UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

LURACO HEALTH & BEAUTY, LLC,	§	**JURY TRIAL DEMANDED**
Plaintiff,	§	
	§	**Case No.** 3:22-cv-2604
v.	§	
	§	
CHRISTOPHER LAC LUONG,	§	
SAM NGUYEN,	§	
LEXOR STORE, LLC	§	
PRO SPA DEPOT, LLC	§	
Defendants,	§	

LURACO HEALTH & BEAUTY, LLC'S COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Luraco Health & Beauty, LLC herein seeks redress for patent infringement by Christopher Luong, his wife, Sam Nguyen, as well as multiple companies they own in the spa industry which violate U.S. patent law, 35 U.S.C. § 1, et seq., for their direct infringement and inducement of others to infringe and contribute to the infringement of Plaintiff's patents by making, using, offering to sell, or selling in the United States, or importing into the United States, products or processes that practice inventions claimed in U.S. Patent No. 9,926,933, U.S. Patent No. 10,215,178, U.S. Patent No. 10,302,088, U.S. Patent No. 10,288,071, and U.S. Patent No. 10,215,177 (collectively, "the Asserted Patents").

This suit (Lexor 3) is related to case no. 3:18-CV-01933-S, pending in the Northern District of Texas (Lexor 1), which involves the same patents against two other defendants owned by Christopher Lac Luong. A motion to join the two cases is expected. Concurrently filed is another suit against the combined defendants of this suit and Lexor 2 for their infringement of two other related patents. Plaintiff expects to file a motion to join all three suits, to efficiently resolve all patent infringement by all of Luong's companies of all of Plaintiff's patents.

I. PARTIES

1. Plaintiff Luraco Health and Beauty, LLC ("Luraco") is a Texas corporation with a principal place of business in Arlington, Texas.

2. Defendant Christopher Lac Luong resides at 2810 Pecan Meadow Dr, Garland, TX 75040, where he may be served. He was a director of Lexor, Inc. when its certificate was forfeited and is thus liable in his individual capacity for claims herein alleged against Lexor, Inc. under sections 171.252 and 255 of the Texas Tax Code from June 24, 2022, until corporate privileges are restored.

3. Defendant Sam Nguyen resides at 12364 Littlefield Dr, Frisco, TX 75035, where she may be served. She was a director of Lexor, Inc. when its certificate was forfeited and is thus responsible directly for the claims herein alleged against Lexor, Inc. under sections 171.252 and 255 of the Texas Tax Code from June 24, 2022, until corporate privileges are restored.[1]

4. Defendant Lexor Store, LLC ("Lexor Store") is a Texas limited liability company. Though its mailing address is 14800 Goldenwest St., Westminister, CA 92683, its registered agent is Christopher Lac Luong, at 2810 Pecan Meadow Dr, Garland, TX 75040, or the address above.

5. Defendant Pro Spa Depot, LLC ("Pro Spa") is a Texas limited liability company operating at 1330 Jupiter Rd., Suite 200, Garland, TX 75042, where it may be served through its registered agent, Vy Bui, or its governing manager, Christopher Lac Luong, at the same address.

II. JURISDICTION AND VENUE

6. These claims arise under the patent laws of the United States, 35 U.S.C. § 1 et seq. and the Declaratory Judgment Act, 28 U.S.C. §§ 2201–2202. This Court has subject matter jurisdiction over these claims pursuant to 28 U.S.C. §§ 1331, 1338(a), and 2201(a).

[1] Christopher Lac Luong and Sam Nguyen appear to be a married couple.

7. This Court has personal jurisdiction over individual defendants Christopher Lac Luong and Sam Nguyen, as they both reside in the Northern District of Texas.

8. This Court has personal jurisdiction over business defendants Lexor Store and Spa Depot as they were formed in Texas and operate in Garland, Texas, within the Northern District of Texas.

9. In this document, all the defendants are corporately referenced as "Defendants."

III. FACTUAL BACKGROUND

10. Luraco owns all right, title, and interest in the US Patent No. 9,926,933 ("the '933 patent") issued on March 27, 2018, which disclosed an improved bearing and shaft assembly and associated jet assembly, housing, and methods. A copy of the '933 patent is attached as Exhibit 1 and corresponding infringement disclosures in Exhibit 2.

11. Luraco owns all right, title, and interest in the US Patent No. 10,288,071 ("the '071 patent") issued May 14, 2019, which disclosed an improved bearing and shaft assembly and associated jet assembly, housing, and methods. A copy of the '071 patent is shown in Exhibit 3 and corresponding infringement disclosures in Exhibit 4.

12. Luraco owns all right, title, and interest in the US Patent No. 10,302,088 ("the '088 patent") issued on May 28, 2019, which disclosed an improved spa pump and associated jet assembly, housing, and methods. A copy of the '088 patent is shown in Exhibit 5 and corresponding infringement disclosures in Exhibit 6.

13. Luraco owns all right, title, and interest in the US Patent No. 10,215,177 ("the '177 patent") issued on February 26, 2019, which disclosed an improved spa pump and associated jet assembly, housing, and methods. A copy of the '177 patent is shown in Exhibit 7 and corresponding infringement disclosures in Exhibit 8.

14. Luraco owns all right, title, and interest in the US Patent No. 10,215,178 ("the '178 patent") which disclosed an improved bearing and shaft assembly and associated jet assembly, housing, and methods. A copy of the '178 patent is shown in Exhibit 9 and corresponding infringement disclosures in Exhibit 10.

