

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

ETCETERA, LLC, a Tennessee limited liability company,
Plaintiff,
v.
TGS INNOVATIONS, LP, a Texas domestic limited partnership; and X-BLADE SYSTEMS, LP, a Texas domestic limited partnership,
Defendants.

) Case No.
)
) **COMPLAINT FOR**
) **DECLARATORY JUDGMENT**
)
)
) **JURY TRIAL DEMANDED**
)
)
)
)
)

Plaintiff alleges:

PARTIES

1. Plaintiff Etcetera, LLC (hereinafter, "plaintiff") is a Tennessee limited liability company organized and operating under the laws of the State of Tennessee.

2. Plaintiff is informed and believes that defendant TGS Innovations, LP (hereinafter, "TGS") is a Texas domestic limited partnership organized and operating under the laws of the State of Texas with a mailing address at 5032 Showdown Lane, Grand Prairie, Texas 75052.

3. Plaintiff is informed and believes that defendant X-Blade Systems, LP (hereinafter, "X-Blade") is a Texas domestic limited partnership organized and operating under the laws of the State of Texas with a mailing address at 5032 Showdown Lane, Grand Prairie, Texas 75052.

JURISDICTION AND VENUE

4. This action is an action of which this Court has original jurisdiction under 28 U.S.C. §§ 1331, 1338(a), 2201 and 2202 in that it is a declaratory judgment action for patent non-infringement arising under the patent laws of the United States, Title 35, United States Code, Section 100 *et seq.*

LAW OFFICES OF
SCOTT D. JOHANSEN
CALIFORNIA OFFICE
300 W. PAVAN STREET, SUITE 200
SACRAMENTO, CALIFORNIA 95834
TELEPHONE: (916) 441-1100
FAX: (916) 441-1101
WWW.SDJOHANSEN.COM

1 5. This action is an action of which this Court has original jurisdiction under 28 U.S.C. § 1332 in that
2 it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000,
3 exclusive of interest and costs.

4 6. Venue is appropriate in this Court under 28 U.S.C. § 1391 in that a substantial amount of the acts,
5 events and omissions giving rise to this lawsuit occurred in this District; contracts referenced herein were
6 executed in this District; and all defendants herein irrevocably agreed that any legal action or proceeding arising
7 out of or concerning the matters herein may be brought only in the courts of the State of Tennessee or of the
8 United States of America for the Middle District of Tennessee, expressly submitted to the personal jurisdiction
9 and the venue of this Court for the purposes hereof, and expressly waived any claim of improper venue and any
10 claim that this Court is an inconvenient forum. This lawsuit should be assigned to the Nashville Division of
11 this Court because a substantial part of the events or omissions which give rise to this lawsuit occurred in
12 Davidson County.

13 **ALLEGATIONS COMMON TO ALL CLAIMS FOR RELIEF**

14 7. Plaintiff is informed and believes that Stephen Else (hereinafter, “Else”) is a dual citizen of both the
15 United Kingdom of Great Britain and Northern Ireland, commonly known as the United Kingdom, and the
16 United States of America. Plaintiff is informed and believes that Else resides in the State of Texas.

17 8. Plaintiff is informed and believes that Thomas Stephens (hereinafter, “Stephens” and “Inventor”))
18 is a citizen of and resides in the State of Texas and is a partner in TGS and X-Blade.

19 9. Plaintiff is informed and believes that Stephens is the inventor of the following technology and
20 intellectual property (hereinafter, “Patent 1” (see **Exhibit 1** attached hereto)):

21 Swash plate internal combustion engine (US Patent No. 7,137,366) – A power-
22 generation device comprising at least one cylinder, at least one cylinder head, at
23 least one piston and an output shaft, having a central axis having a fixed angular
24 relationship to the central axis of the cylinder. A swash plate, having a first swash
25 plate surface having a normal axis disposed at a first fixed angle to the central axis
of the output shaft, is fixed to the output shaft. At least one connecting rod is
connected to at least one piston. At least one follower is secured to the second end
of a connecting rod. The first follower surface contacts, and conforms to, the
orientation of the first swash plate surface.

