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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

2XJ ENTERPRISES, INC.  
233 Springfield Drive  
North East, Maryland 21901

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Plaintiff

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v.

GAME TRACKER, INC  
P.O. Box 380  
Flushing, Michigan 48433

\*

Case No.:

CCB 04 CV 133

Defendant.

Serve On:

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Robert E. Eastman, II  
3476 Eastman Drive  
Flushing, Michigan 48433

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COMPLAINT

2XJ Enterprises, Inc., Plaintiff, by its undersigned counsel, alleges as follows:

Statement of Jurisdiction and Venue

1 This is an action seeking redress for patent infringement under the United States Patent Laws, 35 U.S.C. § 271, *et seq.*, for infringement of United States Letters

Patent No. 6,663,518. Exclusive jurisdiction is conferred upon this Court pursuant to 28 U.S.C. § 1338(a).

2 Venue is proper in the District of Maryland pursuant to 28 U.S.C. §§ 1391(c) and 1400(b).

Parties

3 Plaintiff, 2XJ Enterprises, Inc. is a corporation organized and existing under the laws of the State of Delaware, having its principal place of business at 233 Springfield Drive, North East, Maryland (hereinafter "2XJ Enterprises").

4 Upon information and belief, Defendant Game Tracker, Inc. is a corporation organized and existing under the laws of the State of Michigan, having a principal place of business in Flushing, Michigan (hereinafter "Game Tracker").

Count One - Patent Infringement of U.S. Patent No. 6,663,518

5 2XJ Enterprises is the owner by assignment of United States Letters Patent No. 6,663,518 Broadhead Arrowhead patent (hereinafter "the Patent"), issued by the United States Patent and Trademark Office on December 16, 2003. A copy of the '518 Patent is attached hereto as Exhibit A.

6 Upon information and belief, Game Tracker has made, used, sold and/or offered for sale and continues to make, use, sell and/or offer to sell certain broadhead arrowhead products that infringe upon the '518 Patent.

**7. The manufacture, use and/or sale of these products constitutes infringement of the '518 Patent**

**8 Game Tracker, by making, using, selling and/or offering for sale the products, has infringed the '518 Patent and has induced others to infringe the '518 Patent.**

**9. Game Tracker's infringement of the '518 Patent is willful.**

**10. Game Tracker's infringement of the '518 Patent has caused and will cause 2XJ Enterprises irreparable harm for which there is no adequate remedy at law.**

**Prayer for Relief**

**WHEREFORE, 2XJ Enterprises requests that this Court:**

- a) Enter judgment declaring that Game Tracker has infringed the '518 Patent.**
- b) Enter judgment declaring that Game Tracker has willfully infringed the '518 Patent.**
- c) Enter a permanent injunction enjoining Game Tracker and its affiliates, subsidiaries, officers, agents, employees, representatives, privies, successors, assigns and all those acting for it or on its behalf, or acting in concert with it directly or indirectly, from making, using, selling or offering for sale any goods, including the which infringe the '518 Patent**
- d) Award damages requiring Game Tracker to account for and pay to 2XJ Enterprises all damages caused by reason of Game Tracker's infringement of the '518 Patent pursuant to 35 U.S.C. § 284.**

e) Award treble damages to 2XJ Enterprises due to Game Tracker's willful infringement of the '518 Patent pursuant to 35 U.S.C. § 284.

f) Enter judgment requiring Game Tracker to file with the Court and serve upon 2XJ Enterprises' counsel within 30 days after entry of judgment in this matter a report in writing, under oath, setting forth in detail the manner and form in which Game Tracker has complied with said judgment, and the manner and form Game Tracker will employ in the future to ensure that products made, used, sold or offered for sale by Game Tracker will not infringe the '518 Patent.

g) Enter judgment pursuant to 35 U.S.C. § 285 making this case exceptional and awarding 2XJ Enterprises its attorneys' fees, costs and expenses.

h) Award such other and further relief as may be just and proper under the circumstances.



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2XJ Enterprises, Inc.