

1 RICHARD G. CAMPBELL, JR.
Nevada Bar No.: 1832
2 ARMSTRONG TEASDALE, LLP
50 West Liberty Street, Suite 950
3 Reno, Nevada 89501
Telephone No.: (775) 322-7400
4 Facsimile No.: (775) 322-9049
5 Email: rcampbell@armstrongteasdale.com

6 JENNIFER E. HOEKEL
Nevada Bar No.: 12775
7 ARMSTRONG TEASDALE LLP
7700 Forsyth Blvd., Suite 1800
8 St. Louis, Missouri 63105
Telephone No.: 314.621.5070
9 Facsimile No.: 314.621.5065
Email: jhoekel@armstrongteasdale.com

10 *Attorneys for Plaintiff Computerized Screening, Inc.*

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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 COMPUTERIZED SCREENING, INC.,

16 Plaintiff,

17 v.

18 STAYHEALTHY, INC.

19 Defendant.

CASE NO.

**PLAINTIFF COMPUTERIZED
SCREENING, INC.’S COMPLAINT**

JURY TRIAL DEMANDED

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23 Plaintiff Computerized Screening, Inc. (“CSI”) states as follows for its Complaint against
24 Stayhealthy, Inc. (“Stayhealthy”):

25 1. This is an action arising under the patent laws of the United States, 35 U.S.C. §§ 1
26 *et seq.*, for infringement of U.S. Patent No. 6,692,436 (the “436 Patent”), attached herein as
27 Exhibit 1.
28

1 9. CSI's kiosks are installed in grocery and drug stores, as well as corporations,
2 emergency rooms, hospitals, clinics, and physician's offices around the United States.

3 10. On February 17, 2004, the United States Patent and Trademark Office
4 ("USPTO") duly and legally issued the '436 Patent to CSI for an invention entitled "Health Care
5 Information System."

6 11. On December 17, 2009, a request for reexamination was filed in the USPTO.
7 The request was granted, the patent claims reexamined, and on September 20, 2011, the USPTO
8 issued the reexamination certificate.

9 12. Upon reexamination, the patentability of claims 1-3, 6-10, 14, 15, 17, 37-49 and
10 52 was confirmed. Claims 4-5, 11-13, 16, 18, 20-24, 33, 35-36, 50-51, 53, and 55-57 were found
11 patentable as amended. Claims 19, 25-32 and 54, dependent on an amended claim, were found
12 patentable. New claims 58-65 were added.

13 13. CSI is the owner by assignment of the '436 Patent.

14 14. The '436 Patent is generally directed to health monitoring kiosks that measure
15 blood pressure or weight and transmit the data through a network to store the measurement data
16 in remote data storage.

17 15. Stayhealthy kiosks employ the inventions claimed in the '436 Patent.

18 16. Stayhealthy has manufactured, used, offered for sale, and/or sold within the
19 United States the Healthcenter Kiosk.

20 17. CSI has informed Stayhealthy of the '436 Patent.

21 **COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,692,436**

22 18. CSI realleges and incorporates by reference Paragraphs 1-17 of this Complaint as
23 if fully set forth herein.

24 19. The '436 Patent is valid, enforceable, and unexpired.

25 20. Stayhealthy has infringed and continues to infringe the '436 Patent, literally and
26 under the doctrine of equivalents, by making, having made, using, selling, offering for sale,
27 and/or importing, without authority, products, including but not limited to the Healthcenter
28 Kiosk.

