

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

COBRA JET STEERING LLC,

Plaintiff,

v.

JETBOATPILOT LLC,

CASE NO.

Defendant.

/

**COMPLAINT FOR DECLARATORY JUDGMENT OF PATENT
NONINFRINGEMENT AND INVALIDITY**

Plaintiff, Cobra Jet Steering, LLC (“Cobra Jet” or “Plaintiff”), hereby files this Complaint and sues Defendant JetBoatPilot LLC (“JetBoatPilot” or “Defendant”), and alleges as follows:

NATURE OF THE CASE

1. This is a civil action arising under the Patent Laws of the United States, 35 U.S.C.A. §§ 101 et. seq., seeking a declaratory judgment that U.S. Patent No. 9,359,054 is invalid and/or unenforceable, and that no valid and enforceable claim of the patent is infringed by Plaintiff.

THE PARTIES

2. Plaintiff is a limited liability company located in Pinellas Park, Florida.

3. On information and belief, Defendant is a limited liability company with its principal place of business in Panama City, Florida. According to Defendant’s

attorneys, Defendant owns U.S. Patent Number 9,359,054, titled “Control Mechanism” (hereafter “the Asserted Patent”), a copy of which is attached hereto as Exhibit A.

4. The Asserted Patent was filed on December 18, 2012, and names Thomas W. Watts, Miller W. Owen, III, Shane Huseby, and Steven Caskey as coinventors. On information and belief, some or all of the alleged coinventors are managers and/or members of Defendant.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction under the Declaratory Judgment Act, 28 U.S.C.A. §§ 2201, 2202 and under 28 U.S.C.A. §§ 1331, 1338(a) and the patent laws of the United States, 35 U.S.C. §101 *et seq.*

6. There is an actual case or controversy within the jurisdiction of this Court under 28 U.S.C.A. §§ 2201 and 2202.

7. This Court has personal jurisdiction over Defendant because, on information and belief, Defendant has: purposefully directed its activities at residents of this District; has had continuous and systematic contacts with the residents of this District; has conducted, and is, conducting business with residents of this District, such business having an effect in this District; the claims asserted arise out of and/or are related to Defendant’s activities within this District, and Defendant regularly conducts substantial business in this District and has voluntarily availed itself of the laws and regulations of this District.

8. In particular, Defendant has purposefully, continuously, and systematically directed its marketing, offers to sell, and sales of its products to residents of this District

through a number of dealers located in this District, as well as through Defendant's publicly accessible web site located at <https://www.jetboatpilot.com>.

9. Venue is proper under 28 U.S.C.A. § 1391 at least because Defendant is subject to personal jurisdiction within this District.

JURISDICTION AND VENUE

10. Plaintiff and Defendant are direct competitors. Plaintiff sells a product known as the "Cobra Venom Ultimate" which aids in the steering control of jet-propelled watercraft. Plaintiff owns three patents directed to the control of jet-powered watercraft, including Patent Nos. 6,561,858 issued May 13, 2003; Patent No. 6,702,630 issued March 9, 2004; and Patent No. 8,425,269 issued April 23, 2013.

11. Defendant also sells products that are directed to the control of jet-powered watercraft. In furtherance of its efforts to compete with Plaintiff, Defendant has purposefully undertaken activities and communications directed at this District, and/or having effects within this District. Specifically, through counsel, Defendant sent a letter dated July 8, 2016 ("the Cease and Desist Letter") by certified mail to Plaintiff within this District. *See Exhibit B*. In the Cease and Desist Letter, Defendant's attorneys advised that their analysis indicated that the Cobra Venom Ultimate

infringes all three claims of the [Asserted] Patent in violation of Section 271 of the Patent Act. ***Every limitation of the [Asserted] Patent is met by the Cobra Jet's "Cobra Venom Ultimate. In fact, the "Cobra Venom Ultimate is identical to the device disclosed and claimed in the [Asserted] Patent.***

Exhibit B, at p.1 (emphasis added). Through counsel, Defendant further threatened that Plaintiff must "immediately cease and desist from all further infringing activity," and that should Plaintiff fail to do so, or otherwise fail to provide a "satisfactory response" within

the time allowed, Defendant would “take all necessary steps to protect its valuable intellectual property rights, without further notice to [Plaintiff], including reserving its rights to all legal and equitable remedies, including the right to seek injunctive relief and monetary damages.” *Exhibit B, at p.2.*

12. Counsel for Plaintiff thereafter contacted counsel for Defendant and advised that Plaintiff did not believe that Plaintiff’s Cobra Jet Ultimate infringed the Asserted Patent, including identifying the specific claim elements in each claim of the Asserted Patent that are not present in Plaintiff’s product.

13. In an effort to resolve the dispute, the parties, through counsel, agreed that Defendant’s counsel would provide a claims chart that identified the structural elements in Defendant’s Cobra Jet Ultimate that corresponded to the claim elements in the Asserted Patent. Upon receipt, Plaintiff’s counsel would respond with Plaintiff’s contentions, and the parties would then attempt to resolve any differences that remained.

14. Although Defendant’s counsel was to provide the claims chart in a “week or so,” no chart was provided. After four weeks, Plaintiff’s counsel sent a follow-up email inquiring whether Defendant agreed that Plaintiff did not infringe, and if not, inquiring when Plaintiff would receive Defendant’s claims chart. In response, Defendant’s counsel advised that they were still working on the claims chart, and that it would be provided within the next few weeks.

15. It has now over four weeks later – nine weeks since Defendant sent the Cease and Desist Letter – and Defendant has never provided any claims chart as promised. Presumably Defendant would have had their counsel prepare a claims chart before ever sending the Cease and Desist Letter.

16. On information and belief, Defendant is aware that it has no valid basis to accuse Plaintiff of infringing the Asserted Patent, but nonetheless had its counsel send the Cease and Desist Letter to improperly interfere with Plaintiff's business operations and to cause Plaintiff to incur legal fees unnecessarily so that Defendant can better compete with Plaintiff in the marketplace. Plaintiff has had to devote effort and incur legal fees responding to Defendant's threat of litigation, and Plaintiff's sales have, in fact, declined since it received Defendant's Cease and Desist Letter.

17. Based on the foregoing, there exists a substantial, actual and justiciable controversy between Defendant and Plaintiff as to infringement and invalidity of the Asserted Patent which is of sufficient immediacy and reality to warrant the issuance of a declaratory judgment.

18. Plaintiff is in need of a declaration from this Court that the Asserted Patent is invalid and/or unenforceable and that Plaintiff does not infringe any valid claim of the Asserted Patent so that Plaintiff may resume its normal operations without the threat of a lawsuit against Plaintiff or Plaintiff's customers.

19. Plaintiff has not infringed the Patent, either directly or indirectly, literally or under the doctrine of equivalents, jointly, individually, or otherwise, and is entitled to a declaration to that effect.

20. The Asserted Patent is invalid and unenforceable because the Asserted Patent was not obtained in a manner consistent with, and required by, the provisions of the patent statutes of the United States, namely, 35 U.S.C.A. §§ 102, 103 and/or 112.

13. All conditions precedent to this action have been waived or performed or have occurred.

14. This is an exceptional case entitling Plaintiff to an award of its attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. §285.

RELIEF DEMANDED

WHEREFORE, Plaintiff demands judgment against Defendant and respectfully requests:

- A. That this Court declare that Plaintiff and Plaintiff's customer have not infringed, and do not infringe, contribute to the infringement of, indirectly infringe, induce infringement of, or willfully infringe, any valid claim of the Asserted Patent.
- B. A declaratory judgment that each of the claims of the Asserted Patent is invalid and unenforceable.
- C. A declaratory judgment that Defendant and each of its affiliates, subsidiaries, officers, employees, agents, partners, investors, successors, assigns, alter egos, attorneys, and any person in active concert or participation with them be restrained and enjoined from asserting that any claim of the Asserted Patent is valid and infringed by Plaintiff or Plaintiff's customers.
- D. A declaration that this case exceptional under 35 U.S.C.A. § 285, and awarding Plaintiff its attorneys fees;
- E. An award to Plaintiff its cost of suit incurred herein;
- F. An award to Plaintiff such other and additional relief as this Court deems just and proper.

