

5. This Court has personal jurisdiction over the Defendant because, *inter alia*, it resides in the State of Texas; regularly conducts business in the State of Texas; and continues to commit acts of patent infringement in the State of Texas including by making, using, offering to sell, and/or selling Accused Products within the State of Texas 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 the TKES 10A.

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: May 10, 2019

Respectfully submitted,

/s/ Todd Brandt

Todd Brandt
TX State Bar 24027051
Brandt Law Firm
222 N. Fredonia Street
Longview, TX 75601
Tel: 903 753 6760

Counsel for Plaintiff TZU Technologies, LLC