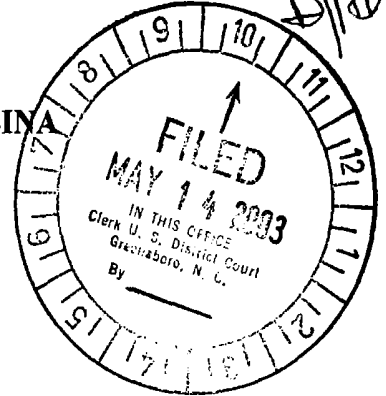


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION



SOFT COLLECTION, S.R.L.,

Plaintiff,

v.

DE CORO, LTD.,

Defendant.

Case No. **1:03CV00418**

**COMPLAINT FOR DECLARATORY JUDGMENT**

Plaintiff, complaining of Defendant, alleges and says:

**PARTIES**

1. Plaintiff Soft Collection, S.r.L. ("Plaintiff" or "Soft Collection") is an Italian company, with a place of business in Greensboro, North Carolina.
2. Defendant De Coro, Ltd. ("Defendant" or "De Coro") is, upon information and belief, a foreign company with principal places of business in High Point, North Carolina and Shenzhen, China.

**JURISDICTION AND VENUE**

3. This is a declaratory judgment action for a declaration of Soft Collection's patent rights in accordance with the Patent Act, 35 U.S.C. § 1, et seq. This Court has jurisdiction of this patent declaratory judgment action pursuant to 28 U.S.C. §§ 1338, 2201 and 2202.

0259226.01  
LIB:

4. This Court has jurisdiction over Defendant in that Defendant has a place of business in this State, does substantial business in this State and resides in this State.

5. Venue is proper in this District pursuant to 28 U.S.C. § 1391 and § 1400.

### **STATEMENT OF FACTS**

6. Defendant claims to own U.S. Patent No. Des. 470,676 S (the “’676 patent”). The ‘676 patent is entitled “Sofa” and is a design patent for a sofa. A copy of the ‘676 patent is attached as Exhibit A.

7. The ‘676 patent issued on February 25, 2003.

8. Soft Collection makes and sells upholstered furniture throughout the United States and the world. Soft Collection specializes in leather upholstered furniture and sells over 300 styles of upholstered sofas.

9. By letter dated April 1, 2003, Defendant’s counsel notified Soft Collection that Defendant considered Soft Collection’s offer for sale or sale of its sofa models “2186” and/or “2236” and/or “2286” to be an infringement of the ‘676 patent and demanded that Soft Collection cease any such allegedly infringing activities. A copy of this letter of April 1, 2003, is attached hereto as Exhibit B.

10. By letter dated May 13, 2003, Soft Collection’s counsel responded to Defendant’s counsel’s April 1, 2003 letter, notifying Defendant that Soft Collection was not infringing the ‘676 patent and that said patent was invalid, especially in light of Soft Collection’s own prior art sofas. A copy of Soft Collection’s counsel’s May 13, 2003 letter is attached hereto as Exhibit C.

### **FIRST CAUSE OF ACTION** **DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF PATENT**

11. Paragraphs 1 through 10 are incorporated herein by reference.

12. This is a claim for a declaratory judgment that Soft Collection does not infringe the '676 patent.

13. The April 1, 2003 letter from Defendant's counsel to Soft Collection, indicate the existence of an actual controversy on the issue of whether Soft Collection is infringing or has infringed the '676 patent.

14. Soft Collection has not infringed and does not infringe any valid patent owned by Defendant, including specifically the '676 patent.

15. Soft Collection is entitled to a declaratory judgment from this Court that neither Soft Collection nor its customers infringe or have infringed the '676 patent.

16. Soft Collection is also entitled to a declaratory judgment from this Court that the '676 patent is invalid and unenforceable.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays this Court for the following relief:

A. That this Court declare that Plaintiff's sofa models, including specifically models 2186, 2236 and 2286, do not infringe any of Defendant's alleged rights in the '676 patent.

B. That this Court declare that the '676 patent is invalid and unenforceable;

C. That Defendant and its agents be enjoined, pending trial, from instituting, prosecuting or threatening any action against Plaintiff, its principals or its customers under the '676 patent;

D. That Defendant and its agents be enjoined from alleging infringement by Plaintiff of the '676 patent;

E. That Plaintiff be awarded the costs and attorneys' fees it incurs in this action; and

F. That Plaintiff be awarded any other relief this Court deems just and proper.

DATE: May 13<sup>th</sup>, 2003.

Respectfully submitted,



Clifford R. Jarrett  
N.C. State Bar No. 18267  
Hearst Tower, 47<sup>th</sup> Floor  
214 North Tryon Street  
Charlotte, North Carolina 28202  
Telephone: (704) 331-7400  
Facsimile: (704) 331-7598  
*Attorneys for Plaintiff*

OF COUNSEL:

KENNEDY COVINGTON LOBDELL & HICKMAN, L.L.P.  
Hearst Tower, 47<sup>th</sup> Floor  
214 North Tryon Street  
Charlotte, NC 28202  
(704) 331-7400



US00D470676S

(12) **United States Design Patent** (10) Patent No.: **US D470,676 S**  
**Ricci** (45) Date of Patent: **\*\* Feb. 25, 2003**

(54) **SOFA**  
 (75) Inventor: **Luca Ricci, Forli (IT)**  
 (73) Assignee: **De Coro Ltd., Fanling (HK)**  
 (\*\*) Term: **14 Years**  
 (21) Appl. No.: **29/160,484**  
 (22) Filed: **May 10, 2002**  
 (51) **LOC (7) Cl.** ..... **06-01**  
 (52) **U.S. Cl.** ..... **D6/381**  
 (58) **Field of Search** ..... **D6/334, 335, 336,**  
**D6/364, 371, 381, 500, 501, 502; 5/12.1;**  
**297/232**

