

1 Dennis B. Danella, Esq. (State Bar. No. 027728)
2 **WOODS OVIATT GILMAN LLP**
3 1900 Bausch & Lomb Place
4 Rochester, New York 14604
5 Telephone: +1.585.987.2919
6 Facsimile: +1.585.362.4612
7 Email: ddanella@woodsoviatt.com

8 *Attorneys for Plaintiff*

9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR DISTRICT OF ARIZONA

12 Hanchett Entry Systems, Inc., an)
13 Arizona corporation,)
14)
15 Plaintiff,)

No.: _____

16 vs.)

17 **COMPLAINT**
18 **DEMAND FOR A JURY TRIAL**

19 Camden Marketing Inc. d/b/a Camden)
20 Door Controls, a Canadian)
21 corporation,)
22)
23 Defendant.)
24 _____)

25 Plaintiff, Hanchett Entry Systems, Inc. (“HES” or “plaintiff”), for its complaint
26 against the defendant Camden Marketing Inc. d/b/a Camden Door Controls (“Camden”), a
27 Canadian corporation, alleges as follows:

28 **PRELIMINARY STATEMENT**

29 1. This is an action brought by HES against Camden for infringement of United
30 States Patent Nos. 10,563,427 (“the ‘427 Patent”), 10,794,088 (“the ‘088 Patent”),
31
32

1 and D794,416 (“the ‘416 Patent”), in violation of the United States Patent Laws 35 U.S.C.
2 § 1 *et seq.* HES also brings this action against Camden for infringement of HES’ common
3 law trademark rights.

4 **THE PARTIES**

5 2. HES is, and at all times hereinafter mentioned was, a corporation organized
6 and existing under the laws of the State of Arizona, with its principal place of business
7 located in Phoenix, Arizona.

8 3. Upon information and belief, Camden is, and at all times hereinafter
9 mentioned was, a company organized and existing under the laws of the province of
10 Ontario, Canada, having an address of 2395 Skymark Avenue, Mississauga, Ontario,
11 Canada L4W 4Y6 (Ontario Corporation #1107202/Federal Corporation #2320941) and
12 located at 5502 Timerlea Blvd., Mississauga, Ontario, Canada L4W 2T7.

13 4. Based upon the marketing information contained on Camden’s website
14 (www.camdencontrols.com/rep#Arizona), Camden conducts business within the United
15 States of America including the State of Arizona.

16 **JURISDICTION AND VENUE**

17 5. This Court has exclusive jurisdiction over the subject matter of the complaint
18 pursuant to 28 U.S.C. §§ 1331, 1332 and 1338(a).

19 6. Personal jurisdiction over Camden is consistent with the United States
20 Constitution because, upon information and belief, it has minimum contacts within the
21 State of Arizona; it has purposefully availed itself of its privileges of transacting business
22 within the State by selling and offering for sale products to its distributors and/or customers

1 situated within the State; and it has committed and continues to commit acts of direct and/or
2 indirect patent infringement in this District as further alleged in this complaint.

3 7. Upon information and belief, venue is proper pursuant to 28 U.S.C. §§ 1391
4 and/or 1400(b), in that Camden is a foreign corporation and may be sued in any judicial
5 district.

6 **PATENT-IN-SUIT: the ‘427 Patent**

7 8. The United States Patent and Trademark Office duly and legally issued the
8 ‘427 Patent on February 18, 2020 (a copy of the ‘427 Patent is attached hereto as Exhibit
9 “A”).

10 9. Independent claim 1 of the ‘427 Patent is directed to a keeper assembly for
11 an electric strike including a housing defining an entry chamber. The electric strike
12 operates in conjunction with a latch of a lockset for a door, wherein the latch has an engaged
13 position and a released position, and wherein the engaged position secures the latch within
14 the entry chamber when the door is in a closed state.

15 10. The keeper assembly in claim 1 of the ‘427 Patent comprises a keeper
16 rotatably mounted to the housing, wherein the keeper includes a keeper base. The keeper
17 is movable between a locked position and an unlocked position, and the keeper retains the
18 latch in the entry chamber when the keeper is in the locked position and the latch is in the
19 engaged position.

