

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

MINISTRAP, LLC,

Plaintiff,

v.

QUIKTRIP CORPORATION,

Defendant.

NO. 2:21-CV-00410-JRG-RSP

**JURY TRIAL DEMANDED**

**FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Ministrap, LLC (“Ministrap”) files this First Amended Complaint against QuikTrip Corporation (“Defendant”) alleging, based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

**PARTIES**

1. Plaintiff is a limited liability company formed under the laws of Georgia with its registered office address located in Atlanta, GA.
2. Defendant is a corporation organized and existing under the laws of Oklahoma with its principal place of business at 4705 South 129th East Avenue, Tulsa, OK 74134-7008.
3. Defendant is registered to do business in Texas, and can be served at its registered service address: CT Corporation System, 1999 Bryan St., Suite 900, Dallas, TX 75201-3136.

**JURISDICTION AND VENUE**

4. Ministrap repeats and re-alleges the allegations in Paragraphs 1-3 as though fully set forth in their entirety.
5. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject matter jurisdiction of the action

under 28 U.S.C. § 1331 and § 1338(a).

6. Venue is proper against Defendant in this District pursuant to 28 U.S.C. § 1400(b) and 1391(c) because it has maintained established and regular places of business in this District and has committed acts of patent infringement in the District. *See In re Cray Inc.*, 871 F.3d 1355, 1362-63 (Fed. Cir. 2017).

7. Defendant is subject to this Court's specific and general personal jurisdiction under due process and/or the Texas Long Arm Statute due at least to Defendant's substantial business in this judicial district, 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, or deriving substantial revenue from goods and services provided to individuals in Texas and in this district.

8. Specifically, Defendant intends to do and does business in, has committed acts of infringement in, and continues to commit acts of infringement in the Eastern District of Texas directly, through intermediaries, by contributing to and through their inducement of third parties, and offer their products or services, including those accused of infringement here, to customers and potential customers located in Texas, including in the Eastern District of Texas.

9. Defendant maintains regular and established places of business in the Eastern District of Texas.

10. For example, Defendant owns, operates, manages, and conducts business from facilities at several locations in the Eastern District of Texas, including, but not limited to, facilities at the following addresses: 3512 S Main St, Lindale, TX 75706; 1100 E Spring Creek Pkwy, Plano, TX 75074; 4608 W Plano Pkwy, Plano, TX 75093; 450 E Bethany Dr, Allen, TX 75002; 6400 Preston Rd, Plano, TX 75024; and 6425 W Park Blvd, Plano, TX 75093.

11. Defendant commits acts of infringement in this district, including, but not limited

to, from the locations identified in the preceding paragraph, and including, but not limited to, the sale, offer for sale, and use of the Accused Instrumentalities and inducement of third parties to sale, offer for sell, and use the Accused Instrumentalities.

### **THE ASSERTED PATENTS AND ACCUSED INSTRUMENTALITIES**

12. Ministrap repeats and re-alleges the allegations in Paragraphs 1-11 as though fully set forth in their entirety.

13. Defendant uses, causes to be used, provides, supplies, or distributes one or more products featuring binding straps, fastening straps, and/or strap systems, including, but not limited to, various replacement cables featuring the brand name “SOLARAY” that include straps or strap systems (the “Accused Instrumentalities”), e.g.:



14. The Accused Instrumentalities therefore include straps and/or strap systems that

secure various objects including, but not limited to, elongated items such as cables and wires.

15. The strap and/or strap systems included in the Accused Instrumentalities include a first fastening loop and a second fastening loop to secure a single item or multiple items together.

16. The first fastening loop and second fastening loop securely attach the elongated item or items together in a manner that aids in avoiding tangling, provides a clean appearance, and also enables multiple elongated items to be attached to each other or multiple sections of a single elongated item to be attached to each other.

17. For these reasons and the additional reasons detailed below, the Accused Instrumentalities practice at least one claim of U.S. Patent No. 7,587,796 (the “’796 patent”), U.S. Patent No. 8,371,000 (the “’000 patent”), and U.S. Patent No. 9,386,824 (the “’824 patent”) (collectively, the “Asserted Patents”).

## **COUNT I**

### **INFRINGEMENT OF U.S. PATENT NO. 7,587,796**

18. Ministrap repeats and re-alleges the allegations in Paragraphs 1-17 as though fully set forth in their entirety.

19. Ministrap owns all substantial rights, interest, and title in and to the ’796 patent, including the sole and exclusive right to prosecute this action and enforce the ’796 patent against infringers and to collect damages for all relevant times. The United States Patent and Trademark Office duly issued the ’796 patent on September 15, 2009. A true and correct copy of the ’796 patent is attached as Exhibit A.

