

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Inventive, LLC,)	
)	
Plaintiff,)	
)	Case No. _____
v.)	
)	
Lift and Tow, LLC,)	
Lift & Tow Industries LLC, and)	
Hidden Lift & Tow LLC,)	
)	Jury Demand
Defendants.)	

COMPLAINT

Plaintiff Inventive, LLC (“Inventive”), complains of Defendants Lift and Tow, LLC, Lift & Tow Industries LLC, and Hidden Lift & Tow LLC as follows:

1. These are claims for patent infringement, arising under the patent laws of the United States, specifically Title 35 of the United States Code, 35 U.S.C. § 271, for infringement of a registered trademark in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114(1)(a), for false advertising, in violation of Section 32 of the Lanham Act, 15 U.S.C. §§ 1114(1)(a), 1125(a)(1) and 1125(a)(1)(B), and for false designation of origin, in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1125(a)(1).

The Parties

2. Plaintiff Inventive, LLC, is a limited liability company formed under the laws of Idaho with its principal address at 3190 Industrial Way, Mountain Home, Idaho 83647-3902.

3. Defendants Lift and Tow, LLC (17685 Cumberland Hwy, Newburg, Pennsylvania 17240), Lift & Tow Industries LLC (3408 Orrstown Rd., Orrstown, Pennsylvania 17244), and Hidden Lift & Tow LLC (3408 Orrstown Rd., Orrstown, Pennsylvania 17244) are all active entities formed under the laws of the state of Pennsylvania (Ex. 1, PA Business records) (collectively, “Lift and

Tow”; Lift and Tow’s website (<https://liftandtow.com/contact/>) lists an additional business address of 10680 B Cumberland Highway, Orrstown, Pennsylvania 17244 (Ex. 2)). According to Pennsylvania business records, Mr. Eugene Hurst is the corporate “organizer” for Hidden Lift & Tow LLC and Lift & Tow Industries LLC (Ex. 1). According to Mr. Hurst, Hidden Lift & Tow LLC, purchased Lift and Tow, LLC on August 26, 2016 (Ex. 3).

Jurisdiction

4. This Court has subject matter jurisdiction over Counts I-IV of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a), as this is a civil action for patent infringement arising under 35 U.S.C. § 271, for trademark infringement arising under Section 32 of the Lanham Act, 15 U.S.C. § 1114(1)(a), for false advertising arising under Section 32 of the Lanham Act, 15 U.S.C. §§ 1114(1)(a), 1125(a)(1) and 1125(a)(1)(B), and for false designation of origin, in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1125(a)(1).

5. This Court has personal jurisdiction over Lift and Tow, as Lift and Tow has been engaged in patent infringement, trademark infringement, false advertising and false designation of origin, and continues to be engaged in patent infringement, false advertising and false designation of origin, that is directed at and causes or has caused damage to Inventive, an entity that is residing in, located in, or doing business throughout the United States, including Pennsylvania. Lift and Tow also regularly conducts business within the Middle District of Pennsylvania, specifically the Harrisburg Courthouse Division. (Defendants are located in Franklin and Cumberland Counties, Pennsylvania (Exs. 1-2)).

6. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(a)-(c), primarily because

the Middle District of Pennsylvania is where Lift and Tow resides for venue purposes, and a substantial part of the events or omissions giving rise to the claims occurred, or a substantial part of property that is the subject of the action is situated.

Background Regarding Inventive’s Valuable Towing Dolly Intellectual Property

7. Inventive is a designer, manufacturer and seller of many towing industry products, including Inventive’s patented vehicle recovery dollies (Inventive’s In The Ditch® SPEED® Dollies, *see* ¶8, *infra*). Inventive is the owner of the valid and enforceable Towing Dolly Cradle Assembly Patent (Ex. 4, U.S. Patent No. 7,275,753, Ceccarelli, et al., the “‘753 Patent”), and Inventive’s In The Ditch® SPEED® Dollies practice at least Claim 1 of the ‘753 Patent (Ex. 5, patent marking; Ex. 7, Ceccarelli Dec., at ¶1). Since 2016, Lift and Tow, a direct competitor to Inventive, has had no right or license to manufacture, advertise, offer for sale, sell and/or use Inventive’s In The Ditch® SPEED® Dollies and/or any dollies covered by the claim(s) of the ‘753 Patent.¹