20 11. The keeper assembly in claim 1 of the ‘427 Patent further comprises a keeper
21 shim mounted to the keeper base of the keeper. The keeper shim includes an outer face
22 contactable by the latch when the latch is in the engaged position.

1 door in a closed state.

2 19. The electric strike in claim 1 of the '088 Patent comprises a housing and a
3 keeper. The housing defines an entry chamber therein, and includes a housing longitudinal
4 length, a back wall extending along the housing longitudinal length, a bottom panel
5 disposed perpendicular to the back wall, and upstanding first and second side walls
6 disposed perpendicular to both the bottom panel and the back wall. The first and second
7 side walls include respective edges comprising a front profile that joins a front edge and a
8 top edge of each respective side wall edge.

9 20. The keeper set forth in claim 1 of the '088 Patent comprises is rotatably
10 disposed in the entry chamber of the housing between the first side wall and the second
11 side wall of the housing. The keeper includes a keeper longitudinal length and is rotatable
12 about an axis of rotation between a locked position and an unlocked position, wherein the
13 axis of rotation is parallel with the housing longitudinal length.

14 21. The keeper set forth in claim 1 of the '088 Patent includes a keeper base and
15 a ramp element. The ramp element includes a contoured surface that is contactable by the
16 tapered contact face of the latch when the keeper is in said locked position and the door is
17 moved to the closed state. The contoured surface runs along the keeper longitudinal length.
18 The contoured surface of the ramp element extends beyond the front profile of the housing
19 when the keeper is in the locked position to prevent the tapered face of the latch from
20 contacting the front profile of the housing as the door is moved to the closed state.

21 22. HES owns by assignment the entire right, title, and interest in and to the '088
22 Patent, including the right to bring this suit for injunctive relief and damages.

1 31. HES has expended substantial amounts of time, money and resources in
2 marketing, advertising and promoting the electric strikes sold under the HES Marks.

3 32. Beginning in April of 2017 and continuing through the date of this
4 Complaint, HES has marketed its 1500 SeriesTM electric strike under the HES Marks on,
5 among other things, its website, product packaging, banner stands, brochures, print
6 advertising and digital advertising throughout the United States, as part of a marketing and
7 advertising campaign that has cost HES hundreds of thousands of dollars.

8 33. Between 2017 and 2022, HES has also promoted its 1500 SeriesTM electric
9 strike under the HES Marks by, among other things, attending trade shows, distributor
10 expositions and counter days throughout the United States, investing approximately
11 \$250,000 to \$500,000 a year in such events.

12 34. Since 2017, as a result of HES' high quality, excellent reputation and
13 extensive investment in promotion and marketing, it has sold thousands of its 1500
14 SeriesTM electric strikes throughout the United States, resulting in millions of dollars of
15 revenue.

16 35. By reason of its widespread, continuous, and exclusive use of the HES Marks
17 to identify its electric strikes and HES as their source, HES owns valid and subsisting
18 statutory and common law rights in the HES Marks.

19 36. HES' trade area under the HES Marks includes, but is not limited to, is the
20 entire United States.

21 37. The HES Marks are distinctive to both the consuming public and in
22 plaintiff's trade in the United States.

1 38. The electric strikes HES offers under the HES Marks are of a high quality
2 and are known for such in the electric door strike and electric door strike accessories
3 industry.

4 39. By reason of HES' extensive expenditures and efforts, the HES Marks have
5 come to signify the high quality of the goods designated by the HES Marks, and acquired
6 incalculable distinction, reputation and goodwill belonging exclusively to HES.

7 **AS FOR A FIRST CAUSE OF ACTION, PLAINTIFF ALLEGES:**

8 **Infringement of the '427 Patent**

9 40. HES repeats and re-alleges the allegations of paragraphs "1" through "39" as
10 if more fully set forth herein.

11 41. Upon information and belief, Camden has in the past, and continues to, make
12 use, sell, offer for sale, and/or import into the United States its own Series 1500 Electric
13 Strikes that both directly and indirectly infringe the '427 Patent in violation of 35 U.S.C. §
14 271(a), (b), and/or (c).

