

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

OUT RAGE LLC,

Plaintiff,

v.

NEW ARCHERY PRODUCTS
CORPORATION,

Defendant.

Civil Action No. 11-CV-701

FIRST AMENDED COMPLAINT

Plaintiff Out RAGE LLC (“Out RAGE”) files this First Amended Complaint against Defendant New Archery Products Corporation (“NAP”):

NATURE OF THE ACTION

1. This is an action brought against NAP for: (i) infringement of U.S. Patent No. 6,626,776 (“the ’776 patent”), No. 6,669,586 (“the ’586 patent”), and No. 6,942,588 (“the ’588 patent”); (ii) cancellation of NAP’s “KILLZONE” trademark; and (iii) declaratory judgment for no liability for certain claims NAP has lodged against Out RAGE under federal and Illinois state law relating to patent infringement, trademark infringement, false advertising, and unfair competition.

THE PARTIES

2. Out RAGE is a limited-liability company organized and existing under the laws of the State of Delaware, with its principal place of business located at 1230 Poplar Avenue, Superior, WI 54880.

3. NAP is a corporation organized and existing under the laws of the State of Illinois, with its principal place of business located at 7500 Industrial Drive, Forest Park, IL 60130.

JURISDICTION

4. The Court has subject-matter jurisdiction over Counts One through Three pursuant to 28 U.S.C. §§ 1331 and 1338(a). The Court has subject-matter jurisdiction over Counts Four through Sixteen pursuant to 28 U.S.C. §§ 2201 *et seq.*, 28 U.S.C. §§ 1331 and 1338(a), 15 U.S.C. § 1121, 28 U.S.C. § 1367, and the pendent jurisdiction of the Court.

5. This Court has personal jurisdiction over NAP.

6. NAP has conducted and continues to conduct business in the State of Wisconsin and in this Judicial District. NAP, directly and/or through third-party manufacturers, makes or assembles devices that fall within one or more claims of the '776 patent, the '586 patent, and the '588 patent (“the NAP Infringing Devices”) and that are and have been offered for sale, sold, purchased, and used within the Western District of Wisconsin. NAP, directly or through intermediaries (including distributors, retailers, and others), ships, distributes, offers for sale, sells, and advertises the NAP Infringing Devices in the Western District of Wisconsin. NAP has purposefully and voluntarily sold one or more of the NAP Infringing Devices to consumers in the Western District of Wisconsin via the website <http://www.newarchery.com>. The NAP Infringing Devices have been and continue to be purchased by consumers in the Western District of Wisconsin. Additionally, NAP, directly and/or through distribution networks, regularly places the NAP Infringing Devices within the stream of commerce, with the knowledge and/or understanding that such products will be sold in the Western District of Wisconsin. NAP has committed acts of patent infringement within the State of Wisconsin and, more particularly, within the Western District of Wisconsin. NAP has purposefully availed itself of the benefits of the State of Wisconsin, and the exercise of jurisdiction over NAP would not offend traditional notions of fair play and substantial justice.

VENUE

7. Venue is proper in the Western District of Wisconsin under 28 U.S.C. §§ 1391(b) and 1400(b), because acts and transactions constituting at least a subset of the violations alleged herein occurred in this Judicial District and because NAP conducts

business in this Judicial District. Venue is also proper in this Judicial District under 28 U.S.C. § 1391(c) because NAP is subject to personal jurisdiction in this District.

THE ACCUSED PRODUCTS

8. NAP makes, uses, offers to sell, sells, and/or imports into the United States broadheads having blades that expand upon striking and entering a target (“the NAP Broadheads”). The NAP Broadheads include, without limitation, broadheads sold under various model names including the designation “Bloodrunner 2-Blade” or “Bloodrunner” (collectively, “the Bloodrunner Broadheads”), broadheads sold under various model names including the designation “Killzone” (collectively, “the Killzone Broadheads”), and broadheads sold under various model names including the designation “Thunderhead” (collectively, the “Thunderhead Broadheads”).

