

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

TANGELO IP, LLC)
)
 Plaintiff,)
) Civil Action No. 2:17-cv-576
 v.)
) **JURY TRIAL DEMANDED**
 HARBOR FREIGHT TOOLS USA, INC.)
)
 Defendant.)
 _____)

COMPLAINT

For its Complaint, Plaintiff Tangelo IP, LLC ("Tangelo"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Tangelo is a Texas limited liability company with a place of business located at 555 Republic Drive, 2nd Floor #42, Plano, Texas 75074.

2. Defendant Harbor Freight Tools USA, Inc. is a Delaware company with, upon information and belief, a place of business located at 1704 E. Belt Line Road, Richardson, Texas 75081.

3. Upon information and belief, Defendant registered with the Texas Secretary of State to conduct business in Texas.

JURISDICTION AND VENUE

4. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

5. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

6. Upon information and belief, Defendant conducts substantial business in this

forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in this district.

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

BACKGROUND

8. Tangelo's closely related operating entity is Tangelo, LLC (formerly known as Active8media, LLC), a developer of advanced interactive and shoppable image products. Tangelo's technology already is used by many major publishers to drive sales and connect readers and customers. Tangelo, LLC was awarded a MAX Marketing Award for its interactive image technology. It was also showcased on CNBC's Power Lunch for the implementation of Vogue Magazine's interactive ad images and the resulting highest revenue issue in Vogue's 110-year history.

9. Among other things, Tangelo, LLC operates Tangelo Images, a user interface application for creating interactive brand and user-generated photos. In addition, Tangelo, LLC launched Tangelo Tags within the Facebook app center to allow brand and individual users to create interactive and shoppable photos within Facebook's timeline. Tangelo, LLC has been recognized as a TAG Top 40 - Georgia's Most Innovative Companies.

10. Todd Mannik is a co-founder of Tangelo, LLC. Since at least 1999, Mr. Mannik has dedicated his career to focusing on the interactivity of photo images and the discovery of what's "inside" a photo. Mr. Mannik is the co-inventor of several patents, including the patent-in-suit, which represent pioneering advances in the transformation of images into interactive and shoppable images online.

THE PATENT-IN-SUIT

11. On April 23, 2013, U.S. Patent No. 8,429,005 (the "'005 patent"), entitled "Method for Determining Effectiveness of Display of Objects in Advertising Images," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '090 patent is attached hereto as Exhibit A.

12. Mr. Mannik is the first listed co-inventor on the patent-in-suit, which is U.S. Patent No. 8,429,005 (the "'005 patent"). The '005 patent is a continuation-in-part of U.S. Patent No. 6,535,889, which is a continuation-in-part of U.S. Patent No. 6,557,006. The earliest filing in the priority chain leading up to the '005 patent is U.S. Patent Application No. 09/406,171, filed on Sep. 23, 1999.

13. The technology recited in the claims of the '005 patent provides an inventive concept and does not claim an abstract idea. The inventive concept greatly enhances and facilitates technological methods and apparatuses which comprise providing of electronic and interactive catalogs comprising replications of product images appearing in a corresponding physical catalogs, wherein the electronic and interactive replications include selectable portions corresponding with the image replications, and wherein selection of the selectable portions provides additional product information and enables a user to initiate an online purchase of the product.

14. One inventive component of the '005 patent is improving electronic catalogs in ways that are necessarily rooted in computer technology to overcome problems specifically arising in the realm of computer networks, including the Internet. The claims recite an invention that was not merely a routine or conventional use of the Internet.

15. The technology claimed in the '005 patent does not preempt all types of electronic

catalogs or anything else. For example, the prior art cited on the face of the '005 patent remains available for practice by the Defendant, and the '005 patent claims do not preempt practice of those prior art methods.