Furniture Today, p. 55, Coaster sofa at right, Apr. 15, 2002.\*  
 Furniture Today, pp. 142-143, De Coro sofa shown, Apr. 15, 2002.\*  
 De Coro Ltd. Sofa Model No. 104, Apr., 1998 at the International Home Furnishing Market in High Point, N.C.  
 De Coro Ltd. Sofa Model No. 108, Apr., 1998 at the International Home Furnishing Market in High Point, N.C.  
 De Coro Ltd. Sofa Model No. 109, Apr., 1998 at the International Home Furnishing Market in High Point, N.C.  
 De Coro Ltd. Sofa Model No. 128, Apr., 1998 at the International Home Furnishing Market in High Point, N.C.  
 De Coro Ltd. Sofa Model No. 138, Apr., 1998 at the International Home Furnishing Market in High Point, N.C.

(List continued on next page.)

Primary Examiner—Gary D. Watson

(74) Attorney, Agent, or Firm—Luce, Forward, Hamilton & Scripps LLP

(56) **References Cited**

**U.S. PATENT DOCUMENTS**

D350,034 S	*	8/1994	Natuzzi et al.	.....	D6/381
D367,180 S	*	2/1996	Natuzzi et al.	.....	D6/381
D373,484 S	*	9/1996	Natuzzi et al.	.....	D6/381
D388,260 S	*	12/1997	Natuzzi et al.	.....	D6/381
D392,809 S	*	3/1998	Natuzzi et al.	.....	D6/381
D399,360 S	*	10/1998	Natuzzi et al.	.....	D6/381
D399,362 S	*	10/1998	Natuzzi et al.	.....	D6/381
D399,363 S	*	10/1998	Natuzzi et al.	.....	D6/381
D399,364 S	*	10/1998	Natuzzi et al.	.....	D6/381
D405,966 S	*	2/1999	Hutton	.....	D6/334
D430,411 S	*	9/2000	Zaidman	.....	D6/334
D430,421 S	*	9/2000	Natuzzi et al.	.....	D6/381
D440,067 S	*	4/2001	Corella	.....	D6/381
D441,979 S	*	5/2001	Watson	.....	D6/381
D448,199 S	*	9/2001	Leon et al.	.....	D6/381

**OTHER PUBLICATIONS**

Natuzzi Model 1795, International Home Furnishings Market, High Point, NC, Mar. 1999.\*

Natuzzi Model 1861, International Home Furnishings Market, High Point, NC, Jul. 1999.\*

Natuzzi Model 1856, International Home Furnishings Market, High Point, NC, Sep. 1999.\*

(57) **CLAIM**

The ornamental design for a sofa, as shown and described.

**DESCRIPTION**

FIG. 1 is a right-front partial perspective view of a sofa showing my new design;

FIG. 2 is a front elevation view of the embodiment of FIG. 1;

FIG. 3 is a top plan view of the embodiment of FIG. 2;

FIG. 4 is a rear elevation view of the embodiment of FIG. 2;

FIG. 5 is a left, side elevation view of the embodiment of FIG. 2, with the right side elevation view being a mirror image thereof;

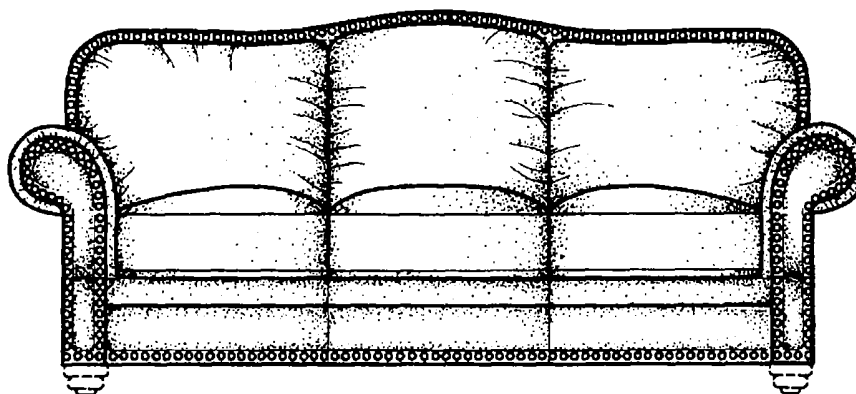
FIG. 6 is a front elevation view of a second embodiment of the sofa depicted in FIG. 2;

FIG. 7 is a back elevation view of the embodiment of FIG. 6; and,

FIG. 8 is a left, side elevation view of the embodiment of FIG. 6, with the right side elevation view being a mirror image thereof.

The broken line disclosure is for illustrative purposes only and forms no part of the claimed design.

