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8 *Attorneys for Plaintiff*  
 9 *TZU Technologies, LLC,*

10 **UNITED STATES DISTRICT COURT**  
 11  
 12 **CENTRAL DISTRICT OF CALIFORNIA**

14	TZU Technologies, LLC, a California	)	Case No. 2:15-cv-04917
15	limited liability corporation,	)	
16	Plaintiff,	)	<b>COMPLAINT FOR PATENT</b>
17	v.	)	<b>INFRINGEMENT AND</b>
18		)	<b>PERMANENT INJUNCTION</b>
19	Internet Services, LLC, a North Carolina	)	<b>DEMAND FOR JURY TRIAL</b>
20	limited liability company, and WMM	)	
21	Holdings, LLC, Nevada limited liability	)	
22	company,	)	
23	Defendants.	)	

1 Plaintiff Tzu Technologies LLC, (“TZU”), by and through its undersigned  
2 counsel, for its Complaint against Defendants Internet Services LLC and WMM  
3 Holdings LLC (collectively, “RT” or “Defendants”) makes the following allegations.  
4 These allegations are made upon information and belief.

5 **JURISDICTION AND VENUE**

6 1. This is an action for patent infringement arising under the patent laws of  
7 the United States, including 35 U.S.C. §§ 271, 281, and 283-285.

8 2. This Court has subject matter jurisdiction over this action pursuant to 28  
9 U.S.C. § § 1331 and 1338(a) because it arises under United States Patent law.

10 3. Venue is proper in this District pursuant to 28 U.S.C. §1391(b) and (c).  
11 Defendants are subject to this Court’s personal jurisdiction in the acts and transactions  
12 include the import of property identified herein through the State of California.  
13 Furthermore, Defendants, inter alia, make, sell and distribute adult oriented toys, adult  
14 oriented video and adult oriented real time services over the Internet throughout the  
15 United States, including sales targeted to the State of California, thereby purposefully  
16 availing themselves of the benefits of the state.

17 **THE PARTIES**

18 4. TZU Technologies is a limited liability company organized under the  
19 laws of the State of California and has an office and principal place of business at 35  
20 Hugus Ally, Suite 210, Pasadena, California 91103.

21 5. Defendant Internet Services LLC is a North Carolina limited liability  
22 company having a place of business at 500 Archdale Dr., Charlotte, NC 28217.

23 6. Defendant WWM Holdings LLC is a Nevada limited liability company  
24 having a place of business at 500 Archdale Dr., Charlotte NC 2817.

25 **FACTS**

26 7. TZU Technologies is the owner, by assignment, of U.S. Patent No.  
27 6,368,268 (“the ‘268 Patent”), entitled “Method and device for interactive virtual  
28 control of sexual aids using digital computer networks,” which was duly and legally

1 issued on April 9, 2002, by the United States Patent and Trademark Office. A copy  
2 of U.S. Patent No. 6,368,268 is attached to this complaint as **Exhibit A**.

3 8. The claims of the '268 Patent are valid and enforceable.

4 9. Defendants sells or has sold to its customers in the United States the  
5 "Real Touch Straight Device," "Real Touch Gay Device," and "RealTouch DVD's"  
6 directly on their website [www.realtouch.com](http://www.realtouch.com) and through distributors. Defendants  
7 also sell video on demand services on [www.realtouchvideos.com](http://www.realtouchvideos.com) and real-time digital  
8 sex services on [www.realtouchinteractive.com](http://www.realtouchinteractive.com) to be used in conjunction with the  
9 "RealTouch joystick" product by their models on [www.realtouchinteractive.com](http://www.realtouchinteractive.com)  
10 (collectively "Realtouch Product Family"). A listing of the "Real Touch Straight  
11 Device" and "Real Touch Gay Device" product on Defendants' website (currently not  
12 in stock) and Real Touch encoded DVD products is attached herewith as **Exhibit B**. A  
13 listing of the "Real touch video on demand services" is attached herewith as **Exhibit**  
14 **C**. A listing of the Real Touch interactive services and a "Real Touch joystick" used  
15 by models on [www.realtouchinteractive.com](http://www.realtouchinteractive.com) is attached herewith as **Exhibit D**.

