

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

Duvall Espresso IP Enforcement, LLC v. Meticulous Home, Inc. and
Juan Carlos Lopez Pendas

Duvall Espresso · No. Civil Action No. 24-22-CJB · Decided March 2, 2026

SUMMARY

This memorandum opinion addresses Defendants’ motion to dismiss a patent infringement action under Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6). The court considers personal jurisdiction over an individual corporate officer, the officer’s potential personal liability for direct infringement, and the sufficiency of direct, indirect, and willful infringement allegations concerning three asserted patents. The court grants in part and denies in part the motion.

CASE DETAILS

COURT	United States District Court for the District of Delaware
WRITING FOR THE COURT	Christopher J. Burke
JURISDICTION	United States District Court for the District of Delaware
DECIDED	March 2, 2026
DOCKET	Civil Action No. 24-22-CJB
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) to dismiss the First Amended Complaint in a patent infringement action.
STANDARD OF REVIEW	For personal jurisdiction under Rule 12(b)(2), because the court held no evidentiary hearing, Plaintiff was required to make a prima facie showing of jurisdiction, with factual inferences drawn in Plaintiff’s favor. For Rule 12(b)(6), the court accepted well-pleaded factual allegations as true, disregarded legal conclusions, and assessed whether the complaint plausibly stated a claim for relief.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

TOPICS

- patent infringement
- motions to dismiss
- personal jurisdiction
- pleadings
- civil procedure

PRACTICE AREAS

patent infringement

intellectual property

civil procedure

personal jurisdiction

pleadings

QUESTIONS PRESENTED

1. Whether the First Amended Complaint plausibly alleged that Pendas could be personally liable for direct patent infringement without piercing Meticulous's corporate veil.
2. Whether the court could exercise personal jurisdiction over Pendas under Delaware's long-arm statute and the Due Process Clause.
3. Whether the First Amended Complaint plausibly alleged direct infringement based on offers for sale, making, or importing despite the absence of a commercial product launch.
4. Whether the induced-infringement allegations were sufficiently pleaded.
5. Whether the direct-infringement allegations concerning claim 1 of the '187 patent and the asserted claims of the '491 patent were plausible.
6. Whether Defendants had sufficient pre-suit knowledge of the '187 and '491 patents to support willful-infringement claims.

HOLDINGS

1. A corporate officer or owner may be personally liable for his own acts of direct patent infringement, including acts performed in a corporate capacity, without the patentee first piercing the corporate veil. The First Amended Complaint plausibly alleged that Pendas personally participated in the alleged infringement.
2. The First Amended Complaint plausibly alleged personal jurisdiction over Pendas under subsection (c) (1) of Delaware's long-arm statute, and exercising jurisdiction comported with due process.
3. A direct-infringement claim does not require an actual commercial sale or product launch. The First Amended Complaint plausibly alleged direct infringement because pre-orders with specified pricing and anticipated shipping dates could constitute commercial offers for sale, and the alleged display and transportation of accused products in the United States plausibly supported making or importing.
4. The induced-infringement claims were inadequately pleaded and were dismissed without prejudice.
5. The direct-infringement allegations concerning claim 1 of the '187 patent and the asserted claims of the '491 patent were not plausible and were dismissed without prejudice.
6. The First Amended Complaint did not plausibly establish Defendants' pre-suit knowledge of the '187 and '491 patents, so the pre-suit willful-infringement claims were dismissed without prejudice. The complaint sufficiently pleaded post-suit knowledge as to surviving claims involving claims 8 and 16 of the '187 patent.

KEY QUOTATIONS

“Corporate officers can be personally liable for their own acts of infringement, even if those acts were committed in their corporate capacity.” (Section III.A.1)

“An offer for sale under Section 271(a) “requires no more than a commercial offer for sale.”” (Section III.B.1)

“Plaintiff may file an amended complaint within 14 days.” (Section IV)

FACTUAL BACKGROUND

Duvall owns three patents concerning devices and systems for creating or brewing infused beverages. It alleged that Meticulous and its sole owner and decision maker, Juan Carlos Lopez Pendas, marketed and offered espresso machines through websites and crowdfunding platforms, including to customers in Delaware, and displayed a prototype at a United States coffee industry conference. Duvall alleged direct, indirect, and willful infringement of the three asserted patents, and alleged that Pendas personally participated in the marketing and promotion of the accused products.

PROCEDURAL HISTORY

Plaintiff originally filed the action in the Southern District of Florida on October 11, 2023. The action was transferred to the District of Delaware on January 9, 2024, after the parties agreed to the transfer. Plaintiff filed the operative First Amended Complaint on March 25, 2024, and Defendants moved to dismiss it. The court granted the motion in part and denied it in part, allowing Plaintiff 14 days to file another amended complaint as to claims dismissed without prejudice.

DISPOSITION

other

CASES CITED

- Power Integrations, Inc. v. BCD Semiconductor Corp., 547 F. Supp. 2d 365, 369 (D. Del. 2008)
- Intel Corp. v. Broadcom Corp., 167 F. Supp. 2d 692, 700 (D. Del. 2001)
- International Shoe Co. v. State of Washington, International Shoe Co. v. Washington, 326 U.S. 310, 316 (1945)
- Lubby Holdings LLC v. Chung, 11 F.4th 1355, 1358-59 (Fed. Cir. 2021)
- Orthokinetics, Inc. v. Safety Travel Chairs, Inc., 806 F.2d 1565, 1579 (Fed. Cir. 1986)
- Manville Sales Corp. v. Paramount Sys., Inc., 917 F.2d 544, 552-53 (Fed. Cir. 1990)
- Al-Site Corp. v. VSI Int'l, Inc., 174 F.3d 1308, 1331 (Fed. Cir. 1999)
- Wordtech Sys., Inc. v. Integrated Networks Sols., Inc., 609 F.3d 1308, 1313-14 (Fed. Cir. 2010)
- Donsco, Inc. v. Casper Corp., 587 F.2d 602, 606 (3d Cir. 1978)
- Vita-Mix Corp. v. Basic Holding, Inc., 581 F.3d 1317, 1328 (Fed. Cir. 2009)
- Rotec Indus., Inc. v. Mitsubishi Corp., 215 F.3d 1246, 1254-55 (Fed. Cir. 2000)
- 3D Sys., Inc. v. Aarotech Lab'ys, Inc., 160 F.3d 1373, 1378-79 (Fed. Cir. 1998)
- Disc Disease Sols. Inc. v. VGH Sols., Inc., 888 F.3d 1256, 1260 (Fed. Cir. 2018)
- Bot M8 LLC v. Sony Corp. of Am., 4 F.4th 1342, 1352-54 (Fed. Cir. 2021)

- Bench Walk Lighting LLC v. LG Innotek Co., 530 F. Supp. 3d 468, 491-92 (D. Del. 2021)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-district-of-delaware/2026/duvall-espresso-ip-enforcement-llc-v-meticulous-home-inc-vlrngyi0>