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Attorneys for Plaintiffs,
Eli Zhadanov and Interlink Products International, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ELI ZHADANOV and INTERLINK
PRODUCTS INTERNATIONAL, INC.,

Plaintiffs,

v.

WATER PIK, INC.,

Defendant.

Case No:

**COMPLAINT &
JURY TRIAL DEMAND**

Plaintiffs, Eli Zhadanov and Interlink Products International, Inc. (“Interlink”) (collectively, “Plaintiffs”), by and through their undersigned attorney, hereby complain of Defendant, Water Pik, Inc. (“Defendant”), as follows:

THE PARTIES

1. Eli Zhadanov is an individual residing at 2944 W. 5th Street, Brooklyn, New York 11224.
2. Interlink is a New Jersey corporation with its principal place of business at 1315 East Elizabeth Avenue, Linden, New Jersey 07036.

3. On information and belief, Defendant is a Delaware corporation with its principal place of business at 1730 E. Prospect Road, Fort Collins, Colorado 80553.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the claims alleged pursuant to 28 U.S.C. §§ 1331 and 1338.

5. This Court has personal jurisdiction over Defendant in that it does business regularly in this district and the claims at issue in this case arise out of or are related to Defendant's business activities with respect to this district. Defendant regularly offers for sale, ships and sells showerhead products to customers located in New Jersey, including, on information and belief, the product that is the subject of the infringement allegations in this Complaint. Defendant also regularly places such products into the stream of commerce through established relationships with retailers selling its products in New Jersey and with full awareness that substantial quantities of such products will be sold in New Jersey. Defendant thus purposely directs its business activities to this forum and the claims herein thereby arise out of and relate to such business activities.

6. Venue is proper in this district pursuant to 28 U.S.C. §§ 1400(b) and 1391(b) and (c).

CLAIM FOR INFRINGEMENT OF U.S. PATENT NO. D680,619

7. Interlink, is a New Jersey based research & development company specializing in the development, manufacturing and marketing of innovative consumer and professional healthcare products in the shower and bath, personal care and cleaning categories. The company was founded in 1996 and built on conceptual and technological innovation, high product quality and excellence in customer service.

8. Interlink's products include several lines of showerheads that can be purchased from various retailers both in stores and online.

9. Defendant competes directly with Interlink in the wholesale and retail showerhead markets. Defendant sells dual showerhead products under the trademark WATERPIK.

10. On April 23, 2013, United States Letters Patent No. D680,619 ("the '619 Patent") were issued to Eli Zhadanov, Interlink's majority shareholder. A copy of the '619 Patent is attached as Exhibit A. In general terms, the '619 Patent claims an ornamental design for the handle of a handheld showerhead with a switch moveable within a recessed area on the handle.

11. Interlink is the exclusive licensee of the '619 Patent.

12. Without Plaintiffs' authorization, Defendant has made, used, sold, offered to sell and/or imported in the United States and is still is making, using, selling, offering to sell, and/or importing in the United States at least one handheld showerhead bearing a design that has the same or substantially similar overall visual impression as the design covered by the '619 Patent. A comparison of the infringing handheld showerhead in Waterpik dual showerhead model VLL-133-663VB with the design reflected in the '619 Patent is set forth in Table 1 below.

TABLE 1	
U.S. Pat. No. D680,619	Waterpik Model VLL-133-663VB
 <p data-bbox="548 709 609 735">FIG. 2</p>	
 <p data-bbox="527 1486 587 1512">FIG. 1</p>	

13. On information and belief, Defendant's infringement has been intentional and willful, making this an exceptional case.

14. Defendant's infringement is ongoing and has injured and will continue to injure Plaintiffs unless and until this Court enters an injunction prohibiting further infringement, including enjoining further sale of Defendant's infringing products.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment in their favor and against Defendant and its subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with Defendant, granting the following relief:

- A. An award of damages sufficient to compensate Plaintiffs for Defendant's infringement of the '619 Patent, including Interlink's lost profits and/or reasonable royalties for the infringement, and any other relief provided for under 35 U.S.C. § 284, together with prejudgment interest from the date that Defendant's infringement of the '619 Patent began;
- B. Increased damages as permitted under 35 U.S.C. § 284;
- C. A finding that this case is exceptional and an award to Interlink of its attorneys' fees and costs as provided by 35 U.S.C. § 285;
- D. A preliminary and permanent injunction prohibiting further infringement of the '619 Patent; and
- E. Such other and further relief as this Court or a jury may deem proper and just.

Dated: March 30, 2016

Respectfully submitted,

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DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38(b), Plaintiff demands a trial by jury on all issues triable by jury.

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CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 11.2

The undersigned hereby certifies that, to the best of his knowledge, this matter is not the subject of any other action pending in any court, or any pending or contemplated arbitration or administrative proceeding.

Dated: March 30, 2016

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