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6 Attorneys for Plaintiff

7  
8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF ARIZONA**

10 Triclawps, LLC an Arizona limited  
11 liability company,

12 Plaintiff,

13 vs.

14 Shadow Tech LLC, a Kansas limited  
15 liability company, and Joshua E. Stabler,  
16 an individual.

17 Defendants.

**COMPLAINT**

(Patent Infringement)

(Jury Trial Demanded)

18 For its complaint against Defendant Shadow Tech LLC, Plaintiff Triclawps, LLC  
19 alleges as follows:

- 20 1. Plaintiff Triclawps, LLC is an Arizona limited liability company having a  
21 business address at 2701 W. Tulsa Street, Chandler, AZ 85224 (“Triclawps”).  
22 2. Defendant Shadow Tech LLC is a Kansas limited liability company having a  
23 business address at 4111 W 74<sup>th</sup> Terrace, Prairie Village, KS 66208 (“Shadow Tech”).  
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1           3. Defendant Joshua E. Stabler is the principal of Shadow Tech LLC, is a resident  
2 of the state of Kansas, and has a residence at 4111 W 74<sup>th</sup> Terrace, Prairie Village, KS 66208  
3 (“Stabler”).

4           4. This is an action arising under the Patent Laws of the United States, Title 35 of  
5 the United States Code. Original jurisdiction is predicated under 28 U.S.C. §§ 1332 and  
6 1338. Venue in Arizona is proper under 28 U.S.C. §§ 1391 and 1400.

7                                           GENERAL ALLEGATIONS

8           5. Plaintiff is the owner of U.S. Patent No. 9,206,941 titled APPARATUS AND  
9 METHOD FOR CLAMPING (the “’941 Patent”). The ’941 Patent was issued on December  
10 18, 2015 from an application filed October 27, 2008 and subsequently assigned to Plaintiff.  
11 A copy of the ’941 Patent is attached hereto as Exhibit A.

12           6. Plaintiff manufactures and sells tripod-mounted rifle rests embodying one or  
13 more claims of the ’941 Patent including the Triclawps<sup>TM</sup> rifle rest. Plaintiff markets its rifle  
14 rest through retailers and directly to consumers through its web site www.triclawps.com.

15           7. Defendants are infringing and/or inducing others to infringe the ’941 Patent by  
16 making, using, importing, offering to sell, and/or selling in the United States products or  
17 processes that practice one or more claims of the ’941 Patent. On information and belief,  
18 Defendant Stabler is the principal actor directing the activities of defendant Shadow Tech  
19 and therefore is personally liable for its activities. Defendant Shadow Tech is jointly and  
20 severally liable for the conduct of Defendant Stabler as his *respondeat superior*.

21           8. Defendants have been and/or are directly infringing and/or inducing  
22 infringement of and/or contributorily infringing the ’941 patent by, among other things,  
23 making, using, offering to sell or selling in the United States products including, by way of  
24 example and not limitation, the Hog Saddle<sup>TM</sup> and Pig Saddle<sup>TM</sup> rifle rests. Copies of the  
25 web pages advertising the Hog Saddle<sup>TM</sup> and Pig Saddle<sup>TM</sup> are attached hereto as Exhibit B.

1 9. Defendants market and sell their rifle rest directly to consumers through a  
2 website at www.hogsaddle.com.

3 10. On information and belief, Defendants also market and sell their rifle rest to  
4 federal and/or state government agencies.

5 11. On information and belief, Plaintiff and Defendants account for the majority of  
6 sales of camera tripod-mounted rifle rests in the United States.

7 12. Defendants have profited through infringement of the '941 Patent. As a result  
8 of Defendants' unlawful infringement of the '941 Patent, Plaintiff has suffered and will  
9 continue to suffer damage. Plaintiff is entitled to recover from Defendants, jointly and  
10 severally, the damages suffered by Plaintiff as a result of Defendants' unlawful acts.

11 13. On information and belief, Defendants intend to continue their unlawful  
12 infringing activity, and Plaintiff continues to and will continue to suffer irreparable harm for  
13 which there is no adequate remedy at law unless Defendants are enjoined by this Court.

14  
15 **CLAIM FOR RELIEF**

16 (PATENT INFRINGEMENT)

17 14. Plaintiff incorporates by reference and re-alleges each of the allegations set  
18 forth in Paragraphs 1 through 14 as if set forth fully herein.

19 15. By manufacturing, using, importing, selling and/or offering the Hog Saddle™  
20 and Pig Saddle™ rifle rests for sale in the United States without authority from Plaintiff,  
21 Defendants have infringed, and continue to infringe, one or more claims of the '941 Patent.

22 16. Plaintiff has suffered and will continue to suffer damages on account of  
23 Defendants' infringement and continuing infringement of the '941 Patent.

24 17. Defendants' infringement of the '941 Patent will continue unless enjoined.

1 18. Plaintiff is entitled to preliminary and permanent injunctions enjoining  
2 Defendant from infringing the '941 Patent.

3 19. Plaintiff is entitled to damages adequate to compensate for Defendants'  
4 wrongful acts as provided by 35 U.S.C. § 284 including, but not limited to, a reasonable  
5 royalty from the sales of infringing products and parts therefor and for its lost profits.

6 20. Plaintiff is entitled to recover its costs as provided by 35 U.S.C. § 284.

7 21. Plaintiff is entitled to recover its attorneys' fees as provided by 35 U.S.C.  
8 § 285.

9 **DEMAND FOR JURY TRIAL**

10 22. Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff  
11 respectfully requests a trial by jury of all issues properly triable by jury.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff prays for relief as follows:

14 A. For a judgment declaring that Defendants have infringed the '941 Patent;

15 B. For a judgment awarding Plaintiff compensatory damages as a result of  
16 Defendant's infringement of the '941 Patent, together with interest and costs, and  
17 in no event less than a reasonable royalty;

18 C. For a judgment declaring that Defendant's infringement of the '941 Patent has  
19 been willful and deliberate;

20 D. For a judgment awarding Plaintiff treble damages and pre-judgment interest under  
21 35 U.S.C. § 284 as a result of Defendant's willful and deliberate infringement of  
22 the '941 Patent;

23 E. For a judgment declaring that this case is exceptional and awarding Plaintiff its  
24 expenses, costs, and attorneys' fees in accordance with 35 U.S.C. §§ 284 and 285  
25 and Rule 54(d) of the Federal Rules of Civil Procedure;

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F. For a grant of a permanent injunction pursuant to 35 U.S.C. § 283, enjoining the Defendant from further acts of infringement; and

G. For such other and further relief as the Court deems just and proper.

DATED Tuesday, January 19, 2016.

**HARTMAN TITUS PLC**

By: s/ John D. Titus

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