

1 Jason de Bretteville (State Bar No. 195069)  
2 jdebretteville@stradlinglaw.com  
3 Stradling Yocca Carlson & Rauth LLP  
4 600 Newport Center Drive, Suite 1600  
5 Newport Beach, CA 92660  
6 Telephone: (949) 725-4000  
7 Facsimile: (949) 725-4100

8 Michael L. Krashin (*pro hac vice* forthcoming)  
9 mkrashin@bannerwitcoff.com  
10 Victoria R. M. Webb (*pro hac vice* forthcoming)  
11 vwebb@bannerwitcoff.com  
12 Kimberly S. Devine (*pro hac vice* forthcoming)  
13 kdevine@bannerwitcoff.com  
14 Banner & Witcoff, Ltd.  
15 71 Wacker Drive, Suite 3600  
16 Chicago, IL 60606  
17 Telephone: (312) 463-5000  
18 Facsimile: (312) 463-5001

19 Attorneys for Plaintiff  
20 YETI COOLERS, LLC

21 **UNITED STATES DISTRICT COURT**  
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 YETI COOLERS, LLC,

24 Plaintiff,

25 v.

26 MacSports, Inc. and Tofasco of  
27 America, Inc.

28 Defendants.

Case No.

**COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF FOR PATENT  
INFRINGEMENT UNDER 35 U.S.C. §  
271**

**AND DEMAND FOR JURY TRIAL**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**COMPLAINT**

Plaintiff YETI Coolers, LLC (“YETI”) for its Complaint against MacSports, Inc. (“MacSports”) and Tofasco of America, Inc. (“Tofasco”) (MacSports and Tofasco, collectively, “Defendants”), alleges as follows:

**The Parties**

1. YETI is a limited liability company organized and existing under the laws of the State of Delaware with a principal place of business at 7601 Southwest Parkway, Austin, Texas 78735.

2. On information and belief, MacSports is a corporation organized and existing under the laws of the State of California with a place of business at 2083 Puddingstone Drive, La Verne, California 91750.

3. On information and belief, Tofasco is a corporation organized and existing under the laws of the State of California with a place of business at 1661 Fairplex Drive, La Verne, California 91750.

4. On information and belief, MacSports and Tofasco are related corporate entities.

5. On information and belief, MacSports and Tofasco have or have previously had the same labor and/or management.

6. On information and belief, MacSports and Tofasco have places of business located adjacent to each other and/or within 1/10 of a mile of each other.

7. On information and belief, MacSports and Tofasco share or have previously shared the same physical location and/or facilities.

8. On information and belief, one or more employees of Tofasco are or previously were responsible for marketing and/or selling products for MacSports, including chairs.

9. Tofasco is the named owner of multiple U.S. trademark applications and registrations for MAC SPORTS, including for chairs.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**Jurisdiction and Venue**

10. This is an action for patent infringement. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

11. This Court has subject matter jurisdiction over this action pursuant to at least 28 U.S.C. §§ 1331 and 1338(a).

12. This Court has personal jurisdiction over MacSports and Tofasco because, *inter alia*, MacSports and Tofasco are each a company organized and existing under the laws of the State of California. This Court also has personal jurisdiction over MacSports and Tofasco because, *inter alia*, each have a principal places of business in the State of California and in this District. This Court also has personal jurisdiction over MacSports and Tofasco because, *inter alia*, they are purposefully and intentionally availing themselves of the privileges of doing business in the State of California, including in this District. For example, MacSports and Tofasco have made, used, offered to sell, sold, and/or imported, and continue to make, use, offer to sell, sell, and/or import infringing products to customers and/or potential customers, including in this District.

13. Venue is proper in this District pursuant to at least 28 U.S.C. §§ 1391(a)-(d) and 28 U.S.C. § 1400(b).

**YETI’s Intellectual Property**

14. For years, YETI has continuously engaged in the design, development, manufacture, promotion, and sale of, among other things, its Trailhead® Camp Chair. YETI has invested substantial resources into the research, design, and development of its products, including its Trailhead® Camp Chair.

15. YETI’s research, design, and development have led to many innovative product designs and technologies, including designs and technologies at issue in this lawsuit.

