

IN THE UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

TANGELO IP, LLC)
)
 Plaintiff,)
) Civil Action No. 3:17-cv-2104
 v.)
) **JURY TRIAL DEMANDED**
 SAM ASH MUSIC CORPORATION)
)
 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 Sam Ash Music Corporation is a New York company with, upon information and belief, a place of business located at 10838 N. Central Expressway, Dallas, Texas 75231.
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 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.

ELECTRIC GUITARS

EVH

EVH STRIPED SERIES
STARTING AT \$899**
OR \$354/MONTH*
FOR 24 MONTHS**

The iconic guitar features a basswood body decked out in Eddie Van Halen's famed orange graphics. The guitar also has a quarter-sawn maple neck with a compound-radius maple fingerboard (7"–9 1/2") and a single Wolfgang humbucking pickup. Other premium features include a single volume volume control knob (labeled "tone"), Floyd Rose locking tremolo with EVH D-Tune, and EVH die-cast tuners. Case not included.

EP902828K YELLOW
\$899.99
LIST: \$1099.99

EP902828K RED \$899.99
LIST: \$1099.99

EVH WOLFGANG SPECIAL
\$999**
OR \$420/MONTH*
FOR 24 MONTHS**

Representing an exceptional value, the Wolfgang Special offers all the advantages, tone and class you'd expect from an EVH Wolfgang, but at a more modest price point. The arch-top basswood body comes fitted with a quarter-sawn maple neck, a compound-radius fingerboard with radiused edges and jumbo frets, and a pair of EVH Wolfgang humbucking pickups. The locking trem with D-Tune allows for obviously great intonation, the low V-bridge while facilitating the most intense vibrato and divebombs. Case not included.

EP797856K STEALTH BLACK
LIST: \$1279.99

SAM ASH CREDIT CARD
SEE PAGE 3 FOR DETAILS

Jackson

NEW! JACKSON PRO SERIES DINKY DK30M
\$999** OR \$420/MONTH*
FOR 24 MONTHS**

A true metal monster, the Jackson Pro Series Dinky DK30M offers a unique take on the classic Jackson shape. It sports an alder body equipped with a quilt maple top, a three-dimensional maple neck with a compound-radius (7"–10") fingerboard, and a 1000-gram of powerful Dimebag Duran pickups (8 in bridge, Custom Fat Strat in neck) in a serial-HSS configuration. Comes loaded up with high-performance black hardware including a Floyd Rose locking tremolo and Jackson die-cast tuners. Case not included.

J409212C CUCKOO BUNNET - LIST: \$1366.53

NEW! JACKSON PRO SERIES MISHA MANSOOR JUGGERNAUT HTS
\$799** OR \$340/MONTH*
FOR 24 MONTHS**

Jackson teamed up with Producer's Misha Mansoor to create a signature model within the most affordable HTS line. This one features a basswood body, a bolt-on maple speed neck, an ebony fingerboard with 24 jumbo frets and a set 18" radius, and ultra-responsive Jackson MHT humbuckers designed in close collaboration with Misha himself with variable toning switching and a push/pull Master Tone control. Comes equipped with premium black hardware. Case not included.

J409015S SATIN GUN METAL GEAR
LIST: \$1103.43

NEW! JACKSON X SERIES SOLOIST SLX ZEBRA WOOD
\$599** OR \$250/MONTH*
FOR 24 MONTHS**

Affordable but deadly, the X Series Soloist SLX features a beautiful zebrawood top over a basswood body and neck-through-body maple speed neck for outstanding tone, sustain, and attack. The compound-radius rosewood fingerboard allows for easy sliding and chording while Duran Designed humbuckers serve up ultra-tone. Comes with a high-performance Floyd Rose locking tremolo and Jackson tuners. Case not included.

J434180X - LIST: \$846.31

NEW! JACKSON JS SERIES KING V JS2
\$299**
OR \$130/MONTH* FOR 24 MONTHS**

An affordable one built for shredding, the regal Jackson JS Series King V JS2 sports a lightweight poplar body, a fast maple speed neck, a compound-radius (7"–10") rosewood fingerboard with 24 jumbo frets, and a set of Jackson High Output humbuckers for killer metal-ready tones. A Jackson-branded licensed Floyd Rose tremolo allows for intense divebombs while Jackson die-cast tuners offer outstanding tuning stability. Case not included.

