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8 Attorneys for Plaintiff Mega Distribution Int'l, Inc.

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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **WESTERN DIVISION**

14 MEGA DISTRIBUTION INT'L INC.,  
15 a California Corporation

16 Plaintiff,

17 vs.

18 WOLO MANUFACTURING CORP.,  
19 a New York Corporation;  
20 Defendant.

Case No. 2:15-cv-6802

**COMPLAINT FOR INFRINGEMENT  
OF UNITED STATES PATENT  
NOS. D614,063; and D618,572.**

**DEMAND FOR JURY TRIAL**

21 1. Plaintiff Mega Distribution Int'l, Inc., a California corporation  
22 ("Mega"), for its complaint, and demanding trial by jury under Rule 38, Fed. R. Civ.  
23 P., and Local Rule 38-1, alleges that Defendant Wolo Manufacturing Corp.  
24 ("Wolo"), a New York corporation, is infringing U.S. Design Patent D614,063 ("the  
25 '063 patent") and U.S. Design Patent D618,572 ("the '572 patent") (collectively,  
26 "the Mega patents"), by making, selling, and offering to sell, in this judicial district,  
27 lightbars that infringe the Mega patents.

28 2. This is a civil action for patent infringement and arises under, among  
other things, the United States Patent Laws, 35 U. S. C. section 10, et seq.  
Jurisdiction is therefore based upon 28 U. S. C. sections 1331 and 1338(a),

1 providing for federal question jurisdiction of patent infringement actions and  
2 exclusive jurisdiction of patent infringement actions in the U. S. district courts.

3 3. Plaintiff Mega is informed and believes, and thereon alleges, that venue  
4 in this court is proper under 28 U. S. C. section 1391 (c) and section 1400 (b)  
5 because the acts of patent infringement alleged herein took place, at least in part,  
6 within this judicial district.

7 4. Plaintiff Mega is a California corporation, and has its principal place of  
8 business in Paramount, California.

9 5. Defendant Wolo is a New York corporation, and has its principal place  
10 of business in Deer Park, New York.

11 6. On April 20, 2010, the U. S. Patent and Trademark Office duly and  
12 lawfully issued the '063 patent under the title *Warning Light Lens*. A true and  
13 correct copy of the '063 patent is attached hereto as **Exhibit A**.

14 7. On June 29, 2010, the U.S. Patent and Trademark Office duly and  
15 lawfully issued the '572 patent under the title *Warning Light Lens*. A true and  
16 correct copy of the '572 patent is attached hereto as **Exhibit B**.

17 8. Since July 12, 2013, Wolo has infringed the '063 by selling, and  
18 offering to sell, in this judicial district and elsewhere in the United States, light bars  
19 with warning light lenses covered by the single claim of the '063 patent. Wolo's  
20 offers to sell and sale, in this judicial district, of Lights Bars, specifically models  
21 3780M-R; 3775M-B; 3770M-A; SURESAFE 3720M-A, have infringed the '063  
22 patent. Wolo has infringed the '572 patent by selling, and offering to sell, in this  
23 judicial district and elsewhere in the United States, light bars with warning lights  
24 lenses covered by the single claim of the '572 patent. Wolo's offer to sell and sale,  
25 in this judicial district, of LOOKOUT Light Bars, specifically models 7900-A;  
26 7905-B; 7910-R; 7915-BR; 7920-RB; and 7950-A, have infringed the '572 patent.  
27 Photographs and a spreadsheet of Wolo's infringing products are attached hereto as  
28 **Exhibits C**.



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5. Such other and further relief as the Court may deem just and proper.

Dated: September 2, 2015

Respectfully submitted,  
WAGNER, ANDERSON & BRIGHT PC

By: Patrick F. Bright  
Patrick F. Bright  
Attorneys for Plaintiff Mega Distribution  
Int'l Inc.

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**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, and Local Rule 38-1, Plaintiff Mega does hereby demand trial by jury of each and every issue and claim as to which it is entitled to trial by jury under Rule 38(a) of the Federal Rules of Civil Procedure.

Dated: September 2, 2015

Respectfully submitted,  
WAGNER, ANDERSON & BRIGHT PC

By:   
Patrick F. Bright  
Attorneys for Plaintiff Mega Distribution  
Int'l Inc.

# **EXHIBIT A**



US00D614063S

(12) **United States Design Patent** (10) **Patent No.:** **US D614,063 S**  
**Shin** (45) **Date of Patent:** **\*\* Apr. 20, 2010**

(54) **WARNING LIGHT LENS**

(76) **Inventor:** **David D Shin, 7322 Madison St.,  
 Paramount, CA (US) 90723**

(\*\*) **Term:** **14 Years**

(21) **Appl. No.:** **29/352,301**

(22) **Filed:** **Dec. 18, 2009**

(51) **LOC (9) Cl.** ..... **10-05**

(52) **U.S. Cl.** ..... **D10/114**

(58) **Field of Classification Search** ..... **D10/109,  
 D10/111, 114; D26/29-31, 60, 37, 24; 362/158,  
 362/171-174, 183-208**

See application file for complete search history.