15. Lexor Store sells pedicure spas that use the infringing spa pumps.

16. Pro Spa Depot, LLC is a direct manufacture that manufactures and sells pedicure spas that use the infringing spa pumps. Pro Spa Depot, LLC also sells and offers for sale the infringing spa pumps. Specifically, Pro Spa Depot, LLC, sells, and offers for sale a water jet pump identified for sale as an "EcoJet II Magnetic Drive" on Lexor's website[2] shown in the following image:

[2] https://prospadepot.com/ecojet-magnetic-ii.html; all URL web pages were last checked on November 15, 2022.

17. Defendants are directly infringing and inducing others to infringe and contributing to the infringement of the Asserted Patents by making, using, and offering to sell in or import to the United States products which practice apparatus and methods claimed in the Asserted Patents. All the defendant companies are owned by the same individual, Christopher Luong[3]. Specifically, Lexor, Inc. markets, manufactures, uses, sells, and offers for sale a water jet pump identified for sale as an "EcoJet Magnetic Drive" on Lexor's website[4] and as eBay Product ID 578829908 ("Accused Product"), shown on the following photographs:

18. Based upon the images above it is clear that the Defendants are making, using, offering to sell, and selling the Accused Products.

[3] Various documents will spell Christopher Luong's name as "Long" because he used that spelling until recently.
[4] https://lexor.com/spa-parts/ecojet-magnetic-jet-drive-pipeless-whirlpool.html#

19. Defendants have willfully infringed the Asserted Patents. Lexor, Inc. purchased Luraco's products so that Lexor, Inc. could test Luraco's design. An email between Luraco and Lexor, Inc. attached as Exhibit 11 shows that Lexor was testing the Luraco "Magna-Jet," "Dura-Jet III," and "Discharge Pump." A copy of the Lexor Inc.'s order invoice can be seen in Exhibit 12. Lexor, Inc. began producing a magnetically driven spa jet shortly after receiving the Luraco products. It can be deduced from the facts above that Lexor, Inc. used information from testing the Luraco products to make the Accused Products. Defendants have continued to infringe unabated to the present.

20. Lexor, Inc., Ecojet, Inc., and Lexor Manufacturing, LLC are all owned and managed by Christopher Luong and Sam Nguyen. The Defendants are therefore aware of cause no. 3:18-CV-01933-S, pending in the Northern District of Texas, in which Lexor Manufacturing is a plaintiff against Luraco, Inc. and Luraco Health and Beauty, LLC. Defendants are also aware of the Asserted Patents through their affiliated businesses, Lexor, Inc, Ecojet, Inc., and Lexor Manufacturing, LLC, which includes but is not limited to the purchase of Luraco's products, which are currently involved in the federal case earlier referenced as Lexor I.

21. All the Defendants infringing products can be seen in Exhibit 13.

IV. INFRINGEMENT ALLEGATIONS CONCERNING LURACO'S PATENTS.

A. CLAIM - Infringement of the '933 Patent

22. Luraco owns all right, title, and interest in the '933 patent, issued on March 27, 2018. A copy of the '933 patent is attached as Exhibit 1.

23. Defendants directly infringe and induce others to infringe and contribute to the infringement and continue to infringe, literally or under the doctrine of equivalents, at least claims 1-64 of the '933 patent by making, using, importing, exporting, offering to sell, and selling water

jet pumps, including the Accused Products, in the United States. Exhibit 2 describes the infringement of the claims of the ‘933 patent by the Accused Product.

24. Defendants’ infringement of the '933 patent has caused, and continues to cause, Plaintiff irreparable harm for which there is no adequate remedy at law, unless the Court enjoins Defendants from continuing its infringing activities.

25. Defendants’ infringement has injured Luraco and Luraco is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

26. Defendants are infringing claims 1-64 of the '933 patent, as described below:

i. Claim 1:

27. Specifically, the Accused Product includes a sleeve-type, bearing assembly comprising an outer bearing member and a sleeve-type, inner bearing member.

28. Further, the aforementioned outer bearing member comprises a body comprising a first end, a second end, and a cavity extending from said first end to said second end, the cavity of said body is dimensioned and configured for receiving said sleeve-type, inner bearing member wherein said outer bearing member is dimensioned and configured for fitting within a cavity of a magnetic impeller of the jet assembly of the magnetic coupling-type pump used for displacing the fluid to the environment, and wherein said outer bearing member is manufactured of a plastic material or engineered plastics.

29. Further, Accused Product’s aforementioned sleeve-type, inner bearing member comprises a body comprising a first end, a second end, and a cavity extending from said first end to said second end of said body of said sleeve-type, inner bearing member, wherein said sleeve-type, inner bearing member is dimensioned and configured for fitting within said cavity of said body of said outer bearing member and within the cavity of the magnetic impeller of the jet assembly, and

wherein said sleeve-type, inner bearing member is manufactured of rubber or a rubber-like material.

30. Further, Accused Product's aforementioned outer bearing member and said sleeve-type, inner bearing member, when in operational use, are positioned adjacent to one another and are aligned axially with one another.

31. Further, Accused Product's aforementioned shaft assembly comprising a shaft member and a shaft protection member, wherein said shaft assembly is adapted for being secured at a predetermined location within a housing of the jet assembly.

32. Further, the Accused Product 's aforementioned shaft protection member comprises a body comprising a first end, a second end, and a cavity extending from said first end to said second end of said body of said shaft protection member, wherein said cavity of said body of said shaft protection member is dimensioned and configured for receiving said shaft member, wherein said shaft protection member is dimensioned and configured for fitting within said cavity of said body of said sleeve-type, inner bearing member and within the cavity of the magnetic impeller of the jet assembly, and wherein said shaft protection member is manufactured of a hard material.

33. Further, Accused Product's aforementioned shaft member comprises a body comprising a first end and a second end, and wherein said shaft member is dimensioned and configured for fitting within said cavity of said body of said shaft protection member and within the cavity of the magnetic impeller of the jet assembly.

