

1 Thomas I. Rozsa, State Bar No. 080615
2 Zsofia Nemeth, State Bar No. 298240
3 **ROZSA LAW GROUP LC**
4 18757 Burbank Boulevard, Suite 220
5 Tarzana, California 91356-3346
6 Telephone (818) 783-0990
7 Facsimile (818) 783-0992
8 Email: counsel@rozsalaw.com

9 Attorneys for dbest products Inc.

10 **UNITED STATES DISTRICT COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA (WESTERN DIVISION)**

12 **DBEST PRODUCTS INC., a**
13 **California corporation,**

14 **Plaintiff,**

15 **vs.**

16 **NORDIC GROUP OF COMPANIES,**
17 **LTD., a corporation of Wisconsin;**
18 **FLAMBEAU, INC., a corporation of**
19 **Wisconsin; ARTBIN, a subsidiary of**
20 **Flambeau, Inc.; and DOES 1-10,**
21 **Inclusive,**

22 **Defendants.**

CASE NO.: 16CV1461

COMPLAINT FOR

- 1. **PATENT INFRINGEMENT**
- 2. **TRADE DRESS INFRINGEMENT**
- 3. **FALSE DESIGNATION OF ORIGIN**
- 4. **CALIFORNIA UNFAIR COMPETITION**
- 5. **COMMON LAW TRADEMARK INFRINGEMENT**
- 6. **COMMON LAW UNFAIR COMPETITION**

DEMAND FOR JURY TRIAL

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 COMES NOW Plaintiff DBEST PRODUCTS INC., a corporation of
2 California (hereafter “Plaintiff” or “dbest”), and for its Complaint against
3 NORDIC GROUP OF COMPANIES, LTD., a corporation of Wisconsin (hereafter
4 “Nordic Group”); FLAMBEAU, INC., a corporation of Wisconsin (hereafter
5 “Flambeau”; ARTBIN, a subsidiary of Flambeau, Inc. (hereafter “ArtBin”)
6 (hereafter Nordic, Flambeau and ArtBin are jointly referred to as “Defendants”)
7 and DOES 1-10, complains and alleges as follows:

8
9 **THE PARTIES**

10 1. Plaintiff DBEST PRODUCTS INC. is a corporation duly formed and
11 existing under the laws of the State of California and has its principal place of
12 business located at 15500 Cornet Street, Santa Fe Springs, California 90670. dbest
13 is the owner by assignment of all title, right and interest in and to the United States
14 Patent 8,439,374 (hereafter “the ‘374 Patent”), with the right to enforce the ‘374
15 Patent. During the time period from May 14, 2013 through February 17, 2016,
16 dbest was the exclusive licensee of the ‘374 Patent with the right to enforce the
17 ‘374 Patent, which is the subject of this Complaint.

18 2. Plaintiff is informed and believes and based thereon alleges that
19 Defendant NORDIC GROUP OF COMPANIES, LTD. is a corporation formed
20 and existing under the laws of the State of Wisconsin and has its principal place of
21 business located at 715 Lynn Avenue, Suite 100, Baraboo, Wisconsin 53913.

22 3. Plaintiff is informed and believes and based thereon alleges that
23 Defendant FLAMBEAU, INC. is a corporation formed and existing under the laws
24 of the State of Wisconsin and has its principal place of business located at 801
25 Lynn Ave., Baraboo, Wisconsin 53913. Plaintiff is further informed and believes
26 and based thereon alleges that Flambeau is a wholly-owned subsidiary of the
27 Nordic Group.
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 4. Plaintiff is informed and believes and based thereon alleges that
2 Defendant ARTBIN is a division of Flambeau, with its principal place of business
3 at 15981 Valplast Road Middlefield, Ohio 44062.

4 5. Plaintiff is informed and believes and based thereon alleges that the
5 Defendants are doing continuous and substantial business within this judicial
6 district in the State of California. In particular, Plaintiff is informed and believes
7 and based thereon alleges that ArtBin has been and is advertising, offering for sale,
8 selling and/or placing products in the stream of commerce in the United States
9 knowing that they will be sold to consumers in this judicial district. In particular,
10 as set forth in detail below, ArtBin has been and is advertising, offering for sale
11 and/or selling the infringing “ArtBin Rolling Tote”, item no. 6822AG (hereafter
12 “Knockoff Tote”) in this judicial district.

13 6. Plaintiff is ignorant of the true names and capacities of defendants
14 sued herein as DOES 1 through 10, inclusive, and therefore sues such defendants
15 by such fictitious names. At such time as the true names and capacities of these
16 DOE defendants are ascertained, Plaintiff will seek leave of the Court to amend its
17 Complaint to allege their true names and capacities. Plaintiff is informed and
18 believes, and upon such information and belief alleges, that at all times mentioned
19 herein, each of the DOE defendants was responsible, along with the named
20 Defendants. Plaintiff is further informed and believes and based thereon alleges
21 that the Defendants and the DOE defendants, and each and every one of them,
22 knowingly and willfully conspired and agreed among themselves or induced each
23 other to commit the wrongful acts as set forth herein. These wrongful acts were
24 done pursuant to and in furtherance of this conspiracy, agreement and/or
25 inducement. Plaintiff is further informed and believes and based thereon alleges
26 that certain individuals named at this time as DOE defendants and each of them,
27 are responsible in some manner, by their acts and/or omissions, for the matters
28

1 alleged herein. The wrongful acts alleged herein were done through their acts
2 and/or omissions.

