Case 2:11-cv-03677-SJF-ARL Document 1 Filed 07/29/11 Page 1 of 55 Page D # IN CLERK'S OFFICE U.S. DISTRICT COURT E.D.N.Y

★ JUL 29 2011

LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

CARSON OPTICAL, INC. and LEADING EXTREME OPTIMIST INDUSTRIES, LTD.

Plaintiffs.

٧.

PRYM CONSUMER USA INC.

Defendant.

SUMMONS ISSUED

Civil Action No.:

CV 11 3677

JULY 28, 2011

HURLEY, J.

LINDSAY M

COMPLAINT

The plaintiffs, Carson Optical, Inc. and Leading Extreme Optimist Industries, Ltd., hereby file their complaint against the defendant, Prym Consumer USA Inc., as follows:

PARTIES

1. The plaintiff, Carson Optical, Inc. ("Carson") is, and at all relevant times has been, a corporation organized and existing under the laws of the State of New York, and maintains its principal place of business in Hauppague, New York.

- 2. Carson markets and sells optical products throughout the country, including within this Judicial District.
- 3. The plaintiff, Leading Extreme Optimist Industries, Ltd. ("Leading"), is a manufacturer of optical products located in Hong Kong.
- 4. The defendant, Prym Consumer USA Inc. ("Prym"), is a corporation organized and existing under the laws of the State of South Carolina, and upon information and belief, maintains its principal place of business in Spartanburg, South Carolina.
- 5. Upon information and belief, Prym transacts business in New York, and upon information and belief, has engaged in infringing activity in New York.

JURISDICTION AND VENUE

- 6. This is an action for, *inter alia*, violation of the Patent Laws of the United States of America, 35 U.S.C. § 271, et al. and for tradedress infringement in violation of the Lanham Act of 1946, as amended, 15 U.S.C. § 1125(a).
- 7. The Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§1331, 1338(a), 1338(b) and 1367(a) and 15 U.S.C. § 1121. Venue is proper within this judicial district pursuant to 28 U.S.C. §§1391(b), 1391(c), and 1400(b).

THE PLAINTIFFS' INTELLECTUAL PROPERTY RIGHTS

- 8. On September 7, 2004, the United States Patent and Trademark
 Office issued U.S. Patent No. D495,726 S ("the '726 Patent"). A copy of the '726
 Patent is attached hereto as Exhibit A.
- 9. Since September 7, 2004, Leading has been the owner and Carson has been the exclusive licensee of the '726 Patent.
- 10. The exclusive right to market and sell products claimed by the '726 Patent is a valuable business asset of Carson.
- 11. The commercial embodiment of the '726 Patent is a product that bears the trademark RIMFREE. An exemplar of the RimFreeTM magnifier is attached hereto as Exhibit B.
- 12. On March 11, 2008, the United States Patent and Trademark Office issued U.S. Patent No. D563,779 S ("the '779 Patent"). A copy of the '779 Patent is attached hereto as Exhibit C.
- 13. Since March 11, 2008, Leading has been the owner and Carson has been the exclusive licensee of the '779 Patent.
- 14. The exclusive right to market and sell products claimed by the '779 Patent is a valuable business asset of Carson.

- 15. The commercial embodiment of the '779 Patent is a product that bears the trademark ATTACH-A-MAG. An exemplar of the Attach-a-MagTM product is attached hereto as Exhibit D.
- 16. On August 2, 2005, the United States Patent and Trademark Office issued U.S. Patent No. D508,063 S ("the '063 Patent"). A copy of the '063 Patent is attached hereto as Exhibit E.
- 17. Since August 2, 2005, Leading has been the owner and Carson has been the exclusive licensee of the '063 Patent.
- 18. The exclusive right to market and sell products claimed by the '063 Patent is a valuable business asset of Carson.
- 19. Carson's commercial embodiment of the '063 Patent is the Attacha-MagTM product also shown in Exhibit D.
- 20. Additionally, in or around September 1998, Carson adopted and began using an ornamental design and overall appearance of a magnifier, which has been marketed and sold under the trademark SUREGRIP. An exemplar of the ornamental design and overall appearance of the magnifier marketed and sold under the SureGripTM brand is attached as <u>Exhibit F</u>. The ornamental design and overall appearance of the SureGripTM magnifier is inherently distinctive and/or has acquired secondary meaning in the relevant marketplace and is not functional.

- 21. Since September 1998, Carson has continuously and extensively marketed, promoted and sold magnifiers comprising the ornamental design and overall appearance illustrated in Exhibit F throughout the United States.
- 22. As a result, the magnifiers comprising the ornamental design and overall appearance that are marketed and sold under the trademark SureGrip[™] have become a marketing success.
- 23. On or about October 30, 1998, Carson also adopted a certain design for a magnifier that is currently sold under the brandname CLIP & FLIP. An exemplar of this product is attached as Exhibit G.
- 24. From approximately October 1998 to the present, Carson has extensively marketed, promoted and sold the Clip & Flip[™] magnifier illustrated in Exhibit G in the United States.
- 25. The Clip & Flip[™] magnifier illustrated in <u>Exhibit G</u> has been a commercial success.
- 26. Carson has also developed written materials, including packaging materials, which describe the features and benefits of its Clip & FlipTM magnifier.
- 27. Carson is the sole owner of all rights, title and interest in and to the copyright in said written marketing materials.

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28. Carson markets and sells its products to major retailers in the United States, including, until recently, Jo-Ann Fabric and Crafts Stores[®].

THE INFRINGING AND DECEPTIVE ACTS OF THE DEFENDANT

- 29. Upon information and belief, Prym secured a manufacturer to copy and reproduce Carson's products.
- 30. More particularly, Prym has imported, offered for sale and sold a magnifier that infringes the '726 Patent. An exemplar of this infringing product is attached as Exhibit H.
- 31. Prym has also imported, offered for sale and sold a product that infringes the '779 Patent. An exemplar of this infringing product is attached as Exhibit I.
- 32. Prym has also imported, offered for sale and sold a product that infringes the '063 Patent. An exemplar of this infringing product is also attached as Exhibit I.
- 33. Prym has also imported, offered for sale and sold a magnifier that is a copy of Carson's SureGrip[™] magnifier and infringes Carson's tradedress rights.

