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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

<p>HIGH COUNTRY CONCEPTS, LLC, a Utah entity,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>BPS DIRECT LLC a Delaware entity dba BASS PRO SHOPS, BASS PRO OUTDOORS ONLINE LLC a Delaware entity dba BASS PRO SHOPS, WESTFIELD OUTDOOR, INC. an Indiana entity, SPORTSMAN’S DISTRIBUTION COMPANY LLC, a Missouri entity, and BASS PRO a Delaware entity dba BASS PRO SHOPS and dba SPORTSMAN’S DISTRIBUTION COMPANY.</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. _____</p> <p>Judge _____</p> <p style="text-align: center;">COMPLAINT AND JURY DEMAND</p>
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INTRODUCTION

Plaintiff, High Country Concepts, LLC by and through their attorneys, complaining of defendants BPS Direct LLC (“BPS Direct”), Bass Pro Outdoors Online LLC (“Bass Pro Online”), Westfield Outdoor, Inc. (“Westfield”), Sportsman’s Distribution Company, LLC

(“SDC”) and Bass Pro seeks judgment and other relief for patent infringement of United States Patent No. 6,553,586 caused by the importation, sale and use of the product branded as the Bass Pro Shop® Big Outdoorsman Cot.

JURISDICTION AND VENUE

1. This action arises under the patent laws of the United States. 35 U.S.C. § 1 et. seq. Jurisdiction is conferred on this Court by 28 U.S.C. §§ 1331 and 1338.

2. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400.

PARTIES

3. Plaintiff, High Country Concepts, LLC is a Utah entity organized and operating under the laws of the State of Utah with a principal place of business at 4544 Cambridge Drive, Cedar Hills, Utah 84062 (“High Country”). By assignment and agreement, High Country has all necessary legal rights to bring this action.

4. BPS Direct LLC is Delaware business entity doing business as Bass Pro Shops at www.basspro.com, having its corporate offices at 2500 E. Kearney (also known as 2300 E. Turner), Springfield, MO 65989, having a registered agent CT Corporation Systems, 120 South Central Avenue, Clayton, MO 63105 and doing business in this judicial district.

5. Bass Pro Outdoors Online LLC is Delaware business entity doing business as Bass Pro Shops at www.basspro.com, having its corporate offices at 2500 E. Kearney (also known as 2300 E. Turner), Springfield, MO 65989, having a registered agent CT Corporation Systems, 120 South Central Avenue, Clayton, MO 63105 and doing business in this judicial district.

6. Westfield Outdoors, Inc. is a Nevada corporation doing business at 8675 Purdue Rd, Indianapolis, IN and inducing business in this judicial district.

7. Sportsman's Distribution Company, LLC is a Missouri entity doing business as Bass Props and/or BPS Outdoor World and doing business at 2300 E. Turner (also known as 2500 E. Kearney), Springfield, MO and doing business in this judicial district.

8. Bass Pro a Delaware entity doing business as Bass Pro Shops, Sportsman's Distribution Company and/or BPS Outdoor World, having a place of business at business at 2500 E. Kearney (also known as 2300 E. Turner), Springfield, MO, and doing business in this judicial district.

9. BPS, Bass Pro Online, SDC, and Bass Pro are collectively referred to as "Bass Defendants." Bass Defendants and Westfield are collectively referred to as "Defendants."

GENERAL ALLEGATIONS

10. This case relates to United States Patent No. 6,553,586 ("the '586 Patent') for a folding bed frame. High Country is the owner of all rights in the '586 Patent.

11. High Country designs, develops, produces, manufactures, markets, sells and distributes folding bed frames in particular associated with camping-type cots.

12. Folding bed frames of High Country are protected by the '586 Patent.

13. High Country's business is throughout the United States, including the state of Utah and this judicial district.

14. Without authorization from High Country, Defendants in concert with one another manufacture, have manufactured, import into, sell or offer for sale and/or use in the United States a folding bed frame cot product branded Bass Pro® Shop Big Outdoorsman Cot.

15. The Bass Pro Shop® Big Outdoorsman Cot ("Infringing Cot") infringes one or more of claims 1-2 of the '586 Patent ("Asserted Claim(s)").

