

1 Randall Miller, Esq. (SBN 116036)
2 rmiller@millerlawapc.com
3 Zachary Mayer, Esq. (SBN 199434)
4 zachary@millerlawapc.com
5 **MILLER LAW ASSOCIATES, APC**
6 411 South Hewitt St.
7 Los Angeles, CA 90013
8 Phone: 213.493.6400
9 Fax: 888.748.5812

10 Joseph Farco (*Pro Hac Vice* to be filed)
11 jfarco@norris-law.com
12 **NORRIS McLAUGHLIN P.A.**
13 7 Times Square, 21st Floor
14 New York, NY 10036
15 Phone: 212.808.0700
16 Fax: 212.808.0844

17 Attorneys for Plaintiff LALTITUDE, LLC (d/b/a PicassoTiles)

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20	LALTITUDE, LLC (d/b/a PicassoTiles),) Case No. 2:24-cv-00351
21)
22	Plaintiffs,) COMPLAINT FOR DAMAGE
23) AND FOR DECLARATORY
24	vs.) JUDGMENT
25) 1. Declaratory Judgment of Non-
26	SHANTOU GAOWO SCIENCE &) Infringement of U.S. Design
27	EDUCATION TOYS CO., LTD.,) patent No. 1,007,603S (“D603
28	YONGQUN WANG, GOWOLTD INC., and) Patent”)
	DOE 1,) 2. Declaratory Judgment of
) Invalidity of D603 Patent
	Defendants.) 3. Declaratory Judgment of
) Unenforceability of D603 Patent
) 4. Patent Misuse
) 5. Unfair Competition
) DEMAND FOR JURY TRIAL
)
)

MILLER • LAW • ASSOCIATES
A PROFESSIONAL CORPORATION

1 Plaintiff LALTITUDE, LLC (d/b/a PicassoTiles) (collectively, “Plaintiff”) for
2 its Complaint for Declaratory Judgement of Patent Non-Infringement, Invalidity,
3 Unenforceability, and Patent Misuse against each of SHANTOU GAOWO SCIENCE
4 & EDUCATION TOYS CO., LTD. (“SGS”), YONGQUN WANG (“Wang”), and one
5 or more DOE companies (DOE 1) and GOWOLTD INC. (“GW”) related to the email
6 address marketing@gowoltd.com (collectively referred to herein as “Defendants”),
7 aver and allege as follows.

8 NATURE OF THE ACTION


9 1. Since at least 2019, Plaintiff manufactures, uses, offers for sale, and has
10 sold a toy race car for use with its magnet toy play sets sold under the brand
11 PicassoTiles. This toy race car has a bottom that functions to hold its wheels,
12 batteries, on/off switch, electric motor and gears, and track extensions that hold the car
13 in the grooves found on certain magnetic parts of Plaintiff’s magnet toy play sets.



19
20
21
22
23
24
25
26
27
28

PicassoTiles UNBOXING!! PTR30 Race Track 30 Piece Race Car Track Building Block Magnetic Toy Set
PicassoTiles 3.47K subscribers
12,563 views Jan 31, 2020 #Tiles #kidsplay #buildingblocks
PicassoTiles 30 Piece Race Car Track Building Block Educational Toy Set Magnetic Tiles Magnet DIY Project 2 Light up Car STEM Learning Coordination All Hand/Eye Coordination Fine Motor Skill Training Child Brain Development

PicassoTiles UNBOXING!! PTR30 Race Track

 **PicassoTiles**
3.47K subscribers

12,563 views Jan 31, 2020 #Tiles #kidsplay #buildingblocks
PicassoTiles 30 Piece Race Car Track Building Block Educational
Training Child Brain Development

1 [https://www.youtube.com/watch?v=vrOjyeSeo64&list=PLf9ncA15-](https://www.youtube.com/watch?v=vrOjyeSeo64&list=PLf9ncA15-CmifGQXfWNv7hvd2iIQR8ip&index=6)
2 [CmifGQXfWNv7hvd2iIQR8ip&index=6](https://www.youtube.com/watch?v=vrOjyeSeo64&list=PLf9ncA15-CmifGQXfWNv7hvd2iIQR8ip&index=6) (last visited January 3, 2024). Plaintiff
3 sells these toy race cars on Amazon as part of the following sets according to Amazon
4 Standard Identification Number (“ASIN”): B07N7PBXGF, B07V9XN4K1,
5 B087D93828, B07MWGZKCB, B07ZL3MVY9, B08HVPHDDQ (collectively
6 referred to herein as the “Accused Products”).