J0223209S MATTE ANTHRACITE
LIST: \$399.99

NEW! JACKSON PRO SOLOIST SL20 MAH
\$999** OR \$420/MONTH*
FOR 24 MONTHS**

The SL20 is the perfect stereo-tone featuring a lightweight basswood body and ergonomic Soloist body shape, paired with a Duff Maple top. A maple maple neck carries a 17"-18" compound radius ebony fingerboard designed for high technical precision playing. Electronics include a set of Seymour Duncan Distortion humbucking pickups, with master volume and tone controls. Black metal hardware features a recessed Floyd Rose FRF-6000 double-locking tremolo bridge. Case not included.

J422288L AURA BURST
LIST: \$1366.53

NEW! JACKSON PRO SERIES MISHA MANSOOR JUGGERNAUT HTS
\$899** OR \$380/MONTH*
FOR 24 MONTHS**

The Pro Juggernaut HTS features a 24.5" scale length, basswood body with a flame-maple top, one-piece bolt-on maple speed neck, a 9 1/2" fat radius ebony fingerboard, comes 24 jumbo frets. Electronics include new Jackson MHT pickups, which can be shaped with a master volume and master tone control with push/pull and the active and passive switch. Black hardware includes a Jackson HTS 117 string-through-body tremolo bridge, Jackson die-cast locking tuners. Case not included.

J409788X - LIST: \$1041.37

NEW! JACKSON X SERIES KELLY KEXT \$699**
OR \$285/MONTH* FOR 24 MONTHS**

Offering ultra sound and pure Jackson playability & performance at an incredible value, the KEXT features a fully basswood body, a fast three-body 10c maple neck, and a 17"-18" compound radius rosewood fingerboard with 24 jumbo frets. Comes loaded up with a pair of powerful Jackson high-output humbuckers and chrome hardware including Jackson sealed die-cast tuners and a 1024c-16 bridge with anchored saddles. Case not included.

J409282A - LIST: \$846.31

NEW! JACKSON JS SERIES RHOADS 32 \$299**
OR \$130/MONTH* FOR 24 MONTHS**

The iconic Rhoads 32 is a lightweight and resonant poplar body, bolt-on maple speed neck with graphite reinforcement and scal frets, and a 17"-18" compound radius, fully bound rosewood fingerboard with 24 jumbo frets and pointed shaftline inlays. Other features include dual high-output Jackson humbucking pickups with ceramic magnets, master volume and tone controls, three-way toggle switches, black hardware, licensed Jackson-branded Floyd Rose licensed double-locking tremolo bridge and sealed die-cast tuners. Case not included.

J015667X - LIST: \$399.99

16 WE WILL BEAT ANY PRICE! LOWEST PRICE GUARANTEED FOR 60 DAYS!

Print Catalog.

0% INTEREST FOR 24 MONTHS*

WE WILL BEAT ANY PRICE! LOWEST PRICE GUARANTEED FOR 60 DAYS!

IF YOU FIND A LOWER ADVERTISED PRICE FROM ANY AUTHORIZED U.S. DEALER WITHIN 60 DAYS OF YOUR PURCHASE, WE WILL REFUND THE DIFFERENCE! SEE BACK COVER FOR DETAILS.

18-19 / 164

SHARE

ISSUU

http://samashmusic.com/catalog/ (“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.

EVH Striped Series Electric Guitar

★★★★★ [READ 16 REVIEWS](#) | [WRITE A REVIEW](#) | [0 QUESTIONS](#) | [0 ANSWERS](#) | [ASK A QUESTION](#)

SKU: E7902526X



Hover to zoom

Images (1)



Recommended Accessories



EVH Premium Electric Guitar Strings (9-46)

★★★★★ **5.0**

(1 review)

MSRP: \$42.99

\$6.35

Save: \$36.64 (86%)

[+ Add to Cart](#)



EVH Signature Picks & Tin (12 Picks)

★★★★★ **5.0**

(1 review)

MSRP: \$44.99

\$6.85

Save: \$38.14 (85%)

[+ Add to Cart](#)



MXR EVH90 Phase 90 Guitar Effects Pedal

☆☆☆☆☆ **0.0**

(No reviews)

MSRP: \$46.70

\$129.99

Save: \$85.71 (30%)

[+ Add to Cart](#)

You May Also Be Interested In



\$899.99



Limited Time Offer

ONLY \$38 PER MONTH!*

0% Interest for 24 Months*

On select purchases \$299 or more with your Sam Ash card now thru 12/31/17. 24-equal monthly payments required.

