

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

CAMBRIA COMPANY LLC,

Plaintiff,

v.

WILSONART LLC and
DORADO SOAPSTONE LLC,

Defendants.

Civil Action No. _____

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Cambria Company LLC (“Cambria”) files this Complaint and demand for jury trial seeking relief for patent infringement by Defendants Wilsonart LLC (“Wilsonart”) and Dorado Soapstone LLC (“Dorado”). Cambria states and alleges the following:

NATURE OF THE ACTION

1. This is an action for infringement of United States Design Patent Nos. D712,670 (the “’670 patent”), D737,058 (the “’058 patent”), D737,576 (the “’576 patent”), D737,577 (the “’577 patent”), D738,630 (the “’630 patent”), and D713,154 (the “’154 patent”) (collectively, the “Asserted Patents”) under 35 U.S.C. §§ 1 *et seq.* On information and belief, Defendants Wilsonart and Dorado make, use, sell and/or offer to sell or import into the United States certain products (referred to herein as the “Accused Products”) that embody Cambria’s patented designs.

THE PARTIES

2. Plaintiff Cambria is a limited liability company organized under the laws of Minnesota with its principal place of business at 805 Enterprise Drive East, Suite H, Belle Plaine, Minnesota, 56011.

3. Cambria owns all rights and title in and to each of the Asserted Patents, including the right to sue for all infringement thereof, including past infringement.

4. On information and belief, Defendant Wilsonart is a limited liability company organized under the laws of Delaware with its principal place of business at 2501 Wilsonart Dr., Temple, Texas, 76504.

5. On information and belief, Defendant Dorado is a limited liability company organized under the laws of Colorado with its principal place of business at 940 S. Jason St. Unit 9, Denver, Colorado, 80223.

JURISDICTION AND VENUE

6. This action for design patent infringement arises under the Patent Laws of the United States, specifically 35 U.S.C. §§ 271, 281-285.

7. This civil action asserts claims arising under the Patent Laws of the United States, 35 U.S.C. §§ 1 *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

8. This Court has personal jurisdiction over Defendants Wilsonart and Dorado for at least the following reasons:

a. Defendants Wilsonart and Dorado have established minimum contacts with this forum such that the exercise of jurisdiction over them would not offend traditional notions of fair play and substantial justice;

b. Defendants Wilsonart and Dorado have done and continue to do business in Minnesota, including but not limited to sale of the Accused Products. On information and belief, Defendants Wilsonart and Dorado sell the Accused Products in the State of Minnesota through company-owned and independent Minnesota distributors;

c. On information and belief, Defendant Wilsonart and Dorado have entered into contracts with one or more Minnesota residents—specifically, distributors and dealers—to supply products or services within the State of Minnesota; and

d. Defendants Wilsonart and Dorado maintain warranty services, which are referenced on their websites, on Accused Products within the State of Minnesota.

9. As such, upon information and belief, Defendants Wilsonart and Dorado have intended to benefit by doing business in the State of Minnesota, and personal jurisdiction over them is appropriate.

10. Venue is proper in this Judicial District under 28 U.S.C. § 1391(b) and (c) and § 1400(b), at least because Defendants Wilsonart and Dorado have committed acts of infringement in this district and Cambria has suffered harm resulting from that infringement in this district.

BACKGROUND OF THE ACTION

11. Cambria is the leading designer and manufacturer of quartz products, specializing in quartz stone products. Founded in 2000, Cambria has been at the forefront of the rapidly-developing United States market for quartz surface products. Cambria's quartz surface product success has attracted numerous competitors to the marketplace, including Defendants Wilsonart and Dorado.

12. Upon information and belief, Defendants Wilsonart and Dorado make, use, sell and/or offer to sell or import into the United States quartz surface products. Many of those products embody Cambria's innovative designs, which are protected under Cambria's U.S. design patents. Cambria owns all rights, title and interests in and to the Asserted Patents, including the rights to recover for past, present, and future infringements and violations thereof.

By virtue of the activities set forth above, Defendants Wilsonart and Dorado infringe one or more designs claimed in the Asserted Patents.

13. Before launching its collection of quartz surface products in early 2015, Wilsonart was a distributor of Cambria products for several years and had been in talks with Cambria regarding a potential business relationship under which Cambria would manufacture and sell quartz to Wilsonart for distribution under a Wilsonart brand. That relationship did not come to fruition, however, and Wilsonart chose instead to end its distribution relationship with Cambria and import and distribute quartz products manufactured by foreign suppliers—many of them knock-offs of designs claimed in one or more of the Asserted Patents.