3 7. Plaintiff is informed and believes and based thereon alleges that at all
4 times mentioned herein, Defendants, and each of them, were and are the agents,
5 servants, employees, parents, subsidiaries, and/or co-conspirators of each other,
6 and were and are acting within the scope of such agency or employment, parent
7 ownership, or subsidiary ownership, or otherwise participated in the improper
8 conduct alleged herein. Each of the Defendants is in some form or manner
9 responsible for the conduct herein complained of, and Plaintiff's harm and
10 damages are proximately caused by the conduct of each.

11 **JURISDICTION AND VENUE**

12 8. The first cause of action is for patent infringement, which arises under
13 the patent laws of the United States, Title 35 U.S.C. §§ 101 et seq., particularly in
14 violation of § 271 and under §§ 282-285. This Court has original jurisdiction over
15 the subject matter of this cause of action pursuant to Article 1, Section 8 of the
16 United States Constitution, and pursuant to the provisions of 28 U.S.C. §§ 1331
17 and 1338(a).

18 9. This Court also has original jurisdiction over the subject matter of the
19 second and third causes of action pursuant to the provisions of 28 U.S.C. §§ 1331
20 and 1338(a) as well as 15 U.S.C. §§ 1125, because these causes of action are for
21 trade dress infringement and false designation of origin, which arise under the
22 Trademark (Lanham) Act of 1946, as amended, 15 U.S.C. § 1051, et seq.

23 10. This Court also has original jurisdiction over the subject matter of the
24 fourth through sixth causes of action pursuant to the provisions of 28 U.S.C. §
25 1338(b), because these causes of action are for California unfair competition under
26 California Business and Professions Code § 17200 and California common law,
27 and California trademark infringement in violation of California common law, all
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 of which are claims for unfair competition under California law that are joined
2 with a substantial and related claim under the trademark laws of the United States.

3 11. Further, this Court has supplemental jurisdiction over the fourth
4 through sixth causes of action, which assert state law claims, pursuant to the
5 provisions of 28 U.S.C. 1367(a). These state law claims are so related to the other
6 claims in this case, over which the Court has original jurisdiction, that they form a
7 part of the same case or controversy under Article III of the United States
8 Constitution.

9 12. This Court has personal jurisdiction over the Defendants who have
10 been and are transacting substantial and continuous business within this judicial
11 district and committed acts of infringement within this judicial district. Namely,
12 Plaintiff is informed and believes and based thereon alleges that on or about
13 January 7 through 12, 2016, ArtBin was an exhibitor at the Craft & Hobby
14 Association's CHA MEGA Conference and Trade Show held at the Anaheim
15 Convention Center in Anaheim, California (hereafter "2016 CHA Show") where
16 ArtBin advertised, offered for sale and took pre-orders for the Knockoff Totes.
17 Furthermore, retailer customers in the State of California may order merchandise
18 directly from the Defendants and have the merchandise delivered in California.
19 Therefore, a substantial part of Defendants' acts complained of herein, and the
20 events giving rise to the claims in this case occurred in this judicial district.
21

22 13. This Court has personal jurisdiction over the Defendants who have
23 committed acts of patent infringement, trade dress infringement, false designation
24 of origin, unfair competition and trademark infringement within this judicial
25 district. A substantial part of Defendants' acts complained of herein, and the events
26 giving rise to the claims in this case occurred in this judicial district.

27 14. Each and every one of the Defendants is subject to the personal
28 jurisdiction of this Court because Plaintiff is informed and believes and based

1 thereon alleges that the Defendants have committed and/or actively induced the
2 infringing and improper acts complained of herein, and continue to do so, in this
3 judicial district.

4 15. Plaintiff is informed and believes, and based thereon alleges that
5 venue is proper in this judicial district under 28 U.S.C. §§ 1391 and 1400, in that,
6 inter alia, the matters in controversy arise out of the activities undertaken in this
7 judicial district and the Defendants, and each of them, are subject to the personal
8 jurisdiction of this Court.

9 **THE INTELLECTUAL PROPERTY RIGHTS OF DBEST**

10 16. On May 14, 2013, the '374 Patent issued for "LIGHTWEIGHT HIGH
11 LOAD CAPACITY FOLDING UTILITY CART WITH UNIQUE SUPPORT
12 STRUCTURE AND ERGONOMIC HANDLE", a true and correct copy of which
13 is attached hereto as **EXHIBIT 1** and incorporated herein by reference.

14 17. dbest has acquired and duly owns all right, title and interest in the
15 '374 Patent by virtue of proper assignment, including the right to sue and recover
16 for infringement thereof. During the period of May 14, 2013 through February 17,
17 2016, dbest was the exclusive licensee of the '374 Patent with the right to sue and
18 recover for the infringement of the '374 Patent.

19 18. The '374 Patent is in full force and effect.

20 19. dbest has been importing, advertising, promoting, distributing,
21 producing, offering for sale and selling products which practice the art disclosed in
22 the '374 Patent, under the brand name "Smart Cart", since at least as early as
23 September 2010. The products of dbest that practice the invention disclosed in the
24 '374 Patent are hereafter referred to collectively as "Smart Cart". A true and
25 correct printout of an advertising flyer showing the Smart Cart is attached hereto as
26 **EXHIBIT 2**.

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 20. dbest has properly marked the Smart Cart with the Patent Number
2 8,439,374 since the ‘374 Patent issued. dbest had been properly marking its
3 products with the designation “Patent Pending” while the application that matured
4 into the ‘374 Patent was pending.

5 21. Since at least as early as October 2010, and prior to the acts of
6 Defendants complained of herein, dbest has continuously imported, produced,
7 advertised, marketed, distributed, offered for sale and sold in interstate commerce
8 various lightweight, high load capacity folding utility carts that practice the
9 invention disclosed in the ‘374 Patent under the brand name Smart Cart. dbest’s
10 Smart Carts are unique in their market segment, and therefore instantly became a
11 commercial success. The Smart Carts have been very important products among
12 the assortment of products dbest offers to its customers. Demand for the various
13 Smart Carts of dbest has been steadily increasing since they were introduced to the
14 market.