[Click here for details](#)

*Color:

Black with Yellow Stripes

[More on the way - call 800-472-6274 or chat for availability](#)

\$899.99

QTY: 1

[Add to Cart](#)

[Seen A Better Price?](#)

[Add to Wish List](#)

[Add to Compare List](#)



STORE PICKUP

[Select A Store](#)

- 90-Day Price Protection
- This Item Ships Free!
- 45-Day Return Policy

[Like](#) [18](#) [Share](#)

[Twitter](#) [Google+](#)

[Pinterest](#)

[Description](#) | [Reviews](#) | [Discussions](#) | [Specs](#) | [More Info](#)

The EVH Striped Series guitar decked out in Eddie Van Halen's famed striped graphics

EVH is proud to release the EVH Striped Series guitars, which feature basswood Stratocaster®-style bodies decked out in Eddie Van Halen's famed striped graphics. The three versions are red/white/black, black with yellow stripes and white with black stripes.

This series also has a quartersawn maple neck with a hand-rubbed oil finish and thumbwheel truss rod adjustment, compound-radius maple fingerboard (12"-16") with 22 Jumbo frets and black dot inlays, plus a single ferocious direct-mount Wolfgang® humbucking pickup. Other premium features include a single volume control knob (labeled "tone"), single-ply black pickguard (on the white and black striped model only), bar string retainer and Floyd Rose® locking nut, EVH-branded Floyd Rose® locking tremolo with EVH D-Tuna®, EVH die-cast tuners, chrome hardware, vintage-style strap buttons and EVH neck plate.

<http://www.samash.com/evh-striped-series-electric-guitar-red-with-black-stripes-e7902503x>.

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.



ELECTRIC GUITARS

EVH

EVH STRIPED SERIES
STARTING AT \$899
OR 12% 24 MONTHS*
FOR 24 MONTHS*

These iconic electric guitars are hand-crafted by EVH and feature a limited-edition design. The guitars are made of alder and feature a 24 fret maple neck with a 100% maple fretboard. The EVH Striped Series guitars are available in a variety of colors, including the iconic yellow and black stripes.

PROSSER RED \$999.99
LIST \$1099.99

EVH WOLFGANG SPECIAL \$999
OR 12% 24 MONTHS*
FOR 24 MONTHS*

Representing an exceptional value, the Wolfgang Special electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The Wolfgang Special electric guitar is available in a variety of colors, including the iconic black and white stripes.

EVH JASON KISS \$999.99
LIST \$1099.99

SAM ASH CREDIT CARD

SEE PAGE 1 FOR DETAILS

NEW! JACKSON PRO SERIES DINKY DICKSON \$999.99 OR 12% 24 MONTHS* FOR 24 MONTHS*

A true rock guitar, the Dinky Dickson electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The Dinky Dickson electric guitar is available in a variety of colors, including the iconic black and white stripes.

NEW! JACKSON PRO SERIES SOLICIT \$1,200.00 \$999.99 OR 12% 24 MONTHS* FOR 24 MONTHS*

The SOLICIT is the perfect electric guitar for the rock and roll musician. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The SOLICIT electric guitar is available in a variety of colors, including the iconic black and white stripes.

NEW! JACKSON PRO SERIES MEUSA MANSCOR JUGGERNAUT HTFM 7-STRING \$1,799.99 OR 12% 24 MONTHS* FOR 24 MONTHS*

The Pro Juggernaut HTFM features a 24.75" scale length, a humbucker pickup with a 500k potentiometer, and a 24 fret maple neck with a 100% maple fretboard. The JUGGERNAUT HTFM 7-STRING electric guitar is available in a variety of colors, including the iconic black and white stripes.

NEW! JACKSON X SERIES SOLOIST SLX ZEBRA WOOD \$999.99 OR 12% 24 MONTHS* FOR 24 MONTHS*

Available for only \$999.99, the Zebra Wood electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The Zebra Wood electric guitar is available in a variety of colors, including the iconic black and white stripes.