7 2. U.S. Patent Number D1,007,603S (the “D603 Patent”) was filed on
8 March 11, 2021. See **Exhibit A**.

9 3. Defendants SGS and Wang never cited the Accused Products
10 demonstrated on January 31, 2020 (or at any other time prior to March 11, 2021) to
11 the United States Patent and Trademark Office (“USPTO”). *Id.*

12 4. On December 16, 2023, one or more DOE companies and/or Defendant
13 GW, through the email address, marketing@gowoltd.com, informed Amazon that
14 Plaintiff’s toy race cars infringe the D603 Patent. Thereafter, Amazon removed each
15 of Plaintiff’s Accused Products containing the toy race cars from its website and
16 provided Plaintiff with the marketing@gowoltd.com email address to contact the
17 purported rights owner of the D603 Patent.

18 5. On December 22, 2023, Plaintiff responded to Amazon by stating the
19 D603 Patent cannot be infringed because it is invalid over the toy race cars, which are
20 prior art to the D603 Patent.

21 6. Neither of the Defendants nor Amazon have permitted Plaintiff to sell the
22 Accused Products in spite of Plaintiff’s December 22, 2023 communication regarding
23 D603 Patent invalidity.

24 7. On January 2, 2024, Plaintiff’s counsel wrote to the following email
25 addresses: contact@kafiling.com; filing@kafiling.com; marketing@gowoltd.com;
26 emil@mccabeali.com; runit.kanakia@kanalysis.com. Using Microsoft® Outlook
27 Delivery Notification, Plaintiff’s counsel received an email at 5:48 PM on January 2,
28 2024 stating, “[d]elivery to these recipients or groups is complete, but no delivery

1 notification was sent by the destination server: contact@kafiling.com
2 (contact@kafiling.com) filing@kafiling.com (filing@kafiling.com)
3 marketing@gowoltd.com (marketing@gowoltd.com) email@mccabeali.com
4 (email@mccabeali.com), rumit.kanakia@kanalysis.com
5 (rumit.kanakia@kanalysis.com) Subject: RE: Amazon Complaint ID: 14480949391”.
6 **See Exhibit B.**

7 8. On January 3, 2024 at 5:18 AM (EST), “Ashutosh” from KA Filing LLC
8 sent the following in an email to Plaintiff’s counsel:

9 Dear Joseph,

10 Thank you for your email.

11 Our responsibilities were solely limited to the prosecution of
12 this design patent. Any actions on the Amazon platform or
13 elsewhere are beyond our control.

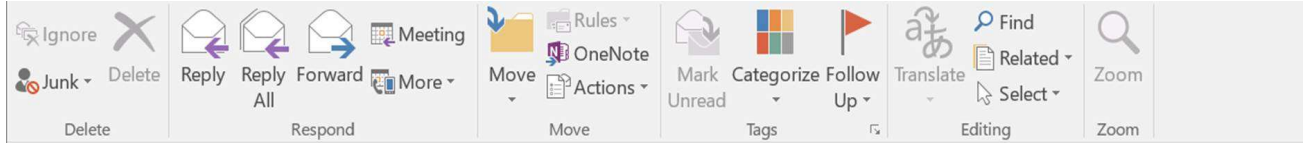
14 I have forwarded your email to our Chinese client, and they will
15 take any necessary actions in accordance with the client's
16 instructions.

17
18 Best Regards,

19 Ashutosh

20 **Exhibit C.**

21 9. At 8:08 AM on January 3, 2024, Plaintiff’s counsel requested
22 confirmation that “Ashutosh” at KA Filing LLC had in fact forwarded the message to
23 the yet un-named Chinese client. On January 4, 2024, Ashutosh at KA Filing LLC
24 stated, “Dear Joseph, I am afraid, I can’t share my client detail. But here is the
25 screenshot that I have shared the same with them.” Ashutosh at KA Filing LLC
26 provided the following screenshot indicating the same subject line as Plaintiff’s
27 counsel’s email, “Amazon Complaint ID: 14480949391”, was provided to a person
28 named “Jack”:



Wed 03-01-2024 15:48
contact@kafiling.com
FW: Amazon Complaint ID: 14480949391

To 'Jack'

This message was sent with High importance.



fyi

Best Regards,
Ashutosh

Exhibit D.

