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10	Attorneys for Plaintiff		
11	UNITED STATES DISTRICT COURT		
12	DISTRICT OF NEVADA		
13	TITAN INTERNATIONAL TECHNOLOGIES, LTD.,	Case No.: 2:24-cv-861	
14	Plaintiff,	COMPLAINT FOR PATENT	
15	v.	INFRINGEMENT	
16	COBRA FIRING SYSTEMS, LLC, and PHANTOM FIREWORKS OF PAHRUMP,	DEMAND FOR JURY TRIAL	
17	Defendant.		
18	Defendant.		
19	Plaintiff Titan International Technologies Ltd. ("Plaintiff") hereby states its Complaint		
20	against Defendants Cobra Firing Systems,	LLC and Phantom Fireworks of Pahrump	
21	("Defendants") as follows:		
22	<u>PARTIES</u>		
23	1. Plaintiff Titan International Technologies Ltd. is a corporation organized and		
24	existing under the laws of Hong Kong, and has its principal place of business at 6A Kung Ngam		
25	Village Road, Unit 5A, Centrosound Industrial Boulevard, Hong Kong SAR, China.		
26	2. Defendant Cobra Firing Systems,	LLC is, on information and belief, a Nevada	
27	limited liability company, and has its principal pla	ace of business in Gansevoort, NY.	
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3. Defendant Phantom Fireworks of Pahrump is a company that has its principal place of business at 921 South Highway 160, in Pahrump, NV 89048.

JURISDICTION & VENUE

- 4. This is an action for patent infringement arising under the Patent Laws of the United States as set forth in Title 35 of the United States Code Section 271, *et seq*.
- 5. The jurisdiction of this Court arises under 28 U.S.C. §§1331 and 1338(a). Venue is proper in this Court under 28 USC §1400(b), in part because Defendant Cobra is incorporated within this judicial district, and Defendant Phantom Fireworks has a place of business in Pahrump, NV, within this judicial district.

GENERAL ALLEGATIONS

- 6. By assignment, Plaintiff owns United States Patent Numbers 11,733,009 (the "'009 patent") and 11,709,037 (the "'037 patent"), issued on August 23, 2023, and July 25, 2023, respectively, both entitled Automated Detonation of Fireworks. Copies of these two patents are attached to this complaint as Exhibit A, and are incorporated herein by this reference.
- 7. Since at least July 27, 2023, Plaintiff has sold, in the United States, products marked with the 037 and 009 patent numbers, namely, Ignite i18 and Ignite i36.
- 8. Since at least July 27, 2023, Defendants have sold, and offered for sale, in the United States, and in this judicial district, products that infringe at least claim 1 of the 009 patent and at least claim 11 of the 037 patent, namely, Ignite i18 and Ignite i36. These infringing sales continue to date, upon information and belief.
- 9. As a result of Defendants' infringement, Plaintiff has been monetarily damaged, and will continue to be damaged. The amount of these damages is unknown, but these damages continue to accrue as Defendants' infringement continues.

FIRST CLAIM FOR RELIEF

Infringement of U.S. Patent No. 11,733,009

10. Plaintiff repeats and realleges the allegations set forth above as though fully set forth herein.

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- 11. The '009 Patent, entitled Automated Detonation of Fireworks was duly and legally issued on August 23, 2023.
- 12. The '009 Patent has been in full force and effect since its issuance. Plaintiff owns by assignment the entire right, title and interest in and to the '009 Patent, including the exclusive right to seek damages for past, current and future infringement thereof.
- 13. Since at least July 27, 2023, Defendants have sold, and offered for sale, in the United States, and in this judicial district, products that infringe at least claim 1 of the '009 patent, namely, Ignite i18 and Ignite i36. These infringing sales continue to date, upon information and belief.
- 14. As a result of Defendants' infringement, Plaintiff has been monetarily damaged, and will continue to be damaged. The amount of these damages is unknown, but these damages continue to accrue as Defendants' infringement continues.

SECOND CLAIM FOR RELIEF

Infringement of U.S. Patent No. 11,709,037

- 15. Plaintiff repeats and realleges the allegations set forth above as though fully set forth herein.
- 16. The '037 Patent, entitled Automated Detonation of Fireworks was duly and legally issued on July 25, 2023.
- 17. The '037 Patent has been in full force and effect since its issuance. Plaintiff owns by assignment the entire right, title and interest in and to the '009 Patent, including the exclusive right to seek damages for past, current and future infringement thereof.
- 18. Since at least July 27, 2023, Defendants have sold, and offered for sale, in the United States, and in this judicial district, products that infringe at least claim 11 of the '037 patent, namely Ignite i18 and Ignite i36. These infringing sales continue to date, upon information and belief.
- 19. As a result of Defendants' infringement, Plaintiff has been monetarily damaged, and will continue to be damaged. The amount of these damages is unknown, but these damages continue to accrue as Defendants' infringement continues.

1	WHEREFORE, Plaintiff prays for judgment as follows:
2	1. A finding that Defendants have infringed the '009 and '037 patents;
3	2. An award to Plaintiff of its damages resulting from Defendants' infringement of
4	the '009 and '037 patents, as provided in 35 U.S.C. §284;
5	3. An award to Plaintiff of prejudgment interest on all damages incurred;
6	4. An award to Plaintiff of its costs in this action, and of reasonable attorney's fees as
7	provided in 35 U.S.C. §285; and
8	5. Such other and further relief against Defendants in favor of Plaintiff as this court
9	deems just, equitable and proper.
10	JURY DEMAND
11	Plaintiff respectfully demands a jury trial on all issues so triable.
12	DATED this 7th day of May 2024.
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14	By: /s/ Dustun H. Holmes
15	Dustun H. Holmes, Esq., #12776 MCMENEMY HOLMES PLLC
16	1645 Village Center Circle, Suite 291 Las Vegas, Nevada 89134
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19	Los Angeles, CA 90064
20	Attorneys for Plaintiff
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