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*Attorneys for Plaintiff Tyger
Manufacturing, LLC, a California
Limited Liability Company*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Tyger Manufacturing LLC, a California
limited liability company,

Plaintiff,

vs.

Chongson, Inc. dba Chong's Choice, a
Nevada domestic corporation

Defendants.

Case No:

**COMPLAINT FOR PATENT
INFRINGEMENT**

Plaintiff Tyger Manufacturing LLC, a California limited liability company ("Plaintiff" or "Tyger") brings this Complaint for Patent Infringement against Defendant Chongson, Inc. dba Chong's Choice, a Nevada domestic corporation, ("Defendant"). Plaintiff alleges as follows:

JURISDICTION AND VENUE

1. This is a civil action for patent infringement arising under the patent laws of the United States of America, 35 U.S.C. § 1, et seq.

1 12. Defendant has used, manufactured, offered for sale, sold and/or caused to be
2 imported into the United States products that infringe the claims of the '487 patent in violation of
3 35 U.S.C. §271.

4 13. Plaintiff has been damaged and has suffered irreparable injury due to acts of
5 infringement by Defendant and will continue to suffer irreparable injury unless Defendant's
6 activities are enjoined.

7 14. Plaintiff has suffered and will continue to suffer substantial damages by reason of
8 Defendant's act of patent infringement alleged above, and Plaintiff is entitled to recover from
9 Defendant the damages sustained as a result of Defendant's acts.

10 15. On information and belief, Defendant has willfully and deliberately infringed the
11 '487 patent in disregard of Plaintiff's rights.

12
13 **PRAYER FOR RELIEF**

14 WHEREFORE, Plaintiff prays that judgment be entered by this Court in its favor and
15 against Defendant as follows:

16 A. That Defendant has infringed the '487 patent;

17 B. Permanently enjoining and restraining Defendant, its agents, affiliates, subsidiaries,
18 servants, employees, officers, directors, attorneys and those persons in active concert with or
19 controlled by Defendant from further infringing the '487 patent;

20 C. That Defendant's acts of infringement are willful;

21 D. That Plaintiff be awarded damages covered by the acts of patent infringement of
22 Defendant in an amount not less than a reasonable royalty pursuant to 25 U.S.C. § 284 or in an
23 amount equal to Defendant's profits pursuant to 35 U.S.C. § 289, whichever is greater, and that
24 such damages be trebled in accordance with the provisions of 35 U.S.C. § 284;

25 E. That Defendant be directed to withdraw from distribution all infringing products,
26 whether in the possession of Defendant or its distributors or retailers, and that all infringing products
27 or materials be impounded or destroyed;

28 F. For monetary damages in an amount according to proof;

1 G. For interest on said damages at the legal rate from and after the date such damages
2 were incurred;

3 H. That this is an exceptional case and for an award of Plaintiff's attorney fees and
4 costs; and

5 I. For such other relief as the Court may deem just and proper.

6
7 **DEMAND FOR JURY TRIAL**

8 Plaintiff Tyger demands a jury trial as to all issues that are so triable.

9 DATED: February 9, 2017

10 WOLF, RIFKIN, SHAPIRO,
11 SCHULMAN & RABKIN, LLP

12 By: /s/Jordan Butler

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