 An exemplar of this infringing product is attached as <u>Exhibit J</u>.
- 34. Prym has additionally imported, offered for sale and sold a magnifier that is a copy of Carson's Clip & Flip[™] magnifier. An exemplar of this infringing product is attached as Exhibit K.

- 35. In furtherance of Prym's misappropriation of the intellectual property rights of Carson, Prym has copied portions of Carson's written marketing materials associated with the Clip & FlipTM magnifier.
- 36. Because of Prym's infringement of at least the '726 Patent, the '779 Patent and/or the '063 Patent, Prym was able to wholly displace Carson as a supplier to Jo-Ann Fabric and Craft Stores[®].

FIRST COUNT—INFRINGEMENT OF '726 PATENT

- 37. Paragraphs 1 through 36 are hereby incorporated by reference as if fully set forth herein.
- 38. By its import, marketing, offering for sale and sale of a "rimless" magnifier, Prym has infringed and continues to infringe the '726 Patent in violation of 35 U.S.C. § 271(a).
- 39. Prym's infringement was and is willful, purposeful and/or deliberate, and has caused substantial harm to Carson and Leading.
- 40. Carson and Leading have suffered damages in the form of, *inter alia*, a diversion of trade and lost profits. In particular, because of Prym's infringement of the '726 Patent, Prym was able to wholly displace Carson as a supplier to Jo-Ann Fabric and Craft Stores[®], which has resulted in a substantial loss of profits.

- 41. Carson and Leading have been and will continue to suffer irreparable harm, unless Prym is enjoined by this Court.
- 42. This is an exceptional case, entitling the plaintiffs to the recovery of reasonable attorneys' fees and costs in pursuing this matter to judgment.

SECOND COUNT—INFRINGEMENT OF '726 PATENT

- 43. Paragraphs 1 through 36 are hereby incorporated by reference as if fully set forth herein.
- 44. Prym, by its actions, has actively induced others, including Jo-Ann Fabric and Craft Stores[®], to infringe the '726 Patent in violation of 35 U.S.C. § 271(b).
- 45. Prym's infringing activity was willful, purposeful and/or deliberate, and has caused substantial harm to Carson and Leading.
- 46. Carson, in particular, has suffered damages in the form of, *interalia*, a diversion of trade and lost profits.
- 47. Prym actively induced infringement of the '726 Patent to secure payments on sales by its customers.
- 48. This is an exceptional case, entitling the Plaintiffs to the recovery of reasonable attorneys' fees and costs in pursuing this matter to judgment.

THIRD COUNT—INFRINGEMENT OF '779 PATENT

- 49. Paragraphs 1 through 36 are hereby incorporated by reference as if fully set forth herein.
- 50. By its import, marketing, offering for sale and sale of its "Clamp-a-Magnifier" product, Prym has infringed and continues to infringe the '779 Patent in violation of 35 U.S.C. § 271(a).
- 51. Prym's infringement was and is willful, purposeful and/or deliberate, and has caused substantial harm to Carson and Leading.
- 52. Carson, in particular, has suffered damages in the form of, *inter alia*, a diversion of trade and lost profits. In particular, because of Prym's infringement of the '779 Patent, Prym was able to wholly displace Carson as a supplier to Jo-Ann Fabric and Craft Stores[®], which has resulted in a substantial loss of profits.
- 53. Carson and Leading have been and will continue to suffer irreparable harm, unless Prym is enjoined by this Court.
- 54. This is an exceptional case, entitling the plaintiffs to the recovery of reasonable attorneys' fees and costs in pursuing this matter to judgment.

FOURTH COUNT—INFRINGEMENT OF '779 PATENT

- 55. Paragraphs 1 through 36 are hereby incorporated by reference as if fully set forth herein.
- 56. Prym, by its actions, has actively induced others, including Jo-Ann Fabric and Craft Stores[®], to infringe the '779 Patent in violation of 35 U.S.C. § 271(b).
- 57. Prym's infringing activity was willful, purposeful and/or deliberate, and has caused substantial harm to Carson and Leading.
- 58. Carson, in particular, has suffered damages in the form of, *interalia*, a diversion of trade and lost profits.
- 59. Prym actively induced infringement of the '779 Patent to secure payments on sales by its customers.
- 60. This is an exceptional case, entitling the Plaintiffs to the recovery of reasonable attorneys' fees and costs in pursuing this matter to judgment.

FIFTH COUNT—INFRINGEMENT OF '063 PATENT

- 61. Paragraphs 1 through 36 are hereby incorporated by reference as if fully set forth herein.
- 62. By its import, marketing, offering for sale and sale of its "Clamp-a-Magnifier" product, Prym has infringed and continues to infringe the '063 Patent in violation of 35 U.S.C. § 271(a).

- 63. Prym's infringement was and is willful, purposeful and/or deliberate, and has caused substantial harm to Carson and Leading.
- 64. Carson, in particular, has suffered damages in the form of, *inter alia*, a diversion of trade and lost profits. In particular, because of Prym's infringement of the '063 Patent, Prym was able to wholly displace Carson as a supplier to Jo-Ann Fabric and Craft Stores[®], which has resulted in a substantial loss of profits.
- 65. Carson and Leading have been and will continue to suffer irreparable harm, unless Prym is enjoined by this Court.
- 66. This is an exceptional case, entitling the plaintiffs to the recovery of reasonable attorneys' fees and costs in pursuing this matter to judgment.

SIXTH COUNT—INFRINGEMENT OF '063 PATENT

- 67. Paragraphs 1 through 36 are hereby incorporated by reference as if fully set forth herein.
- 68. Prym, by its actions, has actively induced others, including Jo-Ann Fabric and Craft Stores[®], to infringe the '063 Patent in violation of 35 U.S.C. § 271(b).
- 69. Prym's infringing activity was willful, purposeful and/or deliberate, and has caused substantial harm to Carson and Leading.

