

4. On information and belief, defendant Greenkeepers, Inc. is a corporation organized under the laws of the Commonwealth of Pennsylvania having its principal place of business at 1836 Stout Drive, Unit 16, Warminster, PA 18974.

JURISDICTION AND VENUE

5. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Greenkeepers of Delaware LLC, because Greenkeepers of Delaware, LLC is a Delaware company, and has had continuous and systematic contacts with this judicial district.

7. This Court has personal jurisdiction over Greenkeepers, Inc., because, on information and belief, Greenkeepers, Inc. has had continuous and systematic contacts within this judicial district, has sold or offered to sell infringing products within Delaware, has affiliated itself with a Delaware company, and has shipped or transferred title to its products within Delaware.

8. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c), and 1400(b).

BACKGROUND

9. On November 2, 2004, the '608 patent, entitled "Shoe Cleats," was duly and legally issued to Trisport Ltd., as assignee. A true and correct copy of the '608 patent is attached hereto as Exhibit A. Plaintiff owns all right, title and interest to the '608 patent, including the right to sue for infringement thereof.

FIRST CLAIM FOR RELIEF

INFRINGEMENT OF THE '608 PATENT

10. Plaintiff incorporates by reference paragraphs 1 through 9.

11. On information and belief, Defendants have been and are infringing the '608 patent by making, using, offering for sale, or selling infringing golf shoe cleats.

12. On information and belief, Defendants also have been and are contributorily infringing and/or actively inducing others to infringe the '608 patent.

13. On information and belief, Defendants were aware of the existence of the '608 patent and their infringement of the '608 patent has been intentional, deliberate, and willful. This is an exceptional case.

14. On information and belief, Defendants will continue to infringe, contributorily infringe, and/or actively induce others to infringe the '608 patent unless and until they are enjoined by this Court.

15. Defendants' infringing activities will irreparably harm Plaintiff unless enjoined by this Court. Plaintiff does not have an adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Trisport respectfully requests the following relief:

- A. A judgment that Defendants have infringed the '608 patent;
- B. A permanent injunction, enjoining Defendants, their officers, agents, servants, employees, and attorneys and other persons who are in active concert or participation with them from infringing the '608 patent;
- C. An order awarding damages in an amount sufficient to compensate Trisport for Defendants' infringement of the '608 patent, but not less than a reasonable royalty;
- D. An order awarding prejudgment interest to Trisport pursuant to 35 U.S.C. §284;
- E. An order awarding increased damages, pursuant to 35 U.S.C. §284;

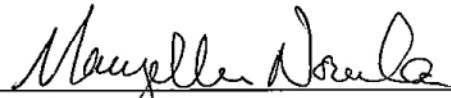
F. A declaration that this case is exceptional pursuant to 35 U.S.C. § 285 and an award of attorneys' fees and costs; and

G. Such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Trisport hereby demands a jury trial on all issues triable of right by a jury.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP



Jack B. Blumenfeld (#1014)
Maryellen Noreika (#3208)
Paul Saindon (#5110)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
mnoreika@mnat.com
Attorneys for Trisport, Ltd.

July 29, 2008