15 42. During an examination of a Model CX-ED1500-L2 of Camden's 1500 Series
16 Electric Strikes ("the Examined Model"), each and every element of certain claims of the
17 '427 Patent were found in the Examined Model.

18 43. Specifically, in violation of 35 U.S.C. § 271(a), Camden has infringed and is
19 infringing claims 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 21, 22 and 23 of
20 the '427 Patent, either literally or under the doctrine of equivalents, by making, using,
21 selling, offering for sale and/or importing into the United States, without authority, the
22 Camden Series 1500 Electric Strikes.

1 44. Upon information and belief, Camden has knowingly induced, and continues
2 to knowingly induce, others to infringe claims 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16,
3 17, 18, 20, 21, 22 and 23 of the '427 Patent in violation of 35 U.S.C. § 271(b), in this
4 District and elsewhere in the United States, by taking active steps with specific intent to
5 encourage and facilitate direct infringement by others, such as by distributors and others in
6 the chain of distribution selling or offering to sell Camden's 1500 Series Electric Strikes
7 and/or by its customers using its 1500 Series Electric Strikes, with knowledge of the
8 distributors' and customers' infringement.

9 45. Camden has encouraged and facilitated such direct infringement by
10 distributors, their customers, and others in the chain of distribution, by contracting for the
11 distribution of Camden's 1500 Series Electric Strikes, by marketing, promoting, and
12 advertising its 1500 Series Electric Strikes on its website, and by creating and publishing
13 installation instructions for installing and using its 1500 Series Electric Strikes that are
14 included in the packaging along with Camden's 1500 Series Electric Strikes and displayed
15 on Camden's website.

16 46. Upon information and belief, Camden, with knowledge of the '427 Patent,
17 has contributorily infringed, and continues to contributorily infringe, claims 1, 2, 3, 4, 5, 6,
18 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 20, 21, 22 and 23 of the '427 Patent in violation of 35
19 U.S.C. § 271(c) by selling and/or offering to sell, in this District and elsewhere in the
20 United States, its 1500 Series Electric Strikes, and facilitating the sale or offer for sale its
21 1500 Series Electric Strikes by its distributors and others in the chain of distribution, and,
22 in turn, use of its 1500 Series Electric Strikes by Camden's customers.

1 47. This sale and offer for sale of Camden’s 1500 Series Electric Strikes by its
2 and/or others in the chain of distribution, and, in turn, use by Camden’s customers,
3 embodies a material part of the infringing method described in claims 16, 17 and 18 of the
4 ‘427 Patent (“the Infringing Method”).

5 48. Camden's 1500 Series Electric Strikes are specially made or specially
6 adapted for use in practicing the invention set forth in claims 1, 2, 3, 4, 5, 6, 7, 9, 10, 11,
7 12, 13, 14, 16, 17, 18, 20, 21, 22 and 23 of the ‘427 Patent and are not staple articles suitable
8 for a commercially significant non-infringing use.

9 49. The sale and offer for sale of the Camden's 1500 Series Electric Strikes by
10 Camden and it’s distributors, and the use of Infringing Products by Camden's customers to
11 perform the Infringing Method constitutes direct infringement of the ‘427 Patent.

12 50. Camden knowingly continues to make, use, sell, offer to sell, and import into
13 the United States products that infringe claims 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 16,
14 17, 18, 20, 21, 22 and 23 of the ‘427 Patent.

15 51. Pursuant to 35 U.S.C. § 287(a), Camden received notice of the ‘427 patent
16 in 2020.

17 52. HES has been and continues to be damaged by Camden’s infringement of
18 the ‘427 Patent in an amount to be determined at trial.

19 53. HES has suffered irreparable injury for which there is no adequate remedy at
20 law and will continue to suffer such irreparable injury unless Camden’s infringement of
21 the ‘427 Patent is enjoined by this Court.