14. Rather than develop its own novel designs, Wilsonart and its supplier(s) elected to produce knock-offs of Cambria's patented designs, including at least those covered by the '670 patent, the '058 patent, the '576 patent, the '577 patent, and the '630 patent. Cambria informed Wilsonart of its infringement of Cambria's intellectual property rights, including by a November 19, 2015 letter requesting that Wilsonart cease and desist from importing and selling quartz products that infringe Cambria's intellectual property rights. The letter specifically identified Wilsonart's "Arno," "Aurora," "Badaling," "Murren," and "Santiago" designs, among others, as infringing Cambria's intellectual property rights. However, Wilsonart has continued to make, use, sell, import, and/or offer to sell quartz products, including at least its "Arno," "Aurora," "Badaling," "Murren," and "Santiago" designs, each of which infringes of the Asserted Patents.

15. On May 22, 2015, Cambria informed Dorado of its infringement of Cambria's '154 patent. However, Dorado has continued to make, use, sell, import, and/or offer to sell quartz products, including at least its Nustone "Tundra" design, that infringe one or more of the Asserted Patents.

COUNT I: INFRINGEMENT OF U.S. DESIGN PATENT NO. D712,670
(WILSONART)

16. Cambria incorporates by reference the allegations contained in paragraphs 1-15 above as if repeated here in full.

17. Cambria is the lawful owner of the '670 patent, entitled "Portion of a Slab." The United States Patent and Trademark Office duly and legally issued the '670 patent on September 9, 2014. A true and correct copy of the '670 patent is attached to this Complaint as **Exhibit A**.

18. On information and belief, Defendant Wilsonart has actual knowledge of the '670 patent, at least by virtue of the filing of this Complaint. In addition, Cambria informed Wilsonart, via a November 19, 2014 cease and desist letter, that it was infringing several of the Asserted Patents. The letter specifically identified Wilsonart's "Arno," "Aurora," "Badaling," "Murren," and "Santiago" as infringing product designs. Yet, Wilsonart has continued to make, use, sell, offer to sell, and import those products.

19. On information and belief, Defendant Wilsonart has been and currently is infringing the design claimed in the '670 patent by making, using, offering for sale, and/or selling within or importing into the United States, without authority, products embodying the patented design claimed in the '670 patent. Specifically, Wilsonart's "Arno" products directly infringe the '670 patent because an ordinary observer, giving such attention as a purchaser usually gives, would be deceived by the substantial similarity between the designs so as to be induced to purchase Wilsonart's "Arno" products believing them to be the same as the design embodied and claimed in the '670 patent. Review of Wilsonart's "Arno" products demonstrates that the products literally infringe the '670 patent:

Photograph Comparing Color Photograph Submitted to the USPTO for U.S. Design Patent No. D712,670 (left) to Physical Sample of Accused Wilsonart “Arno” Product (right)



20. On information and belief, with knowledge of the '670 patent, Defendant Wilsonart has actively induced and continues to induce direct infringement of the '670 patent by others by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

21. On information and belief, with knowledge of the '670 patent, Defendant Wilsonart has contributed and continues to contribute to the others' infringement of the '670 patent by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

22. Cambria has suffered and will continue to suffer damage due to Defendant Wilsonart's infringement of the '670 patent. Thus, under 35 U.S.C. § 289, Cambria is entitled to recover damages adequate to compensate for such infringement, including a recovery of

Defendant Wilsonart's total profits derived from its unlawful conduct alleged herein or lost profits, but in no event less than a reasonable royalty for infringing the '670 patent, together with interest and costs fixed by this Court.

23. Defendant Wilsonart has engaged and is engaged in willful and deliberate infringement of the '670 patent or, at the very least, a reckless disregard for Cambria's patent rights. Defendant Wilsonart's continued infringement following notice of the '670 patent claims qualifies as willful, and Cambria is entitled to treble damages, attorney's fees, and costs incurred in this action, along with prejudgment interest under 35 U.S.C. §§ 284, 285.

24. Cambria is entitled to a permanent injunction preventing Defendant Wilsonart from further infringing the '670 patent. Defendant Wilsonart's infringement of the '670 patent has caused and will continue to cause irreparable harm to Cambria that will continue unless and until it is enjoined by this Court.

