

FILED

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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

Attorneys for Plaintiff  
DE GRISOGONO, S.A.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

DE GRISOGONO, S.A.,

Plaintiff,

vs.

PARIS HILTON ENTERTAINMENT, INC., a  
California corporation; PARLUX LTD., a New  
York corporation; CROSSBOW  
INTERNATIONAL CORP., a Florida  
corporation; PASCAL SAVOY, an individual;  
and DOES 1-10 ,

Defendants.

Case No.

**CV11-9022-SVW**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

(RZ)

Plaintiff de Grisogono, S.A. ("de GRISOGONO"), for its complaint against defendants Paris Hilton Entertainment, Inc. ("Paris Hilton Entertainment"), Parlux Ltd. ("Parlux"), Crossbow International Corp. ("Crossbow"), and Pascal Savoy ("Mr. Savoy") (collectively "Defendants"), founded upon federal question jurisdiction, alleges as follows:

**NATURE OF THE ACTION**

1. This is an action by de GRISOGONO for patent infringement in violation of 35 U.S.C. §§ 100 *et seq.* arising out of Defendants' infringement of United States Patent Numbers D596,052 (the "'052 patent") and D627,673 (the "'673 patent") (together, the "Patents-in-Suit,"

1 attached hereto as Exhibits A and B, respectively) through Defendants' manufacture, use, offer for  
2 sale and/or sale of a Paris Hilton-branded ("PARIS HILTON") "Coussin" wristwatch (the "Accused  
3 Product") that features the same protected design elements covered by the Patents-in-Suit. The  
4 Accused Product has been and/or is offered for sale and sold through various websites, including  
5 www.parishilton.com, www.paris-hilton-watches.com, and www.gevrilgroup.com, among others.

#### 6 **PARTIES**

7 2. De GRISOGONO is a Switzerland corporation with a principal place of business at  
8 176 Bis Route de Saint Julien CH-1228, Plan-Les-Ouates, Switzerland.

9 3. Upon information and belief, Paris Hilton Entertainment is a California corporation  
10 with a principal place of business at 2934 1/2 Beverly Glen Circle, Suite 383, Bel Air, California  
11 90077. Upon information and belief, Paris Hilton Entertainment licenses the PARIS HILTON  
12 trademark and owns, operates, and/or controls the websites www.parishilton.com and www.paris-  
13 hilton-watches.com through which the Accused Product has been and/or is sold.

14 4. Upon information and belief, Parlux is a New York corporation with a principal  
15 place of business at 5900 N. Andrews Avenue, Suite 500, Fort Lauderdale, Florida 33309. Upon  
16 information and belief, Parlux was an exclusive licensee of Paris Hilton Entertainment and,  
17 pursuant to the terms of its agreement with Paris Hilton Entertainment, designed, manufactured and  
18 sold PARIS HILTON watches, including the Accused Product.

19 5. Upon information and belief, Mr. Savoy is an individual residing in Florida. Upon  
20 information and belief, Mr. Savoy has possession and/or control of websites that offer for sale  
21 and/or sell PARIS HILTON watches, including Paris Hilton Entertainment websites  
22 www.parishilton.com and www.paris-hilton-watches.com, and acts at the direction of Paris Hilton  
23 Entertainment and/or its licensees in offering for sale and/or selling PARIS HILTON watches.

24 6. Upon information and belief, Crossbow is a Florida corporation with a principal  
25 place of business at 347 North New River Drive East, Suite 1104, Fort Lauderdale, Florida 33301.  
26 Upon information and belief, Crossbow is a consulting company that specializes in designing,  
27 marketing and selling watches and other luxury products. Upon information and belief, Mr. Savoy  
28 is the founder and president of Crossbow and provides consulting services through Crossbow.

**JURISDICTION AND VENUE**

7. This Court has subject matter jurisdiction over de GRISOGONO's claims pursuant to 28 U.S.C. §§ 1331, 1338(a), 1338(b), and 15 U.S.C. §1121 because the claims arise under the United States patent laws, 35 U.S.C. §§ 100 *et seq.*

8. This Court has personal jurisdiction over Paris Hilton Entertainment because it is a California corporation and maintains a principal place of business within the Central District of California. Among other things, on information and belief, Paris Hilton Entertainment licenses the PARIS HILTON trademark to one or more licensees to design, manufacture, and sell the PARIS HILTON line of watches, including the Accused Product, and owns, operates and/or controls websites through which the Accused Product has been and/or is sold, including [www.parishilton.com](http://www.parishilton.com) and [www.paris-hilton-watches.com](http://www.paris-hilton-watches.com).