8. Inventive is also the owner of its registered SPEED® mark (Ex. 6, Reg. No. 33/672,84, Supplemental Register), as well as a pending Principal Register application for SPEED® (*id.*, Serial No. 98/044,029). Since 2006, Inventive has continuously used its valuable SPEED® mark to advertise and identify its well-known In The Ditch® SPEED® dolly products to consumers in the towing industry, through print, online and in-person trade show advertising (*e.g., id.*, at pgs. 9-10, Inventive’s In The Ditch® SPEED® Dolly advertising; Ex. 7, at ¶5). The SPEED® mark is well known in the towing industry, as Inventive is the top seller of dolly products in the United States (Ex. 7, at ¶5). Over the past five years, Inventive spends a minimum of \$5,000.00 a month

¹ Lift & Tow LLC (currently owned by at least Hidden Lift and Tow LLC) was terminated as an Inventive In The Ditch® dealer in 2016 (Ex. 7, at ¶2; Ex. 3, Mr. Hurst December 15, 2023 email), and is not authorized to use or sell any Inventive products, including the In The Ditch® SPEED® Dollies.

(at least \$60,000.00 annually) on dolly advertising that features the SPEED® mark -- making infringement of this valuable mark, and any resulting consumer confusion, highly damaging to Inventive (*id.*, at ¶¶5, 7). Since 2016 (*see* fn. 1, *supra*), Lift and Tow has had no right or license to use Inventive's SPEED® mark (Ex. 7, at ¶2).

**Lift and Tow's Willful Infringement of Inventive's
Towing Dolly Intellectual Property**

9. Inventive learned at the November 15-18, 2023, American Towman Exposition (Ex. 8, <https://atexposition.com/>, Baltimore, MD, the "AT Show") that Lift and Tow is infringing at least Claim 1 of the '753 Patent (Ex. 4), as well as Inventive's SPEED® mark (Ex. 6) (collectively, the "Inventive Dolly IP"). Pictures taken by Inventive at the AT Show, where Inventive and Lift and Tow advertised their dolly products to a common pool of towing industry customers, show Lift and Tow's dolly product (Ex. 9, the "Accused Dolly(ies)"; Ex. 7, at ¶3). Examination of these pictures confirm the Accused Dolly is a virtual copy of every aspect of Inventive's In The Ditch® SPEED® Dolly (Ex. 7, at ¶3). (As explained above (¶7, *supra*), the In The Ditch® SPEED® Dollies practice at least Claim 1 of the '753 Patent). In fact, Lift and Tow's copying is so copious that Inventive's own salespeople who viewed the Accused Dollies at the AT Show thought that Lift and Tow was advertising Inventive's In The Ditch® SPEED® Dolly. Ex. 7, at ¶3.

10. At the time of the AT Show, Inventive first learned that Lift and Tow was also impermissibly using an identical, infringing SPEED trademark to identify and advertise its Accused Dollies to pass Lift and Tow's dollies off as Inventive products (Ex. 7, at ¶4). Lift and Tow impermissibly used its infringing SPEED mark through its online advertising of the Accused Dollies aimed at Inventive and Lift and Tow's common pool of towing consumers (Ex. 10, Lift and Tow's website, www.liftandtow.com; Ex. 7, at ¶4), to sow further consumer confusion in the towing industry marketplace. Notably, Lift and Tow has no registered trademark for SPEED,

and/or any similar mark using the word SPEED, for any products. As explained below (*see* ¶11, *infra*), Lift and Tow appears to have ceased its infringement of the SPEED® mark after receiving a December 1, 2023 (Ex. 11), cease and desist letter from Inventive, but Lift and Tow’s infringement of SPEED® occurred in 2017 through the end of 2023 (Ex. 7, at ¶4, citing waybackmachine internet archive results for Lift and Tow’s website). Even if Lift and Tow’s infringement has stopped, it has likely caused damaging consumer confusion to Inventive, such that a consumer may reasonably infer a connection between the Lift and Tow and Inventive, which does not exist – resulting in potential damage, eroded consumer goodwill, and lost sales and profits to Inventive. *Id.*, at ¶¶5, 7.

