

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

TANGELO IP, LLC)	
)	
Plaintiff,)	
)	Civil Action No. 1:18-cv-1711
v.)	
)	JURY TRIAL DEMANDED
HAMMACHER SCHLEMMER &)	
COMPANY, 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 Hammacher Schlemmer & Company, Inc. is a New York company with, upon information and belief, a place of business located at 147 E. 57th Street, New York, New York 10022.

3. By forming its company in New York and having a store in New York, Defendant has a permanent and continuous presence in New York.

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. The claims of the '005 patent specifically address a technological problem – inability to use a computer to locate additional information about products shown in visual media sources, such as failure to provide instantaneous product descriptions and separate enlarged views of each of the products shown within the image – via an unconventional technological solution. For example, the claimed graphical user interface includes prescribed functionality directly related to the graphical user interface's structure that addresses and resolves a specifically identified problem in the prior art

18. In further detail, printed publications in traditional media, such as newspaper or magazine advertisements could not be associated with, or "hot-linked" to, additional sources of information like electronic files, Ex. A at 1:46-50, and conventional visual media present in some electronic publications (including video sources) on the Internet did not provide a breakdown of products forming the digital or electronic image contained within the electronic

publication. *Id.* at 2:32-36. The claims of the '005 patent describe an approach to accomplishing a specific, practical, and useful improvement to traditional or conventional visual media, by creating a graphical user interface. *Id.* at 3:3-4:11.

19. The claims of the '005 patent do not perform some fundamental practice long prevalent in our system, as confirmed by the specification's criticism of prior art and the explanation as to how the claimed inventions solve the prior art's inadequacies. *See id.* at 1:40-2:50, 3:3-4:11.

20. The '005 patent's claims entail an unconventional technological solution to a technological problem. The '005 patent describes how its particular arrangements of elements is a technical improvement over prior art, *id.* at 3:3-4:11, and the particular arrangements are claimed.

21. The claims of the '005 patent have an obvious technological effect: they aid in the technological goal of creating a graphical user interface that displays an interactive electronic representation of a corresponding visual media object that can associate a visual media object contained within an electronic publication to an interactive electronic representation of a visual media object. These are not claims that contain mere token references to a computer or its use; instead, these claims are inherently tied to computers and the Internet.

22. The claims of the '005 patent improve the computer functionality. The '005 patent explains, for example, that the prior art's "severe limitations on the depth of content provided by traditional visual media can be very frustrating for readers, viewers, and in particular, shoppers," *id.* at 1:53-55, and "[t]he reader may turn to a web search engine for assistance, but without knowing the manufacturer of [the product shown] or other information, any Internet search by the reader is likely to be futile." *Id.* at 1:63-66. Likewise, "[c]onventional electronic

publications generally do not provide instantaneous product descriptions and separate enlarged views of each of the products shown within the image", *id.* at 2:37-40, and if the reader seeks additional information about products shown in the image, "the reader may need to initiate an Internet or web search to ascertain" more information and "[s]uch an Internet search could be rather time consuming without any guarantee of success." *Id.* at 2:43-50. The '005 patent thus is directed to solving this Internet-centric problem by creating a graphical user interface that displays an interactive electronic representation of a corresponding visual media object that can associate a visual media object contained within an electronic publication to an interactive electronic representation of a visual media object.

23. The prior art to the '005 patent did not permit the usability permitted by the claimed inventions of the '005 patent. When the limitations of the '005 patent's claims are taken together as an ordered combination, the claims recite an invention that is not merely the routine or conventional use of the Internet or a computer replicating a printed publication.

24. The '005 patent's claims do not preempt a broad building block that would unduly obstruct innovation. Instead, the claims describe a very specific means for a computer to display a graphical user interface that includes an interactive and electronic replication of a corresponding physical publication page or a portion thereof. There is no risk that the claims could foreclose innovation by others.

25. 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

26. Tangelo repeats and realleges the allegations of paragraphs 1 through 25 as if

fully set forth herein.

27. 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.

28. 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.

