

Tony W. Wong (CA State Bar No. 243324)
A. Justin Lum, *Of Counsel* (CA State Bar No. 164882)
Peter K. Chu (CA State Bar No. 251705)
DAVID AND RAYMOND IP LAW FIRM
388 E. Valley Blvd., Suite 223
Alhambra, CA 91801
Telephone: (626) 447-7788
Facsimile: (626) 447-7783
Email: tonyw@dnriplaw.com
justinl@dnriplaw.com
peterc@dnriplaw.com

Attorneys for Plaintiffs
WP BANQUET, LLC and
WOK & PAN IND., INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

WP BANQUET, LLC, a California
limited liability company; and WOK
& PAN IND., INC., a China
Corporation,

Plaintiffs,

v.

TARGET CORPORATION, a
Minnesota Corporation; PLASTIC
DEVELOPMENT GROUP, LLC, a
Michigan Limited Liability
Company; and DOES 1 through 20,
inclusive,

Defendants.

Case No. 16-CV-02082

**(1) COMPLAINT FOR
PATENT INFRINGEMENT
[35 U.S.C. § 271 *et seq.*]**

(2) DEMAND FOR JURY TRIAL

1 For their Complaint against Defendants TARGET CORPORATION, PLASTIC
2 DEVELOPMENT GROUP, LLC, and DOES 1 through 20, inclusive (collectively,
3 “Defendants”), Plaintiffs WP BANQUET, LLC and WOK & PAN IND., INC.
4 (collectively, “Plaintiffs”) state the following:
5

6
7 **I.**

8 **THE PARTIES**

9 1. WP Banquet, LLC is a California limited liability company with its
10 principal place of business at 605 S. Milliken Ave., Suite #A, Ontario, California 91761.
11

12 2. Wok & Pan Ind., Inc. is a China corporation with its principal place of
13 business at Tangja Village, Gonming Town, Bao’an Dist., Shenzhen City, Guangdong,
14 China, 518132.
15

16 3. Plaintiffs are informed and believe, and thereupon allege, that Defendant
17 TARGET CORPORATION (“Target”) is a Minnesota corporation with a principal place
18 of business at 1000 Nicollet Mall, Minneapolis, Minnesota 55403.
19

20 4. Plaintiffs are informed and believe, and thereupon allege, that Defendant
21 PLASTIC DEVELOPMENT GROUP, LLC (“PDG”) is a Michigan limited liability
22 company with a principal place of business at 24445 Northwestern Hwy, #101,
23 Southfield, Michigan 48075.
24

25 5. Plaintiffs have sued defendants DOES 1 through 20, by such fictitious
26 names because Plaintiffs are uncertain as to the names, identities, legal responsibilities
27 and/or capacities of the Doe defendants, and each of them. Plaintiffs are informed and
28

1 believe and thereupon allege that each of the defendants designated herein as Doe
2 defendants was and is responsible in some actionable manner for the events and
3 incidents described in this complaint. Plaintiffs will seek leave of court to amend this
4 pleading when the true names, identities and capacities of said Doe defendants have
5 been ascertained by Plaintiffs.
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7

8 6. All allegations in this complaint referencing defendants shall be deemed to
9 mean acts of defendants acting individually, jointly, severally, or any combination of
10 them.
11

12 7. Unless specifically stated otherwise, the acts complained of herein were
13 committed by, on behalf of, and/or for the benefit of Defendants.
14

15 8. Upon information and belief, Defendants have substantial contacts and
16 transact substantial business, either directly or through their agents, on an ongoing basis
17 in this judicial district and elsewhere in the United States.
18

19 II.

20 NATURE OF THE ACTION

21 9. This is an action for patent infringement.

22
23 10. Plaintiffs are informed and believe, and thereupon allege, that Defendants
24 have been and are infringing, contributing to the infringement of, and/or actively
25 inducing others to infringe claims of U.S. Patent No. 5,957,061 ("the '061 Patent"), U.S.
26 Patent No. 8,881,661 B2 ("the '661 Patent"), U.S Patent No. 8,931,421 B2 ("the '421
27 Patent"), and U.S. Patent No. 9,089,204 B2 ("the '204 Patent") (hereinafter, collectively,
28

COMPLAINT

1 “the Asserted Patents”).

