

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COZY, INC.)	
)	
Plaintiff,)	
)	C.A. No. 21-cv-10134
v.)	
)	JURY TRIAL DEMANDED
DOREL JUVENILE GROUP, INC.)	
)	
)	
Defendant.)	
_____)	

COMPLAINT FOR PATENT INFRINGEMENT

1. On June 29, 2009, Defendant Dorel Juvenile Group, Inc. (“Dorel Juvenile”) announced its “Air Protect®” line of child car seats. “Dorel Juvenile Group Introduces Ground-Breaking Car Seat Safety Technology,” attached as Ex. A. Dorel Juvenile’s press release stated Air Protect to be “revolutionary” and “the most innovative and groundbreaking safety feature ever offered in a car seat.” There was one big problem with the announcement: Dorel Juvenile didn’t invent Air Protect® child car seats. Instead, it knowingly copied the technology from Plaintiff Cozy, Inc. (“Cozy”), who had invented it years before.

2. Cozy, a small company, invested substantial time and money in developing innovative technology for child car seats and other vehicle safety systems beginning in 1997. This innovative work of its founder and President, Dr. Arjuna Rajasingham, resulted in over fifty United States patents.

3. Dr. Rajasingham is a pioneering inventor who started patenting car seat technology in 1997. When Dr. Rajasingham entered the child car seat industry, safety innovation was nearly at a standstill. Child seats were and are required by law, resulting in a stable market for the incumbents. Government regulations required a test that needed to be passed and any seat that

passed this test was marketable. As a result, there was little to no incentive to innovate with regard to safety. Incumbents in the industry competed largely on low cost utility factors and cosmetics of the seats which required little to no innovation, creativity or research.

4. Dr. Rajasingham was determined to break that mold with his innovations to provide technologies that improve safety of seats, recognizing that road accidents were the biggest killer of children in the United States. He first disclosed his innovative foam-filled airbag technology in a patent application filed in 1999. Thereafter, relying upon his inventions, he explored forming his own car seat business with the goal of manufacturing car seats in the USA that would be safer than those with available technologies, and that would exceed the safety performance of their European counterparts.

5. In September 2006, Cozy hired the director of computational engineering at the Children's Hospital of Philadelphia, Dr. Rajiv Menon, to work part-time until sufficient funds could be raised to hire him full-time. Dr. Menon signed an NDA and as part of his work, Cozy provided Dr. Menon with access to highly confidential design and technical information, including Cozy's plans to implement its innovative foam-filled airbag technology in child seats.

6. In June 2008, right about the time that Cozy had raised the necessary money to hire Dr. Menon full-time, Dr. Menon abruptly stopped working for Cozy. He then began to work for Dorel Juvenile as Engineering Director. Shortly thereafter, Dorel Juvenile filed its first provisional patent application covering a foam-filled airbag for use in car seats. *See* U.S. Provisional Appl. No. 61/084,889 filed July 30, 2008.

7. In March 2009, Dorel Juvenile and Cozy entered an NDA to facilitate collaboration between the parties on car seat technology. In May 2009, believing that Dorel Juvenile's motivations remained pure, Dr. Rajasingham met with Dorel Juvenile technical staff and provided

to Dorel Juvenile highly confidential design and technical information developed by Cozy. Yet in June 2009, Cozy learned that Dorel Juvenile copied Cozy's technology when Dorel Juvenile issued the press release announcing its Air Protect® car seats. *See* Ex. A.

8. Starting in July 2009, Cozy notified Dorel Juvenile that it held patents on car seat technologies, including those covering Dorel Juvenile's Air Protect® seats. As Cozy achieved additional patents on Dr. Rajasingham's inventions, including regarding Cozy's more recent patents, it continued to notify Dorel Juvenile of its infringement due to Dorel Juvenile's manufacture and sale of the Air Protect® seats. Even as recently as May 2015, Cozy continued to attempt to forge a partnership with Dorel Juvenile, laying out specifically how Dorel Juvenile's Air Protect® seats infringed claims of Cozy's patents. Dorel Juvenile refused to negotiate the matter in good faith. Even despite being confronted with Cozy's patents, Dorel Juvenile continued to call its Air Protect® technology "the most innovative safety feature ever offered in a car seat."¹

9. After years of Dorel Juvenile's refusal to work with Cozy, and its willful infringement of Cozy's patents, Cozy has no choice but to file the instant lawsuit for patent infringement.

