

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**CASE NO.**

RAMPWERKS, LLC, a Texas limited liability  
Company,

Plaintiff,

vs.

J & B IMPORTERS, INC., a Florida Corporation,

Defendant.

**PLAINTIFF’S ORIGINAL COMPLAINT AND JURY DEMAND**

J & B Importers, Inc. (“J & B”) imports, distributes, and/or sells specialty chainrings made by absoluteBLACK for high-performance bicycles. In so doing, J & B infringes several patents owned by RampWerks, LLC.

RampWerks files this suit for infringement of U.S. Patent Nos. 10,677,338, 10,711,875, and 11,460,099 and seeks redress for the damage it has suffered as a result of J & B’s infringement.

**PARTIES**

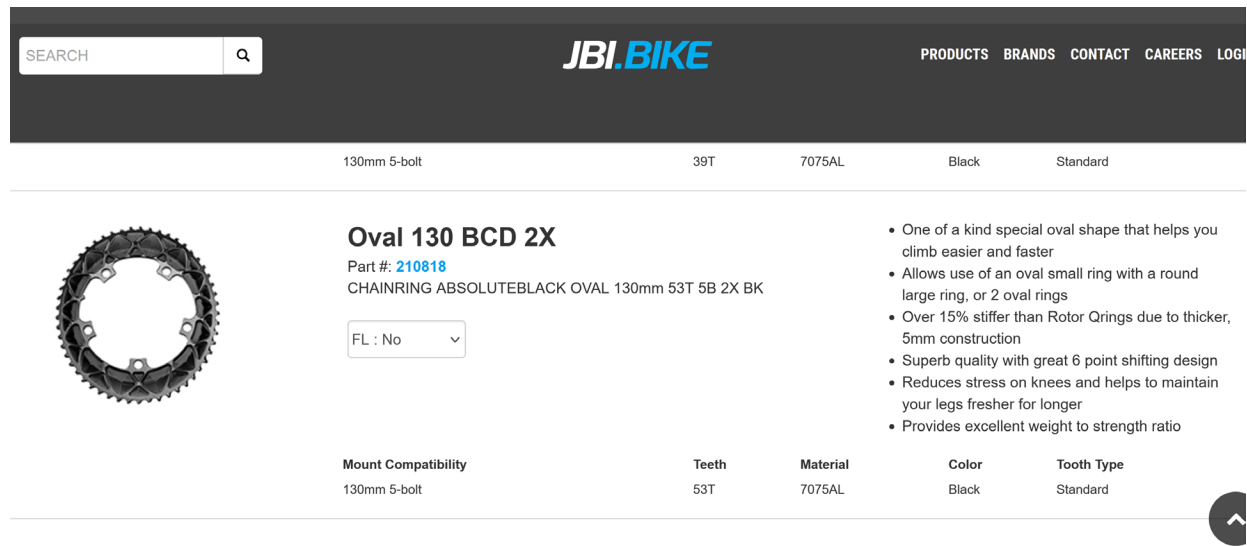
1. Plaintiff and patent owner RampWerks, LLC is a limited liability corporation formed under the laws of Texas with a principal place of business at 6900 North Dallas Freeway, 3rd floor, Plano, TX 75024.

2. Defendant J & B Importers, Inc. is a corporation formed under the laws of Florida with a principal place of business at 11925 S.W. 128th street, Miami, Florida

33186.

3. J & B Importers, Inc. conducts business in this district, selling and distributing bicycles and bicycle components including the chainring products that infringe the RampWerks patents to retailers who in turn resell to the public.

4. J & B markets the infringing products via its website, which is directed to consumers in this district and throughout the State of Texas. See <https://www.jbi.bike/site/>.



[https://www.jbi.bike/site/search\\_result.php?keywords=absoluteblack](https://www.jbi.bike/site/search_result.php?keywords=absoluteblack).

5. J & B Importers, Inc. may be served with process through its registered agent, Crystal Marini, at 11925 S.W. 128th street, Miami, Florida 33186.

