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7 UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 NATIONAL PRODUCTS, INC.,

10 Plaintiff,

11 v.

12 GAMBER-JOHNSON LLC,

13 Defendants.  
14

Case No. 2:15-cv-1571

**COMPLAINT**

**JURY TRIAL DEMANDED**

15 For its Complaint, Plaintiff National Products, Inc. (“NPI”) states and alleges as  
16 follows:

17 **The Parties**

18 1. NPI is a corporation organized and existing under the laws of the State of  
19 Washington, having its principal place of business at 8410 Dallas Ave S., Seattle, Washington  
20 98109.

21 2. NPI is a market leader in the design, manufacture, and sale of innovative  
22 vehicle mounting systems, including docking stations for computers and other electronic  
23 devices used in, for example, commercial fleets and law enforcement vehicles.

24 3. Upon information and belief, Defendant Gamber-Johnson LLC (“Gamber-  
25 Johnson”) is a limited liability company organized and existing under the laws of the State of  
26 Wisconsin, having its principal place of business at 3001 Borham Avenue, Stevens Point,

1 Wisconsin 54481.

2 4. Upon information and belief, Gamber-Johnson is a manufacturer and  
3 distributor of computer mounting systems and vehicle mounting components. Gamber-  
4 Johnson advertises, markets, and sells its products to the public throughout the United States,  
5 including within this judicial district. Upon information and belief, Gamber-Johnson has  
6 advertised and sold the products that are the subject of the patent infringement alleged in this  
7 lawsuit in this judicial district.

8 **Jurisdiction and Venue**

9 5. This is an action for patent infringement arising under the Acts of Congress  
10 relating to patents, 35 U.S.C. §§ 271, 281-285.

11 6. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and  
12 1338(a).

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

14 **The '343 patent**

15 8. NPI is the owner of all right, title, and interest in U.S. Patent No. 9,036,343  
16 (“the ’343 patent”), entitled “Portable Device Docking Station,” which issued on May 19,  
17 2015. A copy of the ’343 patent is attached as Exhibit A. The ’343 patent is generally  
18 directed towards a molded docking station for a portable electronic device, such as a portable  
19 computer.

20 **Count I – Patent Infringement**

21 9. NPI realleges and reincorporates the allegations in paragraphs 1-8 above.

22 10. Gamber-Johnson has been, is currently, and will continue to infringe one or  
23 more claims of the ’343 patent, directly, contributorily, and/or by inducement, by making,  
24 using, offering to sell, and selling within the United States and/or importing into the United  
25 States products that infringe the ’343 patent, including without limitation all Toughbook 30/31  
26 Docking Stations (model nos. 7160-0318-00, -01, -02, -04, -05, and -06), and certain

1 accessories thereto, including in this judicial district.

2 11. As a direct and proximate consequence of Gamber-Johnson's infringement of  
3 the '343 patent, NPI has suffered irreparable harm, and NPI will continue to suffer irreparable  
4 harm in the future unless Gamber-Johnson is enjoined from infringing the '343 patent.

5 12. Upon information and belief, the continued infringement by Gamber-Johnson  
6 of the '343 patent is willful.

7 **Prayer For Relief**

8 WHEREFORE, NPI prays for the following relief:

- 9 a. A judgment that Gamber-Johnson has infringed the '343 patent;
- 10 b. An order preliminarily and permanently enjoining and restraining Gamber-  
11 Johnson, its officers, directors, agents, servants, employees, licensees, attorneys, and all other  
12 persons acting under or through it, directly or indirectly, from infringing the '343 patent;
- 13 c. A judgment and order requiring that Gamber-Johnson pay damages under 35  
14 U.S.C. § 284, with prejudgment interest;
- 15 d. A judgment and order directing Gamber-Johnson to pay the costs of this action  
16 (including all disbursements and attorney fees as provided by 35 U.S.C. § 285, with  
17 prejudgment interest;
- 18 e. Such other and further relief as the Court may deem just and equitable.

19 **Demand For Jury Trial**

20 NPI hereby demands a trial by jury of all issues so triable.

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1 NATIONAL PRODUCTS, INC.

2 By its attorneys,

3 Dated: October 1, 2015

FENWICK & WEST LLP

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