

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

TIGER TOOL INTERNATIONAL  
INCORPORATED, a Canadian Corporation,

*Plaintiff,*

v.

ONE STOP DISTRIBUTORS LLC, a Florida  
LLC d/b/a ONI TOOLS,

*Defendant.*

No. 2:22-cv-1409

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 at 13155 SW 42nd Street, Suite 202, Miami, Florida 33175, and a registered agent for service of process named Catherine Martin, at that address.

1 **II. JURISDICTION AND VENUE.**

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

4 4. This Court has specific and general personal jurisdiction over ONI Tools at least  
5 because ONI Tools has purposefully availed itself of the benefits of doing business in the Western  
6 District of Washington by contracting in this State and judicial district with Amazon.com, Inc.  
7 (“Amazon”) for the purpose of distributing, promoting use of, marketing, selling, and/or offering  
8 for sale the infringing product identified below, and deriving substantial revenue from such  
9 infringing activities by placing those products into the stream of commerce with the expectation  
10 that they will be purchased by consumers within the Western District of Washington.

11 5. On information and belief, a reasonable opportunity for discovery will show that  
12 ONI Tools has conceded that it is subject to the jurisdiction of courts in the State of Washington  
13 and King County at least for disputes between it and Amazon arising out of its sales of any products  
14 on that platform, including the infringing product identified below.

15 6. On information and belief, a reasonable opportunity for discovery will show that  
16 ONI Tools has purposefully availed itself of the jurisdiction of courts in the state of Washington  
17 by virtue of, at least, entering into contracts to business in this State, including sales of the  
18 infringing product identified below.

19 7. ONI Tools commits tortious infringing acts in this District, engages in interstate  
20 commerce to transact business in Washington (including this District), and has caused Plaintiff  
21 substantial injury in the State of Washington (including this District).

22 8. This Court’s exercise of jurisdiction over ONI Tools comports with principals of  
23 fair play and substantial justice.

24 9. Venue is proper in this District under 28 U.S.C. § 1391 because ONI Tools is  
25 subject to personal jurisdiction in this District.

1 **III. FACTS.**

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

5 11. Founded in 1984, Tiger Tool remains a privately held specialty manufacturing  
6 company.

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

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

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

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

18 16. This includes U.S. Pat. No. 8,627,557, filed July 5, 2010, with a priority date of July  
19 17, 2009, and which issued on January 14, 2014 with 537 days of patent term extension pursuant to  
20 35 U.S.C. § 154(b).

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

23 18. The ’557 Patent claims an innovative pin puller tool.

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

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

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

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

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

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

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

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

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

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

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

1 30. Tiger Tool also sells various additional parts and components that work with the  
2 15000 Pin Puller to couple it to various different sizes and different manufacture of pins and  
3 bushings.

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

6 32. ONI Tools markets the ONI Pin Puller as “a direct replacement for TG 15030 and  
7 50544012,” referring to Tiger Tool’s Pin Puller as adapted to certain specific vehicle’s bushings  
8 and pins.

9 33. The ONI Pin Puller practices each and every limitation of at least Claim One of the  
10 ‘557 Patent.

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

13 35. The ONI Pin Puller is a pin puller tool.

14 36. The ONI Pin Puller has a pull rod.

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

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

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

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

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

1                   **IV. CLAIM FOR RELIEF: INFRINGEMENT OF THE '557 PATENT.**

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

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

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

9                   **V. JURY DEMAND.**

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

11                   **VI. PRAYER FOR RELIEF.**

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

14          (a)     Entry of judgment that ONI Tools has infringed at least one claim of the '557  
15 Patent, and continues to do so;

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

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

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