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9 Attorneys for Plaintiffs
 10 Watson Guide IP LLC and
 ROE Dental Laboratory, Inc.
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12 **UNITED STATES DISTRICT COURT**
 13 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**
 14

15 WATSON GUIDE IP LLC, a Delaware
 16 limited liability company, and ROE
 DENTAL LABORATORY, INC., an
 17 Ohio corporation,

18 Plaintiffs,

19 vs.

20 GLOBAL MANAGEMENT
 SYSTEMS LLC, a Nevada limited
 21 liability company, and DANIEL
 22 NOWAK, an individual,

23 Defendants.

Case No. '22CV1046 BEN MDD

**COMPLAINT FOR
 PATENT INFRINGEMENT**

DEMAND FOR JURY TRIAL

24
 25 Plaintiffs Watson Guide IP, LLC (“Watson IP”) and ROE Dental Laboratory,
 26 Inc. (“ROE”), by and through their counsel, file this Complaint against defendants

1 Global Management Systems LLC (“Global”) and Daniel Nowak (“Nowak”), and
2 allege as follows:

3 **PRELIMINARY STATEMENT**

4 1. This is a patent infringement action alleging that Global and Nowak
5 have infringed and continue to infringe and induce infringement of one or more
6 claims of U.S. Patent No. 11,173,016 (“the ‘016 patent”) by making, using, selling,
7 and offering to sell guided dental surgery products and services.

8 **THE PARTIES**

9 2. Plaintiff Watson IP is a Delaware limited liability company having its
10 principal place of business at 4933 Ocean View Blvd., La Canada, California 91011.

11 3. Plaintiff ROE is an Ohio corporation with a principal place of business
12 at 7165 E. Pleasant Valley Rd., Independence, Ohio 44131.

13 4. On information and belief, Global is a Nevada limited liability company
14 registered to do business in California with a principal place of business at 719 N.
15 Tremont Street, Oceanside, CA 92054. On information and belief, Global does
16 business as Titan Surgical Systems, as TheDigitalFACE.dental Technologies, and as
17 Guided Surgical Systems.

18 5. On information and belief, Defendant Nowak is an individual residing in
19 San Diego County, California. On information and belief, Nowak is the sole officer,
20 and controls and personally directs the activities of Global.

21 **JURISDICTION AND VENUE**

22 6. This is a civil action for patent infringement under the laws of the United
23 States, Title 35 United States Code.

24 7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§
25 1338(a) and 1331.



14. The '016 patent, titled "Fixation Base and Guides for Dental Prosthesis Implantation" was duly and legally issued by the United States Patent and Trademark Office on November 16, 2021. A true and correct copy of the '016 patent is attached as Exhibit A.

15. Watson IP and ROE have complied with 35 U.S.C. § 287(a) by marking substantially all of the Chrome GuidedSMILE products with the number of the '016 patent.

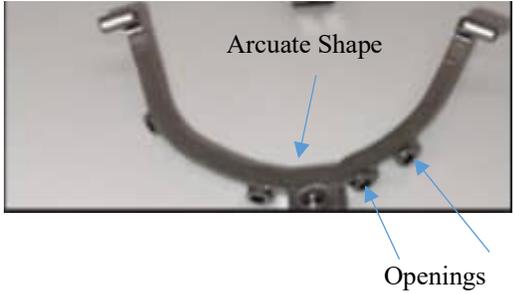
16. On information and belief, Global and Nowak know and have known of the '016 patent, and are and have been aware of the Chrome GuidedSMILE products which are marked with the '016 patent. On information and belief, Nowak has misleadingly claimed an unspecified interest in the '016 patent.