26 10. Plaintiff is informed and believes that Stephens is the inventor of the following technology and
27 intellectual property (hereinafter, “Patent 2” (see **Exhibit 2** attached hereto)):
28

1 Rotary wing aircraft (US Patent No. 7,370,828) – A rotary wing aircraft is
2 provided with longitudinally oriented counter-rotating rotors with
3 circumferentially spaced variable pitch elongated rotor blades connected at
4 their opposite ends to rotatable support rings mounted on the aircraft fuselage.
5 Rotor downwash may be guided laterally and longitudinally by respective sets
6 of moveable guide vanes. Propulsion may be obtained by an engine providing
7 thrust and power take-off for driving the rotors. An auxiliary or second engine
8 may be drivingly connected to the rotors.

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
11. Plaintiff is informed and believes that Stephens is the inventor of the following technology and intellectual property (hereinafter, “Patent 3” (see **Exhibit 3** attached hereto)):

Wind driven power generator (US Patent No. 7,365,448) – A wind driven generator includes a rotor disposed in a cylindrical duct and supported by a frame for rotation in response to wind flowing through the duct. The rotor includes plural circumferentially spaced paralleled rotor blades supported for rotation about a generally horizontal axis. Each blade is supported for pivotal movement to change blade pitch, angle of attack or camber as the rotor rotates. A pitch or camber control motor or self-governing wind vane mechanism is operable to move a circular cam to vary blade pitch or camber to control rotor speed. The duct is mounted on a mast having a base supported on a foundation for pivotal movement to face the wind for maximizing airflow through the duct. Electric power generators are connected to opposite ends of the rotor at respective power output or drive shafts.

12. Plaintiff is informed and believes that in or about September 2004 Stephens assigned in part to and retained in part from TGS his right, title and interest in and to Patent 1 (hereinafter, “Assignment 1”). Plaintiff is informed and believes that Assignment 1 was made without valuable consideration and that Assignment 1 was procured by Else from Stephens through concealment, misrepresentations and/or false pretenses.

13. Plaintiff is informed and believes that in or about May 2005 Stephens assigned in part to and retained in part from X-Blade his right, title and interest in and to Patent 2 (hereinafter, “Assignment 2”). Plaintiff is informed and believes that Assignment 2 was made without valuable consideration and that Assignment 2 was procured by Else from Stephens through concealment, misrepresentations and/or false pretenses.

14. Plaintiff is informed and believes that in or about August 2006 Stephens assigned in part to and retained in part from X-Blade his right, title and interest in and to Patent 3 (hereinafter, “Assignment 3”). Plaintiff is informed and believes that Assignment 3 was made without valuable consideration and that Assignment 3 was procured by Else from Stephens through concealment, misrepresentations and/or false pretenses.

1 15. Plaintiff is informed and believes that before the formation of TGS by Stephens and Else, Else
2 represented to Stephens that Else would make certain monetary capital contributions to the partnership upon its
3 formation (hereinafter, the “TGS Else Contributions”). Plaintiff is informed and believes that for Stephens’ part
4 and in reasonable reliance on Else’s promises and assurances to make the TGS Else Contributions, Stephens
5 agreed make certain property capital contributions to the partnership upon its formation, which included
6 Stephens’ assignment of certain of the Inventor’s Rights as hereinafter defined (hereinafter, the “TGS Stephens
7 Contributions”).

8 16. Plaintiff is informed and believes that upon its formation, TGS was to be owned in perpetuity, 50%
9 by Stephens and 50% by Else without dilution of their respective ownership interests. Plaintiff is informed and
10 believes that the TGS Stephens Contributions were to be controlled by TGS subject to certain restrictions and in
11 perpetuity, 50% by Stephens and 50% by Else. Plaintiff is informed and believes that the TGS Else
12 Contributions were to be used by TGS, in part, to pay an agreed-upon salary to Stephens as part of the
13 consideration for the TGS Stephens Contributions. Plaintiff is informed and believes that this agreed-upon
14 salary was material to Stephens’ decision to make the TGS Stephens Contributions in the first instance and that
15 this agreed-upon salary was not paid to Stephens by Else or TGS. Plaintiff is informed and believes that TGS
16 was formed by Else through concealment, misrepresentations and/or false pretenses and without sufficient and
17 adequate consideration being given by Else.

