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Attorneys for Plaintiffs
Unilin Beheer B.V. and Flooring Industries, Ltd. Sarl

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 0:17-CV-60107

UNILIN BEHEER B.V., and
FLOORING INDUSTRIES, LTD.
SARL,

Plaintiffs,

v.

US WOOD FLOORING, INC., a
Florida Corporation; FLOORING
TRADING COMPANY LLC, a Florida
Limited Liability Company; WOOD
FLOOR LLC, a Florida Limited
Liability Company; NATAN SUSTIEL,
an individual; XINJIANG YANG, an
individual; PEIYING ZHU, an
individual; and DOES 1 to 25,

Defendants.

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

Plaintiffs allege the following:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §§ 1, *et seq.* for the infringement of U.S. Patent Nos. 6,874,292 (“the ’292 Patent”); 6,928,779

1 (“the ’779 Patent); 6,490,836 (“the ’836 Patent); 6,786,019 (“the ’019
2 Patent”); and 7,249,445 (“the ’445 Patent”).

3 4 **THE PARTIES**

5 2. Plaintiff Unilin Beheer B.V. (“Unilin”) is the owner of the ’292,
6 ’779, and ’836 Patents, and is a company organized under the laws of the
7 Netherlands with its principal place of business at 1 Beneluxstraat, 5061KD
8 Oisterwijk, The Netherlands.

9 3. Plaintiff Flooring Industries, Ltd. Sarl is the exclusive licensee
10 of the ’292, ’779, and ’836 Patents, and is the owner of the ’019 and ’445
11 Patents, and has its principal place of business at 10b Rue des Mérovingiens,
12 Zone Industrielle Bourmicht, Bertrange 8070, Luxembourg.

13 4. Upon information and belief, Defendant US Wood Flooring,
14 Inc. is a Florida corporation with its principal place of business at 3540 NW
15 56th Street, Suite 206, Fort Lauderdale, Florida 33309.

16 5. Upon information and belief, Defendant Flooring Trading
17 Company LLC is a Florida limited liability company with its principal place
18 of business at 2875 NE 191st Street, Suite 601, Aventura, Florida 33180.

19 6. Upon information and belief, Defendant Wood Floor LLC is a
20 Florida limited liability company with its principal place of business at 2875
21 NE 191st Street, Suite 601, Aventura, Florida 33180.

22 7. Upon information and belief, Defendants US Wood Flooring,
23 Inc., Flooring Trading Company LLC, and Wood Floor LLC are corporate
24 affiliates, continuations, successor entities, principals, co-conspirators, aiders
25 and abettors, and/or alter-egos; were at all times acting within the scope of
26 such affiliation, continuation, successor, co-conspirator, aider and abettor,
27 and/or alter-ego relationships; and actively participated in and/or
28 subsequently ratified and adopted each and all of the acts or conducts

1 alleged with full knowledge of all the facts and circumstances, including
2 with full knowledge of each and every wrongful act and conduct and
3 Plaintiffs' damages caused therefrom.

4 8. Upon information and belief, Defendant Natan Sustiel is an
5 individual who resides in Broward County, Florida.

6 9. Upon information and belief, Defendant Xinjiang Yang is an
7 individual who resides in Broward County, Florida.

8 10. Upon information and belief, Defendant Peiying Zhu is an
9 individual who resides in Broward County, Florida.

10 11. Upon information and belief, Defendants Sustiel, Yang, and
11 Zhu, in conjunction with DOES 1-25, jointly own, manage, and/or control
12 Defendants US Wood Flooring, Inc., Flooring Trading Company LLC, and
13 Wood Floor LLC. Defendants Sustiel, Yang, and Zhu, and DOES 1-25
14 import, distribute and sell products that infringe Plaintiffs' patents through
15 their alter-egos such as entities US Wood Flooring, Inc., Flooring Trading
16 Company LLC, and Wood Floor LLC, and DOES 1-25. Defendants
17 continue to sell such products through different fictitious entities to mask
18 their respective involvement in the unlawful importation, distribution and
19 sale of products that infringe Plaintiffs' patents.