NATURE OF THE ACTION

10. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.*, for infringement of United States Patent Nos. 9,902,298; 9,669,739; 8,136,835; and 7,156,416.

¹ *See* <https://safety1st.zendesk.com/hc/en-us/articles/206681903-Air-Protect-Car-Seat-Revolutionary-Side-Impact-Technology>, dated June 9, 2016.

PARTIES

11. Plaintiff Cozy is a corporation duly organized and existing under the laws of Delaware, having a registered office at 16192 Costal Highway, Lewes, DE 19958, and a principal place of business at 6024 Bradley Blvd., Bethesda, MD 20817. Cozy was formed to design and develop baby and child products, specifically child car seats.

12. Defendant Dorel Juvenile is a corporation organized and existing under the laws of Massachusetts, having a principal place of business at 25 Forbes Blvd., Suite 4, Foxboro, MA, 02035, and a registered agent at 84 State Street, Boston, MA 02109. *See* DJGI Mass entity summary, attached as Ex. B.

13. Dorel Juvenile is in the business of, *inter alia*, making and selling consumer products and household goods, including recreational and leisure products, home furnishings and baby and child products, including specifically child car seats.² Dorel Juvenile sells child car seats, including Air Protect® seats, under the brand names Safety 1st, Maxi-Cosi, Cosco, and others.³

JURISDICTION AND VENUE

14. This action arises under the patent laws of the United States, Title 35, United States Code, including 35 U.S.C. § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

15. The Court has personal jurisdiction over Dorel Juvenile because Dorel Juvenile maintains its principal place of business in this District at 25 Forbes Blvd., Suite 4, Foxboro, MA, 02035, and from that location conducts and/or directs the acts of accused infringement in this action. *See* Ex. B. Specifically, the Dorel Juvenile USA Design and Development Center is

² *See* <https://na.doreljuvenile.com/about-us/about-us>.

³ *Id.*

located in Foxboro, Massachusetts. Dorel Juvenile conducts research, design, development, testing, and marketing of its products at the Foxboro Design and Development Center.⁴ Dorel Juvenile researched, designed, developed, tested, and marketed its Air Protect® seats at the Foxboro Design and Development Center.⁵

16. Dorel Juvenile has over 100 employees in the Boston area, including Dorel Juvenile's President and CEO Paul J. Powers Jr., Chief Product Development and Research Officer Vikas Malhotra, and Creative Director Lynn Dowling, as well as various other design, engineer, and sales and marketing employees.⁶

17. Dorel Juvenile conducts business in this District by making, shipping, distributing, offering for sale, selling, and advertising (including through its interactive web page) its products, including Air Protect® seats, in this District and across the State of Massachusetts.⁷ Dorel Juvenile's infringing activities include selling infringing Air Protect® seats in retail stores within this District, including Target.

18. Venue is proper in this judicial District pursuant to 28 U.S.C. §§ 1391 and 1400(b), because Dorel Juvenile regularly conducts business within this District, has a regular and established place of business in this District, and has committed acts of infringement within this District.

⁴ See <https://na.doreljuvenile.com/about-us/our-locations/foxboro>.

⁵ See *id.*

⁶ See <https://www.linkedin.com/company/dorel-juvenile/people/?facetGeoRegion=us%3A7>.

⁷ See, e.g., <https://na.doreljuvenile.com/our-brands>; <https://na.doreljuvenile.com/news-stories/safety-1st-uses-live-video-to-promote-air-protect-tour> <https://na.doreljuvenile.com/news-stories/maxi-cosi-air-technology%E2%84%A2-wins-prestigious-award-at-kind-%2B-jugend-in-cologne>.

THE PATENTS-IN-SUIT

19. United States Patent No. 9,902,298 (“the ’298 patent”) titled “Vehicle Occupant Support,” was duly and legally issued on February 27, 2018. A true and correct copy of the ’298 patent is attached as Exhibit C.

20. United States Patent No. 9,669,739 (“the ’739 patent”) titled “Vehicle Occupant Support,” was duly and legally issued on June 6, 2017. A true and correct copy of the ’739 patent is attached as Exhibit D.

21. United States Patent No. 8,136,835 (“the ’835 patent”) titled “Easy Ejector Seat with Skeletal Crash Safety Beam,” was duly and legally issued on March 20, 2012. A true and correct copy of the ’835 patent is attached as Exhibit E.

