

Pt # 8,136,282

UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA

EXPAND INTERNATIONAL AB,	)	CASE NO.:
a Swedish Corporation	)	
	)	<b>COMPLAINT</b>
Plaintiff,	)	
	)	
v.	)	
	)	
TEX VISIONS, LLC,	)	
a Pennsylvania Limited Liability Company	)	
	)	
Defendant.	)	
	)	
	)	

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Plaintiff Expand International AB (“Expand), claims relief against Defendant Tex Visions, LLC (“Tex Visions”), as follows:

**Jurisdiction and Venue**

1. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction under 28 U.S.C. §1331 and §1338(a).

2. Venue is proper in this judicial district under 28 U.S.C. §1391 and §1400(b).

### **Parties**

3. Plaintiff Expand is incorporated in Sweden, and has a principal place of business at Palmfeltsvagen 1C, SE-121 62 Johanneshov, Sweden.

4. Defendant Tex Visions is organized and existing under the laws of Pennsylvania.

### **Patent Infringement**

5. On March 20, 2012, United States Letters Patent No. 8,136,282 (“the ’282 patent”) issued to the plaintiff for an invention in a display apparatus. The plaintiff owned the patent throughout the period of the defendant’s infringing acts and still owns the patent. A copy of the ’282 Patent is attached hereto as Exhibit 1.

6. On information and belief, Tex Visions has infringed and continues to infringe the ’282 Patent under 35 U.S.C. § 271 by, at least, making, using, selling, importing, offering for sale and/or using within this judicial district and elsewhere in the United States without authority or license, products covered by the ’282 Patent, and in particular, a display apparatus that embody each element of at least one of the claims of the ’282 Patent. These infringing products include, but may not be limited to, a display apparatus marketed as Tex Visions’ Roll Up Outdoor DS.

7. More specifically, at least the display apparatus identified above infringes at least Claim 1 of the '282 Patent because, on information and belief, each model has, literally and/or by equivalents, each of the elements defined in the claim.

8. The plaintiff has given the defendant written notice of the infringement, and, on information and belief, Tex Visions has actual knowledge of the '282 Patent.

9. Tex Visions' infringement of the '282 Patent has been and continues to be willful and deliberate.

10. This is an exceptional case within the meaning of 35 U.S.C. § 285 meriting an award of attorneys' fees.

11. This is an exceptional case meriting an award of treble damages under 35 U.S.C. § 284.

12. Expand has been and continues to be irreparably damaged by Tex Visions' acts of infringement, and will continue to be damaged unless such acts are enjoined from further infringement.

**Prayer for Relief**

WHEREFORE, Expand prays for judgment in its favor and against Tex Visions as follows:

1. That Tex Visions has infringed Expand's '282 Patent under 35 U.S.C. § 271;
2. That Tex Visions' infringement has been deliberate and willful;
3. That Tex Visions, their officers, agents, employees, privies, successors, and assigns, and those acting for or on their behalf, in accordance with 35 U.S.C. § 283, be preliminarily and permanently enjoined from further infringement of Expand's '282 Patent;
4. That Tex Visions account and pay to Expand all damages caused to Expand by their patent infringement, and in accordance with 35 U.S.C. § 284, that such damages be trebled in view of the deliberate and willful nature of this patent infringement;
5. That Expand be granted its reasonable attorneys' fees, in accordance with 35 U.S.C. § 285, in view of the willful and deliberate infringement of Expand's '282 Patent;
6. That Expand recover prejudgment and post-judgment interest at the highest statutory rate on its damages, costs, and attorneys' fees, and

7. That Expand be granted such other and further relief as this Court deems just and proper.

**Jury Demand**

Plaintiffs demand a trial by jury on all of their claims so triable.

Dated this 19 day of December, 2012.

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(*pro hac vice motions to be filed*)

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