

I. THE REQUESTED REMEDIAL ORDERS ARE IN ACCORD WITH THE PUBLIC INTEREST

There is a strong public interest in protecting intellectual property rights. *Certain Baseband Processor Chips and Chipsets, Transmitter and Receiver (Radio) Chip, Power Control Chips, & Products Containing Same, Including Cellular Telephone Handsets*, Comm'n Op., Inv. No. 337-TA-543, at *239-40 (June 19, 2007). In this case, the requested remedial orders are in accordance with the public interest for at least the reasons set forth below.

A. EXPLANATION OF HOW THE ARTICLES POTENTIALLY SUBJECT TO THE REQUESTED REMEDIAL ORDERS ARE USED IN THE UNITED STATES.

SureCall's products potentially subject to remedial orders in the proposed Investigation are certain Signal Boosters that infringe one or more claims of the Asserted Patents. SureCall imports and sells infringing Signal Boosters ("the Accused Products") including, but not limited to, the following representative products: Fusion2Go 3.0 v.2, Fusion4Home 3.0, and Force8 Industrial. The Accused Products are used to amplify signals between mobile electronic devices and base stations/cell sites to provide consistent connectivity. Each of the Accused Products are

imported into, sold for importation in, and/or sold after importation into the United States by or on behalf of SureCall.

SureCall markets its Signal Boosters for residential, commercial, and vehicle uses. Consumers have numerous competitive products to choose from in the Signal Booster market that are readily interchangeable with SureCall's products and are available for purchase in the United States at the same online sales channels used by SureCall, such as Amazon.com, Lowes.com, HomeDepot.com, Walmart.com, and BestBuy.com. Wilson also offers its Signal Boosters for sale at brick and mortar Best Buy retail stores. SureCall's products are not available at brick and mortar stores. Signal Boosters sold by competitors of SureCall are readily available as substitutes for SureCall's products.

B. IDENTIFICATION OF PUBLIC HEALTH, SAFETY, OR WELFARE CONCERNS RELATING TO THE REQUESTED REMEDIAL ORDERS.

The Accused Products do not implicate significant public health, safety, or welfare concerns in the United States. There are many substitute Signal Boosters readily available to replace the subject articles if excluded, including without limitation Wilson's Signal Boosters, that can replace any of SureCall's products excluded from the U.S. market. Additionally, Accused Products already installed and being used in the United States do not require further hardware or software updates to operate properly and will therefore be unaffected by the requested remedial orders. Rather, should the Commission issue exclusion and cease-and-desist orders, it would have the beneficial effect of protecting Wilson Electronics' intellectual property rights and eliminating SureCall's unfair competition. *See id.* (highlighting "the strong public interest in enforcing intellectual property rights").

C. IDENTIFICATION OF LIKE OR DIRECTLY COMPETITIVE ARTICLES THAT THIRD PARTIES MAKE, WHICH COULD REPLACE THE SUBJECT ARTICLES IF THEY WERE EXCLUDED.

Numerous companies supply Signal Boosters that are substantially similar to, and serve as ready replacements for, the Accused Products. Sales of the Accused Products are a small fraction of the market for Signal Booster products in the United States and other companies could readily replace Accused Products excluded from the United States, including Wilson Electronics, which has over 60% of the Signal Booster market and has the manufacturing and distribution capacity to supply the needs of consumers who may have bought from SureCall in the absence of an exclusion order. Wilson Electronics also has licensed the Asserted Patents to two independent competitors, Signifi Mobile, Inc. (“Signifi”) and SolidRF Technology, Inc. (“SolidRF”), who can legally sell licensed Signal Boosters in the U.S. and could replace the subject articles if they were excluded. Additionally, another producer of Signal Boosters, Nextivity, sells Signal Boosters under the brand name CelFi, which products currently use a different non-infringing technology. Based upon a reasonable investigation, Wilson believes that SureCall accounted for less than 15% of the Signal Booster market in the U.S. in 2020 and that SolidRf, Signifi, and CelFi alone could make up the current sales of SureCall. Indeed, Wilson alone could easily make up SureCall’s market share. Consumers therefore have ready access to competitive, substitute devices. Accordingly, exclusion of the Accused Products would not harm the public interest.

D. SURECALL COMPETITORS ARE IN A POSITION TO READILY REPLACE THE EXCLUDED ARTICLES WITHIN A COMMERCIALY REASONABLE TIME.

As explained above, Wilson Electronics and SureCall’s other competitors in the United States have the capacity to replace the volume of articles subject to the requested remedial orders within a commercially reasonable time. Wilson Electronics could likely replace the supply of the

excluded articles promptly within the 60-day time period required for the presidential review period of any Final Determination finding that SureCall's products should be excluded. Wilson Electronics' two licensees and CelFi could further replace the supply of excluded articles given SureCall's small market share. The Signal Booster market is highly competitive, with dozens of suppliers offering potential replacement products for sale. There is also no reasonable basis to believe that exclusion of SureCall's infringing products from the marketplace would have any effect on the price of Signal Booster products, particularly in light of the very competitive Signal Booster market that includes many competitors on Amazon.com who underprice SureCall's Accused Products. Even if the proposed remedial orders did have some minor effect on price, it would not be contrary to the public interest. *Certain Lens-Fitted Film Packages*, Inv. No. 337-TA-406, Comm'n. Op., 1999 ITC LEXIS 202, at *40 (June 28, 1999) (finding that some price increase "does not justify a determination that the public interest in protecting intellectual property rights is in any way outweighed"). Given that there would be no unfilled void or price increase because of the ample availability of substitute products that could replace the volume of excluded Accused Products, any impact to the public interest will be negligible.

E. THE REQUESTED REMEDIAL ORDERS WOULD NOT ADVERSELY IMPACT CONSUMERS.

As noted above, the market share of SureCall is not significant enough to support any concern that either price or availability of Signal Boosters to consumers will be affected. Accordingly, the requested remedial orders in this matter will not adversely affect U.S. consumers.

II. CONCLUSION

The proposed remedial orders offer no concern to the public interest, and the public interest will be served by protecting Wilson Electronics' intellectual property rights.

Dated: January 19, 2021

Respectfully submitted,

By: /s/ Kirk R. Ruthenberg
Kirk R. Ruthenberg
Nicholas H. Jackson
Orrin J. Neitzke
DENTONS US LLP
1900 K Street, N.W.
Washington, DC 20006-1102
Telephone: (202) 496-7500
Facsimile: (202) 496-7756

Joel Bock
DENTONS US LLP
101 JFK Parkway
Short Hills, NJ 07078-2708
Telephone: (973) 912-7100
Facsimile: (973) 912-7199

David R. Metzger
DENTONS US LLP
233 South Wacker Drive
Suite 5900
Chicago, Illinois 60606-6361
Telephone: (312) 876-8000
Facsimile: (312) 876-7934

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, DC**

In the Matter of
CERTAIN CELLULAR SIGNAL
BOOSTERS, REPEATERS, BI-
DIRECTIONAL AMPLIFIERS, AND
COMPONENTS THEREOF

Investigation No. 337-TA-_____

**VERIFIED COMPLAINT UNDER
SECTION 337 OF THE TARIFF ACT OF 1930**

COMPLAINANT

Wilson Electronics LLC
3301 E. Deseret Drive,
St. George, UT 84790
Telephone: (435) 673-5021

COUNSEL FOR COMPLAINANT

Kirk R. Ruthenberg
Nicholas H. Jackson
Orrin J. Neitzke
DENTONS US LLP
1900 K Street, N.W.
Washington, DC 20006-1102
Telephone: (202) 496-7500
Facsimile: (202) 496-7756

Joel Bock
DENTONS US LLP
101 JFK Parkway
Short Hills, NJ 07078-2708
Telephone: (973) 912-7100
Facsimile: (973) 912-7199

David R. Metzger
DENTONS US LLP
233 South Wacker Drive
Suite 5900
Chicago, Illinois 60606-6361
Telephone: (312) 876-8000
Facsimile: (312) 876-7934

PROPOSED RESPONDENTS

Cellphone-Mate, Inc. d/b/a SureCall
48346 Milmont Drive
Fremont, CA 94538
Telephone: (510) 770-0469

Shenzhen SureCall Communication
Technology Co. Ltd.
Yangtian Rd. 72 Area Baoan District
Shenzhen, China
518040
Telephone: 26613360-816

TABLE OF CONTENTS

LIST OF EXHIBITS..... iv

LIST OF PHYSICAL/PHOTO EXHIBITS..... xii

LIST OF APPENDICES..... xiii

I. INTRODUCTION 1

II. THE PARTIES..... 8

 A. Complainant..... 8

 B. Respondents 11

III. THE PATENTS AT ISSUE..... 15

 A. Group I – Controlling Amplification and Common Direction Duplexer 15

 1. U.S. Patent No. 7,221,967 – Enhanced Gain Selected Cell Phone Booster System
 15

 2. U.S. Patent No. 7,729,669 – Processor Controlled Variable Gain Cellular
 Network Amplifier..... 16

 3. U.S. Patent No. 7,783,318 – Cellular Network Amplifier With Automated Output
 Power Control 16

 4. U.S. Patent No. 8,583,033 – Oscillation Protected Amplifier with Base Station
 Overload and Noise Floor Protection 17

 5. U.S. Patent No. 8,755,399 – Common-Direction Duplexer 17

 6. U.S. Patent No. 8,849,187 – Radio Frequency Amplifier Noise Reduction System
 18

 B. Group II – Detecting, Mitigating and/or Controlling Oscillation..... 19

 1. U.S. Patent No. 7,409,186 – Detection and Elimination of Oscillation within
 Cellular Network Amplifiers 19

 2. U.S. Patent No. 7,486,929 – Processor-Controlled Variable Gain Cellular
 Network Amplifiers with Oscillation Detection Circuit..... 19

 3. U.S. Patent No. 8,583,034 – Verifying and Mitigating Oscillation In Amplifiers 20

 4. U.S. Patent No. 8,639,180 – Verifying and Mitigating Oscillation In Amplifiers 20

 5. U.S. Patent No. 8,874,029 – Verifying Oscillation in Amplifiers and the
 Mitigation Thereof..... 21

6.	U.S. Patent No. 8,874,030 – Oscillation Detection and Oscillation Mitigation in Amplifiers	22
C.	Foreign Counterparts	22
D.	Licensees.....	23
E.	Non-Technical Description of the Patented Technologies	23
IV.	THE PRODUCTS AT ISSUE	28
A.	Complainant’s Products	28
B.	Respondents’ Infringing Products.....	29
V.	UNLAWFUL AND UNFAIR ACTS OF THE RESPONDENTS	29
VI.	SPECIFIC INSTANCES OF IMPORTATION AND SALE	30
VII.	CLASSIFICATION OF THE INFRINGING PRODUCTS UNDER THE HARMONIZED TARIFF SCHEDULE OF THE UNITED STATES,.....	36
VIII.	RELATED LITIGATION	36
IX.	DOMESTIC INDUSTRY	36
A.	Technical Prong	37
B.	Economic Prong.....	37
X.	RELIEF REQUESTED.....	39

Exhibit List

Exhibit Number	Description	Designation
1	Certified Copies of the Asserted Patents	
A	U.S. Patent No. 7,221,967	Public
B	U.S. Patent No. 7,409,186	Public
C	U.S. Patent No. 7,486,929	Public
D	U.S. Patent No. 7,729,669	Public
E	U.S. Patent No. 7,783,318	Public
F	U.S. Patent No. 8,583,033	Public
G	U.S. Patent No. 8,583,034	Public
H	U.S. Patent No. 8,639,180	Public
I	U.S. Patent No. 8,755,399	Public
J	U.S. Patent No. 8,849,187	Public
K	U.S. Patent No. 8,874,029	Public
L	U.S. Patent No. 8,874,030	Public
2	Certified Assignment Records of the Asserted Patents	
A	Certified Assignment Record for U.S. Patent No. 7,221,967	Public
B	Certified Assignment Record for U.S. Patent No. 7,409,186	Public
C	Certified Assignment Record for U.S. Patent No. 7,486,929	Public
D	Certified Assignment Record for U.S. Patent No. 7,729,669	Public
E	Certified Assignment Record for U.S. Patent No. 7,783,318	Public
F	Certified Assignment Record for U.S. Patent No. 8,583,033	Public
G	Certified Assignment Record for U.S. Patent No. 8,583,034	Public
H	Certified Assignment Record for U.S. Patent No. 8,639,180	Public
I	Certified Assignment Record for U.S. Patent No. 8,755,399	Public
J	Certified Assignment Record for U.S. Patent No. 8,849,187	Public
K	Certified Assignment Record for U.S. Patent No. 8,874,029	Public
L	Certified Assignment Record for U.S. Patent No. 8,874,030	Public
3	Licensees	
A	List of Licensees of Asserted Patents	Confidential
4	Accused Products' Packaging and Images	
A	SureCall Fusion4Home Yagi/Whip Cell Phone Signal Booster Kit	Public
B	SureCall Fusion2Go 3.0 Cell Phone Booster for Vehicle	Public
C	SureCall Force8 Industrial Amplifier	Public
5	Domestic Industry Products' Packaging and Images	
A	weBoost Installed Home Complete (Generation 2) (PWO460045)	Public
B	weBoost Home Multiroom (Generation 2) (PWO460044)	Public
C	weBoost Home Room (PWO460020)	Public

