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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 LED OUTFITTERS INC., a New York
19 Corporation

20 Defendant.

Case No. 2:16-cv-3127

**COMPLAINT FOR INFRINGEMENT
OF UNITED STATES PATENTS
NO. D627,672 AND D614,986**

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 LED Outfitters Inc. ("Defendant"), a New York
24 corporation, is infringing U.S. Design Patent D627,672 ("the '672 patent") and U.S.
25 Design Patent D614,986 ("the '986 patent")(collectively, "the Mega patents"), by
26 selling, and offering to sell, in this judicial district, light bars that infringe the Mega
27 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 is a New York corporation, and has a place of business in
10 Great Neck, New York.

11 6. On November 23, 2010, the U.S. Patent and Trademark Office duly and
12 lawfully issued the '672 patent under the title *Warning Light Lens*. A true and
13 correct copy of the '672 patent is attached hereto as **Exhibit A**.

14 7. On May 4, 2010, the U.S. Patent and Trademark Office duly and
15 lawfully issued the '986 patent under the title *Mirrored Light Bar Set For*
16 *Emergency Vehicles*. A true and correct copy of the '986 patent is attached hereto as
17 **Exhibit B**.

18 8. Defendant has infringed the Mega patents by selling, and offering to
19 sell, in this judicial district and elsewhere in the United States, light bars with
20 warning light lenses covered by the single claim of the Mega patent. Defendant's
21 offers to sell and sale, in this judicial district, of Lights Bars, specifically models:
22 12" Linear Mini Lightbar, Code: 12MINILIN; 27" Saber Linear Mini Lightbar,
23 Code: 27MINI LINEAR; 30" Razor Mini Lightbar Linear, Code: 30RZLIN; 40"
24 Razor Linear Lightbar, Code: 40RAZORlin; 60" Saber Rex Linear Tow
25 Truck/Wrecker Lightbar, Code: 60LINEARLIGHTBAR; 20" Razor Mini Lightbar
26 Linear, Code: 20razorlinear; Infiltrator Series 2 Head Linear Dash Light, Code:
27 2HEADINFL; 48" Saber Linear LED Light bar, Code: 0138; 55" Saber Rex Linear
28 LED Light bar, Code: 007; Infiltrator Series 4 Head Linear Warning Bar, Code:

1 Code: 4HEADINFL; Infiltrator Series 6 Head Linear Warning Bar, Code:
2 6HEADINFL; and Infiltrator Series 8 Head Linear Warning Bar, Code:
3 8HEADINFL, are infringing the '672 patent. Defendant's offers to sell and sale, in
4 this judicial district, of Lights Bars, specifically models: Damega Eco Interior
5 Lightbar Code: VZ3000, are infringing the '986 patent. Images and a spreadsheet of
6 Defendant's infringing products are attached hereto as **Exhibit C**.

7 9. Upon information and belief, Defendant has derived, and will continue
8 to derive, and receive from the above infringement, gains, profits, and advantages in
9 an amount not presently known to Mega.

10 10. Defendant's infringement of the Mega patents has damaged Mega in an
11 unknown amount. These damages continue to grow as Defendant's infringement
12 continues. Under Sections 284 and 289 of Title 35 of the United States Code, Mega
13 seeks damages adequate to compensate for this infringement in an amount not less
14 than Defendant's total profit from sales of the infringing products, together with
15 interest and costs affixed by the Court.

16 **PRAYER FOR RELIEF**

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

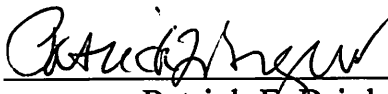
- 20 1. An order, pursuant to 35 U.S.C. Section 271, declaring that Defendant
21 has infringed the single claim of the '672 patent and the single claim of the '986
22 patent;
- 23 2. An award of the actual damages Mega has suffered by reason of the
24 infringement charged in this Complaint, in an amount not less than the total profits
25 from Defendant's sales of the products charged with infringing the Mega patents;
- 26 3. An award to Plaintiff Mega of its costs of suit herein; and
- 27 4. Such other and further relief as the Court may deem just and proper.
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Dated: May 5, 2016

Respectfully submitted,

WAGNER, ANDERSON & BRIGHT PC

By:  _____

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: May 5, 2016

Respectfully submitted,
WAGNER, ANDERSON & BRIGHT PC

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