1 Claim, 4 Drawing Sheets

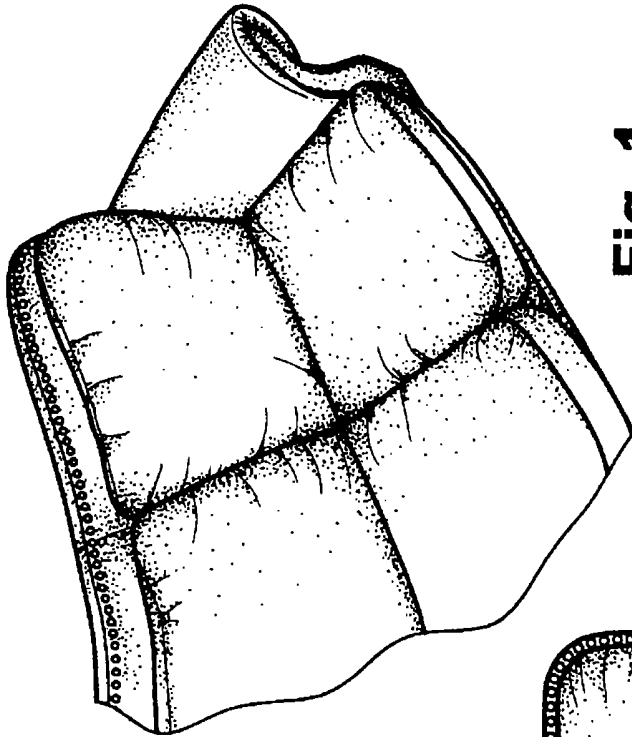


OTHER PUBLICATIONS

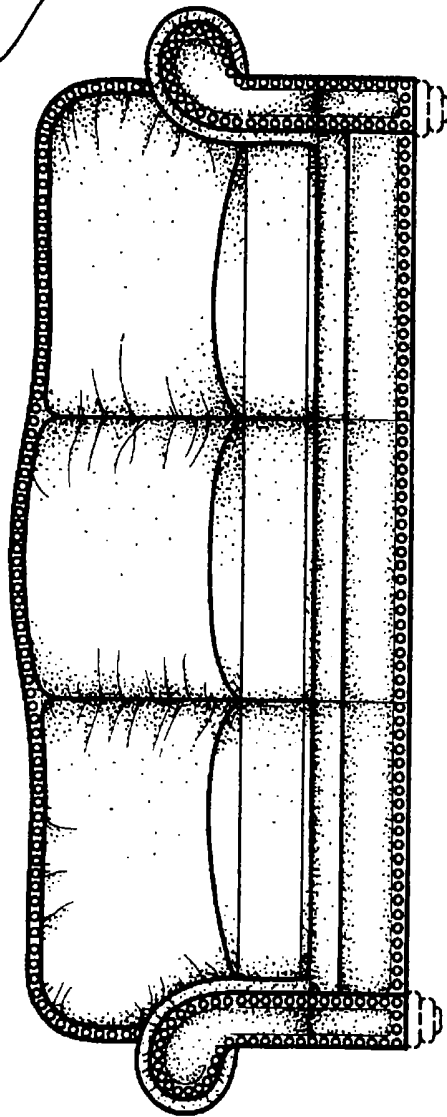
De Coro Ltd. Sofa Model No. 143, Apr., 1998 at the International Home Furnishing Market in High Point, N.C.  
De Coro Ltd. Sofa Model No. 145, Apr., 1998 at the International Home Furnishing Market in High Point, N.C.  
De Coro Ltd. Sofa Model No. 166, Apr., 1998 at the International Home Furnishing Market in High Point, N.C.  
De Coro Ltd. Sofa Model No. 285, Apr., 1999 at the International Home Furnishing Market in High Point, N.C.  
De Coro Ltd. Sofa Model No. 2052, Apr., 2000 at the International Home Furnishing Market in High Point, N.C.

De Coro Ltd. Sofa Model No. 2069, Apr., 2000 at the International Home Furnishing Market in High Point, N.C.  
De Coro Ltd. Sofa Model No. 2081, Apr., 2000 at the International Home Furnishing Market in High Point, N.C.  
De Coro Ltd. Sofa Model No. 2082, Apr., 2000 at the International Home Furnishing Market in High Point, N.C.  
De Coro Ltd. Sofa Model No. 2083, Apr., 2000 at the International Home Furnishing Market in High Point, N.C.  
De Coro Ltd. Sofa Model No. 2086, Apr., 2000 at the International Home Furnishing Market in High Point, N.C.

