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12	UNITED STATES DISTRICT COURT					
13	UNITED STATES DISTRICT COURT					
14	DISTRICT OF NEVADA					
15	COMPUTERIZED SCREENING, INC.,	CASE NO.				
16	Plaintiff,	PLAINTIFF COMPUTERIZED SCREENING, INC.'S COMPLAINT				
17	v.					
18	STAYHEALTHY, INC.	JURY TRIAL DEMANDED				
19	Defendant.					
20						
21						
22						
23	Plaintiff Computerized Screening, Inc. ("CSI") states as follows for its Complaint against					
24	Stayhealthy, Inc. ("Stayhealthy"):					
25	1. This is an action arising under the patent laws of the United States, 35 U.S.C. §§ 1					
26	et seq., for infringement of U.S. Patent No. 6,692,436 (the "'436 Patent"), attached herein as					
27	Exhibit 1.					
28						
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-1-

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

THE PARTIES

- 3. Plaintiff CSI is a Nevada corporation with its principal place of business at 9550 Gateway Drive, Reno, Nevada 89521.
- 4. On information and belief, Defendant Stayhealthy is a Delaware corporation with its principal place of business at 717 S. Myrtle Avenue, Monrovia CA 91016.

JURISDICTION AND VENUE

- 5. On information and belief, Stayhealthy is subject to personal jurisdiction in this district because it has used, offered for sale, and/or sold infringing products in this district, and has contributed to or induced third-parties to infringe in this district.
- 6. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 (b), (c) and 1400(b) because a substantial part of the events giving rise to CSI's claims occurred in this district and Stayhealthy resides in this district as it is a corporation subject to personal jurisdiction in this district.

BACKGROUND

- 7. Charles P. Bluth ("Mr. Bluth"), founder of CSI in 1978, is a co-inventor of the '436 Patent. Mr. Bluth is a serial entrepreneur who has owned and operated twenty-two businesses in Nevada and other states.
- 8. CSI is an FDA registered Class II medical manufacturer of patient interactive kiosks that integrate non-invasive and invasive preventive health screening technology and telemedicine solutions. CSI's kiosks provide accurate blood pressure and heart rate testing, complete fitness evaluation, drug encyclopedia and compatibility, information on local health care providers from physicians to hospitals to crisis centers, create personal health records and electronic medical records, and can track an individual's health status on a daily, weekly, or monthly basis. The kiosks provide handicap accessible seating and a weight scale integrated into the seat for weight measurement.

under the doctrine of equivalents, by making, having made, using, selling, offering for sale,

and/or importing, without authority, products, including but not limited to the Healthcenter

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27

28

Kiosk.

28 system

- 21. Stayhealthy has contributed to and/or induced, and continues to contribute to and/or induce, the infringement of the '436 Patent by selling, offering to sell, and/or importing into the United States infringing health monitoring kiosks, with the direct infringement being accomplished by end users of at least the Healthcenter kiosks. Stayhealthy has encouraged, trained, and instructed customers and end users to operate health monitoring kiosks to measure blood pressure or weight and transmit the data through a network to store the measurement data in remote data storage. Stayhealthy knew that these acts constitute infringement of the '436 Patent. Further, the Stayhealthy kiosks have no substantial non-infringing purpose.
 - 22. Stayhealthy's conduct has damaged and will continue to damage CSI.
- 23. Stayhealthy's infringement has been in willful disregard of CSI's patent rights, making this case exceptional under 35 U.S.C. § 285.
- 24. CSI will suffer further damages and irreparable injury unless and until Stayhealthy is enjoined by this Court from continuing such infringement.

PRAYER FOR RELIEF

WHEREFORE, CSI respectfully requests that this Court enter judgment in its favor and against Stayhealthy and enter an Order granting the following relief:

- 1. Declare that the Stayhealthy has infringed, contributed to the infringement of, and/or induced the infringement of the '436 Patent;
- 2. Permanently enjoin and restrain Stayhealthy and all others with actual notice of the order from further acts infringing the '436 Patent, including making, importing, using, selling, offering for sale, contributing to the infringement of, and/or inducing the use of all products and/or systems found to infringe the '436 Patent;
- 3. Require Stayhealthy to send a copy of any judgment or injunction in this case in favor of CSI to each licensee, sublicensee, distributor, person, or entity to whom Stayhealthy sells, has sold, or has otherwise distributed products and/or systems found to infringe the '436 Patent;
- 4. Order the impounding and destruction of all of Stayhealthy products and/or systems that infringe the '436 Patent;

1	5. Award CSI patent infringement damages and pre-judgment interest pursuant to 35				
2	U.S.C. § 284;				
3	6. Order an accounting of Stayhealthy's profits resulting from sales of its products				
4	and/or systems that infringe the '436 Patent;				
5	7. An Order trebling damages for willful patent infringement pursuant to 35 U.S.C.				
6	§ 284;				
7	8. A finding that this case is exceptional pursuant to 35 U.S.C. § 285 and an Order				
8	granting reasonable costs and attorneys' fees; and				
9	9. Award such other relief as the Court may deem appropriate and just under the				
10	circumstances				
11	JURY DEMAND				
12	Plaintiff demands a trial by jury of all claims and all issues triable as of right by jury in				
13	this action.				
14	DATED this 2	23rd day of July, 2013.		ARMSTRONG TEASDALE LLP	
15		В	By:	/s/Jennifer E. Hoekel	
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