

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

JAGER PRO INCORPORATED

PLAINTIFF

v.

Civil Action No.: 1:20cv17-GHD-DAS

**BACKWOODS SOLUTIONS, LLC and
WILDLIFE DOMINION
MANAGEMENT LLC**

DEFENDANTS

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Jager Pro Incorporated, for its Complaint against Backwoods Solutions, LLC and Wildlife Dominion Management LLC (“WDM”) (collectively “Defendants”) states:

PARTIES

1. Jager Pro Incorporated (“Jager Pro”) is a Georgia corporation with its principal place of business in Fortson, Georgia.
2. On information and belief, Defendant Backwoods Solutions, LLC (“Backwoods”) is a Mississippi corporation with a principal place of business at 1563 Penn Station Road, Crawford, Mississippi 39743.
3. On information and belief, Defendant Wildlife Dominion Management LLC (“Wildlife Dominion”) is a Mississippi corporation with a principal place of business at 1563 Penn Station Road, Crawford, Mississippi 39743.

JURISDICTION AND VENUE

4. This action includes claim for patent infringement arising under the Patent Act of the United States, 35 U.S.C. § 1 *et seq.*
5. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Backwoods because it is a Mississippi corporation with a principal place of business in this District; because it presently conducts business in this District, and has conducted business in this District at all relevant times; and because its continuing conduct in this District gives rise to the patent infringement allegations set forth herein.

7. This Court has personal jurisdiction over Wildlife Dominion because it is a Mississippi corporation with its principal place of business in this District; because it presently conducts business in this District, and has conducted business in this District at all relevant times; and because its continuing conduct in this District gives rise to the patent infringement allegations set forth herein.

8. Venue in this District is proper as to Backwoods pursuant to 28 U.S.C. § 1400(b) because Backwoods has a regular and established place of business in this District (on information and belief, at 1563 Penn Station Road, Crawford, Mississippi 39743), and has committed acts of infringement in this District. On information and belief, these acts of infringement include practicing and inducing the practice of methods that infringe the Patents-in-Suit listed herein, and making, using, offering to sell, selling, and having sold devices that directly and/or indirectly infringe the Patents-in-Suit, including without limitation the Big Pig trap and the HogEye camera.

9. Venue in this District is proper as to Wildlife Dominion pursuant to 28 U.S.C. § 1400(b) because Wildlife Dominion has a regular and established place of business in this District (on information and belief, at 1563 Penn Station Road, Crawford, Mississippi 39743), and has committed acts of infringement in this District. On information and belief, these acts of infringement include practicing and inducing the practice of methods that infringe the Patents-in-

Suit listed herein, and making, using, offering to sell, selling, and having sold devices that directly and/or indirectly infringe the Patents-in-Suit, including without limitation the Big Pig trap and the HogEye camera.

10. Joinder is proper under 35 U.S.C. § 299. The allegations of infringement contained herein are asserted against the Defendants jointly, severally, or in the alternative, and on information and belief arise, at least in part, out of the same transactions or occurrences—namely, Defendants’ collective acts of infringement in this District, which include practicing, inducing the practice of, and contributing to the practice of trapping methods that infringe the Patents-in-Suit listed herein, and making, using, offering to sell, selling, and having sold devices (including without limitation the Big Pig trap and the HogEye camera) that directly and/or indirectly infringe the Patents-in-Suit. This action will involve questions of fact common to the Defendants, including at least questions of fact concerning the infringing activities alleged herein, and the validity of the Patents-in-Suit.

**JAGER PRO’S PATENTED SOLUTION
TO THE FERAL HOG PROBLEM**

11. The Patents-in-Suit are generally related to methods of trapping animals, such as feral hogs.

12. A wild-animal infestation may be difficult to resolve. Feral hogs are recognized as a public nuisance and health hazard by various Federal and State environmental agencies.

13. Traditionally, eliminating a feral-hog problem requires trapping or shooting a group of hogs (known as a sounder) and eliminating the hogs one by one. However, this approach is very inefficient and time-consuming, and it can be dangerous to the hunter. It is also difficult to eliminate an entire sounder, as any animals that escape will learn from the failed experience, reproduce, and continue to destroy property.

14. Rod Pinkston, named inventor on the Patents-in-Suit, developed the M.I.N.E. Trapping System based on his experience while serving on active duty in the United States Army. Mr. Pinkston founded Jager Pro to bring his feral-hog-control solution to the public.

15. Before founding Jager Pro, Mr. Pinkston served in the United States Army for 24 years. Part of his military service included two tours in Germany, attending the U.S. Forces European Hunting School, and studying European boar behavior with German jägermeisters and forstmeisters.

16. Relying on his Army experience, military training, and innovative ideas around wild-pig captures, Mr. Pinkston developed efficient methods of whole-sounder removal. Emphasis is placed on efficient removal of the entire sounder at one time to eliminate escapes, reproduction, and education while reducing the time and labor required to perform the task.

