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13 Attorneys for Plaintiffs  
14 **CATHETER CONNECTIONS, INC.**  
15 **CLINICAL TECHNOLOGY, INC.**

16 **UNITED STATES DISTRICT COURT**  
17 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

18 \_\_\_\_\_ )  
19 CATHETER CONNECTIONS, INC., )  
20 a Delaware corporation, )

21 CLINICAL TECHNOLOGY, INC., an )  
22 Ohio corporation )

23 Plaintiffs,

24 v.

25 IVERA MEDICAL CORPORATION, )  
26 a California corporation, )

27 Defendant.  
28 \_\_\_\_\_ )

Case No: '14CV2208 BAS RBB

**COMPLAINT FOR  
DECLARATORY JUDGMENT**

**JURY TRIAL DEMANDED**

1 Plaintiffs Catheter Connections, Inc. (“Catheter Connections”) and  
2 Clinical Technology, Inc. (“CTI”) by their undersigned attorneys, as and for  
3 their complaint against defendant Ivera Medical Corporation (“Ivera”), says:

4 **PARTIES AND JURISDICTION**

5 1. Plaintiff Catheter Connections is a Delaware corporation with its  
6 principal place of business at 2455 E. Parleys Way, Suite 150, Salt Lake City,  
7 Utah 84109.

8 2. Plaintiff CTI is an Ohio corporation with its principal place of  
9 business at 7005 South Edgerton Road, Brecksville, Ohio 44141.

10 3. Catheter Connections, co-founded by nurses, is a medical device  
11 manufacturer that develops and commercializes innovative vascular access  
12 products designed to protect patients from acquiring infections during  
13 intravenous infusion therapy. Its DualCap System™ is a family of user-friendly  
14 products that provides healthcare facilities with a cost-effective, integrated  
15 solution for IV disinfection and protection, helping in the fight against IV  
16 catheter-related blood stream infections. Designed by nurses for nurses,  
17 DualCap® safely disinfects both IV tubing end connectors and IV catheter luer  
18 access valves. Additional information about the DualCap System™ and  
19 Catheter Connections is available at [www.catheterconnections.com](http://www.catheterconnections.com).

20 4. Plaintiff CTI is a distributor of the DualCap System™.

21 5. Defendant Ivera is a California corporation that has alleged its  
22 principal place of business is at 3525 Del Mar Heights Road, Suite 430, San  
23 Diego, California 92130.

24 6. Defendant Ivera sells a disinfectant cap, known as the CuroS®  
25 Disinfecting Port Protector, in competition with Catheter Connections’  
26 DualCap® disinfectant cap products for luer access valves (“LAV caps”).  
27  
28



1 11. Ivera then proceeded on a campaign to intimidate Catheter  
2 Connections' distributors by suing them years after it had sued Catheter  
3 Connections for alleged infringement of the same patents.<sup>2</sup>

4 12. Ivera has an established pattern and practice of suing its  
5 competitors on the same day any patent issues in which it has any interest.  
6 Since Ivera's inception, it has filed 20 lawsuits against its competitors, the vast  
7 majority of which allege patent infringement. Upon information and belief,  
8 Ivera has, upon the issuance of every new patent addressed to LAV caps to  
9 which it has rights, initiated patent infringement actions against the other  
10 manufacturers of LAV caps at the earliest possible moment it can legally do so.

11 13. Ivera's CEO affirmed Ivera's intent to assert the '650 patent  
12 against Catheter Connections in a press release of May 1, 2014, announcing a  
13 summary judgment decision invalidating all the patents Ivera had asserted  
14 against Catheter Connections in three of the California actions:

15 "We are disappointed in the Court's decision and are  
16 evaluating our options . . ." said Bob Rogers, CEO of  
17 Ivera Medical. "***Our strategy regarding intellectual  
18 property has always been to build a robust portfolio,  
19 so that an adverse ruling in one case does not impact  
20 the broader strategy. . . .***"

21 (See Exhibit A) (emphasis added.)

