

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

TAIT TOWERS MANUFACTURING, LLC,	:	
	:	
Plaintiff	:	
	:	Civil Action No.
v.	:	
	:	JURY TRIAL DEMANDED
WICREATIONS, BVBA,	:	
	:	
Defendant.	:	

**COMPLAINT**

Plaintiff TAIT TOWERS MANUFACTURING, LLC (“TAIT” or “Plaintiff”) files this Complaint against Defendant WICREATIONS, BVBA (“WICREATIONS”) and avers as follows:

**THE PARTIES**

1. Plaintiff TAIT is an LLC organized and existing under the laws of Delaware, with its principal place of business at 401 W. Lincoln Avenue, Lititz, Pennsylvania, 17543.
2. TAIT is a leading supplier of innovative live event staging, engineering, and automation.
3. Upon information and belief, Defendant WICREATIONS is a business entity organized and existing under the laws of Belgium, with its principal place of business at Heistse Hoekstratt 3D, 2220 Hist-op-den-Berg, Belgium.
4. Upon information and belief, WICREATIONS is in the business of live event staging.

**NATURE OF THE ACTION**

5. Plaintiff re-avers and re-states the foregoing Paragraphs inclusively as if fully set forth herein.

6. This is a Civil Action for Infringement of U.S. Patent No. 7,703,401 B2; No. 7,922,416 B2; No. 8,793,876 B2, and No. D675,643 (collectively “the Patents-in-Suit”) under the Patent Laws of the United States, Title 35 U.S.C. § 1 *et seq.*

7. The Patents-in-Suit concern TAIT’s proprietary “Mag Deck” staging system which uses interlocking decks to create a monolithic performing surface while minimizing setup/strike time and labor.

8. Defendant has developed a competing staging system, “WIDECK”, elements of which infringe upon the Patents-in-Suit.

9. Defendant has used the infringing “WIDECK” staging system at events in the United States, including, but not limited to, the tour of popular musical artist Bad Bunny, which included an April 19, 2024 performance at the Wells Fargo Center at 3601 S. Broad Street, Philadelphia, Pennsylvania.

### **JURISDICTION AND VENUE**

10. Plaintiff re-avers and re-states the foregoing Paragraphs inclusively as if fully set forth herein.

11. This Court has jurisdiction over the subject matter of this action pursuant to Title 28 U.S.C. §§ 1331 and 1338(a) because it arises under the Patent Laws of the United States, including Title 35 U.S.C. § 271 *et seq.*

12. This Court has personal jurisdiction over Defendant because, among other things, Defendant has committed, aided, abetted, contributed to, and/or participated in the commission of patent infringement in violation of Title 35 U.S.C. § 271 in this judicial district that has led to foreseeable harm and injury to Plaintiff.

13. Venue of this action is proper in this Judicial District under 28 U.S.C. § 1391(b)(2) as a substantial part of the events giving rise to Plaintiff's claims has occurred and will continue to occur in this District, as well as others.

**COUNT I: INFRINGEMENT OF U.S. PATENT NO. 7,703,401 B2**

14. Plaintiff re-avers and re-states the foregoing Paragraphs inclusively as if fully set forth herein.

15. On April 27, 2010, United States Patent No. 7,703,401 B2 (the "'401 Patent", attached as Exhibit "A"), was duly and legally issued for a Portable Locking Support Structure.

16. Plaintiff is the owner of the '401 Patent.

17. Defendant has infringed and is still infringing the '401 Patent directly and indirectly, by making, using, selling, offering for sale, and/or importing into the United States products encompassed by the '401 Patent, including, for example, the "WIDECK" staging system.

18. Defendant has knowledge of the '401 Patent and Defendant's infringement is and continues to be willful and deliberate.

19. Under Title 35 U.S.C. § 285, Defendant's infringement of the '401 Patent renders this case exceptional.

20. As a result of Defendant's acts of infringement, Plaintiff has suffered and will continue to suffer damages in an amount to be proven at Trial.

**COUNT II: INFRINGEMENT OF U.S. PATENT NO. 7,922,416 B2**

21. Plaintiff re-avers and re-states the foregoing Paragraphs inclusively as if fully set forth herein.

22. On April 12, 2011, United States Patent No. 7,922,416 B2 (the "'416 Patent", attached as Exhibit "B"), was duly and legally issued for a Portable Locking Support Structure.

