

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
155030 CANADA, INC. (d/b/a FAMILY)	
GAMES))	
4323 Av. Girouard,)	
Montreal, Quebec,)	
Canada H4A3E5,)	
)	Civil Action No.: 1:04 cv 01972 (JR)
Plaintiff,)	
)	
v.)	
)	
MAGNET 4U CO., LTD.,)	
388, Shinhon 3-Li, Opo-Myon,)	
Kwangju-Gun)	
Kyonggi-do, Korea,)	
)	
Defendant.)	
_____)	

FIRST AMENDED COMPLAINT

Plaintiff, 155030 CANADA, INC. (d/b/a FAMILY GAMES) (collectively “Family Games”), for its complaint against Defendant, MAGNET 4U CO., LTD. (“Magnet 4U”) alleges as follows:

THE PARTIES

1. Plaintiff, 155030 CANADA, INC. (d/b/a FAMILY GAMES) is a corporation organized and existing under the laws of Canada with its principal place of business at Montreal, Quebec, Canada.

2. On information and belief, Defendant MAGNET 4U CO., LTD. is a corporation organized and existing under the laws of Korea with a principal place of business at Kwangju-City, Kyonggi-do, Korea.

JURISDICTION AND VENUE

3. This Court has jurisdiction since the matter in controversy raises a federal question under the Patent Laws of the United States (35 U.S.C. § 271 et seq.). The specific remedy sought herein is based on the laws authorizing actions for Declaratory Judgment in the Courts of the United States (28 U.S.C. §§ 2201, 2202). This Court has personal jurisdiction over the defendant pursuant to 35 U.S.C. § 293. Venue is proper in this District pursuant to 28 U.S.C. § 1391(d).

STATEMENT OF MATERIAL FACTS

4. On information and belief, Magnet 4U is the owner by assignment of U.S. Patent No. 6,517,075, entitled “Dart Board With Magnetic Rubber Sheet” (“the ‘075 patent”). A copy of the ‘075 patent is attached hereto as Exhibit A.

5. Magnet 4U, through legal counsel, has alleged that Family Games and its customers infringe the ‘075 patent and has issued threats of litigation under its purported patent rights against Family Games and Family Games’ customers.

6. Magnet 4U, directly and through legal counsel, and by way of letters to Family Games and Family Games’ customers dated September 4, 2003, (attached hereto as Exhibits B, C, and D) has identified magnetic dart boards distributed by Family Games as infringing the ‘075 patent.

7. Specifically, by way of the aforementioned letters dated September 4, 2003, to Family Games and Family Games’ customers, Magnet 4U, through legal counsel, has asserted that Family Games and Family Games’ customers infringe the ‘075 patent, and has requested that Family Games and Family Games’ customers cease and desist their allegedly infringing activities.

8. More specifically, by way of the aforementioned letters dated September 4, 2003, to Family Games and Family Games' customers, Magnet 4U, through legal counsel, has asserted that it will "take any and all legal remedies against your company including without limitation an action to prevent Your Products [sic] from being imported into the United States and recover full amounts [sic] of damages permitted under applicable laws. Please keep in mind that any willful violation of our client's patent rights may subject your company to treble damages."

9. Magnet 4U continues to assert that Family Games' magnetic dart boards infringe the '075 patent. Specifically, in an email dated October 8, 2004 from Magnet 4U to Brookstone, a Family Games customer, Magnet 4U has asserted that Brookstone's magnetic dart board, identified as SKU#336149 and supplied to Brookstone by Family Games, "definitely violated" the '075 patent. A copy of the email is attached hereto as Exhibit E.

10. Family Games is continuing to market and sell its magnetic dart board product in the United States.

11. None of Family Games' magnetic dart boards infringe any claim of the '075 patent, and Brookstone's SKU#336149 magnetic dart board does not infringe any claim of the '075 patent.

12. Family Games has been selling its magnetic dart board in the United States since at least as early as March 31, 2000.

13. The earliest filing date of the '075 patent is August 17, 2001.

14. If the '075 patent is construed to read on Family Games' magnetic dart board, then the '075 patent is invalid for failure to comply with one or more of the requirements of 35 U.S.C. §§ 102 and/or 103.

15. By reason of Magnet 4U's continuing allegations of infringement of the '075 patent, Family Games has a reasonable apprehension that it will be sued for infringement of the '075 patent by Magnet 4U based upon its continuing marketing and sales of its magnetic dart board product in the United States. Hence, an immediate, real, and justiciable controversy exists between the parties to this action as to non-infringement and/or invalidity of the claims of the '075 patent.

16. This existing case of actual controversy between Family Games and Defendant Magnet 4U entitles Family Games to relief under the Declaratory Judgment Act, 28 U.S.C. §§ 2201-2202.

COUNT I – DECLARATION OF NON-INFRINGEMENT

17. Family Games repeats and re-alleges the facts set forth in Paragraphs 1-16 above.

18. As a consequence of the threatening allegations made by Magnet 4U, and the lack of infringement of any claim of the '075 patent by Family Games, Family Games has been damaged by the acts of Magnet 4U in an amount which is unknown and which, at the present time, cannot be ascertained.

19. Unless enjoined by this Court, Defendant Magnet 4U will continue to falsely assert that Family Games, Family Games' products, and Family Games' customers infringe the claims of the '075 patent, to Family Games' continuing and irreparable injury for which it has no adequate remedy at law.

COUNT II – DECLARATION OF INVALIDITY

20. Family Games repeats and re-alleges the facts set forth in Paragraphs 1-16 above.

21. As discussed above, Family Games has been selling its magnetic dart board in the United States since at least as early as March 31, 2000, more than one year prior to the filing of

the application for the '075 patent. Thus, to the extent that the '075 patent covers Family Games' magnetic dart board, the '075 patent is invalid for failure to comply with one or more provisions of Title 35, United States Code.

22. A reasonable opportunity for further investigation or discovery is likely to provide additional evidentiary support that the claims in the '075 patent are invalid for failure to comply with one or more of the provisions of Title 35, United States Code.

WHEREFORE, as relief, Family Games prays:

A. That this Court decree and declare by judgment that Family Games does not infringe any claim of the '075 patent.

B. That this Court decree and declare by judgment that Family Games' magnetic dart boards do not infringe any claim of the '075 patent.

C. That this Court decree and declare by judgment that Family Games' customers do not infringe any claim of the '075 patent.