10. Though Plaintiff has unsuccessfully attempted to address Defendants’ meritless infringement accusations with Amazon and has tried to obtain a direct line of communication to one or more of the Defendants using the contact information provided by Amazon and Defendants’ patent prosecution attorneys, Defendants persist in their wrongful conduct of illegitimately using the D603 Patent to competitively harm Plaintiff. Consequently, Plaintiff now seeks relief from this Court to resolve this dispute and be compensated for the injury caused by each of the Defendants unlawful business practices, including inequitable conduct, antitrust, patent misuse, and unfair competition.

11. This is an action for declaratory judgement of non-infringement, invalidity, patent misuse, and unenforceability of the D603 Patent under the patent laws of the United States, to wit, 35 U.S.C §§ 101, 271, and 282, as well as findings of antitrust violations and unfair competition under California law. Plaintiff brings this action as a result of Defendants’ unlawful, fraudulent, and unfair business practices.

///

///

///

PARTIES

12. Plaintiff is now, and at all times relevant herein was, a California limited liability company, having a principal place of business in Hacienda Heights, California.

13. Based on the Application Data Sheet (“ADS”) filed for Defendants Wang and SGS, Plaintiff is informed and believes, and on that basis alleges, that Defendant Wang is, and at all times relevant herein was, an individual located in the People’s Republic of China with an address of No. 26, Lane 9, Pumelhu District, Guangyi Street, Chenghai District, Shantou, Guandaong, China 515800. *See Exhibit E.*

14. Based on the same ADS filed for Defendants Wang and SGS, Plaintiff is informed and believes, and on that basis alleges, that Defendant SGS is a Chinese business entity of form unknown, having a principal place of business at No. 26, Lane 9, Pumelhu District, Guangyi Street, Chenghai District, Shantou, Guandaong, China 515800. *Id.*

15. Based on the public-facing webpage on which appears the email address marketing@gowoltd.com provided by Amazon to Plaintiff, Plaintiff is informed and believes, and on that basis alleges, that Defendant GW is a Chinese business entity of form unknown, having a principal place of business in Chenghai District, Shantou City, GuangDong Province, China 515800.

16. Plaintiff avers that with additional jurisdictional discovery it can confirm the identity of all other DOE companies associated with marketing@gowoltd.com, besides Defendant GW.

JURISDICTION AND VENUE

17. This action arises under the patent laws of the United States, Title 35 of the United States Code §§ 101 et seq.

18. This action further arises under the antitrust laws of the United States, including but not limited to §1 of the Sherman Act (15 U.S.C. §1) and §§4, 26 of the Clayton Act (15 U.S.C. §§15, 26).

1 19. Plaintiff seeks relief under the Federal Declaratory Judgement Act.

2 20. Plaintiff has standing because Defendants filed in the past, and recently
3 re-filed, claims of patent infringement to Amazon which has resulted in the removal of
4 Plaintiff's Amazon product listings. Product delisting from Amazon has stopped
5 Plaintiff's Amazon sales and caused significant financial loss. Defendants' actions
6 thereby give rise to a case of actual controversy under 28 U.S.C. §§ 2201 et. seq.

7 21. This Court has subject matter jurisdiction over these claims pursuant to
8 28 U.S.C. §§ 1331, 1337, 1338, 2201 and 2202.

9 22. The Court also has supplemental jurisdiction pursuant to 28 U.S.C.
10 §1367 over Plaintiff's state law claims, including violation of the California Unfair
11 Competition Laws. California Business and Professions Code §17200.

12 23. This Court has both general and specific jurisdiction over GW, Y. Wang,
13 and SGS because each of GW, Y. Wang, and SGS has committed acts purposefully
14 directed at and whose affects would reasonably be felt by Plaintiff within this District
15 and give rise to this action. Thus, GW, Y. Wang, and SGS each has established
16 minimum contacts with this forum such that the exercise of jurisdiction over GW, Y.
17 Wang, and SGS would not offend traditional notions of fair play and substantial
18 justice.