(56) **References Cited**

**U.S. PATENT DOCUMENTS**

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D221,106 S	7/1971	Tixier	
4,020,047 A	4/1977	Burland	
D246,131 S	10/1977	Schifrin	
D246,330 S *	11/1977	Krase et al.	D26/76
D248,791 S	8/1978	Tixier	
D255,883 S	7/1980	Ferenc	
D282,687 S	2/1986	McMahon	
D352,914 S	11/1994	Sours	
D375,180 S	10/1996	Lyons	
D397,633 S *	9/1998	Yang et al.	D10/111
D402,576 S	12/1998	Yang et al.	
D407,168 S *	3/1999	Arakelian	D26/28
D414,712 S *	10/1999	Yang et al.	D10/111
D483,511 S	12/2003	Lay	
D530,437 S	10/2006	Neufeglise	
D542,948 S	5/2007	Columbo	
D564,108 S	3/2008	Lassen	
D583,695 S *	12/2008	Grote, Jr.	D10/109

D584,180 S	1/2009	Pokorny
D589,835 S	4/2009	Pokorny
D591,187 S	4/2009	Pokorny
D591,188 S	4/2009	Pokorny
D593,428 S	6/2009	Lyons
D595,172 S	7/2009	Pokorny
2005/0190553 A1	9/2005	Lynch et al.

\* cited by examiner

*Primary Examiner*—Caron Veynar

*Assistant Examiner*—George D Kirschbaum

(74) *Attorney, Agent, or Firm*—Kirk A. Buhler; Buhler & Associates

(57) **CLAIM**

The ornamental design of a warning light lens, as shown and described.

**DESCRIPTION**

FIG. 1 is a top perspective view for a warning light lens showing my new design;

FIG. 2 is a top view thereof;

FIG. 3 is a right view, the opposite left side is a mirror image thereof;

FIG. 4 is a bottom view thereof;

FIG. 5 is a front view, the opposite back side is a mirror image thereof;

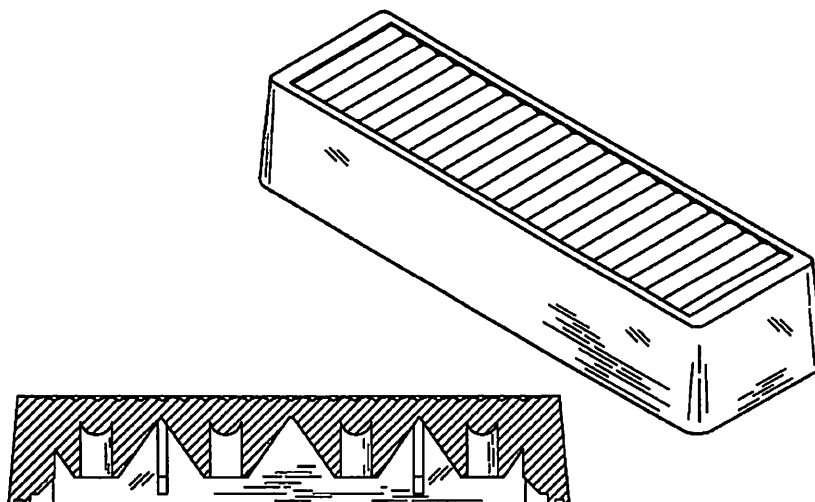
FIG. 6 is a cross-sectional view taken along lines 6—6 from FIG. 4 thereof;

FIG. 7 is a cross-sectional view taken along lines 7—7 from FIG. 4; and,

FIG. 8 is a perspective view of the warning light lens with environmental mounted hardware.

The broken lines in FIG. 8 depict environmental subject matter of mounting hardware for the invention only and form no part of the claimed design.