22 54. Upon information and belief, Camden's infringement is willful because

1 Camden has knowingly infringed and continues to, knowingly infringe the ‘427 Patent.

2 55. Camden's infringement of the ‘427 Patent is exceptional and entitles HES to
3 attorneys’ fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

4 **AS AND FOR A SECOND CAUSE OF ACTION, PLAINTIFF ALLEGES:**

5 **Infringement of the ‘088 Patent**

6 56. HES repeats and re-alleges paragraphs “1” through “55” as if more fully set
7 forth herein.

8 57. Upon information and belief, Camden has in the past, and continues to, make,
9 use, sell, offer for sale, and/or import into the United States, without authority, its 1500
10 Series Electric Strikes that both directly and indirectly infringe the claims of the ‘088 Patent
11 in violation of 35 U.S.C. § 271(a), (b), and/or (c).

12 58. During an examination of the Examined Model, each and every element of
13 claims 1 through 13 of the ‘088 Patent were found in the Examined Model.

14 59. Specifically, in violation of 35 U.S.C. § 271(a), Camden has infringed and is
15 infringing claims 1 through 13 of the ‘088 Patent, either literally or under the doctrine of
16 equivalents, by making, using, selling, offering for sale and/or importing into the United
17 States, without authority, its Series 1500 Electric Strikes.

18 60. Upon information and belief, Camden has knowingly induced, and continues
19 to knowingly induce, others to infringe the ‘088 Patent in violation of 35 U.S.C. § 271(b),
20 in this District and elsewhere in the United States, by taking active steps with specific intent
21 to encourage and facilitate direct infringement by others, such as by distributors and others
22 in the chain of distribution selling or offering to sell Camden’s 1500 Series Electric Strikes

1 and/or by its customers using the its 1500 Series Electric Strikes, with knowledge of the
2 distributors' and customers' infringement.

3 61. Camden has encouraged and facilitated such direct infringement by
4 distributors, their customers, and others in the chain of distribution, by contracting for the
5 distribution of Camden's 1500 Series Electric Strikes, by marketing, promoting, and
6 advertising its 1500 Series Electric Strikes on its website, and by creating and publishing
7 installation instructions for installing and using its 1500 Series Electric Strikes that are
8 included in the packaging along with Camden's 1500 Series Electric Strikes and displayed
9 on Camden's website.

10 62. Upon information and belief, Camden, with knowledge of the '088 Patent,
11 has contributorily infringed, and continues to contributorily infringe, claims 1 through 13
12 of the '088 Patent, in violation of 35 U.S.C. § 271(c) by selling and/or offering to sell, in
13 this District and elsewhere in the United States, its 1500 Series Electric Strikes, and
14 facilitating the sale or offer for sale its 1500 Series Electric Strikes by its distributors and
15 others in the chain of distribution, and, in turn, use of its 1500 Series Electric Strikes by
16 Camden's customers, knowing them to be especially made or especially adapted for
17 practicing the invention of the '088 Patent and are not staple articles suitable for a
18 commercially significant non-infringing use.

19 63. Camden knowingly continues to make, use, sell, and offer to sell products
20 that infringe claims 1 through 13 of the '088 Patent.

21 64. Pursuant to 35 U.S.C. § 287(a), Camden received notice of the '088 patent
22 in 2020.

1 65. HES has been and continues to be damaged by Camden’s infringement of
2 the ‘088 Patent in an amount to be determined at trial.

3 66. HES has suffered irreparable injury for which there is no adequate remedy at
4 law and will continue to suffer such irreparable injury unless Camden’s infringement of
5 the ‘088 Patent is enjoined by this Court.

6 67. Upon information and belief, Camden’s infringement is willful because
7 Camden has knowingly infringed and continues to knowingly infringe the ‘088 Patent.

8 68. Camden’s infringement of the ‘088 Patent is exceptional and entitles HES to
9 attorneys’ fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

10 **AS AND FOR A THIRD CAUSE OF ACTION, PLAINTIFF ALLEGES:**

11 **Infringement of the ‘416 Patent**

12 69. HES repeats and re-alleges paragraphs “1” through “68” as if more fully set
13 forth herein.