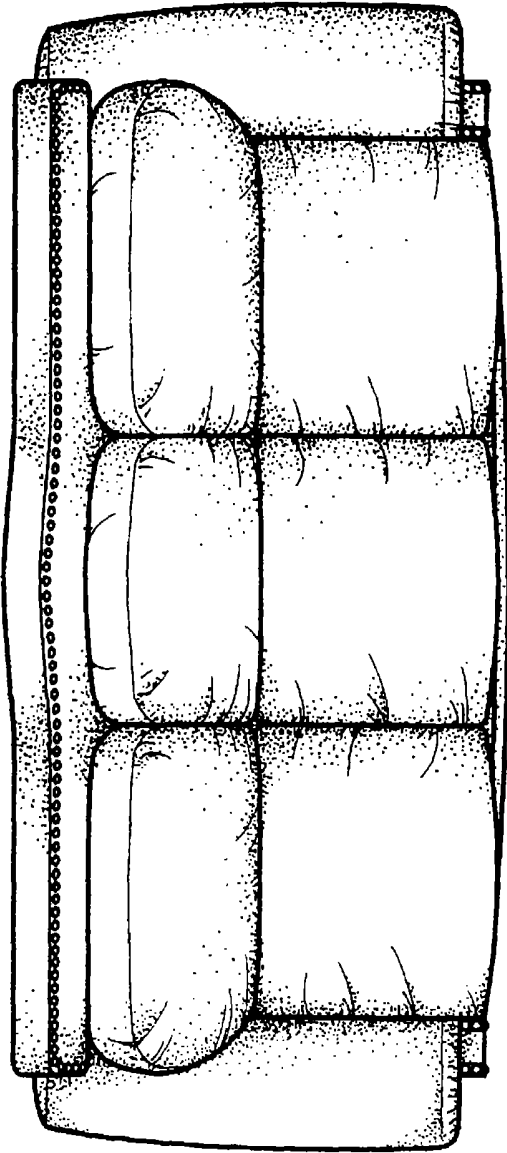
\* cited by examiner



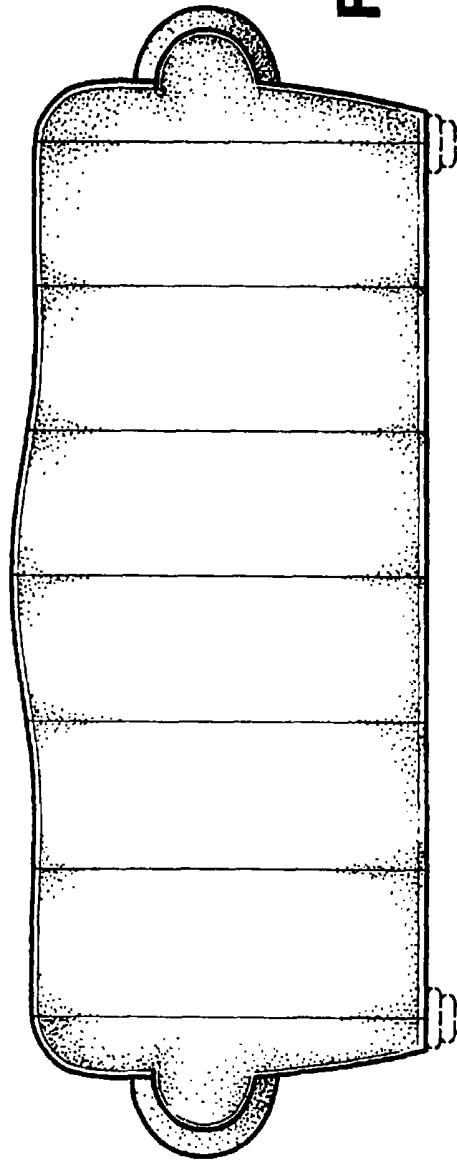
**Fig. 1**



**Fig. 2**

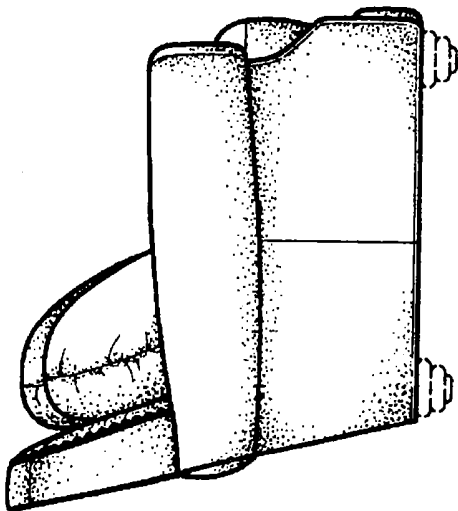


**Fig. 3**

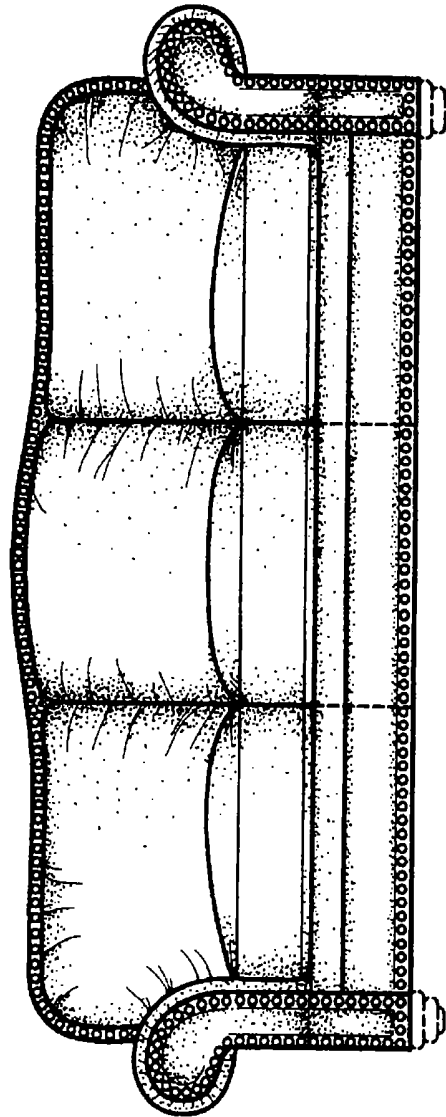


**Fig. 4**

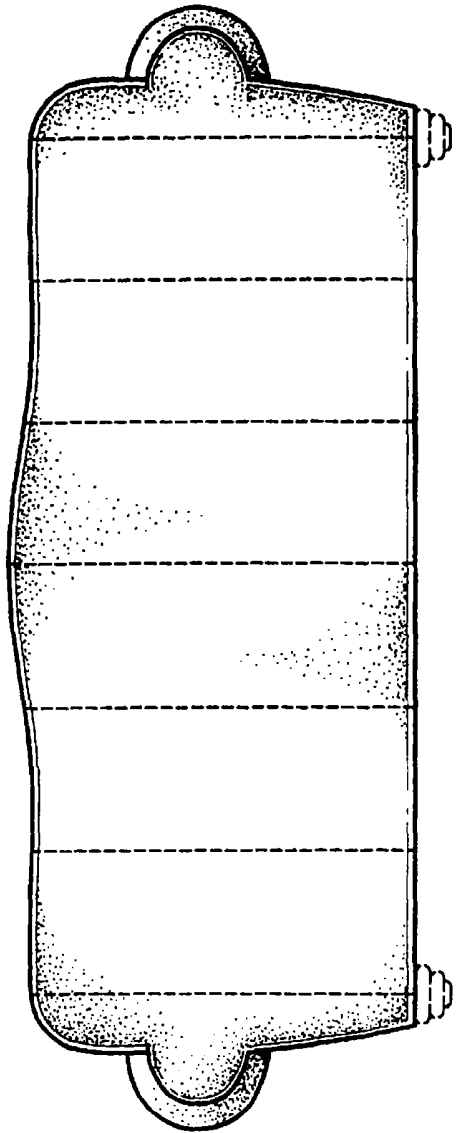




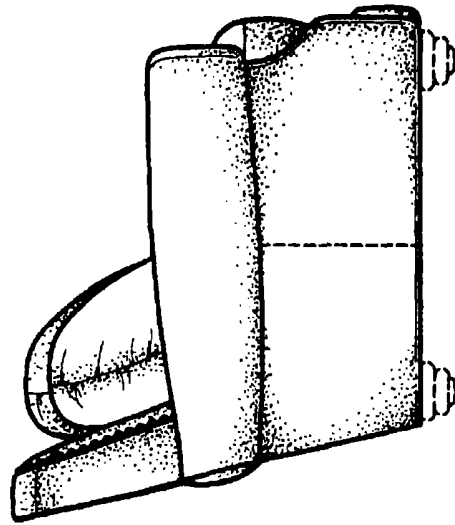
**Fig. 5**



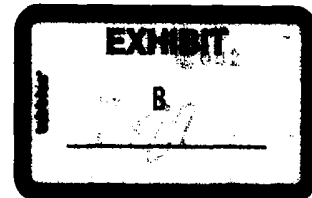
**Fig. 6**



**Fig. 7**



**Fig. 8**



# LUCE FORWARD

ATTORNEYS AT LAW • FOUNDED 1873  
LUCE, FORWARD, HAMILTON & SCRIPPS LLP

PETER R. MARTINEZ, ASSOCIATE  
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DIRECT FAX NUMBER 858.523.4331  
EMAIL ADDRESS PMARTINEZ@LUCE.COM

11988 El Camino Real  
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858.720.6300  
858.720.6306 fax  
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April 1, 2003

## VIA FEDERAL EXPRESS

William May  
Soft Collection S.r.L.  
1931 Freeman Mill Road  
Greensbro, NC 27406

Re: U.S. Design Patent No. D470,676 S  
Soft Collection S.r.L. Sofa Model "2186" and/or "2236" and/or "2286"  
Our File: 30346-116

Dear Mr. May:

We are counsel to DeCoro, Ltd. ("DeCoro"). DeCoro is the owner of United States Letters Patent No. D 470,676 S ("the '676 patent"), a copy of which is enclosed for your reference. By virtue of the grant of the patent, DeCoro has the exclusive right to manufacture, offer for sale, sell, use, import and export the invention protected by said patent in the United States.

It has recently come to our attention that your company, Soft Collection S.r.L. ("Soft Collection"), is selling and offering for sale furniture products covered by this patent, including without limitation sofa models called the "2186" and/or the "2236" and/or the "2286." These product(s) are substantially identical to, and are literally within the scope of the claim of the '676 patent. This activity, whether innocent or intentional, is causing and will continue causing damage to DeCoro unless discontinued immediately.

As you are aware, under the principles of patent infringement, Soft Collection's infringement may not only be enjoined, but also can result in an award of monetary damages. These damages can include DeCoro's lost profits and/or a reasonable royalty, trebling of DeCoro's damages, and an award of DeCoro's attorneys' fees.

As an ongoing business, DeCoro cannot and will not tolerate infringement of its patents or other intellectual property. Therefore, we demand that Soft Collection, and its distributors, dealers, suppliers, etc., immediately cease and desist from these activities and from accepting any orders derived from them.

As you can appreciate, this is a matter of serious concern to DeCoro. We expect that you share our client's desire to resolve this matter expeditiously and without resorting to costly legal