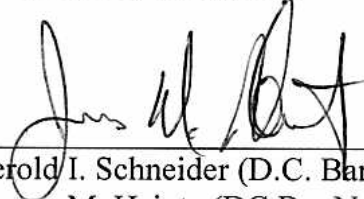
D. That this Court decree and declare by judgment that the '075 patent is invalid.

E. That this case be declared exceptional under 35 U.S.C. § 285 and Family Games be awarded the costs of its defense, including attorneys' fees.

F. That Family Games be awarded such other and further relief as this Court may deem just and appropriate.

Dated: June 22, 2005

Respectfully submitted.

A handwritten signature in black ink, appearing to read "Jerold I. Schneider", written over a horizontal line.

Jerold I. Schneider (D.C. Bar o. 417686)

James M. Heintz (DC Bar No. 456410)

DLA PIPER RUDNICK GRAY CARY US LLP

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(202) 861-3900

Attorneys for the Plaintiff

155030 Canada, Inc. (d/b/a Family Games)

EXHIBIT A



US006517075B1

(12) **United States Patent**
Yoon

(10) **Patent No.:** US 6,517,075 B1
 (45) **Date of Patent:** Feb. 11, 2003

(54) **DARTBOARD WITH MAGNETIC RUBBER SHEET**

5,613,684 A * 3/1997 Gittens et al. 273/348.3
 5,967,520 A * 10/1999 Chen 273/348.3

(75) **Inventor:** Bong-Seok Yoon, Kyonggi-Do (KR)

(73) **Assignee:** Magnet 4U Co., Ltd., Kyonggi-do (KR)

(*) **Notice:** Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

(21) **Appl. No.:** 09/931,234

(22) **Filed:** Aug. 17, 2001

(51) **Int. Cl.⁷** F41J 3/00

(52) **U.S. Cl.** 273/348.3

(58) **Field of Search** 273/348.3, 119 A, 273/126 A, 239; 473/FOR 209

(56) **References Cited**

U.S. PATENT DOCUMENTS

2,562,089 A * 7/1951 Fishlove 273/348.3
 2,645,491 A * 7/1953 Volman 273/348.3
 3,147,976 A * 9/1964 Millar 273/348.3
 3,170,693 A * 2/1965 Felsner 273/348.3
 3,508,752 A * 4/1970 Lemon 273/348.3
 5,005,841 A * 4/1991 Klick 273/239

FOREIGN PATENT DOCUMENTS

CA 2037674 * 6/1992 473/FOR 209

* cited by examiner

Primary Examiner—Mark S. Graham

(74) *Attorney, Agent, or Firm*—Bacon & Thomas

(57) **ABSTRACT**

Disclosed herein is a dartboard with a magnetic rubber sheet. The dartboard includes a target board, a holding pole and two closure members. The target board includes a magnetic rubber sheet having a rectangular shape and containing iron, the two sheets of cotton flannel being attached to both surfaces of the magnetic rubber sheet and having raisings on their outer surfaces, and an upper fitted piece attached to the upper end of the front surface of one of said two sheets of flannel. The holding pole includes a hollow for holding one end of the target board, a slit formed along the entire length of the holding pole to pass through the inner and outer circumferential surfaces of the holding pole, and holes for allowing a hanging string to be fastened to the holding pole. The two closure members are each provided with an insert-recess into which one end of the holding pole is inserted.

4 Claims, 5 Drawing Sheets

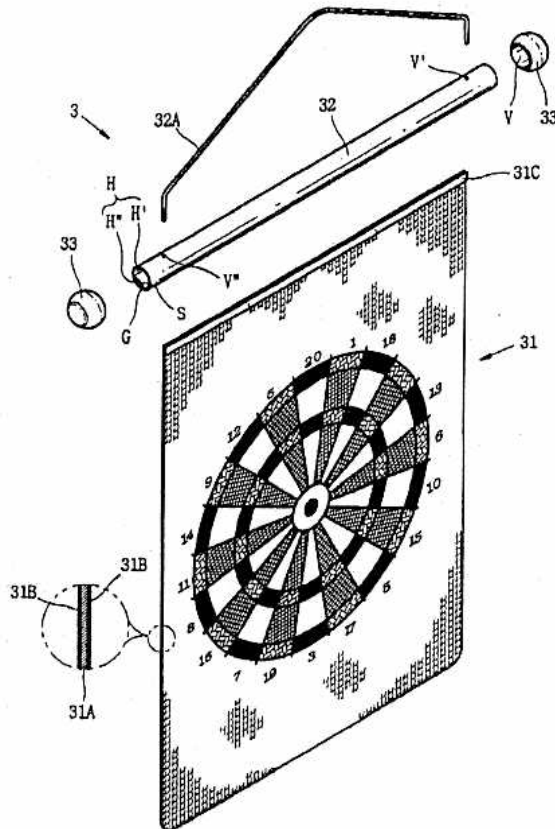


Fig. 1
(PRIOR ART)