19 24. GW, directly and/or through subsidiaries, intermediaries (including
20 distributors, retailers, franchisees and others), has committed and continues to commit
21 acts of patent misuse and antitrust in this District, by, among other things, using the
22 knowingly invalid D603 Patent to prevent Plaintiff's sales of its competitive Accused
23 Products. As a result, this Court has personal jurisdiction over GW.

24 25. SGS, directly and/or through subsidiaries, intermediaries (including
25 distributors, retailers, franchisees and others), has committed and continues to commit
26 acts of patent misuse and antitrust in this District, by, among other things, using the
27 knowingly invalid D603 Patent to prevent Plaintiff's sales of its competitive Accused
28 Products. As a result, this Court has personal jurisdiction over SGS.

1 26. Y. WANG, directly and/or through subsidiaries, intermediaries
2 (including distributors, retailers, franchisees and others), has committed and continues
3 to commit acts of patent misuse and antitrust in this District, by, among other things,
4 using the knowingly invalid D603 Patent to prevent Plaintiff's sales of its competitive
5 Accused Products. As a result, this Court has personal jurisdiction over Y. WANG.

6 27. Venue is proper as to each of GW, SGS, and Y. Wang under 28 U.S.C. §
7 1391(c)(3) in that none are residents of the United States and may, therefore, be sued
8 in any judicial district. *Brunette Mach. Works, Ltd. v. Kockum Indus., Inc.*, 406 U.S.
9 706, 714 (1972).

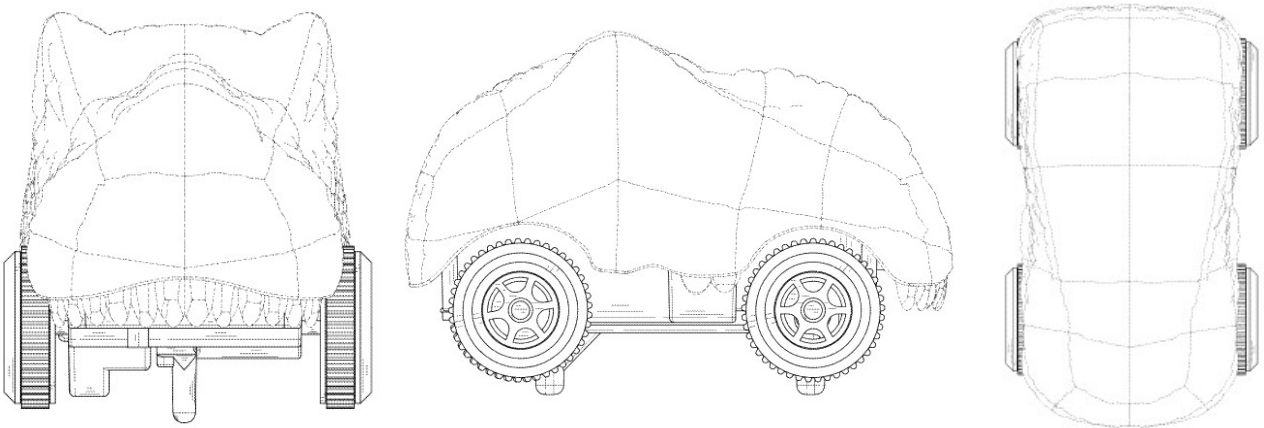
10 28. Plaintiff concurrently files herewith a motion to this Court authorizing
11 service of process on GW, SGS, and Y. WANG via alternative means under Fed. R.
12 Civ. P. 4(f).