**1 Claim, 4 Drawing Sheets**

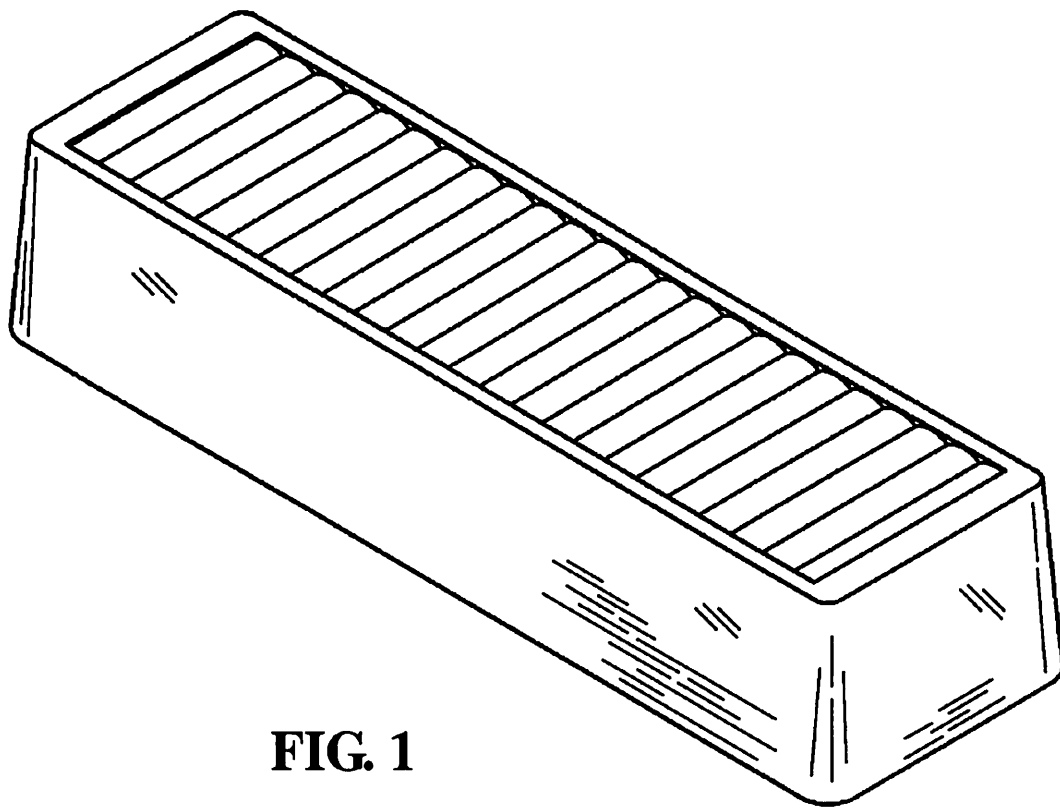


**U.S. Patent**

**Apr. 20, 2010**

**Sheet 1 of 4**

**US D614,063 S**



**FIG. 1**



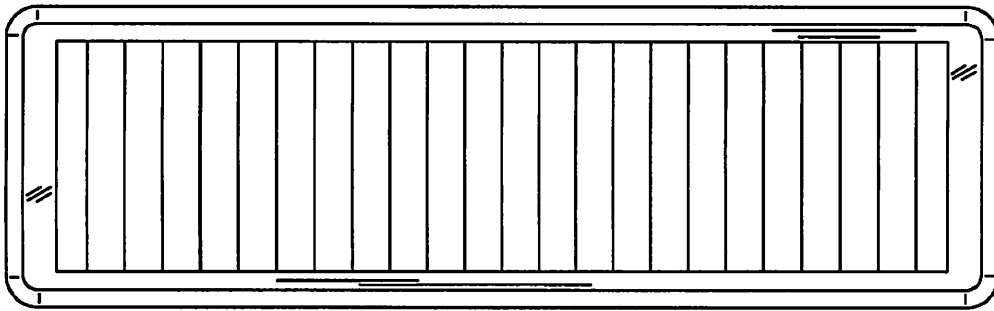


FIG. 2



FIG. 3

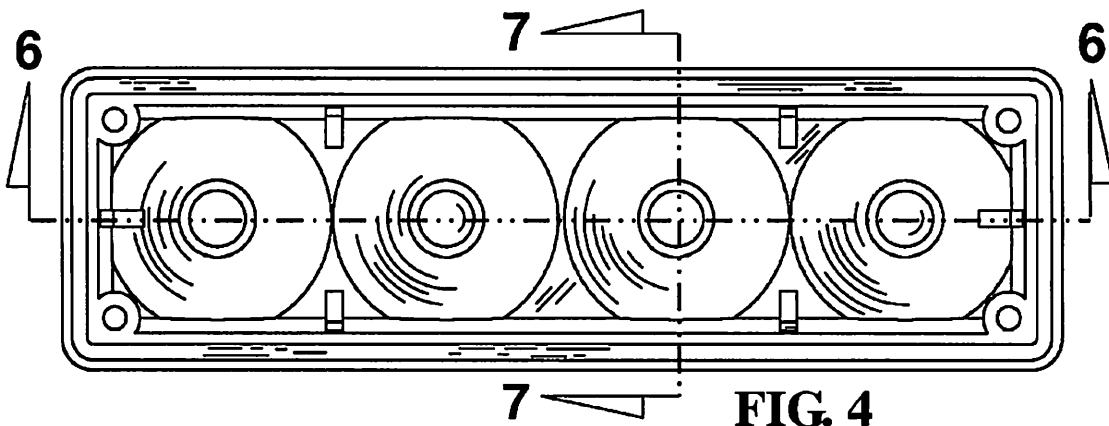


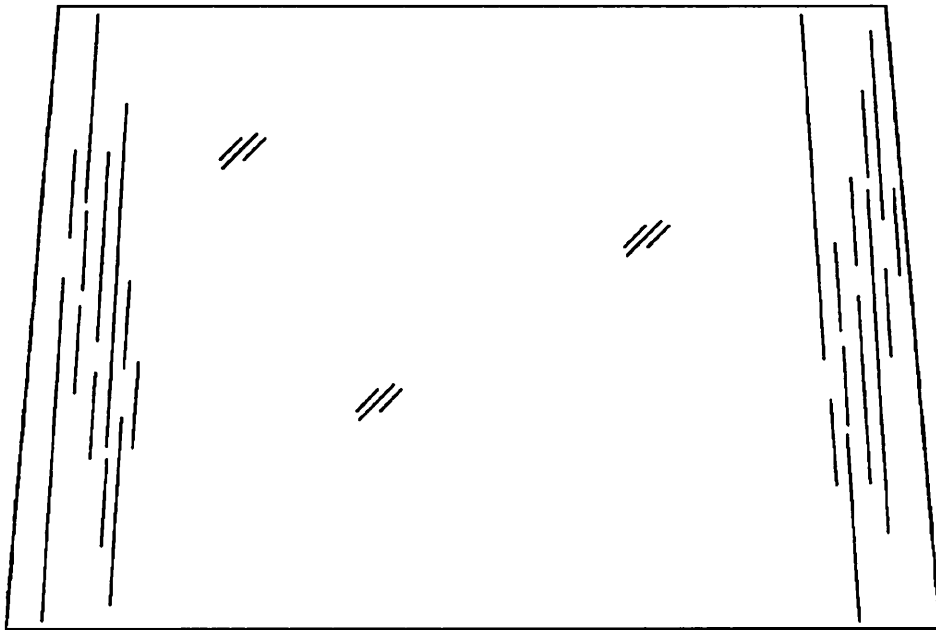
FIG. 4

**U.S. Patent**

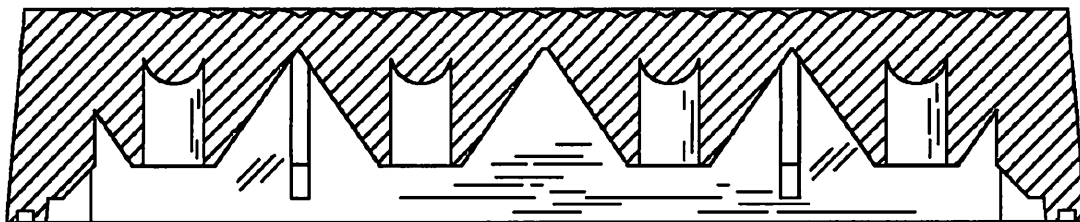
**Apr. 20, 2010**

**Sheet 3 of 4**

**US D614,063 S**



**FIG. 5**



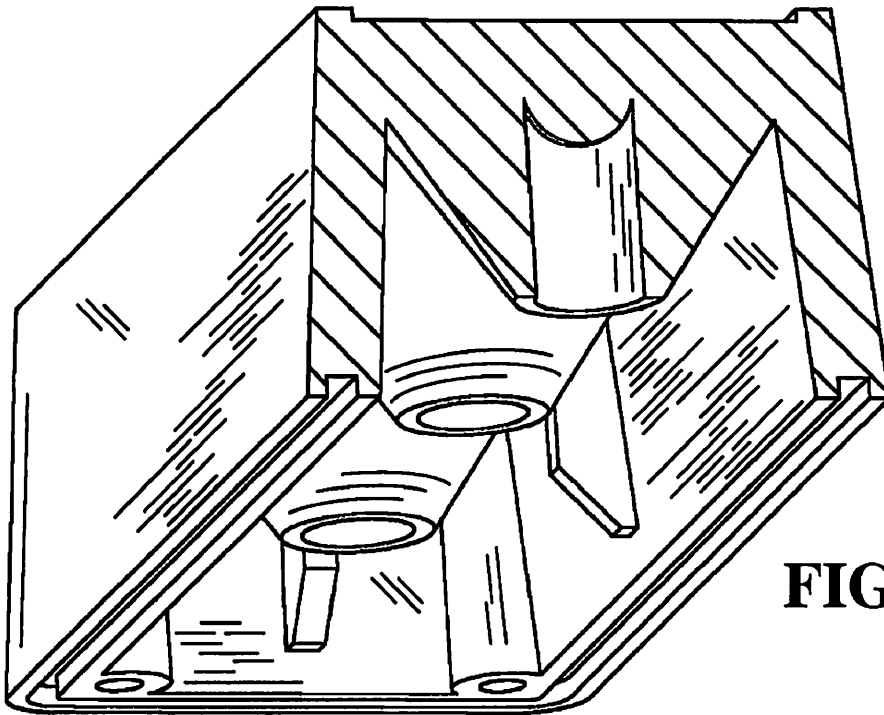
**FIG. 6**

**U.S. Patent**

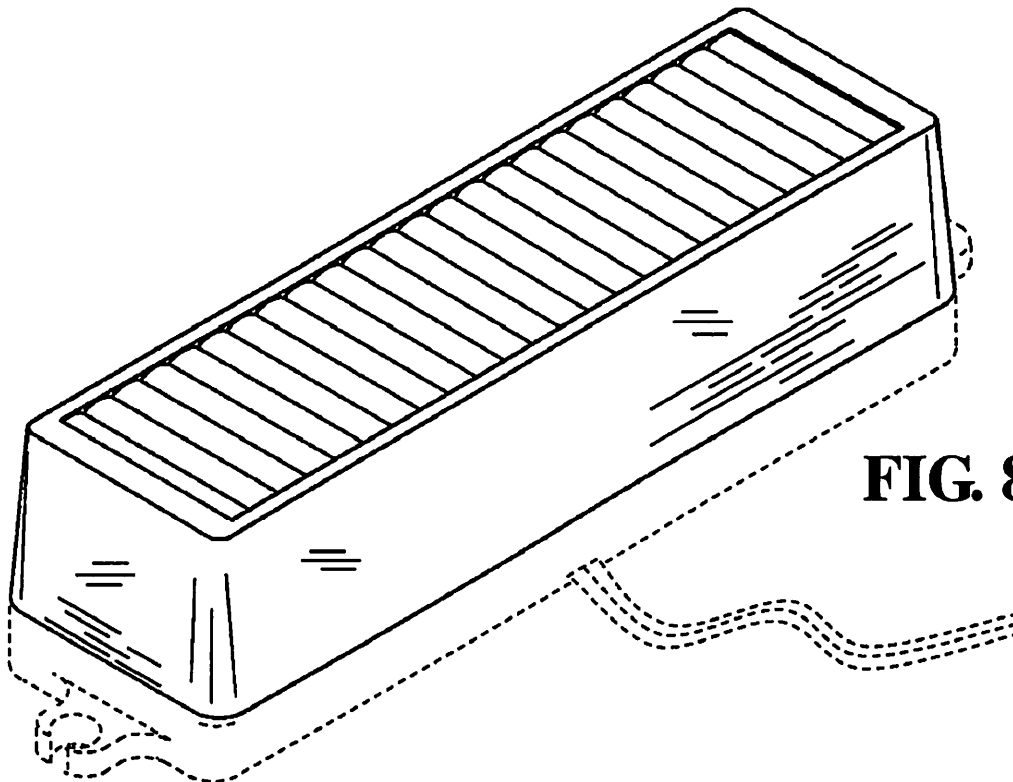
Apr. 20, 2010

Sheet 4 of 4

**US D614,063 S**



**FIG. 7**



**FIG. 8**

# **EXHIBIT B**



US00D618572S

(12) **United States Design Patent** (10) **Patent No.:** **US D618,572 S**  