Dated: September 15, 2016

Respectfully submitted,



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(12) **United States Patent**
Watts et al.

(10) **Patent No.:** **US 9,359,054 B2**
(45) **Date of Patent:** **Jun. 7, 2016**

(54) **CONTROL MECHANISM**

(71) Applicants: **Thomas W Watts**, Panama City, FL (US); **Miller W Owen, III**, Panama City, FL (US); **Shane Huseby**, Panama City, FL (US); **Steven Edward Caskey**, Panama City, FL (US)

(72) Inventors: **Thomas W Watts**, Panama City, FL (US); **Miller W Owen, III**, Panama City, FL (US); **Shane Huseby**, Panama City, FL (US); **Steven Edward Caskey**, Panama City, FL (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 328 days.

(21) Appl. No.: **13/717,974**

(22) Filed: **Dec. 18, 2012**

(65) **Prior Publication Data**

US 2014/0165896 A1 Jun. 19, 2014

Related U.S. Application Data

(63) Continuation-in-part of application No. 12/927,950, filed on Nov. 30, 2010, now abandoned.

(51) **Int. Cl.**

B63H 11/117 (2006.01)
B63H 11/107 (2006.01)
B63H 25/46 (2006.01)

(52) **U.S. Cl.**

CPC **B63H 11/107** (2013.01); **B63H 25/46** (2013.01)

(58) **Field of Classification Search**

CPC **B63H 11/117**; **B63H 11/113**
USPC **114/150**; **440/40-43**
See application file for complete search history.

(56) **References Cited**

U.S. PATENT DOCUMENTS

5,421,279 A * 6/1995 Louks et al. 114/145 A
6,336,834 B1 * 1/2002 Nedderman et al. 440/43
2012/0285355 A1 * 11/2012 Walkowiak 114/163

* cited by examiner

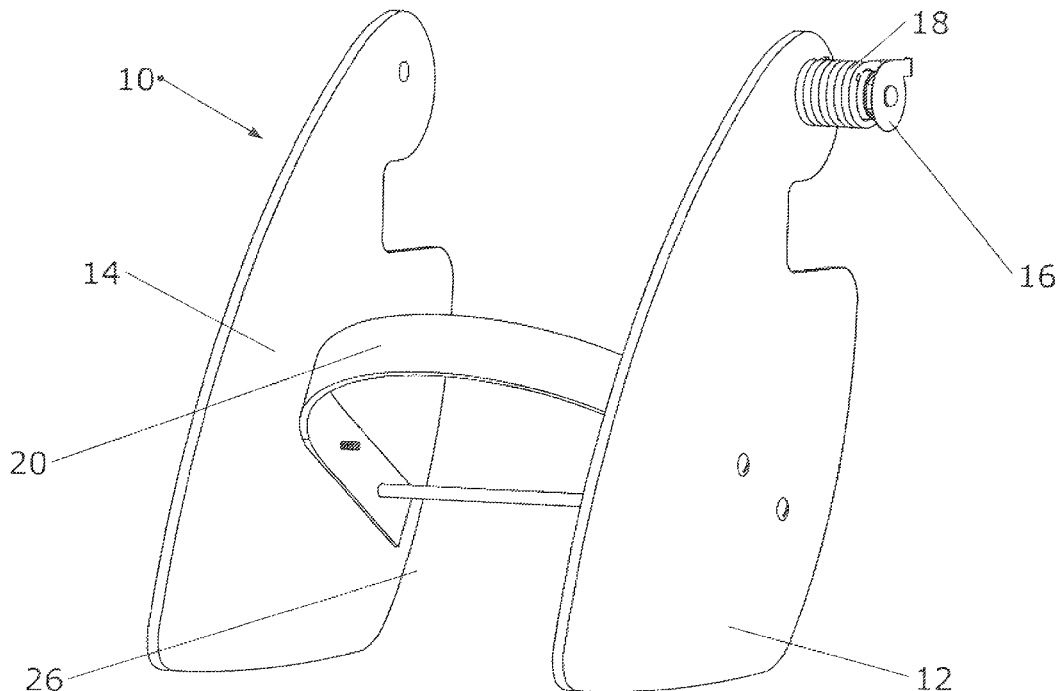
Primary Examiner — Edwin Swinehart

(74) *Attorney, Agent, or Firm* — J. Wiley Horton; Adrienne C. Love

(57) **ABSTRACT**

An auxiliary appendage attachable to the steerable nozzle of an existing water craft. A first and second rudder blade attach to steerable nozzle. The first rudder blade includes a torsion spring providing a downward torsion force. A detent attached to steerable nozzle prevents rudder blades from hyper-extending in the direction of the downward torsion force. Rudder blades are connected by a deflection bar. Deflection bar is angled towards rudder blades. Rudder blades pivot between a downward position to an upward position based on the forces created thereon from both the torsion spring and the movement of the water over the appendage.