15 22. dbest owns a federal trademark for “SMART CART” (word and
16 design mark) which bears U.S. Trademark Registration No. 4,005,342 and
17 registered on August 2, 2011, for carts. The trademark has been conspicuously
18 shown on all advertising materials and packaging for the Smart Carts, and on the
19 Smart Carts themselves. A true and correct copy of the Certificate of Registration
20 for the SMART CART mark is attached hereto as **EXHIBIT 3** and incorporated by
21 reference.

22 23. The Smart Cart is characterized by its distinctive shape, style and
23 overall appearance and design. The Smart Cart is further characterized by its
24 outstanding quality, design, materials of construction, workmanship, performance,
25 reliability and durability. The Smart Cart has been featuring the same overall
26 appearance, look and feel for over five years, since at least as early as October
27 2010. The Smart Cart was, and still is a unique product configuration in the market
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 of collapsible carts. dbest has spent substantial amounts annually to advertise the
2 Smart Cart, and sales of the products have been significant. dbest has developed
3 trade dress rights in the distinctive shape, style and overall appearance and design
4 of the Smart Cart by virtue of dbest's substantial and continuous use of the product
5 configuration in interstate commerce, extensive advertising and sales.

6 24. The distinctive shape, style and overall appearance and design of the
7 Smart Cart is ornamental, non-functional and has acquired secondary meaning with
8 the trade and the consuming public and/or has become distinctive in the minds of
9 customers in that this shape, style, overall appearance and design is associated with
10 dbest. dbest owns trade dress rights in the distinctive shape, style and overall
11 appearance and design of the Smart Cart (hereafter "Smart Cart Trade Dress").

12 25. Since at least as early as October 2010, dbest has widely advertised
13 the Smart Cart on its website, at trade shows and in specialty catalogs. The Smart
14 Carts have been enjoying great commercial success and significant sales. By way
15 of example, retailer customers of dbest who have been purchasing the Smart Cart
16 from dbest for years include renowned chains Bed Bath and Beyond, Staples,
17 Hobby Lobby, Notions Marketing and AC Moore. The Smart Cart products are
18 also sold through Amazon.com. The Smart Carts are widely appreciated by
19 retailers and end user customers alike and their sales have been increasing year
20 after year.

21 **INFRINGEMENT AND UNLAWFUL ACTS OF THE DEFENDANTS**

22 26. On or about January 7 through 12, 2016, dbest was an exhibitor at the
23 CHA Show, along with ArtBin. While attending the trade show, dbest has become
24 aware of the fact that ArtBin has been advertising, offering for sale and taking pre-
25 orders for the Knockoff Carts, which infringe upon dbest's patent rights in and to
26 the '374 Patent, and dbest's trade dress rights in and to the Smart Cart. Customers
27 of dbest inquired from dbest whether ArtBin's new offering, the Knockoff Totes
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 were produced by dbest. Attached hereto as **EXHIBIT 4** and incorporated herein
2 by reference are true and correct copies of the relevant pages of the New Products
3 Guide of ArtBin that were distributed at the 2016 CHA Show. The front and back
4 covers of ArtBin’s product guide, as well as page 4 show the Knockoff Totes that
5 dbest accuses of infringement.

6 27. Plaintiff is informed and believes and based thereon alleges that
7 Defendants have been manufacturing, importing, marketing, distributing, offering
8 for sale and selling the Knockoff Totes in spite of Defendants’ full knowledge of
9 dbest’s proprietary rights, including patent and trademark rights in and to the ‘374
10 Patent and the Smart Cart Trade Dress.

11 28. Plaintiff is informed and believes and based thereon alleges that
12 Defendants have had full knowledge of dbest’s Smart Cart products and dbest’s
13 exclusive rights in and to the Smart Carts, including the ‘374 Patent since as early
14 as January 2015. In January 2015, both dbest and ArtBin were exhibitors at the
15 2015 Crafts and Hobby Association MEGA Show held in Anaheim, California
16 (hereafter “2015 CHA Show”). dbest was heavily advertising its Smart Carts at the
17 2015 CHA Show and had sample products displayed at its booth. Plaintiff is
18 informed and believes and based thereon alleges that Marketing Communications
19 Specialist for ArtBin, Kimberly Tetmeyer and Bradley Aten, Sales Manager for
20 ArtBin, approached dbest at the 2015 CHA Show and were interested in having
21 dbest produce a customized Smart Cart for ArtBin. dbest welcomed the interest
22 and provided Bradley Aten with a product sample.

23 29. After the 2015 CHA Show, in or about February 2015, dbest and the
24 Defendants engaged in negotiations trying to work out the details of the order for
25 the customized Smart Cart the Defendants wished to order from dbest. On behalf
26 of the Defendants, Scott Briechele, National Sales Manager for ArtBin
27 corresponded with dbest in addition to Marketing Communications Specialist
28

1 Kimberly Tetmeyer. dbest clearly indicated to Defendants in its correspondence to
2 Scott Briechle and Kimberly Tetmeyer that the design of the Smart Cart was
3 proprietary and was protected by the ‘374 Patent, among other patents.

4 30. In or about March 2015 dbest shipped an additional product sample to
5 Scott Briechle that was marked with the ‘374 Patent and bore the SMART CART
6 mark. Throughout the months of March 2015 through December 2015 dbest
7 provided to Defendants mock-ups, and the parties discussed customization options,
8 shipping and prices as dbest and Defendants were negotiating the order for the
9 custom Smart Cart products. On or about December 14, 2015, Scott Briechle
10 indicated to dbest that he wished to sit down with dbest at the upcoming 2016
11 CHA Show “to see if we can find a way to partner”. Despite of these
12 representations a meeting never happened, but instead, to the dismay of dbest,
13 Defendants displayed the Knockoff Totes in the ArtBin booth at the 2016 CHA
14 Show, advertised the Knockoff Totes in its brochures and took pre-orders for the
15 Knockoff Totes in blatant disregard of dbest’s rights.

