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19 PRESSURE SPECIALIST, INC.

20 UNITED STATES DISTRICT COURT  
21 CENTRAL DISTRICT OF CALIFORNIA

22 PRESSURE SPECIALIST, INC., an  
23 Illinois corporation,

24 Plaintiff,

25 vs.

26 HK ARMY INC., a California  
27 corporation,

28 Defendant.

Case No.:

**COMPLAINT FOR DAMAGES  
FOR PATENT INFRINGEMENT**

**[Demand for Jury Trial]**

Plaintiff, PRESSURE SPECIALIST, INC., (“PSI” or “Plaintiff”), an Illinois corporation, by and through its attorneys, for its Complaint against Defendant, HK Army, Inc. (“HK Army” or “Defendant”), states as follows:

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**PARTIES, JURISDICTION AND VENUE**

**THE PARTIES**

1. This Complaint asserts a claim for patent infringement that arises under the patent laws of the United States, Title 35 of the United States Code and is brought to stop Defendants’ infringement of Plaintiff’s United States Patent No. 7,059,343, entitled “*Direct Acting Gas Regulator*” (hereinafter, the “‘343 Patent”). A copy of the ‘343 Patent is attached hereto as **Exhibit A**.

2. Plaintiff Pressure Specialist, Inc. (“PSI”) is an Illinois corporation with its principal place of business at 186 Virginia Rd., Crystal Lake, IL 60014.

3. PSI makes and sells products used with paintball markers, including the air-pressure regulator subject of the ‘343 patent.

4. Defendant HK Army, Inc. (“HK Army” or “Defendant”) is an California corporation located at 1448 W 178th St, Gardena, California, 90248.

**JURISDICTION AND VENUE**

5. This Court has original subject matter jurisdiction under 28 U.S.C. §1331 and 1338(a).

6. HK Army manufactures and sells paintball gun parts, including air-pressure regulators subject to this lawsuit, throughout the United States, in Illinois, and in this judicial district.

7. Venue is proper in this District under 28 U.S.C. § 1400(b) because HK Army resides in this district, and also because HK Army has a regular and established place of business and has committed acts of infringement in this District.

