

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

	)	
SASO GOLF, INC.	)	
	)	Civil Action No. 08 C 1110
Plaintiff,	)	
	)	Judge Blanche M. Manning
v.	)	
	)	Magistrate Judge Nan R. Nolan
NIKE, INC.,	)	
	)	JURY TRIAL DEMANDED
Defendant.	)	

**AMENDED COMPLAINT**

Plaintiff Saso Golf, Inc. (“Saso Golf”), by its attorneys, complains of defendant Nike, Inc. (“Nike” or “Defendant”) and alleges as follows:

**Parties**

1. Saso Golf is an Illinois corporation with a principal office located in Chicago, Illinois.
2. On information and belief, Defendant Nike is an Oregon corporation with a principal place of business located at One Bowerman Drive, Beaverton, Oregon.

**Jurisdiction and Venue**

3. This action is an action for patent infringement under the laws of the United States, Title 35 of the United States Code, as set forth below.
4. This Court has subject matter jurisdiction over the claims in this action pursuant to 28 U.S.C. §1338(a).
5. Personal jurisdiction and venue are proper in this judicial district pursuant to 28 U.S.C. § 1400 (b) because Defendant resides and does business in this judicial district and because it has committed acts of infringement in this judicial district.

**Count I - Patent Infringement**

6. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 – 5, with the same force and effect as if fully set forth herein.

7. On July 8, 1997, U.S. Patent No. 5,645,495 entitled “GOLF CLUB,” a copy of which is attached as Exhibit A, was duly and legally issued. Saso Golf owns the full right, title and interest in and to U.S. Patent No. 5,645,495.

8. In violation of 35 U.S.C. § 271, Defendant makes, uses, offers to sell, sells and/or imports products that infringe claim 7 of U.S. Patent No. 5,645,495.

9. U.S. Patent No. 5,645,495 was publicly available and on information and belief, Defendant has been fully aware of U.S. Patent No. 5,645,495 since at least February 26, 2006.

10. On information and belief, with full knowledge of U.S. Patent No. 5,645,495, Defendant willfully continues to make, use, offer to sell, sell and/or import products that infringe claim 7 of U.S. Patent No. 5,645,495. Defendant will continue its infringement unless enjoined by this Court.

**Relief Sought**

WHEREFORE, Plaintiff Saso Golf respectfully requests that the Court grant the following relief:

a. A preliminary and permanent injunction preventing infringement by the Defendant of claim 7 of U.S. Patent No. 5,645,495;

b. Damages of lost profits, but in no event less than a reasonable royalty, to the maximum extent permitted by law, for Defendant’s past and current infringement of claim 7 of U.S. Patent No. 5,645,495;

- c. An award of treble damages and attorney's fees by reason of Defendant's willful infringement of claim 7 of U.S. Patent No. 5,645,495;
- d. An award of interest, including prejudgment interest;
- e. An assessment of costs and disbursements of this action; and
- f. Such other and further relief as justice and equity may require.

**Jury Demand**

Plaintiff Saso Golf hereby demands trial by jury.

Respectfully submitted,

SASO GOLF, INC.

Dated: August 5, 2009

/s/Mark K. Suri

By: One of Its Attorneys  
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**CERTIFICATE OF SERVICE**

I, Mark K. Suri, an attorney, hereby certify that a true and correct copy of the foregoing document entitled AMENDED COMPLAINT was electronically filed with the Clerk of the Court for the Northern District of Illinois using the CM/ECF System on August 5, 2009. By operation of the Court's CM/ECF System, notice of this filing will be sent to the following registered filing users of the CM/ECF System, as listed on the Court's Notice of Electronic Filing:

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