16 31. Plaintiff is informed and believes and based thereon alleges that with
17 full knowledge of the proprietary rights of dbest in and to the Smart Cart products
18 and the ‘374 Patent, Defendants have been, and currently are manufacturing,
19 producing, importing, distributing, offering for sale and selling the Knockoff Carts,
20 or Defendants are contributing to, or having the Knockoff Totes manufactured,
21 produced, imported, distributed, offered for sale or sold.

22
23 **FIRST CAUSE OF ACTION**

24 (Patent Infringement, 35 U.S.C. § 271)

25 32. Plaintiff repeats, realleges and incorporates by reference, as though
26 fully set forth herein, the allegations contained in Paragraphs 1 – 31, above.

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 33. On May 14, 2013, the ‘374 Patent issued for “LIGHTWEIGHT HIGH
2 LOAD CAPACITY FOLDING UTILITY CART WITH UNIQUE SUPPORT
3 STRUCTURE AND ERGONOMIC HANDLE”.

4 34. dbest has acquired and duly owns all right, title and interest in the
5 ‘374 Patent by virtue of proper assignment, including the right to sue and recover
6 for infringement thereof. During the period of May 14, 2013 through February 17,
7 2016, dbest was the exclusive licensee of the ‘374 Patent with the right to sue and
8 recover for the infringement of the ‘374 Patent.

9 35. The ‘374 Patent is in full force and effect.

10 36. dbest has been advertising, promoting, distributing, producing,
11 importing, offering for sale and selling products which practice the art disclosed in
12 the ‘374 Patent.

13 37. dbest has properly marked its products with the Patent Number
14 8,439,374 after the date the ‘374 Patent issued. dbest had been properly marking its
15 products with the designation “Patent Pending” while its application that matured
16 into the ‘374 Patent was pending.

17 38. Plaintiff is informed and believes, and based thereon alleges that
18 Defendants, and each and every one of them, have notice of dbest’s rights in the
19 ‘374 Patent.
20

21 39. Defendants, and each and every one of them, have infringed the ‘374
22 Patent by manufacturing, using, importing, distributing, advertising, offering to sell
23 and/or selling Knockoff Totes embodying the invention claimed in the ‘374 Patent
24 in the United States, or by supplying infringing products to others to use, thereby
25 inducing and/or contributing to the infringement of the ‘374 Patent.

26 40. Plaintiff is informed and believes, and based thereon alleges that the
27 individuals who are the controlling parties of ArtBin and/or Flambeau, and each of
28 them, have personally decided, directed, contributed to and induced the infringing

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 activities of the Defendants infringing the ‘374 Patent with actual knowledge of the
2 ‘374 Patent by manufacturing, producing, importing, promoting, distributing,
3 using, offering for sale and selling the Knockoff Totes and/or causing or inducing
4 those to be manufactured, produced, imported, promoted, distributed, used, offered
5 for sale and/or sold.

6 41. As a direct and proximate result of the foregoing acts of Defendants,
7 dbest has suffered, and is entitled to, monetary damages in an amount to be
8 determined at trial, including, without limitation, all profits lost by Plaintiff as a
9 result of Defendants’ unlawful activities, all of Defendants’ profits from their sale
10 of the Knockoff Totes including any and all profits from convoyed sales, but at a
11 minimum, Plaintiff is entitled to a reasonable royalty for all sales of the Knockoff
12 Carts. dbest is also entitled to its costs of suit and pre- and postjudgment interest.

13 42. Plaintiff is informed and believes, and based thereon alleges that
14 Defendants’ acts were in conscious and willful disregard for dbest’s rights, and
15 Defendants have been and presently are engaged in willful and deliberate
16 infringement of the ‘374 Patent.

17 43. Defendants’ willful infringement of the ‘374 Patent and the resulting
18 damage to dbest is such as to warrant the trebling of damages in order to provide
19 just compensation.

20 44. Defendants’ continuing infringement has inflicted, and unless
21 enjoined by this Court, will continue to inflict great and irreparable harm upon
22 dbest. dbest has no adequate remedy at law. Plaintiff is entitled to preliminary and
23 permanent injunctions enjoining Defendants from engaging in further acts of
24 infringement.

25 45. Plaintiff is informed and believes, and based thereon alleges that this
26 case is exceptional under 35 U.S.C. § 285 and Plaintiff is entitled to a recovery of
27 their reasonable attorneys’ fees and costs.
28

SECOND CAUSE OF ACTION

(Trade Dress Infringement, 15 U.S.C. § 1051, *et seq.*)

1
2
3 46. Plaintiff repeats, realleges and incorporates by reference, as though
4 fully set forth herein, the allegations contained in Paragraphs 1 – 31, above.

5 47. Since at least October 2010, and prior to the acts of Defendants
6 complained of herein, dbest has continuously manufactured, produced, imported,
7 advertised, marketed, distributed, offered for sale and sold in interstate commerce
8 the lightweight, high load capacity folding utility carts under the distinctive
9 trademark “SMART CART”. To the best of dbest’s knowledge, at the time it was
10 first introduced in 2010 and throughout the years since then, the Smart Cart has
11 been a unique product configuration in the market of collapsible carts.

12 48. The Smart Cart is characterized by its distinctive shape, style and
13 overall appearance and design. The Smart Cart is further characterized by its
14 outstanding quality, design, materials of construction, workmanship, performance,
15 reliability and durability. The Smart Cart has been featuring the same overall
16 appearance, look and feel for over five years, since at least as early as October
17 2010.