16. The '005 patent claims cannot be practiced by a human alone and there exists no human analogue to the methods claimed in the '005 patent. The claims are specifically directed to, *inter alia*, the electronic and interactive replication of product images appearing in a corresponding physical publication page, wherein the electronic and interactive replications include selectable portions corresponding with duplications of the appearance of the product, and wherein selection of the selectable portions provides additional product information and enables a user to initiate an online purchase of the product. These things exist only in the context of computers.

17. Tangelo is the assignee and owner of the right, title and interest in and to the '005 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 8,429,005

18. Tangelo repeats and realleges the allegations of paragraphs 1 through 17 as if fully set forth herein.

19. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of the '005 patent by practicing, making, using, importing, offering for sale, selling and/or hosting methods and computer readable media for methods, apparatuses, and computer readable media, including associated with websites and/or apps, for providing an electronic and interactive replication of product images appearing in a corresponding physical publication page.

20. More specifically and upon information and belief, Defendant's online catalog system for providing interactive replications of product images appears in a corresponding physical publication page.

PITTSBURGH AUTOMOTIVE
#1 SELLING JACKS IN AMERICA

#1 HEAVY DUTY STEEL
Precision welded construction. Industrial quality for professional mechanics.
3 TON CAPACITY. LIFTS FROM 5" TO 48-1/4".
ITEM #0011 \$84.99 Compare \$141.88

#1 LIGHTWEIGHT ALUMINUM
Dead parallel pump cyclones. PE onw quality design.
1.5 TON CAPACITY. LIFTS FROM 3-1/2" TO 14-1/2".
ITEM #0012 \$79.99 Compare \$109.99

PROFESSIONAL 3 TON SUPER DUTY STEEL JACK
ITEM #0014 \$199.99 Compare \$400.00

FOLDABLE SHOP CRANES
ITEM #0015 \$169.99 Compare \$269.00

ENGINE STANDS
ITEM #0016 \$59.99 Compare \$89.99

TRANSMISSION JACKS
ITEM #0017 \$29.99 Compare \$55.77

HEAVY DUTY STEEL JACK STAMPS
ITEM #0018 \$44.99 Compare \$62.59

HYDRAULIC BOTTLE JACKS
ITEM #0019 \$119.99 Compare \$149.99

SHOP PRESSES
ITEM #0020 \$179.99 Compare \$174.00

MADDOX HEAVY DUTY CASE INCLUDED TOOLS
ITEM #0021 \$89.99 Compare \$154.99

HYDRAULIC BOTTLE JACKS
ITEM #0022 \$169.99 Compare \$219.99

HYDRAULIC TABLE CARTS
ITEM #0023 \$169.99 Compare \$219.99

TELESCOPING GANTRY CRANE
ITEM #0024 \$729.99 Compare \$828.00

AC R134A MANIFOLD GAUGE SET
ITEM #0025 \$59.99 Compare \$73.99

VACUUM PUMPS
ITEM #0026 \$89.99 Compare \$155.00

2.5 CFM TWO STAGE 3 CFM
ITEM #0027 \$159.00

<http://flyer.harborfreight.com/4914/316878/pdfs/8c72b4ee0b42a8c33a7bdee23c3275e26e437675.pdf> ("Print Ad") at p. 4.



M 4 / 16 M

<http://flyer.harborfreight.com/july-2017-ad/page/4> ("Online Ad"). Defendant uses a computer system that associates a page number of a physical publication page with an electronic and interactive replication of at least a portion of the physical publication page, and the electronic catalog comprises exact duplications of the at least two different products from the physical publication.