11. Lift and Tow’s infringement of Inventive’s Dolly IP is willful and in bad faith for at least a few reasons. *First*, promptly after the AT Show, Inventive sent Lift and Tow a December 1, 2023 letter (Ex. 11) requesting that Lift and Tow immediately cease its infringement of the Inventive Dolly IP. Lift and Tow continues to advertise and sell its Accused Dollies which infringe the ‘753 Patent, on its website (Ex. 12, February 8, 2024, snapshot of www.liftandtow.com). Inventive correspondence with Mr. Hurst also shows these ongoing sales. *See* Ex. 3, Mr. Hurst December 15, 2023, email stating, “[a]s for the sales of our dolly product not being an infringement of Incentives ‘In The Ditch’ product we are NOT obliged to release the sales of OUR dolly design.” After Mr. Hurst’s email (*id.*), and despite a follow up letter on December 19, 2023 (Ex. 13), again, requesting that Lift and Tow cease infringement of the ‘753 Patent, Lift and Tow again failed to agree to do so. *Second*, Inventive’s In The Ditch® SPEED® Dollies are a leading product in the towing marketplace, and Lift and Tow LLC (now apparently owned by at least Hidden Lift and Tow LLC (Ex. 3)) was previously an In The Ditch® SPEED® Dollies dealer (terminated in 2016).²

² Lift and Tow’s argument that infringement here is not willful simply because Lift and Tow, LLC, a former In The Ditch® dealer, allegedly sold its business to new owners in 2016 (Ex. 3), is

Ex. 7, at ¶¶2, 5. Lift and Tow clearly knows, or reasonably should know, that Inventive owns the Inventive Dolly IP. Lift and Tow’s ongoing patent infringement, coupled with its unwillingness to substantively discuss resolution of this matter with Inventive shows Lift and Tow’s willful infringement and bad faith, and has resulted in unnecessary legal expenses for Inventive. *Id.*, at ¶7.

Lift and Tow’s Damaging and Confusing False Advertising

12. MADE IN THE USA advertising can only be used if *not only* final assembly occurs in the USA, *but also* all significant processing that goes into the product occurs in the USA, *and* all or virtually all components of the product are made and sourced in the USA. *See* 16 C.F.R. § 323.2. Lift and Tow’s website (<https://liftandtow.com/>) uses the advertising phrases “Lift & Tow™ | Made In USA | The Hidden Tow System” as a general website “banner” for all of its towing products, including the Accused Dollies, as well as “Lift and Tow Dolly Sets are made in the U.S.A.” and “Made with durable, heavy-duty materials right here in the U.S.A.” to advertise the Accused Dollies and related towing equipment (Ex. 14, *see* arrows). Lift and Tow’s Made In USA advertising falsely gives the impression to towing consumers that Lift and Tow’s final assembly of its Accused Dollies occurs in the United States, that all significant processing that goes into the Accused Dollies occurs in the United States, and that all or virtually all components of the product are made and sourced in the United States.

13. Given Inventive’s knowledge of the dolly market, including the manufacture of dolly products, Inventive has a good-faith basis to believe that significant components of Lift and Tow’s Accused Dollies, including but not limited to the dolly wheel, tire and hub, are foreign components, not sourced in the United States, making Lift and Tow’s MADE IN THE USA advertising false.

meritless.

Mr. Hurst confirms Inventive's good faith belief when he admits that at least the *tires and the wheels* – clearly important components for the Accused Dollies -- are foreign (Ex. 3).

14. Lift and Tow is also deceptively and in bad faith using images of Inventive's In The Ditch® SPEED® Dollies on Lift and Tow's website (Ex. 7, at ¶6) to give towing consumers the false impression that Lift and Tow is selling Inventive's In The Ditch® SPEED® Dollies. However, this is not the case, so if a consumer buys what they think is an authentic In The Ditch® SPEED® Dolly from Lift and Tow, they would actually receiving a knock-off Accused Dolly (*id.*). Using Inventive's images of its own dollies is clearly a false "bait and switch" advertising tactic to pass any purchased Accused Dollies off as the well-known Inventive In The Ditch® SPEED® Dollies (*id.*). This results in further consumer confusion and lost dolly sales and profits to Inventive.