22. United States Patent No. 7,156,416 (“the ’416 patent”) titled “Easy Ejector Seat with Skeletal Crash Safety Beam,” was duly and legally issued on January 2, 2007. A true and correct copy of the ’416 patent is attached as Exhibit F.

23. Dr. Rajasingham is the sole inventor of the ’298, ’739, ’835, and ’416 patents (collectively, “the Patents-in-Suit”).

24. Cozy is the assignee and owner of the Patents-in-Suit.

25. The Patents-in-Suit are valid and enforceable.

DOREL JUVENILE’S UNAUTHORIZED USE OF COZY’S PATENTED TECHNOLOGY

26. The accused products in this case include, but are not limited to, Dorel Juvenile’s child seats that incorporate Dorel Juvenile’s Air Protect® technology (collectively, the “Accused Products”).

27. In June 2009, Dorel Juvenile issued a press release announcing its “Air Protect®” car seats incorporating Cozy’s patented technology. *See* Ex. A. By October 2010, Dorel Juvenile

had “rolled out the Air Protect® Technology in a variety of car seats – covering all child weight and height requirements for child restraint systems.” *See* “Dorel Juvenile Group Offers Groundbreaking Side Impact Technology to Children of All Ages” press release dated Oct. 11, 2010, attached as Ex. G. Once again, Dorel Juvenile characterized its line of Safety 1st car seats with Air Protect® Side Impact Technology as “the most innovative and groundbreaking safety feature ever offered in a car seat.” *Id.*

28. Dorel Juvenile continues to market the Air Protect® technology as designed to “protect your child’s head in a side-impact crash,” noting that side-impact collisions are “especially dangerous for children” and responsible for a third of child car crash fatalities. *See* Maxi-Cosi, “Why select a car seat with AirProtect® technology?” (last visited Jan. 25, 2021), attached as Ex. H. Dorel Juvenile explains that the Air Protect® “technology reduces the impact forces around your little one’s head by diverting them away from your child and absorbing them into the headrest.” *Id.* More specifically, “Air Protect helps to divert crash energy away from the child, releasing air on impact to immediately reducing impact forces.”⁸

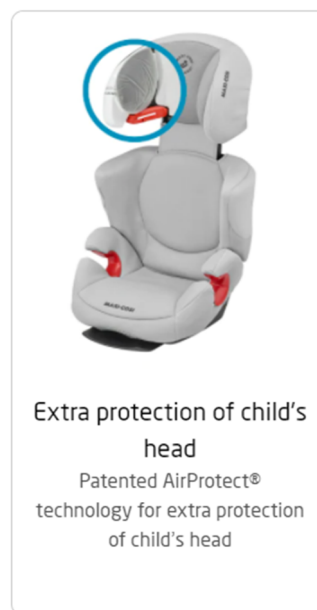
29. The image below illustrates how the Air Protect® technology works during side-impact collisions:⁹

⁸ *See* <https://www.maxicosi.com/us-en/service-support/frequently-asked-questions/#320>.

⁹ *See* <https://www.autoevolution.com/news/new-car-safety-technology-to-protect-your-child-8366.html>. *See also* <https://youtu.be/RleC3PAg-sA>;



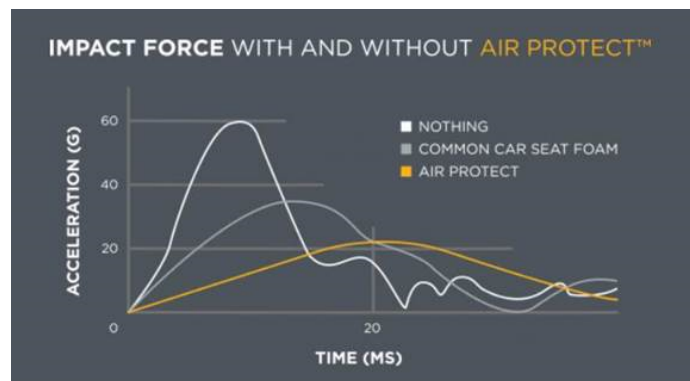
30. As shown in the images below, Dorel Juvenile Air Protect® car seats include an airbag in the headrest to protect a child during side impact conditions:



31. The airbag is filled with air and foam and has numerous vents that release and absorb air to cushion a child's head and neck area ahead of impact:



32. The airbag protects the child during a side-impact collision to the vehicle to reduce head injury and trauma.¹⁰



FIRST CAUSE OF ACTION

Infringement of the '298 Patent by Dorel Juvenile

33. Paragraphs 1–32 are incorporated by reference as if fully restated herein.

34. Dorel Juvenile's products that infringe the '298 patent include, but are not limited to, the Accused Products.

35. Dorel Juvenile makes, uses, sells, offers for sale, and/or imports the Accused Products and components thereof in the United States.