9. This Court has personal jurisdiction over Parlux because it has sufficient minimum contacts with the State of California to establish specific jurisdiction and has purposefully availed itself of the privileges of conducting business in the state of California and in the Central District of California. Among other things, on information and belief, Parlux was an exclusive licensee of Paris Hilton Entertainment and, pursuant to the terms of its agreement with Paris Hilton Entertainment, designed, manufactured and sold PARIS HILTON watches, including the Accused Product. Additionally, upon information and belief, Parlux offered for sale and/or sold the Accused Product through [www.parishilton.com](http://www.parishilton.com) and/or [www.paris-hilton-watches.com](http://www.paris-hilton-watches.com).

10. This Court has personal jurisdiction over Mr. Savoy because he has sufficient minimum contacts with the State of California to establish specific jurisdiction and has purposefully availed himself of the privileges of conducting business in the state of California and in the Central District of California. Among other things, on information and belief, Mr. Savoy has possession and/or control of websites that offer for sale and/or sell PARIS HILTON watches, including Paris Hilton Entertainment websites [www.parishilton.com](http://www.parishilton.com) and [www.paris-hilton-watches.com](http://www.paris-hilton-watches.com), and acts at the direction of Paris Hilton Entertainment and/or its licensees in offering for sale and/or selling PARIS HILTON watches.

11. This Court has personal jurisdiction over Crossbow because it has sufficient minimum contacts with the State of California to establish specific jurisdiction and has purposefully availed itself of the privileges of conducting business in the state of California and in the Central District of California. Among other things, on information and belief, Crossbow has possession and/or control of websites that offer for sale and/or sell PARIS HILTON watches, including Paris Hilton Entertainment websites [www.parishilton.com](http://www.parishilton.com) and [www.paris-hilton-watches.com](http://www.paris-hilton-watches.com), and acts at the direction of Paris Hilton Entertainment and/or its licensees in offering for sale and/or selling PARIS HILTON watches.

12. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c) and 1400(b), because, upon information and belief, all Defendants are subject to personal jurisdiction in the State of California.

## BACKGROUND

13. De GRISOGONO is a designer, manufacturer, and distributor of fine jewelry, luxury timepieces, and accessory products sold under the de GRISOGONO brand name.

14. Since 2007, de GRISOGONO has manufactured and sold the Instrumento Novantatre wristwatch. The term “Novantatre” is Italian for “93” and refers to the numerals “9” and “3” featured prominently on the watch’s face. The watch also features a square-shaped case.

15. To protect its unique design, de GRISOGONO applied for and obtained the Patents-in-Suit.

16. The '052 patent was duly and legally issued by the United States Patent and Trademark Office (the "USPTO") on July 14, 2009 to Fawaz Gruosi after full and fair examination for the ornamental design of a watch dial. The '052 patent protects, *inter alia*, the square-shaped casing design of a watch.

17. The '052 patent is valid and enforceable.

18. The '673 patent was duly and legally issued by the USPTO on November 23, 2010 to Fawaz Gruosi after full and fair examination for the ornamental design of a watch dial. The '673 patent protects, *inter alia*, the ornamental design of a watch dial.

19. The '673 patent is valid and enforceable.

1           20. By assignment, de GRISOGONO is the owner of all right, title and interest in and to  
2 the Patents-in-Suit, including all rights to enforce and prosecute actions for infringement and to  
3 collect damages for all relevant times against infringers of the Patents-in-Suit. Accordingly, de  
4 GRISOGONO possesses the exclusive right and standing to prosecute the present action for  
5 infringement of the Patents-in-Suit by Defendants.

6           21. On information and belief, each and all of the Defendants have manufactured, made,  
7 marketed, sold, and/or used watches comprising all of the elements and limitations of one or more  
8 designs of the Patents-in-Suit, and therefore each and all of the Defendants have infringed the Patents-  
9 in-Suit and/or have induced and/or contributed to the infringement of the Patents-in-Suit by others.

