

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

)	
CELEBRITY SIGNATURES)	
INTERNATIONAL, INC., a Delaware)	
corporation;)	
)	Case No. 06-0415-CV-W-HFS
Plaintiff,)	
)	JURY TRIAL DEMANDED
v.)	
)	
THE JON RENAU COLLECTION INC.,)	
d/b/a JON RENAU, a California corporation;)	
)	
Defendant.)	
)	
)	
_____)	
)	

COMPLAINT AND DEMAND FOR JURY TRIAL

COME NOW, plaintiff Celebrity Signatures International, Inc. (hereinafter "Plaintiff" or "Celebrity Signatures") for its complaint against defendant The Jon Renau Collection, Inc., d/b/a Jon Renau (herinafter "Defendant" or "Jon Renau") and state as follows:

1. This is an action for patent infringement and for damages under the United States Patent law 35 U.S.C. § 271 et. seq.

THE PARTIES

2. Plaintiff Celebrity Signatures International, Inc. is a corporation organized and existing under the laws of the State of Delaware, with its principal office located at 5900 Equitable Road, Kansas City, MO 64120.

3. Upon information and belief, Defendant The Jon Renau Collection, Inc., d/b/a Jon Renau, is a for-profit corporation organized and existing under the laws of the State of

California, with its principal office located at 2510 Island View Way; Vista, CA 92081. Upon further information and belief, Defendant is in the business of selling products in interstate commerce, including sales in the State of Missouri and this District.

JURISDICTION AND VENUE

4. The Court may exercise subject matter jurisdiction over the claims set forth in this complaint pursuant to 28 U.S.C. § 1338.

5. The Court may exercise personal jurisdiction over Defendant in this action on the grounds that, upon information and belief: (a) Defendant has committed acts of patent infringement in the State of Missouri; and (b) Defendant does business in the State of Missouri directly and through authorized distributors and dealers.

6. Service of process on Defendant in this action will be effected pursuant to Fed. R. Civ. P. 4(h).

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

FIRST CLAIM FOR RELIEF
(Patent Infringement)

8. On October 7, 2003, United States Letters Patent No. 6,629,536 was duly and legally issued to Teresa Lane for the invention "Hair Accessory" (hereinafter "the '536 Patent"). (A true and correct copy of the '536 Patent is attached hereto as Exhibit 1.)

9. Ms. Lane has assigned all rights, title, and interest in the '536 Patent to Celebrity Signatures. The assignment was recorded with the U.S. Patent & Trademark Office on May 17, 2001 under Reel 011808, Frame 0446. By virtue of the assignment, Celebrity Signatures is the owner of the '536 Patent and has the right to recover damages for past and future infringement thereof.

10. Celebrity Signatures is the manufacturer and supplier of products manufactured for the U.S. under the '536 Patent.

11. Defendant has infringed and continues to infringe the '536 Patent by making, using, selling, and/or importing products embodying the patented invention in violation of 35 U.S.C. §271(a), inducing others to make, use, sell, and/or import products embodying the patented invention in violation of 35 U.S.C. § 271(b), and/or by contributing to the manufacture, use, sale, and/or importation of products embodying the patented invention in violation of 35 U.S.C. § 271(c).

12. Defendant's infringement of the '536 Patent has caused Plaintiff monetary harm in an amount to be proved at trial. In addition, unless restrained, Defendant's continued infringement of the '536 Patent will cause Plaintiff irreparable harm for which there is no adequate remedy at law.

13. Plaintiff's products embodying the patented invention have properly been marked with references to the '536 Patent.

14. Upon information and belief, Defendant has known of the '536 Patent, but has continued to infringe the '536 Patent and thus has knowingly and willfully infringed the '536 Patent in disregard of Plaintiff's rights.

Prayer for Relief for First Claim

WHEREFORE, Plaintiff prays for (a) an order finding that Defendant has infringed the '536 Patent; (b) an accounting for and an award of damages, including lost profits, resulting from Defendant's infringement, and/or reasonable royalties for such infringement pursuant to 35 U.S.C. § 284; (c) a trebling of Plaintiff's damages pursuant to 35 U.S.C. § 284 because of the knowing, willful, and wanton nature of Defendant's conduct; (d) an assessment of interest, both

prejudgment and post judgment, on the damages awarded pursuant to 35 U.S.C. § 284; (e) a finding of this case to be exceptional and an award of attorneys' fees incurred by Plaintiff in this action pursuant to 35 U.S.C. § 285; (f) a preliminary and permanent injunction against Defendant and its parents, subsidiaries, divisions, agents, dealers, officers, employees, successors, and assigns, and all others acting in concert or participation with them from infringing the '536 Patent pursuant to 35 U.S.C. § 283; (g) an order directing that all goods in the possession, custody, or control of Defendant that infringe the '536 Patent be delivered up and destroyed within 30 days of entry of judgment; (h) an award of Plaintiff's costs in bringing and prosecuting this action pursuant to 35 U.S.C. § 284; and (i) such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

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

Respectfully submitted,

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