17. Mr. Pinkston founded Jager Pro with a team of other U.S. military veterans. Jager Pro employs ten retired soldiers who have, collectively, more than 220 years of military training and experience. Jager Pro is the first company to use military-grade technology and methods to address the feral-hog problem in the United States, and the results speak for themselves. Jager Pro's M.I.N.E. Trapping System has been used to harvest over 32,000 feral swine in Georgia alone.

18. Jager Pro was founded to bring the M.I.N.E. Trapping System to the public to help alleviate the public health and private property-damage issues associated with wild animals, especially feral hogs. Jager Pro has demonstrated the effectiveness of the M.I.N.E Trapping System at numerous conferences and through successful use in the field. Mr. Pinkston has been a national speaker at every Wildlife Damage Management Conference and every International

Wild Pig Conference since 2007. The effectiveness and operation of the system have garnered tremendous industry praise.

19. For example, the M.I.N.E. Trapping System is currently being operated by state or federal government agencies in 22 states, and it has earned praise from Certified Wildlife Biologists for its increased efficiency, reliability, and ease of capturing an entire sounder at one time while saving time and labor expenses over previous trip-wire-activated trapping methods.

20. The M.I.N.E. Trapping System was praised for its high capture percentage, which prevents “method education.” Method education refers to the number of hogs that learn how to evade or escape capture and then spread their trap-avoidance knowledge to the remaining hog population, creating future trap avoidance or resistance to the removal method.

21. Before Jager Pro’s development of the M.I.N.E. Trapping System, traps generally were smaller, trip-wire-activated, fully enclosed traps that had narrow openings, metallic trap bottoms, and overhead covers. The M.I.N.E. Trapping System eschewed these features, which feral hogs distrust and cause them to avoid traps, resulting in low capture percentage and high method education.

JAGER PRO’S PATENTS

22. United States Patent Number 9,814,228 (“The ’228 Patent”) is titled “Systems and Methods for Animal Trapping.” The ’228 Patent was filed March 16, 2016. The ’228 Patent was duly and legally issued by the United States Patent and Trademark Office on November 14, 2017. Jager Pro is the owner of the ’228 Patent with all substantive rights. A true and correct copy of the ’228 Patent is attached as Exhibit A.

23. United States Patent Number 10,098,339 (“The ’339 Patent”) is titled “System and Methods for Animal Trapping.” The ’339 Patent was filed October 25, 2017. The ’339 Patent was duly and legally issued by the United States Patent and Trademark Office on October

16, 2018. Jager Pro is the owner of the '339 Patent with all substantive rights. A true and correct copy of the '339 Patent is attached as Exhibit B.