### JURISDICTION AND VENUE

6. This is an action for patent infringement arising under the Patent Act, 35 U.S.C. § 1 *et seq.*

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

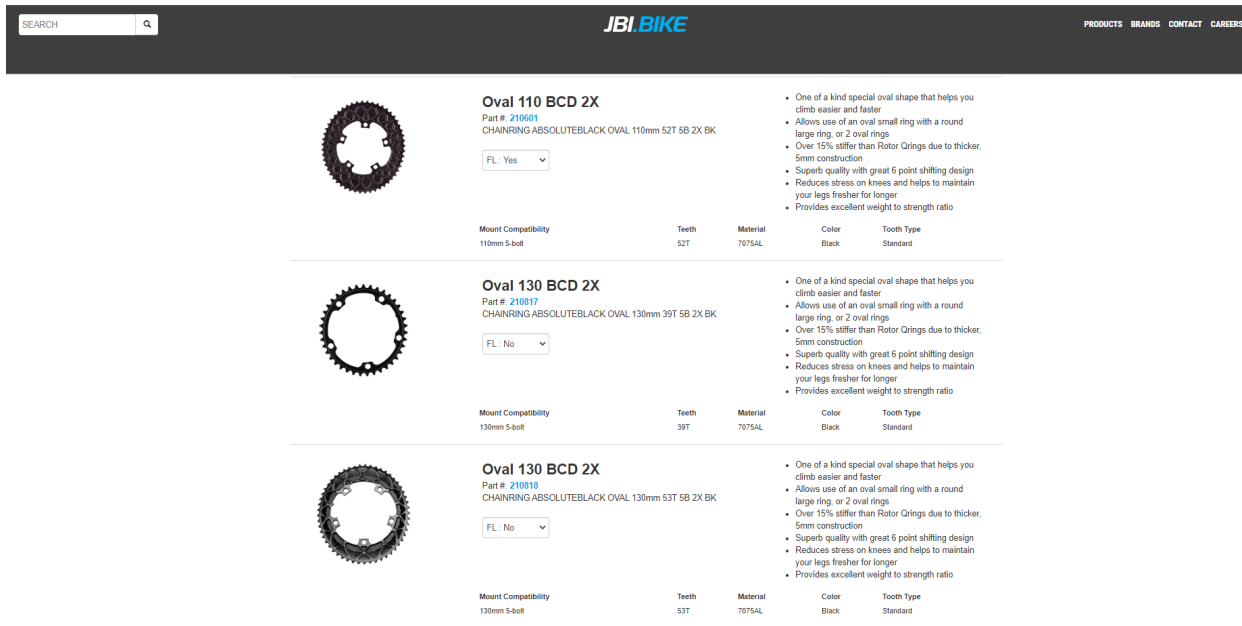
8. This Court has personal jurisdiction over the Defendant under the laws of the State of Florida, due at least to its substantial business in Florida and in this judicial district, including: (a) at least part of the infringing activities alleged herein; and (b) regularly doing or soliciting business, engaging in other persistent conduct, and/or deriving substantial revenue from goods sold and services provided to Florida residents.

9. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(b) because Defendant resides in this district, markets, sells, and delivers accused products in this district, directs and instructs customers and end users how to use the accused products in this district, and has committed acts of infringement in this district.

10. RampWerks, LLC has suffered damages in this district due to J & B's infringing conduct.

### **ACCUSED PRODUCTS**

11. J & B Importers, Inc. markets and sells various models of bicycle chainrings that practice one or more claims of the asserted RampWerks patents (the "absoluteBLACK bicycle chainrings") including, without limitation, the AbsoluteBlack Training Oval 110 BCD 2X, Oval Direct Boost 148 36T, Oval 96mm 34T 4B XT-M8000/MT700, Oval 96mm 34T 4B, Oval 94mm 34T, Oval 130 BCD 2X, Oval 110 BCD 2X, 110 BCD Asymmetric 2X R9100/8000, Oval 110 BCD Subcompact, Oval 104 BCD N/W, and 104 BCD N/W.