COUNT II: INFRINGEMENT OF U.S. DESIGN PATENT NO. D737,058
(WILSONART)

25. Cambria incorporates by reference the allegations contained in paragraphs 1-24 above as if repeated here in full.

26. Cambria is the lawful owner of the '058 patent, entitled "Portion of a Slab." The '058 Patent was duly and legally issued by the United States Patent and Trademark Office on August 25, 2015. A true and correct copy of the '058 patent is attached to this Complaint as **Exhibit B.**

27. On information and belief, Defendant Wilsonart has actual knowledge of the '058 patent, at least by virtue of the filing of this Complaint. In addition, Cambria informed Wilsonart, via a November 19, 2014 cease and desist letter, that it was infringing several of the Asserted Patents. The letter specifically identified Wilsonart's "Arno," "Aurora," "Badaling," "Murren,"

and “Santiago” as infringing product designs. Yet, Wilsonart has continued to make, use, sell, offer to sell, and import those products.

28. On information and belief, Defendant Wilsonart has been and currently is infringing the design claimed in the '058 patent by making, using, offering for sale, and/or selling within or importing into the United States, without authority, products embodying the patented design claimed in the '058 patent. Specifically, Wilsonart's “Aurora” products directly infringe the '058 patent because an ordinary observer, giving such attention as a purchaser usually gives, would be deceived by the substantial similarity between the designs so as to be induced to purchase Wilsonart's “Aurora” products believing them to be the same as the design embodied and claimed in the '058 patent. Review of Wilsonart's “Aurora” products demonstrates that the products literally infringe the '058 patent:

Photograph Comparing Color Photograph Submitted to the USPTO for U.S. Design Patent No. D737,058 (left) to Physical Sample of Accused Wilsonart “Aurora” Product (right)



29. On information and belief, with knowledge of the '058 patent, Defendant Wilsonart has actively induced and continues to induce direct infringement of the '058 patent by others by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

30. On information and belief, with knowledge of the '058 patent, Defendant Wilsonart has contributed and continues to contribute to the others' infringement of the '058 patent by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

31. Cambria has suffered and will continue to suffer damage due to Defendant Wilsonart's infringement of the '058 patent. Thus, under 35 U.S.C. § 289, Cambria is entitled to recover damages adequate to compensate for such infringement, including a recovery of Defendant Wilsonart's total profits derived from its unlawful conduct alleged herein or lost profits, but in no event less than a reasonable royalty for infringing the '058 patent, together with interest and costs fixed by this Court.

32. Defendant Wilsonart has engaged and is engaged in willful and deliberate infringement of the '058 patent or, at the very least, a reckless disregard for Cambria's patent rights. Defendant Wilsonart's continued infringement following notice of the '058 patent claims qualifies as willful, and Cambria is entitled to treble damages, attorney's fees, and costs incurred in this action, along with prejudgment interest under 35 U.S.C. §§ 284, 285.

33. Cambria is entitled to a permanent injunction preventing Defendant Wilsonart from further infringing the '058 patent. Defendant Wilsonart's infringement of the '058 patent has caused and will continue to cause irreparable harm to Cambria that will continue unless and until it is enjoined by this Court.

COUNT III: INFRINGEMENT OF U.S. DESIGN PATENT NO. D737,576
(WILSONART)

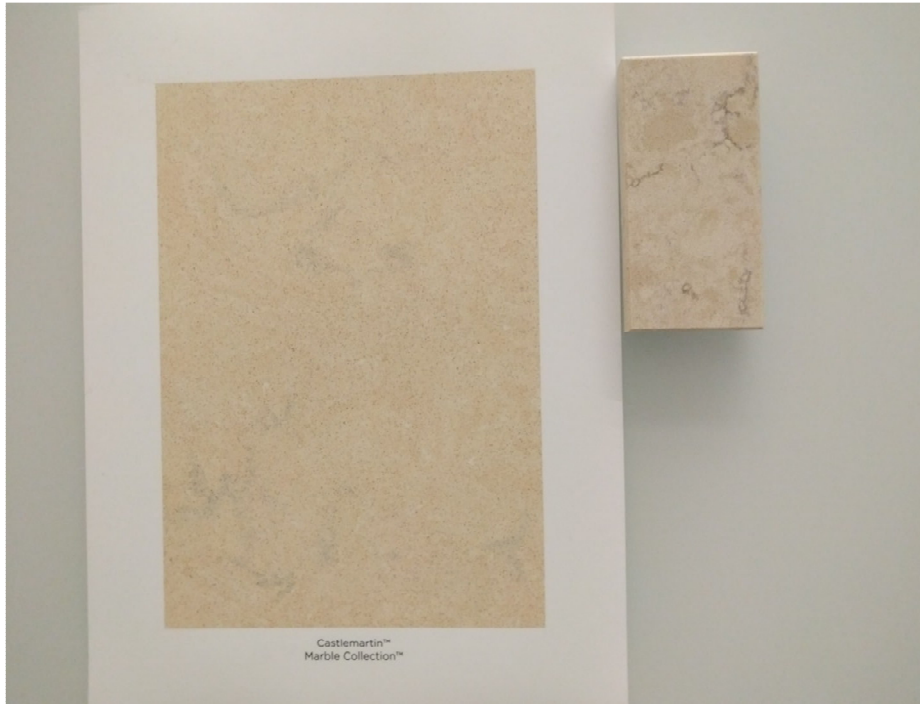
34. Cambria incorporates by reference the allegations contained in paragraphs 1-33 above as if repeated here in full.