34. Further, Accused Product's aforementioned shaft member, when in operational use, said shaft member and said shaft protection member are positioned within said cavity of said body of said sleeve-type, inner bearing member, which is positioned within said cavity of said body of said outer bearing member.

35. Further, the Accused Product, when in operational use, the aforementioned outer bearing member, said sleeve-type, inner bearing member, said shaft protection member, and said shaft member are all positioned within the cavity of the magnetic impeller of the jet assembly, wherein (again when in operational use), the magnetic impeller of the jet assembly is rotatory within the housing of the jet assembly such that fluid is displaced to the environment.

ii. Claim 2

36. The Accused Product comprises the improved bearing and shaft assembly described previously under Claim 1, wherein said shaft protection member further comprises a base comprising a cavity, and wherein said body of said shaft protection member extends upwardly from said base of said shaft protection member, and wherein said cavity of said base of said shaft protection member is dimensioned and configured for receiving said shaft member.

iii. Claim 3

37. The Accused Product includes the improved bearing and shaft assembly as described previously, wherein said base of said shaft protection member has a central hole.

iv. Claim 4

38. The Accused Product includes an improved bearing and shaft *supra* under Claim 1, wherein said hard material of said shaft protection member is ceramic or a ceramic-type material.

v. Claim 5

39. The Accused Product includes the improved bearing and shaft assembly *supra* under Claim 1, wherein said shaft protection member is polished.

vi. Claim 6

40. The Accused Product includes the improved bearing and shaft assembly *supra* under Claim 1, wherein said shaft assembly is secured about a center of an inner surface of a bottom of the housing of the jet assembly.

vii. Claim 7

41. The Accused Product includes the improved bearing and shaft assembly *supra* under Claim 1, wherein said shaft assembly and said bearing assembly align an axis of rotation of the magnetic impeller with an axis of rotation of a driving magnetic plate mounted to a motor, and wherein said shaft assembly is secured to a bottom of the housing of the jet assembly and said bearing assembly is secured to the center of the magnetic impeller within the housing of the jet assembly.

viii. Claim 8

42. The Accused Product includes the improved bearing and shaft assembly *supra* under Claim 2, wherein a portion of said outer bearing member and said first end of said body of said sleeve-type, inner bearing member are substantially flush with a rear side of the magnetic impeller when said outer bearing member and said sleeve-type, inner bearing member are positioned within the cavity of the magnetic impeller of the jet assembly.

ix. Claim 9

43. The Accused Product includes the improved bearing and shaft assembly described *supra* under Claim 8, wherein said outer bearing member further comprises a base comprising a cavity, wherein said body of said outer bearing member extends upwardly from said base of said outer bearing member, and wherein said cavity of said base of said outer bearing member is dimensioned and configured for receiving said sleeve-type, inner bearing member.

x. Claim 10

44. The Accused Product includes an improved bearing and shaft assembly as described *supra* under Claim 2, wherein said shaft assembly is secured about a center of an inner surface of a bottom of the housing of the jet assembly.

xi. Claim 11

45. The Accused Product includes an improved bearing and shaft assembly as described *supra* under Claim 2, wherein said shaft assembly and said bearing assembly align an axis of rotation of the magnetic impeller with an axis of rotation of a driving magnetic plate mounted to a motor, and wherein said shaft assembly is secured to a bottom of the housing of the jet assembly and said bearing assembly is secured to the center of the magnetic impeller within the housing of the jet assembly.

xii. Claim 12

46. The Accused Product includes an improved bearing and shaft assembly as described *supra* under Claim 1, wherein, when in operational use, said shaft assembly is stationary.

xiii. Claim 13

47. The Accused Product includes an improved bearing and shaft assembly as described *supra* under Claim 1, wherein said shaft member is manufactured of steel or a metal material.

xiv. Claim 14

48. The Accused Product includes an improved bearing and shaft assembly as described *supra* under Claim 1, wherein a base of said shaft protection member has a central hole.

xv. Claim 15

49. The Accused Product includes an improved bearing and shaft assembly as described *supra* under Claim 1, wherein the fluid is displaced to a spa environment.

xvi. Claim 16

50. The Accused Product includes an improved bearing and shaft assembly as described *supra* under Claim 2, wherein the fluid is displaced to a spa environment.

xvii. Claim 17

51. The Accused Product includes an improved bearing and shaft assembly as described *supra* under Claim 9, wherein said base of said outer bearing member has a central hole.

xviii. Claim 18

52. The Accused Product includes an improved bearing and shaft assembly adapted for use in a jet assembly of a magnetic coupling-type pump used for displacing a fluid to an environment, said improved bearing and shaft assembly comprising a sleeve-type, bearing assembly comprising an outer bearing member and a sleeve-type, inner bearing member, wherein said outer bearing member comprises a body that comprises a first end, a second end, and a cavity extending from said first end to said second end, wherein said cavity of said body is dimensioned and configured for receiving said sleeve-type, inner bearing member, and wherein said outer bearing member is dimensioned and configured for fitting within a cavity of a magnetic impeller of the jet assembly of the magnetic coupling-type pump used for displacing the fluid to the environment, wherein said sleeve-type, inner bearing member comprises a body comprising a first end, a second end, and a cavity extending from said first end to said second end of said body of said sleeve-type, inner bearing member, and wherein said sleeve-type, inner bearing member is dimensioned and configured for fitting within said cavity of said body of said outer bearing member and within the

cavity of the magnetic impeller of the jet assembly, and wherein said outer bearing member and said sleeve-type, inner bearing member, when in operational use, are positioned adjacent to one another and are aligned axially with one another; and a shaft assembly comprising a shaft member and a shaft protection member, wherein said shaft assembly is adapted for being secured at a predetermined location within a housing of the jet assembly.