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3 **III.**

4 **JURISDICTION AND VENUE**

5 11. This action arises under the patent laws of the United States, 35 U.S.C. § 1
6 *et seq.* This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and
7
8 1338(a).

9 12. This Court has personal jurisdiction over Defendants because they have
10 substantial contacts and conduct substantial business in the state of California, in this
11 judicial district and have been infringing, contributing to the infringement of, and/or
12 actively inducing others to infringe the Asserted Patents in this District and elsewhere.

13
14 13. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 (a) (b) and (c)
15 and /or 1400 (b) because a substantial part of the events giving rise to Plaintiffs’ claims
16 occurred in the Central District of California and because Defendants are subject to
17 personal jurisdiction in the Central District of California.
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19

20 **IV.**

21 **FACTUAL BACKGROUND**

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23 14. The Asserted Patents relate to technology used in foldable tables that
24 provide flexibility and portability. Based on the patented technology, Plaintiffs have
25 designed, and developed products that it markets and sells worldwide. Plaintiffs have
26 relied on and invested in the patented technology in order to grow their markets and their
27 business, and have relied on the United States Patent system to protect both the
28

1 technology and the business that have resulted from their investments.

2
3 15. On September 28, 1999, U.S. Patent No 5,957,061 titled “Banquet Table”
4 was issued to Mei-Fang Chang, providing a banquet table “including a table surface,
5 upper frames fixedly installed on the bottom side of the table surface, and leg frames
6 which are rotatably connected to the upper frames so as to allow the leg frames to be
7 folded inward and toward the bottom side of the table surface. The table surface can also
8 be formed by two sections for folding. The two-section banquet table also includes a pair
9 of hinges for connecting the upper frames on each table section. The hinges are designed
10 to include two facing pressure resisting sections so that when the table is extended, the
11 pressure of the table is applied on the pressure resisting sections, instead of the
12 connecting pin shafts.” A true and correct copy of the '061 patent is attached as Exhibit
13 “A” and incorporated herein by reference.
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17 16. On November 11, 2014, U.S. Patent No. 8,881,661 B2 titled “Foldable
18 Table” was issued to Ping-Cheng Tsai. This patent discloses a foldable table that
19 "includes a first tabletop panel, a second tabletop panel, and a reinforcing frame which
20 includes first through fourth reinforcing members mounted along longitudinal sides of
21 the first and second tabletop panels respectively, a first transverse member transversely
22 extended between outer end portions of the first and second reinforcing members at the
23 first tabletop panel, and a second transverse member transversely extended between
24 outer end portions of the third and fourth reinforcing members at the second tabletop
25 panel. Two ends of the first transverse member are affixed to the first and second
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1 reinforcing members in a non-rotatably movable manner. Two ends of the second
2 transverse member are affixed to the third and fourth reinforcing members in a non-
3 rotatably movable manner. Therefore, the first and second transverse members enhance
4 the rigidity of the reinforcement frame to support two transverse sides of the first and
5 second tabletop panels respectively." A true and correct copy of the '661 Patent is
6 attached as Exhibit "B" and incorporated herein by reference.
7

9 17. On January 13, 2015, U.S. Patent No. 8,931,421 B2 titled "Foldable Table"
10 was issued to Ping-Cheng Tsai. This patent discloses a foldable table that "includes a
11 first tabletop panel, a second tabletop panel, and a reinforcing frame which includes first
12 through fourth reinforcing members mounted along longitudinal sides of the first and
13 second tabletop panels respectively, a first transverse member transversely extended
14 between outer end portions of the first and second reinforcing members at the first
15 tabletop panel, and a second transverse member transversely extended between outer end
16 portions of the third and fourth reinforcing members at the second tabletop panel. Two
17 ends of the first transverse member are affixed to the first and second reinforcing
18 members in a non-rotatably movable manner. Two ends of the second transverse
19 member are affixed to the third and fourth reinforcing members in a non-rotatably
20 movable manner. Therefore, the first and second transverse members enhance the
21 rigidity of the reinforcement frame to support two transverse sides of the first and second
22 tabletop panels respectively." A true and correct copy of the '421 Patent is attached as
23 Exhibit "C" and incorporated herein by reference.
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1 18. On July 28, 2015, U.S. Patent No. 9,089,204 B2 titled "Foldable Table"
2 was issued to Ping-Cheng Tsai. This patent discloses a foldable table that "includes a
3 first tabletop panel, a second tabletop panel, and a reinforcing frame which includes first
4 through fourth reinforcing members mounted along longitudinal sides of the first and
5 second tabletop panels respectively, a first transverse member transversely extended
6 between outer end portions of the first and second reinforcing members at the first
7 tabletop panel, and a second transverse member transversely extended between outer end
8 portions of the third and fourth reinforcing members at the second tabletop panel. Two
9 ends of the first transverse member are affixed to the first and second reinforcing
10 members in a non-rotatably movable manner. Two ends of the second transverse
11 member are affixed to the third and fourth reinforcing members in a non-rotatably
12 movable manner. Therefore, the first and second transverse members enhance the
13 rigidity of the reinforcement frame to support two transverse sides of the first and second
14 tabletop panels respectively." A true and correct copy of the '204 Patent is attached as
15 Exhibit "D" and incorporated herein by reference.

