

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

JAMIE LEGLER, a Wisconsin resident)	
Plaintiff,)	
)	Case No.
v.)	
)	
)	Judge:
SPIN MASTER LTD.,)	
Defendant.)	JURY TRIAL DEMANDED
_____)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, JAMIE LEGLER, for its Complaint against Spin Master Ltd. alleges as follows:

THE PARTIES

1. Plaintiff, Jamie Legler, (“Legler”) is an individual residing at W246N6717 Champeny Ct., Sussex, Wisconsin.
2. Defendant, Spin Master Ltd. (“Spin Master”) is a corporation with offices located in New York City, New York and Ontario, Canada.

JURISIDCTION AND VENUE

3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §1331 (federal question), §1332 (a) (diversity of citizenship), and §1338(a) (question related to patents).
4. Venue is proper in this judicial district pursuant to 28 U.S.C. §1391 and §1400.

FACTS GIVING RISE TO PATENT INFRINGEMENT

5. Legler worked at day care center in Menomonee Falls, Wisconsin. During that time Legler invented a transportable sleep mat and pillow.

6. The United States Patent Office issued United States Patent No. D440,806 that covers Legler's transportable sleep mat and pillow ("Legler Patent").

7. Legler is the sole owner of the Legler Patent.

8. Spin Master manufactures and sells transportable sleep mats and pillows in this District, including its "Ready Bed" that infringe Legler's Patent under 35 U.S.C. § 271(a).

WHEREFORE, Legler prays that a judgment be entered in its favor and against Spin Master as follows:

- (a) Spin Master infringes U.S. Patent D440,806 under 35 U.S.C. §271;
- (b) Spin Master's infringement has been willful;
- (c) Legler be awarded damages pursuant to 35 U.S.C. §284;
- (d) Legler be awarded prejudgment interest;
- (e) Legler be awarded increased damages pursuant to 35 U.S.C. §284;
- (f) Legler be awarded its attorney fees pursuant to 35 U.S.C. §285; and
- (g) any further and just relief the Court deems equitable and appropriate.

Dated: June 1, 2012

Respectfully submitted,
JAMIE LEGLER

By: _____
Lee F. Grossman
Mark M. Grossman
Grossman Law Office
1834 Walden Office Square
Fifth Floor
Schaumburg, IL 60173