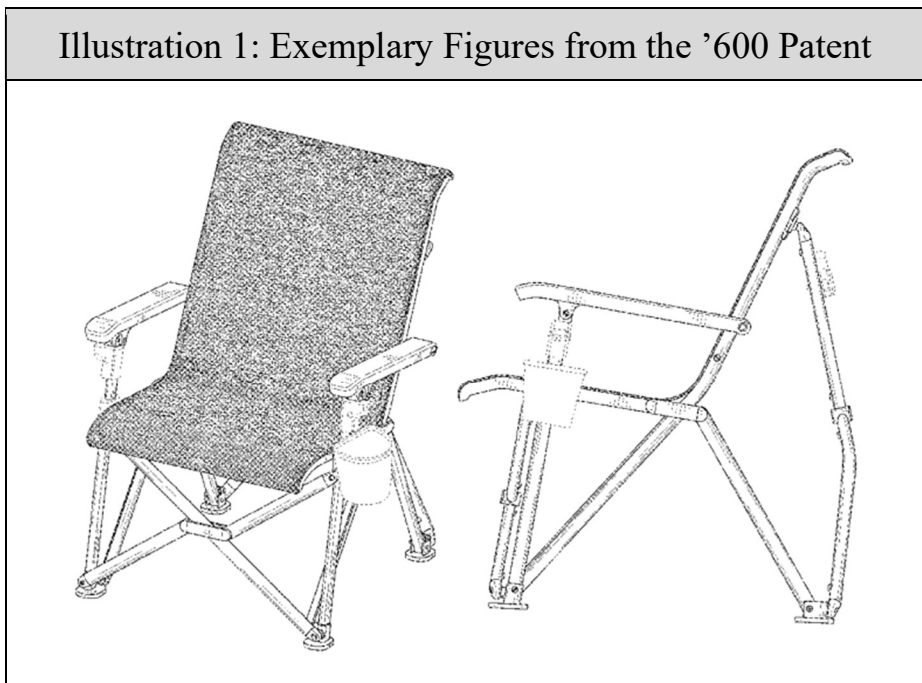
16. For example, YETI owns U.S. Patent No. 10,874,219 (“the ’219 Patent”), U.S. Patent No. 11,389,003 (“the 003 Patent”), U.S. Design Patent No.

1 D941,600 (“the ’600 Patent”), U.S. Design Patent No. D955,132 (“the ’132  
2 Patent”), U.S. Design Patent No. D1,027,523 (“the ’523 Patent”), and U.S. Design  
3 Patent No. D1,030,340 (“the ’340 Patent”).

4 17. The ’219 Patent is titled “Portable Chair.” On December 29, 2020, the  
5 ’219 Patent was duly and legally issued by the U.S. Patent Office to YETI. YETI  
6 owns the entire right, title, and interest to the ’219 Patent. A copy of the ’219 Patent  
7 is attached as Exhibit 1.

8 18. The ’003 Patent is titled “Portable Chair.” On July 19, 2022, the ’003  
9 Patent was duly and legally issued by the U.S. Patent Office to YETI. YETI owns  
10 the entire right, title, and interest to the ’003 Patent. A copy of the ’003 Patent is  
11 attached as Exhibit 2.

12 19. The ’600 Patent is titled “Portable Chair.” On January 25, 2022, the  
13 ’600 Patent was duly and legally issued by the U.S. Patent Office to YETI. YETI  
14 owns the entire right, title, and interest to the ’600 Patent. A copy of the ’600 Patent  
15 is attached as Exhibit 3. Exemplary figures from the ’600 Patent are shown in  
16 Illustration 1 below:









1 and they must stop. MacSports and Tofasco must also compensate YETI for their  
2 violations of the law.

3 25. MacSports’ and Tofasco’s infringing products include their Heavy  
4 Duty Camp Chair.

5 26. Exemplary images of Defendants’ Heavy Duty Camp Chair are shown  
6 below in Illustration 5.



25 27. Defendants describe their Heavy Duty Camp Chair as, among other  
26 things, having a “stretch-tight fabric” that “[p]rovides support and molds to your  
27 body,” as having a “[l]ocking mechanism” so the “[c]hair locks open for extra  
28 stability,” and as a chair that can “fold” and “take [] virtually everywhere.”