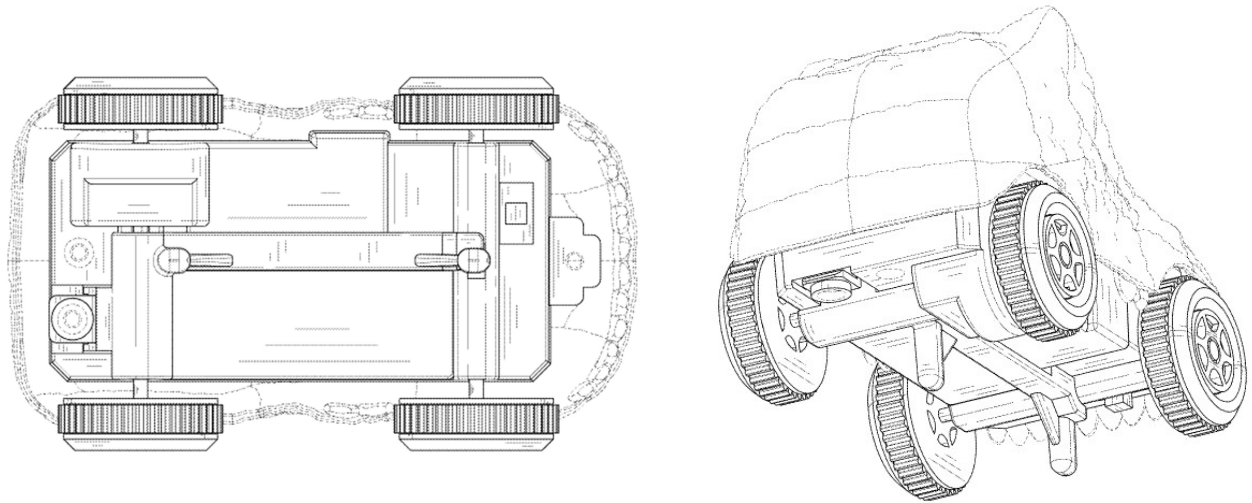
13 **COUNT I:**

14 **Declaratory Judgment Of Non-Infringement Of The D603 Patent**

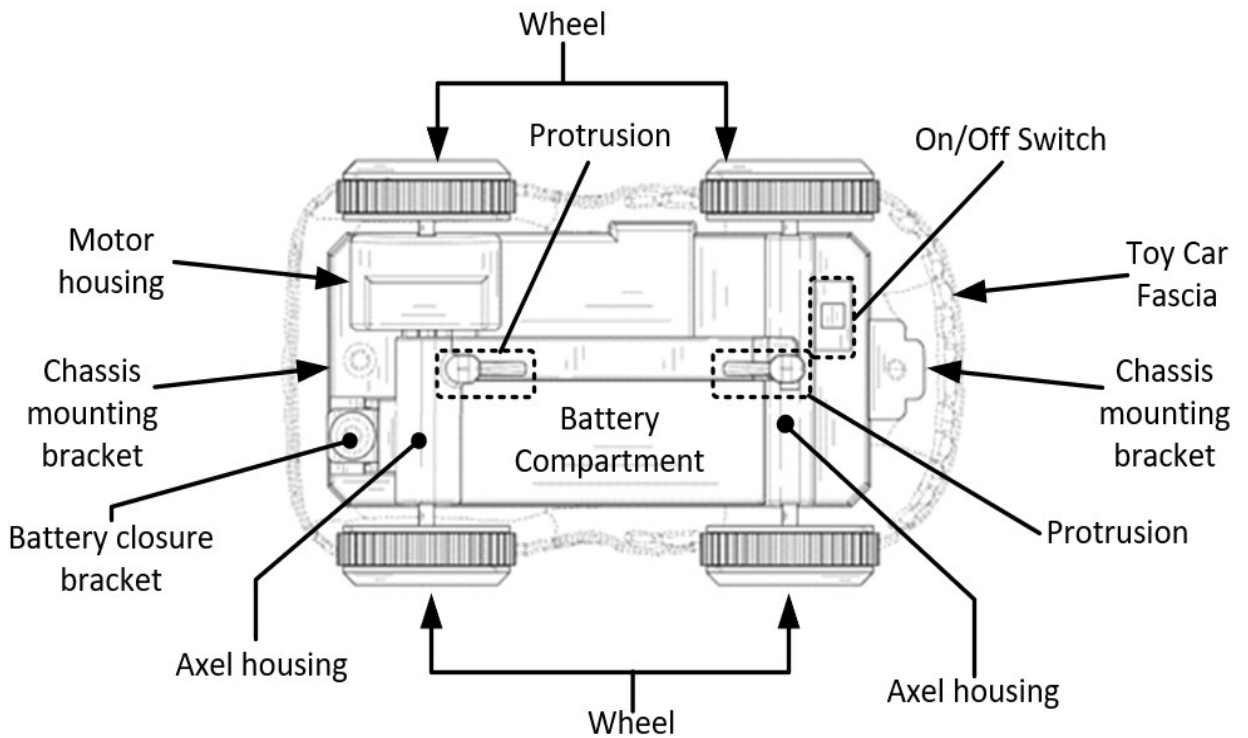
15 29. Plaintiff hereby incorporates by reference all of the foregoing paragraphs
16 as if fully set forth herein.