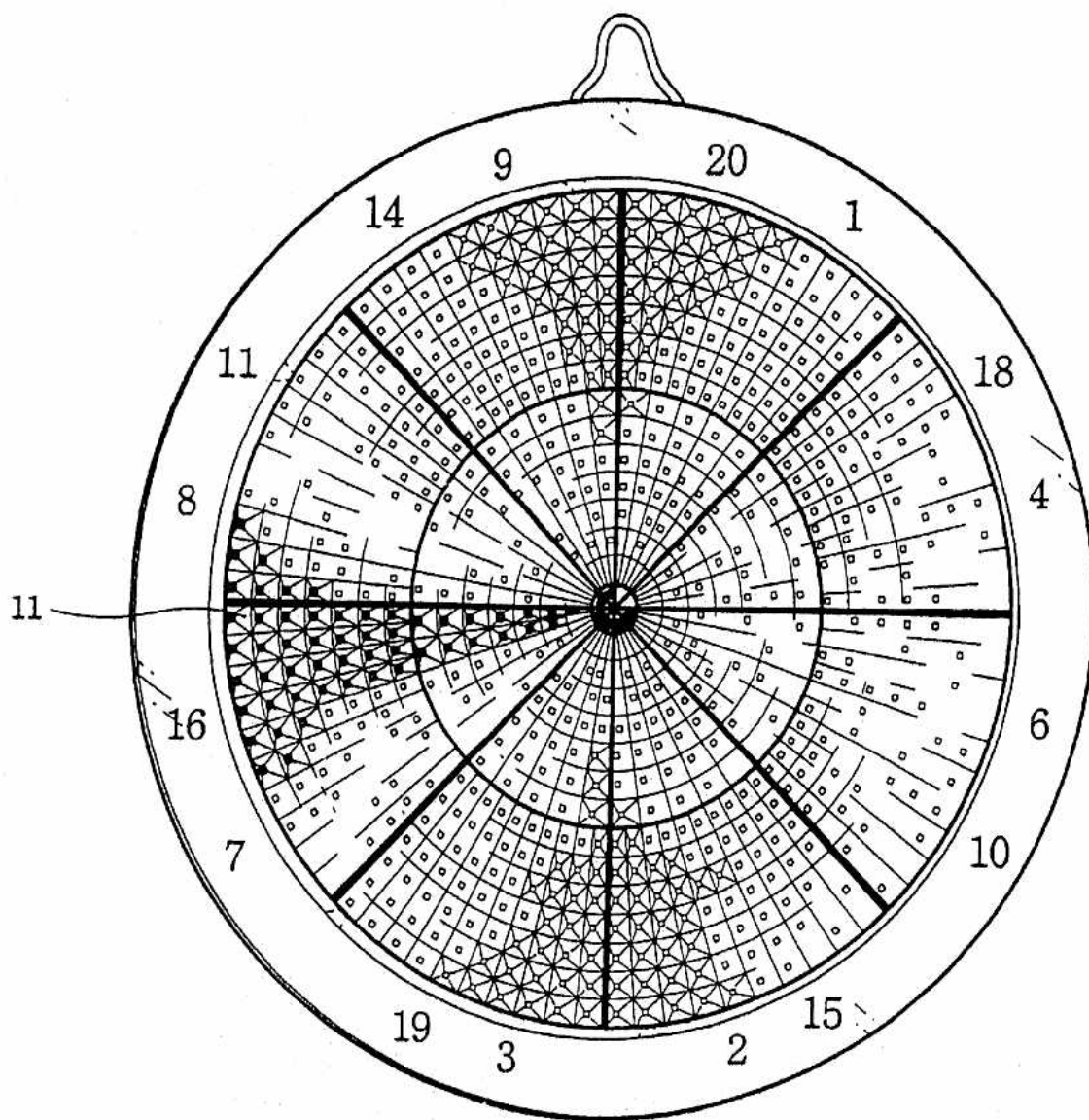


Fig. 2a
(PRIOR ART)

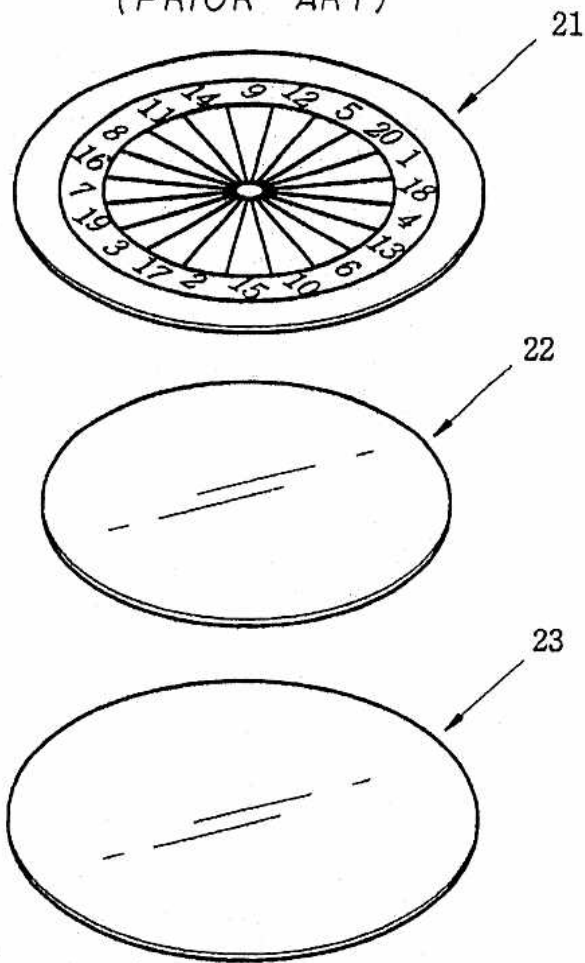


Fig. 2b
(PRIOR ART)