1 28. Exemplary images of Defendants’ descriptions on their product listing  
2 and on the packaging that accompanies the infringing Heavy Duty Camp Chair are  
3 shown below in Illustration 6.

**Illustration 6: Exemplary Images of Defendants’ Descriptions of their Heavy Duty Camp Chair**





**Stretch-tight Fabric**  
Provides support and molds to your body



**Locking Mechanism**  
Chair lock opens for extra stability

**Mac Sports Heavy Duty Camp Chair**

The Mac Sports Heavy-Duty Camp Chair is the throne you deserve after a long day of adventures. Using only the finest materials this will be your new go-to chair, great for camping, sporting events, concerts, or even just hanging in the backyard. The Heavy-Duty Camp Chair comes with an oversized backpack style carry bag which allows you to take it virtually everywhere leaving your hands free along the way. Once set up you will notice all the amazing features like its rigid aluminum frame, breathable stretch-tight fabric, 2 convenient cup holders, and the chair locks open for extra stability. It is perfect for any outdoor use where additional seating is required.

1           29. As an example, and as can be seen in Illustration 7 below, each of the  
2 vertical legs of Defendants’ Heavy Duty Camp Chair include a leg locking system  
3 for locking an outer leg to an inner leg when the chair is in an unfolded position.



6  
7  
8  
9  
10  
11  
12  
13  
14           30. As another example, and as can be seen in Illustration 8 below,  
15 Defendants’ Heavy Duty Camp Chair has a core placed into a hollow section  
16 created by an overlap of a suspension fabric, and the core in the hollow section is  
17 secured in a notch asymmetrically located in a top portion of a pair of diagonally  
18 extending backrest bars.  
19

20 ///  
21 ///  
22 ///  
23 ///  
24 ///  
25 ///  
26 ///  
27 ///  
28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Illustration 8: Exemplary Images of Defendants’ Heavy Duty Camp Chair Showing a Core Secured in a Notch



**Count I:**

**Patent Infringement of U.S. Patent No. 10,874,219 Under 35 U.S.C. § 271**

31. YETI realleges and incorporates the allegations set forth in paragraphs 1 through 30 as though fully set forth herein.

32. MacSports and Tofasco have infringed and continue to infringe the '219 Patent at least by using, selling, offering to sell, making, and/or importing into the United States their Heavy Duty Camp Chair, which includes each and every element of one or more claims of the '219 Patent, either literally or through the doctrine of equivalents, including at least claim 7. For example, claim 7 of the '219 Patent recites “[a] folding chair” comprising “a seat pan being formed by a pair of seat bars, the seat pan being tensioned by a pair of vertical legs; a backrest being formed by a pair of diagonally extending backrest bars; a front frame formed by a pair of cross bars; a rear frame formed by rear cross bars; and a pair of armrests; wherein the seat pan and the backrest are formed of a suspension fabric wherein the suspension fabric has an overlap and a core placed into a hollow section created by the overlap and wherein the core in the hollow section is secured in a notch asymmetrically located in a top portion of the pair of diagonally extending backrest

1 bars; wherein the vertical legs are each provided with an inner leg and an outer leg  
2 and the inner leg is configured to telescope out of the outer leg; and wherein each of  
3 the vertical legs include a leg locking system for locking the outer leg to the inner  
4 leg when the chair is in an unfolded position.”

5 33. MacSports’ and Tofasco’s Heavy Duty Camp Chair infringes at least  
6 claim 7 of the ‘219 Patent because it is folding chair that includes all of the claim  
7 elements of at least claim 7, either literally or through the doctrine of equivalents,  
8 including “a seat pan being formed by a pair of seat bars, the seat pan being  
9 tensioned by a pair of vertical legs,” “a backrest being formed by a pair of  
10 diagonally extending backrest bars,” “a front frame formed by a pair of cross bars,”  
11 “a rear frame formed by rear cross bars,” “a pair of armrests,” “wherein the seat pan  
12 and the backrest are formed of a suspension fabric wherein the suspension fabric has  
13 an overlap and a core placed into a hollow section created by the overlap and  
14 wherein the core in the hollow section is secured in a notch asymmetrically located  
15 in a top portion of the pair of diagonally extending backrest bars,” “wherein the  
16 vertical legs are each provided with an inner leg and an outer leg and the inner leg is  
17 configured to telescope out of the outer leg,” and “wherein each of the vertical legs  
18 include a leg locking system for locking the outer leg to the inner leg when the chair  
19 is in an unfolded position.”