D	weBoost Drive X (PWO460021)	Public
E	weBoost Drive Sleek (PWO460035)	Public
F	WilsonPro Enterprise 4300 (PWO460052)	Public
G	WilsonPro Enterprise 1300 (PWO460049)	Public
H	WilsonPro Pro 1100 (PWO460047)	Public
I	WilsonPro Pro 70 Plus (PWO460027)	Public
J	weBoost Drive Reach (Generation 2) (PWO460054)	Public
6	Importation	
A	ShenZhen SureCall Comm. Tech Co. Ltd. Panjiva Report	Public
B	SureCall Fusion2Go 3.0 Cell Phone Booster for Vehicle Order and Shipment Information	Public
C	SureCall Fusion4Home 3.0 Cell Phone Signal Booster Kit Order and Shipment Information	Public
D	SureCall Force8 Industrial Amplifier FCC Test Report	Public
	Infringement Analysis Against Accused Products	
7	SureCall Fusion2Go 3.0 Cell Phone Signal Booster Kit	
A	U.S. Patent No. 7,221,967	Public
B	U.S. Patent No. 7,409,186	Public
C	U.S. Patent No. 7,486,929	Public
D	U.S. Patent No. 7,729,669	Public
E	U.S. Patent No. 7,783,318	Public
F	U.S. Patent No. 8,583,033	Public
G	U.S. Patent No. 8,583,034	Public
H	U.S. Patent No. 8,639,180	Public
I	U.S. Patent No. 8,755,399	Public
J	U.S. Patent No. 8,849,187	Public
K	U.S. Patent No. 8,874,029	Public
L	U.S. Patent No. 8,874,030	Public
8	SureCall Fusion4Home 3.0 Phone Signal Booster Kit	
A	U.S. Patent No. 7,221,967	Public
B	U.S. Patent No. 7,409,186	Public
C	U.S. Patent No. 7,486,929	Public
D	U.S. Patent No. 7,729,669	Public
E	U.S. Patent No. 7,783,318	Public
F	U.S. Patent No. 8,583,033	Public
G	U.S. Patent No. 8,583,034	Public
H	U.S. Patent No. 8,639,180	Public
I	U.S. Patent No. 8,755,399	Public
J	U.S. Patent No. 8,849,187	Public
K	U.S. Patent No. 8,874,029	Public

	L	U.S. Patent No. 8,874,030	Public
9		SureCall Force8 Industrial Amplifier	
	A	U.S. Patent No. 7,221,967	Public
	B	U.S. Patent No. 7,409,186	Public
	C	U.S. Patent No. 7,486,929	Public
	D	U.S. Patent No. 7,729,669	Public
	E	U.S. Patent No. 7,783,318	Public
	F	U.S. Patent No. 8,583,033	Public
	G	U.S. Patent No. 8,583,034	Public
	H	U.S. Patent No. 8,639,180	Public
	I	[RESERVED]	N/A
	J	U.S. Patent No. 8,849,187	Public
	K	U.S. Patent No. 8,874,029	Public
	L	U.S. Patent No. 8,874,030	Public
10		[RESERVED]	
		Domestic Industry	
11		weBoost Installed Home Complete (Generation 2) (PWO460045) Claim Charts	
	A	U.S. Patent No. 7,221,967	Confidential
	B	U.S. Patent No. 7,409,186	Confidential
	C	U.S. Patent No. 7,486,929	Confidential
	D	U.S. Patent No. 7,729,669	Confidential
	E	U.S. Patent No. 7,783,318	Confidential
	F	U.S. Patent No. 8,583,033	Confidential
	G	U.S. Patent No. 8,583,034	Confidential
	H	U.S. Patent No. 8,639,180	Confidential
	I	U.S. Patent No. 8,755,399	Confidential
	J	U.S. Patent No. 8,849,187	Confidential
	K	U.S. Patent No. 8,874,029	Confidential
	L	U.S. Patent No. 8,874,030	Confidential
12		weBoost Home Multiroom (Generation 2) (PWO460044) Claim Charts	
	A	U.S. Patent No. 7,221,967	Confidential
	B	U.S. Patent No. 7,409,186	Confidential
	C	U.S. Patent No. 7,486,929	Confidential
	D	U.S. Patent No. 7,729,669	Confidential
	E	U.S. Patent No. 7,783,318	Confidential
	F	U.S. Patent No. 8,583,033	Confidential
	G	U.S. Patent No. 8,583,034	Confidential

H	U.S. Patent No. 8,639,180	Confidential
I	U.S. Patent No. 8,755,399	Confidential
J	U.S. Patent No. 8,849,187	Confidential
K	U.S. Patent No. 8,874,029	Confidential
L	U.S. Patent No. 8,874,030	Confidential
13	WilsonPro Enterprise 4300 (PWO460052) Claim Charts	
A	U.S. Patent No. 7,221,967	Confidential
B	U.S. Patent No. 7,409,186	Confidential
C	U.S. Patent No. 7,486,929	Confidential
D	U.S. Patent No. 7,729,669	Confidential
E	U.S. Patent No. 7,783,318	Confidential
F	U.S. Patent No. 8,583,033	Confidential
G	U.S. Patent No. 8,583,034	Confidential
H	U.S. Patent No. 8,639,180	Confidential
I	U.S. Patent No. 8,755,399	Confidential
J	U.S. Patent No. 8,849,187	Confidential
K	U.S. Patent No. 8,874,029	Confidential
L	U.S. Patent No. 8,874,030	Confidential
14	weBoost Drive X (PWO460021) Claim Charts	
A	U.S. Patent No. 7,221,967	Confidential
B	U.S. Patent No. 7,409,186	Confidential
C	U.S. Patent No. 7,486,929	Confidential
D	U.S. Patent No. 7,729,669	Confidential
E	U.S. Patent No. 7,783,318	Confidential
F	U.S. Patent No. 8,583,033	Confidential
G	U.S. Patent No. 8,583,034	Confidential
H	U.S. Patent No. 8,639,180	Confidential
I	U.S. Patent No. 8,755,399	Confidential
J	U.S. Patent No. 8,849,187	Confidential
K	U.S. Patent No. 8,874,029	Confidential
L	U.S. Patent No. 8,874,030	Confidential
15	weBoost Drive Sleek (PWO460035) Claim Charts	
A	U.S. Patent No. 7,221,967	Confidential
B	U.S. Patent No. 7,409,186	Confidential
C	U.S. Patent No. 7,486,929	Confidential
D	U.S. Patent No. 7,729,669	Confidential
E	U.S. Patent No. 7,783,318	Confidential
F	U.S. Patent No. 8,583,033	Confidential
G	U.S. Patent No. 8,583,034	Confidential

H	U.S. Patent No. 8,639,180	Confidential
I	U.S. Patent No. 8,755,399	Confidential
J	U.S. Patent No. 8,849,187	Confidential
K	U.S. Patent No. 8,874,029	Confidential
L	U.S. Patent No. 8,874,030	Confidential
16	weBoost Home Room Claim Charts (PWO460020)	
A	U.S. Patent No. 7,221,967	Confidential
B	U.S. Patent No. 7,409,186	Confidential
C	U.S. Patent No. 7,486,929	Confidential
D	U.S. Patent No. 7,729,669	Confidential
E	U.S. Patent No. 7,783,318	Confidential
F	U.S. Patent No. 8,583,033	Confidential
G	U.S. Patent No. 8,583,034	Confidential
H	U.S. Patent No. 8,639,180	Confidential
I	U.S. Patent No. 8,755,399	Confidential
J	U.S. Patent No. 8,849,187	Confidential
K	U.S. Patent No. 8,874,029	Confidential
L	U.S. Patent No. 8,874,030	Confidential
17	WilsonPro Enterprise 1300 (PWO460049) Claim Charts	
A	U.S. Patent No. 7,221,967	Confidential
B	U.S. Patent No. 7,409,186	Confidential
C	U.S. Patent No. 7,486,929	Confidential
D	U.S. Patent No. 7,729,669	Confidential
E	U.S. Patent No. 7,783,318	Confidential
F	U.S. Patent No. 8,583,033	Confidential
G	U.S. Patent No. 8,583,034	Confidential
H	U.S. Patent No. 8,639,180	Confidential
I	U.S. Patent No. 8,755,399	Confidential
J	U.S. Patent No. 8,849,187	Confidential
K	U.S. Patent No. 8,874,029	Confidential
L	U.S. Patent No. 8,874,030	Confidential
18	WilsonPro Pro 1100 (PWO460047) Claim Charts	
A	U.S. Patent No. 7,221,967	Confidential
B	U.S. Patent No. 7,409,186	Confidential
C	U.S. Patent No. 7,486,929	Confidential
D	U.S. Patent No. 7,729,669	Confidential
E	U.S. Patent No. 7,783,318	Confidential
F	U.S. Patent No. 8,583,033	Confidential
G	U.S. Patent No. 8,583,034	Confidential

H	U.S. Patent No. 8,639,180	Confidential
I	U.S. Patent No. 8,755,399	Confidential
J	U.S. Patent No. 8,849,187	Confidential
K	U.S. Patent No. 8,874,029	Confidential
L	U.S. Patent No. 8,874,030	Confidential
19	WilsonPro Pro 70 Plus (PWO460027) Claim Charts	
A	U.S. Patent No. 7,221,967	Confidential
B	U.S. Patent No. 7,409,186	Confidential
C	U.S. Patent No. 7,486,929	Confidential
D	U.S. Patent No. 7,729,669	Confidential
E	U.S. Patent No. 7,783,318	Confidential
F	U.S. Patent No. 8,583,033	Confidential
G	U.S. Patent No. 8,583,034	Confidential
H	U.S. Patent No. 8,639,180	Confidential
I	U.S. Patent No. 8,755,399	Confidential
J	U.S. Patent No. 8,849,187	Confidential
K	U.S. Patent No. 8,874,029	Confidential
L	U.S. Patent No. 8,874,030	Confidential
20	Drive Reach (Generation 2) (PWO460054) Claim Charts	
A	U.S. Patent No. 7,221,967	Confidential
B	U.S. Patent No. 7,409,186	Confidential
C	U.S. Patent No. 7,486,929	Confidential
D	U.S. Patent No. 7,729,669	Confidential
E	U.S. Patent No. 7,783,318	Confidential
F	U.S. Patent No. 8,583,033	Confidential
G	U.S. Patent No. 8,583,034	Confidential
H	U.S. Patent No. 8,639,180	Confidential
I	U.S. Patent No. 8,755,399	Confidential
J	U.S. Patent No. 8,849,187	Confidential
K	U.S. Patent No. 8,874,029	Confidential
L	U.S. Patent No. 8,874,030	Confidential
21	Domestic Industry Declaration	
A	Declaration of Joel Johnson	Confidential
22	Documents and Publications	
H	FCC Application Documents for SureCall Fusion2Go 3.0 (F2GO3)	Public
I	FCC Application Documents for SureCall Fusion4Home 3.0 (F4HOME)	Public
J	FCC Application Documents for SureCall Force8 Industrial Signal Booster (FORCE8-IND)	Public
K	PWO460020 Schematic	Confidential