The Pinchless Electrolysis Hair Remover
This is the home electrolysis used with a non-invasive tool to remove hair without the painful pinching of waxes, electrolysis or the expense of laser treatments. Explaining the same technology used by professionals, the hand-holding a handheld electrical current that, with regular use, destroys permanent hair cells, preventing the hair from ever growing back. Within 60 days of regular use, you will see a noticeable decrease in unwanted hair on the face, underarms, legs, or bikini line. Unlike laser treatments that are ineffective on light-colored hair, this new device can remove hair on all skin tones. The LED light up when the roller tip contacts the skin gently to ensure the most effective treatment. Includes an essential conditioning gel pack to treat larger areas. Two interchangeable roller tips, pre-application cleaning gel, conditioner gel, accessories, full operating manual, and two hair testers. **MSRP \$149.95**
Replacement Cartridge Gel, 3oz. tube, ED-43732 \$19.95

The Non-Slip Furniture Protecting Pet Covers
Designed only for non-toxic fabrics, these are the ultimate covers that protect furniture from pet hair and damage without the chemical content of other covers. Made from plush, denim-like fabric, they are soft, comfortable and durable against the scratches, moisture, and other pet messes. An acrylic coat on the fabric gets to the floor or carpeting before the hair or a source of moisture. The cushions have a textured non-slip backing that ensures a cover will slip when it belongs without bunching, sliding, or adding extra conditioning time. The generously sized covers will spread across furniture seats and over armrests while their double-strap seat fasteners, featuring soft foam strips, their quilted sections are lined with additional padding for comfort and support. Available in three colors in regular machine washing. (Size 80) With convenient armrest pockets. **MSRP \$69.95**
Medium, Covers 14" W x 40" L (3.5 lbs.) ED-48722 \$69.95
Large, Covers 16" W x 40" L (4.5 lbs.) ED-48723 \$119.95
X-Large, Covers 18" W x 40" L (5.5 lbs.) ED-48724 \$169.95
Queen, Covers 20" W x 40" L (6.5 lbs.) ED-48725 \$219.95

The Walk On Air Boat Shoes
Designed specifically for non-toxic fabrics, these are the ultimate shoes that protect furniture from pet hair and damage without the chemical content of other covers. Made from plush, denim-like fabric, they are soft, comfortable and durable against the scratches, moisture, and other pet messes. An acrylic coat on the fabric gets to the floor or carpeting before the hair or a source of moisture. The cushions have a textured non-slip backing that ensures a cover will slip when it belongs without bunching, sliding, or adding extra conditioning time. The generously sized covers will spread across furniture seats and over armrests while their double-strap seat fasteners, featuring soft foam strips, their quilted sections are lined with additional padding for comfort and support. Available in three colors in regular machine washing. (Size 80) With convenient armrest pockets. **MSRP \$69.95**
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X-Large, Covers 18" W x 40" L (5.5 lbs.) ED-48724 \$169.95
Queen, Covers 20" W x 40" L (6.5 lbs.) ED-48725 \$219.95

The Organized Traveler's Ultra Light Carry On
This compact carry-on bag is made from a lightweight, durable fabric with a soft interior lining. It features a top handle, a shoulder strap, and a detachable bag for a laptop or tablet. The carry-on is designed to fit in overhead bins and has a front pocket for easy access to travel documents and other essentials. **MSRP \$149.95**
Medium, Covers 14" W x 40" L (3.5 lbs.) ED-48722 \$69.95
Large, Covers 16" W x 40" L (4.5 lbs.) ED-48723 \$119.95
X-Large, Covers 18" W x 40" L (5.5 lbs.) ED-48724 \$169.95
Queen, Covers 20" W x 40" L (6.5 lbs.) ED-48725 \$219.95

The Hypnotic Jellyfish Aquarium
Offered only by manufacturer, this is the LED-lit aquarium that provides a mesmerizing, hypnotic display of jellyfish. The aquarium has 18 LED lights that create a soft, blue glow, and the jellyfish are illuminated from within. The aquarium is made of clear acrylic and has a sleek, modern design. **MSRP \$149.95**
Medium, Covers 14" W x 40" L (3.5 lbs.) ED-48722 \$69.95
Large, Covers 16" W x 40" L (4.5 lbs.) ED-48723 \$119.95
X-Large, Covers 18" W x 40" L (5.5 lbs.) ED-48724 \$169.95
Queen, Covers 20" W x 40" L (6.5 lbs.) ED-48725 \$219.95