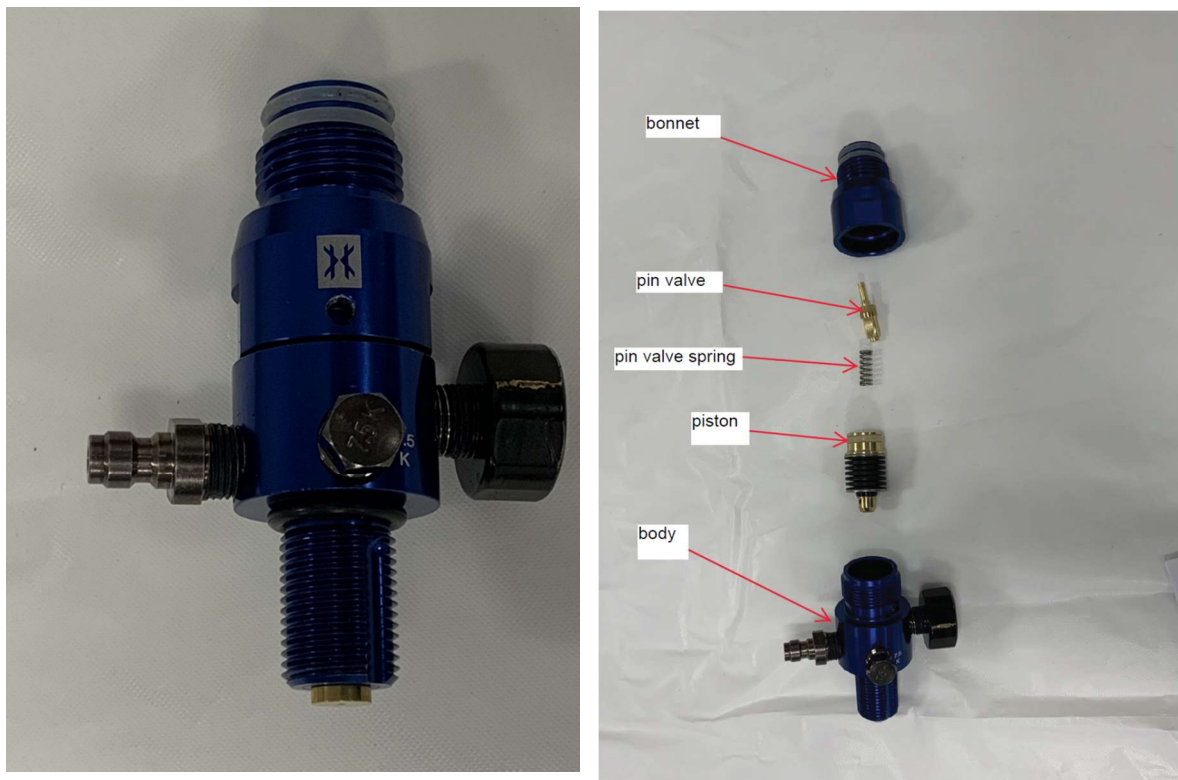
**BACKGROUND**

8. Plaintiff, PSI, is principally engaged in the business of designing, developing, manufacturing, distributing and selling hoses, fittings, regulators, fill stations and accessories for paintball, air-gun and related industries. PSI has designed and manufactured paintball products and holds 12 patents covering various paintball products. PSI is a leader in the industry.

1 9. A paintball regulator is a device that regulates the pressure of the air  
2 entering a paintball marker by cutting off the air source when the pressure in the  
3 regulator chamber reaches a certain pressure. PSI has over 20 years of experience  
4 building regulators for numerous paintball manufacturers. PSI's regulators are ASTM  
5 compliant. ASTM is an international standards organization that develops and  
6 publishes voluntary consensus technical standards for a wide range of materials,  
7 products, systems, and services.

8 10. This action arises from Defendant's infringing importation, sale, offer  
9 for sale, and inducement of use of paintball regulators referred to herein as the HK  
10 Army Basic Compressed Air Tank Regulator (the HK Army regulator) The HK Army  
11 regulators are imported and sold by HK Army. HK Army markets and sells its  
12 infringing products through various dealers and dealer websites, including but not  
13 limited to <https://paintball-online.com/> and <https://www.ansgear.com/>.

14 11. As an example, pictures of the HK Army Regulator, both assembled and  
15 exploded, are set forth below:



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**COUNT I**

**(INFRINGEMENT OF U.S. PATENT NO. 7,059,343)**

12. PSI incorporates paragraphs 1 through 11 above as paragraph 12 herein.

13. This cause of action arises under the patent laws of the United States, and in particular, 35 U.S.C. § 271.

14. PSI is the owner of all right, title and interest in the ‘343 patent, entitled “*Direct Acting Gas Regulator*,” including the right to exclude others and to enforce, sue and recover damages for past and future infringement.

15. The ‘343 patent is valid, enforceable and was duly issued in full compliance with Title 35 of the United States Code.

16. Defendant has directly infringed and continues to directly infringe one or more claims of the ‘343 patent in this judicial district and in the United States, including at least claim 1, without the consent or authorization of PSI, by or through its making, having made, offering for sale, selling, and/or using the HK Army regulator.