**Shin** (45) **Date of Patent:** **\*\* Jun. 29, 2010**

(54) **WARNING LIGHT LENS**  
 (76) **Inventor:** **David D Shin, 7322 Madison St.,  
 Paramount, CA (US) 90723**  
 (\*\*) **Term:** **14 Years**  
 (21) **Appl. No.:** **29/352,299**  
 (22) **Filed:** **Dec. 18, 2009**  
 (51) **LOC (9) Cl.** ..... **10-05**  
 (52) **U.S. Cl.** ..... **D10/114**  
 (58) **Field of Classification Search** ..... **D10/109,  
 D10/111, 114; D26/29-31, 60, 37, 24; 362/158,  
 362/171-174, 183-208**  
 See application file for complete search history.

D589,835 S 4/2009 Pokorny  
 D591,187 S 4/2009 Pokorny  
 D591,188 S 4/2009 Pokorny  
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\* cited by examiner

*Primary Examiner*—Caron Veynar  
*Assistant Examiner*—George D Kirschbaum  
 (74) *Attorney, Agent, or Firm*—Kirk A. Buhler, Buhler & Associates

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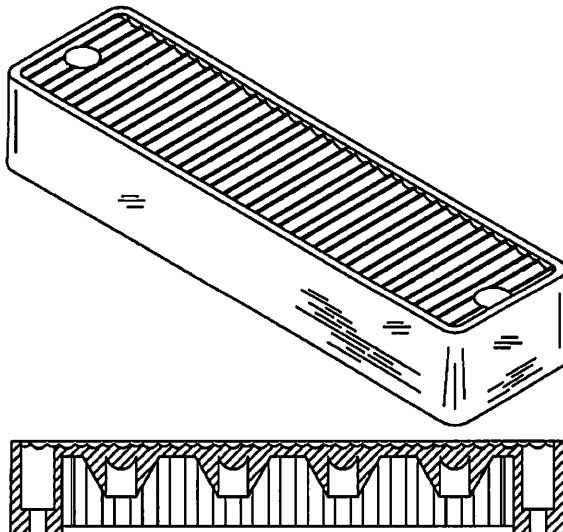
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4,020,047 A	4/1977	Burland	
D246,131 S	10/1977	Schifrin	
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D255,883 S	7/1980	Ferenc	
D282,687 S	2/1986	McMahon	
D352,914 S	11/1994	Sours	
D375,180 S	10/1996	Lyons	
D397,633 S *	9/1998	Yang et al.	D10/111
D402,576 S	12/1998	Yang et al.	
D407,168 S *	3/1999	Arakelian	D26/28
D414,712 S *	10/1999	Yang et al.	D10/111
D483,511 S	12/2003	Lay	
D530,437 S	10/2006	Neufeglise	
D542,948 S	5/2007	Columbro	
D564,108 S	3/2008	Lassen	
D583,695 S *	12/2008	Grotc, Jr.	D10/109
D584,180 S	1/2009	Pokorny	

