

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

FILED-5

2004 DEC -7 PM 2.

CLERK
U.S. DISTRICT COURT
DOCKETED

DEC 08 2004

Case No.

Judge

Magistrate

04C-7911

JUDGE GOTTSCHALL
MAGISTRATE JUDGE MASON

JURY TRIAL DEMANDED

AMCO HOUSEWORKS, LLC, an Illinois)
limited liability company,)
)
Plaintiff,)
)
v.)
)
PIKES PEAK DIRECT MARKETING, INC.,)
d/b/a CHEF'S CATALOG, a Delaware)
corporation,)
)
Defendant.)

COMPLAINT

Plaintiff, AMCO Houseworks, LLC ("AMCO"), for its complaint against defendant, Pikes Peak Direct Marketing, Inc., d/b/a Chef's Catalog ("Chef's Catalog"), alleges as follows:

NATURE OF ACTION

1. This action is based on patent infringement, false advertising, unfair competition, unfair and deceptive trade practices and deceptive business practices, arising under the Patent Act (35 U.S.C. § 100 et seq.), the Lanham Act (15 U.S.C. § 1125(a)), the Illinois Deceptive Trade Practices Act (815 ILCS 510/1 et seq.), the Illinois Consumer Fraud and Deceptive Business Practices Act (815 ILCS 505/1 et seq.) and Illinois common law.

THE PARTIES

2. AMCO is a limited liability company organized under the laws of the State of Illinois with its principal place of business in Vernon Hills, Illinois.

3. On information and belief, Chef's Catalog is an assumed name of Pikes Peak Direct Marketing, Inc., a corporation organized under the laws of the State of Delaware with its principal place of business in Colorado Springs, Colorado.

1-1

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction pursuant to 35 U.S.C. §§ 271 and 281, 15 U.S.C. §§ 1121 and 1125(a) and 28 U.S.C. §§ 1331 and 1338(a) and (b). This Court also has jurisdiction over the pendant claims arising under state law pursuant to 28 U.S.C. § 1338(b). This Court has personal jurisdiction over defendant in that defendant transacts business and has made, used, offered for sale or sold infringing products in this District.

5. Venue is proper in this District, pursuant to 28 U.S.C. §§ 1391(b) and 1400(b), because a substantial part of the events giving rise to AMCO's claims and defendant's acts of infringement occurred in Chicago, Illinois, and defendant is subject to personal jurisdiction in this District.

STATEMENT OF FACTS

6. AMCO is in the business of designing, creating, manufacturing and selling kitchen utensils, cookware and related products. AMCO sells its products under its own name and as private label goods, to various retailer outlets throughout the United States, including to defendant, Chef's Catalog.

7. On information and belief, Chef's Catalog is a retailer in the business of selling kitchen utensils, cookware and related products to consumers. Chef's Catalog's products are sold throughout the United States and in this District, through retail outlets in Chicago and Highland Park, Illinois, in mail order catalogs and via its Internet web site.

8. Chef's Catalog has an Internet web site located at www.chefscatalog.com, on which it offers for sale numerous kitchen utensils, cookware and related products. This web site is fully interactive, as customers in Illinois and throughout the U.S. can order products on-line directly through the web site. Copies of pages from that web site are attached as Exhibit A.

Chef's Catalog also offers its products in its retail stores in Chicago and Highland Park, Illinois, and in its mail order catalogs (see Exhibit A).

9. AMCO designed and created a series of three stainless steel kitchen brushes ("AMCO's Brushes"), which were the subject of Design Patent Application Nos. 176604 (issued as Patent No. D480,215), 176560 (issued as Patent No. D480,219) and 176603 (issued as Patent No. D480,878), each filed on February 24, 2003.

10. In December 2002, AMCO sent a postcard featuring a photograph of AMCO's Brushes to its customers, advertising its booth at the International Housewares Show in Chicago on January 12-14, 2003 (see Exhibit B). On or about January 7, 2003, Chef's Catalog requested that AMCO send samples of AMCO's Brushes so that they could be photographed for inclusion in the April/May catalog of Chef's Catalog. In requesting the AMCO Brushes, Chef's Catalog represented that if AMCO provided the brush samples by January 15, 2003, Chef's Catalog would include AMCO's Brushes in the April/May catalog and would fill any orders with AMCO's Brushes. In response to this request by Chef's Catalog, AMCO sent the brush samples to Chef's Catalog on or about January 10, 2003.

11. The April/May mail order catalog from Chef's Catalog and its online catalog featured photographs of at least two of the three AMCO Brushes (see Exhibits C and D). Chef's Catalog, however, did not purchase any of the advertised kitchen brushes from AMCO. Instead, on information and belief, Chef's Catalog filled orders for the brushes with products purchased from AMCO's competitor MIU France. The MIU France brushes sold by Chef's Catalog were copied from and substantially similar to the AMCO Brushes. Thus, Chef's Catalog used photographs of AMCO's Brushes to sell products of MIU France.

12. On or about May 6, 2003, AMCO's counsel sent a letter to Chef's Catalog complaining about Chef's Catalog's use of photographs of AMCO products to sell the products

of another company and demanding the identity of the source of the brushes used by Chef's Catalog to fill customer orders from its web site (see Exhibit E).

13. AMCO's counsel sent a similar letter on or about May 13, 2003, to the General Counsel of the Neiman Marcus Group, the company that then owned Chef's Catalog (see Exhibit F).

14. On or about June 20, 2003, counsel for the Neiman Marcus Group responded that MIU France, the vendor of the brushes, would reply to AMCO's letters and that the offending photographs of the brushes would be removed from the web site and the complained-of brushes would not be featured in future Chef's Catalog catalogs until the matter was resolved (see Exhibit G). AMCO thus believed that the issue was resolved with Chef's Catalog.

15. AMCO then continued to pursue the matter directly with the vendor, MIU France and MIU France's manufacturer, Supreme Manufacturing Co. Ltd. On or about August 19, 2004, Supreme Plastic represented that MIU France would cease all sales of the complained-of brushes at issue (see Exhibit H). AMCO reasonably believed that the issue was resolved with MIU France.

16. On October 7, 2003, United States Design Patent No. D480,215 ("the '215 patent"), entitled "Brush," was duly and legally issued to AMCO as assignee and, since that date, AMCO has been and still is the owner of this patent. A true copy of the '215 patent is attached as Exhibit I.

17. On October 7, 2003, United States Design Patent No. D480,219 ("the '219 patent"), entitled "Brush," was duly and legally issued to AMCO as assignee and, since that date, AMCO has been and still is the owner of this patent. A true copy of the '219 patent is attached as Exhibit J.

18. On October 21, 2003, United States Design Patent No. D480,878 (“the ‘878 patent”), entitled “Brush,” was duly and legally issued to AMCO as assignee and, since that date, AMCO has been and still is the owner of this patent. A true copy of the ‘878 patent is attached as Exhibit K.

19. AMCO has recently become aware that Chef’s Catalog has recommenced offering for sale on its web site the three brushes (see Exhibit A) copied from AMCO’s brushes and about which AMCO complained in May 2003. As set forth in Paragraphs 16-18 above, AMCO has now obtained design patents (Exhibits I, J and K) for the AMCO Brushes that have been copied and that Chef’s Catalog is presently selling. Moreover, on information and belief, two of the three photographs currently displayed on Chef’s Catalog’s web site of the complained-of brushes (Exhibit A) are photographs of AMCO’s Brushes although the brushes actually being sold by Chef’s Catalog are the pirated copies, not AMCO Brushes.

20. Moreover, Chef’s Catalog has commenced using altered photographs of another AMCO product, namely, AMCO’s flexible spatula (“AMCO’s Spatula”), to sell flexible spatulas purchased from MIU France (see Exhibit A).

21. On information and belief, photographs of AMCO’s Spatula were altered by Chef’s Catalog to depict blue and red working ends instead of AMCO’s black working end. However, the photographed spatula is still recognizably that of AMCO and not that of MIU France. Chef’s Catalog never ordered from AMCO any of AMCO’s Spatulas depicted in the altered photographs. Rather, on information and belief, Chef’s Catalog is using unauthorized copies of AMCO’s Spatulas to fill its customers’ orders. On information and belief, these unauthorized copies are of inferior quality to AMCO’s products.

22. Chef’s Catalog is therefore engaging in a pattern and practice of using photographs of AMCO’s products to sell inferior products of MIU France.

23. AMCO has not given Chef's Catalog permission to use photographs of AMCO's products to sell the products of any of AMCO's competitors, including MIU France.

24. The photographs of AMCO's products that have been used by Chef's Catalog to advertise the products of MIU France are literally false and misleading, and their use on the web site of Chef's Catalog continues and will continue to damage the sales, goodwill and reputation of AMCO in the kitchenware industry and in the minds of consumers.

COUNT I

(Infringement of Design Patent No. D480,215)

25. AMCO realleges and incorporates by reference herein the allegations of paragraphs 1-24 as if fully set forth herein.

26. On October 7, 2003, the United States Patent and Trademark Office ("PTO") duly and legally issued United States Design Patent No. D480,215 ("the '215 Patent"), entitled "Brush," naming Michael R. Mastroianni as inventor. A true copy of the '215 Patent is attached to this Complaint as Exhibit I.

27. The inventor of the '215 patent, Michael R. Mastroianni, assigned to AMCO his entire right, title and interest to the '215 Patent, including the right to pursue infringers and recover for infringement of the '215 Patent.

28. Chef's Catalog is and has been willfully infringing, or inducing or contributing to the infringement of the '215 Patent by making, using, marketing, offering for sale, selling, or importing products covered by the claim of the '215 Patent. Chef's Catalog will likely continue to infringe or induce or contribute to the infringement of the '215 Patent unless it is enjoined by this Court.

29. By reason of Chef's Catalog's aforementioned acts of infringement, AMCO has been and will continue to be, irreparably damaged unless this Court enjoins Chef's Catalog from continuing to infringe the '215 Patent.

COUNT II

(Infringement of Design Patent No. D480,219)

30. AMCO realleges and incorporates by reference herein the allegations of paragraphs 1-24 as if fully set forth herein.

31. On October 7, 2003, the PTO duly and legally issued United States Design Patent No. D480,215 ("the '219 Patent"), entitled "Brush," naming Michael R. Mastroianni as inventor. A true copy of the '219 Patent is attached to this Complaint as Exhibit J.