10           22. More specifically, and on information and belief, Paris Hilton Entertainment has  
11 licensed the PARIS HILTON trademark to one or more licensees to design, manufacture, and sell  
12 the PARIS HILTON line of watches. On information and belief, Paris Hilton Entertainment  
13 exercises control over designs utilized for PARIS HILTON merchandise, including PARIS  
14 HILTON watches, including the Accused Product. The Accused Product features the same  
15 protected design elements covered by the Patents-in-Suit.

16           23. The Accused Product was and/or is offered for sale and sold through various  
17 websites, including [www.parishilton.com](http://www.parishilton.com), [www.paris-hilton-watches.com](http://www.paris-hilton-watches.com), and  
18 [www.gevrilgroup.com](http://www.gevrilgroup.com), among others.

19           24. De GRISOGONO is informed and believes that Paris Hilton Entertainment owns  
20 and/or controls the websites located at [www.parishilton.com](http://www.parishilton.com) and [www.paris-hilton-watches.com](http://www.paris-hilton-watches.com)  
21 and that the Accused Product has been offered for sale and/or sold through these and other websites  
22 with the consent and at the encouragement of Paris Hilton Entertainment.

23           25. De GRISOGONO is informed and believes that Parlux was an exclusive licensee of  
24 Paris Hilton Entertainment and, pursuant to the terms of its agreement with Paris Hilton  
25 Entertainment, designed, manufactured and sold PARIS HILTON watches, including the Accused  
26 Product.

27           26. De GRISOGONO is informed and believes that Mr. Savoy has possession and/or  
28 control of the Paris Hilton Entertainment websites [www.parishilton.com](http://www.parishilton.com) and [- 5 -](http://www.paris-hilton-</a></p></div><div data-bbox=)

1 watches.com and acts at the direction of Paris Hilton Entertainment and/or its licensees in offering  
2 for sale and/or selling the Accused Product.

3 27. De GRISIGONO is informed and believes that Crossbow has possession and/or  
4 control of the Paris Hilton Entertainment websites www.parishilton.com and www.paris-hilton-  
5 watches.com and acts at the direction of Paris Hilton Entertainment and/or its licensees in offering  
6 for sale and/or selling the Accused Product.

7 28. Defendants have received actual notice of de GRISOGONO's rights in the Patents-  
8 in-Suit, including through the multiple letters that de GRISOGONO has sent to Defendants.

9 **FIRST CLAIM FOR RELIEF**

10 **(INFRINGEMENT OF U.S. PATENT D596,052 AGAINST ALL DEFENDANTS)**

11 29. De GRISOGONO repeats and realleges each and every allegation set forth in  
12 paragraphs one through twenty-four as if fully set forth herein.

13 30. Defendants are presently making, using, offering for sale and/or selling items  
14 (including without limitation the Accused Product) that infringe the ornamental design for a watch  
15 disclosed by the '052 patent, literally or under the doctrine of equivalents.

16 31. Defendants are also presently inducing or contributing to the infringement of the  
17 '052 patent.

18 32. De GRISOGONO has suffered economic harm as a result of Defendants' infringing  
19 activities in an amount to be proven at trial.

20 33. On information and belief, Defendants' infringement of the '052 patent has been  
21 willful and wanton because Defendants are on notice of de GRISOGONO's rights in the '052  
22 patent.

23 34. Defendants' infringing activities have caused and will continue to cause de  
24 GRISOGONO irreparable injury for which there is no adequate remedy at law, unless Defendants'  
25 infringing activities are enjoined by this Court under 35 U.S.C. § 283.



**SECOND CLAIM FOR RELIEF**

**(INFRINGEMENT OF U.S. PATENT D627,673 AGAINST ALL DEFENDANTS)**

35. De GRISOGONO repeats and realleges each and every allegation set forth in paragraphs one through twenty-four as if fully set forth herein.

36. Defendants are presently making, using, offering for sale and/or selling items (including without limitation the Accused Product) that infringe the ornamental design for a watch dial disclosed by the '673 patent, literally or under the doctrine of equivalents.