16 19. At all relevant times, the rights in the Asserted Patents have been owned
17 by their inventors and assigned to Plaintiff Wok & Pan Ind., Inc. Plaintiff WP Banquet,
18 LLC is an exclusive licensee of the Asserted Patents with right to bring suit to protect its
19 licensed rights in the Asserted Patents.

20 20. Plaintiffs are informed and believe that Defendants have provided products
21 which infringe the Asserted Patents to the market under various names, including but not

1 limited to, the “Lifestyles 4’ Bi-Fold Table” and the “Lifestyles 6’ Bi-Fold Table”
2 (collectively, “the Target Products”).
3

4 21. Attached as Exhibit “E” are true and correct copies of photographs of each
5 of the Target Products.
6

7 **V.**

8 **CLAIMS FOR RELIEF**

9 **COUNT 1**

10 **(Infringement of U.S. Patent No. 5,957,061 ('061 Patent)**

11 **Under 35 U.S.C. § 271 *et seq.*)**

12
13 22. Plaintiffs incorporate by reference and reallege paragraphs 1 through 21
14 above as though fully restated here.
15

16 23. Plaintiffs are informed and believe, and thereupon allege, that Defendants
17 and each of them have infringed, directly and indirectly through contributory and/or
18 induced infringement, the ‘061 Patent through their production and sale of products
19 using the technology that is proprietary to Plaintiffs under the ‘061 Patent.
20

21 24. Plaintiffs are informed and believe, and thereupon allege, that Defendants
22 have provided products which infringe the ‘061 Patent to the market under various
23 names, including the Target Products.
24

25 25. Plaintiffs are informed and believe, and thereupon allege, that Defendants
26 make their infringing products available through various marketing channels, including
27 distribution networks that conduct direct sales through stores, and Internet sales.
28

COMPLAINT

1 26. Defendants' acts of marketing products which infringe the '061 Patent
2 directly and in connection with customers and other parties constitute direct and
3 contributory and/or induced infringement of the '061 Patent. Defendants have not only
4 violated the proprietary rights of Plaintiffs but, upon information and belief, have
5 encouraged and induced others to do so, through their marketing channels and sales
6 networks and the continued sale of products which infringe the '061 Patent through
7 Defendants' direct and third party marketing channels.
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10 27. Defendants are liable for infringement by designing their infringing
11 products in a manner that infringes Plaintiffs' proprietary technology under the '061
12 Patent and further liable for contributory and induced infringement by encouraging
13 others to market, sell and use products which infringe the '061 Patent.
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16 28. Defendants and each of them have infringed and continue to infringe the
17 claims of the '061 Patent literally or under the doctrine of equivalents by making, using,
18 offering for sale and selling (directly and through intermediaries or third parties) products
19 which infringe the '061 Patent, in this District and elsewhere in the United States.
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21 29. Plaintiffs are informed and believe, and thereupon allege, that Defendants
22 and each of them have contributed and continue to contribute to the literal infringement
23 and/or infringement under the doctrine of equivalents of the claims of the '061 Patent, and
24 have actively induced and continue to actively induce others to infringe the claims of the
25 '061 Patent, literally and under the doctrine of equivalents in this District and elsewhere
26 in the United States.
27
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30. Plaintiffs are entitled to recover from Defendants and each of them the actual damages they have sustained as a direct and proximate result of Defendants' wrongful acts as alleged herein, in an amount to be proven at trial under 35 U.S.C. § 284.