18 17. Plaintiff is informed and believes that before the formation of X-Blade by Stephens and Else, Else
19 represented to Stephens that Else would make certain monetary capital contributions to the partnership upon its
20 formation (hereinafter, the “X-Blade Else Contributions”). Plaintiff is informed and believes that for Stephens’
21 part and in reasonable reliance on Else’s promises and assurances to make the X-Blade Else Contributions,
22 Stephens agreed make certain property capital contributions to the partnership upon its formation, which
23 included Stephens’ assignment of certain of the Inventor’s Rights as hereinafter defined (hereinafter, the “X-
24 Blade Stephens Contributions”).

25 18. Plaintiff is informed and believes that upon its formation, X-Blade was to be owned in perpetuity,
26 50% by Stephens and 50% by Else without dilution of their respective ownership interests. Plaintiff is
27 informed and believes that the X-Blade Stephens Contributions were to be controlled by X-Blade subject to
28 certain restrictions and in perpetuity, 50% by Stephens and 50% by Else. Plaintiff is informed and believes that

1 the X-Blade Else Contributions were to be used by X-Blade, in part, to pay an agreed-upon salary to Stephens
2 as part of the consideration for the X-Blade Stephens Contributions. Plaintiff is informed and believes that this
3 agreed-upon salary was material to Stephens' decision to make the X-Blade Stephens Contributions in the first
4 instance and that this agreed-upon salary was not paid to Stephens by Else or X-Blade. Plaintiff is informed
5 and believes that X-Blade was formed by Else through concealment, misrepresentations and/or false pretenses
6 and without sufficient and adequate consideration being given by Else.

7 19. Stephens assigned to plaintiff his and his affiliates' retained individual, TGS and X-Blade rights,
8 titles and interests (choate or inchoate) in (i) Patent 1 (ii) all precursors, portions and work in progress with
9 respect thereto and all inventions, works of authorship, mask works, technology, information, know-how,
10 materials and tools relating thereto or to the development, support or maintenance thereof and (iii) all
11 copyrights, patent rights, trade secret rights, trademark rights, mask works rights, and all other intellectual and
12 industrial property rights of any sort and all business, contract rights, causes of action, and goodwill in,
13 incorporated or embodied in, used to develop, or related to any of the foregoing.

14 20. Stephens assigned to plaintiff his and his affiliates' retained individual, TGS and X-Blade rights,
15 titles and interests (choate or inchoate) in (i) Patent 2 (ii) all precursors, portions and work in progress with
16 respect thereto and all inventions, works of authorship, mask works, technology, information, know-how,
17 materials and tools relating thereto or to the development, support or maintenance thereof and (iii) all
18 copyrights, patent rights, trade secret rights, trademark rights, mask works rights, and all other intellectual and
19 industrial property rights of any sort and all business, contract rights, causes of action, and goodwill in,
20 incorporated or embodied in, used to develop, or related to any of the foregoing.

21 21. Stephens assigned to plaintiff his and his affiliates' retained individual, TGS and X-Blade rights,
22 titles and interests (choate or inchoate) in (i) Patent 3 (ii) all precursors, portions and work in progress with
23 respect thereto and all inventions, works of authorship, mask works, technology, information, know-how,
24 materials and tools relating thereto or to the development, support or maintenance thereof and (iii) all
25 copyrights, patent rights, trade secret rights, trademark rights, mask works rights, and all other intellectual and
26 industrial property rights of any sort and all business, contract rights, causes of action, and goodwill in,
27 incorporated or embodied in, used to develop, or related to any of the foregoing.

28

LAW OFFICES OF
SCOTT D. JOHANSEN
CALIFORNIA OFFICE
300 WESTLAND AVENUE, SUITE 1000
SAN ANTONIO, CALIFORNIA 78204
TELEPHONE: (214) 222-1100
FAX: (214) 222-1101
WWW.SDJOHANSEN.COM

1 22. The retained and acquired rights, titles and interests referred to in paragraphs 19, 20 and 21 above
2 are collectively referred to herein as the “Inventor’s Rights.”