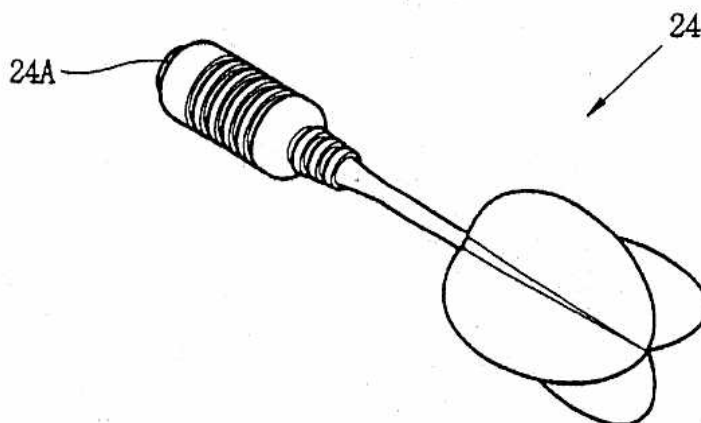


Fig. 3a

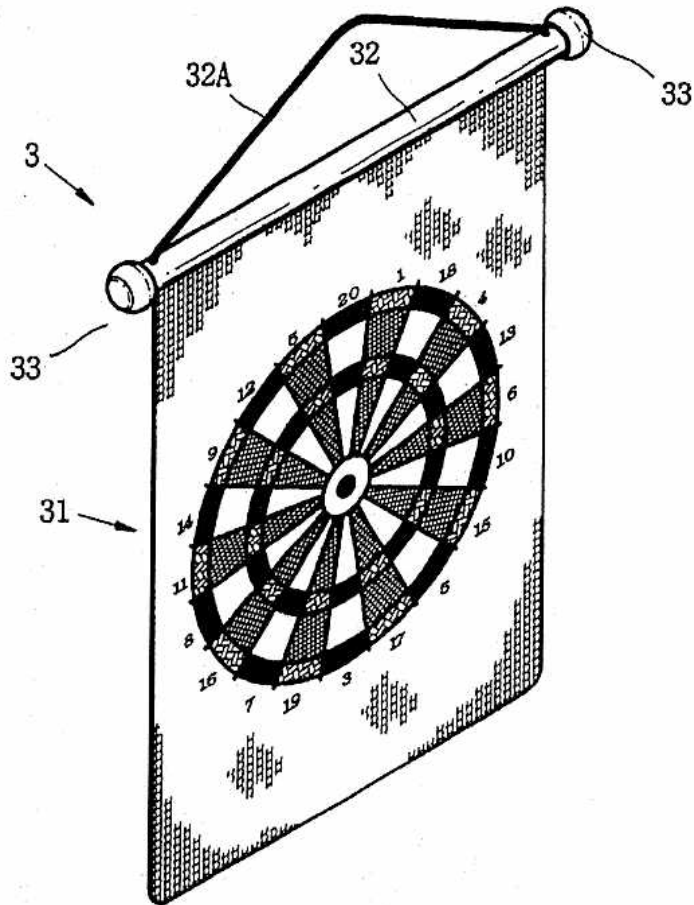


Fig. 3b

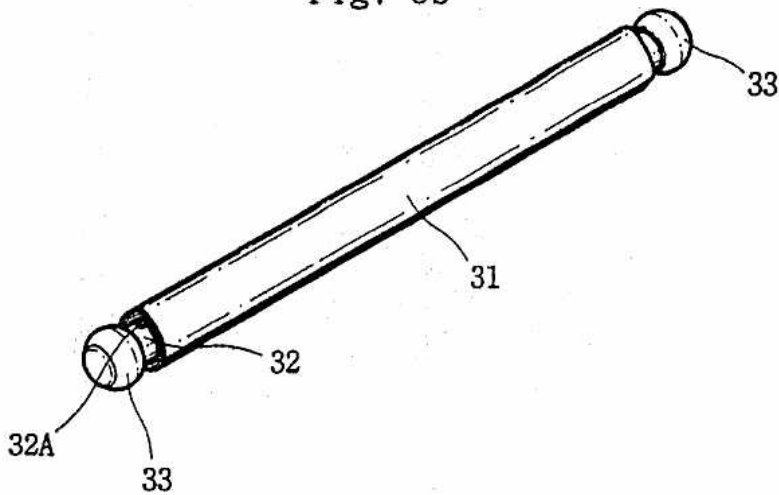


Fig. 4

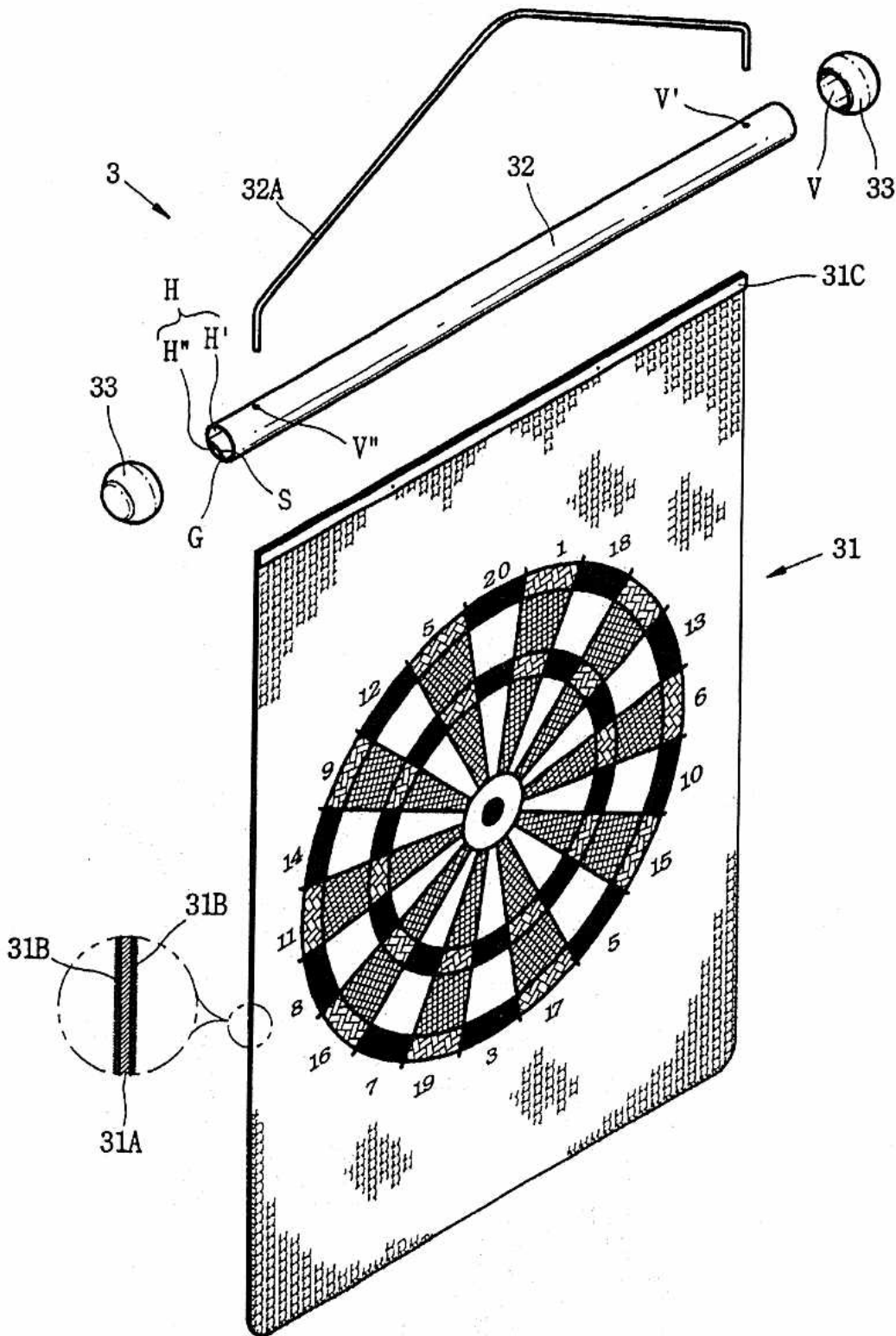
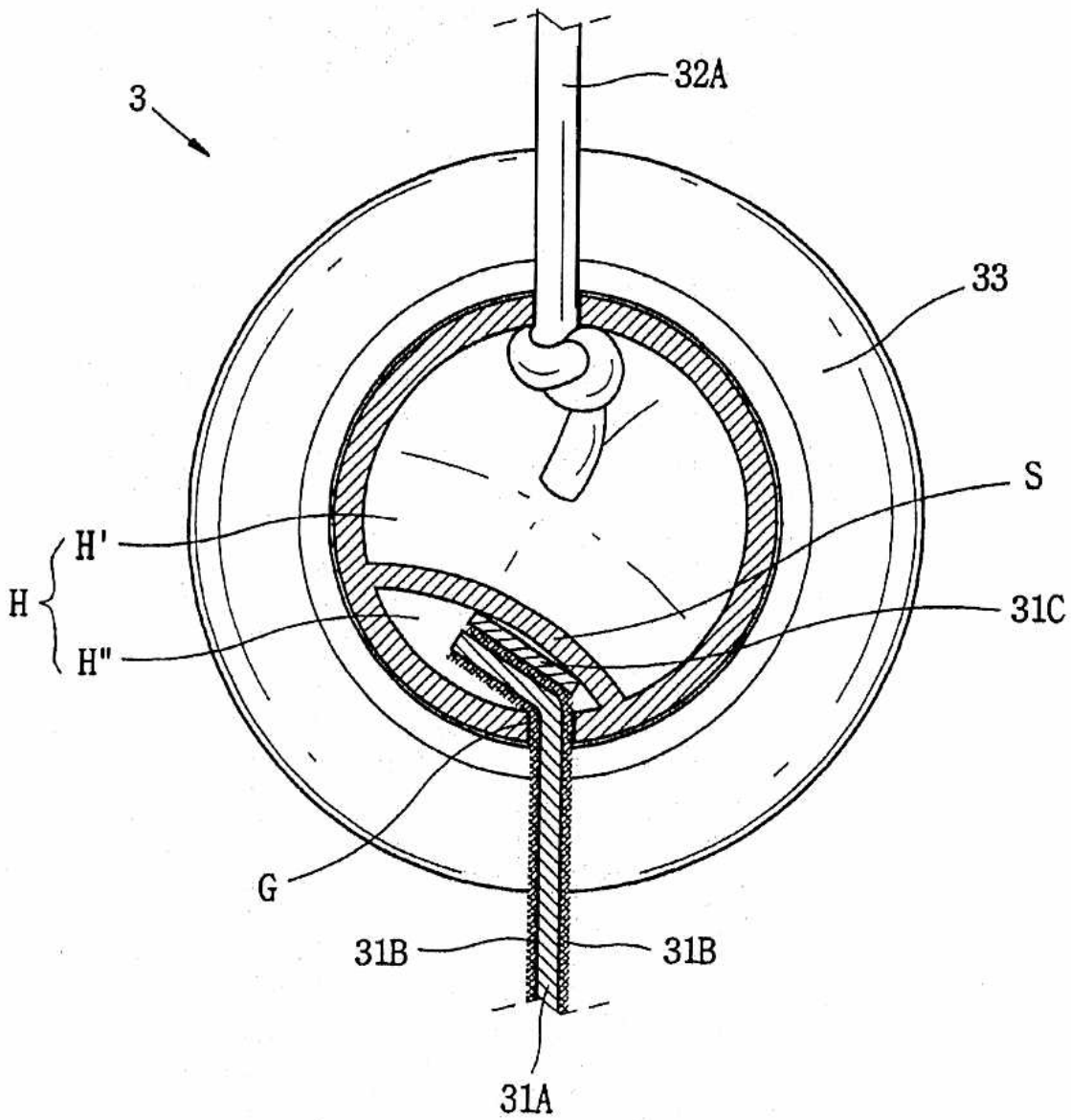


Fig. 5



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DARTBOARD WITH MAGNETIC RUBBER SHEET

BACKGROUND OF THE INVENTION

1. Field of the Invention

The present invention relates generally to a magnetic dartboard, which is capable of being rolled, in the manner of cloth and paper and so is convenient to carry and keep, and more particularly to a dartboard with a magnetic rubber sheet, in which the rubber sheet is formed by mixing magnetic iron with rubber powder and vulcanizing the mixture to be magnetized, two sheets of cotton flannel having raisings are adhered to both surfaces of the rubber sheet, and a target is printed on one surface of the cotton flannel through a silk-screen process, thereby facilitating the carrying and keeping of the dartboard as well as reducing a noise produced when a magnetic dart is cast onto the dartboard.

2. Description of the Prior Art

A dart game is a western, indoor amusement in which darts are thrown several times at a target marked with concentric circles divided into segments and a bull's eye at its center, and in which a resulting score is calculated by adding up the point values of the portions hit by the darts so as to decide the game. Each of the darts is relatively short, and has a pointed tip.