20 34. For example, MacSports’ and Tofasco’s Heavy Duty Camp Chair is a  
21 folding chair that has a seat pan being formed by a pair of seat bars, with the seat  
22 pan being tensioned by a pair of vertical legs. The Heavy Duty Camp Chair also has  
23 a backrest being formed by a pair of diagonally extending backrest bars, a front  
24 frame formed by a pair of cross bars, a rear frame formed by rear cross bars, and a  
25 pair of armrests. The seat pan and the backrest of Defendants’ Heavy Duty Camp  
26 Chair are formed of a suspension fabric, the suspension fabric has an overlap and a  
27 core placed into a hollow section created by the overlap, and the core in the hollow  
28 section is secured in a notch asymmetrically located in a top portion of the pair of

1 diagonally extending backrest bars. The vertical legs of Defendants’ Heavy Duty  
2 Camp Chair are each provided with an inner leg and an outer leg and the inner leg is  
3 configured to telescope out of the outer leg, and each of the vertical legs include a  
4 leg locking system for locking the outer leg to the inner leg when the chair is in an  
5 unfolded position.

6 35. Defendants’ acts of infringement have been without express or implied  
7 license by YETI, are in violation of YETI’s rights, and will continue unless enjoined  
8 by this Court.

9 36. YETI has been, is being, and will continue to be injured and has  
10 suffered, is suffering, and will continue to suffer injury and damages for which it is  
11 entitled to relief under at least 35 U.S.C. §§ 281, 284, and 285.

12 37. Defendants also have caused, are causing, and will continue to cause  
13 irreparable harm to YETI for which there is no adequate remedy at law and for  
14 which YETI is entitled to injunctive relief under at least 35 U.S.C. § 283.

15 **Count II:**

16 **Patent Infringement of U.S. Patent No. 11,389,003 Under 35 U.S.C. § 271**

17 38. YETI realleges and incorporates the allegations set forth in paragraphs  
18 1 through 37 as though fully set forth herein.

19 39. MacSports and Tofasco have infringed and continue to infringe the  
20 ’003 Patent at least by using, selling, offering to sell, making, and/or importing into  
21 the United States their Heavy Duty Camp Chair, which includes each and every  
22 element of one or more claims of the ’003 Patent, either literally or through the  
23 doctrine of equivalents, including at least claim 20, and which is made by a process  
24 that includes each and every element of one or more claims of the ’003 Patent, either  
25 literally or through the doctrine of equivalents, including at least claim 11.

26 40. For example, claim 20 of the ’003 Patent recites “[a] folding chair”  
27 comprising “a front frame; a rear frame; a seat pan; a backrest; a pair of arm rests; a  
28 pair of vertical legs; and a rear tensioner; wherein the vertical legs are each provided

1 with an inner leg and an outer leg and the inner leg is configured to telescope out of  
2 the outer leg, wherein each of the vertical legs include a leg locking system for  
3 locking the outer leg to the inner leg when the chair is in an unfolded position,  
4 wherein the rear tensioner is configured to maintain the backrest in a tensioned  
5 position, the tensioner comprising a rear tensioner handle, and a pair of rear  
6 tensioner arms.”

7 41. MacSports’ and Tofasco’s Heavy Duty Camp Chair infringes at least  
8 claim 20 of the ’003 Patent because it is folding chair that includes all of the claim  
9 elements of at least claim 20, either literally or through the doctrine of equivalents,  
10 including “a front frame,” “a rear frame,” “a seat pan,” “a backrest,” “a pair of arm  
11 rests,” “a pair of vertical legs,” and “a rear tensioner,” “wherein the vertical legs are  
12 each provided with an inner leg and an outer leg and the inner leg is configured to  
13 telescope out of the outer leg,” “wherein each of the vertical legs include a leg  
14 locking system for locking the outer leg to the inner leg when the chair is in an  
15 unfolded position,” and “wherein the rear tensioner is configured to maintain the  
16 backrest in a tensioned position, the tensioner comprising a rear tensioner handle,  
17 and a pair of rear tensioner arms.”

