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DWF/JSJ

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Leisure Incorporated,)	
)	Case No. _____
Plaintiff,)	
)	JURY TRIAL DEMANDED
v.)	
)	
Horseshoe Golf, LLC,)	
and)	
Ben Knapp, Individual,)	
)	
Defendants.)	

COMPLAINT

Plaintiff, LEISURE INCORPORATED (hereinafter "LEISURE" or "Plaintiff"),
for its complaint against HORSESHOE GOLF, LLC and BEN KNAPP, INDIVIDUAL
(hereinafter "HORSESHOE", "KNAPP", or "Defendants") states as follows:

Parties

1. Plaintiff LEISURE is a Minnesota Corporation having its principal place of business at 6811 Flying Cloud Drive, Eden Prairie, Minnesota 55344.
2. Upon information and belief, Defendant HORSESHOE is a Limited Liability Company organized under the laws of the State of Michigan, having its principal place of business at 4950-J Plainfield Avenue Northeast, Grand Rapids, Michigan 49525.
3. Upon information and belief, Defendant KNAPP is an individual residing at 3663 Ivy Drive Northeast, Grand Rapids, Michigan 49525.

SCANNED
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U.S. DISTRICT COURT MPLS

Jurisdiction and Venue

4. This action arises under the patent laws of the United States, 35 U.S.C. §100 et seq.

5. This Court has federal question jurisdiction pursuant to 28 U.S.C. §§1331 and 1338(a). Venue is proper in the United States District Court for the District of Minnesota pursuant to 28 U.S.C. §§1391 and 1400(b).

6. Upon information and belief, Defendants have sold and/or offered for sale products which Plaintiff alleges infringe the patent at issue in this case within the territorial limits of the United States District Court for the District of Minnesota. This Court thus has personal jurisdiction over Defendants, and venue is proper in this District.

Patent Infringement

7. LEISURE incorporates by reference the allegations set forth in paragraphs 1-6 of this Complaint.

8. On May 1, 2001, United States Design Patent No. D441,414 (the '414 Patent) was duly and lawfully issued to LEISURE. Generally, the '414 Patent relates to and covers a shuttlecock golf ball device. A true and correct copy of the '414 Patent is attached hereto as Exhibit A.

9. LEISURE is the current owner of all rights, title, and interest in the '414 Patent. LEISURE has the right to assert all causes of action arising under the '414 Patent, including the right to sue for infringement thereof, to seek to prevent further infringement, and to collect all damages for past infringement.

10. Defendants have willfully infringed and/or induced infringement of, and are currently willfully infringing and/or inducing infringement of the '414 Patent in the

United States by making, using, selling and/or offering for sale products which infringe the '414 Patent literally or under the Doctrine of Equivalents. Such infringing products include Defendants' "Big Birdie Golf" and "Big Birdie Golf Balls".

11. LEISURE has been and will continue to be damaged by Defendants' infringement of the '414 Patent and, upon information and belief, such infringement will continue unless Defendants are enjoined from further infringement. The infringement of the '414 Patent has caused damage to LEISURE's business, and Defendants have obtained profit LEISURE would have had but for the infringement.

Prayer For Relief

Wherefore, Plaintiff LEISURE demands judgment in its favor and against Defendants as follows:

A. A permanent injunction for the life of the '414 Patent against continued infringement thereof by Defendant, its officers, agents, servants, employees, attorneys, and those controlling, controlled by, or in active participation with them pursuant to 35 U.S.C. §283.

B. An award of damages adequate to compensate LEISURE for the infringement of the '414 Patent, and that such damages be trebled due to the willful nature of Defendants' conduct as provided in 35 U.S.C. §284.

C. An award of reasonable attorney's fees as provided in 35 U.S.C. §285.

D. An award of such other and further legal and equitable relief as the Court deems proper.

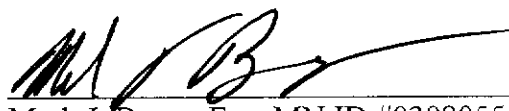
DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury for all issues triable to a jury pleaded herein.

Respectfully submitted,

HAUGEN LAW FIRM PLLP

Date: June 14, 2011



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