THE '776 PATENT

9. On September 30, 2003, the '776 patent was duly and legally issued by the United States Patent and Trademark Office. A copy of the '776 patent is attached hereto as “Exhibit A” and made a part hereof.

10. The '776 patent includes one independent claim and seven dependent claims. The claims are directed to “[a] broadhead having expanding blades, expanding upon striking and entering a target.” *See, e.g.*, '776 patent, claim 1.

11. The '776 patent is valid and enforceable.

12. Out RAGE is the owner of the '776 patent and has the right to enforce the '776 patent.

NAP'S INFRINGEMENT OF THE '776 PATENT

13. NAP is liable for direct infringement of one or more of the claims of the '776 patent, including, without limitation, Claim 1 of the '776 patent, under 35 U.S.C. § 271(a) because it has made, used, sold, offered for sale, and/or imported into the United States the Bloodrunner Broadheads and Killzone Broadheads.

14. NAP was aware of the '776 patent prior to the filing of this Complaint.

15. NAP has continued to make, use, offer for sale, sell, and/or import into the United States the NAP Broadheads despite an objectively high likelihood that its actions constituted infringement of a valid patent. The objectively high likelihood that NAP's actions constituted infringement of a valid patent is based on, among other things, communications between Out RAGE and NAP regarding the '776 patent.

16. The risk that NAP's actions constituted infringement of a valid patent was either known to NAP or was so obvious that it should have been known to NAP.

THE '586 PATENT

17. On December 30, 2003, the '586 patent was duly and legally issued by the United States Patent and Trademark Office. A copy of the '586 patent is attached hereto as "Exhibit B" and made a part hereof.

18. The '586 patent includes two independent claims and eighteen dependent claims. The claims are directed to "[a] broadhead being attachable to an arrow shaft," *see* '586 patent, claims 1–10, and "[a] method of operating an expandable broadhead," *see id.*, claims 11–20.

19. The '586 patent is valid and enforceable.

20. Out RAGE is the owner of the '586 patent and has the right to enforce the '586 patent.

NAP'S INFRINGEMENT OF THE '586 PATENT

21. NAP is liable for direct infringement of one or more of the claims of the '586 patent, including, without limitation, Claim 1 of the '586 patent, under 35 U.S.C. § 271(a) because it has made, used, sold, offered for sale, and/or imported into the United States the Killzone Broadheads.

THE '588 PATENT

22. On September 13, 2005, the '588 patent was duly and legally issued by the United States Patent and Trademark Office. A copy of the '588 patent is attached hereto as "Exhibit C" and made a part hereof.

23. The '588 patent includes three independent claims and twenty-three dependent claims. The claims are directed to “[a] broadhead for use with an arrow,” *see* '588 patent, claims 1–22, and “[a] method of forming a broadhead for use with an arrow,” *see id.*, claims 23–26.

24. The '588 patent is valid and enforceable.

25. Out RAGE is the owner of the '588 patent and has the right to enforce the '588 patent.

NAP'S INFRINGEMENT OF THE '588 PATENT

26. NAP is liable for direct infringement of one or more of the claims of the '588 patent, including, without limitation, Claim 1 of the '588 patent, under 35 U.S.C. § 271(a) because it has made, used, sold, offered for sale, and/or imported into the United States the Thunderhead Broadheads.

COUNT ONE: INFRINGEMENT OF THE '776 PATENT

27. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

28. NAP has infringed and/or continues to infringe one or more claims of the '776 patent as set forth above, including, without limitation, Claim 1 of the '776 patent. NAP is liable for direct infringement of the '776 patent pursuant to 35 U.S.C. § 271(a).

29. Out RAGE has suffered damage by reason of NAP's infringement and will continue to suffer additional damage unless and until this Court enjoins the infringing conduct.

30. NAP has continued its infringing activities after receiving notice of the '776 patent, thus making such infringement willful and entitling Out RAGE to the recovery of increased damages under 35 U.S.C. § 284.