31. Plaintiffs are informed and believe, and thereupon allege, that Defendants' infringement has been and continues to be willful and deliberate, in disregard for Plaintiffs' patent rights, and that Plaintiffs are thereby entitled to increased damages up to three times the amount of actual damages and attorney's fees, pursuant to 35 U.S.C. §§ 284 and 285.

32. Defendants' continued infringement of the '061 Patent will continue to damage Plaintiffs in a manner that is causing irreparable harm for which there is no adequate remedy at law unless it is enjoined by this Court; therefore, Plaintiffs are entitled to an injunction against Defendants' continuing infringement of the '061 Patent.

COUNT 2

(Infringement of U.S. Patent No. 8,881,661 ('661 Patent))

Under 35 U.S.C. § 271 *et seq.*)

33. Plaintiffs incorporate by reference and reallege paragraphs 1 through 32 above as though fully restated here.

34. Plaintiffs are informed and believe that Defendants and each of them have infringed, directly and indirectly through contributory and/or induced infringement, the '661 Patent through their production and sale of products using the technology that is proprietary to Plaintiffs under the '661 Patent.

1 35. Plaintiffs are informed and believe, and thereupon allege, that Defendants
2 have provided products which infringe the '661 Patent to the market under various
3 names, including the Target Products.
4

5 36. Plaintiffs are informed and believe, and thereupon allege, that Defendants
6 make their infringing products available through various marketing channels, including
7 distribution networks that conduct direct sales through stores, and Internet sales.
8

9 37. Defendants' acts of marketing products which infringe the '661 Patent
10 directly and in connection with customers and other parties constitute direct and
11 contributory and/or induced infringement of the '661 Patent. Defendants have not only
12 violated the proprietary rights of Plaintiffs but, upon information and belief, have
13 encouraged and induced others to do so, through their marketing channels and sales
14 networks and the continued sale of products which infringe the '661 Patent through
15 Defendants' direct and third party marketing channels.
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18 38. Defendants are liable for infringement by designing their infringing
19 products in a manner that infringes Plaintiffs' proprietary technology under the '661
20 Patent and further liable for contributory and induced infringement by encouraging others
21 to market, sell and use products which infringe the '661 Patent.
22
23

24 39. Defendants and each of them have infringed and continue to infringe the
25 claims of the '661 Patent literally or under the doctrine of equivalents by making, using,
26 offering for sale and selling (directly and through intermediaries or third parties) products
27 which infringe the '661 Patent, in this District and elsewhere in the United States.
28

1 40. Plaintiffs are informed and believe, and thereupon allege, that Defendants
2 and each of them have contributed and continue to contribute to the literal infringement
3 and/or infringement under the doctrine of equivalents of the claims of the '661 Patent, and
4 have actively induced and continue to actively induce others to infringe the claims of the
5 '661 Patent, literally and under the doctrine of equivalents in this District and elsewhere in
6 the United States.
7

8
9 41. Plaintiffs are entitled to recover from Defendants and each of them the actual
10 damages they have sustained as a direct and proximate result of Defendants' wrongful acts
11 as alleged herein, in an amount to be proven at trial under 35 U.S.C. § 284.
12

13 42. Plaintiffs are informed and believe and thereupon allege that Defendants'
14 infringement has been and continues to be willful and deliberate, in disregard for
15 Plaintiffs' patent rights, and that Plaintiffs are thereby entitled to increased damages up to
16 three times the amount of actual damages and attorney's fees, pursuant to 35 U.S.C. §§
17 284 and 285.
18

19
20 43. Defendants' continued infringement of the '661 Patent will continue to
21 damage Plaintiffs in a manner that is causing irreparable harm for which there is no
22 adequate remedy at law unless it is enjoined by this Court; therefore, Plaintiffs are
23 entitled to an injunction against Defendants' continuing infringement of the '661 Patent.
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COUNT 3

(Infringement of U.S. Patent No. 8,931,421 ('421 Patent)

Under 35 U.S.C. § 271 *et seq.*)

44. Plaintiffs incorporate by reference and reallege paragraphs 1 through 43 above as though fully restated here.

45. Plaintiffs are informed and believe, and thereupon allege, that Defendants and each of them have infringed, directly and indirectly through contributory and/or induced infringement, the '421 Patent through their production and sale of products using the technology that is proprietary to Plaintiffs under the '421 Patent.