Typically, a conventional dartboard onto which darts are thrown is made of wood, cork or compressed sawdust. Marked portions formed on the dartboard are adhered to or directly printed on the surface of the dartboard.

The conventional dartboard made of wood or the by-product of the wood has a problem in that it becomes unusable because many traces formed by the penetration of tips of the darts remain on the dartboard after dart games are played. This dartboard has another problem in that it is dangerous because it requires darts having metallic tips.

Therefore, in order to solve the above problems, there has been proposed another conventional dartboard, which is provided on its surface with many projections of synthetic resin and many depressions whose cross sectional shapes are rectangular and whose cross sectional areas are downwardly reduced as shown in FIG. 1.

Darts used for the second conventional dartboard made of the synthetic resin each have at its front end a pointed tip made of synthetic resin. A dart game is conducted by throwing the darts onto the second conventional dartboard, whereby the pointed tips of the darts are inserted into the depressions **11** formed between the projections made of synthetic resin and provided on the surface of the dartboard.

Since the second conventional dartboard and the second conventional darts are made of synthetic resin, the damage of the dartboard and the risk of injury can be eliminated. However, the conventional dartboard is provided with a plurality of projections and depressions, so it is difficult to fabricate the dartboard in comparison with a first conventional wooden dartboard and the fabricating costs of the dartboard is increased.