- 70. Carson, in particular, has suffered damages in the form of, *inter alia*, a diversion of trade and lost profits.
- 71. Prym actively induced infringement of the '063 Patent to secure payments on sales by its customers.
- 72. This is an exceptional case, entitling the Plaintiffs to the recovery of reasonable attorneys' fees and costs in pursuing this matter to judgment.

SEVENTH COUNT—TRADEDRESS INFRINGEMENT

- 73. Paragraphs 1 through 36 are hereby incorporated by reference as if fully set forth herein.
- 74. Prym has copied the ornamental design and overall appearance of Carson's SureGrip™ magnifier.
- 75. The ornamental design and overall appearance of Carson's SureGrip™ magnifier is not functional.
- 76. Prym's copying of the ornamental design and overall appearance of Carson's SureGrip™ magnifier was intended to cause, and is likely to cause confusion, mistake, or deception as to the affiliation, connection or association of the products with Carson, or as to the origin, sponsorship, or approval of the products by Carson, and constitutes a false or misleading representation as to the source or sponsorship of the products or a false designation of origin, all in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

- 77. Prym's actions purposefully trade on, misappropriate and wrongfully reap the benefits of the goodwill and reputation that have attached to Carson's tradedress rights in the SureGrip™ magnifier.
- 78. The acts and conduct of Prym constitute willful and deliberate infringement of Carson's tradedress rights.
- 79. As a result of Prym's infringing conduct, Carson has suffered damages, including, *inter alia*, a diversion of trade, lost profits, and diminishment of goodwill.
- 80. The aforesaid conduct of Prym has caused irreparable injury to the business and goodwill of Carson and will continue to cause irreparable harm to Carson unless enjoined by this Court.

EIGHTH COUNT - COMMON LAW UNFAIR COMPETITION

- 81. Paragraphs 1 through 36 are hereby incorporated by reference as if fully set forth herein.
- 82. Prym's acts and conduct, alone and/or in combination, constitute common law unfair competition under the laws of the State of New York and other states in which Prym has promoted and/or sold its products.
- 83. Prym has engaged in acts and/or conduct, alone or in combination, constituting common law unfair competition by, among other things:

- a. Copying and reproducing Carson's products, including the RimFreeTM and SureGripTM magnifiers, the Clip & FlipTM magnifier and the Attach-a-MagTM product;
- b. Providing knock-offs of Carson's products to Jo-Ann Fabric and Crafts Stores;
- c. Securing of Jo-Ann Fabric and Craft Stores as a customer by importing, offering for sale and selling products that infringe Carson and Leading's intellectual property rights;
- d. Copying portions of Carson's written marketing materials associated with the Clip & FlipTM magnifier;
- e. Systematically infringing Carson's intellectual property rights, including the '726 Patent, and thereby unfairly competing with Carson; and/or
- f. Displacing Carson as a supplier to JoAnn Fabric and Craft Stores by illegally copying Carson's product(s).
- 84. Prym's acts of unfair competition, as detailed above, have damaged and will continue to cause irreparable harm to the business and goodwill of Carson and Leading unless restrained by this Court.
- 85. Prym's acts have caused harm and loss to Carson and Leading, entitling each to the recovery of damages.

NINTH COUNT - TORTIOUS INTERFERENCE WITH PROSPECTIVE BUSINESS RELATIONS

86. Paragraphs 1 through 36 are hereby incorporated by reference as if fully set forth herein.

- 87. Carson had business relationship with Jo-Ann Fabrics and Crafts Stores.
- 88. Prym engaged in dishonest, unfair, and/or improper means to interfere with Carson's prospective business relations with Jo-Ann Fabrics and Crafts.
- 89. Prym engaged in dishonest, unfair, and/or improper means to interfere with Carson's prospective business relations with Jo-Ann Fabrics and Crafts by, among other things:
 - a. Copying and reproducing Carson's products, including the RimFreeTM and SureGripTM magnifiers, the Clip & FlipTM magnifier and the Attach-a-MagTM product;
 - b. Providing knock-offs of Carson's products to Jo-Ann Fabric and Crafts Stores;
 - c. Securing of Jo-Ann Fabric and Craft Stores as a customer by importing, offering for sale and selling products that infringe Carson and Leading's intellectual property rights;
 - d. Copying portions of Carson's written marketing materials associated with the Clip & Flip[™] magnifier;
 - e. Systematically infringing Carson's intellectual property rights, including the '726 Patent, and thereby unfairly competing with Carson; and/or
 - f. Displacing Carson as a supplier to JoAnn Fabric and Craft Stores by illegally copying Carson's product(s).

90. As a result of Prym's tortious interference, Prym has caused injury to Carson's business relations with Jo-Ann Fabrics and Crafts.

PRAYER FOR RELIEF

WHEREFORE, Carson and Leading pray for the following:

- An Order enjoining Prym from importing, marketing, distributing, offering for sale and selling any products that infringe the '726 Patent.
- 2. An Order enjoining Prym from inducing infringement of the '726 Patent.
- An Order enjoining Prym from importing, marketing, distributing, offering for sale and selling any products that infringe the '779 Patent.
- 4. An Order enjoining Prym from inducing infringement of the '779 Patent.
- 5. An Order enjoining Prym from importing, marketing, distributing, offering for sale and selling any products that infringe the '063 Patent.
- 6. An Order enjoining Prym from inducing infringement of the '063 Patent.
- An Order enjoining Prym from importing, marketing, distributing, offering for sale and selling any products that infringe Carson's tradedress rights.
- 8. An order preliminarily and permanently enjoining Prym from utilizing marketing materials, including packaging materials, that infringe Carson's copyright.
- 9. An Order impounding and/or destroying all infringing products.

- 10. An award of money damages pursuant to 35 U.S.C. § 284, 35 U.S.C. § 289 and 15 U.S.C. § 1117 and the common law.
- 11. Multiple damages pursuant to 35 U.S.C. § 284 and 15 U.S.C. § 1117.
- 12. An award of attorneys' fees and costs pursuant to 35 U.S.C. §285 and 15 U.S.C. § 1117.
- 13. Prejudgment Interest.
- 14. Punitive damages.
- 15. Costs.
- 16. Such other relief as this Court deems just and proper.