**Oval 110 BCD 2X**  
 Part # **21001**  
 CHAINRING ABSOLUTEBLACK OVAL 110mm 52T 5B 2X BK  
 FL: Yes

- One of a kind special oval shape that helps you climb easier and faster
- Allows use of an oval small ring with a round large ring, or 2 oval rings
- Over 15% stiffer than Rotor Crings due to thicker, 5mm construction
- Superb quality with great 6 point shifting design
- Reduces stress on knees and helps to maintain your legs fresher for longer
- Provides excellent weight to strength ratio

Mount Compatibility	Teeth	Material	Color	Tooth Type
110mm 5-bolt	52T	7075AL	Black	Standard

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**Oval 130 BCD 2X**  
 Part # **21017**  
 CHAINRING ABSOLUTEBLACK OVAL 130mm 39T 5B 2X BK  
 FL: No

- One of a kind special oval shape that helps you climb easier and faster
- Allows use of an oval small ring with a round large ring, or 2 oval rings
- Over 15% stiffer than Rotor Crings due to thicker, 5mm construction
- Superb quality with great 6 point shifting design
- Reduces stress on knees and helps to maintain your legs fresher for longer
- Provides excellent weight to strength ratio

Mount Compatibility	Teeth	Material	Color	Tooth Type
130mm 5-bolt	39T	7075AL	Black	Standard

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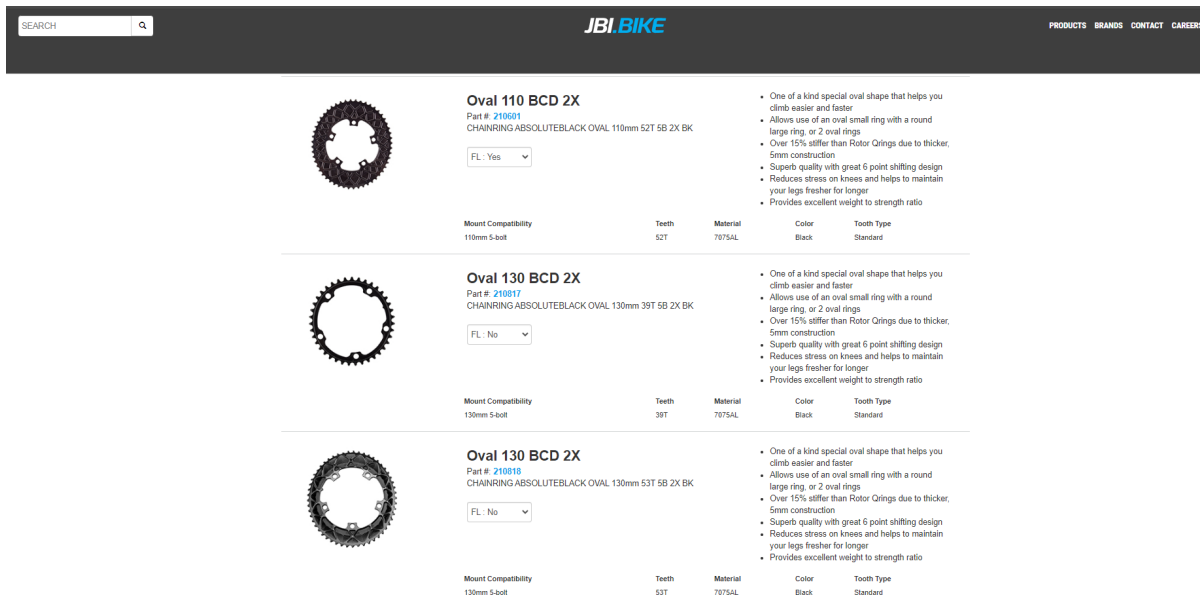
**Oval 130 BCD 2X**  
 Part # **21015**  
 CHAINRING ABSOLUTEBLACK OVAL 130mm 53T 5B 2X BK  
 FL: No

- One of a kind special oval shape that helps you climb easier and faster
- Allows use of an oval small ring with a round large ring, or 2 oval rings
- Over 15% stiffer than Rotor Crings due to thicker, 5mm construction
- Superb quality with great 6 point shifting design
- Reduces stress on knees and helps to maintain your legs fresher for longer
- Provides excellent weight to strength ratio

Mount Compatibility	Teeth	Material	Color	Tooth Type
130mm 5-bolt	53T	7075AL	Black	Standard

[https://www.jbi.bike/site/search\\_result.php?keywords=absoluteblack](https://www.jbi.bike/site/search_result.php?keywords=absoluteblack).