32. The inventor of the '219 patent, Michael R. Mastroianni, assigned to AMCO his entire right, title and interest to the '219 Patent, including the right to pursue infringers and recover for infringement of the '219 Patent.

33. Chef's Catalog is and has been willfully infringing, or inducing or contributing to the infringement of the '219 Patent by making, using, marketing, offering for sale, selling, or importing products covered by the claim of the '219 Patent. Chef's Catalog will likely continue to infringe or induce or contribute to the infringement of the '219 Patent unless it is enjoined by this Court.

34. By reason of Chef's Catalog's aforementioned acts of infringement, AMCO has been and will continue to be irreparably damaged unless this Court enjoins Chef's Catalog from continuing to infringe the '219 Patent.

COUNT III

(Infringement of Design Patent No. D480,878)

35. AMCO realleges and incorporates by reference herein the allegations of paragraphs 1-24 as if fully set forth herein.

36. On October 21, 2003, the PTO duly and legally issued United States Design Patent No. D480,215 (“the ‘878 Patent”), entitled “Brush,” naming Michael R. Mastroianni as inventor. A true copy of the ‘878 Patent is attached to this Complaint as Exhibit K.

37. The inventor of the ‘878 patent, Michael R. Mastroianni, assigned to AMCO his entire right, title and interest to the ‘878 Patent, including the right to pursue infringers and recover for infringement of the ‘878 Patent.

38. Chef’s Catalog is and has been willfully infringing, or inducing or contributing to the infringement of the ‘878 Patent by making, using, marketing, offering for sale, selling, or importing products covered by the claim of the ‘878 Patent. Chef’s Catalog will likely continue to infringe or induce or contribute to the infringement of the ‘878 Patent unless it is enjoined by this Court.

39. By reason of Chef’s Catalog’s aforementioned acts of infringement, AMCO has been and will continue to be, irreparably damaged unless this Court enjoins Chef’s Catalog from continuing to infringe the ‘878 Patent.

COUNT IV

(Violation of Lanham Act)

40. AMCO realleges and incorporates by reference herein the allegations of paragraphs 1-24 as if fully set forth herein.

41. Chef’s Catalog has committed unfair competition and has published commercial advertising that is false and misleading in that the complained-of advertising misrepresents the

nature, characteristics or qualities of the advertised goods through a false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which is likely to cause confusion, or to cause mistake, or to deceive as to the origin, sponsorship, or approval of Chef's Catalog's goods, all in violation of § 43(a)(1) of the Lanham Act (15 U.S.C. § 1125(a)(1)). Chef's Catalog's acts as described above constitute a false or misleading description or representation in that photographs of AMCO's Brushes and Spatulas have been used, and are being used, to sell products of AMCO's competitors.

42. Chef's Catalog's actions are willful and wanton.

43. Because of Chef's Catalog's false advertising, AMCO has suffered and will continue to suffer irreparable harm unless Chef's Catalog is restrained from such conduct. AMCO has no adequate remedy at law.

44. Because of Chef's Catalog's acts, AMCO has suffered damages and Chef's Catalog has been unjustly enriched.

COUNT V

(Violation of Consumer Fraud and Deceptive Business Practices Act)

45. AMCO realleges and incorporates by reference herein the allegations in paragraphs 1-24 as if fully set forth herein.

46. Chef's Catalog's unlawful conduct and false advertising constitute unfair competition, deceptive business practices and false and misleading representations of fact, that mislead, deceive and damage in violation of the Consumer Fraud and Deceptive Business Practices Act (815 ILCS 505/1 et seq.) of the Illinois Compiled Statutes. Chef's Catalog intended that consumers rely on its false advertising. Chef's Catalog's false and misleading photographs were directed toward the market generally and/or implicate consumer protection concerns.

photographs were directed toward the market generally and/or implicate consumer protection concerns.

47. Chef's Catalog's actions in publishing the false photographs were willful and wanton.

48. Because of Chef's Catalog's false advertising concerning AMCO's Brushes and Spatulas, AMCO has suffered and will continue to suffer irreparable harm unless Chef's Catalog is restrained from such conduct. AMCO has no adequate remedy at law.

49. Because of Chef's Catalog's acts, AMCO has suffered damages and Chef's Catalog has been unjustly enriched.

COUNT VI

(Violation of Deceptive Trade Practices Act)

50. AMCO realleges and incorporates by reference herein the allegations of paragraphs 1-24 as if fully set forth herein.

51. Chef's Catalog's unlawful, willful and wanton conduct and false advertising concerning AMCO's Brushes and Spatulas constitute deceptive trade practices that disparage AMCO's products in violation of the Illinois Deceptive Trade Practices Act (815 ILCS 510/1 et seq.) of the Illinois Compiled Statutes.

52. Because of Chef's Catalog's false advertising, AMCO has suffered and will continue to suffer irreparable harm unless Chef's Catalog is restrained from such conduct. AMCO has no adequate remedy at law.

53. Because of Chef's Catalog's acts, AMCO has suffered damages and Chef's Catalog has been unjustly enriched.

COUNT VII

(Illinois Common Law Unfair Competition)

54. AMCO realleges and incorporates by reference herein the allegations in paragraphs 1-24 as if fully set forth herein.

55. Chef's Catalog's unlawful, willful and wanton conduct and false advertising constitute unfair competition and passing off of another's products for those of AMCO under the common law of the State of Illinois.

56. Because of Chef's Catalog's false advertising concerning AMCO's Brushes and Spatulas, AMCO has suffered and will continue to suffer irreparable harm unless Chef's Catalog is restrained from such conduct. AMCO has no adequate remedy at law.

57. Because of Chef's Catalog's acts, AMCO has suffered damages and Chef's Catalog has been unjustly enriched.

JURY DEMAND

58. Plaintiff AMCO demands a trial by jury on all matters and issues triable by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, AMCO Houseworks, LLC ("AMCO"), respectfully requests that:

A. Judgment be entered against defendant Pike's Peak Direct Marketing, Inc. ("Chef's Catalog") stating that it has infringed U.S. Design Patent Nos. D480,215, D480,219 and D480,878;

B. Chef's Catalog, its respective officers, directors, agents, servants, employees, successors, assigns, parent and affiliated companies, and all those controlled by or in active concert or participation with defendant, be preliminarily and permanently enjoined from infringing, inducing others to infringe, and contributing to the infringement of the patents in suit;

C. This Court order an accounting of Chef's Catalog's patent infringement and Chef's Catalog be ordered to pay to AMCO its damages in an amount adequate to compensate AMCO for Chef's Catalog's acts of patent infringement, but in no event less than a reasonable royalty for the use made of AMCO's inventions, and to pay to AMCO pursuant to 35 USC § 289 the total profits made by Chef's Catalog from its infringement;

D. Chef's Catalog be adjudged a willful infringer and be ordered to pay AMCO enhanced or treble damages due to its knowing, willful and wanton patent infringement;

E. This Court enter a judgment that this is an exceptional case under 35 USC § 285 and that Chef's Catalog be ordered to pay the AMCO's attorneys' fees, expenses, and costs in connection with this action;

F. Chef's Catalog, its officers, directors, agents, servants, employees, successors, assigns, parent and affiliated companies and all those controlled by or in active concert or participation with it be preliminarily and permanently enjoined from any further publication, dissemination or use of the photographs of AMCO's Brushes or Spatula (collectively, the "Photographs") or any other false, deceptive or misleading information or documents pertaining in any way to AMCO and its products;

G. This Court enter an order requiring Chef's Catalog to: (i) provide a true, accurate and complete list of the names and addresses of all persons and entities to whom the MIU France brushes or spatulas were sold, sent, delivered or provided and (ii) send (by the same manner as the brushes or spatulas were originally sent) a full, complete, clear and understandable explanation of the false advertising in a form acceptable to AMCO and the Court to each and every person and entity on the list provided under subsection (i);

H. This Court enter an order (i) ordering Chef's Catalog to pay AMCO pursuant to 15 USC § 1117(a) Chef's Catalog's profits and AMCO's damages in an amount to be determined

by the Court for Chef's Catalog's wrongful publication of the Photographs; (ii) awarding AMCO punitive damages for the willful and wanton nature of Chef's Catalog's wrongful acts; (iii) awarding AMCO its costs in this action, including reasonable attorneys' fees; and (iv) awarding AMCO all interest allowable by law; and

I. This Court grant AMCO such other and further relief as this Court deems appropriate.

Respectfully submitted,

Dated: December 7, 2004

By: Judith L. Grubner

Charles A. Laff

Martin L. Stern

Judith L. Grubner

Brian J. Lum

MICHAEL BEST & FRIEDRICH LLP

401 North Michigan Avenue, Suite 1900

Chicago, Illinois 60611

Phone: (312) 222-0800

Attorneys for Plaintiff

AMCO HOUSEWORKS, LLC



SEARCH

GIFT REGISTRY | WISH LIST | YOUR ACCOUNT | HELP | SH

COOKWARE	CUTLERY	KITCHEN ELECTRICS	KITCHEN TOOLS	BRANDS
BAKEWARE	ENTERTAINING	GIFTS & FOOD	HOUSEHOLD HELPERS	CLEAR
FREE STANDARD SHIPPING - NO MINIMUM! LIMITED TIME ▶				WHAT'S

Search Results: Here are the product matches for "brushes".
Narrow your search by using the categories to the left.