The Walker's Foldaway Treadmill
Available only by manufacturer, this is the treadmill that folds down to a compact size for easy storage. The treadmill has a 2.2 HP motor and a 12" x 42" running surface. It features a foldable frame and a built-in carrying handle. **MSRP \$149.95**
Medium, Covers 14" W x 40" L (3.5 lbs.) ED-48722 \$69.95
Large, Covers 16" W x 40" L (4.5 lbs.) ED-48723 \$119.95
X-Large, Covers 18" W x 40" L (5.5 lbs.) ED-48724 \$169.95
Queen, Covers 20" W x 40" L (6.5 lbs.) ED-48725 \$219.95

The Foldaway 20 MPH Transporter
This is the ultimate three-wheeled transporter that provides a top speed of 20 mph on both roads and off-road. It features a 200W motor and a 12" x 42" running surface. **MSRP \$149.95**
Medium, Covers 14" W x 40" L (3.5 lbs.) ED-48722 \$69.95
Large, Covers 16" W x 40" L (4.5 lbs.) ED-48723 \$119.95
X-Large, Covers 18" W x 40" L (5.5 lbs.) ED-48724 \$169.95
Queen, Covers 20" W x 40" L (6.5 lbs.) ED-48725 \$219.95

The Year Of Your Birth Folding Knife
This is the folding pocket knife personalized with a brilliant, engraved design. The knife has a 4.2" blade and a 4.2" handle. It features a stainless steel blade and a handle made of wood. **MSRP \$149.95**
Medium, Covers 14" W x 40" L (3.5 lbs.) ED-48722 \$69.95
Large, Covers 16" W x 40" L (4.5 lbs.) ED-48723 \$119.95
X-Large, Covers 18" W x 40" L (5.5 lbs.) ED-48724 \$169.95
Queen, Covers 20" W x 40" L (6.5 lbs.) ED-48725 \$219.95

Print Catalog.

The screenshot displays a grid of product categories on the left, including items 6-7, 8-9, 10-11, 12-13, 14-15, and 16-17. The main content area features detailed descriptions and images for several products:

- The Pinchless Electrolysis Hair Remover:** A handheld device for hair removal. Description: "This is the laser electrolysis used with a non-heating ball tip that removes hair without the painful pricking of needle electrolysis..." Price: \$249.95.
- Protecting Pet Covers:** Washable covers for furniture. Description: "Developed only for Hammacher Schlemmer, these are the washable covers that protect furniture from pet hair and damage without the slippery common to lesser models..." Price: \$149.95.
- The Walk On Air Boat Shoes:** Shoes with air soles. Description: "The non-slip Furniture Protecting Pet Covers..." Price: \$149.95.
- The Organized Traveler's Ultra Light Carry On:** A travel bag. Description: "This compact carry-on bag..." Price: \$149.95.
- The Hypnotic Jellyfish Aquarium:** A decorative aquarium. Description: "Developed only for Hammacher Schlemmer, this is the LED-lit desktop aquarium..." Price: \$249.95.
- The Foldaway 20 MPH Transporter:** A three-wheeled transporter. Description: "This is the electric three-wheeled transporter that accommodates..." Price: \$279.95.
- The Walker's Foldaway Treadmill:** A treadmill. Description: "Available only from Hammacher Schlemmer, this is the versatile treadmill that folds to only 10" high for unobstructed storage..." Price: \$279.95.
- The Year of Your Birth Folding Knife:** A folding knife. Description: "This is the folding pocket knife personalized with a brilliant, engraved (laser) pattern..." Price: \$29.95.

https://www.hammacher.com/OnlineCatalog/ ("Online Catalog"). 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.