¹⁰ See <https://www.maxi-cosi.co.nz/patent/air-protect>.

36. Dorel Juvenile directly infringes under 35 U.S.C. § 271(a)—literally and/or under the doctrine of equivalents—at least claims 1-16 of the '298 patent by making, using, selling, offering for sale, and/or importing into the United States the Accused Products and components thereof.

37. The claim chart attached as Exhibit I details how the Accused Products literally satisfy each and every limitation of claims 1-16 of the '298 patent.

38. Dorel Juvenile has had actual knowledge of the '298 patent and Dorel Juvenile's unauthorized use thereof at least as early as the filing of this complaint. Dorel Juvenile has been aware of Cozy's patent portfolio since at least July 2009, and on information and belief has been monitoring the same. As a result, Dorel Juvenile has very likely been actually aware of the '298 patent, and its unauthorized use of the same, since February 27, 2018.

39. Dorel Juvenile has knowingly and actively induced infringement of the '298 patent by customers and users of the Accused Products, and has done so with specific intent to induce infringement, and/or with willful blindness to the possibility that its acts induce infringement in violation of 35 U.S.C. § 271(b), through activities relating to selling, marketing, advertising, promoting, supporting, and/or distributing the Accused Products and components thereof in the United States.

40. Dorel Juvenile knowingly and actively contributes to infringement of the '298 patent by offering to sell, selling, and importing into the United States the Accused Products and components thereof, including, for example, the Air Protect® technology, in violation of 35 U.S.C. § 271(c). Such components are substantial, material parts of the claimed inventions of the '298 patent and have no substantial non-infringing use. The foregoing activities are ongoing.

41. Dorel Juvenile deliberately and knowingly instructs its customers and users to use the Accused Products in a way that infringes at least claim 1 of the '298 patent as described above and in the attached exhibits, at least through their marketing, promotional, and instructional materials, to use the infringing Accused Products in an infringing way.

42. Dorel Juvenile knowingly advertises and instructs third parties—*e.g.*, their customers and other users—how to use the Accused Products in a way that infringes at least claim 1-16 of the '298 patent, and such activity is ongoing.

43. Dorel Juvenile's infringement has been and is knowing, deliberate, and willful.

44. Dorel Juvenile's infringement of the '298 patent has damaged and continues to damage Cozy through its ongoing infringement.

45. Dorel Juvenile's infringing acts are causing and will continue to cause Cozy irreparable harm, for which there is no adequate remedy at law. Under 35 U.S.C. § 283, Cozy is entitled to a permanent injunction against further infringement.

46. This case is exceptional, entitling Cozy to enhanced damages under 35 U.S.C. § 284 and an award of attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

SECOND CAUSE OF ACTION

Infringement of the '739 Patent by Dorel Juvenile

47. Paragraphs 1–46 are incorporated by reference as if fully restated herein.

48. Dorel Juvenile's products that infringe the '739 patent include, but are not limited to, the Accused Products.

49. Dorel Juvenile makes, uses, sells, offers for sale, and/or imports the Accused Products and components thereof in the United States.

50. Dorel Juvenile directly infringes under 35 U.S.C. § 271(a)—literally and/or under the doctrine of equivalents—at least claims 1-17 of the '739 patent by making, using, selling, offering for sale, and/or importing into the United States the Accused Products and components thereof.

51. The claim chart attached as Exhibit J details how the Accused Products literally satisfy each and every limitation of claims 1-17 of the '739 patent.

52. Dorel Juvenile has had actual knowledge of the '739 patent and Dorel Juvenile's unauthorized use thereof at least as early as the filing of this complaint. Dorel Juvenile has been aware of Cozy's patent portfolio since at least July 2009, and on information and belief has been monitoring the same. As a result, Dorel Juvenile has very likely been actually aware of the '739 patent, and its unauthorized use of the same, since June 6, 2017.