3079

**LUCE FORWARD**

ATTORNEYS AT LAW - FOUNDED 1873  
LUCE, FORWARD, HAMILTON & SCRIPPS LLP

Mr. May

April 1, 2003

Page 2

proceedings. Accordingly, we are requesting that you reply to our request on or before the close of business on April 18, 2003, and also advise us of the steps you plan to take with respect to these demands. Your timely cooperation will go along way toward limiting Soft Collection's exposure in this matter.

This letter is not intended to be a complete recitation of all the facts or law relevant to this matter. All of DeCoro's rights and remedies are reserved.

Very truly yours,

Mitchell P. Brook

Peter R. Martinez

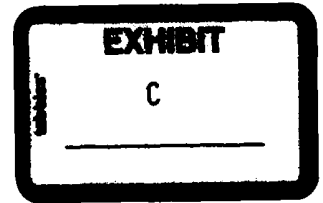
of

LUCE, FORWARD, HAMILTON & SCRIPPS LLP

Cc: Mr. Luca Ricci

Enclosure

1840785



Clifford R. Jarrett  
704.331.7531  
cjarrett@kennedycovington.com

May 13, 2003

**VIA REGULAR MAIL**

Peter R. Martinez, Esq.  
Luce Forward  
11988 El Camino Boulevard  
Suite 200  
San Diego, California 92130

**RE: U.S. Design Patent No. D470,676 S**  
**Soft Collection S.r.L. Sofa Model "2186" and/or "2236" and/or "2286"**  
**Our File No. 020311.007**

Dear Mr. Martinez:

As a follow-up to my April 17, 2003 letter with respect to the above-captioned matter, we have now had a chance to review the file history of your client's patent and evaluate the allegations of infringement contained in your April 1, 2003 letter. Based on this investigation and evaluation, it is our conclusion that U.S. Patent No. D470,676 patent (the "'676 patent") is invalid and not infringed by Soft Collection's sofas.

Soft Collection has been selling leather sofas having designs similar to the accused models for several years. Of particular interest to this dispute are two of Soft Collection's lines - model nos. 5800 and 2064. We are enclosing color photographs of these two models along with invoices that establish these sofas were sold in the United States well in advance of May 10, 2001. Based on the prosecution history of the '676 patent, Soft Collection's prior art sofas, in particular its models 5800 and 2064, are more relevant prior art than the Coaster furniture line that was the basis of the examiner's final rejection of your client's application. It is Soft Collection's position that had the examiner known of the Soft Collection prior art during the examination of your client's application, the '676 patent never would have issued. For many of the same reasons the examiner stated in his office actions, as well as the arguments your client made before the examiner to overcome these rejections, Soft Collection is confident that, if litigated, the '676 patent will be found invalid or not infringed by Soft Collection's sofas.