JURY DEMAND

Carson and Leading hereby request a trial by jury of any issue so triable as of right pursuant to Rule 38(b) of the Federal Rules of Civil Procedure.

THE PLAINTIFFS,

CARSON OPTICAL, INC. and LEADING EXTREME OPTIMIST:

INDUSTRIES, LTD.

John R. Horvack, Jr.

Federal/Bar No. JH4878 Carmody & Torrance, LLP

195 Church Street New Haven, CT 06509 Phone: 203-777-5501

Fax: 203-784-3199

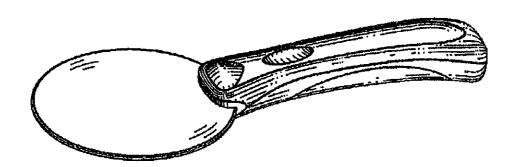
Email: jhorvack@carmodylaw.com

EXHIBIT A



(12) United States Design Patent (10) Patent No.: US D495,726 S Yip et al. US D495,726 S 45) Date of Patent: ** Sep. 7, 2004

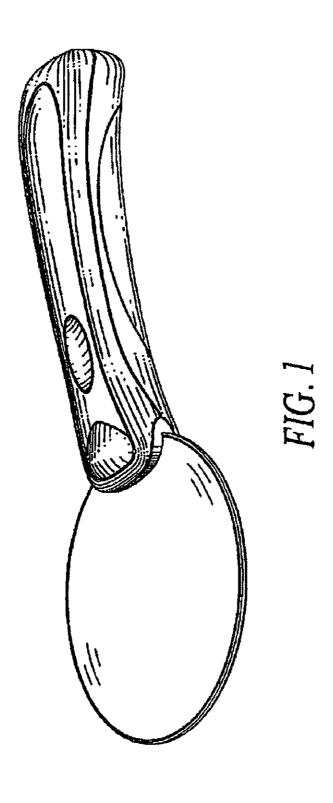
			* *		
(54)	MAGNIF		D395,907 S • 7/1998 Calello		
(75)	Inventors:	Gin Fai Yip, North Point (HK); Bryan Yip, Kowlooc (HK)	D440,243 S * 4/2001 Jecquel D16/135 * cited by examiner		
(73)	Assignee:	Leading Extreme Optimist Industries, Ltd., Chai Wan (HK)	Primary Examiner—Paula A. Greene (74) Attorney, Agent, or Firm—Carmody & Tortance LLP		
(**)	Term:	14 Years	(57) CLAIM		
(21)	Appl. No.:	29/189,563	The ornamental design for a magnifier, as shown and described.		
(22)	Filed:	Sep. 8, 2003	DESCRIPTION		
(51) (52) (58)	LOC (7) Cl		FIG. 1 is a perspective view of a magnifler showing our new design; FIG. 2 is a top plan view thereof; FIG. 3 is a left side elevational view thereof; FIG. 4 is a right side clevational view thereof; FIG. 5 is a bottom plan view thereof; FIG. 6 is a first and elevational view thereof; and,		
(56)	References Clied				
	U.S. PATENT DOCUMENTS		FIG. 7 is a second end elevational view thereof.		
		• 6/1915 Wells	l Claim, 5 Drawing Sheets		