Lift and Tow's Willful Infringement And False Advertising Damages Inventive

15. Inventive's SPEED® mark is well known in the towing industry to be associated with Inventive's In The Ditch® SPEED® Dolly. Lift and Tow's infringement of the SPEED® mark, coupled with their infringement of the '753 Patent, is a clear, willful and bad faith attempt to pass the Accused Dollies off as Inventive's In The Ditch® SPEED® Dollies. Due to this copying, Inventive is also encountering consumer confusion with warranty claims, where a claim is made to Inventive on a Lift and Tow Accused Dolly (Ex. 7, at ¶7).³ Lift and Tow's willful infringement has caused actual consumer confusion (*id.*, at ¶¶3, 7), such that consumers reasonably infer a connection between Lift and Tow and Inventive, which does not exist, resulting in erosion to Inventive's built-up consumer good will, and lost dolly sales and profits for Inventive. Regarding Lift and Tow's MADE IN USA claim as to its Accused Dollies, and its "bait and switch" use of

³ There is also substantial risk that in a potential or actual products liability case involving the Accused Dollies, these dollies are misidentified as Inventive In The Ditch® SPEED® Dollies, unfairly exposing Inventive to the risk of litigation. Ex. 7, at ¶7.

Inventive's dolly images to lure dolly customers, this false advertising has deceived, and/or has the capacity to deceive, dolly customers, and is likely to unfairly influence consumer's purchasing decisions – again, resulting in lost customers, sales and profits to Inventive. Unfortunately, it seems clear that Lift and Tow is going to continue its conduct, which is likely to cause irreparable harm to Inventive, unless enjoined by this Court.

COUNT I
Patent Infringement
(under 35 U.S.C. § 271)

16. Inventive incorporates by reference Pars. 1-15, above, to show that Lift and Tow has infringed the '753 Patent (Ex. 4).

17. Inventive is the owner of the '753 patent, which is an unexpired, valid and enforceable utility patent, that generally discloses and claims a towing and vehicle recovery dolly.

18. Through Lift and Tow's manufacture, marketing, distribution and sale of the Accused Dollies (Ex. 9) throughout the United States, Lift and Tow has willfully and impermissibly infringed at least independent Claim 1 of the '753 Patent. Further, Lift and Tow has been aware of the '753 Patent since at least December 1, 2023 (Ex. 11, Inventive's first cease and desist), and likely much earlier given that Lift and Tow LLC was an In The Ditch® SPEED® Dollies dealer until 2016. (Inventive's In The Ditch® SPEED® Dollies practice at least Claim 1 of the '753 Patent). Inventive's In The Ditch® SPEED® Dollies are also a very prominent product in the towing marketplace, such that Lift and Tow (a direct competitor to Inventive) should know about the '753 Patent. Despite this knowledge, Lift and Tow's willful patent infringement persists.

19. For these reasons, Lift and Tow's infringement has been willful and treble damages and attorney fees should be awarded pursuant to 35 U.S.C. §§ 284, 285. As Inventive and Lift and Tow are in direct competition in the towing dolly marketplace, Inventive requests damages in the form

of lost profits. At a minimum, Inventive is entitled to damages in the amount of a reasonable royalty, pursuant to 35 U.S.C. § 284.

20. Additionally, Lift and Tow's infringement has, and will continue to, irreparably injure Inventive, unless Lift and Tow's infringement is immediately and permanently enjoined by this Court.

COUNT II
Lanham Act Registered Trademark Infringement
(under 15 U.S.C. § 1114(1)(a) of Inventive's SPEED® Mark)

21. Inventive incorporates by reference Pars. 1-20, above.

22. Inventive is the owner of the valid and enforceable registered SPEED® mark (Ex. 6), as well as a pending Principal Register application for SPEED® (*id.*). Since June 2006, Inventive has used this mark to advertise and identify its towing and vehicle recovery In The Ditch® SPEED® Dollies to consumers in the towing industry.

23. Despite the fact that Lift and Tow is not authorized to use the SPEED® mark, or any confusingly similar mark, Lift and Tow has willfully infringed the SPEED® mark to advertise and identify Lift and Tow's Accused Dollies. This infringement is particularly damaging because the identical infringing SPEED mark is used in connection with identical goods as Inventive's SPEED® mark -- towing and vehicle recovery dollies -- to common towing customers in overlapping territories throughout the United States.

24. Lift and Tow knew, or should have known, that its impermissible use of an identical mark would likely cause confusion, mistake and/or deception as to the affiliation, connection or association of Lift and Tow's dolly products with those of Inventive.