17. Claim 1 of the ‘343 patent recites:

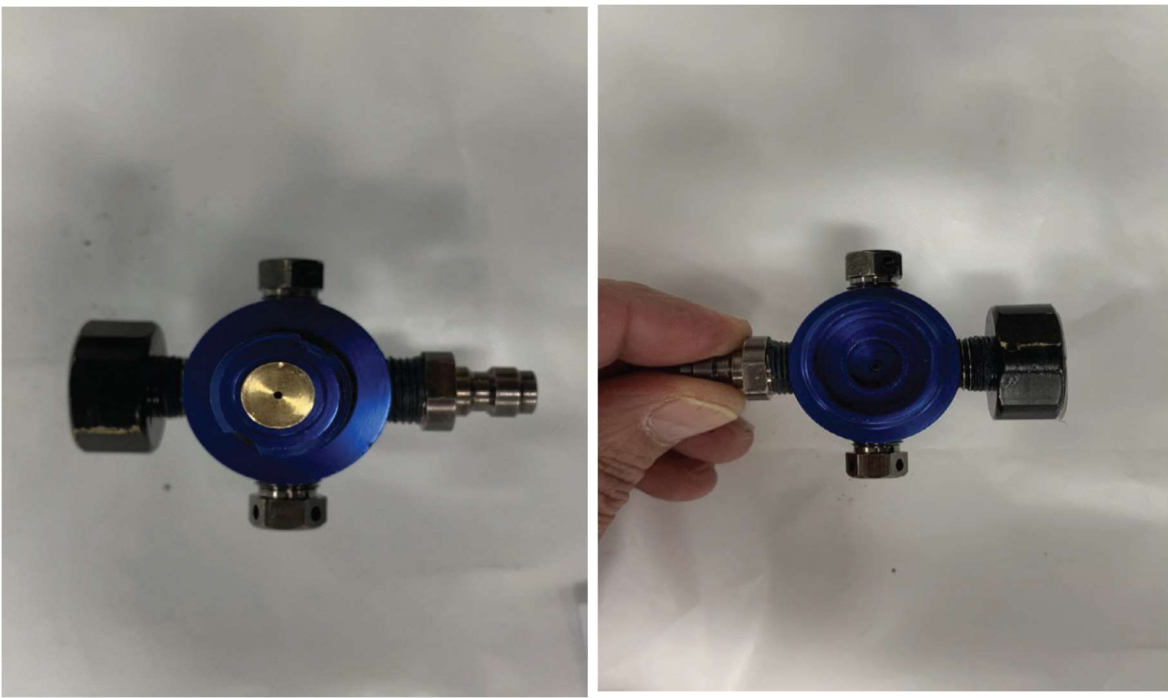
A direct acting pressure regulator for controlling the flow of a gas from a high pressure source to a low pressure device, the gas being delivered from the regulator at a predetermined outlet pressure, comprising:

- a body having a high pressure inlet and defining a seat;
- a bonnet engageable with the body to define a piston chamber within the body and the bonnet, the bonnet having a regulated gas outlet;
- a piston disposed within the piston chamber and defining a gap between the piston and a wall defining the chamber, the piston movable between an open regulator condition and a closed regulator condition, the piston including a plug having a sealing

1 element with a sealing surface engageable with the seat and  
2 movable toward the seat to the closed regulator condition to  
3 close a flow path through the regulator and away from the seat  
4 to the open regulator condition to open the flow path through  
5 the regulator, the plug having radially disposed openings  
6 therein for communicating gas from around the plug to a central  
7 longitudinal bore in the piston, the piston having an  
8 impingement surface in flow communication with the central  
9 bore such that gas pressure on the impingement surface exerts  
10 a force on the piston to move the piston to the closed regulator  
11 condition;  
12 a spring for urging the piston to the open regulator condition; and  
13 a pin valve disposed within the central longitudinal bore in the  
14 piston.

15 (Exh. A, col. 5, line 46-col. 6, line 8).

16 18. The HK Army regulator has a body with a high pressure inlet (shown  
17 below left) and a seat in the body (shown below right):



1            19. The HK Army regulator has a bonnet that is threaded onto the body to  
2 define a piston chamber.

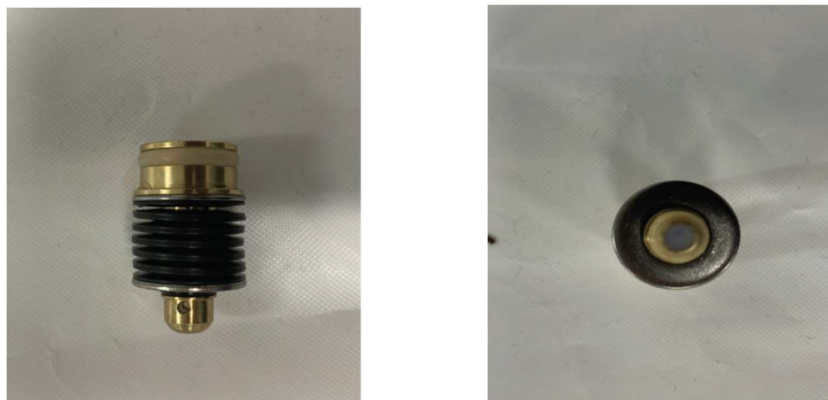
3            20. The bonnet of the HK Army regulator has a low pressure side outlet, as  
4 shown in the opening in the bonnet, in the picture at right, below:



14           21. The HK Army regulator includes a gap formed between the piston and  
15 the piston chamber wall.