18 42. For example, MacSports’ and Tofasco’s Heavy Duty Camp Chair is a  
19 folding chair that has a front frame, a rear frame, a seat pan, a backrest, a pair of arm  
20 rests, a pair of vertical legs, and a rear tensioner. Additionally, the vertical legs of  
21 the Heavy Duty Camp Chair are each provided with an inner leg and an outer leg  
22 and the inner leg is configured to telescope out of the outer leg. Each of the vertical  
23 legs also include a leg locking system for locking the outer leg to the inner leg when  
24 the chair is in an unfolded position. Additionally, the rear tensioner of the Heavy  
25 Duty Camp Chair is configured to maintain the backrest in a tensioned position and  
26 includes a rear tensioner handle and a pair of rear tensioner arms.

27 43. As another example, claim 11 of the ’003 Patent recites “[a] method of  
28 forming a folding chair” comprising “forming a seat pan comprising a pair of seat

1 bars, a pair of vertical legs configured to tension the seat pan, a locking system, a  
2 backrest comprising a pair of diagonally extending backrest bars, a front frame  
3 comprising a pair of cross bars, a rear frame comprising rear cross bars, and a pair of  
4 armrests; wherein the seat pan and the backrest are formed of a suspension fabric  
5 having an overlap and a core placed into a hollow section created by the overlap,  
6 wherein the core in the hollow section is secured in a notch asymmetrically located  
7 in a top portion of the pair of diagonally extending backrest bars, wherein the  
8 vertical legs further comprise an inner leg and an outer leg, wherein the inner leg is  
9 configured to telescope out of the outer leg, and wherein each of the vertical legs  
10 include the leg locking system configured to lock the outer leg to the inner leg when  
11 the chair is in an unfolded position.”

12 44. MacSports and Tofasco also infringe at least claim 11 of the ‘003  
13 Patent. Defendants’ Heavy Duty Camp Chair is a folding chair that includes all of  
14 the claim elements of at least claim 11, either literally or through the doctrine of  
15 equivalents, including “a seat pan comprising a pair of seat bars,” “a pair of vertical  
16 legs configured to tension the seat pan,” “a locking system,” “a backrest comprising  
17 a pair of diagonally extending backrest bars,” “a front frame comprising a pair of  
18 cross bars,” “a rear frame comprising rear cross bars,” and “a pair of armrests,”  
19 “wherein the seat pan and the backrest are formed of a suspension fabric having an  
20 overlap and a core placed into a hollow section created by the overlap,” “wherein  
21 the core in the hollow section is secured in a notch asymmetrically located in a top  
22 portion of the pair of diagonally extending backrest bars,” “wherein the vertical legs  
23 further comprise an inner leg and an outer leg,” “wherein the inner leg is configured  
24 to telescope out of the outer leg,” and “wherein each of the vertical legs include the  
25 leg locking system configured to lock the outer leg to the inner leg when the chair is  
26 in an unfolded position” and, on information and belief, Defendants’ Heavy Duty  
27 Camp Chair is made by a “method ... comprising:” “forming a seat pan comprising  
28 a pair of seat bars, a pair of vertical legs configured to tension the seat pan, a locking

1 system, a backrest comprising a pair of diagonally extending backrest bars, a front  
2 frame comprising a pair of cross bars, a rear frame comprising rear cross bars, and a  
3 pair of armrests; wherein the seat pan and the backrest are formed of a suspension  
4 fabric having an overlap and a core placed into a hollow section created by the  
5 overlap, wherein the core in the hollow section is secured in a notch asymmetrically  
6 located in a top portion of the pair of diagonally extending backrest bars, wherein  
7 the vertical legs further comprise an inner leg and an outer leg, wherein the inner leg  
8 is configured to telescope out of the outer leg, and wherein each of the vertical legs  
9 include the leg locking system configured to lock the outer leg to the inner leg when  
10 the chair is in an unfolded position.”