31. NAP's actions with regard to the '776 patent make this an “exceptional case” justifying an award of attorneys' fees and costs to Out RAGE under 35 U.S.C. § 285.

32. Out RAGE believes that NAP will continue to infringe the '776 patent unless enjoined by this Court. Such infringing activity causes Out RAGE irreparable harm and will continue to cause such harm without the issuance of an injunction.

**COUNT TWO:
INFRINGEMENT OF THE '586 PATENT**

33. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

34. NAP has infringed and/or continues to infringe one or more claims of the '586 patent as set forth above, including, without limitation, Claim 1 of the '586 patent. NAP is liable for direct infringement of the '586 patent pursuant to 35 U.S.C. § 271(a).

35. Out RAGE has suffered damage by reason of NAP's infringement and will continue to suffer additional damage unless and until this Court enjoins the infringing conduct.

36. NAP's actions with regard to the '586 patent make this an "exceptional case" justifying an award of attorneys' fees and costs to Out RAGE under 35 U.S.C. § 285.

37. Out RAGE believes that NAP will continue to infringe the '586 patent unless enjoined by this Court. Such infringing activity causes Out RAGE irreparable harm and will continue to cause such harm without the issuance of an injunction.

**COUNT THREE:
INFRINGEMENT OF THE '588 PATENT**

38. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

39. NAP has infringed and/or continues to infringe one or more claims of the '588 patent as set forth above, including, without limitation, Claim 1 of the '588 patent. NAP is liable for direct infringement of the '588 patent pursuant to 35 U.S.C. § 271(a).

40. Out RAGE has suffered damage by reason of NAP's infringement and will continue to suffer additional damage unless and until this Court enjoins the infringing conduct.

41. NAP's actions with regard to the '588 patent make this an "exceptional case" justifying an award of attorneys' fees and costs to Out RAGE under 35 U.S.C. § 285.

42. Out RAGE believes that NAP will continue to infringe the '588 patent unless enjoined by this Court. Such infringing activity causes Out RAGE irreparable harm and will continue to cause such harm without the issuance of an injunction.

**COUNT FOUR:
INVENTORSHIP OF THE '776 PATENT**

43. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

44. NAP claims that its employee Robert Mizek is an inventor of the '776 patent.

45. NAP has asserted a counterclaim against Out RAGE for correction of inventorship under 35 U.S.C. § 256 to include Robert Mizek as a named inventor of the '776 patent.

46. Out RAGE disputes that Robert Mizek is an inventor of the '776 patent.

47. An actual controversy exists between Out RAGE and NAP regarding the inventorship of the '776 patent.

48. Out RAGE is entitled to a declaration that Robert Mizek is not an inventor of the '776 patent.

**COUNT FIVE:
CANCELLATION OF THE "KILLZONE" TRADEMARK**

49. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

50. NAP claims to be the owner of a trademark to the term "KILLZONE," registered on the Principal Register on April 3, 2007 for "Archery goods, namely, arrowheads and broadheads."

51. NAP has asserted a counterclaim against Out RAGE for trademark infringement under the Lanham Act based on Out RAGE's use of the term "kill zone" in the generic and/or merely descriptive sense. Thus, an actual controversy exists between Out RAGE and NAP regarding the validity and/or enforceability of the "KILLZONE" trademark.

52. The "KILLZONE" trademark is invalid because it was obtained contrary to the requirements of 15 U.S.C. § 1052. The "KILLZONE" trademark is also invalid because it is generic and/or is merely descriptive of the goods and services with which it is used.

53. An actual controversy exists between Out RAGE and NAP regarding the validity of NAP's "KILLZONE" trademark.

54. Out RAGE is entitled to a declaration that the "KILLZONE" trademark is invalid and should be cancelled.

**COUNT SIX:
NO TRADEMARK INFRINGEMENT UNDER THE LANHAM ACT**

55. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

56. NAP has asserted a counterclaim against Out RAGE for trademark infringement under the Lanham Act based on its alleged ownership of a trademark for the term "KILLZONE," U.S. Registration 3,225,800, for "Archery goods, namely, arrowheads and broadheads," contending, *inter alia*, that Out RAGE infringes this mark through its use of the slogan "EXPAND YOUR KILL ZONE."