This section provides a closer look at the product descriptions and images from the catalog:

- The Pinchless Electrolysis Hair Remover:** Image of a woman using the device. Price: \$249.95.
- The Non-Slip Furniture Protecting Pet Covers:** Image of a pet cover on a chair. Price: \$149.95.
- The Walk On Air Boat Shoes:** Image of a brown leather shoe. Price: \$149.95.
- The Organized Traveler's Ultra Light Carry On:** Image of a travel bag. Price: \$149.95.
- The Hypnotic Jellyfish Aquarium:** Image of the aquarium. Price: \$249.95.
- The Foldaway 20 MPH Transporter:** Image of the transporter. Price: \$279.95.
- The Walker's Foldaway Treadmill:** Image of the treadmill. Price: \$279.95.
- The Year of Your Birth Folding Knife:** Image of the folding knife. Price: \$29.95.

Print Catalog.

The Pinchless Electrolysis Hair Remover
This is the latest electrolysis tool with a smooth rolling ball tip that removes hair without the painful pinching of needles attached to the electrode.

The Hypnotic Jellyfish Aquarium
This is the only 10-gallon aquarium that is the LED light fixture mounted with two synthetic jellyfish that glow in the dark.

The Walker's Foldaway Treadmill
Available only from Hammacher Schlemmer. This is the most compact treadmill that folds to only 14" deep for convenient storage.

The Foldaway 20 MPH Transporter
This is the electric three-wheeled transporter that accelerates to a top speed of 20 mph and folds easily for compact storage.

The Organized Traveler's Ultra Light Carry On
The ultra-light bag also contains built-in compartments that hold all bathroom necessities.

The Year of Your Birth Folding Knife
This is the folding pocket knife personalized with a brilliant, personalized custom pattern and a monogram to honor an important birth year.

Online Catalog. 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.

The Hypnotic Jellyfish Aquarium

Offered only by Hammacher Schlemmer, this is the LED-lighted desktop aquarium with two synthetic jellyfish that provide mesmerizing ambience just like their real counterparts. The aquarium has 18 LEDs (six each of red, blue, and green) that automatically gently change color, causing both jellyfish to "react" by glowing yellow, purple, aquamarine, blue, and red as they float within gentle currents generated by the unit's silent, integrated motor. Manual color selection enables one color display. Set up on a bookshelf, tabletop, or desk, the aquarium plugs into AC, automatically turns off after four hours. 13 3/4" H x 5 1/2" Diam. 176 lbs. RD-89171 \$89.95

The Foldaway 20 MPH Transporter

This is the electric three-wheeled transporter that accelerates to a top speed of 20 mph yet folds easily for compact storage. It's powered by a 500-watt motor and features double wishbone suspension and a sturdy aluminum alloy frame that ensures smooth rides over uneven terrain. The scooter's two front 10" pneumatic tires and rear 8" urethane foam tire grip pavement while a thumb-actuated electronic brake reduces speed. Its display panel provides power, speed, and mileage readouts, and enables one to activate cruise control and operate its 24 LED headlights. With a slip-resistant deck that supports up to 220 lbs., its 48-watt rechargeable battery provides a 20-mile range on a six-hour charge via the included AC adapter. White or Black. 47" L x 44" H x 24" W (47 lbs.) RD-13240 \$1,190.00



6 hammacher.com

The Walker's Foldaway Treadmill

Available only from Hammacher Schlemmer, this is the motorless treadmill that folds to only 14" deep for underfloor storage. The treadmill's resistance is created by magnetic force, eliminating the need for AC power and allowing set up anywhere in a home. It has a sturdy steel frame with padded handrails that help walkers up to 250 lbs. maintain balance, a 47" L x 12 1/2" W textured non-slip track, and a battery-powered monitor compares one AA battery that tracks time, speed, distance, heart rate, and calories burned. With four incline heights, heart rate sensors built into the handbars, and eight levels of resistance, integrated wheels allow easy relocation. Assembly required. Deployed 47" H x 20" W x 44" D. Folded 47" H x 20" W x 14" D. 148 lbs. RD-83905 \$279.95