11 45. For example, MacSports’ and Tofasco’s Heavy Duty Camp Chair is a  
12 folding chair that has a seat pan comprising a pair of seat bars, a pair of vertical legs  
13 configured to tension the seat pan, a locking system, a backrest comprising a pair of  
14 diagonally extending backrest bars, a front frame comprising a pair of cross bars, a  
15 rear frame comprising rear cross bars, and a pair of armrests. Moreover, the seat pan  
16 and the backrest of Defendants’ Heavy Duty Camp Chair are formed of a  
17 suspension fabric having an overlap and a core placed into a hollow section created  
18 by the overlap. Additionally, the core in the hollow section is secured in a notch  
19 asymmetrically located in a top portion of the pair of diagonally extending backrest  
20 bars. The vertical legs of Defendants’ Heavy Duty Camp Chair also have an inner  
21 leg and an outer leg, wherein the inner leg is configured to telescope out of the outer  
22 leg, and wherein each of the vertical legs include the leg locking system configured  
23 to lock the outer leg to the inner leg when the chair is in an unfolded position.

24 46. MacSports’ and Tofasco’s acts of infringement have been without  
25 express or implied license by YETI, are in violation of YETI’s rights, and will  
26 continue unless enjoined by this Court.

27  
28



1 47. YETI has been, is being, and will continue to be injured and has  
2 suffered, is suffering, and will continue to suffer injury and damages for which it is  
3 entitled to relief under at least 35 U.S.C. §§ 281, 284, and 285.

4 48. Defendants also have caused, are causing, and will continue to cause  
5 irreparable harm to YETI for which there is no adequate remedy at law and for  
6 which YETI is entitled to injunctive relief under at least 35 U.S.C. § 283.

7 **Count III:**

8 **Patent Infringement of U.S. Patent No. D941,600 Under 35 U.S.C. § 271**

9 49. YETI realleges and incorporates the allegations set forth in paragraphs  
10 1 through 48 as though fully set forth herein.

11 50. MacSports and Tofasco have infringed and continue to infringe the  
12 '600 Patent at least by using, selling, offering to sell, making, and/or importing into  
13 the United States their Heavy Duty Camp Chair, which is covered by the claim of  
14 the '600 Patent.

15 51. MacSports' and Tofasco's Heavy Duty Camp Chair infringes the '600  
16 Patent because the overall appearance of their Heavy Duty Camp Chair is  
17 substantially the same as the overall appearance of the design of the '600 Patent, and  
18 an ordinary observer would perceive the overall appearance of their Heavy Duty  
19 Camp Chair to be substantially the same as the overall appearance of the design of  
20 the '600 Patent.

21 52. MacSports' and Tofasco's acts of infringement have been without  
22 express or implied license by YETI, are in violation of YETI's rights, and will  
23 continue unless enjoined by this Court.

24 53. YETI has been, is being, and will continue to be injured and has  
25 suffered, is suffering, and will continue to suffer injury and damages for which it is  
26 entitled to relief under at least 35 U.S.C. §§ 281, 284, 285, and 289.

27  
28



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**Count V:**

**Patent Infringement of U.S. Patent No. D1,027,523 Under 35 U.S.C. § 271**

61. YETI realleges and incorporates the allegations set forth in paragraphs 1 through 60 as though fully set forth herein.

62. MacSports and Tofasco have infringed and continue to infringe the '523 Patent at least by using, selling, offering to sell, making, and/or importing into the United States their Heavy Duty Camp Chair, which is covered by the claim of the '523 Patent.

63. MacSports' and Tofasco's Heavy Duty Camp Chair infringes the '523 Patent because the overall appearance of their Heavy Duty Camp Chair is substantially the same as the overall appearance of the design of the '523 Patent, and an ordinary observer would perceive the overall appearance of their Heavy Duty Camp Chair to be substantially the same as the overall appearance of the design of the '523 Patent.

64. MacSports' and Tofasco's acts of infringement have been without express or implied license by YETI, are in violation of YETI's rights, and will continue unless enjoined by this Court.

65. YETI has been, is being, and will continue to be injured and has suffered, is suffering, and will continue to suffer injury and damages for which it is entitled to relief under at least 35 U.S.C. §§ 281, 284, 285, and 289.

66. Defendants also have caused, are causing, and will continue to cause irreparable harm to YETI for which there is no adequate remedy at law and for which YETI is entitled to injunctive relief under at least 35 U.S.C. § 283.

**Count VI:**

**Patent Infringement of U.S. Patent No. D1,030,340 Under 35 U.S.C. § 271**

67. YETI realleges and incorporates the allegations set forth in paragraphs 1 through 66 as though fully set forth herein.