DEFENDANTS' BIG PIG TRAP AND HOGEYE CAMERA

24. Defendants' Big Pig trap and HogEye camera, and the use thereof, infringes both of the Patents-in-Suit.

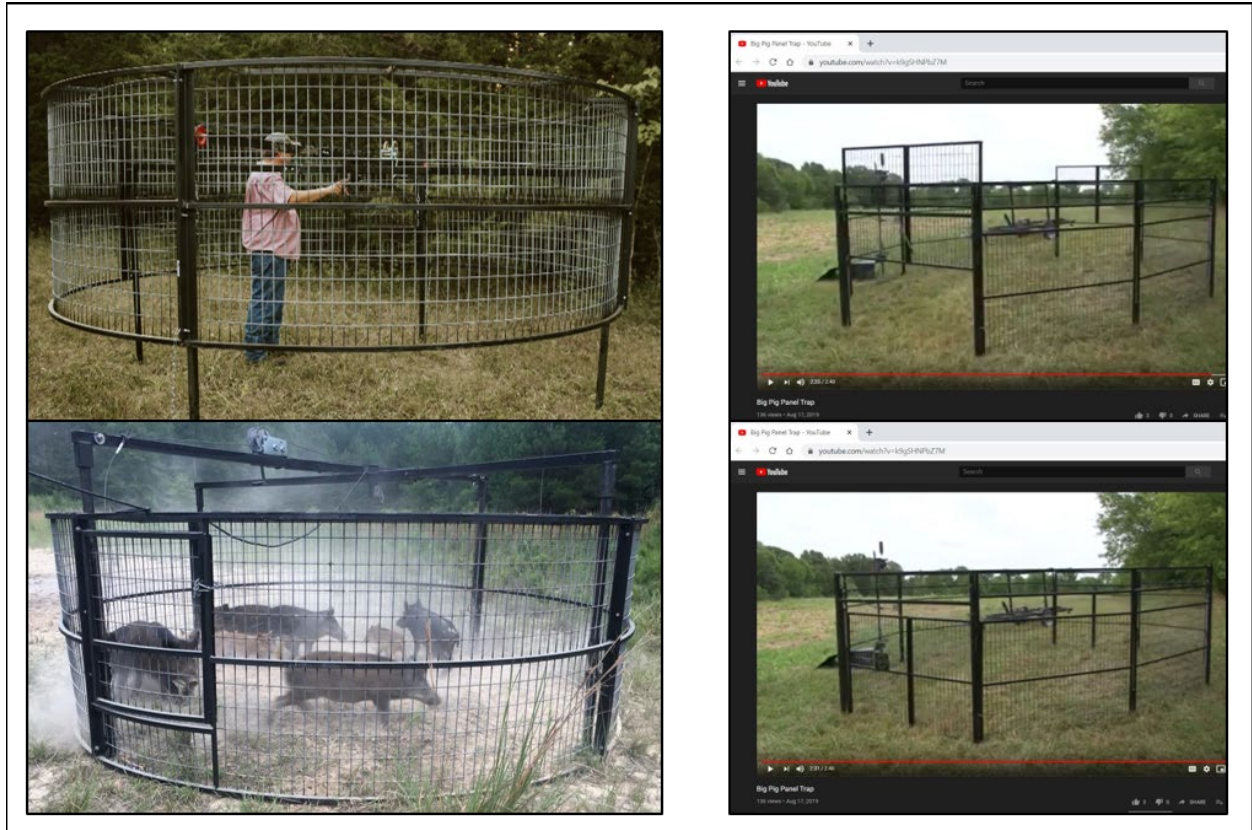


FIG. 1

25. FIG. 1 shows images of a Big Pig trap available at www.bigpigtrap.com (left), and screen captures from a Big Pig product video available at <https://www.youtube.com/watch?v=k9gSHNPbZ7M> (right). As can be seen from these images, the Big Pig trap utilizes an enclosure with at least one portion that can move from an open position that permits passage of a plurality of feral pigs into the enclosure (FIG. 1, top images), to a closed position that restricts passage of the plurality of feral pigs out of the enclosure by cooperating with a ground surface to

define an enclosure area in which the feral pigs are trapped, with said ground surface extending continuously from within the enclosure area to areas surrounding the enclosure (FIG. 1, bottom images).

26. The Big Pig trap utilizes a release mechanism that effects movement of the at least one portion of the enclosure from the open position to the closed position upon receipt of a signal from a control mechanism. *See* FIG. 2; (screen captures from “Big Pig Trap Setup” and “HogEye Camera Setup” videos available at www.bigpigtrap.com).



FIG. 2

27. The Big Pig trap and/or Hog Eye camera utilizes a camera assembly that is in communication with the control mechanism, as shown in FIG. 3 below (screen captures from “HogEye Camera Setup” video available at www.bigpigtrap.com). The “HogEye Camera Setup” demonstration video explains that a connection is run “from the camera, over the top of the trap, and plug[ged] into the trigger mechanism.” *See* FIG. 3.