17 30. The D603 Patent contains one claim to the ornamental design for a toy
18 car as shown and described below:





31. The D603 Patent claims numerous features whose designs are dictated purely by function:



D603 Patent, Figure 6 (annotations supplied).

1 32. Prior art cited on the face of the D603 Patent also shows nearly all design
2 features identical to those claimed in the D603 Patent as noted above, with the
3 exception of the winged protrusions:



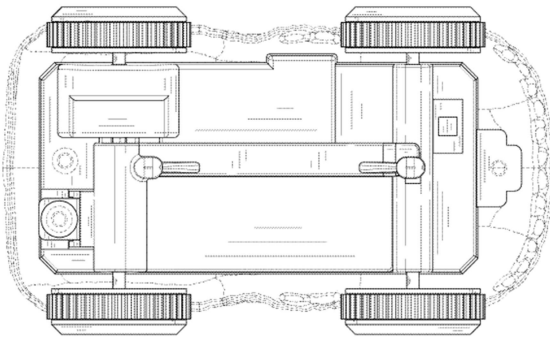
12 [https://www.amazon.com/Dinosaur-Replacement-Battery-Accessories-](https://www.amazon.com/Dinosaur-Replacement-Battery-Accessories-Compatible/dp/B09MVRDTJX?th=1)
13 [Compatible/dp/B09MVRDTJX?th=1](https://www.amazon.com/Dinosaur-Replacement-Battery-Accessories-Compatible/dp/B09MVRDTJX?th=1) (last visited Dec. 27, 2023).

14 33. As compared to any of the Accused Products, the D603 Patent is closer to
15 the prior art cited above. The prior art Accused Products have solid functional
16 protrusions just like the designs claimed. In contrast, the functional protrusions in the
17 Accused Products are hollow with reception points for screws/bolts and are not solid
18 protrusions with the winged features illustrated in the D603 Patent.

19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

D603 Patent




Prior Art



PicassoTiles UNBOXING!! PTR30 Race Track 30 Piece Race Car Track Building Block Magnetic Toy Set
PicassoTiles
12,563 views Jan 31, 2020 #Tiles #kidsplay #buildingblocks
PicassoTiles 30 Piece Race Car Track Building Block Educational Toy Set Magnetic Tiles Magnet DIY Playset 2 Light up Car STEM Learning Coordinate Grid Hand-Eye Coordination Fine Motor Skill Training Child Brain Development

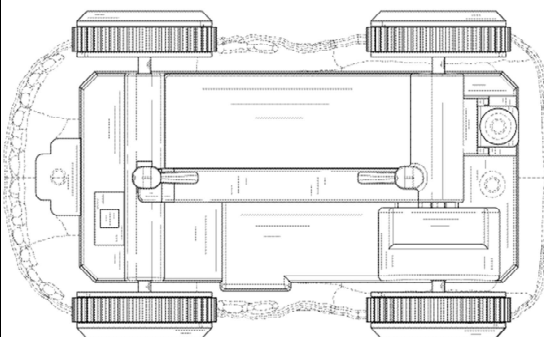
PicassoTiles UNBOXING!! PTR30 Race Track

 **PicassoTiles**
3.47K subscribers [Subscribe](#)

12,563 views Jan 31, 2020 #Tiles #kidsplay #buildingblocks
PicassoTiles 30 Piece Race Car Track Building Block Educational
Training Child Brain Development

D603 Patent

Accused Products



34. Therefore, an ordinary observer would find the Accused Products to be plainly dissimilar to the claim of the D603 Patent.

35. Plaintiff seeks a declaration that the D603 Patent is not infringed.

36. Defendants know or should reasonably have known that the Accused Products cannot infringe the D603 Patent.

COUNT II:

Declaratory Judgment Of Invalidity Of The D603 Patent

37. Plaintiff hereby incorporates by reference all of the foregoing paragraphs as if fully set forth herein.

38. The D603 Patent is invalid under the Patent Laws of the United States of America, 35 U.S.C. §1 et seq., including but not limited to §§ 102, 103, 112, and 171.