20. The ’796 patent is titled “Secure Strap Systems.”

21. The claims of the ’796 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include

inventive components that improve upon the function and operation of self-fastening straps made of self-fastening material.

22. The written description of the '796 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

23. Defendant has directly infringed the '796 patent by using, providing, supplying, or distributing the Accused Instrumentalities.

24. Defendant has directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '796 patent.

25. For example, the Accused Instrumentalities include a fastening strap system relating to securing at least two elements to be secured.

26. The fastening strap system of the Accused Instrumentalities comprises: a) at least one first elongated strap portion each comprising, i) at least one first strap end portion, ii) at least one first strap width, and iii) at least one first strap length; b) at least one second elongated strap portion each comprising, i) at least one second strap end portion, ii) at least one second strap width, and iii) at least one second strap length; c) at least one aperture comprising, i) at least one aperture width, and ii) at least one aperture length; d) wherein said fastening strap system consists essentially of a unitary portion of flexible sheet material; e) wherein said unitary portion of flexible sheet material comprises, i) a first side having its entire first-side surface substantially comprising at least one first fastening surface, and ii) a second side having its entire second-side surface substantially comprising at least one second fastening surface adapted to be detachably fastenable

to said at least one first fastening surface; f) wherein all said at least one first elongated strap portions and all said at least one second elongated strap portions are parallel and collinear; g) wherein said at least one aperture is located between said at least one first strap end portion of said at least one first elongated strap portion and said at least one second strap end portion of said at least one second elongated strap portion; and h) wherein said at least one aperture width is sized so as to be able to receive said at least one first elongated strap portion without requiring twisting along at least one longitudinal axis of said at least one first strap length of said at least one first elongated strap portion; i) wherein said second strap width without bending or folding along said at least one second strap length of said at least one second elongated strap portion, prevents insertion of said at least one second elongated strap portion into said at least one aperture; j) wherein said at least one first fastening surface comprises at least one hook fastening surface; k) wherein said at least one second fastening surface comprises at least one complementary fastening surface; l) wherein said fastening system is structured and arranged to form at least one first fastening loop, such first fastening loop formed by encirclement of said at least one first elongated strap portion around at least one first element to be secured, insertion of at least said first strap end portion of said at least one first elongated strap portion into and through said at least one aperture, and cinching of said at least one first elongated strap portion to secure the at least one first element to be secured, wherein such at least one first fastening loop is secured by connection of said at least one first fastening surface with said at least one second fastening surface, wherein such fastening is finely adjustable; and m) wherein said fastening system is further structured and arranged to form at least one second fastening loop formed by encirclement of said at least one second elongated strap portion around at least one second element to be secured wherein such at least one second fastening loop is secured by connection of said at least one first fastening surface

with said at least one second fastening surface, wherein such fastening is finely adjustable.

27. Ministrap has been damaged as a result of the infringing conduct by Defendant alleged above. Defendant is liable to Ministrap in an amount that compensates it for such infringements, 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.

28. Ministrap or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '796 patent.

29. Since at least the time of receiving the Original Complaint, Defendant has also indirectly infringed the '796 patent by inducing others to directly infringe the '796 patent. Defendant has induced end-users, including, but not limited to, Defendant's customers, employees, partners, or contractors, to directly infringe, either literally or under the doctrine of equivalents, the '796 patent by providing or requiring use of the Accused Instrumentalities. Defendant took active steps, directly or through contractual relationships with others, with the specific intent to cause them to use the Accused Instrumentalities in a manner that infringes one or more claims of the '796 patent, including, for example, claim 1 of the '796 patent. Such steps by Defendant included, among other things, advising or directing personnel, contractors, or end-users to use the Accused Instrumentalities in an infringing manner; advertising and promoting the use of the Accused Instrumentalities in an infringing manner; or distributing instructions that guide users to use the Accused Instrumentalities in an infringing manner. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '796 patent and with the knowledge that the induced acts constitute infringement. Defendant is aware that the normal and customary use of the Accused Instrumentalities by others would infringe the '796 patent.

Defendant's inducement is ongoing.