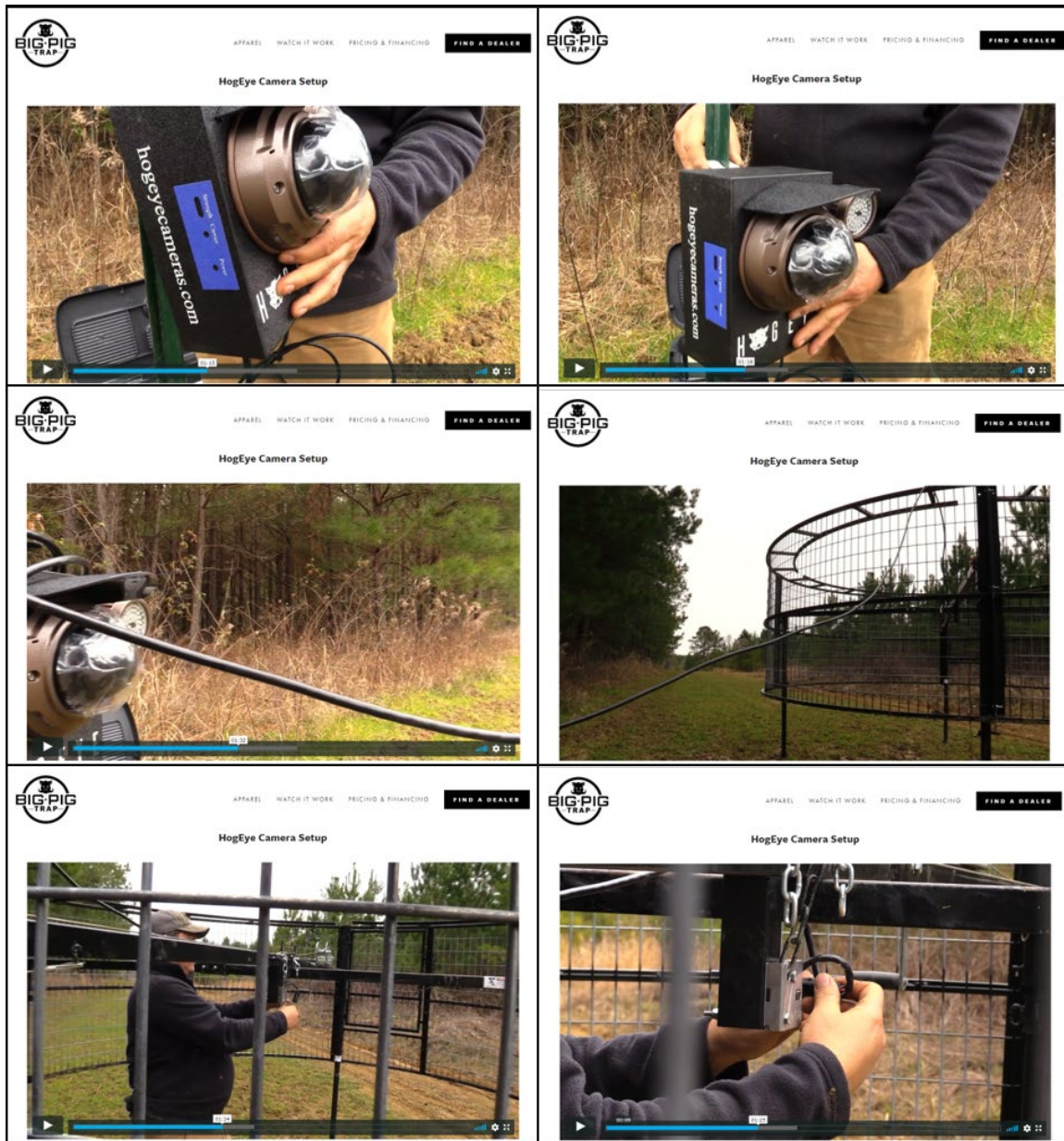


FIG. 3.

28. The Big Pig trap utilizes a display device that is in communication with the control mechanism and the camera assembly, can receive a signal from the camera assembly upon detection of feral pigs within the enclosure, and can transmit a wireless signal to the control mechanism, instructing the control mechanism to transmit a release signal instructing the release mechanism to effect movement of the at least one portion of the enclosure from the open position

to the closed position. *See* FIG. 4 (screen capture from www.bigpigtrap.com). The product description available at www.bigpigtrap.com states that the Big Pig trap is “an effective, affordable trap that also comes with a high-quality trap camera for live video monitoring.” The product description available at www.bigpigtrap.com further states that

With our mobile app that works with our high-quality trap camera, you’ll get notified when Feral Pigs enter your trap. Sit back, watch the live video through the mobile app, and when your trap is full of Feral Pigs, simply touch the button on the app to drop your trap gate.

See FIG. 4.

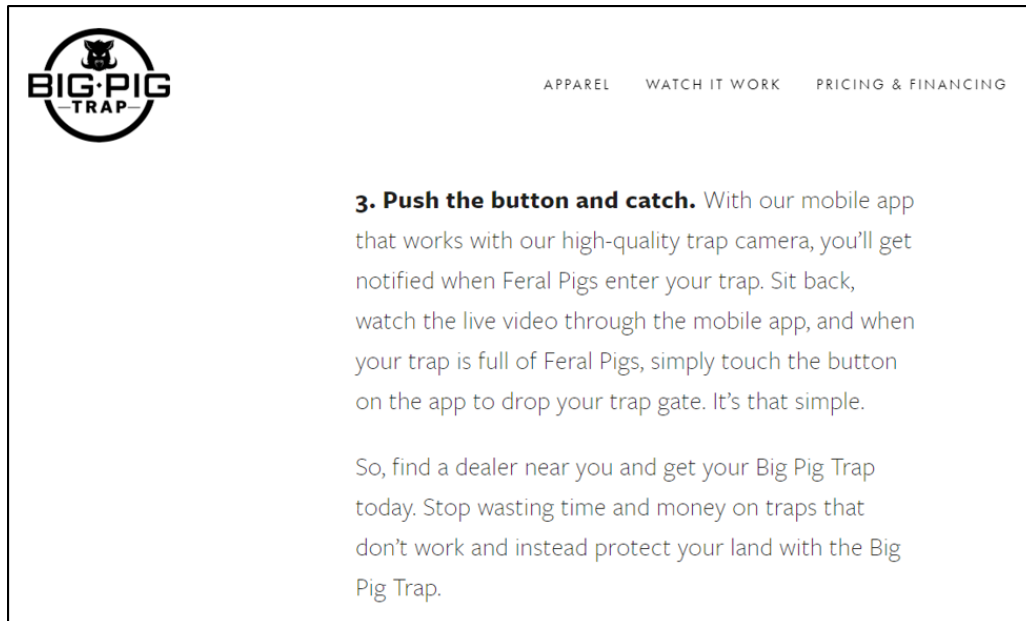


FIG. 4

29. The HogEye camera utilizes a display device that is in communication with the control mechanism and the camera assembly, can receive a signal from the camera assembly upon detection of feral pigs within the enclosure, and can transmit a wireless signal to the control mechanism, instructing the control mechanism to transmit a release signal instructing the release mechanism to effect movement of the at least one portion of the enclosure from the open position to the closed position. The product description available at www.hogeyecameras.com states that

the HogEye camera is a “Live-Video Camera System” that “Works on Any Trap,” and allows users to “Drop Your Trap Gate 24/7 From Anywhere.” The HogEye camera website further