37. Defendants are also presently inducing or contributing to the infringement of the '673 patent.

38. De GRISOGONO has suffered economic harm as a result of Defendants' infringing activities in an amount to be proven at trial.

39. On information and belief, Defendants' infringement of the '673 patent has been willful and wanton because Defendants are on notice of de GRISOGONO's rights in the '673 patent.

40. Defendants' infringing activities have caused and will continue to cause de GRISOGONO irreparable injury for which there is no adequate remedy at law, unless Defendants' infringing activities are enjoined by this Court under 35 U.S.C. § 283.

**PRAYER FOR RELIEF**


WHEREFORE, de GRISOGONO prays for judgment as follows:

1. For judgment in favor of de GRISOGONO on each of its claims;
2. For issuance of a preliminary and permanent injunction against Defendants for infringement of the Patents-in-Suit;
3. For damages in an amount sufficient to compensate de GRISOGONO for Defendants' infringement of the Patents-in-Suit, including a reasonable royalty and/or lost profits under 35 U.S.C. § 284;
4. For pre-judgment and post-judgment interest under 35 U.S.C. § 284;
5. For enhanced damages for Defendants' willful infringement of the Patents-In-Suit, under 35 U.S.C. § 284;

6. For a declaration that this is an exceptional case under 35 U.S.C. § 285 and an award of de GRISOGONO's attorneys' fees and costs incurred in prosecuting its claims;
7. For an award of profits pursuant to 35 U.S.C. § 289; and
8. For such other, further, or different relief as this Court deems just and proper.

Dated: October 31, 2011

ARNOLD & PORTER LLP  
JAMES S. BLACKBURN  
RYAN N. NISHIMOTO  
AMIE L. MEDLEY

By:   
JAMES S. BLACKBURN  
Attorneys for Plaintiff  
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*Of Counsel:*

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1 **DEMAND FOR JURY TRIAL**

2 Pursuant to Fed. R. Civ. P. 38(b), plaintiff de GRISOGONO, S.A. hereby demands trial by  
3 jury of all issues so triable that are raised herein or which hereinafter may be raised in this action.  
4

5 Dated: October 31, 2011

ARNOLD & PORTER LLP  
JAMES S. BLACKBURN  
RYAN N. NISHIMOTO  
AMIE L. MEDLEY

8 By:   
9 JAMES S. BLACKBURN  
Attorneys for Plaintiff  
10 DE GRISOGONO, S.A.  
11

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# **Exhibit A**



US00D596052S

(12) **United States Design Patent** (10) **Patent No.:** **US D596,052 S**  
**Gruosi** (45) **Date of Patent:** **\*\* Jul. 14, 2009**

(54) **WATCH**(75) **Inventor:** **Fawaz Gruosi, Prangins (CH)**(73) **Assignee:** **de Grisogono, S.A., Plans-Les Ouates (CH)**(\*\*) **Term:** **14 Years**(21) **Appl. No.:** **29/281,981**(22) **Filed:** **Jul. 9, 2007**(30) **Foreign Application Priority Data**

Jan. 12, 2007 (CH) ..... 133529

(51) **LOC (9) Cl.** ..... **10-02**(52) **U.S. Cl.** ..... **D10/38**(58) **Field of Classification Search** ..... **D10/125,**  
**D10/30-39; 368/276, 281, 282**

See application file for complete search history.

(56) **References Cited****U.S. PATENT DOCUMENTS**

D351,799 S \* 10/1994 Bulgari ..... D10/39  
D355,371 S \* 2/1995 Strasser ..... D10/30  
D393,598 S \* 4/1998 Perrin et al. .... D10/39  
D403,599 S \* 1/1999 Emmenegger ..... D10/39  
D421,919 S \* 3/2000 Bodino ..... D10/32  
D422,223 S \* 4/2000 Bodino ..... D10/32  
D430,495 S \* 9/2000 Wunderman ..... D10/32  
D434,335 S \* 11/2000 Amstutz ..... D10/32  
D439,525 S \* 3/2001 Versace ..... D10/30  
D440,514 S \* 4/2001 Gruosi ..... D10/125  
D440,886 S \* 4/2001 Burgener ..... D10/32  
D441,668 S \* 5/2001 Dumas ..... D10/39  
D444,406 S \* 7/2001 Hysek ..... D10/126  
D446,461 S \* 8/2001 Wunderman ..... D10/32  
D447,425 S \* 9/2001 Bodino ..... D10/32