53. Further, The Accused Product 's aforementioned shaft protection member comprises a base and a body extending upwardly from said base of said shaft protection member, wherein said base of said shaft protection member comprises a cavity, wherein said body of said shaft protection member comprises a first end, a second end, and a cavity extending from said first end to said second end of said body of said shaft protection member, wherein each of said cavity of said base and said cavity of said body of said shaft protection member is dimensioned and configured for receiving said shaft member, and wherein said shaft protection member is dimensioned and configured for fitting within said cavity of said body of said sleeve-type, inner bearing member and within the cavity of the magnetic impeller of the jet assembly, wherein said shaft member comprises a body that comprises a first end and a second end, and wherein said shaft member is dimensioned and configured for fitting within said cavity of said body of said shaft protection member and within the cavity of the magnetic impeller of the jet assembly, wherein, when in operational use, said shaft member and said shaft protection member are positioned within said cavity of said body of said sleeve-type, inner bearing member, which is positioned within said cavity of said body of said outer bearing member, wherein, when in operational use, said outer bearing member, said sleeve-type, inner bearing member, said shaft protection member, and said shaft member are all positioned within the cavity of the magnetic impeller of the jet assembly, and

wherein, when in operational use, the magnetic impeller of the jet assembly is rotatory within the housing of the jet assembly such that fluid is displaced to the environment.

xix. Claim 19

54. The Accused Product includes an improved bearing and shaft assembly described by Claim 18 as described *supra*, wherein said base of said shaft protection member has a central hole.

xx. Claim 20

55. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, wherein said outer bearing member is manufactured of a plastic material or engineered plastics.

xxi. Claim 21

56. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, the improved bearing and shaft assembly according to claim 18, wherein said sleeve-type, inner bearing member is manufactured of rubber or a rubber-like material.

xxii. Claim 22

57. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, wherein said shaft member is manufactured of steel or a metal material.

xxiii. Claim 23

58. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, wherein said shaft protection member is manufactured of a hard material.

xxiv. Claim 24

59. The Accused Product includes an improved bearing and shaft assembly described by Claim 23, wherein said hard material is ceramic or a ceramic-type material.

xxv. Claim 25

60. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, wherein said shaft protection member is polished.

xxvi. Claim 26

61. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, engineered plastics, wherein said sleeve-type, inner bearing member is manufactured of rubber or a rubber-like material, wherein said shaft member is manufactured of steel or a metal material, and wherein said shaft protection member is manufactured of a hard material.

xxvii. Claim 27

62. The Accused Product includes an improved bearing and shaft assembly described by Claim 26, wherein said hard material is ceramic or a ceramic-type material.

xxviii. Claim 28

63. The Accused Product includes an improved bearing and shaft assembly described by Claim 26, wherein said shaft protection member is polished.

xxix. Claim 29

64. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, wherein said shaft assembly is secured about a center of an inner surface of a bottom of the housing of the jet assembly.

xxx. Claim 30

65. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, wherein said shaft assembly and said bearing assembly align an axis of rotation of the magnetic impeller with an axis of rotation of a driving magnetic plate mounted to a motor, and wherein said

shaft assembly is secured to a bottom of the housing of the jet assembly and said bearing assembly is secured to the center of the magnetic impeller within the housing of the jet assembly.

xxxi. Claim 31

66. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, wherein said outer bearing member further comprises a base, wherein said base of said outer bearing member and said first end of said body of said sleeve-type, inner bearing member are substantially flush with a rear side of the magnetic impeller when said outer bearing member and said sleeve-type, inner bearing member are positioned within the cavity of the magnetic impeller of the jet assembly.

xxxii. Claim 32

67. The Accused Product includes an improved bearing and shaft assembly described by Claim 31, wherein at least one of said base of said outer bearing member and said base of said shaft protection member is a base having a central hole.

xxxiii. Claim 33

68. The Accused Product includes an improved bearing and shaft assembly described by Claim 31, wherein said shaft assembly is secured about a center of an inner surface of a bottom of the housing of the jet assembly.

xxxiv. Claim 34

69. The Accused Product includes an improved bearing and shaft assembly described by Claim 31, wherein said shaft assembly and said bearing assembly align an axis of rotation of the magnetic impeller with an axis of rotation of a driving magnetic plate mounted to a motor, and wherein said shaft assembly is secured to a bottom of the housing of the jet assembly and said bearing assembly is secured to the center of the magnetic impeller within the housing of the jet assembly.

xxxv. Claim 35

70. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, wherein, when in operational use, said shaft assembly is stationary.

xxxvi. Claim 36

71. The Accused Product includes an improved bearing and shaft assembly described by Claim 18, wherein the fluid is displaced to a spa environment.

xxxvii. Claim 37

72. The Accused Product includes an improved bearing and shaft assembly described by Claim 31, wherein the fluid is displaced to a spa environment.

xxxviii. Claim 38

73. The Accused Product comprises a jet assembly of a magnetic coupling-type pump used for displacing a fluid to an environment, said jet assembly comprising a housing comprising at least one inlet aperture and at least one outlet aperture and defining a chamber, wherein said at least one inlet aperture is disposed about said housing and is dimensioned and configured to allow a fluid to pass through said at least one inlet aperture and enter into said chamber of said housing, and wherein said at least one outlet aperture is disposed about said housing and is dimensioned and configured to allow the fluid to pass through said at least one outlet aperture and exit from said chamber of said housing into the environment.