20 12. Plaintiffs are informed and believe and thereon allege that some
21 of named defendants and DOES 1 through 25, inclusive, are importers,
22 vendors and distributors of products that infringe Plaintiffs' patents as
23 described below. The true names, whether corporate, individual or
24 otherwise, and capacities of the defendants sued herein as DOES 1 through
25 25 are presently unknown to Plaintiffs at this time, and therefore, Plaintiffs
26 sue said defendants by such fictitious names. Plaintiffs will seek leave to
27 amend this complaint to allege their true names and capacities when such
28 information has been ascertained. Plaintiffs are informed and believe, and

1 based thereon allege, that each of defendants designated as a DOE is
2 responsible in some manner for the events alleged herein and the damages
3 caused thereby. The named defendants and DOES 1-25 are collectively
4 referred to herein as "Defendants."

5 13. Plaintiffs are informed and believe and thereupon allege that at
6 all times relevant hereto each of the Defendants acted in concert with each
7 other; was the agent, affiliate, officer, director, manager, principal, alter-ego,
8 co-conspirator, aider and abettor, and/or employee of the remaining
9 defendants; was at all times acting within the scope of such agency,
10 affiliation, alter-ego and/or employment relationship; and actively
11 participated in and/or subsequently ratified and adopted each and all of the
12 acts or conducts alleged with full knowledge of all the facts and
13 circumstances, including with full knowledge of each and every wrongful
14 act and conduct and Plaintiffs' damages caused therefrom.

15 16 **JURISDICTION AND VENUE**

17 14. This is an action for patent infringement arising under the
18 Patent Laws of the United States, Title 35 of the United States Code.

19 15. This Court has subject matter jurisdiction under 28 U.S.C. §§
20 1331 and 1338.

21 16. Upon information and belief, Defendants regularly conduct
22 business in this judicial district and have committed acts of patent
23 infringement in this judicial district, including, *inter alia*, importing, selling
24 and/or offering to sell infringing products and services in this judicial
25 district.

26 17. Upon information and belief, Defendants have ongoing and
27 systematic contacts with this judicial district and the United States. In
28 particular, Defendants' principal places of business are located in this

1 judicial district, and Defendants have regular and established places of
2 business in this judicial district.

3 18. Venue is proper in this judicial district under 28 U.S.C. §§
4 1391(c) and 1400(b).

5
6 **JOINDER**

7 19. Defendants are properly joined under 35 U.S.C. § 299(a)(1)
8 because a right to relief is asserted against the parties jointly, severally and
9 in the alternative with respect to the same transactions, occurrences, or series
10 of transactions or occurrences relating to the using, importing into the
11 United States, offering for sale, and/or selling of the same accused products.
12 Specifically, as alleged in detail below, Defendants are alleged to infringe
13 Unilin's patents with respect to the same connectable laminate flooring
14 system.

15 20. Defendants are properly joined under 35 U.S.C. § 299(a)(2).
16 Questions of fact will arise that are common to all defendants, including, for
17 example, whether Defendants' products have features that meet the
18 limitations of one or more claims of Unilin's patents, and what reasonable
19 royalty will be adequate to compensate Plaintiffs for their infringement.

20 21. Defendants use, sell, offer for sale and/or import products that
21 infringe Unilin's patents.

22 22. At least one right to relief is asserted against these parties
23 jointly, severally, or in the alternative with respect to or arising out of the
24 same transaction, occurrence, or series of transactions or occurrences
25 relating to the using, importing into the United States, offering for sale,
26 and/or selling of the same accused product and/or process.
27
28

FIRST CLAIM FOR RELIEF

INFRINGEMENT OF U.S. PATENT NO. 6,874,292

23. The allegations set forth in Paragraphs 1-22 above are incorporated into this First Claim for Relief.

24. On April 5, 2005, U.S. Patent No. 6,874,292, entitled “Floor Panel With Edge Connectors,” was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the ’292 Patent is attached as **Exhibit A** to this Complaint.

25. Plaintiffs are the assignee and owner of the right, title, and interest in and to the ’292 Patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

26. In violation of 35 U.S.C. § 271, Defendants have directly infringed and continue to directly infringe, literally and/or under the doctrine of equivalents, the ’292 Patent by importing, using, selling and/or offering for sale in the United States, including in this Judicial District, connectable laminate flooring products capable of providing features claimed in the ’292 Patent (“the ’292 Accused Products and Services”), without the authority of Plaintiffs.