53. Dorel Juvenile has knowingly and actively induced infringement of the '739 patent by customers and users of the Accused Products, and has done so with specific intent to induce infringement, and/or with willful blindness to the possibility that its acts induce infringement in violation of 35 U.S.C. § 271(b), through activities relating to selling, marketing, advertising, promoting, supporting, and/or distributing the Accused Products and components thereof in the United States.

54. Dorel Juvenile knowingly and actively contributes to infringement of the '739 patent by offering to sell, selling, and importing into the United States the Accused Products and components thereof, including, for example, the Air Protect® technology, in violation of 35 U.S.C. § 271(c). Such components are substantial, material parts of the claimed inventions of the '739 patent and have no substantial non-infringing use. The foregoing activities are ongoing.

55. Dorel Juvenile deliberately and knowingly instructs its customers and users to use the Accused Products in a way that infringes at least claim 1 of the '739 patent as described above and in the attached exhibits, at least through their marketing, promotional, and instructional materials, to use the infringing Accused Products in an infringing way.

56. Dorel Juvenile knowingly advertises and instructs third parties—*e.g.*, their customers and other users—how to use the Accused Products in a way that infringes at least claims 1-17 of the '739 patent, and such activity is ongoing.

57. Dorel Juvenile's infringement has been and is knowing, deliberate, and willful.

58. Dorel Juvenile's infringement of the '739 patent has damaged and continues to damage Cozy through its ongoing infringement.

59. Dorel Juvenile's infringing acts are causing and will continue to cause Cozy irreparable harm, for which there is no adequate remedy at law. Under 35 U.S.C. § 283, Cozy is entitled to a permanent injunction against further infringement.

60. This case is exceptional, entitling Cozy to enhanced damages under 35 U.S.C. § 284 and an award of attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

THIRD CAUSE OF ACTION

Infringement of the '835 Patent by Dorel Juvenile

61. Paragraphs 1–60 are incorporated by reference as if fully restated herein.

62. Dorel Juvenile's products that infringe the '835 patent include, but are not limited to, the Accused Products.

63. Dorel Juvenile makes, uses, sells, offers for sale, and/or imports the Accused Products and components thereof in the United States.

64. Dorel Juvenile directly infringe under 35 U.S.C. § 271(a)—literally and/or under the doctrine of equivalents—at least claims 1-3 of the '835 patent by making, using, selling, offering for sale, and/or importing into the United States the Accused Products and components thereof.

65. The claim chart attached as Exhibit K details how the Accused Products literally satisfy each and every limitation of claims 1-3 of the '835 patent.

66. Dorel Juvenile has had actual knowledge of the '835 patent and Dorel Juvenile's unauthorized use thereof at least as early as May 2015.

67. Dorel Juvenile has knowingly and actively induced infringement of the '835 patent by customers and users of the Accused Products, and has done so with specific intent to induce infringement, and/or with willful blindness to the possibility that its acts induce infringement in violation of 35 U.S.C. § 271(b), through activities relating to selling, marketing, advertising, promoting, supporting, and/or distributing the Accused Products and components thereof in the United States.

68. Dorel Juvenile knowingly and actively contributes to infringement of the '835 patent by offering to sell, selling, and importing into the United States the Accused Products and components thereof, including, for example, the Air Protect® technology, in violation of 35 U.S.C. § 271(c). Such components are substantial, material parts of the claimed inventions of the '835 patent and have no substantial non-infringing use. The foregoing activities are ongoing.

69. Dorel Juvenile deliberately and knowingly instructs its customers and users to use the Accused Products in a way that infringes at least claim 1 of the '835 patent as described above and in the attached exhibits, at least through their marketing, promotional, and instructional materials, to use the infringing Accused Products in an infringing way.

70. Dorel Juvenile knowingly advertises and instructs third parties—*e.g.*, their customers and other users—how to use the Accused Products in a way that infringes at least claims 1-3 of the '835 patent, and such activity is ongoing.

71. Dorel Juvenile's infringement has been and is knowing, deliberate, and willful.

72. Dorel Juvenile's infringement of the '835 patent has damaged and continues to damage Cozy through its ongoing infringement.

73. Dorel Juvenile's infringing acts are causing and will continue to cause Cozy irreparable harm, for which there is no adequate remedy at law. Under 35 U.S.C. § 283, Cozy is entitled to a permanent injunction against further infringement.