NEW! JACKSON JS SERIES KING V JS32 \$2,099.99 OR 12% 24 MONTHS* FOR 24 MONTHS*

Available for only \$2,099.99, the KING V JS32 electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The KING V JS32 electric guitar is available in a variety of colors, including the iconic black and white stripes.

0% INTEREST FOR 24 MONTHS*

FINANCING OFFER: 0% INTEREST FOR 24 MONTHS* ON PURCHASES UP TO \$5,000. SEE STORE FOR DETAILS.

NEW! STERLING BY MUSIC MAN JOHN PETRUCCI MAJESTY MAJ100 \$999

Made to meet the demands of those that love the sound of John Petrucci, the MAJESTY MAJ100 electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The MAJESTY MAJ100 electric guitar is available in a variety of colors, including the iconic black and white stripes.

STERLING BY MUSIC MAN JPSOL JOHN PETRUCCI SIGNATURE \$999

A true masterpiece, the JPSOL electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The JPSOL electric guitar is available in a variety of colors, including the iconic black and white stripes.

STERLING BY MUSIC MAN STINGRAY \$999

The Stingray electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The Stingray electric guitar is available in a variety of colors, including the iconic black and white stripes.

NEW! STERLING BY MUSIC MAN SUELE SERIES \$433 \$299

The SUELE electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The SUELE electric guitar is available in a variety of colors, including the iconic black and white stripes.

NEW! ERNIE BALL MUSIC MAN JOHN PETRUCCI MAJESTY MAJ100 \$999

Made to meet the demands of those that love the sound of John Petrucci, the MAJESTY MAJ100 electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The MAJESTY MAJ100 electric guitar is available in a variety of colors, including the iconic black and white stripes.

NEW! ERNIE BALL MUSIC MAN JOHN PETRUCCI SIGNATURE \$999

A true masterpiece, the JOHN PETRUCCI SIGNATURE electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The JOHN PETRUCCI SIGNATURE electric guitar is available in a variety of colors, including the iconic black and white stripes.

NEW! ERNIE BALL MUSIC MAN JAMES VALENTE SIGNATURE \$999

A true masterpiece, the JAMES VALENTE SIGNATURE electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The JAMES VALENTE SIGNATURE electric guitar is available in a variety of colors, including the iconic black and white stripes.

NEW! ERNIE BALL MUSIC MAN JOHN PETRUCCI MAJESTY MAJ100 \$999

Made to meet the demands of those that love the sound of John Petrucci, the MAJESTY MAJ100 electric guitar is a true masterpiece. The guitar is made of alder and features a 24 fret maple neck with a 100% maple fretboard. The MAJESTY MAJ100 electric guitar is available in a variety of colors, including the iconic black and white stripes.

www.samash.com/wolfgang-special-electric-guitar-steath-black-e770156x

NEED FOR 60 DAYS!

IF YOU FIND A LOWER ADVERTISED PRICE FROM ANY AUTHORIZED U.S. DEALER WITHIN 60 DAYS OF YOUR PURCHASE, WE WILL REFUND THE DIFFERENCE! SEE BACK COVER FOR DETAILS.

18-19 / 164

Online Ad.

+ @issuu

EVH Wolfgang Special Electric Guitar

★★★★★ [READ A REVIEW](#) | [WRITE A REVIEW](#) | [1 QUESTION](#) | [1 ANSWER](#) | [ASK A QUESTION](#)

SKU: 67701585X



Images (1)



\$999.99



Limited Time Offer

ONLY \$42 PER MONTH!*

0% Interest for 24 Months*

On select purchases \$299 or more with your Sam Ash card now thru 12/31/17. 24-equal monthly payments required.

[Click here for details](#)

*Color:

Stealth Black

✓ In Stock & Ready to Ship!

\$999.99

QTY: 1

Add to Cart

See A Dealer Price?

Add to Wish List

Add to Compare List



STORE PICKUP

Select A Store

- 60-Day Price Protection
- Free Item Ships Free!
- 45-Day Return Policy

Like 0 Share

Twitter

Google+

Print

Description | Reviews | Discussions | Specs | More Info

Representing an exceptional value, the Wolfgang Special offers all the playability, tone and class you'd expect from an EVH Wolfgang, but at a more modest price point.