18 49. As set forth above, the shape, style, overall appearance and design of
19 the Smart Cart is unique, ornamental and non-functional. dbest has acquired trade
20 dress rights in the Smart Cart.

21 50. The Smart Cart Trade Dress is inherently distinctive or has acquired
22 secondary meaning with the trade and the consuming public and/or has become
23 distinctive in the minds of customers in that this shape, style, overall appearance
24 and design is associated with dbest and the Smart Cart Trade Dress is recognized
25 by customers as one emanating from, or endorsed by dbest.

26 51. dbest has manufactured, produced, imported, advertised, marketed,
27 distributed and promoted its Smart Cart and related products so that the public
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 associates them with the idea of outstanding quality, design, materials,
2 workmanship, performance, reliability and durability. In furtherance of that goal,
3 dbest usually displays its products and the associated trademarks in its advertising
4 and promotional presentations.

5 52. To date, dbest has spent substantial amounts of money annually
6 advertising and promoting its “SMART CART” mark, the Smart Carts and related
7 products, and had substantial annual sales of the Smart Carts and related products.

8 53. Defendants, and each and every one of them, have manufactured,
9 produced, imported, promoted, marketed, advertised, distributed, offered for sale
10 and/or sold commercially in interstate commerce in the United States the Knockoff
11 Totes, some of which are shown by way of example in EXHIBIT 4.

12 54. The Knockoff Totes bear a shape, style, overall appearance and design
13 that is the same as, or confusingly similar to, the Smart Cart Trade Dress sold
14 under the “SMART CART” mark. Defendants’ promotion, marketing, advertising,
15 distribution, offer for sale and/or sale of the Knockoff Totes is likely to cause
16 confusion, and on information and belief, has caused confusion that the Knockoff
17 Totes are made by, emanate from, sponsored by, associated with or affiliated with
18 dbest, because the Knockoff Totes have a shape, style, overall appearance and
19 design that is the same as or confusingly similar to that of the Smart Cart.
20

21 55. Defendants’ use of the shape, style, overall appearance and design of
22 the Knockoff Totes is without the permission of dbest. Defendants’ unauthorized
23 use is with the knowledge that the shape, style, overall appearance and design of
24 the Knockoff Totes are confusingly similar to dbest’s Smart Cart Trade Dress,
25 which has previously been and is being used by dbest.

26 56. Plaintiff is informed and believes and based thereon alleges that
27 Defendants had knowledge of the Smart Cart and the considerable commercial
28 success it has achieved. Plaintiff is further informed and believes and based

1 thereon alleges that Defendants, and each of them, willfully and with conscious
2 disregard for dbest's trade dress rights in the Smart Cart product design,
3 manufactured, produced, imported, promoted, marketed, advertised, distributed,
4 offered for sale and/or sold commercially in interstate commerce in the United
5 States the Knockoff Totes that are colorable imitations of dbest's trade dress in the
6 product configuration of the Smart Cart.

7 57. Defendants' acts set forth above constitute trade dress infringement of
8 dbest's trade dress in violation of the Lanham Act, 15 U.S.C. § 1051 *et seq.*, to the
9 substantial and irreparable injury of the public and of dbest's business reputation
10 and goodwill.

11 58. As a result of their infringing and unlawful acts, Defendants have
12 been, and continue to be, unjustly enriched by profits that Defendants have made in
13 connection with the manufacturing, importation, promotion, marketing,
14 advertising, distribution, offer for sale and/or sale of the Knockoff Totes that bear a
15 shape, style, overall appearance and design that is the same or confusingly similar
16 to the Smart Cart Trade Dress sold under the "SMART CART" mark.

17 59. Defendants' continuing infringement has inflicted, and unless
18 enjoined by this Court, will continue to inflict great and irreparable harm upon
19 Plaintiff. Plaintiff has no adequate remedy at law. Plaintiff is entitled to a
20 preliminary and permanent injunction enjoining Defendants from engaging in
21 further acts of infringement.
22

23 60. As a direct and proximate result of the foregoing acts of Defendants,
24 dbest has suffered, and is entitled to, monetary damages in an amount to be
25 determined at trial. dbest is also entitled to its costs of suit, including its reasonable
26 attorneys' fees, and pre- and postjudgment interest.

27 61. Plaintiff is informed and believes and based thereon alleges that
28 Defendants' acts were willful, in conscious disregard for dbest's trade dress rights

1 in the Smart Cart Trade Dress, and the resulting damage to Dbest is such as to
2 warrant the trebling of damages in order to provide just compensation.

3 **THIRD CAUSE OF ACTION**

4 (False Designation of Origin, 15 U.S.C. § 1125)

5 62. Plaintiff repeats, realleges and incorporates by reference, as though
6 fully set forth herein, the allegations contained in Paragraphs 1 – 31 and 47 – 61,
7 above.

8 63. dbest owns and enjoys trade dress rights in the Smart Cart, which
9 trade dress rights are superior to any rights that Defendants may claim in the
10 product configuration of the Knockoff Totes. The Smart Cart Trade Dress is non-
11 functional, and is inherently distinctive or has acquired secondary meaning with
12 the trade and consumers and/or has become distinctive in the minds of customers
13 in that the Smart Cart Trade Dress is recognized as emanating from, made or
14 sponsored by, affiliated or associated with dbest.