22 Contract over which it was suing.

23 <sup>2</sup> See *Ivera Medical Corp. v. New England Medical Specialties, Inc.*, Case No.  
24 3:13-cv-02063, (S.D. of Cal., filed May 13, 2013 in Connecticut and transferred  
25 to San Diego on August 20, 2013); *Ivera Medical Corp. v. The Bimeco  
26 Group, Inc.*, Case No. 3:13-cv-1763, (S.D. of Cal., filed May 23, 2013 in  
27 Georgia and transferred to San Diego on July 29, 2013); *Ivera Medical Corp. v.  
28 New Alliance of Independent Medical Distributors, Inc. d/b/a Alliance Medical  
and Amtec Medical, Inc.*, Case No. 13CV2607 BTM WMC (S.D. of Cal, filed  
October 29, 2013, initially filed May 10, 2013 in W.D. of Tex and dismissed  
October 30, 2013).

1 Defendant Ivera's initiation of the California actions against Catheter  
2 Connections and several of its distributors for infringement of patents that  
3 allegedly cover Catheter Connections LAV caps, coupled with the  
4 pronouncement of Ivera's CEO that Ivera's strategy of building a patent "so that  
5 an adverse ruling in one case does not impact the broader strategy"  
6 demonstrates that a substantial dispute exists between the parties over Catheter  
7 Connections' and CTI's right to sell DualCap LAV cap products free of any  
8 infringement claims under the '650 patent.

9 14. An definite and concrete, real and substantial, justiciable case or  
10 controversy therefore exists between Catheter Connections, CTI and Ivera  
11 concerning, *inter alia*, the invalidity and non-infringement of the '650 patent  
12 which is of sufficient immediacy and reality to warrant the issuance of a  
13 declaratory judgment.

14 **FIRST COUNT**  
15 **DECLARATORY JUDGMENT OF INVALIDITY OF THE '650 PATENT**

16 15. Plaintiffs repeat the allegations of paragraphs 1 through 14 as if  
17 fully set forth here.

18 16. The '650 patent is invalid under one or more provisions of the  
19 patent law of the United States, including, without limitation, 35 U.S.C. §§ 101,  
20 102, 103, and 112.

21 17. Accordingly, Catheter Connections and CTI seek a judgment  
22 declaring that the claims of the '650 patent are invalid, void and of no legal  
23 consequence.

24 **SECOND COUNT**  
25 **DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF THE**  
26 **'650 PATENT**

27 18. Plaintiffs repeat the allegations of paragraphs 1 through 17 as if  
28 fully set forth here.

1           19. Catheter Connections and CTI have not infringed and do not  
2 infringe, directly or indirectly, any valid claim of the '650 patent, and have not  
3 contributed to or induced and do not contribute to or induce infringement of the  
4 '650 patent.

5           20. Accordingly, Catheter Connections and CTI seek judgment  
6 declaring that they do not infringe and have not infringed, directly or indirectly,  
7 contributorily or by inducement, any valid claim of the '650 patent.

8           WHEREFORE, plaintiffs Catheter Connections, Inc. and Clinical  
9 Technology, Inc. requests judgment in its favor and against defendant Ivera  
10 Medical Corporation, as follows:

- 11                           a. Declaring that the '650 patent is invalid;
- 12                           b. Declaring that Catheter Connections and CTI have not  
13 infringed and do not infringe the '650 patent and have not contributed to or  
14 induced and do not contribute to or induce infringement of the '650 patent;
- 15                           c. Awarding to Catheter Connections and CTI attorneys'  
16 fees under 35 U.S.C. § 285 and costs of suit; and
- 17                           d. Awarding such other and further relief as the Court  
18 may deem just and appropriate.

19   **DEMAND FOR JURY**

20           Plaintiffs demand a jury trial for all issues so triable.

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Respectfully submitted,

Dated: September 16, 2014

THE ECLIPSE GROUP LLP

/s/ Edward F. O'Connor

Edward F. O'Connor

*Attorneys for Defendants*  
**CATHETER CONNECTIONS,  
INC. and  
CLINICAL TECHNOLOGY, INC.**

# **Exhibit A**



## Ivera Medical Announces Patent Decision from San Diego Court

May 1, 2014 / in Intellectual Property/Legal

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Ivera Medical Corporation, headquartered in San Diego, CA, announced that the United States District Court for the Southern District of California has rendered summary judgment against some Ivera patents, in motions filed by Excelsior Medical, Hospira, and Catheter Connections. The case involves U.S. Patent Nos. 7,780,794 (“the ‘794 patent”), 7,985,302 (“the ‘302 patent”), and 8,206,514 (“the ‘514 patent”).