SORT BY

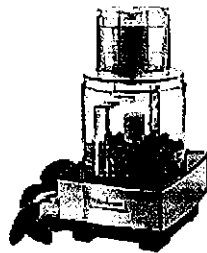
Found: 196 items

1 | 2 | 3 | 4 | 5 (of 14)

REFINE BY:

PRICE
\$0.00 - \$300.00
\$300.00 - \$600.00
\$600.00 - \$900.00
\$900.00 - \$1,200.00

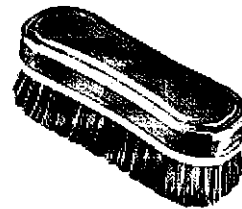
Search
▶ Click to help refine search



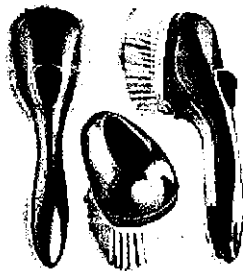
Cuisinart Brushed Stainless Custom 14-Cup Food Processor
Price \$199.99



Stainless Steel Scrub Brush
Price \$7.99



Stainless Steel Rectangular Brush
Price \$9.99



Stainless Steel Pump Dish Brushes
Price from \$9.99



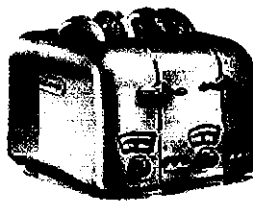
Stainless Steel Long-Handle Brush
Price \$9.99



new Stemware Brush
Price \$6.99



Cuisipro Dish Brush



DeLonghi Retro Brushed



new Brush & Plunger

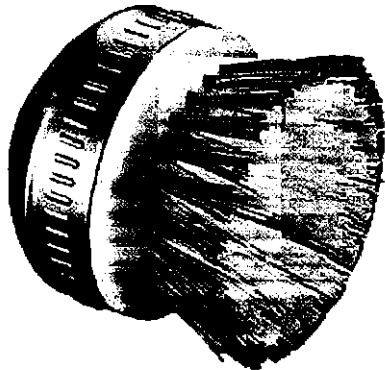




SEARCH

GIFT REGISTRY | WISH LIST | YOUR ACCOUNT | HELP | SH

COOKWARE	CUTLERY	KITCHEN ELECTRICS	KITCHEN TOOLS	BRAND
BAKEWARE	ENTERTAINING	GIFTS & FOOD	HOUSEHOLD HELPERS	CLEAR
FREE STANDARD SHIPPING - NO MINIMUM! LIMITED TIME ▶				WHAT'S



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Stainless Steel Scrub Brush

Sleek stainless steel handle and effective nylon bristles that won't scratch nonstick surfaces. Round scrub brush, 2 1/2" Dia.

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- [Online chat](#)
- [Shipping info](#)
- [Return policy](#)
- [Gift wrap det](#)



[Larger View](#)

Item	Quantity	Inform
Stainless Steel Scrub Brush	<input type="text" value="1"/>	Status: In Sto
Item # 9451		• Gift Wrap Avail
CHEF'S Price:	7.99	

ADD TO SHOP
[ADD TO W](#)

[CATALOG QUICK ORDER](#) |
 [REQUEST A CATALOG](#) |
 [GIFT CARDS](#) |
 [TO FIGHT HUNGER](#) |
 [TO GET CHEF'S OFFERS & UP](#)

© 2004, CHEF'S Catalog



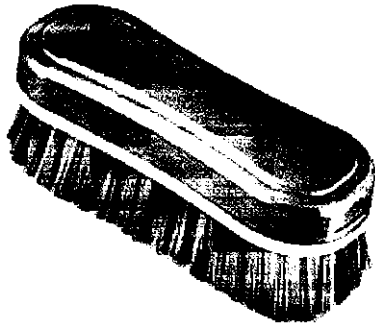
SEARCH

GIFT REGISTRY | WISH LIST | YOUR ACCOUNT | HELP | SH

COOKWARE	CUTLERY	KITCHEN ELECTRICS	KITCHEN TOOLS	BRANDY
BAKEWARE	ENTERTAINING	GIFTS & FOOD	HOUSEHOLD HELPERS	CLEAR
FREE STANDARD SHIPPING - NO MINIMUM! LIMITED TIME ▶				WHAT'S

Stainless Steel Rectangular Brush

Need help?



Sleek stainless steel handle and effective nylon bristles that won't scratch nonstick surfaces. Rectangular brush, 6" x 2 1/4"

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- [E-mail us](#)
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- [Shipping info](#)
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Item	Quantity	Inform:
Stainless Steel Rectangular Brush	<input type="text" value="1"/>	Status: In Stock
Item # 9452		• Gift Wrap Available
CHEF'S Price:	9.99	

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CATALOG QUICK ORDER

REQUEST A CATALOG

GIFT CARDS

SOS TO FIGHT HUNGER

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SEARCH

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COOKWARE	CUTLERY	KITCHEN ELECTRICS	KITCHEN TOOLS	BRAND
BAKEWARE	ENTERTAINING	GIFTS & FOOD	HOUSEHOLD HELPERS	CLEAR
FREE STANDARD SHIPPING - NO MINIMUM! LIMITED TIME ▶				WHAT'S



[Larger View](#)

Stainless Steel Long-Handle Brush

Sleek stainless steel handle and effective nylon bristles that won't scratch nonstick surfaces. Long-handle brush for dishes, 9" x 2 1/4"

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- [Gift wrap det](#)



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Item	Quantity	Inform:
Stainless Steel Long-Handle Brush	<input type="text" value="1"/>	Status: In Sto
Item # 9450		• Gift Wrap Avail
CHEF'S Price:	9.99	

ADD TO SHOP
ADD TO W

CATALOG QUICK ORDER

REQUEST A CATALOG

GIFT CARDS

30S TO FIGHT HUNGER

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SEARCH

GIFT REGISTRY | WISH LIST | YOUR ACCOUNT | HELP | SH

COOKWARE	CUTLERY	KITCHEN ELECTRICS	KITCHEN TOOLS	BRANDS
BAKEWARE	ENTERTAINING	GIFTS & FOOD	HOUSEHOLD HELPERS	CLEAR
FREE STANDARD SHIPPING - NO MINIMUM! LIMITED TIME				WHAT'S

Search Results: Here are the product matches for "spatulas".
Narrow your search by using the categories to the left.

SORT BY

Found: 52 items

1 | 2 | 3 |

REFINE BY:

PRICE

- \$0.00 - \$100.00
- \$100.00 - \$200.00
- \$200.00 - \$300.00
- \$700.00 - \$800.00

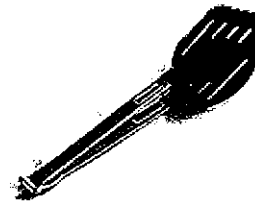
Search
 Click here for help re search



new KitchenAid
Silicone Spatula/Scraper
Price from \$7.99



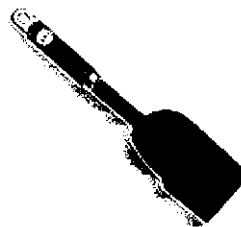
new KitchenAid
Silicone Spoon/Spatula
Price from \$7.99



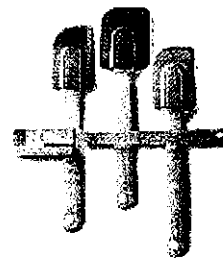
new Double Slotted Spatula
Price \$12.99



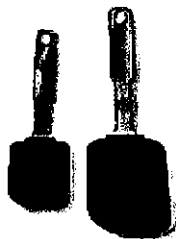
new KitchenAid
Silicone Spatula/Turner
Price from \$9.99



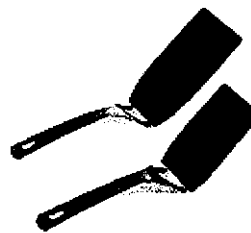
new KitchenAid
Triple-Edge Silicone Spatula
Price from \$9.99



Silicone Spatula Set
Value \$25.00
CHEF's Price \$14.99



CHEF'S



Flexible Spatula Set



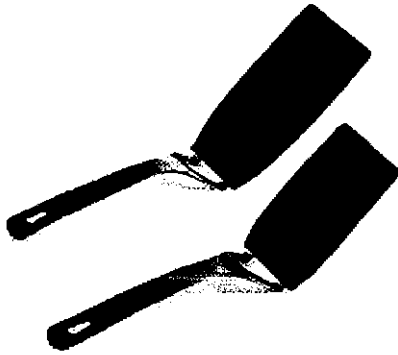
Kuhn Rikon



SEARCH

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COOKWARE	CUTLERY	KITCHEN ELECTRICS	KITCHEN TOOLS	BRANDS
BAKEWARE	ENTERTAINING	GIFTS & FOOD	HOUSEHOLD HELPERS	CLEAR
FREE STANDARD SHIPPING - NO MINIMUM! LIMITED TIME ▶				WHAT'S



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Flexible Spatula Set

Ultra-thin heat-resistant nylon head flexes to slip easily under pancakes, fried eggs, or delicate cookies to lift and flip without breaking. Set Includes one 10" and one 12". Brushed 18/10 stainless steel handles. Dishwasher safe. Imported.

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Item	Quantity	Inform:
Blue Flexible Spatula Set	<input type="text" value="0"/>	Status: In Sto
Item # 11379		• Gift Wrap Avail
Value: \$25.00		
CHEF'S Price: 14.99		



[Larger View](#)

Red Flexible Spatula Set	<input type="text" value="0"/>	Status: In Sto
Item # 11378		• Gift Wrap Avail
Value: \$25.00		
CHEF'S Price: 14.99		

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SEARCH

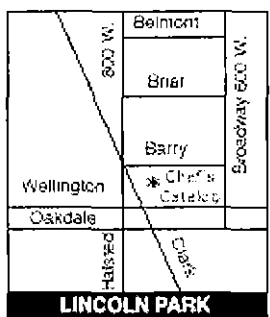
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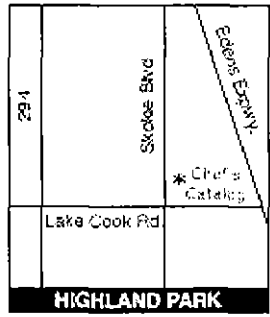
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We have two full-line retail stores in the Chicago area. Both offer the same terrific values you find on this Web site and in our catalogs, plus storewide sales and clearance events several times a year for extraordinary savings on a variety of first-quality merchandise.