39. To the extent the Defendants admit that the Accused Products are within the scope of the D603 Patent, then Plaintiff’s prior art sale of the Accused Products with the solid protrusion anticipates and renders the D603 Patent invalid under 35 U.S.C. § 102(a).

40. The prior art sold and/or publicly showed and/or publicly used renders the D603 Patent invalid under 35 U.S.C. § 102(a) and/or obvious under 35 U.S.C. § 103 in view of the other prior art cited by the USPTO on the face of the D603 Patent.

41. The D603 Patent is invalid under 35 U.S.C. § 171 for claiming design features that are purely dictated by function and/or are more functional than

1 ornamental, such as, for example, an on/off switch, battery compartment holder,
2 grooved wheels, track slots, wheel axels, a motor compartment, and mounting frames
3 for the bottom of the toy car to attach to an upper fascia.

4 42. Plaintiff seeks a declaration that the D603 Patent is invalid.

5 43. Defendants know or should reasonably have known that the D603 Patent
6 is invalid.

7 **COUNT III:**

8 **Declaratory Judgment Of Unenforceability Of The D603 Patent**

9 44. Plaintiff hereby incorporates by reference all of the foregoing paragraphs
10 as if fully set forth herein.

11 45. Upon information and belief, at least Defendant Y. Wang and/or
12 Defendant SGS, by and through the attorneys at KA Filing LLC, including Mr. Runit
13 Kanakia and/or Mr. Jose Cherson Weissbrot, were aware of the prior art sales of
14 Accused Products made by Plaintiff prior to the filing of the D603 Patent.

15 46. Upon information and belief, Defendant's patent counsel were aware that
16 amazon.com was a website relied on by the USPTO to locate prior art and could have
17 searched the same prior to allowing the D603 Patent to issue.

18 47. Because Defendant Y. Wang, Defendant SGS, and/or Defendant GW
19 were able to search Amazon to locate alleged Accused Products, each of these
20 Defendants had the capability to locate the prior art sales of the Accused Products as
21 well.

22 48. The omission of the prior art sales of Accused Products from the
23 prosecution history of the D603 Patent was material because the existence of that prior
24 art sale proves the existence of a prior art embodiment of the claim of the D603
25 Patent.

26 49. Defendant Y. Wang, Defendant SGS, and/or Defendant GW breached
27 their duty to the USPTO and as a result committed inequitable conduct in connection
28 with the prosecution of the D603 Patent.

1 50. Plaintiff seeks a declaration that the D603 Patent is unenforceable due to
2 Defendants' and/or their agents, KA Filing LLC's, fraud on the USPTO in obtaining
3 the D603 Patent in spite of the known prior art offer for sale of the Accused Product.

4 **COUNT IV**

5 **Patent Misuse**

6 51. Plaintiff hereby incorporates by reference all of the foregoing paragraphs
7 as if fully set forth herein.

8 52. Defendant Y. Wang, Defendant SGS, and Defendant GW have each
9 misused its patent rights by threatening to prevent Plaintiff from selling the non-
10 infringing Accused Products on Amazon.com based upon the invalid and fraudulently
11 obtained D603 Patent.

12 53. Defendant Y. Wang, Defendant SGS, and Defendant GW has misused its
13 D603 Patent by threatening Amazon of patent infringement by Plaintiff, while
14 knowing that the D603 Patent is in reality not infringed, invalid, and/or unenforceable
15 due to fraud. Defendants' actions involving the D603 Patent to restrain Plaintiff's
16 freedom of competition using an illegitimate patent right constitutes a *per se* violation
17 of the antitrust laws.

18 54. Plaintiff's business has been and continues to be injured as a result of
19 Defendants' patent misuse. Each of the Defendants have made unlawful use of the
20 D603 Patent, either alone, or in concert with any other Defendant has diminished
21 Plaintiff's abilities to make sales of its non-infringing Accused Products. Amazon's
22 removal of Plaintiff's listings and the threat of possible deactivation of Plaintiff's
23 Amazon Seller Account have caused, and continue to cause, Plaintiff to lose
24 substantial sales and impose irreparable harm in terms of lost sales of the Accused
25 Products to competitors or consumer dissatisfaction with being unable to obtain the
26 Accused Products when they were available prior to Defendants' bad acts.