27. These products include, by way of example only, at least Defendants’ laminate flooring products branded “Laminate Flooring,” “Laminate Flooring Handscraped,” and/or US Wood Flooring,” and infringe at least Claims 1-4 of the ’292 Patent.

28. Plaintiffs provided actual notice to Defendants US Wood Flooring, Inc. and Flooring Trading Company LLC of their infringement of the ’292 Patent in multiple letters, the earliest dated November 2015.

1 29. Defendants have had actual knowledge of the '292 Patent and
2 their infringement of that patent since at least the date that the letters were
3 received by Defendants and/or their related entities.

4 30. Upon information and belief, Defendants have committed and
5 continue to commit acts of contributory infringement of the '292 patent
6 under 35 U.S.C. § 271(c) by selling, offering to sell, and/or importing
7 products including the '292 Accused Products and Services for the '292
8 Patent, knowing or willfully blind to the fact that these products and services
9 constitute a material part of the invention, were especially made or
10 especially adapted for use in an infringement of the '292 Patent, and have no
11 substantial non-infringing uses.

12 31. Upon information and belief, since at least the date they
13 received the notice letter from Plaintiffs notifying Defendants that their
14 products infringed the '292 Patent, Defendants have induced and continue to
15 induce others to infringe the '292 Patent under 35 U.S.C. § 271(b) by,
16 among other things, and with specific intent, actively and knowingly aiding
17 and abetting others to infringe, including, but not limited to, Defendants'
18 customers whose use of the '292 Accused Products and Services constitutes
19 direct infringement of the '292 Patent. In particular, Defendants acted with
20 specific intent to make others, such as its customers, infringe by advertising
21 and selling the products and by providing written instructions instructing
22 customers how to assemble and use the products. On information and belief,
23 Defendants engaged in such actions with specific intent to cause
24 infringement or with willful blindness to the resulting infringement because
25 Defendants have had actual knowledge of the '292 Patent and that its acts
26 were inducing its customers to infringe the '292 Patent.

27 32. Plaintiffs have been harmed by Defendants' infringing
28 activities.

1 33. Plaintiffs provided notice of infringement of the '292 Patent to
2 Defendants, but Defendants thereafter continued to infringe the patent. On
3 information and belief, Defendants' infringement has been and continues to
4 be willful.

5
6 **SECOND CLAIM FOR RELIEF**
7 **INFRINGEMENT OF U.S. PATENT NO. 6,928,779**

8 34. The allegations set forth in Paragraphs 1-22 above are
9 incorporated into this Second Claim for Relief.

10 35. On August 16, 2005, U.S. Patent No. 6,928,779, entitled "Floor
11 Panel With Edge Connectors," was duly and legally issued by the United
12 States Patent and Trademark Office. A true and correct copy of the '779
13 Patent is attached as **Exhibit B** to this Complaint.

14 36. Plaintiffs are the assignee and owner of the right, title, and
15 interest in and to the '779 Patent, including the right to assert all causes of
16 action arising under said patent and the right to any remedies for
17 infringement of it.

18 37. In violation of 35 U.S.C. § 271, Defendants have directly
19 infringed and continue to directly infringe, literally and/or under the doctrine
20 of equivalents, the '779 Patent by importing, using, selling and/or offering
21 for sale in the United States, including in this Judicial District, products
22 capable of providing features claimed in the '779 Patent ("the '779 Accused
23 Products and Services"), without the authority of Plaintiffs.

24 38. These products include, by way of example only, at least
25 Defendants' laminate flooring products branded "Laminate Flooring,"
26 "Laminate Flooring Handscraped," and/or US Wood Flooring," and infringe
27 at least Claims 1, 5, 13, and 17 of the '779 Patent.
28

1 39. Plaintiffs provided actual notice to Defendants US Wood
2 Flooring, Inc. and Flooring Trading Company LLC of their infringement of
3 the '779 Patent in multiple letters, the earliest dated November 2015.

4 40. Defendants have had actual knowledge of the '779 Patent and
5 their infringement of that patent since at least the date that the letters were
6 received by Defendants and/or their related entities.