3 23. Plaintiff is informed and believes that on or before January 31, 2010 Stephens discovered that
4 beginning in or about 2007 or 2008 Else, among others, orchestrated a series of transactions and entity
5 formations and attempted through concealment, misrepresentations and/or false pretenses to disproportionately
6 decrease Stephens’ 50% ownership interest in TGS, the Inventor’s Rights and the TGS Stephens Contributions
7 while, at the same time, disproportionately increase Stephens’ 50% ownership interest in TGS, the Inventor’s
8 Rights, and the TGS Stephens Contribution. Plaintiff is informed and believes that the aforementioned series of
9 transactions includes, but is not limited to, the deployment of defective and substandard product manufactured
10 using certain of the Inventor’s Rights and the fraudulent solicitation of investor funds and debt to dilute the
11 agreed-upon 50/50 respective ownership interests of Stephens and Else in TGS and which acts place at risk
12 Stephens’ proprietary and property rights in and to TGS, the Inventor’s Rights, and the TGS Stephens and/or
13 Else Contributions.

14 24. Plaintiff is informed and believes that between on or before January 31, 2010 Stephens discovered
15 that beginning in or about 2007 or 2008 Else, among others, orchestrated a series of transactions and entity
16 formations and attempted through concealment, misrepresentations and/or false pretenses to disproportionately
17 decrease Stephens’ 50% ownership interest in X-Blade, the Inventor’s Rights and the X-Blade Stephens
18 Contributions while, at the same time, disproportionately increase Stephens’ 50% ownership interest in X-
19 Blade, the Inventor’s Rights, and the X-Blade Stephens Contribution. Plaintiff is informed and believes that the
20 aforementioned series of transactions includes, but is not limited to, the deployment of defective and
21 substandard product manufactured using certain of the Inventor’s Rights and the fraudulent solicitation of
22 investor funds and debt to dilute the agreed-upon 50/50 respective ownership interests of Stephens and Else in
23 X-Blade and which acts place at risk Stephens’ proprietary and property rights in and to X-Blade, the Inventor’s
24 Rights, and the X-Blade Stephens and/or Else Contributions.

25 25. Plaintiff is informed and believes that one or more of the entities formed by Else after the formation
26 of TGS and X-Blade and through Else’s aforementioned acts and fraudulent solicitation of outside investor
27 funds (hereinafter, “NewCo”) wrongfully claims that Stephens’ relative ownership percentages in TGS and X-
28 Blade equity and certain of the Inventor’s Rights, TGS Stephens and/or Else Contributions and X-Blade

1 Stephens and/or Else Contributions was decreased to less than 10% and Else's relative ownership percentages
2 in TGS and X-Blade equity and certain of the Inventor's Rights, TGS Stephens and/or Else Contributions, and
3 X-Blade Stephens and/or Else Contributions was increased to more than 40%. Rather than the agreed-upon
4 perpetual and static 50/50 percentage split in the equity and certain of the Inventor's Rights ownership (which
5 Stephens and Else agreed to upon the formation of TGS and X-Blade), Stephens discovered that Else attempted
6 to wrongfully, through concealment, misrepresentations and/or false pretenses, manipulate the aforementioned
7 static equity and ownership interests to an approximate and dilutable 80 (Else) and 20 (Stephens) percentage
8 split. Representatives of NewCo admitted after December 5, 2009 that the aforementioned Else/Stephens
9 equity percentage splits were incorrect and not properly calculated or represented by NewCo. True and correct
10 copies of relevant correspondence by and among Stephens, Else and their respective representatives and which
11 correspondence inform in part Stephens' recent discovery of Else's improper schemes and activities are
12 attached hereto as **Exhibit 4** and incorporated herein.

13 **FIRST CLAIM FOR RELIEF**

14 **(DECLARATION OF NON-INFRINGEMENT OF PATENT 1** 15 **AND OWNERSHIP OF INVENOR'S RIGHTS)**

16 26. Plaintiff repeats and incorporates herein by reference the allegations in paragraphs 1-25, inclusive,
17 of this complaint.

18 27. Plaintiff is informed and believes that TGS claims, now and in the past, to be the exclusive owner
19 of all right, title and interest in and to Patent 1 and the Inventor's Rights, including the right to enforce Patent 1
20 and the Inventor's Rights against alleged infringers.

21 28. Plaintiff claims to be an owner of the right, title and interest in and to Patent 1 and the Inventor's
22 Rights, including the right to enforce Patent 1 and the Inventor's Rights against alleged infringers.

23 29. An actual, substantial and continuing justiciable case and controversy exists between plaintiff, on
24 the one hand, and TGS, on the other hand, based on competing claims to Patent 1 and the Inventor's Rights.

25 30. Plaintiff has been injured and damaged by TGS's accusations concerning and claims to Patent 1
26 and the Inventor's Rights.