L	Operational Description of PWO460020	Confidential
M	PWO460021 Schematic	Confidential
N	Operational Description of PWO460021	Confidential
O	[RESERVED]	N/A
P	PWO460027 Schematic	Confidential
Q	Operational Description of PWO460027	Confidential
R	PWO460035 Schematic	Confidential
S	Operational Description of PWO460035	Confidential
T	PWO460044 Schematic	Confidential
U	PWO460045 Schematic	Confidential
V	PWO460047 Schematic	Confidential
W	PWO460049 Schematic	Confidential
X	PWO460052 Schematic	Confidential
Y	PWO460054 Schematic	Confidential
Z	Multilayer Organic 0806 CDMA Diplexer Datasheet	Public
AA	Multilayer Ceramic Devices (filters/diplexers/baluns) Datasheet	Public
AB	TQQ1213 LTE B12/B13 Triplexer Filter Module Datasheet	Public
AC	RFSW6042 Low Insertion High Isolation SP4T Switch Datasheet	Public
AD	HMC6357MS8GE Logarithmic Detector/Controller Datasheet	Public
AE	PIC16(L)F1946/57 64 Pin Flash Based, 8 Bit Microcontroller Datasheet	Public
AF	QPC Absorptive High Isolation SP5t Switch Datasheet	Public
AG	RFLA9002 Dual Low Noise Amplifier Datasheet	Public
AH	Vishay Dale CZA Thick Film Chip Resistor Attenuator Datasheet	Public
AI	TAIYO YUDEN SAW/FBAR Devices Datasheet	Public
AJ	Panasonic EXB 14AT, 24AT Chip Attenuator datasheet	Public
AK	SKY77733 SkyHi Power Amplifier Module for LTE bands 13 and 14 Datasheet	Public
AL	RFSA Digital Step Attenuator Datasheet	Public
AM	SKY66013: 700 to 800 MHz, +19dBm Linear Power Amplifier Datasheet	Public
AN	Qorvo 50MHz-4000 MHz Active Bias Cascade SiGe HMT MMIC Amplifier Datasheet	Public
AO	SKY77737 SkyHi Power Amplifier Module for LTE Bands 12/17 Datasheet	Public
AP	Analog Devices HMC8037 Silicon Digital Step Attenuator Datasheet	Public
AQ	Murata LFD2189MDPGC103 diplexer Product Specification	Public
AR	Qorvo QPQ1214 LTE B12/B13 Triplexer Module Datasheet	Public
AS	Sawnics SD-070705-C5E Wireless SAW Duplexer Datasheet	Public
AT	Guerrilla RF GRF4002 Broadband Low Noise Amplifier Datasheet	Public

AU	Qorvo QPA4463A DC-3500 MHz Cascadable SiGe HBT Amplifier	Public
AV	Linear Technologies LT5534 50 MHz to 3GHz RF Power Detector Datasheet	Public
AW	Avago Technologies ACPM-5813 Power Amplifier Module for LTE Band 13/14 Datasheet	Public
AX	TAIYO YUDEN FBAR/SAW Devices F6HG2G441EG65 Datasheet	Public
AY	SKY13330-397LF: 0.1 to 6.0 GHz SPDT Swith Datasheet	Public
AZ	Qorvo QPA4363A DC-4000 MHz Cascadable SiGe HBT Amplifier	Public
BA	Murata LFD21892MDPFC065 Dual Band Diplexer Datasheet	Public
BB	Infinean BGS12SN6 Wideband RF SPDT Switch Datasheet	Public
BC	Guerilla RF GRF2133 Ultra High Gain Low Noise Amplifier Datasheet	Public
BD	Guerilla RF GRF5507 High Linearity Power Amplifier Datasheet	Public
BE	Murata SAFFB742MAA0F0A SAW Single Filter for Band 12/13 Datasheet	Public
BF	Sawnics SD707CPB SAW Duplexer Datasheet	Public
BG	TriQuint 857217 742.5 MHz SAW Filter Datasheet	Public
BH	STM32F401VET6 32bit Microcontroller Datasheet	Public
BI	Guerilla RF GRF4004 Broadband Low Noise Amplifier/ Linear Drive Datasheet	Public
BJ	Guerilla RF GRF2014 Broadband Linear Gain Block Datasheet	Public
BK	Skyworks AWB7124: Small-cell Power Amplifier Datasheet	Public
BL	Guerilla RF GRF2105 Enhanced Gain Flatness Low Noise Amplifier Datasheet	Public
BM	PAT0510S-C-7DB-T10 Precision Chip Attenuator Datasheet	Public
BN	Guerilla RF GRF2013 Broadband Linear Gain Block Datasheet	Public
BO	Skyworks AWB7125 860 MHz to 894 MHz Small Cell Power Amplifier Datasheet	Public
BP	AVX RF CP0402 High Directivity LGA Coupler Datasheet	Public
BQ	CTS Corp. XCBC0822A 380-960 vs. 1710-2690 MHz Cross-Band Combiner Datasheet	Public
BR	STM32F777, STM32F778A, STM32F779 32bit microcontroller Datasheet	Public
BS	Guerilla RF GRF2114 Broadband Low Noise Amplifier/Linear Driver Datasheet	Public
BT	Guerilla RF GRF2070 Ultra-Low Noise Amplifier Datasheet	Public
BU	WP4M+ Power Splitter/Combiner Datasheet	Public
BV	ON Semiconductor MC74HCT4051ADTR2G Analog Multiplexers/Demultiplexers Datasheet	Public
BW	Guerrila RF GRF4142 Low Noise Amplifier w/Bypass Datasheet	Public
BX	Peregrine Semiconductor PE4312 Product Specification	Public
BY	IDT F1953 6-bit Digital Step Attenuator Datasheet	Public

BZ	Guerilla RF GRF5518 High Linearity Power Amplifier Datasheet	Public
CA	Guerilla RF GRF5508 High Linearity Power Amplifier Datasheet	Public
CB	Guerilla RF GRF5517 High Linearity Power Amplifier Datasheet	Public
CC	ST Microelectronics STM32F105VCT6 microcontroller Datasheet	Public
CD	Sawnics SF-0707T2-C13, Band 12 Filter Datasheet	Public
CE	Sawnics SM070602 SAW Module for Band 12/13 Datasheet	Public
CF	ST MicroElectronics STM32G070cm microcontroller Datasheet	Public
CG	RFPA1005 Linear Power Amplifier Datasheet	Public
CH	Sawnics SA707BM LTE, RF SAW Filter Datasheet	Public
CI	Sawnics SF-074202-S20 Band 12/13 DL Repeater RF SAW Filter Datasheet	Public
CJ	MuRata Hybrid Coupler LDJ21806M03BA087 Datasheet	Public
CK	Parton DMH0743DJA Datasheet	Public
CL	Sawnics SF-070703-C23 Band 12 RF SAW Filter Datasheet	Public
CM	Sawnics SM-173202-P53 SAW Module for Band2-4 DISO Datasheet	Public



Physical/Photo Exhibit List¹

Physical/ Photo Exhibit Number	Description	Designation
1	Accused Products	
A	SureCall Fusion4Home 3.0 Cell Phone Signal Booster Kit	Public
B	SureCall Fusion2Go 3.0 Cell Phone Booster for Vehicle	Public
C	SureCall Force8 Industrial Amplifier	Public
2	Domestic Industry Products	
A	weBoost Installed Home Complete	Public
B	weBoost Home Multiroom (Generation 2)	Public
C	weBoost Home Room	Public
D	weBoost Drive Reach	Public
E	weBoost Drive X	Public
F	weBoost Drive Sleek	Public
G	WilsonPro Enterprise 4300	Public
H	WilsonPro Enterprise 1300	Public
I	WilsonPro Pro 1100	Public
J	WilsonPro Pro 70 Plus	Public

¹ Electronic Images Submitted As Substitutes Pursuant to ITC Notice, 85 Fed. Reg. 54 (March 19, 2020).

Appendices List

Appendix	Description	Designation
	Certified Prosecution Histories and Cited References	
A	Certified Prosecution History for U.S. Patent No. 7,221,967	Public
B	Cited References for U.S. Patent No. 7,221,967	Public
C	Certified Prosecution History for U.S. Patent No. 7,409,186	Public
D	Cited References for U.S. Patent No. 7,409,186	Public
E	Certified Prosecution History for U.S. Patent No. 7,486,929	Public
F	Cited References for U.S. Patent No. 7,486,929	Public
G	Certified Prosecution History for U.S. Patent No. 7,729,669	Public
H	Cited References for U.S. Patent No. 7,729,669	Public
I	Certified Prosecution History for U.S. Patent No. 7,783,318	Public
J	Cited References for U.S. Patent No. 7,783,318	Public
K	Certified Prosecution History for U.S. Patent No. 8,583,033	Public
L	Cited References for U.S. Patent No. 8,583,033	Public
M	Certified Prosecution History for U.S. Patent No. 8,583,034	Public
N	Cited References for U.S. Patent No. 8,583,034	Public
O	Certified Prosecution History for U.S. Patent No. 8,639,180	Public
P	Cited References for U.S. Patent No. 8,639,180	Public
Q	Certified Prosecution History for U.S. Patent No. 8,755,399	Public
R	Cited References for U.S. Patent No. 8,755,399	Public
S	Certified Prosecution History for U.S. Patent No. 8,849,187	Public
T	Cited References for U.S. Patent No. 8,849,187	Public
U	Certified Prosecution History for U.S. Patent No. 8,874,029	Public
V	Cited References for U.S. Patent No. 8,874,029	Public
W	Certified Prosecution History for U.S. Patent No. 8,874,030	Public
X	Cited References for U.S. Patent No. 8,874,030	Public

[REDACTED]

[REDACTED]

I. **INTRODUCTION**

1. Wilson Electronics, LLC (“Wilson Electronics” or “Complainant”) files this Complaint and respectfully requests that the United States International Trade Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended (19 U.S.C. § 1337), to remedy the unlawful and unauthorized importation into the United States, sale for importation into the United States, or sale within the United States after importation of certain cellular² signal boosters, repeaters, bi-directional amplifiers, and components thereof (collectively the “Accused Products”) sold for importation, imported, and/or sold after importation by Cellphone-Mate, Inc. d/b/a SureCall and Shenzhen SureCall Communication Technology Co. Ltd. (collectively, “SureCall” or “Respondents”).

2. Wilson Electronics is the leading manufacturer and seller of cellular signal boosters, repeaters, bi-directional amplifiers, and components thereof (collectively “Signal Boosters”) in the United States, has made substantial investments in research, development, manufacture and sale of the domestic industry products identified in this Complaint, is headquartered in Utah and has its manufacturing, engineering, and design facilities solely in the United States, located in St. George, Utah and Richardson, Texas. Since its formation more than 20 years ago, Wilson Electronics has developed leading innovations in Signal Boosters and has obtained patent protection for its inventions, including the twelve (12) U.S. patents asserted against Respondents.

3. The Accused Products manufactured, imported, offered for sale, and/or sold by Respondents directly and/or indirectly infringe, literally or under the doctrine of equivalents, under 19 U.S.C. § 1337(a)(1)(B)(i), one or more of the following identified claims

² Cellular communications are radio waves that operate on various frequencies within the ultra-high frequency (UHF) band that have been assigned for cellular compatible devices, such as cell phones, to connect to cellular networks.

(the “Asserted Claims”) of the following U.S. Patents (the “Asserted Patents”), described below in Sections III.A - III.L, owned by Wilson Electronics:

Patent Number	Claim Number ³
U.S. Patent No. 7,221,967 (“the ’967 Patent”)	Claims 1* , 4* , 5-6, 7* , and 9
U.S. Patent No. 7,409,186 (“the ’186 Patent”)	Claim 1*
U.S. Patent No. 7,486,929 (“the ’929 Patent”)	Claims 1* , 5-7, 10* , and 14
U.S. Patent No. 7,729,669 (“the ’669 Patent”)	Claims 1* , 4, 9-10
U.S. Patent No. 7,783,318 (“the ’318 Patent”)	Claims 1*-3
U.S. Patent No. 8,583,033 (“the ’033 Patent”)	Claims 19*-21
U.S. Patent No. 8,583,034 (“the ’034 Patent”)	Claims 1*-14 , 15* , 16-20
U.S. Patent No. 8,639,180 (“the ’180 Patent”)	Claims 10*-14 , 16-17
U.S. Patent No. 8,755,399 (“the ’399 Patent”)	Claims 1* , 2- 3* , 4-7, 10* , 11, 12
U.S. Patent No. 8,849,187 (“the ’187 Patent”)	Claims 1*-3
U.S. Patent No. 8,874,029 (“the ’029 Patent”)	Claims 1*-5 , 6- 7* , 8* , 9-10, 13*-15
U.S. Patent No. 8,874,030 (“the ’030 Patent”)	Claims 1*-12 , 13* , 14- 24*

4. The ’967 Patent, attached as Exhibit 1A, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics’ permission to achieve improved cellular coverage and reliability with the Accused Products. The ’967 Patent discloses inventions relating to amplification of cellular signals, including cell phone output signals, including automatic gain control. Complainant owns by assignment the ’967 Patent, which is a valid and enforceable patent. Exhibit 2A.