74. Further, The Accused Product comprises a magnetic impeller defining a cavity, wherein said magnetic impeller is positioned within said chamber of said housing and configured to rotate within said chamber of said housing whereby rotation of said magnetic impeller causes the fluid to flow through said at least one inlet aperture and enter into said chamber of said housing and to flow through said at least one outlet aperture and exit from said chamber of said housing.

75. Further, The Accused Product comprises an improved bearing and shaft assembly comprising a sleeve-type, bearing assembly and a shaft assembly, wherein said sleeve-type, bearing assembly comprises an outer bearing member and a sleeve-type, inner bearing member, wherein said outer bearing member comprises a body that comprises a first end, a second end, and a cavity extending from said first end to said second end, wherein said cavity of said body is dimensioned and configured for receiving said sleeve-type, inner bearing member, and wherein said outer bearing member is dimensioned and configured for fitting within said cavity of said magnetic impeller, wherein said sleeve-type, inner bearing member comprises a body comprising a first end, a second end, and a cavity extending from said first end to said second end of said body of said sleeve-type, inner bearing member, and wherein said sleeve-type, inner bearing member is dimensioned and configured for fitting within said cavity of said body of said outer bearing member and within said cavity of said magnetic impeller, wherein said outer bearing member and said sleeve-type, inner bearing member, when in operational use, are positioned adjacent to one another and are aligned axially with one another, wherein said shaft assembly comprises a shaft member and a shaft protection member, wherein said shaft assembly is adapted for being secured at a predetermined location within said housing of said jet assembly, wherein said shaft member comprises a body that comprises a first end and a second end, and wherein said shaft member is dimensioned and configured for fitting within said cavity of said body of said shaft protection member and within said cavity of said magnetic impeller, wherein said shaft protection member comprises a base and a body extending upwardly from said base of said shaft protection member, wherein said base of said shaft protection member comprises a cavity, wherein said body of said shaft protection member comprises a first end, a second end, and a cavity extending from said first end to said second end of said body of said shaft protection member, wherein each of said cavity

of said base and said cavity of said body of said shaft protection member is dimensioned and configured for receiving said shaft member, and wherein said shaft protection member is dimensioned and configured for fitting within said cavity of said body of said sleeve-type, inner bearing member and within said cavity of said magnetic impeller, wherein, when in operational use, said shaft member and said shaft protection member are positioned within said cavity of said body of said sleeve-type, inner bearing member, which is positioned within said cavity of said body of said outer bearing member, wherein, when in operational use, said outer bearing member, said sleeve-type, inner bearing member, said shaft protection member, and said shaft member are all positioned within said cavity of said magnetic impeller, and wherein, when in operational use, said magnetic impeller is rotatory within said housing of said jet assembly such that fluid is displaced to the environment.

xxxix. Claim 39

76. The Accused Product includes an improved bearing and shaft assembly described by Claim 38, wherein said base of said shaft protection member is a base having a central hole.

xl. Claim 40

77. The Accused Product includes an improved bearing and shaft assembly described by Claim 38, wherein said outer bearing member is manufactured of a plastic material or engineered plastics.

xli. Claim 41

78. The Accused Product includes an improved bearing and shaft assembly described by Claim 38, wherein said sleeve-type, inner bearing member is manufactured of rubber or a rubber-like material.

xlii. Claim 42

79. The Accused Product includes an improved bearing and shaft assembly described by Claim 38, wherein said shaft member is manufactured of steel or a metal material.

xliii. Claim 43

80. The Accused Product includes an improved bearing and shaft assembly described by Claim 38, wherein said shaft protection member is manufactured of a hard material.

xliv. Claim 44

81. The Accused Product includes an improved bearing and shaft assembly described by Claim 43, wherein said hard material is ceramic or a ceramic-type material.

xlv. Claim 45

82. The Accused Product includes an improved bearing and shaft assembly described by Claim 38, wherein said shaft protection member is polished.

xlvi. Claim 46

83. The Accused Product includes an improved bearing and shaft assembly described by Claim 38, wherein said outer bearing member is manufactured of a plastic material or engineered plastics, wherein said sleeve-type, inner bearing member is manufactured of rubber or a rubber-like material, wherein said shaft member is manufactured of steel or a metal material, and wherein said shaft protection member is manufactured of a hard material.

xlvii. Claim 47

84. The Accused Product includes an improved bearing and shaft assembly described by Claim 46, wherein said hard material is ceramic or a ceramic-type material.

xlviii. Claim 48

85. The Accused Product includes an improved bearing and shaft assembly described by Claim 46, wherein said shaft protection member is polished.

xlix. Claim 49

86. The Accused Product includes an improved bearing and shaft assembly described by Claim 46, wherein said jet assembly is adapted for being coupled to a motor assembly of the magnetic coupling pump wherein said magnetic impeller comprises a magnetic pole array, wherein the motor assembly comprises a motor, a magnetic pole array, and a motor shaft member adapted for being rotated such that a magnetic field generated by the magnetic pole array of the motor assembly moves or fluctuates in accordance with the rotation of the magnetic pole array of the motor assembly, wherein the motor drives the magnetic pole array, wherein the magnetic field moves and/or causes rotation of said magnetic pole array of said magnetic impeller, and wherein rotation of said magnetic impeller results in the fluid being drawn towards said magnetic impeller through said at least one inlet aperture and the fluid to be propelled out of said jet assembly through said at least one outlet aperture.

l. Claim 50

87. The Accused Product includes a magnetic coupling-type pump used for displacing a fluid to an environment, said pump comprising: 1) a motor assembly comprising a motor; and 2) a jet assembly comprising a housing comprising at least one inlet aperture and at least one outlet aperture and defining a chamber, wherein said at least one inlet aperture is disposed about said housing and is dimensioned and configured to allow a fluid to pass through said at least one inlet aperture and enter into said chamber of said housing, and wherein said at least one outlet aperture

is disposed about said housing and is dimensioned and configured to allow the fluid to pass through said at least one outlet aperture and exit from said chamber of said housing into the environment.