15 64. Plaintiff is informed and believes and based thereon alleges that
16 Defendants have used and are using the shape, style, overall appearance and design
17 of Knockoff Totes to promote, market and sell their Knockoff Totes with the intent
18 of passing off and confusing the customers into believing that Knockoff Totes are
19 the same as, originates with, sponsored by, affiliated or associated with dbest.
20

21 65. By manufacturing, producing, importing, promoting, marketing,
22 advertising, distributing, offering for sale and/or selling the Knockoff Totes that
23 have a shape, style, overall appearance and design that is the same or confusingly
24 similar to that of dbest's Smart Cart, Defendants have infringed on dbest's trade
25 dress rights in the Smart Cart in violation of Section 43(a) of the Lanham Act, 15
26 U.S.C. § 1125(a). Defendants' acts set forth above further constitute false
27 designation of origin, false description, false representation, and unfair competition
28 in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), as such acts

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 are likely to deceive customers and prospective customers into believing that
2 Knockoff Totes are from or sponsored by dbest and, as a consequence, are likely to
3 divert and have diverted customers away from dbest.

4 66. Unless enjoined by this Court, Defendants will continue to sell the
5 Knockoff Totes in commerce in the United States, and the Knockoff Totes will be
6 viewed as having emanated from dbest. dbest, however, has no control over the
7 nature and quality of the Knockoff Totes so rendered, and any fault or objection
8 with the Knockoff Totes will adversely affect future sales by dbest of the Smart
9 Cart under the trade dress dbest has in the product design.

10 67. As a result of their infringing and unlawful acts, Defendants have
11 been, and continue to be, unjustly enriched by profits that Defendants have made in
12 connection with the manufacturing, importation, promotion, marketing,
13 advertising, distribution, offer for sale and/or sale of the Knockoff Totes that bear a
14 shape, style, overall appearance and design that is the same or confusingly similar
15 to the Smart Cart Trade Dress.

16 68. Defendants' continuing infringement has inflicted, and unless
17 enjoined by this Court, will continue to inflict great and irreparable harm upon
18 Plaintiff. Plaintiff has no adequate remedy at law. Plaintiff is entitled to a
19 preliminary and permanent injunction enjoining Defendants from engaging in
20 further acts of infringement.

21 69. As a direct and proximate result of the foregoing acts of Defendants,
22 dbest has suffered, and is entitled to, monetary damages in an amount to be
23 determined at trial. dbest is also entitled to its costs of suit, including its reasonable
24 attorneys' fees, and pre- and postjudgment interest.

25 70. Plaintiff is informed and believes and based thereon alleges that
26 Defendants' acts were willful, in conscious disregard for dbest's trade dress rights
27
28

1 in the Smart Cart, and the resulting damage to dbest is such as to warrant the
2 trebling of damages in order to provide just compensation.

3 **FOURTH CAUSE OF ACTION**

4 (California Statutory Unfair Competition, Cal. Bus. & Prof. Code § 17200, *et seq.*)

5 71. Plaintiff repeats, realleges and incorporates by reference, as though
6 fully set forth herein, the allegations contained in Paragraphs 1 – 31, 47 – 61 and
7 63 – 70, above.

8 72. dbest owns and enjoys trade dress rights in the Smart Cart. The Smart
9 Cart Trade Dress is non-functional, and is inherently distinctive or has acquired
10 secondary meaning with the trade and consumers and/or has become distinctive in
11 the minds of customers in that the Smart Cart Trade Dress is recognized as
12 emanating from, made or sponsored by, affiliated or associated with dbest.

13 73. dbest has built valuable business reputation and goodwill in its trade
14 dress. Defendants’ manufacturing, producing, importing, promoting, marketing,
15 advertising, distributing, offering for sale and/or selling of the Knockoff Carts, that
16 have a shape, style, overall appearance and design that is the same or confusingly
17 similar to that of dbest’s Smart Cart Trade Dress, is likely to and does permit
18 Defendants to trade upon the goodwill of dbest’s Smart Cart Trade Dress and to
19 confuse the public regarding a connection or affiliation between dbest and
20 Defendants.

21 74. Defendants’ aforementioned conduct results in damage to dbest’s
22 goodwill and business reputation and unjustly enriches the Defendants.

23 75. By manufacturing, producing, importing, promoting, marketing,
24 advertising, distributing, offering for sale and/or selling the Knockoff Totes that
25 have a shape, style, overall appearance and design that is the same or confusingly
26 similar to that of dbest’s trade dress, Defendants mislead others, and will continue
27
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 to mislead others into assuming there is a connection between Defendants and
2 dbest.

3 76. Defendants’ use of the Knockoff Totes that bear the same or a
4 confusingly similar shape, style, overall appearance and design to that of dbest’s
5 Smart Cart Trade Dress, was and is without the consent of dbest.

6 77. Defendants’ manufacturing, producing, importing, promoting,
7 marketing, advertising, distributing, offering for sale and/or sale of the Knockoff
8 Totes, that has a shape, style, overall appearance and design that is the same or
9 confusingly similar to that of dbest’s trade dress, constitutes unfair competition in
10 violation of § 17200, *et seq.*, of the California Business and Professions Code.

11 78. Plaintiff is informed and believes, and based thereon alleges that,
12 unless enjoined by this Court, Defendants will continue to infringe dbest’s trade
13 dress and monetary compensation will not be adequate relief for dbest for the
14 damage to its trade dress in the public’s eye. Plaintiff is entitled to preliminary and
15 permanent injunction enjoining Defendants from engaging in further acts of
16 infringement.

17 79. As a result of their acts complained of herein, Defendants have been,
18 and will continue to be unjustly enriched by profits they made in connection with
19 manufacturing, producing, importing, promoting, marketing, advertising,
20 distributing, offering for sale and/or selling the Knockoff Totes that bear a shape,
21 style, overall appearance and design that is the same or confusingly similar to that
22 of dbest’s Smart Cart Trade Dress.
23

24 **FIFTH CAUSE OF ACTION**

25 (Common Law Trademark Infringement)

26 80. Plaintiff repeats, realleges and incorporates by reference, as though
27 fully set forth herein, the allegations contained in Paragraphs 1 – 31, 47 – 61 and
28 63 – 70, above.

