

FILED

UNITED STATES DISTRICT COURT
for the
MIDDLE DISTRICT OF FLORIDA
12 APR -9 AM 11:43
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

James R. Taylor,

Plaintiff

vs.

Case No. 8:12-cv-746-T-17AEP

Taylor Made Plastics, Inc.,

Defendant.

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, James R. Taylor, files this Complaint against defendant, Taylor Made Plastics, Inc., and alleges as follows:

1. This claim arises under the United States patent laws, 35 U.S.C. § 1, et seq. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).
2. Defendant has regularly engaged in business in this State and District in Sarasota, Florida. Venue is proper in this District.
3. On September 15, 1998, United States Letters Patent No. 5,806,566, was issued to the plaintiff for a storm drainage conduit plug and sealing band. Plaintiff owned the patent throughout the period of the defendant's infringing acts and still owns the patent.
4. The defendant has infringed and is still infringing the Letters Patent by making, selling and using plugs that embody the patented invention, and the defendant will continue to do so unless enjoined by this court.


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5. The plaintiff has given the defendant written notice of this infringement.

Therefore, the plaintiff demands:

- (a) a preliminary and final injunction against the continuing infringement;
- (b) an accounting for damages; and
- (c) interest and costs.

Date: 4-9-12


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