Therefore, there has been proposed a further conventional dartboard with darts which uses a steel plate and a magnet so as to prevent the dartboard from being damaged as well as reducing fabricating costs of the dartboard and being free from danger. The construction of the dartboard is as follows.

As shown in FIG. 2, the third conventional dartboard is formed as a laminated structure comprising a target board

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21, a steel plate 22 and a rear paperboard 23. The steel plate 22 is adhered to the rear paperboard 23, and the target board 21 is adhered to the steel plate 22, such that the target board 21 forms the upper face of the dartboard. The front end of the dart 24 has a magnet.

In order to play the dart game, when the dart to which the magnet is attached is thrown onto the dartboard, the dart is adhered to the dartboard by magnetic attraction between the steel plate inserted into the dartboard and the magnet of the dart.

The third conventional dartboard into which the steel plate is inserted protects people in the playing area from getting hurt by the dart, is not damaged in spite of playing several dart games, and is easy to fabricate. However, it has a problem in that it makes a noise on throwing the dart onto the dartboard because the steel plate is inserted into the dartboard onto which the magnetic dart is thrown.

Therefore, the dartboard into which the steel plate is inserted is unsuitable for playing the game at a quiet place.

As described above, the conventional dartboards are difficult to carry and keep, because dartboards which are made of wood or synthetic resin or into which the steel plates are inserted are tablet-shaped and cannot be varied in form.

SUMMARY OF THE INVENTION

Accordingly, the present invention has been made keeping in mind the above problems occurring in the prior art, and an object of the present invention is to provide a dartboard with a magnetic dart, which is made of a rubber sheet to be flexible, thereby being convenient to carry and keep, preventing the surface of the dartboard from being damaged and reducing the impact noise of the dart on the dartboard.

In order to accomplish the above objects, the present invention provides a dartboard with a magnetic rubber sheet, comprising: a target board comprising a magnetic rubber sheet having a rectangular shape and containing iron, two sheets of cotton flannel having the same size as that of the magnetic rubber sheet, being attached to both surfaces of the magnetic rubber sheet and having raisings on their outer surfaces, and an upper fitted piece attached to the upper end of the front surface of one of said two sheets of flannel; a holding pole comprising, a hollow for holding one end of the target board, a slit formed along the entire length of the holding pole to pass through the inner and outer circumferential surfaces of the holding pole so that the lower peripheral portion of the upper end of the target board just under the upper fitted piece is laterally inserted into the slit to hold the upper end of the target board in the hollow, and holes formed in the vicinity of both ends of the holding pole so as to fasten a hanging string to the holding pole and hang the dartboard on the wall; and two closure members each provided with an inserting recess into which one end of the holding pole is inserted.

BRIEF DESCRIPTION OF THE DRAWINGS

The above and other objects, features and other advantages of the present invention will be more clearly understood from the following detailed description taken in conjunction with the accompanying drawings, in which:

FIG. 1 is a plan view showing a synthetic resin target board in accordance with a prior art, with a plurality of projections of the synthetic resin formed on one surface of the target board;

FIGS. 2a and 2b show a magnetic dart and a target board for magnetic darts in accordance with another prior art,

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wherein FIG. 2a is an exploded perspective view of this target board and FIG. 2b is a perspective view of this magnetic dart;

FIGS. 3a and 3b show a dartboard with a magnetic rubber sheet in accordance with an embodiment of the present invention, wherein FIG. 3a is a perspective view of the dartboard in an unrolled state and FIG. 3b is a perspective view of the dartboard in a rolled state;

FIG. 4 is an exploded perspective view of the dartboard having the magnetic rubber sheet in accordance with the embodiment; and

FIG. 5 is a detailed, partial sectional view showing the dartboard and its holding pole.

DESCRIPTION OF THE PREFERRED EMBODIMENTS

The principal features of a dartboard in accordance with the present invention are a vulcanized rubber sheet containing iron and two sheets of flannel whose outer surfaces are provided with raisings.

A magnetic rubber sheet applied to the dartboard of the present invention is manufactured by mixing 80-90 wt % iron with 10-20 wt % rubber powder and vulcanizing the mixture to form a tablet-shaped palette. The tabular rubber sheet made in this way not only is flexible but also has magnetism, that is the property of being attracted by magnets, due to the iron. This rubber sheet is flexible, so the sheet can be rolled easily around a medium such as a pole, in the manner of cloth or paper. The rubber sheet is not hard, so it reduces a noise when the magnet of the dart impacts on the surface of the dartboard, in comparison with hard plates such as a steel plate.

In the case where the magnetic rubber sheet contains iron less than 80 wt %, the magnetic dart is not well adhered to the dartboard. On the other hand, in the case where the magnetic rubber sheet contains iron more than 90 wt %, its iron content is so high that the magnetic rubber sheet is easily broken.

The two sheets of cotton flannel are adhered to both surfaces of the magnetic rubber sheet and have raisings on their outer surfaces. The flannel constructed in this way present a good appearance in addition to reducing the noise when the magnetic dart impacts on the dartboard and preventing the surface of the magnetic rubber sheet from being damaged in spite of repeated impacts by the magnetic dart. Concentric circles and point values are printed on one surface of the flannel through a silk-screen process.

FIG. 3 shows the dartboard with the magnetic rubber sheet in accordance with an embodiment of the present invention. FIG. 4 is an exploded perspective view of the dartboard with the magnetic rubber sheet in accordance with the embodiment. FIG. 5 is a detailed, partial cross sectional view showing the dartboard and its holding pole.

The dartboard 3 of the present invention is mainly comprised of a target board 31, a holding pole 32 and two closure members 33.

As shown in the drawings, the target board 31 includes a magnetic rubber sheet 31A, which has a rectangular shape and a high iron content. Two sheets of cotton flannel 31B are attached to both surfaces of the magnetic rubber sheet 31A, are equal to the magnetic rubber sheet 31A in size, and have raisings on their outside surface. An upper fitted piece 31C is attached to an upper end of the front surface of one of the two sheets of flannel.

A hollow holding pole 32 includes a hollow H for holding one end of the target board 31 to which the upper fitted piece

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31C is attached. A straight slit G is formed along the entire length of the holding pole 32 to pass through inner and outer circumferential surfaces of the holding pole 32 so that a lower peripheral portion of an upper end of the target board 31 just under the upper fitted piece 31C is laterally inserted into the slit G to hold the upper end of the target board 31 in the hollow H. Two fastening holes V are formed in the vicinity of both ends of the holding pole 32 so as to fasten a hanging string 32A to the holding pole 32 and hang the dartboard 3 on the wall.