3 Claims, 8 Drawing Sheets



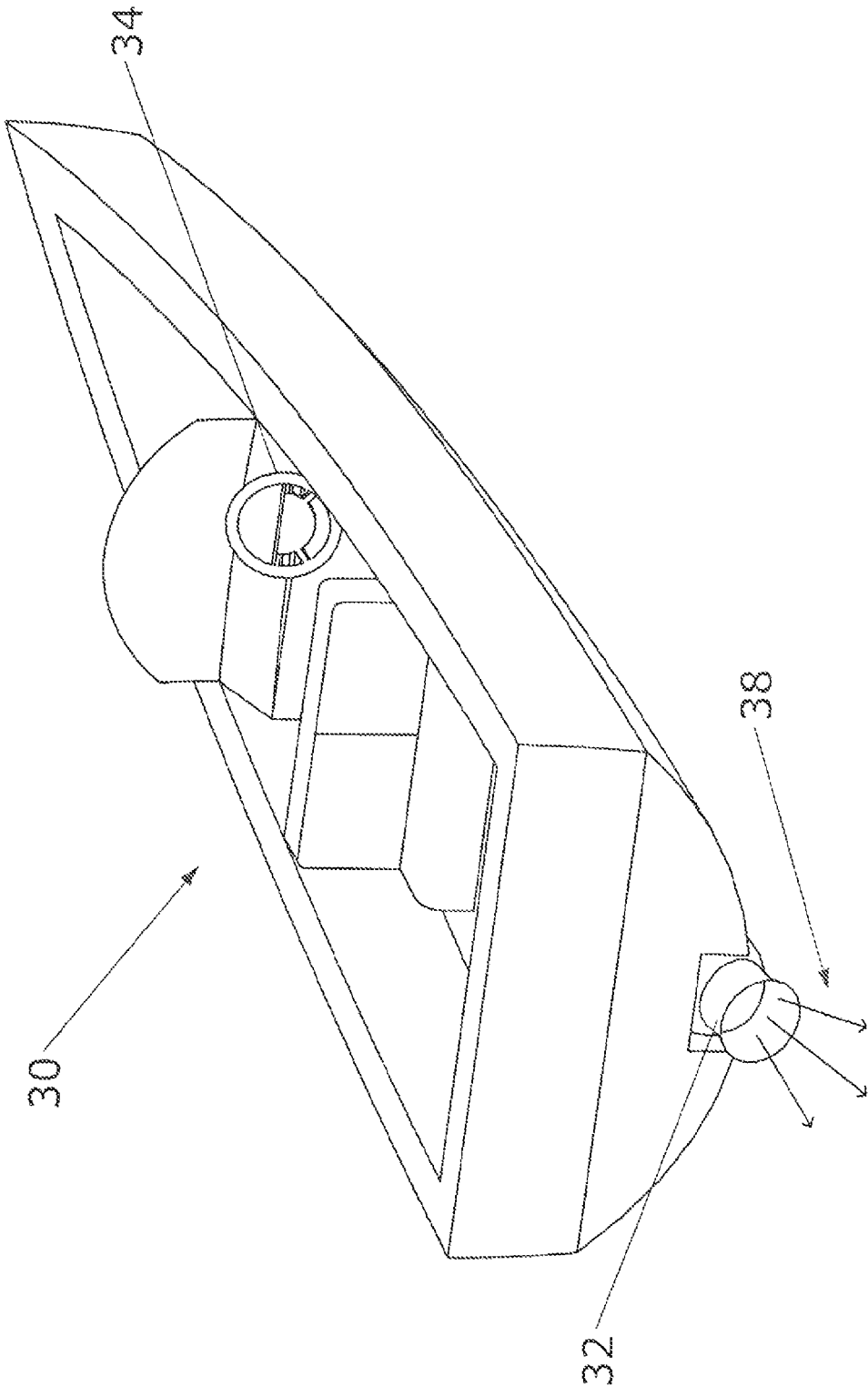
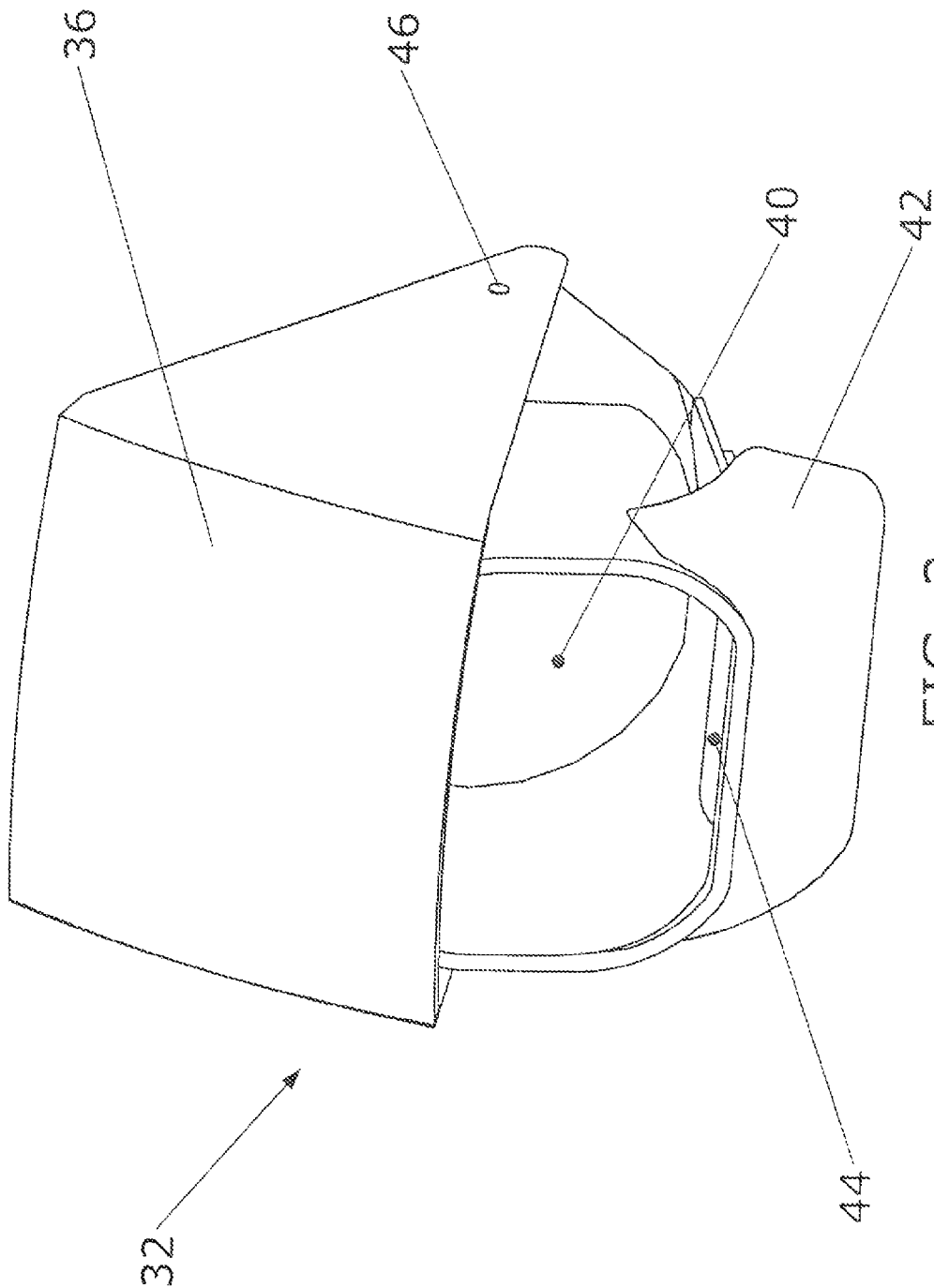


FIG. 1
(PRIOR ART)