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 773-327-5210



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 151-A Skokie Boulevard
 Highland Park, IL
 847-831-1100

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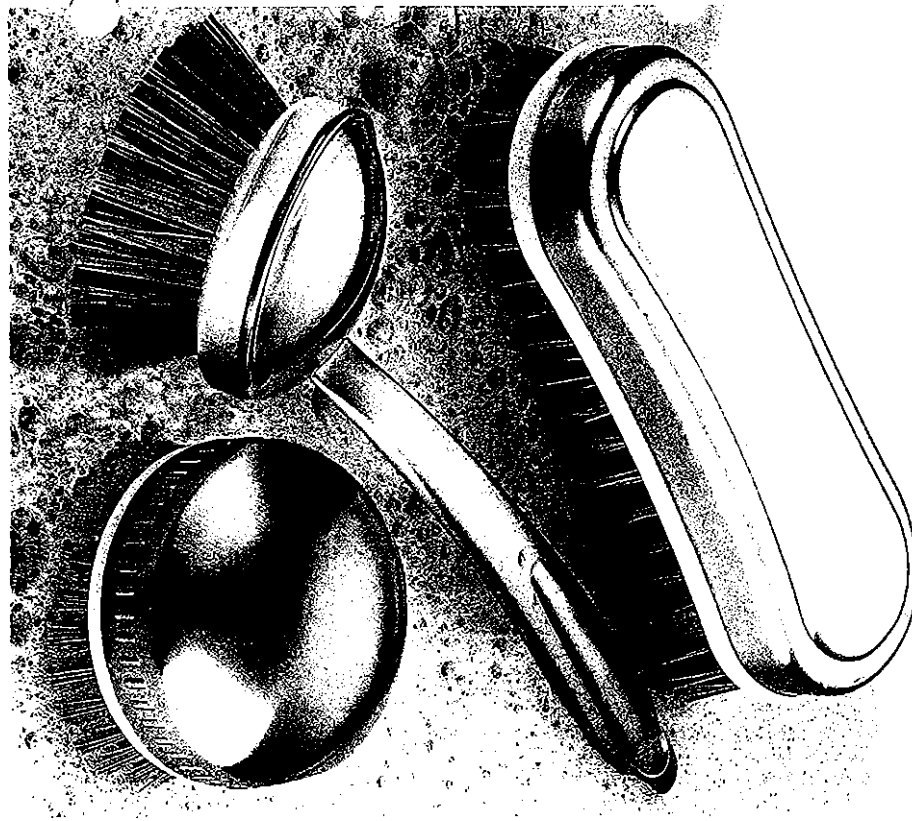
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Chicago
January 12-14, 2003

*Pictured: 8456, Long Handled Dish Brush; 8457, Scrubby Brush;
8458, Rectangular Hand Brush; Three traditional cleaning
brushes are now available in stainless steel.*

AMCO
HOUSEWORKS

EXHIBIT

tabbles®

B

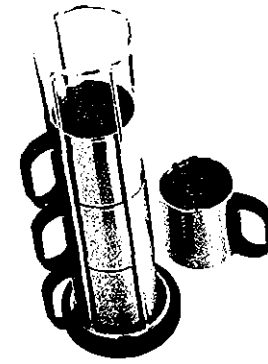
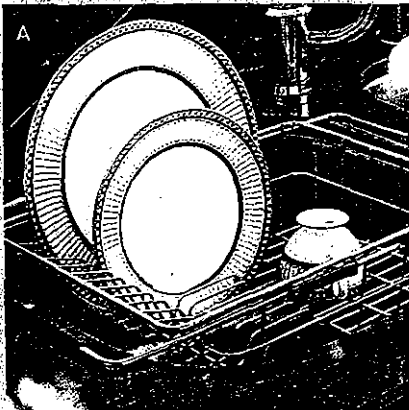
EXHIBIT C

A. SAVE \$10

OVER-THE-SINK DISH RACK

Let dishes dry right over the sink in this 18/10 stainless steel dish rack. Rack adjusts from 17½"L to 21½"L. 11"W x 4½"H. Imported.

2868 Dish Rack, value \$50.00, special 39.99



B. CHEF'S STACKING COFFEE MUGS

18/10 stainless steel 8-oz. mugs are double-insulated with stay-cool handles and countertop stand. 5"Dia. x 10"H when stacked. Imported.

9372 Four Stacking Mugs, 19.99

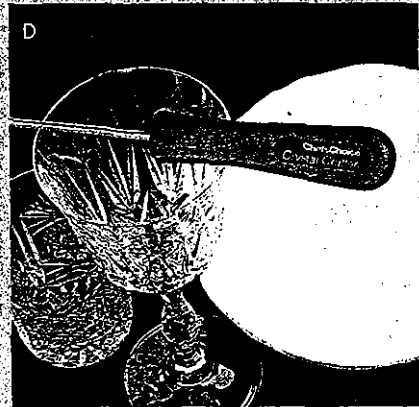
C. SAVE \$10-\$20

BONJOUR® BEVERAGE DISPENSER

The double-wall stainless steel construction (both interior and exterior) provides lasting durability and an unbreakable lining. Dispenser is vacuum insulated to keep beverages hot or cold.

2908 2½ Liter, value \$60.00, special 49.99

2909 3 Liter, value \$80.00, special 59.99



D. CHEF'S CHOICE® DIAMOND CRYSTAL CRAFTER™

This tool quickly and easily smoothes away imperfections on fine crystal, bone china, and other hard materials. With 100% diamond-coated. USA made.

7827 Diamond Crystal Crafter™, 19.99

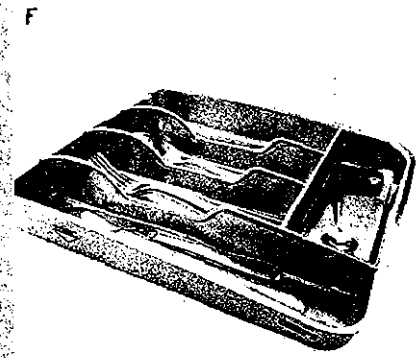
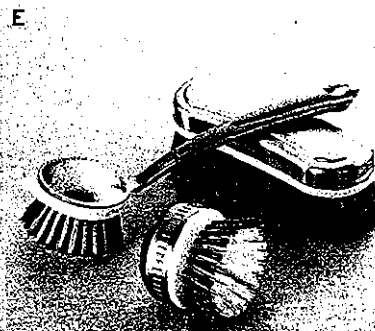
E. STAINLESS STEEL BRUSHES

Sleek brushes have stainless steel handles and nylon bristles that won't scratch nonstick surfaces. Go to chefscatalog.com for replacement brushes.

9450 Long-Handled Dish Brush, 9" x 2¼", 9.99

9451 Round Palm-Size Brush, 2½"Dia., 7.99

9452 Scrub Brush, 6" x 2¼", 9.99



F. STAINLESS STEEL FLATWARE TRAY

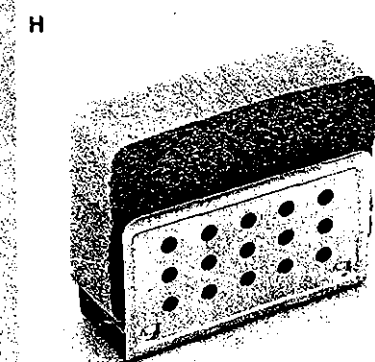
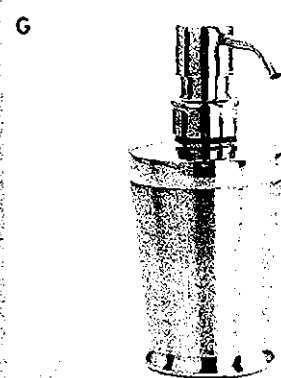
This durable 18/10 stainless steel tray has five compartments to separate utensils. Made in Italy. 13¼"L x 11¼"W x 2¼"D.

3288 Flatware Tray, 39.99

G. STAINLESS STEEL SOAP DISPENSER

Oval cylinder of contrasting brushed and polished 18/10 stainless steel is perfect for any style kitchen and can even be used for storing lotion by the sink. Holds 12 ounces.

9151 Soap Dispenser, 12.99



H. SPONGE CADDY & POP-UP SPONGES

18/8 stainless steel holder's pierced surface promotes air-drying, and the removable draining tray has gripper feet. Compressed sponges expand to full size when placed in water. Caddy is 5"W x 3"D and imported. Multicolored sponges are 5½" x 3½" x 1¼" when wet; made in France.

7644 Sponge Caddy, 7.99

8087 Six Pop-Up Sponges, 14.99

CE Chef's Exclusive items are available only from Chef's.

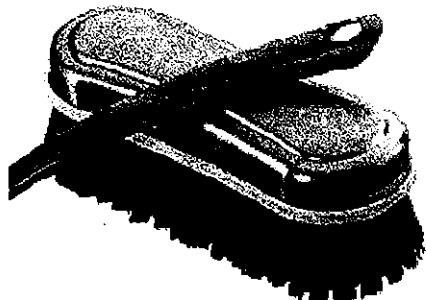




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Cleaning essentials that are handsome enough to leave in full view, stainless steel handles and nylon bristles that won't scratch nonstick!

- Long-handle brush for dishes, 9" x 2 1/4"
- Round palm-size brush, 2 1/2" Dia.
- Rectangular scrub brush, 6" x 2 1/4"

Item	Quantity	Info
 Stainless Steel Rectangular Brush Item # 9452 CHEF'S Price: 9.99	<input type="text" value="0"/>	In Stock • Gift Wrap 
Enlarge View  Stainless Steel Long-Handle Brush Item # 9450 CHEF'S Price: 9.99	<input type="text" value="0"/>	In Stock • Gift Wrap 
Enlarge View  Stainless Steel Scrub Brush Item # 9451 CHEF'S Price: 7.99	<input type="text" value="0"/>	In Stock • Gift Wrap 

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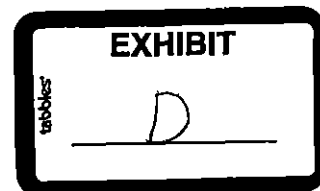
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**MICHAEL BEST
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100 East Wisconsin Avenue
Suite 3300
Milwaukee, Wisconsin 53202-4108
FAX (414) 277-0656
Telephone (414) 271-6560

Author: Martin L. Stem
Writer's Direct Line: (312) 661-2121
Email: mstem@mbf-law.com

Offices in:
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Manitowoc, Wisconsin
Waukesha, Wisconsin
Lehigh Valley, Pennsylvania
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May 6, 2003

Via Federal Express

Mr. Michael Lubka
President
Chef's Catalog
5950 Colwell Blvd.
Irving, Texas 75039-3100

Re: Amco Houseworks LLC/Chef's Catalog

Dear Mr. Lubka:

We represent Amco Houseworks, LLC in intellectual property matters. Our client advises us that Chef's Catalog is presently offering for sale certain stainless steel brushes as shown at page 90 of your Early Summer 2003 catalog that are either identical or virtually identical to three uniquely designed brushes of our client. A copy of page 90 from your catalog is enclosed. We understand that samples of our client's brushes were provided to you in January 2003, after you saw the brushes at the January Housewares Show and expressed an interest in buying them from our client and offering them for sale through your catalog.