D452,171 S \* 12/2001 Bodino ..... D10/32  
D456,283 S \* 4/2002 Baumann ..... D10/32  
D462,280 S \* 9/2002 Cheng ..... D10/39  
D462,281 S \* 9/2002 Wunderman ..... D10/39  
D475,934 S \* 6/2003 Bulgari ..... D10/30  
D487,403 S \* 3/2004 Geockeritz et al. .... D10/39  
D487,404 S \* 3/2004 Dubarry ..... D10/39  
D495,613 S \* 9/2004 Ellia ..... D10/39  
D507,497 S \* 7/2005 Liao ..... D10/30  
D508,211 S \* 8/2005 Dreyfuss ..... D10/32  
D514,455 S \* 2/2006 Peraldi et al. .... D10/38  
D519,853 S \* 5/2006 Sirmakes ..... D10/32  
D526,215 S \* 8/2006 Calvani ..... D10/38  
D526,912 S \* 8/2006 Calvani ..... D10/38  
D569,740 S \* 5/2008 Bodino ..... D10/38  
D574,261 S \* 8/2008 Dreyfuss ..... D10/32

\* cited by examiner

*Primary Examiner*—Lucy Lieberman(74) *Attorney, Agent, or Firm*—Venable, Campillo, Logan & Meaney PC(57) **CLAIM**

The ornamental design for a watch, as shown.

**DESCRIPTION**

FIG. 1 is a front elevation of a watch showing my new design;

FIG. 2 is a top plan view thereof;

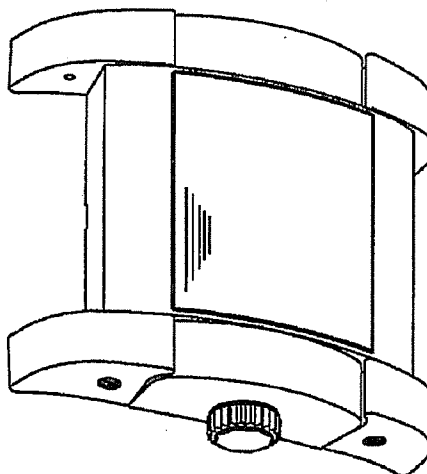
FIG. 3 is a bottom plan view thereof;

FIG. 4 is a left side elevation thereof;

FIG. 5 is a rear elevation thereof;

FIG. 6 is a right side elevation thereof; and,

FIG. 7 is a front, right side and bottom perspective view thereof.

**1 Claim, 1 Drawing Sheet**

U.S. Patent

Jul. 14, 2009

US D596,052 S

Fig. 2



Fig. 1

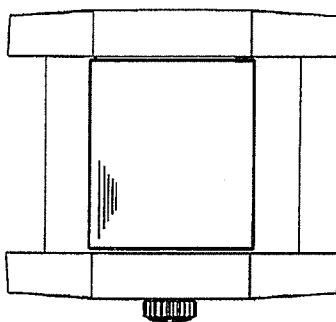


Fig. 3

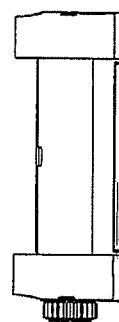


Fig. 7

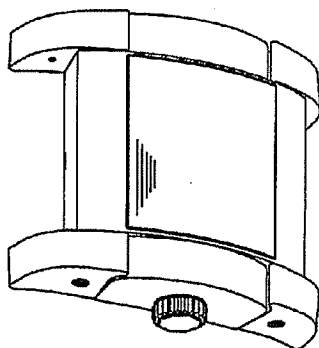


Fig. 4



Fig. 5

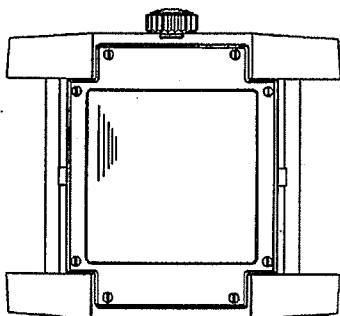
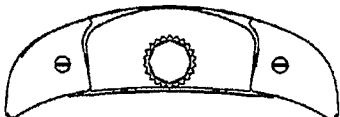