5. The ’186 Patent, attached as Exhibit 1B, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the

³ Bolded claim numbers with an asterisk* are independent claims.

[REDACTED]

field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '186 Patent discloses inventions relating to amplifier systems for amplifying cellular signals while mitigating oscillation. Complainant owns by assignment the '186 Patent, which is a valid and enforceable patent. Exhibit 2B.

6. The '929 Patent, attached as Exhibit 1C, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '929 Patent discloses inventions relating to the detection and mitigation of oscillation in a network amplifier. Complainant owns by assignment the '929 Patent, which is a valid and enforceable patent. Exhibit 2C.

7. The '669 Patent, attached as Exhibit 1D, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '669 Patent discloses inventions relating to amplifier systems for amplifying cellular signals by a network amplifier, including automatic gain control. Complainant owns by assignment the '669 Patent, which is a valid and enforceable patent. Exhibit 2D.

8. The '318 Patent, attached as Exhibit 1E, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '318 Patent discloses

[REDACTED]

inventions relating to amplifier systems for amplifying cellular signals while maintaining the output power level of the amplifier below predetermined limits, including automatic gain control. Complainant owns by assignment the '318 Patent, which is a valid and enforceable patent. Exhibit 2E.

9. The '033 Patent, attached as Exhibit 1F, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '033 Patent discloses inventions relating to methods for setting the gain of an amplifier system while reducing any accompanying increased noise floor, power overload, and signal distortion that may be associated with using amplifiers, and minimizing or mitigating oscillation. Complainant owns by assignment the '033 Patent, which is a valid and enforceable patent. Exhibit 2F.

10. The '034 Patent, attached as Exhibit 1G, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '034 Patent discloses inventions related to methods for the detection and mitigation of oscillation in a booster amplifier. Complainant owns by assignment the '034 Patent, which is a valid and enforceable patent. Exhibit 2G.

11. The '180 Patent, attached as Exhibit 1H, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '180 Patent discloses

[REDACTED]

inventions relating to methods for determining an oscillation amplification margin of a booster amplifier within a wireless network. Complainant owns by assignment the '180 Patent, which is a valid and enforceable patent. Exhibit 2H.

12. The '399 Patent, attached as Exhibit 1I, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '399 Patent discloses inventions relating to a common-direction duplexer configured to pass the uplink frequencies for Bands 12 and 13 of the 700 MHz Third Generation Partnership Project (3GPP) standard. Complainant owns by assignment the '399 Patent, which is a valid and enforceable patent. Exhibit 2I.

13. The '187 Patent, attached as Exhibit 1J, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '187 Patent discloses inventions relating to reducing an effect of amplified thermal noise levels in a wireless network. Complainant owns by assignment the '187 Patent, which is a valid and enforceable patent. Exhibit 2J.

14. The '029 Patent, attached as Exhibit 1K, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '029 Patent discloses inventions related to methods for the detection and mitigation of oscillation in a booster amplifier.

[REDACTED]

Complainant owns by assignment the '029 Patent, which is a valid and enforceable patent. Exhibit 2K.

15. The '030 Patent, attached as Exhibit 1L, protects one or more inventions developed by Wilson Electronics employees and covers extraordinarily valuable technology in the field of Signal Boosters that SureCall is using without Wilson Electronics' permission to achieve improved cellular coverage and reliability with the Accused Products. The '030 Patent discloses inventions related to methods for the detection and mitigation of oscillation in a booster amplifier. Complainant owns by assignment the '030 Patent, which is a valid and enforceable patent. Exhibit 2L.

16. Respondents' activities with respect to the importation into the United States, the sale for importation into the United States, and/or the sale within the United States after importation of the Accused Products, as defined above and as described more fully in Sections V below and the associated claim charts, are unlawful under 19 U.S.C. § 1337(a)(1)(B)(i) in that they constitute the infringement of one or more valid and enforceable claims of the '967, '186, '929, '669, '318, '033, '034, '180, '399, '187, '029, and/or '030 Patents. Additionally, a domestic industry as required by 19 U.S.C. §§ 1337(a)(2) and (3) exists in the United States relating to the technology protected by the Asserted Patents as described more fully in Section IX below.

17. Complainant seeks a limited exclusion order barring the infringing cellular signal boosters, repeaters, bi-directional amplifiers, and components thereof ("Signal Boosters") that are manufactured by or on the behalf of Respondents and are imported, offered for sale, sold, sold for importation, or sold after importation by Respondents or any of their affiliated companies, parents, subsidiaries, other related business entities, or their successors or assigns, from

[REDACTED]

[REDACTED]

entry for consumption into the United States, entry for consumption from a foreign trade-zone, or withdrawal from a warehouse for consumption for the remaining terms of the Asserted Patents, except under license of Complainant or as provided by law. Pursuant to Commission Rule 210.12(a)(12) requiring a clear statement in plain English of the category of products accused, Complainant provides the following statements. The SureCall Products are marketed and sold as “Cell Phone Signal Boosters,” “cellular signal boosters,” “signal boosters,” or similar names. SureCall uses product categories such as “Home Boosters”, “Mobile Boosters”, and “Office Boosters” or “Industrial Boosters/Amplifiers.” The relevant components of the SureCall Products that infringe the asserted patents are low-noise amplifiers, power amplifiers, filters, duplexers, triplexers, multiplexers, attenuators, power detectors, microcontrollers, and processors.

18. Complainant further seeks a permanent cease-and-desist order against Respondents prohibiting the importation, sale, offer for sale, advertisement, or solicitation of any sale by Respondents and any of their principals, stockholders, officers, directors, employees, agents, licensees, distributors, controlled (whether by stock ownership or otherwise) or majority-owned business entities, successors, and assigns, from either directly engaging in or for, with, or otherwise on behalf of Respondents: (A) importing or selling for importation into the United States of the Accused Products or other products that infringe any of the claims of the Asserted Patents; (B) marketing, distributing, offering for sale, selling, or otherwise transferring in the United States imported Accused Products and components thereof (such as, for example various low-noise amplifiers, power amplifiers, filters, duplexers, triplexers, multiplexers, attenuators, power detectors, microcontrollers, and processors) that infringe one or more claims of the Asserted Patents; (C) advertising imported Accused Products and components thereof (such as, for example, various low-noise amplifiers, power amplifiers, filters, duplexers, triplexers, multiplexers,

[REDACTED]

[REDACTED]

attenuators, power detectors, microcontrollers, and processors) that infringe one or more claims of the Asserted Patents in the United States; (D) soliciting U.S. agents or distributors for imported Accused Products and components thereof (such as, for example, various low-noise amplifiers, power amplifiers, filters, duplexers, triplexers, multiplexers, attenuators, power detectors, microcontrollers, and processors) that infringe one or more claims of the Asserted Patents; and (E) aiding or abetting other entities in the importation, sale for importation, sale after importation, transfer, or distribution of the Accused Products and components thereof (such as, for example, various low-noise amplifiers, power amplifiers, filters, duplexers, triplexers, multiplexers, attenuators, power detectors, microcontrollers, and processors) that infringe one or more claims of the Asserted Patents.

19. Complainant also seeks imposition of a bond during the 60-day Presidential review period to prevent further injury to Complainant's domestic industry relating to the Asserted Patents.

20. Complainant further seeks any other relief that the Commission is authorized to grant and deems appropriate.

II. **THE PARTIES**

A. **Complainant**

21. Wilson Electronics is a Delaware limited liability company with its principal place of business at 3301 E. Deseret Drive, St. George, Utah, 84790. Wilson Electronics holds all right, title, and interest to each of the Asserted Patents. Since its founding more than 20 years ago by Jim Wilson in St. George, Utah, Wilson Electronics has been a pioneer and an industry leader in developing, manufacturing, marketing, distributing, and selling cellular signal boosters for use in mobile, residential, commercial, and machine-to-machine (M2M) settings. Wilson Electronics has spent tens of millions of dollars in research and development since 2015

[REDACTED]

[REDACTED]

in improving the field of Signal Boosters resulting in the issuance and ownership of approximately 87 U.S. patents, including the Asserted Patents. As an innovator in the Signal Booster industry, Wilson Electronics has created Signal Boosters that amplify cellular signals received from a base station (also known as a cell tower, cell station, or host device) and mobile electronic devices, while detecting and mitigating oscillation, minimizing the distortion of the signals, maximizing output signals while maintaining appropriate output power levels. Wilson Electronics currently retails approximately nineteen (19) products, including the domestic industry products. Exhibit 21A, ¶ 5. The Domestic Industry Products make up more than eighty percent of Wilson's sales revenue.

22. Wilson Electronics is a leading manufacturer of Signal Boosters with approximately 250 employees in the United States in 2020 on average with a peak during seasonal highs of approximately 300 employees. Wilson Electronics is on a mission to cost effectively expand wireless network coverage to everyone, everywhere through the continued deployment of Signal Boosters.

23. In the past two decades, the proliferation of mobile electronic devices using cellular communications (e.g., mobile phones, tablets, laptops with air cards) has increased the dependence of first responders, businesses and the general public on them for communication (e.g., phone calls, texts, e-mails, emergency alerts), commerce (e.g., online shopping), and pleasure (e.g., mobile video games). The increased dependence on these mobile electronic devices has also increased the importance of having reliable cellular signal coverage between the cellular devices and base stations/cell sites.

24. Cellular signals may be attenuated or otherwise diminished for a variety of reasons, including without limitation, the cellular signals reflecting off of and traveling through

[REDACTED]

natural topology (e.g., mountains) or man-made structures (e.g., cars, buildings) and a distance between a mobile electronic device and a cell site. Wilson Electronics’ innovative Signal Boosters, which practice the Asserted Patents, play a critical role in overcoming such obstacles and assuring reliable cellular signal coverage.

25. Wilson Electronics’ products are registered with the Federal Communications Commission (“FCC”) as indicated in the table below:

Wilson Product Name	FCC ID No.
weBoost Home Room	PWO460020
weBoost Drive X	PWO460021
WilsonPro Pro 70 Plus	PWO460027
weBoost Drive Sleek	PWO460035
weBoost Home Multiroom (Generation 2)	PWO460044
weBoost Installed Home Complete (Generation 2)	PWO460045
WilsonPro Pro 1100	PWO460047
WilsonPro Enterprise 1300	PWO460049
WilsonPro Enterprise 4300	PWO460052
weBoost Drive Reach (Generation 2)	PWO460054

26. Wilson Electronics has made a significant long-term investment to develop its cellular signal booster business in the United States. Complainant is a U.S.-based company that performs almost its entire R&D, manufacturing, and management in the U.S., with virtually all of its employees in the U.S. Exhibit 21A, ¶ 8. It has dedicated considerable technical manpower; facilities in Utah and Texas; and financial resources for the invention, manufacture, and commercialization of its advanced Signal Boosters. Exhibit 21A, ¶¶ 10-34. Importantly, Complainant’s technology focuses on improving cellular signal strength and reliability, while

[REDACTED]

maximizing output signals, mitigating oscillation, minimizing the distortion of the signals, and maintaining appropriate output power levels.

27. Wilson Electronics relies on the technical expertise, creativity, and knowledge of its skilled engineering and scientific personnel and utilizes patent protection to safeguard its competitive position. Wilson Electronics has made a substantial investment in the manufacture, research, development, and engineering of Signal Boosters in its facilities in the United States, including the inventions disclosed and claimed in the Asserted Patents. Exhibit 21A, *passim*.

28. Wilson Electronics is the owner of each of the Asserted Patents. Exhibits 1A-L.

B. Respondents

29. SureCall is a corporation organized under the laws of the state of California with its principal place of business at 48346 Milmont Drive, Fremont, California 94538. Exhibit 6A, 22H. Shenzhen SureCall Communication Technology Co. Ltd. is a Chinese corporation with its principal place of business at Yangtian Rd. 72 Area, Baoan District, Shenzhen, China. Exhibit 6A. Shenzhen SureCall Communication Technology Co. Ltd. makes in China, has others make in China, exports from China into the United States, and/or imports from China certain Signal Boosters that infringe one or more claims of the Asserted Patents.

30. Respondents' infringing products ("SureCall Products"), listed in the table below, can be divided into three categories by application: vehicle, residential, and commercial and are sold through online retailers such as Amazon.com, Signalbooster.com, Signalboosters.com, Waveform.com, Ubersignal.com, surecallsignalbooster.com, BestBuy.com,

HomeDepot.com, Lowes.com, and Walmart.com. Respondents sell imported, infringing products to consumers, retail customers, and/or wholesalers within the United States.

