

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

**PACIFIC BIOSCIENCE LABORATORIES,
INC. a Washington Corporation,**

Plaintiff,

v.

**PRETIKA CORPORATION, a California
Corporation,**

Defendant.

Case No.:

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY DEMAND

Plaintiff Pacific Bioscience Laboratories, Inc., through its attorneys Faegre & Benson, LLP, submits this Complaint in the action for patent infringement, and for its complaint against Defendant Pretika Corporation (“Pretika”), states as follows:

PARTIES

1. Plaintiff Pacific Bioscience Laboratories, Inc., is a Washington corporation having its principal place of business at 13222 SE 30th Street #A1 Bellevue, WA 98005.
2. Pacific Bioscience Laboratories is in the business of developing and marketing technically advanced skin care products, including the Clarisonic skin care system.
3. On information and belief, Pretika is a California corporation with its principal place of business at 16 Salermo, Laguna Niguel, California 92677.

1 B. Award Pacific Bioscience Laboratories its compensatory damages resulting from Pretika's
2 infringement, together with interest and costs as fixed by the Court, as provided by 35 U.S.C. § 284;

3 C. Issue an injunction enjoining Pretika, its employees, agents, and all others acting in
4 concert with Pretika from further infringement of the claims of the '691 Patent, as provided by 35 U.S.C.
5 § 283; and

6 D. Grant such other and further relief as the court may find just and proper, including
7 reasonable attorneys fees where appropriate.

8 Dated: February 8, 2010

9 FAEGRE & BENSON LLP

10
11
12 s/ Marc Levy
13 Natalie Hanlon-Leh (Pro Hac Vice Application Pending)
14 Marc Levy (Wash. Bar No. 19203)
15 Mary V. Sooter (Pro Hac Vice Application Pending)
16 3200 Wells Fargo Center
17 1700 Lincoln Street
18 Denver, CO 80203-4532 USA
19 Telephone: 303.607.3500
20 Facsimile: 303.607.3600
21 nhanlonleh@faegre.com
22 mlevy@faegre.com
23 msooter@faegre.com

24 ATTORNEYS FOR PLAINTIFF
25
26