Because of these allegations of infringement, Soft Collection has filed a declaratory judgment action seeking to have a court declare the '676 patent invalid or not infringed. A courtesy copy of the Complaint is enclosed for your review. We are hopeful that after you have had a chance to review the enclosed prior art, especially in light of the file history of the '676

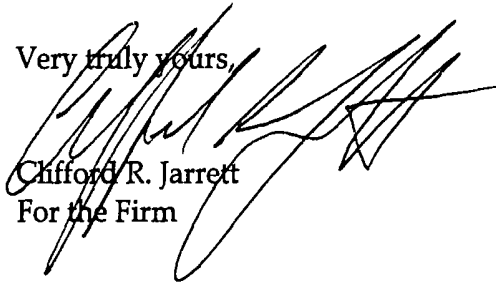
Peter R. Martinez, Esq.  
May 13, 2003  
Page 2

patent prosecuted by your firm, you will share our evaluation concerning the '676 patent and your client will make the prudent decision not to put the '676 patent at risk.

Should you disagree with our evaluation and wish to proceed with the litigation, please let me know if you will accept service on behalf of De Coro of the Summons and Complaint and I will forward to you an Acceptance of Service form. If you are not in a position to accept service, please let me know and we will otherwise obtain service on De Coro.

In the meantime, should you have any questions or comments, please feel free to call me at the above number.

Very truly yours,

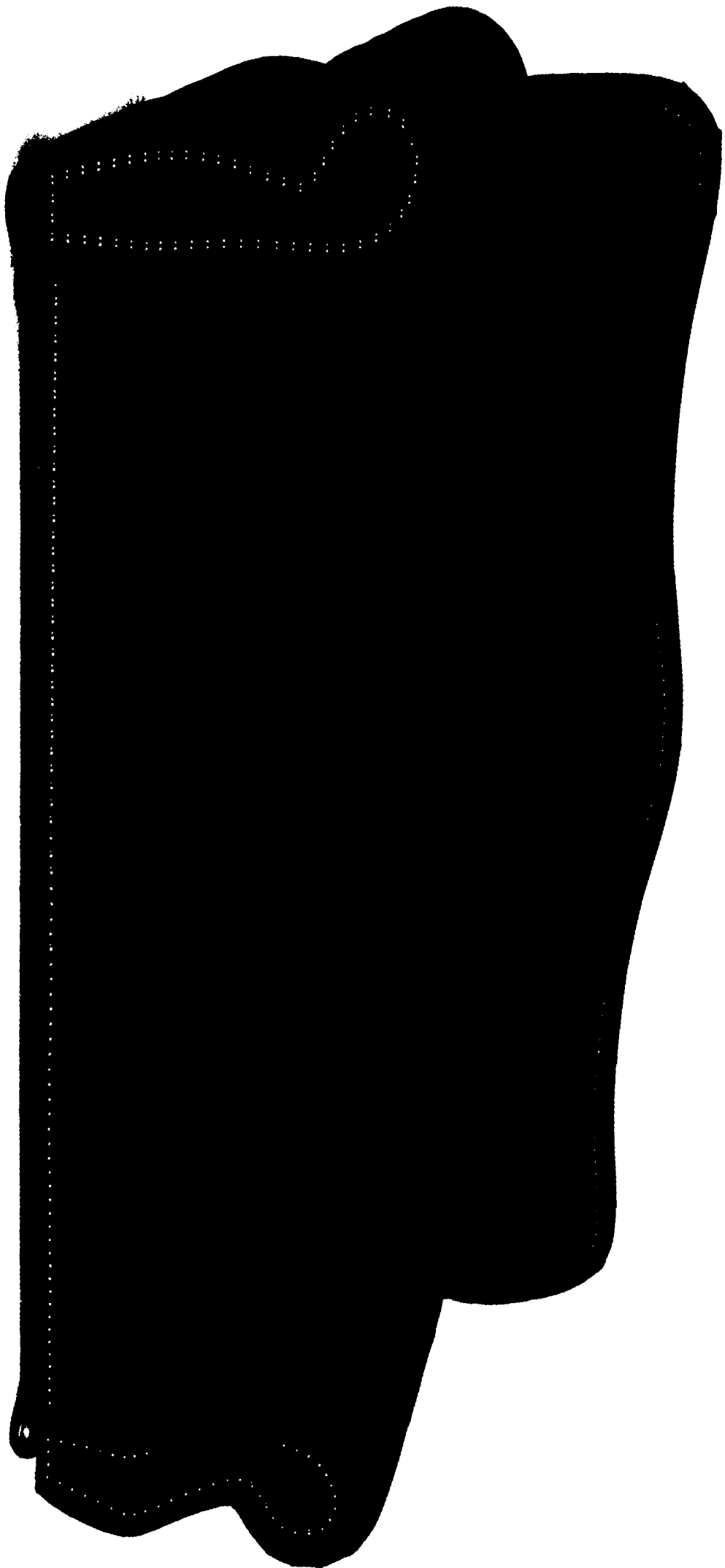
A handwritten signature in black ink, appearing to read 'Clifford R. Jarrett', is written over the typed name and title.