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 81. dbest has continuously used and promoted its trade dress in the Smart
2 Cart. By way of dbest's continuous use and promotion of its trade dress, as well as
3 the distinctiveness of the trade dress, customers recognize and associate dbest's
4 trade dress as representing a single, even if anonymous, source or sponsor of
5 goods, and therefore dbest's trade dress in the Smart Cart is a protectable
6 trademark at common law.

7 82. dbest owns and enjoys common law trademark rights in the overall
8 commercial impression and presentation of its Smart Cart, which rights are
9 superior to any rights that Defendants may claim in and to any trademark with
10 respect to the Knockoff Totes. dbest's trade dress is non-functional, ornamental,
11 inherently distinctive and/or has acquired secondary meaning with the trade and
12 customers and/or has become distinctive in the minds of customers in that the
13 overall appearance and design of the Smart Cart is associated with Dbest.

14 83. Defendants have used the Knockoff Totes that bear a confusingly
15 similar appearance to the Smart Cart. Defendants' use of a similar appearance for
16 the Knockoff Totes has created a likelihood of confusion in the trade and among
17 the consuming public as to the source of the Knockoff Totes.

18 84. The manufacturing, producing, importing, promoting, marketing,
19 advertising, distributing, offering for sale and/or sale by Defendants of the
20 Knockoff Totes throughout the United States is likely to cause confusion and,
21 Plaintiff is informed and believes, and based thereon alleges, that it has caused
22 confusion as to the source of the Knockoff Totes in that purchasers of the
23 Knockoff Totes will be likely to associate or have associated such products as
24 originating with dbest, all to the detriment of dbest.

25 85. By reason of Defendants' actions alleged herein, dbest has suffered,
26 and will continue to suffer, irreparable injury to its rights and suffer substantial loss
27
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURENAN BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 of goodwill and in the value of its trade dress unless and until Defendants are
2 enjoined from continuing their wrongful acts.

3 86. Plaintiff is informed and believes, and based thereon alleges that
4 Defendants' conduct in this cause of action is willful, wanton, malicious,
5 oppressive, and in conscious disregard for dbest's rights in its Smart Cart Trade
6 Dress, justifying the imposition of punitive and exemplary damages under
7 California Civil Code § 3294.

8 **SIXTH CAUSE OF ACTION**

9 (Common Law Unfair Competition)

10 87. Plaintiff repeats, realleges and incorporates by reference, as though
11 fully set forth herein, the allegations contained in Paragraphs 1 – 31, 47 – 61 and
12 63 – 70, above.

13 88. The manufacturing, producing, importing, promoting, marketing,
14 advertising, distributing, offering for sale and/or sale by Defendants of the
15 Knockoff Totes throughout the United States is likely to cause confusion, to cause
16 misrepresentation, to cause mistake, and/or to deceive the public as to the
17 affiliation, approval, sponsorship, or connection between Defendants and dbest and
18 constitute unfair competition at common law.

19 89. By reason of Defendants' actions in connection with the Knockoff
20 Totes, dbest has suffered, and will continue to suffer, irreparable injury to its rights
21 and suffer substantial loss of goodwill and in the value of its trade dress unless and
22 until Defendants are enjoined from continuing their wrongful acts.

23 90. By reason of Defendants' actions in connection with the Knockoff
24 Totes, dbest has been damaged in an amount not presently ascertained, and such
25 damage will continue to increase unless and until Defendants are enjoined from
26 continuing their wrongful acts.
27
28

1 91. Plaintiff is informed and believes, and based thereon alleges that
2 Defendants’ conduct in this cause of action is willful, wanton, malicious,
3 oppressive, and in conscious disregard for dbest’s rights in its Smart Cart Trade
4 Dress, justifying the imposition of punitive and exemplary damages under
5 California Civil Code § 3294.

6 **PRAYER FOR RELIEF**

7 WHEREFORE, Plaintiff respectfully prays for judgment against Defendants
8 as follows:
9

10 1. That this Court adjudge that the ‘374 Patent is valid and enforceable
11 and in full force and effect;

12 2. That this Court adjudge that the Smart Cart Trade Dress is valid and
13 enforceable and in full force and effect;

14 3. That this Court adjudge that Defendants, and each of them, have
15 literally infringed the ‘374 Patent, and for that infringement this Court award
16 Plaintiff all of Plaintiff’s lost profits as a result of such infringement, and all of
17 Defendants’ profits as a result of Defendants’ sales of the Knockoff Totes
18 including, without limitation, any and all profits from convoyed sales, and not less
19 than a reasonable royalty on the sale of all of the Knockoff Totes resulting from
20 such infringement;

21 4. That this Court adjudge that Defendants, and each of them, have
22 infringed the ‘374 Patent under the Doctrine of Equivalents, and for that
23 infringement this Court award Plaintiff all of Plaintiff’s lost profits as a result of
24 such infringement, and all of Defendants’ profits as a result of Defendants’ sales of
25 the Knockoff Totes including, without limitation, any and all profits from
26 convoyed sales, and not less than a reasonable royalty on the sale of all of the
27 Knockoff Totes resulting from such infringement;
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 5. That this Court adjudge that Defendants, and each of them, by virtue
2 of the manufacture, production, importation, use and sale of the Knockoff Totes
3 have contributed to the infringement of or induced the infringement of the ‘374
4 Patent, and for that infringement this Court award Plaintiff all of Plaintiff’s lost
5 profits as a result of such infringement, and all of Defendants’ profits as a result of
6 Defendants’ sales of the Knockoff Totes including, without limitation, any and all
7 profits from conveyed sales, and not less than a reasonable royalty on the sale of
8 all of the Knockoff Totes resulting from such infringement;

