

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

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| TZU Technologies, LLC, a California limited liability company, | Civil Action No. 6:19-cv-755 |
| Plaintiff, | |
| v. | |
| Advanced Inspection Technologies, Inc., a Florida Corporation, | JURY TRIAL DEMANDED |
| Defendant. | |

COMPLAINT FOR PATENT INFRINGEMENT

TZU Technologies, LLC (“Plaintiff”) brings this complaint against Advanced Inspection Technologies, Inc. (“Defendant”). As its complaint against Defendant, Plaintiff alleges as follows:

NATURE OF THE ACTION

1. This is an action under 35 U.S.C. § 271 for infringement of United States Patent No. 8,953,032 (“the ‘032 Patent”).

THE PARTIES

2. Plaintiff TZU Technologies, LLC, is a California limited liability company having a principal place of business at 35 Hugus Alley, Suite 210, Pasadena CA 91103.

3. Defendant Advanced Inspection Technologies, Inc. is a Florida corporation having a principal place of business at 2020 W EAU Gallie Blvd., Melbourne, FL 32935. Defendant may be served via its registered agent, Paul Fitzgerald at 2020 W. EAU Gallie Blvd., Melbourne, FL 32935.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because it arises under United States Patent law.

5. This Court has personal jurisdiction over the Defendant because, *inter alia*, it resides in the State of Florida; regularly conducts business in the State of Florida; and continues to commit acts of patent infringement in the State of Florida including by making, using, offering to sell, and/or selling Accused Products within the State of Florida and this district.

6. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b). Defendant is subject to this Court’s personal jurisdiction because, *inter alia*, Defendants have committed and continue to commit acts of patent infringement including making, using, offering to sell, and/or selling Accused Products in this district, and/or importing Accused Products into this district; Defendant has a principal place of business in this judicial district, and Defendant employs personnel in this judicial district.

FACTS

7. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,953,032 (“the ‘032 Patent”), entitled “Self Articulating Behind-Wall Camera,” which was duly and legally issued on February 10th, 2015 by the United States Patent and Trademark Office (“USPTO”).

8. A copy of the ‘032 Patent is attached to this Complaint as Exhibit A.

9. The claims of the ‘032 Patent are valid and enforceable.

COUNT I: CLAIM FOR PATENT INFRINGEMENT
UNDER 35 U.S.C. § 271(a) (‘032 PATENT)

10. Plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 9 of this Complaint as if fully set forth herein.

11. Defendant manufactures, imports into the United States, offers for sale, and/or sells inspection scopes, which infringe at least Claim 1 of the ‘032 Patent (hereafter “Accused

Product(s)").

12. Defendant's Accused Product(s) include, without limitation Mentor Visual HD IQ Video Borescope.

13. A claim chart comparing Claim 1 of the '032 Patent to the Accused Product(s) is attached as Exhibit B.

14. Plaintiff has been, and will continue to be, irreparably harmed by Defendant's ongoing infringement of the '032 Patent.

15. As a direct and proximate result of Defendant's infringement of the '032 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be determined.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief against Defendant as follows:

A. In favor of Plaintiff that Defendant has infringed one or more claims of the '032 Patent, either literally or under the doctrine of equivalents;

B. Requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '032 Patent as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and

C. For such other and further relief, as may be just and equitable.

DEMAND FOR TRIAL BY JURY

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands a jury trial on all issues and causes of action triable to a jury.

Dated: April 22, 2019

Respectfully submitted,

/s/Martin B. Sipple

Martin B. Sipple

Florida Bar No. 0135399

Ausley McMullen

123 S. Calhoun Street

Tallahassee, FL 32301

(850) 425-5315 – telephone

(850) 222-7560 – facsimile

msipple@ausley.com

Todd Brandt (*Pro Hac Vice* Pending)

TX State Bar 24027051

Brandt Law Firm

222 N. Fredonia Street

Longview, TX 75601

(903) 753-6760 – telephone

tbrandt@thebrandtlawfirm.com

Counsel for Plaintiff

TZU Technologies, LLC