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11		
12	UNITED STATES DISTRICT COURT	
13	DISTRICT OF NEVADA	
14	Tyger Manufacturing LLC, a California	
15	limited liability company,	Case No:
16	Plaintiff,	COMPLAINT FOR PATENT
17	vs.	INFRINGEMENT
18	Shenzhen Airis Electron Co., Ltd. dba	
19	Airistech	
20	Defendant.	
21		·
22	Plaintiff Tyger Manufacturing LLC, a California limited liability company ("Plaintiff" or	
23	"Tyger") brings this Complaint for Patent Infringement against Defendant Shenzhen Airis Electron	
24	Co., Ltd. dba Airistech ("Defendant"). Plaintiff alleges as follows:	
25	JURISDICTION AND VENUE	
26	1. This is a civil action for patent infringement arising under the patent laws of the	
27	United States of America, 35 U.S.C. § 1, et seq.	
28		

COMPLAINT

Office. A copy of the '487 patent is attached hereto as Exhibit A.

28

- 14. The '487 patent has been in force and effect since its issuance. Plaintiff Tyger has been at all times, and still is, the owner of the entire right, title and interest in and to the '487 patent.
- 15. Defendant is marketing and offering to sell throughout the United States a line of smoking pipes that infringes the '487 patent (the "Infringing Products").
- 16. On information and belief, Defendant derived the designs for its Infringing Products with knowledge of Plaintiff's rights in the '487 patent.

## PRAYER FOR RELIEF

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

- A. That Defendant has infringed the '487 patent;
- B. Permanently enjoining and restraining Defendant, its agents, affiliates, subsidiaries, servants, employees, officers, directors, attorneys and those persons in active concert with or controlled by Defendant from further infringing the '487 patent;
  - C. That Defendant's acts of infringement are willful;
- D. That Plaintiff be awarded damages covered by the acts of patent infringement of Defendant in an amount not less than a reasonable royalty pursuant to 25 U.S.C. § 284 or in an amount equal to Defendant's profits pursuant to 35 U.S.C. § 289, whichever is greater, and that such damages be trebled in accordance with the provisions of 35 U.S.C. § 284;
- E. That Defendant be directed to withdraw from distribution all infringing products, whether in the possession of Defendant or its distributors or retailers, and that all infringing products or materials be impounded or destroyed;
  - F. For monetary damages in an amount according to proof;
- G. For interest on said damages at the legal rate from and after the date such damages were incurred;
- H. That this is an exceptional case and for an award of Plaintiff's attorney fees and costs; and

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1 I. For such other relief as the Court may deem just and proper. 2 **DEMAND FOR JURY TRIAL** 3 Plaintiff Tyger demands a jury trial as to all issues that are so triable. 4 DATED: February 9, 2017 WOLF, RIFKIN, SHAPIRO, 5 SCHULMAN & RABKIN, LLP 6 7 By: /s/Jordan Butler Don Springmeyer, Esq. (SBN 1021) 8 Jordan Butler, Esq. (SBN 10531) WOLF, RIFKIN, SHAPIRO, SCHULMAN & 9 RABKIN, LLP 3556 E. Russell Road, 2nd Floor 10 Las Vegas, Nevada 89120 Telephone: (702) 341-5200 / FAX: (702) 341-5300 11 Email: dspringmeyer@wrslawyers.com Email: jbutler@wrslawyers.com 12 Attorneys for Tyger 13 Manufacturing, LLC, a California Limited Liability Company 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

> -4-COMPLAINT