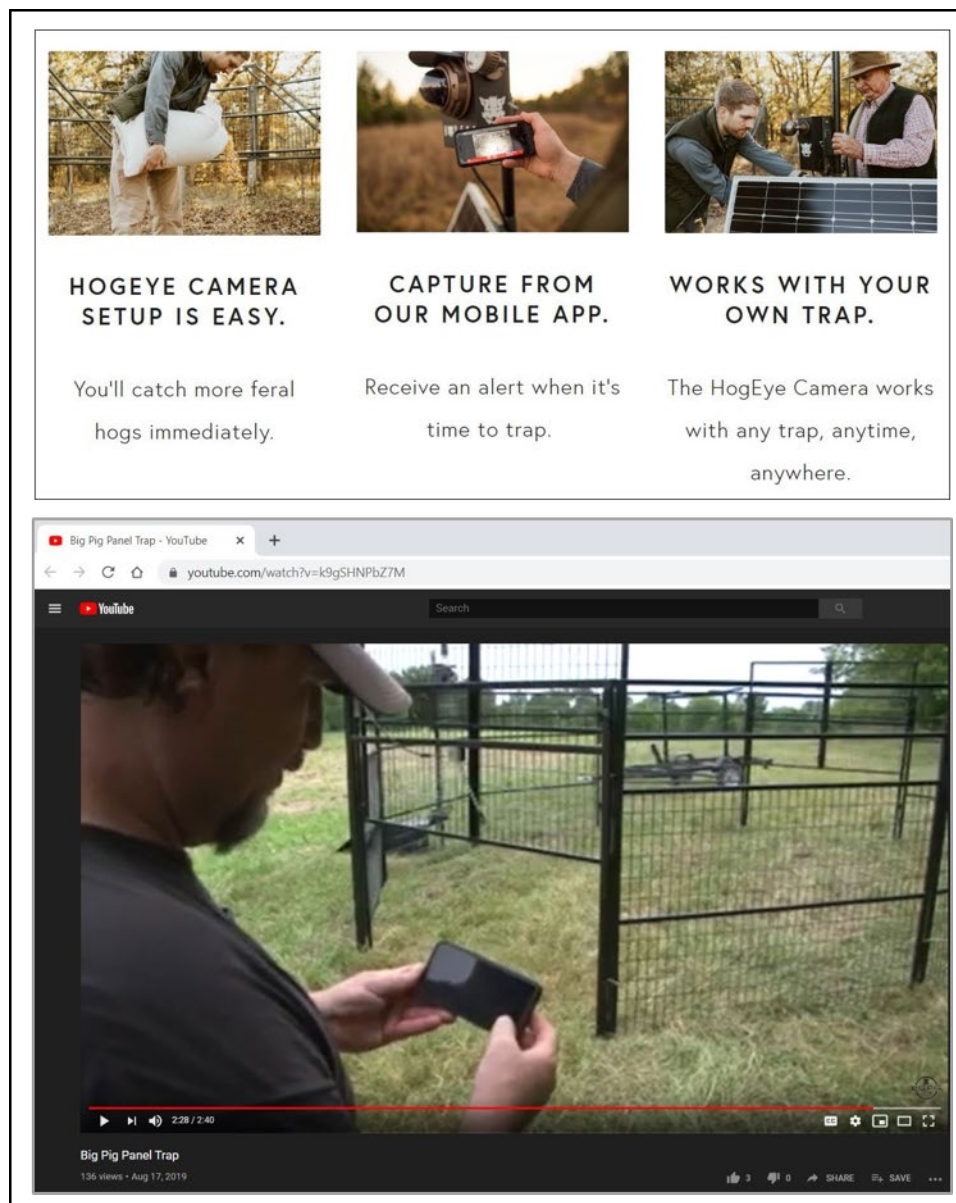


FIG. 5

states that users will “[r]eceive an alert when it’s time to trap,” and that “[t]he HogEye Camera works with any trap, anytime, anywhere.” See FIG. 5, top (image from www.hogeyecameras.com). In a Big Pig trap product video available at <https://www.youtube.com/watch?v=k9gSHNPbZ7M>, the narrator explains that “[w]ith the split system provided by the HogEye

Camera, you can drop each gate simultaneously, by a single push of a button on your phone.”
See FIG. 5, bottom (screen capture from Big Pig trap product video). The website for the HogEye Camera (www.hogeyecameras.com) further includes a background video that shows a variety of traps being used to capture feral pigs, and implies that the HogEye camera was used to trigger the release of the enclosures used by those traps.

**DEFENDANTS’ WILLFUL INFRINGEMENT
OF THE PATENTS-IN-SUIT**

30. The manufacture, use, offer for sale, and sale of the Big Pig trap by Defendants and/or their customers satisfies each element of at least one claim of the ’228 and ’339 Patents.

31. On April 2, 2018, Jager Pro provided written notice to Defendant Wildlife Dominion Management LLC, informing them that they were infringing the ’228 Patent.