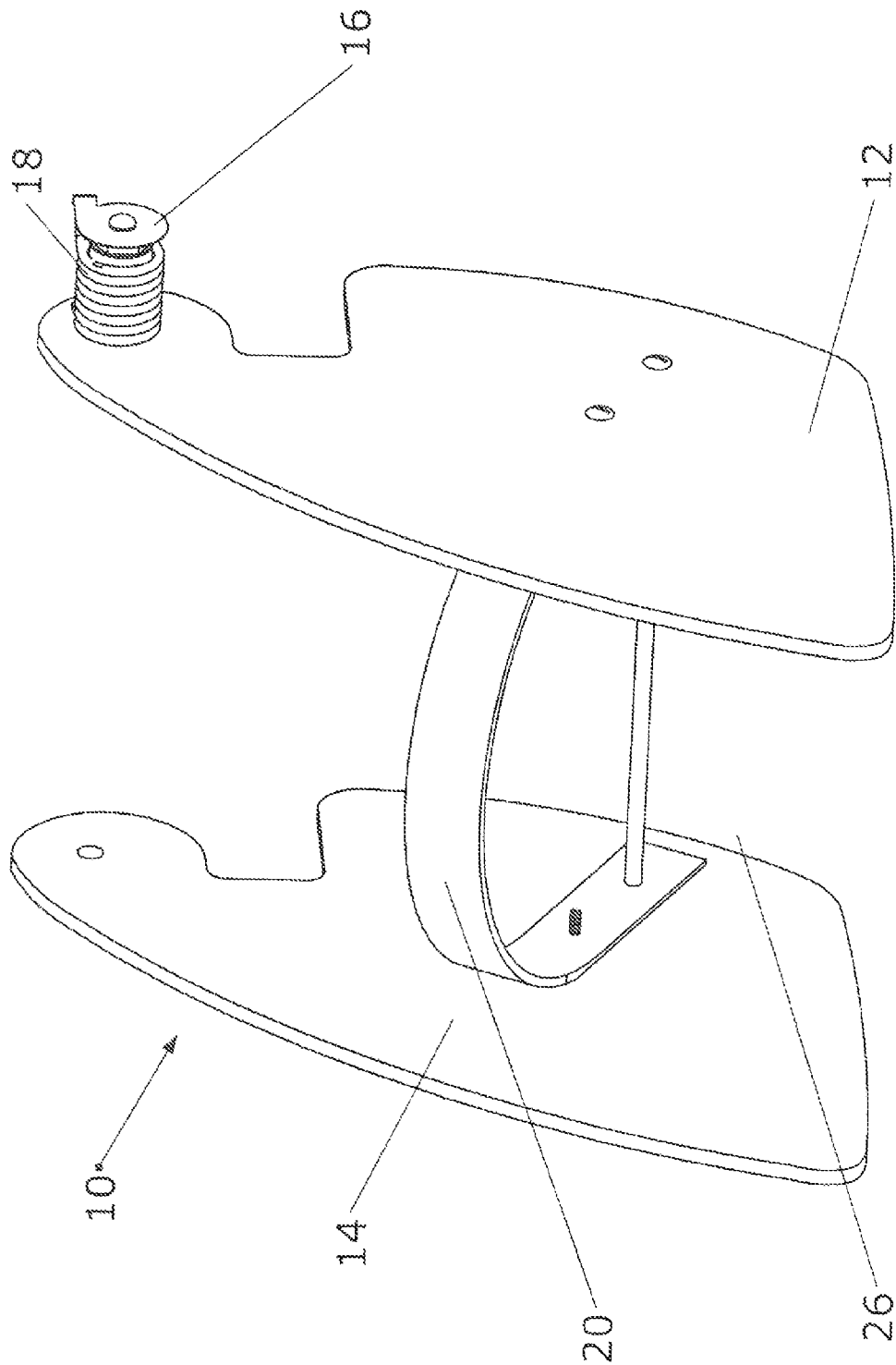
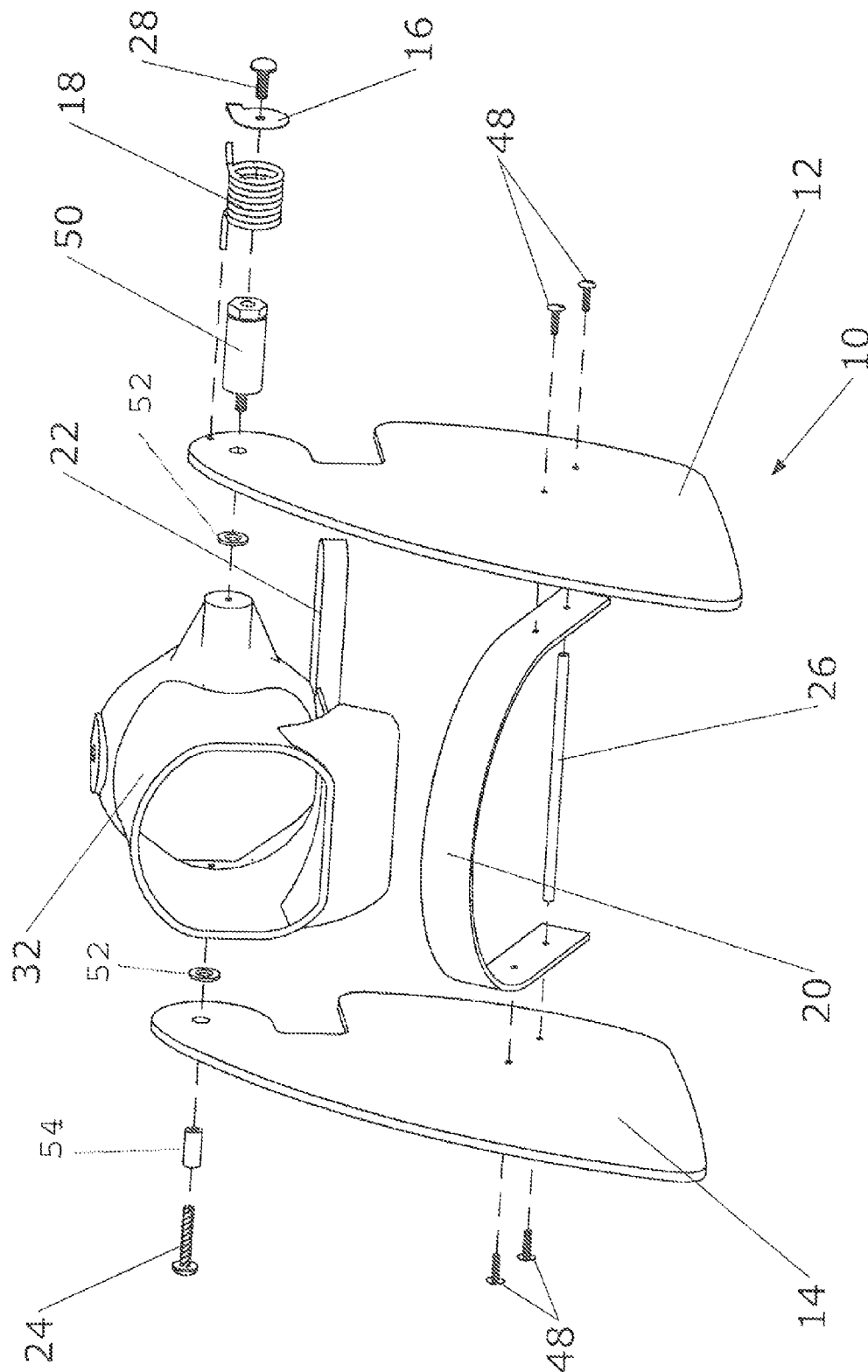