SureCall Product Name⁴	FCC ID No.
Infringing Vehicle Products	
Digital Step Attenuator Products	
Flex2Go	RSNFLEX2GO
Fusion2Go	RSNMOBILE5 RSNFUSION2GO
Fusion2Go 2.0	RSNF2GOMINI
Fusion2Go 3.0*	RSNF2GO3
Fusion2Go 3.0 RV	RSNF2GO
Fusion2Go 3.0 Fleet	
Mobile30	RSNMOBILE-30
TriFlex2Go-A	RSNTRIFLEX-2GO-A
TriFlex2Go-T	RSNTRIFLEX-2GO-T
TriFlex2Go-V	RSNTRIFLEX-2GO-V
TriFlex-A	RSNTRIFLEX-A
TriFlex-T	RSNTRIFLEX-T
TriFlex-V	RSNTRIFLEX-V
Analog Step Attenuator Products ⁵	
Fusion2Go Max	RSNF2GO-MAX

⁴ Bolded SureCall Products with an asterisk* have been charted as representative of each category of SureCall Product.

⁵ The Analog Step Attenuator Products are not accused of infringing dependent claim 5 or independent claims 7 and 9 of the '967 Patent. In all other respects, the Fusion2Go 3.0 is representative of all Infringing Vehicle Products.

	RSNF2GO-MAXR
N-Range N-Range 2.0	RSNRANGE
FusionTREK	RSNF-TREK
Infringing Residential Products	
Enhance Tri-Flex	RSNFLEX-T
EZ 4G	RSNEZV RSNEZ4G
EZ Call	RSNEZCALL
EZBoost 3G	RSNEZBOOST
EZBoost 4G	RSNEZBOOST5
Flare	RSNDT
Flare 3.0	RSNFLARE-3
Flare DB+	RSNFLARE-DB
Flex Pro	RSNFLEXPRO
Fusion4Home 3.0*	RSNF4HOME3
Fusion Professional	RSNF4HOME
Fusion4Home	RSNFUSION4H
Home Pro-5	RSNCM-EHPRO
LTE Active Antenna (Booster)	RSNLTE-V
M2M Signal Booster	RSNM2M
SoloAi-15 M2M 4G LTE	RSNM2M-A

SoloVi-15 M2M	RSNM2M-V
M2M-V	
Infringing Commercial Products	
Dual Force	RSNDUALFORCE
Force5	RSNCM5000
Force5-50	RSNFORCE-550
Force-5 Booster	RSNFORCE-5
Force5 2.0 Industrial	RSNFORCE5-IS
Force5 2.0	RSNFORCE5S
Force5 Inline Industrial	RSNFORCE-5INLINE
Force7 Industrial	RSNFORCE-7 RSNWF-HD
Force8 Industrial*	RSNFORCE8-IND
Fusion-5 Booster	RSNFUSION-5
Fusion5s	RSNFUSION5S
Fusion5X 2.0	RSNFUSION5S-X20
Fusion5X	
Fusion7	RSNFUSION-7

31. Sample SureCall Products and their packaging are shown in Exhibits 4A through 4C and physical/photo exhibits of the SureCall Products are attached as Physical/Photo Exhibits 1A through 1C. All of the SureCall Products infringe the Asserted Patents and thus are Accused Products for purposes of this Complaint. Photo exhibits are being presented due to the

COVID-19 rules preventing submission of Physical Exhibits. Physical Exhibits will be submitted once the Secretary's office is accepting physical exhibits.

III. **THE PATENTS AT ISSUE**

32. The patents asserted in this investigation are divided into two groupings according to the invention's claimed technology: Group I - the patents controlling amplification and common direction duplexer; and Group II - the patents detecting, mitigating and/or controlling oscillation.

A. **Group I – Controlling Amplification and Common Direction Duplexer**

1. **U.S. Patent No. 7,221,967 – Enhanced Gain Selected Cell Phone Booster System**

33. The '967 Patent, entitled "Enhanced Gain Selected Cell Phone Booster," was issued to Wilson Electronics on May 22, 2007 and discloses inventions relating to, *inter alia*, the amplification of cellular signals, including cell phone output signals, including automatic gain control. A certified copy of the '967 Patent is attached to the Complaint as Exhibit 1A. U.S. Application No. 11/040,626, which issued as the '967 Patent, was filed on January 22, 2005 and claims priority as a continuation-in-part to U.S. Patent Application No. 10/940,506, filed on September 14, 2004. The '967 Patent has 9 claims including 5 independent claims. The '967 Patent expires on March 5, 2025.

34. Complainant has filed a certified electronic copy of the prosecution history for the '967 Patent as Appendix A. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '967 Patent issued as Appendix B.

[REDACTED]

[REDACTED]

2. U.S. Patent No. 7,729,669 – Processor Controlled Variable Gain Cellular Network Amplifier

35. The '669 Patent, entitled "Processor Controlled Variable Gain Cellular Network Amplifier," was issued to Wilson Electronics on June 1, 2010 and discloses additional inventions relating to, *inter alia*, amplifier systems for amplifying cellular signals by a network amplifier, including automatic gain control. A certified copy of the '669 Patent is attached to the Complaint as Exhibit 1D. U.S. Application No. 11/535,376, which issued as the '669 Patent, was filed on September 26, 2006. The '669 Patent has 10 claims including 1 independent claim. The '669 Patent expires on December 8, 2028.

36. Complainant has filed a certified electronic copy of the prosecution history for the '669 Patent as Appendix G. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '669 Patent issued as Appendix H.

3. U.S. Patent No. 7,783,318 – Cellular Network Amplifier With Automated Output Power Control

37. The '318 Patent, entitled "Cellular Network Amplifier With Automated Output Power Control," was issued to Wilson Electronics on August 24, 2010 and discloses inventions relating to, *inter alia*, amplifier systems for amplifying cellular signals by a network amplifier, including automatic gain control. A certified copy of the '318 Patent is attached to the Complaint as Exhibit 1E. U.S. Application No. 11/777,770 which issued as the '318 Patent, was filed on July 13, 2007 and claims priority as a continuation-in-part to U.S. Patent Application No. 11/535,376, filed on September 26, 2006, now U.S. Patent No. 7,729,669. The '318 Patent has 9 claims including 3 independent claims. The '318 Patent expires on January 3, 2028.

[REDACTED]

38. Complainant has filed a certified electronic copy of the prosecution history for the '318 Patent as Appendix I. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '318 Patent issued as Appendix J.

4. U.S. Patent No. 8,583,033 – Oscillation Protected Amplifier with Base Station Overload and Noise Floor Protection

39. The '033 Patent, entitled “Oscillation Protected Amplifier with Base Station Overload And Noise Floor Protection,” was issued to Wilson Electronics on November 12, 2013 and discloses inventions relating to, *inter alia*, methods for setting the gain of an amplifier system while reducing any accompanying increased noise floor, power overload, and signal distortion that may be associated with using amplifiers, and minimizing or mitigating oscillation. A certified copy of the '033 Patent is attached to the Complaint as Exhibit 1F. U.S. Application No. 13/040,125 which issued as the '033 Patent, was filed on March 3, 2011 and claims priority to provision U.S. Application No. 61/310,988, filed on March 5, 2010. The '033 Patent has 23 claims including 4 independent claims. The '033 Patent expires on March 3, 2031.

40. Complainant has filed a certified electronic copy of the prosecution history for the '033 Patent as Appendix K. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '033 Patent issued as Appendix L.

5. U.S. Patent No. 8,755,399 – Common-Direction Duplexer

41. The '399 Patent, entitled “Common-Direction Duplexer,” was issued to Wilson Electronics on June 17, 2014 and discloses an invention relating to, *inter alia*, a common-direction duplexer configured to pass the uplink frequencies for Bands 12 and 13 of the 700 MHz 3GPP standard. A copy of the '399 Patent is attached to the Complaint as Exhibit 1I. U.S.

Application No. 13/837,125 which issued as the '399 Patent, was filed on March 15, 2013. The '399 Patent has 12 claims including 3 independent claims. The '399 Patent expires on March 15, 2033. A certified copy of the '399 Patent will be submitted by supplementation once received from the U.S. Patent and Trademark Office.

42. Complainant has filed a certified electronic copy of the prosecution history for the '399 Patent as Appendix Q. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '399 Patent issued as Appendix R.

6. U.S. Patent No. 8,849,187 – Radio Frequency Amplifier Noise Reduction System

43. The '187 Patent, entitled “Radio Frequency Amplifier Noise Reduction System,” was issued to Wilson Electronics on September 30, 2014 and discloses inventions relating to, *inter alia*, reducing an effect of amplified thermal noise in a wireless network. A copy of the '187 Patent is attached to the Complaint as Exhibit 1J. U.S. Application No. 13/592,079, which issued as the '187 Patent, was filed on August 22, 2012 and claims priority to provisional U.S. Application No. 61/526,448. The '187 Patent has 4 claims. The '187 Patent expires on August 22, 2032. A certified copy of the '187 Patent will be submitted by supplementation once received from the U.S. Patent and Trademark Office.

44. Complainant has filed a certified electronic copy of the prosecution history for the '187 Patent as Appendix S. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '187 Patent issued as Appendix T.

[REDACTED]

[REDACTED]

B. Group II – Detecting, Mitigating and/or Controlling Oscillation

1. U.S. Patent No. 7,409,186 – Detection and Elimination of Oscillation within Cellular Network Amplifiers

45. The '186 Patent, entitled "Detection and Elimination of Oscillation within Cellular Network Amplifiers," was issued to Wilson Electronics on August 5, 2008 and discloses additional inventions relating to, *inter alia*, amplifier systems for amplifying cellular signals while mitigating oscillation. A certified copy of the '186 Patent is attached to the Complaint as Exhibit 1B. U.S. Application No. 11/457,406 which issued as the '186 Patent, was filed on July 13, 2006. The '186 Patent has 10 claims including 2 independent claims. The '186 Patent expires on December 21, 2026.

46. Complainant has filed a certified electronic copy of the prosecution history for the '186 Patent as Appendix C. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '186 Patent issued as Appendix D.

2. U.S. Patent No. 7,486,929 – Processor-Controlled Variable Gain Cellular Network Amplifiers with Oscillation Detection Circuit

47. The '929 Patent, entitled "Processor-Controlled Variable Gain Cellular Network Amplifiers With Oscillation Detection Circuit," was issued to Wilson Electronics on February 3, 2009 and discloses additional inventions relating to, *inter alia*, detection and mitigation of oscillation in a network amplifier. A certified copy of the '929 Patent is attached to the Complaint as Exhibit 1C. U.S. Application No. 11/457,384, which issued as the '929 Patent, was filed on July 13, 2006. The '929 Patent has 16 claims including 2 independent claims. The '929 Patent expires on April 12, 2027.

[REDACTED]

48. Complainant has filed a certified electronic copy of the prosecution history for the '929 Patent as Appendix E. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '929 Patent issued as Appendix F.

3. U.S. Patent No. 8,583,034 – Verifying and Mitigating Oscillation In Amplifiers

49. The '034 Patent, entitled “Verifying and Mitigating Oscillation In Amplifiers,” was issued to Wilson Electronics on November 12, 2013 and discloses inventions relating to, *inter alia*, methods for the detection and mitigation of oscillation in a booster amplifier. A copy of the '034 Patent is attached to the Complaint as Exhibit 1G. U.S. Application No. 13/837,716, which issued as the '034 Patent, was filed on March 15, 2013 and claims priority as a continuation-in-part of U.S. Application No. 13/593,246, filed on August 23, 2012, now U.S. Patent No. 8,874,029, which is a continuation-in-part of U.S. Application No. 13/439,148, filed on April 4, 2012, now U.S. Patent No. 13/439,148. The '034 Patent has 20 claims including 2 independent claims. The '034 Patent expires on April 4, 2032. A certified copy of the '034 Patent will be submitted by supplementation once received from the U.S. Patent and Trademark Office.

50. Complainant has filed a certified electronic copy of the prosecution history for the '034 Patent as Appendix M. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '034 Patent issued as Appendix N.