32. On August 21, 2019, Jager Pro provided written notice to Defendant Backwoods Solutions, LLC, informing them that they were infringing the ’228 and ’339 Patents.

33. As such, Defendants have been on notice regarding their infringement of the ’228 Patent since at least on or around April 2, 2018, and have been on notice regarding their infringement of the ’339 Patent since at least on or around August 21, 2019, and their infringement has been willful since at least those dates.

FIRST CLAIM FOR RELIEF
Direct Infringement of United States Patent No. 9,814,228
Big Pig Trap

34. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

35. Defendants have directly infringed and are still directly infringing the ’228 Patent by making, using, selling, and offering to sell the Big Pig trap in this District and elsewhere in the United States.

36. For example, with respect to claim 1 of the '228 Patent, Defendants utilize the Big Pig trap to capture feral pigs in a manner that infringes that claim for at least the reasons set forth *supra* in Paragraphs 22–33.

37. On information and belief, Defendants have known of the '228 Patent since at least on or around April 2, 2018, when Jager Pro provided written notice of infringement to Defendant Wildlife Dominion Management LLC, along with a copy of the '228 Patent. Since that time, Defendants have knowingly continued their directly infringing activities.

38. On information and belief, Defendants will continue to directly infringe the '228 Patent unless and until it is enjoined by the Court.

39. Defendants' direct infringement of the '228 Patent has caused Jager Pro to suffer damages that include lost profits.

SECOND CLAIM FOR RELIEF
Induced Infringement of United States Patent No. 9,814,228
Big Pig Trap

40. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

41. On information and belief, Defendants have actively induced infringement of the '228 Patent by selling, leasing, or otherwise providing the Big Pig trap to customers, and by providing training and/or instruction concerning its use, with knowledge of the Patents-in-Suit, and the specific intent of encouraging, aiding, or causing others to directly infringe the '228 Patent, and/or willful blindness to the same.

42. For example, with respect to claim 1 of the '228 Patent, Defendants instruct customers to utilize the Big Pig trap in a manner that infringes that claim for at least the reasons set forth *supra* in Paragraphs 22–33.

43. On information and belief, Defendants have known of the '228 Patent since at least on or around April 2, 2018, when Jager Pro provided written notice of infringement to Defendant Wildlife Dominion Management LLC, along with a copy of the '228 Patent. Since that time, Defendants have knowingly continued to actively induce infringement of the '228 Patent by selling, leasing, or otherwise providing the Big Pig trap to customers, and by providing training and/or instruction concerning its use. Defendants' induced infringement is therefore willful.

44. On information and belief, Defendants will continue to induce infringement of the '228 Patent unless and until they are enjoined by the Court.

45. Defendants' induced infringement of the '228 Patent has caused Jager Pro to suffer damages that include lost profits.

THIRD CLAIM FOR RELIEF
Contributory Infringement of United States Patent No. 9,814,228
Big Pig Trap

46. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

47. On information and belief, Defendants have contributed to the infringement of others by selling, leasing, or otherwise providing to others the Big Pig trap, which is a device especially made for or adapted for use in performing the methods of the '228 Patent, the use of which is a material part of the claimed invention, and which is not a staple article suitable for substantial non-infringing use. Defendants' customers then use the Big Pig trap in a manner that infringes at least claim 1 of the '228 Patent for at least the reasons set forth *supra* in Paragraphs 22–33.

48. On information and belief, Defendants have known of the '228 Patent since at least on or around April 2, 2018, when Jager Pro provided written notice of infringement to

Defendant Wildlife Dominion Management LLC, along with a copy of the '228 Patent. Since that time, Defendants have knowingly continued to actively contribute to the infringement of the '228 Patent by others, by selling, leasing, or otherwise providing the Big Pig trap to customers, and by providing training and/or instruction concerning its use. Defendants' contributory infringement is therefore willful.

49. On information and belief, Defendants will continue to contribute to the infringement of the '228 Patent unless and until they are enjoined by the Court.

50. Defendants' contributory infringement of the '228 Patent has caused Jager Pro to suffer damages that include lost profits.

FOURTH CLAIM FOR RELIEF
Direct Infringement of United States Patent No. 10,098,339
Big Pig Trap

51. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

52. Defendants have directly infringed and are still directly infringing the '339 Patent by making, using, selling, and offering to sell the Big Pig trap in this District and elsewhere in the United States.

53. For example, with respect to claim 1 of the '339 Patent, Defendants makes, uses, offers to sell, and sells a trap—the Big Pig trap—that is designed to capture feral pigs in a manner that infringes that claim for at least the reasons set forth *supra* in Paragraphs 22–33.

54. On information and belief, Defendants have known of the '339 Patent since at least on or around August 21, 2019, when Jager Pro provided written notice of infringement to Defendant Backwoods Solutions, LLC, along with a copy of the '339 Patent. Since that time, Defendants have knowingly continued their infringing activities.

55. On information and belief, Defendants will continue to infringe the '339 Patent unless and until they are enjoined by the Court.

