IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

M-Edge International Corporation, 1334 Aston Road Suite B Hanover, MD 21076 County of Residence: Anne Arundel **Plaintiff**, v. **LifeWorks Technology Group LLC**, 1412 Broadway 3rd Floor New York, NY 10018 **Defendant**.	**Case No. 14-3627** **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff M-Edge International Corporation ("M-Edge"), by and through its undersigned attorneys, hereby brings the following Complaint for patent infringement against Defendant LifeWorks Technology Group LLC ("LifeWorks") and, in support thereof, alleges as follows:

PARTIES

1. Plaintiff M-Edge is a Maryland corporation with its principal place of business in Hanover, Maryland. M-Edge is a device accessories company engaged in, among other things, the manufacture and sale of cases for tablet computers.

2. Defendant LifeWorks is a New York limited liability company with its principal place of business in New York, New York. Upon information and belief, LifeWorks is also a device accessories company engaged in the manufacture and sale of cases for tablet computers.

JURISDICTION AND VENUE

3. This is a claim for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code, and specifically alleged infringement under 35 U.S.C. § 271, *et seq.*

4. This Court has exclusive subject matter jurisdiction over this case pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Defendant LifeWorks because LifeWorks has established minimum contacts with the forum by purposefully availing itself of the laws and benefits of the forum, and the exercise of jurisdiction over LifeWorks would not offend traditional notions of fair play and justice. Upon information and belief, LifeWorks has voluntarily conducted business in this judicial district by selling its infringing cases for tablet computers in this district.

6. Venue is proper in this judicial district under 28 U.S.C. §§ 1391 and 1400(b).

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 8,887,910

7. The allegations set forth in the foregoing paragraphs 1 through 6 are incorporated by reference as if fully set forth herein.

8. On November 18, 2014, U.S. Patent No. 8,887,910 ("the '910 Patent"), entitled "Low Profile Protective Cover Configurable as a Stand," was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '910 Patent is attached as **Exhibit A**.

9. Plaintiff M-Edge is the assignee and owner of the right, title, and interest in and to the ’910 Patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

10. Upon information and belief, Defendant LifeWorks has and continues to directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’910 Patent by making, using, offering to sell, selling, and/or importing products that include the claimed combinations of features of the ’910 Patent, including a protective cover for an electronic device with a front, middle rear, and exterior rear cover with a holding sheet that is attached to the exterior rear cover having openings formed in the plane and located at the corners to form bands configured to attach to corners of the electronic device for securing the electronic device to the protective cover, which products include the LifeWorks Universal Tablet Bundle (Product Nos. LW-BD2000B, LW-BD2001B) (also marketed as Club Jacket) , the LifeWorks Denim Jacket (Product Nos. LW-T2040, LW-T2041), the LifeWorks Turn Coat (Product Nos. LW-T2010, LW-T2011), the LifeWorks Mag Book 360 (Product Nos. LW-T1200, LW T1201), and the LifeWorks Fur Coat (Product No. LW-T2020) (collectively “Infringing Products”). The Infringing Products are produced in multiple sizes and colors, each of which infringes the ’910 Patent.

11. Plaintiff M-Edge has been damaged by Defendant LifeWorks’s infringement and unless LifeWorks obtains a license to the ’910 Patent from M-Edge or is enjoined by this Court from making, using, selling, and importing the Infringing Products, LifeWorks will continue its infringing activity and M-Edge will continue to be damaged.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff M-Edge prays for the following relief against Defendant LifeWorks:

A. The entry of judgment in favor of M-Edge and against LifeWorks;

B. An award of damages adequate to compensate M-Edge for the infringement that has occurred, together with prejudgment interest from the date the infringement began, but in no event less than a reasonable royalty as permitted by 35 U.S.C. § 284;

C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of M-Edge's reasonable attorneys' fees;

D. A permanent injunction prohibiting further infringement of the '910 Patent; and

E. Such other relief that M-Edge is entitled to under law and any other further relief that this Court or a jury may deem just and proper.

JURY DEMAND

Plaintiff M-Edge demands a trial by jury on all issues presented in this Complaint.

Dated: November 18, 2014

Respectfully submitted,

/s/ Brianna Lynn Silverstein

Brianna Lynn Silverstein (Bar No. 18443)
Jeffrey J. Lopez (Bar Admission Application Pending)
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