23. Plaintiff is the owner of the '416 Patent.

24. Defendant has infringed and is still infringing the '416 Patent directly and indirectly, by making, using, selling, offering for sale, and/or importing into the United States products encompassed by the '416 Patent, including, for example, the "WIDECK" staging system.

25. Defendant has knowledge of the '416 Patent and Defendant's infringement is and continues to be willful and deliberate.

26. Under Title 35 U.S.C. § 285, Defendant's infringement of the '416 Patent renders this case exceptional.

27. As a result of Defendant's acts of infringement, Plaintiff has suffered and will continue to suffer damages in an amount to be proven at Trial.

**COUNT III: INFRINGEMENT OF U.S. PATENT NO. 8,793,876 B2**

28. Plaintiff re-avers and re-states the foregoing Paragraphs inclusively as if fully set forth herein.

29. On August 5, 2014, United States Patent No. 8,793,876 B2 (the "'876 Patent", attached as Exhibit "C"), was duly and legally issued for a Method of Assembling a Portable Support Structure.

30. Plaintiff is the owner of the '876 Patent.

31. Defendant has infringed and is still infringing the '876 Patent directly and indirectly, by making, using, selling, offering for sale, and/or importing into the United States methods encompassed by the '876 Patent, including, for example, the "WIDECK" staging system.

32. Defendant has knowledge of the '876 Patent and Defendant's infringement is and continues to be willful and deliberate.

33. Under Title 35 U.S.C. § 285, Defendant's infringement of the '876 Patent renders this case exceptional.

34. As a result of Defendant's acts of infringement, Plaintiff has suffered and will continue to suffer damages in an amount to be proven at Trial.

**COUNT IV: INFRINGEMENT OF U.S. PATENT NO. D675,343**

35. Plaintiff re-avers and re-states the foregoing Paragraphs inclusively as if fully set forth herein.

36. On August 5, 2014, United States Patent No. D675,343 (the "'343 Patent", attached as Exhibit "D"), was duly and legally issued for a design of a Staging Support Structure.

37. Plaintiff is the owner of the '343 Patent.

38. Defendant has infringed and is still infringing the '343 Patent directly and indirectly, by making, using, selling, offering for sale, and/or importing into the United States designs encompassed by the '343 Patent, including, for example, the "WIDECK" staging system.

39. Defendant has knowledge of the '343 Patent and Defendant's infringement is and continues to be willful and deliberate.

40. Under 35 U.S.C. § 285, Defendant's infringement of the '343 Patent renders this case exceptional.

41. As a result of Defendant's acts of infringement, Plaintiff has suffered and will continue to suffer damages in an amount to be proven at Trial.

**REQUEST FOR RELIEF**

WHEREFORE, Plaintiff seeks judgment awarding it the following relief:

(a) judgment in favor of Plaintiff, that Defendant has infringed, directly and/or indirectly by way of inducement and/or contributory infringement, the '401 Patent;

(b) judgment in favor of Plaintiff that Defendant has infringed, directly and/or indirectly by way of inducement and/or contributory infringement, the '416 Patent;

(c) judgment in favor of Plaintiff that Defendant has infringed, directly and/or indirectly by way of inducement and/or contributory infringement, the '876 Patent;

(d) judgment in favor of Plaintiff that Defendant has infringed, directly and/or indirectly by way of inducement and/or contributory infringement, the '343 Patent

(e) an award of monetary damages to which Plaintiff is entitled under Title 35 U.S.C. § 284 for Defendant's past infringement and any continuing or future infringement, including both compensatory damages and treble damages for willful infringement;

(f) a judgment and order, pursuant to Title 35 U.S.C. § 285, requiring Defendant to pay the costs of this action, including all disbursements and attorney's fees;

(g) an award of pre-judgment and post-judgment interest;

(h) an order awarding such other and further relief as this Court deems just and proper.

Plaintiff hereby demands a Trial by Jury on all issues so triable.

Dated: April 24, 2024

Respectfully submitted,

SAXTON & STUMP, LLC

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