35. Cambria is the lawful owner of '576 patent, entitled "Portion of a Slab." The '576 patent was duly and legally issued by the United States Patent and Trademark Office on September 1, 2015. A true and correct copy of the '576 patent is attached to this Complaint as **Exhibit C**.

36. On information and belief, Defendant Wilsonart has actual knowledge of the '576 patent, at least by virtue of the filing of this Complaint. In addition, Cambria informed Wilsonart, via a November 19, 2014 cease and desist letter, that it was infringing several of the Asserted Patents. The letter specifically identified Wilsonart's "Arno," "Aurora," "Badaling," "Murren," and "Santiago" as infringing product designs. Yet, Wilsonart has continued to make, use, sell, offer to sell, and import those products.

37. On information and belief, Defendant Wilsonart has been and currently is infringing the design claimed in the '576 patent by making, using, offering for sale, and/or selling within or importing into the United States, without authority, products embodying the patented design claimed in the '576 patent. Specifically, Wilsonart's "Badaling" products directly infringe the '576 patent because an ordinary observer, giving such attention as a purchaser usually gives, would be deceived by the substantial similarity between the designs so as to be induced to purchase Wilsonart's "Badaling" products believing them to be the same as the design embodied and claimed in the '576 patent. Review of Wilsonart's "Badaling" products demonstrates that the products literally infringe the '576 patent:

Photograph Comparing Color Photograph Submitted to the USPTO for U.S. Design Patent No. D737,576 (left) to Physical Sample of Accused Wilsonart “Badaling” Product (right)



38. On information and belief, with knowledge of the '576 patent, Defendant Wilsonart has actively induced and continues to induce direct infringement of the '576 patent by others by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

39. On information and belief, with knowledge of the '576 patent, Defendant Wilsonart has contributed and continues to contribute to the others' infringement of the '576 patent by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

40. Cambria has suffered and will continue to suffer damage due to Defendant Wilsonart's infringement of the '576 patent. Thus, under 35 U.S.C. § 289, Cambria is entitled to recover damages adequate to compensate for such infringement, including a recovery of

Defendant Wilsonart's total profits derived from its unlawful conduct alleged herein or lost profits, but in no event less than a reasonable royalty for infringing the '576 patent, together with interest and costs fixed by this Court.

41. Defendant Wilsonart has engaged and is engaged in willful and deliberate infringement of the '576 patent or, at the very least, a reckless disregard for Cambria's patent rights. Defendant Wilsonart's continued infringement following notice of the '576 patent claims qualifies as willful, and Cambria is entitled to treble damages, attorney's fees, and costs incurred in this action, along with prejudgment interest under 35 U.S.C. §§ 284, 285.

42. Cambria is entitled to a permanent injunction preventing Defendant Wilsonart from further infringing the '576 patent. Defendant Wilsonart's infringement of the '576 patent has caused and will continue to cause irreparable harm to Cambria that will continue unless and until it is enjoined by this Court.

COUNT IV: INFRINGEMENT OF U.S. DESIGN PATENT NO. D737,577
(WILSONART)

43. Cambria incorporates by reference the allegations contained in paragraphs 1-42 above as if repeated here in full.

44. Cambria is the lawful owner of the '577 patent, entitled "Portion of a Slab." The '577 patent was duly and legally issued by the United States Patent and Trademark Office on September 1, 2015. A true and correct copy of the '577 patent is attached to this Complaint as **Exhibit D**.

