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Attorneys for Plaintiff MY TWO LADIES LLC

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO  
POCATELLO OFFICE

MY TWO LADIES LLC, a Wisconsin  
Limited Liability Company,

Plaintiff,

vs.

TWICE SHEARED SHEEP, LLC, an Idaho  
Limited Liability Company,

Defendant.

Case No. <>

COMPLAINT

Jury Trial Requested

Plaintiff, for its Complaint, alleges as follows:

**THE PARTIES**

1. Plaintiff, My Two Ladies LLC (“My Two Ladies” or “Plaintiff”) is a Wisconsin limited liability company having a place of business at 6008 Spring Valley Rd, Burlington, Wisconsin 53105.

2. On information and belief, defendant Twice Sheared Sheep, LLC (“Twice Sheared Sheep” or “Defendant”) is an Idaho limited liability company having a principal address of 629 Brent Street, Pocatello, Idaho 83201.

**JURISDICTION AND VENUE**

3. This is a civil action for patent infringement arising under the patent laws of the United States, United States Code, Title 35 including, without limitation, Sections 271, 281, 283, 284 and 285, and subject matter jurisdiction of this court is conferred by United States Code, Title 28, Section 1338(a).

4. This Court has personal jurisdiction over defendant Twice Sheared Sheep because Twice Sheared Sheep is an Idaho limited liability company and because Twice Sheared Sheep conducts continuous and systematic business within Idaho and within this district from its principal place of business in Pocatello, Idaho, and has committed infringing acts within Idaho and within this district.

5. Venue is proper in this district under 28 U.S.C. §1400(b) because Defendant is an Idaho limited liability company and therefore resides in Idaho.

**STATEMENT OF FACTS**

6. Plaintiff repeats and re-alleges each and every allegation of the paragraphs above as though fully set forth herein.

7. My Two Ladies is the lawful owner of United States Patent No. 10,351,980, entitled “Adjustable Knitting Needle and Method for Knitting” (the ‘980 patent).

8. The ‘980 patent has been duly examined and issued by the United States Patent and Trademark Office (“USPTO”).

9. A true and correct copy of the ‘980 patent is attached as Exhibit A.

10. As the owner of the ‘980 patent, My Two Ladies is authorized and has standing to bring legal action to enforce all rights arising under the ‘980 patent.

11. The ‘980 patent claims include assemblies and methods for knitting needles, including an assembly of a knitting needle, a flexible cord connected to the needle, and an adjustable stop disposed on the cord.

12. Defendant was first registered as an Idaho limited liability company on January 15, 2020 and its registered agent is Dawn Prickett, 629 Brent Street Pocatello, Idaho 83201.

13. Upon information and belief, Dawn Prickett is the owner of Twice Sheared Sheep.

14. Defendant operates a website at the domain <https://twiceshearedsheep.com/>.

15. Defendant sells knitting paraphernalia, including “Cable Locks – Circular Needle Cord Stops”.

16. Defendant’s website at <https://twiceshearedsheep.com/products/cable-locks-circular-needle-cord-stops-2-pair> displays a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

17. The packaging of Defendant's "Cable Locks – Circular Needle Cord Stops" displays a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

18. Defendant operates a YouTube channel at the domain <https://www.youtube.com/@TwiceShearedSheep>.

19. Defendant's YouTube channel at <https://www.youtube.com/shorts/Kw6Z3YjwTqA> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

20. Defendant's YouTube channel at <https://www.youtube.com/shorts/jkieA9-AQbU> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

21. Defendant's YouTube channel at <https://www.youtube.com/shorts/OXU0YSisAss> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

22. Defendant's YouTube channel at <https://www.youtube.com/shorts/nZqBKFy28fY> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

23. Defendant operates an Instagram account at <https://www.instagram.com/twiceshearedsheep/>.

24. Defendant's Instagram account at <https://www.instagram.com/p/Czr3NXAP7ly/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

25. Defendant's Instagram account at <https://www.instagram.com/p/CzrJ6ncIyRY/> shows a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

26. Defendant's Instagram account at <https://www.instagram.com/p/CyCBrGayNPZ/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

27. Defendant's Instagram account at [https://www.instagram.com/p/CwdDaMLr96V/?img\\_index=1](https://www.instagram.com/p/CwdDaMLr96V/?img_index=1) and [https://www.instagram.com/p/CwdDaMLr96V/?img\\_index=3](https://www.instagram.com/p/CwdDaMLr96V/?img_index=3) instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

28. Defendant's Instagram account at [https://www.instagram.com/p/Cwaen5jPp\\_1/?img\\_index=5](https://www.instagram.com/p/Cwaen5jPp_1/?img_index=5) instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