**DESCRIPTION**

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 FIG. 2 is a top view thereof;  
 FIG. 3 is a right view, the opposite left side is a mirror image thereof;  
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**1 Claim, 4 Drawing Sheets**

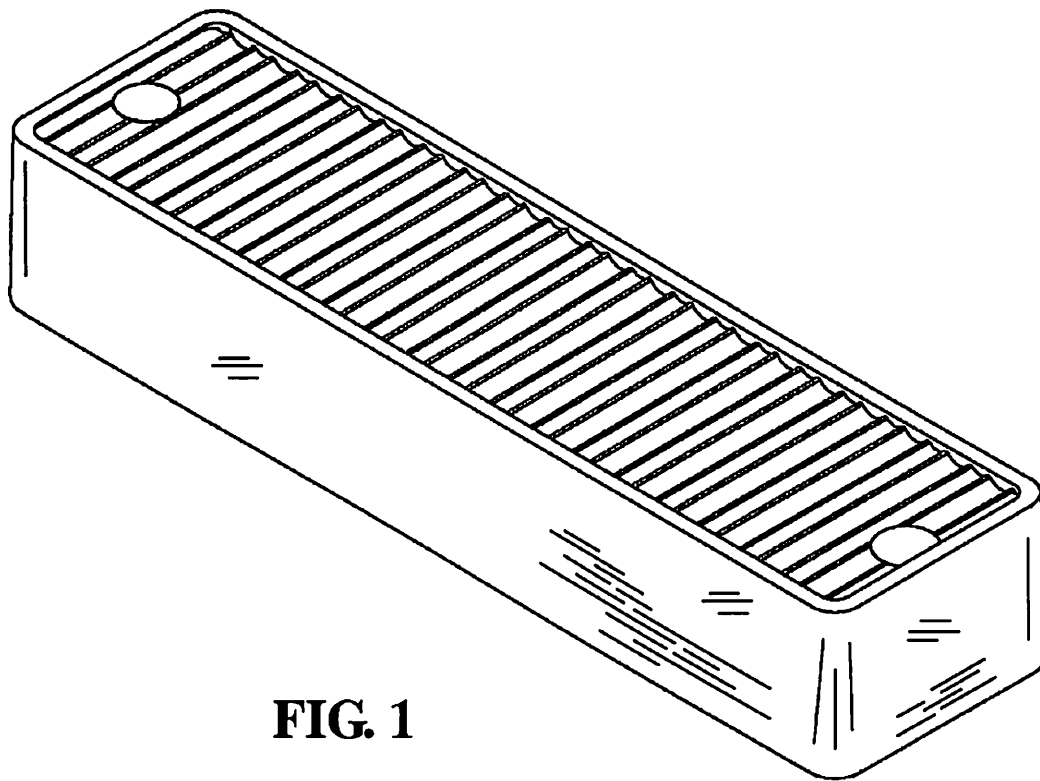


**U.S. Patent**

**Jun. 29, 2010**

**Sheet 1 of 4**

**US D618,572 S**



**FIG. 1**

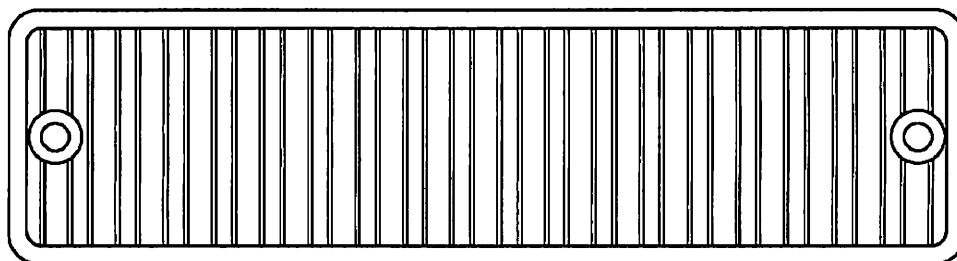