The Year Of Your Birth Folding Knife

This is the folding pocket knife personalized with a brilliant, unscratched Lincoln penny and a monogram to honor an important birth year. The penny, which can represent any year between 1943 and the present, is embedded in the elegantly curved handle. The 7 stainless-steel blades bear the classically styled monogram, with the prominent family name initial in the center flanked by the smaller first and middle name initials. The handsome knife unfolds from its wooden handle to 7 1/2" long. It is accompanied by a detailed history of world facts and highlights from the chosen year. Initials must be supplied in this order: first initial, last initial and middle initial. The year 1943 is not available. RD-13143 \$99.95.00



6 hammacher.com

The Hypnotic Jellyfish Aquarium

Offered only by Hammacher Schlemmer, this is the LED-lighted desktop aquarium with two synthetic jellyfish that provide mesmerizing ambience just like their real counterparts. The aquarium has 18 LEDs (six each of red, blue, and green) that automatically gently change color, causing both jellyfish to "react" by glowing yellow, purple, aquamarine, blue, and red as they float within gentle currents generated by the unit's silent, integrated motor. Manual color selection enables one color display. Set up on a bookshelf, tabletop, or desk, the aquarium plugs into AC, automatically turns off after four hours. 13 3/4" H x 5 1/2" Diam. 176 lbs. RD-89171 \$89.95



More info

The Foldaway 20 MPH Transporter

This is the electric three-wheeled transporter that accelerates to a top speed of 20 mph yet folds easily for compact storage. It's powered by a 500-watt motor and features double wishbone suspension and a sturdy aluminum alloy frame that ensures smooth rides over uneven terrain. The scooter's two front 10" pneumatic tires and rear 8" urethane foam tire grip pavement while a thumb-actuated electronic brake reduces speed. Its display panel provides power, speed, and mileage readouts, and enables one to activate cruise control and operate its 24 LED headlights. With a slip-resistant deck that supports up to 220 lbs., its 48-watt rechargeable battery provides a 20-mile range on a six-hour charge via the included AC adapter. White or Black. 47" L x 44" H x 24" W (47 lbs.) RD-13240 \$1,190.00



6 hammacher.com

The Walker's Foldaway Treadmill

Available only from Hammacher Schlemmer, this is the motorless treadmill that folds to only 14" deep for underfloor storage. The treadmill's resistance is created by magnetic force, eliminating the need for AC power and allowing set up anywhere in a home. It has a sturdy steel frame with padded handrails that help walkers up to 250 lbs. maintain balance, a 47" L x 12 1/2" W textured non-slip track, and a battery-powered monitor compares one AA battery that tracks time, speed, distance, heart rate, and calories burned. With four incline heights, heart rate sensors built into the handbars, and eight levels of resistance, integrated wheels allow easy relocation. Assembly required. Deployed 47" H x 20" W x 44" D. Folded 47" H x 20" W x 14" D. 148 lbs. RD-83905 \$279.95



The Year Of Your Birth Folding Knife

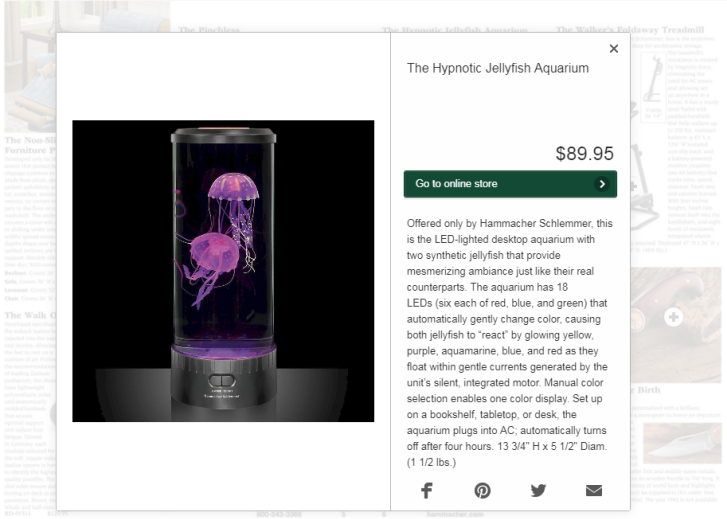
This is the folding pocket knife personalized with a brilliant, unscratched Lincoln penny and a monogram to honor an important birth year. The penny, which can represent any year between 1943 and the present, is embedded in the elegantly curved handle. The 7 stainless-steel blades bear the classically styled monogram, with the prominent family name initial in the center flanked by the smaller first and middle name initials. The handsome knife unfolds from its wooden handle to 7 1/2" long. It is accompanied by a detailed history of world facts and highlights from the chosen year. Initials must be supplied in this order: first initial, last initial and middle initial. The year 1943 is not available. RD-13143 \$99.95.00