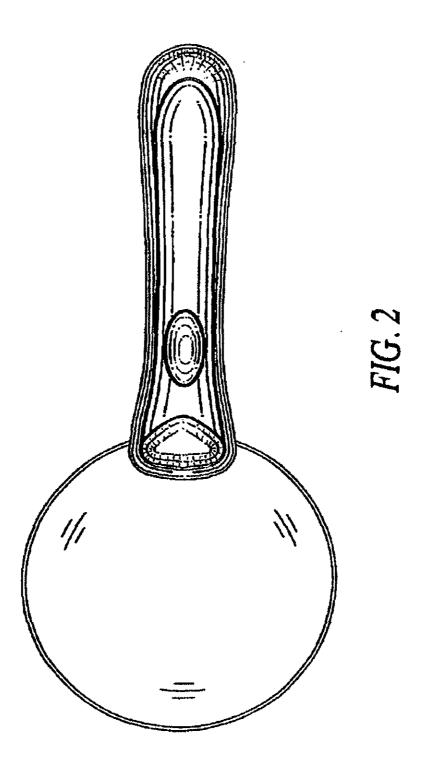
U.S. Patent Sep. 7, 2004

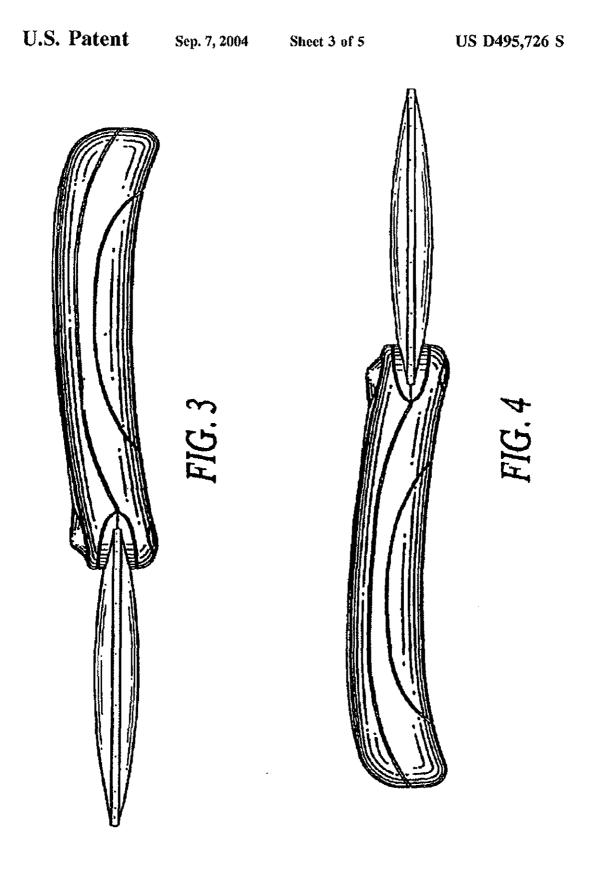
Sheet 1 of 5

US D495,726 S

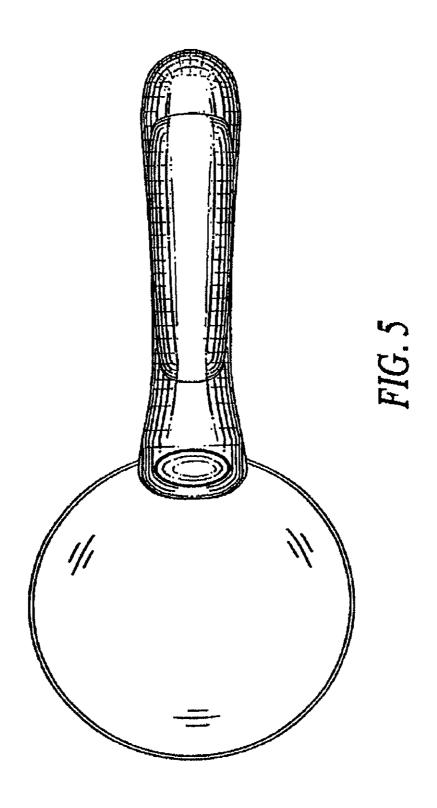


U.S. Patent Sep. 7, 2004 Sheet 2 of 5 US D495,726 S





U.S. Patent Sep. 7, 2004 Sheet 4 of 5 US D495,726 S

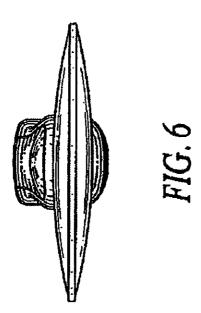


U.S. Patent

Sep. 7, 2004

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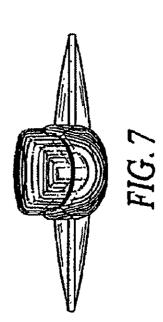
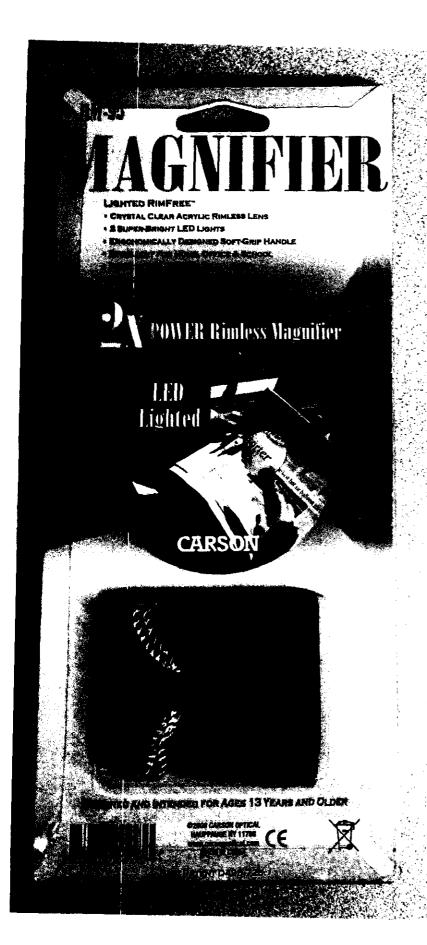


EXHIBIT B



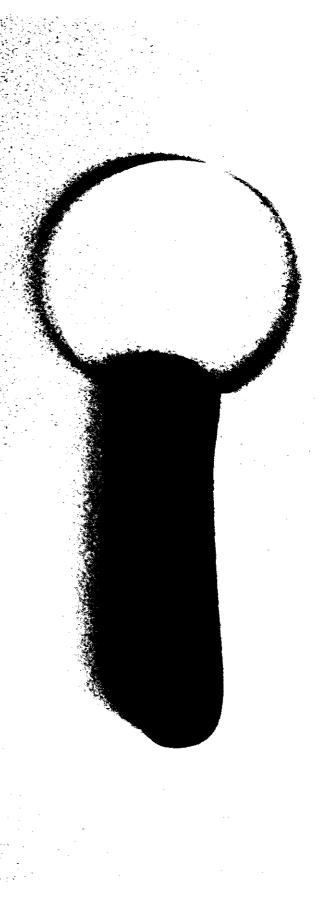
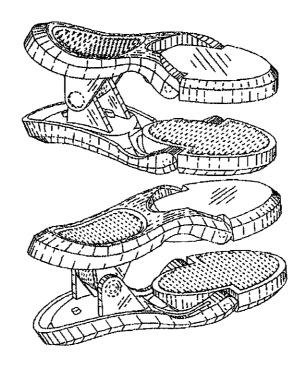


EXHIBIT C



United States Design Patent (10) Patent No.: US D563,779 S Yip et al. (45) Date of Patent: ** Mar. 11, 2008

Yip et al.			(45) Date of Patent: ** War. 11, 2008		
(54)	CLAMP		D277,320 S	1/1985 Selden	
(75)	Inventors:	Gin Fai Yip, North Point (HK); Bryan Yip, Kowloon (HK)	4,648,733 A D302,654 S * 5,002,552 A * 5,033,528 A	3/1991 Casey	
(73)	Assignee:	Lending Extreme Optimist Industries, Ltd., Chai Wau (HK)	D322,390 S * 5,604,633 A D443,201 S *	2/1997 Christianson 6/2001 Bendick	
(**)	Term:	14 Years	6,476,984 BT D477,029 S * D549,417 S *	7/2003 Korowitz D19/78	
(21)	Appl. No.	29/231,845	* cited by examiner		
(22)	Filed:	Jun. 10, 2005	Primary Examiner-	Stella M. Reid	
		ated U.S. Application Data	Assistant Examiner—John Windmuller (74) Attorney, Agent, or Firm—Carmody & Torrance LLP		
(62)		fapplication No. 29/195,733, filed on Dec. now Pat. No. Des. 508,063.	(57)	CLAIM	
(51) (52)	LOC (8) Cl		The ornamental des	ign for a clamp, as shown and described.	
(58)	Field of Classification Search D8/394-396, D8/72; D19/56, 65; 24/67.3 See application file for complete search history.		DESCRIPTION		
(,			FIGS, 1 and 8 are perspective views of a clamp showing our new design;		
(56)	References Cited		FIG. 2 is a top plan	n view thereof:	
(50)	U.S. PATENT DOCUMENTS		FIG. 3 is a right side elevational view thereof; FIG. 4 is a left side elevational view thereof.		
	1,224,431 A	5/1917 Vorst	FIG. 5 is a first end elevational view thereof;		
	1,445,908 A 1,895,410 A	2/1923 Perkins 1/1933 Figlia	FIG. 6 is a second end elevational view thereof; and,		
	3,510,204 A	5/1970 Jack	FIG. 7 is a bottom plan view thereof.		
	3,779,108 A 4,020,530 A 10264,598 S	12/1973 Reiter * 5/1977 Sartore		laim, 4 Drawing Sheets	



