

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JEZIGN LICENSING, LLC
4400 East West Highway, Suite 811
Bethesda, Maryland 20814-4508,

Plaintiff,

v.

NIKE, INC.
One Bowerman Drive
Beaverton, Oregon 97005-6453

Serve On:
National Registered Agents, Inc. of
Maryland
351 W. Camden Street
Baltimore, Maryland 21201,

Defendant.

Case No. _____

JURY TRIAL DEMANDED

COMPLAINT

Jezign Licensing, LLC (“Jezign”) brings this patent-infringement action against Nike, Inc. (“Nike”).

Parties

1. Jezign is a New York limited liability company, having its principal place of business in Bethesda, Maryland.

2. Nike is an Oregon corporation, having its principal place of business in Beaverton, Oregon.

Jurisdiction and Venue

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101, *et seq.*

4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Nike. Nike conducts continuous and systematic business in this District, and this patent-infringement case arises in part directly from Nike's continuous and systematic activity in this District. This Court's exercise of jurisdiction over Nike would be consistent with the Maryland long-arm statute and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(1)-(2) and 1400(b).

Infringement of U.S. Patent No. 6,837,590

7. Jezign owns United States Patent 6,837,590 (the "'590 Patent") (attached hereto as Exhibit A).

8. Nike infringes claims 1 and 2 of the '590 Patent through provision of its "Nike Mag" and "Nike HyperAdapt" shoe products.

9. For illustration, and without limitation to the goods and attributes of those goods that Jezign alleges infringe claims 1 and 2 of the '590 Patent, Nike infringes the '590 Patent as follows:

- a. Claim 1 describes "[a]n illuminated shoe comprising . . . a light source disposed within [the] sole . . ." (Ex A, 4:61-65.) Nike incorporates this feature into its "Nike Mag" and "Nike HyperAdapt" shoes by placing an illumination system in the sole of the shoe.
- b. In claim 1, the illumination system involves "a push-button switch coupled to said light source to activate the light source . . ." (Ex. A, 4:66-

67.) Nike incorporates this feature into its “Nike Mag” and “Nike HyperAdapt” shoes by using an on/off push button to activate the illumination in the sole of the shoe.

- c. Next, claim 1 describes how “the light source provides continuous illumination across a substantial portion of the perimeter surface regardless of whether the wearer is standing still or walking.” (Ex. A, 4:67-5:3.) Nike incorporates this feature into its “Nike Mag” and “Nike HyperAdapt” shoes by having the illumination source in the sole emit light independent of whether the shoe is in motion.
- d. In claim 2, the illumination system “includes a plurality of contiguous light emitting devices disposed in said sole that form a substantially uniform illumination pattern across the perimeter surface.” (Ex. A, 5:5-7). Nike incorporates this feature into its “Nike Mag” and “Nike HyperAdapt” shoes by placing contiguous illumination sources in the sole such that it forms a substantially uniform pattern across the sole’s perimeter.

10. Jezign has been and will continue to be irreparably harmed by Nike’s infringement of the ‘590 Patent.

Prayer for Relief

WHEREFORE, Jezign prays for the following relief against Nike:

- a. Judgment that Nike has infringed claims of the ‘590 Patent;
- b. A reasonable royalty pursuant to 35 U.S.C. § 284;
- c. Injunctive relief;

- d. Pre-judgment interest and post-judgment interest at the maximum rate allowed by law; and
- e. Such other and further relief as the Court may deem just and proper.

Demand for Jury Trial

Jezign demands a trial by jury on all matters and issues triable by jury.

Date: April 21, 2016

Respectfully submitted,

/s/

Andrew D. Freeman (Fed. Bar No. 03867)
Albert Elia (Fed. Bar No. 14130)
Brown Goldstein & Levy, LLP
120 E. Baltimore St., Suite 1700
Baltimore, MD 21202
Tel: (410) 962-1030
Fax: (410) 385-0869
adf@browngold.com
aelia@browngold.com

Matthew M. Wawrzyn (*pro hac vice* pending)
Wawrzyn & Jarvis LLC
233 S. Wacker Dr., 84th Floor
Chicago, IL 60606
Tel: (847) 274-9844
matt@wawrzynlaw.com

Counsel for Plaintiff Jezign Licensing, LLC