88. Further, the aforementioned magnetic impeller defining a cavity, wherein said magnetic impeller is positioned within said chamber of said housing and configured to rotate within said chamber of said housing whereby rotation of said magnetic impeller causes the fluid to flow through said at least one inlet aperture and enter into said chamber of said housing and to flow through said at least one outlet aperture and exit from said chamber of said housing.

89. Further, the Accused Product includes an improved bearing and shaft assembly comprising a sleeve-type, bearing assembly and a shaft assembly, wherein said sleeve-type, bearing assembly comprises an outer bearing member and a sleeve-type, inner bearing member, wherein said outer bearing member comprises a body that comprises a first end, a second end, and a cavity extending from said first end to said second end, wherein said cavity of said body is dimensioned and configured for receiving said sleeve-type, inner bearing member, and wherein said outer bearing member is dimensioned and configured for fitting within said cavity of said magnetic impeller, wherein said sleeve-type, inner bearing member comprises a body comprising a first end, a second end, and a cavity extending from said first end to said second end of said body of said sleeve-type, inner bearing member, and wherein said sleeve-type, inner bearing member is dimensioned and configured for fitting with said cavity of said body of said outer bearing member and within said cavity of said magnetic impeller, wherein said outer bearing member and said sleeve-type, inner bearing member, when in operational use, are positioned adjacent to one another and are aligned axially with one another, wherein said shaft assembly comprises a shaft member and a shaft protection member, wherein said shaft assembly is adapted for being secured at a predetermined location within said housing of said jet assembly, wherein said shaft member comprises a body

that comprises a first end and a second end, and wherein said shaft member is dimensioned and configured for fitting within said cavity of said body of said shaft protection member and within said cavity of said magnetic impeller, wherein said shaft protection member comprises a base and a body extending upwardly from said base of said shaft protection member, wherein said base of said shaft protection member comprises a cavity, wherein said body of said shaft protection member comprises a first end, a second end, and a cavity extending from said first end to said second end of said body of said shaft protection member, wherein each of said cavity of said base and said cavity of said body of said shaft protection member is dimensioned and configured for receiving said shaft member, and wherein said shaft protection member is dimensioned and configured for fitting within said cavity of said body of said sleeve-type, inner bearing member and within said cavity of said magnetic impeller, wherein, when in operational use, said shaft member and said shaft protection member are positioned within said cavity of said body of said sleeve-type, inner bearing member, which is positioned within said cavity of said body of said outer bearing member, wherein, when in operational use, said outer bearing member, said sleeve-type, inner bearing member, said shaft protection member, and said shaft member are all positioned within said cavity of said magnetic impeller, and wherein, when in operational use, said magnetic impeller is rotatory within said housing of said jet assembly such that fluid is displaced to the environment.

li. Claim 51

90. The Accused Product includes the magnetic coupling-type pump according to Claim 50, wherein said outer bearing member is manufactured of a plastic material or engineered plastics.

lii. Claim 52

91. The Accused Product includes the magnetic coupling-type pump according to Claim 50, wherein said sleeve-type, inner bearing member is manufactured of rubber or a rubber-like material.

liii. Claim 53

92. The Accused Product includes the magnetic coupling-type pump according to Claim 50, wherein said shaft member is manufactured of steel or a metal material.

liv. Claim 54

93. The Accused Product includes the magnetic coupling-type pump according to Claim 50, wherein said shaft protection member is manufactured of a hard material.

lv. Claim 55

94. The Accused Product includes the magnetic coupling-type pump according to Claim 54, wherein said hard material is ceramic or a ceramic-type material.

lvi. Claim 56

95. The Accused Product includes the magnetic coupling-type pump according to Claim 50, wherein said shaft protection member is polished.

lvii. Claim 57

96. The Accused Product includes the magnetic coupling-type pump according to Claim 50, wherein said outer bearing member is manufactured of a plastic material or engineered plastics, wherein said sleeve-type, inner bearing member is manufactured of rubber or a rubber-like material, wherein said shaft member is manufactured of steel or a metal material, and wherein said shaft protection member is manufactured of a hard material.

lviii. Claim 58

97. The Accused Product includes the magnetic coupling-type pump according to Claim 57, wherein said hard material is ceramic or a ceramic-type material.

lix. Claim 59

98. The Accused Product includes the magnetic coupling-type pump according to Claim 57, wherein said shaft protection member is polished.

lx. Claim 60

99. The Accused Product includes the magnetic coupling-type pump according to Claim 50, wherein said magnetic impeller comprises a magnetic pole array, wherein said motor assembly further comprises a magnetic pole array and a motor shaft member adapted for being rotated such that a magnetic field generated by said magnetic pole array of said motor assembly moves or fluctuates in accordance with the rotation of said magnetic pole array of said motor assembly, wherein said motor drives said magnetic pole array of said motor assembly, wherein said magnetic field moves and/or causes rotation of said magnetic pole array of said magnetic impeller, and wherein rotation of said magnetic impeller results in the fluid being drawn towards said magnetic impeller through said at least one inlet aperture and the fluid to be propelled out of said jet assembly through said at least one outlet aperture.