Our client thus supplied these sample brushes to you in the expectation that Chef's Catalog would offer our client's product for sale through your catalog. Although product that looks to be identical to our client's three brushes has been included in your recent catalog, you have not ordered any product from our client. Apparently, you are using another source to supply these brushes for sale through your catalog.

Please identify the source of the sample brushes used for the photographs in your catalog and the source of the three brushes being sold through your catalog. We would also like to know what happened to the sample brushes our client provided to you, and request their return.

Amco Houseworks has pending three patent applications which were filed to protect its patent rights in the aforementioned brushes. Amco Houseworks intends to enforce any and all patent rights it acquires in these unique brushes.



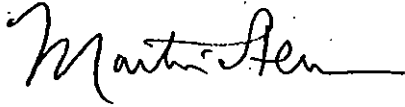
**MICHAEL BEST
& FRIEDRICH LLC**
Attorneys at Law

Mr. Michael Lubka
President
Chef's Catalog
Page 2

We look forward to your reply by May 19, 2003.

Sincerely,

MICHAEL BEST & FRIEDRICH LLP



Martin L. Stern

MLS:aps
Enclosures

cc: Julia Austein (w/enclosures)
Brendan Hoffman, Neiman Marcus Direct (w/enclosures)

A. SAVE \$10

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2868 Dish Rack, value \$50.00, special 39.99

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9372 Four Stacking Mugs, 19.99

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2909 3 Liter, value \$80.00, special 59.99

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Chef's Exclusive items are available only from Chef's.

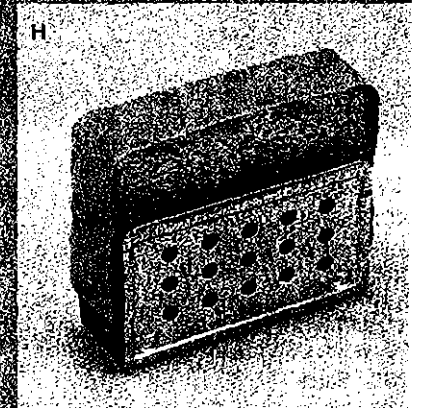
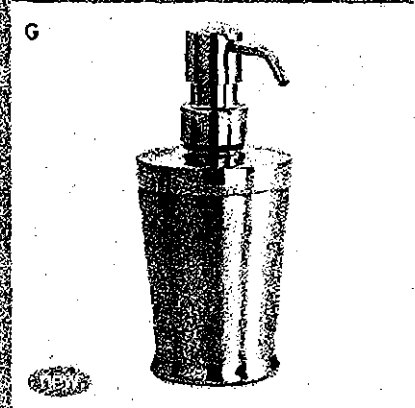
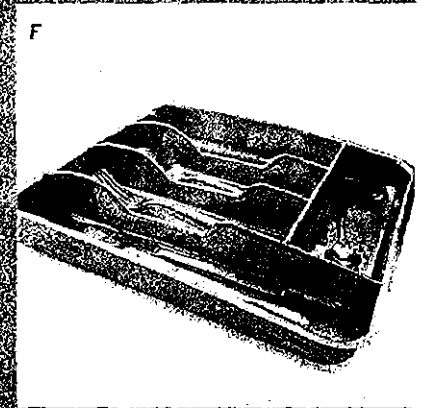
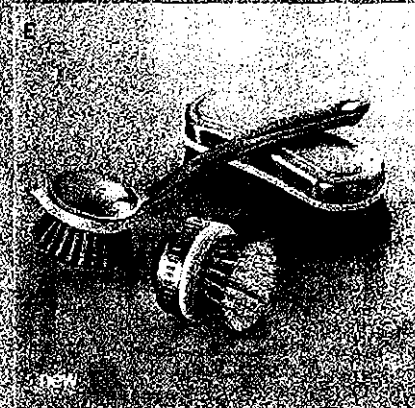
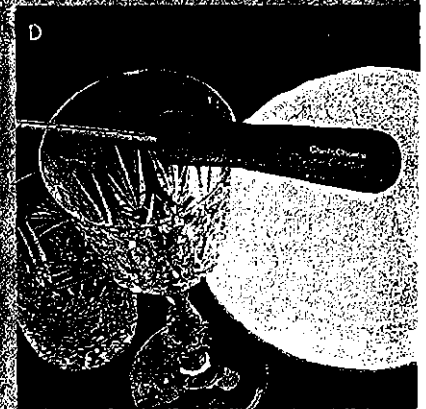
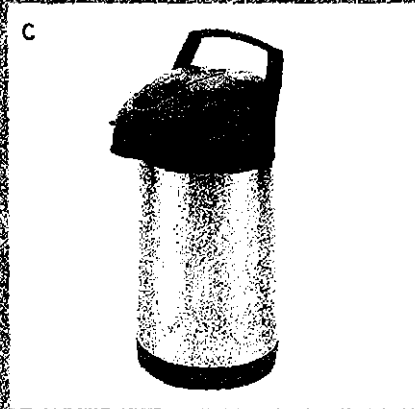
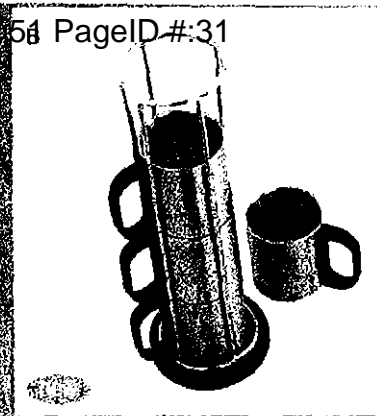
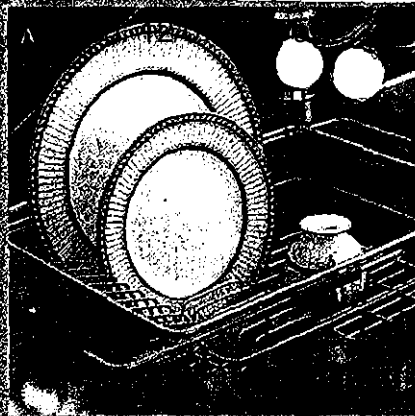


EXHIBIT F

**MICHAELBEST
& FRIEDRICH** LLC
Attorneys at Law

401 N. Michigan Avenue
Suite 1800
Chicago, Illinois 60611
Telephone (312) 661-2100
FAX (312) 661-0029
www.mbf-law.com

Offices In:
Milwaukee, Wisconsin
Madison, Wisconsin
Manitowoc, Wisconsin
Waukesha, Wisconsin
Lehigh Valley, Pennsylvania

Author: Martin L. Stern
Writer's Direct Line: (312) 661-2121
Email: mlstern@mbf-law.com

May 13, 2003

BY FEDERAL EXPRESS

Mr. Finlay Gow
General Counsel
Neiman Marcus Group
1618 Main Street
Dallas, TX 75201

Re: Amco Houseworks LLC/Chef's Catalog

Dear Mr. Gow:

We are writing on behalf of our client Amco Houseworks LLC about a matter concerning Chef's Catalog. On May 6, 2003, we wrote to Mr. Michael Lubka at Chef's Catalog about this situation. A copy of our letter to Mr. Lubka is enclosed. We have received no reply to date.

We are writing to bring you up to date on this matter and provide you with some additional information we have uncovered since writing to Mr. Lubka. Briefly, as explained in the enclosed letter to Mr. Lubka, Chef's Catalog used in its Early Summer 2003 catalog at page 90 photographs of three stainless steel brushes that appear identical to uniquely designed brushes of our client. A copy of page 90 is enclosed.

At the request of Julia Ford-Austein of Chef's Catalog, on Friday, January 10, 2003, our client sent to her by Federal Express for delivery on Monday, January 13 samples of the three stainless steel brushes at issue. The brushes were provided on an expedited basis at the request of Ms. Ford-Austein so that they could be quickly photographed in order to meet a January 15 deadline for inclusion in the catalog.

Amco Houseworks supplied the three sample brushes on the understanding that Chef's Catalog would offer our client's product for sale based on the photographs of the brushes used in the catalog. Chef's Catalog, however, has not ordered these products from our client. Rather, it is using another source and two of the three brushes (the Long-Handled Dish Brush - Item No. 9450 and the Scrub Brush -



**MICHAEL BEST
& FRIEDRICH LLC**
Attorneys at Law

Mr. Finlay Gow
Neiman Marcus Group
May 13, 2003
Page 2

Item No. 9452) are not even the brushes actually pictured in the catalog. In short, Chef's Catalog is offering our client's product, but supplying another's different product.

As we informed Mr. Lubka, Amco Houseworks has pending patent applications on the brushes at issue.

Chef's Catalog's inducing our client to provide the sample brushes so that the products could be photographed in time to meet the catalog deadline, and then using another source to supply the brushes, is wrong. We understand that such improper conduct is not the normal practice of Neiman Marcus. We would like to resolve this situation in an amicable business manner.

We look forward to your reply at your earliest convenience.

Sincerely,

MICHAEL BEST & FRIEDRICH LLC



Martin L. Stern

MLS/nkt
Enclosure

cc: Keith W. Jaffee
Michael Lubka (w/o encl.)

06/20/2003 18:28 FAX

NEIMAN MARCUS LEGAL DEPT

002/002

Kim Yee
Vice President
Compliance & Regulatory Law

VIA FACSIMILE

June 20, 2003

Martin L. Stern, Esq.
Michael Best & Friedrich
401 Michigan Avenue
Suite 1900
Chicago, IL 60611

The
Neiman
Marcus
Group

Re: *Stainless Steel Brushes*

Dear Mr. Stern:

One Marcus Square
1618 Main Street
Dallas, TX 75201
(214) 743-7618
Fax(214) 743-7617

As a follow up to my voicemail messages to you, I am still investigating the patent concerns set forth in your letters to Michael Lubka and Finlay Gow, dated respectively May 6, 2003 and May 13, 2003. Let me begin with stating that Chef's Catalog was not aware of any patent rights with respect to your client's stainless steel brushes at the time we began selling the brushes featured in the Chef's Catalog.

Since Chef's Catalog was not involved in the design nor manufacture of the brushes, your letter has been referred to the vendor from whom we purchased this item for resale to consumers. Under these circumstances, we believe that the vendor is the appropriate party to respond to the legal claims set forth in your letter, and we have advised the vendor to contact you immediately.