57. Out RAGE has not committed trademark infringement under the Lanham Act.

58. An actual controversy exists between Out RAGE and NAP regarding alleged trademark infringement under the Lanham Act.

59. Out RAGE is entitled to a declaration that it has not committed trademark infringement under the Lanham Act.

**COUNT SEVEN:
NON-INFRINGEMENT OF THE '252 PATENT**

60. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

61. U.S. Patent No. 6,174,252 (“the ’252 patent”) was issued by the United States Patent and Trademark Office on January 16, 2001. NAP claims to be the owner and assignee of the ’252 patent.

62. NAP has asserted a counterclaim that Out RAGE infringes one or more claims of the ’252 patent. Out RAGE denies these allegations. Thus, an actual controversy exists between Out RAGE and NAP regarding the alleged infringement of the claims of the ’252 patent.

63. Out RAGE has not directly infringed, contributed to infringement, or induced infringement of any valid claim of the ’252 patent, nor is Out RAGE directly infringing, contributing to infringement, or inducing infringement of any valid claim of the ’252 patent.

64. Out RAGE is entitled to a declaration that the ’252 patent is not, and has not been, infringed by Out RAGE.

**COUNT EIGHT:
INVALIDITY OF THE '252 PATENT**

65. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

66. Each of the asserted claims of the ’252 patent is invalid for failing to satisfy the conditions of patentability set forth in Part II of Title 35 of the United States Code, including, but not limited to, Sections 102 and 103.

67. NAP has asserted a counterclaim that Out RAGE infringes the ’252 patent. Thus, an actual controversy exists between Out RAGE and NAP regarding the alleged validity of the ’252 patent.

68. Out RAGE is entitled to a declaration that each of the asserted claims of the '252 patent is invalid.

**COUNT NINE:
NON-INFRINGEMENT OF THE '784 PATENT**

69. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

70. U.S. Patent No. 5,941,784 ("the '784 patent") was issued by the United States Patent and Trademark Office on January 16, 2001. NAP claims to be the owner and assignee of the '784 patent.

71. NAP has asserted a counterclaim that Out RAGE infringes one or more claims of the '784 patent, which Out RAGE denies. Thus, an actual controversy exists between Out RAGE and NAP regarding the alleged infringement of the claims of the '784 patent.

72. Out RAGE has not directly infringed, contributed to infringement, or induced infringement of any valid claim of the '784 patent, nor is Out RAGE directly infringing, contributing to infringement, or inducing infringement of any valid claim of the '784 patent.

73. Out RAGE is entitled to a declaration that the '784 patent is not, and has not been, infringed by Out RAGE.

**COUNT TEN:
INVALIDITY OF THE '784 PATENT**

74. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

75. Each of the asserted claims of the '784 patent is invalid for failing to satisfy the conditions of patentability set forth in Part II of Title 35 of the United States Code, including, but not limited to, Sections 102 and 103.

76. NAP has asserted a counterclaim that Out RAGE infringes the '784 patent. Thus, an actual controversy exists between Out RAGE and NAP regarding the alleged validity of the '784 patent.

77. Out RAGE is entitled to a declaration that each of the asserted claims of the '784 patent is invalid.

**COUNT ELEVEN:
NON-INFRINGEMENT OF THE '676 PATENT**

78. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

79. U.S. Patent No. 6,398,676 ("the '676 patent") was issued by the United States Patent and Trademark Office on January 16, 2001. NAP claims to be the owner and assignee of the '676 patent.

80. NAP has asserted a counterclaim that Out RAGE infringes one or more claims of the '676 patent, which Out RAGE denies. Thus, an actual controversy exists between Out RAGE and NAP regarding the alleged infringement of the claims of the '676 patent.