74. This case is exceptional, entitling Cozy to enhanced damages under 35 U.S.C. § 284 and an award of attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

FOURTH CAUSE OF ACTION

Infringement of the '416 Patent by Dorel Juvenile

75. Paragraphs 1–74 are incorporated by reference as if fully restated herein.

76. Dorel Juvenile's products that infringe the '416 patent include, but are not limited to, the Accused Products.

77. Dorel Juvenile makes, uses, sells, offers for sale, and/or imports the Accused Products and components thereof in the United States.

78. Dorel Juvenile directly infringe under 35 U.S.C. § 271(a)—literally and/or under the doctrine of equivalents—at least claims 1-4, 6, 8 and 10 of the '416 patent by making, using, selling, offering for sale, and/or importing into the United States the Accused Products and components thereof.

79. The claim chart attached as Exhibit L details how the Accused Products literally satisfy each and every limitation of claims 1-4, 6, 8 and 10 of the '416 patent.

80. Dorel Juvenile has had actual knowledge of the '416 patent and Dorel Juvenile's unauthorized use thereof at least as early as May 2015.

81. Dorel Juvenile has knowingly and actively induced infringement of the '416 patent by customers and users of the Accused Products, and has done so with specific intent to induce infringement, and/or with willful blindness to the possibility that its acts induce infringement in violation of 35 U.S.C. § 271(b), through activities relating to selling, marketing, advertising, promoting, supporting, and/or distributing the Accused Products and components thereof in the United States.

82. Dorel Juvenile knowingly and actively contributes to infringement of the '416 patent by offering to sell, selling, and importing into the United States the Accused Products and components thereof, including, for example, the Air Protect® technology, in violation of 35 U.S.C. § 271(c). Such components are substantial, material parts of the claimed inventions of the '416 patent and have no substantial non-infringing use. The foregoing activities are ongoing.

83. Dorel Juvenile deliberately and knowingly instructs its customers and users to use the Accused Products in a way that infringes at least claims 1-4, 6, 8 and 10 of the '416 patent as described above and in the attached exhibits, at least through their marketing, promotional, and instructional materials, to use the infringing Accused Products in an infringing way.

84. Dorel Juvenile knowingly advertises and instructs third parties—*e.g.*, their customers and other users—how to use the Accused Products in a way that infringes at least claim 1-4, 6, 8 and 10 of the '416 patent, and such activity is ongoing.

85. Dorel Juvenile's infringement has been and is knowing, deliberate, and willful.

86. Dorel Juvenile's infringement of the '416 patent has damaged and continues to damage Cozy through its ongoing infringement.

87. Dorel Juvenile's infringing acts are causing and will continue to cause Cozy irreparable harm, for which there is no adequate remedy at law. Under 35 U.S.C. § 283, Cozy is entitled to a permanent injunction against further infringement.

88. This case is exceptional, entitling Cozy to enhanced damages under 35 U.S.C. § 284 and an award of attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

JURY DEMAND

89. Cozy requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

WHEREFORE, Cozy requests that the Court find in Cozy's favor and against Dorel Juvenile, and that the Court grant Cozy the following relief:

- a) A judgment that each of the Patents-in-Suit is infringed, directly and/or indirectly, by Dorel Juvenile's manufacture, use, sale, and/or offers to sell in the United States of the Accused Products;
- b) An order permanently enjoining Dorel Juvenile, its affiliates and/or subsidiaries, and each of their officers, agents, servants and employees and those acting in privity or concert with them, from making, offering to sell, selling, using, or importing into the United States the Accused Products or any product infringing any claim of the patents-in-suit, until after the expiration of the patents-in-suit, respectively, including any extensions and/or additional periods of exclusivity to which Cozy is or becomes entitled;

- c) An order awarding damages under 35 U.S.C. § 284 in an amount sufficient to compensate Cozy for its damages arising from direct and indirect infringement by Defendants, including but not limited to a reasonable royalty, together with pre-judgment and post-judgment interest, and costs;
- d) An order awarding treble damages for willful infringement by Defendants, pursuant to 35 U.S.C. § 284;
- e) A judgment including pre-judgment interest under A.R.S. § 44-1201 at 10%;
- f) An accounting and/or supplemental damages for all damages occurring after any discovery cutoff;
- g) A judgment declaring that this case is exceptional and awarding Cozy reasonable costs and attorneys' fees pursuant to 35 U.S.C. § 285; and
- h) Such further and other relief as this Court deems appropriate and just.

Dated: January 27, 2021

Respectfully submitted,

/s/ Joel Leeman

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