16           22. The piston of the HK Army regulator moves between an open position  
17 in which the piston moves away from the seat and a closed position in which the  
18 piston moves towards the seat.

19           23. The end of the piston inserted in the HK Army regulator body includes  
20 a plug (shown at the bottom of the picture below, at left) with a sealing element  
21 (shown below, at right):



1           24. The HK Army regulator sealing element engages with the seat in the  
2 closed position.

3           25. The HK Army regulator piston plug has openings that are transverse to  
4 the plug and that open into a bore in the piston.

5           26. The HK Army regulator piston includes an impingement surface  
6 opposite the plug in flow communication with the central bore.

7           27. As shown in the picture above, the HK Army regulator has a Belleville  
8 spring which is positioned on the piston. The Belleville spring is positioned within  
9 the piston chamber. The spring urges the plug away from the seat.

10          28. The HK Army regulator includes a pin valve and pin valve spring (shown  
11 below):



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20          29. The HK Army regulator has pin valve positioned in the piston bore.

21          30. PSI has been damaged as a result of Defendant's infringing conduct  
22 described in this Count. Defendant is liable to PSI in an amount that adequately  
23 compensates it for Defendant's infringement, which, by law, cannot be less than a  
24 reasonable royalty, together with interest and costs as fixed by this Court, under 35  
25 U.S.C. § 284.

26          31. Defendant has committed direct infringement as alleged in Count I at  
27 least through importing, advertising and offering to sell, and/or selling the infringing  
28 Regulator.



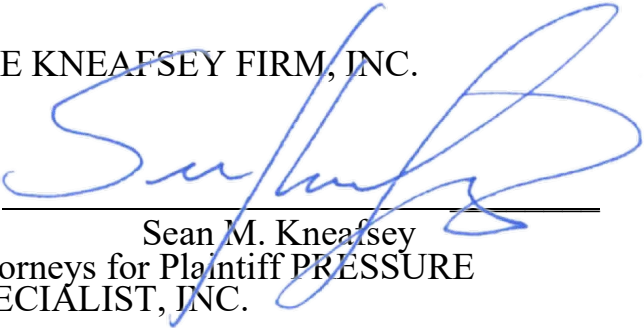


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- '343 patent and (2) making, importing, using, selling, and offering for sale the Regulator;
- C. An award of damages, sufficient to compensate Plaintiff for HK Army’s infringement under 35 U.S.C. § 284, including an award of enhanced damages up to three times the amount found or assessed;
- D. That the case be found exceptional under 35 U.S.C. § 285 and that Plaintiff be awarded its attorneys’ fees;
- E. Costs and expenses in this action;
- F. An award of prejudgment and post-judgment interest; and
- G. Such other and further relief as the Court may deem just and proper.

DATED: May 31, 2022

THE KNEAFSEY FIRM, INC.

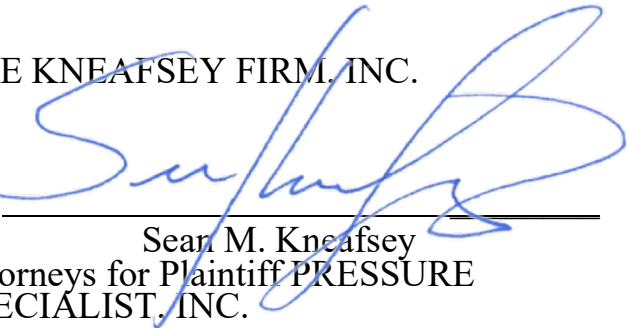
By   
 Sean M. Kneafsey  
 Attorneys for Plaintiff PRESSURE  
 SPECIALIST, INC.

**JURY TRIAL DEMAND**

Plaintiff hereby demands a trial by jury of any issue triable by right of a jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

DATED: May 31, 2022

THE KNEAFSEY FIRM, INC.

By   
 Sean M. Kneafsey  
 Attorneys for Plaintiff PRESSURE  
 SPECIALIST, INC.