Fig. 6



# **Exhibit B**



US00D627673S

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

(10) **Patent No.:** **US D627,673 S**

(45) **Date of Patent:** **\*\* Nov. 23, 2010**

(54) **WATCH DIAL**

(75) **Inventor:** **Fawaz Gruosi, Prangins (CH)**

(73) **Assignee:** **De Grisogono, S.A., Plan-Les-Ouates (CH)**

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

(21) **Appl. No.:** **29/338,412**

(22) **Filed:** **Jun. 10, 2009**

**Related U.S. Application Data**

(62) **Division of application No. 29/281,981, filed on Jul. 9, 2007, now Pat. No. Des. 596,052.**

(30) **Foreign Application Priority Data**

Jan. 12, 2007 (CH) ..... 133529

(51) **LOC (9) Cl.** ..... **10-07**

(52) **U.S. Cl.** ..... **D10/125**

(58) **Field of Classification Search** ..... **D10/122-126, D10/30-39, 6; 368/223, 228, 232, 285, 281, 368/282, 276**

See application file for complete search history.

(56) **References Cited**

**U.S. PATENT DOCUMENTS**

D96,642 S \* 8/1935 Blumstein ..... D10/125

D240,027 S \* 5/1976 Szalek ..... D10/126  
D444,406 S \* 7/2001 Hysek ..... D10/126  
D459,238 S \* 6/2002 Wunderman ..... D10/32  
D462,281 S \* 9/2002 Wunderman ..... D10/39  
D474,700 S \* 5/2003 Court ..... D10/39  
D487,404 S \* 3/2004 Dubarry ..... D10/39  
D494,490 S \* 8/2004 Chodat ..... D10/126  
D495,613 S \* 9/2004 Elia ..... D10/39  
D516,932 S \* 3/2006 Nataf ..... D10/126  
D519,853 S \* 5/2006 Sirmakes ..... D10/32  
D526,923 S \* 8/2006 Okaya ..... D10/126  
D559,142 S \* 1/2008 Nussbaumer ..... D10/125  
D571,248 S \* 6/2008 Gruosi ..... D10/125  
D578,920 S \* 10/2008 Behling ..... D10/126

\* cited by examiner

*Primary Examiner*—Lucy Lieberman

(74) *Attorney, Agent, or Firm*—Venable, Campillo, Logan & Meaney, P.C.

(57) **CLAIM**

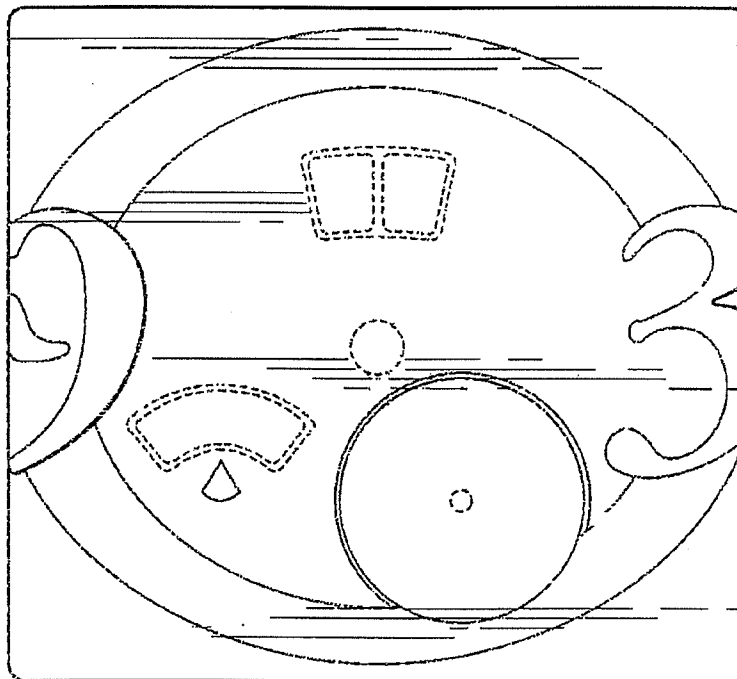
The ornamental design for a watch dial, as shown and described.