16 10. The Real Touch Product Family is composed of stimulation systems  
17 having a hand-operable input device for generating a command signal in response to  
18 an input from a first user. A first user interface is connected to the said input device,  
19 for generating a control signal based upon the command signal. A second user  
20 interface is remotely located from first user interface and a second user interface  
21 receives the control signal. A stimulation device receives a control signal from the  
22 second user interface. The stimulation signal imparts stimulation to a user in response  
23 to the control signal.

24 11. The Real Touch Product Family of products infringe on one or more  
25 claims of the '268 patent.

26 12. Defendant imports, buys, sells and offers to sell to its consumers the Real  
27 Touch Product Family over worldwide websites without regard to the patent rights of  
28 TZU Technologies, including in this district.

1 13. Defendants' sale of products and/or services on  
2 [www.realtouchvideos.com](http://www.realtouchvideos.com) and [www.realtouchinteractive.com](http://www.realtouchinteractive.com) infringes on one or  
3 more claims of the '268 Patent.

4 14. Defendants' infringement of the '268 Patent has been and continues to be  
5 willful.

6 15. Unless enjoined by this Court, Defendants will continue to infringe the  
7 '268 patent.

8 16. Plaintiff has been, and will continue to be, irreparably harmed by  
9 Defendants' ongoing infringement of the '268 patent.

10 17. This is an exceptional case under 35 U.S.C. § 285 and Plaintiff should  
11 therefore be awarded treble damages pursuant to 35 U.S.C. §284, of any and all  
12 damages awarded for Defendants' infringement of the '268 patent.

13 **COUNT I**

14 **CLAIM FOR PATENT INFRINGEMENT**

15 **UNDER 35 U.S.C. § 271 ('268 PATENT)**

16 18. TZU Technologies hereby incorporates by reference the allegations of  
17 paragraphs 1 through 17 of this Complaint as if fully set forth herein.

18 19. Defendants have imported, offered to sell and provide, have sold and  
19 provided, and continue to offer to sell and provide in the United States and in this  
20 District, products and/or services that infringe one or more claims of the '268 Patent,  
21 including the Real Touch Product Family.

22 20. Defendants' sale of products and/or services on  
23 [www.realtouchvideos.com](http://www.realtouchvideos.com) and [www.realtouchinteractive.com](http://www.realtouchinteractive.com) infringes on one or  
24 more claims of the '268 Patent.

25 21. Defendants' infringement of the '268 Patent has been and continues to be  
26 willful.

27 22. Unless enjoined by this Court, Defendants will continue to infringe  
28 the '268 Patent.



**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for relief against Defendants as follows:

A. For a permanent injunction to issue against Defendants, their agents, servants, employees, successors and assigns and all others in concert and privity with them from making, using, offering to sell, selling, or importing into the United States any product or service infringing on claims of United States Letters Patent No.; 6,368,268;

B. An award of damages in an amount to be determined at trial, but not less than a reasonable royalty and/or Plaintiff’s lost profits as a result of Defendants’ infringing actions;

C. A finding that Defendants’ infringement have been willful;

D. A trebling, pursuant to 35 U.S.C. § 284, of any and all damages awarded for Defendants’ infringement of the ‘268 Patent;

E. A finding that this is an exceptional case under 35 U.S.C. § 285;

F. An award, pursuant to 35 U.S.C. § 285, of reasonable attorneys’ fees;

G. An award of interest and costs; and

H. For such other and further relief as may be just and equitable.

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**DEMAND FOR TRIAL BY JURY**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands a jury trial on all issues and causes of action triable to a jury.

Respectfully submitted,

DATED: June 29, 2015

**COTMAN IP LAW GROUP, PLC**

s/Rasheed M. McWilliams

By: \_\_\_\_\_

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