PITTSBURGH
3 TON HEAVY DUTY
STEEL JACK STANDS
• 2 piece set
Customer Rating:

ITEM #2027
42274/2026A
Compare \$49.99

\$21.99 **SAVE 56%**

PITTSBURGH
OVERSIZED
LOW-PROFILE CREEPER
• 320 lb. capacity
Customer Rating:

ITEM #2027
42274/2026A
Compare \$79.99

\$27.99 **SAVE 65%**

2 PIECE PITTSBURGH
VEHICLE WHEEL DOLLIES
1600 LB. CAPACITY
Customer Rating:

ITEM #1812
42121
Compare \$79.99

\$49.99 **SAVE 37%**

1500 LB. CAPACITY
Customer Rating:

ITEM #2024
42124
Compare \$84.99

\$54.99

PITTSBURGH
VEHICLE POSITIONING
WHEEL DOLLY
• Fits up to 32" tires
• 1200 lb. capacity
Customer Rating:

ITEM #2024
42124
Compare \$279.99

\$89.99 **SAVE 190%**

PITTSBURGH
800 LB. CAPACITY
TRANSMISSION JACK
• Min. height: 8-1/2"
• Max. height: 24-1/2"
Customer Rating:

ITEM #2024
42124
Compare \$235.97

\$159.99 **SAVE 75%**

PITTSBURGH
2 TON TROLLEY JACK

PITTSBURGH AUTOMOTIVE

#1 SELLING JACKS IN AMERICA

#1 HEAVY DUTY STEEL **SAVE 110%**

Precision welded construction
Industrial quality for
professional mechanics

3 TON CAPACITY
• Weights 74 lbs.
Customer Rating:

LIFTS FROM
9" TO 18-1/4"

ITEM #2027
42274/2026A
Compare \$141.88

\$84.99

ITEM #2027
42274/2026A
Compare \$149.98

\$94.99

ITEM #2027
42274/2026A
Compare \$199.99

\$129.99

ITEM #2027
42274/2026A
Compare \$249.99

\$139.99

#1 LIGHTWEIGHT ALUMINUM **SAVE 90%**

Dual parallel pump system
Fit crew quality design

1.5 TON CAPACITY
• Weights 54 lbs.
Customer Rating:

LIFTS FROM
8-1/2" TO 14-1/8"

ITEM #2027
42124/2024A
Compare \$109.99

\$79.99

ITEM #2027
42124/2024A
Compare \$149.99

\$139.99

ITEM #2027
42124/2024A
Compare \$199.99

\$149.99

ITEM #2027
42124/2024A
Compare \$259.99

\$169.99

DAYTONA BEATS Snap-on

**PROFESSIONAL 3 TON
SUPER DUTY
STEEL JACK**

ITEM #2193
42193/2194
Compare \$169.99

\$129.99 **PRICE \$169.99**

FOLDABLE SHOP CRANES **SAVE 90%**

• Includes ram, hook and chain
• Boom extends from
30-1/4" to 55-1/4"
• Crane height adjustable
from 27" to 64"
Customer Rating:

ITEM #2193
42193/2194
Compare \$269

\$169.99

ENGINE STANDS

• Heavy duty all-steel construction
• Fully adjustable support rotates
360° and locks in place
Customer Rating:

ITEM #2193
42193/2194
Compare \$89.99

\$59.99

**1000 LB. CAPACITY
FOLDABLE**

ITEM #2193
42193/2194
Compare \$189.99

\$134.99

2 TON CAPACITY

• Boom extends from 41" to 61-1/4"
• Crane height adjustable
from 13-3/8" to 60"
Customer Rating:

ITEM #2193
42193/2194
Compare \$229.99

\$229.99

**1500 LB. STEEL ATV/
MOTORCYCLE LIFT**

• Lift range: 8-1/2" to 17"
• Weights 71 lbs.
Customer Rating:

ITEM #2193
42193/2194
Compare \$99.99

\$89.99

300 LB. ATV/LAWN MOWER LIFT

• Lift range: 0" to 24"
• Dual lock pedals for
hands free operation
• Five position saddle
adjustments
Customer Rating:

ITEM #2193
42193/2194
Compare \$99.99

\$99.99

**1500 LB. ALUMINUM
ATV/MOTORCYCLE LIFT**

• Lift range: 4-1/2" to 16"
• Weight 41 lbs.
• Light weight
• Removable steel ramp
• Weights 280 lbs.
Customer Rating:

ITEM #2193
42193/2194
Compare \$248

\$159.97

1000 LB. STEEL MOTORCYCLE LIFT

• Lift range: 7" to 12-1/2"
• Premium diamond plated steel platform
• Three position tire view for stability
• Removable steel ramp
• Weights 280 lbs.
Customer Rating:

ITEM #2193
42193/2194
Compare \$249.99

\$179.99

Print Ad.