While I continue to complete my review of this matter with the vendor and my clients, Chef's Catalog has removed the brushes from our website and will not be featuring them in any future catalogs until this matter has been resolved. A further follow up report will be provided by me at a later date. In the interim, if you have any questions regarding this matter, please not hesitate to contact me.

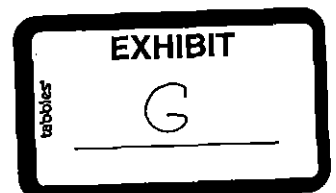
Yours very truly,



cc (via facsimile): Mike Lubka
Julia Ford-Austein

cc: Bruce E. O'Connor, Esq. (via facsimile)
Christensen O'Connor Johnson Kindness, PLLC
1420 Fifth Avenue
Suite 2800
Seattle, WA 98101-2347

KY:lgu





競業塑膠製品廠有限公司
SUPREME PLASTIC MANUFACTURING CO. LTD.

12/F., CHIAP LUEN IND. BLDG., 30-32, KUNG YIP ST., KWAI CHUNG, N.T., HONG KONG.
TEL.: (852) 2425 8131 FAX.: (852) 2420 2230

Ref 2004/SPM/FC/0041

19 August 2004

Michael Best & Friedrich LLP
401 N. Michigan Avenue
Suite 1900
Chicago, Illinois 60611
United States of America

Attention Mr Martin L. Stern

Dear Mr Stern,

We refer to your letter of 12 August 2004.

We have already acknowledged your three brushes through our exclusive US distributor MIU, LLC. in Seattle, Washington that they will cease all sales and exhaust their left over stock at their import cost to AMCO. Besides, MIU, LLC. will OEM all new developed product with AMCO and at the meantime guarantees not to copy any AMCO product in the future.

We are simply a OEM factory serving our customers' needs, please contact Mr Vincent Wong of MIU, LLC. at Seattle, Washington at (206) 605-1216 for any further information.

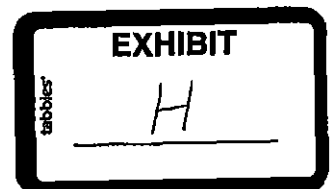
Yours faithfully

For and on behalf of
SUPREME PLASTIC MFG. CO., LTD.


.....
Authorized Signature

LAI Yu Keung
Director

LYK/fc



(12) **United States Design Patent** (10) **Patent No.:** **US D480,215 S**
Mastroianni (45) **Date of Patent:** **** Oct. 7, 2003**

- (54) **BRUSH**
- (75) **Inventor:** **Michael R. Mastroianni**, Barrington, IL (US)
- (73) **Assignee:** **AMCO Houseworks LLC**, Vernon Hills, IL (US)
- (**) **Term:** **14 Years**
- (21) **Appl. No.:** **29/176,604**
- (22) **Filed:** **Feb. 24, 2003**
- (51) **LOC (7) Cl.** **04-01**
- (52) **U.S. Cl.** **D4/118; D4/127; D4/138**
- (58) **Field of Search** **D4/118, 127, 132-134, D4/138; D7/393, 395, 401.2, 642, 688; 15/143.1, 159.1, 160, 186, 187, 191.1, 105, 111; D28/63; D32/42, 51; 16/430, 431**

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 Merry Chance Industries, Ltd. "Nylon Brush with S/S tube handle" (Aug. 24, 2001) Photo only.

* cited by examiner

Primary Examiner—Marcus A. Jackson
Assistant Examiner—Lavone D. Tabor
 (74) *Attorney, Agent, or Firm*—Michael, Best & Friedrich LLC

(57) **CLAIM**

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

DESCRIPTION

FIG. 1 is a front top perspective view of the brush;
 FIG. 2 is a top plan view of the brush;
 FIG. 3 is a right side elevation view of the brush;
 FIG. 4 is a bottom plan view of the brush;
 FIG. 5 is a rear elevation view of the brush;
 FIG. 6 is a front bottom perspective view of the brush; and,
 FIG. 7 is a left side elevation view of the brush.
 The broken-line showing of the brush bristles is environmental structure and for illustrative purposes only and forms no part of the claimed design.
 FIG. 1 is shown on a reduced scale.

1 Claim, 2 Drawing Sheets

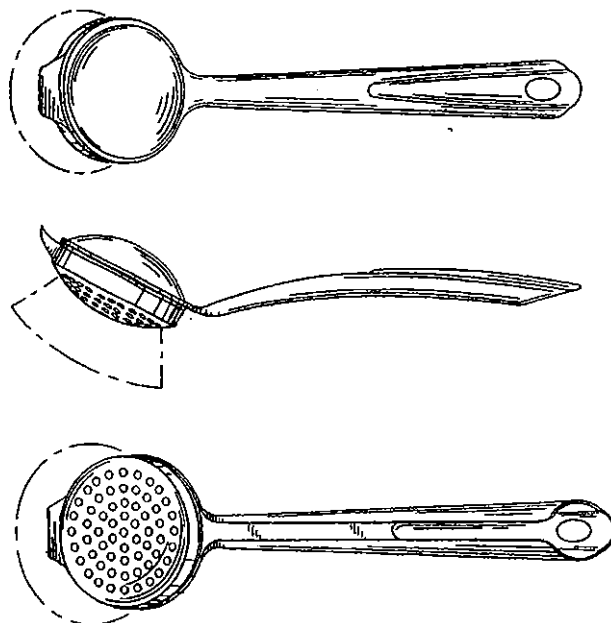


EXHIBIT
 I

U.S. Patent

Oct. 7, 2003

Sheet 1 of 2

US D480,215 S

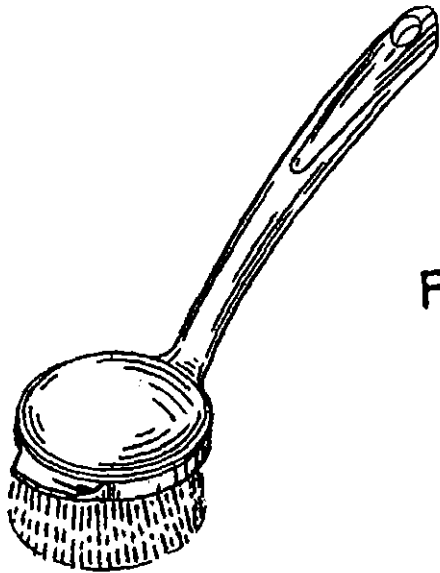


FIG. 1

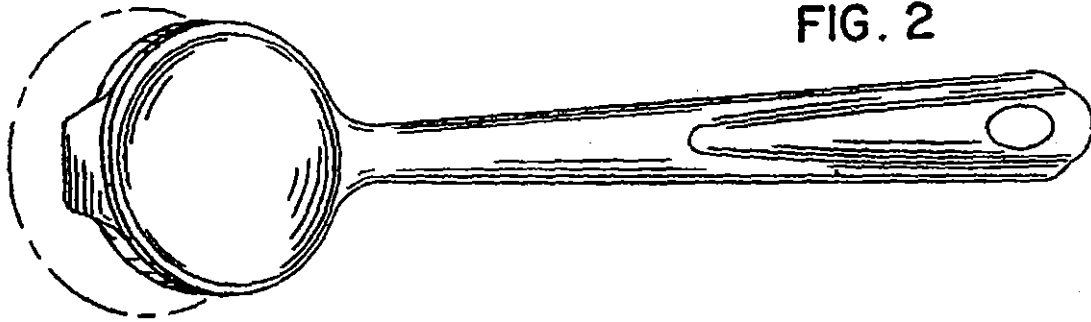


FIG. 2

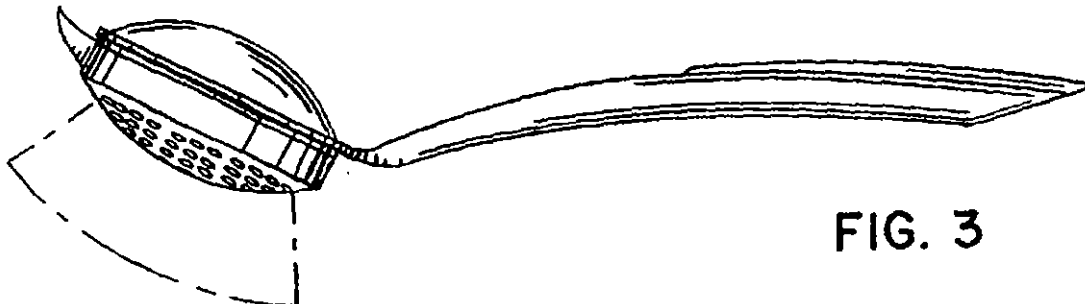


FIG. 3

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Sheet 2 of 2

US D480,215 S

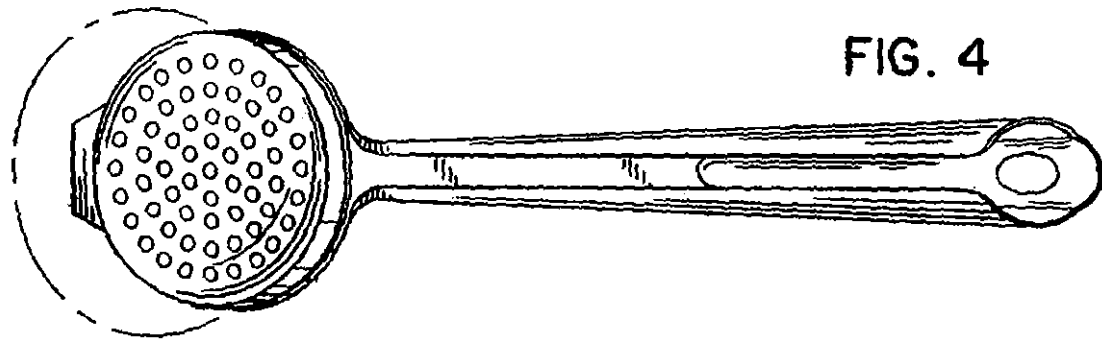


FIG. 4

FIG. 5

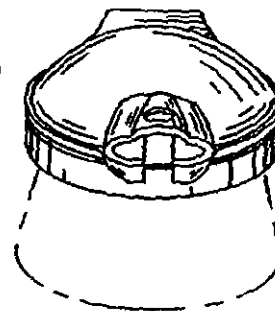


FIG. 6

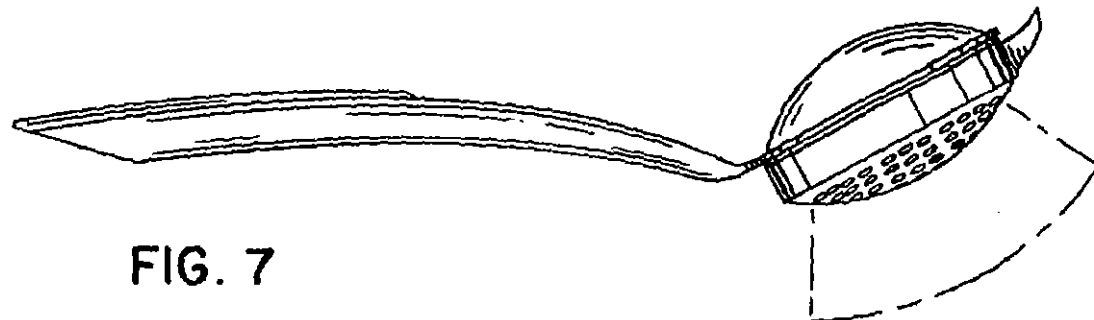
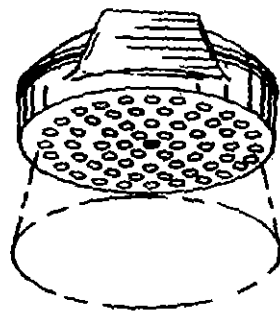