**DESCRIPTION**

The sole view is a front elevation of a watch dial showing my new design.

The broken lines in the drawing are used to show portions of the watch dial that do not form part of the claimed design.

**1 Claim, 1 Drawing Sheet**

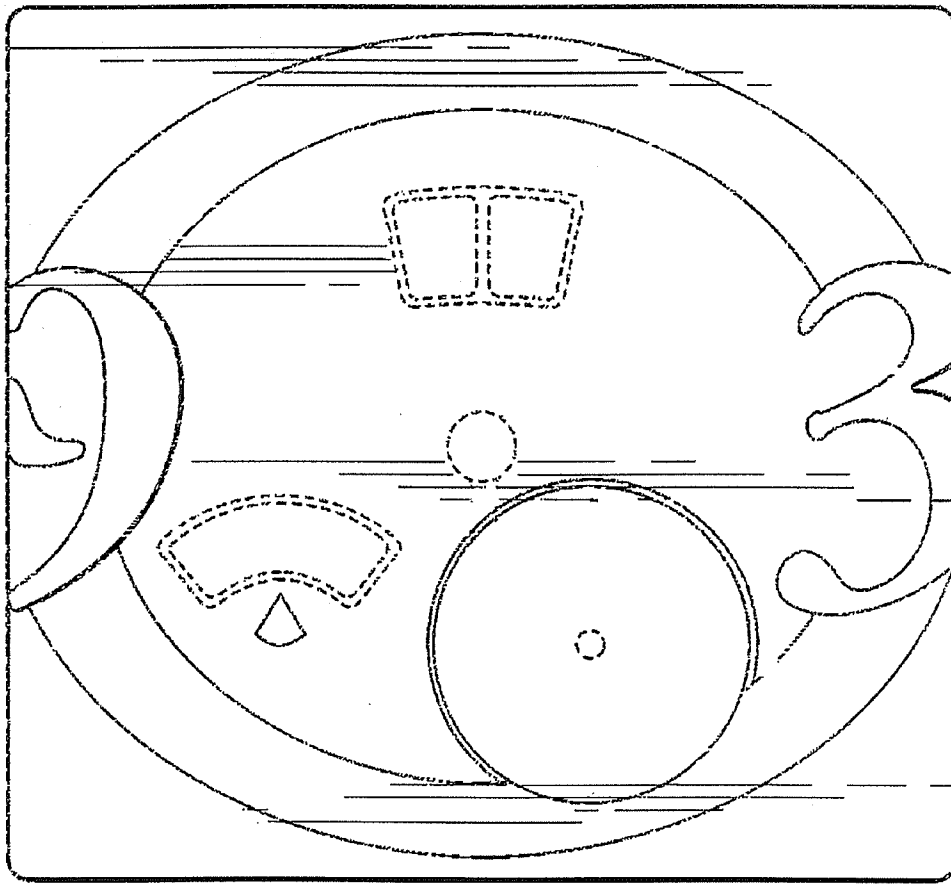




**U.S. Patent**

**Nov. 23, 2010**

**US D627,673 S**



**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Stephen V. Wilson and the assigned discovery Magistrate Judge is Ralph Zarefsky.

The case number on all documents filed with the Court should read as follows:

**CV11- 9022 SVW (RZx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

☒ **Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

☐ **Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

☐ **Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

James S. Blackburn (SBN 16913)  
 Ryan M. Nishimoto (SBN 235208)  
 Amie L. Medley (SBN 266586)  
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 Los Angeles, California 90017  
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**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

DE GRISOGONO, S.A.

PLAINTIFF(S)

v.

PARIS HILTON ENTERTAINMENT, INC.; PARLUX  
 LTD.; CROSSBOW INTERNATIONAL CORP; and  
 PASCAL SAVOY

DEFENDANT(S).

*See attached*

CASE NUMBER

**CV11-9022** *SVWCRZ*

**SUMMONS**

TO:DEFENDANT(S): PARIS HILTON ENTERTAINMENT, INC.; PARLUX, LTD.; CROSSBOW  
 INTERNATIONAL CORP; and PASCAL SAVOY

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ \_\_\_\_\_ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, James S. Blackburn of Arnold & Porter LLP, whose address is 777 S. Figueroa Street, 44th Floor Los Angeles, California 90017. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: OCT 31 2011

By: *Mailey Daw*  
 Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

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Attorneys for Plaintiff  
DE GRISOGONO, S.A.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

DE GRISOGONO, S.A.,

Plaintiff,

vs.

