

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Tiger Tool International Incorporated, a  
Canadian Corporation,

*Plaintiff,*

v.

One Stop Distributors LLC, a Florida LLC  
d/b/a ONI Tools,

*Defendant.*

No.

Complaint for Patent Infringement

Jury Demand

Plaintiff Tiger Tool International Incorporated brings this action for patent infringement under 35 U.S.C. § 100 *et seq.* against Defendant One Stop Distributors LLC, a Florida LLC d/b/a ONI Tools and alleges as follows:

**I. Parties.**

1. Plaintiff Tiger Tool International Incorporated (“Tiger Tool”) is a corporation organized under the laws the Canadian province of British Columbia, with a principal place of business in Abbotsford, British Columbia, Canada and a place of business in Sumas, Whatcom County, Washington.

2. Defendant One Stop Distributors LLC, a Florida LLC d/b/a ONI Tools (“ONI Tools”) is a Limited Liability Corporation organized under the laws of the state of Florida with a principal place of business in Miami, Florida.

**II. Jurisdiction and Venue.**

3. This Court has jurisdiction over the subject matter of this lawsuit pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over ONI Tools at least because ONI Tools is a Florida LLC with a principle place of business in Florida.

5. Venue is proper in this District under 28 U.S.C. § 1400 because ONI Tools resides in this District.

### III. Facts.

6. Relevant to this lawsuit, Tiger Tool is the sole owner of all right, title, and interest in and to U.S. Patent No. 8,627,557 B2 (the “’557 Patent”), including the right to sue for past, present, and future damages.

7. Founded in 1984, Tiger Tool remains a privately held specialty manufacturing company.

8. Tiger Tool invents tools to make work easier for automotive technicians, and particularly for technicians who work on large, heavy-duty vehicles: over the road trucks, mining equipment, and the like.

9. In many categories, tools invented, designed, and manufactured by Tiger Tool are recognized around the world as setting the standard against which others are measured.

10. Tiger Tool products are so well known as the *de facto* standard that manufacturers who attempt to compete with Tiger Tool routinely market their products as substitutes for Tiger Tool products by part number. Buyers recognize a string of digits as identifying a specific tool or component simply because Tiger Tool first gave that number to the tool.

11. From its inception, Tiger Tool has protected its innovative tools by procuring patent protection for its many inventions.

12. This includes U.S. Pat. No. 8,627,557, filed July 5, 2010, with a priority date of July 17, 2009, and which issued on January 14, 2014 with 537 days of patent term extension pursuant to 35 U.S.C. § 154(b).

13. A true and correct copy of the ’557 Patent is attached as Exhibit A. The claims of the ’557 Patent are valid and enforceable.

14. The ’557 Patent claims an innovative pin puller tool.

15. A pin puller is a tool used to remove the pin that attaches leaf spring suspension to a vehicle frame.

16. Leaf spring suspension is most commonly found on large, heavy-duty vehicles like trucks and buses.

17. Leaf spring suspension is commonly fastened to the vehicle frame by means of a heavy-duty cylindrical pin that passes through an opening in the hanger attached to the frame, a corresponding opening in the leaf spring, and a further opening in the hanger.

18. Suspension for any vehicle endures a tough environment. It is underneath the vehicle, exposed to the roughest elements and road dirt, where it endures constant strain of operation as well as water, dirt, road salt and the like.

19. Unsurprisingly, removing the bushing pin to thereby remove the leaf spring can be a tough task.

20. First, the pin is often in an awkward spot, under the vehicle and amidst numerous other parts of the drive train, suspension, brakes, etc.

21. Second, it is installed with significant force and friction so that it stays in place during use, then endures rough conditions, making it more likely to be stuck worse than when it was installed.

22. In short, it takes a lot of force to remove the pin, force which has to be directed at a pin that is likely in an awkward spot to reach. This is not a task that can be accomplished by simply swinging a hammer harder.

23. Tiger Tool's pin puller makes this task vastly more easy to accomplish than with prior tools.

24. The pin puller of the '557 Patent comprises, in brief, a pull rod that couples to both the pin and to an actuator, for example a hydraulic press. In one embodiment, the pull rod is connected to the pin by a pair of mating shells which fit over detents or similar structures in both the pin and the rod. A similar structure can be mounted on the far end of the pin to keep the multiple parts of the pin assembled, and which may also help guide the pin cleanly through the bushing. The pull rod is then attached to the actuator, such as a hydraulic press cylinder. The press cylinder drives the pull rod which in turn drives the pin, removing it from the bushing.

25. Tiger Tool sells a pin puller, the 15000 Pin Puller, that is an embodiment of the '557 Patent.

26. Tiger Tool also sells various additional parts and components that work with the 15000 Pin Puller to couple it to various different sizes and different manufacture of pins and bushings.