FIG. 7

(12) **United States Design Patent** (10) **Patent No.:** **US D480,219 S**
Mastroianni (45) **Date of Patent:** **** Oct. 7, 2003**

(54) **BRUSH**
 (75) **Inventor:** Michael R. Mastroianni, Barrington, IL (US)
 (73) **Assignee:** AMCO Houseworks, LLC, Vernon Hills, IL (US)
 (**) **Term:** 14 Years
 (21) **Appl. No.:** 29/176,560
 (22) **Filed:** Feb. 24, 2003
 (51) **LOC (7) Cl.** 04-01
 (52) **U.S. Cl.** D4/138; D4/130
 (58) **Field of Search** D4/130, 132, 135, D4/137, 138, 199; 15/143.1, 159.1, 160, 167.3, 186, 187, 191.1

OTHER PUBLICATIONS
 John Pritzlaff Hardware Co., Milwaukee, Wisconsin; © 1952, Item No. 22—Peach Scrubbing Brush, p. 1233.*
 OXO International, "OXO Good Grips Bar Brush", Mar. 2002, www.oxo.com (accessed May 15, 2003).
 Rubbermaid Home Products, 2002 "Scrub Brush G235-12", www.rubbermaid.com (accessed May 15, 2003).

* cited by examiner
Primary Examiner—Joel Sincavage
Assistant Examiner—Lavone D. Tabor
 (74) *Attorney, Agent, or Firm*—Michael, Best & Friedrich, LLC

(56) **References Cited**
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 1,847,668 A * 3/1932 Reh 15/159.1
 D255,088 S * 5/1980 Arbib D4/137 X
 D283,851 S 5/1986 Walko
 D285,131 S 8/1986 Wilkeson
 D366,670 S * 1/1996 Huh D4/137 X
 D429,890 S 8/2000 Tennant
 D441,961 S 5/2001 Gringer
 D459,589 S 7/2002 Farrage et al.
 D461,057 S 8/2002 Flores et al.

(57) **CLAIM**
 The ornamental design for a brush, as shown and described.

DESCRIPTION
 FIG. 1 is a front perspective view of the brush;
 FIG. 2 is a top plan view of the brush;
 FIG. 3 is a left side elevation view of the brush;
 FIG. 4 is a right side elevation view of the brush;
 FIG. 5 is a rear elevation view of the brush;
 FIG. 6 is a front elevation view of the brush; and,
 FIG. 7 is a bottom plan view of the brush.
 The broken-line showing of the brush bristles is environmental structure and for illustrative purposes only and forms no part of the claimed design.

FOREIGN PATENT DOCUMENTS
 DE 29809588 * 8/1998 A46B/11/02

1 Claim, 2 Drawing Sheets

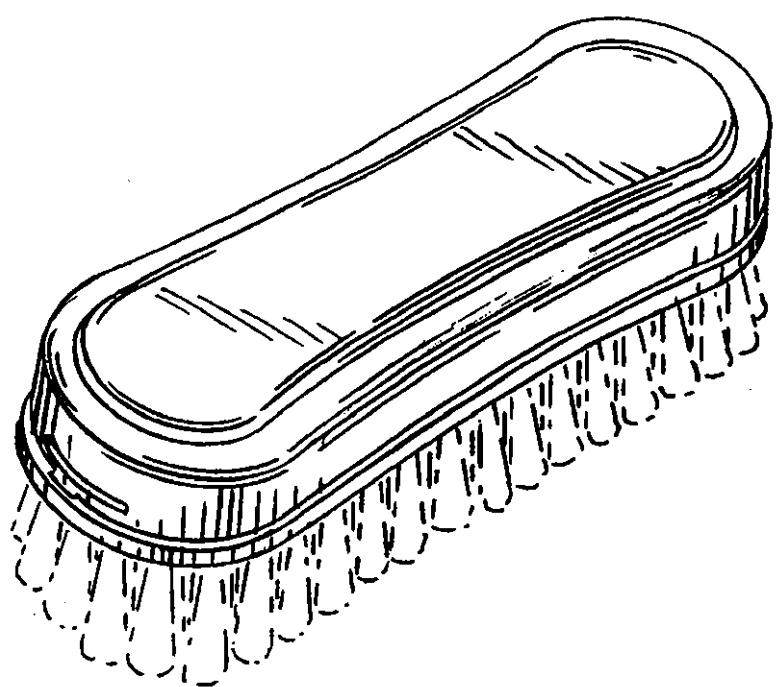


EXHIBIT
 J

U.S. Patent

Oct. 7, 2003

Sheet 1 of 2

US D480,219 S

FIG. 1

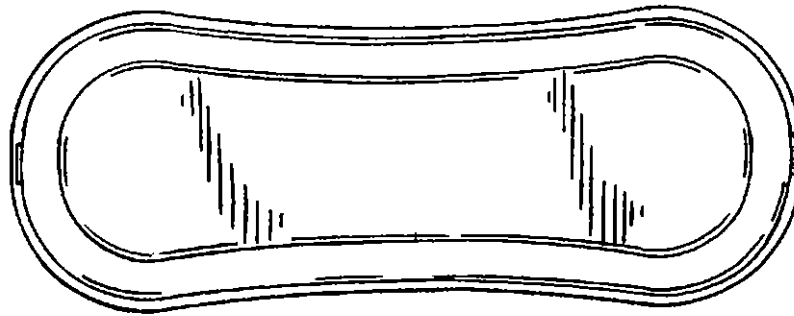
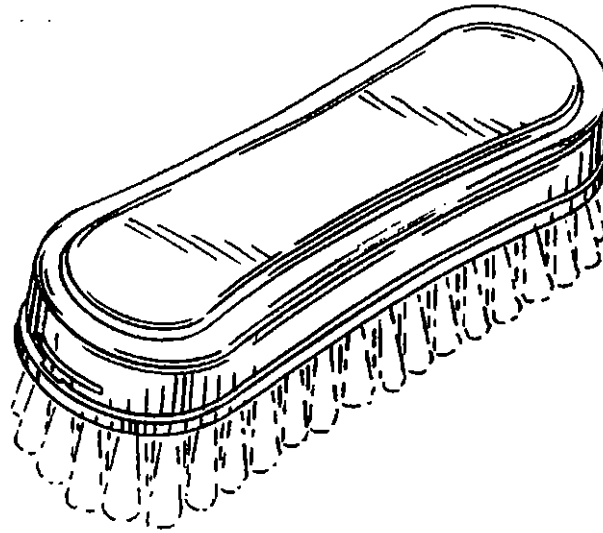


FIG. 2

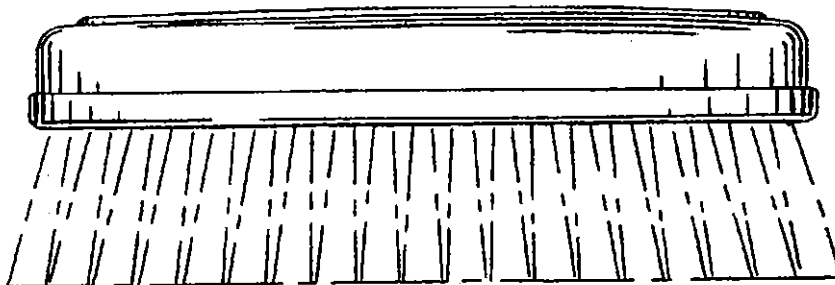


FIG. 3

U.S. Patent

Oct. 7, 2003

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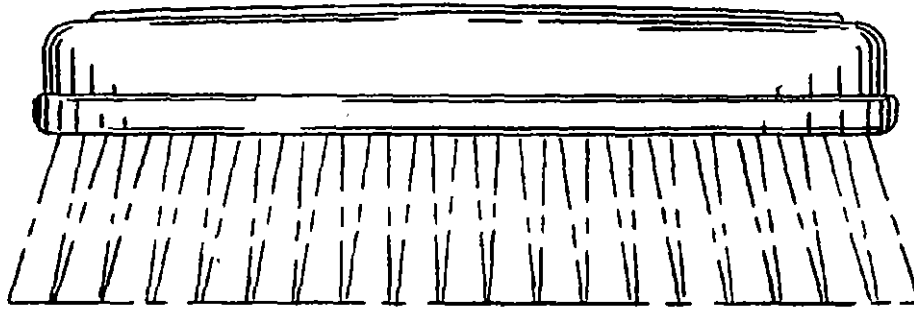