27
28

1 31. Declaratory relief is appropriate and necessary to establish that plaintiff is an owner of the right,
2 title and interest in and to Patent 1 and the Inventor's Rights, including the right to enforce Patent 1 and the
3 Inventor's Rights against alleged infringers.

4 32. Pursuant to 28 U.S.C. §§ 2201, *et seq.*, and the Declaratory Judgment Act, Tenn. Code Ann. § 29-
5 14-101, *et seq.*, plaintiff requests a declaratory judgment that TGS is not and has not been, now or in the past,
6 the exclusive owner of all right, title and interest in and to Patent 1 and the Inventor's Rights, including the
7 right to enforce Patent 1 and the Inventor's Rights against alleged infringers, and that plaintiff is an owner of
8 the right, title and interest in and to Patent 1 and the Inventor's Rights, including the right to enforce Patent 1
9 and the Inventor's Rights against alleged infringers.

10 33. Accordingly, plaintiff prays for judgment as hereinafter set forth.

11 **SECOND CLAIM FOR RELIEF**

12 **(DECLARATION OF NON-INFRINGEMENT OF PATENT 2**
13 **AND OWNERSHIP OF INVENOR'S RIGHTS)**

14 34. Plaintiff repeats and incorporates herein by reference the allegations in paragraphs 1-25, inclusive,
15 of this complaint.

16 35. Plaintiff is informed and believes that X-Blade claims, now and in the past, to be the exclusive
17 owner of all right, title and interest in and to Patent 2 and the Inventor's Rights, including the right to enforce
18 Patent 2 and the Inventor's Rights against alleged infringers.

19 36. Plaintiff claims to be an owner of the right, title and interest in and to Patent 2 and the Inventor's
20 Rights, including the right to enforce Patent 2 and the Inventor's Rights against alleged infringers.

21 37. An actual, substantial and continuing justiciable case and controversy exists between plaintiff, on
22 the one hand, and X-Blade, on the other hand, based on competing claims to Patent 2 and the Inventor's Rights.

23 38. Plaintiff has been injured and damaged by X-Blade's accusations concerning and claims to Patent 2
24 and the Inventor's Rights.

25 39. Declaratory relief is appropriate and necessary to establish that plaintiff is an owner of the right,
26 title and interest in and to Patent 2 and the Inventor's Rights, including the right to enforce Patent 2 and the
27 Inventor's Rights against alleged infringers.

28

1 40. Pursuant to 28 U.S.C. §§ 2201, *et seq.*, and the Declaratory Judgment Act, Tenn. Code Ann. § 29-
2 14-101, *et seq.*, plaintiff requests a declaratory judgment that X-Blade is not and has not been, now or in the
3 past, the exclusive owner of all right, title and interest in and to Patent 2 and the Inventor's Rights, including the
4 right to enforce Patent 2 and the Inventor's Rights against alleged infringers, and that plaintiff is an owner of
5 the right, title and interest in and to Patent 2 and the Inventor's Rights, including the right to enforce Patent 2
6 and the Inventor's Rights against alleged infringers.

7 41. Accordingly, plaintiff prays for judgment as hereinafter set forth.

8 **THIRD CLAIM FOR RELIEF**

9 **(DECLARATION OF NON-INFRINGEMENT OF PATENT 3**
10 **AND OWNERSHIP OF INVENOR'S RIGHTS)**

11 42. Plaintiff repeats and incorporates herein by reference the allegations in paragraphs 1-25, inclusive,
12 of this complaint.

13 43. Plaintiff is informed and believes that X-Blade claims, now and in the past, to be the exclusive
14 owner of all right, title and interest in and to Patent 3 and the Inventor's Rights, including the right to enforce
15 Patent 3 and the Inventor's Rights against alleged infringers.

16 44. Plaintiff claims to be an owner of the right, title and interest in and to Patent 3 and the Inventor's
17 Rights, including the right to enforce Patent 3 and the Inventor's Rights against alleged infringers.

18 45. An actual, substantial and continuing justiciable case and controversy exists between plaintiff, on
19 the one hand, and X-Blade, on the other hand, based on competing claims to Patent 3 and the Inventor's Rights.

20 46. Plaintiff has been injured and damaged by X-Blade's accusations concerning and claims to Patent 3
21 and the Inventor's Rights.

