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Attorneys for Plaintiffs

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 **CRBN PICKLEBALL, LLC**, a
13 California limited liability company,

14 Plaintiff,

15 vs.

17 **VATIC PRO LLC**, a California
18 limited liability company,

19 Defendants.

CASE NO.

COMPLAINT FOR PATENT
INFRINGEMENT

DEMAND FOR JURY TRIAL

1 Plaintiff CRBN PICKLEBALL, LLC (hereinafter referred to as “CRBN” or
2 “Plaintiff”) hereby complains of VATIC PRO LLC (hereinafter “Vatic” or
3 “Defendant”) and alleges as follows:

4
5 **INTRODUCTION**

6 1. Vatic is a direct competitor of CRBN and appears, at least to date, to be
7 either uninformed or unduly dismissive of the obligation to respect third-party
8 intellectual property rights. That posture is reflected in statements by Vatic’s founder,
9 Daryl Wang, who remarked in a YouTube interview: *“So, the cease and desists are*
10 *kind of normal these days. . . . Once you like kind of work in the industry you realize*
11 *that most of things that other companies send you are kind of empty threats and more*
12 *like political games rather than actual cease and desist letters that are like they are*
13 *going to send their lawyers at you and go to court.”* Consistent with that publicly
14 expressed view, and notwithstanding multiple good-faith efforts by CRBN to resolve
15 this matter without litigation, Vatic’s counsel has repeatedly minimized CRBN’s
16 infringement claims and treated them with notable indifference. Unfortunately, that
17 approach leaves little room for productive resolution and suggests that a more
18 formal—and instructive—forum may be required to convey the seriousness of
19 CRBN’s intellectual property rights and Vatic’s obligations to respect them.

20 2. This action, for patent infringement under the laws of the United States
21 of America, 35 U.S.C. § 271, *et seq.*, involves Defendant Vatic’s infringement of
22 Plaintiff CRBN’s Patent No. 12,465,827 for pickleball paddle technology.

23 3. Pickleball is a rapidly growing paddle sport played on a court with a
24 perforated plastic ball and solid-faced paddles. The sport is played recreationally and
25 competitively across the United States and internationally, driving substantial demand
26 for specialized pickleball equipment.

27 4. CRBN specializes in designing and producing high-performance
28 pickleball paddles and related gear for players of all levels. CRBN has invested time

1 and money to create a unique dual-foam core paddle. To protect its intellectual
2 property, CRBN applied for and received Patent No. 12,465,827.

3 5. When CRBN discovered that Vatic was infringing on its patented paddle
4 technology it sent several notice letters to Vatic. This reflects Vatic’s attitude of
5 patents, shared by its founder: “there most definitely isn’t anything within a paddle
6 that you can patent or have something that you own.” (*How This 25 Year Old Created*
7 *The Most Popular Paddle Vatic Pro, YouTube*, at
8 21:06, <https://www.youtube.com/watch?v=HVYWAhQO608> (last visited Dec. 15,
9 2025). Mr. Wang, and Vatic, could not be more uninformed. Unsurprisingly, Vatic’s
10 unlawful behavior persists as it continues to willfully infringe on CRBN’s patent.

11 THE PARTIES

12 6. Plaintiff CRBN Pickleball, LLC is a California limited liability company
13 with its principal place of business in Costa Mesa, California. CRBN is the owner of
14 the patent asserted herein.

15 7. Defendant Vatic Pro LLC is a California limited liability company with
16 its principal place of business in Irvine, California.

17 JURISDICTION AND VENUE

18 8. This Court has original and exclusive subject matter jurisdiction over this
19 action under 28 U.S.C. §§ 1331 and 1338(a) because CRBN’s claim for patent
20 infringement arises under the laws of the United States, 35 U.S.C. § 271, *et seq.*

21 9. This Court has personal jurisdiction over Vatic because it resides in this
22 District and has a continuous, systematic and substantial presence in this District,
23 because it regularly conducts business and/or solicits business within this District,
24 because it has committed and continues to commit patent infringement in this District,
25 including without limitation by using infringing products in this District, by
26 purposefully directing activities at residents of this District, and by placing infringing
27 products into the stream of commerce with the knowledge that such infringing
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1 products would be sold in California and this District, which acts from a substantial
2 part of the events giving rise to CRBN’s claims.

3 10. Venue is proper in this District under 28 U.S.C. § 1400(b) because Vatic
4 has a regular and established place of business in this District and has committed and
5 continues to commit acts of patent infringement in this District.

6
7 **FACTUAL BACKGROUND**

8 11. On November 11, 2025, the United States Patent and Trademark Office
9 (PTO) duly and lawfully issued United States Patent No. 12,465,827, entitled “Paddle
10 Technology” to CRBN (the “’827 Patent”). CRBN is the owner of all rights, title, and
11 interest to the ’827 Patent, and holds all substantial rights therein, including the right
12 to grant licenses, to exclude others, and to enforce and recover past damages for
13 infringement. A copy of the ’827 Patent is attached hereto as **Exhibit 1** and
14 incorporated in this Complaint by reference.