FIG. 2

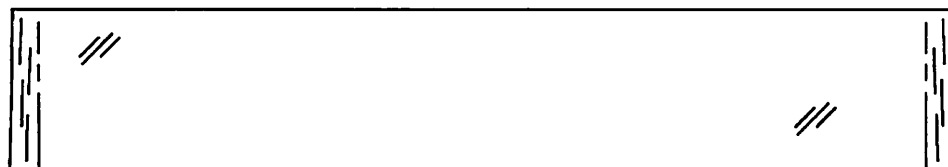


FIG. 3

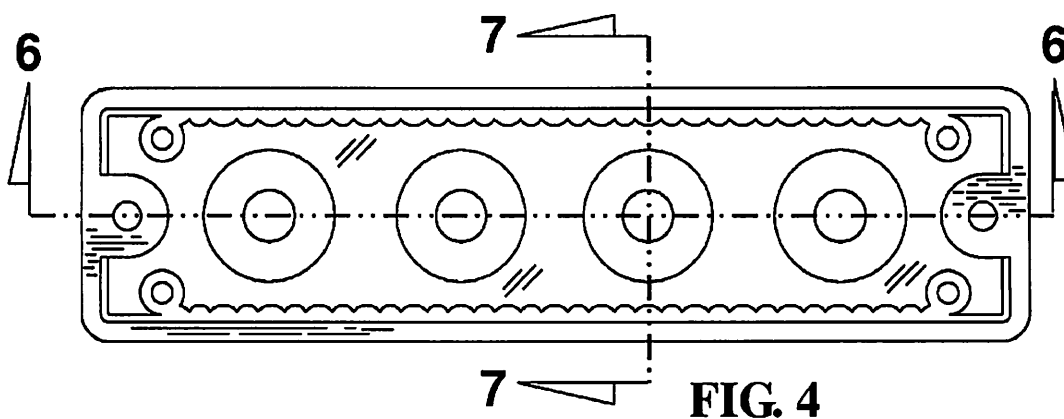


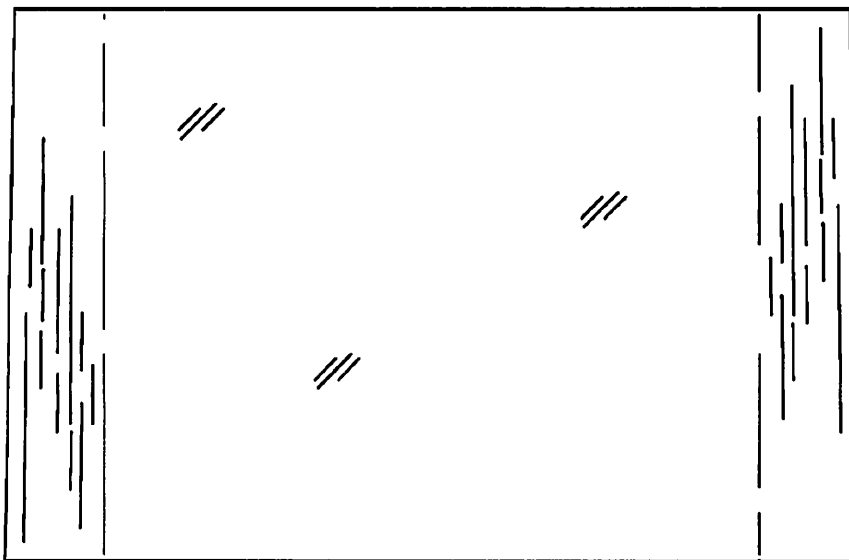
FIG. 4

**U.S. Patent**

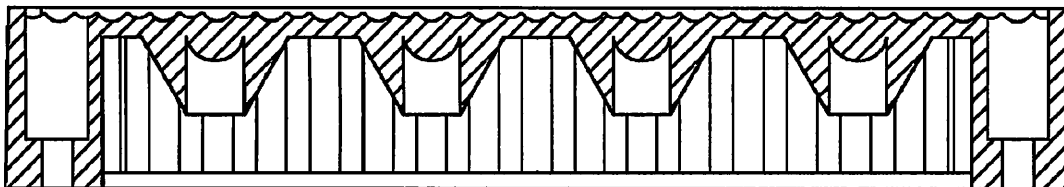
**Jun. 29, 2010**

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**US D618,572 S**



**FIG. 5**



**FIG. 6**



U.S. Patent

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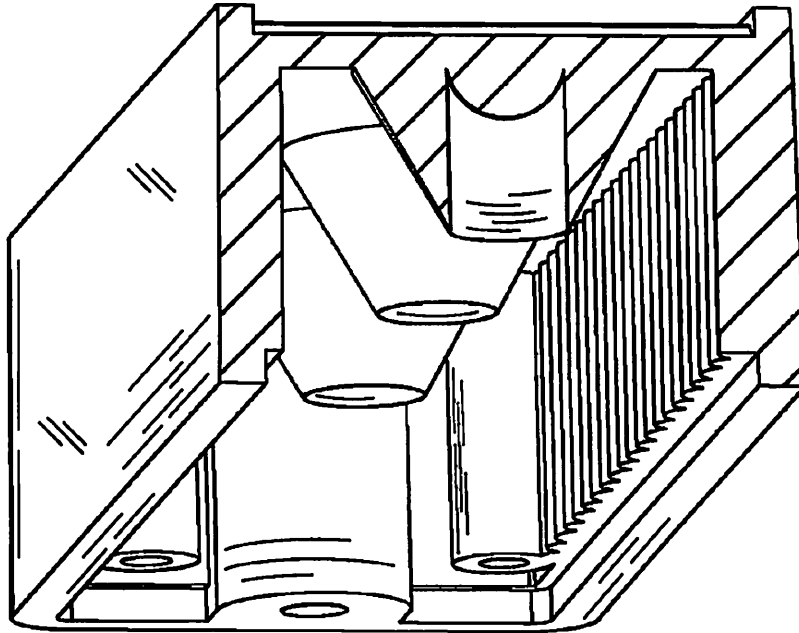