14 70. Upon information and belief, Camden has in the past, and continues to, make,
15 use, sell, offer for sale, and/or import into the United States, without authority, its 1500
16 Series Electric Strikes that infringe the ‘416 Patent in violation of 35 U.S.C. §§ 171 and
17 289.

18 71. During an examination of the Examined Model, each and every ornamental
19 feature claimed in the ‘416 Patent was found in the Examined Model.

20 72. Specifically, in violation of 35 U.S.C. §§ 271(a) and 289, Camden has
21 infringed and is infringing the ‘416 Patent by making, using, selling, offering for sale
22 and/or importing into the United States, without authority, its 1500 Series Electric Strikes.

1 73. An ordinary observer or purchaser would find the overall design set forth in
2 the '416 Patent and Camden's 1500 Series Electric Strikes substantially similar and
3 mistakenly purchase Camden's 1500 Series Electric Strikes.

4 74. Upon information and belief, Camden has knowingly induced, and continues
5 to knowingly induce, others to infringe the '416 Patent in violation of 35 U.S.C. §§ 271(b)
6 and 289, in this District and elsewhere in the United States, by taking active steps with
7 specific intent to encourage and facilitate direct infringement by others, such as by
8 distributors and others in the chain of distribution selling or offering to sell Camden's 1500
9 Series Electric Strikes and/or by its customers using the its 1500 Series Electric Strikes,
10 with knowledge of the distributors' and customers' infringement.

11 75. Camden has encouraged and facilitated such direct infringement by its
12 distributors, their customers, and others in the chain of distribution, by contracting for the
13 distribution of the 1500 Series Electric Strikes, by marketing, promoting, and advertising
14 the 1500 Series Electric Strikes on Camden's website, and by creating and publishing
15 installation instructions for installing and using its 1500 Series Electric Strikes that are
16 included in the packaging along with Camden's 1500 Series Electric Strikes and displayed
17 on Camden's website.

18 76. Camden knowingly continues to make, use, sell, and offer to sell products
19 that infringe the '416 Patent.

20 77. Pursuant to 35 U.S.C. § 287(a), Camden received notice of the '416 patent
21 in 2017.

22 78. HES has been and continues to be damaged by Camden's infringement of

1 the '416 Patent and seeks an amount to be determined at trial, including, but not limited to,
2 additional remedies under 35 U.S.C. § 289.

3 79. HES has suffered irreparable injury for which there is no adequate remedy at
4 law and will continue to suffer such irreparable injury unless Camden's infringement of the
5 '416 Patent is enjoined by this Court.

6 80. Upon information and belief, Camden's infringement is willful because it has
7 knowingly infringed and continues to knowingly infringe the '416 Patent.

8 81. Camden's infringement of the '416 Patent is exceptional and entitles HES to
9 attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

10 **AS AND FOR A FOURTH CAUSE OF ACTION, PLAINTIFF ALLEGES:**

11 **Injunction (35 U.S.C. § 283)**

12 82. HES repeats and re-alleges paragraphs "1" through "81" as if more fully set
13 forth herein.

14 83. As alleged above, Camden made, used, sold, offered to sell and/or imported
15 1500 Series Electric Strikes which infringe one or more claims of the '427, '088 and '416
16 Patents and continue to do so in violation of HES' rights, for which there is no adequate
17 remedy at law.

18 84. Unless Camden is permanently enjoined from making, using, selling,
19 offering to sell and/or importing the 1500 Series Electric Strikes, HES will suffer
20 irreparable harm.

21 85. As a result of the foregoing, HES is entitled to a permanent injunction, in
22 accordance with 35 U.S.C. § 283, enjoining and restraining Camden from making, using,

1 selling, offering to sell and/or importing any 1500 Series Electric Strikes or other strikes
2 which infringe upon one or more claims of the ‘427, ‘088 and ‘416 Patents.

3 86. HES is entitled to a judgment, declaring that Camden has infringed, and
4 continues to infringe one or more claims of the ‘427, ‘088 and ‘416 Patents and further
5 declaring the respective rights and responsibilities of the parties.