7 41. Upon information and belief, Defendants have committed and
8 continue to commit acts of contributory infringement of the '779 patent
9 under 35 U.S.C. § 271(c) by selling, offering to sell, and/or importing
10 products including the '779 Accused Products and Services for the '779
11 Patent, knowing or willfully blind to the fact that these products and services
12 constitute a material part of the invention, were especially made or
13 especially adapted for use in an infringement of the '779 Patent, and have no
14 substantial non-infringing uses.

15 42. Upon information and belief, since at least the date they
16 received the notice letter from Plaintiffs notifying Defendants that their
17 products infringed the '779 Patent, Defendants have induced and continue to
18 induce others to infringe the '779 Patent under 35 U.S.C. § 271(b) by,
19 among other things, and with specific intent, actively and knowingly aiding
20 and abetting others to infringe, including, but not limited to, Defendants'
21 customers whose use of the '779 Accused Products and Services constitutes
22 direct infringement of the '779 Patent. In particular, Defendants acted with
23 specific intent to make others, such as its customers, infringe by advertising
24 and selling the products and by providing written instructions instructing
25 customers how to assemble and use the products. On information and belief,
26 Defendants engaged in such actions with specific intent to cause
27 infringement or with willful blindness to the resulting infringement because
28

1 Defendants have had actual knowledge of the '779 Patent and that its acts
2 were inducing its customers to infringe the '779 Patent.

3 43. Plaintiffs have been harmed by Defendants' infringing
4 activities.

5 44. Plaintiffs provided notice of infringement of the '779 Patent to
6 Defendants, but Defendants thereafter continued to infringe the patent. On
7 information and belief, Defendants' infringement has been and continues to
8 be willful.

9 **THIRD CLAIM FOR RELIEF**

10 **INFRINGEMENT OF U.S. PATENT NO. 6,490,836**

11 45. The allegations set forth in Paragraphs 1-22 above are
12 incorporated into this Third Claim for Relief.

13 46. On December 10, 2002, U.S. Patent No. 6,490,836, entitled
14 "Floor Panel With Edge Connectors," was duly and legally issued by the
15 United States Patent and Trademark Office. A true and correct copy of the
16 '836 Patent is attached as **Exhibit C** to this Complaint.

17 47. Plaintiffs are the assignee and owner of the right, title, and
18 interest in and to the '836 Patent, including the right to assert all causes of
19 action arising under said patent and the right to any remedies for
20 infringement of it.

21 48. In violation of 35 U.S.C. § 271, Defendants have directly
22 infringed and continue to directly infringe, literally and/or under the doctrine
23 of equivalents, the '836 Patent by importing, making, using, selling and/or
24 offering for sale in the United States, including in this Judicial District,
25 products capable of providing features claimed in the '836 Patent ("the '836
26 Accused Products and Services"), without the authority of Plaintiff.

27 49. These products include, by way of example only, at least
28 Defendants' laminate flooring products branded "Laminate Flooring,"

1 “Laminate Flooring Handscraped,” and/or US Wood Flooring,” and infringe
2 at least Claims 1, 2, 10, 18, 23, and 24 of the ’836 Patent.

3 50. Plaintiffs provided actual notice to Defendants US Wood
4 Flooring, Inc. and Flooring Trading Company LLC of their infringement of
5 the ’836 Patent in multiple letters, the earliest dated November 2015.

6 51. Defendants have had actual knowledge of the ’836 Patent and
7 their infringement of that patent since at least the date that the letters were
8 received by Defendants and/or their related entities.

9 52. Upon information and belief, Defendants have committed and
10 continue to commit acts of contributory infringement of the ’836 patent
11 under 35 U.S.C. § 271(c) by selling, offering to sell, and/or importing
12 products including the ’836 Accused Products and Services for the ’836
13 Patent, knowing or willfully blind to the fact that these products and services
14 constitute a material part of the invention, were especially made or
15 especially adapted for use in an infringement of the ’836 Patent, and have no
16 substantial non-infringing uses.

17 53. Upon information and belief, since at least the date they
18 received the notice letter from Plaintiffs notifying Defendants that their
19 products infringed the ’836 Patent, Defendants have induced and continue to
20 induce others to infringe the ’836 Patent under 35 U.S.C. § 271(b) by,
21 among other things, and with specific intent, actively and knowingly aiding
22 and abetting others to infringe, including, but not limited to, Defendants’
23 customers whose use of the ’836 Accused Products and Services constitutes
24 direct infringement of the ’836 Patent. In particular, Defendants acted with
25 specific intent to make others, such as its customers, infringe by advertising
26 and selling the products and by providing written instructions instructing
27 customers how to assemble and use the products. On information and belief,
28 Defendants engaged in such actions with specific intent to cause

1 infringement or with willful blindness to the resulting infringement because
 2 Defendants have had actual knowledge of the '836 Patent and that its acts
 3 were inducing its customers to infringe the '836 Patent.