12. J & B Importers, Inc. sells, offers for sale, imports, uses, and/or distributes absoluteBLACK bicycle chainrings that meet each and every limitation of the asserted claims of U.S. Patent Nos. 10,677,338, 10,711,875, and 11,460,099.



**Oval 110 BCD 2X**  
 Part # **21001**  
 CHAINRING ABSOLUTEBLACK OVAL 110mm 52T 5B 2X BK  
 FL: Yes

- One of a kind special oval shape that helps you climb easier and faster
- Allows use of an oval small ring with a round large ring, or 2 oval rings
- Over 15% stiffer than Rotor Crings due to thicker, 5mm construction
- Superb quality with great 6 point shifting design
- Reduces stress on knees and helps to maintain your legs fresher for longer
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Mount Compatibility	Teeth	Material	Color	Tooth Type
110mm 5-bolt	52T	7075AL	Black	Standard

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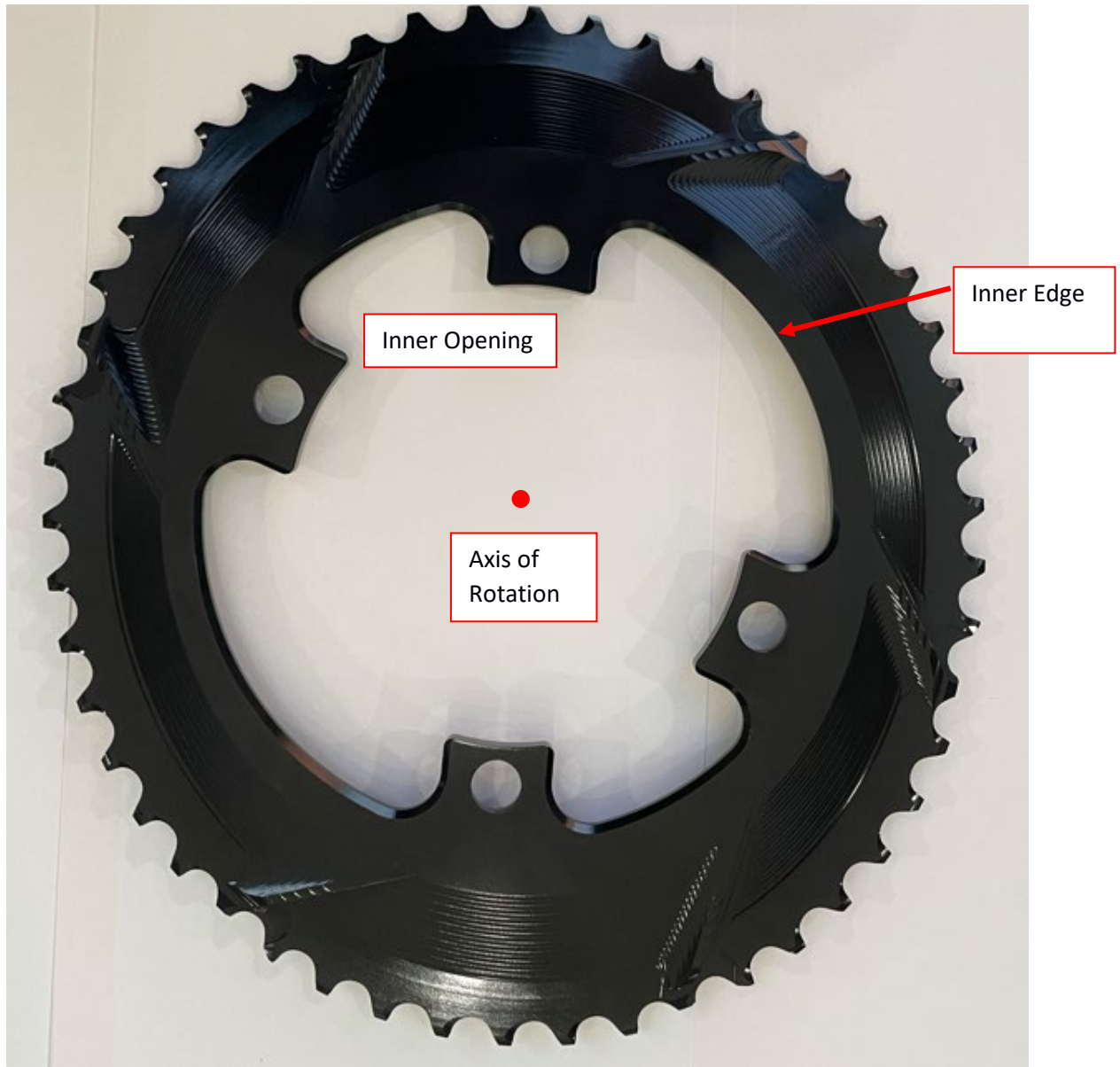
[https://www.jbi.bike/site/search\\_result.php?keywords=absoluteblack](https://www.jbi.bike/site/search_result.php?keywords=absoluteblack)