9 6. That this Court issue a preliminary and then a permanent injunction
10 enjoining Defendants, their officers, directors, agents, servants, employees,
11 attorneys, confederates, parents, subsidiaries and divisions, and all persons and/or
12 entitites acting for, with, by, through, or in concert or participation with them from:

13 (a) infringing the ‘374 Patent, either directly or indirectly;

14 (b) inducing others to infringe the ‘374 Patent;

15 (c) manufacturing, producing, importing, advertising, promoting,
16 marketing, distributing, offering for sale and/or selling the Knockoff Totes;

17 (d) using dbest’s Smart Cart Trade Dress and/or any other designation
18 that is a colorable imitation of and/or is confusingly similar to dbest’s Smart Cart
19 Trade Dress in connection with the manufacturing, producing, importing,
20 advertising, promoting, marketing, distributing, offering for sale and/or selling a
21 lightweight collapsible cart neither originating from nor authorized by Plaintiff;

22 (e) representing in any manner, or by any method whatsoever, that
23 goods, services, or other products provided by the Defendants originate from,
24 affiliated or associated with, approved or authorized or sponsored by Plaintiff, or
25
26
27
28

1 otherwise taking any action likely to cause confusion, mistake, or deception as to
2 the origin, approval, sponsorship or certification of such goods or services;

3 (f) infringing the distinctive quality of the Smart Cart Trade Dress;

4 (g) unfairly competing with Plaintiff in any manner;

5
6 7. That this Court order that Defendants deliver up to the Court any and
7 all Knockoff Totes in their possession, custody and/or control that infringe the ‘374
8 Patent and/or dbest’s Smart Cart Trade Dress and to serve a copy of such list on
9 Plaintiff’s attorneys;

10 8. That this Court order that Defendants deliver up to the Court any and
11 all documents reflecting or relating to the manufacture, importation, production,
12 purchase, distribution and/or sale of any Knockoff Totes that infringe the ‘374
13 Patent and/or dbest’s Smart Cart Trade Dress and to serve a copy of such list on
14 Plaintiff’s attorneys;

15 9. That this Court order that Defendants deliver up to the Court all
16 products, containers, packages, labels, literature, catalogs, signs, advertising
17 material, and the like bearing dbest’s Smart Cart Trade Dress and/or a shape, style,
18 overall appearance and design that is confusingly similar to dbest’s Smart Cart
19 Trade Dress, together with all plates, molds and other means of making the same;

20 10. That this Court order that Defendants, within thirty (30) days after
21 service of judgment with notice of entry thereof upon them, be required to file with
22 the Court and serve upon Plaintiff’s attorneys a written report, under oath, setting
23 forth in detail the manner in which Defendants have complied with paragraphs 1-8,
24 above;

25 11. That this Court order that Defendants account for and pay over to
26 Plaintiff their profits and cumulative damages sustained by Plaintiff by reason of
27
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 Defendants’ unlawful acts of patent infringement, trade dress infringement, unfair
2 competition and trademark infringement herein alleged;

3 12. That this Court order disgorgement and/or restitution of Defendants’
4 profits to Plaintiff;

5 13. That this Court award Plaintiff its reasonable costs of suit and
6 attorneys’ fees;

7 14. That the present case be found exceptional and that attorneys’ fees be
8 awarded to Plaintiff under 35 U.S.C. § 285;

9 15. That this Court award to Plaintiff enhanced damages up to three times
10 their amount as provided by law, against Defendants to punish Defendants for their
11 malicious and oppressive actions of willful and deliberate violation of Plaintiff’s
12 patent rights in the ‘374 Patent;

13 16. That this Court award to Plaintiff enhanced damages up to three times
14 their amount as provided by law, against Defendants to punish Defendants for their
15 malicious and oppressive actions of willful and deliberate violation of Plaintiff’s
16 trademark rights in the Smart Cart Trade Dress;

17 17. That this Court award Plaintiff punitive damages;

18 18. That this Court award Plaintiff pre- and postjudgment interest on its
19 damages; and
20

21 //

22 //

23 //

24 //

25

26

27

28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAU BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

1 19. That this Court award Plaintiff such other and further relief as the
2 Court may deem just and proper.

3
4
5
6 Dated: March 2, 2016

ROZSA LAW GROUP L.C.

7
8 By: /s/ Thomas I. Rozsa
9 Thomas I. Rozsa
10 Zsofia Nemeth
11 Attorneys for dbest products Inc.

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BUREAK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990

DEMAND FOR JURY TRIAL

1
2
3 Plaintiff dbest products Inc. hereby demands that all claims or causes of
4 action raised in this Complaint be tried by a jury to the fullest extent possible under
5 the United States and California Constitutions, statutes and laws.
6

7 Respectfully submitted:

8
9 Dated: March 2, 2016

ROZSA LAW GROUP L.C.

10 By: /s/ Thomas I. Rozsa

11 Thomas I. Rozsa

12 Zsofia Nemeth

ROZSA LAW GROUP L.C.

13 18757 Burbank Boulevard, Suite 220

14 Tarzana, California 91356

15 Tel. (818) 783-0990

16 Fax (818) 783-0992

E-mail: counsel@rozsalaw.com

17 Attorneys for dbest products Inc.
18
19
20
21
22
23
24
25
26
27
28

ROZSA LAW GROUP LC
ATTORNEYS AT LAW
18757 BURBANK BOULEVARD, SUITE 220
TARZANA, CALIFORNIA 91356-3346
TELEPHONE (818) 783-0990