Over 35 years of Eddie Van Halen's experience, knowledge and experimentation have been distilled into the Wolfgang Special. Tested, tweaked, and refined on the road, this purebred music-making machine places the same highly responsive performance and sound in your hands. With stunning style, giant sound and high-speed playability along with player-oriented features, it's ready to crank out some serious rock.

The robust graphite-reinforced quarter-sawn maple neck—carved and rolled to EVH's exacting specifications—supports a speedy 12"-18" compound radius maple fingerboard, facilitating energetic riffing and blazing leads. Twenty-two jumbo frets take every bend with ease without affecting the instrument's natural tone, allowing every note to ring true. The crystal clear Custom Designed EVH Wolfgang Humbucking pickups are mounted directly to the basswood body, supplying girth and sparkle, as well as near-endless sustain to power chords and melody lines. The rock-solid EVH-branded Floyd Rose Locking Trem combines with the Floyd Rose Locking nut to maintain precise tuning, no matter how insane your whammy-bar histrionics get. The EVH D-Tune returns to Drop-D and back with strict accuracy at the mere flick of a finger, making this the only guitar you'll need onstage (your tech will thank you).

Every component of the guitar has been selected and positioned for high-speed playing. The low-friction volume knob lets you perform speedy volume swells with ease while the tone knob resists easy turning—avoiding unwanted tonal shifts as your picking hand flies furiously across the strings. The EVH DNA injected into this monster of a guitar makes the Wolfgang Special a hard-rocking machine that begs to be unleashed so you can tear it up! Case not included.

Get your EVH Wolfgang Special electric guitar today at the guaranteed lowest price from Sam Ash Direct with our 45-day return and 60-day price protection policy.



Things You Will Get:

- Electric Guitar

Recommended Accessories



EVH Signature Picks & Tin (12 Picks)

★★★★★ (1 review)

MSRP: \$44.99
\$8.89
Save: \$36.10 (80%)

Add to Cart



Dunlop EVH Signature Van Halen Signature Wah Guitar Effects...

★★★★★ (No reviews)

MSRP: \$267.99
\$189.99
Save: \$78.00 (29%)

Add to Cart



EVH Premium Electric Guitar Strings (9-48)

★★★★★ (1 review)

MSRP: \$43.99
\$8.99
Save: \$35.00 (79%)

Add to Cart

You May Also Be Interested In



EVH Striped Series Electric Guitar

★★★★★ (13 reviews)

MSRP: \$1,099.99
\$699.99 to \$999.99

Just \$38 per month!
0% Interest/24 Months!
[Click here for details](#)

Add to Cart



EVH Striped Series Sitar Electric Guitar

★★★★★ (1 review)

MSRP: \$4,537.99
\$1,099.99
Save: \$3,438.00 (76%)

Just \$46 per month!
0% Interest/24 Months!
[Click here for details](#)

Add to Cart



EVH Wolfgang Special I.O.M. Electric Guitar

★★★★★ (No reviews)

MSRP: \$1,099.99
\$949.99 to \$999.99

Just \$40 per month!
0% Interest/24 Months!
[Click here for details](#)

Add to Cart

http://www.samash.com/wolfgang-special-electric-guitar-stealth-black-e7701568x.

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.

The screenshot shows a webpage for Sam Ash Music featuring a collection of electric guitars. At the top, there is a banner for the 'SAM ASH CREDIT CARD' offering '0% INTEREST FOR 24 MONTHS'. Below this, several guitar models are displayed in a grid, each with a brief description and price. Brands visible include Jackson, Sterling, and Ernie Ball Musicman. At the bottom of the grid, a banner reads 'WE WILL BEAT ANY PRICE! LOWEST PRICE GUARANTEED FOR 60 DAYS!'. The page also includes navigation arrows, a search bar, and a 'SHARE' button in the top right corner.

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 9, 2017

Respectfully submitted,
By: /s/ Hao Ni
Hao Ni
Texas Bar No. 24047205
hni@nilawfirm.com
NI, WANG & MASSAND, PLLC
8140 Walnut Hill Ln., Ste. 500
Dallas, TX 75231
Tel: (972) 331-4600
Fax: (972) 314-0900

Of Counsel

Stamatios Stamoulis DE SB #4606
Richard C. Weinblatt DE SB #5080
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

*Attorneys for Plaintiff
Tangelo IP, LLC*