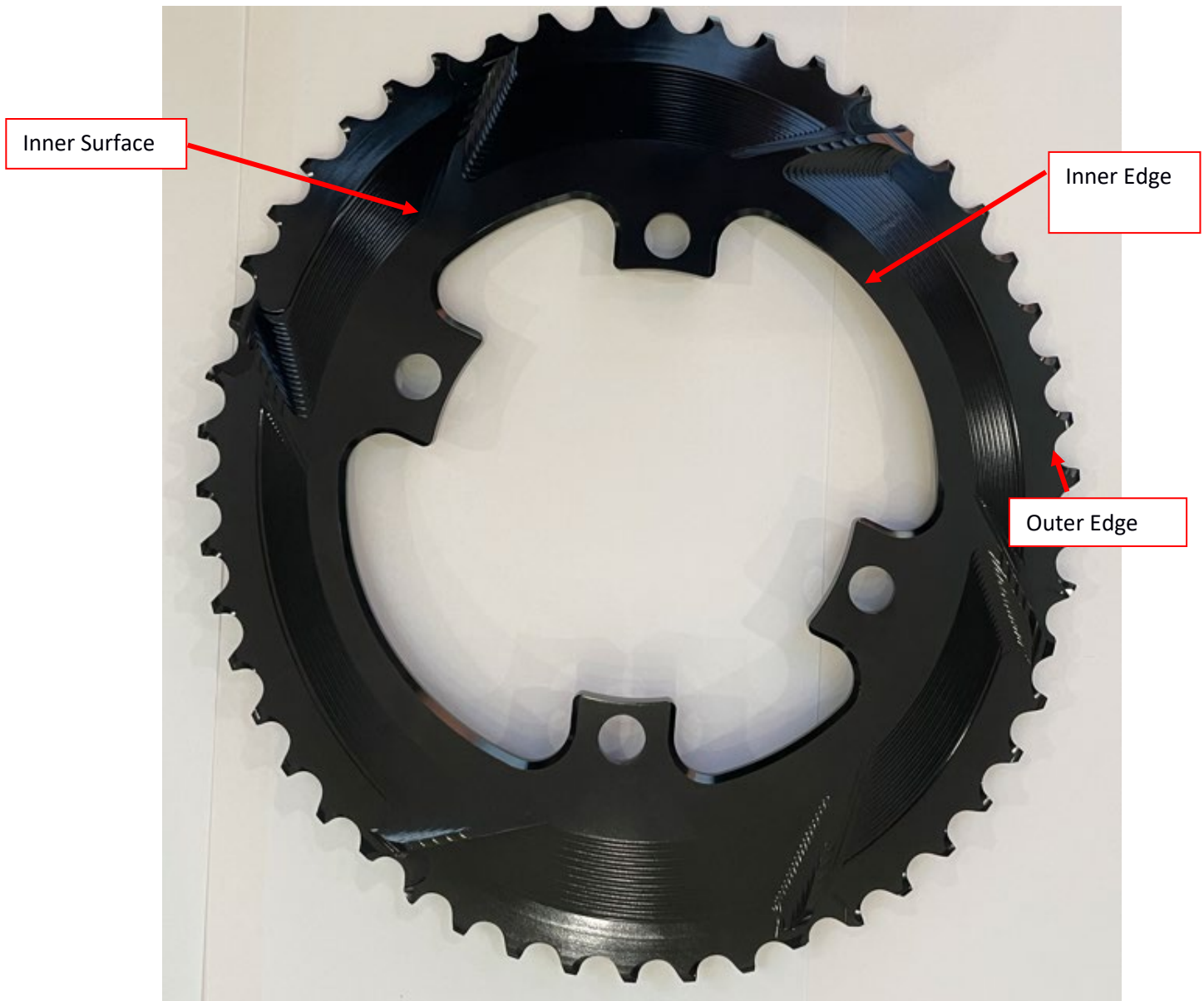
13. For example, claim 1 of the '338 Patent recites:

1. A bicycle chain ring, comprising  
an inner edge fully circumscribing both an opening and an  
axis of rotation;  
an inner surface extending between the inner edge and an  
outer edge where a plurality of chain ring teeth ema-  
nate; and  
a plurality of ramps disposed about the inner surface,  
wherein at least one of the plurality of ramps has a  
lifting surface configured to concurrently engage at  
least one link of a bicycle chain at two or more distinct  
pivot points along the length of the chain link to initiate  
stable lift of the bicycle chain without assistance from  
any of the plurality of chain ring teeth;  
wherein the lifting surface has a first end proximate the  
inner edge and a second end proximate the outer edge.

14. The absoluteBLACK bicycle chainrings imported, sold, offered for sale, distributed, and marketed by J & B comprise an inner edge fully circumscribing an opening and an axis of rotation.



15. The infringing bicycle chainrings comprise an inner surface extending between the inner edge and an outer edge where a plurality of chain ring teeth emanate.



16. The infringing chainrings feature a plurality of ramps disposed about an inner surface of the bicycle chain ring as shown in the example below:



17. absoluteBLACK refers to these structures as “ramps” in publications describing the chainrings.

18. These ramps improve up-shifting during normal operation of a bicycle having absoluteBLACK chainrings imported, sold, offered for sale, marketed, and distributed by J & B.