6 hammacher.com

On mouseover, a clickable "More Info" box pops up

Online Catalog.



Id.

Home > Home Living > Home Decorating



Hover and click to magnify, click again to zoom.



The Hypnotic Jellyfish Aquarium

Offered only by Hammacher Schlemmer, this is the LED-lit desktop aquarium with two synthetic jellyfish that provide mesmerizing ambience just like their real counterparts. The aquarium has 18 LEDs (six each of red, blue, and green) that automatically gently change color, causing both jellyfish to "react" by glowing yellow, purple, aquamarine, blue, and red as they float within gentle currents generated by the unit's silent, integrated motor. Manual color selection enables one color display. Set up on a bookshelf, tabletop, or desk, the aquarium plugs into AC; automatically turns off after four hours. 13 3/4" H x 5 1/2" Diam. (1 1/2 lbs.)

Description	Reviews ★★★★★	Lifetime Guarantee
Item 89171	Price \$89.95	How Many? <input type="text" value="1"/>
Available for Immediate Shipment.		
		Add Gift Wrap for \$7.95 <input type="checkbox"/>

[Add To Shopping Bag](#)

May we recommend:



https://www.hammacher.com/Product/Default.aspx?sku=89171&source=PUBLITAS&cm_ven=publitas. 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.

The Hypnotic Jellyfish Aquarium

Available only from Hammacher Schlemmer, this is the LED-lit desktop aquarium with two synthetic jellyfish that provide mesmerizing ambience just like their real counterparts. The aquarium has 18 LEDs (six each of red, blue, and green) that automatically gently change color, causing both jellyfish to "react" by glowing yellow, purple, aquamarine, blue, and red as they float within gentle currents generated by the unit's silent, integrated motor. Manual color selection enables one color display. Set up on a bookshelf, tabletop, or desk, the aquarium plugs into AC; automatically turns off after four hours. 13 3/4" H x 5 1/2" Diam. (1 1/2 lbs.) RD-89171 \$89.95

The Foldaway 20 MPH Transporter

This is the electric three-wheeled transporter that accelerates to a top speed of 20 mph yet folds easily for compact storage. It's powered by a 500-watt motor and features double wishbone suspension and a sturdy aluminum alloy frame that ensures smooth rides over uneven terrain. The scooter's two front 10" pneumatic tires and rear 8" pneumatic from the grip pavement while a thumb-actuated electronic brake reduces speed. Its display panel provides power, speed, and mileage readouts, and enables one to activate cruise control and operate its 24 LED headlights. With a slip-resistant deck that supports up to 220 lbs., its 48-watt rechargeable battery provides a 20-mile range from a six-hour charge via the included AC adapter. White or black. 47" L x 14" W x 20" H (47 lbs.) RD-13240 \$1,750.88

The Walker's Foldaway Treadmill

Available only from Hammacher Schlemmer, this is the motorized treadmill that folds to only 14" deep for unobtrusive storage. The treadmill's resistance is created by magnetic force, eliminating the need for AC power and allowing set up anywhere in a home. It has a sturdy steel frame with padded handrails that help walkers up to 250 lbs. maintain balance. A 47" L x 12 1/2" W motorized non-slip track, and a battery-powered monitor requires one AA battery that tracks time, speed, distance, heart rate, and calories burned. With four incline heights, heart rate sensors built into the handrails, and eight levels of resistance, integrated wheels allow easy relocation. Assembly required. Deployed 47" H x 20" W x 44" D. Folded 47" H x 20" W x 14" D. (68 lbs.) RD-83905 \$279.95