lxi. Claim 61

100. The Accused Product practices a method for displacing a fluid to an environment using an improved bearing and shaft assembly for a jet assembly of a magnetic coupling-type pump, said method comprising the steps of:

a. securing an improved bearing and shaft assembly at a predetermined location within a housing of jet assembly, wherein said improved bearing and shaft assembly comprises a

sleeve-type, bearing assembly and a shaft assembly, wherein said sleeve-type, bearing assembly comprises an outer bearing member and a sleeve-type, inner bearing member, wherein said shaft assembly comprises a shaft member and a shaft protection member, wherein said outer bearing member comprises a body comprising a first end, a second end, and a cavity extending from said first end to said second end, wherein said cavity of said body is dimensioned and configured for receiving said sleeve-type, inner bearing member, and wherein said outer bearing member is dimensioned and configured for fitting within a cavity of a magnetic impeller of the jet assembly of the magnetic coupling-type pump used for displacing the fluid to the environment, wherein said sleeve-type, inner bearing member comprises a body comprising a first end, a second end, and a cavity extending from said first end to said second end of said body of said sleeve-type, inner bearing member, and wherein said sleeve-type, inner bearing member is dimensioned and configured for fitting within said cavity of said body of said outer bearing member and within the cavity of the magnetic impeller of the jet assembly, wherein said outer bearing member and said sleeve-type, inner bearing member, when in operational use, are positioned adjacent to one another and are aligned axially with one another, wherein said shaft assembly is adapted for being secured at a predetermined location within the housing of the jet assembly, wherein said shaft member comprises a body comprising a first end and a second end, and wherein said shaft member is dimensioned and configured for fitting within said cavity of said body of said shaft protection member and within the cavity of the magnetic impeller of the jet assembly, wherein said shaft protection member comprises a base and a body extending upwardly from said base of said shaft protection member, wherein said base of said shaft protection member comprises a cavity, wherein said body of said shaft protection member

comprises a first end, a second end, and a cavity extending from said first end to said second end of said body of said shaft protection member, wherein each of said cavity of said base and said cavity of said body of said shaft protection member is dimensioned and configured for receiving said shaft member and wherein said shaft protection member is dimensioned and configured for fitting within said cavity of said body of said sleeve-type, inner bearing member and within the cavity of the magnetic impeller of the jet assembly, wherein, when in operational use, said shaft member and said shaft protection member are positioned within said cavity of said body of said sleeve-type, inner bearing member, which is positioned within said cavity of said body of said outer bearing member, wherein, when in operational use, said outer bearing member, said sleeve-type, inner bearing member, said shaft protection member, and said shaft member are all positioned within the cavity of the magnetic impeller of the jet assembly, and wherein, when in operational use, the magnetic impeller of the jet assembly is rotatory within the housing of the jet assembly such that fluid is displaced to the environment;

b. causing rotation of the magnetic impeller positioned within a chamber defined by the housing of the jet assembly;

c. receiving the fluid and allowing the fluid to pass through at least one input aperture disposed about the housing of the jet assembly;

d. disturbing the fluid with the rotating magnetic impeller; and

e. outputting the fluid through at least one output aperture disposed about the housing of the jet assembly such that the fluid is displaced to the environment.

lxii. Claim 62

101. The Accused Product practices a method for displacing a fluid to an environment using an improved bearing and shaft assembly for a jet assembly of a magnetic coupling-type pump which comprises the steps described supra under Claim 61 wherein said outer bearing member further comprises a base comprising a cavity, wherein said body of said outer bearing member extends upwardly from said base of said outer bearing member, and wherein said cavity of said base of said outer bearing member is dimensioned and configured for receiving said sleeve-type, inner bearing member, and wherein said shaft member further comprises a base, wherein said body of said shaft member extends upwardly from said base of said shaft member.

lxiii. Claim 63

102. The Accused Product practices a method for displacing a fluid to an environment using an improved bearing and shaft assembly for a jet assembly of a magnetic coupling-type pump which comprises the steps described supra under Claim 61, wherein the jet assembly is adapted for being coupled to the magnetic coupling-type pump, wherein the magnetic impeller comprises a magnetic pole array, wherein a motor assembly of the magnetic coupling pump comprises a motor, a magnetic pole array, and a motor shaft member adapted for being rotated such that a magnetic field generated by the magnetic pole array of the motor assembly moves or fluctuates in accordance with the rotation of the magnetic pole array of the motor assembly, wherein the motor drives the magnetic pole array of the motor assembly, wherein the magnetic field moves and/or causes rotation of the magnetic pole array of the magnetic impeller, and wherein rotation of the magnetic impeller results in the fluid being drawn towards the magnetic impeller through the at least one inlet aperture and the fluid to be propelled out of the jet assembly through the at least one outlet aperture.

lxiv. Claim 64

103. The Accused Product practices a method for displacing a fluid to an environment using an improved bearing and shaft assembly for a jet assembly of a magnetic coupling-type pump which comprises the steps described supra under Claim 61, wherein said outer bearing member is manufactured of a plastic material or engineered plastics, wherein said sleeve-type, inner bearing member is manufactured of rubber or a rubber-like material, wherein said shaft member is manufactured of steel or a metal material, and wherein said shaft protection member is manufactured of a hard material.

104. As a result of Defendants' unlawful infringement of the '933 patent, Luraco has suffered and will continue to suffer damage. Luraco is entitled to recover from the Defendants the damages suffered by Luraco as a result of Defendants' unlawful acts.

105. Defendants intend to continue its unlawful infringing activity, and Luraco continues to and will continue to suffer irreparable harm – for which there is no adequate remedy at law – from such unlawful infringing activity unless Defendants are enjoined by this Court.

B. CLAIM - Infringement of the '071 Patent

106. Luraco owns all right, title, and interest in the '071 patent, issued on May 14, 2019. A copy of the '071 patent is attached as Exhibit 3.