PARIS HILTON ENTERTAINMENT, INC., a  
California corporation; PARLUX LTD., a New  
York corporation; CROSSBOW  
INTERNATIONAL CORP., a Florida  
corporation; PASCAL SAVOY, an individual;  
and DOES 1-10 ,

Defendants.

Case No.:

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

Plaintiff de Grisogono, S.A. ("de GRISOGONO"), for its complaint against defendants Paris Hilton Entertainment, Inc. ("Paris Hilton Entertainment"), Parlux Ltd. ("Parlux"), Crossbow International Corp. ("Crossbow"), and Pascal Savoy ("Mr. Savoy") (collectively "Defendants"), founded upon federal question jurisdiction, alleges as follows:

**NATURE OF THE ACTION**

1. This is an action by de GRISOGONO for patent infringement in violation of 35 U.S.C. §§ 100 *et seq.* arising out of Defendants' infringement of United States Patent Numbers D596,052 (the "'052 patent") and D627,673 (the "'673 patent") (together, the "Patents-in-Suit,"

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET

**I (a) PLAINTIFFS** (Check box if you are representing yourself ☐)  
DE GRISOGONO, S.A.

**DEFENDANTS**  
PARIS HILTON ENTERTAINMENT, INC.; PARLUX LTD.;  
CROSSBOW INTERNATIONAL CORP.; and PASCAL SAVOY

**(b) Attorneys** (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

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Los Angeles, California 90017  
Telephone: +1 213-243-4158

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an X in one box only.)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** - For Diversity Cases Only  
(Place an X in one box for plaintiff and one for defendant.)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. ORIGIN** (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

**V. REQUESTED IN COMPLAINT: JURY DEMAND:** ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

**CLASS ACTION** under F.R.C.P. 23: ☐ Yes ☒ No

☒ **MONEY DEMANDED IN COMPLAINT:** \$ TBD

**VI. CAUSE OF ACTION** (Cite the U. S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Patent infringement, 35 U.S.C. §§ 100 et seq.

**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER	LABOR
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<b>PERSONAL PROPERTY</b>	<b>PETITIONS</b>	<input type="checkbox"/> 710 Fair Labor Standards Act
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus	<input type="checkbox"/> 720 Labor/Mgmt. Relations
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 530 General	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act
<input type="checkbox"/> 450 Commerce/ICC Rates/etc.	<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 740 Railway Labor Act
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 790 Other Labor Litigation
<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<b>BANKRUPTCY</b>	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 22 Appeal 28 USC 158	<input type="checkbox"/> 555 Prison Condition	
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<b>FORFEITURE / PENALTY</b>	<b>PROPERTY RIGHTS</b>
<input type="checkbox"/> 810 Selective Service	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<b>CIVIL RIGHTS</b>	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 620 Other Food & Drug	<input checked="" type="checkbox"/> 830 Patent
<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 630 Liquor Laws	<b>SOCIAL SECURITY</b>
<input type="checkbox"/> 891 Agricultural Act	<b>REAL PROPERTY</b>	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities - Employment	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 61 HIA(1395ff)
<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 210 Land Condemnation	<b>IMMIGRATION</b>	<input type="checkbox"/> 446 American with Disabilities - Other	<input type="checkbox"/> 650 Airline Regs	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 660 Occupational Safety /Health	<input type="checkbox"/> 863 DIWC/DIWW 405(g))
<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 463 Habeas Corpus-Alien Detainee		<input type="checkbox"/> 690 Other	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 465 Other Immigration Actions			<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 245 Tort Product Liability				<b>FEDERAL TAX SUITS</b>
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 290 All Other Real Property				<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
					<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

**FOR OFFICE USE ONLY:** Case Number: CV11-9022

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEETVIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): \_\_\_\_\_

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): \_\_\_\_\_

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or  
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or  
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.  
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Switzerland

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.  
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	Florida

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.  
**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): James S. Blackburn Date October 31, 2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3 -1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old-age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))