1 68. MacSports and Tofasco have infringed and continue to infringe the  
2 '340 Patent at least by using, selling, offering to sell, making, and/or importing into  
3 the United States their Heavy Duty Camp Chair, which is covered by the claim of  
4 the '340 Patent.

5 69. MacSports' and Tofasco's Heavy Duty Camp Chair infringes the '340  
6 Patent because the overall appearance of their Heavy Duty Camp Chair is  
7 substantially the same as the overall appearance of the design of the '340 Patent, and  
8 an ordinary observer would perceive the overall appearance of their Heavy Duty  
9 Camp Chair to be substantially the same as the overall appearance of the design of  
10 the '340 Patent.

11 70. MacSports' and Tofasco's acts of infringement have been without  
12 express or implied license by YETI, are in violation of YETI's rights, and will  
13 continue unless enjoined by this Court.

14 71. YETI has been, is being, and will continue to be injured and has  
15 suffered, is suffering, and will continue to suffer injury and damages for which it is  
16 entitled to relief under at least 35 U.S.C. §§ 281, 284, 285, and 289.

17 72. Defendants also have caused, are causing, and will continue to cause  
18 irreparable harm to YETI for which there is no adequate remedy at law and for  
19 which YETI is entitled to injunctive relief under at least 35 U.S.C. § 283.

20 **Demand for Jury Trial**

21 YETI hereby demands a jury trial on all issues so triable.

22 **Prayer for Relief**

23 WHEREFORE, Plaintiff YETI respectfully prays for:

24 1. Judgment that Defendants have (i) infringed the '219 Patent in  
25 violation of § 271 of Title 35 of the United States Code; (ii) infringed the '003  
26 Patent in violation of § 271 of Title 35 of the United States Code; (iii) infringed the  
27 '600 Patent in violation of § 271 of Title 35 of the United States Code; (iv) infringed  
28 the '132 Patent in violation of § 271 of Title 35 of the United States Code; (v)

1 infringed the '523 Patent in violation of § 271 of Title 35 of the United States Code;  
2 and (vi) infringed the '340 Patent in violation of § 271 of Title 35 of the United  
3 States Code;

4 2. An injunction against further infringement of YETI's patents by  
5 Defendants, and each of their agents, employees, servants, attorneys, successors and  
6 assigns, and all others in privity or acting in concert with any of them, pursuant to at  
7 least 35 U.S.C. § 283;

8 3. An Order directing Defendants to recall all infringing products sold  
9 and/or distributed and provide a full refund for all recalled infringing products;

10 4. An award of damages adequate to compensate YETI for Defendants'  
11 patent infringements pursuant at least to 35 U.S.C. § 284, and an award for  
12 Defendants' profits from its patent infringements pursuant at least to 35 U.S.C. §  
13 289, together with prejudgment interest and costs and reasonable attorney fees,  
14 pursuant at least to 35 U.S.C. §§ 284 and 285; and

15 5. Such other and further relief as this Court deems just and proper.  
16  
17

18 DATED: August 9, 2024

By: /s/ Jason de Bretteville

19 STRADLING YOCCA CARLSON & RAUTH  
20 LLP

Jason De Bretteville

21 BANNER & WITCOFF, LTD.

22 Michael L. Krashin (*pro hac vice* forthcoming)

23 Victoria R. M. Webb (*pro hac vice* forthcoming)

24 Kimberly S. Devine (*pro hac vice* forthcoming)

25 *Attorneys for Plaintiff*

26 *YETI COOLERS, LLC*  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**JURY DEMAND**

Plaintiff YETI COOLERS, LLC hereby demands a trial by a jury on all issues herein so triable.

DATED: August 9, 2024

By: /s/ Jason de Bretteville  
STRADLING YOCCA CARLSON &  
RAUTH LLP  
Jason De Bretteville

BANNER & WITCOFF, LTD.  
Michael L. Krashin (*pro hac vice*  
forthcoming)  
Victoria R. M. Webb (*pro hac vice*  
forthcoming)  
Kimberly S. Devine (*pro hac vice*  
forthcoming)

*Attorneys for Plaintiff*  
**YETI COOLERS, LLC**