30. Defendant has also indirectly infringed by contributing to the infringement of the '796 patent. Defendant has contributed to the direct infringement of the '796 patent by its personnel, contractors, and customers. The Accused Instrumentalities have special features that are specially designed to be used in an infringing way and that have no substantial uses other than ones that infringe one or more claims of the '796 patent, including, for example, claim 1 of the '796 patent. The special features include, for example, the system of claim 1 that allows the claimed strap system to form two fastening loops. The special features constitute a material part of the invention of one or more of the claims of the '796 patent and are not staple articles of commerce suitable for substantial non-infringing use. Defendant's contributory infringement is ongoing.

31. Defendant had knowledge of the '796 patent at least as of the date when they were notified of the filing of this action.

32. Furthermore, on information and belief, Defendant has a policy or practice of not reviewing the patents of others, including instructing its employees to not review the patents of others, and thus have been willfully blind of Ministrap's patent rights.

33. Defendant's actions are at least objectively reckless as to the risk of infringing a valid patent and this objective risk was either known or should have been known by Defendant.

34. Defendant's direct infringement of the '796 patent is, has been, and continues to be willful, intentional, deliberate, or in conscious disregard of Ministrap's rights under the patent.

35. Ministrap has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant is liable to Ministrap in an amount that compensates it for such infringements, 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.

36. Ministrap has suffered irreparable harm, through its loss of market share and goodwill, for which there is no adequate remedy at law. Ministrap has and will continue to suffer this harm by virtue of Defendant's infringement of the '796 patent. Defendant's actions have interfered with and will interfere with Ministrap's ability to license technology. The balance of hardships favors Ministrap's ability to commercialize its own ideas and technology. The public interest in allowing Ministrap to enforce its right to exclude outweighs other public interests, which supports injunctive relief in this case.

## **COUNT II**

### **INFRINGEMENT OF U.S. PATENT NO. 8,371,000**

37. Ministrap repeats and re-alleges the allegations in Paragraphs 1-17 as though fully set forth in their entirety.

38. Ministrap owns all substantial rights, interest, and title in and to the '000 patent, including the sole and exclusive right to prosecute this action and enforce the '000 patent against infringers and to collect damages for all relevant times. The United States Patent and Trademark Office duly issued the '000 patent on February 12, 2013. A true and correct copy of the '000 patent is attached as Exhibit B. The '000 patent is a continuation-in-part of the '796 patent.

39. The '000 patent is titled "Secure Strap Systems."

40. The claims of the '000 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of self-fastening straps made of self-fastening material.

41. The written description of the '000 patent describes in technical detail each

limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

42. Defendant has directly infringed the '000 patent by using, providing, supplying, or distributing the Accused Instrumentalities.

43. Defendant has directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '000 patent.

44. For example, the Accused Instrumentalities include a fastening strap system relating to securing at least two elements.

45. The fastening strap system of the Accused Instrumentalities consisting of: a) at least one first strap portion having, i) at least one first strap end portion, ii) at least one first strap length, and iii) at least one first strap width; and b) at least one second strap portion having, i) at least one second strap end portion, ii) at least one second strap length, and iii) at least one second strap width; c) wherein said at least one first strap portion has, i) at least one first side comprising at least one first fastening surface covering substantially all of said at least one first side, and ii) at least one second side comprising at least one second fastening surface covering substantially all of said at least one second side; iii) wherein said at least one first fastening surface is structured and arranged to be detachably fastenable to said at least one second fastening surface; d) wherein said at least one second strap portion is offset parallel from said first strap portion a distance about equal to said at least one first strap width; e) wherein all said at least one first strap portions and all said at least one second strap portions are parallel.

46. Ministrap has been damaged as a result of the infringing conduct by Defendant

alleged above. Defendant is liable to Ministrap in an amount that compensates it for such infringements, 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.

47. Ministrap or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '000 patent.

48. Since at least the time of receiving this Complaint, Defendant has also indirectly infringed the '000 patent by inducing others to directly infringe the '000 patent. Defendant has induced end-users, including, but not limited to, Defendant's customers, employees, partners, or contractors, to directly infringe, either literally or under the doctrine of equivalents, the '000 patent by providing or requiring use of the Accused Instrumentalities. Defendant took active steps, directly or through contractual relationships with others, with the specific intent to cause them to use the Accused Instrumentalities in a manner that infringes one or more claims of the '000 patent, including, for example, claim 1 of the '000 patent. Such steps by Defendant included, among other things, advising or directing personnel, contractors, or end-users to use the Accused Instrumentalities in an infringing manner; advertising and promoting the use of the Accused Instrumentalities in an infringing manner; or distributing instructions that guide users to use the Accused Instrumentalities in an infringing manner. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '000 patent and with the knowledge that the induced acts constitute infringement. Defendant is aware that the normal and customary use of the Accused Instrumentalities by others would infringe the '000 patent. Defendant's inducement is ongoing.