4 54. Plaintiffs have been harmed by Defendants' infringing
 5 activities.

6 55. Plaintiffs provided notice of infringement of the '836 Patent to
 7 Defendants, but Defendants thereafter continued to infringe the patent. On
 8 information and belief, Defendants' infringement has been and continues to
 9 be willful.

10
 11 **FOURTH CLAIM FOR RELIEF**
 12 **INFRINGEMENT OF U.S. PATENT NO. 6,786,019**

13 56. The allegations set forth in Paragraphs 1-22 above are
 14 incorporated into this Fourth Claim for Relief.

15 57. On September 7, 2004, U.S. Patent No. 6,786,019, entitled
 16 "Floor Covering," was duly and legally issued by the United States Patent
 17 and Trademark Office. A true and correct copy of the '019 Patent is
 18 attached as **Exhibit D** to this Complaint.

19 58. Plaintiff Flooring Industries, Ltd. Sarl is the owner of the right,
 20 title, and interest in and to the '019 Patent, including the right to assert all
 21 causes of action arising under said patent and the right to any remedies for
 22 infringement of it.

23 59. In violation of 35 U.S.C. § 271, Defendants have directly
 24 infringed and continue to directly infringe, literally and/or under the doctrine
 25 of equivalents, the '019 Patent by importing, making, using, selling and/or
 26 offering for sale in the United States, including in this Judicial District,
 27 products capable of providing features claimed in the '019 Patent ("the '019
 28 Accused Products and Services"), without the authority of Plaintiff Flooring
 Industries, Ltd. Sarl.

1 60. These products include, by way of example only, at least
2 Defendants' laminate flooring products branded "Laminate Flooring,"
3 "Laminate Flooring Handscraped," and/or US Wood Flooring," and infringe
4 at least Claims 1, 5, 6, 8-13, and 16 of the '019 Patent.

5 61. Defendants have had constructive knowledge of the '019 Patent
6 and their infringement of that patent.

7 62. Upon information and belief, Defendants have committed and
8 continue to commit acts of contributory infringement of the '019 patent
9 under 35 U.S.C. § 271(c) by selling, offering to sell, and/or importing
10 products including the '019 Accused Products and Services for the '019
11 Patent, knowing or willfully blind to the fact that these products and services
12 constitute a material part of the invention, were especially made or
13 especially adapted for use in an infringement of the '019 Patent, and have no
14 substantial non-infringing uses.

15 63. Upon information and belief, since at least the date they
16 received letters from Plaintiffs notifying Defendants that their products
17 infringed various of Plaintiffs' patents, Defendants have induced and
18 continue to induce others to infringe the '019 Patent under 35 U.S.C. §
19 271(b) by, among other things, and with specific intent, actively and
20 knowingly aiding and abetting others to infringe, including, but not limited
21 to, Defendants' customers whose use of the '019 Accused Products and
22 Services constitutes direct infringement of the '019 Patent. In particular,
23 Defendants acted with specific intent to make others, such as its customers,
24 infringe by advertising and selling the products and by providing written
25 instructions instructing customers how to assemble and use the products. On
26 information and belief, Defendants engaged in such actions with specific
27 intent to cause infringement or with willful blindness to the resulting
28 infringement because Defendants have had actual and/or constructive

1 knowledge of the '019 Patent and that its acts were inducing its customers to
2 infringe the '019 Patent.

3 64. Plaintiff Flooring Industries, Ltd. Sarl has been harmed by
4 Defendants' infringing activities.

5 65. On information and belief, Defendants' infringement has been
6 and continues to be willful.

7
8 **FIFTH CLAIM FOR RELIEF**

9 **INFRINGEMENT OF U.S. PATENT NO. 7,249,445**

10 66. The allegations set forth in Paragraphs 1-22 above are
11 incorporated into this Fifth Claim for Relief.