FIG. 3



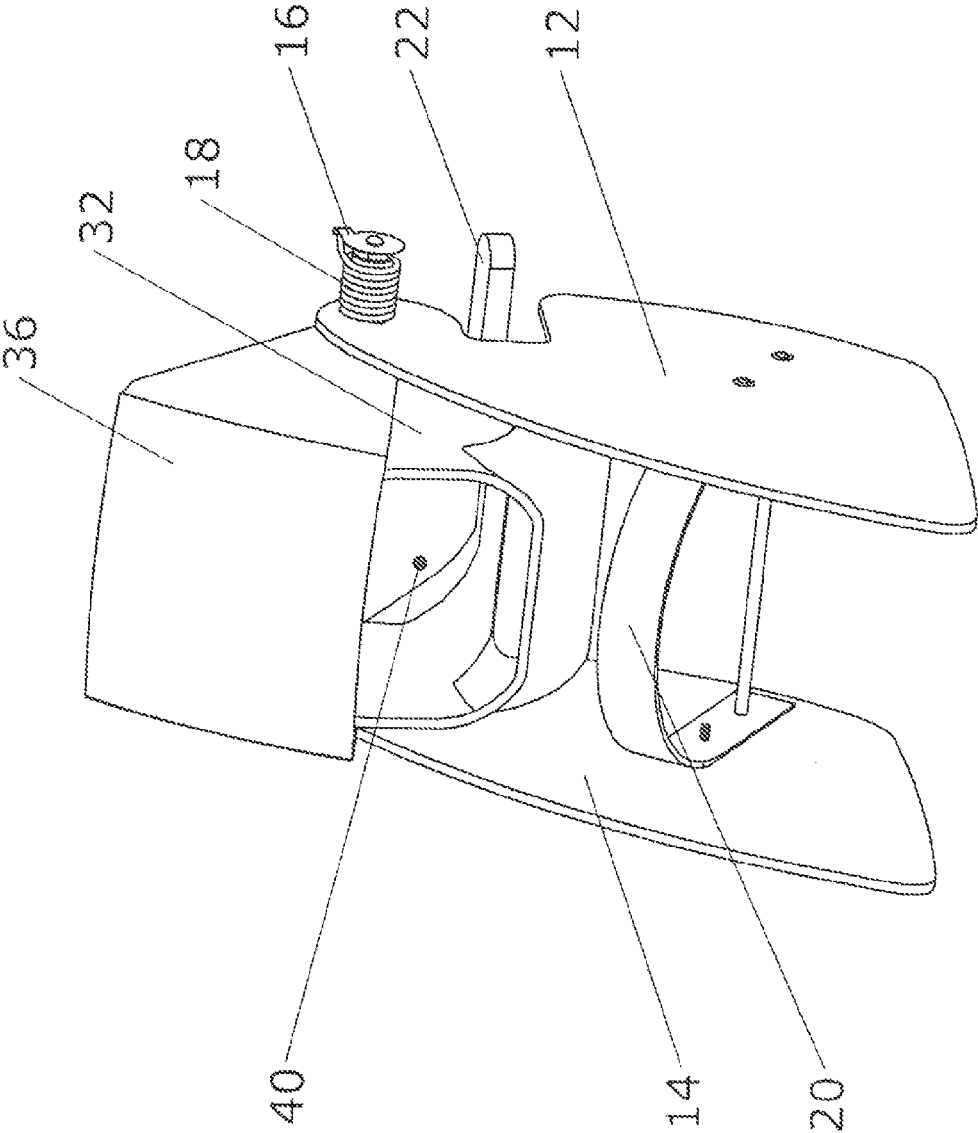


FIG. 5

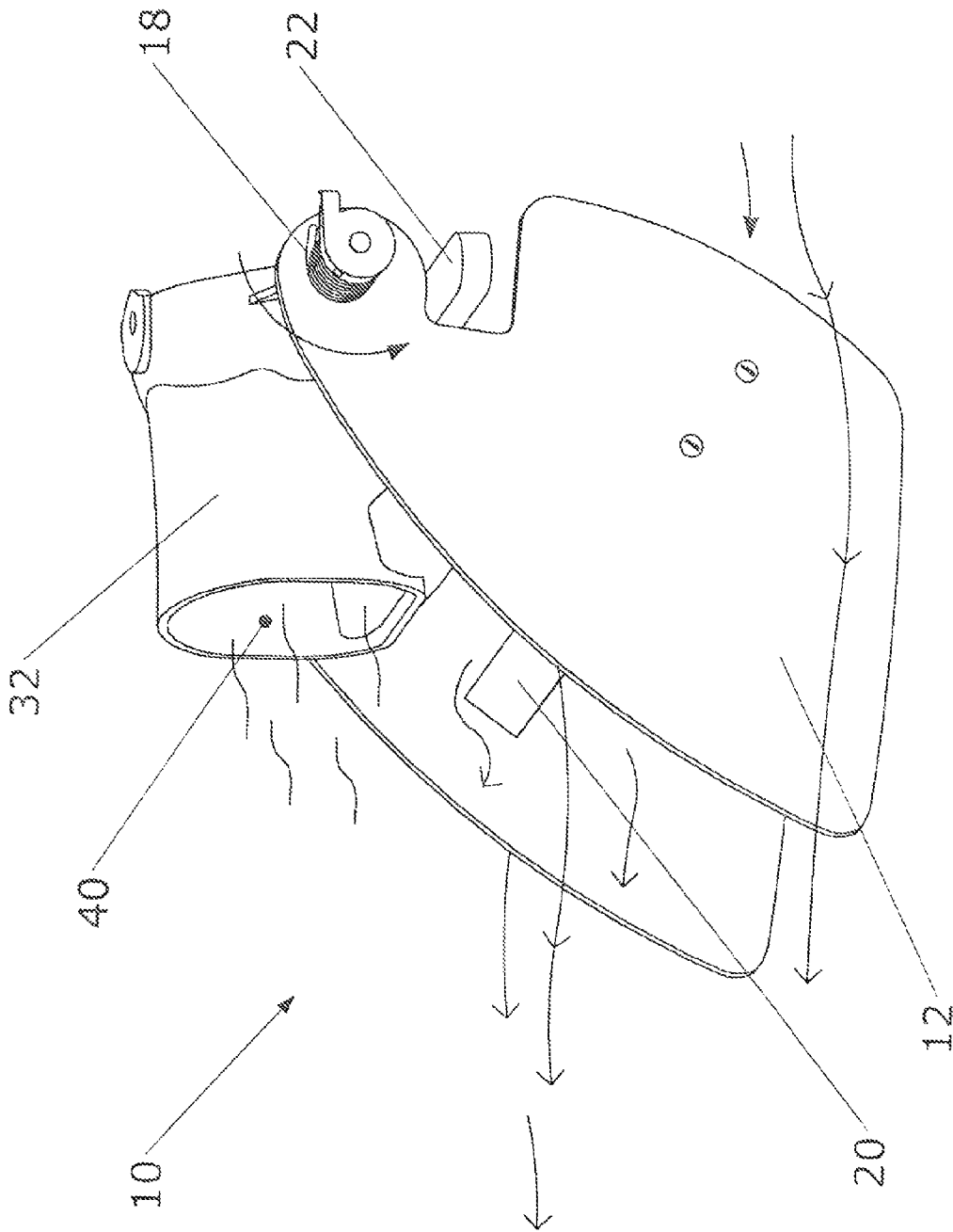
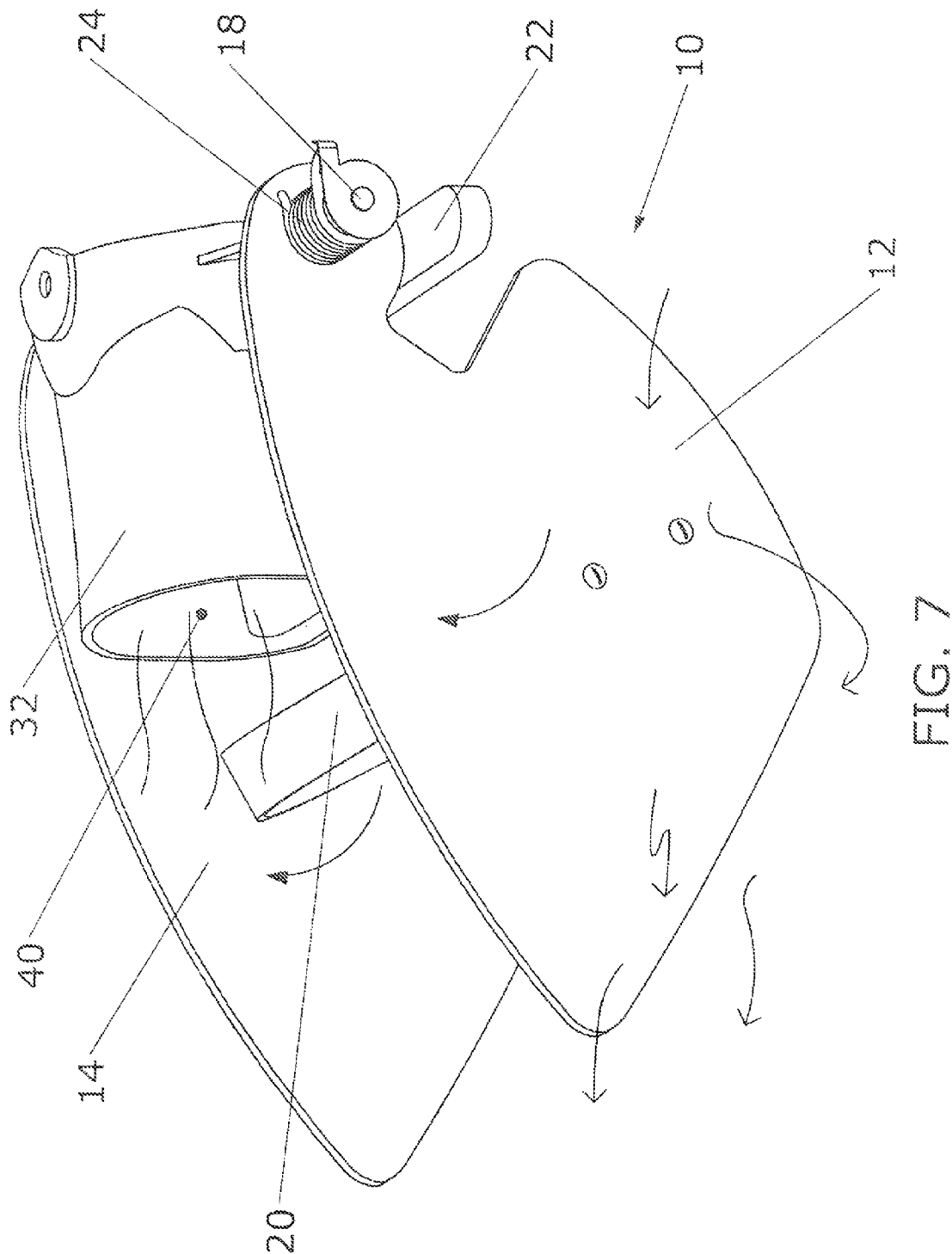


