

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 0:21-cv-61712

AMERICAN REGISTRY, LLC,  
a Florida Limited Liability Company,

Plaintiff,

v.

PROFESSIONAL LAMINATING, LLC d/b/a  
PROFESSIONAL LAMINATING & RECOGNITION,  
a North Carolina Limited Liability Company,

Defendant.

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**COMPLAINT**

Plaintiff, AMERICAN REGISTRY, LLC, (“**AMERICAN REGISTRY**” or “**Plaintiff**”),  
by and through the undersigned counsel, sues the Defendant, PROFESSIONAL LAMINATING,  
LLC d/b/a PROFESSIONAL LAMINATING & RECOGNITION (“**PLR**” or “**Defendant**”) for  
Patent Infringement, and alleges as follows:

**NATURE OF CLAIMS/SUBJECT MATTER JURISDICTION**

1. This is an action for patent infringement under the patent laws of the United States, 35 U.S.C. §101, et seq.
2. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338.

**THE PARTIES**

3. Plaintiff is a limited liability company organized and existing under the laws of the State of Florida, having a principal address at 1020 N.W. 6th Street, Deerfield Beach, Florida 33445.

4. Upon information and belief, Defendant is a limited liability company organized and existing under the laws of the State of North Carolina, having a principal address at 233 East Johnson Street, Suite M, Cary, North Carolina 27513.

**PERSONAL JURISDICTION AND VENUE**

5. Personal jurisdiction over PLR is properly established in this District because, upon information and belief, PLR has sufficient contacts in the State of Florida, including, but not limited to, in the Southern District of Florida, and has purposefully avails itself of the benefits and protections of the State of Florida by knowingly selling and/or offering to sell infringing products and services or otherwise conducting business in this State, and more specifically, in this District.

6. Personal jurisdiction is also established in this District pursuant to Florida's Long Arm Statute (Florida Statute §48.193 et. seq.), as, upon information and belief, the tortious acts complained of herein were committed in the State of Florida, including in this District; the property infringed upon is situated in the State of Florida, as discussed in detail hereinafter; the infringing acts were directed at AMERICAN REGISTRY, an entity operating in Florida; and Defendant has engaged in substantial activity in Florida.

7. Therefore, the Court's exercise of jurisdiction over PLR does not offend the traditional notions of fair play and substantial justice.

8. Venue is properly established in this District pursuant to 28 U.S.C. §1391(b) as, upon information and belief, PLR has sufficient contacts in the Southern District of Florida to be deemed to reside in this District and therefore subject to this Court's personal jurisdiction and/or because PLR has engaged in acts of patent infringement within this District, said acts being the subject of this Complaint.

## AMERICAN REGISTRY'S U.S. PATENT

9. On or about June 10, 2008, U.S. Patent No. 7,386,800 (the “**800 Patent**”) was duly and lawfully issued for personalized, customized achievement recognition items, as well as methods and systems for producing the same (the “**Patented Invention**”). A copy of the ‘800 Patent is attached as **Exhibit A**.

10. AMERICAN REGISTRY is the owner by way of assignment of all rights and title in and to the ‘800 Patent.

11. AMERICAN REGISTRY has never authorized PLR to make, use, sell, offer to sell, and/or import into the United States, and/or its territories, any personalized, customized achievement recognition items, or methods or systems for producing the same, as recited in the claims of the ‘800 Patent, or to otherwise practice the Patented Invention.

## PLR's INFRINGING ACTIONS

12. Upon information and belief, PLR, has and continues to make, use, sell, offer to sell, and/or import into the United States, and/or its territories, including within the Southern District of Florida, a personalized, customized achievement recognition item produced via a method and system having an on-line interactive network site including a personalized network page with a pre-populated list of one or more achievements from which a user can customize and personalize specifications for the personalized, customized achievement recognition item (the “**PLR Method and System**”). Attached hereto as **Composite Exhibit B** are copies of printouts from PLR’s website at [www.prorecognition.com](http://www.prorecognition.com) which are illustrative of a personalized, customized achievement recognition item that may be produced via a method and system having an on-line interactive network site including a personalized network page with a pre-populated list of one or more achievements from which a user can customize and personalize specifications for the personalized, customized achievement recognition item.

13. The PLR Method and System includes a method and system having an online interactive network site including a personalized network page with a pre-populated list of one or more achievements from which a user can customize and personalize specifications for a personalized, customized achievement recognition item, which encompasses the Patented Invention and infringes the '800 Patent.

14. Upon information and belief, despite knowledge of the same, PLR has and continues to infringe the '800 Patent in complete deliberate, wanton, and willful disregard of AMERICAN REGISTRY's rights in and to the '800 Patent by making, using, selling, offering to sell, and/or importing into the United States, and/or its territories, a personalized, customized achievement recognition item produced via a method and system having an online interactive network site including a personalized network page with a pre-populated list of one or more achievements from which a user can customize and personalize specifications for the personalized, customized achievement recognition item which encompasses the Patented Invention and infringes the '800 Patent, thereby deriving unlawful gains and profits.

15. PLR's actions are evidenced by the printouts from PLR's website offering for sale a personalized, customized achievement recognition item which may be produced via a method and system having an on-line interactive network site including a personalized network page with a pre-populated list of one or more achievements from which a user can customize and personalize specifications for the personalized, customized achievement recognition item. *See Exhibit B.*

16. Upon information and belief, PLR will continue to infringe the '800 Patent in deliberate, wanton, and willful disregard of AMERICAN REGISTRY's patent rights and to AMERICAN REGISTRY's irreparable damage, unless restrained by this Court.