U.S. Patent Mar. 11, 2008 Sheet 1 of 4 US D563,779 S

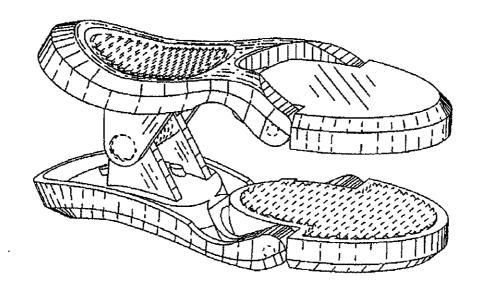
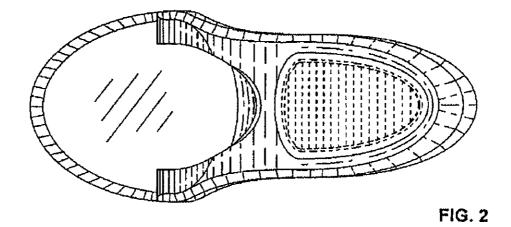


FIG. 1



U.S. Patent

Mar. 11, 2008 Sheet 2 of 4

US D563,779 S

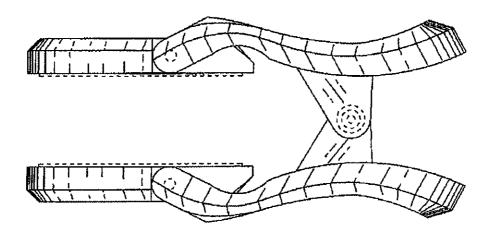


FIG. 3

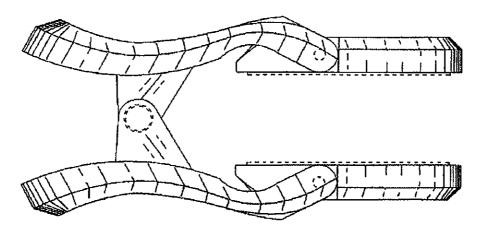


FIG. 4

U.S. Patent

Mar. 11, 2008

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US D563,779 S

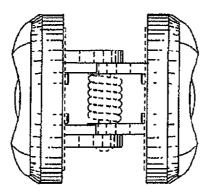


FIG. 5

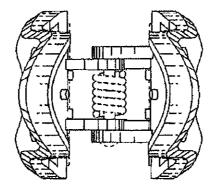


FIG. 6

U.S. Patent Mar. 11, 2008

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US D563,779 S

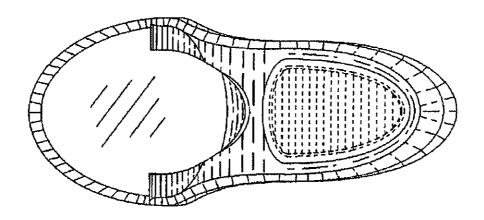
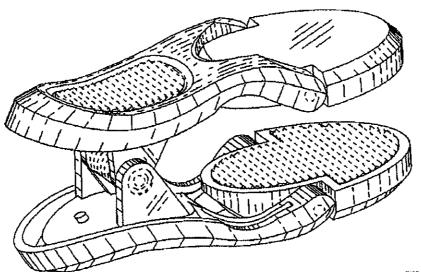


FIG. 7



FIG, 8

EXHIBIT D

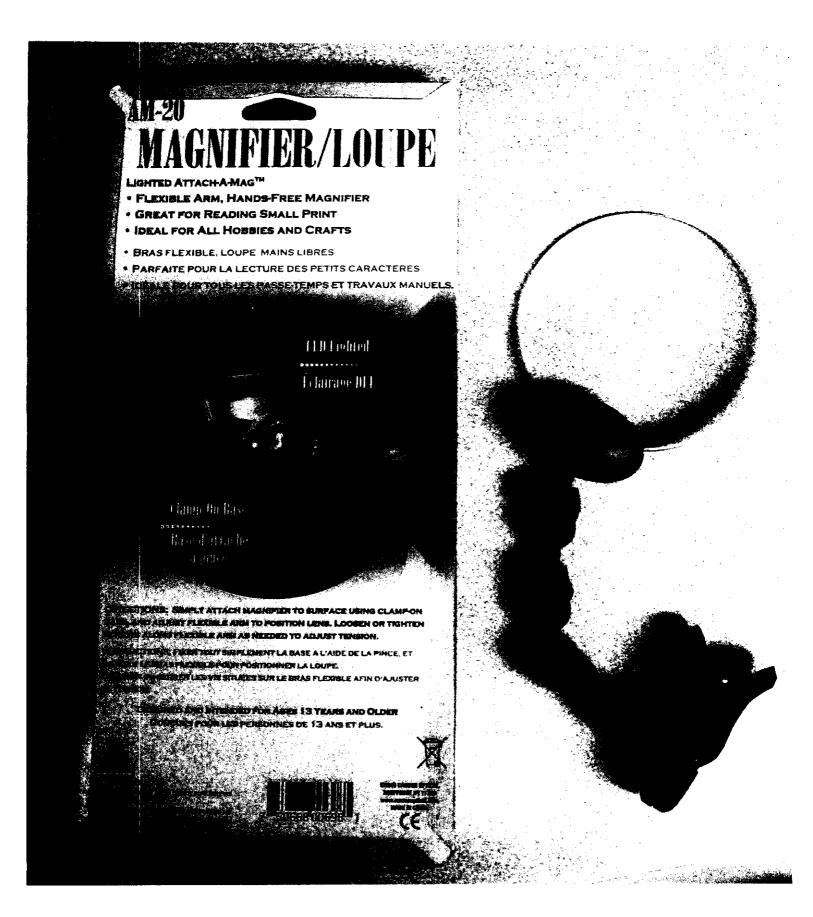
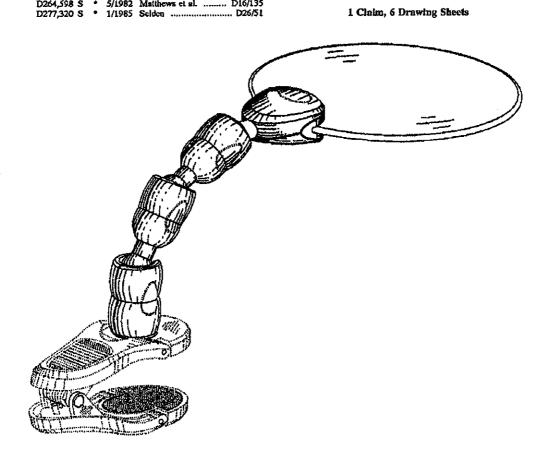