27. ONI Tools sells the “Oni Tools Universal Leaf Pin & Suspension Bushing Remover & Installer Hydraulic Tool”, through its own website and on Amazon.

28. ONI Tools markets the ONI Pin Puller as “a direct replacement for TG 15030 and 50544012,” referring to Tiger Tool’s Pin Puller as adapted to certain specific vehicle’s bushings and pins.

29. The ONI Pin Puller practices each and every limitation of at least Claim One of the ‘557 Patent.

30. ONI Tools is not authorized by license or for any other reason to make, use, sell, import, or offer to sell any product which infringes the ‘557 Patent.

31. The ONI Pin Puller is a pin puller tool.

32. The ONI Pin Puller has a pull rod.

33. The ONI Pin Puller has a coupler for coupling a first end of the pull rod to a first end of a pin to be pulled.

34. The ONI Pin Puller has a puller comprising an actuator configured to apply longitudinal pulling force on the pull rod.

35. The ONI Pin Puller has a follower configured for coupling to a second end of the pin to be pulled.

36. The ONI Pin Puller follower has a face for bearing against a bushing in which the pin to be pulled is embedded.

37. The ONI Pin Puller follower comprises a first pair of mating shells, which, when mated, defining a bore for receiving the second end of the pin, the bore comprising an engagement feature configured to engage the second end of the pin.

**IV. Claim for Relief: Infringement of the '557 Patent.**

38. ONI Tools sells, offers for sale, and imports into the United States, a pin puller that practice at least one claim of the '557 Patent, including at least claim 1.

39. In violation of 35 U.S.C. § 271(a), ONI Tools has infringed and will continue to infringe one or more claims of the '557 Patent, including at least claim 1, by selling, offering for sale, and/or importing into the United States the foregoing product.

40. Tiger Tool has been injured by ONI Tools' infringement of the '557 Patent and will suffer irreparable harm unless ONI Tools is enjoined from infringing the '557 Patent.

**V. Jury Demand.**

41. Tiger Tool demands a trial by jury on all issues so triable.

**VI. Prayer For Relief.**

WHEREFORE, Tiger Tool respectfully requests that the Court enter judgment in its favor on the claim set forth above and respectfully request the following relief:

- (a) Entry of judgment that ONI Tools has infringed at least one claim of the '557 Patent, and continues to do so;
- (b) Entry of an Order against ONI Tools and its affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in concert with it in the form of a temporary, preliminary, and permanent injunction restraining it from the following: (i) making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use any of the products identified in this Complaint and its Exhibits, or determined during discovery and trial of this matter to be infringing, or mere colorable variations thereof, not authorized by Plaintiff; (ii) aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon any claim of the '557 Patent; and (iii) effecting assignments or transfers, forming new entities or associations, or utilizing any other device with the effect of circumventing or otherwise avoiding the prohibitions set forth in items (i) and (ii) of this paragraph;

- (c) Entry of an Order that, upon Tiger Tool's request, third-party online service providers with notice of the injunction, including without limitation Amazon.com, shall disable and cease displaying any advertisements used by or associated with ONI Tools in connection with the sale of goods that infringe the '557 Patent;
- (d) An award of damages to Tiger Tool adequate to compensate it for ONI Tools' infringement of the '557 Patent, and for any continuing or future infringement through the date such judgment is entered, including pre-judgment interest and post-judgment interest, costs, and expenses, as well as an accounting and award of damages against ONI Tools for all future infringing acts occurring after the date such judgment is entered;
- (e) Entry of judgment that ONI Tools infringement of the '557 Patent has been willful and an award as provided by 35 U.S.C. § 284 for treble damages against ONI Tools for its willful infringement of the '557 Patent;
- (f) Entry of judgment as provided by 35 U.S.C. § 285 that this case is exceptional and an award granting Tiger Tool its reasonable attorneys' fees, expenses, and costs; and
- (g) Entry of judgment in favor of Tiger Tool granting any further or additional relief the Court deems just and proper.

Dated: November 2, 2022

/s/ Eric J. Partlow

Eric J. Partlow, Esq.  
Florida Bar No. 556531  
[eric.partlow@arlaw.com](mailto:eric.partlow@arlaw.com)  
[ann.jones@arlaw.com](mailto:ann.jones@arlaw.com)

Adams and Reese LLP  
100 N. Tampa Street, Suite 4000  
Tampa, FL 33602  
Telephone: 813-402-2880  
Facsimile: 813-402-2887

Joel B. Ard (*Pro Hac Vice* forthcoming)  
WSBA # 40104 Ard Law Group PLLC  
P.O. Box 11633  
Bainbridge Island, WA 98110  
206.701.9243  
Joel@Ard.law  
*Attorneys for Plaintiff*