IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. _____

KARMAN, Inc., a Colorado corporation,

Plaintiff,

v.

MILLER INTERNATIONAL, INC., a Colorado corporation,

Defendant.

COMPLAINT FOR PATENT INFRINGEMENT AND JURY DEMAND

STATEMENT OF JURISDICTION.

1. This action arises under a federal statute, 35 U.S.C. §101 *et seq*., including 35 U.S.C. §271.

2. Venue is proper in this Court under 28 U.S.C. § 1400(b) as this is the district where Defendant resides and is further a district where Defendant has committed acts of infringement.

BACKGROUND FACTS

3. Plaintiff Karman, Inc. is a Colorado corporation having its principal place of business at 14100 E 35th Place, #100, Aurora, Colorado 80011.

4. Defendant Miller International, Inc. is a Colorado corporation having its principal place of business at 8500 Zuni Street Denver Colorado 80260. Service of process is not requested at this time.

5. On June 25, 2013, United States Letters Patent No. 8,468,719 (the "'719 Patent") was issued to Plaintiff for an invention in articles of footwear and methods of footwear construction.

Plaintiff owned the patent throughout the period of Defendant's infringing acts and still owns the patent. A copy of the '719 Patent is attached hereto as **Exhibit A**.

FIRST CAUSE OF ACTION: DIRECT INFRINGEMENT

6. As of the date of this Complaint, Defendant has infringed and is still infringing the '719 Patent by making, selling, offering for sale, and/or using articles of footwear, namely boots, that embody the patented invention, and Defendant will continue to do so unless enjoined by this court.

7. Defendant has further infringed and is still infringing the '719 Patent by selling, offering for sale, and/or using the claimed methods of footwear construction that embody the patented invention, and Defendant will continue to do so unless enjoined by this court.

8. Defendant has had actual notice of the infringement by the filing of this Complaint.

JURY DEMAND

9. Pursuant to its Seventh Amendment rights, NJH requests a trial by jury.

DEMAND

10. Therefore, Plaintiff demands:

a. a preliminary and final injunction against the continuing infringement;

b. an accounting for damages; and

c. interest and costs.

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Dated: July 1, 2013

BERENBAUM WEINSHIENK PC

s/ Gary R Maze

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