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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

CAO GROUP, INC., a Utah corporation, Plaintiff, v. AMD LASERS, LLC, an Indiana limited liability company, Defendant.	COMPLAINT Case No. 2:12-cv-00387-BCW Magistrate Judge Brooke C. Wells

Plaintiff CAO Group, Inc., ("CAO") complains and alleges against Defendant AMD Lasers, LLC ("AMD") as follows:

PARTIES

1. Plaintiff CAO is a Utah corporation located at 4628 West Skyhawk Drive, West Jordan, UT 84084.

2. On information and belief, Defendant AMD is an Indiana limited liability company with a principal place of business at 7405 Westfield Blvd., Indianapolis, IN 46240.

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States 35 U.S.C. §§ 1 *et seq*., including 35 U.S.C. § 271.

2. On information and belief, Defendant has infringed and continues to infringe, contribute to the infringement of, and/or actively induce others to infringe CAO's U.S. Patent No. 7,485,116 (the "'116 Patent").

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338.

4. This Court has personal jurisdiction over Defendant AMD because, on information and belief, Defendant does and has done substantial business in this judicial District, including: (i) committing acts of patent infringement and/or contributing to or inducing acts of patent infringement by others in this judicial District and elsewhere in Utah; (ii) regularly conducting business in this State and judicial District; (iii) directing advertising to or soliciting business from persons residing in this state and judicial District; and (iv) engaging in other persistent courses of conduct, and/or deriving substantial revenue from products and/or services provided to persons in this District and State.

5. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400(b).

FACTUAL BACKGROUND

6. Plaintiff CAO designs, develops, manufactures, and markets various products for use in, *inter alia*, the dental industry.

7. CAO has sought protection for its technological innovations resulting in numerous issued patents, including the '116 Patent at issue in this action.

8. The '116 Patent issued on February 3, 2009, with a filing date of September 22, 2004.

9. CAO is the owner by assignment of the '116 Patent which is directed towards a "laser system useful in medicine or dentistry."

10. On information and belief, Defendant AMD develops and markets a number of dental laser devices, including Picasso dental lasers ("Accused Devices").

11. On information and belief, Defendant AMD operates and maintains a website at www.amdlasers.com, where AMD's products and services, including the Accused Devices, are marketed to consumers worldwide.

COUNT ONE

(Patent Infringement of U.S. Patent No. 7,485,116)

12. Plaintiff reallages and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

13. Upon information and belief, Defendant AMD has (1) infringed and continues to infringe at least claim one of the '116 Patent by making, using, offering to sell, selling and/or importing, in this District and elsewhere in the United States, the Accused Devices and/or (2)

contributed to the infringement of the '116 Patent, and/or actively induced others to infringe the '116 Patent, in this district and elsewhere in the United States.

14. Defendant AMD's actions constitute infringement, active inducement of infringement, and/or contributory infringement of the '116 Patent in violation of 35 U.S.C. § 271.

15. CAO has sustained damages and will continue to sustain damages as a result of Defendant's aforesaid acts of infringement.

16. CAO is entitled to recover damages sustained as a result of Defendant's wrongful acts in an amount to be proven at trial.

17. Defendant's infringement of CAO's rights under the '116 Patent will continue to damage CAO's business, causing irreparable harm, for which there is no adequate remedy at law, unless it is enjoined by this Court.

18. Upon information and belief, Defendant has willfully infringed the '116 Patent, entitling CAO to increased damages under 35 U.S.C. § 284 and to attorney fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff CAO asks this Court to enter judgment in its favor and against Defendant and grant the following relief:

A. An adjudication that Defendant has willfully infringed and continues to infringe the '116 Patent as alleged above;

B. Orders of this Court temporarily, preliminarily, and permanently enjoining Defendant, its agents, servants, and any and all parties acting in concert with any of them, from

directly or indirectly infringing in any manner any of the claims of the '116 Patent pursuant to at least 35 U.S.C. § 283;

C. An award of damages adequate to compensate CAO for Defendant's infringement of the '116 Patent in an amount to be proven at trial;

D. An assessment and award of pre- and post-judgment interest on all damages awarded;

E. A finding that this is an exceptional case and an award of Plaintiff's costs and attorney fees;

F. A trebling of the damage award to Plaintiff; and

G. Any further relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury as to all claims and all issues properly triable thereby.

Respectfully submitted,

DATED: April 24, 2012.

By: */s/ C.J. Veverka*
C.J. Veverka
Rachel Jacques

Attorneys for Plaintiff,
CAO GROUP, INC.