6 **AS AND FOR A FIFTH CAUSE OF ACTION, PLAINTIFF ALLEGES:**

7 **(Unfair Competition – 11 U.S.C. § 1125(a))**

8 87. HES repeats and re-alleges paragraphs “1” through “86” as if more fully set
9 forth herein.

10 88. HES has common law ownership rights in HES’ Marks.

11 89. In an effort to trade upon HES’ Marks, reputation and goodwill, Camden not
12 only infringed the ‘427, ‘088 and ‘416 Patents through the manufacture, use, sale, offer for
13 sale and/or importation of its 1500 Series Electric Strikes as mentioned above (“Infringing
14 Products”), Camden also adopted the confusingly similar “CX-ED1500 Series,” “CX-
15 ED1500,” “CX-ED1500L2,” “CX-ED1500L2-Pac1,” “CX-ED1500L2-Pac2,” “CX-
16 ED1500L2-Pac3,” “CX-ED1500LP” and “CX-ED1500LP-Pac1” marks (collectively
17 “Infringing Marks”) in association with the Infringing Products.

18 90. Upon information and belief, Camden began offering its Infringing Products
19 under the Infringing Marks in interstate commerce in July of 2022, approximately five (5)
20 years after HES had adopted and made continuous use of HES’ Marks in commerce
21 throughout the United States.

22 91. HES obtained rights in HES’ Marks long before Camden began using the

1 Infringing Marks.

2 92. Camden’s unauthorized use in commerce of the Infringing Marks, in
3 connection with the sale of its infringing products, it is likely to deceive customers as to
4 the origin, source, sponsorship, or affiliation of Camden’s offerings, and is likely to cause
5 consumers to believe, contrary to fact, that Camden’s offerings are sold, authorized,
6 endorsed, or sponsored by HES or that HES is in some way affiliated with Camden.

7 93. Alternatively, Camden’s unauthorized use in commerce of the Infringing
8 Marks in connection with the sale of its Infringing Products is likely to deceive consumers
9 as to the origin, source, sponsorship or affiliation of HES’ offerings, and is likely to cause
10 consumers to believe, contrary to fact, that HES’ offerings are sold, authorized, endorsed,
11 or sponsored by Camden, or that Camden is in some way affiliated with or sponsored by
12 HES.

13 94. Camden’s unauthorized use in commerce of the Infringing Marks in
14 connection with its Infringing Products constitutes use of a false designation of origin and
15 misleading description and representation of fact.

16 95. Camden’s conduct constitutes unfair competition in violation of Section
17 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

18 96. Camden’s conduct is willful and is intended to and is likely to cause
19 confusion, mistake, or deception as to the affiliation, connection, or association of HES
20 with Camden or Camden with HES.

21 97. Camden committed the foregoing acts with full knowledge of HES’ Marks
22 and HES’ prior rights in HES’ Marks.

1 98. Camden’s conduct is causing immediate and irreparable harm and injury to
2 HES and to its goodwill and reputation and will continue to both damage HES and confuse
3 the public unless enjoined by this Court.

4 99. HES has no adequate remedy at law.

5 100. Accordingly, HES is entitled to, among relief, injunctive relief and an award
6 of actual damages, Camden’s profits, enhanced damages, reasonable attorney’s fees, and
7 costs of the action under Sections 34 and 35 of the Lanham Act, 15 U.S.C. §§ 1116 and
8 1117, together with pre-judgment and post-judgment interest.

9 **AS AND FOR A SIXTH CAUSE OF ACTION, PLAINTIFF ALLEGES:**

10 **(Common Law Trademark Infringement and Unfair Competition)**

11 101. HES repeats and re-alleges paragraphs “1” through “100” as if more fully set
12 forth herein.

13 102. Camden’s conduct violates HES’ common law trademark rights and
14 constitutes unfair competition.

15 103. The public recognizes HES as the source of the products marketed and
16 promoted under HES’ Marks.

17 104. Camden’s actions are likely to cause confusion, or mistake, or to deceive as
18 to Camden’s affiliation connection, or association with HES, or as to the origin,
19 sponsorship, or approval of its commercial activities.

