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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9 **WESTERN DIVISION**

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11 **MEGA DISTRIBUTION INT'L. INC.,**
a California Corporation

12 Plaintiff,

13 vs.

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15 **ZEEZ INTERNATIONAL TRADING**
INC., a California Corporation
16 Defendant.

Case No. 2:16-cv-240

**COMPLAINT FOR INFRINGEMENT
OF UNITED STATES PATENT
NO. D614,063;**

DEMAND FOR JURY TRIAL

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19 1. Plaintiff Mega Distribution Int'l, Inc., a California corporation
20 ("Mega"), for its complaint, and demanding trial by jury under Rule 38, Fed. R. Civ.
21 P., and Local Rule 38-1, alleges that Zeez International Trading Inc. ("Defendant"),
22 a California corporation, is infringing U.S. Design Patent D614,063 ("the '063
23 patent"), by making, selling, and offering to sell, in this judicial district, light bars
24 that infringe the '063 patent.

25 2. This is a civil action for patent infringement and arises under, among
26 other things, the United States Patent Laws, 35 U. S. C. section 10, et seq.
27 Jurisdiction is therefore based upon 28 U. S. C. sections 1331 and 1338(a),
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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 is a California corporation, and has its principal place of
10 business in South El Monte, California.

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. Since 2013, Defendant has infringed the '063 patent by selling, and
15 offering to sell, in this judicial district and elsewhere in the United States, light bars
16 with warning light lenses covered by the single claim of the '063 patent.
17 Defendant's offers to sell and sale, in this judicial district, of lights bars, specifically
18 models Amber& White LED Emergency Warning Flash Strobe Light Dashboard
19 Widshield; and 32 Amber/Yellow LED Traffic Advisor Emergency Warning Flash
20 Strobe Light Bar, have infringed the '063 patent. Photographs and a spreadsheet of
21 Defendant's infringing products are attached hereto as **Exhibit B**.

22 8. Upon information and belief, Defendant's infringement has taken place
23 with full knowledge of the '063 patent and has been intentional, deliberate, and
24 willful.

25 9. Upon information and belief, Defendant has derived, and will continue
26 to derive, and received from the above infringement, gains, profits, and advantages
27 in an amount not presently known to Mega.
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10. Defendant’s infringement of the ‘063 patent has damaged Mega in an unknown amount. These damages continue to grow as Defendant’s infringement continues. Under Section 284 of Title 35 of the United States Code, Mega seeks damages adequate to compensate for this infringement in an amount no less than Defendant’s total profit, from sales of the infringing products, together with interest and costs affixed by the Court. Under Section 289 of Title 35 of the United States Code, Mega also seeks its lost profit.

11. Defendant’s continuing infringement of the ‘063 patent has caused and continues to cause irreparable harm to Mega, including impairing the value of the ‘063 patent in an amount yet to be determined. Pursuant to Section 283 of Title 35 of the United States Code, Mega seeks a preliminary and a permanent injunction against further infringement of the ‘063 patent.

PRAYER FOR RELIEF

WHEREFORE, Mega prays for the following relief from this court against Defendant:

1. An order, pursuant to 35 U.S.C. Section 271, declaring that Defendant has infringed the single claim of the ‘063 patent;
2. A preliminary and a permanent injunction against Defendant, prohibiting Defendant from further infringement of the ‘063 patent;
3. An award of the actual damages Mega has suffered by reason of the infringement charged in this Complaint, in an amount not less than Defendant’s total profit from Defendant’s sales of the products charged with infringing the ‘063 patent;
4. An award to Plaintiff Mega of its costs of suit herein; and
5. Such other and further relief as the Court may deem just and proper.

1 Dated: January 12, 2016

Respectfully submitted,

WAGNER, ANDERSON & BRIGHT PC

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4 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: January 12, 2016

Respectfully submitted,
WAGNER, ANDERSON & BRIGHT PC

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