4. U.S. Patent No. 8,639,180 – Verifying and Mitigating Oscillation In Amplifiers

51. The '180 Patent, entitled “Verifying And Mitigating Oscillation In Amplifiers,” was issued to Wilson Electronics on January 28, 2014 and discloses additional

[REDACTED]

inventions relating to, *inter alia*, methods for determining the detection and mitigation of oscillation in a booster amplifier. A copy of the '180 Patent is attached to the Complaint as Exhibit 1H. U.S. Application No. 13/837,788 which issued as the '180 Patent, was filed on March 15, 2013 and claims priority as a continuation-in-part to U.S. Patent Application No. 13/593,246, filed on August 23, 2012, now U.S. Patent No. 8,874,029, which is a continuation-in-part of U.S. Application No. 13/439,148, filed April 4, 2012, now U.S. Patent No. 8,874,030. The '180 Patent has 20 claims including 3 independent claims. The '180 Patent expires on April 4, 2032. A certified copy of the '180 Patent will be submitted by supplementation once received from the U.S. Patent and Trademark Office.

52. Complainant has filed a certified electronic copy of the prosecution history for the '180 Patent as Appendix O. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '180 Patent issued as Appendix P.

5. U.S. Patent No. 8,874,029 – Verifying Oscillation in Amplifiers and the Mitigation Thereof

53. The '029 Patent, entitled “Verifying Oscillation in Amplifiers and the Mitigation Thereof,” was issued to Wilson Electronics on October 28, 2014 and discloses inventions relating to, *inter alia*, methods for the detection and mitigation of oscillation in a booster amplifier. A copy of the '029 Patent is attached to the Complaint as Exhibit 1K. U.S. Application No. 13/593,246, which issued as the '029 Patent, was filed on August 23, 2012 and claims priority as a continuation-in-part of U.S. Application No. 13/439,148, filed on April 4, 2012, now U.S. Patent No. 8,874,030. The '029 Patent has 20 claims including 4 independent claims. The '029 Patent expires on May 2, 2032. A certified copy of the '029 Patent will be submitted by supplementation once received from the U.S. Patent and Trademark Office.



54. Complainant has filed a certified electronic copy of the prosecution history for the '029 Patent as Appendix U. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '029 Patent issued as Appendix V.

6. U.S. Patent No. 8,874,030 – Oscillation Detection and Oscillation Mitigation in Amplifiers

55. The '030 Patent, entitled “Oscillation Detection And Oscillation Mitigation In Amplifiers,” was issued to Wilson Electronics on October 28, 2014 and discloses inventions relating to, *inter alia*, methods for the detection and mitigation of oscillation. A certified copy of the '030 Patent is attached to the Complaint as Exhibit 1L. U.S. Application No. 13/439,148, which issued as the '030 Patent, was filed on April 4, 2012 and claims priority to provisional U.S. Application No. 61/526,452, filed on August 23, 2011. The '030 Patent has 24 claims including 3 independent claims. The '030 Patent expires on April 4, 2032.

56. Complainant has filed a certified electronic copy of the prosecution history for the '030 Patent as Appendix W. Complainant has filed an electronic copy of each patent and technical reference identified in the prosecution history of the application from which the '030 Patent issued as Appendix X.

C. Foreign Counterparts

57. The Asserted Patents have corresponding foreign patents or patent applications as detailed below. No other applications have been rejected, abandoned, or remain pending.

U.S. Patent Number	Corresponding Foreign Patent or Patent Application
7,221,967	None

7,409,186	Canada: 2566784
7,486,929	Canada: 2566642
7,729,669	Canada: 2566644
7,783,318	Canada: 2607144
8,583,033	Canada: 2733306
8,583,034	None
8,639,180	None
8,755,399	None
8,849,187	Canada: 2858985 Indonesia: P00201401701 Malaysia: P1 2014000479
8,874,029	None

D. Licensees

58. The Asserted Patents are licensed to Signifi Mobile, Inc. and SolidRF Technology, Inc., companies that sell Signal Boosters, supplying the same market as SureCall and Wilson. A full list of licensees is attached as Exhibit 3A.

E. Non-Technical Description of the Patented Technologies⁶

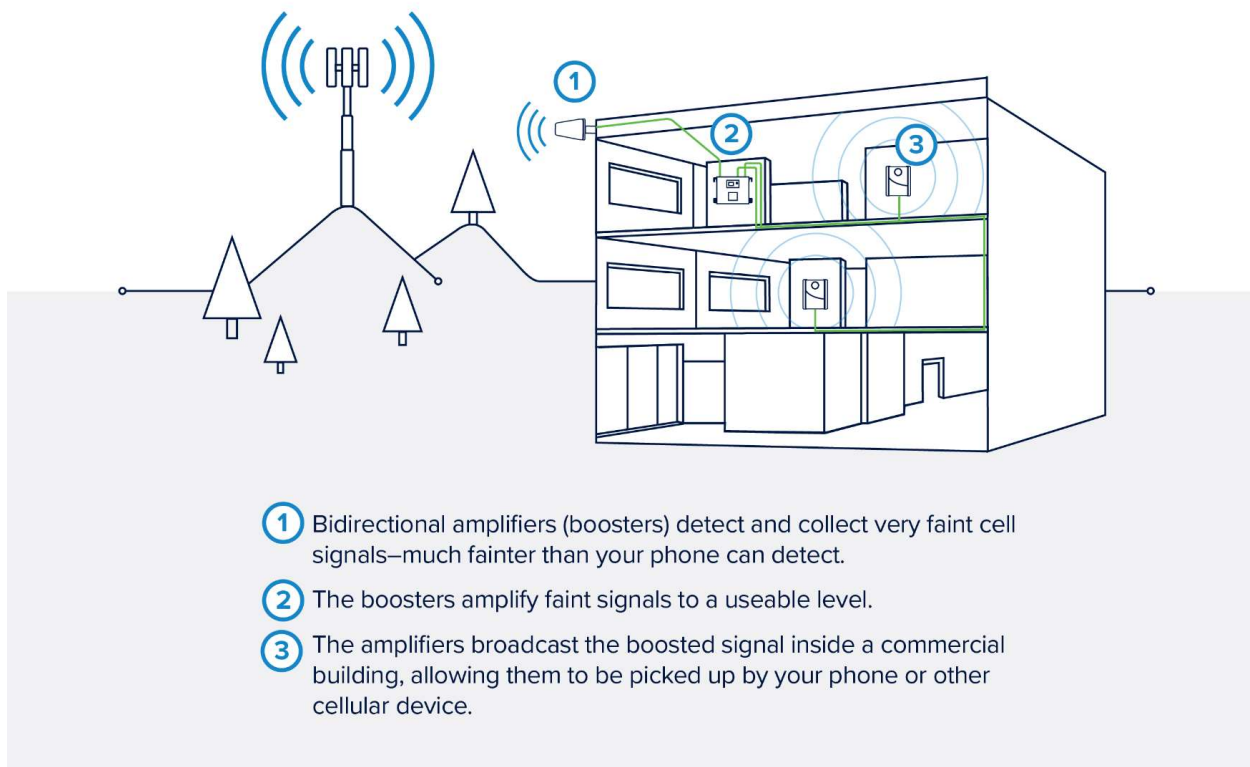
59. The Asserted Patents all relate to Signal Boosters that improve cellular coverage and reliability.

60. Wilsons Electronics' patents generally cover technology that is designed to amplify signals between mobile electronic devices and base stations/cell site to provide

⁶ This Complaint and the non-technical descriptions of the patented technology are not intended to, and do not, construe, limit, or otherwise define the scope of the patented inventions as recited in the claims of the Asserted Patents.

consistent connections between base stations and the mobile electronic devices. The technology enables amplifying both the signal received from a mobile electronic device that is then transmitted by the Signal Booster to a base station (a/k/a the uplink path), as well as amplifying the signal received from the base station that is then transmitted by the Signal Booster to the mobile electronic device (a/k/a the downlink path). This is also known as bi-directional amplification, as shown in the image below.

How it Works



61. Ubiquitous use of mobile electronic devices using cellular communications has increased the importance of having reliable cellular signal coverage between devices and base stations/cell sites. Wilson Electronics has been a pioneer in developing technologies that amplify the signal between mobile electronic devices and base stations/cell sites. In developing advanced products for boosting cellular signals, Wilson Electronics has focused on

improving frequency signal strength and reliability, including maximizing output power levels within government and industry limits, while detecting and mitigating oscillation and reducing the effects of amplified thermal noise.

62. The Wilson Patents provide methods and systems for improving cellular signal amplification and mitigating undesirable side effects that accompany radio frequency amplification systems.

63. Pursuant to Commission Rule 210.12(9)(vi), a non-technical description of each Asserted Patent is provided in the table below:

Patent Number	Name	Non-Technical Description
Group I -- Controlling Amplification and Common Direction Duplexer		
U.S. Patent No. 7,221,967 ("the '967 Patent")	Enhanced Gain Selected Cell Phone Booster	Control linear gain by adjusting attenuation levels
U.S. Patent No. 7,729,669 ("the '669 Patent")	Processor Controlled Variable Gain Cellular Network Amplifier	Using the power level of the downlink signal to ensure the uplink signal has sufficient power to reach a base station
U.S. Patent No. 7,783,318 ("the '318 Patent") ('669 family)	Cellular Network Amplifier with Automated Output Power Control	Independently controlling the amplification of the uplink and downlink signal while allowing the uplink gain limit to exceed the downlink gain limit
U.S. Patent No. 8,583,033 ("the '033 Patent")	Oscillation Protected Amplifier with Base Station Overload and Noise Floor Protection	Using three gain limits to determine a gain of the amplifier, including gain limits to reduce oscillation, and limiting an increase in the base station's noise floor
U.S. Patent No. 8,755,399 ("the '399 Patent")	Common-Direction Duplexer	Common-direction duplexer configured to pass first and second uplink frequency ranges and filter out all other frequency ranges,

		including a third downlink frequency range.
U.S. Patent No. 8,849,187 (“the ’187 Patent”)	Radio Frequency Amplifier Noise Reduction System	A booster that reduces an effect of thermal noise by determining whether a data signal is present at an input to the booster.
Group II - Detecting, Mitigating and/or Controlling Oscillation		
U.S. Patent No. 7,409,186 (“the ’186 Patent”)	Detection and Elimination of Oscillation within Cellular Network Amplifiers	Detecting and reducing oscillation by comparing two signal levels and reducing one of two amplification factors based upon the comparison
U.S. Patent No. 7,486,929 (“the ’929 Patent”)	Processor-Controlled Variable Gain Cellular Network Amplifiers with Oscillation Detection Circuit	Analyzing uplink and downlink signals to detect oscillation, and reducing the gain of uplink and downlink signals if oscillation is detected to substantially reduce oscillation, while ensuring sufficient power to transmit.
U.S. Patent No. 8,583,034 (“the ’034 Patent”) (‘030 Family)	Verifying and Mitigating Oscillation In Amplifiers	Detecting oscillations by taking a plurality of samples of the power of a wireless signal in an amplifier over a period of time, determining a power ratio of the signal and comparing it to threshold, and if oscillation is indicated, sampling the wireless signal after reducing the amplification factor.
U.S. Patent No. 8,639,180 (“the ’180 Patent”) (‘030 Family)	Verifying and Mitigating Oscillation in Amplifiers	Amplifying a wireless signal by an amplification factor and checking for oscillation, if oscillating reduce amplification by a first amount and if not oscillating reducing amplification by a different amount.
U.S. Patent No. 8,874,029 (“the ’029 Patent”) (‘030 Family)	Verifying Oscillation in Amplifiers and the Mitigation Thereof	Determining if an amplifier is self-oscillating based on a signal

		power ratio being below a threshold.
U.S. Patent No. 8,874,030 (“the ‘030 Patent”)	Oscillation Detection and Oscillation Mitigation in Amplifiers	Controlling parasitic oscillation in an amplifier by determining a signal ratio, whether a parasitic oscillation is occurring and mitigating the parasitic oscillation

64. Complainant recognizes that the Asserted Patents represent a large number of patents for a Section 337 investigation and that the “Commission may determine to institute multiple investigations based on a single complaint where necessary to allow efficient adjudication.” Commission Rule 210.10(a)(6). The efficient adjudication of all twelve (12) asserted patent could be accomplished in one investigation because (1) the Asserted Patents all relate to the same signal booster technology present in both the Domestic Industry Products and the Accused Products, (2) the Asserted Patents involve similar claim terms (e.g., amplifier, attenuator, measure or sample, controller or control circuit, power ratio, amplification factor, oscillation, and gain and (3) four of the Asserted Patents are in the same ‘030 patent family and two of the patents are in the same ‘669 family, leaving eight (8) patent families with much commonality across patent families. If the Commission determines that the Asserted Patents should be split into multiple investigations, we have grouped the Asserted Patents into two logical groupings, which are further described in the Table in paragraph 63 above:

- a) Group I – Controlling Amplification and Common Direction Duplexer – consisting of the ‘967, ‘669, ‘318, ‘033, ‘187, and ‘399 patents;
- b) Group II – Detecting, Mitigating and/or Controlling Oscillation – consisting of the ‘186, ‘929, ‘030, ‘029, ‘034, and ‘180 patents.

