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7 UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 NATIONAL PRODUCTS, INC.,

10 Plaintiff,

11 v.

12 LIFEDGE LTD., SCANSTRUT LTD.,

13 Defendants.

Case No. 2:12-cv-1865

COMPLAINT

JURY TRIAL DEMANDED

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15 For its Complaint, Plaintiff National Products, Inc. (“NPI”) states and alleges as
16 follows:

17 **The Parties**

18 1. NPI is a corporation organized and existing under the laws of the State of
19 Washington, having its principal place of business at 8410 Dallas Ave S., Seattle, Washington
20 98108.

21 2. NPI is a market leader in the design, manufacture, and sale of innovative
22 protective cases and vehicle mounting systems for electronic devices.

23 3. Upon information and belief, Defendant Lifedge Limited (“Lifedge”) is a
24 private limited company organized and existing under the laws of the United Kingdom,
25 having its principal place of business at 1 Malt Mill, Malt Mill Lane, Totnes, Devon, United
26 Kingdom TQ9 5NH.

1 offering to sell, and selling within the United States and/or importing into the United States
2 products that infringe the '895 patent, including without limitation all waterproof iPad cases
3 advertised and sold under the name Lifedge on the website: <http://www.lifedge.co.uk/product>,
4 including in this judicial district.

5 12. As a direct and proximate consequence of Defendants' infringement of the
6 '895 patent, NPI has suffered irreparable harm, and NPI will continue to suffer irreparable
7 harm in the future unless Defendants are enjoined from infringing the '895 patent.

8 13. Upon information and belief, the continued infringement by Defendants of the
9 '895 patent is willful.

10 **Prayer for Relief**

11 WHEREFORE, NPI prays for the following relief:

- 12 a. A judgment that Defendants have infringed the '895 patent;
- 13 b. An order preliminarily and permanently enjoining and restraining Defendants,
14 their officers, directors, agents, servants, employees, licensees, attorneys, and all other
15 persons acting under or through Defendants, directly or indirectly, from infringing the '895
16 patent;
- 17 c. A judgment and order requiring that Defendants pay damages under 35 U.S.C.
18 § 284, including treble damages as provided by 35 U.S.C. § 284, with prejudgment interest;
- 19 d. A judgment and order directing Defendants to pay the costs of this action
20 (including all disbursements) and attorney fees as provided by 35 U.S.C. § 285, with
21 prejudgment interest;
- 22 e. Such other and further relief as the Court may deem just and equitable.
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1 **Demand for Jury Trial**

2 NPI hereby demands a trial by jury of all issues so triable.

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4 NATIONAL PRODUCTS, INC.

5 By its attorneys,

6 Dated: October 22, 2012

FENWICK & WEST LLP

7
8 By: s/David K. Tellekson
David K. Tellekson (WSBA No. 33523)

9 By: s/Ewa M. Davison
Ewa M. Davison (WSBA No. 39524)

10 By: s/Jeffrey A. Ware
Jeffrey A. Ware (WSBA No. 43779)

11 1191 Second Avenue, 10th Floor
12 Seattle, WA 98101

13 Telephone: 206.389.4510

Facsimile: 206.389.4511

14 Email: dtellekson@fenwick.com

edavison@fenwick.com

jware@fenwick.com

15 *Attorneys for Plaintiff*
16 *National Products, Inc.*