17. Neither Watson IP nor ROE has authorized Global or Nowak to use the '016 patent or any portion thereof.

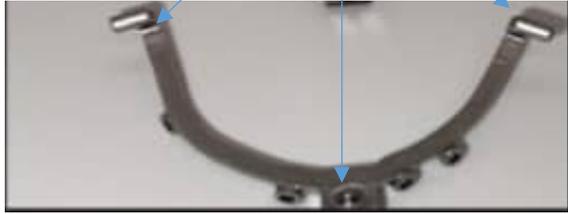
1 18. On information and belief, Global makes, sells and offers to sell guided
2 surgery products. On information and belief, components of the guided surgery
3 products are shown below:



1 19. On information and belief, the guided surgery products infringe at least
 2 claim 6 of the '016 patent as shown below:

'016 patent, claim 6	Nowak Product
<p data-bbox="298 504 805 924">An apparatus for installing a dental prosthesis to maxillary or mandibular jaw bone of a patient, the apparatus comprising: a fixation base for providing an attachment surface for a dental guide used during a dental prosthesis installation procedure, the fixation base further comprising</p>	
<p data-bbox="298 1016 805 1184">a generally arcuate base member with a front surface that includes a plurality of openings through which fasteners can be passed,</p>	
<p data-bbox="298 1444 513 1478">a rear surface,</p>	

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<p>a horizontal surface, and</p>	
<p>manually releasable attachment elements for attachment of a dental guide used during a prosthesis installation to the fixation base,</p>	<p>Manually Releasable Attachment of</p> 
<p>wherein the fixation base is configured and dimensioned to fit only in front of the maxillary or mandibular bone structure of a patient and which fixation base itself does not include any portions which would otherwise extend in back of the maxillary or mandibular bone structure of a patient.</p>	

SECOND CAUSE OF ACTION

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2 30. Paragraphs 1 through 29 are incorporated by reference as if fully set
3 forth herein.

4 31. By causing others to use the invention claimed in the '016 patent,
5 Nowak has induced infringement in violation of 35 U.S.C § 271(b).

6 32. Nowak's acts of inducement of infringement have been and continue to
7 be willful and deliberate.

8 33. By reason of Nowak's inducement, Watson IP and ROE have suffered
9 and continue to suffer damages, including lost profits.

10 34. By reason of Nowak's inducement, Watson IP and ROE have suffered
11 irreparable harm for which there is no adequate remedy at law, which will continue
12 unless Nowak is enjoined.

PRAYER FOR RELIEF

1
2 WHEREFORE, Watson IP and ROE respectfully request the Court enter
3 judgment in their favor and against Global and Nowak as follows:

- 4 a) Declaring that Global has directly infringed and is directly infringing the
5 ‘016 patent;
- 6 b) Declaring that Global and Nowak have induced infringement the ‘016
7 patent;
- 8 c) Declaring that Global’s and Nowak’s infringement and inducement have
9 been willful;
- 10 d) Declaring that this case is exceptional under 35 U.S.C. § 285;
- 11 e) Preliminarily and permanently enjoining Global from making, selling or
12 offering for sale its accused guided surgery products and colorable
13 variations thereof;
- 14 f) Preliminarily and permanently enjoining Global and Nowak from
15 encouraging others to use the accused guided surgery products and
16 colorable variations thereof;
- 17 g) Awarding Watson IP and ROE their respective damages including lost
18 profits, but not less than a reasonable royalty;
- 19 h) Trebling the damages awarded to Watson IP and ROE;
- 20 i) Awarding all costs and expenses of this action, including Watson IP’s and
21 ROE’s reasonable attorneys’ fees;
- 22 j) Awarding pre-judgment and post-judgment interest;
- 23 k) Awarding such other and further relief as the Court may deem just,
24 necessary, and proper.
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Dated: July 18, 2022

KARISH & BJORGUM, PC

By: /s/ Bruce G. Chapman

Bruce G. Chapman
Attorneys for Plaintiffs
Watson Guide IP LLC and
ROE Dental Laboratory, Inc.

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DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38(b), Plaintiffs hereby demands a trial by jury of all issues raised by the Complaint which are properly triable to a jury.

Dated: July 18, 2022

KARISH & BJORGUM, PC

By: /s/ Bruce G. Chapman

Bruce G. Chapman
Attorneys for Plaintiffs
Watson Guide IP LLC and
ROE Dental Laboratory, Inc.