FIG. 6



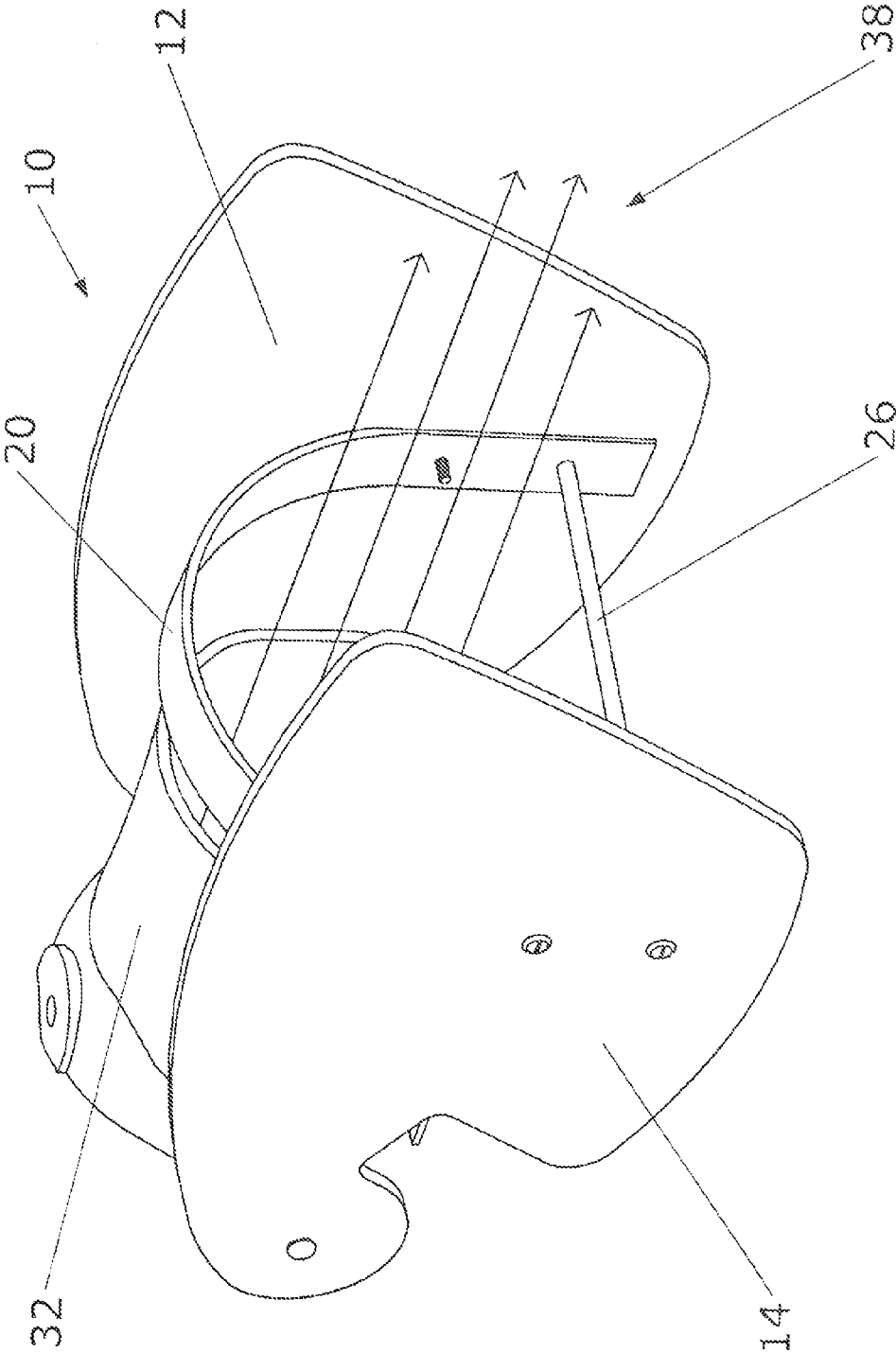


FIG. 8

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CONTROL MECHANISM

CROSS-REFERENCES TO RELATED APPLICATIONS

This application is a continuation-in-part of U.S. application Ser. No. 12/927,950, which lists the same inventor and remains pending.

STATEMENT REGARDING FEDERALLY SPONSORED RESEARCH OR DEVELOPMENT

Not Applicable.

MICROFICHE APPENDIX

Not Applicable

BACKGROUND OF THE INVENTION

1. Field of the Invention

This invention relates to the field of control and steering mechanisms for watercraft vessels. More specifically, the invention comprises an auxiliary appendage for off-plane steering, maneuverability and reactionary turning radius for watercraft vessels which are propelled by water-jet style systems.

2. Description of the Related Art

Currently, the low speed directional change capability of a water-jet driven craft is directly proportional to the force and volumetric flow rate provided by the thrust of the water jet propulsion system. At slow or idle speed, this force is minimal, resulting in sluggish steering response, which reduces control of the craft when idling, docking or in the vicinity of other watercraft. The reduction or minimal ability to control the vessel reduces the capability of the operator to safely maneuver the craft, and has been responsible for numerous accidents, personal injuries, and monetary damages. Because most of the vessels are not equipped with any type of braking system, it is imperative that the operator be in control of the vessel at all times and speeds.

In a 1998 report, the National Transportation Safety Board criticized the basic design of all personal watercraft (PWC), reporting that PWCs have no braking mechanism and that they coast to a stop, and while coasting, there is no turning ability. Many experts concur that what makes PWCs so dangerous is the fact that it will not steer when the operator lets off the throttle. Being rudderless, when the throttle is off, a speeding jet ski or boat cannot stop, nor turn, leaving the operator with no control.

A growing number of safety experts believe that, converse to industry claims, the vehicles themselves, not simply the riders, cause copious injuries and fatalities throughout the U.S. These experts believe those PWCs are a danger, not only to their own riders, but to swimmers, boaters, indeed, anyone who may be in the crafts vicinity. There is much evidence to support that hypothesis.

Water jet propulsion vessels have become popular for recreational water crafts. A prior art water craft 30 is illustrated in FIG. 1. These crafts are typically propelled by two or four stroke gasoline engines in connection with an impeller housed in a tubular chamber, the forward end of which draws in the water and the rearward end which expels it to provide thrust in order to propel the craft or vessel. In most instances, a tubular nozzle (steerable nozzle 32) is attached to the discharge end which pivots from side to side in sync with the steering control 34 to provide steering capability. In fewer

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cases, a deflector plate is provided at the exhaust end to deflect the jet flow to one side or the other of the craft. While a variety of systems have been used in connection with water-jet powered craft, no one system is entirely effective. As an example, there are existing devices which include an integrated rudder system but do not have an effective and efficient means of pivoting the rudders upward out of the water.

Thus, what is needed is a device which can increase control over the vessel at lower speeds without sacrificing control over the vessel at higher speeds. The named Invention addresses many aspects of these concerns, creating a safer, more controlled craft.