25. As a result of Lift and Tow's trademark infringement, Inventive has suffered, and will

continue to suffer, damage in an amount to be proven at trial, and irreparable harm for which Inventive has no adequate remedy at law.

26. The intentional nature of this trademark infringement renders this an exceptional case under 15 U.S.C. § 1117(a).

COUNT III
False Advertising
(under 15 U.S.C. §§ 1114(1)(a), 1125(a)(1) and 1125(a)(1)(B))

27. Inventive incorporates by reference Pars. 1-26, above.

28. Lift and Tow has made at least the following false or misleading statements of facts in commercial advertising for its Accused Dollies and related towing products, namely: 1) “Lift & Tow™ | Made In USA | The Hidden Tow System” used as a general website “banner” for all of its towing products, including the Accused Dollies; 2) “Lift and Tow Dolly Sets are made in the U.S.A.”; and 3) “Made with durable, heavy-duty materials right here in the U.S.A.” (Ex. 14, *see* arrows).

29. Lift and Tow’s Made In USA advertising improperly gives the impression to towing consumers that Lift and Tow’s final assembly of its Accused Dollies occurs in the United States, that all significant processing that goes into the Accused Dollies occurs in the United States, and that all or virtually all components of the product are made and sourced in the United States. *See* 16 C.F.R. § 323.2. In fact, Mr. Hurst confirms Inventive’s good faith belief that this advertising is false when he admits that at least the *tires and the wheels* – clearly important components for the Accused Dollies -- are foreign (Ex. 3).

30. Lift and Tow has also deceptively and in bad faith used images of Inventive’s In The Ditch® SPEED® Dollies on Lift and Tow’s website to falsely give the impression to towing consumers that they are purchasing an Inventive In The Ditch® SPEED® Dolly. Ex. 7, ¶6.

However, this is not the case, and any consumer is actually receiving a knock-off Accused Dolly (*id.*). Using Inventive's images of its own dollies is clearly a false "bait and switch" advertising tactic to pass any purchased Accused Dollies off as the well-known Inventive In The Ditch® SPEED® Dollies. *Id.*

31. Lift and Tow's false statements and "bait and switch" tactics have deceived, or have the potential to deceive, a substantial segment of towing consumers, and is clearly aimed at achieving dolly sales over Inventive's competing dolly product. Lift and Tow's false advertising is material in that it is likely to unfairly influence consumer's purchasing decisions, resulting in lost dolly customers, sales and profits to Inventive.

32. Lift and Tow has made these false statements in interstate commerce, as it has made the statements in connection with the advertising, marketing, promoting, offering for sale, and sale of its Accused Dollies, which are advertised and sold throughout the United States, including Idaho.

33. Lift and Tow's willful false statements have injured or are likely to injure Inventive, a direct competitor to Lift and Tow. Inventive is entitled to, among other relief, injunctive relief and an award of actual damages, Lift and Tow's profits, enhanced damages and profits, and reasonable attorney fees, and costs.

COUNT IV
False Designation Of Origin
(under Section 32 of the Lanham Act, 15 U.S.C. § 1125(a)(1))

34. Inventive incorporates by reference Pars. 1-33, above.

35. Inventive is the owner of the valid and enforceable trademark SPEED® (Ex. 6). Since 2006, Inventive has used this mark to advertise and identify its towing and vehicle recovery dolly products to consumers in the towing industry throughout the United States.

36. Despite the fact that Lift and Tow is not authorized to use this mark, and/or any confusingly

similar mark, Lift and Tow has willfully infringed the SPEED® mark to advertise its identical types of goods -- towing and vehicle recovery dollies – to common towing customers in overlapping territories throughout the United States.

37. Lift and Tow’s infringement of Inventive’s well-known SPEED® mark has caused confusion in the marketplace, and is a false designation of origin such that a consumer would reasonably but incorrectly infer that an Accused Dolly originates from Inventive.

38. Lift and Tow knew, or should have known, that its impermissible use of an identical SPEED mark would likely cause confusion, mistake and/or deception as to the affiliation, connection or association of Lift and Tow’s dolly products with those of Inventive.