29. Defendant's Instagram at <https://www.instagram.com/p/CwQ40cHpVkJ/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

30. Defendant's Instagram at [https://www.instagram.com/p/CwOVfKGA\\_wO/](https://www.instagram.com/p/CwOVfKGA_wO/) instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

31. Defendant's Instagram at [https://www.instagram.com/p/CwNmpjYuMGR/?img\\_index=1](https://www.instagram.com/p/CwNmpjYuMGR/?img_index=1) instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

32. Defendant's Instagram at <https://www.instagram.com/p/CuCjuDMPONG/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

33. Defendant's Instagram at <https://www.instagram.com/p/Ct4QiVmPlIB/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

34. Defendant's Instagram at <https://www.instagram.com/p/CsbtvymJSEI/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

35. Defendant's Instagram at [https://www.instagram.com/p/CrGlrueBEDs/?img\\_index=1](https://www.instagram.com/p/CrGlrueBEDs/?img_index=1) instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

36. Defendant's Instagram at [https://www.instagram.com/p/CrEA4inBBxx/?img\\_index=5](https://www.instagram.com/p/CrEA4inBBxx/?img_index=5) instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

37. Defendant's Instagram at <https://www.instagram.com/p/Cq3yYLsv9Fv/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

38. Defendant's Instagram at [https://www.instagram.com/p/Cqx\\_UvEhMwr/?img\\_index=4](https://www.instagram.com/p/Cqx_UvEhMwr/?img_index=4) instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

39. Defendant's Instagram at <https://www.instagram.com/p/Cqtb5M0J9ou/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

40. Defendant's Instagram at <https://www.instagram.com/p/CpLwQVRr4oP/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

41. Defendant's Instagram at [https://www.instagram.com/p/CpLGY8bBnBT/?img\\_index=2](https://www.instagram.com/p/CpLGY8bBnBT/?img_index=2) shows a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

42. Defendant's Instagram at [https://www.instagram.com/p/CokedwnBi2v/?img\\_index=1](https://www.instagram.com/p/CokedwnBi2v/?img_index=1) and [https://www.instagram.com/p/CokedwnBi2v/?img\\_index=3](https://www.instagram.com/p/CokedwnBi2v/?img_index=3) instructs a user on how to use knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

43. Defendant's Instagram at [https://www.instagram.com/p/Coh5q92hSCZ/?img\\_index=4](https://www.instagram.com/p/Coh5q92hSCZ/?img_index=4) instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

44. Defendant's Instagram at <https://www.instagram.com/p/CodfTYSrGKv/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

45. Defendant's Instagram at <https://www.instagram.com/p/CoYP2MjP1oj/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

46. Defendant's Instagram at [https://www.instagram.com/p/CoVyIEjO\\_oD/](https://www.instagram.com/p/CoVyIEjO_oD/) instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

47. Defendant's Instagram at <https://www.instagram.com/p/CoVBselhVpd/> shows a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

48. Defendant's Instagram at <https://www.instagram.com/p/CmcsjN-JQbJ/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.

49. Defendant's Instagram at <https://www.instagram.com/p/CmcAVZIBFyu/> instructs a user on how to use a knitting needle with a flexible cord attached to the knitting needle and an adjustable stop disposed on the cord.



50. On March 8, 2024, legal counsel for Plaintiff sent correspondence to Defendant demanding that they cease infringement of the '980 patent.

51. Defendant directly infringes one or more claims of the '980 patent when using its "Cable Locks" to create the patented assembly.

52. Defendant indirectly infringes one or more claims of the '980 patent when it instructs its customers to use "Cable Locks" to build the patented assembly.

**COUNT I – INFRINGEMENT OF U.S. PATENT NO. 10,351,980**

53. Plaintiff repeats and re-alleges each and every allegation of the paragraphs above as though fully set forth herein.

54. Defendant infringed, and is currently infringing, at least claims 1, 2, 4-9, 11, and 17-20 of the '980 patent in violation of 35 U.S.C. § 271(a) by using and displaying the patented assembly and method.

55. Defendant has actively induced infringement, and is currently actively inducing infringement, of at least claims 1, 2, 4-9, 11, and 17-20 of the '980 patent in violation of 35 U.S.C. § 271(b) by promoting, advertising, instructing, facilitating, and supporting others, without license or authority, to use Defendant's "Cable Locks" to create the patented assembly.

56. On information and belief, Defendant specifically intends to induce infringement of the '980 patent and knows it will induce acts that constitute infringement of the '980 patent.

57. Defendant engaged in the foregoing conduct with respect to the '980 patent during the term of the patent and without authority from Plaintiff.

58. Defendant's infringement of one or more claims of the '980 patent has been and will continue to be willful, deliberate, and intentional.