EXHIBIT E

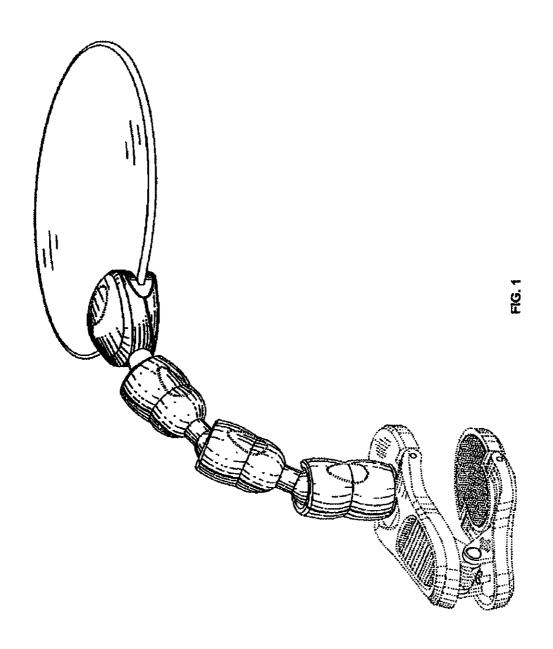
(12) United States Design Patent (10) Patent No.: US D508,063 S Yip et al. (45) Date of Patent: 4* Aug. 2, 2005

(54) (75)		4,648,733 A * 3/1987 Merkt
(73)		* cited by examiner
		Primary Examiner—Paula A. Greene
(**)	Torm: 14 Years	(74) Attorney, Agent, or Flrm—Carmody & Torran∞ LLP
		(57) CLAIM
(21)	Appl. No.: 29/195,733	The ornamental design for a magnifier, as shown and described. DESCRIPTION FIG. 1 is a perspective view of a magnifier showing our new design; FIG. 2 is a top plan view thereof; FIG. 3 is a right side elevational view thereof; FIG. 4 is a left side elevational view thereof;
(22)	Filed: Dec. 16, 2003	
	•	
(51) (52) (58)	LOC (8) Cl	
(56)	References Cited	FIG. 5 is a first end elevational view thereof;
	U.S. PATENT DOCUMENTS	FIG. 6 is a second and elevational view thereof; and, PIG. 7 is a bottom plan view thereof. The dotted showings are environmental only and form no part of the claimed design.
	1,224,431 A • 5/1917 Van Vorst	





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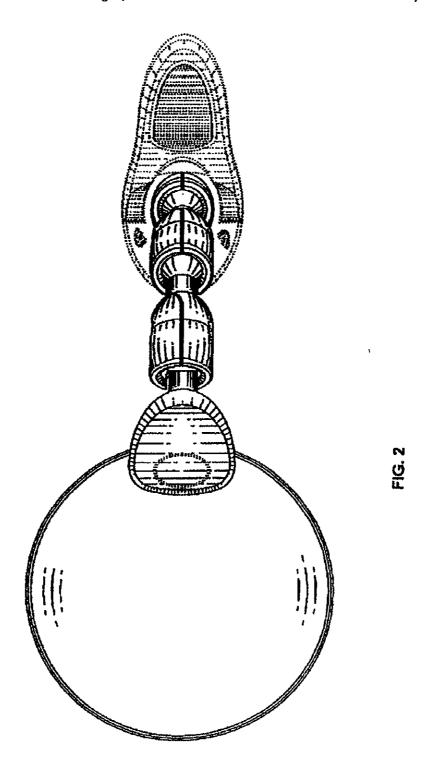


