

III. JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the United States Patent Act, 35 U.S.C. §1, *et seq.* This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§1331 and 1338.

5. This Court has general personal jurisdiction over Jasco because it has maintained systematic and continuous business contacts with the State of Texas. Additionally, this Court has specific personal jurisdiction over Jasco because it has committed acts of patent infringement in the State of Texas by offering for sale and selling products, including but not limited to its Dual Swivel HDMI Adapter, HDMI 180° Swivel Adapter, 6-foot HDMI Cable with 180° Swivel Head, and 12-foot Cable with 180° Swivel Head, that infringe one or more claims of two United States Patents owned by Ideative.

6. Jasco engages in business in Texas but it has not designated or maintained a resident agent to receive service of process in the State of Texas. Thus, pursuant to V.T.C.A., Tex. Civ. Prac. & Rem. Code §17.044, Jasco may be served with process by delivering a true and correct copy of this petition, together with an original citation, to the Secretary of State for the State of Texas, 1019 Brazos Street, Austin, Texas 78701. Upon receipt of the citation and the copy of the petition, the Secretary of State will forward process to Jasco's registered agent for receipt of process, David V. Stewart, 10 W. Memorial Road, Oklahoma City, Oklahoma 73114-23-2, via certified mail, return receipt requested.

7. This Court is a proper venue for this case pursuant to 28 U.S.C. §1391 because Jasco has committed acts of infringement in this District and Division.

IV. FACTS

8. On February 24, 2009, United States Patent Number 7,494,343 B2 (the “’343 Patent”) entitled “Multiple Degrees Of Freedom Connectors And Adapters” was duly issued to Ideative, as assignee of the inventor, Schriefer. A true and correct copy of the ‘343 Patent is attached to this complaint as Exhibit A.

9. Jasco offers for sale and sells in Texas and throughout the world one or more devices, including its Dual Swivel HDMI Adapter, HDMI 180° Swivel Adapter, it 6-foot HDMI Cable with 180° Swivel Head, and it 12-foot Cable with 180° Swivel Head, that infringe one or more claims of the ‘028 Patent and the ‘343 Patent.

V. CAUSE OF ACTION

COUNT I

(Infringement of U.S. Patent No. 7,494,343 B2)

10. Ideative incorporates the allegations of paragraphs 1 through 9 as if fully reproduced herein.

11. The ‘343 Patent is valid and enforceable.

12. Ideative owns all right, title and interest in and to the ‘343 Patent.

13. Jasco has infringed and continues to infringe one or more claims of the ‘343 Patent.

14. As a direct result of Jasco’s infringement, Ideative has incurred and will continue to incur damages, irreparable harm, and impairment of its patent rights.

15. Ideative is entitled to recover from Jasco the damages sustained by Ideative as a result of Jasco’s wrongful acts in an amount to be proven at trial.

VI. PRAYER

For the foregoing reasons, Plaintiff, Ideative, requests that Defendant be cited to answer herein and that, upon hearing hereof, the Court award the following relief:

- a. Entering judgment in favor of Ideative;
- b. Awarding damages in an amount to be determined at trial;
- c. Enjoining the Defendant from any further infringement of Ideative's Patents;
- d. Awarding Ideative its costs incurred in connection with the prosecution of its claims; and
- e. Awarding Ideative any and all other relief to which it may be entitled.

Dated: May 8, 2012

Respectfully Submitted,

By: *s/James E. Davis*

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