17. PLR's actions constitute infringement of the '800 Patent, directly and/or indirectly, literally and/or under the doctrine of equivalents, and such actions are deliberate, wanton, and willful.

18. Plaintiff has agreed to pay the undersigned attorney a reasonable attorneys' fee to prosecute this action.

**COUNT I – DIRECT INFRINGEMENT OF U.S. PATENT NO. 7,386,800**

19. AMERICAN REGISTRY incorporates herein each and every allegation set forth in Paragraphs 1 through 18 of this Complaint, as if fully set forth herein.

20. Upon information and belief, PLR's aforesaid acts constitute direct infringement of independent claims 1, 9, 17, and 25 of the '800 Patent, either literally or under the doctrine of equivalents, pursuant to 35 U.S.C. §271(a).

21. Upon information and belief, PLR had notice of its infringement, therefore, PLR's infringement of independent claims 1, 9, 17, and 25 of the '800 Patent has been willful, wanton, and deliberate.

22. The filing and service of this Complaint serve as actual notice and knowledge of infringement of the '800 Patent on the part of PLR, such that all of PLR's post-suit infringement of claims 1, 9, 17, and 25 of the '800 Patent is willful, wanton, and deliberate.

23. PLR's aforesaid acts have caused and will continue to cause great and irreparable injury to AMERICAN REGISTRY, and, upon information and belief, unless said acts are restrained by this Court, they will continue.

24. AMERICAN REGISTRY has no adequate remedy at law.

**COUNT II – INDIRECT INFRINGEMENT OF U.S. PATENT NO. 7,386,800**

25. AMERICAN REGISTRY incorporates herein each and every allegation set forth in Paragraphs 1 through 18 of this Complaint, as if fully set forth herein.

26. Upon information and belief, PLR's aforesaid acts constitute indirect infringement of independent claims 1, 9, 17, and 25 of the '800 Patent, either literally or under the doctrine of equivalents, pursuant to 35 U.S.C. §271(b).

27. Upon information and belief, PLR's aforesaid acts were and continue to be with the specific intent and knowledge of actively inducing end users to produce a personalized, customized achievement recognition item via a method and system having an on-line interactive network site including a personalized network page with a pre-populated list of one or more achievements from which a user can customize and personalize specifications for the personalized, customized achievement recognition item in a manner which results in a direct infringement of claims 1, 9, 17, and 25 of the '800 Patent, either literally or under the doctrine of equivalents

28. Upon information and belief, PLR had notice of its infringement, therefore, PLR's infringement of independent claims 1, 9, 17, and 25 of the '800 Patent has been willful, wanton, and deliberate.

29. The filing and service of this Complaint serve as actual notice and knowledge of infringement of the '800 Patent on the part of PLR, such that all of PLR's post-suit infringement of claims 1, 9, 17, and 25 of the '800 Patent is willful, wanton, and deliberate.

30. PLR's aforesaid acts have caused and will continue to cause great and irreparable injury to AMERICAN REGISTRY, and, upon information and belief, unless said acts are restrained by this Court, they will continue.

31. AMERICAN REGISTRY has no adequate remedy at law.

## **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff, AMERICAN REGISTRY, LLC, prays:

A. That this Court adjudge that PLR has infringed and is infringing AMERICAN REGISTRY's rights in the '800 Patent, directly and indirectly, literally and under the doctrine of equivalents, in violation of 35 U.S.C. §271, and that PLR's infringement has been and continues to be willful;

B. That AMERICAN REGISTRY be awarded damages adequate to compensate it for the damages it has suffered as a result of PLR's infringement of the '800 Patent, and that such damages be trebled, pursuant to 35 U.S.C. §284;

C. That PLR be ordered to pay pre-judgment interest to AMERICAN REGISTRY on all amounts awarded and post-judgment interest until paid at the maximum lawful rate;

D. That, pursuant to 35 U.S.C. §283, or as otherwise authorized, PLR, its officers, agents, servants, employees, attorneys and all persons acting in concert or participation with it who receive actual notice of the Court's order, be permanently enjoined from:

- 1) directly or indirectly manufacturing, using, selling, offering for sale, or importing into the United States of its territories any personalized, customized achievement recognition item produced via a method and system having an on-line interactive network site including a personalized network page with a pre-populated list of one or more achievements from which a user can customize and personalize specifications for the personalized, customized achievement recognition item that infringes the '800 Patent, directly or indirectly, literally or under the doctrine of equivalents; and
- 2) attempting, causing, or assisting any of the above-described acts.

E. That the Court retain jurisdiction of this action for the purpose of enabling AMERICAN REGISTRY to apply to the Court at any time for such further orders and interpretation or execution of any order entered in this action; for the modification of any such

order; for the enforcement or compliance therewith; and for the punishment of any violations thereof;

F. That PLR be ordered to pay AMERICAN REGISTRY's attorneys' fees, as provided by 35 U.S.C. §285, or as otherwise authorized;

G. That PLR be ordered to pay AMERICAN REGISTRY's taxable and nontaxable costs, as provided by 35 U.S.C. §284, Fed.R.Civ.P. 54, or as otherwise authorized; and

H. That AMERICAN REGISTRY be awarded such other and further relief, at law or in equity, as the Court may deem just and proper under the circumstances.

### **JURY DEMAND**

Plaintiff demands a trial by jury as to all issues triable of right by a jury.

Dated this 16th day of August, 2021.

Respectfully submitted,

/s/ Adam J. Steinberg  
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