49. Defendant has also indirectly infringed by contributing to the infringement of the

'000 patent. Defendant has contributed to the direct infringement of the '000 patent by its personnel, contractors, and customers. The Accused Instrumentalities have special features that are specially designed to be used in an infringing way and that have no substantial uses other than ones that infringe one or more claims of the '000 patent, including, for example, claim 1 of the '000 patent. The special features include, for example, the system of claim 1 that allows the claimed strap system to form two fastening straps. The special features constitute a material part of the invention of one or more of the claims of the '000 patent and are not staple articles of commerce suitable for substantial non-infringing use. Defendant's contributory infringement is ongoing.

50. Defendant had knowledge of the '000 patent at least as of the date when they were notified of the filing of this Count.

51. Furthermore, on information and belief, Defendant has a policy or practice of not reviewing the patents of others, including instructing its employees to not review the patents of others, and thus have been willfully blind of Ministrap's patent rights.

52. Defendant's actions are at least objectively reckless as to the risk of infringing a valid patent and this objective risk was either known or should have been known by Defendant.

53. Defendant's direct infringement of the '000 patent is, has been, and continues to be willful, intentional, deliberate, or in conscious disregard of Ministrap's rights under the patent.

54. Ministrap has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant is liable to Ministrap in an amount that compensates it for such infringements, 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.

55. Ministrap has suffered irreparable harm, through its loss of market share and

goodwill, for which there is no adequate remedy at law. Ministrap has and will continue to suffer this harm by virtue of Defendant's infringement of the '000 patent. Defendant's actions have interfered with and will interfere with Ministrap's ability to license technology. The balance of hardships favors Ministrap's ability to commercialize its own ideas and technology. The public interest in allowing Ministrap to enforce its right to exclude outweighs other public interests, which supports injunctive relief in this case.

### **COUNT III**

#### **INFRINGEMENT OF U.S. PATENT NO. 9,386,824**

56. Ministrap repeats and re-alleges the allegations in Paragraphs 1-17 as though fully set forth in their entirety.

57. Ministrap owns all substantial rights, interest, and title in and to the '824 patent, including the sole and exclusive right to prosecute this action and enforce the '824 patent against infringers and to collect damages for all relevant times. The United States Patent and Trademark Office duly issued the '824 patent on July 12, 2016. A true and correct copy of the '824 patent is attached as Exhibit C. The '824 patent is a continuation-in-part of the '000 patent.

58. The '824 patent is titled "Secure Strap Systems."

59. The claims of the '824 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of self-fastening straps made of self-fastening material.

60. The written description of the '824 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from

and improved upon what may have been considered conventional or generic in the art at the time of the invention.

61. Defendant has directly infringed the '824 patent by using, providing, supplying, or distributing the Accused Instrumentalities.

62. Defendant has directly infringed, either literally or under the doctrine of equivalents, at least claim 1 of the '824 patent.

63. For example, the Accused Instrumentalities include a fastening strap system relating to securing at least two elements.

64. Defendant has directly infringed by performing a method of using the fastening strap system of the Accused Instrumentalities to secure at least one first longitudinal element and at least one second longitudinal element, the method comprising the steps of: a) providing at least one fastening strap system with a base, the fastening strap system comprising, i) at least one first strap end portion comprising, (1) at least one first strap end portion extending inseparably from the base and (2) at least one first strap width, and ii) at least one second elongated strap portion comprising, (1) at least one second strap end portion extending inseparably from the base, wherein the at least one first strap end portion and the at least one second strap end portion are divided and offset in parallel from each other, (2) at least one second strap width, iii) wherein the fastening strap system consists of a unitary portion of flexible sheet material; iv) wherein the unitary portion of flexible sheet material comprises, (1) at least one first side comprising at least one first fastening surface and (2) at least one second side comprising at least one second fastening surface adapted to be detachably fastenable to the at least one first fastening surface, v) wherein the second elongated strap portion is offset parallel from such first elongated strap portion a distance about equal to the at least one first strap width, and vi) wherein all the at least one first elongated strap

portions and all the at least one second elongated strap portions are parallel; b) folding the at least one first elongated strap portion around the at least one first longitudinal element; c) folding the at least second elongated strap portion around the at least one second longitudinal element; d) cinching the at least one first elongated strap portion; and e) cinching the at least one second elongated strap portion.