15 12. Vatic is and has been making, using, selling, offering for sale, importing
16 and/or exporting pickleball paddles that infringe the ’827 Patent, including without
17 limitation the V-SOL POWER paddle. Vatic offers its infringing pickleball paddles
18 for sale through multiple commercial channels, including its own website, third-party
19 online marketplaces (i.e. Amazon), and direct-to-consumer sales. Vatic’s products are
20 marketed to recreational players, competitive armatures, and professional athletes.

21 13. Modern pickleball paddles incorporate engineered features intended to
22 improve performance characteristics such as power, control, spin, durability,
23 vibration dampening, and player comfort. These features may include, among other
24 things, specialized paddle face materials, layered or composite core constructions,
25 edge guard designs, surface textures, weight distributions, and manufacturing
26 techniques. Manufacturers in this market invest significant resources in product
27 research and development, material selection, and engineering to differentiate their
28 paddles and gain competitive advantage.

1 claims 1, 4, 8, 9, 10, 11, 12, and 13 are found in the V-SOL POWER paddle is attached
2 hereto as **Exhibit 2**. This infringement chart is preliminarily based upon CRBN's
3 current understanding of the V-SOL POWER paddle. The chart does not set forth all
4 of CRBN's infringement theories. The V-SOL POWER paddle, and later iterations,
5 also embody other claims set forth in the '827 Patent. CRBN reserves the right to
6 amend or supplement its infringement theories upon more information becoming
7 available through, but not limited to, formal discovery and/or this Court completing
8 its claim construction proceedings.

9 20. Vatic' acts of infringement were undertaken without permission or
10 license from CRBN.

11 21. CRBN notified Vatic at least twice that it was infringing upon the '827
12 Patent. Vatic continued to directly infringe the '827 Patent. Vatic's conduct is willful
13 and deliberate infringement.

14 22. CRBN is informed and believes and based thereon alleges that Vatic's
15 infringement of the '827 Patent will continue unless enjoined by this Court.

16 23. CRBN is informed and believes and thereupon alleges that the extensive
17 scope and scale of commercial use and sale of the V-SOL POWER paddle has resulted
18 in lost sales and license fees, reduced the business and profit of CRBN, and greatly
19 injured the general reputation of CRBN, all to CRBN's damage in an amount not yet
20 fully determined. The exact amount of profits realized by Vatic as a result of its
21 infringing activities, are presently unknown to CRBN, as are the exact amount of
22 damages suffered by CRBN as a result of said activities. These profits and damages
23 cannot be accurately ascertained without an accounting.

24 24. Pursuant to 35 U.S.C. § 284, CRBN is also entitled to an increase of
25 damages up to three times the amount found or assessed due to Vatic's willful and
26 deliberate infringement.

27 25. In addition, CRBN is entitled to reasonable attorneys' fees incurred in
28 this action under 35 U.S.C. § 285.

1 26. Because of the aforesaid infringing acts, CRBN has suffered and
2 continues to suffer great and irreparable injury for which there is no adequate remedy
3 at law.

4
5 **SECOND CLAIM FOR RELIEF**

6 **(Indirect Infringement – 35 U.S.C. § 271)**

7 27. CRBN repeats, realleges, and incorporates by reference the preceding
8 allegations above as though set forth fully herein.

9 28. CRBN is informed and believes, and based thereon, alleges that Vatic
10 actively induces customers to use its V-SOL POWER paddle to its advantage, thus
11 indirectly infringing the '827 Patent.

12 29. CRBN is informed and believes, and based thereon, alleges that Vatic
13 sells or has sold the V-SOL POWER paddle to its customers, who then use the V-
14 SOL POWER paddle without authorization from CRBN.

15 30. CRBN knew, or should have known, that these actions would result in
16 its customer's infringement.

17 31. By reason of the foregoing acts of indirect infringement, CRBN has been
18 damaged, continues to be damaged, and is entitled to no less than a reasonable royalty
19 in accordance with 35 U.S.C. § 284 in an amount to be determined at trial. In addition,
20 CRBN is entitled to reasonable attorneys' fees incurred in this action under 35 U.S.C.
21 § 285.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiff CRBN PICKLEBALL, LLC, prays for judgment
24 against Defendant VATIC PRO LLC as follows:

25 (a) An order adjudging Vatic to have directly infringed the '827 Patent under
26 35 U.S.C. § 271;

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(b) That Vatic be required to account to CRBN for any and all profits derived by it associated with its use and/or sale of the V-SOL POWER paddle, and all damages sustained by CRBN by reason of Vatic’s patent infringement;

(c) For an assessment and award of patent damages against Vatic in an amount no less than lost profits or a reasonably royalty, pursuant to 5 U.S.C. § 284;

(d) For an increase of damages up to three times the amount found or assessed due to Vatic’s willful and deliberate infringement;

(e) That an award of reasonable costs, expenses, and attorneys’ fees be awarded against Vatic pursuant to 35 U.S.C. § 285;

(f) An award of pre-judgment and post-judgment interest and costs of this action against Vatic; and

(g) For such other and further relief as the Court deems just and proper.

DATED: December 17, 2025

WEEKS NELSON

/s/ Gregory K. Nelson
Gregory K. Nelson
Attorney for Plaintiff

JURY DEMAND

CRBN PICKLEBALL, LLC hereby requests a trial by jury in this matter.

DATED: December 17, 2025

WEEKS NELSON

/s/ Gregory K. Nelson
Gregory K. Nelson
Attorney for Plaintiff