45. On information and belief, Defendant Wilsonart has actual knowledge of the '577 patent, at least by virtue of the filing of this Complaint. In addition, Cambria informed Wilsonart, via a November 19, 2014 cease and desist letter, that it was infringing several of the Asserted Patents. The letter specifically identified Wilsonart's "Arno," "Aurora," "Badaling," "Murren,"

and “Santiago” as infringing product designs. Yet, Wilsonart has continued to make, use, sell, offer to sell, and import those products.

46. On information and belief, Defendant Wilsonart has been and currently is infringing the design claimed in the '577 patent by making, using, offering for sale, and/or selling within or importing into the United States, without authority, products embodying the patented design claimed in the '577 patent. Specifically, Wilsonart's “Santiago” products directly infringe the '577 patent because an ordinary observer, giving such attention as a purchaser usually gives, would be deceived by the substantial similarity between the designs so as to be induced to purchase Wilsonart's “Santiago” products believing them to be the same as the design embodied and claimed in the '577 patent. Review of Wilsonart's “Santiago” products demonstrates that the products literally infringe the '576 patent:

Photograph Comparing Color Photograph Submitted to the USPTO for U.S. Design Patent No. D737,577 (left) to Physical Sample of Accused Wilsonart “Santiago” Product (right)



47. On information and belief, with knowledge of the '577 patent, Defendant Wilsonart has actively induced and continues to induce direct infringement of the '577 patent by others by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

48. On information and belief, with knowledge of the '577 patent, Defendant Wilsonart has contributed and continues to contribute to the others' infringement of the '577 patent by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

49. Cambria has suffered and will continue to suffer damage due to Defendant Wilsonart's infringement of the '577 patent. Thus, under 35 U.S.C. § 289, Cambria is entitled to recover damages adequate to compensate for such infringement, including a recovery of Defendant Wilsonart's total profits derived from its unlawful conduct alleged herein or lost profits, but in no event less than a reasonable royalty for infringing the '577 patent, together with interest and costs fixed by this Court.

50. Defendant Wilsonart has engaged and is engaged in willful and deliberate infringement of the '577 patent or, at the very least, a reckless disregard for Cambria's patent rights. Defendant Wilsonart's continued infringement following notice of the '577 patent claims qualifies as willful, and Cambria is entitled to treble damages, attorney's fees, and costs incurred in this action, along with prejudgment interest under 35 U.S.C. §§ 284, 285.

51. Cambria is entitled to a permanent injunction preventing Defendant Wilsonart from further infringing the '577 patent. Defendant Wilsonart's infringement of the '577 patent has caused and will continue to cause irreparable harm to Cambria that will continue unless and until it is enjoined by this Court.

COUNT V: INFRINGEMENT OF U.S. DESIGN PATENT NO. D738,630
(WILSONART)

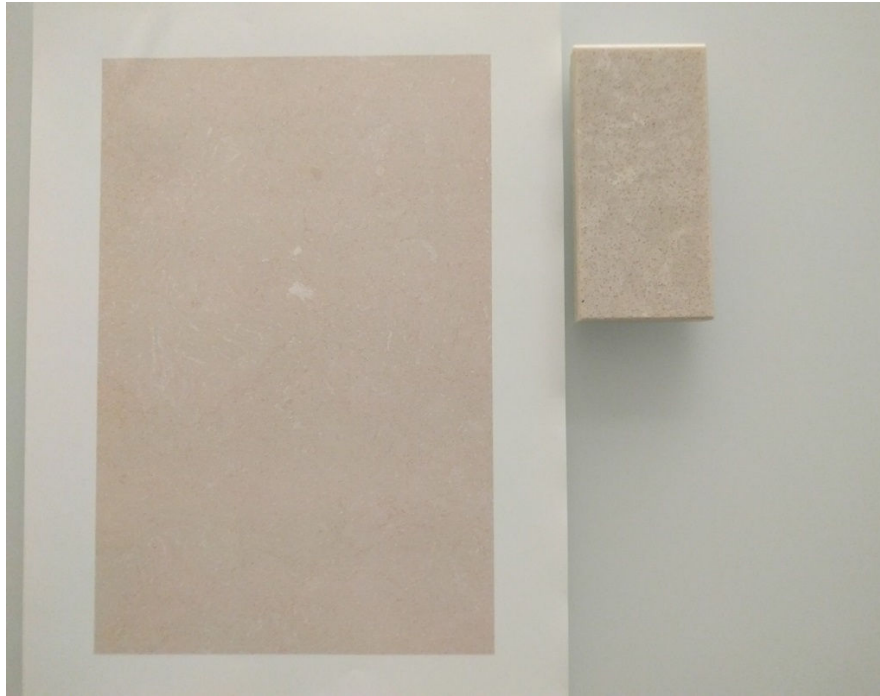
52. Cambria incorporates by reference the allegations contained in paragraphs 1-51 above as if repeated here in full.