56. Defendants' infringement of the '339 Patent has caused Jager Pro to suffer damages that include lost profits.

FIFTH CLAIM FOR RELIEF
Induced Infringement of United States Patent No. 10,098,339
Big Pig Trap

57. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

58. On information and belief, Defendants have actively induced infringement of the '339 Patent by selling, leasing, or otherwise providing the Big Pig trap to customers, and by providing training and/or instruction concerning its use, with knowledge of the Patents-in-Suit, and the specific intent of encouraging, aiding, or causing others to directly infringe the '339 Patent, and/or willful blindness to the same.

59. For example, with respect to claim 1 of the '339 Patent, Defendants instruct customers to utilize the Big Pig trap in a manner that infringes for at least the reasons set forth *supra* in Paragraphs 22–33.

60. On information and belief, Defendants have known of the '339 Patent since at least on or around August 21, 2019, when Jager Pro provided written notice of infringement to Defendant Backwoods Solutions, LLC, along with a copy of the '339 Patent. Since that time, Defendants have knowingly continued to actively induce infringement of the '339 Patent by selling, leasing, or otherwise providing the Big Pig trap to customers, and by providing training and/or instruction concerning its use. Defendants' induced infringement is therefore willful.

61. On information and belief, Defendants will continue to induce infringement of the '339 Patent unless and until they are enjoined by the Court.

62. Defendants' induced infringement of the '339 Patent has caused Jager Pro to suffer damages that include lost profits.

SIXTH CLAIM FOR RELIEF
Contributory Infringement of United States Patent No. 10,098,339
Big Pig Trap

63. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

64. On information and belief, Defendants have contributed to the infringement of others by selling, leasing, or otherwise providing to others the Big Pig trap, which is a device especially made for or adapted for trapping feral hogs as claimed by the '339 Patent, the use of which is a material part of the claimed invention, and which is not a staple article suitable for substantial non-infringing use. Defendants' customers then use the Big Pig trap in a manner that infringes at least claim 1 of the '339 Patent for at least the reasons set forth *supra* in Paragraphs 22–33.

65. On information and belief, Defendants have known of the '339 Patent since at least on or around August 21, 2019, when Jager Pro provided written notice of infringement to Defendant Backwoods Solutions, LLC, along with a copy of the '339 Patent. Since that time, Defendants have knowingly continued to actively contribute to the infringement of the '339 Patent by others, by selling, leasing, or otherwise providing the Big Pig trap to customers, and by providing training and/or instruction concerning its use. Defendants' contributory infringement is therefore willful.

66. On information and belief, Defendants will continue to contribute to the infringement of the '339 Patent unless and until they are enjoined by the Court.

67. Defendants' contributory infringement of the '339 Patent has caused Jager Pro to suffer damages that include lost profits.

SEVENTH CLAIM FOR RELIEF
Induced Infringement of United States Patent No. 9,814,228
HogEye Camera

68. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

69. On information and belief, Defendants have actively induced infringement of the '228 Patent by selling, leasing, or otherwise providing the HogEye camera to customers, and by providing training and/or instruction concerning its use, with knowledge of the Patents-in-Suit, and the specific intent of encouraging, aiding, or causing others to directly infringe the '228 Patent, and/or willful blindness to the same.

70. For example, with respect to claim 1 of the '228 Patent, Defendants instruct customers to utilize the HogEye camera in a manner that infringes that claim for at least the reasons set forth *supra* in Paragraphs 22–33.

71. On information and belief, Defendants have known of the '228 Patent since at least on or around April 2, 2018, when Jager Pro provided written notice of infringement to Defendant Wildlife Dominion Management LLC, along with a copy of the '228 Patent. Since that time, Defendants have knowingly continued to actively induce infringement of the '228 Patent by selling, leasing, or otherwise providing the HogEye camera to customers, and by providing training and/or instruction concerning its use. Defendants' induced infringement is therefore willful.

72. On information and belief, Defendants will continue to induce infringement of the '228 Patent unless and until they are enjoined by the Court.

73. Defendants' induced infringement of the '228 Patent has caused Jager Pro to suffer damages that include lost profits.

EIGHTH CLAIM FOR RELIEF

***Contributory Infringement of United States Patent No. 9,814,228
HogEye Camera***

74. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

75. On information and belief, Defendants have contributed to the infringement of others by selling, leasing, or otherwise providing to others the HogEye camera, which is a device especially made for or adapted for use in performing the methods of the '228 Patent, the use of which is a material part of the claimed invention, and which is not a staple article suitable for substantial non-infringing use. Defendants' customers then use the HogEye camera in a manner that infringes at least claim 1 of the '228 Patent for at least the reasons set forth *supra* in Paragraphs 22–33.

76. On information and belief, Defendants have known of the '228 Patent since at least on or around April 2, 2018, when Jager Pro provided written notice of infringement to Defendant Wildlife Dominion Management LLC, along with a copy of the '228 Patent. Since that time, Defendants have knowingly continued to actively contribute to the infringement of the '228 Patent by others, by selling, leasing, or otherwise providing the HogEye camera to customers, and by providing training and/or instruction concerning its use. Defendants' contributory infringement is therefore willful.