22 47. Declaratory relief is appropriate and necessary to establish that plaintiff is an owner of the right,
23 title and interest in and to Patent 3 and the Inventor's Rights, including the right to enforce Patent 3 and the
24 Inventor's Rights against alleged infringers.

25 48. Pursuant to 28 U.S.C. §§ 2201, *et seq.*, and the Declaratory Judgment Act, Tenn. Code Ann. § 29-
26 14-101, *et seq.*, plaintiff requests a declaratory judgment that X-Blade is not and has not been, now or in the
27 past, the exclusive owner of all right, title and interest in and to Patent 3 and the Inventor's Rights, including the
28 right to enforce Patent 3 and the Inventor's Rights against alleged infringers, and that plaintiff is an owner of

LAW OFFICES OF
SCOTT D. JOHANSEN
TENSSELO OFFICE
300 N. WASHINGTON ST.
NASHVILLE, TENNESSEE 37203
CALIFORNIA OFFICE
100 N. WASHINGTON ST.
SAN ANTONIO, TEXAS 78204

1 the right, title and interest in and to Patent 3 and the Inventor's Rights, including the right to enforce Patent 3
2 and the Inventor's Rights against alleged infringers.

3 49. Accordingly, plaintiff prays for judgment as hereinafter set forth.

4 **DEMAND FOR JURY TRIAL**

5 Plaintiff hereby requests a jury trial for all issues triable by a jury including, but not limited to, those
6 issues and claims set forth in any complaint or amended complaint or counterclaim herein.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, plaintiff prays for judgment as to each claim for relief as follows:

9 1. Render judgment declaring that plaintiff, and not TGS exclusively, is an owner of the right, title
10 and interest in and to Patent 1 and the Inventor's Rights, including the right to enforce Patent 1 and the
11 Inventor's Rights against alleged infringers, and that by exercising its rights plaintiff is not infringing any valid
12 claim to Patent 1, either directly or indirectly, and either literally or under the doctrine of equivalents;

13 2. Render judgment declaring that plaintiff, and not X-Blade exclusively, is an owner of the right, title
14 and interest in and to Patent 2 and the Inventor's Rights, including the right to enforce Patent 2 and the
15 Inventor's Rights against alleged infringers, and that by exercising its rights plaintiff is not infringing any valid
16 claim to Patent 2, either directly or indirectly, and either literally or under the doctrine of equivalents;

17 3. Render judgment declaring that plaintiff, and not X-Blade exclusively, is an owner of the right, title
18 and interest in and to Patent 3 and the Inventor's Rights, including the right to enforce Patent 3 and the
19 Inventor's Rights against alleged infringers, and that by exercising its rights plaintiff is not infringing any valid
20 claim to Patent 3, either directly or indirectly, and either literally or under the doctrine of equivalents;

21 4. Award plaintiff its fees and costs, including attorney's fees, pursuant to 35 U.S.C. § 285; and

22 5. For such other and further relief as the Court deems just and proper.

LAW OFFICES OF
SCOTT D. JOHANSEN
TENSILE OFFICE
380 N. WASHINGTON ST.
ANN ARBOR, MI 48106
CALIFORNIA OFFICE
300 N. WASHINGTON ST.
SAN ANTONIO, TX 78204

1 DATED: February 10, 2010.

Respectfully submitted,

2 LAW OFFICES OF SCOTT D. JOHANNESSEN

3
4 By:


SCOTT D. JOHANNESSEN (BPR No. 26767)
3200 West End Avenue, Suite 500
Nashville, TN 37203
Telephone: 877.863.5400
Facsimile: 877.863.5401
E-Mail: scott@sdjnet.com
Attorney for Plaintiff,
ETCETERA, LLC

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

LAW OFFICES OF
SCOTT D. JOHANNESSEN
CALIFORNIA OFFICE:
200 WEST END AVENUE, SUITE 500
NASHVILLE, TN 37203
TELEPHONE: 877.863.5400
FACSIMILE: 877.863.5401
E-MAIL: scott@sdjnet.com
TENSILE OFFICE:
3200 WEST END AVENUE, SUITE 500
NASHVILLE, TN 37203
TELEPHONE: 877.863.5400
FACSIMILE: 877.863.5401
E-MAIL: scott@sdjnet.com