U.S. Patent

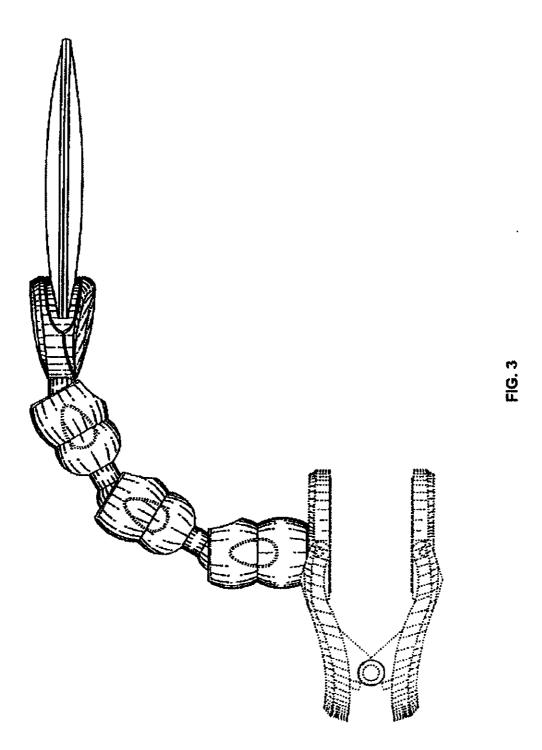
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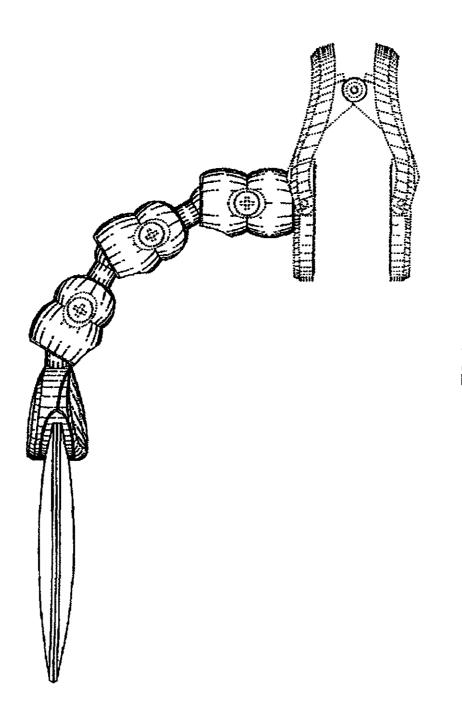
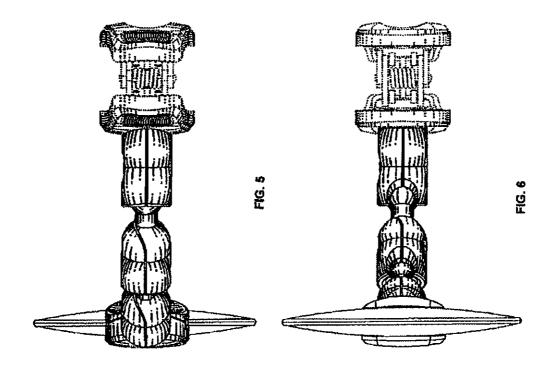


FIG. 4

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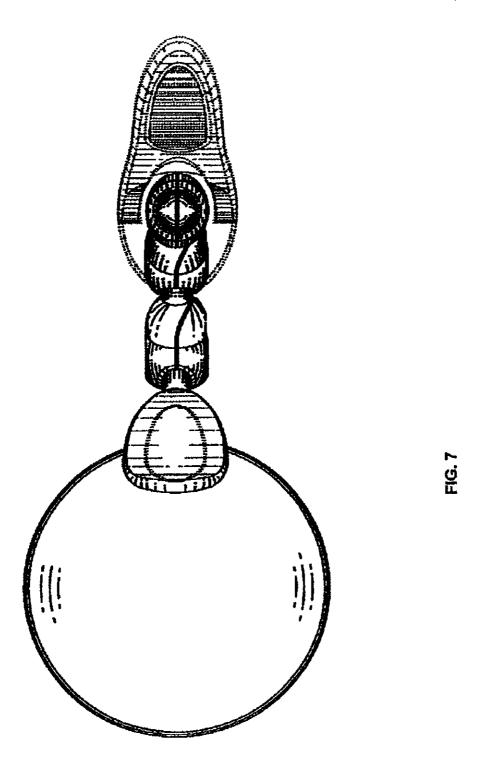


EXHIBIT F





EXHIBIT G

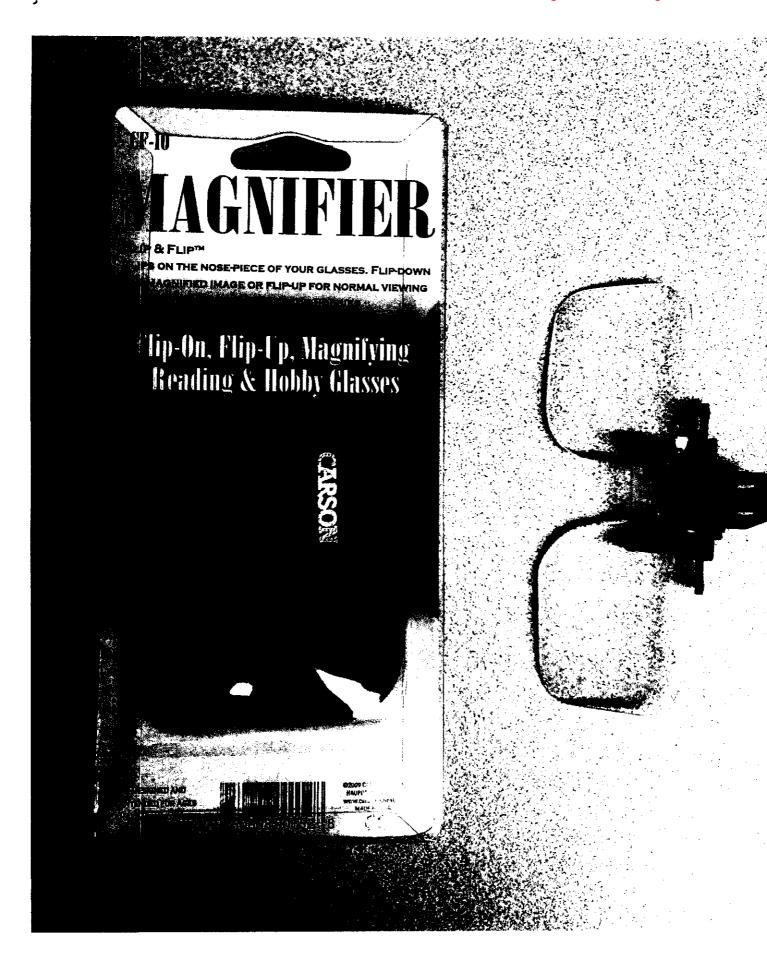


EXHIBIT H



EXHIBIT I



EXHIBIT J



EXHIBIT K