[REDACTED]

[REDACTED]

IV. **THE PRODUCTS AT ISSUE**

A. **Complainant's Products**

65. Wilson Electronics currently manufactures and sells in the United States at least ten (10) representative Signal Boosters that practice the Asserted Patents: weBoost Installed Home Complete (Generation 2), weBoost Home Multiroom (Generation 2), weBoost Home Room, weBoost Drive Reach, weBoost Drive X, weBoost Drive Sleek, WilsonPro Enterprise 4300, WilsonPro Enterprise 1300, WilsonPro Pro 1100, WilsonPro Pro 70 Plus (the "Domestic Industry Products"). Exhibits 11A-L to 20A-L. The Domestic Industry Products are generally representative in terms of operation, technology and design of other Wilson Electronics' products, including at least the following: weBoost Drive 3G, weBoost Connect 4G, weBoost eqo, WilsonPro Enterprise 4300 R, WilsonPro Enterprise 1300R, WilsonPro Pro 1000, WilsonPro Pro 1050, WilsonPro Pro 4000, WilsonPro Pro IoT 2-Band, WilsonPro Pro IoT 5-Band. Wilson manufactures other products that practice the Asserted Patents.

66. The Wilson Electronics products that are representative of the Domestic Industry Products are Signal Boosters that amplify cellular signals received to and from a base station/cell site while minimizing the distortion of the signals, maintaining the appropriate output power level, and reducing any accompanying increased noise floor, power overload, oscillation, and signal distortion that may be associated with using amplifiers, using technology covered by the Asserted Patents. The Domestic Industry Products include bi-directional 5 band boosters that amplify cellular signals. One side of the booster includes an antenna that receives a cellular signal from a cellular mobile electronic device while another side of the booster communicates with a base station/cell site via another antenna. The boosters transmit and amplify the uplink and downlink signals for Bands 2, 4, 5, 12, 13, 17, and 25 (*i.e.*, for AMPS, AWS, LTE, and PCS). The boosters have no modulation circuitry. Instead, they are linear amplifiers in both the uplink and

[REDACTED]

[REDACTED]

the downlink directions. The modulation of the signals is determined by the base station/cell site. The boosters are designed to amplify LTE, CDMA, GSM, EDGE, HSPA, and EVDO modulated signals. While the operation of the articles are similar, the specific electrical configurations are tailored for mobile/vehicle applications, residential applications, or commercial/industrial/enterprise applications.

67. The identified Domestic Industry Products are currently, and have been historically, marked with one or more of the Asserted Patents pursuant to 35 U.S.C. § 287. *See* <https://www.wilsonelectronics.com/patents>.

B. Respondents' Infringing Products

68. Respondents are manufacturers, retailers, and/or wholesalers who make, have made, and/or have sold Signal Boosters using the Complainant's patented technology. Respondents make for import, import, and/or sell within the United States after importation the infringing SureCall Products identified in Paragraph 30.

V. UNLAWFUL AND UNFAIR ACTS OF THE RESPONDENTS

69. Respondents manufacture for importation, have others manufacture for importation, import into the United States, offer for sale, and/or sell in the United States after importation infringing Signal Boosters including, but not limited to the SureCall Products. The SureCall Products infringe the Asserted Claims as detailed in the claim charts applying the Asserted Claims to the SureCall Products, attached as Exhibits 7A-L, 8A-L, and 9A-L. The SureCall Products infringe literally or under the doctrine of equivalents, both directly and indirectly.

70. Respondents have had knowledge of the Asserted Patents at least since the service of the corresponding district court complaint in Case No. 2:17-cv-00305-DB-EJF on

April 19, 2017 and have known that the Accused Products are especially made or adapted for use in infringement of the Asserted Patents since the same date.

71. Respondents have also actively induced others to make, use, sell, offer for sale, or import into the United States infringing Signal Boosters including, but not limited to, the Accused Products.

72. The Accused Products also constitute a material part of the inventions claimed in the Asserted Patents and are not suitable for a substantial non-infringing use. Furthermore, the Accused Products are not staple articles.

VI. **SPECIFIC INSTANCES OF IMPORTATION AND SALE**

73. Each Accused Product was made, or contains infringing components that were made, outside of the United States, as marked on the Accused Products or their packaging. Exhibits 4A-I. As shown below, the representative accused vehicle and residential products were manufactured in China, and purchased from and delivered to addresses in the United States. According to SureCall, the representative accused commercial product, the Force8, has been commercially available in the United States since January 6, 2020. <https://electronics360.globalspec.com/article/14479/surecall-introduces-5g-signal-booster-at-ces-2020>; <https://blog.surecall.com/5g-commercial-cell-phone-signal-booster-available-from-surecall-force8/>.

a) **Fusion4Home Receipt**



Final Details for Order #111-3836304-3863458

[Print this page for your records.](#)

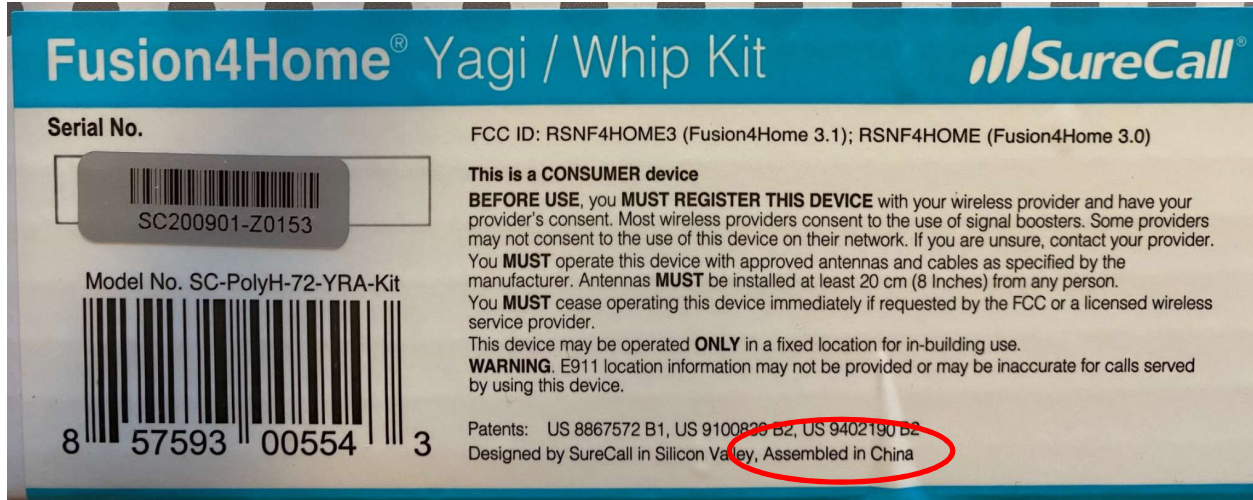
Order Placed: October 14, 2020
Amazon.com order number: 111-3836304-3863458
Order Total: \$402.79

Shipped on October 16, 2020	
Items Ordered	Price
1 of: <i>SureCall Fusion4Home Yagi/Whip, Cell Phone Signal Booster Kit for All Carriers</i> <i>3G/4G LTE up to 3,000 Sq Ft</i> Sold by: Amazon.com Services LLC	\$379.99
Condition: New	
Shipping Address: [REDACTED] ARLINGTON, VA 22205-1619 United States	
Shipping Speed: One-Day Shipping	

Payment information	
Payment Method: American Express Last digits: [REDACTED]	Item(s) Subtotal: \$379.99 Shipping & Handling: \$0.00 -----
Billing address [REDACTED] ARLINGTON, VA 22205-1619 United States	Total before tax: \$379.99 Estimated tax to be collected: \$22.80 ----- Grand Total: \$402.79
Credit Card transactions	AmericanExpress ending in [REDACTED]: October 16, 2020: \$402.79

To view the status of your order, return to [Order Summary](#).

b) Fusion4Home Label



c) **Fusion2Go Receipt**



Final Details for Order #111-0975319-1813007

[Print this page for your records.](#)

Order Placed: October 14, 2020
Amazon.com order number: 111-0975319-1813007
Order Total: \$421.41

Shipped on October 15, 2020

Items Ordered	Price
1 of: <i>SureCall Fusion2Go 3.0 Cell Phone Signal Booster for Vehicle Whole vehicle coverage for multiple devices Boosts Voice, data for 4G, LTE, 3G, Model:SC-FUSION2GO3</i> Sold by: MobAsh (seller profile) Condition: New	\$396.62

Shipping Address:

[REDACTED]
LIBERTYVILLE, IL 60048-1856
United States

Shipping Speed:

One-Day Shipping

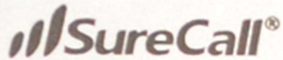
Payment information

Payment Method: American Express Last digits: [REDACTED]	Item(s) Subtotal: \$396.62 Shipping & Handling: \$0.00 -----
Billing address [REDACTED] ARLINGTON, VA 22205-1619 United States	Total before tax: \$396.62 Estimated tax to be collected: \$24.79 ----- Grand Total: \$421.41

Credit Card transactions AmericanExpress ending in [REDACTED] October 15, 2020: \$421.41

To view the status of your order, return to [Order Summary](#).

d) **Fusion2Go Label**



FUSION2GO™ 3.0 FCC ID: RSNF2GO3

FUSION2GO™ 3.0 CA IC : 7784A-F2GO3

Patent No. US 8867572 B1, US 9100839 B2, US 9402190 B2

This is a CONSUMER device

BEFORE USE, you **MUST REGISTER THIS DEVICE** with your wireless provider and have your provider's consent. Most wireless providers consent to the use of signal boosters. Some providers may not consent to the use of this device on their network. If you are unsure, contact your provider. In Canada, **BEFORE USE**, you must meet all requirements set out in CPC-2-1-05.

You **MUST** operate this device with approved antennas and cables as specified by the manufacturer. Antennas **MUST** be installed at least 20 cm (8 inches) from (i.e., **MUST NOT** be installed within 20 cm of) any person.

You **MUST** cease operation of this device immediately if requested by FCC (ISED in Canada) or a licensed wireless service provider.

WARNING: E911 location information may not be provided or may be inaccurate for calls served by using this device.

Ce produit est un appareil de CONSOMMATION

AVANT DE L'UTILISER, vous **DEVEZ ENREGISTRER CE DISPOSITIF** auprès de votre fournisseur de services cellulaires et obtenir son consentement. La plupart des fournisseurs de services cellulaires autorisent l'utilisation d'amplificateurs de signal. Il se peut que certains fournisseurs n'autorisent pas l'utilisation de ce dispositif sur leur réseau. Si vous n'êtes pas sûr, contactez-le. Au Canada, **AVANT DE L'UTILISER**, vous être conforme à toutes les exigences établies dans la CPC-2-1-05.

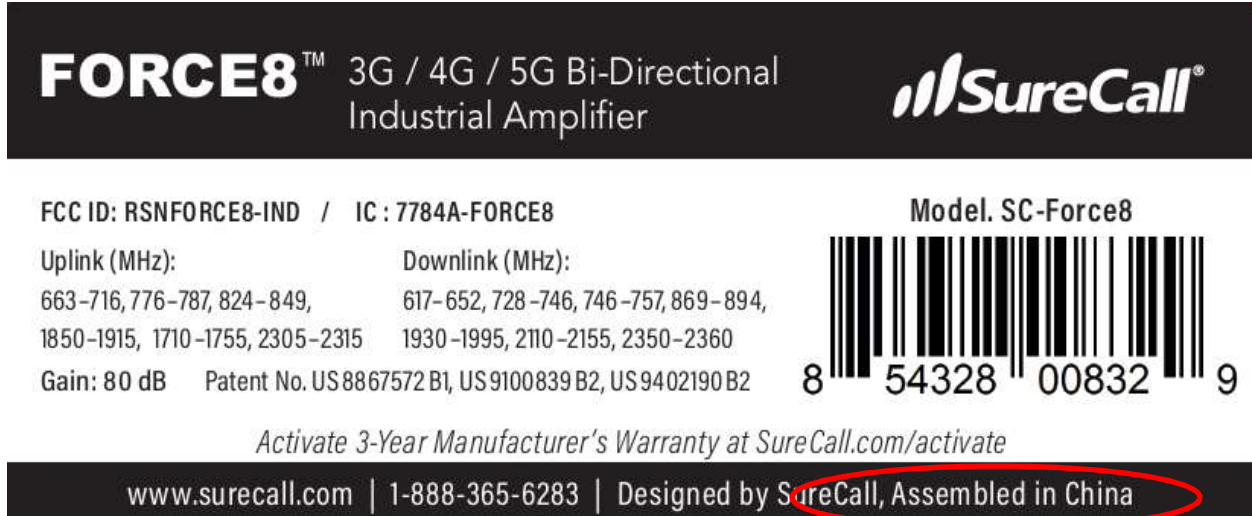
Vous **DEVEZ** utiliser ce dispositif avec les antennes et les câbles autorisés, tel que le spécifie le fabricant. Les antennes **DOIVENT** être installées à au moins 20 cm (8 po) (**NE DOIVENT PAS** être installées à moins de 20 cm) de toute personne avoisinante.

