issued U.S. Patents 7,753,542 ("the '542 Patent") and D457,299 ("The '299

Patent") (collectively the "Lightstream Patents") attached as Exhibit A.

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3. On information and belief, Defendant Atomic Products, LLC. (d/b/a VISIGLO), is a Connecticut limited liability company having a principal place of business at 480 Barnum Avenue, Suite 6, Bridgeport, CT 06608 and an Internet web presence at www.visiglo.com.

## **JURISDICTION AND VENUE**

- 4. This is an action for patent infringement arising under the patent laws of the United States of America, Title 35 U.S.C. Accordingly, this Court has jurisdiction over the subject matter of the Complaint under 28 U.S.C. §§ 1331 and 1338(a).
- 5. Personal Jurisdiction over the defendants is proper in this Court. Venue in this judicial district is proper under 28 U.S.C. §§ 1391(b), (c) and/or 1400(b) in that a substantial part of the events giving rise to the patent infringement claims herein have taken place and may still be taking place in this judicial district.

## **DEFENDANTS' ACTS OF PATENT INFRINGEMENT**

- 6. Lightstream restates and incorporates by reference paragraphs 1 through 5 above as if fully re-stated herein.
- 7. Defendant VISIGLO has been and is infringing the Lightstream Patents by making, using, offering for sale, selling and/or importing dog collars that include mountable electroluminescent welts constructed in accordance with the Lightstream Patents.
- 8. As shown in attached Exhibit B, Defendant makes, uses, imports, sells, and/or offers to sell dog collars constructed with an electroluminescent welt embedded within the dog collar.

- 9. Attached as Exhibit C is an illustrative claim chart generally illustrating how Defendant's accused products infringe the Lightstream Patents.
- 10. Defendant's infringement, contributory infringement and/or inducement to infringe have been willful and have deliberately injured and will continue to injure Lightstream unless and until the Court enters an injunction prohibiting further infringement and, specifically, enjoining further manufacture, use, importation, sale and/or offer for sale of products that fall within the scope of the Lightstream Patents.

## PRAYER FOR RELIEF

WHEREFORE, Lightstream asks this Court to enter judgment against Defendants and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

- A. An award of damages adequate to compensate Lightstream for the infringement that has occurred, together with prejudgment interest from the date infringement of the Lightstream Patents began;
  - B. Increased damages as permitted under 35 U.S.C. § 284;
- C. A finding that this case is exceptional and an award to Lightstream of their attorneys' fees and costs as may be appropriate and as provided by 35 U.S.C. § 285;
- D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the Lightstream Patents;
- E. Prejudgment interest calculated from the time of the first occurrence of any infringing activity through and until entry of judgment; and
- F. Such other and further relief as this Court or a jury may deem proper and just.

1	JURY DEMAND
2	Lightstream demands a trial by jury on all issues presented in this
3	Complaint.
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5	Dated: January 23, 2013. Respectfully submitted,
6	/Philip P. Mann
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