12 67. On July 31, 2007, U.S. Patent No. 7,249,445, entitled "Floor
13 Covering, Floor Panels for Forming Such Floor Covering, and Method of
14 Realizing Such Floor Panels," was duly and legally issued by the United
15 States Patent and Trademark Office. A true and correct copy of the '445
16 Patent is attached as **Exhibit E** to this Complaint.

17 68. Plaintiff Flooring Industries, Ltd. Sarl is the owner of the right,
18 title, and interest in and to the '445 Patent, including the right to assert all
19 causes of action arising under said patent and the right to any remedies for
20 infringement of it.

21 69. In violation of 35 U.S.C. § 271, Defendants have directly
22 infringed and continue to directly infringe, literally and/or under the doctrine
23 of equivalents, the '445 Patent by importing, making, using, selling and/or
24 offering for sale in the United States, including in this Judicial District,
25 products capable of providing features claimed in the '445 Patent ("the '445
26 Accused Products and Services"), without the authority of Plaintiff Flooring
27 Industries, Ltd. Sarl.

1 70. These products include, by way of example only, at least
2 Defendants' laminate flooring product branded "Laminate Flooring
3 Handscraped," and infringe at least Claims 1, 3, 4, 6, 8, and 9 of the '445
4 Patent.

5 71. Defendants have had constructive knowledge of the '445 Patent
6 and their infringement of that patent.

7 72. Upon information and belief, Defendants have committed and
8 continue to commit acts of contributory infringement of the '445 patent
9 under 35 U.S.C. § 271(c) by selling, offering to sell, and/or importing
10 products including the '445 Accused Products and Services for the '445
11 Patent, knowing or willfully blind to the fact that these products and services
12 constitute a material part of the invention, were especially made or
13 especially adapted for use in an infringement of the '445 Patent, and have no
14 substantial non-infringing uses.

15 73. Upon information and belief, since at least the date they
16 received letters from Plaintiffs notifying Defendants that their products
17 infringed various of Plaintiffs' patents, Defendants have induced and
18 continue to induce others to infringe the '445 Patent under 35 U.S.C. §
19 271(b) by, among other things, and with specific intent, actively and
20 knowingly aiding and abetting others to infringe, including, but not limited
21 to, Defendants' customers whose use of the '445 Accused Products and
22 Services constitutes direct infringement of the '445 Patent. In particular,
23 Defendants acted with specific intent to make others, such as its customers,
24 infringe by advertising and selling the products and by providing written
25 instructions instructing customers how to assemble and use the products. On
26 information and belief, Defendants engaged in such actions with specific
27 intent to cause infringement or with willful blindness to the resulting
28 infringement because Defendants have had actual and/or constructive

1 knowledge of the '445 Patent and that its acts were inducing its customers to
2 infringe the '445 Patent.

3 74. Plaintiff Flooring Industries, Ltd. Sarl has been harmed by
4 Defendants' infringing activities.

5 75. On information and belief, Defendants' infringement has been
6 and continues to be willful.

7 **JURY DEMAND**

8 76. Pursuant to Rule 38 of the Federal Rules of Civil Procedure,
9 Plaintiffs demand a trial by jury on all issues triable as such.

10 **PRAYER FOR RELIEF**

11
12 77. WHEREFORE, Plaintiffs respectfully request that this Court
13 enter judgment in their favor and against Defendants as follows:

- 14 a. An adjudication that Defendants have infringed the '292,
15 '779, '836, '019, and '445 Patents;
- 16 b. A permanent injunction against continued patent
17 infringement by Defendants pursuant to 35 U.S.C. § 283 or,
18 failing that, an ongoing royalty to compensate Plaintiffs for
19 any sales made post-judgment;
- 20 c. An award of damages adequate to compensate Plaintiffs for
21 Defendants' past infringement and any continuing or future
22 infringement of the '292, '779, '836, '019, and '445 Patents
23 through the date such judgment is entered, including
24 interest, costs, expenses, and an accounting of all infringing
25 acts including, but not limited to, those acts not presented at
26 trial;
- 27 d. A declaration that this case is exceptional under 35 U.S.C. §
28 285, and an award of Plaintiffs' reasonable attorneys' fees;
and

e. An award of treble damages under 35 U.S.C. § 284.

Dated: January 17, 2017

/s/ John C. Matthews

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