59. As a direct and proximate result of defendants' infringement of one or more claims of the '980 patent, Plaintiff has been and will continue to be irreparably damaged and deprived of its rights in the '980 patent in amounts not yet determined, and for which Plaintiff is entitled to relief.

**PRAYER FOR RELIEF**

WHEREFORE, plaintiff My Two Ladies prays for a judgment that:

- A. Defendant has infringed the '980 patent;
- B. Defendant's infringement of the '980 patent is willful;
- C. Defendant, its officers, directors, employees, agents, subsidiaries, licensees, servants, successors and assigns, and any and all persons acting in privity or in concert or participation with such defendant, be permanently enjoined from infringement of the '980 patent under 35 U.S.C. § 283;
- D. Plaintiff be awarded all damages adequate to compensate Plaintiff for Defendant's infringement of the '980 patent, and such damages be trebled under 35 U.S.C. § 284 and awarded to Plaintiff, with pre-judgment and post-judgment interest as allowed by law;
- E. This case be adjudged an exceptional case under 35 U.S.C. § 285, and Plaintiff be awarded attorneys' fees, expert witness fees, costs, and all expenses incurred in this action, with interest;
- F. Plaintiff be awarded all actual and compensatory damages; and
- G. Plaintiff be awarded such other and further relief as the Court deems just and proper.

**JURY DEMAND**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all issues triable by jury.

DATED THIS 14th day of June, 2024.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By /s/ Kenneth C. Howell  
Kenneth C. Howell, ISB No. 3235  
Attorneys for Plaintiff MY TWO LADIES LLC

**VERIFICATION**

Verification of Pleading

Declaration under Penalty of Perjury Form

by Party

My Two Ladies, LLC v. Twice Sheared Sheep LLC

I, Steve Springsteen, declare I am a Principal of My Two Ladies LLC, Plaintiff in the above-entitled matter.

I have read the foregoing Complaint and know the contents thereof.

The same is true of my own knowledge, except as to those matters which are therein stated on information and belief, and, as to those matters, I believe it to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 06/13/2024, 2024

*Steve P Springsteen*

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Steve Springsteen  
My Two Ladies LLC



**SIGNATURE CERTIFICATE**



**REFERENCE NUMBER**

5CBC1894-DC6A-414C-92F1-2ACD6157AF8D

**TRANSACTION DETAILS**

**Reference Number**

5CBC1894-DC6A-414C-92F1-2ACD6157AF8D

**Transaction Type**

Signature Request

**Sent At**

06/13/2024 13:59 -07:00

**Executed At**

06/13/2024 14:15 -07:00

**Identity Method**

email

**Distribution Method**

email

**Signed Checksum**

a737b634d4c0a15abd44e54ad89cebf00341be8cbfec26e62dabc5ae72f109d6

**Signer Sequencing**

Disabled

**Document Passcode**

Disabled

**DOCUMENT DETAILS**

**Document Name**

Complaint

**Filename**

Complaint.pdf

**Pages**

12 pages

**Content Type**

application/pdf


**File Size**

27 KB

**Original Checksum**

acf6731b3d7df6c9110d3908d35f3eb6e53c39b43d1fd6b2718da7bb193d632d

**SIGNERS**

SIGNER	E-SIGNATURE	EVENTS
<b>Name</b> Steve Springsteen	<b>Status</b> signed	<b>Viewed At</b> 06/13/2024 14:00 -07:00
<b>Email</b> steve@mytwoladies.com	<b>Multi-factor Digital Fingerprint Checksum</b> 6712ac9279661a9f22406c5d1ae23290cf22d97c0233b327acf01da594e40756	<b>Identity Authenticated At</b> 06/13/2024 14:15 -07:00
<b>Components</b> 2	<b>IP Address</b> 65.27.59.139	<b>Signed At</b> 06/13/2024 14:15 -07:00
	<b>Device</b> AVG Secure Browser via Windows	
	<b>Typed Signature</b> 	
	<b>Signature Reference ID</b> 27860A57	

**AUDITS**

TIMESTAMP	AUDIT
06/13/2024 20:59 +00:00	Kari Schofer (kschofer@hawleytroxell.com) created document 'Complaint.pdf' on Microsoft Edge via Windows from 52.45.54.47.
06/13/2024 20:59 +00:00	Steve Springsteen (steve@mytwoladies.com) was emailed a link to sign.
06/13/2024 21:00 +00:00	Steve Springsteen (steve@mytwoladies.com) viewed the document on AVG Secure Browser via Windows from 65.27.59.139.
06/13/2024 21:15 +00:00	Steve Springsteen (steve@mytwoladies.com) authenticated via email on AVG Secure Browser via Windows from 65.27.59.139.
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