16. Without authorization from High Country, defendant Westfield imports and sells the Infringing Cot to one or more of the Bass Defendants thereby inducing the sale of Infringing Cots in the United States and in this judicial district.

17. Through its agent defendant Westfield, defendant Bass Pro doing business as Sportsman's Distribution Company or Bass Pro Shops and/or defendant SDC import(s) folding bed frames incorporating the inventions of the '586 Patent into the United States.

18. Bass Pro, Bass Pro Shops, BPS Direct, Bass Pro Online and/or SDC ("Bass Defendants") sell(s) and/or offer(s) for sale Infringing Cots to customers/consumers in the United States and in Utah.

19. The Bass Defendants sell Infringing Cots to customers/consumers in Utah through the interactive website www.basspro.com.

20. The Bass Defendants have an established channel of distribution, sales and delivery by which Infringing Cots are sold and shipped to customers/consumers in Utah.

21. Without authorization from High Country, Defendants have actively induced and/or are actively inducing customers and/or third parties to use Infringing Cots in the United States, including in this judicial district.

22. Defendants' conduct constitutes infringement of the '586 Patent.

23. The forgoing conduct of Defendants has caused and will continue to cause irreparable harm to High Country.

24. The conduct of Defendants is knowing and willful and will continue to be knowing and willful unless enjoined by this Court.

25. The forgoing conduct of Defendants has caused and will continue to cause harm and damage to High Country.

26. Because the conduct of Defendants has been and continues to be knowing and willful, this is a case in which Defendants should be required to pay High Country's increased damages and attorney's fees.

FIRST CLAIM FOR RELIEF

(Judgment of Direct Infringement of the '586)

27. High Country incorporates by reference paragraphs 1 through 26 of this Complaint as though set forth here in full.

28. Pursuant to patent laws of the United States, the forgoing acts of Defendants constitute direct infringement of one or more of claims 1-2 of the '586 Patent by either literal infringement or by infringement under the doctrine of equivalents.

29. High Country requests the Court to find that the acts of Defendants constitute infringement of one or more of the claims of the '586 Patent.

30. High Country requests the Court to find the direct infringement of Defendants has been willful, in bad faith and/or in reckless disregard of the rights of High Country.

31. Defendants have caused High Country monetary damage in an amount to be determined at trial.

32. Defendants have harmed High Country's rights and should be enjoined from further infringement.

SECOND CLAIM FOR RELIEF

(Judgment of Inducing Infringement of the '586 Patent)

33. High Country incorporates by reference paragraphs 1 through 32 of this Complaint as though set forth here in full.

34. Pursuant to patent laws of the United States, the forgoing acts of Defendants constitute inducing infringement of one or more of claims 1-2 of the '586 Patent.

35. High Country requests the Court to find that the acts of Defendants constitute infringement of one or more of the claims of the '586 Patent.

36. High Country requests the Court to find that the induced infringement of Defendants has been willful, in bad faith and/or in reckless disregard of the rights of High Country.

37. Defendants have caused High Country monetary damage in an amount to be determined at trial.

38. Defendants have harmed High Country's rights and should be enjoined from further infringement.

RELIEF REQUESTED

WHEREFORE, Plaintiff, High Country, prays for judgment and relief as follows:

a. Judgment in favor of High Country finding that Defendants are liable for direct infringement of the '586 Patent.

b. Judgment in favor of High Country finding that Defendants are liable for inducing infringement of the '586 Patent.

c. An accounting for and an award of any and all ascertainable damages, to be determined at trial, related to the unlawful acts of Defendants.

d. Judgment in favor of High Country that damages should be increased up to three times.

e. For temporary, preliminary and permanent injunctive relief ordering Defendants to refrain from further infringing any claims of the '586 Patent.

f. For reasonable attorney's fees, costs and interest.

g. For such further relief as the Court may deem proper.

JURY DEMAND

A demand is hereby made for trial by jury.

DATED this 10th day of June, 2014.

KIRTON & McCONKIE

By: /s/Todd E. Zenger

Todd E. Zenger

Dax D. Anderson

Attorneys for Plaintiff

HIGH COUNTRY CONCEPTS, INC.