107. Defendants directly infringe and induce others to infringe and contribute to the infringement and continue to infringe, literally or under the doctrine of equivalents, at least claims 1-19, 22-23, 25-26, and 28-30, of the '071 patent by making, using, importing, exporting, offering to sell, and selling water jet pumps, including the Accused Products, in the United States. Exhibit 4 describes the infringement of the claims of the '071 patent by the accused product.

108. Defendants' infringement of the '071 patent is willful, as agents for Defendants purchased Luraco's products so that Defendants could copy Luraco's design. Defendants have continued to infringe unabated to the present.

109. Defendants' infringement of the '071 patent has caused, and continues to cause, Plaintiff irreparable harm for which there is no adequate remedy at law, unless the Court enjoins Defendants from continuing its infringing activities.

110. Defendants' infringement has injured Luraco and Luraco is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

C. CLAIM - Infringement of the '088 Patent

111. Luraco owns all right, title, and interest in the '088 patent, issued May 28, 2019. A copy of the '088 patent is attached as Exhibit 5.

112. Defendants directly infringe and induce others to infringe and contribute to the infringement and continue to infringe, literally or under the doctrine of equivalents, at least claims 43-56 and 58-68 of the '088 patent by making, using, importing, exporting, offering to sell, and selling water jet pumps, including the Accused Products, in the United States. Exhibit 6 describes the infringement of the claims of the '088 patent by the accused product.

113. Defendants' infringement of the '088 patent has caused, and continues to cause, Plaintiff irreparable harm for which there is no adequate remedy at law, unless the Court enjoins Defendants from continuing its infringing activities.

114. Defendants' infringement has injured Luraco and Luraco is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

D. CLAIM - Infringement of the ’177 Patent

115. Luraco owns all right, title, and interest in the ‘177 patent, issued on February 26, 2019. A copy of the ‘177 patent is attached as Exhibit 7.

116. Defendants directly infringe and induce others to infringe and contribute to the infringement and continue to infringe, literally or under the doctrine of equivalents, at least claims 1-30 of the ‘177 patent by making, using, importing, exporting, offering to sell, and selling water jet pumps, including the Accused Products, in the United States. Exhibit 8 describes the infringement of the claims of the ‘177 patent by the accused product.

117. Defendants’ infringement of the ‘177 patent has caused, and continues to cause, Plaintiff irreparable harm for which there is no adequate remedy at law, unless the Court enjoins Defendants from continuing its infringing activities.

118. Defendants’ infringement has injured Luraco and Luraco is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

E. CLAIM - Infringement of the ’178 Patent

119. Luraco owns all right, title, and interest in the ‘178 patent, issued on February 26, 2019. A copy of the ‘178 patent is attached as Exhibit 9.

120. Defendants directly infringe and induce others to infringe and contribute to the infringement and continue to infringe, literally or under the doctrine of equivalents, at least claims 1, 3-9, 11-23, and 25-30 of the ‘178 patent by making, using, importing, exporting, offering to sell, and selling water jet pumps, including the Accused Products, in the United States. Exhibit 10 describes the infringement of the claims of the ‘178 patent by the accused product.

121. Defendants' infringement of the '178 patent has caused, and continues to cause, Plaintiff irreparable harm for which there is no adequate remedy at law, unless the Court enjoins Defendants from continuing its infringing activities.

122. Defendants' infringement has injured Luraco and Luraco is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

F. CONDITIONS PRECEDENT HAVE BEEN MET

123. All conditions precedent have been met. Plaintiff has sent a demand letter to counsel for Defendants concurrent with this filing which presented its claims and beforehand in the associated case of *Lexor v. Luraco*, Cause No. 3:18-cv-01933-N, pending in this district.

G. PRAYER FOR RELIEF

WHEREFORE, Luraco prays for a judgment in its favor and against Defendants which:

a) Declares that Defendants have and are willfully infringing upon Luraco's '933 Patent;

b) Declares that Defendants have and are willfully infringing upon Luraco's '071 Patent;

c) Declares that Defendants have and are willfully infringing upon Luraco's '088 Patent;

d) Declares that Defendants have and are willfully infringing upon Luraco's '177 Patent;

e) Declares that Defendants have and are willfully infringing upon Luraco's '178 Patent;

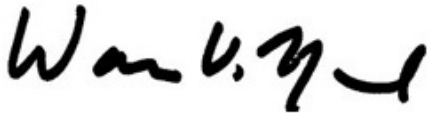
f) Awards Luraco compensatory damages as a result of Defendants' infringement of the '933, '071, '088, '177 and the '178 patents, together with interest and costs, and in no event less than a reasonable royalty;

g) Permanently enjoin Defendants from further infringement pursuant to 35 U.S.C. § 283.

h) Concludes that this is an exceptional case, and awarding to Luraco its expenses, costs, and attorney's fees under 35 U.S.C. § 285.

i) Awarding costs of suit by Luraco and other relief as this Court deems just and equitable.

Respectfully submitted,



Warren V. Norred
NORRED LAW, PLLC
515 E. Border; Arlington, TX 76010
817-704-3984
warren@norredlaw.com
Attorney for Plaintiff

Exhibits Attached:

1 – US Patent 9,926,933
2 – US Patent 9,926,933 - Infringement Disclosures
3 – US Patent 10,288,071
4 – US Patent 10,288,071 - Infringement Disclosures
5 – US Patent 10,302,088
6 – US Patent 10,302,088 - Infringement Disclosures
7 – US Patent 10,215,177
8 – US Patent 10,215,177 - Infringement Disclosures
9 – US Patent 10,215,178
10 – US Patent 10,215,178 - Infringement Disclosures
11 – Lexor Email to Luraco
12 – Lexor Order Invoice
13 – Compilation of Defendant's Infringing Products