46. Plaintiffs are informed and believe, and thereupon allege, that Defendants have provided products which infringe the '421 Patent to the market under various names, including the Target Products.

47. Plaintiffs are informed and believe, and thereupon allege, that Defendants make their infringing products available through various marketing channels, including distribution networks that conduct direct sales through stores, and Internet sales.

48. Defendants' acts of marketing products which infringe the '421 Patent directly and in connection with customers and other parties constitute direct and contributory and/or induced infringement of the '421 Patent. Defendants have not only violated the proprietary rights of Plaintiffs but, upon information and belief, have encouraged and induced others to do so, through their marketing channels and sales networks and the continued sale of products which infringe the '421 Patent through

1 Defendants' direct and third party marketing channels.

2
3 49. Defendants are liable for infringement by designing their infringing
4 products in a manner that infringes Plaintiffs' proprietary technology under the '421
5 Patent and further liable for contributory and induced infringement by encouraging others
6 to market, sell and use products which infringe the '421 Patent.
7

8 50. Defendants and each of them have infringed and continue to infringe the
9 claims of the '421 Patent literally or under the doctrine of equivalents by making, using,
10 offering for sale and selling (directly and through intermediaries or third parties) products
11 which infringe the '421 Patent, in this District and elsewhere in the United States.
12

13 51. Plaintiffs are informed and believe, and thereupon allege, that Defendants
14 and each of them have contributed and continue to contribute to the literal infringement
15 and/or infringement under the doctrine of equivalents of the claims of the '421 Patent and
16 have actively induced and continue to actively induce others to infringe the claims of the
17 '421 Patent, literally and under the doctrine of equivalents in this District and elsewhere in
18 the United States.
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21 52. Plaintiffs are entitled to recover from Defendants and each of them the actual
22 damages they have sustained as a direct and proximate result of Defendants' wrongful acts
23 as alleged herein, in an amount to be proven at trial under 35 U.S.C. § 284.
24

25 53. Plaintiffs are informed and believe, and thereupon allege, that Defendants'
26 infringement has been and continues to be willful and deliberate, in disregard for
27 Plaintiffs' patent rights, and that Plaintiffs are thereby entitled to increased damages up to
28

1 three times the amount of actual damages and attorney's fees, pursuant to 35 U.S.C. §§
2 284 and 285.

3
4 54. Defendants' continued infringement of the '421 Patent will continue to
5 damage Plaintiffs in a manner that is causing irreparable harm for which there is no
6 adequate remedy at law unless it is enjoined by this Court; therefore, Plaintiffs are
7 entitled to an injunction against Defendants' continuing infringement of the '421 Patent.
8

9
10 **COUNT 4**

11 **(Infringement of U.S. Patent No. 9,089,204 ('204 Patent)**

12 **Under 35 U.S.C. § 271 *et seq.*)**

13 55. Plaintiffs incorporate by reference and reallege paragraphs 1 through 54
14 above as though fully restated here.
15

16 56. Plaintiffs are informed and believe, and thereupon allege, that Defendants
17 and each of them have infringed, directly and indirectly through contributory and/or
18 induced infringement, the '204 Patent through their production and sale of products using
19 the technology that is proprietary to Plaintiffs under the '204 Patent.
20

21 57. Plaintiffs are informed and believe, and thereupon allege, that Defendants
22 have provided products which infringe the '204 Patent to the market under various
23 names, including the Target Products.
24

25 58. Plaintiffs are informed and believe, and thereupon allege, that Defendants
26 make their infringing products available through various marketing channels, including
27 distribution networks that conduct direct sales through stores, and Internet sales.
28

1 59. Defendants' acts of marketing products which infringe the '204 Patent
2 directly and in connection with customers and other parties constitute direct and
3 contributory and/or induced infringement of the '204 Patent. Defendants have not only
4 violated the proprietary rights of Plaintiffs, but, upon information and belief, have
5 encouraged and induced others to do so, through their marketing channels and sales
6 networks and the continued sale of products which infringe the '204 Patent through
7 Defendants' direct and third party marketing channels.