FIG. 4

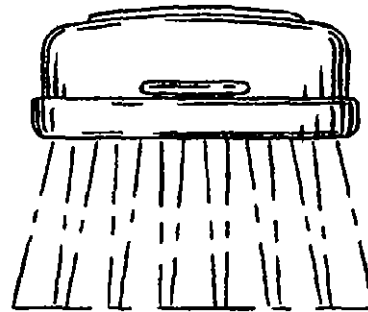


FIG. 5

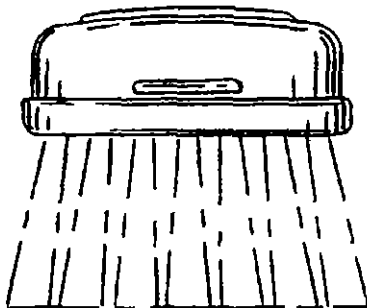


FIG. 6

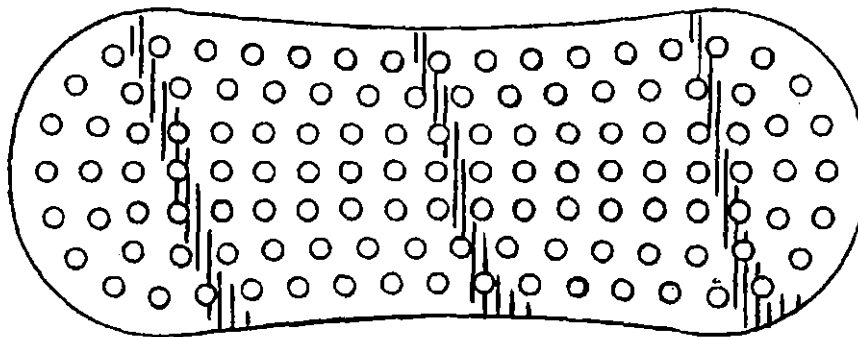


FIG. 7



USO 80878S

(12) **United States Design Patent**
Mastroianni

(10) **Patent No.:** US D480,878 S
 (45) **Date of Patent:** ** Oct. 21, 2003

(54) **BRUSH**

D439,052 S 3/2001 Hay
 D442,369 S 5/2001 Damiano

(75) **Inventor:** Michael R. Mastroianni, Barrington, IL (US)

OTHER PUBLICATIONS

(73) **Assignee:** Amco Houseworks LLC, Vernon Hills, IL (US)

Cooking.com, "Black Handled Flexible Mushroom Brush (2-in.) Good Grips by Oxo", www.cooking.com (accessed May 15, 2003).

(**) **Term:** 14 Years

* cited by examiner

(21) **Appl. No.:** 29/176,603

Primary Examiner—Pamela Burgess

(22) **Filed:** Feb. 24, 2003

Assistant Examiner—Lavone D. Tabor

(51) **LOC (7) Cl.** 04-01

(74) *Attorney, Agent, or Firm*—Michael, Best & Friedrich LLC

(52) **U.S. Cl.** D4/127; D4/138

(57) **CLAIM**

(58) **Field of Search** D4/127, 130, 133, D4/135, 138, 199; 15/143.1, 159.1, 160, 186, 187, 191.1; 401/6, 184; 601/137, 154; D28/63; D32/52

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

DESCRIPTION

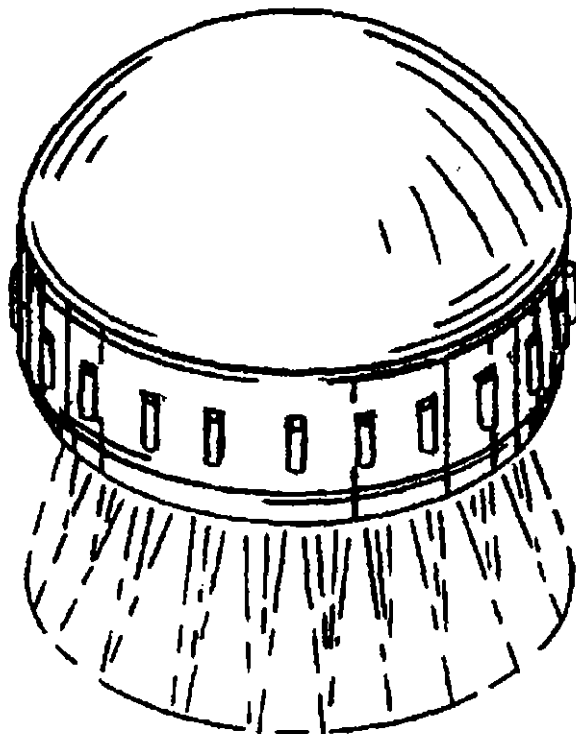
(56) **References Cited**

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D326,778 S		6/1992	Vetter	
D362,965 S		10/1995	Tastanis	
D438,013 S		2/2001	Hay	

FIG. 1 is a front perspective view of the brush;
 FIG. 2 is a top plan view of the brush;
 FIG. 3 is a side elevation view of the brush, the other side views being identical; and,
 FIG. 4 is a bottom plan view of the brush.
 The broken-line showing of the brush bristles is environmental structure and for illustrative purposes only and forms no part of the claimed design.

1 Claim, 1 Drawing Sheet



U.S. Patent

Oct. 21, 2003

US D480,878 S

FIG. 1

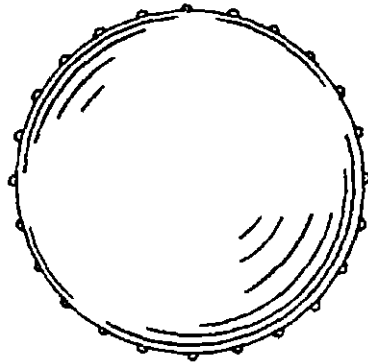
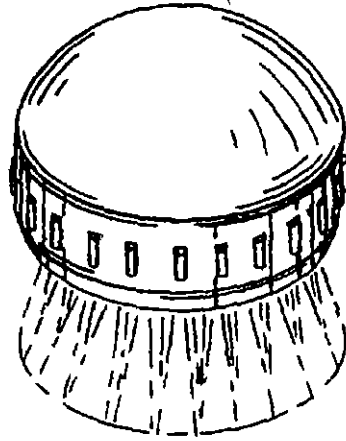


FIG. 2

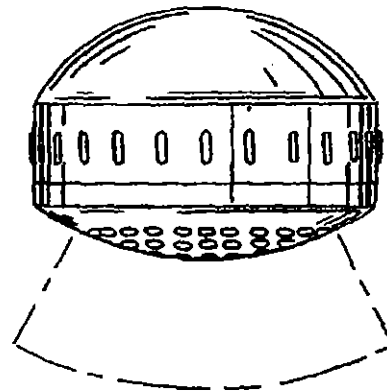


FIG. 3

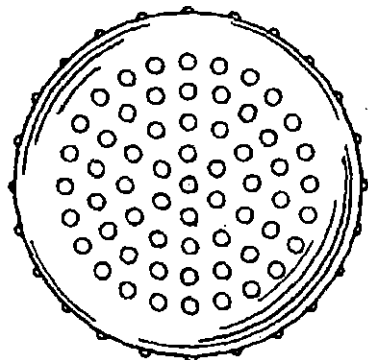


FIG. 4

FILED-ED4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

DOCKETED

2004 DEC -7 PM 2:58

DEC 08 2004

Civil Cover Sheet

CLERK

This form conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

Plaintiff(s): AMCO HOUSEWORKS, LLC,
an Illinois limited liability company

Defendant(s): PIKES PEAK DIRECT
MARKETING, INC., d.b.a CHEF's
CATALOG, a Colorado corporation

County of Residence: Lake County

County of Residence: El Paso County

Plaintiff's Atty: Charles A. Laff

Defendant's Atty:

Michael Best & Friedrich LLP

401 N. Michigan Avenue, Ste.

1900, Chicago, IL 60611

(312) 222-0800

04C 7911

II. Basis of Jurisdiction: 3. Federal Question (U.S. not a party)

III. Citizenship of Principal Parties (Diversity Cases Only)

JUDGE GOTTSCHALL

Plaintiff:-4 IL corp or Principal place of Bus. in IL
Defendant:-5 Non IL corp and Principal place of Business outside IL

MAGISTRATE JUDGE MASON

IV. Origin : 1. Original Proceeding

V. Nature of Suit: 830 Patent

VI. Cause of Action: Federal patent infringement under 35 U.S.C. §§ 1-376, false advertising, unfair competition (15 U.S.C. § 1125(a), the Illinois Deceptive Trade Practices Act (815 ILCS 510/1 et seq.) and the Illinois Consumer Fraud and Deceptive Business Practices Act (815 ILCS 505/1 et seq.) and common law.

VII. Requested in Complaint

Class Action: No

Dollar Demand:

Jury Demand: Yes

VIII. This case IS NOT a refiling of a previously dismissed case.

Signature: Judith L. Schubert
Date: 12/7/04

Revised: 06/28/00

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

FILED-ED4

DOCKETED

In the Matter of

AMCO HOUSEWORKS, LLC,
Plaintiff,

2004 DEC -7 PM 2:58

Case Number:

DEC 08 2004

v.
PIKES PEAK DIRECT MARKETING, INC., d/b/a/ CHEF'S CATALOG,
Defendant.

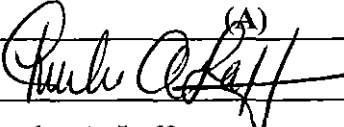
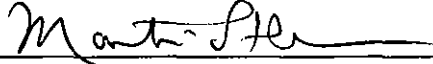
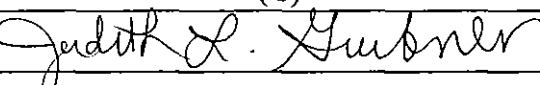
CLERK
U.S. DISTRICT COURT

04C 7911
JUDGE GOTTSCHALL

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

AMCO HOUSEWORKS, LLC, Plaintiff

MAGISTRATE JUDGE MASON

(A)		(B)	
SIGNATURE 		SIGNATURE 	
NAME Charles A. Laff		NAME Martin L. Stern	
FIRM Michael Best & Friedrich LLP		FIRM same as (A)	
STREET ADDRESS 401 North Michigan Avenue, Suite 1900		STREET ADDRESS same as (A)	
CITY/STATE/ZIP Chicago, IL 60611		CITY/STATE/ZIP same as (A)	
TELEPHONE NUMBER (312) 222-0800	FAX NUMBER (312) 222-0818	TELEPHONE NUMBER (312) 222-0800	FAX NUMBER (312) 222-0818
E-MAIL ADDRESS calaff@mbf-law.com		E-MAIL ADDRESS mlstern@mbf-law.com	
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(C)		(D)	
SIGNATURE 		SIGNATURE 	
NAME Judith L. Grubner		NAME Brian J. Lum	
FIRM same as (A)		FIRM same as (A)	
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E-MAIL ADDRESS jlgrubner@mbf-law.com		E-MAIL ADDRESS bjlum@mbf-law.com	
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