19. The photograph below shows the structure of the absoluteBLACK ramp:

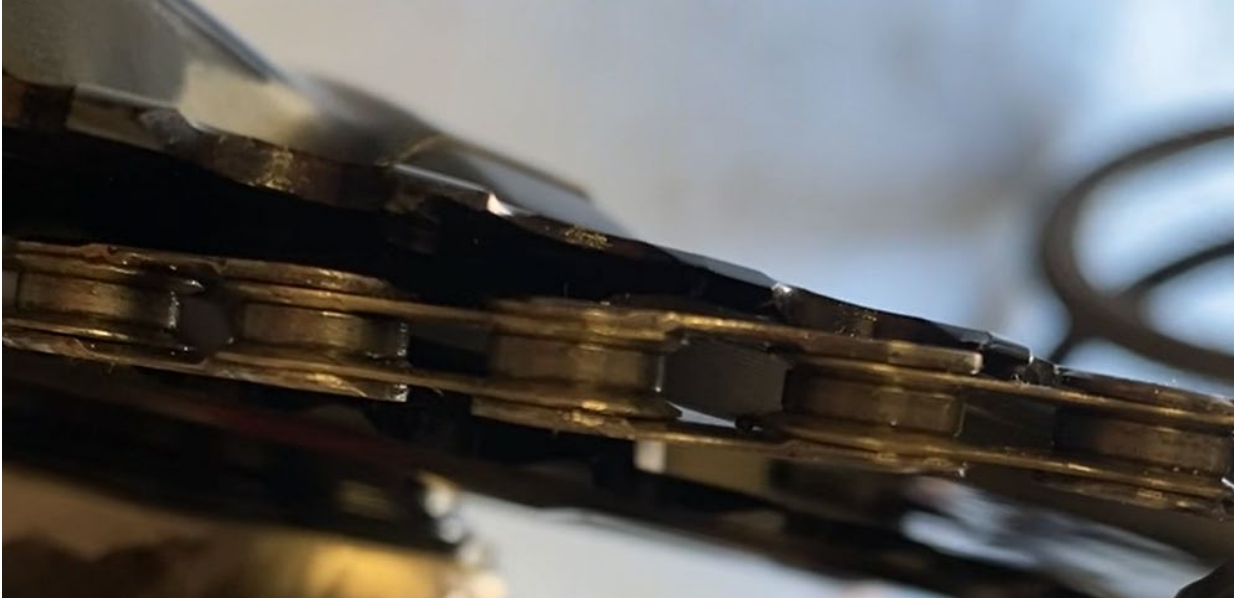




20. These ramps on the absoluteBLACK chainrings are configured with a lifting surface to concurrently engage at least one link of a bicycle chain at two or more distinct pivot points along the length of the chain link to initiate stable lift of the bicycle chain without assistance from any of the plurality of chain ring teeth as recited in the asserted patent claims.







21. The lifting surfaces of the absoluteBLACK chainring ramps have a first end proximate the inner edge and a second end proximate the outer edge.

22. J & B Importers, Inc. directly infringes the '338, '875, and '099 Patents owned by RampWerks.

23. As of the filing of this complaint, absoluteBLACK, which is based in the country of Slovenia, has not responded to the complaint for patent infringement filed against it by RampWerks in the United States District Court for the Eastern District of Texas. On information and belief, J & B performs in the United States the acts of infringement complained of in this complaint.

**COUNT 1 - INFRINGEMENT OF U.S. PATENT NO. 10,677,338**

24. RampWerks incorporates the preceding paragraphs herein by reference.

25. RampWerks, LLC is the owner, by assignment, of U.S. Patent No.10,677,338 titled "Bicycle Chain Rings."

26. The '338 Patent is valid and enforceable and was duly issued by the United

States Patent Office upon finding that it fully complied with Title 35 of the United States Code (<https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/10677338>).

27. J & B Importers, Inc. has no consent or authorization to practice the '338 Patent.

28. J & B Importers, Inc. directly infringes one or more claims of the '338 Patent, including at least claim 1 under 35 U.S.C. § 271(a) by making, using, offering for sale, importing, distributing, and/or selling the accused chainring products in the United States.

29. At least as of the service of this Complaint, J & B Importers, Inc. is on notice of the '338 Patent, the products that infringe the '338 Patent, and of how they infringe.

30. RampWerks has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff in an amount that adequately compensates it for Defendant's infringement, which compensation by law cannot be less than a reasonable royalty together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

## **COUNT 2 - INFRINGEMENT OF U.S. PATENT NO. 10,711,875**

31. RampWerks incorporates the preceding paragraphs herein by reference.

32. RampWerks, LLC is the owner, by assignment, of U.S. Patent No. 10,711,875 titled "Bicycle Chain Rings."

33. The '875 Patent is valid and enforceable and was duly issued by the United States Patent Office upon finding that it fully complied with Title 35 of the United States Code (<https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/10711875>).

34. J & B Importers, Inc. has no consent or authorization to practice the '875 Patent.

35. J & B Importers, Inc. directly infringes one or more claims of the '875 Patent, including at least claim 8 under 35 U.S.C. § 271(a) by making, using, offering for sale, importing, distributing, and/or selling the accused chainring products in the United States.

36. At least as of the service of this Complaint, J & B Importers, Inc. is on notice of the '875 Patent, the products that infringe the '875 Patent, and of how they infringe.

37. RampWerks has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff in an amount that adequately compensates it for Defendant's infringement, which compensation by law cannot be less than a reasonable royalty together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

### **COUNT 3 - INFRINGEMENT OF U.S. PATENT NO. 11,460,099**

38. RampWerks incorporates the preceding paragraphs herein by reference.

39. RampWerks, LLC is the owner, by assignment, of U.S. Patent No. 11,460,099 titled "Bicycle Chain Rings."

40. The '099 Patent is valid and enforceable and was duly issued by the United States Patent Office upon finding that it fully complied with Title 35 of the United States Code (<https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/11460099>).

