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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 TITAN INTERNATIONAL
14 TECHNOLOGIES, LTD.,

15 Plaintiff,

16 v.

17 COBRA FIRING SYSTEMS, LLC, and
18 PHANTOM FIREWORKS OF PAHRUMP,

19 Defendant.

Case No.: 2:24-cv-861

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

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 **PARTIES**

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 place of business in Gansevoort, NY.

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