BRIEF SUMMARY OF THE INVENTION

The present invention is an auxiliary appendage provided to improve off-plane steering, craft maneuverability and reactionary turning radius. Auxiliary appendage attaches to the steerable nozzle of an existing water craft. A first and second rudder blade attach to steerable nozzle. The first rudder blade includes a torsion spring. Torsion spring provides an adjustable downward torsion force on rudder blades. A detent attached to steerable nozzle prevents rudder blades from hyper-extending in the direction of the downward torsion force. Rudder blades are connected by a deflection bar. Deflection bar is slightly angled towards rudder blades. In operation, at low speeds, the downward torsion force created on rudder blades maintains rudder blades in a position which allows rudder blades to directionally control the craft by pivoting with the steerable nozzle of the water craft. As the water craft moves through the water at increasing speeds, the force created by the moving water on the deflection bar increases and pulls the rudder blades in an upward direction. As the rudder blades pivot about a pivot point, the deflection bar enters jet stream. Jet stream forces deflection bar upward quickly through jet stream. Deflection bar pulls rudder blades into an upward position in which rudder blades no longer affect the directional control of the craft. This action is desirable as it eliminates high stress and sheer loads on the steerable nozzle and jet pump that rigid mounted rudders would induce.

The invention provides all of these features, advantages, and objects along with others that will become apparent with reference to the following description and accompanying drawings.

BRIEF DESCRIPTION OF THE SEVERAL VIEWS OF THE DRAWINGS

FIG. 1 is a perspective view, showing a prior art water craft.

FIG. 2 is a perspective view, showing a prior art steerable nozzle.

FIG. 3 is a perspective view, showing the present invention.

FIG. 4 is an expanded view, showing the present invention prepared to be attached to a prior art steerable nozzle.

FIG. 5 is a perspective view, showing the present invention attached to a prior art steerable nozzle.

FIG. 6 is a perspective view, showing the present invention moving through a body of water at a low speed.

FIG. 7 is a perspective view, showing the present invention moving through a body of water at a moderate speed.

FIG. 8 is a perspective view, showing the present invention moving through a body of water at a high velocity.

REFERENCE NUMERALS IN THE DRAWINGS	
10 auxiliary appendage	12 first rudder blade
14 second rudder blade	16 spring tensioner
18 torsion spring	20 deflection bar
22 detent	24 bolt
26 stabilization bar	28 bolt
30 water craft	32 steerable nozzle
34 steering control	36 reverse gate
38 jet stream	40 exit point
42 thrust reversal channel	44 exit point
46 pivot point	48 bolt
50 threaded bolt	52 washer
54 standoff	

DETAILED DESCRIPTION OF THE INVENTION

A prior art steerable nozzle 32 for watercraft vessels using water-jet propulsion systems is shown in FIGS. 1 and 2. Although steerable nozzle 32 is shown in detail in FIG. 2, the reader will appreciate that steerable nozzle 32 can be any type of prior art steerable nozzle 32 which attaches to a water-jet propelled watercraft. Steerable nozzle 32 is illustrated detached from a watercraft having a reverse gate 36. Reverse gate 36 attaches to nozzle 32 at a pivot point 46 on both sides of nozzle 32. When the watercraft is in reverse the reverse gate 36 covers exit point 40 and directs the jet stream downward through the thrust reversal channel 42 and out exit point 44.

An auxiliary appendage 10 is shown in FIG. 3. Auxiliary appendage 10 is a device which improves the steering and directional control of any water jet powered craft by attachment to an existing steerable nozzle 32 (illustrated in FIG. 2). Auxiliary appendage 10 is generally comprised of first rudder blade 12, second rudder blade 14, adjustable torsion spring 18 and deflection bar 20. First and second rudder blades 12, 14 are connected together by deflection bar 20. First rudder blade 12 includes a torsion spring 18 and a spring tensioner 16. Spring tensioner 16 is used to adjust and maintain the downward force created by the torsion spring on the rudder blades 12, 14. An optional stabilization bar 26 maintains the set distance between the rudder blades 12, 14 and provides structural integrity without interfering with the movement of the rudder blades 12, 14.

FIG. 4 is an expanded view showing the attachment of the auxiliary appendage 10 to an existing steerable nozzle 32. For clarity, the reverse gate has been removed from the figure—however, if the nozzle included a reverse gate, reverse gate would attach directly to the steerable nozzle 32, fitting between steerable nozzle 32 and rudder blades 12, 14. The reader will appreciate that any known method of connecting auxiliary appendage 10 to a prior art steerable nozzle 32 can be used. For example, where existing steerable nozzle 32 does not include bolt holes, auxiliary appendage 10 may be coupled to a bracket which attaches to or fits around steerable nozzle 32. In the alternative, the auxiliary appendage 10 can be fully integrated with the existing water craft 30. Thus, the appendage 10 should not be limited to the present embodiment.

In the present view, the broken lines represent the alignment of the prior art steerable nozzle 32 with the auxiliary appendage 10. Steerable nozzle 32 includes a detent 22 and two bolt holes, which act as the pivot point (typically for attachment of reverse gate shown in FIG. 2). First rudder blade 12 fits into position beside steerable nozzle 32 such that detent 22 extends through first rudder blade 12. Washers 52 can be placed between steerable nozzle 32 and first and second rudder blades 12, 14 (or reverse gate and rudder blades).

A threaded bolt 50 attaches first rudder blade 12 to steerable nozzle 32. Threaded bolt 50 includes a central threaded void. Torsion spring 18 fits around threaded bolt 50 and hooks into first rudder blade 12. Spring tensioner 16 hooks onto torsion spring 18 while bolt 28 holds spring tensioner 16 in a set position. Bolt 28 is placed through spring tensioner 16 into the central threaded void of threaded bolt 50. As bolt 28 is tightened, spring tensioner 16 is set at the desired tension, which controls the downward force that tension spring 18 exerts on first and second rudder blades 12, 14. Second rudder blade 14 is attached to steerable nozzle 32 parallel to first rudder blade 12. Bolt 24 fits through second rudder blade 14, through washer 52 into steerable nozzle 32. Additionally, a standoff 54 can be used to act as a pivot point for second rudder blade 14. Deflection bar is attached to first and second rudder blades 12, 14 by bolts 48. Likewise, an optional stabilization bar 26, attaches to both first and second rudder blades 12, 14 at bolts 48, as shown. Washers should be used in conjunction with bolts 28 to distribute the load on the bolts and act as spacers.

Of note, auxiliary appendage 10 can be attached in the same manner with a prior art reverse gate 36 and thrust reversal channel included on the steerable nozzle 32, as shown in FIG. 5. Auxiliary appendage is shown in a downward position. In such an embodiment, first and second rudder blades 12, 14 would be positioned on either side of reverse gate 36. Torsion spring 18 maintains a downward torsion force on rudder blades 12, 14. The torsion spring 18 is adjustable by repositioning spring tensioner 16. Thus, the downward torsion force can be adjusted to increase or decrease the downward force with relation to the pivot point of reverse gate 36 for precise adjustment for a multitude of water-jet driven vessels. Detent lever 22 on steerable nozzle 32 prevents rudder blades 12, 14 from hyper-extending in the same direction of the downward torsion force. Deflection bar 20 connected to the lower end of first and second rudder blades 12, 14 is slightly angled towards rudder blades 12, 14, as illustrated.

In operation, auxiliary appendage 10 provides supplemental rudders while the water craft is moving at a low velocity while automatically repositioning the rudders 12, 14 at high velocities. This action is further illustrated in FIGS. 6, 7 and 8.