39. Lift and Tow has also engaged in “bait and switch” advertising that used images of Inventive’s In The Ditch® SPEED® Dollies on its website to falsely give the impression to towing consumers that they are purchasing an Inventive In The Ditch® SPEED® Dolly. However, if the consumer makes the purchase from Lift and Tow, they would actually receive a knock-off Accused Dolly. Using Inventive’s images of its own dollies is clearly a false “bait and switch” advertising tactic to pass off the Accused Dollies as originating from Inventive and being the well-known Inventive In The Ditch® SPEED® Dollies. *See* Ex. 7, ¶6.

40. As a result of Lift and Tow’s false designation of origin, Inventive has suffered, and will continue to suffer, damage in an amount to be proven at trial, and irreparable harm for which Inventive has no adequate remedy at law.

41. The intentional nature of this false designation of origin renders this an exceptional case under 15 U.S.C. § 1117(a).

PRAYER FOR RELIEF

WHEREFORE, Inventive requests that the Court enter judgment against Lift and Tow, as

well as its subsidiaries, agents, servants, employees, attorneys and all persons in active concert or participation with it, and grant Inventive the following relief:

A. An award to Inventive of such damages pursuant to 35 U.S.C. § 284 that are adequate to compensate it for Lift and Tow's patent infringement, in an amount equal to Inventive's lost profits, but in no event less than a reasonable royalty;

B. An award of prejudgment interest from the date infringement began of the '753 Patent;

C. A permanent injunction pursuant to 35 U.S.C. § 283 prohibiting further infringement of the '753 Patent;

D. An award of treble damages pursuant to 35 U.S.C. § 284 to the extent that Lift and Tow's infringement is ultimately found to be willful;

E. An award to Inventive compensating it for Lift and Tow's false MADE IN USA advertising made in connection with its Accused Dollies, including a forfeit of Lift and Tow's profits on its improperly labeled Accused Dollies.

F. An award to Inventive of its reasonable costs and attorney fees pursuant to 35 U.S.C. § 285 upon a determination that this is an exceptional case justifying such fees;

G. An award to Inventive compensating it for damages sustained as a consequence of Lift and Tow's trademark infringement, false advertising and false designation of origin and to account for all gains, profits, and advantages derived by Lift and Tow's trademark infringement, false advertising and false designation of origin and that the award to Inventive be trebled as provided for under 15 U.S.C. § 1117; alternatively, that the Inventive be awarded statutory damages pursuant to 15 U.S.C. § 1117(c)-(d).

H. That the Court issue an order that Inventive recover the costs of the trademark

infringement, false advertising and false designation of origin action together with reasonable attorney and investigator fees and prejudgment interest in accordance with 15 U.S.C. § 1117;

I. That Lift and Tow be permanently enjoined from directly or indirectly infringing Inventive's SPEED® mark through the impermissible use of the identical SPEED mark, and/or any confusingly similar mark. Any award or injunction should require that any past infringing advertising materials be destroyed by Lift and Tow, and that an explanation of the infringement be sent by Lift and Tow to its relevant consumers;

J. That any infringing Lift and Tow trademark application be cancelled and deemed invalid and unenforceable, as Inventive has prior use rights to the SPEED® mark;

K. That Lift and Tow be permanently enjoined from directly or impliedly making any false advertising or false designation of origin statements to consumers, including but not limited to the current MADE IN USA false advertising claims, and the "bait and switch" use of Inventive's In The Ditch® SPEED® images to pass the Accused Dolly of as an Inventive product; and

L. Such other and further relief as the Court may deem proper and just.

JURY DEMAND

A jury trial is hereby demanded for all issues that are triable to a jury.

Date: February 16, 2024

Respectfully submitted,

/s/ Stanley D. Ference III
Stanley D. Ference III
Pa. ID No. 59899
Ference & Associates LLC
409 Broad Street
Pittsburgh, Pennsylvania 15143
Telephone: (412) 741-8400
Fax: (412) 741-91292
courts@ferencelaw.com

- and -

Michael P. Mazza (*Pro Hac Forthcoming*)
Illinois Bar No. 6201609
Paul R. Hale (*Pro Hac Forthcoming*)
Illinois Bar No. 6320732
Michael P. Mazza, LLC
686 Crescent Blvd.
Glen Ellyn, Illinois 60137-4281
Phone: (630) 858-5071
Fax: (630) 282-7123
Email: mazza@mazzallc.com
paul@mazzallc.com

**Attorneys for the Plaintiff
Inventive, LLC**