Vous **DEVEZ** arrêter cet appareil immédiatement à la demande de la FCC (ISED au Canada) ou de tout fournisseur de services cellulaires autorisé.

AVERTISSEMENT : Les renseignements relatifs à l'emplacement du service E911 pourraient être non fournis ou inexacts pour les appels effectués au moyen de cet appareil.

Designed by SureCall in Silicon Valley / **Assembled in China** / www.surecall.com

e) Force8 Label



WARNING: This is NOT a CONSUMER device.

It is designed for installation by **FCC LICENSEES** and **QUALIFIED INSTALLERS**. You **MUST** have an **FCC LICENSE** or express consent of an FCC Licensee to operate this device. Unauthorized use may result in significant forfeiture penalties, including penalties in excess of \$100,000 for each continuing violation.

WARNING: This is NOT a CONSUMER device. It is designed for installation by an installer approved by an ISED licensee. You **MUST** have an ISED LICENCE or the express consent of an ISED licensee to operate this device.

AVERTISSEMENT : Ce produit N'EST PAS un appareil de CONSOMMATION. Il est conçu pour être installé par un installateur approuvé par un titulaire de licence d'ISDE. Pour utiliser cet appareil, vous **DEVEZ** détenir une LICENCE d'ISDE ou avoir obtenu le consentement exprès d'un titulaire de licence autorisé par ISDE.

74. The SureCall Fusion4Home Yagi/Whip Cell Phone Signal Booster Kit and SureCall Fusion2Go 3.0 Cell Phone Booster for Vehicle were purchased from Amazon.com on October 14, 2020 and were delivered to and received in the United States. Exhibit 6B-C.

75. According to public FCC filings, the Force8 product was imported into the United States for testing at CKC Laboratories, Inc., 1120 Fulton Place, Fremont, California. Exhibit 6D.

76. Customs records show that Respondent Cellphone-Mate, Inc. d/b/a SureCall has imported into the United States large volumes of products from China manufactured by Shenzhen SureCall, which are described as CELLULAR PHONE SIGNAL AMPLIFIER ANTENNA products and categorized under HTS numbers 8517.70.00 and 8517.62.00, and that

[REDACTED]

such products continued to be imported from 2015 through the time of this Complaint. Exhibit 6A. Complainant expects that discovery will show that such products include the Accused Products.

VII. **CLASSIFICATION OF THE INFRINGING PRODUCTS UNDER THE HARMONIZED TARIFF SCHEDULE OF THE UNITED STATES.**

77. The Accused Products are believed to fall within at least one or more of the following classifications of the harmonized tariff schedules (“HTS”) of the United States: 8517.70.00 and 8517.62.00. These classifications are intended for illustrative purposes only and are not intended to restrict the scope or type of product accused of infringing the Asserted Patents.

VIII. **RELATED LITIGATION**

78. Wilson Electronics filed a complaint in the U.S. District Court for the District of Utah on April 19, 2017, styled as *Wilson Electronics, LLC et al. v. Cellphone-Mate, Inc. d/b/a SureCall et al.*, No. 2:17-cv-00305-DB-EJF, and a Second Amended Complaint in the same case on September 30, 2019, accusing SureCall of infringing the Asserted Patents (the “*Wilson v. SureCall* District Court case”). No trial date has been set in the *Wilson v. SureCall* District Court case. Currently, fact discovery is scheduled to close on July 17, 2021 and claim construction briefing and the submission of a Joint Claim Construction Chart is to be completed by September 27, 2021. No date for the Claim Construction Hearing has been set. The *Wilson v. SureCall* District Court case was pending before Judge Dee Benson, who passed away on November 29, 2020, and the case was reassigned to Judge Jill Parrish on December 10, 2020.

IX. **DOMESTIC INDUSTRY**

79. A domestic industry exists within the United States as defined by 19 U.S.C. §§1337(a)(3)(A)-(C) relating to significant investments in plant and equipment, significant employment of labor and capital, and significant investment in the exploitation of the Asserted Patents, including engineering and development of domestic industry products. The identified

[REDACTED]

domestic industry products covered by the Asserted Patents include the domestic industry of Complainant.

A. Technical Prong

80. Wilson Electronics has established a domestic industry by utilizing Signal Boosters using at least one embodiment of the invention as claimed in the Asserted Patents. Complainant has attached claim charts detailing how its products practice the Asserted Patents. Exhibits 11A-L through 20A-L.

B. Economic Prong

81. Wilson Electronics has made and is continuing to make substantial investments in plants and equipment, labor and capital, research and development, licensing, and exploitation of the Asserted Patents and products manufactured utilizing the technology claimed in the Asserted Patents. Exhibit 21A, Domestic Industry Declaration of Joel Johnson, Vice President of Finance for Wilson Electronics.

82. Specifically, Wilson Electronics has made significant investments to operate offices, research and development, and manufacturing facilities in Texas and Utah. Exhibit 21A, ¶¶ 10-34. In its St. George, Utah facilities, Complainant operates approximately [REDACTED] square feet of facility space over three buildings, which includes Wilson Electronics' manufacturing, warehousing, customer support, human resources, purchasing, and portions of its engineering department. Exhibit 21A, ¶¶ 12, 14, 15. All of Wilson Electronics' manufacturing for the domestic industry products is currently located within the United States. Exhibit 21A, ¶ 12. In its Cottonwood Heights, Utah facilities, Complainant operates [REDACTED] square feet of facility space, which includes Wilson Electronics' headquarters, sales, marketing, and administration. Exhibit 21A, ¶ 11. In its Richardson, Texas facility, Complainant operates

[REDACTED]
[REDACTED]
[REDACTED] square feet of facility space, which includes portions of Wilson Electronics' engineering department. Exhibit 21A, ¶ 13. From January 1, 2015 through October 31, 2020, Complainant also invested approximately [REDACTED] for equipment, machinery, and manufacturing and office space. Exhibit 21A, ¶¶ 16-17.

83. Wilson Electronics has invested significant resources in the U.S. in labor and capital as well. Personnel costs from 2015 through October 2020 have totaled [REDACTED]. Exhibit 21A, ¶ 23. Since 2015, Wilson Electronics has employed, on average, approximately the following number of personnel in the U.S.: [REDACTED]. Exhibit 21A, ¶ 22. Through Oct. 31, 2020, Wilson Electronics employed, on average, [REDACTED] people in the U.S. *Id.* Wilson Electronics' expenditure in the cost of goods sold in the U.S. in support of its domestic industry from January 2015 through Oct. 31, 2020 was [REDACTED]. Exhibit 21A, ¶¶ 28-29.

84. Complainant has invested in the development and exploitation of the patented technology continuously since the Asserted Patents, were filed. Since 2015 through Oct. 31, 2020, Wilson Electronics invested [REDACTED] for the research, development, and commercialization of the patented technology including the products identified in Exhibits 5A-J. Exhibit 21A, ¶ 31-32. From 2015 through Oct. 31, 2020, Wilson Electronics has also [REDACTED] in sales and marketing expenses to support the business related to its Signal Boosters. Exhibit 21A, ¶¶ 26-27.

85. Complainant has invested in its licensing efforts since the Asserted Patents were filed. Since 2015 through Oct. 31, 2020, Wilson Electronics invested [REDACTED] for its licensing efforts for the patented technology. Exhibit 21A, ¶¶ 33-34

[REDACTED]

86. Complainant has had [REDACTED] in worldwide revenue since 2015 on sales of the domestic industry products. Exhibit 21A, ¶ 7. Approximately [REDACTED] or more of the revenue was for sales in the U.S. during that time period. Exhibit 21A, ¶7.

X. **RELIEF REQUESTED**

87. WHEREFORE, by reason of the forgoing, Complainant respectfully requests that the United States International Trade Commission:

a) institute an investigation pursuant to Section 337(b)(1) of the Tariff Act of 1930 (19 U.S.C. § 1337(b)(1)) into the violations by Respondents of Section 337 arising from the unlawful importation into the United States, sale for importation, and/or sale within the United States after importation of Signal Boosters that infringe one or more of the Asserted Claims of the Asserted Patents;

b) schedule and conduct a hearing pursuant to Section 337 for purposes of receiving evidence and hearing argument whether there has been a violation of Section 337, and, following the hearing, determine that there has been a violation of Section 337, as amended;

c) issue a limited exclusion order pursuant to 19 U.S.C. §1337(d)(1) excluding from entry for consumption into the United States, entry for consumption from a foreign trade-zone, or withdrawal from a warehouse for consumption, certain Signal Boosters that infringe one or more claims of the Asserted Patents and which are manufactured by or on behalf of, or imported by or on behalf of Respondents, or any of its affiliated companies, parents, subsidiaries, or other related business entities, or its successors or assigns, for the remaining terms of the Asserted Patents, except under license of Complainant or as provided by law;

[REDACTED]

[REDACTED]

d) issue a permanent cease-and-desist order pursuant to 19 U.S.C. §1337(f) directing Respondents and any of its principals, stockholders, officers, directors, employees, agents, licensees, distributors, controlled (whether by stock ownership or otherwise) or majority-owned business entities, successors, and assigns, to cease and desist from either directly engaging in or for, with, or otherwise on behalf of Respondents, (A) importing or selling for importation into the United States certain Signal Boosters that infringe one or more claims of the Asserted Patents; (B) marketing, distributing, offering for sale, selling, or otherwise transferring, in the United States certain imported Signal Boosters that infringe one or more claims of the Asserted Patents; (C) advertising certain imported Signal Boosters in the United States that infringe one or more claims of the Asserted Patents; (D) soliciting U.S. agents or distributors for certain imported Signal Boosters that infringe one or more claims of the Asserted Patents; or (E) aiding or abetting other entities in the importation, sale for importation, sale after importation, transfer, or distribution of certain Signal Boosters that infringe one or more claims of the Asserted Patents;

e) impose a bond during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(e)(1) and (f)(1) to prevent further injury to Complainant's domestic industry relating to the Asserted Patents; and

f) grant such other relief as the Commission deems just and proper based on the facts determined by the investigation.

Dated: January 19, 2021

Respectfully submitted,

/s/ Kirk R. Ruthenberg

Kirk R. Ruthenberg
Nicholas H. Jackson
Orrin J. Neitzke
DENTONS US LLP
1900 K Street, N.W.
Washington, DC 20006-1102
Telephone: (202) 496-7500
Facsimile: (202) 496-7756

Joel Bock
DENTONS US LLP
101 JFK Parkway
Short Hills, NJ 07078-2708
Telephone: (973) 912-7100
Facsimile: (973) 912-7199

David R. Metzger
DENTONS US LLP
233 South Wacker Drive
Suite 5900
Chicago, Illinois 60606-6361
Telephone: (312) 876-8000
Facsimile: (312) 876-7934

VERIFICATION

I, Bruce Lancaster, declare under penalty of perjury and in accordance with 19 C.F.R. §§ 210.4 and 210.12(a) that the following statements are true:

1. I am Chief Executive Officer of Wilson Electronics, LLC and am duly authorized to sign this complaint on behalf of Complainant;
2. I have read the foregoing complaint;
3. I certify, to the best of my knowledge, information and belief, formed after reasonable inquiry that:
 - a. the foregoing complaint is not being presented for an improper purpose;
 - b. the claims and other legal contentions contained in the foregoing complaint are warranted by existing law;
 - c. the allegations and other factual contentions contained within the foregoing complaint have evidentiary support or, if specifically identified, are likely to have evidentiary support after a reasonable opportunity to conduct further investigation or discovery.

Date: January 19, 2021



Bruce Lancaster