20 105. Alternatively, Camden’s actions are likely to cause confusion, or mistake, or
21 to deceive as to HES’ affiliation, connection, or association with Camden, or as to the
22 origin, sponsorship, or approval of its commercial activities.

1 106. Camden committed these acts maliciously and in conscious disregard of HES
2 rights.

3 **WHEREFORE**, the plaintiff, Hanchett Entry Systems, Inc., requests judgment as
4 follows:

5 A. Declaring that the one or more claims of United States Patent No.
6 10,563,427 have been infringed by Camden and/or by third parties to whose infringement
7 Camden has contributed and/or by third parties whose infringement has been induced by
8 Camden;

9 B. Declaring that the one or more claims of United States Patent
10 No. 10,794,088 have been infringed by Camden and/or by third parties to whose
11 infringement Camden contributed and/or by third parties whose infringement has been
12 induced by Camden;

13 C. Declaring that the claim of United States Patent No. D794,416 has
14 been infringed by Camden and/or by third parties to whose infringement Camden has
15 contributed and/or by third parties whose infringement has been induced by Camden;

16 D. Declaring that Camden has infringed upon HES' trademark rights;

17 E. Granting a permanent injunction, restraining and adjoining Camden
18 and its officers, directors, agents, servants, employees, and all others in perfidy, concert or
19 participation with them or on their behalf, from further acts of patent infringement,
20 including the manufacturer, use, sale/offering for sale, and importation of infringing
21 devices, methods, systems, and manufactures;

22 F. For preliminary and permanent injunctive relief ordering Camden and

1 its employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries, and
2 assigns, and any and all persons or entities acting in concert with Camden to:

3 1. Immediately cease and desist from engaging in any further acts
4 of trademark infringement, false designation of origin, and
5 unfair competition including, without limitation, offering,
6 marketing, advertising, promoting, or authorizing any third-
7 party to offer, market, advertise, or promote any goods or
8 services bearing the Infringing Marks or any other marks that
9 is confusingly similar to or a variation of or colorable imitation
10 of the HES Marks;

11 2. Immediately cease and desist from making or displaying any
12 statement, representation, or depiction that is likely to lead to
13 the public or the trade to believe that (a) Camden's offerings
14 are in any manner approved endorsed, licensed, sponsored,
15 authorized, or franchised by or associated, affiliated, or
16 otherwise connected with HES or (b) HES' offerings are in any
17 manner approved, endorsed, licensed, sponsored, authorized,
18 or franchised by or associated, affiliated, or otherwise,
19 connected with Camden.

20 3. Refrain from registering or applying to register any trademark,
21 service mark, domain name, trade name, or other source
22 identifier or symbol of origin consisting or of incorporating the

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HES Marks or any other mark that infringes or is likely to be confused with the HES Marks;

G. Granting an accounting for damages adequate to compensate plaintiff for infringement of one or all of the ‘427 Patent, ‘088 Patent, ‘416 Patent and HES’ trademark rights, with such damages for infringement of the ‘427 and ‘088 Patents to be trebled to the extent allowed by law due to the willful and deliberate character of the infringement and damages for infringement of the ‘416 Patent to include the doubling of lost profits under 35 U.S.C. § 289.

H. Awarding to plaintiff all other compensatory damages suffered as a result of Camden’s actions;

I. Awarding to plaintiff attorneys fees and costs;

J. Further declaring the respective rights and responsibilities of the parties; and

K. Awarding the plaintiff such other and further relief as to this Court may seem just and proper.

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DEMAND FOR JURY TRIAL

Plaintiff, Hanchett Entry Systems, Inc., hereby requests a trial by jury on all issues so triable.

DATED: January 11, 2023

WOODS OVIATT GILMAN LLP

By: s/ Dennis B. Danella
Dennis B. Danella, Esq.
1900 Bausch & Lomb Place
Rochester, New York 14604
+1.585.987.2919
ddanella@woodsoviatt.com

Attorney for Plaintiff