In FIG. 6 auxiliary appendage 10 is attached to a prior art steerable nozzle 32. As the water jet powered craft moves through the water at low velocities the first and second rudder blades 12, 14 move smoothly through the water, allowing the rudder blades 12, 14 to effectively control the watercraft. The force downward on torsion spring 18 (shown as a curved arrow) is greater than the upward force of the water on deflection bar 20 (movement of water is shown as a series of arrows). Therefore, the first and second rudder blades 12, 14 remain in a downward position when the water craft maintains a slow speed. At slow moving speeds the water's laminar flow about the first and second rudder blades 12, 14 allows for increased directional control of the water craft.

As the water craft begins to increase in speed, the jet stream 38 becomes more forceful, as illustrated in FIG. 7. As the water moves over the auxiliary appendage 10 at increased speeds, the turbulent water flow increases causing an increased upward force on deflection bar 20. This upward force begins to exceed the downward force created by torsion spring 18. As the deflection bar 20 is forced upward, the first and second rudder blades 12, 14 pivot upward.

At high velocities, turbulent flow increases and laminar flow decreases around the rudder blades 12, 14. Thus, as the watercraft increases in speed the rudder blades become ineffective and unpredictable. Additionally, if the rudder blades

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remain submerged within the water, the blades, nozzles and linkages experience greatly increased stress loads and sheer loads. It is therefore desirable that at high speeds first and second rudder blades 12, 14 lift out of the water such that the rudders no longer affect the steering of the water craft as shown, in FIG. 8. Thus, in FIG. 8, auxiliary appendage 10 is shown in an upward position.

Deflection bar 20 moves upward slowly at first as the upward force from the water flow on deflection bar matches and begins to exceed the downward force created by torsion spring 18 on the rudder blades 12, 14. When deflection bar 20 enters jet stream 38, deflection bar 20 is angled such that the upward force of the jet stream 38 will cause deflection bar 20 to quickly move upward through jet stream 38. Deflection bar 20 clears steerable nozzle 32 (and reverse gate 36, if relevant) simultaneously pulling rudder blades 12, 14 out of the water. As illustrated, optional stabilization bar 26 does not enter jet stream 38, remaining underneath jet stream 38.

At high speeds the water craft planes and the steering is well controlled by the expulsion of water from the water jet through steerable nozzle 32. If the user turns the craft the steerable nozzle 32 turns and the propulsion of water effectively controls the forward direction of the craft. As the watercraft slows down, the control over the steering of the craft via the steerable nozzle 32 decreases. The downward rotational force created by torsion spring 18 becomes greater than the upward force on deflection bar 20 as the speed of the craft decreases. This causes the rudder blades 12, 14 to submerge in the water once again and provide effective control over the watercraft at low speed. This can be extremely beneficial if the user must cut off power to the engine and quickly steer the water craft in a particular direction.

The preceding description contains significant detail regarding the novel aspects of the present invention. It is should not be construed, however, as limiting the scope of the invention but rather as providing illustrations of the preferred embodiments of the invention. As an example, any known manner of attaching the directional nozzle to the watercraft can be utilized. Thus, the scope of the invention should be fixed by the following claims, rather than by the examples given.

We claim:

1. An auxiliary appendage for attachment to a steerable nozzle for accepting a jet stream said attachment comprising:
- a. a first rudder blade coupled to said steerable nozzle;

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- b. second rudder blade coupled to said steerable nozzle;
- c. wherein said first rudder blade is parallel to said second rudder blade;
- d. a deflection bar coupled to said first rudder blade and said second rudder blade;
- e. a torsion spring attached to at least one rudder blade, wherein said torsion spring is capable of providing downward torsion force on said first rudder blade and said second rudder blade;
- f. wherein said deflection bar is capable of providing an upward force on said first rudder blade and said second rudder blade opposite said downward torsion force;
- g. wherein said auxiliary appendage pivots between a downward position and an upward position;
- h. a threaded bolt having a central threaded void for attachment of said first rudder blade to said steerable nozzle;
- i. wherein said torsion spring around said threaded bolt and hooks into said first rudder blade; and
- j. wherein a spring tensioner is connected to said torsion spring and held in place by a second bolt.
2. The attachment of claim 1, wherein said second rudder blade is connected to said steerable nozzle by a third bolt.
3. An auxiliary attachment for attachment to a steerable nozzle for accepting a jet stream said attachment comprising:
- a. a first rudder blade coupled to said steerable nozzle;
- b. a second rudder blade coupled to said steerable nozzle;
- c. a deflection bar positioned between said first rudder blade and said second rudder blade;
- d. wherein said first rudder blade and said second rudder blade are held in a downward position by a downward torsion force;
- e. wherein said deflection bar is capable of providing an upward force on said first rudder blade and said second rudder blade opposite said downward torsion force;
- f. torsion spring, which is capable of providing variable degrees of said downward torsion force in conjunction with a spring tensioner;
- g. a threaded bolt having a central threaded void for attachment of said first rudder blade to said steerable nozzle;
- h. wherein said torsion spring fits around said threaded bolt and hooks into said first rudder blade; and
- i. wherein a spring tensioner is connected to said torsion spring and held in place by a second bolt.

* * * * *



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Attorney at Law

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adrienne@penningtonlaw.com

July 8, 2016

Via Certified U.S. Mail

Jeff Walkowiak
Cobra Jet Steering
5005 93rd Avenue North
Pinellas Park, Florida
Email: jeff@cobrajetsteering.com

RE: Notice to Cease and Desist

Dear Mr. Walkowiak:

I am an attorney for JetBoatPilot, LLC, (hereinafter "Jet Boat"), a Florida Limited Liability Company. Jet Boat is the owner of US Patent No. 9,359,054 (the '054 Patent). It has come to our attention that Cobra Jet Steering (hereinafter "Cobra Jet"), is infringing certain claims of the '054 Patent, as further described below. Jet Boat therefore demands that Cobra Jet immediately cease its infringing activity, desist from such infringing activity in the future and comply with Jet Boat's other requirements set out in this letter. A copy of the patent is enclosed for your reference.

We purchased your company's "Cobra Venom Ultimate" (see attached website screen shot) and we analyzed and compared it against the '054 Patent. Based on our analysis and comparison, the "Cobra Venom Ultimate" infringes all three claims of the '054 Patent in violation of Section 271 of the Patent Act. Every limitation of the '054 patent claims is met by the Cobra Jet's "Cobra Venom Ultimate". In fact, the "Cobra Venom Ultimate" is identical to the device disclosed and claimed in the '054 Patent.

Patent infringement is a serious matter and Jet Boat expects third parties to respect its patent rights. The purpose of this letter is to inform you that your described business practices are disruptive to Jet Boat. You are hereby instructed to immediately cease and desist any further use of your copied product.

Jeff Walkowiak
Cobra Jet Steering
July 8, 2016
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Jet Boat therefore demands that Cobra Jet:

1. Immediately cease and desist from all further activity that infringes the claims of the '054 Patent.
2. Provide Jet Boat with sufficient information to determine the number of all infringing products made, used, offered for sale, sold or imported and all proceeds therefrom and pay suitable damages for the infringement.
3. Promptly provide Jet Boat with written confirmation that Cobra Jet will comply with these demands.

Cobra Jet is specifically advised that any failure or delay in complying with these demands may compound the damages for which Cobra Jet may be liable. If Jet Boat does not receive a satisfactory response to these demands by the close of business on Friday, July 15, 2016, Jet Boat is prepared to take all steps necessary to protect its valuable intellectual property rights, without further notice to Cobra Jet.

The above is not an exhaustive statement of all the relevant facts and law. Jet Boat expressly reserves all of its legal and equitable rights and remedies, including the right to seek injunctive relief and recover monetary damages.

Should you or your representative wish to discuss the above-mentioned concerns for possible mutual resolution or should you have any questions regarding the above, you may contact me directly.

Sincerely,

Adrienne Love

Adrienne Love

Attachment
ACL.rtf