FIG. 7

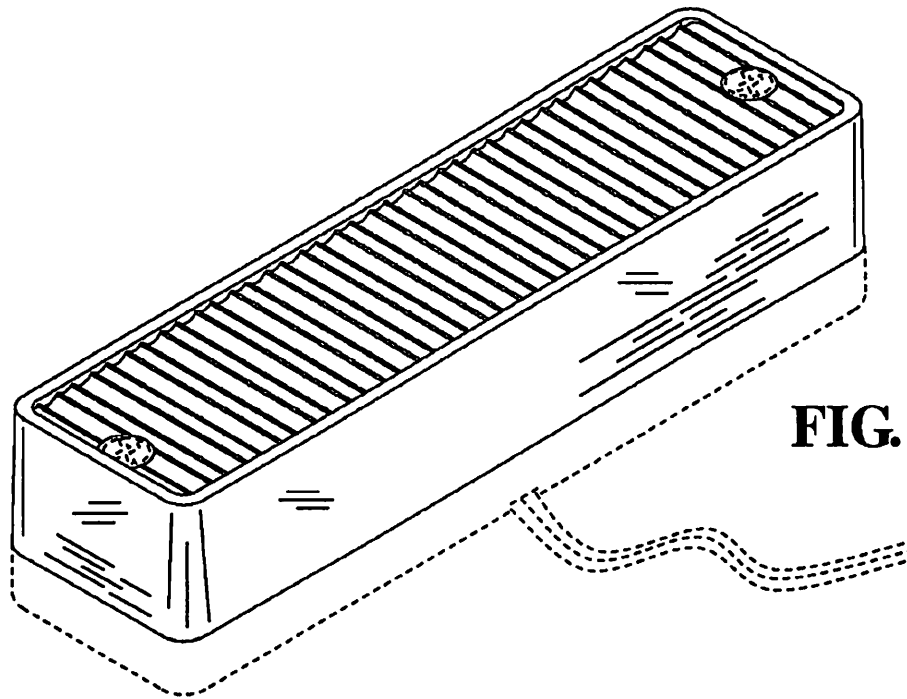


FIG. 8

# **EXHIBIT C**

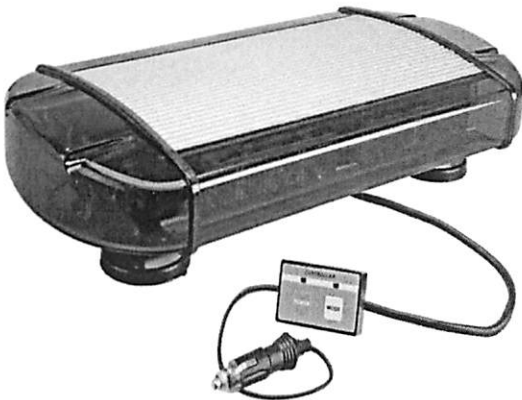
WOLO'S PRODUCT  
7900-A, 7905-B, 7910-R, 7915-BR, 7920-RB, 7950-A  
3780M-R, 3775M-B, 3770M-A

DESIGN PATENT      MODEL NUMBER



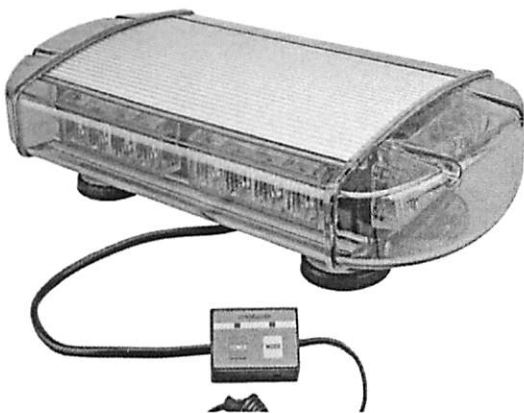
D614,063

3780M-R



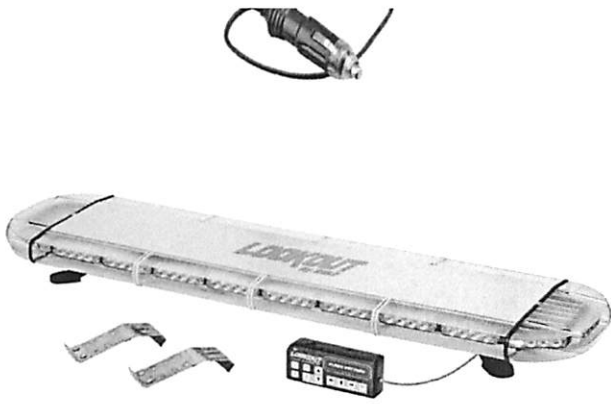
D614,063

3775M-B



D614,063

3770M-A



D618,572

7900-A, 7905-B,  
7910-R, 7915-BR,  
7920-RB, 7950-A



D614,063

3720M-A