“We are disappointed in the Court’s decision and are evaluating our options, including an appeal of this decision, and note that these patents continue through an inter partes review process within the US Patent and Trademark office” said Bob Rogers, CEO of Ivera Medical. “Our strategy regarding intellectual property has always been to build a robust portfolio, so that an adverse ruling in one case does not impact the broader strategy. Indeed, Ivera continues to be very pleased with our progress in a Florida court patent infringement case, and the impending issuance of what will be the seminal patent in this space, for which we have an exclusive license. Further it is important to note that Ivera has freedom to operate with our Curoso® Port Protectors.”

Curoso products employ passive disinfection to disinfect intravenous devices eliminating the technique variation found in manual procedures. With two disinfecting port protector options—Curoso Strips and individual Curoso—nurses can conveniently comply with valve disinfection protocols by simply peeling the foil seal from the distinctive green cap and twisting Curoso onto the top of any luer-activated IV access port or needleless valve. Inside Curoso, a 70% isopropyl alcohol (IPA) saturated sponge-like foam bathes the surface of the venous access device to provide consistent and reliable disinfection of the port surface in three minutes. Once in place, Curoso maintains a clean port for up to seven days, if not removed. Extending passive disinfection and protection to male-luer connectors, Curoso Tips improve disinfection compliance with IV tubing connectors and needleless syringes by immersing the exterior of the male luer in alcohol. Curoso Tips come in a convenient strip dispenser that places five disinfecting Tips in easy reach of clinicians at the point of care. The cap’s highly visible bright green color allows auditors to monitor caregiver disinfection practice compliance at a glance.

### About Ivera Medical

Ivera Medical Corporation, a certified Minority Business Enterprise (MBE), is focused on the design, development, manufacture, marketing and sale of products that help healthcare providers reduce facility-acquired patient infections. Curoso, manufactured in Carlsbad, CA, is the first disinfecting cap to be marketed in the U.S. and has received FDA’s 510(k) market clearance. For more information about Curoso and Ivera Medical, visit the website at [www.curoso.com](http://www.curoso.com)

Contact Us

### GPO Contracts

[Novation Premier](#)  
[Premier ASCEND](#)  
[MedAssets/Broadlane Health Trust](#)  
[FSS](#)  
[DAPA](#)

### The Latest

Venture backed Catheter Connections continues to make false statements, according to Ivera Medical

Second Independent Lab study demonstrates Catheter Connections’ DualCap Product Fails to Disinfect, Announces Ivera Medical

Catheter Connections’ DualCap Product Fails to Disinfect in Independent Study

[More...](#)

### Events

**IDN Summit – Fall**  
 September 22, 2014 -  
 September 24, 2014

**ANCC Magnet Meeting**  
 October 8, 2014 -  
 October 14, 2014

**SHEA/ID Week**  
 October 8, 2014 -  
 October 12, 2014

[See All Events](#)

### FAQs

Review the frequently asked questions related to Curoso design, use and purchasing.

### Ivera Medical Corporation

10805 Rancho Bernardo Road, Suite  
 100  
 San Diego, CA 92127  
[info@curoso.com](mailto:info@curoso.com)

tel: (888) 497-3884  
 fax: (858) 228-1770

Join Us On:



# CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Catheter Connections, Inc., a Delaware corporation, and Clinical Technology, Inc., an Ohio corporation

(b) County of Residence of First Listed Plaintiff Salt Lake City  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
THE ECLIPSE GROUP LLP, 550 West C Street, Suite 2040,  
San Diego, California 92101. 619.239.4340

**DEFENDANTS**

Ivera Medical Corporation, a California Corporation

County of Residence of First Listed Defendant San Diego  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) '14CV2208 BAS RBB

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other  <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act  <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		FEDERAL TAX SUITS	
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN** (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 U.S.C. § 2201, et seq.  
Brief description of cause:  
Declaratory Judgment of Patent Invalidity and Non-Infringement

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ \_\_\_\_\_ CHECK YES only if demanded in complaint: JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S) IF ANY**

(See instructions): JUDGE Marilyn L. Huff DOCKET NUMBER 12-cv-954; 12-cv-1587

DATE 09/16/2014 SIGNATURE OF ATTORNEY OF RECORD  
/s Edward F. O'Connor

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.