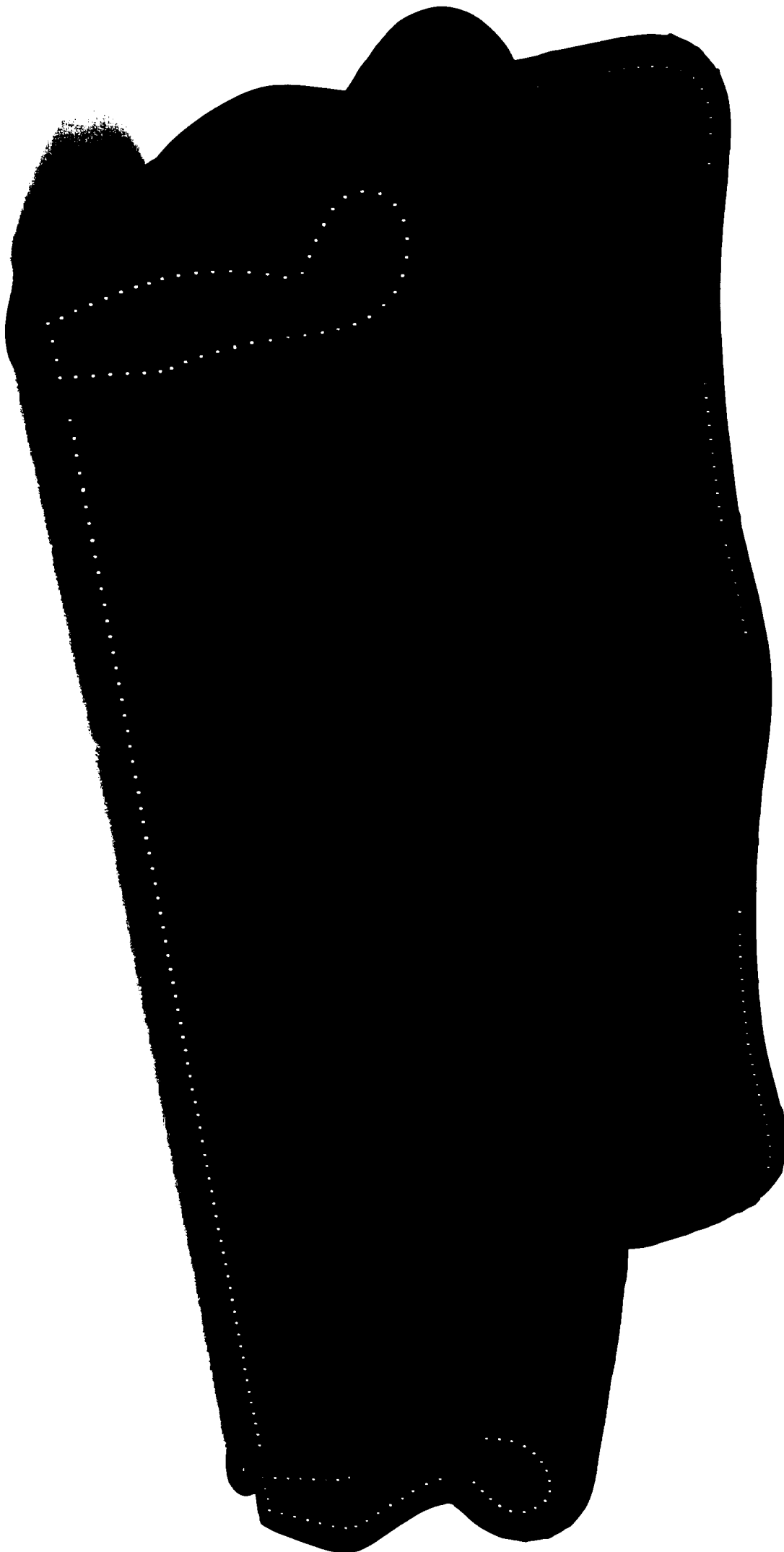
Clifford R. Jarrett  
For the Firm

CRJ/sys

Enclosures

cc: Mr. William Guy Ray (w/o encls.)







19

SOFT LINE GLOBAL SERVICE S.p.A.  
 S.P. Bari/Modugno Km. 3 - 70028 MZ  
 Tel. 080.535.28.91 pbx. Fax 080.535.28.92

SOUTHERN UNIVOLUTERY S.r.l.  
 S.P. Bari/Modugno Km. 3 - 70028 MZ  
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SOFT LINE S.p.A.  
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 Tel. 080.535.28.91 pbx. Fax 080.535.47.51

KANES FURNITURE CORPORATION

KANES FURNITURE CORPORATION  
 5700 70TH AVENUE NORTH  
 33781 PINELLAS PARK FL

5700 70TH AVE NORTH  
 33781 PINELLAS PARK ( ) FL  
 ENTRY TO BE MADE UNDER SOFT COLLECTION CONTINUOUS BOND 109812640  
 P.O.E. : MIAMI

C.F. CHECK:

BANCA NAZIONALE DELL'AGRICOLTURA  
 17 STATE STREET, 21ST FLOOR  
 NEW YORK, NY 10004  
 ABA 021000089 A/C 29540010010

3203/ 1030001AR 05/12/2000  
 DELIVERY TERMS : TERMINI DI CONSEGNA  
 PAYMENT TERMS  
 CONDIZIONI DI PAGAMENTO  
 LANDED P.O.E. DUTY PAID 30 DAYS R.O.G.

AGENT : AGENTE

FREIGHT FORWARDER

SPECIAZIONIERE

INTERGLOBO MORRA S.R.L.