53. Cambria is the lawful owner of the '630 patent, entitled "Portion of a Slab." The '630 patent was duly and legally issued by the United States Patent and Trademark Office on September 15, 2015. A true and correct copy of the '630 patent is attached to this Complaint as **Exhibit E**.

54. On information and belief, Defendant Wilsonart has actual knowledge of the '630 patent, at least by virtue of the filing of this Complaint. In addition, Cambria informed Wilsonart, via a November 19, 2014 cease and desist letter, that it was infringing several of the Asserted Patents. The letter specifically identified Wilsonart's "Arno," "Aurora," "Badaling," "Murren," and "Santiago" as infringing product designs. Yet, Wilsonart has continued to make, use, sell, offer to sell, and import those products.

55. On information and belief, Defendant Wilsonart has been and currently is infringing the design claimed in the '630 patent by making, using, offering for sale, and/or selling within or importing into the United States, without authority, products embodying the patented design claimed in the '630 patent. Specifically, Wilsonart's "Murren" products directly infringe the '630 patent because an ordinary observer, giving such attention as a purchaser usually gives, would be deceived by the substantial similarity between the designs so as to be induced to purchase Wilsonart's "Murren" products believing them to be the same as the design embodied and claimed in the '630 patent. Review of Wilsonart's "Murren" products demonstrates that the products literally infringe the '630 patent:

Photograph Comparing Color Photograph Submitted to the USPTO for U.S. Design Patent No. D737,630 (left) Physical Sample of Accused Wilsonart “Murren” Product (right)



56. On information and belief, with knowledge of the '630 patent, Defendant Wilsonart has actively induced and continues to induce direct infringement of the '630 patent by others by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

57. On information and belief, with knowledge of the '630 patent, Defendant Wilsonart has contributed and continues to contribute to the others' infringement of the '630 patent by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

58. Cambria has suffered and will continue to suffer damage due to Defendant Wilsonart's infringement of the '630 patent. Thus, under 35 U.S.C. § 289, Cambria is entitled to recover damages adequate to compensate for such infringement, including a recovery of

Defendant Wilsonart's total profits derived from its unlawful conduct alleged herein or lost profits, but in no event less than a reasonable royalty for infringing the '630 patent, together with interest and costs fixed by this Court.

59. Defendant Wilsonart has engaged and is engaged in willful and deliberate infringement of the '630 patent or, at the very least, a reckless disregard for Cambria's patent rights. Defendant Wilsonart's continued infringement following notice of the '630 patent claims qualifies as willful, and Cambria is entitled to treble damages, attorney's fees, and costs incurred in this action, along with prejudgment interest under 35 U.S.C. §§ 284, 285.

60. Cambria is entitled to a permanent injunction preventing Defendant Wilsonart from further infringing the '630 patent. Defendant Wilsonart's infringement of the '630 patent has caused and will continue to cause irreparable harm to Cambria that will continue unless and until it is enjoined by this Court.

COUNT VI: INFRINGEMENT OF U.S. DESIGN PATENT NO. D713,154
(DORADO)

61. Cambria incorporates by reference the allegations contained in paragraphs 1-60 above as if repeated here in full.

62. Cambria is the lawful owner of the '154 patent, entitled "Portion of a Slab." The '154 patent was duly and legally issued by the United States Patent and Trademark Office on September 11, 2014. A true and correct copy of the '154 patent is attached to this Complaint as **Exhibit F**.

63. On information and belief, Defendant Dorado has actual knowledge of the '154 patent, at least by virtue of the filing of this Complaint. In addition, Cambria sent Dorado a letter on May 22, 2015, informing it of its infringement. Dorado, however, has continued to make,

use, offer to sell, and/or sell in or import into the United States quartz surface products that infringe the '154 patent.

