

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

TOTAL LOCK & SECURITY, INC.,	)	
d/b/a THE DOOR SWITCH,	)	CIVIL ACTION
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.
	)	
SECURITECH GROUP, INC. and,	)	JURY TRIAL DEMANDED
STANLEY SECURITY SOLUTIONS, INC.,	)	
	)	
Defendants.	)	
_____	)	

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, Total Lock & Security, Inc., d/b/a The Door Switch (“Total Lock”), by its attorneys, for its Complaint for Patent Infringement against defendants SecuriTech Group, Inc. (“SecuriTech”) and Stanley Security Solutions, Inc. (“Stanley Security”), alleges as follows:

**THE PARTIES**

1. Plaintiff Total Lock is a corporation organized and existing under the laws of the State of Missouri, having a principal place of business at 11772 Westline Industrial Drive, St. Louis, Missouri 63146. Total Lock does business within this judicial district.

2. Upon information and belief, defendant SecuriTech is a corporation organized and existing under the laws of the State of Delaware, having a place of business at 54-45 44<sup>th</sup> Street, Maspeth, New York 11378.

3. Upon information and belief, SecuriTech does business throughout the United States and does business within this judicial district, including making and selling door suicide alarms that infringe U.S. Patent Nos. RE42,991 and RE44,039, including but not limited to those products sold under the SEDA brand name.

4. Upon information and belief, defendant Stanley Security is a corporation organized and existing under the laws of the State of Indiana, having a place of business at 6161 East 75<sup>th</sup> Street, Indianapolis, Indiana 46250.

5. Upon information and belief, Stanley Security does business throughout the United States and does business within this judicial district, including selling, offering for sale and distributing the SEDA brand name door suicide alarms made and sold by SecuriTech.

#### **JURISDICTION AND VENUE**

6. This is a civil action for patent infringement arising under the Patent Laws of the United States, including 35 U.S.C. § 271.

7. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a).

8. On information and belief, SecuriTech is subject to personal jurisdiction in this judicial district.

9. On information and belief, Stanley Security is subject to personal jurisdiction in this judicial district.

10. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400(b) and Missouri's Long-Arm Statue. Mo. Rev. Stat. § 506.500.

**FACTUAL BACKGROUND**

11. Total Lock is a leading manufacturer of door suicide alarms.

12. Total Lock expends significant time and money each year in the research and development of door suicide alarms.

13. The United States Patent and Trademark Office issued Total Lock, as assignee, two patents entitled “Door Suicide Alarm” and bearing Patent Nos. RE42,991 (“the ‘991 patent”) (hereby attached as Exhibit A) and Patent No. RE44,039 (“the ‘039 patent”). (hereby attached as Exhibit B).

14. On information and belief, Defendant SecuriTech has made, used, offered to sell and/or sold, and continues to make, use, offer to sell and/or sell, door suicide alarms known by the brand name of SEDA.

15. On information and belief, Defendant Stanley Security also distributes, uses, offers to sell and sells the SEDA door suicide alarm product made by SecuriTech.

16. The SEDA door suicide alarm product infringes multiple claims of the ‘991 patent and the ‘039 patent.

**COUNT I: PATENT INFRINGEMENT**  
**(against all defendants)**

17. Total Lock incorporates by reference paragraphs 1 through 16 as though fully set forth herein.

18. Total Lock is the owner by assignment of all right, title, and interest in the ‘991 patent and the ‘039 patent.

19. The ‘991 patent was duly and legally issued on December 6, 2011, and is valid and enforceable.

20. The '039 patent was duly and legally issued on March 5, 2013 and is valid and enforceable.

21. Total Lock is the sole owner of the entire right, title, and interest in the '991 and '039 patent, including the right to recover for any and all infringement thereof.

22. The claims of the '991 and '039 patents are directed to a novel door suicide alarm.

23. Upon information and belief, SecuriTech manufactures and sells, and Stanley Security distributes and sells, door suicide alarms, including but not limited to the product known as the SEDA door alarm product.

24. Upon information and belief, defendants have infringed, contributorily infringed, and/or induced others to infringe at least one claim of the '991 and '039 patents by making, using, offering to sell and/or selling to customers within this judicial district and elsewhere in the United States, or importing into the United States within the term of the '991 and '039 patents, products including door suicide alarms that embody the invention of the '991 and '039 patents. These acts are without right, license or permission from Total Lock.

25. Defendants actions as described herein constitute infringement of at least one claim of Total Lock's '991 and '039 patents in violation of 35 U.S.C. § 271, 281-285.

26. Upon information and belief, these infringing activities have been willful wanton, and deliberate and are causing substantial and irreparable damage to Total Lock. Defendants' actions will continue unless enjoined by this Court.

27. Total Lock has been damaged by defendants' infringement, contributory infringement and/or inducement of infringement of the '991 and '039 patents and has been and will continue to be irreparably harmed if these infringing activities are not enjoined. Total Lock does not have an adequate remedy at law.

28. This is an "exceptional case" within the meaning of 35 U.S.C. § 285, and Total Lock is entitled to an award of reasonable attorneys' fees.

**PRAYER FOR RELIEF**

WHEREFORE, Total Lock prays for judgment that:

A. Declares that defendants have infringed, contributorily infringed and/or induced infringement of at least one claim of U.S. Patent Nos. RE42,991 and RE44,039, and these infringing activities have been willful;

B. Defendants and each of their respective subsidiaries, officers, agents, servants and employees, directors, licensees, successors, assigns, and those persons in active concert or participation with any of them, be preliminarily and permanently enjoined from further infringement, contributory infringement and inducement of infringement of U.S. Patent Nos. RE42,991 and RE44,039;

C. Awards Total Lock damages adequate to compensate for Total Lock's losses caused by the wrongful and infringing activities of defendants, together with interest;

D. The damages caused by defendants' infringement be trebled and Total Lock be awarded damages with interest, cost and reasonable attorneys' fees under 35 U.S.C. §§ 284, 285, and other applicable law, by reason of the willful, wanton and

deliberate nature of defendants' infringement of U.S. Patent Nos. RE42,991 and RE44,039;

E. Total Lock be awarded such further relief as this Court may deem just and proper.

Dated: September 2, 2015

HARNES, DICKEY & PIERCE, P.L.C.

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