81. Out RAGE has not directly infringed, contributed to infringement, or induced infringement of any valid claim of the '676 patent, nor is Out RAGE directly infringing, contributing to infringement, or inducing infringement of any valid claim of the '676 patent.

82. Out RAGE is entitled to a declaration that the '676 patent is not, and has not been, infringed by Out RAGE.

**COUNT TWELVE:
INVALIDITY OF THE '676 PATENT**

83. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

84. Each of the asserted claims of the '676 patent is invalid for failing to satisfy the conditions of patentability set forth in Part II of Title 35 of the United States Code, including, but not limited to, Sections 102 and 103.

85. NAP has asserted a counterclaim that Out RAGE infringes the '676 patent. Thus, an actual controversy exists between Out RAGE and NAP regarding the alleged validity of the '676 patent.

86. Out RAGE is entitled to a declaration that each of the asserted claims of the '676 patent is invalid.

**COUNT THIRTEEN:
UNENFORCEABILITY OF THE ASSERTED PATENTS
DUE TO LACHES AND ESTOPPEL**

87. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

88. On information and belief, NAP was aware of Out RAGE's sale of the allegedly infringing products since at least 2007, but unreasonably and inexcusably delayed filing this litigation, thereby causing Out RAGE economic and evidentiary harm.

89. NAP has asserted counterclaims that Out RAGE infringes the '252 patent, '784 patent, and the '676 patent (collectively, "the NAP asserted patents"). Thus, an actual controversy exists between Out RAGE and NAP regarding alleged infringement of the NAP asserted patents.

90. Out RAGE is entitled to a declaration that the NAP asserted patents are unenforceable under the doctrines of equitable estoppel and/or laches.

**COUNT FOURTEEN:
NO UNFAIR COMPETITION UNDER THE LANHAM ACT**

91. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

92. NAP has asserted a counterclaim against Out RAGE for unfair competition under the Lanham Act, contending, *inter alia*, that Out RAGE's use of the slogan

“EXPAND YOUR KILL ZONE” constitutes a false description and representation that Out RAGE’s goods are authorized by, sponsored by, or affiliated with NAP in violation of 15 U.S.C. § 1125(a).

93. Out RAGE has not committed unfair competition under the Lanham Act.

94. An actual controversy exists between Out RAGE and NAP regarding alleged unfair competition under the Lanham Act.

95. Out RAGE is entitled to a declaration that it has not committed unfair competition under the Lanham Act.

**COUNT FIFTEEN:
NO VIOLATION OF ILLINOIS UNFAIR COMPETITION AND DECEPTIVE
TRADE PRACTICES LAW REGARDING USE OF THE TERM “KILL ZONE”**

96. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

97. NAP has asserted a counterclaim against Out RAGE for violation of Illinois unfair competition and deceptive trade practices law through Out RAGE’s use of the slogan “EXPAND YOUR KILL ZONE,” contending, *inter alia*, that Out RAGE intentionally used the “KILL ZONE” term in this slogan with the deliberate and express purpose of obtaining the benefit of the goodwill and reputation of NAP.

98. Out RAGE has not violated Illinois unfair competition and deceptive trade practices law regarding use of the term “kill zone.”

99. An actual controversy exists between Out RAGE and NAP regarding the alleged violation of Illinois unfair competition and deceptive trade practices law regarding use of the term “kill zone.”

100. Out RAGE is entitled to a declaration that it has not violated Illinois unfair competition and deceptive trade practices law.

**COUNT SIXTEEN:
NO FALSE ADVERTISING UNDER THE LANHAM ACT**

101. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

102. NAP has asserted a counterclaim against Out RAGE for false advertising under the Lanham Act, based on, *inter alia*, Out RAGE's product packaging and/or advertisements.