The Year Of Your Birth Folding Knife

This is the folding pocket knife personalized with a brilliant, unscratched Lincoln penny and a monogram to honor an important birth year. The penny, which can represent any year between 1943 and the present, is embedded in the elegantly curved handle. The 3" stainless-steel blade bears the classically styled monogram, with the prominent family name initial in the center flanked by the smaller first and middle name initials. The handsome knife unfolds from its wooden handle to 7 1/2" long. It is accompanied by a detailed history of world facts and highlights from the chosen year. Initials must be supplied in this order: first initial, last initial and middle initial. The year 1943 is not available. RD-13143 \$99.95.88

The Hypnotic Jellyfish Aquarium

Offered only by Hammacher Schlemmer, this is the LED-lit desktop aquarium with two synthetic jellyfish that provide mesmerizing ambience just like their real counterparts. The aquarium has 18 LEDs (six each of red, blue, and green) that automatically gently change color, causing both jellyfish to "react" by glowing yellow, purple, aquamarine, blue, and red as they float within gentle currents generated by the unit's silent, integrated motor. Manual color selection enables one color display. Set up on a bookshelf, tabletop, or desk, the aquarium plugs into AC; automatically turns off after four hours. 13 3/4" H x 5 1/2" Diam. (1 1/2 lbs.) RD-89171 \$89.95

The Foldaway 20 MPH Transporter

This is the electric three-wheeled transporter that accelerates to a top speed of 20 mph yet folds easily for compact storage. It's powered by a 500-watt motor and features double wishbone suspension and a sturdy aluminum alloy frame that ensures smooth rides over uneven terrain. The scooter's two front 10" pneumatic tires and rear 8" pneumatic from the grip pavement while a thumb-actuated electronic brake reduces speed. Its display panel provides power, speed, and mileage readouts, and enables one to activate cruise control and operate its 24 LED headlights. With a slip-resistant deck that supports up to 220 lbs., its 48-watt rechargeable battery provides a 20-mile range from a six-hour charge via the included AC adapter. White or black. 47" L x 14" W x 20" H (47 lbs.) RD-13240 \$1,750.88

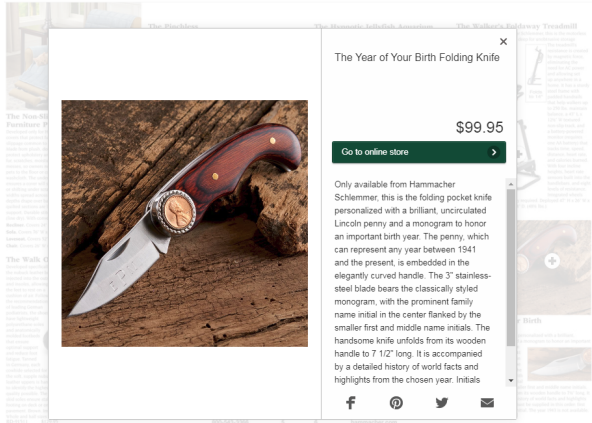
The Walker's Foldaway Treadmill

Available only from Hammacher Schlemmer, this is the motorized treadmill that folds to only 14" deep for unobtrusive storage. The treadmill's resistance is created by magnetic force, eliminating the need for AC power and allowing set up anywhere in a home. It has a sturdy steel frame with padded handrails that help walkers up to 250 lbs. maintain balance. A 47" L x 12 1/2" W motorized non-slip track, and a battery-powered monitor requires one AA battery that tracks time, speed, distance, heart rate, and calories burned. With four incline heights, heart rate sensors built into the handrails, and eight levels of resistance, integrated wheels allow easy relocation. Assembly required. Deployed 47" H x 20" W x 44" D. Folded 47" H x 20" W x 14" D. (68 lbs.) RD-83905 \$279.95