Two closure members 33 each is provided with an inserting recess V into which one end of the holding pole 32 is inserted.

It is preferable to use an adhesive for adhering two sheets of the cotton flannel 31B to both surfaces of the magnetic rubber sheet 31A. It is more preferable to use a double-sided adhesive paper for adhering two sheets of the cotton flannel 31B to both surfaces of the magnetic rubber sheet 31A in terms of productivity. A target is printed through a silk-screen process on the outer surface of the cotton flannel 31B adhered to one surface of the magnetic rubber sheet 31A. Various patterns other than the target are able to be printed on the outer surface of the cotton flannel 31B adhered to another surface of the magnetic rubber sheet 31A through a silk-screen process and thus the dartboard 3 of the present invention can be used as a decorative item unless the dart game is played.

The hollow H of the holding pole 32 is divided into the small hollow portion H' and the large hollow portion H'' by means of the inner partition S. The slit G into which the target board 31 is fitted passes through inner and outer circumferential surfaces of the holding pole 32.

The reason why the hollow H of the holding pole 32 is divided into the small hollow portion H' and the large hollow portion H'' by means of the inner partition S is to increase the strength of the holding pole 32. Moreover, the maximum height of the small hollow portion H'' can be adjusted to have a length shorter than the width of the upper fitted piece 31C by means of the inner partition S, so one end of the target board 31 including the upper fitted piece 31C held in the small hollow portion H'' can be bent with regard to the non-inserted portion of the target board 31. Consequently, one end of the target board 31 including the upper fitted piece 31C held in the small hollow portion H'' is not slipped out of the holding pole 32 because one end of the target board 31 including the upper fitted piece 31C held in the small hollow portion H'' is securely fitted into the inside of the slit G.

As described above, the present invention provides the dartboard with the magnetic rubber sheet, which is comprised of the magnetic rubber sheet and two sheets of cotton flannel so that the dartboard is easily rolled around the holding pole and does not occupy too much space, thereby facilitating the carrying and keeping of the dartboard.

The present invention provides the dartboard with the magnetic rubber sheet, in which two sheets of the cotton flannel having raisings on their surface are adhered to the soft magnetic rubber sheet, thereby reducing the impact noise of the dart on the dartboard and being usable at a quiet place. The present invention provides the dartboard with the magnetic rubber sheet, in which other patterns as well as the target can be printed on the surface of the cotton flannel through a silk-screen process, thereby being used as a decorative item.

Although the preferred embodiments of the present invention have been disclosed for illustrative purposes, those

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skilled in the art will appreciate that various modifications, additions and substitutions are possible, without departing from the scope and spirit of the invention as disclosed in the accompanying claims.

What is claimed is:

1. A dartboard with a magnetic rubber sheet, comprising:
 - a target board comprising,
 - a magnetic rubber sheet having a rectangular shape and containing iron, and having a first surface and a second surface;
 - two sheets of cotton flannel having the same size as that of the magnetic rubber sheet, each flannel sheet having a front and back surface and a first edge and a second distal edge, a first said sheet of cotton flannel is attached to the first surface of the magnet sheet and the second sheet of cotton flannel is attached to said second surface of the magnetic rubber sheet, and
 - a fitted piece is attached to the first edge of the front surface of one of said two sheets of flannel;
 - a holding pole, comprising,
 - a hollow pole for holding one end of the target board, a slit formed along an entire length of the hollow pole and passing through inner and outer circumferential sur-

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faces of the hollow pole so that a lower peripheral portion of an upper end of the target board just under the upper fitted piece extends laterally into the slit to hold the upper end of the target board in the hollow pole, and

holes formed in the vicinity of both ends of the hollow pole so as to fasten a hanging string to the holding pole; and

two closure members each provided with an inserting recess into which one end of the hollow pole is inserted.

2. The dartboard with the magnetic rubber sheet according to claim 1, wherein said magnetic rubber sheet consists of 80-90 wt % iron and 10-20 wt % rubber.

3. The dartboard with the magnetic rubber sheet according to claim 1, wherein said hollow pole is divided into a small hollow portion and a large hollow portion by an inner partition.

4. The dartboard with the magnetic rubber sheet according to claim 3, wherein said slit is formed through a portion of the holding pole around the small hollow portion.

* * * * *

EXHIBIT B

KWAK, KIM & PARK

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

EQUITABLE PLAZA

3435 WILSHIRE BOULEVARD

SUITE 1720

LOS ANGELES, CALIFORNIA 90010

TELEPHONE (213) 252-9669

FAX (213) 252-9656

OUR FILE NUMBER

September 4, 2003

VIA US MAIL

T.O.Y.S. International Inc.
Family Games, Inc.
P.O. Box 97 Snowdon
Montreal, Quebec
Canada H3X 3T3

Re: Magnetic Dartboard

Dear Sir/Madam:

This office has been retained by Magnet4U, a Korean corporation ("our client"), in connection with the enforcement of certain intellectual property rights owned by our client relating to the manufacture of magnetic dartboards.

According to our research and investigation, we have determined that your company is currently importing, selling, marketing or otherwise distributing certain magnetic dartboards. Our review of the magnetic dartboards being distributed by your company ("Your Products") has confirmed that such products infringe on the patent owned by our client. Enclosed herein for your information are copies of patent no. US6,517,075B1 issued by the USPTO on February 11, 2003 to our client.

This letter is a cease and desist letter to your company, meaning that your company is to immediately cease importing, marketing, selling or otherwise distributing Your Products in the future. We hereby demand that your company send us within the next 10 days detailed accounting records showing us the total amounts of Your Products sold by your company to this date.

If your company fully and immediately complies with the demands contained in this letter, then our client may be inclined not to seek damages against your company in exchange for your company's commitment to purchase magnetic dartboards exclusively from our client in the future.

In order to stop further enforcement action by our office against your company, we strongly encourage you to contact Joanne Back of this office within the next 10 days.

If our client is satisfied that your company is committed to not violating the patent right held by our client relating to magnetic dartboards, then our client will consider supplying magnetic dartboards to your company rather than pursuing legal remedies against your company. However, if your company fails to contact us in the next ten days and continues to violate the patent right held by our client, then our client has instructed our office to take any and all legal remedies against your company including without limitation an action to prevent Your Products from being imported into the United States and recover full amounts of damages permitted under applicable laws. Please keep in mind that any willful violation of our client's patent right may subject your company to treble damages.