INVOICE DATA 03058/2000

INVOICE DATE 05/12/2000

DESCRIPTION	COLOR	QTY	PRICE FCO FACTORY	PRICE C.I.F. DUTY PAID	TOTAL FCO FACTORY	TOTAL C.I.F. DUTY PAID
Rif. Bolla num. 3203 del 05/12/2000						
1030001AR STYLE 2064 SOFA MESSINA/SPLIT	RED KELATO 850	18		585,00		10530,00
1030001AR STYLE 2064 LOVE MESSINA/SPLIT	RED KELATO 850	15		560,00		8400,00
1030001AR STYLE 2064 CHAIR MESSINA/SPLIT	RED KELATO 850	15		460,00		6900,00
1030001AR STYLE 2064 OTTOMAN MESSINA/SPLIT	RED KELATO 850	15		225,00		3375,00
**NR.105						
DISCOUNT						300,00
TOTAL PACKAGES:		63				
TOTAL G.W.KOSS:		2240				
TOTAL N.W.KOSS:		2175				

ENTRY TO BE MADE UNDER SOFT COLLECTION CONTINUOUS BOND 109812640

CONTAINERS: HIGH CUBE -SEAU 835859.2 VESSEL: SEALAND MOTIVATOR - MAERSK DEP. DATE: 8/12/2000

BEAL: 21102 NON IMPONIBILE IVA ART.8 LETTERA A USD 0.C.:005694

DESCRIZIONE I.V.A.	N. IVA	IMPONIBILE I.V.A.	IMPOSTA	C.I.F./DUTY/TAXES C.I.F. DAZI	TOTAL AMOUNT F.O.B. TOT. FCO FABBR.	TOTAL C.I.F. NET P&L LANDED
						28905,00

Dichiaro sotto la mia personale responsabilità ed in particolare agli effetti delle vigenti disposizioni legislative che il prezzo indicato nella presente fattura è vero e che pertanto nessun'altra compensazione in qualsiasi forma è così stabilita, modalità ed a favore e a carico dell'impresa, all'atto dell'importazione. All'operazione per cui è stata emessa la fattura.

8

SHIP TO  
 LEVIN FURNITURE  
 301 FITZ HENRY ROAD  
 15479 SMITHTON ( ) PA  
 ENTRY TO BE MADE UNDER SOFT COLLECTION CONTINUOUS BOND 109812040  
 F.O.E. : NEW YORK

INVOICE TO SPETTLE / MESSRS  
 LEVIN FURNITURE  
 301 FITZ HENRY ROAD  
 15479 SMITHTON

C.F.  
 CHECK:  
 BANCHE ITALIANE  
 CREDITO ITALIANO, NY  
 375 PARK AVENUE  
 NEW YORK N.Y. 10152  
 ABA 021 000 089 A/C 918-17859

2774/ 1103906FBRC 20/12/1999  
 DELIVERY TERMS "TERMINI D. CONSEGNA" PAYMENT TERMS "CONDIZIONI DI PAGAMENTO" AGENT AGENTE FREIGHT FORWARDER SPECIZIONIERE INVOICE FATTURA INVOICE DATE DATA FATTURA  
 LANDED TO THE WAREHOUSE 30 DAYS R.O.G. ADAM LEIFER INTERGLOBO HORRA S.R.L. 002620 20/12/1999

PURCHASE ORDER NUMBER DESCRIPTION VESSEL C.I.F. INC. TAX & DUTY PAID NET F.O. FABBR. NET C.I.F. QUANT. & VALUE TOT. F.O. FABBR. TOT. C.I.F. NET PAID

PURCHASE ORDER NUMBER	DESCRIPTION	VESSEL	C.I.F.	INC. TAX & DUTY PAID	NET F.O. FABBR.	NET C.I.F.	QUANT. & VALUE	TOT. F.O. FABBR.	TOT. C.I.F. NET PAID
Rif. Bolla num. 2774 del 20/12/1999									
1103906FBRC	STYLE 5800 SOFA PALERMO/SPLIT	BAROLO 9026	18			750,00			13500,00
1103906FBRC	STYLE 5800 LOVE PALERMO/SPLIT	BAROLO 9026	14			725,00			10150,00
1103906FBRC	STYLE 5500 CHAIR PALERMO/SPLIT	BAROLO 9026	17			625,00			10625,00
1103906FBRC	STYLE 5800 OTTOMAN PALERMO/SPLIT	BAROLO 9026	15			240,00			3600,00
	**NR.105								
	TOTAL PACKAGES:		64						
	TOTAL G.W.KOSS:		2260						
	TOTAL N.W.KOSS:		2195						

SOUTHERN UNIVOLTERRY S.r.l.  
 S.p.A. S.S. Km. 4.700 - 70022 ALTAMURA (BA)  
 Tel. 080.314.04.08 - Fax 080.314.03.99

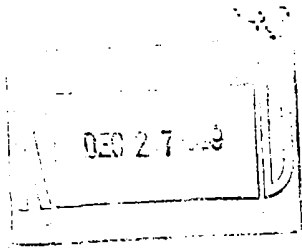
SOFT COLLECTION S.r.l.  
 S.p.A. S.S. Km. 3 - 70026 MODUGNO (BA)  
 Tel. 080.532.48.07 - Fax 080.532.09.22

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 S.P. Bankedotto Km. 3 - 70026 MODUGNO (BA)  
 Tel. 080.535.26.91 - Fax 080.535.47.51

SOFT LINE S.p.A.  
 S.P. Bankedotto Km. 3 - 70026 MODUGNO (BA)  
 Tel. 080.535.26.91 - Fax 080.535.47.51



ENTRY TO BE MADE UNDER SOFT COLLECTION CONTINUOUS BOND 109812640

CONTAINERS: HIGH CUBE -TEXU 539016.9 VESSEL: FEI HE - COSCO DEP. DATE: 27/12/1999  
 SEAL: 606685 NON IMPONIBILE IVA ART.8 LETTERA A USD O.C.: 994512  
 DESCRIZIONE I.V.A. IMPOSTA C.I.F./DUTY/TAXES C.I.F. DAZI

TOTAL AMOUNT F.O.B. TOT. F.O. FABBR. TOTAL C.I.F. NET PAID  
 37875,00

Dichiaro sotto la mia e personale responsabilità ed in particolare agli effetti delle vigenti disposizioni valutarie che il prezzo indicato nella presente fattura è vero e reale e che pertanto nessun'altra corrispondenza in qualsiasi forma e con qualsiasi modalità va a favore o a carico dell'impresa da me rappresentata in relazione alle operazioni per cui è stata emessa la fattura stessa.