PITTSBURGH
3 TON HEAVY DUTY
STEEL JACK STANDS
• 2 piece set
Customer Rating:

ITEM #2027
42274/2026A
Compare \$49.99

\$21.99 **SAVE 56%**

PITTSBURGH
OVERSIZED
LOW-PROFILE CREEPER
• 320 lb. capacity
Customer Rating:

ITEM #2027
42274/2026A
Compare \$79.99

\$27.99 **SAVE 65%**

2 PIECE PITTSBURGH
VEHICLE WHEEL DOLLIES
1600 LB. CAPACITY
Customer Rating:

ITEM #1812
42121
Compare \$79.99

\$49.99 **SAVE 37%**

1500 LB. CAPACITY
Customer Rating:

ITEM #2024
42124
Compare \$84.99

\$54.99

PITTSBURGH
VEHICLE POSITIONING
WHEEL DOLLY
• Fits up to 32" tires
• 1200 lb. capacity
Customer Rating:

ITEM #2024
42124
Compare \$279.99

\$89.99 **SAVE 190%**

PITTSBURGH
800 LB. CAPACITY
TRANSMISSION JACK
• Min. height: 8-1/2"
• Max. height: 24-1/2"
Customer Rating:

ITEM #2024
42124
Compare \$235.97

\$159.99 **SAVE 75%**

PITTSBURGH
2 TON TROLLEY JACK

PITTSBURGH AUTOMOTIVE

#1 SELLING JACKS IN AMERICA

#1 HEAVY DUTY STEEL **SAVE 110%**

Precision welded construction
Industrial quality for
professional mechanics

3 TON CAPACITY
• Weights 74 lbs.
Customer Rating:

LIFTS FROM
9" TO 18-1/4"

ITEM #2027
42274/2026A
Compare \$141.88

\$84.99

ITEM #2027
42274/2026A
Compare \$149.98

\$94.99

ITEM #2027
42274/2026A
Compare \$199.99

\$129.99

ITEM #2027
42274/2026A
Compare \$249.99

\$139.99

#1 LIGHTWEIGHT ALUMINUM **SAVE 90%**

Dual parallel pump system
Fit crew quality design

1.5 TON CAPACITY
• Weights 54 lbs.
Customer Rating:

LIFTS FROM
8-1/2" TO 14-1/8"

ITEM #2027
42124/2024A
Compare \$109.99

\$79.99

ITEM #2027
42124/2024A
Compare \$149.99

\$139.99

ITEM #2027
42124/2024A
Compare \$199.99

\$149.99

ITEM #2027
42124/2024A
Compare \$259.99

\$169.99

DAYTONA BEATS Snap-on

**PROFESSIONAL 3 TON
SUPER DUTY
STEEL JACK**

ITEM #2193
42193/2194
Compare \$169.99

\$129.99 **PRICE \$169.99**

FOLDABLE SHOP CRANES **SAVE 90%**

• Includes ram, hook and chain
• Boom extends from
30-1/4" to 55-1/4"
• Crane height adjustable
from 27" to 64"
Customer Rating:

ITEM #2193
42193/2194
Compare \$269

\$169.99

ENGINE STANDS

• Heavy duty all-steel construction
• Fully adjustable support rotates
360° and locks in place
Customer Rating:

ITEM #2193
42193/2194
Compare \$89.99

\$59.99

**1000 LB. CAPACITY
FOLDABLE**

ITEM #2193
42193/2194
Compare \$189.99

\$134.99

2 TON CAPACITY

• Boom extends from 41" to 61-1/4"
• Crane height adjustable
from 13-3/8" to 60"
Customer Rating:

ITEM #2193
42193/2194
Compare \$229.99

\$229.99

**1500 LB. STEEL ATV/
MOTORCYCLE LIFT**

• Lift range: 8-1/2" to 17"
• Weights 71 lbs.
Customer Rating:

ITEM #2193
42193/2194
Compare \$99.99

\$89.99

300 LB. ATV/LAWN MOWER LIFT

• Lift range: 0" to 24"
• Dual lock pedals for
hands free operation
• Five position saddle
adjustments
Customer Rating:

ITEM #2193
42193/2194
Compare \$99.99

\$99.99

**1500 LB. ALUMINUM
ATV/MOTORCYCLE LIFT**

• Lift range: 4-1/2" to 16"
• Weight 41 lbs.
• Light weight
• Removable steel ramp
• Weights 280 lbs.
Customer Rating:

ITEM #2193
42193/2194
Compare \$248

\$159.97

1000 LB. STEEL MOTORCYCLE LIFT

• Lift range: 7" to 12-1/2"
• Premium diamond plated steel platform
• Three position tire view for stability
• Removable steel ramp
• Weights 280 lbs.
Customer Rating:

ITEM #2193
42193/2194
Compare \$249.99

\$179.99

Online Ad. The electronic catalog includes a first selectable portion corresponding with


duplication of the appearance of a first product of the at least two different products and selection of the first selectable portion provides additional information about the first product and enables a user to initiate an online purchase of the first product

Online Ad.

<http://flyer.harborfreight.com/july-2017-ad/product/1858650>.

POWER TOOLS | AIR TOOLS | HAND TOOLS | TOOL STORAGE | AUTOMOTIVE & MOTORCYCLE | ENGINES & GENERATORS | WELDING | LAWN & GARDEN | MATERIAL HANDLING | EVERYTHING ELSE

Home | 3 ton Steel Heavy Duty Floor Jack with Rapid Pump®



3 ton Steel Heavy Duty Floor Jack with Rapid Pump®

PITTSBURGH Automotive

Pittsburgh Automotive - Item#69227

★★★★★ [Read 190 Reviews](#) | [Write A Review](#)

Floor Jack with Rapid Pump® lifts your vehicle with just 3-1/2 pumps

Compare \$141.99

Only: \$84.99

Qty:


ADD TO CART

[Add to My List](#) | [View Shipping Rates](#) | [Print This Page](#)

[Facebook](#) [Twitter](#) [Google+](#) [LinkedIn](#) [Pinterest](#)

Double click or slide image to view full picture

CUSTOMERS WHO VIEWED THIS OFTEN BOUGHT...




3 Ton Low Profile Steel Heavy Duty Floor Jack With Rapid Pump®

Compare \$149.99

Only: \$94.99

ADD




4 Ton Steel Heavy Duty Floor Jack With Rapid Pump®

Compare \$199.99

Only: \$129.99

ADD







1.5 Ton Aluminum Folding Floor Jack With Rapid Pump®

Compare \$109.99

Only: \$79.99

ADD

FREQUENTLY BOUGHT TOGETHER

 <p>2 Ton Steel Jack</p> <p>Item # 6271</p> <p>Compare \$49.99</p> <p>Only: \$21.99</p> <p>ADD</p> <p>Add to My List</p>	 <p>1/2 in. Drive Click Type Torque Wrench</p> <p>Item # 6</p> <p>Compare \$94.97</p> <p>Only: \$19.99</p> <p>ADD</p> <p>Add to My List</p>	 <p>Dual Drive Rotary Rock Tumbler</p> <p>Item # 4377</p> <p>Compare \$139.99</p> <p>Only: \$59.99</p> <p>ADD</p> <p>Add to My List</p>	 <p>8 in. 8 Speed Bench Drill Press</p> <p>Item # 9007</p> <p>Compare \$99.99</p> <p>Only: \$87.99</p> <p>ADD</p> <p>Add to My List</p>
---	--	--	--