65. Ministrap has been damaged as a result of the infringing conduct by Defendant alleged above. Defendant is liable to Ministrap in an amount that compensates it for such infringements, 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.

66. Ministrap or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '824 patent.

67. Since at least the time of receiving this Complaint, Defendant has also indirectly infringed the '824 patent by inducing others to directly infringe the '824 patent. Defendant has induced end-users, including, but not limited to, Defendant's customers, employees, partners, or contractors, to directly infringe, either literally or under the doctrine of equivalents, the '824 patent by providing or requiring use of the Accused Instrumentalities. Defendant took active steps, directly or through contractual relationships with others, with the specific intent to cause them to use the Accused Instrumentalities in a manner that infringes one or more claims of the '824 patent, including, for example, claim 1 of the '824 patent. Such steps by Defendant included, among other things, advising or directing personnel, contractors, or end-users to use the Accused Instrumentalities in an infringing manner; advertising and promoting the use of the Accused Instrumentalities in an infringing manner; or distributing instructions that guide users to use the

Accused Instrumentalities in an infringing manner. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '824 patent and with the knowledge that the induced acts constitute infringement. Defendant is aware that the normal and customary use of the Accused Instrumentalities by others would infringe the '824 patent. Defendant's inducement is ongoing.

68. Defendant has also indirectly infringed by contributing to the infringement of the '824 patent. Defendant has contributed to the direct infringement of the '824 patent by its personnel, contractors, and customers. The Accused Instrumentalities have special features that are specially designed to be used in an infringing way and that have no substantial uses other than ones that infringe one or more claims of the '824 patent, including, for example, claim 1 of the '824 patent. The special features include, for example, the system of claim 1 that allows the claimed strap system to form two fastening straps. The special features constitute a material part of the invention of one or more of the claims of the '824 patent and are not staple articles of commerce suitable for substantial non-infringing use. Defendant's contributory infringement is ongoing.

69. Defendant had knowledge of the '824 patent at least as of the date when they were notified of the filing of this Count.

70. Furthermore, on information and belief, Defendant has a policy or practice of not reviewing the patents of others, including instructing its employees to not review the patents of others, and thus have been willfully blind of Ministrap's patent rights.

71. Defendant's actions are at least objectively reckless as to the risk of infringing a valid patent and this objective risk was either known or should have been known by Defendant.

72. Defendant's direct infringement of the '824 patent is, has been, and continues to be



willful, intentional, deliberate, or in conscious disregard of Ministrap's rights under the patent.

73. Ministrap has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant is liable to Ministrap in an amount that compensates it for such infringements, 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.

74. Ministrap has suffered irreparable harm, through its loss of market share and goodwill, for which there is no adequate remedy at law. Ministrap has and will continue to suffer this harm by virtue of Defendant's infringement of the '824 patent. Defendant's actions have interfered with and will interfere with Ministrap's ability to license technology. The balance of hardships favors Ministrap's ability to commercialize its own ideas and technology. The public interest in allowing Ministrap to enforce its right to exclude outweighs other public interests, which supports injunctive relief in this case.

### **JURY DEMAND**

Ministrap hereby requests a trial by jury on all issues so triable by right.

### **PRAYER FOR RELIEF**

Ministrap requests that the Court find in its favor and against Defendant, and that the Court grant Ministrap the following relief:

- a. Judgment that one or more claims of the Asserted Patents has been infringed, either literally or under the doctrine of equivalents, by Defendant or others acting in concert therewith;
- b. A permanent injunction enjoining Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in concert therewith from infringement of the Asserted Patents; or, in the alternative, an award of a reasonable ongoing royalty for future infringement of the Asserted Patents by such entities;

c. Judgment that Defendant account for and pay to Ministrap all damages to and costs incurred by Ministrap because of Defendant's infringing activities and other conduct complained of herein;

d. Judgment that Defendant's infringements be found willful, and that the Court award treble damages for the period of such willful infringement pursuant to 35 U.S.C. § 284;

e. Pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein;

f. That this Court declare this an exceptional case and award Ministrap its reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and

g. All other and further relief as the Court may deem just and proper under the circumstances.

Dated: February 1, 2022

Respectfully submitted,

By: /s/ C. Matthew Rozier  
C. Matthew Rozier (CO 46854)\*  
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***Attorneys for Plaintiff Ministrap, LLC***

*\* Admitted to Eastern District of Texas*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service.

Dated: February 1, 2022

By: /s/ C. Matthew Rozier  
C. Matthew Rozier