103. Out RAGE has not committed false advertising under the Lanham Act.

104. An actual controversy exists between Out RAGE and NAP regarding alleged false advertising under the Lanham Act.

105. Out RAGE is entitled to a declaration that it has not committed false advertising under the Lanham Act.

**COUNT SEVENTEEN:
NO VIOLATION OF ILLINOIS UNFAIR COMPETITION AND
DECEPTIVE TRADE PRACTICES LAW REGARDING FALSE ADVERTISING**

106. Out RAGE incorporates the foregoing paragraphs by reference as if fully set forth herein.

107. NAP has accused Out RAGE of false advertising in violation of Illinois unfair competition and deceptive trade practices law, contending, *inter alia*, that Out RAGE has, in connection with its advertising and promotion, misrepresented the nature and qualities of NAP's broadheads (including the Spitfire® mechanical broadhead, Hellrazor® fixed-blade broadhead, and Thunderhead® fixed-blade broadhead).

108. Out RAGE denies that it has committed false advertising under Illinois unfair competition and deceptive trade practices law. Thus, an actual controversy exists between Out RAGE and NAP regarding alleged violation of Illinois unfair competition and deceptive trade practices law.

109. Out RAGE is entitled to a declaration that it has not committed false advertising under Illinois unfair competition and deceptive trade practices law.

DEMAND FOR JURY TRIAL

110. Out RAGE hereby demands a jury trial on all issues so triable.

PRAYER

Out RAGE requests that the Court find in its favor and against NAP, and that the Court grant the following relief:

- A. Judgment that one or more of the claims of the '776 patent have been infringed by NAP, either literally or under the doctrine of equivalents;
- B. Judgment that one or more of the claims of the '586 patent have been infringed by NAP, either literally or under the doctrine of equivalents;
- C. Judgment that one or more of the claims of the '588 patent have been infringed by NAP, either literally or under the doctrine of equivalents;
- D. Judgment in favor of Out RAGE for the full amount of its actual damages caused by NAP's infringing activities, including an assessment of interest and costs;
- E. Judgment for increased damages for willful infringement under 35 U.S.C. § 284;
- F. Judgment that NAP be permanently enjoined from further activity or conduct that infringes the claims of the '776 patent, the '586 patent, and/or the '588 patent;
- G. Judgment that the "KILLZONE" trademark be cancelled;
- H. Judgment that Out RAGE has not and does not infringe any claim of the '252 patent, directly or indirectly, literally or by equivalents;
- I. Judgment that Out RAGE has not and does not infringe any claim of the '784 patent, directly or indirectly, literally or by equivalents;
- J. Judgment that Out RAGE has not and does not infringe any claim of the '676 Patent, directly or indirectly, literally or by equivalents;

- K. Judgment that each and every asserted claim of the '252 patent is invalid;
- L. Judgment that each and every asserted claim of the '784 patent is invalid;
- M. Judgment that each and every asserted claim of the '676 patent is invalid;
- N. Judgment that the '252 patent, '784 patent, and '676 patent are unenforceable under the doctrines of equitable estoppel and laches;
- O. Judgment that Out RAGE has not committed trademark infringement under the Lanham Act;
- P. Judgment that Out RAGE has not committed unfair competition under the Lanham Act;
- Q. Judgment that Out RAGE has not violated Illinois unfair competition and deceptive trade practices law;
- R. Judgment that Out RAGE has not committed false advertising under the Lanham Act;
- S. Judgment that Out RAGE has not violated Illinois unfair competition and deceptive trade practices law regarding false advertising;
- T. Judgment that Out RAGE be awarded costs, together with reasonable attorneys' fees and all other expenses for this suit, because this case is exceptional under 35 U.S.C. § 285 and/or 15 U.S.C. § 1117;
- U. Judgment that Out RAGE be awarded costs, together with reasonable attorneys' fees and all other expenses for this suit under 28 U.S.C. § 2202, the Federal Rules of Civil Procedure, and any other applicable federal and state laws; and
- V. Judgment that Out RAGE may recover any and all other relief as is just and proper under the circumstances.

DATE: March 2, 2012

Respectfully Submitted,

/s/ R. Jason Fowler

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