41. J & B Importers, Inc. has no consent or authorization to practice the '099 Patent.

42. J & B Importers, Inc. directly infringes one or more claims of the '099 Patent, including at least claim 1 under 35 U.S.C. § 271(a) by making, using, offering for sale, importing, distributing, and/or selling the accused chainring products in the United States.

43. At least as of the service of this Complaint, J & B Importers, Inc. is on notice of the '099 Patent, the products that infringe the '099 Patent, and of how they infringe.

44. RampWerks has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff in an amount that adequately compensates it for Defendant's infringement, which compensation by law cannot be less than a reasonable royalty together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

#### **SECTION 287 NOTICE**

45. RampWerks complied with 35 U.S.C. § 287 by marking its products.

#### **NOTICE OF REQUIREMENT OF LITIGATION HOLD**

46. Defendant is hereby notified they are legally obligated to locate, preserve, and maintain all records, notes, drawings, documents, data, communications, materials, electronic recordings, audio/video/photographic recordings, and digital files, including edited and unedited or "raw" source material, and other information and tangible things that Defendant knows, or reasonably should know, may be relevant to actual or potential claims, counterclaims, defenses, and/or damages by any party or potential party in this lawsuit, whether created or residing in hard copy form or in the form of electronically stored information (hereafter collectively referred to as "Potential Evidence").

47. As used above, the phrase “electronically stored information” includes without limitation: computer files (and file fragments), e-mail (both sent and received, whether internally or externally), information concerning e-mail (including but not limited to logs of e-mail history and usage, header information, and deleted but recoverable e-mails), text files (including drafts, revisions, and active or deleted word processing documents), instant messages, audio recordings and files, video footage and files, audio files, photographic footage and files, spreadsheets, databases, calendars, telephone logs, contact manager information, internet usage files, and all other information created, received, or maintained on any and all electronic and/or digital forms, sources and media, including, without limitation, any and all hard disks, removable media, peripheral computer or electronic storage devices, laptop computers, mobile phones, personal data assistant devices, Blackberry devices, iPhones, video cameras and still cameras, and any and all other locations where electronic data is stored. These sources may also include any personal electronic, digital, and storage devices of any and all of Defendant’s agents, resellers, or employees if Defendant’s electronically stored information resides there.

48. Defendant is hereby further notified and forewarned that any alteration, destruction, negligent loss, or unavailability, by act or omission, of any Potential Evidence may result in damages or a legal presumption by the Court and/or jury that the Potential Evidence is not favorable to Defendant’s claims and/or defenses. To avoid such a result, Defendant’s preservation duties include, but are not limited to, the requirement that Defendant immediately notify their agents and employees to halt and/or supervise the auto-delete functions of Defendant’s electronic systems and refrain from deleting



Potential Evidence, either manually or through a policy of periodic deletion.

### **JURY DEMAND**

RampWerks hereby demands a trial by jury on all claims, issues and damages so triable.

### **PRAYER**

RampWerks prays for the following relief:

- i. That J & B Importers, Inc. be summoned to appear and answer;
- ii. That the Court enter an order declaring that J & B Importers, Inc. has infringed the '338, '875, and '099 Patents;
- iii. That this is an exceptional case under 35 U.S.C. § 285;
- iv. That the Court grant Plaintiff judgment against J & B Importers, Inc. for all actual, consequential, special, punitive, exemplary, increased, and/or statutory damages pursuant to 35 U.S.C. § 284 including, if necessary, an accounting of all damages; pre- and post-judgment interest as allowed by law; and reasonable attorneys' fees, costs, and expenses incurred in this action;
- v. That the Court enjoin J & B Importers, Inc. from further acts of infringement; and
- vi. Such further relief to which RampWerks may show itself justly entitled.

Filed: October 4, 2023

Respectfully submitted,

By: /s/ Jeffrey B. Shalek

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