

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ALLEN DEAN MAMMEL	§	
Plaintiff	§	
	§	
vs.	§	Civil Action No. 10-2028
	§	
RICHARD (BO) HOAG and	§	
GATEWAY HOOK CO. LLC	§	
Defendants	§	

PLAINTIFF'S COMPLAINT FOR PATENT INFRINGEMENT

Comes now, Plaintiff, Allen Dean Mammel, complaining of Richard (Bo)Hoag and Gateway Hook Co., LLC (Defendants) and would show onto the Court the following:

1. Plaintiff is an individual residing in the Northern District of Texas, Dallas Division.
2. Defendant Richard (Bo) Hoag (hereinafter referred to as "Defendant Hoag") is an individual residing in the Northern District of Texas, Dallas Division.
3. Defendant Gateway Hook Co., LLC (hereinafter referred to as "Defendant Gateway") is a Texas limited liability company with its principal place of business in the Northern District of Texas, Dallas Division.
4. Both Defendants can be served with process at 15506 Wright Brothers Drive, Suite 300, Addison, Texas, 75001. Defendant Hoag is authorized to accept service for Defendant Gateway.
5. This action arises under the United States Constitution, Art. 1 Sec. 8, 35 USCA 281 and subject matter jurisdiction is proper in this court under 28 USCA 1331.
6. On October 26, 1999, United States Letters Patent No. 5970650 were issued to the plaintiff for an invention in fishing called "No Thread Fishing Equipment". The Plaintiff

owned the patent throughout the period of the Defendant's infringing acts and still owns the patent.

7. The Defendant has infringed and is still infringing the Letters Patent by making, selling, and using the No Thread Fishing Equipment that embody the patent invention, and the Defendant will continue to do so unless enjoined by this court.


8. The Plaintiff has complied with the statutory requirements of placing a notice of the Letters Patent on all No Thread Fishing Equipment it manufactures and sells and has given the Defendant written notice of the infringement. Defendant has acknowledged actual notice of the infringement since at least April 20, 2010.

Therefore, the Plaintiff demands:

- (a) a preliminary and final injunction against the continuing infringement;
- (b) an accounting for damages; and
- (c) interest and costs.
- (d) attorney's fees

Respectfully submitted,

GARY E. SMITH, P.C.
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Attorneys and Counselors

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