77. On information and belief, Defendants will continue to contribute to the infringement of the '228 Patent unless and until they are enjoined by the Court.

78. Defendants' contributory infringement of the '228 Patent has caused Jager Pro to suffer damages that include lost profits.

NINTH CLAIM FOR RELIEF
Induced Infringement of United States Patent No. 10,098,339
HogEye Camera

79. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

80. On information and belief, Defendants have actively induced infringement of the '339 Patent by selling, leasing, or otherwise providing the HogEye camera to customers, and by providing training and/or instruction concerning its use, with knowledge of the Patents-in-Suit, and the specific intent of encouraging, aiding, or causing others to directly infringe the '339 Patent, and/or willful blindness to the same.

81. For example, with respect to claim 1 of the '339 Patent, Defendants instruct customers to utilize the HogEye camera in a manner that infringes for at least the reasons set forth *supra* in Paragraphs 22–33.

82. On information and belief, Defendants have known of the '339 Patent since at least on or around August 21, 2019, when Jager Pro provided written notice of infringement to Defendant Backwoods Solutions, LLC, along with a copy of the '339 Patent. Since that time, Defendants have knowingly continued to actively induce infringement of the '339 Patent by selling, leasing, or otherwise providing the HogEye camera to customers, and by providing training and/or instruction concerning its use. Defendants' induced infringement is therefore willful.

83. On information and belief, Defendants will continue to induce infringement of the '339 Patent unless and until they are enjoined by the Court.

84. Defendants' induced infringement of the '339 Patent has caused Jager Pro to suffer damages that include lost profits.

TENTH CLAIM FOR RELIEF

***Contributory Infringement of United States Patent No. 10,098,339
HogEye Camera***

85. Jager Pro repeats the allegations set forth in the paragraphs above as if fully set forth herein.

86. On information and belief, Defendants have contributed to the infringement of others by selling, leasing, or otherwise providing to others the HogEye camera, which is a device especially made for or adapted for trapping feral hogs as claimed by the '339 Patent, the use of which is a material part of the claimed invention, and which is not a staple article suitable for substantial non-infringing use. Defendants' customers then use the HogEye camera in a manner that infringes at least claim 1 of the '339 Patent for at least the reasons set forth *supra* in Paragraphs 22–33.

87. On information and belief, Defendants have known of the '339 Patent since at least on or around August 21, 2019, when Jager Pro provided written notice of infringement to Defendant Backwoods Solutions, LLC, along with a copy of the '339 Patent. Since that time, Defendants have knowingly continued to actively contribute to the infringement of the '339 Patent by others, by selling, leasing, or otherwise providing the HogEye camera to customers, and by providing training and/or instruction concerning its use. Defendants' contributory infringement is therefore willful.

88. On information and belief, Defendants will continue to contribute to the infringement of the '339 Patent unless and until they are enjoined by the Court.

89. Defendants' contributory infringement of the '339 Patent has caused Jager Pro to suffer damages that include lost profits.

PRAYER FOR RELIEF

WHEREFORE, Jager Pro prays for the following relief:

- i. Entry of judgment that Defendants have directly infringed the Patents-in-Suit;
- ii. Entry of judgment that Defendants have induced infringement of the Patents-in-Suit;
- iii. Entry of judgment that Defendants have contributed to the infringement of the Patents-in-Suit;
- iv. Entry of judgment that Defendants' infringement of the Patents-in-Suit was willful, and that Jager Pro is entitled to treble damages under 35 U.S.C. § 284;
- v. Entry of an order awarding Jager Pro damages adequate to compensate for Defendants' infringing activities, including supplemental damages for any post-verdict infringement up until entry of the final judgment, with an accounting as needed, together with prejudgment and post-judgment interest on the damages awarded; all of these damages to be enhanced in an amount up to treble the amount of compensatory damages as justified under 35 U.S.C. § 284;
- vi. Entry of an order permanently enjoining Defendants and their officers, agents, directors, employees, parents, subsidiaries, affiliates, divisions, successors, assigns, and all persons in privity or active concert or participation with them, from infringing the Patents-in-Suit;
- vii. Entry of an order directing that Defendants destroy or deliver to Jager Pro all documents, materials, and things, including but not limited to products, advertising and promotional materials, sales and marketing plans, and the like, which infringe the Patents-in-Suit, or otherwise violate Plaintiffs' rights in the Patents-in-Suit.

- viii. Entry of an order declaring that this case is exceptional under 35 U.S.C. § 285, and awarding Jager Pro its reasonable costs and expenses of litigation, including attorneys' and experts' fees; and
- ix. Entry of an order awarding Jager Pro such other relief as the Court may deem just and proper.

JURY DEMAND

Jager Pro respectfully demands a trial by jury as to all claims and all issues properly triable thereby.

Respectfully submitted,

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