64. On information and belief, Defendant Dorado has been and currently is infringing the design claimed in the '154 patent by making, using, offering for sale, and/or selling within or importing into the United States, without authority, products embodying the patented design claimed in the '154 patent.

65. On information and belief, Defendant Dorado has been and currently is infringing the design claimed in the '154 patent by making, using, offering for sale, and/or selling within or importing into the United States, without authority, products embodying the patented design claimed in the '154 patent. Specifically, Dorado's "Tundra" products directly infringe the '154 patent because an ordinary observer, giving such attention as a purchaser usually gives, would be deceived by the substantial similarity between the designs so as to be induced to purchase Dorado's "Tundra" products believing them to be the same as the design embodied and claimed in the '154 patent. Review of Dorado's "Tundra" products demonstrates that the products literally infringe the '154 patent:

Photograph Comparing Color Photograph Submitted to the USPTO for U.S. Design Patent No. D737,154 (left) to Physical Sample of Accused Dorado “Tundra” Product (right)



66. On information and belief, with knowledge of the '154 patent, Defendant Dorado has actively induced and continues to induce direct infringement of the '154 patent by others by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

67. On information and belief, with knowledge of the '154 patent, Defendant Dorado has contributed and continues to contribute to the others' infringement of the '154 patent by, among other things, providing third parties, such as distributors and dealers, with the Accused Products.

68. Cambria has suffered and will continue to suffer damage due to Defendant Dorado's infringement of the '154 patent. Thus, under 35 U.S.C. § 289, Cambria is entitled to

recover damages adequate to compensate for such infringement, including a recovery of Defendant Dorado's total profits derived from its unlawful conduct alleged herein or lost profits, but in no event less than a reasonable royalty for infringing the '154 patent, together with interest and costs fixed by this Court.

69. Defendant Dorado has engaged and is engaged in willful and deliberate infringement of the '154 patent or, at the very least, a reckless disregard for Cambria's patent rights. Defendant Dorado's continued infringement following notice of the '154 patent claims qualifies as willful, and Cambria is entitled to treble damages, attorney's fees, and costs incurred in this action, along with prejudgment interest under 35 U.S.C. §§ 284, 285.

70. Cambria is entitled to a permanent injunction preventing Defendant Dorado from further infringing the '154 patent. Defendant Dorado's infringement of the '154 patent has caused and will continue to cause irreparable harm to Cambria that will continue unless and until it is enjoined by this Court.

EXCEPTIONAL CASE

71. This case is exceptional against Defendants Wilsonart and Dorado.

PRAYER FOR RELIEF

72. WHEREFORE, Cambria respectfully requests this Court enter:

- a. A judgment in favor of Cambria that Defendant Wilsonart has directly infringed the '670 patent, the '058 patent, the '576 patent, the '577 patent, and the '630 patent;
- b. A judgment in favor of Cambria that Defendant Wilsonart has induced infringement of the '670 patent, the '058 patent, the '576 patent, the '577 patent, and the '630 patent;

c. A judgment in favor of Cambria that Defendant Wilsonart has contributed to the infringement of the '670 patent, the '058 patent, the '576 patent, the '577 patent, and the '630 patent;

d. A judgment in favor of Cambria that the Defendant Dorado has directly infringed the '154 patent;

e. A judgment in favor of Cambria that the Defendant Dorado has induced infringement of the '154 patent;

f. A judgment in favor of Cambria that the Defendant Dorado has contributed to the infringement of the '154 patent;

g. A judgment in favor of Cambria that this case is “exceptional” within the meaning of 35 U.S.C. § 285, and an award to Cambria of its reasonable attorneys’ fees, expenses, and costs incurred in this action;

h. A permanent injunction enjoining Defendants Wilsonart and Dorado and their officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with them, from infringing, inducing the infringement of, or contributing to the infringement of the Asserted Patents;

i. A judgment requiring the Defendants Wilsonart and Dorado to pay to Cambria the extent of Defendants’ total profit and revenue realized and derived from their infringement of the Assert Patents, and actual damages in an amount not less than a reasonable royalty for Defendants’ infringement;

j. An award of enhanced damages not less than three times the damages assessed for Defendants’ infringement of the Asserted Patents, in accordance with 35 U.S.C. § 284; and

k. Any and all relief as this Court deems proper and just.

DEMAND FOR JURY TRIAL

73. Cambria demands trial by jury on any and all issues so triable.

Dated: April 14, 2016

FISH & RICHARDSON P.C.

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