Product Overview

Customer Reviews

Warranty

User Manual

Description

PITTSBURGH Automotive

This 3 ton steel auto jack features a 5 in. to 18-1/4 in. variable lifting range to elevate your car, motorcycle or supply load in only 3-1/2 pumps! A protective foam bumper on the floor jack keeps your vehicle or materials from being damaged while lifting or lowering. With a knurled aluminum handle for a steady grip and a solid, welded steel construction, this rapid pump floor jack is built for comfort and heavy use.

- Super-tough precision welded construction with an industrial grade finish
- Industrial quality for professional mechanics and hardcore automotive enthusiasts
- Rapid Pump® exclusive dual parallel pump system lifts with far fewer pumps
- Universal joint release provides precise load control in any handle position
- Meets international quality standards
- Two piece knurled steel handle for a sure grip, equipped with foam bumper to prevent damage to vehicle finish
- Extra-wide steel casters for stability

Specifications

Name	3 ton Steel Heavy Duty Floor Jack with Rapid Pump®
SKU	69227
Brand	Pittsburgh Automotive
Material	Steel
Quantity	1
Handle Length (in.)	45-114 in.
Maximum Lift Height (in.)	18-114 in.

[https://www.harborfreight.com/3-ton-steel-heavy-duty-floor-jack-with-rapid-pump-](https://www.harborfreight.com/3-ton-steel-heavy-duty-floor-jack-with-rapid-pump-69227.html?utm_source=publitas&utm_medium=monthly-ad&utm_campaign=072017)


[69227.html?utm_source=publitas&utm_medium=monthly-ad&utm_campaign=072017](https://www.harborfreight.com/3-ton-steel-heavy-duty-floor-jack-with-rapid-pump-69227.html?utm_source=publitas&utm_medium=monthly-ad&utm_campaign=072017). The electronic catalog includes a second selectable portion corresponding with duplication of the appearance of a second product of the at least two different products and selection of the second selectable portion provides additional information about the second product and enables a user to initiate an online purchase of the second product.

Online Ad.

<http://flyer.harborfreight.com/july-2017-ad/product/1858656>.

POWER TOOLS | AIR TOOLS | HAND TOOLS | TOOL STORAGE & MOTORCYCLE | AUTOMOTIVE & MOTORCYCLE | ENGINES & GENERATORS | WELDING | LAWN & GARDEN | MATERIAL HANDLING | EVERYTHING ELSE

Home | 3 Ton Daytona Professional Steel Floor Jack - Super Duty



3 Ton Daytona Professional Steel Floor Jack - Super Duty

DAYTONA

Daytona™ - Item # 63183

★★★★★ [Read 158 Reviews](#) | [Write A Review](#)

This Daytona Super Duty 3 Ton Professional Steel Jack is designed to outlast other jacks.


Compare \$666.05
Only: \$199.99

Qty: **ADD TO CART**


[Add to My List](#) | [View Shipping Rates](#) | [Print This Page](#)

[Facebook](#) [Twitter](#) [YouTube](#) [LinkedIn](#) [Google+](#)

Double click on above image to view full picture




CUSTOMERS WHO VIEWED THIS OFTEN BOUGHT...