Please act accordingly.

Very Truly Yours,

KWAK, KIM & PARK



William H.Y. Park, Esq.

Encls.

EXHIBIT C

KWAK, KIM & PARK
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
EQUITABLE PLAZA
3435 WILSHIRE BOULEVARD
SUITE 1720
LOS ANGELES, CALIFORNIA 90010
TELEPHONE (213) 252-9669
FAX (213) 252-9656

OUR FILE NUMBER

September 4, 2003

VIA US MAIL

JT Puffins
5505 Odana Rd.
Madison, WI 53719

Re: Magnetic Dartboard

Dear Sir/Madam:

This office has been retained by Magnet4U, a Korean corporation ("our client"), in connection with the enforcement of certain intellectual property rights owned by our client relating to the manufacture of magnetic dartboards.

According to our research and investigation, we have determined that your company is currently importing, selling, marketing or otherwise distributing certain magnetic dartboards. Our review of the magnetic dartboards being distributed by your company ("Your Products") has confirmed that such products infringe on the patent owned by our client. Enclosed herein for your information are copies of patent no. US6,517,075B1 issued by the USPTO on February 11, 2003 to our client.

This letter is a cease and desist letter to your company, meaning that your company is to immediately cease importing, marketing, selling or otherwise distributing Your Products in the future. We hereby demand that your company send us within the next 10 days detailed accounting records showing us the total amounts of Your Products sold by your company to this date.

If your company fully and immediately complies with the demands contained in this letter, then our client may be inclined not to seek damages against your company in exchange for your company's commitment to purchase magnetic dartboards exclusively from our client in the future.

In order to stop further enforcement action by our office against your company, we strongly encourage you to contact Joanne Back of this office within the next 10 days.
If our client is satisfied that your company is committed to not violating the patent right

held by our client relating to magnetic dartboards, then our client will consider supplying magnetic dartboards to your company rather than pursuing legal remedies against your company. However, if your company fails to contact us in the next ten days and continues to violate the patent right held by our client, then our client has instructed our office to take any and all legal remedies against your company including without limitation an action to prevent Your Products from being imported into the United States and recover full amounts of damages permitted under applicable laws. Please keep in mind that any willful violation of our client's patent right may subject your company to treble damages.

Please act accordingly.

Very Truly Yours,

KWAK, KIM & PARK



William H.Y. Park, Esq.

Encls.

EXHIBIT D

KWAK, KIM & PARK
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
EQUITABLE PLAZA
3438 WILSHIRE BOULEVARD
SUITE 1720
LOS ANGELES, CALIFORNIA 90010
TELEPHONE (213) 252-8668
FAX (213) 252-8658

Received in
Customer Service
9-10-03.
Will send all
paperwork with
messenger on 9-11-0

September 4, 2003

VIA US MAIL

Spilsbury
3650 Milwaukee Street
P.O. Box 8922
Madison, WI 53708-8922

Sue

Re: Magnetic Dartboard

Dear Sir/Madam:

This office has been retained by Magnet4U, a Korean corporation ("our client"), in connection with the enforcement of certain intellectual property rights owned by our client relating to the manufacture of magnetic dartboards.

According to our research and investigation, we have determined that your company is currently importing, selling, marketing or otherwise distributing certain magnetic dartboards. Our review of the magnetic dartboards being distributed by your company ("Your Products") has confirmed that such products infringe on the patent owned by our client. Enclosed herein for your information are copies of patent no. US6,517,075B1 issued by the USPTO on February 11, 2003 to our client.

This letter is a cease and desist letter to your company, meaning that your company is to immediately cease importing, marketing, selling or otherwise distributing Your Products in the future. We hereby demand that your company send us within the next 10 days detailed accounting records showing us the total amounts of Your Products sold by your company to this date.

If your company fully and immediately complies with the demands contained in this letter, then our client may be inclined not to seek damages against your company in exchange for your company's commitment to purchase magnetic dartboards exclusively from our client in the future.

In order to stop further enforcement action by our office against your company, we strongly encourage you to contact Joanne Back of this office within the next 10 days.

If our client is satisfied that your company is committed to not violating the patent right held by our client relating to magnetic dartboards, then our client will consider supplying magnetic dartboards to your company rather than pursuing legal remedies against your company. However, if your company fails to contact us in the next ten days and continues to violate the patent right held by our client, then our client has instructed our office to take any and all legal remedies against your company including without limitation an action to prevent Your Products from being imported into the United States and recover full amounts of damages permitted under applicable laws. Please keep in mind that any willful violation of our client's patent right may subject your company to treble damages.

Please act accordingly.

Very Truly Yours,

KWAK, KIM & PARK



William H. Y. Park, Esq.

Encls.

EXHIBIT E

보낸 사람: davidyoo [davidyoo@magnet4u.com]

보낸 날짜: 2004년 10월 8일 금요일 오후 7:55

받는 사람: 'AHirst@Brookstone.com'

참조: 'webmaster@magnet4u.com'

제목: Magnetic Dartboard - US Patent No. 6,517,075

Dear Ms. Hirst,

Thanks for your quick reply to our e-mail regarding patent violation.

We regret to say you that as a result of our thorough research through our attorney in the U. S. A., both of our attorney and us concluded that your Brookstone SKU#336149 definitely violated the U. S. A. patent we hold.

Since your Brookstone is still selling this item after our previous notice last year, we think it is reasonable to discuss this patent issue with your company in advance before we go to Family Games Inc.

The crucial reason we concluded your SKU #336149 violated the patent is that the magnetic dart can not be stuck onto the surface of the roll up dartboard without any metal or magnetic particles inside the dartboard when throwing the dart on the dartboard.

As per the description of your SKU#33619 in your internet home page, your dart board Is constructed of magnetic particles fused with rubber, which infringes on our product of magnetic roll up dart board we patented.

We would like to know the reason why your company concluded your SKU #336149 did not violate the patent.

In addition, we kindly ask you of providing the structure of your dart board if you really don't agree your item violated the patent.

For your reference, please see the copies of our patent and your previous response attached here.

Your sincere response would be highly appreciated.

Best Regards

Magnet4u Co, Ltd.

David Yoo - Vice President