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9
10 60. Defendants are liable for infringement by designing their infringing
11 products in a manner that infringes Plaintiffs' proprietary technology under the '204
12 Patent and further liable for contributory and induced infringement by encouraging others
13 to market, sell and use products which infringe the '204 Patent.

14
15
16 61. Plaintiffs are informed and believe, and thereupon allege, that Defendants
17 and each of them have infringed and continue to infringe the claims of the '204 Patent
18 literally or under the doctrine of equivalents by making, using, offering for sale and selling
19 (directly and through intermediaries or third parties) products which infringe the '204
20 Patent, in this District and elsewhere in the United States.

21
22 62. Plaintiffs are informed and believe, and thereupon allege, that Defendants
23 and each of them have contributed and continue to contribute to the literal infringement
24 and/or infringement under the doctrine of equivalents of the claims of the '204 Patent, and
25 have actively induced and continue to actively induce others to infringe the claims of the
26 '204 Patent, literally and under the doctrine of equivalents in this District and elsewhere in
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1 the United States.

2
3 63. Plaintiffs are entitled to recover from Defendants and each of them the actual
4 damages they have sustained as a direct and proximate result of Defendants' wrongful acts
5 as alleged herein, in an amount to be proven at trial under 35 U.S.C. § 284.

6
7 64. Plaintiffs are informed and believe, and thereupon allege, that Defendants'
8 infringement has been and continues to be willful and deliberate, in disregard for
9 Plaintiffs' patent rights, and that Plaintiffs are thereby entitled to increased damages up to
10 three times the amount of actual damages and attorney's fees, pursuant to 35 U.S.C. §§
11 284 and 285.

12
13 65. Defendants' continued infringement of the '204 Patent will continue to
14 damage Plaintiffs in a manner that is causing irreparable harm for which there is no
15 adequate remedy at law unless it is enjoined by this Court; therefore, Plaintiffs are
16 entitled to an injunction against Defendants' continuing infringement of the '204 Patent.

17
18 **VI.**

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20 **PRAYER FOR RELIEF**

21 **WHEREFORE**, Plaintiffs ask this Court to enter judgment in their favor against
22 Defendants and grant the following relief:

23
24 A. An adjudication that Defendants have infringed and continue to infringe,
25 directly and indirectly through contributory and/or induced infringement, each of the
26 Asserted Patents as alleged above;

27
28 B. An accounting of all damages sustained by Plaintiffs as a result of
COMPLAINT

1 Defendants' acts of infringement of each of the Asserted Patents;

2 C. An award to Plaintiffs of actual damages adequate to compensate Plaintiffs
3 for Defendants' acts of infringement, together with pre-judgment and post-judgment
4 interest;

5 D. An award to Plaintiffs of enhanced damages, up to and including the trebling
6 of Plaintiffs' damages pursuant to 35 U.S.C. § 284 for Defendants' willful infringement of
7 each of the Asserted Patents.

8 E. An award for Plaintiffs' cost of suit and reasonable attorneys' fees pursuant
9 to 35 U.S.C. 285 due to the exceptional nature of this case; or as otherwise permitted by
10 law.

11 F. A grant of preliminary and permanent injunction pursuant to 35 U.S.C. 283,
12 enjoining Defendants and each of its agents, servants employees, principals, officers,
13 attorneys, successors, assignees and all those in active concert with Defendants, including
14 related individuals and entities, customers, representatives, OEM's, dealers and
15 distributors, from further acts of (1) infringement, (2) contributory infringement, and (3)
16 active inducement to infringe with respect to the claims of each of the Asserted Patents,
17 and;

18 G. Any further relief that this Court deems just and proper.

1 Dated: March 28, 2016

DAVID AND RAYMOND IP LAW FIRM

2
3 s/Tony W. Wong/
4 TONY W. WONG

5 Attorneys for Plaintiffs
6 WP Banquet, LLC and
7 Wok & Pan Ind., Inc.
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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial on all issues triable as of right to a jury. FED.
R. Civ. P. 38(b).

Dated: March 28, 2016

DAVID AND RAYMOND IP LAW FIRM

s/Tony W. Wong/
TONY W. WONG

Attorneys for Plaintiffs
WP Banquet, LLC and
Wok & Pan Ind., Inc.