3 Ton Low Profile Steel Heavy Duty Floor Jack With Rapid Pump

Compare \$149.99
Only: \$84.99 **ADD**



3 Ton Steel Heavy Duty Floor Jack With Static Pump


Compare \$149.99
Only: \$84.99 **ADD**



3 Ton Aluminum Racing Floor Jack With Rapid Pump


Compare \$299.99
Only: \$169.99 **ADD**

FREQUENTLY BOUGHT TOGETHER




3 Ton Steel Jack Stands

Item # 10189
Compare \$69.99
Only: \$21.99 **ADD**
[Add to My List](#)




6 Ton Steel Jack Stands

Item # 2020
Compare \$99.99
Only: \$44.99 **ADD**
[Add to My List](#)



1/2 in. Composite Ultra-Torque Air Impact Wrench

Item # 11781
Compare \$259.99
Only: \$149.99 **ADD**
[Add to My List](#)



40 in. 300 Lb. Capacity Low-Profile Creeper

Item # 2021
Compare \$119.99
Only: \$17.97 **ADD**
[Add to My List](#)

Product Overview | Customer Reviews | Warranty | User Manual

Description

DAYTONA

Here's a super duty 3 Ton floor jack that's designed to work as hard as you do. Premium quality piston seals plus an internal magnetic filtration system work together to extend pump life. Rapid Pump dual parallel pump technology lifts in far fewer strokes. The universal joint release provides precise load control for smooth descent.

- Best-in-class 3 Ton Professional Steel Jack is built to work longer and faster
- Innovative hydraulic pump system with internal magnetic filtration for extraordinary pump life
- Low profile design fits from 3-3/4 in. to 23-1/8 in.
- Heavy duty all-welded steel construction with durable finish
- Universal joint release provides precise load control in any handle position
- Rounded handle grip for secure hold, equipped with non-marring bumper to prevent damage to vehicle finish

Specifications

Name	3 Ton Daytona Professional Steel Floor Jack - Super Duty
SKU	63183
Brand	Daytona™
Material	Steel
Quantity	1
Handle Length (in.)	90-114 in.
Maximum Lift Height (in.)	23-1/8 in.

https://www.harborfreight.com/3-ton-daytona-professional-steel-floor-jack-super-duty-63183.html?utm_source=publitas&utm_medium=monthly-ad&utm_campaign=072017. A web server application is executed by the host computer and it provides the electronic and interactive representation to a computing device of a user in response to receiving input representing the page number.



Online Ad.

21. Tangelo is entitled to recover from Defendant the damages sustained by Tangelo as a result of Defendant's infringement of the '005 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

22. Defendant's use of Tangelo's patented technology has caused, is causing and will continue to cause Tangelo irreparable harm unless enjoined by this Court.

JURY DEMAND

Tangelo hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Tangelo requests that this Court enter judgment against Defendant as follows:

- A. An adjudication that Defendant has infringed the '005 patent;
- B. A permanent injunction enjoining Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with it, from making, using, offering to sell, or selling in the United States or importing into the United States any devices, methods or systems that infringe any claim of the '005 patent, or contributing to or inducing the same by others;
- C. An award of damages to be paid by Defendant adequate to compensate Tangelo for Defendant's past infringement of the '005 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- D. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Tangelo's reasonable attorneys' fees; and
- E. An award to Tangelo of such further relief at law or in equity as the Court deems just and proper.

Dated: August 8, 2017

/s/ Richard C. Weinblatt
Stamatios Stamoulis DE SB #4606
Richard C. Weinblatt DE SB #5080 – Lead Counsel
Stamoulis & Weinblatt LLC
Two Fox Point Centre
6 Denny Road, Suite 307
Wilmington, DE 19809
Telephone: (302) 999-1540
Facsimile: (302) 762-1688
stamoulis@swdelaw.com
weinblatt@swdelaw.com

/s/ L. Charles van Cleef

L. Charles van Cleef TX SB #00786305

Van Cleef Law Office

PO Box 2432

Longview, TX 75606-2432

Telephone: (903) 248-8244

Facsimile: (903) 248-8249 Facsimile

charles@vancleef.pro

Attorneys for Plaintiff

Tangelo IP, LLC