27 55. As a result of Defendants' willful misuse of the D603 Patent, Plaintiff is
28 entitled to recover threefold the damages it has sustained, and the cost of this lawsuit,

1 including a reasonable attorney's fee.

2 **COUNT V**

3 **Unfair Competition Under California Law**

4 56. Plaintiff hereby incorporates by reference all of the foregoing paragraphs
5 as if fully set forth herein.

6 57. The conduct of one or more of Defendant Y. Wang, Defendant SGS, and
7 Defendant GW amount to unfair competition under Section 17200 et. seq. of the
8 California Business & Professions Code, which prohibits any unlawful, unfair, or
9 fraudulent business act or practice.

10 58. Plaintiff's business has been and continues to be injured as a result of
11 Defendants' unlawful, unfair, and fraudulent conduct by requesting Amazon to
12 remove Plaintiff's listings of the Accused Products based on a knowingly invalid,
13 unenforceable, and non-infringed D603 Patent. Amazon's removal of Plaintiff's
14 listings and the threat of possible deactivation of Plaintiff's Amazon Seller Account
15 have caused, and continue to cause, Plaintiff to lose substantial sales and impose
16 irreparable harm in terms of lost sales of the Accused Products to competitors or
17 consumer dissatisfaction with being unable to obtain the Accused Products when they
18 were available prior to Defendants' bad acts.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff prays for judgment to be entered in its favor against
21 Defendants as follows:

- 22 A. A judgment that the Accused Products do not infringe the D603 Patent;
23 B. A judgment that the D603 Patent is invalid;
24 C. A judgment that the D603 Patent is unenforceable due to the omission of
25 available prior art by Defendants and/or their agents KA Filing LLC;
26 D. A judgment that Defendant Y. Wang has engaged in patent misuse by
27 causing Amazon to remove the Accused Products on the basis of a non-
28 infringed, invalid, and/or unenforceable D603 Patent;

- 1 E. A judgment that Defendant SGS has engaged in patent misuse by causing
- 2 Amazon to remove the Accused Products on the basis of a non-infringed,
- 3 invalid, and/or unenforceable D603 Patent;
- 4 F. A judgment that Defendant GW has engaged in patent misuse by causing
- 5 Amazon to remove the Accused Products on the basis of a non-infringed,
- 6 invalid, and/or unenforceable D603 Patent;
- 7 G. A judgment permanently enjoining and restraining Defendants, their
- 8 officers, agents, servants, employees, and attorneys, and all other persons
- 9 acting in concert, participation or privity with them, and their successors
- 10 and assigns, from alleging, suggesting, or causing the Accused Products
- 11 to be delisted from Amazon on the basis of infringement of the D603
- 12 Patent;
- 13 H. A judgement requiring Defendants or their agents to retract or withdraw
- 14 the complaint to Amazon that has caused the removal of Plaintiff's
- 15 Accused Products;
- 16 I. A judgment declaring this case is exceptional in favor of Plaintiff
- 17 entitling Plaintiff to an award of reasonable attorney fees and the costs
- 18 incurred in prosecuting this action, together with interest, pursuant to 35
- 19 U.S.C. § 285;
- 20 J. A judgement be entered declaring the Defendants to have engaged in
- 21 antitrust activity, including patent misuse, and award threefold the
- 22 damages Plaintiff has sustained, plus the cost of this lawsuit, including a
- 23 reasonable attorney's fee;
- 24 K. That judgement be entered declaring that Defendants violated the unfair
- 25 competition laws of California and enter appropriate permanent
- 26 injunctions; and

27 ///

28 ///

1 L. A judgment awarding Plaintiff such other and further relief as the Court
2 may deem just and proper.

3
4 Dated: January 10, 2024 **MILLER LAW ASSOCIATES, APC**

5
6 By: /s/ Randall A. Miller
7 Randall A. Miller, Esq.
8 Zachary Mayer, Esq.
9 Attorneys for Plaintiff
LALTITUDE LLC (d/b/a PICASSOTILES)

10 Dated: January 12, 2024 **NORRIS McLAUGHLIN P.A.**

11
12 By: /s/ Joseph A. Farco
13 Joseph Farco, Esq.
14 Attorneys for Plaintiff
LALTITUDE LLC (d/b/a PICASSOTILES)

MILLER • LAW • ASSOCIATES
A PROFESSIONAL CORPORATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28