The Year Of Your Birth Folding Knife

This is the folding pocket knife personalized with a brilliant, unscratched Lincoln penny and a monogram to honor an important birth year. The penny, which can represent any year between 1943 and the present, is embedded in the elegantly curved handle. The 3" stainless-steel blade bears the classically styled monogram, with the prominent family name initial in the center flanked by the smaller first and middle name initials. The handsome knife unfolds from its wooden handle to 7 1/2" long. It is accompanied by a detailed history of world facts and highlights from the chosen year. Initials must be supplied in this order: first initial, last initial and middle initial. The year 1943 is not available. RD-13143 \$99.95.88

On mouseover, a clickable box appears



Online Catalog.

Home > Sports & Leisure > Collecting & Memorabilia

Hover and click to magnify, click again to zoom.

The Year Of Your Birth Folding Knife

This is the folding pocket knife personalized with a brilliant, uncirculated Lincoln penny and a monogram to honor an important birth year. The penny, which can represent any year between 1941 and the present, is embedded in the elegantly curved handle. The 3" stainless-steel blade bears the classically styled monogram, with the prominent family name initial in the center flanked by the smaller first and middle name initials. The handsome knife unfolds from its wooden handle to 7 1/2" long. Comes with a detailed history of world facts and highlights from the chosen year. Supply initials in this order: first initial, last initial and middle initial. The year 1943 is not available.

Description Reviews ★★★★★

Item 13143 Price \$99.95 How Many?

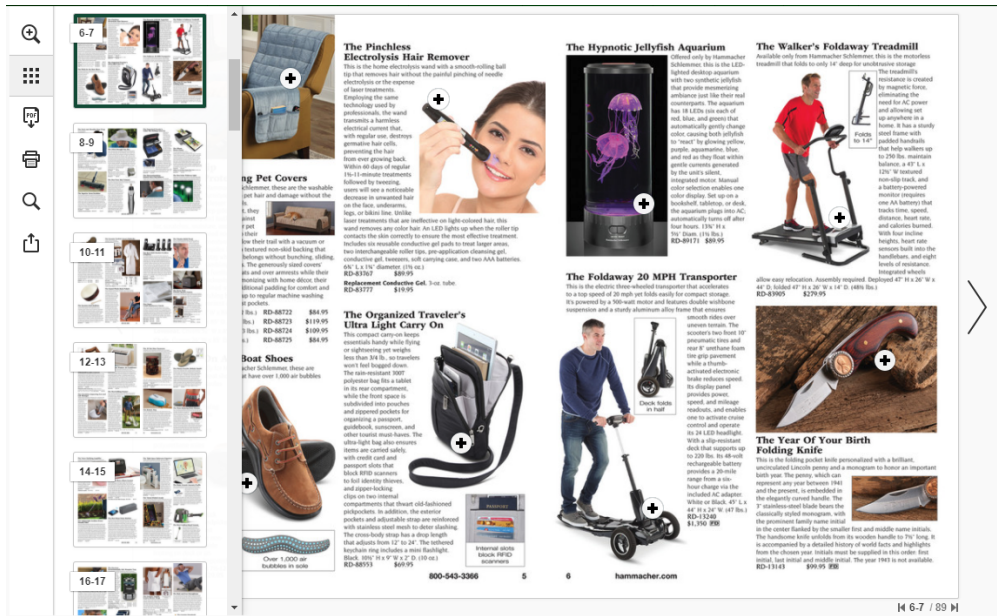
Please allow 2-3 weeks for delivery.
Not available for shipment to P.O. boxes, APO address or outside the contiguous US.

Birth Year :

Engraving (Letters will be engraved in the order you enter them. First Initial, Last Initial (Enlarged), Middle Initial) :

[Add To Shopping Bag](#)

https://www.hammacher.com/Product/Default.aspx?sku=13143&source=PUBLITAS&cm_ven=publitas. 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 Catalog.

29. 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.

30. 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: February 23, 2018

STAMOULIS & WEINBLATT LLC

/s/ Stamatios Stamoulis

Stamatios Stamoulis (admitted S.D.N.Y.)

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